

Draft Waste and Minerals Plan 2011

Foreword

The Plan is in fact a partnership plan between the South Downs National Park Authority, East Sussex County Council and Brighton & Hove City Council. Since the previous plan, the SDNP has been established and as the related authority has joined in partnership with the other two authorities, which in the context of Plumpton and Plumpton Green may be helpful in any future planning applications for waste or minerals extraction.

The Plan notes that there are significant challenges existing for waste and minerals. The three authorities aspire to a) to achieve higher and higher waste recycling rates, b) recover materials and energy where recycling cannot be achieved or afforded, and c) reduce land disposal to a minimum. On minerals, they are striving to use recycled materials to reduce digging for them. Where necessary, they are looking to use to the full existing permissions for mineral extraction. They are also looking to conserve important areas including the National Park.

They have also made significant changes to their approach in the light of comments on the Preferred Strategy (which was the document that led to the local concerns about land-raise sites) – as a result there are now no intentions to implement land-raise sites in this Draft Waste and Minerals Plan. In a change of tone the report comments that there are constraints to the land disposal of waste in the plan area. Pursuing alternatives to land disposal is a key maxim and an acknowledgement that there has to be a reliance on existing landfill capacity outside the three authorities' areas.

Policy Context

It may be helpful to briefly try and put this Plan into context of other over-arching documents and strategies which have had to be taken into account by the three authorities, which offers a degree of assurance that there is joined up thinking at national level.

In preparing the Plan, any County's plan has to take into account international, national, regional and local policies relevant to waste and minerals. As a result, of relevance to Plumpton at the local level, the Waste and Minerals Plan has to take into account the recently established Sustainable Community Strategies for East Sussex which has commitments to reducing carbon emissions.

A number of European Union (EU) Directives provide important context for planning for waste and minerals. Two Directives in particular emphasise the need to change the way that waste is dealt with. These are: the Waste Framework Directive (2006/12/EC and revisions in 2008/98/EC), which aims at reducing the amounts of waste requiring treatment and at encouraging the use of waste as a resource; and the Landfill Directive (1999/31/EC) which requires substantial reductions in the quantities of waste that is landfilled, and encourages diversion of non-recyclable and non-reuseable waste to other methods of treatment.

The 'Waste Strategy for England 2007' puts into effect the requirements of the Waste Framework and Landfill Directives at a national level by identifying a series of objectives and targets and the role of stakeholders, such as the waste industry and local authorities, in delivering those targets. It also emphasises the importance of moving the treatment of waste away from landfill and up the 'waste hierarchy'. The Waste Strategy Annual Progress Report 2008/9 and the Government Review of Waste Policy in England 2011 provide subsequent updates and have also been taken into account.

The Plan Area is within the South East region, so the Regional Spatial Strategy (RSS) for the South East, the 'South East Plan', published by the Government in 2009, is part of the statutory development plan which must be taken into account when making planning decisions. The Government has since stated its intention to abolish RSSs via the Localism Bill (2010) but until such time (expected 2012/13) then the Plan must continue to be in 'general conformity' with the South East Plan. The South East Plan includes policies about the amount of provision the plan should make for waste treatment and disposal and for mineral production, as well as targets for reducing the amount of waste sent to landfill and allocations for the management of residual waste from London.

Two other documents that are of relevance to the formulation of the Plan, and may have indirect consequence to the Plumpton area are a) the Local Transport Plan for East Sussex which identifies the Bexhill/Hastings Link Road and the Newhaven Port Access Road as priorities to help move waste and minerals; and b) the Environment Strategy for East Sussex sets out how both the natural and built environment within our county will be protected and enhanced. In addition, as the Parish Council is aware, each District Council is also preparing its Local Development Framework, and it is claimed that the Waste and Minerals Plan has been prepared to avoid any material conflict with these.

It is worth noting that in regard to landraise the three Authorities took into account the responses received to the Preferred Strategy document leading to a reassessment of constraints in terms of highways, environment and amenity and concluded that the *"potential for development of a landraise site is at best limited, with constraints that appear difficult to overcome. The overall conclusion is therefore that there is no real prospect for a landraise site in the Low Weald and on Areas of Search have been put forward in the Plan."*

Characteristics of the Plan Area

a) Environment

Large parts of the Plan Area are subject to environmental protection. Two thirds of the area is covered by the South Downs National Park and the High Weald Area of Outstanding Natural Beauty, and other tracts of land are also designated as being of international and national environmental importance.

b) Population and Households

Over the period 2009-2026, the number of households in East Sussex is likely to increase by 9%, which is faster than the expected growth of the population of 4.5% for the same period. This is because the average household size is expected to decrease from 2.16 in 2011 to 2.06 in 2026.

East Sussex has the highest percentage of very elderly residents (over age of 85) of any county in England.

As a result, it is thought that the increase in population and households could lead to an increase in waste arisings, even if the average waste generated per household decreases. Demand for minerals may increase to enable the construction industry to meet the demand for new residential development and infrastructure needed to support it.

Waste in the Plan area

Around 1.75 million tonnes of solid waste are handled in the Plan area every year. It covers:

- Municipal solid waste (mainly kerbside collection; recycling centres, street-cleaning and parks & gardens)
- Commercial and Industrial Waste
- Construction & Demolition Waste
- Other wastes
- Waste water (ie sewage)

The Plan notes that although progress has been made towards more sustainable management of waste, between 15% and 39% of the above wastes (depending on type) still end up in landfill. The Plan acknowledges that this is unsustainable and that landfilling waste prevents it being used as a resource, it is the least environmentally acceptable waste management option and landfill costs are rising steeply. As noted above, this is a welcome change in approach.

