

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

Waste and Minerals Local Plan Review
RPD Public Consultation (2020)
11 May 2020 – 3 August 2020
Summary of Responses

August 2021



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About this Document

This is the Summary of Representations to the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan Review Draft Revised Policies Document Consultation 2020. The consultation ran for 12 weeks between 11 May 2020 and 3 August 2020. The consultation was an informal consultation which was run in accordance with Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012. Due to circumstances outside the control of the Authorities', paper documents were not placed at the primary deposit points. Appendix A contains links to the original representations. To protect privacy, email addresses and telephone numbers have been redacted. Further information about the consultation can be found in the Consultation Statement. The Authorities response is also detailed in the Schedule.

DRAFT

Contents

List of Respondents.....	3
Summary of Responses.....	7

DRAFT

List of Respondents

Representation Number	Respondent
R3-001	Internal Test Entry
R3-002	David Collins
R3-003	Shoreham Port
R3-004	East Chiltington Parish Council
R3-005	Sam Jenner
R3-006	Amanda Jobson
R3-007	Marine Management Organisation
R3-008	Gatwick Airport
R3-009	Biffa Waste Services
R3-010	Kier
R3-011	Shuster et al (Petition with 221 Signatories)
R3-012	Wienerberger
R3-013	Alan Potter - Beyond Waste
R3-014	Zoar Chapel
R3-015	Lewes District Green Party
R3-016	Peter Isted
R3-017	Plastic Free Eastbourne CIC
R3-018	Hugh Woodhouse
R3-019	Lesley Healey
R3-020	William Ackroyd
R3-021	Environment Agency
R3-022	Samantha Struthers
R3-023	Jo ODell
R3-024	Brigitte Sutherland
R3-025	Keith Payne
R3-026	Jane Foot
R3-027	Sarah Sawyer
R3-028	Kent County Council
R3-029	Julian Owen
R3-030	Ashford Borough Council
R3-031	Southern Water
R3-032	Network Rail
R3-033	Network Rail (Duplicate)
R3-034	Ibstock Brick Ltd
R3-035	Brett Aggregates
R3-036	Mineral Products Association
R3-037	Roger Smith
R3-038	Crowborough Town Council
R3-039	Linda Grange
R3-040	Deborah Kalinke
R3-041	Rother District Council
R3-042	National Grid
R3-043	The Dudman Group
R3-044	Polegate Town Council
R3-045	Historic England
R3-046	Lewes District Council & Eastbourne Borough Council
R3-047	Ibstock Brick Ltd (Duplicate)

R3-048	Siou Hannam
R3-049	Brett Aggregates
R3-050	VAS Maddison Ltd
R3-051	Mineral Products Association (Duplicate)
R3-052	Marion Thomas
R3-053	Cllr Rob Banks (LDC) & Cllr Sarah Osborne (ESCC)
R3-054	Rebecca Kemsley
R3-055	Martin Meadows
R3-056	Kay Woolner
R3-057	Donna Lonsdale
R3-058	Rosie Phillips-Leaver
R3-059	Wealden District Council
R3-060	David White
R3-061	CPRE Sussex
R3-062	South Downs Society
R3-063	Day Group
R3-064	Hastings Borough Council
R3-065	Sussex Wildlife Trust
R3-066	Woodland Trust
R3-067	Highways England
R3-068	Steve Guthrie
R3-069	West Sussex County Council
R3-070	Natural England

List of Respondents - Alphabetical Order

Representation Number	Respondent
R3-013	Alan Potter - Beyond Waste
R3-006	Amanda Jobson
R3-030	Ashford Borough Council
R3-009	Biffa Waste Services
R3-035	Brett Aggregates
R3-049	Brett Aggregates (Duplicate)
R3-024	Brigitte Sutherland
R3-053	Cllr Rob Banks (LDC) & Cllr Sarah Osborne (ESCC)
R3-061	CPRE Sussex
R3-038	Crowborough Town Council
R3-002	David Collins
R3-060	David White
R3-063	Day Group
R3-040	Deborah Kalinke
R3-057	Donna Lonsdale
R3-004	East Chiltington Parish Council
R3-021	Environment Agency
R3-008	Gatwick Airport
R3-064	Hastings Borough Council
R3-067	Highways England
R3-045	Historic England
R3-018	Hugh Woodhouse
R3-034	Ibstock Brick Ltd

R3-047	Ibstock Brick Ltd (Duplicate)
R3-026	Jane Foot
R3-023	Jo ODell
R3-029	Julian Owen
R3-056	Kay Woolner
R3-025	Keith Payne
R3-028	Kent County Council
R3-010	Kier
R3-019	Lesley Healey
R3-046	Lewes District Council & Eastbourne Borough Council
R3-015	Lewes District Green Party
R3-039	Linda Grange
R3-007	Marine Management Organisation
R3-052	Marion Thomas
R3-055	Martin Meadows
R3-036	Mineral Products Association
R3-051	Mineral Products Association (Duplicate)
R3-042	National Grid
R3-070	Natural England
R3-032	Network Rail
R3-033	Network Rail (Duplicate)
R3-016	Peter Isted
R3-017	Plastic Free Eastbourne CIC
R3-044	Polegate Town Council
R3-054	Rebecca Kemsley
R3-037	Roger Smith
R3-058	Rosie Phillips-Leaver
R3-041	Rother District Council
R3-005	Sam Jenner
R3-022	Samantha Struthers
R3-027	Sarah Sawyer
R3-003	Shoreham Port
R3-011	Shuster et al (Petition with 221 Signatories)
R3-048	Siou Hannam
R3-062	South Downs Society
R3-031	Southern Water
R3-068	Steve Guthrie
R3-065	Sussex Wildlife Trust
R3-043	The Dudman Group
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R3-012	Wienerberger
R3-020	William Ackroyd
R3-066	Woodland Trust
R3-014	Zoar Chapel

Summary of Responses

Biosphere

Rep ID	Comment	Authorities' Response
R3-023	Concern regarding plan effect on Biosphere.	In respect of minerals provision, the RPD relies on the use of existing permitted facilities. No significant effects on the UNESCO Biosphere were identified.

Climate Change

Rep ID	Comment	Authorities' Response
R3-015	The Plan should reflect the Climate Emergency Declarations made by the three Authorities.	Climate change is currently addressed through Policy WMP 24a Climate Change; a review of this policy is not within the scope of this partial review. As set out in the Context section of the plan, it will be the subject of the next full review of the Plan.
R3-015	The revised policies should refer specifically to the goals of the Paris Agreement and ensure that all policies and actions are fully consistent with those goals.	Climate change is currently addressed through Policy WMP 24a Climate Change; a review of this policy is not within the scope of this partial review. As set out in the Context section of the plan, it will be the subject of the next full review of the Plan.

Consultation

Rep ID	Comment	Authorities' Response
R3-039	Consultation should have been longer.	The consultation was conducted over 12 weeks to allow for the unusual circumstances at that time. For this consultation, submissions submitted after the close of the consultation are considered on their merits.

Environment

Rep ID	Comment	Authorities' Response
R3-020	Marine environment should be protected equally to land environment.	The marine environment is subject to both Marine Plans and a number of designations protecting areas of specific environmental interest. Dredging is also subject to a licensing regime which places obligations on the operators in respect of their environmental effects.
R3-039	Two thirds of the Plan Area is subject to environmental protection, whether as part of the SDNP or High Weald AONB plus other areas designated as SPAs, SACs, SSSIs, ancient woodlands etc. The Plan fails to address the secondary impact of mineral and waste development on these areas and rural villages as per the Environment Act 1995. This would have to encompass not only the immediate environment of waste and aggregate infrastructure but also the cumulative impact of construction and extraction traffic on rural roads in the Plan Area. No mention is made of Air Quality Management (AQM) and the effect on the health of residents due to this.	Policy RW1 is intended to direct waste management development away from sensitive areas. RM1 sets out how minerals will be provided. The WMP contains a comprehensive set of development management policies which address topics such as traffic (WMP25) and air quality (WM26).

Excluded development list

Rep ID	Comment	Authorities' Response
R3-063	Applications for removal, variation or approval of conditions should not be on this list e.g. often noise conditions are included on residential developments to ensure they can co-exist with nearby minerals infrastructure. This should be done in consultation with the MPA to ensure infrastructure facilities are not undermined. Similarly, reserved matters application can often lead to changes in layout etc. Example of where this has occurred in at Crawley site and Greenwich Wharf is provided.	Agree. 'Applications for approval, variation or removal of conditions' and 'Reserved Matters' have been removed from the excluded development list.

General

Rep ID	Comment	Authorities' Response
R3-003	No objections to the revisions.	Noted.
R3-010, R3-030	No comments.	Noted.
R3-059	No comments.	Noted.

Local Impact

Rep ID	Comment	Authorities' Response
R3-016	Concern regarding local impact of existing facilities in relation to pollution. (Newhaven)	In respect of minerals provision, the RPD relies on the use of existing permitted facilities. The local effects were a consideration when selecting the approach selected.
R3-023	Concern regarding effect on reputation of town of Plan. (Newhaven)	In respect of minerals provision, the RPD relies on the use of existing permitted facilities. The local effects were a consideration when selecting the approach selected.
R3-023, R3-025, R3-029, R3-040	Concern regarding local impact. (Newhaven)	In respect of minerals provision, the RPD relies on the use of existing permitted facilities. The local effects were a consideration when selecting the approach selected.

Lydd Quarry

Rep ID	Comment	Authorities' Response
R3-049	Not allocating the extension to Lydd quarry would lead to minerals being transported greater distances, and to increased impacts on CO2 emissions.	Lydd quarry is situated on the border between East Sussex and Kent, and therefore the supply area currently extends westwards into Kent and eastwards into the Plan area. In terms of continuing supply to the existing market areas, the Fishers Wharf development at Newhaven could provide for the western side of the Plan Area, and any market variations to the east could be compensated for by, for example, further imports using existing capacity at Rye Harbour as well as from Kent. The exact effect on haulage distances as a result of such changes is unknown. However, the new Fishers Wharf facility at Newhaven will be using a low

		emissions HGV fleet. In addition, the Plan strategy prioritises the use of recycled aggregates which has the potential to further offset CO2 emissions.
R3-063	Day Aggregates operate bagging plant on Kent side of Lydd quarry. High proportion of quarry products are bagged on site and distributed on flat bed lorries in 5kg or 900kg bags for construction and DIY sectors. There is a 50/50 sales split between Kent and East Sussex. The emphasis on consumers requiring materials to be delivered in this way has increased significantly over the last 20 years. BAL have identified viable and proven resources on the boundary of the quarry of approx. 1.96 mt.	Noted
R3-049	Insufficient alternative materials and resources have been identified. Practicable or equivalent sources from other counties also not identified. Sourcing from further afield rather than from Lydd will result in negative environmental and socioeconomic impacts	Disagree that insufficient alternative material has been identified. However more detail is now set out in the Plan and Aggregates Data Technical paper on the import sources and infrastructure which will provide the alternative material.
R3-049	Without an extension resources would be sterilised.	In terms of sterilisation the area promoted as an extension to the quarry is similar to other resources in the area covered by designations. In this case the environmental constraints are considered overriding in terms of future extraction and in therefore sterilisation effectively occurred when the designations were applied. Any sterilisation of the resource is not therefore as a result of non-allocation.
R3-049	Sand and gravel from Lydd quarry, which is currently purchased by the Environment Agency to provide flood defences, is the only source of material that has been identified for local flood defence projects.	Disagree. While Lydd quarry is a cost-effective source of material for the Environment Agency, it is not the only source available. The Environment Agency have also confirmed that marine dredged aggregate can be used in place of land-won for flood defence works.
R3-049	Disagree with the apportionment calculation which doesn't accord with NPPF.	Disagree -The Plan area has a long-standing unique and particular land - won aggregate situation which has been recognised as a "special case". Lydd quarry is the only active sharp sand and gravel site in the Plan Area, and the operator's established arrangement here is that 50% of material produced is exported to Kent. The LAA

		rate is therefore adjusted to reflect local circumstances.
R3-034	lbstock use sand from Lydd quarry as predominantly as a facing material in brick manufacture. In 2019 Lydd sand was used on 57 million bricks. Concern therefore that supply will not continue. Supports further land won extension to provide security of supply, and not MDA which would not be suitable.	While it is not disputed that the Lydd sand may have qualities that differentiate it from other sands in terms of appearance, it is considered that alternative sands can perform the exact same technical tasks as Lydd sands, and can produce the same standard of bricks and other construction aggregate.
R3-012	Brick manufacturer Wienerberger use material from Lydd quarry at 3 of their plants. WMLP does not consider the contribution of material from the site is recognised for brick manufacture in the region and sufficient resources should be identified for short and long term demand. Support an extension to Quarry to meet further demand.	While it is not disputed that the Lydd sand may have qualities that differentiate it from other sands in terms of appearance, it is considered that alternative sands can perform the exact same technical tasks as Lydd sands, and can produce the same standard of bricks and other construction aggregate.
R3-049	Marine dredged aggregate and Land-won material are not fully interchangeable. lbstock and Weinerberger have stated that many of their products cannot be produced by using an alternative sand or marine dredged sand due to the chloride impact, and that the sand from Lydd quarry is unique and a critical component in their brick-making.	Disagree. The Crown Estate has advised the Authorities that marine aggregate is wholly interchangeable with land based sand and gravel, and can perform the same technical tasks. It is routinely used in the production of ready mixed concrete and mortar in markets where it is imported. The presence of chloride and shell is effectively managed by producers and neither presents any technical issues. While it is not disputed that the Lydd sand may have qualities that differentiate it from other sands in terms of appearance, it is considered that alternative sands can perform the exact same technical tasks as Lydd sands, and can produce the same standard of bricks and other construction aggregate.
R3-049	Lydd sand has unique properties vital to certain brick manufacturing processes that cannot be substituted by recycled or MDA	Disagree. The sand has not been identified in any previous planning applications for Lydd quarry where permission was granted for aggregate as a construction material. While it is not disputed that the Lydd sand may have qualities that differentiate it from other sands in terms of appearance, it is considered that alternative sands can perform the exact same technical tasks as Lydd sands, and can produce the same standard of bricks and other construction aggregate.

