

Agenda Item 11
Report PC 21/22-12

Report to	Planning Committee
Date	09 September 2021
By	Director of Planning
Title of Report	East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan Review
Purpose of Report	To present the Regulation 19 Consultation documents and update Planning Committee on progress

Recommendation:

The Committee is asked to recommend that the National Park Authority:

- 1) Approve the consultation draft of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan Review, as detailed in Appendix 1 (a) of this report, for Regulation 19 Consultation in autumn/winter 2021 subject to any comments made by the Planning Committee being addressed, and subject to any minor changes that arise prior to the start of the Regulation 19 publication being agreed by the Director of Planning in consultation with East Sussex County Council and Brighton & Hove City Council.**
- 2) Note the main issues arising from Sustainability Appraisal (SA) and the Habitat Regulation Assessment Screening document (HRA) as detailed in Appendices 2 and 3.**
- 3) Delegate authority to the Director of Planning in consultation with the Chair of the Authority, East Sussex County Council and Brighton & Hove City Council, to make any minor changes arising from the consultation and then submit the Waste and Minerals Local Plan Review to the Secretary of State under regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 for examination.**
- 4) Note that if major changes are required to the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan Review that a further public consultation and decision by the Authority may be required.**

Executive Summary

- This report presents the Regulation 19 East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan Review documents to Planning Committee prior to its consideration at NPA in October 2021.
- A Review of aggregate policies in the Waste and Minerals Plan was required by the Inspector of the Waste and Minerals Sites Plan in 2017. A five year full review of the Plan will be due in 2023.

- The Regulation 19 Review does not review strategic waste policy and does not allocate land for minerals development.
- The main policy changes are to update the position on the High Weald AONB, minerals safeguarding, clay extraction, mineral supply and the sustainable use of minerals.
- The Regulation 19 consultation will be held in winter 2021 and if no serious issues are raised, the documents will be submitted to the Planning Inspectorate for an Examination in Public.
- If the Examination in Public is successful, the Plan will form part of the Development Plan for East Sussex and Brighton & Hove and part of the South Downs National Park.

1. Introduction and Summary

- 1.1 The South Downs National Park Authority (SDNPA) worked in partnership with East Sussex County Council, and Brighton & Hove City Council in the preparation of a Waste and Minerals Local Plan (WMLP) for East Sussex. The WMLP is comprised of two documents – the Waste and Minerals Plan (WMP, 2013) and the Waste and Minerals Sites Plan (WMSP, 2017), which contain planning policies used by each authority in the determination of planning applications for waste management activities and minerals extraction and infrastructure in the Plan area.
- 1.2 The Planning Inspector for the WMSP 2017 considered that a Review of the WMP 2013 would be necessary to ensure planning policies are in place for a steady and adequate supply of aggregate minerals. A consultation was undertaken on a Scoping document for the Review along with a ‘Call for Mineral Sites’ in late 2017.
- 1.3 In any event, the National Planning Policy Framework (2021) requires that Local Plans should be reviewed to assess whether they require updating at least once every five years¹.
- 1.4 The purpose of this paper is to provide a summary of the preparation of the draft Local Plan Review and to ask the Committee to agree that the draft Plan along with its Sustainability Appraisal (SA) and Habitats Regulation Assessment are subject to a public consultation in autumn/winter 2021. The draft consultation document forms Appendix 1(a) and the Policies Map Appendix 1(b), the SA forms Appendix 2 and a high level review of the Habitat Regulation Assessment (HRA) forms Appendix 3. Other supporting documents will be published along with the consultation documents on the ESCC website, including the Summary of Responses document.

2. Preparation of the Review of the WMLP

- 2.1 The Authorities have been working through the implications of the responses to the Call for Sites and Scoping document. One of the key considerations relates to aggregate extraction outside of the South Downs National Park on the East Sussex border with Kent.
- 2.2 The existing sharp sand and gravel site in this area (Lydd Quarry) now has limited permitted reserves. The area surrounding the quarry is constrained by both National and European environmental designations, which also cover or are adjacent to all the sand and gravel resource in this part of the County. At the Call for Sites stage the operator submitted a proposed extension to the quarry. Following consideration of advice from Natural England and the availability of alternative materials the Authorities are not proposing to allocate an extension to Lydd Quarry.
- 2.3 The Plan Area has always been a low producer of aggregate due to the geology and environmental constraints as well as internationally protected sites. The Authorities are not proposing to allocate any new extraction sites for aggregates in the Plan area and instead will increasingly rely on sea, rail and road imports from marine and other land won sources and recycled aggregate. This approach emphasises the importance of ensuring adequate infrastructure to support these sources and the importance of discussions as part of the Duty to Cooperate.

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

- 2.4 The Authorities have also been working together with West Sussex County Council on the provision of soft sand, as Planning Committee are aware from previous reports about the West Sussex Soft Sand Review. There is one permitted soft sand site in the East Sussex Plan Area at Novington, in the National Park. The operation of this site is envisaged to continue within the Draft Review WMP.
- 2.5 The draft Local Plan Review proposes the following policy changes:
- Introducing the ‘agent of change’ principle introduced in the revised National Planning Policy Framework;
 - New requirement for net gains in biodiversity to be achieved through planning applications;
 - New requirement to require extraction of mineral resources prior to alternative development proposals commencing within Minerals Safeguarding Areas in some circumstances;
 - Identifying and area of search for clay extraction to provide material for the existing Aldershaw Tileworks following a submission to the ‘call for sites’;
 - Updating the protected landscapes policy to include specific references to the High Weald AONB.
- 2.6 The SA was carried out as part of the preparation of the draft Plan and considered the formulation of the policy options. Broadly speaking the SA concludes that the revisions to policies WMP2 (new policy RV1), WMP7a (new policy RW1) and WMP27 (new policy RD1) will not result in significant changes to the original SA assessments. The exception is WMP27 which now references biodiversity net gain and will likely be more effective at environmental protection. Although the strategy increases the reliance on marine dredged and imported materials, the impacts are considered to be minimal and controlled by legislation and policy. There may be some localised impacts around wharves and railheads in relation to the transportation of materials but these are likely to be small scale.
- 2.7 The preliminary high level HRA concludes that there are no fundamental issues. More specifically, proposals that come forward in the future within any of the proposed Areas of Search may require assessment of impacts on European Sites (including the Ashdown Forest). The HRA concurs with amendments made in relation to the Wealden vs Lewes District Council and South Downs NPA High Court Ruling.
- 2.8 The HRA recommends that revised Policy RMI is amended to include a more specific reference to ‘environmental protection requirements set out in other plan policies’ and this has been taken into account in the draft Plan document.
- 2.9 The Authorities received a number of representations in response to the Regulation 18 Consultation in 2020. A summary of the responses will be published with the Regulation 19 documents. A number of representations related to wider issues than those considered in this review, which is limited to considering the provision of minerals. A full review of the Plan is likely to take place in 2023.

3. Next Steps and Timetable

- 3.1 If Planning Committee agree the recommendation, a report will be presented to the next meeting of the National Park Authority in October 2021. Reports will also be considered by the relevant committees at Brighton & Hove City Council and East Sussex County Council.
- 3.2 If all the partner Authorities agree, the draft Local Plan Review will be published for public consultation in autumn/winter 2021 for a period of at least eight weeks. If the Authorities agree, this document will then be submitted to the Planning Inspectorate for an Examination in Public, likely to take place in 2022.

4. Other Implications

Implication	Yes/No
Will further decisions be required by another committee/full authority	Yes. If Planning Committee agree the recommendation it will require further

	consideration by the NPA. If the Plan is submitted to the Planning Inspectorate, the Authorities will need to consider adoption of the Plan following a successful Examination in Public.
Does the proposal raise any Resource implications?	The cost of preparing the WMLP is shared on a proportional basis by SDNPA, ESCC and BHCC. The costs for all joint waste and minerals planning work in Plan Area are reviewed on a yearly basis.
Has due regard been taken of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010?	Due regard, where relevant, has been taken of the South Downs National Park Authority's equality duty as contained within the Equalities Act 2010. An Equality Impact Report (EIR) is being prepared by ESCC to support the Review Assessment.
Are there any Human Rights implications arising from the proposal?	The WMLP Review has been considered in light of statute and case law and any interference with an individual's human rights is considered to be proportionate to the aims sought to be realised.
Are there any Crime & Disorder implications arising from the proposal?	It is considered that the proposal does not raise any crime and disorder implications.
Are there any Health & Safety implications arising from the proposal?	It is considered that the proposal does not raise any health and safety implications.
Are there any Sustainability implications based on the 5 principles set out in the SDNPA Sustainability Strategy: 1. Living within environmental limits 2. Ensuring a strong, healthy and just society 3. Achieving a sustainable economy 4. Promoting good governance 5. Using sound science responsibly	A Sustainability Appraisal (SA/SEA) was prepared to inform the preparation of the WMLP Draft Review.

5. Risks Associated with the Proposed Decision

Risk	Likelihood	Impact	Mitigation
The Draft Review is not fit for purpose for consultation under Regulation 19	Low	High	The Authorities have undertaken the review of the document in light of relevant legislation and national policy. The Authorities have taken a cautious approach to the preparation of the document to minimise risks.

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SDNPA Consultees	Legal Services; Chief Finance Officer; Monitoring Officer; Director of Planning
External Consultees	None
Background Documents	Appendix 1A: ESCC, SDNP and BHCC WMP Revised Policies 2021 Appendix 1B: Policies Map Appendix 2A: Sustainability Appraisal Main Report Appendix 2B: Sustainability Appraisal Technical Annexes Appendix 3: Habitats Regulation Assessment Screening Report

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

Waste and Minerals Local Plan Revised Policies

Proposed Submission Consultation Document

September 2021

Draft Revised Policies Consultation 2021

Draft Revised Policies Consultation 2021

East Sussex County Council, the South Downs National Park Authority and Brighton & Hove City Council (the Authorities) are undertaking a review of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan. In 2020, the Authorities published and held a public consultation on a proposed Draft Revised Policies document. This is a Local Plan document that seeks to alter and update parts of the existing minerals and waste local plan documents. Since then, the Authorities have considered the response to that consultation and drafted a second version of the Draft Revised Policies (this document). It has now been published for a second public consultation known as a Pre-Submission or Regulation 19 Consultation.

What is a Pre-submission / Regulation 19 Consultation?

Before a Local Plan can be adopted as policy, it must be subject to a Public Examination by an independent Inspector. The Inspector examines whether the plan has met certain legal requirements and is 'Sound'. For a plan to be sound, it must be positively prepared, justified, effective and consistent with national policy. The Pre-submission / Regulation 19 Consultation seeks your views on whether the draft Plan has met the required legal requirements, whether it is sound or not, and if it is not sound, how it should be altered to make it sound.

How do I respond?

Responses may be made by email or post using the addresses below, or using the online form. Please include your name and your address in any response. For more information on how we will use your data, please see our [privacy notice](#).

Your response should clearly state:

1. if your comment relates to the legal compliance and / or soundness of the plan;
2. the issue(s) that you wish to raise;
3. and in the case of comments relating to soundness, how the plan should be altered to make it sound.

Comments may be submitted:

Online - <http://consult.eastsussex.gov.uk>

Email - wasteandmineralsdf@eastsussex.gov.uk

Post - RPD Consultation 2021, Planning Policy and Development Management - Communities, Economy and Transport, East Sussex County Council, County Hall, St Anne's Crescent, Lewes, BN7 1UE.

The deadline for comments is **TBC.**

Draft Revised Policies Consultation 2021

Can I respond anonymously?

Responses without a name or address, or indicating that they do not wish their name or address to be published will be treated as anonymous responses, these will be published as such and may not carry the same weight as other responses. Further information can be found in the [privacy notice](#).

What happens next?

All responses will be collated and these, along with the Plan and its supporting evidence, will then be re-published and submitted to the Government to start a Public Examination into the Plan. An independent inspector will then consider the responses to this consultation and examine the legal compliance and soundness of the Plan. If the Inspector finds the Plan to be sound and legally compliant the Authorities will then seek to adopt it as policy.

Questions?

If you have any questions please do contact us using the email above or by phone on 01273 481846 (East Sussex) or email planningpolicy@brighton-hove.gov.uk (Brighton & Hove).

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Introduction 1

1 Introduction

1.1 East Sussex County Council, Brighton & Hove City Council and the South Downs National Park Authority (the Authorities) have responsibility for planning the future management of waste and production of minerals. To guide those decisions the Authorities are required to prepare Minerals and Waste Local Plans which contain policies that guide where minerals and waste developments should go. These policies are then used to make decisions on planning applications for waste management and minerals activities.

1.2 The Waste and Minerals Local Plan (WMLP) is currently comprised of the:

- Waste and Minerals Plan 2013 (WMP), and
- Waste and Minerals Sites Plan 2017 (WMSP).

1.3 The purpose of the review principally focuses on minerals provision, as well as updating and clarifying certain other policies, it is not a complete review of the WMLP. This document therefore sets out proposed revisions to specific policies within the WMLP. The Plan Area for this and the other WMLP documents is the administrative areas of East Sussex and Brighton & Hove including part of the South Downs National Park and the Plan period for the policies within this document is 2019-2034 inclusive (15 years). This period differs from the period covered by the existing WMLP. However, at the completion of this review, a full plan review of the entire WMLP will be undertaken which will provide an opportunity to align the Plan period. The revised policies include two key changes:

- East Sussex and Brighton & Hove to become more reliant on aggregates from the marine sources and other sources outside of the Plan Area.
- Providing increased protection for minerals and minerals related infrastructure against inappropriate development being located nearby,

1.4 A number of updates to clarify and consolidate existing policies are also proposed, along with an additional policy for the provision of an additional area of clay extraction at Aldershaw Farm. No other alterations to the existing strategy are being proposed at this time.

1.5 This document, if adopted, will join the other WMLP documents in forming part of the Development Plan for the administrative areas set out in Paragraph 1.3. This means that relevant policies within the WMLP documents apply to all development within this area, not just proposals for waste and minerals development, and that other local authorities within this area will need to consider relevant WMLP policies when determining planning applications. Similarly, other relevant Development Plan documents besides the WMLP will need to be considered when determining applications for waste and minerals development.

1 Introduction

1.6 Once this review has been completed, a composite version of the Waste and Minerals Local Plan comprising of the Waste and Minerals Plan and the Waste and Minerals Sites Plan, incorporating the changes proposed in this document will be published.

How to read this document

1.7 As the Authorities are proposing to make amendments to specific parts of the WMP and WMSP this document is written in the style of an amendment document. On the following pages there is a table which lists all the policies in the WMLP and their status.

1.8 Over the remainder of the document, to help show and explain these the amendments, the following special notations are used:

Explanation

Commentary text explaining the proposed changes can be found in these grey bordered boxes. This does not form part of the revised policies and will not be included in the final Plan.

Text in bold explains what alterations are being proposed, for example if sections are proposed to be deleted or added.

Text in italics is proposed text on which comments are being sought.

The Authorities intend to publish a document that consolidates all three documents in due course.

Summary of Policy Review 2

2 Summary of Policy Review

2.1 Below is a complete list of adopted and draft policies of the Waste and Minerals Local Plan from the WMP, WMSP and this document, the Revised Policies Document (RPD). Policies proposed for deletion are ~~struck out~~ with a red background, whilst proposed policies are shown underlined with a green background. All relevant policies should be applied in the determination of planning applications.

Policy Number	Policy Title	Document	Page	Status
Overarching Strategy				
WMP1	Presumption in Favour of Sustainable Development	WMP	33	Adopted
WMP2	Minerals and Waste Development affecting the South Downs National Park	WMP	36	Adopted
<u>RV1</u>	<u>Minerals and Waste Development affecting the South Downs National Park and High Weald Area of Outstanding Natural Beauty</u>	<u>RPD</u>	<u>17</u>	<u>Draft</u>
WMP3a	Promoting Waste Prevention, Re-use and Waste Awareness	WMP	40	Adopted
WMP3b	Turning Waste into a Resource	WMP	42	Adopted
WMP3c	Production of Energy from Waste (EfW)	WMP	45	Adopted
WMP3d	Minimising and Managing Waste During Construction, Demolition and Excavation	WMP	46	Adopted
WMP3e	Waste Management In New Development in the Plan Area	WMP	48	Adopted
WMP4	Sustainable Provision and Use of Minerals	WMP	50	Adopted
Providing for Waste				
WMP5	Provision of Built Waste Facilities	WMP	53	Adopted
WMP7a	Sustainable Locations for Waste Development (Excluding Land Disposal)	WMP	61	Adopted
WMP7b	More Detailed Criteria for Waste Development	WMP	62	Adopted
<u>RW1</u>	<u>Sustainable Locations for Waste Development (Excluding Land Disposal)</u>	<u>RPD</u>	<u>21</u>	<u>Draft</u>
SP1	Waste Site Allocations	WMSP	14	Adopted
SP2	Areas of Opportunity on Previously Developed Land	WMSP	15	Adopted
SP3	Areas of Search	WMSP	16	Adopted
SP4	Physical Extension of Existing Waste Site	WMSP	17	Adopted
SP5	Existing Industrial Estates	WMSP	19	Adopted
WMP8a	Land Disposal of Non-Inert Waste	WMP	67	Adopted
WMP8b	Deposit of Inert Waste on Land for Beneficial Uses	WMP	69	Adopted
WMP8c	Management of Landfill Gas	WMP	70	Adopted
WMP9a	Hazardous Waste	WMP	72	Adopted
WMP9b	Low Level Radioactive Waste	WMP	75	Adopted
WMP10	Management of Waste Water and Sewage Sludge	WMP	77	Adopted
WMP6	Safeguarding Waste Sites	WMP	58	Adopted

2 Summary of Policy Review

Policy Number	Policy Title	Document	Page	Status
SP6	Safeguarding Waste Sites	WMSP	22	Adopted
SP7	Waste Consultation Areas	WMSP	23	Adopted
Providing for Minerals				
WMP11	Provision of Aggregates	WMP	81	Adopted
RM0	<u>Sustainable Use of Aggregates</u>	RPD	24	Draft
RM1	<u>Provision of Aggregates</u>	RPD	31	Draft
WMP12	Provision of Gypsum	WMP	83	Adopted
WMP13	Provision of Clay	WMP	85	Adopted
RM2	<u>Provision for an additional extraction area at Aldershaw Farm</u>	RPD	34	Draft
WMP14	Safeguarding Mineral Resources	WMP	88	Adopted
SP8	Mineral Safeguarding Areas for land-won minerals resources within the Plan Area	WMSP	25	Adopted
RM3	<u>Safeguarding Mineral Resources</u>	RPD	38	Draft
RM4	<u>Prior Extraction of Minerals</u>	RPD	40	Draft
WMP15	Safeguarding Wharves and Railheads	WMP	90	Adopted
SP9	Safeguarding wharves and railheads within the Plan Area	WMSP	27	Adopted
RM5	<u>Safeguarding Minerals Infrastructure</u>	RPD	43	Draft
SP10	Safeguarding facilities for concrete batching, coated materials...	WMSP	28	Adopted
RM6	<u>Safeguarding facilities for concrete batching (etc)</u>	RPD	46	Draft
SP11	Minerals Consultation Areas	WMSP	29	Adopted
RM7	<u>Minerals Consultation Areas</u>	RPD	47	Draft
WMP16	Exploration for Oil and Gas	WMP	92	Adopted
Overarching Policies				
WMP17	Restoration	WMP	94	Adopted
WMP18	Transport - Road, Rail and Water	WMP	97	Adopted
WMP19	Co-location of Complementary Facilities	WMP	98	Adopted
WMP20	Community Involvement and Benefits	WMP	100	Adopted
WMP21	Opportunities for Sustainable Waste Management and Minerals Production in Other Development	WMP	102	Adopted
WMP22	Expansion and Alterations Within Existing Waste Facilities	WMP	103	Adopted
Development Management policies				
WMP23a	Design Principles for Built Waste Facilities	WMP	106	Adopted
WMP23b	Operation of Sites	WMP	107	Adopted
WMP24a	Climate Change	WMP	109	Adopted
WMP24b	Resource and Energy Use	WMP	109	Adopted
WMP25	General Amenity	WMP	110	Adopted
WMP26	Traffic Impacts	WMP	112	Adopted

Summary of Policy Review 2

Policy Number	Policy Title	Document	Page	Status
WMP27	Environment and Environmental Enhancement	WMP	113	Adopted
RD1	Environment and Environmental Enhancement	RPD	51	Draft
WMP28a	Flood risk	WMP	117	Adopted
WMP28b	Water Resources and Water Quality	WMP	118	Adopted
Diagrams				
	Waste Key Diagram	WMP	156	
	Minerals Key Diagram	WMP	157	

Notes:

1. All policies within the WMLP are considered to be strategic policies. See paragraphs 20-23 of the NPPF for further information.
2. Some policies appear out of document order above so that they appear correctly grouped in the table.

3 Context

3 Context

Explanation

This section does not contain any Policy changes, and instead serves as an update to the factual information provided in the WMP, and gives an overview of the minerals produced and imported into the Plan Area which are subject to the review.

Background to the Review

3.1 *The Authorities monitor the success of the WMLP and its policies through their Annual Monitoring Reports (AMRs) and Local Aggregate Assessments (LAAs). Through this process, three areas of the Plan have been identified which the Authorities consider should be reviewed. These are:*

- *The provision of sand and gravel (aggregates);*
- *the safeguarding of minerals resources and infrastructure; and*
- *improving the effectiveness of specific policies.*

3.2 *The Authorities have also checked current WMLP policies against the latest iteration of the NPPF, proposing changes where necessary, and have factored in updated evidence, changes in relevant policy and emerging policy. The Authorities have also monitored the effectiveness of the policies in the WMLP in the determination of planning applications, and this has in turn formed part of the consideration when identifying the topics of the review.*

3.3 *The Authorities remain committed to the concept of net self-sufficiency for the management of non-hazardous waste, meaning that they plan for the management of an amount of waste which is equivalent to the amount arising in the Plan Area. The overall approach to waste policies in the WMLP is not considered to require review at this time.*

3.4 *The Authorities are committed to ensuring that the WMLP minimises and mitigates against contributory causes of climate change, as well as adapting to the changes to our climate that are likely to occur. This is especially pertinent given the Climate Emergency declared by each of the three Authorities, and emerging legislation and documents including the Government's 25 Year Environment Plan. The existing WMLP has policies concerning climate change, particularly WMP24a and WMP24b, which are considered to be still relevant and in accordance with higher level planning policy (i.e. the NPPF). The scope of the current review is largely limited to minerals provision, however the Authorities acknowledge that a review of the whole Plan in terms of climate change implications will be necessary in the future. For this reason the Authorities will commit to a future*

Context 3

full plan review in order to reassess the entire plan in the context of climate change and key legislative changes, such as the Environment Bill (once enacted) and secondary legislation, policy changes and further guidance.

Policy Context

3.5 Local Plans, including minerals and waste plans, must be prepared in the context of national policy and other relevant documents. Since the adoption of the WMP in February 2013 and the WMSP in 2017, the policy context for planning generally as well as Minerals and Waste planning has evolved, with the publication of new key documents informing the content of this review. Policies and documents which have influenced the approach taken in this Plan revision are detailed below⁽¹⁾. This is not an exhaustive list of documents, and does not include documents published before the publication of the WMP; a more complete list of documents will be available in the Sustainability Appraisal that will be published as part of this review.

National Policies and Strategies

3.6 National planning policy is set out in the '[National Planning Policy Framework](#)' (NPPF) (last updated July 2021). This document provides the framework for sustainable development in England, and contains a chapter on facilitating the sustainable use of minerals. Waste policies are set out in the [National Planning Policy for Waste](#) (October 2014). [Planning Practice Guidance](#) provides further information on how national policy should be implemented, including notes on Minerals, Waste and Plan-Making, and is updated periodically.

3.7 The following documents have also been taken into account when preparing the Review:

- The [25 Year Environment Plan](#) sets out the government's overall approach to protecting and improving the natural environment. The [Environment Bill](#), which has not yet been enacted, makes provision about targets, plans and policies for improving the natural environment.
- The [Ten Point Plan for a Green Industrial Revolution](#) sets out the government's approach to economic growth, supporting green jobs and accelerating the path to net zero.
- The [Energy White Paper](#) sets out how the UK will decarbonise its energy system and reach net zero emissions by 2050.
- The [Resources and Waste Strategy for England](#) sets out policy for the preservation of material resources in England by minimising waste, promoting resource efficiency and moving towards a circular economy where products and materials are recovered and regenerated where possible. This document is of particular relevance to the production of secondary and recycled aggregates.

¹ A list of references for this section is available in the Appendix.

3 Context

- [The Waste Management Plan for England](#) provides an analysis of the current waste management situation in England and aims to bring current waste management policies together under one national plan. The most recent iteration of the Plan, published in January 2021, includes changes relating to the promotion of a circular economy.
- [Practice Guidance on the Production and Use of Local Aggregate Assessments](#) is produced by the Planning Officers Society and the Minerals Products Association. The South East England Aggregates Working Party (SEEAWP), to which the Authorities are party, has also produced guidance on the production of LAAs. The Authorities have considered the guidance when working on this Plan Review and in preparing the LAA.
- The Planning Officers Society and the Minerals Products Association have produced [Minerals Safeguarding Practice Guidance](#) which has instructed the safeguarding of minerals resource and infrastructure in this Plan Review.

Local Plans and Strategies

3.8 The District and Borough Councils in East Sussex, as well as the South Downs National Park Authority and Brighton & Hove City Council have published, or are preparing, Local Plans which set out planning policies governing development in their areas. There are also a number of Neighbourhood Plans in place or in preparation in the Plan Area, which contain planning policies for smaller-scale areas, although these cannot plan for strategic matters such as waste and minerals.

3.9 The following local documents have been taken into account when preparing the Plan Review:

- The Authorities are required to prepare a [Local Aggregate Assessment \(LAA\)](#) annually which reports on all aggregate supply options and forecasts demand in the Plan Area.
- The South Downs National Park Authority (SDNPA) have produced a [Sustainable Construction Supplementary Planning Document](#) which expands upon the guidance provided in The South Downs Local Plan and sets out what the expectations are for different forms of development when applying the Local Plan policies relating to construction.
- Lewes District Council have produced a [Circular Economy Technical Advice Note](#) which encourages a circular economy approach involving the recovery and reuse of construction materials, for the development sectors within Lewes District.
- The Marine Management Organisation (MMO) is responsible for managing the seas around England through marine planning, which includes providing licenses for marine dredging that are necessary for the marine extraction of minerals. The MMO [South Marine Plan](#), adopted July 2018, covers the areas of sea which border the Plan Area.
- West Sussex County Council and the SDNPA adopted their [Joint Minerals Local Plan](#) in 2018. A [Soft Sand Review](#) of the Plan was subsequently undertaken, which identified changes to the Plan, and was formally adopted in March 2021. The supply of soft sand is an important cross-boundary issue between Minerals Planning Authorities in the south of England.

Context 3

- The [Joint Area Action Plan](#), which sets out the future vision and development policies for the Shoreham Harbour area, has been adopted by Brighton & Hove City Council, Adur District Council and West Sussex County Council. Minerals wharves at Shoreham Harbour within West Sussex are known to import significant amounts of marine dredged aggregate and crushed rock into the WMLP Area.
- The Shoreham Port Authority adopted their most recent [Port Masterplan](#) in 2021, setting out the Port's plans for future growth.
- The [Environment Strategy](#) for East Sussex was published in 2020, and sets out a long term goal for East Sussex to remain within its science-based carbon budget. The document focuses on five key themes: climate change, natural capital, air quality, water, and resource efficiency. East Sussex County Council have also agreed a [Climate Emergency Action Plan](#) which covers the Council's corporate carbon emissions, sets out the scale of the carbon footprint, describes the carbon budget that the Council will aim to keep within, and proposes an initial 2 year delivery plan for 2020-22. Brighton & Hove City Council adopted the [Carbon Neutral 2030 Programme](#) in 2021, setting out the direction for action on climate change for the Council, its partners and residents, in response to the climate and biodiversity emergency. The SDNPA also adopted a [Climate Change Adaptation Plan](#) in 2015 which sets out how the authority intends to meet the challenges and opportunities of climate change.
- The SDNPA [Partnership Management Plan](#) sets out a vision for what the National Park should look like by 2050. The SDNPA [People and Nature Network](#) sets out aims to create a connected network of green infrastructure.
- The [High Weald AONB Management Plan](#) sets out long term objectives for conserving the High Weald Area of Outstanding Natural Beauty.
- Two Local Enterprise Partnerships (LEPs) cover the Plan Area. These are cross-boundary economic partnerships between Local Authorities and businesses. The [Coast to Capital LEP](#) includes Brighton & Hove, whilst East Sussex is part of the [South East LEP](#).
- The [Newhaven Enterprise Zone](#) is a designation which covers a number of sites in Newhaven which are identified and/or safeguarded in the WMP, including North Quay which contains a number of safeguarded mineral wharves.
- [Transport for the South East](#) is a cross-boundary partnership which aims to improve the transport network and benefit the economy throughout the South East of England.
- The [Local Transport Plan for East Sussex](#), which includes the areas of the National Park, covers the period 2011-2026 and sets out the future direction for transport infrastructure and services in the County. The [Local Transport Plan for Brighton & Hove](#), which also includes areas of National Park, contains a long-term strategy for delivering transport improvements until 2030.

Industry Best-practice Guidance

3.10 The following documents provide guidance on construction practices, and have been useful in developing policies for the Plan review:

3 Context

- The Royal Institute of British Architects (RIBA) have developed a [2030 Climate Challenge](#) which aims to ensure architects meet net zero carbon standards for new and retrofitted buildings by 2030.
- The Royal Institute of Chartered Surveyors (RICS) have produced the [Whole Life Carbon Assessment for the Built Environment](#) which is a professional statement that aims to standardise carbon assessments in development, and which all RICS members must act in accordance with.
- The UK Green Building Council (UKGBC) have produced a [framework definition on net zero carbon buildings](#) in order to provide the industry with clarity on how to achieve net zero carbon in construction. The UKGBC have also set out [Circular Economy Guidance for Construction Clients](#), which provides practical guidance for the construction industry.
- The Green Construction Board have set out the [Buildings Mission 2030](#) report, which demonstrates how achieving the 2030 target to halve all new building energy use over 2018 standards is achievable.

Cross-boundary and Partnership Working and the Duty to Cooperate

3.11 The Duty to Cooperate (DtC) is a statutory requirement set out in Section 110 of the Localism Act 2011 that requires councils and other prescribed bodies to work together on strategic matters when preparing Plan documents. The Authorities have worked in partnership with others in preparing the WMLP review. Details of the steps taken by the Authorities in relation to the DtC can be found in the Plan [Monitoring Reports](#).

3.12 The National Planning Policy Framework also requires authorities to produce and maintain Statements of Common Ground (SoCG) during the plan-making process, which are written records of key cross-boundary matters and the progress made towards cooperation between authorities. A number of draft SoCGs have been prepared alongside the WMLP Review, and the Authorities have also signed up to, and actively engage with, a number of other existing and emerging SoCGs relevant to the Plan Area.

Characteristics of the Plan Area

3.13 Large parts of the Plan Area are subject to protection. Two thirds is covered by the South Downs National Park and the High Weald Area of Outstanding Natural Beauty. Several other tracts of land are designated as being of international and national environmental importance. The area to the east of the Plan Area, in the vicinity of Lydd Quarry, is designated for its ecological and geological interest at a national and international level, including the Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA), Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI). The Pevensey Levels Ramsar site is designated for its wetland habitat. The Plan Area contains a number of other SPAs, SACs, SSSIs and ancient woodlands. There are also

Context 3

a number of locally designated sites of importance for their wildlife and/or geology (Local Wildlife Sites and Local Geological Sites). These areas are protected in order to maintain the rich and varied landscape character and biodiversity within the Plan Area.

3.14 *The demography of the Plan Area affects the need for minerals as well as the generation of waste. The Plan area had an estimated total population of approximately 840,459 in 2017, of which about two thirds live in East Sussex and the remainder in Brighton & Hove. Approximately 4% live within the South Downs National Park. There is significant residential development expected within the Plan Area, which has been planned for up to 2034. The population in East Sussex is predicted to increase by approximately 10.86% between 2016 and 2031. The average household size is also expected to decrease from 2.22 in 2014 to 2.06 in 2039. These factors could lead to a greater demand for minerals in terms of impact on development and infrastructure and an increase in waste arisings, though a reduction in the average size of household may cause the waste generated per household to decrease.*

Minerals and Waste Context

Minerals in the Plan Area

3.15 *Minerals are natural substances which include metals, rocks, and hydrocarbons (oil and gas) that are extracted from the earth (including the seabed) by mining, quarrying, pumping and dredging. They are used in a wide range of applications related to construction, manufacturing, agriculture and energy supply.*

3.16 *The geology of the Plan Area dictates where minerals occur. The South Downs National Park, in the south west of the Plan Area, is formed of chalk hills and vales dissected by major valleys cut by the rivers Ouse and Cuckmere. The High Weald, which covers much of the northern, central and eastern parts of the Plan area, is a faulted structure comprising clays and sandstones. The Low Weald is a gently undulating clay vale which separates the High Weald from the chalk Downs to the south. The Coastal Marshes are located between Eastbourne and Bexhill, and in the Rye Bay/Camber area either side of the Rother estuary. These areas comprise large sheets of alluvium, extending inland over the Pevensey Levels and Romney Marsh.*

3.17 *Aggregates are minerals such as sand, gravel, and crushed rock, which are used in the development and improvement of infrastructure and buildings. Two types of sand and gravel are found in the Plan Area: sharp sand and gravel and soft sand, which have different uses. Historically there have been low levels of extraction of 'land-won' sand and gravel in East Sussex, and imports of aggregates extracted from the seabed (known as marine dredged aggregates) and crushed rock have been important in meeting local construction needs.*

3 Context

3.18 *Secondary aggregates are materials that are produced as a by-product of other industrial processes, and recycled aggregates are materials that have previously been used in construction. A steady supply of both, particularly recycled, is produced across the Plan area.*

3.19 *Clay is extracted in East Sussex for brick and tile manufacture. There are currently four active sites, including Aldershaw Farm in Sedlescombe near Battle.*

3.20 *Gypsum is an important raw material for the construction industry, and is used in plaster and plasterboard, cement and other industrial processes. The resource near Robertsbridge in East Sussex is the largest deposit in the UK. Gypsum can be substituted with desulphogypsum (DSG), a secondary material which is a by-product from coal fired power stations.*

3.21 *There is currently only one existing licence for exploration for oil and gas within East Sussex covering 20 square kilometres around North Chailey. There are no current planning applications or planning permissions for any oil and gas exploration and development in East Sussex.*

Waste in the Plan Area

3.22 *Waste is generally defined as materials and goods we discard because we no longer want or need them. Many different types of solid and liquid waste are produced in the Plan Area and the Plan applies to them all. Around 1.75 million tonnes of solid waste are handled in the Plan Area each year. The main types are:*

- **Local Authority Collected Waste (LACW)** which comprises about 21% of all wastes in the Plan Area;
- **Commercial and Industrial Waste (C&I)** which makes up about 27%, and;
- **Construction, Demolition and Excavation Waste (CDEW)** which accounts for about 51%.

3.23 *Other waste sources include hazardous waste, which makes up approximately 1% of the total waste stream and often requires specialist treatment facilities with tight environmental controls, low level radioactive waste, liquid waste, wastes arising from the agricultural sector, and waste water, which comprises the water and solids that flow to a waste water treatment works. There are 74 waste water treatment facilities within the Plan Area treating 90 million cubic metres of waste water each year.*

3.24 *Some waste is exported to other areas for management including non-inert waste to landfill. Approximately 47,000 tons of LACW and C&I waste was exported for land disposal at facilities outside of the Plan Area in 2018. This is an improvement on 2010/11 when approximately 147,000 tones of LACW was sent for land disposal outside the Plan Area.*

Context 3

Transport of Minerals and Waste

3.25 Road infrastructure in the Plan Area is currently constrained. There are no motorways, and the trunk road network is predominantly single carriageway. Although waste and minerals traffic movements account for only a small percentage of the total, the current limitations of the road network is a consideration in planning for new development. To accommodate additional transport demands on the strategic and major road networks, there are a number of improvements currently being implemented to the A27 east of Lewes, whilst there are aspirations for further improvements to be delivered on the A27 and A21 corridors. In addition, there are proposed improvements to the A22 in the Hailsham and Stone Cross area.

3.26 Rail Freight movement of minerals and waste consists of gypsum and DSG imported into the mine at Robertsbridge; crushed rock, sand and gravel and recycled aggregates imported into Newhaven; and Incinerator Bottom Ash (IBA) produced by the Newhaven Energy Recovery Facility exported from Newhaven to Brentford to be processed into recycled aggregate. A new railhead facility in Newhaven exports aggregates into the wider South East market.

3.27 Marine-borne aggregates are imported through the ports of Newhaven, Rye and Shoreham. Aggregate importation figures are available in the Authorities' [Local Aggregate Assessment \(LAA\)](#)

4 Overarching Strategy

4 Overarching Strategy

Explanation

The overarching strategy of the WMLP is set out in the WMP. It sets out the vision and strategic objectives ⁽²⁾ for the Plan Area, and four main overarching policies, WMP1, WMP2, WMP3a-e and WMP4. Together these policies aim to promote the movement of waste up the [waste hierarchy](#) so that waste is prevented, then reused, recycled, recovered and as a last resort disposed of safely, by enabling the provision of the required waste management facilities. The policies also seek to make provision for a steady supply of minerals by promoting the use of secondary and recycled aggregates, the use of sustainable transport methods, whilst using viable primary mineral resources as a least preferred option. Both of these aims are in the context of objectives seeking to mitigate and adapt to climate change whilst protecting and enhancing the environment, communities and human health.

In this section the Authorities propose:

- to remove the section titled Local Strategy Statement, which is now addressed through Statements of Common Ground with the relevant duty to co-operate parties.
- replace Policy WMP2 Minerals and Waste Development Affecting the South Downs National Park with Policy RV1 Minerals and Waste Development Affecting the South Downs National Park and High Weald Area of Outstanding Natural Beauty.

The overarching strategy of the WMLP itself remains unchanged.

It is proposed that the part of this section titled Local Strategy Statement - Approach to Key 'Larger than Local' Matters in the WMP (pages 25-32) is removed from the WMP because this topic is now addressed through the Statement(s) of Common Ground that accompanies this Plan.

2 See WMP pages 22-24.

Overarching Strategy 4

Minerals and Waste Development affecting the South Downs National Park and High Weald Area of Outstanding Natural Beauty (RV1)

Explanation

As part of the review of Policy WMP27, which is addressed later in this document, it has been identified that further clarity could be provided in relation to minerals and waste development affecting the High Weald Area of Outstanding Natural Beauty (AONB), particularly in respect of its purposes. Policy WMP2 currently contains similar requirements in relation to the South Downs National Park, but does not refer to the High Weald AONB. The Authorities propose to revise WMP2 to align more closely with the NPPF (2021).

The Authorities also propose the removal of criteria c) which addresses extensions to existing soft sand quarries or new quarry proposals in the National Park. This is now addressed within the following section Provision of Aggregates (RM1) and Duty to Cooperate work, see page # for further information.

Neither of these changes are intended to alter the overall strategy of the Waste and Minerals Local Plan.

Is it proposed that this section will replace Minerals and Waste Development affecting the South Downs National Park (WMP2) on pages 34-36 of the WMP.

Purpose of Policy RV1

To ensure development is sustainable and appropriate to the purposes and duty of the South Downs National Park Authority and the purposes and objectives of the High Weald Area of the Outstanding Natural Beauty Management Plan.

4.1 The South Downs National Park

4.2 The South Downs National Park was established in 2010 and the South Downs National Park Authority took up its statutory responsibilities in April 2011. The South Downs National Park covers an area of 1600km² and stretches from Eastbourne in the East to Winchester in the West. Although over 85% of the area is farmed, it has a population of over 117, 000 people and includes the towns of Lewes, Midhurst and Petersfield. The South Downs Local Plan 2019 sets out the planning policy

4 Overarching Strategy

context for the whole SDNP, replacing previous joint plans with each of the district and boroughs. The SDNPA plans jointly for minerals and waste with East Sussex County Council, Brighton and Hove City Council, West Sussex County Council and the Hampshire Authorities.

4.3 *National Parks and Areas of Outstanding Natural Beauty have the highest status of protection in relation to landscape and scenic beauty and this will be given great weight in decisions.*

4.4 *The South Downs National Park has the following statutory purposes:*

- *To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and*
- *To promote opportunities for the understanding and enjoyment of the special qualities of the Park by the public.*

4.5 *Section 62 of the Environment Act 1995 requires all relevant bodies including statutory undertakers and statutory bodies to have regard to the purposes. If there is a conflict between the two purposes, the first takes precedence. In pursuing these purposes the SDNPA also has a duty to seek to foster the economic and social well-being of local communities within the National Park.*

The High Weald Area of Outstanding Natural Beauty

4.6 *The High Weald AONB was designated in 1983 and covers land within 4 counties and 11 district or borough councils. It is one of 46 AONBs in England, Wales and Northern Island. It covers an area of 1,461km² and 127,000 people live within its boundary. A third edition of the management plan for the High Weald AONB was published in 2019, covering the period to 2024.*

4.7 *The primary purpose of AONB designation is to conserve and enhance natural beauty, but the architects of the 1949 Act recognised other underlying principles which were important aspects of the designation's success. These included the need to maintain a 'thriving community life' with particular emphasis on farming and forestry, and the need to promote understanding and enjoyment of the area's special qualities. These subsidiary purposes - in effect, qualifications of the primary purpose - are those defined in the Countryside Commission statement 1991, restated in 2006 (the basis for the wording of the subsidiary purposes can be found in the Countryside Act 1968, section 37):*

- *In pursuing the primary purpose of designation, account should be taken of the needs of agriculture, forestry and other rural industries, and of the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development*
- *The formal legal responsibility for both development control and for management of the High Weald AONB (including the duty to prepare an AONB Management Plan) lies with the local authorities in whose area(s) the AONB exists. In addition, local authorities and all public bodies have a statutory duty under CROW Act 2000, Section 85, to '...have regard to the purpose of*

Overarching Strategy 4

conserving and enhancing natural beauty...'. To 'conserve and enhance' is a single duty, therefore exercising the duty requires that both elements be addressed.

Minerals and Waste Development in the South Downs National Park and the High Weald Area of Outstanding Natural Beauty

4.8 *National Parks and Areas of Outstanding Natural Beauty (AONB) have the highest status of protection in terms of landscape and scenic beauty. Great weight, therefore, must be given towards the protection of the natural beauty of the landscape, together with conservation of wildlife and cultural heritage, when making planning decisions.*

4.9 *National planning policy for minerals and waste development in the countryside and rural areas relates to "major development" within nationally designated areas including National Parks and AONB. Within the context of national policy, the winning and working of minerals and waste development generally constitutes major development whereby due to the nature, character and scale of some proposals, there is the potential to adversely impact upon recreational opportunities and the natural beauty of protected landscapes.*

4.10 *Major minerals and waste development (including quarry restoration) can have significant adverse impacts upon such areas of natural beauty together with the recreational opportunities that they provide. In line with national policy, major minerals and waste development must not be permitted within National Parks or AONB except in exceptional circumstances. Applications must also be demonstrated to be in the public interest. Development will only be in the public interest if consideration of the proposal details gives sufficient reason/s to override the potential damage to the natural beauty, cultural heritage, wildlife or quiet enjoyment of the National Park and or AONB. Minerals and waste development can also have positive effects on the environment through restoration and aftercare (Policy WMP17 addresses restoration requirements in detail).*

4.11 *Other minerals and waste development which is ancillary to a main minerals and waste operation (e.g. weighbridge, offices, haul road and minor amendments) would not normally be considered as major development. It would be expected however that such proposals have regard for and consideration of National Park and AONB purposes, and ensure that great weight is given to the conservation of the landscape and natural beauty, conservation of wildlife, cultural heritage and recreational opportunities.*

4.12 *Quarries and quarrying operations have the potential to impact heavily upon the landscape and surrounding environment, therefore the setting of any proposed development within the context of the National Park or AONB is also an important consideration. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.*

4 Overarching Strategy

4.13 *Minerals and waste development not considered to be major should be carefully assessed. Weight should be given towards conservation of the landscape's natural beauty, the conservation of wildlife and cultural heritage and the need to avoid adverse impact upon recreational opportunities within these areas.*

Policy RV1

Minerals and waste development affecting the South Downs National Park and High Weald Area of Outstanding Natural Beauty

- a) Minerals and waste development in the South Downs National Park and the High Weald AONB will have regard to the relevant Management Plan.*
- b) Major minerals and waste development in the South Downs National Park or High Weald AONB will be refused other than in exceptional circumstances, and where it can be demonstrated to be in the public interest⁽³⁾. In this respect, consideration will be given relevant information, including:

 - i. the need for the development, including in terms of any national considerations; and*
 - ii. the impact of permitting or refusing the development upon the local economy; and*
 - iii. the cost of and scope for developing outside the designated area or meeting the need in another way; and*
 - iv. any detrimental effect on the environment, landscape and/or recreational opportunities and the extent to which it could be moderated.**
- c) Small-scale waste management facilities for local needs are not precluded from the National Park or AONB where they meet the requirements of Policy RD1.*
- d) Proposals for the backfilling of redundant quarries within the National Park or AONB need to conform with (b) above and additionally demonstrate net long term benefits to the National Park or AONB and that they meet Policy WMP 8b criteria (a) to (e).*

³ *In the case of minerals and waste proposals, all applications are defined by the Town and Country Planning (Development Management Procedure) Order 2010 as 'major'. However, for the purpose of this policy, the potential for significant impacts on the National Park and AONB will be dependent on the individual characteristics of each case. When assessing what constitutes "major development" within a protected landscape the guidance set out in Footnote 60 to the NPPF will be applied*

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5 Providing for Waste

5.1 The Providing for Waste section in the WMLP sets out policies regarding the amount of waste management capacity that is planned for locations suitable for waste management development, and safeguarding arrangements for waste management facilities.

Explanation

Monitoring by the Authorities indicates that the waste strategy does not require altering at this time. There was ambiguity in Policy WMP7a "Sustainable Locations for Waste Management Development" and Policy WMP7b "More Detailed Criteria" that required clarification. Policy RW1 below combines and clarifies these policies.

All other policies within this section apart from WMP7a and WMP7b remain unchanged.

Sustainable Locations for Waste Development (RW1)

Explanation

Policy RW1 proposes to remove ambiguity and consolidate WMP7a and WMP 7b clarifying the policies intent. It retains the existing direction of policies WMP 7a and WMP 7b and all alterations to the policy are intended to only be technical in nature. Policy RW1 proposes the following alterations:

1. The preference expressed in Policy WMP7b for development on general industrial land including general industrial estates, employment land (B2/B8 uses), previously-developed land, and land already in waste management uses, has been replaced by a requirement to demonstrate that the development is located within one of these areas or, that it has been adequately demonstrated and explained why this is not possible. The exception in relation to minerals sites has been retained.
2. Text in Policy WMP 7a concerning small scale facilities in the South Downs National Park and the High Weald AONB has been removed; this was already addressed through the criteria relating to small scale facilities which are not restricted by the Area of Focus and addressed by Policy RV1 which places additional requirements on development within the South Downs National Park.
3. The 'Purpose of Policy' box and supporting text have also been updated to reflect the updated text.

5 Providing for Waste

The Authorities have focused on making the above alterations to the policy and, at this time, consider that the broad strategy does not require alteration. Consequently, no alterations to other over-arching approaches for this policy area have been considered.

No further amendments have been made to the proposed policy following the Regulation 18 consultation.

No changes are proposed to the sites already identified in the adopted WMSP nor are any additional waste sites identified.

It is proposed that this section will replace Suitable Locations for Waste Development (WMP7a, WMP7b) on pages 59-62 of the WMP. It is also proposed that Policies WMP7a Sustainable Locations for Waste Development (excluding land disposal) and WMP7b More Detailed Criteria for Development are superseded by RW1 Sustainable Locations for Waste Development (excluding land disposal).

Purpose of Policy RW1

To identify broad areas (Areas of Focus) within the Plan Area within which more sustainable opportunities for locating waste recycling and recovery facilities are more likely to be found.

5.2 *National policy requires local planning policy to give a clear indication to industry about the areas where development might be acceptable and to provide flexibility to allow for responses to changes in circumstances.*

5.3 *This policy relates to waste treatment facilities, i.e. facilities involved in processes in the waste hierarchy excluding land disposal. Transfer facilities are included because they play a fundamental part in moving waste to and from the facilities referred to in this policy, and increasingly waste transfer is being integrated with waste processing (such as that which takes place at Materials Recovery Facilities) at the same site and so there is less distinction between them. Land disposal is covered separately in Policy WMP 8.*

5.4 *This policy identifies areas hereon called 'Areas of Focus' where the best opportunities for the development of waste recycling and recovery facilities are most likely to be found. Areas of Focus indicate broadly the areas where the greatest sustainability benefits are likely to be achievable based on the application of national policy. However this policy recognises that there may be sites which are acceptable in principle but are beyond the Areas of Focus. For example, there may be*

Providing for Waste 5

sites just outside of the Areas of Focus where there may be overriding sustainability reasons for permitting development, such as supporting movement up the waste hierarchy or being well-related to the strategic road network. The policy therefore does not precisely define boundaries, and the overall sustainability benefits of proposals will be considered on their merits. Consideration of locations within the Areas of Focus also needs to be balanced with ensuring the Plan is deliverable, and as such the Plan considers economic viability which is often influenced by economies of scale.

5.5 The Areas of Focus are those where the greatest sustainability benefits are likely to be achieved regarding new waste development or extensions to existing sites as they are more likely to be close to:

- waste arisings,
- better transport network,
- complementary industries and waste development for potential co-location benefits,⁽⁴⁾
- existing facilities where there is scope for physical site extension (for detail about alterations within the site boundary of existing facilities See Policy WMP 22).

5.6 The Areas of Focus reflect the fact that the majority of the population and businesses in the Plan Area are located along the coastal strip so this is where the main proportion of the largest waste streams (C&I, CDEW, and LACW wastes) is either currently generated or likely to be in the future according to predicted growth areas in Local Plans. The Areas also reflect the road, rail and water transport connections within the Plan Area. Areas outside the Areas of Focus are generally more rural and less densely populated and therefore it is likely that less waste is generated and there are fewer opportunities for maximising sustainability. Much of these areas are also covered by landscape designations of the AONB and the SDNP.

5.7 The policy also recognises that with modern design and operational techniques, waste management facilities can increasingly be accommodated in general industrial areas as a B2 use class, and even more so with the revised waste hierarchy which includes 'preparation for reuse'. Detailed criteria to manage the potential impacts of development is covered in the development management policies later in the Plan Document. Proposals will also be subject to the relevant statutory pollution control regulatory frameworks.

5.8 Applicants are expected to make reasonable efforts when seeking to demonstrate that there are no suitable sites within the preferred locations under criteria A2 and B2. The level of detail should be appropriate to the scale and type of facility being proposed.

4 See Policy WMP 19.

5 Providing for Waste

5.9 *Sites identified within the Waste and Minerals Sites Plan and Schedule of Suitable Industrial Estates are all considered to be within the Area of Focus and located on one or more of the types of land specified under criteria B1; as such these sites are considered in accordance with this Policy.*

Policy RW1

Sustainable Locations for Waste Development (excluding land disposal)

The principle of the development will be supported where:

A1. The site is located within a broad Area of Focus indicated on the Key Diagram and described in paragraph 5.5, or

A2. It has been demonstrated there are no suitable sites available within the Areas of Focus to meet identified needs, or the proposed development is a small-scale facility / extension to existing facility predominantly to meet smaller, more localised needs only⁽⁵⁾.

In addition to criteria A1 or A2 the proposed development must also demonstrate:

B1. The proposed development is located on: general industrial land including general industrial estates, employment land (B2/B8 uses), previously-developed land, or land already in waste management uses; or

B2. There are no suitable sites available within the locations listed under criteria B1; or

B3. The proposal is located at a minerals working or landfill site and the development's lifespan will be limited to the lifespan of the minerals operation or landfill site⁽⁶⁾, unless there are overriding reasons why the lifespan should be extended.

⁵ *Smaller, localised facilities can be essential in helping to provide local solutions for collecting, sorting, bulking, and transferring and treating wastes in complementing the waste treatment provided at more strategic larger-scale facilities.*

⁶ *The lifespan of a site may, but does not necessarily, include restoration phases.*

Providing for Minerals 6

6 Providing for Minerals

Sustainable Use of Aggregates (RM0)

Explanation

Following the 2020 consultation on the Draft Revised Policies a further review of the likely aggregate demand (See RM1) was undertaken. As part of that review it was identified that, whilst the adopted Waste and Minerals Local Plan promotes waste minimisation, it does not specifically address the topic of resource use and that support for resource minimisation could be more explicitly expressed. Representations received during the 2020 consultation also queried whether the use of recycled and secondary aggregates should be prioritised over virgin material. The Authorities recognise that aggregates are essential for construction, but they are also a finite resource which should be used prudently. The NPPF also recognises this in its definition of Sustainable Development (paragraph 8). Policy RM0 seeks to address these omissions.

6.1 It is proposed that this section is inserted at the prior to Provision of aggregates WMP11 (pages 78-81) in the WMP.

Purpose of Policy RM0

To ensure the sustainable use of aggregates.

6.2 *Aggregates such as sand and gravel are used in construction, and are usually mined from the land, dredged from the seabed or recycled from existing construction industry waste. Secondary aggregates such as certain mineral waste can also be used in construction. As a mined or dredged material, aggregate is a primary resource of which there is a finite supply; likewise, recycled aggregate is limited by the material available to recycle. The NPPF (paragraph 8) explains that Sustainable Development includes using natural resources prudently, whilst also supporting growth, innovation, and improved productivity. This is also supported by the forthcoming [Circular Economy package](#). Policy RM0 seeks to promote that when aggregates are used in construction they are used in the most sustainable way.*

6.3 *There are now a growing number of examples of low aggregate construction developments. Originally these may have been a consequence of another design choice, for example in the form of temporary buildings, or as exemplars such as the [Glyndebourne Pavilion](#). However, more recent prefabricated building techniques and innovations in construction technology such as the [K-Brick](#)*

6 Providing for Minerals

may prove to be more prevalent in the future as the development industry takes on the challenge to deliver buildings which meet net zero carbon objectives. In many cases these techniques and technology also reduces aggregate consumption.

6.4 *Reducing the amount of aggregates used in construction will require changes in both construction methods and technology. And, as aggregates are just one of the materials used in construction, it is important that this is considered as just one element of the design process for any development. This will be achieved directly within the South Downs National Park and Brighton & Hove, and by working with the Districts and Boroughs within East Sussex, who are the planning authorities for most types of development by helping them to include circular economy and resource minimisation policies within their local plans.*

6.5 *After minimising the amount of aggregates, developers should seek to use recycled and secondary aggregates in place of primary materials wherever possible. However, secondary materials may not always be suitable owing to limitations relating to material specifications and availability. Where this occurs, the design choice should be explained within the proposal.*

Policy RM0

Sustainable use of aggregates

Innovative proposals that a) minimise the quantities of aggregates used in construction, and b) prioritise the use of recycled and secondary aggregate over virgin aggregate, are encouraged and will be supported.

East Sussex County Council will support Local Plan policies that promote sustainable aggregate use as part of design or Circular Economy policies within Local Plans being prepared by the District and Borough Councils within East Sussex.

6.6 *Policy RM0 is a starting point, for setting a clear direction in relation to ensuring the sustainable use of aggregates. As knowledge and experience develops into good practice it will inform future reviews of the plan, under which this policy may be refined.*

6.7 *Applicants should address the use of aggregates as part of their wider consideration of resources used when designing their developments. These design choices should be documented and presented through Design and Access, Sustainability or Circular Economy statements as applicable. Applicants are also encouraged to engage in any design panels, where available.*

Providing for Minerals 6

Provision of Aggregates (RM1)

Explanation

The current adopted WMLP makes provision for 0.1 million tonnes per annum (mtpa) of land-won aggregate during the plan period, and commits the Authorities to providing a land bank of 7 years permitted aggregate reserves. The permitted sites identified to contribute to this provision in the WMLP are Lydd Quarry (area in East Sussex), and Novington sandpit located within the SDNP. This provision rate is therefore a combined rate including both sharp sand and gravel and soft sand.

In coming to the 0.1 mtpa provision rate the Authorities maintained that the Plan Area was a "special case" recognising the particular circumstances of:

- low production;
- remote reserves;
- high dependence on marine landings; and
- large area affected by environmental constraints/designations

Following the Public Examination into the Waste and Minerals Sites Plan in 2016, the Inspector concluded in his report that "[...] the Plan cannot maintain provision for the production of land-won aggregates at a rate of 0.10 mtpa throughout the Plan period. There will be no permitted reserves at that date because either mineral working under the planning permissions will cease in accordance with a condition of the permission or the workable reserves will be depleted at current rates of production. For that reason alone it will not be possible to maintain a land-bank of at least 7 years". The Authorities accepted the Inspector's conclusions and recognise that the WMLP aggregate provision levels need to be reassessed.

Soft Sand

The main source of soft sand in the South East (the Lower Greensand Formation) runs through Kent, Surrey, Hampshire, West Sussex and peters out just over the border of East Sussex. There has been limited working of this material in the Plan Area in recent times. Novington Sandpit is the only permitted soft sand site and lies within the South Downs National Park in the East Sussex Plan Area. It is understood that there is a reserve of around 250,000 tonnes still to be worked as part of the extant planning permission.

However, the site has been inactive since 2013 and any reported sales figures prior to that date are considered to be confidential. On that basis it is not possible to calculate an LAA rate and it assumed that the need for soft sand in the Plan Area has entirely been met through imports for at least six years.

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The Authorities have worked with the other South East Mineral Planning Authorities to agree a Position Statement on Soft Sand. This sets out the context for soft sand provision at a regional level. Following on from that work, the Authorities have entered into a Statement of Common Ground with Kent County Council and West Sussex County Council which acknowledges the current reliance on imported materials to meet the needs of the Plan Area and explains the process each Mineral Planning Authority will go through to meet the 'steady and adequate supply of minerals' required by the NPPF⁽⁷⁾.

Future Provision

The NPPF states that mineral planning authorities should plan for a steady and adequate supply of aggregates by preparing an annual Local Aggregate Assessment (LAA) to forecast demand, based on a rolling average of 10 years sales data and other relevant local information. The LAA should include an assessment of all supply options including land won, marine dredged, secondary and recycled sources. The Authorities have carried out a review of aggregate provision, and further details and calculations are set out in the LAA 2019, and LAA 2020 (dashboard) (to be updated).

During the Call for Evidence and Sites (CfES) the operator of Lydd quarry submitted proposed extension areas for the site. These were considered for inclusion in the draft Plan but were not considered acceptable as allocations due to the significant harm mineral working would cause to the interests of designated sites located within the vicinity of the proposals. In addition, the Authorities consider that there are adequate and suitable alternative supplies of material to the proposals which would result in lesser environmental effects. No other aggregate sites were submitted at the CfES stage.

Following consultation on the draft Revised Policies in 2020 some representations were received relating to aggregates and the provision of material to the Plan Area. These include comments and queries concerning marine dredged aggregate (MDA), recycled aggregates and the calculation and methodology of provision levels. The operator of Lydd quarry also submitted a revised proposal for a quarry extension with more clarified extraction proposals. The Authorities have reassessed the proposed allocations but consider that the issues of harm to designated sites remain and alternatives exist. The proposed allocations are therefore not included in the draft Plan.

New aggregate data has been collected and published since 2020, mainly as a result of the annual aggregate monitoring surveys. Revised housing projections figures are also now available which indicate that forecasts of demand for aggregates over the Plan period may now be higher

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since the publication of the consultation document in 2020. Data is set out in the [LAA 2019](#) (and [LAA 2020 dashboard- update once 2021 LAA is drafted](#)), and the supporting documents including the Aggregate Data Technical Paper ([link](#)).

Following the consultation on the draft Revised policies in 2020, policy RM1 and supporting text have been revised to reflect the matters above. In summary, the following chapter now includes further explanation of how provision will be secured for the Plan Area together with updated information and data. Policy wording has been clarified to confirm that new rail and wharf infrastructure would be supported and where relevant minor corrections have also been made. Some issues are covered further in the Aggregates Technical Paper, which also include detailed workings of the methodology of assessing supply and demand in the Plan Area.

It is proposed that this section replaces Provision of aggregates WMP11 (pages 78-81) in the WMP, and Section 4 Providing for Minerals paragraphs 4.1 to 4.6 (page 24) in the WMSP.

Purpose of Policy RM1

To ensure sustainable provision for an appropriate level of aggregates for consumption in the Plan area over the duration of the Plan period.

Introduction

6.8 *Historically there have been low levels of extraction of 'land-won' aggregates in East Sussex, and imports of marine dredged aggregate (MDA), crushed rock and other aggregates have been important in meeting local construction needs. These have been imported via a mixture of rail, road and wharf. Within the Plan Area two types of aggregate resource are to be found: sharp sand and gravel, and soft sand, which have different uses. Sharp sand and gravel uses include concreting applications and soft sand, also known as building sand, uses include production of mortar.*

6.9 *There is currently one working sharp sand and gravel extraction site in the east of the Plan area at Lydd. Lydd quarry straddles the East Sussex/Kent border and extraction is currently taking place within East Sussex. Approximately 50% of the production is exported to Kent and it is estimated that less than a year of reserves remain. If this site were to contribute to future aggregate provision in the Plan Area, further reserves at the quarry would need to be identified. The area around Lydd*

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Quarry is constrained by both National and International environmental designations including SSSI, Special Protection Area and Ramsar site. The designations cover or are adjacent to all the sand and gravel resource in this part of the County.

6.10 *The majority of land-won sharp sand and gravel deposits in East Sussex are found in the coastal areas and river valleys. Having assessed these resources, the Authorities have concluded that identification of feasible extensions or new land - won sites in the Plan area is not possible due to the environmental constraints which are considered overriding.*

6.11 *Apart from production at Lydd quarry and road imports from outside the Plan Area, aggregate supply is currently received through the Ports of Shoreham, Newhaven and Rye, and at a railhead at North Quay in Newhaven. Marine imported material is also exported by rail from a different rail head at East Quay, Newhaven. There are also permitted CDEW sites producing recycled aggregates which can in some cases substitute for sharp sand and gravel end-uses, and secondary aggregates, such as brick waste, are also produced and imported into East Sussex.*

6.12 *A new aggregate processing plant, aggregate bagging plant, concrete batching, and rail siding extension has recently been constructed at Fishers Wharf, Newhaven Port. The operation involves the import of marine dredged aggregate (MDA). The plant has now commenced operation with both marine imports being received and rail exports taking place. Once fully implemented the development will provide up to 0.42 mtpa of new import capacity. The majority of the material will be sold and used within the Plan area and a proportion will be exported by rail.*

6.13 *The Plan Area appears to have been reliant on soft sand imports for a number of years. The Authorities have undertaken a number of surveys to confirm this assumption, and to understand where the material is imported from and how the need for soft sand is currently being met. As a partner Authority for waste and minerals plans in Hampshire, West Sussex, East Sussex and Brighton and Hove, the SDNPA is working on a unified position across the South Downs National Park relating to the provision of soft sand that is consistent with national policy within a designated landscape.*

Future Provision

6.14 *Government policy requires mineral planning authorities to plan for a steady and adequate supply of aggregates and so in undertaking the WMLP Review the Authorities have assessed how provision can be continued in the Plan Area. Much of the supporting evidence for the WMLP review is set out in the Authorities' LAA. The most recent LAA 2020 Dashboard [\(link\)](#) indicates that at current demand levels the rate for land-won material is 0.15 mtpa. This figure has been calculated on the basis of sales figures for sharp sand and gravel only as the only permitted soft sand site in the Plan area has not produced any mineral for some years. It is acknowledged that less than a years reserve exist at the only active sharp sand and gravel site in the Plan Area. The LAA also identifies rates for other types of aggregate provision including marine and rail imports. It is a*

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particular characteristic of this Plan area that over 80% of aggregates consumed are imported (based on 2014 figures). Indeed, the Plan area has a long-standing unique and particular land-won aggregate situation which has been recognised as a "special case".⁽⁸⁾

6.15 If demand for aggregates in the Plan Area were to remain constant then the total rate of aggregates considered for provision over the Plan period would be around 0.7 mtpa. The Authorities are also required to assess the effect of demand changes on provision. To do this the Authorities have used projections of homes and infrastructure over the next decade. Calculations carried out for the Review (see Aggregates Data Technical Paper - link) indicate that aggregate demand requirements could double, meaning that the total provision for the 15 year Plan Period (15 years from 2019, therefore to 2034) could be in the region of about 1.48 mtpa.

6.16 Unused permitted capacity remains at all infrastructure and processing facilities which could be utilised in the future with the minimum of constraints. A significant amount of aggregates imported into Shoreham Port on the West Sussex side are consumed in the Plan Area and it is understood that additional unrestrained capacity remains at the Port. There is also further capacity available for the production of recycled and secondary material (see Aggregates Data Technical Paper - link).

6.17 In terms of quantity the supply of MDA from Fisher's wharf, once fully operational, would effectively provide an equivalent amount of aggregate to substitute for land-won sharp sand and gravel from Lydd where resources are near exhaustion. It is also necessary to ensure that the end uses of these materials and their markets are comparable, and that sufficient reserves of MDA are available. In terms of continuing supply to the existing market area, the Fishers Wharf development at Newhaven could provide for the western side of the Plan Area, and the Authorities consider that any market variations to the east could be compensated for by, for example, further imports using existing capacity at Rye Harbour as well as from Kent. The Crown Estate advises that marine aggregate is wholly interchangeable with land based sand and gravel, and can perform the same technical tasks. Reserves off the south coast of Sussex and Hampshire are circa 80 million tonnes with a life of 24 years at 10 year average levels of extraction. New capacity is also expected to come on stream in the very near future. The environmental impact of dredging is considered at the application stage of the Marine Licencing system which is determined by the Marine Management Organisation.

8 During the review process for the Secretary of State's Proposed Changes to the Review of Policy M3 of the South East Plan the Councils requested to be treated as a special case. This recognised the particular circumstances of low production; remote reserves; and high dependence on marine landings; in an area largely affected by environmental constraints/designations.

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6.18 *An assessment of the existing capacity at permitted import and processing facilities in the Plan Area indicates that adequate capacity exists to accommodate at least double the current levels of demand. Recent revised housing projections (2020 data) however point to a possible higher level of demand, (although this assumes current building methods endure). All details are set out in the LAA and the Aggregate Data Technical paper [\(links\)](#).*

6.19 *It is acknowledged that if demand were to exceed these levels, there could potentially be shortfalls in supply during the Plan period. However, the Authorities consider that the market is likely to respond in such circumstances to enable additional provision by, for example, diverting exports. In the past regardless of the aggregate demand at that time, supply has occurred and construction has taken place in the Plan Area. In addition, if demand is high enough it could be that market conditions are favourable for new import and recycling infrastructure and/or sites which, where appropriate, would be supported by RM1 and other policies in this Plan. Furthermore, the amount of aggregates needed in new buildings may reduce over time as construction methods change in response to net zero carbon requirements. The sustainable use of aggregate is supported in policy RM0.*

6.20 *With regards to soft sand it is considered that the most appropriate approach is to safeguard the soft sand resource and not allocate any further sites in the Plan Area. It is not appropriate to designate Areas of Search in a protected landscape and no aggregate sites have been put forward during the consultation process in either the National Park or the AONB. ⁽⁹⁾⁽¹⁰⁾⁽¹¹⁾*

6.21 *The Authorities consider that based on current evidence there are no acceptable or feasible land-won sites available, and that in the context of the Plan Area's long established "special case", future provision in the Plan Area has to be supplied from a combination of recycled and secondary material, and rail, wharf and other aggregate imports. This provision strategy does not therefore include land-won material from within the Plan Area and does not require the allocation of sites or setting of a specific "landbank" for aggregates.*

9 Any future applications for soft sand extraction in the National Park will need to address paragraph 177 of the NPPF and Policy SD3 of the South Downs Local Plan.

10 Mineral extraction is considered to be 'major development' as defined in the Glossary of the NPPF and the Town and Country Planning (Development Management Procedure) (England) Order 2015. Paragraph 177 of the NPPF states that planning permission should be refused for major development in National Parks other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Footnote 60 of the NPPF states that the question of whether a development proposal is 'major' in a National Park is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.

11 Paragraph 177 of the NPPF relates primarily to the determination of planning applications in protected landscapes. However, to ensure that all local plan allocations are deliverable, it is also necessary to consider the issue of major development at the plan making stage.

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6.22 *The Plan strategy for meeting the sand and gravel needs of the Plan Area is therefore through supporting and encouraging imports through existing permitted facilities, as well as utilising permitted recycled and secondary aggregate capacity, and encouraging sustainable usage of aggregates. Proposals for new rail and wharf import infrastructure will be supported, where appropriate. To ensure that that supply is secured and maintained through import facilities it is important that minerals infrastructure including wharf and rail heads are adequately safeguarded. This is covered in policy RM5. In addition, any extensions or improvements to existing safeguarded sites which improve the operation and/or efficiency of the landing, processing, handling and storage of minerals will normally be supported. The reuse of existing infrastructure will be supported where appropriate.*

6.23 *The strategy aims to protect and support every mechanism for enabling supply. This will allow provision for at least a doubling of current demand which equates to just over 22 million tonnes (mt) of aggregates over 15 years at an average of approximately 1.48 mtpa, peaking at 2.02 mtpa in 2025/26. Of the 22mt, between 14.43 mt & 16.56 mt will be sourced from imports, using existing permitted facilities. Aggregate supply and demand in the Plan area, including the annual provision figure, will be continually monitored via the Authorities' Monitoring Report and the Local Aggregate Assessment, and will be reviewed when required by national legislation.*

6.24 *In the event that land-won aggregate proposals are received they will be considered against existing Development Plan policies. All Plans should be read as a whole and criteria based policies within the WMLP ensure that there is complete policy coverage for any future proposal.*

6.25 *Proposals for new sites and additional capacity for aggregate importation infrastructure and recycled and secondary aggregate production will also be subject to the environmental protection requirements set out in other plan policies.*

6.26 *Proposals which may involve marine operations should also consider Policies S-AGG-3 and S-AGG-4 from the MMO South Marine Plan. These policies refer to proposals in areas where high potential aggregate resource occurs, and local sourcing of aggregates respectively.*

Policy RM1

Provision of aggregates for consumption in the Plan Area

The Authorities will enable the provision of at least 22 million tonnes (averaging 1.48 mtpa) of aggregate material over the the Plan period by seeking to protect, maintain and enhance existing:

- a) aggregate importation infrastructure and capacity; and*

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b) recycled and secondary aggregate production

Proposals for new rail and wharf import infrastructure, and additional capacity for a) and b) (including increased operational capacity within the site boundary of existing infrastructure) will be supported. In particular, support will be given to proposals which further enable sustainable provision of aggregates by sea and/or rail.

Provision for an additional extraction area at Aldershaw Farm (RM2)

Explanation

An extension to the Aldershaw Tiles extraction site was promoted by the operator in response to the Call for Evidence and Sites 2017 and was included in the 2020 consultation draft (Regulation 18) version of the Revised Policies Document (RPD). The tile works is a small-scale operation which primarily produces handmade tiles, many of which are used in the restoration of historic buildings. Clay supplies are now running low at the extraction site and an extension could extend the lifetime of the facility by providing a potential minerals reserve of between 25 and 30 years.

Since publishing the Regulation 18 RPD, the site assessment has been updated in accordance with the revised NPPF 2019 and the subsequent revised NPPF 2021 which now places higher protection on the AONB, ancient woodland and irreplaceable habitats. Paragraph 180 and Footnote 63 states that development resulting in the loss or deterioration of ancient woodland should be refused unless where wholly exceptional circumstance exist and where by a suitable compensation strategy exists.

Mineral extraction is a type of operation regarded as major development in the NPPF and in legislation[1]. Though, under Footnote 75 of the NPPF (2021), for the purposes of Paragraphs 176 and 177, the decision maker must determine whether the development constitutes major development.

Under paragraphs 176, 177 and Footnote 60 of the NPPF (2021), where a decision maker judges a proposal to represent major development, permission should not be granted other than in exceptional circumstances and where the development is demonstrably in the public interest.

As the previously promoted extension would extend into an area of ancient woodland, the extension site proposed in response to the Call for Evidence and Sites is therefore no longer being allocated. Sites outside of areas of ancient woodland may be available and further information on site selection and feasibility of extraction is anticipated from the landowner/operator.

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The Authorities believe that development for clay extraction could take place outside the area of ancient woodland. Any proposal for extraction within or within the vicinity of ancient woodland would be subject to further consideration in light of paragraphs 176, 177 and 180 and Footnotes 60 and 63 of the NPPF, as set out above.

The ultimate decision on exceptional circumstances and the public interest can only be taken when a planning application is submitted as exemplified by the following case:

R (Advearse) v. Dorset Council paragraph 46[2]⁽¹²⁾ sets out the successive stages for the consideration and implementation of the NPPF, particularly in relation to paragraph 177 of the NPPF (2021).

Since 2020, the Policy has therefore been revised in response to key responses, as follows:

- No longer allocating a specific site.
- Inclusion of a criteria based policy in line with national policy.

[1] Town and County Planning (Development Management Procedure)(England) Order 2015

[2] R (Advearse) v Dorset CC et al [2020] EWHC 807 (Admin) Paragraph 46

It is proposed that this section is appended to Provision of Clay (WMP13) on pages 84-85 of the WMP.

Purpose of Policy RM2

To ensure a continued supply of specialist clay.

12 46. Consideration and application of a policy such as the one stated at (what is now) paragraph 172 of NPPF 2019 [paragraph 177 of NPPF 2021] will not always be a oneoff event. The expectation is that policies in the NPPF will be considered at successive stages: for example, not only at the time a Local Plan is formulated, but also when subsequent decisions are taken on applications for planning permission. As the decisions in issue become more specific, the information relevant to the application of any particular policy is likely to change.

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6.27 *It has been identified that an additional extraction area for the Aldershaw Tiles site is required to ensure continued provision of clay for use in the production of specialist tiles. The products made at the Aldershaw Tile works include specialist clay tiles used in the restoration of historic buildings. The tiles may need to match original features, and so the colour and quality of these products is an important consideration.*

6.28 *The Policy aims to make provision for the specialist clay product, to meet the need from outside of areas of ancient woodland where possible, and to only allow development within designated ancient woodland in wholly exceptional circumstances, where a suitable compensation strategy exists and where it is in the public interest, in accordance with national policy. A final decision on whether exceptional circumstances exist can only be made when proposals come forward.*

Policy RM2

An area of additional clay extraction may be proposed in connection with the specialist tile manufacturing facility at Aldershaw Farm as identified on Map 10.2 [Minerals Sites and Infrastructure Map].

To be acceptable in principle, proposals for an additional extraction area must demonstrate that the following criteria are met:

- i. An assessment of the impact on the Ancient Woodland (Screen Wood and Lane Wood) must be carried out. Where necessary and in accordance with Natural England and the Forestry Commission's standing advice, appropriate buffers should be incorporated, and mitigation provided, to the satisfaction of both bodies.
- ii. The impact on the High Weald Area of Outstanding Natural Beauty must be assessed and appropriate mitigation should be included, if required, in consultation with the High Weald AONB Unit.
- iii. An assessment of the impact on the Beauport Park Local Wildlife Site must be carried out; and where necessary appropriate mitigation provided, in consultation with and to the satisfaction of the County Ecologist.
- iv. Access to the site is through the existing brickworks.

An appropriate mitigation and environmental enhancement scheme for the operations and restoration of the entire extraction site would be required as part of any permission.

Proposals must demonstrate how they have considered relevant Policies in the WMP, WMSP and the Development Plan (relevant Local Plan). Any application will be assessed in accordance with relevant development plan policies taking into account any material considerations.

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6.29 *Protected and notable species may be present within or in the vicinity of any future additional area of extraction. Appropriate assessments and surveys should be carried out in accordance with standing advice and development management policies within this Plan.*

6.30 *Any restoration plan should be supported by a landscape and ecological management plan.*

Safeguarding Mineral Resources (RM3)

Explanation

The provision of aggregates (minerals used for the construction and improvement of buildings or infrastructure) is important in ensuring that planned development in the Plan Area can be delivered. Directly linked to the provision of aggregates is the safeguarding of minerals resources and the safeguarding of minerals infrastructure. Safeguarding helps to ensure that minerals resources, which are finite in their supply, are not sterilised by other development.

Separate policies relating to safeguarding of mineral resources are contained within the Local Plan and Sites Plan. To avoid duplication of policy content, it is proposed that policies WMP14 and SP8 are combined into a single policy within the Waste and Minerals Local Plan.

It is also proposed that a list of exempt development relating to Minerals Safeguarding Areas (MSAs), Minerals Consultation Areas (MCAs) and prior extraction is included for clarity. This establishes the concept that not all development should be constrained by mineral designations.

The list of safeguarded resource sites will be moved to the policies map. The list of safeguarded sites has been included below for information. The strike-through indicates sites which are no longer being safeguarded.

Gypsum:

- Brightling Mine/Robertsbridge Works, Mountfield

Sand and Gravel (inclu. soft sand):

- Novington Sandpit
- Ditchling/Plumpton Reserve ⁽¹³⁾
- ~~Scotney Court Farm, Jury's Gap Road, Camber, near Lydd~~

13 This is a new safeguarded resource.

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- ~~Scotney Court Extension and Wall Farm, Jury's Gap Road, Camber, near Lydd~~⁽¹⁴⁾
- ~~Broomhill, near Lydd~~⁽¹⁵⁾

Clay:

- Ashdown Brickworks, Bexhill
- Little Standard Hill Farm, Ninfield
- Chailey Brickworks, Chailey
- Hastings Brickworks, Guestling
- Aldershaw Farm, near Hastings
- Horam Brickworks, Horam

Since the consultation in 2020, the wording of the policy has been updated to ensure that 'potentially' viable resources are safeguarded to address the issue of viability changing overtime.

This section replaces Safeguarding Mineral Resources (WMP14) on pages 86-88 of WMP and paragraphs 4.1 - 4.11 and Policy SP8 on pages 24-25 of the Waste and Minerals Sites Plan. Policies WMP14 and SP8 are superseded by Policy RM3.

Purpose of Policy RM3

To ensure known mineral resources of local importance are safeguarded.

6.31 *The National Planning Policy Framework requires MPAs to prevent mineral resources from being unnecessarily sterilised. Sterilisation of known or potential resources would reduce the ability and flexibility to supply future demand. However, it is also important to find a balance between protecting mineral resources for the future and allowing for necessary development of some of those areas.*

- 14 Permitted extraction sites (Scotney Court Farm, Scotney Court extension and Wall Farm) are currently being worked and near exhaustion at Lydd Quarry. The continued safeguarding of these sites is therefore not considered necessary. Furthermore, the area around Lydd Quarry is constrained by both National and International environmental designations and further working is not feasible due to the environmental constraints which are considered overriding.
- 15 The area around Lydd Quarry which includes Broomhill is constrained by both National and International environmental designations. Mineral working at Broomhill would therefore not be feasible due to the significant harm mineral working would cause to the interests of designated sites which are considered overriding. Broomhill is therefore no longer safeguarded.

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6.32 Government advice contained in the NPPF and other guidance ⁽¹⁶⁾ requires mineral planning authorities to define Mineral Safeguarding Areas (MSAs) which should contain resources that are of local and national importance to warrant protection for future generations. Mineral safeguarding allows for potential resource to be examined; however, there is no presumption that resources defined in MSAs will be worked.

6.33 Minerals Consultation Areas are areas where Local Planning Authorities will consult with the Authorities on alternative development proposals, not including excluded development. They have been identified using information on known minerals resources and existing permitted extraction and transport infrastructure sites.

6.34 Where non-mineral development is proposed which could potentially sterilise minerals resource, developers will be required to carry out investigation work to ascertain whether economically viable mineral resources are present and whether prior extraction is practicable. The results of this work should be reported in a 'Minerals Resource Assessment' which should be proportionate to the nature and scale of the proposal (for more detail see separate guidance on safeguarding). For the Authorities to raise no objection to the non-mineral development, they will need to be satisfied that either minerals sterilisation will not occur (either because the mineral resources are not economically viable or that an appropriate and practicable level of prior extraction can take place) or because there is an overriding need for the development.

6.35 Clay sites, permitted Gypsum reserves and soft sand are safeguarded. No strategic need for chalk extraction was identified in the WMP, and there is no evidence to suggest that the situation has altered. No areas have therefore been identified to safeguard chalk resource within the review.

Soft Sand

6.36 When considering proposals for mineral extraction, national policy ⁽¹⁷⁾ requires planning authorities to 'provide the provision of non-energy minerals outside of National Parks, the Broads, Areas of Outstanding Natural beauty and World Heritage Sites, scheduled monuments and conversation areas' where practicable. However, the soft sand resource within East Sussex lies entirely within the boundary of the South Downs National Park. This soft sand resource then extends through the SDNP and its boundary in West Sussex and Hampshire.

6.37 As soft sand resource in the south east is relatively limited and constrained by a number of designated landscapes ⁽¹⁸⁾, the Plan safeguards the extent of the soft sand resource in East Sussex.

16 British Geological Survey (BGS) guidance for Mineral Safeguarding published in 2011.

17 NPPF paragraph 211

18 South East Soft Sand Position Statement

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6.38 *The Authorities consider that the following categories of development/application type are exempt from the Policy requirements of RM3, RM4, RM5 and RM7. The exemptions would apply to sites located in MSAs and MCAs; to the requirements for prior extraction; and for consultations relating to both mineral resources sites and minerals infrastructure sites. Those listed would also be exempt from the requirements of Mineral Resource and Infrastructure Assessments.*

Excluded Development

- *Householder planning consent: Applications for alterations to existing single buildings including works within the boundary/garden of a house i.e. domestic extensions, conservatories, loft conversions, dormer windows, garages and similar structures (car ports, outbuildings) within the curtilage of an existing dwellinghouse*
- *Applications for Advertisement Consent*
- *Applications for Listed Building Consent*
- *Lawful Development Certificate (LDC) for existing use, proposed use, or operation or activity in breach of a planning condition*
- *Applications for Tree Works (including consent under Tree Preservation Orders and notification of proposed works to trees in conservation areas)*
- *Application for non-material amendments*
- *Applications for small-scale urban infill development within existing built-up areas i.e. the development of a small gap between existing buildings/enclosed by other types of development*
- *Developments within a conservation area within existing urban areas*

Policy RM3

Minerals Safeguarding Areas

Mineral Safeguarding Areas (MSAs), as shown on the Policies Map, identify potentially viable land-won mineral resources and sites.

Proposals for non-minerals development on or near the MSA that would sterilise or prejudice the extraction of the mineral resource, or result in incompatible development, should not be permitted.

Development proposals within areas shown as Mineral Safeguarding Areas on the Policies Map or that may affect a mineral operation or resource, must demonstrate that mineral resources will not be sterilised and the development is not incompatible with any permitted minerals operations.

The Authorities will periodically review and update Mineral Safeguarding Areas as required.

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Prior Extraction of Mineral Resources (RM4)

Explanation

Prior extraction of minerals resources is required by the NPPF (2021) to be promoted and considered for development proposals which would sterilise resources. Following an assessment of viability of sand and gravel resource within the Plan Area, it is proposed that no additional sharp sand and gravel resource will be safeguarded. A prior extraction policy is required to ensure that soft sand resource (all of which is to be safeguarded), clay and gypsum reserves are appropriately safeguarded and does not become sterilised. A separate policy requiring prior extraction where feasible and practicable has been included.

No changes to the direction of this Policy have been made since the 2020 consultation. For clarity, some minor updates to the supporting text have been made.

Purpose of Policy RM4

To ensure the best and most sustainable use of minerals by seeking their extraction prior to development.

6.39 *The NPPF requires that MPAs should set out policies to encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place. Where non-mineral development is proposed, developers may be required to carry out investigation work to ascertain whether there are economically viable mineral resources present and whether prior extraction is practicable. The results of this work should be presented within a Minerals Resource Assessment (MRA) which should be proportionate to the nature and scale of the proposal. Guidance on preparing a MRA can be found within the separate guidance document on safeguarding. The Minerals Resource Assessment may conclude that prior extraction is not practicable due to constraints and location, delay to construction timetable, and effect on landform thereby making the site not viable for the proposed development.*

6.40 *The Mineral Planning Authority will consider the conclusions of the Minerals Resource Assessment, including on prior extraction, in forming its view on the proposed development and provide advice to the Local Planning Authority.*

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6.41 *Where planning permission is granted for the prior extraction of minerals, conditions will be imposed to ensure that the site can be adequately restored to a satisfactory after-use should the main development be delayed or not implemented.*

6.42 *Policy RM4 must be read in conjunction with the Excluded Development list, please refer to paragraph 6.38 for further details.*

Policy RM4

Prior Extraction of Mineral Resources

All developments permitted within Mineral Safeguarding Areas should undertake prior extraction unless it can be demonstrated to the satisfaction of the MPA that:

a)The mineral resource would not be sterilised by the proposed development.

and/or

b)The mineral cannot be practically or feasibly extracted.

Safeguarding Minerals Infrastructure (RM5)

Explanation

Safeguarding protects existing and planned infrastructure, such as railheads and wharves, which are integral to the supply, storage and transportation of minerals. Within the Plan Area, wharves at the ports of Newhaven, Shoreham and Rye are safeguarded in order to preserve mineral landing capacity, along with railheads at Newhaven and the British Gypsum rail facility near Robertsbridge. It is, therefore, important to review safeguarding arrangements at the same time as a review of mineral provision.

The introduction of sensitive land uses in close proximity to minerals operations can have a detrimental impact on their ability to effectively operate. Issues such as noise and dust from existing infrastructure sites can affect incompatible development such as residential uses negatively. It is necessary to protect these mineral facilities from encroachment of non-minerals development to support continued effective working of these facilities, therefore it is proposed that reference to the Agent of Change principle (para 187 of NPPF) is added to the Policy. *The list of safeguarded minerals infrastructure sites will be moved to the Policies Map.*

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The Newhaven Enterprise Zone, and its Strategic Framework, which includes the Port of North Quay has been considered as part of the review. However, it is considered that there is no need to change the direction or wording of the policy.

Since the 2020 consultation, the direction of the policy has not changed, however amendments have been made to the supporting text. The term 'disturbance' is now defined within the supporting text. The wording within the policy has also been amended to ensure consistency with other policies.

It is proposed that this section replaces Safeguarding Railheads and Wharves Policy (WMP15) on pages 89-90 of WMP and pages 26-27 of the Waste and Minerals Sites Plan, and that Policies WMP15 and SP9 are superseded by RM5.

Purpose of Policy RM5

To ensure the continued provision of minerals to the plan area by protecting essential minerals infrastructure from encroaching development.

