

THE WIGGONHOLT ASSOCIATION

Response to Single Issue Soft Sand Review – Issues & Options Consultation (Reg. 18)

The MPA has taken the Local Aggregates Assessment as the basis of this consultation, and has made certain deductions about the need for land-won soft sand. Based on the logic of this approach, the MPA is meeting the Inspector's requirement to identify new on-shore sites and to make its selection the subject of a supplementary planning document. The Inspector's rationale for considering soft sand sites within the West Sussex area of the South Downs National Park is the apparent lack of resources outside it. The MPA has considered many factors other than extraction in West Sussex and has brought forward two sites just outside the boundary of the South Downs National Park as well as seven sites within it. All of them have severe environmental constraints.

QUESTION 2: We are not clear that all 'reasonable alternatives' have been considered. In the case of marine-dredged soft sand, there is some uncertainty about whether this is or is not acceptable to the industry, or could be made viable. There are known deposits in the eastern Channel which have not yet been licensed. Without licensing information from the Crown Estates it is impossible to know when this material will come on stream. Meanwhile land-won sand will increase, and the South Downs National Park is now in the frame. Wharf capacity is also in question. The capacity of one formerly safeguarded wharf (Kingston Wharf) at Shoreham has been transferred from the Western to the Eastern Harbour Arm Wharf since the Examination-in-public of the Plan. Another safeguarded Western Arm site (New Wharf) is unlikely to have its planning permission renewed. This will shortly result in a loss of capacity. Paras 2.2.6 to 9 of the Local Aggregate Assessment 2018 appear to accept this, despite a variety of evidence about the marketability of suitable marine-dredged sand as a substitute for land-won material. It is however noted that the forecast of (land-won) landbank required during the Plan period is increasing because of a notional increase in housing numbers (see Issue 1 [The Need for Soft Sand](#)). There is thus a projected increase of about half a million tonnes over and above the figure quoted in Policy M2 of the Minerals Local Plan adopted in 2018. If this is accepted, all alternative sources of aggregate should be brought forward in earnest.

QUESTION 4: Most of the sites considered contain low quality agricultural land, which is nevertheless a statutory index. Unusual among these sites, the Chantry extension's area of 2.5 hectares contains Grade 2 BMV. On this basis, the more westerly sites ought to be more viable

for extraction than the Chantry site. However soil quality is now overtaken in importance by more recent environmental categories, reflecting a modern approach to agriculture. It is of concern that creation of habitat is the long-term restoration objective for the BMV land of the Chantry, discounting its agricultural value. The MPA needs to decide whether there is any merit in BMV land at all, or whether it is simply going through the motions in considering it.

QUESTION 5: Chantry Lane Extension This site has been on the list of potential sites for a long time, inhibited in recent years by being inside the National Park Boundary. It seems to The Wiggonholt Association a most striking example of an unsustainable choice. The negative aspects are listed by the MPA but we would like to give some of them much greater emphasis.

- The site is very close to the built-up area boundary of Storrington, which this industrial development would in reality extend presumably removing it from the Park.
- Ironically, extracted mineral cannot be removed from the access near the BUAB at Chantry Lane because of Highways objections. Yet this route might have restricted the environmental damage of the proposed alternative.
- Instead, the more succinct version of the two site plans reports that a new access is proposed on to Sullington Lane to the east. This would cut a swathe across land of very high landscape value, running below the ridge occupied by Sullington Manor Farm and its cluster of listed buildings. This part of Sullington is also a conservation area, so the issues of setting and views in and out of the area both come into play. This route would clearly be unacceptable in landscape terms. The site itself might have a 'minor' impact in historic environmental terms, but the operation itself has a major one.
- The site is an extension of a disused quarry. Because of its situation in the Lower Greensand this was mined in days when excavation was simpler and less obtrusive. The fact that this is an extension should in this case be considered academic
- The whole area is part of this Greensand vein. Across the A283 are Sandgate Park, an historic and vast extraction site, abutting onto the Hampers Lane Sandpit and the former Angels Sandpit. The cumulative effect of these sites is of staggering proportion, and the spread of extraction across the road to the Chantry would be unacceptable for this reason alone. The yield is one million tonnes from a small site of 2.5 hectares, suggests a deep deposit which requires special restoration, and not a restoration to agriculture. Although the site is deliverable immediately, being owned by the operator, the period of operation is not disclosed although it could be 10 years. Then there is the period of restoration which is often open-ended.

- Once having got extraction underway, the question arises where it is to go and how it is to be transported. The site is close to competing markets. The A283 is a busy road leading to the strategic network formed by the A24. However there are problems. If traffic turns west, it meets the Storrington BUAB which contains the worst Air Quality Zone in the whole country. If the traffic turns east, it would, as the commentary suggests, require significant highway improvement works. The junction of Sullington/Water Lane and the A283 is already a difficult one and traffic lights would be needed. Sand lorries frequently emerge from the pits in Water Lane (Sandgate) and Hampers Lane – these are big pits and they sell from site. The volume of traffic is heavy compounded by the high volume of HGVs diverting from the Arundel bypass via the B2139 through Storrington. In the segment between the above junction and the Washington Roundabout the road has recently accommodated new residential development. This segment regularly has heavy build-ups of idling traffic at peak hours and also throughout the day. Many drivers divert via Thakeham and West Chiltington to pick up the traffic again beyond Storrington. Road conditions are critical without the added impact of further sand extraction.
- We agree that highway improvements would have a further unacceptable landscape impact, but this does not take into account those long-established residences, including the original Sandgate Park dwellings, which are found all along the north side of the A283. Residents have seen this stretch of road deteriorate badly over the years, and the impact on their amenity should be inhibited rather than increased.
- Please see comments under question 4 above on BVM land. This operation will not have a “minor negative effect” on high quality farmland, as suggested, but will convert it long term into a nature habitat, which national policy does not suggest should take precedence.

Our re-evaluation of the Chantry site would therefore be as follows:

LANDSCAPE AND VISUAL DESIGNATIONS: High risk of harm related to access

NATURE CONSERVATION ETC. Medium risk of harm

HISTORIC ENVIRONMENT DESIGNATIONS: Highly negative effect on listed buildings and conservation area of Sullington

WATER ENVIRONMENT: No comment

AIR QUALITY: High risk of adverse impact not only on AQMA but on residential property along the A283 east

SOIL QUALITY: Grade 2 is high-quality BMV land which will be restored with a view to habitat. HIGH risk of loss of BMV

PUBLIC RIGHTS OF WAY: No comment

TRANSPORT AND ACCESS: High risk of harm to historic environment and residential amenity

SERVICES AND UTILITIES: No comment

AMENITY: High risk. The potential impact has been underestimated.

CUMULATIVE IMPACT: Intensely high: we recommend a structured series of site-visits in the area, which the Sandgate Park and Rock Common operations have blighted for the past century.

AIRPORT SAFEGUARDING: No comment

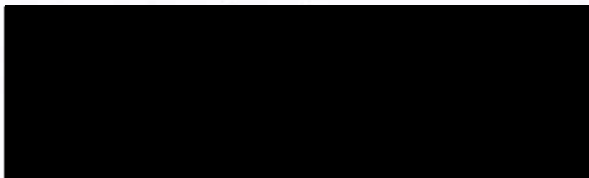
QUESTION 6: We are pleased to see that the Wiggonholt site (M/HO/1B) remains excluded because of unacceptable impact on its landscape character and the deliverability of the site.



Working in Partnership



21 January 2019



Dear Sir/Madam

Soft Sand Review of the West Sussex Joint Minerals Local Plan: Issues and Options Consultation (Regulation 18)

In partnership, West Sussex County Council and the South Downs National Park Authority prepared the Joint Minerals Local Plan, which was formally adopted in July 2018.

Policy M2 of the adopted Plan requires the Authorities to undertake a 'Single Issue Soft Sand Review' of the Joint Minerals Local Plan. The Review must address the strategy to maintain a steady and adequate supply of soft sand.

The Authorities have prepared an Issues and Options consultation document, seeking views from all stakeholders on three key issues:

196. the amount of soft sand that needs to be planned for;
197. strategy options for soft sand supply; and
198. potential sites and site selection.

The consultation document includes a number of questions about each issue that we would like you to answer.

Please note that the identification of sites with potential for mineral extraction does not imply that the Authorities consider that the sites are suitable for development either now or in the future. Furthermore, the consultation document cannot be taken as representing either an intention to allocate these sites or as a material consideration in the determination of a planning application.

A number of evidence base documents have been published in support of the consultation document. There include the Local Aggregates Assessment and the Soft Sand Site Selection Report.

Comments must be submitted no later than 5pm on 18 March 2019 using one of the following:

- our online response form – available via our website (www.westsussex.gov.uk/mwdf) – our preferred method;
- a hard copy response form, which can be found at deposit points and libraries county wide, or downloaded from our website, posted to Planning Services (Ref. SSR), West Sussex County Council, County Hall, Chichester, PO19 1RH;

- emailing your comments to mwdf@westsussex.gov.uk – please provide the information requested on Part A of the response form and make it clear which question/s you are answering.

All relevant documents are available on our website, and being made available at West Sussex libraries and County, District or Borough Council offices, including the South Downs National Park office in Midhurst.

What Happens Next?

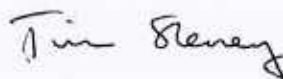
We will use your comments to help inform the preparation of a Proposed Submission Draft Soft Sand Review. During summer 2019, we will then invite representations on legal and procedural compliance and the 'soundness' of the Review, before submitting it for independent examination by a Government-appointed Planning Inspector.

Please contact Planning Services on 01243 642118 or email the team via mwdf@westsussex.gov.uk if you have any queries.

Yours faithfully



Mike Elkington
Head of Planning Services
West Sussex County Council



Tim Slaney
Director of Planning
South Downs National Park Authority



SUSSEX ORNITHOLOGICAL SOCIETY

Registered charity 256936

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West Sussex BN16 4HJ

22 February 2019

By e-mail only

mwdf@westsussex.gov.uk

Dear Sirs,

Soft Sand Review of West Sussex Joint Minerals Local Plan: Issues and Options
Consultation (Regulation 18)

Thank you for inviting us to comment on this document. We have some points to make and would like it to be noted that we may wish to speak to these comments at a public hearing into these proposals.

The points we would make are as follows:

We have no comments on Issue 1 (Need for Soft Sand)

On Issue 2 (the Strategy for Soft Sand Supply), Option D – Supply from alternative sources including marine dredged material

We are surprised about the lack of apparent knowledge of why marine dredged sand is being mixed with land-won sand to meet current needs and what the future expectations on this are. This seems a fairly fundamental assumption that needs to be clarified if there is to be confidence in the demand assumptions.

On Issue 3 (Potential Sites and Site Selection)

Firstly SOS is not opposed to the creation of sand pits, as those that are not filled in at the end of their working life can become excellent sites for birds. For example most of the Sussex population of Sand Martins breed in holes that they excavate on the faces of sand pits. For sand pits to be attractive for Sand Martins it is important that their cliff faces are free from ledges and that they are as vertical as possible, as Pits with stepped ledges enable species such as Carrion Crow to access the entrances to nest holes and take young birds before they fledge. We would ask that this be borne in mind.

We have no comments on Question 4 (Site selection methodology), but would comment on Question 5 (the nine potential sites) as follows:

We are concerned about one of these sites - Duncton Common - being listed as a potential site, as it is next door to the SSSI at Lavington Common. This SSSI in turn abuts the National Trust Reserve at Lavington Plantation, and the two sites form an important linked heathland. Considerable work has been done on the National Trust Reserve in recent years (partly funded by SOS) to enhance its attractiveness as a heathland site, and as a result it is hosting an increasing number of heathland bird species, including Woodcock, Nightjar, Woodlark, Dartford Warbler, Stonechat, Tree Pipit and Common Crossbill, as well as Firecrest. We are therefore concerned that the development of Duncton Common as a sand extraction site could impact the adjoining SSSI and thereby impact the heathland that is spread across this SSSI and the National Trust Reserve. And that would impact important species of birds.

For that reason we are opposed to this site being considered for sand extraction.

We also note that there is a small (0.34ha) botanically important Local Wildlife Site (Duncton Common) in the middle of this potential soft sand site, which would presumably be destroyed were it to be developed.

However, if this site does need to be developed then we believe that the best way to achieve this would be for it to be only partially developed, so that a meaningful buffer strip remained between a smaller Duncton Common sand pit and the SSSI heathland to the west of it. Were a smaller sand pit to be developed than the one proposed then we would suggest that when the workings cease a restoration plan be put in place that would significantly improve the Duncton Common site for birds (probably by creating a mix of wetland and heathland habitat).

However, we would need to see detailed proposals on such a scaled back development before being able to comment on whether they were acceptable, and would prefer for Duncton Common not to be considered for sand extraction development at all.

Aside from these concerns about the Duncton Common site we have no objections to the other 8 potential sites that are being considered.

Yours sincerely,

[Redacted signature]

[Redacted name and contact information]

Planning Services (Ref. SSR)
West Sussex County Council
County Hall
Chichester
West Sussex
PO19 1RH

Lucy Bartley
Consultant Town Planner

[Redacted]
[Redacted]
[Redacted]
[Redacted]

07 February 2019

Dear Sir / Madam

**West Sussex County Council: Joint Minerals Local Plan: Issues and Options Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Lucy Bartley
Consultant Town Planner

Spencer Jefferies
Development Liaison Officer, National Grid

[Redacted]
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Yours faithfully

[via email]

Lucy Bartley
Consultant Town Planner

cc. Spencer Jefferies, National Grid

South Downs Society comment on the:

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

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1. PART A Information

PART A: PERSONAL INFORMATION

A2. Client Details (if applicable)

If you are completing this form on behalf of someone else then please provide details of the person(s) or organisation you represent.

Name [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

A3. Contact Address Details

Please provide details of the person who should be contacted regarding this response

Preferred Method of Contact

Post:

Email YES

Please tick all categories below that most adequately describe you.

Resident

Parish/Town Council

SDNPA Member

Local Business

District/Borough
Councillor

Government Organisation

- Minerals or Waste
Industry
- Landowner

- County Councillor
- Local Authority

- Non-Government
Organisation: **South
Downs Society**
- Other (please specify):

2. Introduction

South Downs Society

These are the comments of the South Downs Society (SDS), also known as the Friends of the South Downs. The Society has over 1500 members and its focus is the conservation and enhancement of the special qualities of the National Park and their quiet enjoyment.

This is the South Downs Society's submission in relation to the Soft Sand Review being conducted by West Sussex County Council and the South Downs National Park which closes on the 18th March 2019

Document Links

We have reviewed a number of documents in relation to this consultation. The following are the main links provided by West Sussex County Council:

Joint Minerals Local Plan - The strategy for minerals supply in West Sussex until 2033.

<https://www.westsussex.gov.uk/about-the-council/policies-and-reports/environment-planning-and-waste-policy-and-reports/minerals-and-waste-policy/joint-minerals-local-plan/>

Soft Sand Review (SSR) - consultation

<https://www.westsussex.gov.uk/about-the-council/policies-and-reports/environment-planning-and-waste-policy-and-reports/minerals-and-waste-policy/soft-sand-review-consultation/>

The SDNP Local Plan Status

The South Downs Local Plan is currently undergoing a further stage of public examination to review a small number of selected policy items as requested by the planning inspector following the main public examination. As an emerging development plan, it is therefore at an advanced stage of preparation and carries considerable weight in decision making. In this submission therefore we will make reference to the relevant national park planning policies where they apply in relation to any developments which may result from the proposals contained within the Soft Sand Review. See Appendix A covering:

- Core Policy SD1: Sustainable Development
- Core Policy SD2: Ecosystem Services
- Strategic Policy SD4: Landscape Character
- Strategic Policy SD9: Biodiversity and Geodiversity
- Development Management Policy SD11: Trees, Woodland and Hedgerows
- Strategic Policy SD17: Protection of the Water Environment
- Strategic Policy SD19: Transport and Accessibility
- Strategic Policy SD45: Green Infrastructure

Explanatory Note

We understand that the Joint Minerals Local Plan (JMLP) is part of a periodic process of review of minerals resources in counties across England as required by the UK Government. The Soft Sand review in West Sussex is a derivative of the already submitted waste and minerals plan.

Policy M2 of the JMLP requires the Authorities to undertake a review to address a 'shortfall' in soft sand to the end of the JMLP plan period (2033). The JMLP Single Issue Review must consider the strategy for how the shortfall will be met and, as required, the potential need for allocating sites for soft sand extraction.

3. Key Issues

The SSR consultation document sets out three main issues for consideration which are:

1. The need for soft sand;
2. The strategy for soft sand supply; and
3. Potential sites and site selection.

4. Comments of the of the South Downs Society (SDS)

The SDS will address all 3 of the key issues in this document. In making these comments we have particular regard to the following:

The Environment Act (1995), Section 62 (2) clarified the responsibilities and duties of any public organisation working in the National Park to have regard to National Park purposes. These are:

- *to conserve and enhance the natural beauty, wildlife and cultural heritage of the area*
- *to promote opportunities for the understanding and enjoyment of the special qualities of the National Park.*

There is also a duty for the National Park to foster the social and economic wellbeing of local communities.

Also, we draw your attention to the opening remarks by Margaret Paren, the chair of the South Downs National Park authority, in the introduction to the **SDNPA Local Plan** which, as you may know, is nearing its closing stages of examination and now **carries great weight in planning considerations.**

*"This is the first Local Plan ever produced for the National Park: a landmark for this very special place. It looks rather different from most other local plans because **it must recognise the national importance of the landscapes and our duty to conserve and enhance them.** But this Plan is not just about these precious, nationally important, landscapes, their wildlife and cultural heritage. It is about the wide range **of benefits they provide for us all that must be nurtured and protected for future generations.** It is about our communities that live and work in the National Park and their social and economic needs".*

Economic Need

You may note the reference to 'economic needs' in both the legislative requirements placed upon a National Park and in the opening remarks by the chair of the National Park. Please do not grasp upon this as a rationale for expanding willy-nilly quarries for minerals. The reference to economic needs is relevant, in this case, to **those who live and work in the Park** not to meet some national target. In any event you will note from our submission that we question the basis on which the WSCC have identified the need.

5. Government Commitment to the Environment

We refer you 'A Green Future: Our 25 Year Plan to Improve the Environment' launched by the Prime Minister in January 2018.

We draw you attention to:

Chapter 2: Recovering nature and enhancing the beauty of landscapes

And to 'Develop a Nature Recovery Network':

To protect and restore wildlife, and provide opportunities to re-introduce species that we have lost from our countryside. Conserve and enhance the natural beauty of our landscapes by reviewing National Parks and Areas of Outstanding

Natural Beauty (AONBs) for the 21st century, including assessing whether more may be needed.

Also to the **Economic Benefit of National Parks** on Page 56:

226 million visits were made to the public forest estate in 2016, while the estimated 95 million people who visit National Parks and surrounding areas each year spend more than £4bn and support 68,000 jobs. Our goal is to make sure that our policies balance the needs of a growing, vibrant society with the ability to access green space.

From the confirmation of the first National Park in the Peak District in 1951, to England's youngest National Park, the

Finally to the **South Downs** on page 56

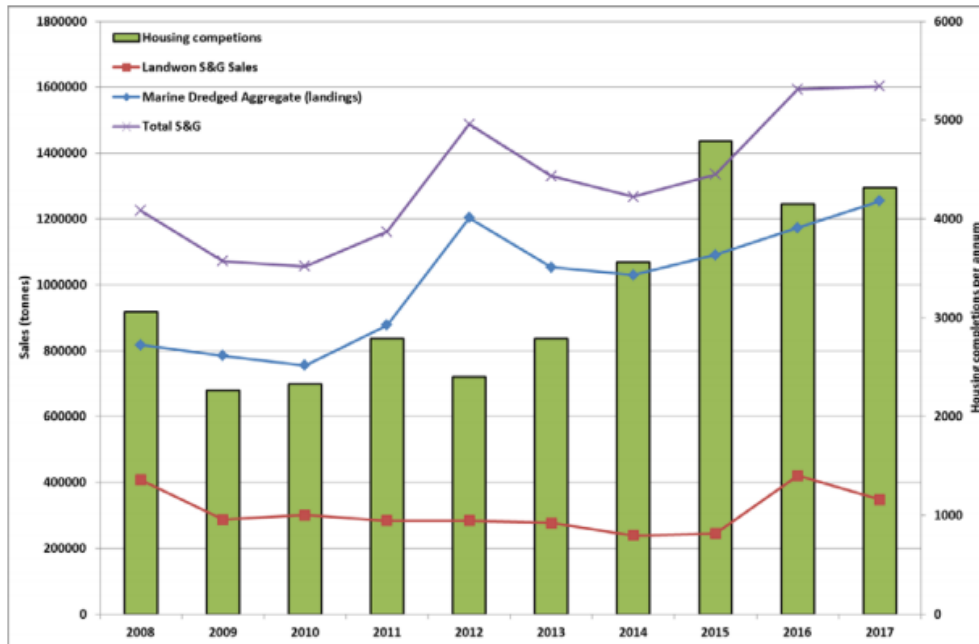
South Downs, in 2010, the creation of designated landscapes – which also include Areas of Outstanding Natural Beauty (AONBs) – has been among the outstanding environmental achievements of the past 100 years. They provide a patchwork of stunning, and protected, landscapes. In England, a quarter of our landscape is designated in this way, around 10% as National Parks and 15% as AONBs. We will make sure they continue to be conserved and enhanced, while recognising that they are living landscapes that support rural communities.

6. Need for Soft Sand

Item 1 of the SSR sets out the 'need'

The Single Issue Soft Sand Review – Issues & Options Consultation (Reg.18) document relies solely upon the Local Aggregates Assessments (LAA) to predict 'needs' from 2019 to 2033 (14 years). The LAA relied up historical sales of the material to assess annual demand alongside the usage and to extrapolate future demand. Here is the WSCC 2017 chart:

Figure 1: Sales of Sand and Gravel in West Sussex, compared to housing completions 2008 – 2017



As you will see the land won sales are a small fraction of the marine dredged sales. You may also see that the housing completions do not necessarily follow the supply of land won sales.

We note that it is a requirement of the UK government that responsible local authorities undertake an annual LAA review. In the case of West Sussex we have found documentation on their website giving details of reviews over the period 2013 to 2018:

- [Local Aggregate Assessment - January 2019 \(PDF, 1.6MB\)](#)
- [Local Aggregate Assessment - April 2018 \(PDF, 1.6MB\)](#)
- [Local Aggregate Assessment - January 2017 \(PDF, 1.3MB\)](#)
- [Local Aggregate Assessment - April 2016 \(PDF, 1.5MB\)](#)
- [Local Aggregate Assessment - March 2015 \(PDF, 1.1MB\)](#)
- [Local Aggregate Assessment - February 2014 \(PDF, 706KB\)](#)

In order to understand the wider context of the demand for mineral resources we have reviewed Hampshire Surrey and East Sussex LAAs.

7. SDS Findings – ‘Need’

a) Conflicts of interest?

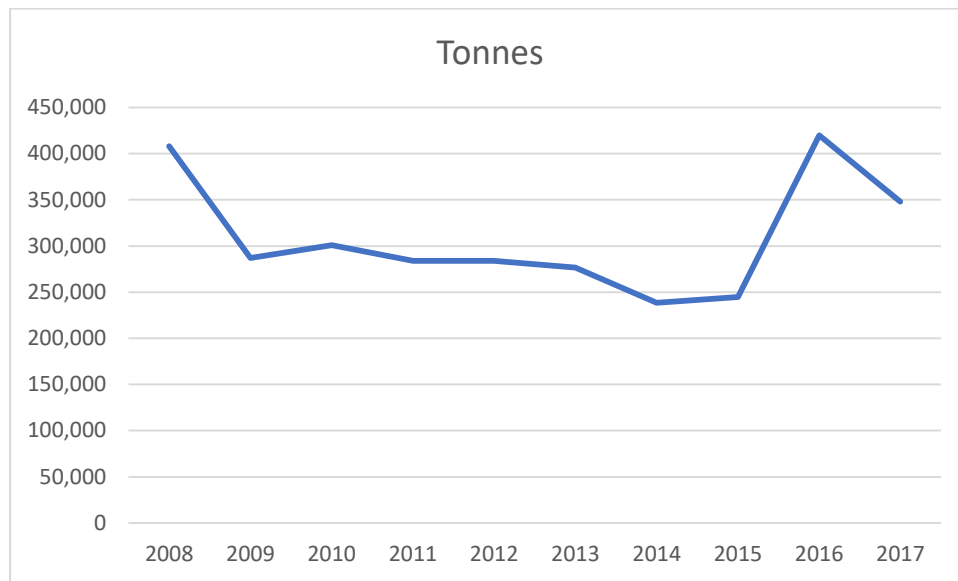
We understand that the Mineral Products Association not only writes the guidance on preparation of Local Area Assessments but they also sit in the Aggregates working parties. If this is the case their influence should be counterbalanced by the inclusion of environmental bodies.

b) Sales of Minerals

As you will see from the West Sussex LAA surveys between 2013 and 2018 there is a less than level demand for this type of mineral. If this trend continues, and there seems to be no evidence it won't, the need for this aggregate will reduce to an extent

where the predicted 2033 shortfall estimated is more than compensated for by the lack of demand.

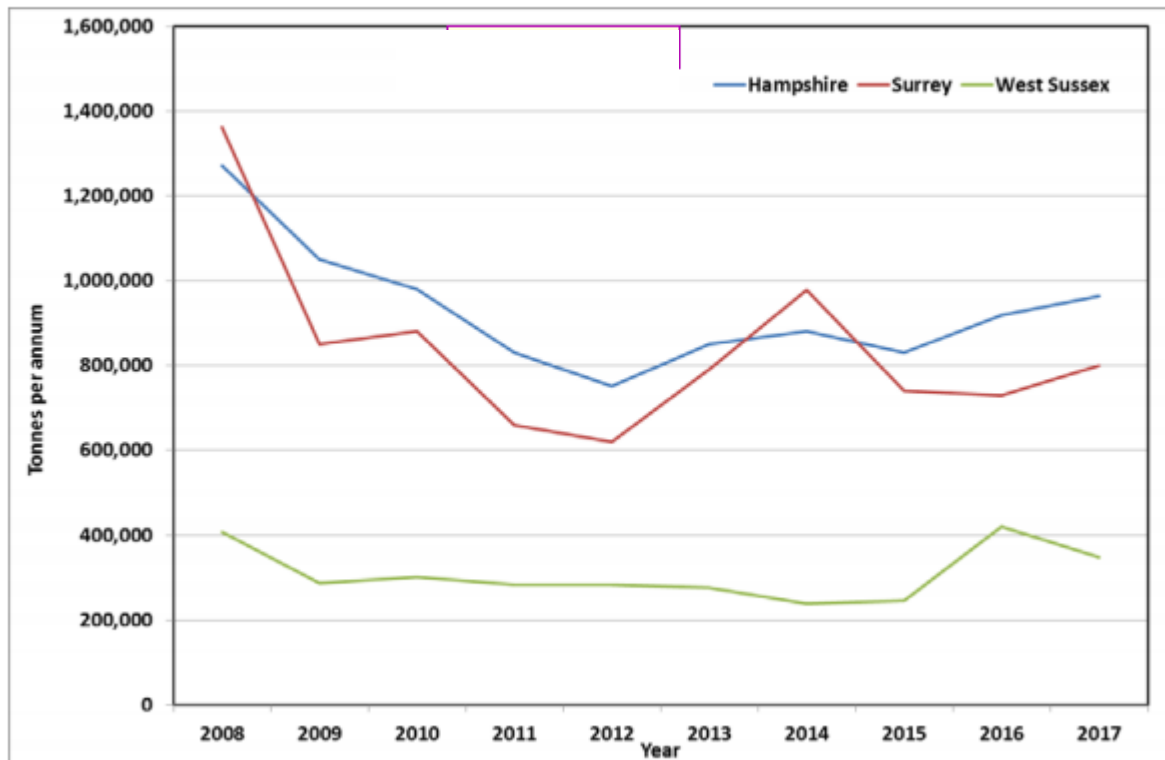
Graph of 2017 WSCC LAA data:



Whilst this chart shows a steep rise in 2016 the trend returns to a downward direction the following year. We believe this downward trend will continue. Sales in West Sussex have remained below 400.000 tonnes. East Sussex sales are also lower over the period. Surrey and Hampshire show a slight rise but they are still well below 2008 levels.

We are advised via a briefing note provided at a meeting with Gillian Keegan MP on Friday 8th March 2019 that the business case for supply/demand uses deeply flawed data that hides behind 'commercial confidentiality' with ranges of exports from West Sussex to other counties as far as Buckinghamshire of between 14% - 94% of total sales. This may or may not be correct but any export of sand should be investigated before the final draft of the SSR is finalised.

Figure 2: Sales of Land-Won Sand and Gravel in Adjoining Authorities (2008 – 2017)



c) Method of calculation future requirements

The LAA of 2017 states that existing reserves are provided by several sites and currently amount to 2,754,000 tonnes. See appendix A Table 6

In Appendix A Table 4 show 3 scenarios of the Local Aggregate Assessment 2017. From this one might assume that the existing supplies available from the 6 sandpits already in use would suffice until 2033. However, by following government advice in how to calculate future demand the requirement suddenly reaches 4,426,720 tonnes (3-year average x 15), 1,593,833 tonnes more than the highest demand scenario in Table 4!

This simplistic and unscientific method of estimating future demand produces artificially high requirements and therefore would drive the planning authority to allocate far more land than is actually required to meet the demand.

d) Housing Demand

Also, we believe that basing future soft sand requirements on future housing demand figures is flawed since the method of construction has changed considerably over the past few years whereby the requirement for wholly brick built houses is reducing. We believe that housing construction uses far less bricks than even a few years ago and that forecasting should take account of changes in the design of housing and therefore the use of soft sand for mortar.

e) Changes in Construction Design

Government Guidelines (National and regional guidelines for aggregates provision in England 2005-2020) support our view that alternatives to the use of basic minerals

should be used when collecting evidence: Section 9 says 'matters for particular attention in monitoring will include evidence of trends in: construction activity within the economy AND the use of alternatives to primary aggregates. Alternatives to primary aggregates have not been considered in this report.

Housing:

Today modern housing construction does not continue the tradition of an 11 inch double brick wall with a cavity. Yes, the cavity is there but the inner skin is very rarely made of brick. The outer skin could be made of brick but even if it was in every case this would halve the need for mortar associated with brick walls. We believe this trend will increase in the future. Many new homes are timber framed with an outer brick skin. In any event there is a need to reduce the reliance on conventional brick design for houses because of the shortage of brick clay.

House design is changing, often being built as a shell and a framework with only brickwork being the outer layer.

Commercial & Public Realm buildings:

Very few industrial buildings use bricks and mortar. One only has to look at the various trading estates on the outskirts of towns to see this is the case. Likewise, supermarkets and other retail businesses are often not constructed of bricks and mortar. Public realm buildings are often built without extensive brickwork. Design features may include some brickwork but not to the extent of the traditionally brick-built Town hall, medical centres, hospitals and other public round buildings.

We have already reached the stage where many industrial and commercial buildings contain very few brick components and therefore very little mortar. Supermarkets shopping centres and trading estate buildings have virtually no bricks in their construction. They may use concrete but don't have large requirements for 'building sand' as they don't use bricks or block construction.

New forms of design:

Over and above this, housing developers and construction companies are looking for new solutions to reduce the cost and time scale it takes to build new homes. Here are some examples of materials and building systems which have obviated the need for bricks and mortar:

Timber frame homes

It's a common sight now to see new homes being built with an internal timber frame, and insulated in a skin and an outer cladding which may or may not be brick.

Modular Units

We believe the trend is towards modular buildings or the use of modular components in any new build. Units are constructed off-site and assembled on site without the use of bricks and mortar. Here is an example from Legal & General:

<https://www.legalandgeneral.com/modular/> Here is an example of a local Sussex company who manufacture modular homes:

<http://www.boutiquemodern.co.uk/>

Structural Insulated Panels (SIPs)

Insulating foam in the centre sandwiched between two oriented standard boards (OSBs). The SIP manufacturer makes the wall panels in a factory

according to your plan. The result is a relatively thin wall that is extremely airtight and has very high R-value.

Precast Concrete

Designed and built in a factory where precast, insulated wall panels are made from concrete. Windows and doors openings are made in the factory as well. Often used for basements and provide a very solid foundation for the rest of a house.

Insulated Concrete Forms (ICFs)

Hollow foam building blocks that interlock together to form a wall. Concrete is poured in the centre resulting in a wall made of concrete sandwiched between two foam panels. Energy efficiency, noise reduction, and a very strong structure.

In conclusion we believe.....

The case for the NEED for Soft Sand is not proven

In summary we believe that there is not a rising demand for this type of mineral and that we see no reason why further sites should be allocated in West Sussex; especially those in the National Park.

Question 1:

a) Which soft sand demand scenario do you think that the Authorities should use?

In our comments on the 'need' aspect for soft sand demand that the method of calculation and factors to be taken into consideration produce a biased answer. The government recommendation for the method of calculation as we have said is simplistic and unscientific. We have also said that simply measuring the need against historical housebuilding completions limits a full prediction as to future demand. In other words the LAA assumes that all houses in the future will be built in the same way. We believe we have sufficiently demonstrated this won't be the case in the future.

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

Yes, we believe there is sufficient evidence to show that the method of construction of houses and other buildings in the future will change significantly. The method of construction and the materials used will not be following a traditional trend. Accordingly the core evidence on which this Soft Sand Review is flawed and no further allocations of sand quarry should be allocated until the metrics upon which predictions are made is brought up to date.

c) Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

available. That being the case we believe there is sufficient time to implement a more thorough and scientific study to estimate future demand before commitments are made to land allocations and therefore to desolation and destruction of the countryside which may turn out to be quite unnecessary.

8. Strategy for Soft Sand Supply

Item 2 of the SSR sets out a Strategy for Soft Sand Supply providing 5 options:

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.

The SDS does not believe that any of the options are suitable as we believe the method of calculation as set out in the LAA provide an unscientific estimate of future needs. See our answer to 'Item 1 – Need'

If our plea to reconsider the method of calculation of estimate in the LAA is ignored then the options A & D should be further investigated.

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, the alternatives have not been identified. We would refer you to **NPPF Para 204**. Where it says:

Planning policies should:

b) So far as practicable, take account of the contribution that substitute or Secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, ...

The SSR report does not state that any investigation is taking place into any alternatives

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, - No development inside the National Park. Our reason for stating this is based on **NPPF para 205:**

When determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy. In considering proposals for mineral extraction, minerals planning authorities should:

a) as far as is practical, 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?

As we state in item 5 SDS Findings – ‘Need’: we believe there may not be a shortfall. In any event, **Para 207 of the NPPF** states “maintaining landbanks of at least 7 years for sand”. The planning period for the Joint Minerals Local Plan (JMLP) is 14 years – to 2033. See:

Para 207 of the NPPF states

Minerals planning authorities should plan for a steady and adequate supply of aggregates by:

f) maintaining landbanks of at least 7 years for sand and gravel and at least 10 years for crushed rock, whilst ensuring that the capacity of operations to supply a wide range of materials is not compromised;

Question 3

Do you have any comments on the draft **SA** (Sustainability Assessment) of the options?

This document can be found here:

<http://www2.westsussex.gov.uk/mlp/csd003.pdf>

This document has 693 pages. We have grave concerns about the findings of this document. There are many worrying statements – too many to reiterate here.

We recommend that this SA document (And therefore the SSR document) should be withdrawn and undergo a complete review. Also, it ought to be examined in public before being used as a basis for planning any mineral extraction.

Here are a few examples of our concerns:

Firstly we are very concerned about this statement in the SA document:

SEA Directive Requirements	Where covered in this SA report
<p>Provision of information on the decision: 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) 	To be addressed after the JMLP is adopted.
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)</p>	To be addressed after the JMLP is adopted.

Why leave it until after the report has been adopted?

Secondly, a number of critical factors that protect the area seem to have been ignored. We refer you to:

Table 4.1: Sustainability Appraisal Framework for the JMLP

Sustainability Appraisal Objectives and Subsidiary questions
<p>Social</p> <p>1. To protect and, where possible, enhance health, well-being and amenity of residents, neighbouring land uses and visitors to West Sussex.</p> <p>Would the option/policy/site:</p> <ul style="list-style-type: none"> ○ Have harmful effects on human health and be sited close to sensitive receptor(s)? ○ Affect amenity through dust and noise (e.g. through blasting/traffic) or vibration? ○ Affect road safety? ○ Have the potential to create land use conflict issues? ○ Provide opportunities for improvements to health, well-being and amenity through enhancements? ○ Create cumulative effects in terms of adverse impacts on environmental quality, social cohesion and inclusion or economic potential?

And

Environmental

5. To protect, and where possible, enhance the landscape, local distinctiveness and landscape character in West Sussex.

Would the option/policy/site:

- Help enable the protection of landscape (particularly AONBs and SDNP) and townscape character?
- Contribute to the restoration of minerals sites, maximising after-use potential for beneficial use (e.g. agriculture, nature conservation, recreation, amenity, water storage, flood management) as appropriate?
- Facilitate the supply and use of local building materials to protect local character?
- Affect dark skies from light pollution?
- Protect and enhance the tranquillity of West Sussex including the SDNP and AONBs (e.g. by minimising noise arising from minerals facilities and transport)?
- Encourage landscape improvement?

6. To protect, conserve and enhance biodiversity including natural habitats and protected species.

Would the option/policy/site:

..... and following sections –too many to list here.

Also we disagree with WSCC assumptions where they say "SA inevitably relies on an element of subjective judgement." This seems very odd - is WSCC saying therefore that National Parks, ANOB and SSSIs are created by a subjective judgement? The creation of these areas have been the result of considerable professional input whereas the LAA calculations have never be tested to see if they have any accuracy in forecasting future demand.

We also have grave concern about the 'Proposed Vision and Strategic Objectives.

How can the JMLP provide a positive vision when the effect of extracting the material will despoil the National Park and cause a major increase in diesel pollution from 40 Ton HGV along narrow roads and through villages in the National Park?

How can the JMLP have positive effects on the social wellbeing of the community – health, wellbeing and amenity of residents?

See extract below:

Proposed Vision and Strategic Objectives (for the Regulation 18 Draft JMLP)

Joint Minerals Local Plan Proposed Vision

- 5.4 The draft Vision for the Joint Minerals Local Plan for West Sussex and the South Downs National Park sets out a positive vision for the future to be achieved by the end of the plan period in 2033 which encourages sustainable economic growth as required by the NPPF, and is likely to have a positive effect on the majority of the SA objectives as shown in **Table 5.1**.
- 5.5 Positive effects have been identified for **social** SA objectives, as the Vision aims for West Sussex and the South Downs National Park to be a special place to live and visit while maintaining thriving communities locally which the production and transportation of minerals does not detract from. The Vision also supports the provision of minerals to enable the delivery of housing and other development to support local social and economic growth. A minor positive effect is therefore expected for SA objective 1 (health, well-being and amenity of residents). A significant positive effect is expected in relation to SA objective 2 (recreation) as the Vision also specifically identifies that the restoration of mineral sites is expected to increase opportunities for recreation and tourism. Protection of recreational assets would benefit the **Cultural** ecosystem services.

9. Potential Sites and Site Selection

Item 4. Of the SSR details 'Issue 3: Potential Sites and Site Selection'

There are 9 'shortlisted' sites:

- Buncton Manor Farm (new site) Washington
- Chantry Lane (Extension) Storrington and Sullington
- Coopers Moor (Extension) Duncton
- Duncton Common (Extension) Duncton and Petworth
- East of West Heath Common (Extension) Harting and Rogate
- Ham Farm (new site) Steyning and Wiston
- Minsted West (Extension) Stedham with Iping
- Severals East (new site) Woolbeding with Redford
- Severals West (new site) Woolbeding with Redford

As we have stated not new sites are need. That said here are our comments:

Value of the Environment

No 'monetary value' placed on the environmental cost of mining in a National Park and the resultant despoliation. There should be a comparison made between the loss of natural landscape and the value of the mineral won from excavation and mining.

Hydrology

We are concerned about the risk to negative effects to the hydrology of our heathland sites, many of which are SSSIs and lie on building sand. Quarrying can seriously change the hydrological regime on any given site and through that bring about vegetation changes to the SSSI, that consideration does not appear to be covered in the "Water Environment" considerations. Coopers Moor (SDNP) Duncton Common is a classic example, as it runs very close to Lavington Common SSSI which has some excellent wet heath. That that wet heath could be seriously affected by lowering of the water table brought about by nearby extraction and or dewatering.

Severals East and West

The two sites, Severals East and West, total 75 ha and are in single ownership of the Cowdray estate. They comprise large areas of plantation forest including areas of ancient woodland in Severals West. They are located within an extensive tract of greensand west of Midhurst and between Midhurst Common immediately to the east and a series of commons (Stedham, Iping and Trotton) to the west.

They are criss-crossed by a network of public footpaths, bridleways and permissive paths and the Serpent Trail links them all. They provide valuable opportunities for quiet informal recreation for local residents and visitors to this deeply tranquil area of the National Park which is easily accessible by the A272 and with a bus service between Petersfield and Midhurst.

Even well before the designation of the South Downs National Park, the two Severals sites were not allocated in the West Sussex Minerals Local Plan of 2003 and were not considered acceptable in the Minerals Issues and Options paper of 2005 due to the landscape and conservation impact of mineral working. They were also rejected in the 2018 joint Minerals Local Plan for the same reasons and having regard to the NPPF which affords the highest protection of land within a National Park. The Severals East and West are identified in the current consultation as having a medium/ high sensitivity to landscape and nature conservation; Various Sites of Nature Conservation Importance (SNCI) lie close to the Severals on the east, north and west.

Although the Severals lie adjacent to the A272, even if HGVs were required to access the sites only from the west (i.e. from the A3) and so avoiding Midhurst, they would have an environmental impact on the two close-knit villages of Trotton and Rogate which already suffer from noise and pollution of HGVs.

Large amounts of money have been spent to restore and improve the Severals heathland (estimated to be £300,000 to Cowdray Estate and £2.47 million to Heathlands Reunited).

Revisiting this issue every few years is very costly for residents and parishes. It causes great distress, onus should be on those offering sites why the 'exceptional reasons' for exclusion no longer exist.

Road Access

With the development of quarries comes HGV traffic. We are concerned that no estimates of lorry movements have been included in the SSR. This should be added before the plans are progressed. The public should then be allowed to comments on any traffic modelling. Many sections of A roads east to west are unsuitable for an increase in HGV traffic, such as:

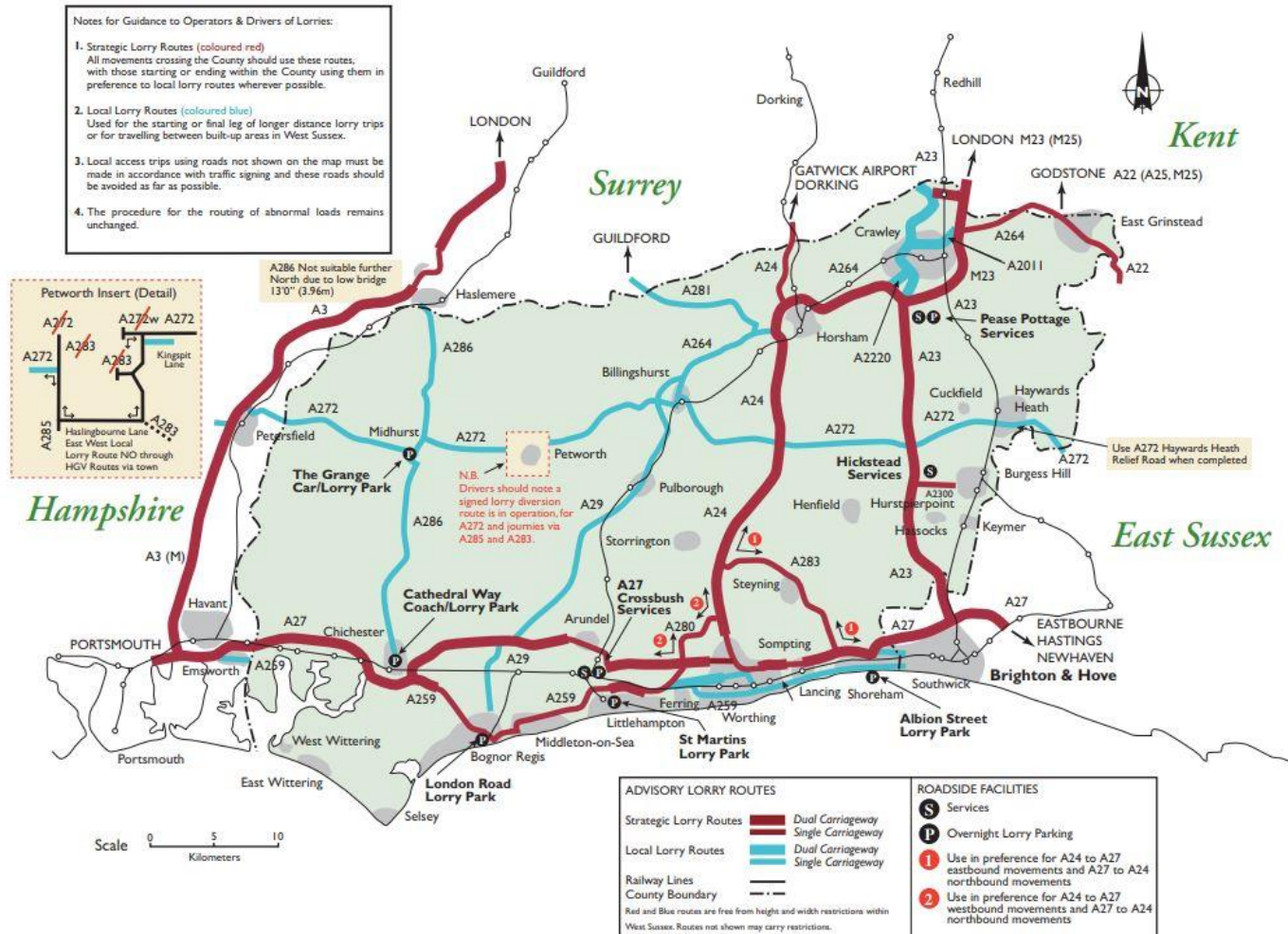
Duncton Common W of Heath End and Coopers Moor S of Heath End:
Access via A285 north across the **narrow medieval Coultershaw bridge** and through Petworth or south to the A27 via Duncton and Halnaker. The A285 is known as the most dangerous single carriageway A class road in England.

Minsted West:
Access along the A 272 east through Petworth or west across the narrow **medieval light-controlled Trotton bridge** and the **villages of Trotton, Rogate** and Sheet to the A3.

East of West Heath Common:

Via a narrow lane across medieval bridge to the A272 and though Sheet to the A3.

WSCC Advisory Lorry Route shows that the access road for all 'shortlisted' site are via, what they define as single carriageway 'local' routes.



10. Questions 4 to 9

Here are our answers to these questions:

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

The process is too simplistic and the resulting analysis in the SA is, we believe, bias toward increasing supply. Simply, the WSCC made a call for sites and naturally site owner would put forward potential site because of the potential economic gain. This inevitably leads to the 'easy' solution by the Industry without costing the harm to the environment.

Question 5 Do you have any comments on the nine potential sites identified in the table above?

See section 7 of this submission.

Question 6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the 4SR?

These should not be considered before the LAA is revised as we recommended

Question 7 Are there any sites that we should be considering, that are not included within the 4SR report?

No

Question 8 Do you have any comments on the SA of the potential sites?

See our comments under section 6 above

Question 9 Do you have any comments on the proposed site selection strategy and guiding principles?

Please take account of SDNP policies including:

- Core Policy SD1: Sustainable Development
- Core Policy SD2: Ecosystem Services
- Strategic Policy SD4: Landscape Character
- Strategic Policy SD9: Biodiversity and Geodiversity
- Development Management Policy SD11: Trees, Woodland and Hedgerows
- Strategic Policy SD17: Protection of the Water Environment
- Strategic Policy SD19: Transport and Accessibility
- Strategic Policy SD45: Green Infrastructure

Are there any other factors that should guide the selection of allocated site(s)?

Appendix A - Relevant SDNPA Local Plan Policies

The SDS believe that these extracts of the SDNPA Local Plan should be taken into consideration in reviewing the SSR. Further that, by their very nature would require a complete review on the SSR

Core Policy SD1: Sustainable Development

The National Park purposes are i) to conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and ii) to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. Where it appears that there is a conflict between the National Park purposes, greater weight will be attached to the first of those purposes. In pursuit of the purposes, the National Park Authority will pay due regard to its duty to seek to foster the economic and social well-being of the local communities within the National Park.

Planning permission will be refused where development proposals fail to conserve the landscape, natural beauty, wildlife and cultural heritage of the National Park unless, exceptionally:

Core Policy SD2: Ecosystem Services

Development proposals will be permitted where they have an overall positive impact on the ability of the natural environment to contribute goods and services. This will be achieved through the use of high quality design, and by delivering all opportunities to:

- Sustainably manage land and water environments;
- Protect and provide more, better and joined up natural habitats;
- Conserve water resources and improve water quality;
- Reduce levels of pollution;
- Improve opportunities for peoples' health and wellbeing; and

Strategic Policy SD4: Landscape Character

Development proposals will only be permitted where they conserve and enhance landscape character by demonstrating that:

They will safeguard the experiential and amenity qualities of the landscape;

Strategic Policy SD9: Biodiversity and Geodiversity

Development proposals will be permitted where they conserve and enhance biodiversity and geodiversity, giving particular regard to ecological networks and areas with high potential for priority habitat restoration or creation Prior to determination, up-to-date ecological information should be provided which demonstrates that development proposals:

Development Management Policy SD11: Trees, Woodland and Hedgerows

Development proposals will be permitted where they conserve and enhance trees, hedgerows and woodlands.

Development proposals that affect trees, hedgerows and woodland must demonstrate that they have been informed by a full site survey, including an Ecological Survey,

Strategic Policy SD17: Protection of the Water Environment

Development proposals that affect groundwater, surface water features, and watercourse corridors will not be permitted unless they conserve and enhance the following:

Water quality and quantity, and help achieve requirements of the European Water Framework Directive, or its replacement;

Ability of groundwater, surface water features and watercourse corridors to function by natural processes throughout seasonal variations, within the immediate vicinity, and both upstream and downstream of the site of the proposal; and

Specifically for surface water features and watercourse corridors:

Biodiversity;

Historic significance;

Character, appearance, and setting;

Public access to and along the waterway for recreational opportunities; and

Ability for maintenance of the watercourse, including for food risk management purposes.

Strategic Policy SD19: Transport and Accessibility

Development proposals will be permitted provided that they are located and designed to minimise the need to travel or and promote the use of sustainable modes of transport.

Development Management Policy SD21: Public Realm, Highway Design and Public Art

Development proposals will be permitted provided that they protect and enhance highway safety and follow the principles set out in the document, Roads in the South Downs, or any future replacement.

Development will not be permitted where it would reduce the biodiversity, landscape and amenity value and character of historic rural roads. Particular attention will be given to new access points and other physical alterations to roads, and to the impacts of additional traffic.

Strategic Policy SD45: Green Infrastructure

Development proposals will be permitted where they demonstrate that they:

Maintain or enhance green infrastructure assets, green infrastructure links and the overall green infrastructure network; and

Provide new green infrastructure or improvements to existing green assets and green linkages, which are integrated into the development design that meets the needs of communities both within and beyond the site's boundaries.

Appendix B - Soft Sand 'Demand'

Table 4: Soft sand demand forecasts 2018 - 2033 (tonnes)

	Demand Forecast Scenarios		
	1	2	3
Assumptions applied	None (10 yr. avg. only)	1 and 2	1
10 year average	293,737		
Additional demand for housing	n/a	71,637	78,722
Total Annual requirement	293,737	365,374	372,459
Total requirement over Plan period (2018 - 2033)	4,406,062	5,480,613	5,586,887
Current reserves	2,754,000		
Shortfall	1,652,062	2,726,613	2,832,887

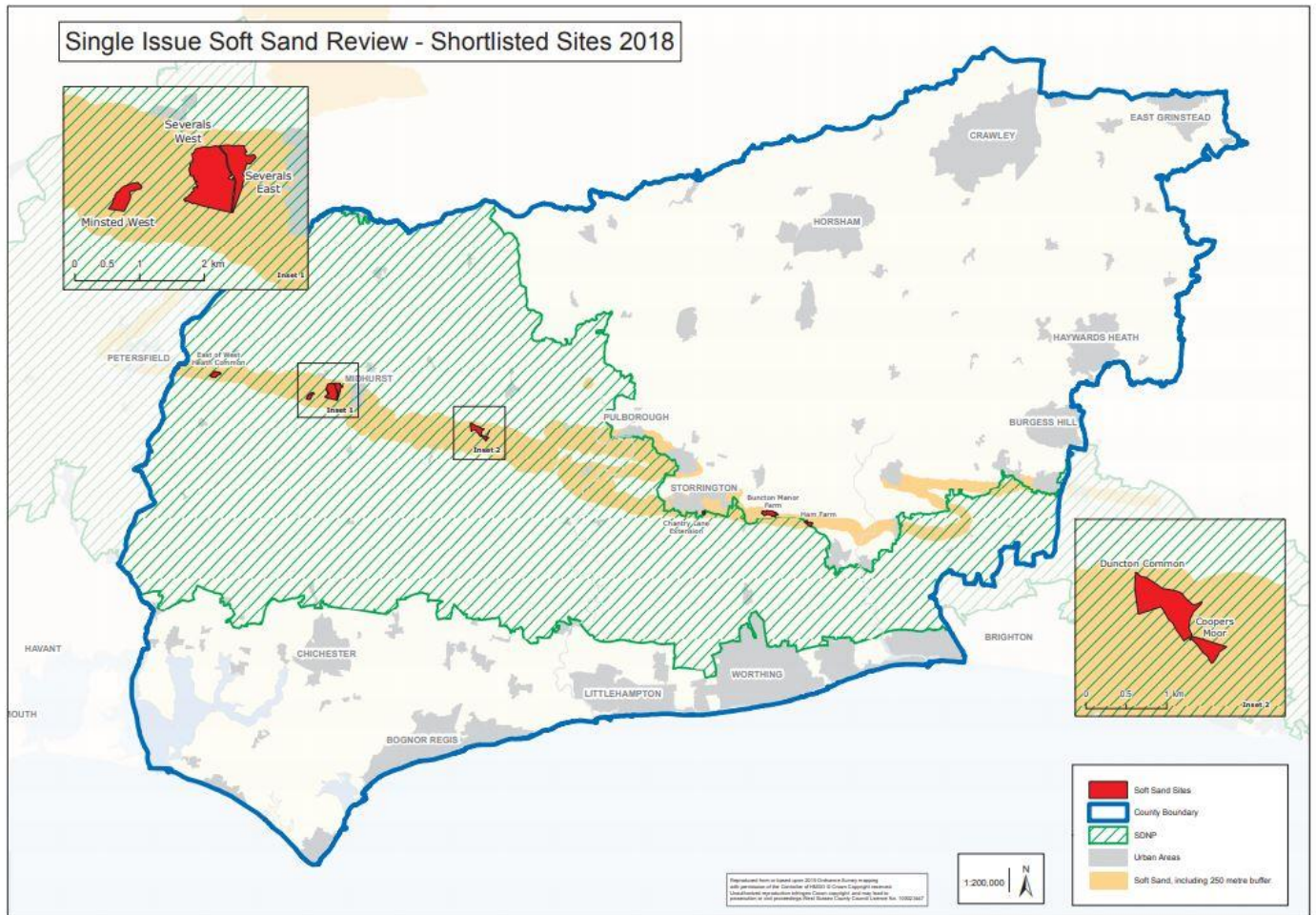
Appendix C – Existing Permitted Sand & Gravel Quarries in West Sussex

Table 6: Permitted Sand and Gravel Quarries in West Sussex (2018)

Soft Sand			
Location	Site	Operator	Status
SDNP	West Heath Quarry, West Harting, Petersfield	CEMEX UK Operations	Active – Sand extraction
SDNP	Heath End Quarry, Station Road, Heath End, Petworth ¹⁰	Dudman Group Ltd.	Active – Sand extraction.
West Sussex	Rock Common Sandpit, Washington, Pulborough	Dudman Group Ltd.	Active - Sand extraction.
West Sussex	Sandgate Park Quarry, Water Lane, Sullington, Storrington	CEMEX UK Operations	Active – Sand extraction.
West Sussex	Washington Sand Pit, Hampers Lane, Sullington	Britaniacrest Recycling Ltd.	Active – Sand extraction.
West Sussex	Chantry Sand Pit, Chantry Lane, Storrington	Dudman Group Ltd.	Inactive
Sharp Sand and Gravel			
West Sussex	Land at Kingsham, South of Chichester, Chichester, West Sussex	Dudman Group Ltd.	Active - Sand & gravel extraction.

NB: In accordance with the PPG, mineral sites that are subject to a stalled review of their planning conditions have not been included in the assessment of existing reserves.

Appendix D – ‘Shortlisted sites



Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-03-18 11:27:30

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

Mr

First name:

Owen

Last name:

Richards

Job title (where relevant):

Parish Clerk

Organisation or affiliation (where relevant):

Thakeham Parish Council

A2 Client Details if applicable

Title:

First name:

Last name:

Job title (where relevant):

Organisation or affiliation (where relevant):

Mr

A3 Contact Address Details

Same as details provided in A1

Name:

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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[Redacted]

[Redacted]

[Redacted]

Other:

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

No view.

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

No view.

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

No view.

Part C - Issue 2

2a Do you consider that all "reasonable alternatives" for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

No view.

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

See response to q. 5.

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

No view.

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

See response to q.5.

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

No.

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Chantry Lane

Tick all the site boxes that apply (above) and provide comments below.:

Thakeham Parish Council wishes to register significant concerns regarding the Chantry Lane extension option

1. Impact on landscape and views.

Council is seriously concerned about the visual impact of this option. The SDNPA Addendum to Landscape Sensitivity Study designates the Chantry Lane extension option as Amber, with the potential to cause significant urbanising impacts on the existing character and views of the chalk ridge - most notably but not exclusively in relation to access works required for new north-east road connection to the A283. The proposal may therefore not be acceptable in terms of landscape impact, as it presents risks of localised visual intrusion, landform changes, and cumulative impact on the landscape character. The site is within the SDNP, and the general development policy within the park area is a presumption of refusal of major development proposals unless exceptional circumstances exist and the development is in the public interest. The level of consideration provided by this site shortlisting exercise falls well short of demonstrating that those circumstances exist.

2. Roads and traffic aspects

Council would strongly underline the concerns already noted in the report relating to routing of the additional HGV traffic that this option would create. It is clear

that creating a new access point for slow-moving HGV vehicles opposite the Water Lane jct on the A283 is likely to exacerbate existing safety risks at this point, unless managed by new traffic lights that would interrupt the already sticky/heavy flow of traffic on this route. It would also be critical that any travel plan relating to this option would require all HGV traffic to stick to the A283/A24 route eastwards, and rule out use of Water Lane or the B2139 as an alternative route - as those routes already bring excessive HGV traffic through residential areas, the main local school hub on Rock Road and the very narrow and steeply banked sections of the B2139 in central Thakeham.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

No.

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

No view.

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

See comments under 5.

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)?

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)?:

No.

Part E - About You (The Equality Act 2010)

More questions About You

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██████



Economy & Planning Services

Contact: [REDACTED]

Date: 8 March 2019

Direct Line: [REDACTED]

Email: [REDACTED]

Forward Planning
Crawley Borough Council
Town Hall
The Boulevard
Crawley
West Sussex
RH10 1UZ

By Email Only

Dear Sir/Madam,

RE: SOFT SAND REVIEW OF THE WEST SUSSEX JOINT MINERAL LOCAL PLAN – ISSUES AND OPTIONS CONSULTATION

Dear Sir/Madam,

Thank you for inviting Crawley Borough Council to provide feedback on the above consultation.

The council does not have specific comments on the consultation itself, though wish to flag as a point of clarification relating to the Crawley urban area as shown at Appendix A of the *Single Issue Soft Sand Review – Issues & Options Consultation (Reg.18)*.

As advised by CBC in relation to the Mineral Local Plan, the document uses the Built up Area Boundary, as identified in the Crawley Borough Local Plan, as a means of delineating Crawley's urban area. This approach is supported by the Council.




However, we note that the document omits Gatwick Airport and Lowfield Heath main employment areas. These are both significantly built-up areas that would for the purposes of minerals planning likely be considered as 'urban'. Please see the map overleaf for detail of these locations.

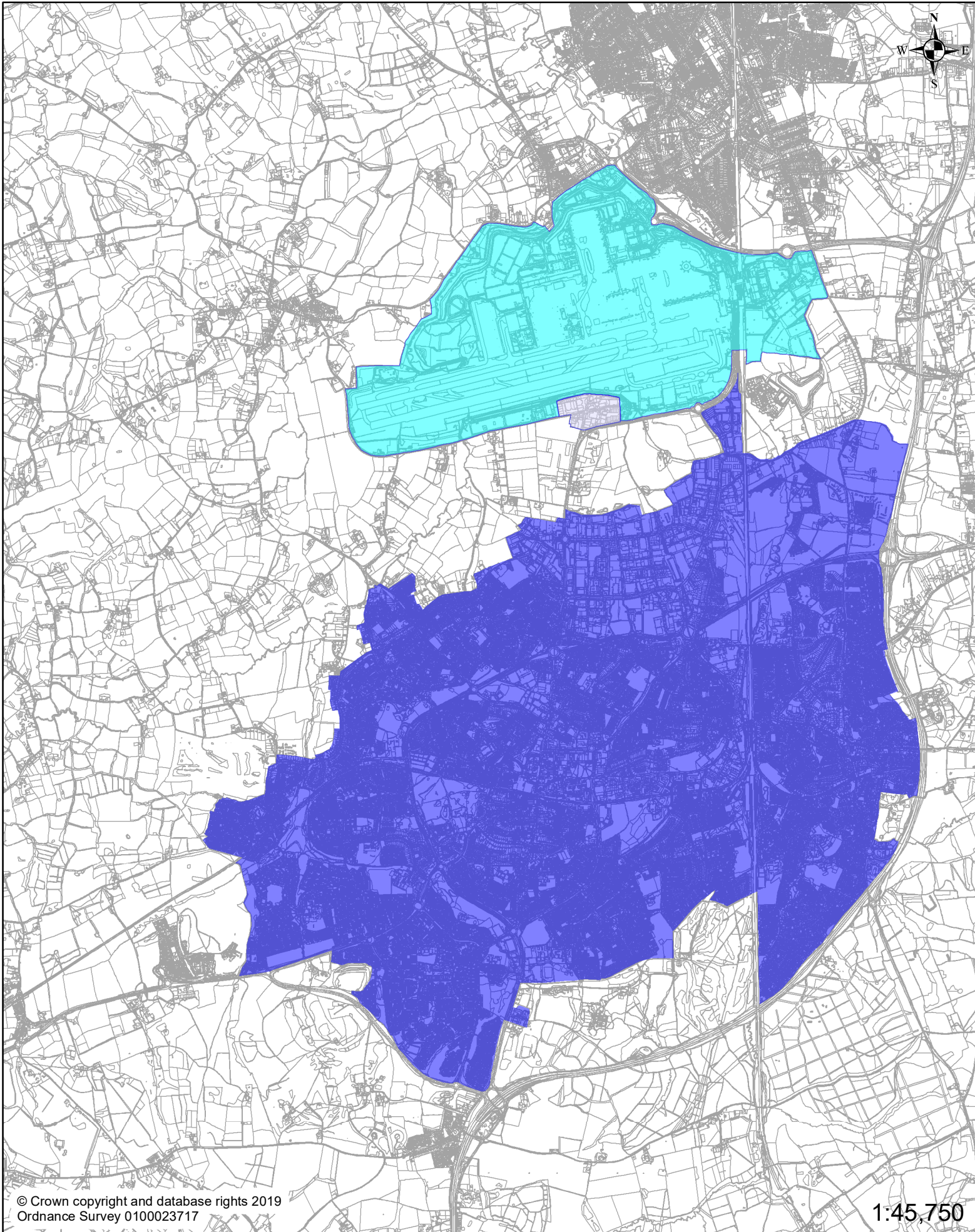
CBC is happy to provide the necessary GIS data for both sites, which may assist in providing clarity on mapping that forms part of the Mineral Local Plan. Should you require this information, please do contact me via the details above.

Yours Faithfully,

[REDACTED]
Senior Planning Officer

Crawley Urban Areas: Map for Mineral Planning

-  Gatwick Airport Boundary
-  Built-Up Area Boundary (Policy CH9 & EC9)
-  Lowfield Heath



YOUR LONDON AIRPORT
Gatwick

06 FEBRUARY 2019

Planning Services (Ref. SSR)
West Sussex County Council
County Hall
Chichester
West Sussex P019 1RH

Dear Sir/Madam

Re: Soft Sand Review of the West Sussex Joint Minerals Local Plan: Issues & Options Consultation (Regulation 18)

Our Ref: LGW3815

Thank you for your email/letter dated 21 January 2019, with regard to the above mentioned consultation.

We were very pleased to see references to Airport Safeguarding Zones included in the document for which we thank you. We would however ask for some minor amendments to be made as follows:

'Soft Sand Selection Report'

In Appendix 1: Key Assessment Information & Criteria on page 19 mention has been made of Airport Safeguarding Zones. It mentions types of developments that may be bird attractants, but attention also needs to be drawn to other safeguarding considerations, for example:

- Building/structures and equipment heights need to be assessed to ensure that they do not infringe the Obstacle Limitation Surfaces (OLS) that extend out to 15km from the airport. The OLS ensure that aircraft are kept a safe distance from any obstacles
- Building/structures and equipment heights need to be assessed to ensure that they do not impact on any navigational aids utilised by the airport.
- If a site is close to the airport lighting will also need to be assessed to ensure that there is no glare to pilots and air crew and that any lighting cannot be confused with aeronautical ground lighting.

YOUR LONDON AIRPORT

Gatwick

The 13km distance as mentioned in the constraints column relates to the distance within which developments need to be assessed to ensure there will be no bird attractants. We would be grateful if this could be amended to 15km to reflect all of the above mentioned safeguarding considerations.

Under the 'Site Assessment Framework' table on page 28 of the 'Soft Sand Selection Report' we would ask that mention be made of building/structure and equipment heights and lighting considerations within the 15km zone as detailed above.

In Appendix 4 of the 'Soft Sand Selection Report' under 'Buncton Manor Farm' on page 43 and under 'Ham Farm' on page 90, it says that the sites are within the aerodrome safeguarding zone for Shoreham Airport and it mentions bird hazard management. We would suggest that the other safeguarding considerations are included as mentioned above.

Airports are under constant pressure from development and it can be especially difficult for the smaller airports such as Shoreham who aren't officially safeguarded.

Thank you for giving us the opportunity to comment on this document, if you have any queries please do not hesitate to contact me.

Please be advised that the advice given is informal and without prejudice to the consideration of any planning application which may be referred to us pursuant to Planning Circular 01/2003 in consultation under the safeguarding procedure.

If you have any queries please do not hesitate to contact me.

Yours sincerely

Amanda Purdye, Aerodrome Safeguarding
For and on behalf of Gatwick Airport Limited



[REDACTED]

[REDACTED]

Sent: 04 March 2019 08:37
To: PL MWDF
Subject: RE: Soft Sand Review of the West Sussex Joint Minerals Local Plan - Issues and Options Consultation (Reg.18)

Dear Rupy

Thank you for the opportunity to comment on the above consultation. We do not have any comments to make on its contents.

We would, however, like to be kept up to date on further consultations.

Kind regards
Tracey



Tracey Flitcroft
Principal Planning Officer
Planning Policy
Chichester District Council



Sent: 21 January 2019 10:49
Subject: Soft Sand Review of the West Sussex Joint Minerals Local Plan - Issues and Options Consultation (Reg.18)

Dear Stakeholder,

West Sussex County Council and the South Downs National Park Authority are working in partnership on a Soft Sand Review of the [West Sussex Joint Minerals Local Plan](#), as required by Policy M2 of the adopted Plan.

An Issues and Options consultation document has been prepared, alongside a number of other documents. These are being made available for comment in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, until 18 March 2019.

Attached to this email is a covering letter providing more information about the Soft Sand Review consultation.

Kind regards,

Planning Policy and Infrastructure Team.

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From: [REDACTED]
Sent: 19 March 2019 11:40
To: PL MWDF
Subject: Single Issue Soft Sand Review Reg 18 Consultation - Environment Agency response
Attachments: 151116 Site Assessment EA Further Comments.docx

Dear all

We have reviewed the Issues and Options consultation document on the Single Issues Soft Sand Review for the West Sussex Joint Minerals Local Plan. Apologies that we did not get our response to you yesterday but I trust that comments below will still be useful in preparing the next stage of the document.

Our response relates to Issue 3 the Potential Sites and Site Selection and revisits comments that we have made to you previously on previous version of the Minerals Local Plan during its preparation. We have focused on the shortlist of nine potential sites.

Below is our assessment of the sites shortlisted in terms of environmental constraints:

Bunton Manor Farm	Soft Sand	Proximity to Windmill Landfill Site. Groundwater impacts.	Depth of quarrying - we would not want to see any below groundwater table quarrying. As groundwater is being dewatered at Rock Common, groundwater levels underneath the site are unlikely to be representative of natural conditions. Therefore groundwater monitoring and an assessment will have to be made on the natural groundwater table at this site. Windmill Landfill lies adjacent to the site - the development must not have any detrimental impact upon the infrastructure of the landfill. Therefore an assessment needs to be made on what is a safe working/quarrying distance that can be made. Constraints include but not limited to locations of boreholes (Gas & Groundwater) infrastructure, engineered liner and surface water drainage system.
Chantry Lane Extension	Soft Sand	Possible WFD impacts – watercourse adjacent to site tributary to River Stor and drains to Arun.	Mainly Gault Clay over Folkestone Beds to the west. If used for sand, Gault clay needs to be removed – recommend consideration of any impacts.

Coopers Moor	Soft Sand	Part FZ3 WFD impacts - Watercourse running through the site drains into the Rother to the Arun.	Below groundwater table working – more complex operation and would need to consider impacts on drainage/flood risk. Site lies on Folkestone Beds. Groundwater levels likely to be high. Depth of working and de-watering operations will need to be explored and assessed. No outright objection though would prefer no working below groundwater table. Risk Assessment of the water environment (Qualitative Hydrological & Hydrogeological Risk Assessment) recommended and suitable site allocation criteria included.
Duncton Common	Soft Sand	FZ2/3 along eastern edge WFD impacts – Costers Brook, drains to Rother to Arun	Below groundwater table working – more complex operation and would need to consider impacts on drainage/flood risk. Site lies on Folkestone Beds with Marehill Clay outlier on top. Groundwater levels likely to be high. Depth of working and de-watering operations will need to be explored and assessed. No outright objection though would prefer no working below groundwater table. Risk Assessment of the water environment (Qualitative Hydrological & Hydrogeological Risk Assessment) - recommended and suitable site allocation criteria included.
East of West Heath Common	Soft Sand	FZ2/3 at southern edge	Marehill Clay above Folkestone Beds (Principal). Groundwater levels likely to be high. Depth of working and de-watering operations will need to be explored and assessed. No outright objection though would prefer no working below groundwater table. Risk Assessment of the water environment (Qualitative Hydrological & Hydrogeological Risk Assessment) – recommended and suitable site allocation criteria included.
Ham Farm	Soft Sand	Several surface water streams run along the boundaries of the site.	Mainly Gault Clay over Folkestone Beds. If used for sand, Gault clay needs to be removed – recommend consideration of any impacts.
Minsted West	Soft Sand		Extension to existing site (Minsted) – current concerns that the operators at Minsted are not satisfying the planning conditions and as such there are potential hydrological impacts on Iping Common SSSI. We recommend that until the condition is met and any risks are understood and mitigated that a further extension to this site should not come forward.

			<p>Site lies on Folkestone Beds. Groundwater levels likely to be high. Depth of working and de-watering operations will need to be explored and assessed. No outright objection though would prefer no working below groundwater table.</p> <p>Risk Assessment of the water environment (Qualitative Hydrological & Hydrogeological Risk Assessment) - recommended and suitable site allocation criteria included.</p>
Severals East	Soft Sand	Possible Water Framework Directive (WFD) impacts – drainage to watercourse which drains to Rother to Arun.	<p>Site lies on Folkestone Beds. Groundwater levels likely to be high. Depth of working and de-watering operations will need to be explored and assessed. No outright objection though would prefer no working below groundwater table.</p> <p>Risk Assessment of the water environment (Qualitative Hydrological & Hydrogeological Risk Assessment) - recommended and suitable site allocation criteria included.</p>
Severals West	Soft Sand	FZ3 western edge of site WFD impacts – watercourse along eastern edge, drains to Rother to Arun	<p>Site lies on Folkestone Beds. Groundwater levels likely to be high. Depth of working and de-watering operations will need to be explored and assessed. No outright objection though would prefer no working below groundwater table.</p> <p>Risk Assessment of the water environment (Qualitative Hydrological & Hydrogeological Risk Assessment) – recommended and suitable site allocation criteria included.</p> <p>A suitable buffer should be considered to the floodplain.</p>

We would wish to see these issues considered further if the sites are allocated for soft sand and clear site allocation criteria should be included to ensure that any risks to the water environment are fully considered. Attached to this email are further site comments we made in November 2015 these include some site specific criteria that we would wish to be included for East of West Hoath Common, Minsted and Severals West.

We would continue to support the removal of the Rock Common sites for consideration. Due to the complex nature of the situation at Rock Common we support that these sites are not included.

We would be happy to meet to discuss any of these sites further as you progress through the development of the Review. Apologies for the delay in our comments.

Kind regards,

Hannah



Please note I work part time Monday to Wednesday and Thursday am.

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[REDACTED]

From: [REDACTED]
Sent: 19 March 2019 14:31
To: PL MWDF
Subject: Quarrying at The Severals

I am hoping this is the correct address to complain about the above. We discussed this at our last Parish council meeting and were all in agreement that it is a disgrace that Lord Cowdray has even contemplated such an idea. As part of the SDNP, The Severals is such a beautiful part of Midhurst where walkers and riders are free to enjoy the countryside.

Imagine the effects on the narrow roads leading into Midhurst and also on to the Petersfield. road. Having reported endless potholes this winter that WSCC have still failed to fill in, the situation will only get worse in future years. As we all know from the necessary roadworks at Rumbolds hill last year caused as we are told be the endless lorries coming through the town, and Lord Cowdray wants to add to this mayhem that comes through Midhurst on a daily basis.

What will the effects be on wildlife? Since the SDNP took control there has been an increase in refusing planning permission for reasons relating to wildlife such as disturbing the bats in peoples homes, following very costly surveys. I would expect such rigour in this case.

I hope that the SDNP and CDC will do what is right for Midhurst and refuse this application.

Yours sincerely

Anthea Philip
Chairman Heyshott Parish Council

Date: 18 March 2019
Your ref: 271187



Customer Services
Hombear House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

██████████
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BY EMAIL ONLY

██████████

Planning consultation: Soft Sand Review of the West Sussex Joint Minerals Local Plan - Issues and Options Consultation

Thank you for your consultation on the above application.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Overarching advice

Net Gain

We advise that the government has recently consulted on and announced a move to mandate net gain for biodiversity in new development.

We advise that your Authority considers how the Plan would demonstrate a *net gain* in biodiversity. The Plan includes a number of allocations which contain existing biodiversity assets including ancient woodland. Planning at a strategic level should include this.

Net gain through development is a key principle in the government's [25 Year Environment Plan](#)¹, and Defra has recently consulted² on making it mandatory. It is also required by national planning policy ([National Planning Policy Framework](#)) as follows:

- a) **Para 170.** *Planning policies and decisions should contribute to and enhance the natural and local environment by:*
 - d) *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*

- b) **Para 174.** *To protect and enhance biodiversity and geodiversity, plans should:*
 - a) *Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and*

¹ <https://www.gov.uk/government/publications/25-year-environment-plan>

² Defra consultation on mandatory net gain: <https://consult.defra.gov.uk/land-use/net-gain/>

local partnerships for habitat management, enhancement, restoration or creation; and
b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

Ebernoe Common SAC, The Mens SAC and Singleton and Cocking Tunnel SAC

The removal of habitats for mineral extraction could potentially impact on the above International wildlife sites via impacts to flightlines or foraging areas of the barbastelle and Bechstreins bat. These are notified features of the SACs.

In addition to the SACs containing their roosting sites the bats also require access to habitats outside the boundary of the SACs. This habitat is integral to supporting bats associated with the SACs and is often referred to as functionally- linked habitat. Such functionally linked habitat includes the following:

Key Conservation Areas

Based upon published data³, Natural England recommends that the following impact zones around the SACs are included:

- 6.5km Key conservation area – all impacts assessed (see Table 1)
- 12km Wider conservation area – significant impacts or severance to flightlines to be considered
-

The 6.5 km includes the Key conservation area in which all impacts *must* be considered as habitats within this zone are considered critical for sustaining the populations of bats within the SACs.

The 12km encompasses the wider conservation area which is the full extent of the range of foraging areas required by the bats.

Therefore the removal of habitats and linear features within the Plan has the potential to impact on the above conservation areas. South Downs National Park Local Plan includes robust policy protection within 12km of these sites. Mineral extraction within these zones will need to determine any impact to these habitats.

³ Scoping study for the West Sussex Bat Project - Assessing current evidence to recommend conservation measures important to barbastelle and Bechstein's bats of consequence in the project area A report to Natural England. Bat Conservation Trust 2015
Bat conservation Trust Core Sustenance Zones http://www.bats.org.uk/data/files/Core_Sustenance_Zones_Explained_-_04.02.16.pdf

Soil, Agricultural Land Quality and Reclamation

The Minerals Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our well-being and prosperity. Decisions about minerals development and restoration should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver, for example:

1. Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society; for instance as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. The [Natural Environment White Paper \(NEWP\) 'The Natural Choice: securing the value of nature'](#) (Defra, June 2011), emphasises the importance of natural resource protection, including the conservation and sustainable management of soils, for example:
 - A Vision for Nature: 'We must protect the essentials of life: our air, biodiversity, soils and water, so that they can continue to provide us with the services on which we rely' (paragraph 2.5).
 - Safeguarding our Soils: 'Soil is essential for achieving a range of important ecosystem services and functions, including food production, carbon storage and climate regulation, water filtration, flood management and support for biodiversity and wildlife' (paragraph 2.60).
 - 'Protect 'best and most versatile' agricultural land' (paragraph 2.35).
2. The conservation and sustainable management of soils also is reflected in the [National Planning Policy Framework \(NPPF\)](#), particularly in paragraphs 170, 171 and 204. When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production. Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 118 of the NPPF, for example by:
 - Safeguarding the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.
 - Not identifying new sites or extensions to existing sites for peat extraction.Avoiding development that would disturb or damage other
 - 'Protect 'best and most versatile' agricultural land' (paragraph 2.35).
3. The conservation and sustainable management of soils also is reflected in the [National Planning Policy Framework \(NPPF\)](#), particularly in paragraphs 170, 171 and 204. When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production. Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 118 of the NPPF, for example by:
 - Safeguarding the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.
 - Not identifying new sites or extensions to existing sites for peat extraction.

- Avoiding development that would disturb or damage other soils of high environmental value (eg wetland and other specific soils contributing to ecological connectivity), and, where development is proposed.
 - Ensuring soil resources are conserved and managed in a sustainable way.
4. To assist in understanding agricultural land quality within the plan area and to safeguard 'best and most versatile' agricultural land in line with paragraph 170 and 171 of the National Planning Policy Framework, strategic scale Agricultural Land Classification (ALC) Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally free of charge by contacting Natural England. Some of this data is also available on the www.magic.gov.uk website. The planning authority should ensure that sufficient site specific ALC survey data is available to inform decision making. For example, where no reliable information was available, it would be reasonable to expect that developers should commission a new ALC survey for any sites they wished to put forward for consideration in the Local Plan.
 5. General mapped information on soil types, including peaty soils, is available as 'Soilscapes' on the www.magic.gov.uk and also from the LandIS website <http://www.landis.org.uk/index.cfm> which contains more information about obtaining soil data.
 6. Where minerals underlie the best and most versatile agricultural land (Grades 1, 2 and 3a in the Defra ALC system) it is particularly important that restoration and aftercare preserve the long-term potential of the land as a national, high quality resource. Where alternative afteruses (such as forestry and some forms of amenity, including nature conservation) are proposed on the best and most versatile agricultural land, the methods used in restoration and aftercare should enable the land to retain its longer-term capability, thus remaining a high quality resource for the future.
 7. Reclamation to non-agricultural uses does not mean that there can be any reduced commitment to high standards in the reclamation. Such reclamations require equal commitment by mineral operators, mineral planning authorities and any other parties involved to achieve high standards of implementation.
 8. In line with the the [Planning Practice Guidance](#) to support the NPPF; we advise that a soil and ALC assessment should be carried out as part of the site selection process, (see Sections titled [Natural Environment - Brownfield Land, Soils and Agricultural Land](#) (Paras 025 & 026 refer) and [Assessing environmental impacts from minerals extraction](#) (Para 013). It should be noted that some of the potential sites may already have had such surveys carried out, for example by MAFF (see point 3 above), or by potential developers. These surveys can then be used to inform any subsequent soil moving and site restoration plans. Further information can be found in the Defra [Guidance for Successful Reclamation of Mineral and Waste sites](#) and [Good Practice Guide for Handling Soils](#).

Advice on plan specifics

Question 2

We note and welcome that the options appraisal includes impacts to the Special Qualities of the South Downs National Park. We would advise however that this also includes the Environmental Impact of schemes from statutorily protected sites and priority habitats to local wildlife sites. The SA will need to include this.

4.8 We advise that compensation is a last resort when correctly applying the mitigation hierarchy as detailed within the NPPF. We advise that the following paragraph: *Therefore, any potential adverse impacts must either be prevented or be capable of being minimised, mitigated, or compensated for to an acceptable standard* is amended to state as a last resort in order to reflect this. The current wording is misleading as it appears to imply that compensation can be undertaken as an alternative to mitigation.

Site Selection Strategy and Guiding Principles

We note the first principle and advise that restoration schemes should provide ambitious biodiversity goals which complement their surroundings. If well designed they can also provide multifunctional benefits such as the provision of Green Infrastructure for wildlife and people, encompassing wildlife corridors, recreational opportunities, climate change adaptations, with health and wellbeing benefits for example.

We would welcome the opportunity to provide early advice on restoration proposals as a number of allocations have significant implications for biodiversity. Again the biodiversity net gain principles (detailed above) should be applied and restoration plans should include priority habitats with appropriate funding schemes attached to ensure delivery. The impact on biodiversity needs to be assessed at a strategic level with clear avoidance of key habitats. The plan includes potential impacts to heathland sites and ancient woodland and with further impacts to areas currently suitable for heathland restoration.

We strongly advise that impacts to the natural environment should be a principle in its own right. We therefore advise that a separate biodiversity principle is included to encompass impacts on designated sites, priority habitats and local wildlife sites for example. This should again make clear links to natural capital for example the water environment, soils conservation for example with green infrastructure and net gain. We advise that a review of impacts to these assets at a strategic level must include avoidance of key wildlife habitats clearly following the mitigation hierarchy.

Therefore it is not appropriate to put the natural environment and built environment within the same principle.

Site allocations

Chantry Lane

Of key concern to Natural England is that the location of this site adjacent to Chantry Mill Site of Special Scientific Interest (SSSI). Any assessment of this site would need to include the location of interest features and how these would be retained. The allocation states that the Geological SSSI status would be retained although it is not clear how. Furthermore:

Natural England would require access to the interest features for study and scientific research.

Any change in access to the site could destroy interest features and this needs to be clarified.

The site is also within a nationally designated landscape. We refer you to the provisions of the NPPF to this end:

172. *“Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and AONBS, **which have the highest status of protection in relation to these issues.** The conservation of wildlife and cultural heritage are important considerations in these areas and should be given great weight in National Parks and the Broads. **The scale and extent of development within these areas should be limited.** Planning permission should be refused for major development other than in exceptional*

circumstances, and where it can be demonstrated that the development is in the public interest..." Major Developments Test as 2012 NPPF.

We advise that a full LVIA would be required for any development of this site to appropriately assess the landscape and visual impacts of the proposal and the impacts on the Special Qualities of the South Downs National Park.

Bunton Manor Farm

The site is adjacent to the South Downs National Park. Again we refer you to the NPPF regarding this nationally protected landscape.

Dunton Moor-Lavington Common SSSI

This site is within the National Park; therefore previous comments apply. Of key concern is the location of this allocation, adjacent to Lavington Common SSSI. Any working of this site has the potential to deleteriously affect the interest features of the neighbouring SSSI via impacts to the existing hydrological regime and dust emissions for example.

Of further concern is the fact that the site appears to include priority habitats (deciduous woodland) which should be avoided. Restoration schemes should enhance the adjacent SSSI and provide a net gain in biodiversity.

As above development here will need to consider the potential impact on barbastelle and Bechsteins bats.

Coopers Moor –Priority habitat

Of further concern is the fact that the site includes priority habitats (deciduous woodland) which should be avoided. Restoration schemes should enhance the nearby SSSI and provide a net gain in biodiversity.

As above development here will need to consider the potential impact on barbastelle and Bechsteins bats.

Severals East and West

This allocation contains ancient woodland. Ancient woodland is an irreplaceable habitat and we strongly advise that impacts are avoided. We refer you to the NPPF which has recently been revised and includes robust policy protection for this important habitat as follows:

175 c) "development *resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees)* **should be refused unless there are wholly exceptional reasons** (footnote 58) **and a suitable compensation strategy exists**". Footnote 58 "For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills) where the public benefit would clearly outweigh the loss or deterioration of habitat"

We note that restoration includes heathland which would complement the surrounding habitats and broadleaf woodland, however we are very concerned regarding the loss/deterioration of irreplaceable habitats within this allocation which should be avoided.

Furthermore impacts to the flightlines of barbastelle and Bechsteins bats must be fully assessed with respect to impacts on these species.

If you have any queries relating to the advice in this letter please contact me on Rebecca.Pearson@naturalengland.org.uk or 07810694335.

Should the proposal change, please consult us again.

Yours sincerely

[REDACTED]
[REDACTED] t

WEST SUSSEX SOFT SAND REVIEW: ISSUES AND OPTIONS

Please complete and return this form to Planning Services, West Sussex County Council, County Hall, Chichester, PO19 1RH by **18 March 2019**. Visit our website for further information: www.westsussex.gov.uk/mwdf.

Data Protection/Privacy: West Sussex County Council is registered as Data Controller(Reg. No. Z6413427). For further details and information about our Data Controller, please see www.westsussex.gov.uk/privacy-policy.

[Redacted]

A1. Personal Details

[Redacted] [Redacted] [Redacted]

[Redacted] [Redacted]

Organisation of [Redacted] [Redacted]

[Redacted]

[Redacted]

[Redacted] [Redacted]

[Redacted] [Redacted]

[Redacted] [Redacted]

[Redacted] should be contacted regarding this response

[Redacted] [Redacted]

[Redacted] [Redacted]

[Redacted] [Redacted]

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Please tick all categories below that most adequately describe you.

- | | | |
|---|--|--|
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| <input type="checkbox"/> Local Business | <input type="checkbox"/> District/Borough Councillor | <input type="checkbox"/> Government Organisation |
| <input type="checkbox"/> Minerals or Waste Industry | <input type="checkbox"/> County Councillor | <input type="checkbox"/> Non-Government Organisation |
| <input type="checkbox"/> Landowner | <input type="checkbox"/> Local Authority | <input type="checkbox"/> Other (please specify) |

If you submit a consultation response, your contact details will be used to automatically notify you of updates with regards to the soft sand review and minerals and waste planning policy. Please tick the appropriate box if you **DO NOT** wish to be notified of the following.

- Progress and consultation on the Soft Sand Review
- Any further updates about Strategic Waste or Minerals Planning in West Sussex

STEDHAM WITH IPING PARISH COUNCIL

in association with **Minsted Residents Group**

18 Mar 2019

Submission for West Sussex Soft Sand Review – Issues & Options 2019

PART B: ISSUE 1

Question 1A: Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

- (i) The demand for soft sand, and therefore justification for new sites is over-estimated based on evidence in recent documents applicable to this Single-Issue Review of Soft Sand. The 2018 LAA and related estimates of demand do not adequately take account of the significant changes within the building industry with the increase in off-site production. This is evident in the need to address the increased resilience of our built environment and green infrastructure solutions. The Governments Clean Growth Challenge, as part of the industrial strategy to put the UK at the forefront of the global low carbon economy, places particular emphasis on the importance of transforming construction processes. The stated aim is to enable the building industry to build 50% faster, 35% cheaper and with 50% less carbon emissions over the lifetime of buildings. In consequence, much of the building industry focus is now concerned with the development of off-site solutions, reducing the need for mortar and therefore soft sand.

The formation of full-service modular building companies, such as Modern Boutique Ltd based in Newhaven, and their recent delivery of affordable homes in Peacehaven is a clear example of this shift in housing delivery. This is not reflected in the LAA and must be adjusted to better relate to this significant change to building delivery.

The WSCC/SDNPA should review the LAA and estimates of demand so that they are more closely aligned to the trends in building. Furthermore, for reasons of sustainability there must be much greater focus on the careful use of finite mineral resources and therefore a more sustainable approach to the working of soft sand. The soft sand study by WSCC/SDNPA must more closely align with available reserves within the existing soft sand sites and production rates which bring completion and restoration within shorter timescales.

At the present time it is apparent that much information that underpins assessments over past plan periods is inaccurate and not supported by volumetric survey evidence or detailed production rates. To ensure the

accuracy of production rates the plan should perhaps place less reliance on information provided by individual quarry owners but should be supported by information supplied by HMRC on the mineral royalties received for each of the relevant years and sites.

Current reserves in the plan area of 2,745,000 tonnes (production figures, 2018 LAA) would appear a significant under-estimate as table two of the 2018 WSCC monitoring report refers to 'Reserve increase due to new information regarding two sites' and 'reserves of 3,458,000 tonnes of soft sand'. Any need for sand needs to relate more accurately to the available reserves. The demand for soft sand, and therefore justification for new sites is over estimated, based on evidence in recent documents applicable to this Single-Issue Review of Soft Sand.

- (ii) In this regard and with reference to Minsted sandpit it is questioned how a fully worked out quarry in 2004 has continued producing sand for 10 plus years undermining forecasts and indicating that quarry owners are not being open and honest with the information on the quantity of viable resources. To highlight this point, it is apparent for the purposes of the JMLP it was suggested that the reserves at Minsted were in the region of 480,000 tonnes, but in October 2018 this figure had, without explanation or recent working at the sandpit, changed to 170,000 tonnes. The reasons for this need to be fully understood for the contribution of this and other sandpits to be given credibility.
- (iii) Furthermore, it is unclear why the 2018 LAA: Table 6: Permitted Sand and Gravel Quarries in West Sussex (2018), excludes mention of Minsted when it is a site with Planning Permission and apparent known reserves. Whilst it is the case that the site is subject to a ROMP that has not been fully submitted, the applicant has indicated it his intention to submit it and the SDNPA have agreed to extend the timescale for its submission thereby keeping the consent alive. The quantity of available reserves needs to include Minsted in this circumstance.

The WSCC/SDNPA must review the information that underpins assessments over past plan periods and be in a position to fully confirm or clarify the extent of reserves. The British Geographical Survey UK Minerals Yearbook 2015 shows steadily declining UK production of sand and gravel (aggregates) including building (soft) sand in the period 1990-2014 with output becoming more constant at a lower level of approximately half the tonnage of that in 1990 for the years 2010-2014. In every year 2010-2014 the domestic consumption was less than production with the balance being exported. This includes land won and marine dredged products. In West Sussex 275,000 tonnes of sand and gravel was exported in 2014 (of which 96% is soft sand).

- (iv) This, possibly, indicates that the need for soft sand is reducing within the plan area and the large surplus produced is simply being exported to other parts of the South East. The reasons for this trend need to be understood. Is it the case that other Mineral Planning authorities are not providing adequate reserves within their plan area to meet their needs, or that the surplus from WSCC/SDNP plan area is being utilized for other (non-building) purposes elsewhere? In the case of Minsted we are conscious that much of the sand is used for recreational and leisure purposes. We suggest that this is not a necessary or sustainable use of a finite resource from a nationally important landscape.
- (v) The NPPF at para 207 says “*Minerals planning authorities should plan for a steady and adequate supply of aggregates by:*
a) preparing an annual Local Aggregate Assessment, either individually or jointly, to forecast future demand, based on a rolling average of 10 years’ sales data and other relevant local information, and an assessment of all supply options (including marine dredged, secondary and recycled sources);
b) participating in the operation of an Aggregate Working Party and taking the advice of that party into account when preparing their Local Aggregate Assessment”.

However, in forecasting future sales, the NPPF prescribed 10-year rolling average guideline has been replaced by a simple average of the last ten-year sales which does not identify a trend and does not produce the same results.

Using a 10-year rolling (or moving) average calculation shows a long-term trend of falling sales. However, the simple average of the last 10 years sales of 313,210 shows the same annual sales for each year to the end of the plan period which, by the year 2033, will then be based on the same static data that is 15 to 25 years old.

Based on a clear trend of falling sales from at least 2000, in this scenario the simple average overestimates the need for soft sand in the Plan period by a considerable margin. The Engagement Outcome Report for Background Paper 2 in the WSLMP 2014 addresses this point as follows:

The South East England Aggregate Working Party (SEEAWP) has considered Local Aggregate Assessments produced by 20 Mineral Planning Authorities in the South East of England, including West Sussex County Council. Without exception, all of these Authorities have considered the meaning of the term ‘rolling average of 10 years sales data’ contained within NPPF para 145, concluding that it refers to the simple average of the sales that occurred during the most recent 10 year period. This conclusion has been supported by SEEAWP.

And the Soft Sand Review at 2.3, also defends its methods of forecasting through having “*AWP (Aggregates Working Party) ratification*” and “*no soundness or legal compliance issues raised through the examination of the JMLP with regards to the forecast for aggregates*”.

The issue here is that it is not acceptable, without reasons, just to claim there was general agreement to replace the 10-year rolling average with a simple 10 year average when the NPPF, up to its latest revision, states otherwise.

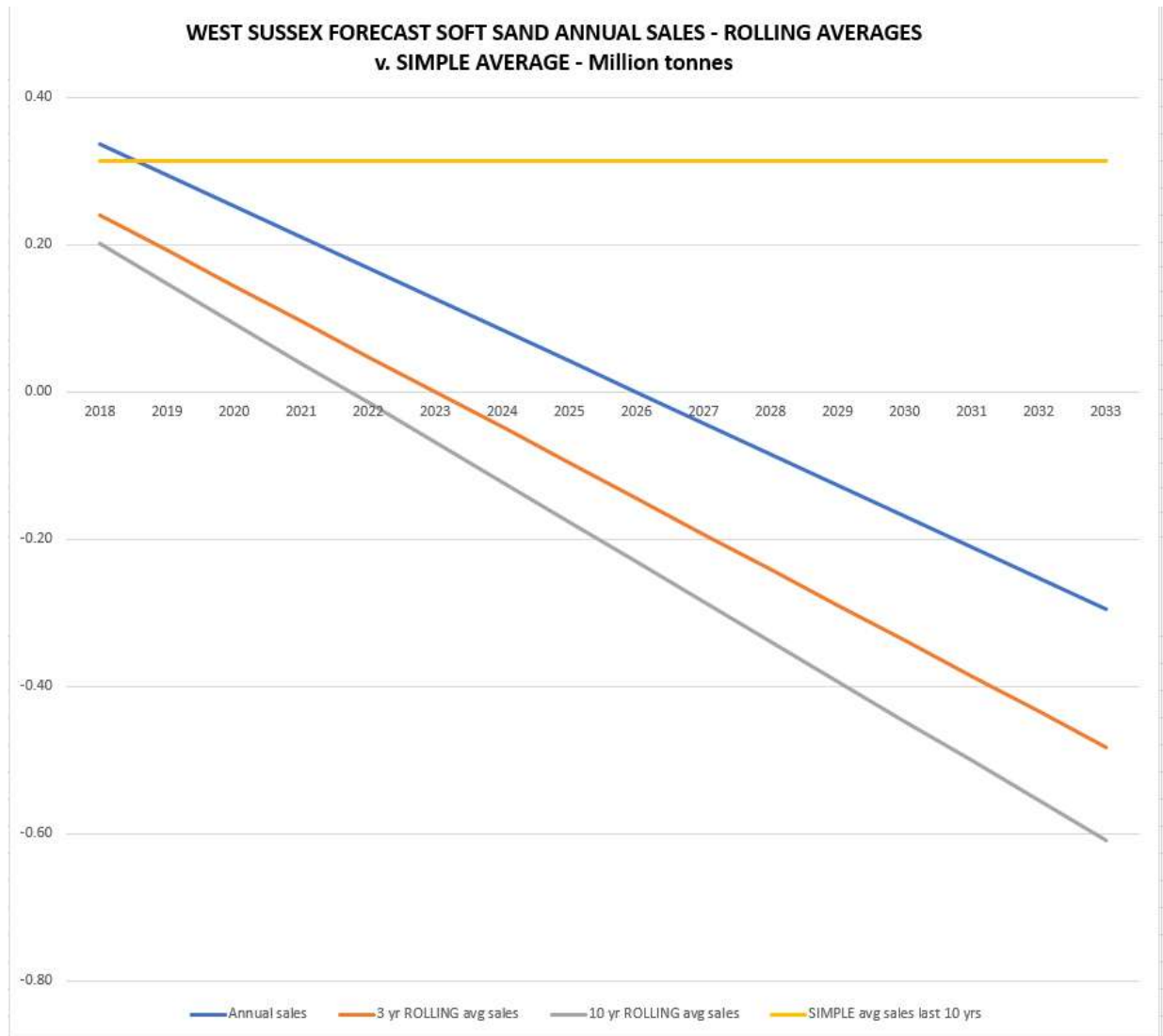
This is especially the case when, in the graph below, the yellow line showing the simple average indicates four times as much sand is required in the Plan period than either the red or blue rolling average forecasts.

Therefore, it needs to be explained why the AWP thought it appropriate for LAAs to discard the NPPF basis for forecasting, which demonstrates falling sand sales, in favour of an incorrect statistical method using the same static annual sales for the next 15 years which overestimates the sand requirements.

Also, we see no examination of building trends or evidence that the contribution of secondary and recycled products is being maximized.

Furthermore, it is not clear whether any environmental criteria have been applied within the work of the AWP to take account of the implications of requiring mineral supplies from areas of nationally important landscapes.

National planning policy confirms that sub-regional apportionments are not inflexible, and the opportunity should be provided, through the Local Development Framework process, to test practicality and environmental acceptability of the apportionment.



Question 1B: Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

Yes.

- (i) SDNPA need to resolve the silica sand issue so that all parties are clear whether it applies to any part of the Folkestone formation and specifically the Minsted west site.
- (ii) WSCC/SDNPA are net exporters of sand with 275,600 tonnes of sand and gravel being exported from West Sussex in 2014 - latest year figures provided – which include soft sand. The need is for adjoining authorities to increase supply which will also be more sustainable with soft sand being excavated closer to Surrey and London. The removal of soft sand from the Folkstone Formation in Surrey would utilise the thicker bands of sand with less impact in tracts of countryside that are not within National Parks.

- (iii) Whilst the need for soft sand is equated with construction needs, it is apparent that in reality this is not the case with much sand being used for 'non-mortar' purposes and particularly recreational and leisure purposes. WSCC/SDNPA should be requested to undertake a closer examination of end uses to identify the real and sustainable need for soft sand, particularly with changes in house building and the construction industry leading to different building techniques being used with more off-site fabrication anticipated and less 'wet' construction.
- (iv) Another increasingly dominant factor in estimating demand for building materials, including sand for mortar and cement, is Greenhouse Gas Emissions. These are increasingly being factored into national policies and in February 2019 the Committee for Climate Change published a report on future housing that referred to the need, ideally as soon as 2025, to: *Improve focus on reducing the whole-life carbon impact of new homes, including embodied and sequestered carbon*. The report advocates using wood in construction to displace high-carbon materials such as cement (comprising large volumes of sand) and steel. On this basis there is already pressure to reduce consumption of sand, which is a non-renewable resource. Marine dredged sand is more plentiful.
- (v) The methodology used for developing a demand scenario may therefore be overestimating significantly the future sand requirement. When preparing the Joint Minerals Local Plan (JMLP) 2018, the Mineral Planning Authority (MPA) approach was to plan for the highest demand scenario, to ensure that sufficient provision is made for a steady and adequate supply of soft sand, in other words predict and provide. Predict and provide is not a sustainable approach when applied to finite resources, and alternative solutions must be sought. The JMLP does not adequately account for the increasing emphasis on using recycled materials as well as reducing demand by substituting other construction methods and materials. The SSR should do so.
- (vi) WSCC/SDNPA as the MPA have ruled out hydraulic fracturing operations in the SDNP for shale gas and oil following concerted pressure and protests by the environmental lobby, concerned about climate change, and residents in areas that would be affected. The MPA should take note that when applying the same criteria of nuisance and damage, the impacts of sand extraction are significantly more harmful to the landscape, local communities and amenities people cherish in the National Park. Sand extraction creates much more diesel and dust pollution, and noise from onsite earthmoving, processing machinery and lorry traffic. Fracking activity is below ground, with relatively small discrete sites for boreholes and wellheads that are more easily screened.
- (vii) Fracking, unlike sand extraction, does not involve the removal and transport from much larger sites of millions of tonnes of overburden and sand creating deep water filled pits in the ground. High value gas and oil products from

fracking are produced in much smaller volumes than bulky lower value sand products, and therefore require fewer HGV movements to and from sites. Fracking sites do not destroy landscapes permanently as no significant amount of material is removed from the landscape.

Question 1C: Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view?

Yes.

- (i) The exceptional circumstance test is not proven for SDNPA as a location for new reserves, and therefore no further sand is needed or should be planned for. Whilst the Managed Aggregate Supply System (MASS) has been the mechanism to ensure there has been an adequate supply of aggregates (sand, gravel and crushed rock) in England for over 35 years it is questioned whether this is still appropriate and sufficiently challenging in the south-east with the designation of The South Downs National Park. It does not appear that the changes in the future delivery of buildings has been taken into account or that the importance of recycling has been recognised with more challenging targets. The assessment of the balance between demand and supply, economic and environmental opportunities and constraints need to be weighted to reflect the special circumstances of The South Downs National Park.
- (ii) The Local Aggregates Assessment (LAA) 2018 shows West Sussex as a net exporter of land won sand and gravel. If such a surplus exists then estimates of local requirements to 2033 are excessive.
- (iii) We suggest that there is not a short fall of soft sand and that the 'predict and provide' approach is not consistent with the sustainable use of finite supply of minerals, in this case soft sand. The average value of the last 10-years' sales for soft sand is stated as 313,210 tonnes (2007 – 2016) (based on January 2017 data), In 2017, the total permitted reserve of soft sand was 3,354,800 tonnes which provides a landbank of 10.7 years.
- (iv) The Bognor Common sand quarry at Fittleworth and possibly other mineral sites have shown that 'reject' material can be a substitute for soft sand in leisure and recreation uses reducing the need for soft sand.
- (v) SDNPA-produced sand is being used to meet requirements from outside both the National Park and the plan area. The figures published in the Joint Minerals Local Plan show that in 2014 exports from West Sussex of soft sand, sharp sand and gravel amounted to 626,000 tonnes which exceeded by 473,000 tonnes the reported imports of 54,000 tonnes and West Sussex's own use of 99,000 tonnes. Some 96% of the total sand and gravel figures represent soft sand. The SSR needs to consider very

carefully how far these exports are necessary and why this material is not prioritised locally to reduce the claimed shortfall.

- (vi) Soft sand is not always used in what might be considered high priority applications such as for house building, and therefore any “exceptional circumstance” that might otherwise be claimed under NPPF 172 in the course of planning considerations should not apply where this is the case. This is the case at Minsted Sandpit where historically the sand has been used to service the tiling industry in Berkshire and Kent and more recently for recreational uses such as golf courses, equestrian uses, animal bedding, football pitches and polo pitches. There needs to be clarity on the need and sustainability of finite reserves of soft sand within the National Park for uses in locations beyond the plan area where the extraction of more locally available sand reserves should be achieved and for low level ‘non-essential’ uses to be substituted with alternative materials.
- (vii) Reductions in soft sand production will have a significant environmental benefit, bringing about the restoration of the many dormant and largely worked out sites across the plan area and into East Sussex (Novington). It would appear that only through the reduction of demand will it be necessary and viable to focus mineral extraction on the existing sites bringing about their timely restoration. Simply providing more sites will exacerbate the current unacceptable situation. If the need for sites is identified these must not come on stream until all the current sites are restored.

PART C: ISSUE 2

Question 2A: 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.

- (i) The 2018 LAA makes reference in para 2.1.32 to the South Downs Soft Sand Study (2012) which states that the Crown Estate ‘believe that there is potential for marine sources to provide viable ‘soft’ sand as an alternative to land-based quarrying’. There are sources of marine-won aggregate being used, as a replacement, or through blending, to create mortar. In 2014, in England and Wales, 1.05mt of marine-won aggregate was used in mortar. Of this, 72,000 tonnes was sold in the South East. The SEEAWP South-East England Aggregates Monitoring Report 2017 sets out that some 50,710 tonnes of marine soft sand was sold from South East wharves (table 8). Evidence collated via the annual Aggregate Monitoring Surveys shows that during the three-year period 2015 – 2017, an annual

average of around 51,118 tonnes of aggregate sold from West Sussex wharves was sold as soft sand. The landing of additional quantities of soft sand would not give rise to capacity issues as there is mention in para 2.2.17 of the 2018 LAA of a theoretical minimum surplus capacity of 762,553 tonnes at wharves. The landing of minerals close to the areas of population and development would reduce transport impacts. There is a clear and viable alternative to land won reserves with potentially less environmental impact, and therefore higher sustainability credentials.

Furthermore, it is not considered that the full potential of recycled products has been realised. The 2018 LAA shows that the use of recycled material is declining. No explanation is given as to the underlying reasons, but it would not be unreasonable to suggest that the over provision of primary minerals is directly correlated to this situation. Companies such as GlassTech Ltd have an open loop recycling process in which waste materials that cannot be recycled back into their original industry are treated and utilised as a resource for other industries e.g. insulation industry for loft insulation and sand replacement for laying block pavers & slabs, backfilling ground works, pipe bedding and ménages. It is therefore appropriate to reduce reliance on primary minerals, including soft sand to ensure recycling is increased. Again the 2018 LAA shows that in 2018 the 18 sites within the plan area have the ability to provide a total capacity of 848,000tpa for recycled aggregate production, which is more than double current levels.

The predict and provide approach does not encourage the increase in recycling. It is not clear that all the potential benefits from the encouragement for recycling aggregates, including glass as a replacement for sand, have been thoroughly explored to the extent that is reasonable when considering a 'finite' resource such as soft sand. Further work is required to show that the strategy, and the calculation of the shortfall are sustainable.

- (ii) The legacy of unrestored sandpits within the National Park at Minsted and Novington (East Sussex) and elsewhere where only small quantities (if any) reserves are deemed to remain must be addressed. By identifying new sites, the WSCC/SDNPA are simply exacerbating this situation and prolonging the timescale when restoration will eventually take place, thereby unnecessarily creating eyesores within the nationally protected landscape. They must develop conditions where existing sites are fully worked and restored at the earliest opportunity in accordance with **Policy M24** of the adopted joint Mineral Local Plan and para 204 (h) of the NPPF. This avoids unnecessarily safeguarding mineral sites for long period of time and the sterilisation of land.
- (iii) Appendix B of the WSCC/SDNPA 2018 Monitoring Plan lists the operating sandpits, to which Minsted needs to be added as it still has the potential

to operate. In the list of sandpits below the current situation at all the sites is highlighted including reference in some cases to lapsed consents that would allow further working. The lists indicate the very disturbing absence of progressive restoration and the potential length of time when the sites could be left unrestored if the Soft Sand Study does not adopt a proactive approach to their restoration and resists the release of new soft sand reserves at new sites. The following are the list of soft sand sites:-

- 1. Chantry Lane Quarry, Sullington, Dudman Aggregates Ltd.** Inactive -no restoration – still operating under planning permission SG/7/93 and continuing to extract, albeit slowly. Restoration has not begun.
- 2. Hampers Lane Sandpit, Washington Quarry, Sullington Britannia Crest Recycling Ltd.** Permission lapsed (ref: WSCC/104/13/SR) but could be reopened with suitable consent. Site operating under planning permission WSCC/009/18/SR allowing extraction to 31 December 2019, and infill/restoration to 1 May 2020. Restoration 70% complete.
- 3. Rock Common Sandpit, Washington, Pulborough.** Dudman Aggregates Ltd. active. No restoration.
- 4. Sandgate Park Quarry, Water Lane, Sullington, Storrington CEMEX UK Operations** active with restoration to landscaped lake for fishing and nature conservation anticipated in 2042. No restoration to date.
- 5. West Heath Quarry, West Harting, Petersfield CEMEX UK Operations** Extension expires – 2025. Older part of the site expires in 2042-no restoration. –still operating under planning permissions SDNP/16/00525/CONDC and SDNP/16/00492/ROMP. Restoration has begun with approximately 30% of the site restored.
- 6. Heath End Quarry, Duncton, Petworth Dudman Aggregates Ltd.** Permission granted on appeal in September 2016 with restoration in 2021-operating under planning permission APP/Y9507/C/15/3133267. Restoration has begun with approximately 40% of the site restored.
- 7. Minsted Sandpit, Minsted Common, Midhurst Dudman Aggregates Ltd.** Site in suspension pending ROMP review. Restoration anticipated in 2041(15% restoration only with site currently under suspension and no further restoration imminent.
- 8. Pendean Quarry, Oaklands Lane, Pendean, Midhurst Inert Recycling UK Ltd.** Site is operating under planning permissions WSCC/029/10/WL, SDNP/16/00631/CW; SDNP/16/01136/NMA and SDNP/17/01816/FUL. Whole site now falls under the importation of inert material for restoration. Approximately 30% of the site is completed.
- 9. Coates Sandpit near Petworth** dormant with some remaining reserves. Site is currently dormant and limited restoration has taken place.

The situation is little better at the only operating site within East Sussex, also within the National Park:

- 10. Novington, Near Plumpton East Sussex.** Dudman Aggregates Ltd. No restoration. – site is operating under planning permissions LW/386/CM

and SDNP/13/01933/ROMP. Approximately 30% of the site has been restored.

The existence of so many unrestored sites reinforces the point in 2A(ii) above.

- (iii) Given the range of supply options from outside the National Park and the number of existing dormant/suspended sites within the National Park, including Minsted, any potential reserves that are claimed in these should be worked first and used as necessary in site restoration in accordance with JMLP Policy M24, Restoration and Aftercare.
- (iv) There is no reliable detailed evidence from the operators of production figures for existing sites to ensure that the remaining sandbank calculation is accurate. All such information should be revealed and audited, as it is apparent that the life of some sites is much greater than previously indicated. It is unacceptable to continue to allow the permanent destruction of protected landscapes within a National Park on the basis of inaccurate data.
- (v) Minsted sandpit is a case in point where in 1998 the life of the sandpit was stated as being 5-7 years (2003-5), yet a ROMP application was submitted in December 2013 on the basis that further reserves remain. It is therefore the case that mineral sites within the National Park are being worked beyond their predicted life span, which is indicative of either a greater volume of material or a slower rate of demand. Either way it calls into question the existence of any shortfall. Also given the number of inactive or suspended sites in the National park, where has the supply been coming from, particularly as there is an export surplus from West Sussex?
- (vi) Crucially this raises grave doubts about the reality of the estimated shortfall to 2033, and cannot justify the destruction of the landscape and public amenities with additional sites or site extensions in the National Park.
- (vii) By identifying or giving encouragement to new sites, WSCC/SDNPA are exacerbating this situation by delaying the restoration of worked out sites, thereby maintaining existing eyesores and inflicting additional damage to a nationally protected landscape and harm to the communities affected. In the case of Minsted which is proposed to be extended, the existing site is worked out and in suspension following a long overdue and stalled ROMP process. Given all the evidence, or absence of it, relating to the Minsted ROMP, which has effectively stalled, a prohibition order is overdue by at least two years. NPPF Para 204 (h) covers the requirement to ensure that worked land is reclaimed/restored at the earliest opportunity.

Question 2B: 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.

- (i) Option B conflicts in principle with the 2019 NPPF Facilitating the sustainable use of Minerals: in para 205 which states that as far as is practical MPAs should maintain landbanks outside national parks and conservation areas.
- (ii) We would therefore rule out Option B. It is not considered that there is a proven need for soft sand sites within the National Park and that any need should be met from reserves outside the park, and indeed other counties, which is more sustainable, providing reserves nearer to the areas of demand. Close examination of the uses of soft sand needs to be undertaken as much of the sand from Minsted was used for lesser recreational and ancillary purposes, rather than higher priority-built development, where other sources of primary and secondary materials can be substituted.
- (iii) Marine won sand is an attractive option if the sand can be processed for use in mortar and concrete as an alternative to land won soft sand, especially given the wharf capacity and available reserves. As explained in Option D of Appendix A of the SSR Report. Demand and supply 3.0.2 Historically soft sand demand in West Sussex have largely been met from land-won sources, though data suggests that marine won sand could possibly provide a source of supply in future.

Question 2C: Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

- (i) Option E but excluding Option B, therefore not including sites within the SDNP.
- (ii) We are specifically concerned about and object to the inclusion of Minsted West in this OR any future plans. Minsted West would be effectively an extension site and therefore prolong all the outstanding unresolved issues at Minsted Sandpit. We would also strongly object to the continued harm and impact on the local environment and amenities if the existing Minsted Sandpit site were to remain operational as a depot or processing, concrete batching or distribution site for sand and aggregates imported from elsewhere, especially including the sites at Severals West and Severals East.

Question 3: Do you have any comments on the draft Sustainability Appraisal of the Options?

Yes.

- (i) The Sustainability Appraisal, including Strategic Environmental Assessment at para 5.23 did not take into account the potential for marine won soft sands and wrongly concludes that the then one policy option would have significant negative effects for SA objectives 10 (air quality) and 13 (transport), due to the increased dependence on imports to meet requirements which cannot be met from indigenous supplies, which is likely to result in increases in lorry traffic transporting soft sand into West Sussex by road. On the contrary, the option of marine won reserves would reduce traffic and air quality impacts through the delivery of soft sand closer to the coastal population centres avoiding trips through the National Park and disturbance through mineral working in areas of high landscape importance.

The SA recognised the importance of a hierarchical approach to soft sand provision, by clearly prioritising supply from existing permitted reserves first and not allocating extensions or additional sites in the SDNP. In this context if there is a need for soft sand within the plan area, additional allocations/areas of search should be beyond the SDNP.

- (ii) The draft Strategic Environmental Assessment recognises that option B in particular, by identifying potential sites within the National Park, would result in a number of negative impacts including on landscape and residential amenity. Minsted West is a prime example. The site is easily visible from the South Downs Way, directly affecting the setting and special characteristics of the National Park that are intended to be protected for enjoyment as a public amenity. The area, including Stedham and Iping Commons with sites of SSSI, is popular for recreation by walkers, cyclists and equestrians and a Public Right of Way (PROW) to the south of Minsted Sandpit is at risk of closure with a long diversion from any proposed site extension.
- (iii) Eight new homes converted during the last 10 years from farm buildings either side of Minsted Road are within 180-200 metres of the SE boundary of the proposed Minsted West site. There would be a highly detrimental effect on these homes through noise, dust and restriction/loss of views across the current tranquil landscape of fields and woodland, including views to the Downs. Residents would also be subject to the hazards of additional HGV traffic at the upper end of Minsted Road, which is single track. The landowner All Souls College, Oxford which has benefited from the freehold sale of these housing plots also owns the land that includes the Minsted West site. In addition, there are another 12 dwellings in Minsted at a similar distance from the site

and to properties at Quags Corner, and in the Severals towards Bepton less than 1 mile away.

- (iv) If Minsted West were to be approved, it would result in the loss of 10Ha (24.7 Acres) of productive agricultural land currently in full use. Farming is essential to maintaining the landscape as well as supporting a sustainable food supply chain and local employment. NPPF refers to maintaining “the best and most versatile agricultural land: Land in Grades 1, 2 and 3a of the Agricultural Land Classification.” According to the Minsted West, Severals 2014 Minerals Sites Study for SDNPA, site criteria shows soil quality classed as Grade 1 for Minsted West. Grade 1 is excellent quality agricultural land and cannot be dismissed as being of little value when it is in full and productive agricultural use as an integral part of a large dairy farm.

PART D: ISSUE 3

Question 4: Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

- (i) We note the element of the assessment that considers the cumulative impact of proposals. The NPPF states that policies and proposals should take account of existing activity and impacts, the duration and nature of proposals for new or further workings, and the extent of impacts that a particular site, locality, community, environment or wider areas of mineral working can reasonably be expected to tolerate over a particular or proposed period. In this context we anticipate that considerable weight will be placed on the existing situation with the Minsted sandpit and the inability of the SDNPA to secure its restoration in a timely manner, the dereliction and confirmed harm that this has caused to the amenity of the area. Because of the failure to address the multiple breaches of planning control at the existing Minsted sandpit it cannot be considered as immediately available.
- (ii) We would ask that **the full information** on minerals type/quantity; total reserve (tonnes); marketable reserve (tonnes); estimated annual yield (tonnes); suggested working arrangements; suggested after-use and landownership/Developer/Operator be made available so that this can be independently assessed.
- (iii) We note that additional information about all sites is required to determine whether a site can be delivered during the plan period and that sites which cannot be so demonstrated will be excluded. Having regard to the 14 years of delay in the existing Minsted sites restoration,

and no prospect of a change in this position, it is considered that on the basis of cumulative impact alone it would not be a 'sound' approach to progress the Minsted West site and accordingly it must be excluded from further consideration.

- (iv) The red/amber/green system appears subjective and inconsistent and does not seem to reflect the ultimate decision as to whether a site is selected or not. Nor is it clear why certain sites have been short-listed and others not where they appear to have similar attributes.

Question 5: Do you have any comments on the nine shortlisted sites identified in the Issues and Options Consultation Document?

Yes.

- (i) We strongly object to the inclusion of Minsted West, which is our greatest concern. Severals West and Severals East are close to Minsted and we also object to the inclusion of both of these sites. The overriding objections we have to all three sites if shortlisted are the same, particularly regarding the unproven need for new or extended sand extraction sites in the National Park and the negative impacts on the landscape, surrounding communities and amenities for visitors in the Midhurst area.
- (ii) Our objection to Minsted West is reinforced in the light of our long experience with Minsted Sandpit, and the proposal to develop Minsted West as an extension to it. We objected to the Proposed Modifications to the JMLP in 2018 requested by the Planning Inspector. These included the deletion of paragraphs 6.2.20 to 6.2.23 to be replaced with paragraph MM24: Paras 6.2.16 to 6.2.20. Paragraph 6.2.23 as deleted at the request of the Inspector stated that: *"Proposals to extend existing sites will only be supported where the existing site does not have any outstanding or unresolved issues in relation to planning controls aimed at ensuring that the site operates without harm. For example, if a site that should have been partly restored in accordance with a phased restoration scheme were to be extended, this would exacerbate the ongoing impact on the landscape."*
- (iii) Minsted sandpit is such a site whose history of unresolved issues dates back to 2005. Given its stalled ROMP Minsted is currently in suspension and should, as a matter of urgency and in the public interest, be subject to Prohibition Order as intended by the legislation and restored in accordance with an appropriate scheme of landscaping. We remain dissatisfied with the failure and/or reluctance of the MPA to enforce the 24 breaches that have accumulated and remain outstanding at Minsted prior to its suspension in 2014. These breaches are a matter of public

record and too detailed to list here. We also question why the MPA has repeatedly claimed legal privilege in declining to provide reasons for the delay in imposing a Prohibition Order on the site when it would appear to have the necessary reasons and powers.

- (iv) Our concerns about Minsted Sandpit are further heightened because the same operator that has demonstrated such a cavalier attitude to planning conditions in the past also proposes to operate Minsted West should it be permitted in the future. Matters could be made worse because the operator appears to be supported by the landowner, All Souls College, Oxford, who is apparently unconcerned about the effect their chosen operator has already had on the landscape, and is willing, by promoting the Minsted West site with this operator, to inflict further damage on the National Park that cannot ever be entirely restored.
- (v) We must repeat again that it is not just unsound, but irresponsible to allow operational history of this nature to remain uncured and/or perpetuated through a Planning Inspector's recommended Modification to the Plan that allows operators and landowners to escape their legal obligations. Deletion of this very significant paragraph, 6.2.23 as above, removed a vital safeguard to ensuring the National Park's objectives can be maintained. Doing so undermined the key landscape objective to provide for the progressive restoration of worked out mineral sites, such as Minsted, in an expedient manner.
- (vi) The SDNPA has confirmed that Minsted Sandpit is subject to multiple breaches of planning control since 2005, and has been overworked beyond the permitted boundaries, depth and angle of working. In September 2012 the SDNPA confirmed to the site operator that they would take enforcement action within two months 'to ensure that operations on site accord with the planning permission' and to 'avoid further harm to the local environment'. At that time the impacts on amenity were considered to fundamentally conflict with the National Park purposes and the approved planning policy.
- (vii) We would also like to point out that Minsted Sandpit was all but fully restored in 2004 by the then operator Hansons, when landowner All Souls College ordered restoration to cease and leased the sandpit to another company. This new operator excavated out and undid all Hanson's restoration and then "through over-extraction beyond permitted limits" left Minsted Sandpit in its present state of being incapable of meeting the Restoration Plan set out in the planning consent. The absence of any action undermines the purpose of the Joint Mineral Local Plan and the Planning Authority as an effective enforcer of planning control.
- (viii) In this case the SDNPA has failed to fulfill its mandate to enforce planning requirements despite all representations made to it, including many

times by Stedham with Iping Parish Council and the Minsted Residents Group. And now, the Government's Planning Inspector requires this single-issue soft sand review to incorporate fundamental changes to the rules, generously relaxing them, that affect existing sites such as Minsted. This appears, whether intentionally or not, designed to favour the commercial interests that have been lobbying for a site extension to Minsted West, and which if they were to prevail would be harmful to all the other interests that the National Park was established to protect.

- (ix) It is clear that the extension to Minsted West is being promoted by the land owner and operator not only to exploit any unconfirmed reserves claimed for Minsted West, but to avoid the cost of compliance with the restoration plan, overdue but not yet enforced, for the overworked Minsted Sandpit. Additional mineral working by extending Minsted would prolong and increase the negative impacts on the amenities of residents, increased significantly in number since 2008 with the additional eight households in the converted farm buildings, plus users of the Public Right of Way that would be lost, and others seeking to enjoy the tranquil countryside in the area.
- (x) More generally, we strongly disagree with spurious claims made in the local press by the landowner (The Cowdray Estate) of potential new sand sites, particularly Severals East and Severals West, that recreational areas could be enhanced in the long term through the restoration of new mineral sites.

This is identified as a "minor positive effect" in planning terms. However, the damage and disruption from new sites lasts 20, 30 or more years so cannot be counted as a benefit when permanently changing the protected landscape of the National Park. Sand extraction would put sites out of bounds to the wider public for decades.

Nor can restoration be certain to happen where from the air countless unrestored sites can be seen as pock-marks across the landscape. In the case of Minsted, we have a site that has not been restored nor is likely to be if Minsted West goes ahead. Promoting the Minsted West extension is seen by the community as just a tactic to avoid the restoration costs if the MPA were otherwise to carry out its duty and issue a Prohibition Order on Minsted sandpit.

- (xi) As part of the ongoing ROMP determination a Mitigation and Enhancement Strategy for Minsted Quarry, dated 17 December 2018, by The Ecology Co-op – Environmental Consultants was submitted on behalf of the operator. This refers to the restoration plan, which includes restoring wildlife habitats, and we note in particular the implications of the following in terms of the possible future use of the processing area taken from page 19 of the strategy: *"It is understood that the most*

important area for invertebrate assemblages (the land to the immediate north of the existing quarry) will be retained, however with this being located within Area 8 (the working yard), it is possible that some important areas (sandy spoil heaps) will be moved and damaged. To ensure that suitable nesting habitat is always available for the species recorded it is recommended that at least two sandy spoil heaps remain undisturbed each year and exclusion zones are created around them. The continued use of the site will maintain suitable nesting sites through the trampling of the ground by machinery and the creation of sandy spoil heaps during works. These habitats will remain and continue to provide suitable nesting habitats when decommissioned.”

- (xii) Whilst difficult to describe here without using an illustration we presume this would make the existing processing plant and concrete batching facility area unsuitable for any future processing facility linked to any additional sand working such as Minsted West to the south. This needs to be considered as a factor in this consultation, and we would question the adequacy of this Mitigation Statement and Enhancement Strategy as part of the ROMP, because it lacks clarity about what is proposed where or when.
- (xiii) Minsted West is a proposed extension to the south of the existing Minsted sand quarry, and it is considered fundamentally unsuited to mineral development because any assessment of it must take account of the unresolved issues relating to the existing site. These include:
- **Visibility.** The site is visible from many local viewpoints and distant elevated locations to the south from The Downs including The South Downs Way. The cumulative impacts of mineral development would be of detrimental impact on the special qualities and character of this part of the SDNP, inconsistent with National Parks’ purposes and duty. The importance of the openness of the site and views across it are recognised in the emerging Stedham with Iping Neighbourhood Development Plan for the period 2018 – 2033. The tranquility of the area is also a particular quality of the location.
 - **Nature Conservation.** The site is in close proximity to important nature conservation areas with rare habitats including Iping and Stedham Common Local Nature Reserve and SSSI, Henfield Wood Site of Nature Conservation Importance (SNCI), Stedham Common (east of Minsted Road) SNCI, and the Severals Rare Mires.
 - **Hydrology.** Mineral development will require deep excavation, the movement of substantial quantities of overburden that will cause additional noise and disturbance. Additionally, there will be an impact on surrounding groundwater levels, including the wet heath areas of Stedham Common within Iping Common SSSI as well as the mechanical

connection to 'local running water' events within the sands that has the potential to affect land away from the site. The location of a nearby group of houses is not called "Quags Corner" without good reason because they are low lying, on boggy ground and at risk of any local flooding.

- **Woodland.** There are wooded areas adjacent to the site including Fitzhall Rough and Starveacre Copse, as well as individual trees that are likely to be harmed by changes to the local hydrology.
- **Dark Skies.** Minsted is within a tranquil countryside location being a noted area of dark skies which would be adversely affected by further mineral development and overnight security lighting.
- **Public rights of way.** The site is readily visible from multiple public rights of way. The already diverted Bridleway 907 would require another potentially long diversion, together with bridleway 3358 and footpath 903 affecting its recreational enjoyment, convenience, use and value.
- **Amenity Harm.** Renewed mineral development would perpetuate the kind of significant harm Minsted has endured, from the mid-eighties onwards until workings were ordered to be ceased in 2013, which impacted on the amenity of the many visitors to Stedham and Iping's Local Nature Reserve, the unique countryside and our community.
- **Traffic and Pollution.** Properties in or close to Minsted Road, Andrew's Lane and Quag's Corner, especially those that are immediately adjacent to the proposed boundary of working, would bear the brunt of the movements of HGV quarry traffic. We also know from when the Sandpit was working that Minsted lorries often travel through Midhurst, which caused many complaints from the town's residents for noise, pollution, the shaking of buildings and repeated damage to roads.
- **Air Quality.** Recent evidence of traffic pollution measurements for Midhurst shows that it is already suffering from excessive HGV movements because of the infilling work on the West Lavington sandpit. Midhurst already breaches EU Air Quality Standards and Chichester District Council is understood to be working towards declaring Midhurst an Air Quality Management Area. That is before any increase in HGV traffic that additional sand quarries would create.
- **Noise.** Apart from road noise the Sandpit's excavators, dumper trucks, dredger and its processing and concrete-batching plant created a major neighbourhood nuisance, more so in view of its close proximity to the adjoining SSSI. On taking over operations around 2005 the present operator changed from quiet, environmentally friendly electric power to diesel powered equipment.

- **Site Pollution.** Airborne pollution included diesel fumes from fixed and mobile plant permeating the footpaths and dust blown around the vicinity. There were also indications that the groundwater was being contaminated with no fish having survived in the lake, which still has an alarming bright yellow colour after standing undisturbed for 5 years during the site's suspension.
- **Biodiversity.** The area is home to much valued and often rare species of, for example, animals, plants, birds, bats, reptiles, amphibians and insects as recorded in the Sussex Biodiversity Record Centre, all of which need protection. We are attaching their report (**Appendix 1**) which is centred on the Footpath and Bridleway 907 that divides Minsted Sandpit from Minsted West and which is planned to be abolished.
- **Archaeology.** Adjacent to the proposed site is the one remaining Bronze Age barrow sitting atop the western cliff of Minsted Sandpit. This is part of a set of 4 barrows that extend into Fitzhall. Four other barrows have already been consumed by Minsted Sandpit excavations.
- **Heritage.** There are older and newer properties in Minsted itself most of which exhibit inherent heritage attributes through conversion from older properties. There are five listed buildings in the vicinity and in addition cottages in Andrews Lane are listed as having heritage value in the Stedham with Iping Neighbourhood Plan, the settings to which will be harmed.
- **Access.** The only vehicular access to the site via the narrow, essentially single lane Minsted Road is unsuitable for HGV mineral traffic because of the conflict with walkers, cyclists and equestrian users and existing agricultural and local residential traffic. Its width varies from 3.00M at the narrower points to an average 3.60M, and at its very widest (extended somewhat by lorry traffic) of 4.15M. The operator's Volvo FMX460 trucks have a cab width of 3.09M (including mirrors) and therefore take up most or all of the road. Minsted Road includes the steep brow of a hill about 100M from the A272 which hides any advance view of oncoming traffic.

The only passing places consist of the verges by two entrances to Stedham Common, which are frequently obstructed by vehicles of visitors to the common walking their dogs. In any case, all the ad-hoc passing places and verge-parking areas along Minsted Road to the sandpit are illegal as they have been created by destroying registered common land on both sides of the road.

Minsted road contains no pavement, no speed limit sign, no warning sign for the reduced hill-brow visibility, and no signs for any of the five side

turnings into housing areas; and yet this inadequate road serves twenty dwellings, all of which will be affected by the sandpit's noise and traffic, as well as the very active dairy farm. Furthermore, any further urbanisation of this road through signage is strongly opposed as it will be a permanent reminder of the continuing attempted destruction of this rural setting. In fact, we cannot think of a less suitable service road for heavy sandpit traffic.

- **Several West Access.** One of the options stated is to re-open the old section of the A272 which is a loop of road crossing Woolmer Bridge. At the western end it exits onto the new A272 some 270 metres from Minsted Road. The eastern end becomes a footpath between the A272 and the Severals. This section of old road contains a Public Footpath; a Bridleway; a designated cycleway to Midhurst; part of the Serpent Trail; and adjoins Stedham Common SNCI. It passes within a few metres of Woolmers Bridge Farm gates. The consequent loss of amenity and the constant risks to farm animals as well as the farm's own traffic makes this proposal completely unacceptable as an HGV route.

Question 6: Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

Yes. Minsted East M/CH/8B

The decision taken by the Planning Inspector to exclude Minsted East following the June 1998 Public Inquiry should be setting the precedent now, not just for Minsted East but for all decisions in respect of the "Vista" which he describes, and which comprises all four sites.

We repeat the Inspector's reasoning now because it is the only authoritative, legal and relevant decision that can be drawn on for comparison. The arguments then for Minsted East are the same today and are equally applicable to Minsted West and have much in common with the Severals; they remain valid, 20 years on, for why Minsted West should never be developed, particularly with the subsequent designation of the National Park.

Several East is adjacent to Several West; Several West is less than 100 metres from Minsted East; Minsted East is 400 metres from Minsted West, all virtually contiguous in less than a 2km stretch of land.

If just one of these sites falls to sand extraction then the harm to the Vista opens the pathway to all of them falling once the reasons for retaining the Vista diminish in importance, and the Vista itself loses its own outstanding natural beauty. Little by little an industrial site of potentially huge proportions is capable of being spawned.

Extracts from Minsted East decision, 1998 Public Inquiry.

“...the Council considered that the impact of mineral working on the landscape, on residential amenities and the loss of agricultural land were fundamental reasons why the omission site should not be included as a proposal site under Policy 34.

So far as the effect on the landscape is concerned, the site is within the Sussex Downs AONB and is generally flat, with a gentle slope in the eastern part down to the Woolmer Brook. Beyond the northern boundary lies the small enclave of residential development which comprises Quags Comer. Open farmland extends beyond the southern boundary which contains the small hamlet of Minsted. The area is well endowed with woodland, either as coniferous plantations, small copses or strongly defined hedgerows.

A mineral operation on the site as described in the objection would result in a lake with clearly defined cliffs or lake margins. A dredger would float on the lake surface. Landscaped earth bunds would almost certainly be built around the site to screen local views into the sand pit and to act as noise attenuation barriers. The objection stated that views of the site would be contained, but I do not agree. Not only would the site be seen from the footpath alongside the southern boundary, the Minsted Road and residential properties at Quags Comer and Minsted, it would also be seen from the South Downs Way about 4km distant and footpaths or bridleways which lead to and from the South Downs ridge.

The view from the Downs is part of a vista which, as one would expect, includes a wide variety of landforms, land cover and land uses. Nevertheless, I consider that mineral working on the omission site would be prominent when seen from the Downs and would have a significantly adverse impact in the AONB. In addition, the local landscape would be harmed by the introduction of artificial screen mounding around the site in an area where the currently active operation cannot be seen.

The impact on residential amenities would be felt mostly of all by those who live in the several houses at Quags Comer and Nos 6 & 7 Slygates. Two aspects would be most noticeable, the effect on the outlook and noise. Mineral working on the site would be directly overlooked from the houses on the northern boundary. The impact would be even more noticeable as the properties have a southerly outlook onto the site. Without any form of bunding, the view would be directly into the operation. However, the construction of artificial earth mounds, sufficiently effective to act as a screen, would create just as much as an intrusion as the operation. As explained in para 64 of PPG1, it is not the purpose of the planning system to protect the private interests of one person against the activities of another. Nevertheless, where several properties would be affected to the degree which I can foresee, I consider that the outlook

would be severely harmed. _Tree and shrub planting might offer a very long term solution, but one which would take years beyond the period of the Plan to be as effective as they need to be. Therefore, I do not see short term planting as a means of overcoming the harm to the appearance of the area as seen from Quags Comer.

The noise from the operation would not be as great as one where there would be processing. Nevertheless, the initial ground clearance would be extremely disturbing and the subsequent pumping would be continuous. The operation may well be able to work within the noise levels advised in MPGII. However, the site is so remote and the background noise likely to be so low, that any additional noise of machinery, especially running on a day in day out basis, would be troublesome. Therefore, in my opinion, the intrusion which would be caused by a mineral operation on the omission site would be sufficient to cause significant harm to the residential amenities of those who live nearby.

The objection states that the noise issue could be dealt with satisfactorily at the planning application stage, but in the face of a lack of evidence to support that view, I am not convinced.

There is frequently an advantage in developing an extension to an existing operation, rather than opening up a new site. However, in this case, despite the close proximity of the Minsted sandpit, the character and appearance of the site and immediate surroundings is of a tranquil, relatively remote rural area and so the impact of operations at the site would have all the intrusive effects of a green field site being developed.

Nearly two thirds of the site is underlain by best and most versatile agricultural land. Restoration of the site to its former state as agricultural land would be unlikely given the depth of the deposit.

The Council and objector differed on the amount of reserves which remain to be worked in the existing pit at Minsted

The Council commented that, if the site were to be worked, a nature conservation restoration scheme could have some attributes. However, because of the harm that would be caused to the landscape and the character and appearance of the countryside by working the omission site and the effect on residential amenities of the people who live at Quags Comer and also at Slygates, I do not support the objection and shall not recommend the site for inclusion in Policy 34 of the Plan”.

Question 7: Are there any sites that we should be considering that are not included in the Soft Sand Site Selection Report (4SR)?

No.

Question 8: Do you have any comments on the sustainability appraisal of the potential sites?

Yes.

Minsted West. In the site selection it is stated that there is *“Potential for further screening planting to mitigate some impacts to the south of the site, although longer views would be lost as a result. Cumulative impacts with existing site and long-term restoration issues. Re-routing of the PROW, which crosses to the south of the existing site, would be necessary. Restoration proposals would be key to this site and should be contiguous with that of the existing site that are proving to be difficult to resolve. Water quality is considered to be a significant long term issue.”* In response to this we are concerned that screening would indeed cause views to be lost, especially to the West and South from Minsted Road including to Fitzhall Woods and, depending on the height of screening, some obliteration of late afternoon sun.

It is also noted that there would be water level migration if Minsted West were opened up, causing drainage of commons, flooding of farmland and watercourses. This is a serious long term risk to new and existing homes along Minsted Road to the east of the proposed new site, situated at a lower elevation than the proposed site boundary by the impact of altering water levels that maintain the streams that meet further down the lane at the bridge to the south where the road becomes a bridal path. There are piezometers around various parts of Minsted installed in previous years but apart from once in around 2006, the data has not been made available and the current ROMP application does not include adequate information on this aspect. In the interests of local hydrology, all present and past data should be requested and included as part of the decision-making process now, because of the potential critical impacts on local biodiversity.

We agree that restoration proposals are a key to this site, and based on the history of Minsted sandpit are indeed likely to be difficult to resolve. Minsted West must not therefore be justified in order to remove the current obligation to restore the existing Minsted site, despite the clear pressure being exerted by commercial interests to do just this. The Inspector’s proposed modification, among others, that removed Paragraph 6.2.23 from the JMLP, is contentious in so far as it removes an obstacle that could prevent any extension to Minsted Sandpit. Indeed, if an extension were approved it would raise further questions about unacceptable conflicts of interest with the primary objectives of the SDNPA.

In the case of Minsted West, as an extension site, it would not maintain employment opportunities, as these currently do not exist with Minsted sandpit site in suspension. Therefore, there would be no effect on the local economy, only the negative impacts of lorry traffic, creating traffic congestion through Midhurst and surrounding roads, plus noise and dust to spoil the amenity of the national park for visitors and residents, and detrimental for Midhurst tourism and passing trade.

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 sites?

Yes.

The starting point for site selection is having confidence in the figures. There can be very little confidence in an industry which is so protected that it can produce any statistic or data that is convenient to it without fear of external audit. The information we are given about the manipulation and concealment of figures at source for production, sales and reserves is not just a disgrace; it jeopardises the integrity of the entire planning process.

The second step is the process by which the industry-supplied figures are analysed by the Authority to predict future requirements. As we have set out earlier, we do not accept the statistical methods or interpretation of other local factors used to forecast demand to 2033.

The third step, having used unreliable source data and then having applied unreliable forecasting methods is to select the sites which are chosen to meet this calculated demand. The first criterium is to place all sites located in the South Downs National Park not just last in the queue but removed from the queue altogether, after which all the other options available for meeting demand and supply can be evaluated on their individual merits and suitability.

The alternative options we have suggested must be fully explored and the use of alternatives to this finite resource actively pursued. Higher weighting should be given to sites closer to the major conurbations. The three sites being proposed near Minsted are far from any major conurbation.

Lastly, we would strongly endorse these words from NPPF 58:

“Effective enforcement is important to maintain public confidence in the planning system. Enforcement action is discretionary, and local planning authorities should act proportionately in responding to suspected breaches of planning control. They should consider publishing a local enforcement plan to manage enforcement proactively, in a way that is appropriate to their area. This should set out how they will monitor the implementation of planning permissions, investigate alleged cases of unauthorised development and take action where appropriate”.

The minerals industry has been able to override the original SDNPA/WSCC joint plan policy for soft sand rejecting the enlightened approach for no new sand sites bar one in the National Park. To have the entire site selection process restarted, against the wishes of virtually the entire community, with potential to maximise the harm to the National Park suggests that the industry always get what it wants.

We trust that you energetically and fully consider all the points made and help restore the Minsted sandpit and our confidence in the minerals planning system. The sheer disbelief in the history of now 24 unenforced breaches over 15 years at Minsted Sandpit is enough to tell any observer that the balance in favour of the industry has tilted too far.

The National Park is here for everyone; it is not for the minority interests of the minerals industry to be allowed to destroy it, and we will continue to press for all sand sites in the South Downs National Park to be removed from the agenda - permanently.

Appendix 1

Sussex Biodiversity Report

Public Footpath 907, Minsted. 2015.



Desktop Biodiversity Report

Land at public footpath 907, Minsted

ESD/15/441

Prepared for Alec Fry (Minsted Residents Group)

22nd June 2015

**Sussex Biodiversity Record Centre
report regarding
land at public footpath 907, Minsted
22/06/2015**

**Prepared for Alec Fry
Minsted Residents Group
ESD/15/441**

The following information was requested:

Maps	<input type="checkbox"/>
Sussex Protected Species Register	<input checked="" type="checkbox"/>
Sussex Bat Inventory	<input checked="" type="checkbox"/>
Sussex Bird Inventory	<input checked="" type="checkbox"/>
UK BAP Species Inventory	<input checked="" type="checkbox"/>
Sussex Rare Species Inventory	<input checked="" type="checkbox"/>
Sussex Invasive Alien Species	<input checked="" type="checkbox"/>
Full Species List	<input checked="" type="checkbox"/>
Environmental Survey Directory	<input type="checkbox"/>

SNCI

Maps not requested.

SSSI

Maps not requested.

Other Designations/Ownership

Maps not requested.

Habitats

Maps not requested.

Important information regarding this report

It must not be assumed that this report contains the definitive species information for the site concerned.

The species data held by the Sussex Biodiversity Record Centre (SxBRC) is collated from the biological recording community in Sussex. However, there are many areas of Sussex where the records held are limited, either spatially or taxonomically.

A desktop biodiversity report from SxBRC will give the user a clear indication of what biological recording has taken place within the area of their enquiry. The information provided is a useful tool for making an assessment of the site, but should be used in conjunction with site visits and appropriate surveys before further judgements on the presence or absence of key species or habitats can be made. It may be that the content of this report guides the reader as to which surveys should be carried out on the site.

This report was compiled using data held at SxBRC at the time of production. SxBRC takes data validation very seriously, but cannot be held responsible for the accuracy of data included in this report.

Copyright

The Sussex Biodiversity Record Centre must be acknowledged in all documents containing any part of the information contained in this report. You can also use the whole of a SxBRC report (unedited) as an appendix in your own report.

The SxBRC operates as agent to the individuals and groups who provide their records free of charge. The data suppliers retain copyright on their data, while SxBRC retains copyright on its desktop biodiversity reports.

Data usage

The data contained within this report is for use in the project for which the data was requested. It is not to be shared with third parties for use in other projects, unless permission is granted from SxBRC.

The data may be used for 12 months, after which a replacement SxBRC report must be requested. This ensures the most up-to-date information is being used.

Ordnance Survey maps

Members of the public wishing to reproduce maps made by SxBRC under East and West Sussex County Council or Brighton and Hove City Council licences must use copying facilities that have been authorised by Ordnance Survey (OS). Further information can be found on the [OS website](#).

Impartiality

SxBRC functions as custodian of biological data. Our role is to collect, manage and disseminate wildlife and habitat data. As such, we have to remain impartial and cannot offer opinions on the biodiversity value of a given site. Similarly, we cannot put forward objections to planning applications or be involved in campaigns.

Supplying records

Our desktop biodiversity reports are only as good as the data we hold. We rely on the continuous submission of records to keep our database up-to-date. We are always grateful to receive records from ecological consultants and members of the public alike. We accept records in many different formats – please see our [website](#) for more details.

Confidential Records

The following species are not included in desktop biodiversity reports

Badgers

Badgers are one of our most recognisable native British mammals. They are not considered rare but are protected along with their setts under The Protection of Badgers Act 1992 and schedule 6 of the Wildlife and Countryside Act (1981, as amended).



It is an offence to kill, injure, or take a badger or interfere with a badger sett.

“Interference” is defined by section 3 of The Protection of Badgers Act and includes damaging or destroying a badger sett, obstructing any entrance to a sett and also disturbing a badger when it is occupying a sett. If you need to do any work near to a sett (within 30m) you must contact Natural England for guidance as your activities may require a licence.

With continued persecution of badgers, often for the most cruel and barbaric ‘sport’, badger records are not included in our species inventory reports, as it has been requested that they remain confidential.

If you need further information about badgers in your enquiry area please contact the Badger Trust Sussex. Contact details can be found on their website: www.badgertrust-sussex.org.uk

Otters

Otters are slowly making a return to Sussex after becoming extinct in the 1960s, but are nowhere near their former numbers and remain very vulnerable.

If there is a river or tributary within 1km of your enquiry area please be aware of the potential for otters in the vicinity, especially if you are undertaking operations that may impact potential otter habitat.



Otters are protected by European and UK law. It is an offence under the Wildlife and Countryside Act 1981 to kill, injure or take an otter from the wild without a licence; to damage or obstruct a holt; or disturb an otter in its resting place. Licences are required for checking holts or for carrying out work that may disturb otters, such as the management of trees that are known to be used as resting sites. Natural England are responsible for issuing these licences in England.

If you need to find out if otters have been recorded in your enquiry area, please get in touch with the Record Centre.

Wood White and Duke of Burgundy butterflies

These two rare butterfly species have a very restricted range in Sussex and records have been made confidential based on advice given from Butterfly Conservation Sussex Branch.

Other confidential records

SxBRC holds records of other species that are confidential. Confidentiality can be for a variety of reasons but is usually to benefit the site or the species. If you need to know if any confidential records have been recorded in your enquiry area, please get in touch with the Record Centre.

