

East Sussex, South Downs and Brighton & Hove
Waste and Minerals Local Plan

Waste and Minerals Local Plan Review

Sustainability Appraisal

March 2020



East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan: Revised Policies Document
Sustainability Appraisal (March 2020)

Preamble & Copyright

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East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan: Revised Policies Document
Sustainability Appraisal (March 2020)

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1. Non-Technical Summary

- 1.1 This is the non-technical summary of the sustainability appraisal for the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan: Draft Revised Policies document. It provides a brief summary of this Sustainability Appraisal and its findings.

About the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan

- 1.2 East Sussex County Council, the South Downs National Park Authority and Brighton & Hove City Council (the Authorities) work together to prepare Waste and Minerals Local Plans that guide where waste management facilities, quarries and other minerals related infrastructure should be built in East Sussex and Brighton & Hove, including the area of the National Park within East Sussex and Brighton & Hove. The Authorities jointly prepared the Waste and Minerals Plan (2013) and the Waste and Minerals Sites Plan (2017) currently guides development. The Authorities annually monitor the progress of the development against the Plan to see if these Plans need to be reviewed.
- 1.3 The Waste and Minerals Local Plan is, in combination with other relevant Local Plans such as those prepared by district and borough councils, used in the determination of applications for planning permission for waste and minerals development. It also contains some policies that apply to non-minerals and non-waste development. In this document where it refers to “the Plan” it means the Waste and Minerals Local Plan.

Why does the Plan need to be updated?

- 1.4 Currently, the sand and gravel that currently used in East Sussex and Brighton & Hove is either sand & gravel that is being recycled, being imported from elsewhere, or being quarried at Lydd Quarry which is located on the East Sussex / Kent border. Imported sand and gravel tends to be dredged from the sea bed and landed at the ports of Shoreham, Newhaven or Rye, or it is imported from quarries in neighbouring counties by lorry. It is used in virtually all construction projects, the quantity varying depending on the project.
- 1.5 The City, Boroughs, Districts and National Park within East Sussex and Brighton are either preparing or have prepared Local Plans which set out where development will occur in the coming years. One of the responsibilities of the Authorities is to ensure that sufficient sand and gravel is available for development, and this is achieved through the preparation of Minerals and Waste Local Plans.

- 1.6 In 2017, the Authorities identified in the East Sussex Local Aggregates Assessment that the Plan may not provide enough sand and gravel to meet the demand will be created by building homes, roads and other infrastructure in East Sussex and Brighton & Hove between now and 2033. The main reason for this is was that more sand and gravel has been quarried at Lydd quarry that had been planned. At the same time, the Authorities also identified, through using the policies when determining planning applications, that there were a small number of alterations could be made to the plans to make them work better and updated to reflect current policy, these were focused on specific policies such as WMP7a Sustainable Locations for Waste Development, WMP7b More Detailed Criteria for Waste Development and WMP27 Environment and Environmental Enhancement.

How did the Authorities develop the strategy?

- 1.7 Having identified that there was an issue, the Authorities held a public consultation asking for potential quarries to be submitted for consideration and any other evidence that may help the Authorities prepare an updated plan. In response to that consultation a number two extensions to existing quarries were submitted for consideration. One at Lydd Quarry (near Rye), for the extraction of sand and gravel, and one for an extension to the related to the Aldershaw Tiles Quarry (near Sedlescombe), which produces clay for use in specialist tile making. A number of other responses were al received that submitted evidence to be considered. The Authorities considered these submissions and also checked to see if there was any other updated legislation, case law, policy or guidance that should also be considered. A small number of options for consideration were developed and after careful consideration the chosen strategy was developed into a plan called the Draft Revised Policies document.

What is the Draft Revised Policies document?

- 1.8 This Draft Revised Policies document sets out the alterations that the Authorities are thinking of making to the Waste and Minerals Local Plan.

What does it propose?

- 1.9 The proposed strategy involves using recycled aggregate and imports from dredging and quarries outside East Sussex and Brighton and Hove to provide needed the sand and gravel, (Policy RM1). To help make sure this happens existing minerals facilities, such as the facilities that recycle sand and gravel and the ports and wharves where dredged sand and gravel can be landed, are being protected from development that may restrict how they can work (Policies RM3, RM5 & RM6). In the Plan Area, these

facilities exist in Shoreham, Newhaven, and Rye. There is also extra safeguarding for special type of sand call ‘soft sand’ of which there is only a small amount located between Plumpton and Ditching in the South Downs National Park (Policy RM3). The Authorities believe this will provide the required materials, whilst also protecting environmentally sensitive areas.

- 1.10 Beyond the sand and gravel strategy the Draft Revised Policies includes a proposal for an extension to the Aldersaw Tiles Quarry, a small quarry that provides clay for speciality building tiles. The proposed extension (Policy RM2) is around 0.2 hectares in area which is roughly the area eight tennis courts put side by side¹, and the clay from this extension would be extracted over the next 15 years.
- 1.11 Finally, the Draft Revised Policies document also includes four policies in relation to where waste facilities should be located and how the environment should be protected. These four updated policies are intended to have much the same effect as they do now, but their wording has been updated to reflect the latest best practice and the latest national planning policy. The following updates are proposed:

1.12

Existing Policy	Proposed Policy	Proposed Alterations
WMP2 - Minerals and Waste Development in the South Downs National Park,	RV1 - Minerals and Waste Development in the South Downs National Park and High Weald Area of Outstanding Natural Beauty	Add reference to the High Weald Area of Outstanding Natural Beauty into Policy. This is being proposed to clarify the requirements in relation to development within the AONB, which is currently addressed through WMP27.
WMP7a - Sustainable Locations for Waste Development and WMP7b - More Detailed Criteria for Waste Development	RW1 - Sustainable Locations for Waste Development	Consolidate both policies into one and clarify policy text.
WMP27 - Environment and Environmental Enhancement	RD1 - Environment and Environmental Enhancement	A requirement for net-gain in biodiversity has been added to the policy. A grey box that previously provided guidance in relation to how to assess applications in relation to the Habitats Regulation Assessment has been removed because the advice it was based on was declared unlawful in the High Court. ...

¹ A doubles tennis court is 23.77m long and 10.97m wide, which is about 260 square metres.

		Supporting text in relation to soils and their role in biodiversity and carbon capture have been included to reflect updated policy & guidance.
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What is a sustainability appraisal?

- 1.13 When preparing Local Plans the Authorities are required by law to undertake a sustainability assessment so that it may guide them as to how the plan is prepared and the potential impacts of the draft plan. The assessment takes a 'holistic' approach covering all aspects of effects on the environment, society and the economy. This sustainability appraisal also incorporates the assessments that are required by regulations called the Strategic Environmental Assessment Regulations.
- 1.14 To do this, the assessment starts by looking at available information to identify if there are topics that the plan may need to address and other plans and strategies that may affect the plan are also reviewed. With this information in mind, a set of objectives and criteria against the plan will be assessed are drawn up. These objectives are intended to be holistic and cover a range of topics. For this assessment the topics identified were: Health; Neighbouring Amenity; Equality & Access; Waste Minimisation; Sustainable Minerals Use; Water Quality; Water Resource; Flood Risk; Climate Change; Air Quality and Pollution; Transport; Soil; Historic & Built Environment; Biodiversity / Geodiversity; Renewable Energy; Economy; and Employment.
- 1.15 A 'scoping report' which contained the initial context, policy review and proposed assessment method is then published for public consultation. Any responses commenting on the scoping report are considered as the assessment is prepared.
- 1.16 As the updated plan document is prepared assessments of the sites being considered for allocation, major policy options, and the plan itself are undertaken. The assessments guide the Authorities as to what the likely effect a proposal will have in relation to each of the objectives. It does this by assessing if it will have a positive, negative, neutral or unknown effect. The "significance" of these effects is also assessed to be low, medium or high depending on how big the effect is likely to be in relation to that objective. When the potential effects are being considered, the potential to reverse the effect and the probability of it occurring are also considered. Where improvements could be made, recommendations are made, which in this assessment are referred to as "recommended mitigations".
- 1.17 It's important to remember these assessments are only intended to be broad brush assessments focusing on most significant effects. However, the assessment should on

the whole highlight the key effects so that the Authorities can make informed decisions can be made as to the effects of choosing a strategy.

How does the Sustainability Appraisal influence the development of the Plan?

- 1.18 The review of other plans and strategies undertaken for the appraisal has helped identify relevant plans and strategies that the Authorities had to be aware of when preparing the Plan. The sites submitted as part of the Call for Evidence and Sites were first assessed using the site assessment method published by the Authorities, they were also assessed using the framework set out within the Sustainability Appraisal which helped influence if the sites were later selected for allocation.
- 1.19 As the Authorities developed the strategy a number of options were considered, and each of these were assessed, which helped the Authorities choose a strategy. And, as the RPD was put together the revised policies in the RPD were also assessed, and where appropriate recommendations for alterations were made. This is an iterative process as the documents are prepared alongside each other, and this Sustainability Appraisal is assessment of the Plan right now. If further alterations to the RPD are proposed in the future, the Sustainability Appraisal will be updated.

What were the results of the Sustainability Appraisal?

- 1.20 As previously stated the Sustainability Appraisal includes a number of assessments. For this non-technical summary only key information is being highlighted. The complete assessments can be found within the report.
- 1.21 While the revised policies were being prepared the Authorities considered a number of options, the most important of these related to the overall strategy being proposed. Two options were presented in relation to the strategy for the provision of sand and gravel. The first option was to provide the required sand and gravel by maintaining the existing mix of recycling, imports and quarrying. This option would involve the allocation of the extension at Lydd Quarry. The alternative was to not allocate the extension at Lydd Quarry and rely on recycled and imported sand and gravel. The assessment indicated that both options were likely to support development by providing the required sand and gravel. In the case of the first option it was assessed if the extension was allocated this would have significant negative effects on a Site of Special Scientific Interest that had been identified for its geomorphology, but that this would make best use of the mineral in the area, because it is unlikely that it would be extracted if the quarry closed. On the other hand, if imports were to be relied upon this would likely result in a change in the traffic patterns as lorries are either transporting sand and gravel from further away or is being dredged and landed at

existing facilities in the ports and wharves in Shoreham, Newhaven and Rye. This would also mean that it was more unlikely that the mineral resource at Lydd may not be extracted, but it would protect the SSSI. The Authorities chose to base the strategy on the second option.

- 1.22 In relation to the provision of clay and the choice as whether to extend the Aldershaw Tiles Quarry, the options presented were either to extend or to not extend the quarry. The extension proposed is relatively small at 0.2 hectares and as the clay is to be used for the production of specialist tiles, it can only be sourced from the existing quarry or an extension to it. It was assessed that if allocated it would have the benefit of continuing the supply of clay to make speciality tiles and the associated economic benefits that are associated with it. However, this would result in the destruction of the ancient woodland which is located on the site. The Authorities chose to allocate the extension to the site.
- 1.23 Assessments were also carried out on options relating to the safeguarding minerals facilities and the prior extraction of minerals.
- 1.24 As the Draft Revised Policies document was prepared an assessment of each of the policies contained within the RPD was undertaken.
- 1.25 The assessment of the revised policies indicates that is likely to positively support the sustainable use of local mineral resources. This would be achieved the use of secondary and recycled minerals and continued use of existing mineral import facilities, prior extraction of safeguarded mineral resources and the safeguarding of minerals infrastructure to ensure the continuing provision of minerals. The revised policies also ensures the continuing provision of specialist clay. This is also likely to contribute to the growth of a sustainable economy by providing required resources for construction sector.
- 1.26 In relation to the effect of transporting waste and minerals on the environment the revised policies have been assessed to be likely to have a combination of mixed and positive effects. By providing minerals through the use of existing recycled aggregate and minerals import facilities such as wharves, ports, and railheads, the existing transport patterns will change as Lydd Quarry reaches the end of its permitted life. It is expected that this will be replaced by supply from the ports and railheads within the Plan Area (Shoreham, Newhaven, and Rye). The change in HGV patterns will have a positive effect in some locations, whilst negative in others depending on the travel patterns.

- 1.27 The revised policies are likely to have moderate mixed effects in relation to biodiversity / geodiversity. The allocation of clay extraction at Aldershaw Tiles will result in the destruction of area ancient woodland where the extraction is proposed. The RPD indicates that the extraction is very small scale and consequently the area affected will be limited. This was assessed to be likely to have a negative impact on impact on the biodiversity in that area. In a similar vein, to meet the Plan Areas demand for sharp sand and gravel will in part, be met by the importation of marine dredged aggregate. This was assessed to may have negative effects on marine biodiversity and marine habitats where it occurs. However, the assessment and mitigation of this effect will have been subject of assessment by the Marine Management Organisation in preparation of its Marine Plans and marine dredging licensing regime. To a lesser extent the revised policies may have minor effects on public health, climate change, air quality and pollution and employment.
- 1.28 Finally, the assessment of the three updated policies indicated that broadly the effect policies are likely to be like their previous versions. The sole exception to this was in the environment policy, which now also refers to ‘net-gain in biodiversity’. Net-gain in biodiversity means that when a site is developed that there should me more wildlife after the development by making areas better for wildlife. The Policy has included because of updated national planning policy, but the government is also considering placing stricter requirements in relation to net-gain. If that were to happen then the policy is likely to be more effective in providing net-gain, but this would become add to the cost of construction.
- 1.29 In addition to the assessment of the revised policies, an assessment of the locations likely to be affected was undertaken. This identified that East Sussex and Brighton & Hove will overall benefit as a result of the proposed revised policies owing to the provision of the minerals for development. Localised effects are likely to be found near the ports and wharves as more minerals are transported through them. However, it should be noted that these facilities are existing facilities that have permission to do this already. Lydd Quarry will run out of permitted reserves and is likely to cease its quarrying operation during the plan period, but Aldershaw Tiles will be able to continue as it is now. The safeguarding of the soft sand may also affect any proposed developments in the Plumpton / Ditching areas.
- 1.30 An assessment of how the Draft Revised Policies document will interact with other plans and strategies was also undertaken. Some interactions were identified almost all of which were positive, but these were all assessed to be of a low level of significance.

- 1.31 None of the assessment identified any potentially significant effects on internationally protected environmental sites.

What happens next?

- 1.32 This Sustainability Appraisal has been published alongside the Draft Revised Policies document for public consultation. Following the consultation all comments submitted on both the RPD and the SA will be considered. The RPD will then be revised, and then reassessed using the assessment in this Sustainability Appraisal. Both documents will then be published for a second public consultation later in 2020.

Can I comment on the Sustainability Appraisal?