R3-049	Lydd quarry is important to the local economy and allocating an extension at Lydd quarry will safeguard jobs and provide stability at a time of economic uncertainty in the local area. 50 jobs could be affected without an extension.	While there may be some impact on employment within the local area of Lydd, given that minerals infrastructure activity will continue in the Plan Area, minerals-related jobs will still be required in the wider area and in the Plan Area as a whole. In addition, information submitted as part of planning permission LW/799/CM(EIA) for the new Fishers wharf facility in Newhaven indicated that circa 100 new jobs would be created at the site, as well as 74 new full time equivalent jobs in East Sussex after accounting for scheme additionality and wider multiplier effects.
R3-049	An extension would provide an opportunity for nature restoration plans, biodiversity net gain and offsetting.	The quarry and wider vicinity lies with of an area of significant environmental importance. There may well be opportunities to enhance the habitat and biodiversity; indeed this is the objective of the existing approved restoration plans for the quarry. However, further working of adjoining areas is not a requirement to increase biodiversity.
R3-049	Lydd material requires rounded pebbles which are required for roof dressing	The pebbles have not been identified in any previous planning applications for Lydd quarry where permission was granted for aggregate as a construction material. The regional uniqueness of these flint pebbles to the Dungeness deposits is unknown, but as Lydd is a storm beach mineral deposit it is likely that much of the material shares similarities with deposits along the south coast of England. It is considered therefore that other sources of pebbles for roof dressing will be available from sources elsewhere.
R3-049	Disagree that SSSI designation rules the extension site out.	Disagree - the Authorities have taken the advice of Natural England regarding the potential impact of extracting aggregates from the extension site (promoted by the operators), and considered the proposal in the context of the NPPF. The Authorities consider that mineral working at this site could not be supported due to the significant harm it would cause to the interests of the designated areas. As alternative sources of material exist which can supply the Plan Area, and as these have lesser environmental effects, the Authorities are satisfied that there are no overriding

		reasons why an allocation for aggregate working at this site should be included in the Plan.
R3-049	ESCC are grossly underestimating the demand forecast for aggregates requirement over the Plan period. Predicted housing numbers will require all of this, leaving no support for commercial, industrial, infrastructure and repair & maintenance and the County struggling to find materials to support development.	Disagree. Details on how the Authorities have calculated provision is set out in the Aggregates Data Technical paper. This demonstrates that an assessment of potential demand has been undertaken and provision calculated accordingly.
R3-049	ESCC have not produced a needs and alternatives document.	There is no requirement for the Authorities to produce a specific document on this matter. The Plan review and associated documents set out information and evidence supporting the proposed aggregates strategy. This includes an assessment of the potential demand (need) for aggregates over the plan period, and an examination of the alternative materials available and how they can supply the Plan Area.

MSA/DIT (SAND); MSA/DIT [STA].

Rep ID	Comment	Authorities' Response
R3-004	Nuisance at Novington Sandpit	The Authorities note the comments in relation to disturbance at Novington Sandpit. Enforcement action is taken where it is expedient and related to the planning permissions at the site.
R3-004	Concern that safeguarding of soft sand resource is preventing a solution to lack of development on the site	Safeguarding resources is required by national policy. Safeguarding does not mean that the resource will be or should be worked out. There is a scheme for restoration of the site at Novington Sandpit that must be complied with once extraction has taken place, in accordance with the current planning permission.
R3-004	Concern over viability of extraction at Novington Sandpit	A revised timescale for the consent at Novington Sandpit was recently permitted which indicates that the operator believes extraction will take place. There is a shortage of soft sand across the South East.

MSA/DIT [STA]

Rep ID	Comment	Authorities' Response
R3-053	Concern that RD1 is not strong enough to deal with current issues at Novington Sand-pit	The operator at Novington Sandpit must comply with the current planning permission which allows further time for extraction of sand and includes an appropriate restoration scheme. RD1 will require further assessments to accompany any planning permission that comes forward for further extraction within the Plan Area.

Minerals

Rep ID	Comment	Authorities' Response
R3-011, R3-019, R3-022, R3-023, R3-024, R3-025, R3-027, R3-029, R3-039, R3-048, R3-052, R3-054, R3-055, R3-056, R3-057, R3-058, R3-060, R3-068	Plan should prioritise recycled aggregate over virgin production.	This is achieve in the WMLP by Policy WMP4 .
R3-015	Disagree with Plan's focus on new virgin aggregates. Recycled aggregates should replace MDA which are environmentally damaging. Policy should remove import of MDA & promote recycled aggregate along with revised targets	The Plan strategy for aggregates provision is to provide alternatives to land-won aggregates such as recycled and secondary aggregates as well as imports. Whilst there are limitations to the contribution that recycled materials can make to overall supply due to specifications and volumes of CDEW needed as feedstock a new policy now clarifies that the use of recycled and secondary aggregate will be prioritised over virgin materials. Plan text has also been amended to emphasise the contribution that recycled and secondary materials can make to provision. The environmental impact of dredging for aggregates is considered at the application stage of the Marine Licencing system which is determined by the Marine Management Organisation (MMO). The adopted South Marine Plan prepared by the MMO, sets out environmental policies and criteria and is used in the decision making process. Under the regulatory consent process, an Environmental Impact Assessment (EIA) is required, which includes a Coastal Impact

		Study. The MMO consult and engage with bodies including Natural England, Centre for Environment, Fisheries and Aquaculture Science, the Joint Nature Conservation Committee and Historic England to ensure any concerns are identified. Conditions are applied to marine licenses such as, for example, seasonal restrictions for dredging. The Authorities consider that MDA makes an important contribution to the Plan's provision strategy.
R3-011, R3-019, R3-022, R3-023, R3-025, R3-027, R3-029, R3-048, R3-052, R3-054, R3-055, R3-056, R3-057, R3-058, R3-060, R3-068	Plan should not seek to promote minerals processing capacity at existing minerals sites.	In order to ensure that the best use and most sustainable use of land is made, intensification of existing uses is often preferable to alternative provision. Options assessed are set out in the Sustainability Appraisal.
R3-064	Plan should prioritise recycled aggregate over virgin production.	The broad strategy in relation to minerals does this, as set out in WMP4
R3-041	Note that reliance is to be placed on imported materials including via Rye Port. Not aware of any significant barriers to this approach for Rye wharves, but both Highway authorities are involved in discussions about potential impact of additional traffic on Harbour Road and junction with A259. If improvements needed (from more wharf traffic) might be necessary to provide for the cost contribution of this in policies.	Noted. There is currently additional permitted capacity at Rye Port which could be utilised using permitted development rights and which therefore would not be subject to traffic controls. In the event that further capacity were proposed traffic impacts would be considered at the planning application stage and other Plan policies would apply including WMP 26. Cost contributions are not considered to be a major issue in this case and no reference is required in the policy.
R3-060	Need targets on reducing waste and recycling. Recycle construction waste into aggregates and substitute for virgin materials. MDA are highly damaging to the environment. Against more processing capacity at Newhaven which is damaging to the area and marine environment.	Recycled aggregates are promoted and targets are in WMP. The Plan strategy for aggregates provision is to provide alternatives to land-won aggregates such as recycled and secondary aggregates as well as imports. There are limitations to the contribution that recycled materials can make to overall supply due to specifications and volumes of CDEW needed as feedstock. However a new policy now clarifies that the use of recycled and secondary aggregate will be prioritised over virgin materials. Plan text has also been amended to emphasise the contribution that recycled and secondary materials can make to provision. The environmental impact of dredging for aggregates is considered at the

		<p>application stage of the Marine Licencing system which is determined by the Marine Management Organisation (MMO). The adopted South Marine Plan prepared by the MMO, sets out environmental policies and criteria and is used in the decision making process. Under the regulatory consent process, an Environmental Impact Assessment (EIA) is required, which includes a Coastal Impact Study. The MMO consult and engage with bodies including Natural England, Centre for Environment, Fisheries and Aquaculture Science, the Joint Nature Conservation Committee and Historic England to ensure any concerns are identified. Conditions are applied to marine licenses such as, for example, seasonal restrictions for dredging. The Authorities consider that MDA makes an important contribution to the Plan's provision strategy. Any proposals for additional processing capacity would be considered under WMLP policies which include environmental safeguards.</p>
R3-052	<p>Concerned that storage marine dredged aggregates could have a detrimental effect on the adjacent river.</p>	<p>PR Comment??</p>
R3-064	<p>Wish the opportunity for minerals to be re-used/recycled as a priority over new mineral extraction</p>	<p>The Plan strategy for aggregates provision is to provide alternatives to land-won aggregates such as recycled and secondary aggregates as well as imports. There are limitations to the contribution that recycled materials can make to overall supply due to specifications and volumes of CDEW needed as feedstock. However a new policy now clarifies that the use of recycled and secondary aggregate will be prioritised over virgin materials. Plan text has also been amended to emphasise the contribution that recycled and secondary materials can make to provision.</p>
R3-018	<p>Queries the responsibility of extracting building materials from seabed, and why builders waste can't be reused rather than landfilled.</p>	<p>The Plan strategy for aggregates provision is to provide alternatives to land-won aggregates such as recycled and secondary aggregates as well as imports. Whilst there are limitations to the contribution that recycled materials can make to overall supply, due to specifications and volumes of CDEW needed as feedstock, a new policy now clarifies that the use of recycled and secondary aggregate will be prioritised</p>

		<p>over virgin materials. Plan text has also been amended to emphasise the contribution that recycled and secondary materials can make to provision. The environmental impact of dredging for aggregates is considered at the application stage of the Marine Licencing system which is determined by the Marine Management Organisation (MMO). The adopted South Marine Plan prepared by the MMO, sets out environmental policies and criteria and is used in the decision making process. Under the regulatory consent process, an Environmental Impact Assessment is required, which includes a Coastal Impact Study. The MMO consult and engage with bodies including Natural England, Centre for Environment, Fisheries and Aquaculture Science, the Joint Nature Conservation Committee and Historic England to ensure any concerns are identified. Conditions are applied to marine licenses such as, for example, seasonal restrictions for dredging. The Authorities consider that MDA makes an important contribution to the Plan's provision strategy.</p>
R3-011, R3-019, R3-022, R3-023, R3-024, R3-025, R3-027, R3-029, R3-048, R3-052, R3-054, R3-055, R3-056, R3-057, R3-058, R3-060, R3-068	The importation of marine dredged aggregates is damaging to the environment.	The marine environment is subject to both Marine Plans and a number of designations protecting areas of specific environmental interest. Dredging is also subject to a licencing regime which places obligations on the operators in respect of their environmental effects.
R3-020	It is suggested that a substantial part of requirements for construction can be met by recycling and this is the approach that needs to be taken. (Promoting recycled aggregates).	The amount of recycled aggregate that could be produced and used was a factor when calculating the amount of aggregate required. See WMP4 for broad approach.
R3-046	Amount of CDEW needs to be reduced in order to increase sustainability and address the climate emergency. Need an increased emphasis on circular economy and reuse/recycling of construction waste materials.	The Plan strategy for aggregates provision is to provide alternatives to land-won aggregates such as recycled and secondary aggregates as well as imports. There are limitations to the contribution that recycled materials can make to overall supply due to specifications and volumes of CDEW needed as feedstock. However a new policy now clarifies that the use of recycled and secondary aggregate will be prioritised over virgin materials. Plan text has also been amended to emphasise the

		contribution that recycled and secondary materials can make to provision.
R3-032	Network Rail would welcome engagement to explore further opportunities for rail-head developments	Noted
R3-052	Advocates reducing CDEW waste to produce more recycled aggregates. Waste and minerals parts of the Plan are not joined up. Importing MDA is damaging to the environment. Could storage of MDA damage the Ouse?	The Plan strategy for aggregates provision is to provide alternatives to land-won aggregates such as recycled and secondary aggregates as well as imports. There are limitations to the contribution that recycled materials can make to overall supply due to specifications and volumes of CDEW needed as feedstock. However a new policy now clarifies that the use of recycled and secondary aggregate will be prioritised over virgin materials. Plan text has also been amended to emphasise the contribution that recycled and secondary materials can make to provision. Any application for storage of MDA would be considered in the context of Development Plan policies including environmental protection policies in the WMLP.
R3-020	Provision of Minerals and Minerals Safeguarding (general) policies contradict each other.	The minerals provision and minerals safeguarding policies compliment each other to ensure adequate minerals provision.

Minerals, Monitoring, Pg52

Rep ID	Comment	Authorities' Response
R3-039	table references WMP4 which I have not been able to find. The delivery targets are: A proportional increase in use of secondary or recycled materials in relation to total minerals used. Sufficient primary and secondary aggregates provided to the Plan Area over plan period However, these are soft targets and there is no qualitative or quantitative information about what these are and how they would be achieved.	The Revised Policies Document amends the WMP and WMSP. WMP4 can be found in the WMP. The estimated amount of aggregates required is set out in the text supporting policy RM1.

Minerals, Para 3.31

Rep ID	Comment	Authorities' Response
R3-039	Is there any information on the ratio of DSG used versus gypsum? As the supply of DSG as a by-product of coal fired power	The last information provided by British Gypsum indicates that very little is being extracted from the gypsum mine at this

	stations is likely to decrease, will this impact the demand on Robertsbridge resources?	time, using DSG in its place. Should there be a reduction in the available DSG, there is a large reserve of gypsum in the permitted mine.
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Minerals, Para 3.99

Rep ID	Comment	Authorities' Response
R3-039	The SEEAWP guidance on the production of LAAs has not yet been published, would it not make more sense to wait until this is available? Would there be later changes as a result of this guidance?	The Local Aggregate Assessment is prepared annually by every Minerals Planning Authority. The updated guidance is unlikely to have a significant effect on the content of the Revised Policies Document.