6.43 National Policy requires Mineral Planning Authorities (MPAs) to assess the need for existing, planned and potential wharf and rail facilities to be safeguarded and to encourage and promote the use of sustainable transport modes for the movement of minerals. Sustaining imports of marine aggregates through local wharves is particularly important in the Plan Area because of the scarcity of viable land based mineral resources in this area.

6.44 Marine borne aggregates are currently imported at the Ports of Rye, Newhaven and Shoreham. Material for the plasterboard factory at Robertsbridge is imported by rail. Bottom ash produced by the Newhaven Energy Recovery Facility is exported by rail to a processing facility outside the County. Crushed rock and other aggregates are imported by rail into the Plan Area at Newhaven. The majority of aggregates movements within the Plan Area are currently made by road.

6.45 There are currently no active chalk sites in the Plan Area and more recently chalk has been imported by road from West Sussex. Clay resources are linked to brickworks and none of these sites are close to rail facilities or ports to transport bricks within or out of the Plan Area. More detailed support for a modal shift in transportation of minerals is covered in Policy WMP 18.

6 Providing for Minerals

6.46 *Proposals for other uses at minerals wharves must demonstrate that sufficient alternative mineral wharf capacity (tonnage) is deliverable and available to ensure no net loss of capacity within the port before the Authorities would accede to alternative development of the site. Proposals for new residential, business or amenity development in proximity to aggregate wharves should be assessed to ensure the impact of existing operations is fully addressed. The safeguarding arrangements would apply to all existing permitted, planned and potential (e.g. when new sites come forward or when suitable sites are released from their previous use) sites regardless of whether they are currently in use.*

6.47 *Proposals affecting safeguarded mineral infrastructure sites or within MCAs around these, including rail depots, wharves, concrete batching and asphalt plants, and aggregate recycling sites should be supported by a Mineral Infrastructure Assessment (MIA). This should provide sufficient evidence which is proportionate to the nature and type of development, to enable the MPA to assess whether the proposed development is likely to have an adverse effect on the facility including its capacity. Further guidance on preparing the MIA can be found within the separate guidance document on safeguarding.*

6.48 *The NPPF requires that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Development proposals in the vicinity of safeguarded wharves (including vacant wharves) and railheads should be designed to minimise the potential for conflicts of use and disturbance (e.g. light disturbance, noise pollution, dust, odour, other emissions, impact on visual amenity of potential occupiers and impacts arising from traffic movements associated with Minerals Infrastructure sites), in line with the Agent of Change principle as set out within the NPPF⁽¹⁹⁾.*

6.49 *The Joint Area Action Plan (JAAP) for Shoreham Harbour which was adopted in October 2019 sets out the future vision and planning policies for the Shoreham Harbour regeneration area. The intention is to consolidate port related uses in the eastern harbour arm. It is important that wharf safeguarding policies are applied to ensure capacity is maintained whilst regeneration proposals come forward.*

6.50 *Shoreham Port is partly within West Sussex, so landings at wharves in the West Sussex part may also help meet demand in the western part of the Plan Area. On that basis, provision of equivalent capacity (tonnage) of minerals wharfage within either part of Shoreham Port may be acceptable subject to similar safeguarding by West Sussex County Council as Minerals Planning Authority. Future joint working by authorities on the JAAP has been addressed through a Statement of Common Ground which has been agreed between the Shoreham Harbour Planning Authorities and the Shoreham Port Authority.*

19 Paragraph 187 of the NPPF (2021)

Providing for Minerals 6

6.51 *The wharves and railheads safeguarded for the purposes of minerals transportation are listed on the Policies Map. A list of the permitted mineral infrastructure sites is published alongside the Annual Monitoring Report (AMR) on the County Council's website. It is updated periodically outside the Annual Monitoring Report process. Updated GIS layers are re-issued accordingly.*

6.52 *Policy RM5 must be read in conjunction with the Excluded Development List, please refer to paragraph 6.38 for further details.*

Policy RM5

Safeguarding Minerals Infrastructure

Existing, planned and potential minerals wharf and railhead facilities (including rail sidings) and their consequential capacity are safeguarded in order to contribute towards meeting local and regional supply for aggregates and other minerals as well as supporting modal shift in the transport of minerals. The need for railheads and minerals wharves will be monitored.

Capacity for landing, processing and handling and associated storage of minerals at wharves in Shoreham, Newhaven and Rye Ports is safeguarded. Alternative use proposals should demonstrate that there is no net loss of capacity for handling minerals within a port.

Proposals for non-minerals related uses within the vicinity of an infrastructure site should be designed to minimise the potential for conflicts of use and disturbance in accordance with the Agent of Change principle. Proposals for incompatible non-minerals development should not be permitted.

The Authorities will support the co-location of railheads and minerals wharves with processing capacity subject to it being demonstrated that this does not adversely affect space requirements for operational use.

The Authorities will periodically review and update Mineral Infrastructure Safeguarded Areas as required.

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Safeguarding facilities for concrete batching (etc.) (RM6)

Explanation

To ensure the plan remains relevant throughout the plan period, it is proposed that the list of safeguarded facilities is removed from the policy wording and is moved to the Policies Map. The policies map would be periodically reviewed and updated as necessary.

Since the 2020 consultation, the direction of the policy remains the same. The Policy wording has been amended to strengthen the wording and emphasise the limited circumstances in which permission may be granted. Reference to the agent of change principle has been added to supporting text to ensure consistency with other policies.

It is proposed that this section replaces pages 27-28 of the Waste and Minerals Sites Plan. Policy SP10 is proposed to be superseded by RM6, as drafted below.

Purpose of Policy RM6

To ensure adequate provision of minerals of the plan area by protecting infrastructure facilities from encroaching development.

6.53 *Whilst the development management of concrete batching and similar facilities are generally district and borough council planning matters, in order to provide a comprehensive safeguarding mechanism for minerals infrastructure in the Plan Area it is considered appropriate to safeguard such sites in the WMLP.*

6.54 *The NPPF requires that planning policies safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material. No such sites were received in response to the Call for Evidence and Sites consultation, and a need for additional facilities has not been identified.*

6.55 *Development proposals within the vicinity of safeguarded concrete batching, coated materials manufacture and other concrete products must be compatible with the operations at the safeguarded concrete and concrete products sites in accordance with the Agent of Change Principle and national*

Providing for Minerals 6

policy⁽²⁰⁾. *Proposals should be accompanied by a proportionate Minerals Infrastructure Assessment (MIA) comprising a compatibility assessment. Further guidance on preparing the MIA can be found within the separate guidance document on safeguarding.*

6.56 *Safeguarded concrete batching facilities are listed on the Policies Map.*

Policy RM6

Safeguarding facilities for concrete batching, coated materials manufacture and other concrete products within the Plan Area

Facilities for concrete batching, coated materials manufacture and other concrete products are safeguarded against development that would unnecessarily sterilise the facility or prejudice its use. The safeguarded facilities are identified in the Policies Map.

Proposals for non-minerals development on or near the site that would prejudice the use of the facility, or result in incompatible development, should not be permitted. Planning permission will only be granted where it is demonstrated that:

- *the proposed development is in accordance with a site allocation in an adopted local plan or neighbourhood plan;*
- *the site is no longer needed;*
- *the proposal is of a temporary nature; or,*
- *the capacity of the site can be relocated elsewhere.*

The Authorities will periodically review and update safeguarded facilities as required.

Minerals Consultation Areas (RM7)

Explanation

Based on local constraints and changes to the surroundings of safeguarded sites, it is proposed that the extents of Mineral Consultation Areas are altered dependent on the constraints of each site. These can be found in the Policies Map.

20 Paragraph 187 of the NPPF states that proposals must ensure that the new development can be integrated effectively with existing businesses and existing facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.

6 Providing for Minerals

The proposed wording of this policy would allow the MPA discretion to raise concern in cases where the minerals sites and facilities may be adversely affected by non-minerals development.

In response to representations received during the 2020 consultation, to avoid confusion, reference to MSAs has been removed from the supporting text and the exemptions list has been moved earlier in the document.

It is proposed that this section replaces Minerals Consultation Areas (SP11) on pages 28 & 29 of the WMSP.

Purpose of Policy RM7

To ensure appropriate consultation is undertaken by Local Planning Authorities on alternative development proposals.

6.57 Policies RM3 and RM5 seek to safeguard land-won minerals resources and minerals infrastructure from sterilisation and incompatible development. Minerals Consultation Areas (MCAs) are required to be defined by National Policy ⁽²¹⁾. They are a means to ensure that, in determining non-minerals development by another local planning authority within the Plan Area, account is taken of the need to safeguard such assets. Brighton & Hove City Council and the South Downs National Park Authority can achieve this consideration within their own decision taking. In the County of East Sussex outside the South Downs National Park, local planning authorities need to consult the Minerals Planning Authority on relevant applications. To ensure a manageable process, Policy RM7 below sets out how the consultation process will be implemented.

Policy RM7

Minerals Consultation Areas

Within the County of East Sussex outside the South Downs National Park, the local planning authority will consult the Minerals Planning Authority on non-minerals development affecting, or potentially affecting, existing minerals sites and facilities identified in the Policies Map. Neighbourhood planning groups will also need to consult the relevant MPA where allocating land affecting MSAs in their Neighbourhood Plan.

21 Paragraph 210 of the NPPF (2021)

Providing for Minerals 6

Types of planning applications not included within the excluded development list which fall into a Mineral Consultation Areas (MCA) will require the consultation of the Minerals Planning Authority. MCAs will be updated when necessary and included in Annual Monitoring Reports, and the local planning authorities informed accordingly.

6.58 *Minerals Consultation Areas do not apply to development considered unlikely to affect MSAs. Please see paragraph 6.38 for further details.*

7 Development Management Policies

7 Development Management Policies

7.1 The Development Management Policies section in the WMLP sets out policies to be used in the determination of waste and minerals applications covering a range of topics such as environmental enhancement, transport, design and operation.

7.2 The Authorities' monitoring indicated that these policies are broadly operating as expected, and do not require altering at this time. However, it was identified that the supporting text of Policy WMP27 was factually incorrect and requires alteration. All other policies within this section apart from WMP27, which is to be replaced by Policy RD1 below, remain unchanged.

Environment and Environmental Enhancement (RD1)

Explanation

Policy WMP27 and its supporting text seeks to conserve and enhance the environment. This is a development management policy and is intended to be a general policy that can be applied to a wide range of proposals. Several changes are being proposed to this policy and its supporting text:

1. Addition of specific reference to net gain in biodiversity

In the NPPF it is identified that plans must contribute to net gain of biodiversity. Presently, WMP 27 seeks to maximise opportunities to increase biodiversity and habitat creation. The NPPF now requires almost all development to result in net gains in biodiversity. The policy has been updated to reflect this new emphasis. The policy text has also been shortened and made more flexible by identifying environmental and historic designations as a whole, instead of listing specific designations.

2. Alteration of supporting text in relation to Habitats Regulation Assessments

The supporting text of WMP27 provides guidance in a grey box to be used when undertaking Habitats Regulations Assessments (HRA), ⁽²²⁾ which the Authorities are required to undertake at specific times set out in law. The first part of the HRA process is called screening, which identifies if further assessment is required.

22 The Conservation of Habitats and Species Regulations 2017 transposes the Habitats Directive and elements of the Birds Directive into English Law. These directives seek to protect biodiversity through the conservation of natural habitats and species of wild fauna and flora and require certain assessments to be undertaken in certain circumstances.

Development Management Policies 7

Within the guidance in the grey box the third paragraph and footnote 89 makes reference to the advice given in the Design Manual for Roads and Bridges which indicates "*that if the increases in traffic [arising from a development] will amount to less than 200 Heavy Duty Vehicles (HDV) movements per day the development can be scoped out of further assessment*".

In 2017, a High Court judgement in the case of Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] EWHC 351 (Admin) found that in following the advice of the Design Manual for Roads and Bridges by using a 200 HDV vehicle limit as a threshold for screening, Lewes District Council, when undertaking a Habitats Regulation Assessment on their Joint Core Strategy, had failed to consider the cumulative impact of the development proposed in their local plan in combination with those proposed within the Wealden Local Plan. The judgement also undermined the use of a 1% threshold to determine if a scheme may be screened out. The supporting text in the WMP, which was based on the best advice available in 2013, follows an approach similar to Lewes District Council. The Authorities are, therefore, seeking to amend the supporting text in order to update it in light of the judgement.

3. Alteration to supporting text to include reference to soils in relation to biodiversity and climate change.

The importance of the biodiversity within soils and its potential to store carbon has significantly increased in the last few years. Measures for protecting and minimising disturbance to soils should be included in an Environmental Statement. Reference to this requirement is therefore included in the supporting text.

4. Additional changes between 2020 and 2021 version

Following the consultation on the Draft Revised Policies in 2020, Policy RD1 was revised. In summary:

- The policy text has been altered to align more closely with the NPPF (2021), and now refers to the Sussex Nature Recovery Network and any future Local Nature Recovery Strategy.
- Additional supporting text to reference the NPPF and the requirements within it have been added.
- The ambiguity in the policy text referring to 'a) above' has been clarified.
- The list of designations has been moved from the Policies Map to Appendix 3 of this document.
- Reference to landscape added; this was accidentally omitted when WMP27 was first transposed.

7 Development Management Policies

7.3 It is proposed that this section replaces Environment and Environmental Enhancement (WMP27) on pages 113-116 of the WMP. Policy WMP27 Environment and Environmental Enhancement would be superseded by RD1 Environment and Environmental Enhancement.

Purpose of Policy

To conserve and enhance the built and natural environment including: natural assets; biodiversity and geodiversity; landscapes; historic environment; geology and geomorphology; Heritage assets; and landscape character.

7.4 *The Plan Area has a range of natural and built features which are recognised for their environmental and / or historic qualities, a number of which are formally recognised via international, national, or local level designations. Within the existing policy hierarchy, sites or features designated at a national or international level receive statutory protection via legislation. Others designated at a more local level carry less policy weight in decision-making, although the Authorities recognise that such features are an important part of the local environment.*

7.5 *Policy RD1 sets out the Plan's policy in respect to proposed minerals and waste development and the natural and historic environment. This policy is based on the principles set out in the NPPF. The NPPF also details information which applicants are expected to provide and contains guidance on how planning applications that affect environmental and historic sites should be determined in certain circumstances. Applicants are expected to provide the information as set out in the NPPF and the Minerals and Waste Planning Authority will follow the policy set out when determining planning applications.*

Development Management Policies 7

Policy RD1

Environment and Environmental Enhancement

To conserve and enhance the built and natural environment development should:

- a) protect and enhance designated sites, areas and features of environmental, landscape and historic importance, as listed in Appendix 2;*
- b) provide measurable net gain in biodiversity and enhancement of natural capital, as guided by the Sussex Nature Recovery Network and any future Local Nature Recovery Strategy, following the mitigation hierarchy with gain provided on site where possible, or at the best strategic location for nature's recovery; and*
- c) maximise opportunities for functional habitat creation including inter-connectivity between habitats within and outside the site.*

Permission will not be granted where:

- x) a site or area of national or international importance is adversely affected, or an appropriate assessment has concluded that the plan or project may adversely affect the integrity of the site or area, unless there are no alternative solutions and there is an imperative overriding public interest for the development, or*
- y) the development would have a significant adverse impact on such a site, area or feature as referred to in a. above.*

7.6 *Proposals are expected to assess the topics raised under this Policy within an Environmental Statement, particularly if there are known features in the vicinity of the application site. Any proposals for net gain in biodiversity to be achieved should be proportionate to the proposed development and its location in relation to the Nature Recovery Network. Applicants are expected to follow the latest biodiversity net-gain best practice when addressing this policy.*

7.7 *The importance placed on the biodiversity within soils and its potential to store carbon has significantly increased in the last few years. Both waste and minerals development can result in a large amount of soil disturbance. The Environmental Statement accompanying such proposals should therefore include details of how soil disturbance is to be minimised. Best practice examples are set out in the Defra publication 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites'.*

7 Development Management Policies

7.8 A list of different types of designated sites, priority, legally protected and notable species & habitats, (including irreplaceable habitats) are included in Appendix 2. Where there is evidence that identifies an un-designated environmental or historic site, area or feature as important, these are considered in the same way as designated sites of similar characteristics, following best practice guidance in relation to species..

7.9 When assessing significance, the appropriate tests as set out in the NPPF, where relevant, should be applied. At the time of publication, this is paragraphs 176, 180, 181 (natural environment), 194 and 197-205 (heritage assets) of the NPPF (Feb 2021).

7.10 In the cases where proposed development may affect the integrity of sites or areas that are subject to the Habitat Regulations and Appropriate Assessment, the presumption is that development should not be permitted. This follows the broad approach set out in the NPPF and the Habitats Directive, and will be appropriate for the vast majority of proposed developments. The Habitats Regulations do make an exception in instances where, subject to a number of strict requirements, there are clear imperative reasons of overriding public interest for the development. When considering the proposal due weight will be given to the approach the applicant has taken to follow the Habits Regulations, and the reasons of overriding public interest that are put forward.

7.11 Where appropriate, the Authorities will include planning conditions that provide for notification, evaluation and (if confirmed) recording of important natural or archaeological features that may be encountered and, where relevant, the retrieval of finds and placing in recognised national collections. Agreements for restoration, after-care and after-use will be flexible to allow for active conservation of any interest, as they are discovered, throughout the life of the planning permission.

8 Implementation and Monitoring

8.1 It is proposed that the implementation and monitoring table in section 7 of the Waste and Minerals Plan (pages 120-137) is updated. Entries for policies WMP4, WMP7a, WMP7b, WMP11, WMP14, WMP15 and WMP27 would be deleted and replaced with the table below.

8.2 Monitoring and reporting on the implementation of the policies in the Plan is important to establish whether they are being successful in achieving their aims. Monitoring also allows corrective action to be taken if the aims of the Plan are not being met. Performance of the policies is currently and will continue to be evaluated yearly and reported via the Local Aggregates Assessment and Annual Monitoring Report.

Policy	Delivery Body/Mechanism	Key Delivery Partners	Delivery Target (how much, when, where)	Delivery Indicator
RW1 - Sustainable Locations for Waste Development	ESCC, BHCC, SDNPA Strategic waste facilities developed in the most sustainable locations.	Waste industry Minerals industry	Strategic facilities located consistent with the approach identified in the Plan.	Locations of waste facilities consistent with policy.
WMP4	ESCC, BHCC, SDNPA Identification of locations for mineral infrastructure, processing of secondary minerals, and for recycling of mineral resources.	Minerals industry Environment Agency Landowners Port Authorities	A proportional increase in use of secondary or recycled materials in relation to total minerals used. Sufficient primary and secondary aggregates provided to the Plan Area over plan period	Data about minerals produced in the Plan Area or imported into the Plan Area.

Implementation and Monitoring 8

8 Implementation and Monitoring

<i>Policy</i>	<i>Delivery Body/Mechanism</i>	<i>Key Delivery Partners</i>	<i>Delivery Target (how much, when, where)</i>	<i>Delivery Indicator</i>
				<i>Data about C&D waste being recycled at permitted waste sites.</i>
<i>RM0 Sustainable Use of Aggregates</i>	<i>ESCC, BHCC, SDNPA, Change in construction practices</i>	<i>District/Borough Councils Development Industry</i>	<i>Sustainable use of aggregates being a considered as a design consideration in the design of all developments.</i>	<i>Policy Citation / Consideration of aggregate usage in design in random sample review of Design and Access Statement / Planning Statements</i>
<i>RM1 Provision of Aggregates</i>	<i>ESCC, BHCC, SDNPA Importation of aggregates by sea, rail, and road. Provision of recycled and secondary aggregates for use in the Plan Area</i>	<i>Minerals industry CDEW industry Environment Agency Landowners Port Authorities</i>	<i>Sufficient primary and recycled/secondary aggregates provided to the Plan Area over plan period.</i>	<i>Data on imports of aggregates to the Plan Area. Consumption of aggregates in the Plan area.</i>

Implementation and Monitoring 8

Policy	Delivery Body/Mechanism	Key Delivery Partners	Delivery Target (how much, when, where)	Delivery Indicator
		MMO Crown Estate		Data about C&D waste being recycled at permitted waste sites.
RM2 - Provision for an additional extraction area at Aldershaw Farm	Policy RM2 is monitored under the arrangements for WMP13 Provision of Clay.			
RM3 - Safeguarding Mineral Resources RM4 - Prior Extraction of Minerals Resources	ESCC, BHCC, SDNPA Safeguarding of land-won resources and identifying consultation areas. Development industry to undertake prior extraction of minerals where feasible. Review Minerals Resource Assessments.	District/Borough councils. Minerals industry Environment Agency Natural England Development industry	No viable resources sterilised.	Number of applications for built development on safeguarded or consultation areas. Tonnage figures of prior extracted resources. Review of Minerals Resource Assessments and number of applications for prior extraction proposals

8 Implementation and Monitoring

Policy	Delivery Body/Mechanism	Key Delivery Partners	Delivery Target (how much, when, where)	Delivery Indicator
RM5 - Safeguarding Minerals Infrastructure	ESCC & BHCC Identify and safeguard sites and capacities at wharves and railheads. Review Minerals Infrastructure Assessments.	District/Borough councils and regeneration area partners Port Authorities Minerals industry Waste industry Network Rail	No net loss of wharf/rail capacity in the Plan Area.	Annual monitoring of wharf status (active or redundant) and existing rail sidings/tracks. Number of applications for built development on safeguarded wharves/rail sidings. Review of Minerals Resource Assessments and number of applications for prior extraction proposals
RM6 - Safeguarding Facilities for Concrete Batching	ESCC, BHCC, SDNPA and relevant districts & boroughs. Identify and safeguard sites. Implement consultation areas.	District & Borough Councils. Aggregates manufacturing industry.	No net loss of concrete batching facilities. Proposals should be compatible with batching plants.	Ongoing monitoring through the consultation process.

Implementation and Monitoring 8

Policy	Delivery Body/Mechanism	Key Delivery Partners	Delivery Target (how much, when, where)	Delivery Indicator
RD1 - Environment and Environmental Enhancement	ESCC, BHCC, SDNPA	Waste/minerals industry	Proposals should minimise environmental impacts where possible and mitigate where necessary.	Ongoing monitoring of conditions on waste developments.
	Industry to address environmental protection in proposals.	Environment Agency	Overall maintenance, and where possible enhancement, of environmental assets in the Plan Area.	Enforcement cases or complaints about environmental assets related to waste/minerals developments.
		Natural England		Proposals resulting in net gain.

9 Summary of Proposed Amendments

9 Summary of Proposed Amendments

Document - Section [Page numbers]	Proposed Amendment(s)	Reason(s) for Review
WMP - Overarching Strategy: Local Strategy Statement - Approach to Key 'Larger than Local' Matters [p25-32]	The section Local Strategy Statement - Approach to Key 'Larger than Local' Matters is deleted .	Factual update.
WMP Minerals and Waste Development in the South Downs National Park (WMP2)	Replaced by RPD - Minerals and Waste Development affecting the South Downs National Park and High Weald Area of Outstanding Natural Beauty (RV1) [p15-18]	Clarification of policy and factual update.
WMP - Sustainable Locations for Waste Development (WMP7a, 7b) [p59-62]	Replaced by RPD - Sustainable Locations for Waste Development Policy (RW1) [p19-22]	To clarify an ambiguity in the existing policy requirements.
	New Policy RPD - Sustainable Use of Aggregates (RM0) [p23-24]	New policy introduced to ensure sustainable use of aggregate.
WMP - Provision of Aggregates (WMP11) [p78-81]	Replaced by RPD - Provision of Aggregates (RM1) [p25-32]	To reassess the approach to aggregates provision in the context of depleting permitted land-won reserves in the Plan Area. Following consideration of reasonable alternatives, the new approach does not allocate any additional sites, but will rely on imported material and recycled aggregate.
WMP - Provision of Clay (WMP13) [p84-85]	Additional Policy added RPD - Provision for additional extraction area at Aldershaw Farm (RM2) [p32-35]	To support area of additional clay extraction area for clay extraction at the existing Aldershaw Quarry in response to a submission to the 'call for sites'.
WMSP - Section 4 Providing for Minerals paragraphs 4.1 to 4.6 [p24]	WMSP - Section 4 Providing for Minerals paragraphs 4.1 to 4.6 [p24] are deleted .	Factual update to reflect proposed amendments.

Summary of Proposed Amendments 9

Document - Section [Page numbers]	Proposed Amendment(s)	Reason(s) for Review
WMP - Safeguarding Minerals Resources (WMP14) [p86-88] WMSP - Safeguarding Minerals Resources (paragraphs 4.1-4.23) and Policy SP8 Minerals Safeguarding Areas for land won minerals resources within the Plan Area [p24-25]	Replaced by RPD - Safeguarding Minerals Resources (RM3) [p35-31]	To consolidate the policy requirements into a single policy for added clarity.
	New Policy RPD - Prior Extraction of Minerals (RM4) [p32-40]	New policy requirement to require extraction of mineral resources prior to alternative development proposals commencing within Minerals Safeguarding Areas in some circumstances
WMP - Safeguarding Railheads and Wharves (WMP15) [p89-90] WMSP - Safeguarding Wharves, Railheads and Concrete Batching: Wharves and Railheads (paragraphs 4.12-4.19) and Policy SP9 Safeguarding wharves and railheads within the Plan Area, Sand [p26-27]	Replaced by RPD - Safeguarding Wharves and Railheads (RM5) [p40-44]	To incorporate reference to the 'agent of change' principle introduced in the revised National Planning Policy Framework
WMSP - Safeguarding Wharves, Railheads and Concrete Batching: Concrete Batching Plants (paragraphs 4.20-4.21) and Policy SP10 Safeguarding facilities for concrete batching, coated	Replaced by RPD - Safeguarding facilities for concrete batching, coated materials manufacture and other concrete products with the Plan Area (RM6) [p44-54]	To remove the list of safeguarded facilities from the policy wording and instead illustrate on the Policies Map, to enable easier updating.

9 Summary of Proposed Amendments

Document - Section [Page numbers]	Proposed Amendment(s)	Reason(s) for Review
minerals manufacture and other concrete products within the Plan Area		
WMSP - Minerals Consultation Areas (paragraphs 4.22-4.23) and Policy SP11 Minerals Consultation Areas [p28-29]	Replaced by RPD - Minerals Consultation Areas (RM7) [p46-47]	To revise the extents of Mineral Consultation Areas to take into account the constraints of each site.
WMP - Environment and Environmental Enhancement (WMP27) [p##-##]	Replaced by RPD - Environment and Environmental Enhancement (RD1) [p48-52]	<ol style="list-style-type: none"> 1. To add a requirement for a net gain in biodiversity. 2. To update the policy requirements to take into account the judgement in Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] 3. Factual update to incorporate reference to soils conservation

Table 1

Maps 10

10 Maps

10.1 Location of Waste Management Facilities Map

Locations of Existing Permitted Waste Management Sites Within the Plan Area

- Construction & Demolition Recycling Facility
- Composting Facility
- Energy Recovery Facility
- Metal/End of Life Vehicle Facility
- Other Facility
- Recycling/Transfer Facility
- South Downs National Park
- Urban Areas

Waste Throughput (tonnes per annum)

- Up to 25,000 tpa
- 25,000-100,000 tpa
- Over 100,000 tpa

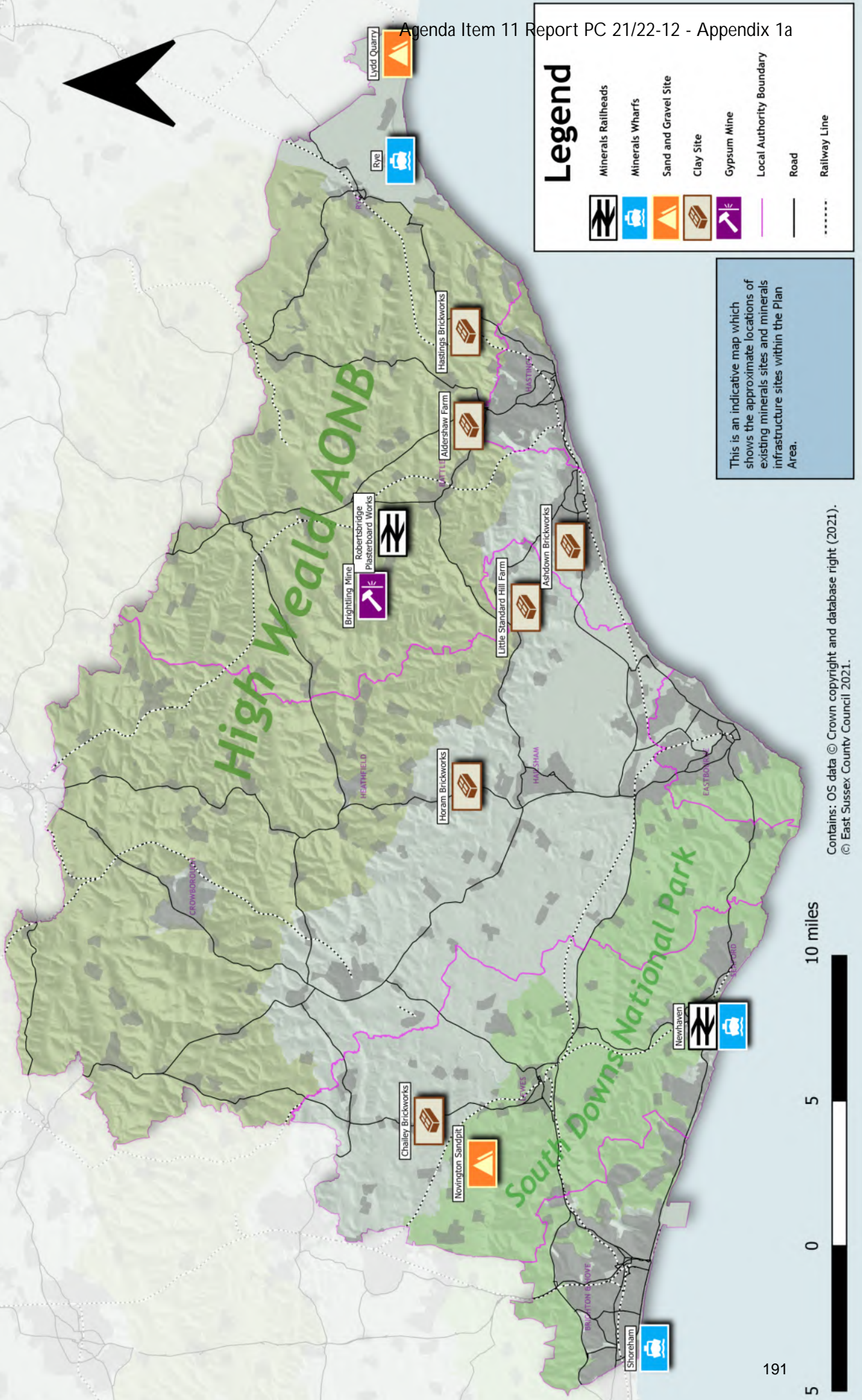
This is an indicative map showing approximate locations of different types of waste management facilities within the Plan Area. 'Other Facility' refers to facilities that do not fall into the main classifications, including specialist oil and plasterboard treatment and leachate tanks. This map does not show wastewater treatment facilities.

Map contains OS data © Crown copyright and database right (2021).

Maps 10

10.2 Minerals Sites and Infrastructure Map

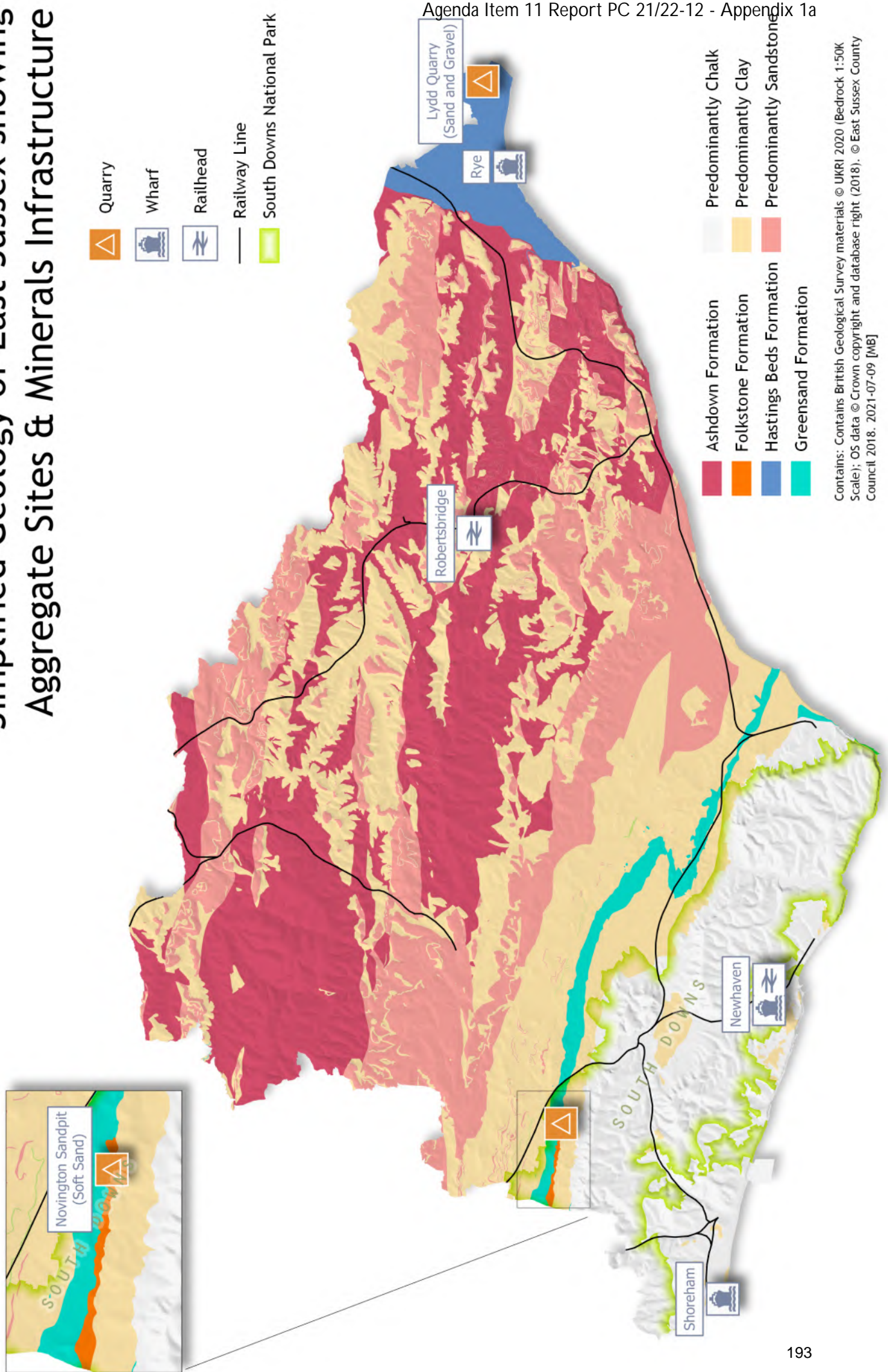
Locations of Existing Minerals Sites and Infrastructure Within the Plan Area



Maps 10

10.3 Simplified Geology Map

Simplified Geology of East Sussex showing Aggregate Sites & Minerals Infrastructure



List of Designated Sites, Areas and Features (RD1) 11

11 List of Designated Sites, Areas and Features (RD1)

Historic

- Scheduled Monuments
- Registered Parks and Gardens
- Registered Battlefields
- Designated Wreck Sites
- Listed Buildings
- Conservation Areas

Environmental

- Areas of Outstanding Natural Beauty (AONB)
- South Downs National Park
- Special Areas of Conservation
- Special Protection Areas
- Ramsar Site
- National Nature Reserves
- Sites of Special Scientific Interest
- Ancient Woodlands
- Marine Conservation Zones
- High Quality Agricultural Land
- [UK BAP Priority Habitats \(JNCC - Adviser to Government on Nature Conservation\)](#)
- The habitats of [Section 41 Species](#) (naturalengland.org.uk)
- Local Nature Reserves
- Local Wildlife Sites
- Biodiversity Net-Gain Sites

Landscape

- [East Sussex Landscape Character Areas](#)

12 Glossary

12 Glossary

Annual Monitoring Report (AMR) - a yearly report produced by the Authorities which monitors the effectiveness of the Local Plan and its policies.

Area of Focus - broad locations that are considered suitable, in principle, for the development of waste recycling and recovery facilities as defined in paragraph 5.7 of this document.

Area of Outstanding Natural Beauty (AONB) - area with a statutory national landscape designation, the primary purpose of which is to conserve and enhance natural beauty.

Call for Evidence and Sites (CfES) - a public consultation event where a council or authority asks for landowners, developers or any other interested parties to submit a site to be considered for inclusion in a Local Plan.

Commercial and Industrial Waste (C&I) - waste produced by business and commerce, which includes waste from restaurants, offices, retail and wholesale businesses, and manufacturing industries.

Construction, Demolition and Excavation waste (CDEW) - Waste arising from the construction and demolition of buildings and infrastructure. Materials arising in each of the three streams (i.e. Construction; Demolition; Excavation) are substantially different: construction waste being composed of mixed non inert materials e.g. timber off cuts, plasterboard, metal banding, plastic packaging; demolition waste being primarily hard materials with some non inert content e.g. bricks, mortar, reinforced concrete; and excavation waste being almost solely soft inert material e.g. soil and stones.

Energy Recovery - covers a number of established and emerging technologies, though most energy recovery is through incineration technologies. Many wastes are combustible, with relatively high calorific values - this energy can be recovered through processes such as incineration with electricity generation, gasification or pyrolysis.

Incinerator Bottom Ash (IBA) - a burnt residue produced as a by-product of burning of waste at high temperatures under controlled conditions.

Local Aggregate Assessment (LAA) - a yearly monitoring report required by the NPPF in which the Minerals Planning Authority forecast and assess the aggregates produced, imported and used within the Plan Area.

Local Authority Collected Waste (LACW) - formally known as Municipal Solid Waste (MSW), is waste that is collected by a waste collection authority. The majority is household waste, but LACW waste also includes waste from municipal parks and gardens, beach cleansing, cleared fly-tipped materials and some commercial waste.

Glossary 12

Marine Dredged Aggregates (MDA) - aggregates sourced by dredging from the sea bed.

Marine-Borne Material - minerals including aggregates transported and imported by sea, which may be either dredged from the sea bed or transported from other areas.

Materials Recovery Facility - facility which receives and sorts recyclable materials for processing.

Mineral Consultation Areas - areas of where district and borough planning authorities should notify the County Council if applications for development come forward. This should prevent mineral resource being lost ('sterilised') or minerals infrastructure being adversely affected.

Minerals Infrastructure - sites and facilities required for the landing, importation, storing, handling, sorting, processing and transportation of both land-won and marine-borne minerals.

Minerals Infrastructure Assessment - a document to assess whether the proposed development is likely to have an adverse effect on the infrastructure facility including its capacity. For further information see Minerals Product Association / Planning Officers Society guidance.

Minerals Resource Assessment - an assessment to provide sufficient information to enable the Minerals Planning Authority and Local Planning Authority to consider the potential effect of non-exempt development in MSAs/MCAs on safeguarded minerals resources, and the viability of prior extraction of mineral ahead or in conjunction with the non-mineral development. For further information see Minerals Product Association / Planning Officers Society guidance.

Mineral Safeguarding Areas - areas of known mineral resource that are of local or national importance (such as building stones) to warrant protection for the future.

Minerals Planning Authority (MPA) - the planning authority responsible for planning control of minerals development.

Mitigation - actions to prevent, avoid, or minimise the actual or potential adverse effects of a development, plan, or policy.

Non-inert Waste - Waste that is potentially biodegradable or may undergo any significant physical, chemical or biological change when deposited at a landfill site. Sometimes referred to as 'non-hazardous waste'.

Plan Area - The geographical area covered by this Plan. This encompasses the historic County of East Sussex, i.e. East Sussex, Brighton & Hove and the area of the South Downs National Park within East Sussex and Brighton & Hove.

Primary Aggregates - naturally-occurring mineral deposits that are used for the first time.

12 Glossary

Recovery - 'Recovery' refers to waste treatment processes such as anaerobic digestion, energy recovery via direct combustion, gasification, pyrolysis or other technologies. These processes can recover value from waste, for instance by recovering energy or compost, in addition they can reduce the mass of the waste and stabilise it prior to disposal. The definition of recovery set out in the EU Waste Framework Directive applies which states: " 'recovery' means any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy."

Recycled Aggregates - are derived from reprocessing waste arisings from construction and demolition activities (concrete, bricks, tiles), highway maintenance (asphalt planings), excavation and utility operations. Examples include recycled concrete from construction and demolition waste material, spent rail ballast, and recycled asphalt.

Recycling - the processing of waste materials into new products to prevent waste of potentially useful resources. This activity can include the physical sorting of waste which involves separating out certain materials from mixed waste.

Restoration - methods by which the land is returned to a condition suitable for an agreed after-use following the completion of waste or minerals operations.

Secondary Aggregates - recycled material that can be used in place of primary aggregates. Usually a by-product of other industrial processes. Examples include blast furnace slag, steel slag, pulverised-fuel ash (PFA), incinerator bottom ash, furnace bottom ash, recycled glass, slate aggregate, china clay sand, colliery spoil.

Sustainability Appraisal - a tool for appraising policies to ensure they reflect sustainable development objectives. The Planning and Compulsory Purchase Act 2004 requires a sustainability appraisal to be undertaken for all development plan documents.

Sustainable Development - in the broadest sense, sustainable development is about ensuring well-being and quality of life for everyone, now and for generations to come, by meeting social and environmental as well as economic needs.

Transfer Facility - facility where waste is bulked up before being transported to another facility for further processing.

Waste and Minerals Local Plan (WMLP) - term used to describe the suite of Plan Documents and other items prepared by the Authorities, that outline the planning strategy for waste and minerals for the Plan Area.

Glossary 12

Waste and Minerals Plan (WMP) - the plan that sets out the long-term spatial vision for the area and the strategic policies to deliver that vision.

Waste and Minerals Sites Plan (WMSP) - the plan that details specific sites where waste and minerals development is preferred.

Abbreviations

AMR	Annual Monitoring Report
AONB	Area of Outstanding Natural Beauty
BAP	Biodiversity Action Plan
CDEW	Construction, Demolition and Excavation Waste
CfES	Call for Evidence and Sites
C&I	Commercial & Industrial Waste
DtC	Duty to Cooperate
DSG	Desulphogypsum
LAA	Local Aggregate Assessment
LACW	Local Authority Collected Waste
MCA	Mineral Consultation Area
MDA	Marine Dredged Aggregate
MIA	Minerals Infrastructure Assessment
MMO	Marine Management Organisation
MPA	Minerals Planning Authority
MRA	Minerals Resource Assessment
MSA	Mineral Safeguarding Area
NPPF	National Planning Policy Framework
RPD	Revised Policies Document
SA	Sustainability Appraisal

12 Glossary

SAC	Special Area of Conservation
SDNP	South Downs National Park
SDNPA	South Downs National Park Authority
SoCG	Statement of Common Ground
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
WMP	Waste and Minerals Plan
WMLP	Waste and Minerals Local Plan
WMSP	Waste and Minerals Site Plan

Table 1

References 13

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Adopted:

Published: August 2021

Version: 202107-0000

ISBN: TBC

Acronyms

East Sussex County Council: ESCC

South Downs National Park Authority: SDNPA

Brighton & Hove City Council: BHCC

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

Waste and Minerals Local Plan Review Draft Local Policies Map

August 2021

The Updated Local Policies Map should be ready for the 25 August. This placeholder version is missing the Aldershaw Tiles Map (which is now only safeguarded and not allocated) and there are a number of minor alterations yet to be applied.

Preamble & Copyright

Version: 2.XX

Date: 20 August 2021

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Inset Map Legend

Allocations



Allocation (see map for policy)

Allocations are considered to be safeguarded under RM3, RM5, WMP6 and / or SP6 as applicable).

Safeguarded Sites



Minerals Site (RM3)



Minerals Site Access (Private Track) (RM3)



Minerals Facility (RM5)



Wharf / Railhead (RM5)



Concrete Batching etc. Plant (RM6)



Waste Site (WMP6 & SP6)



Minerals Site and Waste Management Facility (RM3, WMP6 & SP6)



Minerals Facility including Concrete Batching etc. (RM5 & RM6)



Waste Management Facility including Concrete Batching etc. (WMP6, SP6 & RM6)



Minerals Facility and Waste Management Facility (RM5, WMP6 & SP6)

Safeguarded Resources



Safeguarded Soft Sand Resource (RM3)

Consultation Areas



Minerals Consultation Area (RM7)

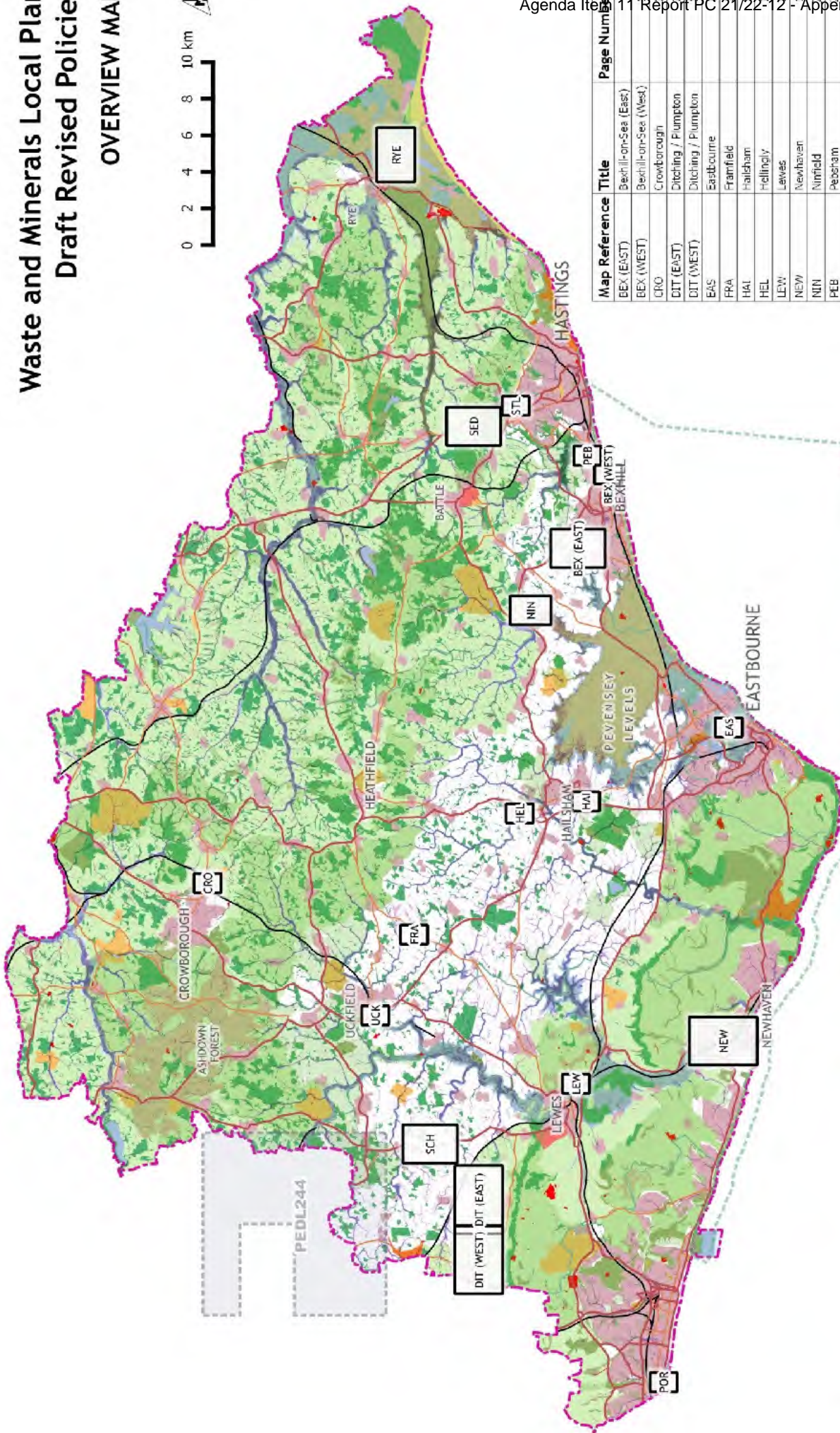


Waste Consultation Area (SP7)

Amendments to the Waste and Minerals Local Plan Policies Map

On adoption of the Revised Policies Document it is proposed that the following amendments to the Local Plan Policies Map will be made:

Waste and Minerals Local Plan
Draft Revised Policies
OVERVIEW MAP



- WMSP Inset Map Boxes
- Plan Area
- Petroleum Exploration Development Licence Area
- Marine Conservation Zone
- Historic Battlefield
- Historic Parks and Gardens
- Country Parks
- Scheduled Monument
- EA Floodzone 2
- EA Floodzone 3
- Environmental Designation - Local
- Environmental Designation - National
- Environmental Designation - International
- National Park and AONB

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BEX (EAST)	Bexhill-on-Sea (East)	11
BEX (WEST)	Bexhill-on-Sea (West)	12
CRO	Crowborough	13
DIT (EAST)	Ditching / Plumpton	14
DIT (WEST)	Ditching / Plumpton	15
EAS	Eastbourne	16
FRA	Framfield	17
HAL	Hailsham	18
HEL	Hellingly	19
LEW	Lewes	20
NEW	Newhaven	21
NIN	Nimfield	22
PEB	Peabham	23
POR	Portlady	24
RYE	Rye	25
SCH	South Chailey	26
SED	Sedlescombe	27
STL	St Leonards-on-Sea	28
UCK	Uckfield	29

Allocations

The Revised Policies document proposes the following additional allocation:

Map Reference	Locality	Title	Admin #	LPM Page
Extension to Clay Quarry (RM2)				
SED	Sedlescombe	Pokehold Wood, Kent Street (Aldershaw Handmade Tiles Ltd)	M/ALD	26

Amended Safeguarded Sites & Resources

The East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan safeguards: Minerals Resources & Minerals Sites; Minerals Infrastructure (Wharves and Railheads); Concrete Batching Plants etc.; and Waste Sites. **The following locations are proposed to be safeguarded in addition to those already safeguarded as depicted in the Waste and Minerals Sites Plan.** The sites / areas below are depicted together on the following maps which are organised by approximate locality.

Safeguarded Minerals Resources & Minerals Sites (RM3)

Map Reference	Locality	Title	Admin #	LPM Page
DIT (EAST)/ DIT (WEST)	Ditchling / Plumpton	Soft Sand Reserve	MSA/DIT (SAND)	14/15
		Stanton's Farm & Novington Sandpit	MSA/DIT [STA]	14
NIN	Ninfield	A259 (Little Standard Hill Farm)		22

Safeguarded Minerals Infrastructure (Wharves & Railheads) (RM5)

Map Reference	Locality	Title	Admin #	LPM Page
NEW	Newhaven	East Quay	R-RSA/NEW [EQ]	21
RYE	Rye	ARC Wharf	R-RSA/RYE [ARC]	25
		Rastrum's Wharf	R-RSA/RYE [RAS]	25

Safeguarded Concrete Batching Plants etc. (RM6)

The following concrete batching plants were safeguarded with the adoption of the Waste and Minerals Sites Plan, but owing to an omission the maps were omitted from the policies map at the time.

Map Reference	Locality	Title	Admin #	LPM Page
BEX (WEST)	Bexhill-on-Sea	Brett Drive, Brett Concrete Works - Unit 1	E112	12
CRO	Crowborough	Jarvis Brook, (Coppard Plant Hire Ltd)	E142	13

EAS	Eastbourne	Hammonds Drive (Cemex)	E143	16
HAI	Hailsham	Diplocks Way (Hanson Premix)	E144	18
HEL	Hellingly	North Street, Broad Farm (The Granary Rural Business Centre)	E106	19
NEW	Newhaven	North Quay (Newhaven Roadstone Ltd (East))	E145	21
NIN	Ninfield	A269 (Tarmac Topblock (Ninfield Concrete Plant))	E147	22
RYE	Rye	Harbour Road, Rye Wharf / Saltings	E148	25
STL	St Leonards-on-Sea	Sedlescombe Road North (Hanson Concrete)	E149	28
UCK	Uckfield	Bellbrook Industrial Estate, Unit 19	E082	29

Safeguarded Waste Sites (WMP6 & SP6)

Map Reference	Locality	Title	Reason for Safeguarding				#	LPM Page
			HWRC	Recycled Aggregate Site	Strategic Waste Site	Specialist Site / Other Reason		
BEX (EAST)	Bexhill-on-Sea	Turkey Road, Ashdown Brickworks		●			E155	11
FRA	Framfield	Framfield - Squires Farn Ind. Estate, Knights Business Centre - Unit 8			●		E120	17
LEW	Lewes	Cliffe Ind. Estate - Unit 18			●		E081	20
NEW	Newhaven	Avis Way / New Road Ind. Estate - Newhaven HWRC	●				E125	21
		Avis Way / New Road Ind. Estate - Titan Works (Greenacre)			●		E124	21
		Beach Road, Endeavour Works - Unit G			●		E109	21
		Newhaven Port, 4A Fisher Terminal, East Quay				●	E151	21
		North Quay (Kingston Transport (Newhaven))		●	●		E097	21
		North Quay (Newhaven Roadstone Ltd (West))		●	●		E102	21
		North Quay, Newhaven ERF Rail Transfer		●	●		E095	21
		North Quay, Newhaven Energy Recovery Facility (ERF)			●		E063	21
		North Quay, Old Timber Yard, The			●		E013	21
		North Quay, Southerham Wharf			●		E076	21
PEB	Pebsham	Freshfields, Pebsham HWRC	●		●		E067	23
		Freshfields, Pebsham Landfill Leachate Tanks			●		E130	23
		Freshfields, Pebsham WTS			●	●	E069	23
POR	Portslade-by-Sea	Ferry Wharf		●			E140	24
RYE	Rye	Harbour Road (Rye Oil Ltd)				●	E073	25
		Harbour Road, Rye Wharf / Saltings		●			E148	25
SCH	South Chailey	A275, Chailey Brickworks		●			E154	26

Maps

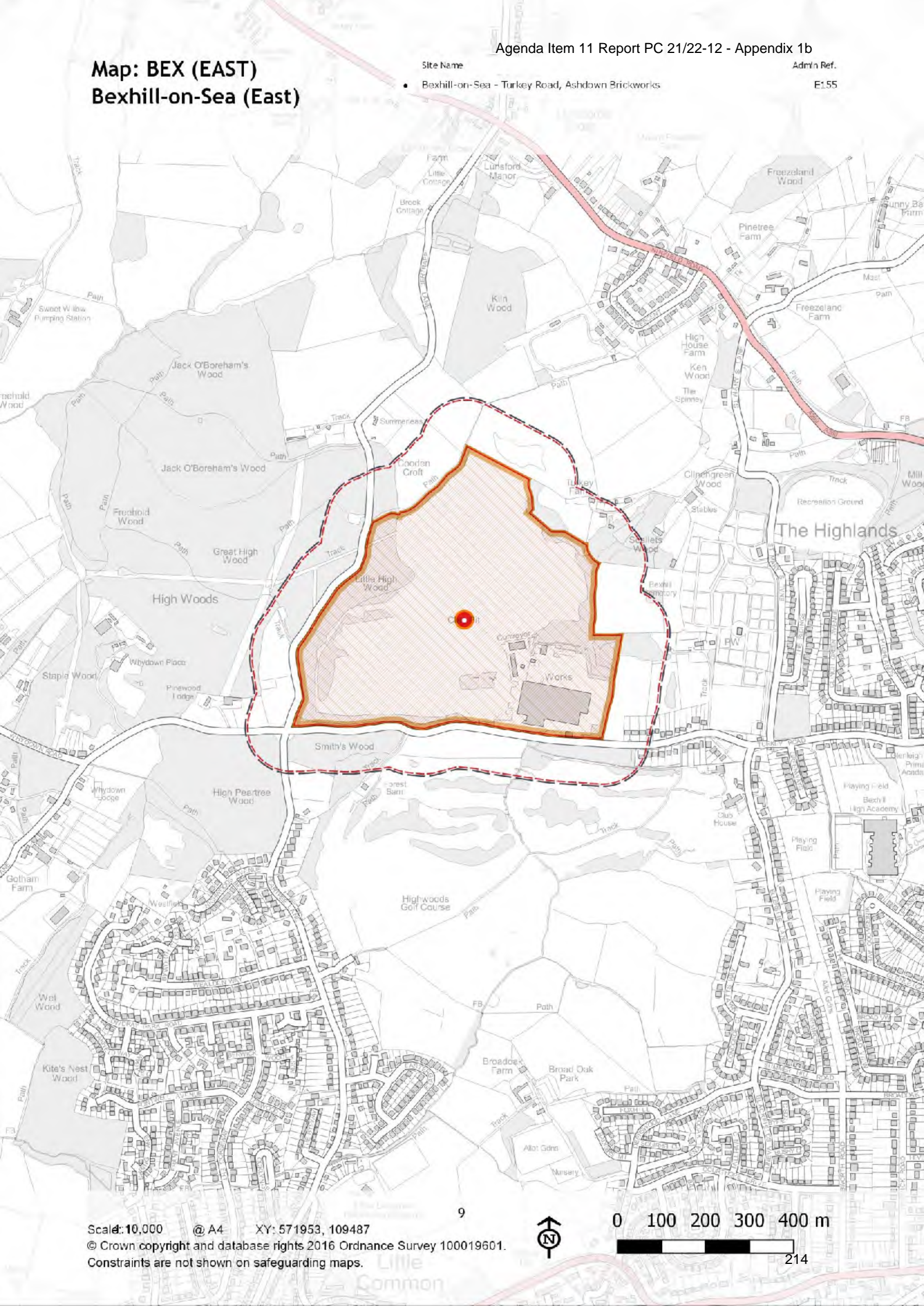
Map: BEX (EAST) Bexhill-on-Sea (East)

Site Name

Admin Ref.

- Bexhill-on-Sea - Turkey Road, Ashdown Brickworks

E155



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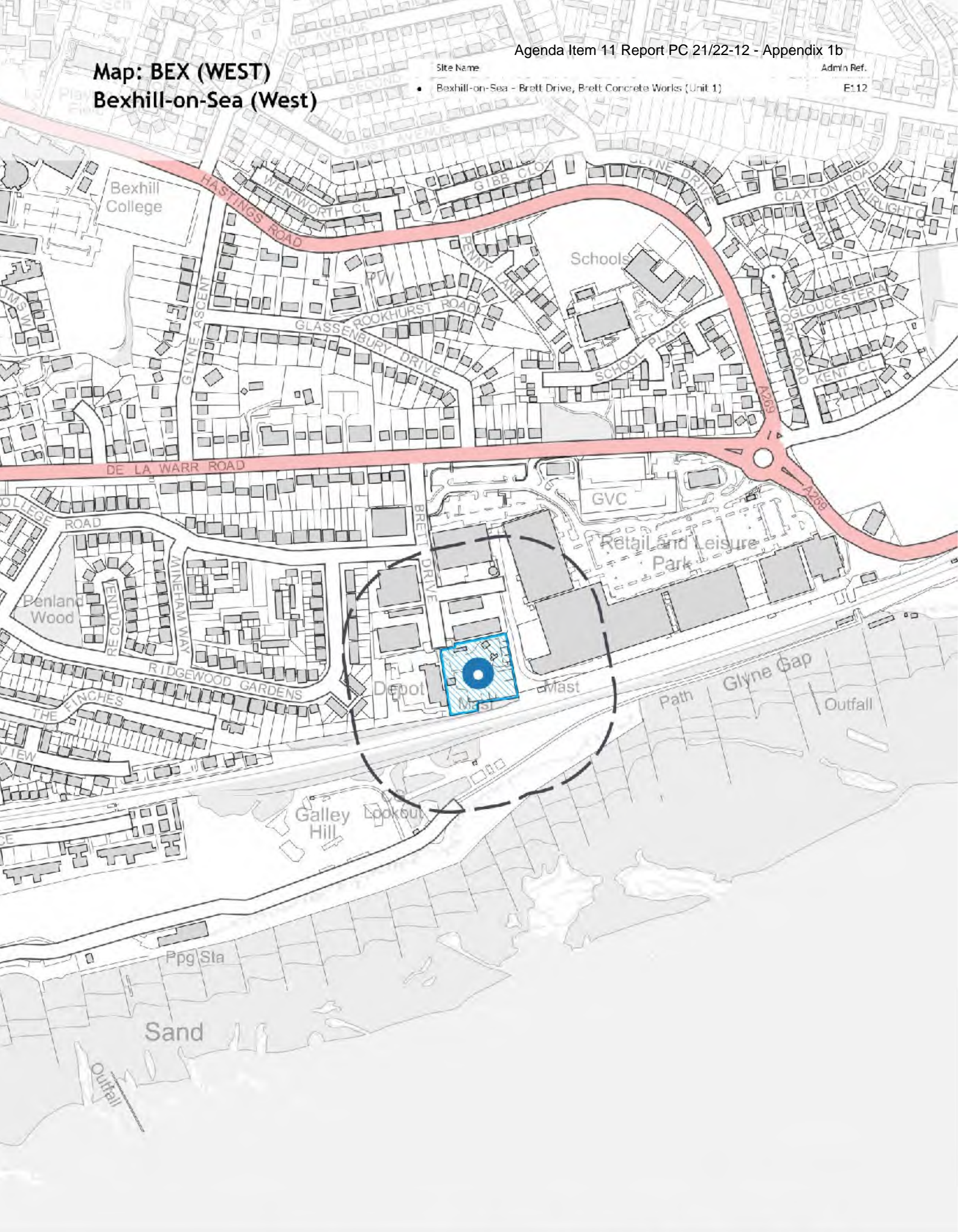
Map: BEX (WEST) Bexhill-on-Sea (West)

Site Name

Admin Ref.

- Bexhill-on-Sea - Brett Drive, Brett Concrete Works (Unit 1)

E112



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10



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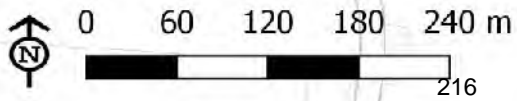
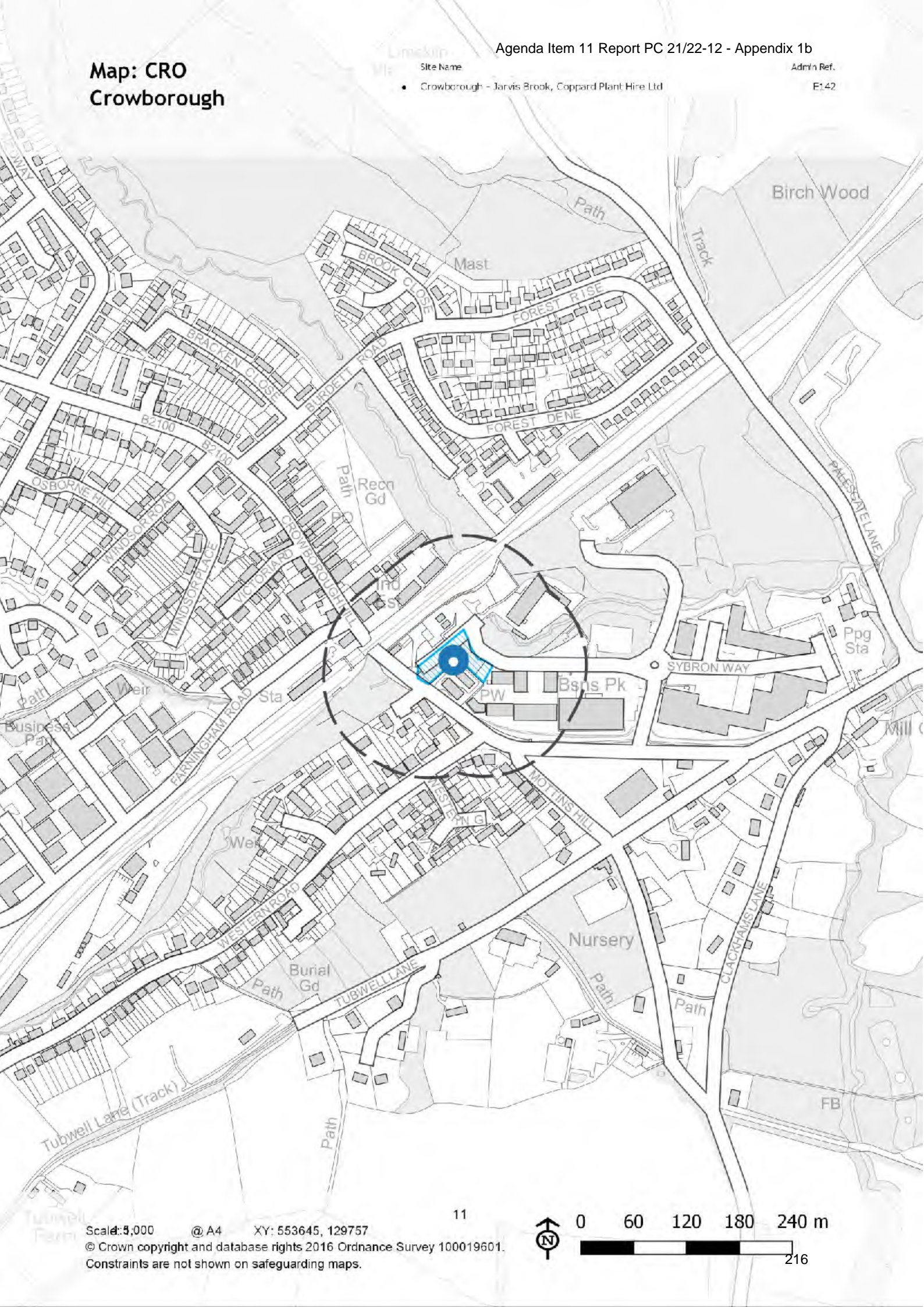


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Map: CRO
Crowborough

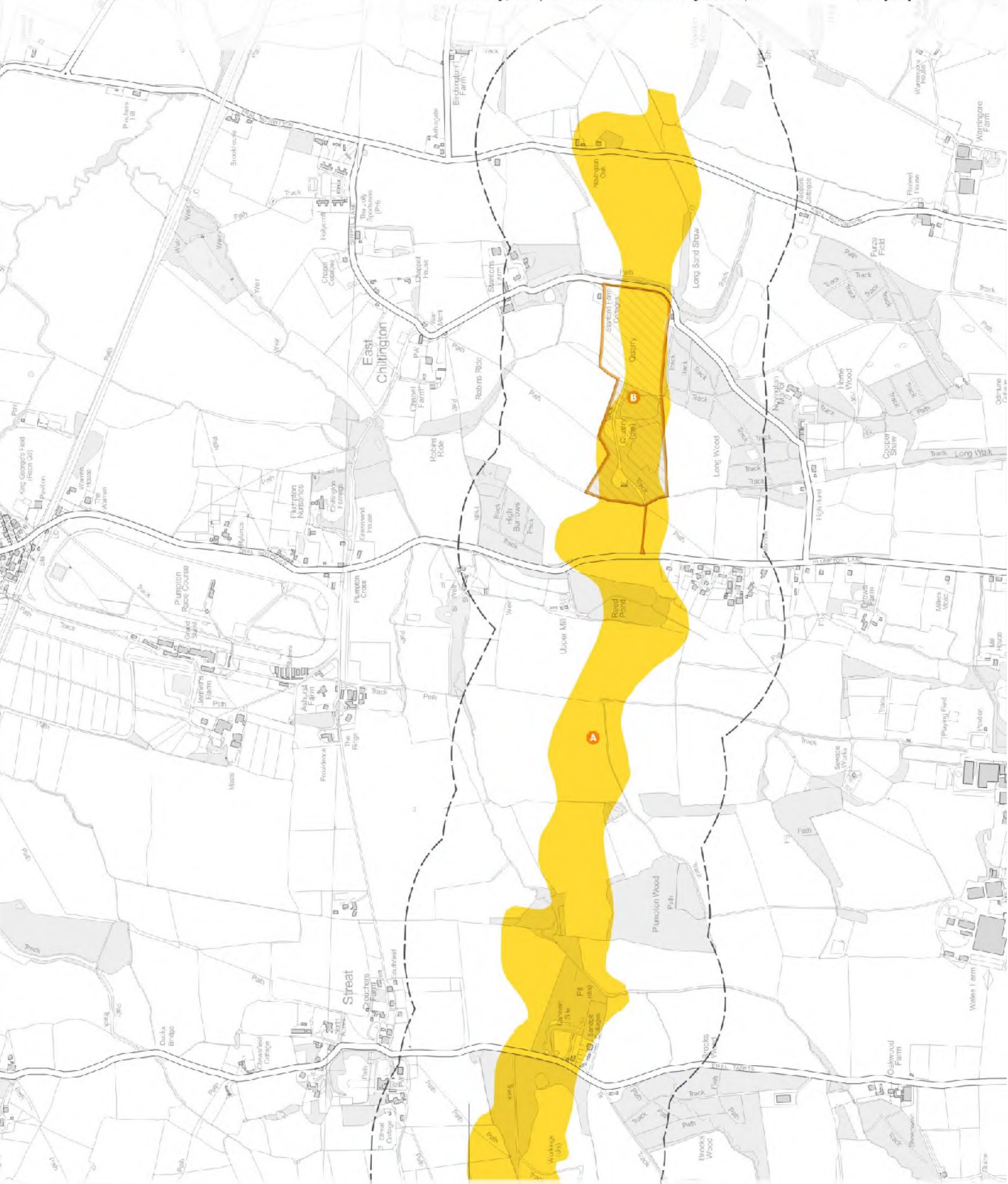
Site Name
• Crowborough - Jarvis Brook, Coppard Plant Hire Ltd

Admin Ref.
E142



Map: DIT (EAST)
Ditchling / Plumpton

Site Name	Admin Ref.
A Ditchling / Plumpton - Soft Sand Reserve	DIT (SAND)
B Ditchling / Plumpton - Stanton's Farm & Novington Sandpit	VDIT [STA]



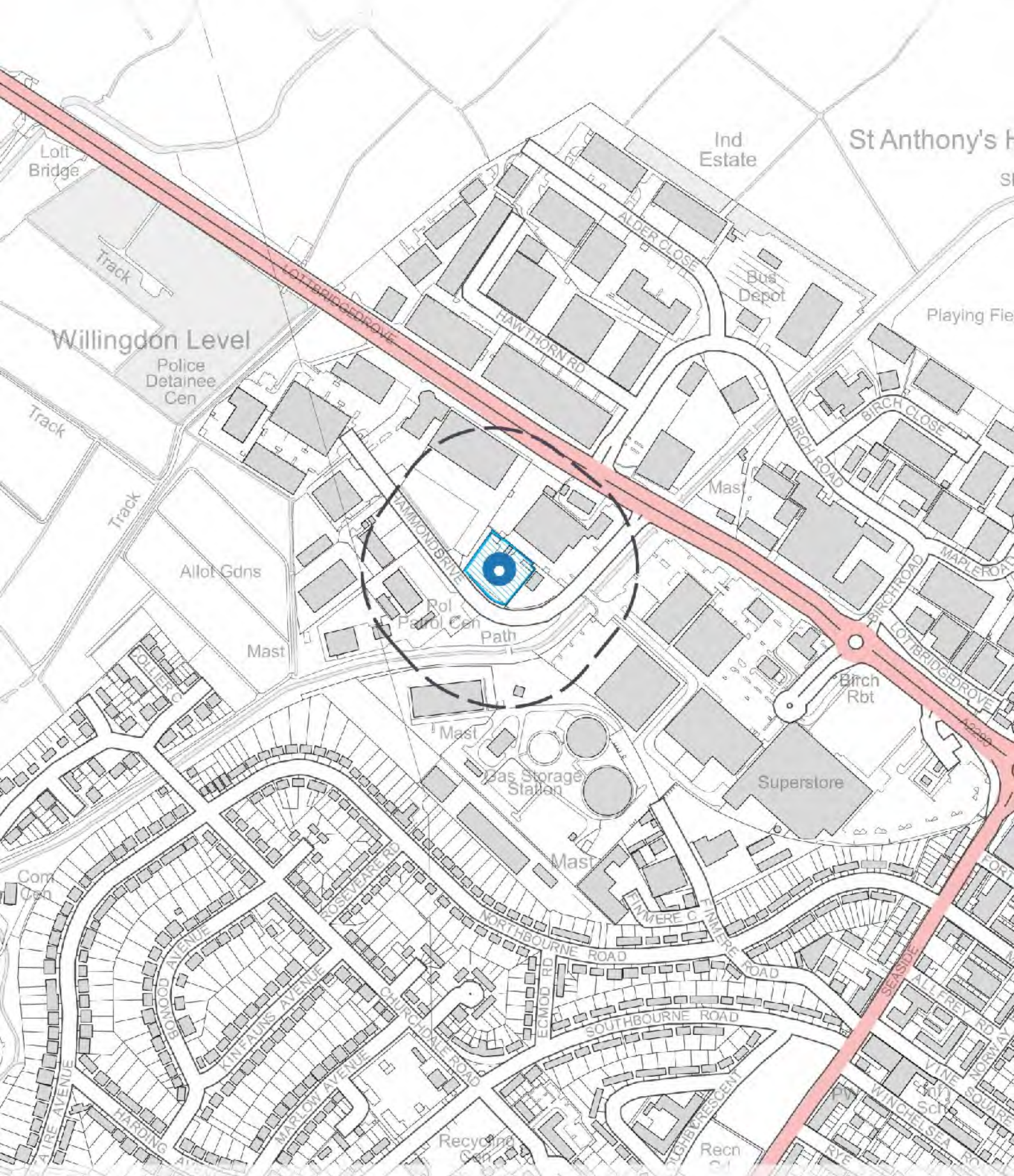
- Ditchling / Plumpton - Soft Sand Reserve

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Map: EAS
Eastbourne

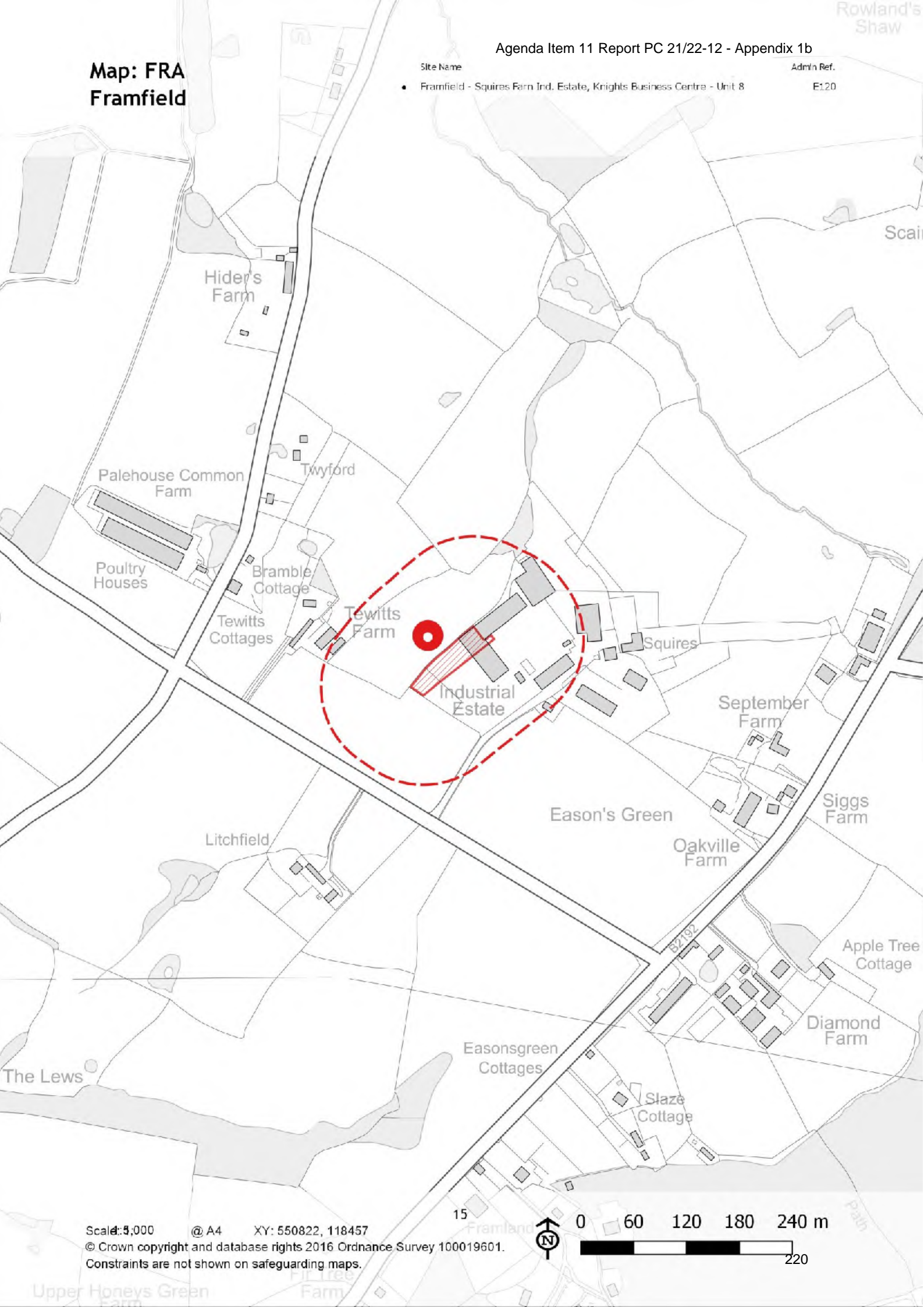
Site Name
• Eastbourne - Hammonds Drive, Cemex

Admin Ref.
E143



Map: FRA Framfield

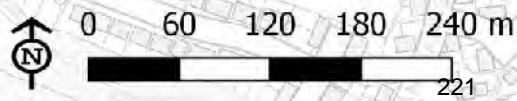
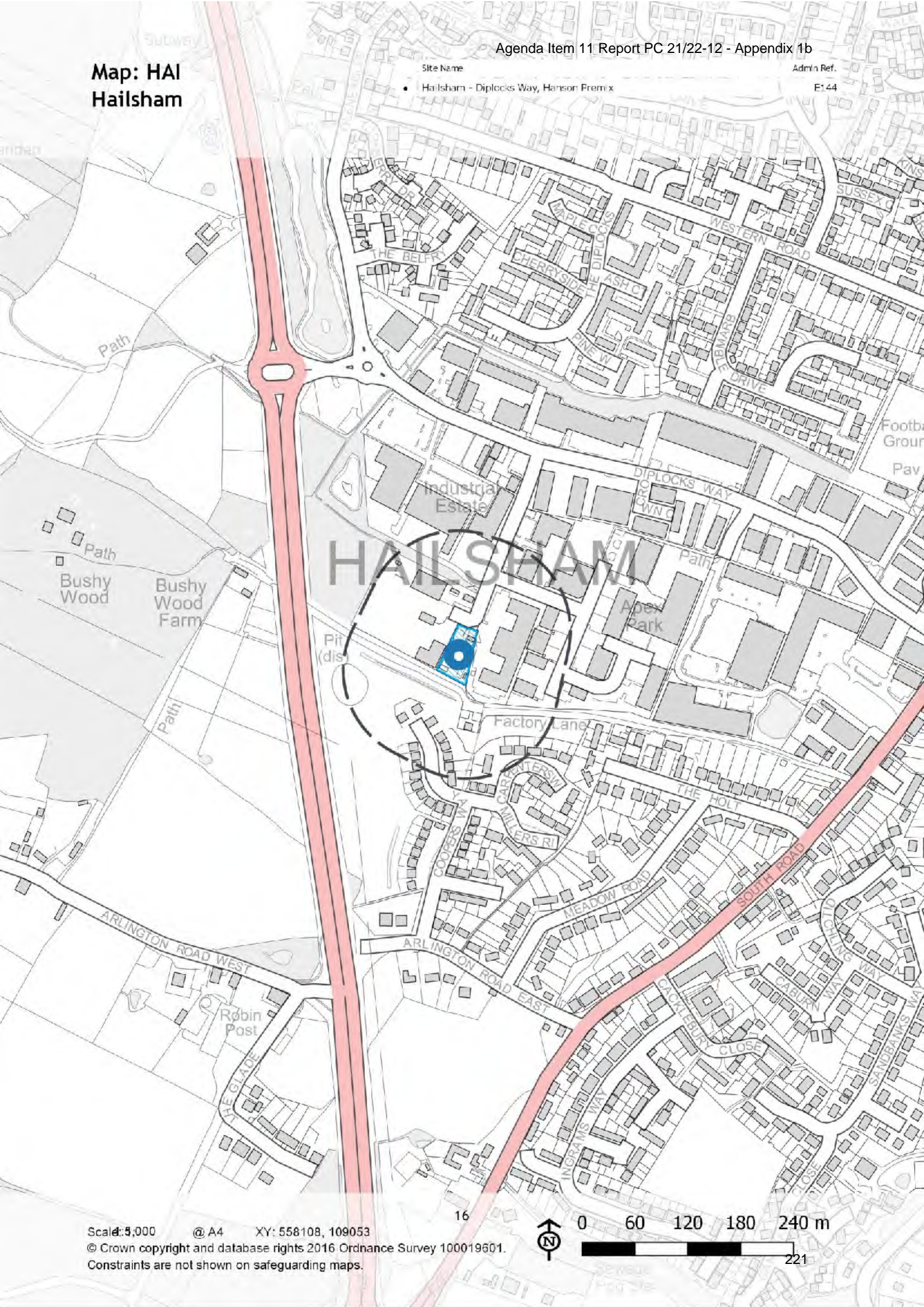
Site Name	Admin Ref.
<ul style="list-style-type: none"> Framfield - Squires Farm Ind. Estate, Knights Business Centre - Unit 8 	E120



Map: HAI
Hailsham

- Site Name
- Hailsham - Diplocks Way, Hanson Premix

Admin Ref.
E144



Knowles
Farm
End

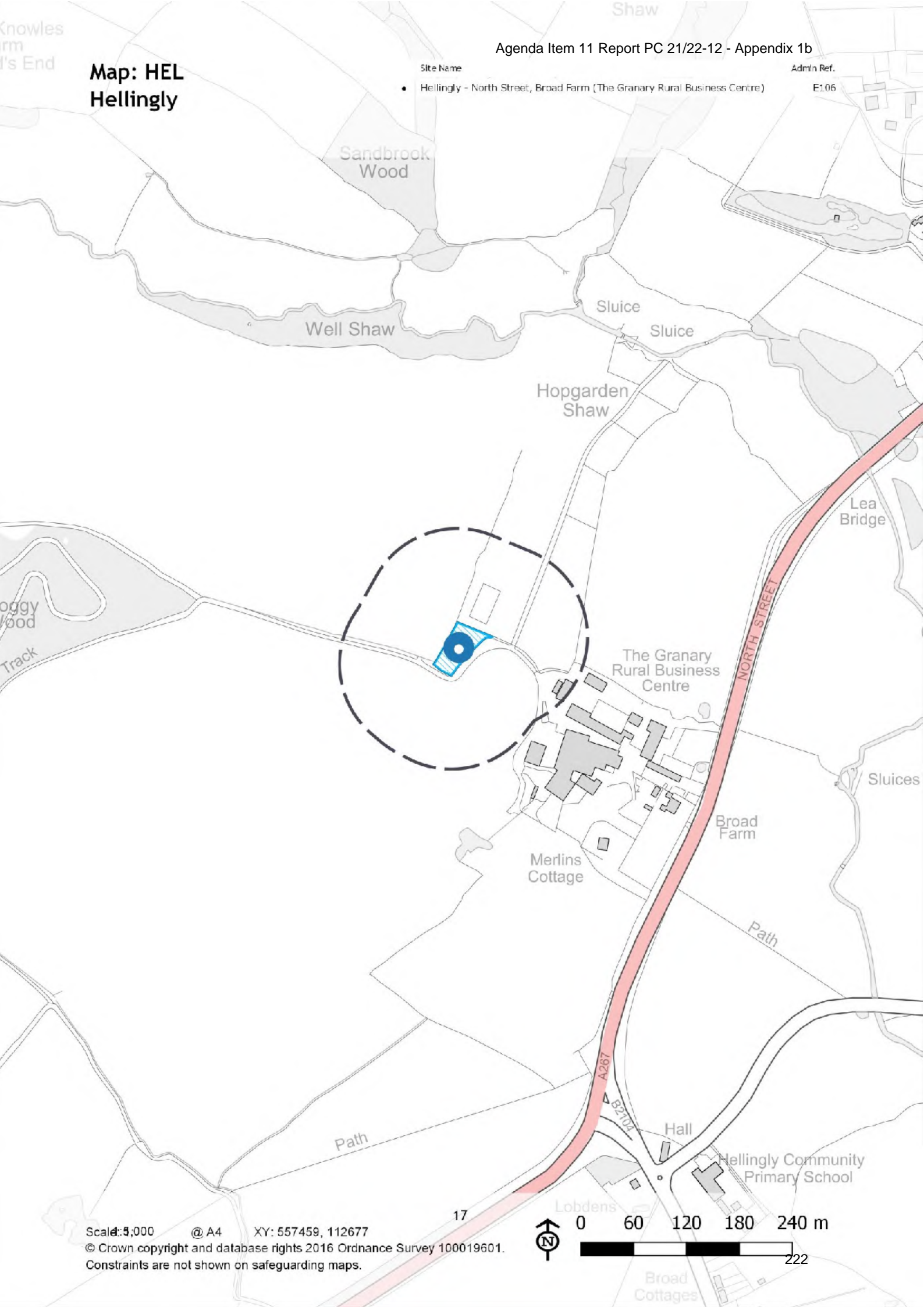
Map: HEL Hellingly

Site Name

- Hellingly - North Street, Broad Farm (The Granary Rural Business Centre)

Admin Ref.

