

Report to: Governance Committee

Date of meeting: 20 September 2019

By: Director of Communities, Economy and Transport

Title: Amendment to Constitution – Scheme of Delegation to Officers

Purpose: To seek approval to add to and amend the Scheme of Delegation in relation to functions delegated to the Director of Communities, Economy and Transport that are concerned with Local Plans.

RECOMMENDATION: The Governance Committee is recommended to recommend the County Council to agree to amend the Scheme of Delegation to Officers as set out in Section 2 of the report.

1 Background Information

1.1 The County Council's Scheme of Delegation provides the Director of Communities, Economy and Transport with authority to perform a number of functions and make certain decisions across the range of services that make up the directorate. Some of these functions concern the work that the County Council undertakes in producing and reviewing a Waste and Minerals Local Plan for the county. Some of the functions also concern the input that the County Council provides, particularly through our statutory planning consultee roles, in the development and review of Local Plans produced by other planning authorities (particularly the District and Borough Council's in the county).

1.2 Over recent years, the Government has made it clear that they are concerned with the time it takes for Local Plans to be produced. Various measures have been introduced to attempt to address this concern, one of which has been the requirement for planning authorities to prepare Statements of Common Ground with other parties, which are seen as a way of addressing cross-boundary strategic planning matters and demonstrating compliance with the Duty to Co-operate. This requirement has been set out in the Government's National Planning Policy Framework (NPPF)¹.

1.3 The County Council will be expected to secure Statements of Common Ground in support of our own Waste and Minerals Local Plan. We will also be asked to agree Statements of Common Ground that support plans prepared by other planning authorities. These instances will generally relate to the County Council's roles as Highway Authority, Lead Local Flood Authority and/or a neighbouring County Planning Authority. It is anticipated that other authorities will often request the County Council's agreement to a Statement of Common Ground at relatively short notice, particularly when responding to matters raised by a Planning Inspector for a Local Plan Examination. It should be noted that Statements of Common Ground will not be setting policies for Local Plans. Instead, they will be articulating factual evidence and/or previously stated position(s) on the Local Plan in question. An example of a Statement of Common Ground was the recently agreed statement between East Sussex County Council (as Minerals Planning Authority), Kent County Council, West Sussex County Council, Brighton & Hove City Council and the South Downs National Park Authority on the matter of planning for the supply of soft sand in this region. The County Council agreed this Statement following a report to the Lead Member for Transport & Environment in May 2019. Appendix 1 includes this Statement in order to provide an example of how they could be set out and the type of content they could contain.

1.4 To allow for Statements of Common Ground to be agreed and signed by the County Council in a timely manner, it is proposed to introduce a further delegated power into the Scheme of Delegation (as detailed in the next section of this report). Some further minor changes are also proposed to the Scheme of Delegation, which are also detailed in the following section.

¹ See paragraphs 24 to 27 of the NPPF;

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

2 Proposed amendments to the Scheme of Delegation

2.1 In light of the above, it is proposed to add the following paragraph to Table 6 of Part 3 of the County Council's Scheme of Delegation. This will follow on from the current paragraph 38, which is within the sub-section entitled "*Development Plans and Consultation*".

"39. To consider, agree and sign Statements of Common Ground that are prepared in support of Development Plans by both the County Council and other planning authorities."

2.2 Paragraph 40 of the Scheme of Delegation provides delegated authority to respond to consultations from government departments and other statutory and non-statutory organisations. However, this is only within the context of the County Council's role as County Planning Authority. There have been and will be times when the County Council, within its statutory planning consultee roles, also wishes to respond to such consultations (e.g. updates to the National Planning Policy Statement, consultations issued by the likes of the Environment Agency, etc). More often than not, these consultation periods are only for around 6 weeks, meaning that it is often not possible to submit a response to the consultation that has been formally approved by a Lead Member decision. In light of this it is proposed to amend paragraph 40 as follows (additional text underlined).

"40. To respond on behalf of the Council as County Planning Authority, Highway Authority and/or Lead Local Flood Authority to consultations from government departments and other statutory and non-statutory organisations."