Minerals, Recycled Aggregate

Rep ID	Comment	Authorities' Response
R3-015	Support promotion of recycled aggregates.	Noted.

New policy requested

Rep ID	Comment	Authorities' Response
R3-008	Plan should include new policy in relation to safeguarding aerodromes, (suggested policy wording provided).	Given the likely quantum, location and nature of minerals and waste development within the WMLP, aerodrome safeguarding is unlikely to be a relevant consideration in a large proportion, if any, of the anticipated future planning applications. For the limited cases where aerodrome safeguarding is a consideration, it would be a material consideration and considered in line with the NPPF Para 204 & 205 and NPPW Appendix B. NPPF states Plans should unnecessarily not repeat the content of the NPPF / NPPW. The Authorities, therefore, do not propose to include a specific policy in relation to aerodrome safeguarding, but will include the extents of the safeguarded area with references to the relevant NPPF paragraphs on the policy map.

Newhaven

Rep ID	Comment	Authorities' Response
R3-039	Newhaven seems to be particularly badly hit by increased demand and there is understandably a lot of local concern.	Noted.

Pollution, Newhaven

Rep ID	Comment	Authorities' Response
R3-037	Concerned about pollution levels (Newhaven)	Noted - The Plan as proposed does not propose additional development beyond that which is already permitted.

Other

Rep ID	Comment	Authorities' Response
R3-024	Plan conflict with Newhaven Town Plan (Neighbourhood Plan) objective to promote town for green tourism.	The Port of Newhaven was excluded from the Newhaven Town Plan (Neighbourhood Plan) due to its strategic nature, as a port and location of minerals and waste management operations.
R3-056	You need to pay attention to Newhaven residents.	Noted.
R3-020	Supports comments made in R3-011.	Noted.
R3-057	The comment 'build something no one wants and put it in Newhaven' pretty well sums up your attitude to what is also a historical residential coastal Town with unacceptable levels of air pollution and respiratory illness, it is not an industrial estate.	Noted.
R3-058	Can Newhaven Town centre have its recycling bins back?	Lewes District Council's Streets Team are responsible for the provision of those bins. They have informed the Authorities that due to the prevalence of commercial waste, contamination, and especially fly-tips, LDC were forced to decommission the Bring Banks. Fly-tips have decreased drastically in the areas where we removed the fly-tips, and since every residence in the District now has access to Kerbside

		Household Recycling Collection, LDC do not plan to reopen them.
R3-039	The document is highly specialised and not comprehensible in general to residents who do not have any specialist expertise in these areas. There are too many referenced documents and related policies.	Noted.
R3-023	Policies should seek to make Newhaven a small, lovely, fishing port that people would love to visit and be proud to live in.	The WMLP is required to ensure the adequate provision of minerals and waste management. The WMLP seeks to do this in the most sustainable way.
R3-023	Plan should seek to improve reputation of Newhaven.	Noted.
R3-054	Issues with noise pollution at East Quay, Newhaven.	Concerns regarding noise from specific developments should be brought to the attention of the relevant planning and environmental health officers, to establish if there has been a breach of any regulation / planning conditions.
R3-068	Developments should be subject to a sustainability audit.	WMP3d
R3-006	Plan should promote greener infrastructure.	Policy WMP1 promotes sustainable development in general, and Policies WMP24a and WMP24b seek to address the topic of climate change adaptation. Policy RD1 now promotes biodiversity net-gain, and references to the Local Nature Recovery Strategy.
R3-024	Plan should not seek to promote minerals processing capacity at existing minerals sites in Newhaven.	In order to ensure that as much aggregate can be recycled and used as possible, it is important to enable the provision of such infrastructure at existing minerals sites where it does not exist.
R3-057	Please consider the residents living around the waste sites.	Policy WMP25 General Amenity is a consideration when determining planning applications that may affect others.
R3-068	Development should only be permitted if it is sustainable.	The WMLPs commitment to sustainable development is set out in WMP1.

Overarching Strategy

Rep ID	Comment	Authorities' Response
R3-015	Support RPD Overarching Strategy	Noted.

Typographical Errors

Rep ID	Comment	Authorities' Response
R3-041	Typographical error - Paragraph 3.24 mentions the Dungeness, Romney Marsh and Rye Bay SPA, SAC and SSSI, but it should be noted there is also a Ramsar site, and the designated area stretches far beyond Lydd Quarry.	Noted.
R3-039, R3-041	Typographical error - At paragraph 6.33 "conversation areas" should be "conservation areas".	Noted.

Plan

Rep ID	Comment	Authorities' Response
R3-019	Objects to whole plan.	Noted.
R3-011, R3-022, R3-023, R3-024, R3-025, R3-026, R3-027, R3-029, R3-048, R3-052, R3-054, R3-055, R3-056, R3-057, R3-058, R3-060, R3-068	Objects to whole plan.	Noted.

Policies Map

Rep ID	Comment	Authorities' Response
R3-042	Maps for Ninfield and Aldershaw Farm safeguarded sites are crossed or in close proximity to National Grid Assets.	The National Grid Assets have been previously considered in the site assessments for the Sites Plan (2017).

RD1

Rep ID	Comment	Authorities' Response
R3-007	Recommend reference to Objective 8: Heritage assets of the South Marine Plan and Policy to S-BIO-2, which refers to proposals that incorporate features that enhance or facilitate natural habitat and species adaptation, migration and connectivity will be supported.	References to the South Marine Plan and its policies have been added to the Plan. The policies of the South Marine Plan should be considered in the determination of planning applications where relevant.
R3-061	We believe that Policy RD1 should also be expanded in the light of the climate emergency declared by the Local Authorities and be made more comprehensive. So, specifically, we have suggested additions. These are designed to: highlight the three elements of planning policy; ensure all possible mitigation measures are taken against possible adverse impacts of development; make it clear that any proposal has to clearly demonstrate how it will succeed in reducing any impact on climate change; ensure there is a reference to the conservation and enhancement of heritage assets and landscape character, as your text suggests but your draft policy RD1 does not; safeguard all matters relating to water resources in the overall area affected by the proposal; ensure that the proposal sits well within the area it is sited; strengthening the possible reasons for refusing an application in particular for reasons of cumulative impact; re-paragraphing and numbering the wording to add clarity of interpretation and removal of confusing reference to paragraph 'a'.	??
R3-036	In order to deliver clauses b) and c) of the Policy will require permission for new land-won reserves and associated site management and restoration. Through allocating site(s) for extraction, and subsequent restoration, the Plan could enable this and thus deliver this policy. In the absence of such an allocation, these clauses of the Policy will not be implemented.	Policy RD1 is a "Development Management" policy which to be applied to all development as relevant.
R3-046	The proposal to require waste and minerals development to seek to achieve net gain in biodiversity is welcomed.	Noted.

R3-065	It is also a clear requirement within the current SDNP Local Plan to assess the impacts of development on Ecosystem Services (Policy SD2). We therefore suggest that the waste and minerals plan review makes it clear if this is also requirement within the waste and minerals plan, especially for those proposals within the SDNP.	The WMLP forms part of the development plan, along side the SNDP Local Plan in the relevant part of the SDNPA. All relevant policies in the development plan should be considered in the determination of a planning application. Cross referencing between plans beyond at a high level is not generally included to avoid inconsistencies when one or more plans change.
R3-041	It is noted that the policy wording of Policy RD1 (Environment and Environmental Enhancement) has changed from the draft document, and part (a) (first part of the policy) now gives blanket protection to designated sites, as defined in footnote 15. It is suggested that the reference to the “hierarchy of designations” included in the previous (draft) version of Policy RD1 should be reintroduced, to give some further clarity to the differing levels of protection afforded to the designated sites, the list of which includes (but does not define) those which are internationally protected, down to local designations. It is also suggested that for ease of use, the list of designated sites is reproduced at footnote 15 rather than referring to the Local Plan Policies Map. Consideration should also be given to whether the second part of the policy (part a) strictly accords with the NPPF as it refers only to international sites whereas the NPPF (paragraph 175) also gives similar protection to SSSIs and irreplaceable habitats (including ancient woodland).	The designated sites are now listed by their status in Appendix 2. Policy and supporting text now references tests in NPPF, including how the term significant should be interpreted. Policy is currently worded so that any development having an unacceptable significant impact on any designation should not be permitted.
R3-070	Propose alterations to wording of policy and supporting text.	Noted - Policy and supporting text have been revised to reflect the NPPF more closely.
R3-065	SWT agrees that policy WMP27 needs to be reviewed in light of the changes in the NPPF and the legal advice around Habitat Regulation Assessments. However, we do not feel that the new policy and supporting text reflects the changes in the NPPF sufficiently. In particular, the requirements of paragraphs 170, 171 and 175 i.e. the need to provide net gains to biodiversity, plan for the enhancement of natural capital, safeguard components of local wildlife-rich habitats and wider ecological	Noted - Policy and supporting text have been revised to reflect the NPPF more closely.

	networks and promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species. [Specific requested amendments to policy are detailed in rep].	
R3-028, R3-045, R3-062	Support for policy.	Noted.
R3-021	Support update to policy to include reference to net-gain in biodiversity.	Noted.
R3-039	It is stated that measures for protecting and minimising disturbance to soils should be included in an Environmental Statement, this should be made mandatory.	Where soil disturbance occurs the applicant will have to provide sufficient information in order to address Policy RD1.

RM1

Rep ID	Comment	Authorities' Response
R3-063	The strategy adopted for the provision of sand and gravel within the Plan is objected to on the basis that it is not considered to meet the tests of soundness	Disagree. Supporting evidence for the strategy is out in the Plan and the Aggregates Data Technical Paper.
R3-063	Due to errors in calculations and assumptions made, aggregate demand has been underestimated and both Day Group and BAL have identified that there will be a significant shortfall over the plan period.	Disagree. Details on how the Authorities have calculated provision is set out in the Aggregates Data Technical paper. This demonstrates that an assessment of potential demand has been undertaken and provision calculated accordingly.
R3-036	The failure of the Plan to make provision for land-won aggregate would have significant economic implications and would risk supply to the eastern part of the Plan Area.	Disagree. Any market variations to the east of the Plan Area could be compensated for by, for example, further imports using existing capacity at Rye Harbour, as well as from Kent. The Authorities consider that if necessary the market could also respond to demand by, for example, diverting exports.
R3-063	Recycled aggregates will not make a significant contribution to displacing sand and gravel. Quotes a British Geological Survey factsheet saying that: it is likely that "...the major proportion of future aggregates demand will be supplied from primary sources because there are limitations	Details on how the Authorities have calculated provision from recycled and secondary (R&S) aggregates is set out in the Aggregates Data Technical paper. This demonstrates that an assessment of potential capacity has been undertaken and provision calculated accordingly. Whilst the Plan prioritises R&S aggregates over virgin material it recognises that this source will

	to the availability of material to be recycled into aggregates”.	supplement supply and not provide a complete alternative to primary material.
R3-036	Plan should provide for minerals in accordance with the NPPF in terms of: planning for a steady and adequate supply of aggregates by maintaining landbanks of at least 7 years for sand and gravel; use landbanks as an indicator of the security of supply; providing for the extraction of mineral resources of local and national importance and making provision for land-won and other elements of their LAA in their mineral plans.	The Plan area has a long-standing unique and particular land-won aggregate situation which has been recognised as a "special case". Lydd quarry is the only active sharp sand and gravel site in the Plan Area and previous extraction has taken place in the adjoining county. The only other land-won soft sand site has been inactive for a number of years. It has therefore not been possible to use past sales data and a corresponding landbank as indicators, and it is consequently not appropriate to base future provision on the NPPF criteria in this case. Details on how the Authorities have calculated provision is set out in the Aggregates Data Technical paper. This demonstrates that an assessment of potential demand has been undertaken and provision calculated accordingly.
R3-062	Supports strategy for imports, MDA and recycled. Pleased to see that full consideration has been given to soft sand in para's 6.12-24.	Support welcomed
R3-036	Confusing supporting text - would be better to reproduce calculations from LAA. Disagree with halving of LAA rate as 50% material travels to Kent and notes that Kent CC have not adjusted their provision figure accordingly. Providing for "consumption" should actually be providing for "supply".	Disagree -The Plan area has a long-standing unique and particular land-won aggregate situation which has been recognised as a "special case". Lydd quarry is the only active sharp sand and gravel site in the Plan Area, and the operator's established arrangement here is that 50% of material produced is exported to Kent. The LAA rate is therefore adjusted to reflect local circumstances. Details on how the Authorities have calculated provision is set out in the Aggregates Data Technical paper. This demonstrates that an assessment of potential demand has been undertaken and provision calculated accordingly.
R3-036	The reference to East Sussex being recognised as a 'special case' is no longer valid or appropriate.	Disagree. During the review process for the Secretary of State's Proposed Changes to the Review of Policy M3 of the South East Plan the Authorities requested to be treated as a special case. This recognised the particular circumstances of low production; remote reserves; and high dependence on marine landings; in an area largely affected by environmental