E1.06



oggy
Wood
Track

Lea
Bridge

Sluices

Broad
Farm

Merlins
Cottage

Path

Hall

Hellingly Community
Primary School

Lobdens

Broad
Cottages

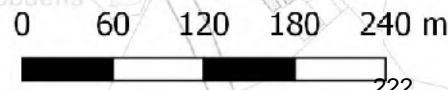
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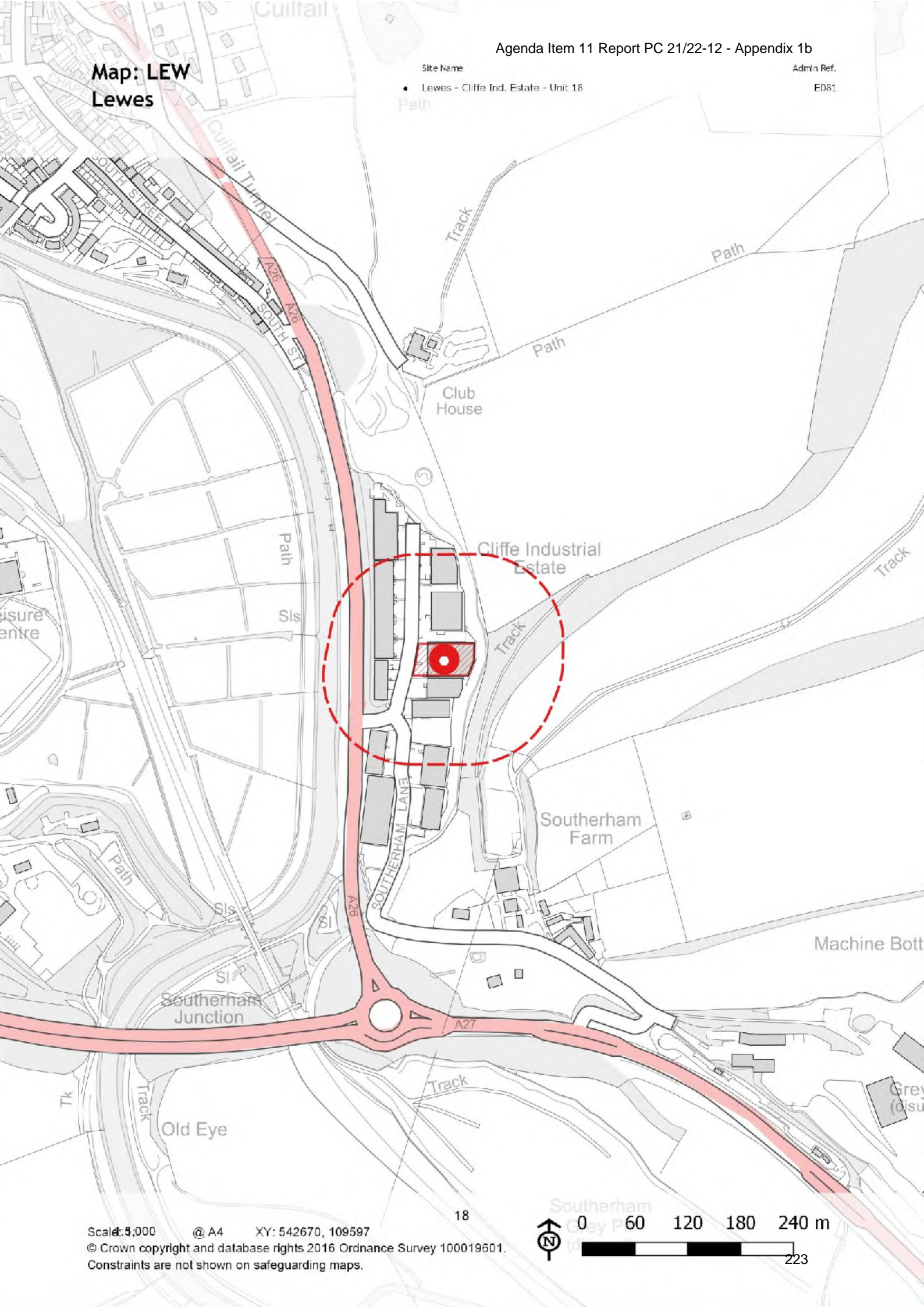
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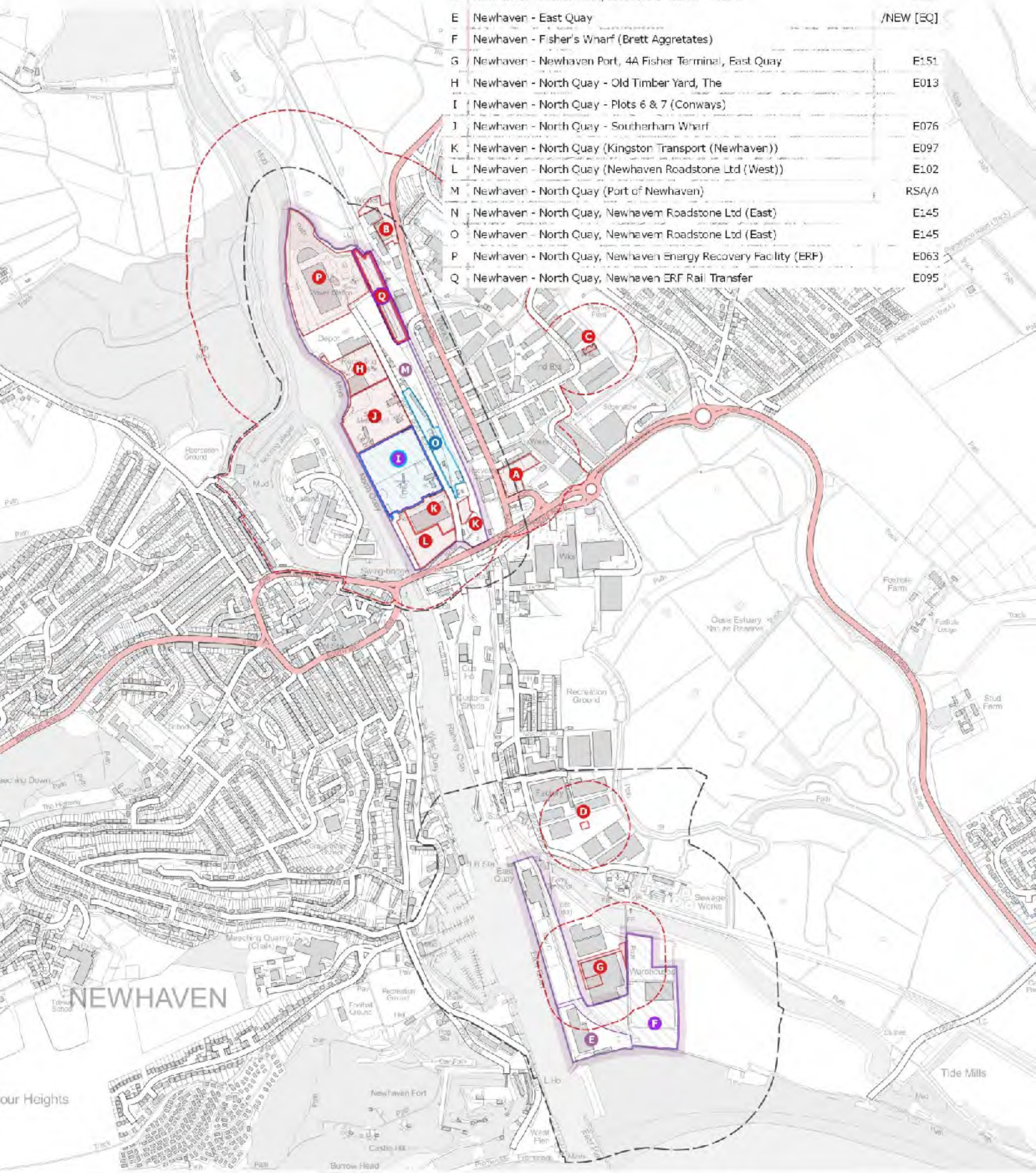
Map: LEW
Lewes

Site Name
• Lewes - Cliffe Ind. Estate - Unit 18
Admin Ref.
E081



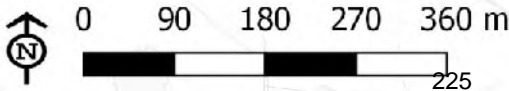
Map: NEW Newhaven

Site Name	Admin Ref.
A Newhaven - Avis Way / New Road Ind. Estate - Newhaven HWRC	E125
B Newhaven - Avis Way / New Road Ind. Estate - Titan Works (Greenacre)	E124
C Newhaven - Avis Way / New Road Ind. Estate - Unit F	
D Newhaven - Beach Road, Endeavour Works - Unit G	E109
E Newhaven - East Quay	/NEW [EQ]
F Newhaven - Fisher's Wharf (Brett Aggregates)	
G Newhaven - Newhaven Port, 4A Fisher Terminal, East Quay	E151
H Newhaven - North Quay - Old Timber Yard, The	E013
I Newhaven - North Quay - Plots 6 & 7 (Conways)	
J Newhaven - North Quay - Southerham Wharf	E076
K Newhaven - North Quay (Kingston Transport (Newhaven))	E097
L Newhaven - North Quay (Newhaven Roadstone Ltd (West))	E102
M Newhaven - North Quay (Port of Newhaven)	RSA/A
N Newhaven - North Quay, Newhaven Roadstone Ltd (East)	E145
O Newhaven - North Quay, Newhaven Roadstone Ltd (East)	E145
P Newhaven - North Quay, Newhaven Energy Recovery Facility (ERF)	E063
Q Newhaven - North Quay, Newhaven ERF Rail Transfer	E095



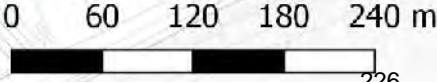
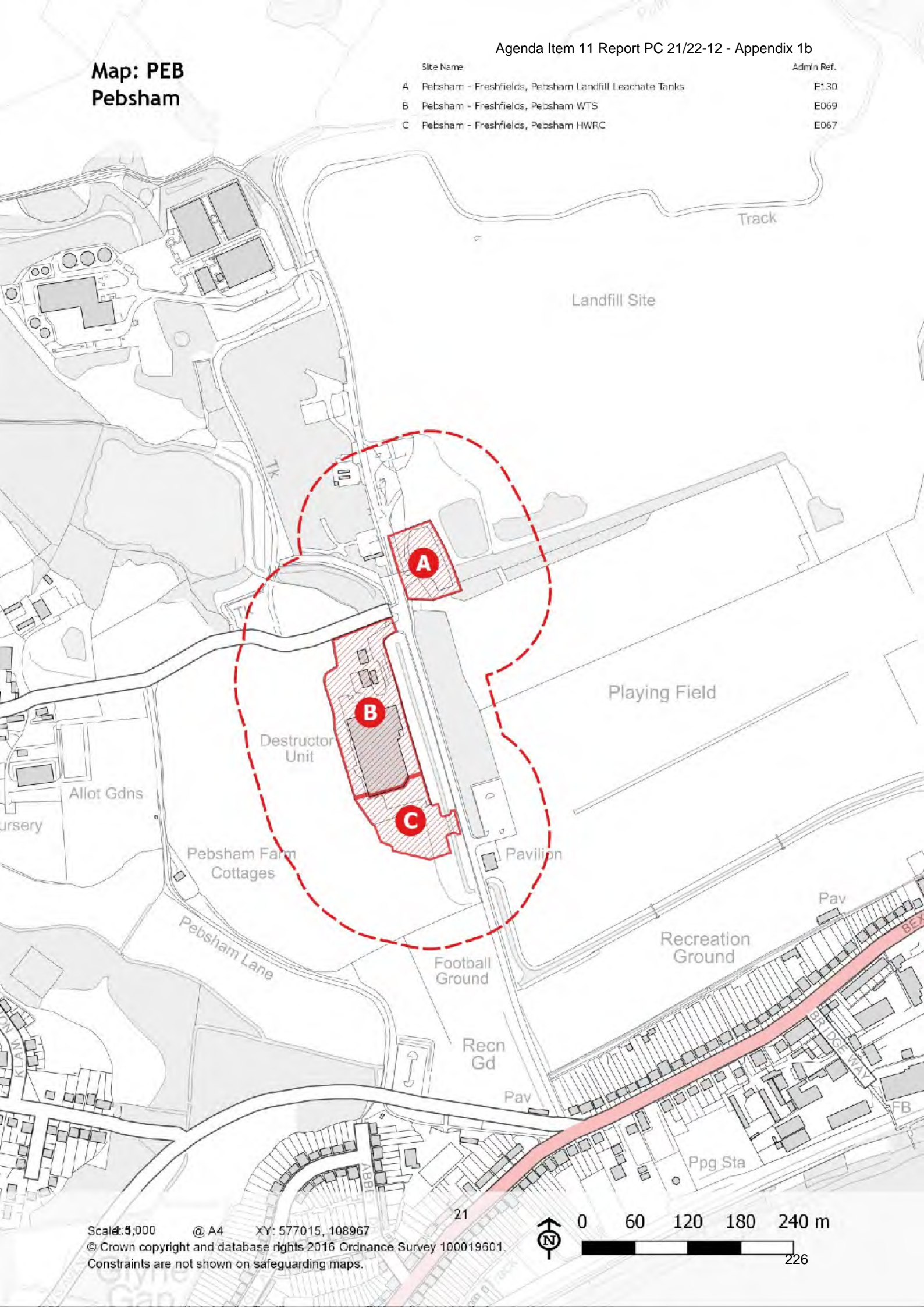
Map: NIN
Ninfield

Site Name	Admin Ref.
A Ninfield - A259, Little Standard Hill Farm	E?????
B Ninfield - A259, Ninfield Concrete Plant (Tarmac Topblock)	E147



Map: PEB
Pebsham

Site Name	Admin Ref.
A Pebsham - Freshfields, Pebsham Landfill Leachate Tanks	E130
B Pebsham - Freshfields, Pebsham WTS	E069
C Pebsham - Freshfields, Pebsham HWRC	E067

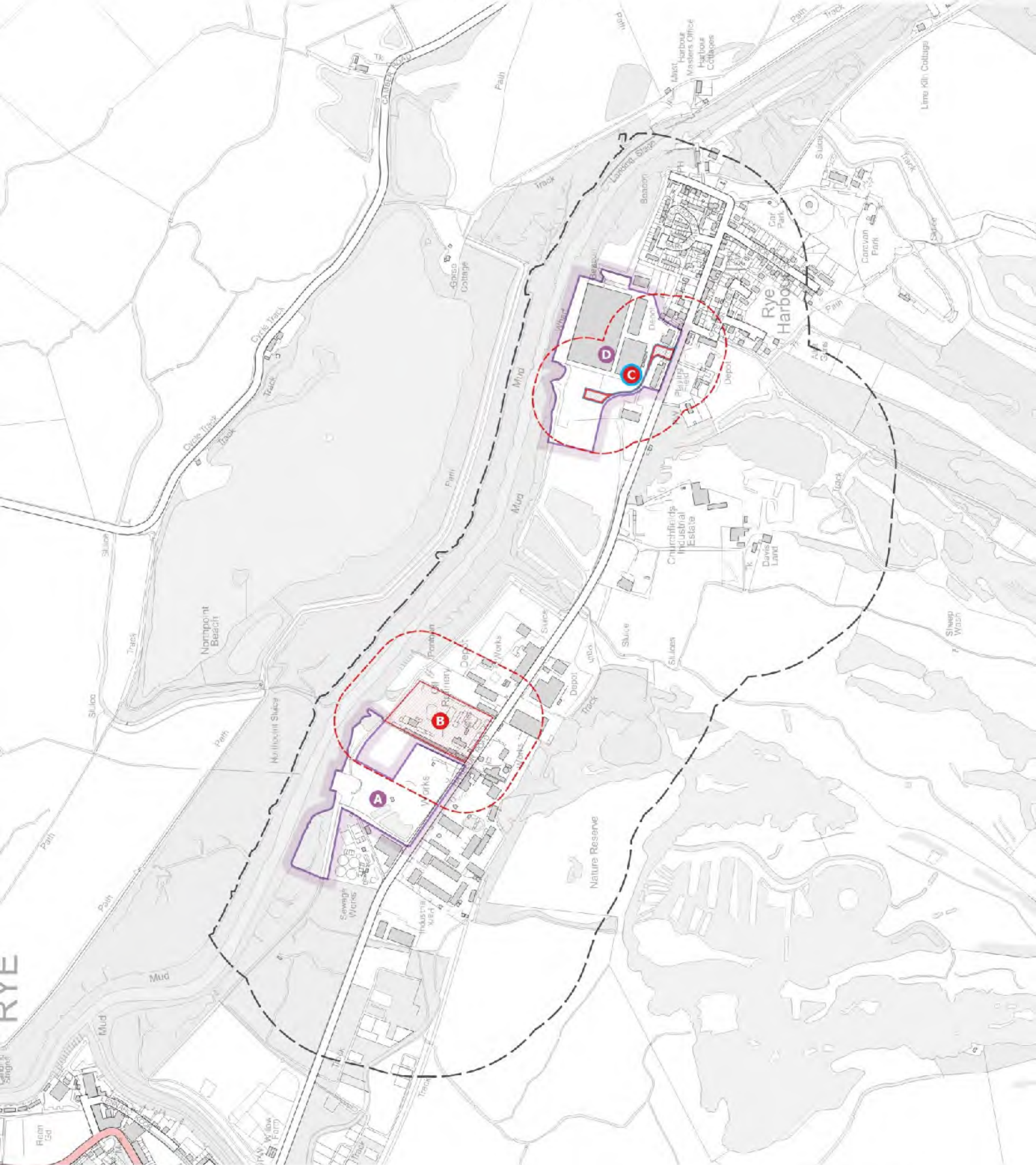




PORTSLADE-BY-SEA

Map: RYE
Rye

Site Name	Admin Ref.
A Rye - ARC Wharf	/RYE [ARC]
B Rye - Harbour Road, Rye Oil Ltd	E073
C Rye - Harbour Road, Rye Wharf / Saltings	E148
D Rye - Rastrum's Wharf	/RYE [RAS]



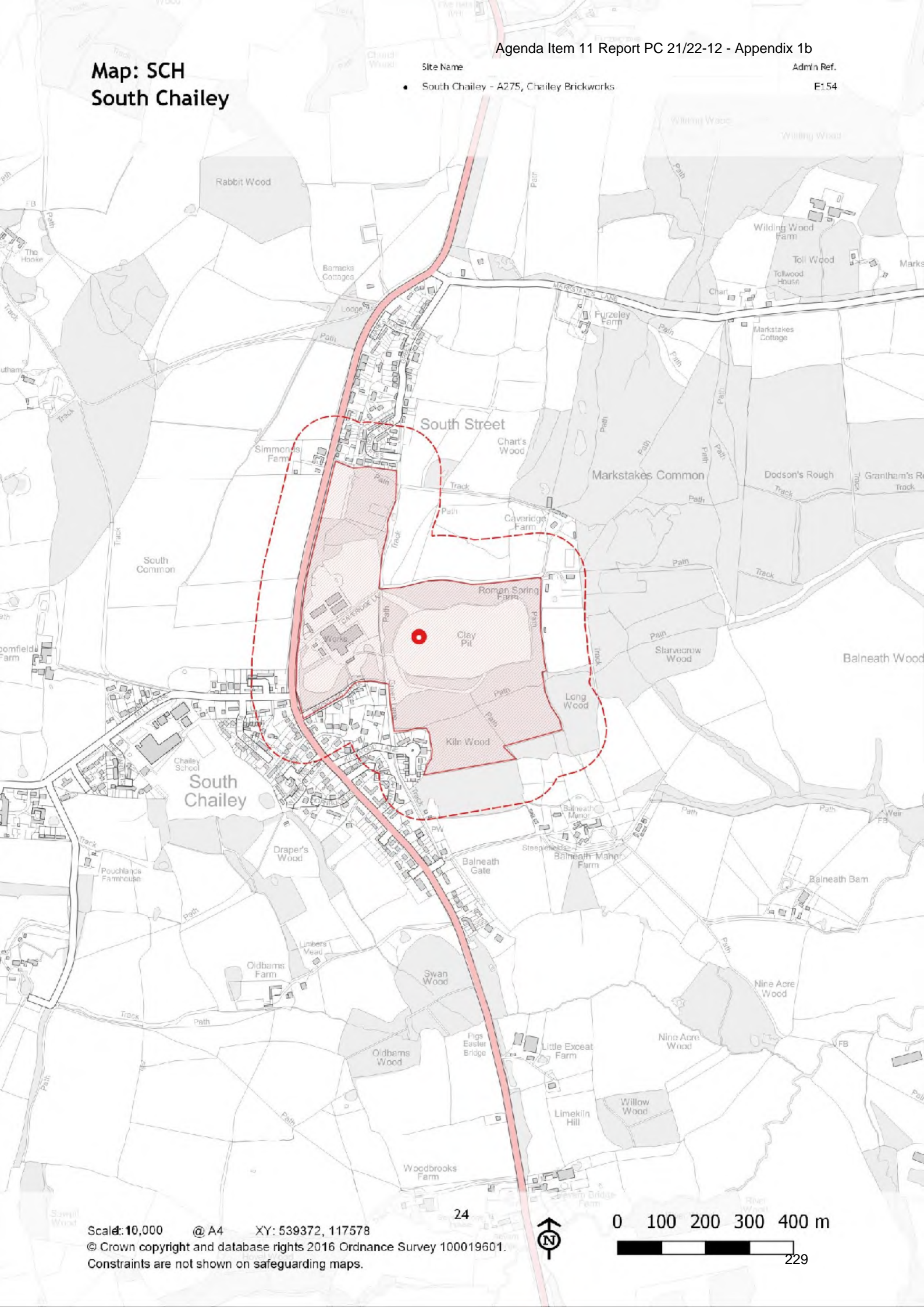
Map: SCH South Chailey

Site Name

Admin Ref.

- South Chailey - A275, Chailey Brickworks

E154



Scale: 10,000 @ A4 XY: 539372, 117578

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Constraints are not shown on safeguarding maps.

24



0 100 200 300 400 m



229

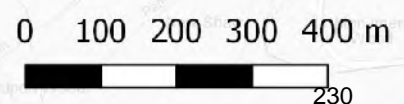
Map: SED
Sedlescombe

Agenda Item 11 Report PC 21/22-12 - Appendix 1b

Site Name

Admin Ref.

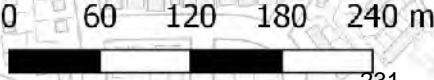
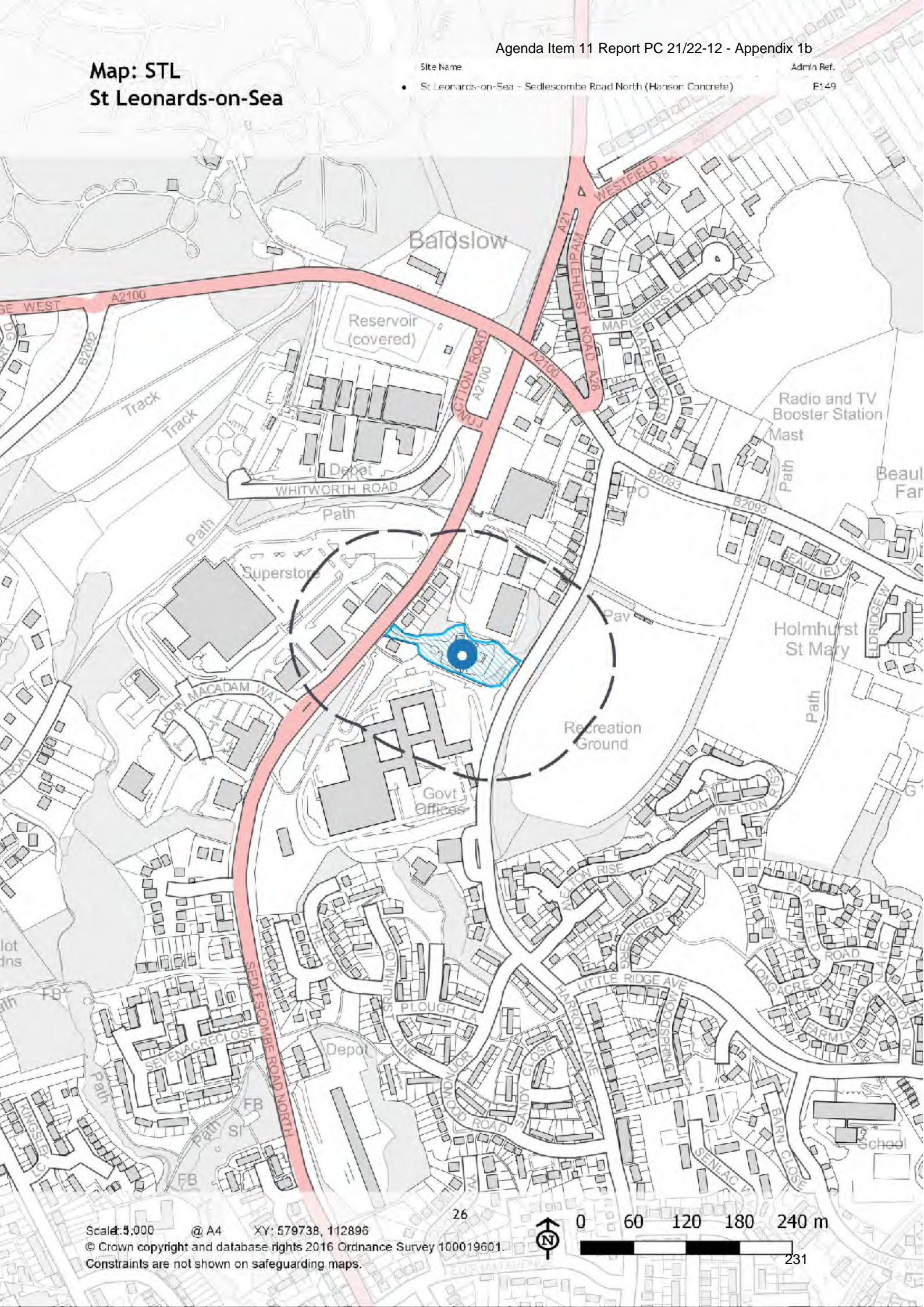
- Sedlescombe - Pokehold Wood (Aldershaw Handmade Tiles Ltd)
- Aldershaw Farm, Sedlescombe



Map: STL
St Leonards-on-Sea

- Site Name
- St Leonards-on-Sea - Sedlescombe Road North (Hanson Concrete)

Admin Ref.
E149



Map: UCK
Uckfield

Site Name

Admin Ref.

- Uckfield - Bellbrook Industrial Estate, Unit 19

E082



Withdrawn Maps

The following safeguarding and consultation areas are withdrawn:

East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan (2017)

Reference	Title	WMSP Page	Map Re-placed?
Minerals Safeguarding Areas			
MSA/H	Broomhill, Lydd (Sand and Gravel)	150	✗
MSA/H	Scotney Court, Lydd (Sand and Gravel)	150	✗
MSA/H	Scotney Court extension / Wall Farm, Lydd (Sand and Gravel)	150	✗
MSA/I	Stanton's Farm and Novington Sandpit, Plumpton (Building Sand)	151	✓
MSA/G	Little Standard Hill Farm (Clay)	149	✓
Safeguarded Waste Sites			
WCA/D	Brett Concrete Works (Unit 1), Brett Drive, Bexhill (SWS)	100	✓
WCA/H	Church Fields, Rye Harbour Road, Rye (AGG)	104	✗
WCA/I	City Recycling Centre & Ferry Wharf, Portslade-By-Sea (SWS/AGG)	105	✗
WCA/L	Downbarn Farm, Ninfield (AGG)	108	✗
WCA/AB	Newhaven (ALOC/SWS/AGG/HRC)	124	✓
WCA/AE	Pebsham HWRC & WTS (SWS/HRC)	127	✓
WCA/AJ	Tarmac Topblock, Ninfield (AGG)	132	✗
Safeguarded Wharves and Railheads			
RSA/C	Rye (Port of), safeguarded wharves	156	✓

List of Environmental Designations

Policy RD1 makes reference to ‘environmental designation’ below is a list of designations known at the time of writing that may be relevant when considering the determination of a planning application.

- Listed Buildings
- Scheduled Monuments
- Conservation Areas
- Registered Parks and Gardens
- Registered Battlefields
- Designated Wreck Sites
- Areas of Outstanding Natural Beauty (AONB)
- South Downs National Park
- High Quality Agricultural Land
- Special Protection Areas
- Special Areas of Conservation
- Ramsar Site
- Marine Conservation Zones
- Sites of Special Scientific Interest
- Local Wildlife Sites
- Local Nature Reserves
- Ancient Woodlands
- National Nature Reserves
- Biodiversity Action Plan (BAP) Habitats

Planning Policy & Development Management

Planning & Environment Service
Communities, Economy & Transport
East Sussex County Council
County Hall
St Anne's Crescent
Lewes
East Sussex
BN7 1UE

01273 481846

Planning Directorate

South Downs National Park Authority
South Downs Centre
North Street
Midhurst
GU29 9DH

0300 303 1053

Planning Policy

Brighton & Hove City Council
Hove Town Hall
Norton Road
Hove
BN3 2BQ

01273 292505

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

Waste and Minerals Local Plan Review
Sustainability Appraisal

August 2021

East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan: Revised Policies Document
Sustainability Appraisal (August 2021)

Preamble & Copyright

Version: 2.01
Date: 2021-08-20

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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 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 Aldershaw Tiles Quarry (near Sedlescombe), which produces clay for use in specialist tile making. A number of other responses were also 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. This Draft Revised Policies document set out the alterations that the Authorities are thinking of making to the Waste and Minerals Local Plan.

- 1.8 In 2020 the Authorities published the Draft Revised Policies Document and held a public consultation on the strategy. Following that consultation, the Revised Policies Document was updated to take account of the response from the consultation.

What does the updated Revised Policies Document propose?

- 1.9 The proposed strategy seeks to minimise the use of aggregates in construction (Policy RM0), then 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 support for an extension to the Aldershaw Tiles Quarry, a small quarry that provides clay for speciality building tiles. The support for an extension (Policy RM2) does not identify a specific area, but provides a number of criteria that must be met before planning permission can be granted.

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	<p>A requirement for net-gain in biodiversity has been added to the policy.</p> <p>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.</p> <p>...</p> <p>Supporting text in relation to soils and their role in biodiversity and</p>

		carbon capture have been included to reflect updated policy & guidance.
--	--	---

What has changed between the Draft Revised Policies Document and the updated version?

- 1.13 The updated version of the Revised Policies Document contains many changes, most of them small. Beyond those, two significant changes have been made. Firstly, the introduction of Policy RM0 which places an emphasis of minimising aggregate use, before sourcing it from recycled and then other sources, which should help make best use of the available aggregate. And secondly, Policy RM2 which previously allocated a new area for the extraction of clay at the Aldershaw Tiles site, no longer allocates a specific area. It now supports an extension subject to a number of requirements being made, subject to a number of requirements, one of which is that any extension should not harm the ancient woodland.

What is a sustainability appraisal?

- 1.14 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.
- 1.15 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.
- 1.16 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.
- 1.17 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”.

- 1.18 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 as to the effects of choosing a strategy.

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

- 1.19 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.
- 1.20 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?

- 1.21 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.
- 1.22 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.

- 1.23 Following the 2020 Consultation consideration was given to whether or not to include within the strategy promotion of minimising aggregate use in development; the alternative being the status quo, i.e. no policy. It was assessed that the minimisation of aggregate use was desirable, particularly in relation to making best use of aggregate, and in relation to supporting the local economy. The Authorities chose to include this as part of the RPD's strategy.
- 1.24 In relation to the provision of clay and the choice was whether to extend the Aldershaw Tiles Quarry or not. The initial 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. Within the RPD it was assessed that allocating a site was desirable but following consultation the authorities reviewed this approach and continued discussions with the operator. A third option was identified that supported an extension at the site, subject to several criteria, but not allocate a specific area. This was assessed to perform better than the allocation option, particularly as it would be less likely that harm would come to the ancient woodland.
- 1.25 Assessments were also carried out on options relating to the safeguarding minerals facilities and the prior extraction of minerals.
- 1.26 As the Draft Revised Policies document was prepared an assessment of each of the policies contained within the RPD was undertaken.

- 1.27 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 minimisation of use of aggregates and 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.
- 1.28 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.
- 1.29 The revised policies are likely to have moderate mixed effects in relation to biodiversity / geodiversity. 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.
- 1.30 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.

- 1.31 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.
- 1.32 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.
- 1.33 None of the assessment identified any potentially significant effects on internationally protected environmental sites.

What happens next?

- 1.34 This Sustainability Appraisal has been published alongside the updated Revised Policies document for a second public consultation, which focuses on the legal compliance and soundness of the RPD. Following the consultation all comments submitted will be collated. These along with the Plan its supporting documents will be submitted to the Government for Public Examination by an Independent Inspector. The Inspector will assess the legal compliance and soundness of the plan, alongside all the comments received during the consultation.

Can I comment on the Sustainability Appraisal?

- 1.35 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 Directive¹ 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

¹ 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 Revised Policies (Local Plan) Document

- 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:
- Promote the minimisation of aggregate use in construction (Policy RM0);
 - 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 	This is documented in this report and its technical annex.

	<p>reasonable alternatives.</p> <p>3. Evaluate the likely effects of the Local Plan and Alternatives.</p> <p>4. Consider ways of mitigating adverse effects and maximising beneficial effects.</p> <p>5. Propose measure to monitor the significant effects of implementing the Local Plan.</p>	
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.

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.
<p>Consultation procedures (regulation 13)</p> <p>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.</p>	A public consultation on the Waste and Minerals Local Plan Review: Scoping Report was held 6 March 2018 - 17 April 2018.
<p>Information as to adoption of plan or programme (regulation 16)</p> <p>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)</p>	<p>This is not addressed within this document at this time.</p> <p>An adoption statement will be produced should the Plan be adopted.</p>

<p>Monitoring of implementation of plans or programmes (regulation 17)</p> <p>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)).</p>	<p>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.</p>
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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

		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 defined² 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:

² 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 Re-view, 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.

- *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.

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

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

- 6.3 When considering the options on aggregate supply to the Plan Area it is important to note that that one of the reasons for the Review was the impending exhaustion of permitted mineral reserves at Lydd Quarry. Consequently, this initially presents the two options both of which could be considered to reflect the status quo depending on the position taken. Option A would seek to maintain the status quo through allocation of additional land won mineral reserves. Option B is similar to a 'do nothing' scenario which recognises the time limited nature of the permitted quarry by focusing on using existing recycled and marine aggregate provision alongside road and rail imports.
- 6.4 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.

A2 - Sustainable Aggregate Use

- *Option A. Status Quo* - The Plan remains silent in respect of aggregate use minimisation and relies on the NPPF definition of Sustainable Development (para 8), and design policies contained within other Local Plans.
- *Option B. Promote minimisation / sustainable use of aggregates* - The Plan would advocate the innovation and minimisation of aggregate use in all developments, and then prioritise recycled and secondary aggregate over virgin material; and support other Local Plans promoting similar approaches.

Summary & Conclusion

- 6.5 Following the 2020 consultation on the Draft Revised Policies a further review of the likely aggregate demand (See RM1) was undertaken. As part of that review, it was identified that, whilst the Waste and Minerals Local Plan promotes waste minimisation, it is silent on the topic of resource use in general. Aggregates are essential for construction, but they are also a finite resource. This presents a choice of whether or not the Plan should advocate making best use of the aggregates available by seeking to minimise their use.
- 6.6 Compared with the status quo (Option A), Option B more likely to make more efficient use of aggregate which in turn will prolong the life of mineral reserves. Option B may, by reducing the amount of materials being used and transported, also indirectly also contribute to limit the causes of and adapt to climate change and reduce adverse impacts of transporting waste and minerals on the environment. Overall, Option B is considered to be more sustainable option.

Topic B: Safeguarding Minerals and Minerals Infrastructure

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

- 6.7 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.

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

- 6.8 Two options have been proposed, one of which, Option B, seeks to extend the area of minerals infrastructure being safeguarded. The selection of these areas is based on national policy which indicates that locally and nationally significant reserves should be safeguarded. The identification of the boundaries for these areas is a matter of technical judgment and is, therefore, not addressed within this SA.
- 6.9 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

- 6.10 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

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.
- *Option C. Broad area identification.* - Support an extension to Aldershaw Tiles extending the lifespan of the quarry, subject to a number of requirements, without identifying a specific location.

Summary & Conclusion

- 6.11 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 be possible to provide some mitigation of compensatory planting as part of a restoration scheme.
- 6.12 Not allocating the site (Option A) would likely result in the closure of the site, with effects approximate to the reverse of the above.
- 6.13 Supporting the extension of Aldershaw Tiles without identifying a specific allocation at this time (Option C) is likely to have similar outcomes to Option B, but without a specific site identified the effect on the Ancient Woodland, other habitats, and species is uncertain.
- 6.14 Option C is assessed to be the more sustainable of the three.

Objective	Obj1.	Obj2.	Obj3.	Obj4.	Obj5.	Obj6.	Obj7.	Obj8.	Obj9.	Obj10.	Obj11.	Obj12.	Obj13.	Obj14.	Obj15.	Obj16.	Obj17.
Topic A: Provision of Aggregates																	
A1 - Source of aggregate supply (excluding soft sand)																	
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	++	•
A2 - Sustainable Aggregate Use																	
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	•	•
Option B. Promote minimisation / sustainable use of aggregates	N/A	N/A	N/A	+	++	N/A	N/A	N/A	+	N/A	+	N/A	N/A	N/A	N/A	+	•
Topic B: Safeguarding Minerals and Minerals Infrastructure																	
B1 - Prior Extraction of Minerals																	
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

B2 - Safeguarding Minerals Infrastructure																	
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																	
D1 - Provision of Specialist Clay																	
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	+	+
Option C. Broad area identification.	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.

Objective	RV1	RW1	RM0	RM1	RM2	RM3	RM4	RM5	RM6	RM7	RD1
1. Health			N/A	+	N/A		N/A	N/A			N/A
2. Neighbouring Amenity			N/A	+/-	•		N/A	+			N/A
3. Equality & Access			N/A	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			N/A
7. Water Resource			N/A	N/A	N/A		N/A	N/A			N/A
8. Flood Risk			N/A	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			N/A
11. Transport			+	+/-	+/?		+	N/A			N/A
12. Soil			N/A	N/A	N/A		N/A	N/A			N/A
13. Historic & Built Environment			N/A	+	•/?		N/A	N/A			•
14. Biodiversity / Geodiversity			N/A	-	+/?		•	N/A			•/?
15. Renewable Energy			N/A	N/A	N/A		N/A	N/A			N/A
16. Economy			+	++	+		?	N/A			•/?
17. Employment			N/A	+	+		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 2. Neighbouring Amenity 4. Waste Minimisation 9. Climate Change 10. Air quality and pollution 13. Historic & Built Environment 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 RM0 emphasising resource minimisation, 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. Policy RM0 may also help support and diversify the economy by promoting the development of low aggregate construction methods.
- 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 the minimisation of aggregate use (RM0), 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). 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), neighbouring amenity (Objective 2), waste management (Objective 4), climate change (Objective 9), air quality and pollution (Objective 10), the historic and built environment (Objective 13) 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. Neighbouring amenity may be affected by changing traffic patterns likely caused by the approach set out in RM1, but it should also be better protected near minerals sites as a consequence of safeguarding policy set out in RM5. 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. Waste minimisation (Objective 4) is likely to be supported by Policy RM0 seeking to minimise the use of materials in the first instance. The effect on the historic and built environment (Objective 13) has been assessed as likely to be positive, owing focus of reusing existing facilities under RM1.

- 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 Aldershaw Tiles site. The extraction will enable the continued supply of clay for specialist tiles and all the associated economic effects.

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 the 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:

East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan: Revised Policies Document
Sustainability Appraisal (August 2021) - 8. Appraisal of Plan an

/	Positive impact
/?	Possible positive impact
?	Uncertain / unknown
x?	Possible negative impact
x	Negative impact
ø	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.

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

Continued over leaf...

Objective	Continued from over leaf	Providing for Minerals											Overarching Policies							Continued over leaf...
		RM0	RM1	WMP12	WMP13	RM2	WMP14 RM3‡	SP8 RM3 ‡	RM4	RM5	SP10 RM6	SP11 RM7	WMP16	WMP17	WMP18	SP99	WMP20	WMP21	WMP22	
1. Health		N/A	+	0	?	N/A	0	N/A	N/A	N/A	+/?	+/?	?	?	/?	/?	/?	0	?	
2. Neighbouring Amenity		N/A	+/-	0	?	•	0	N/A	N/A	+	+/?	+/?	?	?	/?	/?	0	?	?	
3. Equality & Access		N/A	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	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	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	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	+/-	?	/?	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	N/A	?	x?	N/A	0	N/A	N/A	N/A	N/A	N/A	?	0	0	?	0	0	?	
13. Historic & Built Environment		N/A	+	0	x?	• / ?	0	N/A	N/A	N/A	N/A	N/A	x	/?/?	0	?	0	0	?	
14. Biodiversity / Geodiversity		N/A	-	0	x?	+ / • / ?	0	N/A	•	N/A	N/A	N/A	x	/?/?	0	?	0	0	?	
15. Renewable Energy		N/A	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		N/A	+	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		Development Management Policies							
		WMP23a	WMP23b	WMP24a	WMP24b	WMP25	WMP26	WMP27 RD1 *	RD1 *
1. Health	.. Continued from over leaf	Ø	Ø	Ø	Ø	✓	✓	Ø	N/A
2. Neighbouring Amenity		✓	✓	Ø	Ø	✓	✓	✓	N/A
3. Equality & Access		Ø	Ø	Ø	Ø	Ø	Ø	Ø	N/A
4. Waste Minimisation		Ø	Ø	✓	✓	Ø	Ø	Ø	N/A
5. Sustainable Minerals Use		Ø	✓	Ø	Ø	Ø	Ø	Ø	N/A
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
11. Transport		Ø	Ø	✓	Ø	✓	✓	Ø	N/A
12. Soil		Ø	✓	Ø	Ø	Ø	Ø	✓	N/A
13. Historic & Built Environment		✓	Ø	Ø	Ø	Ø	Ø	✓	•
14. Biodiversity / Geodiversity		Ø	Ø	Ø	Ø	Ø	Ø	✓	• / ?
15. Renewable Energy		Ø	Ø	✓	✓	Ø	Ø	Ø	N/A
16. Economy		Ø	Ø	Ø	✓	Ø	Ø	Ø	• / ?
17. Employment		Ø	Ø	Ø	Ø	Ø	Ø	Ø	N/A

* 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.

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 Revised Policies Proposed Submission document. All representations received from consultees will be collated and along with the RPD be submitted for Public Examination by an independent inspector. The Inspector will consider the legal compliance and “soundness” of the Plan in the context of the representations received.
- 10.2 Full details of the public consultation and the future Public Examination 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

Planning Policy & Development Management

Planning & Environment Service
Communities, Economy & Transport
East Sussex County Council
County Hall
St Anne's Crescent
Lewes
East Sussex
BN7 1UE

01273 481846

Planning Directorate

South Downs National Park Authority
South Downs Centre
North Street
Midhurst
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0300 303 1053

Planning Policy

Brighton & Hove City Council
Hove Town Hall
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01273 292505

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

Waste and Minerals Local Plan Review
Sustainability Appraisal
Technical Annex

August 2020

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About this Document

This is the technical annex to the Waste and Minerals Local Plan Review Sustainability Appraisal 2021 (SA). It contains supporting information used in the preparation of the Sustainability Appraisal 2021.

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* This section has been updated since the last publication of the SA in 2020; unmarked sections have not been changed from the 2020 version of the SA Technical Annex.

Annex A: Review of Policies, Plans and Programmes

This annex contains a summary of policies, plans, programmes and strategies which are relevant to the Review of the Waste and Minerals Local Plan and the implications for the Waste and Minerals Local Plan (Plan) and the Sustainability Appraisal. This section comprises of the following:

- List of Documents - A list of relevant Policies, Plans and Programmes identified.
 - Review of Policies, Plans and Programmes - A series of entries for each of the documents reviewed. Each entry is structured as follows: a title; brief summary of document; implications for the Plan; and implications for the SA. Next to the title in the square brackets [], objectives relevant to that document are identified; cc means cross-cutting and that most or all of the objectives are relevant. The documents are listed in the order they appear in the List of Documents.
 - List of Documents by Objective - A list of the documents relevant to each objective.
 - References - Full references for all of the documents listed in this section.
-

Table of Documents

International Conventions / Treaties

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Legislation (European Union)

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Council Directive 92/43/EEC of 21 May 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora. [14]

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Council Directive 2000/60/EC of 22 December 2000 on establishing a framework for Community action in the field of water policy. [06]

Council Directive 2008/98/EC of 12 December 2008 on Waste and repealing certain Directives. [03, 04]

Council Directive 2009/147/EC of 30 November 2009 on Conservation of Wild Birds. [14]

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Council Directive 2018/2001 of 11 December 2018 on promotion of the use of energy from renewable sources (Text with EEA relevance.). [15]

Council Directive 2018/851 of 30 May 2018 on Amending Directive 2008/98/EC on Waste (Text with EEA relevance). [03, 04]

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Flood & Water Management Act 2010, c.99, London: TSO. [07, 08]

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Review of Policies, Plans and Programmes

International Conventions / Treaties

Convention on Wetlands of International Importance especially as Waterfowl Habitat. Ramsar (Iran), 2 February 1971. UN Treaty Series No. 14583. As amended by the Paris Protocol, 3 December 1982, and Regina Amendments, 28 May 1987. [14]

Summary The Ramsar Convention seeks the protection of internationally significant wetland habitats and wetland birds. In the UK this is achieved through the designation of RAMSAR sites.

Implications for Plan Ramsar designations and potential effect of development on wetland habitats and wetland birds should be a consideration in the preparation of the Plan.

Implications for SA The conservation of wild birds should be reflected within the objectives of the SA.

Legislation (European Union)

Council Directive 91/271/EEC of 21 May 1991 on Urban Waste-Water Treatment. [06]

Summary The Council Directive 91/271/EEC concerning urban waste-water treatment was adopted on 21 May 1991. Its objective is to protect the environment from the adverse effects of urban waste water discharges and discharges from certain industrial sectors (see Annex III of the Directive) and concerns the collection, treatment and discharge of: Domestic waste water; Mixture of waste water; Waste water from certain industrial sectors (see Annex III of the Directive).

Four main principles are laid down in the Directive: Planning; Regulation; Monitoring; and Information and reporting. Specifically the Directive requires: The Collection and treatment of waste water in all agglomerations of >2000 population equivalents (p.e.); Secondary treatment of all discharges from agglomerations of > 2000 p.e., and more advanced treatment for agglomerations >10 000 population equivalents in designated sensitive areas and their catchments; A requirement for pre-authorisation of all discharges of urban wastewater, of discharges from the food-processing industry and of industrial discharges into urban wastewater collection systems; Monitoring of the performance of treatment plants and receiving waters; and Controls of sewage sludge disposal and re-use, and treated waste water re-use whenever it is appropriate.

Implications for Plan The Plan should seek to ensure that waste water is managed appropriately in accordance with the Directive through adequate provision of waste water management facilities.

Implications for SA The safe management of waste water should be encompassed within the objectives of the SA.

Council Directive 92/43/EEC of 21 May 1992 on the Conservation of Natural

Habitats and of Wild Fauna and Flora. [14]

Summary	<p>The Habitats Directive ensures the conservation of a wide range of rare, threatened or endemic animal and plant species. Some 200 rare and characteristic habitat types are also targeted for conservation in their own right. It seeks to promote the maintenance of biodiversity, taking account of economic, social, cultural and regional requirements.</p> <p>In the UK referred areas designated under this Directive are referred to Special Protection Areas (SPAs) and species listed within the Directive are often referred to as European Protected Species.</p>
Implications for Plan	<p>The Plan should: give consideration to the SPA designation and protected species listed; and promote the conservation of wildlife and their habitats and seek to maintain and promote biodiversity.</p>
Implications for SA	<p>The SA should reflect the objectives of the Directive, namely the conservation of species and habitats and promotion of biodiversity should be reflected in the SA objectives.</p>

Council Directive 2000/76/EC of 4 December 2000 on the Incineration of Waste. [03, 04]

Summary	<p>This Council Directive seeks to prevent or to limit as far as practicable, negative effects on the environment, in particular pollution by emissions into air, soil, surface water and groundwater and the resulting risks to human health, from the incineration and co-incineration of waste. The Directive also sets out limit values for emissions to atmosphere and technical operating requirements.</p>
Implications for Plan	<p>Appropriate pollution prevention criteria should be adopted by the Review to assess potential locations for new waste incineration facilities.</p>
Implications for SA	<p>The SA should consider including objectives that protect the environment, soil, air and water from the impacts of development.</p>

Council Directive 2000/60/EC of 22 December 2000 on establishing a framework for Community action in the field of water policy. [06]

Summary	<p>The Water Framework Directive establishes a legal framework to protect and restore clean water across Europe and ensure its long-term, sustainable use. (Its official title is Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy.) The directive establishes an innovative approach for water management based on river basins, the natural geographical and hydrological units and sets specific deadlines for Member States to protect aquatic ecosystems. The directive addresses inland surface waters, transitional waters, coastal waters and groundwater. It establishes several innovative principles for water management, including public participation in planning and the integration of economic approaches, including the recovery of the cost of water services. In its Article 3, the directive calls for the creation of international districts for river basins that cover the territory of more than one Member State and for coordination of work in these districts.</p> <p>In the UK river basin management plans have been prepared in accordance with this Directive.</p>
Implications	<p>The Plan should: take into account and support the aims and objectives of the</p>

for Plan directive and plans prepared in accordance with the directive.

Implications for SA The SA should: seek to support the improvement and maintenance of water quality.

Council Directive 2008/98/EC of 12 December 2008 on Waste and repealing certain Directives. [03, 04]

Summary This Directive aims to reduce landfill and associated greenhouse gas emissions through increasing waste prevention and recycling rates and encouraging use as a secondary resource. It provides **definitions** including: waste; hazardous waste; waste producer; waste management; prevention; re-use; treatment; preparing for re-use; recycling; recovery; disposal; and Waste Hierarchy, the. And also includes **targets** for recycling such as: 50% household waste recycled by 2020; and 70% construction & demolition waste recycled by 2020.

Implications for Plan The Plan should: be based on definitions defined within Directive; reflect the hierarchy set out in the Directive; and ensure sufficient facilities are provided so targets can be met.

Implications for SA The SA should: be based on definitions defined within Directive; and consider objectives relating to provision of adequate supply of suitable waste facilities, to reduce waste and to reduce waste sent to landfill.

Council Directive 2009/147/EC of 30 November 2009 on Conservation of Wild Birds. [14]

Summary This directive is a codified version of Council Directive 79/409/EEC. It seeks to reverse the decline in the number of wild birds and wild bird species within the EU. This is to be achieved by the protection of existing habitats the designation of Special Protection Areas. It also sets out which species are to be protected, often referred to as European Protected Species; and those which may be legally hunted under licence.

Implications for Plan SPA designations and potential effect of development on wild birds should be a consideration in the preparation of the Plan.

Implications for SA The conservation of wild birds should be reflected within the objectives of the SA.

Council Directive 2012/19/EU of 4 July 2012 on Waste Electrical and Electronic Equipment (WEEE). [03, 04]

Summary This Directive recast Directive 2002/96/EC and made a number of alterations. The purpose of this Directive is to contribute to sustainable production and consumption by, as a first priority, the prevention of WEEE and, in addition, by the re-use, recycling and other forms of recovery of such wastes so as to reduce the disposal of waste and to contribute to the efficient use of resources and the retrieval of valuable secondary raw materials. It also seeks to improve the environmental performance of all operators involved in the life cycle of EEE, e.g. producers, distributors and consumers and, in particular, those operators directly involved in the collection and treatment of WEEE. It also holds producers of electrical equipment will be responsible for taking back and repairing, recycling or recovering electrical and electronic equipment.

Targets - Depending on the type of WEEE: during 2012 and 2015, between: 70% to 80% will be recovered, and 50% and 75% will be recycled; and during 2015 and 2018,

between: 75% to 85% will be recovered, and 55% and 85% will be recycled.

Definitions include: Electrical and Electronic Equipment (EEE); and Waste Electrical and Electronic Equipment (WEEE).

Implications for Plan In preparing the Plan the Authorities should consider the impact of the WEEE reuse, recycling and recovery targets on the number and type of waste management facilities that may be required.

Implications for SA SA objectives should consider the need to increase re-use, recycling and recovery of WEEE waste.

Council Directive 2018/2001 of 11 December 2018 on promotion of the use of energy from renewable sources (Text with EEA relevance.). [15]

Summary This directive recasts and repeals previous legislation (Directive 2009/28/EC, Directive (EU) 2015/1513 and Council Directive 2013/18/EU).

Promoting renewable forms of energy is one of the goals of EU energy policy. The increased use of energy from renewable sources is an important part of the package of measures needed to reduce greenhouse gas emissions and to comply with the 2015 Paris Agreement on Climate Change and the EU policy framework for climate and energy (2020 to 2030).

This recast directive, along with the revised Energy Efficiency Directive and a new Governance Regulation, is part of the Clean Energy for All Europeans package, which aims to provide new, comprehensive rules on energy regulation for the next decade.

It includes a target for a binding EU overall target for 2030 of at least 32% of energy from renewable sources.

Implications for Plan The definition of energy from renewable sources includes: biomass, landfill gas, sewage treatment plant gas and biogases. Plan should seek, where appropriate, to encourage development of energy from renewable sources.

Implications for SA Topic of renewable energy may be relevant for consideration when setting objectives and criteria.

Council Directive 2018/851 of 30 May 2018 on Amending Directive 2008/98/EC on Waste (Text with EEA relevance). [03, 04]

Summary The Directive amends the Waste Framework Directive. It seeks to embed the circular economy into the Waste Framework Directive. Among other alterations, it alters: Article 1: Subject matter and scope (this involves alterations to definitions of specific types of waste; includes a new definitions for 'material recovery', 'backfilling' and 'extended producer responsibility', and extended producer responsibility requirements); introduction of Article 8a: General minimum requirements for extended producer responsibility schemes; Article 9: Prevention of waste (includes new targets to reduce food waste by 50% by 2030 as per UN Sustainable Development Goal; Article 10: Recovery (new targets: the preparing for re-use and the recycling of municipal waste shall be increased to a minimum of: 55% [2025], 60% [2030], 65% [2035]); Article 20: Hazardous waste produced by households (separate collections for hazardous waste from households); Article 22: Bio-waste (Member States shall ensure that, by 31 December 2023 and subject to Article 10(2) and (3), bio-waste is either separated and recycled at source, or is collected separately and is not mixed with other types of waste).

Other articles are amended; only the most relevant amendments for the WMLP are

listed above. Reporting and recording requirements are also included in the Directive.

Implications for Plan	<ul style="list-style-type: none"> The Plan currently includes the 2025 target, but will need to include the later targets when the waste targets are reviewed. The types of waste materials entering waste streams is likely to alter in the future which may require different treatment methods and a reduction in landfill requirements. The implications of the updated definitions may require consideration to avoid ambiguity in the Plan.
Implications for SA	The topic of waste, recycling, recovery and the circular economy should be included within future objectives and criteria.

Council Directive 2019/904 of 5 June 2019 on reduction of the impact of Certain plastic products on the environment (Text with EEA relevance). [03, 04]

Summary This directive aims to prevent and reduce the impact on the environment of certain plastic products and to promote a transition to a circular economy by introducing a mix of measures tailored to the products covered by the directive, including an EU-wide ban on single-use plastic products whenever alternatives are available. The directive delivers on the EU's plastic strategy, an important element in the EU's move towards a circular economy.

It seeks to reduce the use of single-use plastics. Single-use plastics are made wholly or partly of plastic and are typically intended to be used just once or for a short period of time before they are thrown away.

The directive involves:

- Market restrictions (bans) of certain items.
- Consumption restrictions (EU countries are required to take measure to reduce consumption and monitor consumption) of certain items.
- Plastic bottles: 90% collection target for recycling for plastic bottles by 2029; New bottles should contain at least 25% recycled by 2025 and 30% recycled content by 2030.
- Compulsory marking (labelling) on certain items.
- Extended producer responsibility.
- Member state awareness raising.

This directive has to be transposed into law in the EU countries by 3 July 2021. The market restrictions and marking of product rules apply from 3 July 2021, while the product design requirements for bottles apply from 3 July 2024. The Extended producer responsibility measures apply from 31 December 2024.

Implications for Plan	Type of waste materials entering waste streams is likely to alter in the future which may require different treatment methods and a reduction in landfill requirements.
Implications for SA	Awareness of changing forms of waste.

Legislation (UK)

National Parks and Countryside Act 1949, c.97, London: TSO. [13]

Summary The 1949 Act makes provision for National Parks. Section 11A, sub-section (2) places

specific duty on Local Authorities and other public bodies to have regard to the purposes of the National Park. The Act also specifically states "if it appears that there is a conflict between those purposes, (the local authority) shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park." The Environment Act 1990 section 62 amends section 11A of the 1949 Act, however the above duty still remains.

Implications for Plan The Plan should protect the National Park and have regard to the purposes of the National Park. Plan should consider the impact on development within or adjacent to the National Park, including impacts of the setting of the National Park, and views from or of the National Park.

Implications for SA The SA objectives should seek to protect the National Park and have regard to the purposes of the National Park.

Environment Protection Act 1990, c.49, London: TSO. [13]

Summary See entry for National Parks and Countryside Act 1949.

Implications for Plan See entry for National Parks and Countryside Act 1949 for Review implications.

Implications for SA See entry for National Parks and Countryside Act 1949 for SA implications.

Environment Act 1995, c.25, London: TSO. [cc]

Summary The Environment Act 1995 established the Environment Agency and the Scottish Environment Protection Agency. It made further provision in relation to National Parks, specifically it created the National Park authorities and altered the purposes and duties of national parks. The Act enabled the designation of Air Quality Management Areas (AQMA) by local authorities and the responsibilities associated with their designation. It also introduced waste producer responsibility and the requirement for the SoS to prepare a national waste strategy for England and Wales.

Implications for Plan The Plan should have due regard to: the purposes and duty of the South Downs National Park; The national waste strategy for England and Wales; and any AQMA designations.

Implications for SA The SA should seek to: promote the purposes and duty of the National Park within the South Downs National Park; pursue the currently national waste strategy for England and Wales; and assess the implications of any AQMA designations in the Plan Area.

Natural Environment and Rural Communities Act 2006, c.16, London: TSO. [14]

Summary In summary this Act: established Natural England, making it responsible for enhancing biodiversity and landscape; established the Commission for Rural Communities which acts as an independent advocate, advisor and watchdog for rural people; and extended the CROW Biodiversity Duty to public bodies and statutory undertakers to ensure due regard to the conservation of biodiversity. This duty is set out in **Section 40** of the Act. Specifically, it states that "Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity". The purpose of the duty is to raise the profile of biodiversity in England and Wales, and to stimulate a cultural change in all parts of the public sector with the intended result

being that biodiversity issues become second nature for public bodies when developing policies and making decisions.

Implications for Plan	Impact upon biodiversity should be taken into account when developing all policies.
Implications for SA	Biodiversity included as part of SA objectives.

Climate Change Act 2008, c.27, London: TSO. [09]

Summary The Act introduces a long term framework for reducing greenhouse gas (GHG) emissions and adapting to the impacts of climate change. The key elements of the Act are: Setting targets and providing a system of carbon budgeting; Creating a committee on climate change; Placing a duty on the government to assess the risk to the UK from the impacts of climate change; Providing powers to establish trading schemes for the purpose of limiting GHG emissions; and, Powers to create waste reduction pilot schemes. It set the following carbon targets: 80% reduction in targeted GHG emissions by 2050 against 1990 baseline; And at least a 26% reduction of targeted GHG emissions by 2020 against 1990 baseline. The 80% target was subsequently amended to 100% by the Climate Change Act 2008 (2050 Target Amendment) Order 2019.

Implications for Plan The Plan should contribute to achieving the UK's carbon targets and address the need to adapt to the impacts of climate change. (100% reduction in targeted GHG emissions by 2050 against 1990 baseline)

Implications for SA SA framework and appraisal should reflect the UK's priorities to reduce greenhouse gas emissions and to adapt to the impacts of climate change. (100% reduction in targeted GHG emissions by 2050 against 1990 baseline)

Conservation of Habitats and Species Regulations 2010, SI 2010/490, London: TSO. [14]

Summary The objective of the Habitats Directive is to protect biodiversity through the conservation of natural habitats and species of wild fauna and flora. The Directive lays down rules for the protection, management and exploitation of such habitats and species.

Chapter 8 of the regulations covers Land Use Planning, including assessment of implications for European sites and European offshore marine sites, considerations of overriding public interest, co-ordination for land use plan prepared by more than one authority, compensatory measures

Implications for Plan The Plan should recognise the contribution the regulations have on habitats and species, and should support it through policy development. Including undertaking Appropriate Assessments where there is likely to be an impact on European designated sites.

Implications for SA The topic of biodiversity should be included as part of SA objectives.

Flood & Water Management Act 2010, c.99, London: TSO. [07, 08]

Summary The Act takes forward a number of recommendations from the Pitt Review into the 2007 floods and places new responsibilities on the Environment Agency and local authorities (among others) to manage the risk of flooding:

The Environment Agency will be required to develop a national strategy for the management of coastal erosion and all sources of flood risk for England.

Lead local flood authorities (unitary and county councils) will be required to develop, maintain, apply and monitor a strategy for local flood risk management in its area. Local flood risk includes surface runoff, groundwater, and ordinary watercourses (including lakes and ponds). Lead local flood authorities will also have a duty to investigate flooding incidents in its area and to maintain a register of structures or features which they consider to have a significant effect on flood risk in their area.

The Act places a duty on a relevant authority to co-operate with other relevant authorities in the exercise of their flood and coastal erosion risk management functions.

The Act establishes a SuDS Approving Body (the "SAB") at county or unitary local authority levels. The SAB would have responsibility for the approval of proposed drainage systems in new developments and redevelopments. Approval must be given before the developer can commence construction and the proposed drainage system would have to meet new national standards for sustainable drainage. The Act will need to be commenced by ministerial order before it comes into effect.

Implications for Plan The Plan should include measures to reduce flood risk and must take into account the Environment Agency's National Strategy.

Implications for SA The SA Framework should include objectives that seek to reduce flood risk.

Localism Act 2011, c.20, London: TSO. [cc]

Summary The Localism Act 2011 introduced a number of new freedoms and flexibilities for local government. In respect of planning the Act introduced three main changes consisting of: the introduction of Neighbourhood Planning; the abolition of regional government and planning; and the introduction of the Duty to Co-operate.

Implications for Plan The Plan will need to give consideration to: existing and future Neighbourhood Plans within and adjacent to the Plan Area; and the Duty to Cooperate.

Implications for SA The SA should consider the effect of Neighbourhood Plans.

Health and Social Care Act 2012, c.7, London: TSO. [01]

Summary The Act introduced a public health system where responsibilities are devolved locally wherever possible, with central government retaining certain aspects including serious unavoidable threats and emergencies, and ensuring that air, food and water meet safety standards. The Act established Public Health England which has responsibilities of the Health Protection Agency

Implications for Plan Improving health must be a key consideration in the work of local government and therefore should be embedded in other areas including planning. The Review should continue to ensure that policies within the Plan must protect and improve health, including tackling health inequalities and promoting equality.

Implications for SA The Public Health Outcomes Framework, which was introduced as a result of the Act and sets high level outcomes and indicators, may be useful for monitoring purposes.

Town and County Planning (Local Planning) (England) Regulations 2012, SI 2012/767, London: TSO. [cc]

Summary The Local Planning Regulations set out the process by which a Local Plan must be prepared.

Implications for Plan	The Plan must be prepared in accordance with the regulations.
Implications for SA	None.

Growth and Infrastructure Act 2013, c.27, London: TSO. [cc]

Summary	This Act introduced a number of measures and altered a number of existing arrangements. Of relevance to plan making was the alteration of the prior approval system and giving mineral planning authorities in England greater local discretion over whether review of minerals permissions are required and when they take place.
Implications for Plan	Consideration should be given to the potential impact of development occurring via prior-notification which may not have considered the impact of existing and proposed nearby waste and minerals development.
Implications for SA	None.

Town and County Planning (General Permitted Development) (England) Order 2015 (as amended), SI 2015/596, London: TSO. [cc]

Summary	The General Permitted Development Order (GDPO) permits certain types of development under certain circumstances, subject to the conditions set out in the order. It also includes provision for certain types of development to be permitted subject to a prior notification process.
Implications for Plan	Under the prior notification system it is possible to convert small industrial units to residential properties, which circumvents the existing safeguarding and consultation methods, and has the potential to result in residential properties near to waste management or minerals operations. This may have an impact on suitable land for waste management and minerals operations. The Plan may need to give consideration to this phenomenon.
Implications for SA	The SA should make allowance for development considered to be permitted under this order.

Housing and Planning Act 2016, c.27, London: TSO. [cc]

Summary	The Act makes a number of provisions of including: a number of minor amendments to the neighbourhood planning process, which give the SoS the power to intervene, but the key concepts remain unchanged; powers for the SoS to intervene in plan making including the ability to provide directions to examiners of development plan documents, to direct amendments to a Local Development Scheme, and to prepare or revise a development plan document where a local authority is failing to do so; provisions for the concept of 'permission in principle', subject to further regulations; and provisions were for local planning authorities to keep register of particular kinds of land, which is the basis of the Brownfield Register.
Implications for Plan	The Plan will need to give consideration to existing and proposed neighbourhood plans and should have an awareness of any land registers that may exist under the provisions.
Implications for SA	The SA should include a list of current and proposed neighbourhood plans and land registers.

Neighbourhood Planning Act 2017, c.20, London: TSO. [cc]

Summary	<p>The Act makes a number of provisions including: further amendments to neighbourhood planning, specifically in relation to the status of 'made' plans, modifications to neighbourhood plans, and alterations to neighbourhood areas; alterations to existing provisions for local development documents, including (S8) specifying content of development plan documents; (S9) powers to direct preparation of joint plans, (S11) the format for local development schemes and document, the (S12) period of review for development documents and (S13) which allows the SoS to prescribe by the content of Statements of Community Involvement by regulation.</p> <p>Only part of this act has been commenced.</p>
Implications for Plan	The Plan will need to be prepared in accordance with the current regulations. It is recommended that the Plan be prepared in accordance with Section 8 (content of local development plan document), even though this has not been commenced at this time.
Implications for SA	None.

European Union (Withdrawal) Act 2018, c.16, London: TSO. [cc]

Summary	The Act makes provision for the United Kingdom to leave the European Union on the date set out in the Act. Its purpose is to ensure there is not a legal vacuum by enshrining then entirety of EU law into UK law on the date of leaving the European Union.
Implications for Plan	European Union law is and will remain relevant to the preparation of the Plan, even after United Kingdom leaves the European Union.
Implications for SA	European Union law is and will remain relevant to the SA, even after the United Kingdom leaves the European Union.

Documents

Adur & Worthing Councils and Brighton & Hove City Council (2019) Shoreham Harbour Joint Area Action Plan. [05]

Summary	<p>The Shoreham Harbour Joint Area Action Plan (JAAP) is a strategy for the regeneration of Shoreham Harbour and surrounding areas. It includes proposals and policies for new housing and employment generating floor space; and for upgraded flood defences, recreational and community facilities, sustainable travel, environmental and green infrastructure improvements.</p> <p>The JAAP has nine objectives. In summary the titles of these objectives are: 1. Climate change, energy and sustainable building; 2. Shoreham Port; 3. Economy and employment; 4. Housing and community; 5. Sustainable travel; 6. Flood risk and sustainable drainage; 7. Natural environment, biodiversity and green infrastructure; 8. Recreation and leisure; and 9. Place making and design quality.</p>
Implications for Plan	Shoreham Harbour hosts a number of minerals operations. The Plan should be informed by the proposals contained within the JAAP. The provision of capacity for minerals imports at the Harbour and the proposals in the JAAP will need to be reconciled.
Implications for SA	The SA objectives should support the objectives of the JAAP.

Adur District Council (2005) Adur District Council AQMA. [10]

Summary There are two AQMAs designated in Adur:

A27 Upper Brighton Road, Worthing; and High Street (A259), Shoreham-by-Sea and Old Shoreham Road (A270), Southwick. The Council has developed Action Plans aimed at reducing levels of nitrogen dioxide in these areas. Annual monitoring has also been undertaken.

Implications for Plan Both AQMAs are close to the plan boundary. During the Plans preparation consideration should be given to the impacts of activities which would further the already exceeded air pollution levels.

Implications for SA The SA should consider the location of the AQMAs and whether the transportation of waste and minerals would have a negative impact on the surrounding air quality.

Adur District Council (2017) Adur Local Plan. [cc]

Summary The Adur Local Plan provides a strategy for development in Adur up to 2031. It seeks to achieve a balance in meeting needs for development û such as housing, employment, retail and community facilities, while striving to protect and enhance the character and features of Adur which so many people value û its open spaces, landscape and historic features. The Plan sets out a vision and strategy and looks at the planning issues the area is facing, and proposes policies for addressing them. The district of Adur is located to the West of Brighton & Hove. Shoreham Port straddles the two authorities'.

The Plan was adopted on 14 December 2017.

Implications for Plan The Plan authors should be aware of the proposals for the Shoreham area in the Adur Local Plan. Consideration should, where appropriate, be given to how proposals within the Plan will affect the ambitions of Adur Local Plan. Discussions under the Duty to Co-operate may be appropriate.

Implications for SA None.

Adur District Council et al. (2016) Statement of Common Ground between the Shoreham Harbour Planning Authorities and the Shoreham Port Authority. [05]

Summary The Shoreham Harbour Statement of Common Ground (SoCG) seeks to underpin effective cooperation and collaboration between the parties listed above in addressing strategic cross-boundary issues as they relate to planning for minerals infrastructure and safeguarding in Shoreham Harbour. It sets out matters of agreement and commitment to a future policy approach, reflecting the spirit of co-operation between the parties to the Statement. The Statement sets out the current evidence available to the parties at the time of preparation, the evidence will continue to build upon this evidence through the development of emerging Local Plans.

The Statement has the following broad aims: to set out the commitment of each of the parties to an approach to mineral safeguarding in line with NPPF at Shoreham Harbour, recognising commercial considerations of the Port and the regeneration aspirations of the Shoreham Harbour Joint Area Action Plan (JAAP); to indicate the approach to be taken by all parties to delivering this commitment. And, to replace

the previous Statement of Common Ground dated April 2014.

The signatories of the SoCG are: Adur District Council; Brighton & Hove City Council; East Sussex County Council; West Sussex County Council; the South Downs National Park Authority; and Shoreham Port Authority.

The JAAP has been informed by the SoCG.

Implications for Plan The Plan authors should be aware of the SoCG.

Implications for SA None.

British Marine Aggregate Producers Association (BMAPA) and The Crown Estate (2017) *Good Practice Guidance Extraction by Dredging of Aggregates from England's Seabed*. [05]

Summary This good practice guidance has been produced by the British Marine Aggregate Producers Association and The Crown Estate as a replacement for the original Marine Minerals Guidance 1: Extraction by dredging from the English seabed, which was originally published in July 2002 by the Office of the Deputy Prime Minister (now Department for Communities and Local Government) but subsequently withdrawn. The present document provides an overview of the marine aggregate industry, for all stakeholders, on the ways in which it works, and the planning, licensing, environmental assessment, monitoring, mitigation and management methods that are employed to protect the environment and other seabed interests and to ensure the sustainability of the industry.

Implications for Plan This document provides background as to mineral extraction from the seabed. Plan may wish to make reference to this.

Implications for SA None.

Bracknell Forest Council et al. (2017) *Statement of Common Ground on Soft Sand Supply in the South East (Draft v4)*. [05]

Summary The purpose of this Statement of Common Ground is to underpin effective cooperation and collaboration between the minerals planning authorities of the South East of England in addressing the strategic cross-boundary matter of soft sand supply. It sets out matters of agreement, reflecting the spirit of co-operation between the Parties to the Statement of Common Ground. It has been signed by most of the Mineral Planning Authorities in the South East of England, but not all. Aside from an agreement to monitor the supply and demand of soft sand, the Statement commits the signatories to four actions and activities, these are: The Parties to this statement will continue to share knowledge and information relevant to strategic cross-boundary issues relating to planning for the supply of soft sand including the matters set out in the Agreement in Section 7; The Parties will seek to ensure that the matters in the statement are reflected in the minerals local plans that they prepare (including, in the case of unitary authorities, any local plans that include minerals policies); The Parties will take account of the matters in the statement in the consideration of planning applications for soft sand supply; The Parties will continue to liaise with each other on how soft sand supplies to meet the needs of the South East can be maintained.

The Statement of Common Ground is for a three-year period from 2017 and will be reviewed and refreshed as appropriate during 2020. East Sussex County Council, the South Downs National Park Authority and Brighton & Hove City Council are all

signatories to the Statement.

Implications for Plan The Plan will need to be prepared in accordance with the actions and activities set out in the Statement.

Implications for SA None.

Brighton & Hove City Council (2005) *Brighton & Hove Local Plan (2005) (SAVED POLICIES)*. [cc]

Summary The majority of this Plan was replaced by the City Plan - Part 1.

The Vision of this plan is for a "A cosmopolitan, successful city by the sea where people have a high quality of life in a decent environment." It contains for key relevant objectives. These are: to make the link between land use and transport, reducing need to travel; to minimise environmental impacts and conserve, sustain and enhance environmental assets and resources; to minimise the use of non-renewable resources and the production of waste, whilst maximising energy efficiency and promoting renewable sources of energy; and to maintain and enhance the natural environment, the Sussex Downs AONB and built heritage.

Relevant Policies

EM12 Shoreham Harbour û mixed uses - Planning permission will be granted for temporary Port related development and buildings for existing industrial users prior to the construction of a transport link provided they do not add to the environmental disadvantages suffered as a result of Heavy Goods Vehicle (HGV) traffic passing along the roads used for Port access.

Nature Conservation Policies NC1-4+6 - Planning permission will not be granted for proposals within or in the setting of an existing or proposed site of international/ European/national importance/Local Nature Reserves (LNR)s/Site of Nature Conservation Interest (SNCI)s/Regionally Important Geological Sites (RIGS)/countryside/ downland where it is likely to have an adverse impact, directly or indirectly, on the nature conservation features of the site. Exceptions will be made in certain circumstances.

Implications for Plan The Plan will need to consider: the wider environmental benefits of renewable energy installations balanced against local impacts; and the environmental impacts of waste and minerals transportation.

Implications for SA The SA: should take into account policies on sustainability and environmental issues which elaborate on national guidance; and could include objectives on protecting and enhancing the environment as well as achieving economic prosperity and social equity.

Brighton & Hove City Council (2010) *Brighton & Hove Municipal Waste Management Strategy*. [03, 04]

Summary The objectives of this strategy are to: reduce the overall volume of household waste generated and maximise re-use, recycling and recovery of the waste that is produced; send as little waste as possible to landfill; ensure compliance with all legal requirements relevant to waste management, and enforce these fairly and consistently; protect the environment and enhance its quality locally; and improve our service to residents and our engagement with residents and businesses while ensuring services continue to improve and represent value for money for council tax payers.

It contains a number of policies, these are: 1. Service quality and engagement with residents, businesses and communities; 2. Waste minimisation and prevention; 3. Increasing rates of re-use; 4. Increasing recycling rates; 5. Increasing composting rates; 6. Residual waste; 7. Waste from businesses and other organisations; And contains the following targets: **Recycling and Composting** : 2007/08 = 28.5%, 2020/21 = 45%; **Energy Recovery** : 2007/08 = 11%, 2020/21 = 53%; and **Landfill** : 2007/08 = 60.6%, 2020/21 = 2%.

Implications
for Plan
Implications
for SA

The Plan should reflect the objectives and aims set out within the strategy.
The objectives of the strategy should be reflected within the objective of the SA.

Brighton & Hove City Council (2012) *Brighton & Hove Local Biodiversity Action Plan, The*. [14]

Summary

The LBAP addresses the species and the habitats of particular importance in Brighton & Hove. It includes action plans covering 18 species or groups of species which are considered to have specialist requirements which can be addressed locally and which cannot be adequately addressed through local habitat action plans and 15 actions plans covering habitats of greatest importance locally. The LBAP sets of 5 principles which take into account the goals on Biological Diversity Strategic Plan 2011-2020 and outcomes of the 2011 England Biodiversity Strategy: 1. Mainstream Biodiversity in Society; 2. Integrate the conservation of biodiversity across other land uses; 3. Conserve important habitats and species on a landscape scale; 4. Share the benefits of biodiversity and ecosystem services; and 5. Establish a strong evidence base.

Implications
for Plan

The Plan should support the aims of this action plan and take into account the species and habitats for which there are action plans when assessing suitability of sites.

Implications
for SA

The SA should consider inclusion of objectives to protect and enhance biodiversity. Indicators and targets relating to biodiversity could be linked to the targets set in the local BAP.

Brighton & Hove City Council (2013) *Brighton & Hove AQMA 2013*. [10]

Summary

The council declared a new AQMA in August 2013, which is quarter of the size of the previous one which encompassed much of southern central Brighton & Hove. Broadly speaking, the AQMA covers much of the seafront, some key roads heading back from the seafront into the city and part of the city centre. The council is developing a renewed 2014 air quality action plan targeting this area. Levels of nitrogen dioxide exceed Air Quality Objectives in the AQMA, and this is associated mainly with road traffic. Since the designation an action plan (2015) has been prepared and monitoring has taken place on an annual basis.

Implications
for Plan

The Plan should consider impacts and avoid developments and activities which would further the already exceeded air pollution levels.

Implications
for SA

The SA should consider the location of the AQMAs and whether the transportation of waste and minerals would have a negative impact on the surrounding air quality.

Peter Brett Associates for Brighton & Hove City Council (BHCC) and Brighton & Hove Economic Partnership (2013) *Brighton & Hove Economic Strategy (2013-2018)*. [16, 17]

Summary The strategy focuses on how the city can adopt measures that lead to a sustainable economy for the period 2013 to 2018. It contains the following strategic objectives: SO1 - To enhance Brighton & Hove's distinctive destination and lifestyle offer; SO2 - To grow quality jobs and business opportunities in higher value and low carbon sectors; SO3 - To better align jobs skills to projected needs and in support of higher value sectors; SO4 - To tackle barriers to employment and to create employment opportunities for all; SO5 - To establish a strong and influential Greater Brighton City Region.

Implications for Plan The Plan should avoid conflict with the objectives of the strategy.

Implications for SA The SA should account for the ambitions of the strategy within the SA objectives.

Brighton & Hove City Council (2014) *Brighton and Hove Sustainable Community Strategy: Creating the City of Opportunities*. [cc]

Summary The strategy aims to improve the economic, social and environmental well-being of Brighton and Hove. It contains five key priority areas: Economy; Children & Young People; Health & Wellbeing; Community Safety and Resilience; and Environmental Sustainability.

Implications for Plan The Plan should consider the Biosphere Designation which is supported under the strategies environmental priority.

Implications for SA The SA should consider reflecting those priorities identified.

Brighton & Hove City Council (2015) *Brighton & Hove Local Flood Risk Management Strategy*. [07, 08]

Summary This Brighton & Hove Local Flood Risk Management Strategy sets out Brighton & Hove City Council's (BHCC) strategy for local flood risk management. It was prepared in accordance with the requirements of the Flood and Water Management Act 2010. The BHCC Local Strategy aims to; raise awareness of existing flood risk issues; provide an overview of the proposed flood risk mitigation work; and set out the long term strategy for flood risk management. It establishes the priorities for managing local flood risk and identify how BHCC will work together with other Risk Management Authorities, stakeholders, and local communities to manage and mitigate local flood risk, where possible.

Implications for Plan The Plan should address all types of flood risk by policy and as far as practicable follow the recommendations of Strategic Flood Risk Assessment which this document will feed into.

Implications for SA The SA should consider all forms of flood risk within its objectives and when recommending mitigation refer to the strategy.

Brighton & Hove City Council (2015) *Local Transport Plan 2015*. [11]

Summary This LTP4 consists of a long-term Strategy to 2030 and a short term 4-year Delivery Plan (2015/16 û 2018/19) that explain how the council proposes to help achieve the city's planned growth and contribute towards wider objectives in other plans and strategies. It replaces LTP3 (2011). It is based on the following broad objectives: Grow the Economy Sustainably; Reduce Carbon Emissions; Increase Safety & Security; Provide Equality, Mobility & Accessibility; Improve Health & Well-being; Enhance the Public Realm; and Encourage Respect & Responsibility. It also contains

a number of specific proposed developments.

Implications for Plan	The Plan should not conflict with and where possible support the ambitions of the transport plan.
Implications for SA	The SA should include objectives that support transition to a low carbon economy, reduce carbon emissions, improving road safety, and improve accessibility and mobility.

Brighton & Hove City Council (2015) *Brighton & Hove Statement of Community Involvement*. [cc]

Summary	The SCI sets out the minimum requirements for community involvement and consultation on the planning documents that form the new Local Development Framework; to enable the local community to say what sort of place they want to live in at a stage when this can make a significant difference.
Implications for Plan	The Plan must meet and try to exceed the requirements for formal consultation set out in the Town and Country Planning (Local Planning) (England) Regulations 2012.
Implications for SA	Consultations on the SA should fulfil community involvement requirements in the SCI.

Brighton & Hove City Council (2015) *Brighton & Hove Sustainability Action Plan*. [cc]

Summary	<p>The overarching goal of the Action Plan is to ensure that the city can live within its ecological means. Ecological Footprint is used as the headline sustainability indicator for the city.</p> <p>The Action Plan builds upon the One Planet Framework and sets specific objectives and targets for each of the following themes: Zero Carbon, Zero Waste, Sustainable Transport, Sustainable Materials, Local and Sustainable Food, Sustainable Water, Land Use and Wildlife, Culture and Community, Equity and Local Economy, and Health & Happiness. Targets relating to waste reduction include: By 2025, 70% of domestic waste by weight will be reclaimed, recycled or composted; Residual household waste will reduce by 10% per household. By 2025, no more 2% of waste will be sent to landfill; And, to develop the infrastructure to enable recycling of commercial waste.</p>
Implications for Plan	The Plan should build on the key objectives of the Action Plan, particularly the targets relating to waste reduction.
Implications for SA	The SA Framework should reflect the priorities identified and the One Planet approach.

Brighton & Hove City Council (2016) *Brighton & Hove City Plan Part One*. [cc]

Summary	The City Plan Part 1 sets out 23 strategic objectives in the following four themes: Strong and Prosperous City; A Sustainable City; An Attractive City; and Healthy and Balanced Communities. It aims to achieve the strategic objectives through delivery of the spatial strategy and the Development Area, Special Area and Citywide policies set out in the Plan. The vision of the Plan is as follows: "By 2030 Brighton & Hove will have sustainable, resilient low carbon economy with jobs at all levels. Local residents will have the skills to enable them to progress and live successfully in the city. New housing will be provided. The city will have made significant progress to
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becoming a resource efficient One Planet, Zero Carbon city, and be a city adapting well to climate change. The city will remain a safe and healthy place for residents, business and visitors alike with a high quality built environment and protected natural environment. Everyone has a right to a decent home, a good education, a job that pays a decent standard of living, good healthcare and to feel safe in their community. No one should be disadvantaged due to the neighbourhood they are born into."

Implications for Plan The Plan should be informed by the ambitions of the City Plan.

Implications for SA The SA objectives should reflect and not conflict with the plans objectives.

Brighton & Hove City Council (2018) *Brighton & Hove City Plan Part Two (Draft)*. [cc]

Summary The role of the City Plan Part Two is to support the implementation and delivery of City Plan Part One; to build on the strategic policy framework; to identify and allocate additional development sites and to set out a detailed development management policy framework to assist in the determination of planning applications.

It contains development management policies and strategic site specific allocations.

The Draft Plan has been subject to a Regulation 18 consultation; a Proposed Submission Consultation is anticipated in the first half of 2020.

Implications for Plan The Plan should be informed by the ambitions of the City Plan.

Implications for SA The SA objectives should reflect and not conflict with the plans objectives.

Brighton & Hove City Council, East Sussex County Council and West Sussex County Council (2013) *Air quality and emissions mitigation guidance for Sussex authorities*. [02]

Summary Air quality and Emissions Mitigation Guidance for Sussex Authorities was developed in response to the changes in national planning policy, through the National Planning Policy Framework (NPPF). It was developed by members of the Sussex Air Quality Partnership (Sussex-air). The guidance supports the principles of the partnership to improve air quality across Sussex and encourage emissions reductions to improve the environment and health of the population. The purpose of the guidance is to: Provide a Sussex-wide approach for assessing potential air quality impacts from development and transport related emissions and provide a consistent approach to mitigating those impacts. And, to provide technical advice to local planning authorities on how to deal with planning applications that could have an impact on air quality.

Implications for Plan The Plan authors may wish to consider incorporating or citing the guidance in the Plan, if it does not do so already.

Implications for SA The Advice Document provides an appropriate source of guidance in the event the SA recommends mitigation in relation to air quality.

Brighton & Hove City Council, East Sussex County Council and West Sussex County Council (2013) *Planning Noise Advice Document: Sussex*. [02]

Summary The Planning Noise Advice Document provides advice for developers and their

consultants when making a planning application in East and West Sussex. The document seeks to complement the Noise Policy Aims set out in the Noise Policy Statement for England (2010), namely to: avoid significant adverse impacts on health and quality of life; mitigate and minimise adverse impacts on health and quality of life; and where possible, contribute to the improvement of health and quality of life. It is an advice / good practice document.

Implications for Plan	The Plan authors may wish to consider incorporating or citing the guidance in the Plan, if it does not do so already.
Implications for SA	The Advice Document provides an appropriate source of guidance in the event the SA recommends mitigation in relation to noise.

Wrighton, C E, McEvoy, F M and Bust, R (2011) Mineral Safeguarding in England: Good Practice Advice (British Geological Survey Open Report OR/11/046). [05]

Summary	<p>In the past there have been many instances where mineral resources have been needlessly sterilised by non-mineral development. MPAs must now set out Mineral Safeguarding Areas and Mineral Consultation Areas.</p> <p>The guidance puts forward a methodology for determining MSAs, together with policies through which they would have effect. Steps are as follows: 1. Assess what is the best geological and resource information for the authority area; 2. Decide which minerals in the area need to be safeguarded and decide the physical extent of the safeguarded area; 3. Consult on proposed MSA; 4. Decide on approach to safeguarding for Core Strategy / Local Plan; 5. Include mineral assessments in local lists of information requirements; 6. Include safeguarding at district level DPDs; 7. Include development management policies in a DPD;</p>
Implications for Plan	The Plan will need to take on board the guidance to ensure that resources are safeguarded and sterilization is avoided. In particular the Review should consider the steps suggested for identifying MSAs (and MCAs) and include them where relevant.
Implications for SA	SA objectives should include the effective safeguarding of mineral resources. SA indicators should include an assessment of the impact on mineral resources.

Coast to Capital Local Enterprise Partnership (2014) Strategic Economic Plan. [16, 17]

Summary	<p>The Strategic Economic Plan sets out the priorities for the Coast to Capital Local Enterprise Partnership. It proposes a new six year programme of investment in business related infrastructure including transport and flood defences, and delivery of extra measures to deliver vigorous business growth, backed by the necessary investment in additional housing and communities. The Strategic Economic Plan includes all the key priorities from the Greater Brighton City Deal, the European Structural Investment Funds Strategy and our Skills Strategy. Projects of particular relevance include: the promotion of the Newhaven Enterprise Zone.</p>
Implications for Plan	The Plan should complement and not conflict with the Strategic Economic Plan.
Implications for SA	None.