2.3 Paragraph 21 of the Scheme of Delegation concerns applications for Prior Approval, which may in some instances be required in order for certain developments/works to exercise their Permitted Development rights. An application for Prior Approval has a limited scope for the matters that the planning authority can consider. To date, few such applications have been received by the County Planning Authority. At present, the Scheme of Delegation makes specific reference to certain parts of the legislation that could result in an application for Prior Approval. However, this is not exhaustive and therefore to ensure that all such applications are captured in the Scheme of Delegation, it is proposed to replace paragraph 21 with the wording set out below, which is consistent with the criteria that determines whether a planning application is referred to the Planning Committee, or not.

"21 a) To determine whether an application for prior approval is required under Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.

b) To determine, where there are less than two objections relating to matters that can be considered by the County Planning Authority under Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015, applications for prior approval under the aforementioned legislation.

3. Conclusion and Reason for Recommendation

3.1 It is considered that the additions and amendments proposed to the the Scheme of Delegation, are necessary in order for the County Council to effectively respond to legislative and policy changes and do not undermine the democratic accountability of the Council. Some of the amendments will aid in the ability for decisions to be taken in an efficient and timely manner, which is considered particularly important where deadlines need to be met for certain actions to be undertaken.

RUPERT CLUBB

Director of Communities, Economy and Transport

Contact Officer: Edward Sheath

Tel. No. 01273 481632

Email: edward.sheath@eastsussex.gov.uk

LOCAL MEMBERS

ALL

BACKGROUND DOCUMENTS

None

Appendix 1 – An example of a Statement of Common Ground.

Statement of Common Ground (SoCG) on Soft Sand between Kent County Council, West Sussex County Council, East Sussex County Council, Brighton & Hove City Council and the South Downs National Park Authority

April 2019

1.0 Background and Parties Involved

1.1 The National Planning Policy Framework (NPPF) states that: “Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.” And “Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans.”

1.2 NPPF expects that Local Plans will include ‘non-strategic’ and ‘strategic’ policies, and explains that strategic policies should “.....set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:.....infrastructure” and this includes “for... provision of minerals”.

1.3 Kent County Council (KCC), East Sussex County Council (ESCC), West Sussex County Council (WSCC), the South Downs National Park Authority (SDNPA) and Brighton & Hove City Council (BHCC) (collectively described as the Authorities) are Mineral Planning Authorities (MPAs) in close proximity, responsible for preparing minerals planning policies concerned with the development of minerals supply facilities in their areas (See Figure 1).

1.4 KCC adopted its Minerals and Waste Local Plan in July 2016 and is preparing a subsequent Minerals Sites Plan. The quantum of need for soft sand set out in the adopted Plan is based solely on the average of the previous 10-year sales of the mineral from sites in Kent.

1.5 WSCC and the SDNPA adopted a Joint Minerals Local Plan (JMLP) in July 2018. Policy M2 of the JMLP requires the Authorities to undertake a single issue Soft Sand Review (SSR) that addresses the shortfall in soft sand to the end of the Plan period (to 2033).

1.6 ESCC, BHCC and the SDNPA adopted a joint Waste and Minerals Plan in 2013, that includes strategic and development management policies. The plan’s Local Strategy Statement: Provision and Use of Aggregates ~~plan~~ recognises that the provision of soft sand is a larger than local issue, and states that the SDNPA is working with ESCC, Hampshire County Council and West Sussex County Council to find an acceptable solution across the ‘wider area’.

1.7 ESCC, BHCC and the SDNPA adopted a joint Waste and Minerals Sites Plan in 2017 for the plan area to 2026 but this plan does not identify mineral site allocations as no requirement was identified in the 2013 Waste and Minerals Plan. ESCC, BHCC and the SDNPA are currently undertaking a review of the adopted Waste and Minerals Local Plan. The review is focusing on the provision of aggregates and Mineral Resources and Infrastructure Safeguarding.

1.8 National Policy states: “In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.”

1.9 This document represents a Statement of Common Ground (the ‘Statement’) between KCC, WSCC, ESCC, B&HCC and the SDNPA and so covers the Plan Areas of

- Kent;
- West Sussex and South Downs; and
- East Sussex, South Downs and Brighton & Hove.

1.10 It is specifically related to the issue of making provision for soft sand in line with national planning policy requirements to ensure that a steady and adequate supply can be maintained.

1.11 The South East England Aggregates Working Party (SEEAWP) is a technical advisory group of mineral planning authorities and other relevant organisations covering the South East and is responsible for producing comprehensive data on aggregate demand and supply in the south east. In line with Planning Guidance, SEEAWP is treated as an additional signatory to this SoCG.

