

East Sussex and Brighton & Hove
Waste & Minerals Development Framework

Waste & Minerals Core Strategy
Preferred Strategy
Options Evaluation Summary

October 2009

Summary of Preferred Options Evaluation Assessments

ISSUE W1 - Waste Minimisation: The amount of waste produced by individuals and businesses must be reduced

KEY STUDIES + EVIDENCE	OPTION W1a Targeting the largest local waste streams	OPTION W1b Targeting the most environmentally damaging waste streams, for example biodegradable waste that produces the most greenhouse gases	OPTION W1c Targeting specific sectors only, such as certain commercial waste producers (e.g. leisure & catering or microbusinesses), or individuals (the general public), or waste produced by local authorities	OPTION W1d Targeting specific geographic areas, based on demographic / economic evidence indicating the likelihood of the highest returns	OPTION W1e Additionally, introduce a policy that requires developers to make a financial contribution towards implementing waste minimisation measures, such as education of residents of the development being proposed	OPTION W1f Encouraging district and borough authorities to include policies in their LDFs aimed at minimising waste during construction and demolition	OPTION W1g Forming partnerships to promote waste minimisation as part of the sustainable design process	OPTION W1h Pro-active approach on waste minimisation. It should set objectives and take the lead on working with delivery partners to implement initiatives	OPTION W1i Fiscal and other measures to influence the amount of waste produced. The Core Strategy should recognise the limitations of its policy remit
Waste Minimisation Study Site Identification Study Information Paper 9 - Climate Change and Waste and Minerals	Not Preferred - option is too detailed for Core Strategy	Not Preferred - option is too detailed for Core Strategy	Not Preferred - option is too detailed for Core Strategy	Not Preferred - option is too detailed for Core Strategy	Not Preferred - option is too detailed for Core Strategy	Not Preferred - option is too detailed for Core Strategy	Not Preferred - option is too detailed for Core Strategy	Preferred option It is appropriate for the Core Strategy to include a policy on waste minimisation. Waste minimisation affects the amount of capacity that the Core Strategy has to plan for (see issues W2 and W6), so it therefore has geographical implications and should be included as a spatial policy. The study on waste minimisation could be supplemented at a later date to add further detail as to which waste minimisation initiatives are most appropriate and should be taken forward in East Sussex and Brighton & Hove.	Not preferred. With the exception of construction and demolition waste, land use planning policies are most likely to influence how waste is managed once it has been generated rather than the amount that is produced. However, as a spatial plan the Core Strategy can go beyond land use planning and should work with partners and other sectors where possible (as per W1h) in accordance with the waste hierarchy.

Summary of Preferred Options Evaluation Assessments

ISSUE W2 - How much additional waste recovery and land disposal capacity is needed

KEY STUDIES + EVIDENCE	OPTION W2a how much capacity will be required in future should be based on the principle of planning for lots of flexibility	OPTION W2b how much capacity will be required in future should be based on the principle of planning for some flexibility	OPTION W2c how much capacity will be required in future should be based on the principle of planning for only low-end capacity forecasts, on a strict 'plan, monitor, manage' basis
<p>Information Paper 1 - The Future Need for Waste Management</p> <p>Residual Waste from London Study</p>	<p>Not preferred. It is unlikely that waste will grow at the rate anticipated by this option. Current and future waste policy and legislation has a focus on minimising waste arisings if this is effective the need for the number of facilities envisaged by this option will become less appropriate. This option therefore risks over-provision. National policy is cautious about over-provision (especially of disposal options) where it would undermine movement up the hierarchy. This option could lead to the over allocation of land for the management of waste which would unnecessarily displace competing land uses e.g. housing, development or other business.</p> <p>In addition this option, which suggests development of a higher number of facilities, is less deliverable as it will require the maximum amount of resources in terms of land and capital expenditure both of which may not be available.</p>	<p>The preferred option is W2b. This option allows some flexibility in the provision of locations, as required by national policy, but minimises the risk of over-provision of facilities that might arise under W2a and also the risk of under-provision or delayed provision that might occur under W2c. Evidence supports a view that it is not appropriate to plan for capacity for land disposal of waste from London.</p>	<p>Not preferred. The option of an adjusted W2c whereby sufficient locations to meet the needs of waste growth under this scenario would be allocated in policy, with a further policy allowing the release of additional locations in the event that monitoring reveals waste growth has exceeded levels envisaged under this option is not preferred. This is because this option would require monitoring at a level of accuracy that is not practical or even possible. In addition, the extreme length of time taken to develop a site would mean decisions to release additional locations would have to be taken well in advance and changes may occur affecting the appropriateness of the decision taken ⁽¹⁾⁽²⁾</p>

ISSUE W3 - Meeting the need for new waste management capacity in accordance with the waste hierarchy

- 1 Also see paragraph 44 of the Inspector's decision on Lidsey landfill, 8 December 2006
- 2 From Audit commission report 'Well Disposed', September 2008: "Procuring a major new waste treatment facility typically takes seven years or more"