- 1.33 Yes. Like the Draft Revised Policies Document, while it is out to consultation, so it it's Sustainability Appraisal. If you have any comments on the Appraisal, for example if the right plans and strategies have been identified as being relevant or if there are areas of the assessment that could be improved, you can submit them using the information on <http://consult.eastsussex.gov.uk>.

2. Introduction and Background

- 2.1 This is the Sustainability Appraisal (SA), incorporating the requirements of the EU Strategic Environmental Assessment Directive² and the Environmental Assessments of Plans and Programmes Regulations 2004, for the East Sussex, South Downs and Brighton & Hove Waste and Minerals Revised Policies Document (RPD). The RPD is a draft local plan document that sets out for consultation the Authorities proposals to amend the WMP and WMSP by changing the land use strategy in relation to aggregate provision and making a number of other alterations to those plans.
- 2.2 This SA is based on and updates previous sustainability assessments undertaken during the preparation of the Waste and Minerals Plan (WMP) and Waste and Minerals Sites Plan (WMSP). Using the updated framework it contains an assessment of the RPD and makes recommendations which the Authorities preparing the RPD can consider during its preparation.
- 2.3 For the purposes of this SA, “the Plan” refers to the WMP, WMSP and RPD in combination, also known as the Waste and Minerals Local Plan (WMLP), whilst the RPD or revised policies refers to the proposed amendments. In an effort to keep this SA focused, the assessments undertaken primarily proposed alterations; but it is important to remember that these amendments fit within the wider WMLP.

Requirement for sustainability appraisal / strategic environmental assessment

- 2.4 The Planning and Compulsory Purchase Act 2004 requires that an SA is carried out for all local plans. As the review is of a plan that sets a framework for future development consent of projects that has the potential to have likely significant environmental effects, a Strategic Environmental Assessment (SEA), is also required by the European Directive EC/2001/42 (the SEA Directive), and The Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) is also necessary. The NPPF also states that an SA, incorporating the requirements of the SEA Directive and Regulations, is integral to the plan making process.
- 2.5 The SA process plays an important role in demonstrating that a local plan is contributing to achieving sustainable development through the integration of environmental, social and economic considerations into the local plan. It is a

² European Directive EC/2001/42

systematic and iterative process which assesses the likely significant effects of the plan on the environment, the economy and society.

- 2.6 SEA introduces a systematic assessment of the environmental effects of plans and programmes, including land use plans. Its objective is *'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes, with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out on certain plans which are likely to have significant effects on the environment.'*
- 2.7 Although the requirements of SA and SEA are distinct, this is a single joint appraisal incorporating SA and SEA requirements to ensure that all issues are considered. Hereafter, wherever SA is mentioned it can be assumed that this also means the SEA process.

The East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan

- 2.8 East Sussex County Council, the South Downs National Park Authority (SDNPA) and Brighton & Hove City Council are the three waste and minerals planning authorities (collectively referred to as the Authorities) for the Plan Area. The Authorities are responsible for preparing the Waste and Minerals Local Plan (WMLP) which is used in the determination of planning applications for minerals and waste development.
- 2.9 The WMLP currently consists of two Local Plan documents and one Supplementary Planning Guidance Document:
- Waste and Minerals Plan (adopted 2013) (WMP)
 - Waste and Minerals Sites Plan (adopted 2017) (WMSP)
 - Construction and Demolition Supplementary Planning Document 2006
- 2.10 The existing WMLP sets the Authorities' planning policies governing waste management and minerals development in the Plan Area up to the year 2026. It includes strategic policies, development management policies and site specific allocations.
- 2.11 The Plan Area consists of the County of East Sussex, the City of Brighton & Hove and the area of the South Downs National Park within the County and the City.
- 2.12 As documented above, Sustainability Appraisals were undertaken during the preparation of the WMP and WMSP. Since the adoption of these documents, regular

monitoring has been undertaken and reported in the Authorities Monitoring Reports and Local Aggregates Assessments.

- 2.13 In the Local Aggregates Assessment 2016 it was identified that the planned provision of aggregate may be insufficient and that additional aggregate supplies may be required before 2026. In light of this the Authorities have committed to undertake **a review of the WMLP focusing on the provision of aggregates and mineral resources and infrastructure safeguarding. The review will also seek to improve the effectiveness of certain policies within the Plan.** The review of policy effectiveness is not intended change the direction of policy, but is intended to provide further clarity where ambiguity has been found in the Plan. Other topics raised through consultation will be considered, but may or may not be included within the review.

Contents of the Draft Revised Policies Local Plan

- 2.14 In 2017 the Authorities conducted an initial Call for Evidence and Sites which sought evidence on the proposed scope and for sites to be submitted for consideration. The initial scope identified three topics:
- Topic A: Aggregate Provision;
 - Topic B: Safeguarding Minerals and Minerals Infrastructure; and
 - Topic C: Improving Policy Effectiveness.
- 2.15 Topic A and Topic B respectively seek to ensure ongoing minerals provision to the plan area during the plan period (2020-2034) and to safeguard minerals for future use and the infrastructure that provides them. Topic C: Improving policy effectiveness, in contrast to other topics, seeks only to improve the effectiveness of existing policy, changes in policy direction are not proposed under this topic. A fourth topic “Topic D: Provision of Clay” was introduced following the Call for Evidence and Sites. This seeks to address the future provision of specific specialist brick clay.
- 2.16 In broad terms, the Draft East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan: Revised Policies Document seeks to:
- ensure ongoing minerals provision to the Plan Area through the recycling of aggregate and importation of aggregate by sea, rail and road (Policy RM1);
 - consolidate and strengthen the safeguarding of minerals resources (Policy RM3), wharves and railheads (Policy RM5), and concrete batching plants etc. (Policy RM6); and

- make the exiting requirements for prior extraction more explicit (Policy RM4).
- 2.17 The RPD, if adopted as proposed, would replace the existing strategy that seeks to support the provision and use of recycled aggregates while also providing 0.1mt of land-won aggregate per annum from within the Plan Area. The strategy in relation to the provision of soft sand remains unchanged from the WMP. However, in a change from the WMP the identified soft sand within the Plan Area is being safeguarded and identified on the Policies Map.
- 2.18 Three revised policies are proposed under the Topic C: Improving Policy Effectiveness - Policy RW1 Sustainable Locations for Waste Development is proposed to replace WMP7a and WMP7b clarifying the relationship between those two policies. Policy RD1 Environment and Environmental Enhancement is proposed to replace WMP27 to take into account case law and updated national policy and guidance since the publication of the policy. Policy RV1 is proposed to replace Policy WMP2 Minerals and Waste Development affecting the South Downs National Park. RV1 should provide greater clarity in relation to development within the High Weald ANOB (previously addressed through Policy WMP7a and WMP27), and bring it into closer alignment with the NPPF.
- 2.19 The Authorities intend that the alterations will improve the effectiveness of these policies whilst retain the existing policy direction.
- 2.20 The proposed policies will replace the following:
- WMP - Minerals and Waste Development affecting the South Downs National Park (WMP2)
 - WMP - Sustainable Locations for Waste Development (WMP7a, 7b)
 - WMP - Provision of Aggregates (WMP11)
 - WMP - Safeguarding Minerals Resources (WMP14)
 - WMP - Safeguarding Railheads and Wharves (WMP15)
 - WMP - Environment and Environmental Enhancement (WMP27)
 - WMSP -Minerals Safeguarding Areas for land won minerals resources within the Plan Area (SP8)
 - WMSP - Safeguarding wharves and railheads within the Plan Area, Sand (SP9)

- WMSP - Safeguarding Wharves, Railheads and Concrete Batching: Concrete Batching Plants (paragraphs 4.20-4.21) and Policy SP10 Safeguarding facilities for concrete batching, coated minerals manufacture and other concrete products within the Plan Area (SP10)
 - WMSP - Minerals Consultation Areas (SP11)
- 2.21 A number of changes to supporting text are also proposed to update the existing Plan, explain the reasoning behind the new policy and provide guidance on how it should be interpreted.
- 2.22 No alterations are proposed to other policies of the Waste and Minerals Local Plan and these would remain unchanged.

3. Sustainability Appraisal Process and Plan Making

Sustainability Appraisal Process

- 3.1 The SA process is underpinned by the requirements of the SEA Directive and SEA Regulations and the approach adopted for this report follows the guidance set out in the Government's Planning Practice Guidance.

Table 1 Key stages

SA Stage	Task	
Stage A	<p>Setting the context and objectives, establishing the baseline and decide on the scope.</p> <ol style="list-style-type: none"> 1. Identify other relevant policies, plans and programmes, and sustainability objectives. 2. Collect baseline information. 3. Identify sustainability issues and problems. 4. Develop the sustainability appraisal framework. 5. Consult the consultation bodies on the scope of the sustainability appraisal report. 	A consultation on the Sustainability Appraisal Scoping Report (March 2018) was held between 6 March and 17 April 2018.
Stage B	<p>Developing and refining alternatives and assessing effects</p> <ol style="list-style-type: none"> 1. Test the Local Plan objectives against the sustainability appraisal framework. 2. Develop the Local Plan options including reasonable alternatives. 3. Evaluate the likely effects of the Local Plan and 	This is documented in this report and its technical annex.

	<p>Alternatives.</p> <ol style="list-style-type: none"> 4. Consider ways of mitigating adverse effects and maximising beneficial effects. 5. Propose measure to monitor the significant effects of implementing the Local Plan. 	
Stage C	Prepare the sustainability appraisal report	This document is the sustainability appraisal for the draft Revised Policies.
Stage D	Seek representations on the sustainability appraisal report from consultation bodies and the public.	Comments may be made on this document as part of the Regulation 18 consultation on the draft Revised Policies.
Stage E	Post adoption reporting and monitoring	This stage has not yet occurred.

Compliance with SEA Directive & Regulations

- 3.2 This SA incorporates the requirements of the Strategic Environmental Assessment Directive (2001/42/EC). The Environmental Assessment of Plans and Programmes Regulations 2004 incorporate the requirements of the Directive into UK law. The table below provides signposts as to how this SA meets each of the SEA requirements set out in the 2004 regulations:

SA / SEA Regulations checklist

Preparation of environmental report (regulation 12)

Preparation of an environmental report that identifies describes and evaluates the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme (regulation 12(2)).

The report shall identify, describe and evaluate the likely significant effects on the environment of (a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.

The report shall include such of the information referred to in Schedule 2 as may reasonably be required, taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in the process to avoid duplication of the assessment (regulation 12(3)). Information may be provided by reference to relevant information obtained at other levels of decision-making or through other EU legislation (regulation 12 (4)).

When deciding on the scope and level of detail of information to be included in the environmental report the consultation bodies should be consulted.

East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan: Revised Policies Document
Sustainability Appraisal (March 2020) - 3. Sustainability Appraisal Process and Plan Making

The information referred to in Schedule 2 is:	Component of SA Report / Comment
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	2. Introduction and Background
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	4. Sustainability Context and Issues - Sustainability Issues and Problems
c) The environment characteristics of areas likely to be significantly affected.	4. Sustainability Context and Issues - Key Characteristics of the Plan Area 4. Sustainability Context and Issues - Characteristics of areas likely to be significantly affected Technical Annex B: Sustainability Indicators Technical Annex C: Maps
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 2009/147/EC (Conservation of Wild Birds) and 92/43/EEC (Habitats Directive).	4. Sustainability Context and Issues - Table 2 Issues and Problems at Sites of International Nature Conservation Importance. Technical Annex C: Maps
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Technical Annex A: Review of Policies, Plans and Programmes Summarised into 5. Sustainability Appraisal Framework
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	6. Appraisal of Options 7. Appraisal of Sites 8. Appraisal of Plan and Policies Annex D: Appraisal of Sites Annex G: Policy Appraisal Annex I: Combined Policy Appraisal

g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	7. Appraisal of Sites 8. Appraisal of Plan and Policies Annex D: Appraisal of Sites Annex G: Policy Appraisal Annex I: Combined Policy Appraisal
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical efficiencies or lack of know-how) encountered in compiling the required information.	5. Sustainability Appraisal Framework - Difficulties Encountered 6. Appraisal of Options Technical Annex E: Options Appraisal
i) A description of measures envisaged concerning monitoring in accordance with regulation 17.	9. Monitoring
j) A non-technical summary of the information provided under the above headings.	1. Non-Technical Summary.
Consultation procedures (regulation 13) As soon as reasonably practicable after their preparation, the draft plan or programme and environmental report shall be sent to the consultation bodies and brought to the attention of the public, who should be invited to express their opinion. The period within which opinions must be sent must be of such length as will ensure an effective opportunity to express their opinion.	A public consultation on the Waste and Minerals Local Plan Review: Scoping Report was held 6 March 2018 - 17 April 2018.
Information as to adoption of plan or programme (regulation 16) As soon as reasonably practicable after the plan or programme is adopted, the consultation bodies, the public and the Secretary of State (who will inform any other EU Member States consulted) shall be informed and the following made available: the plan or programme adopted; the environmental report; a statement summarising: (a) how environmental considerations have been integrated into the plan or programme; (b) how the environmental report has been taken into account; (c) how opinions expressed in response to: (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account; (d) how the results of any consultations entered into under regulation 14(4) have been taken into account; (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme. (regulation 16)	This is not addressed within this document at this time. An adoption statement will be produced should the Plan be adopted.

Monitoring of implementation of plans or programmes (regulation 17)

Monitoring of significant environmental effects of the plan's or programme's implementation with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action (regulation 17 (1)). Monitoring arrangements may comprise or include arrangements established for other purposes (regulation 17 (2)).

Monitoring has been incorporated into this sustainability appraisal, in the form up the update of the policy review and monitoring indicators. These in turn have fed into the revised issues and objectives. Monitoring will continue after the Plans adoption as required by regulation.

Current Sustainability Appraisal of adopted Waste and Minerals Local Plan

- 3.3 The Sustainability Appraisal of the Revised Policies Document (RPD) updates the Sustainability Appraisals undertaken in the preparation of the Waste and Minerals Plan (WMP) the Waste and Minerals Sites Plan (WMSP) by undertaking appraisals of any new or revised policies. The complete list of previous relevant documentation is listed in Annex M of the Technical Annex.

4. Sustainability Context and Issues

Review

- 4.1 The first part of Stage A of the SA process involved establishing the evidence base for the appraisal. It has involved a review of plans, policies, and programmes and the collection of baseline information.
- 4.2 A review was undertaken of plans, policies and programmes that are relevant to sustainable development in the Plan Area and to the management of waste and minerals. This sets the policy context for the Plan. The review identified the key sustainable development policy objectives and relevant targets which have fed into the identification of sustainability issues. An updated list is set out in Annex A and these have informed the objectives for the SE/SEA process.
- 4.3 In summary the objectives are as follows:

Social

1. To avoid negative effects and enhance, where possible, positive effects on health.
2. To protect the amenity of residents and neighbouring land uses.
3. To improve equality and access to sustainable waste management.
4. To minimise waste generation and disposal to land.