2.0 Geology and Strategic Geography

2.1 Soft sand (also known as building sand) is an important aggregate mineral that, for certain end uses, cannot be substituted by other materials. Soft sand is used specifically in building mortar and asphalt by the construction industry.

2.2 The soft sand resource within the Authority areas is contained within the Folkestone Formation. This formation extends westwards from the north west of Lewes in East Sussex, across West Sussex and into Hampshire to Petersfield, where it swings around to the north east and then continues east across Surrey and Kent, meeting the coast at Folkestone.

2.3 In Kent, soft sand is extracted from quarries situated on the Folkestone Beds between Charing and Sevenoaks. Most of these sand quarries produce a combination of soft sand and silica sand (a specialist sand). The resource is located within and adjacent to the Kent Downs Area of Outstanding Natural Beauty (AONB) (See Figure 1) and this affects the ability to exploit it.

2.4 The soft sand resource in the East Sussex Plan area is not extensive. The area of potential soft sand is entirely located within the South Downs National Park. There is one extraction site (Stanton's Farm Quarry) that has not been active for at least 5 years; supply has been entirely met with imports over this time. The ability to identify additional further resources in the East Sussex Plan area could be affected by its limited extent and the National Park designation.

2.5 In West Sussex, the Folkestone Formation runs east-west through the County and is, again, mainly located within the South Downs National Park. There are a small number of active extraction sites in the west and central parts of the county, which are largely within the National Park. The material within the Folkestone Formation East of Steyning is not known to contain any soft sand that is considered viable for extraction. This is evidenced through a lack of sites being worked historically, coupled with a lack of sites being proposed by the industry in the eastern extent of the resource in Sussex.

2.6 Whilst both Kent and West Sussex contain active extraction sites with permitted reserves of soft sand, there is only one sandpit in the East Sussex Plan area which lies wholly within the SDNP, and has not reported extraction for a number of years. East Sussex County Council, Brighton & Hove City Council and the SDNPA recognise that their plan area has historically been more reliant upon on soft sand supply from other areas. National Policy requires that authorities plan for a steady and adequate supply of aggregate by considering previous sales, taking account of other relevant local information. The sales data collected annually by authorities does not consider the final destination of soft sand, therefore when planning for minerals in Kent or West Sussex, these Authorities are taking account of materials that may have been used in East Sussex and other areas during any specific year within their LAAs. Therefore, in theory predictions of future requirements incorporate amounts for those areas accordingly.

2.7 Figure 1 shows there are good road connections in the South East, in particular the M20, M26, M25, M23 and A24. Railheads exist in Kent, East Sussex, and West Sussex which are used for the transport of aggregates. There are also a number of wharves located on the Kent, East Sussex, Brighton & Hove and West Sussex coast which receive (or potentially could receive) soft sand, whether from land or sea borne sources. There is a history of cross boundary movement of aggregate between these areas (and the wider

south east) as evidenced by monitoring. The movement of aggregates is affected by the availability of aggregate supplies, market demand, and has no regard to the administrative boundaries of the parties to this SoCG.

3.0 The Strategic Issue: Soft Sand Resource, Movement and Supply

National Policy

3.1 National planning policy requires MPAs to plan for a steady and adequate supply of aggregates, and to make provision for the maintenance of landbanks for sand and gravel of at least seven years as calculated by Local Aggregate Assessments (LAAs). LAAs should consider other relevant local information, when calculating demand based on a rolling average of 10 years sales data (NPPF Para 207(a)). National planning guidance says that other relevant local information may include levels of planned construction and housebuilding.

3.2 National policy also states that local authorities should calculate and maintain separate landbanks for aggregate minerals of a specific type or quality which have a distinct and separate market. For aggregate described as soft sand, the landbank to be maintained is seven years (NPPF Para 207(f)).

3.3 Provision for land-won extraction should be made in MPA's mineral local plans, taking the form of specific sites, preferred areas and/or areas of search and locational criteria as appropriate (NPPF Para 207(c)). However, Planning Practice Guidance states that National Park Authorities are not expected to designate Preferred Areas or Areas of Search given their overarching responsibilities for managing National Parks (para 008).