Summary of Preferred Options Evaluation Assessments

KEY STUDIES + EVIDENCE	OPTION W3a Meeting regional targets for all types of waste	OPTION W3b Meeting national targets, but taking account of local factors to determine the most likely balance of requirements	OPTION W3c Meet national targets for all types of waste
Information Paper 9 - Climate Change and Waste and Minerals Site Identification Study	While this option is in general conformity with the South East Plan, there is little evidence to support the achievement of the rates of MSW recycling that would be needed to achieve this particular target.	This is the preferred option. The Councils are now developing significant new facilities that will ensure increases in rates of recycling, composting and recovery of municipal waste. Other than for MSW recycling, there is little evidence to suggest that rates of recycling and recovery needed to meet the targets in the South East Plan could not be achieved (although understanding of the situation with regard to C&I waste is limited). The overall rates of diversion from landfill achieved by this option would be the same as those put forward by the South East Plan.	While the targets proposed by this option could be met, this option will result in the greatest amount of waste being diverted from landfill and therefore more land for land disposal would need to be developed. Due to the lack of obvious locations for the disposal of residual waste to land this option is therefore the least preferred.

ISSUE W4 - In order to meet the capacity requirements identified in Issue W2 about number of strategic recovery facilities will be needed in the plan area

KEY STUDIES + EVIDENCE	OPTION W4a A few large facilities locations linked to the main urban settlements	OPTION W4b Many smaller facilities linked to main towns	OPTION W4c Many smaller facilities located away from all settlements	OPTION W4d A few large facilities located away from all settlements	OPTION W4e Facilities of varying sizes in locations with good access to the strategic road network. If necessary, specific, identified, sites in AONB/intended SDNP could be allowed as contingency	OPTION W4e Preferred Option. There are various factors affecting the scale and distribution of waste management facilities. Most facilities have a minimum throughput below which they will not be commercially viable, although this level will be different for differing types of facility. Likewise, arisings of individual waste types may, or may not, be spread equally across the area, or indeed they may be focused in a small number of locations. Similarly, waste production at any one location may or may not be 'significant'. The cumulative effect of these variables means that there is no simple answer to the question of whether large or small scale facilities should be preferred. Rather, the possible development of any one or more facilities is likely to require the use of an appropriate form of business analysis – as can only be undertaken by the market – this is likely to result in a waste-specific pattern of facility provision, depending on the perceived risks associated with either option. For example, the delivery of household waste management infrastructure is more likely to mirror population patterns, as defined by existing household waste site provision, rather than be based around major centralised facilities, whereas the more encompassing treatment technologies tend to be more advantaged by benefits of scale, (i.e. by having a larger throughput, and being capable of handling a larger range of wastes).
Site Identification Study Defining Strategic Waste Facilities study	Not preferred. This option has some sustainability benefits and would enable the waste management industry to achieve economies of scale that larger facilities can enable. However because of the character of the plan area, in particular of its industrial areas, it is difficult to demonstrate that enough suitable sites would be deliverable (available) within the plan period because of competing land uses. There are too sites that are likely to be suitable for large scale built recovery facilities.	Not preferred. This option offers sustainability benefits and flexibility because a greater number of potential sites in the plan area are likely to be able to accommodate smaller facilities than larger facilities. However it may be difficult to ensure provision of sufficient waste management capacity for the plan period, particularly as the criteria for options W4a-d rules out any locations that would directly impact upon specified designated environments. Therefore this option could unnecessarily restrict delivery of otherwise-suitable sites.	Not preferred. This option is contrary to national and regional policy. It is also difficult to deliver with so much of the plan area covered by environmental and landscape protection designations.	Not preferred. This option is contrary to national and regional policy, it is also difficult to deliver with so much of the plan area covered by environmental and landscape protection designations.	Preferred Option. There are various factors affecting the scale and distribution of waste management facilities. Most facilities have a minimum throughput below which they will not be commercially viable, although this level will be different for differing types of facility. Likewise, arisings of individual waste types may, or may not, be spread equally across the area, or indeed they may be focused in a small number of locations. Similarly, waste production at any one location may or may not be 'significant'. The cumulative effect of these variables means that there is no simple answer to the question of whether large or small scale facilities should be preferred. Rather, the possible development of any one or more facilities is likely to require the use of an appropriate form of business analysis – as can only be undertaken by the market – this is likely to result in a waste-specific pattern of facility provision, depending on the perceived risks associated with either option. For example, the delivery of household waste management infrastructure is more likely to mirror population patterns, as defined by existing household waste site provision, rather than be based around major centralised facilities, whereas the more encompassing treatment technologies tend to be more advantaged by benefits of scale, (i.e. by having a larger throughput, and being capable of handling a larger range of wastes).	Option 4e gives maximum flexibility to accommodate changes in waste management practises/technologies and waste streams and ensure that the South East Plan capacity targets can be accommodated.

