

## GENERAL APPROACH

- 3.1 The strategy for aggregates supply in the Plan area is set out in the Structure Plan. It is based on the major contribution continuing to be made by imports, especially of marine dredged sand and gravel and crushed rock, delivered to existing wharves in the Plan area. This would be supplemented by supplies of indigenous land won aggregates at a rate consistent with the low level of potential resources, extensive environmental constraints and the extent to which the industry comes forward with specific proposals for extraction. These two prime sources would be augmented by supplies of secondary aggregates and recycled materials.
- 3.2 Data on sales and consumption of construction aggregates in the Plan area is limited by confidentiality constraints, which arise because of the relatively small number of sites in production. However, some conclusions can be drawn as a guide to future policies and proposals.
- 3.3 Firstly, sales of primary aggregates excavated in the Plan area declined from 419,000 tonnes in 1983 to 269,000 tonnes in 1989, and just 50,000 tonnes in 1994, when only building sand was produced. This level of production is a very low figure by regional standards, and it reflects the lack of viable resources, and more recently the impact of the economic recession. Secondly, landings of marine dredged sand and gravel and crushed rock have contributed an increasing proportion of local supply, rising from 1,051,000 tonnes in 1985 to 1,698,000 tonnes in 1989. However, landings declined to only 602,000 tonnes in 1993, again reflecting the effects of poor economic performance on the construction industry.
- 3.4 The consumption of construction aggregates in the Plan area almost doubled from 1,668,000 tonnes in 1983 to 2,945,000 tonnes in 1989, but then declined to 1,763,000 tonnes in 1993. A significant proportion of local consumption is derived from imports, either of marine dredged material or land won aggregates extracted from outside the Plan area.
- 3.5 East Sussex and Brighton and Hove rely heavily on imports to meet demand for construction aggregates. The high levels of consumption associated with the economic boom of the 1980's has been followed by a significant drop in levels of production and demand, reflecting changes in the national economy. Whilst the future requirement for construction aggregates is likely to increase from the current low level of demand, the relative pattern of supply from various sources is unlikely to change with only a small contribution coming from local land won sources.

## AGGREGATES - LOCAL SOURCES

### The Need for Construction Aggregates

- 3.6 Sand and gravel is primarily used for concreting purposes and is an essential raw material for the construction industry. Building sand is largely used in the production of mortars and asphalt. Both types of material can be used for various fill purposes.

### Geological Background

#### *(a) Sand and Gravel*

- 3.7 Concreting sand and gravel is derived in the Plan area from two sources; fluvial deposits and beach deposits. Fluvial deposits consist of sands and gravels laid down by rivers as a result of the normal processes of weathering and erosion and they are most frequently present in river terraces. Areas of river terrace have been identified in the Ouse, Cuckmere and Rother valleys. Where gravels are present, they are derived from the sandstone and ironstone rocks of the High Weald. Most fluvial deposits in the Plan area are overlain by alluvium and the limited geological data available suggests that they do not contain significant quantities of sand and gravel. Only limited exploitation of these materials has occurred in the past, and none since the late 1950s.

- 3.8 Beach deposits are confined to the coast and have their origin in the process of long-shore drift. They consist primarily of flint gravels derived from the chalk. Where present, these deposits can be quite extensive. This source of sand and gravel has been exploited extensively and any future commercial production is most likely to be associated with these deposits.

#### *(b) Building Sand*

- 3.9 Supplies of building sand are obtained solely from the Folkestone Beds within the Lower Greensand formation. This is a narrow outcrop of sandstones and clays, and the potential resource is very limited in extent, occurring in a narrow east-west band to the north-west of Lewes. However the resource is currently exploited commercially.

### Current Production

- 3.10 During the 1980s, production of sand and gravel was confined to beach deposits at the Crumbles (Eastbourne) and at Rye Harbour and Camber. Extraction at the Crumbles ceased in 1989. With the completion of consented operations at Northpoint Beach, Camber in early 1991, there are no operational sites currently in production in the Plan area.
- 3.11 Two large permissions, at Nook Beach and Castle Water, Rye Harbour, have only been partly worked. Extraction ceased at these sites prior to 1983, but some spasmodic working at Fisherman's Walk (part of the Nook Beach permission)

occurred in the late 1980s. It is likely that limited resources of sand and gravel remain within the unworked areas at these two sites. A consent for extraction at Scotney Court, Lydd, which is part of a much larger permission in Kent, was granted in 1990. The potential yield is 935,000 tonnes but the site is unlikely to be worked for 25 years as a result of the phasing of operations.

- 3.12 Since the 1960s only one building sand site, north-west of Lewes at Streat, has operated continuously; reserves here have now been exhausted. In 1990, extraction recommenced at the dormant Novington sandpit, near Plumpton, where there are estimated to be 18 months' reserves remaining at current rates of extraction.

