

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

Waste and Minerals Local Plan Review

Sustainability Appraisal
Main Modifications Addendum

August 2023



Preamble & Copyright

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1. Introduction

- 1.1 This document is an addendum to the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan: Revised Policies Document Sustainability Appraisal (August 2021).
- 1.2 The East Sussex, South Downs and Brighton & Hove Waste and Minerals Revised Policies Document (RPD) is a draft local plan document that sets out 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.
- 1.3 The Sustainability Appraisal 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.
- 1.4 For the purposes of this Sustainability Appraisal, “the Plan” refers to the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (WMP), East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan (WMSP) and East Sussex, South Downs and Brighton & Hove Revised Policies (RPD) in combination, also known as the Waste and Minerals Local Plan (WMLP), whilst the RPD or revised policies refers to the proposed amendments.

2. Context for Addendum - Proposed Main Modifications

- 2.1 Since the publication of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan: Revised Policies Document Sustainability Appraisal in August 2021, East Sussex County Council, Brighton & Hove City Council and the South Downs National Park Authority, which are collectively known as the Authorities, held a public consultation on the legal compliance and soundness of the Draft Revised Policies, after which the RPD and its supporting documents were submitted to Government. This then started the current Public Examination being undertaken by independent Government Inspectors.
- 2.2 During the Public Examination, the Authorities have proposed several modifications to the RPD to address some of the matters raised in the consultation and Public Examination. Other modifications have also been proposed to fix factual, typographic, and other minor errors.

- 2.3 This addendum consists of two main parts, the first is an assessment of whether the proposed modifications alter the conclusions of the SA, and if so a reassessment of the relevant sections of the SA forms the second part of this addendum. It will focus on those modifications considered to be “main modifications”, i.e., those that have the potential to make the biggest difference, rather than the more minor corrections.
- 2.4 As these modifications are refined policies based on previously selected options as set out in the SA, the options considered, and their assessments do not require update at this time.
- 2.5 Since the publication of the Sustainability Appraisal in August 2021 the legislative, policy, guidance context is broadly unchanged. The Government is currently seeking to introduce proposals to reform the planning system through the Levelling Up and Regeneration Bill and changes to the National Planning Policy Framework; and are also seeking to introduce a mandatory 10% gain in biodiversity requirement for most future development. In the Plan Area, no new environmental sites of national or international importance have been designated, nor have any existing designations been altered since the publication of the Sustainability Appraisal. The issues present in the Plan Area identified in the Sustainability Appraisal remain unchanged. There are, therefore, no updates to other sections of the Sustainability Appraisal in this addendum.

3. Criteria for deciding if reassessment is required.

- 3.1 To assess whether a re-assessment of a policy and its supporting text is required, the following process is used:
- 3.2 First, the changes proposed are identified. Of the changes identified, those that are minor in nature, such as minor typographical corrections, are discounted.
- 3.3 Consideration is then given as to if a reassessment is required, in doing so, the following questions are considered:
 - Are the proposed changes likely to alter the outcome of the assessment of any of the criteria against which the policy was assessed?
 - If so, would the change in outcome result in a significant change? i.e., would a criterion previously assessed to be not applicable, now be relevant, or where an assessment took place, a significant change to the impact or significance of that effect?
 - Additionally, would the proposed change result in additional areas or localities being affected and / or mitigation being recommended?

- 3.4 **If it is identified that the answer to any of the above questions is yes, then a reassessment of that policy and its supporting text is likely to be appropriate.**