Summary of Preferred Options Evaluation Assessments

KEY STUDIES + EVIDENCE	OPTION W4a	OPTION W4b	OPTION W4c	OPTION W4d	OPTION W4e
	<p>A few large facilities located linked to the main urban settlements</p>	<p>Many smaller facilities linked to main towns</p> <p>Development of smaller facilities is also more expensive and could result in higher waste management costs for businesses and communities in the plan area.</p>	<p>Many smaller facilities located away from all settlements</p>	<p>A few large facilities located away from all settlements</p>	<p>Facilities of varying sizes in locations with good access to the strategic road network. If necessary, specific, identified, sites in AONB/intended SDNP could be allowed as contingency</p> <p>It also provides greater opportunity to deliver facilities at suitable locations during the plan period because it recognises that if the constraints are too narrow then otherwise appropriate sites may be unnecessarily excluded.</p> <p>Locations close to main urban settlements or main towns, as per Options W4a and W4b would be prioritised for sustainability reasons. However should those sites be undeliverable and it can be demonstrated that further capacity is needed then development could be allowed within the AONB/proposed South Downs National Park provided the sites met the criteria based policies.</p> <p>A comparison of the impacts on the road network of options 4a, 4b, 4c and 4d did not reveal differences of such a significance that would lead to a clear preference being reached for one of the options over the others (3).</p>

ISSUE W5 - Identifying the right types of sites/areas for built facilities for the recycling and recovery of MSW, C&I and C&D wastes and minimising the impacts of those facilities on people and the environment

Summary of Preferred Options Evaluation Assessments

KEY STUDIES + EVIDENCE	OPTION W5a	OPTION W5b	OPTION W5c	OPTION W5d	OPTION W5e
Information Paper 9 - Climate Change and Waste and Minerals Site Identification Study	Not preferred. This option offers little flexibility and may be difficult to demonstrate deliverability of sufficient sites.	Not preferred. This option offers more flexibility than W5a and is likely to be more deliverable, however it may unnecessarily exclude sites that are otherwise sustainable for example within urban extensions that are identified within LDFs.	Not preferred. This option is not consistent with the national/regional policy of prioritising sites on previously-developed land. Further work would be needed to clarify deliverability.	Not preferred. This option is the most flexible but is not consistent with national or regional policy on a number of issues including use of previously-developed land and the proximity principle.	Preferred option. This option is the most flexible and most likely to be deliverable. It combines the benefits of W5a and W5b, whilst also recognising that the criteria needs a degree of flexibility because certain circumstances, such as urban extensions, may offer significant sustainability benefits although further work would be needed to clarify the deliverability of those sites. It aims to steer development away from greenfield locations unless such locations can be demonstrated as being sustainable for the circumstances in which the facility would operate. Design of facilities will also be important in minimising any impacts on the environment (including climate change) and in protecting public amenity as set out in the Spatial Vision.
	only on brownfield/previously developed land (including waste management sites) and in industrial areas, only within settlements	only on brownfield/previously developed land (including waste management sites) and in industrial areas, within and outside settlements.	(In addition to the sites meeting criteria of W5b) it is also acceptable in principle to locate waste facilities on Greenfield sites where it is part of identified growth areas, masterplan areas, urban extensions, or minerals sites	on Greenfield sites generally, within or outside built-up areas	on brownfield/previously developed land (including waste management sites), land adjoining PDL or in industrial areas, and on Greenfield sites which are part of major new or planned development (eg identified growth areas, masterplan areas, or urban extensions), or minerals sites

ISSUE W6 - The need for an appropriate distribution of land disposal facilities for residual waste: options for strategic locations for land disposal facilities

KEY STUDIES + EVIDENCE	OPTION W6a	OPTION W6b	OPTION W6c	OPTION W6d	OPTION W6e	OPTION W6f
Site Identification Study Residual Waste from London Study	The preferred option is a combination of W6a, c and d	W6b should be excluded from the preferred option	The preferred option is a combination of W6a, c and d	The preferred option is a combination of W6a, c and d	W6d should be excluded from the preferred option	W6f should be excluded from the preferred option
	Identify and allocate Land Disposal Sites which are located avoiding water resources & valued environments	Identify and allocate Land Disposal Sites located at existing disposal sites, or at minerals voids, without consideration of environmental constraints and proximity to communities.	Identify and allocate Land Disposal Sites located at existing disposal sites, or at minerals voids, avoiding water resources valued landscapes	Allocation locations for Land Disposal Sites proximate to waste arisings in preference to those which are greater distances from areas of waste arisings	To account for the possible importation of residual waste for Land Disposal, allocate locations for Land Disposal Sites proximate to the borders of the Plan Area in preference to those which are greater distances from the borders	Export of waste for disposal elsewhere (outside the plan area)