Environmental

5. To ensure the sustainable use of local mineral re-sources.
6. To maintain and improve water quality.
7. To seek the protection of and sustainable use of water resources.
8. To reduce risk and impact of flooding.
9. To limit the causes of and adapt to climate change.
10. To protect air quality and reduce air pollution.
11. To reduce adverse impacts of transporting waste and minerals on the environment.
12. To conserve and enhance important soil functions and types.
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.
14. To protect, conserve and where appropriate enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.
15. To increase energy efficiency and the proportion of energy generated from renewable sources.

Economic

16. To contribute to the growth of a sustainable and diversified economy.
17. To provide employment opportunities and develop and maintain a skilled work-force.

- 4.4 The collection of baseline information will help to provide a basis for predicting and monitoring effects of the Review, and has also helped in identifying sustainability issues and problems. The full baseline data table and maps are set out in Annex B and Annex C of this report.

Key Characteristics of the Plan Area

- 4.5 The Plan Area comprises the county of East Sussex and the city of Brighton & Hove. The county of East Sussex contains the boroughs of Eastbourne and Hastings and the districts of Lewes, Rother and Wealden. Parts of the Plan Area fall within the boundary of the South Downs National Park. The Plan Area is characterised by a densely populated urban coastal zone and a dispersed settlement pattern in rural areas. The estimated population of the Plan Area in 2016 totals 837,026, of which 547,797 live in East Sussex and 289,229 live in Brighton & Hove. Three quarters of the total population live in the coastal area with the highest concentration to the west, in Brighton & Hove. The need for additional waste management and minerals supply is underlined by population increases across the Plan Area, with the population of Brighton & Hove

having increased by 7.4% since 2008, and the population of East Sussex having increased by 5% over the same time period.

- 4.6 Health deprivation has improved since it was last monitored; however, it is a significant problem in parts of the Plan Area, most notably in specific areas of Hastings and Brighton & Hove. In Hastings, life expectancy for both men and women is below the national average and the lowest in the Plan Area, while men in Brighton & Hove also demonstrate a life expectancy below the national average. 18% of Super Output Areas (SOA) in Hastings and 14% in Brighton & Hove fall within the 20% most health deprived SOA nationally.
- 4.7 Employment and income deprivation are significant problems in Hastings, and in other parts of the Plan Area. Low skill levels and poor education attainment are issues in some areas. Eastbourne and Hastings have a greater proportion of people with no qualifications than the national average.
- 4.8 Much of the Plan Area is recognised for its high quality landscape which forms an important part of the area's distinctive character. The South Downs National Park and High Weald Area of Outstanding Natural Beauty (AONB) cover around two thirds of the Plan Area. The Low Weald is a landscape of considerable historic complexity. The South Downs National Park was confirmed by statute in April 2010, with the National Park Authority becoming fully operational in April 2011.
- 4.9 The Plan Area possesses an array of sites designated as being of international, national, regional and local importance for biodiversity. There are five Special Areas of Conservation (SAC), two Special Protection Areas (SPA) and two Ramsar sites, which are strictly protected by the EU Habitats and Birds Directives. A proposed marine extension to the SPA and Ramsar designation at Dungeness/Rye Harbour is currently being considered by Natural England. Table 1 presents the issues and problems that are occurring at these designated sites.

Table 2 - Issues and Problems at Sites of International Nature Conservation Importance

Site	Reason for designation	Issues and problems
Ashdown Forest SAC	Wet and dry heathland and population of great crested newt	Insufficient grazing; Spread of scrub and bracken; Long-term drying out of site; Possible impact of extraction. Impact of NO2 deposition linked with traffic and agricultural

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		practices, among other causes.
Ashdown Forest SPA	Populations of Dartford warbler and nightjar	Lack of management; Succession from open heathland to woodland; Lack of grazing; Spread of invasive species; Impact from recreational use on ground nesting birds.
Lewes Downs SAC	Calcareous grassland	Scrub encroachment; Leaching and spray drift from surrounding farmland.
Castle Hill SAC	Calcareous grassland	Scrub encroachment; Leaching and spray drift from surrounding farmland.
Hastings Cliffs SAC	Vegetated sea cliffs	Erosion by surrounding coastal protection measures and offshore activities; Visitor pressure; Adjacent farming practices.
Dungeness SAC	Driftline vegetation, vegetated shingle and population of great crested newt	Disturbance by vehicles and Walkers; Illicit gravel extraction; Invasion of willows; Water abstraction; Air pollution.
Dungeness to Pett Level SPA	Breeding common tern, little tern and Mediterranean gull and for passage/wintering populations of aquatic warbler, Bewick's swan and shoveler	Coastal erosion; Predation of bird populations; Aircraft disturbance; Recreational and leisure activities; Changing agricultural practices; Heavy grazing; Lowering water levels.
Dungeness to Pett Level Ramsar site	Driftline vegetation; Natural shingle wetlands; Bryophytes; Vascular plants; Invertebrates; populations of waterbirds.	As per entries above for SPA and SAC designation.
Pevensey Levels Ramsar and SAC Site.	Populations of aquatic plants and invertebrates	Introduction/invasion of non-native plant species; Pollution from domestic sewage.

4.10 National designations include over 15,500 ha of Sites of Special Scientific Interest (SSSI) that are important for wildlife or geological interest, four National Nature Reserves and 11.6% of East Sussex is covered by Ancient Woodland, the highest proportion of any county in England. There are also designations of local importance including 1,995 ha of Local Nature Reserves and 353 Sites of Nature Conservation Importance.

- 4.11 East Sussex and Brighton & Hove possess highly valued built and cultural environments, which include 321 scheduled ancient monuments, 151 conservation areas, many listed buildings and some registered parks and gardens, battlefields and wrecks. There are over 33,000 entries on the Historic Environment Record which records and maps the known archaeology of East Sussex and Brighton & Hove and identifies areas where development may affect historical/archaeological remains. Apart from the known components of the historic environment there is much that is not identified but may be discovered through developing a site.
- 4.12 The strategic road network serving the Plan Area comprises the A/M23, M25, A21 and A27/A259. Primary routes which link into the strategic road network and serve the Plan Area are the A22, A26, and the A272. In general the quality of the highway and trunk road network in East Sussex and Brighton & Hove is not fit for purpose for carrying long distance strategic traffic and this leads to vehicles using inappropriate rural roads, with key trunk roads at or near to capacity.
- 4.13 The rail network links the main coastal towns and their rural hinterland with London, Southampton and the continent, via Ashford International Station in Kent. The freight carrying potential of the network is not fully utilised and some spare capacity exists on routes such as those south of Gatwick Airport.
- 4.14 There are ports at Newhaven, Shoreham and Rye, which import marine dredged aggregates and crushed rock. Newhaven is the only port in East Sussex that is still accessible by rail for the movement of freight, including waste and minerals. Aggregates are imported into Shoreham and Newhaven, and crushed rock and secondary materials are imported into Rye and Newhaven, all of which are subsequently transported by road.

Minerals

- 4.15 Minerals are naturally occurring substances including metals, rocks and hydrocarbons that are extracted from the earth by mining, quarrying and pumping. They are used in a wide range of applications related to construction, manufacturing, agriculture and energy supply. The following minerals are found in the Plan Area:
- **Aggregates:** sand and gravel are important for infrastructure and buildings. There has been a low-level of extraction of land-won sand and gravel in East Sussex, and therefore imports of marine aggregates and crushed rock have been required for meeting local needs. There are currently two permitted sites

for land-won aggregates although only one is being worked. The inactive (soft sand) site is located in the South Downs National Park.

- **Chalk:** there are no active chalk quarries in East Sussex and chalk required for agriculture has been supplied by imports.
- **Clay:** is extracted in East Sussex for brick and tile manufacture. There are four active sites in East Sussex for clay extraction and an extant planning permission for a new brickworks and clay pit.
- **Gypsum:** is used for plaster and plasterboard, cement and other industrial process. There is one site in East Sussex, at Robertsbridge, which is the largest deposit of gypsum in the UK. Desulphogypsum (DSG) is a by-product and can be used as an alternative to gypsum.
- **Oil and gas:** exploration took place in the 1980s. This found no commercially viable resources.
- **Recycled and secondary aggregates:** there are 16 sites in the Plan Area which recycle CDEW to produce around 327,000 tonnes of recycled/secondary aggregates.
- **Wharves and railheads:** marine aggregates and crushed rock are imported through the ports of Newhaven, Rye and Shoreham. The railhead at Newhaven imports landwon and recycled aggregate as well as crushed rock. DSG is transported to the gypsum processing facility at Robertsbridge.

Waste

- 4.16 Waste is defined³ as materials or goods we discard because they are no longer needed. The Waste Strategy for England (2007) emphasises the importance of moving the treatment of waste away from landfill and up the waste hierarchy. This message has been reiterated by Government; through the Government Review of Waste Policy in England 2011 and the consultation draft Updated National Waste Planning Policy: Planning for Sustainable Waste Management. Whatever the origin of the waste material, it is important that it is viewed as a valuable resource which can be reused, recycled or used to recover energy rather than being discarded or disposed of without any value being extracted. In general terms, waste is categorised as the following:

³ See Directive 2008/98/EC on waste (Waste Framework Directive). Available at: <http://ec.europa.eu/environment/waste/framework/>

- Non-inert (non-hazardous) waste: this is potentially biodegradable or may undergo significant physical, chemical or biological change if deposited at a landfill site. It is made up of household, industrial and commercial waste.
- Inert waste: this does not normally undergo any significant physical, chemical or biological change when deposited at a landfill site. It may include materials such as rock, concrete, brick, sand, some sub-soils or certain arisings from road construction or maintenance.
- Hazardous waste: this may pose a greater risk of harm to human health and the environment due to the properties of the waste (e.g. explosive or corrosive). It might include clinical waste.

Waste in East Sussex and Brighton & Hove

4.17 Around 1.75 million tonnes of solid waste is handled in the Plan Area each year. The main types are:

- Local Authority Collected Waste (LACW): this is waste collected by local authorities, generally from households, street cleaning and public parks and gardens. The current production of around 360,000 tonnes per annum makes up about 21% of all wastes in the Plan Area.
- Commercial and Industrial (C&I) Waste: this is from shops, food outlets, businesses and manufacturing activities. It is estimated that around 475,000 tonnes of C&I waste was produced in 2008/09 and makes up about 27% of wastes in the Plan Area.
- Construction, Demolition and Excavation Waste (CDEW): this is produced from building activity. The amount fluctuates considerably due to economic and social factors, with increases during periods of high development activity. Accurate figures for arisings are difficult to obtain and estimates suggest that around 906,000 tonnes was produced in 2008/09 making up about 51% of total waste arisings in the Plan Area.
- Other wastes: include hazardous waste (around 19,000 tonnes per year), low level radioactive waste, liquid waste (other than wastewater), and wastes arising from the agricultural sector. Hazardous wastes in total make up around 1% of the total waste stream in the Plan Area.
- Wastewater: this is water and solids collected from public sewers which flow to water treatment works. There are 74 wastewater treatment works within

the Plan Area, treating on average, approximately 90 million cubic metres of wastewater each year.

- 4.18 There is a range of existing waste management facilities within the Plan Area for different types of waste streams including recycling and composting, bulk metals recycling, CDEW recycling, other recovery, hazardous treatment, non-hazardous landfill and inert landfill.

Table 3 Last Known Methods of Management of Waste in the Plan Area

	Year of Data	Recycling	Other Recovery	Landfill
LACW	2015/16	39.6 %	55.7 %	4.7 %
C&I	2008/09	67 %	4 %	29 %
CDEW	2008/09	45 %	40 %	15 %

Sustainability Issues and Problems

- 4.19 Sustainability issues and problems have been identified with reference to the updated baseline information, the policy review, technical studies and assessments undertaken to support the WMLP, and in-house knowledge. They focus on the key issues for sustainable development in the Plan Area that are relevant to the management of waste and minerals set out below. It also draws out the likely outcome if a review is not undertaken.

Social Objectives

1. To avoid negative effects and enhance, where possible, positive effects on health

Health Inequalities

- 4.20 Health inequalities exist within the Plan Area, and health deprivation is a significant problem in some parts. Life expectancy varies throughout the area. The lowest for both men and women is in Hastings. Male life expectancy is below the national average in Brighton & Hove and Hastings, and female are below the national average only in Hastings. All areas have shown a slight improvement over the last five years.
- 4.21 A disproportionately high percentage of SOA in the Plan Area are ranked within the most deprived 20% in the country with comparatively high health deprivation when compared nationally. Hastings remains the most health-deprived authority in the Plan

Area. Health deprivation remains a problem in parts of Brighton & Hove, but it has improved in recent years. Lewes, Rother, Eastbourne and Wealden have a better health deprivation ranking than the East Sussex average.

Likely future without the Review

- 4.22 Health and health inequalities are likely to improve without the Review of the WMLP, due to other initiatives to promote good health and address inequalities such as measures set out within the various local authority Local Plans and Community Strategies and national policy initiatives introduced through the Health and Social Care Act 2012 and the activities of Public Health England.

How can the Plan & Review affect this?

- 4.23 There are many factors that affect this statistic which lie beyond the WMLP's remit, however, it should seek to minimise any risks to health that could arise from waste and mineral development and related activities. This can be achieved through consideration of issues in areas of transport, amenity, water resources, and flood prevention and pollution control. Socio-economic impacts are also to be considered, where pockets of poor health are strongly associated with areas of relative economic deprivation.

Pollution incidents

- 4.24 The number of pollution incidents in the Plan Area appears to have decreased between 2009 and 2016. The reasons for this decrease are unknown, but may be in part due to policy within the WMLP.

Likely future without the Review

- 4.25 It is likely that the existing trend towards less damage to the environment than in the past will continue and provide an improvement in public health as a result. This will come from implementation of development management policies in the WMLP and permitting and inspection of sites by the Environment Agency and Environmental Health departments.

How can the Plan & Review affect this?

- 4.26 Though regulatory bodies such as the Environment Agency and Environmental Health departments are responsible for ensuring that sites operate without a risk to health, the WMLP should support this aim wherever it has influence.