		constraints/designations. These circumstances remain for the Plan Area and so it is appropriate to continue considering the Plan strategy in this context.
R3-063	ESCC will not be able to meet the demand for aggregates through the Plan period in a sustainable way without further land resources being allocated.	The Aggregates Data Technical Paper sets out the detail of capacity and alternative sources which can make provision for the Plan period.
R3-028	Supports policy as an evidenced approach to the provision of sharp sand and gravel (or alternatives) needs of the Plan area. However considers that approach to soft sand provision is not specified and lacks understanding of need. Suggests using similar metric as with sharp sand and gravel based on estimated growth	There is a lack of available soft sand resource within the Plan Area. There has been no extraction from the only permitted site for some time and it is understood that the need has been met through imports from West Sussex and Kent. The Authorities have a Statement of Common Ground with those Plan Areas, setting out a joint approach to planning for soft sand.
R3-043	Policy should be clarified - "aggregate material" should be termed as "sharp sand and gravel" as no account has been taken account of the demand for soft sand. Future supply of soft sand should clarified with reference to the proposed "safeguarding" policy	The reference to "aggregate material" includes both sharp sand and gravel and soft sand land-won, marine-dredged and recycled and secondary material. The soft sand resource has been safeguarded in accordance with national policy. There is a lack of available soft sand resource within the Plan Area. There has been no extraction from the only permitted site for some time and it is understood that the need has been met through imports from West Sussex and Kent. The Authorities have a Statement of Common Ground with those Plan Areas, setting out a joint approach to planning for soft sand.
R3-063	The assessment of the effects of an extension to Lydd Quarry on the SSSI have not been fully or robustly assessed and no regard has been had to the potential for mitigation and how this could be addressed at planning application stage.	Disagree - the Authorities have taken the advice of Natural England regarding the potential impact of extracting aggregates from the extension site (promoted by the operators), and considered the proposal in the context of the NPPF. The Authorities consider that mineral working at this site could not be supported due to the significant harm it would cause to the interests of the designated areas. As alternative sources of material exist which can supply the Plan Area, and as these have lesser environmental effects, the Authorities are satisfied that there are no overriding reasons why an allocation for aggregate

		working at this site should be included in the Plan.
R3-036	Concern that no planned provision for land-won despite high quality resources in Lydd area.	The Authorities consider that the environmental constraints in the Lydd area are overriding and there are no options for land won in the Plan Area. The provision strategy is therefore based on supply from recycled and secondary aggregates and imports of marine dredged and other aggregates into the Plan Area.
R3-070	Welcome the non inclusion of an extension to Lydd quarry which will ensure that the international and national designations for biodiversity and geomorphology are conserved.	Noted
R3-063	The omission of a policy that allows for a quarry extension to Lydd is not sound.	Disagree. The Authorities consider that mineral working at this site could not be supported due to the significant harm it would cause to the interests of the designated areas. As alternative sources of material exist which can supply the Plan Area, and as these have lesser environmental effects, the Authorities are satisfied that there are no overriding reasons why an allocation for aggregate working at this site should be included in the Plan. The Aggregates Data Technical Paper sets out the detail of capacity and alternative sources of material which can make provision for the Plan period.
R3-063	NPPF requirements in terms of: planning for a steady and adequate supply of aggregates by maintaining landbanks of at least 7 years for sand and gravel; providing for the extraction of mineral resources of local and national importance and making provision for land-won and other elements of their LAA in their mineral plans have not been complied with.	Disagree. The Plan area has a long-standing unique and particular land-won aggregate situation which has been recognised as a "special case". Lydd quarry is the only active sharp sand and gravel site in the Plan Area and previous extraction has taken place in the adjoining county. The only other land-won soft sand site has been inactive for a number of years. It has therefore not been possible to use past sales data and a corresponding landbank as indicators, and it is consequently not appropriate to base future provision on the NPPF criteria in this case. Details on how the Authorities have calculated provision is set out in the Aggregates Data Technical paper. This demonstrates that an assessment of potential demand has been

		undertaken and provision calculated accordingly.
R3-034	Failed to take account of the proven market for land won aggregates out of Lydd quarry averaging 315 000 tonnes in 18/19 with evidence of higher production in previous years.	Disagree. The production figures for Lydd quarry have been taken account of in the Authorities' Local Aggregate Assessment and the Aggregates Data Technical Paper.
R3-063	The assertion that "marine aggregate is wholly interchangeable with land based sand and gravel" is incorrect. There are many examples of unique properties of land based mineral that cannot be replicated, including Lydd gravels and fine washed sands which are irreplaceable in certain applications.	Disagree. The Crown Estate has advised the Authorities that marine aggregate is wholly interchangeable with land based sand and gravel, and can perform the same technical tasks. It is routinely used in the production of ready mixed concrete and mortar in markets where it is imported. The presence of chloride and shell is effectively managed by producers and neither presents any technical issues. While it is not disputed that the Lydd sand may have qualities that differentiate it from other sands in terms of appearance, it is considered that alternative sands can perform the exact same technical tasks as Lydd sands, and can produce the same standard of bricks and other construction aggregate.
R3-036	Newhaven imports would not be an effective substitute for Lydd material and Rye Harbour imports would not compensate for variations in the east.	Disagree. In terms of continuing supply to the existing market areas, the Fishers Wharf development at Newhaven could provide for the western side of the Plan Area, and any market variations to the east could be compensated for by, for example, further imports using existing capacity at Rye Harbour, as well as from Kent. The Authorities consider that if necessary the market could also respond to demand by, for example, diverting exports.
R3-036	Many of the assumptions made in the Plan (capacity of wharves and potential for increased landings of marine dredged aggregate, viability and likelihood materials would be transported to serve the market area, suitability of alternative sources) are unproven. The apparent total reliance on a large increase in marine dredged aggregates and imports and failing to provide for the land-won element of the LAA the Plan is not sound.	Disagree. Details of capacity and infrastructure and how alternatives to land-won can provide for supply over the plan period is set out in the Aggregates Data Technical Paper.

R3-036	<p>The Explanation that an extension to Lydd is considered unacceptable due to harm to the interests of designated sites (SSSI) requires further consideration and re-evaluation. The area of extension promoted by the operator at Lydd only covers a small percentage of SSSI and is geomorphological not biological interest.</p>	<p>Disagree - the Authorities have taken the advice of Natural England regarding the potential impact of extracting aggregates from the extension site (promoted by the operators), and considered the proposal in the context of the NPPF. The Authorities consider that mineral working at this site could not be supported due to the significant harm it would cause to the interests of the designated areas. Natural England have advised that any proposed loss of SSSI, regardless of the size of the area, would be unacceptable and would have to be subject to an examination of alternative sources. As alternative sources of material exist which can supply the Plan Area, and as these have lesser environmental effects, the Authorities are satisfied that there are no overriding reasons why an allocation for aggregate working at this site should be included in the Plan. Natural England have also advised that in addition to the direct impacts to the geomorphological interest of the SSSI, the proposal would be likely to have direct and indirect impacts on the biological features of the SSSI. The Dungeness Romney Marsh and Rye Bay SSSI has a number of features including a number of ecological interest features. The potential impact of the proposal could damage more than one feature in the SSSI irrespective of what the feature is, be it geomorphological or biological. These are features of national importance.</p>
R3-036	<p>Closure of Lydd quarry would have an in/direct impact on the economy via job losses.</p>	<p>While there may be some impact on employment within the local area of Lydd, given that minerals infrastructure activity will continue in the Plan Area, minerals-related jobs will still be required in the wider area and in the Plan Area as a whole. In addition, information submitted as part of planning permission LW/799/CM(EIA) for the new Fishers wharf facility in Newhaven indicated that circa 100 new jobs would be created at the site, as well as 74 new full time equivalent jobs in East Sussex after accounting for scheme additionality and wider multiplier effects.</p>
R3-069	<p>Not clear how much of the 1.4mtpa imports would be reliant on importation infrastructure. Some imports including soft</p>	<p>Noted - Plan text has been amended and details of how provision has been</p>

	sand and material from Shoreham wharves will be by HGV. A breakdown of how the 1.4mtpa figure has been calculated would be beneficial.	calculated are set out in the Aggregates Data Technical Paper.
R3-065	Not objecting but concern that support for additional capacity could lead to loss to biodiversity in adjoining port areas. Recommends more careful wording of policy to ensure that proposals are supported only where they comply with the other policies set out in the WMLP.	Any proposals for additional processing capacity would be considered under WMLP policies which include environmental safeguards. Supporting text now clarifies that proposals will also be subject to the environmental protection requirements set out in other plan policies.
R3-063	Brett Aggregate assessment has identified that the only alternative capable of making supplies of sand and gravel to the Lydd market are the remote Thames wharves and Newhaven.	In terms of continuing supply to the existing market areas, the Fishers Wharf development at Newhaven could provide for the western side of the Plan Area, and any market variations to the east could be compensated for by, for example, further imports using existing capacity at Rye Harbour as well as from Kent.
R3-063	RM1 should be amended for provision of aggregates by a combined approach of seeking to protect, maintain and enhance existing aggregate importation infrastructure and capacity and recycled and secondary aggregate and critically by an allocation for an extension of Lydd Quarry.	Disagree. Alternative sources of material exist which can supply the Plan Area with lesser environmental effects, and the Authorities are satisfied that there are no overriding reasons why an allocation for aggregate working at this site should be included in the Plan. The Aggregates Data Technical Paper sets out the detail of capacity and alternative sources which can make provision for the Plan period.
R3-063	An extension at Lydd Quarry would assist in meeting the identified demand for aggregate to be met over the plan period, would enable continuity of service to an existing market and would make use of the existing plant facilities (processing and bagging) and infrastructure to meet the identified need.	The Authorities consider that mineral working at this site could not be supported due to the significant harm it would cause to the interests of the designated areas. As alternative sources of material exist which can supply the Plan Area, and as these have lesser environmental effects, the Authorities are satisfied that there are no overriding reasons why an allocation for aggregate working at this site should be included in the Plan. The Aggregates Data Technical Paper sets out the detail of capacity and alternative sources which can make provision for the Plan period.
R3-036	Extraction and restoration of this area would deliver large scale biodiversity benefits/gain delivering for the NPPF and forthcoming Environment Act.	The quarry and wider vicinity lies with of an area of significant environmental importance. There may well be opportunities to enhance the habitat and biodiversity; indeed this is the objective of the existing

		approved restoration plans for the quarry. However, further working of adjoining areas is not a requirement to increase biodiversity.
R3-063	Further extensions to Lydd Quarry would provide for an opportunity to deliver biodiversity net gain and other benefits in terms of wildlife and ecology as a whole.	The quarry and wider vicinity lies with of an area of significant environmental importance. There may well be opportunities to enhance the habitat and biodiversity; indeed this is the objective of the existing approved restoration plans for the quarry. However, further working of adjoining areas is not a requirement to increase biodiversity.
R3-036	Over reliance on MDA, and if local reserves are not allowed, alternative supply would result in longer distance lorry movements.	Disagree - the proposed Plan strategy also involves supply by recycled and secondary aggregates and other imports including crushed rock not just MDA. Lydd quarry is situated on the border between East Sussex and Kent, and therefore the supply area currently extends westwards into Kent and eastwards into the Plan area. In terms of continuing supply to the existing market areas, the Fishers Wharf development at Newhaven could provide for the western side of the Plan Area, and any market variations to the east could be compensated for by, for example, further imports using existing capacity at Rye Harbour as well as from Kent. The exact effect on haulage distances as a result of such changes is unknown. However, the new Fishers Wharf facility at Newhaven will be using a low emissions HGV fleet. In addition, the Plan's prioritisation of recycled aggregates has the potential to further offset CO2 emissions arising from any longer distances transportation.
R3-007	Under policy RM1 recommend reference to Policies S-AGG-3 and S-AGG-4 from the South Marine Plan, which refer to proposals in areas where high potential aggregate resource occurs and local sourcing of aggregates respectively.	Agree - Reference now included in the Plan.
R3-063	The increased delivery distances involved in supplying from the Thames wharves and Newhaven would result in significant increase in HGV road miles and in emissions	Lydd quarry is situated on the border between East Sussex and Kent, and therefore the supply area currently extends westwards into Kent and eastwards into the Plan area. In terms of continuing supply to the existing market areas, the Fishers

	of CO2 in comparison to the working of the proven mineral bearing land.	Wharf development at Newhaven could provide for the western side of the Plan Area, and any market variations to the east could be compensated for by, for example, further imports using existing capacity at Rye Harbour as well as from Kent. The exact effect on haulage distances as a result of such changes is unknown. However, the new Fishers Wharf facility at Newhaven will be using a low emissions HGV fleet. In addition, the Plan strategy prioritises the use of recycled aggregates which has the potential to further offset CO2 emissions.
R3-063	On the basis that there is a clear need to identify land won resources for allocation there does not appear to be any question that if that is the case that this should comprise an extension at Lydd Quarry.	Alternative sources of material exist which can supply the Plan Area with lesser environmental effects, and the Authorities are satisfied that there are no overriding reasons why an allocation for aggregate working at this site should be included in the Plan. The Aggregates Data Technical Paper sets out the detail of capacity and alternative sources which can make provision for the Plan period.