3.4 Paragraph 205 of the NPPF states that as far as is practical, MPAs should provide for the maintenance of non-energy mineral landbanks from outside National Parks, the Broads, AONBs, World Heritage sites, Scheduled Ancient Monuments and Conservation areas.

3.5 Paragraph 172 of the NPPF states that planning permission should be refused for major development in national parks other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Footnote 55 of the NPPF says that the question of whether a development proposal is 'major' in a national park is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined. In any event mineral extraction is considered to be 'major development' as defined in the glossary of the NPPF and the Town and County Planning (Development Management Procedure) (England) Order 2015.

3.6 Paragraph 172 of the NPPF relates primarily to the determination of planning applications. However, to ensure that all local plan allocations are deliverable, it is also necessary to consider the issue of major development at the plan making stage. All potential allocations for soft sand in the National Park are considered to be 'major development' and so will need to address paragraph 172 of the NPPF .

Soft Sand Shortfalls in Kent

3.7 The latest KCC LAA was published in late 2018 and included data for the year 2017.

3.8 The Kent 2018 LAA forecasts a 2.5 million tonnes shortfall during its plan period to 2030 and this to be addressed through the allocation of reserves in the Minerals Sites Plan. The need for soft sand is calculated solely on the basis of the 10-year average sales.

3.9 The calculation of Kent requirements takes account of past sales and so reflects any historical sales that in all probability have been involved in providing supplies to East Sussex. In other words, Kent is planning to supply soft sand at a level which would be sufficient to meet demands to East Sussex if they

were to remain the same. This approach is consistent with that used to inform requirements for soft sand set out in the adopted Kent Minerals and Waste Local Plan.

Soft Sand Shortfalls in West Sussex (including the South Downs)

3.10 The latest WSCC LAA was published in January 2019 and includes data for the year 2017.

3.11 The West Sussex 2018 LAA forecasts a shortfall of between 1.65 and 2.83 million tonnes during the plan period to 2033. This The shortfall (ranged between 1.65 and 2.83 million tonnes) will be addressed through the Soft Sand Single Issue Review (SSR) of the Joint Minerals Local Plan.

3.12 The SSR is currently at Issues and Options Stage (Regulation 18). The Authorities are reviewing the extent of the soft sand resource, the availability of material outside and inside designated areas and the potential impact on the South Downs National Park.

Soft Sand Shortfalls in East Sussex (including Brighton & Hove and the South Downs)

3.13 The latest ESCC LAA was published in early 2019 and includes data for the year 2017.

3.14 The adopted East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan seeks to maintain a 7-year landbank for the extraction of sand and gravel. The Plan area is treated as a special case, recognising the particular circumstances of low production; remote reserves; and a high dependence on marine landings. For this reason, the landbank comprises a combined soft sand and sharp sand amount.

3.15 The East Sussex, South Downs and Brighton & Hove 2018 LAA reported that permitted soft sand reserves amounted to 0.35 million tonnes. With the lack of any sales data for the last 5 years, and confidential and null returns prior to this a 10 or 3-year average cannot be calculated. As referred to previously, the mineral planning authorities are currently undertaking a review of their Waste and Minerals Local Plan.

3.16 Part of the evidence gathering for the Review includes a study of the supply chain for construction aggregates in the Plan area. From the evidence available so far, a proportion of aggregates produced or received in Kent, West Sussex and Surrey are imported to serve the East Sussex and Brighton & Hove market.

Distribution of Supply

3.17 The location of the soft sand resource within protected landscapes (that is, National Parks and AONBs) is making it increasingly difficult to maintain land-won supplies at historic levels from resources not affected by these designations. The South East England Mineral Planning Authorities are agreeing a Joint Position Statement on Soft Sand that sets out the overall supply position within the South East and is designed to underpin statements of common ground between authorities in the South East, such as in this statement.

Kent

3.18 The soft sand resource in Kent follows the Kent Downs AONB. One site has however been identified in the proposed submission draft of the Minerals Sites Plan outside of the AONB that is considered suitable for allocation (Chapel Farm West, Lenham). The yield of this site is 3.2mt. The provision from this site would help meet the calculated shortfall in Kent, as set out in paragraph 3.8 of the Kent Pre-submission Mineral Sites Plan 2019-30 and provide a surplus of 0.7mt of soft sand, available to contribute to the wider regional need.