### **Future Provision**

- 3.13 MPG6, "Guidelines for Aggregates Provision in England" sets out national policy on the future supply of construction aggregates. It was published in revised form in April 1994, and includes a requirement for mineral planning authorities to provide, through the grant of planning permissions, a 7 year landbank of each different type of material. Earlier guidance, published in 1989, indicated that in the South East region supplies of all land won aggregates should be maintained broadly at the 1985 level of 31.5 million tonnes per annum (mtpa). Revised economic forecasts forming the basis of the current MPG6 show a reduced annual requirement of about 28mtpa. The Guidelines confirm that land won resources are likely to represent a declining proportion of overall supply over the next 15 years.

**POLICY 2**      **The mineral planning authorities will endeavour to maintain a landbank of reserves of sand and gravel, with planning permission, throughout and at the end of the Plan period, sufficient for at least seven years extraction. They will also endeavour to maintain their contribution to meeting their share of aggregates demand in the region on the advice of SERPLAN unless exceptional circumstances prevail, and in accordance with national guidance.**

- 3.14 MPG6 states that the regional supply figure for land won aggregates should be apportioned to County level. This is to indicate the level of production from local sources to be included in minerals local plans which would achieve the overall regional production figure set out in the Guidance, and ensure adequate supplies for the construction industry. This apportionment is undertaken by SERPLAN and the South East Regional Aggregates Working Party (SERAWP) monitors implementation of the Guidelines.

- 3.15 Data on land won aggregates production in the Plan area, published by SERAWP, is available for 1983, 1985, 1989, 1992 and 1994. During the first three years, average production was in excess of 300,000 tpa, and accordingly the apportionment figure originally adopted for the Plan area was 400,000 tonnes per annum (tpa), by far the lowest in the region. The recent sharp decline in output now makes that figure quite unrealistic; nonetheless the mineral planning authorities accept that some future increase in demand is likely, and have adopted a notional

production figure of 300,000 tpa for the purposes of testing future allocations for land won aggregates in this Plan. This accords with the apportionment figure for the Plan area now agreed by SERPLAN.

3.16 Production from sand and gravel, and building sand sites is not separately identified in the Plan because of low output and confidentiality constraints. However, the paucity of indigenous aggregates resources in the Plan area, and the existence of potential resources in adjoining areas, does not relieve the mineral planning authorities of their obligation to identify opportunities for future production where these exist.

3.17 The Plan therefore identifies suitable sources of construction aggregates in the Plan area to contribute towards the landbank requirement in accordance with Policy 2. This requirement implies a provision for future production as follows:-

Plan Requirement 1996-2006 (10 x 0.3mt)	3.0mt
7 year Landbank at 2006 (7 x 0.3mt)	2.1mt
Total Plan Requirement	5.1mt
<i>Less Permitted Reserves</i>	<i>0.96mt</i>
Total Provision required	<u>4.14mt</u>

3.18 The policies and proposals in the Plan endeavour to provide an appropriate framework for achieving these production levels, although implementation will depend on the industry seeking the appropriate planning consents. MPG6 also makes it clear that it is not the intention that, at the start of the Plan period, full provision should be made for the period beyond 2006 to 2013, although mineral planning authorities need to demonstrate that such resources can be brought forward should this be necessary.

#### **Areas for future Mineral Working**

3.19 Those locations in the Plan area where there is potential for the future working of land won aggregates have been identified. These are areas where resources are likely to be present and where there are no major planning, environmental or other constraints which would preclude development in principle. Within these areas there would be a presumption in favour of extraction, provided that proposals coming forward accord with the other policies in the Plan.

3.20 The starting point for identifying suitable locations is geological data on the natural occurrence of construction aggregates. The mineral planning authorities do not have access to detailed geological data and, accordingly, the British Geological Survey (BGS) supplied maps of the occurrence of fluvial and beach gravels in the Plan area, drawn from their 1:50,000 data base. This has been supplemented by more detailed local information where available.

3.21 The mapped resources were grouped as follows:-

<i>Area A</i>	Lower Greensand (Folkestone Beds)	Building Sand
<i>Area B/C</i>	Lower/Upper Ouse Valley	Mainly Fluvial Gravels
<i>Area D/E</i>	Lower/Upper Cuckmere Valley	Mainly Fluvial Gravels
<i>Area F</i>	Pevensy Levels	Fluvial Gravels
<i>Area G</i>	Combe Haven Valley	Fluvial Gravels
<i>Area H</i>	The Crumbles, Eastbourne	Beach Deposits
<i>Area J/K</i>	Rye Bay and Camber	Beach Deposits

3.22 Available data on the extent and potential quality of the deposits, and past evidence of mineral working, suggested that the fluvial terrace gravels in the Ouse, Cuckmere and Combe Haven valleys, and adjoining the Pevensy Levels, were most unlikely to yield commercial aggregates. Nonetheless all mapped resources were included in a sieve analysis to identify future mineral working areas.