4. Assessment of Proposed Modifications

4.1 The table below sets out the key changes and an assessment of whether reassessment is required.

Section [Main Mod No.]	Key Alterations Proposed Following Public Hearings	Is Sustainability Appraisal reassessment required?
1. Introduction & 2. Summary of Policy Review [MM01]	Change of Plan Period to match Waste and Minerals Plan Vision, i.e., to the year 2030.	No - Alteration of plan timescale, reducing it from 15 to 11 years, does not alter the principle and contents of the policies being assessed within the Sustainability Appraisal.
1. Introduction & 2. Summary of Policy Review [MM01]	New paragraphs added to explain and justify the modified plan period to 2030.	No - The additional supporting text provides the reader with an explanation for the plan period change and justifies the change.
2. Summary of Policy Review [MM01]	Additional column is added to the summary of policy review table at section 2 to provide further information on whether policy review is likely to have an impact on other policies in the WMLP.	No - This modification provides clarity on how revised policies will affect other policies in the WMLP. The proposed modification will not have an overall effect on the conclusion of the SA.
4. Overarching Strategy - Minerals and Waste Development affecting the South Downs (RV1) [MM02]	Modifications to policy to explain how development should contribute to the outcomes, objectives and priorities of the relevant Management Plan of the South Downs National Park or High Weald AONB and modifications to the supporting text reducing the use of acronyms in the document.	No - Alterations do not materially affect the policy's aims and likely outcomes and the removal of acronyms result in further clarity of the policies phrasing.

<p>4. Overarching Strategy - Minerals and Waste Development affecting the South Downs (RV1) [MM02]</p>	<p>Additional policy wording added clarify acronyms and provide clarification of what constitutes a designated area.</p>	<p>No - Minor modifications to policy wording to ensure policy is clear, this does not have an effect on the intention of the policies or the outcome when the policy is applied. Further reassessment is not required.</p>
<p>4. Overarching Strategy - Minerals and Waste Development affecting the South Downs (RV1) [MM02]</p>	<p>Modifications to two footnotes to policy RV1 To make clear how major development is determined in relation to development in the protected landscapes and to ensure consistency in what is deemed a small-scale waste facility.</p>	<p>No - The modifications proposed to the footnotes will ensure the policy can be applied consistently by the user, the modifications do not change the outcome expected when the policy is applied, and, therefore, there is no need for re-assessment.</p>
<p>5. Providing for Waste (RW1) [MM03]</p>	<p>Clarification of supporting text in introduction to specify the types of application that the policy relates to.</p> <p>Additional supporting text added summarising relevant sections of the NPPF that informed the policy.</p> <p>Additional supporting text added providing context in relation to net self-sufficiency, the South East Waste Planning Authority Group Statement of Common Ground, waste management provision within the WMLP and Policy WMP5.</p> <p>Additional supporting text justifying the chosen Area of Focus in policy.</p> <p>Added cross reference to WMP19 Co-location of Complementary Facilities.</p>	<p>No - Clarification provides helpful guidance to reader but does not alter scope of the policy’s applicability. Added supporting text provides context and justification but does not alter the effect of the policy.</p>
<p>6. Providing for Minerals - Sustainable</p>	<p>Modifications to policy removing reference to “innovative” development and altering text to</p>	<p>No - Removing the word ‘Innovative’ and its replacement with “maximise the sustainable use of aggregates” does not impact upon the aims and</p>

<p>use of Aggregates (RM0) [MM04]</p>	<p>read “maximise the sustainable use of aggregates” and aligning it with existing policy WMP3a.</p> <p>Clarification in policy in respect of who will be supported during local plan preparation.</p> <p>Deletion of supporting text in 6.6; paragraph 6.7 moved into policy for clarity.</p>	<p>objectives of the policy in terms of encouraging the sustainable use of aggregates. Other clarifications will not affect assessed likely effects of policy. The alterations are considered to not impact upon the assessment within the Sustainability Appraisal.</p>
<p>6. Providing for Minerals - Provision of Aggregates for the Plan Area (RM1) [MM05]</p>	<p>Additional supporting text providing context and justification in relation to the provision of aggregates.</p> <p>Additional supporting text addressing the determination land-won aggregate development.</p> <p>Review of quantity of aggregate provision stated within policy.</p> <p>New policy clause added (3) which now includes support for proposals for land won aggregate extraction.</p>	<p>Yes - The addition of a new policy clause (3) which allows for land won extraction will affect the intention of Policy RM1 and the potential outcomes when the policy is applied. Clause 3 allows for the support of new land-won aggregate extraction where any proposal complies with other relevant policies within the Development Plan and does not result in unacceptable adverse impacts.</p>
<p>6. Providing for Minerals - Provision for an additional extraction area at Aldershaw Farm (RM2) [MM06]</p>	<p>Clarification of the requirements within the policy including the need for an Environmental Impact Assessment and safeguarding of Beauport Park Local Wildlife Site.</p> <p>Additional supporting text providing guidance on required Transport Assessment and Site Management Plan for management of impacts arising from vehicle movements.</p>	<p>No - The amendments to the policy do not materially impact on either the likely outcome of the policy or the existing assessment of the policy within this Sustainability Appraisal.</p>