SUMMARY REPORT

Land at public footpath 907, Minsted

22 June 2015 ESD/15/441 Search Area: SU8521
 Alec Fry (Minsted Residents Group)

Protected Species Register (not including bats, badgers, otters or birds)

Number of species recorded 6

European Protected Species

Number of species recorded 7

Bats

Number of species recorded 6

Birds

Number of species recorded 110

Number of BoCC Red list species recorded 23

Number of BoCC Amber list species recorded 36

Number of W&CA Schedule 1 species recorded 17

Number of significant breeding bird records 27

BAP species (not including bats or birds)

Number of species recorded 60

Rare Species (not including bats, birds or otters)

Number of species recorded 189

Invasive Alien Species

Number of species recorded 7

SUSSEX PROTECTED SPECIES REGISTER

The Protected Species Register does not include bat, bird, badger or otter records. Bat and bird records are included in separate inventories, while badger and otter records are not included in SxBRC reports.

The Sussex Protected Species Register (PSR) consists of species of plants, fungi and animals that are protected under Schedules 5, 6 and 8 of the Wildlife and Countryside Act 1981 and other legislation.

Please note the following limitations to the PSR:

- PSR records are labelled so that only one record per species per grid reference is included in a SxBRC report. This will usually be the most up to date record.
- If a protected species record appears in a SxBRC biodiversity report it does not mean that the species is still present. It means that the protected species was recorded last at that time and place by the recorder listed. The implications of the record should be further evaluated, and a survey to establish the current status of the species may be required.
- If there is no record of any particular protected species, this does not confirm that the species is absent from the site in question. It may mean that it has not been recorded, that the site has not been surveyed for this species, or that the Record Centre has not been informed of its presence.
- Some sites are part of the National Dormouse Monitoring Programme (NDMP) and therefore we are likely to hold historic records/more detailed information. If NDMP is mentioned in the location name of a record and you would like the historic dormouse data for that site, please contact the SxBRC.

Wildlife Protection Legislation in England

Legislation that protects wildlife in England exists at the European and national level.

European law

Legislation produced at a European level is an EU Directive, produced to have an effect at national level as regulations. The most relevant regulation for biodiversity is the 'Conservation of Habitats & Species Regulations 2010 (informally known as 'The Habitats Directive'). Further information can be found here: www.naturenet.net/law/habsregs.html

National law

The Wildlife and Countryside Act (WCA) 1981 (as amended), strengthened by the Countryside and Rights of Way Act 2000, are together the most important legislation aimed at protecting wildlife in England. The Wildlife and Countryside Act is divided into four parts, details of which are available from: www.naturenet.net/law/wcagen.html

Species protection is provided under Schedules 1, 5, 6 and 8 of the WCA:

Schedule 1: Birds – Please refer to the Sussex Bird Inventory results and explanation sheet in your SxBRC biodiversity report.

Schedule 5: Protected animals (other than birds)

Intentional or reckless killing, injuring, taking, possessing, disturbing and selling (including parts and derivatives) as well as damaging, destroying or obstructing access to any structure or place of refuge etc. are prohibited. N.B. Protection of some species is limited to certain sections of the Act, which are indicated in the lists as follows:

Section 9(1) Protection limited to intentional killing, injury or taking.

Section 9(2) Protection limited to possessing and controlling.

- Section 9(4a)** Protection limited to damaging, destroying or obstructing access to any structure or place used by the animal for shelter or protection.
- Section 9(4b)** Protection limited to disturbing the animal while it is occupying any structure or place which it uses for shelter or protection.
- Section 9(5a)** Protection limited to selling, offering for sale, possessing or transporting for the purpose of sale (live or dead animal, part or derivative).
- Section 9(5b)** Protection limited to advertising for buying or selling such things.

Schedule 6: Animals which may not be killed or taken by certain methods

Methods include traps and nets, poisons, automatic weapons, electrical devices, smokes/gases and various others. Even humane trapping for research requires a licence.

Schedule 8: Protected plants and fungi

Intentional picking, uprooting, destroying, trading (including parts and derivatives) etc. are prohibited. Under the Wildlife and Countryside Act, all wild plants in Britain are protected from intentional uprooting by an unauthorised person. Land owners, land occupiers, persons authorised by either of these, or persons authorised in writing by the Local Authority for the area are however exempt from this, except for Schedule 8 species which you can see on this website: www.naturenet.net/law/sched8.html

Legislation protecting bats

Please refer to the explanation sheet of the Sussex Bat Inventory within your SxBRC biodiversity report, or visit the [SxBRC website](#).

Legislation protecting badgers and otters

Please refer to the 'Confidential Records' sheet at the start of the report for information on badger and otter records in Sussex.

SUSSEX PROTECTED SPECIES REGISTER REPORT

Please note that bat, bird, badger and otter records are not included in this report.

Land at public footpath 907, Minsted

22 June 2015 ESD/15/441 Search Area: SU8521
 Alec Fry (Minsted Residents Group)

Arvicola amphibius

European Water Vole

Terrestrial mammal

The fastest declining native British mammal, the water vole was 'Ratty' in Wind in the Willows. Water voles prefer slow flowing streams, rivers and dykes with steep earth banks and luxuriant emergent vegetation. They have been in decline for over a century mainly due to loss of habitat while the presence of American mink has greatly hastened this decline. In many areas of mainland Britain water voles are already extinct but there are still some strong populations in Sussex. A legally protected species, listed on the Sussex Rare Species Inventory and the subject of a Sussex Species Action Programme.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; Sussex Biodiversity Action Plan; Sussex Protected Species Register; Sussex Rare Species Inventory; UK Biodiversity Action Plan priority species; Wildlife and Countryside Act 1981 Schedule 5 Sections (9.1 killing/injuring; 9.1 taking; 9.2; 9.4; subdivision a; 9.4b; 9.5a; 9.5b; Schedule 5)

Grid Reference	Recorder	Date	Locality
SU856219	Andrew Tittensor	1970 - 1975	Stedham and Iping Commons SSSI

Muscardinus avellanarius

Hazel Dormouse

Terrestrial mammal

A nocturnal species of woodland and overgrown hedgerows. Dormice spend much of their time climbing among branches in search of fruit, nuts, insects and other food. They sleep in nests during the day in hollow trees, unoccupied bird or bat boxes and similar places and hibernate in winter. Dormice occur mainly in southern England in this country and are widespread in suitable habitats in Sussex.

Designations

European Protected Species; Habitats Directive Annex 4; Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; Sussex Biodiversity Action Plan; Sussex Protected Species Register; UK Biodiversity Action Plan priority species; Wildlife and Countryside Act 1981 Schedule 5 Sections (9.4b; 9.5a; 9.5b; Schedule 5)

Grid Reference	Recorder	Date	Locality
SU856219	Andrew Tittensor	1970 - 1975	Stedham and Iping Commons SSSI

Anguis fragilis

Slow-worm

Reptile

A legally protected legless lizard resembling a small snake. Slow-worms are widespread in southern England and found in open habitats such as rough grassland, heath and on road and railway embankments. They are often common in urban and suburban areas. Like most reptiles and amphibians they have declined considerably and need protection wherever they occur.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; Sussex Biodiversity Action Plan; Sussex Protected Species Register; UK Biodiversity Action Plan priority species; Wildlife and Countryside Act 1981 Schedule 5 Sections (9.1 killing/injuring; 9.5a; 9.5b)

Grid Reference	Recorder	Date	Locality
SU8500021933	Recorder @ Surrey ARG	01/06/2013	Iping Common
SU8505521763	Phil Price	06/04/2012	Iping Common
SU8505521764	Recorder @ Surrey ARG	04/05/2013	Iping Common
SU8505921759	Phil Price	17/04/2011	Iping Common, West Sussex (VC13)
SU8506121722	Recorder @ Surrey ARG	04/05/2013	Iping Common
SU8507221786	Phil Price	07/05/2012	Iping Common
SU8507721785	Recorder @ Surrey ARG	01/06/2013	Iping Common
SU8507921781	Phil Price	20/08/2011	Iping Common
SU8507921785	Phil Price	11/03/2012	Iping Common
SU8508221785	Phil Price	06/04/2012	Iping Common
SU8508221789	Recorder @ Surrey ARG	01/09/2012	Iping Common
SU8509221725	Recorder @ Surrey ARG	01/06/2013	Iping Common
SU8509721745	Anne Goodenough	14/04/2012	Iping Common
SU8510821769	Phil Price	16/05/2015	Iping Common, Tin: IPC-007T
SU8511021791	Recorder @ Surrey ARG	09/03/2013	Iping Common
SU8515721913	Phil Price	20/08/2011	Iping Common
SU8516121921	Phil Price	17/06/2012	Iping Common
SU8516121922	Recorder @ Surrey ARG	01/09/2012	Iping Common
SU8521	SARG Sussex Amphibian & Reptile Grp;Dennis Dey	19/07/1995	Minsted Road, near Stedham Common, West Sussex (VC13)
SU853219	SARG recorder	12/09/2001	Stedham Common
SU856218	SARG Sussex Amphibian & Reptile Grp	1995	Stedham Common
SU856219	A Allen	1975	Stedham and Iping Commons SSSI

Natrix natrix

Grass Snake

Reptile

A widespread, but legally protected, snake with a normally olive body flecked with black and a distinctive yellow collar. Frequent in Sussex near places where its food, largely frogs, is readily available. Like most reptiles and amphibians, grass snakes have declined considerably and need protection wherever they occur.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; Sussex Biodiversity Action Plan; Sussex Protected Species Register; UK Biodiversity Action Plan priority species; Wildlife and Countryside Act 1981 Schedule 5 Sections (9.1 killing/injuring; 9.5a; 9.5b)

Grid Reference	Recorder	Date	Locality
SU8510821769	Phil Price	08/05/2011	Iping Common, West Sussex (VC13)
SU8521	SARG Sussex Amphibian & Reptile Grp;Dennis Dey	01/01/1992	Stedham Common, West Sussex (VC13)
SU856218	David Randall	21/10/2000	On the gas main, Eastern end., Stedham Common
SU856219	A Allen	1975	Stedham and Iping Commons SSSI

Zootoca vivipara

Common Lizard

Reptile

The most abundant British lizard and widespread in Sussex in the Weald and along the coast. Probably under-recorded and increasingly confined to small areas of open sunny habitat. A legally protected species due to concern about its overall decline.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; Sussex Biodiversity Action Plan; Sussex Protected Species Register; UK Biodiversity Action Plan priority species; Wildlife and Countryside Act 1981 Schedule 5 Sections (9.1 killing/injuring; 9.5a; 9.5b)

Grid Reference	Recorder	Date	Locality
SU8500121928	Anne Goodenough	18/09/2010	Iping Common
SU8500321865	Recorder @ Surrey ARG	19/05/2013	Iping Common
SU8502121962	Phil Price	16/05/2015	Iping Common
SU850216	SARG Sussex Amphibian & Reptile Grp;Dennis Dey	29/06/1991	Iping Common, West Sussex (VC13)
SU8502621735	Anne Goodenough	14/04/2012	Iping Common
SU8505521763	Phil Price	06/04/2012	Iping Common
SU8505721756	Phil Price	25/06/2011	Iping Common, West Sussex (VC13)
SU8505721760	Recorder @ Surrey ARG	06/04/2013	Iping Common
SU8505821763	Phil Price	20/08/2011	Iping Common
SU8506121722	Phil Price	25/06/2011	Iping Common, West Sussex (VC13)
SU8506621630	Recorder @ Surrey ARG	19/05/2013	Iping Common
SU8507721785	Recorder @ Surrey ARG	01/06/2013	Iping Common
SU8507921785	Phil Price	11/03/2012	Iping Common
SU8509221725	Recorder @ Surrey ARG	06/10/2012	Iping Common
SU8509621738	Phil Price	06/04/2012	Iping Common
SU8509721745	Phil Price	20/08/2011	Iping Common
SU8509721746	Recorder @ Surrey ARG	13/07/2013	Iping Common
SU8510021755	Recorder @ Surrey ARG	01/09/2012	Iping Common
SU8510421772	Phil Price	07/05/2012	Iping Common
SU8510821769	Phil Price	08/05/2011	Iping Common, West Sussex (VC13)
SU8511021791	Phil Price	07/05/2012	Iping Common
SU8511121872	Phil Price	17/06/2012	Iping Common
SU8511421874	Anne Goodenough	18/09/2010	Iping Common
SU851219	John Hodgson	14/04/2009	Iping Common
SU8515621926	Recorder @ Surrey ARG	01/09/2012	Iping Common
SU8515721913	Phil Price	20/08/2011	Iping Common
SU8515921925	Phil Price	17/06/2012	Iping Common
SU8521	Sarah Patton	28/03/2007	Stedham Common
SU8521221999	Phil Price	06/08/2011	Iping Common
SU856218	SARG Sussex Amphibian & Reptile Grp	1995	Stedham Common
SU856219	Elizabeth Haslewood;Geoff Haslewood	17/06/1985	Stedham and Iping Commons SSSI
SU8580421919	Anne Goodenough	14/04/2012	Iping Common

Vipera berus

Adder

Reptile

Britain's only venomous snake, though incidences of snakebite involving man or domestic animals are relatively uncommon. Adders have a distinctive zig zag pattern of black or brown and white. They occur in open areas on downs, heaths and in heathy woods. Grass snakes and slow-worms are often misidentified as adders. Though widespread in Britain and found in suitable areas across Sussex, the adder, like all our native reptiles has declined substantially through habitat loss and other factors. The adder is a protected species and it is illegal intentionally to kill or injure them.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; Sussex Biodiversity Action Plan; Sussex Protected Species Register; UK Biodiversity Action Plan priority species; Wildlife and Countryside Act 1981 Schedule 5 Sections (9.1 killing/injuring; 9.5a; 9.5b)

Grid Reference	Recorder	Date	Locality
SU8506121722	Phil Price	06/04/2012	Iping Common
SU8510421770	Phil Price	20/08/2011	Iping Common
SU8511021791	Phil Price	04/06/2011	Iping Common, West Sussex (VC13)
SU8521	SARG Sussex Amphibian & Reptile Grp; Dennis Dey	01/01/1992	Stedham Common, West Sussex (VC13)
SU853216	John Hodgson	30/06/2009	Stedham Common
SU856218	SARG Sussex Amphibian & Reptile Grp	1995	Stedham Common
SU856219	A Allen	1975	Stedham and Iping Commons SSSI

Bat species

There are 18 species of bat which are resident in the UK (17 of which are known to be breeding here), all of which have been recorded in Sussex:

Barbastella barbastellus **Barbastelle**
Eptesicus serotinus **Serotine**
Myotis alcathoe **Alcathoe**
Myotis bechsteinii **Bechstein's**
Myotis brandtii **Brandt's**
Myotis daubentonii **Daubenton's**
Myotis myotis **Greater mouse-eared**
Myotis mystacinus **Whiskered**
Myotis nattereri **Natterer's**

Nyctalus leisleri **Leisler's**
Nyctalus noctula **Noctule**
Pipistrellus nathusii **Nathusius's pipistrelle**
Pipistrellus pipistrellus **Common pipistrelle**
Pipistrellus pygmaeus **Soprano pipistrelle**
Plecotus auritus **Brown long-eared**
Plecotus austriacus **Grey long-eared**
Rhinolophus ferrumequinum **Greater horseshoe**
Rhinolophus hipposideros **Lesser horseshoe**

Four other bat species have been recorded in Sussex as vagrants: Savi's pipistrelle (*Hypsugo savii*), Kuhl's pipistrelle (*Pipistrellus kuhlii*), parti-coloured bat (*Vespertilio murinus*) and Geoffroy's bat (*Myotis emarginatus*).

Five species are included in Annex II of the EU Habitats Directive: Barbastelle, Bechstein's, greater mouse-eared, greater horseshoe and lesser horseshoe. All 18 species are included in Annex IV.

Seven species are included in the UK Biodiversity Action Plan: Barbastelle, Bechstein's, brown long-eared, greater horseshoe, lesser horseshoe, noctule and soprano pipistrelle.

Background

Bats are the only mammals capable of true flight. Those found in the UK feed exclusively on insects and use a sophisticated form of sonar to navigate and catch their prey at night. In late spring and summer, female bats form maternity colonies to raise their young. This is when they are most obvious to us, as they leave the roost at or after sunset in search of food. Bats hibernate during the winter when insects are scarce, usually at a different site to the maternity roost where a constant cool temperature can be found i.e. in underground sites or within deep crevices in trees or buildings. **Bats return to the same roost sites every year, so even if the animals themselves are not present, the roost is still legally protected.**

Unfortunately there are many misconceptions about bats. They are in fact sociable, intelligent, clean animals that rarely come into contact with humans. They do not build nests and very rarely cause structural damage to buildings.

Current status and threats

Bat populations have suffered huge declines in the last century. The common pipistrelle (*Pipistrellus pipistrellus*) and soprano pipistrelle (*Pipistrellus pygmaeus*) remain the most abundant and widespread species of bat, but are thought to have suffered from a huge reduction in numbers. Estimates from a National Bat Colony Survey suggest a population decline of around 70% between 1978 and 1993.

This reduction in bat numbers is largely due to their roosts being disturbed or destroyed, a loss of suitable feeding and flightline habitat (e.g. hedgerows) and a reduction in insect numbers (e.g. through farming intensification and the use of pesticides). A number of species are now included in the National Bat Monitoring Programme (NBMP), run by the Bat Conservation Trust (BCT), which gives up-to-date information on population trends.

Bats are also particularly vulnerable to human interference for the following reasons:

- They have a low reproductive rate; generally one pup a year.
- They require specific conditions for each of their roost types.
- They are very secretive and often go unnoticed until discovered by building works or home improvements.

Consequently, bats and their roosts receive some of the highest levels of legal protection.

Bats and the law

All species of bat and their roosts are protected by UK and European law. Bats and their roosts may also be protected by site designations, for example if their roost site or feeding grounds are notified as a Special Area of Conservation (SAC) or a Site of Special Scientific Interest (SSSI).

You could be committing a criminal offence if you:

1. Deliberately capture, injure or kill a bat
2. Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats
3. Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time)
4. Intentionally or recklessly obstruct access to a bat roost
5. Possess or advertise/sell/exchange a bat (dead or alive) or any part of a bat

It is **not** illegal to:

Tend/care for a bat solely for the purpose of restoring it to health and subsequent release. (This should always be done by an experienced bat handler, contact details of which can be found through the Sussex Bat Group.)

Licensing

If you have a bat roost in your property, it does not necessarily mean that building work cannot take place. Work can be planned so as not to interfere with the roost and at a time that bats may be absent. If you are planning any sort of work that may interfere with bats, advice must be sought first from Natural England (see contact details below). Similarly, if you discover bats after work has begun, you must stop and contact Natural England for their advice before continuing.

Licences to permit illegal activities relating to bats and their roost sites can be issued for specific purposes. It is an offence not to comply with the terms and conditions of such a licence. If you carry out work affecting bats or roosts without a licence, you will be breaking the law.

Further advice and information:

Bat Conservation Trust

The national charity working for bat conservation.

Website: www.bats.org.uk

Bat helpline: 0845 1300 228

Email: enquiries@bats.org.uk

Natural England

The government body responsible for issuing licences for work that may affect bats or their roosts.

Website: www.naturalengland.org.uk/ourwork/regulation/wildlife/species/bats.aspx

General and licensing enquiries. Tel: 0845 601 4523 (local rate).

Sussex Bat Group

A local voluntary group working for the conservation of bats in Sussex.

Website: www.sussexbatgroup.org.uk

Email: contact@sussexbatgroup.org.uk

SUSSEX BAT INVENTORY REPORT SUMMARY

Please note that all species of bat and their roosts are protected by UK and European law, under the Wildlife and Countryside Act 1981 (WCA) in the UK and the Habitats Directive in the EU. Bats and their roosts may also be protected by site designations, for example if their roost site or feeding grounds are notified as Special Area of Conservation (SAC) or a Site of Special Scientific Interest (SSSI).

You could be committing a criminal offence if you :

1. Deliberately capture, injure or kill a bat. 2. Intentionally or recklessly disturb a bat in the roost or deliberately disturb a group of bats. 3. Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time). 4. Intentionally or recklessly obstruct access to a bat roost. 5. Possess or advertise/sell/exchange a bat (dead or alive) or any part of a bat.

Key to Indicators

M/S Mating/Swarming
H Hibernaculum
FR Feeding Roost
MR Maternity Roost
UR Unspecified Roost
D Droppings

Land at public footpath 907, Minsted

22 June 2015 ESD/15/441 **Search Area:** SU8521

Alec Fry (Minsted Residents Group)

Common Name	Latin Name	No of Records	Key to Indicators					
			M/S	H	FR	MR	UR	D
Brown Long-eared Bat	<i>Plecotus auritus</i>	2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Common Pipistrelle (45 kHz)	<i>Pipistrellus pipistrellus</i>	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Pipistrelle sp.	<i>Pipistrellus</i>	3	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Soprano Pipistrelle (55 kHz)	<i>Pipistrellus pygmaeus</i>	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unidentified Bat	<i>Myotis</i>	2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Whiskered Bat	<i>Myotis mystacinus</i>	2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SUSSEX BAT INVENTORY REPORT

Please note that all species of bat and their roosts are protected by UK and European law, under the Wildlife and Countryside Act 1981 (WCA) in the UK and the Habitats Directive in the EU. Bats and their roosts may also be protected by site designations, for example if their roost site or feeding grounds are notified as Special Area of Conservation (SAC) or a Site of Special Scientific Interest (SSSI).

You could be committing a criminal offence if you :

1. Deliberately capture, injure or kill a bat. 2. Intentionally or recklessly disturb a bat in the roost or deliberately disturb a group of bats. 3. Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time). 4. Intentionally or recklessly obstruct access to a bat roost. 5. Possess or advertise/sell/exchange a bat (dead or alive) or any part of a bat.

Key to Indicators

M/S	Mating/Swarming
H	Hibernaculum
FR	Feeding Roost
MR	Maternity Roost
UR	Unspecified Roost
D	Droppings

Land at public footpath 907, Minsted

22 June 2015 ESD/15/441 **Search Area:** SU8521

Alec Fry (Minsted Residents Group)

Myotis

Unidentified Bat

Date	Location	Grid Reference	Recorder	Sampling Method	M/S	H	FR	MR	UR	D	Abundance	Notes
19/08/2006	Stedham Common, West Sussex (VC13)	SU8521	Sarah Patton	Moth Recording	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Present Adult	Could have been <i>Myotis mystacinus</i> or <i>M. brandtii</i> . skinner trap and moth detecting - public event.
18/08/2003	Minstead Sand Quarry, West Sussex (VC13)	SU853213	Martin Love	Aural bat detector	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Present Bat(s)	

*Myotis mystacinus***Whiskered Bat**

Very similar to Brandt's bat (*Myotis brandtii*) and only separated from that species in 1970. On average slightly smaller and with small anatomical differences. Summer roosts are mainly in buildings and trees, while winter roosts are often in tunnels and caves. Generally more common and widespread than Brandt's bat, the whiskered bat is found throughout the British Isles to the southern parts of Scotland. Widely distributed in both West Sussex and East Sussex.

Date	Location	Grid Reference	Recorder	Sampling Method	M/S	H	FR	MR	UR	D	Abundance	Notes
28/05/2005	Stedham and Iping Commons SSSI, West Sussex (VC13)	SU856219	Andrew Tittensor	Unspecified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Bat(s) Present	
1975	Stedham and Iping Commons SSSI, West Sussex (VC13)	SU856219	Andrew Tittensor	Unspecified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Bat(s) Present	

*Pipistrellus***Pipistrelle sp.**

There are three species of Pipistrelle bat found in the UK; common (*Pipistrellus pipistrellus*), soprano (*P. pygmaeus*) and Nathusius (*P. Nathusii*). Common and soprano pipistrelles were previously recorded as one species, but they are now recognised as separate species, with a peak frequency echolocation at 45 kHz and 55 kHz respectively. The following records refer to an aggregate of the two species, where the audio frequency or specific species is undetermined. Little is known about the Nathusius pipistrelle, but the other two species are found in all types of countryside (except very exposed areas) as well as in towns and suburbs. Summer roosts are usually in buildings, though tree holes and bat boxes are also used. Hibernation sites are in buildings and tree holes. Both common and soprano pipistrelles are widespread in Sussex, while Nathusius' is much rarer.

Date	Location	Grid Reference	Recorder	Sampling Method	M/S	H	FR	MR	UR	D	Abundance	Notes
28/05/2005	Stedham and Iping Commons SSSI, West Sussex (VC13)	SU856219	Andrew Tittensor	Unspecified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Bat(s) Present	
18/08/2003	Minstead Sand Quarry, West Sussex (VC13)	SU853213	Martin Love	Aural bat detector	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Bat(s) Present	
1975	Stedham and Iping Commons SSSI, West Sussex (VC13)	SU856219	Andrew Tittensor	Unspecified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Bat(s) Present	

*Pipistrellus pipistrellus***Common Pipistrelle (45 kHz)**

The common pipistrelle (*Pipistrellus pipistrellus*) and soprano pipistrelle (*P. pygmaeus*) were previously recorded as one species. They are now recognised as separate species, with a peak frequency echolocation at 45 kHz and 55 kHz respectively. Pipistrelles are the most common bat in the British Isles and are found in all types of countryside (except very exposed areas) as well as in towns and suburbs. Summer roosts are usually in buildings, though tree holes and bat boxes are also used. Winter roosts are in buildings and tree holes.

Date	Location	Grid Reference	Recorder	Sampling Method	M/S	H	FR	MR	UR	D	Abundance	Notes
19/08/2006	Stedham Common, West Sussex (VC13)	SU8521	Sarah Patton	Moth Recording	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Present Adult	Skinner trap and moth detecting - public event.

*Pipistrellus pygmaeus***Soprano Pipstrelle (55 kHz)****BAP**

For a while considered as a variant of the common pipistrelle, the soprano pipistrelle is now recognised as a separate species. Pipistrelles are the most common bat in the British Isles and are found in all types of countryside (except very exposed areas) as well as in towns and suburbs. This species has a stronger association with water than common pipistrelle. Summer roosts are usually in buildings, though tree holes and bat boxes are also used. Winter roosts are in buildings and tree holes.

Date	Location	Grid Reference	Recorder	Sampling Method	M/S	H	FR	MR	UR	D	Abundance	Notes
18/08/2003	Minstead Sand Quarry, West Sussex (VC13)	SU853213	Martin Love	Aural bat detector	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Bat(s) Present	

*Plecotus auritus***Brown Long-eared Bat****BAP**

One of the more common British bat species, but difficult to distinguish from the much rarer grey long-eared bat (*Plecotus austriacus*), unless in the hand. It frequents woodland and orchards and has summer roosts in older buildings and trees. It often hibernates in caves, tunnels and mines. The brown long-eared has declined in the British Isles though it remains widespread.

Date	Location	Grid Reference	Recorder	Sampling Method	M/S	H	FR	MR	UR	D	Abundance	Notes
28/05/2005	Stedham and Iping Commons SSSI, West Sussex (VC13)	SU856219	Andrew Tittensor	Unspecified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Bat(s) Present	
1975	Stedham and Iping Commons SSSI, West Sussex (VC13)	SU856219	Andrew Tittensor	Unspecified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Bat(s) Present	

SUSSEX BIRD INVENTORY



The SxBRC holds nearly 1.5 million bird records provided by the Sussex Ornithological Society (SOS), ranging from 1990 onwards. Records within the breeding season of species classed as sensitive in Sussex are not included in the Bird Inventory report. Any breeding season records of these species within your search area will be flagged up at the top of the report. It is recommended that the SOS is contacted directly for further information as the birds in question will be protected by law and may be affected if potentially damaging operations are to be carried out. The list of withheld species is available on [our website](#).

Icons used in the Bird Inventory:



Schedule 1 birds

Schedule 1 of the Wildlife and Countryside Act 1981 provides an additional tier of protection so that rare species are specially protected by increased penalties and cannot be intentionally or recklessly disturbed when nesting. **Schedule 1 status also infers a right of arrest** by a police officer if someone is suspected of committing certain offences against one of these species.

BAP Biodiversity Action Plan Species (UK BAP)

Twenty-six species of bird are identified as Priority Species in the UK Biodiversity Action Plan (UK BAP), each the subject of a dedicated action plan which seeks to reverse their declines and protect vulnerable populations. Any Priority Species recorded within your enquiry area will be indicated in the species information of the bird report. Further details of BAP bird species can be found on the [JNCC website](#).



Natural Environment & Rural Communities (NERC) Act

There are 49 bird species on the England Biodiversity List which was drawn up to meet the requirements of Section 41 of the Act. Further details of the NERC Act can be found on the [Natural England website](#).

Birds of Conservation Concern 3 (2009)

Every five years the leading governmental and non-governmental conservation organisations in the UK review the population status of the 247 species of bird that are regularly found in the UK. There are three lists – Red, Amber and Green - into which each of the species has been placed. 40 species are Red-listed, 121 are Amber-listed and 86 are Green-listed. The status decisions are based on several factors which include: the species' global and European conservation status; recent and historical decline; whether it is a rare breeder; if it is only confined to a few sites in the UK; and if the species is of international importance.



Red List species are those that are **Globally Threatened** according to IUCN criteria; those whose population or range has decline rapidly in recent years; and those that have declined historically and not shown a substantial recent recovery.



Amber List species are those with **Unfavourable Conservation Status** in Europe; those whose population or range has declined moderately in recent years; those whose population has declined historically but made a substantial recent recovery; rare breeders; and those with internationally important or localised populations.

Green List species are those that do not fulfil any of the above criteria. Some of these species are however protected by law and the list includes some Schedule 1 species which have the highest level of protection. A green icon will not appear in our reports.

This information has been obtained from '**Birds of Conservation Concern 3' (BoCC3)** which can be downloaded from the [RSPB website](#).

Other bird legislation and conservation measures:

Wildlife and Countryside Act (WCA) 1981

All British birds, their nests and eggs are protected by UK law. It is an offence to take, kill or injure any wild bird or to take, damage, destroy any nest or egg of any wild bird under Part 1 of the Wildlife and Countryside Act 1981, Schedules 1-4.

Hedgerow removal and birds

It is advisable not to trim, cut or remove hedgerows during the bird nesting season. You will be violating the Wildlife and Countryside Act if there are birds nesting within it due to the disturbance or destruction of their habitat whilst nesting. The Hedgerows Regulations were introduced in 1997 to protect important hedgerows in the countryside. The regulations state that it is a criminal offence, unless an exception applies, to deliberately remove or otherwise destroy a hedgerow without permission. Please apply to your local planning authority for a Hedgerow Removal Application. Domestic hedges are not included in this regulation, however it is still illegal to cut or remove any hedges if birds are suspected to be nesting in it.

Birds in roofs

There are various species that may nest in roofs. Unless they are causing a health hazard, the nests, eggs and chicks are protected by law. The parent birds must not be prevented from gaining access to their nest. Many of the birds that use roof spaces are now species of conservation concern because of their population decline over the past 25 years. Starlings and House Sparrows are Red-listed, while Barn Owls, House Martins and Swallows are Amber-listed (see next page for details). Roofs are also important for Swifts.

Further information about birds and the law can be found on the [RSPB website](#).

Environmental Stewardship Target Species

Farmland birds are one of the key targets of which a landowner can be awarded points through the Higher Level Stewardship scheme. Each Joint Character Area (e.g. High Weald, South Downs, South Coast Plain etc.) has specific key bird species whose populations must be maintained or enhanced to gain points as part of the land owner's 'Farm Environment Plan'. This can be done through a combination of management practices which should provide year round habitat requirements, in locations where these birds are known to be present or within 2km of such sites. If a key farmland bird species appears in your report, it will show to which Joint Character Area it is linked.

Further information about agri-environment schemes can be found on the [RSPB website](#).

EU Birds Directive

The Birds Directive addresses the conservation of all wild birds throughout the European Union, including marine areas, and covers their protection, management, control and exploitation. It applies to the birds, their eggs, nests and habitats. It places a broad requirement on Member States to take necessary measures to maintain the populations of all wild birds at levels determined by ecological, scientific and cultural needs. In doing so, Member States must also consider economic and recreational needs.

The Directive divides into two main parts: **habitat conservation** and **species protection**. In summary, it requires Member States to preserve, maintain and re-establish sufficient diversity and area of habitats for all wild birds.

Annex 1:

Species listed in Annex 1 of the Birds Directive are the subject of special conservation measures concerning their habitat to ensure their survival and reproduction. This includes the designation of areas as Special Protection Areas (SPAs).

Annex 2:

Annex 2 of the Birds Directive lists birds that can be hunted under the legislation of the Member States. The Directive bans certain non-selective methods of hunting and defines the limits within which Member States can set the hunting season.

Further information about the EU Birds Directive can be found on the [BirdLife website](#).

IUCN Red List

The World Conservation Union (IUCN) has been assessing the conservation status of species, subspecies, varieties and even selected sub-populations on a global scale in order to highlight taxa threatened with extinction, and therefore promote their conservation. The IUCN Red List (different from the previously mentioned Red List) is the world's most comprehensive inventory of the global conservation status of plant and animal species. It uses a set of criteria to evaluate the extinction risk of thousands of species and subspecies. These criteria are relevant to all species and all regions of the world. With its strong scientific base, the IUCN Red List is recognized as the most authoritative guide to the status of biological diversity.

Further information about the Red List can be found on the [IUCN website](#).

SUSSEX BIRD INVENTORY REPORT SUMMARY

N.B. The breeding season records of 15 Schedule 1 birds and three other species which are classed as sensitive in Sussex are not included in our biodiversity reports (see www.sxbrc.org.uk/data-requests/SOS-excluded-data.pdf for list of excluded species). 27 such records have been flagged up in this search. The Sussex Ornithological Society (SOS) should be contacted directly for more information on these records if potentially damaging operations are to occur in the enquiry area. Email: conservation@sos.org.uk

Land at public footpath 907, Minsted

22 June 2015 ESD/15/441 Search Area: SU8521

Alec Fry (Minsted Residents Group)

Common Name	Latin Name	First Date	Last Date	No. of Rec's	Total Abundance	Max. Abundance
Mandarin Duck	<i>Aix galericulata</i>	28/04/1989	08/04/1991	3	4	2
Mallard	<i>Anas platyrhynchos</i>	31/12/1976	16/11/2013	34	180	100
Greylag Goose	<i>Anser anser</i>	28/05/1990	21/05/2013	3	6	3
Emperor Goose	<i>Anser canagicus</i>	25/10/1988	-	1	1	1
Canada Goose	<i>Branta canadensis</i>	28/05/1990	21/08/2013	20	832	200
Bewick's Swan	<i>Cygnus columbianus subsp. bewickii</i>	11/01/1987	-	1	2	2
Swift	<i>Apus apus</i>	31/12/1976	12/05/2013	15	5	1
Little Ringed Plover	<i>Charadrius dubius</i>	18/07/1985	14/06/1998	24	49	4
Black-headed Gull	<i>Chroicocephalus ridibundus</i>	31/12/1976	16/11/2013	14	1149	250
Herring Gull	<i>Larus argentatus</i>	01/05/2006	24/11/2011	3	5	3
Common Gull	<i>Larus canus</i>	15/08/1998	21/08/2013	18	1509	300
Lesser Black-backed Gull	<i>Larus fuscus</i>	03/09/2011	02/08/2012	3	6	4
Common Sandpiper	<i>Actitis hypoleucos</i>	19/04/1992	20/06/2004	5	7	2
Snipe	<i>Gallinago gallinago</i>	31/12/1976	10/02/2002	3	12	6
Jack Snipe	<i>Lymnocyptes minimus</i>	06/11/1988	-	1	1	1
Whimbrel	<i>Numenius phaeopus</i>	02/05/1993	-	1	1	1
Woodcock	<i>Scolopax rusticola</i>	31/12/1976	06/11/2012	77	152	25
Redshank	<i>Tringa totanus</i>	31/12/1999	-	2	0	0
Grey Heron	<i>Ardea cinerea</i>	31/12/1976	27/09/2011	9	5	2
Rock Dove	<i>Columba livia</i>	12/05/2013	-	1	2	2
Stock Dove	<i>Columba oenas</i>	31/12/1976	12/05/2013	28	29	2

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Common Name	Latin Name	First Date	Last Date	No. of Rec's	Total Abundance	Max. Abundance
Woodpigeon	<i>Columba palumbus</i>	31/12/1976	16/11/2013	36	180	54
Collared Dove	<i>Streptopelia decaocto</i>	31/12/1976	-	1	0	0
Turtle Dove	<i>Streptopelia turtur</i>	31/12/1976	31/12/2000	13	15	4
Kingfisher	<i>Alcedo atthis</i>	25/10/2008	-	1	1	1
Cuckoo	<i>Cuculus canorus</i>	28/06/1992	21/05/2013	22	16	2
Sparrowhawk	<i>Accipiter nisus</i>	31/12/1976	23/06/2012	53	45	3
Buzzard	<i>Buteo buteo</i>	21/05/1995	16/11/2013	57	75	5
Hen Harrier	<i>Circus cyaneus</i>	19/01/1998	-	1	2	2
Red Kite	<i>Milvus milvus</i>	18/09/2011	-	1	1	1
Merlin	<i>Falco columbarius</i>	27/09/1990	-	1	1	1
Peregrine	<i>Falco peregrinus</i>	07/09/2011	05/10/2011	2	2	1
Hobby	<i>Falco subbuteo</i>	10/09/2001	-	4	6	2
Kestrel	<i>Falco tinnunculus</i>	31/12/1976	08/07/2012	136	150	10
Pheasant	<i>Phasianus colchicus</i>	31/12/1976	16/11/2013	15	17	6
Moorhen	<i>Gallinula chloropus</i>	28/05/1990	30/08/2011	2	5	3
Long-tailed Tit	<i>Aegithalos caudatus</i>	31/12/1976	29/06/2013	26	33	7
Skylark	<i>Alauda arvensis</i>	31/12/1976	23/10/2007	13	56	19
Woodlark	<i>Lullula arborea</i>	11/07/1986	28/09/2013	348	813	12
Treecreeper	<i>Certhia familiaris</i>	31/12/1976	12/05/2013	27	41	4
Carrion Crow	<i>Corvus corone agg.</i>	27/07/1996	-	1	1	1
Carrion Crow	<i>Corvus corone</i>	01/06/1995	16/11/2013	26	114	13
Carrion Crow	<i>Corvus corone subsp. corone</i>	31/12/1976	31/12/2000	15	12	3
Rook	<i>Corvus frugilegus</i>	05/06/2008	21/05/2013	6	8	2
Jackdaw	<i>Corvus monedula</i>	31/12/1976	12/05/2013	12	13	3
Jay	<i>Garrulus glandarius</i>	31/12/1976	30/04/2013	40	37	4
Magpie	<i>Pica pica</i>	31/12/1976	16/11/2013	39	44	6
Yellowhammer	<i>Emberiza citrinella</i>	31/12/1976	29/06/2013	194	420	23
Reed Bunting	<i>Emberiza schoeniclus</i>	31/12/1976	01/05/2007	23	18	2
Lesser Redpoll	<i>Acanthis cabaret</i>	22/06/1977	06/11/2012	9	42	30
Common (Mealy) Redpoll	<i>Acanthis flammea</i>	31/12/1976	31/12/1994	10	20	20
Goldfinch	<i>Carduelis carduelis</i>	31/12/1976	16/11/2013	15	8	2
Greenfinch	<i>Carduelis chloris</i>	31/12/1976	30/04/2013	15	52	40
Greenfinch	<i>Chloris chloris</i>	01/05/2002	01/05/2005	2	2	1
Chaffinch	<i>Fringilla coelebs</i>	31/12/1976	16/11/2013	49	695	32
Brambling	<i>Fringilla montifringilla</i>	01/04/1994	31/12/1994	2	4	4
Linnet	<i>Linaria cannabina</i>	31/12/1976	01/06/2013	172	453	60
Common Crossbill	<i>Loxia curvirostra</i>	25/07/1985	28/09/2013	60	190	20
Bullfinch	<i>Pyrrhula pyrrhula</i>	31/12/1976	22/07/2014	31	61	7
Siskin	<i>Spinus spinus</i>	31/12/1976	12/04/2012	86	604	50

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Common Name	Latin Name	First Date	Last Date	No. of Rec's	Total Abundance	Max. Abundance
House Martin	<i>Delichon urbicum</i>	31/12/1976	19/07/2012	8	5	1
Swallow	<i>Hirundo rustica</i>	31/12/1976	19/07/2012	13	5	1
Sand Martin	<i>Riparia riparia</i>	31/12/1976	14/07/2011	42	967	150
Great Grey Shrike	<i>Lanius excubitor</i>	31/12/1976	17/02/2001	7	6	1
Grasshopper Warbler	<i>Locustella naevia</i>	31/12/1976	-	1	0	0
Meadow Pipit	<i>Anthus pratensis</i>	31/12/1977	22/10/2011	53	377	38
Tree Pipit	<i>Anthus trivialis</i>	31/12/1976	29/06/2013	162	273	12
Pied Wagtail	<i>Motacilla alba</i>	31/12/1976	24/11/2011	3	1	1
Pied Wagtail	<i>Motacilla alba subsp. yarrellii</i>	16/11/2013	-	1	3	3
Grey Wagtail	<i>Motacilla cinerea</i>	24/01/2001	28/06/2010	3	3	2
Robin	<i>Erithacus rubecula</i>	31/12/1976	16/11/2013	47	1055	52
Pied Flycatcher	<i>Ficedula hypoleuca</i>	15/08/2003	26/08/2003	2	2	1
Nightingale	<i>Luscinia megarhynchos</i>	01/06/1980	29/06/2013	6	4	1
Spotted Flycatcher	<i>Muscicapa striata</i>	31/12/1988	25/07/2012	12	27	6
Redstart	<i>Phoenicurus phoenicurus</i>	31/12/1976	01/06/2013	5	5	2
Stonechat	<i>Saxicola rubicola</i>	31/12/1976	01/06/2013	296	651	9
Redwing	<i>Turdus iliacus</i>	31/12/1976	16/11/2013	14	148	45
Blackbird	<i>Turdus merula</i>	31/12/1976	16/11/2013	46	250	14
Song Thrush	<i>Turdus philomelos</i>	31/12/1976	21/05/2013	41	75	7
Fieldfare	<i>Turdus pilaris</i>	31/12/1976	16/11/2013	13	202	100
Mistle Thrush	<i>Turdus viscivorus</i>	31/12/1976	14/11/2012	34	34	4
Blue Tit	<i>Cyanistes caeruleus</i>	31/12/1976	16/11/2013	45	376	24
Great Tit	<i>Parus major</i>	31/12/1976	16/11/2013	45	279	16
Coal Tit	<i>Parus ater</i>	31/12/1976	08/02/2013	45	133	13
Willow Tit	<i>Poecile montana</i>	24/02/1983	28/06/1995	2	4	2
Marsh Tit	<i>Poecile palustris</i>	31/12/1976	19/07/2012	28	24	4
House Sparrow	<i>Passer domesticus</i>	31/12/1976	-	1	0	0
Tree Sparrow	<i>Passer montanus</i>	11/02/1986	05/10/1986	2	4	2
Chiffchaff	<i>Phylloscopus collybita</i>	16/06/1985	29/06/2013	39	97	10
Wood Warbler	<i>Phylloscopus sibilatrix</i>	15/06/1996	22/05/2011	5	4	1
Willow Warbler	<i>Phylloscopus trochilus</i>	31/12/1976	21/05/2013	45	251	40
Duncock	<i>Prunella modularis</i>	31/12/1976	16/11/2013	34	47	6
Firecrest	<i>Regulus ignicapilla</i>	21/09/2013	-	1	1	1
Goldcrest	<i>Regulus regulus</i>	31/12/1976	16/11/2013	41	83	10
Nuthatch	<i>Sitta europaea</i>	31/12/1976	12/05/2013	25	19	2
Starling	<i>Sturnus vulgaris</i>	31/12/1976	-	1	0	0
Blackcap	<i>Sylvia atricapilla</i>	16/06/1985	29/06/2013	38	77	8
Garden Warbler	<i>Sylvia borin</i>	31/12/1988	12/05/2013	31	29	2
Whitethroat	<i>Sylvia communis</i>	31/12/1976	01/06/2013	31	35	11

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Common Name	Latin Name	First Date	Last Date	No. of Rec's	Total Abundance	Max. Abundance
Dartford Warbler	<i>Sylvia undata</i>	31/12/1988	01/06/2013	299	673	13
Wren	<i>Troglodytes troglodytes</i>	31/12/1976	16/11/2013	48	709	38
Cormorant	<i>Phalacrocorax carbo</i>	06/11/1999	28/09/2003	2	3	2
Great Spotted Woodpecker	<i>Dendrocopos major</i>	31/12/1976	16/11/2013	81	150	7
Lesser Spotted Woodpecker	<i>Dendrocopos minor</i>	17/12/1982	21/06/1998	6	6	1
Green Woodpecker	<i>Picus viridis</i>	31/12/1976	01/06/2013	70	86	4
Great Crested Grebe	<i>Podiceps cristatus</i>	12/06/1997	20/06/2004	2	3	2
Little Grebe	<i>Tachybaptus ruficollis</i>	02/05/1984	-	1	1	1
Nightjar	<i>Caprimulgus europaeus</i>	31/12/1976	01/06/2013	140	222	8
Little Owl	<i>Athene noctua</i>	31/12/1976	29/11/1982	2	1	1
Tawny Owl	<i>Strix aluco</i>	31/12/1976	21/05/2013	18	16	2

SUSSEX BIRD INVENTORY REPORT

Land at public footpath 907, Minsted

22 June 2015 ESD/15/441 Search Area: SU8521
Alec Fry (Minsted Residents Group)

Please note that all British birds, their nests and eggs are protected in British law. It is an offence to deliberately take, kill or injure any wild bird or to take, damage, or destroy any nest or egg of any wild bird under Part 1 of the Wildlife and Countryside Act 1981 (as amended). However, Schedule 1 of this act provides an additional tier of protection so that rare species are specially protected by increased penalties and cannot be intentionally or recklessly disturbed when nesting. Schedule 1 status also infers a right of arrest by a police officer if someone is suspected of committing certain offences against one of these species. Other statuses listed below can be referenced in the attached sheets.

Aix galericulata

Mandarin Duck

Scarce introduced resident in Sussex. This ornate eastern Asian duck can be found on lakes and slow-flowing rivers with plenty of surrounding vegetation. It breeds in tree holes.

Convention on Migratory Species; Appendix 2

First Date	Last Date	No. of Records
28/04/1989	08/04/1991	3

Anas platyrhynchos

Mallard

A large common duck found throughout the British Isles both as a breeding resident and winter visitor. Can be seen in most wetland habitats including ponds in urban areas. It feeds on seeds, acorns and berries, plants, insects and shellfish. The population is supplemented each year with birds captive bred for shooting.

Bird Population Status - amber; Birds Directive Annex 2.1; Convention on Migratory Species; Appendix 2

First Date	Last Date	No. of Records
31/12/1976	16/11/2013	34

Anser anser

Greylag Goose

An increasingly common introduced resident, winter visitor and scarce passage migrant. There are truly wild populations in northern Britain. The Greylag is the largest and bulkiest of the wild geese native to our area. They are mostly found around reservoirs, lakes and gravel pits in our area where they can feed on grass and roots.

Bird Population Status - amber; Birds Directive Annex 2.1; Convention on Migratory Species; Appendix 2; Wildlife and Countryside Act 1981 (Schedule 1 Part 2)

First Date	Last Date	No. of Records
28/05/1990	21/05/2013	3

Anser canagicus

Emperor Goose

First Date	Last Date	No. of Records
25/10/1988	-	1

Branta canadensis**Canada Goose**

A common introduced resident and partial migrant, showing a grey/brown body and black neck and cap. The Canada goose was introduced around 300 years ago but was not much seen outside waterfowl collections until after World War II when it started to spread. Now the most familiar goose in the British countryside. Canada geese are a complex group of species, subspecies and hybrids. It feeds on vegetation: roots, grass, leaves and seeds.

Birds Directive Annex 2.1; Convention on Migratory Species; Appendix 2

First Date	Last Date	No. of Records
28/05/1990	21/08/2013	20

Cygnus columbianus subsp. bewicki Bewick's Swan**BAP N**

Bern Convention Appendix 2; Bird Population Status - amber; Birds Directive Annex 1; Convention on Migratory Species; Appendix 2; Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; Nerc Act 2006; UK Biodiversity Action Plan priority species; Wildlife and Countryside Act 1981 (Schedule 1 Part 1)

First Date	Last Date	No. of Records
11/01/1987	-	1

Apus apus**Swift**

A well-known common summer visitor and passage migrant, widely distributed in Sussex. This sickle-shaped medium-sized dark aerial bird only stops flying when at the nest, it even sleeps on the wing! Many towns and villages have breeding populations. Very large migration movements are sometimes recorded with many thousands of birds involved. Can be seen in large screaming parties speeding around rooftops. They feed on flying insects and airborne spiders.

Bird Population Status - amber

First Date	Last Date	No. of Records
31/12/1976	12/05/2013	15

Charadrius dubius**Little Ringed Plover**

A small wader which is a scarce breeding summer visitor and passage migrant. A species that started to colonise Britain in 1938 and which first bred in Sussex in 1949, regularly since 1970. Widespread in Sussex in suitable habitats such as shingle banks and gravel pits, where it feeds on insects.

Bern Convention Appendix 2; Convention on Migratory Species; Appendix 2; Wildlife and Countryside Act 1981 (Schedule 1 Part 1)

First Date	Last Date	No. of Records
18/07/1985	14/06/1998	24

Chroicocephalus ridibundus**Black-headed Gull**

This medium-sized gull has a chocolate-coloured head in the summer and a white head for the rest of the year. It is a common breeding species and very common to abundant passage migrant and winter visitor, occurring both inland and on the coast. This is the most numerous and widespread gull in Sussex and can be found feeding in small groups and flocks on coastal habitats as well as inland on ploughed fields and playing fields; it's diet is made up of worms, insects, fish and carrion.

Bird Population Status - amber; Birds Directive Annex 2.2

First Date	Last Date	No. of Records
31/12/1976	16/11/2013	14

Larus argentatus**Herring Gull**

BAP N

This large gull is a very common resident, but its status is uncertain as a passage migrant and winter visitor. It has suffered moderate declines over the last 25 years. It breeds, often in colonies, in coastal locations including on rooftops. Widely recorded both inland, including reservoirs and rubbish tips, and in most coastal habitats including shingle beaches. It is omnivorous and is a voracious scavenger.

Bird Population Status - red; Birds Directive Annex 2.2; Nerc Act 2006; UK Biodiversity Action Plan priority species

First Date	Last Date	No. of Records
01/05/2006	24/11/2011	3

Larus canus**Common Gull**

The Mew Gull (also known as the Common Gull) is a smaller, more gentle-looking, version of the Herring Gull. It is a very common winter visitor and passage migrant, scarce in the summer; it bred in Sussex until 1963, in 2006 and some years since then. Widely recorded both inland in towns and on farmland, and on the coast especially in estuarine habitats. It has a varied diet of worms, insects, fish, carrion and rubbish.

Bird Population Status - amber; Birds Directive Annex 2.2

First Date	Last Date	No. of Records
15/08/1998	21/08/2013	18

Larus fuscus**Lesser Black-backed Gull**

Fairly common passage migrant and winter visitor; scarce (mainly immature) in summer and a scarce breeder. Can be found in coastal areas in the summer and on farmland in the winter; roosting on large bodies of water such as reservoirs. Its an omnivore and scavenges a wide range of food.

Bird Population Status - amber; Birds Directive Annex 2.2

First Date	Last Date	No. of Records
03/09/2011	02/08/2012	3

Actitis hypoleucos**Common Sandpiper**

This smallish wader is a fairly common passage migrant, recognised by its bobbing motion and high pitched call. It is very scarce in winter, and has bred at least once. This wader is most commonly seen on muddy margins along rivers, and around pools and reservoirs.

Bird Population Status - amber; Convention on Migratory Species; Appendix 2

First Date	Last Date	No. of Records
19/04/1992	20/06/2004	5

Gallinago gallinago**Snipe**

Now a very scarce breeder and fairly common winter visitor favouring poorly drained pasture. The UK population of Snipe has undergone particularly steep declines in lowland wet grassland in the past twenty-five years. It is a plump medium-sized wader with short legs and a long bill used to probe for small invertebrates, including worms and insect larvae. Males display by flying high in the air and then dropping steeply producing a noise by vibrating their tail feathers.

Bird Population Status - amber; Birds Directive Annex 2.1; Convention on Migratory Species; Appendix 2

First Date	Last Date	No. of Records
31/12/1976	10/02/2002	3

Lymnocyptes minimus**Jack Snipe**

This small elusive wader is a scarce winter visitor and passage migrant. It is found both on coastal sites and boggy heaths inland, but usually only in low numbers. It likes shallow, wet and muddy areas with plenty of vegetation such as marshes, flood meadows, wet ditches and river banks where it can find insect, worm and snail prey. It is very well camouflaged and will sit unnoticed as you walk close-by.

Bird Population Status - amber; Birds Directive Annex 2.1; Convention on Migratory Species; Appendix 2

First Date	Last Date	No. of Records
06/11/1988	-	1

Numenius phaeopus**Whimbrel**

This large wader with a long curved bill, is a common passage migrant, and a very scarce non-breeding summering and wintering species. Usually recorded close to the Sussex coast in spring on estuaries, saltmarshes, coastal lagoons, muddy and rocky shores, nearby fields and some are seen inland. On passage they feed on crabs, shrimps, molluscs and worms.

Bird Population Status - red; Birds Directive Annex 2.2; Convention on Migratory Species; Appendix 2; Wildlife and Countryside Act 1981 (Schedule 1 Part 1)

First Date	Last Date	No. of Records
02/05/1993	-	1

Scolopax rusticola**Woodcock**

The Woodcock is a large bulky wading bird with short legs and a long tapered bill used for probing the earth for worms, beetles, spiders, caterpillars, fly larvae and small snails. It is probably a fairly common resident and winter visitor, which is found mainly in the more heavily wooded parts of The Weald as it needs large areas of moist woodland with rides, dense undergrowth and damp areas for feeding. It is well known for its "Roding" display flight when it makes lots of croak and whistle sounds while flying slowly around its territory.

Bird Population Status - amber; Birds Directive Annex 2.1; Convention on Migratory Species; Appendix 2

First Date	Last Date	No. of Records
31/12/1976	06/11/2012	77

Tringa totanus**Redshank**

A medium-sized wader with a long red bill and long red legs. It is a scarce resident in wetlands close to rivers, and a fairly common winter visitor and passage migrant. Its preferred habitats are wet grassland, estuaries and saltmarshes where it can feed on insects, earthworms, molluscs and crustaceans. Most breeding sites in Sussex are within protected areas, such as nature reserves, which employ specific management for breeding waders.

Bird Population Status - amber; Birds Directive Annex 2.2; Convention on Migratory Species; Appendix 2; Environmental Stewardship Target Species (Pevensy Levels); Environmental Stewardship Target Species (Romney Marsh); Environmental Stewardship Target Species (South Downs)

First Date	Last Date	No. of Records
31/12/1999	-	2

Ardea cinerea**Grey Heron**

A fairly common resident, the Grey Heron is increasing in numbers and can be found in most wetland areas standing silently at the water's edge waiting for fish prey. Breeds colonially in tall trees near to plentiful fish supplies.

First Date	Last Date	No. of Records
31/12/1976	27/09/2011	9

Columba livia**Rock Dove**

The Feral Pigeon comes in many different shades and is a common resident especially in urban areas; where the numbers are allowed to increase it can become a pest. This is the same species as the rock dove (not found wild in our area) and originally kept to provide food. Often under recorded but widespread in Sussex. Feeds on grain and cereals.

Birds Directive Annex 2.1; EC CITES Annex A

First Date	Last Date	No. of Records
12/05/2013	-	1

Columba oenas**Stock Dove**

This species is similar in appearance to the Feral Pigeon and is a common resident and possible winter visitor. Mostly recorded north of the Downs in ancient woods and parkland as well as cliffs and quarries. It declined considerably when organochlorine pesticides were in use, but has made a steady recovery. Feeds on seed.

Bird Population Status - amber; Birds Directive Annex 2.2

First Date	Last Date	No. of Records
31/12/1976	12/05/2013	28

Columba palumbus**Woodpigeon**

This is the UK's largest and most common pigeon and is an abundant resident and winter visitor. Found in woodland, farmland and urban areas, and can be seen in large flocks in fields in the winter. Feeds on crops like cabbages, sprouts, peas and grain. Also buds, shoots, seeds, nuts and berries.

Birds Directive Annex 2.1

First Date	Last Date	No. of Records
31/12/1976	16/11/2013	36

Streptopelia decaocto**Collared Dove**

This species is a very common resident closely associated with human habitation and can be found on farms, in gardens and in parks where it can feed on seeds and grain. After spreading across Europe, this species first bred in Britain in 1955 and arrived in Sussex in 1958; it is now found throughout the area. It has a distinctive buff plumage with a black neck collar and is usually seen in pairs. It is well known for its monotonous cooing.

Birds Directive Annex 2.2

First Date	Last Date	No. of Records
31/12/1976	-	1

Streptopelia turtur**Turtle Dove****BAP N**

A declining summer migrant that breeds at the northern edge of its range in the UK. It is confined largely to the south and east of England and is associated with fertile arable farmland in warm, dry situations where it feeds on seed. Nests in thick hedges, bushes and low trees in woodland edges, copses, commons, heaths and parkland. Easily identified by its evocative purring call.

Bird Population Status - red; Birds Directive Annex 2.2; EC CITES Annex A; Environmental Stewardship Target Species (High Weald); Environmental Stewardship Target Species (Low Weald); Environmental Stewardship Target Species (Romney Marsh); Environmental Stewardship Target Species (South Downs); Environmental Stewardship Target Species (Wealden Greensand); Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec); UK Biodiversity Action Plan priority species

First Date	Last Date	No. of Records
31/12/1976	31/12/2000	13

Alcedo atthis**Kingfisher**

A scarce to fairly common resident, and possibly very scarce winter visitor, which is widespread across Sussex, but often declines following hard winters. A brilliantly coloured blue and orange bird which can be found in lowland freshwater areas such as rivers, ponds and streams, and during the winter on the coast and in estuarine areas. Nests in hole in riverbank or sandpit.

Bern Convention Appendix 2; Bird Population Status - amber; Birds Directive Annex 1; Wildlife and Countryside Act 1981 (Schedule 1 Part 1)

First Date	Last Date	No. of Records
25/10/2008	-	1

Cuculus canorus**Cuckoo****BAP N**

The Cuckoo is a fairly common but declining summer visitor though usually absent from urban areas and has one of the best known voices of a bird in the UK. The species has shown a moderate decline. They are well-known brood parasites, the females laying their eggs in the nests of other birds. It breeds in a variety of habitats including farmland, wetland and woodland where its familiar call can be heard. It's diet consists of insects, especially hairy caterpillars.

Bird Population Status - red; Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; UK Biodiversity Action Plan priority species)

First Date	Last Date	No. of Records
28/06/1992	21/05/2013	22

Accipiter nisus**Sparrowhawk**

The Sparrowhawk is a common resident and passage migrant. A bird that decreased substantially in the middle of the last century following the widespread use of organochlorine pesticides. It has now made a good recovery and is the second commonest Sussex raptor. The Sparrowhawk's tail and wings are adapted for fast low flying through trees and branches where it catches small bird prey. It nests in trees and hedges, and they are now regular garden visitors.

Convention on Migratory Species; Appendix 2; EC CITES Annex A

First Date	Last Date	No. of Records
31/12/1976	23/06/2012	53

Buteo buteo**Buzzard**

A fairly common and increasing resident, and probably scarce passage migrant. Probably much more frequent before persecution reduced its numbers. Well-established in Ashdown Forest and central West Sussex with occasional records from elsewhere. It feeds on small mammals, birds and carrion.

Convention on Migratory Species; Appendix 2; EC CITES Annex A

First Date	Last Date	No. of Records
21/05/1995	16/11/2013	57

Circus cyaneus**Hen Harrier****N**

This elegant bird of prey is a scarce winter visitor and passage migrant. Most records are from coastal farmland, marshes along the larger river valleys and on the Downs where it feeds on small birds and mammals.

Bird Population Status - red; Birds Directive Annex 1; Convention on Migratory Species; Appendix 2; EC CITES Annex A; Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; Wildlife and Countryside Act 1981 (Schedule 1 Part 1)

First Date	Last Date	No. of Records
19/01/1998	-	1

Milvus milvus**Red Kite**

This unmistakable large bird of prey is a very scarce breeding resident (first bred in 2004) and scarce but increasing visitor. Red kites were almost extinct in the UK by the early 1900s but in the last two decades, they have been re-introduced to England and Scotland, with magnificent results. It is easily recognised by its red colour and forked tail. It feeds on carrion, worms and small mammals.

Bird Population Status - amber; Birds Directive Annex 1; Convention on Migratory Species; Appendix 2; EC CITES Annex A; Wildlife and Countryside Act 1981 (Schedule 1 Part 1)

First Date	Last Date	No. of Records
18/09/2011	-	1

Falco columbarius**Merlin**

The Merlin is the UK's smallest bird of prey which has a fast, agile flight which it needs in order to catch small bird prey. It is a scarce winter visitor and passage migrant to Sussex where it is recorded mainly from coastal farmland and marshes. It is similar to a Kestrel, but has shorter broader wings, a square-cut tail and darker duller plumage.

Bern Convention Appendix 2; Bird Population Status - amber; Birds Directive Annex 1; Convention on Migratory Species; Appendix 2; EC CITES Annex A; Wildlife and Countryside Act 1981 (Schedule 1 Part 1)

First Date	Last Date	No. of Records
27/09/1990	-	1

Falco peregrinus**Peregrine**

Scarce breeding resident, usually nesting on cliffs. This large and powerful falcon is well-known for its propensity to roost on tall buildings and has been widely recorded in Sussex. Takes medium-sized birds, such as wading birds, pigeons and small ducks.

Bern Convention Appendix 2; Birds Directive Annex 1; Convention on Migratory Species; Appendix 2; EC CITES Annex A; Wildlife and Countryside Act 1981 (Schedule 1 Part 1)

First Date	Last Date	No. of Records
07/09/2011	05/10/2011	2

Falco subbuteo**Hobby**

Scarce breeding summer visitor and regular passage migrant. An agile species which feeds on insects and small birds, associated with heathlands that is now also found on farmland with pine clumps and woodland. Widely recorded in Sussex.

Bern Convention Appendix 2; Convention on Migratory Species; Appendix 2; EC CITES Annex A; Wildlife and Countryside Act 1981 (Schedule 1 Part 1)

First Date	Last Date	No. of Records
10/09/2001	-	4

Falco tinnunculus**Kestrel**

This well-known bird of prey is a fairly common resident and passage migrant, which can often be seen hovering over roadside verges, open country, parks and towns looking for small mammal prey. It is our commonest raptor and it is widespread in Sussex. The Kestrel has characteristic pointed wings, long tail and chestnut colour. They have been recently declining as a result of habitat degradation due to continuing intensive management of farmland.

Bern Convention Appendix 2; Bird Population Status - amber; Convention on Migratory Species; Appendix 2; EC CITES Annex A

First Date	Last Date	No. of Records
31/12/1976	08/07/2012	136

Phasianus colchicus**Pheasant**

A very common introduced resident only absent from places like the Pevensey Levels, probably because there is little cover. The population is augmented annually by shooting estates from captive bred stock. The male is unmistakable with its long tail-feathers and rich chestnut colour. Feeds on seeds, grain and shoots.

Birds Directive Annex 2.1

First Date	Last Date	No. of Records
31/12/1976	16/11/2013	15

Gallinula chloropus**Moorhen**

This ground-dwelling medium-sized bird is a very common resident, possibly fairly common winter visitor but status uncertain. It is found all year round in virtually all freshwater habitats across Sussex, where it feeds on water plants, seeds, fruit, grasses, insects, snails and worms. It is slate grey, brown and white with a striking red and yellow bill.

Birds Directive Annex 2.2; Convention on Migratory Species; Appendix 2

First Date	Last Date	No. of Records
28/05/1990	30/08/2011	2

Aegithalos caudatus**Long-tailed Tit**

This charming small bird is a very common resident found in woodland, farmland hedgerows, scrubland, parks and gardens. In winter they form flocks with other tit species. They are widespread across Sussex. It is easily recognised as it has a very long tail, and distinctive pink, white and black colouration. It feeds on insects and sometimes seed during the autumn and winter.

First Date	Last Date	No. of Records
31/12/1976	29/06/2013	26

Alauda arvensis**Skylark****BAP N**

In Sussex a fairly common resident, passage migrant and winter visitor. This lark has a brown back and white front and a small crest. Can be found in open countryside such as lowland farmland where it feeds on seeds and insects, and is recognised by its distinctive song flight which can last for many hours. A species of high conservation concern.

Bird Population Status - red; Birds Directive Annex 2.2; Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; UK Biodiversity Action Plan priority species)

First Date	Last Date	No. of Records
31/12/1976	23/10/2007	13

Lullula arborea**Woodlark****BAP N**

This species declined considerably in the mid- to late-20th century largely due to loss of heathland habitat and changes in agriculture. It is a scarce resident and a possibly very scarce passage migrant. This lark is brown on its back and white underneath and has a beautiful song which is often heard on heathlands at night. Its breeding strongholds in our area are in the west of West Sussex and on the Ashdown Forest, but it is gradually moving back to other areas. Feeds on insects and seeds.

Bird Population Status - amber; Birds Directive Annex 1; Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; UK Biodiversity Action Plan priority species; Wildlife and Countryside Act 1981 (Schedule 1 Part 1))

First Date	Last Date	No. of Records
11/07/1986	28/09/2013	348

Certhia familiaris**Treecreeper**

A small brown and white bird which is a common resident frequenting coniferous and deciduous woods, small copses, parks and gardens with mature trees. It can also be found in thick hedges in winter. It is widespread in woodland areas across Sussex. It moves like a mouse moving up tree trunks looking for insects and spiders.

Bern Convention Appendix 2

First Date	Last Date	No. of Records
31/12/1976	12/05/2013	27

Corvus corone agg.**Carrion Crow**

First Date	Last Date	No. of Records
27/07/1996	-	1

Corvus corone**Carrion Crow**

This all black crow is a very common resident found almost everywhere, from the centre of cities to heathland and from woodlands to the seashore, using trees, cliffs and buildings as nest sites. It feeds on carrion, insects, worms, seeds, fruit and any scraps. Recorded almost everywhere in Sussex.

Birds Directive Annex 2.2

First Date	Last Date	No. of Records
01/06/1995	16/11/2013	26

Corvus corone subsp. corone**Carrion Crow**

Birds Directive Annex 2.2

First Date	Last Date	No. of Records
31/12/1976	31/12/2000	15

Corvus frugilegus**Rook**

This large black crow with a prominent white beak is a very common resident of lowland farmland of open fields, especially grassland with tall trees close by where they build their nests. Nearly always found in gregarious flocks, and regularly with Jackdaws. Widespread in Sussex though less so in the north east Weald. The Rook feeds on worms, grain and insects.

Birds Directive Annex 2.2

First Date	Last Date	No. of Records
05/06/2008	21/05/2013	6

Corvus monedula**Jackdaw**

This small black and grey crow is a very common resident of woodland, parks and gardens with areas of grassland, often seen in pairs or small flocks. In towns it will nest in roofs and chimneys which simulate its more natural tree hole sites. In winter it spends time in stubble and ploughed fields and pasture, often in the company of Rooks. It feeds on insects, seeds and scraps.

Birds Directive Annex 2.2

First Date	Last Date	No. of Records
31/12/1976	12/05/2013	12

Garrulus glandarius**Jay**

The most colourful of the regions crow family, the Jay is a very common resident of broad-leaved and coniferous woodland. It has also moved into parks, cemeteries and gardens where there are mature trees. They are secretive birds that usually only make their presence known with a screaming call. Widespread across Sussex but absent or less frequent in the coastal plain. They feed on acorns, nuts, seeds and insects; burying some acorns for retrieval later on in the winter.

Birds Directive Annex 2.2

First Date	Last Date	No. of Records
31/12/1976	30/04/2013	40

Pica pica**Magpie**

This well-known black and white bird is a very common resident of woodland, farmland, parks and gardens - though they prefer grassland with thick hedges or scattered trees. Frequent in towns and widespread across Sussex. Often seen in small flocks; they are omnivorous scavengers.

Birds Directive Annex 2.2

First Date	Last Date	No. of Records
31/12/1976	16/11/2013	39

Emberiza citrinella**Yellowhammer****BAP N**

A strikingly yellow bunting that is a fairly common resident that favours open country such as farmland with hedgerows and bushes, heaths, commons and areas of scrubland. It feeds on insects and seed. It is widespread in Sussex but has suffered recent declines. Well known for their "a little bit of bread and no cheeeese" song.

Bern Convention Appendix 2; Bird Population Status - red; Environmental Stewardship Target Species (High Weald); Environmental Stewardship Target Species (Low Weald); Environmental Stewardship Target Species (Romney Marsh); Environmental Stewardship Target Species (South Downs); Environmental Stewardship Target Species (Wealden Greensand); Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; UK Biodiversity Action Plan priority species

First Date	Last Date	No. of Records
31/12/1976	29/06/2013	194

Emberiza schoeniclus**Reed Bunting****BAP N**

A black, white and brown bunting that is a fairly common resident, passage migrant and winter visitor typically found in wet vegetation but it has recently spread into farmland and, in winter, into gardens. It feeds on seeds and insects. It has suffered a serious population decline in recent years.

Bern Convention Appendix 2; Bird Population Status - amber; Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; UK Biodiversity Action Plan priority species

First Date	Last Date	No. of Records
31/12/1976	01/05/2007	23

Acanthis cabaret**Lesser Redpoll****BAP N**

This is a small brown streaked finch with a distinctive red forehead. It is a scarce breeder, fairly common passage migrant and winter visitor with most records from the east and north of Sussex. It can be seen in large flocks with Siskins feeding on seeds in Birch and Alder trees.

Bird Population Status - red; Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; UK Biodiversity Action Plan priority species

First Date	Last Date	No. of Records
22/06/1977	06/11/2012	9

Acanthis flammea**Common (Mealy) Redpoll**

This small finch is a scarce visitor to Sussex, mainly in autumn and winter. It is similar to the Lesser Redpoll with a red forehead, but larger and paler in appearance. It winters in areas with birch, alder and spruce trees where it can feed on small seeds from the trees and insects.

Bern Convention Appendix 2

First Date	Last Date	No. of Records
31/12/1976	31/12/1994	10

Carduelis carduelis**Goldfinch**

A colourful finch which is a probably fairly common resident, common summer visitor and passage migrant, and fairly common winter visitor. It likes trees and bushes with areas of tall weeds nearby and often breeds in parks, gardens, nurseries, orchards and churchyards as well as in the wider countryside. Its diet consists of insects and seeds, particularly thistle and teasel, and it is often seen in social flocks.

Bern Convention Appendix 2

First Date	Last Date	No. of Records
31/12/1976	16/11/2013	15

Carduelis chloris**Greenfinch**

This finch has distinctive green-yellow wing patches and is very common resident, and possibly fairly common passage migrant and scarce winter visitor. It can be found anywhere in Sussex with tall, fairly dense trees and plenty of seeds and insects. In winter it tends to feed in fields, gardens and along the seashore, often joining with flocks of other finches and buntings.

Bern Convention Appendix 2

First Date	Last Date	No. of Records
31/12/1976	30/04/2013	15

Chloris chloris**Greenfinch**

First Date	Last Date	No. of Records
01/05/2002	01/05/2005	2

Fringilla coelebs**Chaffinch**

This colourful finch is an abundant resident, and probably very common passage migrant and winter visitor. It is Britain's second commonest breeding bird favouring places with trees and bushes, including coniferous and deciduous woodland, farmland hedgerows, parks and rural and suburban gardens where it can feed on seeds and insects. It is recorded almost everywhere in Sussex.

First Date	Last Date	No. of Records
31/12/1976	16/11/2013	49

Fringilla montifringilla**Brambling**

This finch is a fairly common winter visitor and passage migrant of fields, woodland edges, beech woods, parks and gardens. It often forms large feeding flocks with other finches feeding on seeds.

Wildlife and Countryside Act 1981 (Schedule 1 Part 1)

First Date	Last Date	No. of Records
01/04/1994	31/12/1994	2

Linaria cannabina**Linnet****BAP N**

A small finch that declined rapidly, particularly in the 1970s and 1980s. Populations have subsequently been stable, but not increasing thought partly to do with the destruction of hedges which it requires for nesting sites. Widely recorded across East and West Sussex, often near the coast or on farmland where it feeds on seeds and insects.

Bern Convention Appendix 2; Bird Population Status - red; Nerc Act 2006; UK Biodiversity Action Plan priority species

First Date	Last Date	No. of Records
31/12/1976	01/06/2013	172

Loxia curvirostra**Common Crossbill**

A chunky finch with a large head and bill, it is a scarce visitor occurring in large numbers in particularly favourable years. Feeds almost exclusively on seeds in conifer woodlands. Breeds occasionally and can be seen flying in family groups or larger flocks.

Bern Convention Appendix 2; Wildlife and Countryside Act 1981 (Schedule 1 Part 1)

First Date	Last Date	No. of Records
25/07/1985	28/09/2013	60

Pyrrhula pyrrhula**Bullfinch****BAP N**

A fairly common and widespread resident species found in woodland, in orchards and on farmland, where it is closely associated with dense shrubs, scrub and untrimmed hedges. It is a stout finch which feeds on seeds, buds and insects (for its young). It has declined substantially in recent years mainly due to habitat changes.

Bird Population Status - amber; Nerc Act 2006; UK Biodiversity Action Plan priority species

First Date	Last Date	No. of Records
31/12/1976	22/07/2014	31

Spinus spinus**Siskin**

A yellow-green and black bird that is a common winter visitor, passage migrant and a very scarce breeder mainly in mature conifer woods close to heathlands. There are many coastal records and it is often seen feeding on alder seeds along rivers. There is an increasing tendency to visit peanut feeders in gardens.

Bern Convention Appendix 2

First Date	Last Date	No. of Records
31/12/1976	12/04/2012	86

Delichon urbicum**House Martin**

A distinctive hirundine with a forked tail and white rump, it is a common summer visitor and abundant passage migrant. It is more abundant in urban areas than in the countryside because of the availability of suitable nesting sites in the eaves of buildings, but it will feed on around insects that it finds on agricultural land and around water.

Bern Convention Appendix 2; Bird Population Status - amber

First Date	Last Date	No. of Records
31/12/1976	19/07/2012	8

Hirundo rustica**Swallow**

Our familiar swallow with long tail streamers is a common summer visitor and abundant passage migrant. They are agile in flight and spend most of their time on the wing hunting. They often breed in quiet farm buildings with nearby ponds and open pasture especially near cattle where they can feed on plentiful insects. Reedbeds are used as pre-migration roosts in late summer and early autumn.

Bern Convention Appendix 2; Bird Population Status - amber

First Date	Last Date	No. of Records
31/12/1976	19/07/2012	13

Riparia riparia**Sand Martin**

This small hirundine is a fairly common summer visitor and very common passage migrant, often seen in large gregarious flocks. The Sand Martin needs suitable sandy quarries or cliffs in which to excavate its nesting burrows and it therefore has a restricted distribution as a breeding species in Sussex. It is an agile flier and takes invertebrates in flight over water; it is often seen above rivers and water bodies such as gravel pits and reservoirs. On passage they roost in reedbeds.

Bern Convention Appendix 2; Bird Population Status - amber

First Date	Last Date	No. of Records
31/12/1976	14/07/2011	42

Lanius excubitor**Great Grey Shrike**

This medium-sized bird is a very scarce winter visitor and passage migrant with a handful of records in most years from both coastal and inland sites. It sits on prominent lookouts and is also known as the "butcher bird" as it sometimes impales its prey on long thorns or barbed wire. It feeds on small mammals and birds, lizards and insects. The Ashdown Forest is this species' Sussex stronghold.

Bern Convention Appendix 2

First Date	Last Date	No. of Records
31/12/1976	17/02/2001	7

Locustella naevia**Grasshopper Warbler****BAP N**

Very scarce and declining summer visitor and fairly common passage migrant which has a high, insect-like reeling song. Most recent records are from the Downs and the Rye Bay area, but it has been recorded right across our two counties. Nests are usually in lowland areas of damp rough grassland, scrub and fen and it feeds on insects.

Bird Population Status - red; Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec); UK Biodiversity Action Plan priority species

First Date	Last Date	No. of Records
31/12/1976	-	1

Anthus pratensis**Meadow Pipit**

This small brown, streaky bird is a common but declining resident, very common passage migrant and winter visitor; probably under recorded. It favours open country including farmland, flooded meadows, heathland and grassland where it can feed on spiders and insects such as flies, beetles and moths. Found widely in the southern half of the county and on Ashdown Forest, but rarely seen elsewhere in Sussex. They can often be seen in small flocks in the winter.

Bern Convention Appendix 2; Bird Population Status - amber

First Date	Last Date	No. of Records
31/12/1977	22/10/2011	53

Anthus trivialis**Tree Pipit****BAP N**

This pipit is a fairly common but local summer visitor and fairly common passage migrant, with most records coming from the Ashdown Forest area and from the heaths in West Sussex. It nests on the ground in open woodland, including young conifer plantations and heaths where there are suitable song-posts from which males can display. It feeds mainly on small invertebrates, and some plant matter, especially berries, in autumn. Numbers have seen a moderate decline in the past 25 years.

Bern Convention Appendix 2; Bird Population Status - red; Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; UK Biodiversity Action Plan priority species

First Date	Last Date	No. of Records
31/12/1976	29/06/2013	162

Motacilla alba**Pied Wagtail**

A common resident, passage migrant and winter visitor. Pied wagtails prefer habitats near water - river banks or lake edges with a stony or gravelly shore as well as moorland, farmland, coasts, estuaries, parks and gardens. Widespread across Sussex. *Motacilla alba yarrellii* is the main subspecies of the British Isles and is generally darker than the subspecies commoner in mainland Europe *Motacilla alba alba*. It feeds on insects and can be found in large roosts in urban areas during the winter.

Bern Convention Appendix 2

First Date	Last Date	No. of Records
31/12/1976	24/11/2011	3

Motacilla alba subsp. yarrellii**Pied Wagtail**

Bern Convention Appendix 2

First Date	Last Date	No. of Records
16/11/2013	-	1

Motacilla cinerea**Grey Wagtail**

This small grey and yellow bird is a fairly common resident, passage migrant and winter visitor. This species has gradually increased its range in the past 150 years and has expanded into the English lowlands from the northern and western uplands. It has suffered recent moderate declines. It can be found on flowing freshwater, nesting on bridge supports and other constructions, and also at sewage farms, farmyards, lakes and canals where they can catch insects to feed on.

Bern Convention Appendix 2; Bird Population Status - amber

First Date	Last Date	No. of Records
24/01/2001	28/06/2010	3

Erithacus rubecula**Robin**

The quintessential British bird, the Robin "redbreast" is an abundant and well-known resident, probably common passage migrant, mainly in autumn. Its status as a winter visitor is uncertain. It favours woodlands, parks and gardens with plenty of undergrowth where it can find worms and seeds, fruits and insects.

Bern Convention Appendix 2

First Date	Last Date	No. of Records
31/12/1976	16/11/2013	47

Ficedula hypoleuca**Pied Flycatcher**

Scarce passage migrant; more numerous in autumn than spring. Has bred. Often recorded in some numbers near the coast in woods and copses during autumn migrations. It feeds on insects and caterpillars; fruit and seeds in late summer and on migration.

Bird Population Status - amber; Convention on Migratory Species; Appendix 2

First Date	Last Date	No. of Records
15/08/2003	26/08/2003	2

Luscinia megarhynchos**Nightingale**

This rufous-coloured bird is slightly larger than a robin and is a fairly common summer visitor and infrequently seen passage migrant. Nightingales feed on insects and like dense thickets and scrub with thick foliage or nesting in; the edges of clearings or rides, or clumps of bushes surrounded by heath or open space, are ideal. This secretive bird is more often heard than seen; they have an unmistakable loud, rich and mellow song often heard at night.

Bern Convention Appendix 2; Bird Population Status - amber

First Date	Last Date	No. of Records
01/06/1980	29/06/2013	6

Muscicapa striata**Spotted Flycatcher****BAP N**

A fairly common but declining summer visitor, which is a scarce passage migrant in spring and fairly common in the autumn. It prefers open woodland with ample clearings and prominent perches, but can adapt well to gardens and parks which provide similar feeding opportunities. It feeds on insects, which it catches by flying from a perch. This species has suffered recent dramatic population declines.

Bern Convention Appendix 2; Bird Population Status - red; Convention on Migratory Species; Appendix 2; Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec); UK Biodiversity Action Plan priority species

First Date	Last Date	No. of Records
31/12/1988	25/07/2012	12

Phoenicurus phoenicurus**Redstart**

This robin-sized bird is a scarce and declining summer visitor and fairly common passage migrant. Recorded mainly from its preferred habitat of old parkland with scattered trees where it feeds mainly on insects but also spiders, worms and berries. Males regularly flick their bright red tails. Mostly found in the centre and north of our area.

Bern Convention Appendix 2; Bird Population Status - amber

First Date	Last Date	No. of Records
31/12/1976	01/06/2013	5

Saxicola rubicola**Stonechat**

A robin-sized bird which is a fairly common resident and partial migrant. It shows a marked preference for heathland with scattered clumps of gorse as well as some downland plantations, where you can hear its loud "tacc tacc" call like two stones being tapped together. Widespread in our area. Feeds on invertebrates, seeds and fruit (e.g. blackberries).

Bern Convention Appendix 2

First Date	Last Date	No. of Records
31/12/1976	01/06/2013	296

Turdus iliacus**Redwing**

The smallest of the region's thrushes with conspicuous red flanks, it is a very common, occasionally very common, passage migrant and winter visitor. It is often seen in the wider countryside and sometimes visits parks and gardens, especially in cold, snowy weather. They feed in fields and hedgerows on berries and worms. Sometimes seen in flocks with Fieldfares.

Bird Population Status - red; Birds Directive Annex 2.2; Wildlife and Countryside Act 1981 (Schedule 1 Part 1)

First Date	Last Date	No. of Records
31/12/1976	16/11/2013	14

Turdus merula**Blackbird**

An abundant breeding resident, very common or abundant winter visitor but its status as a passage migrant is unknown. One of the commonest and well-known British birds of woodland, farmland, gardens and parks where they like areas with bushes, shrubs and trees and nearby open ground with short grass where they can feed on insects, worms and berries.

Birds Directive Annex 2.2

First Date	Last Date	No. of Records
31/12/1976	16/11/2013	46

Turdus philomelos**Song Thrush****BAP N**

A very common but decreasing resident and partial migrant; common passage migrant and winter visitor. A species which is declining throughout the UK with an estimated reduction of 73% in farmland and 49% in woodland habitats. Still widespread in Sussex. It has a spotted breast and a repetitive song and feeds on worms, snails and fruits.

Bird Population Status - red; Birds Directive Annex 2.2; Nerc Act 2006; UK Biodiversity Action Plan priority species

First Date	Last Date	No. of Records
31/12/1976	21/05/2013	41

Turdus pilaris**Fieldfare**

This large, colourful thrush is a common, occasionally very common, passage migrant and winter visitor usually seen in flocks of anything from a dozen or two to several hundred. They feed on insects, worms and berries and can be seen in open countryside with grass fields, and berry-bearing hedgerows, especially hawthorn. Also frequent visitors to orchards, gardens and parks especially ones with apple trees. They will come into towns and feed in parks and on playing fields too.

Bird Population Status - red; Birds Directive Annex 2.2; Wildlife and Countryside Act 1981 (Schedule 1 Part 1)

First Date	Last Date	No. of Records
31/12/1976	16/11/2013	13

Turdus viscivorus**Mistle Thrush**

This large thrush is a common resident and partial migrant of open woodland, gardens and parkland. It is widespread across Sussex. It feeds on slugs, worms, berries and insects, and will aggressively defend its favourite food source such as a berry tree.

Bird Population Status - amber; Birds Directive Annex 2.2

First Date	Last Date	No. of Records
31/12/1976	14/11/2012	34

Cyanistes caeruleus**Blue Tit**

This colourful small bird is an abundant resident found mainly in deciduous woodland. It has adapted to gardens with mature trees or nestboxes and is also found in parkland, hedgerows and conifers. Recorded almost everywhere in Sussex. It feeds on insects, caterpillars, seeds and nuts, and is a regular visitor to garden birdfeeders.

Bern Convention Appendix 2

First Date	Last Date	No. of Records
31/12/1976	16/11/2013	45

Parus major**Great Tit**

This is the UK's largest tit, and is an abundant resident. It is a woodland bird which has readily adapted to man-made habitats and is a familiar garden visitor. It feeds on insects, seeds and nuts and will readily visit garden birdfeeders and use nestboxes. It can also be found along hedgerows and in parks and coniferous woodland. Recorded almost everywhere in Sussex.

Bern Convention Appendix 2

First Date	Last Date	No. of Records
31/12/1976	16/11/2013	45

Periparus ater**Coal Tit**

A small bird that is a very common resident that favours woodland, especially conifer woods, parks and gardens. It feeds on insects, seeds and nuts and is a regular visitor to peanut feeders in gardens. It is widespread in Sussex. In winter it joins with other tits to form feeding flocks.

Bern Convention Appendix 2

First Date	Last Date	No. of Records
31/12/1976	08/02/2013	45

Poecile montana**Willow Tit****BAP N**

A very scarce and declining resident that favours damp woodland close to rivers, streams and gravel pits. It also likes undergrowth in broadleaved woodland and is sometimes found well away from water in marginal habitat not so suitable for other Tit species. This species has suffered recent population declines. It has a large sooty-black cap extending to the back of the neck and a small untidy black bib; it feeds on insects, seeds and berries.

Bern Convention Appendix 2; Bird Population Status - red; Nerc Act 2006; UK Biodiversity Action Plan priority species

First Date	Last Date	No. of Records
24/02/1983	28/06/1995	2

Poecile palustris**Marsh Tit****BAP N**

A smart looking bird with a black bib and glossy black cap. It is a scarce resident preferring woodland areas, normally away from the coast. Also found in orchards, mature gardens and parkland. It feeds on insects and seeds. It has seen recent population declines.

Bern Convention Appendix 2; Bird Population Status - red; Nerc Act 2006; UK Biodiversity Action Plan priority species

First Date	Last Date	No. of Records
31/12/1976	19/07/2012	28

Passer domesticus**House Sparrow****BAP N**

This well-known noisy and gregarious bird is a very common, but possibly declining resident, recorded almost everywhere in Sussex. Found both in urban areas and the countryside, it normally feeds and breeds near people. It feeds on seeds and scraps. Although vanishing from the centre of many cities, it is not uncommon in most towns and villages, though it is declining. This has earned it a place on the Red List of species of conservation concern.

Bird Population Status - red; Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; UK Biodiversity Action Plan priority species)

First Date	Last Date	No. of Records
31/12/1976	-	1

Passer montanus**Tree Sparrow****BAP N**

A bird that has had large fluctuations in population in the past but which has been in decline in the British Isles for some time. In Sussex it is a much declined and now very scarce resident, and a scarce passage migrant and winter visitor, more abundant in East Sussex than in the West. It is mainly a bird of open farmland with hedgerows and free-standing trees where it feeds on insects and seeds.

Bird Population Status - red; Environmental Stewardship Target Species (High Weald); Environmental Stewardship Target Species (Low Weald); Environmental Stewardship Target Species (Pevensey Levels); Environmental Stewardship Target Species (Romney Marsh); Environmental Stewardship Target Species (South Downs); Environmental Stewardship Target Species (Wealden Greensand); Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; UK Biodiversity Action Plan priority species)

First Date	Last Date	No. of Records
11/02/1986	05/10/1986	2

Phylloscopus collybita**Chiffchaff**

A very common summer visitor and passage migrant, with small numbers wintering, this is a well-known bird which is named after its call. This small olive-brown warbler favours deciduous and mixed woodland, stands of trees, parks and mature gardens where there is thick undergrowth. It feeds on insects and is widespread across Sussex.

First Date	Last Date	No. of Records
16/06/1985	29/06/2013	39

Phylloscopus sibilatrix**Wood Warbler****BAP N**

A very scarce summer resident and passage migrant. This large white and yellow leaf warbler is associated with damp oak woodland where it feeds mainly on insects and spiders. Its best locations are in the north of our area, although it has never been common in Sussex and seems to be declining.

Bird Population Status - red; Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; UK Biodiversity Action Plan priority species)

First Date	Last Date	No. of Records
15/06/1996	22/05/2011	5

Phylloscopus trochilus**Willow Warbler**

This small grey-green and yellow warbler is a fairly common summer visitor and passage migrant. It favours deciduous woodland and scrub where it can feed on a wide variety of small insects and spiders, and fruit and berries in the autumn. Their population, especially in southern Britain, has undergone a moderate decline over the past 25 years.

Bird Population Status - amber

First Date	Last Date	No. of Records
31/12/1976	21/05/2013	45

Prunella modularis**Dunnock****BAP N**

A very common resident, the Dunnock needs areas with thick vegetation - thickets, brambles, hedges, woodland edges. Readily uses man-made habitats like parks, gardens and churchyards. It is inclined to suffer in hard winters. This grey and brown bird is quite shy and inconspicuous, and creeps about on the ground in the undergrowth, looking for insects, spiders, worms and seeds.

Bern Convention Appendix 2; Bird Population Status - amber; Nerc Act 2006; UK Biodiversity Action Plan priority species

First Date	Last Date	No. of Records
31/12/1976	16/11/2013	34

Regulus ignicapilla**Firecrest**

A scarce or possibly fairly common breeding resident, passage migrant and winter visitor. A bird that shows a preference for the edges of mature spruce plantations where it feeds on insects and spiders. This tiny beautiful bird is recorded from only a few scattered locations in our area.

Bern Convention Appendix 2; Bird Population Status - amber; Wildlife and Countryside Act 1981 (Schedule 1 Part 1)

First Date	Last Date	No. of Records
21/09/2013	-	1

Regulus regulus**Goldcrest**

The Goldcrest is the UK's smallest songbird and is a very common breeding resident, common passage migrant and winter visitor. It is predominantly a bird of coniferous forests and may also take up residence in deciduous woodland, suburban parks and large gardens where there are conifers nearby. They feed on insects and can often be found in tit flocks. Inclined to suffer in hard winters.

Bern Convention Appendix 2

First Date	Last Date	No. of Records
31/12/1976	16/11/2013	41

Sitta europaea**Nuthatch**

A small plump colourful bird which is a common resident of mature deciduous woods, especially large oakwoods, wooded parks and gardens. It is widespread across Sussex except on the coastal plain. It feeds on a varied diet of insects, hazel nuts, acorns, beechmast and other nuts and seed.

Bern Convention Appendix 2

First Date	Last Date	No. of Records
31/12/1976	12/05/2013	25

Sturnus vulgaris**Starling****BAP N**

This beautiful glossy black bird is a common but declining resident, and very common to abundant winter visitor. It favours open woodland and woodland edges, hedgerows, parks and gardens and winters in arable fields, pasture, gardens, parks and on the seashore. It feeds on insects and fruit. Large noisy feeding flocks can collect into even larger roosting flocks. Still one of the commonest of garden birds, its decline elsewhere makes it a Red List species of conservation concern.

Bird Population Status - red; Birds Directive Annex 2.2; Nerc Act 2006; UK Biodiversity Action Plan priority species

First Date	Last Date	No. of Records
31/12/1976	-	1

Sylvia atricapilla**Blackcap**

A very common summer visitor and passage migrant, and a scarce winter visitor. Males have a black cap and females and juveniles a red brown cap on otherwise grey plumage. Although primarily a summer visitor birds from Germany and north-east Europe are increasingly spending the winter in the UK. It favours woodland with tall trees and undergrowth as well as parks and mature gardens, where it can feed on insects and berries.

First Date	Last Date	No. of Records
16/06/1985	29/06/2013	38

Sylvia borin**Garden Warbler**

A common summer visitor and passage migrant it has very dull brown non-descript plumage as it's Latin name suggests. Despite its name it is not normally a garden bird, preferring deciduous and mixed woodland and woodland edges, with glades, rides and other open areas where it can feed on insects and berries. Widespread in wooded areas and less frequent on the Downs and coastal plain.

First Date	Last Date	No. of Records
31/12/1988	12/05/2013	31

Sylvia communis**Whitethroat**

A medium-sized warbler which is a very common summer visitor and passage migrant. Favours open areas including hedges, scrub, coastal clifftops and young deciduous woods and woodland edges. Widespread across Sussex, avoiding urban areas. It feeds on insects, and berries and fruit in the autumn.

Bird Population Status - amber

First Date	Last Date	No. of Records
31/12/1976	01/06/2013	31

Sylvia undata**Dartford Warbler**

One of Britain's few resident warblers and a fairly common but localised bird breeding almost exclusively on heathland. Vulnerable to cold winters and the destruction of gorse scrub. This small, dark, long-tailed warbler has a scratchy warbling song and feeds on insects and spiders that it gleans from gorse.

Bird Population Status - amber; Birds Directive Annex 1; Wildlife and Countryside Act 1981 (Schedule 1 Part 1)

First Date	Last Date	No. of Records
31/12/1988	01/06/2013	299

Troglodytes troglodytes**Wren**

This tiny red-brown bird is an abundant resident, breeding in Sussex wherever there is available cover, particularly in dense undergrowth. It is found in most habitats ranging from gardens to woodland and orchards to hedgerows. Often seen moving about like a mouse looking for insect and spider prey. It can decline significantly after hard winters, especially in more exposed places. It has a beautiful loud trilling song.

Bern Convention Appendix 2

First Date	Last Date	No. of Records
31/12/1976	16/11/2013	48

Phalacrocorax carbo**Cormorant**

An increasing breeding species and common winter visitor on the coast, often now breeding some distance inland. If numbers are large, they can be a cause of concern among fisherman as they are fish-eating birds with a healthy appetite. Any queries relating to cormorants should be addressed initially to the Sussex Ornithological Society.

First Date	Last Date	No. of Records
06/11/1999	28/09/2003	2

Dendrocopos major**Great Spotted Woodpecker**

A striking red, black and white medium-sized bird which is a common resident especially near large trees with suitable holes for nesting, especially in woodland and parkland. Often recorded from suburban gardens where it feeds at peanut feeders and bird tables. It also feeds on insects, seeds and nuts. It tends to be rarely recorded from much of the coastal plain. Its presence is often announced by its loud call or by its distinctive spring 'drumming' display.

Bern Convention Appendix 2

First Date	Last Date	No. of Records
31/12/1976	16/11/2013	81

Dendrocopos minor**Lesser Spotted Woodpecker****BAP N**

The size of a sparrow, this is Europe's smallest woodpecker. It is a scarce, possibly now very scarce, and declining Sussex resident that favours damp, open, broad leaved woodland. It feeds on insects, especially larvae, spiders and wood-boring insects. It requires decaying wood in which it makes a new nest chamber each year. Its population is scattered across Sussex in suitable areas; the county holds a significant proportion of the national population.

Bern Convention Appendix 2; Bird Population Status - red; Nerc Act 2006; UK Biodiversity Action Plan priority species

First Date	Last Date	No. of Records
17/12/1982	21/06/1998	6

Picus viridis**Green Woodpecker**

This is the largest of the three resident British woodpeckers and is fairly common or common; its presence is usually announced by its laughing "yaffle" call. This striking green woodpecker has a red crown stripe and requires mature trees for nesting and open areas for feeding, such as orchards, parks and farmland where it can feed on insects, especially ants; however most records are from wooded areas. Numbers can fall in hard winters and recovery is slow.

Bern Convention Appendix 2; Bird Population Status - amber

First Date	Last Date	No. of Records
31/12/1976	01/06/2013	70

Podiceps cristatus**Great Crested Grebe**

A fairly common resident; passage migrant and winter visitor when large flocks can develop on coastal waters. This species was once killed for its breast and head feathers, and came close to extinction. The creation of gravel pits is thought to have helped the bird and it breeds on large areas of fresh water. It feeds mainly on fish.

First Date	Last Date	No. of Records
12/06/1997	20/06/2004	2

Tachybaptus ruficollis**Little Grebe**

Our smallest grebe and a species that breeds in a wide range of wetlands, some very small. It is a scarce resident in Sussex, passage migrant and winter visitor when flocks of 20 plus individuals can develop, although it is rarely seen on the sea. This species feeds on insects and larvae and is dependant on suitable water levels for successful breeding.

Bird Population Status - amber

First Date	Last Date	No. of Records
02/05/1984	-	1

Caprimulgus europaeus**Nightjar****BAP N**

This brown hawk-like bird is recorded as a breeding species from many commons, heaths and open woods across both East and West Sussex but is a declining species due mainly to habitat loss, afforestation and fragmentation. This nocturnal species feeds on insects and moths and its churring song is an evocative sound of the summer. It is a fairly common but localised summer visitor which is rarely seen on migration.

Bern Convention Appendix 2; Bird Population Status - red; Birds Directive Annex 1; Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; UK Biodiversity Action Plan priority species

First Date	Last Date	No. of Records
31/12/1976	01/06/2013	140

Athene noctua**Little Owl**

This is the UK's smallest owl and is a fairly common resident in Sussex. It is not a British native but was introduced at various times from the mid-19th century, including to the Knepp Estate in West Sussex. Now well established and widespread in the two counties. It can be found around agricultural land, trees, copses, hedges, parkland and orchards where it can feed on small mammals and birds, beetles and worms. It nests in farm buildings and in nestholes in trees and it is often seen in the day time perched on tree branches.

Bern Convention Appendix 2; EC CITES Annex A

First Date	Last Date	No. of Records
31/12/1976	29/11/1982	2

Strix aluco**Tawny Owl**

This is the UK's most abundant owl and is a fairly common or common resident in Sussex, particularly in the more wooded areas. Found in deciduous and coniferous woodland, and also farmland, parks and churchyards, it is scarce or absent from more treeless areas near the coast. It is more often heard than seen, recognised by its characteristic hooting. It feeds on a varied diet of small mammals, small birds, frogs, fish, insects and worms.

Bern Convention Appendix 2; EC CITES Annex A

First Date	Last Date	No. of Records
31/12/1976	21/05/2013	18

BIODIVERSITY ACTION PLAN SPECIES INVENTORY

The BAP Species Inventory does not include bat, bird or otter records.

Bat and bird records are included in separate inventories, while otter records are not included in SxBRC reports.

The UK Biodiversity Action Plan (BAP), published in 1994, was the UK Government's response to signing the Convention on Biological Diversity (CBD) at the 1992 Rio Earth Summit. The new **UK post-2010 Biodiversity Framework** replaces the previous UK level BAP, though the lists of priority species agreed under the UK BAP still form the basis of much biodiversity work in the UK. The current strategy for England is '**Biodiversity 2020: A Strategy for England's wildlife and ecosystem services**'. Although the UK BAP has been succeeded, Species Action Plans (SAPs) developed under the UK BAP still remain important and valuable reference sources for background information on Priority Species under the UK Post-2010 Biodiversity Framework.

The new framework includes five internationally agreed strategic goals and supporting targets to be achieved by 2020. The five strategic goals agreed were:

- **Strategic Goal A:** Address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society
- **Strategic Goal B:** Reduce the direct pressures on biodiversity and promote sustainable use
- **Strategic Goal C:** To improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity
- **Strategic Goal D:** Enhance the benefits to all from biodiversity and ecosystem services
- **Strategic Goal E:** Enhance implementation through participatory planning, knowledge management and capacity building.

Further information on the UK BAP and details of the species and habitat action plans can be found on the [JNCC website](#).

BAP species within this report

- BAP records are labelled so that only one record per species per grid reference is included in a SxBRC report. This will usually be the most up to date record.
- Species which appear in the 'England Biodiversity List' to meet the requirements of Section 41 of the NERC Act (2006)* are labelled with the symbol **N**.

* Natural Environment & Rural Communities (NERC) Act

The NERC Act (2006) was established with the intention to help ensure that biodiversity becomes an integral consideration in the development of policies, and that decisions of public bodies work with nature and not against it.

The England Biodiversity List has been drawn up to meet the requirements of Section 41 of the Act. The S41 list consists of **943 species** and **56 habitats** of principal importance in England and will be used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under Section 40 of the NERC Act.

Further details of the NERC Act can be found on the [Natural England website](#).

UK BIODIVERSITY ACTION PLAN SPECIES INVENTORY REPORT

Please note that bat, bird and otter records are not included in this report

Land at public footpath 907, Minsted

22 June 2015 ESD/15/441 Search Area: SU8521

Alec Fry (Minsted Residents Group)

Asilus crabroniformis

Hornet Robberfly

N

Insect - true fly (Diptera)

A large black and yellow robber fly of heaths and pastures. A declining species, commoner in the west. Recorded mainly from then West Sussex downs but also known from East Sussex. 1972-2001.

Designations

Nationally Notable, Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, Sussex Rare Species Inventory, UK Biodiversity Action Plan priority species

Grid Reference	Recorder	Date	Locality
SU85122188	Graeme Lyons;Shaun Pryor	01/08/2013	Iping Common SWT Reserve
SU8563221963	Graeme Lyons	08/09/2008	Stedham & Iping Common SWT Reserve

Thyridanthrax fenestratus

Mottled Bee-fly

N

Insect - true fly (Diptera)

A strikingly marked bee fly of sandy heaths in southern England. Widely recorded from suitable heathland habitats in West Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, Sussex Rare Species Inventory, UK Biodiversity Action Plan priority species

Grid Reference	Recorder	Date	Locality
SU850218	Mike Edwards;Peter Hodge	15/06/2003 - 07/09/2003	Trotton and Iping Common, West Sussex (VC13)
SU85052184	Graeme Lyons;Andy Phillips	04/05/2010	Iping Common SWT Reserve
SU8521	Graeme Lyons;Kevin Lerwill	28/06/2010	Iping and Stedham Commons

Arctia caja

Garden Tiger

N

Insect - moth

A dramatically coloured large moth with woolly bear larvae that eat a wide variety of plants. Widespread across Sussex, though often absent from some areas.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species

Grid Reference	Recorder	Date	Locality
SU856219	John Radford;Rosemary Radford	1975 - 1995	Stedham and Iping Commons SSSI

Spilosoma lubricipeda

White Ermine

N

Insect - moth

A white moth with black speckles. Flies in the summer months and 'woolly bear' larvae feed on low-growing plants. Widespread across Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	08/06/2007	Fitzhall Lodgelping
SU855218	Robin Storkey	19/06/2005	Stedham Common
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI

Spilosoma luteum

Buff Ermine

N

Insect - moth

A yellowish-buff summer-flying moth normally with black speckles. Larvae feed on low-growing plants as well as trees and shrubs. Widespread and often common in Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	15/08/2007	Fitzhall Lodgelping
SU851218	Dave Green;Tony Davis;Penny Green	10/06/2014	Iping Common SWT Reserve
SU8521	Andrew King	25/06/2013	Iping Common
SU855218	Robin Storkey & Mike Perry	19/07/2004	Stedham Common
SU856218	Caroline Hallam	August 1982	Stedham Common
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI
SU85652174	Robin Storkey	13/07/2003	Stedham Common

Tyria jacobaeae

Cinnabar

N

Insect - moth

A red and black day-flying moth whose orange and black ringed larvae feed on ragwort and related plants. Common across Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	06/09/2007	Fitzhall Lodgelping
SU851218	Dave Green;Tony Davis;Penny Green	10/06/2014	Iping Common SWT Reserve
SU856218	Mike Edwards	1988	Stedham Common
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI

Cymatophorima diluta

Oak Lutestring

N

Insect - moth

A moth of mature woodland, the larva feeding on oak. Southern England, Midlands and Wales, less frequent in northern England and southern Scotland. Scattered but rather infrequent records across East and West Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU855218	Kay Bridger;Mike Bridger;Robin	12/09/2007	Stedham Common

Watsonalla binaria

Oak Hook-tip

N

Insect - moth

A widespread moth of woods and parks, though said to be rapidly declining. Relatively common in Sussex, but numbers are inclined to fluctuate.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	21/09/2007	Fitzhall Lodgelping
SU855218	Kay Bridger;Mike Bridger;Isobel Perry;Mike Perry;Robin Storkey	31/08/2005	Stedham Common
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI
SU85652174	Robin Storkey	13/07/2003	Stedham Common

Paracolax tristalis

Clay Fan-foot

N

Insect - moth

A nationally scarce (a) species that is contracting its range and now only occurs in a few woods in Kent, Sussex and Surrey. In Sussex it is widespread in the Wealden woods of East Sussex but only occurs in the far north west of West Sussex. Caterpillars feed on Oak and other trees.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, Sussex Rare Species Inventory, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Anon @ Chichester NHS	11/04/2006 - 24/12/2006	Fitzhall Lodgelping
SU855218	Robin Storkey & Mike Perry	31/07/2004	Stedham Common

Ecliptopera silaceata

Small Phoenix

N

Insect - moth

A common moth in England and Wales and, though widespread in Scotland, it is less common there. It lives in a variety of habitats including open woodland, downland, commons, gardens and waste ground. Generally common in Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU855219	A. Bradshaw;Julian Clarke	31/07/2004	Stedham Common, Midhurst, West Sussex (VC13)
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI

Ennomos fuscantaria

Dusky Thorn

N

Insect - moth

A moth of woods and parks flying from late July to October. Larvae live on ash (*Fraxinus excelsior*). Scattered across Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	21/09/2007	Fitzhall Lodgelping
SU855218	Kay Bridger;Mike Bridger;Isobel Perry;Mike Perry;Robin Storkey	31/08/2005	Stedham Common

Ennomos quercinaria

August Thorn

N

Insect - moth

A moth that flies in August and September in woods gardens and parkland. The larvae feed on a variety of trees. Recorded widely, but infrequently across Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Anon @ Chichester NHS	11/04/2006 - 24/12/2006	Fitzhall Lodgelping

Hemistola chrysoprasaria

Small Emerald

N

Insect - moth

A moth of downland, hedgerows and edges of woods, mainly found on chalk. Larva on Clematis. Widely distributed in the southern half of Britain, less frequent from the Midlands northwards to Lincolnshire and Westmorland. Widespread in Sussex, mainly from the coast and the Downs.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI

Lycia hirtaria

Brindled Beauty

N

Insect - moth

A March and April flying moth of woods and gardens. The female has very reduced wings and is unable to fly. Larvae on a wide range of trees and shrubs. Scattered records across Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	20/05/2007	Fitzhall Lodgelping
SU855218	Robin Storkey & Mike Perry	24/04/2004	Stedham Common

Melanthia procellata

Pretty Chalk Carpet

N

Insect - moth

Hedgerows, edges of woods and bushy places on calcareous soils. Larva on Clematis. Southern England ranging northwards to Lincolnshire and Caernarvonshire. In our area mainly recorded from the West Sussex Downs.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI

Timandra comae

Blood-Vein

N

Insect - moth

A widespread and moderately common moth in southern Britain with records from across Sussex. It is regarded as being in rapid decline.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	21/09/2007	Fitzhall Lodgelping
SU855218	Robin Storkey & Mike Perry	15/06/2004	Stedham Common

Xanthorhoe ferrugata

Dark-barred Twin-spot Carpet

N

Insect - moth

A widespread species in Sussex commoner in some years than in others. Found in gardens, scrubland and often on the coast. The larvae feed on a variety of low growing plants. This species is declining generally across the country as a whole.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU8521	Sarah Patton	16/08/2003	Stedham Common

Malacosoma neustria

Lackey

N

Insect - moth

The larvae of this moth feed on a variety of trees and shrubs, living in a communal tent. Distributed throughout the southern half of England becoming very local further north. The species is vulnerable to flail cutting of hedges in winter and may be declining.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Anon @ Chichester NHS	11/04/2006 - 24/12/2006	Fitzhall Lodgelping
SU856218	E C M Haes	January 1984 - July 1985	Stedham Common

Plebejus argus

Silver-studded Blue

N

Insect - butterfly

Now almost confined in Sussex to Ashdown Forest and a few West Sussex heaths. The larvae of this nominate subspecies live on heather (*Calluna*).

Designations

IUCN (2001) - Vulnerable, Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, Sussex Rare Species Inventory, UK Biodiversity Action Plan priority species, Wildlife and Countryside Act 1981 (Schedule 5 Section 9.5a), Wildlife and Countryside Act 1981 (Schedule 5 Section 9.5b)

Grid Reference	Recorder	Date	Locality
SU850218	Neil Hulme	16/06/2009	Iping Common, West Sussex (VC13)
SU851218	Paul Callaway	20/06/2004	Iping Common
SU8521	Colin Knight	29/06/2013	Iping and Stedham Commons
SU852217	Sophie-May Lewis	23/06/2012	Stedham Common
SU853219	Peter Gay;Joyce Gay	06/07/2003	Stedham Common, Midhurst
SU854217	Peter Atkinson	08/07/2005	Stedham
SU855217	Robin Crane	15/06/1997	Stedham Common SWT Reserve, Stedham & Iping Common SWT Reserve
SU855218	Neil Hulme	28/06/2013	Stedham Common
SU855219	Sue Berrisford	27/06/2006	Stedham Common
SU856218	Peter Atkinson	11/07/2006	Stedham Common
SU8565621753	Graeme Lyons	29/05/2009	Stedham & Iping Common SWT Reserve
SU857217	B. Taylor	27/06/2008	Stedham Common
SU857218	Alice Parfitt	24/06/2006	Stedham Common
SU857219	Andrew Guest	10/07/2004	Iping & Stedham Commons
SU858218	B. Taylor	28/06/2007	Stedham Common

Plebejus argus subsp. cretaceus

Silver-studded Blue

N

Insect - butterfly

Last recorded in Sussex around 1940. Once widespread on the Downs. A 1988 record from Stedham Common requires confirmation.

Designations

IUCN (2001) - Vulnerable, Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, Sussex Rare Species Inventory, UK Biodiversity Action Plan priority species, Wildlife and Countryside Act 1981 (Schedule 5 Section 9.5a), Wildlife and Countryside Act 1981 (Schedule 5 Section 9.5b)

Grid Reference	Recorder	Date	Locality
SU856218	Mike Edwards	1988	Stedham Common

Acronicta psi

Grey Dagger

N

Insect - moth

A widespread species over much of the southern half of the British Isles frequenting woods and gardens but now suffering a marked decline. Widely recorded in Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU855219	A. Bradshaw;Julian Clarke	31/07/2004	Stedham Common, Midhurst, West Sussex (VC13)

Acronicta rumicis

Knot Grass

N

Insect - moth

A widely distributed moth in the southern half of the British Isles, but one that is marked decline. Widely recorded in Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	23/04/2007	Fitzhall Lodgelping
SU8521	Sarah Patton	31/07/2004	Stedham Common
SU85462187	Graeme Lyons;Andy Phillips;Chris Bentley;Evan Jones	28/09/2013	Stedham Common SWT Reserve
SU855218	Robin Storkey & Mike Perry	19/07/2004	Stedham Common
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI

Allophyes oxyacanthae

Green-brindled Crescent

N

Insect - moth

An autumn-flying noctuid moth with a metallic sheen. Frequents woodlands, hedgerows and gardens. Larvae on a variety of trees and bushes. Widespread in Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	02/11/2007	Fitzhall Lodgelping

Amphipoea oculea

Ear Moth

N

Insect - moth

A widespread moth in the British Isles that prefers marshy and damp places. It is in marked decline. Widely recorded in Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	08/08/2007	Fitzhall Lodgelping

Amphipyra tragopoginis

Mouse Moth

N

Insect - moth

A widespread moth in the British Isles, but one that is in marked decline. Very widely recorded in Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Anon @ Chichester NHS	11/04/2006 - 24/12/2006	Fitzhall Lodgelping
SU855218	Robin Storkey & Mike Perry	30/08/2004	Stedham Common
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI

Apamea remissa

Dusky Brocade

N

Insect - moth

A generally distributed moth of open woodland, marshes, downland, commons and other grassy places that is in marked decline. Larvae live on grasses. Widely recorded in Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	02/09/2007	Fitzhall Lodgelping

Asteroscopus sphinx

Sprawler

N

Insect - moth

A greyish woodland noctuid on the wing from October to December. The name comes from the habit of the tree-feeding larva of throwing its head back when disturbed. Recorded from only a few locations in our area both in East and West Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	26/11/2007	Fitzhall Lodgelping

Atethmia centrago

Centre-barred Sallow

N

Insect - moth

An orange and brown noctuid moth of woodlands and hedgerows on the wing in late summer and early autumn. Larvae feed on ash. Widespread in Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	21/09/2007	Fitzhall Lodgelping
SU855218	Robin Storkey & Mike Perry	15/09/2004	Stedham Common
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI

Brachylomia viminalis

Minor Shoulder-knot

N

Insect - moth

A greyish, rather variable noctuid moth of damp woodlands flying in July and August, heath and fen. The larvae feed on willows. Widespread in Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI

Caradrina morpheus

Mottled Rustic

N

Insect - moth

A common noctuid moth whose larvae feed on nettle, dandelion and other low-growing plants. It is in marked decline in the UK, but has been very widely recorded in Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	13/07/2007	Fitzhall Lodgelping
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI

Diarsia rubi

Small Square-spot

N

Insect - moth

A brown noctuid moth which flies in early and again in late summer. Larvae eat a wide variety of low-growing plants. Widespread and often abundant in Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	06/09/2007	Fitzhall Lodgelping
SU855218	Kay Bridger;Mike Bridger;Robin	12/09/2007	Stedham Common
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI

Diloba caeruleocephala

Figure of Eight

N

Insect - moth

An autumn-flying moth of woodlands, hedges and commons. Larvae on a variety of trees. Widespread but rather scarce in Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	26/10/2007	Fitzhall Lodgelping

Eugnorisma glareosa

Autumnal Rustic

N

Insect - moth

A late summer and autumn flying moth found in a wide range of habitats. Very local in Sussex and rather seldom recorded.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	21/09/2007	Fitzhall Lodgelping
SU855218	Kay Bridger;Mike Bridger;Isobel Perry;Mike Perry;Robin Storkey	21/09/2005	Stedham Common

Hoplodrina blanda

Rustic

N

Insect - moth

A noctuid moth of gardens, grasslands and heath with larvae that feed on a variety of low-growing plants. Very widely recorded in Sussex, but in marked decline in the UK generally.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	06/09/2007	Fitzhall Lodgelping
SU855218	Kay Bridger;Mike Bridger;Isobel Perry;Mike Perry;Robin Storkey	11/07/2007	Stedham Common
SU855219	A. Bradshaw;Julian Clarke	31/07/2004	Stedham Common, Midhurst, West Sussex (VC13)
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI
SU85652174	Robin Storkey	16/09/2003	Stedham Common

Hydraecia micacea

Rosy Rustic

N

Insect - moth

A widespread noctuid moth, but one that is in marked decline in the British Isles. Larvae feed in the larger roots of a variety of plants such as docks. Very widely recorded in Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	21/09/2007	Fitzhall Lodgelping

Melanchra persicariae

Dot Moth

N

Insect - moth

A dark noctuid moth with a distinctive white wing spot. Larvae feed on a wide variety of low-growing plants and trees. Widely recorded in Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	13/07/2007	Fitzhall Lodgelping
SU855218	Mike Bridger;Mike Perry;Robin Storkey	12/07/2005	Stedham Common
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI

Melanchra pisi

Broom Moth

N

Insect - moth

A mid-brown, variable noctuid moth associated with open woodland and heathland. The distinctive caterpillar with longitudinal yellow stripes feeds on broom, bracken and other plants. Recorded from across Sussex, but not common.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	08/06/2007	Fitzhall Lodgelping
SU855218	Robin Storkey & Mike Perry	19/07/2004	Stedham Common
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI
SU85652174	Robin Storkey	16/06/2003	Stedham Common

Mythimna comma

Shoulder-striped Wainscot

N

Insect - moth

One of the more strongly patterned wainscot moths flying in midsummer. The larvae are found on various grasses.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	20/05/2007	Fitzhall Lodgelping
SU856219	John Radford;Rosemary Radford	1975 - 1995	Stedham and Iping Commons SSSI

Orthosia gracilis

Powdered Quaker

N

Insect - moth

An early-flying noctuid moth attracted to willow blossom and other flowers in April and May. Larvae usually on willow in southern Britain. Widespread in Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	17/04/2007	Fitzhall Lodgelping

Tholera decimalis

Feathered Gothic

N

Insect - moth

A brown noctuid moth of rough grasslands in late summer and autumn with white feathering on the forewings. Larvae on grass. Widespread in Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	13/09/2007	Fitzhall Lodgelping
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI

Xanthia icteritia

Sallow

N

Insect - moth

An attractive yellow and brown autumn-flying noctuid. The larvae feed first on willow catkins then on low-growing plants. Widespread in Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	24/10/2007	Fitzhall Lodgelping
SU8521	Tony Davis	08/10/2011	Stedham Common sand pit, West Sussex (VC13)
SU855218	Kay Bridger;Mike Bridger;Isobel Perry;Mike Perry;Robin Storkey	21/09/2005	Stedham Common

Xestia agathina

Heath Rustic

N

Insect - moth

A patterned brown noctuid moth of heathland with larvae that feed on heather. Recorded only from four locations, all in West Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	21/09/2007	Fitzhall Lodgelping
SU8521	Peter Patton;Sarah Patton	10/03/2007	Stedham Common, West Sussex (VC13)
SU855218	Kay Bridger;Mike Bridger;Robin	12/09/2007	Stedham Common

Xestia castanea

Neglected Rustic

N

Insect - moth

A rather variable noctuid moth of heathland whose larvae feed on heathers. Recorded only from a small number of locations, both in East and West Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	21/09/2007	Fitzhall Lodgelping
SU855218	Kay Bridger;Mike Bridger;Robin	12/09/2007	Stedham Common
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI

Coenonympha pamphilus

Small Heath

N

Insect - butterfly

A small grassland butterfly that is fairly widespread in Sussex, especially on the Downs. The species has become much less common than it used to be in many areas in recent decades.

Designations

IUCN (2001) - Lower risk - near threatened, Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU856218	Mike Edwards	1988	Stedham Common

Hipparchia semele

Grayling

N

Insect - butterfly

Once widespread over the downs, now restricted to one valley near Wilmington. This species can occasionally be found in the far north-west of Sussex however this represents over-flow from Hampshire populations as opposed to an established Sussex colony.

Designations

IUCN (2001) - Vulnerable, Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, Sussex Rare Species Inventory, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU856218	E C M Haes	January 1984 - July 1985	Stedham Common

Lasiommata megera

Wall

N

Insect - butterfly

A grassland butterfly that has undergone a severe decline and now is normally only found near the coast and on the eastern part of the South Downs.

Designations

IUCN (2001) - Lower risk - near threatened, Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU856218	Mike Edwards	1988	Stedham Common

Limenitis camilla

White Admiral

N

Insect - butterfly

A fairly widespread woodland butterfly that has increased a little in numbers and range in Sussex in recent decades. The larvae are found on honeysuckle.

Designations

IUCN (2001) - Vulnerable, Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU852219	Andrew Guest	10/07/2004	Iping & Stedham Commons
SU856218	Mike Edwards	1988	Stedham Common

Bufo bufo

Common Toad

N

Amphibian

Still a widespread species in Sussex but declining due to loss of habitat and other factors. Toads tend to have large populations centred on particular breeding sites and they may become locally extinct if these are damaged or destroyed. Common toads are legally protected against sale.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species, Wildlife and Countryside Act 1981 (Schedule 5 Section 9.5a), Wildlife and Countryside Act 1981 (Schedule 5 Section 9.5b))

Grid Reference	Recorder	Date	Locality
SU856218	David Randall	13/09/2000	Stedham Common
SU856219	A Allen	1975	Stedham and Iping Commons SSSI

Erinaceus europaeus

West European Hedgehog

N

Terrestrial mammal

The hedgehog is one of our most familiar and endearing small mammals and it is still widespread in Sussex and Britain. However, hedgehog numbers have been adversely affected by changes in agriculture with less permanent pasture and fewer hedgerows. Climate change may also affect the availability of earthworms, one of their main foods, during hot, dry summers. There is some survey evidence that hedgehogs are most common where badgers are rarer and badgers do, of course, prey on them.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU856219	Andrew Tittensor	1970 - 1975	Stedham and Iping Commons SSSI

Lepus europaeus

Brown Hare

N

Terrestrial mammal

Widely distributed throughout England and Wales and probably an ancient introduction. Hares occur on a wide range of mainly open farmland and nationally the species is thought to be undergoing a steady decline. Much less common in Sussex than it used to be, but widely recorded.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU856219	Andrew Tittensor	1970 - 1975	Stedham and Iping Commons SSSI

Arvicola amphibius

European Water Vole

N

Terrestrial mammal

The fastest declining native British mammal, the water vole was 'Ratty' in Wind in the Willows. Water voles prefer slow flowing streams, rivers and dykes with steep earth banks and luxuriant emergent vegetation. They have been in decline for over a century mainly due to loss of habitat while the presence of American mink has greatly hastened this decline. In many areas of mainland Britain water voles are already extinct but there are still some strong populations in Sussex. A legally protected species, listed on the Sussex Rare Species Inventory and the subject of a Sussex Species Action Programme.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, Sussex Protected Species Register, Sussex Rare Species Inventory, UK Biodiversity Action Plan priority species, Wildlife and Countryside Act 1981 (Schedule 5 Section 9.1 (killing/injuring)), Wildlife and Countryside Act 1981 (Schedule 5 Section 9.1 (taking)), Wildlife and Countryside Act 1981 (Schedule 5 Section 9.2), Wildlife and Countryside Act 1981 (Schedule 5 Section 9.4, subdivision a), Wildlife and Countryside Act 1981 (Schedule 5 Section 9.4b), Wildlife and Countryside Act 1981 (Schedule 5 Section 9.5a), Wildlife and Countryside Act 1981 (Schedule 5 Section 9.5b), Wildlife and Countryside Act 1981 (Schedule 5)

Grid Reference	Recorder	Date	Locality
SU856219	Andrew Tittensor	1970 - 1975	Stedham and Iping Commons SSSI

Micromys minutus

Harvest Mouse

N

Terrestrial mammal

A tiny orange-brown mouse with a long, prehensile tail once familiar in cornfields but now mainly confined to field edges, grassy hedges and scrub. The mice make breeding nests of woven grass up to one metre above the ground. Widespread changes in agricultural practice have removed large areas of suitable habitat in which harvest mice appeared to be abundant and numbers are thought to have declined substantially. It has been widely recorded in Sussex, often in places near the coast.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU851217	Rob Free	31/03/2004	Iping Common
SU856219	Andrew Tittensor	1970 - 1975	Stedham and Iping Commons SSSI

Muscardinus avellanarius

Hazel Dormouse

N

Terrestrial mammal

A nocturnal species of woodland and overgrown hedgerows. Dormice spend much of their time climbing among branches in search of fruit, nuts, insects and other food. They sleep in nests during the day in hollow trees, unoccupied bird or bat boxes and similar places and hibernate in winter. Dormice occur mainly in southern England in this country and are widespread in suitable habitats in Sussex.

Designations

European Protected Species, Habitats Directive Annex 4, Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, Sussex Protected Species Register, UK Biodiversity Action Plan priority species, Wildlife and Countryside Act 1981 (Schedule 5 Section 9.4b), Wildlife and Countryside Act 1981 (Schedule 5 Section 9.5a), Wildlife and Countryside Act 1981 (Schedule 5 Section 9.5b), Wildlife and Countryside Act 1981 (Schedule 5)

Grid Reference	Recorder	Date	Locality
SU856219	Andrew Tittensor	1970 - 1975	Stedham and Iping Commons SSSI

Anguis fragilis

Slow-worm

N

Reptile

A legally protected legless lizard resembling a small snake. Slow-worms are widespread in southern England and found in open habitats such as rough grassland, heath and on road and railway embankments. They are often common in urban and suburban areas. Like most reptiles and amphibians they have declined considerably and need protection wherever they occur.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, Sussex Protected Species Register, UK Biodiversity Action Plan priority species, Wildlife and Countryside Act 1981 (Schedule 5 Section 9.1 (killing/injuring)), Wildlife and Countryside Act 1981 (Schedule 5 Section 9.5a), Wildlife and Countryside Act 1981 (Schedule 5 Section 9.5b)

Grid Reference	Recorder	Date	Locality
SU8500021933	Recorder @ Surrey ARG	01/06/2013	Iping Common
SU8505521763	Phil Price	06/04/2012	Iping Common
SU8505521764	Recorder @ Surrey ARG	04/05/2013	Iping Common
SU8505921759	Phil Price	17/04/2011	Iping Common, West Sussex (VC13)
SU8506121722	Recorder @ Surrey ARG	04/05/2013	Iping Common
SU8507221786	Phil Price	07/05/2012	Iping Common
SU8507721785	Recorder @ Surrey ARG	01/06/2013	Iping Common
SU8507921781	Phil Price	20/08/2011	Iping Common
SU8507921785	Phil Price	11/03/2012	Iping Common
SU8508221785	Phil Price	06/04/2012	Iping Common
SU8508221789	Recorder @ Surrey ARG	01/09/2012	Iping Common
SU8509221725	Recorder @ Surrey ARG	01/06/2013	Iping Common
SU8509721745	Anne Goodenough	14/04/2012	Iping Common
SU8510821769	Phil Price	16/05/2015	Iping Common, Tin: IPC-007T
SU8511021791	Recorder @ Surrey ARG	09/03/2013	Iping Common
SU8515721913	Phil Price	20/08/2011	Iping Common
SU8516121921	Phil Price	17/06/2012	Iping Common
SU8516121922	Recorder @ Surrey ARG	01/09/2012	Iping Common
SU8521	SARG Sussex Amphibian & Reptile Grp; Dennis Dey	19/07/1995	Minsted Road, near Stedham Common, West Sussex (VC13)
SU853219	SARG recorder	12/09/2001	Stedham Common
SU856218	SARG Sussex Amphibian & Reptile Grp	1995	Stedham Common
SU856219	A Allen	1975	Stedham and Iping Commons SSSI

Reptile

A widespread, but legally protected, snake with a normally olive body flecked with black and a distinctive yellow collar. Frequent in Sussex near places where its food, largely frogs, is readily available. Like most reptiles and amphibians, grass snakes have declined considerably and need protection wherever they occur.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, Sussex Protected Species Register, UK Biodiversity Action Plan priority species, Wildlife and Countryside Act 1981 (Schedule 5 Section 9.1 (killing/injuring)), Wildlife and Countryside Act 1981 (Schedule 5 Section 9.5a), Wildlife and Countryside Act 1981 (Schedule 5 Section 9.5b)

Grid Reference	Recorder	Date	Locality
SU8510821769	Phil Price	08/05/2011	Iping Common, West Sussex (VC13)
SU8521	SARG Sussex Amphibian & Reptile Grp; Dennis Dey	01/01/1992	Stedham Common, West Sussex (VC13)
SU856218	David Randall	21/10/2000	On the gas main, Eastern end., Stedham Common
SU856219	A Allen	1975	Stedham and Iping Commons SSSI

Reptile

The most abundant British lizard and widespread in Sussex in the Weald and along the coast. Probably under-recorded and increasingly confined to small areas of open sunny habitat. A legally protected species due to concern about its overall decline.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, Sussex Protected Species Register, UK Biodiversity Action Plan priority species, Wildlife and Countryside Act 1981 (Schedule 5 Section 9.1 (killing/injuring)), Wildlife and Countryside Act 1981 (Schedule 5 Section 9.5a), Wildlife and Countryside Act 1981 (Schedule 5 Section 9.5b)

Grid Reference	Recorder	Date	Locality
SU8500121928	Anne Goodenough	18/09/2010	Iping Common
SU8500321865	Recorder @ Surrey ARG	19/05/2013	Iping Common
SU8502121962	Phil Price	16/05/2015	Iping Common
SU850216	SARG Sussex Amphibian & Reptile Grp; Dennis Dey	29/06/1991	Iping Common, West Sussex (VC13)
SU8502621735	Anne Goodenough	14/04/2012	Iping Common
SU8505521763	Phil Price	06/04/2012	Iping Common
SU8505721756	Phil Price	25/06/2011	Iping Common, West Sussex (VC13)
SU8505721760	Recorder @ Surrey ARG	06/04/2013	Iping Common
SU8505821763	Phil Price	20/08/2011	Iping Common
SU8506121722	Phil Price	25/06/2011	Iping Common, West Sussex (VC13)
SU8506621630	Recorder @ Surrey ARG	19/05/2013	Iping Common
SU8507721785	Recorder @ Surrey ARG	01/06/2013	Iping Common
SU8507921785	Phil Price	11/03/2012	Iping Common
SU8509221725	Recorder @ Surrey ARG	06/10/2012	Iping Common
SU8509621738	Phil Price	06/04/2012	Iping Common
SU8509721745	Phil Price	20/08/2011	Iping Common
SU8509721746	Recorder @ Surrey ARG	13/07/2013	Iping Common
SU8510021755	Recorder @ Surrey ARG	01/09/2012	Iping Common
SU8510421772	Phil Price	07/05/2012	Iping Common
SU8510821769	Phil Price	08/05/2011	Iping Common, West Sussex (VC13)
SU8511021791	Phil Price	07/05/2012	Iping Common
SU8511121872	Phil Price	17/06/2012	Iping Common
SU8511421874	Anne Goodenough	18/09/2010	Iping Common
SU851219	John Hodgson	14/04/2009	Iping Common
SU8515621926	Recorder @ Surrey ARG	01/09/2012	Iping Common
SU8515721913	Phil Price	20/08/2011	Iping Common
SU8515921925	Phil Price	17/06/2012	Iping Common
SU8521	Sarah Patton	28/03/2007	Stedham Common
SU8521221999	Phil Price	06/08/2011	Iping Common
SU856218	SARG Sussex Amphibian & Reptile Grp	1995	Stedham Common
SU856219	Elizabeth Haslewood; Geoff Haslewood	17/06/1985	Stedham and Iping Commons SSSI
SU8580421919	Anne Goodenough	14/04/2012	Iping Common

Vipera berus

Adder

N

Reptile

Britain's only venomous snake, though incidences of snakebite involving man or domestic animals are relatively uncommon. Adders have a distinctive zig zag pattern of black or brown and white. They occur in open areas on downs, heaths and in heathy woods. Grass snakes and slow-worms are often misidentified as adders. Though widespread in Britain and found in suitable areas across Sussex, the adder, like all our native reptiles has declined substantially through habitat loss and other factors. The adder is a protected species and it is illegal intentionally to kill or injure them.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, Sussex Protected Species Register, UK Biodiversity Action Plan priority species, Wildlife and Countryside Act 1981 (Schedule 5 Section 9.1 (killing/injuring)), Wildlife and Countryside Act 1981 (Schedule 5 Section 9.5a), Wildlife and Countryside Act 1981 (Schedule 5 Section 9.5b)

Grid Reference	Recorder	Date	Locality
SU8506121722	Phil Price	06/04/2012	Iping Common
SU8510421770	Phil Price	20/08/2011	Iping Common
SU8511021791	Phil Price	04/06/2011	Iping Common, West Sussex (VC13)
SU8521	SARG Sussex Amphibian & Reptile Grp; Dennis Dey	01/01/1992	Stedham Common, West Sussex (VC13)
SU853216	John Hodgson	30/06/2009	Stedham Common
SU856218	SARG Sussex Amphibian & Reptile Grp	1995	Stedham Common
SU856219	A Allen	1975	Stedham and Iping Commons SSSI

Dicranum spurium

Rusty Fork-moss

N

Moss

A rare heathland moss with a characteristic bushy appearance growing on thin peat layers. Widespread on West Sussex commons.

Designations

IUCN (2001) - Vulnerable, Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU8521	Francis Rose	10/03/1994	Stedham Common
SU854216	Francis Rose	1987	Stedham and Iping Commons SSSI
SU856216	Francis Rose	26/07/1986	Stedham Common, West Sussex (VC13)
SU856218	Francis Rose	16/09/1951 - 27/02/1954	Stedham Common
SU856219	Anon @ EN - S.E. Region	1970	Stedham and Iping Commons SSSI
SU857216	Francis Rose	1991 - 1992	Stedham Common

Lycopodiella inundata

Marsh Clubmoss

N

Clubmoss

A clubmoss of wet, bare, peaty or sandy margins of lakes, pools, flushes and trackways. Declining nationally, but known from several sites heathland sites in East and West Sussex.

Designations

IUCN (2001) - Endangered, Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, Sussex Rare Species Inventory, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU8521	Francis Rose	14/10/1994	Stedham Common
SU85432177	Graeme Lyons;James Power;Jane Willmott	30/05/2012	Stedham Common SWT Reserve
SU85452178	Graeme Lyons;Mark Gurney;Adrian Holloway	05/06/2014	Stedham Common SWT Reserve
SU856218	Anon @ Sussex Bot. Rec. Soc.;Francis Rose	1994	Stedham Common
SU856219	Anon @ EN - S.E. Region	1970	Stedham and Iping Commons SSSI
SU857217	Jacqui Middleton	12/08/2001	Stedham Common

Chamaemelum nobile

Chamomile

N

Flowering plant

The decline in many parts of Britain of this species of heaths and commons became apparent towards the end of the last century. The plant still occurs in both East and West Sussex on greens, cricket fields and closely mown unimproved turf and may increase in response to pony grazing.

Designations

IUCN (2001) - Vulnerable, Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec, Sussex Biodiversity Action Plan, Sussex Rare Species Inventory, UK Biodiversity Action Plan priority species)

Grid Reference	Recorder	Date	Locality
SU855219	E C M Haes;George Bishop;Betty Bishop	1984 - 1985	Stedham Common
SU857218	C R Hall;Heather Winship	21/08/1997	Stedham Common
SU857219	Anon @ Sussex Bot. Rec. Soc.;Nick Sturt	1993	Stedham, West Sussex (VC13)
SU8575221907	Dawn Nelson	16/07/2008	Stedham Common

SUSSEX RARE SPECIES INVENTORY

The Rare Species Inventory does not include bat, bird or otter records.
Bat and bird records are included in separate inventories, while otter records are not included in SxBRC reports.

The Sussex Rare Species Inventory (RSI) contains over 3,400 species. These species are selected according to strict criteria of rarity associated with their occurrence in Sussex.

The criteria for selection of species are listed below:

- All species in the British Red Data Books including all Notable fauna and Nationally Scarce flora and British endemic taxa which have ever occurred in Sussex whether extinct or not.
- Species included in the UK Biodiversity Action Plan (BAP species).
- Internationally rare taxa cited in the Bern Convention, IUCN Red Data lists, or EU Habitats Directive which are not covered by any of the above.

The RSI has been designed to be comprehensive for species but representative for records. This is managed in several ways:

- RSI records are labelled so that only one record per species per grid reference gets flagged up. This will usually be the most up to date record.
- SxBRC does not hold marine information other than coastal species and cetaceans.
- The following species are relatively common in Sussex but are in the RSI because they are Notable or Nationally Scarce. Only *one* record of these species is labelled per 2km tetrad:

Round-headed Rampion	<i>Phyteuma orbiculare</i>
Frogbit	<i>Hydrocharis morus-ranae</i>
Adonis Blue	<i>Lysandra bellargus</i>
Long-winged Conehead	<i>Conocephalus discolor</i> (syn. <i>C. fuscus</i>)
Variable Damselfly	<i>Coenagrion pulchellum</i>
Downy Emerald	<i>Cordulea aenea</i>

For records of rare vascular plants, bryophytes and lichens the Record Centre recommends the Sussex Rare Plant Register, compiled by the Sussex Botanical Recording Society. This gives information on the distribution and status of over 400 Sussex Rare Plants, putting data from RSI reports into a Sussex-wide context. Please see [our website](#) for more information.

IUCN Categories of Rarity

The following is a summary of the IUCN categories of rarity. For further information visit the [IUCN website](#).

Extinct (EX)

A taxon is Extinct when there is no reasonable doubt that the last individual has died.

Extinct in the Wild (EW)

A taxon is Extinct in the Wild when it is known only to survive in cultivation, in captivity or as a naturalized population (or populations) well outside the past range.

Critically Endangered (CR)

A taxon is Critically Endangered when it is considered to be facing an extremely high risk of extinction in the wild.

Endangered (EN)

A taxon is Endangered when it is considered to be facing a very high risk of extinction in the wild.

Vulnerable (VU)

A taxon is Vulnerable when it is considered to be facing a high risk of extinction in the wild.

Near Threatened (NT)

A taxon is Near Threatened when it is close to qualifying for or is likely to qualify for a threatened category in the near future.

Least Concern (LC)

A taxon is Least Concern when it has been evaluated against the criteria and does not qualify for Critically Endangered, Endangered, Vulnerable or Near Threatened.

Data Deficient (DD)

A taxon is Data Deficient when there is inadequate information to make a direct, or indirect, assessment of its risk of extinction based on its distribution and/or population status.

Not Evaluated (NE)

A taxon is Not Evaluated when it has not yet been evaluated against the criteria.

Regionally Scarce (NR)

Occurs in 5 or fewer 10km squares in a particular region of Britain. Locally determined.

SUSSEX RARE SPECIES INVENTORY REPORT

Please note that bat, bird and otter records are not included in this report

Land at public footpath 907, Minsted

22 June 2015 ESD/15/441 Search Area: SU8521
 Alec Fry (Minsted Residents Group)

Araniella displicata

Spider (Araneae)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU853219	Graeme Lyons;Andy Phillips	19/09/2012	Stedham Control Area
SU85462187	Graeme Lyons;Andy Phillips;Chris Bentley;Evan Jones	28/09/2013	Stedham Common SWT Reserve

Ero tuberculata

Spider (Araneae)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU853219	Graeme Lyons;Andy Phillips	19/09/2012	Stedham Control Area
SU85462187	Graeme Lyons;Andy Phillips;Chris Bentley;Evan Jones	28/09/2013	Stedham Common SWT Reserve

Evarcha arcuata

Spider (Araneae)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850217	Andy Phillips	17/08/2007	Iping Common
SU855217	Andy Phillips	13/06/2007	Stedham Common
SU856218	Mike Edwards	1988	Stedham Common

Marpissa muscosa

Spider (Araneae)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU855217	Andy Phillips	13/06/2007	Stedham Common
SU856218	Mike Edwards	1988	Stedham Common

Thomisus onustus

Spider (Araneae)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU85452182	Graeme Lyons	21/06/2013	Stedham Common SWT Reserve
SU856218	E C M Haes	1985	Stedham Common

Euglenes oculatus

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Unknown	1980 - 1989	Stedham Common

Platystomos albinus

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Sarah Patton	01/05/2007	Stedham Common

Catapion pubescens

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Unknown	1980 - 1989	Stedham Common

Agonum (Agonum) sexpunctatum

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Peter Hodge	09/05/1999	Stedham Common
SU854218	Peter Hodge	03/05/1997	Stedham Common
SU85452178	Graeme Lyons;Mark Gurney;Adrian Holloway	05/06/2014	Stedham Common SWT Reserve
SU855219	Peter Hodge	03/05/1997	Stedham Common
SU856218	Unknown	1980 - 1989	Stedham Common

Bembidion (Notaphus) obliquum

Insect - beetle (Coleoptera)

A small dull bronze ground beetle found on mud and litter at the edge of standing fresh water on acid soils. Recorded quite widely in suitable habitats in East and West Sussex. The species has two main centres in the British Isles: South East England and Yorkshire and the Midlands.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Peter Hodge	1986	Stedham Common

Carabus (Carabus) granulatus

Insect - beetle (Coleoptera)

A large ground beetle of open, wet habitats such as marshes and fens. Recorded from four sites in West Sussex and one in East Sussex. Widespread elsewhere in the British Isles.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	E C M Haes	1985	Stedham Common

Nebria (Nebria) salina

Insect - beetle (Coleoptera)

A local ground beetle of well-drained open substrates. Sussex records are mainly from shingle beaches along the coast and inland heaths and commons. Elsewhere in the British Isles it is widespread on mountains and heaths.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU85022190	Graeme Lyons	17/05/2013	Iping Common SWT Reserve
SU853219	Graeme Lyons	25/10/2012	Stedham Control Area

Stenolophus teutonius

Insect - beetle (Coleoptera)

A ground beetle of damp, open areas near water with most records now coming from Hampshire, Surrey and Sussex. All recent records in our area are from West Sussex, but there is a pre-1905 report from Guestling in East Sussex.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Peter Hodge	1983	Stedham Common
SU852219	N F Heal	30/05/1996	Stedham Common
SU856218	Unknown	1990 - 1993	Stedham Common

Leptura aurulenta

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850217	Peter Hodge	13/06/2007	Stedham/Iping Commons, Iping Common, Area 3
SU85192199	Graeme Lyons	16/07/2014	Iping Common SWT Reserve
SU856218	E C M Haes	1985	Stedham Common

Leptura quadrifasciata

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850217	Peter Hodge	13/06/2007	Stedham/Iping Commons, Iping Common, Area 3
SU850218	Mike Edwards;Peter Hodge	15/06/2003 - 07/09/2003	West Sussex (VC13)

Chaetocnema confusa

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU854218	Peter Hodge	03/05/1997	Stedham Common
SU855219	Peter Hodge	03/05/1997	Stedham Common

Cryptocephalus biguttatus

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Mike Edwards;Peter Hodge	15/06/2003 - 07/09/2003	Stedham Common

Cryptocephalus parvulus

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850217	G. Collins	17/08/2007	Iping Common
SU850218	Mike Edwards;Peter Hodge	15/06/2003 - 07/09/2003	West Sussex (VC13)
SU85412187	Peter Hodge	13/06/2007	Stedham/Iping Commons, Stedham Common, Area 2
SU85512177	Peter Hodge	17/08/2007	Stedham Common
SU856218	Mike Edwards;Peter Hodge	15/06/2003 - 07/09/2003	Stedham Common

Gastrophysa viridula

Green Dock Beetle

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU851219	Roger Booth	29/06/2004	West Sussex (VC13)

Longitarsus parvulus

Flax Flea Beetle

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU855219	Peter Hodge	03/05/1997	Stedham Common

Longitarsus tabidus

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Peter Hodge	1980 - 1989	Stedham Common

Bagous (Bagous) lutulosus

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU853219	N F Heal	20/05/1998	Stedham Common
SU856218	Unknown	1980 - 1989	Stedham Common

Curculio rubidus

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU85712178	Peter Hodge	17/08/2007	Stedham Common

Pelenomus olssoni

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU852219	N F Heal	16/07/1996	Stedham Common
SU854219	Peter Hodge	24/08/1986	Stedham Common
SU856218	A P Fowles	28/07/1990	Stedham Common

Tychius pusillus

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU854219	Peter Hodge	24/08/1986	Stedham Common

Xyleborus dispar

Ambrosia Beetle

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Unknown	1980 - 1989	Stedham Common

Agabus

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Unknown	1980 - 1989	Stedham Common

Ampedus cinnabarinus

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Peter Hodge	1985	Stedham Common

Ampedus elongantulus

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU854218	Peter Hodge	13/06/2007	Stedham/Iping Commons, Stedham Common, Area 2

Ampedus sanguinolentus

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Sarah Patton	01/05/2007	Stedham Common

Dacne rufifrons

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU853219	Roger Booth	16/09/2003	West Sussex (VC13)

Tritoma bipustulata

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Unknown	1980 - 1989	Stedham Common

Trypocopris pyrenaeus

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	E C M Haes	1984	Stedham Common

Melandrya caraboides

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU852219	N F Heal	20/05/1998	Stedham Common

Dieckmanniellus gracilis

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU852219	N F Heal	16/07/1996	Stedham Common
SU854219	Peter Hodge	24/08/1986	Stedham Common
SU856218	Unknown	1990 - 1993	Stedham Common

Ptenidium (Gressnerium) gressneri

Insect - beetle (Coleoptera)

Designations

Nationally Notable; Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU852219	N F Heal	30/05/1996	Stedham Common

Pyrochroa coccinea

Black-headed Cardinal Beetle

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Unknown	1980 - 1989	Stedham Common

Deporaus (Caenorhinus) mannerheimii

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU853219	Graeme Lyons	31/05/2012	Stedham Control Area

Metoecus paradoxus

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU853219	Graeme Lyons;Andy Phillips	19/09/2012	Stedham Control Area

Sphindus dubius

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Unknown	1980 - 1989	Stedham Common

Mycetoporus punctus

Insect - beetle (Coleoptera)

Designations

Nationally Notable; Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	P M Hodges	1985	Stedham Common

Scaphisoma boleti

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Unknown	1980 - 1989	Stedham Common

Sepedophilus bipunctatus

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Unknown	1980 - 1989	Stedham Common

Sepedophilus testaceus

Insect - beetle (Coleoptera)

Designations

Nationally Notable; Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Unknown	1980 - 1989	Stedham Common

Stenus (Stenus) providus

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU852219	N F Heal	20/05/1998	Stedham Common

Eledona agricola

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU853219	Roger Booth	16/09/2003	West Sussex (VC13)

Hallomenus binotatus

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Unknown	1980 - 1989	Stedham Common

Pycnomerus fuliginosus

Insect - beetle (Coleoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Peter Hodge	09/05/1999	Stedham Common
SU856218	N F Heal	May 1999	Stedham Common

Ectobius lapponicus

Dusky Cockroach

Insect - cockroach (Dictyoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Mike Edwards;Peter Hodge	15/06/2003 - 07/09/2003	Stedham Common

Ectobius pallidus

Tawny Cockroach

Insect - cockroach (Dictyoptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Mike Edwards	1988	Stedham Common
SU856218	Mike Edwards	1988	Stedham Common

Asilus crabroniformis

Hornet Robberfly

Insect - true fly (Diptera)

A large black and yellow robber fly of heaths and pastures. A declining species, commoner in the west. Recorded mainly from then West Sussex downs but also known from East Sussex. 1972-2001.