2. To protect the amenity of residents and Neighbouring land uses

High quality community environment

- 4.27 Communities within the Plan Area generally experience a high quality environment as indicated by residential surveys and data on public open spaces. However, East Sussex and Brighton & Hove is a well-populated county and city with a strongly humanized landscape and it is difficult to get very far from buildings, roads and vehicles and there is no real wilderness landscape, hence the County as a whole cannot be noted for its remoteness. For this reason where remote landscapes and open, green space exist in East Sussex and Brighton & Hove they are highly valued for the sense of 'getting away from it all', tranquillity, recreation and sense of wellbeing they can provide.

Likely future without the Review

- 4.28 It is possible that the high quality environment within the Plan Area could become eroded without implementation of the Review, due to the lack of control that the Authorities would have on the location of development. It is possible that proposals could come forward for development in areas with a rural character. Through policy in the WMP adverse impacts on residents and neighbours should continue to be protected without implementation of the Review.

How can the Plan & Review affect this?

- 4.29 The WMLP should ensure that new minerals and waste development and their related activities do not have an unacceptable impact upon areas of remoteness and public open space. It can address this by:
- ensuring good design of facilities;
 - avoiding developing on open space that is valuable to communities;
 - minimising noise, odour and dust from waste and minerals developments;
 - locating facilities away from sensitive receptors; and / or
 - restoring mineral workings and waste sites for community use.

3. To improve equality and access to sustainable waste management

Unequal access to waste services

- 4.30 Kerbside recycling collection is no longer monitored, but is believed to be now universal across the Plan Area; there is, however, variation in the collection services. There are twelve household waste recycling sites in the Plan Area.

Likely future without the Review

- 4.31 Adequate provision of waste management facilities which facilitate access to waste services is anticipated to improve based on the provision made within the WMLP. However, the provision of waste collection is beyond the scope of the WMLP and may have a more direct effect if it is altered.

How can the Plan & Review affect this?

- 4.32 The WMLP has little direct scope to improve kerbside collection of recyclable materials. However, it can:
- support waste collection authorities by providing appropriate facilities to enable more materials to be collected and processed; and
 - support more recycling and composting by ensuring household waste recycling centres are safeguarded and well located.

4. To minimise waste generation and disposal to land

Waste generation

- 4.33 The amount of Local Authority Collected Waste (LACW) generated in East Sussex and Brighton & Hove over the last 10 year period has been decreasing slightly each year, but in the past two years has started to increase. This broadly reflects similar trends in the South East region and nationally. Estimates for the amount of C&I waste generated in 2006/07 and 2007/08 show fluctuating levels. However, this is only an estimate as it is difficult to gain accurate information for this waste stream. CDEW makes up approximately 51% of waste in the Plan Area. Hazardous waste arisings in the Plan Area appear to increase in 2007, followed by a decline in 2009, reflecting the position regionally. Hazardous waste makes up approximately 1% of waste in the Plan Area, but again, reliable data is not readily available.

Likely future without the Review

- 4.34 It is unlikely that the Review will affect the amount of waste generated. Existing waste trends are likely to continue: LACW waste arisings being linked to population and household size; commercial and industrial waste being linked to economic activity; and construction, demolition and excavation waste being linked to construction activities.

How can the Plan & Review affect this?

- 4.35 The WMLP should provide suitable opportunity to deliver the built development that is necessary to treat the waste that is generated.

Recycling and recovery

- 4.36 The percentage of LACW being recycled or composted in East Sussex and Brighton & Hove is steadily increasing. The percentage of waste being used to recover energy has been increasing year by year. The percentage of the total tonnage of LACW arisings in East Sussex and Brighton & Hove experienced a jump in 2011/12 with the coming on-stream of the Newhaven ERF which means more waste is used to recover energy than in the South East overall and England.

Likely future without the Review

- 4.37 The level of recycling and recovery should continue to increase within the existing policy context of the WMLP.

How can the Plan & Review affect this?

- 4.38 The review may provide an opportunity to further improve the recycling of construction, demolition and excavation waste whilst seeking to produce recycled aggregates. The WMLP should support, encourage and enable more recycling and composting by providing sufficient opportunity for facilities to meet increased demands and enable targets to be reached.
- 4.39 The WMLP should provide sufficient opportunity for facilities to enable the full potential of recovery of energy (heat and power) and diversion of waste from landfill; however this should not be at the expense of managing waste higher up the waste hierarchy.

Landfill

- 4.40 The amount of LACW going to landfill in East Sussex and Brighton & Hove has continued to fall since 2003/04 declining to a low of 3.2% in 2014/15. It has been estimated that 29% of C&I waste was landfilled in 2008/09. Data for more recent years are not available. The current estimate shows a decline in CDEW going to landfill from a previous estimate of approximately 60% of total CDEW waste to 15% in 2008/09. There is no longer any available landfill capacity within the Plan Area.

Likely future without the Review

- 4.41 The amount of waste landfilled should continue to fall in line with existing WMLP policies. The Review is unlikely to affect this.

How can the Plan & Review affect this?

- 4.42 The WMLP should help maintain and improve the positive trend by encouraging more sustainable methods of waste management and ensure that there is sufficient opportunity for facilities to enable more waste to be diverted from landfill.
- 4.43 Though current estimate shows a decline, CDEW still represents just under half of waste sent to landfill. The WMLP should ensure that there is sufficient opportunity for facilities to enable more waste to be diverted, while taking account of the need to use inert waste to restore mineral sites.

Environmental Objectives

5. To ensure the most sustainable use of mineral resources

Supply of Construction Minerals

- 4.44 National policy requires that Local Plans should 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
- 4.45 With regards to aggregates Minerals planning authorities (Mpa) should plan for a steady and adequate supply of aggregates by preparing an annual Local Aggregate Assessment (LAA) 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). The Mpa should make provision for the land-won and other elements of their LAA in their mineral plans. They should use landbanks of aggregate minerals reserves as an indicator of the security of supply, and set out the additional provision needed for new extraction and alternative supplies in mineral plans.
- 4.46 The overall picture of aggregate supply to the 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. Crushed rock, recycled aggregate and sand and gravel are imported by rail at Newhaven. Land-won sand and gravel is extracted in the east of the Plan area at Lydd with about 50% of material being consumed in East Sussex. A steady supply of recycled material is produced from construction waste management facilities across the Plan area. A continuing demand for construction materials is anticipated. It has been

identified that the provision of aggregates currently made in the WMLP for the Plan period will be insufficient.

- 4.47 The draft South East Aggregates Monitoring Report 2016 finds that regionally there has been a relative decline in land won sand and gravel extraction in comparison with other sources, and in particular marine aggregates and rock imports.
- 4.48 The report also concludes that for the Plan Area there is an overall land bank of sand and gravel in excess of 7 years that will quickly be eroded without new permissions. Moreover, if the sand and gravel quarries sales increase the land bank would diminish even faster.

Likely future without the Review

- 4.49 It is uncertain how future trends in marine dredged aggregates and marine imports of crushed rock will evolve without implementation of the Review. It is possible that this will increase if economic recovery continues, but this is dependent on levels of construction and demand for materials. The amount of secondary recycled aggregates is likely to increase through policy in WMP to promote their production, but it is likely to be lower without implementation of the Review than it would otherwise be because new facilities to recycle aggregates will be fewer, as without allocated sites the necessary facilities are less likely to be developed.

How can the Plan & Review affect this?

- 4.50 The WMLP will need to consider the different supply options for aggregates and how these may contribute to meeting demand for construction materials.
- 4.51 Marine dredged aggregates and imports of crushed rock form an important element in the supply of aggregates locally and regionally. Opportunities should be fully considered and exploited in the WMLP to meet the required need. This will include the safeguarding and use of wharves and rail depots and the potential for handling increased capacity and imports.
- 4.52 Whether the supply of aggregates could be met from a significant increase in supplies of secondary and recycled materials, to reduce the need to use primary sources also needs to be investigated. The WMLP should enable the maximum potential for this by providing sufficient opportunity for processing and storage facilities.
- 4.53 The potential for additional land-won resources should be explored, and any prospective sites assessed for possible inclusion in the WMLP

6. To maintain and improve water quality

Improving water quality

- 4.54 The Water Framework Directive requires that water bodies should be achieving “good ecological status”. Most of the Plan Area falls within the South East River Basin district. Local authorities must ensure that planning policies and spatial planning documents take account of the objectives of the South East River Basin Management Plan (December 2016). Results from the River Basin Management Plan show that 15% of surface waters have ‘good ecological status’ and 82% are at least ‘good’ ecological status. The River Basin Management Plan sets targets and actions up to 2027 which will require substantial improvement and protection of water quality in the Plan Area. Regarding bathing waters, the situation is favourable with all beaches in the Plan Area currently meeting the mandatory standards. Aquifers are classified according to the properties of the rocks and the overlying soils. Areas most vulnerable are where major aquifers lie close to the surface and is covered by only a thin freely-draining soil. The south west coastal area including Brighton & Hove and Eastbourne and the South Downs are the most vulnerable within the Plan Area.

Likely future without the Review

- 4.55 The quality of surface and groundwater should continue to improve, in part through policy in WMP which protects the quality of water, but also through the implementation of the River Basin Management Plan. The quality of bathing waters is likely to be maintained.

How can the Plan & Review affect this?

- 4.56 The WMLP should protect and improve the quality of surface water, groundwater, bathing water and aquifers. Minerals and waste development and related activities should meet environmental standards, whilst not intruding on other regulatory areas (as per NPPF guidance). Opportunities to improve water quality through waste and mineral development are limited, but should be sought out where feasible. The WMLP should have regard to the Water Framework Directive objectives and to the River Basin Management Plan’s measures and actions.

7. To seek the protection of and sustainable use of water resources

Water deficit and increased water consumption

- 4.57 The Environment Agency considers the South East as a ‘water-stressed area’. Domestic customers of Southern Water have a per capita consumption similar to the UK average, while South East Water’s customer’s consumption per capita is currently unknown.

- 4.58 The Plan Area is dependent on groundwater supplies. Source Protection Zones indicate the risk to groundwater supplies from potentially polluting activities and accidental release of pollutants. Zones have been defined for groundwater sources such as wells, boreholes and springs used for public drinking water supplies. The closer the activity the greater the risk. The majority of protection zones are in the south west of the Plan Area within the chalk formations of the South Downs.

Likely future without the Review

- 4.59 The Plan Area is likely to continue to be a water stressed area and with planned levels of housing growth and the effects from climate change it may be increasingly stressed. The quality of groundwater should not be affected as there are policies in place to prevent pollution from waste and minerals development.

How can the Plan & Review affect this?

- 4.60 The future of water resources depends upon full implementation of water company water resource plans. A range of interventions will be necessary including increasing supply and demand management through water efficiency savings. The WMLP should therefore encourage the minimisation of water use in the management of waste and mineral production to help with this.
- 4.61 The WMLP should have regard to ground water protection zones, particularly in site selection work and in development control policies.

8. To reduce risk and impact of flooding

Risk of flooding

- 4.62 Risk of surface water, fluvial, ground water and coastal flooding is an issue in the Plan Area.
- 4.63 There has been a slight increase in the number of properties located within the flood zone in East Sussex in recent years, and as a percentage of all properties is above both the regional and national averages. The number for Brighton & Hove appears to have remained relatively stable. However, these estimates have not been updated since 2010.
- 4.64 The nature of risk is likely to increase in severity as the effects of climate change are felt. Increased unseasonal rainfall, more extreme weather events and rising sea levels will elevate risk, particularly along the urbanized coastal strip.

Likely future without the Review

- 4.65 The risk of flooding is likely to increase with progressive climate change and increased levels of development leading to loss of permeable land.

How can the Plan & Review affect this?

- 4.66 The WMLP should have regard to the findings and recommendations of the Strategic Flood Risk Assessment, including the need for more detailed investigations in risk-prone areas. Developments should implement appropriate sustainable drainage systems.
- 4.67 The WMLP should not compromise sustainable management of coastal defences and the ability to adapt to climate change.

9. To limit the causes of and adapt to climate change.

Climate change

- 4.68 As a result of climate change, the Plan Area is forecast to experience: hotter, drier summers; warmer wetter winters; and increased frequency of extreme weather events. There are implications for flood risk, water resources, health, biodiversity, soils and the economy.
- 4.69 The Climate Change Strategy for East Sussex commits to four main courses of action:
- Mainstreaming - to ensure that the implications of climate change are considered and action taken in all our work and lives;
 - Engagement - to inform, advise and enable everyone in the community to play their part in reducing emissions and adapting to climate change;
 - Mitigation - to reduce greenhouse gas emissions from East Sussex and the share of those released elsewhere as a result of actions here; and
 - Adaptation - to respond to the risks and opportunities presented by a changing climate in East Sussex.
- 4.70 Government has set a national target of net-zero greenhouse gas emissions by 2050. It also requires that measures to adapt to climate change should be developed and implemented by local government.
- 4.71 The Brighton & Hove Sustainability Action Plan 2015 sets the following targets: by 2025 no more than 2% of waste by weight will be sent to landfill; and by 2025 70% of domestic waste will be reclaimed, recycled or composted, which reflects the targets in the WMLP)

- 4.72 The data continue to show an overall general decline in carbon dioxide emissions across the Plan Area, reflecting a similar position in the South East region. Per capita emissions in the Plan Area are low compared to regional and national data.
- 4.73 Methane is a far more potent greenhouse gas than carbon dioxide. The majority of emissions from the waste sector are currently associated with the emission of uncaptured methane from landfills.

Likely future without the Review

- 4.74 Climate change will continue with or without implementation of the Review. Greenhouse gas emissions in the Plan Area may continue to fall, although if economic recovery continues and planned housing and economic growth is achieved it is possible that levels of emissions will rise. However, levels of greenhouse gas emissions will be higher without implementation of the Review because minerals would have to be transported over longer distances.

How can the Plan & Review affect this?

- 4.75 The WMLP should contribute to achieving national, regional and local targets by reducing greenhouse gas emissions from the treatment and transport of waste and minerals. This should be achieved by diverting waste away from landfill in ways that:
- emit less greenhouse gases;
 - encourage a reduction in and modal shift away from road transport; and
 - reduce energy consumption and encourage the generation of renewable energy.
- 4.76 The WMLP should consider measures to adapt to climate change during site selection and in the design and orientation of development proposals.
- 4.77 Key policy directions include:
- provision of facilities to promote the movement of waste up the waste hierarchy;
 - consider heat generators to be co-located with heat users;
 - promote on-site waste minimization and reuse;
 - capturing and beneficial use of methane; and
 - considering the role of site restoration in flood risk management or water supply.