Council of the European Union (2012) European Thematic Strategy for Soil

Protection. [12]

Summary The Thematic Strategy for Soil Protection consists of a Communication from the Commission to the other European Institutions, a proposal for a framework Directive (a European law), and an Impact Assessment. The Communication (COM(2006) 231) sets the frame. It explains why further action is needed to ensure a high level of soil protection, sets the overall objective of the Strategy and explains what kind of measures must be taken. It establishes a ten-year work program for the European Commission. The proposal for a framework Directive (COM(2006) 232) sets out common principles for protecting soils across the EU. Within this common framework, the EU Member States will be in a position to decide how best to protect soil and how use it in a sustainable way in their own territory.

A proposed soils directive was withdrawn in 2014, but member states have continued to progress policies that protect soil.

Implications for Plan The Plan should consider impact on soil when developing policies. Protect soil functions and prevent contamination to soils. Where possible restore contaminated soils.

Implications for SA The SA framework should include objectives to conserve and enhance important soil functions and restore contaminated soils.

Department for Communities and Local Government (2012) Planning practice guidance. [cc]

Summary Planning Practice Guidance supports the National Planning Policy Framework which sets out the Government's planning policies for England and how these are expected to be applied. It is periodically updated, and waste last updated 1 November 2019

Implications for Plan The Plan should be prepared in accordance with Planning Practice Guidance.

Implications for SA None.

Department for Communities and Local Government (2017) Housing White Paper - Fixing our broken housing market (Cm 9352). [cc]

Summary The Government has identified that there has been and continues to be an undersupply of housing provision. The white paper proposes a number of programmes and alterations to policy under four broad headings: 1. Planning for the right homes in the right places; 2. Building homes faster; 3. Diversifying the market; 4. Helping people now. It promotes a number of policy changes and programmes to increase the supply of housing and access to housing, in particular by young people.

Implications for Plan The proposed programmes and policy changes, such as the proposed standardisation of the housing calculation, provision of infrastructure will have an indirect impact on the WMLP through greater demand on waste management and minerals provision. It may also alter the land available for such development. However, until specific changes are announced it will be hard to assess the impact on the WMLP. Consequently, the authors of the Plan should be aware of the content of the white paper and the intentions of the Government.

Implications for SA None.

Department for Business, Energy & Industrial Strategy (2017) Industrial

Strategy White Paper: building a Britain fit for the future. [cc]

Summary	<p>The Industrial Strategy sets out how the Government intends to build a Britain fit for the future û how it will help businesses create better, higher-paying jobs in every part of the United Kingdom with investment in the skills, industries and infrastructure of the future. The Strategy ensures that Britain and its citizens can embrace and benefit from the opportunity of technological change. It focuses on five topics or "foundations of productivity". These are: Ideas - the world's most innovative economy; People - good jobs and greater earning power for all; Infrastructure - a major upgrade to the UK's infrastructure; Business Environment - the best place to start and grow a business; And, Places - prosperous communities across the UK. The majority, if not all, of the projects cited in the Strategy have been previously announced, with topics including: research, teaching, infrastructure, electric vehicles, cyber security, high speed rail, innovation in construction, AI, and big data.</p> <p>Most the projects either have no relevance or are only indirectly relevant to the Plan. It does, however, make reference to the Circular Economy on page 148 and indicates that the Government intends to publish a resources and waste strategy in 2018. It is also indicated that Local Industrial Strategies will be prepared, but it is unclear who will be responsible for this.</p> <p>The aggregates / minerals sector is not mentioned in the document. The document is 259 pages in length.</p>
Implications for Plan	Plan authors should be aware of Government intentions.
Implications for SA	Authors to be aware of future Local Industrial Strategies.

DEFRA (2004) Review of Environmental and Health Effects of Waste Management: Municipal Solid Waste and Similar Wastes. [01]

Summary	<p>The Prime Minister's Strategy Unit, in its report "Waste not, Want not", recommended that an independent body should bring together the literature and evidence on the relative health and environmental effects of all the different waste management options.</p> <p>The subsequent review examines the waste management options for treating municipal solid and similar waste. It focuses on the principal types of facilities that are currently used for dealing with such waste in the UK and in Europe and on what the currently available scientific evidence can tell us about their environmental and health effects.</p> <p>Main Objectives: The report's conclusion is that on the evidence from studies so far, the treatment of municipal solid waste has at most a minor effect on health particularly when compared with other health risks associated with ordinary day to day living. Among the other conclusions to be drawn, the report shows that risks to human health from incineration are small in comparison with other known risks, and acknowledges the role of incineration with energy recovery as a sustainable waste management option although the priority must be waste minimisation, reuse and recycling.</p> <p>Broad Relevant Aims: The report provides local authorities with a summary of the current evidence base to guide and support the task of approving planning applications for new waste management facilities.</p>
Implications for Plan	The review provides a summary of the available evidence base and details the regulatory framework governing the design and operation of waste management

facilities currently in practice in the UK and Europe. The overall conclusion is that well run facilities, run to strict environmental standards do not constitute a significant risk to health. The Plan should follow the waste management hierarchy of reduce, reuse and recycle and where appropriate apply the evidence base encapsulated in the review to inform strategic decision making. Where appropriate, the Plan team will consult with Public Health England or refer to current position statements on waste management.

Implications for SA The SA should provide environmental criteria to both meet the needs of communities and protect health. Where appropriate, the SA should identify projects that may require further investigation as to both perceived and actual risk to health.

Department for Environment, Food & Rural Affairs (2005) *The UK Government Sustainable Development Strategy (Cm.6467)*. [cc]

Summary The Strategy aims to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations. It contains four priorities: Sustainable consumption and production; Natural resource protection; Sustainable Communities; and Climate change and energy. These priorities are based on four principles: Living within environmental limits; Ensuring a strong, healthy and just society; Achieving a sustainable economy; Promoting good governance; And using sound science responsibly.

Implications for Plan The Plan should support and promote sustainable development principles and priorities by: Reducing resource consumption; Reducing waste transportation (proximity principle); Reducing environmental degradation; and encouraging community involvement in waste.

Implications for SA The SA should consider the priorities and principles in the development of objectives and indicators.

Department for Environment, Food and Rural Affairs (2006) *Climate Change: The UK Programme (CM 6764)*. [09]

Summary This outlines the UK Government's climate change programme which is designed to ensure that UK emissions remain on a downward path and to prepare the UK for making bigger cuts in the future. It includes details of the Governments strategic approach to tackling emissions for each sector. The review assesses the impact of existing policies and potential contribution of new policy options to achieve the domestic goal of reducing carbon dioxide emissions by 20% below 1990 levels by 2010 and 60% by 2050. It also includes information and details of European and national targets, on energy from waste and waste management.

Implications for Plan Plan should reflect objectives and targets identified in the UK Climate Change programme and promote reduction of greenhouse gases.

Implications for SA Contribution to reduction in emissions should form part of the SA/SEA monitoring regime for plans. Inclusion of objective and indicator relating to reduction of CO2 emissions

Department for Environment, Food and Rural Affairs (2007) *Air Quality Strategy for England, Scotland, Wales and Northern Ireland*. [10]

Summary The Strategy sets out air quality objectives and policy options to further improve air

quality in the UK from today into the long term. The primary objective is to ensure that all citizens should have access to outdoor air without significant risk to their health, where this is economically and technically feasible. The objectives in the strategy are policy targets/intentions that are expressed as a maximum ambient concentration not to be exceeded. It adopts an "exposure reduction" approach for PM2.5. This is based on the principle that levels of pollutants with low or zero thresholds for adverse effects should be reduced across the whole population of an urban area or region rather than in a small area or "hotspot". This is to be delivered by setting air quality objectives/limit values to ensure some basic level or quality of air which all citizens should experience; and an objective based on reducing average exposures across the most heavily populated areas of the country.

Implications for Plan	There is no legal requirement to meet the policy targets/intentions in the strategy. However, many of them mirror European obligations which are legally binding. The Environment Agency is responsible for regulating emissions from waste and minerals processes. However, the Plan should have regard to the objectives set out in the strategy to ensure that waste and minerals policy does not lead to development that exceeds the maximum ambient concentrations of air pollutants (Table 2 of the strategy).
Implications for SA	The SA should reflect the approach of reducing air pollution levels across the whole population of an urban area or region. This is because there is no recognised safe level for exposure to fine particles (PM2.5).

DEFRA (2007) *Waste Strategy for England*. [03, 04]

Summary	<p>The strategy aims to move waste up the waste hierarchy. Targets for municipal waste are: Recycling & composting: 2010:40%; 2015:45%; and 2020:50%. For commercial and industrial waste, target to reduce waste sent to landfill by 20% by 2010 (compared to 2004 levels). For construction and demolition waste, target to halve waste going to landfill by 2012.</p> <p>The strategy identifies: energy from waste as essential component of a well-balanced energy policy; that a waste infrastructure delivery programme will provide support to LPAs through PFI and other sources; a preference for treating food waste using anaerobic digestion; and highlights need for culture change and consumer and producer responsibility.</p>
Implications for Plan	The WMLP should support strategy aims to move waste up the waste hierarchy and reducing waste sent to landfill.
Implications for SA	The SA framework should reflect the priorities identified in the Strategy for reducing waste sent to landfill, and for increasing recycling/composting rates.

Department for Environment, Food and Rural Affairs (2008) *Future Water: The Government's water strategy for England (Cm 7319)*. [06]

Summary	The strategy sets out Government's overall vision and key priorities for water. The vision includes: improved quality of our water environment; sustainably managed risks from flooding and coastal erosion; sustainable use of water resources; cutting greenhouse gas emissions; and continuous adaptation to climate change.
Implications for Plan	Plan should include measures which support and contribute to achieving the strategy's vision and key priorities.
Implications for SA	SA should incorporate priorities into SA framework.

Department of Environment, Food & Rural Affairs (2010) English national parks and the broads: UK government vision and circular 2010. [13]

Summary Sets a vision for National Parks, and that by 2030, English National Parks will be places where: there are thriving, living, working landscapes; they inspire visitors and inhabitants to live within environmental limits; the range of services they provide are valued; sustainable development can be seen in action; wildlife flourishes and habitats are maintained, restored, and expanded; and everyone can discover the rich variety of England's natural and historic environment.

Implications for Plan Plan should support the vision for the SDNP. Key considerations include conservation and enhancement of natural beauty, wildlife and cultural heritage of SDNP and promotion of opportunities of understanding and enjoyment of the SDNP by the public.

Implications for SA The SA objectives should complement the aims set in the SDNP Strategy and Action Plan.

Department for Environment, Food & Rural Affairs (2010) Noise Policy Statement for England. [02]

Summary This sets out the Government's strategy for addressing noise pollution in England. The aims include: To avoid significant adverse impacts on health and quality of life; to mitigate and minimise adverse impacts on health and quality of life; and where possible, to contribute to the improvement of health and quality of life; and, the application of the Noise Policy Statement should mean that noise is properly taken into account at the appropriate time. The application of the NPS should also ensure that noise is considered in alongside other issues and not in isolation.

Also, see Natural Environment White Paper - re: designation of space as "quiet open space".

Implications for Plan Ensure that noise implications are taken into account when siting new development. The cumulative impact of noise should also be taken into consideration. This should consider not only the existing sources of noise but any combined impact sourced from a number of proposed sites in one area.

Also, noise as a secondary impact (e.g. from increased traffic) should also be considered. Health policy should ensure assessment of noise takes place as part of any major scheme.

Implications for SA Noise impacts should be considered in the SA and could be included within an objective relating to health. SA should include a noise indicator.

Department of Environment, Food and Rural Affairs (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services. [14]

Summary This strategy builds on the Natural Environment White Paper and provides a comprehensive picture of how the Government intend on implementing their international and EU commitments. It sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes) and at sea. The main aims of the strategy are to: Halt overall biodiversity loss, Support healthy well-functioning ecosystems, and Establish coherent ecological networks with more and better places for nature for the benefit of wildlife and people.

Implications for Plan	The Plan should promote protection and enhancement of biodiversity.
Implications for SA	The SA should consider inclusion of objectives to protect and, where possible, enhance biodiversity.

Department of Environment, Food and Rural Affairs (2011) Marine Policy Statement. [cc]

Summary The UK vision for the marine environment is for 'clean, healthy, safe, productive and biologically diverse oceans and seas'. The Policy Statement seeks to achieve the following objectives:

Achieving a sustainable marine economy: Infrastructure is in place to support and promote safe, profitable and efficient marine businesses; The marine environment and its resources are used to maximise sustainable activity, prosperity and opportunities for all, now and in the future; Marine businesses are taking long-term strategic decisions and managing risks effectively; They are competitive and operating efficiently; Marine businesses are acting in a way which respects environmental limits and is socially responsible. This is rewarded in the marketplace.

Ensuring a strong, healthy and just society: People appreciate the diversity of the marine environment, its seascapes, its natural and cultural heritage and its resources and act responsibly; The use of the marine environment is benefiting society as a whole, contributing to resilient and cohesive communities that can adapt to coastal erosion and flood risk, as well as contributing to physical and mental wellbeing; The coast, seas, oceans and their resources are safe to use; The marine environment plays an important role in mitigating climate change; There is equitable access for those who want to use and enjoy the coast, seas and their wide range of resources and assets and recognition that for some island and peripheral communities the sea plays a significant role in their community; Use of the marine environment will recognise, and integrate with, defence priorities, including the strengthening of international peace and stability and the defence of the UK and its interests.

Living within environmental limits: Biodiversity is protected, conserved and where appropriate recovered and loss has been halted; Healthy marine and coastal habitats occur across their natural communities and the functioning of healthy, resilient and adaptable marine ecosystems; our oceans support viable populations of representative, rare, vulnerable, and valued species.

Promoting good governance: All those who have a stake in the marine environment have an input into associated decision-making; Marine, land and water management mechanisms are responsive and work effectively together, for example through integrated coastal zone management and river basin management plans; Marine management in the UK takes account of different management systems that are in place because of administrative, political or international boundaries; Marine businesses are subject to clear, timely, proportionate and, where appropriate, planned regulation; The use of the marine environment is spatially planned where appropriate and based on an ecosystems approach which takes account of climate change and recognises the protection and management needs of marine cultural heritage according to its significance.

Using sound science responsibly: Our understanding of the marine environment continues to develop through new scientific and socio-economic research and data collection; Sound evidence and monitoring underpins effective marine management

and policy development; And the precautionary principle is applied consistently in accordance with the UK Government and Devolved Administrations' sustainable policy.

Implications for Plan Impact upon the marine environment should be taken into consideration when developing development plan policies.

Implications for SA The SA framework should consider the inclusion of objectives around marine issues.

Department of Environment, Food & Rural Affairs (2011) *Safeguarding our soils: A strategy for England*. [12]

Summary This sets out the Government's strategy for safeguarding soils in England. It sets out the following vision: "By 2030, all England's soils will be managed sustainably and degradation threats tackled successfully. This will improve the quality of England's soils and safeguard their ability to provide essential services for future generations." And identifies three main threats to soil: Soil erosion by wind and rain. Erosion affects both the productivity of soils but also water quality and aquatic ecosystems; Compaction of soil reduces agricultural productivity and water infiltration, and increases flood risk through higher levels of run off; And organic matter decline. The loss of soil organic matter reduces soil quality, affecting the supply of nutrients and making it more difficult for plants to grow, and increases emissions to the atmosphere.

The strategy set out a number of actions that the Government intended to take, in summary these are: A review of the need for future options under Environmental Stewardship to improve soil protection; A new goal to significantly reduce the rate of loss of stored soil carbon by 2020; A commitment to developing a new framework for action for peat protection, including on horticultural peat use post 2010; Reviewing thresholds for pollutants entering soil through recycling materials to land; Publishing a new code of practice for soil use on construction sites and a new toolkit for planners in 2010 on how to take account of soil functions through the planning system; Reviewing the effectiveness of the existing planning policy to protect important soils and whether there is a need to update it; And, publishing new best practice guidance on decision making for contaminated land.

Implications for Plan The Plan should consider impact on soil when developing policies, ensuring that there is protection of soil functions and policies which minimise the risk posed by contaminants when recycling organic materials to soil/land. It should also consider soil in terms of hazardous waste. (The protection of soils is also set out in the NPPF).

Implications for SA The SA framework should include objectives to conserve and enhance important soil functions.

Department for Environment, Food and Rural Affairs (2011) *The Natural Choice: securing the value of nature (White Paper)* (CM 8082). [14]

Summary Published as a response to the Nagoya Summit (2010), the White Paper promotes landscape scale approach to biodiversity conservation and emphasizes the value of ecosystem services, public engagement and the integration of biodiversity goals with economic development. It also establishes mechanisms for formally identifying and protecting urban Quiet Areas, so that people living in cities can benefit from access to areas of relative quiet for relaxation and contemplation. The paper seek that "by 2050 biodiversity is valued, conserved, restored and wisely used, maintaining ecosystem services, sustaining a healthy planet and delivering benefits essential for

all people".

Implications for Plan The Plan should promote protection and enhancement of biodiversity and should consider the promotion of biodiversity at a landscape scale.

Implications for SA The SA should consider inclusion of objectives to protect and, where possible, enhance biodiversity.

Department for Environment, Food and Rural Affairs (2011) Water for Life (Cm 8230). [06]

Summary The proposals set out in the White Paper introduce a new approach to water management, with the aim of stabilising consumer bills, protecting water resources, and ensuring water companies are as efficient as possible. The white paper aims to: Explain how the government will improve the condition of rivers by encouraging local organisations to improve water quality and make sure water is extracted from the environment in the least harmful way; Announces plans to reform the water industry and deregulate water markets to drive economic growth; Enables business and public sector customers to negotiate better services from suppliers and cut their costs; Removes barriers that have discouraged new entrants from competing in the water market; Asks water companies to consider where water trading and inter-connecting pipelines could help ensure secure water supplies at a price customers can afford; Enables water companies to introduce new social tariffs for people struggling to pay their bills and seeks to tackle bad debt.

Implications for Plan The Plan should seek to protect water resources and reduce water consumption.

Implications for SA The SA framework should seek to protect water quality and promote reduction of water consumption.

Department of Environment, Food and Rural Affairs (2012) National Policy Statement for Waste Water. [03, 04]

Summary The Government's vision for the water sector and some of the steps required to achieve this vision by 2030 are set out in the Future Water strategy paper which was published in February 2008. The government plans the following for the water industry: **Sustainable Development** - to seek waste water infrastructure that allows us to live within environmental limits and that helps ensure a strong, healthy and just society; **Public health and environmental improvement** - to continue to meet our obligations under the Urban Waste Water Treatment Directive by providing suitable collection and treatment systems to limit pollution of the environment; **To improve water quality in the natural environment** and meet our obligations under related European Directives, such as the Habitats Directive, the Water Framework Directive and its Daughter Directives; **To reduce water consumption** by households and industry which will have the knock on effect of reducing waste water production and therefore demand for waste water treatment infrastructure; **To reduce demand for waste water infrastructure capacity** by diverting surface water drainage away from the sewer system by using Sustainable Drainage Systems (SuDS); **Climate change mitigation and adaptation** - in line with the objectives of Defra's mitigation and adaptation plans to help deliver the UK's obligation to reduce greenhouse gas emissions by 80% by 2050 and work to carbon budgets stemming from the Climate Change Act 2008, within the context of the EU Emissions Trading System. Also to ensure that climate change adaptation is adequately included in waste water infrastructure planning; and **Waste Hierarchy** - to apply the waste hierarchy in

terms of seeking to first reduce waste water production, to seek opportunities to re-use and recycle resources and to recover energy and raw materials where possible.

- Implications for Plan The Plan should support statement in relation of waste water.
- Implications for SA The SA framework should reflect the priorities identified in the statement.

Department for Environment, Food & Rural Affairs (2013) Government forestry policy statement. [14]

- Summary The Forestry and Woodlands Policy Statement sets out the priorities for future Government policy-making, focused on protecting, improving and expanding our public and private woodlands. It covers, among other things, the future of the Public Forest Estate, woodland creation and management, the economic development of the forestry sector, community involvement in local woodlands and tree health. The statement confirms that the Public Forest Estate will remain in public ownership, and announces that a new body will be established to hold the Estate in trust of the nation and manage it for the long-term benefit of people, the economy and the environment.

- Implications for Plan The Plan should, where appropriate, seek to protect, improve, and expand existing trees, woodlands and forests and the public access to them. (This is repeated in the NPPF).

- Implications for SA The SA should consider the inclusion of objectives or indicators that protects existing and promotes new woodland areas.

Department for Environment, Food and Rural Affairs (2014) Energy from waste: A guide to the debate (revised edition). [03, 04]

- Summary This guide highlights key environmental, technical and economic issues to raise the level of understanding and debate around energy from waste.

- Implications for Plan This guide may provide a source to refer to when considering the implications of energy from waste developments, particularly in relation to best practice and latest research.

- Implications for SA None.

Department for Environment, Food & Rural Affairs (2014) Noise Action Plan Agglomerations. [02]

- Summary The action plan aims to promote good health and good quality of life (wellbeing) through the effective management of noise. It also seeks the promotion of Local Green Spaces delineated in Local or Neighbourhood Plans, for formal identification as Environmental Noise Directive (END) quiet areas.

This should operate under a 5 year review cycle, next update expected 2019.

- Implications for Plan See entry for Noise Policy Statement for England (2010) for Plan implications.

- Implications for SA See entry for Noise Policy Statement for England (2010) for SA implications.

Department for Environment, Food & Rural Affairs (2017) Air quality plan for nitrogen dioxide (NO₂) in the UK (2017). [cc]

- Summary The Air Quality Plan for Nitrogen Dioxide (NO₂) sets out the Governments strategy

	for addressing area of poor air quality in relation to NO ₂ . Unlike greenhouse gases, the risk from NO ₂ is focused in particular places and is primarily associated with road vehicles. The strategy sets out how the Government intends to support local councils identify these areas and find methods of addressing the issue. It also includes programmes for reducing emissions from vehicles.
Implications for Plan	The Plan should take account of designated Air Quality Management Areas in and around the Plan Area.
Implications for SA	The SA should seek the reduction of air pollution within its objectives.
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	Department for Exiting the European Union (2017) <i>The United Kingdom's exit from and new partnership with the European Union White Paper</i> . [cc]
Summary	The White Paper sets out the Governments 12 objectives that they seek to achieve during the negotiations with the European Union regarding the withdrawal from and new agreement with the European Union.
Implications for Plan	The withdrawal of the UK from the EU has introduced uncertainty as to which directives now and in the future will be transposed in full or in part into UK law, which in turn may alter Government policy and targets. In the short term the negotiations are unlikely to affect the Plan, however once the outcome of the negotiations is known, the impact will need to be assessed, if the Plan is still being prepared, at that time.
Implications for SA	The SA will need to be updated to reflect any changes to Government policy.
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	Department for Transport (2012) <i>National Policy Statement - Ports</i> . [11]
Summary	<p>The NPS for ports sets out the Government's policy for new port development. It outlines what the Department considers to be the potential economic, environmental and social impacts of port development, defining the acceptable limits of adverse impacts and explaining the levels of mitigation likely to be required depending on local circumstances. In doing so, it integrates planning policy from relevant Planning Policy Guidance and Planning Policy Statements produced by the Department for Communities and Local Government.</p> <p>The following topics are considered within the NPS: transport and the economy - the essential role of ports; the need for additional capacity; an uncertain future; a successful and competitive market-led sector; connecting ports to the rest of the transport network; transport that works for everyone; supporting economic growth; reducing greenhouse gases; contributing to better safety, security and health; promoting equality of opportunity; improving quality of life, and promoting a healthy natural environment; and key considerations for decision making.</p>
Implications for Plan	The Plan should support the key components of the NPS, and consider the key issues which it raises.
Implications for SA	The SA should support the key components of the NPS, and ensure that the policies developed within the Plan consider the key issues that have been raised.
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	Department of Energy & Climate Change (2009) <i>Renewable Energy Strategy</i> . [15]
Summary	This strategy sets out the Government's renewable energy strategy. It contains a target to ensure 15% of our energy comes from renewable sources by 2020: almost a

seven-fold increase in the share of renewables in just over a decade. The lead scenario suggests that we could see: More than 30% of our electricity generated from renewables, up from about 5.5% today. Much of this will be from wind power, on and offshore, but biomass, hydro and wave and tidal will also play an important role. 12% of our heat generated from renewables, up from very low levels today. We expect this to come from a range of sources including biomass, biogas, solar and heat pump sources in homes, businesses and communities across the UK. 10% of transport energy is to be sourced from renewables, up from the current level of 2.6% of road transport consumption. The Government will also act to support electric vehicles and pursue the case for further electrification of the rail network.

Implications for Plan The Plan should ensure that its policies work toward the 2020 renewable energy target.

Implications for SA SA Framework should include objectives and indicators relating to renewable energy.

Department of Energy & Climate Change (2009) UK Low Carbon Transition Plan: National Strategy for Climate Change and Energy, The. [cc]

Summary Plan plots how the UK will meet the 34% cut in emissions on 1990 levels by 2020. The Plan shows how the reductions in the power sector and heavy industry; transport; homes and communities; workplaces and jobs; and farming, land and waste sectors could enable carbon budgets to 2022 to be met.

The UK Government has a five point plan to tackle climate change: 1. Protecting the public from immediate risk; 2. Preparing for the future; 3. Limiting the severity of future climate change through a new international climate agreement; 4. Building a low carbon UK; and 5. Supporting individuals, communities and businesses to play their part.

Implications for Plan The Plan should ensure policies create a low carbon environment, which promote a decrease in emissions. Plan should emphasis a reduction in waste of high carbon and energy products.

Implications for SA The SA Framework should include objectives and indicators relating to carbon reduction.

Department of Energy and Climate Change (2010) Beyond Copenhagen (Cm 7850). [09]

Summary This paper sets out how the Government intends to pursue the agreement reach at Copenhagen, it sets out the following strategy: **At home:** Continue with long term plans to reduce emissions by at least 80% by 2050 on 1990 levels, with investment in low carbon technologies. **Within the EU:** Support action to invest in low-carbon jobs and growth through the EU 2020 strategy. EU should development low carbon infrastructure, and see budget focus on tackling key challenges such as climate change. **Internationally:** Support practical measure to support countries around the world in delivering action on reducing emissions and adapting to the impacts of climate change, including: Agree design principles of new green fund for dispersing climate finance at scale; Substantial progress in rolling out fast start funding (to provide finance approaching \$30 billion over 3 years to 2012; Recommendations from high-level advisory group on sources of climate finance; To launch a new REDD+ mechanism which will provide a package of finance and technical support to help developing countries tackle deforestation; To strengthen dialogue between countries

in the process of establishing emissions trading systems; Agreement on implementing the Copenhagen Accord commitment to establish a technology mechanism to support the development and deployment of low-carbon technologies; Release of adaptation funds quickly for poor and vulnerable countries.

Implications
for Plan

The Plan should support the priorities set out within the Action Plan.

Implications
for SA

The SA should ensure that climate change is covered by the framework, and that the SA supports the priorities set out within the action plan.

Department of Energy & Climate Change (2011) Carbon Plan: Delivering Our Low Carbon Future, The. [09]

Summary

The Carbon Plan is a government wide plan of action on climate change, including domestic and international activity. It sets a range of plans and targets for: low carbon buildings; low carbon transport; low carbon industry; low carbon electricity; and agriculture, land use, forestry and waste.

Implications
for Plan

The Plan should contribute towards achieving lower carbon emissions.

Implications
for SA

The SA objectives should support achieving lower carbon emissions.

Department of Energy & Climate Change (2011) Overarching National Policy Statement for Energy (EN-1). [15]

Summary

This policy statement sets out the Government's Energy and Climate Change Objectives for the Power Sector. In summary it seeks: To help deliver the UK's obligation to reduce greenhouse gas emissions by 80% by 2050 and work to carbon budgets stemming from the Climate Change Act 2008, within the context of the EU Emissions Trading System; To ensure that investment provides security of energy supply through a diverse and reliable mix of fuels and low carbon technologies û renewables, nuclear and fossil fuel plants fitted with carbon capture and storage; To further ensure that investment delivers an electricity grid with greater capacity and the ability to manage larger fluctuations in supply and demand; To support the elimination of fuel poverty and protect the vulnerable through ensuring energy infrastructure is delivered in a cost effective way that keeps energy bills as low as possible; To contribute to sustainable development by seeking energy infrastructure development that helps reduce climate change while also minimising negative impacts on the local environment.

Implications
for Plan

The Plan should ensure its policies help to deliver the UK's obligations in terms of reducing greenhouse gas emissions and cutting carbon through renewable energy production. The Plan should contribute towards sustainable development by encouraging energy infrastructure (but only where there is an identified need).

Implications
for SA

The SA framework should reflect the objectives identified in the NPS, especially in terms of assessing the contribution of renewable energy within the County.

Department of Energy & Climate Change (2011) National Policy Statement for Fuel Electricity Generating Infrastructure (EN-2). [15]

Summary

Government policy criteria for fossil fuel generating Stations The following criteria must be met before consent for a new fossil fuel generating station can be given: combined Heat and Power; carbon Capture Readiness; carbon Capture and Storage for coal-fired generating stations; climate change adaptation; and consideration of

"good design" for energy infrastructure.

This NPS has additional policy on: Air emissions; Landscape and visual; Noise and vibration; Release of dust by coal-fired generating stations; Residue management for coal-fired generating stations; and Water quality and resources.

Implications for Plan The Plan should ensure its policies help to deliver the UK's obligations in terms of reducing greenhouse gas emissions and cutting carbon through renewable energy production. The Plan should contribute towards sustainable development by encouraging energy infrastructure (but only where there is an identified need).

Implications for SA The SA framework should reflect the objectives identified in the NPS, especially in terms of assessing the contribution of renewable energy within the County.

Department of Energy & Climate Change (2011) National Policy Statement for Renewable Energy Infrastructure (EN-3). [15]

Summary This NPS does not seek to repeat the material set out in EN-1, which applies to all applications covered by this NPS unless stated otherwise. The reasons for policy that is specific to the energy infrastructure covered by this NPS are given, but where EN-1 sets out the reasons for general policy these are not repeated.

Implications for Plan The Plan should ensure its policies help to deliver the UK's obligations in terms of reducing greenhouse gas emissions and cutting carbon through renewable energy production. The Plan should contribute towards sustainable development by encouraging energy infrastructure (but only where there is an identified need).

Implications for SA The SA framework should reflect the objectives identified in the NPS, especially in terms of assessing the contribution of renewable energy within the County.

Department of Trade and Industry (2006) The Energy Challenge Energy Review Report 2006. [15]

Summary This is programme of action to work towards the Government's energy goals to 2020 and beyond. This work aims to put the UK in a position to meet the two major long-term challenges in energy policy: to tackle climate change by reducing carbon dioxide emissions; and to deliver secure, clean energy at affordable prices. The programme sets out key proposals to tackle these issues including: Increasing energy efficiency by influencing individual and commercial behaviour; Increasing small-scale power generation at a local level; Building a new generation of nuclear power stations and increased investment in UK power stations; Finding alternatives to oil as an energy source; Reforming the planning system in relation to energy projects; and Commissioning of a cross-governmental study on the adoption of a personal carbon allowance policy.

Implications for Plan The Plan should ensure that guidance is in place to encourage a reduction in carbon dioxide emissions whilst promoting sustainable economic growth, and identify sites for generating energy by capturing landfill gas and incineration. The Plan should also seek a reduction in waste of high carbon and energy products.

Implications for SA The SA Framework should include objectives and indicators relating to a reduction in greenhouse gas emissions.

Department of Trade and Industry (2007) Meeting the Energy Challenge - A White Paper on Energy. [15]

Summary	<p>This white paper sets out the Government's long term strategic vision for energy policy. It seeks: To put ourselves on a path to cutting CO2 emissions by 60% by 2050 with real progress by 2020; To maintain the reliability of energy supplies; To promote competitive markets in the UK and abroad; and, To ensure that every home is adequately and affordably heated.</p> <p>It places particular emphasis on: microgeneration (including CHP) and the role of renewable energy; reducing emissions from transport e.g. use of cleaner fuels, and vehicle efficiency; and maximising the supply & use of biomass, including from waste, in the production of sustainable energy (details are published in UK Biomass Strategy).</p>
Implications for Plan	The Plan should seek to: maximise production of energy from waste; reduce emissions from transport; be energy efficient; and support supply and use of biomass.
Implications for SA	The SA framework should reflect the priorities identified in the Strategy for tackling CO2 emissions and maximising renewable energy sources.

East Sussex County Council (2009) *East Sussex Climate Change Strategy*. [09]

Summary	<p>The overall aim for this strategy is: "to promote the prosperity and wellbeing of our community by reducing greenhouse gas emissions and adapting to climate change, and to enable individuals and organisations to tackle and adapt to climate change".</p> <p>Guiding the aim are the following principles: Climate change, above and beyond that which can be explained by natural variation, is happening, and the impact of this change poses significant risks for our local community; Addressing climate change requires both immediate work and long-term effort; Addressing climate change requires action at local, national and international levels; Addressing climate change will require resources, but the costs of not taking action will be far greater; We should all be exemplars of good practice in making positive progress towards tackling climate change; Climate change considerations must inform decision making, investment and policy development; As organisations and businesses, we need to work together to address climate change; And, as individuals, we all need to play our part in rising to the challenges of climate change.</p> <p>The aim will be achieved by addressing these four themes: Bring climate change into the mainstream of all that we do; Engage with new and existing partner organisations and the public; Reduce our greenhouse gas emissions ('mitigate'); And, create a community which can adapt to the changing climate.</p> <p>The strategy includes the following objectives: MA 1. Establish widespread local commitment to action on climate change; MA 2. Take account of climate change implications in all policy development; MA 3. Monitor and report progress, highlighting success as well as areas for further action and review the strategy; EN 1. Ensure that residents and organisations are well informed about climate change, including how they can play their part in mitigation and adaptation; EN 2. Ensure that programmes of support for action on mitigation and adaptation are available and suitable for individuals and organisations in East Sussex; MI 1. Understand current and forecast levels of greenhouse gas emissions from East Sussex; MI 2. Set the scale of appropriate local mitigation, at least in line with national government targets; MI 3. Determine the options available for the reduction of greenhouse gases; MI 4. Take action to reduce greenhouse gas emissions from East Sussex; AD 1. Consider the nature of likely future climatic conditions in East Sussex; AD 2. Understand local vulnerabilities to a changing climate, including extreme weather events, as well as the opportunities presented by change; AD 3. Assess the likely</p>
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risks to services, structures, business processes and the lives of residents and workers, and prioritise responses to risks; And AD 4. Make adaptations to climate change, revise policies and procedures, and implement changes to facilities and infrastructure.

Implications for Plan The Plan should comply with the local objectives, and deliver policies which support the strategy's vision and the principles guiding the aim. The Plan should contribute to achieving the UK's carbon targets and address the need to adapt to the impacts of climate change.

Implications for SA Aim and objectives will help shape the sustainability issues and problems and framework. SA framework and appraisal should reflect the Strategy's aim and objectives to address climate change.

East Sussex County Council (2011) East Sussex Local Transport Plan 3 (2011-2026). [11]

Summary Covering 2011 to 2026, our third Local Transport Plan (LTP3) sets the strategy for transport within East Sussex over the next 15 years. The vision of the plan is: "To make East Sussex a prosperous county where an effective, well managed transport infrastructure and improved travel choices help businesses to thrive and deliver better access to jobs and services, safer, healthier, sustainable and inclusive communities and a high quality environment. It seeks to achieve the following objectives: Improve economic competitiveness and growth; Improve safety, health and security; Tackle climate change; Improve accessibility and enhance social inclusion; And, improve quality of life.

Implications for Plan The Plan should to reflect the plan objectives.

Implications for SA The SA framework should include objectives that seek to reduce the harmful effects of waste and minerals traffic on the environment and communities including noise and greenhouse gas emissions.

East Sussex County Council et al. (2014) East Sussex Joint Waste Management Strategy. [03, 04]

Summary The Joint Waste Management Strategy replaces the East Sussex Municipal Waste Management Strategy (2006). It aims to: Reduce the amount of waste produced; Increase the amount of waste reused, recycled and composted; Reduce the amount of waste landfilled; Recover more value from our waste; Provide waste services that offer value for money, i.e. that are good and affordable, and are accessible to everyone; Review and continuously improve our waste services to ensure they remain environmentally sustainable and affordable; and Manage waste as close as possible to its source, ideally within the County. It seeks to meet the following targets: By 2020: Work to limit the total amount of household waste produced to 995 kg per household per year; Recycle and compost 50% of the household waste produced; Reuse 15% of the household waste produced; Recover energy from at least 95% of the rubbish that isn't reused, recycled or composted; and Divert at least 95% of waste from landfill. And by 2025: Recycle and compost 60% of the household waste produced.

Implications for Plan The WMLP should seek to help achieve these targets through adequate provision of waste management facilities.

Implications for SA The SA objectives should encompass the objectives set out in the strategy and

should consider the inclusion of indicators based on waste arisings and management.

East Sussex County Council (2016) East Sussex Landscape Character Assessment. [13]

Summary	The South Downs Integrated Landscape Character Assessment (ILCA), which as last updated in 2016, is an aid to decision making, helping us to understand the landscape, what is important and special about it, and how it may change in the future. As a document it is intended to guide change and development so that it does not damage the characteristics or value of the landscape. It also helps to identify ways that we can maintain and improve the character of a place. The East Sussex LCA defines 32 character areas. This helps us to understand the landscape character of the East Sussex.
Implications for Plan	The Plan should consider the impact on landscape character and seek to protect, conserve and enhance the landscape. Reference to relevant Landscape Character Assessments should be made where appropriate.
Implications for SA	The SA should seek to protect, conserve and enhance landscape character.

East Sussex County Council (2016) East Sussex Local Flood Risk Management Strategy 2016 - 2026. [07, 08]

Summary	<p>The East Sussex Local Flood Risk Management Strategy (LFRMS) provides the framework for the management of local flood risk in the county for the ten year period 2016 û 2026. The scope of the strategy is defined by legislation (the Flood and Water Management Act) and therefore focuses on the management of flood risk from surface water, groundwater and ordinary watercourses. The Environment Agency remains responsible for the management of coastal and main river (or fluvial) flooding and the district and borough councils retain responsibility for the management of coastal erosion risk.</p> <p>The Strategy outlines what is meant by risk, the principal forms of flooding and which Risk Management Authorities are responsible for the management of risk. The extent and severity of risk presented by local forms of flooding is also summarised. The Strategy establishes the Guiding Principle and Objectives which provide the framework for the framework for the Strategy. The principal elements / objectives of the Strategy include: the implementation of a proportionate approach to managing risk; managing flood risk as part of the planning process; ensuring that landowners and property owners are aware of their responsibilities; the communication of flood risk information to those who need it; improving the evidence base; partnership working to deliver solutions to flooding problems; and, identifying opportunities to bid for external funding to assist in delivering solutions.</p>
Implications for Plan	The Plan should address all types of flood risk by policy and as far as practicable follow the recommendations of Strategic Flood Risk Assessment which this document will feed into.
Implications for SA	The SA should consider all forms of flood risk within it's objectives and when recommending mitigation refer to the strategy.

East Sussex County Council (2018) East Sussex Statement of Community Involvement. [cc]

Summary	The SCI sets out how and when Local Authorities will engage communities in the
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preparation of Local Development Documents and Planning Applications. It states that the County Council will exceed these minimum requirements for community involvement where appropriate. This SCI will supersede the 2013 SCI.

Implications for Plan The Plan must meet and try to exceed the requirements for formal consultation set out in the Town and Country Planning (Local Planning) (England) Regulations 2012.

Implications for SA Consultations on the SA should fulfil community involvement requirements in the SCI.

East Sussex County Council (2018) *Waste and Minerals Local Plan Review: Strategic Flood Risk Assessment (Placeholder)*. [07, 08]

Summary **This is placeholder entry for referencing other existing or future documents. The document itself does not exist or has not been published at the time of writing.**

East Sussex County Council is preparing a Strategic Flood Risk Assessment (SFRA) alongside the Review of the Waste and Minerals Local Plan as required by national policy. The SFRA brings together information about all sources of flooding within the Plan Area. It also refines the areas identified as being at risk of flooding (Flood Zones 2, 3a & 3b). This document updated the SFRA prepared for the Waste and Minerals Sites Plan.

Implications for Plan The Plan should be informed by the findings of the SFRA.

Implications for SA The SA's assessment of the Plan against flood risk objectives should be informed by the findings of the SA.

East Sussex County Council (2019) *Neighbourhood Plans in the Plan Area (Placeholder Document)*. [cc]

Summary **This is placeholder entry for referencing other existing or future documents. The document itself does not exist or has not been published at the time of writing.**

Neighbourhood Plans, once 'made' form part of the Development Plan. They are not able to make policy in relation to 'strategic matters' which includes waste and minerals policy. Neighbourhood Forums and Parish Councils are not designated bodies under the Duty to Cooperate.

The following Parishes / Neighbourhood Areas have been designated and/or Neighbourhood Plans are being prepared or have been 'Made' in and adjoining the Plan Area:

City of Brighton & Hove: Hangleton & Knoll, Hove Park, Hove Station Forum; Rottingdean; Shoreham Neighbourhood Forum; and Brighton Marina Business Neighbourhood Forum.

East Sussex County: Barcombe; Battle; Burwash; Chailey; Crowborough; Crowhurst; Etchingham; Fairlight; Hadlow Down; Hailsham; Hartfield; Hellingly; Herstmonceux; Maresfield; Newhaven; Newick; Peacehaven; Plumpton; Ringmer; Rye; Salehurst and Robertsbridge; Seaford; Sedlescombe; Streat; Telscombe; Ticehurst; Uckfield; Wadhurst, and Wivelsfield.

South Downs National Park: Ditchling; Hamsey; Lewes; Streat; and Westmeston.

Adjoining Areas: Hawkhurst; Rolvenden; Sandhurst; Dormansland; Ansty and Staplefield; Ashurst Wood; East Grinstead; Hassocks; Haywards Heath; Horsted Keynes; Lindfield Rural; Upper Beeding; and West Hoathly.

Note, some parish areas are working jointly, but they are listed separately in the

lists above.

Implications for Plan The Plan should give consideration to the Neighbourhood Plans. Consultation of Neighbourhood Forum and Parish Council within and adjoining the Plan Area is required by regulation.

Implications for SA None.

East Sussex County Council, Brighton & Hove City Council & South Downs National Park Authority (2013) *East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan*. [cc]

Summary Sets out planning policies for the sustainable management and disposal of all types of waste generated in the Plan Area up to 2030. Sets the policy framework to enable the Authorities to judge the acceptability of applications for planning permission.

Overall, the vision for the Plan Area is to reduce the environmental footprint, particularly greenhouse gas emission associated with the production and management of waste and minerals.

The Plan seeks to reduce waste arisings, and to reuse, recycle or recover energy from waste, and dispose of the least possible amount of waste.

Implications for Plan The Review is not seeking to alter the overall objectives, but is looking to alter the strategy in relation to minerals provision. This Plan, therefore, should ensure that the aims and objectives of the Local Plan can continue to be met.

Implications for SA As this is a Review of the existing WMLP the SA objectives should, as a starting point, be based on previous SA objectives used in the preparation of the WMP and WMSP.

East Sussex County Council, Brighton & Hove City Council & South Downs National Park Authority (2017) *East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan*. [cc]

Summary The Waste and Minerals Sites Plan (WMSP) is a daughter document of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan. It makes site specific allocations for future built waste management facilities and safeguards existing minerals, waste and associated infrastructure (such as railheads and wharfs). A number of different types of allocations for built waste management facilities are identified including: allocations; areas of opportunity; areas of search; extensions to existing sites.

Implications for Plan Policies within the WMSP may fall within the remit of the review, in particular those relating to safeguarding.

Implications for SA As this is a Review of the existing WMLP the SA objectives should, as a starting point, be based on previous SA objectives used in the preparation of the WMP and WMSP.

East Sussex Strategic Partnership et al. (2008) *Pride of Place Working Towards a Better Future for Local People and Local Communities. A Sustainable Community Strategy for East Sussex*. [cc]

Summary This strategy was developed by the six Local Strategic Partnerships in East Sussex to create one integrated strategy. The priority of the strategy is to protect and enhance our natural and built environment for current and future generations, and enable individuals and organisations to tackle and adapt to climate change. It seeks

to: Reuse, reduce and recycle more household, business and industrial waste; Reduce traffic, increase alternative sustainable travel choices and improve air quality; Prepare for the effects of climate change; manage the risks and make the most of the opportunities; Encourage individuals and organisations to minimise their water consumption, CO2 emissions and overall environmental impact; And ensure climate change is a strategic consideration of Local Development Frameworks and other planning policies.

Implications for Plan The Plan should give consideration to the priorities identified in Pride of Place and climate change issues should be considered when developing policies.

Implications for SA The SA framework should reflect strategy within its objectives, with specific reference to: protecting and enhancing the natural and built environment; tackling and adapting to climate change; increasing sustainable travel; and minimising resource consumption and CO2 emissions.

East Sussex Strategic Partnership (2011) *Environment Strategy for East Sussex*. [cc]

Summary The Environment Strategy for East Sussex sets out to deliver the strategic priority for the environment and climate change in Pride of Place (the Sustainable Community Strategy for East Sussex), which is to protect and enhance our natural and built environment for current and future generations, and enable individuals and organisations to tackle and adapt to climate change. It focuses on ten principles (objectives). These are: 1. Promote the economic value of the environment and opportunities for growth in jobs and prosperity that it presents; 2. Reduce our greenhouse gas emissions, become more adaptive to climate change and help individuals and communities to do the same; 3. Protect and enhance the diverse inland, coastal and marine habitats of the county and the wildlife they support, making them more resilient to climate change, reversing biodiversity loss, and help create healthy seas and sustainable fisheries; 4. Respect and care for the built heritage of East Sussex, develop high quality environments in our towns and villages and protect and enhance the distinctive character of the county's landscapes; 5. Promote the use of open spaces as part of healthier and more active lifestyles; 6. Minimise the amount of waste created in East Sussex and reuse and recycle more household and business waste; 7. Reduce the impact of travel on the environment and improve sustainable travel choices to access services; and facilities within and between communities in the county; 8. Improve the quality of the environment and our health by reducing air and noise pollution; 9. Reduce the environmental impacts of food production and distribution, improve health through better diets and support the agricultural and food economy of the county; and 10. Increase our understanding, appreciation and stewardship of the environment of East Sussex.

Implications for Plan The objectives set out in the strategy are similar to those found in the NPPF and inline with those set out in the Sustainable Community Strategy for East Sussex. Some of the objectives are directly relevant to the Plan, whilst others are not relevant. The Plan should account for the relevant objectives above.

Implications for SA The objectives of the SA should broadly encompass the objectives of this strategy.

Eastbourne Borough Council (2013) *Eastbourne Core Strategy*. [cc]

Summary The Vision: By 2027 Eastbourne will be a premier seaside destination within an enhanced green setting. To meet everyone's needs Eastbourne will be a safe, thriving, healthy and vibrant community with excellent housing, education and

employment choices, actively responding to the effects of climate change.

There are 10 Key Spatial Objectives which support the vision. These are based around the following themes: 1. Sustainable Development; 2. Sustainable Growth; 3. Town centre Regeneration; 4. Local Economy; 5. Tourism; 6. Community Health; 7. Green Space and Biodiversity; 8. Sustainable Travel; 9. Quality of the Built Environment; and 10. Sustainable Neighbourhoods.

Implications for Plan The Review should be informed by the Eastbourne Core Strategy when producing sustainable aims and policies.

Implications for SA The SA objectives should reflect and not be in conflict with the plans spatial objectives.

Eastbourne Borough Council (2016) Eastbourne Employment Land Local Plan. [cc]

Summary The Employment Land Local Plan (ELLP) guides job growth and economic development in Eastbourne up to 2027 as well as identifying an appropriate supply of land for future employment development, in order to achieve a sustainable economy and make Eastbourne a town where people want to live and work. It specifically relates to land and buildings within the B1 (Offices and Light Industry), B2 (General Industry) and B8 (Storage and Distribution) Use Classes. The ELLP provides a review of the Eastbourne Core Strategy Local Plan Policy D2: Economy following concerns from the Planning Inspector over the amount of employment land required in Eastbourne, and the proposed strategy to deliver that requirement.

Implications for Plan The ELLP and WMLP are currently aligned. Policy within the ELLP supports the WMLP by enabling waste management and minerals infrastructure development in industrial areas and resists other incompatible development.

Implications for SA N/A

Eastbourne Borough Council (2019) Eastbourne's Direction of Travel: Issues and Options for the Eastbourne Local Plan. [cc]

Summary Eastbourne Borough Council are currently reviewing their Local Plan. This is the Issues and Options consultation document seeking input on the direction of a future draft Local Plan. It details the current issues that the Council believe should be addressed in their future Local Plan.

Implications for Plan None direct. The Plan should be prepared with the knowledge of the Issues and Options Plan. As the Plan progresses there may be opportunities for the plans to compliment one-another.

Implications for SA N/A

Environment Agency (2006) Underground, under threat: The state of groundwater in England and Wales. [06]

Summary The Environment Agencies Core Groundwater Policy is: "To protect and manage groundwater resources for present and future generations in ways that are appropriate for the risks that we identify." and to "Preventing pollution (the 'prevent or limit' approach) is by far the most sustainable and cost-effective way of maintaining good groundwater quality." The report cites activities that put groundwater at risk include: Discharge of waste and wastewater onto or into the

ground; and Civil engineering, mining, urban development and quarrying. The demand for water from industry has fallen. Increasing urban development threatens groundwater resources by increasing the rate at which water enters river systems. This can lead to flooding problems.

Implications for Plan The discharge of waste and wastewater into the ground is an activity that the Plan should seek to "prevent" or "limit" in East Sussex and B&H.

Implications for SA The SA should include objective to protect ground water.

Environment Agency (2009) *Adur: Catchment flood management plan*. [07, 08]

Summary This Plan helps the Environment Agency and partners to plan and agree the most effective way to manage flood risk in the future for the Adur catchment. The Plan contains the following objectives: Restore rivers and floodplains to a naturally functioning state where feasible; Protect and enhance nationally and internationally important species and habitats; Ensure the impact of flooding on people and property does not significantly increase in the future (for example due to climate change); Ensure the disruption caused by flooding to transport and critical infrastructure does not significantly increase in the future (for example due to climate change); Reduce the impact of muddy flooding; Ensure flood damages do not significantly increase in the future (for example due to climate change); And ensure that river channel and flood defence maintenance expenditure is appropriate to the economic damage of flooding.

Implications for Plan When preparing Plan policies the prevention of flooding and minimisation of flood risk should be a consideration. (This is reflected in the NPPF).

Implications for SA The objectives of the SA should encompass those found within the Catchment Plan.

Environment Agency (2009) *Cuckmere and Sussex Havens: Catchment flood management plan*. [07, 08]

Summary This Plan helps the Environment Agency and partners to plan and agree the most effective way to manage flood risk in the future for the Cuckmere and Sussex Havens catchment. The Plan has the following objectives: Ensure the harm to life caused by flooding does not increase; Reduce disruption to critical infrastructure caused by flooding; Ensure disruption to people and properties caused by flooding does not increase; Reduce the number of properties affected by surface water or urban drainage flooding; Sustain and protect sites of cultural, archaeological and historical value from flooding; Sustain and protect the landscape character, amenity and recreational values of the catchment; Ensure the cost of damages caused by flooding does not increase significantly due to future changes; Protect and enhance nationally and internationally designated sites. Protect and enhance Biodiversity Action Plan habitats through flood risk management; Protect and enhance where possible naturally functioning rivers and floodplains; Prevent a decline in water quality resulting from flood risk management activities;

Implications for Plan When preparing Plan policies the prevention of flooding and minimisation of flood risk should be a consideration. (This is reflected in the NPPF).

Implications for SA The objectives of the SA should encompass those found within the Catchment Plan.

Environment Agency (2009) *Medway: Catchment flood management plan*.

[07, 08]

Summary	This Plan helps the Environment Agency and partners to plan and agree the most effective way to manage flood risk in the future for the Medway catchment. The Plan has the following objectives: Ensure the impact on people, property and the built environment does not increase due to future changes; Reduce the flood risk to people where it is unacceptability high; Maintain critical infrastructure; Reduce the cost of flooding where it is unacceptability high; Protect and improve geomorphology; Protect and improve habitats and species; And to protect and improve cultural heritage and landscape.
Implications for Plan	When preparing Plan policies the prevention of flooding and minimisation of flood risk should be a consideration. (This is reflected in the NPPF).
Implications for SA	The objectives of the SA should encompass those found within the Catchment Plan.

Environment Agency (2009) Ouse, Sussex: Catchment flood management plan. [07, 08]

Summary	This Plan helps the Environment Agency and partners to plan and agree the most effective way to manage flood risk in the future for the Ouse catchment. The Plan has the following objectives: Reduce the number of properties affected by flooding; Reduce disruption caused by flooding to transport and critical infrastructure; Ensure the impact of flooding on people and communities does not increase (for example due to climate change); Reduce the risk of harm to life caused by flooding; Restore rivers and floodplains to a naturally functioning state; Protect and enhance nationally and internationally important species and habitats; Reduce the cost of flood damages; And ensure flood damages do not increase (for example due to climate change).
Implications for Plan	When preparing Plan policies the prevention of flooding and minimisation of flood risk should be a consideration. (This is reflected in the NPPF).
Implications for SA	The objectives of the SA should encompass those found within the Catchment Plan.

Environment Agency (2009) Rother and Romney: Catchment flood management plan. [07, 08]

Summary	This Plan helps the Environment Agency and partners to plan and agree the most effective way to manage flood risk in the future for the Medway catchment. The Plan has the following objectives: Reduce the cost of flooding to a sustainable level; Reduce the risk of flooding to people; Reduce the risk of flooding to key infrastructure; Conserve and enhance internationally and nationally designated nature conservation sites, and promote opportunities to create freshwater habitat when managing flood risk; And, to protect the character of the landscape and designated heritage features within it.
Implications for Plan	When preparing Plan policies the prevention of flooding and minimisation of flood risk should be a consideration. (This is reflected in the NPPF).
Implications for SA	The objectives of the SA should encompass those found within the Catchment Plan.

Environment Agency (2009) Water for people and the environment Water Resources Strategy for England and Wales. [07, 08]

Summary The strategy sets out the pressures facing the water environment and advocates numerous actions which will help to ensure that the aims and vision of the strategy will be met. The overall strategy aim being: "A better place for people and wildlife for present and future generations", within this the vision is for there to be enough water for people and the environment, meeting legitimate needs.

The strategy seeks to achieve the following objectives: Adapting to & mitigating climate change - to manage water resources and protect the environment in the face of climate change; A better water environment - species and habitats that depend on water are restored, protected, improved and valued; Sustainable planning and management of water resources - good water management contributes to sustainable development by supporting people and the economy in an improved environment; Water and the water environment are valued - people value water and enjoy their water environment and understand how it contributes to their quality of life.

Key actions included in the plan relevant to local authorities include: Require sustainable drainage schemes in all new developments; and in areas where water resources are under pressure: include measures that support water neutrality in new development and require developers to produce water cycle studies; and adopt water efficiency standards in planning conditions that are tighter than buildings regulations.

Implications for Plan Brighton & Hove and East Sussex are located within an area where water resources are under pressure. The Plan should include measures which will help achieve the strategy's aims. Development Management policies should include measures to reduce water usage in new development to levels above those required by Building Standards, aspiring to water neutrality in addition to requiring SuDS. Wastewater should be recognised as an important resource of water, which can be used to support the water environment and sustain downstream abstractions. The location of the point of discharge is key to the ability to re-use this resource and may be a consideration in site searches.

Implications for SA The SA Framework should include objectives which seek to maintain and improve water quality, and protect water resources.

Environment Agency (2016) *South East river basin district river basin management plan*. [06]

Summary This South East river basin district river basin management plan sets out the: current state of the water environment; pressures affecting the water environment; environmental objectives for protecting and improving the waters; programme of measures, actions needed to achieve the objectives; and progress since the 2009 plan. It informs decisions on land-use planning because water and land resources are closely linked.

This seeks to meet the objectives of the Water Framework Directive. In the Plan it identifies the following issues that it seeks to address: Physical modifications; Pollution from waste water; Pollution from towns, cities and transport; Changes to the natural flow and level of water; Negative effects of invasive non-native species; and Pollution from rural areas.

Implications for Plan Plan should take into account the objectives of the River Basin Management Plan and therefore include measures which support and contribute to halting the deterioration of aquatic ecosystems, and ensures no deterioration in the status of Water Framework Directive water bodies and contributes to the achievement of

good status.

Implications for SA The SA framework should seek to maintain and improve water quality. Indicators of water quality should be linked to the River Basin Management Plan's targets.

European Commission (2005) *EU Thematic Paper: Taking sustainable use of resources forward: A Thematic Strategy on the prevention and recycling of Waste*. [03, 04]

Summary Main elements of the proposed new strategy: **Life-cycle approach:** The strategy proposes to look beyond the pollution caused by waste to consider its potential contribution to a more sustainable use of natural resources and raw materials. This aspect is dealt with in a separate strategy on the sustainable use of natural resources. **Prevention:** Member states will be required to develop waste prevention policies that will "reach out to the individuals and businesses" responsible for waste generated in the first place. These will have to be adopted within three years following the adoption of the revised waste framework directive. Follow-up reports will have to be submitted every three years afterwards. **Recycling:** EU-wide environmental standards on recycling will be adopted to "support the development of an EU market for secondary (recycled) materials." **Simplifying** existing legislation: This is also a major priority which will apply along the principles of the Commission's 'better regulation' initiative.

Targets: The new strategy does not impose specific waste recycling or prevention targets. The Commission therefore says it is "not expected to result in any quantifiable financial costs" on member states and businesses.

Incineration: A revision of the IPPC Directive (Integrated Pollution Prevention and Control) will be tabled that will set "an ambitious benchmark" to improve energy recovery from municipal incinerators. The Commission says the new energy efficiency benchmark "will determine whether an incinerator can be identified as a recovery facility instead of a disposal facility."

Implications for Plan The Plan should consider potential of waste as a resource. It should support waste minimisation and maximising recycling.

Implications for SA The SA objectives should include waste minimisation, recycling and recovery.

Foreign & Commonwealth Office (2002) *Kyoto Protocol to the United Nations Framework Convention on Climate Change* (Cm 5379). [09]

Summary The Protocol seeks to: to negotiate binding limitations on greenhouse gases for the developed nations, pursuant to the objectives of the Framework Convention on Climate Change of 1992; and to limit the emissions of six greenhouse gases (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, sulphur hexafluoride). The UK has a Kyoto target to reduce emissions by 12.5% below base year levels (1990 for the 3 major gases - CO₂, methane and NO_x) by 2008-2012.

Implications for Plan The Plan should support reduction in greenhouse gas emissions.

Implications for SA The SA should consider inclusion of objectives to support reduction in greenhouse gas emissions.

Hastings Borough Council (2015) *Hastings Development Management Plan*. [cc]

Summary The vision for Hastings states that 'By 2028 Hastings will be a safe and thriving place to live in, that offers a high quality of life, and has a strong economy and sustainable future, founded upon our unique heritage and seaside location, and supported by social, economic, cultural and environmental regeneration.'

To achieve the vision a number of strategic objectives (which are accompanied by 'critical success factors') including: increased business activity; identifying land that will support the needs and opportunities of businesses; use previously developed land; improvements in strategic transport infrastructure at a local, county and national level; promote sustainable alternatives to the car; improve the health and wellbeing of the population; and promote, enhance and manage the town's unique cultural heritage, historic buildings and natural landscape.

The Hastings Development Management Plan is in conformity with and compliments the Hastings Planning Strategy setting policy for specific site allocations within the Hastings Borough and gives specific consideration to design, amenity and access. The Development Management Plan sets out 13 character areas providing a vision for each.

Implications for Plan The Plan should take account of the objectives outlined in the DPD i.e. using previously developed land and promoting cultural heritage, historic buildings and natural landscape.

Implications for SA The SA framework should reflect the relevant plan objectives.

Hastings Borough Council (2014) *Hastings Planning Strategy, The*. [cc]

Summary The Hastings Planning Strategy is a Local Plan document which sets the direction of future development in Hastings until 2028. It is based on the vision of: "By 2028 Hastings, founded upon our unique heritage, natural environment and seaside location, and supported by social, economic, cultural and environmental regeneration will be a safe and thriving place to live, work and visit, that offers a high quality of life, and has a strong economy and sustainable future."

Total future housing provision for Hastings is 'at least' 3,400 between 2011 and 2028.

Implications for Plan The Plan should be informed by the policies contained within the Strategy.

Implications for SA The objectives and indicators of the SA should be informed by the content of the Strategy.

High Weald AONB Joint Advisory Committee (2019) *The High Weald Area of Outstanding Natural Beauty Management Plan 2019-2024 (4th ed)*. [13]

Summary This Plan has been formally adopted by all 15 local authorities covering the High Weald AONB as their policy for management of the AONB. It sets out their policy aspirations for the AONB and provides a framework to help them make judgments about the delivery of their services in relation to it. The Plan also has a wider role: providing a transparent and accessible means by which all public bodies can ensure they are exercising their duty to have regard to the purposes of designation (CROW Act, Section 85); and providing a guide for everyone involved with the AONB on the actions they can take to care for the area.

The Plan has a number of objectives for the AONB including: Retains its distinctive historic landscape character and beauty, and has halted the erosion of natural beauty avoiding poor development and incremental change; Is maintained by sustainable land management practices, such as regenerative agriculture, wilding,

small-scale woodland management and agro-forestry, and sees land managed by different people through diverse activities that are supported and nurtured where they deliver public benefits; Displays thriving wildlife and improving ecological quality in its highly interconnected and biodiverse landscape; Is embracing a low-carbon future with green technologies and non-fossil fuel transport underpinning a strong rural economy and thriving communities; Engages people with nature and contributes to the health and wellbeing of people within and outside the area; Demonstrates a consistent approach to planning across the AONB, allowing for appropriate housing and economic needs of thriving communities and the land-based sector without compromising the characteristic historic settlement pattern; Displays healthy natural systems including clean air and water providing benefits across the South East; Celebrates woodland history and nurtures a woodland economy whose timber products are highly valued; Facilitates active participation by people, their communities and businesses, in conserving the area and managing change; Provides a warm welcome and high quality experience for residents and visitors seeking inspiration and enjoyment of its landscape and rich, well understood and celebrated cultural heritage; Is valued and understood by people, businesses and communities landscape championed by the High Weald Joint Advisory Committee.

Implications for Plan	Plan to seek to ensure that new developments seek to meet the objectives of the AONB Plan and are sympathetic to the landscape character of the locality.
Implications for SA	The SA framework should consider policies from the AONB management plans. It may also wish to include objectives such as: To protect, enhance and conserve the diversity, heritage, quality, and natural beauty of the AONBs; and to provide opportunities to source materials locally.

HM Treasury (2010) *National Infrastructure Plan: October 2010*. [cc]

Summary	The Plan sets out the Government's vision for major infrastructure investment in the UK. This will focus on the following areas [objectives]: maximising the potential of existing road and rail networks; transforming energy and transport systems to deliver a low carbon economy; transforming the UK's strategic rail infrastructure; meeting future challenges in providing sustainable access to water for everyone; protecting the economy from the current and growing risk of floods and coastal erosion; reducing waste and improving the way it is treated; providing the best superfast broadband in Europe; and ensuring that the UK remains a world leader in science, research and innovation.
Implications for Plan	The authors of the Plan should be aware of the content of the Infrastructure Plan. There do not appear to be any specific projects identified within the Infrastructure Plan that will directly affect the Plan Area, but there are some such as the reduction of waste to landfill through the provision of PFI which may indirectly impact the Plan.
Implications for SA	The objectives set out in the Plan reflect Government priorities and where relevant should be included within the broad scope of the SA objectives.

HM Treasury (2012) *National Infrastructure Delivery Plan 2016-2021*. [cc]

Summary	This strategy sets out how the government intends to implement the National Infrastructure Plan.
Implications for Plan	The Plan authors should be aware of the implementation details of the National Infrastructure Plan.

Implications
for SA None.

Kent County Council (2016) *Kent Minerals and Waste Local Plan 2013-30*. [05]

Summary The Kent Minerals and Waste Local Plan 2013-30 (MWLP) contains the overarching strategy and planning policies for mineral extraction, importation and recycling, and the waste management of all waste streams that are generated or managed in Kent, and the spatial implications of economic, social and environmental change in relation to strategic minerals and waste planning. The Plan is a 'Core Strategy' type document and a second plan containing site specific policies is anticipated.

The Plan contains 15 strategic objectives These are: 1. Encourage the use of sustainable modes of transport for moving minerals and waste long distances and minimise road miles; 2. Ensure minerals and waste developments contribute towards the minimisation of, and adaptation to, the effects of climate change. This includes helping to shape places to secure radical reductions in greenhouse gas emissions and supporting the delivery of renewable and low carbon energy and associated infrastructure; 3. Ensure minerals and waste sites are sensitive to both their surrounding environment and communities, and minimise their impact on them; 4. Enable minerals and waste developments to contribute to the social and economic fabric of their communities through employment opportunities; 5. Seek to ensure the delivery of adequate and steady supplies of sand and gravel, chalk, brickearth, clay, silica sand, crushed rock, building stone and minerals for cement during the plan period, through identifying sufficient sites and safeguarding mineral bearing land for future generations; 6. Promote and encourage the use of recycled and secondary aggregates in place of land-won minerals; 7. Safeguard existing, planned and potential sites for mineral infrastructure including wharves and rail depots across Kent to enable the on-going transportation of marine dredged aggregates, crushed rock and other minerals as well as other production facilities; 8. Enable the small-scale, low-intensity extraction of building stone minerals for heritage building products; 9. Restore minerals sites to the highest possible standard to sustainable after-uses that benefit the Kent community economically, socially or environmental-ly. Where possible, after-uses should conserve and improve local landscape character and incorporate opportunities for biodiversity to meet targets outlined in the Kent Biodiversity Action Plan, the Biodiversity Opportunity Areas and the Greater Thames Nature Improvement Area; 10. Encourage the sustainable use of the inert non-recyclable fraction of Construction, Demolition and Excavation Waste for quarry restoration; 11. Increase amounts of Kent's waste being re-used, recycled or recovered. Promote the movement of waste up the Waste Hierarchy by enabling the waste industry to provide facilities that help to deliver a major reduction in the amount of Kent's waste being disposed of in landfill; 12. Promote the management of waste close to the source of production in a sustainable manner using appropriate technology and, where applicable, innovative technology, such that net self-sufficiency is maintained throughout the plan period; 13. Use waste as a resource to provide opportunities for the generation of renewable energy for use within Kent through energy from waste and technologies such as gasification and aerobic/anaerobic digestion; 14. Provide suitable opportunities for additional waste management capacity to enable waste to be managed in a more sustainable manner; 15. Restore waste management sites to the highest possible standard to sustainable after-uses that benefit the Kent community economically, socially or environmental-ly. Where possible, after-uses should conserve and improve local landscape character and incorporate opportunities for biodiversity to meet targets outlined in the Kent Biodiversity Action Plan, the Biodiversity Opportunity Areas and the

Greater Thames Nature Improvement Area.

Implications for Plan	The Lydd Quarry straddles the border between East Sussex and Kent. The provision of minerals in East Sussex should be informed by the content of the MWLP. Cross-border issues may need to be considered. The Plan should not undermine the MWLP.
Implications for SA	The objectives of the MWLP should, where applicable, be encompassed within the SA objectives. The SA should ensure that the Plan does not conflict with the MWLP.

Lewes District Council (2003) Lewes District Local Plan. [cc]

Summary	The Plan aims to: reduce pollution, prevent loss of natural resources and create a healthy, safe, and secure environment; improve the range of employment opportunities and promote local commerce and industry; and reduce the growth in the number and distance of journeys made by private car and encourage the use of more energy efficient and less polluting modes of public and private transport.
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Relevant Policies:

The Lewes Local Plan contains sustainable development policies on transport and accessibility, protecting and enhancing the environment and protection of open space. As these policies are derived from county, regional and national planning policy, they do not need to be repeated.

Policy NH 24: North Quay is identified in the adopted Minerals Local Plan as an area where the retention and further development of facilities for receiving and processing sea borne imported aggregates would be supported. North Quay is also identified as a Minerals Consultation Area (MCA) where consultation with the County Council is required on applications for development which would sterilise important mineral facilities.

Beddingham and Glynde BG1 Land at Balcombe Pit: Allocated for development for: a) Business Uses (Use Class B1) and b) General Industry (Use Class B2). Balcombe Pit is currently operational for the extraction of chalk, the Minerals Local Plan identifies the potential for an extension where it is not within the Sussex Downs AONB and has satisfactory access. If the chalk extraction is implemented it would not prejudice the business and industrial uses proposed in the District Local Plan.

Chailey Parish (Brickworks): Chailey Brickworks is an important established employer within the area.

Implications for Plan	The Plan should incorporate the sustainable development aims of the Lewes Local Plan and should consider maintaining the facility for receiving and processing sea borne imported aggregates.
Implications for SA	As with all of the local plans, sustainability is the key driver behind the aims and objectives of the Lewes District Local Plan. These should therefore be a key source for identifying SA objectives and possible indicators. SA framework should include waste minimisation objectives and may wish to consider the following indicators: Employment; Distance and number of journeys of W&M vehicles; Public transport use; Areas of established character; Historic battlefields; Archaeological Sites; and Conservation Areas.

Lewes District Council (2005) Lewes AQMA 2005 [Designation]. [10]

Summary	The Detailed Assessment (Sept 2004) concluded that pollution levels in Fisher Street (Lewes town centre) were likely to exceed the annual mean air quality objective for nitrogen dioxide and an AQMA for nitrogen dioxide was declared.
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A Draft Air Quality Action Plan was produced in September 2007 setting out measures to improve air quality particularly in Lewes Town Centre by reducing pollution emitted from vehicles and the amount of traffic on the roads.

Monitoring has continued with reports published in 2013 and 2014.

Implications for Plan The Plan should consider impacts and avoid developments and activities which would further the already exceeded air pollution levels.

Implications for SA The SA should consider the location of the AQMAs and whether the transportation of waste and minerals would have a negative impact on the surrounding air quality.

Lewes District Council (2008) *Newhaven AQMA 2008 [Designation]*. [10]

Summary Newhaven has been identified as having possible exceedances of nitrogen dioxide. Further monitoring is being carried out. (Local Air Quality Management Progress Report 2008)

Monitoring has continued with reports published in 2013 and 2014.

Implications for Plan The Plan should consider impacts and avoid developments and activities which would further the already exceeded air pollution levels.

Implications for SA The SA should consider the location of the AQMAs and whether the transportation of waste and minerals would have a negative impact on the surrounding air quality.

Lewes District Council and South Downs National Park Authority (2016) *Lewes District Local Plan: Part 1 - Joint Core Strategy 2010-2030*. [cc]

Summary The vision for the Lewes District for the next 20 years is: To enhance and maintain the District's nationally and internationally important landscape, natural and historic environment; To ensure all communities are getting healthier and more prosperous by working to achieve vibrant, diverse, distinctive, safe and sustainable places to live; To minimise the impact of growth on the countryside and to prioritise development in urban areas; And to address the lack of access to facilities (for young people), the needs of an aging population, access to affordable housing, and deprivation on the coast.

The objectives that will deliver the vision are based around the following: Maintain and enhance vibrancy, distinctiveness and diversity, ensuring high quality and well-designed developments. Promote and enhance natural and manmade environments. Seek efficient and sustainable use of resources in development proposals. Allow new development in the most sustainable locations. Balance the need for housing and employment land and other development. Provide an environment that stimulates sustainable economic growth. Supply social and cultural infrastructure throughout the district to meet community needs. Improve accessibility by public transport, walking and cycling. Work with a range of housing providers and allocate sufficient land to create well designed housing (with appropriate size, type and tenure) to meet local housing needs. Avoid development that would increase risk of flooding, coastal erosion, noise or pollution.

Implications for Plan The DPD should be used to inform the Plan in producing sustainable aims and policies.

Implications for SA The SA objectives should reflect and not be in conflict with the plans objectives.

Lewes District Council (2017) *Lewes Local Plan Part 2: Site allocations and*

development management policies (Pre-submission). [cc]

Summary	<p>The Lewes District Local Plan will form part of the approved development plan for the area and will comprise of two documents: Local Plan Part 1: Joint Core Strategy 2010-2030 and Local Plan Part 2: Site Allocations and Development Management Policies. Local Plan Part 1 is the strategic level plan for the whole district, (see separate entry). Local Plan Part 2: Site Allocations and Development Management Policies comprises the second of the Local Plan documents. It supports and seeks to deliver the strategic objectives and spatial strategy of the Local Plan Part 1 by: identifying and allocating additional sites to meet development growth identified in Local Plan Part 1; and setting out detailed (non-strategic) development management policies to guide development and change. The Plan covers the area of Lewes District outside of the South Downs National Park. The majority of site allocations are identified through daughter neighbourhood plans with a small number of exceptions.</p> <p>This Plan has been subject to an Examination in Public during 2019. The Council is awaiting the Inspector's Report.</p>
Implications for Plan	Plan authors should be aware of the content of the District Plan. The Plan should not conflict with the District Plan.
Implications for SA	None.

Marine Management Organisation (2018) South Inshore and South Offshore Marine Plan. [05]

Summary	<p>The Marine and Coastal Access Act (Section 51(1)) requires a marine plan for each marine plan area, including for the south inshore and offshore areas. The south inshore and offshore marine plan areas share various features and activities, many reliant on both areas, so a single document has been produced. For the purpose of this document the two plans will be collectively referred to as the 'South Marine Plan'. It is acknowledged that they remain two separate plans as required in the Marine Coastal Access Act - the South Inshore Marine Plan and the South Offshore Marine Plan. The plan is supported by a separate Technical Annex which includes more detail for example on the context for policies and how they will be implemented.</p>
Implications for Plan	In the event the Plan considers development that may have implications for the marine environment, the policies of Draft South Marine Plan should be considered. Given that most, if not all development is likely to be terrestrial, the implications for the Plan are limited, but this should be kept under review.
Implications for SA	The effect on the marine environment may be a consideration within the objectives set.

Ministry of Housing, Communities & Local Government (2012) National Design Guide. [01, 02, 09, 13]

Summary	<p>The National Design Guide is a guidance document that supports the National Planning Policy Framework. It sets out good design principles predominantly for residential development but, these principles can be adapted to all forms of development.</p>
Implications for Plan	The WMLP should reflect best practice on design.

Implications for SA	The seeking of good design should be included SA objectives / criteria.
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	Ministry of Housing, Communities and Local Government (2019) <i>National Planning Policy Framework</i> . [cc]
Summary	<p>The National Planning Policy Framework sets out the Government's planning policies for England and how these are expected to be applied. The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions.</p> <p>At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.</p> <p>For plan-making this means that: local planning authorities should positively seek opportunities to meet the development needs of their area; Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.</p> <p>This replaced the NPPF (2018)</p>
Implications for Plan	The Plan should contribute to the objective of achieving sustainable development (social, economic and environmental).
Implications for SA	The SA Objectives should reflect the core planning principles and policies set out in the NPPF.
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	Newhaven Enterprise Zone (2018) <i>Newhaven Enterprise Zone Strategic Framework</i> . [cc]
Summary	<p>The focus of the framework is to act as the catalyst for positive growth in Newhaven, which would not happen so readily without the practical incentives for business, and shared ambition for the economic success of the town.</p> <ul style="list-style-type: none"> • Priority 1, Quality Growth: To promote cohesive development which will foster pride in Newhaven, recognising the town's exceptional natural capital and also its working port and coastal connections. • Priority 2, Inclusive Growth: To deliver local skills and support for businesses which will create a diverse and prosperous economy, ensuring Newhaven residents are shared benefactors of change. • Priority 3, Sustainable Growth: To invest in housing and infrastructure which will attract inward investment, creating a lasting economic and social legacy for Newhaven <p>The Enterprise Zone offers reduced business rates in certain circumstances, business support and community investment funds in relation to the Newhaven Enterprise Zone.</p> <p>On their website the Enterprise Zone recognises the importance of North Quay in relation to the WMP. It does not make reference to the minerals facility in East Quay, but this may be owing to the date of publication.</p>
Implications for Plan	The Plan should seek to compliment the Enterprise Zones vision and objectives.
Implications for SA	None

Newhaven Port Authority (2012) *Newhaven Port Masterplan*. [cc]

Summary	<p>Newhaven Port & Properties Ltd began the process of preparing a Masterplan for the Port in September 2009 and they appointed a team of consultants to assist them in this process. The Port Masterplan was published in January 2012.</p> <p>The port masterplan (PMP) clarifies the port's strategic planning in the medium to long term and informs the port users, employees and local communities about potential future port development. In addition the PMP supports local and regional planners and transport network providers in revising their strategies (related to their planning review cycle).</p>
Implications for Plan	The co-operation and support of the Port Authority may be required. Plan should seek to not conflict with the Port Authority's ambitions.
Implications for SA	SA objectives and criteria should be informed by the Masterplan.

Public Health England (2016) *Working Together to Promote Active Travel: A briefing for local authorities*. [01, 11]

Summary	This briefing has been written for transport planners, others concerned with the built environment, and public health practitioners. It looks at the impact of current transport systems and sets out the many benefits of increasing physical activity through active travel. It suggests that while motorised road transport has a role in supporting the economy, a re-balancing of our travel system is needed.
Implications for Plan	The plan should seek to promote public health and well-being, particularly in relation to travel. This may be directly through providing better access to facilities by sustainable means, e.g. train, or indirectly by providing materials for sustainable transport development.
Implications for SA	The SA framework should ensure objectives cover the subject of health and wellbeing.

Rother District Council (2006) *Rother District Local Plan*. [cc]

Summary	<p>Vision: To provide a high quality of life based on vibrant and inclusive communities, access to a wide range of jobs and respect for the built and natural environment.</p> <p>Relevant Policies:</p> <p>The Rother Local Plan contains policies on encouraging renewable energy and sustainable transport as well as a locally relevant set of criteria to promote sustainable development. As these policies emanate from county, regional and national planning policy, they do not need to be repeated.</p> <p>Rye Harbour Road Employment Area RY7</p> <p>The vacant sites at Harbour Road, Rye represent a significant potential for further job creation. Proposals (Use Classes B1-B8) will be supported subject to improvements to the Harbour Road/A259 junction and implementation of the Tidal Walls Embankments flood alleviation scheme.</p>
Implications for Plan	<p>The WMLP should encourage renewable energy schemes and sustainable transport opportunities as well as the sustainable development criteria.</p> <p>Potential for increasing mineral landing and processing at Rye Harbour.</p>
Implications for SA	As with all of the local plans, sustainability is the key driver behind the aims and

objectives of the Rother District Local Plan. These should therefore be a key source for identifying SA objectives and possible indicators.

Rother District Council (2014) *Rother Local Plan: Core Strategy*. [cc]

Summary The Rother Local Plan Core Strategy sets out the strategic direction for land-use planning in Rother District. It has five objectives, these are: 1. Build more sustainable communities with a better balance between homes and jobs; 2. Maintain character of settlements, their relationship between them and with their landscape settings; 3. Promote economic regeneration and growth for the Hastings / Bexhill area; 4. Support the 'market town roles and environmental qualities of Battle and Rye; and 5. Meet local need and promote vital, viable and mixed communities in the rural areas, whilst giving particular attention to the economic, ecological, public enjoyment and intrinsic value of the countryside. Targets include no loss of semi-natural ancient woodland, maintain air quality within UK Strategy for Air Quality targets, and recycle or compost 50% of all waste by 2010.

Implications for Plan The Plan should support regeneration and growth within the Plan Area.

Implications for SA The SA objective should encompass the objectives within the Rother Local Plan.

Rother District Council (2019) *Rother Local Plan: Development and Site Allocations (DASA)*. [cc]

Summary The Rother Local Plan Core Strategy sets out the strategic direction for land-use planning in Rother District. The Development and Site Allocations (DaSA) Local Plan seeks to achieve the Core Strategy's 'Vision' and 'Strategic Objectives' and to facilitate delivery of its development targets. It is comprised of Development Policies which complement and provide further detail on the policies in the Core Strategy and Site Allocations which identify sites for development. Of particular relevance to the Plan are the developments around Bexhill and Rye. The Rother Local Plan Core Strategy sets out the strategic direction for land-use planning in Rother District. The Development and Site Allocations (DaSA) Local Plan seeks to achieve the Core Strategy's 'Vision' and 'Strategic Objectives' and to facilitate delivery of its development targets. It is comprised of Development Policies which complement and provide further detail on the policies in the Core Strategy and Site Allocations which identify sites for development. Of particular relevance to the Plan are the developments around Bexhill and Rye.

The DaSA has been subject to Public Examination and the Inspector's Report has been published. At the time of writing, it has yet to be adopted.

Implications for Plan The authors of the Plan should be aware of the content of the DASA. The Plan should not conflict with the DASA.

Implications for SA The SA objective should encompass the objectives within the Rother Local Plan.

South Downs National Park Authority (2011) *South Downs Integrated Landscape Character Assessment (ILCA)*. [13]

Summary The South Downs Integrated Landscape Character Assessment (ILCA), last updated in 2011, is an aid to decision making, helping us to understand the landscape, what is important and special about it, and how it may change in the future. As a document it is intended to guide change and development so that it does not damage the characteristics or value of the landscape. It also helps to identify ways that we can

maintain and improve the character of a place. The South Downs LCA defines 18 general landscape types within the National Park as well as 49 more place-specific 'character areas'. This helps us to understand the landscape character of the National Park.

Implications for Plan The Plan should consider the impact on landscape character and seek to protect, conserve and enhance the landscape. Reference to relevant Landscape Character Assessments should be made where appropriate.

Implications for SA The SA should seek to protect, conserve and enhance landscape character.

South Downs National Park Authority (2014) *Partnership Management Plan: Shaping the future of your South Downs National Park 2014-2019*. [13]

Summary The Partnership Management Plan (PMP) is an overarching five-year strategy for the management of the South Downs National Park. Its starting point is the State of the South Downs National Park Report 2012, which provided baseline information against which the success of future action arising from this PMP can be measured. The PMP does not contain planning policies, but does provide a framework for the emerging Park-wide Local Plan. This Local Plan will include spatial planning policies for housing and other development. Minerals and waste planning is covered in detail through the joint minerals and waste plans developed with local authorities. The PMP will, where necessary, consider impacts on the National Park's special qualities from outside its boundary as well as from within. This could be through wildlife species migration, water flows or water use, traffic, economic activity or views to and from the area.

Implications for Plan The authors of the Plan should be aware of the content of the PMP. The SNDPA Local Plan provides a more developed plan which may provide better guidance for the Plan in the first instance.

Implications for SA The purposes and duty of the National Park and the objectives in the Local Plan should be encompassed within the objectives of the SA.

South Downs National Park Authority (2019) *South Downs Local Plan*. [cc]

Summary The South Downs Local Plan is a Local Plan prepared by the South Downs National Park Authority. It is a 'landscape led' plan which means allocations and policies are therefore landscape capacity led, not target driven. It is founded on purposes and the duty of the Park which are to: 'To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public; and to seek to foster the economic and social well-being of the local communities within the National Park'.

The Plan contains nine objectives, these are: 1. To conserve and enhance the landscapes of the National Park; 2. To conserve and enhance the cultural heritage of the National Park; 3. To conserve and enhance large areas of high-quality and well-managed habitat to form a network supporting wildlife throughout the landscape; 4. To achieve a sustainable use of ecosystem services thus enhancing natural capital across the landscapes of the National Park and contributing to wealth and human health and wellbeing; 5. To protect and provide opportunities for everyone to discover, enjoy, understand and value the National Park and its special qualities; 6. To adapt well to and mitigate against the impacts of climate change and other pressures; 7. To conserve and enhance the villages and market towns of the National

Park as thriving centres for residents, visitors and businesses; 8. To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities; and 9. To protect and provide for local businesses including farming, forestry and tourism that are broadly compatible with and relate to the landscapes and special qualities of the National Park.

Implications for Plan	The Plan should take account of the South Downs National Park Local Plan. In particular, when considering the appropriateness of proposed development the Plan authors should give due consideration to the purposes and duty of the National Park.
Implications for SA	The purposes and duty of the National Park and the objectives in the Local Plan should be encompassed within the objectives of the SA.

South East Coastal Group (2006) SMP11: South Foreland to Beachy Head: Shoreline management plan. [07, 08]

Summary	This is a non-statutory policy document for coastal defence management planning. It promotes management policies for a coastline into the 22nd century, to achieve long-term objectives, while being technically sustainable, environmentally acceptable and economically viable. It seeks to achieve the following (relevant) objectives: To define the flooding and erosion risks to people and the developed, historic and natural environment within the SMP area over the next century; To inform planners, developers and others of the risks identified within the SMP and preferred SMP policies when considering future development of the shoreline and land use changes. It contains three specific policies of relevance: Policy Unit 4c17: River Rother: Hold the Line Provide continued flood protection and ensure ongoing operability of Rye Harbour. Relates to Port of Rye; 15A Newhaven Harbour: Hold the line to protect existing port development; and 9B Shoreham Harbour Mouth to Aldrington: Hold the Line to protect existing port infrastructure and development.
Implications for Plan	The Plan should be prepared on the basis of the hold the line policy which will maintain existing buildings, landscape and land-use. Any additional facilities or change in extraction levels in these areas should take into account environmental and traffic impacts. The Plan should also consider the storm beach gravel deposits at Rye.
Implications for SA	The SA objectives should reflect costal management objectives set out in the management plan.

South East Coastal Group (2006) SMP12: Beachy Head to Selsey Bill: Shoreline management plan. [07, 08]

Summary	This is a non-statutory policy document for coastal defence management planning. The review of the management plan was commissioned to take account of: Latest coastal studies and monitoring information; Issues identified by most recent defence planning (i.e. coastal defence strategy plans which have now been produced to cover most of the SMP area); Changes in legislation (e.g. European Union Habitats Directive); And, changes in national food and coastal defence planning policy requirements (e.g. the need to consider a timeframe of at least 100 years rather than the original 50 years).
Implications for Plan	The Plan should be prepared on the basis that Hold the line policy will maintain existing buildings, landscape and land-use. Any additional facilities or change in extraction levels in these areas should take into account environmental and traffic

impacts.

Implications for SA The SA objectives should reflect costal management objectives set out in the management plan.

Shared Intelligence (for South East Local Enterprise Partnership) (2014) East Sussex Growth Strategy (2014 - 2020). [16, 17]

Summary The Growth Strategy sets out the South East Local Enterprise Partnership (SELEP) vision for a more innovative, productive and faster growing East Sussex economy. The Growth Strategy is owned by 'Team East Sussex', the East Sussex sub-board of the South East Local Enterprise Partnership (SELEP). Under the three strategic objectives of business, place and people, the strategy has the following priorities: Capitalise on current and emerging sector opportunities; Support more business start-ups and business growth; Enable the delivery of an appropriate pipeline of suitable business premises and upgrading existing premises; Improve and promote the quality of the built environment; Enhance the visitor offer to attract more visitors and promote the county as a tourist destination; Enable the provision of a choice of good quality and affordable housing; Enhance physical and virtual connectivity; Promote East Sussex as a business location; Achieve better alignment of skills provision to meet the needs of local employers; Increase the number of people in the workforce with high level skills; And, Improve work readiness, including soft and basic skills.