<p>6. Providing for Minerals - Introduction to Minerals Safeguarding [MM07]</p>	<p>Insertion of new introduction to minerals safeguarding.</p>	<p>No - This additional introductory text is considered to be a <i>de minimis</i> alteration (minimal alteration) and to have no impact on the Sustainability Appraisal.</p>
<p>6. Providing for Minerals - Safeguarding Mineral Resources (RM3) & Prior Extraction of Mineral Resources (RM4) [MM08]</p>	<p>Merging of Policies RM3 and RM4 into single Policy. Alteration to policy text in relation to when development will be acceptable. Remove reference to “satisfaction of MPA” and “operation”. Clarified definition of “sites” in policy. Additional supporting text detailing the approach in plan to extent of mineral safeguarding areas for sharp sand, and justification for departing from national policy, where applicable. Include detail of approach as to what criteria and intelligence is required when safeguarding. Additional supporting text explaining application of policy in respect of Mineral Resource Assessments and Prior Extraction.</p>	<p>Yes - By combining the two policies it is considered that the new joint policy will need to be reviewed to see if any material alterations to the Sustainability Appraisal will result. Policy RM3 now covers both Minerals Safeguarding Areas and non-sterilisation of mineral resources. There is alteration to wording relating to Minerals Safeguarding Areas which now says that areas are feasible rather than viable, this semantic change could lead to potentially more sites being safeguarded and therefore have a knock-on impact on the results of the previous Sustainability Appraisal. The policy although supporting further safeguarding, also permits development near Mineral Safeguarding Areas if it can be demonstrated in an Assessment that specific identified requirements are met.</p>
<p>6. Providing for Minerals - Safeguarding Minerals Infrastructure (RM5) [MM09]</p>	<p>Consequential change as a result of MM07 and MM08 that removes the references to the Minerals Infrastructure Safeguarded Areas being periodically reviewed as required in policy text.</p>	<p>No - Change does not affect direction of policy and re-assessment unlikely to return different results.</p>
<p>6. Providing for Minerals - Safeguarding facilities for concrete</p>	<p>Introduction text clarified in relation to brickmaking plant / factory & plasterboard.</p>	<p>No - The proposed alterations are considered to not significantly change the direction of policy and consequently are assessed to be <i>de minimis</i>.</p>

<p>batching (RM6) [MM10]</p>	<p>Reference to Agent of Change added to policy and supporting text.</p> <p>Modification to remove specified facilities and reverting of policy wording to refer to “minerals infrastructure”.</p> <p>Modification to include manufacturing within RM6.</p>	
<p>6. Providing for Minerals - Minerals Consultation Areas (RM7) [MM11]</p>	<p>Additional supporting text providing context and justification in relation to extent of Mineral Consultation Areas.</p> <p>Policy text reworded for clarity; no material change to policy.</p>	<p>No - Policy direction is not changed and re-assessment unlikely to return different results.</p>
<p>7. Development Management Policies - Environment and Environmental Enhancement (RD1) [MM12]</p>	<p>Explanatory text now explicitly refers to the safeguarding of designated areas, local, national and international.</p> <p>Alterations to text of when permission will not be granted and addition of ‘functional habitat’ clause.</p>	<p>Yes - Changes proposed to clarify the handling of soils and definition of functional habitat. Clarification of when the benefits of development can outweigh protected designations added to policy schedule. These alterations could possibly lead to alterations to the outcomes determined in the Sustainability Appraisal.</p>
<p>8. Implementation and Monitoring [MM13]</p>	<p>No significant alterations however amendments to the wording of the original explanatory text and text within the Monitoring Tables.</p>	<p>No - Alterations proposed are very minor and considered to be a <i>de minimis</i> alteration and to have no impact on the Sustainability Appraisal.</p>