West Sussex

3.19 The West Sussex Single Issue Soft Sand Review – Issues & Options Consultation (Reg.18) shortlists nine sites with potential for allocation but notes that identification of the potential sites “does not imply that the Authorities consider that they are suitable for development, either now or in the future”. Of the nine sites identified, only two sites are outside of the SDNP, with a combined potential yield of 1.725mt. If the assessments of the sites conclude that they are suitable for allocation, and the authorities were to proceed to allocate those sites, there would still be a further shortfall in West Sussex of just over 1mt of sand. This would likely require an allocation from within the SDNP to meet the shortfalls to 2033. A more detailed technical assessment will inform the final selection of sites for inclusion in the proposed submission document.

3.20 The Authorities (WSCC and SDNPA) have identified the following five ‘reasonable alternatives’ to meet the demand for soft sand:

- Option A: Supply from sites within West Sussex but outside of the National Park;
- Option B: Supply from sites within West Sussex, including within the National Park;
- Option C: Supply from areas outside West Sussex;
- Option D: Supply from alternative sources including marine-dredged material; and,
- Option E: A combination of the above options.

3.21 Following consultation on the Issues and Options, WSCC and SDNPA will develop a preferred strategy and anticipate agreeing this for publication for representations (in accordance with Regulation 19) later in 2019.

East Sussex

3.22 The limited extent of the soft sand resource in the East Sussex Plan area and its location within protected landscapes (that is the SDNP) means that East Sussex (and Brighton & Hove) has been heavily reliant on supplies from other areas.

3.23 Currently Policy WMP2 of the Waste and Minerals Plan addresses potential minerals (and waste) development affecting that part of the SDNP area within East Sussex. Soft sand is specifically referenced in part c). This refers to proposals to extend existing soft sand sites or new quarry proposals within the national park area to conform to a test b) as well as demonstrate that the need could not be practically achieved by extraction in adjoining Counties. Criterion b) of the policy has a negative presumption, in that major development in the national park should not take place except in exceptional circumstances, considering:

- i. The need for the development, including in terms of any national considerations and*
- ii. The impact of permitting or refusing the development upon the local economy; and*
- iii. The cost of and scope for developing outside the designated area or meeting the need in another way; and*
- iv. Any detrimental effect on the environment, landscape and/or recreational opportunities and the extent to which it could be satisfactorily mitigated.*

Development will only be in the public interest if the outcomes of i-iv above gives sufficient reason/s to override the potential damage to the national beauty, cultural heritage, wildlife or quiet enjoyment of the National park.

3.24 The review of the adopted Waste and Minerals Local Plan will examine the options for soft sand provision to meet the needs for East Sussex and Brighton & Hove. This may, or may not, identify sites within the SDNP after a full analysis of the available resources and their deliverability against all relevant material planning considerations. As part of this assessment the mineral planning authorities will be looking to secure supply from existing sources, and with likely growing demand for soft sand.

Soft Sand Reserve Life

3.25 Permitted reserves (as of the end of 2017) across the area of the Authorities can be grouped together into three component parts, given the existing joint working arrangements, as follows:

- West Sussex County Council and South Downs National Park Authority 2.745 million tonnes;
- East Sussex County Council, Brighton and Hove and South Downs National Park Authority 0.350 million tonnes, and;
- Kent County Council 8.848 million tonnes.

3.26 Based on the available average sales data for 2017, West Sussex County Council and South Downs National Park Authority group will exhaust the reserves by 2026, East Sussex County Council, Brighton and Hove and South Downs National Park Authority will continue to maintain reserves due to a lack of sales activity and Kent County Council by 2034. Therefore, it can be concluded that available reserves in the two authority areas where there is an active extraction industry will last into the medium to long term.

3.27 West Sussex County Council is planning to meet needs until 2033, and thus will have a 7-year shortfall to address. While Kent County Council is planning until 2030 (plus 7) so will have a 3-year shortfall to address. Therefore, in order to maintain a steady and adequate supply of soft sand there is no immediate need for further soft sand reserves at this time, though clearly the matter of supply in each MPA area for the entire relevant local plan period is to be understood and planned for in a cooperative manner.