10. To protect air quality and reduce air pollution

Air pollution

- 4.78 The overall scale and impacts of emissions from waste and minerals facilities on air quality is relatively small when compared with emissions from other sectors such as transport. Nevertheless waste processes must comply with stringent emissions standards which are regulated by the Environment Agency.
- 4.79 Air quality is generally good in the Plan Area. However, there are a number of locations which exceed air quality thresholds and Air Quality Management Areas (AQMA) have been declared in Brighton & Hove, Newhaven, and Lewes. In Brighton & Hove, air quality outside the AQMA has improved, but within the AQMA there has been no improvement over the last 10 years.

Likely future without the Review

- 4.80 It is uncertain how air quality will evolve in the Plan Area in future. With increased housing and economic growth, traffic levels could increase leading to a reduction in air quality. However, if measures to promote sustainable transport choices are successful the Plan Area may achieve an improvement in air quality.
- 4.81 The location of minerals operations may depending on the routing of traffic affect the air quality in specific areas. If more minerals are sourced from outside the Plan Area this may have a negative impact.

How can the Plan & Review affect this?

- 4.82 The WMLP should consider existing air quality and seek to minimise any impact that might further reduce air quality that could arise from waste and minerals development and related activities. The WMLP should encourage sustainable transport patterns by:
- locating sites with a view to reduce the transport of waste and minerals; and
 - seeking a modal shift from road to rail and water where practicable.

11. To reduce adverse impacts of transporting waste and minerals on the environment

Road traffic

- 4.83 National and local policies emphasise the need to manage the transport network and deliver a modal shift to sustainable forms of transport.

- 4.84 There was a decline in vehicle kilometres in the Plan Area from 2008-2010, since when the level have started to rise again. Despite this, emissions from road transport have continued to decline steadily, reflecting the position regionally and nationally.
- 4.85 The amount of fuel consumed by road freight traffic in 2016 is slightly higher than it was in 2007 and 2008 in the Plan Area. This is similar to the regional and national pictures. This is likely to be due to an improvement in vehicle fuel efficiency.
- 4.86 The amount of freight handled at Shoreham in 2016 exceeded the previous high of 2011, whilst the amount through Newhaven has reduced by almost a half, and is well below the level in 2008. Freight through Rye continues to constitute a very minor proportion.

Likely future without the Review

- 4.87 Increased housing and economic growth and continued economic recovery are likely to increase traffic levels. However, if measures to promote sustainable transport choices are successful the Plan Area may see a sufficient modal shift to reduce road traffic.
- 4.88 Without the implementation of the Review, it is likely that construction materials will have to be transported greater distances, most likely by road; which would contribute to increased road traffic.

How can the Plan & Review affect this?

- 4.89 Minerals and waste activity makes up a small proportion of total traffic flow. However, the WMLP should seek to reduce the transportation of waste and minerals and encourage a shift from road to rail/water wherever possible to contribute to a reduction in traffic flow.
- 4.90 The level of freight handled can be maintained / increased by supporting proposals to maintain the supply of seaborne aggregates and marine dredged material. Greater use of rail to distribute aggregates could also be encouraged to support transport and environmental sustainability objectives.

12. To conserve and enhance important soil functions and types

Soil quality

- 4.91 Good soil quality is essential to a properly functioning environment and ecosystems as well as providing economic benefits. The national soil strategy states that developers and others must play their part in ensuring soils are adequately protected and soil functions are maintained wherever possible.

- 4.92 There is a lack of specific soil quality data in the Plan Area. What data does exist relates to the quantity and quality of agricultural land.
- 4.93 There has been a slight increase in the amount of agricultural land in Brighton and Hove and Lewes (combined), compared to a fall in both Hastings and Rother (combined) and Eastbourne and Wealden (combined). Eastbourne and Wealden had an 11% fall in the amount of agricultural land between 2007 and 2010. East Sussex has a low percentage of agricultural land classed as 'very good' and 'excellent' when compared to the South East region and England.

Likely future without the Review

- 4.94 The amount of agricultural land in the Plan Area is likely to fall in the future, due to the levels of planned housing and economic growth. This is unlikely to be significantly affected by the review.

How can the Plan & Review affect this?

- 4.95 The WMLP should support the preservation of the best and most versatile agricultural land (grades 1-3), specifically in site selection work and in drafting development management policies.
- 4.96 The WMLP should encourage the composting of biodegradable waste to use as a soil improver.
- 4.97 The WMLP should reflect national policy on the clean-up and development of contaminated land, and ensure that contaminants are not mobilised as a result of development.

13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment

High quality landscapes

- 4.98 Much of the Plan Area is recognised for its high quality landscape character. The South Downs National Park and High Weald AONB cover around two thirds of the Plan Area. The Low Weald is also a landscape of considerable historic complexity. The Plan Area also contains the first defined stretch of Heritage Coast in the country, between Seaford and Eastbourne.
- 4.99 East Sussex and Brighton & Hove possess highly-valued heritage assets, including listed buildings, scheduled monuments, conservation areas, registered parks, gardens and battlefields and wrecks. These formally designated assets make up only some 10% of

the heritage assets on the Historic Environment Record (HER). There is also much that has not yet been identified, including below-ground archaeological remains. The HER maps Archaeological Notification Areas which help to predict the archaeological potential around known sites.

Likely future without the Review

- 4.100 Although without implementation of the Review the Authorities will have less control over where development is located, policies in the WMP to protect landscape and historic assets should ensure that the quality of these assets is maintained.

How can the Plan & Review affect this?

- 4.101 The WMLP should ensure that new developments are sympathetic to the landscape character of the locality and that there are no unacceptable adverse effects on surrounding area and community. WMLP policies should not adversely affect the natural beauty of the National Park, the AONB or East Sussex's Heritage Coast.
- 4.102 The WMLP should encourage the restoration of landfill sites and mineral workings to enhance the landscape and countryside.

Lack of previously developed sites

- 4.103 The reuse of previously developed land is a national policy objective. However, the Plan Area does not possess a significant supply of such land, although no recent data is available to quantify this.

Likely future without the Review

- 4.104 Without the Review, it is likely that higher numbers of greenfield sites will be developed for minerals extraction or infrastructure.

How can the Plan & Review affect this?

- 4.105 The WMLP should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.

14. To protect, conserve enhance East Sussex and Brighton & Hove's biodiversity and geodiversity

Sites of biodiversity and geodiversity importance

- 4.106 The Natural Environment and Rural Communities Act 2006 places a duty on public bodies to ensure due regard to the conservation of biodiversity. Local authorities

should ensure no net loss of biodiversity and actively pursue opportunities to achieve a net gain.

- 4.107 There are six SACs, two SPA and one Ramsar site in the Plan area which are internationally important sites given protection by the EU Habitats and Birds Directives. Sites of Special Scientific Interest (SSSI) cover over 13,000 ha in the Plan Area, important for wildlife or geological interest. There are four National Nature Reserves and 10% of East Sussex is covered by Ancient Woodland. There are also designations of local importance including nearly 18,000 ha of Local Nature Reserves and 366 Sites of Nature Conservation Importance.
- 4.108 In the Plan Area 98% of SSSI units are favourable or recovering, which is above the target of 95%. Habitats and Species Action Plans show significant decline in the condition of certain habitats and species, demonstrating the need for action to reverse trends.

Likely future without the Review

- 4.109 Although without implementation of the Review the Authorities will have less control over where development is located and therefore it is possible that proposals will come forward for sites near to or including areas of biodiversity or geodiversity value, policies in the WMLP and NPPF to conserve and enhance international, national and local nature conservation sites, sites of geodiversity value and other areas including ancient woodland and land in agri-environment schemes should ensure that biodiversity and geodiversity are protected and enhanced.

How can the Plan & Review affect this?

- 4.110 The WMLP should: ensure that development and related activities do not have an unacceptable impact upon SSSI; ensure that Ancient Woodland is not lost, damaged or compromised by waste and mineral development or associated activity; aim to conserve and enhance biodiversity in development, use and aftercare; and have regard to Habitats and Species Action Plans.
- 4.111 SPA, SAC and Ramsar sites are internationally important sites and are strictly protected. A Habitats Regulations Assessment (HRA) should be undertaken to test if the Plan is likely to have a significant effect on these sites; Appropriate Assessment may also be necessary. The HRA will inform the WMLP and SA processes.

15. To increase energy efficiency and the proportion of energy generated from renewable Sources

Energy consumption

- 4.112 There is a general need to reduce energy consumption as part of measures to reduce the causes of climate change. Current levels of consumption are seen as unsustainable and opportunities should be taken to reduce consumption, improve efficiency and to generate renewable energy.
- 4.113 No data are available specifically on energy consumption by waste and mineral activities. However in the 5 years period between 2011 and 2015; in Brighton & Hove commercial and industrial gas consumption peaked in 2012 and has since reduced each year. Across East Sussex, the consumption fluctuates and has shown an overall increase. The regional and national trend is of a decrease. Electricity consumption per commercial and industrial consumer is considerably lower in the Plan Area than in the South East or nationally. This is likely to be because of the lack of heavy industry in the area. Electricity consumption decreased annually until 2011, however has been increasing every year since 2011 throughout the plan area.

Likely future without the Review

- 4.114 Policy in the WMP supports greater energy efficiency and use of renewable or low-carbon energy in waste and minerals development. This is supported by the WMSP.
- 4.115 It is unlikely that the Review will alter the existing trend and policy to support greater energy efficiency.

How can the Plan & Review affect this?

- 4.116 The situation is unfavourable given the high cost of energy and associated emissions of greenhouse gases. The WMLP should encourage: waste and minerals developments to reduce energy consumption, use energy efficiently and generate renewable energy; energy efficiency in new and existing waste and minerals developments. And the management of waste at higher levels of the waste hierarchy than currently, and promote the generation and use of low and zero carbon technology and encourage local energy supply chains.

Economic Objectives

16. To contribute to the growth of a sustainable and diversified economy

Population growth

- 4.117 All areas have seen an increase in population over the decade between censuses. Brighton & Hove has seen growth above the national and regional averages, while other parts of the Plan Area have had a lower growth than nationally and regionally. All areas are predicted to experience population growth over the decade to 2027. East Sussex is projected to see growth above the regional and national averages, while Brighton & Hove is likely to see below-average growth. Housing completions in the plan area peaked in 2011/2012 however were still below pre-recession levels and have since decreased again.

Likely future without the Review

- 4.118 Increases in housing completions in the Plan Area will lead to continued population growth, with or without implementation of the Review.

How can the Plan & Review affect this?

- 4.119 Increases in housing completions and population growth will create extra demands on waste and minerals infrastructure. The WMLP should provide suitable opportunity to provide the required infrastructure to meet future population increases and ensure that there are sufficient minerals and waste infrastructure/resources to support the completion and servicing of future housing.

Economic growth

- 4.120 The East Sussex economy has been underperforming for a number of years. GVA per head in East Sussex remains well below both the national and regional level. In contrast in Brighton & Hove, GVA per head is closer to the national average.
- 4.121 East Sussex has increased its GVA over the eight years from 2007 to 2015 more in line with the national and regional increase, whereas Brighton & Hove has remained fairly static.

Likely future without the Review

- 4.122 With the planned levels of housing and economic growth in the Plan Area, GVA is likely to grow. The future change in GVA per head is uncertain however, and depends on the type of jobs created.

How can the Plan & Review affect this?

- 4.123 The waste and minerals industry plays an important role in the economy of East Sussex and the UK as a whole. The WMLP should ensure that the minerals and waste industry supports the national and local economy.

17. To provide employment opportunities and develop and maintain a skilled workforce

Low employment in certain areas

- 4.124 Employment and income deprivation and inequality is a problem in some parts of the Plan Area. With the exception of Wealden all areas of the Plan Area have seen a decrease in the percentage of SOA among the 20% most deprived in England between 2010 and 2015.
- 4.125 The employment rate in the Plan Area has fluctuated slightly over the last five years, although currently it is at the same rate as nationally. Brighton & Hove, Eastbourne, Lewes and Wealden have an employment rate somewhat above the national average, while Hastings and Rother are somewhat below the national rate.

Likely future without the Review

- 4.126 If other plans and strategies are successful in their aims to achieve regeneration and growth in some of the more deprived parts of the Plan Area, then employment rates in these areas are likely to rise and the level of employment and income deprivation is likely to fall.

How can the Plan & Review affect this?

- 4.127 There is little scope for the WMLP to have a major impact on unemployment and skills. However, it should consider relative deprivation and inequality in some communities to avoid negative impacts or the widening of inequalities. It should also aim to maintain the current workforce and increase employment in waste and minerals activities to contribute to a reduction in unemployment for the Plan Area.

Characteristics of areas likely to be significantly affected

- 4.128 Minerals (quarrying, minerals handling and processing etc.) and waste management development tends to have specific local impacts on the areas where quarrying is taking place or the waste management operations occur. They also tend to result in vehicle movements which may affect people and environments near the road network being used. However, the routes taken by these vehicles will vary depending on the operations involved. Both quarrying and waste management operations can provide

social, economic and environmental benefits to the area of the Plan and beyond. This would be through the provision of minerals for development and managing waste in a safe manner. Minerals operations often occur where minerals are located, at wharfs, railheads or other locations nearby these facilities. However, other locations can also be used depending on the operation. Most built waste management facilities are usually built close to the market they serve, but beyond good access and an appropriate location of a building and operational space of a required size there are often no other specific site requirements. Operations involving landfill or land-raise sometimes have specific geological requirements for their safe operation.

- 4.129 An assessment of locations identified in the assessment as likely to be affected is detailed in section 8.

Habitats Regulation Assessment of areas of particular environmental importance

- 4.130 The Habitats Regulation Assessment of the draft RPD concluded that the plan was not likely to have significant effect on any of the areas listed in Table 2, directly or indirectly, alone or in combination with other plans.

5. Sustainability Appraisal Framework

Introduction

- 5.1 The second part of Stage A involves establishing a framework for undertaking the appraisal. This is essentially a set of sustainable development objectives against which the WMLP will be assessed. The sustainability issues and plans, policies, and programmes review inform the development of the Sustainability Appraisal Framework.

Objectives and decision-making criteria

- 5.2 The current Framework (which was first developed for the WMP) consists of a number of objectives and decision-making criteria that reflect relevant sustainable development policy issues. The objectives were first identified at the scoping phase for the SA of the WMP and were revised in response to consultation. Given the sustainability context and the issues identified in the previous session of this report, these objectives are still considered relevant and appropriate to use in the SA for this Review.

Social

1. To avoid negative effects and enhance, where possible, positive effects on health.

Decision-making criteria and interpretation: Will the strategy/option/policy...?