Designations

Nationally Notable; Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec);
Sussex Biodiversity Action Plan; Sussex Rare Species Inventory; UK Biodiversity Action Plan priority species

Grid Reference	Recorder	Date	Locality
SU85122188	Graeme Lyons;Shaun Pryor	01/08/2013	Iping Common SWT Reserve
SU8563221963	Graeme Lyons	08/09/2008	Stedham & Iping Common SWT Reserve

Eutolmus rufibarbis

Golden-tabbed Robberfly

Insect - true fly (Diptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU853219	Graeme Lyons;Andy Phillips	31/07/2012	Stedham Control Area

Thyridanthrax fenestratus

Mottled Bee-fly

Insect - true fly (Diptera)

A strikingly marked bee fly of sandy heaths in southern England. Widely recorded from suitable heathland habitats in West Sussex.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; Sussex Biodiversity Action Plan; Sussex Rare Species Inventory; UK Biodiversity Action Plan priority species

Grid Reference	Recorder	Date	Locality
SU850218	Mike Edwards;Peter Hodge	15/06/2003 - 07/09/2003	West Sussex (VC13)
SU85052184 SU8521	Graeme Lyons;Andy Phillips Graeme Lyons;Kevin Lerwill	04/05/2010 28/06/2010	Iping Common SWT Reserve Iping and Stedham Commons

*Melanogaster aerea***Insect - true fly (Diptera)****Designations**

Nationally Notable; Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	John Maskrey	16/06/1985	Stedham Common

*Microdon analis***Insect - true fly (Diptera)****Designations**

Nationally Notable; Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU85382195	Graeme Lyons;Penny Green	28/05/2012	Stedham Common SWT Reserve

*Sphaerophoria virgata***Insect - true fly (Diptera)****Designations**

Nationally Notable; Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Mike Edwards;Peter Hodge	1980 - 1989	Iping and Trotton Commons

*Tipula livida***Insect - true fly (Diptera)****Designations**

Nationally Notable; Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Mike Edwards	May 1996 - August 1996	Stedham Common

Rhyparochromus pini

Insect - true bug (Hemiptera)

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Mike Edwards;Peter Hodge	15/06/2003 - 07/09/2003	West Sussex (VC13)
SU854219	Graeme Lyons	31/05/2012	Stedham Common SWT Reserve
SU855219	Peter Hodge	1993	Stedham Common

Andrena (Hoplاندrena) trimmerana

Trimmer's Mining Bee

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	13/06/2007	Iping Common

Andrena (Leucandrena) argentata

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	04/08/2007	Iping Common
SU8521	Recorder @ BWARS	14/07/1990	Stedham Common
SU856218	Unknown	1980 - 1989	Stedham Common
SU857219	James Power	10/07/2011	West Sussex (VC13)

Andrena (Plastandrena) bimaculata

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	14/08/1982	Iping Common

Andrena (Poliandrena) florea

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	16/06/1984	Iping Common
SU856218	Unknown	1990 - 1993	Stedham Common

Andrena (Simandrena) congruens

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	17/08/1985	Iping Common
SU856218	Unknown	1980 - 1989	Stedham Common

Ceratina (Euceratina) cyanea

Blue Carpenter Bee

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	14/08/1984	Iping Common
SU8521	Recorder @ BWARS	14/07/1990	Stedham Common
SU856218	Unknown	1980 - 1989	Stedham Common

Halictus (Seladonia) confusus

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	26/07/1984	Iping Common
SU8521	Mike Edwards;Peter Hodge	1980 - 1989	Iping and Trotton Commons
SU856218	Unknown	1980 - 1989	Stedham Common

Heriades truncorum

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Unknown	1980 - 1989	Stedham Common

Hylaeus (Prosopis) gibbus

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	09/07/1994	Iping Common NR
SU8521	Mike Edwards;Peter Hodge	1980 - 1989	Iping and Trotton Commons
SU856218	Unknown	1980 - 1989	Stedham Common

Lasioglossum (Evylaeus) malachurum

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Recorder @ BWARS	10/05/1998	Shedfield Common

Lasioglossum (Evylaeus) pauxillum

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Recorder @ BWARS	10/05/1998	Shedfield Common

Melitta tricincta

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Unknown	1980 - 1989	Stedham Common

Nomada fucata

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	19/07/2007	Iping Common
SU8521	Recorder @ BWARS	18/08/1993	Minsted sand-pit, Midhurst

Sphecodes crassus

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	17/08/2007	Iping Common

Sphecodes reticulatus

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	10/09/1987	Iping Common
SU8521	Mike Edwards;Peter Hodge	1980 - 1989	Iping and Trotton Commons

Chrysis gracillima

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	26/08/1984	Iping Common

Chrysis illigeri

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Unknown	1980 - 1989	Stedham Common

Cerceris ruficornis

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	17/08/2007	Iping Common
SU855218	Recorder @ BWARS	21/08/1996	Stedham Wet Scrape
SU856217	Recorder @ BWARS	13/06/2007	Stedham Common, Midhurst

Crabro scutellatus

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Mike Edwards;Peter Hodge	15/06/2003 - 07/09/2003	West Sussex (VC13)

Crossocerus (Blepharipus) walkeri

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	26/07/1984	Iping Common NR

Diodontus insidiosus

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	09/06/2007	Iping Common

Ectemnius (Clytochrysus) ruficornis

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	31/07/1985	Iping Common
SU856218	Unknown	1990 - 1993	Stedham Common

Ectemnius (Clytochrysus) sexcinctus

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Unknown	1980 - 1989	Stedham Common

Ectemnius (Ectemnius) borealis

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	12/08/1984	Iping Common
SU855218	Recorder @ BWARS	28/08/1998	Stedham Common NR, wet scrape
SU856218	Unknown	1980 - 1989	Stedham Common

Mimesa bruxellensis

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	14/08/1981	Iping Common NR
SU8521	Mike Edwards;Peter Hodge	1980 - 1989	Iping and Trotton Commons

Mimumesa littoralis

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Mike Edwards	May 1996 - August 1996	Stedham Common

Mimumesa spooneri

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	14/08/1984	Iping Common NR
SU8521	Mike Edwards;Peter Hodge	1980 - 1989	Iping and Trotton Commons

Oxybelus mandibularis

Pale Jawed Spiny Digger Wasp

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	01/08/1984	Iping Common

Pemphredon (Ceratophorus) morio

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Unknown	1980 - 1989	Stedham Common

Philanthus triangulum

Bee Wolf

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850216	Recorder @ BWARS	17/08/2007	Iping Common, Midhurst
SU850218	Recorder @ BWARS	17/08/2007	Iping Common
SU8521	Recorder @ BWARS	18/08/1993	Minsted sand-pit, Midhurst
SU856217	Recorder @ BWARS	17/08/2007	Stedham Common, Midhurst
SU856218	Mike Edwards;Peter Hodge	15/06/2003 - 07/09/2003	Stedham Common
SU857219	James Power	10/07/2011	West Sussex (VC13)

Psenulus schencki

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	28/06/1984	Iping Common NR

Spilomena troglodytes

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	26/08/1984	Iping Common

Formica sanguinea

Slaver Ant

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850217	Recorder @ BWARS	06/07/2008	Iping Common
SU850218	Recorder @ BWARS	04/08/2007	Iping Common
SU855218	Recorder @ BWARS	16/07/2009	Stedham Common
SU856217	Recorder @ BWARS	17/08/2007	Stedham Common, Midhurst
SU856218	Mike Edwards;Peter Hodge	15/06/2003 - 07/09/2003	Stedham Common
SU857219	James Power	10/07/2011	West Sussex (VC13)

Mutilla europaea

Large Velvet Ant

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU855218	Recorder @ BWARS	28/08/1998	Stedham Common NR, wet scrape

Smicromyrme rufipes

Small Velvet Ant

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850217	Recorder @ BWARS	06/07/2008	Iping Common
SU850218	Recorder @ BWARS	13/06/2007	Iping Common
SU8521	Recorder @ BWARS	18/08/1993	Minsted sand-pit, Midhurst
SU856218	Mike Edwards;Peter Hodge	15/06/2003 - 07/09/2003	Stedham Common

Aporus unicolor

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	31/07/1985	Iping Common

Arachnospila (Anoplochaeres) minutula

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	15/07/1984	Iping Common

Evagetes dubius

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	17/08/2007	Iping Common
SU856218	Unknown	1980 - 1989	Stedham Common

Prionemism (Prionemism) hyalinata

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	17/08/1985	Iping Common
SU856218	Unknown	1980 - 1989	Stedham Common

Prionemism (Prionemism) schioedtei

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	28/07/1988	Iping Common
SU856218	Unknown	1970 - 1979	Stedham Common

Prionemism (Umbripennism) coriacea

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	09/06/2007	Iping Common
SU8521	Recorder @ BWARS	09/05/1999	Stedham Common

Prionemism confusor

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	10/09/1984	Iping Common NR

Methocha articulata

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	08/06/2007	Iping Common
SU8521	Mike Edwards;Peter Hodge	1990 - 1993	Iping and Trotton Commons

Tiphia minuta

Small Tiphia

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	13/06/2007	Iping Common

Dolichovespula (Dolichovespula) media

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Unknown	1990 - 1993	Stedham Common

Dolichovespula (Pseudovespula) saxonica

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU855218	Recorder @ BWARS	21/08/1996	Stedham Common, wet scrape
SU856218	Mike Edwards	May 1996 - August 1996	Stedham Common
SU857219	James Power	10/07/2011	West Sussex (VC13)

Eumenes coarctatus

Heath Potter Wasp

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	07/09/2003	Iping Common
SU855218	Recorder @ BWARS	02/08/1997	Stedham Common NR, wet scrape

Microdynerus exilis

Insect - hymenopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Recorder @ BWARS	01/08/1984	Iping Common NR

Atolmis rubricollis

Red-necked Footman

Insect - moth

A black nationally local species of deciduous woodland in southern England, Wales and south west Scotland. In Sussex it is only found regularly in Rewell Woods at Arundel and it may still be in Houghton Forest. Caterpillars feed on lichens on trees in woodlands.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	14/06/2007	Fitzhall Lodge, Iping
SU856219	Tony Davis	16/06/2007	Stedham Common

Eilema sororcula

Orange Footman

Insect - moth

A pretty nationally local species found in woods in southern UK. It has recently expanded its range. In Sussex it is now scattered over the county and can be quite common in woods. Caterpillars feed on lichens growing on trees.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	14/06/2007	Fitzhall Lodge, Iping
SU851218	Dave Green;Tony Davis;Penny Green	10/06/2014	Iping Common SWT Reserve
SU855218	Kay Bridger;Mike Bridger;Isobel Perry;Mike Perry;Robin Storkey	10/06/2007	Stedham Common
SU856219	Tony Davis	16/06/2007	Stedham Common

Anania verbascalis

Golden Pearl

Insect - moth**Designations**

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Sarah Patton	31/07/2004	Stedham Common
SU856219	Tony Davis	16/06/2007	Stedham Common

Crambus hamella

Dark Grass-veneer

Insect - moth**Designations**

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Sarah Love;Martin Love	30/08/2004	Stedham Common
SU855218	Kay Bridger;Mike Bridger;Isobel Perry;Mike Perry;Robin Storkey	31/08/2005	Stedham Common
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI

Crambus uliginosellus

Marsh Grass-veneer

Insect - moth

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI

Eudonia pallida

Marsh Grey

Insect - moth

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU851218	Dave Green;Tony Davis;Penny Green	10/06/2014	Iping Common SWT Reserve

Tetheella fluctuosa

Satin Lutestring

Insect - moth

This nationally local species occurs in mature woodlands in south east England, Wales, northern England and the great Glen in Scotland. In Sussex it is widespread and sometimes common in mature woods and wooded heaths throughout the county. Caterpillars feed on Birch.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	13/07/2007	Fitzhall Lodge, Iping
SU855218	Kay Bridger;Mike Bridger;Isobel Perry;Mike Perry;Robin Storkey	10/06/2007	Stedham Common
SU856219	Tony Davis	16/06/2007	Stedham Common
SU85652174	Robin Storkey	13/07/2003	Stedham Common

Paracolax tristalis

Clay Fan-foot

Insect - moth

A nationally scarce (a) species that is contracting its range and now only occurs in a few woods in Kent, Sussex and Surrey. In Sussex it is widespread in the Wealden woods of East Sussex but only occurs in the far north west of West Sussex. Caterpillars feed on Oak and other trees.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; Sussex Biodiversity Action Plan; Sussex Rare Species Inventory; UK Biodiversity Action Plan priority species

Grid Reference	Recorder	Date	Locality
SU850214	Anon @ Chichester NHS	11/04/2006 - 24/12/2006	Fitzhall Lodge, Iping
SU855218	Robin Storkey & Mike Perry	31/07/2004	Stedham Common

Parascotia fuliginaria

Waved Black

Insect - moth

This nationally scarce (b) species occurs in damp woods in south central England and on the Welsh borders. In Sussex it is now found in low numbers all over the county, but is most frequent in the north west. Caterpillars feed on Bracket fungi on moist wood.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU855219	A. Bradshaw;Julian Clarke	31/07/2004	West Sussex (VC13)
SU856219	John Radford;Rosemary Radford	1975 - 1995	Stedham and Iping Commons SSSI

Chloroclysta siterata

Red-green Carpet

Insect - moth

This woodland species is common in the north and west of Britain and scarce, but increasing elsewhere. In Sussex it is now widespread in the Wealden and greensand woodlands. Caterpillars feed on the leaves of various trees.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850214	Anon @ Chichester NHS	11/04/2006 - 24/12/2006	Fitzhall Lodge, Iping

Cyclophora annularia

Mocha

Insect - moth

This pretty nationally scarce (b) species occurs in woodlands in parts of southern England. In Sussex it is widespread in West Sussex, but in East Sussex only occurs regularly in the Brede Valley and the Hastings area. Caterpillars feed on Field Maple.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	26/08/2007	Fitzhall Lodge, Iping

Euphyia biangulata

Cloaked Carpet

Insect - moth

A nationally scarce (b) species of damp woodland that is found mostly in the western half of Britain. In Sussex it is currently found in two areas, the east of East Sussex around Hastings, Rye and Beckley and the north of West Sussex around Ebernoe Common and Midhurst. Caterpillars feed on Stitchworts.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU855219	A. Bradshaw;Julian Clarke	31/07/2004	West Sussex (VC13)

Eupithecia indigata

Ochreous Pug

Insect - moth

This small species is common nationally in areas with Pine trees, but in Sussex it is uncommon and is mostly found on pines growing on the heathlands of the Ashdown Forest and the West Sussex heaths. Caterpillars feed on pine trees.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850214	Anon @ Chichester NHS	11/04/2006 - 24/12/2006	Fitzhall Lodge, Iping
SU855218	Robin Storkey & Mike Perry	15/05/2004	Stedham Common
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI

Eupithecia inturbata

Maple Pug

Insect - moth

This nationally scarce (b) species is found predominantly in south east England favouring woods and scrub on the chalk. In Sussex it is found in sites scattered throughout the county and is quite widespread, but never common. Caterpillars feed on the flowers of Field Maple, but only on large trees.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850214	Anon @ Chichester NHS	11/04/2006 - 24/12/2006	Fitzhall Lodge, Iping
SU855218	Robin Storkey & Mike Perry	31/07/2004	Stedham Common
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI

Eupithecia pusillata

Juniper Pug

Insect - moth

This nationally common species occurs on moors and downs where Juniper grows. In Sussex it occurs on Wild Juniper on parts of the Downs of West Sussex. It has recently been recorded from garden Junipers in various parts of East Sussex. Caterpillars feed on Junipers.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850214	Anon @ Chichester NHS	11/04/2006 - 24/12/2006	Fitzhall Lodge, Iping

Eupithecia trisignaria

Triple-spotted Pug

Insect - moth

This species is widespread, but very local throughout England and Wales. In Sussex it is only known from Rewell Wood and adjacent downland in West Sussex. Caterpillars feed on the seeds of Wild Angelica and Hogweed.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU855218	Robin Storkey & Mike Perry	31/07/2004	Stedham Common

Hypomecis roboraria

Great Oak Beauty

Insect - moth

This nationally scarce (b) species occurs in ancient woodlands in central southern England. In Sussex it occurs in many of the mature woodlands, but is only regularly found in the mature woods around Petworth. Caterpillars feed on Oak.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	08/06/2007	Fitzhall Lodge, Iping
SU851218	Dave Green;Tony Davis;Penny Green	10/06/2014	Iping Common SWT Reserve
SU855218	Kay Bridger;Mike Bridger;Isobel Perry;Mike Perry;Robin Storkey	10/06/2007	Stedham Common
SU856219	Tony Davis	16/06/2007	Stedham Common

Idaea sylvestriaria

Dotted Border Wave

Insect - moth

A nationally scarce species of open heathy areas all over England, but only common on the heaths of south central England. In Sussex it is now only found in the Ashdown Forest in East Sussex and Ambersham and Iping Commons near Midhurst. Caterpillars are thought to feed on various low growing flowers.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850214	Anon @ Chichester NHS	11/04/2006 - 24/12/2006	Fitzhall Lodge, Iping
SU8521	Sarah Patton	31/07/2004	Stedham Common
SU855218	Kay Bridger;Mike Bridger;Isobel Perry;Mike Perry;Robin Storkey	11/07/2007	Stedham Common
SU855219	A. Bradshaw;Julian Clarke	31/07/2004	West Sussex (VC13)
SU856219	Tony Davis	16/06/2007	Stedham Common

Pachycnemia hippocastanaria

Horse Chestnut

Insect - moth

This nationally scarce (b) species is found on the heaths of central southern England. In Sussex it is found on Ashdown Forest in East Sussex and is scattered on the heathlands of West Sussex. Caterpillars feed on Heather and Cross-leaved Heath.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	31/10/2007	Fitzhall Lodge, Iping
SU8521	Andrew King	24/10/2012	West Sussex (VC13)
SU854219	Graeme Lyons	31/05/2012	Stedham Common SWT Reserve
SU855218	Kay Bridger;Mike Bridger;Robin Storkey	12/09/2007	Stedham Common
SU855219	A. Bradshaw;Julian Clarke	31/07/2004	West Sussex (VC13)
SU856219	Tony Davis	16/06/2007	Stedham Common
SU85652174	Robin Storkey	13/07/2003	Stedham Common

Perconia strigillaria

Grass Wave

Insect - moth

A nationally local species of heathland, commons and heathy woods all over UK, but only at all common around the New Forest and the Surrey heaths. In Sussex it is found all over Ashdown Forest in East Sussex and the northern heaths in West Sussex such as Ambersham Common, Lavington Common, Midhurst Common, Van Common and Iping Common. Caterpillars feed on Heathers, Broom and Petty Whin.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	08/06/2007	Fitzhall Lodge, Iping
SU851218	Dave Green;Tony Davis;Penny Green	10/06/2014	Iping Common SWT Reserve
SU8521	Andrew King	25/06/2013	Iping Common
SU854219	Graeme Lyons	31/05/2012	Stedham Common SWT Reserve
SU855218	Kay Bridger;Mike Bridger;Isobel Perry;Mike Perry;Robin Storkey	10/06/2007	Stedham Common
SU8561021751	Graeme Lyons	29/05/2009	Stedham & Iping Common SWT Reserve
SU856218	Mike Edwards;Peter Hodge	15/06/2003 - 07/09/2003	Stedham Common
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI
SU85652174	Robin Storkey	16/06/2003	Stedham Common

Philereme transversata

Dark UMBER

Insect - moth

This nationally local species occurs in chalky woodland and scrub in southern England. In Sussex it is fairly widespread, but uncommon along the whole of the Downs. Caterpillars feed on Buckthorn.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU855219	A. Bradshaw;Julian Clarke	31/07/2004	West Sussex (VC13)

Apoda limacodes

Festoon

Insect - moth

A nationally scarce (b) species of the older woodlands in south and east England. In Sussex it is widespread in most areas except the central parts. Ashdown Forest is the best site. Caterpillars feed on Oak.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	13/07/2007	Fitzhall Lodge, Iping
SU855218	Kay Bridger;Mike Bridger;Isobel Perry;Mike Perry;Robin Storkey	11/07/2007	Stedham Common
SU856219	Tony Davis	16/06/2007	Stedham Common

Plebejus argus

Silver-studded Blue

Insect - butterfly

A small blue butterfly now confined in Sussex to a few heathlands, particularly Ashdown Forest. In the past the form found in chalk and limestone habitats occurred on the South Downs. The silver-studded blue has undergone a severe decline in range this century, estimated at 80%. It has become extinct in Scotland and northern England, and throughout most of central, eastern and south-eastern England. This is mainly due to loss, fragmentation and inappropriate habitat management.

Designations

IUCN (2001) - Vulnerable; Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; Sussex Biodiversity Action Plan; Sussex Rare Species Inventory; UK Biodiversity Action Plan priority species; Wildlife and Countryside Act 1981 Schedule 5 Sections (9.5a; 9.5b)

Grid Reference	Recorder	Date	Locality
SU850218	Neil Hulme	16/06/2009	West Sussex (VC13)
SU851218	Paul Callaway	20/06/2004	Iping Common
SU8521	Colin Knight	29/06/2013	Iping and Stedham Commons
SU852217	Sophie-May Lewis	23/06/2012	Stedham Common
SU853219	Peter Gay; Joyce Gay	06/07/2003	Stedham Common, Midhurst
SU854217	Peter Atkinson	08/07/2005	Stedham
SU855217	Robin Crane	15/06/1997	Stedham & Iping Common SWT Reserve
SU855218	Neil Hulme	28/06/2013	Stedham Common
SU855219	Sue Berrisford	27/06/2006	Stedham Common
SU856218	Peter Atkinson	11/07/2006	Stedham Common
SU8565621753	Graeme Lyons	29/05/2009	Stedham & Iping Common SWT Reserve
SU857217	B. Taylor	27/06/2008	Stedham Common
SU857218	Alice Parfitt	24/06/2006	Stedham Common
SU857219	Andrew Guest	10/07/2004	Iping & Stedham Commons
SU858218	B. Taylor	28/06/2007	Stedham Common

Chilodes maritimus

Silky Wainscot

Insect - moth

A nationally local species found in reedbeds in south east England, East Anglia, south Wales and south Scotland. In Sussex it is widespread along the East Sussex coast and in parts of West Sussex including Chichester and Pagham Harbours. Caterpillars feed on Common Reed.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	18/07/2007	Fitzhall Lodge, Iping

Conistra rubiginea

Dotted Chestnut

Insect - moth

This nationally scarce (b) species is found in most of southern England and south Wales in heathland, woodland and hedgerows. In Sussex it is fairly widespread west of Storrington, but has not been recorded in East Sussex. Caterpillars feed on Apple and probably other trees.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	02/04/2007	Fitzhall Lodge, Iping
SU856219	John Radford; Rosemary Radford	1995	Stedham and Iping Commons SSSI

Elaphria venustula

Rosy Marbled

Insect - moth

A nationally scarce (b) species of heathy woodlands in south east England. In Sussex it has increased and is now very widespread in woodlands throughout the county. Caterpillars are thought to feed on the flowers of Tormentil and Creeping Cinquefoil.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850214	Anon @ Chichester NHS	11/04/2006 - 24/12/2006	Fitzhall Lodge, Iping
SU851218	Dave Green;Tony Davis;Penny Green	10/06/2014	Iping Common SWT Reserve
SU855218	Kay Bridger;Mike Bridger;Isobel Perry;Mike Perry;Robin Storkey	10/06/2007	Stedham Common
SU856219	Tony Davis	16/06/2007	Stedham Common

Orthosia miniosa

Blossom Underwing

Insect - moth

This species is local nationally and occurs in Oak woodlands and old Oaks in hedgerows. In Sussex it is widespread in West Sussex, but rare in East Sussex with recent records coming from a few scattered sites.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	23/04/2007	Fitzhall Lodge, Iping

Polia trimaculosa

Silvery Arches

Insect - moth

A nationally scarce (b) species of heathy woods and moorland of Scotland and Surrey. In Sussex it is now known from Beckley Woods near Rye, the Ashdown Forest and many of the West Sussex heaths. Caterpillars feed on various shrubs.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856219	John Radford;Rosemary Radford	1995	Stedham and Iping Commons SSSI

Meganola albula

Kent Black Arches

Insect - moth

This nationally scarce (b) species occurs in open habitats on and near the coast in the southern half of England. In Sussex it is fairly widespread within 5 or 6 miles of the coast. Caterpillars feed on Dewberry.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850214	Mike Bridger	10/07/2007	Fitzhall Lodge, Iping

Meganola strigula

Small Black Arches

Insect - moth

This tiny nationally scarce (a) species occurs in mature woodland in central southern England. In Sussex it occurs in several of the ancient woods around Ebernoe and Petworth in West Sussex and Plashett Wood, Abbot's Wood and Hollington, Hastings in East Sussex. Caterpillars feed on Pedunculate Oak.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850214	Anon @ Chichester NHS	11/04/2006 - 24/12/2006	Fitzhall Lodge, Iping

Ptilodon cucullina

Maple Prominent

Insect - moth

A nationally local species of woods, mostly on the chalk. It is found mostly in southern and eastern England, but is expanding its range. In Sussex it is found in woods on the Downs west of Arundel and in woods between Battle and Rye in the east of East Sussex. Caterpillars feed on Field Maple.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Sarah Patton	16/08/2003	Stedham Common
SU855218	Kay Bridger;Mike Bridger;Isobel Perry;Mike Perry;Robin Storkey	11/07/2007	Stedham Common
SU856219	Tony Davis	16/06/2007	Stedham Common

Apatura iris

Purple Emperor

Insect - butterfly

Much rarer today than in the past, this swallow-feeding woodland butterfly has shown some signs of recovery in recent years. Currently widespread nationally, but rare in West Sussex.

Designations

IUCN (2001) - Lower risk - near threatened; Sussex Rare Species Inventory; Wildlife and Countryside Act 1981 Schedule 5 Sections (9.5a; 9.5b)

Grid Reference	Recorder	Date	Locality
SU852217	John Hodgson	02/07/2009	Stedham Common
SU852219	Andrew Guest	10/07/2004	Iping & Stedham Commons

Hipparchia semele

Grayling

Insect - butterfly

Once widespread over the downs, now restricted to one valley near Wilmington. This species can occasionally be found in the far north-west of Sussex however this represents over-flow from Hampshire populations as opposed to an established Sussex colony.

Designations

IUCN (2001) - Vulnerable; Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; Sussex Biodiversity Action Plan; Sussex Rare Species Inventory; UK Biodiversity Action Plan priority species

Grid Reference	Recorder	Date	Locality
SU856218	E C M Haes	January 1984 - July 1985	Stedham Common

Capperia britanniodactyla

Wood-sage Plume

Insect - moth

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856219	John Radford;Rosemary Radford	1975 - 1995	Stedham and Iping Commons SSSI

Elegia similella

White-barred Knot-horn

Insect - moth

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU855218	Kay Bridger;Mike Bridger;Isobel Perry;Mike Perry;Robin Storkey	10/06/2007	Stedham Common

Pempelia genistella

Gorse Knot-horn

Insect - moth

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Sarah Patton	31/07/2004	Stedham Common

Synanthedon culiciformis

Large Red-belted Clearwing

Insect - moth

This nationally scarce (b) species flies by day and looks like a fly. It inhabits light woodland and heaths with Birch all over UK. In Sussex it is widespread in East Sussex, but rare in West Sussex with Arundel and Iping and Ambersham Common being the only known sites. Caterpillars feed internally on Birch.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8557021919	Graeme Lyons	12/05/2009	Stedham & Iping Common SWT Reserve
SU856219	John Radford;Rosemary Radford	1975 - 1995	Stedham and Iping Commons SSSI

Ceriagrion tenellum

Small Red Damselfly

Insect - dragonfly (Odonata)

A damselfly confined heathland bogs and pools, usually those edged with Sphagnum moss. In Sussex its main stronghold is Ashdown Forest, but it has also been recorded from the Liphook, Pulborough, West Chiltington and Black Down areas in West Sussex and south east of Tunbridge Wells in East Sussex. Elsewhere very local in south-western and southern-central England and Wales.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Mike Edwards;Peter Hodge	15/06/2003 - 07/09/2003	West Sussex (VC13)

Cordulia aenea

Downy Emerald

Insect - dragonfly (Odonata)

A dragonfly of nutrient-poor tree-lined or woodland ponds, lakes, canals, slow-flowing rivers and streams. Thinly but widely scattered across our area. Elsewhere it is a scarce species and southern and south eastern England are its main strongholds in the British Isles.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850217	J & M Halls	28/05/1989	West Sussex (VC13)
SU8521	Graeme Lyons;Kevin Lerwill	28/06/2010	Iping and Stedham Commons

Orthetrum coerulescens

Keeled Skimmer

Insect - dragonfly (Odonata)

A dragonfly of acid pools, streams and ditches. In Sussex it is rare and mainly recorded from Ashdown Forest though occasionally reported in other places. Elsewhere in the British Isles it is locally common in suitable areas mainly in the west.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850217	Dorian Mason	04/08/2013	Iping Common SWT Reserve
SU851216	Dave Sadler	20/08/2005	Fitzhall Scrapes, Iping Common

Sympetrum danae

Black Darter

Insect - dragonfly (Odonata)

A largely northern dragonfly that breeds in well-vegetated, shallow, acidic pools. Rare in Sussex where it is found mainly in Ashdown Forest and greensand heaths around Midhurst. Widespread in north and west Britain and on southern heathlands.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850217	Dorian Mason	04/08/2013	Iping Common SWT Reserve
SU85022163	Graeme Lyons;Shaun Pryor	01/08/2013	Iping Common SWT Reserve
SU8503421734	Su Reed	30/07/2014	Iping Common West Sussex
SU856216	David Chelmick	1973	West Sussex (VC13)

Omocestus rufipes

Woodland Grasshopper

Insect - orthopteran**Designations**

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU85402194	Graeme Lyons;Mike Edwards	26/08/2010	Stedham Common SWT Reserve
SU856218	Mike Edwards;Peter Hodge	15/06/2003 - 07/09/2003	Stedham Common

Conocephalus fuscus

Long-winged Cone-head

Insect - orthopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Mike Edwards;Peter Hodge	15/06/2003 - 07/09/2003	West Sussex (VC13)

Metrioptera brachyptera

Bog Bush-cricket

Insect - orthopteran

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Mike Edwards;Peter Hodge	15/06/2003 - 07/09/2003	West Sussex (VC13)
SU854217	Graeme Lyons;Mike Edwards	26/08/2010	Stedham Common SWT Reserve
SU856218	Mike Edwards;Peter Hodge	15/06/2003 - 07/09/2003	Stedham Common

Arvicola amphibius

European Water Vole

Terrestrial mammal

The fastest declining native British mammal, the water vole was 'Ratty' in Wind in the Willows. Water voles prefer slow flowing streams, rivers and dykes with steep earth banks and luxuriant emergent vegetation. They have been in decline for over a century mainly due to loss of habitat while the presence of American mink has greatly hastened this decline. In many areas of mainland Britain water voles are already extinct but there are still some strong populations in Sussex. A legally protected species, listed on the Sussex Rare Species Inventory and the subject of a Sussex Species Action Programme.

Designations

Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; Sussex Biodiversity Action Plan; Sussex Protected Species Register; Sussex Rare Species Inventory; UK Biodiversity Action Plan priority species; Wildlife and Countryside Act 1981 Schedule 5 Sections (9.1 killing/injuring; 9.1 taking; 9.2; 9.4; subdivision a; 9.4b; 9.5a; 9.5b; Schedule 5)

Grid Reference	Recorder	Date	Locality
SU856219	Andrew Tittensor	1970 - 1975	Stedham and Iping Commons SSSI

*Cladonia cervicornis subsp.
cervicornis*

Lichen

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Bruce Middleton;Jacqui Middleton	April 2008 - February 2009	Iping, Stedham and Trotton Commons

Cladonia cervicornis subsp. verticillata

Lichen

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU851218	Francis Rose	1987	Stedham and Iping Commons SSSI

Cladonia glauca

Lichen

A lichen that is widespread in the British Isles on heathland soils and old tree stumps mainly in the east. In our area known from a few West Sussex commons and formerly from The Crumbles, Eastbourne, and Bexhill in East Sussex. 1889-1991.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Francis Rose	1991	Iping and Trotton Commons

Cladonia subulata

Lichen

A lichen of sandy ground on heaths, dunes and sandrocks and in sandpits. Recorded from a number of sites in East and West Sussex. Widespread and often frequent elsewhere in Britain. 1950-2001.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Bruce Middleton; Jacqui Middleton	April 2008 - February 2009	Iping, Stedham and Trotton Commons

Pycnothelia papillaria

Lichen

A lichen of acid peat and leached sandy soils on heathlands. Mainly in north western Scotland, but locally frequent elsewhere in Britain. In our area recorded from heathy commons in both East and West Sussex. 1900-1991.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850218	Francis Rose	1991	Iping Common
SU8521	Francis Rose	1987	Iping and Trotton Commons

Cetraria muricata

Lichen

A lichen found mainly on heathland but also on mossy sandrocks, shingle beaches and old tree trunks. Recorded in our area from Iping, Ambersham and Lavington Commons in West Sussex. Locally abundant in other parts of the British Isles. 1950-1991.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Francis Rose	1970 - 1991	Iping and Trotton Commons

Peltigera canina

Lichen

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Caroline Hallam	August 1982	Stedham Common

Cordyceps militaris

Scarlet Caterpillarclub

Fungus

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Angela Davis	30/09/2007	Iping and Stedham Common

Tephrocybe atrata

Fungus

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	David Randall;Mike Goodchild	27/10/1991	Stedham Common

Pholiota adiposa

Fungus

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Chichester Natural H Society	09/10/1994	Stedham Common

Collybia erythropus

Redleg Toughshank

Fungus

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Pat Leonard	13/09/1997	Stedham Common

Boletus parasiticus

Fungus

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	David Randall;Mike Goodchild	27/10/1991	Stedham Common

Boletus pruinaus

Matt Bolete

Fungus

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8523621995	Jonathan Need	19/09/2010	West Sussex (VC13)

Leccinum holopus

Ghost Bolete

Fungus

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Pat Leonard	13/09/1997	Stedham Common

Hygrophoropsis aurantiaca

False Chanterelle

Fungus

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Chichester Natural H Society	09/10/1994	Stedham Common
SU8523621995	Nick Aplin	19/09/2010	West Sussex (VC13)
SU856218	Pat Leonard	13/09/1997	Stedham Common

Geastrum lageniforme

Flask Earthstar

Fungus

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850215	Mike Goodchild	07/11/1999 - 20/11/1999	West Sussex (VC13)

Ischnoderma benzoinum

Benzoin Bracket

Fungus

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Paul Cook	16/03/1996	Stedham Common

Skeletocutis amorpha

Fungus

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Ron Davis	30/09/2007	Iping and Stedham Common
SU856218	Paul Cook	16/03/1996	Stedham Common

Trametes hirsuta

Hairy Bracket

Fungus

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Shelley Evans	16/03/1996	Stedham Common

Lactarius pubescens

Bearded Milkcap

Fungus

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Chichester Natural H Society	09/10/1994	Stedham Common
SU856218	David Randall;Mike Goodchild	27/10/1991	Stedham Common

Thelephora terrestris f. resupinata

Fungus

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Pat Leonard	13/09/1997	Stedham Common

Calypogeia sphagnicola

Bog Pouchwort

Liverwort

A small liverwort that creeps across beds of Sphagnum moss. Mainly lowland and widespread in Britain where conditions are suitable. Recorded in the last fifty years from several commons in West Sussex and Ashdown Forest in East Sussex.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850217	Tom Ottley	26/09/2014	West Sussex (VC13)

Cladopodiella francisci

Holt Notchwort

Liverwort

A liverwort of wet, peaty ground on heaths. Found mainly in southern and western England and rare elsewhere in the British Isles. Recorded in our area from two West Sussex commons in the 1980s and from Ashdown Forest in East Sussex before 1908.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU85432176	Tom Ottley	29/09/2014	West Sussex (VC13)

Lophocolea bispinosa

Great Crestwort

Liverwort

An introduced species from Australasia first recorded in the British Isles in 1963. Found mostly on soil, banks or rocks in open and shaded places. Recorded in our area from Midhurst Common in West Sussex in 1993.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU854219	H.W. Wallis	27/08/2009	West Sussex (VC13)

Sphagnum molle

Blushing Bog-moss

Moss

A medium-sized Sphagnum, usually compact with a pink colour, growing in wet heathland and the drier parts of bogs. An uncommon species in Britain, and rare in southern England. Confined in our area to a few sites in Ashdown Forest, East Sussex.

Designations

Habitats Directive Annex 5; Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU854217	Recorder @ BBS Southern Group; Tom Ottley; J. Norton	09/11/2014	West Sussex (VC13)

Sphagnum russowii

Russow's Bog-moss

Moss

A bog-moss that is frequent to common from Wales northwards, especially at higher altitudes. Rare in southern England. In our area recorded only from Stedham, Iping and Trotton Commons, all in West Sussex and thought to be extinct by 1951, but subsequently found there in the 1970s and 1980s.

Designations

Habitats Directive Annex 5; Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Francis Rose	16/09/1951 - 27/02/1954	Stedham Common
SU856219	Anon @ EN - S.E. Region	1970	Stedham and Iping Commons SSSI

Dryopteris aemula

Hay-scented Buckler-fern

Fern

In the Weald a fern of in deep, steep-sided wooded gills. Very rare in West Sussex but locally frequent in the High Weald area of East Sussex. This species is one for which Britain has special responsibility.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Caroline Hallam	August 1982	Stedham Common

Lycopodiella inundata

Marsh Clubmoss

Clubmoss

A clubmoss of wet, bare, peaty or sandy margins of lakes, pools, flushes and trackways. Declining nationally, but known from several sites heathland sites in East and West Sussex.

Designations

IUCN (2001) - Endangered; Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; Sussex Biodiversity Action Plan; Sussex Rare Species Inventory; UK Biodiversity Action Plan priority species

Grid Reference	Recorder	Date	Locality
SU8521	Francis Rose	14/10/1994	Stedham Common
SU85432177	Graeme Lyons;James Power;Jane Willmott	30/05/2012	Stedham Common SWT Reserve
SU85452178	Graeme Lyons;Mark Gurney;Adrian Holloway	05/06/2014	Stedham Common SWT Reserve
SU856218	Anon @ Sussex Bot. Rec. Soc.;Francis Rose	1994	Stedham Common
SU856219	Anon @ EN - S.E. Region	1970	Stedham and Iping Commons SSSI
SU857217	Jacqui Middleton	12/08/2001	Stedham Common

Pimpinella major

Greater Burnet-saxifrage

Flowering plant

A perennial mainly of basic soils on roadsides, hedge banks, railway banks and wood edges. In the first half of the 20th century this plant was locally common in Kent and Surrey, but rare in Sussex. Currently known from one site only in East Sussex.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Caroline Hallam	August 1982	Stedham Common

Dactylorhiza incarnata subsp. pulchella

Early Marsh-Orchid

Flowering plant**Designations**

EC CITES Annex B; Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856219	Paul Harmes	1988	Stedham and Iping Commons SSSI

Chamaemelum nobile

Chamomile

Flowering plant

The decline in many parts of Britain of this species of heaths and commons became apparent towards the end of the last century. The plant still occurs in both East and West Sussex on greens, cricket fields and closely mown unimproved turf and may increase in response to pony grazing.

Designations

IUCN (2001) - Vulnerable; Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec; Sussex Biodiversity Action Plan; Sussex Rare Species Inventory; UK Biodiversity Action Plan priority species

Grid Reference	Recorder	Date	Locality
SU855219	E C M Haes;George Bishop;Betty Bishop	1984 - 1985	Stedham Common
SU857218	C R Hall;Heather Winship	21/08/1997	Stedham Common
SU857219	Anon @ Sussex Bot. Rec. Soc.;;Nick Sturt	1993	West Sussex (VC13)
SU8575221907	Dawn Nelson	16/07/2008	Stedham Common

Filago minima

Small Cudweed

Flowering plant

An annual of a wide range of dry, open habitats. Although still widely scattered in many of the sandy areas of West Sussex, this plant has much decreased in East Sussex with only one recent record from a roadside at the edge of Ashdown Forest.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Graeme Lyons;Kevin Lerwill	28/06/2010	Iping and Stedham Commons

Narthecium ossifragum

Bog Asphodel

Flowering plant

A perennial of open wet heaths, bogs and flushes, especially where there is some water movement. Although still widespread in Ashdown Forest, and currently recorded from two locations in West Sussex, this species has disappeared from many locations elsewhere.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Francis Rose	12/07/1986	Stedham Common

Eriophorum vaginatum

Hare's-tail Cottongrass

Flowering plant

A tussock-forming perennial of wet heaths and mires is restricted to West Sussex, not having been seen in East Sussex since the mid-19th century and only recorded there from Chailey Common in the 1850s.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU850217	Anon @ Sussex Bot. Rec. Soc.;;Frances Abraham	1995	Iping Common
SU8507821708	Dawn Nelson	08/06/2009	West Sussex (VC13)
SU856218	Bruce Middleton;Jacqui Middleton	April 2008 - February 2009	Iping, Stedham and Trotton Commons
SU856219	Francis Rose	1975	Stedham and Iping Commons SSSI
SU857216	Francis Rose	1991 - 1992	Stedham Common

Rhynchospora alba

White Beak-sedge

Flowering plant

A perennial of base-poor acidic bogs, wet heaths and mires, often in association with Sphagnum. Currently recorded in our area from a few West Sussex commons and Ashdown Forest in East Sussex.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Francis Rose	28/08/1993	Stedham Common
SU8542521777	Graeme Lyons;Bruce Middleton	10/07/2008	Stedham & Iping Common SWT Reserve
SU85442178	Graeme Lyons;Adrian Holloway;Dave Green;Penny Green	08/07/2014	Stedham Common SWT Reserve
SU856218	Bruce Middleton;Jacqui Middleton	April 2008 - February 2009	Iping, Stedham and Trotton Commons

Agrostis curtisii

Bristle Bent

Flowering plant

This delicate grass is restricted to two sites on Iping and Trotton Commons in West Sussex. Long extinct in East Sussex.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU8521	Francis Rose	14/10/1994	Stedham Common

Calamagrostis epigejos

Wood Small-reed

Flowering plant

A perennial grass, this species has always had its stronghold in the far west of the county. Favouring wet woods, ditches and marshes, it has only very limited populations in East Sussex.

Designations

Sussex Rare Species Inventory

Grid Reference	Recorder	Date	Locality
SU856218	Bruce Middleton;Jacqui Middleton	April 2008 - February 2009	Iping, Stedham and Trotton Commons

SUSSEX INVASIVE ALIEN SPECIES REPORT

The Sussex Invasive Alien Species Report is produced in order to help minimise the threat posed by invasive alien species in Sussex. Records are labelled so that only one record per species per grid reference is included - this will usually be the most up to date record.

Most alien species pose no threat to native species, and indeed many naturalised non-natives represent important additions to our flora and fauna. An older record of an alien invasive species may denote that there was once a problem at this site, but it has subsequently been dealt with. However, the problem may still persist but no up to date information is available.

What is an Invasive Alien Species?

The term alien is synonymous with the term non-native. An invasive alien is defined as an alien species whose introduction and/or spread threatens biological diversity. Invasive alien species are referred to by several names, which are often used interchangeably: non-natives, introduced, non-indigenous, exotic, foreign, noxious, aggressive, pest or harmful species.

What's the problem?

With no natural predators and a benign climate, invasive alien species can out-compete our native plant and animal species. For example, some invasive alien plants species can change light levels, decrease dissolved oxygen in water, change soil chemistry and its structure, and increase surface run-off and soil erosion. On a more subtle level, invasive alien species can affect ecosystem processes such as nutrient cycling, pollination and regeneration of soils. Invasive fauna can compete with native species, displace them, consume them, act as parasites or transmit diseases, reduce growth and survival rates, cause the decline or extinction of local populations or even entire species.

What control is in place?

Section 14 of The Wildlife and Countryside Act (1981) is the principal legislation dealing with the release of non-native species. This has been amended by the Natural Environment and Rural Communities (NERC) Act (2006) in England and Wales. Section 14 of the Act makes it illegal to allow any animal which is not ordinarily resident in Great Britain, or is listed on Schedule 9 of the Act, to escape into the wild, or to release it into the wild. It is also illegal to plant or otherwise cause to grow in the wild any plant listed on Schedule 9 of the Act.

What to do if there is an invasive alien species on your site

If you have any of the species listed in this report on your site, firstly investigate the recommended control for the particular species. You can search by species name on the [GB non-native species secretariat website](#) for further advice.

If there are invasive alien species at your site that are not in this report please contact us on sxbrc@sussexwt.org.uk or 01273 497521 so that we can update our database.

SUSSEX INVASIVE ALIEN SPECIES REPORT

Please note that bird records are not included in this report.

Land at public footpath 907, Minsted

22 June 2015 ESD/15/441 Search Area: SU8521

Alec Fry (Minsted Residents Group)

Harmonia axyridis

Harlequin Ladybird

Insect - beetle (Coleoptera)

A native of the Far East this was first recorded in Britain in 2004 and in Sussex near Icklesham in May 2005; widespread in East and West Sussex by 2006. It is larger and more voracious than our native ladybirds and may compete with them and attack other invertebrates. Can also damage fruit and be a nuisance when hibernating in large aggregations in houses.

Grid Reference	Recorder	Date	Locality
SU850217	Peter Hodge	13/06/2007	Stedham/Iping Commons, Iping Common, Area 3
SU854218	Peter Hodge	17/08/2007	Area 2, Stedham Common

Muntiacus reevesi

Chinese Muntjac

Terrestrial mammal

Listed on Schedule 9 of the Wildlife and Countryside Act 1981. A small Chinese species of deer that has considerable impact on coppice regrowth, and tree seedlings. Muntjac may also damage bluebells and wild orchids and they are thought to compete with native roe deer. It is on Schedule 9 of the Wildlife and Countryside Act 1981 which prevents release into areas from which they are currently absent. Widespread in Sussex.

Grid Reference	Recorder	Date	Locality
SU856219	Andrew Tittensor	1970 - 1975	Stedham and Iping Commons SSSI

Neovison vison

American Mink

Terrestrial mammal

A member of the weasel family introduced in the 1920s for the fur trade and now found in the wild in much of Britain. Mink take bird's eggs and chicks and have caused a serious decline in water voles. They also damage fisheries and poultry farms. Attempts to control them are usually ongoing.

Grid Reference	Recorder	Date	Locality
SU856219	Andrew Tittensor	1970 - 1975	Stedham and Iping Commons SSSI

Campylopus introflexus

Heath Star Moss

Moss

A now widespread moss introduced from the Southern Hemisphere. First British record was from Heath Common, Sullington in 1941. Tends to overwhelm native moss species and now very widespread in Sussex.

Grid Reference	Recorder	Date	Locality
SU8521	G. Lyons;K. Lerwill	28/06/2010	Iping and Stedham Commons, West Sussex (VC13)
SU856218	Bruce Middleton;Jacqui Middleton	April 2008 - February 2009	Stedham Common, Iping, Stedham and Trotton Commons

Crocsmia pottsii x aurea = *C. x crocosmiiflora*

Montbretia

Flowering plant

A well-known garden escape with orange flowers from South Africa. Widespread across Sussex. Listed on Schedule 9 of the Wildlife & Countryside Act 1981.

Grid Reference	Recorder	Date	Locality
SU856218	Bruce Middleton;Jacqui Middleton	April 2008 - February 2009	Stedham Common, Iping, Stedham and Trotton Commons

Fallopia japonica

Japanese Knotweed

Flowering plant

Listed on Schedule 9 Part II of the Wildlife & Countryside Act (1981). It is an offence to plant or otherwise cause to grow the species in the wild. Described as the most pernicious weed in Britain by Plantlife, Japanese knotweed was introduced in the UK in the mid-19th century as an ornamental plant. It is now a problem invasive perennial throughout Europe. It is an offence to plant, or otherwise cause to grow, the species in the wild. Landowners are liable to prosecution if they allow the plant to spread from their land.

Grid Reference	Recorder	Date	Locality
SU856218	Bruce Middleton;Jacqui Middleton	April 2008 - February 2009	Stedham Common, Iping, Stedham and Trotton Commons

Rhododendron ponticum

Rhododendron

Flowering plant

A naturalised, purple-flowered shrub introduced in 1763. Most UK plants derive from Spanish stock. A highly invasive species that suppresses native vegetation and its associated flora and fauna.

Grid Reference	Recorder	Date	Locality
SU85292187	Ben Benatt	09/07/2004	Stedham Common - W16a (Pinus), Stedham Common W16a (Pinus)
SU8560021711	Bruce Middleton;Jacqui Middleton	April 2008 - February 2009	Area 10 - NVC Community M16a, Iping, Stedham and Trotton Commons
SU856218	Bruce Middleton;Jacqui Middleton	April 2008 - February 2009	Stedham Common, Iping, Stedham and Trotton Commons
SU85802189	Ben Benatt	09/07/2004	Stedham Common - W16a (Pinus), Stedham Common W16a (Pinus)
SU85832193	Ben Benatt	09/07/2004	Stedham Common - W16a (Pinus), Stedham Common W16a (Pinus)
SU85852164	Ben Benatt	09/07/2004	Stedham Common - W16a (Pinus), Stedham Common W16a (Pinus)

FULL SPECIES LIST (Excluding Birds)

Land at public footpath 907, Minsted

22 June 2015 ESD/15/441 Search Area: SU8521
Alec Fry (Minsted Residents Group)

Latin Name	Common Name	Taxon Group	First Date	Last Date	No. of Rec's
<i>Hypomecis punctinalis f. humperti</i>	Pale Oak Beauty form humperti		24/05/2007	-	2
<i>Hypomecis roboraria f. infuscata</i>	Pale Oak Beauty form infuscata		17/05/2007	-	2
<i>Alcis repandata f. conversaria</i>	Mottled Beauty form conversaria		24/12/2006	14/06/2007	4
<i>Calliteara pudibunda f. concolor</i>	Pale Tussock form concolor		23/04/2007	02/06/2007	18
<i>Arcyria cinerea</i>		slime mould	16/03/1996	-	1
<i>Arcyria pomiformis</i>		slime mould	16/03/1996	-	1
<i>Arcyria incarnata</i>		slime mould	09/10/1994	-	1
<i>Paradiacheopsis solitaria</i>		slime mould	16/03/1996	-	1
<i>Stemonitis fusca</i>		slime mould	16/03/1996	-	1
<i>Licea parasitica</i>		slime mould	16/03/1996	-	1
<i>Fuligo septica</i>		slime mould	30/09/2007	-	1
<i>Leocarpus fragilis</i>		slime mould	16/03/1996	-	1
<i>Collaria elegans</i>		slime mould	16/03/1996	-	1
<i>Leccinum scabrum</i>	Brown Birch Bolete	fungus	13/09/1997	19/09/2010	2
<i>Clavulina coralloides</i>	Crested Coral	fungus	30/09/2007	-	1
<i>Cantharellus tubaeformis</i>	Trumpet Chanterelle	fungus	31/10/1993	-	1
<i>Cantharellus cibarius</i>	Chanterelle	fungus	21/06/1997	19/09/2010	3
<i>Suillus variegatus</i>	Velvet Bolete	fungus	31/10/1993	-	1
<i>Suillus luteus</i>	Slippery Jack	fungus	13/09/1997	30/09/2007	2
<i>Suillus bovinus</i>	Bovine Bolete	fungus	31/08/1982	19/09/2010	7
<i>Scleroderma verrucosum</i>	Scaly Earthball	fungus	30/09/2007	-	1
<i>Scleroderma citrinum</i>	Common Earthball	fungus	31/08/1982	30/09/2007	6
<i>Paxillus involutus</i>	Brown Rollrim	fungus	28/10/1990	19/09/2010	8
<i>Hygrophoropsis aurantiaca</i>	False Chanterelle	fungus	28/10/1990	19/09/2010	4
<i>Gomphidius roseus</i>	Rosy Spike	fungus	13/09/1997	-	1
<i>Gomphidius glutinosus</i>	Slimy Spike	fungus	31/10/1993	-	1
<i>Clavulina rugosa</i>	Wrinkled Club	fungus	09/10/1994	-	1
<i>Leccinum variicolor</i>	Mottled Bolete	fungus	27/10/1991	-	2

Latin Name	Common Name	Taxon Group	First Date	Last Date	No. of Rec's
<i>Hyphodontia subalutacea</i>		fungus	16/03/1996	-	1
<i>Leccinum versipelle</i>	Orange Birch Bolete	fungus	28/10/1990	13/09/1997	3
<i>Schizopora paradoxa</i>	Split Porecrust	fungus	16/03/1996	30/09/2007	2
<i>Piptoporus betulinus</i>	Birch Polypore	fungus	31/08/1982	30/09/2007	7
<i>Phaeolus schweinitzii</i>	Dyer's Mazegill	fungus	28/10/1990	30/09/2007	7
<i>Laetiporus sulphureus</i>	Chicken of the Woods	fungus	16/03/1996	19/09/2010	3
<i>Ischnoderma benzoinum</i>	Benzoin Bracket	fungus	31/10/1993	16/03/1996	2
<i>Antrodia xantha</i>		fungus	09/10/1994	-	1
<i>Vuilleminia comedens</i>	Waxy Crust	fungus	16/03/1996	-	1
<i>Phellinus ferreus</i>	Cinnamon Porecrust	fungus	30/09/2007	-	1
<i>Phallus impudicus</i>	Common Stinkhorn	fungus	31/08/1982	-	1
<i>Hydnum repandum</i>	Wood Hedgehog	fungus	28/10/1990	31/10/1993	2
<i>Boletus edulis</i>	Cep	fungus	27/10/1991	19/09/2010	5
<i>Hyphodontia sambuci</i>	Elder Whitewash	fungus	30/09/2007	-	1
<i>Leccinum roseofractum</i>	Blushing Bolete	fungus	13/09/1997	-	1
<i>Hymenochaete rubiginosa</i>	Oak Curtain Crust	fungus	30/09/2007	-	1
<i>Coltricia perennis</i>	Tiger's Eye	fungus	31/10/1993	30/09/2007	3
<i>Geastrum triplex</i>	Collared Earthstar	fungus	16/03/1996	30/09/2007	4
<i>Geastrum lageniforme</i>	Flask Earthstar	fungus	20/11/1999	-	1
<i>Phallus impudicus var. impudicus</i>	Stinkhorn	fungus	19/09/2010	-	1
<i>Clitocybe nebularis</i>	Clouded Funnel	fungus	28/10/1990	31/10/1993	2
<i>Lepista panaeolus</i>		fungus	19/09/2010	-	1
<i>Lepista nuda</i>	Wood Blewit	fungus	09/10/1994	04/12/2013	2
<i>Lepista flaccida</i>	Tawny Funnel	fungus	09/10/1994	-	1
<i>Collybia erythropus</i>	Redleg Toughshank	fungus	13/09/1997	-	1
<i>Collybia dryophila</i>	Russet Toughshank	fungus	21/06/1997	13/09/1997	2
<i>Collybia confluens</i>	Clustered Toughshank	fungus	13/09/1997	-	1
<i>Boletus parasiticus</i>		fungus	01/09/1991	27/10/1991	2
<i>Clitocybe vibecina</i>	Mealy Funnel	fungus	27/10/1991	-	2
<i>Tricholoma fulvum</i>	Birch Knight	fungus	13/09/1997	19/09/2010	2
<i>Clitocybe cerussata</i>		fungus	28/10/1990	-	1
<i>Psilocybe strictipes</i>		fungus	30/09/2007	-	1
<i>Psilocybe semilanceata</i>	Magic Mushroom	fungus	28/09/2013	-	1
<i>Psilocybe montana</i>	Mountain Brownie	fungus	16/03/1996	-	1
<i>Pholiota squarrosa</i>	Shaggy Scalycap	fungus	27/10/1991	09/10/1994	3
<i>Pholiota highlandensis</i>	Bonfire Scalycap	fungus	31/10/1993	-	1
<i>Collybia cirrhata</i>	Piggyback Shanklet	fungus	27/10/1991	-	2
<i>Boletus calopus</i>	Bitter Beech Bolete	fungus	31/08/1982	-	1
<i>Chalciporus piperatus</i>	Peppery Bolete	fungus	09/10/1994	-	1
<i>Boletus subtomentosus</i>	Suede Bolete	fungus	28/10/1990	09/10/1994	2
<i>Boletus rubellus</i>	Ruby Bolete	fungus	19/09/2010	-	1
<i>Boletus pruinatus</i>	Matt Bolete	fungus	19/09/2010	-	1
<i>Postia rennyi</i>		fungus	16/03/1996	-	1
<i>Boletus luridus</i>	Lurid Bolete	fungus	28/10/1990	-	1

Latin Name	Common Name	Taxon Group	First Date	Last Date	No. of Rec's
<i>Myxomphalia maura</i>		fungus	31/10/1993	-	1
<i>Boletus chrysenteron</i>	Red Cracking Bolete	fungus	27/10/1991	19/09/2010	3
<i>Tricholoma columbetta</i>	Blue Spot Knight	fungus	31/10/1993	-	1
<i>Boletus badius</i>	Bay Bolete	fungus	28/10/1990	19/09/2010	9
<i>Panaeolus fimicola</i>	Turf Mottlegill	fungus	30/09/2007	-	1
<i>Panaeolus acuminatus</i>	Dewdrop Mottlegill	fungus	09/10/1994	-	1
<i>Typhula quisquiliaris</i>	Bracken Club	fungus	30/09/2007	-	1
<i>Tricholomopsis rutilans</i>	Plums and Custard	fungus	31/10/1993	09/10/1994	2
<i>Tricholoma lascivum</i>	Aromatic Knight	fungus	30/09/2007	-	1
<i>Leccinum holopus</i>	Ghost Bolete	fungus	13/09/1997	-	1
<i>Phlebia tremellosa</i>	Jelly Rot	fungus	09/10/1994	-	1
<i>Russula nigricans</i>	Blackening Brittlegill	fungus	19/09/2010	-	1
<i>Stereum hirsutum</i>	Hairy Curtain Crust	fungus	28/10/1990	30/09/2007	5
<i>Stereum gausapatum</i>	Bleeding Oak Crust	fungus	28/10/1990	-	1
<i>Russula xerampelina</i>	Crab Brittlegill	fungus	31/08/1982	-	1
<i>Russula virescens</i>	Greencracked Brittlegill	fungus	31/08/1982	-	1
<i>Russula sardonina</i>	Primrose Brittlegill	fungus	27/10/1991	19/09/2010	4
<i>Russula queletii</i>	Fruity Brittlegill	fungus	13/09/1997	-	1
<i>Gloeoporus taxicola</i>		fungus	30/09/2007	-	1
<i>Russula nitida</i>	Purple Swamp Brittlegill	fungus	13/09/1997	-	1
<i>Tomentella coerulea</i>		fungus	30/09/2007	-	1
<i>Russula fragilis</i>	Fragile Russula	fungus	28/10/1990	09/10/1994	2
<i>Russula exalbicans</i>	Bleached Brittlegill	fungus	13/09/1997	-	1
<i>Russula emetica</i>	Sickener	fungus	28/10/1990	19/09/2010	7
<i>Russula claroflava</i>	Yellow Swamp Brittlegill	fungus	13/09/1997	-	1
<i>Russula brunneoviolacea</i>		fungus	27/10/1991	-	2
<i>Russula betularum</i>	Birch Brittlegill	fungus	28/10/1990	09/10/1994	4
<i>Russula ochroleuca</i>	Ochre Brittlegill	fungus	28/10/1990	19/09/2010	9
<i>Calocera pallidospathulata</i>	Pale Stagshorn	fungus	28/10/1990	30/09/2007	4
<i>Tremella mesenterica</i>	Yellow Brain	fungus	28/10/1990	30/09/2007	4
<i>Melampsorium betulinum</i>	Birch Rust	fungus	31/10/1993	-	1
<i>Miyagia pseudosphaeria</i>		fungus	11/08/1993	-	1
<i>Phragmidium violaceum</i>	Violet Bramble Rust	fungus	28/10/1990	09/10/1994	6
<i>Melampsora populnea</i>		fungus	31/10/1993	-	1
<i>Melampsora caprearum</i>		fungus	31/10/1993	-	1
<i>Thelephora terrestris</i>	Earth-Fan	fungus	28/10/1990	30/09/2007	4
<i>Calocera viscosa</i>	Yellow Stagshorn	fungus	27/10/1991	30/09/2007	5
<i>Thelephora terrestris f. resupinata</i>		fungus	13/09/1997	-	1
<i>Calocera cornea</i>	Small Stagshorn	fungus	21/06/1997	-	1
<i>Rickenella fibula</i>	Orange Moss-cap	fungus	28/10/1990	27/10/1991	3
<i>Resinicium bicolor</i>		fungus	16/03/1996	-	1
<i>Trechispora farinacea</i>		fungus	16/03/1996	-	1
<i>Tomentella sublilacina</i>		fungus	30/09/2007	-	1
<i>Tomentella ellisii</i>		fungus	30/09/2007	-	1

Latin Name	Common Name	Taxon Group	First Date	Last Date	No. of Rec's
<i>Lactarius turpis</i>	Ugly Milkcap	fungus	28/10/1990	19/09/2010	7
<i>Dacrymyces stillatus</i>	Common Jellyspot	fungus	28/10/1990	-	1
<i>Phlebiopsis gigantea</i>		fungus	16/03/1996	-	1
<i>Russula aeruginea</i>	Green Brittlegill	fungus	28/10/1990	30/09/2007	8
<i>Trametes hirsuta</i>	Hairy Bracket	fungus	16/03/1996	-	1
<i>Trametes gibbosa</i>	Lumpy Bracket	fungus	16/03/1996	19/09/2010	3
<i>Skeletocutis nivea</i>	Hazel Bracket	fungus	16/03/1996	-	1
<i>Skeletocutis amorpha</i>		fungus	16/03/1996	30/09/2007	2
<i>Polyporus squamosus</i>	Dryad's Saddle	fungus	21/06/1997	-	1
<i>Trichaptum abietinum</i>	Purplepore Bracket	fungus	31/10/1993	30/09/2007	5
<i>Daedaleopsis confragosa</i>	Blushing Bracket	fungus	31/10/1993	04/12/2013	3
<i>Tyromyces chioneus</i>		fungus	09/10/1994	-	1
<i>Gymnopilus penetrans</i>	Common Rustgill	fungus	27/10/1991	09/10/1994	4
<i>Hyphoderma praetermissum</i>		fungus	30/09/2007	-	1
<i>Pholiota gummosa</i>	Sticky Scalycap	fungus	28/10/1990	09/10/1994	2
<i>Bjerkandera adusta</i>	Smoky Bracket	fungus	27/10/1991	16/03/1996	5
<i>Meripilus giganteus</i>	Giant Polypore	fungus	09/10/1994	-	1
<i>Grifola frondosa</i>	Hen of the Woods	fungus	21/06/1997	-	1
<i>Ganoderma</i>		fungus	09/10/1994	-	1
<i>Polyporus brumalis</i>	Winter Polypore	fungus	28/10/1990	16/03/1996	3
<i>Lactarius glyciosmus</i>	Coconut Milkcap	fungus	28/10/1990	-	1
<i>Postia stiptica</i>	Bitter Bracket	fungus	30/09/2007	-	1
<i>Lactarius torminosus</i>	Woolly Milkcap	fungus	28/10/1990	-	1
<i>Lactarius tabidus</i>	Birch Milkcap	fungus	27/10/1991	-	2
<i>Lactarius subdulcis</i>	Mild Milkcap	fungus	28/10/1990	09/10/1994	2
<i>Lactarius rufus</i>	Rufous Milkcap	fungus	27/10/1991	19/09/2010	5
<i>Lactarius quietus</i>	Oakbug Milkcap	fungus	13/09/1997	-	1
<i>Trametes versicolor</i>	Turkeytail	fungus	31/08/1982	30/09/2007	12
<i>Lactarius hepaticus</i>	Liver Milkcap	fungus	28/10/1990	09/10/1994	2
<i>Lactarius vietus</i>	Grey Milkcap	fungus	09/10/1994	-	1
<i>Lactarius deliciosus</i>	Saffron Milkcap	fungus	19/09/2010	-	1
<i>Lactarius</i>		fungus	09/10/1994	-	1
<i>Peniophora quercina</i>		fungus	09/10/1994	16/03/1996	2
<i>Peniophora incarnata</i>	Rosy Crust	fungus	16/03/1996	-	1
<i>Auriscalpium vulgare</i>	Earpick Fungus	fungus	16/03/1996	30/09/2007	2
<i>Phlebiella sulphurea</i>	Yellow Cobweb	fungus	30/09/2007	-	1
<i>Sparassis crispa</i>	Wood Cauliflower	fungus	28/10/1990	19/09/2010	4
<i>Lactarius pubescens</i>	Bearded Milkcap	fungus	28/10/1990	09/10/1994	3
<i>Hypoxylon cohaerens</i>		fungus	16/03/1996	-	1
<i>Agaricus porphyrocephalus</i>		fungus	28/10/1990	-	1
<i>Mollisia poaeoides</i>		fungus	09/10/1994	-	1
<i>Mollisia ligni</i>		fungus	16/03/1996	-	1
<i>Mollisia cinerea</i>	Common Grey Disco	fungus	16/03/1996	-	1
<i>Xylaria hypoxylon</i>	Candlesnuff Fungus	fungus	28/10/1990	30/09/2007	6

Latin Name	Common Name	Taxon Group	First Date	Last Date	No. of Rec's
<i>Kretzschmaria deusta</i>	Brittle Cinder	fungus	31/08/1982	16/03/1996	3
<i>Elaphocordyceps capitata</i>	Drumstick Truffleclub	fungus	30/09/2007	-	1
<i>Hypoxylon fuscum</i>	Hazel Woodwart	fungus	16/03/1996	-	1
<i>Coprinus plicatilis</i>		fungus	13/09/1997	-	1
<i>Daldinia concentrica</i>	King Alfred's Cakes	fungus	31/10/1993	16/03/1996	3
<i>Eutypa spinosa</i>		fungus	16/03/1996	-	1
<i>Diatrype stigma</i>	Common Tarcrust	fungus	16/03/1996	-	1
<i>Discosia artocreas</i>		fungus	09/10/1994	-	1
<i>Sphaeronaemella fimicola</i>		fungus	16/03/1996	-	1
<i>Hypholoma capnoides</i>	Conifer Tuft	fungus	28/10/1990	19/09/2010	2
<i>Hypoxylon multiforme</i>	Birch Woodwart	fungus	30/09/2007	-	1
<i>Amanita citrina</i> var. <i>citrina</i>	False Deathcap	fungus	19/09/2010	-	1
<i>Amanita rubescens</i> var. <i>rubescens</i>	Blusher	fungus	19/09/2010	-	1
<i>Amanita rubescens</i> var. <i>annulosulphurea</i>		fungus	30/09/2007	-	1
<i>Amanita rubescens</i>	Blusher	fungus	28/10/1990	30/09/2007	8
<i>Amanita pantherina</i>	Panthercap	fungus	19/09/2010	-	1
<i>Amanita muscaria</i> var. <i>muscaria</i>	Fly Agaric	fungus	19/09/2010	-	1
<i>Amanita muscaria</i> var. <i>aureola</i>		fungus	19/09/2010	-	1
<i>Coprinus comatus</i>	Shaggy Inkcap	fungus	28/10/1990	19/09/2010	4
<i>Amanita fulva</i>	Tawny Grisette	fungus	11/08/1993	19/09/2010	5
<i>Coprinus cordisporus</i>		fungus	16/03/1996	-	1
<i>Amanita citrina</i> var. <i>alba</i>	False Deathcap	fungus	19/09/2010	-	1
<i>Amanita citrina</i>	False Deathcap	fungus	28/10/1990	09/10/1994	4
<i>Vascellum pratense</i>	Meadow Puffball	fungus	21/06/1997	13/09/1997	2
<i>Lycoperdon pyriforme</i>	Stump Puffball	fungus	27/10/1991	13/09/1997	4
<i>Lycoperdon perlatum</i>	Common Puffball	fungus	28/10/1990	19/09/2010	5
<i>Lepiota cristata</i>	Stinking Dapperling	fungus	28/10/1990	19/09/2010	5
<i>Nectria episphaeria</i>		fungus	16/03/1996	-	1
<i>Amanita muscaria</i>	Fly Agaric	fungus	28/10/1990	30/09/2007	6
<i>Diplocarpon earlianum</i>		fungus	11/08/1993	-	1
<i>Orbilbia alnea</i>		fungus	09/10/1994	-	1
<i>Lophodermium pinastri</i>	Pine Needle Split	fungus	16/03/1996	-	1
<i>Chlorociboria aeruginascens</i>	Green Elfcup	fungus	30/09/2007	-	1
<i>Calloria neglecta</i>		fungus	16/03/1996	-	1
<i>Ascocoryne sarcoides</i>	Purple Jellydisc	fungus	09/10/1994	-	1
<i>Lachnum brevopilosum</i>		fungus	30/09/2007	-	1
<i>Melanospora caprina</i>		fungus	31/10/1993	-	1
<i>Leptotrochila ranunculi</i>		fungus	11/08/1993	-	1
<i>Helvella crispa</i>	White Saddle	fungus	19/09/2010	-	1
<i>Erysiphe heraclei</i>		fungus	11/08/1993	-	1
<i>Erysiphe alphitoides</i>	Oak Mildew	fungus	28/10/1990	30/09/2007	5
<i>Penicillium claviforme</i>		fungus	30/09/2007	-	1
<i>Elaphomyces granulatus</i>	False Truffle	fungus	18/10/1998	-	1
<i>Rhopoglyphus filicinus</i>	Bracken Map	fungus	31/10/1993	30/09/2007	3

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<i>Leptosphaeria acuta</i>	Nettle Rash	fungus	16/03/1996	-	1
<i>Dematiyscypha dematiicola</i>		fungus	09/10/1994	-	1
<i>Cheilymenia granulata</i>		fungus	30/09/2007	-	1
<i>Hypomyces chrysospermus</i>	Bolete Mould	fungus	31/10/1993	19/09/2010	3
<i>Hypocrea pulvinata</i>	Ochre Cushion	fungus	16/03/1996	-	1
<i>Cordyceps ophioglossoides</i>	Snaketongue Truffleclub	fungus	31/08/1982	18/10/1998	2
<i>Cordyceps militaris</i>	Scarlet Caterpillarclub	fungus	30/09/2007	-	1
<i>Claviceps purpurea</i>	Ergot	fungus	28/10/1990	30/09/2007	9
<i>Gnomonia alni-viridis</i>		fungus	16/03/1996	-	1
<i>Ascobolus albidus</i>		fungus	16/03/1996	-	1
<i>Otidea onotica</i>	Hare's Ear	fungus	19/09/2010	-	1
<i>Saccobolus globuliferellus</i>		fungus	16/03/1996	-	1
<i>Aleuria aurantia</i>	Orange Peel Fungus	fungus	31/10/1993	-	1
<i>Peziza echinospora</i>	Charcoal Cup	fungus	09/10/1994	-	1
<i>Peziza badia</i>	Bay Cup	fungus	28/10/1990	-	1
<i>Peziza arvernensis</i>		fungus	30/09/2007	-	1
<i>Humaria hemisphaerica</i>	Glazed Cup	fungus	09/10/1994	-	1
<i>Helvella lacunosa</i>	Elfin Saddle	fungus	19/09/2010	-	1
<i>Cortinarius decipiens</i>	Sepia Webcap	fungus	09/10/1994	-	1
<i>Scutellinia scutellata</i>	Common Eyelash	fungus	09/10/1994	-	1
<i>Mycena metata</i>		fungus	31/08/1982	-	1
<i>Pluteus cervinus</i>	Deer Shield	fungus	27/10/1991	30/09/2007	4
<i>Pleurotus ostreatus</i>	Oyster Mushroom	fungus	31/10/1993	-	1
<i>Oudemansiella mucida</i>	Porcelain Fungus	fungus	27/10/1991	-	2
<i>Flammulina velutipes var. velutipes</i>	Velvet Shank	fungus	19/09/2010	-	1
<i>Armillaria mellea</i>	Honey Fungus	fungus	28/10/1990	09/10/1994	2
<i>Panellus stipticus</i>	Bitter Oysterling	fungus	16/03/1996	-	2
<i>Amanita submembranacea</i>		fungus	30/09/2007	-	1
<i>Mycena polygramma</i>	Grooved Bonnet	fungus	28/10/1990	09/10/1994	2
<i>Coprinopsis lagopides</i>		fungus	27/10/1991	21/06/1997	6
<i>Mycena leptcephala</i>	Nitrous Bonnet	fungus	30/09/2007	-	1
<i>Mycena inclinata</i>	Clustered Bonnet	fungus	31/10/1993	19/09/2010	3
<i>Mycena galopus var. nigra</i>	Black Milking Bonnet	fungus	28/10/1990	-	1
<i>Mycena galopus var. candida</i>	White Milking Bonnet	fungus	28/10/1990	-	1
<i>Mycena galopus</i>	Milking Bonnet	fungus	09/10/1994	30/09/2007	3
<i>Mycena galericulata</i>	Common Bonnet	fungus	28/10/1990	30/09/2007	5
<i>Mycena vitilis</i>	Snapping Bonnet	fungus	30/09/2007	-	1
<i>Galerina marginata</i>	Funeral Bell	fungus	31/10/1993	-	1
<i>Kuehneromyces mutabilis</i>	Sheathed Woodtuft	fungus	28/10/1990	09/10/1994	3
<i>Hypholoma fasciculare var. fasciculare</i>	Sulphur Tuft	fungus	19/09/2010	-	1
<i>Hypholoma fasciculare</i>	Sulphur Tuft	fungus	28/10/1990	30/09/2007	6
<i>Hypholoma elongatum</i>	Sphagnum Brownie	fungus	11/08/1993	-	1
<i>Pilaira anomala</i>		fungus	16/03/1996	-	1
<i>Hebeloma crustuliniforme</i>	Poisonpie	fungus	28/10/1990	27/10/1991	3

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<i>Pluteus salicinus</i>	Willow Shield	fungus	09/10/1994	-	1
<i>Gymnopilus fulgens</i>		fungus	01/09/1991	27/10/1991	6
<i>Coprinellus disseminatus</i>	Fairy Inkcap	fungus	09/10/1994	-	1
<i>Galerina hypnorum</i>	Moss Bell	fungus	31/08/1982	-	1
<i>Agrocybe pediades</i>	Common Fieldcap	fungus	21/06/1997	-	1
<i>Psathyrella spadiceogrisea</i>	Spring Brittlestem	fungus	30/09/2007	-	1
<i>Psathyrella piluliformis</i>	Common Stump Brittlestem	fungus	27/10/1991	13/09/1997	5
<i>Psathyrella pennata</i>		fungus	30/09/2007	-	1
<i>Psathyrella obtusata</i> var. <i>aberrans</i>		fungus	30/09/2007	-	1
<i>Mycena crocata</i>	Saffrondrop Bonnet	fungus	31/08/1982	-	1
<i>Coprinopsis atramentaria</i>	Common Inkcap	fungus	21/06/1997	19/09/2010	2
<i>Fistulina hepatica</i>	Beefsteak Fungus	fungus	31/08/1982	-	1
<i>Mycena filopes</i>	Iodine Bonnet	fungus	30/09/2007	-	1
<i>Crepidotus variabilis</i>	Variable Oysterling	fungus	28/10/1990	-	1
<i>Crepidotus applanatus</i>		fungus	30/09/2007	-	1
<i>Hygrocybe conica</i>	Blackening Waxcap	fungus	28/10/1990	-	1
<i>Ampulloclitocybe clavipes</i>	Club Foot	fungus	31/08/1982	-	1
<i>Laccaria purpureobadia</i>		fungus	27/10/1991	-	1
<i>Inocybe eutheles</i>		fungus	09/10/1994	-	1
<i>Laccaria laccata</i>	Deceiver	fungus	28/10/1990	30/09/2007	9
<i>Inocybe lacera</i>		fungus	09/10/1994	30/09/2007	2
<i>Rhodocybe gemina</i>		fungus	28/10/1990	-	1
<i>Entoloma rhodopolium</i>	Wood Pinkgill	fungus	28/10/1990	-	1
<i>Entoloma conferendum</i>	Star Pinkgill	fungus	30/09/2007	-	1
<i>Clitopilus prunulus</i>	The Miller	fungus	28/10/1990	-	1
<i>Cortinarius subbalaustinus</i>		fungus	09/10/1994	-	1
<i>Cortinarius saturninus</i>		fungus	19/09/2010	-	1
<i>Pholiota adiposa</i>		fungus	09/10/1994	-	1
<i>Laccaria proxima</i>	Scurfy Deceiver	fungus	31/10/1993	19/09/2010	3
<i>Marasmiellus vaillantii</i>	Goblet Parachute	fungus	30/09/2007	-	1
<i>Cortinarius anomalus</i>	Variable Webcap	fungus	31/08/1982	-	1
<i>Mycena alcalina</i>		fungus	09/10/1994	-	1
<i>Hemimycena lactea</i>	Milky Bonnet	fungus	19/09/2010	-	1
<i>Rhodocollybia maculata</i> var. <i>maculata</i>	Spotted Toughshank	fungus	28/10/1990	19/09/2010	5
<i>Marasmius saccharinus</i>		fungus	28/10/1990	-	1
<i>Marasmius rotula</i>	Collared Parachute	fungus	09/10/1994	30/09/2007	2
<i>Inocybe curvipes</i>		fungus	21/06/1997	13/09/1997	2
<i>Marasmius androsaceus</i>	Horsehair Parachute	fungus	28/10/1990	-	1
<i>Mycena epipterygia</i>	Yellowleg Bonnet	fungus	28/10/1990	30/09/2007	5
<i>Baeospora myosura</i>	Conifercone Cap	fungus	27/10/1991	30/09/2007	5
<i>Tephrocybe atrata</i>		fungus	27/10/1991	-	1
<i>Calocybe gambosa</i>	St. George's Mushroom	fungus	21/06/1997	-	1
<i>Inocybe soluta</i>		fungus	30/09/2007	-	1
<i>Inocybe praetervisa</i>		fungus	30/09/2007	-	1

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<i>Inocybe posterula</i>		fungus	09/10/1994	-	1
<i>Inocybe lacera</i> var. <i>lacera</i>	Torn Fibrecap	fungus	19/09/2010	-	1
<i>Marasmius oreades</i>	Fairy Ring Champignon	fungus	28/10/1990	11/08/1993	2
<i>Pluteus umbrosus</i>	Velvet Shield	fungus	28/10/1990	09/10/1994	2
<i>Melanelixia subaurifera</i>		lichen	28/12/1984	-	1
<i>Cladonia uncialis</i>		lichen	27/02/1954	-	1
<i>Cladonia uncialis</i> subsp. <i>biuncialis</i>		lichen	31/12/1991	-	1
<i>Pycnothelia papillaria</i>		lichen	31/12/1987	31/12/1991	2
<i>Lecanora chlarotera</i>		lichen	28/02/2009	-	1
<i>Lecanora conizaeoides</i>		lichen	31/12/1991	15/06/2007	2
<i>Cetraria aculeata</i>		lichen	31/12/1991	-	1
<i>Cetraria muricata</i>		lichen	31/12/1991	-	1
<i>Evernia prunastri</i>	Oak Moss	lichen	28/02/2009	-	1
<i>Peltigera hymenina</i>		lichen	28/02/2009	-	1
<i>Hypogymnia physodes</i>	Dark Crottle	lichen	31/08/1982	28/02/2009	4
<i>Cladonia squamosa</i>		lichen	26/11/1991	28/02/2009	2
<i>Parmelia saxatilis</i>		lichen	28/12/1984	-	1
<i>Parmelia sulcata</i>	Netted Shield Lichen	lichen	31/12/1991	28/02/2009	2
<i>Physcia adscendens</i>		lichen	28/12/1984	-	1
<i>Physcia tenella</i>		lichen	28/12/1984	-	1
<i>Physconia grisea</i>		lichen	28/12/1984	-	1
<i>Ramalina farinacea</i>		lichen	28/12/1984	-	1
<i>Lepraria incana</i>		lichen	28/02/2009	-	1
<i>Xanthoria parietina</i>	Common Orange Lichen	lichen	28/12/1984	-	1
<i>Xanthoria polycarpa</i>		lichen	28/12/1984	-	1
<i>Peltigera canina</i>		lichen	31/08/1982	-	1
<i>Flavoparmelia caperata</i>		lichen	31/12/1991	28/02/2009	2
<i>Cladonia crispata</i> var. <i>cetrariiformis</i>		lichen	31/12/1991	-	1
<i>Trapeliopsis granulosa</i>		lichen	31/12/1991	-	1
<i>Placyinthiella icmalea</i>		lichen	31/12/1991	-	1
<i>Placyinthiella uliginosa</i>		lichen	31/12/1991	-	1
<i>Candelariella reflexa</i>		lichen	28/12/1984	-	1
<i>Cladonia</i>	Cup Lichen	lichen	31/12/1970	-	2
<i>Cladonia cervicornis</i> subsp. <i>cervicornis</i>		lichen	28/02/2009	-	1
<i>Cladonia cervicornis</i> subsp. <i>verticillata</i>		lichen	31/12/1987	-	1
<i>Cladonia chlorophaea</i>		lichen	26/11/1991	28/02/2009	4
<i>Cladonia ciliata</i> var. <i>tenuis</i>		lichen	26/11/1991	19/01/1998	3
<i>Cladonia subulata</i>		lichen	28/02/2009	-	1
<i>Cladonia coniocraea</i>		lichen	31/12/1991	28/02/2009	3
<i>Cladonia strepsilis</i>		lichen	31/12/1987	31/12/1991	4
<i>Cladonia fimbriata</i>		lichen	28/02/2009	-	1
<i>Cladonia floerkeana</i>		lichen	31/08/1982	28/02/2009	4
<i>Cladonia furcata</i>		lichen	27/02/1954	28/02/2009	3
<i>Cladonia glauca</i>		lichen	31/12/1991	-	1

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<i>Cladonia gracilis</i>		lichen	31/12/1991	-	1
<i>Cladonia macilenta</i>		lichen	26/11/1991	31/12/1991	2
<i>Cladonia polydactyla</i>		lichen	28/02/2009	-	1
<i>Cladonia pyxidata</i>		lichen	27/02/1954	28/02/2009	2
<i>Cladonia rangiferina</i>	Reindeer Moss	lichen	27/02/1954	-	1
<i>Cladonia ramulosa</i>		lichen	31/12/1991	28/02/2009	3
<i>Cladonia coccifera</i>	Scarlet-cup Lichen	lichen	27/02/1954	31/12/1991	4
<i>Cladonia portentosa</i>	Reindeer Moss	lichen	31/08/1982	28/02/2009	7
<i>Cololejeunea minutissima</i>	Minute Pouncewort	liverwort	28/02/2009	-	2
<i>Mylia anomala</i>	Anomalous Flapwort	liverwort	27/02/1954	31/12/1992	5
<i>Gymnocolea inflata</i>	Inflated Notchwort	liverwort	27/02/1954	28/02/2009	6
<i>Aneura pinguis</i>	Greasewort	liverwort	28/02/2009	-	2
<i>Riccardia multifida</i>	Delicate Germanderwort	liverwort	26/09/2014	-	1
<i>Metzgeria furcata</i>	Forked Veilwort	liverwort	28/02/2009	-	2
<i>Metzgeria violacea</i>	Blueish Veilwort	liverwort	28/02/2009	-	2
<i>Riccia sorocarpa</i>	Common Crystalwort	liverwort	28/02/2009	-	2
<i>Frullania dilatata</i>	Dilated Scalewort	liverwort	28/02/2009	-	2
<i>Lophocolea bidentata</i> var. <i>bidentata</i>		liverwort	31/07/1985	-	1
<i>Microlejeunea ulicina</i>	Fairy Beads	liverwort	28/02/2009	-	2
<i>Radula complanata</i>	Even Scalewort	liverwort	28/02/2009	-	2
<i>Lunularia cruciata</i>	Crescent-cup Liverwort	liverwort	28/12/1984	-	1
<i>Reboulia hemisphaerica</i>	Hemisphaeric Liverwort	liverwort	27/02/1954	-	1
<i>Marchantia polymorpha</i>	Common Liverwort	liverwort	28/02/2009	-	2
<i>Riccia glauca</i>	Glaucous Crystalwort	liverwort	28/02/2009	-	2
<i>Pellia epiphylla</i>	Overleaf Pellia	liverwort	28/02/2009	-	2
<i>Odontoschisma sphagni</i>	Bog-moss Flapwort	liverwort	27/02/1954	28/02/2009	5
<i>Fossombronia</i>	Liverwort	liverwort	28/02/2009	-	1
<i>Fossombronia pusilla</i>	Common Frillwort	liverwort	07/09/1993	-	1
<i>Calypogeia fissa</i>	Common Pouchwort	liverwort	28/02/2009	26/09/2014	3
<i>Calypogeia muelleriana</i>	Mueller's Pouchwort	liverwort	28/02/2009	-	2
<i>Calypogeia sphagnicola</i>	Bog Pouchwort	liverwort	26/09/2014	-	1
<i>Cephalozia bicuspidata</i>	Two-horned Pincerwort	liverwort	28/02/2009	-	2
<i>Lophocolea bispinosa</i>	Great Crestwort	liverwort	27/08/2009	-	1
<i>Cladopodiella francisci</i>	Holt Notchwort	liverwort	29/09/2014	-	1
<i>Lophocolea bidentata</i> var. <i>rivularis</i>		liverwort	31/07/1985	-	1
<i>Cephaloziella</i>	Liverwort	liverwort	28/02/2009	-	2
<i>Cephaloziella divaricata</i>	Common Threadwort	liverwort	26/09/2014	29/09/2014	2
<i>Cephaloziella hampeana</i>	Hampe's Threadwort	liverwort	29/09/2014	-	1
<i>Jungermannia gracillima</i>	Crenulated Flapwort	liverwort	29/09/2014	-	1
<i>Lepidozia reptans</i>	Creeping Fingerwort	liverwort	28/02/2009	09/11/2014	3
<i>Lophocolea bidentata</i>	Bifid Crestwort	liverwort	28/02/2009	26/09/2014	3
<i>Diplophyllum albicans</i>	White Earwort	liverwort	31/07/1985	-	1
<i>Cephalozia connivens</i>	Forcipated Pincerwort	liverwort	28/02/2009	26/09/2014	3
<i>Lophocolea heterophylla</i>	Variable-leaved Crestwort	liverwort	28/12/1984	28/02/2009	4

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<i>Hypnum jutlandicum</i>	Heath Plait-moss	moss	10/03/1994	26/09/2014	15
<i>Rhynchostegium confertum</i>	Clustered Feather-moss	moss	28/02/2009	-	2
<i>Rhynchostegium megapolitanum</i>	Megapolitan Feather-moss	moss	27/02/1954	-	1
<i>Scleropodium purum</i>	Neat Feather-moss	moss	31/07/1985	-	1
<i>Warnstorfia fluitans</i>	Floating Hook-moss	moss	28/02/2009	-	2
<i>Pleurozium schreberi</i>	Red-stemmed Feather-moss	moss	27/02/1954	26/09/2014	8
<i>Rhytidiadelphus squarrosus</i>	Springy Turf-moss	moss	31/07/1985	-	1
<i>Rhytidiadelphus triquetrus</i>	Big Shaggy-moss	moss	31/07/1985	-	1
<i>Calliergonella cuspidata</i>	Pointed Spear-moss	moss	31/07/1985	28/02/2009	3
<i>Hypnum cupressiforme</i>		moss	31/12/1970	28/02/2009	4
<i>Hypnum andoi</i>	Mamillate Plait-moss	moss	28/02/2009	-	2
<i>Hypnum cupressiforme</i>	Cypress-leaved Plait-moss	moss	28/02/2009	-	1
<i>Ulota crispa</i>	Crisped Pincushion	moss	28/02/2009	-	1
<i>Hypnum imponens</i>	Pellucid Plait-moss	moss	27/02/1954	28/02/2009	5
<i>Brachytheciastrum velutinum</i>	Velvet Feather-moss	moss	28/12/1984	-	1
<i>Isoetecium myosuroides</i>	Slender Mouse-tail Moss	moss	28/02/2009	-	1
<i>Isoetecium myosuroides</i> var. <i>myosuroides</i>		moss	28/02/2009	-	1
<i>Neckera complanata</i>	Flat Neckera	moss	31/08/1982	-	1
<i>Thamnobryum alopecurum</i>	Fox-tail Feather-moss	moss	28/02/2009	-	2
<i>Plagiothecium cavifolium</i>	Round Silk-moss	moss	28/02/2009	-	1
<i>Pseudotaxiphyllum elegans</i>	Elegant Silk-moss	moss	28/02/2009	-	2
<i>Orthotrichum affine</i>	Wood Bristle-moss	moss	28/12/1984	28/02/2009	3
<i>Orthotrichum diaphanum</i>	White-tipped Bristle-moss	moss	28/12/1984	-	1
<i>Orthotrichum lyellii</i>	Lyell's Bristle-moss	moss	28/12/1984	-	1
<i>Orthotrichum pulchellum</i>	Elegant Bristle-moss	moss	28/02/2009	-	2
<i>Ulota crispa</i>		moss	28/02/2009	-	1
<i>Hypnum cupressiforme</i> var. <i>cupressiforme</i>		moss	27/02/1954	-	1
<i>Dicranum scoparium</i>	Broom Fork-moss	moss	27/02/1954	26/09/2014	15
<i>Aulacomnium androgynum</i>	Bud-headed Groove-moss	moss	28/02/2009	-	2
<i>Aulacomnium palustre</i>	Bog Groove-moss	moss	27/02/1954	26/09/2014	8
<i>Bryum argenteum</i>	Silver-moss	moss	28/02/2009	-	2
<i>Bryum caespiticium</i>	Tufted Thread-moss	moss	28/12/1984	-	1
<i>Bryum capillare</i>	Capillary Thread-moss	moss	31/07/1985	28/02/2009	3
<i>Bryum pallens</i>	Pale Thread-moss	moss	28/02/2009	-	2
<i>Pohlia annotina</i>	Pale-fruited Thread-moss	moss	29/09/2014	-	1
<i>Pohlia nutans</i>	Nodding Thread-moss	moss	27/02/1954	31/07/1985	3
<i>Mnium hornum</i>	Swan's-neck Thyme-moss	moss	31/07/1985	28/02/2009	3
<i>Orthodontium lineare</i>	Cape Thread-moss	moss	28/02/2009	09/11/2014	3
<i>Plagiomnium affine</i>	Many-fruited Thyme-moss	moss	28/12/1984	-	1
<i>Eurhynchium praelongum</i>	Common Feather-moss	moss	28/12/1984	28/02/2009	6
<i>Dicranella heteromalla</i>	Silky Forklet-moss	moss	28/02/2009	26/09/2014	3
<i>Brachythecium rutabulum</i>	Rough-stalked Feather-moss	moss	31/07/1985	28/02/2009	3
<i>Ceratodon purpureus</i>	Redshank	moss	27/02/1954	28/02/2009	4
<i>Fissidens taxifolius</i>	Common Pocket-moss	moss	28/02/2009	-	2

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<i>Campylopus brevipilus</i>	Compact Swan-neck Moss	moss	27/02/1954	27/07/1986	5
<i>Campylopus flexuosus</i>	Rusty Swan-neck Moss	moss	26/07/1986	28/02/2009	3
<i>Campylopus introflexus</i>	Heath Star Moss	moss	31/07/1985	28/06/2010	6
<i>Leucobryum glaucum</i>	Large White-moss	moss	31/08/1982	28/02/2009	4
<i>Dicranoweisia cirrata</i>	Common Pincushion	moss	31/08/1982	28/02/2009	4
<i>Funaria hygrometrica</i>	Common Cord-moss	moss	28/02/2009	-	2
<i>Amblystegium serpens</i>	Creeping Feather-moss	moss	28/02/2009	-	2
<i>Cratoneuron filicinum</i>	Fern-leaved Hook-moss	moss	28/02/2009	-	2
<i>Fissidens gracilifolius</i>	Narrow-leaved Pocket-moss	moss	28/02/2009	-	1
<i>Plagiomnium undulatum</i>	Hart's-tongue Thyme-moss	moss	28/02/2009	-	2
<i>Sphagnum compactum</i>	Compact Bog-moss	moss	27/02/1954	28/06/2010	13
<i>Dicranum spurium</i>	Rusty Fork-moss	moss	27/02/1954	10/03/1994	13
<i>Didymodon insulanus</i>	Cylindric Beard-moss	moss	28/02/2009	-	2
<i>Tetraphis pellucida</i>	Pellucid Four-tooth Moss	moss	28/02/2009	-	2
<i>Sphagnum tenellum</i>	Soft Bog-moss	moss	27/02/1954	26/09/2014	11
<i>Sphagnum subsecundum</i>	Slender Cow-horn Bog-moss	moss	27/02/1954	-	1
<i>Sphagnum subnitens</i>	Lustrous Bog-moss	moss	28/02/2009	-	3
<i>Sphagnum russowii</i>	Russow's Bog-moss	moss	27/02/1954	31/12/1970	2
<i>Sphagnum pulchrum</i>	Golden Bog-moss	moss	27/02/1954	-	1
<i>Sphagnum papillosum</i>	Papillose Bog-moss	moss	27/02/1954	29/09/2014	7
<i>Sphagnum palustre</i>	Blunt-leaved Bog-moss	moss	09/07/2004	09/11/2014	8
<i>Sphagnum molle</i>	Blushing Bog-moss	moss	09/11/2014	-	1
<i>Sphagnum fallax</i>	Flat-topped Bog-moss	moss	28/02/2009	26/09/2014	4
<i>Sphagnum cuspidatum</i>	Feathery Bog-moss	moss	27/02/1954	26/09/2014	8
<i>Polytrichum commune</i>	Common Haircap	moss	27/02/1954	28/02/2009	5
<i>Pseudocrossidium hornsuschianum</i>	Hornsusch's Beard-moss	moss	28/02/2009	-	2
<i>Syntrichia ruralis</i>	Great Hairy Screw-moss	moss	27/02/1954	-	1
<i>Tortula muralis</i>	Wall Screw-moss	moss	28/02/2009	-	2
<i>Tortula truncata</i>	Common Pottia	moss	28/02/2009	-	2
<i>Atrichum undulatum</i>	Common Smoothcap	moss	28/02/2009	-	3
<i>Sphagnum denticulatum</i>	Cow-horn Bog-moss	moss	28/02/2009	26/09/2014	4
<i>Polytrichum</i>		moss	31/08/1982	-	1
<i>Polytrichum formosum</i>	Bank Haircap	moss	31/08/1982	28/02/2009	5
<i>Polytrichum juniperinum</i>	Juniper Haircap	moss	27/02/1954	28/02/2009	4
<i>Sphagnum capillifolium</i>	Red Bog-moss	moss	28/02/2009	-	3
<i>Sphagnum capillifolium subsp. capillifolium</i>	Acute-leaved Bog-moss	moss	26/07/1986	26/09/2014	2
<i>Sphagnum capillifolium subsp. rubellum</i>	Red Bog-moss	moss	27/07/1986	29/09/2014	3
<i>Atrichum undulatum var. undulatum</i>		moss	09/11/2014	-	1
<i>Lycopodiella inundata</i>	Marsh Clubmoss	clubmoss	27/02/1954	05/06/2014	7
<i>Dryopteris filix-mas agg.</i>	Male Fern	fern	31/12/1985	-	1
<i>Polypodium vulgare</i>	Polypody	fern	31/08/1982	-	1
<i>Dryopteris aemula</i>	Hay-scented Buckler-fern	fern	31/08/1982	-	3
<i>Pteridium aquilinum</i>	Bracken	fern	27/02/1954	28/02/2009	31
<i>Dryopteris filix-mas</i>	Male-fern	fern	12/07/1986	28/02/2009	3

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<i>Dryopteris dilatata</i>	Broad Buckler-fern	fern	31/08/1982	28/02/2009	9
<i>Larix decidua</i>	European Larch	conifer	24/07/1993	-	1
<i>Larix kaempferi</i>	Japanese Larch	conifer	24/07/1993	-	1
<i>Pinus sylvestris</i>	Scots Pine	conifer	27/02/1954	26/04/2011	16
<i>Tsuga heterophylla</i>	Western Hemlock-spruce	conifer	24/07/1993	-	1
<i>Taxus baccata</i>	Yew	conifer	28/02/2009	-	1
<i>Juncus conglomeratus</i>	Compact Rush	flowering plant	12/07/1986	28/06/2010	9
<i>Luzula multiflora</i>	Heath Wood-rush	flowering plant	31/12/1985	28/06/2010	5
<i>Luzula campestris</i>	Field Wood-rush	flowering plant	31/12/1985	31/12/1991	3
<i>Juncus tenuis</i>	Slender Rush	flowering plant	28/02/2009	28/06/2010	2
<i>Juncus squarrosus</i>	Heath Rush	flowering plant	27/02/1954	28/06/2010	12
<i>Calamagrostis epigejos</i>	Wood Small-reed	flowering plant	28/02/2009	-	1
<i>Juncus effusus</i>	Soft-rush	flowering plant	31/08/1982	28/06/2010	13
<i>Juncus bulbosus</i>	Bulbous Rush	flowering plant	31/12/1985	28/06/2010	13
<i>Juncus bufonius</i>	Toad Rush	flowering plant	31/12/1985	28/02/2009	2
<i>Juncus articulatus</i>	Jointed Rush	flowering plant	31/12/1985	28/02/2009	4
<i>Juncus acutiflorus</i>	Sharp-flowered Rush	flowering plant	12/07/1986	28/06/2010	4
<i>Mentha arvensis</i>	Corn Mint	flowering plant	31/08/1982	28/02/2009	6
<i>Juncus bufonius agg.</i>	Toad Rush agg.	flowering plant	12/07/1986	09/07/2004	3
<i>Trichophorum caespitosum</i>	Deergrass	flowering plant	27/02/1954	28/02/2009	17
<i>Rhynchospora alba</i>	White Beak-sedge	flowering plant	27/02/1954	08/07/2014	7
<i>Isolepis setacea</i>	Bristle Club-rush	flowering plant	07/09/1993	-	1
<i>Luzula multiflora subsp. congesta</i>	Heath Wood-Rush	flowering plant	09/07/2004	-	1
<i>Juncus inflexus</i>	Hard Rush	flowering plant	28/02/2009	-	1
<i>Arrhenatherum elatius</i>	False Oat-grass	flowering plant	31/12/1985	28/02/2009	4
<i>Festuca</i>	Fescue	flowering plant	31/08/1982	-	1
<i>Elytrigia repens</i>	Common Couch	flowering plant	12/07/1986	-	1
<i>Deschampsia flexuosa</i>	Wavy Hair-grass	flowering plant	31/12/1985	28/06/2010	21
<i>Deschampsia cespitosa</i>	Tufted Hair-Grass	flowering plant	31/12/1985	09/07/2004	2
<i>Danthonia decumbens</i>	Heath-grass	flowering plant	31/12/1985	28/02/2009	4
<i>Dactylis glomerata</i>	Cock's-foot	flowering plant	31/12/1985	28/02/2009	3
<i>Cynosurus cristatus</i>	Crested Dog's-tail	flowering plant	31/12/1985	28/02/2009	3
<i>Verbascum thapsus</i>	Great Mullein	flowering plant	12/07/1986	28/02/2009	2
<i>Bromus sterilis</i>	Barren Brome	flowering plant	31/12/1985	-	1
<i>Eriophorum vaginatum</i>	Hare's-tail Cottongrass	flowering plant	31/12/1975	08/06/2009	7
<i>Bromus hordeaceus subsp. hordeaceus</i>	Common Soft-brome	flowering plant	12/07/1986	-	1
<i>Brachypodium sylvaticum</i>	False-brome	flowering plant	12/07/1986	28/06/2010	3
<i>Luzula pilosa</i>	Hairy Wood-rush	flowering plant	31/12/1985	-	1
<i>Anthoxanthum odoratum</i>	Sweet Vernal-grass	flowering plant	31/12/1985	28/06/2010	6
<i>Alopecurus pratensis</i>	Meadow Foxtail	flowering plant	12/07/1986	-	1
<i>Alopecurus geniculatus</i>	Marsh Foxtail	flowering plant	31/12/1985	-	1
<i>Aira praecox</i>	Early Hair-grass	flowering plant	31/12/1985	28/02/2009	8
<i>Aira caryophylla</i>	Silver Hair-grass	flowering plant	31/12/1985	31/12/1991	3
<i>Agrostis vinealis</i>	Brown Bent	flowering plant	28/02/2009	-	1

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<i>Agrostis stolonifera</i>	Creeping Bent	flowering plant	31/12/1985	28/02/2009	4
<i>Agrostis curtisii</i>	Bristle Bent	flowering plant	14/10/1994	-	1
<i>Agrostis capillaris</i>	Common Bent	flowering plant	31/12/1985	28/02/2009	16
<i>Agrostis canina</i>	Velvet Bent	flowering plant	31/12/1985	31/12/1991	2
<i>Agrostis canina</i>	Velvet Bent	flowering plant	12/07/1986	-	1
<i>Bromopsis ramosa</i>	Hairy-brome	flowering plant	31/08/1982	31/12/1985	2
<i>Euphrasia nemorosa</i>	Eyebright	flowering plant	31/12/1985	28/02/2009	3
<i>Carex binervis</i>	Green-ribbed Sedge	flowering plant	12/07/1986	31/12/1991	2
<i>Plantago major</i>	Greater Plantain	flowering plant	31/08/1982	28/02/2009	5
<i>Prunella vulgaris</i>	Selfheal	flowering plant	31/08/1982	28/02/2009	9
<i>Scutellaria galericulata</i>	Skullcap	flowering plant	09/07/2004	-	1
<i>Scutellaria minor</i>	Lesser Skullcap	flowering plant	09/07/2004	-	1
<i>Stachys officinalis</i>	Betony	flowering plant	31/12/1985	-	1
<i>Stachys sylvatica</i>	Hedge Woundwort	flowering plant	31/12/1985	28/02/2009	4
<i>Teucrium scorodonia</i>	Wood Sage	flowering plant	31/08/1982	28/06/2010	20
<i>Thymus polytrichus</i>		flowering plant	31/12/1985	12/07/1986	2
<i>Thymus pulegioides</i>	Large Thyme	flowering plant	27/02/1954	26/08/2006	3
<i>Veronica chamaedrys</i>	Germander Speedwell	flowering plant	31/12/1985	12/07/1986	2
<i>Ligustrum vulgare</i>	Wild Privet	flowering plant	31/12/1985	-	1
<i>Veronica montana</i>	Wood Speedwell	flowering plant	09/07/2004	-	1
<i>Odontites vernus</i>	Red Bartsia	flowering plant	31/12/1985	28/02/2009	3
<i>Pedicularis sylvatica</i>	Lousewort	flowering plant	31/12/1985	31/12/1991	3
<i>Callitriche stagnalis</i>	Common Water-Starwort	flowering plant	09/07/2004	-	1
<i>Festuca ovina agg.</i>	Sheep's Fescue agg.	flowering plant	09/07/2004	-	3
<i>Callitriche stagnalis</i>	Common Water-starwort	flowering plant	31/12/1985	28/02/2009	2
<i>Sedum album</i>	White Stonecrop	flowering plant	26/08/2006	-	1
<i>Digitalis purpurea</i>	Foxglove	flowering plant	31/08/1982	28/02/2009	6
<i>Linaria vulgaris</i>	Common Toadflax	flowering plant	31/12/1985	28/02/2009	3
<i>Plantago coronopus</i>	Buck's-horn Plantain	flowering plant	31/12/1985	28/02/2009	4
<i>Plantago lanceolata</i>	Ribwort Plantain	flowering plant	31/08/1982	28/02/2009	5
<i>Fraxinus excelsior</i>	Ash	flowering plant	31/12/1985	28/02/2009	4
<i>Carex echinata</i>	Star Sedge	flowering plant	09/07/2004	28/06/2010	6
<i>Eleocharis palustris</i>	Common Spike-rush	flowering plant	28/02/2009	-	2
<i>Carex viridula subsp. oedocarpa</i>	Common Yellow-sedge	flowering plant	12/07/1986	31/12/1991	2
<i>Carex sylvatica</i>	Wood-sedge	flowering plant	31/12/1985	28/02/2009	2
<i>Carex spicata</i>	Spiked Sedge	flowering plant	12/07/1986	-	1
<i>Carex remota</i>	Remote Sedge	flowering plant	31/12/1985	28/02/2009	3
<i>Carex pilulifera</i>	Pill Sedge	flowering plant	31/12/1985	28/06/2010	7
<i>Carex pendula</i>	Pendulous Sedge	flowering plant	28/02/2009	-	1
<i>Carex ovalis</i>	Oval Sedge	flowering plant	31/12/1985	28/02/2009	4
<i>Carex nigra</i>	Common Sedge	flowering plant	31/12/1985	-	1
<i>Carex laevigata</i>	Smooth-stalked Sedge	flowering plant	28/02/2009	-	1
<i>Veronica arvensis</i>	Wall Speedwell	flowering plant	31/12/1985	28/02/2009	2
<i>Carex flacca</i>	Glaucous Sedge	flowering plant	12/07/1986	28/02/2009	2

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<i>Eriophorum angustifolium</i>	Common Cottongrass	flowering plant	27/02/1954	21/06/2013	10
<i>Carex divulsa</i>	Grey Sedge	flowering plant	31/12/1985	28/02/2009	2
<i>Carex curta</i>	White Sedge	flowering plant	31/07/2008	-	1
<i>Verbena officinalis</i>	Vervain	flowering plant	31/08/1982	-	1
<i>Verbascum nigrum</i>	Dark Mullein	flowering plant	31/08/1982	28/02/2009	4
<i>Scrophularia nodosa</i>	Common Figwort	flowering plant	31/08/1982	28/02/2009	5
<i>Scrophularia auriculata</i>	Water Figwort	flowering plant	31/12/1985	28/02/2009	3
<i>Buddleja davidii</i>	Butterfly-bush	flowering plant	31/12/1985	-	1
<i>Veronica serpyllifolia</i>	Thyme-leaved Speedwell	flowering plant	31/12/1985	28/02/2009	5
<i>Veronica persica</i>	Common Field-speedwell	flowering plant	31/12/1985	-	1
<i>Veronica officinalis</i>	Heath Speedwell	flowering plant	31/12/1985	28/06/2010	5
<i>Carex hirta</i>	Hairy Sedge	flowering plant	31/12/1985	28/02/2009	4
<i>Vicia hirsuta</i>	Hairy Tare	flowering plant	31/12/1985	28/02/2009	3
<i>Ornithopus perpusillus</i>	Bird's-foot	flowering plant	31/12/1985	28/02/2009	2
<i>Trifolium campestre</i>	Hop Trefoil	flowering plant	12/07/1986	-	1
<i>Trifolium dubium</i>	Lesser Trefoil	flowering plant	31/12/1985	28/02/2009	3
<i>Trifolium hybridum</i>	Alsike Clover	flowering plant	12/07/1986	-	1
<i>Trifolium micranthum</i>	Slender Trefoil	flowering plant	12/07/1986	28/02/2009	2
<i>Trifolium pratense</i>	Red Clover	flowering plant	31/08/1982	31/12/1985	3
<i>Trifolium repens</i>	White Clover	flowering plant	31/08/1982	28/02/2009	5
<i>Ulex europaeus</i>	Gorse	flowering plant	27/02/1954	28/06/2010	14
<i>Ulex minor</i>	Dwarf Gorse	flowering plant	27/02/1954	28/02/2009	9
<i>Ribes uva-crispa</i>	Gooseberry	flowering plant	31/08/1982	28/03/2007	3
<i>Rubus idaeus</i>	Raspberry	flowering plant	31/12/1985	28/02/2009	2
<i>Lotus pedunculatus</i>	Greater Bird's-foot-trefoil	flowering plant	31/12/1985	28/02/2009	4
<i>Mentha aquatica</i>	Water Mint	flowering plant	31/12/1985	09/07/2004	3
<i>Vicia sativa</i>	Common Vetch	flowering plant	31/08/1982	-	1
<i>Vicia sativa subsp. nigra</i>	Narrow-leaved Vetch	flowering plant	31/12/1985	-	1
<i>Vicia sepium</i>	Bush Vetch	flowering plant	31/12/1985	28/02/2009	2
<i>Vicia tetrasperma</i>	Smooth Tare	flowering plant	31/12/1985	12/07/1986	2
<i>Polygala serpyllifolia</i>	Heath Milkwort	flowering plant	31/12/1985	31/12/1991	3
<i>Alnus glutinosa</i>	Alder	flowering plant	31/12/1985	28/02/2009	6
<i>Betula pendula</i>	Silver Birch	flowering plant	31/08/1982	28/02/2009	24
<i>Betula pendula x pubescens = B. x aurata</i>	Hybrid Birch	flowering plant	31/12/1985	-	1
<i>Betula pubescens</i>	Downy Birch	flowering plant	27/02/1954	28/02/2009	14
<i>Vicia cracca</i>	Tufted Vetch	flowering plant	31/08/1982	28/02/2009	5
<i>Campanula rotundifolia</i>	Harebell	flowering plant	31/12/1985	-	1
<i>Cytisus scoparius</i>	Broom	flowering plant	31/12/1985	-	1
<i>Valeriana officinalis</i>	Common Valerian	flowering plant	12/07/1986	-	1
<i>Succisa pratensis</i>	Devil's-bit Scabious	flowering plant	31/12/1985	15/11/2013	6
<i>Lonicera periclymenum</i>	Honeysuckle	flowering plant	31/08/1982	28/02/2009	12
<i>Lonicera nitida</i>	Wilson's Honeysuckle	flowering plant	28/02/2009	-	1
<i>Dipsacus fullonum</i>	Wild Teasel	flowering plant	28/02/2009	-	1
<i>Dipsacus fullonum</i>	Wild Teasel	flowering plant	31/08/1982	-	1

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<i>Sambucus nigra</i>	Elder	flowering plant	31/08/1982	28/02/2009	5
<i>Narthecium ossifragum</i>	Bog Asphodel	flowering plant	12/07/1986	-	1
<i>Dioscorea communis</i>	Black Bryony	flowering plant	12/07/1986	28/02/2009	2
<i>Medicago lupulina</i>	Black Medick	flowering plant	31/08/1982	12/07/1986	3
<i>Campanula trachelium</i>	Nettle-leaved Bellflower	flowering plant	31/12/1985	-	1
<i>Corylus avellana</i>	Hazel	flowering plant	31/12/1985	28/02/2009	5
<i>Tussilago farfara</i>	Colt's-foot	flowering plant	31/12/1985	-	1
<i>Tripleurospermum maritimum</i>	Sea Mayweed	flowering plant	31/12/1985	07/09/1993	2
<i>Taraxacum officinale agg.</i>	Dandelion	flowering plant	31/08/1982	28/02/2009	4
<i>Sonchus oleraceus</i>	Smooth Sow-thistle	flowering plant	28/02/2009	-	1
<i>Sonchus asper</i>	Prickly Sow-thistle	flowering plant	12/07/1986	28/02/2009	2
<i>Sonchus arvensis</i>	Perennial Sow-thistle	flowering plant	12/07/1986	28/02/2009	3
<i>Solidago virgaurea</i>	Goldenrod	flowering plant	31/12/1985	-	1
<i>Lotus</i>	Bird's-Foot-Trefoil	flowering plant	28/06/2010	-	1
<i>Lotus corniculatus</i>	Common Bird's-foot-trefoil	flowering plant	31/12/1985	28/02/2009	5
<i>Senecio jacobaea</i>	Ragwort	flowering plant	31/08/1982	28/02/2009	7
<i>Bryonia dioica</i>	White Bryony	flowering plant	31/08/1982	31/12/1988	4
<i>Phleum pratense</i>	Timothy	flowering plant	28/02/2009	-	1
<i>Rubus fruticosus agg.</i>	Bramble	flowering plant	31/08/1982	28/02/2009	17
<i>Aphanes arvensis</i>	Parsley-piert	flowering plant	31/12/1985	28/02/2009	2
<i>Amelanchier lamarckii</i>	Juneberry	flowering plant	28/02/2009	-	1
<i>Agrimonia procera</i>	Fragrant Agrimony	flowering plant	28/02/2009	-	1
<i>Agrimonia eupatoria</i>	Agrimony	flowering plant	31/12/1985	31/12/2002	3
<i>Frangula alnus</i>	Alder Buckthorn	flowering plant	28/02/2009	-	1
<i>Humulus lupulus</i>	Hop	flowering plant	31/08/1982	-	1
<i>Vulpia bromoides</i>	Squirreltail Fescue	flowering plant	31/12/1985	28/02/2009	2
<i>Poa trivialis</i>	Rough Meadow-grass	flowering plant	31/12/1985	28/02/2009	3
<i>Poa pratensis</i>	Smooth Meadow-grass	flowering plant	31/12/1985	-	1
<i>Crataegus monogyna</i>	Hawthorn	flowering plant	31/08/1982	10/05/2011	6
<i>Poa annua</i>	Annual Meadow-grass	flowering plant	31/12/1985	28/02/2009	4
<i>Filipendula ulmaria</i>	Meadowsweet	flowering plant	31/12/1985	-	1
<i>Molinia caerulea</i>	Purple Moor-grass	flowering plant	27/02/1954	28/06/2010	29
<i>Melica uniflora</i>	Wood Melick	flowering plant	28/02/2009	-	1
<i>Lolium perenne</i>	Perennial Rye-grass	flowering plant	31/08/1982	28/02/2009	4
<i>Hordeum murinum</i>	Wall Barley	flowering plant	31/12/1985	-	1
<i>Holcus mollis</i>	Creeping Soft-grass	flowering plant	31/12/1985	28/06/2010	10
<i>Holcus lanatus</i>	Yorkshire-fog	flowering plant	31/08/1982	28/06/2010	9
<i>Glyceria fluitans</i>	Floating Sweet-grass	flowering plant	12/07/1986	-	1
<i>Festuca rubra</i>	Red Fescue	flowering plant	31/12/1985	28/02/2009	2
<i>Festuca ovina</i>	Sheep's-fescue	flowering plant	28/02/2009	28/06/2010	2
<i>Festuca filiformis</i>	Fine-leaved Sheep's-fescue	flowering plant	31/12/1985	31/12/1991	2
<i>Poa nemoralis</i>	Wood Meadow-grass	flowering plant	12/07/1986	-	1
<i>Rosa canina agg.</i>	Dog Rose	flowering plant	12/07/1986	-	1
<i>Festuca arundinacea</i>	Tall Fescue	flowering plant	12/07/1986	-	1

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<i>Sorbus aucuparia</i>	Rowan	flowering plant	31/12/1985	28/02/2009	5
<i>Spiraea salicifolia</i>	Bridewort	flowering plant	24/07/1993	-	1
<i>Urtica dioica</i>	Common Nettle	flowering plant	31/08/1982	28/02/2009	10
<i>Lathyrus pratensis</i>	Meadow Vetchling	flowering plant	31/12/1985	12/07/1986	2
<i>Ribes rubrum</i>	Red Currant	flowering plant	31/08/1982	31/12/1985	2
<i>Senecio vulgaris</i>	Groundsel	flowering plant	31/08/1982	28/02/2009	3
<i>Senecio sylvaticus</i>	Heath Groundsel	flowering plant	31/12/1985	28/02/2009	2
<i>Rosa rubiginosa</i>	Sweet-briar	flowering plant	31/08/1982	-	1
<i>Rosa canina</i>	Dog-rose	flowering plant	31/08/1982	28/02/2009	3
<i>Cotoneaster frigidus</i>	Tree Cotoneaster	flowering plant	09/07/2004	-	1
<i>Rosa rubiginosa agg.</i>	Sweet-Briar	flowering plant	12/07/1986	-	1
<i>Rubus caesius</i>	Dewberry	flowering plant	31/12/1985	28/06/2010	2
<i>Prunus spinosa</i>	Blackthorn	flowering plant	31/12/1985	09/07/2004	2
<i>Potentilla sterilis</i>	Barren Strawberry	flowering plant	31/08/1982	28/02/2009	4
<i>Potentilla reptans</i>	Creeping Cinquefoil	flowering plant	31/12/1985	28/06/2010	4
<i>Potentilla erecta</i>	Tormentil	flowering plant	31/08/1982	28/02/2009	17
<i>Potentilla anserina</i>	Silverweed	flowering plant	31/12/1985	28/06/2010	4
<i>Malus sylvestris</i>	Crab Apple	flowering plant	28/02/2009	-	1
<i>Malus pumila</i>	Apple	flowering plant	09/07/2004	28/02/2009	2
<i>Malus sylvestris</i>	Apple	flowering plant	12/07/1986	-	1
<i>Geum urbanum</i>	Wood Avens	flowering plant	31/08/1982	28/02/2009	5
<i>Fragaria vesca</i>	Wild Strawberry	flowering plant	31/12/1985	-	1
<i>Rosa arvensis</i>	Field-rose	flowering plant	31/12/1985	28/02/2009	2
<i>Centaurium erythraea</i>	Common Centaury	flowering plant	31/08/1982	28/06/2010	10
<i>Pastinaca sativa</i>	Wild Parsnip	flowering plant	31/12/1985	28/02/2009	4
<i>Sherardia arvensis</i>	Field Madder	flowering plant	28/02/2009	-	1
<i>Galium verum</i>	Lady's Bedstraw	flowering plant	31/12/1985	-	1
<i>Galium saxatile</i>	Heath Bedstraw	flowering plant	31/08/1982	28/06/2010	15
<i>Galium palustre</i>	Marsh-bedstraw	flowering plant	31/12/1985	28/06/2010	5
<i>Galium mollugo subsp. mollugo</i>	Great Hedge Bedstraw	flowering plant	12/07/1986	-	1
<i>Galium mollugo</i>	Hedge Bedstraw	flowering plant	31/12/1985	28/02/2009	3
<i>Galium aparine</i>	Cleavers	flowering plant	31/12/1985	28/02/2009	3
<i>Galium</i>	Bedstraw	flowering plant	31/08/1982	-	1
<i>Erodium cicutarium</i>	Common Stork's-bill	flowering plant	31/12/1985	-	1
<i>Centaurium pulchellum</i>	Lesser Centaury	flowering plant	28/08/1993	28/02/2009	4
<i>Geranium columbinum</i>	Long-stalked Crane's-bill	flowering plant	31/08/1982	-	1
<i>Quercus robur</i>	Pedunculata Oak	flowering plant	31/12/1985	28/02/2009	13
<i>Fagus sylvatica</i>	Beech	flowering plant	12/07/1986	28/02/2009	3
<i>Castanea sativa</i>	Sweet Chestnut	flowering plant	12/07/1986	28/02/2009	7
<i>Aegopodium podagraria</i>	Ground-elder	flowering plant	31/12/1985	12/07/1986	2
<i>Angelica sylvestris</i>	Wild Angelica	flowering plant	31/08/1982	31/12/1985	2
<i>Anthriscus sylvestris</i>	Cow Parsley	flowering plant	31/12/1985	28/02/2009	3
<i>Chaerophyllum temulum</i>	Rough Chervil	flowering plant	31/12/1985	-	1
<i>Daucus carota subsp. carota</i>	Wild Carrot	flowering plant	12/07/1986	-	1

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<i>Heracleum sphondylium</i>	Hogweed	flowering plant	31/08/1982	28/02/2009	5
<i>Tilia cordata</i>	Small-leaved Lime	flowering plant	12/08/2001	-	1
<i>Cruciata laevipes</i>	Crosswort	flowering plant	31/12/1985	12/07/1986	2
<i>Linum catharticum</i>	Fairy Flax	flowering plant	12/07/1986	28/06/2010	2
<i>Malva sylvestris</i>	Common Mallow	flowering plant	31/12/1985	-	1
<i>Malva neglecta</i>	Dwarf Mallow	flowering plant	26/08/2006	-	1
<i>Malva moschata</i>	Musk-mallow	flowering plant	31/12/1985	28/02/2009	2
<i>Viola riviniana</i>	Common Dog-violet	flowering plant	31/12/1985	28/02/2009	3
<i>Viola</i>	Violet	flowering plant	31/08/1982	-	1
<i>Salix repens</i>	Creeping Willow	flowering plant	31/12/1970	-	2
<i>Salix cinerea subsp. oleifolia</i>	Rusty Willow	flowering plant	28/02/2009	-	1
<i>Salix cinerea</i>	Common Sallow	flowering plant	31/12/1985	28/02/2009	8
<i>Salix caprea</i>	Goat Willow	flowering plant	31/08/1982	28/02/2009	6
<i>Erodium cicutarium agg.</i>	Common Stork's-Bill	flowering plant	12/07/1986	-	1
<i>Populus tremula</i>	Aspen	flowering plant	12/07/1986	28/02/2009	2
<i>Pimpinella major</i>	Greater Burnet-saxifrage	flowering plant	31/08/1982	-	3
<i>Hypericum pulchrum</i>	Slender St John's-wort	flowering plant	31/12/1985	28/02/2009	4
<i>Hypericum perforatum</i>	Perforate St John's-wort	flowering plant	31/08/1982	28/02/2009	6
<i>Hypericum humifusum</i>	Trailing St John's-wort	flowering plant	31/12/1985	28/02/2009	4
<i>Mercurialis perennis</i>	Dog's Mercury	flowering plant	31/12/1985	28/02/2009	3
<i>Euphorbia helioscopia</i>	Sun Spurge	flowering plant	31/08/1982	-	1
<i>Euphorbia amygdaloides</i>	Wood Spurge	flowering plant	31/12/1985	-	1
<i>Geranium robertianum</i>	Herb-Robert	flowering plant	31/08/1982	28/02/2009	6
<i>Geranium pusillum</i>	Small-flowered Crane's-bill	flowering plant	26/08/2006	-	1
<i>Geranium molle</i>	Dove's-foot Crane's-bill	flowering plant	31/12/1985	28/02/2009	2
<i>Geranium dissectum</i>	Cut-leaved Crane's-bill	flowering plant	12/07/1986	28/02/2009	2
<i>Salix aurita</i>	Eared Willow	flowering plant	09/07/2004	-	2
<i>Lapsana communis</i>	Nipplewort	flowering plant	31/12/1985	28/02/2009	3
<i>Oenanthe crocata</i>	Hemlock Water-dropwort	flowering plant	28/02/2009	-	1
<i>Cirsium vulgare</i>	Spear thistle	flowering plant	31/08/1982	28/02/2009	6
<i>Crepis capillaris</i>	Smooth Hawk's-beard	flowering plant	31/12/1985	28/02/2009	3
<i>Erigeron acer</i>	Blue Fleabane	flowering plant	27/02/1954	12/07/1986	2
<i>Eupatorium cannabinum</i>	Hemp-agrimony	flowering plant	31/12/1985	12/07/1986	2
<i>Filago minima</i>	Small Cudweed	flowering plant	28/06/2010	-	1
<i>Gnaphalium uliginosum</i>	Marsh Cudweed	flowering plant	31/12/1985	28/06/2010	8
<i>Hieracium</i>	Hawkweed	flowering plant	31/12/1985	-	1
<i>Hieracium sabaudum</i>	Sharp-toothed Hawkweed	flowering plant	31/12/1985	-	1
<i>Cirsium arvense</i>	Creeping thistle	flowering plant	31/12/1985	28/02/2009	4
<i>Hypochaeris radicata</i>	Cat's-ear	flowering plant	31/08/1982	28/02/2009	6
<i>Cirsium acaule</i>	Dwarf Thistle	flowering plant	12/07/1986	-	1
<i>Leontodon autumnalis</i>	Autumn Hawkbit	flowering plant	31/08/1982	-	1
<i>Leontodon hispidus</i>	Rough Hawkbit	flowering plant	28/02/2009	-	1
<i>Leontodon saxatilis</i>	Lesser Hawkbit	flowering plant	31/12/1985	28/02/2009	4
<i>Leucanthemum vulgare</i>	Oxeye Daisy	flowering plant	31/12/1985	28/02/2009	3

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<i>Matricaria discoidea</i>	Pineappleweed	flowering plant	12/07/1986	-	1
<i>Matricaria recutita</i>	Scented Mayweed	flowering plant	31/08/1982	28/02/2009	4
<i>Mycelis muralis</i>	Wall Lettuce	flowering plant	09/07/2004	28/02/2009	2
<i>Picris echioides</i>	Bristly Oxtongue	flowering plant	31/12/1985	-	1
<i>Pilosella officinarum</i>	Mouse-ear-hawkweed	flowering plant	31/12/1985	28/02/2009	2
<i>Lycopus europaeus</i>	Gypsywort	flowering plant	31/12/1985	09/07/2004	3
<i>Hieracium umbellatum</i>	Hawkweed	flowering plant	12/08/2001	28/02/2009	2
<i>Dactylorhiza fuchsii</i>	Common Spotted-orchid	flowering plant	31/12/1985	28/02/2009	3
<i>Sison amomum</i>	Stone Parsley	flowering plant	12/07/1986	-	1
<i>Torilis japonica</i>	Upright Hedge-parsley	flowering plant	31/12/1985	12/07/1986	2
<i>Hedera helix</i>	Ivy	flowering plant	31/12/1985	28/02/2009	3
<i>Hydrocotyle vulgaris</i>	Marsh Pennywort	flowering plant	31/12/1985	28/06/2010	4
<i>Ilex aquifolium</i>	Holly	flowering plant	31/12/1985	28/02/2009	5
<i>Convallaria majalis</i>	Lily-of-the-valley	flowering plant	26/08/2006	-	1
<i>Hyacinthoides non-scripta</i>	Bluebell	flowering plant	31/08/1982	28/02/2009	4
<i>Polygonatum multiflorum</i>	Solomon's-seal	flowering plant	12/07/1986	-	1
<i>Crocosmia pottsii x aurea = C. x crocosmiiflor</i>	Montbretia	flowering plant	28/02/2009	-	1
<i>Cirsium palustre</i>	Marsh Thistle	flowering plant	31/08/1982	28/02/2009	8
<i>Iris pseudacorus</i>	Yellow Iris	flowering plant	31/12/1985	-	1
<i>Radiola linoides</i>	Allseed	flowering plant	16/07/1983	30/09/1998	8
<i>Dactylorhiza incarnata subsp. pulchella</i>	Early Marsh-Orchid	flowering plant	31/12/1988	-	1
<i>Epipactis helleborine</i>	Broad-leaved Helleborine	flowering plant	28/02/2009	-	1
<i>Achillea millefolium</i>	Yarrow	flowering plant	31/08/1982	28/02/2009	7
<i>Arctium</i>	Burdock	flowering plant	12/07/1986	-	1
<i>Arctium minus</i>	Lesser Burdock	flowering plant	31/08/1982	28/02/2009	4
<i>Artemisia vulgaris</i>	Mugwort	flowering plant	31/12/1985	28/02/2009	3
<i>Aster novi-belgii</i>	Confused Michaelmas-daisy	flowering plant	31/12/1985	-	1
<i>Bellis perennis</i>	Daisy	flowering plant	31/08/1982	28/02/2009	4
<i>Centaurea nigra</i>	Common Knapweed	flowering plant	31/12/1985	28/02/2009	4
<i>Chamaemelum nobile</i>	Chamomile	flowering plant	31/12/1981	16/07/2008	8
<i>Iris germanica</i>	Bearded Iris	flowering plant	31/12/1985	-	1
<i>Tilia platyphyllos x cordata = T. x europaea</i>	Lime	flowering plant	12/07/1986	28/02/2009	2
<i>Rumex acetosella</i>	Sheep's Sorrel	flowering plant	31/12/1985	28/06/2010	9
<i>Rumex acetosa</i>	Common Sorrel	flowering plant	31/12/1985	28/02/2009	2
<i>Polygonum aviculare</i>	Knotgrass	flowering plant	31/12/1985	07/09/1993	2
<i>Polygonum aviculare agg.</i>	Knotgrass agg.	flowering plant	12/07/1986	-	1
<i>Persicaria maculosa</i>	Redshank	flowering plant	31/12/1985	-	1
<i>Persicaria hydropiper</i>	Water-pepper	flowering plant	31/08/1982	28/02/2009	6
<i>Fallopia japonica</i>	Japanese Knotweed	flowering plant	28/02/2009	-	1
<i>Drosera rotundifolia</i>	Round-leaved Sundew	flowering plant	27/02/1954	28/06/2010	22
<i>Drosera intermedia</i>	Oblong-leaved Sundew	flowering plant	31/12/1970	28/06/2010	20
<i>Sagina apetala subsp. apetala</i>	Annual Pearlwort	flowering plant	31/12/1991	-	1
<i>Stellaria media</i>	Common Chickweed	flowering plant	12/07/1986	28/02/2009	2
<i>Rumex hydrolapathum</i>	Water Dock	flowering plant	31/08/1982	-	1

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<i>Stellaria graminea</i>	Lesser Stitchwort	flowering plant	31/08/1982	28/06/2010	5
<i>Spergularia rubra</i>	Sand Spurrey	flowering plant	31/12/1985	-	1
<i>Spergula arvensis</i>	Corn Spurrey	flowering plant	12/07/1986	-	1
<i>Silene vulgaris</i>	Bladder Campion	flowering plant	12/07/1986	28/06/2010	2
<i>Silene latifolia x dioica = S. x hampeana</i>	Hybrid Campion	flowering plant	28/02/2009	-	1
<i>Silene latifolia</i>	White Campion	flowering plant	31/08/1982	28/02/2009	4
<i>Silene flos-cuculi</i>	Ragged-Robin	flowering plant	31/12/1985	28/02/2009	4
<i>Silene dioica</i>	Red Campion	flowering plant	31/12/1985	28/02/2009	4
<i>Sagina procumbens</i>	Procumbent Pearlwort	flowering plant	31/12/1985	28/02/2009	6
<i>Sagina apetala subsp. erecta</i>	Fringed Pearlwort	flowering plant	12/07/1986	-	1
<i>Hypericum tetrapterum</i>	Square-stalked St John's-wort	flowering plant	31/12/1985	28/02/2009	3
<i>Anagallis arvensis</i>	Scarlet Pimpernel	flowering plant	31/08/1982	28/02/2009	5
<i>Lamium purpureum</i>	Red Dead-nettle	flowering plant	31/12/1985	-	2
<i>Lamium galeobdolon</i>	Yellow Archangel	flowering plant	28/02/2009	-	1
<i>Lamium album</i>	White Dead-nettle	flowering plant	31/08/1982	31/12/1985	2
<i>Glechoma hederacea</i>	Ground-ivy	flowering plant	31/08/1982	28/02/2009	11
<i>Galeopsis tetrahit</i>	Common Hemp-nettle	flowering plant	31/08/1982	31/12/1985	2
<i>Galeopsis tetrahit agg.</i>	Common Hemp-Nettle agg.	flowering plant	12/07/1986	-	1
<i>Clinopodium vulgare</i>	Wild Basil	flowering plant	27/02/1954	-	1
<i>Ajuga reptans</i>	Bugle	flowering plant	31/08/1982	28/02/2009	5
<i>Primula vulgaris</i>	Primrose	flowering plant	31/12/1985	28/02/2009	3
<i>Lysimachia punctata</i>	Dotted Loosestrife	flowering plant	28/02/2009	-	1
<i>Rumex acetosella subsp. acetosella</i>	Sheep's Sorrel	flowering plant	12/07/1986	-	1
<i>Anagallis minima</i>	Chaffweed	flowering plant	31/12/1985	30/09/1998	4
<i>Rumex crispus</i>	Curled Dock	flowering plant	31/12/1985	12/07/1986	2
<i>Vaccinium myrtillus</i>	Bilberry	flowering plant	27/02/1954	-	1
<i>Rhododendron ponticum</i>	Rhododendron	flowering plant	27/02/1954	28/02/2009	10
<i>Senecio erucifolius</i>	Hoary Ragwort	flowering plant	12/07/1986	-	1
<i>Erica tetralix</i>	Cross-leaved Heath	flowering plant	27/02/1954	28/06/2010	34
<i>Pulicaria dysenterica</i>	Common Fleabane	flowering plant	31/08/1982	28/02/2009	5
<i>Erica cinerea</i>	Bell Heather	flowering plant	27/02/1954	28/06/2010	19
<i>Calluna vulgaris</i>	Heather	flowering plant	27/02/1954	28/02/2009	29
<i>Rumex sanguineus</i>	Wood Dock	flowering plant	31/08/1982	28/02/2009	7
<i>Rumex obtusifolius</i>	Broad-leaved Dock	flowering plant	31/08/1982	28/02/2009	3
<i>Stellaria holostea</i>	Greater Stitchwort	flowering plant	31/12/1985	28/02/2009	3
<i>Lysimachia nemorum</i>	Yellow Pimpernel	flowering plant	31/12/1985	28/02/2009	4
<i>Anemone nemorosa</i>	Wood Anemone	flowering plant	31/08/1982	-	1
<i>Solanum dulcamara</i>	Bittersweet	flowering plant	31/12/1985	28/02/2009	3
<i>Cuscuta epithymum</i>	Dodder	flowering plant	31/12/1985	28/02/2009	5
<i>Calystegia sepium subsp. sepium</i>	Great Bindweed	flowering plant	12/07/1986	-	1
<i>Calystegia sepium</i>	Hedge Bindweed	flowering plant	31/12/1985	-	1
<i>Acer pseudoplatanus</i>	Sycamore	flowering plant	31/12/1985	28/02/2009	4
<i>Acer campestre</i>	Field Maple	flowering plant	31/12/1985	-	1
<i>Ranunculus repens</i>	Creeping Buttercup	flowering plant	31/08/1982	28/02/2009	7

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<i>Ranunculus flammula</i>	Lesser Spearwort	flowering plant	31/12/1985	28/02/2009	4
<i>Ranunculus ficaria</i>	Lesser Celandine	flowering plant	31/12/1985	28/02/2009	2
<i>Solanum nigrum</i>	Black Nightshade	flowering plant	31/12/2002	28/02/2009	2
<i>Sagina apetala</i>	Annual Pearlwort	flowering plant	07/09/1993	28/02/2009	2
<i>Clematis vitalba</i>	Traveller's-joy	flowering plant	12/07/1986	-	1
<i>Drosera anglica</i>	Great Sundew	flowering plant	27/02/1954	-	2
<i>Chelidonium majus</i>	Greater Celandine	flowering plant	28/02/2009	-	1
<i>Oxalis articulata</i>	Pink-sorrel	flowering plant	12/07/1980	-	2
<i>Epilobium obscurum</i>	Short-fruited Willowherb	flowering plant	12/07/1986	-	1
<i>Epilobium montanum</i>	Broad-leaved Willowherb	flowering plant	31/12/1985	28/02/2009	4
<i>Epilobium hirsutum</i>	Great Willowherb	flowering plant	31/12/1985	28/02/2009	3
<i>Epilobium ciliatum</i>	American Willowherb	flowering plant	31/12/1985	28/02/2009	3
<i>Circaea lutetiana</i>	Enchanter's-nightshade	flowering plant	31/08/1982	28/02/2009	5
<i>Chamerion angustifolium</i>	Rosebay Willowherb	flowering plant	31/08/1982	28/02/2009	8
<i>Lythrum portula</i>	Water-purslane	flowering plant	31/12/1985	28/02/2009	8
<i>Ranunculus acris</i>	Meadow Buttercup	flowering plant	31/12/1985	28/02/2009	2
<i>Sisymbrium officinale</i>	Hedge Mustard	flowering plant	31/12/1985	-	1
<i>Papaver rhoeas</i>	Common Poppy	flowering plant	31/12/1985	-	1
<i>Solanum villosum</i>	Red Nightshade	flowering plant	31/08/1982	-	1
<i>Cerastium glomeratum</i>	Sticky Mouse-ear	flowering plant	31/12/1985	28/06/2010	3
<i>Cerastium fontanum</i>	Common Mouse-ear	flowering plant	31/08/1982	28/02/2009	6
<i>Arenaria serpyllifolia</i>	Thyme-Leaved Sandwort	flowering plant	31/12/1985	28/02/2009	2
<i>Reseda luteola</i>	Weld	flowering plant	31/12/1985	-	1
<i>Moehringia trinervia</i>	Three-nerved Sandwort	flowering plant	31/12/1985	09/07/2004	3
<i>Lepidium didymum</i>	Lesser Swine-cress	flowering plant	31/12/1985	12/07/1986	2
<i>Cardamine pratensis</i>	Cuckooflower	flowering plant	31/08/1982	31/12/1985	2
<i>Cardamine hirsuta</i>	Hairy Bitter-cress	flowering plant	31/12/1985	-	1
<i>Cardamine flexuosa</i>	Wavy Bitter-cress	flowering plant	31/12/1985	28/02/2009	2
<i>Capsella bursa-pastoris</i>	Shepherd's-purse	flowering plant	31/08/1982	-	1
<i>Echium vulgare</i>	Viper's-bugloss	flowering plant	31/12/1985	-	1
<i>Barbarea vulgaris</i>	Winter-cress	flowering plant	31/12/1985	-	1
<i>Anchusa arvensis</i>	Bugloss	flowering plant	31/12/1985	-	1
<i>Alliaria petiolata</i>	Garlic Mustard	flowering plant	31/12/1985	28/02/2009	3
<i>Arum maculatum</i>	Lords-and-Ladies	flowering plant	31/12/1985	28/02/2009	3
<i>Pulmonaria officinalis</i>	Lungwort	flowering plant	28/02/2009	-	1
<i>Myosotis sylvatica</i>	Wood Forget-me-not	flowering plant	31/12/1985	08/05/2005	2
<i>Atriplex patula</i>	Common Orache	flowering plant	28/02/2009	-	1
<i>Myosotis ramosissima</i>	Early Forget-me-not	flowering plant	31/12/1985	09/07/2004	2
<i>Myosotis discolor</i>	Changing Forget-me-not	flowering plant	31/12/1985	28/02/2009	2
<i>Myosotis arvensis</i>	Field Forget-me-not	flowering plant	31/08/1982	28/02/2009	5
<i>Limax maximus</i>	Leopard Slug	mollusc	03/04/1989	-	1
<i>Pisaura mirabilis</i>	Nursery-Web Spider	spider (Araneae)	13/06/2007	17/08/2007	3
<i>Keijia tinctoria</i>		spider (Araneae)	13/06/2007	31/05/2012	3
<i>Tibellus oblongus</i>		spider (Araneae)	13/06/2007	17/08/2007	2

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<i>Evarcha arcuata</i>		spider (Araneae)	31/12/1988	17/08/2007	4
<i>Heliophanus cupreus</i>		spider (Araneae)	31/05/2012	-	2
<i>Heliophanus flavipes</i>		spider (Araneae)	13/06/2007	17/08/2007	2
<i>Marpissa muscosa</i>		spider (Araneae)	31/12/1988	13/06/2007	2
<i>Salticus cingulatus</i>		spider (Araneae)	13/06/2007	-	1
<i>Micrommata virescens</i>	Green Spider	spider (Araneae)	31/12/1985	-	1
<i>Metellina</i>		spider (Araneae)	08/09/1985	-	1
<i>Metellina segmentata</i>		spider (Araneae)	17/08/2007	-	1
<i>Enoplognatha ovata</i>		spider (Araneae)	17/08/2007	-	1
<i>Euophrys frontalis</i>		spider (Araneae)	13/06/2007	-	1
<i>Kochiura aulica</i>		spider (Araneae)	13/06/2007	17/08/2007	3
<i>Neottiura bimaculata</i>		spider (Araneae)	13/06/2007	-	1
<i>Paidiscura pallens</i>		spider (Araneae)	13/06/2007	-	1
<i>Phylloneta impressum</i>		spider (Araneae)	13/06/2007	17/08/2007	3
<i>Phylloneta sisyphia</i>		spider (Araneae)	13/06/2007	31/05/2012	2
<i>Simitidion simile</i>		spider (Araneae)	13/06/2007	12/05/2012	5
<i>Theridion varians</i>		spider (Araneae)	13/06/2007	-	1
<i>Misumena vatia</i>		spider (Araneae)	17/08/2007	-	1
<i>Ozyptila atomaria</i>		spider (Araneae)	13/06/2007	-	1
<i>Thomisus onustus</i>		spider (Araneae)	31/12/1985	21/06/2013	2
<i>Zora spinimana</i>		spider (Araneae)	13/06/2007	-	1
<i>Xysticus lanio</i>		spider (Araneae)	31/05/2012	-	1
<i>Philodromus histrio</i>		spider (Araneae)	17/08/2007	28/09/2013	2
<i>Xysticus cristatus</i>		spider (Araneae)	13/06/2007	17/08/2007	3
<i>Clubiona trivialis</i>		spider (Araneae)	13/06/2007	-	1
<i>Pardosa palustris</i>		spider (Araneae)	13/06/2007	-	1
<i>Pardosa nigriceps</i>		spider (Araneae)	13/06/2007	-	1
<i>Hygrolycosa rubrofasciata</i>		spider (Araneae)	31/05/2012	-	1
<i>Microlinyphia pusilla</i>		spider (Araneae)	13/06/2007	-	1
<i>Microlinyphia impigra</i>		spider (Araneae)	13/06/2007	-	1
<i>Meioneta rurestris</i>		spider (Araneae)	13/06/2007	-	1
<i>Gonatium rubens</i>		spider (Araneae)	13/06/2007	-	1
<i>Erigone dentipalpis</i>		spider (Araneae)	13/06/2007	-	1
<i>Pardosa saltans</i>		spider (Araneae)	13/06/2007	-	1
<i>Dictyna latens</i>		spider (Araneae)	13/06/2007	17/08/2007	4
<i>Zelotes petrensis</i>		spider (Araneae)	25/10/2012	-	1
<i>Mangora acalypha</i>		spider (Araneae)	13/06/2007	17/08/2007	4
<i>Hypososinga pygmaea</i>		spider (Araneae)	13/06/2007	-	1
<i>Gibbaranea gibbosa</i>		spider (Araneae)	13/06/2007	-	1
<i>Araniella displicata</i>		spider (Araneae)	19/09/2012	28/09/2013	2
<i>Araneus quadratus</i>		spider (Araneae)	13/06/2007	17/08/2007	3
<i>Araneus diadematus</i>	Garden Orb-Web Spider	spider (Araneae)	08/09/1985	28/09/2013	6
<i>Philodromus cespitum</i>		spider (Araneae)	13/06/2007	28/05/2012	2
<i>Agelena labyrinthica</i>	Labyrinth Spider	spider (Araneae)	13/06/2007	17/08/2007	3

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<i>Agalenatea redii</i>		spider (Araneae)	17/08/2007	-	2
<i>Erigone atra</i>		spider (Araneae)	13/06/2007	-	2
<i>Cheiracanthium erraticum</i>		spider (Araneae)	31/05/2012	-	2
<i>Pirata latitans</i>		spider (Araneae)	21/06/2013	-	1
<i>Xerolycosa miniata</i>		spider (Araneae)	25/10/2012	-	1
<i>Cheiracanthium virescens</i>		spider (Araneae)	13/06/2007	25/10/2012	2
<i>Ero tuberculata</i>		spider (Araneae)	19/09/2012	28/09/2013	2
<i>Dictyna arundinacea</i>		spider (Araneae)	13/06/2007	17/08/2007	4
<i>Philodromus aureolus</i>		spider (Araneae)	13/06/2007	-	1
<i>Leiobunum blackwalli</i>		harvestman (Opiliones)	25/10/2012	-	1
<i>Oligolophus tridens</i>		harvestman (Opiliones)	25/10/2012	-	1
<i>Oniscus asellus</i>	Common Shiny Woodlouse	crustacean	16/06/1985	08/09/1985	2
<i>Philoscia muscorum</i>	Common Striped Woodlouse	crustacean	16/06/1985	-	1
<i>Porcellio scaber</i>	Common Rough Woodlouse	crustacean	16/06/1985	-	1
<i>Orthetrum coerulescens</i>	Keeled Skimmer	insect - dragonfly (Odonata)	20/08/2005	04/08/2013	2
<i>Libellula quadrimaculata</i>	Four-spotted Chaser	insect - dragonfly (Odonata)	31/12/1973	05/06/2013	15
<i>Libellula depressa</i>	Broad-bodied Chaser	insect - dragonfly (Odonata)	28/06/2010	-	1
<i>Lestes sponsa</i>	Emerald Damselfly	insect - dragonfly (Odonata)	31/12/1973	30/07/2014	5
<i>Sympetrum danae</i>	Black Darter	insect - dragonfly (Odonata)	31/12/1973	30/07/2014	6
<i>Aeshna cyanea</i>	Southern Hawker	insect - dragonfly (Odonata)	08/09/1985	30/07/2014	5
<i>Cordulia aenea</i>	Downy Emerald	insect - dragonfly (Odonata)	28/05/1989	28/06/2010	4
<i>Ischnura elegans</i>	Blue-tailed Damselfly	insect - dragonfly (Odonata)	04/09/1988	-	2
<i>Pyrrosoma nymphula</i>	Large Red Damselfly	insect - dragonfly (Odonata)	20/05/1989	31/05/2012	9
<i>Aeshna grandis</i>	Brown Hawker	insect - dragonfly (Odonata)	04/09/1988	31/07/2007	3
<i>Anax imperator</i>	Emperor Dragonfly	insect - dragonfly (Odonata)	31/12/1973	31/07/2007	6
<i>Calopteryx virgo</i>	Beautiful Demoiselle	insect - dragonfly (Odonata)	31/07/2007	-	1
<i>Ceriagrion tenellum</i>	Small Red Damselfly	insect - dragonfly (Odonata)	07/09/2003	-	1
<i>Coenagrion puella</i>	Azure Damselfly	insect - dragonfly (Odonata)	20/05/1989	28/06/2010	10
<i>Enallagma cyathigerum</i>	Common Blue Damselfly	insect - dragonfly (Odonata)	31/12/1973	28/06/2010	4
<i>Sympetrum striolatum</i>	Common Darter	insect - dragonfly (Odonata)	08/09/1985	04/08/2013	5
<i>Omocestus rufipes</i>	Woodland Grasshopper	insect - orthopteran	31/12/1985	26/08/2010	7
<i>Pholidoptera griseoaptera</i>	Dark Bush-cricket	insect - orthopteran	31/12/1985	31/12/1988	2
<i>Myrmeleotettix maculatus</i>	Mottled Grasshopper	insect - orthopteran	31/12/1985	07/09/2003	6
<i>Conocephalus fuscus</i>	Long-winged Cone-head	insect - orthopteran	07/09/2003	-	1
<i>Chorthippus parallelus</i>	Meadow Grasshopper	insect - orthopteran	08/09/1985	07/09/2003	5
<i>Metrioptera brachyptera</i>	Bog Bush-cricket	insect - orthopteran	08/09/1985	26/08/2010	8
<i>Omocestus viridulus</i>	Common Green Grasshopper	insect - orthopteran	31/12/1985	07/09/2003	4
<i>Meconema thalassinum</i>	Oak Bush-cricket	insect - orthopteran	31/12/1985	31/12/1988	2
<i>Leptophyes punctatissima</i>	Speckled Bush-cricket	insect - orthopteran	31/12/1985	28/09/2013	5
<i>Tetrix undulata</i>	Common Ground-hopper	insect - orthopteran	31/12/1985	31/05/2012	7
<i>Chorthippus brunneus</i>	Field Grasshopper	insect - orthopteran	08/09/1985	31/12/1988	3
<i>Forficula auricularia</i>	Common Earwig	insect - earwig (Dermaptera)	31/12/1985	07/09/2003	2
<i>Ectobius pallidus</i>	Tawny Cockroach	insect - cockroach (Dictyoptera)	31/12/1988	-	2
<i>Ectobius lapponicus</i>	Dusky Cockroach	insect - cockroach (Dictyoptera)	31/12/1985	07/09/2003	4