Summary of Preferred Options Evaluation Assessments

KEY STUDIES + EVIDENCE	OPTION W6a	OPTION W6b	OPTION W6c	OPTION W6d	OPTION W6e	OPTION W6f
	Identify and allocate Land Disposal Sites which are located avoiding water resources & valued environments	Identify and allocate Land Disposal Sites located at existing disposal sites, or at minerals voids, without consideration of environmental constraints and proximity to communities.	Identify and allocate Land Disposal Sites located at existing disposal sites, or at minerals voids, avoiding water resources valued landscapes	Allocation locations for Land Disposal Sites proximate to waste arisings in preference to those which are greater distances from areas of waste arisings	To account for the possible importation of residual waste for Land Disposal, allocate locations for Land Disposal Sites proximate to the borders of the Plan Area in preference to those which are greater distances from the borders	Export of waste for disposal elsewhere (outside the plan area)
<p>The preferred option is a combination of W6a, c, and d.</p> <p>Options for the spatial location / distribution of land disposal facilities and the relative merits of prioritising existing land disposal sites and mineral voids, or allowing land disposal (landraising) on greenfield sites, have been considered. Spatial relationships between such sites and areas of arisings have also been evaluated. National policy would indicate prioritisation of mineral voids, in preference to developing landraising facilities on greenfield sites. The assessment also indicates a preference for sites that are closer to areas where waste arises.</p> <p>The Waste Local Plan currently allocates Ashdown Brickworks as potentially suitable for Landfill. Ashdown Brickworks offers a substantial mineral void close to one of the major urban areas of waste arisings in East Sussex and Brighton & Hove. Notwithstanding this, it is clear that the development of the Ashdown Brickworks site for landfill would involve the need to overcome a number of environmental and operational constraints. Further, the potential capacity of Ashdown Brickworks would need to be established in more detail than at present to demonstrate soundness of the Core Strategy. In timing terms, this site is also unlikely to fulfil all the necessary requirements. Therefore primary areas of search have been identified that might offer opportunities for the development of a landraise site within them (see Plan 4). This will be investigated further.</p> <p>Regarding London's waste, the report on London's Waste ⁽⁴⁾ concludes that waste is not likely to travel from London or the surrounding areas and there is no spare land disposal capacity in East Sussex and Brighton & Hove. Spatially, if London's waste were to be transported to East Sussex and Brighton & Hove it would have to go to sites with good access to the main road network. The areas close to London are generally in the AONB and therefore unlikely to offer suitable opportunities for the development of Land Disposal facilities. Sites further afield into East Sussex and Brighton & Hove would probably be uneconomic to cater for London's waste and waste would most likely have to traverse the AONB to reach them.</p> <p>Given the constraints on capacity, the timing to bring forward sites, and their poor proximity to London, it is not considered appropriate for East Sussex and Brighton & Hove to provide for the landfill provision for waste from London as per policy W4 of the South East Plan which would negate the need to meet the specific provision identified in policy W3 of the South East Plan.</p>						

ISSUE W7 - Wastewater and sewage sludge treatment

Summary of Preferred Options Evaluation Assessments

KEY STUDIES + EVIDENCE	OPTION W8a	OPTION W8b	OPTION W8c
Information Paper 7 - Hazardous Waste Hazardous waste study	Not preferred. While some hazardous waste arisings will be managed in the area, the small quantities of several types of hazardous waste arising in the area are unlikely to make the development of specialist facilities capable of managing these arisings viable.	Not preferred. This is contrary to the South East Plan which expects Waste Planning Authorities to make provision for hazardous waste management in their area. As East Sussex and Brighton & Hove produces less hazardous waste than other areas, this option may result in a majority of its hazardous waste being exported leading to an unequal management burden being placed on other areas.	East Sussex and Brighton & Hove should manage its own hazardous waste arisings and make a contribution to the management of arisings in the South East region on a basis of net self-sufficiency Preferred option. It is not appropriate for hazardous waste management capacity to be developed for every type of hazardous waste arising in East Sussex and Brighton & Hove as such capacity is unlikely to be commercially viable due to the small quantities involved. In such cases it is better for the waste to be exported to existing facilities, or to areas where it makes more commercial sense for such a facility to be developed due to its proximity to a larger quantity of such arisings. However, where it is considered viable, the development of hazardous waste management capacity should be promoted in order to comply with the principles of ensuring that waste is managed close to its source and within the community of its production. In addition, existing facilities within East Sussex and Brighton & Hove which make a regional contribution to the management of hazardous waste should be safeguarded in order to avoid an unequal burden of hazardous waste management being placed on other areas.
	All hazardous waste arisings should be managed within the Core Strategy area	Hazardous waste should be managed according to market supply and demand	East Sussex and Brighton & Hove should manage its own hazardous waste arisings and make a contribution to the management of arisings in the South East region on a basis of net self-sufficiency

ISSUE M1 - The need to adopt a sustainable, efficient, hierarchical approach to managing and using minerals where practicable in East Sussex and Brighton & Hove