- a) minimise adverse impacts from current and future waste and minerals sites/developments and associated activities (i.e. transport) on the health of the surrounding communities (including reducing air, noise and waste pollution) (link with objective 2, 6, 10 and 11);
- b) minimise adverse impacts to health from waste through effective waste management practice;
- c) present an opportunity to benefit health or reduce inequalities.

Assumptions:

Regulatory bodies such as the Environment Agency and Environmental Health will operate to ensure emissions are within safe and acceptable limits. Therefore the Plan should not duplicate the role of those regimes.

Negative impacts on health may include perceived as well as actual impacts e.g. stress or anxiety by those who could potentially be affected by new facilities.

2. To protect the amenity of residents and neighbouring land uses.

Decision-making criteria and interpretation: Will the strategy/option/policy...?

- a) reduce the disturbance to communities from the transportation of waste and minerals including encouraging waste and minerals proposals to use suitable roads at sociable hours (link with objective 11);
- b) minimise noise/odour/dust nuisance of waste and mineral developments on sensitive receptors such as dwellings, hospitals, schools and other community facilities (link with objective 1);
- c) ensure appropriate design of facilities to reduce adverse visual impacts;
- d) ensure appropriate restoration of mineral workings and waste sites for community benefit (link with objective 5);
- e) avoid loss of recreational and public open space (link with objective 13).

Assumptions

Environmental Health will ensure that facilities operate within acceptable limits.

3. To improve equality and access to sustainable waste management.

Decision-making criteria and interpretation: Will the strategy/option/policy...?

- a) increase public access to recycling facilities;
- b) provide appropriate facilities to support Waste Collection Authorities in providing a sustainable and equitable service;
- c) promote integrated sustainable waste facilities within new developments;
- d) encourage small-scale community-based waste recycling/composting projects;
- e) promote and support local strategies and enterprises that involve sustainable waste management.

4. To minimise waste generation and disposal to land.

Decision-making criteria and interpretation: Will the strategy/option/policy...?

- a) reduce total waste arisings;
- b) increase the amount of waste being reused and recycled and actively promote the waste hierarchy;
- c) enable the delivery of facilities to recycle/reuse materials;

- d) raise awareness in order to increase levels of participation in sustainable waste management;
- e) safeguard sites suitable for location of waste management facilities from other proposed development.

Environmental

5. To ensure the sustainable use of local mineral resources.

Decision-making criteria and interpretation: Will the strategy/option/policy...?

- a) manage mineral resources efficiently;
- b) reduce need for raw minerals by maximising the use of secondary and recycled aggregates;
- c) encourage use of secondary materials such as mineral waste a substitute for primary construction materials;
- d) promote sustainable construction and demolition;
- e) ensure appropriate and effective restoration and after-use of mineral workings (link with objective 2 and 14);
- f) safeguard local and regionally significant minerals resources, important sites and depots including wharf and rail facilities. (link with objective 11);
- g) support neighbouring MLPs (e.g. Kent / West Sussex) and not conflict with them.

6. To maintain and improve water quality.

Decision-making criteria and interpretation: Will the strategy/option/policy...?

- a) minimise the pollution of surface water, groundwater (including aquifers) and coastal waters including contamination during waste processing and mineral extraction i.e. during access or through blockage;
- b) improve chemical and biological water quality;

Assumptions:

That regulatory bodies such as the Environment Agency will operate to ensure emissions to water are within safe and acceptable limits. Therefore the WMSP should not duplicate the role of those regimes.

7. To seek the protection of and sustainable use of water resources.

Decision-making criteria and interpretation: Will the strategy/option/policy...?

- a) conserve and maintain water resources;

- b) support a reduction in water consumption in waste management and mineral production;
- c) maximise re-use of wastewater.

8. To reduce risk and impact of flooding.

Decision-making criteria and interpretation: Will the strategy/option/policy...?

- a) prevent inappropriate development in flood risk areas;
- b) ensure development does not increase risk of flooding elsewhere;
- c) ensure no unacceptable impact upon tidal or fluvial flood defences;
- d) support sustainable construction and management of flood defences maximising the use of secondary materials;
- e) promote sustainable drainage;
- f) provide opportunities to reduce flood risk to third parties.

9. To limit the causes of and adapt to climate change.

Decision-making criteria and interpretation: Will the strategy/option/policy...?

- a) (Cross-cutting criteria from Objectives: 8, 10, 11, 15)
- b) reduce greenhouse gas emissions from the treatment and transport of waste and minerals;
- c) reduce methane emissions to air from landfill sites;
- d) ensure all waste and mineral developments/sites take into account the changing climate through location and design;
- e) minimise energy use by maximising use of recycled, recyclable and secondary resources.

10. To protect air quality and reduce air pollution.

Decision-making criteria and interpretation: Will the strategy/option/policy...?

- a) minimise the causes and levels of air pollution;
- b) support cleaner technology for waste and minerals management;
- c) take account of Air Quality Management Areas.

Assumptions

Regulatory bodies such as the Environment Agency and Environmental Health will operate to ensure emissions to air are within safe and acceptable limits. The WMLP does not duplicate the role of those regimes.

11. To reduce adverse impacts of transporting waste and minerals on the environment.

Decision-making criteria and interpretation: Will the strategy/option/policy...?

- a) encourage disposal/treatment of waste in the nearest appropriate installation to the source of waste;
- b) encourage local supplies of minerals where appropriate;
- c) encourage modal shift from road freight to rail and water where appropriate and feasible;
- d) encourage integration of complementary activities within minerals and waste sites such as processing, storage and recovery;
- e) safeguard wharves/rail heads to support bulk transport of minerals/waste (link with objective 5).

12. To conserve and enhance important soil functions and types.

Decision-making criteria and interpretation: Will the strategy/option/policy...?

- a) protect rare soil types and important soil functions and where appropriate and practicable improve soil quality;
- b) safeguard high quality agricultural land (1,2 and 3a) from development;
- c) encourage the de-contamination of contaminated soils;
- d) encourage composting of biodegradable waste that can be used as a soil improver;
- e) encouraging use of previously developed land.

13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.

Decision-making criteria and interpretation: Will the strategy/option/policy...?

- a) protect designated areas such as Areas of Outstanding Natural Beauty and South Downs National Park from inappropriate development;
- b) conserve the historic environment and its setting including listed buildings, archaeological remains, historic parks and gardens, conservation areas, and scheduled ancient monuments;
- c) limit adverse impacts on features of local historic or architectural interest and value;
- d) ensure appropriate protection of archaeological remains discovered;
- e) ensure appropriate design of facilities to reduce adverse visual impacts and protect local character and distinctiveness;

- f) ensure appropriate screening of mineral workings and waste facilities in environmentally sensitive areas and tourist areas;
- g) optimise use of previously developed land and existing buildings;
- h) ensure restoration of mineral workings maximise enhancement to the countryside (link with objective 5).

14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.

Decision-making criteria and interpretation: Will the strategy/option/policy...?

- a) protect designated areas from inappropriate development - Special Protection Areas, Special Areas of Conservation, Ramsar sites, Sites of Special Scientific Interest, National Nature Reserves, Ancient Woodland, Local Nature Reserves, Sites of Nature Conservation Importance;
- b) protect UK species and habitats of principal importance.
- c) provide appropriate mitigation measures to protect biodiversity and geodiversity especially in designated areas;
- d) ensure appropriate and effective restoration and after-use of mineral workings to maximise environmental and nature conservation benefits (link with objective 5);
- e) maximise waste/mineral sites biodiversity potential during as well as after their use.

15. To increase energy efficiency and the proportion of energy generated from renewable sources.

Decision-making criteria and interpretation: Will the strategy/option/policy...?

- a) promote generation and use of low and zero carbon technology;
- b) where landfill gas is generated maximise the energy recovered;
- c) encourage energy conservation and energy-efficient design in new waste and mineral developments/workings in line with the energy hierarchy (reduce, improve efficiency, generate renewables);
- d) encourage development of local supply chains, in particular biomass.

Economic

16. To contribute to the growth of a sustainable and diversified economy

Decision-making criteria and interpretation: Will the strategy/option/policy...?

- a) contribute to increase in gross value added per head, particularly in coastal sub-region;
- b) ensure provision of sufficient raw and recycled minerals to support sustainable economic growth including meeting the demand for the construction of housing and infrastructure;
- c) ensure appropriate waste facilities in East Sussex and Brighton & Hove to meet society's needs and support sustainable economic growth including supporting the local tourism industry;
- d) support the development of businesses involved in the reduction, reuse and recycling of waste;
- e) support technologies which will lead to cost effectiveness within waste and minerals industries;
- f) maximise the recovery value of waste;
- g) consider impact of waste/mineral facilities on other local businesses e.g. adjoining sites or those competing for sites.

17. To provide employment opportunities and develop and maintain a skilled workforce.

Decision-making criteria and interpretation: Will the strategy/option/policy...?

- a) increase the level and range of employment opportunities within the mineral and waste industries and especially in rural and deprived areas;
- b) contribute to a reduction in unemployment in the most deprived SOAs by encouraging use of the local labour market in waste and mineral industries;
- c) encourage the development of training opportunities, especially in deprived areas, to give people the necessary skills to work in the waste and mineral industries.

Appraisal Methodology

- 5.3 The appraisal assesses the revised and any new policy options and any proposed sites against each of the appraisal objectives set out in the Framework. The assessment draws upon the baseline data in this report to make a largely qualitative assessment of the likely effects which would arise from implementation of the revised policies.
- 5.4 In reporting the results of the appraisal, the following categories and symbols will be used to indicate the broad nature of the predicted effect:

+	effect likely to be positive
-	effect likely to be negative
•	no significant effect
?	effect unknown

- 5.5 If the appraisal objective is not relevant to a particular element of the revised policies being appraised, N/A will be given. Multiple symbols will be used (e.g. ++) to indicate a different scale of impact over time, or where the impacts of an option are better or worse than others. The effects will be also rated for their significance in terms of the importance for achieving each appraisal objective. Effects will be rated as high, medium or low significance, taking account of a number of factors. The factors will be:
- the expected scale of the effects or the degree to which the effects are likely to contribute to the achievement of the SA objective in the Plan Area overall;
 - the certainty or probability that the effect is likely to occur;
 - whether the effects would be permanent or reversible;
 - whether the effect will occur as a direct result of the Plan or not, in other words whether the Plan is key for achieving or controlling effects;
 - whether the effect is more strongly dependent on other interventions or other factors; and
 - how important the SA objective is to the scope of the Plan.
- 5.6 The assessment of significance will be indicated in the tables by colour:

Negative (-)	Mixed (+/-)	Positive (+)	
			Not relevant
			Low significance
			Medium significance
			High significance

- 5.7 There will be an assessment of effects over short, medium and long-term timeframes. The SA will also assess the likely significant cumulative effects of the revised policies in combination with other relevant plans and projects. It will also consider the interrelationships between effects. Where negative effects are identified, recommendations to mitigate these effects will be made, where appropriate.

Difficulties encountered

- 5.8 This assessment has been undertaken using the best available information at the time of writing. However, it has been subject to a number of limitations:
- *Data availability* - This assessment, as a starting point, updated the data collected for the WMSP SA. Most of the datasets assessed previously were available, but not all of them. Likewise it has not been possible to, when undertaking assessments, assumptions were made and best judgement was used to identify potential effects.
 - *Relevance & data quality* - In order to provide a holistic view the datasets sourced sometimes only have loose connection to topics that the Plan can influence. Data may, as it is sourced from a range of sources, be of variable quality and reliability. Caution should be used when interpreting this data and the original data source should always be consulted if being used in other contexts.
 - *Uncertainty & Generalisations* - the SA has had to take a proportional approach in relation to assessing the potential effects of the Plan. Consequently only those most relevant effects have been identified, it has not been possible to identify every potential effect that may occur. This also applies to the identification of the effects on locations.

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- *Significance and likelihood* - In the absence of empirical measures of significance and likelihood professional judgement and broad terms had to be used to describe the significant and likelihood of effects occurring.

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6. Appraisal of Options

- 6.1 The Authorities identified options by examining the issues that were to be addressed by the Review and then within these topics considered the possible options. The starting point for all options was, where feasible, the continuation of the status quo. Alternatives were then developed as part of the plan preparation process based on the available evidence.
- 6.2 The topics, issues and options considered and a summary of the findings are shown below. A summary of the assessment is shown on the following page; complete assessments can be found in the [Technical Annex E: Options Appraisal](#).

Topic A: Provision of Aggregates

Issue A1. Source of aggregate supply (excluding soft sand)

- *Option A: Maintain existing mix through additional land-won site identification.* - The Plan would seek to retain the existing mix of land-won, recycled, marine, and imported aggregate. A Site at Lydd (R-S1-005) would be allocated. Marine imports naturally increase at Newhaven owing to existing consents.
- *Option B: Recycled and marine aggregate provision with road and rail imports. (No land-won)* - The Plan would source aggregate from existing recycled aggregate facilities, marine sources landed at existing wharves in the Plan Area. Shortfall would be sourced from importation from outside of the Plan Area by road and rail. No new land-won sites are allocated. Marine imports increase at Newhaven though existing consents.

Summary & Conclusion

Both options will contribute to the growth of a sustainable and diversified economy through ensuring the continued provision of minerals. Option A performs better than Option B in relation to the use of local minerals and consequently in matters related to transport, such as climate change, and the distances in which minerals will need to be transported. However, it has been assessed that Option A would have highly significant negative effects on protected geology owing to extraction occurring in a protected area. The potential effects of extracting minerals near a known archaeological site would require information to assess the effect. Overall, Option B is considered to be more sustainable option.

Topic B: Safeguarding Minerals and Minerals Infrastructure

Issue B1. Prior Extraction of Minerals

- *Option A: Status Quo* - Under the existing Waste and Minerals Local Plan prior extraction is currently addressed through the last sentence in Policy SP8 which states: "The prior extraction of minerals should be considered by the MPA in relation to any non-minerals development".
- *Option B: Inclusion of specific prior extraction policy.* - Introduction of a specific policy requiring prior extraction prior to the implementation of non-minerals related development where practicable and feasible.

Summary & Conclusion

In comparison, in retaining the status-quo (Option A), the inclusion of a specific policy for prior extraction (Option B), was assessed to have positive effects in relation to ensuring the sustainable use of local minerals and reducing the adverse impacts of transporting waste and minerals on the environment. Option B is considered to be more sustainable of the two options.

Issue B2. Safeguarding Minerals Infrastructure

- *Option A: Status Quo* - This reflects the existing adopted policy position, i.e. Policy WMP14.
- *Option B: Strengthening policy through reference to the Agent of Change principle and existing safeguarding to cover East Quay* - This option extends the safeguard wharves at East Quay, Newhaven which are not presently safeguarded and strengthening of the safeguarding policy by making reference to the Agent of Change.