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<i>Stygnocoris sabulosus</i>		insect - true bug (Hemiptera)	07/09/2003	-	2
<i>Capsus ater</i>		insect - true bug (Hemiptera)	07/09/2003	-	1
<i>Halticus luteicollis</i>		insect - true bug (Hemiptera)	15/07/2011	-	1
<i>Scolopostethus decoratus</i>		insect - true bug (Hemiptera)	07/09/2003	25/10/2012	3
<i>Rhyparochromus pini</i>		insect - true bug (Hemiptera)	31/12/1993	31/05/2012	4
<i>Monalocoris (Monalocoris) filicis</i>	Bracken Bug	insect - true bug (Hemiptera)	31/08/1982	-	1
<i>Orthotylus (Litocoris) ericetorum</i>		insect - true bug (Hemiptera)	31/12/1993	07/09/2003	3
<i>Phytocoris (Ktenocoris) varipes</i>		insect - true bug (Hemiptera)	31/12/1993	-	1
<i>Plagiognathus (Plagiognathus) arbustorum</i>		insect - true bug (Hemiptera)	07/09/2003	-	1
<i>Stenodema (Brachystira) calcarata</i>		insect - true bug (Hemiptera)	31/12/1993	07/09/2003	2
<i>Himacerus (Himacerus) apterus</i>	Tree Damsel Bug	insect - true bug (Hemiptera)	25/10/2012	-	1
<i>Nabis (Nabis) ericetorum</i>	Heath Damselbug	insect - true bug (Hemiptera)	31/12/1985	07/09/2003	4
<i>Nysius helveticus</i>		insect - true bug (Hemiptera)	07/09/2003	-	1
<i>Palomena prasina</i>	Green Shieldbug	insect - true bug (Hemiptera)	31/08/1982	31/12/1985	2
<i>Pentatoma rufipes</i>	Forest Bug	insect - true bug (Hemiptera)	31/12/1985	-	1
<i>Picromerus bidens</i>	Spiked Shieldbug	insect - true bug (Hemiptera)	31/12/1985	07/09/2003	2
<i>Piezodorus lituratus</i>	Gorse Shieldbug	insect - true bug (Hemiptera)	31/12/1985	31/05/2012	2
<i>Coranus (Coranus) subapterus</i>	Heath Assassin Bug	insect - true bug (Hemiptera)	07/09/2003	-	1
<i>Nabis (Nabis) rugosus</i>	Common Damselbug	insect - true bug (Hemiptera)	31/12/1985	-	1
<i>Graphocephala fennahi</i>	Rhododendron Leafhopper	insect - true bug (Hemiptera)	10/10/2011	-	1
<i>Philaenus spumarius</i>	Cuckoo-Spit Insect	insect - true bug (Hemiptera)	31/12/1985	-	1
<i>Aphrophora salicina</i>		insect - true bug (Hemiptera)	31/12/1985	-	1
<i>Aphrophora alni</i>		insect - true bug (Hemiptera)	07/09/2003	-	1
<i>Anthocoris nemorum</i>	Common Flower Bug	insect - true bug (Hemiptera)	31/12/1985	-	1
<i>Saldula saltatoria</i>	Common Shorebug	insect - true bug (Hemiptera)	31/12/1985	-	1
<i>Myrmus miriformis</i>		insect - true bug (Hemiptera)	31/12/1985	-	1
<i>Alydus calcaratus</i>		insect - true bug (Hemiptera)	31/12/1985	07/09/2003	3
<i>Elasmotethus interstinctus</i>	Birch Shieldbug	insect - true bug (Hemiptera)	07/09/2003	-	1
<i>Acanthosoma haemorrhoidale</i>	Hawthorn Shieldbug	insect - true bug (Hemiptera)	31/12/1985	-	1
<i>Eupteryx aurata</i>		insect - true bug (Hemiptera)	31/12/1985	-	1
<i>Kleidocerys resedae</i>	Birch Catkin Bug	insect - true bug (Hemiptera)	07/09/2003	28/05/2012	2
<i>Cixius nervosus</i>		insect - true bug (Hemiptera)	31/12/1985	07/09/2003	2
<i>Tachycixius pilosus</i>		insect - true bug (Hemiptera)	31/05/2012	-	1
<i>Coreus marginatus</i>	Dock Bug	insect - true bug (Hemiptera)	31/12/1985	03/07/2014	4
<i>Cymus claviculus</i>		insect - true bug (Hemiptera)	31/12/1993	-	1
<i>Cymus melanocephalus</i>		insect - true bug (Hemiptera)	31/12/1993	-	1
<i>Gastrodes grossipes</i>	Pine Cone Bug	insect - true bug (Hemiptera)	31/12/1985	16/07/2014	2
<i>Heterogaster urticae</i>	Nettle Groundbug	insect - true bug (Hemiptera)	31/12/1985	-	1
<i>Kleidocerys ericae</i>		insect - true bug (Hemiptera)	07/09/2003	-	2
<i>Ulopa reticulata</i>		insect - true bug (Hemiptera)	07/09/2003	28/05/2012	2
<i>Cicadella viridis</i>		insect - true bug (Hemiptera)	31/12/1985	-	1
<i>Cercopis vulnerata</i>		insect - true bug (Hemiptera)	16/06/1985	31/12/1985	2
<i>Dichochrysa prasina</i>		insect - lacewing (Neuroptera)	19/09/2012	-	1
<i>Chrysoperla carnea group</i>		insect - lacewing (Neuroptera)	08/09/1985	-	1

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<i>Chrysopa perla</i>		insect - lacewing (Neuroptera)	16/06/1985	-	1
<i>Corticara gibbosa</i>		insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Rhizophagus (Rhizophagus) bipustulatus</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Melolontha melolontha</i>	Common Cockchafer	insect - beetle (Coleoptera)	14/05/2012	13/06/2012	2
<i>Melandrya caraboides</i>		insect - beetle (Coleoptera)	20/05/1998	-	1
<i>Malachius bipustulatus</i>	Malachite Beetle	insect - beetle (Coleoptera)	16/06/1985	31/05/1999	3
<i>Axinotarsus marginalis</i>		insect - beetle (Coleoptera)	31/12/1985	13/06/2007	3
<i>Sinodendron cylindricum</i>	Rhinoceros Beetle	insect - beetle (Coleoptera)	31/12/1985	31/05/1999	3
<i>Litargus connexus</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Enicmus transversus</i>		insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Meligethes aeneus</i>	Common Pollen Beetle	insect - beetle (Coleoptera)	20/05/1998	-	1
<i>Cartodere (Aridius) nodifer</i>		insect - beetle (Coleoptera)	31/12/1989	31/05/1996	2
<i>Cartodere (Aridius) bifasciata</i>		insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Lampyris noctiluca</i>	Glow-worm	insect - beetle (Coleoptera)	30/12/1899	16/07/2006	5
<i>Dorcus parallelipipedus</i>	Lesser Stag Beetle	insect - beetle (Coleoptera)	31/12/1989	31/05/1999	3
<i>Megasternum concinnum</i>		insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Dieckmanniellus gracilis</i>		insect - beetle (Coleoptera)	31/12/1985	16/07/1996	5
<i>Paromalus flavicornis</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Pocadius ferrugineus</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Oedemera (Oedemera) lurida</i>		insect - beetle (Coleoptera)	31/12/1985	13/06/2007	3
<i>Oedemera (Oedemera) nobilis</i>	Swollen-thighed Beetle	insect - beetle (Coleoptera)	31/12/1985	13/06/2007	3
<i>Olibrus aeneus</i>		insect - beetle (Coleoptera)	31/05/1996	07/09/2003	2
<i>Ptenidium (Gressnerium) gressneri</i>		insect - beetle (Coleoptera)	30/05/1996	-	1
<i>Pyrochroa coccinea</i>	Black-headed Cardinal Beetle	insect - beetle (Coleoptera)	31/12/1985	31/12/1989	2
<i>Deporaus (Caenorhinus) mannerheimii</i>		insect - beetle (Coleoptera)	31/05/2012	-	1
<i>Deporaus (Deporaus) betulae</i>	Birch Leaf Roller	insect - beetle (Coleoptera)	31/12/1989	09/05/1999	2
<i>Temnocerus nanus</i>		insect - beetle (Coleoptera)	07/09/2003	13/06/2007	2
<i>Metoecus paradoxus</i>		insect - beetle (Coleoptera)	19/09/2012	-	1
<i>Mycetophagus quadripustulatus</i>		insect - beetle (Coleoptera)	31/12/1989	16/09/2003	2
<i>Denticollis linearis</i>		insect - beetle (Coleoptera)	31/12/1989	31/05/1999	2
<i>Smicronyx jungermanniae</i>		insect - beetle (Coleoptera)	07/09/2003	-	1
<i>Zeugophora subspinosa</i>		insect - beetle (Coleoptera)	07/09/2003	-	1
<i>Tachyerges stigma</i>		insect - beetle (Coleoptera)	13/06/2007	-	1
<i>Tychius pusillus</i>		insect - beetle (Coleoptera)	24/08/1986	-	1
<i>Xyleborus dispar</i>	Ambrosia Beetle	insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Dasytes aeratus</i>		insect - beetle (Coleoptera)	31/05/2012	-	1
<i>Agabus</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Agabus (Gaurodytes) bipustulatus</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Actenicerus sjaelandicus</i>	Marsh Click Beetle	insect - beetle (Coleoptera)	03/05/1997	-	2
<i>Ampedus balteatus</i>		insect - beetle (Coleoptera)	31/12/1989	31/05/2012	5
<i>Ampedus cinnabarinus</i>		insect - beetle (Coleoptera)	31/12/1985	-	1
<i>Ampedus elongantulus</i>		insect - beetle (Coleoptera)	13/06/2007	-	1
<i>Helophorus (Helophorus) obscurus</i>		insect - beetle (Coleoptera)	31/05/1996	20/05/1998	2
<i>Athous (Athous) haemorrhoidalis</i>		insect - beetle (Coleoptera)	31/12/1985	13/06/2007	5

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<i>Helophorus (Megahelophorus) grandis</i>		insect - beetle (Coleoptera)	03/05/1997	-	1
<i>Hemicrepidius hirtus</i>		insect - beetle (Coleoptera)	16/07/2014	-	1
<i>Melanotus villosus</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Dacne bipustulata</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Dacne rufifrons</i>		insect - beetle (Coleoptera)	16/09/2003	-	2
<i>Tritoma bipustulata</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Geotrupes spiniger</i>		insect - beetle (Coleoptera)	31/12/1985	-	1
<i>Trypocopris pyrenaicus</i>		insect - beetle (Coleoptera)	31/12/1975	31/12/1984	2
<i>Typhaeus typhoeus</i>	Minotaur Beetle	insect - beetle (Coleoptera)	31/12/1973	07/09/2003	4
<i>Abraeus perpusillus</i>		insect - beetle (Coleoptera)	31/05/1996	31/05/1999	2
<i>Cyphon padi</i>		insect - beetle (Coleoptera)	03/05/1997	-	1
<i>Helophorus (Helophorus) minutus</i>		insect - beetle (Coleoptera)	20/05/1998	-	1
<i>Hoplia philanthus</i>	Welsh Chafer	insect - beetle (Coleoptera)	13/06/2007	-	1
<i>Ampedus sanguinolentus</i>		insect - beetle (Coleoptera)	31/12/1984	01/05/2007	2
<i>Stenopterapion (Cobosiotherium) scutellare</i>		insect - beetle (Coleoptera)	07/09/2003	31/05/2012	3
<i>Stenus (Metatesnus) picipes</i>		insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Stenus (Stenus) boops</i>		insect - beetle (Coleoptera)	03/05/1997	-	1
<i>Stenus (Stenus) providus</i>		insect - beetle (Coleoptera)	20/05/1998	-	1
<i>Stenus (Stenus) brunripes</i>		insect - beetle (Coleoptera)	31/05/1996	20/05/1998	2
<i>Tachyporus hypnorum</i>		insect - beetle (Coleoptera)	31/12/1989	31/05/1996	2
<i>Tachyporus obtusus</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Eledona agricola</i>		insect - beetle (Coleoptera)	16/09/2003	-	1
<i>Cantharis rufa</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Cantharis nigra</i>		insect - beetle (Coleoptera)	07/09/2003	-	1
<i>Cantharis livida</i>		insect - beetle (Coleoptera)	31/12/1985	31/12/1989	2
<i>Cantharis lateralis</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Phyllopertha horticola</i>	Garden Chafer	insect - beetle (Coleoptera)	31/12/1985	29/05/2009	2
<i>Attelabus nitens</i>	Oak Leaf-roller	insect - beetle (Coleoptera)	09/05/1999	-	1
<i>Stenus (Hemistenus) aceris</i>		insect - beetle (Coleoptera)	20/05/1998	-	1
<i>Protapion apricans</i>	Clover Seed Weevil	insect - beetle (Coleoptera)	07/09/2003	-	1
<i>Nalassus laevioctostriatus</i>		insect - beetle (Coleoptera)	31/12/1989	28/09/2013	4
<i>Hallomenus binotatus</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Bitoma crenata</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Pycnomerus fuliginosus</i>		insect - beetle (Coleoptera)	31/12/1989	31/05/1999	3
<i>Perapion (Perapion) marchicum</i>		insect - beetle (Coleoptera)	31/12/1993	-	1
<i>Ischnopterapion (Ischnopterapion) loti</i>		insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Exapion (Ulapion) ulicis</i>	Gorse Weevil	insect - beetle (Coleoptera)	07/09/2003	31/05/2012	2
<i>Catapion pubescens</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Aphodius (Acrossus) rufipes</i>		insect - beetle (Coleoptera)	31/12/1985	-	1
<i>Platystomos albinus</i>		insect - beetle (Coleoptera)	01/05/2007	-	1
<i>Euglenes oculatus</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Cantharis cryptica</i>		insect - beetle (Coleoptera)	09/05/1999	07/09/2003	3
<i>Mocyta fungi</i>		insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Cyphon ochraceus</i>		insect - beetle (Coleoptera)	31/05/1996	-	1

Latin Name	Common Name	Taxon Group	First Date	Last Date	No. of Rec's
<i>Smicronyx coecus</i>		insect - beetle (Coleoptera)	07/09/2003	-	1
<i>Anaspis (Anaspis) maculata</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Silvanus unidentatus</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Sphindus dubius</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Aloconota (Aloconota) gregaria</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Atheta liturata</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Erichsonius cinerascens</i>		insect - beetle (Coleoptera)	03/05/1997	-	2
<i>Euplectus</i>		insect - beetle (Coleoptera)	09/05/1999	-	1
<i>Euplectus infirmus</i>		insect - beetle (Coleoptera)	31/05/1999	-	1
<i>Gabrius splendidulus</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Lathrobium (Tetartopeus) terminatum</i>		insect - beetle (Coleoptera)	31/05/1996	20/05/1998	2
<i>Stenus (Hypostenus) fulvicornis</i>		insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Lordithon lunulatus</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Stenus (Hemistenus) impressus</i>		insect - beetle (Coleoptera)	31/05/1999	-	1
<i>Mycetoporus punctus</i>		insect - beetle (Coleoptera)	31/12/1985	-	1
<i>Othius punctulatus</i>		insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Othius subuliformis</i>		insect - beetle (Coleoptera)	16/09/2003	-	1
<i>Proteinus brachypterus</i>		insect - beetle (Coleoptera)	16/09/2003	-	1
<i>Quedius (Microsaurus) cruentus</i>		insect - beetle (Coleoptera)	31/12/1979	-	1
<i>Quedius (Raphirus) nigriceps</i>		insect - beetle (Coleoptera)	17/08/2007	-	1
<i>Reichenbachia junctorum</i>		insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Scaphidium quadrimaculatum</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Scaphisoma boleti</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Sepedophilus bipunctatus</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Sepedophilus testaceus</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Loricera pilicornis</i>		insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Lesteva longolytrata</i>		insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Chaetocnema confusa</i>		insect - beetle (Coleoptera)	03/05/1997	-	2
<i>Rhagonycha fulva</i>	Common Red Soldier Beetle	insect - beetle (Coleoptera)	31/12/1985	17/08/2007	5
<i>Stenolophus mixtus</i>		insect - beetle (Coleoptera)	31/05/1996	09/05/1999	4
<i>Stenolophus teutonius</i>		insect - beetle (Coleoptera)	31/12/1983	30/05/1996	3
<i>Clytus arietis</i>	Wasp Beetle	insect - beetle (Coleoptera)	31/12/1988	-	1
<i>Leptura aurulenta</i>		insect - beetle (Coleoptera)	31/12/1985	16/07/2014	3
<i>Leptura quadrifasciata</i>		insect - beetle (Coleoptera)	07/09/2003	13/06/2007	2
<i>Obrium brunneum</i>		insect - beetle (Coleoptera)	10/05/2011	-	1
<i>Rhagium (Hagrium) bifasciatum</i>		insect - beetle (Coleoptera)	31/08/1982	31/12/1985	2
<i>Rhagium (Megarhagium) mordax</i>		insect - beetle (Coleoptera)	31/12/1985	31/12/1989	2
<i>Rutpela maculata</i>		insect - beetle (Coleoptera)	31/12/1985	30/07/2014	9
<i>Stenurella melanura</i>		insect - beetle (Coleoptera)	31/12/1985	13/06/2007	3
<i>Aphthona euphorbiae</i>	Large Flax Flea Beetle	insect - beetle (Coleoptera)	31/05/1996	03/05/1997	2
<i>Sitona (Sitona) striatellus</i>		insect - beetle (Coleoptera)	07/09/2003	-	1
<i>Cassida rubiginosa</i>	Thistle Tortoise Beetle	insect - beetle (Coleoptera)	07/09/2003	-	1
<i>Acupalpus dubius</i>		insect - beetle (Coleoptera)	31/05/1996	31/05/1999	5
<i>Chrysomela populi</i>	Red Poplar Leaf Beetle	insect - beetle (Coleoptera)	07/09/2003	13/06/2007	2

Latin Name	Common Name	Taxon Group	First Date	Last Date	No. of Rec's
<i>Crepidodera aurea</i>		insect - beetle (Coleoptera)	07/09/2003	-	1
<i>Cryptocephalus biguttatus</i>		insect - beetle (Coleoptera)	07/09/2003	-	1
<i>Cryptocephalus labiatus</i>		insect - beetle (Coleoptera)	07/09/2003	31/07/2012	5
<i>Cryptocephalus parvulus</i>		insect - beetle (Coleoptera)	07/09/2003	17/08/2007	6
<i>Gastrophysa polygoni</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Gastrophysa viridula</i>	Green Dock Beetle	insect - beetle (Coleoptera)	29/06/2004	-	1
<i>Gonioctena viminalis</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Lochmaea caprea</i>	Willow Leaf Beetle	insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Lochmaea suturalis</i>	Heather Beetle	insect - beetle (Coleoptera)	07/09/2003	31/05/2012	3
<i>Strophosoma melanogrammum</i>	Nut Leaf Weevil	insect - beetle (Coleoptera)	09/05/1999	28/05/2012	6
<i>Longitarsus parvulus</i>	Flax Flea Beetle	insect - beetle (Coleoptera)	03/05/1997	-	2
<i>Apteropeda orbiculata</i>		insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Carabus (Archicarabus) nemoralis</i>		insect - beetle (Coleoptera)	31/12/1985	-	1
<i>Nebria (Nebria) salina</i>		insect - beetle (Coleoptera)	25/10/2012	17/05/2013	2
<i>Notiophilus palustris</i>		insect - beetle (Coleoptera)	05/06/2013	-	1
<i>Paradromius linearis</i>		insect - beetle (Coleoptera)	31/12/1993	-	2
<i>Harpalus (Harpalus) rufipalpis</i>		insect - beetle (Coleoptera)	07/09/2003	28/05/2012	2
<i>Harpalus (Harpalus) rubripes</i>		insect - beetle (Coleoptera)	07/09/2003	-	1
<i>Dyschirius (Dyschiriodes) globosus</i>		insect - beetle (Coleoptera)	03/05/1997	-	1
<i>Cychnus caraboides</i>	Snail Hunter	insect - beetle (Coleoptera)	31/12/1985	-	1
<i>Cicindela campestris</i>	Green Tiger Beetle	insect - beetle (Coleoptera)	31/12/1985	05/06/2013	13
<i>Platynus assimilis</i>		insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Poecilus cupreus</i>		insect - beetle (Coleoptera)	31/12/1973	-	1
<i>Pterostichus (Argutor) diligens</i>		insect - beetle (Coleoptera)	03/05/1997	-	1
<i>Pterostichus (Argutor) strenuus</i>		insect - beetle (Coleoptera)	31/05/1996	20/05/1998	2
<i>Rhagonycha lignosa</i>		insect - beetle (Coleoptera)	09/05/1999	05/06/2013	4
<i>Carabus (Carabus) granulatus</i>		insect - beetle (Coleoptera)	31/12/1985	-	1
<i>Rhagonycha limbata</i>		insect - beetle (Coleoptera)	28/05/2012	-	1
<i>Bembidion (Philochthus) mannerheimii</i>		insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Bembidion (Ocydromus) tetracolum</i>		insect - beetle (Coleoptera)	31/05/1996	20/05/1998	2
<i>Bembidion (Notaphus) obliquum</i>		insect - beetle (Coleoptera)	31/12/1986	-	1
<i>Bembidion (Metallina) properans</i>		insect - beetle (Coleoptera)	31/05/1996	03/05/1997	2
<i>Bembidion (Metallina) lampros</i>		insect - beetle (Coleoptera)	31/05/1996	20/05/1998	2
<i>Badister (Badister) bullatus</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Asaphidion curtum</i>		insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Anisodactylus binotatus</i>		insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Agonum (Europhilus) gracile</i>		insect - beetle (Coleoptera)	03/05/1997	-	1
<i>Agonum (Agonum) sexpunctatum</i>		insect - beetle (Coleoptera)	31/12/1989	05/06/2014	6
<i>Agonum (Agonum) muelleri</i>		insect - beetle (Coleoptera)	31/12/1989	31/05/1996	2
<i>Acupalpus parvulus</i>		insect - beetle (Coleoptera)	03/05/1997	09/05/1999	3
<i>Longitarsus tabidus</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Pterostichus (Steropus) madidus</i>	Rain-Clock	insect - beetle (Coleoptera)	07/09/2003	-	1
<i>Nedyus quadrimaculatus</i>	Small Nettle Weevil	insect - beetle (Coleoptera)	07/09/2003	-	1
<i>Longitarsus flavicornis</i>		insect - beetle (Coleoptera)	31/05/1996	-	1

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<i>Bagous (Bagous) lutilus</i>		insect - beetle (Coleoptera)	31/12/1985	20/05/1998	3
<i>Barypeithes (Exomias) pellucidus</i>	Hairy Spider Weevil	insect - beetle (Coleoptera)	31/12/1989	31/05/1996	2
<i>Caenopsis waltoni</i>		insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Ceutorhynchus erysimi</i>		insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Ceutorhynchus typhae</i>		insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Cionus alauda</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Cionus hortulanus</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Cleopus pulchellus</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Coeliodinus rubicundus</i>		insect - beetle (Coleoptera)	31/12/1989	07/09/2003	3
<i>Curculio rubidus</i>		insect - beetle (Coleoptera)	17/08/2007	-	1
<i>Euophryum confine</i>	Wood-Boring Weevil	insect - beetle (Coleoptera)	31/05/1996	31/05/1999	2
<i>Archarius pyrrhoceras</i>		insect - beetle (Coleoptera)	07/09/2003	-	1
<i>Micrelus ericae</i>	Small Heather Weevil	insect - beetle (Coleoptera)	03/05/1997	-	2
<i>Anoplus plantaris</i>		insect - beetle (Coleoptera)	31/12/1989	31/05/2012	4
<i>Neliocarus nebulosus</i>		insect - beetle (Coleoptera)	24/08/1986	31/05/1996	3
<i>Neliocarus sus</i>	Heather Weevil	insect - beetle (Coleoptera)	09/05/1999	31/05/2012	5
<i>Orchestes (Orchestes) rusci</i>		insect - beetle (Coleoptera)	07/09/2003	-	1
<i>Pelenomus olssoni</i>		insect - beetle (Coleoptera)	31/12/1985	16/07/1996	6
<i>Phyllobius (Phyllobius) pyri</i>	Common Leaf Weevil	insect - beetle (Coleoptera)	03/05/1997	13/06/2007	4
<i>Polydrusus (Neoeustolus) cervinus</i>		insect - beetle (Coleoptera)	31/12/1989	31/05/2012	7
<i>Polydrusus (Neoeustolus) pilosus</i>		insect - beetle (Coleoptera)	28/05/2012	-	1
<i>Polydrusus (Polydrusus) tereticollis</i>		insect - beetle (Coleoptera)	07/09/2003	-	1
<i>Rhamphus pulicarius</i>		insect - beetle (Coleoptera)	07/09/2003	-	1
<i>Sitona (Sitona) cambricus</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Sitona (Sitona) humeralis</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Sitona (Sitona) lineatus</i>	Pea-leaf Weevil	insect - beetle (Coleoptera)	03/05/1997	17/08/2007	2
<i>Hypera (Hypera) venusta</i>		insect - beetle (Coleoptera)	13/06/2007	-	1
<i>Calvia quattuordecimguttata</i>	Cream-spot Ladybird	insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Neocrepidodera transversa</i>		insect - beetle (Coleoptera)	07/09/2003	17/08/2007	2
<i>Phaedon armoraciae</i>	Mustard Beetle	insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Phratora laticollis</i>		insect - beetle (Coleoptera)	07/09/2003	-	1
<i>Phyllotreta nigripes</i>	Turnip Flea Beetle	insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Timarcha goettingensis</i>	Small Bloody-nosed Beetle	insect - beetle (Coleoptera)	31/12/1985	07/09/2003	3
<i>Podabrus alpinus</i>		insect - beetle (Coleoptera)	31/12/1985	-	1
<i>Malthinus flaveolus</i>		insect - beetle (Coleoptera)	07/09/2003	-	1
<i>Cantharis rustica</i>		insect - beetle (Coleoptera)	31/12/1985	31/12/1989	2
<i>Cis nitidus</i>		insect - beetle (Coleoptera)	16/09/2003	-	1
<i>Ennearthron cornutum</i>		insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Adalia bipunctata</i>	2-spot Ladybird	insect - beetle (Coleoptera)	31/12/1988	07/09/2003	2
<i>Archarius salicivorus</i>	Willow Gall Weevil	insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Anatis ocellata</i>	Eyed Ladybird	insect - beetle (Coleoptera)	31/12/1985	09/05/1999	3
<i>Luperus longicornis</i>		insect - beetle (Coleoptera)	07/09/2003	13/06/2007	4
<i>Psyllobora vigintiduopunctata</i>	22-spot Ladybird	insect - beetle (Coleoptera)	31/12/1985	-	1
<i>Amalus scortillum</i>		insect - beetle (Coleoptera)	31/12/1989	-	1

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<i>Atomaria (Atomaria) nigrirostris</i>		insect - beetle (Coleoptera)	31/05/1996	-	1
<i>Atomaria (Atomaria) linearis</i>	Pygmy Mangel Beetle	insect - beetle (Coleoptera)	31/12/1989	-	1
<i>Tytthaspis sedecimpunctata</i>	16-spot Ladybird	insect - beetle (Coleoptera)	31/12/1989	07/09/2003	4
<i>Adalia decempunctata</i>	10-spot Ladybird	insect - beetle (Coleoptera)	31/12/1985	-	1
<i>Scymnus</i>		insect - beetle (Coleoptera)	03/05/1997	-	1
<i>Chilocorus bipustulatus</i>	Heather Ladybird	insect - beetle (Coleoptera)	13/06/2007	-	1
<i>Propylea quattuordecimpunctata</i>	14-spot Ladybird	insect - beetle (Coleoptera)	16/06/1985	13/06/2007	4
<i>Myzia oblongoguttata</i>	Striped Ladybird	insect - beetle (Coleoptera)	07/09/2003	-	1
<i>Harmonia axyridis</i>	Harlequin Ladybird	insect - beetle (Coleoptera)	13/06/2007	17/08/2007	3
<i>Halyzia sedecimguttata</i>	Orange Ladybird	insect - beetle (Coleoptera)	31/12/1985	-	1
<i>Coccinella septempunctata</i>	7-spot Ladybird	insect - beetle (Coleoptera)	16/06/1985	31/05/2012	10
<i>Coccinella hieroglyphica</i>	Hieroglyphic Ladybird	insect - beetle (Coleoptera)	31/12/1985	-	1
<i>Scymnus (Scymnus) schmidti</i>		insect - beetle (Coleoptera)	03/05/1997	-	1
<i>Panorpa communis</i>		insect - scorpion fly (Mecoptera)	16/06/1985	-	1
<i>Lasiommata megera</i>	Wall	insect - butterfly	31/07/1985	31/12/1988	2
<i>Vanessa atalanta</i>	Red Admiral	insect - butterfly	31/07/1985	16/07/2014	11
<i>Limenitis camilla</i>	White Admiral	insect - butterfly	31/07/1985	10/07/2004	3
<i>Maniola jurtina</i>	Meadow Brown	insect - butterfly	31/07/1985	18/06/2012	13
<i>Melanargia galathea</i>	Marbled White	insect - butterfly	06/07/2003	-	1
<i>Pararge aegeria</i>	Speckled Wood	insect - butterfly	31/07/1985	28/08/2012	4
<i>Polygonia c-album</i>	Comma	insect - butterfly	31/07/1985	02/10/2013	7
<i>Inachis io</i>	Peacock	insect - butterfly	31/07/1985	16/05/2012	7
<i>Pyronia tithonus subsp. britanniae</i>	Hedge Brown	insect - butterfly	31/07/1985	31/12/2002	3
<i>Gonepteryx rhamni</i>	Brimstone	insect - butterfly	31/07/1985	11/03/2012	5
<i>Vanessa cardui</i>	Painted Lady	insect - butterfly	16/06/1985	02/04/2012	9
<i>Anthocharis cardamines</i>	Orange-tip	insect - butterfly	31/07/1985	01/05/2012	3
<i>Pieris brassicae</i>	Large White	insect - butterfly	16/06/1985	15/07/2012	5
<i>Pieris rapae</i>	Small White	insect - butterfly	31/07/1985	23/03/2012	4
<i>Hipparchia semele</i>	Grayling	insect - butterfly	31/07/1985	-	1
<i>Ochlodes</i>		insect - butterfly	07/09/2003	-	1
<i>Pyronia tithonus</i>	Hedge Brown	insect - butterfly	14/07/1995	15/07/2012	8
<i>Celastrina argiolus</i>	Holly Blue	insect - butterfly	14/08/1996	05/04/2012	2
<i>Thymelicus sylvestris</i>	Small Skipper	insect - butterfly	31/07/1985	24/06/2006	3
<i>Ochlodes sylvanus</i>	Large Skipper	insect - butterfly	31/07/1985	06/07/2010	9
<i>Pieris napi</i>	Green-veined White	insect - butterfly	31/07/1985	31/12/1988	2
<i>Coenonympha pamphilus</i>	Small Heath	insect - butterfly	31/07/1985	31/12/1988	2
<i>Callophrys rubi</i>	Green Hairstreak	insect - butterfly	31/12/1988	-	1
<i>Celastrina argiolus subsp. britanna</i>	Holly Blue	insect - butterfly	31/07/1985	-	1
<i>Favonius quercus</i>	Purple Hairstreak	insect - butterfly	31/07/1985	31/12/1988	2
<i>Lycaena phlaeas</i>	Small Copper	insect - butterfly	31/07/1985	02/10/2013	4
<i>Plebejus argus subsp. cretaceus</i>	Silver-studded Blue	insect - butterfly	31/12/1988	-	1
<i>Polyommatus icarus</i>	Common Blue	insect - butterfly	31/07/1985	13/06/2012	6
<i>Argynnis paphia</i>	Silver-washed Fritillary	insect - butterfly	31/07/1985	22/07/2014	5
<i>Aglais urticae</i>	Small Tortoiseshell	insect - butterfly	31/07/1985	06/03/2014	8

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<i>Argynnis aglaja</i>	Dark Green Fritillary	insect - butterfly	31/12/1984	-	1
<i>Plebejus argus</i>	Silver-studded Blue	insect - butterfly	31/07/1985	29/06/2013	82
<i>Aphantopus hyperantus</i>	Ringlet	insect - butterfly	31/07/1985	01/07/2012	4
<i>Apatura iris</i>	Purple Emperor	insect - butterfly	10/07/2004	02/07/2009	2
<i>Euproctis similis</i>	Yellow-tail	insect - moth	31/07/1985	15/08/2007	17
<i>Elachista argentella</i>	Swan-feather Dwarf	insect - moth	16/06/2007	-	1
<i>Calliteara pudibunda</i>	Pale Tussock	insect - moth	08/09/1985	10/06/2014	21
<i>Catocala nupta</i>	Red Underwing	insect - moth	24/12/2006	-	1
<i>Hypena crassalis</i>	Beautiful Snout	insect - moth	31/12/1995	15/08/2007	12
<i>Euproctis chrysorrhoea</i>	Brown-tail	insect - moth	12/07/2005	13/07/2007	4
<i>Herminia grisealis</i>	Small Fan-foot	insect - moth	31/12/1995	08/06/2007	4
<i>Agonopterix umbellana</i>	Gorse Flat-body	insect - moth	31/12/1995	-	1
<i>Falcaria lacertinaria</i>	Scalloped Hook-tip	insect - moth	31/12/1995	28/09/2013	24
<i>Hypena proboscidalis</i>	Snout	insect - moth	31/12/1995	21/09/2007	10
<i>Euclidia glyphica</i>	Burnet Companion	insect - moth	31/07/1985	-	1
<i>Watsonalla binaria</i>	Oak Hook-tip	insect - moth	31/12/1995	21/09/2007	12
<i>Thyatira batis</i>	Peach Blossom	insect - moth	31/12/1995	12/09/2007	10
<i>Tetheella fluctuosa</i>	Satin Lutestring	insect - moth	31/12/1995	13/07/2007	17
<i>Tethea ocularis subsp. octogesimea</i>	Figure of Eighty	insect - moth	31/12/1995	-	1
<i>Tethea ocularis</i>	Figure of Eighty	insect - moth	06/06/2004	08/06/2007	5
<i>Polyplocia ridens</i>	Frosted Green	insect - moth	24/04/2004	21/09/2007	10
<i>Habrosyne pyritoides</i>	Buff Arches	insect - moth	31/12/1995	18/07/2007	13
<i>Drepana falcataria subsp. falcataria</i>	Pebble Hook-tip	insect - moth	16/06/2003	-	1
<i>Drepana falcataria</i>	Pebble Hook-tip	insect - moth	31/12/1995	10/06/2014	38
<i>Cymatophorima diluta</i>	Oak Lutestring	insect - moth	12/09/2007	-	1
<i>Cilix glaucata</i>	Chinese Character	insect - moth	24/12/2006	08/06/2007	2
<i>Laspeyria flexula</i>	Beautiful Hook-tip	insect - moth	31/12/1995	13/07/2007	15
<i>Agriopis marginaria</i>	Dotted Border	insect - moth	24/12/2006	26/11/2007	5
<i>Ochropacha duplaris</i>	Common Lutestring	insect - moth	31/12/1995	05/06/2007	3
<i>Acasis viretata</i>	Yellow-barred Brindle	insect - moth	31/12/1995	31/07/2004	2
<i>Aplocera efformata</i>	Lesser Treble-bar	insect - moth	24/12/2006	-	1
<i>Aplocera</i>		insect - moth	16/08/2003	-	1
<i>Apeira syringaria</i>	Lilac Beauty	insect - moth	24/12/2006	-	1
<i>Anticlea derivata</i>	Streamer	insect - moth	13/04/2007	-	1
<i>Anticlea badiata</i>	Shoulder Stripe	insect - moth	31/12/1995	10/03/2007	2
<i>Angerona prunaria</i>	Orange Moth	insect - moth	31/12/1995	-	1
<i>Alsophila aescularia</i>	March Moth	insect - moth	24/04/2004	22/04/2007	8
<i>Alcis repandata subsp. repandata</i>	Mottled Beauty	insect - moth	16/06/2003	06/09/2007	12
<i>Alcis repandata</i>	Mottled Beauty	insect - moth	31/12/1995	10/06/2014	10
<i>Crambus hamella</i>	Dark Grass-veneer	insect - moth	31/12/1995	31/08/2005	7
<i>Agriopis leucophaearia</i>	Spring Usher	insect - moth	16/02/2007	-	1
<i>Agriopis aurantiaria</i>	Scarce Umber	insect - moth	24/12/2006	-	1
<i>Aethalura punctulata</i>	Grey Birch	insect - moth	31/12/1995	07/05/2007	11
<i>Lymantria monacha</i>	Black Arches	insect - moth	31/12/1995	13/09/2007	21

Latin Name	Common Name	Taxon Group	First Date	Last Date	No. of Rec's
<i>Neofaculta ericetella</i>	Heather Groundling	insect - moth	13/06/2007	-	1
<i>Aristotelia ericinella</i>	Heather Neb	insect - moth	13/06/2007	17/08/2007	3
<i>Anacampsis blattariella</i>	Birch Sober	insect - moth	16/06/2007	-	1
<i>Eriocrania sparmannella</i>	Mottled Purple	insect - moth	31/12/1975	31/12/1995	2
<i>Zanclognatha tarsipennalis</i>	Fan-foot	insect - moth	31/12/1995	10/06/2014	8
<i>Schrankia costaestrigalis</i>	Pinion-streaked Snout	insect - moth	24/12/2006	10/06/2014	3
<i>Rivula sericealis</i>	Straw Dot	insect - moth	31/12/1995	25/06/2013	18
<i>Phytometra viridaria</i>	Small Purple-barred	insect - moth	31/12/1995	13/07/2003	2
<i>Parascotia fuliginaria</i>	Waved Black	insect - moth	31/12/1995	31/07/2004	2
<i>Paracolax tristalis</i>	Clay Fan-foot	insect - moth	31/07/2004	24/12/2006	2
<i>Orgyia antiqua</i>	Vapourer	insect - moth	31/07/1985	31/12/1995	2
<i>Achlya flavicornis</i>	Yellow Horned	insect - moth	31/12/1995	09/04/2007	9
<i>Eilema lurideola</i>	Common Footman	insect - moth	31/12/1995	25/08/2007	14
<i>Crambus perlella</i>	Satin Grass-veneer	insect - moth	31/12/1995	09/08/2005	2
<i>Coleophora pyrrhulipennella</i>	Ling Case-bearer	insect - moth	31/05/2012	25/06/2013	2
<i>Coleophora betulella</i>	White Birch Case-bearer	insect - moth	08/10/2011	-	1
<i>Blastobasis lacticolella</i>	Wakely's Dowd	insect - moth	16/06/2007	25/06/2013	2
<i>Blastobasis adustella</i>	Dingy Dowd	insect - moth	16/08/2003	31/07/2004	4
<i>Tyria jacobaeae</i>	Cinnabar	insect - moth	16/06/1985	10/06/2014	11
<i>Spilosoma luteum</i>	Buff Ermine	insect - moth	31/08/1982	10/06/2014	17
<i>Spilosoma lubricipeda</i>	White Ermine	insect - moth	31/12/1995	08/06/2007	13
<i>Phragmatobia fuliginosa subsp. fuliginosa</i>	Ruby Tiger	insect - moth	13/07/2007	06/09/2007	3
<i>Phragmatobia fuliginosa</i>	Ruby Tiger	insect - moth	31/07/1985	22/07/2014	10
<i>Acentria ephemerella</i>	Water Veneer	insect - moth	31/12/1995	31/07/2004	5
<i>Eilema sororcula</i>	Orange Footman	insect - moth	15/05/2004	10/06/2014	16
<i>Agriphila geniculea</i>	Elbow-stripe Grass-veneer	insect - moth	31/12/1995	31/08/2005	6
<i>Eilema griseola</i>	Dingy Footman	insect - moth	31/12/1995	06/09/2007	16
<i>Eilema depressa</i>	Buff Footman	insect - moth	31/12/1995	15/08/2007	13
<i>Eilema complana</i>	Scarce Footman	insect - moth	31/12/1995	15/08/2007	23
<i>Diaphora mendica</i>	Muslin Moth	insect - moth	24/12/2006	14/05/2007	6
<i>Diacrisia sannio</i>	Clouded Buff	insect - moth	31/12/1995	10/06/2014	7
<i>Cybosia mesomella</i>	Four-dotted Footman	insect - moth	31/12/1995	10/06/2014	6
<i>Atolmis rubricollis</i>	Red-necked Footman	insect - moth	24/12/2006	16/06/2007	5
<i>Arctia caja</i>	Garden Tiger	insect - moth	31/12/1995	-	1
<i>Alucita hexadactyla</i>	Twenty-plume Moth	insect - moth	31/07/2004	-	2
<i>Xanthia togata</i>	Pink-barred Sallow	insect - moth	31/07/1985	12/10/2007	8
<i>Aplocera plagiata</i>	Treble-bar	insect - moth	10/07/2007	06/08/2007	3
<i>Miltochrista miniata</i>	Rosy Footman	insect - moth	31/12/1995	06/09/2007	26
<i>Elophila nymphaeata</i>	Brown China-mark	insect - moth	12/07/2005	-	1
<i>Udea ferrugalis</i>	Rusty Dot	insect - moth	16/08/2003	-	2
<i>Scoparia subfusca</i>	Large Grey	insect - moth	16/08/2003	30/08/2004	4
<i>Scoparia pyralella</i>	Meadow Grey	insect - moth	15/06/2004	-	1
<i>Scoparia ambigualis</i>	Common Grey	insect - moth	31/12/1995	10/06/2014	5
<i>Pleuroptya ruralis</i>	Mother of Pearl	insect - moth	31/12/1995	12/07/2005	8

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<i>Perinephela lancealis</i>	Long-winged Pearl	insect - moth	31/12/1995	10/06/2007	2
<i>Nomophila noctuella</i>	Rush Veneer	insect - moth	16/06/2003	19/08/2006	8
<i>Eurrhynx hortulata</i>	Small Magpie	insect - moth	31/12/1995	10/06/2007	3
<i>Eudonia truncicolella</i>	Ground-moss Grey	insect - moth	31/12/1995	-	1
<i>Eudonia pallida</i>	Marsh Grey	insect - moth	10/06/2014	-	1
<i>Zeuzera pyrina</i>	Leopard Moth	insect - moth	31/12/1995	13/07/2007	4
<i>Eudonia lacustrata</i>	Little Grey	insect - moth	31/07/2004	-	4
<i>Udea prunalis</i>	Dusky Pearl	insect - moth	31/07/2004	-	2
<i>Crambus uliginosellus</i>	Marsh Grass-veneer	insect - moth	31/12/1995	-	2
<i>Crambus pascuella</i>	Inlaid Grass-veneer	insect - moth	31/12/1995	05/07/2003	3
<i>Chrysoteuchia culmella</i>	Garden Grass-veneer	insect - moth	31/12/1995	11/07/2007	11
<i>Catoptria pinella</i>	Pearl Grass-veneer	insect - moth	31/12/1995	20/08/2005	7
<i>Catoptria falsella</i>	Chequered Grass-veneer	insect - moth	31/12/1995	-	1
<i>Anania verbascalis</i>	Golden Pearl	insect - moth	31/07/2004	16/06/2007	3
<i>Agriphila tristella</i>	Common Grass-veneer	insect - moth	31/12/1995	31/08/2005	14
<i>Agriphila straminella</i>	Straw Grass-veneer	insect - moth	31/12/1995	-	1
<i>Agriphila selasella</i>	Pale-streak Grass-veneer	insect - moth	31/12/1995	31/07/2004	3
<i>Agriphila latistria</i>	White-streak Grass-veneer	insect - moth	31/12/1995	20/08/2005	4
<i>Agriphila inquinatella</i>	Barred Grass-veneer	insect - moth	31/12/1995	12/07/2005	4
<i>Eudonia mercurella</i>	Small Grey	insect - moth	13/07/2003	16/06/2007	8
<i>Conistra vaccinii</i>	Chestnut	insect - moth	31/12/1995	24/10/2012	19
<i>Caradrina morpheus</i>	Mottled Rustic	insect - moth	31/12/1995	13/07/2007	3
<i>Cerastis rubricosa</i>	Red Chestnut	insect - moth	31/12/1995	28/04/2007	11
<i>Charanyca trigrammica</i>	Treble Lines	insect - moth	31/12/1995	10/06/2007	16
<i>Chilodes maritimus</i>	Silky Wainscot	insect - moth	18/07/2007	-	1
<i>Coenobia rufa</i>	Small Rufous	insect - moth	31/12/1995	09/08/2005	4
<i>Colocasia coryli</i>	Nut-tree Tussock	insect - moth	31/12/1995	02/09/2007	29
<i>Anarta myrtilli</i>	Beautiful Yellow Underwing	insect - moth	31/07/1985	24/10/2012	20
<i>Conistra rubiginosa</i>	Dotted Chestnut	insect - moth	31/12/1995	02/04/2007	4
<i>Axylia putris</i>	Flame	insect - moth	31/12/1995	16/06/2007	8
<i>Cosmia trapezina</i>	Dun-bar	insect - moth	31/12/1995	02/09/2007	9
<i>Craniophora ligustri</i>	Coronet	insect - moth	15/06/2004	06/09/2007	8
<i>Diachrysis chrysitis</i>	Burnished Brass	insect - moth	31/12/1995	21/09/2007	13
<i>Diarsia mendica</i>	Ingrailed Clay	insect - moth	06/06/2004	10/06/2014	3
<i>Diarsia mendica subsp. mendica</i>	Ingrailed Clay	insect - moth	31/12/1995	17/05/2007	3
<i>Diarsia rubi</i>	Small Square-spot	insect - moth	31/12/1995	12/09/2007	6
<i>Dichonia aprilina</i>	Merveille Du Jour	insect - moth	24/12/2006	02/11/2007	7
<i>Conistra ligula</i>	Dark Chestnut	insect - moth	24/12/2006	09/04/2007	4
<i>Apamea unanimitis</i>	Small Clouded Brindle	insect - moth	10/06/2014	-	1
<i>Parectropis similaria</i>	Brindled White-spot	insect - moth	31/12/1995	14/06/2007	2
<i>Apamea epomidion</i>	Clouded Brindle	insect - moth	10/06/2014	-	1
<i>Apamea lithoxyloa</i>	Light Arches	insect - moth	13/07/2003	15/06/2004	2
<i>Apamea monoglypha</i>	Dark Arches	insect - moth	31/12/1995	10/06/2014	22
<i>Apamea ophiogramma</i>	Double Lobed	insect - moth	24/12/2006	18/07/2007	2

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<i>Apamea remissa</i>	Dusky Brocade	insect - moth	24/12/2006	02/09/2007	2
<i>Apamea scolopacina</i>	Slender Brindle	insect - moth	31/12/1995	13/07/2007	5
<i>Callistege mi</i>	Mother Shipton	insect - moth	24/12/2006	-	1
<i>Apamea sublustris</i>	Reddish Light Arches	insect - moth	10/06/2014	-	1
<i>Brachylomia viminalis</i>	Minor Shoulder-knot	insect - moth	31/12/1995	-	1
<i>Aporophyla nigra</i>	Black Rustic	insect - moth	21/09/2005	02/11/2007	7
<i>Archanara geminipuncta</i>	Twin-spotted Wainscot	insect - moth	31/12/1995	-	1
<i>Asteroscopus sphinx</i>	Sprawler	insect - moth	24/12/2006	26/11/2007	5
<i>Atethmia centrago</i>	Centre-barred Sallow	insect - moth	31/12/1995	21/09/2007	4
<i>Autographa gamma</i>	Silver Y	insect - moth	31/07/1985	20/08/2012	21
<i>Autographa pulchrina</i>	Beautiful Golden Y	insect - moth	31/12/1995	14/06/2007	3
<i>Dryobotodes eremita</i>	Brindled Green	insect - moth	21/09/2005	21/09/2007	4
<i>Apamea sordens</i>	Rustic Shoulder-knot	insect - moth	31/12/1995	-	1
<i>Lithophane ornitopus subsp. lactipennis</i>	Grey Shoulder-knot	insect - moth	31/12/1995	-	1
<i>Diloba caeruleocephala</i>	Figure of Eight	insect - moth	26/10/2007	-	1
<i>Lacanobia contigua</i>	Beautiful Brocade	insect - moth	24/12/2006	-	1
<i>Lacanobia oleracea</i>	Bright-Line Brown-Eye	insect - moth	31/12/1995	25/06/2013	9
<i>Lacanobia thalassina</i>	Pale-shouldered Brocade	insect - moth	31/12/1995	24/05/2007	2
<i>Lacanobia w-latinum</i>	Light Brocade	insect - moth	31/12/1995	10/06/2014	20
<i>Lithophane hepatica</i>	Pale Pinion	insect - moth	09/04/2007	-	1
<i>Lithophane leautieri</i>	Blair's Shoulder-knot	insect - moth	24/12/2006	-	1
<i>Ipimorpha retusa</i>	Double Kidney	insect - moth	31/12/1995	-	1
<i>Lithophane ornitopus</i>	Grey Shoulder-knot	insect - moth	24/12/2006	16/03/2007	3
<i>Hydraecia micacea</i>	Rosy Rustic	insect - moth	21/09/2007	-	1
<i>Luperina testacea</i>	Flounced Rustic	insect - moth	31/12/1995	27/09/2007	12
<i>Lycophotia porphyrea</i>	True Lover's Knot	insect - moth	31/07/1985	10/06/2014	43
<i>Mamestra brassicae</i>	Cabbage Moth	insect - moth	31/12/1995	24/12/2006	2
<i>Melanchra persicariae</i>	Dot Moth	insect - moth	31/12/1995	13/07/2007	3
<i>Melanchra pisi</i>	Broom Moth	insect - moth	31/12/1995	08/06/2007	7
<i>Mesapamea</i>		insect - moth	31/07/2004	-	1
<i>Mesapamea secalis agg.</i>	Common Rustic	insect - moth	16/08/2003	-	1
<i>Lithophane leautieri subsp. hesperica</i>	Blair's Shoulder-knot	insect - moth	10/10/2007	-	1
<i>Hada plebeja</i>	Shears	insect - moth	31/12/1995	08/06/2007	13
<i>Anaplectoides prasina</i>	Green Arches	insect - moth	31/12/1995	-	1
<i>Dypterygia scabriuscula</i>	Bird's Wing	insect - moth	06/06/2004	-	1
<i>Elaphria venustula</i>	Rosy Marbled	insect - moth	31/12/1995	10/06/2014	5
<i>Eugnorisma glareosa</i>	Autumnal Rustic	insect - moth	15/09/2004	21/09/2007	4
<i>Euplexia lucipara</i>	Small Angle Shades	insect - moth	31/12/1995	10/06/2014	11
<i>Eupsilia transversa</i>	Satellite	insect - moth	24/12/2006	02/11/2007	8
<i>Eurois occulta</i>	Great Brocade	insect - moth	24/12/2006	-	1
<i>Ipimorpha subtusa</i>	Olive	insect - moth	31/12/1995	-	1
<i>Gortyna flavago</i>	Frosted Orange	insect - moth	24/12/2006	-	1
<i>Discestra trifolii</i>	Nutmeg	insect - moth	31/12/1995	-	1
<i>Hadena bicurris</i>	Lychnis	insect - moth	31/12/1995	-	1

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<i>Hecatera bicolorata</i>	Broad-barred White	insect - moth	10/07/2007	-	1
<i>Helicoverpa armigera</i>	Scarce Bordered Straw	insect - moth	24/12/2006	-	1
<i>Heliothis peltigera</i>	Bordered Straw	insect - moth	24/12/2006	-	1
<i>Hoplodrina alsines</i>	Uncertain	insect - moth	31/12/1995	18/07/2007	10
<i>Hoplodrina ambigua</i>	Vine's Rustic	insect - moth	16/08/2003	21/09/2007	4
<i>Hoplodrina blanda</i>	Rustic	insect - moth	31/12/1995	06/09/2007	13
<i>Euxoa tritici</i>	White-line Dart	insect - moth	31/12/1995	12/09/2007	12
<i>Xanthorhoe biriviata</i>	Balsam Carpet	insect - moth	31/07/2004	-	1
<i>Selenia dentaria</i>	Early Thorn	insect - moth	31/12/1995	18/07/2007	9
<i>Selenia tetralunaria</i>	Purple Thorn	insect - moth	31/07/2004	06/08/2007	6
<i>Apocheima hispidaria</i>	Small Brindled Beauty	insect - moth	07/03/2007	30/12/2007	4
<i>Thera firmata</i>	Pine Carpet	insect - moth	31/12/1995	26/11/2007	32
<i>Xanthia aurago</i>	Barred Sallow	insect - moth	24/12/2006	24/10/2007	3
<i>Timandra comae</i>	Blood-Vein	insect - moth	15/06/2004	21/09/2007	7
<i>Apamea crenata</i>	Clouded-bordered Brindle	insect - moth	31/12/1995	17/05/2007	2
<i>Trichopteryx carpinata</i>	Early Tooth-striped	insect - moth	31/12/1995	28/04/2007	15
<i>Rhodometra sacraria</i>	Vestal	insect - moth	24/12/2006	-	1
<i>Xanthorhoe designata</i>	Flame Carpet	insect - moth	06/09/2007	-	1
<i>Xanthorhoe ferrugata</i>	Dark-barred Twin-spot Carpet	insect - moth	16/08/2003	-	1
<i>Xanthorhoe fluctuata</i>	Garden Carpet	insect - moth	31/12/1995	13/09/2007	3
<i>Xanthorhoe montanata</i>	Silver-ground Carpet	insect - moth	31/12/1995	15/06/2004	2
<i>Xanthorhoe spadicearia</i>	Red Twin-spot Carpet	insect - moth	31/12/1995	24/12/2006	4
<i>Caloptilia stigmatella</i>	White-triangle Slender	insect - moth	08/10/2011	-	1
<i>Parornix betulae</i>	Brown Birch Slender	insect - moth	08/10/2011	-	1
<i>Timandra griseata</i>	Blood-Vein	insect - moth	31/07/1985	-	1
<i>Philereme transversata</i>	Dark Umber	insect - moth	31/07/2004	-	1
<i>Pasiphila rectangularata</i>	Green Pug	insect - moth	24/12/2006	08/06/2007	2
<i>Perconia</i>		insect - moth	07/06/2005	-	1
<i>Perconia strigillaria</i>	Grass Wave	insect - moth	31/12/1995	10/06/2014	13
<i>Peribatodes rhomboidaria</i>	Willow Beauty	insect - moth	31/12/1995	12/10/2007	19
<i>Perizoma affinitata</i>	Rivulet	insect - moth	31/12/1995	15/05/2007	2
<i>Perizoma alchemillata</i>	Small Rivulet	insect - moth	31/07/2004	24/12/2006	5
<i>Perizoma didymata subsp. didymata</i>	Twin-spot Carpet	insect - moth	24/12/2006	-	1
<i>Scopula imitaria</i>	Small Blood-vein	insect - moth	31/12/1995	24/12/2006	2
<i>Phigalia pilosaria</i>	Pale Brindled Beauty	insect - moth	14/01/2007	25/02/2007	3
<i>Scopula floslactata</i>	Cream Wave	insect - moth	31/12/1995	07/07/2007	6
<i>Plagodis dolabraria</i>	Scorched Wing	insect - moth	31/12/1995	25/06/2013	17
<i>Pseudopanthera macularia</i>	Speckled Yellow	insect - moth	31/07/1985	29/05/2009	3
<i>Pseudoterpna pruinata</i>	Grass Emerald	insect - moth	10/07/2007	-	1
<i>Pseudoterpna pruinata subsp. atropunctaria</i>	Grass Emerald	insect - moth	31/12/1995	-	1
<i>Pterapherapteryx sexualata</i>	Small Seraphim	insect - moth	31/12/1995	16/06/2007	13
<i>Rheumaptera undulata</i>	Scallop Shell	insect - moth	31/12/1995	24/12/2006	3
<i>Phyllonorycter rajella</i>	Common Alder Midget	insect - moth	08/10/2011	-	1
<i>Petrophora chlorosata</i>	Brown Silver-line	insect - moth	31/12/1995	10/06/2014	29

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<i>Agrotis exclamationis</i>	Heart & Dart	insect - moth	31/12/1995	06/08/2007	22
<i>Phyllocnistis saligna</i>	Willow Bent-wing	insect - moth	08/10/2011	-	1
<i>Acronicta megacephala</i>	Poplar Grey	insect - moth	31/12/1995	13/07/2007	9
<i>Acronicta psi</i>	Grey Dagger	insect - moth	31/07/2004	-	1
<i>Acronicta rumicis</i>	Knot Grass	insect - moth	31/12/1995	28/09/2013	8
<i>Agrochola circellaris</i>	Brick	insect - moth	31/08/2005	02/11/2007	6
<i>Agrochola haematidea</i>	Southern Chestnut	insect - moth	10/10/2007	12/10/2007	2
<i>Agrochola lota</i>	Red-line Quaker	insect - moth	24/12/2006	24/10/2012	5
<i>Acronicta alni</i>	Alder Moth	insect - moth	31/12/1995	08/06/2007	7
<i>Agrotis clavis</i>	Heart & Club	insect - moth	24/12/2006	10/07/2007	7
<i>Acronicta aceris</i>	Sycamore	insect - moth	31/12/1995	18/07/2007	3
<i>Agrotis ipsilon</i>	Dark Sword-grass	insect - moth	31/12/1995	24/12/2006	5
<i>Agrotis puta</i>	Shuttle-shaped Dart	insect - moth	31/12/1995	15/08/2007	18
<i>Agrotis segetum</i>	Turnip Moth	insect - moth	31/12/1995	12/09/2007	7
<i>Allophyes oxyacanthae</i>	Green-brindled Crescent	insect - moth	24/12/2006	02/11/2007	4
<i>Amphipoea oculaea</i>	Ear Moth	insect - moth	24/12/2006	08/08/2007	3
<i>Amphipyra</i>		insect - moth	31/12/1995	06/09/2007	9
<i>Amphipyra tragopoginis</i>	Mouse Moth	insect - moth	31/12/1995	24/12/2006	3
<i>Agrochola macilenta</i>	Yellow-line Quaker	insect - moth	24/12/2006	-	1
<i>Poecilocampa populi</i>	December Moth	insect - moth	24/12/2006	26/11/2007	4
<i>Mesoligia furuncula</i>	Cloaked Minor	insect - moth	31/12/1995	02/09/2007	3
<i>Phyllonorycter trifasciella</i>	Honeysuckle Midget	insect - moth	10/10/2011	-	1
<i>Hepialus lupulinus</i>	Common Swift	insect - moth	16/06/1985	14/06/2007	4
<i>Hepialus sylvina</i>	Orange Swift	insect - moth	16/08/2003	02/09/2007	6
<i>Incurvaria masculella</i>	Feathered Bright	insect - moth	31/12/1995	-	1
<i>Euthrix potatoria</i>	Drinker	insect - moth	31/12/1995	13/07/2007	7
<i>Lasiocampa quercus</i>	Oak Eggar	insect - moth	31/07/1985	15/08/2007	2
<i>Acronicta leporina</i>	Miller	insect - moth	31/12/1995	10/06/2014	13
<i>Malacosoma neustria</i>	Lackey	insect - moth	31/07/1985	24/12/2006	2
<i>Phyllonorycter dubitella</i>	Southern Midget	insect - moth	08/11/2011	-	1
<i>Apoda limacodes</i>	Festoon	insect - moth	31/12/1995	13/07/2007	9
<i>Lyonetia clerkella</i>	Apple Leaf Miner	insect - moth	08/10/2011	-	1
<i>Stigmella aurella</i>	Golden Pigmy	insect - moth	10/10/2011	-	1
<i>Stigmella salicis</i>	Sallow Pigmy	insect - moth	08/10/2011	-	1
<i>Abrostola tripartita</i>	Spectacle	insect - moth	31/12/1995	15/08/2007	16
<i>Abrostola triplasia</i>	Dark Spectacle	insect - moth	24/05/2007	18/07/2007	2
<i>Acronicta</i>		insect - moth	31/12/1995	08/08/2007	12
<i>Macrothylacia rubi</i>	Fox Moth	insect - moth	31/07/1985	23/05/2007	8
<i>Deilephila porcellus</i>	Small Elephant Hawk-moth	insect - moth	31/12/1984	14/06/2007	7
<i>Pempelia genistella</i>	Gorse Knot-horn	insect - moth	31/07/2004	-	2
<i>Pempelia palumbella</i>	Heather Knot-horn	insect - moth	31/12/1995	10/06/2014	8
<i>Phycita roborella</i>	Dotted Oak Knot-horn	insect - moth	31/12/1995	16/06/2007	4
<i>Trachycera advenella</i>	Grey Knot-horn	insect - moth	31/07/2004	-	4
<i>Roeslerstammia erxlebella</i>	Copper Ermel	insect - moth	31/12/1995	-	1

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<i>Saturnia pavonia</i>	Emperor Moth	insect - moth	31/12/1995	30/03/2009	9
<i>Mesapamea didyma</i>	Lesser Common Rustic	insect - moth	26/08/2007	-	1
<i>Deilephila elpenor</i>	Elephant Hawk-moth	insect - moth	31/12/1995	18/07/2007	14
<i>Galleria mellonella</i>	Wax Moth	insect - moth	31/12/1995	-	1
<i>Hyloicus pinastri</i>	Pine Hawk-moth	insect - moth	31/12/1995	10/06/2014	45
<i>Laothoe populi</i>	Poplar Hawk-moth	insect - moth	31/12/1995	31/07/2007	14
<i>Macroglossum stellatarum</i>	Humming-bird Hawk-moth	insect - moth	24/12/2006	-	1
<i>Mimas tiliae</i>	Lime Hawk-moth	insect - moth	15/05/2004	05/06/2007	12
<i>Smerinthus ocellata</i>	Eyed Hawk-moth	insect - moth	31/12/1984	17/05/2007	5
<i>Sphinx ligustri</i>	Privet Hawk-moth	insect - moth	24/12/2006	10/07/2007	6
<i>Acleris bergmanniana</i>	Yellow Rose Button	insect - moth	09/08/2005	-	1
<i>Synanthedon culiciformis</i>	Large Red-belted Clearwing	insect - moth	31/12/1995	12/05/2009	2
<i>Aphomia sociella</i>	Bee Moth	insect - moth	31/12/1995	-	1
<i>Batia lambdella</i>	Greater Tawny Tubic	insect - moth	31/12/1995	-	1
<i>Crassa unitella</i>	Golden-brown Tubic	insect - moth	31/12/1995	-	1
<i>Endrosis sarcitrella</i>	White-shouldered House-moth	insect - moth	31/12/1995	-	1
<i>Pleurota bicostella</i>	Light Streak	insect - moth	31/12/1995	05/06/2013	3
<i>Carcina quercana</i>	Long-horned Flat-body	insect - moth	31/12/1995	10/06/2007	6
<i>Plutella xylostella</i>	Diamond-back Moth	insect - moth	13/07/2003	30/08/2004	8
<i>Capperia britanniodactyla</i>	Wood-sage Plume	insect - moth	31/12/1995	-	1
<i>Orthopygia glaucinalis</i>	Double-striped Tabby	insect - moth	31/12/1995	31/08/2005	4
<i>Acrobasis repandana</i>	Warted Knot-horn	insect - moth	16/06/2007	-	1
<i>Hypsopygia costalis</i>	Gold Triangle	insect - moth	31/12/1995	31/07/2004	3
<i>Cryptoblabes bistriga</i>	Double-striped Knot-horn	insect - moth	31/12/1995	-	1
<i>Dioryctria abietella</i>	Dark Pine Knot-horn	insect - moth	16/08/2003	16/06/2007	9
<i>Dioryctria simplicella</i>	Brown Pine Knot-horn	insect - moth	31/12/1995	10/06/2014	6
<i>Elegia similella</i>	White-barred Knot-horn	insect - moth	10/06/2007	-	1
<i>Endotricha flammealis</i>	Rosy Tabby	insect - moth	31/12/1995	11/07/2007	15
<i>Euzophera pinguis</i>	Ash-bark Knot-horn	insect - moth	31/07/2004	09/08/2005	2
<i>Acleris laterana</i>	Dark-triangle Button	insect - moth	31/07/2004	-	2
<i>Acrobasis consociella</i>	Broad-barred Knot-horn	insect - moth	16/06/2007	-	1
<i>Rhyacionia buoliana</i>	Pine Shoot Moth	insect - moth	20/08/2005	10/06/2014	3
<i>Acleris forsskaleana</i>	Maple Button	insect - moth	10/06/2007	-	1
<i>Epinotia solandriana</i>	Variable Bell	insect - moth	31/07/2004	-	2
<i>Eulia ministrana</i>	Brassy Twist	insect - moth	15/07/1997	-	1
<i>Lobesia reliquana</i>	Oak Marble	insect - moth	31/12/1995	-	1
<i>Lozotaeniodes formosanus</i>	Orange Pine Twist	insect - moth	12/07/2005	11/07/2007	2
<i>Pammene aurana</i>	Orange-spot Piercer	insect - moth	16/07/2014	-	1
<i>Pandemis cerasana</i>	Barred Fruit-tree Tortrix	insect - moth	09/08/2005	16/06/2007	2
<i>Epiblema turbidana</i>	Butterbur Bell	insect - moth	16/08/2003	-	2
<i>Pseudargyrotoza conwagana</i>	Yellow-spot Twist	insect - moth	16/06/2007	10/06/2014	2
<i>Epagoge grotiana</i>	Brown-barred Twist	insect - moth	15/07/1997	-	1
<i>Rhyacionia pinicolana</i>	Orange-spotted Shoot	insect - moth	15/07/1997	31/07/2004	3
<i>Rhyacionia pinivorana</i>	Spotted Shoot Moth	insect - moth	31/07/2004	-	2

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<i>Tortrix viridana</i>	Green Oak Tortrix	insect - moth	15/06/2004	16/06/2007	5
<i>Swammerdamia caesiella</i>	Birch Ermel	insect - moth	08/10/2011	-	1
<i>Yponomeuta evonymella</i>	Bird-cherry Ermine	insect - moth	05/07/2003	-	2
<i>Ypsolopha parenthesella</i>	White-shouldered Smudge	insect - moth	16/08/2003	-	2
<i>Zygaena lonicerae</i>	Narrow-bordered Five-spot Burnet	insect - moth	31/07/1985	-	1
<i>Pandemis heparana</i>	Dark Fruit-tree Tortrix	insect - moth	10/06/2007	-	1
<i>Archips xylosteana</i>	Variiegated Golden Tortrix	insect - moth	10/06/2007	16/06/2007	2
<i>Ptilodon capucina</i>	Coxcomb Prominent	insect - moth	31/07/1985	10/06/2014	18
<i>Acleris notana</i>	Rusty Birch Button	insect - moth	16/08/2003	25/10/2012	3
<i>Aethes tesserana</i>	Downland Conch	insect - moth	31/12/1995	-	1
<i>Agapeta hamana</i>	Common Yellow Conch	insect - moth	15/07/1997	15/06/2004	2
<i>Aleimma loeflingiana</i>	Yellow Oak Button	insect - moth	15/06/2004	16/06/2007	3
<i>Ancylis unguicella</i>	Broken-barred Roller	insect - moth	31/12/1995	-	1
<i>Apotomis betuletana</i>	Birch Marble	insect - moth	30/08/2004	09/08/2005	3
<i>Epiblema uddmanniana</i>	Bramble Shoot Moth	insect - moth	31/07/2004	28/06/2010	3
<i>Archips podana</i>	Large Fruit-tree Tortrix	insect - moth	05/07/2003	21/09/2005	4
<i>Acleris hyemana</i>	Heath Button	insect - moth	25/10/2012	04/12/2013	2
<i>Bactra lancealana</i>	Rush Marble	insect - moth	16/08/2003	-	2
<i>Celypha lacunana</i>	Common Marble	insect - moth	16/08/2003	-	2
<i>Cochylis dubitana</i>	Little Conch	insect - moth	16/08/2003	31/08/2005	3
<i>Cydia fagiglandana</i>	Large Beech Piercer	insect - moth	25/06/2013	-	1
<i>Cydia pomonella</i>	Codling Moth	insect - moth	15/06/2004	09/08/2005	4
<i>Cydia splendana</i>	Marbled Piercer	insect - moth	31/08/2005	-	1
<i>Ditula angustiorana</i>	Red-barred Tortrix	insect - moth	16/07/2014	-	1
<i>Apotomis turbidana</i>	White-shouldered Marble	insect - moth	10/06/2014	-	1
<i>Panolis flammea</i>	Pine Beauty	insect - moth	31/12/1995	08/06/2007	19
<i>Polia trimaculosa</i>	Silvery Arches	insect - moth	31/12/1995	-	1
<i>Omphaloscelis lunosa</i>	Lunar Underwing	insect - moth	15/09/2004	31/10/2007	8
<i>Orthosia cerasi</i>	Common Quaker	insect - moth	31/12/1995	04/05/2007	18
<i>Orthosia cruda</i>	Small Quaker	insect - moth	31/12/1995	14/05/2007	17
<i>Orthosia gothica</i>	Hebrew Character	insect - moth	31/12/1995	02/06/2007	26
<i>Orthosia gracilis</i>	Powdered Quaker	insect - moth	10/03/2007	17/04/2007	5
<i>Orthosia incerta</i>	Clouded Drab	insect - moth	31/12/1995	07/05/2007	19
<i>Oligia strigilis</i>	Marbled Minor	insect - moth	24/12/2006	14/06/2007	3
<i>Orthosia munda</i>	Twin-spotted Quaker	insect - moth	24/12/2006	13/04/2007	10
<i>Oligia latruncula</i>	Tawny Marbled Minor	insect - moth	24/12/2006	14/06/2007	4
<i>Paradrina clavipalpis</i>	Pale Mottled Willow	insect - moth	30/08/2004	-	1
<i>Parastichtis suspecta</i>	Suspected	insect - moth	31/12/1995	18/07/2007	7
<i>Parastichtis ypsilon</i>	Dingy Shears	insect - moth	20/08/2005	24/12/2006	3
<i>Peridroma saucia</i>	Pearly Underwing	insect - moth	24/12/2006	-	1
<i>Phlogophora meticulosa</i>	Angle Shades	insect - moth	08/09/1985	21/09/2007	21
<i>Photedes minima</i>	Small Dotted Buff	insect - moth	24/12/2006	05/06/2007	2
<i>Stauropus fagi</i>	Lobster Moth	insect - moth	31/12/1995	18/07/2007	20
<i>Orthosia miniosa</i>	Blossom Underwing	insect - moth	23/04/2007	-	1

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<i>Noctua fimbriata</i>	Broad-bordered Yellow Underwing	insect - moth	31/12/1995	27/09/2007	11
<i>Thera britannica</i>	Spruce Carpet	insect - moth	21/09/2005	26/11/2007	7
<i>Mythimna albipuncta</i>	White-point	insect - moth	13/07/2003	10/06/2014	19
<i>Mythimna comma</i>	Shoulder-striped Wainscot	insect - moth	31/12/1995	20/05/2007	4
<i>Mythimna ferrago</i>	Clay	insect - moth	12/07/2005	20/08/2005	3
<i>Mythimna impura</i>	Smoky Wainscot	insect - moth	31/12/1995	24/12/2006	6
<i>Mythimna pallens</i>	Common Wainscot	insect - moth	31/12/1995	06/09/2007	24
<i>Mythimna pudorina</i>	Striped Wainscot	insect - moth	31/12/1995	-	1
<i>Oligia versicolor</i>	Rufous Minor	insect - moth	24/12/2006	-	1
<i>Noctua comes</i>	Lesser Yellow Underwing	insect - moth	31/12/1985	12/10/2007	17
<i>Protodeltote pygarga</i>	Marbled White Spot	insect - moth	31/12/1995	10/06/2014	16
<i>Noctua interjecta</i>	Least Yellow Underwing	insect - moth	31/07/2004	06/09/2007	7
<i>Noctua interjecta subsp. caliginosa</i>	Least Yellow Underwing	insect - moth	31/12/1995	31/07/2004	2
<i>Noctua janthe</i>	Lesser Broad-bordered Yellow Underwi	insect - moth	31/12/1995	12/09/2007	18
<i>Noctua pronuba</i>	Large Yellow Underwing	insect - moth	31/12/1995	10/06/2014	48
<i>Nonagria typhae</i>	Bulrush Wainscot	insect - moth	24/12/2006	-	1
<i>Ochropleura plecta</i>	Flame Shoulder	insect - moth	31/12/1995	10/06/2014	32
<i>Oligia fasciuncula</i>	Middle-barred Minor	insect - moth	31/12/1995	24/12/2006	4
<i>Mythimna vitellina</i>	Delicate	insect - moth	24/12/2006	10/11/2007	6
<i>Notodonta ziczac</i>	Pebble Prominent	insect - moth	31/12/1995	10/06/2014	19
<i>Polia nebulosa</i>	Grey Arches	insect - moth	31/12/1995	08/06/2007	3
<i>Pseudoips prasinana subsp. britannica</i>	Green Silver-lines	insect - moth	31/12/1995	05/06/2007	2
<i>Cerura vinula</i>	Puss Moth	insect - moth	31/12/1984	31/12/1995	2
<i>Clostera curtula</i>	Chocolate-tip	insect - moth	24/12/2006	04/05/2007	2
<i>Drymonia dodonaea</i>	Marbled Brown	insect - moth	31/12/1995	10/06/2014	19
<i>Drymonia ruficornis</i>	Lunar Marbled Brown	insect - moth	31/12/1995	04/05/2007	11
<i>Furcula bifida</i>	Poplar Kitten	insect - moth	25/08/2007	-	1
<i>Nycteola revayana</i>	Oak Nycteoline	insect - moth	31/12/1995	11/07/2007	3
<i>Notodonta dromedarius</i>	Iron Prominent	insect - moth	31/12/1995	10/06/2014	35
<i>Nola confusalis</i>	Least Black Arches	insect - moth	31/12/1995	02/06/2007	6
<i>Odontosia carmelita</i>	Scarce Prominent	insect - moth	24/12/2006	-	1
<i>Peridea anceps</i>	Great Prominent	insect - moth	31/12/1995	17/05/2007	12
<i>Phalera bucephala</i>	Buff-tip	insect - moth	31/12/1995	10/06/2014	19
<i>Pheosia gnoma</i>	Lesser Swallow Prominent	insect - moth	31/12/1995	21/09/2007	34
<i>Pheosia tremula</i>	Swallow Prominent	insect - moth	31/12/1995	21/09/2007	26
<i>Pterostoma palpina</i>	Pale Prominent	insect - moth	31/12/1995	15/08/2007	17
<i>Mesapamea secalis</i>	Common Rustic	insect - moth	31/12/1995	15/08/2007	12
<i>Furcula furcula</i>	Sallow Kitten	insect - moth	31/12/1985	18/07/2007	10
<i>Xestia ditrapezium</i>	Triple-spotted Clay	insect - moth	31/12/1995	24/12/2006	2
<i>Rhizedra lutosa</i>	Large Wainscot	insect - moth	24/12/2006	-	1
<i>Rusina ferruginea</i>	Brown Rustic	insect - moth	31/12/1995	25/06/2013	5
<i>Tholera cespitis</i>	Hedge Rustic	insect - moth	24/12/2006	-	1
<i>Tholera decimalis</i>	Feathered Gothic	insect - moth	31/12/1995	13/09/2007	5
<i>Xanthia ictertia</i>	Sallow	insect - moth	21/09/2005	08/10/2011	5

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<i>Xestia agathina</i>	Heath Rustic	insect - moth	30/08/2004	21/09/2007	11
<i>Xestia baja</i>	Dotted Clay	insect - moth	31/12/1995	24/12/2006	2
<i>Pseudoips prasinana</i>	Green Silver-lines	insect - moth	15/06/2004	10/06/2014	4
<i>Xestia castanea</i>	Neglected Rustic	insect - moth	31/12/1995	21/09/2007	8
<i>Ptilodon cucullina</i>	Maple Prominent	insect - moth	16/08/2003	11/07/2007	3
<i>Xestia sexstrigata</i>	Six-striped Rustic	insect - moth	20/08/2005	26/08/2007	7
<i>Xestia triangulum</i>	Double-square Spot	insect - moth	31/12/1995	11/07/2007	6
<i>Xestia xanthographa</i>	Square-spot Rustic	insect - moth	31/12/1995	21/09/2007	18
<i>Xylena vetusta</i>	Red Sword-grass	insect - moth	11/03/2012	-	1
<i>Xylocampa areola</i>	Early Grey	insect - moth	31/12/1995	23/04/2007	14
<i>Meganola albula</i>	Kent Black Arches	insect - moth	10/07/2007	-	1
<i>Meganola strigula</i>	Small Black Arches	insect - moth	24/12/2006	-	1
<i>Xestia c-nigrum</i>	Setaceous Hebrew Character	insect - moth	31/12/1995	24/10/2012	26
<i>Geometra papilionaria</i>	Large Emerald	insect - moth	31/07/1985	10/07/2007	8
<i>Eupithecia indigata</i>	Ochreous Pug	insect - moth	31/12/1995	24/12/2006	4
<i>Idaea biselata</i>	Small Fan-footed Wave	insect - moth	31/12/1995	06/08/2007	10
<i>Idaea aversata</i>	Riband Wave	insect - moth	31/07/1985	21/09/2007	32
<i>Hypomecis roboraria</i>	Great Oak Beauty	insect - moth	31/12/1995	10/06/2014	11
<i>Hypomecis punctinalis</i>	Pale Oak Beauty	insect - moth	31/12/1995	14/06/2007	15
<i>Hylaea fasciaria</i>	Barred Red	insect - moth	31/07/1985	16/06/2007	12
<i>Hydriomena furcata</i>	July Highflyer	insect - moth	31/12/1995	24/12/2006	4
<i>Hydrelia flammeolaria</i>	Small Yellow Wave	insect - moth	31/12/1995	16/06/2007	7
<i>Horisme vitalbata</i>	Small Waved Umber	insect - moth	31/07/2004	24/12/2006	4
<i>Hemithea aestivaria</i>	Common Emerald	insect - moth	31/12/1995	13/07/2007	10
<i>Idaea emarginata</i>	Small Scallop	insect - moth	31/12/1995	-	1
<i>Gymnoscelis rufasciata</i>	Double-striped Pug	insect - moth	31/12/1995	24/12/2006	10
<i>Idaea fuscovenosa</i>	Dwarf Cream Wave	insect - moth	31/07/2004	10/06/2014	5
<i>Eupithecia vulgata</i>	Common Pug	insect - moth	31/12/1995	06/09/2007	4
<i>Eupithecia tripunctaria</i>	White-spotted Pug	insect - moth	31/12/1995	24/05/2007	7
<i>Eupithecia tenuiata</i>	Slender Pug	insect - moth	15/05/2007	23/05/2007	2
<i>Eupithecia tantillaria</i>	Dwarf Pug	insect - moth	31/12/1995	-	1
<i>Eupithecia succenturiata</i>	Bordered Pug	insect - moth	31/12/1995	-	1
<i>Eupithecia subfuscata</i>	Grey Pug	insect - moth	31/12/1995	25/06/2013	7
<i>Eupithecia pusillata</i>	Juniper Pug	insect - moth	24/12/2006	-	1
<i>Eupithecia pulchellata</i>	Foxglove Pug	insect - moth	31/12/1995	18/07/2007	10
<i>Eupithecia nanata</i>	Narrow-winged Pug	insect - moth	31/12/1995	10/06/2014	26
<i>Eupithecia inturbata</i>	Maple Pug	insect - moth	31/12/1995	24/12/2006	3
<i>Eupithecia innotata</i>	Angle-barred Pug	insect - moth	24/12/2006	-	1
<i>Hemistola chrysoprasaria</i>	Small Emerald	insect - moth	31/12/1995	-	1
<i>Lycia hirtaria</i>	Brindled Beauty	insect - moth	24/04/2004	20/05/2007	15
<i>Macaria alternata</i>	Sharp-angled Peacock	insect - moth	16/08/2003	24/05/2007	2
<i>Macaria liturata</i>	Tawny-barred Angle	insect - moth	31/12/1995	06/09/2007	26
<i>Macaria notata</i>	Peacock Moth	insect - moth	31/12/1995	25/08/2007	25
<i>Melanthia procellata</i>	Pretty Chalk Carpet	insect - moth	31/12/1995	-	1

Latin Name	Common Name	Taxon Group	First Date	Last Date	No. of Rec's
<i>Menophra abruptaria</i>	Waved Umber	insect - moth	23/04/2007	-	1
<i>Odontopera bidentata</i>	Scalloped Hazel	insect - moth	31/12/1995	24/05/2007	8
<i>Operophtera brumata</i>	Winter Moth	insect - moth	24/12/2006	26/11/2007	4
<i>Opisthograptis luteolata</i>	Brimstone Moth	insect - moth	31/12/1995	27/09/2007	36
<i>Ourapteryx sambucaria</i>	Swallow-tailed Moth	insect - moth	31/07/1985	24/12/2006	3
<i>Pachycnemia hippocastanaria</i>	Horse Chestnut	insect - moth	31/12/1995	24/10/2012	28
<i>Idaea dimidiata</i>	Single-dotted Wave	insect - moth	31/12/1995	-	1
<i>Thera obeliscata</i>	Grey Pine Carpet	insect - moth	31/07/1985	25/06/2013	61
<i>Eupithecia trisignaria</i>	Triple-spotted Pug	insect - moth	31/07/2004	-	1
<i>Lomographa temerata</i>	Clouded Silver	insect - moth	31/12/1995	10/06/2007	2
<i>Lomographa bimaculata</i>	White-pinion Spotted	insect - moth	31/12/1995	08/06/2007	3
<i>Lomaspilis marginata</i>	Clouded Border	insect - moth	31/12/1995	10/06/2014	17
<i>Ligdia adustata</i>	Scorched Carpet	insect - moth	13/04/2007	-	1
<i>Lampropteryx suffumata</i>	Water Carpet	insect - moth	06/06/2004	-	1
<i>Jodis lactearia</i>	Little Emerald	insect - moth	31/12/1995	13/07/2007	6
<i>Idaea trigeminata</i>	Treble Brown Spot	insect - moth	24/12/2006	08/06/2007	4
<i>Idaea sylvestriaria</i>	Dotted Border Wave	insect - moth	31/12/1995	11/07/2007	9
<i>Idaea subsericeata</i>	Satin Wave	insect - moth	31/12/1995	14/06/2007	7
<i>Idaea straminata</i>	Plain Wave	insect - moth	31/12/1995	13/07/2007	7
<i>Idaea seriata</i>	Small Dusty Wave	insect - moth	12/07/2005	-	1
<i>Paradarisa consonaria</i>	Square Spot	insect - moth	31/12/1995	24/12/2006	2
<i>Chloroclysta truncata</i>	Common Marbled Carpet	insect - moth	31/12/1995	24/10/2007	6
<i>Ectropis bistortata</i>	Engrailed	insect - moth	31/12/1995	11/07/2007	16
<i>Ecliptopera silaceata</i>	Small Phoenix	insect - moth	31/12/1995	31/07/2004	2
<i>Cyclophora punctaria</i>	Maiden's Blush	insect - moth	31/07/1985	06/09/2007	20
<i>Cyclophora linearia</i>	Clay Triple-lines	insect - moth	16/08/2003	-	1
<i>Cyclophora annularia</i>	Mocha	insect - moth	24/12/2006	26/08/2007	2
<i>Cyclophora albipunctata</i>	Birch Mocha	insect - moth	31/12/1995	28/07/2008	26
<i>Crocallis elinguaris</i>	Scalloped Oak	insect - moth	31/12/1995	10/07/2007	5
<i>Cosmorhoe ocellata</i>	Purple Bar	insect - moth	16/08/2003	15/08/2007	4
<i>Comibaena bajularia</i>	Blotched Emerald	insect - moth	31/12/1995	10/06/2007	9
<i>Eupithecia icterata subsp. subfulvata</i>	Tawny Speckled Pug	insect - moth	31/08/2005	24/05/2007	2
<i>Colostygia pectinataria</i>	Green Carpet	insect - moth	31/12/1995	12/09/2007	17
<i>Ectropis crepuscularia</i>	Small Engrailed	insect - moth	31/12/1995	13/04/2007	3
<i>Chloroclystis v-ata</i>	V-pug	insect - moth	13/07/2003	24/12/2006	2
<i>Colotois pennaria</i>	Feathered Thorn	insect - moth	31/07/1985	26/11/2007	7
<i>Chloroclysta siterata</i>	Red-green Carpet	insect - moth	24/12/2006	-	1
<i>Campogramma bilineata</i>	Yellow Shell	insect - moth	24/12/2006	26/08/2007	3
<i>Campaea margaritata</i>	Light Emerald	insect - moth	31/12/1995	10/06/2014	27
<i>Cabera pusaria</i>	Common White Wave	insect - moth	31/12/1995	10/06/2014	17
<i>Cabera exanthemata</i>	Common Wave	insect - moth	31/12/1995	02/09/2007	15
<i>Bupalus piniaria</i>	Bordered White	insect - moth	31/07/1985	08/06/2007	8
<i>Biston strataria</i>	Oak Beauty	insect - moth	07/03/2007	14/06/2007	18
<i>Biston betularia form insularia</i>	Peppered Moth	insect - moth	06/06/2004	13/07/2007	3

Latin Name	Common Name	Taxon Group	First Date	Last Date	No. of Rec's
<i>Biston betularia form carbonaria</i>	Peppered Moth	insect - moth	19/07/2004	07/07/2007	3
<i>Biston betularia</i>	Peppered Moth	insect - moth	31/12/1995	10/06/2014	27
<i>Archiearis parthenias</i>	Orange Underwing	insect - moth	10/03/2007	30/03/2009	3
<i>Eupithecia vulgata subsp. vulgata</i>	Common Pug	insect - moth	24/12/2006	10/06/2007	2
<i>Eupithecia dodoneata</i>	Oak-tree Pug	insect - moth	15/05/2004	24/05/2007	4
<i>Cidaria fulvata</i>	Barred Yellow	insect - moth	14/06/2007	-	1
<i>Eupithecia exiguata</i>	Mottled Pug	insect - moth	31/12/1995	23/04/2008	4
<i>Electrophaes corylata</i>	Broken-barred Carpet	insect - moth	31/12/1995	14/06/2007	12
<i>Eupithecia centaureata</i>	Lime-speck Pug	insect - moth	31/12/1995	24/12/2006	5
<i>Eupithecia assimilata</i>	Currant Pug	insect - moth	24/05/2007	-	1
<i>Eupithecia absinthiata form goossensiata</i>	Ling Pug	insect - moth	31/12/1995	09/08/2005	2
<i>Eupithecia absinthiata</i>	Wormwood Pug	insect - moth	16/08/2003	31/07/2004	4
<i>Eupithecia abbreviata</i>	Brindled Pug	insect - moth	24/12/2006	08/06/2007	18
<i>Euphyia unangulata</i>	Sharp-angled Carpet	insect - moth	31/12/1995	31/07/2004	2
<i>Euphyia biangulata</i>	Cloaked Carpet	insect - moth	31/07/2004	-	1
<i>Eulithis testata</i>	Chevron	insect - moth	31/12/1995	-	1
<i>Ennomos fuscantaria</i>	Dusky Thorn	insect - moth	31/08/2005	21/09/2007	5
<i>Eupithecia icterata</i>	Tawny Speckled Pug	insect - moth	31/12/1995	24/12/2006	2
<i>Eulithis pyraliata</i>	Barred Straw	insect - moth	31/12/1995	-	1
<i>Ennomos alniaria</i>	Canary-shouldered Thorn	insect - moth	31/12/1995	21/09/2007	20
<i>Ennomos quercinaria</i>	August Thorn	insect - moth	24/12/2006	-	1
<i>Epione repandaria</i>	Bordered Beauty	insect - moth	16/09/2003	-	1
<i>Epirrhoe alternata</i>	Common Carpet	insect - moth	08/08/2007	15/08/2007	2
<i>Erannis defoliaria</i>	Mottled Umber	insect - moth	24/12/2006	30/12/2007	13
<i>Epirrita</i>	Indet. November Moth	insect - moth	24/12/2006	24/10/2012	10
<i>Epirrita autumnata</i>	Autumnal Moth	insect - moth	26/10/2007	10/11/2007	3
<i>Epirrita dilutata</i>	November Moth	insect - moth	24/10/2007	26/11/2007	6
<i>Epirrhoe alternata subsp. alternata</i>	Common Carpet	insect - moth	31/08/2005	24/12/2006	2
<i>Ematurga atomaria</i>	Common Heath	insect - moth	16/06/1985	31/05/2012	5
<i>Hercostomus nigripennis</i>		insect - true fly (Diptera)	07/09/2003	-	1
<i>Platypalpus minutus</i>		insect - true fly (Diptera)	31/12/1988	-	1
<i>Euphylidorea meigenii</i>		insect - true fly (Diptera)	31/08/1996	21/08/1997	4
<i>Phylidorea fulvonervosa</i>		insect - true fly (Diptera)	07/09/2003	-	1
<i>Cheilosia variabilis</i>		insect - true fly (Diptera)	16/06/1985	31/08/1996	3
<i>Mesembrina meridiana</i>		insect - true fly (Diptera)	16/06/1985	-	1
<i>Trypetoptera punctulata</i>		insect - true fly (Diptera)	07/09/2003	-	1
<i>Cheilosia ahenea</i>		insect - true fly (Diptera)	31/12/1984	-	1
<i>Thecophora atra</i>		insect - true fly (Diptera)	31/08/1996	-	2
<i>Cheilosia illustrata</i>		insect - true fly (Diptera)	22/07/2014	-	1
<i>Eutolmus rufibarbis</i>	Golden-tabbed Robberfly	insect - true fly (Diptera)	31/07/2012	-	1
<i>Mycomya fimbriata</i>		insect - true fly (Diptera)	31/08/1996	-	2
<i>Sicus ferrugineus</i>		insect - true fly (Diptera)	16/06/1985	31/12/1988	3
<i>Conops ceriaeformis</i>		insect - true fly (Diptera)	31/12/1989	-	1
<i>Thyridanthrax fenestratus</i>	Mottled Bee-fly	insect - true fly (Diptera)	07/09/2003	28/06/2010	3

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<i>Bombylius major</i>	Dark-edged Bee-fly	insect - true fly (Diptera)	28/03/2007	-	1
<i>Dilophus febrilis</i>	Fever Fly	insect - true fly (Diptera)	07/09/2003	-	1
<i>Machimus atricapillus</i>	Kite-tailed Robberfly	insect - true fly (Diptera)	31/12/1988	07/09/2003	2
<i>Epitriptus cingulatus</i>		insect - true fly (Diptera)	31/12/1989	-	1
<i>Dysmachus trigonus</i>	Fan-bristled Robberfly	insect - true fly (Diptera)	07/09/2003	-	1
<i>Asilus crabroniformis</i>	Hornet Robberfly	insect - true fly (Diptera)	08/09/2008	01/08/2013	2
<i>Platycheirus albimanus</i>		insect - true fly (Diptera)	16/06/1985	08/09/1985	2
<i>Chrysogaster solstitialis</i>		insect - true fly (Diptera)	31/08/1996	-	2
<i>Machimus cingulatus</i>	Brown Heath Robberfly	insect - true fly (Diptera)	07/09/2003	19/09/2012	2
<i>Phasia pusilla</i>		insect - true fly (Diptera)	07/09/2003	-	1
<i>Syrirta pipiens</i>		insect - true fly (Diptera)	08/09/1985	07/09/2003	5
<i>Syrphus ribesii</i>		insect - true fly (Diptera)	16/06/1985	-	1
<i>Volucella bombylans</i>		insect - true fly (Diptera)	07/09/2003	-	2
<i>Volucella pellucens</i>		insect - true fly (Diptera)	07/09/2003	30/06/2014	2
<i>Tipula livida</i>		insect - true fly (Diptera)	31/08/1996	-	1
<i>Xylota segnis</i>		insect - true fly (Diptera)	31/08/1996	-	2
<i>Sphaerophoria virgata</i>		insect - true fly (Diptera)	31/12/1989	-	1
<i>Nowickia ferox</i>		insect - true fly (Diptera)	30/07/2014	-	1
<i>Xanthogramma citrofasciatum</i>		insect - true fly (Diptera)	07/09/2003	-	1
<i>Tachina grossa</i>		insect - true fly (Diptera)	03/08/2013	30/07/2014	4
<i>Tephritis neesii</i>		insect - true fly (Diptera)	10/03/2007	-	1
<i>Nephrotoma scurra</i>		insect - true fly (Diptera)	07/09/2003	-	1
<i>Tipula cava</i>		insect - true fly (Diptera)	14/07/1997	07/09/2003	3
<i>Tipula paludosa</i>		insect - true fly (Diptera)	07/09/2003	-	1
<i>Neoscasia podagrica</i>		insect - true fly (Diptera)	16/06/1985	-	1
<i>Episyrphus balteatus</i>	Marmalade Hoverfly	insect - true fly (Diptera)	08/09/1985	31/08/1996	3
<i>Eriothrix rufomaculata</i>		insect - true fly (Diptera)	31/12/1988	-	1
<i>Microdon analis</i>		insect - true fly (Diptera)	28/05/2012	-	1
<i>Haematopota crassicornis</i>	Black-horned Cleg	insect - true fly (Diptera)	16/06/1985	-	1
<i>Sphaerophoria scripta</i>		insect - true fly (Diptera)	31/12/1989	31/05/2012	5
<i>Leucozona lucorum</i>		insect - true fly (Diptera)	16/06/1985	-	1
<i>Melanogaster aerea</i>		insect - true fly (Diptera)	16/06/1985	-	1
<i>Eupeodes corollae</i>		insect - true fly (Diptera)	07/09/2003	-	1
<i>Merodon equestris</i>	Greater Bulb-Fly	insect - true fly (Diptera)	16/06/1985	-	1
<i>Helophilus pendulus</i>		insect - true fly (Diptera)	16/06/1985	07/09/2003	3
<i>Eristalis tenax</i>		insect - true fly (Diptera)	08/09/1985	07/09/2003	3
<i>Paragus haemorrhous</i>		insect - true fly (Diptera)	16/06/1985	07/09/2003	2
<i>Eristalis pertinax</i>		insect - true fly (Diptera)	16/06/1985	-	1
<i>Platycheirus clypeatus</i>		insect - true fly (Diptera)	31/12/1989	-	1
<i>Platycheirus rosarum</i>		insect - true fly (Diptera)	31/12/1989	-	1
<i>Rhingia campestris</i>		insect - true fly (Diptera)	08/09/1985	07/09/2003	2
<i>Sericomyia lappona</i>		insect - true fly (Diptera)	07/09/2003	-	1
<i>Sericomyia silentis</i>		insect - true fly (Diptera)	07/09/2003	-	2
<i>Melanostoma mellinum</i>		insect - true fly (Diptera)	16/06/1985	31/08/1996	3

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<i>Myrmica scabrinodis</i>		insect - hymenopteran	11/08/1981	17/08/2007	7
<i>Stenamamma debile</i>		insect - hymenopteran	12/07/2009	-	1
<i>Tapinoma erraticum</i>	Erratic Ant	insect - hymenopteran	13/06/2007	06/07/2008	4
<i>Temnothorax nylanderi</i>		insect - hymenopteran	16/07/2009	-	1
<i>Rhyssa persuasoria</i>		insect - hymenopteran	31/12/1988	-	1
<i>Mutilla europaea</i>	Large Velvet Ant	insect - hymenopteran	28/08/1998	-	1
<i>Myrmosa atra</i>	Black Headed Velvet Ant	insect - hymenopteran	11/08/1981	06/07/2008	10
<i>Smicromyrme rufipes</i>	Small Velvet Ant	insect - hymenopteran	18/08/1993	06/07/2008	6
<i>Agenioideus cinctellus</i>		insect - hymenopteran	31/12/1989	18/08/1993	3
<i>Anoplius (Anoplius) concinnus</i>		insect - hymenopteran	18/08/1993	-	2
<i>Anoplius (Anoplius) nigerrimus</i>		insect - hymenopteran	27/06/1982	17/08/2007	16
<i>Anoplius (Arachnoproctonus) viaticus</i>	Black-banded Spider Wasp	insect - hymenopteran	31/12/1993	04/08/2007	3
<i>Arachnospila (Ammosphex) anceps</i>		insect - hymenopteran	08/08/1981	31/12/1993	2
<i>Myrmica sabuleti</i>		insect - hymenopteran	11/08/1981	16/07/2009	3
<i>Aporus unicolor</i>		insect - hymenopteran	26/08/1974	31/07/1985	3
<i>Anoplius (Arachnoproctonus) infuscatus</i>		insect - hymenopteran	21/08/1974	07/09/2003	3
<i>Lasius niger</i>		insect - hymenopteran	17/07/1976	07/09/2003	9
<i>Trypoxylon clavicerum</i>	Club Horned Wood Borer Wasp	insect - hymenopteran	12/08/1984	31/12/1989	2
<i>Trypoxylon figulus</i>	Black Wood Borer Wasp	insect - hymenopteran	18/08/1993	-	1
<i>Ammophila sabulosa</i>	Red Banded Sand Wasp	insect - hymenopteran	11/08/1981	10/07/2011	19
<i>Trypoxylon medium</i>		insect - hymenopteran	06/07/1982	05/08/1995	2
<i>Arachnospila (Ammosphex) trivialis</i>		insect - hymenopteran	14/08/1988	18/08/1993	3
<i>Formica fusca</i>	Negro Ant	insect - hymenopteran	19/07/1982	16/07/2009	19
<i>Formica rufa</i>	Red Wood Ant	insect - hymenopteran	16/06/1985	13/06/2007	4
<i>Formica cunicularia</i>		insect - hymenopteran	09/07/1984	31/12/1989	2
<i>Lasius alienus</i>		insect - hymenopteran	10/09/1981	07/09/2003	3
<i>Myrmica ruginodis</i>		insect - hymenopteran	16/06/1984	17/08/2007	13
<i>Lasius flavus</i>	Yellow Meadow Ant	insect - hymenopteran	16/06/1985	16/07/2009	2
<i>Lasius fuliginosus</i>	Jet Ant	insect - hymenopteran	17/08/2007	-	1
<i>Lasius niger</i>	Small Black Ant	insect - hymenopteran	16/06/1985	17/08/2007	6
<i>Lasius platythorax</i>		insect - hymenopteran	08/06/2007	23/07/2009	5
<i>Lasius umbratus</i>		insect - hymenopteran	26/07/1984	-	1
<i>Leptothorax acervorum</i>	Slender Ant	insect - hymenopteran	01/06/1981	16/07/2009	10
<i>Myrmica rubra</i>	Red Ant	insect - hymenopteran	02/08/1997	-	1
<i>Formica sanguinea</i>	Slaver Ant	insect - hymenopteran	17/05/1980	10/07/2011	17
<i>Symmorphus bifasciatus</i>		insect - hymenopteran	31/07/1984	31/12/1989	2
<i>Ancistrocerus gazella</i>		insect - hymenopteran	08/08/1984	26/08/1984	2
<i>Ancistrocerus trifasciatus</i>		insect - hymenopteran	27/06/1982	28/08/1998	4
<i>Dolichovespula (Dolichovespula) media</i>		insect - hymenopteran	31/12/1993	-	1
<i>Dolichovespula (Pseudovespula) saxonica</i>		insect - hymenopteran	21/08/1996	10/07/2011	4
<i>Dolichovespula (Pseudovespula) sylvestris</i>	Tree Wasp	insect - hymenopteran	31/12/1993	-	1
<i>Eumenes coarctatus</i>	Heath Potter Wasp	insect - hymenopteran	21/08/1974	07/09/2003	7
<i>Urocerus gigas</i>	Greater Horntail Wasp	insect - hymenopteran	31/12/1988	-	1
<i>Microdynerus exilis</i>		insect - hymenopteran	01/08/1984	-	1

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<i>Methocha articulata</i>		insect - hymenopteran	17/08/1981	08/06/2007	7
<i>Symmorphus gracilis</i>		insect - hymenopteran	31/12/1989	07/09/2003	3
<i>Vespa crabro</i>	Hornet	insect - hymenopteran	07/09/2003	22/07/2014	5
<i>Vespula (Paravespula) germanica</i>	German Wasp	insect - hymenopteran	04/08/2007	17/08/2007	2
<i>Vespula (Paravespula) vulgaris</i>	Common Wasp	insect - hymenopteran	21/08/1974	31/08/1996	8
<i>Vespula (Vespula) rufa</i>	Red Wasp	insect - hymenopteran	11/08/1981	31/12/1993	5
<i>Pemphredon (Cemonus) inornata</i>	Shuckard's Wasp	insect - hymenopteran	12/08/1984	31/12/1989	2
<i>Trypoxylon attenuatum</i>	Slender Wood Borer Wasp	insect - hymenopteran	16/06/1985	31/12/1989	2
<i>Gymnomerus laevipes</i>		insect - hymenopteran	31/12/1989	-	1
<i>Priocnemis (Priocnemis) parvula</i>		insect - hymenopteran	31/12/1989	04/08/2007	2
<i>Arachnospila (Anoplochaes) spissa</i>		insect - hymenopteran	31/12/1989	13/06/2007	4
<i>Caliadurgus fasciatellus</i>		insect - hymenopteran	17/08/1985	31/12/1989	3
<i>Cryptocheilus (Adonta) notatus</i>		insect - hymenopteran	17/08/2007	-	1
<i>Episyron rufipes</i>	Red Legged Spider Wasp	insect - hymenopteran	23/06/1984	17/08/2007	11
<i>Evagetes crassicornis</i>		insect - hymenopteran	19/08/1987	31/12/1989	2
<i>Evagetes dubius</i>		insect - hymenopteran	11/08/1981	17/08/2007	12
<i>Pompilus cinereus</i>	Leaden Spider Wasp	insect - hymenopteran	24/08/1974	17/08/2007	9
<i>Tiphia minuta</i>	Small Tiphia	insect - hymenopteran	13/06/2007	-	1
<i>Priocnemis (Priocnemis) hyalinata</i>		insect - hymenopteran	17/08/1985	31/12/1989	2
<i>Tiphia femorata</i>		insect - hymenopteran	12/08/1984	31/12/1989	4
<i>Priocnemis (Priocnemis) pusilla</i>		insect - hymenopteran	14/08/1984	28/07/1988	2
<i>Priocnemis (Priocnemis) schioedtei</i>		insect - hymenopteran	31/12/1979	28/07/1988	3
<i>Priocnemis (Umbripennis) coriacea</i>		insect - hymenopteran	09/05/1999	09/06/2007	3
<i>Priocnemis (Umbripennis) susterai</i>		insect - hymenopteran	16/06/1984	31/12/1989	3
<i>Priocnemis confusor</i>		insect - hymenopteran	14/08/1984	10/09/1984	2
<i>Ammophila pubescens</i>	Heath Sand Wasp	insect - hymenopteran	21/08/1974	19/09/2012	23
<i>Arachnospila (Anoplochaes) minutula</i>		insect - hymenopteran	14/08/1981	15/07/1984	2
<i>Priocnemis (Priocnemis) exaltata</i>		insect - hymenopteran	08/08/1984	25/07/1989	2
<i>Hoplitis (Alcidamea) claviventris</i>		insect - hymenopteran	23/06/1984	31/12/1989	3
<i>Andrena (Hoplodrena) trimmerana</i>	Trimmer's Mining Bee	insect - hymenopteran	13/06/2007	-	1
<i>Lasioglossum (Evylaeus) calceatum</i>	Slender Mining Bee	insect - hymenopteran	13/08/1975	31/12/1989	6
<i>Lasioglossum (Evylaeus) albipes</i>		insect - hymenopteran	19/07/1982	02/08/1997	3
<i>Lasioglossum (Dialictus) morio</i>	Brassy Mining Bee	insect - hymenopteran	31/05/1975	04/08/2007	5
<i>Lasioglossum (Dialictus) leucopus</i>		insect - hymenopteran	08/08/1982	31/12/1989	5
<i>Hylaeus (Prosopis) gibbus</i>		insect - hymenopteran	31/07/1984	09/07/1994	5
<i>Hylaeus (Prosopis) confusus</i>		insect - hymenopteran	14/08/1984	02/08/1997	7
<i>Hylaeus (Prosopis) brevicornis</i>	Short Horned Yellow-Face Bee	insect - hymenopteran	17/07/1983	31/08/1996	9
<i>Lasioglossum (Evylaeus) malachurum</i>		insect - hymenopteran	10/05/1998	-	1
<i>Hylaeus (Hylaeus) communis</i>	Common Yellow Face Bee	insect - hymenopteran	01/02/1978	31/08/1996	12
<i>Lasioglossum (Evylaeus) minutissimum</i>	Least Mining Bee	insect - hymenopteran	13/05/1979	18/08/1993	3
<i>Heriades truncorum</i>		insect - hymenopteran	31/12/1989	-	1
<i>Halictus (Seladonia) tumulorum</i>		insect - hymenopteran	08/08/1984	10/07/2011	4
<i>Halictus (Seladonia) confusus</i>		insect - hymenopteran	19/07/1982	31/12/1989	4
<i>Andrena (Andrena) clarkella</i>		insect - hymenopteran	31/12/1993	-	1

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<i>Andrena (Andrena) praecox</i>		insect - hymenopteran	31/12/1993	-	1
<i>Andrena (Chlorandrena) humilis</i>		insect - hymenopteran	10/05/1998	-	1
<i>Andrena (Cnemidandrena) denticulata</i>		insect - hymenopteran	31/12/1989	09/07/1990	2
<i>Andrena (Cnemidandrena) fuscipes</i>		insect - hymenopteran	10/08/1981	17/08/2007	25
<i>Nomada fucata</i>		insect - hymenopteran	18/08/1993	19/07/2007	4
<i>Hylaeus (Lamdopsis) dilatatus</i>		insect - hymenopteran	31/12/1989	14/07/1990	2
<i>Megachile (Delomegachile) willughbiella</i>	Willughby's Leaf-Cutter Bee	insect - hymenopteran	17/07/1983	07/09/2003	8
<i>Nomada flavoguttata</i>		insect - hymenopteran	08/08/1982	31/12/1989	2
<i>Nomada flava</i>		insect - hymenopteran	13/05/1979	10/05/1998	3
<i>Nomada fabriciana</i>	Fabricius' Nomad Bee	insect - hymenopteran	08/08/1984	31/12/1989	2
<i>Nomada baccata</i>		insect - hymenopteran	18/08/2005	04/08/2007	2
<i>Melitta tricincta</i>		insect - hymenopteran	31/12/1989	-	1
<i>Melitta leporina</i>		insect - hymenopteran	12/08/1984	-	1
<i>Megachile (Xanthosarus) maritima</i>	Coastal Leaf-Cutter Bee	insect - hymenopteran	09/07/1994	-	1
<i>Megachile (Megachile) versicolor</i>		insect - hymenopteran	17/07/1982	17/08/2007	10
<i>Lasioglossum (Evylaeus) fulvicorne</i>		insect - hymenopteran	26/08/1984	-	1
<i>Megachile (Megachile) centuncularis</i>	Patchwork Leaf-Cutter Bee	insect - hymenopteran	19/07/1982	10/07/2011	3
<i>Andrena (Leucandrena) argentata</i>		insect - hymenopteran	28/08/1983	10/07/2011	8
<i>Lasioglossum (Lasioglossum) zonulum</i>		insect - hymenopteran	31/05/1975	31/12/1989	6
<i>Lasioglossum (Lasioglossum) prasinum</i>		insect - hymenopteran	23/06/1984	10/07/2011	11
<i>Lasioglossum (Lasioglossum) leucozonium</i>		insect - hymenopteran	08/08/1982	10/05/1998	7
<i>Lasioglossum (Lasioglossum) lativentre</i>		insect - hymenopteran	31/12/1989	-	1
<i>Lasioglossum (Evylaeus) villosulum</i>	Shaggy Mining Bee	insect - hymenopteran	17/05/1980	31/12/1989	2
<i>Lasioglossum (Evylaeus) punctatissimum</i>		insect - hymenopteran	31/05/1975	13/06/2007	8
<i>Trypoxylon figulus</i>	Black Wood Borer Wasp	insect - hymenopteran	31/07/1984	18/08/1993	2
<i>Lasioglossum (Evylaeus) parvulum</i>		insect - hymenopteran	31/12/1979	10/07/2011	6
<i>Pemphredon (Ceratophorus) morio</i>		insect - hymenopteran	31/12/1989	-	1
<i>Megachile (Megachile) ligniseca</i>	Wood-Carving Leaf-Cutter Bee	insect - hymenopteran	14/08/1984	10/07/2011	3
<i>Coelioxys (Coelioxys) conoidea</i>		insect - hymenopteran	10/07/2011	-	1
<i>Andrena (Euandrena) bicolor</i>	Gwynne's Mining Bee	insect - hymenopteran	19/07/1982	31/12/1989	3
<i>Bombus (Melanobombus) lapidarius</i>	Large Red Tailed Bumble Bee	insect - hymenopteran	17/07/1984	10/07/2011	8
<i>Bombus (Psithyrus) campestris</i>	Field Cuckoo Bee	insect - hymenopteran	31/05/1975	07/09/2003	4
<i>Bombus (Psithyrus) sylvestris</i>	Four Coloured Cuckoo Bee	insect - hymenopteran	10/07/2011	-	1
<i>Bombus (Psithyrus) vestalis</i>	Vestal Cuckoo Bee	insect - hymenopteran	04/08/2007	-	1
<i>Bombus (Pyrobombus) jonellus</i>	Heath Bumble Bee	insect - hymenopteran	01/01/1984	10/07/2011	12
<i>Bombus (Pyrobombus) pratorum</i>	Early Bumble Bee	insect - hymenopteran	31/12/1993	-	1
<i>Bombus (Thoracobombus) pascuorum</i>	Common Carder Bee	insect - hymenopteran	21/08/1974	31/05/2012	15
<i>Bombus (Bombus) terrestris</i>	Buff-Tailed Bumble Bee	insect - hymenopteran	21/08/1974	17/08/2007	9
<i>Coelioxys conoidea</i>		insect - hymenopteran	04/08/2007	-	1
<i>Bombus (Bombus) lucorum</i>	White-Tailed Bumble Bee	insect - hymenopteran	16/06/1985	10/07/2011	7
<i>Coelioxys (Coelioxys) elongata</i>		insect - hymenopteran	19/07/1982	09/07/1984	2
<i>Coelioxys (Coelioxys) inermis</i>		insect - hymenopteran	08/08/1982	-	1
<i>Coelioxys (Coelioxys) rufescens</i>		insect - hymenopteran	28/06/1984	-	1
<i>Colletes (Colletes) daviesanus</i>		insect - hymenopteran	29/07/1984	18/08/1993	3

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<i>Colletes (Colletes) fodiens</i>		insect - hymenopteran	28/08/1974	-	1
<i>Colletes (Colletes) similis</i>		insect - hymenopteran	31/12/1989	09/07/1990	2
<i>Colletes (Colletes) succinctus</i>		insect - hymenopteran	31/12/1979	17/08/2007	19
<i>Epeolus cruciger</i>		insect - hymenopteran	21/08/1974	17/08/2007	15
<i>Epeolus variegatus</i>		insect - hymenopteran	09/07/1990	09/07/1994	2
<i>Ceratina (Euceratina) cyanea</i>	Blue Carpenter Bee	insect - hymenopteran	14/08/1984	14/07/1990	4
<i>Andrena (Simandrena) dorsata</i>		insect - hymenopteran	15/07/1984	10/05/1998	18
<i>Andrena (Leucandrena) barbilabris</i>		insect - hymenopteran	17/05/1980	31/12/1989	3
<i>Andrena (Melandrena) nitida</i>		insect - hymenopteran	31/12/1993	10/05/1998	2
<i>Andrena (Micrandrena) minutula</i>		insect - hymenopteran	14/08/1981	09/07/1994	14
<i>Andrena (Micrandrena) semilaevis</i>		insect - hymenopteran	07/06/1982	06/07/1982	2
<i>Andrena (Micrandrena) subopaca</i>		insect - hymenopteran	09/07/1984	-	2
<i>Andrena (Oreomelissa) coitana</i>		insect - hymenopteran	19/07/1982	31/12/1989	5
<i>Andrena (Plastandrena) bimaculata</i>		insect - hymenopteran	14/08/1982	-	2
<i>Andrena (Poliandrena) florea</i>		insect - hymenopteran	17/07/1982	31/12/1993	6
<i>Bombus (Megabombus) hortorum</i>	Small Garden Bumble Bee	insect - hymenopteran	17/07/1983	16/06/1985	3
<i>Andrena (Simandrena) congruens</i>		insect - hymenopteran	11/08/1981	31/12/1989	13
<i>Lasioglossum (Evylaeus) pauxillum</i>		insect - hymenopteran	10/05/1998	-	1
<i>Andrena (Taeniandrena) ovatula</i>		insect - hymenopteran	17/05/1980	10/05/1998	11
<i>Andrena (Taeniandrena) wilkella</i>		insect - hymenopteran	31/05/1975	13/06/2007	9
<i>Andrena (Trachandrena) haemorrhhoa</i>	Early Mining Bee	insect - hymenopteran	31/12/1989	-	1
<i>Andrena (Zonandrena) flavipes</i>	Yellow Legged Mining Bee	insect - hymenopteran	08/08/1982	07/09/2003	6
<i>Anthidium (Anthidium) manicatum</i>	Wool-Carder Bee	insect - hymenopteran	31/12/1989	-	1
<i>Anthophora (Clisodon) furcata</i>	Fork Tailed Flower Bee	insect - hymenopteran	03/08/1897	07/09/2003	4
<i>Anthophora (Heliophila) bimaculata</i>		insect - hymenopteran	31/12/1979	30/07/2014	9
<i>Apis mellifera</i>	Honey Bee	insect - hymenopteran	08/09/1985	31/05/2012	2
<i>Bombus (Psithyrus)</i>	Cuckoo bee	insect - hymenopteran	28/06/2010	-	1
<i>Andrena (Ptilandrena) angustior</i>		insect - hymenopteran	31/12/1989	-	1
<i>Ectemnius (Hypocrabro) continuus</i>		insect - hymenopteran	19/07/1982	09/07/1994	11
<i>Diodontus insidiosus</i>		insect - hymenopteran	11/08/1981	09/06/2007	4
<i>Mimesa equestris</i>		insect - hymenopteran	11/08/1981	17/08/2007	19
<i>Nomada goodeniana</i>	Gooden's Nomad Bee	insect - hymenopteran	31/05/1975	10/05/1998	6
<i>Mellinus arvensis</i>	Field Digger Wasp	insect - hymenopteran	21/08/1974	16/07/2009	15
<i>Lindenius panzeri</i>		insect - hymenopteran	19/07/1982	07/09/2003	5
<i>Lindenius albilabris</i>		insect - hymenopteran	11/08/1981	31/12/1989	7
<i>Harpactus tumidus</i>		insect - hymenopteran	27/06/1982	11/08/1982	3
<i>Gorytes quadrifasciatus</i>	4-Banded Digger Wasp	insect - hymenopteran	31/07/1985	17/08/1985	2
<i>Mimumesa dahlbomi</i>		insect - hymenopteran	19/07/1982	31/08/1996	8
<i>Ectemnius (Metacrabro) cephalotes</i>		insect - hymenopteran	17/08/1981	31/12/1989	5
<i>Mimumesa littoralis</i>		insect - hymenopteran	31/08/1996	-	1
<i>Ectemnius (Ectemnius) dives</i>		insect - hymenopteran	01/08/1984	31/12/1989	2
<i>Ectemnius (Ectemnius) borealis</i>		insect - hymenopteran	19/07/1982	28/08/1998	8
<i>Ectemnius (Clytochrysus) sexcinctus</i>		insect - hymenopteran	31/12/1989	-	1
<i>Ectemnius (Clytochrysus) ruficornis</i>		insect - hymenopteran	19/07/1982	31/12/1993	6

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<i>Ectemnius (Clytochrysus) lapidarius</i>		insect - hymenopteran	17/08/1981	31/12/1989	5
<i>Ectemnius (Clytochrysus) cavifrons</i>		insect - hymenopteran	19/07/1982	31/12/1989	5
<i>Dryudella pinguis</i>		insect - hymenopteran	17/06/2003	07/09/2003	2
<i>Diodontus minutus</i>	Minute Black Wasp	insect - hymenopteran	12/08/1984	18/08/1993	3
<i>Diodontus luperus</i>		insect - hymenopteran	12/08/1995	-	1
<i>Ectemnius (Metacrabro) lituratus</i>		insect - hymenopteran	27/06/1982	02/08/1997	11
<i>Halictus (Halictus) rubicundus</i>		insect - hymenopteran	31/05/1975	09/07/1990	5
<i>Tachysphex pompiliformis</i>		insect - hymenopteran	09/07/1994	13/06/2007	4
<i>Tachysphex nitidus</i>		insect - hymenopteran	17/06/2003	07/09/2003	2
<i>Spilomena troglodytes</i>		insect - hymenopteran	26/08/1984	-	1
<i>Rhopalum (Rhopalum) clavipes</i>		insect - hymenopteran	31/12/1993	-	1
<i>Psenulus schencki</i>		insect - hymenopteran	28/06/1984	-	1
<i>Psenulus pallipes</i>	Pale Footed Black Wasp	insect - hymenopteran	06/07/1982	14/07/1990	5
<i>Psenulus concolor</i>		insect - hymenopteran	14/08/1981	-	1
<i>Philanthus triangulum</i>	Bee Wolf	insect - hymenopteran	18/08/1993	10/07/2011	11
<i>Lasioglossum (Evylaeus) nitidiusculum</i>	Neat Mining Bee	insect - hymenopteran	13/05/1979	-	1
<i>Pemphredon (Cemonus) lethifera</i>	Little Black Wasp	insect - hymenopteran	14/08/1981	14/07/1990	4
<i>Mimesa bruxellensis</i>		insect - hymenopteran	14/08/1981	31/12/1989	2
<i>Passaloecus turionum</i>		insect - hymenopteran	26/08/1984	-	1
<i>Passaloecus gracilis</i>		insect - hymenopteran	23/06/1984	26/08/1984	6
<i>Passaloecus eremita</i>		insect - hymenopteran	06/07/1982	07/09/2003	4
<i>Passaloecus corniger</i>	Horned Black Wasp	insect - hymenopteran	31/07/1984	-	1
<i>Oxybelus uniglumis</i>	Common Spiny Digger Wasp	insect - hymenopteran	21/08/1974	04/08/2007	13
<i>Oxybelus mandibularis</i>	Pale Jawed Spiny Digger Wasp	insect - hymenopteran	06/07/1982	01/08/1984	5
<i>Miscophus concolor</i>		insect - hymenopteran	24/08/1974	07/09/2003	5
<i>Mimumesa unicolor</i>		insect - hymenopteran	21/08/1996	-	1
<i>Mimumesa spooneri</i>		insect - hymenopteran	17/08/1981	31/12/1989	4
<i>Pemphredon (Pemphredon) lugubris</i>	Mournful Wasp	insect - hymenopteran	15/07/1980	28/08/1998	3
<i>Sphecodes geoffrellus</i>		insect - hymenopteran	14/08/1982	09/07/1994	5
<i>Elampus panzeri</i>		insect - hymenopteran	31/07/1985	13/06/2007	6
<i>Cleptes nitidulus</i>		insect - hymenopteran	01/08/1984	31/12/1989	2
<i>Chrysis impressa</i>		insect - hymenopteran	06/07/1982	31/12/1989	4
<i>Chrysis illigeri</i>		insect - hymenopteran	31/12/1989	-	1
<i>Chrysis gracillima</i>		insect - hymenopteran	26/07/1984	26/08/1984	2
<i>Chrysis angustula</i>		insect - hymenopteran	31/07/1984	31/12/1989	4
<i>Sphecodes reticulatus</i>		insect - hymenopteran	10/09/1987	31/12/1989	2
<i>Sphecodes pellucidus</i>		insect - hymenopteran	28/07/1983	13/06/2007	8
<i>Hedychridium ardens</i>		insect - hymenopteran	11/08/1982	13/06/2007	3
<i>Sphecodes gibbus</i>		insect - hymenopteran	17/05/1980	10/05/1998	3
<i>Nomada rufipes</i>	Golden-Rod Nomad Bee	insect - hymenopteran	21/08/1974	17/08/2007	17
<i>Sphecodes ephippius</i>		insect - hymenopteran	31/12/1989	06/07/2008	9
<i>Sphecodes crassus</i>		insect - hymenopteran	26/08/1984	17/08/2007	3
<i>Panurgus calcaratus</i>		insect - hymenopteran	17/07/1983	09/07/1990	2
<i>Panurgus banksianus</i>		insect - hymenopteran	02/06/1982	07/07/1983	2

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<i>Osmia (Chalcosmia) caerulea</i>	Blue Mason Bee	insect - hymenopteran	31/12/1989	-	1
<i>Nomada striata</i>		insect - hymenopteran	08/06/2007	13/06/2007	3
<i>Crossocerus (Hoplocrabro) quadrimaculatus</i>	4-Spotted Digger Wasp	insect - hymenopteran	25/06/1984	17/08/2007	8
<i>Nomada marshamella</i>	Marsham's Nomad Bee	insect - hymenopteran	16/06/1984	-	1
<i>Mimesa lutaria</i>		insect - hymenopteran	11/08/1981	13/06/2007	7
<i>Sphecodes monilicornis</i>		insect - hymenopteran	31/07/1984	05/06/2013	4
<i>Crossocerus (Ablepharipus) podagricus</i>		insect - hymenopteran	19/07/1982	31/07/1985	2
<i>Hedychridium roseum</i>		insect - hymenopteran	11/08/1981	10/07/2011	9
<i>Nomada leucophthalma</i>		insect - hymenopteran	31/12/1993	-	1
<i>Crossocerus (Crossocerus) tarsatus</i>		insect - hymenopteran	31/12/1989	-	1
<i>Crossocerus (Crossocerus) pusillus</i>		insect - hymenopteran	24/08/1974	07/09/2003	10
<i>Crossocerus (Crossocerus) ovalis</i>		insect - hymenopteran	21/08/1974	31/12/1989	4
<i>Crossocerus (Crossocerus) elongatulus</i>	Slender Digger Wasp	insect - hymenopteran	26/08/1984	-	1
<i>Crossocerus (Blepharipus) walkeri</i>		insect - hymenopteran	26/07/1984	-	1
<i>Crossocerus (Blepharipus) nigrinus</i>		insect - hymenopteran	14/08/1981	31/12/1989	2
<i>Crossocerus (Blepharipus) megacephalus</i>		insect - hymenopteran	21/08/1996	31/08/1996	3
<i>Crossocerus (Blepharipus) annulipes</i>		insect - hymenopteran	31/12/1989	14/07/1990	2
<i>Crossocerus (Crossocerus) wesmaeli</i>	Wesmael's Digger Wasp	insect - hymenopteran	21/08/1974	17/08/2007	11
<i>Crabro scutellatus</i>		insect - hymenopteran	17/06/2003	07/09/2003	2
<i>Crabro peltarius</i>		insect - hymenopteran	22/06/1984	10/07/2011	4
<i>Cerceris rybyensis</i>	Ornate Tailed Digger Wasp	insect - hymenopteran	15/07/1984	17/08/2007	13
<i>Cerceris ruficornis</i>		insect - hymenopteran	21/08/1974	17/08/2007	17
<i>Cerceris arenaria</i>	Sand Tailed Digger Wasp	insect - hymenopteran	17/07/1976	16/07/2014	15
<i>Astata boops</i>		insect - hymenopteran	24/08/1974	04/08/2007	8
<i>Argogorytes mystaceus</i>	Field Digger Wasp	insect - hymenopteran	28/06/1984	-	1
<i>Cimbex femoratus</i>		insect - hymenopteran	10/06/2014	-	1
<i>Trichysis cyanea</i>		insect - hymenopteran	31/12/1989	17/08/2007	5
<i>Crossocerus (Blepharipus) cetratus</i>		insect - hymenopteran	11/08/1981	31/12/1989	4
<i>Lissotriton vulgaris</i>	Smooth Newt	amphibian	31/12/1975	-	1
<i>Bufo bufo</i>	Common Toad	amphibian	31/12/1975	13/09/2000	2
<i>Lissotriton helveticus</i>	Palmate Newt	amphibian	31/12/1975	-	1
<i>Rana temporaria</i>	Common Frog	amphibian	31/12/1975	22/02/2012	2
<i>Vipera berus</i>	Adder	reptile	31/12/1975	06/04/2012	15
<i>Zootoca vivipara</i>	Common Lizard	reptile	31/12/1975	16/05/2015	63
<i>Natrix natrix</i>	Grass Snake	reptile	31/12/1975	08/05/2011	6
<i>Anguis fragilis</i>	Slow-worm	reptile	31/12/1975	16/05/2015	65
<i>Muscardinus avellanarius</i>	Hazel Dormouse	terrestrial mammal	31/12/1975	-	1
<i>Oryctolagus cuniculus</i>	European Rabbit	terrestrial mammal	31/12/1975	31/08/1982	4
<i>Apodemus flavicollis</i>	Yellow-necked Mouse	terrestrial mammal	31/12/1975	-	1
<i>Apodemus sylvaticus</i>	Wood Mouse	terrestrial mammal	31/12/1975	-	1
<i>Arvicola amphibius</i>	European Water Vole	terrestrial mammal	31/12/1975	-	1
<i>Micromys minutus</i>	Harvest Mouse	terrestrial mammal	31/12/1975	31/03/2004	2
<i>Microtus agrestis</i>	Field Vole	terrestrial mammal	31/12/1975	-	1
<i>Mus musculus</i>	House Mouse	terrestrial mammal	31/12/1975	-	1

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<i>Rattus norvegicus</i>	Brown Rat	terrestrial mammal	31/12/1975	-	1
<i>Mustela erminea</i>	Stoat	terrestrial mammal	31/12/1975	-	1
<i>Sciurus carolinensis</i>	Eastern Grey Squirrel	terrestrial mammal	31/12/1975	-	6
<i>Lepus europaeus</i>	Brown Hare	terrestrial mammal	31/12/1975	-	3
<i>Myodes glareolus</i>	Bank Vole	terrestrial mammal	31/12/1975	-	3
<i>Pipistrellus pipistrellus</i>	Common Pipistrelle (45 kHz)	terrestrial mammal	19/08/2006	-	2
<i>Capreolus capreolus</i>	Roe Deer	terrestrial mammal	31/12/1975	31/12/1988	4
<i>Dama dama</i>	Fallow Deer	terrestrial mammal	31/12/1975	-	3
<i>Muntiacus reevesi</i>	Chinese Muntjac	terrestrial mammal	31/12/1975	-	1
<i>Vulpes vulpes</i>	Red Fox	terrestrial mammal	31/12/1975	31/08/1982	2
<i>Mustela nivalis</i>	Weasel	terrestrial mammal	31/12/1975	-	1
<i>Myotis</i>	Unidentified Bat	terrestrial mammal	18/08/2003	19/08/2006	2
<i>Neovison vison</i>	American Mink	terrestrial mammal	31/12/1975	-	2
<i>Pipistrellus</i>	Pipstrelle sp.	terrestrial mammal	31/12/1975	28/05/2005	6
<i>Talpa europaea</i>	European Mole	terrestrial mammal	31/12/1975	-	3
<i>Pipistrellus pygmaeus</i>	Soprano Pipstrelle (55 kHz)	terrestrial mammal	18/08/2003	-	2
<i>Plecotus auritus</i>	Brown Long-eared Bat	terrestrial mammal	31/12/1975	28/05/2005	2
<i>Erinaceus europaeus</i>	West European Hedgehog	terrestrial mammal	31/12/1975	-	3
<i>Neomys fodiens</i>	Eurasian Water Shrew	terrestrial mammal	31/12/1975	-	1
<i>Sorex araneus</i>	Eurasian Common Shrew	terrestrial mammal	31/12/1975	-	3
<i>Sorex minutus</i>	Eurasian Pygmy Shrew	terrestrial mammal	31/12/1975	-	1
<i>Myotis mystacinus</i>	Whiskered Bat	terrestrial mammal	31/12/1975	28/05/2005	2

MAP CITATION SHEETS

Sussex Biodiversity Record Centre

Woods Mill
Henfield
West Sussex
BN5 9SD



■ Sussex Biodiversity Record Centre is managed by the Sussex Wildlife Trust as a partnership project.
A list of our current funding partners can be found on our website: www.sxbrc.org.uk/about/partners

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VAT Registration No. 191 3059 69. Registered Office: Woods Mill, Henfield, West Sussex BN5 9SD.





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County Hall
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[Redacted]

By email only to mwdf@westsussex.gov.uk

Dear Sir or Madam

Soft Sand Review of the West Sussex Joint Minerals Local Plan Issues and Options Consultation (Regulation 18)

Thank you for your email of 21 January 2019 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.

Issues 1 and 2 (and therefore **Questions 1 and 2**) are largely beyond the remit of Historic England. In response to **Question 3**, Historic England is content that the scoping of the historic environment in the SA is appropriate.

Issue 3: Potential Sites and Site Selection. Question 4 – we are supportive of the site selection methodology and not the inclusion of the historic environment as one of the key criteria.

Question 5 – Potential Sites: Buncton Manor Farm and Chantry Lane sites would not raise any concerns in respect of designated heritage assets.

Cooper’s Moor – a scheduled bowl barrow on Lavington Common lies immediately to the west of the proposed Duncton Common site that may be impacted by the extension of the existing quarry (which itself contains the scheduled Duncton Common round barrow cemetery).

East of West Heath Common – a scheduled medieval moated site in Parlour |Copse to the south and two scheduled bowl barrows south of Wenham Cottage to the north-west of the proposed extraction site may be impacted in their setting by the quarrying of soft sand.

Ham Farm - the setting of the grade II listed Horsebrook Cottage, located just outside the proposed site to the north west, will potentially be impacted, and the Rectory and Round House listed buildings (both grade II) may be also affected by, e.g. noise, dust, traffic.

Minstead West – listed buildings in Minstead may be affected by additional traffic serving the proposed site.

Severals East & West – a number of listed buildings close to the boundaries of these sites may be affected by the operation of a quarry and associated traffic.

Questions 6, 7 and 9 – no comment.

Question 8 – we agree that the SA adequately scopes the historic environment issues relating to the selected sites.

Historic England would strongly advise that the Council’s own conservation advisers are closely involved throughout the preparation of the draft Plan, as they are often best placed to advise on local historic environment issues and priorities, sources of data (including the Historic Environment Record) and, consideration of the options relating to the historic environment locally.

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.

[Redacted]



[Redacted]



WEST SUSSEX SOFT SAND REVIEW: ISSUES AND OPTIONS

Please complete and return this form to Planning Services, West Sussex County Council, County Hall, Chichester, PO19 1RH by **18 March 2019**. Visit our website for further information: www.westsussex.gov.uk/mwdf.

Data Protection/Privacy: West Sussex County Council is registered as Data Controller(Reg. No. Z6413427). For further details and information about our Data Controller, please see www.westsussex.gov.uk/privacy-policy.

PART A: PERSONAL INFORMATION

A1. Personal Details

Name

Job Title (where relevant)

Organisation or affiliation (where relevant)

A2. Client Details (if applicable)

If you are completing this form on behalf of someone else then please provide details of the person(s) or organisation you represent.

Name

Job Title (where relevant)

Organisation or affiliation (where relevant)

A3. Contact Address Details

Please provide details of the person who should be contacted regarding this response

Address

Telephone

Email

Preferred Method of Contact

Post

Email

Please tick all categories below that most adequately describe you.

Resident

Parish/Town Council

SDNPA Member

Local Business

District/Borough Councillor

Government Organisation

Minerals or Waste Industry

County Councillor

Non-Government Organisation

Landowner

Local Authority

Other (please specify)

If you submit a consultation response, your contact details will be used to automatically notify you of updates with regards to the soft sand review and minerals and waste planning policy. Please tick the appropriate box if you **DO NOT** wish to be notified of the following.

Progress and consultation on the Soft Sand Review

Any further updates about Strategic Waste or Minerals Planning in West Sussex

PART B: ISSUE 1

Question 1A: Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

Please refer to attached response

Question 1B: Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

Please refer to attached response

Question 1C: Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Please refer to attached response

PART C: ISSUE 2

Question 2A: Do you consider that all 'reasonable alternatives' for soft sand supply have been identified or are there other options that we should be considering?

Please refer to attached response

Question 2B: Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Please refer to attached response

Question 2C: Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please refer to attached response

Question 3: Do you have any comments on the draft Sustainability Appraisal of the Options

Please refer to attached response

PART D: ISSUE 3

Question 4: Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Please refer to attached response

Question 5: Do you have any comments on the nine shortlisted sites identified in the Issues and Options Consultation Document?

Please tick all that apply and provide comments below.

- | | | | |
|--|--|--|--|
| <input checked="" type="checkbox"/> Buncton Manor Farm | <input checked="" type="checkbox"/> Chantry Lane | <input checked="" type="checkbox"/> Coopers Moor | <input checked="" type="checkbox"/> Duncton Common |
| <input type="checkbox"/> East of West Heath Common | <input checked="" type="checkbox"/> Ham Farm | <input checked="" type="checkbox"/> Minsted West | <input type="checkbox"/> Severals East |
| <input type="checkbox"/> Severals West | | | |

Please refer to attached response

Question 6: Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

Please refer to attached response

Question 7: Are there any sites that we should be considering that are not included in the Soft Sand Site Selection Report (4SR)?

Please refer to attached response

Question 8: Do you have any comments on the sustainability appraisal of the potential sites?

Please refer to attached response

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 sites?

Please refer to attached response

**WEST SUSSEX AND SOUTH DOWNS NATIONAL PARK AUTHORITY
JOINT MINERALS LOCAL PLAN**

**Single Issue Soft Sand Review
Issues & Options Consultation (Regulation 18)**

RESPONSES SUBMITTED ON BEHALF OF THE DUDMAN GROUP OF COMPANIES

MARCH 2019

QUESTION 1A

As stated, Planning Policy Guidance Minerals ("PPGM") states that the LAA should cover (amongst other things) a "*forecast of the demand for aggregate based on **BOTH** the rolling average 10-year sales data **AND** other relevant local information*" (PPGM Para 62)(emphasis added).

PPGM Para 64 states that the LAA "***MUST***...*consider other relevant information...rather than rely solely on past sales*" (emphasis added) and goes on to state that "*such information may include, for example, levels of planned construction and housebuilding*".

In preparing the LAA, the Authorities have taken into account those developments which constitute the main end-use of aggregate in order to reflect the "*other relevant local information*" element of the guidance. As stated, the main end-uses for aggregates are housing construction and the maintenance and construction of roads. Soft sand is identified as being largely used in housing construction. As such, the "*main assumption for soft sand demand*" made in the LAA is "*future planned housing*".

The projected growth in housing construction during the Plan Period as assumed in the LAA will be challenged in the response to QUESTION 1C.

In response to QUESTION 1A the correct demand scenario that the Authorities should use is **SCENARIO 2** the reason being that this includes the appropriate "*other relevant information*" as required by PPGM including the recognition that not all soft sand will be used in housebuilding.

That said, demand forecast **SCENARIO 3** would also be an acceptable forecast. By assuming that 100% of soft sand within the plan area is destined for use in housing construction it negates any inaccuracy or changes that may have occurred since 2011, being the year of sales on which the principal uses of primary aggregates were last analysed.

Demand forecast **SCENARIO 1** should be discounted as this is only based on the 10-year sales average and therefore does not comply with national policy guidance.

QUESTION 1B

Housebuilding can only be used as a partial guide to future demand as aggregates sales reflect much wider demands including refurbishment of the housing stock and infrastructure maintenance. It is important that other indicators of potential future growth in demand for aggregates are considered, for example:

- Local, regional and national economic forecasts. The Treasury publishes independent forecasts on potential growth. A range of organisations (National Institute of Economic and Social Research, OBR, PwC) publish GDP forecasts. Other indicators of potential economic activity include predicated Gross Value Added. The construction industry (CPA) and ONS produce forecasts of construction work and demand.
- Trends and forecasts of population change. Population projections will give an indication of possible household growth and wider overall demand.
- Planned major infrastructure projects or other indicators of significant change in demand for construction materials, within the LAA area and in adjoining authorities. Projects referred to in the National Infrastructure Delivery Plan 2016-2021 which are within about 30 miles of the Plan area should be taken into account. The LAA should also refer to any other schemes included in Local Economic Partnerships' Growth Deals and Strategic Economic Plans.
- Regional growth in housing. Whilst housing data has been used, the projected growth used of 26.8% only relates to an assessment of planned housing in West Sussex alone. Table B1 (Local Aggregate Assessment 2018, Appendix B) identifies increased housing growth in neighbouring counties and the "combined" average increase is stated as being 29.8%. Table 5 of the LAA attempts to quantify the level of exports of sand and gravel. Whilst confidentiality restrictions prevent a meaningful assessment, at the upper end of the estimates it is apparent that a significant tonnage could be being exported annually. Exports could therefore be expected to increase to reflect the projected increases in housing as projected in Table B1. It is unclear whether the demand forecasts take adequate account of possible increases in exports of soft sand.

QUESTION 1C

In short, the answer to this question is “yes”, the Authorities should plan for a different level of demand for soft sand than predicted under **SCENARIO 3**.

The **SCENARIO 3** level of demand is based on a projected increase in house construction of 26.8%. However, this percentage is based on an assumption that the number of additional dwellings that will be built per annum during the period 2018/19 to 2033/34 will be “flat”, that is, the same number of builds for each and every year. This is unlikely to be the case. The analysis needs to be more “sophisticated” and take into account those other factors referred to in the response to QUESTION 1B above.

For example, on examining economic factors alongside population changes then this data may impact on house build projections in the future. The additional data may point towards fewer or greater numbers of house builds but in either event it is important that all available data which would most likely influence housing construction numbers is considered.

Perhaps more importantly, the future projections used in arriving at the assumed growth in house construction of 26.8% appears to take no account of Central Government policies to increase the housing stock (or in the words of the National Planning Policy Framework, Paragraph 59 “*Government’s objective of significantly boosting the supply of homes*”). The Ministry of Housing, Communities and Local Government in its single departmental plan (May 2018) states that the Government will support the delivery of a million homes by the end of 2020 and half a million more by the end of 2022 with the aim to deliver on average 300,000 net additional homes a year.

Using figures of “net additional dwellings by local authority district” produced by Central Government, in general terms over the period 2008/09 to 2017/18 the West Sussex “share” of net additions was 1.88% of the total additions in England. As a percentage this has been relatively consistent over this period (low of 1.6%, high of 2.45%). The Government aims to increase annual additions to a figure of 300,000 per annum by the end of 2022. Assuming a “straight line” increase between 2017/18 actual (222,194 net additions in England) and achieving 300,000 in 2022/23 and assuming 300,000 new builds thereafter until 2033/34 then for the whole of England some 4,605,482 new homes would be built over the period 2018/19 to 2033/34. Applying a West Sussex “share” of 1.88% would mean an additional 86,583 homes in the County over the 16 year period 2018/19 to 2033/34 or (on average) an additional 5,411 new homes per annum.

The demand scenario’s in the LAA are based on an increase in dwellings being built from an average of 3,245 per annum having been built in West Sussex over the 10-year period 2008/09 to 2017/18. Assuming that this figure is accurate (it actually compares favourably with the Central Government figure of 3,124 for the same period), then when the Government’s aim for increasing the housing stock is factored in then the average annual percentage increase is 66.76% (increase from 3,245 per annum to 5,411 per annum). This is significantly higher than the 26.8% increase assumed in the LAA demand calculations. Applying an increase of 66.76% would result in a **SCENARIO 3** shortfall of, say, 4.6 million tonnes. In other words, the LAA **SCENARIO 3** demand forecast is too little by 1.76 million tonnes.

In summary, the demand forecast scenario's in the LAA which rely only on future growth in house building need to consider other influencing factors (see QUESTION 1B) but more importantly the assumptions made do not adequately take into account Central Government aims to increase housing stock. If these aims are met in full, then the demand for soft sand has been grossly under-estimated and over the plan period there will be an additional shortfall of 1.76 million tonnes.

It is worthwhile noting that both of the main political parties have objectives which are aimed at significantly increasing house building during the Plan Period.

QUESTION 2A

The 5 options considered by the Authorities which could be used to meet the identified shortfall for soft sand probably represent all of the “reasonable alternatives” that are available.

QUESTION 2B

Comments on the individual supply options are as follows.

Option A

Of the 9 “short listed” sites, only 2 sites lie wholly outside the National Park boundary. These sites have a combined reserve of 1.725 million tonnes. This reserve figure could reduce depending on how development might be designed to minimise any adverse environmental impacts. The 2 sites could contribute up to 61% of the LAA SCENARIO 3 shortfall. However, as commented in response to QUESTION 1C, the LAA shortfall is considered to be significantly under-estimated.

In addition, one of the two sites outside of the National Park is identified as being more constrained than the other when it comes to its RAG assessment.

It is unlikely that Option A is a viable supply option.

Option B

Option B allows for all of the “short listed” sites to be assessed on an equal basis, albeit those sites that lie within the National Park will be assessed taking account of relevant National Policy considerations, for example in terms of conserving and enhancing landscape and scenic beauty. The combined total reserves of all sites amounts to c 11 million tonnes. This is well in excess of the LAA SCENARIO 3 shortfall and similarly well in excess of the suggested shortfall as increased once increased future housing is factored in (refer to response to QUESTION 1C).

As a supply option, Option B offers an opportunity to make adequate provision for the shortfall whilst at the same time allowing for only those sites which have the least environmental impact to be developed.

Option C

The West Sussex Joint Minerals Local Plan as submitted for examination in May 2017 was criticised for proposing a supply option that relied heavily on making-up the shortfall of soft sand from other counties. The wording in the submitted document promoted a “move away” from minerals activity within the National Park and following the Examination in Public, the Planning Inspector stated that this was contrary to (the then) Paragraph 116 of the National Planning Policy Framework (now Paragraph 172 of the NPPF July 2018).

Further, as regards the soft sand supply proposals, the Inspector stated (Paragraph 30 of his report) that “*I consider the strategy to rely on imports from surrounding authorities and/or windfall development outside of the National Park, to provide a steady and adequate supply of soft sand and to meet the identified shortfall, to be unsound*”.

It is because of this conclusion that the Single Issue Soft Sand Review has had to be prepared.

It is unlikely, therefore, that a supply strategy which seeks to deal with the shortfall of soft sand solely by importing from areas outside of the County would be regarded as being “*positively prepared, justified, effective or consistent with national policy*”.

Option D

It is noted that the Authorities accept that “*there are currently no known viable equivalents to land-won building sand in the South East*” (Paragraph 3.20 of the Issues and Options Consultation (Reg 18)).

The potential for the use of marine-dredged material as a soft-sand substitute is minimal. The only UK source of marine-won soft sand is from a few areas where seabed material has been screened at sea to recover the stone and the less-coarse fraction has been left behind. The sand element which has been left, however, is still coarser in grain size than land-won sand and is “clean”, that is, it is naturally washed and contains no finer, silt particles, an essential component of mortar sand. Whilst this coarse sand can be “double processed” to produce finer grains within it, this not only increases costs of production but the final product still has limited uses and is not favoured over land-won soft sand by the construction industry.

Whilst marine-won sand is available from Belgium and Holland (river bed dredging) this sand has to be blended and has to have pigments and plasticisers added in order to produce mortar sand which is acceptable to the building industry. This sand has other issues associated with it such as a short “shelf life”, it must to be kept dry and so stored in silos and the colour of the mortar is very different to that produced using local, land-won sand. Overall the cost of these “engineered” mortars is around 4 times that produced using locally sourced, natural soft sand.

Contrary to what is stated at Paragraph 3.20 of the Issues and Options Consultation (Reg 18) document there is very little evidence that marine-dredged material landed at wharves in West Sussex is a “soft sand” and a like-for-like alternative to land-won soft sand.

There is no evidence to support the approach suggested that marine-dredged material “*may become more accessible and available over time, and an economically viable alternative to land-won soft sand extraction*”. There is no evidence to suggest that marine-dredged material would be accepted by the construction industry within the Plan Period. Option D is therefore not an appropriate supply option.

Option E

Realistically, this is the most appropriate supply option. It is likely that the majority of soft sand will be provided by way of supply Option B but this supply will be inevitably be supplemented by material being imported from neighbouring counties (Option C).

QUESTION 2C

Taking into account the comments made on QUESTION 2B it is evident that the preferred supply options are

(i) Option B as this offers an opportunity to make adequate provision for the shortfall whilst at the same time allowing for only those sites which have the least environmental impact to be developed and

(ii) Option E insofar as this allows material imported from neighbouring counties (Option C) to supplement the shortfall, but importation not being the sole supply option.

QUESTION 3

Option A

SA Objective 10

The draft score is identified as “red”. The justification does not take account of the fact that there are unlikely to be increases in activities as at sites which are extended there will be a continuation of existing activities whilst when new sites are proposed these are likely to be replacement sites for currently operational sites. That is, in either case, activities will not be cumulative (additional). The impact on the objective is therefore likely to be neutral.

SA Objective 13

The draft score is identified as “red”. The justification is incorrect when stating that “*allocated sites/areas of search that come forward will be likely to increase lorry traffic*”. At sites which are extended there will be a continuation of existing activities whilst when new sites are proposed these are likely to be replacement sites for currently operational sites. That is, in either case, traffic will not be not cumulative (additional). The impact on the objective is therefore likely to be neutral.

Option B

SA Objective 10

The draft score is identified as “red”. The justification does not take account of the fact that there are unlikely to be increases in activities as at sites which are extended there will be a continuation of existing activities whilst when new sites are proposed these are likely to be replacement sites for currently operational sites. That is, in either case, activities will not be cumulative (additional). The impact on the objective is therefore likely to be neutral.

SA Objective 13

The draft score is identified as “red”. The justification is incorrect when stating that “*allocated sites/areas of search that come forward could increase lorry traffic*”. At sites which are extended there will be a continuation of existing activities whilst when new sites are proposed these are likely to be replacement sites for currently operational sites. That is, in either case, traffic will not be not cumulative (additional). The impact on the objective is therefore likely to be neutral.