KEY STUDIES + EVIDENCE	OPTION M1a	OPTION M1b	OPTION M1c
Aggregates Resource Study Non Aggregates Minerals Supply and Demand Study Appropriate Assessment (Screening Report) Information Paper 2 - Future Need for Minerals Production & Management	Set a target for reduction in the minerals used in the plan area and seek to implement a wide-ranging programme for awareness raising and encourage individuals, organisations and local businesses to take responsibility for reducing the amount of minerals used	Promote, where practicable, secondary and recycled alternatives in preference to primary materials only where the need cannot be met in a more sustainable way	Rely on market forces to influence the efficient use of mineral resources
	Preferred option is combination of M1a and M1b	Preferred option is combination of M1a and M1b	Not preferred.
	Preferred option is combination of M1a and M1b		
	The setting of a reduction target (rather than an objective) within M1a is considered unachievable due to the appreciable difficulty in determining agreed targets, the lack of mechanisms within planning policy to require the use of alternatives over primary sources and the need to audit compliance based on accurate data that is not available. Furthermore, the demand for minerals (primary or secondary) is a reflection of economic development, an increase or reduction may therefore reflect the level of activity as a whole and not relative proportions. However, setting of a wide-ranging programme for awareness raising which encourages individuals, organisations and local businesses to take responsibility for reducing the amount of minerals used, could be one way of implementing the preferred strategy.		

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KEY STUDIES + EVIDENCE	OPTION M1a	OPTION M1b	OPTION M1c
	Set a target for reduction in the minerals used in the plan area and seek to implement a wide-ranging programme for awareness raising and encourage individuals, organisations and local businesses to take responsibility for reducing the amount of minerals used	Promote, where practicable, secondary and recycled alternatives in preference to primary materials allow production of primary materials only where the need cannot be met in a more sustainable way	Rely on market forces to influence the efficient use of mineral resources
	The remainder of M1a ties in with M1b and is considered to be a pro-active means of delivering on the issue. M1b introduces a hierarchy of mineral resource requires mineral developers to demonstrate that need cannot be met by secondary sources. How this need test should be addressed will be clarified. The plan should also retain some flexibility to account for exceptional circumstances which may arise during the plan period such as the loss of significant wharf capacity, or flooding. The emphasis on demonstrating need for primary extraction over secondary materials remains, but this should be capable of assessment from monitoring and provided adequate data on alternatives is collected.		

ISSUE M2 - Mineral resources, wharf and rail facilities need to be safeguarded

KEY STUDIES + EVIDENCE	OPTION M2a	OPTION M2b	OPTION M2c	OPTION M2d	OPTION M2e (i)	OPTION M2e (ii)
Aggregates Resource Study Non Aggregates Minerals Supply and Demand Study Appropriate Assessment (Screening Report) Information Paper 2 - Future Need for Minerals Production & Management Sustainable Transport Feasibility Study	Identify all existing and potential sites. Draw up a brief for each site setting out how it will be safeguarded looking at the viability of inactive sites and determining their future role	Identifying only those minerals and facilities that are viable to be worked with a brief using consultation areas elsewhere	Identifying only those minerals and facilities that are required up to 2026 with a brief using consultation areas elsewhere	Utilise existing approach based on consultation areas	Using the British Geological Survey safeguarding methodology identify MSAs and MCAs to ensure sufficient land-won mineral resource up to 2026	Safeguarding wharves and railheads to ensure continued capacity in strategic locations
	This option does not cover rail and wharf sites/ facilities. The option would provide a detailed evidence base but difficulty in resourcing would hold up the LDF process.	More applicable to land won - removing reference to facilities and add new option for wharf/rail would provide a more realistic option.	More applicable to land won - remove reference to facilities and add new option for wharf/rail	More applicable to land won - add new option for wharf/rail		A combination of these two options is the preferred option. These options allow a more flexible approach to address the slightly different issues of safeguarding resources, and safeguarding wharves/rail links. Safeguarding wharves on the basis of capacity will be more compatible with regeneration proposals at the Newhaven and Shoreham Ports. Areas for safeguarding should be restricted to the sites needed to deliver reserves/facilities within the period up to 2026 as directed by the BGS survey. Minerals Consultation Areas would be wider reaching to capture the effects of potentially sterilising development.

Summary of Preferred Options Evaluation Assessments

ISSUE M3a Meeting the need for Aggregates

KEY STUDIES + EVIDENCE	OPTION M3a(i) In anticipation of a higher apportionment, not to meet this figure but rely on the Councils' assessment of local supply and demand, as well as existing permissions, to contribute to regional and local aggregate supply	OPTION M3a(ii) In anticipation of a higher apportionment, to investigate additional allocation of aggregates sites to increase land-won supply in an attempt to contribute towards meeting the agreed share of aggregate demand in the region	OPTION M3a(iii) In anticipation of a higher apportionment, to investigate how to increase marine landings to provide further supply	OPTION M3a(iv) In anticipation of a higher apportionment, to investigate how to increase secondary and recycled aggregates and other alternative materials to provide further supply	OPTION M3a (v) Meet regional and local aggregate demand through existing land won aggregate permissions, marine landings at existing wharf facilities and through secondary and recycled aggregates
<p>Aggregates Resource Study</p> <p>Appropriate Assessment (Screening Report)</p> <p>Information Paper 2 - The Future Need for Minerals Production and Management</p>	<p>Part of this option is acceptable and will be used to create new option M3a(v).</p>	<p>Part of this option is acceptable and will be used to create new option M3a(v).</p>	<p>Safeguarding of marine landings (wharves) is covered in Issue M2.</p>	<p>Secondary and recycled aggregates are covered under waste issue W3 & W5.</p>	<p>This is the preferred option. Options i - iv) were drafted before the recent proposal to only increase the Council's apportionment to 0.07mtpa. These options are either possibly inflexible or not deliverable because of land and/or resources availability. However, in assessing the options there are elements of all approaches which when combined together in option M3a (v) are considered viable in delivering a strategy for aggregates provision.</p> <p>Option M3a (v) therefore is consistent in that it aims to meet the agreed apportionment and more deliverable in that it focuses on existing permissions and wharves. Provision of recycled materials is considered more flexible as sites can potentially be located in different locations in East Sussex and Brighton & Hove.</p>