5. Updated Assessments

5.1 Further to the assessment undertaken under section 3 of this document, the following assessments have been updated:

- 6. Providing for Minerals - Provision of Aggregates for the Plan Area (RM1) [MM05].
- 6. Providing for Minerals - Safeguarding Mineral Resources (RM3) & Prior Extraction of Mineral Resources (RM4) [MM08].
- 7. Development Management Policies - Environment and Environmental Enhancement (RD1) [MM12].

5.2 The re-assessments were undertaken using the same methodology as set out in Section 5 of the Sustainability Appraisal, (pages 44 - 53).

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 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.
Proposed Main Modifications	<ul style="list-style-type: none"> Main Modifications Re-assessment: Key change(s) - New clause (3) added to policy which allows for the support of new land-won aggregate extraction where any proposal complies with other relevant policies within the Development Plan and does not result in unacceptable adverse impacts. This is intended to address speculative applications; the plan does not include any new allocations.

Assessment

Objectives	Short	Me- dium	Long	Comments	Prob	Dir/Ind	Rev?
1. To Avoid negative effects and enhance positive effects on health.	+	+	+	<p>The provision of minerals indirectly improves human health by enabling the continued development of villages, towns and cities. The 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.</p> <p>Potentially Affected Locations: <u>Urban Areas</u>.</p>	M	I	X
2. To protect the amenity of residents and neighbouring land uses.	+/ -	+/ -	+/ -	<p>The 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.</p> <p>Potentially Affected Locations: <u>Minerals Facilities - Areas near</u>.</p>	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 Plan supports aggregate provision from all sources: recycled, secondary, marine and land-won. 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 use of existing sites and promotion of sustainable transport modes will concentrate traffic movements 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, 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> .	M	I	X
11. To reduce adverse impacts of transporting waste and minerals on the environment.	+/-	+/-	+/-	Existing facilities will enable the continued import of material into the Plan Area. 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	M	D	X

				<p>replaced by supply from the ports and railheads within the Plan Area (Shoreham, Newhaven, and Rye). The Policy supports local supply of minerals, in the event of a speculative proposal, where it meets the policies as set out in the Development Plan. The policy also generally encourages use of sustainable transport of minerals and indirectly supports safeguarding of existing facilities by enabling development within sites.</p> <p>Potentially Affected Locations: <u>Minerals Facilities (in and near Plan Area) - Connecting roads, and areas near connecting roads, Mineral Resources (Unconstrained and Viable) - Areas near.</u></p>			
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.	+	+	+	<p>The use of existing sites should reduce the number of required facilities to be provided elsewhere. Clause three of the policy requires that it meet the other policies within the Development Plan, several of which specifically exist to protect the historic & built environment. 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.</p> <p>Potentially Affected Locations: <u>Plan Area.</u></p>	M	I	X
14. To protect, conserve and enhance East Sussex and Brighton & Hove's biodiversity and geodiversity.	-	-	-	<p>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.</p> <p>Potentially Affected Locations: <u>Licensed & Identified Marine Areas for Aggregate Dredging (Outside of Plan Area).</u></p>	M	I	✓
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	++	++	++	The continued provision of minerals will help support the construction of housing and infrastructure.	H	D	X

sustainable and diversified economy				Potentially Affected Locations: <u>Plan Area</u> .			
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</u> , <u>Port of Rye</u> .	M	I	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. Policy SP8 also 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 RM3 and the assessment below assumes Policies WMP14 and 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.
Proposed Main Modifications	<ul style="list-style-type: none"> Draft Policies RM3 and RM4 merged into an updated version of RM3. Assessment combined and updated. After review, assessment conclusions remain unchanged from assessment of RM3 and RM4.