SA Objective 14

There is inconsistency between the score for Option A and Option B. In terms of greenhouse gases whilst circumstances are similar in both Options there is likely to be increased importation to meet the shortfall under Option A which would make an increase in greenhouse gas emissions from traffic more likely. Under Option B importation should be less and so any increase in emissions would be less.

Option C

SA Objective 1

The impact on health, well-being and amenity under this Option has been underscored. The impact on residents and visitors of the significantly increased levels of lorry traffic that would be required to supply the entirety of the identified shortfall has been under-valued. The reference to the use of marine dredged sand as a substitute which would help to lessen the impact is not appropriate. The Issues and Options Consultation (Reg 18) document itself recognises that “*there are currently no known viable equivalents to land-won building sand in the South East*” (Paragraph 3.20). The impact (and so the SA score) of supplying the shortfall entirely from areas outside of West Sussex should not be reduced on an assumption that at some point part of the shortfall will be met by marine dredged material.

SA Objective 2

The impact on recreational opportunities and access to the countryside has been underscored. The impact of what would be the significantly increased levels of lorry traffic that would be required to supply the entirety of the identified shortfall has been under-assessed.

SA Objective 3

The impact on the local economy of Option C has been underscored. To state in the justification that this option would have “*minimal effects on the local economy*” is incorrect. As existing operations close then there will be loss of jobs. New jobs would not be created within West Sussex to provide and import materials as suggested but at those quarries outside of the county from where the imported sand originates.

SA Objective 7

The protection and conservation of geodiversity has been underscored. Under this Option, geological features will not be exposed and so made available for learning opportunities.

SA Objective 14

The objective of reducing greenhouse gas emissions has been underscored. The significantly increased levels of lorry traffic that would be required to supply the entirety of the identified shortfall will significantly increase the potential for emissions.

Option D

The premise of Option D is itself flawed. The potential for the use of marine-dredged material as a soft-sand substitute is minimal. There is no evidence to support the approach suggested that marine-dredged material *“may become more accessible and available over time, and an economically viable alternative to land-won soft sand extraction”*. There is no evidence to suggest that marine-dredged material would be accepted by the construction industry within the Plan Period. Option D is therefore not an appropriate supply option. The low-scoring SA assessment therefore has little meaning, and is nothing more than a hypothetical exercise.

QUESTION 4

It is noted that the Authorities have relied on the same methodology as used when the Mineral Site Selection Report (January 2017) was prepared and which was submitted alongside the Joint Minerals Local Plan for examination. The comments subsequently made by the Planning Inspector are similarly noted when he stated that the methodology was "*robust and sound*". However, it is also noted that, as recognised by the Inspector, scores given under the various criteria are based on "*planning judgement*". This is inevitable but it is important to recognise that as a "subjective" measure, "planning judgement" can vary depending on the viewpoint of the person making the subjective judgement.

In addition, the subjective judgements being made at this stage are based on assumptions (particularly when it comes to the detail of how any site might be developed) and those assumptions could very easily change when it comes to considering the detail of how a site might be worked, what landscaping might be included and what other mitigation measures might be introduced. Therefore, the best that the traffic-light system can do is to "flag up" key issues/concerns which would need to be dealt with when considering the detail of a development proposal.

The fact that any criteria is flagged as being "red" at this stage is only as informative as the assumptions made in the assessment. If the key concerns/impacts flagged at this stage can be satisfactorily mitigated then in all probability the "traffic light colour" may change improving a sites "score".

In summary, whilst the site selection methodology used by the Authorities is an acceptable (and appropriate) approach this acceptance needs to be tempered by recognising that the approach is subjective and based on assumptions made at the time of the assessment. The "scoring" of sites based on the "traffic light system" serves to flag-up key issues/concerns and mitigation could result in an improvement to the red-amber-green ("RAG") score.

QUESTION 5

Comments on the “shortlisted” sites follow. In many respects, these comments “build on” comments made in response to QUESTION 4, particularly as regards subjectivity and the potential for mitigation to improve a site’s score.

Buncton Manor Farm

Buncton Manor Farm lies outside of the National Park and to the east of the existing quarry at Rock Common. The estimated gross soft sand reserve is in the order of 1 million tonnes, but it is important to note that this is an estimated yield from the whole site and does not represent the likely yield once detailed development is designed to take account of those issues identified in the RAG assessment.

Landscape and visual

Currently assessed as “red” on the RAG score assessment the impact is qualified by recognition that it is the eastern end of the whole site which is “*more likely to visually intrude*” and that there is “*potential to further limit views into the site*”.

Reference is also made to the “cumulative impact” of having this site opened-out at the same time as Rock Common is working. Account needs to be taken of the fact that the Rock Common site is coming to the end of sand extraction and will be entering into its restoration phase. Whilst there may be some overlap, this is not entirely necessary as Buncton Manor Farm could be timed to be developed once Rock Common is restored. Whilst this would mean that Buncton Manor Farm may not be developed until near the end of the Plan Period it nevertheless represents an important long-term, soft sand reserve.

The SDNPA Landscape Officer’s comments note that the site has “*potential*” to have a significant impact on views from sites within the National Park, although these are noted to be “*at distance within a wide panorama*”. The Landscape Officer accepts that “*woodland and hedgerow screening could be effective at reducing...impact*”. In practice, and given the likely timing of development of this site (so as to minimise cumulative impact) there would be ample opportunity for “advance planting” to mature and so provide effective screening by the time any extraction was to commence.

This is one of only two sites not inside the National Park and therefore positive consideration needs to be given to how landscape and visual impact might be dealt with. The starting point of the assessment should not be “there will be significant impact” rather a more detailed consideration of what area might be worked, what advance planting measures could be provided and so on is required.

Nature conservation, etc

Assessed as “amber”, detailed design of the development could adequately protect designated areas which lie close to the proposed site, for example appropriate stand-offs to ancient woodland, full ecological assessment of watercourses and so on.

Historic environment

Assessed as “amber” although as the assessment itself notes, development “*may cause moderate harm...in the absence of proportionate levels of mitigation*” (emphasis added). It would be reasonable to expect that any detailed development design would include measures to protect the historic environment.

The proposed RAG assessment is too high and should be “green/amber”.

Water environment

An “amber” assessment but this is based on no “adequate mitigation”. This mitigation would be part of a detailed development design.

Air quality

The site is not located within an Air Quality Management Area but the assessment states that in the absence of a routing agreement traffic may pass through a designated AQMA at Storrington. The subjective assessment has deemed this as an “amber” score although relatively straightforward controls could minimise issues relating to air quality.

The proposed RAG assessment is too high and should be “green/amber”.

Soil quality

Whilst the entire site is classified as Grade 3 soil quality whether this is Grade 3a or 3b quality has yet to be determined.

Under “key criteria” in the RAG assessment schedule, the soil quality is described as being “*potentially high quality*”. This is misleading and inaccurate as Grade 3 land is described as “good to moderate quality agricultural land” and so should be re-worded.

The proposed RAG assessment is too high and should be “green/amber”.

Public rights of way

No public rights of way either pass through or are directly adjacent to the site. Any visual impact from these could be adequately mitigated.

The proposed RAG assessment is too high and should be “green/amber”.

Transport and access

A further option not considered would be to route traffic by “internal road” to the existing Rock Common Quarry processing area and thereafter use the current access to the A24. Issues of visibility of the “internal road” would need to be assessed as part of the detailed design stage.

Services and utilities

The assessment raises a number of issues to do with the proximity of the site to the former Windmill Landfill site. These would be readily resolvable as part of the detailed design of the development, mainly by agreeing appropriate safety margins between the former landfill and any mineral extraction.

Amenity

Whilst the “amenity issues” raised should not be under-estimated these are issues which arise for almost all such developments (noise, dust, light pollution) and there are tried and tested practices and procedures which can be employed in order to minimise any adverse impacts.

The proposed RAG assessment is too high and should be “amber”.

NOTE: As point of consistency, compare this “score” (red/amber) with the score for Chantry Lane Extension (green/amber). The same issues apply in both cases, issues which can be minimised but at Buncton Manor Farm these only have the potential to affect individual properties whereas Chantry Lane is situated on the edge of Storrington.

Cumulative impact

Further assessment needs to be made on the relationship between all of the sites referred to. In reality it is unlikely that all of these sites would be fully operational at the same time. The starting point for the RAG assessment has been to consider the absolute worst-case position, hence the relatively high score. It is noted that even with all sites operating at the same time the Transport Assessment suggested that “*the traffic impact is not likely to be severe*”.

Airport safeguarding

The RAG assessment states that “*the site is capable of being worked and restored in a way that minimises the risk of attracting birds*”.

On this basis then the proposed RAG assessment is too high and should be “green”.

Chantry Lane Extension

The proposed site is an extension to an existing, permitted quarry. The development proposal involves giving-up an area within the existing quarry which already has planning consent for mineral extraction in exchange for permission to develop the proposed extension. The area within the existing permission lies on the south-west boundary of the existing quarry and is an area of mature woodland.

Landscape and visual

Currently assessed as “red/amber” this appears to be on the basis more of the potential impact of the proposed new, site access than the extension area itself. There is the possibility of another route for the access which would access the A283 closer to Storrington, at Manley’s Hill. This would mean that the new access would be outside the National Park.

Nature conservation, etc

The “key criteria” section states that “*the site will not have an adverse effect on the Arun Valley SPA/Ramsar*” because of the way that water flow from the River Stor is managed.

The SSSI/RIGS comprises the open faces of the quarry and so will not be affected.

On this basis then the proposed RAG assessment is too high and should be “green”.

Historic environment

There is the possibility of archaeological remains within the site, although the quality of any interest is uncertain. An archaeological impact assessment would be required (desk-based assessment and field evaluation as necessary). Such investigations are not unusual and would be part of the routine detailed development design work.

The site owner is looking to undertake some preliminary archaeological work before the next stage of the Single Issue Soft Sand Review which will further inform the plan process.

Water environment

The site is stated as being “*appropriate*”.

On this basis then the proposed RAG assessment is too high and should be “green”.

Air quality

The site is located near to the designated AQMA at Storrington. However, it would be proposed that traffic be routed away from Storrington (as referred to in the “Transport and access” section of the RAG assessment) with all traffic turning right out of the site and left into the site. This would be regulated by way of a routing agreement.

The proposed RAG assessment is therefore too high and should be “green/amber”.

Soil quality

Reference is made to Grades 2 and Grade 4 agricultural land. The presence of Grade 2 land is questioned and this may be an error and the reference should be to Grade 3 land. This will be further investigated by the site owner before the next stage of the Single Issue Soft Sand Review.

The proposed RAG assessment is too high and should be “green/amber”.

Public rights of way

No comments.

Transport and access

The Transport Assessment (2015) states that subject to mitigating any impact on traffic during the peak hour congestion periods then the proposed access would be acceptable. There are no issues identified as regards additional highway improvements.

The proposed RAG assessment is therefore too high and should be “green/amber”.

Services and utilities

The site owner is reviewing the easement/wayleave agreements relating to services and utilities to establish whether these include a “lift and shift” clause.

In any event, it is noted that the water infrastructure referred to is “*close to the site*” and therefore this may be avoided at the detailed development design stage.

The proposed RAG assessment is too high and should be “green/amber”.

Amenity

No comments.

Cumulative impact

The proposed site is an extension to an existing, permitted sand pit. As previously indicated, the proposal includes an “exchange”, relinquishing the right to work a permitted area. The continuation of extraction for a longer period is, therefore, not excessive.

The proposed RAG assessment is too high and should be “green/amber”.

Airport safeguarding

No comments.

Coopers Moor

This site lies immediately to the south of the existing Heath End Quarry separated by Duncton Common Road. This site would be worked as an extension to Heath End Quarry making use of the existing infrastructure (processing plant, access and so on).

Landscape and visual

The site is predominantly mature woodland and at the point of producing a detailed development design best use would be made of existing woodland to minimise any visual impact.

The woodland on this parcel of land suffered severe windblow in the 1987 storm. The landowner's (Leconfield Estate) forestry management plan has allowed natural regeneration of birch, chestnut coppice and alder to provide a short term commercial land use. The current crop will be used for sale into the firewood and biomass markets. It is important to note (and to be aware) that the trees will be felled within the next ten years as part of the Estate's agreed management plan with the Forestry Commission. Any impact on either habitat value or visual amenity derived from the presence of this area of woodland could, therefore, occur irrespective of future sand extraction from this site.

There are opportunities as part of the restoration of this site to enhance habitat value. Restoration of this site will be consistent with, and complement, that already approved for the adjoining Heath End Quarry.

Nature conservation, etc

As noted above, the woodland is included within the landowner's agreed woodland management plan with the Forestry Commission which will see the trees felled within the next ten years.

Historic environment

Any impact on the setting of listed buildings will be minimised at the detailed development design stage primarily through the retention of woodland around the perimeter of the site with additional, supplemental planting as necessary.

The setting of the Scheduled Monument referred to is already compromised as this is located within the existing Heath End Quarry. Sand extraction from the Cooper Moor site would have little, additional adverse impact on the SAM.

It would be expected that prior to any development of the site then archaeological investigations would be undertaken.

As indicated above, the current woodland is a result of regeneration following the 1987 storm and therefore the reference to "early 19th-century" woodland is incorrect.

The proposed RAG assessment is too high and should be "amber".

Water environment

As the site is situated adjacent to the existing Heath End Quarry (a site which is “wet worked”) a great deal is known about groundwater behaviour in the area. An additional (small) area of “wet working” is unlikely to increase the risk of adversely impacting on drainage or flood risk.

Air quality

It is relevant to note that as this site would be worked as an extension to the existing Heath End Quarry, site traffic movements will not be in addition to those already associated with Heath End Quarry. Any impact on Air Quality Management Areas will, therefore, not be cumulative.

The proposed RAG assessment is too high and should be “green/amber”.

Soil quality

No comments.

Public rights of way

No comments.

Transport and access

No comments.

Services and utilities

The landowner has advised that there are no service or utilities that cross over the proposed site.

The detailed development design will take account of any services and utilities that may run along boundaries or otherwise in close proximity to the site.

The proposed RAG assessment is therefore too high and should be “green”.

Amenity

No comments.

NOTE: There appears to be a lack of consistency between amenity being scored at “green/amber” whilst the impact on the same receptors scores “red/amber” under historic environment.

Cumulative impact

Concerns are raised about the proposed extension delaying the restoration of Heath End Sandpit. A significant majority of the Heath End Quarry site would be fully restored in accordance with the existing planning permission by the time extraction at Coopers Moor was to commence. The processing plant area would remain operational as would the access (which is in any event shared with another business and so would remain following the final restoration of Heath End Quarry). The proposed site is an extension to Heath End Quarry and therefore there would be a short continuation of quarrying, not a development in addition to Heath End Quarry.

The proposed RAG assessment is too high and should be “green/amber”.

Airport safeguarding

No comments.

Duncton Common

This site lies immediately to the west of the existing Heath End Quarry. This site would be worked as an extension to Heath End Quarry making use of the existing infrastructure (processing plant, access and so on).

Landscape and visual

The site is predominantly mature, plantation commercial forestry and at the point of producing a detailed development design best use would be made of existing woodland to minimise visual impact.

It is important to note that this is a commercial woodland with some mature softwood crops, mainly Scots Pine with a small area of Norway Spruce and a few patches of birch regeneration following the 1987 storm. All trees are due to be felled within the next ten to twelve years in accordance with the landowner’s (Leconfield Estate) forestry management plan. Any impact on either habitat value or visual amenity derived from the presence of this area of woodland could, therefore, occur irrespective of future sand extraction from this site.

There are opportunities as part of the restoration of this site to enhance habitat and amenity value. Restoration of this site will be consistent with, and complement, that already approved for the adjoining Heath End Quarry.

Nature conservation, etc

The landowner advises that there is virtually no heathland within the proposed site area. The heathland areas are understood to be predominantly to the south and west of the site.

Further, the landowner advises that the Site of Nature Conservation Importance (SNCI) is not within the site area but lies to the south of the stream.

The above being the case, then the detailed development design could ensure that these off-site features are adequately protected.

Kilsham Copse (ancient woodland) is within the same ownership and would be protected through the provision of “a buffer”.

It is noted that the RAG assessment refers to the potential for harm to the Arun Valley SPA/Ramsar. The assessment notes that there is a potential pathway for sediment to adversely impact the Arun Valley SPA/Ramsar. It should be pointed out that the Arun Valley SPA lies some 9km south-east of the site. The watercourse adjacent to the site drains into the River Rother (which lies 1km north of the site) which then meanders generally in an easterly direction for around 12km before joining the River Arun. The likelihood of sediment harming the Arun Valley SPA/Ramsar is remote. In any event, the provision of silt-traps and the prevention of suspended solids entering watercourses is common and standard practice.

The proposed RAG assessment is too high and should be “amber”.

Historic environment

Any impact on the setting of listed buildings will be minimised at the detailed development design stage primarily through the retention of woodland around the perimeter of the site with additional, supplemental planting as necessary.

The setting of the Scheduled Monument referred to is already compromised as this is located within the existing Heath End Quarry. Sand extraction from the Duncton Common site would have little, additional adverse impact on the SAM.

Prior to any development of the site then archaeological investigations would be undertaken.

The reference to application SDNP/111/14/CND is not appropriate or relevant and should be removed.

The proposed RAG assessment is too high and should be “amber”.

Water environment

Comment on the potential for sediment to impact on the Arun Valley SPA/Ramsar has been made above and the same comments apply.

As the site is situated adjacent to the existing Heath End Quarry (a site which is “wet worked”) a great deal is known about groundwater behaviour in the area. An additional area of “wet working” is unlikely to increase the risk of adversely impacting on drainage or flood risk.

Air quality

It is relevant to note that as this site would be worked as an extension to the existing Heath End Quarry, site traffic movements will not be in addition to those already associated with Heath End Quarry. Any impact on Air Quality Management Areas will, therefore, not be cumulative.

The proposed RAG assessment is too high and should be “green/amber”.

Soil quality

No comments.

Public rights of way

No comments.

Transport and access

No comments.

Services and utilities

The landowner has advised that there are no service or utilities that cross over the proposed site.

The detailed development design will take account of any services and utilities that may run along boundaries or otherwise in close proximity to the site.

The proposed RAG assessment is therefore too high and should be “green”.

Amenity

Whilst the “amenity issues” raised should not be under-estimated these are issues which arise for almost all such developments (noise, dust, light pollution) and there are tried and tested practices and procedures which can be employed in order to minimise any adverse impacts.

The proposed RAG assessment is too high and should be “green/amber”.

Cumulative impact

It is noted that the assessment states that there would be no additional impacts if working of this proposed site followed after completion of extraction from the adjoining, permitted Heath End Quarry. This would be the case.

The proposed RAG assessment is therefore too high and should be “green/amber”.

Airport safeguarding

No comments.

Ham Farm

The proposed Ham Farm site lies outside of the National Park. The estimated gross soft sand reserve is in the order of 750,000 tonnes. This is a greenfield, new site. It was previously identified as the only soft sand site allocation in the Joint Minerals Local Plan but was removed following the public examination and the subsequent Inspector's Report.

Landscape and visual

The site is not situated in the National Park. It is, however, immediately adjacent to the Park boundary which runs along the southern edge of the A283. Minimising impact on the general landscape and visually sensitive views would be considered during the detailed development design phase of the project. This would likely include the retention of existing perimeter trees and hedgerows plus supplementary advance planting.

Nature conservation, etc

No comments.

Historic environment

It is noted in the RAG assessment that there are a number of listed buildings in close proximity to the site. Many of these, however, are screened by existing, mature vegetation. Additional measures required to protect these buildings would be reviewed during the detailed development design.

A Historic Building Visual Impact Assessment will be undertaken before the next stage of the Single Issue Soft Sand Review which will further inform the plan process.

Regarding the potential for archaeological remains within the site, preliminary archaeological work will be undertaken before the next stage of the Single Issue Soft Sand Review which will further inform the plan process.

The proposed RAG assessment is too high and should be "amber".

Water environment

No comments.

Air quality

This site will likely “follow on” from sand extraction at Rock Common therefore traffic associated with this site will not be in addition to traffic from Rock Common. The impact on the AQMA at Storrington will therefore not be increased and may even be reduced depending on output.

The proposed RAG assessment is therefore too high and should be “green/amber”.

Soil quality

Whilst the entire site is classified as Grade 3 soil quality whether this is Grade 3a or 3b quality has yet to be determined. Under “key criteria” in the RAG assessment schedule, the soil quality is described as being “best and most versatile” which would only apply to Grade 3a soils..

The proposed RAG assessment is too high and should be “amber”.

Public rights of way

There is only one public footpath which is some 60 metres distance from the site. Measures required to minimise impact on users of this footpath will be incorporated during the detailed development design.

The proposed RAG assessment is too high and should be “green/amber”.

Transport and access

No comments.

Services and utilities

The site owner is reviewing the easement/wayleave relating to services and utilities to establish whether the agreements include a “lift and shift” clause.

In any event, the services/utilities referred to can be avoided at the detailed development design stage.

The proposed RAG assessment is too high and should be “green/amber”.

Amenity

Whilst the “amenity issues” raised should not be under-estimated these are issues which arise for almost all such developments (noise, dust, light pollution) and there are tried and tested practices and procedures which can be employed in order to minimise any adverse impacts.

The proposed RAG assessment is too high and should be “amber”.

Cumulative impact

No comments.

Airport safeguarding

In common with the RAG assessment for Buncton Manor Farm this assessment should state that “the site is capable of being worked and restored in a way that minimises the risk of attracting birds”.

On this basis then the proposed RAG assessment is too high and should be “green”.

Minsted West

This site is an extension to the existing, permitted Minsted Quarry.

Landscape and visual

The assessment recognises that existing woodland and forestry limit visibility of the site itself. The assessment refers to the “close proximity” of a Local Nature Reserve, but in context the LNR lies to the north of the existing Minsted Quarry, and so north of the body of water which remains following the wet working of the existing quarry.

Restoration of the site would be consistent with the restoration approved for the existing quarry and would overall seek to enhance habitat and landscape.

Nature conservation, etc

It is noted that the assessment confirms that the development of this site would not have any impact on either the Singleton and Cocking Tunnel SAC or the Arun Valley SPA/Ramsar.

Any impacts on Steham Common SNCI and Iping Common SSSI would be assessed and appropriate mitigation provided as part of the detailed development design.

However, insofar as the proposed site will be an extension to the existing Minsted Quarry, the extension of the area of open water is likely to have minimal additional impact on these designated areas.

The proposed RAG assessment is too high and should be “amber”.

Historic environment

As regards the potential for archaeological remains within the site, preliminary archaeological work will be undertaken before the next stage of the Single Issue Soft Sand Review which will further inform the plan process.

It is noted in the RAG assessment that there are a number of listed buildings in close proximity to the site. Many of these, however, are screened by existing, mature vegetation. Additional measures required to protect these buildings would be incorporated during the detailed development design,

A Historic Building Visual Impact Assessment will be undertaken before the next stage of the Single Issue Soft Sand Review which will further inform the plan process.

Water environment

The assessment under the heading “water environment” conflicts with the wording under the heading “nature conservation”. Under the latter heading it is noted that there would be no harm due to sediment to the Arun Valley SPA/Ramsar. The wording under the “water environment” heading which refers to the “potential pathway for sediment impacts” should, therefore, be removed.

The requirement for a risk assessment of the water environment is noted and the provision of additional details on hydrology and hydrogeology will be provided before the next stage of the Single Issue Soft Sand Review.

Air quality

It is relevant to note that as this site would be worked as an extension to the existing Minsted Quarry, site traffic movements will not be in addition to those already associated with Minsted Quarry. Any impact on Air Quality Management Areas will, therefore, not be cumulative.

The proposed RAG assessment is too high and should be “green/amber”.

Soil quality

No comments.

Public rights of way

It is likely that Bridleway 907 may need to be diverted. Proposals will be considered during the detailed development design phase.

Transport and access

No comments.

Services and utilities

The site owner is reviewing the easement/wayleave agreements relating to services and utilities to establish whether these include “lift and shift” clauses.

In any event, the services/utilities referred to can be avoided at the detailed development design stage.

The proposed RAG assessment is too high and should be “green/amber”.

Amenity

Whilst the “amenity issues” raised should not be under-estimated these are issues which arise for almost all such developments (noise, dust, light pollution) and there are tried and tested practices and procedures which can be employed in order to minimise any adverse impacts.

Cumulative impact

The only impact would be the continuation of existing operations over an extended period.

The proposed RAG assessment is too high and should be “green/amber”.

Airport safeguarding

No comments.

QUESTION 6

No comments.

QUESTION 7

No comments.

QUESTION 8

Whilst couched in slightly different terms within the draft Sustainability Appraisal many of these matters have been commented on in responses to QUESTION 5 and so will not be repeated here.

QUESTION 9

It is noted that the guiding principles set-out in Paragraph 4.9 of the Regulation 18 Consultation Document do not exactly mirror those as found at Paragraph 7.1.6 of the adopted Joint Minerals Local Plan (July 2018). The guiding principles for the selection of soft sand sites have been based on those found in the JMLP but care will need to be taken to avoid confusion between the two sets of “principles” particularly where there is any divergence.

The additional guiding principle which is proposed, that is “a preference for extensions to existing sites rather than new sites, subject to cumulative impact assessments” is SUPPORTED.



By email only

mwdf@westsussex.gov.uk

West Sussex Joint Minerals Local Plan

Single Issue Soft Sand Review – Issues & Options Consultation (Reg. 18) – January 2019

The following comments are made on behalf of the Sussex Wildlife Trust (SWT) and are based on the documents available on the West Sussex County Council (WSCC) website¹

The excavation of minerals can have significant adverse impacts on biodiversity, both directly through loss and degradation of habitats and indirectly through impacts on the water table, air quality and carbon emissions for example. There are also opportunities for measurable net gains to biodiversity through appropriate management of mineral extraction site and restoration and aftercare. However, given that climate change is the biggest threat impacting biodiversity and that mineral extraction (and subsequent use of these minerals) contributes to this process, it is SWT position that the most environmentally sustainable approach would be a move away from any extraction of new minerals.

Given this position, we have examined the Issues & Options Consultation in terms of the evidence of need for new sites and the potential impact of the options and site selection on biodiversity.

Question 1A: Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

It is for the Authorities to set out their reasoning for the soft sand demand scenario chosen along with a sound evidence base for this conclusion, including an assessment of the sustainability of this choice. As it stands, SWT does not believe this has been provided. In particular, there is no clear explanation why the highest demand scenario should be used, although this is what is indicated through paragraph 6.1.5 and 6.1.6 of the Sustainability Appraisal (SA).

The method of predict and provide is unsustainable when considering the finite nature of the resource of soft sand. Additionally there appears to have been no formal assessment of this issue in the SA (please see our comments on Question 3 below).

SWT disputes the accuracy of the Authorities demand scenario calculations. We believe these are flawed and therefore result in an overestimation of the requirement. The correlation between the expected uplift in construction of houses and therefore an increase in need of soft sand is set out in Appendix B of the Local Aggregates Assessment (LAA). SWT is concerned that there is an assumption that the uses of primary aggregates in 2011 remain at the same level in 2019 and into the future. There appears to be no

¹ <https://www.westsussex.gov.uk/about-the-council/policies-and-reports/environment-planning-and-waste-policy-and-reports/minerals-and-waste-policy>



consideration in changes in building practices and in particular the use of alternatives to brick and mortar such as modular housing and timber cladding.

Additionally, whilst we agree that there is a link between housing completions and aggregate sales (paragraph 2.1.4, LAA), it is not clear that the correlation should be 1:1 in terms of percentages. For example, whilst housing completions increased by 50% in 2015/16, land won sand and gravel sales only increased by 32% between 2012 and 2016. Paragraph 2.1.5 of the LAA admits that it is not a perfect correlation and this is further demonstrated in Figure 1. However, the soft sand demand forecasts in Table 4 use a simple calculation of increasing the 10 year average by the assumed increase in house building. Given that soft sand sales have not increased by the same percentage as house sales in the past, this does not seem logical.

Mineral extraction is considered to be a major development and paragraph 172 of the National Planning Policy Framework (NPPF) states that '*planning permission should be refused for major development [within National Parks] other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest*'. SWT understands that this 'exceptional circumstances' test needs to be applied at the application stage. However, in order to be sound, a development plan must be effective and justified i.e. there must be some expectation that a site allocated within a local plan has a good chance of achieving planning permission. Therefore, SWT cannot see how sites within the South Downs National Park (SDNP) can potentially be taken forward for allocation without consideration of this test.

A fundamental element of this decision is the need for the new site in terms of the 'adequate and steady supply of minerals' expected through the NPPF. A demand scenario based on very loose assumptions with no consideration of changes in building techniques does not seem adequate. There should be a much more detailed assessment of future need before there is consideration of allocating new sites in the SDNP. It needs to be noted that National Parks are designated because of their special qualities on a National scale. It would therefore not be appropriate to balance the negative impacts on a nationally designated landscape in terms of local need only.

Question 1B: Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

Paragraph 2.1 of the consultation document states that demand for aggregates is based on both the rolling average 10 year sales data and other relevant local information. However, it is not clear to SWT what other information has been considered by the Authorities. For example, there seems to be an assumption that the number of dwellings forecast for the next 15 years in West Sussex provide an increased need for soft sand (for mortar) on a 1:1 basis. However, the correlation between these two factors is not clear. Additionally there appears to have been no analysis done of the types of dwellings being built or what this might be in the future. There is clear need to reduce the whole-life carbon impact of new homes² and we are already seeing a wider variety of building methods being used³.

Similarly, the British Geological Survey's UK Minerals Yearbook 2015 shows a steady decline in Britain's consumption of sand since the early 1990's resulting in the UK being a net exporter every year. This fits with the data provided by the LAA demonstrating that West Sussex is also a net exporter when it comes to soft sand. This loss of resource needs to be considered further as although the SA appears to consider the environmental impacts of the Authorities importing materials, there is little consideration of the impact of exports on neighbouring authorities.

Paragraph 2.2.9 of the LAA demonstrates very little understanding of the use of marine won sand for mortar. This should be more thoroughly investigated given the 'exceptional circumstances' test for allowing mineral extraction in a national park (discussed in Question 1A).

² <https://www.theccc.org.uk/publication/uk-housing-fit-for-the-future/>

³ <https://www.lewes-eastbourne.gov.uk/lewes-district-council-news/three-of-the-six-new-modular-homes-in-ashington-gardens-in-peacehaven-were-craned-into-position-this-week/>

In general, there needs to be far more consideration of the need to reduce demand by using both recycled and other types of construction material, the use of alternative sources such as marine won sand and the ability of neighbouring authorities to meet their own need rather than import from West Sussex.

Additionally, any 'other relevant local information' considered by the Authorities needs to be set out in a clear and transparent manner. It is not clear from paragraph 1.2.3 of the LAA what 'other relevant local information' has actually been included.

Question 1C: Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

SWT fundamentally questions the validity of the 'predict and provide' approach adopted by the authorities. As mentioned in our comments to Questions 1A and 1B we believe the demand scenarios have been overestimated and do not take into account likely changes in future demand through changes in building techniques for example.

Additionally, given that the SDNP is a national designation, the Authorities should consider the need for soft sand on a national scale. In particular, there is no explanation as to why the soft sand currently being produced in West Sussex is not prioritised for use in the county. SWT cannot see how 'exceptional circumstances' of local need could be argued if much of the soft sand being won is exported out of county or even the country.

Question 2A: Do you consider that all 'reasonable alternatives' for soft sand supply have been identified or are there other options that we should be considering?

It is almost impossible to consider 'reasonable alternatives' when there is no accurate calculation of demand or existing supplies. Due to supposed confidentiality, the estimated reserve at existing site is widely estimated. Additionally, it is not clear if Table 6 in the LAA includes all permitted sand and gravel quarries as Minsted Quarry, which is adjacent to the SWT nature reserve of Iping and Stedham Commons is missing. If there are dormant sites in existence that still have reserves, this needs to be taken into account.

Furthermore, the information on reserves provided by existing sites should be put forward in a consistent and transparent way. As the Authorities are aware, the current quarry at Minsted is suspended due to the operator's failure to provide sufficient information for the SDNPA to undertake a ROMP. To SWT's knowledge this site has not been worked for a number of years, with the operator claiming the sandpit would be exhausted by the mid 2000's. However, as part of the ROMP, they are now claiming that further reserves remain. SWT has not been allowed to see the evidence of further reserves to date which makes it very hard for us to accept the reliability of the data.

As stated in our response to Question 3, it is not clear to us what 'reasonable alternatives' have actually been considered in the SA. In particular there seems to be no consideration of recycled alternatives and the information on marine won soft sand is extremely vague.

Question 2B: Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

As mentioned in previous comments, any consideration of Option B must include consideration of the 'exceptional circumstances' test. It would be completely inappropriate to allocate a site within the SDNP that is unlikely to get planning permission due to the requirements of policies M13(c) of the JMLP and SD1, SD2 and SD3 of the emerging South Downs Local Plan. Additionally, SWT does not believe that a robust case has been made for the shortfall proposed in the consultation document or that this needs to be met through new allocations within the SDNP.

As stated previously, further information must be provided on the reality of Option D. As it stands, the information in the various evidence documents is very vague.

Question 2C: Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

No option should be taken forward until a more accurate forecasts of both demand and existing reserves has been made. Once this is done, any identified shortfall should be met through the most sustainable options including use of recycled materials.

SWT's priority is consideration of adverse impacts on biodiversity and therefore any decision over new site allocations should be based upon up to date ecological information. Given the concentration of sand resource within the Greensand Heaths, we are particularly concerned that new quarrying within the SDNP is likely to impact negatively on rare heathland and ancient woodland habitat.

Question 3: Do you have any comments on the draft Sustainability Appraisal of the Options

There seems to be a fundamental formatting issues with many of the tables within the Sustainability Appraisal (SA) whereby some of the content is missing/half shown. This has had a significant impact on SWT's ability to assess the suitability of the SA process and its conclusions.

For example, much of the decision-making criteria in Appendix 3 is missing. It is hard to give an opinion on the SA's assessment of options/sites against the sustainability objective '*To protect, conserve and more likely to have a significant negative effect on designated landscapes, local enhance biodiversity including natural habitats and protected species*' when the score justification is not legible.

Given the significant amount of information that is missing from the SA, it does not seem appropriate for the Authorities to jump straight to a Regulation 19 consultation on matters of soundness and legal compliance only. SWT requests that another Regulation 18 consultation is run once all the site assessment information has been gathered, such as the assessment of ecosystem services mentioned in paragraph 3.27 of the 4SR, and the SA is reformatted.

The part of the SA covering stage B (paragraphs 2.2.11 to 2.2.21) seems to be about the JMLP rather than the soft sand review. SWT is unclear what reasonable alternatives have been/will be considered for the soft sand review.

SWT disagrees with the inconsistent application of assumptions in Table 3.2. In particular, the likely evolution of the environment in the absence of the JMLP/SIR for 11 of the 12 sustainability issues includes an assumption that minerals development will still go ahead, albeit potentially inappropriately and with less stringent mitigation. However for the second sustainability issues, 'Lower employment levels', the assumption is that employment in the minerals sector will decrease further, presumably because no minerals development is occurring? This is completely contradictory to all the other assessments.

We are pleased to see consideration of locally designated sites and priority habitat within the assessment for SA Objective 6 – To protect, conserve and enhance biodiversity including natural habitats and protected species. We are also encouraged by the consideration of ecosystem services in Table 5.2. However, this table seems restrictive in its classification and we would like to see it updated in the next iteration. For example, protecting soil quality is listed as benefiting regulating services, however soil formation is a natural process that is also a supporting service. Similarly, protecting Air Quality should be seen as a cultural service as well as regulating. These are just a few immediate issues, SWT would be happy to provide a more detailed analysis of this Table if requested.

SWT also question the statement in paragraph 6.1.6 of the SA. Looking at the Main SA report⁴ it is not clear where the assessment of Issue 1 can be found. Appendix 3 is a discussion of baseline data. Without this information, SWT really questions the assumption that planning for the highest demand scenario is acceptable in terms of sustainability. The Authorities should clearly set out why the highest demand scenario is reasonable and how this fits with the SA objectives given that the vast majority of potential soft sand sites sit in the SDNP.

It is also not clear why Appendix 3 only contains positive/uncertain and negative/uncertain criteria rather than criteria for issues where the results are not uncertain.

Question 4: Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

SWT is pleased to see that locally designated sites are included in the Site Assessment Framework (Appendix 2). Although it is not clear why locally designated sites and priority habitats are not listed as a consideration in Appendix 1 of the 4SR for Nature Conservation and Geodiversity.

SWT supports the statement in the Site Assessment Framework that there must be no harm or loss of ancient woodland. However we do not believe that this criteria has been accurately considered in some of the stage 3 site proformas (please see our comments on question 5). Additionally, whilst Ancient Woodland is specifically mentioned, there is no reference to other priority habitats. This is remiss, particularly given the responsibility of the SDNPA to conserve and enhance the rare heathland habitat found in many of the potential sites as per Purpose 1.

As stated on the SDNPA's website: '*Stretching between Petersfield and Storrington these heaths are among the rarest of all the habitats in the Downs, covering just one per cent.*' Given the Authorities duties under the NERC Act, the requirements of paragraph 174 of the NPPF and in particular the SDNPA's purposes, there must be a presumption against loss of any heathland habitat within West Sussex. There should be particular consideration of the work carried out to date through the Heathlands Reunited Project of which SDNPA is the lead partner⁵. It would be very improper for newly created habitat, funded by the public, to be lost to mineral extraction. There should also be consideration of the impact of the loss of a single heathland site on the entire ecological network given project's fundamental aim of connecting these isolated islands of rare habitat.

Additionally, whilst many of the Stage 3 site proformas mention the possibility of restoration to heathland, it is unclear how this will be achieved given that sand is a fundamental component of this habitat. It seems that some of the impacts on both Nature Conservation and Landscape designations have been downgraded somewhat due to the assumption that the site will be restored to heathland after it has been worked. In order to be sound, the plan must be effective and it is unclear to SWT how deliverable some of the proposed restoration schemes are.

Additionally it is not always clear how the balance has been struck between the expected harm caused to a feature due to mineral working and the opportunities to enhance the feature through restoration, or whether the long time period before restoration occurs has been factored in. This is evidenced by the long-term lack of restoration at Minsted Quarry and the apparent inability for the SDNPA to enforce restoration through current policy.

We also question the lack of consideration of ecosystem services within the 4SR. The potential impact on natural capital should be a fundamental component of the assessment criteria, especially for sites that sit within the SDNP. We acknowledge the commitment in paragraph 3.28 that the next iteration of the SA will consider Ecosystem Services, however we are concerned that this seems to be only in relation to potential enhancements through restoration. Any assessment of potential sites, whether in the 4SR or the SA needs to

⁴ <http://www2.westsussex.gov.uk/mlp/csd003.pdf>

⁵ <https://www.southdowns.gov.uk/care-for/heathland/heathlands-reunited/>

consider the ecosystem services currently being delivered by the site and how these will be impacted by mineral working as well as what the site might deliver once restored.

SWT is concerned that the stage 3 site proformas do not appear to estimate lorry movements and therefore we are uncertain as to the potential air quality impacts on heathland sites. Whilst we acknowledge that nitrogen deposition is usually only considered for European designated heathland sites but given the rarity of this habitat, there should be full consideration of likely negative impacts.

Question 5: Do you have any comments on the nine shortlisted sites identified in the Issues and Options Consultation Document?

SWT is more familiar with some of the shortlisted sites than others. We have made comments where our desktop research has indicated inaccuracies or invalid assumptions. However, we recommend that up to date ecological information in the form of baseline ecological surveys is collected for any sites taken forward. We do not think that informed decisions about the impacts on biodiversity and wider natural capital, or the suitability of proposed restoration can be accurately assessed without on the ground data. This is particularly important when considering allocations within the SDNP given the presumption against major development.

Bunton Manor Farm

Given the criteria we are able to see in Appendix 3 of the SA and the 4SR Site Assessment Framework, we agree that the RAG should be Amber for Nature Conservation and geodiversity designations & potential uses. However it should state that any potential harm to Ancient Woodland would need to be avoided rather than mitigated as per NPPF paragraph 175.

Chantry Lane Extension

As the site is currently inactive and presumably restored, we question whether this be considered an extension, especially given that the adjacent site is both a SSSI and a RIGS.

Coopers Moor

We question the description of the current use as woodland and ask the Authorities to investigate whether the site contains remnant heathland. This seems likely given its close proximity to Duncton and Lavington Commons and is important when assessing the likely impacts of working this site. If the site is heathland then we think the RAG assessment for Nature Conservation is an underestimate.

Duncton Common

This is a site where we particularly question the suggested restoration as the fundamental component of heath habitat is sand. Whilst SWT would support any heathland restoration in Sussex, it does not seem likely for many of these sites. Additionally we fully support the red RAG assessment for Nature Conservation in this proforma. Along with direct loss of heathland and other priority habitat, the working of this site would likely result in changes in the water table affecting areas of wet heath as we believe we have experienced on Stedham Common.

East of West Heath Common

SWT is not familiar with this site, however again we question whether this should be classed as an extension given distance from the existing site.

Ham Farm

As with Bunton Manor Farm, the RAG score for Nature Conservation should include the requirement to avoid impacts on the ancient woodland.

Minsted West

SWT have substantial concerns over the suitability of Minsted West as a potential allocation and would object to its allocation via the soft sand review.

SWT owns and manages the majority of Iping Common SSSI (and LNR) and has been concerned about the impact of the existing mineral works at Minsted on the SSSI for some time. In particular Stedham Common,

which makes up part of Iping Common SSSI, appears to have been drying out for a number of years, as noted in the Sussex Wildlife Trust's current management plan for the site: '*The wet heath in the southern end of Stedham is certainly drying out – possibly as a result of the adjacent quarrying activities*'.

Indeed a suspension notice has been in effect on the site for over four years as the operators have failed to provide sufficient environmental information for the SDNPA to be able to conclude the Periodic Review of Minerals Permission initiated in 2013 (SDNP/13/06169/ROMP). Given the irresponsible behaviour of the current operator, SWT believe it would be reckless to allocate an extension, allowing further time for the current site to remain inactive and unrestored.

The stage 3 site proforma for Minsted West states that this allocation would be an extension of the existing site and that '*open water would be connected to an existing water body*'. This makes a clear pathway for potential significant adverse impacts on Iping Common SSSI. We believe that the current RAG score underestimates this impact. Additionally the cumulative impact RAG score for Cooper's Moor includes concern that extension of the site would delay restoration of the existing sandpit. We are unclear why this is also not the case for Minsted West where we have been waiting for restoration of the existing site for many years.

This is a site where we strongly question the possibility of the site being restored to heathland. Looking at the existing minerals site there appears to be no hope of sensitive restoration fitting with the SDNPA designation.

We believe that the working of Minsted West is likely to result in unacceptable adverse impacts on the natural environment contrary to NPPF paragraph 205.

Severals East

We also question the Nature Conservation RAG score for this site given the presence of Ancient Woodland within the site boundary. The framework is clear that loss of Ancient Woodland should result in a red score, but this does not appear to have been considered. If the Ancient Woodland will not be lost through working of the site then it should be excluded from the site boundary. It should also be considered unacceptable to loss any heathland from this site given its location within the Heathland Reunited project area.

Severals West

Given the proximity of East of West Heath Common and Severals West to Minsted West and Iping Common SSSI, there would likely be in combination negative impacts if more than one of these sites were to be worked simultaneously.

We also question the Nature Conservation RAG score for this site given the presence of Ancient Woodland and a Local Wildlife Site within the site boundary. The framework is clear that loss of either of these features should result in a red score, but this does not appear to have been considered. If the Ancient Woodland/LWS will not be lost through working of the site then they should be excluded from the site boundary. It should also be considered unacceptable to loss any heathland from this site given its location within the Heathland Reunited project area.

We are particularly concerned about impacts on the water table of working this site given the rare bog habitat within the LWS and the proximity of wet heath.

Question 6: Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

No comment

Question 7: Are there any sites that we should be considering that are not included in the Soft Sand Site Selection Report (4SR)?

No comment

Question 8: Do you have any comments on the sustainability appraisal of the potential sites?

Table 7.2 does not seem to correspond with the decision making criteria set out in Appendix 3 (although we cannot see this fully) or the discussion in the 4SR. For example, all of the sites except one come out as blue for SA objective 6 i.e. the policy is likely to have mixture of positive and negative impacts on the SA objective. However in the commentary for sites (Table 7.3), Duncton Common for example is 'severe harm to wet healthland, SNCI, BAP and SPA/Ramsar'. Similarly Severals West includes Severals Bog SNCI which will clearly be impacted, but the level of impact is not listed in Table 7.3 and the results are still blue in Table 7.2.

In general, SWT believe that all of the results for SA objective 6 have been significantly underestimated and it is clear that the RAG assessment in the 4SR is much more successful at assessing the sustainability of allocating the various sites (with the caveats listed in our response to question 5).

It is difficult to make comments on all the issues with the SA given the formatting issues on many of the tables. We ask that the SA is re-consulted on when all the information within it is legible.

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 sites?

It is not clear how the guiding principles set out in paragraph 4.9 fit with the 4SR, how each principle is assessed and what weight is given. For example, a number of the sites are listed as extensions, but there does not seem to be a definition of what an extension means. Chantry Lane is inactive and presumably restored, so should this be considered an extension? Similarly East of West Heath Common appears to be some distance from the existing site. If the Authorities plan to favour extensions over new sites it needs to be clearly explained what constitutes an extension.

The need to conserve protected sites seems to be quite a low bar when the NPPF makes it clear that exceptional circumstances are required when permitting major development within a National Park. A principle for allocating within the national park should be whether exceptional circumstances exist to allocate. We acknowledge that this section of the NPPF is primarily aimed at the application stage. However in order for the plan to be sound it must be effective and justified i.e. it must be considered that a site allocated in the plan is likely to get planning permission. Therefore there needs to be consideration of exceptional circumstances now.

Please do not hesitate to contact SWT about any of the above comments.

Yours sincerely,

Jess Price
Conservation Officer.

Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-03-15 10:05:32

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

Mr

First name:

David

Last name:

Payne

Job title (where relevant):

Senior Planning Advisor

Organisation or affiliation (where relevant):

Mineral Products Association

A2 Client Details if applicable

Title:

First name:

Last name:

Job title (where relevant):

Organisation or affiliation (where relevant):

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Other:

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

We recommend using and planning for highest demand scenario (Scenario 3) to ensure that sufficient provision is made to meet potential needs, as proposed in para 2.10 This is sensible to take account of planned growth in housing and reflecting use of soft sand in mortar, with strong relationship with housing development to be expected given the use of mortar in housebuilding. (Table 4 of the LAA).

The LAA (Table 1) indicates that sales of land-won sand and gravel have increased in recent years, with the 3 year average exceeding the 10 year average by almost 30,000t (10%), the 3 year average (assuming 95% of sales) is 320,717t with 2017 sales at 359,000t, all indicating that basing provision on the 10 year average alone would not be appropriate or adequate.

In calculating the 'shortfall' to be provided for over the Plan period, it should be recognised that in order to maintain a landbank of at least 7 years' supply throughout the Plan period, and to accord with the NPPF and PPG, at 2033 there will need to have permitted reserves of at least 2.6mt (Scenario 2 = 2.557mt and Scenario 3 = 2.607mt). This total needs to be added to those in the table on page 10 and para 2.10.

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

Commercial development will also influence demand, but the focus on housing is sensible given the quantum can be determined from planned provision in Local Plans and housing is likely to be the major market for soft sand (used in mortar).

PPG recommends that in looking ahead at possible future demand LAAs should consider 'levels of planned construction and housebuilding in their area and throughout the country' (Paragraph: 064 Reference ID: 27-064-20140306). West Sussex is a net exporter of sand and gravel. Therefore, potential demand from neighbouring areas, particularly where there are limited or no soft sand resources, should also be a factor that is considered. This includes Brighton and Hove, which has no resources or reserves, but planned growth in housing of over 60% over the Plan period (Table B1 of the LAA). Overall, there is planned growth in housing of almost 30% across West Sussex and neighbouring areas, indicating that this should be factored in to forecasting demand and making provision.

The potential availability of supplies from elsewhere, taking into account resources and reserves, and distance of these from markets in West Sussex are also relevant factors – considered in the Options C and D in the document These have been considered in detail by the planning authority over the last few years including in preparation of the Joint Minerals Local Plan, and by the inspector at the plan examination in 2017. As noted in the inspector's report (paras 23-33), the soft sand resource in West Sussex and SDNP area is of local and regional importance, and that there cannot be reliance on imports from Kent, Oxfordshire, Hampshire or Surrey to meet any shortfall that may arise in West Sussex over the Plan period. Nor can there be reliance on marine sources at the current time (ie the Plan period).

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Reflecting our comments above, it would be prudent to apply an assumption that planned housing in West Sussex and neighbouring areas increases by 30%, which would more accurately reflect the demand that may arise and need to be met including in areas with no soft sand resource eg Brighton & Hove. In addition, the total that should be planned for needs to include the maintenance of a landbank of reserves of at least 7 years' supply at the end of the Plan period at 2033.

Part C - Issue 2

2a Do you consider that all 'reasonable alternatives' for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

Yes

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

Option A

Reliance on this option alone is unlikely to provide sufficient reserves to meet the required provision over the Plan period, as identified in the SA (with only 2 of the proposed shortlisted sites being outside the SDNP with a total estimated yield of 1.725mt).

Option B

This option would be more likely to meet the required provision, as identified in the SA.

Option C

Reliance on this option alone is risky and it has not been demonstrated that it would meet the required provision, as evidenced by statements by other potential supplying authorities and the conclusions of the Joint MLP examination inspector. This option could also result in potential significant negative impacts on transport and air quality as identified in the SA.

Option D

The MPA and BMAPA has recently questioned its members about dredging and landings of marine soft sand in Sussex. The only soft sand landed in Sussex that they report relates to re-location of vessels from the Bristol Channel to the South Coast bringing loads, with no 'commercial' operations regularly landing marine dredged soft sand at Sussex wharves, although there have been some trial dredges recently. Landing of soft sand, should it be licensed and dredged, in commercial quantities would require dedicated dredger capacity as well as wharf space, to avoid contamination of material with coarse sand and gravel. This wharf space and dredger capacity does not exist at present. The tonnages of soft sand reported in the document as being sold from wharves is very small at c.22,000t. The statement in the document (para 3.23) that industry is 'turning towards utilising this [marine soft sand] resource' does not appear to hold true.

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

Option B should be taken forward, given the lack of evidence that the alternatives are viable, and indeed the conclusions of the inspector's report of the Examination of the Joint Minerals Local Plan that demonstrated these could not be relied on.

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

No

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

No

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Tick all the site boxes that apply (above) and provide comments below.:

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

No

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

no

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)?

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)?:

No

Part E - About You (The Equality Act 2010)

More questions About You

Age

█

████████████████████

█

█

What is your ethnicity?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-03-18 11:18:41

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

Mr

First name:

Howard

Last name:

Ewing

Job title (where relevant):

Chair

Organisation or affiliation (where relevant):

Bpton Parish Council

A2 Client Details if applicable

Title:

First name:

Last name:

Job title (where relevant):

Organisation or affiliation (where relevant):

A3 Contact Address Details

Same as details provided in A1

Name:

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Resident, Parish/Town Council

Other:

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

This is a very odd question. It presupposes that respondents to this consultation have an alternative view of the correct level of soft sand demand with evidence to back it. It appears like a question designed to be impossible for the ordinary respondent to answer.

The assessment of Soft Sand demand/need in the Local Aggregate Assessment (LAA) is deficient and needs to be rewritten. It is not transparent. It contains internal inconsistencies. And it obfuscates.

For example, that LAA suggests that sales of Soft Sand have been reducing and that West Sussex has a landbank of, in the West Sussex dashboard, 7.4 years or 9.3 years in paragraph 2.1.21. Which is it?

It is also not good enough to hide behind "Due to confidentiality restrictions, import and export data figures were provided by BGS as a percentage range of total supply to each Mineral Planning Authority, to provide an indication of the relative importance of each supplying Mineral Planning Authority." In a public consultation, to determine whether National Park land will be devastated, there must be transparency.

The ranges used in Table 5 of the LAA are meaningless. How can anyone be asked to plan on the basis of a range of exports, of land won sand and gravel, from West Sussex of 42,400 – 275,600 tonnes? Added to this, there is a further 15,400 – 154,000 tonnes of land won sand and gravel which can't be accounted for. Apart from the lack of usefulness of such a wide range, it gives us no indication of how much of that is Soft Sand. And this is a Soft Sand Review.

The LAA seems to accept that West Sussex is a net exporter of Soft Sand and notes the restrictions within West Sussex, particularly in the South Downs National Park. It beggars belief that the National Park could be dug up to export Soft Sand as far afield as Buckinghamshire and Oxfordshire. Because the assessment is based on, amongst other things, previous sales, it builds in the needs of other counties who have hitherto imported sand from West Sussex. Given the high level of protection afforded to a National Park, this approach to assessment highlights that the basis for demand, or need, is flawed.

It does not sufficiently address the question of marine won Soft Sand. There are references in the LAA which suggest that marine won Soft Sand is landed and used in West Sussex. And that marine won Soft Sand is suitable to be used for mortar. Moreover, The Crown Estate has produced a Marine Aggregates Capability & Portfolio (2017), which suggests that there are unused banks of sand and gravel, including Soft Sand around the coast, including the South Coast.

The housebuilding forecasts look unrealistic. It is unlikely that all of the planning authorities in West Sussex are able to maintain a 26% increase year on year. The 26% figure was reached by comparing a point where housing delivery dipped, with one where it peaked. It is therefore an unrealistically high percentage increase, which can't be used to look forward. Indeed, the projected figures more or less flat line once they 'catch up' from the previous dip in delivery. This is another flaw in the approach to assessing demand.

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

The construction industry has been using Soft Sand for years. This is not sustainable in a number of senses. First, Soft Sand, is, as Government policy acknowledges, a finite resource. It will therefore run out at some point. The time has come to wean the construction industry away from Soft Sand. Second, it is hardly sustainable to dig up part of a National Park to extract the remains of a finite resource. And third, as the recent Climate Change Committee report on Housing (UK Housing: Fit for the Future? Feb 2019) pointed out, the UK will not meet its statutory climate change targets without a wholesale change in the way that houses are built. Specifically, it suggested a move away from high carbon materials such as cement and concrete and greater use of wood.

All three of these would point to a reduction in the need for Soft Sand extraction.

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

This response has pointed to the deficiencies in the LAA. For example, the LAA says that there is either a sandbank of 7.4 years or 9.3 years (see our answer to Q1A for references). However, the supply requirement is for at least 7 years. It seems obvious therefore to point out that there is no major shortfall and a minimal amount of Soft Sand is needed over the period. We have also made the point that West Sussex appears to be a net exporter. Given the highest level of protection given to National Parks, it appears absurd that a National Park be dug up to provide sand for other parts of the country. And the response to Q1B points to factors which will reduce the demand for Soft Sand.

Part C - Issue 2

2a Do you consider that all 'reasonable alternatives' for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

No! This response has pointed out that sufficient consideration has not been given to marine won Soft Sand. It appears that all other areas of the country use marine won Soft Sand, except the South East. The South East lands Soft Sand but the documents relating to this consultation do not know where this Soft Sand is used. That is not good enough and demonstrates the deficiency in the assessment of need. And given that there is a presumption that Soft Sand can be exported to other parts of the country, no consideration appears to have been given to importing Soft Sand to West Sussex.

As pointed out earlier, there is no consideration to alternative approaches to constructing houses which the Climate Change Committee has pointed out are

needed in order to meet the Government's statutory climate change targets.

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

If this question means the sites which have been identified, Bepton PC is adamantly opposed to the proposal that Severals East and Severals West be used as Sand Quarries. These have featured in previous reviews & plans and have been removed. Both of these sites are in the South Downs National Park; have natural and prized habitats based on their heathland nature; form a heathland corridor in a project funded by the Park; are well-used amenities by the public; and are assets that once quarried would be lost forever. More detail will be in the responses to the specific questions about the sites.

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

We think that Option C, as hinted at in the Issues and Options document, should be explored further. We also consider that Option D has not been sufficiently addressed and should merit further consideration. Both of these options would answer our concern that the National Park was being dug up, not only to provide Soft Sand for West Sussex but also to export it to other areas. We would also be in favour of Option E if it excluded quarrying in the National Park.

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

The best that can be said about the SA/SEA is that it is a work in progress. Having said that, it does contain significant red ratings on landscape and air quality issues. It does not, at this stage, give a proper assessment or appraisal of the sites of particular concern to Bepton PC - Severals East and Severals West. Incidentally, it states that these sites are in Wiston Parish. They aren't; they are in Woolbeding with Redford Parish. A basic error like that undermines faith in the SA/SEA. More detailed work would need to be done before this document was anything like a proper SA/SEA. It therefore calls into question the Issues and Options document - before sites are considered further SA/SEA work needs to be done. As SDNPA/WSCC will be well aware, once a site is included in a draft plan it can raise expectations and gather a momentum of its own which is difficult to resist.

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

The site selection methodology in Appendix 4 (Stage 3) is an initial assessment based on a desk top study. There is clearly a great deal more work to be done on the assessment and we have noted that the Sustainability Appraisal (incorporating the Strategic Environmental Assessment) needs significantly more work.

These sites have been ruled out in the last three reviews (2005, 2012 & 2018). We assume that they are included in this one because they are being promoted by the land owner, Cowdray Estate. We have made further general & specific comments in answer to the next section.

In the light of all of this, it does seem to Bepton Parish Council that a very low bar has been set, which has allowed Severals East and West to be included on the list. We therefore question the assessment process.

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Minsted West, Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

By virtue of its scale, character and nature, minerals development has the potential to have a serious adverse impact upon the natural beauty, wildlife, cultural heritage and recreational opportunities provided by the South Downs National Park. The National Planning Policy Framework (NPPF) specifically addresses the question of minerals extraction in National Parks, where it says that "as far as is practical, provide for the maintenance of landbanks of non-energy minerals from outside National Parks" (para 205).

As the draft SA/SEA acknowledges, minerals development is considered as 'major development' and would be subject to 'exceptional circumstances' and 'public interest' tests.

A key duty of the National Park is "to conserve and enhance the natural beauty, wildlife and cultural heritage of the area." We do not understand how proposing destructive development such as a sand quarry in this tranquil and special flora and fauna habitat is compatible with that duty.

We are therefore surprised that a number of the sites included the list, and we are particularly concerned about Severals East and Severals West, are within the National Park. We are also concerned about the site at Minsted West which is close to the Severals sites. And, we consider that the cumulative effect of these sites would have a significant detrimental effect to the National Park, to Midhurst and to its surrounding villages. Apart from damage to the environment, the landscape, flora and fauna, we do not have the infrastructure to deal with the heavy traffic that would result.

Moreover, we do not understand why the Severals sites are included again having been ruled out in the Issues and Options stage of the previous attempt at a Plan (2005), in the outcome of the South Downs National Park Soft Sand Survey (2012), and were ruled out in the last draft Minerals Plan (2018). And the 2012 Survey noted that Severals East and West were not successful in the 2009 long listing "due to deliverability issues" (Table 7.4). Given the history of rejecting these sites, we would question their inclusion in this Issues and Options consultation. We assume that it is because they are being promoted by the landowner, Cowdray Estate.

SEVERALS WEST

Bepton Parish Council opposes the inclusion of this site in the list of those suitable for extraction of sand. We have covered some of the reasons in the foregoing. The Severals are well used by local people for informal recreation and the loss of these sites would have a significant negative impact on the local amenity.

Our key concerns are as follows:

*Compatibility with the National Planning Policy Framework which points planning authorities away from extracting non-energy minerals from within National Parks ;

*Detriment to the the landscape - this site was previously ruled out by WSCC as being unsuitable on "landscape grounds";

*Deliverability - this site was ruled out in 2009 as noted in the South Downs National Park Soft Sand Study (2012) on grounds of deliverability;

*Habitats and Wildlife – the SDNPA created a habitats corridor to encourage heathland wildlife, flora and fauna as the sign the SDNPA proudly placed there (see below) stated. The landowner, Cowdray Estate, worked with the SDNPA in this project. We understand that the Estate also received public funding to clear rhododendron as part of their "" ongoing commitment to preserving and enhancing the local area". The Cowdray Estate website states "Not only has our work enhanced the area, The Severals is now a much nicer place for the public to enjoy walking around." The site contains priority habitats of lowland heath and ancient woodland and is a natural habitat for endangered and protected species, such as the Nightjar and Woodlark. Digging it up for a sand quarry would destroy all of that;

*Cohesion of the land. The continuity of the West Sussex heath commons west of Midhurst, of which Severals forms a key part, would ultimately be destroyed. The SDNPA, in partnership with others including WSCC, recently won funding for the Heathlands Reunited Project. This project is aimed at restoring and recreating heathland. Allowing sand quarries at Severals East would undermine that work;

(NB - At the time, the SDNPA placed a sign in this area explaining the work they were doing in conjunction with the Cowdray Estate. It said: "The Cowdray Estate and the SDNPA are working in partnership to create this Heathland Corridor. Heathland is a very fragmented habitat and the creation of this corridor will help enable species to move through the landscape between Midhurst Common, the Severals, and Iping and Stedham commons. In doing so, this will increase the diversity of these sites and the viability of the various populations present on these heaths.")

*Hydrology – the proposed quarries would have detrimental impact on the water environment, in particular on drainage and water quality, and also on the significant & important Severals Bog, which is an SSSI (C105). The bog supports interesting plants, fungus and molluscs. As previous WSCC/SDNPA studies have noted, "Even with a buffer strip, the bog habitat could be vulnerable to local changes in hydrology as a result of mineral working." (Minerals Sites Study 2014);

*Noise, dust and air pollution would affect the amenity of local residents and those who use this valuable informal recreation land. Severals House would become an island surrounded by sand quarries. Their amenity would not so much be affected as destroyed;

*Traffic – access to the site is poor. We understand that to transport this amount of sand would require 200,000 HGV journeys. There are limitations on the number of HGV routes — either the dangerous exit/entrance onto the A272 or through the village at the North end and down Severals Road past the pub and houses. Moreover, the routes away from the Severals would either involve going through Midhurst (and past the primary school), which is about to become an Air Quality Management Area, or towards Rogate travelling over the 500 year old Trotton Bridge. Either is unacceptable ; and

*Ancient Woodland – although many of the trees are of modern planting there is ancient woodland which would be adversely affected.

SEVERALS EAST

The comments about Severals West in the main apply equally to Severals East for obvious reasons. However, the Severals Bog is clearly located at the edge of Severals West. We do not see any point in repeating them. We ask you to read the comments under Severals West across to Severals East. For clarity, Bepton Parish Council opposes the inclusion of Severals East.

MINSTED WEST

Bepton PC considers that this site is very closely linked to the Severals East and West Sites. We would object to its inclusion on the list for similar reasons to those we have put forward for the Severals sites. We are also concerned about extending the Minsted site in such proximity to the Stedham and Iping SSSIs and to the Severals sites.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

We have made the point that the assessment of need is flawed and general points about destroying areas of the SDNP for soft sand extraction. These comments apply to the other sites, particularly those in the national park.

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

Marine sites have virtually been ignored in this consultation.

WEST SUSSEX SOFT SAND REVIEW: ISSUES AND OPTIONS

Please complete and return this form to Planning Services, West Sussex County Council, County Hall, Chichester, PO19 1RH by **18 March 2019**. Visit our website for further information: www.westsussex.gov.uk/mwdf.

Data Protection/Privacy: West Sussex County Council is registered as Data Controller(Reg. No. Z6413427). For further details and information about our Data Controller, please see www.westsussex.gov.uk/privacy-policy.

PART A: PERSONAL INFORMATION

A1. Personal Details

Name

Job Title (where relevant)

Organisation or affiliation (where relevant)

A2. Client Details (if applicable)

If you are completing this form on behalf of someone else then please provide details of the person(s) or organisation you represent.

Name

Job Title (where relevant)

Organisation or affiliation (where relevant)

A3. Contact Address Details

Please provide details of the person who should be contacted regarding this response

Address

Telephone

Email

Preferred Method of Contact

Post

Email

Please tick all categories below that most adequately describe you.

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> Resident | <input type="checkbox"/> Parish/Town Council | <input type="checkbox"/> SDNPA Member |
| <input type="checkbox"/> Local Business | <input type="checkbox"/> District/Borough Councillor | <input type="checkbox"/> Government Organisation |
| <input type="checkbox"/> Minerals or Waste Industry | <input type="checkbox"/> County Councillor | <input type="checkbox"/> Non-Government Organisation |
| <input type="checkbox"/> Landowner | <input type="checkbox"/> Local Authority | <input checked="" type="checkbox"/> Other (please specify) |

If you submit a consultation response, your contact details will be used to automatically notify you of updates with regards to the soft sand review and minerals and waste planning policy. Please tick the appropriate box if you **DO NOT** wish to be notified of the following.

- Progress and consultation on the Soft Sand Review
- Any further updates about Strategic Waste or Minerals Planning in West Sussex

WEST SUSSEX SAND REVIEW: ISSUES AND OPTIONS

Summary of Objections and Concerns to New Quarries

Future Needs for Soft Sand

Concern is expressed at the sources for the figures of 1.6 - 2.8 mts shortfall of soft sand. Future needs for the WSMLP are said to have been established from two assumptions. Firstly 26.8% housing growth will occur in West Sussex to 2033. This seems high when the National Office for Statistics states that the National population will grow at 7.01% over the same period to 2033. Secondly, Quote "Up to 91%" of Sand & Gravel may be used in the construction of new housing. This review is intended to be a soft sand review and not sharp sand and gravel. The question is why is there so much reliance on this data when the usage of soft sand is a fraction compared to sand and gravel? Furthermore for the needs of soft sand to 2033 care should be given to the WSMLP demand data because the authorities approach was to plan for the highest demand scenario.

The projections to 2033 and beyond for housing shows a trend of more prefabricated housing that replaces levels of cement & concrete with more wooden frames and steel structures replacing . The recent report "UK Housing: Fit for the Future" concludes that government targets for greenhouse gas emissions would not be met without widespread changes in housing construction practices.

Exclusion of Marine Sands

It appears that Marine Sands have deliberately been excluded from the reserves available until 2033. West Sussex exports 1.82mt to the London area. The London area is currently using more wins from the Thames estuary and the projections are that wins from marine sands are projected to grow. No reason has been provided yet by the authorities for the omission of Marine Sands.

Encroachment into the South Downs National Park

NPPF states that "*great weight should be given to the conserving and enhancing landscapes and scenic beauty in National Parks. And goes on to say (National Parks) "should have the highest status of protection in relation to these issues."* This is policy and should be adhered to.

The use of the term "Exceptional Circumstances" – Case Law

Although there is no formal definition or standard set to assessment criteria to demonstrate exceptional circumstances it does not mean by its use authorities can do what they want. In a recent court case the conclusions were "*If challenged, the Court can declare the adoption of a plan unlawful and quash it if the plan-maker has failed to take a lawful approach to exceptional circumstances.*" Later comment "*It is not possible to convert unexceptional circumstances into exceptional circumstances simply by labelling them as such*"

RAG assessments

With Amber/Red the evaluations often lead to the words "Mitigation required" as though this is the solution. However the word mitigation on its own means very little. It would be beneficial if there was an explanation in detail, explaining exactly what are the proposed solutions to the problems.

Sustainability Appraisal

The SA's and site selection only cover 50% i.e. the construction of a quarry to production. The question residents and visitors would like to be answered is what strategy is in place when a quarry reaches the final stages of economic exhaustion and peak environmental damage?

**Question 1A: Which soft sand demand scenario do you think that the Authorities should use?
Please provide reasons for your views.**

Option E – combination of Option A, C and D

To summarize our choices we are recommending Authorities to strictly avoid new quarry developments in the South Downs National Park.

Option B The objection to Option B is very much in line with WSCC existing policies and also those of the South Downs National Park. For example within your Single Issue Soft Sand Review 3.2 reference is made to the NPPF paragraph 172 that “*great weight should be given to the conserving and enhancing landscape and scenic beauty in National Parks*” and then it goes on to say (National Parks) “*which have the highest status of protection in relation to these issues*”

Furthermore we understand the term “exceptional circumstances” has been used to justify the inclusion of the South Down National Park within the new quarry site selection, however the language states “exceptional circumstances **and** where it has been demonstrated it is in the public interest”. (Not **or**). We are not aware that new quarries developments in a National Park has been demonstrated to be in the “public interest”. This was omitted in the WSMLP report.

What has been demonstrated is that the creation, maintenance and sustainability of SDNP is in the Public Interest and Nations interest.

Ref source: West Sussex JMP 6.2.14.3 and NPPF para 172.

Option C – Marine dredged sand and aggregates production has increased substantially over the last 10 years. The likelihood is that this will continue to increase to be a favourable option. Marine dredged soft sands are increasingly won in Thames estuary and Severn estuary in addition to the South East Coast. The projected increased wins in these areas will add considerably to the reserve figures in the next decade.

It appears that the WSMLP has discounted the reserves of marine sands “on this occasion” to 2033. If the reserves of marine sands were included in the WSMLP assessment 2018-2033 then there would absolutely be no need to quarry in the South Downs National Park.

“The Authorities have stated in the Inspector’s report (item 29)

Quote “that there is potential for marine won soft sand to contribute to a steady and adequate supply of soft sand in the Plan area, but were not seeking to rely on this to meet the identified need within the Plan. Therefore, it was agreed at the hearing sessions that this was not a viable alternative to land-won soft sand at the current time.”

References used

Report to West Sussex County Council & South Downs National Park Authority by Jonathan Manning BSc (Hons) MA MRTPI an Inspector appointed by the Secretary of State for Communities and Local Government Date 30 May 2018

Ref source: Ref source – South East Aggregates Monitoring Report

Draft Statement of Common Ground on Soft Sand Supply in the South East Version 4.0: Final for South East MPA Formal Agreement Date: 11 April 2017

Question 1B: Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

It is said that West Sussex may have a local production shortfall compared to neighbouring soft sand Counties however increasing production in the South Downs National Park may not necessarily compete in the market in the same way. Existing out of county soft sand competitor quarries may operate with superior major roads and rail infrastructure which gives them a lower cost structure. This may lead to new quarries in the South Downs National Park on occasions being only marginally profitable and the owners may choose to keep production low in wait of better market conditions. The result of this would be that the quarry working life will be extended and consequently so will the landscape eyesore and environmental impact.

Within the Single Issue Soft Sand Review – Issues and Options consultation (January 19) there are section 2.8 and 2.9 which have two noted assumptions (1&2) and three 15 year soft sand needs scenarios. Firstly we don't understand how a 26.8% new dwellings growth (assumption 1) is converted into soft sand tonnage within table 4. There are many variables not considered. E.g. when it comes to estimating soft sand usage, one new residential dwelling could be a 4 bedroom detached house (1 unit) or a block of 4 one bedroom apartments (4 units). The soft sand usage per dwelling varies considerably. Assumption 2 states *"up to 91% of sand and gravel may be used in the construction of residential dwelling"*. The question is why are general sands and gravel being used to determine scenarios of soft sand needs?

Table 4 is the defining table for the lower scenario 1 of 1.66 mt and the higher scenarios 2&3 are driven by Assumptions 1&2 which produce an upper demand value of 2.83 mt. We don't consider the loose wording of both assumptions safe for projections and this matters when determining the needs for soft sand in West Sussex.

The house building industry is increasingly changing and modernizing with construction technologies that may not need the same quantities of soft sand during the next decade. If rapid house construction is to be achieved then new construction technologies will join the homebuilding market. For example Legal & General have already built a factory in Yorkshire to construct affordable Eco homes and plans to increase production to 3,000 homes in the next 4 years. They are not the only company investing in these new technologies and their growth may impact the soft sand market to the later stages of the WSLMP 15 year plan for soft sand. This needs to be studied and the findings incorporated into the demand figures.

Lastly as a general comment the reserves of existing quarries often get revised up and consequently an updated review and inclusion may make an impact on the soft sand demands in the WSLMP plan.

Question 1C: Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/ evidence to support your view. Yes

West Sussex has a net exporter of 1.82mt of soft sands with London area being the prime market. There are several references to the growing market of marine soft sands which are abundant in the Thames estuary, South coast and the Bristol Channel. For an unexplained reason the Inspector's report made a deliberate decision to ignore the growing contribution of marine sands for this consultation to 2033, and I was wondering whether this may have come about through lobbying pressure from landowners of assets and quarry companies. No reason for omitting marine sands has been given and including future marine sands wins from the Thames Estuary would eliminate the need for West Sussex to export soft sands to the London area. .

The quantities of soft sand are driven by two assumptions.

Assumption 1 *"The construction of new dwellings in West Sussex is projected to grow by 26.8%"*

Why 26.8% growth is unrealistic and accompanying evidence.

From the Office of National Statistics the national population from 2018 to 2033 will grow from 66,466,000 to 71,123,000 which is 7.01%. The National Statistics Office does not show a radical deviation for West Sussex so I can only conclude the 26.8% figure for dwelling growth is unconvincing and unrealistic.

Assumption 2 *Up to 91% of sand and gravel may be used in the construction of new residential dwellings.*

Comments on Assumption 2

- a) "Up to 91%" What does this mean? It could mean one house in a 10,000 has 91% and this statement still applies.
- b) "sand and gravel" This consultation is for soft sand only. Introducing gravel and sharp sand will inflate the content and increase percentages considerably.
- c) "may be used" may instead of "will be used" means any figure you put from 5%-95% will qualify.
- d) "new residential buildings" The demands for soft sand will be less because new residential buildings are smaller and deter designed than those being completed today.

Period to 2033

In the recent report "UK housing: Fit for the future? Committee on Climate Change – February 2019. There is great emphasis on material demand changes from traditional sand and cement to more wooden and steel frame structures for new housing. Worldwide cement manufacture contributes to 10% of carbon emissions.

Today Legal & General have constructed a factory in the England that is building high quality pre-fabricated housing and by 2022 they plan to produce 3,000 units a year. The point being made here is soft sand demand will be changing considerably by 2033.

Part C: Issue 2

Question 2A – Do you consider that all reasonable alternatives for soft sand supply have been identified or are there other options that we should be considering?

Do you consider that all reasonable alternatives for soft sand supply have been identified? NO
Are there other options that we should be considering? YES

Please note that many of the questions being asked seem to overlap and so consequently, some of the answers are repeated too.

Opening up new quarries in a National Park is a too high price to pay environmentally. The whole of the South Downs Park has received heavy investment from both public and private sources to preserve the unique flora and fauna of the Park. It is our heritage for the future and like all the UK National Parks – they need environmental protection by and not from local authorities.

Reasonable Alternatives – in previous answers marine sands has been discussed and more investigation needs to be done on evaluating this potential source. In recent years there has been soft sand wins which have developed through a satisfactory economic model. It should be noted that the greensands belt of soft sands is also geologically a marine sand. If the London area grew the Thames Estuary sands then soft sand exports from the South Downs National Park would not be required.

Another alternative is to review regional data. That is existing quarry production and 5, 10 and 15 year tonnage estimates per quarry. The data in the West Sussex Local Mineral report did not include actual data of existing assets and longevity or potential for augmenting wins. It maybe that West Sussex did not have this data when producing the consultation.

We would also recommend a data map of existing county movements overlaid by importing and exporting tonnage and also lorry routes especially if the consultation is projecting to 2033.

Question 2B Do you have comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

A recent report by the UK Independent Committee on Climate Change (UK Housing: Fit for the Future? Feb 2019) concluded that government targets for greenhouse gas emissions would not be met without widespread changes in housing construction practices. One of the specific findings was the need to improve the focus on reducing the whole life carbon impact of new homes by increasing the use of wood in construction and reduce high carbon materials such as cement and concrete. They recommend the implementation of new policies to change the way houses are built. These changes could significantly impact the requirements for soft sand in the long term.

In Text – Scott McKelvie

Question 2C. Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sands? Please give your reason.

Option E – combination of Option A, C and D

To summarize our choices we are recommending Authorities to strictly avoid new quarry developments in the South Downs National Park.

Our reasons are very much in line with your existing policies and also those of the South Downs National Park. For example within your Single Issue Soft Sand Review 3.2 reference is made to the NPPF paragraph 172 that *“great weight should be given to the conserving and enhancing landscape and scenic beauty in National Parks”* and then it goes on to say (National Parks) *“which have the highest status of protection in relation to these issues”*

Option C – Marine dredged sand and aggregates production has increased substantially over the last 10 years. The likelihood is that this will continue to increase to be a favourable option. Marine dredged soft sands are increasingly won in Thames estuary and Severn estuary in addition to the South East Coast. The projected increased wins in these areas will add considerably to the reserve figures in the next decade.

Ref source: Ref source – South East Aggregates Monitoring Report

Draft Statement of Common Ground on Soft Sand Supply in the South East Version 4.0: Final for South East MPA Formal Agreement Date: 11 April 2017

Question 3 Do you have any comments on the draft Sustainability Appraisal of the Options?

It is confusing to understand which report the reader is being asked to comment on because there are four sustainability appraisal attachments to the West Sussex Mineral Local Plan. These sustainability appraisal reports are full of valid comments as to why National Parks should not be exploited at the expense of protected nature. Equally they contain comments that simplify issues and categorize problems with “one solution fits all sizes” I have enclosed a few examples that may need reviewing by the authors.

Table 3.2 p19 Sustainability Appraisal including Strategic Environmental Assessment Main Report

Quote” Therefore, in the absence of the JMLP, employment in the minerals sector may decrease and have indirect effects on health and well-being due to unemployment.”

This comment is literally suggesting publishing the JMLP saves lives. If I am not mistaken the Sustainability Appraisal is stating that working in the Mineral Sector enhances health indirectly. Closer to the reality is that the disturbance of soft sand causes airborne silica particles which over time causes a number of medical conditions including cancer.

Table 7.3 Sustainability Appraisal Commentary for Sites – Assessing HGV Transport Impact

Hundreds of HGV in either or both Severals East and West are classified as having “*Moderate Transport Impact*” on a single track road and in the Soft Sands Sites Selection Report. The Sustainability Appraisal fails to consider existing sand lorry journeys and, for example, In Midhurst all existing lorry quotas are regularly exceeded. The local authorities have already been asked to increase Lorry Journeys for one local quarries to an average of 220 per day.

Several sites are classified as “*moderate Transport Impact*”. Have you considered that new additional HGV’s will be using the same routes as with existing sand/aggregate lorries. In many of the site examples the new proposed HGV aggregate traffic should be augmenting to existing HGV aggregate traffic and be reclassified as “*high Transport Impact*”.

6.2.3 Quote “*The National Park purposes are: (BLANK)*

1.”

This maybe an administration error but item 6.2.3 never was finished in the draft Sustainability report. It would have been interesting to understand what the authorities believe what is the purpose of the National Park.

Para 1.8: Given that the deliverability of extracting additional soft sand from the limited resource outside of the SDNP is uncertain due to a lack of information concerning viability and landowner intentions, it is possible that imports of soft sand may be more likely to occur than development of new extraction sites within West Sussex. Therefore, it is recommended that this policy option explicitly take a hierarchical approach to soft sand provision, by clearly prioritising supply from existing permitted reserves first and not allocating extensions or additional sites in the SDNP, then identifying additional allocations/areas of search beyond the SDNP, and finally allowing imports from outside the County if required. In addition, it is recommended the policy specifies that where imports are allowed, priority should be given to those that can be delivered via non-road transport modes.

Part D: Issues 3

Question 4: Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

The RAG system is a 1 to 5 colour assessment of some very complex environmental issues and has the danger of over simplifying the placement of quarries and the irreversible damage that is done to wildlife and areas of outstanding beauty. National Parks are relatively recent developments in countryside years and their designation is intended to preserve landscapes and wildlife areas that are ecologically fragile and the vision is to preserve such areas for the nation and future generations.

The Site Selection Methodology uses RAG extensively, however there is little weight applied in the evaluation of sites within the South Downs National Park. Where there is an Amber/red there is written "Likely to require major levels of mitigation". Within your methodology, complex problems like hundreds of HGV's passing through villages or wildlife corridors are simply combined with the word "Mitigation"

I would suggest that in your overall site selection you have reached 50% of the assessment required. I believe the other 50% should be an assessment of all required mitigations and costings. Furthermore it is worth mentioning that mitigation is not a 100% solution. By definition the word mitigation only means reducing impact.

I would like to see your methodology continue to the point of full restoration which of course may not be achievable but nevertheless should be assessed.

If I may give an example of Minsted Quarry which was initiated in the 1950's. It is near the end of its life and currently it is a gigantic excavation filled with stagnant water that struggles to support life any life. It is hidden by trees, it is a dangerous site and the public are prohibited from access.

Learning from this, all your site selection methodology should have mitigation solutions, a plan of implementation, monitoring, and the finance needs to be raised from the tonnage sales and put into an independent trust. While this would be difficult to implement with owners, it certainly would not be difficult to include with your site selection methodology.

Question 5 Do you have any comments on the nine shortlisted sites identified in the Issues of Options Consultation Document?

Severals East & Severals West. – These two sites are only separated by a single track road and Severals East joins up with Midhurst Common which is of similar terrain and wildlife to the Severals.

“The Severals” as both these sites are known are adjacent to the historic market town of Midhurst which is known as the “Heart of the South Downs National Park”.

Enclosed is an excerpt from Murray Marr who has studied The Severals for more than 40 years. Of immense and irreplaceable value is the 7,000 yr pollen record which is uniquely continuous back to the ice age. If the anaerobic bog is disturbed this will be lost.

The Bogs along Wolmer Stream

The Severals Bog and Quags Corner Bog make up a significant bog system along the western boundary of this proposed mineral extraction site. This system is of the topogenous mire type (valley mire). It is fed by Wolmer stream and it is designated as an SNCI, C105. Quags Corner Bog, SNCI C53, is classified as a rare example of a ‘hillside flush mire’. These mires underlie abandoned willow and alder copse. Osier beds are marked on the Woolbeding 1840 Tithe Map.

The C105 mire is of similar depth (some 15ft) to New Pond Bog about a mile to the east on the southern edge of Midhurst Common SNCI. This bog has a 7000 year pollen record with basal pollens (Juniper/tundra type plants) at about 10,000 years old. Apart from a pre-Middle Holocene hiatus in the stratigraphy, it gives us a near continuous landscape history from the end of the last Ice Age to present.

In 1995, Dr Rob Scaife conducted a scientific investigation of this bog on behalf of The Campaign to Save Midhurst Common (now The Friends of Midhurst Common). He stated that ‘Midhurst Bog is providing one of the very few records of vegetation changes for central southern England, spanning the last 7000 years of this interglacial period – the Holocene.’ (Quoted from: 1995, *The Midhurst Area Landscape Project* R. Scaife, N. Branch, M. Marr; a report for the Sussex Archaeological Society). The full results are published in *Midhurst*, Magilton J., Thomas S., Chichester District Archaeology 1, (2001), *The prehistoric vegetation of Midhurst: a pollen study of New Pond* by Rob Scaife, pp 95-102.

At the time, The Midhurst Area Landscape Project wanted to expand this study hoping to fill any gaps in the pollen record at Midhurst Common. We wanted to core another bog which was not too near yet not too far away; one which would open another window onto the local prehistoric and historic landscape. The Severals Bog had, and still has, the potential to be a perfect answer to this aspiration. Unfortunately, there was no funding by which to proceed.

Murray Mar 2014

Question 6 Do you have any comments on the 12 non-shortlisted sites in Appendix 3 of the soft Sand Site Selection Report (4SR)?

No Comment.

Question 7 Are there any sites we should be considering that are not included in the Soft Sand Site Selection Report? Yes

Marine Sands are becoming increasingly won in the Thames Estuary, Bristol Channel and along the South coast. While this is referred to in the West Sussex Minerals Local Plan there needs to be more information about this new soft sand win. Development of the Thames Estuary wins could easily replace the exporting of soft sands from West Sussex to London. Bearing in mind this consultation is valid to 2033 it would suggest that there is sufficient time for further development.

The second advantage of marine sands is that they can generally be transported along coastlines in barges which have a smaller carbon footprint than HGV's.

Finally I would like to mention that all the Folkestone soft sand beds are former marine sands formed in a low energy depositional environment.

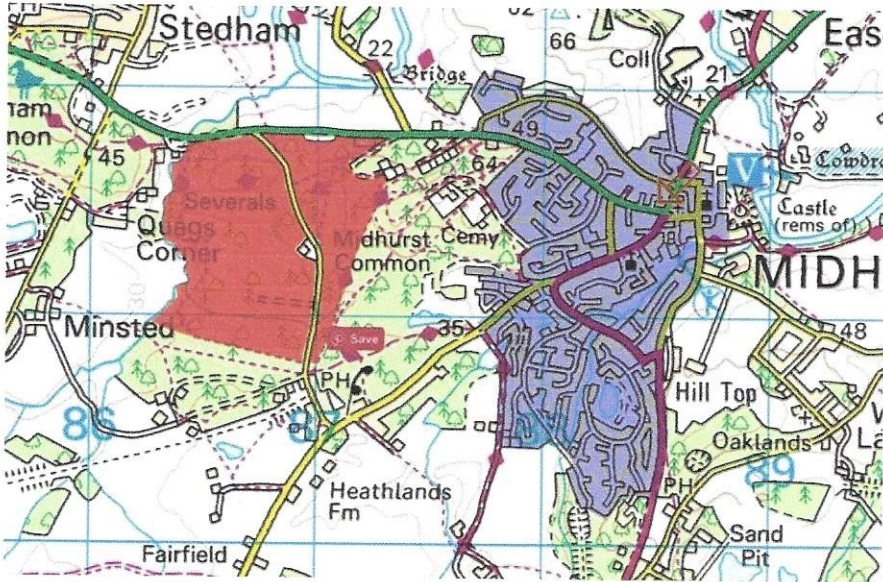
Question 8 Do you have any comments on the sustainability appraisal of the potential sites?

This question is similar to Question 3

Question 3 Do you have any comments on the draft Sustainability Appraisal of the Options?

Regarding Potential sites – The Severals East & West

There is very little information that leads one to believe that there would be sufficient sustainability for these sites and affected areas.



The Town of Midhurst – Showing the size of the overwhelming proposed quarries (red)

Johnathan Russell (Lord Cowdray's spokesperson) has been quoted in the Midhurst & Petworth Observer as saying *"restoration of quarries provides scope for improved biodiversity."* And *"Modern operating methods have been developed to the point whereby the activity creates minimal disturbance to the surrounding area and once restored former quarries are often difficult to identify after initial establishment of ground cover."*

These loose comments can easily be said today but who is picking up the mess during the next 50 years of operation? Will it be West Sussex tax payers?

I don't believe any Sustainability Appraisal can mitigate 80 hectares of destruction literally in the Heart of The South Downs National Park.

It is recommended that the sustainability Appraisal team visit both Pendean and Minstead quarries which both have contaminated water after 60 years. This is the reality and it needs to be reflected honestly in the Sustainability Appraisal.

Finally I notice that in many of the RAG assessments the word "mitigation" is the solution to Amber/red challenges. The word "Mitigation" on its own means very little. What is required is the solution being proposed for the Amber/red mitigation. The solutions can then be evaluated and modelled into the sustainability carrying forward to 2033 and beyond.

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 sites?

Cradle to Grave

Site selection at the moment only reviews the time of a quarry and environmental consequences to the stage of production which should be only 50% of a site selection process. The question many South Down National Park residents and tourists have is:

What site selection strategy is in place for when a quarry reaches the final stage of economic exhaustion and peak environmental damage???

Site selection strategy needs to consider the work and cost of restoration and who is going to pay. There is limited interest from the authorities and owners on this issue mainly because those individuals will be long gone in 30-50 years when a quarry reaches maximum liability. The responsibility and cost of the clear up needs to be a live concern from day one and this too needs to be factored into site selection strategy. One only has to look at quarries started in the middle of the last century which are economically finished and now leave massive contaminated excavated holes filled with stagnant water. These will remain until the next ice age if no restoration plans are financed and implemented.

The second comment “exceptional circumstances” seem to be driven by two assumptions

Assumption 1 “The construction of new dwellings in West Sussex is projected to grow by 26.8%”

From the Office of National Statistics the national population from 2018 to 2033 will grow from 66,466,000 to 71,123,000 which is 7.01%. The National Statistics Office does not show a radical deviation for West Sussex and 26.8% growth means for every existing 4 dwellings in West Sussex there will be 1 more built. A very unlikely occurrence. The assumption of 26.8% growth in West Sussex is a marked difference to the national figure of 7.0%

Assumption 2 “Up to 91% of sand and gravel may be used in the construction of new residential dwellings.”

- a) “Up to 91%” What does this mean? I could mean one house in a 10,000 and this statement still applies.
- b) “sand and gravel” This consultation is for soft sand only. Introducing gravel will inflate the content and increase percentages considerably.
- c) “may be used” may instead of “will be used” means any figure you put from 5%-95% will qualify.
- d) “new residential buildings” Please refer to “UK housing: Fit for the future? Committee on Climate Change – February 2019” which has highlighted the need to start replacing cement for wooden frames and steel content. Change is coming within the construction industry itself and for example Legal and General have already built a factory in Yorkshire that is producing quality production line housing. By 2022 they plan for production to reach 3,000 per year all made from reduced cement content.
- e) When preparing the JMLP the authorities approach was to plan for the highest demand scenario. The question is how many times has this contingency multiplicity taken place has. E.g. 10% contingency at 4 evaluation stages is 46% extra.

Legal Concerns – Exceptional Circumstance – Case Law

Furthermore there is no formal definition or standard set of assessment criteria to demonstrate exceptional circumstances. In a recent case with Elmbridge Local Plan “Exceptional Circumstances Case” the following was stated

“4.3.6 If challenged, the Court can declare the adoption of a plan unlawful and quash it (or parts of it) if the plan-maker has failed to take a lawful approach to exceptional circumstances. This means that it is not enough for a local authority or inspector to assert that exceptional circumstances exist: it is not possible to convert unexceptional circumstances into exceptional circumstances simply by labelling them as such.”

What I am saying is that the WSMLP is using “exceptional circumstances” to open new quarry sites in the South Downs National Park based on a claim of soft sand shortages in 2033. The evidence is based on two assumptions that are so widely defined they actually mean little. Not forgetting of course the WSMLP has deliberately left out marine sands wins in their tonnage estimates. Just to remind you that as London area uses more marine sands from the Thames Estuary then they will likely reduce the importation from West Sussex of soft sands.

Excerpts and references from the “Single Issue Soft Sand Review.

- 2.8 The LAA sets out the demand for soft sand to 2033, taking account of the previous 10 years sales (2008–2017), and the following assumptions;
- Assumption 1: the construction of new residential dwellings in West Sussex is projected to grow by 26.8%
 - Assumption 2: Up to 91% of sand and gravel may be used in the construction of residential dwellings
- 2.9 Table 4 of the 2018 LAA sets out the forecasts for soft sand demand between 2018 – 2033. Combinations of the assumptions, and taking account of the 10 year average of sales, gives three scenarios, set out below.

	Demand Forecast Scenario 1 (tonnes)	Demand Forecast Scenario 2 (tonnes)	Demand Forecast Scenario 3 (tonnes)
Assumptions applied	None (10 yr. avg. only)	1 and 2	1
10 year average	293,737		
Additional demand for housing (26.8%)	n/a	71,637	78,722
Total Annual requirement	293,737	365,374	372,459
Total requirement over Plan period (2018 – 2033)	4,406,062	5,480,613	5,586,887
Current reserves	2,745,000		
Shortfall	1,652,062	2,726,613	2,832,887

- 2.10 Therefore, based on the three scenarios in the above table, there is a shortfall of between **1.66 and 2.83 million tonnes (mt)** to 2033. When preparing the JMLP, the Authorities approach was to plan for the highest demand scenario, to ensure that sufficient provision is made for a steady and adequate supply of soft sand.

Other:

Progress and consultation on the Soft Sand Review

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Part C - Issue 2

2a Do you consider that all 'reasonable alternatives' for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

This is area is now a National Park.

The area is just beginning to reap some of the rewards of this with increased visitor levels - in 2015 Chichester district (of which this is part) generated £411m in tourism revenue - it creates around 14% of the employment.

Quarries on such a vast industrial would be hugely detrimental to this.

These sites contain part of the remaining 1% of rare heathland habitat remaining in SDNP and should not be destroyed.

The sites cannot be returned to heathland after quarrying as the sand which forms the heathland will have been removed.

There is some protected wildlife in the area - Dartford Warblers, Nightjars, Adders, Smooth snakes among them and also rare flora - mainly bog plants - Scarlet Elf Cup, Bog's Beacon, Twayblade orchid, Star Sedge, Purple Willow.

The sites also include some rare wetland habitat - Severals bog.

Records show it has been used for recreation for over 150 years - it is known as the 'lungs' of Midhurst and is the only place within walking distance of the town to walk.

One of the most popular walks in the SDNP and West Sussex runs right through both these sites, the Serpent Trail opened by Chris Packham in 2005 - quarries would destroy this.

These sites are clearly visible from South Downs Way and would ruin the views from the whole section from Treyford to Bepton Down.

Many tourists/visitors come to the Midhurst area to walk and cycle in beautiful countryside this would ruin an area the size of Midhurst town creating noise and air pollution.

The increased number of HGV's required would be an unbearable burden for the narrow rural roads which currently already suffer many HGV's from other existing quarries in the area. Midhurst already has an AQM issue.

Grade I listed Trotton bridge cannot bear any more HGV's going over it and these sites could have up to 300 lorry movements a day.

The Park House Hotel is the only 4 star hotel in the area and would be directly affected being only 2 miles from the site - going along Severals Road is the way visitors from the west and London would approach the hotel.

Cowdray Estate have received substantial (hundreds of thousands) grants to provide wildlife corridors and remove rhododendrons from the sites - all within the last couple of years. The wildlife corridor was part of the Heathlands Reunited project - if this area is quarried, this key link of the corridor will make the whole project a waste of time and money. According to Cowdray 'this is part of Cowdray's ongoing commitment to preserving and enhancing the local area'. On their website until 15 March, 2019.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

Part E - About You (The Equality Act 2010)

More questions About You

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[REDACTED]
[REDACTED]
Resident

Other:

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

Not qualified to comment

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

Availability of Soft Sand outside the recently designated National Park.

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Not qualified to comment

Part C - Issue 2

2a Do you consider that all "reasonable alternatives" for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

Not qualified to comment

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

Not qualified to comment

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

An increase in quarrying activity in the designated National Park is NOT acceptable.

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Not qualified to comment

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

Not qualified to comment

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Minsted West, Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

The management of the existing Minsted sandpit has been irresponsible. The site, currently closed, has been left in a dangerous and illegal state. The National Park and Chichester Council have done very little to manage and control the effective workings under the subcontract to Dudman & Co.

The sites identified, Minsted West, Severals East, and Severals West would cause huge disruption, substantial lorry movements, excessive noise and air pollution. Not only will this affect the tranquility of the Minsted and Severals areas but will be disastrous for the town of Midhurst, Iping Common and Stedham village.

The statutory responsibility of the SDNPA as a National Park authority is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area.

These proposals clearly fly in the face of its primary duty, and is clearly an opportunistic proposal by the Cowdray Estate to materially benefit from quarrying at our expense.

NO TO THE PROPOSED SAND QUARRIES AT MINSTED AND THE SEVERALS

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

Not qualified to comment

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

Not qualified to comment

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

Not qualified to comment

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)?

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)?:

Not qualified to comment

Part E - About You (The Equality Act 2010)

More questions About You

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[REDACTED]

To: [REDACTED]
Subject: PL MWDF
FW: WSCC Soft Sand Review of the West Sussex Joint Mineral Plan

STORRINGTON & SULLINGTON PARISH COUNCIL
THE PARISH HALL, THAKEHAM ROAD, STORRINGTON, WEST SUSSEX, RH20 3PP

[REDACTED]
Clerk: Mrs Tracey Euesden

Dear Sirs,

Members have reviewed all of the relevant paperwork regarding the abovementioned consultation and wish to make the following comments regarding the Chantry Lane extension (pages 44-52 of the Soft Sands Site Selection Report):

- The proposed new road across the fields to the A283 has been specifically ruled out in the Storrington, Sullington and Washington Neighbourhood Plan, as the view is named as being protected.
- The proposed new road would also be detrimental to nearby Listed Buildings including the Grade 1 St Mary's Church.
- Concerns are expressed regarding the cumulative effect of the recent application for the revised restoration of the Water Lane site and the number of lorry movements that involves – which is for 10 years. Should this be permitted the cumulative impact would be unacceptable.
- Implementing access from Sullington Lane rather than Chantry Lane will only industrialise another small rural lane which will require some form of traffic management, which will alter the landscape.
- Concerns are expressed regarding the effect on the AQMA and views from the National Park.
- Concerns are expressed regarding the effect on Chantry Mill (Listed Building).
- Bearing in mind the age of the settlement, members request that further archaeological and historical surveys are undertaken, as mentioned in the consultation document.
- HDC have opposed development of the Chantry Lane industrial estate because of flood risk, but this site apparently has no risk? Could you please explain as to why this is the case?
- Members wish to question the forecast house build rates to determine the demand for soft sand and the apparent doubts about marine sourcing as an alternative. Members are not convinced that marine sources are being sufficiently explored.

Kind regards

Caroline Read
Deputy Clerk

This e-mail is intended solely for the person or organisation to which it is addressed. It may contain privileged and confidential information. If you are not the intended recipient, you are prohibited from copying, disclosing or distributing this e-mail or its contents (as it may be unlawful for you to do so) or taking any action in reliance on it. If you receive this e-mail by mistake, please advise the sender immediately by using the e-mail reply facility and then delete both the incoming and outgoing messages.

From: [REDACTED]
Sent: 15 February 2019 11:04
To: PL MWDF
Cc: Parish Clerk (Midhurst)
Subject: Severals Soft Sand Consultation.

I write of behalf of Midhurst Town Council to lodge our objections to any possible sand extraction at the two Severals sites, owned by the Cowdray Estate.

Other parishes and individuals have written to you giving technical arguments against such development. We fully support them, principally the harm that sand extraction will do to the landscape and ecology of a sensitive part of our National Park. We also highlight the noise, pollution and volume of heavy traffic associated with such a development, particularly added to the existing traffic from the Pendean backfilling. We estimate that this may bring 800 heavy lorry movements per week to our already battered roads.

We appreciate that the Inspector has reopened the Minerals Enquiry as he must look at national demand for building sand. However it is important to question the actual demand against theoretical targets. House building, in particular is nowhere near the Government's building targets and actual building is barely half the target of 300,000 new homes. There is also no sign that house building rates will improve over the coming decade as a combination of a calcified planning system, house builders sitting on land banks, increased costs from Stamp Duty as well as a slow economy, affected by Brexit all play a part in killing demand. Commercial construction is similarly affected, particularly by the general down turn as again, there is no particular bright horizon for the construction industry.

This of course affects demand on building materials including sand and given the limited volume that the Severals would contribute to the demand for sand, it would be more sensible for the sand to stay where it is rather than develop the sites for extraction and find there is no demand.

Yours faithfully

Gordon McAra
Vice Chairman
Midhurst Town Council

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

The area will be destroyed as a wildlife habitat and quarrying is not an activity that should be undertaken in a National Park. The local roads are not built to take HGV lorries removing 4 million tonnes of sand from the area.

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Part C - Issue 2

2a Do you consider that all reasonable alternatives for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

No

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

This is a beautiful natural area for walking and recreation within a National Park and should not be considered because of the permanent damage it will do to the landscape and the misery it will bring to the residents of the area.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

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Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

Part E - About You (The Equality Act 2010)

More questions About You

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WASHINGTON PARISH COUNCIL



Clerk to the Council.
Ms Zoe Savill.
Email: clerk@washingtonparish.org.uk
Website: www.washingtonparish.org.uk

Planning Services (Ref.SSR)
West Sussex County Council
County Hall
Chichester
West Sussex
PO19 1RH

28th February, 2019

Soft Sand Review of the West Sussex Joint Minerals Local Plan: Issues and Options Consultation (Regulation 18)

Washington Parish Council has discussed the Soft Sand part of the Draft Minerals Plan consultation reopened by West Sussex County Council, which includes Ham Farm as a potential extraction site in neighbouring Wiston.

Members NOTED the Council's strong objection last October to the site allocation because of the impact of lorry movements on the nearby A283 Steyning/Washington Roads and Washington A24 roundabout, and increasing air pollution through Storrington village.

Washington Parish Council has **RESOLVED** to re-state the Council's previous strong objections in its submission to this current Consultation (Regulation 18)

[REDACTED]

Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-03-04 20:51:43

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

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A2 Client Details if applicable

Title:

First name:

Last name:

Job title (where relevant):

Organisation or affiliation (where relevant):

A3 Contact Address Details

Same as details provided in A1

Name:

Address Line 1:

Address Line 2:

Address Line 3:

Address Line 4:

Postcode:

Telephone number:

Not Answered

Email address:

Resident, Parish/Town Council

Other:

Any further updates about Strategic Waste or Minerals Planning in West Sussex

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Part C - Issue 2

2a Do you consider that all reasonable alternatives for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Minsted West, Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

Dear Sir/Madam

I am writing to you not only as a resident of Midhurst but also as the caretaker for Midhurst Cemetery.

It has come to my attention that yet again Severals East and Severals West are being considered for sand extraction, which, in earlier surveys/consultations proved to be totally unsuited for these sites.

Midhurst Cemetery is a beautiful and quiet cemetery which many people like to come and visit, not only just to say hello and tend to their late relatives and friends graves, but to sit and enjoy the quiet and solitude. We have had people totally unconnected to Midhurst ask to be buried here as it is such a lovely cemetery, some from afar as Dorset to the Midlands!

I have to say to you that Severals East is just a 2 minute walk away from Midhurst Cemetery and a 5 min walk from Severals West. The noise and pollution that a sand quarry would generate would severely impinge on the residents of Midhurst wishing to visit their relatives, as well as loved one's. It would definitely impinge on any funeral service held at the graveside. and the dust also generated would be horrendous when the wind is in a certain direction.

Then there is the environmental damage: over recent years much hard work has gone into creating a wildlife corridor from Midhurst to the other side of Iping. If the extraction were to go ahead this would sever that corridor and put all the previous hard work to waste, decimating the wildlife and local flora and fauna, which in places has taken many, many years to establish.

There is also the pollution to take into consideration too, from all the trucks and associated machinery that is necessary to extract the sand. Both audible and particulate. Severals road is tiny and is a one track lane for large parts of it and is totally unsuitable for large heavy HGV's or any other heavy machinery.

All of this, roughly a mile from the Heart of the South National Park!

Severals common (East and West) have been enjoyed by hikers, dog walkers, cyclists and the general public for many many years because of its beauty and it's closeness to Midhurst.

To dig it all up would be an absolute disaster for Midhurst, The National Park and its surrounding beauty!

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

Part E - About You (The Equality Act 2010)

More questions About You

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Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-03-14 09:47:14

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

A2 Client Details if applicable

Title:

First name:

Last name:

Job title (where relevant):

Organisation or affiliation (where relevant):

A3 Contact Address Details

Not Answered

Name:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Email

Email address:

[REDACTED]

Non-Government Organisation

Other:

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Part C - Issue 2

2a Do you consider that all "reasonable alternatives" for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

From the Ramblers perspective we have no issue with the process you are undertaking for the extraction of soft sand.

The objection of The Ramblers is to the potential loss of woodland and the network of footpaths within the Severals area. The footpath network is a treasure and the woodland provides a wonderful environment for wildlife. The footpaths themselves are used as interconnecting paths between Stedham Common and Midhurst, also Minstead to Midhurst and Cocking Causeway. We do not see any provision in your plans to offer alternatives. The whole area around the Severals area will be a 'no go' area for footpath users. The increase in HGV traffic in Severals lane will further preclude any walker access for safety reasons.

To conclude; The Ramblers object to sand extraction quarries in Several east and West.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

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8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

Part E - About You (The Equality Act 2010)

More questions About You

Age

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

Not qualified to answer this.

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

Not qualified to answer that.

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Not qualified to answer that

Part C - Issue 2

2a Do you consider that all "reasonable alternatives" for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

Not qualified to answer that

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

No

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

Not qualified to answer that

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

No

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

Too little attention to the traffic aspects of the extraction process.

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

1. Seems to lack detailed understanding of the depth of sands and the levels of groundwater.
2. Major impact on a well established walking route (Serpents Way)
3. Inadequate attention to lorry access and exit route, number of lorries per day, working hours, weekend working?. Nor does it seriously deal with the destination of those lorries except for some concern about AQMA areas in Chichester area.
4. In the southern end noise will be a serious problem for Bepton residents.
5. The southern end of the Severals East area is impracticably narrow for extraction without disruption to the Severals Road.
6. The rehabilitation proposals for the ground are very sketchy without knowledge of groundwater levels. Rehabilitation could take years, especially if infill with inert materials are involved.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

Apart from the above No.

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

Not qualified to answer that.

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

Part E - About You (The Equality Act 2010)

More questions About You

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[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]

To:

PL MWDF

Subject:

Durham Council - Soft Sand Review - No comments

Phone call from Durham CC @ 10.30AM, 29/01/2018 – confirming that they have no comments on the soft sand review.

Previous contact with Durham CC during prep of JMLP re. Silica Sand.

Record as a response.



Campaign to Protect
Rural England, Sussex Branch CIO
Brownings Farm, Blackboys,
East Sussex, TN22 5HG

Planning Services (Ref. SSR)
West Sussex County Council,
County Hall,
Chichester,
West Sussex,
PO19 1RH

18th 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) 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).

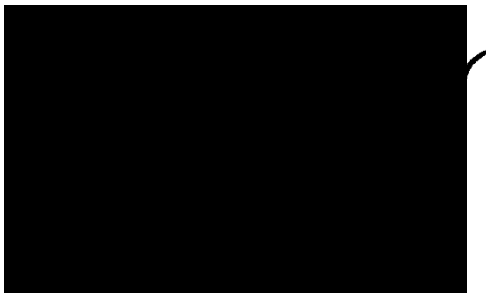
Accordingly, none of the 'potential sites' are acceptable to CPRE Sussex 'in principle'.

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,



Soft Sand Review of the West Sussex Joint Minerals Local Plan - Issues and Options Consultation

Thank you for consulting East Sussex County Council (ESCC) and Brighton & Hove City Council (B&HCC) on the Soft Sand Review of the West Sussex Joint Minerals Local Plan. This response represents Officer views on behalf of ESCC and B&HCC as minerals planning authorities.

Context

ESCC and BHCC work jointly with the South Downs National Park Authority (SDNPA) on waste and minerals planning policy documents. Our adopted joint plans are the Waste and Minerals Plan 2013 and the Waste and Minerals Sites Plan 2017, which together make up the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan (WMLP).

The overall picture of aggregate supply to our Plan area is of heavy dependence on imports by road, sea and rail. Significant levels of marine imports (marine dredged and crushed rock) are received through Shoreham Port and to a lesser extent Newhaven and Rye, although imports to Newhaven are likely to increase given recent developments that have been permitted. Crushed rock, recycled aggregate and sand and gravel are imported by rail at Newhaven. Land-won sand and gravel is currently extracted in the east of the Plan area at Lydd Quarry. A steady supply of recycled material is produced from construction waste management facilities across the Plan area.

As you will be aware, we are currently carrying out a Review of the WMLP. The principal reason for the Review is that, following the Examination into the Waste and Minerals Sites Plan in 2016, it has been identified that the provision of aggregates contained in the WMLP for the plan period will be insufficient. The Review will look at how the WMLP can provide for a steady and adequate supply of sand and gravel and how this provision will be made. Evidence for the Review will include a study of the supply chain for construction aggregates in the Plan area, including for soft sand.

The evidence available to us now suggests that a proportion of aggregates produced or received in West Sussex are imported to serve the East Sussex/Brighton & Hove market including soft sand. We note that this is acknowledged in the latest West Sussex LAA. Our comments on the Soft Sand Review are therefore made in the context of how future provision of soft sand in West Sussex/SDNP impacts on import requirements to assist the constructional needs of the East Sussex/Brighton & Hove Plan area. It should be noted that whilst East Sussex may rely on imports of aggregates, it does contribute considerably to exports of gypsum and clay products to a much wider market. Hence the cross-border imports/exports of minerals that are found in other areas must be recognised and acknowledged in the Soft Sand Review.

Soft sand

There is a shortage of this specialist building material and along with other authorities in the South East, ESCC and B&HCC signed a Statement of Common Ground (SoCG) in 2017 to enable joined up working on provision of this mineral. We understand that this statement is currently being adapted to provide a position statement as a framework for more detailed SoCG between authorities. As you will be aware, ESCC and BHCC, along with other neighbouring authorities, have been working to produce such a statement on soft sand.

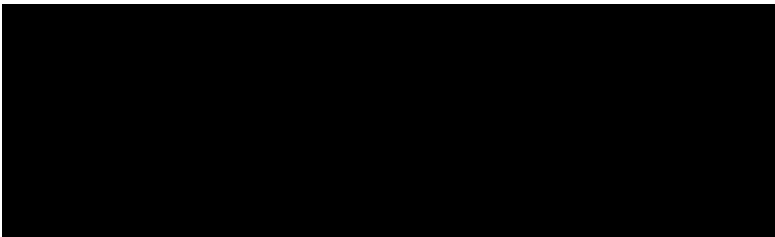
The Review of the WMLP will look at aggregate provision and this will include soft sand. All of the soft sand resource in our joint Plan area is located entirely within the South Downs National Park. There is one permitted soft sand site within our Plan area (Novington Sandpit/Stantons Farm) located within the National Park, although this has not produced any mineral for some years now. There is no soft sand resource elsewhere within East Sussex outside of the National Park.

Because of the particular situation with regard to the location of soft sand sites (outlined above) we know that for at least 5 years East Sussex and Brighton & Hove has been *wholly* reliant on imports of soft sand. We are looking further at the supply chain for soft sand as part of the Review. From informal study so far we have determined that East Sussex and Brighton & Hove depend on soft sand imports from adjoining counties, including from West Sussex and Kent, and this provision has been made without difficulty or any issues. From a mineral planning perspective we would therefore aim to secure an adequate and steady continued supply from these sources as far as we are able.

On a related matter, you will be aware that the draft Kent Minerals Sites Plan has identified a surplus of soft sand for the wider regional need. Whilst we wish to see a greater amount to be identified, the recognition of the need to provide for the requirements of other mineral plan areas is strongly supported.

The issues inherent in identifying further soft sand sites in the West Sussex /National Park Plan area are stated in the SSR consultation document, and the likely shortfall in provision is noted. It is assumed that the 10 year figures used to predict provision include sales that will have been exported to East Sussex/Brighton & Hove. It also seems that the demand scenarios used to plan provision have incorporated growth assumptions for constructional materials in East Sussex and Brighton & Hove, although confirmation of this would be appreciated.

Whilst we would wish to see the soft sand supply from West Sussex and the National Park to our Plan area continue, the problems involved in seeking sufficient amounts for the future are understood. Similar issues will need to be considered as part of our Plan Review. However, East Sussex and Brighton & Hove would not support any approach by West Sussex/SDNP for future soft sand provision which sought to make up the shortfall of need from other Plan areas, to the detriment of our own acknowledged and evidenced supply from other Plan areas.



**Planning Services (Ref. SSR),
West Sussex County Council,
County Hall,
Chichester,
West Sussex,
PO19 1RH;**

Date: 07/03/2019

Dear Sir/Madam,

**Soft Sand Review of the West Sussex Joint Minerals Local Plan;
Issues and Options Consultation (Reg.18)**

Thank you for consulting Central Bedfordshire on the Soft Sand Review. As you are aware, our key interest in your Minerals Plan previously, has related to Silica Sands, which, although closely related, do not feature in the current consultation.

We therefore only wish to offer a few general comments in response to the questions on options as follows.

Question 2A. The Consultation Document appears to consider all of the relevant options and we have nothing to add.

Question 2B. Whilst we appreciate the difficulties faced by the joint mineral authorities, it needs to be recognised that the inability to satisfy demand within the Plan Area, would have a knock-on effect on neighbouring authorities and even further afield. Whilst there may be substantial reserves elsewhere not constrained by National Park, there may be other factors that make these difficult to release. There is also a need to consider the transportation and related environmental impacts compared with working minerals close to market. If it is determined that building sand provision should be made entirely or partly from outside the Plan Area, this should identify specific Mineral Planning Authority areas, and should be by agreement with those authorities, in order to ensure the adequacy of permitted reserves and thus avoid unexpected repercussions that might affect the balance of supply and demand across a much wider area.

Question 2C. We would not wish to prejudge the conclusions to the study

I hope these comments are useful.

Yours sincerely,

A handwritten signature in black ink that reads "Michael R. Abbott". The signature is written in a cursive style and is underlined with a single horizontal stroke.

Mike Abbott

Principal Planning Officer



WEST SUSSEX SOFT SAND REVIEW: ISSUES AND OPTIONS

Please complete and return this form to Planning Services, West Sussex County Council, County Hall, Chichester, PO19 1RH by **18 March 2019**. Visit our website for further information: www.westsussex.gov.uk/mwdf.

Data Protection/Privacy: West Sussex County Council is registered as Data Controller(Reg. No. Z6413427). For further details and information about our Data Controller, please see www.westsussex.gov.uk/privacy-policy.

PART A: PERSONAL INFORMATION

A1. Personal Details

Name

Job Title (where relevant)

Organisation or affiliation (where relevant)

A2. Client Details (if applicable)

If you are completing this form on behalf of someone else then please provide details of the person(s) or organisation you represent.

Name

Job Title (where relevant)

Organisation or affiliation (where relevant)

A3. Contact Address Details

Please provide details of the person who should be contacted regarding this response

Address

ROWANS
STEDHAM
MIDHURST, GU29 0QJ

Telephone

Email

Preferred Method of Contact

Post

Email

Please tick all categories below that most adequately describe you.

- | | | |
|---|---|--|
| <input type="checkbox"/> Resident | <input checked="" type="checkbox"/> Parish/Town Council | <input type="checkbox"/> SDNPA Member |
| <input type="checkbox"/> Local Business | <input type="checkbox"/> District/Borough Councillor | <input type="checkbox"/> Government Organisation |
| <input type="checkbox"/> Minerals or Waste Industry | <input type="checkbox"/> County Councillor | <input type="checkbox"/> Non-Government Organisation |
| <input type="checkbox"/> Landowner | <input type="checkbox"/> Local Authority | <input type="checkbox"/> Other (please specify) |

If you submit a consultation response, your contact details will be used to automatically notify you of updates with regards to the soft sand review and minerals and waste planning policy. Please tick the appropriate box if you **DO NOT** wish to be notified of the following.

- Progress and consultation on the Soft Sand Review
- Any further updates about Strategic Waste or Minerals Planning in West Sussex

West Sussex Soft Sand Review: Issues and Options

Summary of Key Points of Response

The suggestion that quarrying be allowed at Severals East and West and Minsted is ill conceived given the local sensitivities. The Soft Sand Review has failed to demonstrate demand or adequately assessed existing sand resources. In addition, there is no demonstration of the exceptional circumstances required for mineral extraction within a National Park. Given this, and the conclusions of the MLP Inspector that exceptional circumstances do not exist at present, further investigation needs to focus on potential marine and other reserves and there is sufficient time to do this if exceptional circumstances were to arise in the future. As this is a National Park, further discussion has to look at the conclusion that West Sussex must continue to export to other counties but is restricted from importing sand from other areas.

1. Guidance on preparation of Local Area Assessments is issued by the Mineral Products Association which seems like a conflict of interest.
2. There is no evidence to support a 26% increase in new house building which drives the subsequent demand.
3. Similarly, the resource availability estimates are not supported by facts (e.g. proper reserve estimates for existing sites) and do not even include all the existing quarries present in West Sussex so estimates of available reserves are incorrect, inaccurate and underestimated.
4. The MLP Inspector's report seems to be based on the fact that any requirements for soft sand from within West Sussex have to be sourced from West Sussex and the county could not rely on imports from other counties to make up the estimated shortfall. At the same time he concluded that West Sussex must continue existing exports to other counties. These exports would probably add up to the shortfall identified even with the overestimated demand. It seems counter intuitive and unfair to continue exports but refuse imports.
5. This is a National Park. It was defined as such because it was felt that the area should be set aside for the nation. To then try to limit sand reserves to within the park to support West Sussex alone seems to be completely in conflict with the purpose of national park designation.
6. As a National Park, mineral development should only be allowed in exceptional circumstances. We have seen no evidence that exceptional circumstances have been demonstrated. Even the MLP Inspector concluded that exceptional circumstances do not exist now but may exist in the future. What might happen in the future does not seem to be an effective basis for policy.
7. Large amounts of money have been spent to restore and improve the Severals heathland (estimated to be £300,000 to Cowdray Estate and £2.47 million to Heathlands Reunited). The heathland is the key habitat that was the reason for including the area in the National Park.
8. Removing the sand destroys the heath. It cannot be restored and the suggestion in the assessment that restoration to an area of broad-leaved woodland interspersed with ponds is a completely absurd suggestion making a fake habitat that does not fit within this heathland corridor and the SDNP Heathland Reunited programme. We also know from nearby Minsted and Cocking (on Cowdray Estate land) that the government agencies appear to have no authority to enforce breaches of planning consent such as a failure to implement restoration plans.
9. The assessment of protected sites is being undertaken on an individual site basis without consideration of the interdependency between and among sites. The Severals area has been

identified as an important corridor linking many of these sites but in particular the SNCI's at Midhurst, Stedham and Iping with those to the east at Ambersham and Graffham

10. Severals East and West have been used as an amenity area by the people of Midhurst for over 150 years as documented in books written on the history of Midhurst.
11. The assessment has not included consideration of impacts on the water table, one of the key problems identified from activities at the nearby Minsted quarry.
12. We have estimated that sand extraction will require between 150 to 180 lorries per day over a 5 year period and 75 to 92 lorries per day over a 10 year period. That would be up to 370 lorry movements per day. The local roads cannot take this additional load. There are already large numbers of aggregate lorries using the A272.
13. Midhurst is about to be designated as an AQMA given the poor air quality. As an AQMA, plans must be put in place to improve air quality. This number of vehicles will result in even worse air quality and make any efforts to improve air quality futile. To get south to the A272 would require passing through an AQMA at Chichester and there are very narrow roads through Trotton and Rogate to the west.
14. The Severals is home to a wide range of rare and protected wildlife and plants such as Nightjars, Smooth Snake, Adder and Sand Lizard. There has been particular recent emphasis on improving the habitat and transit corridors for these species.
15. No consideration has been given to noise impacts. When the sand quarry at Minsted is operating noise can be heard more than 2 miles away.
16. Designation of 'Dark Sky' status for this region may also be impacted by vehicle, plant and associated road infrastructure development necessary for the process – particular on the A272.
17. The assessment suggests that impacts on local housing (specifically Severals House) could be mitigated. This illustrates the lack of thought put into this process. The identified areas completely surround the property boundaries of Severals House. If this continues, Severals House and others will be severely impacted and no mitigation will be sufficient.

Details on all of these points are provided below.

PART B: ISSUE 1

Question 1A: Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

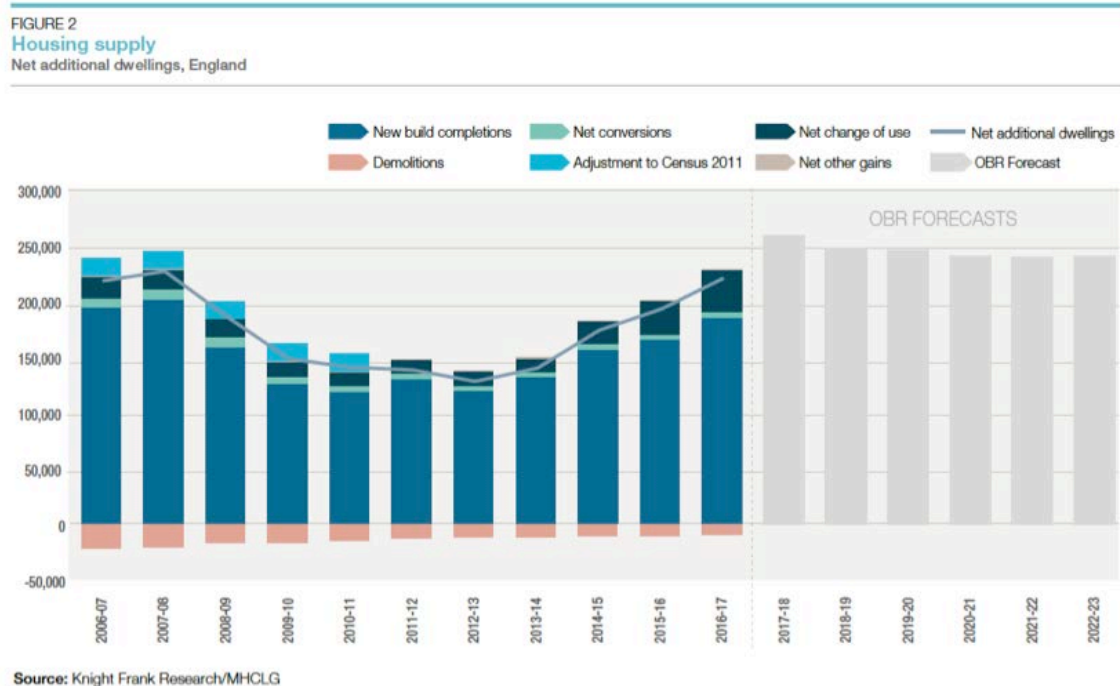
1A-1 House Building Forecast Overestimated

The demand scenarios are completely unrealistic and not based on facts. The scenarios predict a 26% increase in new house building which is based on potential sites identified from local plans. We have been unable to find any statistics or forecasts for actual or predicted new house building starts that come anywhere near this growth rate. With up to 94% of sand exported out of West Sussex (see comments in following section), using growth scenario of 26% based on new housing demand in West Sussex bears little correlation with demand.

Long term local forecasts are difficult to find but the Office for Budget Responsibility forecasts predict no increase in new house building nationally until 2023. In 2014 the Department for Communities and Local

Government forecast house building in England would remain steady at 210,000 per year until 2039. A recent report showed growth from 2016-17 to 2017-18 to be only 2%. Although 2017 was supposed to be a very good year with new builds in England up 13% forecasts predicted new home starts would be down 6% in 2018 and were predicted to drop by a further 2% in 2019 followed by an increase of 3% in 2020.

A recent House Building Report from 2018 reported that new houses reached 257,600 in 2017/18 (an increase of 18%) but the OBR expects this to fall by 7% in 2018/19 and then remain steady at that level. The report specifically states that maintaining the 2017/18 figures “would be a challenge”.



All of these estimates are well below the 26% growth used in the LAA and if maintaining an 18% growth is a challenge then even achieving let alone maintaining a 26% increase would be very difficult indeed. The 26% may be what has been identified as potential within local plans but it is nowhere near reality and would appear to be impossible to achieve in practice.

In order to use any of the scenarios we think there needs to a better forecast of predicted house price starts and/or an assessment of whether a 26% increase in building starts would be sustainable let alone possible. We expect there are actual house start forecasts available that would be more appropriate. Identifying the available land to build on is not the same as actually building those houses.

1A-2 Resource Availability

How up to date are the resource assessments? It does not appear to be possible to independently verify the current reserves. This makes it rather difficult to assess whether they are realistic. Table 6 of the LAA provides a list of currently permitted quarries but does not provide reserve estimates. We understand that operators of current sand quarries keep the reserve estimates confidential. Why is that and how are we to effectively assess requirements if they refuse to release reserves estimates? Other extractive industries, such as oil and gas production, have to be open about reserves. We fail to see how this plan can be in any way meaningful without publicly available reserves estimates.

Question 1B: Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

1B-1 Future Soft Sand Requirements

A recent report by the UK Independent Committee on Climate Change (UK Housing: Fit for the Future? Feb 2019) concluded that government targets for greenhouse gas emissions would not be met without widespread changes in housing construction practices. One of the specific findings was the need to improve the focus on reducing the whole life carbon impact of new homes by increasing the use of wood in construction and reduce high carbon materials such as cement and concrete. They recommend the implementation of new policies to change the way houses are built. These changes could significantly impact the requirements for soft sand in the long term.

No economic environmental value is placed on where the sand is sourced so the 'cost' is the same if it is sourced from a National Park or as marine dredged sand.

Question 1C: Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/ evidence to support your view.

Yes. The demand curves seem too high. It is also difficult to see how the shortfall has been identified and there seem to be inconsistencies in the findings of the LAA that we cannot reconcile.

The West Sussex LAA Dashboard 2018 table at the end of the Executive Summary shows that West Sussex has a landbank for soft sand of 7.4 years and may be as much as 9.4 years (Para 2.1.20). As the requirement is for a landbank of at least 7 years this would seem to be adequate (although the MLP inspectors report seems to be suggesting that "at least" means "more than"). However, Table 21 suggests that there is a demand of approx. 5.6 mT and reserves of 2.75mT. So where did the 7.4 years landbank come from and why is it different from the demand/reserves estimates provided later in the report? We also note that these numbers are different from those shown in MM21 of the MLP Inspector's report which suggests a landbank of 10.7 years which is well over the 7 year landbank required.

The summary table on soft sand (page 22) concludes that an additional 1.66 – 2.83mT is needed over the period of the plan to 2033. The next section highlights that West Sussex is a net exporter of 1.82mT. Elsewhere in the report it states that most of these exports are to the London area. The MLP Inspectors report

criticises the previous assessment for assuming imports from Kent and Oxfordshire including potential impacts from lorry traffic. And yet this report appears to consider that continued exports to London from inside a National Park with its associated traffic along much busier routes are acceptable. In addition, the impacts of lorry traffic to London would probably be higher given traffic issues and potential Air Quality Management Areas along the route.

In addition, the large range of numbers used for planning is derisory, e.g. exports range from 42,400 – 275,600mT (14% to 94%) of the quoted demand forecast of 293,737mT. As such, proper conclusions cannot be drawn and does not justify the environmental harm to the landscape. The industry cannot hide behind ‘confidentiality reasons’ for not producing more accurate data. If the Industry were made to pay the true cost of damage to the environment, this ‘justification’ would never be accepted – the SDNPA should lobby accordingly.

1. With up to 94% of sand & gravel being exported out of West Sussex there is no correlation with house building in West Sussex as a driver for growth in demand.
2. The data does not support the inspector’s statement (para 30) about the ‘strategy to rely on imports from surrounding authorities’, indeed the opposite is true.
3. Para 31 of the inspector’s report recognises the ‘significant adverse effects in terms of transport’ yet up to 27% of the sand gravel is being exported as far as Buckinghamshire that borders Oxfordshire.

PART C: ISSUE 2

Question 2A: Do you consider that all 'reasonable alternatives' for soft sand supply have been identified or are there other options that we should be considering?

Note Question 1A response on reserves remaining in the existing sand quarry at Minsted and accuracy of other reserve estimates. Further work needs to be done on a more accurate assessment of current reserves and potential marine reserves see 2C below.

Question 2B: Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

References made throughout comments.

Question 2C: Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

The only reasonable option is E – a combination of alternatives (marine dredged), supplies within West Sussex and supply from outside West Sussex.

As the Campaign for National Parks says:

“National policy should be based on an approach which places a greater emphasis on encouraging more efficient use of minerals including managing demand for new minerals, recycling, use of appropriate alternative products and significantly reducing waste in construction.”

The preferred strategy needs to reflect this and include:

1. Accurate demand estimates based on building starts

2. Accurate estimates of reserves within existing quarries – which we do not have, have not been provided or appear to be commercially confidential
3. Consideration of future improvements in building practices (see recent comments to Q 1B) with particular reference to timber frame house building
4. Review of existing practices e.g. why mortar manufacturers in the southeast do not use marine won sand when it is used in other parts of the country (see LAA 2.2.9)
5. Balance of imports and exports from each county
6. Aggregates exported to other countries (of the 15 mT of marine landings over 5mT is exported to Europe)
7. Other areas raised by the CNP including alternative products, recycling and reducing waste

As far as we can see the LAA has taken some unsupported numbers and immediately leapt to the conclusion that more new quarries are required.

There are other sources that have not been properly considered.

Option D - Marine provides the least environmental impact and the most reasonable sustainable solution.

The understanding of the use of marine dredged sands appears very weak with statements in the consultation document such as;

1. 2.2.1 states that marine won sand and gravel is not considered a viable substitute and yet the British Marine Aggregate Producers Association promote the use of marine sand for mortar - https://bmapa.org/documents/marine_building.pdf
2. Para 2.2.9 of the LAA. Mortar manufacturers in the south east may be using marine won sand in the products in place of soft sand. The use of marine won sand is more common in other parts of England,
 1. para 3.20 'it is not known if this material is being blended with other, land-won sand, or is a direct substitute'. This needs to be known!
 2. Para 3.23 states that 'the industry may be turning towards utilising more of this resource'. Why is this not known?

Option C – as stated earlier, the demand data is so poor with potentially 94% being exported out of West Sussex, including 27% to Buckinghamshire, that if the harm from transport is being properly considered then these practices should be discouraged by reducing the amount produced in West Sussex.

A fundamental principle is that a National Park provides the highest level of environmental protection, higher than an ANOB used by other authorities, e.g. Kent and Oxfordshire, to protect their landscape. It was one of the reasons why there was a lobby against the setting up of the SDNPA as it was felt that it would dilute the level of protection from AONBs as now appears to be the risk.

Para 25 of the Inspectors report makes the statement that 'Oxford County Council has noted that soft sand would need to be transported by road over the likely feasible distance and that there is no scope to export soft sand by rail to West Sussex'. As stated, up to 27% is exported to Buckinghamshire that is adjacent to Oxfordshire! And on para 26 – Surrey has deep sand deposits that are not in a National Park.

The focus on supply from within the county boundaries seems to be completely the wrong approach. And yet this approach seems to be the prime focus of this consultation and the previous remarks made by the MLP Inspector. What about those counties that have insufficient resources? Will there be no building in those areas as they do not have sand? There seems to be an inconsistency in expecting the West Sussex exports to continue and yet say that imports are unacceptable.

As stated elsewhere in this response, the inspector said that West Sussex cannot rely on sand imported from other counties but in the same report finds that West Sussex must continue the level of export it currently has. This seems rather hypocritical. If we are going to rely on each county to supply sand locally then we would suggest we stop the 1.8 million tonnes of planned exports from West Sussex and that would make up much of the just over 2 mT shortfall.

It happens that most of the potential sand reserves in West Sussex are within the SDNP. However, it is a **National** Park and has been designated as such based on its uniqueness to the nation as a whole, not West Sussex. Mineral developments can occur in a national park under exceptional circumstances. We fail to see where those exceptional circumstances have been demonstrated other than there are limited reserves in West Sussex outside the park. That is not exceptional when there are significant other local reserves that can be exploited. Marine reserves appear to be under-represented. In addition, the LAA Map (Appendix A) is not very accurate but there do appear to be large reserves of sand stretching north from Petersfield.

The sands are what define the habitat that resulted in the inclusion of this area north of the Downs in the SDNP. To remove the sands would destroy the habitat around Midhurst that defines the SDNP (“Heart of the South Downs National Park”).

We strongly recommend that the SDNPA seek to use this example as a case study on why planning policy for minerals planning needs to be changed to protect national parks and to prevent this from being revisited every few years, causing much distress and cost. The current ‘Julian Glover’ National Park Review provides an opportunity. In addition to the many other points already raised, we would like to add;

1. No ‘monetary value’ is currently placed on the environmental cost of mining in a National Park. The default planning process is to ask land owners to offer up sites. This inevitably leads to the ‘easy’ solution by the Industry without costing the harm to the environment.
2. There appear to be conflicts of interest in that the Mineral Products Association not only write the guidance on preparation of Local Area Assessments but they also sit in the Aggregates working parties. There is no presence of DEFRA on the AWP.
3. Appears lack of joined up Government between Ministry Housing, Communities & local Government and DEFRA to take a national view of these issues.

Question 3: Do you have any comments on the draft Sustainability Appraisal of the Options

There is nothing sustainable about minerals extraction. Once it is removed, it is gone and cannot be reinstated so it is in no way sustainable. What this report and many other reports on sustainability refer to is ensuring efficient operations with impacts as low as practicable.

It would be very helpful if you used the specific title of the document in the question rather than some approximation as it makes it rather confusing. Does this document refer to the “Sustainability Appraisal including Strategic Environmental Assessment – Main Report”? Or some other document perhaps one we have not seen? Or is the document we are referring to apply to question 8 which also refers to a sustainability appraisal? There is also a section titled “sustainability appraisal” in the “Soft Sand Sites Selection Report”. We are going to assume this question refers to the SA and SEA – Main Report.

There are quite a few errors in this report but we will only point out a few as examples:

1. It is full of jargon and acronyms and is certainly not written for public consultation
2. the first sections are repetitive,
3. the tables have been cut off before the text is completed making it illegible (e.g. Table 2.1 on page 9, point 12 in App 1 and elsewhere),
4. the paragraph numbering is incorrect from Section 4 to the end,
5. the section titles described in Section 2.1 Structure of the Report don't match the section headings in the document
6. Table 7.1 identifies Severals East and West as being in Wiston Parish. They are not

The problem is that it does not give me much faith in the quality of the contents.

Specific comments

Section 2, Table 2.1j Suggests a separate non-technical summary has been produced. Perhaps you could provide a reference or link to this. It certainly would be helpful in digesting 139 pages in this report. We have seen there is a non-technical summary from the previous review issued in 2016. Perhaps this is what is being referred to but it isn't clear.

Section 2.1. As stated above, for clarity why not refer to the chapter headings to match the actual headings in the report.

Figure 2.1. We note the key to symbols used here but we notice that at a number of points throughout the report multiple symbols are used, particularly either a + or – with a ?. so what does that mean? If it is uncertain why not just say it is uncertain and not attempt to pre-judge by adding another symbol?

Table 3.2. We find the conclusions made in this table to be rather poorly thought through. The suggestion seems to be that preparation and agreement of the JMLP is going to solve all of the environmental and sustainability issues associated with minerals extraction in West Sussex! Some of the conclusions just don't follow. For example, Point 4 declines in biodiversity. How does preparation of a JMLP help protect biodiversity? Any mineral development would require planning permission and we assume an EIA. A JMLP could help control regional or cumulative effects but we do not see how it has any bearing on site specific impacts once a site is chosen. Similar arguments could be made for a number of the issues raised in this table, just substitute flooding, water quality, air quality etc for biodiversity.

Table 3.2. How can employment in the minerals section decrease in the absence of the JMLP. Some of the sites (e.g. Severals East and West) are proposing to use companies outside of West Sussex so it is possible that it has no effect on local employment. These sites require a relatively small number of people and will have little impact on local employment.

We don't see the point of Tables 5.1 and 5.2. Both tables include statement of the obvious.

We do not find this report to be particularly helpful. We are not convinced that the report in any way meets the requirements of a Strategic Environmental Assessment. We would expect an SEA to identify some of the key environmental hazards that may result from mineral extraction. We do not see this anywhere in the report.

PART D: ISSUE 3

Question 4: Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (ASR)?

According to the Campaign for National Parks most National Park Authorities (NPAs) are Mineral Planning Authorities (MPAs) and are expected to identify areas where mineral resources are known to exist. However, unlike other MPAs, they are not expected to identify areas where planning permission might reasonably be expected (known as Areas of Search or Preferred Areas). So we fail to see how this whole site selection process fits within this framework.

The Issues and Options Consultation sets out 5 site selection principles:

1. Places where there are opportunities to restore land beneficially
2. Places without a sensitive natural or built environment and away from communities
3. Sites that have a good access to the Lorry Route Network
4. The need to conserve and where possible enhance protected landscapes in the area
5. A preference for extensions to existing sites rather than new sites, subject to cumulative impact assessments.

It would have been very useful if the reports assess how each of the sites met these strategic principles. Surely that should be the first stage since these principles were established. We are most interested in the local sites in the parish, Severals East and West, and immediately adjacent, Misted West, and we do not see how they meet any of these principles as described below:

1. Both sites have undergone extensive habitat improvement over the past years with significant sums of money invested
2. Both sites occupy sensitive heathland sites which are one of the key habitat types identified in establishing the boundaries of the SDNP and are adjacent to existing housing
3. A local lorry route is relatively close but access is dangerous, it would be unable to handle what is estimated to be up to 370 lorry movements per day and there are significant restrictions due to road size to the west and AQMA's to the east and south.
4. Removing the sand would completely destroy the heathland habitat with no possibility of conserving or enhancing (the assessment suggests a completely unnatural restoration of broad-leaved woodland and interlinked ponds which is definitely not in keeping with the area).
5. Both are completely new sites with a high potential for significant cumulative impacts.

If the sites do not fit the 5 basic principles then there is little point in going through all of the extended detail outlined in the other reports.

We have provided detailed comments to support these conclusions in the site specific information at the end of this document.

Question 5: Do you have any comments on the nine shortlisted sites identified in the Issues and Options Consultation Document?

Comments provided on Severals East and Severals West attached at the end of this document. These equally apply to Minsted West.

Question 6: Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

Given the impact on landscape character of the Severals and Minsted sites both locally and also from the South Downs, it is hard to understand how any other sites have been ruled out on the basis of 'Unacceptable impact on landscape character' when these have not.

Question 7: Are there any sites that we should be considering that are not included in the Soft Sand Site Selection Report (4SR)?

Yes marine sources and sources outside of West Sussex. See previous comments above.

Question 8: Do you have any comments on the sustainability appraisal of the potential sites?

See answer to Q3.

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 sites?

We have yet to see a demonstration of exceptional circumstances that make minerals development within the SDNP acceptable. What are the exceptional circumstances? How have they been defined? This is the root of the question before the site selection process can continue in any way. The MLP Inspector raised the issue of "exceptional circumstances" but in reopening this review his report stated that "there is the potential, in the future, for exceptional circumstances" (Para 15). That means that no exceptional circumstances exist at present and therefore mineral development in the SDNP is not acceptable. The inspector seems to be going against policy by ignoring the exceptional circumstances criteria for selection of sites within the SDNP. This should be the key requirement before considering mineral extraction within the SDNP.

Site Specific Comments Severals East and West follow. These apply equally to the Minsted West site.