ISSUE M3b - Meeting national requirements and regional development needs for clay

Summary of Preferred Options Evaluation Assessments

KEY STUDIES + EVIDENCE	OPTION M3b (i)	OPTION M3b (ii)	OPTION M3b (iii)	OPTION M3b (iv)	OPTION M3b (v)
<p>Non Aggregates Minerals Supply and Demand Study</p> <p>Appropriate Assessment (Screening Report)</p> <p>Information Paper 2 - The Future Need for Minerals Production and Management</p>	<p>Identify extensions to sites or further areas of search for brick-making sites with less than 25 years remaining</p>	<p>Aim to import clay from other areas within East Sussex to brick-making sites with less than 25 years remaining</p>	<p>Promote maximum recycling of clay products and support stockpiling waste materials for re-use</p>	<p>Only allow clay extraction for flood defence need has been demonstrated to outweigh loss of reserves and any ensuing environmental impact</p>	<p>Identify alternative sources of material for flood defence.</p>
	<p>M3b(i) appears the most sustainable option. However, recognising that there are possible constraints to the delivery of M3b (i) alone, a combination of (i) and (ii) but with an emphasis on (i) may be more realistic. Sufficient clay may not be available from site extensions alone, resulting in a need to import clay. However, importing clay may not be appropriate for a sites that produce specific products requiring a particular type of clay. Furthermore, transporting clay could lead to adverse effects from increased road transport. Therefore, the preferred new option is:</p> <p>"Identify extensions or further reserves within the site for brickworks with less than 25 years remaining. However if it is not possible for sufficient reserves to be identified due to environmental or resources reasons, clay imports may be permitted where essential to sustain production at the brickworks."</p>	<p>Evidence has shown that clay operators appear to be currently maximising recycling and re-use on site. While minerals-recycling generally will be covered by policies under issue M1, it is important that current good practise in recycling and re-use continues and is supported by planning policy.</p>	<p>There are advantages and disadvantages to both (iv) and (v). It appears that clay operators have some concern with "losing" brick clay to flood defences, meaning that both options are supportable (the wording on (iv) being particularly important as it would allow clay extraction from existing reserves only in exceptional circumstances). It is not known at the present time whether there is likely to be any significant demand for clay for flood defences, meaning that option (v) may not be supportable. However, if this option is discounted and a significant demand did emerge, pressure would fall on existing clay sites to provide materials. If clay is required to be imported to existing brickworks to sustain them (as under i/ii), it may be that permitted reserves should be safeguarded for bricks. The advantage to supporting (v) is that clay could be extracted from a site very close to where it was needed (i.e. a borrow pit, as supported by some other Local Authorities), which should minimise traffic implications, although it would be dependent on the availability of the resource and could still have significant environmental effects. Therefore the preferred new option is (iv) with an addition:</p> <p>"Only allow clay extraction for flood defence from existing reserves where an exceptional need has been demonstrated to outweigh loss of reserves and any ensuing environmental impact. If clay from existing permitted reserves is not available or its extraction would not be acceptable, consider proposals to extract clay or other materials from new sites for flood defences on a case-by-case basis and in accordance with other Plan policies."</p>		

ISSUE M3c - maintain supplies to and from British Gypsum works

KEY STUDIES + EVIDENCE	OPTION M3c(i)	OPTION M3c(ii)	OPTION M3c(iii)
<p>Non Aggregates Minerals Supply and Demand Study</p> <p>Information Paper 2 The Future Need for Minerals Production and Management</p>	<p>Maintain reserves of at least 20 years for mined gypsum</p>	<p>Investigate availability of DSG to increase supply and to safeguard and extend lifetime of reserves of mined gypsum</p>	<p>Increase the movement of gypsum products, DSG and recycled materials by more sustainable methods of transport</p>
	<p>Preferred option is a combination of M3ci and M3cii</p> <p>M3ci) relates specifically to mined gypsum at the site, which has until recently only been mined for cement use and has been exported. The mineral is seen as regionally important and reserves need to be safeguarded for this use and now increasingly the plasterboard factory. The option is considered deliverable (the permitted area contains at least 20 years reserves). It is also not mutually exclusive and as mined gypsum is also to be used for plasterboard there is therefore an overlap with option M3ii).</p>	<p>Preferred option is a combination of M3ci and M3cii</p>	<p>M3cii) is now considered to be covered under issue M5.</p>