Summary & Conclusion

In comparison, in retaining the status-quo (Option A), Strengthening policy through reference to the Agent of Change principle and existing safeguarding to cover East Quay (Option B), was assessed to have positive effects in relation to protecting neighbouring amenity and ensuring the sustainable use of local minerals. Option B is considered to be more sustainable of the two options.

Topic C: Policy Effectiveness

This topic seeks to improve policy without altering the existing strategy. An appraisal of options is not applicable in this instance.

Topic D: Clay Provision

Issue D1. Provision of Specialist Clay

- *Option A: Status Quo* - No additional allocations, extraction to cease when present allocation exhausted.
- *Option B: Allocation of Aldershaw Tiles.* - Allocate extension to Aldershaw Tiles extending the lifespan of the quarry.

Summary & Conclusion

Allocating extension to Aldershaw Tiles (Option B) will enable the continued options of the quarry and brickworks which produces specialist tiles for use in construction. In respect of this SA it has been assessed that it would continue to ensure the sustainable use of local mineral resources, support the growth of a sustainable and diversified economy and its workforce. It would also result in existing traffic patterns continuing and material not being transported from further away, which may assist in limiting the CO2 emissions which cause climate change. However, it would result in the destruction of a small area of ancient woodland. Whilst the ancient woodland is irreplaceable, it may possible to provide some mitigation of compensatory planting as part of a restoration scheme.

Not allocating the site (Option A) would likely result in the closure of the site, with effects approximate to the reverse of the above. On balance, Option B is assessed to be the more sustainable of the two.

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Objective	Obj1.	Obj2.	Obj3.	Obj4.	Obj5.	Obj6.	Obj7.	Obj8.	Obj9.	Obj10.	Obj11.	Obj12.	Obj13.	Obj14.	Obj15.	Obj16.	Obj17.
Topic A: Provision of Aggregates																	
<i>Issue A1. Source of aggregate supply (excluding soft sand)</i>																	
Option A. Maintain existing mix through additional land-won site identification.	•	•	N/A	N/A	+	N/A	N/A	•	•	•	+	N/A	?	---	N/A	++	•
Option B. Recycled and marine aggregate provision with road and rail imports. (No land-won)	•	•	N/A	N/A	-	N/A	N/A	•	-	-	-/•	N/A	•	N/A	N/A	++	•
Topic B: Safeguarding Minerals and Minerals Infrastructure																	
<i>Issue B1. Prior Extraction of Minerals</i>																	
Option A. Status Quo	N/A	N/A	N/A	N/A	•	N/A	N/A	N/A	N/A	N/A	•	N/A	N/A	N/A	N/A	N/A	N/A
Option B. Inclusion of specific prior extraction policy.	N/A	N/A	N/A	N/A	+	N/A	N/A	N/A	N/A	N/A	+	N/A	N/A	N/A	N/A	N/A	N/A

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<i>Issue B2. Safeguarding Minerals Infrastructure</i>																	
Option A. Status Quo	N/A	•	N/A	N/A	•	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Option B. Strengthening policy through reference to the Agent of Change principle and existing safeguarding to cover East Quay	N/A	+	N/A	N/A	+	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Topic C: Policy Effectiveness																	
This topic seeks to improve policy without altering the existing strategy. An appraisal of options is not applicable in this instance.																	
Topic D: Clay Provision																	
<i>Issue D1. Provision of Specialist Clay</i>																	
Option A. Status Quo	N/A	•	N/A	N/A	-	N/A	N/A	N/A	•	N/A	-	N/A	•	•	N/A	-	-
Option B. Allocation of Aldershaw Tiles.	N/A	•	N/A	N/A	+	N/A	N/A	N/A	+	N/A	+	N/A	?	-	N/A	+	+

7. Appraisal of Sites

- 7.1 All mineral extraction sites submitted as part of the CfES have been subject to a SA assessment. The sites have been appraised against the SA objectives in the appraisal framework and an assessment of the likely significant effects of development at each site has been undertaken; see [Technical Annex D: Appraisal of Sites](#) for the individual site assessments. In doing these assessments, the SA has made reference to the site assessment work carried out in-house by Council officers and set out in the ‘*Site Assessment Document*’, which will be published in due course. Publicly available data on local conditions in the vicinity of sites was also used. Recommendations have been made for each site for ways in which the predicted negative effects could be mitigated and for capitalising on opportunities for benefits. These have been a consideration in the selection of site and the drafting of the site profiles. This section should be read in combination with the options assessment above. Of the two sites proposed for consideration the RPD makes one allocation at the Aldershaw Tiles site (M/ALD). A summary of the site assessment is shown below:

Objective	R-S1-001	R-S1-005
1. Health	N/A	N/A
2. Neighbouring Amenity	•	-/+
3. Equality & Access	N/A	N/A
4. Waste Minimisation	N/A	N/A
5. Sustainable Minerals Use	++	++
6. Water Quality	N/A	N/A
7. Water Resource	N/A	N/A
8. Flood Risk	N/A	•
9. Climate Change	+/-	+/-
10. Air Quality and	•	-

Objective	R-S1-001	R-S1-005
Pollution		
11. Transport	+	+
12. Soil	•	•
13. Historic & Built Environment	•/?	?
14. Biodiversity / Geodiversity	--	---
15. Renewable Energy	N/A	N/A
16. Economy	+	+
17. Employment	+	+

8. Appraisal of Plan and Policies

- 8.1 This section contains the results of the assessment of the proposed revised policies.

Plan Objectives

- 8.2 The Waste and Minerals Plan (WMP) contains eight strategic objectives which set the direction of the Plan. These have remained unchanged during the preparation of the Waste and Minerals Sites Plan (WMSP) and the Revised Policies Document. Previous SAs have undertaken compatibility assessments between the WMP / WMLP strategic objectives and the SA objectives. Given that neither set of objectives have been altered, an assessment has not been undertaken as part of this SA. A reproduction of the assessment from the WMSP can be found in [Technical Annex F: Compatibility Check of Strategic Objectives](#).

Policy Assessment

- 8.3 An assessment of each of the draft policies was undertaken, making recommendations where appropriate. The individual policy assessments can be found in [Technical Annex G: Policy Appraisal](#). These assessments were then reordered and grouped by objective so as to provide an assessment of the RPD as a whole. This can be found in [Technical Annex I: Combined Policy Appraisal](#). A summary of the assessment is shown below in the table below.

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Objective	RV1	RW1	RM1	RM2	RM3	RM4	RM5	RM6	RM7	RD1
1. Health			+	N/A		N/A	N/A			N/A
2. Neighbouring Amenity			+ / -	•		N/A	+			N/A
3. Equality & Access			N/A	N/A		N/A	N/A			N/A
4. Waste Minimisation			N/A	N/A		N/A	N/A			N/A
5. Sustainable Minerals Use			+	+ / ?		+	+			N/A
6. Water Quality			N/A	N/A		N/A	N/A			N/A
7. Water Resource			N/A	N/A		N/A	N/A			N/A
8. Flood Risk			N/A	N/A		N/A	N/A			N/A
9. Climate Change			+	+ / ?		N/A	N/A			N/A
10. Air Quality and Pollution			+ / -	N/A		N/A	N/A			N/A
11. Transport			+ / -	+ / ?		+	N/A			N/A
12. Soil			N/A	N/A		N/A	N/A			N/A
13. Historic & Built Environment			+	• / ?		N/A	N/A			•
14. Biodiversity / Geodiversity			-	- / + / ?		•	N/A			• / ?
15. Renewable Energy			N/A	N/A		N/A	N/A			N/A
16. Economy			++	+		?	N/A			• / ?
17. Employment			+	+		N/A	N/A			N/A

- 8.4 As set out above the Plan is likely to have different effects on different SA objectives. Some may be more affected than others. In broad terms the plan is likely to affect the following objectives:

<i>Most affected</i>	5. Sustainable use of minerals 11 Transport 16. Economy
<i>Moderately affected</i>	14. Biodiversity / Geodiversity
<i>Least affected</i>	1. Health 9. Climate Change 10. Air quality and pollution 17. Employment

- 8.5 The revised policies are likely to have greatest impact in relation to the sustainable use of minerals (Objective 5), transport (Objective 11), and the economy (Objective 16).
- 8.6 The assessment of the RPD indicates that is likely to positively support the sustainable use of local mineral resources (Objective 5). This would be achieved through Policy RM1 emphasising the use of secondary and recycled minerals and continued emphasis on the use of existing mineral import facilities, Policy RM4 seeking prior extraction of safeguarded mineral resources and Policy RM5 that safeguards minerals infrastructure to ensure the continuing provision of minerals. Policy RM2 also ensures the continuing provision of specialist clay.
- 8.7 The continued provision of minerals under Policies RM1 and RM2 also is likely to contribute to the growth of a sustainable economy (Objective 16) by providing required resources for construction sector. However, the requirement for prior extraction (RM4) may affect the viability of some sites; the extent to which this will be the case is unknown. Likewise the requirement for net-gain in biodiversity introduced in Policy RD1 at present has been assessed to be neutral compared with existing policy, but if a specific requirement were to be introduced, as is being considered under the Environment Bill, this may place an additional cost on development and affect development viability.
- 8.8 In relation to reducing the adverse impacts of transporting waste and minerals on the environment (Objective 11) the revised policies have been assessed to be likely to have a combination of mixed and positive effects. By providing minerals through the use of existing recycled aggregate and minerals import facilities such as wharves, ports, and railheads, the existing transport patterns will change as only land-won source of sharp sand and gravel in the Plan Area at Lydd reaches the end of its permitted life. The revised policies anticipates that the material provided at Lydd is likely to be replaced by supply from the ports and railheads within the Plan Area (Shoreham, Newhaven, and

Rye). The change in HGV patterns will have a positive effect in some locations, whilst negative in others depending on the travel patterns. Travel patterns and their effects will to a lesser extent be affected by both the continued provision of clay (RM2) and the prior extraction requirement (RM4) will assist in reducing the distances that minerals are transported.

- 8.9 The RPD is likely to have moderate mixed effects in relation to biodiversity / geodiversity (Objective 14). The allocation of clay extraction at Aldershaw Tiles (RM2) will result in the destruction of area ancient woodland where the extraction is proposed. The RPD indicates that the extraction is very small scale and consequently the area affected will be limited. This was assessed to be likely to have a negative impact on impact on the biodiversity in that area. In a similar vein, Policy RM1 seeks to meet the Plan Areas demand for sharp sand and gravel, in part, by the importation of marine dredged aggregate. Marine dredging was assessed to may have negative effects on marine biodiversity and marine habitats where it occurs. However, the assessment and mitigation of this effect will have been subject of assessment by the Marine Management Organisation in preparation of its Marine Plans and marine dredging licensing regime. Lastly on this topic, Policy RD1 was, under the current circumstances, assessed to be neutral, i.e. have a similar effect as the existing policy WMP27, with a caveat that in the medium to long term, if the Environment Bill is pursued and a specific level of net-gain was mandated, that the policy may have a more positive effect on biodiversity it would otherwise.
- 8.10 To a lesser extent the RPD may have minor effects on public health (Objective 1), climate change (Objective 9), air quality and pollution (Objective 10) and employment (Objective 17). The effects on health are likely to be indirectly positive as a result of the revised policies further enabling the planned development of villages, towns and cities through the provision of minerals. Minor indirect positive effects may occur in relation to climate change as a consequence of the promotion of recycled and secondary aggregate (RM1) which should result in reduction of raw material used; and the continued local provision of clay (RM2) may have a minor positive effect by reducing overall travel distances and associated CO2 production. Policy RM1 emphasis on utilising existing facilities and wharfs, ports and railheads for imports indicates that transport will be concentrated around these facilities. As these are existing facilities it is likely that these have access to suitable roads, this in combination with the promotion of sustainable transport in the form of marine and rail imports may help avoid additional pollution in areas with existing air pollution problems. Policies RM1 and RM2 were assessed to have positive effects in relation to employment

opportunities as a consequence of maintaining the existing recycled aggregate, import facilities and clay extraction.

8.11 The remaining four policies were assessed to be proposing alterations that are considered to not significantly alter the existing policy direction as set out in the WMP and WMSP. Consequently, the proposed alterations have been assessed to be *de minimis* for the purposes of this Sustainability Appraisal. This applies to the following policies:

- RV1 Minerals and Waste Development affecting the South Downs National Park and High Weald Area of Outstanding Natural Beauty;
- RW1 Sustainable Locations for Waste Development;
- RM3 Safeguarding Minerals Resources;
- RM6 Safeguarding facilities for concrete batching etc.; and
- RM7 Minerals Consultation Areas.

Assessment of areas likely to be affected

8.12 While undertaking the assessment of revised policies, for each objective of each policy, where it could be identified that a location may be affected this was recorded in the Policy Assessment as shown in [Annex G: Policy Appraisal](#). These locations include places names as well as abstract locations such as ‘Ports and Wharves’. In broad terms:

8.13 There is likely to be a positive effect on the whole Plan Area as a result of the continued provision of minerals for use in construction. Positive economic and employment effects may also be seen at the ports, wharves and minerals facilities involved in the recycling and importation of aggregate. Within the Plan Area these facilities are located at the ports of Shoreham, Newhaven and Rye. However, the provision of aggregate through marine importation may have a localised negative effect on the licensed and allocated marine areas for aggregate dredging (outside of plan area). This negative effect will have been considered when the relevant marine plan was being prepared and areas for dredging being licenced.

8.14 Traffic patterns involved in enabling the continued import of material into the Plan Area and their effects on the roads and areas near the roads (for example, effects on amenity and air quality) are likely to remain broadly similar to the status quo. The numbers of HGV are likely to increase in proportion to minerals demand in any given areas. Existing HGV travel patterns are likely originating from Lydd Quarry is likely to change as the quarry reaches the end of its permitted reserves. The change in this is

likely to be proportionate to the mineral provision from the quarry. The Plan anticipates that the material provided at Lydd is likely to be replaced by supply from the ports and railheads within the Plan Area (Shoreham, Newhaven, and Rye).

- 8.15 Safeguarded Minerals facilities and infrastructure at wharves and ports are likely to benefit from increased protection as a consequence of the incorporation of the Agent of Change principle. Development within Mineral Safeguarding Areas, i.e. areas near Plumpton and Ditchling as shown on the Local Policies Map, may be affected by the requirements of Policy RM4 Prior Extraction of Minerals.
- 8.16 There are likely to be small scale localised effects in relation to the allocation (0.2 Hectares) at the Aldershaw Tiles site. The extraction will enable the continued supply of clay for specialist tiles and all the economic effects associated with that, but this will have a negative effect on the ancient woodland which will be destroyed as a result of extraction.