Severals West

		Comments
Restoration options	Potential for heathland and/or broad-leaved woodland restoration with interspersed ponds for nature conservation. Improved public access, linking with Midhurst Common/the Serpent Trail.	<p>Restoration of The Severals to a more natural heathland environment has been underway for a number of years (see detailed comments throughout the document). The current landowner has even stated that the work to restore the environment in the area is “one of the biggest conservation orientated projects Cowdray has done” (Ref Cowdray Estate website).</p> <p>For a number of years the SDNP has been promoting the Heathland Reunited, a project supported by 11 organisations to expand and connect the heathland in the national park. The total project value is £2.47 million part of which will be used to create wildlife corridors. The Severals has been an important part of the project. It seems counterproductive that there tearing up these areas for a sand quarry is now being considered after the cost and effort put into this project and the obvious importance the SDNP gives this given the publicity. This project even receives a full page in the SDNP monthly newsletter for February 2019. The following poster was sited in the Severals in 2014. Does the SDNPA stand by what it wrote?</p>

		<p>The idea that the site could be restored to anything even remotely recognisable as “natural” with “interspersed ponds” as suggested in the assessment is really quite risible. Particularly given what all local residents have seen of the existing sand extraction site at Minsted. A broad-leaved woodland with interspersed ponds is not a natural heathland environment as is currently found across the area and existing conservation efforts have been focused on re-establishing. The purpose of the SDNP should be to maintain and protect the existing environment not manufacture an environment to meet industrial needs.</p> <p>There is already public access linked with Midhurst Common and the Serpent Trail which crosses both Severals East and West so this is not a “restoration” option – it already exists.</p> <p>Very small-scale historical quarrying was undertaken on Midhurst Common. Those sites demonstrate what happens when the soil is removed. The ponds and surrounding area are completely dead. Nothing lives in them and there is only sparse vegetation around them. Removing the sand decreases the biodiversity in the soils, destroys the natural seed bank and makes recovery impossible.</p>
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		Any commitment from the regulator on restoration also seems to be completely baseless. We are well aware from the Minsted site that there seems to be very little enforcement capability as that site is in breach of a wide range of conditions, including restoration commitments but as far as we are aware the authorities are unable to take any action. The site continues to sit in limbo with no action taken.
Site specific information		
Planning		
Extension to exist	One of two sites assesses	
Planning policy	Within Chichester District Rural Policy Area where	
Planning history	Site was not allocated in the JMLP (2018) or the Minerals Local Plan (2003). Site	

	Key Criteria	RAG Score	Comments/Additional Information
Landscape and visual	Within South Downs National Park	Red/Amber	RED given recent conservation efforts and potential for

	Key Criteria	RAG Score	Comments/Additional Information
<p>designations</p>	<p>Landscape Study (LUC, 2011):</p> <p>Although comprising large areas of plantation forest, restricting views into the area and enabling the visual containment of extraction activities within existing tree cover, the site has areas of ancient woodland which reduces the overall capacity of the landscape to accommodate development of this nature without adverse impacts on the habitat value and tranquil character of the area. Whilst the woodland and forestry limit inter-visibility with the surrounding area to an extent, the site forms a link between Midhurst Common, to the east, and the Steadham Common to the west, traversed by dense network of paths and bridleways, including the Serpent Trail. The site therefore contributes significantly to the recreational value of the wider area.</p> <p>The site is considered to have a Medium-High sensitivity and Low-Moderate</p>	<p>Within the South Downs National Park</p> <p>Medium-high landscape sensitivity and a low-moderate capacity for accommodating mineral extraction.</p> <p>Potential for enhancement to heathland/woodland mosaic.</p>	<p>restoration to natural environment.</p> <p>Since the Landscape Study in 2011, a great deal of money and effort have gone into restoration of the heathland area of Severals East and West. Severals East has had work carried out in partnership with the Friends of Midhurst Common and the SDNP to restore the heathland with a Wildlife Improvement Grant from Chichester District Council.</p> <p>In consultation with the SDNP, the woodland has been cut back on both sides of the Severals Road to establish a wildlife corridor to link Midhurst Common with Stedham and Iping Common which will be disrupted by the proposed activities.</p> <p>In addition, The Cowdray Estate has received grants of up to £4,000 per hectare (75 hectares s up to £300,000) from the Forestry Commission to clear rhododendron from the area as part of the Cowdray Estates “ongoing commitment to preserving and enhancing the local area”. A commitment that does not seem in keeping with a sand quarry on the site. The clearing of rhododendron was stated to have a significant impact on The Severals enabling native flora and fauna to re-establish and provide habitats for animals and bird species to include Nightjar and Dartford Warbler. The Cowdray Estate were quoted as saying “Not only has our work enhanced the area, The Severals is now a much nicer place for the public to enjoy walking around.” See figure on last page of document.</p>

	Key Criteria	RAG Score	Comments/Additional Information
	<p>capacity to extraction.</p> <p>Supplement to WSCC Sensitivity Study 2011 (SDNPA, 2015):</p> <p>The site has a Medium-High sensitivity.</p> <p>Severals East and West are together be likely to have significant impacts on access and PROW. The existing use of the land for forestry plantation reduces its overall sensitivity on landscape grounds and to some extent how tranquillity is measured as the woodland is not perceived to be 'natural'. For this reason it has been considered that restoration proposals to heathland/woodland mosaic would be beneficial in the long term provided that sufficient areas of the sites can be restored to land rather than wet restoration with the associated water quality issues that this involves.</p>		<p>Given the efforts to restore the natural environment over the Severals it seems that restoration of the area is already well underway and progress is being made to return the area to a "natural" state. It would be to take a large step backwards to allow extraction regardless of the later restoration plans.</p> <p>Any restoration would not improve the environment as the sand extraction would significantly alter the site, soils and landscape such that it would no longer be sustainable as heathland.</p> <p>The suggestion for landscape enhancement seems to be rather poorly thought through. The suggestion of broad-leaved woodland interspersed with ponds is not consistent the existing or surrounding natural environment (or conservation efforts) and should not even be considered by the SDNP. How is that protecting the heathland environment? Has the assessment included a visit to the existing quarry at Minsted to identify how this conclusion is going to be applied to that site?</p> <p>We note that one of the other sites was discounted because it would be visible from a local high point. Severals East and West would be very visible from Bepton Down. The small cleared area on Midhurst Common adjacent to the site is easily identified from Bepton Down.</p>

	Key Criteria	RAG Score	Comments/Additional Information
			More locally; the view from Sunset Hill looks immediately over the proposed area – particularly as the Cowdray Estate cleared their commercial forest growth to promote the view. Seemingly, more evidence that the landowner considered this a short time ago to be an enhancement to the community which is now invalid.
Nature conservation and geodiversity designations	<p>Severals Bog SNCI (SNCI C105) is situated within the site along the western edge. Even with a buffer strip, the bog habitat could be vulnerable to local changes in hydrology as a result of mineral working.</p> <p>Quaggs Corner SNCI (SNCI C53) lies to the west of this site.</p> <p>The stream to the west, Severals Stream, is a tributary of the River Rother. Buffers may be required to the stream and SNCIs.</p> <p>Area of Ancient Woodland (replanted) located within the north/northwest of the site.</p>	<p>Red/Amber</p> <p>The Several Bog SNCI falls within the boundary of the site and may be negatively affected by the development of the site.</p> <p>High levels of mitigation may be needed to protect the SNCI and the SAC from harm.</p>	<p>RED given interdependency of local sites and previous designation as a wildlife corridor.</p> <p>The assessment of protected sites is being undertaken on an individual site basis without consideration of the interdependency between and among sites. The Severals area has been identified as an important corridor (see comments above) linking many of these sites but in particular the SNCI's at Midhurst, Stedham and Iping.</p> <p>The Area of Ancient Woodland (replanted) is well within the existing area considered by the assessment so it is not clear how that can act as a buffer zone as it is being considered as part of the potential extraction area.</p> <p>See previous comments on mitigation and restoration.</p> <p>Severals East and West are identified as an SSSI Impact Risk Zone.</p> <p>The assessment suggests sediment loading in watercourses will be</p>

	Key Criteria	RAG Score	Comments/Additional Information
	<p>Potential hydrological impacts. Any risk of sediment entering the watercourses which lead into the River Rother would need to be fully assessed and mitigated.</p> <p>HRA 2011:</p> <p>The site lies approximately 6km from Singleton and Cocking Tunnel SAC. There is no scope for adverse impacts on this European site. However, the site includes a watercourse that drains to the river Rother and ultimately into the Arun Valley SPA/Ramsar. There is therefore a potential pathway for sediment impacts so the site has been 'screened in' for Appropriate Assessment.</p> <p>The screening exercise identified that water quality was a pathway requiring consideration due to the potential impact of sediment within close proximity to European designated sites. It was concluded that this site will not have any likely significant effects on the Arun</p>		<p>controlled by conditions but we note that a whole series of planning conditions have been breached at the Minsted quarry and nothing has been done other than to cease extraction. Basically it does not appear that the conditions are very enforceable. One of the conditions that has been breached is the need to commence restoration on the areas of the site not in use but there has been no movement on this and no penalty. So we do not think suggesting anything will be controlled by conditions is acceptable.</p>

	Key Criteria	RAG Score	Comments/Additional Information
	<p>Valley SPA/Ramsar through reduced water flows or quality as the main channel of the River Arun does not form part of the SPA/Ramsar. As such any increase in sediment that might arise from dewatering associated with this minerals site would be subject to such a scale of dilution that its effect on the SPA/Ramsar site would be negligible, particularly since the main channel of the River Arun does not form part of the SPA/Ramsar site.</p> <p>Habitats Regulations Assessment (2015):</p> <p>The HRA (2015) supported the findings of the 2011 assessment.</p> <p>It also noted that sediment loading in watercourses near the site will be controlled by conditions since it is an offence to pollute surface watercourses irrespective of whether they drain to a European site or not. The HRA(2015 concluded that the site will not have any likely effects on the Arun Valley SPA/Ramsar through</p>		

	Key Criteria	RAG Score	Comments/Additional Information
	reduced water flows or quality.		
Historic environment designations	<p>There are a number of listed buildings located within 1km of the site. The closest is 'Badgers', Quags Corner located approximately 0.3km to the west of the site.</p> <p>Woodlands Cottage and Heathbarn farm are also located 0.4 km from the site.</p> <p>There are four Conservation Areas within 2km of the site, Midhurst, Iping, Stedham and Woolbeding.</p> <p>An early archaeological assessment is strongly recommended - as a preliminary to any field evaluation a Lidar survey should be carried out (as this is a wooded site). Evaluation should be undertaken pre-determination and the results made available to consider at the application stage.</p>	<p>Green/Amber</p> <p>The development of the site may cause minor harm to nearby listed buildings, Conservation Areas and archaeological remains in the absence of low level mitigation.</p>	<p>AMBER Historical local significance</p> <p>It is not a designation as such but the use of the area by the public has been well documented for over 150 years.</p> <p>In the 1868, G.D. Wolferston's <i>A Guide Book to Midhurst</i> describes the Severals as being '<i>...laid out as a kind of pleasure ground, and planted with every description of ornamental tree ... It is inexhaustible in walks</i>'. In the early 1900's the local vicar and philanthropist, The Reverend Frank Tatchell, encouraged people to walk the commons and these woods. There is no better evidence for the allure of the Severals in those days than a 1913 Valentine Series postcard. This shows a well managed even aged stand of sunlit pines with a smooth needle strewn path wending its way into the distance. Centre stage and smiling, is a young family – a mother with her baby in its pram, three small daughters and a dog. The scene spells a perfect harmony between forestry and leisure.</p> <p>In a study of the social history of Midhurst Common, Jess Mariner of Heath Barn Farm remembered back to his boyhood in the 1930's. During fine weather people would be out on the rides in their Sunday best. They would like 'to be seen', walking, talking, meeting and amongst the tall trees – a kind of 'promenading in the forest'.</p>

	Key Criteria	RAG Score	Comments/Additional Information
<p>Water environment (including flooding)</p>	<p>Habitat Regulation Assessment 2010/11:</p> <p>Site screened in for Appropriate Assessment:</p> <p>The site lies approximately 6km from Singleton and Cocking Tunnel SAC. There is no scope for adverse impacts on this European site. However, the site does include a watercourse that drains to the river Rother and ultimately into the Arun Valley SPA/Ramsar. There is therefore a potential pathway for sediment impacts so this site has been screened in for further consideration.</p> <p>Appropriate Assessment:</p> <p>Due to the effects of dilution the effect of Severals West on the SPA/Ramsar site would be negligible, particularly as the main channel of the River Arun does not form part of the SPA/Ramsar site. Secondly, it is assumed that sediment loading in watercourses near the site will be controlled by conditions since it is an offence to pollute</p>	<p>Red/Amber</p> <p>The site is near vulnerable water bodies (Severals Bog SNCI) which could be majorly impacted in the absence of a high level of mitigation.</p> <p>A Hydrological Risk Assessment would be required prior to allocation.</p>	<p>RED until further studies of potential impact on Rother and Arun SPA and RAMSAR site completed.</p> <p>Part of the assessment in this section is directed at the identification of local SACs as opposed to the water environment.</p> <p>Potential impacts of the Rother should be a very high priority that does not seem to have been properly assessed at this stage. This is a more significant issue for Severals West than East.</p> <p>We would have thought that this should be a RED given the potential impact on an SPA Ramsar site with the potential to be AMBER following a hydrological and hydrogeological risk assessment.</p> <p>This last line of the key constraints refers to the</p> <p><i>SFRA Update and Sequential Test of Mineral Sites September 2016: Development is appropriate as explained in the "Nature conservation and geodiversity designations" section of this document.</i></p> <p>We note that this document is not available and should be made available if it is to be include in a public consultation.</p> <p>The whole of the area for both Severals East and Severals Wets is</p>

	Key Criteria	RAG Score	Comments/Additional Information
	<p>surface watercourses.</p> <ol style="list-style-type: none"> 1. Flood zone 1(Site borders Flood zone 2/3) 2. Under climate change scenarios (updated February 2016), there is a 50% chance that the western edge of the site could fall within FZ2/3 as river levels could rise by between 10% and 40% during the three time periods (2020s, 2050s and 2080s) 3. Under climate change scenarios (updated February 2016), the adjacent river could rise by between 5% and 40% during the three time periods (2020s, 2050s and 2080s) due to peak rainfall allowances 4. Negligible risk to groundwater flooding (25% at higher risk) 5. Low risk of surface water flooding (5% at higher risk) 6. Groundwater levels likely to be high. Depth of working 		<p>identified by DEFRA as a Drinking Water Safeguard Zone (Surface) Water.</p>

	Key Criteria	RAG Score	Comments/Additional Information
	<p>and de-watering operations will need to be explored and assessed. Would prefer no working below groundwater table.</p> <p>7. Possible Water Framework Directive impacts – drainage to watercourse which drains to Rother to Arun</p> <p>Risk Assessment of the water environment (Qualitative Hydrological & Hydrogeological Risk Assessment) - recommend phase 1 assessment prior to allocation.</p> <p>SFRA Update and Sequential Test of Mineral Sites September 2016: Development is appropriate as explained in the “Nature conservation and geodiversity designations” section of this document.</p> <p>Negligible risk of ground water flooding. Low risk of surface water flooding.</p>		

	Key Criteria	RAG Score	Comments/Additional Information
Air quality	<p>Site not located within an Air Quality Management Area but off site traffic movements will need to be considered in the Transport Assessment.</p> <p>Traffic from this site may pass through the AQMAs in Chichester (A27/A286 Stockbridge roundabout, A286- Orchard St and A285- St Pancras).</p> <p>If traffic would have a negative impact on an Air Quality Management Area, then an Air Quality Assessment would also be required</p>	<p>Amber</p> <p>HGV movements may impact upon AQMAs located in Chichester.</p>	<p>RED given potential traffic issues and the future AQMA in Midhurst.</p> <p>The transport assessment also needs to consider potential air quality issues on other routes long the A272 as not all traffic will travel to Chichester. There are potential issues to the west at Trotton, Rogate, Petersfield and the A3 corridor as well as towards Midhurst and Petworth to the east.</p> <p>The key area is Midhurst as air quality in the Rumbold's Hill area is currently not meeting relevant air quality standards. Monitoring is in progress and the expectation is that this will be identified as an AQMA in the very near future.</p>
Soil quality	<p>Mainly Grade 4 therefore no significant loss of BMV agricultural land (although the site also contains a small area of Grade 2 and Grade 3 agricultural land).</p>	<p>Green</p> <p>The site contains low quality soil.</p>	<p>RED sand removal would result in complete destruction of the heathland habitat. The assessment cannot simply be based on agricultural value.</p> <p>This appears to be a rather simplistic conclusion. Soil is not only of agricultural value. The sandy soil of the heathland is what makes the area unique and defines the heathland habitat and has been a key criteria for inclusion of the heathland within the national park. To assess the soil in terms of its agricultural quality alone misses the whole point of the park designation. Removing the sand also has a significant impact on biodiversity as can be seen from historical quarries in the area which, after decades, have not</p>

	Key Criteria	RAG Score	Comments/Additional Information
			recovered.
Public rights of way	<p>Footpath 3619 loosely follows the western boundary of the site before turning eastwards along the southern boundary. A number of permissive paths run through the site, one of which forms part of the Serpent Trail.</p> <p>Existing PROW recorded immediately adjacent to any site are to remain accommodated on their legal line and are not to be disturbed, obstructed or public access deterred. Where it is proposed that material is to be extracted or deposited adjacent to these paths, such works are not to be undertaken within 20 metres of the PROW in order that there will be no future subsidence or slippage to cause the PROW to fall away, or spread of material to cause deposition on the PROW.</p> <p>Opportunities to enhance future public access will be pursued by the PROW Teams through any future planning application</p>	<p>Amber</p> <p>The site contains permissive footpaths and a number of footpaths close to the boundary of the site.</p> <p>Mitigation measures such as a stand-off between the extraction area and the footpaths may be needed.</p>	<p>RED – limited access to an historical area for public access</p> <p>The area is well established as an important amenity area. As well as the Public footpaths there are a number of footpaths identified as areas with agreed public access across the site. As the site boundary takes up the entire Several woods this would severely restrict access to quite a large area with few alternatives.</p> <p>In addition, the noise from extraction activities would result in a significant impact on the amenity value of the area.</p> <p>Opportunities to improve access would appear to be very limited as currently there is access across the whole site.</p>
Transport and	Transport assessment 2015:	Amber	RED as safe access to the site for that number of vehicles is not feasible.

	Key Criteria	RAG Score	Comments/Additional Information
access	<p>The overall acceptability of the site is currently assessed as Low/Medium</p> <p>Access to the site via Severals Road is inappropriate for HGV traffic due to the narrow width, steep gradient and road alignment.</p> <p>Alternative access arrangements include:</p> <ol style="list-style-type: none"> 1. Direct access onto the A272 (this may be difficult to achieve due to level differences between the site and the road and a road safety audit would be required), 2. Access via lane crossing Woolmer Bridge. Road would require widening and resurfacing. <p>Further detailed analysis would be needed to conclude which access arrangement is the most suitable.</p> <p>The results of the cumulative impact of the development of all three sites (Severals West, East of West Heath Common and Minsted</p>	<p>The site poses a moderate risk of causing harm – and would be dependent on which access arrangement is used.</p>	<p>Access to the Severals Rd is not credible. The Severlas Rd is a small single track village lane with restricted access through a sunken lane to the A272.</p> <p>Any access to the A272 will be extremely dangerous given the speed and volume of traffic.</p> <p>The transport assessment also needs to consider issues on other routes long the A272 as not all traffic will travel to Chichester. There are potential issues to the west at Trotton and Rogate where there is restricted space and similarly at Petworth to the east. Local residents already have fears arising from existing aggregate lorries operated by Inert and Dudman which travel at some speed through the area.</p> <p>Recent air quality monitoring has found that the centre of Midhurst is one of the three worst areas for air quality in West Sussex. Further monitoring is almost complete but it is expected that some areas will be identified as an AQMA.</p> <p>The assessment suggests a sequential development. No estimate has been made for how long it will take to work each site but if we look at 4 million tonnes for the two sites and assume 20 tonnes per lorry that will be between 200,000 and 240,000 lorry loads. Over a 10 year period and assuming 261 working days a year that would be between 75 and 92 lorries per day – double that over a 5 year period. That would be up to 370 lorry movements per day. That is</p>

	Key Criteria	RAG Score	Comments/Additional Information
	West) on the A272 is not expected to be severe.		not even remotely feasible for both traffic impact and local air quality.
Services and utilities	To be identified using evidence provided by utility/service providers	Green Based on the information currently available- there are no services or utilities near to, or within the site.	No comment
Amenity	Severals House is located to the east of the site along Severals Road and residential properties to the south of the site.	Red/Amber The site is in close proximity to residential properties and as such the site may cause disturbance (noise, dust and light) to local residents. Mitigation measures should be adopted to reduce the risk of harm.	RED/RED To suggest that mitigation measures can be introduced to reduce the impacts on Severals House is rather absurd. Severals House would be an island surrounded by an area designated for sand extraction. There is no possible mitigation for the impact that would cause.
Cumulative impact	There is a history of mineral working in close proximity to the site. Landscape Study (LUC, 2011): With the proximity of the existing extraction site to the northwest,	Red/Amber The site may cause considerable harm due to its proximity to other developments (Minsted quarry). For this reason it may be necessary to	RED given existing activity in the area and potential for development of multiple sites. Cumulative impact with the proposed joint development with Severals West would be very high if sites were developed simultaneously or separately. In addition, the site at Minsted currently has consent to extract sand until 2041 and although it is currently suspended there is the intention for extraction to start

	Key Criteria	RAG Score	Comments/Additional Information
	there is potential for cumulative effects on the special qualities of the wider Wealden Farmland and Heathland Mosaic character area within the SDNP.	delay mineral working at the site until other sites in the area are completed.	again. If active at that same time as either of the Severals sites or the Minsted extension that is also under consideration in this process then the traffic implications alone would be significant. Lorry traffic from the Minsted site is very noticeable when it is active. Similarly when active, noise from the Minsted site is a real problem and we have issued complaints in the past. Multiple sites would exacerbate the problem in an area where there is very little baseline noise. Cumulative impacts would also result from many of the other issues raised above.
Airport safeguarding	Not applicable	Green The site is not within an Airport Safeguarding Zone.	No comment

Key Issues/ Constraints	Comments
<ol style="list-style-type: none"> 1. The site is located within the SDNP. 2. The overall acceptability of the site in terms of access and transport is assessed as Low/Medium (Transport 	Landscape – there have been significant efforts recently to return the Severals to its natural heathland environment. This has taken considerable cost and effort and it would be short sighted to then undo all of the successful efforts of the past few years

<p>Assessment 2015).</p> <p>3. Medium-high landscape sensitivity and a low-moderate capacity for mineral extraction.</p> <p>4. The site is likely to have significant impacts on access and PROW. The existing use of the land for forestry plantation reduces its overall sensitivity on landscape grounds and to some extent how tranquillity is measured as the woodland is not perceived to be 'natural'. For this reason it has been considered that restoration proposals to heathland/woodland mosaic would be beneficial in the long term provided that a sufficient area of the site can be restored to land rather than wet restoration with the associated water quality issues that this involves. The site contains Severals Bog SNCI (SNCI C105) along the western edge. Even with a buffer strip, the bog habitat could be vulnerable to local changes in hydrology as a result of mineral working. Further assessment of groundwater issues is required.</p> <p>The site could have a negative impact on a small number of adjacent residential properties.</p>	<p>Noise potential noise disruption has not been considered. Particularly if multiple sites are operational.</p> <p>Access/Amenity – it is a significant area for amenity use not limited to the formal Public Rights of Way. The way this assessment is worded, it seems that diversion of footpaths seems to be just assumed as a given.</p> <p>Severals House – the impact on Severals House would be severe and completely unavoidable. The assessment suggests it “<u>could</u> have a negative impact”. It definitely will have a large negative impact.</p>
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Other issues

Noise

No consideration has been given to noise issues associated with sand extraction. As residents of the area know, existing sand extraction at the Minsted site can be heard well over a mile away. The proximity of the proposed site to housing and amenity areas will result in significant noise impacts over a large area, particularly if multiple sites are given consent. The existing site at Minsted has consent until 2041 although operations are currently suspended due to not meeting some consent conditions.

Wildlife/Vegetation

The assessment does not appear to address specific wildlife concerns. The South Downs is home to the only heath in the country where you can find all twelve of our native reptiles and amphibians. Including the **Natterjack Toad, Sand Lizard and Adder** (SDNP Website). Other sensitive species present in the SDNP heathland include:

1. **Silver studded blue butterfly** which has “undergone a major decline in numbers during recent years, mainly due to heathland habitat restrictions. It can be found in good numbers on sites across the project area. However this butterfly rarely flies any distance, sometimes moving less than 20m in its lifetime” (SDNP website).
2. **Nightjars** have also declined in numbers since the 1980’s and as noted above, part of the restoration of the heathland already undertaken at the Severals was to encourage nightjar to the area. Anecdotal evidence from locals suggests that this is starting to prove to be successful.
3. **Woodlark** also nest in low and open heathland vegetation.
4. **Badger** setts (protected in the UK under the Protection of Badgers Act, 1992, and the Wildlife and Countryside Act, 1981) are found throughout the Severals and are followed by some of the local conservation groups. . We understand from local badger protection groups that workers on the Severals destroyed a badger sett despite being warned on numerous occasions that it was present and after agreeing not to work in the area. Unfortunately the police investigated but did not prosecute. So we do not hold out much hope of any further measures to protect badgers in the area.
5. **Raven** have been breeding in the Severals and they were extinct in Sussex for over a century
6. Scarce bog plants - Marsh Valerian, Marsh Violet, Round leaved Water Crowfoot, Bog Pondweed, White Sedge and the fungus Bog Beacon

Severals East

		Comments
Restoration options	<p>Potential for heathland and/or broad-leaved woodland restoration with interspersed ponds for nature conservation.</p> <p>Improved public access, linking with Midhurst Common/the Serpent Trail.</p>	<p>Restoration of The Severals to a more natural heathland environment has been underway for a number of years (see detailed comments below). The current landowner has even stated that the work to restore the environment in the area is “one of the biggest conservation orientated projects Cowdray has done” (Ref Cowdray Estate website).</p> <p>For a number of years the SDNP has been promoting the Heathland Reunited, a project supported by 11 organisations to expand and connect the heathland in the national park. The total project value is £2.47 million part of which will be used to create wildlife corridors. The Severals has been an important part of the project. It seems counter productive that there tearing up these areas for a sand quarry is now being considered after the cost and effort put into this project and the obvious importance the SDNP gives this given the publicity. This project even receives a full page in the SDNP monthly newsletter for February 2019.</p> <p>The idea that the site could be restored to anything even remotely recognisable as “natural” with “interspersed ponds” as suggested in the assessment is really quite risible. Particularly given what all local residents have seen of the existing sand extraction site at Minsted. A broad leaved woodland with interspersed ponds is not a natural heathland environment as is currently found across the area and existing conservation efforts have been focused on re-establishing. The purpose of the SDNP should be to maintain and protect the existing environment not manufacture an environment to meet industrial needs.</p> <p>There is already public access linked with Midhurst Common and the Serpent Trail which crosses both Severals East and West so this is not a “restoration” option – it already exists.</p> <p>Very small scale historical quarrying was undertaken on Midhurst Common. Those sites demonstrate what happens when the soil is removed. The ponds and surrounding area are</p>

Site specific information		
Planning history		
Extension to existing	One of two new sites coming forward, lies	
Planning policy	Within Chichester District Rural Policy Area where development is restricted. Note: The	
Planning history	Site was not allocated in the Minerals Local Plan (2003) or the JMLP (2018). Site	

	Key Criteria	RAG Score	Comments/Additional Information
Landscape and visual designations	Within South Downs National Park	AMBER The site falls within the boundary of the SDNP and has a Medium-High	RED given recent conservation efforts and potential for restoration to natural environment. Since the Landscape Study in 2011, a great deal of money and effort have gone into restoration of the heathland area of Severals East and

	Key Criteria	RAG Score	Comments/Additional Information
	<p>Landscape Study (LUC, 2011):</p> <p>Whilst the woodland and forest limit intervisibility with the surrounding area to an extent, the site forms a link between Midhurst Common, to the east, and Stedham Common to the west, traversed by dense network of paths and bridleways, including The Serpent Trail. The site therefore contributes significantly to the recreational value of the wider area. The potential effects of the development on the areas of ancient woodland, the tranquility and sense of remoteness of the area and the recreational value of the area increase the sensitivity of the site. Although predominantly comprising plantation forest, restricting views into the area and enabling the visual containment of extraction activities within existing tree cover, areas of broadleaf trees reduce the overall capacity of the landscape. The southern part of the site narrows considerably, reducing scope to locate extraction away from sensitive landscape features in adjacent areas of woodland and</p>	<p>sensitivity to extraction. The site falls within an area of medium tranquility.</p> <p>Some potential for landscape enhancement at the restoration phase.</p>	<p>West. Several East has had work carried out in partnership with the Friends of Midhurst Common and the SDNP to restore the heathland with a Wildlife Improvement Grant from Chichester District Council.</p> <p>In consultation with the SDNP, the woodland has been cut back on both sides of the Severals Road to establish a wildlife corridor to link Midhurst Common with Stedham and Iping Common which will be disrupted by the proposed activities.</p> <p>In addition, The Cowdray Estate has received grants of up to £4,000 per hectare from the Forestry Commission to clear rhododendron from the area as part of the Cowdray Estates “ongoing commitment to preserving and enhancing the local area”. A commitment that does not seem in keeping with a sand quarry on the site. The clearing of rhododendron was stated to have a significant impact on The Severals enabling native flora and fauna to re-establish and provide habitats for animals and bird species to include Nightjar and Dartford Warbler. The Cowdray Estate were quoted as saying “Not only has our work enhanced the area, The Severals is now a much nicer place for the public to enjoy walking around.” See sign at end of document.</p> <p>Given the efforts to restore the natural environment over the Severals it seems that restoration of the area is already well underway, and progress is being made to return the area to a “natural” state. It would be to take a large step backwards to allow extraction regardless of the later restoration plans.</p>

	Key Criteria	RAG Score	Comments/Additional Information
	<p>heathland.</p> <p>The site is considered to have a Medium- High sensitivity and Low-Moderate capacity for mineral extraction.</p> <p>Supplement to WSCC Sensitivity Study 2011 (SDNPA, 2015): The site has a Medium-High sensitivity.</p> <p>Severals East and West both singularly and jointly, would be likely to have significant impacts on access and PROW. The existing use of the land for forestry plantation reduces its overall sensitivity on landscape grounds and to some extent how tranquillity is measured as the woodland is not perceived to be 'natural'. For this reason it has been considered that restoration proposals to heathland/woodland mosaic would be beneficial in the long term provided that sufficient areas of the sites can be restored to land rather than wet restoration with the associated water quality issues that</p>		<p>Any restoration would not improve the environment as the sand extraction would significantly alter the site, soils and landscape such that it would no longer be sustainable as heathland.</p> <p>The suggestion for landscape enhancement seems to be rather poorly thought through. The suggestion of broad-leaved woodland interspersed with ponds is not consistent the the existing or surrounding natural environment (or conservation efforts) and should not even be considered by the SDNP. How is that protecting the heathland environment? Has the assessment included a visit to the existing quarry at Minsted to identify how this conclusion is going to be applied to that site?</p> <p>We note that one of the other sites was discounted because it would be visible from a local high point. Severals East and West would be very visible from Bepton Down. The small cleared area on Midhurst Common adjacent to the site is easily identified from Bepton Down.</p> <p>More locally; the view from Sunset Hill looks immediately over the proposed area – particularly as the Cowdray Estate cleared their commercial forest growth to promote the view. Seemingly, more evidence that the landowner considered this a short time ago to be an enhancement to the community which is now invalid.</p>

	Key Criteria	RAG Score	Comments/Additional Information
	this involves.		
Nature conservation and geodiversity designations	<p>An SNCI lies to the west and east of the site. Adjacent to Midhurst Common SNCI (east). Stedham Common SNCI 0.7km west. River Rother SNCI 0.3km north. Iping Common SSSI and LNR is located 1km to the west of the site.</p> <p>Area of Ancient Woodland (replanted) partially located within the north of the site, buffer zone would protect from other land uses.</p> <p>Site contains priority habitat of lowland heath and ancient woodland, contains rare species inventory records and is within a Biodiversity Opportunity Area. Impact of changes to water table on heathland needs to be considered.</p> <p>This site lies approximately 6km from Singleton and Cocking Tunnel SAC. There is no scope for adverse impacts</p>	<p>RED/AMBER</p> <p>Site contains priority habitat of lowland heath and ancient woodland which would be majorly harmed by mineral extraction and as such high levels of mitigation would be required.</p>	<p>RED given interdependency of local sites and previous designation as a wildlife corridor.</p> <p>The assessment of protected sites is being undertaken on an individual site basis without consideration of the interdependency between and among sites. The Severals area has been identified as an important corridor (see comments above) linking many of these sites but in particular the SNCI's at Midhurst, Stedham and Iping.</p> <p>The Area of Ancient Woodland (replanted) is well within the existing area considered by the assessment so it is not clear how that can act as a buffer zone as it is being considered as part of the potential extraction area.</p> <p>See previous comments on mitigation and restoration.</p> <p>Severals East and West are identified as an SSSI Impact Risk Zone being just 300m from the Stedham Common SSSI. The Severals Bog is another important site with a unique fauna that will be destroyed by the quarry. The impact of the SSSI on the water table from quarrying is unknown and the impact on underground aquifers in free draining sand with the topography of these sights may change the existent fine balance of heathland ground water retention.</p>

	Key Criteria	RAG Score	Comments/Additional Information
	<p>on this European site.</p> <p>This site was 'screened in' for Appropriate Assessment as part of a previous Habitat Regulation Assessment carried out in 2011.</p> <p>The initial screening exercise identified that water quality was a pathway requiring consideration due to the potential impact of sediment within close proximity to European designated sites. Concluded that this site will not have any likely significant effects on the Arun Valley SPA/Ramsar through reduced water flows or quality.</p>		
Historic environment designations	<p>Heathbarn farmhouse (grade II listed) to the north east of the indicated site boundary. Grade II listed Toll House located 0.4km away to the north east.</p> <p>There are four Conservation Areas within 2km of the site, Midhurst, Iping, Stedham and Woolbeding.</p>	<p>GREEN/AMBER</p> <p>The site may cause minor harm to the setting of listed buildings, Conservation Areas and archaeological remains.</p> <p>Moderate mitigation measures should be adopted – including the undertaking of a Lidar survey.</p>	<p>AMBER Historical local significance</p> <p>There are a number of ancient sites in the area including the roman road across Stedham Common. Full archaeological studies should be carried out before any quarrying is permitted.</p> <p>The use of the area by the public has been well documented for over 150 years.</p> <p>In the 1868, G.D. Wolferston's <i>A Guide Book to Midhurst</i> describes the Severals as being '...laid out as a kind of pleasure ground, and</p>

	Key Criteria	RAG Score	Comments/Additional Information
	<p>Woolbeding Estate and Gardens north east of the site, managed by the National Trust.</p> <p>Early archaeological assessment strongly recommended - as a preliminary to any field evaluation a Lidar survey should be carried out (as this is a wooded site). Evaluation should be undertaken pre-determination and the results made available to consider at the application stage.</p>		<p><i>planted with every description of ornamental tree ... It is inexhaustible in walks'. In the early 1900's the local vicar and philanthropist, The Reverend Frank Tatchell, encouraged people to walk the commons and these woods. There is no better evidence for the allure of the Severals in those days than a 1913 Valentine Series postcard. This shows a well managed even aged stand of sunlit pines with a smooth needle strewn path wending its way into the distance. Centre stage and smiling, is a young family – a mother with her baby in its pram, three small daughters and a dog. The scene spells a perfect harmony between forestry and leisure.</i></p> <p>In a study of the social history of Midhurst Common, Jess Mariner of Heath Barn Farm remembered back to his boyhood in the 1930's. During fine weather people would be out on the rides in their Sunday best. They would like 'to be seen', walking, talking, meeting and amongst the tall trees – a kind of 'promenading in the forest'.</p>
Water environment (including flooding)	<p>Habitat Regulation Assessment 2010/11:</p> <p>Site screened in for Appropriate Assessment:</p> <p>The site lies approximately 6km from Singleton and Cocking Tunnel SAC. There is no scope for adverse impacts on this European site. However, the site does include a watercourse that drains to the river Rother and</p>	<p>AMBER</p> <p>Vulnerable water issues. EA to check.</p> <p>The risk and level of harm would be dependent on the depth of the proposed mineral working (above or below the water table) and the method of working.</p>	<p>RED until further studies of potential impact on Rother and Arun SPA and RAMSAR site completed.</p> <p>Part of the assessment in this section is directed at the identification of local SACs as opposed to the water environment.</p> <p>Potential impacts of the Rother should be a very high priority that does not seem to have been properly assessed at this stage. This is a more significant issue for Severals West than East.</p> <p>We would have thought that this should be a RED given the potential impact on an SPA Ramsar site with the potential to be AMBER</p>

	Key Criteria	RAG Score	Comments/Additional Information
	<p>ultimately into the Arun Valley SPA/Ramsar. There is therefore a potential pathway for sediment impacts so this site has been screened in for further consideration.</p> <p>Appropriate Assessment:</p> <p>There are adequate safeguards (dilution and planning conditions) in place to ensure that the site will not have an adverse effect on the Arun Valley SPA/Ramsar through reduced water flows or quality.</p> <ol style="list-style-type: none"> 1. Flood zone 1 2. Negligible risk to groundwater flooding 3. Low risk of surface water flooding 4. Depth of working and de-watering operations will need to be explored and assessed 5. No working below 	<p>A phase 1 hydrological and hydrogeological risk assessment should be undertaken before allocation.</p>	<p>following a hydrological and hydrogeological risk assessment.</p> <p>The whole of the area for both Severals East and Severals Wets is identified by DEFRA as a Drinking Water Safeguard Zone (Surface) Water. In addition, the northern part of Severals East is a Drinking Water Protected Area (Surface) Water.</p> <p>The impact of changes to the water table from quarrying has not been studied with potential major harm to the sensitive heathland environment, including the neighbouring SSSI and marsh area in the Quag. It is understood that the Minsted quarry affected the water table and monitoring wells were installed by the operator. The data from these wells has not been made available.</p>

	Key Criteria	RAG Score	Comments/Additional Information
	<p>groundwater table preferable</p> <p>6. Risk Assessment of the water environment (Qualitative Hydrological & Hydrogeological Risk Assessment) - recommend phase 1 prior to allocation</p> <p>7. Localised flooding experienced in 2013/14 at Woolbeding Estate and Gardens</p> <p>8. Possible Water Framework Directive impacts – drainage to watercourse which drains to Rother to Arun</p> <p>9. Any risk of sediment entering the watercourses which lead into the River Rother would need to be fully assessed and mitigated</p>		
Air quality	<p>Site not located within an Air Quality Management Area but off site traffic movements will need to be considered in the Transport Assessment.</p> <p>Traffic from this site may pass</p>	<p>AMBER</p> <p>HGVs may need to pass through a number of AQMAs in Chichester which would have a negative impact on air quality.</p>	<p>RED given potential traffic issues and the future AQMA in Midhurst.</p> <p>The transport assessment also needs to consider potential air quality issues on other routes long the A272 as not all traffic will travel to Chichester. There are potential issues to the west at Trotton, Rogate, Petersfield and the A3 corridor as well as towards Midhurst and Petworth to the east.</p>

	Key Criteria	RAG Score	Comments/Additional Information
	<p>through the AQMA's in Chichester (A27/A286 Stockbridge roundabout, A286- Orchard St and A285- St Pancras).</p> <p>If traffic would have a negative impact on an Air Quality Management Area, then an Air Quality Assessment would also be required</p>		<p>The key area is probably Midhurst as air quality in the Rumbold's Hill area is currently not meeting relevant air quality standards. Monitoring is in progress and the expectation is that this will be identified as an AQMA in the very near future.</p>
Soil quality	<p>Grade 4 no loss of BMV agricultural land.</p>	<p>GREEN</p> <p>The site contains no BMV agricultural land.</p>	<p>RED sand removal would result in complete destruction of the heathland habitat.</p> <p>This appears to be a rather simplistic conclusion. Soil is not only of agricultural value. The sandy soil of the heathland is what makes the area unique and defines the heathland habitat and has been a key criteria for inclusion of the heathland within the national park. To assess the soil in terms of its agricultural quality alone misses the whole point of the park designation. Removing the sand also has a significant impact on biodiversity as can be seen from historical quarries in the area which, after decades, have not recovered.</p>
Public rights of way	<p>Public Footpaths 3617 and 3618 run through the northern section of the site. Footpath 921 follows the eastern boundary of the site. Both footpaths 3617 and 921 form part of the Serpent Trail.</p> <p>All existing PROW are to be</p>	<p>AMBER</p> <p>The site would pose a potential hazard for users of PROW. Planning obligations and mitigation measures may make the site acceptable in terms of</p>	<p>AMBER</p> <p>The area is well established as an important amenity area. As well as the Public footpaths there are a number of footpaths identified as areas with agreed public access across the site. As the site boundary takes up the entire Severals woods this would severely restrict access to quite a large area with few alternatives.</p>

	Key Criteria	RAG Score	Comments/Additional Information
	<p>accommodated on their legal line and not to be disturbed, obstructed or public access deterred until and unless legal diversion or extinguishment (a public path order – PPO) is proposed and legally confirmed.</p> <p>Opportunities to enhance future public access will be pursued by the PROW Teams through any future planning application.</p>	PRoW.	<p>In addition, the noise from extraction activities would result in a significant impact on the amenity value of the area.</p> <p>Opportunities to improve access would appear to be very limited as currently there is access across the whole site.</p> <p>The Serpent Trail is strongly promoted by the SDNPA as “a 64-mile path which winds its way through the rare heathlands of the South Downs National Park.” The enjoyment of this stretch will be significantly harmed.</p>
Transport and access	<p>Possible access from Severals Road/A272. Suitability of access road needs to be assessed. The impact of additional HGV traffic on Midhurst and the villages to the west of the site should be suitably considered.</p> <p>High level transport assessment (2011) concluded:</p> <p>Access is possible directly onto the A272. It is recommended that the sites (Severals West and Severals East) are sequentially developed.</p>	<p>AMBER</p> <p>The site poses a moderate risk of causing harm – especially if HGV traffic passes through villages.</p> <p>Risks associated with transport/access may be reduced if Severals West and East are developed sequentially.</p>	<p>RED as safe access to the site for that number of vehicles is not feasible.</p> <p>Access to the Severals Rd is not credible. The Severals Rd is a small single track village lane with restricted access through a sunken lane to the A272.</p> <p>Any access to the A272 will be extremely dangerous given the speed and volume of traffic. It is already heavily used by aggregate lorries. On one day recently we came across 6 aggregate lorries between the Severals and Trotton Bridge in the space of less than 10 mins. We suggest you speak with the local farmer at Woolmer Bridge who has difficulty accessing the A272.</p> <p>The transport assessment also needs to consider issues on other routes long the A272 as not all traffic will travel to Chichester. There</p>

	Key Criteria	RAG Score	Comments/Additional Information
			<p>are potential issues to the west at Trotton, with the Grade 1 listed single track bridge, and Rogate where there is restricted space and similarly through Midhurst and Petworth to the east. Local residents already have fears arising from existing aggregate lorries operated by Inert and Dudman which travel at some speed through the area.</p> <p>Recent air quality monitoring has found that the centre of Midhurst is one of the three worst areas for air quality in West Sussex. Further monitoring is almost complete but it is expected that some areas will be identified as an AQMA.</p> <p>The assessment suggests a sequential development. No estimate has been made for how long it will take to work each site but if we look at 4 million tonnes for the two sites and assume 20 tonnes per lorry that equates to 200,000 lorry loads. Sand when wet weighs 20-30% more that equates to an extra 40,000 lorries. Over a 10 year period and assuming 261 working days a year that would be between 75 and 92 per day – double that over a 5 year period. That would be up to 370 lorry movements per day. That is not even remotely feasible for both traffic impact and local air quality.</p>
Services and utilities	To be identified using evidence provided by utility/service providers.	<p>GREEN</p> <p>There are no services or utilities near to, or within the site.</p>	Amber – Severals East is traversed by HT lines overhead which would need to be rerouted causing significant incidental works and disruption. The A272 has main gas transfer pipeline running adjacent to the sites and this may need significant protection from any works access point.
Amenity	Severals House and residential properties to the south of the site. Heathbarn Farm and 1 and 2 Severals Cottages lie	<p>RED/AMBER</p> <p>There are a number of</p>	<p>RED</p> <p>Agree that there are a number of sensitive receptors very close to the</p>

	Key Criteria	RAG Score	Comments/Additional Information
	<p>immediately to the east of the site.</p>	<p>sensitive receptors close to the site who would be subject to high levels of harm.</p> <p>Mitigation measures may enable the site to be workable.</p>	<p>site and the area is of high importance for amenity use.</p> <p>Heathbarn Farm doesn't lie "immediately" to the east. It is right up against the boundary. Similarly the report omits 'The Cottage at the Severals' which abuts the proposed site.</p> <p>Furthermore; amenity value of the site(s) is not limited to those properties immediately adjoining the proposals. The area is valued for its beauty, scenery and tranquillity as illustrated with the formation of Friends of Midhurst Common (FOMC) being formed to protect this. This group and the work they have done (with the consent and help of the Cowdray Estate and SDNPA) represents the values of a much wider community in the town.</p>
Cumulative impact	<p>There is a history of mineral working in close proximity to the site.</p> <p>Landscape Study (LUC, 2011):</p> <p>With the proximity of the existing extraction site to the northwest, there is potential for cumulative effects on the special qualities of the wider Wealden Farmland and Heathland Mosaic character area, with the SDNP.</p>	<p>RED/AMBER</p> <p>The site may cause considerable harm due to the site's proximity to other mineral sites.</p>	<p>RED given existing activity in the area and potential for development of multiple sites.</p> <p>Cumulative impact with the proposed joint development with Severals West would be very high if sites were developed simultaneously or separately. In addition, the site at Minsted currently has consent to extract sand until 2041 and although it is currently suspended there is the intention for extraction to start again. If active at that same time as either of the Severals sites or the Minsted extension that is also under consideration in this process then the traffic implications alone would be significant. Lorry traffic from the Minsted site is very noticeable when it is active.</p> <p>Similarly, when active, noise from the Minsted site is a real problem and we have issued complaints in the past. Multiple sites would exacerbate the problem in an area where there is very little baseline noise. Minsted quarry is in default of its plans to restore the site and efforts by the SDNPA to make this happen have been weak. There is</p>

	Key Criteria	RAG Score	Comments/Additional Information
			<p>little trust in the community that promises will be met by other operators.</p> <p>Cumulative impacts would also result from many of the other issues raised above such as:</p> <ol style="list-style-type: none"> 1. Air Quality 2. Traffic 3. Wildlife 4. Access 5. Protected heathland
Airport safeguarding	Not applicable	<p>GREEN</p> <p>The site does not fall within an airfield safeguarding zone.</p>	No comment

Key issues/constraints	Additional Comments
The site is located within the SDNP. The site is considered to have a medium to high landscape character sensitivity to extraction, with the areas of ancient woodland and the water course to the west of the site of higher sensitivity. The site has moderate to low landscape	Landscape – there have been significant efforts recently to return the Severals to its natural heathland environment. This has taken considerable cost and effort and it would be short sighted to then undo all of the successful efforts of the past few years

<p>capacity overall for accommodating mineral extraction.</p> <p>Site contains priority habitat of lowland heath and a small area of ancient woodland. This site was 'screened in' for Appropriate Assessment as part of a previous Habitat Regulation Assessment carried out in 2011. It was concluded that this site will not have any likely significant effects on the Arun Valley SPA/Ramsar through reduced water flows or quality. Further assessment of groundwater issues is required.</p> <p>The site could have a negative impact on a small number of adjacent residential properties. Public Footpaths 3617 and 3618 run through the northern section of the site and would require diversion.</p>	<p>Noise potential noise disruption has not been considered. Particularly if multiple sites are operational.</p> <p>Access/Amenity – it is a significant area for amenity use not limited to the formal Public Rights of Way. The way this assessment is worded, it seems that diversion of footpaths seems to be just assumed as a given.</p>
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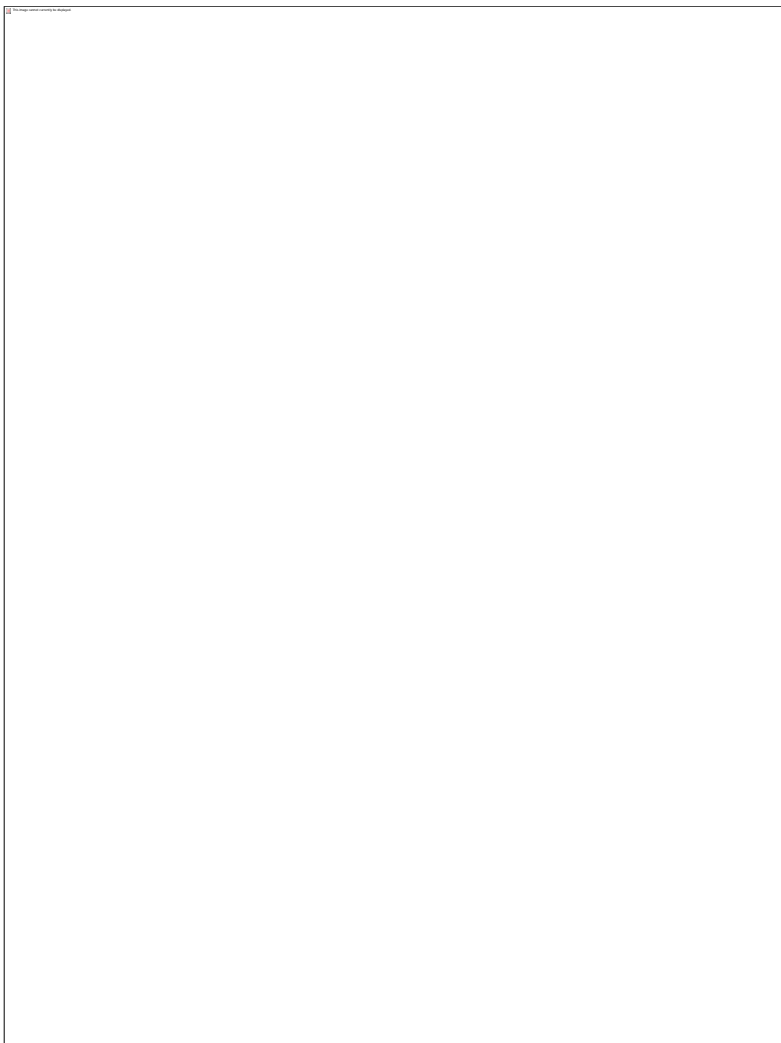
Noise

No consideration has been given to noise issues associated with sand extraction. As residents of the area know, existing sand extraction at the Minsted site can be heard well over a mile away. The proximity of the proposed site to housing and amenity areas will result in significant noise impacts over a large area, particularly if multiple sites are given consent. The existing site at Minsted has consent until 2041 although operations are currently suspended due to not meeting some consent conditions.

Wildlife/Plants

The assessment does not appear to address specific wildlife concerns. The South Downs is home to the only heath in the country where you can find all twelve of our native reptiles and amphibians. Including the **Natterjack Toad, Sand Lizard and Adder** (SDNP Website). Other sensitive species present in the SDNP heathland include:

6. **Silver studded blue butterfly** which has “undergone a major decline in numbers during recent years, mainly due to heathland habitat restrictions. It can be found in good numbers on sites across the project area. However this butterfly rarely flies any distance, sometimes moving less than 20m in its lifetime” (SDNP website).
7. **Nightjars** have also declined in numbers since the 1980’s and as noted above, part of the restoration of the heathland already undertaken at the Severals was to encourage nightjar to the area. Anecdotal evidence from locals suggests that this is starting to prove to be successful.
8. **Woodlark** also nest in low and open heathland vegetation.
9. **Badger** setts (Protected in the UK under the Protection of Badgers Act, 1992, and the Wildlife and Countryside Act, 1981) are found throughout the Severals and are followed by some of the local conservation groups. We understand from local badger protection groups that workers on the Severals destroyed a badger sett despite being warned on numerous occasions that it was present and after agreeing not to work in the area. Unfortunately the police investigated but did not prosecute. So we do not hold out much hope of any further measures to protect badgers in the area.
10. **Raven** have been breeding in the Severals and they were extinct in Sussex for over a century
11. Scarce bog plants - Marsh Valerian, Marsh Violet, Round leaved Water Crowfoot, Bog Pondweed, White Sedge and the fungus Bog Beacon





WEST SUSSEX SOFT SAND REVIEW: ISSUES AND OPTIONS

Please complete and return this form to Planning Services, West Sussex County Council, County Hall, Chichester, PO19 1RH by **18 March 2019**. Visit our website for further information: www.westsussex.gov.uk/mwdf.

Data Protection/Privacy: West Sussex County Council is registered as Data Controller(Reg. No. Z6413427). For further details and information about our Data Controller, please see www.westsussex.gov.uk/privacy-policy.

PART A: PERSONAL INFORMATION

A1. Personal Details

Name

Job Title (where relevant)

Organisation or affiliation (where relevant)

A2. Client Details (if applicable)

If you are completing this form on behalf of someone else then please provide details of the person(s) or organisation you represent.

Name

Job Title (where relevant)

Organisation or affiliation (where relevant)

A3. Contact Address Details

Please provide details of the person who should be contacted regarding this response

Address

Telephone

Email

Preferred Method of Contact Post Email

Please tick all categories below that most adequately describe you.

- Resident
- Parish/Town Council
- SDNPA Member
- Local Business
- District/Borough Councillor
- Government Organisation
- Minerals or Waste Industry
- County Councillor
- Non-Government Organisation
- Landowner
- Local Authority
- Other (please specify)

If you submit a consultation response, your contact details will be used to automatically notify you of updates with regards to the soft sand review and minerals and waste planning policy. Please tick the appropriate box if you **DO NOT** wish to be notified of the following.

- Progress and consultation on the Soft Sand Review
- Any further updates about Strategic Waste or Minerals Planning in West Sussex

Question 5: Do you have any comments on the nine shortlisted sites identified in the Issues and Options Consultation Document?

Please tick all that apply and provide comments below.

- | | | | |
|--|--|---------------------------------------|---|
| <input type="checkbox"/> Buncton Manor Farm | <input type="checkbox"/> Chantry Lane | <input type="checkbox"/> Coopers Moor | <input type="checkbox"/> Duncton Common |
| <input type="checkbox"/> East of West Heath Common | <input checked="" type="checkbox"/> Ham Farm | <input type="checkbox"/> Minsted West | <input type="checkbox"/> Severals East |
| <input type="checkbox"/> Severals West | | | |

* PLEASE SEE ATTACHED DOCUMENT

STEYNING PARISH COUNCIL RESPONSE TO THE MARCH 2019 CONSULTATION

WEST SUSSEX COUNTY COUNCIL JOINT MINERAL PLAN

CONTENTS :

- 1. Covering letter from the Steyning Parish Council in response to the call for comments regarding Soft Sands review consultation dated 15th March 2019.**
- 2. 2016 Steyning Parish Council Response Report to the previous Consultation regarding the Joint Minerals Plan**
 - i, Failure by WSCC to uncover an existing restrictive covenant, which is enforceable by an adjoining owner**
 - ii, Failure by WSCC in their statutory duty with regard to the National Planning Policy Framework (NPPF) and the Horsham District Planning Policy Framework**
 - iii, Unacceptable impact on the Landscape**
 - iv, Water and Flooding**
 - v, Deliverability**
 - vi, Highways and Traffic**
 - vii, Health, well-being and loss of amenity:**
 - viii, Local economy**
 - ix, Bio Diversity**
 - x, Historic environment Listed buildings**
 - xi, Conclusion**
 - xii, Appendices**

Steypning Parish Council



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West Sussex, BN44 3XZ
For Sat. Nav. Use BN44 3YL

Planning Department
West Sussex County Council
County Hall
west Street
Chichester
West Sussex PO19 1RG

Date 15th March 2019

Dear Sirs

re. WEST SUSSEX JOINT MINERALS LOCAL PLAN - SOFT SAND REVIEW

I write on behalf of the Steypning Parish Council and in response to the call for comments regarding the current Soft sands review consultation.

We have very strong objections to your inclusion of Ham Farm within this allocation. The accompanying report published in 2016 is a comprehensive assessment of why we believed the process which was including the site known as 'Ham Farm' was fundamentally flawed, and the contents of this report remain very relevant to our current position.

We have reviewed the Soft Sands sites selection report 2019 and other relevant documents most carefully and would like to add these further comments in relation to our opposition to the case for the 'Ham Farm' allocation.

N.B. Single Issue Soft Sand Review – Issues & Options Consultation (Reg.18), January 2019 – referred to hereafter as SISSR

Soft Sand Sites Selection Report, January 2019 – referred to hereafter as 4SR

Guiding Principles

SISSR, page 4 says:

“The Authorities have identified five guiding principles that, if required, will be used to select sites to meet the identified shortfall.”

SISSR, page 18, paragraph 4.9 says:

“Although sites within the shortlist may be judged to be ‘acceptable in principle’ for site allocation, there is a need to identify how they should be selected, if required, in accordance with the preferred strategy. The JMLP contains guiding principles (see

paragraph 7.1.6) that have been used to shape the following principles for the selection of soft sand sites:

- *First Principle: Places where there are opportunities to restore land beneficially.*
- *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: Sites that have good access to the Lorry Route Network (LRN).*
- *Fourth Principle: The need to conserve and, where possible, enhance protected landscapes in the plan area.*
- *Fifth Principle: A preference for extensions to existing sites rather than new sites, subject to cumulative impact assessments.”*

It is clear that these guiding principles should be taken into account in the selection of the sites to be allocated in the Plan. **Based upon this guidance the Fifth principle should be applied, and the Second Principle seems to have been contravened in the case of the residences near to the Ham Farm site.**

National Planning Practice Guidance

4SR, page 4, paragraph 2.4 says:

“In terms of identifying minerals sites, government guidance set out within the national Planning Practice Guidance advises that this should consider the following:

- *The presence of viable resources*
- *Support from landowners for minerals development*
- *Acceptability, in planning terms.”*

In the past, WSCC have argued that operator interest is an indicator of viability of extraction. On page 84 of the 4SR, they state that the deposit has been tested and the operator is interested in delivering the site. **However, no independent direct proof of the viability of the Ham Farm site is given in the 4SR.**

Vision

4SR, page 5, paragraph 2.8 says:

“It is also important that the chosen sites are consistent with the JMLPs Vision and Strategic Objectives.”

There is no further mention of these tests in the 4SR.

The Vision is set on page 14 of the Adopted Plan. The following statements are relevant here.

“West Sussex:

Will be a place where minerals are produced in ways which conserve and enhance the beautiful outdoors of West Sussex, including the special qualities of the South Downs National Park and Areas of Outstanding Natural Beauty, for the benefit of current and future generations.

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 exploitation of the Ham Farm site does not seem consistent with these elements of the Vision.

Strategic Objectives

The Strategic Objectives are set out in Section 2.3 of the Adopted Plan. The following are relevant here.

“Strategic Objective 6: To protect, and where possible enhance, the health and amenity of residents, businesses and visitors.

Strategic Objective 7: To conserve and enhance the landscape and townscape character of West Sussex and the special qualities of the South Downs National Park and the local distinctiveness and character of the High Weald AONB and Chichester Harbour AONB and the settings of all protected landscapes.”

The Ham Farm site would have adverse impacts on the amenity of nearby residents and so contravene Strategic Objective 6. The site would also not comply with Strategic Objective 7 (which is the same as the statement above from the Vision).

Assessment of HAM Farm Site

The assessment of the Ham Farm site is given on pages 82 to 91 of the 4SR. In principle, a red score would rule out a site from further consideration, although three of the shortlisted sites have a red score. The Ham Farm site has no red scores but three red/amber scores. **The red/amber score given to amenity seems an understatement in relation to the impacts on the properties adjacent and near to the site.**

Mitigation

Paragraph 22, page 14, in the National Planning Policy Framework Technical Guidance (March 2012) says:

“In some circumstances, new or extended permissions for minerals extraction close to residential property may not provide adequate protection. In such cases, it may be justified to consider adequate separation distances. Any such distance should be effective but reasonable, taking into account:

- *the nature of the mineral extraction activity (including its duration);*
- *the need to avoid undue sterilisation of mineral resources, location and topography;*
- *the characteristics of the various environmental effects likely to arise; and*
- *the various amelioration measures that can be applied.”*

In order to mitigate the adverse impacts on the adjacent and near-by properties, some parts of the site between the residences and the workings would need to remain undeveloped preferably to a distance of at least 100 meters. This would again reduce the viability of the site, and especially as some of these properties have Grade II listed status.

In conclusion therefore the Parish Council continues to seek the removal of the Ham Farm site from the next version of the draft mineral plan

Yours Sincerely

John Fullbrook

Steyning Parish Council Clerk

STEYNING PARISH COUNCIL RESPONSE
WEST SUSSEX COUNTY COUNCIL JOINT MINERAL LOCAL
PLAN - 2016

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)

Steyping 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.”

Steyping 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”*

Steyping 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.

4: 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).

5: 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."

6: 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.

7: 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.

8: 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.**

9: 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.**

10: 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:

Steyping 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.

Steyping Parish Council
June 2016

Appendices:

Appendix 1

Photographic evidence of view from Chanctonbury Hill and other view points from the South Downs.



Rock QUARRY. (A) FROM CHANTON BURY RING



from connecting path from south downs way to HIGH HORSE STAGE. (B)



FROM HIGH HORSE SHOES NEAR BENCH. (C)



FROM PERMISSIVE FOOTPATH ABOVE TENNIS COURTS ON HIGH HORSE SHOES (D)





Appendix 2:

Existing quarries at Washington and Storrington demonstrating potential for cumulative visual impact if Ham Farm is excavated.



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 Dunstons 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 Wappingthorn Farm and land and on additional land farmed by F.de Boer & Partners .

1.11 The digestate leftover 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 Wappingthorn 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.

101 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.

102 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.

103 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.

104 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 Wappingthorn 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.

105 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 Wappingthorn 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 Wappingthorn Farm itself. The remaining 77% is spread on the additional arable land farmed by the company.

106 This proposal sees a move away from the production of animal feeds at Wappingthorn Farm and the wider land farmed by F. de Boer & Partners.

107 The plant will be fed by 8740 tonnes per annum of maize silage.

108 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.

109 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 Wappingthorn 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:

7th November 2013

The move to a business model focused around Anaerobic ^{pc 11/3/1958} 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.

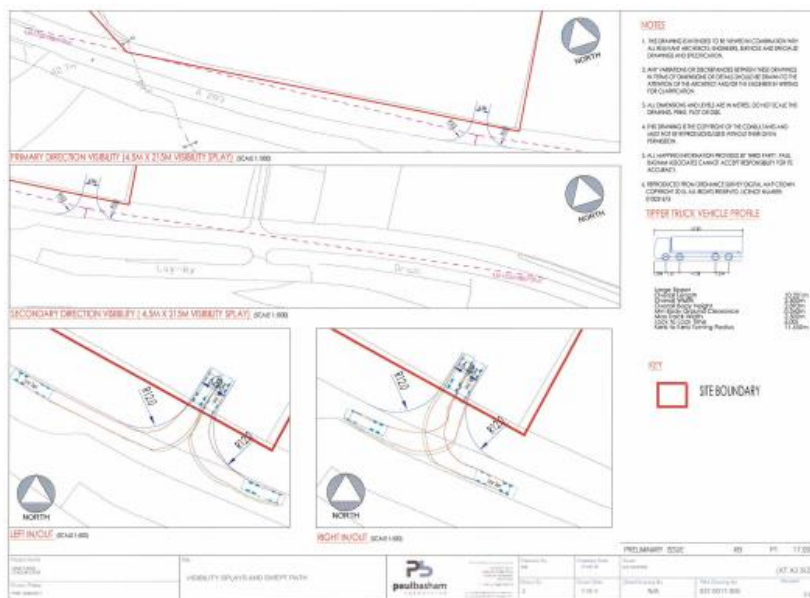
The applicant has submitted a traffic report that considers the existing farm activities against the proposed farm activities associated with the running of this plant.

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:



Appendix 6:

Duke and Ockenden Bore

Bore Hole Test March 1948

6/10/2016 Page 2 | Borehole TQ11SE66 | Borehole Logs

1963 WL 22438/0364 10w 7/45 (51) F.R.S.

RECORD OF WELL (SHAFT OR BORE)

(For Survey use only) **N. 1678**
1-inch Map Registered No. **318 TQ 11/46**
227

At **HOM FARM**
Town or Village **STEYNING**
County **SUSSEX** Six-inch quarter sheet **L1. NE/W**
For Mr. **WYSTON ESTATE**
Exact site of well **7/8 mile NE of Wynton House**
200 ft S of Farm Buildings see sketch Attach a tracing from a map, or a sketch-map, if possible.

Level of ground surface **+116** If well-top is not at ground level, state how far ... (above; below; ft.)
above sea level (O.D.) **120 approx ft.**

SHAFT **ft.**; diameter **ft.** Details of headings

BORE **125** ft.; diameter of bore: at top **6** ins.; at bottom **4** ins. Lengths, diameters, perforations, etc., of lining tubes **6" I.D. surface to 108'**
4" perforated a gauge covered from 105' to 125'

Water struck at depths, below well top, of (feet) **about 108'**

Rest-level of water **20** ft. ^{above} well-top. Suction at **72** ft. Yield on **8** hours' pumping, **360** gal. per **hour** with depression to **72** ft. below well-top. Capacity of pump **400** g.p.h. Recovery to rest level in **mins.** Date of measurements **March 1948** Date of well **March 1948.**

Quality of water (attach copy of analysis if available)

Well made by **Duke & Ockenden Ltd**
Information from **DUKE & OCKENDEN, LTD** LONDON AND LITTLEHAMPTON

Additional notes in space overleaf.

GEOLOGICAL CLASSIFICATION	NATURE OF STRATA	THICKNESS		DEPTH	
		Feet	Ins.	Feet	Ins.
	If measurements start below ground surface, e.g., from bottom of an existing shaft, state how far				
<i>Drift</i>	Soil	1	6	1	6
	Brown clay & Gravel	6	6	8	0
<i>G</i>	Clay (chocolate colour)	2	0	10	0
	Blue clay	50	0	60	0
	Grey sandy clay	30	0	90	0
	Dark Brown sandstone	5	0	95	0
	Light Brown sandstone	2	0	97	0
<i>FB</i>	Sandy clay	4	0	101	0
	Dark Brown sand	4	0	105	0
	Grey sand	20	0	125	0
	Analysis <i>in pu gall</i>				
	Total Solids	14.0			
	Chlorine	1.6			
	Ammonia	0.0019			
	Aluminium Ammonia	0.0006			
	Si. as Silicic acid	Absent			
	Iron	present in quantity			
	Total hardness (Clark scale)	9.6			
	Continued over leaf				

Continued over leaf **P.T.O.**

GEOLOGICAL SURVEY AND MUSEUM, SOUTH KENSINGTON, LONDON, S.W.7.	Date received 26.5.48	Correspondence File No.	1" N.S. Map No. 318	1" O.S. Map No.	Site marked (use symbol on 1" Map on 4" Map) 0 0
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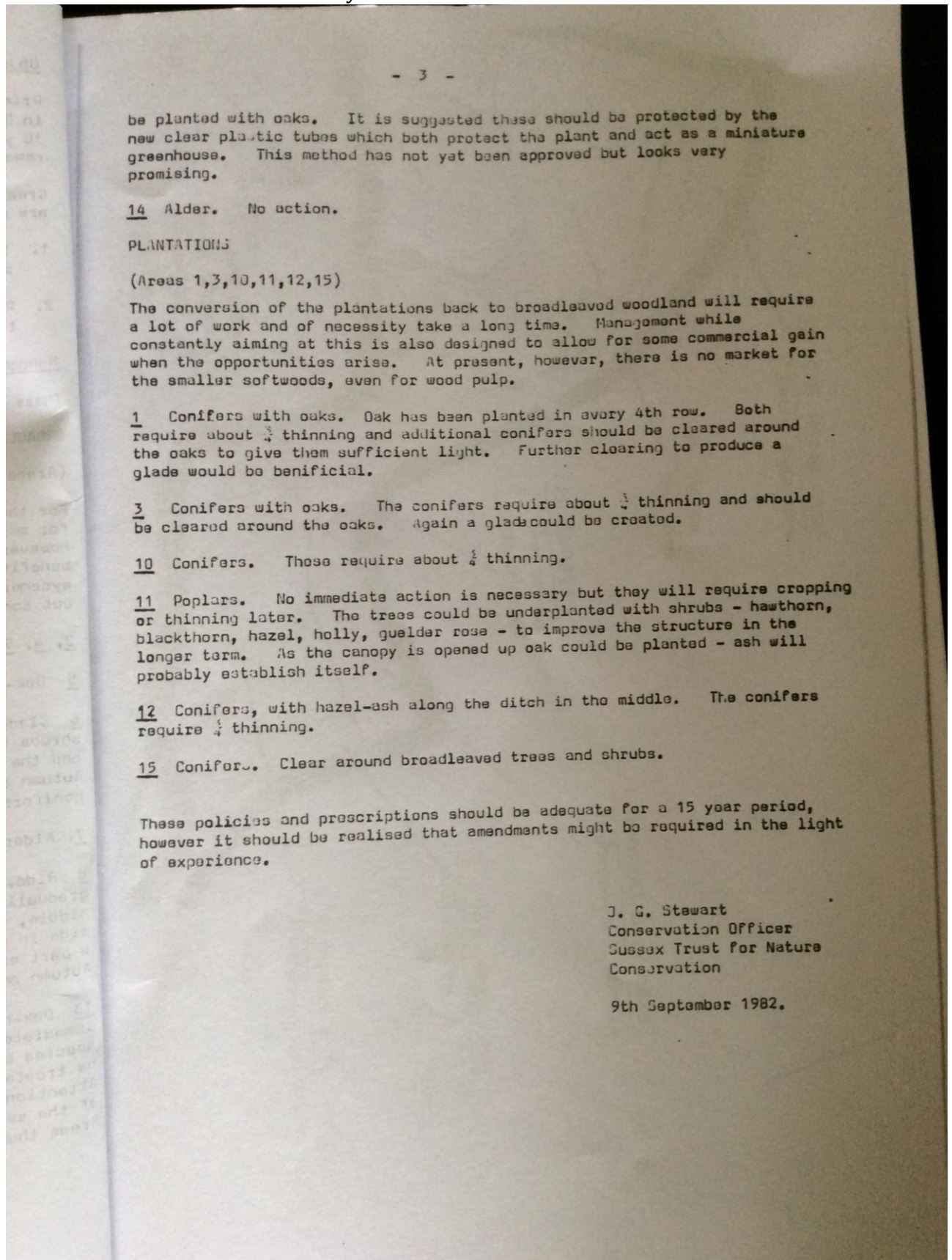
Appendix 7:

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:



Objects of Management

Primary broadleaved woodland is the richest type of habitat to be found in Britain. Unfortunately much has been lost (nearly 50% in the last 30 years in the country as a whole), therefore the conservation of the remaining examples is of the greatest importance.

Great Alder Wood is probably an 'ancient' wood and the broadleaved parts are suitably varied in species. Objects of management, therefore, are:-

1. To maintain and enhance the existing areas of native broadleaved woodland and associated features such as rides and glades.
2. Progressively to return the areas of coniferous plantations back to broadleaved woodland.

Management Prescriptions

These can be divided into two main parts:-

BROADLEAVED WOODLAND

(Areas 2,4,5,6,7,8,9,13,14, on map)

For the most part the policy should be one of no action at the moment for most of these areas can continue without any interference. Some work, however, is required to maintain glades and the ride (of great benefit to insects, particularly butterflies and birds), to control sycamore which is not a native species and is very invasive, and to take out some conifers.

2, 4, 9, Oak-hazel-ash. No action.

5 Oak-hazel-ash. Remove conifers.

6 Glade. This should be maintained by occasional coppicing of the shrubs (a little each year so that it is all covered about every 5 years) and the clearance of bramble and tall herbs. This should be done in Autumn and Winter; cut material is probably best burnt. Remove surrounding conifers.

7. Alder. Remove adjacent conifers.

8 Ride. This should have structured sides - low herbs in the middle, gradually stepping up through tall herbs and scrub to each side. The middle, therefore, should be cleared regularly, the tall herbs on each side in alternate years, and the shrubs coppiced about every seven years, part each year on a rotational basis. This work should be done in Autumn and Winter.

9 Oak-hazel-ash. This area also contains a lot of sycamore. The immediate aim should be to prevent the further establishment of this species by uprooting seedlings and cutting saplings. Cut stumps should be treated with either Brushwoodkiller or Amcide diluted in paraffin. Attention should then be turned to the large specimens (the source of much the seed) which should be felled. Cut stumps should be treated. Areas thus cleared could

be planted with oaks. It is suggested these should be protected by the new clear plastic tubes which both protect the plant and act as a miniature greenhouse. This method has not yet been approved but looks very promising.

14 Alder. No action.

PLANTATIONS

(Areas 1,3,10,11,12,15)

The conversion of the plantations back to broadleaved woodland will require a lot of work and of necessity take a long time. Management while constantly aiming at this is also designed to allow for some commercial gain when the opportunities arise. At present, however, there is no market for the smaller softwoods, even for wood pulp.

1 Conifers with oaks. Oak has been planted in every 4th row. Both require about $\frac{1}{4}$ thinning and additional conifers should be cleared around the oaks to give them sufficient light. Further clearing to produce a glade would be beneficial.

3 Conifers with oaks. The conifers require about $\frac{1}{4}$ thinning and should be cleared around the oaks. Again a glade could be created.

10 Conifers. These require about $\frac{1}{4}$ thinning.

11 Poplars. No immediate action is necessary but they will require cropping or thinning later. The trees could be underplanted with shrubs - hawthorn, blackthorn, hazel, holly, guelder rose - to improve the structure in the longer term. As the canopy is opened up oak could be planted - ash will probably establish itself.

12 Conifers, with hazel-ash along the ditch in the middle. The conifers require $\frac{1}{4}$ thinning.

15 Conifer.. Clear around broadleaved trees and shrubs.

These policies and prescriptions should be adequate for a 15 year period, however it should be realised that amendments might be required in the light of experience.

J. G. Stewart
Conservation Officer
Sussex Trust for Nature
Conservation

9th September 1982.

BIRD COUNT 1978/84.

BIRDS NESTING.

KESTREL.
RED-LEGGED PARTRIDGE.
MALLARD.
SPARROWHAWK.
PHEASANT.
MOORHEN.
LAPWING.
WOODCOCK.
WOOD PIGEON.
COLLARED DOVE.
CUCKOO.
TAWNY OWL.
GREEN WOODPECKER.
GREAT SPOTTED WOODPECKER.
SKYLARK.
SWALLOW.
CARRION CROW.
JACKDAW.
MAGPIE.
JAY.
GREAT TIT.
BLUE TIT.
COAL TIT.
WILLOW TIT.
LONG-TAILED TIT.
NUTHATCH.
TREECREEPER.
WREN.
MISTLE THRUSH.
SONG THRUSH.
BLACKBIRD.
ROBIN.
BLACKCAP.
CHIFFCHAFF.
GOLDCREST.

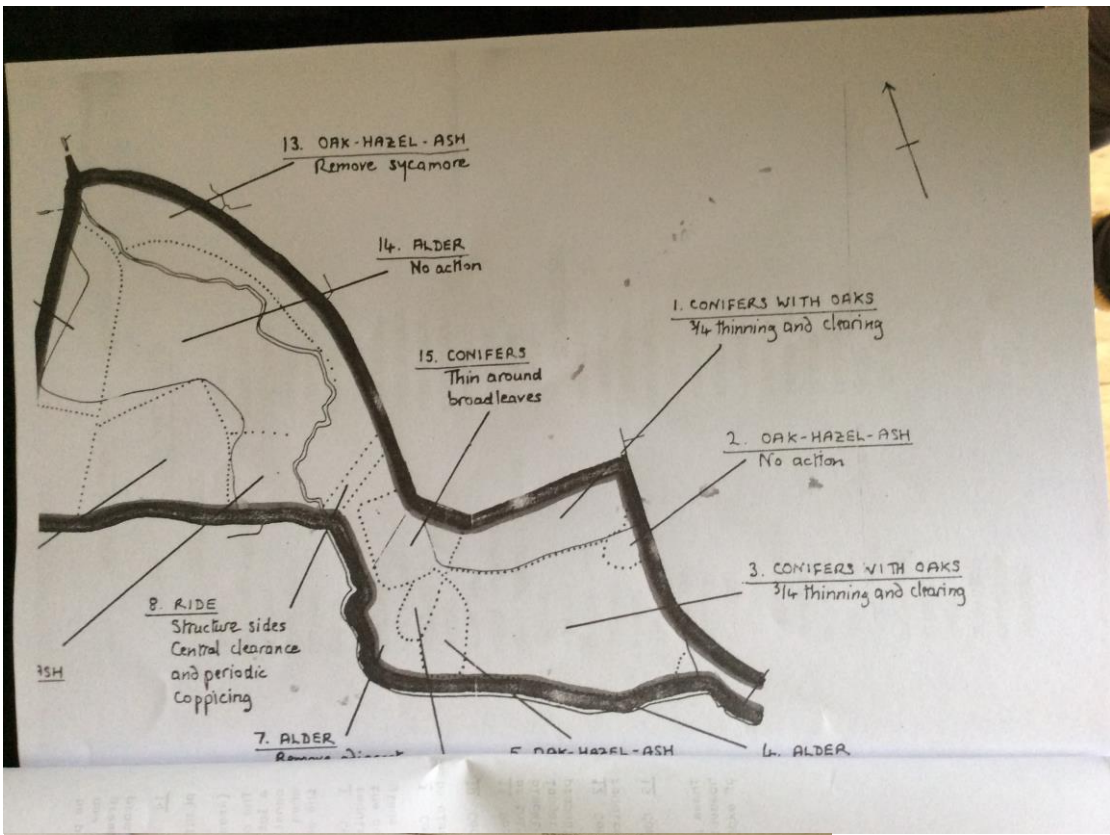
DUNNOCK.
MEADOW PIPIT.
PIED WIGTAIL.
STARLING.
GREENFINCH.
BULLFINCH.
CHAFFINCH.
REED BUNTING.
HOUSE SPARROW.
TREE SPARROW.
NIGHTINGALE.
NIGHTJAR.
STOCK DOVE.
LITTLE OWL.

VISITING BIRDS.

GREY HERON.
HERRING GULL.
KINGFISHER.
SAND MARTIN.
ROOK.
FIELDFARE.
REDWING.
HAWFINCH.
GOLDFINCH.
TUFTED DUCK.
POCHARD.
PARTRIDGE.
SNIPE.
BARN OWL.

WILD LIFE COUNT 1978/84 .

FOX.
ROE DEER.
RABBIT.
STOAT.
WEASEL.
GREY SQUIRREL.
MOLES.
HEDGEHOG.
VOLE.
MUNJAC DEER.



SCHMIDT No. 6.

TREE COUNT 1976/84.

POPLAR (LOMBARDY).	SILVER FIR.
POPLAR (BALSAM).	RED CEDAR. (MUYA)
OAK (HOLM).	ASH.
FIELD MAPLE.	WESTERN HEMLOCK.
SILVER BIRCH.	ASPEN.
SMALL LEAVED LIME.	WILLOW. (GOAT).
HAWTHORN.	WELLINGTONIA.
CRAB APPLE.	NORWAY SPRUCE.
HOLLY.	LARCH. JAPANESE
ELDER.	SYCAMORE.
BLACKTHORN.	SCOTS PINE.
CHERRY.	ALDER.
CHESTNUT (SPANISH).	POPLAR (BLACK)
CHESTNUT (HORSE).	ENGLISH OAK. (PEDUNCULATE).
	CORSICAN PINE.
	ENGLISH OAK. (SESSILE).

CLIMBERS.

IVY.
 OLD MAN'S BEARD.
 HONEYSUCKLE.

WILD FLOWER COUNT 1978/B4 .

SNOWDROP.	GREATER STITCHWORT.	SANDWORT.
DOGS MERCURY.	LESSER " "	BEDSTRAW.
PUSSY WILLOW (SHRUB)	RANSONS.	GUELLER ROSE.
CHICKWEED.	SPEEDWELLS. (VARIOUS)	ARCHANGEL.
STITCHWART.	BLUEBELL.	WOUNDWORT.
SHEPHERDS PURSE.	BUGLE.	STINGINGNETTLE.
GROUNDSEL.	STONESBILL.	WILD PANSY.
RED DEADNETTLE.	FORGET ME NOT.	DEWBERRY.
SPOTTED DEADNETTLE.	DOG DAISY.	BLACKBERRY.
WHITE DEADNETTLE.	SANICHE.	RHODODENDRON.
DAISY.	RED CAMPION.	HOGWEED.
CARSEFOOT.	MARSH MARIGOLD.	GOOSE GRASS.
GLOE (BLACKTHORN).	BUSH VETCH.	HEMLOCK.
LESSER CELANDINE.	HERB ROBERT.	BROADLEAF DOCK.
PERIWINKLE (2 VARIETIES)	LADY'S MANTLE.	YARROW.
VIOLET.	WAYFARER.	CLARY.
PRIMROSE.	ROWAN.	GREAR PLANTAIN.
IVY.	HEDGE MUSTARD.	LESSERSPEARWORT.
LADYS SMOCK.	PIGWEED.	COMMON MALLOW.
DAFFODIL.	CRANESBILL.	CATS EAR.
STINKING IRIS (GLADDON)	HERB BENNETT.	DOG ROSE.
WOOD SORREL.	BIRDSFROT RUEFOIL.	IRIS.
WOOD ANEMONE (WILDFLOWER).	CUCKOO PIPT.	THISTLES (VARIOUS)
BUTTERCUP.	COMPREY.	WILLOWHERB.
COWSLIP.	YELLOW PIMPERNEL.	WATER PEPPER.
DANDELION.	RED "	BULRUSH.
GROUND IVY.	CROWFOOT.	HEMP NETTLE.
DOG VIOLET.	STARWORT.	HONEYSUCKLE.
WILD STRAWBERRY.	PEARLWORT.	MARSH WOUNDWORT.
RANUNCULAS.	SILVERWEED.	WATER DOCK.
TOWN HALL CLOCK (ADOXA)	HOP TREFOIL.	DEVILS BIT SCABIOUS.
RAGWORTS.	WHITE CAMPION.	
RAPE.	CUT-LEAF CRANESBILL.	
COW PARSLEY.	WOODY NIGHTSHADE.	
SUN SPURGE.	BLACK MEDICK.	
WOOD SPURGE.	SHEPERS PURSE.	
GARLIC MUSTERD.	RIBWORT.	

GREAT ALDER WOOD.

SCHEDULE No.4.

STREAM FISH 1984.

BROWN TROUT.

POND FISH (INTENDED).

CARP.

TENCH.

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.

THE STEYNING QUARRY ACTION GROUP RESPONSE TO THE SOFT SAND REVIEW

Introduction

This objection to the inclusion of the Ham Farm Site in the Soft Sand Review has been prepared by the Steyning Action Quarry Group (SQAG) and is supported by a petition of more than 2000 written signatures to date (previously submitted to County Hall Chichester) and 1600 online signatures

As outlined in SISSR, page 4:

"The Authorities have identified five guiding principles that, if required, will be used to select sites to meet the identified shortfall. "

SISSR, page 18, paragraph 4.9 says:

"Although sites within the shortlist may be judged to be 'acceptable in principle' for site allocation, there is a need to identify how they should be selected, if required, in accordance with the preferred strategy. The JMLP contains guiding principles (see paragraph 7.1.6) that have been used to shape the following principles for the selection of soft sand sites:

- First Principle: Places where there are opportunities to restore land beneficially.
- 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: Sites that have good access to the Lorry Route Network (LRN).
- Fourth Principle: The need to conserve and, where possible, enhance protected landscapes in the plan area.
- Fifth Principle: A preference for extensions to existing sites rather than new sites, subject to cumulative impact assessments."

Assessment of HAM Farm Site:

The assessment of the Ham Farm site is given on pages 82 to 91 of the 4SR. In principle, a red score would rule out a site from further consideration, although three of the shortlisted sites have a red score, the Ham Farm site has no red scores but three red/amber scores. We believe that these scores should be moved to red as per the objections set out below:

Health and Amenity

"Strategic Objective 6: To protect, and where possible enhance, the health and amenity of residents, businesses and visitors.

The Second Principle is contravened in the case of the residences near to or adjacent the Ham Farm site.

Paragraph 22, page 14, in the National Planning Policy Framework Technical Guidance (March 2012) says:

"In some circumstances, new or extended permissions for minerals extraction close to residential property may not provide adequate protection. In such cases, it may be justified to consider adequate separation distances. Any such distance should be effective but reasonable, taking into account:

- the nature of the mineral extraction activity (including its duration);
- the need to avoid undue sterilisation of mineral resources, location and topography;
- the characteristics of the various environmental effects likely to arise; and
- the various amelioration measures that can be applied.."

It would be impossible to mitigate the adverse impacts on the adjacent and near-by properties, without an adjacent area being left undeveloped on a part of the site between the residences and the workings, preferably at least 100 metres. This would reduce the viability of the site.

The Ham Farm site would have adverse impacts on the amenity of nearby residents and so contravene Strategic Objective 6. The site would also not comply with Strategic Objective 7 (which is the same as the statement above from the Vision).

The red/ amber score given to amenity seems an understatement in relation to the impacts on the properties adjacent and near to the site. It should be red.

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 of the Joint Mineral Plan).

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.

WSCC have failed to consider the inevitable impact of artificial 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.

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.

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).

Unacceptable impact on landscape:

The Vision is set on page 14 of the Adopted Plan. The following statements are relevant here:

"Will be a place where minerals are produced in ways which conserve and enhance the beautiful outdoors of West Sussex, including the special qualities of the South Downs National Park and Areas of Outstanding Natural Beauty, for the benefit of current and future generations.

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."



(View of the site from the South Downs)

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.

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.

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.

Viability of Ham Farm Site

National Planning Practice Guidance

4SR, page 4, paragraph 2.4 says:

"In terms of identifying minerals sites, government guidance set out within the national Planning Practice Guidance advises that this should consider the following:

The presence of viable resources

Support from landowners for minerals development

Acceptability, in planning terms. '

WSCC have previously argued that operator interest is an indicator of viability of site extraction. On page 84 of the 4SR, they state that the deposit has been tested and the operator is interested in delivering the site. However, no direct proof of the viability of the Ham Farm site is given in the 4SR.

Unreliability of Bore Hole Testing:

As stated in our previous report, the above borehole sample, taken within the new boundary, contradicts claims made by the operator regarding sand deposits. The WSCC Planning Officer previously advised at a public meeting that 500000 tonnes of sand could be extracted from the original proposed site; this was then revised to 850000 tonnes. We therefore question the reliability of the revised forecast of 725000 tonnes of sand from a significantly smaller and elongated site.

Despite numerous FOI requests for copies of the mineral survey have so far been refused by WSCC, the report had arbitrarily been labelled 'commercially sensitive' by council officers. It is strongly contested that this information is commercially sensitive to a degree that it cannot be disclosed. The needs of the local community should be carefully weighed against the potential operator in this regard. In the interests of transparency, the Committee should insist that the report is made available.

1063 Wt. 22438/0384 10x 7/45 (51) F.&S. (For Survey use only) N.1678
 1-inch Map Registered No.

RECORD OF WELL (SHAFT OR BORE)

At HAM FARM
 Town or Village STEYNING
 County SUSSEX Six-inch quarter sheet L1. NE. 1/4
 For Mr. WISTON ESTATE

Exact site of well 7/8 mile NE of Wiston House
200 ft S of Farm Buildings see Sketch Attach a tracing from a map, or a sketch-map, if possible.

Level of ground surface +116 If well-top is not at ground level, state how far ... above; below; ... ft.
 above sea level (O.D.) 120 approx ft.

SHAFT _____ ft.; diameter _____ ft. Details of headings _____

BORE 125 ft.; diameter of bore: at top 6 ins.; at bottom 4 ins. Lengths, diameters, perforations, etc., of lining tubes 6 I.D. surface to 108'
4" perforated & gauge covered from 105' to 125'

Water struck at depths, below well top, of (feet) about 108'

Rest-level of water 20 ft. above well-top. Suction at 72 ft. Yield on 8 hours' pumping, 360 gal. per hour with depression to 72 ft. below well-top, Capacity of pump 400 g.p.h. Recovery to rest level in _____ mins. Date of measurements March 1948 Date of well March 1948

Quality of water (attach copy of analysis if available) _____

Well made by Duke & Ockenden Ltd

Information from DUKE & OCKENDEN, L^{TD} LONDON AND LITTLEHAMPTON

Additional notes in space overleaf.

(For Survey use only) GEOLOGICAL CLASSIFICATION	NATURE OF STRATA	THICKNESS		DEPTH		
		Feet	Ins.	Feet	Ins.	
	If measurements start below ground surface, e.g., from bottom of an existing shaft, state how far					
Drift	Soil	1	6	1	6	
	Brown Clay & Gravel	6	6	8	0	
G	Clay (Chocolate Colour)	2	0	10	0	
	Blue Clay	50	0	60	0	
	Grey Sandy clay	30	0	90	0	
	Dark Brown sandstone	5	0	95	0	
FB	Light Brown sandstone	2	0	97	0	
	Sandy Clay	4	0	101	0	
	Dark Brown Sand	4	0	105	0	
	Grey Sand.	20	0	125	0	
AJ 28.11.46	Analysis					
	Total Solids			14.0	200 ppm	
	Chlorine			1.6	27.5	
	Ammonia			0.0019		
	Albumenoid Ammonia			0.0006		
	N. as Nitrate & Nitrite			Absent		
	Iron			present in quantity		
	Total hardness (Clark's scale)			9.6		
	Continued over leaf					P.T.O.

GEOLOGICAL SURVEY AND MUSEUM, SOUTH KENSINGTON, LONDON, S.W.7.	Date received <u>26.5.48</u>	Correspondence File No.	1" N.S. Map No. <u>318</u>	1" O.S. Map No.	Site marked (use symbol on 1" Map on 6" Map) <u>0</u> <u>0</u>
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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 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 and links this site to the Domesday record, confirming the necessity for a thorough archaeological site investigation.

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.

These watercourses all ultimately drain into the River Adur. Therefore, associated polluted water will 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 Dunstons 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.

Transport

We do not accept that the assessment of this site for Highways purposes is green and believe it should be red.

The traffic analysis fails to take important issues as follows:

Additionally, it is near the Wiston bends themselves, which are exceptionally dangerous and are crumbling and require widespread support and enhancement to make them safe.

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 and is just round a blind bend. The bend is so close to the entry point, it would be incredibly dangerous. 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.

Since the Shoreham air disaster, which resulted in closure of the A27, there has been a marked increase in traffic on the A283 at peak times. The original traffic created by this proposal compromises the safety of all users and especially the school coaches and parents cars.

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. 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.

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).

CONCLUSION

To conclude we ask that the inclusion of the Ham Farm site within the Soft Sand Review be immediately removed on the following grounds:

- An unacceptable loss of amenity to local residents.
- The huge adverse and dangerous impact on the users of the A283.
- The reduction and elongation of the site, along with the borehole evidence that we have submitted showing no sand to a depth of 100 feet, will inevitably lead to a reduction in the amount of sand available, contrary to the operator’s prediction.

- WSCC is unable to safeguard the streams and springs in the area of the proposed site, which form part of the tributary network of the River Adur and feed Alderwood Ponds.
- **This proposal has been comprehensively considered by the Environmental and Community Select committee and overwhelmingly rejected!**

WEST SUSSEX SOFT SAND REVIEW: ISSUES AND OPTIONS

Please complete and return this form to Planning Services, West Sussex County Council, County Hall, Chichester, PO19 1RH by **18 March 2019**. Visit our website for further information: www.westsussex.gov.uk/mwdf.

Data Protection/Privacy: West Sussex County Council is registered as Data Controller(Reg. No. Z6413427). For further details and information about our Data Controller, please see www.westsussex.gov.uk/privacy-policy.

PART A: PERSONAL INFORMATION

A1. Personal Details

Name

Job Title (where relevant)

Organisation or affiliation (where relevant)

A2. Client Details (if applicable)

If you are completing this form on behalf of someone else then please provide details of the person(s) or organisation you represent.

Name

Job Title (where relevant)

Organisation or affiliation (where relevant)

A3. Contact Address Details

Please provide details of the person who should be contacted regarding this response

Address

Telephone

Email

Preferred Method of Contact

Post

Email

Please tick all categories below that most adequately describe you.

Resident

Local Business

Minerals or Waste Industry

Landowner

Parish/Town Council

District/Borough Councillor

County Councillor

Local Authority

SDNPA Member

Government Organisation

Non-Government Organisation

Other (please specify)

If you submit a consultation response, your contact details will be used to automatically notify you of updates with regards to the soft sand review and minerals and waste planning policy. Please tick the appropriate box if you **DO NOT** wish to be notified of the following.

Progress and consultation on the Soft Sand Review

Any further updates about Strategic Waste or Minerals Planning in West Sussex

Part B: Issue 1

Question 1A Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

The Review considers the identified need for soft sand during the period 2018-2033 – a fifteen-year period.

The Review should use Demand Forecast Scenario 3 to ensure that if the highest level of demand occurs, during the Plan period, sufficient provision has been, through allocated sites to meet this demand. Demand Forecast Scenario 3 identifies a shortfall of 2,832,887 tonnes.

The NPPF 2019 paragraph 207f requires MPAS to maintain landbanks of at least 7 years for sand and gravel and at least 10 years for crushed rock, whilst ensuring that the capacity of operations to supply a wide range of materials is not compromised.

The footnote to this clause states that longer periods may be appropriate to take account of the need to supply a range of types of aggregates, locations of permitted reserves relative to markets and **productive capacity of permitted sites**.

CEMEX therefore consider that the review should not only make up the shortfall under the highest demand scenario – scenario 3 – but that at 2033 the plan should ensure that provision is made to ensure at least a 7-year landbank of 3,724,590mt at the end of the plan period.

In addition, the total shortfall in the table in paragraph 2.9 appears incorrect for Demand Forecast Scenario 3. The total current requirement under Scenario 3 is 5,586,887 tonnes. The current reserves are 2,745,000 which means that the shortfall should be 5,586,887-2,745,000 tonnes which means the shortfall is 2,841,887 tonnes.

Question 1b) Do you think that there are any matters that should be taken into account when determining the need for soft sand.

As stated above the existing productive capacity of existing soft sand sites should be a consideration in whether annual demand for soft sand can be met and the lifetime of existing sites should also be a consideration. A number of the existing permitted sites are at the end of their working life.

In addition, in understanding need to be met by West Sussex the potential availability of supplies from elsewhere should also be taken into account. This should be where resources and reserves are in relation to the markets in and around West Sussex. The Inspectors Report paragraphs 23-33 outline that the soft sand resource in West Sussex and the SDNP is of local and regional importance and that there cannot be a reliance on imports from Kent, Oxfordshire, Hampshire or Surrey to meet any shortfall over the plan period. CEMEX consider that WSCC cannot put weight on importing soft sand from these areas – as importing sand into the county when there are resources available is not sustainable. In addition, the resources in these areas may also be located within protected or designated areas. If West Sussex thinks that soft sand material can be worked beyond the county boundary and imported sustainable – then evidence needs to be provided to demonstrate this.

1C Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide evidence to support your view.

As set out in 1a CEMEX consider that the MPAs should plan for Demand Scenario 3 and make provision to ensure that at the end of the plan period that they have sufficient soft sand permitted to maintain the 7-year landbank.

The highest demand scenario should be provided for because of future housing growth in West Sussex and the surrounding market area that it supplies – but also to provide a cushion if not all identified resources are available to be worked. The Sites included in the plan will have an identified reserve, but detailed assessment at the application stage may mean that not all the soft sand resource can be worked, because of mitigation measure stand-offs or because detailed assessment of the site at the application stage, may mean that the application does not gain planning permission. Making provision for the highest demand scenario and also allowing for a 7-year landbank at the end of the plan should cushion any shortfall that results from the above.

Part C Issue 2

Question 2A: Do you consider that all reasonable alternatives for soft sand supply have been identified or are there any other options that we should be considering?

CEMEX are satisfied with the Options A-E that are being considered as part of the review. West Sussex will need to provide evidence for the option it progresses and demonstrate from a strategic environmental perspective why the option is sustainable. Evidence will need to be provided as part of this review.

Question 2B: Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Option A: Supply from sites within West Sussex but outside of the National Park.

CEMEX have no objection to this Option A, but the site assessment work carried out previously by the authorities for the minerals plan revealed that there were insufficient suitable sites outside of the SDNP to meet even a low demand forecast. In conclusion this Option A cannot be used alone.

Option B: Supply from sites within West Sussex, including within the National Park.

CEMEX support this Option B and consider this is the most sustainable and deliverable option. CEMEX consider that there may be some sites that can be worked beyond the SDNP, but that there are suitable soft sand sites within the SDNP which can be worked sustainably without significant harm to the character and purpose of the SDNP designation. Indeed, CEMEX consider that certain sites can be selected where through their restoration they could bring enhancement and gain to the SDNP whether through delivering increased biodiversity or informal public recreation.

Option C: Supply from areas outside West Sussex

CEMEX recognise that there are soft sand resources in the South East Region, beyond the county of West Sussex, but they question the sustainability in importing soft sand resources beyond the MPA area. CEMEX consider that there is workable resources within the area, including the SDNP, which can be worked without significant impact, where the overall impact for the region would be more sustainable.

Paragraph 3.18 of Option C discusses the transportation of minerals over long distances but in assessing this option WSCC and the SDNPA must consider – air quality issues from transporting sand resources over longer distances by road and also the associated energy impacts required to fuel road transport. Air quality at the current time is an important consideration in planning in terms of the environment and the health impact on communities alongside HGVs routes.

Paragraph 3.19 also mentions preparation of a Position Statement by other MPAs in the South East on soft sand. Whilst it is acknowledged that much of the soft sand resource in West Sussex is found in the SDNP, soft sand in other authority areas is also in designated landscapes such as AONBs. Whilst designated landscapes are a consideration in assessing the allocation of soft sand sites – it is only one factor which should be considered. Other factors need to be weighed and balanced against any impact that may be caused to the landscape designation. Indeed, as stated above there may be potential soft sand sites within the SDNP where mineral can be extracted without significant long-term adverse harm to the designated landscape and where through restoration long term benefits to the landscape can be secured.

If this Option C is pursued alone or in conjunction – evidence will need to be provided that this is strategically sustainable in relation to the other options.

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

CEMEX dispute at that marine dredged material can be considered as a suitable viable alternative to land won soft sand. It does not preclude a suitable alternative product to land won soft sand at the current time. Even if in the future a marine alternative product could be secured, this would require significant new land to be allocated at wharf to land and store the material won and for new dredger capacity to be delivered.

Option E: A combination of the above options

See answer to Q2c below

Q2c: Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

CEMEX consider that Option B should be taken forward first. The Inspectors Report indicated this approach too. The Authorities need to assess this option first to assess what resource is available within the SDNP and beyond and what the impact will be from the sites available and what the harm will be. The Authorities need to prepare this assessment in a positive way.

Q3 Do you have any comments on the draft Sustainability Appraisal Options?

CEMEX question the assessment of the options. CEMEX question the SA score for Option B under SA Objective 5. It has been scored as Significant Adverse when other factors have been scored as uncertain positive negative. For example Option C under SA Objective 5 has been scored in this way. This seems less comparable and a localised approach to assessing sustainability.

In assessment of Option D Objective SA5 – is given a positive score – but no wider strategic consideration is given to the fact that it may result in designated landscapes elsewhere being worked for soft sand.

It is unclear why the assessment of Option A and Option B varies in scoring the SA objectives. Both assess the working of sites in West Sussex and therefore the impacts should be similar, the only key difference will be when assessing SA Objective 5 which seeks to protect and enhance landscape character etc. It is accepted that Option B would score more negatively than Option A, however the significance of Impact for Option B may not be significant adverse in certain locations within the park and a split score of minor-negative to significant negative or to mixed may be fairer.

Similarly, it is unclear why a different score is given for SA6, SA9, SA14 between these options and the difference in the comments made in the justification column.

The assessment of Policy Option C – whilst assessing the impact of soft sands elsewhere beyond West Sussex may be considered positively against the SA objectives which are weighted to assessing impacts on West Sussex. In overall sustainability terms working soft sands beyond the MPA area may be less sustainable because of transport and air quality issues and environmental designations covering soft sand resources elsewhere. The SEA and sustainability appraisal do not assess in the wider context of sustainability for the SE Region the impact of working soft sand elsewhere in the south east. Undertaking the assessment against local sustainability criteria fails to consider the strategic environmental impacts of Policy Option C.

Issue 3

Q4: Do you have any comments on the site selection methodology, as set out in the Soft Sand Report (4SR)?

No comments on the methodology at the current time.

Q5: Do you have any comments on the nine shortlisted sites identified in the Issues and Options Consultation Document?

CEMEX will only comment on its own site – “East of West Heath Common” CEMEX dispute the assessment that it has **low** capacity for accommodating mineral extraction. CEMEX consider that the site is low lying within the SDNP. Within an area where there are existing detracting visual factors - electricity pylons. There are no footpaths in the immediate vicinity of the site and no residential properties with immediate views of the area. The boundaries of the site are well screened with dense boundary vegetation.

Q6: Do you have any comments on the 12 non-short-listed sites as identified in Appendix 3 of the Soft Sand Site Selection.

CEMEX has no comment on these.

Q7: Are there any other sites that we should be considering that are not included in the Soft-Sand Site Selection Report?

CEMEX has no other sites to promote currently.

Q8: Do you have any comments on the sustainability appraisal of the potential sites?

CEMEX consider that in relation to SA objective 1 - the long term working and restoring east of West Heath has the potential to enhance health and well-being and amenity for residents and neighbouring land users and visitors to West Sussex by providing a site with increased public access, increased biodiversity and improved informal recreation for the residents and visitors to West Sussex.

CEMEX also consider that in terms of the SA objective 5 that working East of West Heath could have a neutral to positive impact on the landscape, local distinctiveness of the local landscape character. Working and then restoring the site would provide CEMEX with the opportunity to protect and local boundary vegetation, but also to provide a water feature which historically have been part of the local landscape in this area. CEMEX do not consider that the final restoration scheme will have a negative effect of the distinctive character of the site locally.

Finally, in relation to SA objective 6 CEMEX consider that the site through restoration can secure a net gain in biodiversity and natural habitats and protected species. Net gains are secured at many of CEMEXs mineral restoration schemes. CEMEX would certainly be looking to secure this as part of balancing working a site in the SDNP.

**Q9: 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 sites?**

Not at the current time.



[REDACTED]

[REDACTED]

Dear Mr Elkington

Soft Sand Review of the West Sussex Joint Minerals Local Plan: Issues and Options Public Consultation (Regulation 18) January 2019

Thank you for giving Kent County Council the opportunity to comment on the above Issues and Options Regulation 18 consultation in respect of the Soft Sand Review of the West Sussex Joint Minerals Local Plan 2018-33 (the Plan).

Kent County Council is aware of how the distribution of the soft sand (Folkestone Formation) mineral resource in the South East of England is often coincident with the sensitive landscapes of the Region and in particular its Areas of Outstanding Natural Beauty and National Park designations. The result of this is that there is an unavoidable tension between the need to plan for “*a steady and adequate supply of aggregates*” as required by NPPF para. 207 and the requirements within chapter 15 of the NPPF which includes the need, set out in para. 170, for policies to “*contribute to and enhance the natural and local environment*”.

In addition to the need to deliver sustainable development, the NPPF also expects (at para. 26) that ongoing and effective joint working between policy making authorities will take place as an integral part of the production of a positively prepared and justified strategy. Para. 35 of the NPPF makes clear that a plan that is positively prepared has a strategy that as a minimum seeks to meet an area’s objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development. Furthermore, for a

plan to be effective it needs to be deliverable over the plan period and based upon effective joint working on a cross boundary strategic matters that have been dealt with, rather than deferred, as evidenced by a Statement of Common Ground.

It is recognised in para. 172 of the NPPF that great weight should be given to conserving and enhancing the landscape and scenic beauty in National Parks, and major development should be refused planning permission other than in '*exceptional circumstances*' where it can be demonstrated that the development is in the public interest.

It is clear that in West Sussex the Folkestone Formation is predominantly, though not exclusively, within the South Downs National Park Authority area. This understandably represents a significant challenge to the two mineral planning authorities (West Sussex County Council and South Downs National Park Authority) to balance the need to plan for mineral resources and protect the landscape character of the National Park. This is the key issue that has to be addressed. The Regulation 18 public consultation documentation makes this point clear. Underpinning any consideration of resolving this tension is an understanding of the quantum of soft sand required to meet future demand for the mineral.

West Sussex County Council have, it is noted, analysed this and have produced a Local Aggregate Assessment (LAA) in January 2019 that not only considers the 10-year rolling averages but also '*local circumstances*' to assess soft sand need. In this case housing requirement projections. The LAA considered three scenarios, as follows:

1. 10-year sales average alone over the 15 years (the Plan period 2018-33) gave a requirement of 4.406 million tonnes (mt) minus current reserves of 2.745mt resulting in a **shortfall of 1.66mt**;
2. 10-year sales average over the Plan period and a 26.8% increase in housing growth that is assumed to be using 91% of the additional aggregates giving a requirement of 5.480mt minus current reserves of 2.745mt resulting in a **shortfall of 2.73mt**
3. 10-year sales average over the Plan period and a 26.8% increase in housing growth that is assumed to be using 100% of the additional aggregates giving a requirement of 5.586mt minus current reserves of 2.745mt resulting in a **shortfall of 2.83mt**

The spread of the shortfall anticipated over the Plan period is therefore between **1.66mt** and **2.83mt** to 2033. Kent County Council is aware that the West Sussex County Council LAA has been considered by the South East Aggregate Working Party (SEEAWP) in November 2018 and was considered a robust document in understanding the overall need for soft sand in the county into the future. In the absence of further evidence, Kent County Council considers it highly unlikely that the projected increased housing development would correlate to an exactly proportionate increase in the need for additional soft sand as suggested by scenario 3. Therefore, the range in the soft sand is more likely to be between **1.66mt** to **2.73mt** up to 2033.

The possible option variations to meet the identified need has been set out in the Issues and Options Consultation document and set out below. Views are sought on the proposed options.

- **Option A:** Supply met from sites in West Sussex but outside the Park (there are two sites - Ham Farm (new site) and Buncton Manor Farm (new site) yielding a total of **1.725mt**)
- **Option B:** Supply to be met from sites in West Sussex including those within the National Park, including Buncton Manor Farm (new site), Ham Farm (new site), Chantry Lane (extension), Coopers Moor (extension), Duncton Common (extension), East of West Heath Common (extension), Minsted West (extension), Several East (new site) and Several West (new site) yielding a total of **10.025mt** [if Several West is a 1.0mt yielding site] to **12.025mt** [if Several west is a 3.0mt yielding site].
- **Option C:** Supply from areas outside West Sussex.
- **Option D:** Supply from alternative sources including marine-dredged material, and
- **Option E:** A combination of **Options A to D** (yield indeterminate).

Option A – it is recognised that this option would only be sufficient to meet the lower end of the soft sand aggregate need projection of 1.66mt up to 2033. Therefore, it is considered by Kent County Council that if only the identified sites outside the National Park were to come forward as future allocations these would not meet the upper estimates of objectively assessed needs over the Plan period.

In light of the above, sites within the National Park should be fully investigated, in accordance with **Option B**. There is between **8.30mt** to **10.30mt** of potential reserves in sites promoted and identified as the reasonable alternatives on the 'shortlist' falling within the National Park as shown in Appendix A of the consultation document. These sites are: Chantry Lane (extension), Coopers Moor (extension), Duncton Common (extension), East of West Heath Common (extension), Minsted West (extension), Several East (new site) and Several West (new site) yielding a total of **10.025mt** [if Several West is a 1.0mt yielding site] to **12.025mt** [if Several West is a 3.0mt yielding site as opposed to a 1.0mt yielding site].

Assuming both the non-National Park sites are acceptable in principle as future allocations, then there would be no need for sites to be allocated in the National Park to meet the lower **1.66mt** identified need. In practice, this option would provide a **0.065mt** surplus. To meet the **2.73mt** higher range of need, then **1.005mt** would be required over the Plan period. Therefore, the '*worst case scenario*' in terms of potential adverse environmental impact on the National Park by quarrying development in **Option B** could be met by essentially any one of the sites identified in the 'short list' alone.

Option C considers landwon resources in other administrative areas as a future source of supply to compensate for any shortfall in West Sussex's plan requirements.

The other resources in the South East that may be suitable are identified as the Folkestone Formation (in East Sussex, Surrey, Hampshire and Kent) the Corallian Group (in Oxfordshire) and the Reading Beds (mainly in West Berkshire). Option C is for other areas with fewer landscape constraints to take up supply requirements in more constrained areas. These potentially alternative areas should be fully explored before it can be concluded that this option is a viable one. This should be done in accordance with the NPPF (including para. 27) and the duty to demonstrate effective cooperation between authorities. At this time, this is an ongoing matter between respective authorities which are working towards a statement of common ground. In addition, the Minerals Planning Authorities of South East England are currently preparing a Soft Sand Position Statement.

In considering this option it is important that transportation is identified as a key issue, as the greater the distance soft sand has to travel the greater the unit costs per tonne of mineral and the greater the transport related environmental impacts.

Option D considers the potential for non-land-won alternatives to traditional sources of supply used to meet soft sand need. Marine dredged materials are, we understand, capable of meeting a 'soft sand' specification and there are recorded landings of this material in the South East. The amounts recorded show marked variability as follows:

- **2015:** 139,977 tonnes
- **2016:** 233,906 tonnes
- **2017:** 50,710 tonnes

In West Sussex it is stated that the average soft sand sales from wharves (2015-2017) was 21,846 tonnes (presumably per annum). These amounts are relatively insignificant compared to the land-won supply demonstrated by the 10-year average sales (land-won) of 293,737 tonnes per annum. Wharf landing in West Sussex therefore currently represents only 7.4% of the land-won sales per annum. In the absence of further evidence, it is considered by Kent County Council that it cannot reasonably be concluded that the marine resource has the potential to significantly supplant land-won supply in the short and medium term.

Option E makes clear that the authorities (West Sussex County Council and South Downs National Park Authority) will consider a combination of the above **Options A to D** in order to determine if such a combination would provide for a robust and deliverable strategy for soft sand supply over the Plan period.

As you are aware, Kent County Council has recently completed the Regulation 19 publication period for its Minerals Sites Plan. The County Council is now reviewing

the representations received but it considers that this is a sound plan and intends to submit this Plan for examination in April 2019. In respect of soft sand, the Plan proposes one site allocation at Chapel Farm, Lenham which would yield 3.2m tonnes to contribute to Kent's additional identified need of 2.5 tonnes meaning that 700,000 tonnes of material would be available for a wider region use.

In discussions relating to the Statement of Common Ground WSCC is seeking to have this material 'ringfenced' as contributing solely to West Sussex needs, however this may prove unrealistic. It is understood that this request for 'ringfencing' the 'surplus' reserve is a response to the West Sussex Joint Minerals Local Plan Inspector who, during the examination of this Plan suggested that such a mechanism was essential for the authorities to prove that material would definitely meet unmet demand previously met by sales from West Sussex and compensate for reductions in sales in West Sussex. However, KCC contend that this simply is not a practical approach to mineral planning as it ignores how aggregate is sold within a marketplace. However, in light of Kent's proximity to West Sussex, it is fair to say that it is possible that some reductions in sales in West Sussex could be compensated for by sales in Kent.

National policy on aggregate supply expects that authorities should, in the first instance, plan for meeting their aggregate needs from development in their own areas. Options which look to areas outside West Sussex for meeting requirements, should therefore only be turned to when it has been demonstrated that the objectively assessed need is unable to be met from within the county. This requires demonstration that sites within the National Park cannot come forward to meet the mineral plan requirements. In this regard I draw attention to the fact that 5 out of the 7 sites under consideration in the National Park are extensions which may present less environmental impact than new sites. In assessing this option, it is important to bear in mind that the maintenance of a '*steady and adequate supply*' of aggregates is clearly a matter of public interest given that there is a demonstrated need as shown by the LAA prepared by West Sussex County Council and the South Downs National Park Authority.

Therefore, it is Kent County Council's view that **Option B** should be fully explored and robustly proven that the sites cannot meet the aggregate requirements before pursuing **either Option C or E**. In drawing this conclusion, we note that under the '*worst case scenario*' requirement of 2.73mt over the Plan period, some 1mt would be required.

Notwithstanding these comments, it is acknowledged that West Sussex County Council and Kent County Council are currently working toward producing a Statement of Common Ground to address the strategic cross-boundary mineral matters (soft sand supply) that are relevant to an understanding of achieving and maintaining a steady and adequate supply of aggregates in both counties into the future.

I trust that clarifies Kent County Council's position on the public consultation on the Soft Sand Review of the West Sussex Joint Minerals Local Plan: Issues and Options

Consultation under Regulation 18. If you have any queries on this response or wish to discuss matters further, please do not hesitate to contact [REDACTED]

Yours sincerely

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Re: Soft Sand Review – West Sussex Joint Minerals Local Plan – Ham Farm, Steyning

You won't be surprised to know that I strongly object to you including Ham Farm in this allocation. I have reviewed the papers most carefully. My comments are as follows:-

SOFT SAND REVIEW –HAM FARM

Single Issue Soft Sand Review – Issues & Options Consultation (Reg.18), January 2019 – referred to hereafter as SISSR

Soft Sand Sites Selection Report, January 2019 – referred to hereafter as 4SR

The following comments relate only to case against the allocation of Ham Farm in the Plan.

Guiding Principles

SISSR, page 4 says:

"The Authorities have identified five guiding principles that, if required, will be used to select sites to meet the identified shortfall."

SISSR, page 18, paragraph 4.9 says:

"Although sites within the shortlist may be judged to be 'acceptable in principle' for site allocation, there is a need to identify how they should be selected, if required, in accordance with the preferred strategy. The JMLP contains guiding principles (see paragraph 7.1.6) that have been used to shape the following principles for the selection of soft sand sites:

- *First Principle* Places where there are opportunities to restore land beneficially
- *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* Sites that have good access to the Lorry Route Network (LRN)
- *Fourth Principle* The need to conserve and, where possible, enhance protected landscapes in the plan area

- *Fifth Principle A preference for extensions to existing sites rather than new sites, subject to cumulative impact assessments*”

It is clear that these guiding principles should be taken into account in the selection of the sites to be allocated in the Plan. **The Second Principle IS contravened in the case of the residences near to or adjacent the Ham Farm site.**

National Planning Practice Guidance

4SR, page 4, paragraph 2.4 says:

“In terms of identifying minerals sites, government guidance set out within the national Planning Practice Guidance advises that this should consider the following:

- *The presence of viable resources*
- *Support from landowners for minerals development*
- *Acceptability, in planning terms*”

In the past, WSCC have argued that operator interest is an indicator of viability of extraction. On page 84 of the 4SR, they state that the deposit has been tested and the operator is interested in delivering the site. **However, no direct proof of the viability of the Ham Farm site is given in the 4SR.**

Vision

4SR, page 5, paragraph 2.8 says:

“It is also important that the chosen sites are consistent with the JMLPs Vision and Strategic Objectives.”

There is no further mention of these tests in the 4SR.

The Vision is set on page 14 of the Adopted Plan. The following statements are relevant here.

“West Sussex:

Will be a place where minerals are produced in ways which conserve and enhance the beautiful outdoors of West Sussex, including the special qualities of the South Downs National Park and Areas of Outstanding Natural Beauty, for the benefit of current and future generations.

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 exploitation of the Ham Farm site is not consistent with these elements of the Vision.

Strategic Objectives

The Strategic Objectives are set out in Section 2.3 of the Adopted Plan. The following are relevant here.

“Strategic Objective 6: To protect, and where possible enhance, the health and amenity of residents, businesses and visitors.

Strategic Objective 7: To conserve and enhance the landscape and townscape character of West Sussex and the special qualities of the South Downs National Park and the local distinctiveness and character of the High Weald AONB and Chichester Harbour AONB and the settings of all protected landscapes."

The Ham Farm site would have adverse impacts on the amenity of nearby residents and so contravene Strategic Objective 6. The site would also not comply with Strategic Objective 7 (which is the same as the statement above from the Vision).

Assessment of HAM Farm Site

The assessment of the Ham Farm site is given on pages 82 to 91 of the 4SR. In principle, a red score would rule out a site from further consideration, although three of the shortlisted sites have a red score. The Ham Farm site has no red scores but three red/amber scores. **The red/amber score given to amenity seems an understatement in relation to the impacts on the properties adjacent and near to the site. It should be red.**

Mitigation

Paragraph 22, page 14, in the National Planning Policy Framework Technical Guidance (March 2012) says:

"In some circumstances, new or extended permissions for minerals extraction close to residential property may not provide adequate protection. In such cases, it may be justified to consider adequate separation distances. Any such distance should be effective but reasonable, taking into account

- *the nature of the mineral extraction activity (including its duration),*
- *the need to avoid undue sterilisation of mineral resources, location and topography,*
- *the characteristics of the various environmental effects likely to arise, and*
- *the various amelioration measures that can be applied "*

In order to mitigate the adverse impacts on the adjacent and near-by properties, some part of the site between the residences and the workings would need to remain undeveloped, preferably at least 100 metres. This would reduce the viability of the site.

Highways Issues

I have never accepted and still do not accept that the designation of this site for Highways purposes is "green" but I believe it should be either amber / red or red.

Although the site is adjacent to a designated lorry route, it nevertheless is just round a blind bend, in a 60 mph zone, on a well-used road. I believe that a right hand turn into the site would be required for lorries coming from the south as a minimum, together with widespread removal of trees to the north, towards the Wiston bends because there are only approx. 8 seconds between coming round that bend and the entrance.

Additionally, it is near the Wiston bends themselves, which are exceptionally dangerous and are crumbling and require widespread support and enhancement to make them safe.

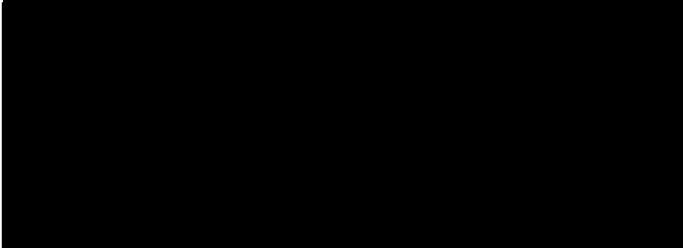
The traffic analysis fails to take these important issues into account properly.

Conclusion

I believe that Ham Farm is the wrong location for minerals extraction and that it will not be viable or deliverable in practice because of constraints.

Kind regards.

Yours sincerely



6th March 2019

Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-03-14 19:15:31

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

A2 Client Details if applicable

Title:

First name:

Last name:

Job title (where relevant):

Organisation or affiliation (where relevant):

A3 Contact Address Details

Same as details provided in A1

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Non-Government Organisation

Other:

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

No comment

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

No comment

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

No comment

Part C - Issue 2

2a Do you consider that all reasonable alternatives for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

No comment

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

No

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

Option D which avoids destruction of sensitive landscapes and offers the opportunity to use alternatives to road haulage.

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

No

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

no

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Ham Farm

Tick all the site boxes that apply (above) and provide comments below.:

This is a new site as opposed to many of the others which are existing. This does not appear to be reflected in the overall assessment and ignores the Fifth principle of the SISSR for the selection of sites: A preference for extensions to existing sites rather than new sites.

The extraction figures for this site appear uncorroborated by any independent study.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

No

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

No

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

We have previously commented on our opposition to the inclusion of the Ham Farm Site in 2016 and wish to add the following observations on the Review assessment:

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 a 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. There are an estimated 39 million day visits to the National Park.

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.

For these reasons we feel that adverse effect has been underscored and should be rated as highly vulnerable having regards to the impact on the tranquillity of the area, rural nature of the site, the visual impact on the National trail and SDNP.

Amenity

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 (you refer to a Ham Farm) offer courses, exhibitions which attract visitors from a wide area. Wiston House has an international 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.

Also within the close proximity of the site are a number of residents living in listed buildings whose enjoyment of their homes would be seriously affected.

This aspect alongside the comments above contradict Strategic Objectives 6 and 7 of the plan.

The economic well-being of Steyning relies on attracting people to visit and settle in the area. Initial impressions of those approaching from this direction are easily influenced by such development. 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.

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. For these reasons we conclude that the current assessment is incorrect.

Conclusions

The impacts have been seriously undervalued. 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 the easy access to the South Downs which offer openness, naturalness, lack of noise and distant views. The proposal will result in visibility and disturbance to the natural landscape, noise and light.

In addition the lives of those living close to the site will be seriously affected and this impact would be incapable of being Mitigated against.

In conclusion the Steyning & District Community Partnership seeks removal of the Ham Farm site from further versions of the mineral plan.

Please refer to our previous response in 2016 with regard to photographs, impact on tourism and excessive traffic congestion.

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)?

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)?:

As previously commented the selection criteria seems to ignore the guiding principles on Page 18 of the SISSR.

Part E - About You (The Equality Act 2010)

More questions About You

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[REDACTED]

[REDACTED]

To whom it may concern,

Further to our Parish Council meeting on 4th March where the Soft Sand Review was discussed, Duncton Parish Council (DPC) would like to submit the following comments in response to the Soft Sand Review Consultation.

The comments below are in response to question 5 on the Response Form and are concerning the Coopers Moor and Duncton Common sites.

- The noise, light and air pollution generated by the existing sand pit at Heath End is ongoing and an extension of the current site into these new locations will make the closure, and importantly, the promised regeneration, of the Heath End site less likely.
- The cumulative social and economic impact of this long-term development on the surrounding area is unjustifiable considering the area has already suffered from mineral extraction at Heath End for a number of decades.
- The sand pit is a blot on the landscape in an area of outstanding beauty which is visible from higher ground in the National Park, not least from the viewpoint on Duncton Hill, which the SDNP considers of strategic importance. There would therefore be an unacceptable impact on landscape character.
- The level of heavy goods traffic would increase and the dangerous turning from the Graffham Road onto the A285 is not suitable to accommodate large numbers of lorries.
- Sites of Special Scientific Interest (SSSIs) have been identified by SDNP rangers in Duncton Common, including rare grasses.
- The proposed extraction sites are adjacent to a National Trust conservation area (Lavington Common and Plantation) where extremely rare fauna and flora, including reptiles and birds recognised by the RSPB as endangered species are known to be found.
- The Serpent Trail, which is a nationally recognised route featured in guide books and popular with walkers, runs through the middle of Duncton Common. It is regularly used for training purposes for the Duke of Edinburgh awards.

- The footpaths and key bridle ways running through the common are key links between the surrounding villages into the Petworth area.
- The local school uses both proposed sites for the formation of forest school leaders and forest school activities with its pupils.
- The development of the site has the potential to affect the amenity and recreational value of the adjacent areas.
- A reduction in the number of visitors to the area would have a severe adverse economic impact on such local businesses as The Cricketers and The Badgers pubs, the Graffham and Redlands campsites and the Heath End Farm shop.

Having lived with the existing sand quarry for many years, Duncton residents are very aware of the impact further developments would have. It is clear, moreover, that the extension of the current sand extraction site at Heath End into Coopers Moor and Duncton Common would have severe negative externalities on the lives of our parishioners, the environment, and the local economy.

As such, we suggest that the criteria set out by the West Sussex Joint Minerals Local Plan's Soft Sand Sites Selection Report from January 2019 would require both sites in our Parish to be excluded from consideration for minerals extraction.

Yours faithfully,

[Redacted signature]

[Redacted signature]

[Redacted signature]

Submitted to West Sussex Joint Minerals Local Plan Proposed Submission Draft Representations Period
Submitted on 2017-03-13 14:53:22

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

[Redacted text block containing multiple lines of blacked-out information]

Resident, Local Business

Other:

Part B - Representation

B1 Which part of the West Sussex Joint Minerals Local Plan does this representation relate to?

Policy No.:

M2 and M11

Paragraph No.:

Inset Map or Policies Map:

Other section (please specify):

Sustainability Appraisal

B2 Do you consider the West Sussex Joint Minerals Local Plan to be: (tick as appropriate)

Legally compliant or sound? - B2.1 Legally compliant?:

No

Legally compliant or sound? - B2.2 Sound?:

No

B3 Do you consider the Joint Minerals Local Plan to be unsound because it is not: (tick as appropriate)

Reasons for why plan is unsound - B3.1 Positively prepared:

Yes

Reasons for why plan is unsound - B3.2 Justified:

Yes

Reasons for why plan is unsound - B3.3 Effective:

Yes

Reasons for why plan is unsound - B3.4 Consistent with national policy:

Yes

B4 If you consider the West Sussex Joint Minerals Local Plan to be unsound and/or not legally compliant, please explain why in detail in the box below. Please be as precise as possible.

Reasons why plan is believed to be unsound and/or not legally compliant.:

Legal requirements not met

1. By Regulation 12(1) Environmental Assessment of Plans and Programmes Regulations 2012, the Council is required to prepare an environmental report, which identifies the likely significant environmental effects of implementing the plan and also the "reasonable alternatives taking into account the objectives and the geographical scope of the plan ...".

2. Having considered the EU Commission Guidance, Ouseley J held in *Herd v Broadland DC* [2012] EWHC 344 (Admin.) at [10] that a "reasonable alternative" is that which is:

"... realistic, fall within the legal and geographic competence of the authority, but it otherwise depends on the objectives, and geographical scope of the plan. Alternative areas for the same development are an obvious example. The longer term the plan, the more likely it will be that it is alternative scenarios which are examined."

3. Ouseley J continued at [69] that, "alternatives have to be assessed, whether or not to the same degree as the preferred option, all for the purposes of carrying out, with public participation, a reasoned evaluative process of the environmental impact of plans or proposals".

4. Within the sustainability appraisal, the Council expressly sets out that, in respect of soft sand, "only one policy option (SS2) was considered as a reasonable alternative option for soft sand". In truth, only one policy approach was assessed at all within the Sustainability Appraisal, and that is the strategy set out within policies M2 and M11, no alternatives were assessed to that preferred option, as is explained within the plan at para.6.2.15:

"The relevant strategic objectives are;

- To promote the prudent and efficient production and use of minerals, having regard to the market demand and constrains on supply in the Plan area.
- 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"

5. The reasoning for this approach is not set out within the Sustainability Appraisal, which is of itself a breach of the Regulations. Rather, it is hinted at within the draft plan at para.6.2.17 that no "exceptional circumstances" exist to extend the existing sites within the national park. Reference is then made, within a footnote,

to the Mineral Sites Selection Report (April 2015). This is where the reasoning is contained for not selecting any alternative options. The Report directs itself to whether “exceptional circumstances” exist to justify major development within the national park in accordance with paragraph 116 NPPF. The Report concludes at Appendix 7, para.2.40 and 2.41:

“2.40 The assessment of sites within the SDNP has concluded that, with appropriate mitigation measures, several sites could be developed for soft sand extraction without resulting in significant adverse impacts on the environment.

“2.41 From the evidence set out above, whilst there is an identified need for soft sand, on balance, the exceptional circumstances test has not been passed because there are suitable alternative supplies of soft sand available outside the South Downs National Park which would be able to contribute to meeting the estimated future demand for supplies.”

6. Accordingly, notwithstanding that the soft sand deposits are mostly within the national park, the national park is artificially excluded from the area of search for the new plan, not because there would be environmental harm, or that there is not a pressing need, but because other sites outside the County are available.

7. That conclusion however fails to appreciate the significant environmental harm caused by excluding the park from the area of search. As acknowledged within the Sustainability Appraisal, the exclusion of the park in favour of meeting the majority of the need from outside the County is likely to have a “significant negative effect” on SA objectives 10 (air quality), 13 (transport) and 14 (greenhouse gasses).

8. Development within the park would meet the Council’s stated objectives for the need for soft sand, with apparently significantly less environmental harm than the preferred option. It is thus a reasonable alternative to which the Council was obliged to assess to an equal degree within the Sustainability Appraisal.

9. The Council are therefore in breach of Regulation 12(1) of the 2004 Regulations by unlawfully failing to assess the reasonable alternative option of meeting the need for soft sand from within the park and supplying reasons for rejecting that alternative option. To the extent that the Council has assessed the reasonable alternative of allocations within the park, it is in any event unlawful, because: (i) it is not assessed to the same degree as the preferred option, (ii) the results are not set out within the sustainability appraisal alongside the preferred option and (iii), it is based on a flawed approach to paragraph 116 NPPF because it fails to take into account the significant adverse environmental effects of relying on meeting the need from outside the park. As it stands the plan does not therefore meet the legal requirements.

10. Accordingly, should the plan be adopted without a revised Sustainability Appraisal which meets the legislative requirements of assessing reasonable alternatives to the same degree as the preferred option, and takes into account the adverse consequences of meeting the needs outside the park within the paragraph 116 NPPF exercise, it is highly likely to be quashed upon an application by Mrs Harman (or other suitably aggrieved persons) under s.113 Planning and Compulsory Purchase Act 2004.

The policy is not sound

11. Further and alternatively, the soft sand strategy articulated through policies M2 and M11 is not sound, in as much as it relies upon meeting the need for soft sand from an allocation at Ham Farm, Steyning because:

a. The strategy is not “justified”, in that it is not the most appropriate strategy judged against the reasonable alternatives.

b. The strategy is not “effective”, in that there is no evidence it is deliverable over the plan period.

c. The strategy is not “consistent with national policy” because there are significant planning harms identified which, in the absence of evidence that mitigation is possible and deliverable, must compel a finding that the site is not “sound”.

(i) Strategy not justified or consistent with national policy

12. For the reasons set out above, on the Council’s own evidence, there is apparently a more “appropriate” strategy in the form of meeting the need from existing sites within the national park.

13. Overall the proposed Ham Farm allocation falls well short of the requirement at paragraph 158 and 182 NPPF to “ensure the Local Plan is based on adequate, up-to-date and relevant evidence ...”.

14. That strategy of development within the park would apparently avoid the following acknowledged harms for allocation of an entirely new site at Ham Farm:

a. Whilst Ham Farm is not itself within the national park, it is within 250m of the park itself and falls within a “valued landscape” to which paragraph 109 NPPF refers. The Council acknowledge that there would a “significant negative” effect on the landscape, local distinctive and landscape character.

b. Ham Farm is also adjacent to Ancient Semi Natural Woodland (Great Alder Wood). The Council acknowledge that there is the potential for “significant negative” effects of allocation, but suggest that a tree survey and arboriculture impact assessment should be submitted prior to a planning application. That approach is contrary to paragraph 188 NPPF which expressly requires that planning permission should be refused for 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”. Without a survey and impact assessment available now, the Inspector is unable to determine the impact upon this important objective of national planning policy objective, and therefore the soundness of the allocation.

c. The adverse impact on health, wellbeing on neighbouring residents is said to be “minor negative”. However, that planning judgment is simply perverse when it is acknowledged that Ham Farm is within 100m of residential properties and no evidence is referenced, either within the plan or Sustainability Appraisal, which suggests how adequate mitigation could be put in place to safeguard harm arising from, amongst other things, visual intrusion, smell, noise and dust, whilst maintaining the deliverability of the site. A rational judgment in the absence of that evidence would have scored this as likely to have a “significant negative” effect.

d. The impact on heritage assets is again acknowledged but said to be only a possible "minor negative". The Grade II Horesebrook Cottage is within 100m of the western site boundary, to the east, there is the Grade II listed Water Town and Sun Room at Wappingthorn (760m) and, to the south-west there is the Wiston Park Historic Parkscape. Again the Council attempt to put-off assessment of these impacts. That approach is unacceptable and the scoring irrational. In the absence of an assessment of the contribution made by the site to the significance of those heritage assets, it is impossible to say whether mitigation could be put in place which would avoid harm to them, and ensure the site remains deliverable. It should be born in mind that there is a very strong statutory presumption against the grant of planning permission which would fail to preserve the settings of listed buildings arising from s.66(1) Planning (Listed Buildings & Conservation Areas) Act 1990. A rational planning judgment would, in the absence of evidence, score the impact to be potentially "significantly negative" in light of that statutory duty.

e. The Council acknowledge that the Ham Farm site contains both Grade 2 and 3 agricultural land. Unfortunately, the Council has not ascertained whether the Grade 3 element is (3a or 3b). Even on the evidence the Council has managed to gather, the site contains "Best and Most Versatile" agricultural land. National policy is strict as to the loss of agricultural land. Paragraph 112 NPPF provides that:

"Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality."

The Council has failed to (i) demonstrate the use of Ham Farm is "necessary" and (ii), failed to demonstrate areas of poorer quality land have been considered in preference to Ham Farm.

f. The Council acknowledge that the allocation of Ham Farm has the potential to increase lorry movements through the Air Quality Management Area ("AQMA") in Storrington. The AQMA was designed in December 2010 by Horsham District Council and is aimed at reducing NO2 emissions to below the limit values imposed by the Air Quality Directive 2008/50/EC. Accordingly, Policy 24(v) Horsham District Planning Framework (2015) requires new development to "contribute to the objectives of local Air Quality Action Plans and do not conflict with their objectives". A draft action plan was published in October 2012. Article 4 of the Directive imposes a general obligation to "take any appropriate measure, general or particular, to ensure fulfilment of the obligations arising out of the Treaty or resulting from the acts of the institutions of the Union" and to "refrain from any measure which could jeopardise the attainment of the Union's objectives". Article 23 requires that any breach of the limit values is kept to a period "as short as possible". Accordingly, promoting a plan which could generate air pollution which could compromise the UK's compliance with the Directive until 2033, is a very serious matter. This is reflected within paragraph 124 NPPF:

"Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan."

The Council have failed to assess whether an allocation at Ham Farm could avoid Storrington altogether and still remain deliverable. In the absence of that evidence, the Inspector is bound to find M11 unsound because of its very likely breach of paragraph 124 NPPF arising from a failure to accord with the AQMA Action Plan.

Furthermore, and accordingly, policy M11 is in breach of Regulation 8(4) Town and Country Planning (Local Planning) (England) Regulations 2012 in that it is not consistent with the adopted development plan, namely, Policy 24 Horsham District Planning Framework (2015).

g. The Council acknowledge the presence of a surface water stream at the Ham Farm site. The Council again however rely on evidence coming forward at a later date to ensure there is no harm to water quality. There is no evidence to demonstrate that mitigation is possible or whether, with mitigation, the site remains deliverable. There is no summary of the response from the Environment Agency within the Regulation 18 round of consultation.

(ii) Strategy not effective

15. It is understood that the site is subject to a restrictive covenant, which is understood to restrict the uses to which the land may be put. There is no evidence from the promoter of the site, or at least no evidence referred to in the publically available supporting evidence, that the land use issue has been resolved with the owners of the benefitting land. In the absence of evidence of that resolution the Inspector must conclude the site is not deliverable.

16. Further and more generally, the total lack of proposed mitigation means that the Inspector cannot be satisfied that the site stands a reasonable prospect of obtaining planning permission in a form which would be deliverable.

Overall

17. For the reasons set out above, the Inspector is simply unable to conclude the site is "sound", presented with a total vacuum of evidence on the part of the Council in support of the allocation. In large part, the soundness of this site is based on little more than bald assertions within the Sustainability Appraisal.

18. The Council has failed to comply with the legal requirements of the 2004 Regulations and has failed to substantiate its assertion that the Ham Farm allocation would be sound with adequate (or in most cases, any) evidence. Should the Council proceed to resolve to submit this plan, based on its current evidence base, to the Secretary of State it would be at serious risk of finding itself in breach of the duty upon it at s.20(2) Planning and Compulsory Purchase Act 2004 which provides as follows:

"(2) But the authority must not submit such a document unless—

(a) they have complied with any relevant requirements contained in regulations under this Part, and

(b) they think the document is ready for independent examination."

B5 Please explain in the box below what change(s) you consider necessary to make the West Sussex Joint Minerals Plan legally compliant and/or sound. Please be as precise as possible.

Changes needed to make the Plan legally compliant and/or sound:

1. The Council should:

a. Undertake a Sustainability Appraisal which complies with the legislative requirements, in particular, produce a report which assesses meeting soft sand extraction from within the South Downs National Park on an equal basis to that of the preferred option.

b. Delete Ham Farm from policy M11

B6 Do you consider it necessary to attend and give evidence at the hearing sessions during the examination? (Tick as appropriate)

Yes, I wish to speak to the Inspector at the hearing sessions

B7 If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

Reasons why respondent wishes to attend hearing sessions:

1. Mrs Harman requests the opportunity of being heard before the Inspector examining the plan pursuant to s.20(6) Planning and Compulsory Purchase Act 2004 because:

a. Mrs Harman's objections are based on complex legal arguments which will be the subject of presentation at the examination by counsel; and

b. Mrs Harman is also likely to be supporting her objection with expert evidence from other planning professionals, such as (but not limited to): planning consultants, landscape architects, acousticians and/or transport engineers. Their evidence will be in the form of complex reports, about which, the Inspector is likely to benefit from an oral summary and questioning.

Would you like to make another representation?

No

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Response ID ANON-2TKJ-41T5-9

Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-03-08 12:29:18

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

Mr.

First name:

Sid

Last name:

Garner

Job title (where relevant):

Organisation or affiliation (where relevant):

Wiston Parish Council

A2 Client Details if applicable

Title:

First name:

Last name:

Job title (where relevant):

Organisation or affiliation (where relevant):

A3 Contact Address Details

Same as details provided in A1

Name:

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Email

Email address:

[Redacted]

Resident, Parish/Town Council

Other:

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

Within the fourteen year span of the projected need, and the three scenarios given, our estimate is that the shortfall of 1,652,062 is the nearest, as shown in scenario 1. However the demand from within West Sussex would be lower.

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

The nature of modern domestic building methods has moved towards timber and board insulated construction (rather than bricks and mortar) from DPC level in most cases and from first floor level in many. The use of rapid rise building methods does suit the West Sussex built environment.

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Given the existing estimates, the Authority should base further estimates on real and considered calculations of need, given they have the shape of building policy within the planning department.

Overstating the case for local sources becomes counter productive.

Part C - Issue 2

2a Do you consider that all "reasonable alternatives" for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

The identified sources within West Sussex and the Kent and Medway area are sound.

The continuing use of marine sand is to be fostered.

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

The 2017 figure of 50,710 tonnes for marine dredged sand is a significant drop on the figures for the preceding years, and may well reflect the declining demand from a slowed building industry.

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

In our view the selection of Option B alongside Option D giving a supply as at present, of building sand that is won from both sources. Option C is already in force, as the market dictates supply.

Sand from nearby Authority sources will continue to be used. (3.18)

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

The Sustainability Appraisal shows that the use of mixed sources is the presumed future path for both actual sand supply, and future policy.

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

The methodology for selection would pass as sound, however some of the selected short listed sites fall foul of some or all of the principles set out in paragraph 4.9.

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Bunton Manor Farm, Chantry Lane, Coopers Moor, Duncton Common, East of West Heath Common, Ham Farm, Minsted West, Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

Bunton Manor Farm. This site is listed in the Single Issue Soft Sand Review as a 23 hectare New Site. It is in fact an extension of the adjacent Rock Common Pit, having been subject to landfill and subsequent reclamation. The cellular nature of the terms of the landfill license having been breached over many years, due to fire within the buried waste, causing the cell membranes to fail and allowing the waste to mix and enter the water table.

Further leaching to the watercourse on Water Lane, Wiston is bound to occur should any quarrying take place.

The RAG rating at present would indicate that this site is not suitable for inclusion in the draft plan, or any future extraction strategy.

Chantry Lane. This would seem an ideal candidate due to deep deposits giving very high yield from a very small hectare, and is the continuance of an existing quarry operation.

Coopers Moor. An extension to the south the existing quarry operation at Heath End, now flooded. This could be a viable candidate for inclusion.

Dunton Common. As for Coopers Moor, an extension of an existing quarry, however estimates show a low yield for a large hectare of quarry.

East of West Heath Common. Although listed as an extension of West Heath, it is not adjacent, and West Heath operations appear to have ceased some years ago.

Ham Farm. The Ham Farm site is not suitable for development as a quarry. It sits upon the narrowest section of the Folkestone Formation of Soft Sand Resource, (including potential silica sand) Within the mineral consultation area and is adjacent to the historic clay pits to the east now known as Alderwood Ponds. The map within the Single Issue Soft Sand Review-Issues and Options Consultation (Reg 18) Page 5. Shows the estimated deposit of sand is situated under the road (A283) and into Wiston Park, and therefore within the South Downs National Park. See Draft Mineral Safeguarding Guidance, January 2017.

During the examination hearings of the Joint Minerals Local Plan in September 2017, the inspector suggested some modification and alteration to remove references to planning for reduced sand extraction and TO REMOVE THE PROPOSED HAM FARM ALLOCATION FROM POLICY M11

The watercourse immediately to the west of the proposed Ham Farm Site flows north across land that is the property of the Wiston Estate, who have put forward the Bunton Manor Farm Site. See Aggregates Sites and Resources map, appendix A:LAA map.

Minstead West. Although within the South Downs National Park, this is listed as a new site, it is adjacent to the now flooded Minstead Quarry.

It would seem a better alternative to the inclusion of Severals West and Severals East, as existing work extensions are preferable to new major developments in a rural environment.

Severals East. New site, within the South Downs National Park. Should be excluded on the grounds of proximity schools and dense domestic housing nearby. Aerial evidence shows earlier earthworks within the proposed site.

Severals West. New site, within the South Downs National Park, adjacent to Severals Road, should the development take place, the road becomes a ridgeway, and this proposed site is extremely questionable.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

The 12 non-shortlisted sites are missing from the West Sussex County Council web page in pdf form, of the Single Issue Soft Sand Review. Found in the in the December 2016 Outcomes Report. We are unable to make comment.

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

Please see above.

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

1.4 West Sussex Joint Mineral Local Plan has involved consideration of a substantial evidence base, including separate assessments of impacts on habitat, transport, landscape and flood risk.

No geological evidence has been presented.

2.2 Requires the presence of viable evidence. no evidence has been presented.

3.11 The Red Amber Green protocol takes only derived data and parcels it to a convenient format to show, in this case, the Council Officers need to fulfil a directive, and does not reflect the actual case.

As noted within the Site Selection Report, the village community of Wiston would be subject to an unreasonable level of major development and associated heavy vehicle traffic, if one of the sites were to be put forward. If both were to be included, the terms of the statutory duty of care for the parishioners, environment, landscape and character of the area would be breached.

Reticence of tenants to make representation.

The land, farms, dwellings, business properties and amenity building within the Parish of Wiston are predominantly owned by the Wiston Estate.

There are several tenants of affected properties who are declining to make representation due to their landlord being the proposer of one of the sites in question.

Transport and Access.

Transport Addendum (October 2016) This we feel has been overlooked, the provision of detailed or any forward planning for the carriage by road of 725,000 tonnes of sand from the proposed Ham Farm site is not addressed.

The Bunton Manor Farm proposed site would discharge heavy good vehicles directly onto the A283, with a design quantity of 1,000,000 tonnes, the road structure itself will not bear this traffic, the flow system relies on movement between the Shoreham Cloverleaf and the Washington roundabout, and this would be severely compromised in both instances.

The affect of the potential damage to the area and the associated traffic has not been addressed.

Request for Mineral Survey Results for Ham Farm.

Rejected by WSCC 28 June 2016. If the County have specific geological details of the Ham Farm site, and it has been withheld for the stated commercial reason,

under Exemption Regulation 12(5)(e)

We contest that there is no commercial interest but there is overwhelming academic interest. This is not a planning application. It is a site put forward for consideration for inclusion within a strategic mineral plan.

As far as we are aware the owner is free to consult any potential developer. Therefore any ground survey held by West Sussex should be available for the purpose of showing that any decision taken is taken based on confirmable fact.

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)?

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)?:

See above.

Part E - About You (The Equality Act 2010)

More questions About You

Age

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Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-03-15 19:25:01

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

First name:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Organisation or affiliation (where relevant):

Ashurst Parish Council

A2 Client Details if applicable

Title:

First name:

Last name:

Job title (where relevant):

Organisation or affiliation (where relevant):

A3 Contact Address Details

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

Other:

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

Demand scenario 1, the lowest estimate of demand, should be used.

If the highest demand scenario is planned for there is potential for an over allocation of sites, this could lead to over extraction and exportation of sand from West Sussex.

The calculation for the demand scenario includes sales figures for the past ten years. This does not necessarily reflect requirement within West Sussex; the Local Aggregate Assessment 2018, page 18, paragraph 2.1.26, identifies West Sussex as a net exporter of sand & gravel in 2014.

Given that reserves of soft sand in West Sussex are within specialist landscapes any plan to extract more than the minimum requirement will inevitably have a harmful effect on the environment

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

Previous requirement for the use of sand in housing may not reflect future need; current and likely future building methods make more use of timber framed construction with less reliance on bricks and mortar. This is a more sustainable approach that could be encouraged in planning policy, so reducing requirement for soft sand.

The Authority should take steps to ensure that all soft sand extracted from within West Sussex is used in West Sussex to ensure requirements can be met and avoid unnecessary movement by land or rail.

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

The SISSR page 10, paragraph 2.8, notes the LAA assumption that up to 91% of soft sand and gravel may be used in residential building. The Authority has control over building in West Sussex and is therefore in a position to both closely monitor requirements to better predict future demands and potentially exert control over this through promotion of sustainable building methods.

Part C - Issue 2

2a Do you consider that all 'reasonable alternatives' for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

Yes, the alternatives for supply of soft sand are reasonable.

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

Option C, working with other Mineral Planning Authorities in the South East, to consider potential for supply from areas less constrained by designated landscapes, is a sound plan that could make a significant contribution to meeting need.

Option D, supply from alternative sources including marine dredged material should be actively pursued as a source to meet future need. The LAA 2018, paragraph 2.1.32, references the potential for Marine Sand to provide 'viable soft sand as an alternative to land based quarrying'.

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

Option B, supply from within West Sussex, including SDNP, should only be taken forward if it can be delivered with minimal impact on the environment.

Option C should be taken forward as a strategy across the South East; this could provide appropriate local provision without impact on sensitive environments and from the perspective of transportation.

Option D should be taken forward. Marine sand is already landed at West Sussex wharves and there is acknowledged potential for development.

Option E, a combination of the above, clearly provides the most robust strategy to ensure supply.

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

The Sustainability Appraisal for Option A, supply from sites outside of the SDNP, identifies that there would be negative impacts, including landscape and residential amenity. This suggests it is not an appropriate option to take forward.

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

The method for selection of sites seems reasonable, however the RAG assessment is desk based with a risk that there is insufficient detail on specific sites to make a sound judgement, with potential for an unacceptable degree of subjectivity.

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Bunton Manor Farm, Ham Farm

Tick all the site boxes that apply (above) and provide comments below.:

Ham Farm:

In our view Ham Farm should be removed from the short list of sites for the following reasons:

- Ham Farm was recommended for removal from the draft minerals plan by WSCC Select Committee 16.11.2016
- Following the examination hearings of the JMLP, September 2017, the planning inspector instructed that Ham Farm be removed from Policy M11
- The transport and access RAG assessment does not reflect the likely significant impact on traffic flow and safety on this very busy and dangerous stretch of the A283
- Ham Farm would be a new site for which no evidence of viability has been presented
- The RAG score for amenity should be classified as red rather than red/amber as there would be significant harm, which could not be mitigated, to the residents and local businesses immediately adjacent to the site. This contravenes the second guiding principle of the review 'to protect the amenity of businesses, residents and visitors to West Sussex'.

Bunton Manor Farm:

In our view Bunton Manor Farm is not a suitable site and should be removed from the short list for the reasons below.:

- The RAG assessment containing a high proportion of Red and Amber ratings suggests that this site should have been removed at the short listing stage.
- The potential impact on transport and access has been significantly underestimated and should be red/amber.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

From the information available in Appendix 3 there appear to be valid reasons for not short listing these 12 sites.

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

No comment.

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

The sustainability appraisal relies too heavily on subjective judgement rather than objective measurement; this risks an uneven application of criteria.

The Sustainability Appraisal Report, page 36,37, Table 7.2 shows that for many sites the effect on the SA Objective is uncertain. This should mean that there is insufficient information to form an overall conclusion for some sites.

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)?

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)?:

The guiding principles are sound and it is essential they are adhered to.

Some of the shortlisted sites contravene the guiding principles as outlined in SISSR, page 18, paragraph 4.9.

Part E - About You (The Equality Act 2010)

More questions About You

Age

[REDACTED]

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[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

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[Redacted]

Good Morning Rupy,

Thank you for consulting Portsmouth Water on the Soft Sand Review of the West Sussex Joint Minerals Local Plan- Issues and Options Consultation (Reg.18). The nine proposed soft sand selection sites are outside PW operational area and the Source Protection Zone catchments for our drinking water sources. For that reason we have no further comments on this consultation.

Many thanks

Kind regards,

[Redacted]

[Redacted]
Catchment Management Officer
Portsmouth Water

[Redacted]



BEATING LEAKAGE BE OUR EYES AND EARS



0800 434 6104



www.portsmouthwater.co.uk



@portsmouthwater



RoSPA 2018 President's Award Winner

This e-mail is intended only for the addressee named above. As this e-mail may contain confidential or privileged information if you are not, or suspect that you are not, the named addressee or the person responsible for delivering the message to the named addressee, please telephone us immediately. An e-mail reply to this address may be subject to monitoring for operational reasons or lawful business practices. Please note that we cannot guarantee that this message or any attachment is virus free or has not been intercepted and amended. The views of the author may not necessarily reflect those of the Company.



The Midhurst Society

**Response to
The Manning Report
on Soft Sand Extraction
in the South Downs National Park**

There has been widespread condemnation of the proposal to re-examine sites in the SDNP which are deemed to have the potential for the industrial extraction of soft sand.

Several organisations, with more resources than The Midhurst Society, are looking at technical and legal aspects of the proposal. We, representing our members and followers, present a simple, non-technical argument as to why soft sand should not be extracted from within the SDNP.

We would suggest that the Inspector has failed to recognise the basic purpose of a National Park. The following quotes are taken from 8-Point Plan for England's National Parks March 2016 (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/509916/national-parks-8-point-plan-for-england-2016-to-2020.pdf)

“Covering nearly 10% of the country, containing some of our most memorable landscapes and almost 30% of our internationally important wildlife sites, National Parks are national treasures at the heart of our national identity.”

“This plan sets out our ambition to put National Parks at the heart of the way we think about the environment and how we manage it for future generations. We want as many young people as possible to learn about and experience the natural environment. National Parks are a great way in: inspiring environments that can be lifelong sources of wellbeing, identity, adventure and pride.”

“National Parks are the soul of Britain. They are the centre of our imagination. When people think of Britain, wherever they are, they imagine these landscapes. I'd like to make sure that everyone in Britain and more visitors from around the world have the unique experience of going to our National Parks.”

“Our National Parks are the jewels in the crown of our beautiful countryside and something to be very proud of. They are living, working landscapes that need careful stewardship, for the benefit and enjoyment of all.”

“Long before their formal designation, National Parks and AONBs were recognised as special places, providing rich inspiration for visitors through their natural beauty and the traditions and culture of rural life that contributed to this. Sustaining these historic, often fragile features of our landscapes is critical to ensuring that they remain some of the best places to visit in the country.”

The industrial-scale extraction and transport of soft sand and other minerals within a National Park for use outside a National Park is a gross violation of the Government's plan for the management of National Parks for the benefit of future generations. The extraction processes and the thousands of associated lorry journeys would result in intolerable levels of noise, dust and pollution. The existing condition of roads within the SDNP is poor, with authorities unable to keep pace with the regular appearance of deep pot-holes. Part of the cause is the transport of quarry waste and infill, in heavy lorries, on roads not designed for that purpose. Our small towns and villages already have pollution hotspots where monitoring would likely reveal that EU regulations are being breached, particularly on roads that habitually have stationery traffic. It would be cynical if not criminal to impose yet more pollution on residents of these areas.

We would also like to point out the inconsistency by which an authority within a National Park has to become an expert in resources available outside its area of jurisdiction. It should not be for the SDNPA to suggest alternative deposits of soft sand and other minerals; the role of the SDNPA should be limited to what is happening inside their National Park. It is for the construction industry and/or Central Government to identify alternative sources of supply, including imports from other countries and manufactured sand.

The Right Hon Secretary of State, Michael Gove, addressed the issue in his 25 year Environment Plan (HLWS392): “Respecting nature’s intrinsic value, and the value of all life, is critical to our mission. For this reason we safeguard cherished landscapes from economic exploitation, protect the welfare of sentient animals and strive to preserve endangered woodland and plant life, not to mention the greening of our urban environments.”

90% of the country **ISN'T** National Park. It would be ludicrous for a National Park to be exploited for the benefit of housing and construction in the other 90% of the country. In his report the Inspector is recommending a dereliction of the careful stewardship demanded by the Government's 8-Point Plan.

Sincerely



2 March 2019

<https://www.midhurstsociety.org.uk/>

<https://www.facebook.com/themidhurstsociety/>

Response ID ANON-2TKJ-41M4-1

Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-03-18 08:24:50

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

Mrs

First name:

Sophie

Last name:

Champion

Job title (where relevant):

Principal Policy Officer

Organisation or affiliation (where relevant):

Hampshire County Council

A2 Client Details if applicable

Title:

First name:

Last name:

Job title (where relevant):

Organisation or affiliation (where relevant):

A3 Contact Address Details

Same as details provided in A1

Name:

Sophie Champion

Address Line 1:

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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Local Authority

Other:

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

The delivery of housing is currently a high priority for Government, therefore we agree with Assumption 1 (applying a residential construction growth rate of 26.8%) being applied to calculate demand forecast scenarios. Assumption 2 is seen as of less importance for a number of reasons, building practices may change over the plan period, alternative materials may be utilised. Therefore Demand Forecast 3 appears most appropriate.

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

There is a need to account of other large scale infrastructure demands (not residential) that may be planned. It is accepted that this is difficult to put into practice as there are a lot of unknowns, but the LAA process should be used to inform forecasts.

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

No.

Part C - Issue 2

2a Do you consider that all 'reasonable alternatives' for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

Yes, no further suggestions to add.