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KEY STUDIES + EVIDENCE	OPTION M3c(i)	OPTION M3c(ii)	OPTION M3c (iii)
Sustainable Transport Feasibility Study	Maintain reserves of at least 20 years for mined gypsum	Investigate availability of DSG to increase supply and to safeguard and extend lifetime of reserves of mined gypsum	Increase the movement of gypsum products, DSG and recycled materials by more sustainable methods of transport
	<p>The maintenance of supply to the plasterboard factory is key to its production success and by using other sources of gypsum (DSG, other imports and recycled material) the lifetime of underground reserves can be extended and safeguarded. Option M3c(ii) is supported by the key stakeholder and considered flexible and deliverable.</p> <p>It is therefore considered that both options are preferred and that they could be merged into one overall policy.</p>		

ISSUE M3d - The need to determine a policy approach for on-shore oil and gas exploration and development

KEY STUDIES + EVIDENCE	OPTION M3d(i)	OPTION M3d(ii)	OPTION M3d(iii)
<p>Non Aggregates (Minerals Supply and Demand) Study</p> <p>Information Paper 2 - The Future Need for Minerals Production and Management</p> <p>Information Paper 9 - Climate Change and Waste and Minerals</p>	<p>Support the exploration and development of on-shore oil and gas</p> <p>Preferred option.</p> <p>The 'need' for such resources will be determined by Government (eg the Energy White Paper) so this is accepted in the Core Strategy. Although this option offers little environmental protection on its own, it could provide adequate protection when combined with Issue M4. Furthermore modern gas/oil development techniques can help to minimise environmental impacts by locating the headworks away from the actual reserves in order to minimise surface impacts on sensitive environments. So for example even if the resource lies under a nationally significant site then potentially the headworks could lie outside of it. Therefore the important thing is to minimise, and mitigate where necessary, the surface impacts of exploration and development, rather than unnecessarily restrict development according to the location of the reserve. The preferred approach is therefore that proposals for exploratory drilling will be permitted, provided that the planning authority is satisfied that the surface environmental and residential amenity impacts have been minimised. Where exploration boreholes are proposed in sensitive locations, it will need to be demonstrated to the planning authority that within the 'area of search' identified by the applicant, the siting of the proposed development would have the least significant impact.</p>	<p>Not support the exploration and development of on-shore oil and gas on open Chalk Downland or within Ashdown Forest.</p> <p>Protection of sensitive environments will be addressed via Issue M4 and by national policy/legislation so this option is unnecessary repetition of that.</p>	<p>Not support the exploration and development of on-shore oil and gas in AONBs, SSSIs or other international and national designations</p> <p>Option not preferred. Protection of sensitive environments will be addressed via Issue M4 and by national policy/legislation so this option is unnecessary repetition of that.</p>

ISSUE M3e - Provision for local chalk supply

Summary of Preferred Options Evaluation Assessments

KEY STUDIES + EVIDENCE	OPTION M3e (i)	OPTION M3e (ii)	OPTION M3e (iii)
<p>Identify no new reserves and meet need from imports, or alternative materials</p>	<p>Encourage use of substitute material/stock piles of existing chalk to meet need for chalk supply</p>	<p>Safeguard sites of high grade chalk from being used for constructional fill or other similar purposes</p>	<p>The only high grade chalk site with planning permission is currently not operational due to a lack of demand for the chalk for its permitted use. There appears to be no demonstrable demand to use the chalk for other purposes.</p> <p>Any reserves of high-grade chalk are in effect safeguarded from use as construction fill because of (a) restrictions on the existing planning permission or (b) because they are unlikely to be obtainable. Therefore, they would not be available for any use.</p>
<p>Non Aggregates Minerals Supply and Demand Study</p> <p>Information Paper 2 - The Future Need for Minerals Production and Management</p>	<p>The preferred option.</p> <p>The South East Plan identifies the regionally significant issue concerning chalk as supplying cement works. As there are no cement works in East Sussex or Brighton & Hove, there is no requirement to identify reserves, particularly because other demands are likely to be for relatively small quantities which would not warrant the identification of new resources. It is therefore not considered necessary to include a chalk-specific policy within the Core Strategy, instead relying on other policies concerning matters such as environmental impact and amenity. Identifying no new reserves is also likely to support requiring restoration of existing, inactive sites. However, to achieve this it may be necessary to prepare detailed considerations at site level (a framework) to deal with inactive or dormant sites.</p> <p>There are no operational chalk quarries, and there are significant constraints on developing any further sites/extending existing sites, particularly due to the Sussex Downs Area of Outstanding Natural Beauty and future National Park.</p> <p>It is understood that chalk lime for agriculture is sourced from outside the county. West Sussex has a 126 year land-bank of chalk, and Kent also has a significant land-bank.</p>	<p>Substitute materials cannot always be used, for example for agricultural lime, and sometimes for construction. Therefore, there is evidence that the option is not deliverable and a high risk that the option could not be fully implemented.</p> <p>M3e (ii) is not deliverable alone because of the lack of stock-piles of existing chalk and the significant constraints in extracting any further chalk from existing sites or any new sites.</p>	<p>The only high grade chalk site with planning permission is currently not operational due to a lack of demand for the chalk for its permitted use. There appears to be no demonstrable demand to use the chalk for other purposes.</p> <p>Any reserves of high-grade chalk are in effect safeguarded from use as construction fill because of (a) restrictions on the existing planning permission or (b) because they are unlikely to be obtainable. Therefore, they would not be available for any use.</p>