With the exception of promoting the proposal for the Newhaven Enterprise Zone, the remaining actions are non-spatial or are supporting existing plans.

Implications for Plan The authors of the Plan should be aware of the priorities of the strategy.

Implications for SA The SA objectives should support the objectives of the strategy as far as is possible under the scope of waste and minerals development.

South East Local Enterprise Partnership (2014) South East LEP - Growth Deal and Strategic Economic Plan. [16, 17]

Summary The Strategic Economic Plan sets out the priorities for the South East Local Enterprise Partnership. It proposes a new six year programme of investment in business related infrastructure including transport and delivery of extra measures to deliver business growth, backed by the necessary investment in additional housing and communities. Projects of particular relevance include: the promotion of the Newhaven CleanTech & Maritime Growth Corridor.

Implications for Plan The Plan should complement and not conflict with the Strategic Economic Plan.

Implications for SA None.

South East Water (2013) Water Resources Management Plan (Draft). [07, 08]

Summary Describes the challenges for water resources to 2030 in the region and proposes solutions to both reduce demand for water, and increase supply of water. The area is predicted to be in water deficit, where demand surpasses supply by the end of the period, unless measures are taken to increase supply. South East Water proposing to increase supply through methods such as desalination; increasing groundwater resources, with new resources proposed at Forest Row, Coggins Mills and Cowbeach; improving existing water treatment works at Barcombe; water re-use schemes and

increasing the capacity at Arlington Reservoir.

Implications for Plan The Plan policies should consider the impact upon water resources, should be aware of the challenges regarding water resources and seek to reduce consumption of water where possible. The Plan should be aware of proposals for new water resources and consider impact of development on potential new resources.

Implications for SA The SA should ensure that water resource issues are covered by the SA framework.

Southern Water (2012) *Water Resources Management Plan*. [07, 08]

Summary This plan describes the challenges for water resources to 2030 in the region and proposes solutions to both reduce demand for water, and increase supply of water. Southern Water intends to re-open a borehole in the East Sussex area by 2031 to help increase supply, and build pipelines to help move water around. In addition, it is proposing catchments management schemes to help reduce the amount of nitrates in the water abstracted, and reduce leakages, particular in the Hastings area.

Implications for Plan The Plan should consider the impact upon water resources, should be aware of the challenges regarding water resources and seek to reduce consumption of water where possible. The Plan should be aware of proposals for new water resources and consider impact of development on potential new resources.

Implications for SA The SA should ensure that water resource issues are covered by the SA framework.

Sussex Biodiversity Partnership (1998) *A Biodiversity Action Plan for Sussex*. [cc]

Summary Key objectives are: To maintain, and where practicable enhance, the wildlife and habitats that give Sussex its character and natural diversity; To identify priority habitats and species which are important to us in Sussex and/or where we have a special responsibility to care for something, which is important on a national or international scale; To set realistic, but ambitious, targets and timescales for priority habitats and species and to monitor progress of action plans against those targets; and to ensure that biodiversity action continues as a joint initiative, evolving a dynamic framework for nature conservation. The action plan has been intermittently undated since 1997, however the key objectives remain the same.

Implications for Plan The WMLP should acknowledge and support this action plan by integrating its objectives and policies. This primarily includes ensuring that priority habitats and species are not adversely affected.

Implications for SA The SA should include objectives to protect and enhance biodiversity. Inclusion of indicators relating to local habitats, threatened species and designated areas e.g. quality of SSSIs may also be appropriate.

United Nations Educational, Scientific and Cultural Organization (2012) *Brighton and Lewes Downs UNESCO Biosphere [Designation]*. [14]

Summary The Brighton & Lewes Downs Biosphere was designated by UNESCO's International Coordinating Council in 2014. The Brighton & Lewes Downs Biosphere area covers all of the land and near-shore coastal waters between the two rivers of the Adur in the west and the Ouse in the east. The northern boundary of the South Downs National Park marks its northern limits, while it also includes the city of Brighton & Hove and neighbouring towns of Lewes, Newhaven, Peacehaven, Shoreham, Telscombe,

Southwick and Shoreham Beach. Extending two nautical miles out to sea, it also includes part of one of the first 'Marine Conservation Zones' designated by the Government last year. Biosphere Reserves are internationally recognised by UNESCO as "sites of excellence" to balance conservation and socio-economic development between nature and people, and explore and demonstrate innovative approaches as learning sites for sustainable development. Biosphere Reserves are not statutory restrictive protected areas, but are places where people work together to pursue "win-win" solutions that improve our quality of life and local economy whilst enhancing the local environment.

The objectives of the Biosphere are to: Conserve and enhance nature; Support sustainable human development and Promote environmental awareness, knowledge, learning and engagement. In particular, the Biosphere seek to promote: Nature Conservation - improving urban green spaces with wildflowers, and creating 'rain gardens' for ground water quality and flood alleviation; Sustainable Socio-Economic Development - promoting water efficiency, active travel, outdoor recreation and eco-tourism; And, Environmental Awareness - actively engaging local people, delivering learning in schools, and working with universities to build knowledge.

A Biosphere Management Strategy (2014 to 2019) has been prepared since the designation was announced.

Implications
for Plan

The Plan should, where appropriate, support the objectives of the Biosphere.

Implications
for SA

The SA should seek to promote the objectives of the Biosphere within the designated area.

Wealden District Council (2013) Wealden District Core Strategy Local Plan (2013 - 2027). [cc]

Summary

The vision: "By 2030 Wealden will have successfully accommodated growth to meet the future needs whilst protecting and enhancing its essential rural character and high quality environment and promoting the countryside as a resource for recreation and tourism. Its market towns will have been regenerated providing opportunities for residents to access suitable housing, local jobs, services, facilities and recreational opportunities and a number of its villages and rural settlements will have enhanced their sustainability through successful growth including provision of affordable housing."

There are 15 Spatial Planning objectives which support the vision. These are based around the following themes: Countryside resources and development of the rural economy whilst protecting biodiversity and geodiversity; Protection of historic environment, heritage and cultural assets and encourage sustainable tourism; Housing need and economic prosperity; Viability of the 5 principle towns improving retail and service functions; Learning needs and skills; Economic prosperity and employment opportunities; Reduce the need to travel by car by centralising development; Village networks; Climate Change; Flooding; Open space, leisure and recreation facilities creating a network of green infrastructure; Safety and levels of crime; High quality, safe and attractive living environments; Maximise the use of previously developed land; and Identifying infrastructure requirements.

Implications
for Plan

The Wealden DPD should inform the Plan in producing sustainable aims and policies.

Implications
for SA

SA objectives should reflect and not be in conflict with the plans objectives.

Wealden District Council (2017) Wealden Local Plan (Draft Proposed

Submission. [cc]

Summary Work commenced on the Wealden Local Plan in 2015, as required by Policy WCS1 contained within the adopted Wealden Core Strategy (February 2013). When adopted, the Wealden Local Plan will supersede the policies contained within adopted Wealden District Affordable Housing Delivery Local Plan 2016, Wealden District Core Strategy Local Plan February 2013 for the part of the District outside of the South Downs National Park, and the adopted Wealden Local Plan 1998.

The vision: "By 2028 Wealden District will remain a rural and attractive part of the South East with new housing and employment growth around the existing urban areas of South Wealden. Retail opportunities will be made available in Uckfield and Hailsham. Road improvements and public transport provision will support our growing economy and encourage new businesses to establish here. This will in turn provide good quality jobs and opportunities for local people to improve skills. Those unique qualities of rural Wealden, which we have always treasured, will be retained and supported through agriculture, rural diversification and tourism, its beauty continuing to attract entrepreneurs and visitors alike. Development will seek to address economic need and re balance housing stock reflecting the need to improve affordability in the area, meet the needs of those wishing to downsize or take their first step on the housing ladder and make the best use of land. Local infrastructure will be put in place for the existing community and to meet the demands of new development."

There are 13 Spatial Planning objectives which support the vision. These are based around the following themes: Housing; Economy; Skills; Town Centres; Countryside; Tourism; Natural Environment; Built Environment; Accessibility; Rural Housing; Brownfield Land; Health, Wellbeing and Communities; Infrastructure; and Climate Change and Flood Risk.

This document also includes alterations to conservation area designations.

Implications for Plan The Draft Wealden Local should be used to inform the Plan in producing sustainable aims and policies.

Implications for SA The SA objectives should reflect and avoid conflict with the plans objectives.

West Sussex County Council and South Downs National Park Authority (2018)
West Sussex Joint Minerals Local Plan. [05]

Summary The West Sussex Joint Minerals Local Plan (MLP) is a draft Minerals Local Plan Document. It sets out the quantity of minerals which will be produced and the sites which will supply them. It contains 14 strategic objectives, these are: 1. To promote the prudent and efficient supply and use of minerals, having regard to the market demand and constraints on supply in the Plan area; 2. To maximise and prioritise the supply and use of secondary and recycled aggregates before supply and use of primary sources; in particular to reduce reliance on land-won aggregates; 3. To make provision for soft sand to meet the needs of West Sussex from outside the South Downs National Park, where possible; and only make provision for a declining amount of extraction within the SDNP over the Plan period; 4. To protect the South Downs National Park by only providing for silica sand from within it in exceptional circumstances and when in the public interest; 5. To protect and maintain the existing mineral development sites and infrastructure including capacity for importation of minerals via the ports of Littlehampton and Shoreham and the railheads at Chichester, Crawley and Ardingly; 6. To safeguard potential economically viable mineral resources from sterilisation; 7. To protect, and where

possible enhance, the health and amenity of residents, businesses and visitors; 8. To conserve and enhance the landscape and townscape character of West Sussex and the special qualities of the South Downs National Park and the local distinctiveness and character of the High Weald AONB and Chichester Harbour AONB and the settings of all protected landscapes; 9. To protect and, where possible, enhance the natural and historic environment and resources of West Sussex; 10. To minimise the risk to people and property from flooding; to safeguard water resources, including aquifers and surface waters, from contamination; to ensure the quality and quantity of the water environment is conserved and enhanced; 12. To protect the environment and local communities in West Sussex from unacceptable impacts of any proposal for oil and gas development, whilst recognising the national commitment to maintain and enhance energy security in the UK; 13. To ensure high quality mitigation and restoration to appropriate after uses; and 14. To minimise carbon emissions and to adapt to, and to mitigate the potential adverse impacts of, climate change.

The MLP was subject to Public Examination in September 2017. The Inspector's report has not been published at the time of writing this entry.

Implications
for Plan

The Shoreham Port is partly within East Sussex and partly within West Sussex. The Plan should be informed by the content of the MLP. It should also compliment and not conflict with the MLP.

Implications
for SA

The objectives of the MLP should be encompassed within the SA objectives. The SA should ensure that the Plan does not conflict with the MLP.

Table of Documents by Objective

Cross Cutting

Legislation (UK)

Environment Act 1995, c.25, London: TSO. [cc]

Localism Act 2011, c.20, London: TSO. [cc]

Town and County Planning (Local Planning) (England) Regulations 2012, SI 2012/767, London: TSO. [cc]

Growth and Infrastructure Act 2013, c.27, London: TSO. [cc]

Town and County Planning (General Permitted Development) (England) Order 2015 (as amended), SI 2015/596, London: TSO. [cc]

Housing and Planning Act 2016, c.27, London: TSO. [cc]

Neighbourhood Planning Act 2017, c.20, London: TSO. [cc]

European Union (Withdrawal) Act 2018, c. 16, London: TSO. [cc]

Documents

Adur District Council (2017) Adur Local Plan. [cc]

Brighton & Hove City Council (2005) Brighton & Hove Local Plan (2005) (SAVED POLICIES). [cc]

Brighton & Hove City Council (2014) Brighton and Hove Sustainable Community Strategy: Creating the City of Opportunities. [cc]

Brighton & Hove City Council (2015) Brighton & Hove Statement of Community Involvement. [cc]

Brighton & Hove City Council (2015) Brighton & Hove Sustainability Action Plan. [cc]

Brighton & Hove City Council (2016) Brighton & Hove City Plan Part One. [cc]

Brighton & Hove City Council (2018) Brighton & Hove City Plan Part Two (Draft). [cc]

Department for Communities and Local Government (2012) Planning practice guidance. [cc]

Department for Communities and Local Government (2017) Housing White Paper - Fixing our broken housing market (Cm 9352). [cc]

Department for Business, Energy & Industrial Strategy (2017) Industrial Strategy White Paper: building a Britain fit for the future. [cc]

Department for Environment, Food & Rural Affairs (2005) The UK Government Sustainable Development Strategy (Cm.6467). [cc]

Department of Environment, Food and Rural Affairs (2011) Marine Policy Statement. [cc]

Department for Environment, Food & Rural Affairs (2017) Air quality plan for nitrogen dioxide (NO2) in the UK (2017). [cc]

Department for Exiting the European Union (2017) The United Kingdom's exit from and new partnership with the European Union White Paper. [cc]

Department of Energy & Climate Change (2009) UK Low Carbon Transition Plan: National Strategy for Climate Change and Energy, The. [cc]

East Sussex County Council (2018) East Sussex Statement of Community Involvement. [cc]

East Sussex County Council (2019) Neighbourhood Plans in the Plan Area (Placeholder Document). [cc]

East Sussex County Council, Brighton & Hove City Council & South Downs National Park Authority (2013) East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan. [cc]

- East Sussex County Council, Brighton & Hove City Council & South Downs National Park Authority (2017) East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan. [cc]
- East Sussex Strategic Partnership et al. (2008) Pride of Place Working Towards a Better Future for Local People and Local Communities. A Sustainable Community Strategy for East Sussex. [cc]
- East Sussex Strategic Partnership (2011) Environment Strategy for East Sussex. [cc]
- Eastbourne Borough Council (2013) Eastbourne Core Strategy. [cc]
- Eastbourne Borough Council (2016) Eastbourne Employment Land Local Plan. [cc]
- Eastbourne Borough Council (2019) Eastbourne's Direction of Travel: Issues and Options for the Eastbourne Local Plan. [cc]
- Hastings Borough Council (2015) Hastings Development Management Plan. [cc]
- Hastings Borough Council (2014) Hastings Planning Strategy, The. [cc]
- HM Treasury (2010) National Infrastructure Plan: October 2010. [cc]
- HM Treasury (2012) National Infrastructure Delivery Plan 2016-2021. [cc]
- Lewes District Council (2003) Lewes District Local Plan. [cc]
- Lewes District Council and South Downs National Park Authority (2016) Lewes District Local Plan: Part 1 - Joint Core Strategy 2010-2030. [cc]
- Lewes District Council (2017) Lewes Local Plan Part 2: Site allocations and development management policies (Pre-submission). [cc]
- Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework. [cc]
- Newhaven Enterprise Zone (2018) Newhaven Enterprise Zone Strategic Framework. [cc]
- Newhaven Port Authority (2012) Newhaven Port Masterplan. [cc]
- Rother District Council (2006) Rother District Local Plan. [cc]
- Rother District Council (2014) Rother Local Plan: Core Strategy. [cc]
- Rother District Council (2019) Rother Local Plan: Development and Site Allocations (DASA). [cc]
- South Downs National Park Authority (2019) South Downs Local Plan. [cc]
- Sussex Biodiversity Partnership (1998) A Biodiversity Action Plan for Sussex. [cc]
- Wealden District Council (2013) Wealden District Core Strategy Local Plan (2013 - 2027). [cc]
- Wealden District Council (2017) Wealden Local Plan (Draft Proposed Submission). [cc]

Objective 1: To Avoid negative effects and enhance positive effects on health.

Legislation (UK)

Health and Social Care Act 2012, c.7, London: TSO. [01]

Documents

DEFRA (2004) Review of Environmental and Health Effects of Waste Management: Municipal Solid Waste and Similar Wastes. [01]

Ministry of Housing, Communities & Local Government (2012) National Design Guide. [01, 02, 09, 13]

Public Health England (2016) Working Together to Promote Active Travel: A briefing for local authorities. [01, 11]

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

Documents

Brighton & Hove City Council, East Sussex County Council and West Sussex County Council (2013) *Air quality and emissions mitigation guidance for Sussex authorities*. [02]

Brighton & Hove City Council, East Sussex County Council and West Sussex County Council (2013) *Planning Noise Advice Document: Sussex*. [02]

Department for Environment, Food & Rural Affairs (2010) *Noise Policy Statement for England*. [02]

Department for Environment, Food & Rural Affairs (2014) *Noise Action Plan Agglomerations*. [02]

Ministry of Housing, Communities & Local Government (2012) *National Design Guide*. [01, 02, 09, 13]

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

Legislation (European Union)

Council Directive 2000/76/EC of 4 December 2000 on the Incineration of Waste. [03, 04]

Council Directive 2008/98/EC of 12 December 2008 on Waste and repealing certain Directives. [03, 04]

Council Directive 2012/19/EU of 4 July 2012 on Waste Electrical and Electronic Equipment (WEEE). [03, 04]

Council Directive 2018/851 of 30 May 2018 on Amending Directive 2008/98/EC on Waste (Text with EEA relevance). [03, 04]

Council Directive 2019/904 of 5 June 2019 on reduction of the impact of Certain plastic products on the environment (Text with EEA relevance). [03, 04]

Documents

Brighton & Hove City Council (2010) *Brighton & Hove Municipal Waste Management Strategy*. [03, 04]

DEFRA (2007) *Waste Strategy for England*. [03, 04]

Department of Environment, Food and Rural Affairs (2012) *National Policy Statement for Waste Water*. [03, 04]

Department for Environment, Food and Rural Affairs (2014) *Energy from waste: A guide to the debate (revised edition)*. [03, 04]

East Sussex County Council et al. (2014) *East Sussex Joint Waste Management Strategy*. [03, 04]

European Commission (2005) *EU Thematic Paper: Taking sustainable use of resources forward: A Thematic Strategy on the prevention and recycling of Waste*. [03, 04]

Objective 4: To minimise waste generation and disposal to land.

Legislation (European Union)

Council Directive 2000/76/EC of 4 December 2000 on the Incineration of Waste. [03, 04]

Council Directive 2008/98/EC of 12 December 2008 on Waste and repealing certain Directives. [03, 04]

Council Directive 2012/19/EU of 4 July 2012 on Waste Electrical and Electronic Equipment (WEEE). [03, 04]

Council Directive 2018/851 of 30 May 2018 on Amending Directive 2008/98/EC on Waste (Text with EEA relevance). [03, 04]

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European Commission (2005) EU Thematic Paper: Taking sustainable use of resources forward: A Thematic Strategy on the prevention and recycling of Waste. [03, 04]

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

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Adur District Council et al. (2016) Statement of Common Ground between the Shoreham Harbour Planning Authorities and the Shoreham Port Authority. [05]

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Marine Management Organisation (2018) South Inshore and South Offshore Marine Plan. [05]

West Sussex County Council and South Downs National Park Authority (2018) West Sussex Joint Minerals Local Plan. [05]

Objective 6: To maintain and improve water quality.

Legislation (European Union)

Council Directive 91/271/EEC of 21 May 1991 on Urban Waste-Water Treatment. [06]

Council Directive 2000/60/EC of 22 December 2000 on establishing a framework for Community action in the field of water policy. [06]

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Environment Agency (2006) Underground, under threat: The state of groundwater in England and Wales. [06]

Environment Agency (2016) South East river basin district river basin management plan. [06]

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

Legislation (UK)

Flood & Water Management Act 2010, c.99, London: TSO. [07, 08]

Documents

Brighton & Hove City Council (2015) Brighton & Hove Local Flood Risk Management Strategy. [07, 08]

East Sussex County Council (2016) East Sussex Local Flood Risk Management Strategy 2016 - 2026. [07, 08]

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Environment Agency (2009) Medway: Catchment flood management plan. [07, 08]

Environment Agency (2009) Ouse, Sussex: Catchment flood management plan. [07, 08]

Environment Agency (2009) Rother and Romney: Catchment flood management plan. [07, 08]

Environment Agency (2009) Water for people and the environment Water Resources Strategy for England and Wales. [07, 08]

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South East Coastal Group (2006) SMP12: Beachy Head to Selsey Bill: Shoreline management plan. [07, 08]

South East Water (2013) Water Resources Management Plan (Draft). [07, 08]

Southern Water (2012) Water Resources Management Plan. [07, 08]

Objective 8: To reduce risk and impact of flooding.

Legislation (UK)

Flood & Water Management Act 2010, c.99, London: TSO. [07, 08]

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Southern Water (2012) Water Resources Management Plan. [07, 08]

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

Legislation (UK)

Climate Change Act 2008, c.27, London: TSO. [09]

Documents

Department for Environment, Food and Rural Affairs (2006) Climate Change: The UK Programme (CM 6764). [09]

Department of Energy and Climate Change (2010) Beyond Copenhagen (Cm 7850). [09]

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Ministry of Housing, Communities & Local Government (2012) National Design Guide. [01, 02, 09, 13]

Objective 10: To protect air quality and reduce air pollution.

Documents

Adur District Council (2005) Adur District Council AQMA. [10]

Brighton & Hove City Council (2013) Brighton & Hove AQMA 2013. [10]

Department for Environment, Food and Rural Affairs (2007) Air Quality Strategy for England, Scotland, Wales and Northern Ireland. [10]

Lewes District Council (2005) Lewes AQMA 2005 [Designation]. [10]

Lewes District Council (2008) Newhaven AQMA 2008 [Designation]. [10]

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

Documents

Brighton & Hove City Council (2015) Local Transport Plan 2015. [11]
Department for Transport (2012) National Policy Statement - Ports. [11]
East Sussex County Council (2011) East Sussex Local Transport Plan 3 (2011-2026). [11]
Public Health England (2016) Working Together to Promote Active Travel: A briefing for local authorities. [01, 11]

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

Documents

Council of the European Union (2012) European Thematic Strategy for Soil Protection. [12]
Department of Environment, Food & Rural Affairs (2011) Safeguarding our soils: A strategy for England. [12]

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

Legislation (UK)

National Parks and Countryside Act 1949, c.97, London: TSO. [13]
Environment Protection Act 1990, c.49, London: TSO. [13]

Documents

Department of Environment, Food & Rural Affairs (2010) English national parks and the broads: UK government vision and circular 2010. [13]
East Sussex County Council (2016) East Sussex Landscape Character Assessment. [13]
High Weald AONB Joint Advisory Committee (2019) The High Weald Area of Outstanding Natural Beauty Management Plan 2019-2024 (4th ed). [13]
Ministry of Housing, Communities & Local Government (2012) National Design Guide. [01, 02, 09, 13]
South Downs National Park Authority (2011) South Downs Integrated Landscape Character Assessment (ICLA). [13]
South Downs National Park Authority (2014) Partnership Management Plan: Shaping the future of your South Downs National Park 2014-2019. [13]

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

International Conventions / Treaties

Convention on Wetlands of International Importance especially as Waterfowl Habitat. Ramsar (Iran), 2 February 1971. UN Treaty Series No. 14583. As amended by the Paris Protocol, 3 December 1982, and Regina Amendments, 28 May 1987. [14]

Legislation (European Union)

Council Directive 92/43/EEC of 21 May 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora. [14]

Council Directive 2009/147/EC of 30 November 2009 on Conservation of Wild Birds. [14]

Legislation (UK)

Natural Environment and Rural Communities Act 2006, c. 16, London: TSO. [14]

Conservation of Habitats and Species Regulations 2010, SI 2010/490, London: TSO. [14]

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Brighton & Hove City Council (2012) *Brighton & Hove Local Biodiversity Action Plan, The*. [14]

Department of Environment, Food and Rural Affairs (2011) *Biodiversity 2020: A strategy for England's wildlife and ecosystem services*. [14]

Department for Environment, Food and Rural Affairs (2011) *The Natural Choice: securing the value of nature (White Paper)* (CM 8082). [14]

Department for Environment, Food & Rural Affairs (2013) *Government forestry policy statement*. [14]

United Nations Educational, Scientific and Cultural Organization (2012) *Brighton and Lewes Downs UNESCO Biosphere [Designation]*. [14]

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

Legislation (European Union)

Council Directive 2018/2001 of 11 December 2018 on promotion of the use of energy from renewable sources (Text with EEA relevance.). [15]

Documents

Department of Energy & Climate Change (2009) *Renewable Energy Strategy*. [15]

Department of Energy & Climate Change (2011) *Overarching National Policy Statement for Energy (EN-1)*. [15]

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Department of Energy & Climate Change (2011) *National Policy Statement for Renewable Energy Infrastructure (EN-3)*. [15]

Department of Trade and Industry (2006) *The Energy Challenge Energy Review Report 2006*. [15]

Department of Trade and Industry (2007) *Meeting the Energy Challenge - A White Paper on Energy*. [15]

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

Documents

Peter Brett Associates for Brighton & Hove City Council (BHCC) and Brighton & Hove Economic Partnership (2013) Brighton & Hove Economic Strategy (2013-2018). [16, 17]

Coast to Capital Local Enterprise Partnership (2014) Strategic Economic Plan. [16, 17]

Shared Intelligence (for South East Local Enterprise Partnership) (2014) East Sussex Growth Strategy (2014 - 2020). [16, 17]

South East Local Enterprise Partnership (2014) South East LEP - Growth Deal and Strategic Economic Plan. [16, 17]

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

Documents

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Coast to Capital Local Enterprise Partnership (2014) Strategic Economic Plan. [16, 17]

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Council Directive 92/43/EEC of 21 May 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora. [14]

Council Directive 2000/76/EC of 4 December 2000 on the Incineration of Waste. [03, 04]

Council Directive 2000/60/EC of 22 December 2000 on establishing a framework for Community action in the field of water policy. [06]

Council Directive 2008/98/EC of 12 December 2008 on Waste and repealing certain Directives. [03, 04]

Council Directive 2009/147/EC of 30 November 2009 on Conservation of Wild Birds. [14]

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Environment Act 1995, c.25, London: TSO. [cc]

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Localism Act 2011, c.20, London: TSO. [cc]

Health and Social Care Act 2012, c.7, London: TSO. [01]

Town and County Planning (Local Planning) (England) Regulations 2012, SI 2012/767, London: TSO. [cc]

Growth and Infrastructure Act 2013, c.27, London: TSO. [cc]

Town and County Planning (General Permitted Development) (England) Order 2015 (as amended), SI 2015/596, London: TSO. [cc]

Housing and Planning Act 2016, c.27, London: TSO. [cc]

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Annex B: Sustainability Indicators

The tables below set out the updated baseline indicators for the objectives set. Comparative data is set out within the tables in *italics with shaded background*.

Where indicators previously appeared in more than one objective, these are now only cited within the primary objective.

If no data was available, the entry for that value is empty, for example the Brighton & Hove 2013-15 life expectancy.

Sustainability Objective 1 - To improve the health of people living and working in East Sussex and Brighton and Hove.

The following indicators are used within this topic:

- Life expectancy at birth;
- Health deprivation - proportion of population living in 20% most deprived Super Output Areas nationally (health domain) (see map 2); and
- Pollution incidents (air, land and water).

Life Expectancy at birth

Male	2006-08	2007-09	2008-10	2009-11	2010-12	2011-13	2012-14	2013-15
Brighton & Hove	7.6	77.2	77.8	78.5	78.7	78.8	79.0	
Eastbourne	78.5	78.7	78.2	78.5	78.7	79.9	80.1	80.1
Hastings	76.3	76.6	77.2	76.7	77.5	77.2	77.9	77.2
Lewes	80.3	80.6	80.6	80.7	80.9	80.6	81.1	80.9
Rother	79.4	79.6	79.7	79.9	80.1	80.0	80.0	79.7
Wealden	80.5	80.8	80.4	80.6	81.0	81.3	81.6	81.5
England & Wales	77.8	78.1	78.4	78.8	79.1	79.4	79.5	79.5

Female	2006-08	2007-09	2008-10	2009-11	2010-12	2011-13	2012-14	2013-15
Brighton & Hove	82.2	82.2	82.8	82.6	83.0	83.1	83.5	
Eastbourne	82.7	83.3	83.4	83.6	83.5	83.3	83.2	83.1
Hastings	80.5	80.7	80.8	81.0	81.2	81.6	81.7	82.2
Lewes	83.8	84.2	84.4	84.9	84.8	85.1	85.7	85.4
Rother	83.3	83.5	83.8	83.6	83.9	83.9	84.2	83.8
Wealden	83.7	84.3	84.1	84.5	84.2	84.7	84.9	84.8
England & Wales	81.9	82.2	82.4	82.8	82.9	83.1	83.2	83.1

Source: Office for National Statistics (2015) *Life Expectancy at Birth and at Age 65 for the UK and Local Areas in England and Wales*. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/lifeexpectancies/datasets/lifeexpectancyatbirthandage65bylocalareasintheunitedkingdomtable1ukandlocalareasinenglandandwales> (Accessed 6 November 2017)

Health deprivation - proportion of population living in 20% most deprived Super Output Areas nationally (health domain) (see map 2);

	2007	2010	2015
Brighton & Hove	25.2%	43.5%	13.56%
East Sussex	11.8%	38.5%	7.50%
Eastbourne	16.9%	35.1%	5.31%
Hastings	42.0%	58.7%	18.24%
Lewes	0.0%	31.0%	0.00%
Rother	6.8%	15.5%	1.51%
Wealden	0.9%	0.0%	0.00%

Source [2015]: Department for Communities and Local Government (2015) *English indices of deprivation 2015*. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2015> (Accessed 18 October 2017).

Pollution incidents (air, land and water).

	2009	2010	2011	2012	2013	2014	2015	2016
Brighton & Hove	1	2	0	0	0	0	1	1
Eastbourne	1	1	1	0	0	1	1	0
Hastings	0	0	3	0	0	2	1	0
Lewes	1	0	4	3	2	5	0	2
Rother	2	3	0	1	3	1	1	0
Wealden	1	4	4	1	5	2	1	0

Source: Environment Agency (2017) *Environmental Pollution Incidents*. Available at:
<https://data.gov.uk/dataset/environmental-pollution-incidents> (Accessed: 1 October 2017).

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

The following indicators are used within this topic:

- Areas of Remoteness (see map 9); and
- Population density (persons per hectare)

Public open space was included within the WMSP SA, but the monitoring has been discontinued, and it has therefore been excluded.

Areas of Remoteness (see map 9)

Population density (persons per hectare)

Year	East Sussex	Brighton & Hove	Eastbourne	Hastings	Lewes	Rother	Wealden	South East
2011	3.06	32.05	21.87	29.33	3.32	1.76	1.79	4.53
2012	3.09	32.38	22.03	29.38	3.36	1.76	1.81	4.57
2013	3.11	32.65	22.14	29.52	3.39	1.76	1.83	4.60
2014	3.14	33.00	22.36	29.63	3.41	1.78	1.86	4.65
2015	3.16	33.49	22.56	29.76	3.43	1.80	1.88	4.69
2016	3.18	33.96	22.69	30.00	3.45	1.81	1.89	4.73

Sources: [Population]: Office for National Statistics (2017) *Population estimates - local authority based by single year of age*. Available at: <http://www.nomisweb.co.uk> (Accessed: 6 November 2017). [Local Authority Areas] Ordnance Survey (2017) *Boundary-Line (Vector)*. Available at: <https://www.ordnancesurvey.co.uk/opendatadownload/products.html#BDLINE> (Accessed: 27 October 2017).

Sustainability Objective 3 - To improve equality and access to sustainable waste management.

The following indicators are used within this topic:

- Number of waste management facilities.

Monitoring of the percentage of households served by kerbside collection of recyclable materials was discontinued during 2011; consequently this measure has been excluded.

Number of waste management facilities

	2013	2017
Total Number	103	100
Household Waste Recycling Centres	10	10

Source: East Sussex County Council (2016) *East Sussex Annual Monitoring Report 2015/16, Appendix F*. Available at: <https://www.eastsussex.gov.uk/environment/planning/development/amr1/> (Accessed: 17 October 2017).

Sustainability Objective 4 - To minimise waste generation and disposal to land.

The indicators under this topic had been rationalised into the following groupings:

Tonnage of Waste

- Local Authority Collected (LACW) Waste¹
- Household Waste
- Commercial and Industrial Waste (Combined Estimate) (C&I (CE))
- Commercial and Industrial Waste (Management Method Estimate) (C&I (MM))
- Construction and Demolition Arisings (CDEW); and
- Hazardous Waste Arisings.

Disposal Method of Local Authority Collected (LACW) Waste

- % recycled;
- % reuse;
- % composted;
- % energy recovery;
- % incineration without energy recovery; and
- % disposed to land.

Disposal Method of Commercial and Industrial Waste

- % reused, recycled or composted;
- % recovered; and
- % disposed to land.

Disposal Method of Construction and Demolition Waste

- % recycled;
- % disposed to land; and
- % alternative disposal methods.

Estimated Available Capacity for Waste Management

- Recycling;
- Composting;
- Recovery;
- Non-Hazardous Landfill;
- Inert-Landfill;

¹ Formerly Municipal Solid Waste (MSW).

Tonnage of Waste

Plan Area

Year (Apr-Mar)	LACW	Household	C&I (CE)	CDEW	Year (Jan-Dec)	C&I (MM)	Hazardous
2006/07	.	371,017	.	.	2006	.	21,853
2007/08	381,614	362,994	.	.	2007	.	22,740
2008/09	371,145	352,731	475,000	906,000	2008	458,721	21,545
2009/10	366,744	348,214	No Data	No Data	2009	377,296	19,286
2010/11	365,740	348,589			2010	341,898	16,994
2011/12	359,991	342,382			2011	412,201	23,146
2012/13	359,690	340,498			2012	426,825	30,629
2013/14	357,995	343,489			2013	422,353	28,092
2014/15	365,145	348,891			2014	462,189	39,122
2015/16	380,120	365,811			2015	450,822	32,260
2016/17					2016		40,416

South East England

Year (Apr-Mar)	LACW	Household	C&I (CE)	CDEW	Year (Jan-Dec)	C&I (MM)	Hazardous
2006/07	4,598,000	4,263,000	No Data	No Data	2006	No Data	477,042
2007/08	4,563,000	4,242,000			2007		532,116
2008/09	4,328,000	4,038,000			2008		587,635
2009/10	4,230,000	3,937,000			2009		505,870
2010/11	4,230,000	3,920,000			2010		500,765
2011/12	4,146,000	3,852,000			2011		620,790
2012/13	4,066,000	3,797,000			2012		540,811
2013/14	4,224,000	3,920,000			2013		505,050
2014/15	4,278,000	3,966,000			2014		577,257
2015/16					2015		578,491
2016/17					2016		647,479

England

Year (Apr-Mar)	LACW	Household	C&I (CE)	CDEW	Year (Jan-Dec)	C&I (MM)	Hazardous
2006/07	29,144,000	25,775,000	No Data	No Data	2006	No Data	
2007/08	28,506,000	25,287,000			2007		5,383,842
2008/09	27,334,000	24,334,000			2008		5,670,474
2009/10	26,541,000	23,666,000			2009		3,653,760
2010/11	26,200,000	23,454,000			2010		2,871,758
2011/12	25,419,000	22,899,000			2011		3,300,906
2012/13	24,955,000	22,580,000			2012		3,299,775
2013/14	25,518,000	22,967,000			2013		3,009,440
2014/15	25,737,000	23,169,000			2014		3,518,125
2015/16					2015		3,738,710
2016/17					2016		3,746,549

Sources:

Source for Local Authority Collected Waste, Household Waste and Commercial & Industrial (Management Method) Estimate: [Plan Area]: East Sussex County Council (2017) East Sussex Waste and Minerals Monitoring Report 2015/16. Available at: <https://www.eastsussex.gov.uk/environment/planning/development/amr1/> (Accessed: 20 October 2017).

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Source for Commercial and Industrial (Combined Method) Estimate: AEA (2011) Review of Future Waste Management Capacity Requirements - East Sussex and Brighton & Hove, page 22. Available at: <http://consult.eastsussex.gov.uk/file/2267274> (Accessed: 20 October 2017).

Source for Construction, Demolition & Excavation Waste Estimate AEA (2011) Review of Future Waste Management Capacity Requirements - East Sussex and Brighton & Hove, page 47. Available at: <http://consult.eastsussex.gov.uk/file/2267274> (Accessed: 20 October 2017).

Source for Hazardous waste arisings: [2016]: Environment Agency (2017) *Hazardous Waste Interrogator 2016*. Available at: <https://data.gov.uk/dataset/hazardous-waste-interrogator-2016> (Accessed: 18 October 2017). **[2015]:** Environment Agency (2016) *Hazardous Waste Interrogator 2015*. Available at: <https://data.gov.uk/dataset/hazardous-waste-interrogator-2015> (Accessed: 18 October 2017). **[2014]:** Environment Agency (2015) *Hazardous Waste Interrogator 2014*. Available at: <https://data.gov.uk/dataset/hazardous-waste-interrogator-2014> (Accessed: 18 October 2017). **[2013]:** Environment Agency (2014) *Hazardous Waste Interrogator 2013*. Available at: <https://data.gov.uk/dataset/hazardous-waste-interrogator-2013> (Accessed: 18 October 2017). **[2012]:** Environment Agency (2013) *Hazardous Waste Interrogator 2012*. Available at: <https://data.gov.uk/dataset/hazardous-waste-interrogator-2012> (Accessed: 18 October 2017). **[2011]:** Environment Agency (2012) *Hazardous Waste Interrogator 2011*. Available at: <https://data.gov.uk/dataset/hazardous-waste-interrogator-2011> (Accessed: 18 October 2017). **[2010]:** Environment Agency (2011) *Hazardous Waste Interrogator 2010*. Available at: <https://data.gov.uk/dataset/hazardous-waste-interrogator-2010> (Accessed: 18 October 2017). **[2009]:** Environment Agency (2010) *Hazardous Waste Interrogator 2009*. Available at: <https://data.gov.uk/dataset/hazardous-waste-interrogator-2009> (Accessed: 18 October 2017). **[2008]:** Environment Agency (2009) *Hazardous Waste Interrogator 2008*. Available at: <https://data.gov.uk/dataset/hazardous-waste-interrogator-2008> (Accessed: 18 October 2017). **[2007]:** Environment Agency (2008) *Hazardous Waste Interrogator 2007*. Available at: <https://data.gov.uk/dataset/hazardous-waste-interrogator-2007> (Accessed: 18 October 2017). **[2006]:** Environment Agency (2016) *Hazardous Waste Interrogator 2006*. Available at: <https://data.gov.uk/dataset/hazardous-waste-interrogator-2006> (Accessed: 18 October 2017).

Disposal Method of Local Authority Collected (LACW) Waste

Plan Area

Year (Mar-April)	Recycled	Reuse	Composted	Energy Recovery	Incineration without energy recovery	Disposal to Land
2006/07	18.9%	2.8%	8.0%	2.1%	0.0%	68.2%
2007/08	21.3%	2.7%	8.7%	10.0%	0.0%	57.4%
2008/09	21.7%	2.6%	10.0%	19.9%	0.0%	45.8%
2009/10	21.3%	2.4%	11.3%	26.2%	0.0%	38.9%
2010/11	21.3%	1.9%	12.0%	24.6%	0.0%	40.2%
2011/12	20.6%	2.0%	13.4%	43.2%	0.0%	20.7%
2012/13	20.2%	2.8%	13.5%	57.4%	0.0%	6.2%
2013/14	22.1%	3.0%	12.4%	56.9%	0.0%	5.6%
2014/15	22.9%	3.4%	11.2%	59.2%	0.0%	3.2%
2015/16	25.9%	3.3%	10.4%	55.7%	0.0%	4.7%
2016/17						

Source: East Sussex County Council (2017) East Sussex Waste and Minerals Monitoring Report 2015/16. Available at: <https://www.eastsussex.gov.uk/environment/planning/development/amr1/> (Accessed: 20 October 2017)

Disposal Method of Commercial and Industrial Waste

Plan Area

Year (Mar-April)	Recycled or Composted	Recovered	Disposal to Land
2008/09	67.4%	3.6%	29.0%

Source [2008/09]: AEA (2011) Review of Future Waste Management Capacity Requirements - East Sussex and Brighton & Hove, page 32. Available at: <http://consult.eastsussex.gov.uk/file/2267274> (Accessed: 20 October 2017)

Disposal Method of Construction and Demolition Waste

Plan Area

Year (Mar-April)	Recycled	Disposal to Land	Alternative Methods
2008/09	45.0%	15.0%	40.0%

Source [2008/09]: AEA (2011) Review of Future Waste Management Capacity Requirements - East Sussex and Brighton & Hove, page 54. Available at: <http://consult.eastsussex.gov.uk/file/2267274> (Accessed: 20 October 2017)

Estimated Available Capacity for Waste Management

Plan Area - (Tonnes per Annum)

	Waste and Minerals Plan	01/04/2012	01/04/2013	01/04/2014	01/04/2015	01/04/2016
Recycling & Composting	490,000	502,320	545,335	564,135	609,995	566,522
Bulk Metal (e.g. Scrapyards)	441,000	440,323	440,323	440,323	434,764	434,764
Recovery	210,000	210,000	210,000	210,000	210,000	210,000*
CDEW Recycling	630,000	648,995	669,278	724,278	725,118	742,278
Specialist Treatment (Hazardous)	61,000	71,429	71,429	71,429	71,709	71,709

Plan Area - (Void space in cubic metres)

	Waste and Minerals Plan	01/04/2012	01/04/2013	01/04/2014	01/04/2015	01/04/2016
Inert Landfill (including inert for beneficial use WMP8b)	15,000	15,000	57,620	17,400	15,000	15,000
Non-Hazardous (including Stable Non-Reactive Hazardous Wastes) Landfill	150,000	150,000	30,000	0	0	0
Hazardous Landfill	0	0	0	0	0	0

Source: East Sussex County Council (2017) East Sussex Waste and Minerals Monitoring Report 2015/16. Available at: <https://www.eastsussex.gov.uk/environment/planning/development/amr1/> (Accessed: 20 October 2017)

Sustainability Objective 5 - To ensure the most sustainable use of minerals resources.

As more minerals data has become available, partly due to operators lifting confidentiality constraints, the following separate updated aggregate indicators are used in this section organised under supply/production, imports and consumption. These cover the last 10 years in line with requirements for the LAA.

It should be noted coverage of data is not always complete, some figures are estimates, and consumption does not necessarily equate with imports and supply.

Data on clay has been removed as it has not been available for at least 10 years and there is no prospect of new data being available at the moment. Sales data would not be that useful in terms of an indicator. Figures for clay reserves (life time) would be more useful and consideration will be given in future to sourcing this data. Clay sales have, therefore been removed as an indicator.

Aggregate Supply/Production

- Supply of land-won sand and gravel (tonnes)
- Annual production (tonnes) of secondary and recycled aggregates (estimate)
- Secondary aggregates (Produced)

Aggregate Imports

- Rail imports of land-won sand and gravel
- Landings of marine dredged sand and gravel
- Landings of crushed rock
- Rail imports of crushed rock
- Rail imports of recycled aggregates
-

Aggregate Consumption

- Land -won aggregates in the Plan Area
- Marine-dredged aggregates in the Plan Area
- Crushed rock in the Plan area

Where there are empty values this mean there is no data.

Aggregate Supply/Production

Year	Sand and Gravel - Land-won (Supply) in Plan area	Sand and Gravel - Land-won (Supply) in South East	Recycled aggregates (Produced Estimate) in Plan area	Secondary aggregates (Produced) in Plan area	Recycled and Secondary aggregates (Produced) in South East
2006	c				
2007	311,797	8,502			3,600
2008	312,118	7,299	240000		3,300
2009	359,745	6,007	240000		
2010	359,250	6,091	240000		2,900
2011	199, 032*	5,824	240000	68000	2,800
2012	353,371	5,514	240000	< 75,000	2,900
2013	414,348	5,399	240000	< 75,000	3,700
2014	441,987	5,889	240000	< 75,000	3,628
2015	343,818	5,857	240000	< 75,000	4,223
2016	324,703	5,900	240000	< 75,000	4,034

* Production started in East Sussex.

Aggregate Imports

Year	Sand and gravel - Land-won (imports by rail)	Sand and Gravel - Marine dredged (landings) in the Plan area	Sand and Gravel - Marine dredged (imports) in the Plan area	Crushed Rock (Imports by sea) in the Plan Area	Crushed Rock (Imports by sea) in the South East	Crushed Rock (Imports by rail) in the Plan area	Crushed Rock (Imports by rail) in the South east	Crushed Rock (Total Imports)	Recycled aggregates (Imports by rail)
2006	n/a	202, 000		117, 000		n/a			n/a
2007	n/a	217, 000		181000	2,780	n/a	4,085		n/a
2008	n/a	205000		145000	2,305	n/a	3,340		n/a
2009	n/a	106000		145000	1,452	n/a	2,576	???	n/a
2010	n/a	155000		129000	1,881	n/a	3,027		n/a
2011	n/a	n/a		c	1,944	n/a	3,269		n/a
2012	n/a	78000		n	1,476	n/a	3,087		n/a
2013	n/a	27000		c	1,528	n/a	3,509		n/a
2014	n/a	0	650, 000	c	1,466	45, 852	4,056	280, 000	1, 550
2015	735	0		c	2,177	99, 579	4,040		24 505
2016	19, 248	8000		52000	2,596	74 602	3,667		35 658

Aggregate Consumption

Year	Consumption in Plan Area (Land won)	Consumption in South East (Land won)	Consumption in Plan Area (Marine)	Consumption in South East (Marine)	Consumption in Plan Area (crushed rock)	Consumption in South East (crushed rock)
2006						
2007						
2008						
2009	80, 000	5 679 000	618, 000	4 700 000	199 000	5 383 000
2010						
2011						
2012						
2013						
2014	263, 000	5 623 000	657,000	6 448 000	280 000	7 126 000
2015						
2016						

Sources: East Sussex County Council et al. (2016) East Sussex, South Downs and Brighton & Hove Local Aggregate Assessment, page 17. Available at: <https://www.eastsussex.gov.uk/environment/planning/development/amr1/> (Accessed: 24 October 2017); East Sussex County Council et al. (2016) Waste and Minerals Monitoring Report. Available at: <https://www.eastsussex.gov.uk/environment/planning/development/amr1/> (Accessed: 24 October 2017).

Sustainability Objective 6 - To maintain and improve water quality.

The following indicators are used within this topic:

- Bathing Water Quality;
- Ecological and chemical classification for surface waters; and
- Groundwater vulnerability (see map 8)

The first three indicators are no longer available and have been replaced with the indicator of Bathing Water Quality.

Ecological and Chemical Classification for Surface Waters

River	Year	Number of water bodies	Ecological status or potential					Chemical status	
			Bad	Poor	Moderate	Good	High	Fail	Good
Rother	2015 Cycle 2	41	0	8	25	8	0	0	41
	2016 Cycle 2	41	0	7	26	8	0	0	41
Cuckmere and Pevensey Levels	2015 Cycle 2	18	0	6	11	1	0	1	17
	2016 Cycle 2	18	0	5	12	1	0	0	18
Adur and Ouse	2015 Cycle 2	46	4	18	23	1	0	0	46
	2016 Cycle 2	46	6	17	21	2	0	0	46
Medway	2015 Cycle 2	58	3	9	42	4	0	1	57
	2016 Cycle 2	58	4	7	43	4	0	3	55

Source: Environment Agency (2018) *Catchment Data Explorer*. Available at: <http://environment.data.gov.uk/catchment-planning/> (Accessed: 28 February 2018).

Bathing Water Quality

Plan Area

Quality	2013	2014	2015	2016
Excellent	7	8	10	9
Good	5	5	4	5
Sufficient	1	0	0	0
Poor	1	1	0	0
Closed	0	0	0	0
Insufficiently sampled	n/a	n/a	n/a	n/a

Source: Environment Agency (2017) Bathing water data. Available at: <http://environment.data.gov.uk/bwq/profiles/data.html> (Accessed: 25 October 2017).

Groundwater vulnerability (see map 8)

Indicates areas where groundwater resources are vulnerable to pollution. Aquifers are classified according to the properties of the rocks and the overlying soils. Areas most vulnerable 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. Water consumption from Water is provided in the plan area by South East Water and Southern Water. The Environment Agency considers the South East as a 'water stressed area'.

Source: Environment Agency (2015) *Groundwater Vulnerability [GIS Dataset]* Available at: <http://environment.data.gov.uk/ds/partners/> (Accessed: 29 November 2017).

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

The following indicators are used within this topic:

- Water consumption from commercial and industrial customers [No Data]
- Water efficiency (litres per person per day)

Water consumption from commercial and industrial customers

Monitoring the consumption from commercial and industrial customers would be desirable, but no data is available at this time.

Water efficiency (litres per person per day)

	2011/12	2012/13	2013/14	2014/15	2015/16
Southern Water	156.7	143.4	140.8	134.8	132
England & Wales Industry Average	145.8	140.1	141.5	138.6	139.6

Source: Consumer Council for Water (2016) Delving into Water 2016: Performance of the water companies in England and Wales 2011-12 to 2015-16, page 42. <https://www.ccwater.org.uk/wp-content/uploads/2016/11/Delving-into-water-2016.pdf> (Accessed: 25 October 2017).

Sustainability Objective 8 – To reduce risk and impact of flooding.

The following indicators are used within this topic:

- Properties in the extreme flood outline (1 in 1000 year flood or 0.1% probability)
- Flood Risk Areas in Plan Area (see Map 7)

Properties in the extreme flood outline (1 in 1000 year flood or 0.1% probability)

	2006	2009	2010
Brighton & Hove	932	934	n/a
East Sussex	27,093	27136	27,661

Source: East Sussex in Figures (2011) *Properties in the extreme flood outline (1 in 1000 year flood or 0.1% probability)*. Available

at: http://www.eastsussexinfigures.org.uk/webview/velocity?mode=cube&cube=http%3A%2F%2Fwww.eastsussexinfigures.org.uk%3A80%2Fobj%2Fcube%2F732_C1 (Accessed 25 October 2017).

Flood Risk Areas in Plan Area (see Map 7)

This map depicts the probability of sea and river (main rivers) flooding only, ignoring the presence of existing defences. It is only indicative of flood zones 3 and 2, flood zone 1 being all the land falling outside zones 3 and 2. It does not show all forms of flood risk in the Plan area. Other forms of flooding include; flooding from land, groundwater, sewers and other artificial sources (e.g. reservoirs, canals, lakes). The Strategic Flood Risk Assessment provides more detailed information, covers all forms of flooding and including allowances for climate change.

Source: East Sussex County Council (Unpublished) Draft East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan Review - Strategic Flood Risk Assessment (December 2017). Unpublished.

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

The following indicators are used within this topic:

- Carbon dioxide emissions Total emissions in kilotonnes
- Carbon dioxide emissions Total emissions per capita (tonnes)
- Carbon dioxide emissions by end user (kilotonnes)

Carbon dioxide emissions Total emissions in kilotonnes

Year	East Sussex	Brighton and Hove	Plan Area	South East	England
2005	3,196.0	1,397.8	4,593.8	56,891.6	364,543.6
2006	3,201.0	1,394.1	4,595.1	56,804.0	363,715.6
2007	3,124.4	1,365.4	4,489.8	55,644.7	354,400.9
2008	3,055.0	1,346.5	4,401.5	55,002.3	348,830.4
2009	2,816.9	1,229.1	4,046.0	50,302.5	316,599.9
2010	2,955.5	1,288.6	4,244.1	53,208.3	333,060.1
2011	2,692.0	1,156.8	3,848.8	48,344.9	301,182.3
2012	2,799.5	1,242.7	4,042.2	50,430.5	317,586.9
2013	2,729.4	1,190.9	3,920.3	48,702.5	307,574.1
2014	2,486.9	1,033.8	3,520.7	43,294.0	273,921.0
2015	2,435.7	1,006.2	3,441.9	41,956.6	262,113.5

Source: Department for Business, Energy & Industrial Strategy (2017) *2005 to 2015 UK local and regional CO2 emissions - data tables*. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2015> (Accessed: 25 October 2017).

Carbon dioxide emissions Total emissions per capita (tonnes)

Year	East Sussex	Brighton & Hove	Plan Area	South East	England
2005	6.3	5.5	6.0	6.9	7.2
2006	6.3	5.5	6.0	6.9	7.1
2007	6.1	5.3	5.8	6.7	6.9
2008	5.9	5.1	5.6	6.5	6.7
2009	5.4	4.6	5.1	5.9	6.1
2010	5.6	4.8	5.4	6.2	6.3
2011	5.1	4.2	4.8	5.6	5.7
2012	5.3	4.5	5.0	5.8	5.9
2013	5.1	4.3	4.8	5.5	5.7
2014	4.6	3.7	4.3	4.9	5.0
2015	4.5	3.5	4.1	4.7	4.8

Source: Department for Business, Energy & Industrial Strategy (2017) *2005 to 2015 UK local and regional CO2 emissions - data tables*. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2015> (Accessed: 25 October 2017).

Carbon dioxide emissions by end user (kilotonnes)

Year	Industry and Commercial	Domestic	Transport	Total
2005	1,357.0	1,910.9	1,325.9	4,593.8
2006	1,378.0	1,913.2	1,304.0	4,595.2
2007	1,321.2	1,853.9	1,314.7	4,489.8
2008	1,277.4	1,856.2	1,267.9	4,401.5
2009	1,139.0	1,682.2	1,224.8	4,046.0
2010	1,218.3	1,821.0	1,204.8	4,244.1
2011	1,087.1	1,579.4	1,182.2	3,848.7
2012	1,170.3	1,705.4	1,166.5	4,042.2
2013	1,117.6	1,650.5	1,152.1	3,920.2
2014	964.7	1,383.0	1,172.9	3,520.6
2015	916.3	1,339.5	1,186.0	3,441.8

Source: Department for Business, Energy & Industrial Strategy (2017) *2005 to 2015 UK local and regional CO2 emissions - data tables*. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2015> (Accessed: 25 October 2017).

Sustainability Objective 10 - To protect air quality and reduce air pollution.

The following indicators are used within this topic:

- Air Quality Management Areas (Designations);

The indicator 'Carbon dioxide emissions by end user' has been removed because it duplicated an indicator under Objective 9.

Air Quality Management Area (Designations) (See map 8)

In 2005 Brighton & Hove City Council declared an (AQMA) Areas (AQMA) related to exceedences of the annual average objective for nitrogen dioxide (NO₂). The area was increased in 2008 but in 2013 the boundary was redrawn which reduced the AQMA to a quarter of its previous size. Broadly speaking, the AQMA covers much of the seafront, key roads heading from the seafront into the city, and part of the city centre. Within the AQMA, nitrogen dioxide exceeds Air Quality Objectives, a pollutant usually associated with road traffic.

In 2004 Hastings Borough Council declared and AQMA related to exceedences of PM₁₀. The area encompasses properties between the junction of the A259 (Bexhill Road) and Harley Shute Road, and number 576 Bexhill Road on its northern side, and numbers 211 to 585 Bexhill Road on its southern side. This AQMA was revoked in 2017.

Lewes District Council declared an (AQMA) in Lewes in 2005 due to exceedence of the air quality objective for nitrogen dioxide (NO₂ of 40 ug/m³ in 2005). The area focuses on the Station Road, Fisher Street, West Street area of Lewes.

In 2014 a study was carried out which identified the area in and around the Newhaven Gyratory as having possible exceedences of nitrogen dioxide. An Air Quality Management Area (AQMA) was subsequently declared for the Newhaven gyratory (A259) for nitrogen dioxide.

Sources: Adur District Council (2005) *Adur District Council AQMA*. Available at: <https://www.adur-worthing.gov.uk/environmental-health/pollution/air-quality-and-pollution/local-air-quality-management/> (Accessed: 20 November 2017); Brighton & Hove City Council (2013) *Brighton & Hove AQMA 2013*. Available at: <https://www.brighton-hove.gov.uk/content/environment/noise-and-pollution/air-quality-management-city> (Accessed: 20 November 2017); Lewes District Council (2005) *Lewes AQMA 2005 [Designation]*. Available at: <http://www.lewes-eastbourne.gov.uk/environmental-problems/air-quality-and-health/> (Accessed: 20 November 2017); Lewes District Council (2008) *Newhaven AQMA 2008 [Designation]*. Available at: <http://www.lewes-eastbourne.gov.uk/environmental-problems/air-quality-and-health/> (Accessed: 20 November 2017).

Sustainability Objective 11 - To reduce adverse impacts of transporting waste and minerals by road on the environment.

The following indicators are used within this topic:

- Total freight traffic per annum - ports (thousand tonnes)
- Estimated traffic flows for all motor vehicles (million vehicle kms) (see map 1)
- Road transport energy consumption - freight traffic (kt of fuel)

The indicator 'Carbon dioxide emissions from road transport (thousand tonnes)' has been removed because it duplicated an indicator under Objective 9.

Total freight traffic per annum - ports (thousand tonnes)

	Newhaven (ES)	Rye (ES)	Shoreham (B&H)	All UK ports
2007	1,003	70	1,989	581,504
2008	1,196	58	1,792	562,166
2009	861	73	1,735	500,881
2010	824	102	1,851	511,855
2011	754	66	2,081	519,495
2012	793	35	1,904	500,860
2013	706	36	1,600	503,324
2014	699	52	1,826	503,171
2015	864	46	1,909	496,708
2016	803	60	2,086	484,048

Source: Department for Transport (2017) *UK ports and traffic (PORT01) - Table PORT0101 UK major and minor ports, all freight traffic, by port and direction, from 1965*. Available at: <https://www.gov.uk/government/statistical-data-sets/port01-uk-ports-and-traffic> (Accessed: 3 November 2017).

Estimated traffic flows for all motor vehicles (million vehicle kms) (see map 1)

	2008	2009	2010	2011	2012	2013	2014	2015	2016
Brighton & Hove	1,376	1,356	1,329	1,329	1,339	1,328	1,352	1,355	1,383
East Sussex	4,274	4,208	4,135	4,125	4,100	4,102	4,235	4,307	4,410
South East	85,035	84,121	82,906	83,303	82,980	82,842	84,961	87,037	88,958
England	428,494	424,402	417,767	418,866	417,051	418,255	429,148	436,281	445,776

Source: Department for Transport (2017) *Road traffic estimates in Great Britain: 2016 tables - TRA89: Road traffic by region and local authority - Table TRA8904: Motor vehicle traffic (vehicle kilometres) by local authority in Great Britain, annual from 1993*. Available at: <https://www.gov.uk/government/statistics/road-traffic-estimates-in-great-britain-2016> (Accessed: 2 November 2017).

Road transport energy consumption - freight traffic (kt of fuel)

	Brighton and Hove	Eastbourne	Hastings	Lewes	Rother	Wealde n	Plan Area	South East	England
2007	23.76	5.47	4.99	15.33	14.78	30.87	95.20	1,860.80	10,547.67
2008	24.47	5.64	5.21	16.17	14.76	30.86	97.10	1,823.26	10,363.09
2009	23.95	5.51	5.00	15.50	13.94	29.52	93.40	1,723.60	9,786.57
2010	24.36	5.48	5.12	14.83	13.95	29.94	93.69	1,750.15	9,863.34
2011	23.99	5.37	5.05	14.69	13.81	29.64	92.55	1,740.59	9,782.90
2012	23.32	5.09	4.86	14.52	13.60	28.84	90.24	1,725.47	9,676.38
2013	23.51	5.22	4.99	15.04	14.08	29.64	92.47	1,737.41	9,826.91
2014	24.69	5.57	5.32	15.53	14.84	31.18	97.13	1,810.68	10,196.38
2015	24.68	5.58	5.25	16.20	14.97	31.65	98.32	1,896.96	10,573.50

Source: Department for Business, Energy & Industrial Strategy (2017) *Road transport energy consumption at regional and local authority level*. Available at: <https://www.gov.uk/government/statistical-data-sets/road-transport-energy-consumption-at-regional-and-local-authority-level> (Accessed 2 November 2017).

Sustainability Objective 12 - To conserve and enhance important soil functions and types

The following indicators are used within this topic:

- Agricultural land (hectares)
- Agricultural land quality (see map 6)

Agricultural land (hectares)

	2007	2010	2013
Brighton and Hove & Lewes	25,261	25,778	27,595
Hastings & Rother	35,881	34,222	33,445
Eastbourne & Wealden	58,737	52,083	54,108
Plan Area	119,879	112,083	115,148
<i>South East England & London</i>	<i>1,208,460</i>	<i>1,140,878</i>	<i>1,158,019</i>
<i>England</i>	<i>9,291,357</i>	<i>8,887,289</i>	<i>9,086,480</i>

Source: Department for Environment, Food & Rural Affairs (2017) Structure of the agricultural industry in England and the UK at June: English geographical breakdowns - local authority <https://www.gov.uk/government/statistical-data-sets/structure-of-the-agricultural-industry-in-england-and-the-uk-at-june> (Accessed: 11 December 2017).

Agricultural land quality (see map 9)

Year: 2002	Brighton & Hove			East Sussex		South East	
	Grade	Area	% of land	Area	% of land	Area	% of land
Excellent	(1)	0	0.0%	136	0.1%	48,347	2.5%
Very Good	(2)	0	0.0%	4,450	2.6%	198,851	10.4%
Good/Mod	(3)	2,700	32.8%	104,140	60.9%	998,587	52.4%
Poor	(4)	869	10.5%	37,618	22.0%	307,979	16.1%
Very poor	(5)	0	0.0%	802	0.5%	25,379	1.3%
Non Agricultural		809	9.8%	15,437	9.0%	182,208	9.6%
Urban		3,865	46.9%	8,373	4.9%	145,963	7.7%
Total		8,243		170,956		1,907,314	

The 2013 data cited below is believed to be a republication of the 2002 published referred to above and in previous SA documents.

Source: Natural England (2013) *Provisional Agricultural Land Classification (ALC)*. Available at: <http://environment.data.gov.uk/ds/catalogue/index.jsp#/catalogue> (Accessed: 11 December 2017).

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

The following indicators are used within this topic:

- National Park and Areas of Outstanding Natural Beauty (see map 10);
- Heritage Coast;
- Statutory designated historic environment assets;
- Non-statutory designated historic environment assets;
- Historic Landscape Characterisation (HLC) and Extensive Urban Surveys (EUS); and
- East Sussex County Landscape Assessment.

The amount of available previously developed land has been removed as an indicator due to lack of new data.

National Park and Areas of Outstanding Natural Beauty (see map 10)

High Weald AONB

The High Weald AONB reaches from Horsham in the west to Hastings in the East, crosses 4 counties (West & East Sussex, Kent and a corner of Surrey), covers a total of 1457 sq. km of countryside, 11 district authorities are within the High Weald and 99 parishes have some or all of their area in the AONB, which has a population of over 120,000 one of the most populated AONB's in the country.

South Downs National Park

The South Downs National Park came into existence on 1 April 2010. It covers an area of land along the coastal strip, encompassing Brighton and Hove in the west and stretching to the outskirts of Eastbourne in the east, and inland just north of Lewes. It covers an area of over 1,600 km² and is home to more than 110,400 people. Recognised as an area of outstanding beauty, the South Downs is also home to a multitude of vibrant working communities steeped in history and traditional English culture. The Sussex Downs AONB was revoked on 31 March 2010 when the South Downs National Park came into existence.

Sources: [AONB]: Natural England (2017) *Areas of Outstanding Natural Beauty (England)*. Available at: <http://naturalengland-defra.opendata.arcgis.com/datasets/areas-of-outstanding-natural-beauty-england> (Accessed: 11 December 2017). [National Park]: Natural England (2017) *National Parks (England)*. Available at: <http://naturalengland-defra.opendata.arcgis.com/datasets/national-parks-england> (Accessed: 11 December 2017).

Heritage Coast

Heritage Coasts are a non-statutory landscape definition defined by agreement between the relevant maritime local authorities and Natural England. The coast between Seaford and Eastbourne (inland as far as the A27) forms the Sussex Downs Heritage Coast and includes Beachy Head and the Seven Sisters. It is 6 miles long and was the first to be defined in 1973. Sussex Heritage Coast has a non-statutory designation; however, the Sussex Downs AONB extends to the base of the coastal cliffs. The purpose of both designations has strong similarities and the AONB designation provides statutory protection for many features of the East Sussex Heritage Coast.

Source: Natural England (2017) *Heritage Coasts (England)*. Available at: <http://naturalengland-defra.opendata.arcgis.com/datasets/heritage-coasts-england> (Accessed: 11 December 2017)

Statutory designated historic environment assets

	Year	Brighton & Hove	East-bourne	Has-tings	Lew-es	Roth-er	Wealde n	Plan Area	Eng-land
Listed Buildings	2013	1,222	128	562	1,262	2,134	2,212	7,520	
	2017	1,226	132	567	1,266	2,136	2,229	7,556	377,819
Scheduled Monuments	2013	15	38	6	113	42	103	317	19,733
	2017	16	38	6	115	42	104	321	19,853
Wrecks	2013	0	0	1	0	1	0	2	
	2017	0	0	1	0	1	0	2	53
Registered parks / gardens	2013	5	1	2	5	7	18	38	
	2017	5	1	2	5	7	18	38	1,662
Registered Battlefields	2013	0	0	0	1	1	0	2	
	2017	0	0	0	1	1	0	2	46
Conservation Areas	2013	34	12	2	35	10	34	127	
	2017	34	12	18	35	11	41	151	

Note, the 2013 data has also been updated for accuracy and consistency with the 2017 data where possible. Counts of the above designations were based on centroids to avoid double counting. As such the numbers above should be treated as minimum values.

Sources: [Listed Buildings]: Historic England (2017) *Listed Buildings (England) (Updated 8 December 2017)* Available at: <https://historicengland.org.uk/listing/the-list/data-downloads/> (Accessed: 12 December 2017). [Scheduled Monuments]: Historic England (2017) *Scheduled Monuments (England) (Updated 8 December 2017)* Available at: <https://historicengland.org.uk/listing/the-list/data-downloads/> (Accessed: 12 December 2017). [Wrecks]: Historic England (2017) *Protected Wreck Sites (England) (Updated 8 December 2017)* Available at: <https://historicengland.org.uk/listing/the-list/data-downloads/> (Accessed: 12 December 2017). [Registered parks / gardens]: Historic England (2017) *Registered Parks and Gardens (England) (Updated 8 December 2017)* Available at: <https://historicengland.org.uk/listing/the-list/data-downloads/> (Accessed: 12 December 2017). [Registered Battlefields]: Historic England (2017) *Registered Battlefields (England) (Updated 8 December 2017)* Available at: <https://historicengland.org.uk/listing/the-list/data-downloads/> (Accessed: 12 December 2017). [Conservation Areas]: Brighton & Hove City Council, Lewes District Council, Eastbourne Borough Council, Wealden District Council, Rother District Council, and Hastings Borough Council. Data provided on request, August 2017.

Non-statutory designated historic environment assets

As at 15/11/13 there were 14,103 entries on the East Sussex Historic Environment Record (HER), covering East Sussex and Brighton and Hove. This has since increased to 33,400 records (5/12/17). The HER is a record of the known archaeology of the county and city. The HER is continually having records added and being refined as more archaeological work is carried out.

No comparative data available.

Source: [2013 & 2017]: East Sussex County Council, Environment Advice Team.

Historic Landscape Characterisation (HLC) and Extensive Urban Surveys (EUS)

HLC & EUS map time depth and change in the landscape. HLC covers all East Sussex and Brighton and Hove. EUS cover approximately 20 historic towns in East Sussex and Brighton and Hove.

Source: West Sussex County Council et al. (2016) Historic Town Characterisation: Extensive Urban Surveys. Available at: <https://www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/historic-town-characterisation/> (Accessed: 14 December 2017) (This entry consists of a number of separate documents available via the link above.); West Sussex County Council et al. (2010) Sussex Historic Landscape Characterisation. Available at: <https://www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/sussex-historic-landscape-characterisation/> (Accessed: 14 December 2017).

East Sussex County Landscape Assessment

East Sussex is covered by four regional character areas:

The High Weald

This is distinct and diverse landscape with a broken and dissected landform of ridges, ghylls and streams and east-west valleys. This is formed of small, irregular fields, abundant woods, hedges, ridge top villages, scattered settlements and sunken lanes. It is a classic patchwork country side which has remained essentially the same since medieval times. It rises to the north of the Low Weald and is the largest East Sussex landscape region occupying the northern half of the county.

The Low weald

This broad low lying, gently undulating clay vale underlies a small-scale landscape with a mix of copses and shaws, a patchwork of fields and hedgerows. In the east, this gives way to a more open and sometimes prairie - like landscape. It lies between the High Weald and the Downs, and is between 5 - 8 kms wide.

The Downs

The north facing scarp line of chalk hills provides a dramatic backdrop to the Low Weald. These are Kipling's 'blunt, bow-headed, whale-backed scarp are characterised by close cropped turf and woodland, with the dip slope supports arable farming. This is the distinct upland area between the sea and the Low Weald. Most but not all of the area is coincident with the AONB. The East Sussex Downs run from the western edge of the county to Eastbourne.

The Levels

This is an open and expansive landscape of grazed wet meadows, criss-crossed by reed filled ditches. There are few trees and hedgerows, but has a backdrop of the South Downs, and the High Weald. The landscape area is not continuous but occurs in two separate units: the Eastbourne and the Pevensey levels, and the Rye - Winchelsea area.

Source: East Sussex County Council (2016) *East Sussex Landscape Character Assessment*. Available at: <https://www.eastsussex.gov.uk/environment/landscape> (Accessed: 6 November 2017)

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

The following indicators are used within this topic:

- SSSI area by condition (hectares) (see map 12)
- Ancient woodland cover (Area recorded in Ancient Woodland Inventory) (hectares) (see map 13)
- Special Protection Areas (see map 14)
- Special Areas of Conservation (see map 14)
- Ramsar Wetlands (see map 14)
- National Nature Reserves (see map 15)
- Area of land designated a local nature reserve (hectares) (see map 15)
- Sites of Nature Conservation Importance (SNCIs) (see map 16)

SSSI area by condition (Plan Area) (hectares/pc) (see map 12)

SSSI Condition	2013		2017	
	Hectares	pc	Hectares	pc
Favourable	3,619.5	27.6%	6,363.5	38.2%
Unfavourable - Recovering	9,269.9	70.6%	10,071.0	60.4%
Unfavourable - No change	133.1	1.0%	133.1	0.8%
Unfavourable - declining	83.7	0.6%	82.9	0.5%
Part destroyed	17.8	0.1%	17.8	0.1%
Destroyed	0.0	0.0%	0.0	0.0%
Total	13,124.0	100.0%	16,668.3	100.0%

Source: [Data] Natural England (2017) *Designated Sites View - Region*. Available at: <https://designatedsites.naturalengland.org.uk/> (Accessed: 15 December 2017) [Geographic Information]: Natural England (2017) *Sites of Special Scientific Interest (England)*. Available at: <https://data.gov.uk/dataset/sites-of-special-scientific-interest-england3> (Accessed: 15 December 2017)

Ancient woodland cover (Area recorded in Ancient Woodland Inventory) (hectares) (see map 16)

	2001	2011	2017
Brighton & Hove	95	94	95
Eastbourne	0	0	22
Hastings	128	145	145
Lewes	1,019	1,156	1,156
Rother	7,595	8,055	8,054
Wealden	9,754	11,710	11,530
Plan Area	18,591	21,160	21,001
England			363,806

Source: Natural England (2017) *Ancient Woodlands (England)*. Available at: <https://data.gov.uk/dataset/ancient-woodlands-england2> (Accessed: 14 December 2017).

Special Protection Areas (see map 14)

Title	Area (ha)	General site character	Quality and importance
Ashdown Forest	3,207	50% heath scrub; 40% mixed woodland; 10% bog marsh.	Regularly supports: 1% of GB breeding population of Nightjars; and 1.30% of Dartford Warbler population.
Dungeness to Pett Level	1,474	35% improved grassland; 15% total river, estuaries, mud and sand flats; 15% shingle, sea cliff 12% inland water bodies.	Regularly supports: 9% of GB breeding population of Mediterranean Gull; 1.50% of little Terns; 2.25% of Common Terns; 2.50% of Berwick's Swans; and 1.00% of population of Northern Shovelers.

Sources: [Data]: Joint Nature and Conservation Committee for Department of Food and Rural Affairs (2018) *Summary data for UK SPAs*. Available at: <http://jncc.defra.gov.uk/page-1409> (Accessed: 23 January 2018); [Geographic Information]: Natural England (2018) *Special Protection Areas (England)*. Available at: <http://naturalengland-defra.opendata.arcgis.com/datasets/special-protection-areas-england> (Accessed: 23 January 2018).

Special Areas of Conservation (see map 14)

Site Area (ha) / Year	2013	2017
Ashdown Forest	2,729	2,728
Castle Hill	115	115
Dungeness (partially in East Sussex)	3,224	3,141
Hastings Cliffs	184	185
Lewes Down	147	150
Total	6,399	6,319

Source: Natural England (2017) *Special Areas of Conservation (England)*. Available at: <https://data.gov.uk/dataset/special-areas-of-conservation-england2> (Accessed: 14 December 2017).

Ramsar Wetlands (see map 14)

Title	Area	Characteristics
Dungeness to Pett Level	1474.04	See Dungeness to Pett Level Special Protection Area (SPA) above.
Pevensey Level Ramsar	3577.71	Pevensey Levels is one of the largest and least-fragmented lowland wet grassland systems in southeast England. The low-lying grazing meadows are intersected by a complex system of ditches which support a variety of important wetland communities, including nationally rare and scarce aquatic plants and invertebrates. The site also supports a notable assemblage of breeding and wintering wildfowl. A small area of shingle and intertidal muds and sands is included within the site.

Sources: [Geographic Information] Natural England (2017) *Natural England (2017) Ramsar (England)* Available at: <http://naturalengland-defra.opendata.arcgis.com/datasets/ramsar-england> (Accessed: 23 January 2018); [Data] Joint Nature and Conservation Committee for the Department of Food and Rural Affairs. (1999) *Pevensey Levels Information Sheet on Ramsar Wetlands*. Available at: <http://jncc.defra.gov.uk/pdf/RIS/UK11053.pdf> (Accessed: 23 January 2018).

National Nature Reserves (see map 20)

Site Area (ha)	2009	2017
Castle Hill	47	47
Lewes Downs	49	49
Lullington Heath	62	62
Pevensey Levels	182	182

Source: Natural England (2017) *National Nature Reserves (England)*. Available at: <https://data.gov.uk/dataset/national-nature-reserves-england1> (Accessed: 14 December 2017).

Area of land designated a local nature reserve (hectares) (see map 15)

	2000	2006	2009	2011	2017
Brighton & Hove	0	359			594
East Sussex	993	1,412	1,413	1,398	1,401
Plan Area		1,771			1,995
South East	7,713	8,976	9,858	9,939	10,916

Source: Natural England (2017) *Local Nature Reserves (England)* (11 July 2017). Available at: <http://naturalengland-defra.opendata.arcgis.com/datasets/local-nature-reserves-england> (Accessed: 1 December 2017)

Sites of Nature Conservation Importance (SNCIs) (see map 16)

Area	2013			2017		
	Count	Hectares	% of Area	Count	Hectares	% of Area
Brighton & Hove	62	612.3	7.30%	62	607.4	7.11%
East Sussex	304			285	9,110.5	5.28%
Plan Area	366			347	9,717.9	5.37%

Sources: BHCC: Brighton & Hove City Council (2013) *Sites of Nature Conservation Interest* [GIS Dataset]; ESCC: East Sussex County Council (2017) *Sites of Nature Conservation Interest* [GIS Dataset].

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

The following indicators are used within this topic:

- Average (Mean) gas consumption per commercial/industrial consumer (K/Wh)
- Average (Mean) electricity consumption per commercial/industrial consumer (K/Wh)

Average (Mean) Gas consumption per commercial/industrial consumer (K/Wh)

	2005	2006	2007	2010	2011	2012	2013	2014	2015
Brighton & Hove	312,636	312,148	320,373	388,228	334,437	395,407	359,168	358,536	325,701
East Sussex	350,292	362,944	369,149	374,729	364,967	364,216	377,852	418,633	381,817
Eastbourne				371,324	358,117	378,851	366,524	505,643	375,517
Hastings				292,781	265,213	295,597	295,988	282,565	279,212
Lewes				314,354	305,502	279,774	328,870	323,558	306,182
Rother				775,491	758,860	700,818	752,327	824,053	811,019
Wealden				222,352	223,794	233,931	238,644	214,359	223,099
South East	506,024	422,413	443,648	513,391	447,641	468,354	455,026	443,867	424,380
England				659,026	655,549	656,943	642,539	649,410	625,618

Source: Department for Business, Energy & Industrial Strategy (2017) *Regional and local authority gas consumption statistics: 2005 to 2015*. Available at: <https://www.gov.uk/government/statistical-data-sets/gas-sales-and-numbers-of-customers-by-region-and-local-authority> (Accessed 18 October 2017).

Average (Mean) electricity consumption per commercial/industrial consumer (K/Wh)

	2007	2008	2009	2010	2011	2012	2013	2014	2015
Brighton & Hove	41,355	41,795	41,078	41,246	39,821	40,353	40,373	38,318	41,942
Eastbourne	45,345	45,724	45,433	45,063	45,081	43,738	43,764	43,038	45,392
Hastings	39,196	39,300	39,572	40,908	39,963	40,146	40,154	38,579	38,876
Lewes	39,430	39,525	38,432	38,962	38,542	38,451	40,936	38,396	41,959
Rother	37,075	35,451	33,509	35,059	34,146	33,340	34,281	33,119	40,318
Wealden	32,272	32,719	32,843	33,306	33,427	32,941	32,867	34,101	36,478
South East	71,499	71,984	70,434	71,429	68,765	68,698	68,782	66,040	68,033
England	78,068	78,535	74,934	76,393	72,416	73,832	74,037	74,752	74,332

Source: Department for Business, Energy & Industrial Strategy (2017) *Regional and local authority electricity consumption statistics: 2005 to 2015*. Available at: <https://www.gov.uk/government/statistical-data-sets/regional-and-local-authority-electricity-consumption-statistics-2005-to-2011> (Accessed 18 October 2017).

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

The following indicators are used within this topic:

- Population (Mid Year Estimate)
- Population Projections (selected years)
- Housing completions (total)
- Future housing provision (annual average)
- Gross value added per head at current basic prices (£)

Population (Mid Year Estimate)

Year	Brighton and Hove	East Sussex	Plan Area	South East	England
2008	262,019	519,197	781,216	8,426,399	51,815,853
2009	265,584	520,370	785,954	8,490,922	52,196,381
2010	269,495	523,651	793,146	8,577,771	52,642,452
2011	272,952	527,209	800,161	8,652,784	53,107,169
2012	275,762	531,201	806,963	8,724,737	53,493,729
2013	278,112	534,402	812,514	8,792,766	53,865,817
2014	281,076	539,766	820,842	8,873,818	54,316,618
2015	285,276	544,064	829,340	8,947,913	54,786,327
2016	289,229	547,797	837,026	9,026,297	55,268,067

Source: Office for National Statistics (2017) *Population estimates - local authority based by single year of age*. Available at: <http://www.nomisweb.co.uk> (Accessed 26 October 2017)

Population Projections (selected years)

Projected Year	Brighton and Hove	East Sussex	Plan Area	South East	England
2014	281,076	539,766	820,842	8,873,818	54,316,618
2019	293,152	561,147	854,299	9,242,891	56,466,327
2024	301,755	585,093	886,848	9,596,170	58,396,289
2029	312,259	608,708	920,967	9,929,479	60,188,029
2034	322,099	630,782	952,881	10,230,525	61,800,146
2039	331,137	650,691	981,828	10,508,430	63,281,523

Source: Office for National Statistics (2017) *Population projections - local authority based by single year of age*. Available at: <http://www.nomisweb.co.uk> (Accessed 26 October 2017)

Housing completions (total)

	Brighton & Hove	Eastbourne	Hastings	Lewes	Rother	Wealden	Plan Area
2007/08	567	280	283	416	177	415	2,138
2008/09	721	387	241	257	222	349	2,177
2009/10	380	222	155	175	95	337	1,364
2010/11	283	121	77	161	200	709	1,551
2011/12	309	217	209	204	426	619	1,984
2012/13	374	161	148	80	98	674	1,535

2013/14	436	245	133	80	157	560	1,611
2014/15	581	160	167	240	177	343	1,668
2015/16			244	130	246		
2016/17					283		

Sources: [Brighton & Hove]: Brighton & Hove City Council (2016) *Annual Monitoring Report 2015/16*. Available at: <http://www.brighton-hove.gov.uk/content/planning/local-development-framework/authority-monitoring-report-amr> (Accessed 26 October 2017). [Lewes]: Lewes District Council (2017) *Authority Monitoring Report for 2015-16*. Available at: <http://www.lewes.gov.uk/planning/7194.asp> (Accessed 26 October 2017). [Wealden]: Wealden District Council (2017) *Annual Monitoring Report 2015 - 2016*. Available at: http://www.wealden.gov.uk/Wealden/Residents/Planning_and_Building_Control/Planning_Policy/Planning_Policy_Documents (Accessed 26 October 2017). [Eastbourne]: Eastbourne Borough Council (2016) *Eastbourne Authority Monitoring Report 2015-16*. Available at: <http://www.eastbourne.gov.uk/about-the-council/council-policies-plans-and-strategies/planning-policy/local-development-documents/reports/> (Accessed: 26 October 2017). [Hastings]: Hastings Borough Council (2017) *Local Plan Monitoring Report (LPMR) - Monitoring year: 2015-2016*. Available at: http://www.hastings.gov.uk/environment_planning/planning/localplan/monitoring/ (Accessed: 26 October 2017) [Rother]: Rother District Council (2017) *Local Plan Monitoring Report 2016/17*. Available at: <http://www.rother.gov.uk/AMR> (Accessed: 26 October 2017)

Future housing provision (annual average)

	Per Year	Total
Brighton & Hove	660	13,200 between 2012 and 2030
East Sussex	1,567	N/A
Eastbourne	239	5,022 between 2006 and 2027
Hastings	200	3,400 between 2011 and 2028
Lewes	345	6,900 between 2010 and 2030
Rother	335	5,700 between 2011 and 2028
Wealden	448	9400 between 2006 and 2027

Sources: [Brighton & Hove]: Brighton & Hove City Council (2016) *Brighton & Hove City Plan Part One*. Available at: <http://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-one> (Accessed: 26 October 2017) [Lewes]: Lewes District Council (2016) *Lewes District Local Plan Part 1: Joint Core Strategy 2010-2030*. Available at: <http://www.lewes.gov.uk/corestrategy/> (Accessed 26 October 2017) [Wealden]: Wealden District Council (2013) *Wealden District (Incorporating Part of the South Downs National Park) Core Strategy Local Plan*. Available at: http://www.wealden.gov.uk/Wealden/Residents/Planning_and_Building_Control/Planning_Policy/CoreStrategy/Planning_Core_Strategy_Local_Plan.aspx (Accessed 26 October 2017). [Eastbourne]: Eastbourne Borough Council (2013) *Eastbourne Core Strategy Local Plan*. Available at: <http://www.eastbourne.gov.uk/about-the-council/council-policies-plans-and-strategies/planning-policy/development-plan/eastbourne-core-strategy-local-plan/about/> (Accessed 26 October 2017). [Hastings]: Hastings Borough Council (2014) *Shaping Hastings - Hastings Local Plan: The Hastings Planning Strategy 2011 - 2028*. Available at: <https://www.hastings.gov.uk/planning/policy/adoptedlocalplan/strategy/> (Accessed 26 October 2017). [Rother]: Rother District Council (2014) *Rother Local Plan Core Strategy*. Available at: <http://www.rother.gov.uk/corestrategy> (Accessed: 26 October 2017).

Gross value added per head at current basic prices (£)

Year	Brighton & Hove	East Sussex	South East	England
2007	20,874	13,999	21,636	20,681
2008	21,030	14,047	21,877	20,992
2009	20,301	13,573	21,266	20,531
2010	20,703	14,063	21,898	21,054
2011	20,914	14,371	22,369	21,349
2012	22,369	16,589	25,509	23,828
2013	23,276	16,587	26,287	24,567
2014	24,770	17,538	27,214	25,624
2015	24,989	18,301	27,847	26,159

Source: Office for National Statistics (2016) *Regional Gross Value Added (Income Approach)* Available at: <https://www.ons.gov.uk/economy/grossvalueaddedgva/datasets/regionalgrossvalueaddedincomeapproach> (Accessed: 26 October 2017).

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

The following indicators are used within this topic:

- Employment deprivation (% of LSOAs in 20% most deprived in England) (see map 18);
- Employment rate (% of working age population in employment);
- Workforce skills (percentage of working age population by qualification level) (see map 15); and
- Percentage of working age population with no qualifications.

Data relating to the number of people employed in the waste and minerals industries is difficult to obtain and has been removed from this SA.

Employment deprivation (% of LSOAs in 20% most deprived in England) (see map 17)

	2007	2010	2015
Brighton & Hove	20%	18%	16%
Eastbourne	15%	22%	13%
Hastings	42%	49%	19%
Lewes	0%	2%	9%
Rother	12%	16%	12%
Wealden	1%	2%	7%

Source [2015]: Department for Communities and Local Government (2015) *English indices of deprivation 2015*. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2015> (Accessed 18 October 2017).

Employment rate (% of working age population in employment)

	08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17
Brighton & Hove	78%	78%	75%	77%	77%	79%	79%	77%	80%
Eastbourne	76%	80%	85%	80%	78%	82%	80%	73%	80%
Hastings	76%	79%	75%	73%	72%	74%	75%	71%	73%
Lewes	80%	79%	79%	78%	80%	77%	78%	79%	84%
Rother	76%	75%	78%	74%	73%	75%	70%	75%	76%
Wealden	80%	82%	75%	78%	80%	81%	80%	81%	81%
Total	78%	79%	77%	77%	77%	78%	77%	76%	79%
England	77%	77%	76%	77%	77%	77%	78%	78%	78%
South East	80%	80%	79%	79%	79%	80%	80%	80%	81%

Source: Office for National Statistics (2017) *Annual Population Survey: Economic activity rate - aged 16-64 (April - March)*. Available at: <http://www.nomisweb.co.uk/> (Accessed 17 October 2017).