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

It is accepted that there is a regional soft sand supply issue in the south east. Soft sand resources are contained within the National Parks, not just in West Sussex but other authorities in the south east including Hampshire. National Policy states that 'as far as practical' landbanks should be maintained by minerals from 'outside' National Parks and AONBs. However, given the constrained nature of soft sand resources in the south east, consideration needs to be made of the options overall and impacts that alternatives may have.

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

Option E - National Policy states 'so far as practical' mineral extraction should take place outside of the National Parks. However, given the supply issues in the south east there will be a need to consider all supply options to meet demand.

Hampshire is party to the Soft Sand Position Statement that has been prepared in collaboration with the other mineral planning authorities in the south east. This outlines the background information and overall situation regarding soft sand. We are continuing to engage with the south east mineral planning authorities on a joint Statement of Common Ground regarding soft sand to address the potential supply issues of the future.

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

No.

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Tick all the site boxes that apply (above) and provide comments below.:

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

Part E - About You (The Equality Act 2010)

More questions About You

Age

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[REDACTED]

[REDACTED]

Highways England ref: #6676

Consultation: Soft Sand Review of the West Sussex Joint Minerals Local Plan - Issues and Options Consultation (Reg.18)

Dear Planning Policy and Infrastructure Team,

Thank you for notifying Highways England of this consultation.

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. The strategic road network 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.

Having reviewed the information provided, we note that the shortlisted sites are not in close proximity to the strategic road network, and we do not have any further comments.

Should you have any queries regarding our response, please do not hesitate to contact us via our inbox: [REDACTED]

Regards,

Sent on behalf of Elizabeth Cleaver Assistant Spatial Planning Manager Area 4

[Redacted]

[Redacted]

Dear Stakeholder,

West Sussex County Council and the South Downs National Park Authority are working in partnership on a Soft Sand Review of the [West Sussex Joint Minerals Local Plan](#), as required by Policy M2 of the adopted Plan.

An Issues and Options consultation document has been prepared, alongside a number of other documents. These are being made available for comment in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, until 18 March 2019.

Attached to this email is a covering letter providing more information about the Soft Sand Review consultation.

Kind regards,

Planning Policy and Infrastructure Team.

This email and any attachments are confidential and intended solely for the persons addressed. If it has come to you in error please reply to advise us but you should not read it, copy it, show it to anyone else nor make any other use of its content. West Sussex County Council takes steps to ensure emails and attachments are virus-free but you should carry out your own checks before opening any attachment.

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[Redacted]

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[REDACTED]

[REDACTED]

Sent: 24 February 2019 20:58
To: PL MWDF
Subject: Sand Quarrying at Severals Midhurst

I am writing to strongly object to the use of Severals in Midhurst as a quarrying site. I am so upset to learn that this is a possibility as are my family and extended family who live in Midhurst also as well as our resident friends and neighbours.

It is an area of beauty and home to much wildlife. We take our children and dogs several times a week to play in this area and it is their favourite place to play and walk in Midhurst. We moved to Midhurst just over a year ago to raise our children in a healthier lifestyle. My youngest son suffers with respiratory issues and the healthy outdoors lifestyle does wonders for him. The threat of our immediate environment becoming polluted with the prospect of sand quarrying is a very upsetting and unsettling prospect to us.

I hope that it is not the case that this site is to be used in this way as it is so valuable to the community.

Signed,

[REDACTED]



Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-03-08 20:38:29

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Job title (where relevant):

Organisation or affiliation (where relevant):

A2 Client Details if applicable

Title:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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Other:
Business Chamber

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

In our opinion the scenario which has least impact on the lives of our members and the residents of Steyning and our District would be the most suitable to us. Steyning is a town surrounded by natural beauty. Any type of quarry in close proximity to our town and district will effect people's way of life and livelihoods. People working and living in the area would suggest that increasing pollution (Air, noise and light) and traffic will impact on them. All the scenarios suggests have pros and cons.

A scenario with least impact on the environment, health and well being of residents and business owners and traffic would be the one to choose. It seems sensible to use the sites which are already in use in preference to digging up virgin plots.

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

In an ever changing world we should be seeking building materials that don't have an impact on our environment in any way. These should be sustainable, have low environmental impact and be replaceable. The thought of digging a huge hole in the ground in an area of such history and wealth of natural beauty and then replacing it with waste materials is abhorrent.

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Yes, we should be using less non sustainable building materials. Developers should be encouraged to use more advanced building methods.

Sand is available from other sources as discussed in Section 3

<https://democracy.eastsussex.gov.uk/documents/s15200/LMTE%20180717%20Report%20-%20SoCG%20Soft%20Sand.pdf>

Part C - Issue 2

2a Do you consider that all reasonable alternatives for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

No, we feel that there are lots of alternatives which are yet to be explored. Digging a quarry in an area of such beauty should not be the last resort.

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

All options are based on assumptions. If the need is calculated at 2.36 million tonnes of sand to build 26.8% more residential dwellings than now, and that 91% of the sand or gravel will in the construction, its all surmised on calculations that possibly have no grounding.

Building residential dwellings from bricks and sand is so archaic.

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

In an ideal world none of the options would be used. The local councils and government need to be looking for different ways to build. A shortfall of 2.36 million is not easily achievable if sourced within West Sussex without sacrificing our local landscape. Many of our members rely heavily on tourists who visit because of our proximity to the South Downs, as Steyning is one of the Gateway towns. If quarries were dug adjacent to the South downs, it could be hugely detrimental to our towns economy.

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

I can't comment to any great depth. But, we are aware that a more in depth appraisal should be undertaken before the Plan can proceed. The impact on the local area, and community is to great not to do so.

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

We believe that without in depth knowledge of a site you cannot propose a site as 'acceptable in principle'. Many site visits are necessary. One must take the impact that using any of the sites listed in the plan will have on the surrounding inhabitants, businesses and visitors, whether this is few or many. The use of the traffic light system (RAG) is open to misinterpretation if this is not done.

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Ham Farm

Tick all the site boxes that apply (above) and provide comments below.:

If the Ham Farm site were chosen this would have direct impact on local businesses and residents in Steyning and its district. We believe that this is not acceptable.

Steyning and District Business Chamber represents the interests of over 65 business members. Our principle objective is to promote, protect and develop the interests of the business community of Steyning and the district area. The prosperity of our businesses, employees, their families and the area of outstanding natural beauty in which we both work and live in is paramount to their success and the community as a whole.

Steyning is a thriving market town, despite economic downturns over the past few years, its a destination shopping and eating hub, with a far reaching reputation for its outstanding community and business events, i.e. the Steyning Festival, Steyning Country Fair, Late Night Shopping and The Big Church Day out to name just a few.

The key to protect and continue the success of our local business community and events is access and being protected from pollution. Access by visitors, employees, families, not only to the town, but to the 'outstanding' (OFSTED) Steyning Grammar School, access by diplomats and associates to Wiston House, and so the list goes on. Protecting our members, families, guests and visitors from all the environmental impacts which are associated with mineral extraction concerns our Chamber too.

Increasing lorry and traffic movements on an already over used A283 route has to increase risk of danger. Traffic jams, accidents, noise, light and air pollution we feel will have a detrimental affect on our district. Heavy traffic is already accelerating the disintegration of the road surface, more traffic will exacerbate this.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

No comment

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

No Comment

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

The health and economic impact on those living locally to the site has not been given enough consideration.

The impact in terms of protecting West Sussex's environment whilst providing minerals needed by society is not easily balanced.

Minerals can only be worked where they are found, and due to the close correlation between the location of mineral resources and areas of high quality and designated landscapes, which are considered to be sensitive environments, the need for mineral working should be balanced against the impact on protected landscapes. We feel this balance cannot be achieved.

Potential for damage to the historic environment is high. Several historic buildings and areas of historical interest could be impacted on if extraction a Ham Farm Site is allowed.

The Ham Farm site can clearly be seen from the Downs surrounding Steyning and District, this is not 'protecting recreational assets in our countryside'.

The water table at the Ham Farm site is high, disturbing the lie of the land could have impact on local businesses, road users and land owners.

We feel that minimising road traffic would benefit the ecosystem, an increase of traffic that comes with any venture like this would have a detrimental impact on our members and their visitors/clients/customers.

Avoiding all of these issues has to be better than mitigating against them.

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)?

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)?:

The Steyning and District Business Chamber feel that the impact this site would have on the local businesses and residents has been undervalued, and the impacts on local tourism and commerce misunderstood. Steyning is one of thee Gateway towns to the SDNP and its main attractions include easy access to SNDP and the enjoyment of that environment in a stress free, low impact peaceful manner. In this crowded part of the UK many visitors relish easy access to the South Downs which offer openness, naturalness, peacefulness and distant views. The proposal of extracting sand in our district will result in visibility of disturbance to the natural landscape, noise and light pollution, all detractors to peace and tranquility. Visitors are also attracted by views of the Downs and the beauty of the surrounding countryside as the approach from the A283. This highly visible and busy site with structures, noise, dirt, and continuous vehicles leaving and coming to the site will have serious impact on the setting of our picturesque market town. For these reasons we take the view that there will be an adverse impact on tourism and visitors which are essential for the local economy.

Part E - About You (The Equality Act 2010)

More questions About You

Age

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Planning Services
West Sussex County Council
County Hall
Chichester
PO19 1RH

6th March 2019

Your ref: SSR

Dear Sir or Madam

Soft Sands Review – consultation

I am writing with reference to the current Soft Sands Review and in particular the proposed quarry development at the Severals East site on the edge of Midhurst. I attach a document I have prepared highlighting certain issues with this site, and the assessment already carried out by the County Council.

I, along with many others, strongly object to this proposed development. However, recognising that there is need to obtain sand from somewhere, I feel that objectors such as myself, should present carefully thought out and detailed back up to their objections rather than just saying “not in my backyard”. I hope that you will find the information that I present in the attached document gives such back up, and I hope that I can make a positive contribution to the debate.

Yours faithfully

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A black rectangular redaction box covering contact information.

A black rectangular redaction box covering contact information.

OBSERVATIONS ON THE PROPOSED QUARRY DEVELOPMENT AT SEVERALS EAST

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Stephen Prior BSc(Hons), CEng, MIET
Managing Partner
Prinia Consulting LLP

March 2019

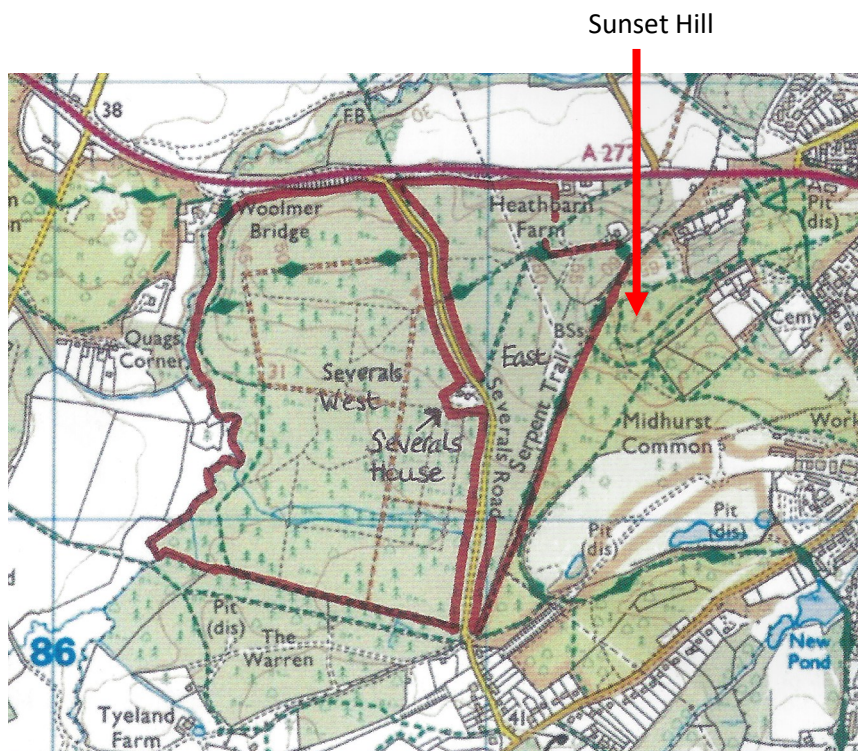
Observations on the proposed quarry development at Severals East

1. Introduction

The purpose of this paper is to give some very specific objections to the proposed sand quarry development at Severals East, with these objections backed up by photographs, maps and data. Whilst I believe that the quarry development proposed for the Severals as a whole is completely inappropriate and should not be allowed to proceed I am here concentrating on Severals East for the reasons given below and also this site's very close proximity to the Midhurst town boundary. There are, of course the broad issues of loss of countryside amenities as well as noise, traffic and light pollution, the very issues Lord Cowdray complained about when fracking was threatened near his home in Fernhurst. However I believe that it would be a useful addition to the debate, to document here why the specific development proposed for Severals East would be so detrimental for the local environment and community.

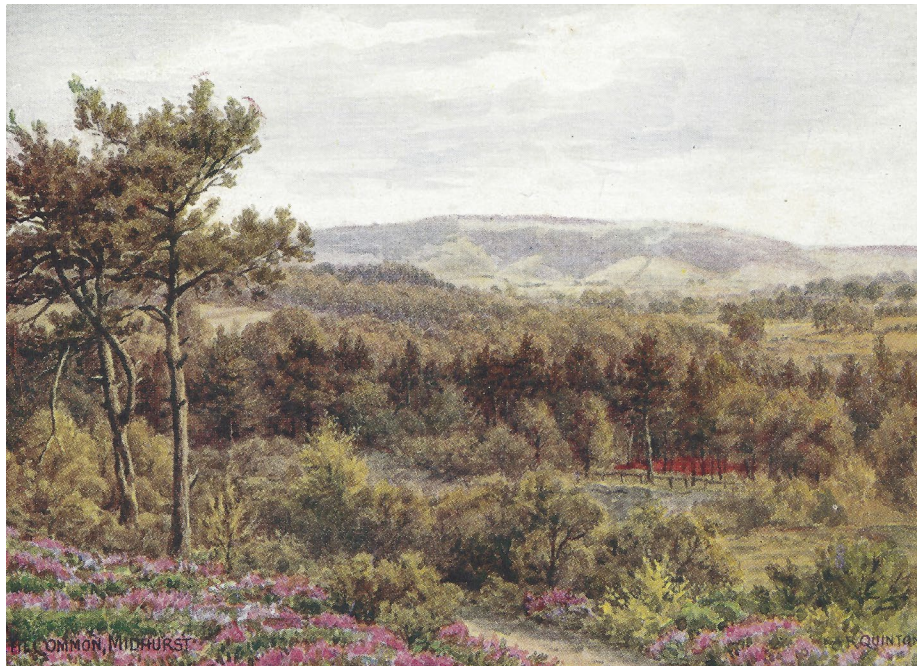
2. Midhurst Common – visual impact

Midhurst is very lucky to have, within walking distance of the centre of the town, an exceptional area of outstanding natural beauty on Midhurst Common. The highest point of Midhurst Common, Sunset Hill, is around 100 feet higher than the lower parts of the common, not only affording great views of the common itself but the South Downs beyond.



The special quality of the views that can be seen from Sunset Hill has been recognised since at least the 19th century. In the early 1900s this very view was the subject of a painting by the noted water colourist Alfred Robert Quinton (1853 – 1934), which has since graced thousands of post cards over many years.

Observations on the proposed quarry development at Severals East



Watercolour by Alfred Quinton, circa 1900



The same view today

Observations on the proposed quarry development at Severals East

Trees of Severals East

Sunset Hill



Sunset Hill

As things stand today, the view is very little changed. A short walk from town, it attracts many people, not only to admire the view but the special nature of the site has also made a place where some people have chosen to commemorate their loved ones. Friends and family of the late Corporal David O'Connor RM, killed on active duty in Afghanistan in 2012, have planted a memorial tree and, nearby, the old and dilapidated bench has recently been replaced by a memorial bench.

Observations on the proposed quarry development at Sevels East



Corporal O'Connor's recently planted memorial tree.



Recently constructed memorial bench.

Observations on the proposed quarry development at Severals East

The view from Sunset Hill makes it a special place, but no consideration appears to have been given to this when selecting the proposed site for sand quarrying. Not only is the nearest point of the boundary of the proposed Severals East quarry only a few tens of metres away from the Sunset Hill, it is some 15m below the viewing point at the top. Within a short distance, parts of the quarry site are nearly 40m lower than the summit, meaning that any quarry will not be able to be landscaped out of sight, it will be fully overlooked from this local beauty spot. The County Council assessment report on the site makes no reference to it being overlooked when discussing the visual impact it would have on the locality.



The same view as on page 2 marking the boundary and trees of the Severals East quarry site



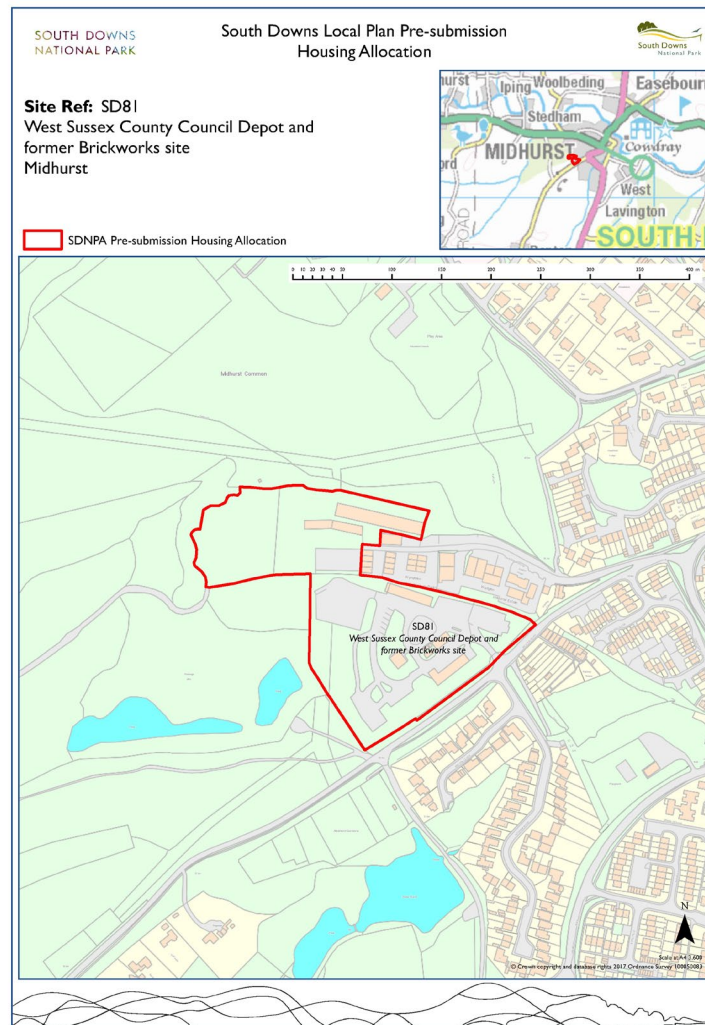
Quarrying equipment at the Minsted site as seen from the ground level footpath next to the site.

Observations on the proposed quarry development at Severals East

3. Other planned developments

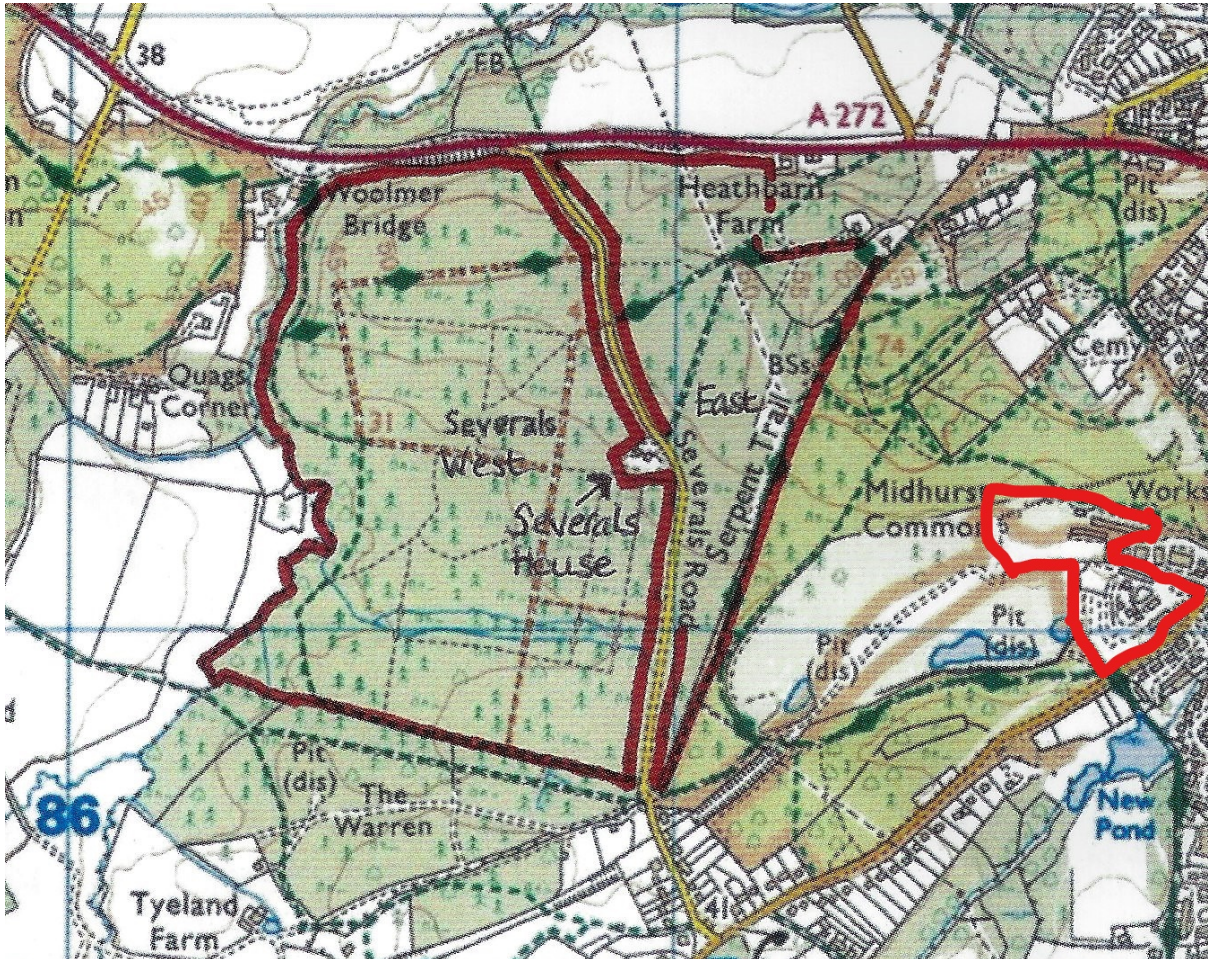
The Severals East quarry is not the only proposed development that would seriously encroach on Midhurst Common. In the draft South Downs National Park Plan, one of the proposed sites for housing development is the site of the former Midhurst Brickworks and the Bepton Road Council depot. Although the north and west part of this site, which cut into Midhurst Common, are derelict industrial land, they have a good covering of vegetation and are a currently an undisturbed haven for wildlife adjoining the common, something which will be lost if housing development is carried out on the site.

Forgetting the considerations of the local flora and fauna and the further reduction of Midhurst Common, this housing development should be considered in the context of a quarry development at Severals East. When superimposed on the map of the East Severals quarry (see next page) it would appear that the quarry and the new housing development would be less than 400m apart at their closest point. Surely, at the same time planning a large housing development and a quarry development in such close proximity are incompatible with each other?



Taken from the draft South Downs National Park plan

Observations on the proposed quarry development at Severals East



Midhurst Brickworks housing development (edged in bright red) in comparison to the Severals quarries

Observations on the proposed quarry development at Severals East

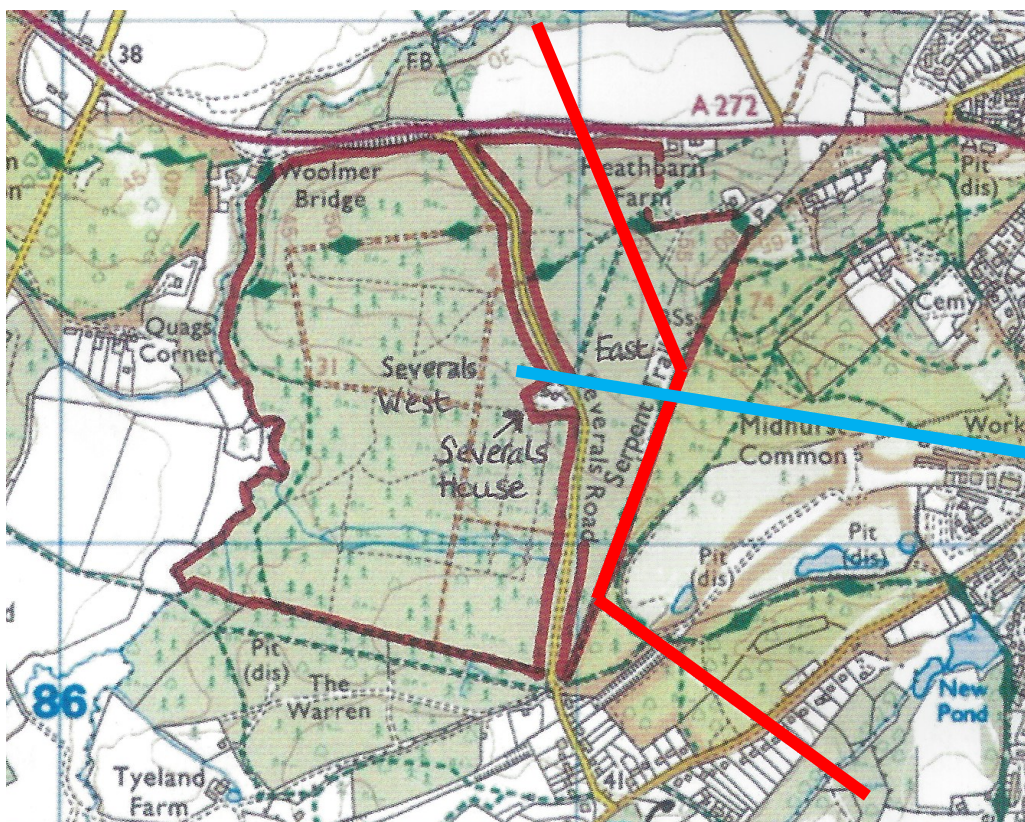
4. Existing power lines

The **West Sussex Joint Minerals Local Plan Soft Sand Sites Selection Report** published in January 2019 by the County Council reviews all the potential quarry sites in the county. Each site is reviewed using 12 categories which are rated Red, Amber or Green. On page 110 of the report it says the following relating to the Severals East site:

Services and utilities	To be identified using evidence provided by utility/service providers.	GREEN There are no services or utilities near to, or within the site.
------------------------	--	--

This is factually incorrect.

The Severals East site is crossed by two power lines, one of 33 kilo Volts (kV) and one of 11kV. The fact these very obvious features of the site were missed calls into question the quality any review that the Council has carried out on the site. This was one of only 3 Greens awarded to the site out of 12 categories. With the correct information this would become another Amber or Red. The map below shows how these power lines divide the Severals East site into three parts.



Red 33kV power line
Blue 11kV power line

Observations on the proposed quarry development at Severals East



33kV power line



11kV power line

What will happen to these power lines if the Severals East site is developed into a quarry?

As can be seen from the above photographs, the power lines, and the 33kV line in particular require a significant clearance around them. Clearly sand could not be dug out from around supporting poles, it would seem highly unlikely that heavy earth moving equipment would be allowed to operate under these power lines, meaning that considerable areas of the site under the lines could not be developed, thereby reducing the viability of the site, and there might be the necessity for separate access points for different parts of the single site.

If the solution is to move the power lines, where would they go and what effect would that have on the environment wherever it is they would be moved to? In their current situation they are at least largely screened by the trees and indeed, they actually benefit the walkers who visit the site by opening out clear paths through the woods. What is most concerning is that such obvious features of the landscape have been missed in the site assessment.

Observations on the proposed quarry development at Severals East

5. The Serpent Trail

From the West Sussex County Council website

Waymarked by Serpent Trail discs, the route showcases the work of the Sussex Wealden Greensand Heaths Project and highlights the outstanding landscape of the Greensand hills. The trail 'snakes' by Liphook, Milland, Fernhurst, Petworth, Fittleworth, Duncton, Heyshott, Midhurst, Stedham and Nyewood to finally reach the serpent's 'tail' at Petersfield.

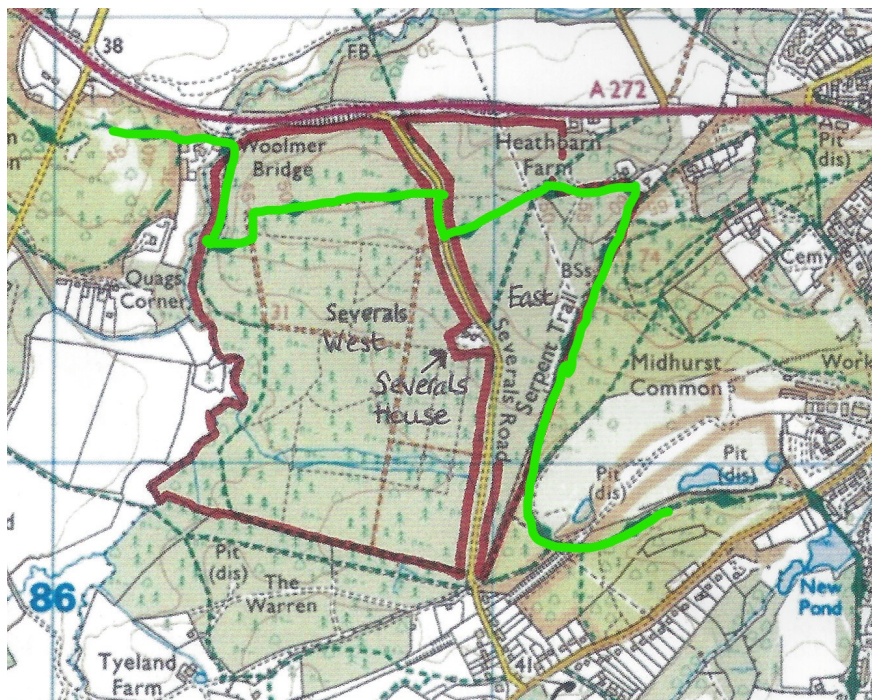
<https://www.westsussex.gov.uk/leisure-recreation-and-community/walking-horse-riding-and-cycling/serpent-trail/>

From the Long Distance Walkers' Association website

The Serpent Trail is a 64-mile path which winds its way through the rare heathlands of the South Downs National Park. The walk will take you through beautiful and internationally rare lowland heath habitat, 80 per cent of which has been lost since the early 1800s, passing through purple heather, green woods and golden valleys of the Sussex greensand hills. The Trail and the corridor of heathland habitat created along part of it also links up isolated heathland sites to support species such as the green tiger beetle and Dartford warbler.

https://www.ldwa.org.uk/ldp/members/show_path.php?path_name=Serpent+Trail

The Serpent Trail (marked in green below) runs through both the Severals West and Severals East sites and forms the eastern boundary of the Severals East site



Clearly the Serpent Trail would be completely destroyed where it runs across the proposed quarry sites and would be seriously degraded where it runs along the boundary.

Observations on the proposed quarry development at Severals East



This view shows that even where the Trail is outside the quarry site, its close proximity to it. The Severals East site starts immediately to the right of the path. Presumably some kind of fence would have to be erected immediately beside the path and the trees would be replaced by the quarry.



The Serpent Trail is well named. This slow worm had to be removed from the middle of the Trail for its own safety, from where it had been basking in the sun. The boundary of the Severals East site is immediately to the right of the heather and the dark green vegetation at the top right of the picture is on the site.

Soft Sand Review – Jan 2019

Response to Questions – Raymond Brown Quarry Products Ltd

Question 1

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

Scenario 3 (10 year average sales + additional demand for housing), subject to our answer to Question 1b below.

Paragraph 207 of the National Planning Policy Framework (NPPF) requires Mineral Planning Authorities to plan for a steady and adequate supply of aggregates. This is achieved by forecasting future demand, based on a rolling average of 10 years' sales data and relevant local information.

National Planning Practice Guidance (NPPG) states that a Local Aggregate Assessment (LAA) should include an assessment of the balance between demand and supply, and the economic and environmental opportunities that might influence the situation.

Paragraph 16 of the NPPF requires that Plans should be prepared positively. Paragraph 20 and 22 state that strategic policies within Plans should make provision for minerals and that strategic policies should anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.

The Soft Sand Review Consultation identifies the primary end use of soft sand as that of mortar production, therefore it is recognised that there is an intrinsic link between construction of new dwellings and demand for soft sand. Scenario 3 considers future demand for soft sand by taking account of the anticipated level of housing construction through the Plan period. This approach is considered to positively plan for an adequate supply of aggregates over the plan period in accordance with the requirements of national policy and guidance set out above.

Scenario 1 fails to accord with national planning policy or guidance as it takes no account of relevant local information or economic opportunities in forecasting aggregate demand over the plan period. It is therefore considered that Scenario 1 should be discounted.

Scenario 2 is not considered to accurately forecast the demand for soft sand as Assumption 2 (up to 91% of sand and gravel may be used in the construction of residential dwellings) is incorrectly extrapolated from Table 1 CLG/BGS (June 2013) Mineral Planning Factsheet: Construction Aggregates.

Principal uses	Sand & gravel*
Concrete aggregate	36 694
Screened, graded aggregates, including surface dressings	4 609
Roadstone and gravel, coated	504
Roadstone uncoated	–
Building and asphaltting sand	7 549
Railway ballast	–
Armourstone/gabion	–
Constructional fill and other constructional uses	5 659
Total sales	55 015

Table 1 represents all sand & gravel types, including sharp sand, gravel, soft sand and marine dredged substitutes. As identified above, soft sand is predominantly used for mortar production and plaster associated with the construction of dwellings. Sharp sand, gravel and marine dredged aggregates are typically unsuitable for this use by nature of their properties and therefore have alternative end uses. The Soft Sand Review concerns the demand for and use of soft sand only, of which up to 100% may be used in the construction of residential dwellings. It is therefore considered that the assumption that up to 91% of soft sand is used in the construction of residential dwellings is incorrect and that Assumption 2 should be discounted and Scenario 3 taken forward.

END

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

Yes.

As identified within the West Sussex Local Aggregate Assessment 2018, West Sussex is a net-exporter of land-won sand and gravel, with a deficit of up to 220,600 tonnes per annum. Given indigenous arisings of land-won sharp sand and gravel averaging approximately 50,000 tonnes per annum, the Aggregate Minerals Survey for England and Wales (2014) and LAA 2018 data indicates that the vast majority of the material exported from West Sussex is soft sand.

Demand forecast Assumption 1 considers demand associated with construction rates in West Sussex. The growth factor applied is 26.8% growth in annual housing completions through the plan period, this can be found in Table B1 of Appendix B to the LAA (2018).

Table B1: Planned housing growth in West Sussex and Neighbouring Areas.

	Average completions per annum (2008/09 – 2017/18)	Average planned housing per annum (2018 – 2033) ¹⁷	Percentage Change
Brighton & Hove	485 ¹⁸	784	61.8%
East Sussex	1,308 ¹⁹	2,069	58.2%
Hampshire	5,486 ²⁰	7,008	27.8%
Surrey	2,646 ²¹	3,118	17.8%
West Sussex	3,245	4,114	26.8%
Average for West Sussex, East Sussex, Brighton & Hove, Surrey and Hampshire	13,169	17,093	29.8%

Table B1 also considers planned housing completions in neighbouring authorities, which range from growth of 17.8% to 61.8%. The average growth figure across these authorities is 29.8%. Paragraph 64 of the National Planning Guidance states that in preparing Local Aggregate Assessments, Mineral Planning Authorities should include levels of planned construction and housebuilding in their area AND (my emphasis) throughout the country.

West Sussex should consequently consider its role sub-regionally in the supply of these resources to the market and neighbouring Mineral Planning Authorities. In accordance with paragraph 24 of the NPPF Local Planning Authorities are under a duty to cooperate with each other, on strategic matters that cross administrative boundaries. It is considered that in order to positively plan for soft sand demand throughout the plan period, the sub-regional average annual housing completion growth factor of 29.8% should be applied within Assumption 1.

END

c) Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information / evidence to support your view.

Yes.

Based on our responses to Question 1b above, we consider that an alternative annual housing completion growth factor of 29.8% should be applied to the demand forecast. This results in a total annual soft sand requirement of 381,271 tonnes, an increase of 8,812 tonnes per annum over Scenario 3. This equates to a total requirement over the Plan period (2018 – 2033) of 5,719,065 tonnes (an increase of 132,178 tonnes). This results in a shortfall of 2,974,065 tonnes (2.97mt) of soft sand over the Plan period.

END

Question 2

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

All reasonable alternatives have been considered and listed within Option A to E to ensure soft sand supply have been identified and sourced in a justified manner.

END

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?

Option A (Supply from sites within West Sussex, but outside of the National Park)

Paragraph 2.0.4 of the LAA 2018 states that soft sand in West Sussex is won from the Sandgate Formation and the Folkestone Formation (also known as the Folkestone Beds). Paragraph 2.0.8 states that much of the soft sand outside the SDNP in West Sussex has been worked or is currently being worked and that the majority of the remaining land-won soft sand resources lie within the SDNP.

The two sites that have been proposed that lie outside of the South Downs National Park, Buncton Manor and Ham Farm, total an estimated 1,750,000 tonnes of soft sand and therefore do not contain sufficient reserves to satisfy the requirement of 2.97mt over the plan period. Only sourcing land-won soft sand from outside of the National Park is, therefore, not a viable option to meet forecast demand.

In addition to this, the potential landscape and amenity impact of these sites, particularly Buncton Manor (scoring Red on the landscape category of the RAG site assessment) could cause a significant adverse visual impact to the National Park. From the West Sussex review, it has been identified that there are no viable potential extension options for the currently active soft sand sites that lie outside of the SDNP boundary.

Option B (Supply from sites within West Sussex, including within the National Park)

Paragraph 203 of the NPPF identifies that minerals are a finite natural resource that can only be worked where they are found. Paragraph 1.3 of the Soft Sand Review states that in West Sussex, soft sand is mainly located within the South Downs National Park.

The industry body the Mineral Products Association, in its Press Release of May 2018, stated that 'over 200 active quarry operations are currently located within areas of landscape designation, with a further 98 sites located within 1km of their designated boundaries – collectively representing over 23% of all the active quarry sites in England. Mineral extraction is a vital and valued activity in all rural settings but particularly within and around National Parks and AONBs where economic activity tends to be comparatively constrained. The minerals industry is a significant employer and contributes to the wider local economy by supporting its own supply chain'.

The shortlisted sites located within the National Park contain sufficient reserves to meet demand throughout the Plan period. The supply of land-won soft sand from within the South Downs National Park is therefore considered to be a practical and viable solution to meet demand.

Furthermore paragraph 2.0.10 of the LAA 2018 states that the variable grain size and low clay content of the soft sand from the Folkestone Formation means that little or no processing is required to produce high quality building sands for plaster and mortar. The resource will therefore require limited processing to produce a suitable product, reducing energy requirements and environmental and amenity impacts, increasing the overarching sustainability of extraction operations.

Option C (Supply from areas outside of West Sussex)

Paragraph 207 of the NPPF states that Mineral Planning Authorities should make provision for the land-won elements of their Local Aggregate Assessment in their mineral plans. Paragraph 60 of Planning Practice Guidance requires that mineral planning authorities which have adequate resources of aggregates, make an appropriate contribution to national as well as local supply.

National policy and guidance therefore establish the requirement for mineral planning authorities to positively plan for land-won reserves within their area, sufficient to satisfy local demand and additionally contribute to national supply.

As identified earlier, West Sussex is a net-exporter of land-won sand and gravel and therefore the authority represents a regionally important source of supply. Failure to plan for demand may result in an inadequate supply of soft sand to the market, adversely affecting housing delivery and economic growth.

A reliance only on cross-boundary imports of soft sand would undermine the environmental principle of self-sufficiency and discord with national policy and guidance on plan preparation and mineral supply. The importation of significant quantities of soft sand to the county would result in an increase in vehicle miles, associated greenhouse gas emissions and impacts on air quality and human health across the region.

Option D (Supply from alternative sources including marine dredged material)

The British Marine Aggregate Producers Association (BMAPA) publication 'Marine sands in mortars and screeds', states that the main difference between the majority of land-based sands and marine sands are the presence of chloride and shell, and that there is occasionally resistance by Specifiers and Purchasers to restrict the use of 'sea dredged' sands due to their

potential to include levels of chlorides. Paragraph 2.2.1 of the LAA 2018 states that marine-won sand and gravel landed in the South East of England is primarily used as a replacement for sharp sand and gravel. It is considered that this reflects the properties of the resource available and specification required by users.

Paragraph 2.2.8 of the LAA 2018 states that there are some areas of 'fine sand' within the South marine plan onshore and offshore areas, but that the currently licensed areas are in areas of coarse sand and coarse aggregate. The British Geological Survey 'Mineral Resources of the English Channel and Thames Estuary' (2013) report states that the potential marine sand and gravel resources identified take no account of planning constraints that may limit their working and that the economic potential of individual sites can only be proved by a detailed evaluation programme.

Paragraph 2.1.32 of the LAA 2018 states that during the three-year period 2015-2017, an annual average of 21,846 tonnes of marine-won soft sand was sold from wharves in West Sussex. Taking into account existing permitted reserves, seeking to supply soft-sand from this source at the present rate of arisings would leave a significant shortfall of 176,425 tonnes per annum, equivalent to 2.65mt over the Plan period.

Paragraph 3.20 of the Soft Sand Review states that there are currently no known viable equivalents to land-won building sand in the South East. Therefore, only sourcing soft sand from marine or alternative sources is not a viable option to meet forecast demand over the Plan period.

Option E (A combination of the above options)

As set out above, Options A, C and D are not considered to be viable for the supply of sufficient or appropriate soft sand to meet demand throughout the plan period. Option E, a combination of all sources, is therefore not considered to be viable or deliverable.

END

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

Option B (Supply from sites within West Sussex, including within the National Park).

Based on our responses to question 2b) it is considered that Option B represents the only viable and deliverable source of suitable soft sand able to adequately supply demand throughout the Plan period.

Option B is considered to be in accordance with national planning policy, guidance and environmental principles.

END

Question 3

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

No.

END

Question 4

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

It has been confirmed by the Planning Inspector that the site selection methodology and its application, including the traffic light system is robust and sound. He also concluded that the methodology and criteria is justified, effective and consistent with national policy.

There are some additional points for consideration within the site selection methodology which are as follows:

Paragraph 16 of the NPPF states that Plans should be prepared positively, in a way that is aspirational but deliverable. In addition, paragraph 35 of the NPPF states that Plans are considered to be sound if they are deliverable over the plan period. The deliverability of a site is therefore considered to be critical to the viability and effectiveness of the Plan throughout its period. This is a key consideration to ensure that an adequate supply of aggregates is maintained throughout the plan period. It is considered that the shortlisted sites should be subject to a rigorous assessment of deliverability to ensure that the appropriate landowner consents are in place to support the proposal and that there are no fundamental legal or title issues such as restrictive covenant that would significantly delay or prevent development of the land. Such assessment should include but not be limited to inspection of Title/Land Registry by a suitably qualified person and be clearly set out at Site Selection stage.

Paragraph 207 of the NPPF states that minerals planning authorities should ensure that large land banks bound up in very few sites do not stifle competition. It is therefore important to ensure that dominance is not given to one specific mineral operator and that competition exists within the County.

Para 174 of the NPPF states “promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species and identify and pursue opportunities for securing measurable net gains for biodiversity”. The long term restoration benefits, environmental enhancements and amenity improvements are key considerations within the merits of each proposed mineral site. Therefore, it is essential that long term benefits must be assessed within the site selection methodology.

END

Question 5

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

In line with Option B (Supply from sites within West Sussex, including within the National Park), Severals West and Severals East provide a deliverable and significant mineral reserve for the County. As shown in the Proposed Development Plan, both Severals East and Severals West have been assessed in terms of potential quarry design and have been combined as one site known as ‘Severals’. The amalgamation of the sites provides one quarry that is operationally deliverable, financially viable and able to deliver a restoration which will deliver biodiversity net gain. A number of constraints have been identified (shown in the Constraints Plan) and taken into account within the ‘Severals’ site, these being:

- Local groundwater levels – site to be worked above water table
- Surface water tributaries – Site to be worked to the north of these water flows
- Severals Bog, Quags Corner and Severals Stream – sufficient mitigation standoff in place
- Ancient woodland soils – minimal disturbance to PAWS soils

- Public Rights of Way – Formal / Permissive paths – Serpent Trail to remain in-situ and paths to be diverted to the site boundary to allow continued public use. Any diverted Public Rights of Way can be reinstated on original routes upon restoration.
- Residential properties – 100m standoff from Severals House, Heathbarn Farm and Woolmers Bridge.
- Visual Impact – Standoff around the site boundary to ensure sufficient site screening by use of existing woodland and construction of soil screening bunds.
- Noise impact – Standoff and screening bunds provide adequate noise mitigation.

Mineral Need

The reserve estimates for Severals East and West totaling approximately 1.7mt which provide a significant yield to contribute the County's 2.97mt forecast over the plan period. West Sussex has confirmed the need for the mineral in accordance with Para 172 of the NPPF and the project proposal at Severals demonstrates it can deliver a range of public benefits and improved amenity and ecological value.

Deliverability

Both sites have the appropriate land consents in place to demonstrate the support of the Landowner, Cowdray Estate to work in partnership with the Mineral operator, Raymond Brown Quarry Products Ltd. There are no title issues or restrictions to prevent or hinder the mineral development. The mineral operator confirms that extraction would commence immediately following the grant of planning permission to ensure a consistent supply of aggregate over the plan period.

Planning Considerations

The following planning considerations have been detailed to provide the sustainable aspects of the project:

Restoration

Working of the site would take place in a phased manner with accompanying progressive restoration. Restoration of the site would entail the importation of a limited amount of inert material in order to re-grade the profile of the land. A mix of deciduous broadleaf tree species will replace the existing conifer plantation to enhance the local biodiversity over the long term. The long term vision for the site is in accordance with Section 3.29 - Restoration will ensure that "an appropriate long term site restoration and after use vision will be established".

The proposed restoration will incorporate the mosaic and diversity of the woodland / heathland habitat which links Midhurst Common to the east to Steadham Common to the west. Biodiversity and landscape improvements will not be limited to the extraction area, it is proposed that there will be opportunities to re-plant broadleaved woodland on plantation outside of the extraction boundary and in coordination with existing forestry lifecycles.

The site provides significant benefits for social and recreational value of the wider area. The proposed restoration will enhance the existing environmental value of the site by creation of improved habitats. The benefits of Severals restoration will satisfy Para 170 of the NPPF "planning system should contribute to and enhance the natural and local environmental by protecting and enhancing value landscapes".

Soil Management

The Severals sites presently comprises a large area of operational, non-native conifer plantation forest. It must be noted that areas within the sites are part of a commercial operation which are due to be felled within the next 7 years felling cycle. In order to protect the Plantation on

Ancient Woodland Site (PAWS) soils, the quarry proposal has been focused within the central part of the site. The northern PAWS soils would therefore be left in-situ and thus, undisturbed. The central PAWS soils would be directly placed for quarry restoration to avoid soil damage during handling and storage. This soil strategy has been successfully implemented at Raymond Brown's Brickworth Quarry (soft sand quarry on PAWS) in Wiltshire that is currently achieving 86% direct placement of PAWS soils.

Landscape

In order to minimize landscape and visual impacts, large buffer zones and standoffs will be retained around the site perimeter to restrict views of extraction operations and protect long distance views. Soil screening bunds will also be constructed around the quarry boundary to mitigate any local visual impact. The screening bunds will also provide noise mitigation for the local residential properties. The landscape mitigation will retain the boundary woodland and forestry which forms an inter-visibility link to the surrounding landscape whilst protecting the value of the South Down National Park and longer distance views.

Public Rights of Way

The network of Public Rights of Way (Footpath 3617, 3618, 3619 and 921) will be temporarily diverted to the boundary of the site so they can continue to be used during the quarry timescales and then reinstated. The Serpent Trail will remain in-situ and continue to be used throughout the lifetime of the quarry. The extant permissive paths that run through the woodland (with agreement from Cowdray Estate) will also be formally adopted to provide an improved footpath network. In addition to this, bridleways will be created to improve the connectivity between Midhurst Common and Quags Corner.

Hydrology / Hydrogeology

Within the JMLP Report, Severals East and West scored Red/Amber on the RAG assessment scoring as "the site is near vulnerable water bodies (Severals Bog SNCI) which could be negatively impacted in the absence of mitigation. It was also suggested that a hydrological risk assessment would be required prior to allocation."

The 'Severals' site design has incorporated the hydrological and hydrogeological conditions and been designed to appropriately mitigate these potential impacts. The features of the quarry design include:

- Quarry working to remain above the water table to avoid impact to the groundwater levels
- The quarry has been limited to the north of the springs/tributaries to the south of the site to avoid any impact to surface water runoff.
- Adequate standoffs to Severals Bog, Quags Corner and Severals Stream to avoid any adverse hydrological impacts.

In addition to this quarry design, a Phase 1 hydro assessment has been undertaken by our hydrological consultant. The range of mitigation measures have been assessed and the report summarises "there are no over-riding hydrological or hydrogeological related reasons why the proposal site (Severals East and West) should not be promoted to the next stage in the JMLP allocation process".

In the event that the Severals sites are successful in the selection process, a further more detailed hydro risk assessment will be completed to mitigate any potential adverse hydro impacts. The restoration plan also incorporates the existing surface water features to the south

of the proposed quarry to manage runoff rates and improve water attenuation of the area. The wet/humid heath complements the adjacent streams for surface water management.

Amenity

'The Badgers', Quags Corner which is the nearest Listed Building, Severals House and the residential properties to the south of the site will be well screened by the retained woodland buffers and the soil screening bunds which provide both dust and noise mitigation. In addition to this, dust and noise management schemes will be implemented and adhered to throughout quarry operations to protect the local amenity. The site is located outside of an Air Quality Management Area and adjacent to the A272 for direct access to the local traffic network.

Traffic / Access

As considered previously by West Sussex, the site access to the A272 needs further assessment. There are three options available either creating a new direct access to A272, modifying the existing Severals Road or improvements to Woolmer Bridge crossing. This aspect will be further reviewed following a traffic assessment to determine the most appropriate option. The traffic assessment will also review the opportunity for all traffic to be diverted west thereby avoiding the centre of Midhurst. This opportunity would therefore reduce congestion and the resultant air pollution through Midhurst which is a key local traffic concern. All traffic aspects will be in accordance with Para 108 of the NPPF "opportunities for sustainable modes of transport have been considered, safe and suitable access to the site can be achieved".

END

Question 6

Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the 4SR?

No.

Question 7

Are there any sites that we should be considering, that are not included within the 4SR report?

No.

Question 8

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

The SA acknowledges that many assumptions have been made in reaching conclusions within the assessment. It is considered that a revised Sustainability Appraisal should be undertaken in support of the Soft Sand Review in light of further detailed information concerning the proposed development of the site. This SA should incorporate integrated and standard mitigation measures to identify potential impacts arising from the site.

Table 7.2 Summary of SA of Sites identifies the Severals sites as having a significant negative impact on the objective of protecting and enhancing the landscape, local distinctiveness and landscape character. This scoring is derived from the 'landscape sensitivity' of the site, not the realised impact of potential operations. The SA acknowledges that areas with poor landscape character could be enhanced through the creation of high quality restored minerals sites. The proposal for the Severals site is to restore the land to a mixture of broadleaf deciduous woodland and wet and dry heathland. These habitats will replace non-native coniferous plantation woodland and therefore will enhance the landscape character of the area resulting in a long-term positive effect. Furthermore, the proposed extraction areas for the sites

demonstrates that a woodland screening buffer can be retained, protecting long-distance views from areas to the south.

It is unclear why Severals West & East are given summary ratings (Table 7.2) of significant negative impact in relation to transport when the summary for these sites (Table 7.3) states that the developments will have a lower impact on transport. In addition the West Sussex Minerals Local Plan Transport Assessment stated that the site would have a 'Low / Medium Acceptability' in highways terms, but the SA has attributed the lower of these scorings applying a significant negative weighting. Notwithstanding the Transport Assessment concludes that 'from an access perspective, the site is suitable for allocation'.

It is noted that the methodology within the Transport Assessment used to determine 'acceptability', and therefore inform the Sustainability Appraisal outcome, not only considers the highway impact of the proposal (safety & capacity) but also the deliverability (land ownership) and financial viability of potential access arrangements. It is considered that the prospective mineral operator/site proponent is best placed to determine the financial viability of a site, taking into consideration capital costs associated with a particular access arrangement. It should be highlighted that the Transport Assessment analysed only two options for access to the site and that other options to achieve access may be available.

The SA objective that the site is assessed against is 'to minimise transport of minerals by roads. Where road use is necessary, to reduce the impact by promoting use of the Lorry Route'. Within this objective the SA assesses whether the site would optimise the use of the Lorry Route Network, reducing the use of rural roads, reducing the disruption and pollutants caused by HGVs. In simply utilising the 'acceptability' outcome within the Transport Assessment the SA has not assessed the impact of the site/s solely in line with SA objectives, but instead has also taken account of deliverability and viability. The SA has therefore mis-represented the merits of the site.

The site could have direct access to the A272 designated Local Lorry Route in accordance with SA assessment criteria. Any access arrangements would also be constructed to modern highway standards and specifications. This is as opposed to the extension of existing sites that may have lower standard highway arrangements but that are considered 'satisfactory for the development' as they have 'previously been used for quarry traffic'.

END

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)?

1st Principle - Places where there are opportunities to restore land beneficially:

The Severals sites provide a wide range of opportunities to restore the land for ecological, environmental and social benefits. The partnership approach with the mineral operator and the landowner will further benefit the development of the quarry and long term restoration benefits.

2nd Principle – Places without a sensitive natural or built environment and away from communities:

It can be demonstrated that the Severals sites can be designed with suitable screening and buffer zones to ensure mitigation of impacts to the local community and to protect the designation of the South Down National Park.

3rd Principle – Sites that have good access to the Lorry Route Network (LRN):

The Severals sites are located with direct access onto the main Lorry Route Network – A272 for both safe and efficient haulage of the aggregate to market.

4th Principle – The need to conserve and where possible enhance the protected landscapes in the plan area:

There are opportunities to protect and enhance the protected landscape prior to, during and post quarrying operations at Severals sites. Prior to the quarry development, advance planting and woodland screening will be undertaken to protect local and long distance views. The maintenance of the woodland screening and potentially further under-storey planting will be undertaken during quarry operations to ensure the screening is adequate and effective. The post quarry operation and restoration phase will positively enhance the protected landscape through woodland planting, diversity of tree species and the improved link to the local landscape setting.

5th Principle – Preference for extensions to existing sites rather than new sites, subject to cumulative impact assessments:

It must be noted that whilst there is a preference for extensions, there is a resultant impact of continued presence of the quarry operation on the local communities.

All sites should be assessed on a site by site basis whether they are extensions or new sites on sensitivity and deliverability.

END

Raymond Brown Quarry Products Limited
Severals East & West
near Midhurst, West Sussex

Soft Sand Site Selection Process for
West Sussex Joint Minerals Local Plan (JMLP)

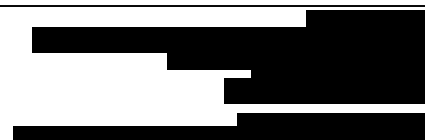
Hydrological and Hydrogeological Phase 1 Assessment

February 2019

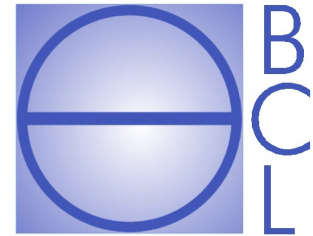
Report Prepared For:



Consultant Hydrogeologists Limited



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Severals East & West, near Midhurst, West Sussex:
Hydrological & Hydrogeological Phase 1 Assessment -
Selection process for West Sussex Joint Minerals Local Plan



February 2019

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Appendices

Appendix 1: Figures



1 Background

1.1 The West Sussex Joint Minerals Local Plan (JMLP) Soft Sand Sites Selection Report (January 2019) has shortlisted Severals East and West to be carried forward to the next stage in the allocation process.

1.2 As outlined in the following extract from the JMLP report, this is subject to completing a Hydrological & Hydrogeological Phase 1 Assessment for **Severals West**:

<p>Water environment (including flooding)</p>	<p>Habitat Regulation Assessment 2010/11:</p> <p>Site screened in for Appropriate Assessment: The site lies approximately 6km from Singleton and Cocking Tunnel SAC. There is no scope for adverse impacts on this European site. However, the site does include a watercourse that drains to the river Rother and ultimately into the Arun Valley SPA/Ramsar. There is therefore a potential pathway for sediment impacts so this site has been screened in for further consideration.</p> <p>Appropriate Assessment: Due to the effects of dilution the effect of Severals West on the SPA/Ramsar site would be negligible, particularly as the main channel of the River Arun does not form part of the SPA/Ramsar site. Secondly, it is assumed that sediment loading in watercourses near the site will be controlled by conditions since it is an offence to pollute surface watercourses.</p> <ul style="list-style-type: none"> • Flood zone 1(Site borders Flood zone 2/3) • Under climate change scenarios (updated February 2016), there is a 50% chance that the western edge of the site could fall within FZ2/3 as river levels could rise by between 10% and 40% during the three time periods (2020s, 2050s and 2080s) • Under climate change scenarios (updated February 2016), the adjacent river could rise by between 5% and 40% during the three time periods (2020s, 2050s and 2080s) due to peak rainfall allowances • Negligible risk to groundwater flooding (25% at higher risk) • Low risk of surface water flooding (5% at higher risk) • Groundwater levels likely to be high. Depth of working and de-watering operations will need to be explored and assessed. Would prefer no working below groundwater table. • Possible Water Framework Directive impacts – drainage to watercourse which drains to Rother to Arun <p>Risk Assessment of the water environment (Qualitative Hydrological & Hydrogeological Risk Assessment) - recommend phase 1 assessment prior to allocation.</p> <p>SFRA Update and Sequential Test of Mineral Sites September 2016: Development is appropriate as explained in the "Nature conservation and geodiversity designations" section of this document.</p> <p>Negligible risk of ground water flooding. Low risk of surface water flooding.</p>	<p>Red/Amber</p> <p>The site is near vulnerable water bodies (Severals Boq SNCI) which could be majorly impacted in the absence of a high level of mitigation.</p> <p>A Hydrological Risk Assessment would be required prior to allocation.</p>
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1.3 The key hydrological issues identified by the JMLP report are that:

- “The site contains Severals Bog Site of Nature Conservation Interest (SNCI C105) along the western edge. Even with a buffer strip, the bog habitat could be vulnerable to local changes in hydrology as a result of mineral working. Further assessment of groundwater issues is required”.
- “It has been considered that restoration proposals to heathland/woodland mosaic would be beneficial in the long term provided that a sufficient area of the site can be restored to land rather than wet restoration with the associated water quality issues that this involves”.

1.4 The JMLP report makes similar recommendations with respect to the water environment at **Severals East**, albeit with an “amber” score because there is greater standoff to the SNCI:

Water environment (including flooding)	<p>Habitat Regulation Assessment 2010/11:</p> <p>Site screened in for Appropriate Assessment: The site lies approximately 6km from Singleton and Cocking Tunnel SAC. There is no scope for adverse impacts on this European site. However, the site does include a watercourse that drains to the river Rother and ultimately into the Arun Valley SPA/Ramsar. There is therefore a potential pathway for sediment impacts so this site has been screened in for further consideration.</p> <p>Appropriate Assessment:</p> <p>There are adequate safeguards (dilution and planning conditions) in place to ensure that the site will not have an adverse effect on the Arun Valley SPA/Ramsar through reduced water flows or quality.</p> <ul style="list-style-type: none"> • Flood zone 1 • Negligible risk to groundwater flooding • Low risk of surface water flooding • Depth of working and de-watering operations will need to be explored and assessed • No working below groundwater table preferable • Risk Assessment of the water environment (Qualitative Hydrological & Hydrogeological Risk Assessment) - recommend phase 1 prior to allocation • Localised flooding experienced in 2013/14 at Woolbeding Estate and Gardens • Possible Water Framework Directive impacts – drainage to watercourse which drains to Rother to Arun • Any risk of sediment entering the watercourses which lead into the River Rother would need to be fully assessed and mitigated 	<p>AMBER</p> <p>Vulnerable water issues. EA to check.</p> <p>The risk and level of harm would be dependent on the depth of the proposed mineral working (above or below the water table) and the method of working.</p> <p>A phase 1 hydrological and hydrogeological risk assessment should be undertaken before allocation.</p>
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2 Data Sources, National Planning Policy & Technical Guidance

2.1 Both published and unpublished documents and other sources of information that have been examined include:

- Ordnance Survey (OS): Topographic maps at scales of 1:25,000 and 1:10,000.
- British Geological Survey (BGS): 1:50,000-scale published geological mapping. GeoIndex borehole records.
- Environment Agency (EA):
 - i. “The Environment Agency’s approach to groundwater protection” (February 2018, Version 1.2).
 - ii. Spatial mapping data: Flooding, Source Protection Zone (SPZ) and River Basin Management Plan (RBMP) maps.
 - iii. Radial search of licensed abstraction register.
 - iv. The “Arun & Western Streams Abstraction Licensing Strategy” (CAMS), dated March 2013.
- Council register of private water supplies.
- Natural England (NE): Spatial mapping & citation information for Designated Sites of ecological interest and local habitat information.
- “National Planning Policy Framework” (NPPF: Ministry of Housing, Communities and Local Government [MHCLG], July 2018).
- "Hydrogeological Impact Appraisal for Dewatering Abstractions", Boak R, Bellis L, Low R, Mitchell R, Hayes P, McKelvey P, Neale S , EA Science Report SC040020/SR1, April 2007.
- Landfill Developments: Groundwater Risk Assessment for Leachate (<https://www.gov.uk/guidance/landfill-developments-groundwater-risk-assessment-for-leachate>), published February 2016.
- “Flood Estimation Handbook (FEH) Web Service” (<https://fehweb.ceh.ac.uk/>), Centre for Ecology & Hydrology (CEH), February 2019.
- National River Flow Archive (NRFA).
- “Minsted Sand Pit, Hydrogeological Review, Midhurst, West Sussex v0.1” prepared by H2Ogeo for the Dudman Group, reference: 20160728 MgMConsulting, March 2014.
- “Initial Analysis of Groundwater Monitoring”, DK Symes, February 2009.
- “Minsted Quarry Hydrogeological Investigation”, DK Symes, February 2006.

3 Conceptual Hydrogeological Model

3.1 Site Location and Topographic Setting

- 3.1.1 The combined Site (Severals East & West taken together) is centred upon National Grid Reference (NGR) 486750 121300, which is some 1.5 km west of Midhurst. Please refer to *Figure 1 (Appendix 1)*.
- 3.1.2 The general slope of the land within the footprint of the Site is towards the southwest at a gradient of 0.025, declining from 50 metres above Ordnance Datum (maOD) at the northeast corner down to 30 maOD at the southwest corner.
- 3.1.3 This slope represents the west-facing flank of the valley of the Minsted Stream (also referred to as the Severals Stream), which passes alongside the western margin of the Site. The closest stretch of valley floor is at *circa* 25 maOD and descends in a northerly direction.
- 3.1.4 Severals Bog SSSI (SSSI C105) measures some 175m in length (north-south) by 115m maximum width (east-west), sitting alongside the central section of the western boundary.
- 3.1.5 The SSSI straddles the main stream (25 maOD at northern end of bog) and extends across the valley floor in the buffer zone between the stream and the Site boundary (30 maOD at eastern edge of bog).
- 3.1.6 A pre-existing quarry (Minsted Sandpit) occupies a very similar topographic setting to Severals East and West; but on the opposite flank of the valley.

3.2 Local Geology

- 3.2.1 The Site is underlain by the Folkestone Formation, part of the Lower Greensand Group. The BGS Lexicon describes the Folkestone Formation as comprising medium to coarse-grained, well-sorted cross-bedded sands and weakly-cemented sandstones. At Minsted Sandpit, the same formation is described as yellow to brown/beige fine sand with occasional laminations and cross bedding. There is a clay member within the Folkestone Formation, mapped by the BGS as outcropping upon the northern margin of the Site. Please refer to *Figure 2 (Appendix 1)*.

- 3.2.2 The Gault Clay Formation (overlying the Folkestone Formation) outcrops 575 m to the south, at closest approach.
- 3.2.3 The Folkestone Formation is underlain by the Marehill Clay (silty clays and clayey silts), which is the uppermost member of the Sandgate Formation. The Marehill Clay outcrops 80-230 m to the north of the Site.
- 3.2.4 Lower members in the Sandgate Formation include (in descending order) the Pulborough Sandrock (fine-grained soft sandstone), Rogate/Selham Member (Ironshot Sands) and Fittleworth Member (sandy clays and clayey sands). The Pulborough Sandrock is mapped at 175-260 m standoff to the north of the Site.
- 3.2.5 The Hythe Formation (underlying the Sandgate Formation) comprises glauconitic fine to coarse-grained sandstones. It is mapped at 450 m standoff to the north of the Site.
- 3.2.6 There are some localised drift deposits encountered upon the floor of the Minsted valley. This includes alluvial deposits following the line of the stream; and an expanse of river terrace deposits on the lower slopes of the east-facing flank of the valley (between Minsted Sandpit and the stream).

3.3 Hydrology

- 3.3.1 The Site falls within the catchment area of the Minsted Stream, which flows from south to north at the foot of the slope beneath the western boundary of Severals West. The minimum standoff is some 40-50 m from the Site boundary (60 m standoff from the extraction boundary). Please refer to *Figure 1 (Appendix 1)*.
- 3.3.2 The Minsted Stream is a tributary of the River Rother.
- 3.3.3 The catchment area of the Minsted Stream, measured upstream of Severals Bog, equates to 18 km².
- 3.3.4 There is no flow gauging data available for Minsted Stream.
- 3.3.5 The mean flow rate in the Minsted Stream catchment area (18 km²) has been estimated by reference to the NRFA flow duration curve taken from the nearest analogous gauged catchment area (River Rother at Iping Mill).
- 3.3.6 The River Rother at Iping Mill has a mean flow rate of 2.381 cumecs arising from a catchment area of 154 km².

- 3.3.7 By a process of interpolation, the mean flow rate on the closest section of Minsted Stream is estimated to be *circa* 0.278 cumecs.
- 3.3.8 The most recently-reported data on the Agency’s website indicates that the stream has “moderate” ecological status and “good” chemical status (2013-2016). The reason for not achieving good ecological status is given as “poor nutrient management” (diffuse pollution) related to agricultural/rural activities.
- 3.3.9 On a more detailed scale, there is a pair of drains running alongside the southern boundary of Severals West. The drains arise at around the 35-37 maOD contour (close to the southeast corner of the Site) and flow westwards down the flank of the valley, converging at the 30 maOD contour (close to the southwest corner of the Site) to form a single drain that joins the Minsted Stream at the upstream end of Severals Bog SNCI.
- 3.3.10 FEH mapping indicates that these drains have a catchment area of 0.75 km². Using the interpolation process outlined above, the mean flow rate at the outfall from these drains is estimated at 0.011 cumecs.
- 3.3.11 There is no water quality data for these tributary drains.
- 3.3.12 Background information describing Severals Bog has been obtained from a report entitled “Natural Environment”, prepared by the Stedham with Iping Neighbourhood Plan Steering Group, dated November 2017.
- 3.3.13 “According to an estate map of 1840, Severals Bog was formerly an Osier bed but is now dominated by Alder carr. Although small, the bog is of great interest for its plants, fungi and molluscs”.
- 3.3.14 “Severals Bog is dominated by Alder and Crack Willow. In parts, the bog is 3 m or more deep. The bog supports an interesting flora which includes Marsh-marigold *Caltha palustris*, Marsh Valerian *Valeriana dioica*, Opposite-leaved Golden-saxifrage *Chrysosplenium oppositifolium*, Wood Forget-me-not *Myosotis sylvatica*, Scullcap *Scutellaria galericulata*, Bog Pondweed *Potamogetum polygonifolius*, Wood Club-rush *Scirpus sylvaticus*, Greater Tussock-sedge *Carex paniculata* and Star Sedge *C. echinata*. Two fungi which are very rare in West Sussex, Bog Beacon *Mitrula paludosa* and Scarlet Elf Cup *Sarcoscypha austriaca* can be seen in the bog in spring. The mosses are also of note and include *Sphagnum recurvum* and *S. auriculatum*”.

- 3.3.15 “Considering the rather acidic nature of the bog, it supports an unusually diverse molluscan fauna. This may suggest that the area has experienced a long period with only minimal disturbance”.
- 3.3.16 “The drier edges of the bog support an uncommon plant, Climbing Corydalis *Corydalis claviculata*”.
- 3.3.17 The SNCI includes a small meadow on the opposite (west) bank of the stream. “The very rare Round-leaved Water-crowfoot *Ranunculus omiophyllus* occurs on bare, muddy patches in the meadow in late spring”.

3.4 Flood Mapping

- 3.4.1 Sand and gravel working is classed as “water compatible” development and can be undertaken in any flood risk zone.
- 3.4.2 The extraction footprint at Severals East and West is situated within Flood Zone 1 (“Low Probability”) *i.e.* less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%).
- 3.4.3 The higher risk flood zones (2 and 3) are confined to the floor of the Minsted Valley. The minimum standoff is some 40-50 m from the Site boundary (60 m standoff from the extraction boundary).
- 3.4.4 With regard to surface water flooding, the Site constitutes a sub-catchment that is largely isolated from runoff from adjacent land due to (i) the topographic setting and (ii) the existing configuration of field boundaries (*e.g.* hedgerows and farm tracks), which will intercept and divert any runoff coming from third-party land. Thus, the risk of surface water flooding is limited to the pair of drains alongside the southern boundary; and the low ground alongside the track running down the slope between Severals House and Severals Bog.
- 3.4.5 The risk posed by surface water flooding in a quarry setting is deemed manageable. The development is classed as “water compatible” in terms of fluvial flooding; therefore, the same would apply when considering the risk posed by surface water flooding.
- 3.4.6 There is no risk of reservoir flooding at this location.

3.5 Hydrogeology

- 3.5.1 The economic mineral at Severals East and West (Folkestone Formation) is classified as a Principal Aquifer, characterised by intergranular flow (but showing an element of fracture flow associated with harder sandstone and ironstone beds). Hydraulic conductivity can range from 3 to 60 m/day (typically 12 to 40 m/day), based upon data presented in “The Physical Properties of Major Aquifers in England and Wales”.
- 3.5.2 The base of the aquifer is defined stratigraphically by the poorly permeable Marehill Clay (reported as a leaky aquitard). The outcrops 80-230 m to the north of the Site.
- 3.5.3 The remainder of the Sandgate Formation is classed as a Secondary A Aquifer. This is mapped at 175-260 m standoff to the north of the Site.
- 3.5.4 The underlying Hythe Formation is classed as a Principal Aquifer. This is mapped at 450 m standoff to the north of the Site (at closest approach).
- 3.5.5 The Gault Clay, which overlies the Folkestone Formation, is a Non-Aquifer.
- 3.5.6 The drift deposits encountered upon the floor of the Minsted valley are of localised extent; but, grouped together with the Rother valley (Main River), they are shown as a Secondary A Aquifer.
- 3.5.7 Prior to installation of piezometers, a preliminary estimation of likely groundwater levels at the Site is informed by:
- Monitoring data collected in the vicinity of Minsted Sandpit, which occupies a very similar topographic setting but on the opposite flank of the valley.
 - Survey data where surface water features are judged to be in continuity with groundwater *e.g.* Minsted Lake (the ponding in Minsted Sandpit), the drains alongside the southern boundary of Severals West.
- 3.5.8 Ground levels on the hillside at Minsted Sandpit decline from 50 maOD at the western margin down to 35 maOD at the eastern margin. Data presented in the Hydrogeological Review for Minsted Sandpit (H2Ogeo) indicates that the water level in the lake is at 33 maOD (+/- 1 m seasonal variation).

- 3.5.9 Given its analogous topographic setting on the opposite flank of the valley, it is anticipated that groundwater levels at the centre of Severals West would equate to *circa* 33 maOD.
- 3.5.10 The piezometer network at Minsted Sandpit includes coverage of the lower slopes of the valley *i.e.* the buffer zone between the sandpit and the stream. Data recorded by DK Symes in February 2008 show that groundwater levels in the buffer zone decline in an easterly direction from 32 maOD (eastern margin of lake) to 28 maOD (foot of slope). By extrapolation, groundwater level at the western margin of Severals West is anticipated to be close to 28 maOD.
- 3.5.11 Assuming the hydraulic gradient on the eastern side of the valley is a mirror image of the pattern on the opposite/western side of the valley (as observed by DK Symes in 2008), an initial estimate of groundwater level at Severals East is given as 35-37 maOD. This roughly coincides with the elevation at which the surface water is mapped to arise in the drains alongside the southern margin of the Site.
- 3.5.12 The background information for Severals Bog mentions “the rather acidic nature of the bog” (*section 3.3.15*).
- 3.5.13 This is borne out by the groundwater quality data collected from the piezometers at Minsted Pit, where pH readings of 4.26 to 6.6 have been recorded by H2Ogeo. This is lower than the published range for the Lower Greensand (6.02 to 7.9, with a median of 6.6).

3.6 Local Water Supplies

- 3.6.1 An up-to-date list of licensed abstractions is awaited from the Agency. In the interim, the information presented in the Hydrogeological Review for Minsted Pit suggests that there are no licensed groundwater abstractions within 0.5 km radius of Severals East and West. The closest groundwater supplies are at Minsted Lake (on the opposite side of Minsted Stream) and at Stedham (on the floor of the Rother Valley, upstream of its confluence with Minsted Stream). Please refer to *Figure 1 (Appendix 1)*.
- 3.6.2 The closest surface water abstraction is taken from the Minsted Stream at Woolmer Bridge, some 200 m downstream from the northwest corner of Severals West.

- 3.6.3 The Site does not overlap with any Source Protection Zone (SPZ). The nearest SPZ is at 1.85 km standoff to the northeast. This relates to an abstraction in the Hythe Formation.
- 3.6.4 The Environmental Protection Technical Officer at Chichester District Council has been consulted with regard to any local properties on the Private Water Supplies Register. The closest registered supply is 2.65 km to the west of the Site.
- 3.6.5 The Register only holds information about Private Water Supplies that have been registered with the Council. There may be other unregistered Private Water Supplies in this area; and these would be identified by visiting any isolated properties bordering Severals East and West to confirm whether they have mains water supply.

3.7 Summary of Conceptual Hydrogeological Model

- 3.7.1 The conceptual model of the baseline hydrogeological conditions at Severals East and West demonstrates that groundwater in the economic mineral (Folkestone Formation) is anticipated to flow from east to west, providing baseflow to the closest stretch of the Minsted Stream.
- 3.7.2 The hydrology of Severals Bog is judged to be in continuity with the groundwater flowing across the central section of Severals West.
- 3.7.3 Groundwater passing beneath the southeast quadrant of Severals West is likely to come to surface in the drains at the southern boundary of the Site. This would only constitute a minor contribution to the flow regime in the drains, because these drains have an overall catchment area of 0.75 km²; the bulk of which is upon the Folkestone Beds.
- 3.7.4 There are no licensed or private groundwater supplies identified as abstracting from the local section of Folkestone Beds.

4 Preliminary Assessment of Potential Impacts and Options for Mitigation

4.1 Outline Working Scheme

- 4.1.1 Outline proposals show the floor level in the restored void at Severals West sloping from the northeast corner (35 maOD at the foot of the batter slope) down to southwest margin (32-33 maOD). Given the area of Severals East (and the constraints imposed by maintaining a safe batter slope), the floor level is likely to be restricted to 37-40 maOD.
- 4.1.2 Site piezometers will need to be installed to allow accurate quantification of spatial and seasonal variations in groundwater levels across the Site.
- 4.1.3 Severals East, with floor level at 37-40 maOD, is expected to be worked dry (subject to further investigation by drilling and monitoring of piezometers).
- 4.1.4 The initial broad-brush estimate of likely groundwater levels at Severals West, as outlined in *section 3.5*, suggests that any groundwater seepage occurring at the base of batter along the northern and eastern margins will tend to be lost through the floor as it drains towards the western and southern half of Severals West. As above, this would be subject to further investigation by drilling and monitoring of piezometers.
- 4.1.5 Where required, ingress water would be detailed to collect in a drainage grip and directed into the wet heath to be established in the southern half of the Site.
- 4.1.6 Surplus water would discharge into the pre-existing drains upon the southern margin and flow into the Minsted Stream.

4.2 Risk of Impact as a result of Dewatering Drawdown

- 4.2.1 By excavating into the hillside at Severals West, it is anticipated that there will be some passive lowering of groundwater level along the northern and eastern margins due to seepage from the base of the batter slopes.
- 4.2.2 The radius of influence can be estimated using a simplified analytical approach detailed in CIRIA (Construction Industry Research and Information Association) Report 113.

4.2.3 Assuming 2-3 m of passive drawdown of the watertable; and taking a hydraulic conductivity of 20 m/day: the radius of influence would extend by 100-150 m to the north and east of the Site. This does not overlap with any of the surface water receptors identified in the conceptual model.

4.3 CAMS Strategy

4.3.1 The Site is located upon Groundwater Body GB40701G503100: “Lower Greensand Arun & Western Streams”.

4.3.2 Water resource availability mapping in the CAMS document indicates that there is restricted water available for licensing. Water resources are available 30-50% of the time.

4.3.3 There is a presumption against new groundwater abstractions.

4.4 Risk of Impact upon Surface Water Receptors

4.4.1 The most sensitive receptor is the hydrological regime at Severals Bog, which is in continuity with the groundwater system beneath the central portion of Severals West.

4.4.2 The intention is to collect any groundwater seepage occurring at the northern and eastern margins of the extraction area and allow it to infiltrate through the floor as it drains towards the western/southern side of the Site. This should support the groundwater baseflow regime at the eastern side of the Bog (working in combination with the buffering effect of the Minsted Stream on the opposite side).

4.4.3 Further protection could be afforded by diverting the drains coming down the southern side of the Site. At present, these combine to form a single tributary that joins the Minsted Stream immediately upstream of the Bog. The topography is favourable for re-routing the ditch so that it passes between the Site and the Bog. This re-aligned ditch could be utilised for targeted discharge of water into a recharge trench (in support of groundwater baseflow to the Bog) or for direct replenishment (via seepage into the eastern margin of the Bog).

4.4.4 These drains are fed by groundwater seepage emerging from the Folkestone Formation on the west-facing slopes of the Minsted Valley. As such, the water quality in the groundwater-fed drain should be in line with baseflow quality in the Folkestone Formation beneath the bog.

4.4.5 Clearly, this would need to be verified by a programme of sampling and laboratory analysis.

4.4.6 Ground elevation at the Bog is lower than the floor level in the restored workings, meaning that the above options for mitigation can be delivered passively (under gravity) rather than requiring long-term pumping.

4.5 Protecting Water Quality

4.5.1 The operation of mobile and fixed plant presents a risk that pollutants may enter groundwater as a result of hydrocarbon spillage or leakage on Site. Such sources are identified as fuel, lubricating and hydraulic oils. Experience has demonstrated that the risk of such a pollution incident in a quarry setting may be minimised by application of the following measures and training:

- The operator will adhere to a code of practice for the refuelling of machinery. Such work shall be carried out only by trained personnel and take place within a surfaced area equipped with surface water interceptors and bunded tanks. No refuelling or maintenance should be carried out in areas of mineral working.
- Operators shall check their vehicles on a daily basis before starting work to confirm that leakages are not present. Operators will report any defect to ensure that repairs are undertaken to that vehicle before it enters the working area.
- Sufficient oil sorbant material (*3M Oil-Sorb* or similar) shall be available on Site to cope with a loss equal to the total fluid content of the largest item of plant.
- Following the use of such oil sorbant material, any contaminated materials shall be disposed from Site in accordance with current tipping legislation.
- Adequate containment should be provided for all oils stored on the Site, to be equipped with bunds complying with the relevant British Standard.
- Environmental Toolbox Talks, Emergency Spill Training and compliance to procedures within the Company's Environmental Management System.

4.5.2 The implementation of the treatment systems, engineering measures and fluids handling protocol advanced to protect groundwater quality will, in turn, serve to safeguard the surface water environment and water supplies.

4.6 Restoration Materials

- 4.6.1 There may be a requirement to place inert materials on site in order to achieve the restoration objectives. The Operator would only be importing limited quantities of inert materials *i.e.* sufficient to regrade the faces to a shallower angle; but such materials would not be used to cover the floor of the workings.
- 4.6.2 The “Environment Agency’s approach to groundwater protection” (February 2018 Version 1.2) has been consulted:
- 4.6.3 “An inert landfill does not pose a potential hazard to groundwater (and hence it is not necessary to collect leachate and no drainage system is required). The Environment Agency will not object in principle to such a landfill on the basis of the location position statement E1, unless the site falls within a SPZ1”.
- 4.6.4 As explained in *section 3.6*, the Site does not overlap with any SPZ. The nearest SPZ is at 1.85 km standoff to the northeast. This relates to an abstraction from a separate aquifer (the Hythe Formation).
- 4.6.5 On the basis of baseline study and subsequent Phase 1 assessment, there are considered to be no over-riding hydrological or hydrogeological related reasons why the Proposal Site (Severals East and West) should not be promoted to the next stage in the JMLP allocation process.



Raymond Brown Quarry Products Limited

Severals East & West near Midhurst, West Sussex

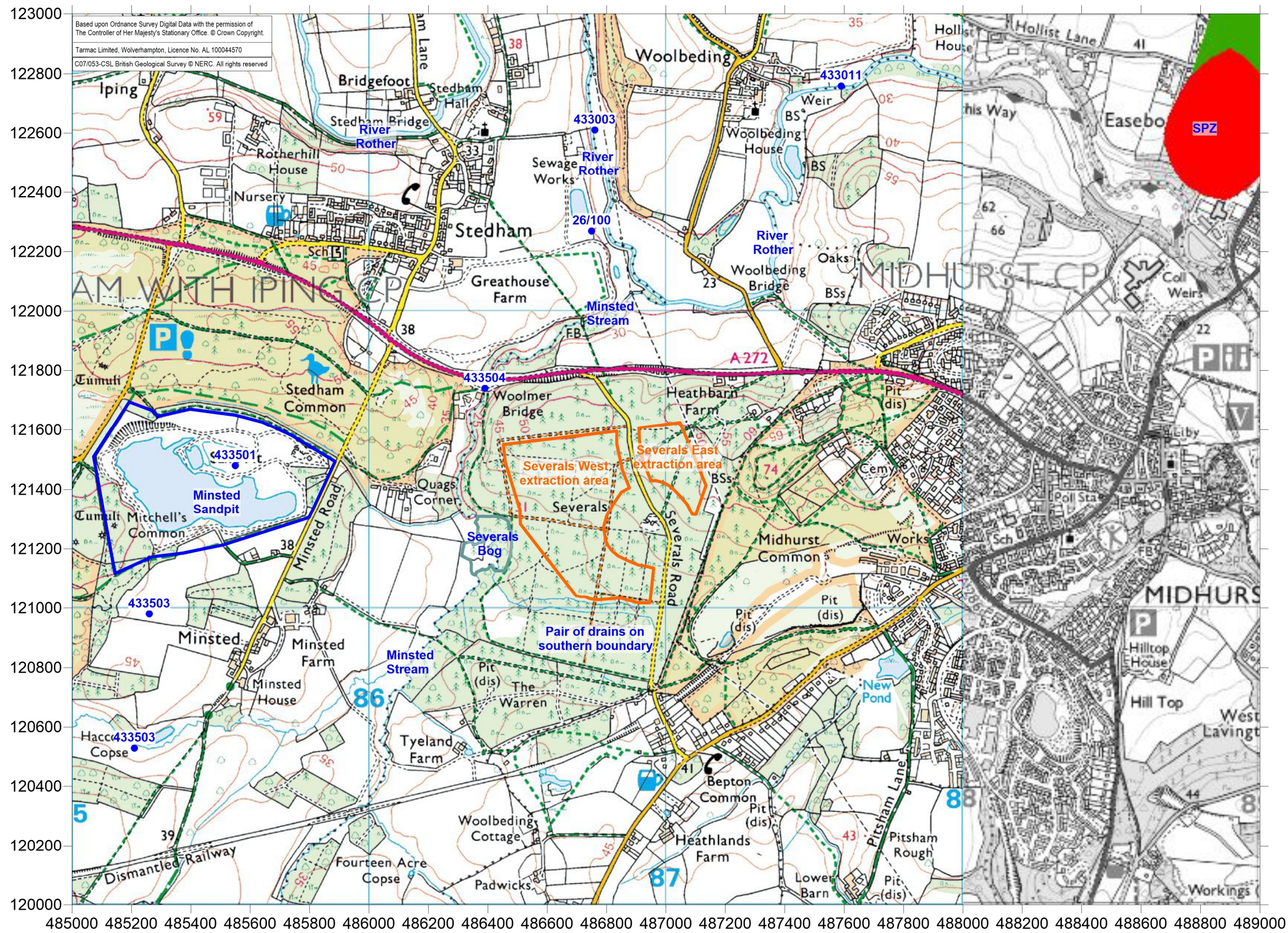
Soft Sand Site Selection Process for
West Sussex Joint Minerals Local Plan (JMLP)

Hydrological and Hydrogeological Phase 1 Assessment

February 2019

APPENDIX 1 Figures



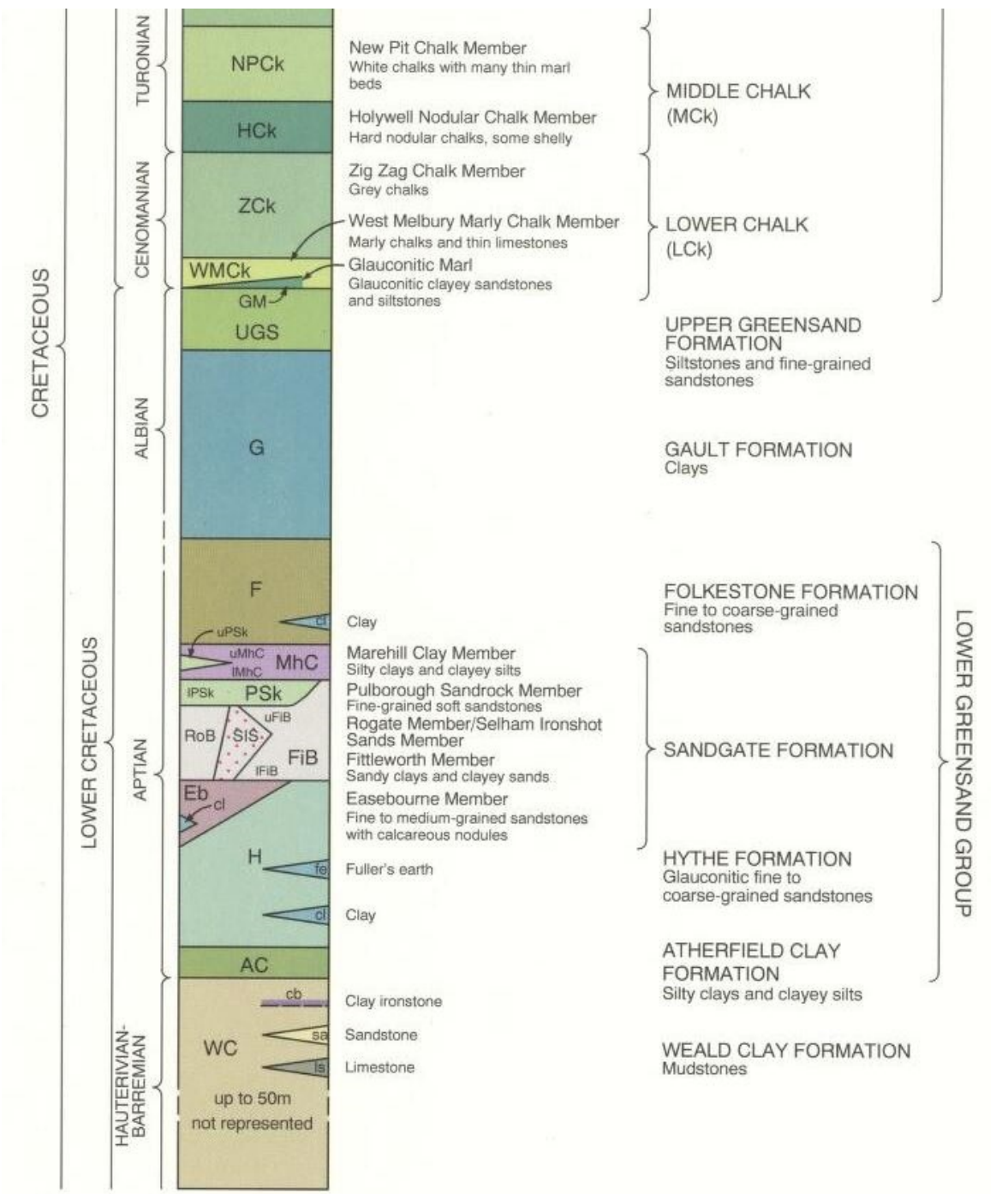
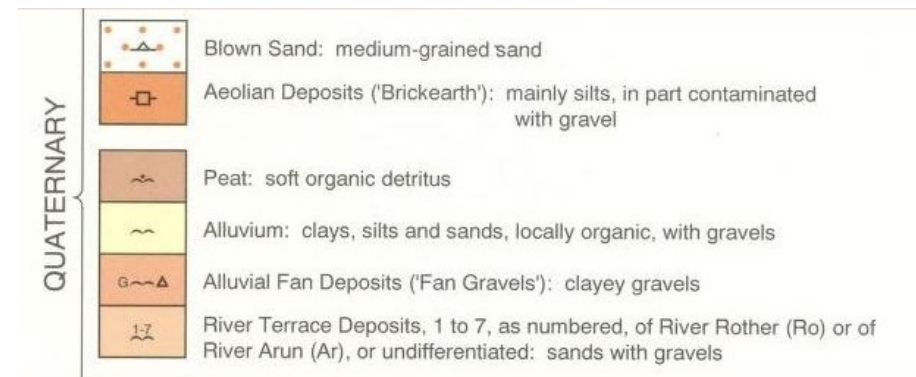
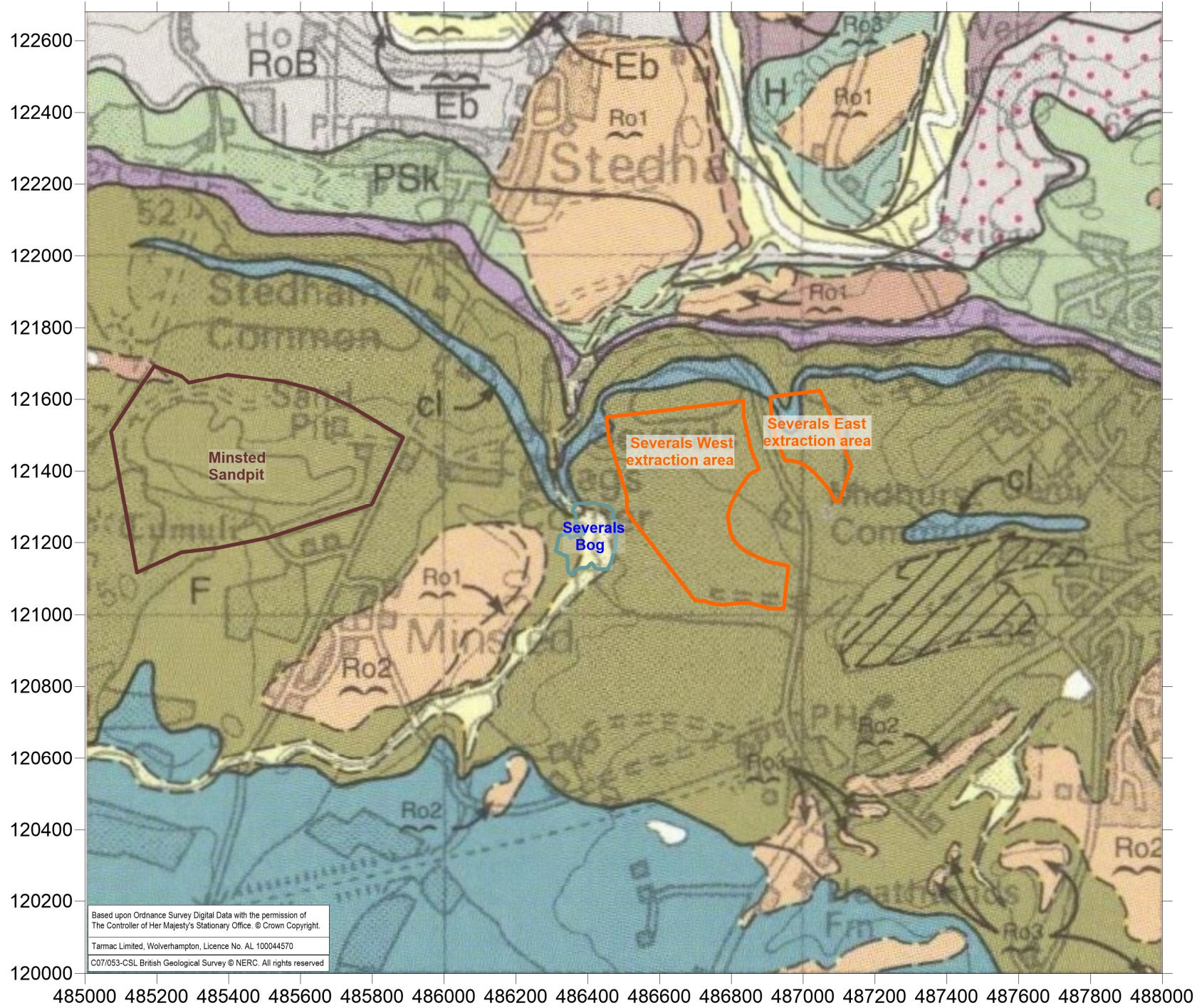


- Extraction Areas
- Name ● Licensed Water Supply

SE

Severals East and West
 Topographic and Hydrological Setting

Drawn By: HL	Scale: 1:15,000
Date: Feb 2019	Figure No: 1



BCL

Severals East and West
 Geological Setting (Extract from BGS 317 & 332)

Drawn By: HL	Scale: 1:15,000
Date: Feb 2019	Figure No: 2

WEST SUSSEX SOFT SAND REVIEW: ISSUES AND OPTIONS

Please complete and return this form to Planning Services, West Sussex County Council, County Hall, Chichester, PO19 1RH by **18 March 2019**. Visit our website for further information: www.westsussex.gov.uk/mwdf.

Data Protection/Privacy: West Sussex County Council is registered as Data Controller(Reg. No. Z6413427). For further details and information about our Data Controller, please see www.westsussex.gov.uk/privacy-policy.

PART A: PERSONAL INFORMATION

A1. Personal Details

Name	<input type="text" value="Stephen Morley"/>
Job Title (where relevant)	<input type="text" value="Midhurst Town Councillor & Chichester District Councillor"/>
Organisation or affiliation (where relevant)	<input type="text" value="as above"/>

A2. Client Details (if applicable)

If you are completing this form on behalf of someone else then please provide details of the person(s) or organisation you represent.

Name	<input type="text"/>
Job Title (where relevant)	<input type="text"/>
Organisation or affiliation (where relevant)	<input type="text"/>

A3. Contact Address Details

Please provide details of the person who should be contacted regarding this response

Address	<input type="text"/>
Telephone	<input type="text"/>
Email	<input type="text"/>

Preferred Method of Contact Post Email

Please tick all categories below that most adequately describe you.

- | | | |
|---|---|--|
| <input checked="" type="checkbox"/> Resident | <input checked="" type="checkbox"/> Parish/Town Council | <input type="checkbox"/> SDNPA Member |
| <input type="checkbox"/> Local Business | <input checked="" type="checkbox"/> District/Borough Councillor | <input type="checkbox"/> Government Organisation |
| <input type="checkbox"/> Minerals or Waste Industry | <input type="checkbox"/> County Councillor | <input type="checkbox"/> Non-Government Organisation |
| <input type="checkbox"/> Landowner | <input type="checkbox"/> Local Authority | <input type="checkbox"/> Other (please specify) |

If you submit a consultation response, your contact details will be used to automatically notify you of updates with regards to the soft sand review and minerals and waste planning policy. Please tick the appropriate box if you **DO NOT** wish to be notified of the following.

- Progress and consultation on the Soft Sand Review
- Any further updates about Strategic Waste or Minerals Planning in West Sussex

Question 5: Do you have any comments on the nine shortlisted sites identified in the Issues and Options Consultation Document?

Please tick all that apply and provide comments below.

- Buncton Manor Farm Chantry Lane Coopers Moor Duncton Common
 East of West Heath Common Ham Farm Minsted West Severals East
 Severals West

I do not intend to expand or go in to detail about my list of objections as I am certain that you will appreciate and understand the basic premise. However, my first objection is my main objection and I do therefore offer a little more detail as to the reasons why

1 The danger of increased air pollution in Midhurst

I sit on the Air Quality Review Group at Chichester District Council. I am therefore very aware of the ongoing air pollution in the centre of town at Rumbolds Hill. All indications are that this is caused by vehicles stuck in traffic jams caused by the bottle neck at this location and the pedestrian crossings in North Street. Neither the bottle neck nor the pedestrian crossings can be removed and therefore more vehicles can only increase the pollution. The quarrying of sand at The Severals will increase the lorry movement numbers and Midhurst will be choked to death. No-one will want to visit and more will want to leave.

This may sound a little drastic but it is a possible outcome that The SDNPA's HQ will be at the northern end of a ghost town's high street.

I would suggest that maybe this could be avoided if The Cowdray Estate made land available for a town by-pass... but we all know Lord Cowdray's feelings about lorries, noise and air pollution so a by-pass is not likely.

2 Not enough research and assessment in to the hydrological ramifications of a quarry at this location

3 There is a watercourse that drains from The Severals site to the River Rother. This could have a disastrous impact on the river's ecology unless serious and intrusive measures are taken to avoid such an outcome. South Pond in Midhurst is an excellent example of how serious this problem could be. Sand runs off the fields at the southern end of town and continually silts up this pond.

4 The Severals Bog is another eco-site that would be threatened by the quarrying of sand at this site

5 Public Rights of Way through, in and around the sites would be threatened.

6 The landscape would be scarred by quarries of this magnitude. Whether seen from the A272 by passers-by (cyclists and drivers) or from The South Downs Way to the south or the sandstone ridge on the north side of the valley.

ii) Surrey County Council would be concerned with a heavy reliance on 'Option C: Supply from areas outside West Sussex' for two reasons. First, that as Surrey is a main supplier of soft sand within the South East region, a heavy reliance on this approach would increase the demand for Surrey's soft sand to such a level that there would be significant stress on Surrey's reserves. As already mentioned, whilst Surrey does have notable soft sand reserves, they too are heavily constrained by the Surrey Hills Area of Outstanding Natural Beauty. Whilst it is understood why West Sussex are seeking to avoid extraction in the National Park this cannot reasonably be at the cost of redirecting pressure for soft sand extraction to the Surrey Hills Area of Outstanding Natural Beauty.

Second, that as a neighbouring authority, Surrey County Council would be concerned by the impact that relying heavily on imported soft sand could have on the surrounding road network. Surrey County Council would be particularly concerned by West Sussex relying heavily on imports due to the potential implications such an increase could have in terms of HGV movements specifically on those major routes listed that are within Surrey (M25, M23, A3, and M3).

iii) Surrey County Council welcomes the reference to the regional approach to soft sand provision in the South East and the Statement of Common Ground being prepared by the South East of England Aggregates Working Party (SEEAWP) authorities.

I hope the above comments are useful to you.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Sent: 17 March 2019 20:14
To: PL MWDF
Subject: Sand Pits. Bepton

I notice that the Cowdray estate has applied for Planning permission to excavate sand from pits in Bepton. I would like to add my voice to the opposition to this proposal. Apart from desecrating a most beautiful area greatly used by the community as a place to walk and enjoy the countryside ,access to and from it is totally unsuitable for the level of large lorries that will follow. The noise for those that live in the area would be intolerable which together with the ensuing pollution that would naturally follow make this a totally unsuitable development for this area of unspoilt countryside situated in the South Downs National ,an area of outstanding natural beauty.

I would hope that this act of vandalism would be refused planning permission.

[REDACTED]

[REDACTED]

[REDACTED]

Reference: X:15.1.2/5/4

Communities
Planning and Place
County Hall
New Road
Oxford
OX1 1ND

Planning Services
West Sussex County Council
County Hall
Chichester
PO19 1RH

[REDACTED]
[REDACTED]
18th March 2019

[REDACTED]

Duty to Cooperate - West Sussex Soft Sand Review: Issues and Options Consultation

Thank you for your letter dated 21st January regarding your soft sand review. Please find our responses to your questions below.

Question 1

- a) Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.
- b) Do you think that there are any other matters that should be taken into account when determining the need for soft sand?
- c) Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Response

Q. 1a): We consider that scenario 3 should be used.

Reasons: This would be in line with the conclusion in the West Sussex LAA 2018 (see Dashboard and Table 21) and would therefore be consistent with Policy M2 which refers to calculation of shortfall in the most recent LAA. It would also continue the existing approach taken in the Adopted West Sussex Minerals Local Plan to plan for the highest demand scenario, to ensure that sufficient provision is made. Use of the upper level demand scenario is supported by the three year sales average for soft sand being higher than the 10 year sales average and the additional demand for housing identified in the LAA. It would provide flexibility to ensure future need for soft sand in West Sussex can be met.

Q 1b): No. We consider that the relevant matters have been taken into account in the LAA 2018 in coming to the conclusion that demand forecast scenario 3 should be used in determining the LAA rate for soft sand.

Q 1c): No. We are not aware of any information/evidence at this time to indicate that any different amount of soft sand should be planned for in West Sussex to 2033. However, ongoing monitoring through subsequent LAAs and AMRs will indicate whether demand forecast scenario 3 remains appropriate or whether the planned level of provision should be reviewed.

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?
- 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?
- c) Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Response

Q 2a): The five options included in the soft sand review consultation document appear to cover all the reasonable alternatives for soft sand supply that should be considered.

Q 2b): We consider that to be a 'reasonable alternative', option Option C: Supply from areas outside West Sussex should be limited to those areas within a realistic transport lorry distance from West Sussex. Whilst the adjoining or nearby soft sand producing counties of East Sussex, Hampshire, Surrey and Kent should be included, we consider it would not be reasonable to include more distant potential sources such as Oxfordshire. Given the location of the soft sand resource in Oxfordshire, there is no realistic scope for transporting sand by rail to West Sussex (even if it were economic to do so); and transport by road would involve a driving distance of at least 100 miles, raising sustainability concerns.

We consider that Option D: Supply from alternative sources including marine-dredged material needs to be used with caution because of the uncertainty over the feasibility of supply at any significant level from marine-dredged sources, as identified in the draft SA and in line with previous conclusions (including the Inspector's report on the examination of the West Sussex Minerals Local Plan) and the position set out in the LAA 2018. We are not aware of any more recent information that would change this position and make alternative sources including marine dredged material feasible. We therefore consider that Option D is not a realistic option on its own but we recognise that it could possibly form part of a combination option under Option E.

Q 2c): In order to minimise mineral transport distances, we consider that the West Sussex Plan should aim to make full provision from land-won sources within the County but that if this cannot be achieved acceptably then supply from land-won sources in adjacent / nearby counties and possibly also to a limited extent supply from alternative sources such as marine-dredged aggregate should be considered. Therefore, Option B should be considered first and only if it is not possible to make full provision in an acceptable manner from this option an Option E involving a combination of Options B, C (adjacent / nearby counties only) and D should then be considered. However, Oxfordshire CC would be concerned if an increased reliance in West Sussex on supply of soft sand from adjacent / nearby counties had the knock-on effect of increasing demand for soft sand in Oxfordshire in order to make up an overall shortfall of supply in the region. Whilst the level of provision for soft sand set in the Oxfordshire Minerals & Waste Local Plan Core Strategy includes an appropriate contribution to wider needs for aggregate minerals, this is based on the pattern of supply and demand at the time the evidence base for the Core Strategy was prepared and it does not include making increased provision to meet a shortfall created by a reduction in supply elsewhere in the region.

Question 3

Do you have any comments on the Draft SA of the Options?

Option C has the potential to significantly impact on a wide range of factors, not just air quality, and these would need to be sufficiently assessed and considered as part of the sustainability appraisal. The potential sustainability impacts on the wider area, not just West Sussex, should be considered. As mentioned above (response to Q 2c)), if adjacent / nearby counties have to make increased supply to meet a shortfall in West Sussex this could result in reduced supply to those counties and to other counties nearer Oxfordshire, leading to an increase in demand for supply from Oxfordshire. The sustainability implications of this should be considered.

Question 4

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

As the Inspector who undertook the recent examination of the West Sussex Minerals Local Plan found the site selection methodology and its application, including the traffic light system, 'robust and sound', we consider it appropriate for this to be used as the basis for site selection (subject to any necessary updating).

Question 5

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

Question 6

Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the 4SR?

Question 7

Are there any sites that we should be considering, that are not included within the 4SR report?

Question 8

Do you have any comments on the SA of the potential sites

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 sites?

Oxfordshire CC has no comments to make on the sites listed or on the SA of them. It is considered that neighbouring Authorities to West Sussex are better placed with local knowledge to comment on individual sites.

If you have any questions about any of our responses please do not hesitate to get in contact and we will be happy to help.

Kind Regards

[Redacted signature block]



Date: 18 March 2019

Planning Services (Ref. SSR)
West Sussex County Council
County Hall
Chichester
West Sussex
PO19 1RH

Sent by email only to: mwdf@westsussex.gov.uk



Dear Sir/Madam,

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

Please find West Berkshire's comments on this consultation as follows:

Question 1

It is acknowledged that West Sussex has thus far intended to plan for the highest aggregate demand scenario in preparing the Joint Minerals and Waste Local Plan. This can be a robust approach where there is an abundance of unconstrained resources, in order to ensure a 'worst case' scenario can be planned for. However, where mineral resources are constrained, it may be prudent to consider whether these constraints are such that they would influence the ability to achieve a given level of supply, in line with Minerals Planning Practice Guidance (PPG) Paragraph 062 (Reference ID: 27-062-20140306). This would come under 'other relevant local information' as outlined in paragraph 207(a) of the NPPF.

If there are sufficient deliverable resources identified outside of environmentally constrained areas to deliver the lower demand scenarios, this may be a justification for choosing a lower demand scenario. In addition, if exceptional circumstances are determined to exist, and deliverable sites are identified within a designated landscape, only identifying the minimum demand necessary, with a commitment to monitoring the situation and allocating more in future if necessary would be preferable to potentially over-allocating sites within the designated landscape.

Consideration of the three-year average of sales may also be relevant in determining the general trend of demand, as outlined in PPG paragraph 064 (Reference ID: 27-064-20140306).

Question 2

An additional alternative would be to consider identifying preferred areas or areas of search instead of/in addition to specific sites (Options A&B). This approach is acknowledged in PPG paragraph 008 (Reference ID: 27-008-20140306). This approach is seen as less preferable than designating specific sites where these are available and may only be appropriate if insufficient suitable sites are found.

Please help us save paper and reply electronically

It is assumed that further research/investigation is being undertaken as to the feasibility of alternative sources of soft sand supply to meet demand in West Sussex (Option D). It is acknowledged that West Sussex County Council is undertaking work through the Duty to Cooperate to determine whether there is potential to supply soft sand from outside the Plan area (Option C).

Question 3

No comments on the draft SA of options.

Question 4

No comments on the site selection methodology

Question 5

No comments on the nine potential sites

Question 6

No comments on the 12 non-shortlisted sites

Question 7

No comments

Question 8

No comments on the SA of potential sites.

We wish to be updated with the progress and consultation on the Soft Sand Review.

Yours faithfully,

██████████
██

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

How can you make a decision when the figures are so vague

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

Yes - you need to know exactly what you have available in existing quarries before looking for new sites that would have significant negative impact. Before digging up the National Park -explore marine sand in more detail.

Also housing demand figures need to be accurate.

Look for greener house building - less sand used

Stricter rules and enforcement regarding planning control and breaches off this e.g.. Minsted Quarry near to Midhurst has been halted due to breaches for the last 5 years and has been over excavated. Sort these problems first before creating more!

Pendant has toxic water lying there - why is this not being addressed - perhaps these issues are in other dishes quarries too??

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Again need to make these judgements from accurate figures - not wide range- otherwise this is based on flawed information.

The commercial confidentiality is a real stopper here if it is unknown what is actually in the store cupboard already so to speak.

Part C - Issue 2

2a Do you consider that all 'reasonable alternatives' for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

Look at the quantities that we are exporting to other counties before identifying what West Sussex needs to provide -this seems imbalanced to say the least.

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

Where have you got your figures from for the quantities of soft sand in each site?

Don't believe the figures to be accurate - you need to look again at what is there already that could already meet the questionable accuracy of the predicted need for 2033!

Why would you choose to relook at sites that were removed for deliverability issues previously on several occasions - and are sites that would have a massive negative impact on the surrounding areas for many reasons? Purely because they have been put forward by the land owner who stands to gain financially and that is their only motivation.

For all the below reasons -

biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape

Seems like a time wasting and money wasting exercise.

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

Where is there a demonstration of exceptional circumstances that make minerals development within the SDNP acceptable?

What are the exceptional circumstances? How have they been defined?

This is why the site selection process can not continue in the SDNP. The MLP Inspector raised the issue of "exceptional circumstances" but in reopening this review his report stated that "there is the potential, in the future, for exceptional circumstances"(Para 15). That means that no exceptional circumstances exist at present and therefore mineral development in the SDNP is not acceptable!

The inspector seems to be going against policy by ignoring the exceptional circumstances criteria for selection of sites within the SDNP. The requirement for demonstration of exceptional circumstances is a matter of legislation rather than simply policy.

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Yes there is inaccurate information - like - Severals East and West is in Woolbeding Parish !! Asks the question what other inaccuracies are there?

Where you are talking about yields - these figures differ through out

Also it talks of minimal impact - totally incorrect and talks of linking the serpent trail? This runs direct through the land - a quarry would desecrate the serpent trail -

so the document does not accurately depict the issues for the several east and west sites.

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

Talks of impact reports? Where are those ?

This methodology is flawed -

This was just put forward by the land owner and such hasn't been part of sensible methodology of site selection

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Minsted West, Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

Severals East And West are regularly used for recreational purposes. Someone once said to me they are the "lungs" of Midhurst. There are few places to walk like it -diverse nature and wildlife.

Rural roads in the area don't have th infrastructure to support an industrial quarry such as this.

No amount of repair could put back what is currently there.

Moneys spent to encourage the Heathland Corridor and Serpant Trail would be lost -and going backwards not forward

The noise and pollution for us living so close would be horrific to live next too, I worry for our health and well being of all the local people.

Seems crazy to dig this beautiful place up when we would be considering being more environmentally concious.

Minted was quarried for 60 years and has never been put back!! It has stood for 5 years as a horrific dead area with many breached of planning control. Pendean stands with toxic water - It would ruin the area

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

Only that if they were taken off - it makes no sense that Severals East and West have been included!!

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

Alternative resources like marine sand and reducing the use of this finite resource

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

Yes it is incomplete and inaccurate

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)?

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)?:

Don;t understand how one inspector's opinion can go against the whole strategy of the purpose of a National Park - if we can dig up the SDNP - then it put to question the reason for having National Parks!! How terrible and how sad!

Part E - About You (The Equality Act 2010)

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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Planning Services
Soft Sand Review
West Sussex County Council
County Hall
Chichester
PO19 1RH

Date: 16 March 2019

Ref 4/19

Dear Planning Services

**West Sussex Joint Minerals Local Plan
Single Issue Soft Sand Review Issues and Options Consultation (Reg 18) Jan 2019.**

Personal Details: Residents of Heathfield Park Midhurst – Compiled on their behalf by the Board of Directors Heathfield Park (Midhurst) Ltd

Category: Residents

A number of residents found the computer based consultation process difficult to respond to so it was felt that an on-block response would represent their objection more fully.

Heathfield Park lies to the east of Midhurst Common just over ½ mile from the Severals East site. Because the prevailing wind is SW Heathfield Park would be directly affected by both noise and dust.

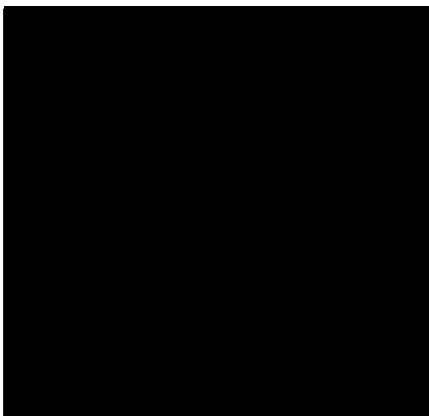
The undersigned residents, family and friends of Heathfield Park OBJECT to the inclusion of the Severals West and Severals East as potential sites, within the Joint Mineral Local Plan, where soft sand maybe extracted.

The undersigned OBJECT on the following grounds: including additional door step views.

- Landscape and Conservation impact – both sites are part of the Heathland Reunite Project – creating wildlife corridors by expanding and connecting rare heathland habitats. The Heathland corridor is extensively used by a considerable number of residents and their families for recreation and wellbeing. Residents are protective of and proactive in the protection of this rare heathland environment.
- HGV Lorries will increase through Midhurst in all directions – Chichester, Petworth and Petersfield. Residents consider vehicle movements in particular HGV lorries through Midhurst to be at saturation point now. The prospect of the massive increase of lorry movements associated with sand extraction at the Severals would be unacceptable.
- Public Rights of Way will be affected. The large number of foot paths link Midhurst Common joining the Serpents Way across the Severals and onto Minstead and Iping and Trotton Commons. These footpaths are at the heart of SDNP and public access is highly valued by our residents and their visitors.

- Light Pollution on any extraction site and along the Severals Road, with similar potential at any new road junctions with the A272 This would go against the SDNP Dark Nights Initiative and industrialise a rural area.
- Air Quality – Midhurst is now an Air Quality Management Area. Rumbolds Hill exceeds EU air quality targets now. At either end of Midhurst and lying along the lorry route are the areas 2 main schools. The protection of our young from harmful particulates associated with lorry emissions should be of the highest priority
- Cumulative impact – from other sites like the backfilling at Pendean and the quarry at Minstead This should not be underestimated

Yours sincerely



Say No To Cowdray Sand Quarries

We the undersigned raise the following objections to Sand Quarries on Severals Road.

Landscape and Conservation impact – both sites are part of the Heathland Reunite Project - creating wildlife corridors by expanding and connecting rare heathland habitats.

HGV Lorries will increase through Midhurst in all directions - Chichester, Petworth and Petersfield

Public Rights of Way will be affected

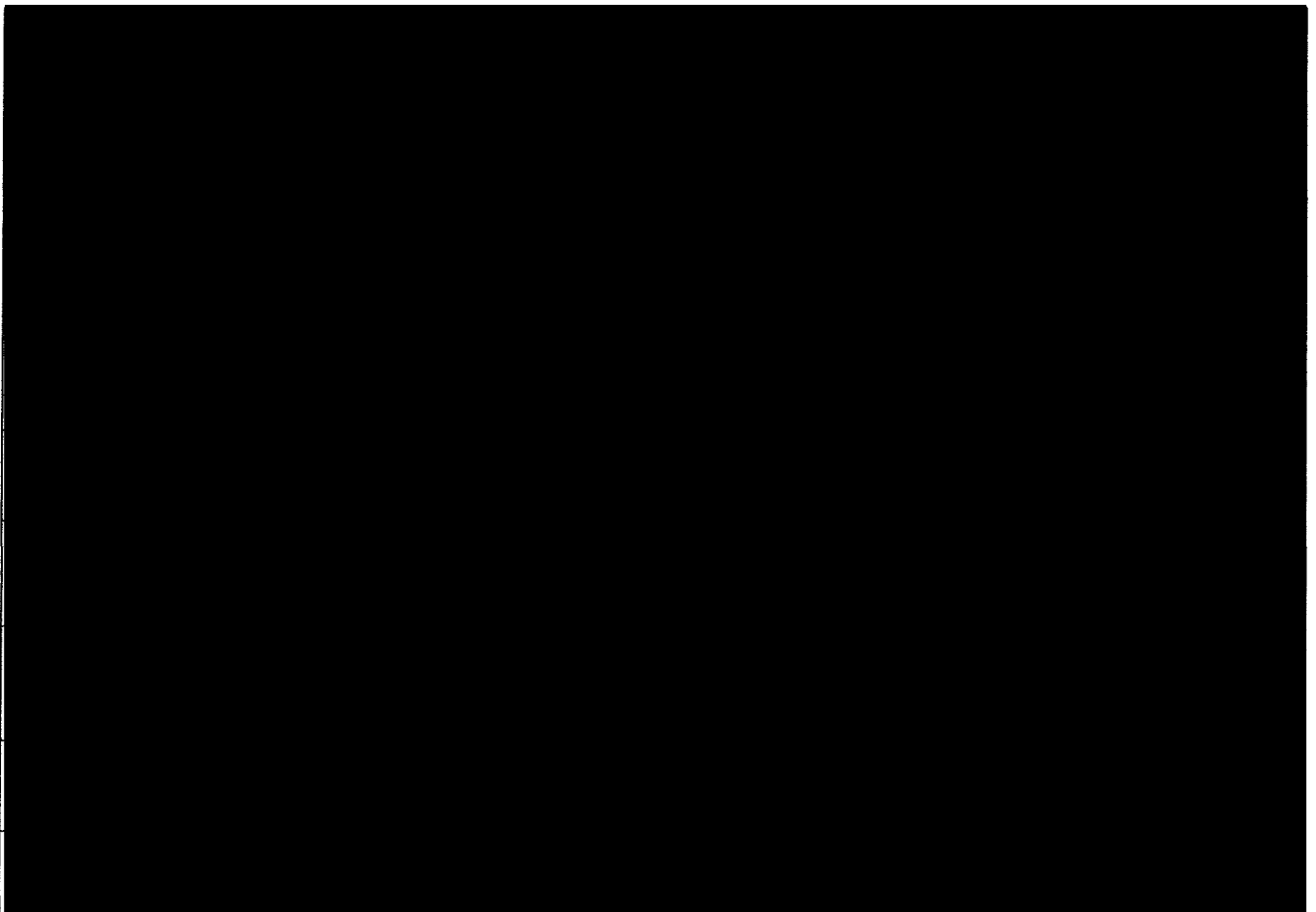
Light Pollution on site and along Severals Road, with similar potential at new road junctions with A272

Air Quality – Midhurst is now an Air Quality Management Area. Rumbolds Hill exceeds EU air quality targets now.

Cumulative impact – INERT lorries back filling at Pendean.

(West Sussex Joint Minerals Local Plan – Single Issue Soft Sand Review – Issues and Options Consultation (Reg. 18) Jan 2019.)

Residents of Heathfield Park, Midhurst.



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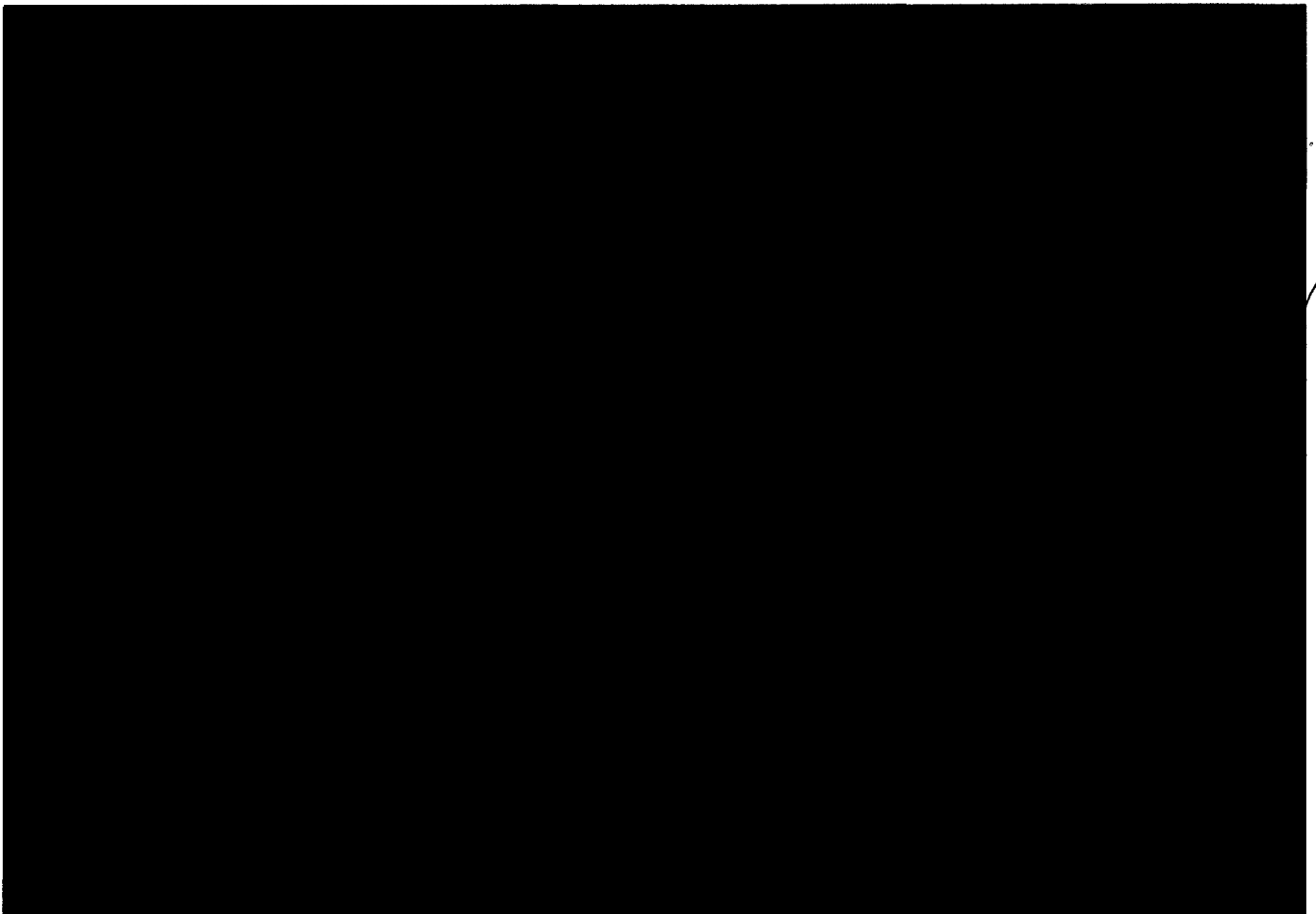
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Residents of Heathfield Park, Midhurst.



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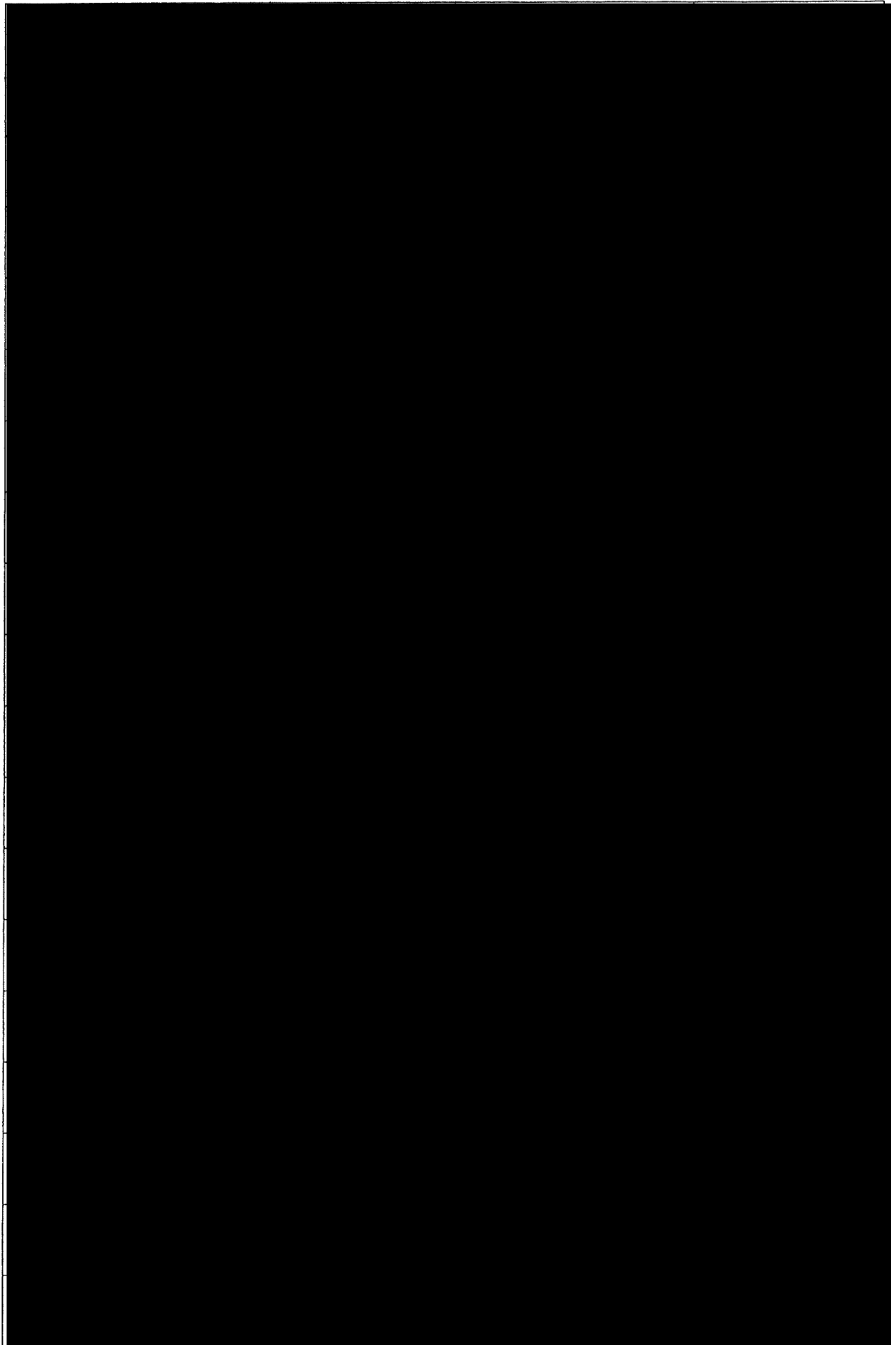
(West Sussex Joint Minerals Local Plan – Single Issue Soft Sand Review – Issues and Options Consultation (Reg. 18) Jan 2019.)

Residents of Heathfield Park, Midhurst.



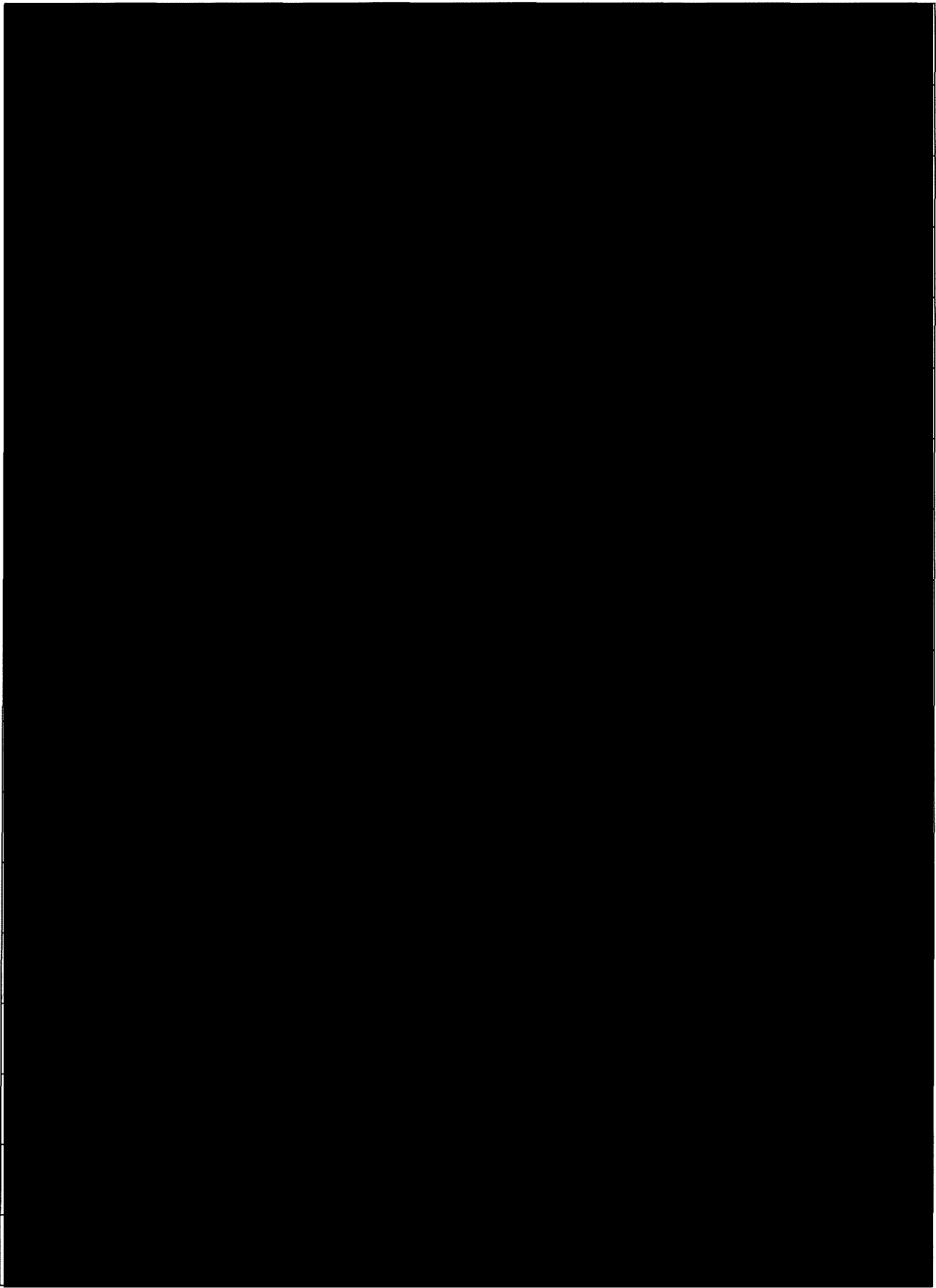
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Residents of Heathfield Park, Midhurst



1/5/11

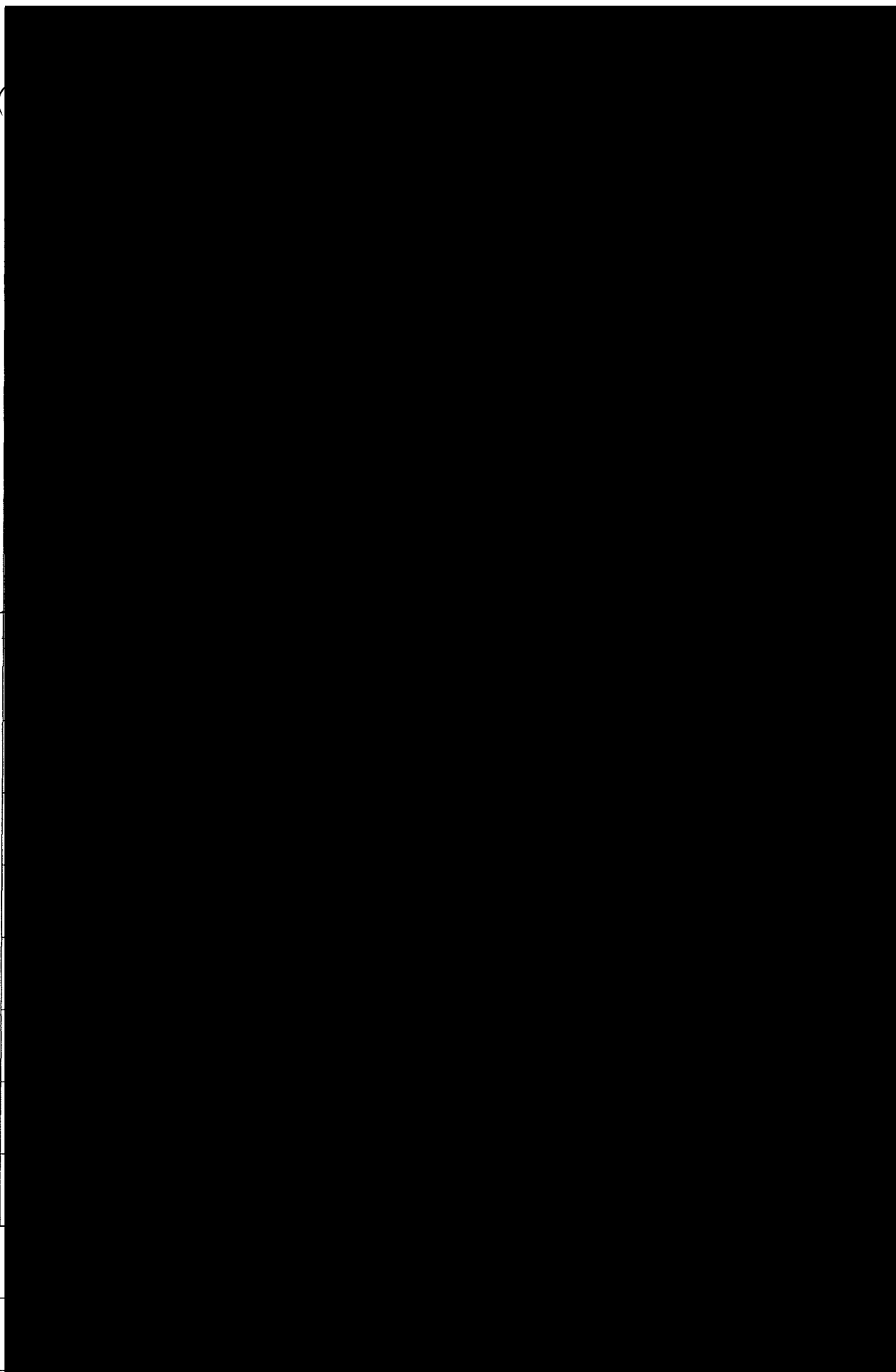
Say No To Cowdray Sand Quarries



1/5

A handwritten signature or mark, possibly initials, is located in the bottom right corner of the page. It consists of several overlapping, curved lines.

Residents of Heathfield Park, Midhurst



**West Sussex Joint Minerals Local Plan
Single Issue Soft Sand Review Issues and Options Consultation (Reg 18) Jan 2019.**

Personal Details:

Contact Address:



Category: Residents

PART B: ISSUE 1

Question 1A: Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

1A-1 House Building – Overestimated Assumption

The issues and Options Consultation (Reg 18) at 2.8 refers to assumptions for the construction of new residential dwellings and a further assumption as to the amount of sand and gravel that maybe used in their construction.

Assumption 1: projects a growth by 26.8% of new houses in West Sussex based on figures produced by the Local Aggregates Assessment (LAA). The lack of data associated with this Assumption makes it very difficult to make any valued judgement.

The LAA provides at Figure B1 *Planned and completed housing in West Sussex (2006/07 – 2033/34)* a chart with a flat line “planned” assessment between 2018 to 2034. There is no evidence to back this assumption.

However, West Sussex Planning Services – *Gross forecast housebuilding on all sites identified at 1st April 2017* provides evidence based data on identified sites within West Sussex and further extrapolates that data for identified sites from 2017 to 2032, a very similar period to that of the JMLP. This predicted data based on identified sites does not represent a 26.8% growth in house building.

No evidence has been provided to support the quoted significant increase in house building of 26.8% over the period of this Plan. Supporting text from Figure B1 above make an unsubstantiated assumption that is driving the demand scenarios for sand. *“that a 26.8% increase in housing completions will occur in West Sussex, which has been factored into the demand scenarios.....”*. Where is the evidence for “will occur”. As soft sand is primarily used in house building if the need has not been established then neither has the demand for sand.

1A-2 Resource Availability

Accurate viable data appears to be missing on the quantity of available sand reserves in existing or permitted quarries. How can you make a valued judgement on continuing need for sand if current figures are unsupported, inaccurate or underestimated?

How can there be a clear and transparent assessment of future need of landwon sand if the data relating to current reserve levels is confidential. This JMLP appears to lean heavily on data and other information provided by the mineral extraction industries without independent verification or means of scrutiny.

The starting point in the LAA for estimating future demand is information on previous sales, how much of those sales include recycled or marine won materials?

The LAA at 2.1.32 states *"The South Downs Soft Sand Study (2012) states that the Crown Estate 'believe that there is potential for marine sources to provide viable 'soft' sand as an alternative to land based quarrying'. There are sources of marine-won aggregate being used, as a replacement, or through blending, to create mortar In 2014, in England and Wales, 1 05mt of marine-won aggregate was used in mortar Of this, 72,000 tonnes was sold in the South East . . ."*

Question 1B: Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

Alternative House Building Practices

The Government recognises that current policies are not driving the required changes *The UK Housing Fit for the Future Committee on Climate Change Feb 2019*: concluded greenhouse gas emission targets would not be met without widespread changes to house construction practices They recommend new policies are developed and implemented to change the way houses are built. More sustainable and cost effective house building practices are being adopted nationwide These new policy changes could have a significant impact on the demand for soft sand during the lifetime of the JMLP

Question 1C: Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/ evidence to support your view.

Yes

As commented on before this document is light on consistent and verifiable data. The quantity in reserve at extraction sites is confidential, so the starting point for the landbank is a guesstimate. The predicted housing numbers are unsubstantiated and the interdependent future need for soft sand is therefore also unknown

JMLP Para 3.19 *"The South East MPAs are working on a Position Statement setting out a joint understanding of the soft sand issue within the South East The Authorities are pursuing Statements of Common Ground with other MPAs, as required by national policy (NPPF Para 27) and guidance, to demonstrate effective cooperation to address the issues around soft sand and explore the potential for supply to the wider market from areas less constrained by designated landscapes, as is the case in West Sussex "*

The aims of this Group are to ensure that the provision of soft sand in the South East of England is co-ordinated, whilst recognising commercial considerations and to ensuring consistency in planning consent between authorities.

The Statement of Common Ground appears to recognise the National importance of not only the designated landscape of West Sussex but in particular those of the SDNP. This agreement should be finalised permitting a holistic approach to both mineral supply and the protection of nationally significant landscapes

Part C: ISSUE 2

Question 2A: Do you consider that all 'reasonable alternatives' for soft sand supply have been identified or are there other options that we should be considering?

This consultation document remains silent on marine-won sand when assessing need and instead leans heavily on landwon sand. These are finite and non-sustainable resources

Promotion of recycled, marine-won and the adoption of alternative house building practices and methods should be factored into these policies

Question 2B: Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

References made throughout this response

Question 2C: Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

The preferred strategy should be **OPTION E**

Option E A combination of

- *Supply from sites within West Sussex but outside of the National Park, currently there are permitted sites supplying soft sand from within West Sussex*
- *Supply from sites within West Sussex, including within the National Park, currently there are historical permitted sites, granted permission before the establishment of the National Park. No new sites should be permitted within the National Park*
- *Option C Supply from areas outside West Sussex; the proliferation of the Statement of Common Ground should be encouraged*
- *Option D: Supply from alternative sources including marine-dredged material; this should be encouraged along with the reduction in construction waste and the consideration of alternative building practices*

Historical extraction sites within West Sussex with permission prior to the establishment of the National Park already supply soft sand Marine-won supplies are used in other regions to replace some soft sand The Statement of Common Ground between south eastern counties should be carried forward

Aims 4.1 This Statement has the following broad aims • To ensure that planned provision for the supply of soft sand in the South East of England is co-ordinated, as far as is possible, whilst recognising that provision by the mineral industry is based on commercial considerations; and • to ensure that the approach to planning for the supply of soft sand is consistent between authorities.

It is worth repeating these are finite and non-sustainable resources Promotion of recycled, marine-won, the reduction of construction waste and the adoption of alternative house building practices and methods should be factored into this review

Part D: ISSUE 3

Question 3: Do you have any comments on the draft Sustainability Appraisal of the Options

As with the majority of this *public* consultation it is almost incomprehensible to the general public To even attempt an answer to this and many other questions the public are asked to wade through a significant number of, in some cases technical documents that are stuffed full of acronyms, jargon and inaccuracies The general public are then asked to critique a document officials have been working on for months if not years

That said I have read through the documents and the errors are numerous. One of the more significant is the omission of one site completely. In the *Sustainability Appraisal including Strategic Environmental Assessment* the Severals West is cited however, the Severals East some 15 feet across the single track road is not mentioned at all see Table 3 Page 17.

Table 3 also has a colouring system not consistent with the traffic light system used elsewhere in the consultation document bundle and the symbols need another table of their own to try and explain their significance. Even with that I still have no idea what a "-?" refers to. The whole thing fails.

My overriding comments on this series of documents are they should be proof read then resubmitted bearing in mind these are public documents and the public may wish to read and understand them.

Sustainability Policy

It is incumbent on local authorities to promote sustainable practices through their policies including those developed for the minerals extraction industries. This demand driven policy where sales dictate the need for extraction does little to preserve a non-sustainable resource or encourage the adoption of construction waste reduction and alternative building practices. It could be better described as the more you sell the more you get philosophy.

Question 4: Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)

The Issues and Options Consultation sets out 5 site selection principles:

- Places where there are opportunities to restore land beneficially.
- 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).
- Sites that have good access to the Lorry Route Network (LRN).
- The need to conserve and, where possible, enhance protected landscapes in the plan area.
- A preference for extensions to existing sites rather than new sites, subject to cumulative impact assessments.

The report and consultation document remains silent on how these principles were applied to each site identified. If you establish selection principles then you should apply them. The results should have formed part of this consultation document or those numerous supporting documents.

I am particularly interested in how the 5 principles were applied to both Severals East and Severals West sites. Where:

1. Extensive and costly habitat improvement has been undertaken in past few years.
2. Both sites are sensitive heathland sites. Heathland has been much depleted over the past few decades and is now considered a rare habitat. Interspersed in and along these sites are domestic dwellings.
3. There is no suitable HGV egress from either of these sites onto the nearest LRN. The estimated 300 lorry movements per day would encounter significant restrictions of road size and suitability to the west and AQMA's to the south and east.
4. No amount of restoration could restore this heathland habitat because the sand is the primary substructure required for this sort of heathland. No sand no heathland.
5. Both these sites would be new sites. There is a high potential for significant cumulative impacts.

Question 5: Do you have any comments on the nine shortlisted sites identified in the Issues and Options Consultation Document?

Yes for Severals West and Severals East Please see attached document that I would like to endorse.

Question 6: Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

Not at this time

Question 7: Are there any sites that we should be considering that are not included in the Soft Sand Site Selection Report (4SR)?

See previous comments – Yes marine-won and sites outside of West Sussex

Question 8: Do you have any comments on the sustainability appraisal of the potential sites?

See question 3

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 sites?

The crux of this question is the exceptional circumstances test This document remains silent on this issue. The MLP Inspector in requiring this review stated at para 5 “there is the potential, in the future, for exceptional circumstances” This makes an unassailable statement that there are no exceptional circumstances existing at this time and therefore mineral development in the SDNP is not acceptable

The exceptional circumstances should be a key requirement before considering mineral extraction in SDNP

For future applications an assessment should be clear and transparent and include the following

- What are the exceptional circumstances criteria?
- How has each site been defined under this criterion?
- How has this test been applied to each site?
- What are the results of the applied test?

Site specific Comments on the Severals West and Severals East sites are attached to this document.