3.23 The major constraints included in the analysis were as follows:-

- Areas of Outstanding Natural Beauty;
- Sites of Special Scientific Interest (SSSI);
- National Nature Reserves (NNR);
- the best and most versatile agricultural land (Grades 1, 2 and 3a).

3.24 Government guidance states that because of the potentially serious impact of mineral development on the environment, proposals affecting AONBs, SSSIs and NNRs must be subject to the most rigorous examination. In addition, considerable weight must be attached to the protection of the best agricultural land.

3.25 The lower Cuckmere valley south of the A27, and the lower Ouse Valley to the north of Newhaven, lie within the Sussex Downs AONB. However the mapped resource is fragmented and unproven, and only limited extraction of material from the foreshore at Cuckmere Haven has been recorded. Elsewhere scattered fluvial deposits have been mapped along watercourses lying within the High Weald AONB. There is no evidence of potential aggregates resources within AONBs in the Plan area.

3.26 Certain mapped resources underlie areas designated as SSSI (all NNRs are designated SSSIs). The only areas where the mineral planning authorities consider that potential aggregates resources are affected by this designation are Rye Bay and Camber. The Rye Harbour SSSI, between Winchelsea Beach and Rye Harbour, protects a large area of shingle ridges and former mineral workings which now have an international importance for wildlife, and there are other historic interests within the resource area. In this case the environmental constraints are considered overriding.

3.27 The Walland Marsh SSSI covers part of the mapped resource area north east of Camber, but the existence of aggregates within the designated part of the area is most uncertain. In addition the only significant locations provisionally classified as grades 1 and 2 agricultural land in the Plan area partly coincide with the SSSI.

The mineral planning authorities have decided to exclude this part of the resource area from further consideration for the following reasons:-

- (a) the existence of two levels of national constraint deserved considerable weight;
- (b) a large part of the resource area to the east extending from Broomhill to the Kent border at Scotney Court is unconstrained and there is better evidence that aggregates resources exist;
- (c) MAFF advises that lower quality land should be worked before the best and most versatile agricultural land.

3.28 The assessment of major constraints during the sieve analysis took account of the quality of the geological information available, and the likelihood that suitable aggregates were present. Two other criteria were examined at a second stage in the analysis:-

- proximity to settlements and sensitive land-uses;
- the availability and standard of access.

These criteria were used mainly to determine in more detail the boundaries of future mineral working areas. From this assessment, broad conclusions were drawn about the potential for future land won aggregates production in the Plan area and the short-list of suitable locations was identified.

3.29 Four main conclusions were reached:-

- (a) potential sand and gravel sites are confined to beach gravel deposits adjoining or close to the coast; the quality and extent of fluvial gravel deposits in the main river valleys is very uncertain and these areas are unlikely to produce commercial quantities of aggregates. Accordingly, the Ouse, Cuckmere and Combe Haven valleys, and the Pevensey Levels, were not considered to have potential for future mineral working;
- (b) aggregates resources are likely to exist at two locations where objections to extraction were considered to be overriding. At Newhaven Eastside, it is clear that there are hydrogeological and local planning reasons mitigating against development, whilst at Rye Harbour strong environmental constraints preclude the inclusion of this area in the Plan;
- (c) there could be some scope for further small scale building sand production although there would be some environmental implications. The mineral bearing outcrop is narrow and occupies an area of visually pleasant countryside adjoining but outside the Sussex Downs AONB. In addition the width and alignment of the local road network is generally substandard and could not safely accommodate a significant increase in HGV traffic;
- (d) overall, the opportunities for further land won extraction in the Plan area are very limited due to scarce resources and strong environmental constraints, and this means that the potential locations for future working

can be quite tightly defined. These locations are the coastal beach deposits between Eastbourne and Pevensey Bay, and a large area of marine sands and gravels north east of Camber, close to the Kent border.

- 3.30 There is one location in the Plan area, Sovereign Harbour Eastbourne, where the extent of potential sand and gravel extraction can be specified with some precision because sufficient geological data is available for this location to be identified as a 'preferred site' for aggregates extraction in the Plan. This approach is also appropriate for the building sand site, because it covers a small area and likely boundaries are known. Elsewhere the available geological data is less precise, and it is appropriate to designate these remaining locations as 'areas of search'.