Workforce skills (% of working age population by qualification level)

Plan area	2008	2009	2010	2011	2012	2013	2014	2015	2016
% with NVQ4+	32%	35%	38%	38%	37%	39%	43%	38%	41%
% with NVQ3+	52%	54%	56%	58%	57%	58%	62%	58%	61%
% with NVQ2+	70%	72%	73%	74%	75%	75%	79%	75%	78%
% with NVQ1+	83%	84%	86%	86%	87%	87%	91%	87%	90%
% with other qualifications (NVQ)	7%	8%	6%	5%	6%	6%	4%	5%	4%
% with no qualifications (NVQ)	10%	8%	8%	9%	7%	7%	5%	7%	5%

England	2008	2009	2010	2011	2012	2013	2014	2015	2016
% with NVQ4+	28.3%	29.6%	31.0%	32.5%	34.1%	34.9%	35.7%	36.7%	37.9%
% with NVQ3+	45.6%	46.9%	48.7%	50.5%	53.1%	53.8%	54.8%	55.6%	56.8%
% with NVQ2+	63.4%	64.9%	66.9%	69.3%	71.7%	72.4%	73.2%	73.4%	74.2%
% with NVQ1+	77.5%	78.8%	80.2%	82.7%	84.1%	84.5%	85.1%	85.0%	85.5%
% with other qualifications (NVQ)	9.1%	9.0%	8.7%	6.9%	6.4%	6.3%	6.2%	6.6%	6.7%
% with no qualifications (NVQ)	13.3%	12.1%	11.1%	10.5%	9.5%	9.2%	8.6%	8.4%	7.8%

Source: Office for National Statistics (2017) *Annual Population Survey: % with NVQ4+ - aged 16-64; % with NVQ3+ - aged 16-64; % with NVQ2+ - aged 16-64; % with NVQ1+ - aged 16-64; % with other qualifications (NVQ) - aged 16-64; % with no qualifications (NVQ) - aged 16-64*. Available at: <http://www.nomisweb.co.uk/> (Accessed 18 October 2017).

Percentage of working age population with no qualifications

	2012	2013	2014	2015	2016
Brighton & Hove	6.1%	4.6%	3.7%	5.6%	3.3%
Eastbourne	13.0%	11.7%	8.4%	8.5%	6.0%
Hastings	11.8%	13.0%	9.4%	9.4%	11.7%
Lewes	6.9%	10.0%	5.6%	7.0%	4.9%
Rother	7.2%	8.9%	5.3%	9.0%	5.1%
Wealden	5.6%	7.6%	4.0%	9.6%	5.2%
England	9.50%	9.20%	8.60%	8.40%	7.80%

Source: Office for National Statistics (2017) *Annual Population Survey: % with no qualifications (NVQ) - aged 16-64*. Available at: <http://www.nomisweb.co.uk/> (Accessed 18 October 2017).

Annex C: Maps

The Maps in this section depict the information detailed in the Annex B - Sustainability Baseline.

Crosscutting

- Map 1 - Urban / built up areas and transport links (2017)
- Map 2 - Index of Multiple Deprivation 2015 (Overall) (Lower Super Output Areas) (2015)

Objective 1

- Map 3 - Index of Multiple Deprivation, Health deprivation and disability (Lower Super Output Areas) (2015)

Objective 2

- Map 4 - Areas of Remoteness (2012)

Objective 6

- Map 5 - Groundwater Vulnerability Zones (2017)
- Map 6 - Source Protection Zones (2015)

Objective 8

- Map 7 - Flood Zone 2, Flood Zone 3 and River Line (SFRA) (2017)

Objective 10

- Map 8 - Air Quality Management Areas (2016)

Objective 12

- Map 9 - Agricultural Land Quality (2013)

Objective 13

- Map 10 - Area of Outstanding Natural Beauty and South Downs National Park (2017)
- Map 11 - Heritage Coastline (2015)

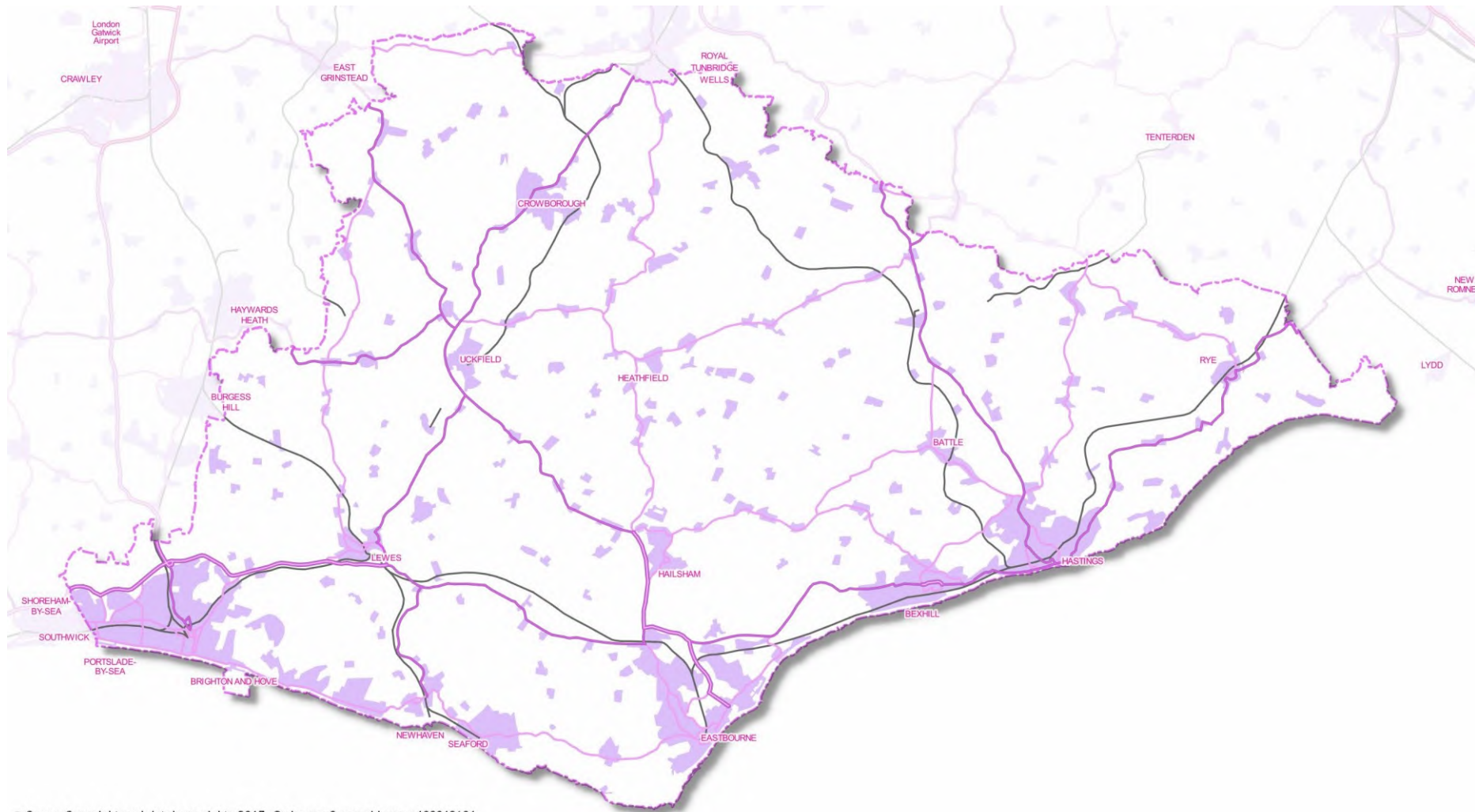
Objective 14

- Map 12 - Site of Special Scientific Interest (by condition) (2017)
- Map 13 - Ancient Woodland (2017)
- Map 14 - Special Areas of Conservation, Special Protection Areas, and Ramsar Areas (2017)
- Map 15 - National Nature Reserves and Local Nature Reserves (2017)
- Map 16 - Sites of Nature Conservation Interest (2013/2017 [BH/ES])

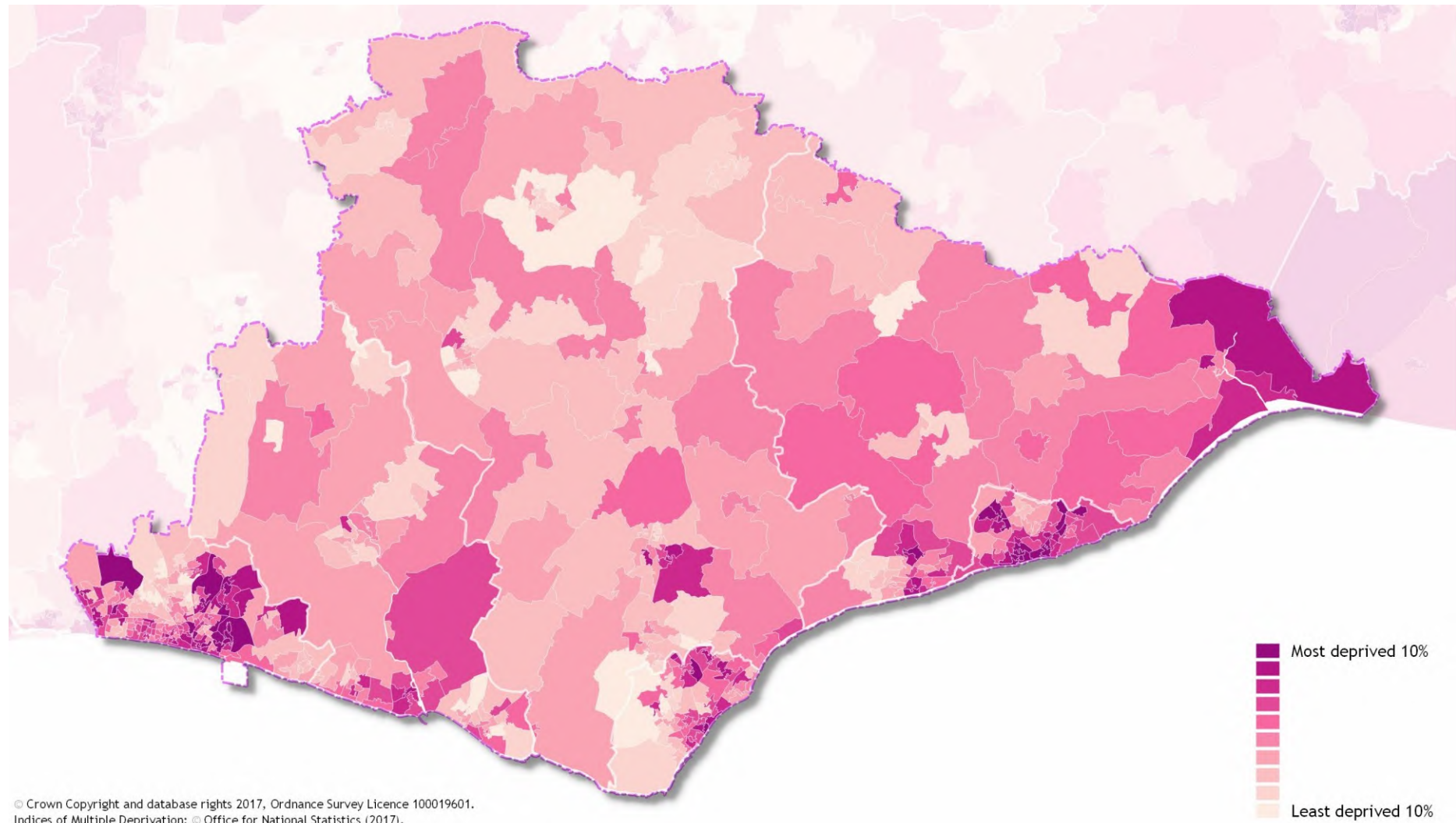
Objective 17

- Map 17 - Index of Multiple Deprivation, Employment Domain (Lower Super Output Areas) (2015)
- Map 18 - Index of Multiple Deprivation, Education, skills and training Domain (Lower Super Output Areas) (2015)

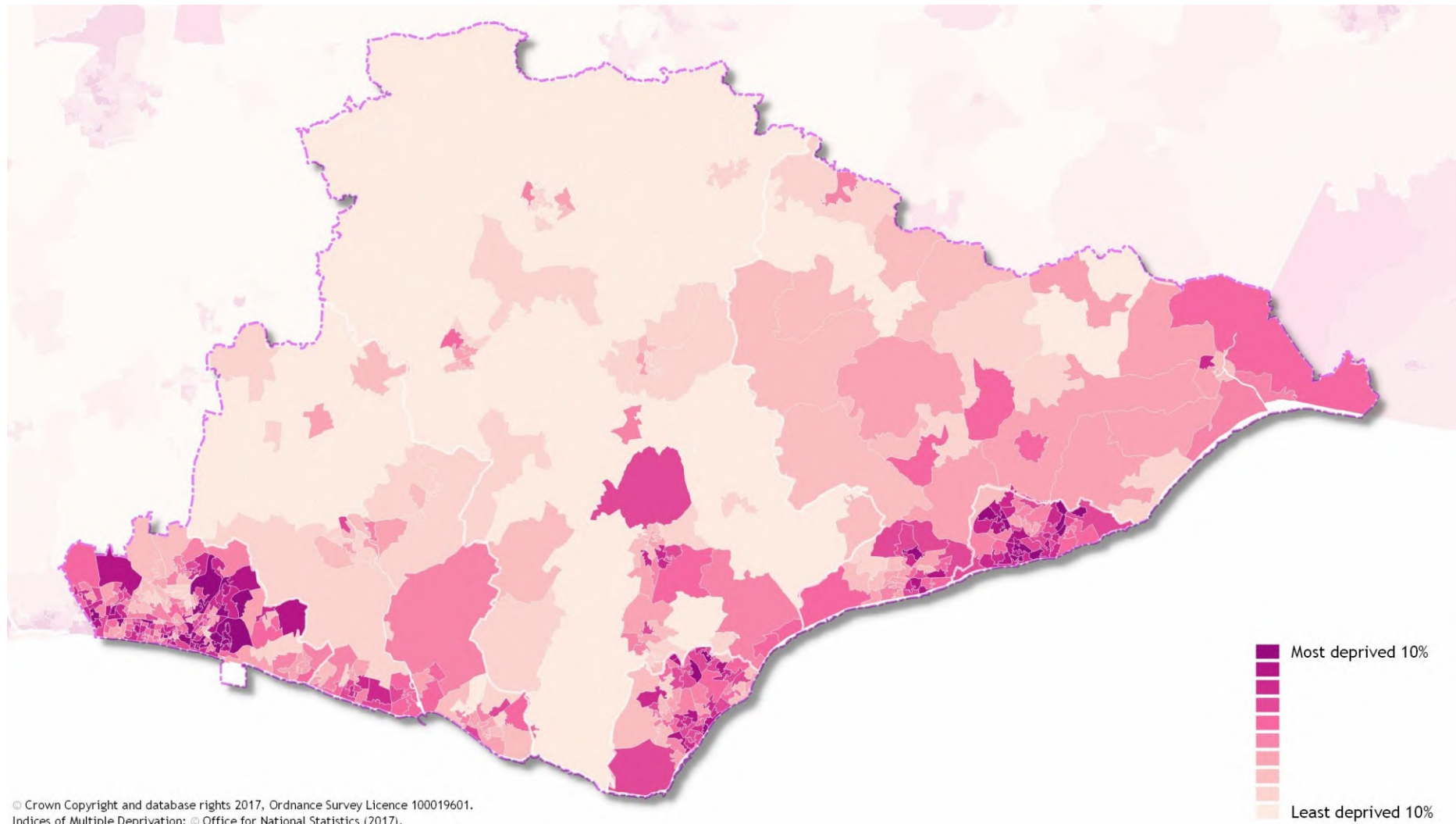
Map 1 - Urban / built up areas and transport links (2017)



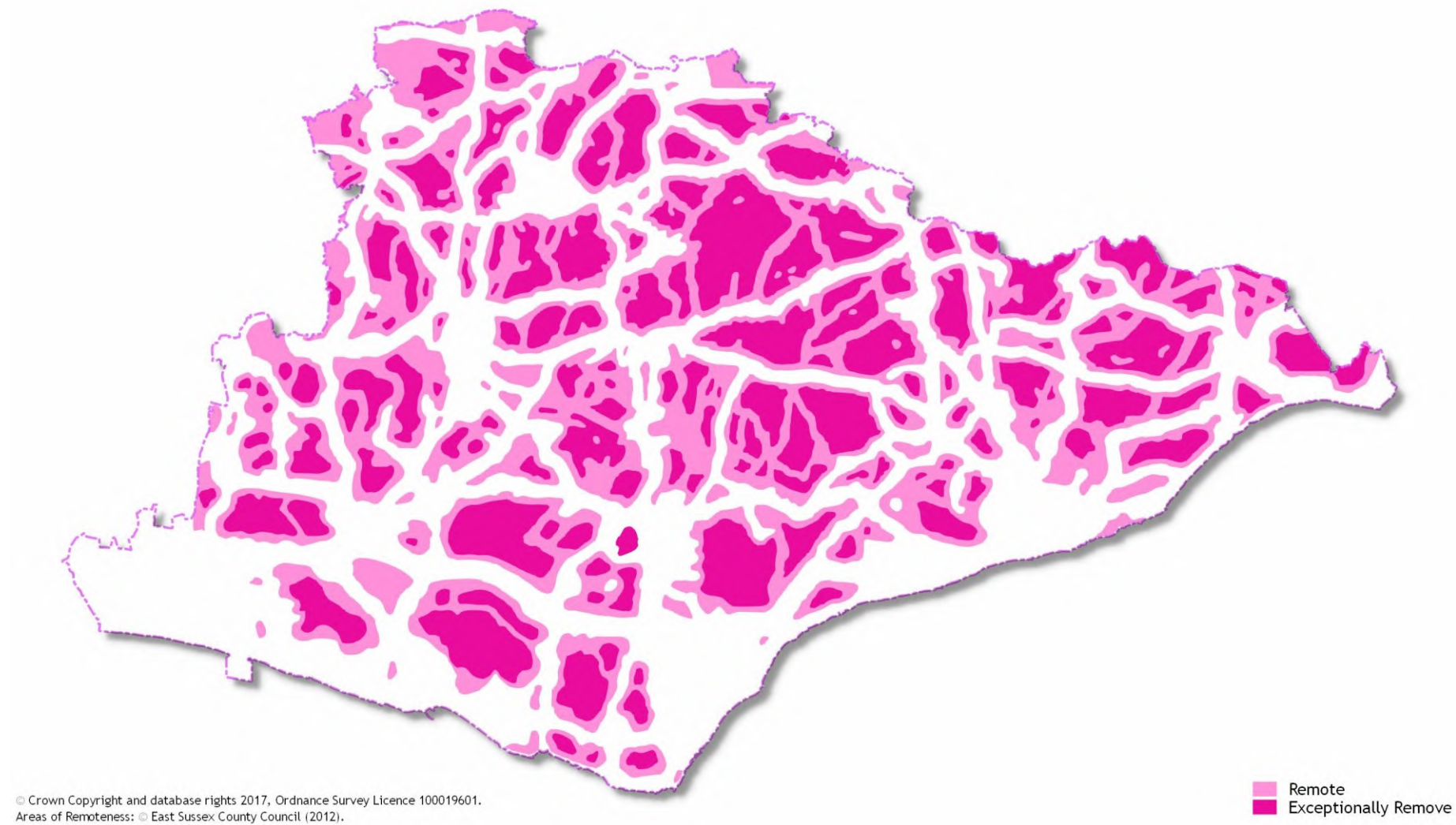
Map 2 - Index of Multiple Deprivation 2015 (Overall) (Lower Super Output Areas) (2015)



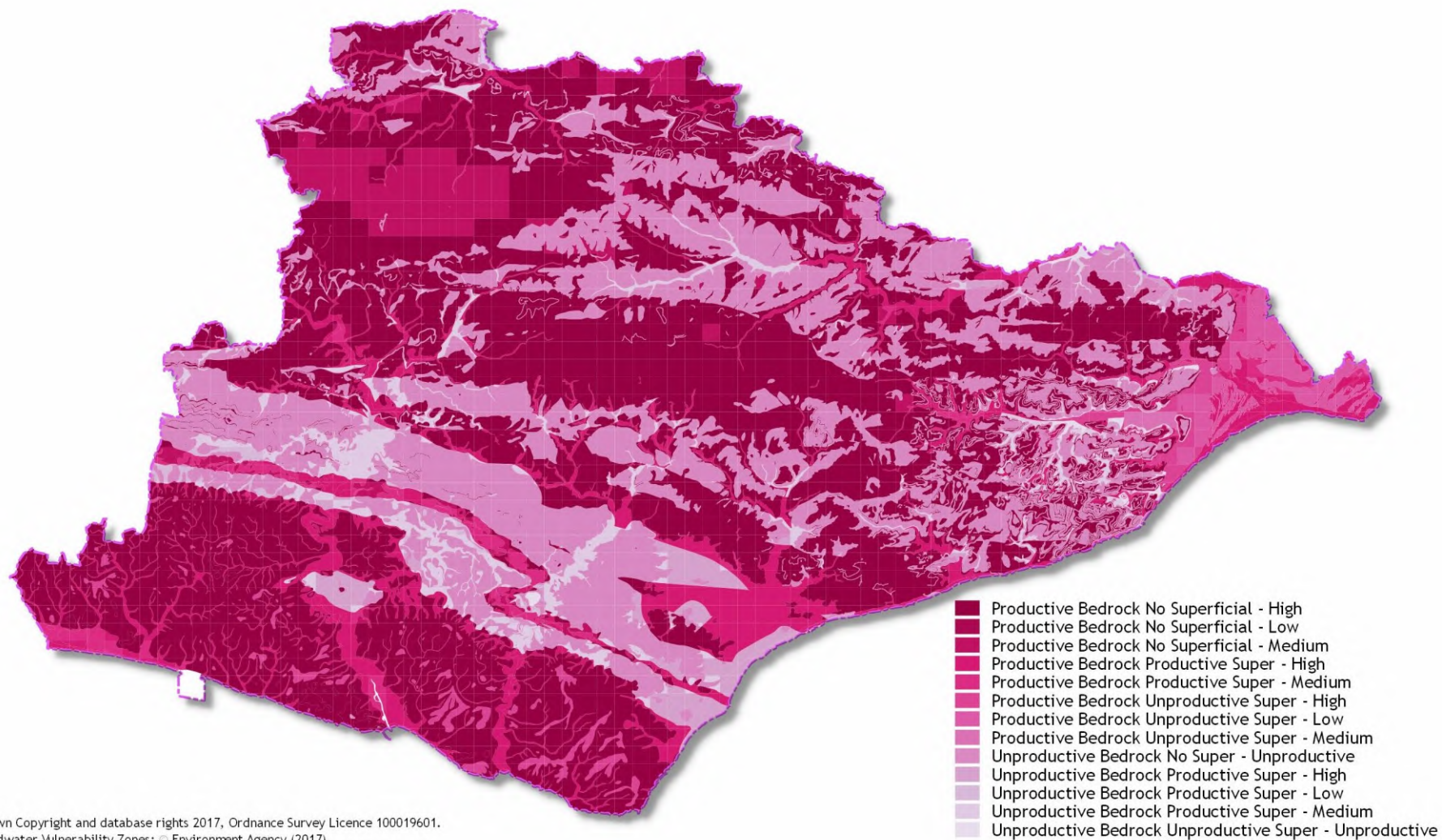
Map 3 - Index of Multiple Deprivation, Health deprivation and disability (Lower Super Output Areas) (2015)



Map 4 - Areas of Remoteness (2012)

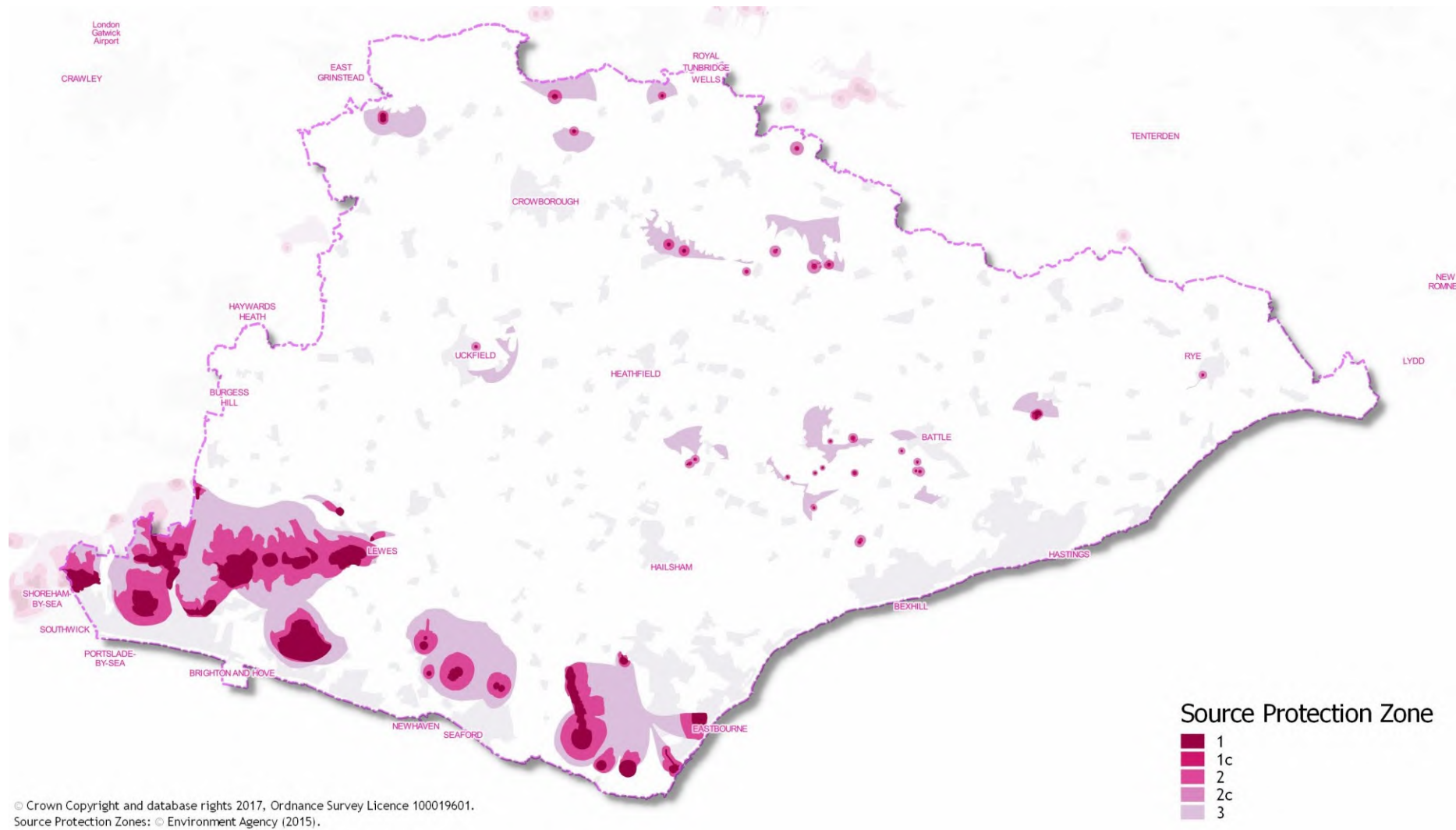


Map 5 - Groundwater Vulnerability Zones (2017)

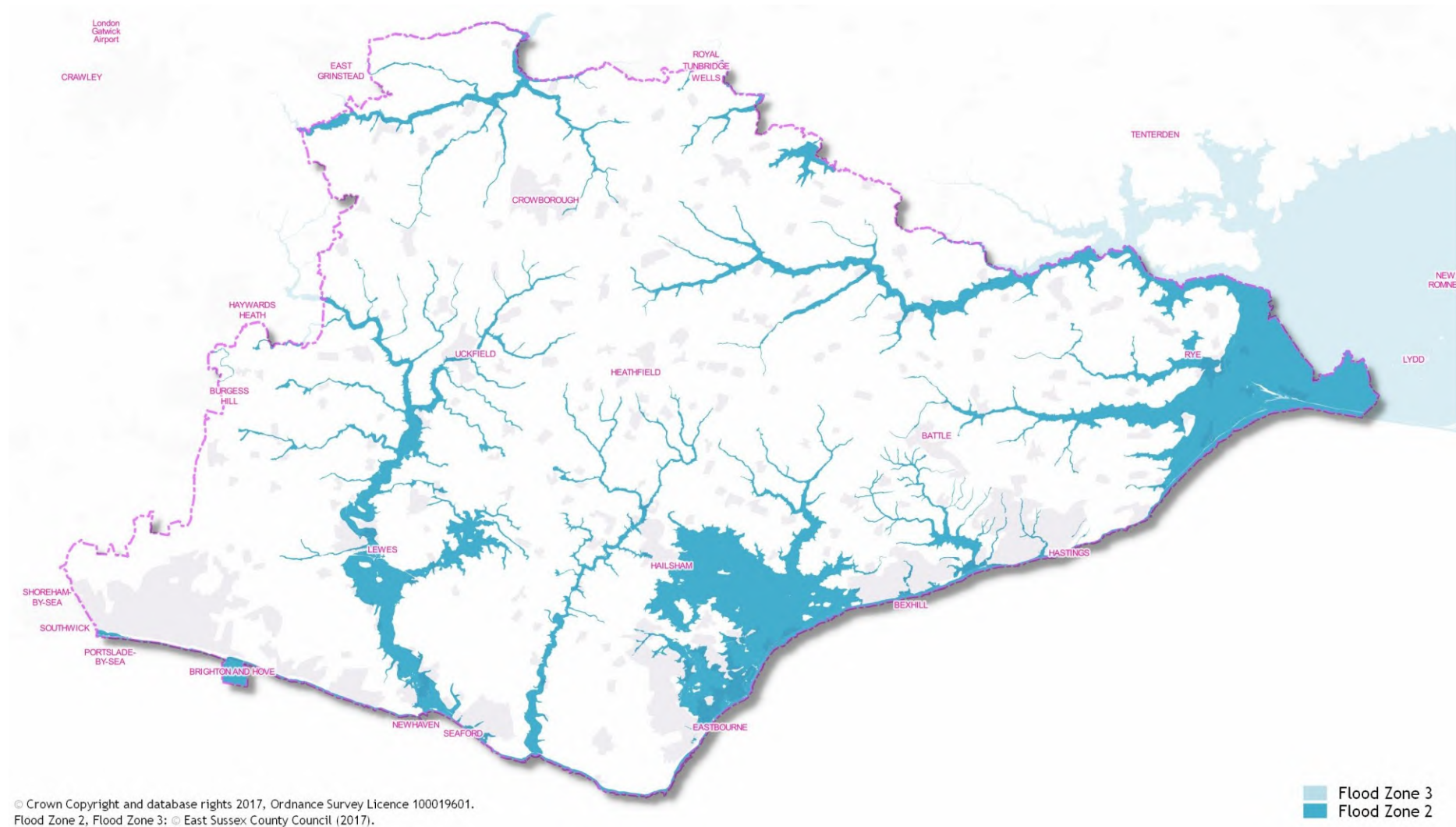


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Groundwater Vulnerability Zones: © Environment Agency (2017).

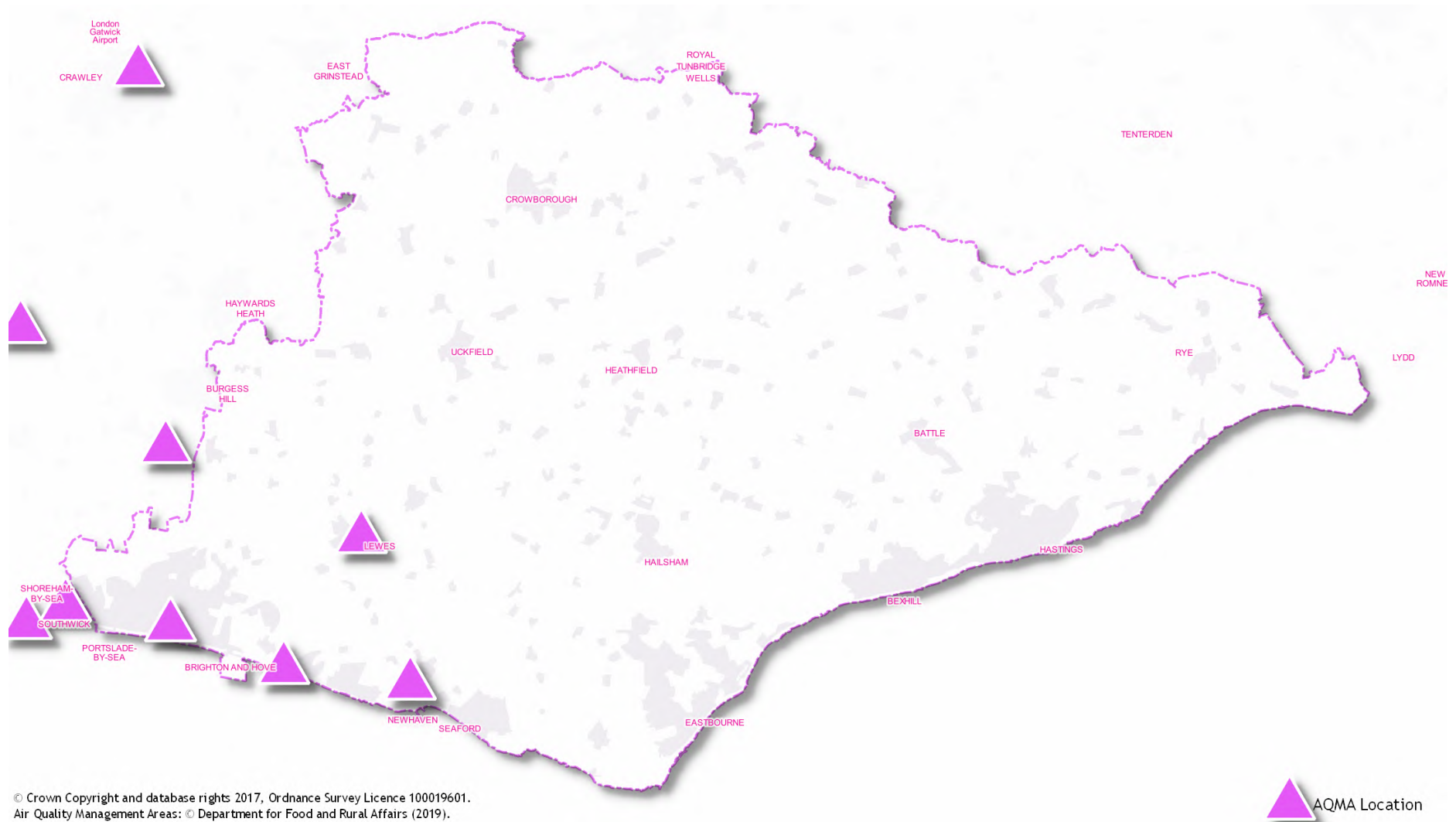
Map 6 - Source Protection Zones (2015)



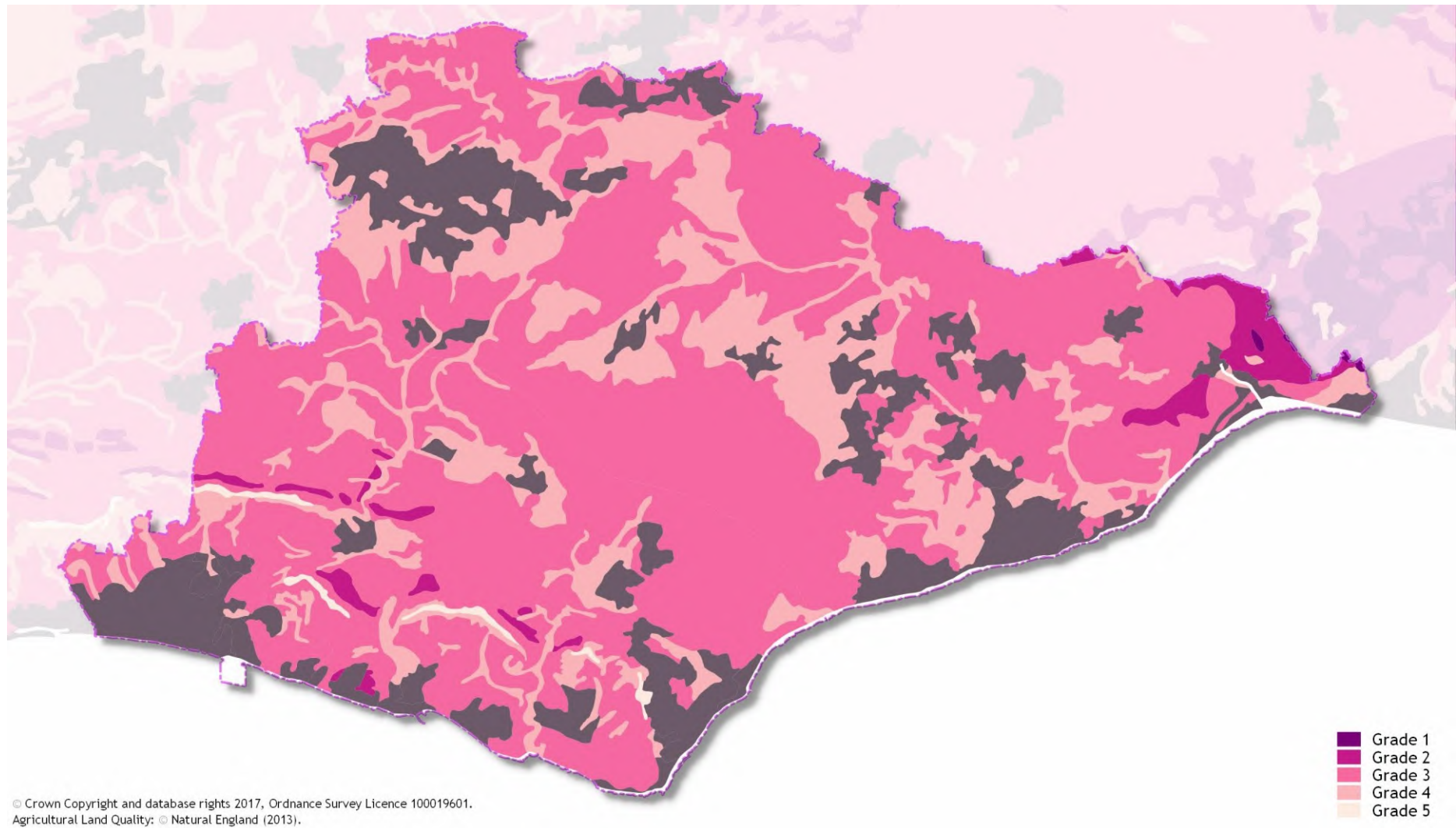
Map 7 - Flood Zone 2, Flood Zone 3 and River Line (SFRA) (2017)



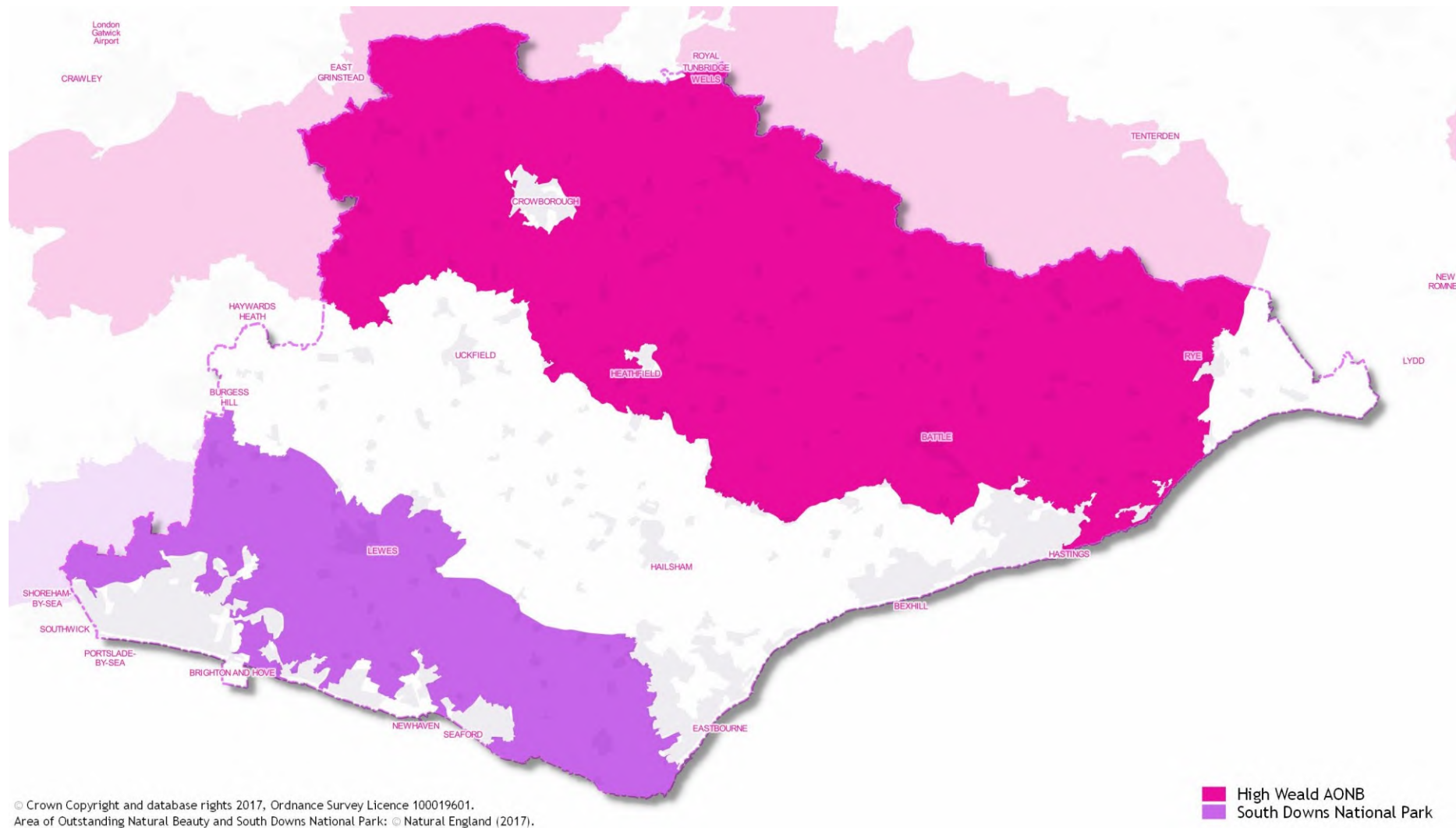
Map 8 - Air Quality Management Areas (2019)



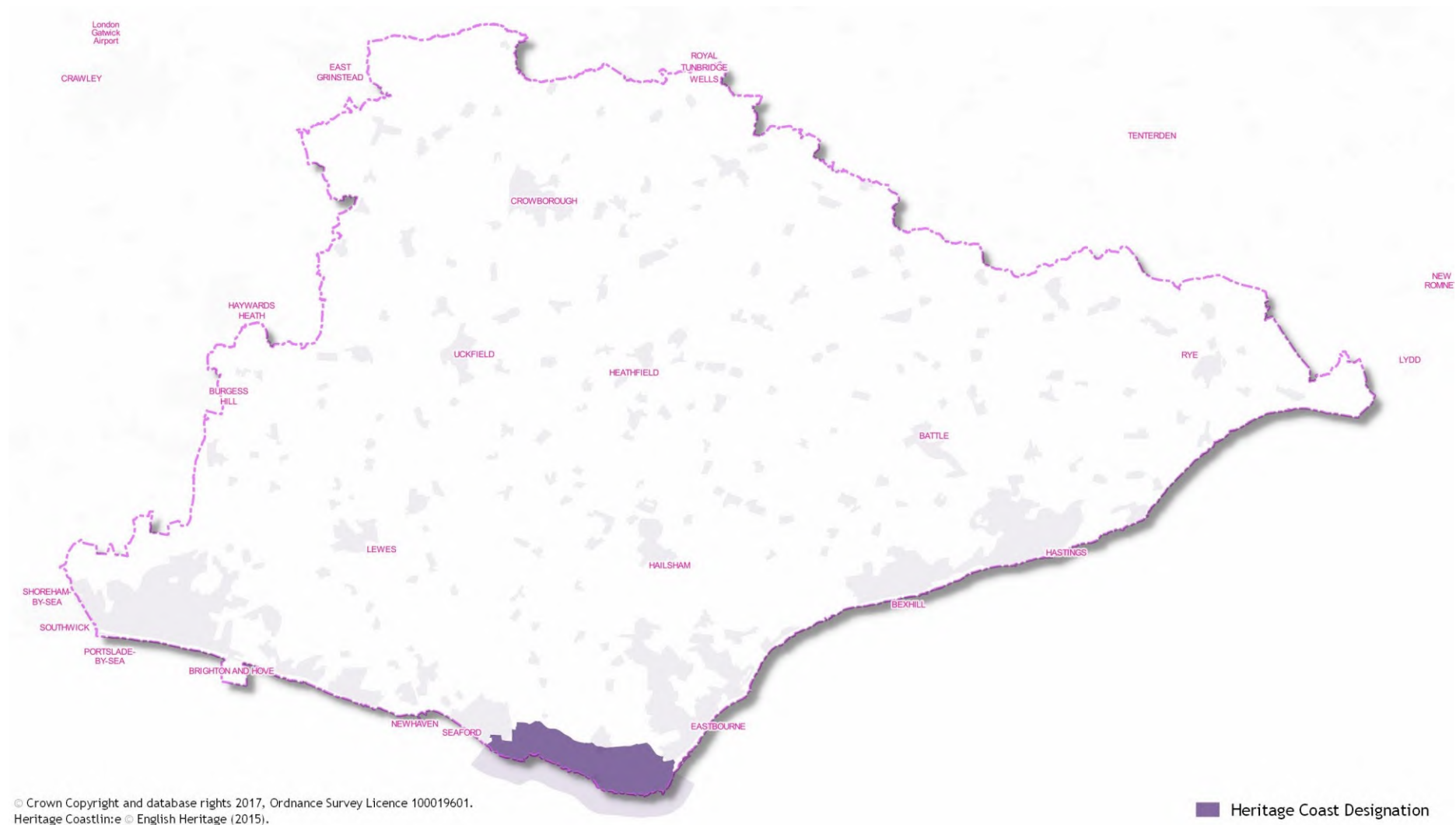
Map 9 - Agricultural Land Quality (2013)



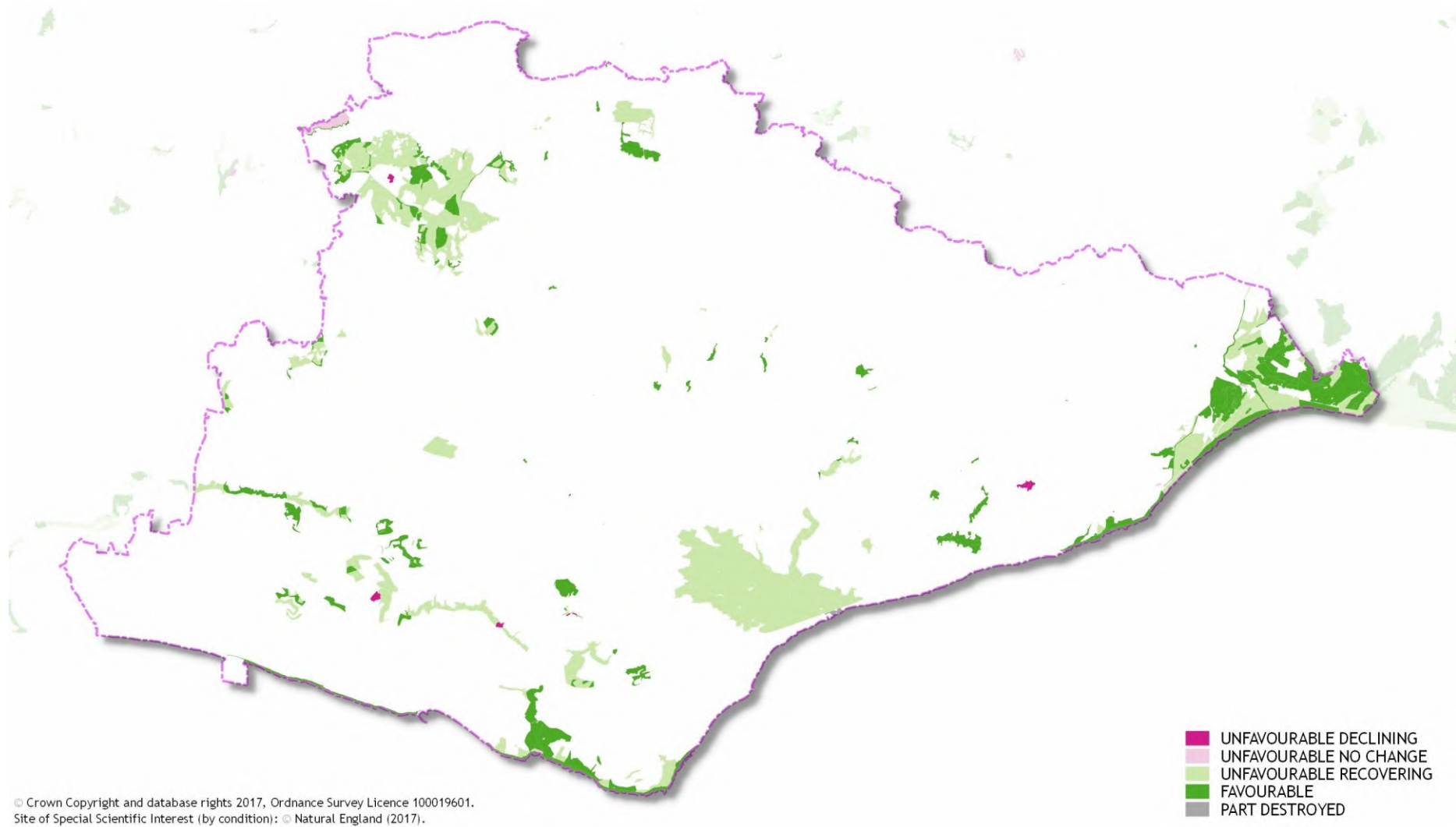
Map 10 - Area of Outstanding Natural Beauty and South Downs National Park (2017)



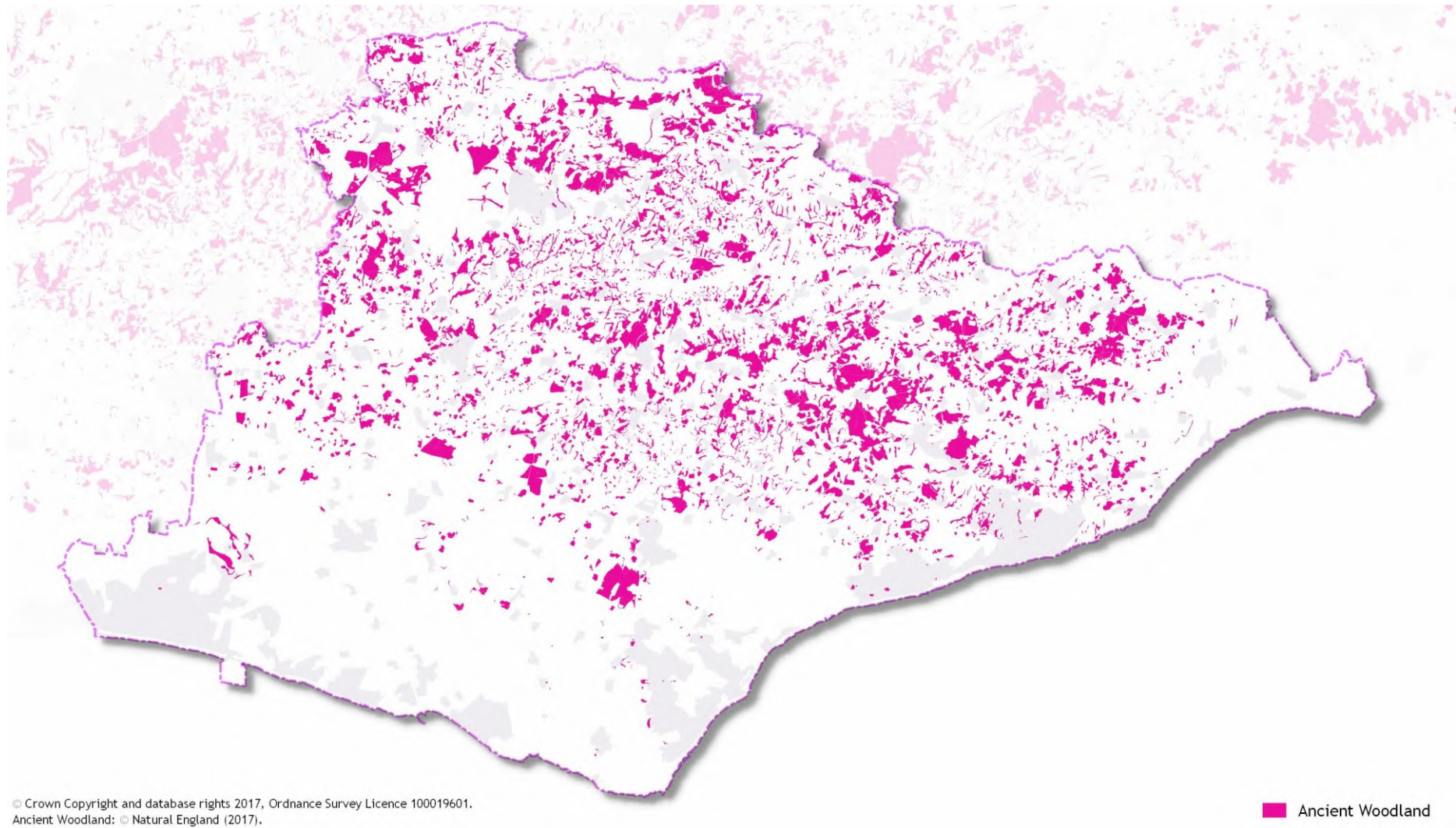
Map 11 - Heritage Coastline (2015)



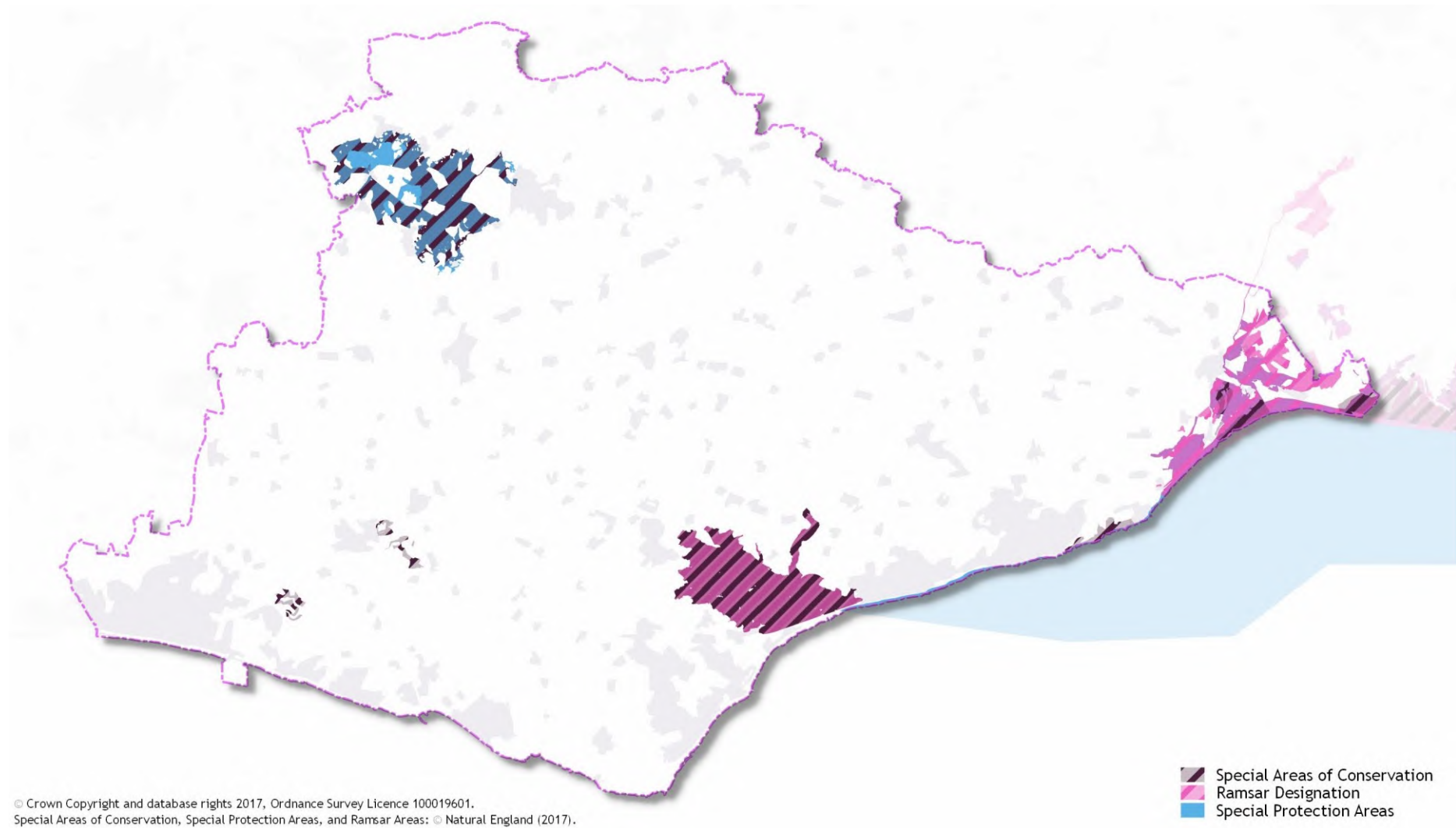
Map 12 - Site of Special Scientific Interest (by condition) (2017)



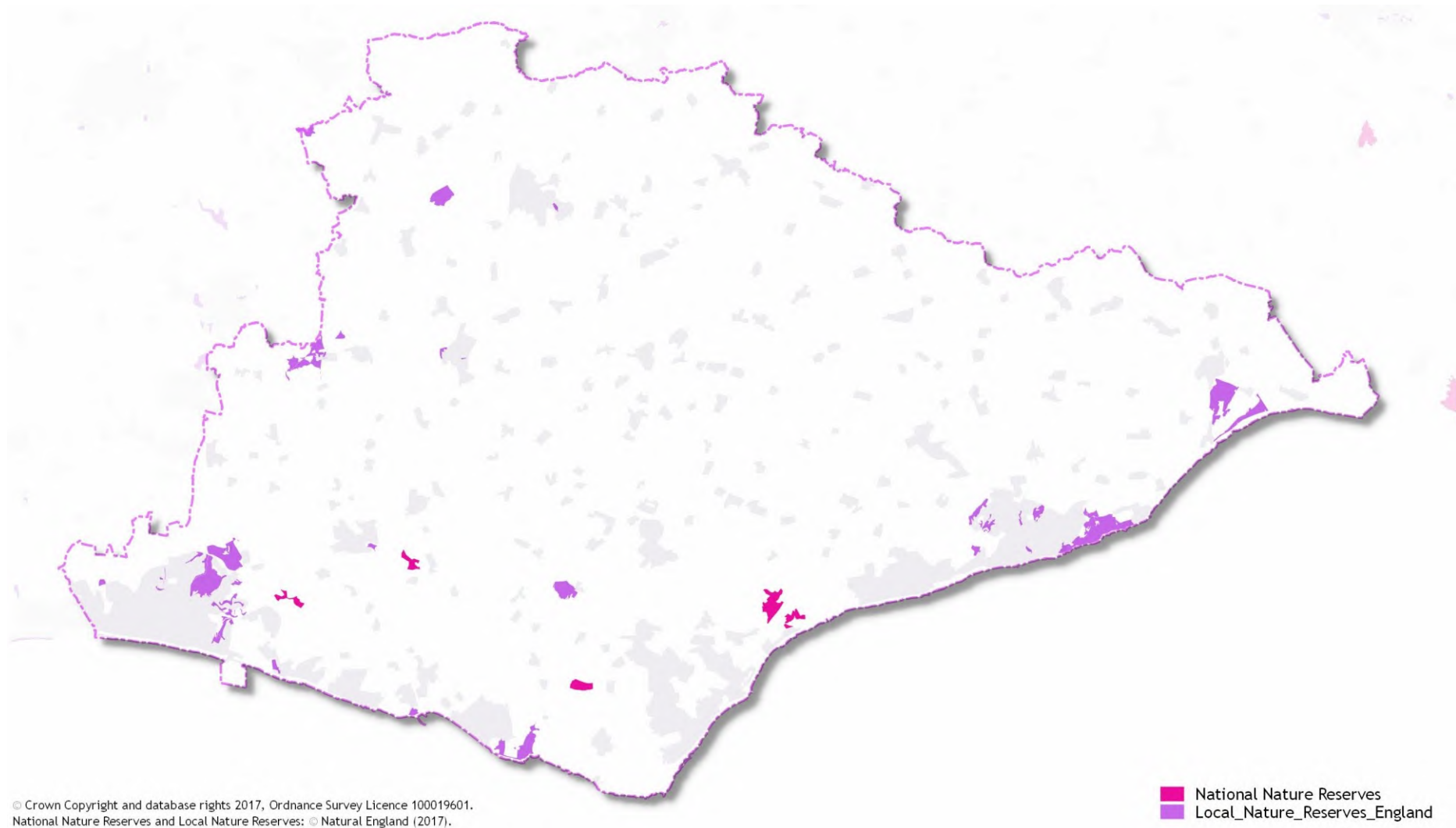
Map 13 - Ancient Woodland (2017)



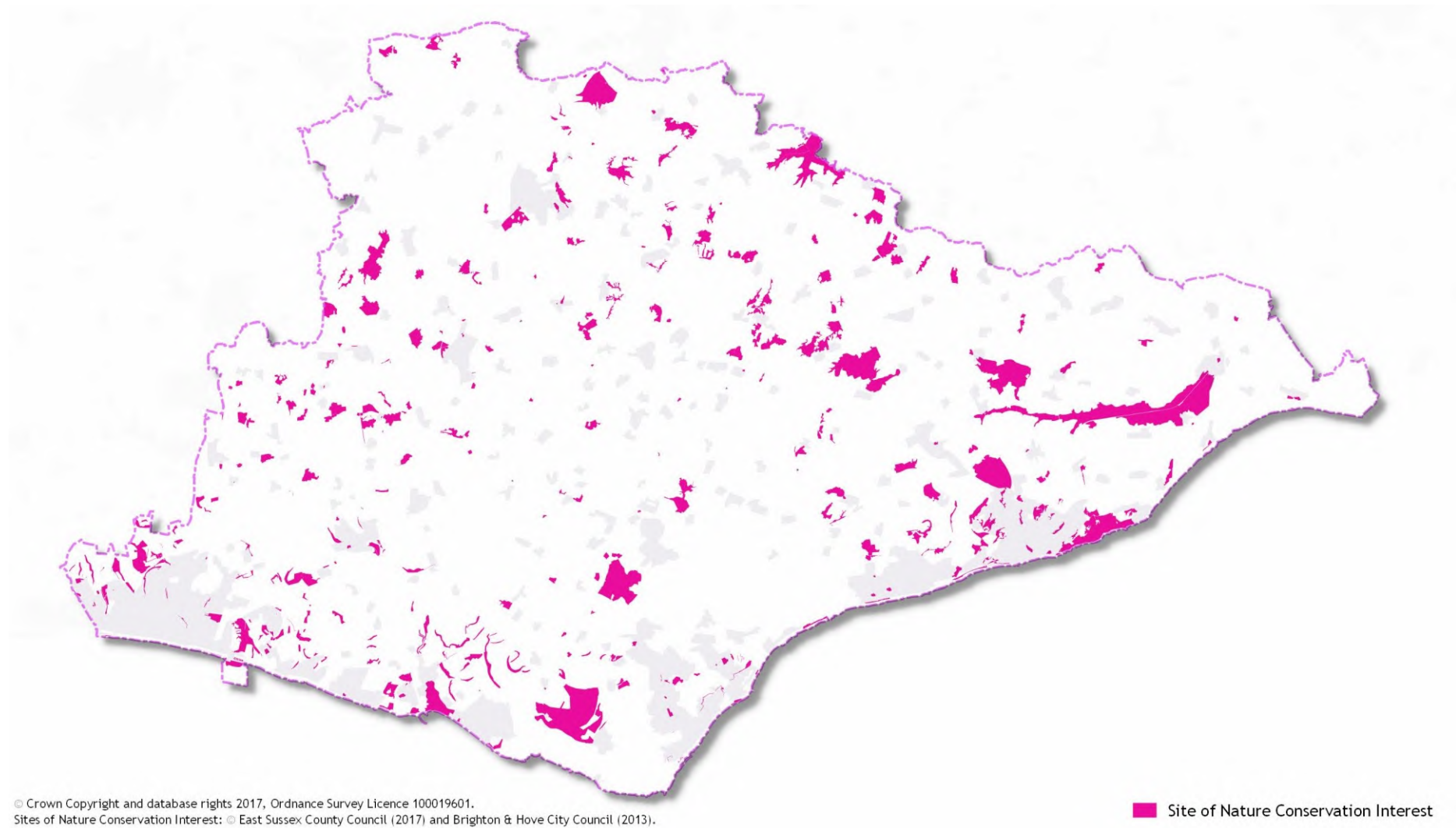
Map 14 - Special Areas of Conservation, Special Protection Areas, and Ramsar Areas (2017)



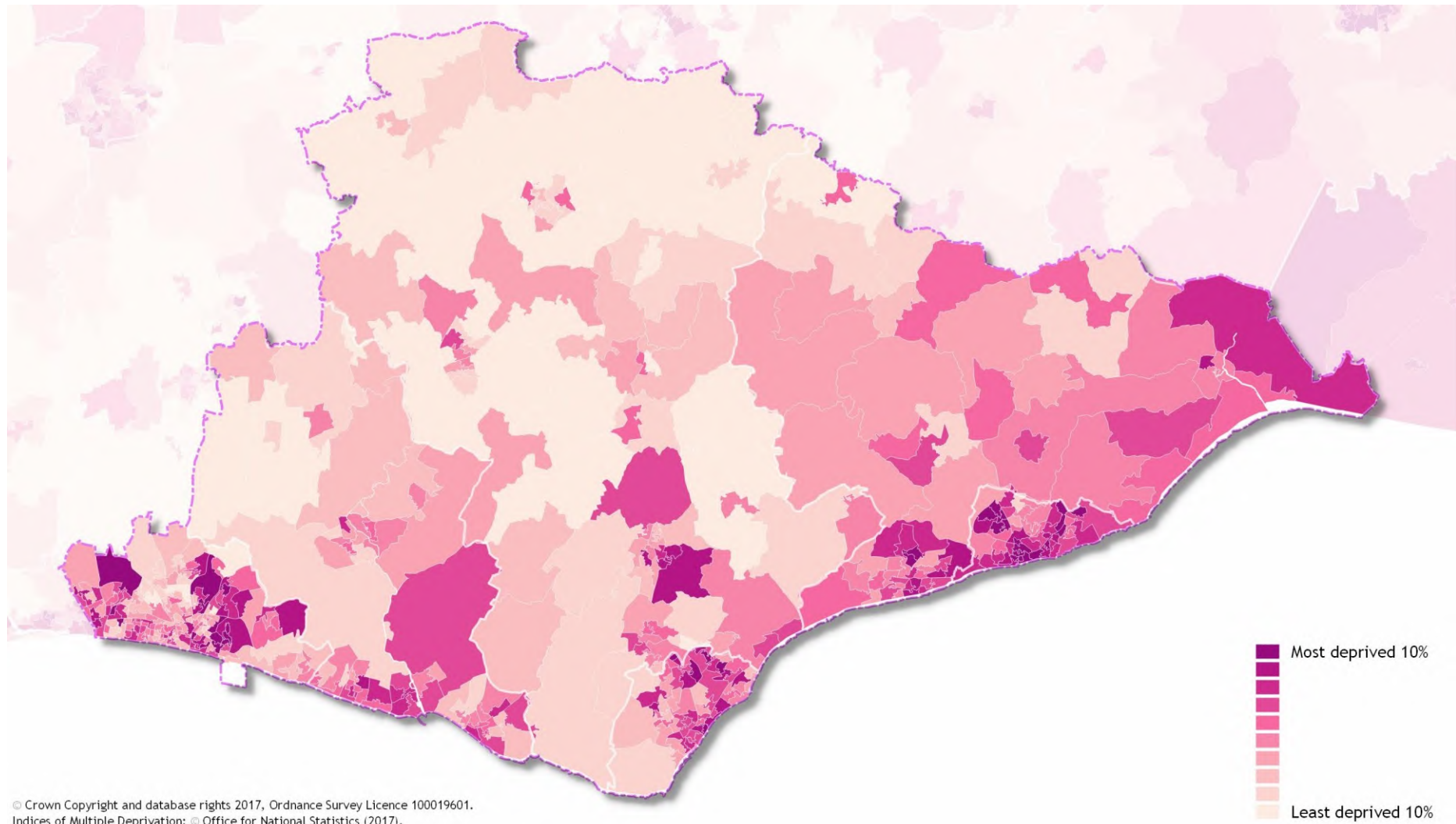
Map 15 - National Nature Reserves and Local Nature Reserves (2017)



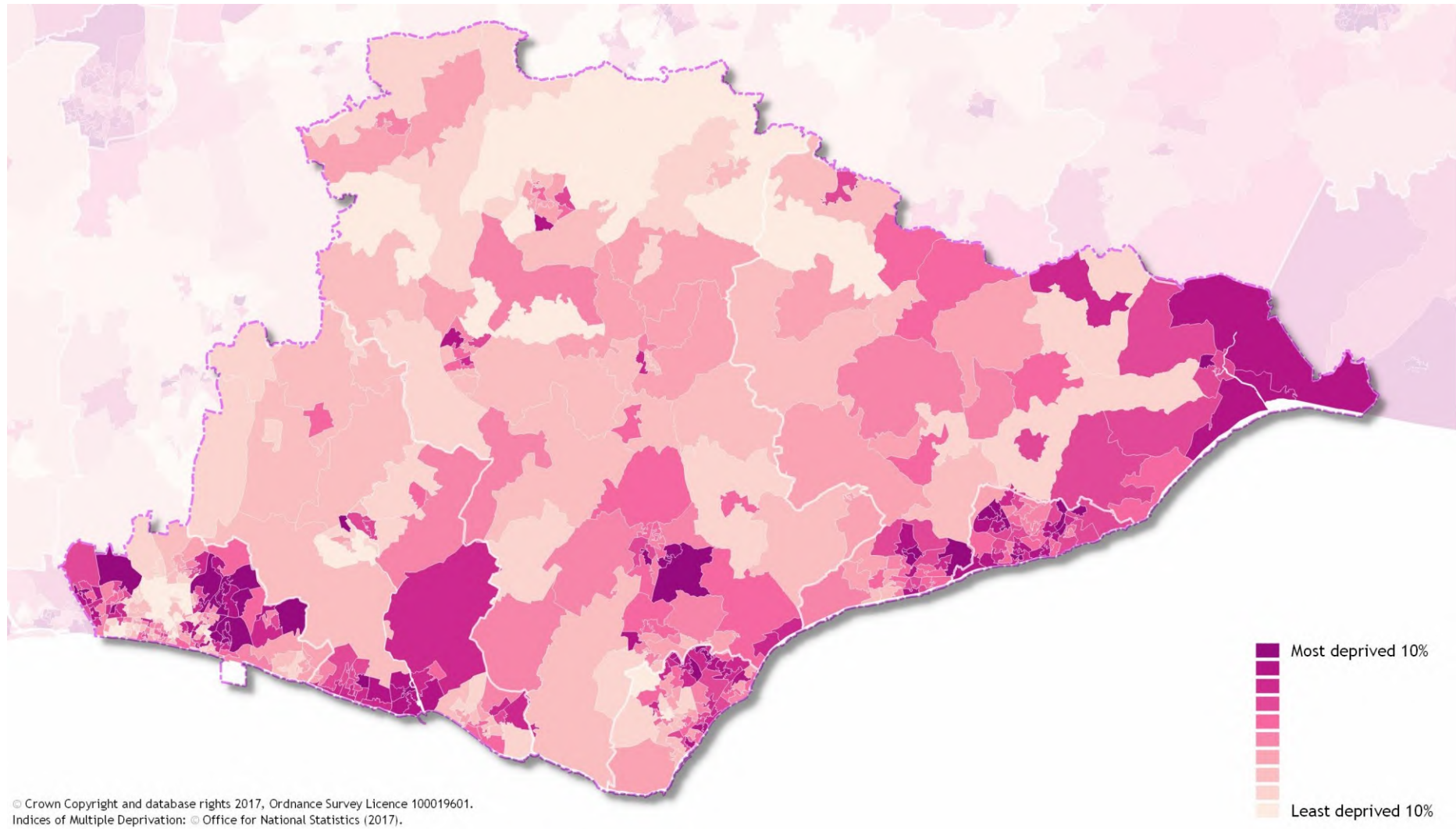
Map 16 - Sites of Nature Conservation Interest (2013/2017 [BH/ES])



Map 17 - Index of Multiple Deprivation, Employment Domain (Lower Super Output Areas) (2015)



Map 18 - Index of Multiple Deprivation, Education, skills and training Domain (Lower Super Output Areas) (2015)



Annex D: Appraisal of Sites

R-S1-001: Aldershaw Handmade Tiles Ltd

1. To Avoid negative effects and enhance positive effects on health.	N/A	
2. To protect the amenity of residents and neighbouring land uses.	•	The effect on amenity as a consequence of traffic movements will be unchanged from present. The nearest residence is over 800m from the site, direct effects on residential amenity as a result of extraction are considered unlikely. Restoration of the site is unlikely to involve community benefit owing to its size.
3. To improve equality and access to sustainable waste management.	N/A	
4. To minimise waste generation and disposal to land.	N/A	
5. To ensure the sustainable use of local mineral resources.	++	The extraction of clay at this site would enable the continued extraction of a specialist material at the quarry. This extraction would positively contribute to the sustainable use of minerals.
6. To maintain and improve water quality.	N/A	
7. To seek the protection of and sustainable use of water resources.	N/A	
8. To reduce risk and impact of flooding.	N/A	
9. To limit the causes of and adapt to climate change.	+/-	The continued production of minerals at this location will allow for continued local provision of clay, which will reduce distance of travel and associated emissions.
10. To protect air quality and reduce air pollution.	•	There are no AQMA designations near the site and allocation of this site would not increase the limited number of existing vehicle movements.
11. To reduce adverse impacts of transporting waste and	+	Allocation of the site would enable continued local production of clay serving the local area. The site is served by existing tile making facility on site.

minerals on the environment.		
12. To conserve and enhance important soil functions and types.	•	The site is classified as non-agricultural.
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	•/?	<p>The site is within the High Weald AONB. Impact is likely to be minimal owing to the small levels of extraction. In relation to undesignated historic assets, there has been no recorded archaeological investigation of this site, but its geological and topographical location (identical to the nearby SM Roman iron working settlement) means that it has a high potential of containing remains, including remains of national significance. Historic mapping records agricultural sites and former sea defence earthworks. A <u>fieldwork assessment</u> should be undertaken to assess potential impact on archaeology and appropriate mitigation. A restoration scheme was not submitted with the original proposal. The potential enhancement to the countryside is unknown.</p> <p>Recommended mitigation: <u>Archaeological Field Assessment</u>.</p>
14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	--	<p>Ancient woodland covers the proposed extraction areas. However, proposed extraction is very small scale. There are local records of protected and notable species including dormouse, great crested newt and bluebell. An <u>ecological survey</u> should be undertaken to establish if protected species are present in and around the extraction area. A restoration scheme was not submitted with the original proposal. However, the limited extraction limits the benefits that could be achieved. A <u>restoration scheme</u> that seeks to maximise the environmental and nature conservation benefits should be required.</p> <p>Recommended mitigation: <u>Ecological Survey</u>, <u>Restoration Scheme</u>.</p>
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	N/A	
16. To contribute to the growth of a sustainable and diversified economy	+	Allocation of site would enable continued extraction to provide clay for use in construction.
17. To provide employment opportunities and develop and maintain a skilled workforce.	+	Allocation of site would support the existing jobs at Aldershaw Tiles.

R-S1-005: Lydd Quarry

1. To Avoid negative effects and enhance positive effects	N/A	
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on health.		
2. To protect the amenity of residents and neighbouring land uses.	-/+	The effect on amenity as a consequence of traffic movements will either be unchanged from present or may improve from the short term owing to a reduction of supply from the site as a consequence of the development of the aggregate facility in Newhaven. In the short to medium term if extraction were to occur close to the residential properties to the south of the site there may as a result of the potential generation of dust and noise, without mitigation, be a low significance temporary negative effect on the amenity. In the longer term if public access is provided to the restored site there may be indirect health benefits.
3. To improve equality and access to sustainable waste management.	N/A	
4. To minimise waste generation and disposal to land.	N/A	
5. To ensure the sustainable use of local mineral resources.	++	The extraction of aggregates at this site would enable the continuation of extraction at Lydd Quarry. This extraction would positively contribute to the sustainable use of minerals. The continuing production of primary aggregates may discourage the use of secondary aggregate material. However, it is highly unlikely that secondary aggregates would be able to meet the demand for aggregates within the Plan. Allocation of this site would support the continued operation of Lydd Quarry which is located in Kent. This is broadly supported by the Kent Minerals and Waste Local Plan (2016).
6. To maintain and improve water quality.	N/A	
7. To seek the protection of and sustainable use of water resources.	N/A	
8. To reduce risk and impact of flooding.	•	The proposed development is considered water compatible.
9. To limit the causes of and adapt to climate change.	+/-	The continued production of minerals at this location will allow for continued local provision of aggregates. Non-allocation is likely to result in aggregate being transported over a longer distance. However, the continuing production of primary aggregates may discourage the use of secondary aggregate material.
10. To protect air quality and reduce air pollution.	-	Dust generated as a result of minerals extraction may affect local air quality. A <u>stand-off distance</u> between extraction and sensitive neighbouring uses could potentially mitigate this issue. There are no AQMA designations near the site and allocation of this site would not increase the limited number of

		existing vehicle movements. Recommended mitigation: <u>Stand-off Distance</u> .
11. To reduce adverse impacts of transporting waste and minerals on the environment.	+	Allocation of the site would enable continued local production of aggregate serving the local area. The site is served by existing sorting and processing plant on site.
12. To conserve and enhance important soil functions and types.	•	The site is classified as either Grade 4 land.
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	?	There is a deserted medieval village located at Lydd, at the southern end of field 2 And 3. The medieval village incorporates the sewage treatment works. A <u>fieldwork assessment</u> would need to take place prior to the site being disturbed. The outcome of the assessment would determine if development in this area was possible and any mitigation required. It is proposed that the site be restored to water bodies. The existing site is well screened and the proposed working area will be low lying. If unmitigated development presents an unacceptable temporary effect on the local landscape, potential mitigation could include <u>landscaped bunds</u> Recommended mitigation: <u>Archaeological Field Assessment</u> , <u>Landscaped Bunds</u> .
14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	---	Site adjacent to Dungeness, Romney Marsh & Rye Bay SAC, SPA and Ramsar site and within the Dungeness, Romney Marsh and Rye Bay SSSI. These are identified for their ecology and geomorphology (see site assessment for details). Potential issues/effects include: air quality; disturbance; groundwater and surface water resources; water quality; loss of supporting habitat; and loss of nationally significant geomorphology. During extraction there may be a temporary negative effect on protected and Biodiversity Action Plan Species, but restoration to wetlands could be positive in the long term. Extraction of minerals within areas designated for geomorphological significance would result in at least partial destruction of the feature. Recommended mitigation: <u>Project Level Mitigation Strategy</u> .
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	N/A	
16. To contribute to the growth of a sustainable and diversified economy	+	Allocation of site would enable continued extraction to provide aggregates for use in construction.
17. To provide employment opportunities and develop and maintain a skilled workforce.	+	Allocation of site would support the existing jobs at Lydd Quarry.

Annex E: Options Appraisal*

Topic A: Provision of Aggregates

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

When considering the options on aggregate supply to the Plan Area it is important to note that that one of the reasons for the Review was the impending exhaustion of permitted mineral reserves at Lydd Quarry. Consequently, this initially presents the two options both of which could be considered to reflect the status quo depending on the position taken. Option A would seek to maintain the status quo through allocation of additional land won mineral reserves. Option B is similar to a 'do nothing' scenario which recognises the time limited nature of the permitted quarry by focusing on using existing recycled and marine aggregate provision alongside road and rail imports.

Change Log

SA Version	Note
Regulation 18 Consultation Draft	<ul style="list-style-type: none"> Initial assessment.
Regulation 19 Consultation Draft	<ul style="list-style-type: none"> Assessment republished unchanged.

Options Assessed

- A: Maintain existing mix through additional land-won site identification. – *Maintain existing mix through additional land-won site identification.*
- B: Recycled and marine aggregate provision with road and rail imports. (No land-won) – *Recycled and marine aggregate provision with road and rail imports. (No land-won)*

Assessment

Objective	A	B	Commentary
1. To Avoid negative effects and enhance positive effects on health.	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> 	Option B may generate more activity and traffic in the Newhaven area, but this would be under existing consents. Both options are likely to produce outcomes similar to the status quo.
2. To protect the amenity of residents and neighbouring land uses.	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> 	Both options result in slightly different patterns of HGV movements. However, as neither option is proposing additional sites in new locations, (option A proposes an extension to existing site,) an increase in movements or change in patterns would be within existing consented levels.
3. To improve equality and access to sustainable waste management.	N/A	N/A	
4. To minimise waste	N/A	N/A	

generation and disposal to land.			
5. To ensure the sustainable use of local mineral resources.	+	-	By not allocating the sites near Lydd Quarry it is likely that these reserves would, in the event that the Quarry ceases operation, be less viable to be worked in the future. Consequently Option B performs slightly worse than Option A in respect of safeguarding resources. Allocation of sand and gravel sites near Lydd Quarry would support the existing Quarry facilities which are located in Kent.
6. To maintain and improve water quality.	N/A	N/A	
7. To seek the protection of and sustainable use of water resources.	N/A	N/A	
8. To reduce risk and impact of flooding.	•	•	
9. To limit the causes of and adapt to climate change.	•	-	It is likely that Option B will result in minerals being transported greater distances than Option A resulting in greater greenhouse gas emissions.
10. To protect air quality and reduce air pollution.	•	-	It is likely that Option B will result in minerals being transported greater distances than Option A resulting in greater air pollution.
11. To reduce adverse impacts of transporting waste and minerals on the environment.	+	- / •	Under Option A, allocation of the Lydd Quarry extension sites would enable the continued provision of local land-won sand and gravel. Option B would likely result in the increased use of Newhaven and Rye wharves as landing points for marine sand and gravel, as well as a greater reliance on imports by road, which may not be considered as local. Option B might appear to result in a modal shift to rail and water, but the final legs of the journey would still be by road, which is a neutral result in terms of modal shift.
12. To conserve and enhance important soil functions and types.	N/A	N/A	
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	?	•	There is a deserted medieval village located at Lydd, at the southern end of field 2 And 3. The significance of this archaeology or what effect quarrying the proposed sites might have is not known at this time. The effect of Option A on this archaeological site is unknown; Option B is unaffected.
14. To protect, conserve	---	N/A	Option A would involve the allocation of sites adjacent to

and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.			Dungeness, Romney Marsh & Rye Bay SAC, SPA and Ramsar site and within the Dungeness, Romney Marsh and Rye Bay SSSI. These areas are identified for their ecology and geomorphology (see site assessment for details). Potential issues/effects include: air quality; disturbance; groundwater and surface water resources; water quality; loss of supporting habitat; and loss of nationally significant geomorphology. Option B would not affect these areas. Under Option A, during extraction there may be a temporary negative effect on protected and Biodiversity Action Plan Species, but restoration to wetlands could be positive in the long term. This would not apply to Option B. Option A would also involve the extraction of minerals within areas designated for geomorphological significance would result in at least partial destruction of the feature; this would not occur under Option B.
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	N/A	N/A	
16. To contribute to the growth of a sustainable and diversified economy	++	++	Both Option A and Option B would ensure the required continued provision of sand and gravel for the lifetime of the Plan.
17. To provide employment opportunities and develop and maintain a skilled workforce.	•	•	Option A would maintain the status quo in relation to employment and maintain existing job, whilst Option B may result in job losses at Lydd Quarry, but this may be balanced by increased employment at the wharves in Rye and Newhaven.

Issue A2: Sustainable Aggregate Use

Following the 2020 consultation on the Draft Revised Policies a further review of the likely aggregate demand (See RM1) was undertaken. As part of that review it was identified that, whilst the Waste and Minerals Local Plan promotes waste minimisation, it is silent on the topic of resource use in general. Aggregates are essential for construction, but they are also a finite resource. This presents a choice of whether or not the Plan should advocate making best use of the aggregates available by seeking to minimise their use.

Change Log

SA Version	Note
Regulation 19 Consultation Draft	• Initial assessment.

Options Assessed

- A: Status Quo – *Status Quo*
- B: Promote minimisation / sustainable use of aggregates – *Promote minimisation / sustainable use of aggregates*

Assessment

Objective	A	B	Commentary
1. To Avoid negative effects and enhance positive effects on health.	N/A	N/A	
2. To protect the amenity of residents and neighbouring land uses.	N/A	N/A	
3. To improve equality and access to sustainable waste management.	N/A	N/A	
4. To minimise waste generation and disposal to land.	•	+	Option B is more likely than option A to reduce the amount of future total waste arisings, by reducing the amount of materials being used.
5. To ensure the sustainable use of local mineral resources.	•	++	Option B is more likely than option A to: make more efficient use of aggregate; promote the use of secondary and recycled aggregate over virgin material.
6. To maintain and improve water quality.	N/A	N/A	
7. To seek the protection of and sustainable use of water resources.	N/A	N/A	
8. To reduce risk and impact of flooding.	N/A	N/A	
9. To limit the causes of and adapt to climate change.	N/A	+	Option B is more likely than option A to promote the minimisation, then use of recycled and secondary aggregate, which in turn will reduce overall energy and resource use. This should provide a positive effect in relation to addressing climate change.
10. To protect air quality and reduce air pollution.	N/A	N/A	
11. To reduce adverse impacts of transporting waste and minerals on the environment.	•	+	By seeking to minimise and make use of secondary and recycled material option B should extend the life of local mineral resources and encourage use of recycled and secondary sources which tend to be local to the county. Option A would retain the status quo.

12. To conserve and enhance important soil functions and types.	N/A	N/A	
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	N/A	N/A	
14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	N/A	N/A	
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	N/A	N/A	
16. To contribute to the growth of a sustainable and diversified economy	•	+	By seeking to minimise and promote secondary and recycled aggregate option B, in comparison to option A, should help ensure the continued provision of aggregate required for sustainable economic growth. Option B may also indirectly encourage and support the development of secondary and recycled aggregate businesses by increasing demand for the material.
17. To provide employment opportunities and develop and maintain a skilled workforce.	•	•	

Topic B: Safeguarding Minerals and Minerals Infrastructure

Issue B1: Prior Extraction of Minerals

Change Log

SA Version	Note
Regulation 18 Consultation Draft	• Initial assessment.
Regulation 19 Consultation Draft	• Assessment republished unchanged.