RM2

Rep ID	Comment	Authorities' Response
R3-028	Supports the Policy as it accords with national policy.	Noted.
R3-031	There is a water main with easements that runs within approximately 50-100m of the proposed Aldershaw site extension. Therefore, the Policy should include this as a development consideration.	The extension site is no longer being allocated.
R3-070	Extension will result in a direct loss of ancient woodland. In line with paragraph 175 of the NPPF development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. Compliance with NPPF 175 required.	The previously submitted extension site is no longer being allocated. Sites outside of the 15 metres buffer area of ancient woodland may be available and are being explored by the operator. A criteria based policy is included.
R3-065	Allocation will result in the destruction of ancient woodland within a Local Wildlife	The previously submitted extension site is no longer being allocated. Sites outside of

	Site and the High Weald AONB. SWT does not believe that the Authorities have demonstrated a clear public benefit that would outweigh the loss. Compensation should not be included in any assessment to determine whether exceptional benefits outweigh the loss of ancient woodland. Evidence should be prepared to justify exceptional need. Does not comply with para 175 of NPPF.	the 15 metres buffer area of ancient woodland may be available and are being explored by the operator. A criteria based policy is now included.
R3-045	Welcomes the policy as it supports the continued production of specialist hand-made tiles that are used in historic building repairs and restorations.	Noted. This extension is no longer being allocated however a criteria based policy is included.
R3-041	Unclear whether an extension to the north-west or a site else where on the farm would be appropriate to avoid designated sites i.e. are these areas within the same seam - this should be explained in the Plan to demonstrate that extending the extraction area into the ancient woodland and LWS is the only option and that there is an imperative overriding public interest for the development. More detail required on the likely effect on the ancient woodland and the required compensation and mitigation. Any compensatory strategy should be commenced at the time permission is granted and not at restoration phase. Map 11.1 incorrectly labelled.	The previously submitted extension site is no longer being allocated. Sites outside of the 15 metres buffer area of ancient woodland may be available and are being explored by the operator. A criteria based policy is now included.
R3-021	Supports the requirements for an appropriate mitigation and environmental enhancement scheme for the operation and restoration of the entire extraction site being a requirement for any permission.	Noted. Policy no longer allocates a specific site however the requirement for an mitigation and environmental enhancement scheme remains part of the policy.
R3-067	The allocation at Aldershaw Farm should not impact on the operation of the strategic road network. A Transport Assessment and Site Management Plan including dust reduction measures and wheel washing facilities are likely to be required and request to be consulted as the site is progressed.	The extension site is no longer being allocated. Any additional extraction site which comes forward would be assessed against the existing Development Management policies within the WMP.
R3-066	Allocation within ancient woodland. There is no appropriate mitigation for the loss of irreplaceable habitats. Where ancient woodland is to be replaced by new woodland, this should aim to create 30 hectares	The previously submitted extension site is no longer being allocated. Sites outside of the 15 metres buffer area of ancient woodland may be available and are being

	of new woodland for every hectare lost. future site allocations should apply the following principles to guide both site selection and the subsequent design of development: avoid harm; provide unequivocal evidence of need and benefits; deliver biodiversity net gain.	explored by the operator. A criteria based policy is included.
R3-007	Recommends reference to Policy S-AGG-4 from the South Marine Plan, which refers to local sourcing of aggregates.	Policy RM2 relates to clay and does not correlate with S-AGG-4. However, references to the South Marine Plan policies have been added to the relevant sections of the Plan.

RM3

Rep ID	Comment	Authorities' Response
R3-069	Sites that are already being worked have been removed in explanation box which means they would no longer be safeguarded from non-minerals development which could impact the continued working of the sites. Sites often become recycled and secondary aggregate producing sites during restoration and therefore sites which have not yet been restored should continue to be on the safeguarded sites list. Supports the continued safeguarding of soft sand resource. Questions how list of safeguarded sites would be periodically review without a Plan Review.	The area around Lydd Quarry is constrained by both National and European environmental designations including SSSI, Special Protection Area and Ramsar site. The continued safeguarding of these sites is not considered feasible due to the environmental constraints which are considered overriding. This has been clarified within the supporting text. Aggregate producing sites during restoration would be considered temporary. List of sites would be updated as part of the AMR process.
R3-036	References para 204c of NPPF. Safeguarding resources rather than specific sites is essential. The Policy does not provide safeguarding or identify comprehensive MSAs for sharp sand and gravel.	Unexploited areas of sharp sand and gravel are either physically or environmentally constrained and therefore safeguarding cannot be supported. See Aggregates Resource Paper for further details.
R3-062	Does not raise an objection to the safeguarding of Folkstone Beds reserve as it is not proposed for extraction at present. However, raises concerns that it could be extracted in the future which would be unacceptable as the area is an important setting for the chalk downs. Concerns are also raised about the potential impacts on settlements and traffic.	In line with the NPPF, paragraph 210c, safeguarded areas do not create a presumption that resources defined will be worked. Impacts upon amenity, traffic etc. would be addressed at the application stage should a proposal come forward. Any application would be subject to the policies in the Waste and Minerals Plan, the South Downs Local Plan (where appropriate). Any application would need to consider major development, i.e. whether

		exceptional circumstances exist and whether development is in the public interest.
R3-070	Supports Lydd Quarry no longer being safeguarded.	Noted.
R3-043	Policy should set out what is required in MRA inclu. Type of mineral, extent of sterilisation, economic value/viability, site specific considerations and possibility for prior extraction. Information should be proportionate to site.	Separate guidance produced and to be published.
R3-043	Policy is supported.	Noted.
R3-066	Ditchling / Plumpton - Soft Sand Reserve within 3 areas of ancient woodland. Little Standard Hill, Stanton's Farm & Novington safeguarded areas adjacent to areas of ancient woodland.	Identification of resources for safeguarding does not infer they will be given planning permission. Any application would be subject to the policies in the Waste and Minerals Plan, the South Downs Local Plan (where appropriate). Any application would need to consider major development, i.e. whether exceptional circumstances exist and whether development is in the public interest in line with National Policy.
R3-065	Supports the removal of the non-permitted sand and gravel resources at Lydd Quarry from the safeguarded sites list.	Noted.
R3-041	Unclear whether the requirement for an MRA would be needed for all developments (other than those in the excluded development list). Queries whether size thresholds would be applied such as those in POS guidance. Excluded development list should be included in RM3 text. Requirement of MRA should be proportionate to development and included in Policy text. Requirements for MRA and MIA would have resource implications for County Council.	Separate guidance has been produced detailing when and what type of assessment would be required to be submitted. Reference to the excluded development list has been made in the supporting text for RM3. It is the MPAs statutory duty to respond to consultations within MSAs and MCAs.
R3-034	Ibstock; Ashdown, Chailey & Horam sites have been omitted from the Policies Map. Response includes a revised map for Horam with an area not to be included as the operator does not consider the area feasible for extraction. Revised maps for Ashdown & Chailey submitted showing full extent of resource outside of permitted areas.	Page 6 of the RPD Draft Policies Map states that: "The following locations are proposed to be safeguarded in addition to those already safeguarded as depicted in the Waste and Minerals Sites Plan" No sites have been omitted from the Policies Map. Clay resources are abundant and there are no overriding reasons to extend the safeguarded resource. The existing

		safeguarded areas are based on permitted reserves. Regarding the removal of part of the safeguarded area at Horam brickworks, there are no clear overriding reasons for this.
R3-028	Supports the safeguarding of economically viable resources and considers the policy's wording appropriate to prevent sterilisation of the minerals at these locations or prejudice their extraction. MSA maps should include all known economically important resource (even in AONB, SDNP etc) as changes can only be assessed through planning application process. Existing 2017 MSAs doesn't include all known resource therefore there is risk of potentially viable resources becoming sterilised.	The NPPF states that LPAs should adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided. The Aggregates Resource Topic paper sets out reasons for why all known resources are not being safeguarded - many of the seams are narrow or would require extraction from river beds. For clarification, the word 'potentially' has been inserted before viable in the policy text.
R3-007	Recommends reference to Policy S-AGG-3 South Marine Plan, which refers to proposals in areas where high potential aggregate resource occurs.	There is no clear link between Policy S-AGG-3 and the safeguarding of minerals resource. However, references to the South Marine Plan policies have been added to the relevant sections of the Plan.

RM4

Rep ID	Comment	Authorities' Response
R3-028	The requirement for a minerals resource assessment (MRA) to assess the feasibility of prior extraction should be included within the Policy text. Criteria of the Policy should be further developed to include cases where it can be demonstrated there is an overriding need for sterilising non-mineral development and prior extraction would have an adverse effect on the viability of the development. Considers further exemptions relating to specific developments e.g. non-material amendments exemption should apply to the Policy.	Requirement for the MRA is included within supporting text and separate guidance has been produced. The need for a MRA may not always be applicable. Part b) of RM4 addresses the comment regarding viability and the criteria is based on NPPF requirements. The 'excluded development' list included in the RPD states it applies to this policy. However, wording has been added to supporting text stating it should be read in conjunction with the excluded development list.
R3-036	Supports the Policy.	Noted.
R3-041	Notes that this policy has stronger wording than SP8. Requirement for MRA should be included in Policy text and details of when MRAs would be required is needed.	Guidance produced which has been referenced within the supporting text of the Policy.

R3-034	In response to the prior extraction policy: Part b) - Operators plan many years ahead for permitted reserves. Conflicting form of development could sterilise minerals which would not ordinarily be extracted for many years, meaning the relevant mineral operator cannot 'practically or feasibly extract' said mineral. Minerals should be retained as a long term resource. Modify or preferably remove b).	Mineral Resource Assessments would be a mechanism to ascertain whether it is viable to extract the resource at that point in time. Policy wording reflects the requirements of the NPPF para 210(d).
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RM5

Rep ID	Comment	Authorities' Response
R3-036	Supports the Policy.	Noted.
R3-028	Supports the direction of the Policy. The terms 'vicinity' and 'disturbance' i.e. noise, light, dust should be defined in policy text to assist LPAs when applying the policy.	Mitigation in line with the agent of change principle would be dependent on the location i.e. rural/urban, type and use of the proposed non-minerals development. It is difficult to define vicinity as a non-minerals development located 250m from an infrastructure site in an urban area would be affected differently to a non-minerals development 250m from an infrastructure site in a more rural area e.g. the railhead at Mountfield. The term 'disturbance' has been defined within the supporting text.
R3-063	It is considered that the Policy could be more strongly worded in terms of the requirements of proposals coming forward which could prejudice the operation of the safeguarded infrastructure - similar to RM6.	Proposals within close proximity of infrastructure sites (except excluded development) would be subject to a minerals infrastructure assessment. A separate guidance document details the requirements of this.
R3-063	Wording of RM5 should be consistent with RM6 i.e. infrastructure facilities are safeguarded against development which would unnecessarily sterilise or prejudice its use. RM5 should use same wording 'should not be permitted' as opposed to 'will not be supported'.	Agreed. To ensure consistency between policies, the wording in RM5 has been amended.
R3-069	A consistent approach to M10 of the JMLP should be taken i.e. listing specific wharf sites to show that authorities are working together to ensure that sufficient wharf capacity is being safeguarded. Questions	The authorities' approach of safeguarding all wharves within the Brighton & Hove part of Shoreham Port is long-established and was found sound by the appointed inspector during the examination of the Waste and Minerals Plan in 2013. A

	how list of safeguarded sites would be periodically review without a Plan Review.	Statement of Common Ground has been agreed with West Sussex County Council which sets out an agreed future policy approach with regard to Shoreham. The list of sites would be updated as part of the AMR process.
R3-041	Minerals Infrastructure Assessment (MIA) requirement should be in policy text. A requirement for a MIA to accompany all planning applications within it (other than the excluded development listed at paragraph 6.50) could be unduly onerous. Details of when an MIA is required and excluded development list should be referenced.	The separate guidance document on MIA's would includes details for when one is required and these would be proportionate to the scale of the proposed development. This has been clarified within the supporting text.
R3-041	Does not object to the agent of change principle text if it does not restrict the development of Land at Stoneworks Cottages, Rye Harbour, which is allocated for residential development in the DASA.	The Agent of Change Principle is set out within National Policy therefore decision-makers already have a duty to apply this principle.
R3-007	Recommends reference to Policy S-AGG-3 South Marine Plan, which refers to proposals in areas where high potential aggregate resource occurs.	There is no specific link between this policy and RM5. However, references to the South Marine Plan policies have been added to the relevant sections of the Plan.

RM6

Rep ID	Comment	Authorities' Response
R3-038	Concreting batching plant in Jarvis Brook Crowborough can only be accessed by road and the routes are already congested due to surrounding developments - these constraints are not addressed within the Policy.	Traffic impacts would have been considered at the decision making stage by the LPA. Policy WMP26 would capture issues relating to traffic impact.
R3-041	No comments.	Noted.
R3-007	Recommends reference to Policy S-AGG-3 South Marine Plan, which refers to proposals in areas where high potential aggregate resource occurs.	There is no clear link between Policy S-AGG-3 and the safeguarding of concrete batching facilities. However, references to the South Marine Plan policies have been added to the relevant sections of the Plan.
R3-036	Supports the Policy.	Noted.

R3-069	Questions how list of safeguarded sites would be periodically review without a Plan Review.	Policy wording takes precedence over maps or other illustration; a facility is considered safeguarded if it meets the criteria of the policy. List of sites would be updated as part of the AMR process - wording has been added to the supporting text to explain this.
R3-028	The policy text could be strengthened if 'The MPA will' was to be replaced with 'Planning permission will only be granted for development that is incompatible with the safeguarding of facilities for concrete batching, coated stone materials manufacture and other concrete products within the urban area where it is demonstrated that	Agreed. The wording within the policy has been amended.
R3-063	Should include reference to agent of change principle.	Reference to the principle has been added to supporting text.

RM7

Rep ID	Comment	Authorities' Response
R3-028	The Plan is part of the Development Plan for the entire area and is specific to the mineral and waste development policy coverage of the entire area and should therefore include SDNP. RM7 should be the MCA policy for all Plan Area Authorities. Excluded development list could be within Policy Text.	The supporting text states that BHCC and SDNPA would consider this in their own decision taking. Relevant LPAs in these areas would apply this policy as part of the Development Plan. The excluded development list applies to various policies and has therefore been moved earlier in the document and text added to explain which policies it applies to.
R3-041	The need to enlarge MCA for wharves at Rye Harbour is unclear, but notes it correlates with Harbour Road employment area and residential allocation boundary. There are concerns that MCA would conflict with the development of new employment buildings. Questions the need to protect a greater area than Rastrums wharf, extension northwest and access. Notes that planning applications within the Harbour Road Employment Area will be determined by the District Council in accordance with Policy RHA2 of the DaSA Local Plan (2019) which includes criteria to protect wharves.	The wider MCA at Rye Harbour is to ensure the MWPA are consulted on development proposals which could compromise operations and capacity at the wharf even if they are not actually on the wharf site itself. For example, residential development adjacent to a wharf may not be compatible with the noise and dust potentially resulting from the wharf operation.