Minerals in the Plan Area

Whilst the Plan talks about a range of minerals extracted in East Sussex, the only two that are of real relevance to Plumpton are a) building sand with Stantons Farm (Novington) being the only site in East Sussex; b) clay extraction for brick and tile manufacture with Chailey Brickworks being one of four sites across East Sussex.

The vision for the Plan area to 2030 for both waste and minerals is that (*extracted from the draft Plan*):

- *the environmental footprint, in particular greenhouse gas emissions, associated with the production and management of waste and minerals in the Plan Area will have been significantly reduced.*
- *the annual growth in waste will have stopped and the efficient production and use of materials will have been maximised. Most waste will be reused, recycled to provide goods or raw materials, or processed to provide energy (heat or power), with as little as possible being disposed of because it is the least sustainable option and because the environmental characteristics of the Plan Area mean that opportunities for disposal to land are severely restricted.*
- *facilities needed to manage waste and produce minerals will be designed, located, and operated to ensure that the area's built and natural heritage are preserved and even enhanced - from its exceptional countryside, which includes part of the South Downs National Park, a Heritage Coastline, and Ashdown Forest and the Weald, to its distinctive and varied built environment*

which includes seaside towns and a city with grand Regency architecture as well as scattered Weald and downland villages.

- *the production of secondary materials will be maximised but where primary minerals are essential to meet the need for new development, both locally and the needs of the wider South-East region, the extraction and use of aggregates, clay, chalk, and gypsum, will take place in an efficient manner that protects the environment and local communities.*
- *new planning applications for waste or minerals development will take into account concerns and interests of host communities, and seek to capture benefits for the local community.*

To my mind, the Plan is an improvement on its predecessor, because of the joined up thinking in determining the objectives and policies for waste management and mineral extraction taking into account issues on environmental protection, climate change, carbon emission reductions and working with communities.

The remainder of the Plan document sets out detailed strategic objectives, policies and delivery strategies – most of which to my mind seem sensible in terms of things such as prudent and efficient use of minerals, the need to reduce the amount of waste, the use of land for waste disposal as a last resource, recognising that waste could be a useful resource, the need to protect and enhance the environment, communities and human health through minimising harmful emissions to air, water and land.

Should Councillors feel that they wish to read more of the detail I would refer them to http://consult.eastsussex.gov.uk/portal/wm/dwmp/draft_waste_and_minerals_plan_october_2011?pointId=1950333#document-1950333

However, the one area that I thought may be worth elaborating on is the document's approach to the provision and use of aggregates in the context of the South Downs National Park, as in the light of the sandpit workings at Stantons Farm, this may be of concern/interest to residents in Plumpton.

Minerals and Waste Development in the South Downs National Park

(salient and useful extracts from the Plan):

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

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.

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 the National Park.

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 except in exceptional circumstances. Applications for such within a National Park must be demonstrated to be in the public interest and, meet the assessment needs of considering the need for the development; the cost of and scope for developing alternative sites elsewhere; and any detrimental effect on the environment, landscape and recreational opportunities.

Soft sand: *There are existing mineral resources within the National Park where it falls within the Plan Area. The Folkstone Bed formation runs through the length of the National Park between Hampshire, West Sussex and East Sussex. Within the Plan Area, the formation runs eastwards from Ditchling. Associated with this formation is soft sand for which there are current operational reserves within the National Park (Stanton's Farm Quarry).*

Minerals and waste development for the SDNP should demonstrate that it contributes to the sustainable development of the area. Such development should not take place except in exceptional circumstances, where it can be demonstrated to be in the public interest. In this respect consideration will be given to

- a) The need for development*
- b) The impact of the development on the local economy*
- c) The cost of and scope for developing outside the designated area or meeting the need in another way*
- d) Any detrimental impact on the environment*

Development will only be deemed to be in the public interest if the outcome of a) to d) above gives sufficient reason to override the potential damage to the natural beauty, cultural heritage, wildlife or quiet enjoyment of the SDNP.

Extensions to existing soft sand quarries will need to conform with the above and additionally demonstrate that the need could not be practically achieved by extraction from adjoining Counties.

Proposals for the backfilling of redundant quarries within the SDNP need also to conform to the above and additionally demonstrate net long term benefits to the SDNP.

The Stanton's Farm quarry works a limited exposure of the Folkestone Beds and produces soft sand for mortar and building sand, as well as some coarse sand for concrete. Extraction began in 2007 and the current permission expires in 2015 with an annual potential production of around 40,000 tonnes pa. Stanton's Farm fulfils a strategic role as the natural quality of the soft sand worked in the Folkestone beds is not replicated elsewhere and there are currently no suitable alternative or

substitute materials available. Estimated reserves are around 120,000 tonnes meaning that at current rates of extraction there is reserve until 2017 (2 years post the current permission).

Scotney Court is the only other sand quarry in the County, but it does not have soft sand.

The Plan states that levels of aggregate production will be monitored yearly and this policy will be reviewed to ensure that aggregates resources are brought forward to meet local need in a sustainable way. The Mineral Planning Authorities will consider the potential of sites to contribute to the apportionment (100,000 tonnes pa), in consultation with neighbouring authorities, landowners and local communities.

There are also guidelines for the appropriate restoration of mineral workings which may be of interest to Plumpton once the current workings are fully extracted. The engagement of the Plumpton Wildlife and Habitat Group may be of considerable benefit in this regard.

What is not yet known is whether the current owner of Stanton's Quarry will wish to extend the extraction licence or indeed extend the licence to surrounding land. The restrictions being put forward in this Plan as a result of the SDNPA being one of the relevant Planning Authorities may preclude such an application being put forward.

However, it is recommended that the Parish Council continues to keep a watching brief on the situation, through the Novington Sandpit Residents Association and the Plumpton Wildlife and Habitat Group.