Options Assessed

- A: Status Quo – *Status Quo*
- B: Inclusion of specific prior extraction policy. – *Inclusion of specific prior extraction policy.*

Assessment

Objective	A	B	Commentary
1. To Avoid negative effects and enhance positive effects on health.	N/A	N/A	
2. To protect the amenity of residents and neighbouring land uses.	N/A	N/A	
3. To improve equality and access to sustainable waste management.	N/A	N/A	
4. To minimise waste generation and disposal to land.	N/A	N/A	
5. To ensure the sustainable use of local mineral resources.	•	+	As specific policy as proposed under Option B will ensure that all safeguarded minerals are not sterilised by development unless it cannot be extracted practically or feasibly. Whilst this should also be the case under Option A, making the requirements explicit, instead of relying on the NPPF, is more likely to draw developers' attention to the requirement.
6. To maintain and improve water quality.	N/A	N/A	
7. To seek the protection of and sustainable use of water resources.	N/A	N/A	
8. To reduce risk and impact of flooding.	N/A	N/A	
9. To limit the causes of and adapt to climate change.	N/A	N/A	
10. To protect air quality and reduce air pollution.	N/A	N/A	
11. To reduce adverse impacts of transporting waste and minerals on the environment.	•	+	Option B is more likely than Option A to actively promotion of prior extraction will support local minerals provision.

12. To conserve and enhance important soil functions and types.	N/A	N/A	
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	N/A	N/A	
14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	N/A	N/A	
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	N/A	N/A	
16. To contribute to the growth of a sustainable and diversified economy	N/A	N/A	
17. To provide employment opportunities and develop and maintain a skilled workforce.	N/A	N/A	

Issue B2: Safeguarding Minerals Infrastructure

Two options have been proposed, one of which, Option B, seeks to extend the area of minerals infrastructure being safeguarded. The selection of these areas is based on national policy which indicates that locally and nationally significant reserves should be safeguarded. The identification of the boundaries for these areas is a matter of technical judgment and is, therefore, not addressed within this SA.

Options Assessed

- A: Status Quo – *Status Quo*
- B: Strengthening policy through reference to the Agent of Change principle and existing safeguarding to cover East Quay – *Strengthening policy through reference to the Agent of Change principle and existing safeguarding to cover East Quay*

Assessment

Objective	A	B	Commentary
1. To Avoid negative effects and enhance positive effects on health.	N/A	N/A	

2. To protect the amenity of residents and neighbouring land uses.	•	+	In comparison to Option A, Option B is more likely to manage expectations through the introduction of the Agent of Change principle. It is also likely to help in respect to the expected perceived amenity of future occupiers of adjoining developments. The extension of the safeguarded area should also assist in preventing incomparable development.
3. To improve equality and access to sustainable waste management.	N/A	N/A	
4. To minimise waste generation and disposal to land.	N/A	N/A	
5. To ensure the sustainable use of local mineral resources.	•	+	Option A as the status quo is assessed to be neutral. Option B is likely to result in increased safeguarding as a result of the Agent of Change principle which will help protect areas that are or may be required in the handling of minerals. It should increase the overall level of protection that safeguarded sites receive. Increased safeguarding should also indirectly support neighbouring MLPs by providing increased certainty as to future available railhead and wharf capacity.
6. To maintain and improve water quality.	N/A	N/A	
7. To seek the protection of and sustainable use of water resources.	N/A	N/A	
8. To reduce risk and impact of flooding.	N/A	N/A	
9. To limit the causes of and adapt to climate change.	N/A	N/A	
10. To protect air quality and reduce air pollution.	N/A	N/A	
11. To reduce adverse impacts of transporting waste and minerals on the environment.	N/A	N/A	
12. To conserve and enhance important soil	N/A	N/A	

functions and types.			
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	N/A	N/A	
14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	N/A	N/A	
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	N/A	N/A	
16. To contribute to the growth of a sustainable and diversified economy	N/A	N/A	
17. To provide employment opportunities and develop and maintain a skilled workforce.	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

Issue D1: Provision of Specialist Clay

Change Log

SA Version	Note
Regulation 18 Consultation Draft	<ul style="list-style-type: none"> Initial assessment.
Regulation 19 Consultation Draft	<ul style="list-style-type: none"> 'Option C Broad area identification' added.

Options Assessed

- A: Status Quo – *Status Quo*
- B: Allocation of Aldershaw Tiles. – *Allocation of Aldershaw Tiles.*
- C: Broad area identification. – *Broad area identification.*

Assessment

Objective	A	B	C	Commentary
1. To Avoid negative effects and enhance positive effects on health.	N/A	N/A	N/A	
2. To protect the amenity of residents and neighbouring land uses.	•	•	•	Effect on amenity as result of the clay extraction is limited owing to the small scale. Under option A the minimal traffic movements would be displaced to alternative brickworks. Options B and C would retain the status quo.
3. To improve equality and access to sustainable waste management.	N/A	N/A	N/A	
4. To minimise waste generation and disposal to land.	N/A	N/A	N/A	
5. To ensure the sustainable use of local mineral resources.	–	+	+	Option A would likely result in the closure of the brickworks when the existing consented extraction has occurred. Options B and C would enable the extraction of clay at this site to continue. This would positively contribute to the sustainable use of minerals
6. To maintain and improve water quality.	N/A	N/A	N/A	
7. To seek the protection of and sustainable use of water resources.	N/A	N/A	N/A	
8. To reduce risk and impact of flooding.	N/A	N/A	N/A	
9. To limit the causes of and adapt to climate change.	•	+	+	Under option B and C the continued production of minerals at this location will allow for continued local provision of clay, which will reduce distance of travel and associated emissions. This would not occur under option A.
10. To protect air quality	N/A	N/A	N/A	

and reduce air pollution.				
11. To reduce adverse impacts of transporting waste and minerals on the environment.	-	+	+	Options B and C would enable continued local production of clay serving the local area. They would also continue to support the existing tile making facility on site. Option A would not offer these benefits.
12. To conserve and enhance important soil functions and types.	N/A	N/A	N/A	
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	•	?	?	Without mitigation (as set out in the site assessment) option B may have a unknown effect on the preservation of undesignated historic assets. The effect on the preservation of undesignated historic assets from option C is unknown owing to the lack of a specific location to assess. This would need to be addressed as part of any proposal. Option A would have no effect.
14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	•	-	?	Option A would have no effect on the on-site ancient woodland whilst Option B is likely to have a negative effect as a consequence of the loss of ancient woodland. The effect on ancient woodland under option C is uncertain, but it is less likely than option B to affect it. Protected species may also be located on or near the site, which without mitigation (as set out in the site assessment) may be negatively affected under Option B. The effect on protected species under option C is uncertain, but any effect is likely to be less than option B with appropriate site selection. No effect is anticipated under Option A.
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	N/A	N/A	N/A	
16. To contribute to the growth of a sustainable and diversified economy	-	+	+	Option A would result in the eventual closure of the Brickworks, whilst options B and C would enable continued extraction to provide clay for use in construction.
17. To provide employment opportunities and develop and maintain a skilled workforce.	-	+	+	Option A would, in the long term, not support the existing jobs at Aldershaw Tiles, whereas Options B and C are more likely to do so.

Annex F: Compatibility Check of Strategic Objectives

Government guidance recommends that the SA should undertake compatibility analysis between the objectives of the Plan and the SA appraisal objectives. The purpose of this exercise is to determine whether the objectives of the Plan will contribute to sustainable development, and to identify any potential incompatibilities between the objectives of the Plan and sustainable development policy objectives.

The Strategic Objects of the Waste and Minerals Local Plan (WMLP) are set out on Pages 23 and 24 of the Waste and Minerals Plan (WMP). These are listed in the table below. A compatibility check between the strategic objectives and the objectives of the SA was carried out during the preparation of the WMP and WMSP. As neither set of objectives has changed this section has not been revised. The compatibility check table shown below is a reproduction of Table 8.3 (page 57) of the Sustainability Appraisal for the Waste and Minerals Sites Plan.

In most cases where there is a link between the WMLP Strategic Objective and the SA Objective, they are mutually compatible, although in some instances there is a degree of uncertainty and these are shown by a '?' in the table.

Waste and Minerals Local Plan Strategic Objectives

SO1	To achieve declining rates of growth of all wastes, to reduce the amount of waste produced, and to drive the management of waste up the hierarchy by reusing and recycling waste material into new products and recovering energy from materials that cannot effectively be recycled.
SO2	To achieve prudent and efficient use of minerals, having regard to the market demand and supply restrictions in the Plan Area, and to recognise waste as a resource in order to reduce local demands on water, energy, land, and primary raw materials including soil and minerals.
SO3	To make timely provision for sufficient facilities for the sustainable management of waste (including waste water) and production of minerals to meet forecast requirements for the Plan Area, in order to contribute as far as practicable to regional and national requirements for waste management and support the production of nationally and regionally important minerals.
SO4	To protect and enhance the environment, communities and human health through minimising harmful emissions to air (including greenhouse gases), water and land; minimising the use of natural resources (including greenfield sites); minimising impacts on protected habitats, designated landscapes, geological sites and heritage sites; and areas which have landscape character and quality which is sensitive to development including the South Downs National Park; and through ensuring high quality mitigation, compensation and restoration to appropriate after-uses. Account will be taken of local landscape character and distinctiveness.
SO5	To manage waste and minerals at an appropriate scale, taking account of the distribution of waste sources and the limitations on the availability of suitable land in the Plan Area, as close to the sources as practicable in order to encourage communities to take more responsibility for the waste they create and to minimise the transport of waste and minerals whilst still moving up the waste hierarchy. Use the most sustainable and practicable mode where it is necessary to transport waste or minerals.
SO6	To ensure that sustainable waste management objectives are considered in all plans, strategies and proposals in the Plan Area, and that the design, construction and operation of all new development promotes sustainable waste management.
SO7	In recognition of limited capacity for disposal to land in the Plan Area, to dispose of waste to land as a last resort and seek appropriate after-use of land disposal sites to achieve conservation and enhancement of the environment.
SO8	To ensure facilities are designed, located and operated in a manner that takes the implications of climate change, and in particular rising sea levels, into account.

	WMLP Strategic Objectives							
SA Objectives	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8
1. To Avoid negative effects and enhance 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.	✓		✓		✓	✓	✓	
5. To ensure the sustainable use of local mineral resources.	✓	✓	✓		✓			
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 enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.				✓			?	
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	✓	✓	✓	✓	✓			✓
16. To contribute to the growth of a sustainable and diversified economy	✓	✓	✓					
17. To provide employment opportunities and develop and maintain a skilled workforce.	✓	✓	✓					

Annex G: Policy Appraisal*

This section contains the policies appraisals undertaken for the draft policies contained within the Revised Policies Document. Where a policy has been assessed to be *de minimis*

RV1: Minerals and Waste Development affecting the South Downs National Park and High Weald Area of Outstanding Natural Beauty

The proposed alterations add reference to the High Weald AONB. This is currently addressed under WMP27, but the move will make the existing requirements more explicitly. It is considered that this does not significantly change the direction of policy and consequently are assessed to be *de minimis*.

Change Log

SA Version	Note
Regulation 18 Consultation Draft	<ul style="list-style-type: none"> Initial assessment.
Regulation 19 Consultation Draft	<ul style="list-style-type: none"> Assessment republished unchanged.

RW1: Sustainable Locations for Waste Development

The proposed alterations are considered to not significantly change the direction of policy and consequently are assessed to be *de minimis*.

Change Log

SA Version	Note
Regulation 18 Consultation Draft	<ul style="list-style-type: none"> Initial assessment.
Regulation 19 Consultation Draft	<ul style="list-style-type: none"> Assessment republished unchanged.

RM0: Sustainable use of aggregates

Policy RM0 promotes the sustainable use of aggregates and support for district and borough councils promoting such policies within their local plans.

Change Log

SA Version	Note
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Regulation 19 Consultation Draft	<ul style="list-style-type: none"> Initial assessment.
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Assessment

Objectives	Short	Medium	Long	Comments	Prob	Dir/Ind	Rev?
1. To Avoid negative effects and enhance positive effects on health.	N/A	N/A	N/A	No impacts identified.			
2. To protect the amenity of residents and neighbouring land uses.	N/A	N/A	N/A	No impacts identified.			
3. To improve equality and access to sustainable waste management.	N/A	N/A	N/A	No impacts identified.			
4. To minimise waste generation and disposal to land.	+	+	+	By reducing the amount of materials being used, the policy should contribute to reducing the amount of future total waste arisings.	H	I	X
5. To ensure the sustainable use of local mineral resources.	+	+	+	The policy should make more efficient use of aggregate and promote the use of secondary and recycled aggregate over virgin material.	H	I	X
6. To maintain and improve water quality.	N/A	N/A	N/A	No impacts identified.			
7. To seek the protection of and sustainable use of water resources.	N/A	N/A	N/A	No impacts identified.			
8. To reduce risk and impact of flooding.	N/A	N/A	N/A	No impacts identified.			
9. To limit the causes of and adapt to climate change.	+	+	+	The Policy promotes minimisation, and then use of recycled and secondary aggregate. This should reduce overall energy and resource use used in production and transport etc., which should provide a positive effect in relation to	H	I	X

				addressing climate change.			
10. To protect air quality and reduce air pollution.	N/A	N/A	N/A	No impacts identified.			
11. To reduce adverse impacts of transporting waste and minerals on the environment.	+	+	+	By seeking to minimise and make use of secondary and recycled material the policy should help extend the life of local mineral resources and encourage use of recycled and secondary sources. Both of which tend to be local to the county, in turn this should reduce the number of HGVs and the distance they travel.	H	D	X
12. To conserve and enhance important soil functions and types.	N/A	N/A	N/A	No impacts identified.			
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	N/A	N/A	N/A	No impacts identified.			
14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	N/A	N/A	N/A	No impacts identified.			
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	N/A	N/A	N/A	No impacts identified.			
16. To contribute to the growth of a sustainable and diversified economy	+	+	+	By seeking to minimise and promote secondary and recycled aggregate the policy should help ensure the continued provision of aggregate required for sustainable economic growth. It may also indirectly encourage and support the development of secondary and recycled aggregate businesses by increasing demand for the material. A reduction in the amount of aggregate used in construction may also affect	H	D	X

				aggregate producers. However, this is likely to be balanced out by an increase in demand for non-aggregate or aggregate replacement products and solutions. Potentially Affected Locations: <u>Plan Area</u> .			
17. To provide employment opportunities and develop and maintain a skilled workforce.	N/A	N/A	N/A	No impacts identified.			

RM1: Provision of Aggregates

Policy RM1 revises Policies WMP11. The revised policy changes the direction of the strategy from the existing strategy which monitoring has indicated is unlikely to be achieved. The assessment below has been undertaken using that at the status-quo.

Change Log

SA Version	Note
Regulation 18 Consultation Draft	<ul style="list-style-type: none"> Initial assessment.
Regulation 19 Consultation Draft	<ul style="list-style-type: none"> Assessment republished unchanged.

Assessment

Objectives	Short	Medium	Long	Comments	Prob	Dir/Ind	Rev?
1. To Avoid negative effects and enhance positive effects on health.	+	+	+	The provision of minerals indirectly improves human health by enabling the continued development of villages, towns and cities. The emphasis on use of existing sites and promotion of sustainable transport modes will concentrate traffic movements around existing facilities. However, these would have been considered when permission was originally granted. Potentially Affected Locations: <u>Urban Areas</u> .	M	I	X
2. To protect the amenity of residents and neighbouring land uses.	+/-	+/-	+/-	The emphasis on use of existing sites and promotion of sustainable transport modes will concentrate traffic moments around existing facilities. This potentially will have a negative impact on the amenity of residents and neighbouring land uses, but will reduce impacts in other areas.	M	D	X

3. To improve equality and access to sustainable waste management.	N/A	N/A	N/A	No impacts identified.			
4. To minimise waste generation and disposal to land.	N/A	N/A	N/A	No impacts identified.			
5. To ensure the sustainable use of local mineral resources.	+	+	+	The Policy in general contributes positively to the sustainable use of minerals. The policy emphasis on promoting secondary and recycled aggregates should help reduce the need for raw minerals. Likewise, it will also help encourage their use. Continued emphasis on existing minerals importation facilities will also indirectly support their safeguarding. Potentially Affected Locations: <u>Minerals Facilities</u> .	H	D	X
6. To maintain and improve water quality.	N/A	N/A	N/A	No impacts identified.			
7. To seek the protection of and sustainable use of water resources.	N/A	N/A	N/A	No impacts identified.			
8. To reduce risk and impact of flooding.	N/A	N/A	N/A	No impacts identified.			
9. To limit the causes of and adapt to climate change.	+	+	+	Policy supports the provision of recycled aggregates facilities, which will reduce the need for raw materials. Potentially Affected Locations: <u>Sand and Gravel Resource</u> .	H	D	X
10. To protect air quality and reduce air pollution.	±/	+/-	±/	The emphasis on use of existing sites and promotion of sustainable transport modes will concentrate traffic moments around existing facilities, which should have suitable accesses to the road network. This is likely to help minimise the effect on areas suffering from air pollution. Likewise, the emphasis on sustainable transport methods may also help. On balance, it is assessed that it is likely to have a minor positive effect. Potentially Affected Locations: <u>Minerals</u>	M	I	X

				<u>Facilities - Areas near, Minerals Facilities - Connecting roads, and areas near connecting roads, Ports & Wharves - Areas near, Ports & Wharves - Connecting roads, and areas near connecting roads, AQMA Designated Areas.</u>			
11. To reduce adverse impacts of transporting waste and minerals on the environment.	$\pm / -$	$\pm / -$	$\pm / -$	Existing facilities will enable the continued import of material into the Plan Area. However, this will be imported material rather than locally sourced. Existing HGV travel patterns are likely to alter as Lydd Quarry reaches the end of its permitted reserves proportionate to its supply. 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). The policy also encourages use of sustainable transport of minerals and indirectly supports safeguarding of existing facilities by enabling development within sites. Potentially Affected Locations: <u>Minerals Facilities (in and near Plan Area) - Connecting roads, and areas near connecting roads.</u>	M	D	X
12. To conserve and enhance important soil functions and types.	N/A	N/A	N/A	No impacts identified.			
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	+	+	+	The emphasis on use of existing sites should reduce the number of required facilities to be provided elsewhere. A broad number of locations across the plan area that could benefit include the High Weald Area of Outstanding Natural Beauty, South Downs National Park, historic environment and its setting including listed buildings etc, and features of local historic or architectural interest. The policy also seeks to used existing and developed land. Potentially Affected Locations: <u>Plan Area.</u>	M	I	X
14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	-	-	-	The Plans seeks to use marine dredged aggregate to in part meet the needs of the Plan Area. Marine dredging may have negative effects on marine biodiversity and marine habitats where it occurs. 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.	M	I	✓

				Potentially Affected Locations: <u>Licensed & Identified Marine Areas for Aggregate Dredging (Outside of Plan Area).</u>			
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	N/A	N/A	N/A	No impacts identified.			
16. To contribute to the growth of a sustainable and diversified economy	++	++	++	The continued provision of minerals will help support the construction of housing and infrastructure. Potentially Affected Locations: <u>Plan Area.</u>	H	D	X
17. To provide employment opportunities and develop and maintain a skilled workforce.	+	+	+	The continued support of existing landing and import facilities, particularly in the Rye and Newhaven areas, has the potential to provide skills in the minerals industry in those areas. Potentially Affected Locations: <u>Port of Newhaven, Port of Rye.</u>	M	I	X

RM2: Provision of Clay

Policy RM2 appends to Policy WMP13 and adds a support for an additional extraction at Aldershaw Tiles without allocating a specific location.

Change Log

SA Version	Note
Regulation 18 Consultation Draft	<ul style="list-style-type: none"> Initial assessment.
Regulation 19 Consultation Draft	<ul style="list-style-type: none"> Revised assessment. Policy now identifies support for development in an area without a specific allocation, subject to a number of criteria.

Assessment

Objectives	Short	Medium	Long	Comments	Prob	Dir/Ind	Rev?
1. To Avoid negative effects and enhance positive effects on health.	N/A	N/A	N/A	No impacts identified.			

2. To protect the amenity of residents and neighbouring land uses.	•	•	•	Any effect on amenity from the allocation of Aldershaw Tiles would be a consequence of traffic movements which will be unchanged from present. The nearest residence is over 800m from the site, direct effects on residential amenity as a result of extraction is considered unlikely. Restoration of the site is unlikely to involve community benefit owing to its size.	H	I	✓
3. To improve equality and access to sustainable waste management.	N/A	N/A	N/A	No impacts identified.			
4. To minimise waste generation and disposal to land.	N/A	N/A	N/A	No impacts identified.			
5. To ensure the sustainable use of local mineral resources.	+	+	?	The support for an additional area of extraction of clay at this site would help enable the continuation of extraction at Aldershaw Tiles. However, the lack of allocation makes the deliverability of the extension more uncertain. If the supported extraction proceeds it would positively contribute to the sustainable use of minerals. Potentially Affected Locations: <u>Aldershaw Tiles</u> .	M	D	X
6. To maintain and improve water quality.	N/A	N/A	N/A	No impacts identified.			
7. To seek the protection of and sustainable use of water resources.	N/A	N/A	N/A	No impacts identified.			
8. To reduce risk and impact of flooding.	N/A	N/A	N/A	No impacts identified.			
9. To limit the causes of and adapt to climate change.	+/?	+/?	?	Support for continued production of minerals at this location will help enable continued local provision of clay, which will reduce distance of travel and associated emissions. Potentially Affected Locations: <u>Plan Area</u> .	M	I	X
10. To protect air quality and reduce air pollution.	N/A	N/A	N/A	No impacts identified.			

11. To reduce adverse impacts of transporting waste and minerals on the environment.	+/ ?	+/?	?	Support for continued production of minerals at this location will help enable continued provision of clay serving the local area. The site is served by existing tile making facility on site, which compliment each other reducing the need for transport. Potentially Affected Locations: <u>Plan Area</u> .	M	I	X
12. To conserve and enhance important soil functions and types.	N/A	N/A	N/A	No impacts identified.			
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	•	•	?	The existing site and area in which additional extraction is proposed is within the High Weald AONB. The policy requires an assessment and appropriate mitigation, if required. The impact is, therefore, likely to be minimal owing to the small levels of extraction. In relation to undesignated historic assets, any area identified for extraction may affect some assets. If this occurs, it would be addressed under Policy RD1. A restoration scheme was not submitted with the original proposal. The potential enhancement to the countryside is unknown. Potentially Affected Locations: <u>Aldershaw Tiles</u> .	M	D	X
14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	•/ ?	•/?	+/ ?	The policy provides support for extraction in connection with the Aldershaw Tiles operation, subject to a number of caveats. Areas of ancient woodland can be found within the Aldershaw Tiles site. Policy RM2 requires any proposed location to assess and potential impact and follow standing advice regarding standoffs and mitigation etc. In the vicinity of the original area submitted for consideration there are local records of protected and notable species including dormouse, great crested newt and bluebell. It is a fair assumption that, given the character of the area, that this would apply to a wider area. An <u>ecological survey</u> should inform any site selection to establish if protected species are present in and around the extraction area. A <u>restoration scheme</u> was not submitted with the original proposal, but one would be required by the RM2/WMP17 on submission of an application. However, given the limited levels of extraction that would be required to meet the sites needs it is anticipated that any positive benefits are likely to be relatively small scale. Potentially Affected Locations: <u>Aldershaw Tiles</u> .	M	D	✓

15. To increase energy efficiency and the proportion of energy generated from renewable sources.	N/A	N/A	N/A	No impacts identified.			
16. To contribute to the growth of a sustainable and diversified economy	+	+	+	Support for continued production of minerals at this location will help enable continued extraction to provide clay for use in construction. However, by not allocating a specific location it reduces the certainty that it will be delivered. Potentially Affected Locations: <u>Plan Area</u> .	M	D	X
17. To provide employment opportunities and develop and maintain a skilled workforce.	+	+	+	Support for continued production of minerals at this location should help support the existing jobs at Aldershaw Tiles. However, by only supporting additional extraction in principle, there is greater uncertainty than if an allocation was made. Potentially Affected Locations: <u>Aldershaw Tiles</u> .	M	D	X

RM3: Safeguarding Minerals Resources

Policy RM3 revises Policies WMP14 and SP8. The alterations to the policy involve the removal of naming safeguarded sites, although these are still identified on the policies map, and removing a direct reference to prior extraction, which is now addressed through RM4. The identified mineral safeguarding areas (MSAs) have been altered through the extension of the MSA over the entire, albeit limited, soft-sand reserve and the removal of the Scotney Court and Scotney Court Extension and Broomhill, Lydd MSAs. In the case of the removal of sites near Lydd, justification relates to the minerals being already worked or there being no potential to work or develop non-minerals development owing to environmental protection designations on those areas. The proposed alterations are considered to not significantly change the direction of policy and consequently are assessed to be *de minimis*.

Change Log

SA Version	Note
Regulation 18 Consultation Draft	<ul style="list-style-type: none"> Initial assessment.
Regulation 19 Consultation Draft	<ul style="list-style-type: none"> Assessment republished unchanged.

RM4: Prior Extraction of Minerals Resources

Under the existing Waste and Minerals Local Plan this is 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". This will be replaced by Policy RM4 and the assessment below assumes Policy SP8 as the status-quo.

Change Log

SA Version	Note
Regulation 18 Consultation Draft	<ul style="list-style-type: none"> Initial assessment.
Regulation 19 Consultation Draft	<ul style="list-style-type: none"> Assessment republished unchanged.

Assessment

Objectives	Short	Medium	Long	Comments	Prob	Dir/Ind	Rev?
1. To Avoid negative effects and enhance positive effects on health.	N/A	N/A	N/A	No impacts identified.			
2. To protect the amenity of residents and neighbouring land uses.	N/A	N/A	N/A	No impacts identified.			
3. To improve equality and access to sustainable waste management.	N/A	N/A	N/A	No impacts identified.			
4. To minimise waste generation and disposal to land.	N/A	N/A	N/A	No impacts identified.			
5. To ensure the sustainable use of local mineral resources.	+	+	+	<p>The requirement for prior extraction will ensure that all safeguarded minerals are not sterilised by development unless it cannot be extracted practically or feasibly.</p> <p>Potentially Affected Locations: <u>Safeguarded Mineral Resources</u>.</p>	?	D	X
6. To maintain and improve water	N/A	N/A	N/A	No impacts identified.			

quality.							
7. To seek the protection of and sustainable use of water resources.	N/A	N/A	N/A	No impacts identified.			
8. To reduce risk and impact of flooding.	N/A	N/A	N/A	No impacts identified.			
9. To limit the causes of and adapt to climate change.	N/A	N/A	N/A	No impacts identified.			
10. To protect air quality and reduce air pollution.	N/A	N/A	N/A	No impacts identified.			
11. To reduce adverse impacts of transporting waste and minerals on the environment.	+	+	+	Promotion of prior extraction will support local minerals provision. The odds of extraction occurring depend on the extent of safeguarding and location of development. Potentially Affected Locations: <u>Plan Area</u> .	?	D	X
12. To conserve and enhance important soil functions and types.	N/A	N/A	N/A	No impacts identified.			
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	N/A	N/A	N/A	No impacts identified.			
14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	•	•	•	An initial assessment of this policy indicated that the prior extraction policy could be conflict with policy protecting geodiversity (WMP27/RD1). A recommendation was made to include <u>clarification of supporting text</u> to provide guidance as to which policy has priority should there be conflict. It is understood this has been incorporated in the Plan and this criteria has been reassessed as neutral on the basis that the policies in combination should enable the most sustainable decision to be			

				taken when an application is being assessed.			
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	N/A	N/A	N/A	No impacts identified.			
16. To contribute to the growth of a sustainable and diversified economy	?	?	?	The extraction of minerals that would otherwise be sterilised will support the provision of minerals for construction demand. The policy may affect the viability of proposed developments, which could affect other policy requirements placed on any sites, for example, prior extraction may reduce the viability of providing affordable housing provision on site. Potentially Affected Locations: <u>Safeguarded Mineral Resources</u> .	?	D	X
17. To provide employment opportunities and develop and maintain a skilled workforce.	N/A	N/A	N/A	No impacts identified.			

RM5: Safeguarding Railheads and Wharves

The policy below has been assessed against the status-quo, i.e. Policy WMP14, which is it intended to replace. The key changes being the introduction of the Agent of Change principle on adjoining developments, which recognises the existing and potential use of the port, and as shown on the policies map the extension of the safeguarded area around the East Quay, Newhaven area.

Change Log

SA Version	Note
Regulation 18 Consultation Draft	<ul style="list-style-type: none"> Initial assessment.
Regulation 19 Consultation Draft	<ul style="list-style-type: none"> Assessment republished unchanged.

Assessment

Objectives	Short	Medium	Long	Comments	Prob	Dir/Ind	Rev?
1. To Avoid negative effects and enhance	N/A	N/A	N/A	No impacts identified.			

positive effects on health.							
2. To protect the amenity of residents and neighbouring land uses.	+	+	+	The Agent of Change principle will help manage expectations as to the expected perceived amenity of future occupiers of adjoining developments. The extension of the safeguarded area should also assist in preventing incomparable development. Potentially Affected Locations: <u>Minerals Facilities - Areas near, Ports & Wharves - Areas near.</u>	M	D	X
3. To improve equality and access to sustainable waste management.	N/A	N/A	N/A	No impacts identified.			
4. To minimise waste generation and disposal to land.	N/A	N/A	N/A	No impacts identified.			
5. To ensure the sustainable use of local mineral resources.	+	+	+	Increased safeguarding as a result of the Agent of Change principle will help protect areas that are or may be required in the handling of minerals. It should increase the overall level of protection that safeguarded sites receive. Increased safeguarding should also indirectly support neighbouring MLPs by providing increased certainty as to future available railhead and wharf capacity. Potentially Affected Locations: <u>Minerals Facilities - Areas near, Ports & Wharves - Areas near.</u>	M	D	X
6. To maintain and improve water quality.	N/A	N/A	N/A	No impacts identified.			
7. To seek the protection of and sustainable use of water resources.	N/A	N/A	N/A	No impacts identified.			
8. To reduce risk and impact of flooding.	N/A	N/A	N/A	No impacts identified.			
9. To limit the causes of and adapt to	N/A	N/A	N/A	No impacts identified.			

climate change.							
10. To protect air quality and reduce air pollution.	N/A	N/A	N/A	No impacts identified.			
11. To reduce adverse impacts of transporting waste and minerals on the environment.	N/A	N/A	N/A	No impacts identified.			
12. To conserve and enhance important soil functions and types.	N/A	N/A	N/A	No impacts identified.			
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	N/A	N/A	N/A	No impacts identified.			
14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	N/A	N/A	N/A	No impacts identified.			
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	N/A	N/A	N/A	No impacts identified.			
16. To contribute to the growth of a sustainable and diversified economy	N/A	N/A	N/A	No impacts identified.			
17. To provide employment opportunities and develop and maintain a skilled workforce.	N/A	N/A	N/A	No impacts identified.			

RM6: Safeguarding facilities for concrete batching, coated materials manufacture and other concrete products within the Plan Area

It is proposed that Policy RM6 will replace Policy SP10. The proposed alterations are considered to not significantly change the direction of policy and consequently are assessed to be *de minimis*.

Change Log

SA Version	Note
Regulation 18 Consultation Draft	<ul style="list-style-type: none"> Initial assessment.
Regulation 19 Consultation Draft	<ul style="list-style-type: none"> Assessment republished unchanged.

RM7: Minerals Consultation Areas

It is proposed the Policy RM7 replaces Policy SP11. The proposed alterations are considered to not significantly change the direction of policy and consequently are assessed to be *de minimis*.

Change Log

SA Version	Note
Regulation 18 Consultation Draft	<ul style="list-style-type: none"> Initial assessment.
Regulation 19 Consultation Draft	<ul style="list-style-type: none"> Assessment republished unchanged.

RD1: Environment and Environmental Enhancement

The majority proposed alterations are considered to not significantly change the direction of policy and have been assessed to be *de minimis*. However, to bring the policy in-line with current national policy, a specific reference to biodiversity net-gain has been added. As this policy has not been subject to SA/SEA at during the formation of the NPPF, an assessment is required.

Change Log

SA Version	Note
Regulation 18 Consultation Draft	<ul style="list-style-type: none"> Initial assessment.
Regulation 19 Consultation Draft	<ul style="list-style-type: none"> Wording of policy has been revised as per description in Plan. Policy assessment reviewed, no change in assessment outcomes.

Assessment

Objectives	Short	Medium	Long	Comments	Prob	Dir/Ind	Rev?
1. To Avoid negative effects and enhance positive effects on health.	N/A	N/A	N/A	No impacts identified.			
2. To protect the amenity of residents and neighbouring land uses.	N/A	N/A	N/A	No impacts identified.			
3. To improve equality and access to sustainable waste management.	N/A	N/A	N/A	No impacts identified.			
4. To minimise waste generation and disposal to land.	N/A	N/A	N/A	No impacts identified.			
5. To ensure the sustainable use of local mineral resources.	N/A	N/A	N/A	No impacts identified.			
6. To maintain and improve water quality.	N/A	N/A	N/A	No impacts identified.			
7. To seek the protection of and sustainable use of water resources.	N/A	N/A	N/A	No impacts identified.			
8. To reduce risk and impact of flooding.	N/A	N/A	N/A	No impacts identified.			
9. To limit the causes of and adapt to climate change.	N/A	N/A	N/A	No impacts identified.			
10. To protect air quality and reduce air pollution.	N/A	N/A	N/A	No impacts identified.			

11. To reduce adverse impacts of transporting waste and minerals on the environment.	N/A	N/A	N/A	No impacts identified.			
12. To conserve and enhance important soil functions and types.	N/A	N/A	N/A	No impacts identified.			
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	•	•	•	The change in the text relating to historic sites is likely to result in more emphasis being placed on the tests within the NPPF. However, the net effect of this on historic sites has been assessed to be neutral.			
14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	•	• / ?	• / ?	In relation to providing net-gain in biodiversity - as the policy is currently worded, it is likely to have no more impact than the existing requirement to maximise biodiversity. In the medium to long term, if the Government mandates specific amounts of net-gain for development, this may result in more positive outcomes. Potentially Affected Locations: <u>Plan Area</u> .	M	D	X
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	N/A	N/A	N/A	No impacts identified.			
16. To contribute to the growth of a sustainable and diversified economy	•	• / ?	• / ?	In the near-term the effect of requiring net-gain in biodiversity has been assessed as neutral on business. However, in the medium to long term, if the Government mandates a specific level of net-gain in biodiversity this may add additional costs and affect the viability of minerals operations , waste facilities and waste businesses, their development and the products and services they provided.	M	D	X
17. To provide employment opportunities and develop and maintain a skilled workforce.	N/A	N/A	N/A	No impacts identified.			

Annex H: Relevant Historic Policy Appraisals

A number of proposed revisions alter the wording of existing policies, but not the strategy. A number of these have been assessed to as being de minimus alterations. For completeness where this has occurred reproductions of the appraisals for the policies are included in this section. The assessments for the following policies can be found in this section.

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:

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

WMP2: Minerals and waste development affecting the South Downs National Park

History

- Emerging Draft W&M Plan (Summer 2011) - Policy 2: Environment (incorporating the National Park)
- Submission W&M Plan (Feb, 2012) - Policy WMP 1: Minerals and waste development affecting the South Downs National Park

Objectives	Short	Medium	Long	Secondary / cumulative	Comments
1. To Avoid negative effects and enhance positive effects on health.	Ø	Ø	Ø	Ø	There is no link to this objective.
2. To protect the amenity of residents and neighbouring land uses.	✓	✓	✓	✓	<ul style="list-style-type: none"> • The policy protects the amenity of the residents within the South Downs National Park (SDNP).
3. To improve equality and access to sustainable waste management.	Ø	Ø	Ø	Ø	There is no link to this objective.
4. To minimise waste generation and disposal to land.	Ø	Ø	Ø	Ø	There is no link to this objective.
5. To ensure the sustainable use of local mineral resources.	Ø	Ø	Ø	Ø	There is no link to this objective.
6. To maintain and improve water quality.	Ø	Ø	Ø	Ø	There is no link to this objective.
7. To seek the protection of and sustainable use of water resources.	Ø	Ø	Ø	Ø	There is no link to this objective.
8. To reduce risk and impact of flooding.	Ø	Ø	Ø	Ø	There is no link to this objective.
9. To limit the causes of and adapt to climate change.	Ø	Ø	Ø	Ø	There is no link to this objective.
10. To protect air quality and reduce air pollution.	Ø	Ø	Ø	Ø	There is no link to this objective.
11. To reduce adverse impacts of transporting waste and minerals on the environment.	Ø	Ø	Ø	Ø	There is no link to this objective.

12. To conserve and enhance important soil functions and types.	Ø	Ø	Ø	Ø	There is no link to this objective.
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	✓	✓	✓	✓	<ul style="list-style-type: none"> The policy protects, conserves and enhances the countryside and historic environment.
14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	✓	✓	✓	✓	<ul style="list-style-type: none"> The policy protects, conserves and enhances biodiversity and geodiversity.
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	Ø	Ø	Ø	Ø	There is no link to this objective.
16. To contribute to the growth of a sustainable and diversified economy	Ø	Ø	Ø	Ø	There is no link to this objective.
17. To provide employment opportunities and develop and maintain a skilled workforce.	Ø	Ø	Ø	Ø	There is no link to this objective.

Summary / Conclusions

- This policy does not link to the majority of SA objectives.
- The policy does however have a positive impact on objectives where there is a link, these are the amenity of residents and the protection, conservation and enhancement of the historic and built environment and biodiversity and geodiversity.

Recommendations

- None

WMP7a & WMP7b: Sustainable Locations for Waste Development (excluding land disposal) & More detailed criteria for waste development

History

- Emerging Draft W&M Plan (Summer 2011) - Policy 22 and 23: Sustainable Locations for Waste Development (excluding land disposal)
- Submission W&M Plan (Feb, 2012) - Policy WMP 6a and 6b: Sustainable Locations for Waste Development (excluding land disposal)

Assumptions

- Policy covers all waste sites including Commercial & Industrial, Municipal Solid Waste, and Construction & Demolition waste.

- Waste will be managed as close to where it arises, which is the main urban settlements and towns. Includes settlements within and close to the SDNP.
- Within the areas of search it is considered that there will be appropriate land that offers sufficient opportunities for new waste recovery capacity that would be required.

Objectives	Short	Medium	Long	Secondary / cumulative	Comments
1. To Avoid negative effects and enhance positive effects on health.	?	?	?	?	<ul style="list-style-type: none"> • Sites will be focused close to where waste arises which is likely to be in urban locations and close to communities. • However, as there will be a preference for sites to be located on industrial and employment land this should be away from communities, though there may still be adverse impacts associated with vehicles accessing the sites. • The policy looks to minimise adverse impacts on communities and regulatory bodies such as the Environment Agency and Environmental Health will operate to ensure facilities do not present a risk to the environment or health. • Potential adverse impacts should also be mitigated by the Development Management policy ensuring that health impacts of proposals are acceptable. • As the specific locations for sites are unknown the overall impact is uncertain however for the reasons above any adverse impacts should be minimal.
2. To protect the amenity of residents and neighbouring land uses.	?	?	?	?	<ul style="list-style-type: none"> • Sites will be focused close to where waste arises which is likely to be in urban locations and close to communities. • However the preference for sites to be located on industrial and employment land has the potential for facilities to be located within appropriate uses, though there may still be adverse impacts associated with vehicles accessing the sites. • The policy looks to minimise adverse impacts on communities and potential adverse impacts should also be mitigated by the Development Management policies. • As the specific locations for sites are unknown the overall impact is uncertain and would depend on the specific details of the site and the type of facility however for the reasons above any adverse impacts should be minimal.
3. To improve equality	✓	✓	✓	✓	<ul style="list-style-type: none"> • The policy should have a positive impact as the

and access to sustainable waste management.					<p>focus is to develop sites close to waste arisings, and this has the potential for services and facilities to be accessible for the public and waste collection authorities.</p> <ul style="list-style-type: none"> • Providing flexibility in the size of sites has the potential to create the most appropriate facility for the location and achieve greater accessibility. • Allowing sites in the SDNP and AONB where justifiable has the potential to achieve good accessibility across the whole plan area. Particularly the market towns of the High Weald AONB as well as the town of Lewes which is now within the SDNP. • The level of impact will depend on the type of facilities, how they are distributed and how they support the waste collection services.
4. To minimise waste generation and disposal to land.	✓	✓	✓	✓	<ul style="list-style-type: none"> • The policy should have a positive impact as the focus is to develop sites close to waste arisings, and this has the potential for services and facilities to be accessible for the public and waste collection authorities. • Providing flexibility in the size of sites has the potential to create the most appropriate facility for the location and achieve greater accessibility. • Allowing sites in the SDNP and AONB where justifiable has the potential to achieve good accessibility across the whole plan area. Particularly the market towns of the High Weald AONB as well as the town of Lewes which is now within the SDNP. • The level of impact will depend on the type of facilities, how they are distributed and how they support the waste collection services.
5. To ensure the sustainable use of local mineral resources.	✓?	✓?	✓?	✓?	<ul style="list-style-type: none"> • The policy provides the potential for a variety of locations to be identified. This gives sufficient flexibility to the waste industry to deliver a wide range of recovery facilities leading to more waste diverted from landfill and being managed higher up the waste hierarchy. • It provides the flexibility needed to accommodate changes in waste management practices/technologies and waste streams. • The level of impact will depend on the site selection process and how sites are ultimately developed.

					<ul style="list-style-type: none"> Positive impacts are likely to increase over time.
6. To maintain and improve water quality.	?	?	?	?	<ul style="list-style-type: none"> The policy provides the potential for a variety of sizes and locations to be identified. This would give sufficient flexibility to enable construction and demolition waste sites to be identified when necessary. This would lead to the potential for more recycling of aggregates reducing the need for raw materials to be used.
7. To seek the protection of and sustainable use of water resources.	Ø	Ø	Ø	Ø	<ul style="list-style-type: none"> The policy may have adverse impacts on water quality, dependent on the specific location of sites and the nature of the development. Regulatory bodies such as the Environment Agency will operate to ensure discharges are within safe and acceptable limits, however beyond these environmental standards some negative impacts may remain. Potential adverse impacts should be mitigated by the Development Management policy.
8. To reduce risk and impact of flooding.	?	?	?	?	<ul style="list-style-type: none"> There is potential for adverse impacts on flood risk, although impacts are uncertain. Potential adverse impacts should be mitigated by the Development Management policy as well as through application of the Strategic Flood Risk Assessment during the site selection process.
9. To limit the causes of and adapt to climate change.	✓	✓	✓	✓	<ul style="list-style-type: none"> The policy has the potential to reduce greenhouse gas emissions. Locating sites close to the source of waste arisings could reduce transportation and therefore CO2 emissions. Preference for locations already in waste management uses and in industrial areas has the potential for co-location of activities further reducing transportation and CO2 emissions. The policy has the potential to increase the capacity for recovery waste management and divert more waste from disposal to land reducing methane emissions. Proposals outside the Area of Search will only be considered if the development contributes to moving waste up the hierarchy and minimises greenhouse gas

					emissions.
10. To protect air quality and reduce air pollution.	x?	x?	x?	x	<ul style="list-style-type: none"> The focus on locating development close to waste arisings and the preference for sites on industrial and employment land is likely to lead to locations in urban areas, where in some cases air quality thresholds are close to or have been exceeded. This may increase or maintain poor air quality. The impact would depend on the specific location and whether mitigation measures could reduce impacts to acceptable levels. The risk is likely to increase over time as more sites are developed. Other developments (e.g. housing and employment) are also likely to be concentrated in urban areas therefore the cumulative impact would be significant.
11. To reduce adverse impacts of transporting waste and minerals on the environment.	✓	✓	✓	✓	<ul style="list-style-type: none"> Focusing on the proximity of the source of waste arisings, as well as on the strategic road network, has the potential to reduce the transportation of waste. The preference for sites already in waste management uses or on industrial/employment land could lead to integration of complementary activities and businesses, thereby reducing secondary transportation impacts. The policy would not restrict the potential for the limited opportunities for modal shift from road to rail or water to be exploited as most opportunities are at locations linked or close to towns and urban settlements. The flexibility of the policy to allow delivery of smaller sites within the AONB and SDNP would meet localised need and result in reduced transportation. The level of impact will depend on the type of facilities, their distribution, the site selection process and how industry develops and operates on the site.
12. To conserve and enhance important soil functions and types.	✓?	✓?	✓?	✓?	<ul style="list-style-type: none"> As preference is given to previously- developed land (PDL) which could contain contaminated soils there is potential for this to lead to benefits associated with de-contamination. There is maybe potential for adverse impacts, however the impacts are uncertain due to the unknown location of sites. Impacts should be mitigated by the Development

					Management policies.
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	?	?	?	?	<ul style="list-style-type: none"> As preference is given to sites already in waste management uses, industrial and employment land and PDL this is likely to protect and conserve the countryside and historic and built environment. But as specific locations are unknown impacts are generally uncertain as there is even with the preferences listed above potential for impacts on the countryside, including the AONB and SDNP, and the historic built environment. Some protection of the AONB and SDNP exists in the policies as it states that development will only be permitted where the designation is not compromised, but it is still uncertain how this will be implemented. Any potential adverse impacts should be mitigated by the Development Management policy.
14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	?	?	?	?	<ul style="list-style-type: none"> It is possible that this policy will have adverse impacts on biodiversity and geodiversity however the policy states that proposals will need to minimise adverse impacts on the environment. PDL sites may have significant local biodiversity potential therefore there is potential for adverse impacts on this objective from a preference to PDL. However there is also preference for sites already in waste management uses and industrial and employment land and this is likely to protect and conserve biodiversity elsewhere as these sites are likely not to contain significant biodiversity and geodiversity assets. Overall impacts are uncertain and will depend on how environmental criteria are considered through the site selection process. Potential adverse impacts should be mitigated by the Development Management Policy.
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	√?	√?	√?	√?	<ul style="list-style-type: none"> There is the potential for the policy to increase energy efficiency and the proportion of energy generated but it will depend upon implementation. Focusing locations close to towns and settlements would provide opportunities to maximise the potential and use of low carbon technologies e.g. Combined Heat and Power. Providing locations of varying sizes may enable the

					potential for large facilities to be developed where appropriate which would provide a higher throughput creating greater potential to capture energy and or heat.
16. To contribute to the growth of a sustainable and diversified economy	✓	✓	✓	✓	<ul style="list-style-type: none"> The policy provides the opportunity for a variety of sizes and locations to be identified. This gives sufficient flexibility to the waste industry to deliver a wide range of facilities. It also provides the flexibility needed to accommodate changes in waste management practices/technologies. Potential exists for waste to be managed in a more economical manner, enabling the full recovery value of waste to be realised. It would also provide the opportunity for waste to be managed within the plan area and for waste recovery markets to be expanded. Focusing on locations in towns and settlements and on industrial and employment land would provide the potential for links to be made with other related businesses. The level of impact would depend on the site selection process and how sites are ultimately developed. Positive impacts are likely to increase over time.
17. To provide employment opportunities and develop and maintain a skilled workforce.	Ø	Ø	Ø	Ø	<ul style="list-style-type: none"> The type and location of new jobs is unknown and the link to this objective is considered to be insignificant.

Summary / Conclusions

- The policy provides the potential for a variety of sizes and locations to be identified. This gives sufficient flexibility to the waste industry to deliver a wide range of facilities, as needed. It also provides the flexibility needed to accommodate changes in waste management practices and technologies. This would have positive impacts on the waste, minerals, climate change and economy objectives. Also preference for sites on previously developed land has the potential for benefits associated with de-contamination.
- The focus on locations close to the source of waste arisings and on sites already in waste management uses has the potential for positive impacts on accessibility and reducing transportation. There would also be opportunities to achieve maximum potential and use of low carbon technologies, e.g. combined heat and power.
- The preference for sites to be located on industrial and employment land and on sites already in waste management uses would potentially lead to sites being developed away from communities which would have benefits for health, amenity, it would also potentially protect the countryside and biodiversity. However as specific locations are unknown the overall impact on these objectives is uncertain. Any impacts would depend on the environmental criteria during the site selection process, as well as the strength of environmental Development Management policies.

- The impact on flood risk and water quality are also uncertain, although licensing regimes administered by other authorities and assessments such as the Strategic Flood Risk Assessment should ensure that adverse impacts are avoided.
- The only potential for negative impacts is on the air quality objective as the policy would focus development in urban areas where in some cases air quality thresholds are close to or have been exceeded.

WMP13: Provision of Clay

History

- Emerging Draft W&M Plan (Summer 2011) - Policy 17: Need for Clay
- Submission W&M Plan (Feb, 2012) - Policy WMP 12: Provision of Clay

Assumptions

- Policy is focused on extraction at brickworks. Imports to brickworks will only be supported in exceptional cases and will be from areas as close as practicable to the brickworks, as outlined in the supporting text.
- Specific sites which have the potential to expand are unknown.
- New sites are generally not supported. Only in exceptional cases for flood defences and will need be located as closely as practicable to the areas in which the flood defences are required, as outlined in the supporting text.
- There are potential further reserves at existing brickwork sites.
- Extraction of clay for flood defence use is secondary to clay to be used by brickworks.
- Actual demand for flood defences is uncertain at this stage.
- Small amounts of clay have been used before in the plan area for flood defences, although use of other material is more common for major works.
- Sites appear to already be maximising recycling on-site.

Objectives	Short	Medium	Long	Secondary / cumulative	Comments
1. To Avoid negative effects and enhance positive effects on health.	?	?	?	?	<ul style="list-style-type: none"> • There is potential for impacts from extending extraction areas at brickworks, as sites are close to residential areas. Impacts and potential mitigation would though depend on the specific boundary of the extension • New extraction sites for flood defences may potentially impact on communities. Impacts would depend on the location of the site and where the flood defences are. • It is assumed that regulatory bodies such as the Environment Agency and Environmental Health will operate to ensure facilities do not present a risk to human health. • Some minor impacts may remain; these should be mitigated by general Development Management policies to protect communities, although it is unclear at this stage to what extent all adverse health impacts would be addressed by these policies.

2. To protect the amenity of residents and neighbouring land uses.	?	?	?	?	<ul style="list-style-type: none"> • There is potential for impacts from extending extraction areas at brickworks, as sites are close to communities. Impacts and potential mitigation would depend on the specific boundary of extensions. • New extraction sites for flood defences may also potentially impact on communities. Impacts would depend on the location of the site and where the flood defences are. • It is assumed that regulatory bodies will operate to ensure facilities do not present a risk to communities. • Some minor impacts may remain; these should be mitigated by general policies to protect communities, although it is uncertain how issues of amenity will be covered by these policies.
3. To improve equality and access to sustainable waste management.	Ø	Ø	Ø	Ø	<ul style="list-style-type: none"> • No link to objective as this issue is about use of mineral resources
4. To minimise waste generation and disposal to land.	✓	✓	✓	✓	<ul style="list-style-type: none"> • This policy does not specifically encourage maximising recycling; however there is evidence to show that recycling is at this time being undertaken on site. It is assumed that there is scope to continue and/or increase recycling on these sites. The Authorities can influence working of the sites when new permissions are required, or when reviews of mineral applications take place.
5. To ensure the sustainable use of local mineral resources.	✓?	✓?	✓?	✓?	<ul style="list-style-type: none"> • The policy encourages the recycling of clay products and therefore does not rely solely on primary clay resources. • The policy does try to control mineral resources efficiently by managing demand within the plan area and to protect reserves wherever possible.
6. To maintain and improve water quality.	x?	x?	x?	x?	<ul style="list-style-type: none"> • The policy could lead to extraction of new reserves both for brickworks or flood defences. Therefore there is potential for adverse impacts. These are however uncertain and would depend on the specific location of sites. • Potential adverse impacts should be mitigated by the proposed policy requiring proposals to minimise impacts on the environment, which it is expected would include water quality. Regulatory bodies such as the Environment Agency will also operate to ensure emissions are within safe and acceptable limits.

7. To seek the protection of and sustainable use of water resources.	Ø	Ø	Ø	Ø	<ul style="list-style-type: none"> No link because any potential impacts would depend on how sites/facilities are operated.
8. To reduce risk and impact of flooding.	?	?	?	?	<ul style="list-style-type: none"> The supporting text aims to meet the need of flood risk; however this issue should be addressed within the policy. Demand at this stage is unknown but should be met either from existing reserves or where this is not acceptable clay or other materials will be extracted from new sites as long as it is in accordance with other plan policies.
9. To limit the causes of and adapt to climate change.	✓	✓	✓	✓	<ul style="list-style-type: none"> The policy aims to reduce transportation of materials as it focuses on extensions or the extraction of further resources and the recycling and stockpiling at brickworks, therefore it has positive impacts against this objective. The policy also has potential for positive impacts as it aims to support the construction of flood defences which would help in adapting to climate change.
10. To protect air quality and reduce air pollution.	✓	✓	✓	✓	<ul style="list-style-type: none"> The policy aims to reduce transportation of materials as it focuses on extensions or the extraction of further resources and the recycling and stockpiling at brickworks, therefore it has positive impacts against this objective. There is potential for impacts from imports and new sites for flood defences these though will only be allowed in exceptional circumstances and extraction sites will need to be located close to brickworks or flood defences so reducing transportation and the likely adverse impacts on air quality.
11. To reduce adverse impacts of transporting waste and minerals on the environment.	✓	✓	✓	✓	<ul style="list-style-type: none"> The policy aims to reduce transportation of materials as it focuses on extensions or the extraction of further resources and the recycling and stockpiling at brickworks, it therefore has positive impacts against this objective. In the supporting text imports to brickworks are only supported in exceptional cases and would need to be from areas as close to the brickworks as practicable. Sites for flood defences may be supported but would need to be located as closely as practicable to the areas in which the flood defences are required.

12. To conserve and enhance important soil functions and types.	x?	x?	x?	x?	<ul style="list-style-type: none"> This policy supports extensions to existing sites and may allow new extraction sites for flood defences, these may have adverse impacts on the objective. Impacts however are uncertain and would depend on the specific location of sites. There is a possibility that there may be a need for stockpiling, this could potentially restore / improve soil quality.
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	x?	x?	x?	x?	<ul style="list-style-type: none"> This policy supports extensions to existing sites and may allow new extraction sites for flood defences therefore there is potential for adverse impacts on this objective. The extent, as to whether designated sites can be avoided, would depend on specific site characteristics and site investigation/selection work for further reserves Other plan policies, which this policy will be subject to, will provide certain protection to the environment and should avoid/mitigate most adverse impacts.
14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	x?	x?	x?	x?	<ul style="list-style-type: none"> This policy supports extensions to existing sites and may allow new extraction sites for flood defences therefore there is potential for adverse impacts on this objective. The extent, as to whether designated sites can be avoided, would depend on specific site characteristics and site investigation/selection work for further reserves. Other plan policies, which this policy will be subject to, will provide certain protection to the environment and should avoid/mitigate most adverse impacts.
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	Ø	Ø	Ø	Ø	<ul style="list-style-type: none"> No significant impacts. Impacts would depend on sites, and how they are operated.
16. To contribute to the growth of a sustainable and diversified economy	✓	✓	✓	✓	<ul style="list-style-type: none"> Policy would enable brick production to continue to meet demands either from primary resources, recycling on-site or from imports. Also this policy would enable the necessary materials to be provided to support the construction of flood defences leading to protection of properties and allowing economic growth and regeneration to be achieved in areas at risk of flooding.

17. To provide employment opportunities and develop and maintain a skilled workforce.	Ø	Ø	Ø	Ø	<ul style="list-style-type: none"> No link with objective.
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Summary / Conclusions

- The policy performs positively towards the economy as it identifies alternative ways which will ensure brick production continues at sites in the plan area. It also aims to support the construction of flood defences by providing materials through a variety of ways which would help in adapting to climate change and could allow economic growth and regeneration to be achieved in areas at risk of flooding.
- The policy would meet demand primarily from primary resources. However the policy suggests that recycling of clay products and stockpiling of waste materials on site for re-use will be encouraged.
- The policy aims to reduce transportation of materials as it focuses on extensions or the extraction of further resources and the recycling and stockpiling at brickworks, Also if in exceptional circumstances imports and new sites for flood defences are allowed they will need to be located close to brickworks or flood defences also reducing transportation and leading to positive impacts on climate change and air quality.
- There is potential for adverse impacts on some of the objectives due to further extensions of sites and as the supporting text shows that extraction of new reserves for flood defences would be allowed in exceptional circumstances. Impact would however be dependent on specific locations and site characteristics. Regulative bodies will ensure that sites operate at acceptable limits and other policies do aim to provide certain protection which should avoid/mitigate most potential adverse impacts.

Recommendations

- The policy wording surrounding the issue of recycling should be strengthened, suggest using 'maintaining' and 'maximising'.
- Policy should include position regarding imports.
- Flood risk as an issue should also be dealt within the policy itself.
- It is recommended that the policy be presented on two levels. Firstly the main policy drive (which is sustaining brickworks, and promoting recycling), and then the exceptions part of the policy i.e. 'imports of clay will not be encouraged unless...'

WMP14: Safeguarding Mineral Resources

History

- Emerging Draft W&M Plan (Summer 2011) - Policy 18: Safeguarding Mineral Resources (Resources and Reserves)
- Submission W&M Plan (Feb, 2012) - Policy WMP13: Safeguarding Mineral Resources

Assumptions

- The aim of the policy is to protect mineral resources for potential use in the future. Safeguarding does not imply that the area will be worked for minerals or that other types of development cannot take place which would not stop extraction of the minerals in the future.
- Safeguarded sites will include areas of extensions although this would be part of existing planning permissions only. Therefore no additional land take would be required to deliver the policy.

Objectives	Short	Medium	Long	Secondary / cumulative	Comments

1. To Avoid negative effects and enhance positive effects on health.	Ø	Ø	Ø	Ø	<ul style="list-style-type: none"> • There is unlikely to be any significant impacts from safeguarding because by choosing to safeguard the resource there would not necessarily be any change from the current land use. • There may be potential impacts should the site later be used for extraction of minerals but this would be considered at that time and regulatory bodies such as the Environment Agency and Environmental Health would operate to ensure facilities do not present a risk to the environment or human health. • Mineral resources needed within the plan period will only require a small number of sites to be safeguarded. Many of these are sites that are working currently or have existing permissions therefore impacts would have already been assessed and found to be acceptable.
2. To protect the amenity of residents and neighbouring land uses.	Ø	Ø	Ø	Ø	<ul style="list-style-type: none"> • There is unlikely to be any significant impacts from safeguarding because by choosing to safeguard the resource there would not necessarily be any change from the current land use. • There may be potential impacts should the site later be used for extraction of minerals but this would be considered at that time. • Mineral resources needed within the plan period will only require a small number of sites to be safeguarded. Many of these are sites that are working currently or have existing permissions therefore impacts would have already been assessed and found to be acceptable.
3. To improve equality and access to sustainable waste management.	Ø	Ø	Ø	Ø	There is no link to the objective as this issue is about use of mineral resources
4. To minimise waste generation and disposal to land.	Ø	Ø	Ø	Ø	There is no link to the objective as this issue is about use of primary mineral resources.
5. To ensure the sustainable use of local mineral resources.	✓	✓	✓	✓	<ul style="list-style-type: none"> • Policy has the potential to manage resources efficiently • Identifying Mineral Consultation Areas ensures that safeguarding is not overly restrictive and decisions can be taken on resource viability if and

					<p>when potentially sterilising applications come forward. It also ensures a certain level of protection of resources for the long term.</p> <ul style="list-style-type: none"> • Dormant and inactive sites will be considered through a Mineral Sites DPD which will devise a framework for such sites including assessing viability and seeking restoration where appropriate.
6. To maintain and improve water quality.	Ø	Ø	Ø	Ø	<ul style="list-style-type: none"> • There is unlikely to be any significant impacts from safeguarding. By choosing to safeguard the resource there would not necessarily be any change from the current land use. There may be potential impacts should the site later be used for extraction of minerals but this would be considered at that time. • Mineral resources needed within the plan period will only require a small number of sites to be safeguarded and many of these are sites that are working currently or have existing permissions therefore impacts would have already been assessed and found to be acceptable.
7. To seek the protection of and sustainable use of water resources.	Ø	Ø	Ø	Ø	<ul style="list-style-type: none"> • There is unlikely to be any significant impacts from safeguarding. By choosing to safeguard the resource there would not necessarily be any change from the current land use. There may be potential impacts should the site later be used for extraction of minerals but this would be considered at that time. • Mineral resources needed within the plan period will only require a small number of sites to be safeguarded and many of these are sites that are working currently or have existing permissions therefore impacts would have already been assessed and found to be acceptable.
8. To reduce risk and impact of flooding.	Ø	Ø	Ø	Ø	<ul style="list-style-type: none"> • There is unlikely to be any significant impacts from safeguarding. By choosing to safeguard the resource there would not necessarily be any change from the current land use. There may be potential impacts should the site later be used for extraction of minerals but this would be considered at that time. • Mineral resources needed within the plan period will only require a small number of sites to be safeguarded and many of these are sites that are working currently or have existing permissions therefore impacts would have already been

					assessed and found to be acceptable.
9. To limit the causes of and adapt to climate change.	0	0	0	✓	<ul style="list-style-type: none"> There is unlikely to be any significant impacts from safeguarding resources as there would not necessarily be any change from the current land use. There may be potential impacts should the site later be used for extraction of minerals but this would be considered at that time.
10. To protect air quality and reduce air pollution.	0	0	0	0	<ul style="list-style-type: none"> There is unlikely to be any significant impacts from safeguarding resources as there would not necessarily be any change from the current land use. There may be potential impacts should the site later be used for extraction of minerals but this would be considered at that time.
11. To reduce adverse impacts of transporting waste and minerals on the environment.	✓	✓	✓	✓	<ul style="list-style-type: none"> Safeguarding resources in the plan area will reduce the need to import resources in the future. This is likely to lead to a reduction in the overall transportation of minerals.
12. To conserve and enhance important soil functions and types.	0	0	0	0	<ul style="list-style-type: none"> There is unlikely to be any significant impacts from safeguarding. By choosing to safeguard the resource there would not necessarily be any change from the current land use. There may be potential impacts should the site later be used for extraction of minerals but this would be considered at that time. Mineral resources needed within the plan period will only require a small number of sites to be safeguarded and many of these are sites that are working currently or have existing permissions therefore impacts would have already been assessed and found to be acceptable.
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	0	0	0	0	<ul style="list-style-type: none"> There is unlikely to be any significant impacts from safeguarding. By choosing to safeguard the resource there would not necessarily be any change from the current land use. There may be potential impacts should the site later be used for extraction of minerals but this would be considered at that time. Mineral resources needed within the plan period may only require a small number of sites to be safeguarded and many of these are sites that are working currently or have existing permissions therefore impacts would have already been assessed and found to be acceptable.

14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	Ø	Ø	Ø	Ø	<ul style="list-style-type: none"> There is unlikely to be any significant impacts from safeguarding. By choosing to safeguard the resource there would not necessarily be any change from the current land use. There may be potential impacts should the site later be used for extraction of minerals but this would be considered at that time. Mineral resources needed within the plan period may only require a small number of sites to be safeguarded and many of these are sites that are working currently or have existing permissions therefore impacts would have already been assessed and found to be acceptable.
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	Ø	Ø	Ø	Ø	<ul style="list-style-type: none"> There is no significant impact on this objective. Impacts would depend on operational details of sites when and if they are ultimately developed.
16. To contribute to the growth of a sustainable and diversified economy	✓	✓	✓	✓	<ul style="list-style-type: none"> By safeguarding mineral resources the policy will help ensure supplies of sufficient minerals to support future economic growth.
17. To provide employment opportunities and develop and maintain a skilled workforce.	Ø	Ø	Ø	Ø	<ul style="list-style-type: none"> There is unlikely to be any significant impacts from safeguarding. By choosing to safeguard the resource there would not necessarily be any change from the current land use. There may be potential impacts should the site later be used for extraction of minerals but this would be considered at that time.

Summary / Conclusions

- The policy has the potential to manage resources efficiently and ensure sufficient supplies of minerals to meet future economic growth potentially reducing the need to import materials.
- The policy will therefore have positive impacts on objectives related to mineral resources, transport and the economy.
- There is unlikely to be any significant impact from safeguarding on other SA objectives as there would not necessarily be any change from the current land use. There may be potential

Recommendations

- None

WMP27: Environment and Environmental Enhancement

History

- Emerging Draft W&M Plan (Summer 2011) - Policy 40: Environmental Improvements and Other Benefits

• Submission W&M Plan (Feb, 2012) - Policy WMP 26: Environment and Environmental Enhancement

Objectives	Short	Medium	Long	Secondary / cumulative	Comments
1. To Avoid negative effects and enhance positive effects on health.	Ø	Ø	Ø	✓	<ul style="list-style-type: none"> There are likely possible indirect / cumulative positive impacts on the objective. Improvement on the environment in general would impact on the health receptors i.e. air and noise. Protection of the countryside and public access can bring health benefits through walking and other healthy activities which also improves well being.
2. To protect the amenity of residents and neighbouring land uses.	✓	✓	✓	✓	<ul style="list-style-type: none"> Amenity will be protected by the policy through conserving the local character and environment. Ensuring developments do not have significant adverse impact on for example listed buildings, their settings, conservation areas and historic parks and gardens. Sites recognised for their local significance will also be protected.
3. To improve equality and access to sustainable waste management.	Ø	Ø	Ø	Ø	No link with objective.
4. To minimise waste generation and disposal to land.	Ø	Ø	Ø	Ø	No link with objective.
5. To ensure the sustainable use of local mineral resources.	Ø	Ø	Ø	Ø	No link with objective.
6. To maintain and improve water quality.	✓	✓	✓	✓	<ul style="list-style-type: none"> There are positive benefits to water quality through the protection of Ramsar sites and Sites of Special Scientific Interests as these include wetland areas and ditches.
7. To seek the protection of and sustainable use of water resources.	Ø	Ø	Ø	✓	<ul style="list-style-type: none"> There is an indirect positive impact on water resources through the protection of geodiversity.
8. To reduce risk and	Ø	Ø	Ø	✓	<ul style="list-style-type: none"> There is an indirect positive link to flooding

impact of flooding.					and flood risk. As areas that are protected by the policy are also likely to be in the floodplain.
9. To limit the causes of and adapt to climate change.	Ø	Ø	Ø	Ø	No link with objective.
10. To protect air quality and reduce air pollution.	Ø	Ø	Ø	Ø	No link with objective.
11. To reduce adverse impacts of transporting waste and minerals on the environment.	Ø	Ø	Ø	Ø	No link with objective.
12. To conserve and enhance important soil functions and types.	✓	✓	✓	✓	<ul style="list-style-type: none"> • There is a positive impact on the objective as the policy refers to protection of agricultural land. • The policy should be strengthened in conserving and enhancing soil quality. (see recommendations)
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	✓	✓	✓	✓	<ul style="list-style-type: none"> • The policy protects, conserves and enhances the countryside and the historic and built environment.
14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	✓	✓	✓	✓	<ul style="list-style-type: none"> • The policy protects, conserves and enhances biodiversity and geodiversity. • Ancient woodlands should be included within the sub-text of the policy.
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	Ø	Ø	Ø	Ø	No link with objective.
16. To contribute to the growth of a sustainable and diversified economy	Ø	Ø	Ø	Ø	No link with objective.
17. To provide employment opportunities and develop and maintain a skilled	Ø	Ø	Ø	Ø	No link with objective.

workforce.					
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Summary / Conclusions

- As the policy aims to protect the environment impacts where there is a link to SA objectives are positive. These are amenity, water quality, soil, the countryside, historic and built environment and biodiversity and geodiversity.
- There are also secondary/ cumulative positive impacts on health, water resources and flooding.

SP6: Safeguarding Waste Sites

Objectives	Short	Medium	Long	Comments	Prob	Dir/Ind	Rev?
1. To Avoid negative effects and enhance positive effects on health.	+	+	?	By seeking to prevent existing waste facilities from being prejudiced from development proposals, the policy will indirectly help to ensure that adverse impacts on health from waste facilities on surrounding uses are prevented.	H	I	✓
2. To protect the amenity of residents and neighbouring land uses.	+/-	+/-	?/-	By seeking to prevent existing waste facilities from being prejudiced from development proposals, the policy will indirectly help to ensure that adverse impacts on amenity from waste facilities on surrounding uses are prevented. Some sites are close to residential properties and buffers and additional screening are required to reduce the likelihood of adverse impacts.	H	I	✓ / X
3. To improve equality and access to sustainable waste management.	+	+	?	By safeguarding existing waste facilities the policy will help to support enterprises involved in sustainable waste management.	H	D	✓
4. To minimise waste generation and disposal to land.	+	+	?	By safeguarding existing waste facilities the policy will help to provide facilities to minimise disposal of waste to land. Sites would provide opportunities for facilities to be developed which will reduce the amount of waste landfilled and actively promote the waste hierarchy. It may also increase reuse or recycling depending on the type of facility developed	H	D	✓
5. To ensure the sustainable use of local mineral resources.	+	+	?	By safeguarding recycled and secondary aggregates facilities, the policy will help to encourage and maximise the use of these materials and in so doing enable efficient management of mineral resources. It will also	H	B	✓

				indirectly support sustainable construction and demolition.			
6. To maintain and improve water quality.	?	•	•	One site requires a risk assessment to demonstrate no risk to water quality.			
7. To seek the protection of and sustainable use of water resources.	N/A	N/A	N/A	Not relevant			
8. To reduce risk and impact of flooding.	•/-	•/-	•/-	Not relevant			
9. To limit the causes of and adapt to climate change.	+	+	?	By safeguarding existing and new waste sites, the policy will help to ensure sufficient facilities within the Plan Area to deal with waste arisings. This will minimise waste transport distances and promote waste recycling and energy recovery, leading to reduced energy use and reduced greenhouse gas emissions.	M	I	✓
10. To protect air quality and reduce air pollution.	+/-	+/-	?/-	By safeguarding existing waste sites, the policy will help to ensure sufficient facilities within the Plan Area to deal with waste arisings. This will minimise waste transport distances and will contribute to avoiding adverse impacts on air quality from waste transport. One site is close to an AQMA but effective routing of vehicles could avoid adverse impacts.	L	I	✓
11. To reduce adverse impacts of transporting waste and minerals on the environment.	+	+	?	By safeguarding existing waste sites, the policy will help to ensure sufficient facilities within the Plan Area to deal with waste arisings. This will minimise waste transport distances and reduce adverse impacts of waste transport on the environment. It may also help to promote local supplies of recycled minerals. Some sites are located close to centres of population, which will help to reduce waste transport.	H	I	✓
12. To conserve and enhance important soil functions and types.	+/-	+/-	?/-	By safeguarding recycling facilities, the policy will indirectly help to ensure the supply of compost which can be used as a soil improver. One site is greenfield. Part of another site is greenfield and grade 3 agricultural land and soil will be lost to	L/H	B	✓ / ×

				development.			
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	+/-	+/-	?/-	By safeguarding secondary and recycled aggregates facilities, the policy will indirectly help to reduce adverse impacts of mining on landscape and countryside, including on the SDNP and AONB. It will also help to optimise the use of previously developed land. However, one site is close to the SDNP and adverse visual impacts are possible. Additional screening and a high quality design should be provided to minimise the visual impacts. Some sites have the potential for archaeology to have survived and an assessment of archaeological value should be undertaken.	M/H	I	✓
14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	+/-	+/-	?/-	By safeguarding secondary and recycled aggregates facilities, the policy will indirectly help to conserve geological resources in the Plan Area. It will also help to ensure sufficient facilities to deal with the Plan Area's waste, which will help to reduce waste transport and may indirectly reduce adverse impacts of poor air quality on biodiversity, although this is much more strongly dependent on other policies and strategies. Several of the sites are close to sites of nature conservation importance and adverse effects are possible, including from reduced air quality, direct land-take, disturbance and predation.	L/M	I	✓
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	+	+	?	By safeguarding existing and new waste facilities, the policy will encourage recovery of energy from waste and indirectly help to encourage local supply chains in recycled materials and compost.	M/H	B	✓
16. To contribute to the growth of a sustainable and diversified economy	+	+	?	By safeguarding existing and new waste facilities, the policy will support businesses involved in sustainable waste management activities, and ensure the supply of recycled minerals to support sustainable construction. It will maximise the recovery of value from waste. The policy also seeks to minimise adverse impacts on neighbouring sites which may be used by local businesses.	H	D	✓
17. To provide employment opportunities and	+	+	+	Development of sites will create job opportunities, although this is not likely to significantly improve overall employment	M	I	×

develop and maintain a skilled workforce.				prospects for East Sussex.			
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SP8: Mineral Safeguarding Areas and Mineral Consultation Areas for land-won minerals resources within the Plan Area

Objectives	Short	Medium	Long	Comments	Prob	Dir/Ind	Rev?
1. To Avoid negative effects and enhance positive effects on health.	N/A	N/A	N/A	Not relevant.			
2. To protect the amenity of residents and neighbouring land uses.	N/A	N/A	N/A	Not relevant.			
3. To improve equality and access to sustainable waste management.	N/A	N/A	N/A	Not relevant.			
4. To minimise waste generation and disposal to land.	N/A	N/A	N/A	Not relevant.			
5. To ensure the sustainable use of local mineral resources.	+	+	?	The policy directly seeks to safeguard mineral sites to safeguard mineral resources and manage them efficiently.	H	D	✓
6. To maintain and improve water quality.	N/A	N/A	N/A	Not relevant.			
7. To seek the protection of and sustainable use of water resources.	N/A	N/A	N/A	Not relevant.			
8. To reduce risk and impact of flooding.	N/A	N/A	N/A	Not relevant.			
9. To limit the causes of and adapt to climate change.	N/A	N/A	N/A	Not relevant.			
10. To protect air quality and reduce air pollution.	N/A	N/A	N/A	Not relevant.			

11. To reduce adverse impacts of transporting waste and minerals on the environment.	+	+	?	By safeguarding mineral resources, the policy will help to encourage local supplies of minerals.	H	D	✓
12. To conserve and enhance important soil functions and types.	N/A	N/A	N/A	Not relevant.			
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	N/A	N/A	N/A	Not relevant.			
14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	N/A	N/A	N/A	Not relevant.			
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	N/A	N/A	N/A	Not relevant.			
16. To contribute to the growth of a sustainable and diversified economy	+	+	?	By safeguarding mineral resources, the policy will help to ensure sufficient minerals are available to support construction of housing and infrastructure to support economic growth.	H	D	✓
17. To provide employment opportunities and develop and maintain a skilled workforce.	+	+	?	The policy will indirectly support the provision of jobs in some rural and deprived areas.	H	I	✓

SP11: Minerals Consultation Areas

Objectives	Short	Medium	Long	Comments	Prob	Dir/Ind	Rev?
1. To Avoid negative effects and enhance positive effects on health.	+	+	?	By seeking to prevent incompatible development, the policy will indirectly help to ensure that adverse impacts on health from minerals sites on surrounding uses are prevented.	H	I	✓
2. To protect the amenity of	+	+	?	By seeking to prevent incompatible	H	I	✓

residents and neighbouring land uses.				development, the policy will indirectly help to ensure that adverse impacts on amenity from minerals sites on surrounding uses are prevented.			
3. To improve equality and access to sustainable waste management.	N/A	N/A	N/A	Not relevant.			
4. To minimise waste generation and disposal to land.	N/A	N/A	N/A	Not relevant.			
5. To ensure the sustainable use of local mineral resources.	+	+	?	The policy directly seeks to safeguard minerals sites, helping to ensure efficient management of resources.	H	D	✓
6. To maintain and improve water quality.	N/A	N/A	N/A	Not relevant.			
7. To seek the protection of and sustainable use of water resources.	N/A	N/A	N/A	Not relevant.			
8. To reduce risk and impact of flooding.	N/A	N/A	N/A	Not relevant.			
9. To limit the causes of and adapt to climate change.	N/A	N/A	N/A	Not relevant.			
10. To protect air quality and reduce air pollution.	N/A	N/A	N/A	Not relevant.			
11. To reduce adverse impacts of transporting waste and minerals on the environment.	N/A	N/A	N/A	Not relevant.			
12. To conserve and enhance important soil functions and types.	N/A	N/A	N/A	Not relevant.			
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	N/A	N/A	N/A	Not relevant.			

14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	N/A	N/A	N/A	Not relevant.			
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	N/A	N/A	N/A	Not relevant.			
16. To contribute to the growth of a sustainable and diversified economy	+	+	?	By safeguarding mineral sites, the policy will help to ensure sufficient minerals are available to support construction of housing and infrastructure to support economic growth.	M	D	✓
17. To provide employment opportunities and develop and maintain a skilled workforce.	+	+	?	The policy will indirectly support the provision of jobs in some rural and deprived areas.	H	D	✓

Annex I: Combined Policy Appraisal*

The table below brings together the policy appraisals and reorders them by objective. This provides an overview of the impact of the revised policies as a whole when the policies are brought together. Where no impacts were identified, these have been excluded below.

A table showing the summary of all relevant assessments for Waste and Minerals Local Plan ("the Plan"), can be found in Section 8 of the Sustainability Appraisal.

Objective 1: To Avoid negative effects and enhance positive effects on health.

Policy	Short	Medium	Long	Comments	Prob	Dir/Ind	Rev?
RM1	+	+	+	The provision of minerals indirectly improves human health by enabling the continued development of villages, towns and cities. The emphasis on use of existing sites and promotion of sustainable transport modes will concentrate traffic movements around existing facilities. However, these would have been considered when permission was originally granted. Potentially Affected Locations: <u>Urban Areas</u> .	M	I	X

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

Policy	Short	Medium	Long	Comments	Prob	Dir/Ind	Rev?
RM1	+/-	+/-	+/-	The emphasis on use of existing sites and promotion of sustainable transport modes will concentrate traffic moments around existing facilities. This potentially will have a negative impact on the amenity of residents and neighbouring land uses, but will reduce impacts in other areas. Potentially Affected Locations: <u>Minerals Facilities - Areas near</u> .	M	D	X
RM2	•	•	•	Any effect on amenity from the allocation of Aldershaw Tiles would be a consequence of traffic movements which will be unchanged from present. The nearest residence is over 800m from the site, direct effects on residential amenity as a result of extraction is considered unlikely. Restoration of the site is unlikely to involve community benefit owing to it's size.	H	I	✓
RM5	+	+	+	The Agent of Change principle will help manage expectations as to the expected perceived amenity of future occupiers of adjoining developments. The extension of the safeguarded area should also assist in preventing incomparable development. Potentially Affected Locations: <u>Minerals Facilities - Areas near</u> ,	M	D	X

				<u>Ports & Wharves - Areas near.</u>			
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Objective 4: To minimise waste generation and disposal to land.

Policy	Short	Medium	Long	Comments	Prob	Dir/Ind	Rev?
RM0	+	+	+	By reducing the amount of materials being used, the policy should contribute to reducing the amount of future total waste arisings.	H	I	X

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

Policy	Short	Medium	Long	Comments	Prob	Dir/Ind	Rev?
RM0	+	+	+	The policy should make more efficient use of aggregate and promote the use of secondary and recycled aggregate over virgin material.	H	I	X
RM1	+	+	+	The Policy in general contributes positively to the sustainable use of minerals. The policy emphasis on promoting secondary and recycled aggregates should help reduce the need for raw minerals. Likewise, it will also help encourage their use. Continued emphasis on existing minerals importation facilities will also indirectly support their safeguarding. Potentially Affected Locations: <u>Minerals Facilities</u> .	H	D	X
RM2	+	+	?	The support for an additional area of extraction of clay at this site would help enable the continuation of extraction at Aldershaw Tiles. However, the lack of allocation makes the deliverability of the extension more uncertain. If the supported extraction proceeds it would positively contribute to the sustainable use of minerals. Potentially Affected Locations: <u>Aldershaw Tiles</u> .	M	D	X
RM4	+	+	+	The requirement for prior extraction will ensure that all safeguarded minerals are not sterilised by development unless it cannot be extracted practically or feasibly. Potentially Affected Locations: <u>Safeguarded Mineral Resources</u> .	?	D	X
RM5	+	+	+	Increased safeguarding as a result of the Agent of Change principle will help protect areas that are or may be required in the handling of minerals. It should increase the overall level of protection that safeguarded sites receive. Increased safeguarding should also indirectly support neighbouring MLPs by providing increased certainty as to future available railhead and wharf capacity. Potentially Affected Locations: <u>Minerals Facilities - Areas near,</u>	M	D	X

				<u>Ports & Wharves - Areas near.</u>			
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Objective 9: To limit the causes of and adapt to climate change.

Policy	Short	Medium	Long	Comments	Prob	Dir/Ind	Rev?
RM0	+	+	+	The Policy promotes minimisation, and then use of recycled and secondary aggregate. This should reduce overall energy and resource use used in production and transport etc., which should provide a positive effect in relation to addressing climate change.	H	I	X
RM1	+	+	+	Policy supports the provision of recycled aggregates facilities, which will reduce the need for raw materials. Potentially Affected Locations: <u>Sand and Gravel Resource</u> .	H	D	X
RM2	+/ ?	+/?	?	Support for continued production of minerals at this location will help enable continued local provision of clay, which will reduce distance of travel and associated emissions. Potentially Affected Locations: <u>Plan Area</u> .	M	I	X

Objective 10: To protect air quality and reduce air pollution.

Policy	Short	Medium	Long	Comments	Prob	Dir/Ind	Rev?
RM1	+/ -	+/-	+/ -	The emphasis on use of existing sites and promotion of sustainable transport modes will concentrate traffic moments around existing facilities, which should have suitable accesses to the road network. This is likely to help minimise the effect on areas suffering from air pollution. Likewise, the emphasis on sustainable transport methods may also help. On balance, it is assessed that it is likely to have a minor positive effect. Potentially Affected Locations: <u>Minerals Facilities - Areas near</u> , <u>Minerals Facilities - Connecting roads</u> , and <u>areas near connecting roads</u> , <u>Ports & Wharves - Areas near</u> , <u>Ports & Wharves - Connecting roads</u> , and <u>areas near connecting roads</u> , <u>AQMA Designated Areas</u> .	M	I	X

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

Policy	Short	Medium	Long	Comments	Prob	Dir/Ind	Rev?
RM0	+	+	+	By seeking to minimise and make use of secondary and recycled material the policy should help extend the life of local mineral	H	D	X

				resources and encourage of use of recycled and secondary sources. Both of which tend to be local to the county, in turn this should reduce the number of HGVs and the distance they travel.			
RM1	+/-	+/-	+/-	Existing facilities will enable the continued import of material into the Plan Area. However, this will be imported material rather than locally sourced. Existing HGV travel patterns are likely to alter as Lydd Quarry reaches the end of its permitted reserves proportionate to its supply. 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). The policy also encourages use of sustainable transport of minerals and indirectly supports safeguarding of existing facilities by enabling development within sites. Potentially Affected Locations: <u>Minerals Facilities (in and near Plan Area) - Connecting roads, and areas near connecting roads.</u>	M	D	X
RM2	+/?	+/?	?	Support for continued production of minerals at this location will help enable continued provision of clay serving the local area. The site is served by existing tile making facility on site, which compliment each other reducing the need for transport. Potentially Affected Locations: <u>Plan Area.</u>	M	I	X
RM4	+	+	+	Promotion of prior extraction will support local minerals provision. The odds of extraction occurring depend on the extent of safeguarding and location of development. Potentially Affected Locations: <u>Plan Area.</u>	?	D	X

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

Policy	Short	Medium	Long	Comments	Prob	Dir/Ind	Rev?
RM1	+	+	+	The emphasis on use of existing sites should reduce the number of required facilities to be provided elsewhere. A broad number of locations across the plan area that could benefit include the High Weald Area of Outstanding Natural Beauty, South Downs National Park, historic environment and its setting including listed buildings etc, and features of local historic or architectural interest. The policy also seeks to used existing and developed land. Potentially Affected Locations: <u>Plan Area.</u>	M	I	X
RM2	•	•	?	The existing site and area in which additional extraction is proposed is within the High Weald AONB. The policy requires an assessment and appropriate mitigation, if required. The impact is, therefore, likely to be minimal owing to the small levels of extraction. In relation to undesignated historic assets, any area	M	D	X

				identified for extraction may affect some assets. If this occurs, it would be addressed under Policy RD1. A restoration scheme was not submitted with the original proposal. The potential enhancement to the countryside is unknown. Recommended Mitigation: <u>Site Specific Mitigation</u> . Potentially Affected Locations: <u>Aldershaw Tiles</u> .			
RD1	•	•	•	The change in the text relating to historic sites is likely to result in more emphasis being placed on the tests within the NPPF. However, the net effect of this on historic sites has been assessed to be neutral.			

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

Policy	Short	Medium	Long	Comments	Prob	Dir/Ind	Rev?
RM1	-	-	-	The Plans seeks to use marine dredged aggregate to in part meet the needs of the Plan Area. Marine dredging may have negative effects on marine biodiversity and marine habitats where it occurs. 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. Potentially Affected Locations: <u>Licensed & Identified Marine Areas for Aggregate Dredging (Outside of Plan Area)</u> .	M	I	✓
RM2	•/?	•/?	+/?	The policy provides support for extraction in connection with the Aldershaw Tiles operation, subject to a number of caveats. Areas of ancient woodland can be found within the Aldershaw Tiles site. Policy RM2 requires any proposed location to assess and potential impact and follow standing advice regarding standoffs and mitigation etc. In the vicinity of the original area submitted for consideration there are local records of protected and notable species including dormouse, great crested newt and bluebell. It is a fair assumption that, given the character of the area, that this would apply to a wider area. An <u>ecological survey</u> should inform any site selection to establish if protected species are present in and around the extraction area. A <u>restoration scheme</u> was not submitted with the original proposal, but one would be required by the RM2/WMP17 on submission of an application. However, given the limited levels of extraction that would be required to meet the sites needs it is anticipated that any positive benefits are likely to be relatively small scale. Recommended Mitigation: <u>Site Specific Mitigation</u> . Potentially Affected Locations: <u>Aldershaw Tiles</u> .	M	D	✓
RM4	•	•	•	An initial assessment of this policy indicated that the prior extraction policy could be conflict with policy protecting			

				geodiversity (WMP27/RD1). A recommendation was made to include <u>clarification of supporting text</u> to provide guidance as to which policy has priority should there be conflict. It is understood this has been incorporated in the Plan and this criteria has been reassessed as neutral on the basis that the policies in combination should enable the most sustainable decision to be taken when an application is being assessed.			
RD1	•	•/?	•/?	In relation to providing net-gain in biodiversity - as the policy is currently worded, it is likely to have no more impact than the existing requirement to maximise biodiversity. In the medium to long term, if the Government mandates specific amounts of net-gain for development, this may result in more positive outcomes. Potentially Affected Locations: <u>Plan Area</u> .	M	D	X

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

Policy	Short	Medium	Long	Comments	Prob	Dir/Ind	Rev?
RM0	+	+	+	By seeking to minimise and promote secondary and recycled aggregate the policy should help ensure the continued provision of aggregate required for sustainable economic growth. It may also indirectly encourage and support the development of secondary and recycled aggregate business by increasing demand for the material. A reduction in the amount of aggregate used in construction may also affect aggregate producers. However, this is likely to be balanced out by an increase in demand for non-aggregate or aggregate replacement products and solutions. Potentially Affected Locations: <u>Plan Area</u> .	H	D	X
RM1	++	++	++	The continued provision of minerals will help support the construction of housing and infrastructure. Potentially Affected Locations: <u>Plan Area</u> .	H	D	X
RM2	+	+	+	Support for continued production of minerals at this location will help enable continued extraction to provide clay for use in construction. However, by not allocating a specific location it reduces the certainty that it will be delivered. Potentially Affected Locations: <u>Plan Area</u> .	M	D	X
RM4	?	?	?	The extraction of minerals that would otherwise be sterilised will support the provision of minerals for construction demand. The policy may affect the viability of proposed developments, which could affect other policy requirements placed on any sites, for example, prior extraction may reduce the viability of providing affordable housing provision on site. Potentially Affected Locations: <u>Safeguarded Mineral Resources</u> .	?	D	X

RD1	•	•/?	•/?	In the near-term the effect of requiring net-gain in biodiversity has been assessed as neutral on business. However, in the medium to long term, if the Government mandates a specific level of net-gain in biodiversity this may add additional costs and affect the viability of minerals operations , waste facilities and waste businesses, their development and the products and services they provided.	M	D	X
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Objective 17: To provide employment opportunities and develop and maintain a skilled workforce.