	RPD should state that RM3 and RM5 should be read in conjunction with RM7.	
R3-041	Excluded development list is welcomed.	Noted.
R3-041	Policy requirements should not cause a delay in determining applications.	It forms part of the County Council's statutory duty to respond to consultations in a timely manner.
R3-041	Supporting text may cause confusion as it refers to MSAs and recommends removal of this reference.	Reference to MSAs has been removed from the supporting text.
R3-041	The level of information required in Infrastructure Assessment needs to be made clear in the policy. It is important that any additional requirements which arise as a result of extending the MCA do not compromise the delivery of development in this key employment area or the allocated housing site.	Separate guidance has been produced to assist both LPAs and developers/applicants. Information requirements would be proportionate to the scale and nature of the development and each proposal would be assessed on a case by case basis in accordance with the guidance.
R3-036, R3-063	Supports the Policy.	Noted.

RV1

Rep ID	Comment	Authorities' Response
R3-028	KCC support the approach taken in relation to development in the National Park and AONB as it accords with national policy.	Noted.
R3-045	HE welcomes the protection of designated landscapes within RV1	Noted.
R3-044	Town Council has concerns that the inclusion of 'exceptional circumstances' in policy RV1 will allow development to come forward in protected landscape.	The NPPF is clear that circumstances may exist that could allow development to come forward within protected landscapes. Those circumstances would be 'exceptional' and need to be considered at the time that an application is submitted. RV1 reflects national policy.
R3-064	There would not be exceptional circumstances for large scale waste and minerals development within Hastings.	The wording within RV1 aligns with the NPPF.
R3-041	The inclusion of a new policy - RV1 - which relates to the South Downs National Park and the High Weald Area of Outstanding Natural Beauty - is welcomed. We have no	Noted.

	other comments on Policy RV1 subject to consideration of what specific comments are made on this Policy by the High Weald AONB Unit and Natural England.	
R3-043	Minerals development can have positive as well as adverse impacts and this should be reflected within the wording of RV1. Wording of RV1 should not paraphrase national policy and suggestions are made to improve the wording to that effect.	RV1 aligns with national policy. There may be instances where, on balance, major development can take place within designated landscapes and this includes where benefits of restoration can be secured. There is a separate policy within the WMP that relates to restoration.
R3-065	Support the replacement of policy WLP2 with new policy RV1. We recommend that the Authorities take the advice of the High Weald AONB until as to the suitability and robustness of the policy wording.	Noted
R3-062	Support for the wording in RV1 in relation to the purposes and duty of the national park as well as support for the policy criteria relating to the backfilling of quarries.	Noted.
R3-070	Support for the text in RV1. Request an additional criteria to require an mitigation package to be implemented	Note support for the policy wording. The Authorities do not feel that additional wording is required as planning permission would only be granted on the basis that the mitigation would happen.
R3-061	Concern that RV1 allows for exceptional circumstances and suggests more restrictive wording to protect the designated landscapes in the Plan Area	The wording within RV1 aligns with the NPPF.

RV1 (Purpose)

Rep ID	Comment	Authorities' Response
R3-041	Typographical error - Under the "Purpose of Policy RV1" on page 14 there is an extra "the" which needs deleting: ...and the purposes and objectives of the High Weald Area of the Outstanding Natural Beauty Management Plan.	Noted.

RW1

Rep ID	Comment	Authorities' Response
R3-007	Under policy RW1, RM1 and RM2 we recommend reference to Policy S-AGG-4 from the South Marine Plan, which refers to local sourcing of aggregates.	References to the South Marine Plan and its policies have been added to the Plan. The policies of the South Marine Plan should be considered in the determination of planning applications where relevant.
R3-028	Support for policy.	Noted.
R3-065	SWT supports the consolidation of policies WMP7a and WMP7b into policy RW1	Noted.
R3-039	The change in policy and wording weakens the protection for areas outside of those currently preferred and allows a “get out clause” to permit development outside of these areas.	Policy RW1 and WMP7a contain the same clause.
R3-015	Policy should be altered so that it only applies to land uses involved in the prevention, reduction and reuse of waste.	The WMLP must ensure that there is adequate provision for the management of all types of waste. Recycling, recovery and disposal are all important elements in the waste hierarchy alongside prevention and reuse.
R3-065	Concerned about criteria B3 as it is not clear what ‘overriding reasons’ means in this context. Further detail should be provided as to the need for this caveat.	This enables, subject to the appropriate permission, for the continued use of waste management and minerals processing at locations after the landfilling or quarrying has ceased. This enables making the most sustainable use of these facilities, where it is appropriate.

Recycled aggregates, advocating for more

Rep ID	Comment	Authorities' Response
R3-005	Advocates reducing CDEW waste to produce more recycled aggregates to substitute for virgin materials. Not in line with Councils climate emergency commitment.	The Plan strategy for aggregates provision is to provide alternatives to land-won aggregates such as recycled and secondary aggregates as well as imports. There are limitations to the contribution that recycled materials can make to overall supply due to specifications and volumes of CDEW needed as feedstock. However a new policy now clarifies that the use of recycled and secondary aggregate will be prioritised over virgin materials. Plan text has also

		been amended to emphasise the contribution that recycled and secondary materials can make to provision.
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Sustainability Appraisal

Rep ID	Comment	Authorities' Response
R3-065	Topic D: Loss of irreplaceable habitat cannot be mitigated or fully compensated for. Annex D Objective 9 (climate change) is flawed: ancient woodland and its soils are a carbon sink and destruction would release greenhouse gases and a loss of habitats would stop the isolation of carbon. Objective 14: disagrees that loss of ancient woodland can be mitigated or fully compensated for as it is irreplaceable and therefore net gain biodiversity can never be achieved where it is destroyed. Does not comply with Para 174 of NPPF.	The previously submitted extension site is no longer being allocated. Sites outside of the 15 metres buffer area of ancient woodland may be available and are being explored by the operator. A criteria based policy is included. The Sustainability Appraisal has been amended accordingly.

Sustainability Appraisal. Lydd quarry

Rep ID	Comment	Authorities' Response
R3-063	the Sustainability Appraisal is clear that the options being considered whilst the revised policies were being prepared in relation to the strategy for the provision of sand and gravel were either a) to provide the required sand and gravel by maintaining the existing mix of recycling, imports and quarrying. This option would involve the allocation of the extension at Lydd Quarry; or b) was to not allocate the extension at Lydd Quarry and rely on recycled and imported sand and gravel.	These points have been noted by the Authorities as part of the Sustainability Appraisal.
R3-063	The Sustainability Appraisal does raise the prospect of project level mitigation	These points have been noted by the Authorities as part of the Sustainability Appraisal.
R3-063	Sustainability Appraisal Report (March 2020) Technical Annex D, Appraisal of Sites - reflects the above conclusions confirming that 'it is highly unlikely that secondary aggregates would be able to meet the demand for aggregates within the Plan' and that 'non-allocation [of a Lydd Quarry	These points have been noted by the Authorities as part of the Sustainability Appraisal.

	Extension] is likely to result in aggregate being transported over a longer distance’.	
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Traffic

Rep ID	Comment	Authorities' Response
R3-039	Construction traffic should be required to avoid minor and rural roads.	It is very difficult to restrict the roads which construction traffic uses. For large schemes, routing agreements are sometimes possible through S106 agreements, but not always.
R3-019	Plan would result in additional traffic in Newhaven.	The proposed Revised Policies rely on the use of existing permitted facilities. This may increase traffic levels around existing facilities. Most minerals and waste facilities have limits on vehicle movements which restrict the number of movements at any given site.
R3-023	Plan should sort A259.	Traffic is a consideration in the determination of planning applications under Policy WMP26
R3-037	Concerned about traffic levels (Newhaven)	Noted - The Plan as proposed does not propose additional development beyond that which is already permitted.

WMP17

Rep ID	Comment	Authorities' Response
R3-065	SWT believes that in line with the changes required to policy WMP27, the authorities should also consider updating policy WMP17 to better reflect the requirements of paragraph 170 and 171 of the NPPF. In particular, Biodiversity Action Plans are not the only relevant evidence base and are often out of date. We feel it is restrictive to only reference these, when documents such as the SxLNP Natural Capital Investment Strategy could be equally as relevant. We therefore recommend the following changes to policy WMP17: 1. In criteria b. remove the word 'can' and delete from the word 'assist' to the end of	The Authorities consider that WMP17 remains sound at this time. It will be subject to review as part of a full review of the Plan.

	the sentence. 2. Replace reference of WMP27 with reference to RD1.	
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WMP18

Rep ID	Comment	Authorities' Response
R3-067	We [Highways England] consider that the transport of minerals and waste has the potential to generate a significant number of Heavy Goods Vehicle (HGV) movements using the SRN. We note that Policies WMP18 (Transport - Road, Rail and Water) and WMP 26 (Traffic Impacts) remain unchanged, which reference managing and mitigating adverse traffic impacts from the proposed developments. We also note Paragraph 3.36 of the Revised Policies document which states the current limitations of the road network as a consideration in planning for new development.	Noted.

WMP24

Rep ID	Comment	Authorities' Response
R3-061	Climate Change Policy WMP24 is no longer fit for purpose. In order to remain sound, it requires up-dating to reflect your Authority's obligations to contribute to achieving national and your own local net zero emissions targets. This also affects Policy RD1.	Climate change is currently addressed through Policy WMP 24a Climate Change; a review of this policy is not within the scope of this partial review. As set out in the Context section of the plan, it will be the subject of the next full review of the Plan.

WMP28a

Rep ID	Comment	Authorities' Response
R3-021	We [Environment Agency] have reviewed other Development Management policies in the adopted Local Plan relevant to our remit. The existing policy WMP28a Flood risk is still fit for purpose and coupled with the requirements in the NPPF can ensure that flood risk management and resilience is	Noted.

	fully considered through the determination of a planning application.	
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WMP28b

Rep ID	Comment	Authorities' Response
R3-021	WMP28a Water Resources and Water Quality provides certain comfort that the impact of development proposals on water resources and water quality will be considered as we highlighted in our original submission to the Waste and Minerals Plan prior to its adoption in 2013 we have some concerns with the use of the term "unacceptable" adverse impacts and that by very nature suggests that some adverse impacts are appropriate. If there are any opportunities to strengthen this policy further as part of the review of the Waste and Minerals Local Plan we would welcome this.	The word "unacceptable" is required in the policy because the term 'risk' requires quantifying. Without quantifying almost all development poses some, even if miniscule, level of risk.

WMP3b

Rep ID	Comment	Authorities' Response
R3-017	Seeks the establishment of a composting collection service in the Plan Area.	The WMLP ensures that there is adequate land provision for waste management facilities. Collection of household waste is the responsibility of the borough, district and city councils.

WMP3c

Rep ID	Comment	Authorities' Response
R3-017	Seeks the incorporation of policies that seek to change people's behaviour so that they don't use single use plastics.	The WMP promotes the general reduction in the production of all waste.
R3-017	Suggests the disposal of non-recyclable plastics at the CTEC Plant, Newhaven.	Noted.

WMSP-A/B

Rep ID	Comment	Authorities' Response
R3-002	Residential dwellings have been permitted under prior-notification, suitability of site of waste management uses should be considered.	Noted; this will be a consideration when the topic of waste management is reviewed in a future review.
R3-002	Site owner wishes to promote site for housing; site has not been developed for waste uses to date; site should be de-allocated for waste uses.	At this time, the Authorities are focusing on minerals provision within the WMLP. It is anticipated that the topic of waste management will be undertaken in a subsequent review. Allocated sites for waste management are safeguarded for that use under policy WMP6. However, that policy does state that where "it is demonstrated that alternative capacity is permitted and delivered elsewhere within the Plan Area, or unless it is demonstrated that the waste management provision is no longer needed to meet either local or strategic needs" that a site will no longer considered to be safeguarded. Proposals for non-minerals and waste uses, submitted in the form of submissions to the relevant district or borough local plan or as a planning application, that demonstrated that the criteria was met, could be allocated or permitted to be used for other uses. From the information available in the WMP and AMR in the context that that the WMLP make waste management provision until 2026/27, meeting the criteria above does not appear to be insurmountable at this time.

WMSP-A/C

Rep ID	Comment	Authorities' Response
R3-050	Site owner wishes to de-allocate site; site has not been developed for waste uses to date; site surroundings have changed since allocation; site should be de-allocated for waste uses.	At this time, the Authorities are focusing on minerals provision within the WMLP. It is anticipated that the topic of waste management will be undertaken in a subsequent review. Allocated sites for waste management are safeguarded for that use under policy WMP6. However, that policy does state that where "it is demonstrated that alternative capacity is permitted and

		delivered elsewhere within the Plan Area, or unless it is demonstrated that the waste management provision is no longer needed to meet either local or strategic needs" that a site will no longer considered to be safeguarded. Proposals for non-minerals and waste uses, submitted in the form of submissions to the relevant district or borough local plan or as a planning application, that demonstrated that the criteria was met, could be allocated or permitted to be used for other uses. From the information available in the WMP and AMR in the context that that the WMLP make waste management provision until 2026/27, meeting the criteria above does not appear to be insurmountable at this time.
R3-014	Concerned by potential effects of any future waste facility on site in relation to traffic; hours of operation; noise; air quality, and drainage.	These matters would be subject to the development management policies contained within the WMP to ensure that any proposed development is acceptable.
R3-014	Residential dwellings have been permitted under prior-notification, suitability of site of waste management uses should be considered.	Noted; this will be a consideration when the topic of waste management is reviewed in a future review.