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.	+	+	+	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
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.	+	+	+	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 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 criterion 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.			

RD1: Environment and Environmental Enhancement

The majority of the 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. Additionally, during the Examination into the Revised Policies additional text in relation to good practice relating to the use of soils and the introduction of a definition of "functional habitat" was added into the supporting text. As this policy has not been subject to SA/SEA at during the formation of the NPPF, and there have been changes since the last assessment, an additional 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.
Proposed Main Modifications	<ul style="list-style-type: none"> Updated assessment arising from proposed Main Modifications involving the clarification of policy, and additional supporting text in relation to the definition of functional habitats and best practice for the use of soils.

Assessment

Objectives	Short	Me- dium	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.	• / ?	• / ?	• / ?	The additional supporting text directing readers to best practice in relation to soils and mineral extraction ensures that the readers / users of the Plan have a clear understanding of current best practice. This is considered to be positive in its overall effect compared with the baseline. However, given the strategy contained within the plan, there will only be limited number of occasions where it could be applied, i.e., the minerals strategy does not allocate any new development, and waste management is mostly directed towards existing sites and land in employment uses. Consequently, the assessment of unknown / uncertain is a more accurate reflection at this time.			
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.	• / ?	• / ?	• / ?	The additional supporting text defining "functional habitat" ensures that the readers / users of the Plan have a clear understanding of what "functional habitat" means. This reflects current best practice and definitions in use, and is considered to be positive in its overall effect compared with the baseline. However, given the strategy contained within the plan, there will only be limited number of occasions where it could be applied, i.e. the minerals strategy is does not allocate any new development, and waste management is mostly directed towards existing sites and land in employment uses. Consequently, the assessment of unknown / uncertain is a more accurate reflection at this time. 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	M	D	X

				<p>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.</p> <p>Potentially Affected Locations: <u>Plan Area</u>.</p>			
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	•	•/ ?	•/ ?	<p>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 provide.</p>	M	D	X
17. To provide employment opportunities and develop and maintain a skilled workforce.	N/A	N/A	N/A	No impacts identified.			

6. Conclusion

- 6.1 Based on the proposed Main Modifications an assessment of if those modifications would require reassessment within the context of the sustainability appraisal. The following policies were identified as requiring reassessment which was then undertaken.
- 6. Providing for Minerals - Provision of Aggregates for the Plan Area (RM1) [MM05].
 - 6. Providing for Minerals - Safeguarding Mineral Resources (RM3) & Prior Extraction of Mineral Resources (RM4) [MM08].
 - 7. Development Management Policies - Environment and Environmental Enhancement (RD1) [MM12].
- 6.2 The updated assessments findings were broadly in line with the original assessments, and no additional significant effects were identified, nor are any additional mitigation measures are recommended. In the context of the Strategic Environment Assessment regulations and Directive, the main conclusions of the Sustainability Appraisal remain unaltered.

7. Next steps

- 7.1 The Waste and Minerals Local Plan Review is currently at the Public Examination stage. During the Public Examination of the Revised Plan Policies modifications were suggested to ensure the soundness and legal compliance of the Plan. The Authorities have now proposed modifications, and these have been submitted to the independent Inspectors for their consideration.
- 7.2 This Sustainability Appraisal Report Addendum has been published for alongside the Main Modifications for consultation. The Inspectors will consider all comments made during that consultation on the proposed Main Modifications and their effect on the legal compliance and “soundness” of the Plan.
- 7.3 Full details of the Waste and Minerals Local Plan Review can be found on [2022B - Examination - Keystone \(objective.co.uk\)](#).

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