4.0 Agreed Position between the Parties

1. The Parties agree that their planned provision for soft sand will be based on their LAAs where appropriate.
2. The parties agree that, in line with paragraph 205 of NPPF, as far as is practical, provision for the maintenance of landbanks of soft sand should be made outside of National Parks and AONBs.
3. The parties agree that the soft sand resource within their areas may be worked to contribute to the needs of other areas.
4. KCC will plan to meet the identified shortfall within the latest Kent LAA (2.5 million tonnes). The allocation of one site (Chapel Farm (West)) will provide 3.2 million tonnes, which will result in a surplus of 0.7 million tonnes which may contribute to the wider regional need.
5. Any surplus in Kent (established in the Pre-Submission Minerals Sites Plan as 0.7mt) is acknowledged as having potential to meet a wider need in the South East, including that in West Sussex resulting from the constraint on supply from the South Downs National Park. As East Sussex relies on imports from both West Sussex and Kent (and other areas), additional reserves in the market could help meet a steady and adequate supply for the three Authorities in the future, In light of the proximity of Kent to the Plan areas of East Sussex County Council, West Sussex County Council, Brighton and Hove City Council and the South Downs National Park Authority, Kent County Council recognise that it is entirely possible that the proposed surplus of 0.7 million tonnes (see 4 above) could make a significant contribution towards meeting the needs for soft sand supply identified by these other mineral planning authorities.
6. WSCC/SDNPA will plan to meet the identified shortfall (between 1.65 – 2.83mt) that is set out in the West Sussex LAA, taking account of the planned surplus in Kent.
7. ESCC, B&HCC and the SDNPA will plan together to ensure the need for materials in their Plan Area can be adequately planned for.
8. The Authorities will continue to cooperate to ensure that an effective monitoring framework, to account for the surplus sand, is put in place as the Kent Mineral Sites Plan, the West Sussex and South Downs Soft Sand Review, and the East Sussex, South Downs and Brighton & Hove City Council Waste and Minerals Plan Review progress.
9. The Parties will seek to ensure that the matters in the Statement are reflected in the minerals local plans that they prepare.
10. The parties will identify any soft sand resource in their area for safeguarding in their Local Plans
11. The parties will safeguard potential and existing minerals infrastructure, including railheads and wharves, which are or could be used to import and transport soft sand in their Local Plans

5.0 Additional Strategic Matters

5.1 This SoCG should be considered alongside the wider Position Statement concerning the supply of soft sand in the south east, which KCC, WSCC, ESCC, B&HCC and SDNPA are party to.

South East England Aggregate Working Party

Paragraph: 025 Reference ID: 61-025-20190315 of the PPG advises that for minerals plans, aggregate working parties are also expected to be treated as additional signatories in statements of common ground. This SoCG is therefore presented to the South East England Aggregate Working Party (SEEAWP) for their consideration as an advisory body.

6.0 Monitoring and Governance

6.1 The parties to this Statement have worked together in an ongoing and constructive manner. Appropriate officers of each Party to this Statement will liaise formally through correspondence and meetings as and when required.

6.2 The parties will review this SoCG at least every 12 months and establish whether this SoCG requires updating. Specific matters likely to prompt updates of this SoCG include the following:

- Preparation of the preferred strategy for soft sand supply in West Sussex by WSCC and SDNPA (anticipated in July/August 2019);
- Modifications to the Kent Minerals Sites Plan resulting from the independent examination (anticipated in the Autumn of 2019);
- Preparation of the preferred strategy for soft sand supply in the East Sussex Plan area as part of the Review of the WMLP (anticipated in XXXX);
- Evidence set out within the Authorities LAAs, which monitor the supply situation for soft sand, specifically related to the maintenance of seven-year landbanks, reserves, and sales for soft sand;
- The outcomes of SEEAWP meetings.

Signatories

XXXX [insert position], East Sussex County Council

XXXX [insert position], Brighton and Hove City Council

XXXX, [insert position], West Sussex County Council

XXXX, [insert position], South Downs National Park Authority

Sharon Thompson, [Head of Planning Applications], Kent County Council

Additional signatories:

SEEAWP considered this Statement of Common Ground between Kent County Council, East Sussex County Council, Brighton and Hove City Council and the South Downs National Park Authority at its meeting on the 9th April 2019 at the Winchester offices of Hampshire County Council. Notes of the discussion are included as Appendix 1.

Tony Cook, Chair, South East England Aggregates Working Party