Waste

Rep ID	Comment	Authorities' Response
R3-019, R3-022, R3-023, R3-024, R3-025, R3-027, R3-029, R3-048, R3-052, R3-054, R3-055, R3-056, R3-057, R3-058, R3-068	Plan should focus on preventing and reducing waste in order to tackle climate change.	Adopted Policy WMP3a, supported policies WMP3b-e in the WMP seek to achieve this. Policies WMP24a and WMP24b directly relates to climate change.
R3-055	Plan is not consistent with the waste hierarchy.	The overall approach to minerals provision is set out in WMP4 which prioritises secondary aggregate over virgin material. The approach to waste management it set out in policy WMP3a, which embeds the waste hierarchy into the WMLP.
R3-055	Plan does not properly address the UK government's legal commitment to the Paris Agreement on climate change	The Revised Policies Document is a targeted amendment to the WMLP. The waste

		management policies will be updated in a future review.
R3-009	<p>The Resources and Waste Strategy focuses on becoming a 'Circular Economy' highlighting key targets and milestones such as a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and for 10% (or less) waste to landfill by 2035. These targets run in line with the Governments 25 year plan in order to move away from a 'Linear' economic model and to leave our environmental in a better place for future generations. These documents are all highlighted in the draft plan under section 'National Policies and Strategies' Para 3.6 & 3.8, however it is unclear as to where these have been reviewed and implemented into the published documents.</p>	<p>The WMP was written prior to the introduction of the term Circular Economy. However, although it was written prior to that, it contains high targets (95% and greater) for diversion to landfill for the three major waste streams. The waste management policies contained within that plan make provision until 2026/27. The plan makes provision for adequate recycling and recovery capacity to meet the recycling targets within the plan. The WMP also permits the provision of recycling capacity in lieu of recovery capacity. The achievement of 75% recycling rate for packaging in part relies on the producers of packaging changing their products and ensuring that it is made of materials that can be recycled. The WMP does not preclude this happening. The 65% recycling rate for MSW is more complex, and would need to be addressed though either a future waste management contract or other arrangements made by the City and County Councils, which should be prepared at the same time as the waste land use policy. The Authorities have focused this review in the view that waste management would be better addressed in a subsequent review.</p>
R3-039	<p>I applaud the reduction in waste going to landfill and the work which has been done to achieve this. I hope that the trend continues downward, as there are further improvements to be made.</p>	Noted.
R3-006	<p>Contaminated sites should be managed properly.</p>	Contaminated sites are regulated by the Environment Agency.
R3-011	<p>Plan should focus on preventing and reducing waste in order to tackle climate change.</p>	Adopted Policy WMP3a, supported policies WMP3b-e in the WMP seek to achieve this. Policies WMP24a and WMP24b directly relates to climate change.
R3-018	<p>Why do we still consider It responsible to extract building materials from the seabed. Why is it impossible to recycle most building waste and repurpose it rather than consign it to land fill?</p>	The amount of recycled aggregate that could be produced and used was a factor when calculating the amount of aggregate required; the amount that can be produced is insufficient to meet the amount required. See WMP4 for broad approach.

R3-011, R3-019, R3-022, R3-023, R3-024, R3-025, R3-027, R3-029, R3-048, R3-052, R3-054, R3-055, R3-056, R3-057, R3-058, R3-068	Objects to additional waste management development in areas where waste management facilities are concentrated.	This is addressed by WMP25 and WMP19.
R3-011, R3-019, R3-022, R3-023, R3-024, R3-025, R3-027, R3-029, R3-039, R3-048, R3-052, R3-054, R3-055, R3-056, R3-057, R3-058, R3-060, R3-068	Plan should include high targets on waste reduction, reuse and recycling.	Targets for MSW (LACW), C&I and CDEW waste are included in the WMP - tables 3, 4, and 5. These seek to achieve the following recycling & recovery rates by 2025/26 (LACW: 55% / 98%; C&I: 70% / 98%; CDEW: 50% / 98%)
R3-011, R3-022, R3-023, R3-024, R3-025, R3-027, R3-029, R3-048, R3-052, R3-054, R3-055, R3-056, R3-057, R3-058, R3-068	Plan should not permit large energy recovery facilities.	The WMLP makes provision for the safe management of all waste and recovery or disposal is currently the only option for some types of waste. The WMLP makes adequate provision for waste management until 2026/27 and this topic not the focus of this review. It is anticipated that it will be addressed in a future review.
R3-019	Plan should include support for waste reduction, reuse and recycling.	The WMP contains a number of policies that seek to achieve this: WMP3a, WMP3b, WMP3d in particular.
R3-046	The Plan should place an increased emphasis on a 'circular economy' approach to the recycling and reuse of construction waste materials	The WMP was written prior to the introduction of the term Circular Economy. However, although it was written prior to that, WMP3a and WMP3b embeds the waste hierarchy into the Plan. WMP3d specifically addresses the management of construction waste.
R3-009	Seeking reassurance that the Authorities have completed a full review of its waste needs and its provision for waste to ensure they are sufficient within the plan area.	At the outset of this review the Call for Evidence and Sites set out the areas of the WMLP that the Authorities had identified required amending, following the submissions to that the Draft Revised Policies Document was prepared. The Authorities consider that the general topic of waste management is currently considered to be adequately addressed by the existing plan for the life of WMP i.e. until 2026/27. This review will not extend the life of those policies, and it will be the subject of a subsequent review.
R3-064	The opportunities to reuse building materials for construction projects should be	The Waste and Minerals Local Plan is concerned with land use policies related to

	maximised, either from the site if available, or from elsewhere. This should be a policy consideration as it is an important part of the waste hierarchy and supports the principles of a circular economy. There is a huge amount of research going on at the moment looking at buildings as material resource banks of the future and this should be recognised in these policies.	waste and minerals development. The promotion of the use of recycled and reused material in other developments is best achieved through either industry specific intervention by government or through the local plans that control such developments as prepared by the district and borough councils. See WMP3d and WMP21 for more information in relation to waste minimisation.
R3-038	The plan and policy documents need updating to reflect the closure of the Forest Row recycling site.	The Authorities periodically review the safeguarded sites list. At this time, the site has not yet met the criteria to be de-safeguarded.
R3-015	Plan should include high targets on waste reduction, reuse and recycling.	This is contained within WMP Policies 3a - 3e. The topic of waste management is not the focus of the current partial review.
R3-046	Proposal at para 2.1 to retain the existing policy WMP3d: Minimising and Managing Waste During Construction, Demolition and Excavation is welcomed.	Noted
R3-038	The plan lacks a clear strategy for shifting the balance of waste disposal from incineration to recycling, re-use, or reduction.	The WMLPs preference for ensuring that waste is managed as far up the waste hierarchy as practicable is set out in WMP3a, 3B and 3d.
R3-015	Plan should seek to reduce the amount of CD&E waste.	This is addressed by WMP3a & WMP3d
R3-006	Plan should promote waste minimisation.	This is addressed by WMP3a
R3-019	Plan should not permit large energy recovery facilities.	The WMLP makes provision for the safe management of all waste and recovery or disposal is currently the only option for some types of waste. The WMLP makes adequate provision for waste management until 2026/27 and this topic not the focus of this review. It is indicated that it will be addressed in a future review.
R3-005	Plan should increase use of waste in construction (including recycled aggregates).	The broad strategy in relation to minerals does this, as set out in WMP4, in respect of recycled aggregates.
R3-005	Plan should include targets for the reduction of waste produced by the construction industry.	This is addressed by WMP3a & WMP3d

R3-046	Policy RD1 could be expanded to identify a requirement for at least 10% biodiversity net gain, in line with the emerging Environment Bill.	The policy is worded to ensure that net-gain is provided. Duplication of the exact level and metrics used to determine it, which will be addressed through national legislation, is unnecessary.
R3-039	Plan should require construction industry to use more green and recycled materials.	Policy WMP21 Opportunities for Sustainable Waste Management and Minerals Production in Other Developments seeks to reduce waste, but the WMLP isn't the appropriate document to specify the type of materials to be used in all developments. The requirement to use recycled and green materials is best addressed through industry wide intervention or through district and borough local plans for which the materials used in development can be better addressed.

Waste Site Safeguarding.

Rep ID	Comment	Authorities' Response
R3-013	A waste management operation was permitted on the site known as "The Old Coal Yard, Hailsham". It should be shown as a safeguarded waste site within the Plan.	Noted. Safeguarding list updated.

Waste, Circular Economy

Rep ID	Comment	Authorities' Response
R3-015	The circular economy approach to construction materials being developed as policy by BHCC should be incorporated into the WMLP.	The WMP was written prior to the introduction of the term Circular Economy. However, although it was written prior to that, it contains high targets (95% and greater) for diversion to landfill for the three major waste streams. The waste management policies contained within that plan make provision until 2026/27. The Authorities have focused this review on minerals with a view to addressing waste management in a subsequent review.
R3-015	Support references to Circular Economy.	Noted.

Appendix A – List of Representations with links

Rep Number	Submission Number	Links	Respondent
R3-001	1	R3-001.pdf (Size: 54.61K)	Test
R3-001	2	R3-001 .pdf (Size: 67.2K)	Test
R3-002	1	R3-002.pdf (Size: 57.83K)	David Collins
R3-002	2	R3-002A [R] (Collins).pdf (Size: 247.95K)	David Collins
R3-002	3	R3-002 .pdf (Size: 104.79K)	David Collins
R3-003	1	R3-003.pdf (Size: 58.1K)	Shoreham Port
R3-003	2	R3-003 .pdf (Size: 77.51K)	Shoreham Port
R3-004	1	R3-004.pdf (Size: 57.73K)	East Chiltington Parish Council
R3-004	2	R3-004 .pdf (Size: 98.86K)	East Chiltington Parish Council
R3-005	1	R3-005.pdf (Size: 56.18K)	Sam Jenner
R3-005	2	R3-005 .pdf (Size: 94.37K)	Sam Jenner
R3-006	1	R3-006.pdf (Size: 55.42K)	Amanda Jobson
R3-006	2	R3-006 .pdf (Size: 85.04K)	Amanda Jobson
R3-007	1	R3-007.pdf (Size: 55.14K)	Marine Management Organisation
R3-007	2	R3-007A [R] (MMO).pdf (Size: 174.32K)	Marine Management Organisation
R3-007	3	R3-007B [R] (MMO).pdf (Size: 309.91K)	Marine Management Organisation
R3-008	1	R3-008.pdf (Size: 56.69K)	Gatwick Airport
R3-008	2	R3-008A [R] (Gatwick Airport).pdf (Size: 105.32K)	Gatwick Airport
R3-008	3	R3-008B [R] (Gatwick Airport) PL Policy Response LGW4151 18-05-20.pdf (Size: 232.4K)	Gatwick Airport
R3-008	4	R3-008C (Gatwick Airport) 15km Gatwick Safeguarding Zone Extents LGW4151 18-05-20.pdf (Size: 603.28K)	Gatwick Airport
R3-009	1	R3-009.pdf (Size: 57.55K)	Biffa Waste Services
R3-009	2	R3-009A [R] (Biffa Waste Services) Biffa Waste Services Response 2020.pdf (Size: 199.51K)	Biffa Waste Services
R3-010	1	R3-010.pdf (Size: 58.85K)	Kier
R3-010	2	R3-010A [R] (Kier).pdf (Size: 197.55K)	Kier
R3-011	1	R3-011.pdf (Size: 56.46K)	Shushter et al
R3-011	2	R3-011A (Shuster et al.) Signatory List.pdf (Size: 155.23K)	Shushter et al
R3-011	3	R3-011B [R] (Shuster et al.) Action Network First Email.pdf (Size: 131.87K)	Shushter et al
R3-012	1	R3-012.pdf (Size: 57.58K)	Wienerberger

R3-012	2	R3-012A [R] (Wienerburger) Brett Aggregates Letter of Support - Lydd Quarry 13.07.2020.pdf (Size: 1,756.98K)	Wienerberger
R3-013	1	R3-013.pdf (Size: 58.73K)	Alan Potter - Beyond Waste
R3-013	2	R3-013A (Potter).pdf (Size: 216.06K)	Alan Potter - Beyond Waste
R3-014	1	R3-014.pdf (Size: 60.16K)	Zoar Chapel
R3-014	2	R3-014A [R] (Zoar Chapel).pdf (Size: 487.31K)	Zoar Chapel
R3-015	1	R3-015.pdf (Size: 58.38K)	Lewes District Green Party
R3-015	2	R3-015A (Green Party, Lewes District).pdf (Size: 85.09K)	Lewes District Green Party
R3-015	3	R3-015 .pdf (Size: 80.18K)	Lewes District Green Party
R3-016	1	R3-016.pdf (Size: 55.25K)	Peter Isted
R3-016	2	R3-016 .pdf (Size: 82.8K)	Peter Isted
R3-017	1	R3-017.pdf (Size: 58.79K)	Plastic Free Eastbourne CIC
R3-017	2	R3-017 .pdf (Size: 111.89K)	Plastic Free Eastbourne CIC
R3-018	1	R3-018.pdf (Size: 55.73K)	Hugh Woodhouse
R3-018	2	R3-018 .pdf (Size: 81.71K)	Hugh Woodhouse
R3-019	1	R3-019.pdf (Size: 56.12K)	Lesley Healey
R3-019	2	R3-019A [R] (Healey).pdf (Size: 132.25K)	Lesley Healey
R3-020	1	R3-020.pdf (Size: 56.61K)	William Ackroyd
R3-020	2	R3-020A [R] (Ackroyd).pdf (Size: 133.75K)	William Ackroyd
R3-021	1	R3-021.pdf (Size: 57.13K)	Environment Agency
R3-021	2	R3-021A [R] (Environment Agency).pdf (Size: 234.46K)	Environment Agency
R3-022	1	R3-022.pdf (Size: 55.66K)	Samantha Struthers
R3-022	2	R3-022A [R] (Struthers).pdf (Size: 135.07K)	Samantha Struthers
R3-023	1	R3-023.pdf (Size: 56.59K)	Jo ODell
R3-023	2	R3-023A [R] (ODell).pdf (Size: 140.46K)	Jo ODell
R3-024	1	R3-024.pdf (Size: 55.56K)	Brigitte Sutherland
R3-024	2	R3-024A [R] (Sutherland).pdf (Size: 134.14K)	Brigitte Sutherland
R3-025	1	R3-025.pdf (Size: 56.58K)	Keith Payne
R3-025	2	R3-025A [R] (Payne).pdf (Size: 136.11K)	Keith Payne
R3-026	1	R3-026.pdf (Size: 56.41K)	Jane Foot
R3-026	2	R3-026 .pdf (Size: 93.75K)	Jane Foot
R3-027	1	R3-027.pdf (Size: 56.99K)	Sarah Sawyer
R3-027	2	R3-027A [R] (Sawyer) Consultation response Waste (Size: 135.56K)	Sarah Sawyer
R3-028	1	R3-028.pdf (Size: 59.76K)	Kent County Council
R3-028	2	R3-028A [R] (Kent CC).pdf (Size: 135.05K)	Kent County Council
R3-029	1	R3-029.pdf (Size: 56.25K)	Julian Owen