Severals East

		Comments
Restoration options	Potential for heathland and/or broad-leaved woodland restoration with interspersed ponds for nature conservation. Improved public access, linking with Midhurst Common/the Serpent Trail.	<p>Restoration of The Severals to a more natural heathland environment has been underway for a number of years (see detailed comments below). The current landowner has even stated that the work to restore the environment in the area is "one of the biggest conservation orientated projects Cowdray has done" (Ref Cowdray Estate website).</p> <p>For a number of years the SDNP has been promoting the Heathland Reunited, a project supported by 11 organisations to expand and connect the heathland in the national park. The total project value is £2.47 million part of which will be used to create wildlife corridors. The Severals has been an important part of the project. It seems counter productive that there tearing up these areas for a sand quarry is now being considered after the cost and effort put into this project and the obvious importance the SDNP gives this given the publicity. This project even receives a full page in the SDNP monthly newsletter for February 2019.</p> <p>The idea that the site could be restored to anything even remotely recognisable as "natural" with "interspersed ponds" as suggested in the assessment is really quite risible. Particularly given what all local residents have seen of the existing sand extraction site at Minsted. A broad leaved woodland with interspersed ponds is not a natural heathland environment as is currently found across the area and existing conservation efforts have been focused on re-establishing. The purpose of the SDNP should be to maintain and protect the existing environment not manufacture an environment to meet industrial needs.</p> <p>There is already public access linked with Midhurst Common and the Serpent Trail which crosses both Severals East and West so this is not a "restoration" option – it already exists.</p> <p>Very small scale historical quarrying was undertaken on Midhurst Common. Those sites demonstrate what happens when the soil is removed. The ponds and surrounding area are completely dead. Nothing lives in them and there is only sparse vegetation around them. Removing the sand decreases the biodiversity in the soils, destroys the natural seed bank.</p> <p>Any commitment from the regulator on restoration also seems to be completely baseless. We are well aware from the Minsted site that there seems to be very little enforcement capability as that site is in breach of a wide range of conditions, including restoration commitments but as far as we are aware the authorities are unable to take any action. The site continues to sit in limbo with no action taken.</p>
Site		

specific information		
Planning history and current		
Extension to existin	One of two new sites coming forward, lies adjacent to east	
Planning policy	Within Chichester District Rural Policy Area where development is restricted. Note: The Chichester District Council	
Planning history	Site was not allocated in the Minerals Local Plan (2003) or the JMLP (2018). Site was not considered to	

	Key Criteria	RAG Score	Comments/Additional Information
Landscape and visual designations	<p>Within South Downs National Park</p> <p>Landscape Study (LUC, 2011): Whilst the woodland and forest limit intervisibility with the surrounding area to an extent, the site forms a link between Midhurst Common, to the east, and Stedham Common to the west, traversed by dense network of paths and</p>	<p>AMBER</p> <p>The site falls within the boundary of the SDNP and has a Medium-High sensitivity to extraction. The site falls within an area of medium tranquility.</p> <p>Some potential for landscape enhancement at</p>	<p>RED given recent conservation efforts and potential for restoration to natural environment.</p> <p>Since the Landscape Study in 2011, a great deal of money and effort have gone into restoration of the heathland area of Severals East and West. Severals East has had work carried out in partnership with the Friends of Midhurst Common and the SDNP to restore the heathland with a Wildlife Improvement Grant from Chichester District Council.</p> <p>In consultation with the SDNP, the woodland has been cut back on both sides of the Severals Road to establish a wildlife corridor to link Midhurst Common with Stedham and Iping Common which</p>

	<p>bridleways, including The Serpent Trail. The site therefore contributes significantly to the recreational value of the wider area. The potential effects of the development on the areas of ancient woodland, the tranquility and sense of remoteness of the area and the recreational value of the area increase the sensitivity of the site. Although predominantly comprising plantation forest, restricting views into the area and enabling the visual containment of extraction activities within existing tree cover, areas of broadleaf trees reduce the overall capacity of the landscape. The southern part of the site narrows considerably, reducing scope to locate extraction away from sensitive landscape features in adjacent areas of woodland and heathland.</p> <p>The site is considered to have a Medium- High sensitivity and Low-Moderate capacity for mineral extraction.</p> <p>Supplement to WSCC Sensitivity Study 2011 (SDNPA, 2015): The site has a Medium-High sensitivity. Severals East and West both singularly and jointly, would be</p>	<p>the restoration phase.</p>	<p>will be disrupted by the proposed activities</p> <p>In addition, The Cowdray Estate has received grants of up to £4,000 per hectare from the Forestry Commission to clear rhododendron from the area as part of the Cowdray Estates “on-going commitment to preserving and enhancing the local area” A commitment that does not seem in keeping with a sand quarry on the site. The clearing of rhododendron was stated to have a significant impact on The Severals enabling native flora and fauna to re-establish and provide habitats for animals and bird species to include Nightjar and Dartford Warbler. The Cowdray Estate were quoted as saying “Not only has our work enhanced the area, The Severals is now a much nicer place for the public to enjoy walking around ” See sign at end of document.</p> <p>Given the efforts to restore the natural environment over the Severals it seems that restoration of the area is already well underway, and progress is being made to return the area to a “natural” state It would be to take a large step backwards to allow extraction regardless of the later restoration plans.</p> <p>Any restoration would not improve the environment as the sand extraction would significantly alter the site, soils and landscape such that it would no longer be sustainable as heathland</p> <p>The suggestion for landscape enhancement seems to be rather poorly thought through The suggestion of broad-leaved woodland interspersed with ponds is not consistent the the existing or surrounding natural environment (or conservation efforts) and should not even be considered by the SDNP How is that protecting the heathland environment? Has the assessment included a visit to the existing quarry at Minsted to identify how this conclusion is going to be applied to that site?</p> <p>We note that one of the other sites was discounted because it would be visible from a local high point Severals East and West would be very visible from Bepton Down The small cleared area on Midhurst Common adjacent to the site is easily identified from Bepton Down</p> <p>More locally, the view from Sunset Hill looks immediately over the</p>
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	<p>likely to have significant impacts on access and PROW. The existing use of the land for forestry plantation reduces its overall sensitivity on landscape grounds and to some extent how tranquillity is measured as the woodland is not perceived to be 'natural'. For this reason it has been considered that restoration proposals to heathland/woodland mosaic would be beneficial in the long term provided that sufficient areas of the sites can be restored to land rather than wet restoration with the associated water quality issues that this involves.</p>		<p>proposed area – particularly as the Cowdray Estate cleared their commercial forest growth to promote the view. Seemingly, more evidence that the landowner considered this a short time ago to be an enhancement to the community which is now invalid</p>
<p>Nature conservation and geodiversity designations</p>	<p>An SNCI lies to the west and east of the site. Adjacent to Midhurst Common SNCI (east). Stedham Common SNCI 0.7km west. River Rother SNCI 0.3km north. Iping Common SSSI and LNR is located 1km to the west of the site.</p> <p>Area of Ancient Woodland (replanted) partially located within the north of the site, buffer zone would protect from other land uses.</p> <p>Site contains priority habitat of lowland heath and ancient woodland, contains rare species inventory records and is within a Biodiversity Opportunity Area. Impact of changes to water table on heathland needs</p>	<p>RED/AMBER</p> <p>Site contains priority habitat of lowland heath and ancient woodland which would be majorly harmed by mineral extraction and as such high levels of mitigation would be required.</p>	<p>RED given interdependency of local sites and previous designation as a wildlife corridor.</p> <p>The assessment of protected sites is being undertaken on an individual site basis without consideration of the interdependency between and among sites. The Severals area has been identified as an important corridor (see comments above) linking many of these sites but in particular the SNCI's at Midhurst, Stedham and Iping.</p> <p>The Area of Ancient Woodland (replanted) is well within the existing area considered by the assessment so it is not clear how that can act as a buffer zone as it is being considered as part of the potential extraction area</p> <p>See previous comments on mitigation and restoration</p> <p>Severals East and West are identified as an SSSI Impact Risk Zone being just 300m from the Stedham Common SSSI. The Severals Bog is another important site with a unique fauna that will be destroyed by the quarry. The impact of the SSSI on the water table from quarrying is unknown and the impact on underground aquifers in free draining sand with the topography of these sites may change the existent fine balance of heathland ground water</p>

	<p>to be considered.</p> <p>This site lies approximately 6km from Singleton and Cocking Tunnel SAC. There is no scope for adverse impacts on this European site.</p> <p>This site was 'screened in' for Appropriate Assessment as part of a previous Habitat Regulation Assessment carried out in 2011. The initial screening exercise identified that water quality was a pathway requiring consideration due to the potential impact of sediment within close proximity to European designated sites. Concluded that this site will not have any likely significant effects on the Arun Valley SPA/Ramsar through reduced water flows or quality.</p>		<p>retention.</p>
<p>Historic environment designations</p>	<p>Heathbarn farmhouse (grade II listed) to the north east of the indicated site boundary. Grade II listed Toll House located 0.4km away to the north east.</p> <p>There are four Conservation Areas within 2km of the site, Midhurst, Iping, Stedham and Woolbeding.</p>	<p>GREEN/AMBER</p> <p>The site may cause minor harm to the setting of listed buildings, Conservation Areas and archaeological remains. Moderate mitigation measures should be adopted – including the undertaking of a Lidar survey.</p>	<p>AMBER Historical local significance</p> <p>There are a number of ancient sites in the area including the roman road across Stedham Common. Full archaeological studies should be carried out before any quarrying is permitted.</p> <p>The use of the area by the public has been well documented for over 150 years.</p> <p>In the 1868, G.D. Wolferston's <i>A Guide Book to Midhurst</i> describes the Severals as being '<i>...laid out as a kind of pleasure ground, and planted with every description of ornamental tree ... It is inexhaustible in walks</i>'. In the early 1900's the local vicar and philanthropist, The Reverend Frank Tatchell, encouraged people to walk the commons and these woods. There is no better</p>

	<p>Woolbeding Estate and Gardens north east of the site, managed by the National Trust.</p> <p>Early archaeological assessment strongly recommended - as a preliminary to any field evaluation a Lidar survey should be carried out (as this is a wooded site). Evaluation should be undertaken pre-determination and the results made available to consider at the application stage.</p>		<p>evidence for the allure of the Severals in those days than a 1913 Valentine Series postcard This shows a well managed even aged stand of sunlit pines with a smooth needle strewn path wending its way into the distance Centre stage and smiling, is a young family – a mother with her baby in its pram, three small daughters and a dog The scene spells a perfect harmony between forestry and leisure</p> <p>In a study of the social history of Midhurst Common, Jess Mariner of Heath Barn Farm remembered back to his boyhood in the 1930's. During fine weather people would be out on the rides in their Sunday best They would like 'to be seen', walking, talking, meeting and amongst the tall trees – a kind of 'promenading in the forest'</p>
<p>Water environment (including flooding)</p>	<p>Habitat Regulation Assessment 2010/11.</p> <p>Site screened in for Appropriate Assessment: <i>The site lies approximately 6km from Singleton and Cocking Tunnel SAC. There is no scope for adverse impacts on this European site. However, the site does include a watercourse that drains to the river Rother and ultimately into the Arun Valley SPA/Ramsar. There is therefore a potential pathway for sediment impacts so this site has been screened in for further consideration.</i></p> <p>Appropriate Assessment: There are adequate safeguards (dilution and planning conditions) in place to ensure that the site will not have an</p>	<p>AMBER</p> <p>Vulnerable water issues. EA to check.</p> <p>The risk and level of harm would be dependent on the depth of the proposed mineral working (above or below the water table) and the method of working.</p> <p>A phase 1 hydrological and hydrogeological risk assessment should be undertaken before allocation.</p>	<p>RED until further studies of potential impact on Rother and Arun SPA and RAMSAR site completed.</p> <p>Part of the assessment in this section is directed at the identification of local SACs as opposed to the water environment</p> <p><i>Potential impacts of the Rother should be a very high priority that does not seem to have been properly assessed at this stage This is a more significant issue for Severals West than East We would have thought that this should be a RED given the potential impact on an SPA Ramsar site with the potential to be AMBER following a hydrological and hydrogeological risk assessment</i></p> <p>The whole of the area for both Severals East and Severals West is identified by DEFRA as a Drinking Water Safeguard Zone (Surface Water In addition, the northern part of Severals East is a Drinking Water Protected Area (Surface) Water.</p> <p>The impact of changes to the water table from quarrying has not been studied with potential major harm to the sensitive heathland environment, including the neighbouring SSSI and marsh area in the Quag It is understood that the Minsted quarry affected the water table and monitoring wells were installed by the operator The data from these wells has not been made available</p>

	<p>adverse effect on the Arun Valley SPA/Ramsar through reduced water flows or quality.</p> <ul style="list-style-type: none"> • Flood zone 1 • Negligible risk to groundwater flooding • Low risk of surface water flooding • Depth of working and de-watering operations will need to be explored and assessed • No working below groundwater table preferable • Risk Assessment of the water environment (Qualitative Hydrological & Hydrogeological Risk Assessment) - recommend phase 1 prior to allocation • Localised flooding experienced in 2013/14 at Woolbeding Estate and Gardens • Possible Water Framework Directive impacts – drainage to watercourse which drains to Rother to Arun 		
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	<ul style="list-style-type: none"> Any risk of sediment entering the watercourses which lead into the River Rother would need to be fully assessed and mitigated 		
Air quality	<p>Site not located within an Air Quality Management Area but off site traffic movements will need to be considered in the Transport Assessment.</p> <p>Traffic from this site may pass through the AQMA's in Chichester (A27/A286 Stockbridge roundabout, A286- Orchard St and A285- St Pancras).</p> <p>If traffic would have a negative impact on an Air Quality Management Area, then an Air Quality Assessment would also be required</p>	<p>AMBER</p> <p>HGVs may need to pass through a number of AQMAs in Chichester which would have a negative impact on air quality.</p>	<p>RED given potential traffic issues and the future AQMA in Midhurst.</p> <p>The transport assessment also needs to consider potential air quality issues on other routes long the A272 as not all traffic will travel to Chichester There are potential issues to the west at Trotton, Rogate, Petersfield and the A3 corridor as well as towards Midhurst and Petworth to the east.</p> <p>The key area is probably Midhurst as air quality in the Rumbold's Hill area is currently not meeting relevant air quality standards Monitoring is in progress and the expectation is that this will be identified as an AQMA in the very near future</p>
Soil quality	<p>Grade 4 no loss of BMV agricultural land.</p>	<p>GREEN</p> <p>The site contains no BMV agricultural land.</p>	<p>RED sand removal would result in complete destruction of the heathland habitat.</p> <p>This appears to be a rather simplistic conclusion. Soil is not only of agricultural value The sandy soil of the heathland is what makes the area unique and defines the heathland habitat and has been a key criteria for inclusion of the heathland within the national park. To assess the soil in terms of its agricultural quality alone misses the whole point of the park designation Removing the sand also has a significant impact on biodiversity as can be seen from historical quarries in the area which, after decades, have not recovered.</p>
Public rights of way			AMBER

	<p>Public Footpaths 3617 and 3618 run through the northern section of the site. Footpath 921 follows the eastern boundary of the site. Both footpaths 3617 and 921 form part of the Serpent Trail.</p> <p>All existing PROW are to be accommodated on their legal line and not to be disturbed, obstructed or public access deterred until and unless legal diversion or extinguishment (a public path order – PPO) is proposed and legally confirmed.</p> <p>Opportunities to enhance future public access will be pursued by the PROW Teams through any future planning application.</p>	<p>AMBER</p> <p>The site would pose a potential hazard for users of PROW. Planning obligations and mitigation measures may make the site acceptable in terms of PROW.</p>	<p>The area is well established as an important amenity area. As well as the Public footpaths there are a number of footpaths identified as areas with agreed public access across the site. As the site boundary takes up the entire Severals woods this would severely restrict access to quite a large area with few alternatives</p> <p>In addition, the noise from extraction activities would result in a significant impact on the amenity value of the area. Opportunities to improve access would appear to be very limited as currently there is access across the whole site</p> <p>The Serpent Trail is strongly promoted by the SDNPA as “a 64-mile path which winds its way through the rare heathlands of the South Downs National Park.” The enjoyment of this stretch will be significantly harmed</p>
<p>Transport and access</p>	<p>Possible access from Severals Road/A272. Suitability of access road needs to be assessed. The impact of additional HGV traffic on Midhurst and the villages to the west of the site should be suitably considered.</p> <p>High level transport assessment (2011) concluded:</p> <p>Access is possible directly onto the A272. It is recommended that the sites (Severals West and Severals East) are sequentially developed.</p>	<p>AMBER</p> <p>The site poses a moderate risk of causing harm – especially if HGV traffic passes through villages.</p> <p>Risks associated with transport/access may be reduced if Severals West and East are developed sequentially.</p>	<p>RED as safe access to the site for that number of vehicles is not feasible.</p> <p>Access to the Severals Rd is not credible. The Severals Rd is a small single track village lane with restricted access through a sunken lane to the A272</p> <p>Any access to the A272 will be extremely dangerous given the speed and volume of traffic. It is already heavily used by aggregate lorries. On one day recently we came across 6 aggregate lorries between the Severals and Trotton Bridge in the space of less than 10 mins. We suggest you speak with the local farmer at Woolmer Bridge who has difficulty accessing the A272</p> <p>The transport assessment also needs to consider issues on other routes along the A272 as not all traffic will travel to Chichester. There are potential issues to the west at Trotton and Rogate where there is restricted space and similarly at Petworth to the east. Local residents already have fears arising from existing aggregate lorries operated by Inert and Dudman which travel at some speed through the area.</p>

			<p>Recent air quality monitoring has found that the centre of Midhurst is one of the three worst areas for air quality in West Sussex Further monitoring is almost complete but it is expected that some areas will be identified as an AQMA</p> <p>The assessment suggests a sequential development No estimate has been made for how long it will take to work each site but if we look at 4 million tonnes for the two sites and assume 20-30 tonnes per lorry that will be between 130,000 and 200,000 lorry loads Over a 10 year period and assuming 261 working days a year that would be between 50 and 76 per day – double that over a 5 year period. That would be up to 300 lorry movements per day. That is not even remotely feasible for both traffic impact and local air quality.</p>
Services and utilities	To be identified using evidence provided by utility/service providers.	<p>GREEN</p> <p>There are no services or utilities near to, or within the site.</p>	<p>Amber – Severals East is traversed by HT lines overhead which would need to be rerouted causing significant incidental works and disruption. The A272 has main gas transfer pipeline running adjacent to the sites and this may need significant protection from any works access point</p>
Amenity	<p>Severals House and residential properties to the south of the site.</p> <p>Heathbarn Farm and 1 and 2 Severals Cottages lie immediately to the east of the site.</p>	<p>RED/AMBER</p> <p>There are a number of sensitive receptors close to the site who would be subject to high levels of harm.</p> <p>Mitigation measures may enable the site to be workable.</p>	<p>RED</p> <p>Agree that there are a number of sensitive receptors very close to the site and the area is of high importance for amenity use.</p> <p>Heathbarn Farm doesn't lie "immediately" to the east. It is right up against the boundary Similarly the report omits 'The Cottage at the Severals' which abuts the proposed site</p> <p>Furthermore; amenity value of the site(s) is not limited to those properties immediately adjoining the proposals The area is valued for its beauty, scenery and tranquillity as illustrated with the formation of Friends of Midhurst Common (FOMC) being formed to protect this. This group and the work they have done (with the consent and help of the Cowdray Estate and SDNPA) represents the values of a much wider community in the town.</p>
Cumulative impact	<p>There is a history of mineral working in close proximity to the site.</p> <p>Landscape Study (LUC, 2011):</p>	<p>RED/AMBER</p> <p>The site may cause considerable harm due to the site's proximity to other mineral sites.</p>	<p>RED given existing activity in the area and potential for development of multiple sites.</p> <p>Cumulative impact with the proposed joint development with Severals West would be very high if sites were developed simultaneously or separately In addition, the site at Minsted</p>

	With the proximity of the existing extraction site to the northwest, there is potential for cumulative effects on the special qualities of the wider Farmland and Heathland Mosaic character area, with the SDNP.		<p>currently has consent to extract sand until 2041 and although it is currently suspended there is the intention for extraction to start again. If active at that same time as either of the Severals sites or the Minsted extension that is also under consideration in this process then the traffic implications alone would be significant. Lorry traffic from the Minsted site is very noticeable when it is active.</p> <p>Similarly, when active, noise from the Minsted site is a real problem and we have issued complaints in the past. Multiple sites would exacerbate the problem in an area where there is very little baseline noise. Minsted quarry is in default of its plans to restore the site and efforts by the SDNPA to make this happen have been weak. There is little trust in the community that promises will be met by other operators.</p> <p>Cumulative impacts would also result from many of the other issues raised above such as</p> <ul style="list-style-type: none"> • Air Quality • Traffic • Wildlife • Access • Protected heathland
Airport safeguarding	Not applicable	<p>GREEN</p> <p>The site does not fall within an airfield safeguarding zone.</p>	No comment

Key issues/constraints	Additional Comments
The site is located within the SDNP. The site is considered to have a medium to high landscape character sensitivity to extraction, with the areas of ancient woodland and the water course to the west of the site of higher sensitivity. The site has moderate to low	Landscape – there have been significant efforts recently to return the Severals to its natural heathland environment. This has taken considerable cost and effort and it would be short sighted to then undo all of the successful efforts of the past few years.

<p>landscape capacity overall for accommodating mineral extraction.</p> <p>Site contains priority habitat of lowland heath and a small area of ancient woodland. This site was 'screened in' for Appropriate Assessment as part of a previous Habitat Regulation Assessment carried out in 2011. It was concluded that this site will not have any likely significant effects on the Arun Valley SPA/Ramsar through reduced water flows or quality. Further assessment of groundwater issues is required.</p> <p>The site could have a negative impact on a small number of adjacent residential properties. Public Footpaths 3617 and 3618 run through the northern section of the site and would require diversion.</p>	<p>Noise potential noise disruption has not been considered. Particularly if multiple sites are operational.</p> <p>Access/Amenity – it is a significant area for amenity use not limited to the formal Public Rights of Way. The way this assessment is worded, it seems that diversion of footpaths seems to be just assumed as a given.</p>
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Noise

No consideration has been given to noise issues associated with sand extraction. As residents of the area know, existing sand extraction at the Minsted site can be heard well over a mile away. The proximity of the proposed site to housing and amenity areas will result in significant noise impacts over a large area, particularly if multiple sites are given consent. The existing site at Minsted has consent until 2041 although operations are currently suspended due to not meeting some consent conditions.

Wildlife/Plants

The assessment does not appear to address specific wildlife concerns. The South Downs is home to the only heath in the country where you can find all twelve of our native reptiles and amphibians. Including the **Natterjack Toad, Sand Lizard and Adder** (SDNP Website). Other sensitive species present in the SDNP heathland include:

- **Silver studded blue butterfly** which has “undergone a major decline in numbers during recent years, mainly due to heathland habitat restrictions. It can be found in good numbers on sites across the project area. However this butterfly rarely flies any distance, sometimes moving less than 20m in its lifetime” (SDNP website).
- **Nightjars** have also declined in numbers since the 1980's and as noted above, part of the restoration of the heathland already undertaken at the Severals was to encourage nightjar to the area. Anecdotal evidence from locals suggests that this is starting to prove to be successful.
- **Woodlark** also nest in low and open heathland vegetation
- **Badger** setts (Protected in the UK under the Protection of Badgers Act, 1992, and the Wildlife and Countryside Act, 1981) are found throughout the Severals and are followed by some of the local conservation groups. We understand from local badger protection groups that workers on the Severals destroyed a badger sett despite being warned on numerous occasions that it was present and after agreeing not to work in the area. Unfortunately the police investigated but did not prosecute. So we do not hold out much hope of any further measures to protect badgers in the area.

Severals West

		Comments
<p>Restoration options</p>	<p>Potential for heathland and/or broad-leaved woodland restoration with interspersed ponds for nature conservation. Improved public access, linking with Midhurst Common/the Serpent Trail.</p>	<p>Restoration of The Severals to a more natural heathland environment has been underway for a number of years (see detailed comments throughout the document). The current landowner has even stated that the work to restore the environment in the area is "one of the biggest conservation orientated projects Cowdray has done" (Ref Cowdray Estate website).</p> <p>For a number of years the SDNP has been promoting the Heathland Reunited, a project supported by 11 organisations to expand and connect the heathland in the national park. The total project value is £2.47 million part of which will be used to create wildlife corridors. The Severals has been an important part of the project. It seems counterproductive that there tearing up these areas for a sand quarry is now being considered after the cost and effort put into this project and the obvious importance the SDNP gives this given the publicity. This project even receives a full page in the SDNP monthly newsletter for February 2019.</p> <p>The idea that the site could be restored to anything even remotely recognisable as "natural" with "interspersed ponds" as suggested in the assessment is really quite risible. Particularly given what all local residents have seen of the existing sand extraction site at Minsted. A broad-leaved woodland with interspersed ponds is not a natural heathland environment as is currently found across the area and existing conservation efforts have been focused on re-establishing. The purpose of the SDNP should be to maintain and protect the existing environment not manufacture an environment to meet industrial needs.</p> <p>There is already public access linked with Midhurst Common and the Serpent Trail which crosses both Severals East and West so this is not a "restoration" option – it already exists. Very small-scale historical quarrying was undertaken on Midhurst Common. Those sites demonstrate what happens when the soil is removed. The ponds and surrounding area are completely dead. Nothing lives in them and there is only sparse vegetation around them. Removing the sand decreases the biodiversity in the soils, destroys the natural seed bank and makes recovery impossible.</p> <p>Any commitment from the regulator on restoration also seems to be completely baseless. We are well aware from the Minsted site that there seems to be very little enforcement capability as that site is in breach of a wide range of conditions, including restoration commitments but as far as we are aware the authorities are unable to take any action. The site continues to sit in limbo with no action taken.</p>

Site specific information		
Planning history and		
Extension to existin	One of two sites assesses	
Planning policy	is subject to Chichester District Rural Policy Area where	
Planning history	development. Site was not allocated in the JMLP (2018) or the Minerals Local Plan (2003). Site	

was not considered

	Key Criteria	RAG Score	Comments/Additional Information
Landscape and visual designations	<p>Within South Downs National Park</p> <p>Landscape Study (LUC, 2011): Although comprising large areas of plantation forest, restricting views into the area and enabling the visual containment of extraction activities within existing tree cover, the site has areas of ancient woodland which</p>	<p>Red/Amber</p> <p>Within the South Downs National Park</p> <p>Medium-high landscape sensitivity and a low-moderate capacity for accommodating mineral extraction.</p>	<p>RED given recent conservation efforts and potential for restoration to natural environment.</p> <p>Since the Landscape Study in 2011, a great deal of money and effort have gone into restoration of the heathland area of Severals East and West. Severals East has had work carried out in partnership with the Friends of Midhurst Common and the SDNP to restore the heathland with a Wildlife Improvement Grant from Chichester District Council.</p> <p>In consultation with the SDNP, the woodland has been cut back on both sides of the Severals Road to establish a wildlife</p>

	<p>reduces the overall capacity of the landscape to accommodate development of this nature without adverse impacts on the habitat value and tranquil character of the area. Whilst the woodland and forestry limit inter-visibility with the surrounding area to an extent, the site forms a link between Midhurst Common, to the east, and the Steadham Common to the west, traversed by dense network of paths and bridleways, including the Serpent Trail. The site therefore contributes significantly to the recreational value of the wider area.</p> <p>The site is considered to have a Medium-High sensitivity and Low-Moderate capacity to extraction.</p> <p>Supplement to WSCC Sensitivity Study 2011 (SDNPA, 2015): The site has a Medium-High sensitivity. Severals East and West are together be likely to have significant impacts on access and PROW. The existing use of the land for forestry plantation reduces its overall sensitivity on landscape grounds and to some extent how tranquillity is measured as the woodland is not perceived to be 'natural'. For this reason it has been considered that</p>	<p>Potential for enhancement to heathland/woodland mosaic.</p>	<p>corridor to link Midhurst Common with Stedham and Iping Common which will be disrupted by the proposed activities.</p> <p>In addition, The Cowdray Estate has received grants of up to £4,000 per hectare (75 hectares s up to £300,000) from the Forestry Commission to clear rhododendron from the area as part of the Cowdray Estates "ongoing commitment to preserving and enhancing the local area". A commitment that does not seem in keeping with a sand quarry on the site. The clearing of rhododendron was stated to have a significant impact on The Severals enabling native flora and fauna to re-establish and provide habitats for animals and bird species to include Nightjar and Dartford Warbler. The Cowdray Estate were quoted as saying "Not only has our work enhanced the area, The Severals is now a much nicer place for the public to enjoy walking around." See figure on last page of document.</p> <p>Given the efforts to restore the natural environment over the Severals it seems that restoration of the area is already well underway and progress is being made to return the area to a "natural" state. It would be to take a large step backwards to allow extraction regardless of the later restoration plans.</p> <p>Any restoration would not improve the environment as the sand extraction would significantly alter the site, soils and landscape such that it would no longer be sustainable as heathland.</p> <p>The suggestion for landscape enhancement seems to be rather poorly thought through. The suggestion of broad-leaved woodland interspersed with ponds is not consistent the existing or surrounding natural environment (or conservation efforts) and should not even be considered by the SDNP. How is that protecting the heathland environment? Has the assessment included a visit to the existing quarry at Minsted to identify how this conclusion is going to be applied to that site?</p> <p>We note that one of the other sites was discounted because it would be visible from a local high point. Severals East and West</p>
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	<p>restoration proposals to heathland/woodland mosaic would be beneficial in the long term provided that sufficient areas of the sites can be restored to land rather than wet restoration with the associated water quality issues that this involves.</p>		<p>would be very visible from Bepton Down. The small cleared area on Midhurst Common adjacent to the site is easily identified from Bepton Down.</p> <p>More locally; the view from Sunset Hill looks immediately over the proposed area – particularly as the Cowdray Estate cleared their commercial forest growth to promote the view. Seemingly, more evidence that the landowner considered this a short time ago to be an enhancement to the community which is now invalid.</p>
<p>Nature conservation and geodiversity designations</p>	<p>Severals Bog SNCI(SNC105) is situated within the site along the western edge. Even with a buffer strip, the bog habitat could be vulnerable to local changes in hydrology as a result of mineral working.</p> <p>Quaggs Corner SNCI(SNCIC53) lies to the west of this site.</p> <p>The stream to the west, Severals Stream, is a tributary of the River Rother. Buffers may be required to the stream and SNCIs.</p> <p>Area of Ancient Woodland (replanted) located within the north/northwest of the site.</p> <p>Potential hydrological impacts. Any risk of sediment entering the watercourses which lead into the River Rother would need to be fully assessed and mitigated.</p>	<p>Red/Amber</p> <p>The Several Bog SNCI falls within the boundary of the site and may be negatively affected by the development of the site.</p> <p>High levels of mitigation may be needed to protect the SNCI and the SAC from harm.</p>	<p>RED given interdependency of local sites and previous designation as a wildlife corridor.</p> <p>The assessment of protected sites is being undertaken on an individual site basis without consideration of the interdependency between and among sites. The Severals area has been identified as an important corridor (see comments above) linking many of these sites but in particular the SNCI's at Midhurst, Stedham and Iping.</p> <p>The Area of Ancient Woodland (replanted) is well within the existing area considered by the assessment so it is not clear how that can act as a buffer zone as it is being considered as part of the potential extraction area.</p> <p>See previous comments on mitigation and restoration.</p> <p>Severals East and West are identified as an SSSI Impact Risk Zone.</p> <p>The assessment suggests sediment loading in watercourses will be controlled by planning conditions but we note that a whole series of planning conditions have been breached at the Minsted quarry and nothing has been done other than to cease extraction. Basically it does not appear that the conditions are very enforceable. One of the conditions that has been breached is the need to commence restoration on the areas of the site not in use but there has been no movement on this and no penalty. So we do not think suggesting anything will be controlled by conditions is acceptable.</p>

HRA 2011:

The site lies approximately 6km from Singleton and Cocking Tunnel SAC. There is no scope for adverse impacts on this European site. However, the site includes a watercourse that drains to the river Rother and ultimately into the Arun Valley SPA/Ramsar. There is therefore a potential pathway for sediment impacts so the site has been 'screened in' for Appropriate Assessment.

The screening exercise identified that water quality was a pathway requiring consideration due to the potential impact of sediment within close proximity to European designated sites. It was concluded that this site will not have any likely significant effects on the Arun Valley SPA/Ramsar through reduced water flows or quality as the main channel of the River Arun does not form part of the SPA/Ramsar. As such any increase in sediment that might arise from dewatering associated with this minerals site would be subject to such a scale of dilution that its effect on the SPA/Ramsar site would be negligible, particularly since the main channel of the River Arun does not form part of the SPA/Ramsar site.

	<p>Habitats Regulations Assessment (2015):</p> <p>The HRA (2015) supported the findings of the 2011 assessment.</p> <p>It also noted that sediment loading in watercourses near the site will be controlled by conditions since it is an offence to pollute surface watercourses irrespective of whether they drain to a European site or not. The HRA(2015) concluded that the site will not have any likely effects on the Arun Valley SPA/Ramsar through reduced water flows or quality.</p>		
<p>Historic environment designations</p>	<p>There are a number of listed buildings located within 1km of the site. The closest is 'Badgers', Quags Corner located approximately 0.3km to the west of the site.</p> <p>Woodlands Cottage and Heathbarn farm are also located 0.4 km from the site.</p> <p>There are four Conservation Areas within 2km of the site, Midhurst, Iping, Stedham and Woolbeding.</p> <p>An early archaeological assessment is strongly recommended - as a preliminary to any field evaluation a Lidar survey should be carried out (as this is a wooded site).</p>	<p>Green/Amber</p> <p>The development of the site may cause minor harm to nearby listed buildings, Conservation Areas and archaeological remains in the absence of low level mitigation.</p>	<p>AMBER Historical local significance</p> <p>It is not a designation as such but the use of the area by the public has been well documented for over 150 years.</p> <p>In the 1868, G.D. Wolferston's <i>A Guide Book to Midhurst</i> describes the Severals as being '<i>...laid out as a kind of pleasure ground, and planted with every description of ornamental tree ... It is inexhaustible in walks</i>'. In the early 1900's the local vicar and philanthropist, The Reverend Frank Tatchell, encouraged people to walk the commons and these woods. There is no better evidence for the allure of the Severals in those days than a 1913 Valentine Series postcard. This shows a well managed even aged stand of sunlit pines with a smooth needle strewn path wending its way into the distance. Centre stage and smiling, is a young family – a mother with her baby in its pram, three small daughters and a dog. The scene spells a perfect harmony between forestry and leisure.</p> <p>In a study of the social history of Midhurst Common, Jess Mariner of Heath Barn Farm remembered back to his boyhood in the 1930's. During fine weather people would be out on the rides in their Sunday best. They would like 'to be seen', walking, talking, meeting and amongst the tall trees – a kind of</p>

	Evaluation should be undertaken pre- determination and the results made available to consider at the application stage.		'promenading in the forest'.
Water environment (including flooding)	<p>Habitat Regulation Assessment 2010/11:</p> <p>Site screened in for Appropriate Assessment: The site lies approximately 6km from Singleton and Cocking Tunnel SAC. There is no scope for adverse impacts on this European site. However, the site does include a watercourse that drains to the river Rother and ultimately into the Arun Valley SPA/Ramsar. There is therefore a potential pathway for sediment impacts so this site has been screened in for further consideration.</p> <p>Appropriate Assessment: Due to the effects of dilution the effect of Severals West on the SPA/Ramsar site would be negligible, particularly as the main channel of the River Arun does not form part of the SPA/Ramsar site. Secondly, it is assumed that sediment loading in watercourses near the site will be controlled by conditions since it is an offence to pollute surface watercourses.</p>	<p>Red/Amber</p> <p>The site is near vulnerable water bodies (Severals Bog SNCI) which could be majorly impacted in the absence of a high level of mitigation.</p> <p>A Hydrological Risk Assessment would be required prior to allocation.</p>	<p>RED until further studies of potential impact on Rother and Arun SPA and RAMSAR site completed.</p> <p>Part of the assessment in this section is directed at the identification of local SACs as opposed to the water environment.</p> <p>Potential impacts of the Rother should be a very high priority that does not seem to have been properly assessed at this stage. This is a more significant issue for Severals West than East. We would have thought that this should be a RED given the potential impact on an SPA Ramsar site with the potential to be AMBER following a hydrological and hydrogeological risk assessment.</p> <p>This last line of the key constraints refers to the</p> <p><i>SFRA Update and Sequential Test of Mineral Sites September 2016: Development is appropriate as explained in the "Nature conservation and geodiversity designations" section of this document.</i></p> <p>We note that this document is not available and should be made available if it is to be include in a public consultation.</p> <p>The whole of the area for both Severals East and Severals West is identified by DEFRA as a Drinking Water Safeguard Zone (Surface) Water.</p>

- Flood zone 1(Site borders
Flood zone 2/3)
- Under climate change scenarios (updated February 2016), there is a 50% chance that the western edge of the site could fall within FZ2/3 as river levels could rise by between 10% and 40% during the three time periods (2020s, 2050s and 2080s)
- Under climate change scenarios (updated February 2016), the adjacent river could rise by between 5% and 40% during the three time periods (2020s, 2050s and 2080s) due to peak rainfall allowances
- Negligible risk to groundwater flooding (25% at higher risk)
- Low risk of surface water flooding (5% at higher risk)
- Groundwater levels likely to be high. Depth of working and de-watering operations will need to be explored and assessed. Would

	<p>prefer no working below groundwater table.</p> <ul style="list-style-type: none"> • Possible Water Framework Directive impacts – drainage to watercourse which drains to Rother to Arun <p>Risk Assessment of the water environment (Qualitative Hydrological & Hydrogeological Risk Assessment) - recommend phase 1 assessment prior to allocation.</p> <p>SFRA Update and Sequential Test of Mineral Sites September 2016: Development is appropriate as explained in the "Nature conservation and geodiversity designations" section of this document.</p> <p>Negligible risk of ground water flooding. Low risk of surface water flooding.</p>		
<p>Air quality</p>	<p>Site not located within an Air Quality Management Area but off site traffic movements will need to be considered in the Transport Assessment.</p> <p>Traffic from this site may pass through the AQMAs in Chichester (A27/A286 Stockbridge roundabout, A286- Orchard St and A285- St Pancras).</p>	<p>Amber HGVS movements may impact upon AQMAs located in Chichester.</p>	<p>RED given potential traffic issues and the future AQMA in Midhurst.</p> <p>The transport assessment also needs to consider potential air quality issues on other routes along the A272 as not all traffic will travel to Chichester. There are potential issues to the west at Trotton, Rogate, Petersfield and the A3 corridor as well as towards Midhurst and Petworth to the east.</p> <p>The key area is Midhurst as air quality in the Rumbold's Hill area is currently not meeting relevant air quality standards. Monitoring is in progress and the expectation is that this will be identified as an AQMA in the very near future.</p>

	If traffic would have a negative impact on an Air Quality Management Area, then an Air Quality Assessment would also be required		
Soil quality	Mainly Grade 4 therefore no significant loss of BMV agricultural land (although the site also contains a small area of Grade 2 and Grade 3 agricultural land).	Green The site contains low quality soil.	RED sand removal would result in complete destruction of the heathland habitat. The assessment cannot simply be based on agricultural value. This appears to be a rather simplistic conclusion. Soil is not only of agricultural value. The sandy soil of the heathland is what makes the area unique and defines the heathland habitat and has been a key criteria for inclusion of the heathland within the national park. To assess the soil in terms of its agricultural quality alone misses the whole point of the park designation. Removing the sand also has a significant impact on biodiversity as can be seen from historical quarries in the area which, after decades, have not recovered.
Public rights of way	Footpath 3619 loosely follows the western boundary of the site before turning eastwards along the southern boundary. A number of permissive paths run through the site, one of which forms part of the Serpent Trail. Existing PROW recorded immediately adjacent to any site are to remain accommodated on their legal line and are not to be disturbed, obstructed or public access deterred. Where it is proposed that material is to be extracted or deposited adjacent to these paths, such works are not to be undertaken within 20 metres of the PROW in order that there will be no future subsidence or slippage to cause the PROW to fall away, or spread of material to cause deposition	Amber The site contains permissive footpaths and a number of footpaths close to the boundary of the site. Mitigation measures such as a stand-off between the extraction area and the footpaths may be needed.	RED – limited access to an historical area for public access The area is well established as an important amenity area. As well as the Public footpaths there are a number of footpaths identified as areas with agreed public access across the site. As the site boundary takes up the entire Severals woods this would severely restrict access to quite a large area with few alternatives. In addition, the noise from extraction activities would result in a significant impact on the amenity value of the area. Opportunities to improve access would appear to be very limited as currently there is access across the whole site.

	<p>on the PROW.</p> <p>Opportunities to enhance future public access will be pursued by the PROW Teams through any future planning application</p>		
<p>Transport and access</p>	<p>Transport assessment 2015:</p> <p>The overall acceptability of the site is currently assessed as Low/Medium</p> <p>Access to the site via Severals Road is inappropriate for HGV traffic due to the narrow width, steep gradient and road alignment.</p> <p>Alternative access arrangements include:</p> <ul style="list-style-type: none"> - Direct access onto the A272 (this may be difficult to achieve due to level differences between the site and the road and a road safety audit would be required), - Access via lane crossing Woolmer Bridge. Road would require widening and resurfacing. <p>Further detailed analysis would be needed to conclude which access arrangement is the most suitable.</p> <p>The results of the cumulative impact of the development of all</p>	<p>Amber</p> <p>The site poses a moderate risk of causing harm – and would be dependent on which access arrangement is used.</p>	<p>RED as safe access to the site for that number of vehicles is not feasible.</p> <p>Access to the Severals Rd is not credible. The Severlas Rd is a small single track village lane with restricted access through a sunken lane to the A272.</p> <p>Any access to the A272 will be extremely dangerous given the speed and volume of traffic.</p> <p>The transport assessment also needs to consider issues on other routes long the A272 as not all traffic will travel to Chichester. There are potential issues to the west at Trotton and Rogate where there is restricted space and similarly at Petworth to the east. Local residents already have fears arising from existing aggregate lorries operated by Inert and Dudman which travel at some speed through the area.</p> <p>Recent air quality monitoring has found that the centre of Midhurst is one of the three worst areas for air quality in West Sussex. Further monitoring is almost complete but it is expected that some areas will be identified as an AQMA.</p> <p>The assessment suggests a sequential development. No estimate has been made for how long it will take to work each site but if we look at 4 million tonnes for the two sites and assume 20-30 tonnes per lorry that will be between 130,000 and 200,000 lorry loads. Over a 10 year period and assuming 261 working days a year that would be between 51 and 76 lorries per day – double that over a 5 year period. That would be up to 300 lorry movements per day. That is not even remotely feasible for both traffic impact and local air quality.</p>

	three sites (Severals West, East of West Heath Common and Minsted West) on the A272 is not expected to be severe.		
Services and utilities	To be identified using evidence provided by utility/service providers	Green Based on the information currently available- there are no services or utilities near to, or within the site.	No comment
Amenity	Severals House is located to the east of the site along Severals Road and residential properties to the south of the site.	Red/Amber The site is in close proximity to residential properties and as such the site may cause disturbance (noise, dust and light) to local residents. Mitigation measures should be adopted to reduce the risk of harm.	RED/RED To suggest that mitigation measures can be introduced to reduce the impacts on Severals House is rather absurd. Severals House would be an island surrounded by an area designated for sand extraction. There is no possible mitigation for the impact that would cause.
Cumulative impact	There is a history of mineral working in close proximity to the site. Landscape Study (LUC, 2011): With the proximity of the existing extraction site to the northwest, there is potential for cumulative effects on the special qualities of the wider Wealden Farmland and Heathland Mosaic character area	Red/Amber The site may cause considerable harm due to its proximity to other developments (Minsted quarry). For this reason it may be necessary to delay mineral working at the site until other	RED given existing activity in the area and potential for development of multiple sites. Cumulative impact with the proposed joint development with Severals West would be very high if sites were developed simultaneously or separately. In addition, the site at Minsted currently has consent to extract sand until 2041 and although it is currently suspended there is the intention for extraction to start again. If active at that same time as either of the Severals sites or the Minsted extension that is also under consideration in this process then the traffic implications alone would be significant. Lorry traffic from the Minsted site is very noticeable when it is

	within the SDNP.	sites in the area are completed.	active. Similarly when active, noise from the Minsted site is a real problem and we have issued complaints in the past. Multiple sites would exacerbate the problem in an area where there is very little baseline noise. Cumulative impacts would also result from many of the other issues raised above.
Airport safeguarding	Not applicable	Green The site is not within an Airport Safeguarding Zone.	No comment

Key Issues/ Constraints	Comments
<ul style="list-style-type: none"> • The site is located within the SDNP. • The overall acceptability of the site in terms of access and transport is assessed as Low/Medium (Transport Assessment 2015). • Medium-high landscape sensitivity and a low-moderate capacity for mineral extraction. • The site is likely to have significant impacts on access and PROW. The existing use of the land for forestry plantation reduces its overall sensitivity on landscape grounds and to some extent how tranquillity is measured as the woodland is not perceived to be 'natural'. For this reason it has been considered that restoration proposals to heathland/woodland mosaic would 	<p>Landscape – there have been significant efforts recently to return the Severals to its natural heathland environment. This has taken considerable cost and effort and it would be short sighted to then undo all of the successful efforts of the past few years</p> <p>Noise potential noise disruption has not been considered. Particularly if multiple sites are operational.</p> <p>Access/Amenity – it is a significant area for amenity use not limited to the formal Public Rights of Way. The way this assessment is worded, it seems that diversion of footpaths seems to be just assumed as a given.</p> <p>Severals House – the impact on Severals House would be severe and completely unavoidable. The assessment suggests it “<u>could</u> have a negative impact”. It definitely will have a large negative impact.</p>

be beneficial in the long term provided that a sufficient area of the site can be restored to land rather than wet restoration with the associated water quality issues that this involves. The site contains Severals Bog SNCI(SNCWeC105) along the western edge. Even with a buffer strip, the bog habitat could be vulnerable to local changes in hydrology as a result of mineral working. Further assessment of groundwater issues is required.

The site could have a negative impact on a small number of adjacent residential properties.

Other issues

Noise

No consideration has been given to noise issues associated with sand extraction. As residents of the area know, existing sand extraction at the Minsted site can be heard well over a mile away. The proximity of the proposed site to housing and amenity areas will result in significant noise impacts over a large area, particularly if multiple sites are given consent. The existing site at Minsted has consent until 2041 although operations are currently suspended due to not meeting some consent conditions.

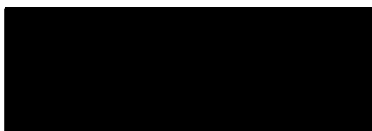
Wildlife/Vegetation

The assessment does not appear to address specific wildlife concerns. The South Downs is home to the only heath in the country where you can find all twelve of our native reptiles and amphibians. Including the **Natterjack Toad, Sand Lizard and Adder** (SDNP Website). Other sensitive species present in the SDNP heathland include

- **Silver studded blue butterfly** which has “undergone a major decline in numbers during recent years, mainly due to heathland habitat restrictions. It can be found in good numbers on sites across the project area. However this butterfly rarely flies any distance, sometimes moving less than 20m in its lifetime” (SDNP website)
- **Nightjars** have also declined in numbers since the 1980’s and as noted above, part of the restoration of the heathland already undertaken at the Severals was to encourage nightjar to the area. Anecdotal evidence from locals suggests that this is starting to prove to be successful.
- **Woodlark** also nest in low and open heathland vegetation.
- **Badger** setts (protected in the UK under the Protection of Badgers Act, 1992, and the Wildlife and Countryside Act, 1981) are found throughout the Severals and are followed by some of the local conservation groups. We understand from local badger protection groups that workers on the Severals destroyed a badger sett despite being warned on numerous occasions that it was present and after agreeing not to work in the area. Unfortunately the police investigated but did not

prosecute So we do not hold out much hope of any further measures to protect badgers in the area.

- **Raven** have been breeding in the Severals and they were extinct in Sussex for over a century
- Scarce bog plants - Marsh Valerian, Marsh Violet, Round leaved Water Crowfoot, Bog Pondweed, White Sedge and the fungus Bog Beacon

West Sussex Soft Sand Review: Issues and Options -Consultation Response**Personal Details Severals Against Cowdray Quarries****Client Details Not Applicable****Contact Address****Categories Local Residents Group****Summary of Key Points of Response**

Our local residents' group is extremely angry that the potential for quarrying in the Severals woods has been reopened after only a few years. The reasons it was originally ruled out have not changed. The suggestion that quarrying be allowed at Severals East and West is ill conceived given the local sensitivities. Some of these points are summarised below.

- **The Severals is a heathland habitat, one of the reasons for the designation of the national park and yet makes up only 1% of the park area. Over 80% of the rare lowland heathland has been lost since the early 1800s.**
- **Large amounts of money have been spent to restore and improve the Severals heathland (estimated to be £300,000 to Cowdray Estate and £2.47 million to Heathlands Reunited). The heathland is the key habitat that was the reason for including the area in the National Park.**
- **Removing the sand destroys the heath. It cannot be restored and the suggestion in the assessment that restoration to an area of broad-leaved woodland interspersed with ponds is a completely absurd suggestion making a fake habitat that does not fit within this heathland corridor and the SDNP Heathland Reunited programme. We also know from nearby Minsted and Cocking (on Cowdray Estate land) that the government agencies appear to have no authority to enforce breaches of planning consent such as a failure to implement restoration plans.**
- **The assessment of protected sites is being undertaken on an individual site basis without consideration of the interdependency between and among sites. The Severals area has been identified as an important corridor linking many of these sites but in particular the SNCI's at Midhurst, Stedham and Iping with those to the east at Ambersham and Graffham.**
- **Severals East and West have been used as an amenity area by the people of Midhurst for over 150 years as documented in books written on the history of Midhurst.**
- **The assessment has not included consideration of impacts on the water table, one of the key problems identified from activities at the nearby Minsted quarry.**
- **We have estimated that sand extraction will require at least 100 to 150 lorries per day over a 5 year period and 50 to 75 lorries per day over a 10 year period. That would be around 300 lorry movements per day. The local roads cannot take this additional load. There are already large numbers of aggregate lorries using the A272. Comments from other parties to our group suggest that this may be a gross underestimate and lorry movements may be more than double those we have estimated.**
- **Midhurst is about to be designated as an AQMA given the poor air quality. As an AQMA, plans must be put in place to improve air quality. This number of vehicles will result in even worse air quality and make any efforts to improve air quality futile. To get south to the A272 would require passing through an AQMA at Chichester and there are very narrow roads through Trotton and Rogate to the west.**

- The Several is home to a wide range of rare and protected wildlife and plants such as Nightjars, Dartford Warbler, Smooth Snake, Adder and Sand Lizard. There has been particular recent emphasis on improving the habitat and transit corridors for these species.
- No consideration has been given to noise impacts. When the sand quarry at Minsted is operating noise can be heard more than 2 miles away.
- Designation of 'Dark Sky' status for this region may also be impacted by vehicle, plant and associated road infrastructure development necessary for the process – particular on the A272.
- The assessment suggests that impacts on local housing (specifically Several House) could be mitigated. This illustrates the lack of thought put into this process. The identified areas completely surround the property boundaries of Several House. If this continues, Several House and others will be severely impacted and no mitigation will be sufficient.
- Quarries at these sites would be clearly visible from a number of locations along the South Downs Way – between Treyford and Bepton Down.

The Soft Sand Review has failed to demonstrate demand or adequately assess existing sand resources. In addition, there is no demonstration of the exceptional circumstances required for mineral extraction within a National Park. Given this, and the conclusions of the MLP Inspector that exceptional circumstances do not exist at present, further investigation needs to focus on potential marine and other reserves and there is sufficient time to do this if exceptional circumstances were to arise in the future. As this is a National Park, further discussion has to look at the conclusion that West Sussex must continue to export to other counties but is restricted from importing sand from other areas.

- Guidance on preparation of Local Area Assessments is issued by the Mineral Products Association which seems like a conflict of interest.
- There is no evidence to support a 26% increase in new house building which drives the subsequent demand.
- Similarly, the resource availability estimates are not supported by facts (e.g. proper reserve estimates for existing sites) and do not even include all the existing quarries present in West Sussex so estimates of available reserves are incorrect, inaccurate and underestimated.
- The MLP Inspector's report seems to be based on the fact that any requirements for soft sand from within West Sussex have to be sourced from West Sussex and the county could not rely on imports from other counties to make up the estimated shortfall. At the same time, he concluded that West Sussex must continue existing exports to other counties. These exports would probably add up to the shortfall identified even with the overestimated demand. It seems counter intuitive and unfair to continue exports but refuse imports.
- This is a National Park. It was defined as such because it was felt that the area should be set aside for the nation. To then try to limit sand reserves to within the park to support West Sussex alone seems to be completely in conflict with the purpose of national park designation.
- As a National Park, mineral development should only be allowed in exceptional circumstances. We have seen no evidence that exceptional circumstances have been demonstrated. Even the MLP Inspector concluded that exceptional circumstances do not exist now but may exist in the future. What might happen in the future does not seem to be an effective basis for policy.
- Marine sands seem to have been ruled out with very little consideration. The fact that marine soft sands are used throughout the UK but not in the southeast seems to have been completely accepted and glossed over. There is obviously not technical reason why marine soft sands cannot be used if they are used elsewhere in the country.

Details on all of these points are provided below.

PART B: ISSUE 1

Question 1A: Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

1A-1 House Building Forecast Overestimated

The demand scenarios are completely unrealistic and not based on facts. The scenarios predict a 26% increase in new house building which is based on potential sites identified from local plans. We have been unable to find any statistics or forecasts for actual or predicted new house building starts that come anywhere near this growth rate.

Long term local forecasts are difficult to find but the Office for Budget Responsibility forecasts predict no increase in new house building nationally until 2023. In 2014 the Department for Communities and Local Government forecast house building in England would remain steady at 210,000 per year until 2039. A recent report showed growth from 2016-17 to 2017-18 to be only 2%. Although 2017 was supposed to be a very good year with new builds in England up 13% forecasts predicted new home starts would be down 6% in 2018 and were predicted to drop by a further 2% in 2019 followed by an increase of 3% in 2020.

A recent House Building Report from 2018 reported that new houses reached 257,600 in 2017/18 (an increase of 18%) but the OBR expects this to fall by 7% in 2018/19 and then remain steady at that level. The report specifically states that maintaining the 2017/18 figures “would be a challenge”.



All of these estimates are well below the 26% growth used in the LAA and if maintaining an 18% growth is a challenge then even achieving let alone maintaining a 26% increase would be very difficult indeed. The 26% may be what has been identified as potential within local plans but it is nowhere near reality and would appear to be impossible to achieve in practice.

Even the West Sussex County Council Planning Services seems to be in agreement with this conclusion. Looking at the table below the planning department are predicting a large increase in 2019 but then house building starts fall back to almost half of those in 2017.

In order to use any of the scenarios We think there needs to a better forecast of predicted house price starts and/or an assessment of whether a 26% increase in building starts would be sustainable let alone possible. Why has this report tried to estimate house building when the WSCC Planning Services group already has a predictions of house price starts up to 2032 (which differ widely from those used here). We expect there are actual house start forecasts available that would be more appropriate. Identifying the available land to build on is not the same as actually building those houses.

Table 2 - West Sussex - Gross forecast housebuilding on large sites identified at 1st April 2017

District/ sub-area	Year commencing April					Total 2017 2021	Total 2022	Total 2023- 2027	Total 2028- 2032	Total 2017- 2032	Unlikely
	2017	2018	2019	2020	2021						
Adur	188	17	93	40	46	384	0	0	0	384	0
Arun	584	467	869	386	200	2506	108	534	240	3388	0
Chichester	440	629	563	513	443	2588	339	1752	1000	5679	27
Crawley	460	613	874	326	258	2531	280	1283	125	4219	0
Horsham	1333	1412	1242	707	363	5057	468	2404	980	8909	91
Mid Sussex	499	495	1596	540	504	3634	394	763	70	4861	31
Worthing	250	201	512	82	0	1045	0	0	0	1045	0
SDNP	71	262	233	57	12	635	12	0	0	647	9
West Sussex	3825	4096	5982	2651	1826	18380	1601	6736	2415	29132	158

Table 3 - West Sussex - Gross small sites identified at 1st April 2017

District/ sub-area	Under construction	With planning permission but not started		Total
		Detailed	Outline	
Adur	52	58	1	111
Arun	170	211	18	399
Chichester	144	267	5	416
Crawley	29	66	0	95
Horsham	148	269	1	418
Mid Sussex	110	370	30	510
Worthing	110	122	2	234
SDNP	89	143	1	233
West Sussex	852	1506	58	2416

Table 4 - West Sussex - Gross forecast housebuilding on small sites identified at 1st April 2017

District/ sub-area	Year commencing April					Total 2017 2021	Unlikely
	2017	2018	2019	2020	2021		
Adur	35	25	16	3	0	79	32
Arun	117	86	57	12	1	273	126
Chichester	112	84	56	14	0	266	150
Crawley	24	19	12	3	0	59	36
Horsham	114	85	57	14	0	270	149
Mid Sussex	111	95	62	22	2	290	220
Worthing	73	52	34	6	0	166	68
SDNP	66	48	32	7	0	154	79
West Sussex	652	493	327	81	3	1556	860

Note It is assumed that all dwellings under construction and 45% of those permitted but not started will be built in the five years 2016-2020. This represents a take-up rate of about 60% on all small sites in the county as a whole

Table 5 - West Sussex - Gross forecast housebuilding on all sites identified at 1st April 2017

District/ sub-area	Year commencing April					Total 2017 2021	Total 2022	Total 2023- 2027	Total 2028- 2032	Total 2017- 2032	Unlikely
	2017	2018	2019	2020	2021						
Adur	223	42	109	43	46	463	0	0	0	463	32
Arun	701	553	926	398	201	2779	108	534	240	3661	126
Chichester	552	713	619	527	443	2854	339	1752	1000	5945	177
Crawley	484	632	886	329	258	2590	280	1283	125	4278	36
Horsham	1447	1497	1299	721	363	5327	468	2404	980	9179	240
Mid Sussex	610	590	1658	562	506	3924	394	763	70	5151	251
Worthing	323	253	546	88	0	1211	0	0	0	1211	68
SDNP	137	310	265	64	12	789	12	0	0	801	88
West Sussex	4477	4589	6309	2732	1829	19936	1601	6736	2415	30688	1018

Note Table 5 brings together the projected completions on large identified sites (Table 2) and small identified sites (Table 4)

Ian Hayward
Planning Services
Economy Planning and Place
West Sussex County Council

Commitments as at 31/03/2017
Data Extracted on 24/11/2017

1A-2 Resource Availability

How up to date are the resource assessments? It does not appear to be possible to independently verify the current reserves. This makes it rather difficult to assess whether they are realistic. Table 6 of the LAA provides a list of currently permitted quarries but does not provide reserve estimates. We understand that operators of current sand quarries keep the reserve estimates confidential. Why is that and how are we to effectively assess requirements if they refuse to release reserves estimates? Other extractive industries, such as oil and gas production, have to be open about reserves. We fail to see how this plan can be in any way meaningful without publicly available reserves estimates.

We also question the reliability of the overall resource assessment. For example, we note that the existing quarry at Minsted is not included. A recent planning review found that, despite the current cessation of production because of a number of breaches of planning consent, the planning committee concluded “it is reasonable to conclude that there are remaining reserves within the site and that works to extract these reserves have not permanently ceased” (Report to SDNP Planning Committee by the Director of Planning 11 October 2018). This report stated that the operator said there are circa 480,000 tonnes still to be worked and concluded that “With regards to the remaining reserves on site, a more detailed topographical survey is required showing the remaining reserves” suggesting that there may be more reserves than currently estimated. We understand that there are other problems at Minsted but if this is not included, how many other sites have been left out for unknown reasons? It results in a complete loss of confidence in the reserve estimates provided.

We also question why reserves of marine sands have been so quickly discounted. The plan suggests that marine sands have been discounted “on this occasion”. What is the justification for that omission from the start? If the reserves of marine sands were included in the WSMLP assessment 2018-2033 then there would absolutely be no need to quarry in the South Downs National Park.

The MLP Inspectors report states (para 29)

“The Authorities have stated that there is potential for marine won soft sand to contribute to a steady and adequate supply of soft sand in the Plan area, but were not seeking to rely on this to meet the identified need within the Plan. Therefore, it was agreed at the hearing sessions that this was not a viable alternative to land-won soft sand at the current time.”

It appears that a potentially large resource has been simply ruled out for convenience of the planning group. We note that the report states that marine sands are not used as a source of soft sand in the south but this is not an acceptable reason to remove them when the report also says they are used throughout the rest of the country. So there is no technical reason not to use marine soft sands, there is just some kind of historical precedence that needs to be changed.

Question 1B: Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

1B-1 Future Soft Sand Requirements

A recent report by the UK Independent Committee on Climate Change (UK Housing: Fit for the Future? Feb 2019) concluded that government targets for greenhouse gas emissions would not be met without widespread changes in housing construction practices. One of the specific findings was the need to improve the focus on reducing the whole life carbon impact of new homes by increasing the use of wood in construction and reduce high carbon materials such as cement and concrete. They recommend the implementation of new policies to change the way houses are built. These changes could significantly impact the requirements for soft sand in the long term.

Question 1C: Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/ evidence to support your view.

Yes. The demand curves seem too high. It is also difficult to see how the shortfall has been identified and there seem to be inconsistencies in the findings of the LAA that we cannot reconcile.

The West Sussex LAA Dashboard 2018 table at the end of the Executive Summary shows that West Sussex has a landbank for soft sand of 7.4 years and may be as much as 9.4 years (Para 2.1.20). As the requirement is for a landbank of at least 7 years this would seem to be adequate (although the MLP inspectors report seems to be suggesting that “at least” means “more than”). However, Table 21 suggests that there is a demand of approx. 5.6 mT and reserves of 2.75mT. So where did the 7.4 years landbank come from and why is it different from the demand/reserves estimates provided later in the report? We also note that these numbers are

different from those shown in MM21 of the MLP Inspector's report which suggests a landbank of 10.7 years which is well over the 7 year landbank required.

The summary table on soft sand (page 22) concludes that an additional 1.66 – 2.83mT is needed over the period of the plan to 2033. The next section highlights that West Sussex is a net exporter of 1.82mT. Elsewhere in the report it states that most of these exports are to the London area. The MLP Inspectors report criticises the previous assessment for assuming imports from Kent and Oxfordshire including potential impacts from lorry traffic. And yet this report appears to consider that continued exports to London from inside a National Park with its associated traffic along much busier routes are acceptable. In addition, the impacts of lorry traffic to London would probably be higher given traffic issues and potential Air Quality Management Areas along the route

In addition, the large range of numbers used for planning is derisory, e.g. exports range from 42,400 – 275,600mT (14% to 94%) of the quoted demand forecast of 293,737mT. As such, proper conclusions cannot be drawn and does not justify the environmental harm to the landscape. The industry cannot hide behind 'confidentiality reasons' for not producing more accurate data. If the Industry were made to pay the true cost of damage to the environment, this 'justification' would never be accepted – the SDNPA should lobby accordingly

- With up to 94% of sand & gravel being exported out of West Sussex there is no correlation with house building in West Sussex as a driver for growth in demand.
- The data does not support the inspector's statement (para 30) about the 'strategy to rely on imports from surrounding authorities', indeed the opposite is true
- Para 31 of the inspector's report recognises the 'significant adverse effects in terms of transport' yet up to 27% of the sand gravel is being exported as far as Buckinghamshire that borders Oxfordshire

PART C: ISSUE 2

Question 2A: Do you consider that all 'reasonable alternatives' for soft sand supply have been identified or are there other options that we should be considering?

Note Question 1A response on reserves remaining in the existing sand quarry at Minsted and accuracy of other reserve estimates. Further work needs to be done on a more accurate assessment of current reserves and potential marine reserves see 1A above and 2C below.

Question 2B: Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

References made throughout comments.

Question 2C: Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

The only reasonable option is E – a combination of alternatives (marine dredged), supplies within West Sussex and supply from outside West Sussex

As the Campaign for National Parks says.

“National policy should be based on an approach which places a greater emphasis on encouraging more efficient use of minerals including managing demand for new minerals, recycling, use of appropriate alternative products and significantly reducing waste in construction.”

The preferred strategy needs to reflect this and include.

- Accurate demand estimates based on building starts
- Accurate estimates of reserves within existing quarries – which we do not have, have not been provided or appear to be commercially confidential
- Consideration of future improvements in building practices (see recent comments to Q 1B) with particular reference to timber frame house building
- Review of existing practices e.g. why mortar manufacturers in the southeast do not use marine won sand when it is used in other parts of the country (see LAA 2.2.9)
- Balance of imports and exports from each county
- Aggregates exported to other countries (of the 15 mT of marine landings over 5mT is exported to Europe)
- Other areas raised by the CNP including alternative products, recycling and reducing waste

As far as we can see the LAA has taken some unsupported numbers and immediately leapt to the conclusion that more new quarries are required.

There are other sources that have not been properly considered.

Option D - Marine provides the least environmental impact and the most reasonable sustainable solution.

The understanding of the use of marine dredged sands appears very weak with statements in the consultation document such as,

- 2.2.1 states that marine won sand and gravel is not considered a viable substitute and yet
- Para 2.2.9 of the LAA. Mortar manufacturers in the south east may be using marine won sand in the products in place of soft sand. The use of marine won sand is more common in other parts of England,
- para 3.20 'it is not known if this material is being blended with other, land-won sand, or is a direct substitute' This needs to be known!
- Para 3.23 states that 'the industry may be turning towards utilising more of this resource' Why is this not known?

Option C – as stated earlier, the demand data is so poor with potentially 94% being exported out of West Sussex, including 27% to Buckinghamshire, that if the harm from transport is being properly considered then these practices should be discouraged by reducing the amount produced in West Sussex.

A fundamental principle is that a National Park provides the highest level of environmental protection, higher than an ANOB used by other authorities, e.g. Kent and Oxfordshire, to protect their landscape. It was one of the reasons why there was a lobby against the setting up of the SDNPA as it was felt that it would dilute the level of protection from AONBs as now appears to be the risk.

Para 25 of the Inspectors report makes the statement that 'Oxford County Council has noted that soft sand would need to be transported by road over the likely feasible distance and that there is no scope to export soft sand by rail to West Sussex'. As stated, up to 27% is exported to Buckinghamshire that is adjacent to Oxfordshire! And on para 26 – Surrey has deep sand deposits that are not in a National Park.

The focus on supply from within the county boundaries seems to be completely the wrong approach And yet this approach seems to be the prime focus of this consultation and the previous remarks made by the MLP Inspector. What about those counties that have insufficient resources? Will there be no building in those areas as they do not have sand? There seems to be an inconsistency in expecting the West Sussex exports to continue and yet say that imports are unacceptable.

As stated elsewhere in this response, the inspector said that West Sussex cannot rely on sand imported from other counties but in the same report finds that West Sussex must continue the level of export it currently has This seems rather hypocritical. If we are going to rely on each county to supply sand locally then we would

suggest we stop the 1.8 million tonnes of planned exports from West Sussex and that would make up much of the just over 2 mT shortfall.

It happens that most of the potential sand reserves in West Sussex are within the SDNP. However, it is a **National** Park and has been designated as such based on its uniqueness to the nation as a whole, not West Sussex. Mineral developments can occur in a national park under exceptional circumstances. We fail to see where those exceptional circumstances have been demonstrated other than there are limited reserves in West Sussex outside the park. That is not exceptional when there are significant other local reserves that can be exploited. Marine reserves appear to be under-represented. In addition, the LAA Map (Appendix A) is not very accurate but there do appear to be large reserves of sand stretching north from Petersfield.

The sands are what define the habitat that resulted in the inclusion of this area north of the Downs in the SDNP. To remove the sands would destroy the habitat around Midhurst that defines the SDNP ("Heart of the South Downs National Park").

Question 3: Do you have any comments on the draft Sustainability Appraisal of the Options

This report does not in any way review the sustainability of the options.

There is nothing sustainable about minerals extraction. Once it is removed, it is gone and cannot be reinstated so it is in no way sustainable. What this report and many other reports on sustainability refer to is ensuring efficient operations with impacts as low as practicable.

Next, this report in no way reflects an assessment of sustainability. It basically takes sites that have already been selected and tries to shoe horn those sites into a framework that does not reflect the issue. A true sustainability report would look at the problem over the whole lifecycle, similar to the strategy outlined in Question 2C above. For example

- How can we reduce demand
 - More accurate forecasting
 - Changes in house building practices
 - Reduce waste
- How can we make the most of existing reserves
 - Accurate estimates of reserves
 - Improve efficiency of extraction
 - Make the most of existing sites
 - What do we do with existing sand produced – where is it used
- etc

All of these reports just take inaccurate estimates of demand and supply and then suggests we dig more holes in the ground to meet the difference. That is not a sustainable framework.

On the report itself, it would be very helpful if you used the specific title of the document in the question rather than some approximation as it makes it rather confusing. Does this document refer to the "Sustainability Appraisal including Strategic Environmental Assessment – Main Report"? Or some other document perhaps one we have not seen? How does it relate to question 8 which also refers to a sustainability appraisal? There is also a section titled "sustainability appraisal" in the "Soft Sand Sites Selection Report". We are going to assume this question refers to the SA and SEA – Main Report.

There are quite a few errors in that result in a complete lack of faith in the quality of the contents. We suggest a proper quality assurance review prior to further consideration.

Specific comments

Section 2, Table 2.1j Suggests a separate non-technical summary has been produced. Perhaps you could provide a reference or link to this. It certainly would be helpful in digesting 139 pages in this report. We have seen there is a non-technical summary from the previous review issued in 2016. Perhaps this is what is being referred to but it isn't clear

Section 2 1. As stated above, for clarity why not list the chapter headings to match the actual headings in the report

Figure 2.1. We note the key to symbols used here but we notice that at a number of points throughout the report multiple symbols are used, particularly either a + or – with a ?. so what does that mean? If it is uncertain why not just say it is uncertain and not attempt to pre-judge by adding another symbol?

Table 3.2. We find the conclusions made in this table to be rather poorly thought through. The suggestion seems to be that preparation and agreement of the JMLP is going to solve all of the environmental and sustainability issues associated with minerals extraction in West Sussex! Some of the conclusions just don't follow. For example, Point 4 declines in biodiversity. How does preparation of a JMLP help protect biodiversity? Any mineral development would require planning permission and we assume an EIA. A JMLP could help control regional or cumulative effects but we do not see how it has any bearing on site specific impacts once a site is chosen. Similar arguments could be made for a number of the issues raised in this table, just substitute flooding, water quality, air quality etc for biodiversity.

Table 3.2. How can employment in the minerals section decrease in the absence of the JMLP. Some of the sites (e.g. Severals East and West) are proposing to use companies outside of West Sussex so it is possible that it has no effect on local employment. These sites require a relatively small number of people and will have little impact on local employment

We don't see the point of Tables 5.1 and 5.2. Both tables include statement of the obvious.

We do not find this report to be particularly helpful. We are not convinced that the report in any way meets the requirements of a Strategic Environmental Assessment. We would expect an SEA to identify some of the key environmental hazards that may result from mineral extraction. We do not see this anywhere in the report.

PART D: ISSUE 3

Question 4: Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

According to the Campaign for National Parks most National Park Authorities (NPAs) are Mineral Planning Authorities (MPAs) and are expected to identify areas where mineral resources are known to exist. However, unlike other MPAs, they are not expected to identify areas where planning permission might reasonably be expected (known as Areas of Search or Preferred Areas). So we fail to see how this whole site selection process fits within this framework.

The Issues and Options Consultation sets out 5 site selection principles

1. Places where there are opportunities to restore land beneficially
2. Places without a sensitive natural or built environment and away from communities
3. Sites that have a good access to the Lorry Route Network
4. The need to conserve and where possible enhance protected landscapes in the area
5. A preference for extensions to existing sites rather than new sites, subject to cumulative impact assessments.

It would have been very useful if the reports assess how each of the sites met these strategic principles. Surely that should be the first stage since these principles were established. We are most interested in my local sites of Severals East and West and we do not see how they meet any of these principles as described below

1. Both sites have undergone extensive habitat improvement over the past years with significant sums of money invested
2. Both sites occupy sensitive heathland sites which are one of the key habitat types identified in establishing the boundaries of the SDNP and are adjacent to existing housing
3. A local lorry route is relatively close but access is dangerous, it would be unable to handle what is estimated to be up to 300 lorry movements per day and there are significant restrictions due to road size to the west and AQMA's to the east and south.
4. Removing the sand would completely destroy the heathland habitat with no possibility of conserving or enhancing (the assessment suggests a completely unnatural restoration of broad-leaved woodland and interlinked ponds which is definitely not in keeping with the area).
5. Both are completely new sites with a high potential for significant cumulative impacts.

If the sites do not fit the 5 basic principles then there is little point in going through all of the extended detail outlined in the other reports.

We have provided detailed comments to support these conclusions in the site specific information at the end of this document

Question 5: Do you have any comments on the nine shortlisted sites identified in the Issues and Options Consultation Document?

Comments provided on Severals East and Severals West attached at the end of this document.

Question 6: Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

None at this time

Question 7: Are there any sites that we should be considering that are not included in the Soft Sand Site Selection Report (4SR)?

Yes marine sources and sources outside of West Sussex. See previous comments above

Question 8: Do you have any comments on the sustainability appraisal of the potential sites?

Is this different from Q3?

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 sites?

We have yet to see a demonstration of exceptional circumstances that make minerals development within the SDNP acceptable. What are the exceptional circumstances? How have they been defined? This is the root of the question before the site selection process can continue in any way. The MLP Inspector raised the issue of "exceptional circumstances" but in reopening this review his report stated that "there is the potential, in the future, for exceptional circumstances" (Para 15). That means that no exceptional circumstances exist at present and therefore mineral development in the SDNP is not acceptable. The inspector seems to be going against policy by ignoring the exceptional circumstances criteria for selection of sites within the SDNP. This should be the key requirement before considering mineral extraction within the SDNP.

Also see comments in Question 4 on the guiding principles and the lack of any assessment against those principles.

[Redacted]

[Redacted]
Sent: 19 March 2019 16:46
To: PL MWDF
Subject: FW: A contact us online form was submitted

Good afternoon,

Please see the email below regarding a West Sussex County Council Consultation on Soft Sand Extraction.

Please respond appropriately to the persons below.

Thank you for your time.

Regards,

[Redacted]

[Redacted]

[Redacted]

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If replying directly to this email please remember to double check the email address you are replying to.

Field	Entry
Title	Mr
First name	Steve
Last name	Williamson
Email address	
Contacting on behalf of	Rogate Parish Council
Your comments	<p>WSSC Consultation on Soft Sand Extraction Sites - Rogate Parish Council Response. Three of the proposed sites are within the National Park and will also have an impact on the HGV movements along A272: 1 East of West Heath Common - south of A272 at Durleigh Marsh – extension of existing site 2 Minsted West – south of A272 opposite Stedham – extension of existing site 3 Several East and West – south of A272 and west of Midhurst – new site currently commercial forestry. Q 4 Do you have any comments on the site selection methodology, as set out in the 4SR report? No Q 5 Do you have any comments on the nine potential sites identified in the table above? Yes 1 Red Amber Green (RAG) Assessment of green in 4SR document is incorrect as Durford Lane is single track with no passing places and stated increase in HGVs of 4/hr traveling to Midhurst is unacceptable through Rogate village Conservation Area. No assessment of westbound traffic given. 2 RAG Assessment in 4SR of green is incorrect as Minsted Road is single track with no passing places and stated increase in traffic on A272 of 5% is entirely unacceptable through Rogate village Conservation Area. Note the RAG assessment contradicts the Severals East and West assessments of amber. 3 RAG Assessment in 4SR of amber is probably correct as Severals Road is single track with no passing places and stated increase in traffic on A272 of 5% is entirely unacceptable through Rogate village Conservation Area. Note that it states the “The site poses moderate risk of causing harm especially if HGV traffic passes through villages”</p>

As it will have to pass through Rogate Conservation Area it will therefore cause harm. Q 6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the 4SR? No Q 7 Are there any sites that we should be considering, that are not included within the 4SR report? Sites at Frith End and Kingsley in east Hampshire are close to WSCC boundary and not in SDNPA Q 8 Do you have any comments on the SA of the potential sites? The fact that most of the sites and within the SDNP should be sufficient to exclude them – there are no extraction or quarry sites within New Forest National Park. Even so, not sufficient weight given to environmental and safety issues resulting from additional or continuing HGV movements through Conservation Areas. Q 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)? Yes. Any site within the National Park should be excluded. March 2019



[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Our ref:

Your ref:

20 March 2019

Dear Sir / Madam,

Soft Sand Review of the West Sussex Joint Minerals Local Plan: Issues and Options Consultation (Regulation 18)

Thank you for consulting Horsham District Council on the Soft Sand Review Issues and Options Consultation. The Council recognises the need to plan for mineral supplies in the future and is supportive of the vision and strategic objectives outlined in the West Sussex Joint Minerals Local Plan.

We note that there are two potential new sites for soft sand extraction which lie within the Horsham District, Bunton Manor Farm and Ham Farm, and one, Chantry Lane Extension, adjoins the district within the South Down National Park.

Our answers to the questions proposed in the consultation are in the attached sheets.

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,

[REDACTED]

**Cabinet Member for Planning and
Development Horsham District Council**

HDC Response to the Soft Sand Review of the West Sussex Joint Minerals Local Plan - Issues and Options Consultation (Reg.18)

Question 1	Demand Forecast Scenarios	Answer
a)	Which soft sand demand scenario do you think that the Authorities should use?	<p>We believe the Joint Minerals Local Plan should use the highest scenario, Scenario 3.</p> <p>It is prudent to plan for the highest demand scenario, to ensure that sufficient provision is made for a steady and adequate supply of soft sand. This would enable phased extraction to meet the projected demand which will change over time. In addition having an adequate supply of sites will prevent having to repeat the process in future to find more sites in the event of a shortfall and the consequent associated costs this would entail.</p>
b)	Do you think that there are any other matters that should be taken into account when determining the need for soft sand?	No.
c)	Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.	No.
Question 2	Strategy for Soft Sand Supply	Answer
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?	Yes.
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?	No comment.

HDC Response to the Soft Sand Review of the West Sussex Joint Minerals Local Plan - Issues and Options Consultation (Reg.18)

c)	Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.	Option B: Supply from sites within West Sussex, including within the National Park. Five of the nine shortlisted sites are extensions to existing soft sand extraction sites within the SDNP, which would be more acceptable and less intrusive on the landscape than the creation of new sites.
Question 3	Strategy for Soft Sand Supply	Answer
	Do you have any comments on the draft SA of the options?	No comment.
Question 4	Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?	No comment.
Question 5	Do you have any comments on the nine shortlisted sites identified in the Issues and Options Consultation Document?	Yes. See below
	Bunton Manor Farm	We object to the inclusion of Bunton Manor Farm as a potential soft sand extraction site. We regard the impact on the landscape as unacceptable. See Question 8.
	Chantry Lane Extension	We have no objection to the inclusion of Chantry Lane Extension as a potential soft sand extraction site. We note that although the extension site is within the SDNP area, the effects of development on local traffic will effect roads within the Horsham District and may further congest the Air Quality Management Area of Storrington High Street. We would therefore not object in principle to the creation of a new direct access from the A283, as suggested in the Transport Assessment December 2015, to mitigate any increase of site traffic on the Washington Road west into Storrington and south to the existing site entrance on Chantry Lane. We would also advocate that the mitigation works to the Washington roundabout A24/A283 junction as proposed by the 2008 Supplementary Report for the (now withdrawn) Rock Common Extension site be implemented, and the impact on peak hour traffic congestion reduced through restrictions on the hours of operation.

HDC Response to the Soft Sand Review of the West Sussex Joint Minerals Local Plan - Issues and Options Consultation (Reg.18)

	Ham Farm	We have no objection to the allocation of Ham Farm as a potential soft sand extraction site. Further to our original reply to the Joint Minerals Local Plan Proposed Submission Draft (Regulation 19) Consultation, we are pleased to note that our comments regarding the potential impact of increased traffic on the road capacity and structure of A283 and the Washington roundabout A24/283 junction have been addressed. We are also pleased to note that our concerns regarding increased lorry usage through the Air Quality Management Zone in Storrington High Street have also been addressed. We welcome the requirement for a HGV routing agreement to ensure that Lorries travelling to and from the site avoid the villages of Steyning and Storrington.
Question 6	Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?	No comment.
Question 7	Are there any sites that we should be considering that are not included in the Soft Sand Site Selection Report (4SR)?	No.
Question 8	Do you have any comments on the sustainability appraisal of the potential sites?	Yes. See below
	Bunton Manor Farm	We strongly consider that soft sand extraction at Bunton Manor Farm will have the most severe cumulative impact on the local landscape. We are particularly concerned about its high visibility within the landscape especially from the South Downs National Park (Chanctonbury Hill) combined with its proximity to Rock Common sand pit. We are of the opinion that the development of the site should be regarded as having an unacceptable landscape impact.
	Chantry Lane Extension	We agree with the assessment of Chantry Lane site. From a landscape point of view, the extension of Chantry Lane will result in a further element of harm to a landscape already impacted by mineral working, which will need suitable restoration as part of any future consent.
	Ham Farm	We agree with the assessment that the Ham Farm site is of lower landscape sensitivity than the other two sites within and adjoining Horsham District. We note that the Ham Farm site was considered acceptable for the original submission version of the Joint Minerals Local Plan.

HDC Response to the Soft Sand Review of the West Sussex Joint Minerals Local Plan - Issues and Options Consultation (Reg.18)

Question 9	Do you have any comments on the proposed site selection strategy and guiding principles?	No comment.
	Are there any other factors that should guide the selection of allocated sites?	No comment.

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Part C - Issue 2

2a Do you consider that all reasonable alternatives for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

This site is in the National Park providing a wonderful safe environment for the people of Midhurst to walk their dogs, meet other walkers and for elderly people to exercise on a relatively flat terrain . As a retired dog trainer I know how important this area is for the people of Midhurst to walk their dogs in a safe and beautiful environment. I know do not own a dog but my husband and I and indeed many retired people walk here . It is close to the town, fairly even terrain and peaceful. Young families too can enjoy this area with easy access for buggies and children's tricycles. Indeed our grandchildren have enjoyed these walks and learned to love the country side.

The lane approaching the Severals is narrow and would cause a danger to anyone meeting heavy lorries , either driving, walking or cycling.

The noise too would be an invasion of the surrounding area..

Our countryside is being eroded and the people of Midhurst live in this beautiful area to enjoy the peace and tranquility of this beautiful part of Sussex. Please keep it this way.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

Part E - About You (The Equality Act 2010)

More questions About You

Age

████

████████████████

██

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██

██████

████████████████

Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-03-18 16:53:28

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED] (where relevant):

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

A3 Contact Address Details

Same as details provided in A1

Name:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Other:



Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

As currently applied

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

No

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

No

Part C - Issue 2

2a Do you consider that all reasonable alternatives for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

Option A I consider places too much major development in a small area of reserves and it is not proven at this stage that this restricted supply could meet demand

Option B I consider the most applicable as it allows for a diversification of locations and the opportunity for the SDNP to promote 'sustainable' development within the Park.

Option C I consider ignores the greater detrimental environmental impact of increased HGV traffic on a motorway network under strain across the region as a whole, I suggest the same principle applies to rail. Also the strong possibility that HGV traffic would be increased across the SDNP delivering sand from source to demand.

Option D does not supply the material actually required and the same concerns raised for option C would also apply.

Option E would I suggest provide a practical approach.

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

Option A I consider places too much major development in a small area of reserves and it is not proven at this stage that this restricted supply could meet demand

Option B I consider the most applicable as it allows for a diversification of locations and the opportunity for the SDNP to promote 'sustainable' development within the Park.

Option C I consider ignores the greater detrimental environmental impact of increased HGV traffic on a motorway network under strain across the region as a whole, I suggest the same principle applies to rail. Also the strong possibility that HGV traffic would be increased across the SDNP delivering sand from source to demand.

Option D does not supply the material actually required and the same concerns raised for option C would also apply.

Option E would I suggest provide a practical approach.

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

I suggest the SDNP in applying their statutory purposes may not be taking the opportunity of major mineral development to promote the economic and social aspects of such schemes for the greater long term good of the Park.

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

No

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Tick all the site boxes that apply (above) and provide comments below.:

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

No

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

The long term benefits should be given weight

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)?

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)?:

The long term benefits should be given weight

Part E - About You (The Equality Act 2010)

More questions About You

Age

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Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Part C - Issue 2

2a Do you consider that all "reasonable alternatives" for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

My main concern as a Bed and Breakfast business on the A272 in Midhurst is the impact of quarry lorries and also the destruction of local landscape . There are already a large number of quarry lorries travelling along the road and the vibration and noise problem in my property are severe. I have lived here for 31 years and am struggling with these lorries in particular (I assume they are the Lavington Quarry backfill lorries). The weight and speed of the lorries is too much, my house literally shakes off it's footing every time a quarry lorry goes past (always over the speed limit I add).

A new quarry on our doorstep will have devastating impact on the road weight and noise, and landscape beauty. Midhurst is the centre of the South Downs National Park. People come to stay here to enjoy the landscape and peace of the area. This is being destroyed by other business concerns - what is the point of supporting these quarries if the effect on the tourist industry is catastrophic? Not to mention the quality of life for those of us who live here. Please express my concerns.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

Part E - About You (The Equality Act 2010)

More questions About You

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Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-03-18 12:02:45

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

A2 Client Details if applicable

Title:

First name:

Last name:

Job title (where relevant):

Organisation or affiliation (where relevant):

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Email

Email address:

[Redacted]

Other (please specify below)

Other:

On behalf of 40 homeowners who live in Turner House (on Petersfield Road)

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Part C - Issue 2

2a Do you consider that all reasonable alternatives for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Minsted West, Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

Too many lorries driving through a small town

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

As above

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

Part E - About You (The Equality Act 2010)

More questions About You

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Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-03-15 17:46:59

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

A2 Client Details if applicable

Title:

First name:

Last name:

Job title (where relevant):

Organisation or affiliation (where relevant):

A3 Contact Address Details

Not Answered

Name:

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Part C - Issue 2

2a Do you consider that all reasonable alternatives for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Tick all the site boxes that apply (above) and provide comments below.:

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

Part E - About You (The Equality Act 2010)

More questions About You

Age

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-03-18 08:01:22

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

First name:

Last name:

Job title (where relevant):

Organisation or affiliation (where relevant):

A2 Client Details if applicable

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Organisation or affiliation (where relevant):

Easebourne Parish Council

A3 Contact Address Details

Not Answered

Name:

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Email

Email address:

[Redacted]

[Redacted]

Other:

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

The Parish Council note that West Sussex already have a land-bank of soft sand for the next seven years and possibly up to nearly eleven years which poses the question as to why further excavation is required. Should not efforts be made to identify more sustainable materials for future generations in consideration of the February 2019 UK industrial committee on climate change report to increase the use of wood and reduce the use of sand in the construction?

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Part C - Issue 2

2a Do you consider that all 'reasonable alternatives' for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Minsted West, Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

As the Parish of Easebourne sits within the South Downs National Park, the Parish Council wish to draw attention to the 'Major Development Test for National Parks', whereby something of this scale can only be passed following rigorous examination in exceptional circumstances and in the national interest. The Parish Council have seen no evidence to date to suggest that the allocation process is applying any rigour, over and above the normal process, nor is it satisfied that attempts are being made to source sand from beyond the County boundaries.

Easebourne Parish meets the town of Midhurst at ancient crossing point on a very narrow angled stone bridge. There are daily issues with heavy volumes of queueing traffic into and out of Easebourne and therefore, the implications of additional large heavy goods vehicles cause considerable concern.

The constantly halted traffic also has a major impact on air quality in the centre of Midhurst which is home to a large school, shops and offices which are well used by Easebourne Parish residents as the town provides many of the only facilities within walking distance. At this current time, the Parish Council understand that Midhurst is about to be designated an 'Air Quality Management Area', due to the poor quality of air within the town. Any additional traffic will clearly exacerbate the situation.

It should also be noted that Cowdray Estate were allocated £300K in grants to specifically improve this area of outstanding natural beauty and ancient woodland by the Forestry Commission. According to the Estate it is one of the most significant conservation orientated projects they have undertaken. An excavation of any

WEST SUSSEX SOFT SAND REVIEW: ISSUES AND OPTIONS

Please complete and return this form to Planning Services, West Sussex County Council, County Hall, Chichester, PO19 1RH by **18 March 2019**. Visit our website for further information: www.westsussex.gov.uk/mwdf.

Data Protection/Privacy: West Sussex County Council is registered as Data Controller(Reg. No. Z6413427). For further details and information about our Data Controller, please see www.westsussex.gov.uk/privacy-policy.

PART A: PERSONAL INFORMATION

A1. Personal Details

Name	<input type="text"/>
Job Title (where relevant)	<input type="text"/>
Organisation or affiliation (where relevant)	<input type="text"/>

A2. Client Details (if applicable)

If you are completing this form on behalf of someone else then please provide details of the person(s) or organisation you represent.

Name	<input type="text"/>
Job Title (where relevant)	<input type="text"/>
Organisation or affiliation (where relevant)	<input type="text"/>

A3. Contact Address Details

Please provide details of the person who should be contacted regarding this response

Address	<input type="text"/>
Telephone	<input type="text"/>
Email	<input type="text"/>

Preferred Method of Contact Post Email

Please tick all categories below that most adequately describe you.

- | | | |
|--|--|--|
| <input type="checkbox"/> Resident | <input type="checkbox"/> Parish/Town Council | <input type="checkbox"/> SDNPA Member |
| <input type="checkbox"/> Local Business | <input type="checkbox"/> District/Borough Councillor | <input type="checkbox"/> Government Organisation |
| <input checked="" type="checkbox"/> Minerals or Waste Industry | <input type="checkbox"/> County Councillor | <input type="checkbox"/> Non-Government Organisation |
| <input checked="" type="checkbox"/> Landowner | <input type="checkbox"/> Local Authority | <input type="checkbox"/> Other (please specify) |

If you submit a consultation response, your contact details will be used to automatically notify you of updates with regards to the soft sand review and minerals and waste planning policy. Please tick the appropriate box if you **DO NOT** wish to be notified of the following.

- | |
|--|
| <input type="checkbox"/> Progress and consultation on the Soft Sand Review |
| <input type="checkbox"/> Any further updates about Strategic Waste or Minerals Planning in West Sussex |

PART B: ISSUE 1

Question 1A: Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

Please see the attached supporting document ref: 250/1 - Soft Sand Representations - R1.1

Question 1B: Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

N/A

Question 1C: Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

N/A

PART C: ISSUE 2

Question 2A: Do you consider that all 'reasonable alternatives' for soft sand supply have been identified or are there other options that we should be considering?

N/A

Question 2B: Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

N/A

Question 2C: Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please see the attached supporting document ref: 250/1 - Soft Sand Representations - R1.1

Question 3: Do you have any comments on the draft Sustainability Appraisal of the Options

N/A

PART D: ISSUE 3

Question 4: Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

N/A

Question 5: Do you have any comments on the nine shortlisted sites identified in the Issues and Options Consultation Document?

Please tick all that apply and provide comments below.

- | | | | |
|--|---------------------------------------|---------------------------------------|---|
| <input type="checkbox"/> Buncton Manor Farm | <input type="checkbox"/> Chantry Lane | <input type="checkbox"/> Coopers Moor | <input type="checkbox"/> Duncton Common |
| <input type="checkbox"/> East of West Heath Common | <input type="checkbox"/> Ham Farm | <input type="checkbox"/> Minsted West | <input type="checkbox"/> Severals East |
| <input type="checkbox"/> Severals West | | | |

Please see the attached supporting document ref: 250/1 - Soft Sand Representations - R1.1

Question 6: Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

N/A

Question 7: Are there any sites that we should be considering that are not included in the Soft Sand Site Selection Report (4SR)?

N/A

Question 8: Do you have any comments on the sustainability appraisal of the potential sites?

N/A

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 sites?

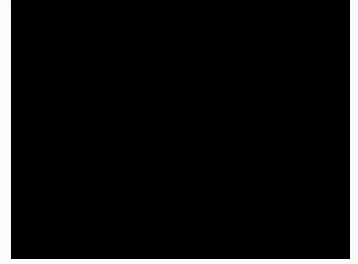
Please see the attached supporting document ref: 250/1 - Soft Sand Representations - R1.1



Soft Sand Single Issue Review - Issues & Options - Representations

The Barlavington Estate

Document Reference: 250/1/1--R1.1



Document Title: Soft Sand - Single Issue Review - Issues & Options - Representation
Document Reference: 250/1/1--R1.1
Site / Project:
Client: The Barlavington Estate

Document Versions

1.1	05/03/2019
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Prepared by: CH
Checked by: MM
Approved by: CH Director

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1.1 Introduction

1.1.1 The Mineral Planning Group Ltd (MPG) have been commissioned by The Barlavington Estate (BE) to make representations on the West Sussex County Council (WSCC) & South Downs National Park Authority (SDNPA) Single Issue Soft Sand Review, Issues and Options Consultation Document (IOCD).

1.1.2 MPG have previously made representations on behalf of BE regarding the proven, *“Nationally Significant”*, Silica Sand deposit known as Horncroft.

1.1.3 MPG are a specialist Minerals, Waste & Environmental consultancy who specialise in making planning applications for mineral extraction sites and their subsequent restoration.

1.1.4 Examples of the relevant qualifications that are held by MPG staff in this instance include:

- MRTPI – Membership of the Royal Town Planning Institute
- FGS – Fellowship of The Geological Society
- FIQ – Fellowship of the Institute of Quarrying
- MIQ – Membership of the Institute of Quarrying

2.1 Questions to be Considered

2.1.1 Our representations focus on the following questions posed by the IOCD:

1. a) *Which soft sand demand scenario do you think that the authorities should use? Please provide reasons for your views.*
2. c) *Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.*

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

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)?

3.1 ***Question 1: a) Which soft sand demand scenario do you think that the authorities should use? Please provide reasons for your views.***

3.1.1 Scenario 3 is the only option that fully ensures both a Steady & Adequate supply. If Scenario 1 is adopted and there were to be an uplift in demand for soft sand (as has been, reasonably, projected) there would be several years (industry average is 5-10 years) lead-time to identify and establish new mineral sites.

3.1.2 Furthermore, Scenario 1 would, in effect, ‘ignore’ the findings of Appendix B to the West Sussex County Council Local Aggregate Assessment which provides evidence for the anticipated 26.8% uplift in housing numbers during the Plan Period.

3.1.3 ***Question 2: c) Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.***

3.1.4 We consider that:

“Option A: Supply from sites within West Sussex but outside of the National Park”

is the same as *“planning for a declining amount of sand extraction from within the National Park”*, an approach which The Authorities were instructed by The Planning Inspectorate to remove from the Joint Mineral Local Plan in order to achieve ‘soundness’.

- 3.1.5 We consider that only *“Option B: Supply from sites within West Sussex, including within the National Park”*, can facilitate a Steady and Adequate supply of soft sand.
- 3.1.6 The Authorities own data, summarised in the table at paragraph 4.7 of the IOCD indicates that of the Shortlisted Sites, only two are outside of the National Park.
- 3.1.7 The maximum yield from the two sites located outside of the National Park is just 1.75 million tonnes, some 1.13 million tonnes short of the calculated shortfall of soft sand in ‘Demand Forecast Scenario 3’ and 1 million tonnes short of the calculated shortfall of soft sand in ‘Demand Forecast Scenario 2’.
- 3.1.8 On the other hand, the Shortlisted Sites within the National Park may contribute up to 10.3 million tonnes during the plan period, a surplus of 7.5 million tonnes.
- 3.1.9 Based on the data that The Authorities have to-hand, a Steady and Adequate supply of soft sand cannot be planned for without the inclusion of, at least, some of the sites within the National Park.
- 3.1.10 *“Option C: Supply from areas outside of West Sussex”* is ‘at-odds’ with paragraph 224 (b) of the NPPF which states:
- “...so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, **whilst aiming to source minerals supplies indigenously**;
- 3.1.11 The Authorities have recognised an ample indigenous supply of soft sand through their ‘Shortlist’ and are, therefore, instructed by National Planning Policy to make use of it before seeking to import minerals.

3.1.12 We do not consider *“Option D: Supply from alternative sources including marine dredged material”* to be viable at this time as there is no evidence to suggest that it can directly substitute land won soft-sand in its end-uses.

3.1.13 We do not consider Option A, C or D to be capable of ensuring a Steady & Adequate supply of soft sand. Therefore, adopting Option *“Option E: A combination of the above options”* would be founded on flawed approaches and ultimately be inappropriate in itself.

3.1.14 In summary, we consider Option B as the only suitable approach.

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

4.1.1 We only comment that it is clear the calculated soft sand need cannot be met from sites outside of the National Park alone.

5.1 *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)?*

5.1.1 We appreciate that Appendix 3 of the Soft Sand Site Selection Report (January 2019) provides a brief summary of the reasons for elimination. However, it does not indicate whether those who had promoted the sites for allocation were given the opportunity to mitigate the perceived unacceptable impacts of their site through re-design, or, alternatively demonstrate ‘Exceptional Circumstance’.

5.1.2 To entirely discount a site on the basis of a highly subjective and often readily manageable issue such as Landscape Impact at a ‘pre-planning’ stage without the benefit of Landscape and Visual Impact Assessments (LVIA), or, similar, may prejudice certain viable deposits in favour of other more constrained / smaller / lower quality sites that appear, in the first instance, to have a lesser impact on Landscape Character.

6.1 Summary

6.1.1 MPG's representations on behalf of BE can be summarised to the following:

- Scenario 3 is the only suitable option to ensure a Steady & Adequate supply of soft sand on the basis of the evidence supplied in Appendix B of the latest LAA.
- Option A is, in essence, 'Managed Retreat' / 'Planning for a reduction in supply' from the National Park, an approach that has already been deemed 'unsound' by the Planning Inspectorate. Only Option B can afford a Steady & Adequate supply of soft sand.
- The calculated soft sand 'need' cannot be met from outside the National Park alone.
- Excluding sites on the basis of potential landscape impact alone at the pre-application stage may have prejudiced viable sites in the absence of appropriate supporting studies.

Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-03-13 16:25:24

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

A2 Client Details if applicable

Title:

First name:

Last name:

Job title (where relevant):

Organisation or affiliation (where relevant):

A3 Contact Address Details

Same as details provided in A1

Name:

[Redacted]

[Redacted]

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Other:

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

The National Trust does not wish to comment on this question

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

The National Trust does not wish to comment on this question

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

The National Trust does not wish to comment on this question

Part C - Issue 2

2a Do you consider that all reasonable alternatives for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

The National Trust considers that the options set out in the consultation document will enable all reasonable alternatives to be considered going forward.

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

The National Trust does not wish to make any comments on this question.

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

The National Trust recognizes the importance of facilitating the sustainable use of minerals as being important to achieving sustainable economic growth. However, the Trust is concerned about the potential impact that the proposals would have on the South Downs National Park in terms of character and appearance and would question whether this can be considered to be compatible with the aims of the National Park to "conserve and enhance the natural beauty, wildlife and cultural heritage." The National Trust therefore considers that Option B should not progressed and that Option E would be our favored approach, but that in looking for sites within West Sussex for soft sand sites within the National Park are excluded.

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

The National Trust does not wish to make any comments on this question.

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

The National Trust considers that the methodology has already been endorsed by the previous Minerals Plan Inspector and therefore has been subject to a high level of scrutiny through the previous Examination process. On this basis we do not have any comments to make.

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Duncton Common, Minsted West, Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

Duncton Common

The National Trust owns and manages Lavington Common which immediately adjoins the western side of the proposed site. The Trust's ownership was extended in 2001 to include Lavington Plantation which is being restored back to heathland. Lavington Common is a SSSI which is currently graded as being "favourable" by Natural England.

The National Trust objects to the inclusion of the proposal for Duncton Common for the following reasons:

1. Ecological Impact - Lavington Common is a nationally important ecological site recognized by its designation as a SSSI. The SSSI citation highlights that the Common is particularly important for its high concentration of uncommon spiders. The Common also provides an important habitat for sand lizards which are a nationally protected species for which there is ever diminishing habitat. The National Trust is extremely concerned that the noise, vibration and general

disturbance associated with the proposed mineral working will have a significant adverse impact on this important wildlife habitats and the species within it. The National Trust consider that this is contrary to the guidance within paragraphs 170, 174 and 175 of the NPPF.

2. Noise and Disturbance - the site sits immediately adjacent to an important area of heathland within this part of West Sussex which is enjoyed by many for its tranquility. The introduction of an industrial process will inevitably have an adverse impact on this character and The National Trust considers that this will not be possible to mitigate against.

3. Site Access - the site will need to be accessed from the existing narrow, rural road to the south of the site and onto the A285 at the T-junction to the east. Improvements to this rural lane would be difficult to achieve without having an adverse impact on its rural character. Improvements to the junction of this lane with the A285 will also be difficult to achieve due to the proximity of the existing residential property. The Trust understands that this junction with the main road has a poor highway safety record and consider that the introduction of a significant number of HGV movements will exacerbate this. The Trust is therefore concerned that a safe highway access to the site will not be possible.

4. Impact on Hydrology - The National Trust has previously monitored the Water Table levels within the Common following the development of Heath End Sandpit. The heathland habitat is very sensitive to changes in the Water Table and the Trust is concerned that an additional mineral site adjacent to the Common could adversely impact on the Water Table and consequently the heathland itself and also the condition of the SSSI.

In conclusion the National Trust consider that this site should not continue to be promoted through the SSR because of the adverse impact that such a proposal would have on a nationally important ecological site and species, the local highway network and the fragile lowland heathland within West Sussex.

Minsted West

The National Trust owns and manages the Woolbeding Estate and Gardens which are situated to the north east of the proposed Minsted West site, on the northern side of the A272. The Woolbeding Estate comprises approximately 450ha of land which stretches from the River Rother at its southern end to the heathland at Woolbeding Common at the northern end of the Estate. Woolbeding Gardens is a beautiful 20th Century masterpiece garden with nationally important trees and plants set alongside the River Rother.

The National Trust recognise that this site adjoins an existing mineral workings and consider that the visual impact from our land will be limited. However, The National Trust is concerned about the impact on the Woolbeding Estate and Gardens arising from the cumulative impact of having three mineral workings proposed in such close proximity to each other and the Trust's land, as they will all be accessing the A272 as the main arterial route to consumers and the additional noise and disturbance that this would cause to the quiet enjoyment of the Gardens and Estate is of significant concern to the Trust.

Severals East and Severals West

The National Trust owns and manages the Woolbeding Estate and Gardens which are situated to the north of the proposed Severals sites, on the northern side of the A272. The Trust considers that the issues that it wishes to raise are relevant to both sites and therefore have considered them together, rather than duplicate comments unnecessarily.

The National Trust strongly objects to the inclusion of these two sites within the shortlisted sites in the SSR for the following reasons:

1. Traffic Impact - the amount of traffic generated by such a large scale proposal will have a detrimental impact on the character of this part of the South Downs National Park (SDNP). The existing access to the site is not adequate for HGVs and neither is the junction with the A272 and therefore upgrading of both will be required or a new access created directly onto the A272. The National Trust considers that this will have a significant impact on the rural character of the area.

2. Noise and Disturbance - one of the major characteristics of both the Gardens and the wider estate at Woolbeding, identified by both staff and visitors, is its tranquility and this combined with its unspoilt rural character and sense of remoteness, particularly at the northern end of the Estate, give it an almost unique sense of isolation in the SDNP. The introduction of such major development will result in noise and disturbance from machinery which impact on these unique characteristics to the detriment of people's enjoyment of them. The additional HGV traffic will further add to this noise and disturbance. The National Trust consider that this impact will be almost impossible to mitigate against and that it would adversely affect the enjoyment of this highly valued area within the National Park.

3. Visual Impact - the two proposed sites currently comprise of conifer plantations, although some clearance has been undertaken in conjunction with the South Downs National Park Authority (SDNPA) for habitat creation and wildlife corridors. The sites provide the visual backdrop for both the gardens and the southern end of the Estate and the loss of the woodland would dramatically alter the setting of these sensitive landscapes. In addition, due to the substantial changes in topography across the Estate, significant views are afforded towards the scarp slope to the south and it is considered that the introduction of such a large mineral site would have a significant adverse impact on the character and appearance of the SDNP when viewed from the Trust's land. The Trust considers that these long distance views have not been properly considered in the assessment of these sites and therefore would suggest that the RAG status is therefore not accurate in assessing its impact on the SDNP. The National Trust considers that such an impact cannot be mitigated and is contrary to paragraph 172 of the NPPF.

4. Residential Amenity - The National Trust owns Heathbarn Farm and 1 and 2 Severals Cottages which lie immediately to the east of the proposed Severals East site. The Trust considers that there will be a substantial loss of residential amenity as a result of noise and disturbance and visual intrusion arising from the proposal. The loss of income or reduced rental income will have a direct impact on the Trust's ability to manage the Woolbeding Estate and consequently its accessibility, interaction with the local community and long term management could all be adversely affected.

5. Flooding and River Silting - The land within the Trust's ownership has experienced increased flooding within the last decade and this was particularly bad in the 2013/14 winter period when large parts of the Estate flooded for what is believed to be the first time. Flooding has a detrimental impact on the garden in particular and the Trust is concerned that this proposal would increase flood heights through the removal of vegetation increasing run-off rates. This would be further exacerbated by increased silting of the river, given the sandy soil, which could further increase the flood heights. There is also concern about the potential for increased flash flooding to occur within the Estate and Garden with such a significant amount of vegetation removed.

Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-03-11 11:53:07

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

First name:

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

A2 Client Details if applicable

Title:

First name:

Last name:

Job title (where relevant):

Organisation or affiliation (where relevant):

A3 Contact Address Details

Same as details provided in A1

Name:

Address Line 1:

Address Line 2:

Address Line 3:

Address Line 4:

[Redacted]

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Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Part C - Issue 2

2a Do you consider that all reasonable alternatives for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

With regard to the Site Assessment Framework table on page 27 of the Soft Sand Site Selection Report, Southern Water, as water and wastewater undertaker for areas under consideration in the Report, request that 'Wastewater' is added to the list of considerations for Services and Utilities.

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

SERVICES AND UTILITIES

Southern Water is the statutory sewerage and wastewater undertaker in the area where these sites are located. We have identified that there is water infrastructure in close proximity to Severals East and Severals West.

This infrastructure needs to be protected so that it can continue to fulfil its function. The infrastructure must not be built over and an easement of between 6 and 13 metres will be required to ensure access for maintenance and/or upsizing purposes at all times. It must be clear of all buildings and substantial tree planting.

If required, diversion of the infrastructure may be possible at the developers' expense, subject to a feasible alternative route being available.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-02-28 15:15:37

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

[Redacted]

[Redacted]

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[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

A2 Client Details if applicable

Title:

First name:

Last name:

Job title (where relevant):

Organisation or affiliation (where relevant):

[Redacted]

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Resident

Other:

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

It's quite simple. As far as extractive industries are concerned, do not initiate any new development, or extend any existing operation that is within the national park. The aim should be to reduce these kind of destructive, finite resource industries within the SDNPA. For goodness sake, what is the point of having national park designation?

Faithfully,

Dr Renalt Capes

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Part C - Issue 2

2a Do you consider that all "reasonable alternatives" for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Tick all the site boxes that apply (above) and provide comments below.:

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Part C - Issue 2

2a Do you consider that all reasonable alternatives for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

I strongly object to the proposed quarries on Severals Road adjoining Midhurst Common. I object because the proposed area supports a variety of rare and national threatened species. In addition, this is a National Park and goes against the principles of National parks throughout the U.K. I also object because I am a local resident who regularly walks through Severals woods and heathland.

I say NO to sand quarries anywhere in the South Downs National Park.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

Part E - About You (The Equality Act 2010)

More questions About You

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Other:

Organiser of local sports and fitness club

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Part C - Issue 2

2a Do you consider that all reasonable alternatives for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Minsted West, Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

The popular Midhurst Milers Running Club have been using The Severals and Minsted Common weekly for over 20 years. On one occasion in 2018 a group of 45 enjoyed a weekday run which took in the exact area planned for excavation.

The natural sand is an ideal, low impact surface for running and the excellent drainage makes Midhurst and Minsted Common perfectly suited to year-round training.

If wellbeing and fitness are a part of the aims and objectives of West Sussex Council and the South Downs National Park then there will be no further excavation of this well-used heathland

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

Part E - About You (The Equality Act 2010)

More questions About You

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Other:

Committee member of Wildlife Group

Any further updates about Strategic Waste or Minerals Planning in West Sussex

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Part C - Issue 2

2a Do you consider that all "reasonable alternatives" for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

habitat.

Active badger setts were within this site plan but alas seem to have been inactive since forestry operations carried out by the estate in 2016. Protected species need to have an undisturbed habitat which for decades the Cowdray estate provided. It seems that the obligation under certain acts to protect the environment are no longer being heeded.

The noise & air pollution will be detrimental to both human & non human residents. Road movements of large HGV's will at some point be travelling through Midhurst itself which is totally incapable of carrying such large regular movements.

Sand is a very unstable structure & drains freely. To upset the layers of land will cause drainage problems & potential other water movement across & through the landscape. Potentially affecting both homes, watercourses, roads, and agricultural land.

There will be loss of amenities to the human population who have been able to enjoy woodland close to their homes for decades.

The works will devalue properties in the area. What compensation does the Cowdray Estate envisage paying? Lord Cowdray is against the fracking close to his home but seems not to care about the detrimental effect his plans to make money will have on others.

Working in the winter months will require lighting which is a blight on any landscape but is also at odds with the dark skies policy of the South Downs National

Park.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

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Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

Part E - About You (The Equality Act 2010)

More questions About You

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Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-03-12 10:08:02

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

A2 Client Details if applicable

Title:

First name:

Last name:

Job title (where relevant):

Organisation or affiliation (where relevant):

A3 Contact Address Details

Same as details provided in A1

Name:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Resident, Local Business

Other:

Progress and consultation on the Soft Sand Review

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

Not qualified to comment

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

Suitable sites not within National Parks or AONBs

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Not qualified to comment

Part C - Issue 2

2a Do you consider that all reasonable alternatives for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

Not qualified to comment

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

Not qualified to comment

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

Not qualified to comment

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Not qualified to comment

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

Soft sand extraction should not include sites within the South Downs National Park as it would have a serious detrimental impact on the environment, natural habitat and an important amenity for people living in the area and visitors to the Park.

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

These proposed quarries would destroy the much loved Severals woods and heathland, which are enjoyed by local residents and visitors. My daughter and her family live close by and the Severals is an important local amenity, where we often enjoy beautiful walks there with our grandchildren.

The noise of heavy machinery would impact local residents. The local roads will be seriously affected by HGVs, making the A272 even more dangerous and will impact Midhurst, which is already heavily congested. The River Rother may also be affected by flooding and contamination.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

Sand excavation sites should not be considered in National Parks or AONB.

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

Outside the National Park area.

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

They are unsustainable in relation to the sustainability of the National Park.

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)?

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)?:

Comments as above - not in National Parks.

Part E - About You (The Equality Act 2010)

More questions About You

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Other:

Member Sandgate Conservation Society / Team leader Storrington Speedwatch

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

I accept that new sites may need to be found within the South-East but object most strongly that sites within the South Downs National Park are now deemed appropriate for consideration. In particular I can find no justification for those sites which, if developed, will mean the permanent loss of irreplaceable and iconic views/rural character etc in this unique landscape. The proposed expansion of Chantry pit in Sullington/Sullington falls very much into this category and must be protected at all costs.

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

Yes.

In particular the movement of Heavy vehicles along unsuitable road systems. i.e. A283

In addition the Storrington area already exceeds the 'permitted' levels of noxious gases particularly from a build-up of traffic moving along the A283 to avoid the A27.

Every recent consultation has focused on attempts to reduce this serious pollution which can only be made worse by agreeing to the expansion of the small worked out quarry at Chantry Lane

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Part C - Issue 2

2a Do you consider that all reasonable alternatives for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

As a trained Geographer I am of course aware that the bands of Upper and Lower Greensand found beneath the chalk escarpments and forming part of the unique structure of the Weald are valuable resources. So are the very limited heathland eco- systems they support and the delightful character they offer visually in an area of outstanding beauty. Such iconic views are rare and any site chosen for expansion must take into account what will be lost.

It would be a tragedy if the unspoilt view at the proposed expansion site at Chantry Lane, Storrington from the A283 southwards towards the classic stretch of chalk escarpment and encompassing the Medieval hamlet and Saxon Church, were lost.

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Chantry Lane

Tick all the site boxes that apply (above) and provide comments below.:

In addition to my observations and concerns set out above I would draw the panels attention to the already difficult and dangerous crossroads where the A283 meets Water Lane. Traffic heading westwards, often on this route to avoid the A27 bottlenecks, now turns right across the traffic to make 'a rat run' along the narrow, winding and unsuitable Water Lane when there is a long built-up of stationary traffic ahead of them waiting to pass through the village centre almost a mile ahead. This now happens many times on a daily basis.

Heavy Goods Vehicles attempting to rejoin the A283 from a new feeder road linking the new expanded pit at Chantry Lane and parallel to the current A283 via

Sullington Lane would create havoc.

The necessary construction of a roundabout at this junction to make safe lorry movements possible from the new site would not solve the problem of extended traffic queues attempting to pass through Storrington one iota. It would merely further increase the already unacceptable level of traffic volume in the village itself which will further increase the illegal levels of pollution recorded.

The visual impact of such a scenario does not bear thinking about. A rare, delightful and totally unspoilt outlook would be permanently lost.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

Part E - About You (The Equality Act 2010)

More questions About You

[Redacted text block containing multiple lines of blacked-out content]

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Part C - Issue 2

2a Do you consider that all reasonable alternatives for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

I object to the Cowdray Estate proposal for sand quarries in Severals east and west. This proposal is detrimental to the local area and will have a negative impact on the National Park as well as local residents who use this area regularly for leisure pursuits such as walking. In fact the proposed site cuts right across The Serpent Trail which is promoted by Natural England and the South Downs Joint Committee. The roads around Midhurst are already crumbling due to excess heavy traffic and this proposal will increase the problem and cause noise which will be heard by local residents and pollution. The rural roads which will be used including Severals road cannot handle heavy lorries. There is also a worry that there will be flooding and contamination of the River Rother. This is a totally unsuitable site for a quarry.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

No

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

No

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)?

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)?:

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Part C - Issue 2

2a Do you consider that all reasonable alternatives for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Tick all the site boxes that apply (above) and provide comments below.:

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

Part E - About You (The Equality Act 2010)

More questions About You

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Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

Please do it go ahead with this excavation

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

The trade off for profit; environment, recreation, health and wellbeing, congestion, lost productivity

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Yes. Don't do it

Part C - Issue 2

2a Do you consider that all reasonable alternatives for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

No

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

Please don't do it

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

It proceed

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Bunton Manor Farm, Chantry Lane, Coopers Moor, Duncton Common, East of West Heath Common, Ham Farm, Minsted West, Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

Please don't do this desecration of our wonderful countryside. I thought that the national parks should be protected and cherished

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

No

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

As above. Don't

Part E - About You (The Equality Act 2010)

More questions About You

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Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Part C - Issue 2

2a Do you consider that all "reasonable alternatives" for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Chantry Lane

Tick all the site boxes that apply (above) and provide comments below.:

Sandgate Conservation Society opposes any proposal to extend Chantry Lane pit and opposes any proposal to construct a roadway across the adjacent field or to change the use of the existing pit.

Any works to extend Chantry pit and to build an access road across the adjacent land will completely destroy the Downland nature of the eastern approach to Storrington along the A283. At the Public Enquiry into the boundary of the then proposed South Downs National Park it was stated a number of times that this part of the South Downs was quintessential Downland scenery and this was one of the reasons for its inclusion within the South Downs National Park. It was used as a bench mark to identify that the land a short distance east and on the north side of the A283 was of the same nature and which resulted in the boundary being revised to include part of East Clayton Farm. It is not right to allow construction of any sort that would destroy this recognised Downland area.

The area including Chantry Pit and the field across to Sullington Lane is an essential part of the view from the South Downs Way and, more particularly, from the area around Sullington Manor Farm (which includes two Grade II listed buildings and other restored ancient buildings) and the adjacent Parish Church of St Mary's, Sullington (a Grade I listed building). The construction of a permanent roadway and extension of Chantry Pit would destroy this vista. It must not be included any proposals for additional sand pits.

Additional traffic will not be allowed down Chantry Lane to join the A283. Any attempt to move that traffic to the A283 east of the village of Storrington will require an access with considerable earthworks in order to enable large lorries to negotiate the junction.

Any proposal to construct a road directly east to Sullington Lane to allow traffic access to the A283 at the A283/Water Lane/Sullington Lane crossroads would involve converting a quiet country lane into a wider commercial type road. This would destroy the whole nature of the lane and the properties therein, including the classic medieval manorial complex of Sullington Manor Farm at the end of the lane. Also the integration of the new road into the existing A283/Water Lane/Sullington Lane crossroads will require extensive earthworks and probably a roundabout. Both of these would create even more damage to the environment and the view. Sandgate Conservation Society strongly objects to any proposal to construct a roadway across the field adjacent to Chantry Pit extension.

Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-03-16 15:15:10

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

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[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

A2 Client Details if applicable

Title:
First name:
Last name:
Job title (where relevant):
Organisation or affiliation (where relevant):

A3 Contact Address Details

Same as details provided in A1

Name:
Address Line 1:
Address Line 2:
Address Line 3:
Address Line 4:
Postcode:
Telephone number:

Email
Email address:
suepoil24@gmail.com

Resident

Other:

Any further updates about Strategic Waste or Minerals Planning in West Sussex

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Part C - Issue 2

2a Do you consider that all reasonable alternatives for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

These quarries will destroy the beautiful Several woods and heathlands along with all the wildlife and footpaths currently enjoyed by hundreds of people every week. The Severals are in the South Downs National Park which should be protecting and not destroying the natural environment.

If the site is developed there will be increasing numbers of HGV on rural roads and through Midhurst town centre - an area already heavily congested. There will be noise and air pollution from the HGV and the heavy excavating machinery.

The beautiful landscape will be destroyed and the River Rother contaminated by waste.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

Leave the South Downs National Park alone and find sites outside the park.

Part E - About You (The Equality Act 2010)

More questions About You

Age

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Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-03-15 10:21:34

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

mrs

First name:

patricia

Last name:

walker

Job title (where relevant):

Clerk

Organisation or affiliation (where relevant):

Harting Parish Council

A2 Client Details if applicable

Title:

First name:

Last name:

Job title (where relevant):

Organisation or affiliation (where relevant):

A3 Contact Address Details

Same as details provided in A1

Name:

Patricia Walker

Address Line 1:

The Old Post Office

Address Line 2:

South Harting

Address Line 3:

Petersfield

Address Line 4:

Hampshire

Postcode:

GU31 5PU

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Other:

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

The Council is not qualified to answer this question

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

Minerals should not be quarried from a National Park unless there is a proven need to do so. Within the Consultation Document (paragraph 3.10) we recommend options A and C be implemented.

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

The Council is not qualified to answer this question.

Part C - Issue 2

2a Do you consider that all 'reasonable alternatives' for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

Whilst it might be the case that all reasonable alternatives have been considered, we would draw your attention to our answer to issue 1B

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

The Council has no comment

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

The Council is objecting to the proposed new site east of West Heath Common, West Harting and have no comments to make on the benefits or otherwise of the other proposed sites.

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

The Council is not qualified to comment.

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

Please see responses to questions 1B and 2A

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

East of West Heath Common

Tick all the site boxes that apply (above) and provide comments below.:

West Heath Quarry, West Harting, Petersfield, Hants.

Harting Parish Council OBJECTS to the new site that is being proposed ½ km east of the existing quarry at West Heath, West Harting.

The access to this new site is a predominant worry. The only access to the existing quarry is from the A272 thence over a single-track road via the narrow 'Durford Bridge' to the quarry entrance, a distance of some 700 metres. This road known as Durford Lane provides access to residential properties and offices at Durford Mill, also properties at Ryefields and West Harting, and in the near future, a visitor facility at Sky Park Farm. Just 500 yards south of the quarry entrance Durford Lane becomes subject to a weight and width restriction.

On 14th February 2019 conditional planning permission was given for a sizeable recreational facility to be created at Sky Park Farm, formerly Rival Lodge Farm (SDNP/18/03926/FUL). Sky Park Farm is located on the opposite side of Durford Lane to the quarry and the permission was granted in the knowledge that it would create a large percentage increase in the amount of vehicular traffic using the same route as the quarry from the A272. At the SDNPA planning meeting Harting Parish Council drew the committee's attention to the soft sand consultation, and the potential for a further long-term increase in traffic should the West

Heath Quarry be allocated for sand extraction. This allocation would be in conflict with SDNPA Local Plan policy SD21.

A further concern is the impact of the continuing use of Grade II listed Durford Bridge by heavy traffic. Constructed in the 14th century, it is one of very few Ancient Monuments within Harting Parish. Sand lorries, especially 40 tonners, have difficulty in navigating the bridge as it is only 3.35metres wide and there is a sharp bend on the southern end of the bridge. The bridge was designed for pedestrians and horse drawn vehicles, and although reinforced in 1924, it and the adjacent roads are entirely unsuitable for handling the size and weight of modern sand lorries. (see photos by copying and pasting the following link to your browser -<http://s3.spanglefish.com/s/7534/documents/consultations/durford-bridge-compressed.pdf>).

This is borne out by the number of occasions in recent years when maintenance and damage to the bridge have caused it to be closed. On these occasions quarry traffic has had to use the only alternative route, southwards through the centre of the village of South Harting via West Harting, ignoring the width and weight restrictions. This causes general chaos on the narrow roads, especially in North Lane and the centre of South Harting and West Harting Street, and lasting damage to the totally inadequate minor road network. If in the future West Sussex County Council were to deem the bridge unusable, how could sand extraction continue?

The Serpents Way long-distance path uses this bridge and more than 500m of the road either side of it, as far as the junction with the A 272. This would put pedestrians in conflict with heavy lorry traffic serving a new site at West Heath, which could be considered contrary to the Second Purpose of National Park designation.

The proposed new site does not adjoin the existing quarry workings but is located some 500 metres to the east of the eastern edge of it. The sand would therefore either have to be moved by a conveyor or link road, both of which would have an undesirable visual and noise impact on open countryside crossed by a public right of way. The site is currently flat pasture fields adjoining an environmentally important wet woodland, formerly Blackrye Pond. It is also adjacent to the route of the former Midhurst/Petersfield Railway line to the north-east, and a stream to the south. The railway line is protected as the preferred route of the Petersfield/Pulborough cycleway (SDNPA Local Plan policy SD20). Unlike the existing quarry which is other than from views from the South Downs largely hidden in a bowl, the site is exposed and would consequently be very visible not only from the South Downs but also the more immediate surrounding area.

The site is stated to be 14ha. However, 3.26ha of the proposed site (OS3421 and 5225) is water meadow and incapable of being worked as it floods regularly. (The attached OS map indicates the area of water meadow). The proximity of this wet area to the rest of the site indicate that even quite shallow excavations would be prone to flooding.

Former Blackrye Pond, the adjacent wet woodland which adjoins the site, is an important nesting place for tawny owls, buzzards, woodcock, mandarin ducks and other species of duck, and a habitat for badgers. Within 100 metres to the south is an existing and regular nesting site for ravens.

The stream is the southern boundary of the site and is important, not only for its flora and fauna, but drains a wide area, especially in periods of prolonged rainfall. Within its waters are fish which include wild brown trout, common carp, eels, and the occasional sea trout. It is a spawning ground and fish use it to access West Harting Pond. Otters have been recent visitors, encouraged by SDNPA. The stream joins the River Rother, which is the source of drinking water for a wide area. The proposed site and surrounding area supports a wide range of reptiles, though there is no indication that this has been taken into account.

Pollution of this stream and other neighbouring watercourses is a grave concern as the water table of the site proposed for sand extraction is naturally high, and as indicated parts of the identified site are often under water during the winter months. In recent years floodwater has been pumped from the existing quarry for about four weeks, into ditches 400 metres from the site on the last occasion. Should the proposed workings flood there would be nowhere for the flood water to be discharged except into the stream with environmentally disastrous results for the stream and the river Rother. When this occurred at Pendean Quarry some years ago, the resultant discharge of sand in solution had a very detrimental impact on Costers Brook and the River Rother.

As indicated already, the sand from the proposed site would have to be transported more than 800 metres back to the workings within the existing quarry where it would be graded and prepared for transportation. As a result it would cross open farmland that is nothing to do with the site, and the only remaining north/south footpath, which is part of the well-used 'Serpent Way' which would be severely compromised or lost. The other two historic north/south footpaths have already been lost, swallowed up by the existing workings. These two footpaths are scheduled to be replaced by rights of way through a landscaped area within the existing quarry as part of the reinstatement scheme that was agreed when the quarry was extended under application WSCC/031/10/HT in 2010. The grading and loading of sand from the proposed new site, to the east of West Heath Quarry, would prevent this agreed enhancement scheme from being carried out for a very long time if at all. That would be contrary to the conditions that were put on the 2010 permission. The South Downs Joint Committee planning committee discussed this aspect of the application at the time and were very supportive of it because of the opportunity it gave for public enjoyment of an important part of the area of what was to shortly become the South Downs National Park. If the new site to the east of the existing workings was allocated it would have a severe adverse impact on the public enjoyment of the area.

Harting Parish Council strongly urges the SDNPA to exclude the NEW SITE east of West Heath Quarry from their Mineral Plan on policy, environmental, safety and a number of community grounds.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

No

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

No

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

No, the Council is not qualified to answer this 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)?

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)?:

No, the Council is not qualified to answer this question

Part E - About You (The Equality Act 2010)

[Redacted]

[Redacted]

[Redacted]

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WEST SUSSEX SOFT SAND REVIEW: PARISH COUNCIL RESPONSE**1. PART A: Personal information****A.1. Personal details**

- a. Name: Neil Ryder
 b. Job Title: Clerk
 c. Organisation: Trotton with Chithurst Parish Council

A2. Client details

- d. Not applicable

A3. Contact details

- e. Address: Steps, Trotton, West Sussex, GU31 5EP
 f. Email (preferred): [REDACTED]
 g. Telephone: [REDACTED]
 h. Category: Parish council

I DO NOT wish to be notified of the following.

Any further updates about Strategic Waste or Minerals Planning in West Sussex

2. Introductory Remarks

This response was unanimously approved by the council members at a meeting of the Trotton with Chithurst parish council on the 13th March 2019. At that meeting it was also agreed it should be forwarded by email to mwdf@wstsussex.gov.uk as the parish council's response to the Soft Sand Review Consultation

"The Community Planning Toolkit" issued by the South Downs National Park states "*National Parks are considered to be the nations finest landscapes They are extensive tracts of countryside that have been given strong protection – under legislation and the planning system – for the conservation and enhancement of their special qualities*" The Parish Council is therefore at a loss to understand how the extraction of up to 4 million tonnes of soft sand from quarries at Severals East and or West and Minsted and its permanent adverse impact on the Wildlife and Amenity value of the Heathland and Woodland together with the associated noise and damage to air quality and the approach roads by the lorries transporting the sand is in anyway compatible with the conservation and enhancement of the special qualities of the South Downs National Park This is more so because it is at least arguable there is with existing sources sufficient soft sand available for the next 10 years and other sources outside the National Park, such as sand from quarries in Surrey or Marine dredged sand from the West Sussex coast are not given proper consideration Thus, there are no exceptional circumstances which would justify the quarrying of soft sand in the South Downs National Park

Further the Parish Council are also very concerned regarding the damage which would be caused to Trotton Bridge which is a Grade 1 Listed excellent example of a medieval Sandstone 5 Arch bridge Possibly built as early as the 14th century and no later than the 16th century Whilst many such bridges were built there are now fewer than 200 left in the country Whilst bridges and roads can survive being driven over by cars and other light vehicles, heavy vehicles such as laden tipper trucks will cause significant damage in a short time. The bridge is of course not designed to take heavy lorry traffic. A few years ago as lorry traffic on the A272 increased in part due to the failure to improve the A27, the surfacing of the bridge started breaking up, eventually resulting in extensive repairs It is now once again showing signs of distress and needs further repair This appears to be happening more frequently as the lorry traffic increases. The extra lorry movements both in and out of the Severals (estimates vary between 100 and 200 a day) will inevitably result in further damage to the bridge surface and ultimately the structure and require more frequent and extensive repair Also the approach to the bridge particularly from Midhurst is less than ideal, being both narrow and with sharp bends and this can result in lorries straying into the oncoming traffic It is an accident waiting to happen Further the vibration from heavy lorries particularly when bouncing over dips, manhole covers or potholes can cause the adjacent houses to shake and vibrate, with the potential for causing structural damage

The above are the main reasons why the Parish Council is opposed to soft sand quarrying at Severals East or West and Minsted. Further particulars, where necessary, are provided in the answers given below to the questions posed in the West Sussex Soft Sand Review: Issues and Options.

3. PART B: ISSUE 1

Question 1A: Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

1 1A-1 House Building Forecast Overestimated

The demand scenarios are completely unrealistic and not based on facts. The scenarios predict a 26% increase in new house building which is based on potential sites identified from local plans. Other statistics or forecasts for actual or predicted new house building starts do not come anywhere near this growth rate.

Long term local forecasts are difficult to find but the Office for Budget Responsibility forecasts predict no increase in new house building nationally until 2023. In 2014 the Department for Communities and Local Government forecast house building in England would remain steady at 210,000 per year until 2039. A recent report showed growth from 2016-17 to 2017-18 to be only 2%. Thus it is likely the growth in housing, if any, is more likely to be minimal. Thus, together with the change in housing construction methods referred to below, the evidence suggests no increase in demand for soft sand.

2. 1A-2 Resource Availability

How up to date and accurate are the resource assessments? The reserve estimates are not publicly available and thus the estimated period over which soft sand may be available from existing sources is unsupported by evidence and is thus not valid for use here.

Question 1B: Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

3 1B-1 Future Soft Sand Requirements

A recent report by the UK Independent Committee on Climate Change (UK Housing: Fit for the Future? Feb 2019) concluded that government targets for greenhouse gas emissions would not be met without widespread changes in housing construction practices. One of the specific findings was the need to improve the focus on reducing the whole life carbon impact of new homes by increasing the use of wood in construction and reduce high carbon materials such as cement, concrete and mortar - and thus soft sand. The new policies to change the way houses are built are already being implemented and their use is increasing. These changes will significantly impact the requirements for soft sand. Thus even if the value of house building increases over the next 10 years it will not result in a pro-rata increase in demand for soft sand.

4. 1C Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/ evidence to support your view.

Yes. As set out above the demand curves are too high. Further and in addition the shortfall is not verifiable from published evidence.

The West Sussex LAA Dashboard 2018 table at the end of the Executive Summary shows that West Sussex has a landbank for soft sand of 7.4 years and may be as much as 9.4 years (Para 2.1.20). As the requirement is for a landbank of at least 7 years this would seem to be adequate (although the MLP inspectors report seems to be suggesting that "at least" means "more than"). However, Table 21 suggests that there is a demand of approx 5.6 mT and reserves of 2.75mT. So where did the 7.4 years landbank come from and why is it different from the demand/reserves estimates provided later in the report? It is noted that these numbers are different from those shown in MM21 of the MLP Inspector's report which suggests a landbank of 10.7 years which is well over the 7 year landbank required.

The summary table on soft sand (page 22) concludes that an additional 1.66 – 2.83mT is needed over the period of the plan to 2033. The next section highlights that West Sussex is a net exporter of 1.82mT. Elsewhere in the report it states that most of these exports are to the London area. The MLP Inspectors report criticises the previous assessment for assuming imports from Kent and Oxfordshire including potential impacts from lorry traffic. And yet this report appears to consider that continued exports to London from inside a National Park with

its associated traffic along much busier routes are acceptable. In addition, the impacts of lorry traffic to London would probably be higher given traffic issues and potential Air Quality Management Areas along the route.

In addition, the large range of numbers used for planning is derisory, e.g. exports range from 42,400 – 275,600mT (14% to 94%) of the quoted demand forecast of 293,737mT. As such, proper conclusions cannot be drawn and does not justify the environmental harm to the landscape. The industry cannot hide behind 'confidentiality reasons' for not producing more accurate data. If the Industry were made to pay the true cost of damage to the environment, this 'justification' would never be accepted – the SDNPA should lobby accordingly.

- With up to 94% of sand & gravel being exported out of West Sussex there is no correlation with house building in West Sussex as a driver for growth in demand.
- The data does not support the inspector's statement (para 30) about the 'strategy to rely on imports from surrounding authorities', indeed the opposite is true.
- Para 31 of the inspector's report recognises the 'significant adverse effects in terms of transport' yet up to 27% of the sand gravel is being exported as far as Buckinghamshire that borders Oxfordshire.

4. **PART C: ISSUE 2**

5 Question 2A Do you consider that all 'reasonable alternatives' for soft sand supply have been identified or are there other options that we should be considering?

The existing sand quarry at Minsted may be a source of further reserves. Further work needs to be done on a more accurate assessment of current reserves and potential.

6 Question 2B Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

References made throughout comments

7 Question 2C. Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

The only reasonable option is E – a combination of alternatives (marine dredged), supplies within West Sussex and supply from outside West Sussex. The preferred strategy needs to reflect this.

8 Option D - Marine provides the least environmental impact and the most reasonable sustainable solution. The understanding of the use of marine dredged sands appears very weak with statements in the consultation document such as

- 2.2.1 states that marine won sand and gravel is not considered a viable substitute and yet Para 2.2.9 of the LAA states that mortar manufacturers in the south east may be using marine won sand in the products in place of soft sand. The use of marine won sand is more common in other parts of England,
- para 3.20 'it is not known if this material is being blended with other, land-won sand, or is a direct substitute'. This needs to be known!
- Para 3.23 states that 'the industry may be turning towards utilising more of this resource'. Why is this not known?

9. Option C

As stated earlier, the demand data is so poor with potentially 94% being exported out of West Sussex, including 27% to Buckinghamshire, that if the harm from transport is being properly considered then these practices should be discouraged by reducing the amount produced in West Sussex.

The sands are what define the habitat that resulted in the inclusion of this area north of the Downs in the SDNP. To remove the sands would destroy the habitat around Midhurst that defines the SDNP ("Heart of the South Downs National Park").

10 Question 3: Do you have any comments on the draft Sustainability Appraisal of the Options? There is nothing sustainable about minerals extraction. Once it is removed, it is gone and cannot be reinstated, but instead leaving a lake or pond and a wasteland behind and so it is in no way sustainable. What this report and many other reports on sustainability refer to is ensuring efficient operations with impacts as low as practicable. The report itself is confusing and littered with errors and in any event will not result in the areas being reinstated as they once were but at best aims to minimise the environmental damage.

An SEA must identify the key environmental hazards that may result from mineral extraction. I do not see this anywhere in the report and thus is not fit for purpose.

5. **PART D: ISSUE 3**

11 Question 4: Do you have any comments on the methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Most National Park Authorities (NPAs) are Mineral Planning Authorities (MPAs) and are expected to identify areas where mineral resources are known to exist. However, unlike other MPAs, they are not expected to identify areas where planning permission might reasonably be expected (known as Areas of Search or Preferred Areas). Thus the whole site selection process does not fit within this framework.

The Issues and Options Consultation sets out 5 site selection principles:

- Places where there are opportunities to restore land beneficially
- Places without a sensitive natural or built environment and away from communities
- Sites that have a good access to the Lorry Route Network
- The need to conserve and where possible enhance protected landscapes in the area
- A preference for extensions to existing sites rather than new sites, subject to cumulative impact assessments

It would have been very useful if the reports assessed how each of the sites met these strategic principles. The sites adjacent to Trotton do not satisfy these principles, as

- They have undergone extensive habitat improvement over the past years with significant sums of money invested
- They occupy sensitive heathland sites which are one of the key habitat types identified in establishing the boundaries of the SDNP and are adjacent to existing housing
- A local lorry route is relatively close but access is dangerous, it would be unable to handle what is estimated to be up to 200 lorry movements per day and there are significant restrictions due to road size to the west, such as Trotton Bridge as referred to earlier and AQMA's to the east and south
- Removing the sand would completely destroy the heathland habitat with no possibility of conserving or enhancing (the assessment suggests a completely unnatural restoration of broad-leaved woodland and interlinked ponds which is definitely not in keeping with the area)
- The sites have a high potential for significant cumulative impacts

As the sites do not fit the 5 basic principles then there is little point in going through all of the extended detail outlined in the other reports.

12 Question 5: Do you have any comments on the 9 shortlisted sites identified in the Consultation Document? Comments provided on Severals East and Severals West attached at the end of this document.

13 Question 6: Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

None at this time.

14 Question 7: Are there any sites we should be considering that are not included in the Site Selection Report (4SR)?

Yes marine sources and sources outside of West Sussex. See previous comments above.

15 Question 8: Do you have any comments on the sustainability appraisal of the potential sites? Dealt with under Q3?

16 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 sites?

There is nowhere with the various reports which contain demonstration and definition of the exceptional circumstances that would make minerals development within the South Downs National Park acceptable. The site selection process cannot continue until the question of exceptional circumstances has been resolved. The MLP Inspector raised the issue of "exceptional circumstances" but in reopening this review his report stated that "there is the potential, in the future, for exceptional circumstances" (Para 15). That means that no exceptional circumstances exist at present and therefore mineral development in the SDNP is not acceptable. The inspector seems to be going against policy by ignoring the exceptional circumstances criteria for selection of sites within the SDNP. This should be the key requirement before considering mineral extraction within the SDNP.

17 NB Site Specific Comments on Severals East and West are available on request

Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-03-18 21:24:21

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

A2 Client Details if applicable

Title:

First name:

Last name:

Job title (where relevant):

Organisation or affiliation (where relevant):

A3 Contact Address Details

Same as details provided in A1

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Resident

[Redacted]

[Redacted]

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

I have no knowledge of the extent or facts available so I am unable to comment.

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

No -

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Due to the Government's housing policy which is likely to increase the demand for soft sand over the period under review, I think that it is imperative that greater use is made of dredged material.

It is wrong in principle to permit quarrying of any significant scale within the National Park. The quarrying of soft sand on a large scale will destroy the landscape of the green-sand hills within the National Park and once this has taken place it cannot be replaced. The National Park has been created to preserve the landscape and its fauna and flora so that it can be enjoyed by generations as yet unborn and once it is lost it is gone forever.

It would therefore be far better to find sites outside of the National Park from which to source soft sand.

Part C - Issue 2

2a Do you consider that all "reasonable alternatives" for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Tick all the site boxes that apply (above) and provide comments below.:

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

Part E - About You (The Equality Act 2010)

More questions About You

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Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

cannot comment

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

no comment

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Please see comments on form submitted unintentionally previously ref.

ANON-2TKJ-4111-2

Part C - Issue 2

2a Do you consider that all "reasonable alternatives" for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

See previous submission if you received it.

More use should be made of dredged material

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

Object in principal to the despoliation of land within the National Park. Defeats purpose of designating the area as a National Park which is there to conserve the environment for generations as yet unborn. All large scale excavation for building materials/soft sand (etc) should take place in places outside the national parks and areas outstanding natural beauty.

The options identified destroy permanently large parts of the low green-sand hills , woodlands and natural habitats which, when they have gone can never be replaced (unlike commercial forestry which does not, in itself, prevent land from reverting or being restored to its original state over time).

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

The options which are further away from the larger communities, villages and towns such as Steyning, Ashington, Storrington, Pulborough, Fittleworth, Pertworth, Midhurst, Rogate and Petersfield are preferred. The amenities of these larger communities must be preserved as far as possible especially in respect of their immediate environment and recreational space for cycling, walking etc.

The movement of bulk transportation vehicles should be given greater thought especially in respect of access to and from the extraction site/s . It is very important that heavy vehicles are kept away from the centres of all of these communities which are at the very heart of the National Park. At present Midhurst and Rogate in particular have a huge problem with HGVs and particularly bulk materials delivery and rubbish removal lorries which quite ruin these otherwise tranquil communities. This problem will be much exacerbated if sand extraction is permitted at The Severals. The A272 and the A286 should not be used as through routes for these vehicles.

The effect of industrial quarrying /sand extraction on communities within a radius of, at the very least, one mile (if well screened, much more if not) must be given very serious consideration. The problems of dust, noise (including traffic noise), loss of visual amenity are real threats in such places and they have a dramatic effect on property values and on the health and well-being of the community.

We therefore believe that The Severals (east and West) should be deleted from the list along with the extension of sites adjacent to Storrington and Ashington. The sites at East of West Heath Common and at Buncton Manor farm seem relatively suitable but we have reservations about the latter due to the and we note that Buncton Manor Farm will be visible from Chanctonbury Clump. Ham Farm is very close to Wiston and the A283 and the area adjoining the main east/west and north/south routes into and through the National Park should be protected.

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

Insufficient attention paid to highways and traffic in connection with the options listed.

A272 is not suited to heavy traffic by bulk transport (40 tonne vehicles).

To the west of Midhurst Trotton Bridge is a Grade 1 listed ancient monument controlled by traffic signals. Midhurst should of course have a by-pass but doesn't have one.

In Midhurst itself the streets are extremely narrow and unsuited to HGVs. North Street, Rumbolds Hill are extremely dangerous and frightening for pedestrians. Cars have to give way to HGVs and busses in Rumbolds Hill which in places is less than 20 feet wide almost without a pavement on one side. North Mill Bridge requires single carriageway working when it is being used by HGVs. North Street should be a tranquil pedestrianised street; instead it is a noisy street full of exhaust fumes and traffic queues. The "heart of the National Park"?

In Rogate the bend in the main street cannot be navigated by cars and HGVs simultaneously. To the south the sharp bend/s in Singleton are also unsuitable for HGVs. This part of the A272, from Rogate to Pulborough should never be used by bulk transport 40-tonne lorries.

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Bunton Manor Farm, Chantry Lane, Coopers Moor, Duncton Common, East of West Heath Common, Ham Farm, Minsted West, Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

We know several of these sites quite well. I have lived most of my life in West Sussex or in southern Surrey (Storrington, Hove, and now Midhurst). In my view the least injurious overall order are:-

- 1) East of West Heath Common
- 2) Minsted West
- 3) Ham Farm (too close to the A283 and Wiston Park)
- 4) Chantry Lane (too close to the built-up area of Storrington)
- 5) Bunton Manor Farm (may be too close to the Wiston village and historic buildings)
- 6) Duncton Common (major highway/traffic problems)
- 7) Coopers Moor (major highway/traffic problems)
- 8) Severals West - SHOULD BE REMOVED FROM LIST- it is too close to the town and would be a disaster for local residents in Severals Road and Lower Bepton/Bepton Road Midhurst
- 9) Severals East - SHOULD BE REMOVED FROM LIST for the same reasons. These last two options would have a disastrous effect on the local amenities and would undoubtedly lead to legal disputes and substantial claims against the operators, the landowners and the other authorities.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

See above

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

Yes, plenty but they would probably have to be compulsorily purchased and all would be outside of the National Park boundary!

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

Good document but falls short of perfection for the reasons stated elsewhere in his response.

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)?

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)?:

See the comments regarding transportation of bulk materials, roads and traffic, loss of amenities etc., also my over-arching objections to the despoliation of land within the National Park.

The South Downs National Park will become an irrelevance if this type of quasi-industrial development is allowed within its boundaries.

Part E - About You (The Equality Act 2010)

More questions About You

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█

█ (part 2)

█

█

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

Yes: the climate emergency

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Yes: much less.

Intergovernmental Panel on Climate Change Global Warming of 1.5 °C

Part C - Issue 2

2a Do you consider that all 'reasonable alternatives' for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Ham Farm

Tick all the site boxes that apply (above) and provide comments below.:

Fully support the objections given by Steyning Parish Council (SPC).

In addition to the flaws present in the 2015 Transport Assessment identified by SPC, I also note that the A283 carriageway width is stated as 6.2m in para 12.2.2 "The A283 is a single carriageway route with a 50mph speed limit with an approximate carriageway width of 6.2m". Yet when it comes to assessing road capacity via TA 79/99 in para 12.4.3 a carriageway width of between 6.75m and 7.3m is assumed!!!: "...a carriageway width of between 6.75m and 7.3m, the theoretical capacity of the route based on Table 2 TA 79/99 4 is between 1320 and 1590 vph, which suggests the maximum theoretical capacity is greater than 2031 forecast traffic flows." At 6.2m, TA 79/99 suggests 1020 vph, indicating that, as many users will testify, the A283 is already over capacity to a dangerous extent at peak times.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

Part E - About You (The Equality Act 2010)

More questions About You

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Submitted to **Soft Sand Review of the West Sussex Joint Minerals Local Plan (2018)**
Submitted on 2019-01-21 15:40:53

Consultation Response Survey

Part A - Personal Information

A1 Personal Details

Title:

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Job title (where relevant):

Organisation or affiliation (where relevant):

A2 Client Details if applicable

Title:

First name:

Last name:

Job title (where relevant):

Organisation or affiliation (where relevant):

A3 Contact Address Details

Same as details provided in A1

Name:

Address Line 1:

Address Line 2:

Address Line 3:

Address Line 4:

Postcode:

Telephone number:

Email

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Resident, Parish/Town Council

Other:

Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

1

We don't want a concrete Sussex!

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

Realities beyond a 15 to 20 year horizon.

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Part C - Issue 2

2a Do you consider that all 'reasonable alternatives' for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

Yes

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

Option B. Why should others suffer for a West Sussex policy. Equally, soft sand excavation already takes place in the NP, so should continue.

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

Only in respect of the transport assessment referred to in the 4SR

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Ham Farm

Tick all the site boxes that apply (above) and provide comments below.:

West Sussex Minerals Local Plan Addendum Transport Assessment

Ham Farm

October 2016

West Sussex County Council

States in para 2.4: "Based on a carriageway width of between 6.75m and 7.5m, the theoretical capacity of the route based on Table 2 TA 79/99 1 is between 1320 and 1590 vph..." In places between Ham Farm and Washington the carriageway width is less than 6m, and it is these places that will restrict capacity to 1020 vph or less (TA 79/99). This also shows that the A283 is already at or exceeding capacity at peak times without any additional HGV traffic.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

No

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

No

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

No

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)?

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)?:

No

Part E - About You (The Equality Act 2010)

More questions About You

Age

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Part B - Issue 1

1a Which soft sand demand scenario do you think that the Authorities should use? Please provide reasons for your views.

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

1b Do you think that there are any other matters that should be taken into account when determining the need for soft sand?

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

1c Do you think that the Authorities should plan for a different amount of soft sand to 2033? Please provide information/evidence to support your view.

Do you think that the Authorities should plan for a different amount of soft sand to 2033?:

Part C - Issue 2

2a Do you consider that all reasonable alternatives for soft sand supply have been identified or are there other options that we should be considering?

Please provide reasons for your views.:

2b Do you have any comments on the options that we have identified and the contribution that they could make to meeting need to 2033?

Options comments:

2c Which option or options should we take forward as part of the preferred strategy to meet the identified shortfall for soft sand? Please give your reasons.

Please give your reasons.:

3 Do you have any comments on the draft Sustainability Appraisal of the options?

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

Part D - Issue 3

4 Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?

Do you have any comments on the site selection methodology, as set out in the Soft Sand Site Selection Report (4SR)?:

5 Do you have any comments on the nine shortlisted sites identified in the consultation document?

Severals East, Severals West

Tick all the site boxes that apply (above) and provide comments below.:

Choosing the Severals East and Severals West sites would mean:

Destroying a wildlife haven and corridor for many years ahead.

Increased pollution in a National Park from lorries.

Increased traffic in an already struggling road network, local roads are simply not suitable for that amount of heavy lorries it would make them unsafe.

Noise pollution.

Loss of a well used and loved recreation area.

6 Do you have any comments on the 12 non-shortlisted sites, as identified in Appendix 3 of the Soft Sand Site Selection Report (4SR)?

non-shortlisted sites:

7 Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?

Are there any sites that we should be considering, that are not included within the Soft Sand Site Selection Report (4SR)?:

8 Do you have any comments on the Sustainability Appraisal of the potential sites?

Do you have any comments on the Sustainability Appraisal of the potential sites?:

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)?

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)?:

Part E - About You (The Equality Act 2010)

More questions About You

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