ISSUE M4 - Protection of designated areas and reducing the environmental impact of minerals development

KEY STUDIES + EVIDENCE	OPTION M4a	OPTION M4b	OPTION M4c	OPTION M4d	OPTION M4e
<p>Aggregates Resource Study</p> <p>Non Aggregates Minerals Supply and Demand Study</p>	<p>Prioritise locating minerals extraction and production sites in a manner that does not cause unacceptable adverse impact</p>	<p>Not support at all locating minerals production sites in international and national designated areas and in close proximity to settlements</p>	<p>Establish stringent development criteria to assess the environmental and health impacts of new sites</p>	<p>achieve appropriate restoration of a high standard and seek beneficial after-uses</p>	<p>Devise framework for inactive or dormant sites to include assessing viability and seek restoration if appropriate</p>
	<p>Preferred option is combination of M4a and M4c</p>	<p>Not preferred</p>	<p>Option to be combined with waste policy</p>	<p>Option to be combined with waste policy</p>	<p>Preferred option is combination of M4a and M4c</p>
	<p>Preferred option is combination of M4a and M4c, in combination with development control policies to establish criteria. This is a flexible approach as it does not prevent any site from being considered, yet gives priority to those with fewer likely impacts.</p>				

Summary of Preferred Options Evaluation Assessments

KEY STUDIES + EVIDENCE	OPTION M4a	OPTION M4b	OPTION M4c	OPTION M4d	OPTION M4e
Appropriate Assessment (Screening Report) Information Paper 2 - The Future Need for Minerals Production and Management	Prioritise locating minerals extraction and production sites in a manner that does not cause unacceptable adverse impact	Not support at all locating minerals production sites in international and national designated areas and in close proximity to settlements	Establish stringent development criteria to assess the environmental and health impacts of new sites	achieve appropriate restoration of a high standard and seek beneficial after-uses	Devise framework for inactive or dormant sites to include assessing viability and seek restoration if appropriate

ISSUE M5 -Sustainable transport of minerals into and within the plan area

KEY STUDIES + EVIDENCE	OPTION M5a	OPTION M5b	OPTION M5c
Sustainable Transport Feasibility Study Information Paper 8 - Transportation of Waste and Minerals Non Aggregates Minerals Supply and Demand Study	Encourage and safeguard minerals developments which seek to reduce the level of transportation and/or involve movement of materials by sustainable means of transport. Not preferred. Although supportive of sustainable transport, the option is not realistic about the lack of rail/water infrastructure within East Sussex and Brighton & Hove and the anticipated expense of providing new or improved infrastructure (or replacement for that which has been lost e.g. Railheads) for transport of minerals. Therefore the focus for this issue should be about minimising transport of minerals rather than seeking a modal shift.	Review existing operations to see if there are mechanisms to encourage transport by more sustainable means Option extends beyond the remit of the plan because it would require funding from outside sources that the Core strategy cannot necessarily secure commitment for. Also M5b is covered by M5a to an extent because M5a could also involve talking to existing operations.	Support sustainable means of transporting minerals within and in and out of the plan area This option makes it clearer that the policy can only support the sustainable movement of minerals within and in and out of the plan area, due to the cost involved in reinstating rail sidings in the plan area. It needs to be realistic and deliverable and focus on minimising transportation.

Summary of Preferred Options Evaluation Assessments

Information Papers

1. The Future Need for Waste Management
2. The Future Need for Minerals Production and Management
3. Sustainable Resource Use and Management
4. Waste Management Methods and Technologies
5. Residual Waste Disposal
6. Spatial Portrait of East Sussex and Brighton & Hove
7. Hazardous Waste
8. Transportation of Waste and Minerals
9. Climate Change and Waste and Minerals
10. Wastewater and Sewage Sludge Treatment

Studies and assessments

- Aggregate Resource Study
- Appropriate Assessment (Screening Report)
- Combined Heat and Power (CHP) Feasibility Study
- Defining Strategic Waste Management Facilities Study
- Equalities Impact Assessment
- Hazardous Waste Study
- Residual Waste from London Study
- Non Aggregate Minerals Supply and Demand Study
- Strategic Flood Risk Assessment
- Site Identification Study
- Road Transport Impact Assessment
- Sustainable Transport Feasibility Study
- Waste Minimisation Study

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