Policy	Short	Medium	Long	Comments	Prob	Dir/Ind	Rev?
RM1	+	+	+	The continued support of existing landing and import facilities, particularly in the Rye and Newhaven areas, has the potential to provide skills in the minerals industry in those areas. Potentially Affected Locations: <u>Port of Newhaven</u> , <u>Port of Rye</u> .	M	I	X
RM2	+	+	+	Support for continued production of minerals at this location should help support the existing jobs at Aldershaw Tiles. However, by only supporting additional extraction in principle, there is greater uncertainty than if an allocation was made. Potentially Affected Locations: <u>Aldershaw Tiles</u> .	M	D	X

Annex J: Summary of assessment of spatial effects of Revised Policies*

The table below shows a summary of the spatial / areas which may be affected both positively and negatively by the plan. The + / - indicators and significance are based on the assessments carried out on the plan Policies as shown in the previous Annex. This summary is only intended to provide an indication and should be read in conjunction with the assessments. Unless it is explicitly stated the locations below refer to those locations within the Plan Area only.

Location	Obj1.	Obj2.	Obj3.	Obj4.	Obj5.	Obj6.	Obj7.	Obj8.	Obj9.	Obj10.	Obj11.	Obj12.	Obj13.	Obj14.	Obj15.	Obj16.	Obj17.
Aldershaw Tiles					+/?								•/?	+/?			+
Port of Newhaven																	+
Port of Rye																	+
AQMA Designated Areas										+/							
Licensed & Identified Marine Areas for Aggregate Dredging (Outside of Plan Area)														-			
Minerals Facilities					+												
Minerals Facilities - Areas near		+/			+					+/							
Minerals Facilities - Connecting roads, and areas near connecting roads										+/							
Minerals Facilities (in and near Plan Area) - Connecting roads, and areas near connecting roads											+/						
Plan Area									+/		+/		+	•/?		++	
Ports & Wharves - Areas near		+			+					+/							

Ports & Wharves - Connecting roads, and areas near connecting roads										+/-							
Safeguarded Mineral Resources					+											?	
Sand and Gravel Resource									+								
Urban Areas	+																

*Annex K: Effects Arising from Other Plans and Strategies**

This annex sets out the findings of a review of other plans and strategies relevance to the Revised Policies Document (RPD). It identifies each of those plans and strategies that have either been adopted or are reasonably likely to be adopted, which could potentially give rise to effects in combination with the WMLP. The assessment below of the likely cumulative impacts of arising from the RPD and other plans acting in combination has been undertaken using the framework set out in this SA as well as the following additional topics were identified:

- Primary sources of direction / policy;
- Land use of identified sites;
- Any other topics not listed above.

When undertaking the assessment any identified effects were assessed as to whether the RPD complimented, mitigated or conflict with the other plans identified below. This assessment used the following additional symbols:

Symbol	Description
•	Neutral / passive interaction
&	Plans in combination complement each other for greater effect
!	Conflict between plans
~	Plans in combination mitigate effect
?	Unknown interaction
N/A	Not relevant

Change Log

SA Version	Note
Regulation 18 Consultation Draft	<ul style="list-style-type: none"> Initial assessment.
Regulation 19 Consultation Draft	<ul style="list-style-type: none"> Document list updated. Assessment updated based on revised policy assessments.

Relevant Documents

- [Shoreham Harbour Joint Area Action Plan](#)
- [Brighton & Hove City Plan Part One](#)
- [Brighton & Hove City Plan Part Two \(Draft\)](#)
- [Eastbourne Core Strategy](#)
- [Eastbourne Town Centre Local Plan](#)
- [Eastbourne Employment Land Local Plan](#)
- [Eastbourne's Direction of Travel: Issues and Options for the Eastbourne Local Plan](#)
- [East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan](#)
- [East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan](#)
- [Hastings Development Management Plan](#)
- [Hastings Planning Strategy, The](#)
- [Hastings Local Plan Consultation Draft \(Regulation 18\)](#)
- [Kent Minerals and Waste Local Plan 2013-30](#)
- [Lewes District Local Plan: Part 1 - Joint Core Strategy 2010-2030](#)
- [Lewes Local Plan Part 2: Site allocations and development management policies](#)
- [Newhaven Port Masterplan](#)
- [Rother District Local Plan](#)
- [Rother Local Plan: Core Strategy](#)
- [Rother Local Plan: Development and Site Allocations \(DASA\)](#)
- [South Downs Local Plan](#)
- [Wealden District Core Strategy Local Plan \(2013 - 2027\)](#)
- [Wealden Local Plan \(Direction of Travel Consultation\)](#)
- [West Sussex Joint Minerals Local Plan](#)

Assessment

Framework Objectives

1. To Avoid negative effects and enhance positive effects on health.	&	+	The RPD makes provision for aggregate that is required for construction, without which the other Local Plans may not be able to deliver the planned development. As this planned development will provide homes, employment space and other services, which will have indirect positive effects on health.
2. To protect the amenity of residents and neighbouring	•	•	As the RPD seeks to use existing minerals facilities the effects on neighbouring amenity will be limited to certain areas. However,

land uses.			as these are existing facilities, the overall effect of the plan is neutral. The RPD is therefore, unlikely to affect existing or development proposed in other plans.
3. To improve equality and access to sustainable waste management.	N/A	N/A	N/A (See Assessment Note 1)
4. To minimise waste generation and disposal to land.	&	+	By promoting reducing the amount of materials being used in the Plan and future Local Plans prepared by District and Borough Councils, the Plan should help contribute to reducing the amount of future total waste arisings. This should also compliment existing plans.
5. To ensure the sustainable use of local mineral resources.	&	+	<p>Although the Plan is the only document to focus on minerals, the other Local Plans within the Plan Area have all taken into account the National Planning Policy Framework. In the framework it states that using natural resources, (which includes mineral) is part of sustainable development. Consequently this is reflected in these plans through overarching policies such as those related to sustainable development, or indirectly through where development is located and the density of development. One example is Policy D1: Sustainable Development of the Eastbourne Core Strategy. It is considered that the WMLP other plans complement each other in this respect.</p> <p>The RPD seeks to minimise the amount of aggregate being used in development, this is to be achieved through the designs put forward by developers, and by working with other LPAs to promote aggregate use minimisation through their local Plans. This compliments existing and future local plans prepared by the district and borough councils, particularly in relation to sustainable design.</p> <p>The RPD seeks to use of marine dredged aggregate. This directly interacts with the South Coast Marine Plan. However, as the minerals facilities are existing facilities and the areas to be dredged are already identified. This has been assessed to be a positive interaction between the two plans. The RPD also seeks to continue to import land-won aggregate from areas outside of the Plan Area. This is most likely to affect adjacent Minerals Planning Authorities and their Plans.</p> <p>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. On the basis of this assumption it is considered that the MMO, neighbouring MPA Minerals Plans and the RPD complement each other by supplying minerals where they are required.</p>

			<p>It is 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.</p> <p>Please note, the Minerals Plans (including the Marine Plans) identified above account for most (about 95%) the imported aggregate. Some is sourced from other areas, but to be proportionate this SA has only identified key plans for this section. See the East Sussex Local Aggregates Assessment 2018/19 for more information.</p>
6. To maintain and improve water quality.	N/A	N/A	N/A (See Assessment Note 1)
7. To seek the protection of and sustainable use of water resources.	N/A	N/A	N/A (See Assessment Note 1)
8. To reduce risk and impact of flooding.	N/A	N/A	N/A (See Assessment Note 1)
9. To limit the causes of and adapt to climate change.	&	+	Whilst the RPD may compliment the other plans in respect of this shared objective, there is no direct interaction on this objective.
10. To protect air quality and reduce air pollution.	&	+/-	<p>It was identified in the assessment the effect the RPD might have on air quality and air pollution is likely to be an indirect effect related to the distribution of traffic movements. In combination with the other Plans the effects are likely to be similar to objective 11 below. It is noteworthy that whilst the road connections to the Ports in East Sussex are not ideal, they do have accesses either onto or close to the A-Road network.</p> <p>Furthermore, a new Newhaven Port Access Road is currently under construction which should provide a more suitable access to the East Quay area of the Port.</p> <p>No other interactions between the RPD and the other plan in regard to air pollution have been identified.</p>
11. To reduce adverse impacts of transporting waste and minerals on the environment.	&	+/-	<p>The most significant likely effect of the RPD relates to the change in traffic patterns as a result of Policy RM1 which, over the lifetime of the Plan, reduces the number of HGVs originating from Lydd Quarry, whilst increasing those from existing permitted minerals sites, ports and wharves, in and near the Plan Area. The effect of this is most likely to be noted near the roads accessing those minerals sites, ports and wharves and the locations they are serving, such as construction sites. However, it is important to note that these increased traffic levels are from permitted sites and these increased traffic levels were a consideration when they</p>

			<p>were permitted.</p> <p>The Local Plans also tend to focus their development around the larger settlements along the coast and the inland towns. Consequently the, plans in combination are likely to increase the total traffic levels in and around the ports of Shoreham, Newhaven and Rye in particular. Other areas are likely to experience no effect or a benefit. Any effects experienced are likely to be localised to specific areas.</p>
12. To conserve and enhance important soil functions and types.	N/A	N/A	N/A (See Assessment Note 1)
13. To protect, conserve and enhance East Sussex and Brighton & Hove's countryside and historic and built environment.	N/A	N/A	The effects of the RPD on the historic and built environment are predominantly site based. No interactions with other plans have been identified
14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	•	•	There is mostly little interaction between the RPD and other local plans on this topic. The exception to this is where the RPD seeks to use marine dredged aggregate, which interacts with the South Coast Marine Plan. However, as the minerals facilities are existing facilities and the areas to be dredged are already identified, the plans effect on biodiversity was assessed when those plans were prepared. The RPD, in its interaction with the Marine Plan neither improves nor diminishes the assessed effects on biodiversity / geodiversity.
15. To increase energy efficiency and the proportion of energy generated from renewable sources.	N/A	N/A	N/A (See Assessment Note 1)
16. To contribute to the growth of a sustainable and diversified economy	&	+	The RPD will support the proposals set out in the other plans identified above through the provision of minerals. This will indirectly support the economy through the provision of employment space and services. It will also indirectly support the construction sector once the planned development is permitted and being constructed.
17. To provide employment opportunities and develop and maintain a skilled workforce.	&	+	The RPD will support the proposals set out in the other plans identified above through the provision of minerals. This will indirectly support employment in the construction sector and provision of employment space and services for future jobs.

Additional Topics

A. Primary sources of direction / policy	&	+	All Local Plans, broadly, are based on the same legal framework and national policies and guidance. Whilst the emphasis of Local Plans may vary, they should, be setting strategies within the same framework, and consequently any the likelihood of conflict between them should be minimised. The Newhaven Port Masterplan is not a Local Plan, but the priorities of the Port Authority and the Local Plans appear to accord with each other.
B. land use of identified sites	&	+	On the whole, no conflicts have been identified between the RPD and the other plans in respect of any specific areas of land identified for specific land-uses. There are some instances where the RPD does safeguard area, such as parts of Rye Harbour, which are allocated (for example Policy RHA2: Harbour Road Employment Area of the Rother Development and Sites Allocations Plan). However, these policies have been written so as to be in conformity with one-another and this enables the flexible / appropriate use of those areas of land. They are therefore considered to complement each other.
C. Any other topics not listed above	N/A	N/A	No other topics of have been identified where the RPD in combination with the plans listed above are likely to have significant effects.

Assessment Note 1: The SA did not identify any likely significant effects as a result of the RPD in relation to this objective. No assessment of interaction is therefore applicable.

Annex L: Glossary of Recommended Mitigation

Archaeological Field Assessment

A survey undertaken by a qualified person, in consultation with the relevant authorities, (e.g. Historic England / the County Archaeologist,) to identify the archaeological potential of an area and make recommendations as to how best to approach the development. Any recommendations made should then be carried out to ensure that any on site archaeology is handled to the satisfaction of the relevant authorities.

Avoidance

In certain circumstances it may be possible to develop in such a way that it either totally or partially avoids a constraint. This should be the first approach taken before other mitigation is considered.

Clarification of Supporting Text

The policy assessment may identify ambiguity or conflict between policies. Where this occurs it may be appropriate to clarify this in the policies supporting text to resolve these issues. Specific recommendations can be found in the policy assessment.

Compensation

Provision of an alternative, either on or off site, to the feature or habitat that is being destroyed.

Ecological Survey

A survey to identify evidence protected species and any habitats they could inhabit. This may lead to further surveys or recommendations as to how development can proceed whilst also meeting the relevant legal requirements. These surveys can only be undertaken at specific times of year.

Landscaped Bunds

Raised grassed bunds, usually located at the edge of site to provide visual screening and in some circumstances noise attenuation.

Project Level Mitigation Strategy

This SA only provides high level recommendations regarding mitigation. Where the situation is complex a project level assessment is recommended. This assessment should identify the relevant issues and having sought expert advice detail an appropriate mitigation strategy. This strategy may incorporate other mitigation recommended within this SA.

Restoration Scheme

An agreed scheme for how a quarry will be restored during and after it is being quarried.

Site Specific Mitigation

Policies making allocations should seek to enhance the positive effects whilst minimising the negative effects. With each site being subject to different constraints and opportunities this mitigation is a signpost that all the mitigation recommended as part of the site assessments should be addressed. This may come in the form of site specific policies, development management policies, site profiles and their supporting information of a combination of one or more of the above.

Stand-off Distance

The effects of some developments on neighbouring uses can be mitigated by the use of a stand-off distance between the two uses. This land which acts as a buffer may be used for less disturbing activities for example landscaping or SuDS. The stand-off distance will vary depending on the proposed use.

*Annex M: List of previous sustainability appraisals of the Waste and Minerals Local Plan**

- East Sussex and Brighton & Hove Waste and Minerals Core Strategy and Minerals Site Development Plan Document Sustainability Appraisal Scoping Report, March 2007.
- East Sussex, South Downs and Brighton & Hove Waste and Minerals Development Framework Sustainability Appraisal Report, February 2013 (the 2013 SA Report).
- East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan Post Adoption Statement, 2013.
- East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan: Sustainability Appraisal of the Waste and Minerals Sites Plan Pre-Scoping Report, July 2013.
- Sustainability Appraisal of the East Sussex, South Downs and Brighton & Hove Draft Waste and Minerals Sites Plan, June 2014.
- Sustainability Appraisal of the East Sussex, South Downs and Brighton & Hove Pre-Submission Waste and Minerals Sites Plan (August 2015, incorporating addendums February 2016 and August 2016).
- East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan Post Adoption Statement, 2017.
- East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan Review: Sustainability Appraisal Scoping Report, March 2018.
- East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan Review: Sustainability Appraisal, March 2020.

Planning Policy & Development Management

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Communities, Economy & Transport
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01273 481846

Planning Directorate

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Planning Policy

Brighton & Hove City Council
Hove Town Hall
Norton Road
Hove
BN3 2BQ

01273 292505

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

Pre-Submission Document

Habitat Regulations Assessment

East Sussex County Council

June 2021

Quality information

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Revision History

Revision	Revision date	Details	Authorized	Name	Position
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1. Introduction

Background to Project

- 1.1 AECOM was appointed by East Sussex County Council to assist in undertaking Habitat Regulation Assessment (HRA) of Review of the East Sussex, South Downs National Park and Brighton & Hove Waste and Minerals Local Plan (hereafter referred to as the Review Plan Document or RPD). The objectives of the assessment are to:
- Identify any aspects of the Plan Review that would cause a likely significant effect on any European sites, otherwise known as European Sites, which include Special Areas of Conservation (SACs), candidate SACs (cSACs), Special Protection Areas (SPAs) and potential SPAs (pSPAs) and as a matter of Government policy, Ramsar sites, both in isolation and in combination with other plans and projects; and
 - Determine whether appropriate assessment (AA) would be required in order to identify potential adverse effects on the integrity of any European sites.

Legislation

- 1.2 The need for HRA is set out within the Conservation of Habitats & Species Regulations 2017 (as amended) and concerns the protection of European sites. European sites (also called the National Site Network) can be defined as actual or proposed/candidate Special Areas of Conservation (SAC) or Special Protection Areas (SPA). It is also Government policy for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to SACs and SPAs.
- 1.3 The HRA process applies the precautionary principle to protected areas. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

Box 1. The legislative basis for appropriate assessment

Conservation of Habitats and Species Regulations 2017 (as amended)

The Regulations state that:

“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that site’s conservation objectives... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site.”

- 1.4 Over the years the phrase ‘Habitats Regulations Assessment’ has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations 2017 (as amended) from screening through to IROPI. This has arisen in order to distinguish the process from the individual stage described in the law as an ‘appropriate assessment’. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

2. Methodology

Introduction

- 2.1 This section sets out our approach and methodology for undertaking the HRA. Habitats Regulations Assessment itself operates independently from the Planning Policy system, being a legal requirement of a discrete Statutory Instrument.

A proportionate assessment

- 2.2 Project-related HRA often requires bespoke survey work and novel data generation in order to accurately determine the significance of adverse effects. In other words, to look beyond the risk of an effect to a justified prediction of the actual likely effect and to the development of avoidance or mitigation measures.
- 2.3 However, the draft MHCLG guidance¹ makes it clear that when implementing HRA of land-use plans, the HRA should be undertaken at a level of detail that is appropriate and proportional to the level of detail provided within the plan itself:
- 2.4 *'The comprehensiveness of the [appropriate] assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. An AA need not be done in any more detail, or using more resources, than is useful for its purpose. It would be inappropriate and impracticable to assess the effects [of a strategic land use plan] in the degree of detail that would normally be required for the Environmental Impact Assessment (EIA) of a project.'*
- 2.5 In other words, there is a tacit acceptance that appropriate assessment can be tiered and that all impacts are not necessarily appropriate for consideration to the same degree of detail at all tiers (Box 2).

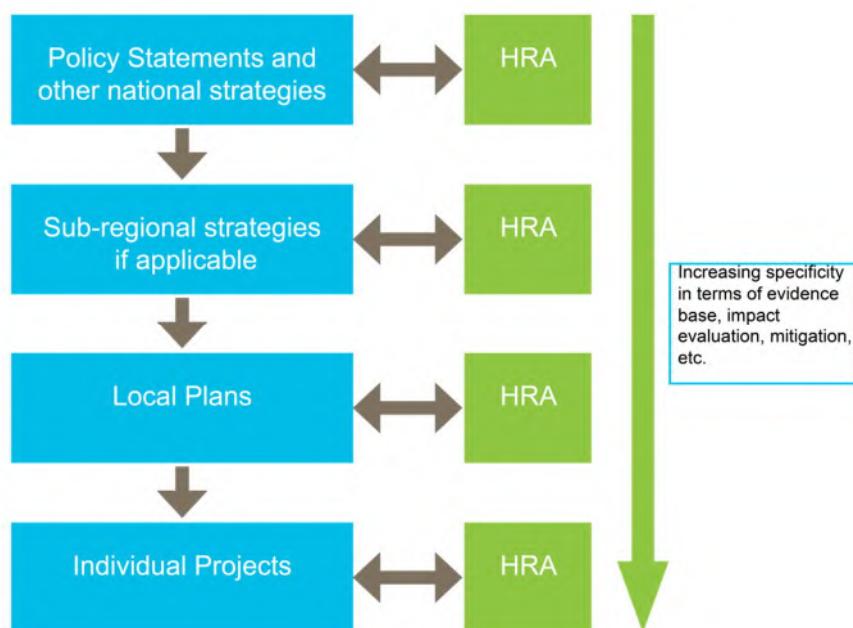


Figure 1. Tiering in HRA of land use plans.

- 2.6 For a land use plan, the level of detail concerning the developments that will be delivered is usually insufficient to make a highly detailed assessment of the significance of effects. For example, precise and full determination of the impacts and significant effects of a new settlement will require extensive details concerning its design, including the layout of greenspace and type of development to be delivered in particular locations, yet these data will not be finalised until subsequent stages.

¹ CLG. (2006) Planning for the Protection of European Sites, Consultation Paper

- 2.7 On these occasions the advice of Advocate-General Kokott² to the European Court of Justice is worth considering. She commented that: *"It would ...hardly be proper to require a greater level of detail in preceding plans [rather than planning applications] or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure"* [emphasis added].

The process of HRA

- 2.8 The need for Appropriate Assessment is set out within the Conservation of Habitats and Species Regulations 2017 (as amended).
- 2.9 The Regulations apply the precautionary principle to European sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects with predicted adverse impacts on European sites may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.
- 2.10 Figure 2 below outlines the stages of HRA according to current Ministry of Housing, Communities and Local Government guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the Plan until no significant adverse effects remain.

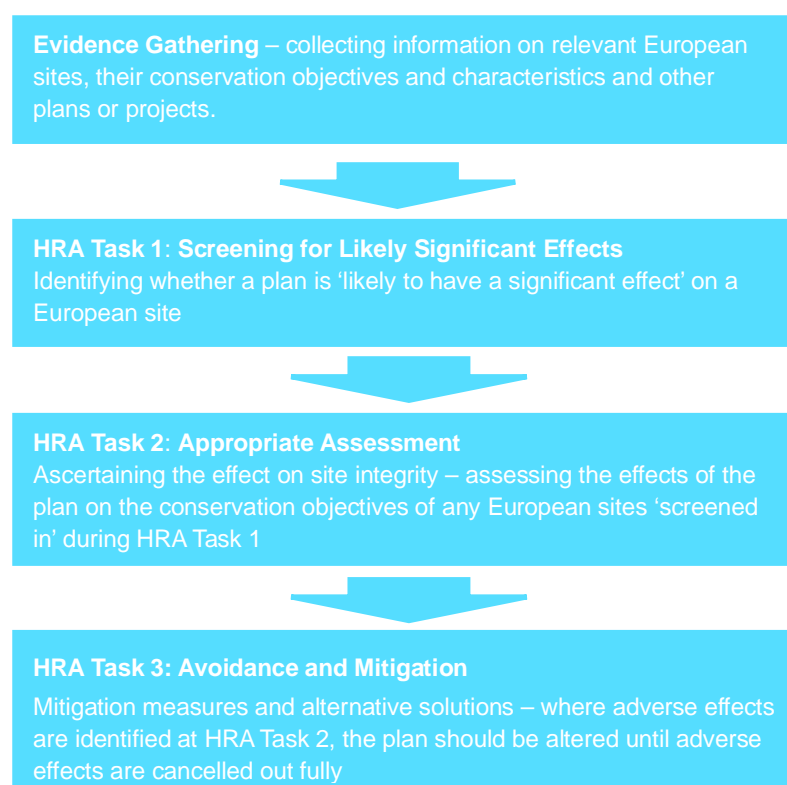


Figure 2: Four Stage Approach to Habitats Regulations Assessment. Source GOV.UK, 2019.

HRA Task 1 – Likely Significant Effects (LSE)

- 2.11 Following evidence gathering, the first stage of any Habitats Regulations Assessment is a Likely

² Opinion of Advocate-General Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland, paragraph 49.
<http://curia.europa.eu/juris/document/document.jsf?docid=58359&doclang=EN>

Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

"Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"

- 2.12 The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites. This stage is undertaken in Chapter 4 of this report and in Appendix B.

HRA Task 2 – Appropriate Assessment (AA)

- 2.13 Where it is determined that a conclusion of 'no likely significant effect' cannot be drawn, the analysis has proceeded to the next stage of HRA known as Appropriate Assessment. Case law has clarified that 'appropriate assessment' is not a technical term. In other words, there are no particular technical analyses, or level of technical analysis, that are classified by law as belonging to appropriate assessment rather than determination of likely significant effects.
- 2.14 During July 2019 the Ministry of Housing, Communities and Local Government published guidance for Appropriate assessment³. Paragraph: 001 Reference ID: 65-001-20190722m explains: *'Where the potential for likely significant effects cannot be excluded, a competent authority must make an appropriate assessment of the implications of the plan or project for that site, in view of the site's conservation objectives. The competent authority may agree to the plan or project only after having ruled out adverse effects on the integrity of the habitats site. Where an adverse effect on the site's integrity cannot be ruled out, and where there are no alternative solutions, the plan or project can only proceed if there are imperative reasons of over-riding public interest and if the necessary compensatory measures can be secured'*.
- 2.15 As this analysis follows on from the screening process, there is a clear implication that the analysis will be more detailed than undertaken at the Screening stage and one of the key considerations during appropriate assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the appropriate assessment would take any policies or allocations that could not be dismissed following the high-level Screening analysis and analyse the potential for an effect in more detail, with a view to concluding whether there would be an adverse effect on integrity (in other words, disruption of the coherent structure and function of the European site(s)).
- 2.16 A decision by the European Court of Justice⁴ concluded that measures intended to avoid or reduce the harmful effects of a proposed project on a European site may no longer be taken into account by competent authorities at the Likely Significant Effects or 'screening' stage of HRA. That ruling has been considered in producing this HRA.
- 2.17 Also, in 2018 the Holohan ruling⁵ was handed down by the European Court of Justice. Among other provisions paragraph 39 of the ruling states that *'As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, ... typical habitats or species must be included in the appropriate assessment, if they are necessary to the conservation of the habitat types and species listed for the protected area'* [emphasis added]. This has been taken into account in the HRA process.

HRA Task 3 – Avoidance and Mitigation

- 2.18 Where necessary, measures are recommended for incorporation into the Plan in order to avoid or mitigate adverse effects on European sites. There is considerable precedent concerning the level of detail that a Local Plan document needs to contain regarding mitigation for recreational impacts on European sites. The implication of this precedent is that it is not necessary for all measures that will be deployed to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.

³ <https://www.gov.uk/guidance/appropriate-assessment#what-are-the-implications-of-the-people-over-wind-judgment-for-habitats-regulations-assessments> [Accessed: 23/03/2020].

⁴ People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

⁵ Case C-461/17

- 2.19 In evaluating significance, AECOM has relied on professional judgement as well as the results of previous stakeholder consultation regarding development impacts on the European sites considered within this assessment.
- 2.20 When discussing 'mitigation' for a Local Plan document, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves since the Local Plan document is a high-level policy document.

Physical Scope

- 2.21 The physical scope of the assessment (i.e. the range of European sites to be considered) is based on a combination of tracing impact pathways and using distances derived from various studies.
- 2.22 The European sites of relevance to this HRA are shown in Table 1. Full details of reasons for their designation (in accordance with the Holohan ruling), conservation objectives and key vulnerabilities are presented in Appendix A.

Table 1. European sites of relevance to HRA of the Plan Area⁶

European site	Site summary	Proximity to the Plan area?
Ashdown Forest SAC and SPA	European Site supported heathland of international importance and susceptible to reduced air quality, reduced water quality and flows, disturbance and predation.	Within Plan Area
Castle Hill SAC	Susceptible to reduced air quality.	Within Plan Area
Dungeness SAC, Dungeness, Romney Marsh and Rye Bay SPA, and Dungeness, Romney Marsh and Rye Bay Ramsar	Susceptible to reduced air quality, reduced water quality and flows, disturbance and predation, reduced availability of off-site areas for use by bird species, and coastal squeeze.	Within Plan Area
Hastings Cliffs SAC	Susceptible to reduced air quality and coastal squeeze.	Within Plan Area
Lewes Downs SAC	Susceptible to reduced air quality.	Within Plan Area
Pevensey Levels SAC and Ramsar	Susceptible to reduced air quality, reduced water quality and flows, and coastal squeeze.	Within Plan Area

In Combination Scope

- 2.23 It is a requirement of the Conservation of Habitats and Species Regulations 2017 (as amended) that the impacts and effects of any plan being assessed are not considered in isolation but 'in combination' with other plans and projects that may also affect the European sites(s) in question.
- 2.24 In practice, in combination assessment is of greatest importance when the plan would otherwise be screened out because the individual contribution is inconsequential. The principal other plans and projects of relevance regarding in combination effects are:
- Housing and employment allocations to be delivered under Local Plans for Local Authorities within East Sussex, the South Downs National Park, Brighton & Hove and immediately neighbouring areas;
 - East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan (adopted 2013);
 - West Sussex and South Downs Minerals Local Plan (including soft sand review);
 - West Sussex and South Downs Waste Local Plan (adopted 2014);
 - East Sussex Local Transport Plan 3 (2011-2026);
 - South East River Basin Management Plan (2015);

⁶ The Plan area consists of East Sussex county (including those parts of East Sussex within the South Downs National Park) as well as the City of Brighton & Hove

- Kent Waste and Minerals Local Plan (2013-30);
- South Foreland to Beachy Head Shoreline Management Plan (2006);
- Beachy Head to Selsey Bill Shoreline Management Plan (2006);
- High Weald AONB Management Plan (2019–2024); and
- South Downs National Park Management Plan (2014-2029).

2.25 These plans include those that are considered likely to influence:

- surface water or groundwater dynamics or quality within the catchment of Ashdown Forest SAC/SPA, Dungeness SAC, Dungeness, Romney Marsh and Rye Bay SPA/Ramsar site, or Pevensey Levels SAC and Ramsar site;
- traffic along roads passing through or close to European sites within the plan area (all are potentially susceptible to reduced air quality);
- bird disturbance at Dungeness, Romney Marsh and Rye Bays SPA/Ramsar site and Ashdown Forest SPA;
- coastal dynamics at Dungeness SAC, Dungeness, Romney Marsh and Rye Bay SPA/Ramsar site, Hastings Cliffs SAC or Pevensey Levels SAC and Ramsar site; and
- the overall increase in population and thus recreational pressure on European sites in and around the plan area.

2.26 The Authorities propose that the Plan Area should increasingly rely on sea, rail and road imports from marine and other land won sources and recycled aggregate. To support this, the existing minerals infrastructure, particularly those wharves and ports required to land marine aggregate, will be safeguarded. An existing requirement for the prior extraction of minerals where development occurs on safeguarded minerals resources, mostly located within the National Park, will also be strengthened. An allocation for a small (0.2ha) extension to an existing clay quarry near Sedlescombe is proposed, but no new sites for aggregate extraction are identified.

2.27 At the Call for Sites stage the operator submitted a proposed extension to the quarry at Lydd. The area surrounding the quarry is constrained by both National and international environmental designations, which also cover or are adjacent to all the sand and gravel resource in this part of the County. Following consideration of advice from Natural England and the availability of alternative materials, the Authorities are not proposing to allocate an extension to Lydd Quarry.

2.28 A number of minor amendments to improve policy, but not to change the existing strategy or thrust of the WMLP, are being proposed, including: (i) clarifying the wording of a small number of policies; (ii) adding reference to net-gain in biodiversity to the Environment and Environmental Enhancement policy; and (iv) updating the protected landscapes policy to include specific references to the High Weald AONB. Full details are contained within the plan.

3. Background to impact pathways

Introduction

3.1 When carrying out HRA it is important to determine the various ways in which land use plans can affect internationally designated sites. This means studying the pathways associated with development that can be connected to internationally designated sites, in some cases many kilometres distant. Briefly defined, pathways are routes where a change in activity associated with a plan document or development can lead to an effect upon an internationally designated site. Given this plan will be delivering minerals development, the following pathways have been identified as requiring further analysis in this HRA:

- Direct landtake;
- Disturbance;
- Air quality;
- Water quality and water resources; and
- Coastal squeeze.

Direct Landtake

3.2 European sites and their supporting ('functionally linked') habitat are vulnerable to direct loss of land to development. Loss of habitat is likely to have adverse impacts on populations of SPA and Ramsar site bird species, which depend on sufficiently large areas of suitable foraging, roosting and nesting habitat. A reduction in the area of suitable habitat also increases the vulnerability of bird populations to other threats and pressures (e.g. fires, changes in habitat structure).

3.3 Direct landtake is of particular concern regarding functionally linked habitat to European sites. Species for which European sites may be designated will often also use habitat outside of the boundary of the European site. As such, this habitat may be important to the long-term success of the European site's population of the species in question. Therefore, where developments are proposed near to European sites, it is necessary to assess the suitability of the site of the proposed development and adjacent affected land to provide functionally linked habitat to the European site with respect to species for which the European site is designated.

Disturbance

3.4 As a general activity, mineral extraction and quarrying activities can have significant disturbance impacts on birds. Disturbance can take many forms, including noise (e.g. from blasting/rock crushing (where undertaken), vehicle movements), visual (e.g. from vehicle movements) and vibration (e.g. from blasting, where undertaken).

3.5 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and the time they spend responding to disturbance is time that is not spent feeding⁷. Disturbance therefore risks increasing energetic output while reducing energetic input, which can adversely affect the 'condition' and ultimately survival of the birds. In addition, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they have to sustain a greater number of birds⁸. Moreover, the more time a breeding bird spends disturbed from its nest, the more its eggs are likely to cool and the more vulnerable they are to predators.

3.6 Human activity can affect birds either directly (e.g. through causing them to flee, incurring an energetic cost) or indirectly (e.g. through damaging their habitat). This can lead to behavioural changes (e.g. alterations in feeding behaviour, avoidance of certain areas etc.) and physiological changes (e.g. an

⁷ Riddington, R. *et al.* 1996. The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279

⁸ Gill, J.A., Sutherland, W.J. & Norris, K. 1998. The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* 12: 67-72

- increase in heart rate) that, although less noticeable, may ultimately result in major population-level effects by altering the balance between immigration/birth and emigration/death⁹.
- 3.7 Disturbing activities are on a continuum. The most disturbing activities are likely to be those that involve irregular, infrequent, unpredictable loud noise events, movement or vibration of long duration. Birds are least likely to be disturbed by activities that involve regular, frequent, predictable, quiet patterns of sound or movement or minimal vibration. The further any activity is from the birds, the less likely it is to result in disturbance.
- 3.8 The factors that influence a species' response to a disturbance are numerous, but the three key factors are species sensitivity, proximity of disturbance sources and timing/duration of the potentially disturbing activity. The distance at which a species takes flight when approached by a disturbing stimulus is known as the 'tolerance distance' (also called the 'escape flight distance') and differs between species to the same stimulus and within a species to different stimuli.
- 3.9 There is usually no need for blasting at sand and gravel extraction sites¹⁰ but only at rock quarries. As such, the noisiest typical activities associated with minerals extraction in East Sussex (if any sites were allocated) would likely be noisy outdoor machinery and conveyors, which at their loudest are likely to produce noise levels below 100dB (A) at 1m from source. Noise in atmosphere attenuates by 6dB for every doubling in distance from source. Therefore, even these noisiest activities are likely to result in noise levels below 70 dB at c. 100m from source. This is relevant because research (primarily conducted on waterfowl but broadly transferable to other bird species) indicates that birds typically exhibit a flight response at noise levels exceeding 84dB, while at levels below 55 dB there is no effect.¹¹ These therefore define the two extremes. It is also generally advised that an activity will not have disturbance effects on birds if the maximum noise level (at the bird) is below 70dB¹².
- 3.10 In addition to noise, there is also the possibility of visual disturbance and some species of bird are understood to be sensitive to visual stimuli at considerable distances. For example, the impacts of disturbance generated from anthropogenic activities within and around estuaries have been identified as a potential issue for waterfowl for several years. The impacts listed above tend to operate within a zone of influence in addition to wider implications through in-direct effects. The extent of the zone of influence will depend largely on the type of activity, existing bird habituation levels, scale of stimuli and abiotic factors.
- 3.11 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and the time they spend responding to disturbance is time that is not spent feeding¹³. Disturbance therefore risks increasing energetic output while reducing energetic input, which can adversely affect the 'condition' and ultimately survival of the birds. In addition, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they have to sustain a greater number of birds¹⁴.

Breeding birds

- 3.12 Specifically with regard to birds on the nest, the more time a breeding bird spends disturbed from its nest, the more its eggs are likely to cool and the more vulnerable they, or any nestlings, are to predators.

Wintering birds

- 3.13 The potential for disturbance may be less in winter than in summer, in that there are often a smaller number of recreational users. In addition, the consequences of disturbance at a population level may be reduced because birds are not breeding. However, winter activity can still cause important disturbance, especially as birds are particularly vulnerable at this time of year due to food shortages, such that disturbance which results in abandonment of suitable feeding areas through disturbance can have severe consequences. Several empirical studies have, through correlative analysis, demonstrated that out-of-season (October-March) recreational activity can result in quantifiable disturbance:

⁹ Riley, J. (2003) Review of Recreational Disturbance Research on Selected Wildlife in Scotland. Scottish Natural Heritage.

¹⁰ <https://www.gov.scot/publications/blasting-surface-mineral/>

¹¹ Cutts N. & Allan J. (1999) Avifaunal Disturbance Assessment. Flood Defence Works: Saltend. Report to Environment Agency.

¹² Cutts, N., Phelps, A. & Burdon, D. (2009) Construction and waterfowl: Defining Sensitivity, Response, Impacts and Guidance. Report to Humber INCA, Institute of Estuarine and Coastal Studies, University of Hull.

¹³ Riddington, R. *et al.* 1996. The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279

¹⁴ Gill, J.A., Sutherland, W.J. & Norris, K. 1998. The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* 12: 67-72

- 3.14 Human activity can affect birds either directly (e.g. through causing them to flee) or indirectly (e.g. through damaging their habitat). The most obvious direct effect is that of immediate mortality such as death by shooting, but human activity can also lead to behavioural changes (e.g. alterations in feeding behaviour, avoidance of certain areas etc.) and physiological changes (e.g. an increase in heart rate) that, although less noticeable, may ultimately result in major population-level effects by altering the balance between immigration/birth and emigration/death.
- 3.15 The degree of impact that varying levels of noise will have on different species of bird is poorly understood except that a number of studies have found that an increase in traffic levels on roads does lead to a reduction in the bird abundance within adjacent hedgerows - Reijnen et al (1995) examined the distribution of 43 passerine species (i.e. 'songbirds'), of which 60% had a lower density closer to the roadside than further away. By controlling vehicle usage they also found that the density generally was lower along busier roads than quieter roads.
- 3.16 Activity will often result in a flight response (flying, diving, swimming or running) from the animal that is being disturbed. This carries an energetic cost that requires a greater food intake. Relatively little detailed research has been conducted concerning the energetic cost to wildlife of disturbance, but such evidence as exists indicates a significant negative effect.
- 3.17 Disturbing activities are on a continuum. The most disturbing activities are likely to be those that involve irregular, infrequent, unpredictable loud noise events, movement or vibration of long duration. Birds are least likely to be disturbed by activities that involve regular, frequent, predictable, quiet patterns of sound or movement or minimal vibration. The further any activity is from the birds, the less likely it is to result in disturbance.
- 3.18 The factors that influence a species response to a disturbance are numerous, but the three key factors are species sensitivity, proximity of disturbance sources and timing/duration of the potentially disturbing activity.
- 3.19 European sites in the Plan Area that have been designated at least in part for their bird interest are:
- Dungeness, Romney Marsh and Rye Bay SPA, and Dungeness, Romney Marsh and Rye Bay Ramsar site; and
 - Ashdown Forest SPA.
- 3.20 For the purposes of screening, the precautionary distance of 1km has been used as a basis on which to screen Waste and Minerals development in or out of consideration with regard to the potential for disturbance (i.e. noise and visual) impacts. In reality, this is likely to be very precautionary even for the noisiest waste processing operations (e.g. aggregates recycling) but is consistent with the approach to the HRA of the original Waste and Minerals Plan.

Air Quality

- 3.21 Mineral extraction, quarrying activities and waste development have the potential for air quality impacts on European sites, both by increasing levels of pollutants (e.g. through increased vehicle use) and through the spread of dust.

Nitrogen deposition

- 3.22 Other than dust, the main pollutants of concern for European sites are oxides of nitrogen (NO_x), ammonia (NH₃) and sulphur dioxide (SO₂). Ammonia can be directly toxic to vegetation, and research suggests that this may also be true for NO_x at very high concentrations. More significantly, greater NO_x or ammonia concentrations within the atmosphere lead to greater rates of nitrogen deposition to vegetation and soils. An increase in the deposition of nitrogen from the atmosphere is generally regarded to increase soil fertility, which can have a serious deleterious effect on the quality of semi-natural, nitrogen-limited terrestrial habitats. Further information on the sources and effects of air pollutants is provided in Table 3.

Table 2. Main sources and effects of air pollutants on habitats and species.

Pollutant	Source	Effects on habitats and species
Acid deposition	SO ₂ , NO _x and ammonia all contribute to acid deposition. Although future trends in SO ₂ and NO _x emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline, it is possible that increased ammonia emissions may cancel out any gains produced by reduced SO ₂ and NO _x levels.	Can affect habitats and species through both wet (acid rain) and dry deposition. Some sites will be more at risk than others depending on soil type, bed rock geology, weathering rate and buffering capacity.
Ammonia (NH ₃)	Ammonia is released following decomposition and volatilisation of animal wastes and from industrial processes and vehicle exhausts. It is a naturally occurring trace gas, but levels have increased considerably with the expansion in agricultural livestock numbers. Ammonia reacts with acid pollutants such as the products of SO ₂ and NO _x emissions to produce fine ammonium (NH ₄ ⁺) - containing aerosol which may be transferred much longer distances (and can therefore be a significant trans-boundary issue).	Adverse effects can be through direct toxicity but are particularly as a result of nitrogen deposition leading to eutrophication. As emissions mostly occur at ground level in the rural environment and NH ₃ is deposited rapidly, some of the most acute problems of NH ₃ deposition are for small relict nature reserves located in intensive agricultural landscapes.
Nitrogen oxides (NO _x)	Nitrogen oxides are mostly produced in combustion processes. About one quarter of the UK's emissions are from power stations, one half from motor vehicles, and the rest from other industrial and domestic combustion processes.	Deposition of nitrogen compounds (e.g. nitrates (NO ₃), nitrogen dioxide (NO ₂) and nitric acid (HNO ₃)) can lead to soil and freshwater acidification. In addition, NO _x can cause eutrophication of soils and water. This alters the species composition of plant communities and can eliminate sensitive species.
Nitrogen deposition (N)	The pollutants that contribute to nitrogen deposition derive mainly from NO _x and NH ₃ emissions. These pollutants cause acidification (see also acid deposition) as well as eutrophication.	Species-rich plant communities with relatively high proportions of slow-growing perennial species and bryophytes are most at risk from nitrogen eutrophication, due to its promotion of competitive and invasive species which can respond readily to elevated nitrogen levels. Nitrogen deposition can also increase the risk of damage from abiotic factors (e.g. drought, frost).
Ozone (O ₃)	A secondary pollutant generated by photochemical reactions from NO _x and volatile organic compounds (VOCs). These are mainly released by the combustion of fossil fuels. The increased combustion of fossil fuels in the UK has led to a large rise in background ozone concentration, increasing the number of days when levels across the region are above 40ppb. Reducing ozone pollution is believed to require action at an international level to reduce levels of the precursors that form ozone.	Concentrations of O ₃ above 40ppb can be toxic to humans and wildlife and can affect buildings. Increased ozone concentrations may lead to a reduction in growth of agricultural crops, decreased forest production and altered species composition in semi-natural plant communities.
Sulphur dioxide (SO ₂)	Main sources of SO ₂ emissions are electricity generation, industry and domestic fuel combustion. May also arise from shipping and increased atmospheric concentrations in busy ports. Total SO ₂ emissions have decreased substantially in the UK since the 1980s.	Wet and dry deposition of SO ₂ acidifies soils and freshwater, and alters the species compositions of plant and associated animal communities. The significance of impacts depends deposition levels and the buffering capacity of soils.

3.23 Sulphur dioxide emissions are overwhelmingly influenced by the output of power stations and industrial processes that require the combustion of coal and oil. Ammonia emissions are dominated by agriculture, with some chemical processes also making notable contributions although traffic can make a notable contribution at a local scale. Emissions of nitrogen oxides are dominated by the output of vehicle exhausts, while stacks of energy from waste facilities and diesel generators associated with some mineral activities also emit NO_x. Emissions of nitrogen oxides could therefore be reasonably expected to be associated with any increase in net vehicle movements as an indirect effect of the Plan.

3.24 According to the Department of Transport's Transport Analysis Guidance, *"beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant"*¹⁵. This distance has therefore been used in this HRA to determine whether European sites are likely to be significantly affected by traffic-related emissions from plan development.

¹⁵ www.webtag.org.uk/archive/feb04/pdf/feb04-333/pdf

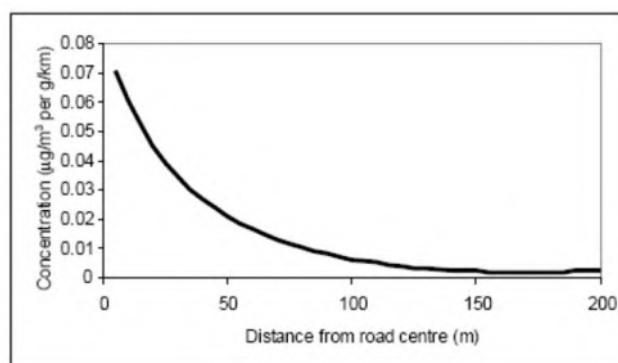


Figure 3. Traffic contribution to pollutant concentrations in relation to the distance from a road (DfT).

- 3.25 According to the World Health Organisation, the critical NO_x concentration (critical threshold) for the protection of vegetation is 30 µg m⁻³; the threshold for sulphur dioxide is 20 µg m⁻³. In addition, ecological studies have determined 'critical loads'¹⁶ of atmospheric nitrogen deposition (that is, NO_x combined with ammonia NH₃).
- 3.26 This assessment therefore considers the effects of traffic movements on European sites where a minerals site may be associated with a net increase in annual average daily traffic (AADT) within 200m of a sensitive European site including the strategic road network. At the same time, it must be borne in mind that a minerals site allocation may be associated with the extension in years of operation for an existing minerals site, rather than a net increase in minerals extraction activity and thus may not be associated with any forecast net change in AADT.
- 3.27 The Environment Agency guidance on screening point-source pollution emitters for more detailed assessment¹⁷ lists the presence of a European site within 10km as one of the indicators that detailed assessment (i.e. dispersion-modelling) may be required for a planning application or Agency consent. The implication of this is that the emissions of a point-source can normally be considered effectively inconsequential on sites located more than 10km distant. While this would not apply to major emitters such as large power stations, refineries and steel works, it would apply to smaller ones such as thermal waste treatment facilities.

Dust

- 3.28 Atmospheric pollutants generated by minerals sites also include dust emissions (to a lesser extent these can also be associated with waste sites). The effects of dust will depend on the prevailing wind direction, and the transport distance is related to particle size. Dust particle size and chemical composition is important as smaller particles can enter or block stomata and thus interfere with gas exchange, while sufficient coverage may prevent light penetration to the chloroplasts. In prolonged cases, death can result.
- 3.29 In the absence of control measures, dust generation is most likely to occur during soil stripping (and from wind blow of associated spoil heaps), extraction or rock blasting, screening, crushing, track out and operation of conveyors. It may also occur during soil manipulation as part of site restoration. For the purposes of screening, according to guidance from the Institute of Air Quality Management¹⁸, with respect to possible effects due to dust, "an assessment will normally be required where there is...an 'ecological receptor' within: 50m of the boundary of the site; or 50m of the route(s) used by construction vehicles on the public highway, up to 500m from the site entrance(s)". Site allocations that lie more than 50m from the European site and do not have scope for large scale production of dust have therefore been 'screened out' as being unlikely to contribute significant dust impacts, even without special mitigation such as 'wetting'.

¹⁶ The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur.

¹⁷ Environment Agency. 2012. Integrated Pollution Prevention and Control - Environmental Assessment and Appraisal of BAT. Horizontal Guidance Note IPPC H1

¹⁸ IAQM. (2016) *Guidance on the assessment of dust from demolition and construction*. The Institute of Air Quality Management. Version 1.1.

Biopathogens

3.30 Some composting sites can result in the production of bio-pathogens, which if released into the environment can result in adverse effects on vegetation within European sites located close to the facility. In previous work in Sussex we have agreed with Natural England a screening distance of 1km to be applied to such facilities.

3.31 In the Plan area there are five European sites that have a particular air quality sensitivity:

- Ashdown Forest SAC
- Castle Hill SAC
- Dungeness SAC, Dungeness, Romney Marsh and Rye Bay SPA, and Dungeness, Romney Marsh and Rye Bay Ramsar
- Hastings Cliffs SAC; and
- Lewes Downs SAC

Water quality and water resources

3.32 The quality of the water that feeds European sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts.

3.33 As a general principle, water quality may be adversely affected by Waste and Minerals sites through pollution through water runoff from hard surfaces carrying oils, heavy metals and/or de-icing compounds. While these effects can be dispersed throughout the downstream water catchment, they will be most visibly manifested within tens of metres to a few hundred metres of the site.¹⁹

3.34 In practice, it is illegal to pollute watercourses (whether or not they are designated as European sites) under the Environmental Damage (Prevention and Remediation) (England) Regulations 2015 and Environmental Permitting (England and Wales) Regulations 2016 so any site where a risk exists will build protection measures into their construction and operational procedures.

3.35 There are several ways in which quarrying / mining can affect water quality/resources:

- Quarries and mines that are below the water table will require dewatering on a regular basis. Dewatering²⁰ can lead to a reduction in the water table and “draw down” from hydraulically linked groundwater dependent habitats (including streams and rivers);
- The physical presence of a new quarry in the unsaturated zone (i.e. above the water table) can increase the possibility of aquifer contamination and result in a direct reduction in temporary groundwater storage capacity;
- If the water that is pumped from a quarry as a result of dewatering has a high proportion of clays and suspended particles, or is contaminated with metals, it can reduce water quality within those watercourses that receive the water; and
- Backfilling a dormant quarry with overburden or imported fill may cause changes to groundwater levels, quality and flow paths in adjoining areas.

3.36 In the Plan area there are three European sites that have a particular hydrological sensitivity:

- Pevensey Levels SAC and Ramsar site;
- Dungeness SAC / Dungeness, Romney Marsh and Rye Bay SPA/ Dungeness, Romney Marsh and Rye Bay Ramsar; and
- Ashdown Forest SAC (which was designated in part for its wet heaths)

¹⁹ Scottish Environment Protection Agency. 2003. Technical Guidance Note - Habitats Regulations & The Landfill Regulations Guidance.

http://www.sepa.org.uk/pdf/guidance/landfill_directive/habitats_landfill_regulations_guidance.pdf

²⁰ Dewatering is most commonly carried out by intermittent pumping from a sump located in the deepest part of the quarry, to keep pace with the inflow of groundwater.

Coastal squeeze

- 3.37 Rising sea levels can be expected to cause intertidal habitats (principally saltmarsh and mudflats) to migrate landwards. However, in built-up areas, such landward retreat is often rendered impossible due to the presence of the sea wall and other flood defences.
- 3.38 In addition, development frequently takes place immediately behind the sea wall, so that the flood defences cannot be moved landwards to accommodate managed retreat of threatened habitats. The net result of this is that the quantity of saltmarsh and mudflat adjacent to built-up areas will progressively decrease as sea levels rise. This process is known as 'coastal squeeze'. In areas where sediment availability is reduced, the 'squeeze' also includes an increasingly steep beach profile and foreshortening of the seaward zones.
- 3.39 As a general principle, waste sites can contribute to coastal squeeze as much as any other development by restricting opportunities for managing realignment. Hastings Cliffs SAC requires opportunities for vegetated sea cliffs to retreat landward. Pevensy Levels SAC/ Ramsar is designated for freshwater habitats that could be affected by future changes to coastal dynamics. The Dungeness complex of sites is also vulnerable to rising sea levels and altered coastal alignments.

Screening distance summary

- 3.40 The table below summarises the screening distances used for each source of impact. The 'screening distance' is the distance within which (using the guidance on pathways available from the Environment Agency and other sources) different sources of impact or types of waste site should be taken forward for more detailed consideration of impacts. The screening distance does not imply that all sites/policies within that zone will lead to an adverse effect on a European site, merely that impacts/effects cannot be dismissed out of hand.

Table 3: Screening distances used for each source of impact.

Pathway	Screening distance
Air quality – Energy from Waste	10km from European site.
Air quality – biopathogens	1km from European site
Air quality – dust	500m from European site.
Air quality – vehicle exhaust emissions	200m from European site.
Water quality and flows	No standard distance – use Source/Pathway/Receptor approach.
Disturbance (noise/visual)	1km from European site supporting disturbance sensitive species/populations.
Coastal squeeze	No standard distance – evaluate on case by case basis.

4. Likely Significant Effects Test

- 4.1 The following table presents the screening assessments for each policy that has been put forward for consideration. Green shading in the final column indicates a policy that has been screened out of further consideration due to the absence of any mechanism for an adverse effect on European sites. Orange shading indicates that further Appropriate Assessment (or at least further screening in the presence of further information) is required since a pathway of impact exists that cannot be screened out at this stage. Note that this HRA does not re-assess policies that are carried over unchanged from the adopted plans as those plans were themselves subject to HRA.
- 4.2 The policy text quoted in Table 4 dates from June 2021. Minor amendments to policy wording which do not change the substance of the policy will not change the conclusions of the analysis in column three.

Table 4. Likely Significant Effects assessment.

Policy Number	Policy Description	Likely Significant Effect
Policy RV1 - Minerals and waste development affecting the South Downs National Park and High Weald Area of Outstanding Natural Beauty	<p>a) Minerals and waste development in the South Downs National Park and the High Weald AONB will have regard to the relevant Management Plan.</p> <p>b) Major minerals and waste development in the South Downs National Park or High Weald AONB will be refused other than in exceptional circumstances, and where it can be demonstrated to be in the public interest²¹. In this respect, consideration will be given relevant information, including:</p> <ul style="list-style-type: none"> i. the need for the development, including in terms of any national considerations; and ii. the impact of permitting or refusing the development upon the local economy; and iii. the cost of and scope for developing outside the designated area or meeting the need in another way; and iv. any detrimental effect on the environment, landscape and/or recreational opportunities and the extent to which it could be moderated. <p>c) Small-scale waste management facilities for local needs are not precluded from the National Park or AONB where they meet the requirements of Policy RD1.</p> <p>d) Proposals for the backfilling of redundant quarries within the National Park or AONB need to conform with (b) above and additionally demonstrate</p>	<p>No Likely Significant Effects</p> <p>This is a development management policy that lists criteria by which developers must comply.</p> <p>The policy does not allocate any development.</p>

²¹ In the case of minerals and waste proposals, all applications are defined by the Town and County Planning (Development Management Procedure) Order 2010 as 'major'. However, for the purposes of this policy, the potential for significant impacts on the National Park and AONB will be dependent on the individual characteristics of each case. When assessing what constitutes 'major development' within a protected landscape the guidance set out in Footnote 55 to the NPPF will be applied.

Policy Number	Policy Description	Likely Significant Effect
	net long-term benefits to the National Park or AONB and that they meet Policy WMP 8b criteria (a) to (e).	
Policy RW1 – Sustainable Locations for Waste Development (excluding land disposal)	<p>The principle of the development will be supported where:</p> <p>A1. The site is located within a broad Area of Focus indicated on the Key Diagram and described in paragraph 5.7, or</p> <p>A2. It has been demonstrated there are no suitable sites available within the Areas of Focus to meet identified needs, or the proposed development is a small-scale facility / extension to existing facility predominantly to meet smaller, more localised needs only²².</p> <p>In addition to criteria A1 or A2 the proposed development must also demonstrate:</p> <p>B1. The proposed development is located on: general industrial land including general industrial estates, employment land (B2/B8 uses), previously-developed land, or land already in waste management uses; or</p> <p>B2. There are no suitable sites available within the locations listed under criteria B1; or</p> <p>B3. The proposal is located at a minerals working or landfill site and the development's lifespan will be limited to the lifespan of the minerals operation or landfill site²³, unless there are overriding reasons why the lifespan should be extended.</p>	<p>No Likely Significant Effects</p> <p>This is a development management policy that lists criteria by which developers must comply.</p> <p>Proposals that come forward within Areas of Focus may require assessment of impacts on European sites at the application stage depending on their nature, but since the WMLP does not make any proposals the simple fact that an Area of Focus is identified will not lead to adverse effects on European sites.</p> <p>The policy does not allocate any development.</p>
Policy RM0 - To ensure the sustainable use of aggregates	<p>Innovative proposals that a) minimise the quantities of aggregates used in construction, and b) prioritise the use of recycled and secondary aggregate over virgin aggregate, are encouraged and will be supported.</p> <p>East Sussex County Council will support Local Plan policies that promote sustainable aggregate use as part of design or Circular Economy policies within Local Plans being prepared by the District and Borough Councils within East Sussex.</p>	<p>No Likely Significant Effects</p> <p>This policy supports the sustainable use of aggregates. However, this policy does not specifically allocate any development and therefore does will not lead to adverse effects on European sites.</p>
Policy RM1 – Provision of aggregates for consumption in the Plan Area	<p>The Authorities will enable the provision of at least 21 million tonnes (averaging 1.4 mtpa) of aggregate material over the the Plan period by seeking to protect, maintain and enhance existing:</p> <p>a) aggregate importation infrastructure and capacity; and</p> <p>b) recycled and secondary aggregate production</p>	<p>No Likely Significant Effects</p> <p>This policy supports the continual development and future expansion of aggregate infrastructure. However, this policy does not specifically allocate aggregate sites rather this policy facilitates for future</p>

²² Smaller, localised facilities can be essential in helping to provide local solutions for collecting, sorting, bulking, and transferring and treating wastes in complementing the waste treatment provided at more strategic larger-scale facilities.

²³ The lifespan of a site may, but does not necessarily, include restoration phase.

Policy Number	Policy Description	Likely Significant Effect
	Proposals for new rail and wharf import infrastructure, and additional capacity for a) and b) (including increased operational capacity within the site boundary of existing infrastructure) will be supported. In particular, support will be given to proposals which further enable sustainable provision of aggregates by sea and/or rail.	development of aggregate infrastructure in line with other development management policies. The policy itself will not lead to adverse effects on European sites and any proposals that come forward must comply with Policy RD1 regarding environmental protection. Nevertheless, it was recommended for clarity that additional wording is added associated with this policy: “... <i>subject to the environmental protection requirements set out in other plan policies</i> ” or similar to ensure protection of European sites is clarified with regards to any proposal brought forward. This text has since been added to paragraph 6.25 of the plan.
Policy RM2 - To ensure a continued supply of specialist clay	<p>An area of additional clay extraction may be proposed in connection with the specialist tile manufacturing facility at Aldershaw Farm as identified on Map 10.2 [Minerals Sites and Infrastructure Map].</p> <p>To be acceptable in principle proposals for an additional extraction area would need to demonstrate that the following criteria can be met:</p> <ul style="list-style-type: none"> i. An assessment of the impact on the Ancient Woodland (Screen Wood and Lane Wood) should be carried out. Where necessary and in accordance with Natural England and the Forestry Commission’s standing advice, appropriate buffers should be incorporated, and mitigation provided, to the satisfaction of both bodies. ii. The impact on the High Weald Area of Outstanding Natural Beauty should be assessed and appropriate mitigation should be included, if required, to the satisfaction of the High Weald AONB Unit. iii. An assessment of the impact on the Beauport Park Local Wildlife Site should be carried out; and where necessary appropriate mitigation provided, to the satisfaction of the County Ecologist. iv. Access to the site would need to be through the existing brickworks. <p>An appropriate mitigation and environmental enhancement scheme for the operations and restoration of the entire extraction site would be required as part of any permission.</p> <p>Proposals should demonstrate how they have considered relevant Policies in the WMP, WMSP and the Development Plan (relevant Local Plan). Any application will be assessed in accordance with relevant development plan policies taking into account any material considerations.</p>	<p>No Likely Significant Effect</p> <p>This policy aims to ensure the current clay extraction site continues to provide provisions of materials for specialist tiles. The site is remote from European sites, being 9km from the closest (Hastings Cliffs SAC). While this does constitute an allocation, this policy is not expected to result in an increase in the scale of extraction or scale/frequency of vehicles movements compared with the site’s current permit. Therefore, likely significant effects are not expected to impact European Sites.</p>

Policy Number	Policy Description	Likely Significant Effect
Policy RM3 – Minerals Safeguarding Areas	<p>Mineral Safeguarding Areas (MSAs), as shown on the Policies Map, identify potentially viable land-won mineral resources and sites.</p> <p>Proposals for non-minerals development on or near the MSA that would sterilise or prejudice the extraction of the mineral resource, or result in incompatible development, should not be permitted.</p> <p>Development proposals within areas shown as Mineral Safeguarding Areas on the Policies Map or that may affect a mineral operation or resource, must demonstrate that mineral resources will not be sterilised and the development is not incompatible with any permitted minerals operations.</p> <p>The Authorities will periodically review and update Mineral Safeguarding Areas as required</p>	<p>No Likely Significant Effect</p> <p>This policy is a development management policy that lists conditions by which developers must comply. Minerals safeguarding does not carry with it any presumption that minerals development will necessarily be permitted; rather it ensures that future minerals resources are not sterilised by conflicting development.</p> <p>The policy is safeguarding mineral rich areas for operations but does not allocate and sites.</p>
Policy RM4 – Prior Extraction of Mineral Resources	<p>All developments within Mineral Safeguarding Areas should undertake prior extraction unless it can be demonstrated to the satisfaction of the MPA that:</p> <ol style="list-style-type: none"> The mineral resource would not be sterilised by the proposed development; and/or, The mineral cannot be practically or feasibly extracted. 	<p>No Likely Significant Effect</p> <p>This policy is a development management policy that lists conditions by which developers must comply. It seeks to ensure that advantage is taken to realise any potential for minerals extraction from sites that are being developed for other purposes, where possible and appropriate.</p> <p>The policy is ensuring mineral extraction is not sterilised by other proposed developments within the MSA.</p>
Policy RM5 – Safeguarding Minerals Infrastructure	<p>Existing, planned and potential railhead and minerals wharf facilities (including rail sidings) and their consequential capacity are safeguarded in order to contribute towards meeting local and regional supply for aggregates and other minerals as well as supporting modal shift in the transport of minerals. The need for railheads and minerals wharves will be monitored.</p> <p>Capacity for landing, processing and handling and associated storage of minerals at wharves in Shoreham, Newhaven and Rye Ports is safeguarded. Alternative use proposals would need to demonstrate that there is no net loss of capacity for handling minerals within a port.</p> <p>Proposals for non-minerals related uses within the vicinity of a infrastructure site should be designed to minimise the potential for conflicts of use and disturbance in accordance with the Agent of Change principle. Proposals for incompatible non-minerals development should not be permitted.</p>	<p>No Likely Significant Effects</p> <p>This policy is a development management policy that lists conditions by which developers must comply. Safeguarding relates to preserving existing infrastructure rather than developing new infrastructure. The purpose of this policy is to ensure that minerals infrastructure is not sterilised by conflicting alternative development.</p> <p>This policy is ensuring the safeguarding of mineral infrastructure but does not allocate any sites.</p>

Policy Number	Policy Description	Likely Significant Effect
	<p>The Authorities will support the co-location of railheads and minerals wharves with processing capacity subject to it being demonstrated that this does not adversely affect space requirements for operational use.</p> <p>The Authorities will periodically review and update Mineral Infrastructure Safeguarded Areas as required.</p>	
RM6 – Safeguarding facilities for concrete batching, coated materials manufacture and other concrete products within the Plan Area	<p>Facilities for concrete batching, coated materials manufacture, and other concrete products are safeguarded against development that would unnecessarily sterilise the facility or prejudice its use. the safeguarded facilities are identified in the Policies Map.</p> <p>Proposals for no-mineral development on or near the site that would prejudice the use of the facility, or result in incompatible development, should not be permitted. Planning permission will only be granted where it is demonstrated that:</p> <ul style="list-style-type: none"> • The proposed development is in accordance with a site allocation in the adopted local plan or neighbourhood plan; • The site is no longer needed; • The proposal is of a temporary nature; or, • The capacity of the site can be relocated elsewhere. <p>The Authorities will periodically review and update safeguarded facilities as required.</p>	<p>No Likely Significant Effects</p> <p>This is a development management policy that lists conditions by which developers must comply. Safeguarding relates to preserving existing infrastructure rather than developing new infrastructure. The purpose of this policy is to ensure that minerals infrastructure is not sterilised by conflicting alternative development.</p> <p>The policy is safeguarding areas for concrete batching etc. but does not allocate sites.</p>
Policy RM7 – Minerals Consultation Areas	<p>Within the County of East Sussex the South Downs National Park, the local planning authority will consult the Minerals Planning Authority on non-minerals development affecting, or potentially affecting, existing minerals sites and facilities identified in the Policies Map. Neighbourhood planning groups will also need to consult the relevant MPA where allocating land affecting MSAs in their Neighbourhood Plan.</p> <p>Types of planning applications not included within the list below which fall into a Mineral Consultation Areas (MCA) will require the consultation of the Minerals Planning Authority. MCAs will be updated when necessary and included in Annual Monitoring Reports, and the local authorities informed accordingly.</p>	<p>No Likely Significant Effects</p> <p>This is a development management policy that lists conditions by which developers must comply. It ensures that future minerals resources are not sterilised by conflicting development.</p> <p>This policy ensures that MSAs are not affected by non-mineral developments.</p>
Policy RD1 – Environment and Environmental Enhancement	<p>To conserve and enhance the built and natural environment development should:</p> <p>a) protect and enhance designated sites, areas and features of</p>	<p>No Likely Significant Effects</p> <p>This is a development management policy that sets out conditions by that</p>

Policy Number	Policy Description	Likely Significant Effect
	<p>environmental and historic importance. as listed in Appendix 3;</p> <p>b) provide measurable net gain in biodiversity and enhancement of natural capital, as guided by the Sussex Nature Recovery Network and any future Local Nature Recovery Strategy; and</p> <p>c) maximise opportunities for functional habitat creation including inter-connectivity between habitats within and outside the site.</p> <p>Permission will not be granted where:</p> <p>x) a site or area of national or international importance is adversely affected, unless there is an imperative overriding public interest for the development and impacts can be sufficiently mitigated, or</p> <p>y) the development would have a significant adverse impact on such a site, area or feature as referred to in a. above.</p>	<p>developers must comply.</p> <p>The policy protects designates sites from adverse impacts and is therefore a positive policy for European sites.</p>

5. Other plans and projects

- 5.1 The law requires projects that can be concluded not to result in adverse effects on integrity alone to also consider potential for likely significant effects in combination with other projects and plans. In this case the conclusion of no adverse effects on integrity from the Review Plan Document is drawn because no mechanism has been identified by which any of the policies in the Review Plan Document could pose likely significant effects. The other plans identified in section 2 of this document could in themselves present potential for likely significant effects but since no pathway of impact from the RPD has been identified no in combination effect will arise.
- 5.2 As such, there is no mechanism for a likely significant effect to arise even in combination with other projects and plans.

6. Conclusion

- 6.1 The plan review makes a single new minerals site allocation, but this is to allow for the temporal extension of an existing site and is not expected to result in a change in annual output or vehicle movements. Otherwise it focusses on safeguarding existing minerals infrastructure. The plan review makes no waste site allocations, rather identifying Areas of Focus centred on existing waste sites. The simple fact that Areas of Focus are identified will not result in likely significant effects on European sites. As a result, it is concluded that the plan review will not result in likely significant effects on any European sites either alone or in combination with other plans and projects.

Appendix A European Sites

Ashdown Forest SAC and SPA

- 1.1 Ashdown Forest is one of the most extensive areas of heathland in south-east England. It lies between East Grinstead and Crowborough in East Sussex and the LPA is Wealden District Council.
- 1.2 Although the area of heathland has declined in recent years due to cessation of grazing and frequent fires, there remain extensive areas of dry heath dominated by ling *Calluna vulgaris* with bell heather *Erica cinerea* and dwarf gorse *Ulex minor*. This heathland supports important lichen communities including species such as *Pycnothelia papillaria*. Bracken *Pteridium aquilinum* is now dominant over large areas. On the damper heath, cross-leaved heath *Erica tetralix* becomes dominant with deer-grass *Trichophorum cespitosum*. The heath and bracken communities form a mosaic with acid grassland dominated by purple moor-grass *Molinia caerulea* with species such as the local petty whin *Genista anglica*. Wet areas provide suitable conditions for several species of sphagnum moss, together with which are found bog asphodel *Narthecium ossifragum*, common cotton-grass *Eriophorum angustifolium* and specialities such as marsh gentian *Gentiana pneumonanthe*, ivy-leaved bell flower *Wahlenbergia hederacea*, white-beaked sedge *Rhynchospora alba* and the marsh clubmoss *Lycopodiella inundata*.
- 1.3 Streams cut through the soft sandstone in places, forming steep sided valleys (ghylls) which are sheltered from winter frosts and remain humid in summer. Uncommon bryophytes such as the liverwort *Nardia compressa* and a range of ferns including the mountain fern *Oreopteris limbosperma* and the hayscented buckler fern *Dryopteris aemula* thrive in this atlantic microclimate. The damming of streams, digging for marl, and quarrying have produced several large ponds in a number of areas of the forest. Although often largely free of aquatic vegetation there may be localised rafts of broadleaved pondweed *Potamogeton natans*, beds of reedmace *Typha latifolia* and water horsetail *Equisetum fluviatile*. These species are particularly abundant in the marl pits. The aquatic habitats support a diverse fauna, including a range of water beetles (Coleoptera) a rare midge *Dixella filiformis*, a diversity of dragonfly and damselfly species (Odonata) and the locally uncommon snail *Vertigo substriata*. Some of the ponds also have large amphibian populations, including the great-crested newt *Triturus cristatus*.

Features of European interest

- 1.4 The site is designated as a SAC for its:
- Wet heathland with cross-leaved heath
 - Dry heaths
 - Great crested newts
- 1.5 The site is designated as a SPA for its:
- Nationally important breeding populations of nightjar and Dartford warbler

Conservation Objectives

- 1.6 The conservation objectives for the European interests on the site are subject to natural change, to maintain²⁴, in favourable condition, the:
- Wet heathland with cross-leaved heath
 - Dry heaths
- to maintain, in favourable condition, the habitats for the population of:

²⁴ Maintenance implies restoration if the feature is not currently in favourable condition.

- Great crested newt
- to maintain, in favourable condition, the habitats for the populations of Annex 1 species of European importance (nightjar and Dartford warbler), with particular reference to:
 - Wet heathland with cross-leaved heath
 - Dry heaths

Key Requirements to Maintain Site Integrity, derived from Conservation Objectives

- Minimal air pollution (nitrogen deposition can cause compositional changes over time)
- Use of grazing management to prevent succession
- Balanced hydrological regime to maintain wet heath.
- Low recreational disturbance
- Absence of urbanisation
- Suitable foraging and refuge habitat within 500m of the pond.
- Relatively unpolluted water of roughly neutral pH.
- Some ponds deep enough to retain water throughout February to August at least one year in every three.
- In a wider context, great crested newts require good connectivity of landscape features (ponds, hedges etc) as they often live as metapopulations in a number of ponds.

Dungeness SAC/Dungeness, Romney Marsh and Rye Bay SPA/Dungeness, Romney Marsh and Rye Bay Ramsar

- 1.7 The complex of European sites located at Dungeness, Rye and Romney Marsh are collectively underpinned by the Dungeness, Romney Marsh and Rye Bay SSSI.
- 1.8 This large area contains a wide variety of coastal habitats and is notified for its saltmarsh, sand dunes, vegetated shingle, saline lagoons, standing waters, lowland ditch systems, and basin fens. Dungeness is a shingle beach of international importance as a large cusped shingle foreland with a complex pattern of ridges reflecting its accretion and development over hundreds of years. The site also contains a natural succession of wetlands from species-rich fen through to sallow carr.
- 1.9 Dungeness is the UK's largest shingle structure and represents the habitat type on the south-east coast of England. The total area of exposed shingle covers some 1,600 ha, although the extent of the buried shingle ridges is much greater. Despite considerable disturbance and destruction of the surface shingle, the site retains very large areas of intact parallel ridges with characteristic zonation of vegetation. It still has the most diverse and most extensive examples of stable vegetated shingle in Europe, including the best representation of scrub on shingle. A feature of the site, thought to be unique in the UK, is the small depressions formed within the shingle structure, which support fen and open-water communities. The extensive areas of natural and semi-natural habitats support a large assemblage of nationally rare and nationally scarce vascular plant species, including populations of four plant species that are listed in Schedule 8 of the Wildlife and Countryside Act 1981 (as amended).
- 1.10 The SSSI is regularly used by an assemblage of at least 40 breeding bird species typical of shingle beaches and saltmarshes, lowland damp grasslands, lowland open waters and their margins, and scrub. This assemblage regularly includes nationally important breeding numbers of several species. Four areas in particular support particular concentrations associated with different combinations of habitats: Dungeness (particularly the RSPB Reserve); Rye Harbour Local Nature Reserve; Pett Level (particularly the Pannel Valley); and Cheyne Court. The extensive areas of open water,

grazing marsh, reedbed and intertidal habitat in the SSSI provide safe feeding and roosting sites for nationally important numbers of waterfowl, together regularly supporting in excess of 20,000 individuals of more than 60 species. The SSSI also supports nationally important numbers of hen harrier *Circus cyaneus* in winter and aquatic warbler *Acrocephalus paludicola* on autumn passage.

- 1.11 The grazing marsh ditches support a large population of water vole *Arvicola amphibius*. Three metapopulations of great crested newt are found within the SSSI. Assemblages of invertebrates include nationally rare, endangered and vulnerable species associated with many of the habitats present on site.

Features of European interest

- 1.12 The site is designated as an SAC for its:

- Annual vegetation of drift lines
- Coastal shingle vegetation outside the reach of waves
- Great crested newt

- 1.13 The site is designated as an SPA for its:

- Nationally important wintering populations of Bewick's swan, bittern, hen harrier, golden plover, ruff and northern shoveler, breeding populations of Mediterranean gull, marsh harrier, avocet, sandwich tern, common tern and little tern, passage aquatic warbler and an assemblage of 34,625 waterbirds during the non-breeding season.

- 1.14 The proposed Dungeness, Romney Marsh and Rye Bay Ramsar site qualifies under four of the nine Ramsar criteria:

Ramsar criterion	Description of Criterion	Dungeness, Romney Marsh and Rye Bay
1	A wetland should be considered internationally important if it contains a representative, rare, or unique example of a natural or near-natural wetland type found within the appropriate biogeographic region.	The following habitats qualify under criterion 1: <ul style="list-style-type: none"> • Annual vegetation of drift lines and coastal fringes of perennial vegetation of stony banks. • Natural shingle wetlands: saline lagoons, freshwater pits and basin fens.
2	A wetland should be considered internationally important if it supports vulnerable, endangered, or critically endangered species or threatened ecological communities	The following threatened ecological communities are under consideration for selection under criterion 2: Communities associated with wetland habitats, including grazing marshes and ditches, saltmarsh, natural freshwater pits, saline lagoons, fens, ponds, gravel pits and margins of water bodies. These communities include at least 25 species of nationally scarce/red-list vascular plants and at least 192 species of Red Data Book/nationally scarce invertebrates. The following vulnerable, endangered or critically endangered species are also under consideration for selection under criterion 2: Greater water-parasit <i>Sium latifolium</i> , Jersey cudweed <i>Gnaphalium luteoalbum</i> , Warne's thread-moss <i>Bryum warneum</i> , water vole <i>Arvicola amphibius</i> , aquatic warbler <i>Acrocephalus paludicola</i> , great crested newt <i>Triturus cristatus</i> , medicinal leech <i>Hirudo medicinalis</i> , De Folin's lagoon snail <i>Caecum amoricum</i> , a ground beetle <i>Omophron</i>

		<i>limbatum</i> , marsh mallow moth <i>Hydraecia osseola hucherardi</i> .
5	A wetland should be considered internationally important if it regularly supports assemblages of waterbirds of international importance.	The site regularly supports over 20,000 waterbirds in the non-breeding season.
6	A wetland should be considered internationally important if it regularly supports 1% of the individuals in a population of one species or subspecies of waterbird.	The site regularly supports internationally important wintering numbers of shoveler <i>Anas clypeata</i> and mute swan <i>Cygnus olor</i> .

SAC/SPA Conservation Objectives

1.15 The conservation objectives for the European interests on the site are subject to natural change, to maintain²⁵, in favourable condition, the:

- Annual vegetation of drift lines
- Perennial vegetation of stony banks
- to maintain, in favourable condition, the habitats for the population of:
 - Great crested newt
- to maintain, in favourable condition, the habitats for the populations of Annex 1 species of European importance, with particular reference to:
 - standing water
 - shingle
 - marshy grassland
 - arable
- to maintain, in favourable condition, the habitats for the populations of migratory bird species of European importance (shoveler), with particular reference to:
 - Standing water
 - marshy grassland

Key Requirements to Maintain Integrity (derived from Conservation Objectives)

- Lack of disturbance by vehicles and walkers, although the coastal shingle (drift-line) vegetation has much greater potential for recovery than the perennial vegetation of shingle banks that occurs further inland.
- Suitable foraging and refuge habitat within 500 m of the newt breeding ponds.
- Minimal abstraction of water.
- Adequate water levels for Ramsar and SAC features such as great crested newts and aquatic invertebrates
- Minimal air pollution
- Maintenance of coastal processes
- Maintenance of grazing / mowing regimes
- Maintenance of groundwater and surface water levels

²⁵ Maintenance implies restoration if the feature is not currently in favourable condition.

- Sufficient space between the site and development to allow for managed retreat of intertidal habitats and avoid coastal squeeze.
- Unpolluted water.
- Absence of nutrient enrichment.
- Absence of non-native species.
- Balance of saline and non-saline conditions

Hastings Cliffs SAC

- 1.16 Hastings Cliffs is a short section of almost natural coastline of dramatic eroding cliffs. It is relatively unaffected by coastal protection and is dependent upon physical processes. The very nature of this soft eroding material results in extensive landslides, with vegetation changing from year to year. The streams of the three glens cut steep sided valleys which are covered in parts by mature woodland dominated by pedunculate oak *Quercus robur*, with beech *Fagus sylvatica*, ash *Fraxinus excelsior* and hazel *Corylus avellana*, and occasional specimens of yew *Taxus baccata*, holly *Ilex aquifolium* and field maple *Acer campestre*. The ground flora varies from communities dominated by bracken *Pteridium aquilinum* on the sands to those dominated by dogs mercury *Mercurialis perennis* and pendulous sedge *Carex pendula* on the clays where the local violet helleborine *Epipactis purpurata* is found.
- 1.17 Alder *Alnus glutinosa* is common along the streams and on wet flushes along with tussock sedge *Carex paniculata*, opposite-leaved golden saxifrage *Chrysosplenium oppositifolium* and ramsons *Allium ursinum*. These wooded streams are sheltered from frosts and support Atlantic bryophytes such as the moss *Fissidens rivularis*, and the liverwort *Dumortiera hirsuta* at its only locality east of Devon, and a number of lichens which are associated with ancient woodland such as *Dimerella lutea*. The woodlands support a range of uncommon and rare beetles, while the Fairlight Glen stream has yielded the only modern records of the rare beetle *Hydraena pygmaea* in south east England.
- 1.18 Near the coast the trees become progressively more affected by salt spray from the sea and at Covehurst Wood there are extremely stunted trees growing on acidic sandstone boulders. Here there is an important bryophyte flora including the liverwort *Lophocolea fragans* at its only locality in south east England.
- 1.19 The woodlands grade into a coastal scrub along the cliff edges, consisting of windpruned thickets of privet *Ligustrum vulgare* and blackthorn *Prunus spinosa*. Within the scrubby areas there are patches of grassland dominated by yellow oat-grass *Trisetum flavescens* and red fescue *Festuca rubra*, common centaury *Centaureum erythraea* and scarlet pimpernel *Anagallis arvensis*. Thrift *Armeria maritima* is common along the cliff edge with the scarce loose silky-bent *Aspera spica-venti*.

Features of European interest

- 1.20 The site is designated as an SAC for its:
- Vegetated sea cliffs

Conservation Objectives

- 1.21 The conservation objectives for the European interests on the site are subject to natural change, to maintain²⁶, in favourable condition, the:
- Vegetated sea cliffs

²⁶ Maintenance implies restoration if the feature is not currently in favourable condition.

Key Requirements to Maintain Integrity derived from Conservation Objectives

- Site is a consequence of erosion processes. It is therefore key that there is land available to provide space to replace habitat lost to erosion. Currently, the adjacent arable land is managed under Countryside Stewardship in order to compliment the habitats associated with the SAC.
- Avoidance of sea defences
- Minimal air pollution.

Pevensey Levels SAC and Ramsar site

- 1.22 The Pevensey levels are designated as a SAC due to the population of Ramshorn snail (*Anisus vorticulus*) present. The Levels are designated as a Ramsar site because they support an outstanding assemblage of wetland plants and invertebrates including many British Red Data Book species. Moreover, the site supports 68% of vascular plant species in Great Britain that can be described as aquatic. It is probably the best site in Britain for freshwater molluscs, one of the five best sites for aquatic beetles and supports an outstanding assemblage of dragonflies. One of Britain's largest and rarest spiders, the fen raft spider *Dolomedes plantarius* has its stronghold at Pevensey. The site also supports a notable assemblage of breeding and wintering wildfowl including wintering lapwing and snipe and breeding sedge warblers and reed warblers which nest in the scrub and reeds in the ditches respectively.

Features of European interest

- 1.23 Pevensey Levels qualifies as a SAC for the following species:

- Ramshorn snail

- 1.24 The Pevensey Levels Ramsar site qualifies under two of the nine Ramsar criteria:

Ramsar criterion	Description of Criterion	Pevensey Levels
2	A wetland should be considered internationally important if it supports vulnerable, endangered, or critically endangered species or threatened ecological communities	The site supports an outstanding assemblage of wetland plants and invertebrates including many British Red Data Book species.
3	A wetland should be considered internationally important if it supports populations of plant and/or animal species important for maintaining the biological diversity of a particular biogeographic region.	The site supports 68% of vascular plant species in Great Britain that can be described as aquatic. It is probably the best site in Britain for freshwater molluscs, one of the five best sites for aquatic beetles Coleoptera and supports an outstanding assemblage of dragonflies Odonata.

Conservation Objectives

- 1.25 The conservation objectives for the European interests on the site are subject to natural change, to maintain²⁷, in favourable condition, the:
- Aquatic habitats supporting internationally important plant and invertebrate populations.

Key Requirements to Maintain Integrity

- Unpolluted water.
- Absence of nutrient enrichment.

²⁷ Maintenance implies restoration if the feature is not currently in favourable condition.

- Control of non-native species (e.g. floating pennywort and *Crassula*).
- Maintenance of appropriate hydrological regime.
- Low recreational disturbance.

Castle Hill SAC

- 1.26 The grassland habitats depend upon grazing by sheep and cattle to conserve and enhance plant (and associated animal) species diversity, particularly of the rarer chalk grassland species. Encroachment by scrub is prevented by cutting and grazing animals. The site is a National Nature Reserve leased to Natural England from the local authority. The site is surrounded by arable land, so leaching and spray-drift are potential threats.

Features of European interest

- 1.27 The site is designated as an SAC for its:
- Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco-Brometalia) (important orchid sites) - This chalk grassland consists of a mosaic of calcareous semi-natural dry grasslands, notably CG2 *Festuca ovina* – *Avenula pratensis* grassland, CG3 *Bromus erectus* grassland and CG4 *Brachypodium pinnatum* grassland. Castle Hill's important assemblage of rare and scarce species includes early spider-orchid *Ophrys sphegodes* and burnt orchid *Orchis ustulata*. The colony of early spider-orchid is one of the largest in the UK.
 - Early gentian *Gentianella anglica*

Conservation Objectives

- 1.28 The conservation objectives for the European interests on the site are subject to natural change, to maintain²⁸, in favourable condition, the:
- Calcareous grassland
 - Early gentian

Key Requirements to Maintain Integrity, derived from Conservation Objectives

- Maintenance of grazing
- Minimal air pollution – nitrogen deposition may cause reduction in diversity, sulphur deposition can cause acidification
- Absence of direct fertilisation
- The site is vulnerable to spray-drift (i.e. eutrophication) from surrounding intensive arable land.
- Low recreational pressure.

Lewes Downs SAC

- 1.29 The grassland habitats depend upon grazing by sheep and cattle to conserve and enhance plant (and associated animal) species diversity, particularly of the rarer chalk grassland species. Encroachment by scrub is prevented by cutting and by grazing animals. The site is an NNR managed by the landowner under a management agreement. Where arable land meets the site boundary, leaching and spray-drift are potential threats.

Features of European interest

- 1.30 The site is designated as a SAC for its:

²⁸ Maintenance implies restoration if the feature is not currently in favourable condition.

- Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco-Brometalia) (important orchid sites) - This chalk grassland site consists largely of CG2 *Festuca ovina* – *Avenula pratensis* and CG3 *Bromus erectus* calcareous grasslands. This site contains an important assemblage of rare and scarce orchids, including early spider-orchid *Ophrys sphegodes*, burnt orchid *Orchis ustulata* and musk orchid *Herminium monorchis*. The colony of burnt orchid is one of the largest in the UK.
- Early gentian *Gentianella anglica*

Conservation Objectives

1.31 The conservation objectives for the European interests on the site are subject to natural change, to maintain²⁹, in favourable condition, the:

- Calcareous grassland
- Early gentian

Key Requirements to Maintain Integrity, derived from Conservation Objectives

- Maintenance of grazing
- Minimal air pollution – nitrogen deposition may cause reduction in diversity, sulphur deposition can cause acidification
- Absence of direct fertilisation
- The site is vulnerable to spray-drift (i.e. eutrophication) from surrounding intensive arable land.
- Low recreational pressure.

²⁹ Maintenance implies restoration if the feature is not currently in favourable condition.