Cumulative effects of the revised policies and Interaction with other policies and plans

- 8.17 The WMLP interacts most with other land-use / spatial plans such as Local Plans within the Plan Area and the Marine Plan adjacent to the Plan Area. It will also interact with the Newhaven Port
- 8.18 The Newhaven Enterprise Zone website recognises the importance of North Quay, Newhaven in the WMP. The minerals facility at East Quay, Newhaven is not referred to.
- 8.19 As documented above, the assessed likely effects of the revised policies are broadly positive and will support the planned development within those documents; the reliance on existing minerals facilities and infrastructure is likely to limit the potential negative effects within the Plan Area and conflict with other Local Plans. It is considered that the Plan is likely to complement the existing Local Plans in the areas.
- 8.20 For the purposes of this assessment, it has been assumed that, owing to the way the amount of minerals each Minerals Planning Authority should provide as set out in the NPPF / NPPG, it is likely that the future demand of minerals from the Plan Area is either already incorporated within their strategies or will be a consideration as future plans are prepared.
- 8.21 It is understood that the Authorities are pursuing discussions with the relevant district and borough councils within the Plan to confirm that this assessment is correct, and with those involved with the Newhaven Enterprise Zone to ensure that the plans

compliment one-another. It is also understood that the Authorities are also pursuing discussions with the Marine Management Organisation and the other Minerals Planning Authorities, from which minerals are likely to be imported, to ensure that the reliance on imports is an appropriate strategy.

Likely significant effects on Sites of International Nature Conservation Importance

- 8.22 This assessment has not identified any likely significant effects on Sites of International Nature Conservation Importance. No direct impacts have been identified. A potential indirect impact on Sites of International Conservation Importance was identified in the form of changing patterns of traffic movements through the Ashdown Forest SAC. However, this was discounted owing to two factors: Firstly, the strategy set out in the Plan uses existing permitted facilities and these should already be accounted for in this and other assessments assessing the effect on the Ashdown Forest SAC. And secondly, given the location of the existing minerals facilities and Lydd Quarry the levels of minerals HGV traffic through the Ashdown Forest SAC is unlikely to change significantly.

Summary of Waste and Minerals Local Plan (“the Plan”) Assessments of Policy

- 8.23 This SA has focussed primarily on Revised Policies as this is where change is being proposed. These policies, should they be adopted, will be read in combination with the other policies of the WMLP and other relevant Development Plan Documents. Whilst the significant effects of these policies has been identified and assessed through the policy appraisal, it has not been possible to identify all permutations of how the policies may interact with each other; that is best assessed through their application in the determination of planning applications. However, to give a complete overview of the Waste and Minerals Local Plan (“the Plan”) the tables on the following pages shows the summary of all the relevant assessments for the Waste and Minerals Local Plan after the proposed alterations made by the RPD have been incorporated.
- 8.24 Note, the assessment undertaken for the SA of the WMP policies used a different scoring system, but this is still considered to provide a valid indication of the assessment of the policies. This is set out below:

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✓	Positive impact
✓?	Possible positive impact
?	Uncertain / unknown
x?	Possible negative impact
x	Negative impact
∅	No significant impact or link to objective
✓ (minor) ✓✓✓(major)	

8.25 Both the WMSP and the RPD used/use the method documented in this document.

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Objective	Overarching Strategy					Providing for Waste													
	WMP1	WMP2 RV1	WMP3a,b&c	WMP3d&e	WMP4	WMP5	WMP7a-f & WMP7b RW1	SP1	SP2	SP3	SP4	SP5	WMP8a,b&c	WMP9a	WMP9b	WMP10	WMP6	SP6	SP7
1. Health	J?	0	?	?	0	?	?	•	•	•	•	•	?	?	?	?	?	+/?	+/?
2. Neighbouring Amenity	J?	J	?	?	0	?	?	+/-	+/-	+/-	+/-	•/?	?	?	?	?	?	+/-/?	+/?
3. Equality & Access	0	0	?	J	0	?	J	•	•	•	•	•	0	0	0	0	0	+/?	+/?
4. Waste Minimisation	0	0	J	J	J	J	J	+/++	+/++	+/++	+/++	++	0	J?	J?	0	J	+/?	+/?
5. Sustainable Minerals Use	J	0	J	J	J	J	J?	?	?	?	?	?	0	0	0	0	J	+/?	+/?
6. Water Quality	0	0	J	0	0	0	?	•/?	•/?	•	•	•/?	J?	?	J?	J	?	?/•	N/A
7. Water Resource	0	0	0	0	0	0	0	N/A	N/A	N/A	N/A	N/A	0	0	0	0	0	N/A	N/A
8. Flood Risk	J	0	0	0	0	0	?	•/-	•/-	-	•	•/?	0	?	?	?	0	•/-	N/A
9. Climate Change	J	0	J	J	J	J	J	+	+	+	+	+	?	J?	J?	?	J	+/?	+/?
10. Air Quality and Pollution	?	0	?	0	0	?	x?	•/-	•/-	•	•	•	x	?	?	?	J?	+/-/?	+/?
11. Transport	J	0	?	J	0	J?	J	+/?	+/?	+/?	+/?	+	x	J?/J	J?/J	?	J	+/?	+/?
12. Soil	J	0	0	0	0	0	J?	+/-/?	+/-/?	-/?	-/?	•/?	J	J?	0	?	?	+/-/?	+/?
13. Historic & Built Environment	J	J	?	0	0	?	?	+/-	+/-	-/?	-/?	•/?	J	x?	x?	?	?	+/-/?	+/?
14. Biodiversity / Geodiversity	J	J	?	0	0	?	?	-	-	-	-	-/?	J	x?	x?	J	?	+/-/?	+/?
15. Renewable Energy	J	0	J	0	J	J	J?	?/+	?/+	?/+	?	?	J	J?	J?	0	0	+/?	+/?
16. Economy	J	0	J	J	J	J	J	+/?	+/?	+/?	+/?	+/?	J?	J?	J?	J	J	+/?	+/?
17. Employment	J?	0	0	0	0	0	0	+	+	+	+	+	0	?	?	0	0	+	N/A

Continued over leaf...

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Objective		Providing for Minerals										Overarching Policies							
		RM1	WMP12	WMP13	RM2	WMP14 RM3‡	SP8 RM3 ‡	RM4	RM5	SP10 RM6	SP11 RM7	WMP16	WMP17	WMP18	SP99	WMP20	WMP21	WMP22	
1. Health	Continued from over leaf	+	0	?	N/A	0	N/A	N/A	N/A	+/?	+/?	?	?	/?	/?	/?	0	?	Continued over leaf...
2. Neighbouring Amenity		+/-	0	?	•	0	N/A	N/A	+	+/?	+/?	?	?	/?	/?	0	?	?	
3. Equality & Access		N/A	0	0	N/A	0	N/A	N/A	N/A	N/A	N/A	0	0	0	0	/?	/?	0	
4. Waste Minimisation		N/A	/?	/?	N/A	0	N/A	N/A	N/A	N/A	N/A	0	0	0	/?	0	/?	/?	
5. Sustainable Minerals Use		+	/?	/?	+/?	/?	+/?	+	+	+/?	+/?	0	0	0	/?	0	/?	/?	
6. Water Quality		N/A	0	x?	N/A	0	N/A	N/A	N/A	N/A	N/A	?	0	0	?	0	0	?	
7. Water Resource		N/A	0	0	N/A	0	N/A	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	
8. Flood Risk		N/A	0	?	N/A	0	N/A	N/A	N/A	N/A	N/A	?	0	0	?	0	0	0	
9. Climate Change		+	?	/?	+/?	0	N/A	N/A	N/A	N/A	N/A	x	?	/?/?	/?	0	/?	/?	
10. Air Quality and Pollution		+/-	?	/?	N/A	0	N/A	N/A	N/A	N/A	N/A	?	0	/?/?	/?	0	0	/?	
11. Transport		+/-	0	/?	+/?	/?	+/?	+	N/A	N/A	N/A	?	0	/?/?	/?	0	/?	/?	
12. Soil		N/A	?	x?	N/A	0	N/A	N/A	N/A	N/A	N/A	?	0	0	?	0	0	?	
13. Historic & Built Environment		+	0	x?	•/?	0	N/A	N/A	N/A	N/A	N/A	x	/?/?	0	?	0	0	?	
14. Biodiversity / Geodiversity		-	0	x?	-/+/?	0	N/A	•	N/A	N/A	N/A	x	/?/?	0	?	0	0	?	
15. Renewable Energy		N/A	0	0	N/A	0	N/A	N/A	N/A	N/A	N/A	x	0	0	0	0	0	0	
16. Economy		++	/?	/?	+	/?	+/?	?	N/A	+/?	+/?	/?/?	0/?	/?	/?	0/?	0	/?	
17. Employment		+	0	0	+	0	+/?	N/A	N/A	+/?	+/?	/?	0	0	0	/?	0	0	

‡ Policies WMP14 and SP8 are merged into Policy RM3. Both assessments are relevant.

Objective	Continued from over leaf									
	WMP23	WMP23	WMP24	WMP24	WMP25	WMP26	WMP27	RD1 *	WMP28	
1. Health	Ø	Ø	Ø	Ø	✓	✓	Ø	N/A	Ø	
2. Neighbouring Amenity	✓	✓	Ø	Ø	✓	✓	✓	N/A	✓	
3. Equality & Access	Ø	Ø	Ø	Ø	Ø	Ø	Ø	N/A	Ø	
4. Waste Minimisation	Ø	Ø	✓	✓	Ø	Ø	Ø	N/A	Ø	
5. Sustainable Minerals Use	Ø	✓	Ø	Ø	Ø	Ø	Ø	N/A	Ø	
6. Water Quality	Ø	✓	Ø	Ø	Ø	Ø	✓	N/A	✓	
7. Water Resource	Ø	✓	Ø	Ø	Ø	Ø	Ø	N/A	✓	
8. Flood Risk	Ø	Ø	✓	Ø	Ø	Ø	Ø	N/A	✓	
9. Climate Change	Ø	Ø	✓	Ø	Ø	Ø	Ø	N/A	✓	
10. Air Quality and Pollution	Ø	✓	✓	✓	✓	Ø	Ø	N/A	Ø	
11. Transport	Ø	Ø	✓	Ø	✓	✓	Ø	N/A	Ø	
12. Soil	Ø	✓	Ø	Ø	Ø	Ø	✓	N/A	Ø	
13. Historic & Built Environment	✓	Ø	Ø	Ø	Ø	Ø	✓	•	Ø	
14. Biodiversity / Geodiversity	Ø	Ø	Ø	Ø	Ø	Ø	✓	•/?	✓	
15. Renewable Energy	Ø	Ø	✓	✓	Ø	Ø	Ø	N/A	Ø	
16. Economy	Ø	Ø	Ø	✓	Ø	Ø	Ø	•/?	Ø/✓	
17. Employment	Ø	Ø	Ø	Ø	Ø	Ø	Ø	N/A	Ø	

* The assessment for Policy RD1 is a combination of the assessment for WMP27 and RD1.

9. Monitoring

- 9.1 As required by the SEA Directive, a number of recommendations are made for indicators to monitor the likely significant impacts of the revised policies. These are set out in Table 4 corresponding to the relevant impacts identified and summarised in the preceding chapters of this report.
- 9.2 One of the aims of monitoring as specified by the SEA Directive is to identify unforeseen adverse effects in order to be able to take appropriate remedial action. To enable this to be done, recommendations are also made in Table 4 for monitoring potential sustainability impacts that are not expected to occur as foreseen by the appraisal.
- 9.3 An Annual Monitoring Report will be produced to monitor the implementation of the WMP and WMSP, and the recommendations given below for monitoring should be incorporated within this.
- 9.4 Recommendations below only relate to those objectives that have been used in the assessment on the Draft Revised Policies, these should be read in with those recommendations made in the SAs for the WMP and WMSP.

East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan: Revised Policies Document
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Table 4 Monitoring Recommendations

SA Objectives	Recommended Indicators
1. To avoid negative effects and enhance, where possible, positive effects on health.	Number of complaints about health impacts of waste and minerals developments
2. To protect the amenity of residents and neighbouring land uses.	Number of enforcement cases regarding amenity impacts
5. To ensure the sustainable use of local mineral re-sources.	Capacity for secondary and recycled minerals production in Plan Area Capacity for landing of marine-borne minerals in the Plan Area
8. To reduce risk and impact of flooding.	Planning permissions granted contrary to Environment Agency advice
9. To limit the causes of and adapt to climate change.	Tonnage of minerals transported by rail and water
10. To protect air quality and reduce air pollution.	Number of facilities breaching permit conditions
11. To reduce adverse impacts of transporting waste and minerals on the environment.	Number of enforcement cases regarding traffic transporting waste and minerals impacts
12. To conserve and enhance important soil functions and types.	Hectareage of greenfield sites lost to waste and minerals development
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	Number of enforcement cases regarding landscape impacts Number of enforcement cases regarding impacts on historic assets
14. To protect, conserve and where appropriate enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	Amount of net-gain in biodiversity achieved
16. To contribute to the growth of a sustainable and diversified economy.	Number of minerals businesses operating in Plan Area Tonnage of secondary and recycled minerals produced
17. To provide employment opportunities and develop and maintain a skilled work-force.	Number of waste management businesses operating in Plan Area Number of minerals businesses operating in Plan Area

10. Next steps

- 10.1 This Sustainability Appraisal has been published for consultation alongside the Draft Revised Policies document. All representations received from consultees will be considered and where necessary, amendments and/or additions to the assessment will be undertaken. Where appropriate, amendments will be made to the SA appraisal framework that will be used for the subsequent assessment of the next version of the Draft Revised Policies. A revised SA will then be published alongside that document.
- 10.2 Full details of the public consultation can be found on <http://consult.eastsussex.gov.uk>.

Technical Annex

The following Annexes are now contained in the Technical Annex Document:

- Annex A: Review of Policies, Plans and Programmes
- Annex B: Sustainability Indicators
- Annex C: Maps
- Annex D: Appraisal of Sites
- Annex E: Options Appraisal
- Annex F: Compatibility Check of Strategic Objectives
- Annex G: Policy Appraisal
- Annex H: Relevant Historic Policy Appraisals
- Annex I: Combined Policy Appraisal
- Annex J: Summary of assessment of spatial effects of Plan
- Annex K: Effects Arising from Other Plans and Strategies
- Annex L: Glossary of Recommended Mitigation
- Annex M: List of previous sustainability appraisals of the Waste and Minerals Local Plan



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