R3-029	2	R3-029A [R] (Owen) Consultation response Waste (Size: 136.6K)	Julian Owen
R3-030	1	R3-030.pdf (Size: 56.56K)	Ashford Borough Council
R3-030	2	R3-030 .pdf (Size: 83.42K)	Ashford Borough Council
R3-031	1	R3-031.pdf (Size: 57.15K)	Southern Water
R3-031	2	R3-031 .pdf (Size: 94.46K)	Southern Water
R3-032	1	R3-032.pdf (Size: 56.35K)	Network Rail
R3-032	2	R3-032 .pdf (Size: 90.07K)	Network Rail
R3-033	1	R3-033.pdf (Size: 56.35K)	Network Rail (Duplicate)
R3-033	2	R3-033 .pdf (Size: 89.52K)	Network Rail (Duplicate)
R3-034	1	R3-034.pdf (Size: 60.39K)	Ibstock Brick Ltd
R3-034	2	R3-034A2 [R] (Ibstock).pdf (Size: 2,977.43K)	Ibstock Brick Ltd
R3-035	1	R3-035.pdf (Size: 57.98K)	Brett Aggregates
R3-035	2	R3-035A [R] (Brett).pdf (Size: 3,250.73K)	Brett Aggregates
R3-036	1	R3-036.pdf (Size: 57.11K)	Mineral Products Association
R3-036	2	R3-036A (MPA).pdf (Size: 205.58K)	Mineral Products Association
R3-036	3	R3-036 .pdf (Size: 128.62K)	Mineral Products Association
R3-037	1	R3-037.pdf (Size: 57.09K)	Roger Smith
R3-037	2	R3-037 .pdf (Size: 80.85K)	Roger Smith
R3-038	1	R3-038.pdf (Size: 58.82K)	Crowborough Town Council
R3-038	2	R3-038 .pdf (Size: 111.14K)	Crowborough Town Council
R3-039	1	R3-039.pdf (Size: 57.1K)	Linda Grange
R3-039	2	R3-039A (Grange).pdf (Size: 148.3K)	Linda Grange
R3-040	1	R3-040.pdf (Size: 56.29K)	Deborah Kalinke
R3-040	2	R3-040 .pdf (Size: 83.29K)	Deborah Kalinke
R3-041	1	R3-041.pdf (Size: 58.66K)	Rother District Council
R3-041	2	R3-041A [R] (Rother DC) Covering letter with signature.pdf (Size: 85.88K)	Rother District Council
R3-041	3	R3-041B (Rother DC) Consultation response Final.pdf (Size: 149.91K)	Rother District Council
R3-042	1	R3-042.pdf (Size: 58.93K)	National Grid
R3-042	2	R3-042A [R] (National Grid).pdf (Size: 171.18K)	National Grid
R3-042	3	R3-042B [R] (National Grid) 29.07.20 E. Sussex CC - Minerals (Size: 67.45K)	National Grid
R3-042	4	R3-042C (National Grid) 29.07.20 E. Sussex CC - Minerals (Size: 536.79K)	National Grid

R3-042	5	R3-042D (National Grid) 29.07.20 E. Sussex CC - Minerals (Size: 814.7K)	National Grid
R3-043	1	R3-043.pdf (Size: 58.35K)	The Dudman Group
R3-043	2	R3-043A [R] (Dudman Group).pdf (Size: 122.4K)	The Dudman Group
R3-043	3	R3-043B [R] (Dudman Group) Local Policies Maps_MAP DIT EAST.pdf (Size: 41.36K)	The Dudman Group
R3-043	4	R3-043C [R] (Dudman Group) Overarching Strategy_POLICY RV1.pdf (Size: 67.22K)	The Dudman Group
R3-043	5	R3-043D [R] (Dudman Group) Providing for Minerals_POLICY RM1.pdf (Size: 59.86K)	The Dudman Group
R3-043	6	R3-043E [R] (Dudman Group)Safeguarding Mineral Resources_POLICY RM3.pdf (Size: 67.67K)	The Dudman Group
R3-044	1	R3-044.pdf (Size: 58.54K)	Polegate Town Council
R3-044	2	R3-044A [R] (Polegate Town Council).pdf (Size: 148.33K)	Polegate Town Council
R3-045	1	R3-045.pdf (Size: 57.51K)	Historic England
R3-045	2	R3-045A [R] (Historic England).pdf (Size: 62.67K)	Historic England
R3-046	1	R3-046.pdf (Size: 57.11K)	Lewes District Council & Eastbourne Borough Council
R3-046	2	R3-046A [R] (Lewes DC (Size: 130.53K)	Lewes District Council & Eastbourne Borough Council
R3-047	1	R3-047.pdf (Size: 61.92K)	Ibstock Brick Ltd (Duplicate)
R3-047	2	R3-047A2 [R] (Ibstock).pdf (Size: 2,977.43K)	Ibstock Brick Ltd (Duplicate)
R3-048	1	R3-048.pdf (Size: 57.33K)	Siou Hannam
R3-048	2	R3-048A [R] (Hannam, S).pdf (Size: 136.27K)	Siou Hannam
R3-049	1	R3-049.pdf (Size: 58.06K)	Brett Aggregates
R3-049	2	R3-049A [R] (Brett) - Copy.pdf (Size: 3,250.73K)	Brett Aggregates
R3-049	3	R3-049B (Brett Aggregates) 2020 07 31 - Brett Response - Needs (Size: 1,918.7K)	Brett Aggregates
R3-049	4	R3-049C(Brett Aggregates) 1 Appendix 1 - Regeneris Critique.pdf (Size: 744.26K)	Brett Aggregates
R3-049	5	R3-049D(Brett Aggregates) 2 Appendix 2 - Sand in Brick Manufacture.pdf (Size: 327.22K)	Brett Aggregates
R3-049	6	R3-049E(Brett Aggregates) 3 Appendix 3 - Day Aggregates Living Roofs.pdf (Size: 867.37K)	Brett Aggregates

R3-049	7	R3-049Info1 (Brett Aggregates) 1. 2013 09 13 - Brett Response to WMSP Call for Sites July 2013.pdf (Size: 32.81K)	Brett Aggregates
R3-049	8	R3-049Info2[R] (Brett Aggregates) 2. 2014 09 05 - Brett Response to WMSP Consultation Draft 2014.pdf (Size: 47.09K)	Brett Aggregates
R3-049	9	R3-049Info3(Brett Aggregates) 3. 2015 12 23 - Brett Response to WMSP Submission Draft 2015.pdf (Size: 21.78K)	Brett Aggregates
R3-049	10	R3-049Info4(Brett Aggregates) 4. 2016 07 15 - Brett Statement of Case to WSMP EiP.pdf (Size: 27.44K)	Brett Aggregates
R3-049	11	R3-049Info5 [R] (Brett Aggregates) 5. 2017 11 20 - Brett R-SF02 Response Form - A4 Edition.pdf (Size: 706.12K)	Brett Aggregates
R3-050	1	R3-050.pdf (Size: 59.43K)	VAS Maddison Ltd
R3-050	2	R3-050A [R] (Maddison).pdf (Size: 75.3K)	VAS Maddison Ltd
R3-051	1	R3-051.pdf (Size: 58.12K)	Mineral Products Association (Duplicate)
R3-051	2	R3-051A [R] (MPA) MPA Comments on East Sussex MWLP Submitted July 2020.pdf (Size: 171.0K)	Mineral Products Association (Duplicate)
R3-052	1	R3-052.pdf (Size: 57.92K)	Marion Thomas
R3-052	2	R3-052A [R] (Thomas, M).pdf (Size: 142.26K)	Marion Thomas
R3-053	1	R3-053.pdf (Size: 58.8K)	Cllr Rob Banks (LDC) & Cllr Sarah Osborne (ESCC)
R3-053	2	R3-053A [R] (Banks Cllr) (Size: 178.66K)	Cllr Rob Banks (LDC) & Cllr Sarah Osborne (ESCC)
R3-054	1	R3-054.pdf (Size: 57.51K)	Rebecca Kemsley
R3-054	2	R3-054A [R] (Kemsley, A).pdf (Size: 135.14K)	Rebecca Kemsley
R3-055	1	R3-055.pdf (Size: 55.73K)	Martin Meadows
R3-055	2	R3-055A [R] (Meadows, M).pdf (Size: 135.9K)	Martin Meadows
R3-056	1	R3-056.pdf (Size: 57.27K)	Kay Woolner
R3-056	2	R3-056A [R] (Woolner, K).pdf (Size: 134.35K)	Kay Woolner
R3-057	1	R3-057.pdf (Size: 56.66K)	Donna Lonsdale
R3-057	2	R3-057A [R] (Lonsdale, D).pdf (Size: 130.46K)	Donna Lonsdale
R3-058	1	R3-058.pdf (Size: 57.01K)	Rosie Phillips-Leaver
R3-058	2	R3-058A [R] (Phillips-Leaver, R).pdf (Size: 133.53K)	Rosie Phillips-Leaver
R3-059	1	R3-059.pdf (Size: 59.6K)	Wealden District Council
R3-059	2	R3-059A [R] (Wealden DC).pdf (Size: 306.25K)	Wealden District Council

R3-060	1	R3-060.pdf (Size: 56.94K)	David White
R3-060	2	R3-060A [R] (White, D).pdf (Size: 139.0K)	David White
R3-061	1	R3-061.pdf (Size: 59.74K)	CPRE Sussex
R3-061	2	R3-061A [R] (CPRE Sussex).pdf (Size: 125.94K)	CPRE Sussex
R3-061	3	R3-061B [R] (CRPE Sussex) FINAL CPRE Sussex Response to ESCC Joint Waste Minerals 2020.pdf (Size: 379.12K)	CPRE Sussex
R3-062	1	R3-062.pdf (Size: 57.26K)	South Downs Society
R3-062	2	R3-062A [R] (South Downs Society) SDS Comments EastSussex Waste and MineralsLocalPlan 03-08-20.pdf (Size: 240.1K)	South Downs Society
R3-063	1	R3-063.pdf (Size: 58.35K)	Day Group
R3-063	2	R3-063A [R] (Day Group) Firstplan for Day Group, Response to East Sussex etc Waste (Size: 452.22K)	Day Group
R3-063	3	R3-063B (Day Group) Document 1 - Day Group Land at North Quay 2615-10b Site Location Plan.pdf (Size: 158.87K)	Day Group
R3-063	4	R3-063C (Day Group) Document 2 - Day Group Land at North Quay Newhaven, Google Maps Extract.pdf (Size: 325.6K)	Day Group
R3-064	5	R3-064.pdf (Size: 56.97K)	Hastings Borough Council
R3-064	6	R3-064A [R] (Hastings).pdf (Size: 208.05K)	Hastings Borough Council
R3-065	1	R3-065.pdf (Size: 58.81K)	Sussex Wildlife Trust
R3-065	2	R3-065A [R] (Sussex Wildlife Trust) SWT response to East Sussex Waste and Minerals Policy Review.pdf (Size: 176.85K)	Sussex Wildlife Trust
R3-066	1	R3-066.pdf (Size: 58.63K)	Woodland Trust
R3-066	2	R3-066A [R] (Woodland Trust).pdf (Size: 114.07K)	Woodland Trust
R3-066	3	R3-066B [R] ESCC Waste and Minerals Local Plan - Woodland Trust response August 2020.pdf (Size: 245.28K)	Woodland Trust
R3-067	1	R3-067.pdf (Size: 59.22K)	Highways England
R3-067	2	R3-067A [R] (Highways England).pdf (Size: 161.16K)	Highways England
R3-068	1	R3-068.pdf (Size: 56.2K)	Steve Guthrie
R3-068	2	R3-068A [R] (Guthrie, S).pdf (Size: 134.78K)	Steve Guthrie
R3-069	1	R3-069.pdf (Size: 57.99K)	West Sussex County Council
R3-069	2	R3-069A (West Sussex CC) East Sussex MWLP review - WSCC response.pdf (Size: 15.31K)	West Sussex County Council
R3-070	1	R3-070.pdf (Size: 59.33K)	Natural England

R3-070	2	R3-070A [R] (NE) 316656 - Natural England response.pdf (Size: 142.36K)	Natural England
R3-070	3	R3-070B [R] (NE) 316656 - Natural England response Additional Info.pdf (Size: 203.01K)	Natural England

DRAFT

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