**POLICY 3** The provision for future sand and gravel extraction in the Plan and shown on the proposals map as inset plans is as follows:-

- (a) Preferred Site
  - ◆ Sovereign Harbour, Eastbourne
  - ◆ Stanton's Farm, East Chilmington
  
- (b) Area of Search
  - ◆ Broomhill North
  - ◆ Scotney Court Extension
  - ◆ Wall Farm

Appendix 2 gives brief details of these allocations and they are shown on the Proposals Map.

- 3.31 There are only limited reserves remaining to be worked at existing and permitted sites. The only large site with planning permission, Scotney Court, is unlikely to commence production during the Plan period, because it forms part of a larger phased permission in Kent. Taken together with these reserves, the areas identified in Policy 3 above could maintain aggregates production during the Plan period and beyond, and a seven year landbank of permissions may be achieved, provided suitable proposals are forthcoming from the industry. However, there are specific site constraints that restrict potential production from these identified areas. The mineral planning authorities do not consider that any other commercial reserves free from environmental or other constraints exist in the Plan area.

**POLICY 4** In the 'preferred areas' and 'areas of search' identified on the proposals map, mineral working for aggregates would normally be permitted provided that:-

- (a) the mineral planning authority is satisfied that there is evidence of viable resources;
- (b) the environmental and traffic impacts of the proposals are acceptable;
- (c) the proposals accord with the other policies in this Plan.

3.32 The mineral planning authorities acknowledge that there may be special circumstances where there is pressure for aggregates extraction outside those areas identified in Policy 3. These could include the review of nationally designated areas and their impact on mineral working, significant change to national and regional policy on aggregates provision, or proposals for extraction at a previously unidentified site where resources are proven and extraction can take place in accordance with the other policies in the Plan.

**POLICY 5** Outside the 'preferred sites' and 'areas of search', proposals for the extraction of aggregates will not be permitted unless the mineral planning authority is satisfied that special circumstances have been demonstrated, and the conditions set out in Policy 4 can be met.

3.33 Commercial mineral working at Sovereign Harbour is dependant upon implementation of a marina-based residential and commercial development which is currently in progress. There are extensive deposits of beach gravels in the area which have been exploited for use as construction aggregates in the past and excavation of the proposed water areas could release further mineral resources, although the extent to which the developer is prepared to exploit the mineral commercially is uncertain. If mineral working proceeds, extraction should be completed within the Plan period.

3.34 The further working of building sand at Stanton's Farm, East Chiltington, should be limited to the field between the existing Novington Pit and the footpath which links East Chiltington and Novington Manor. Proposals for extraction and subsequent restoration should protect the amenities of the area and local residents, and levels of production and restoration works should not generate any significant increase in HGV traffic. Proposals for working east of the bridleway would not be acceptable.

3.35 The remaining 'areas of search' adjoin and together cover land extending eastward from Camber to the Kent border. A number of environmental constraints are likely to influence the rate and extent of extraction from these areas. The release of additional sites will need to be carefully managed to ensure that minerals extraction, and subsequent restoration, does not damage the unique landscape of this part of Romney Marsh. It will also be important to match production capacity from all three areas to the ability of the local highway network to take additional lorries. Proposals should therefore have regard to the timing of improvements to the A259 South Coast Trunk Road, and in particular the construction of a highway relief scheme for Rye. Accordingly the mineral planning authority would support the use of rail freight on the Lydd branch to serve these sites if possible, provided suitable road access to the rail terminal which avoids the built-up area of Lydd can be achieved. The submission of a single overall scheme for aggregates extraction covering these 'areas of search' would be encouraged.

**POLICY 6** Extraction of aggregates within the 'areas of search' at Broomhill North, Scotney Court Extension and Wall Farm will normally be permitted if proposals accord with an overall scheme for the whole area which incorporates the following requirements:-

- (a) total production does not exceed historic levels of production from the Camber area prior to the completion of a highway relief scheme for Rye;
- (b) it can be demonstrated that traffic generated by the proposed mineral workings would not have an unacceptable adverse effect on the amenities of Camber, Broomhill or Lydd;
- (c) restoration proposals reflect the landscape character of Romney Marsh and provide a balance of appropriate leisure, wildlife and agricultural after-uses;
- (d) features of geomorphological interest are safeguarded.

Applicants should demonstrate that the option of transporting aggregate by rail using the Appledore-Lydd branch has been fully assessed.

3.36 The proposed 'areas of search' should be safeguarded from other forms of development that could sterilise the potential mineral resource. This will mean Borough and District Councils advising the mineral planning authority of planning applications within these areas, although, because they are mainly in countryside locations, the number of proposals involved is likely to be small. The method of safeguarding is dealt with in detail in Chapter 8. At Sovereign Harbour, any future mineral extraction is likely to arise as a result of implementation of the marina/housing/commercial development, which already has planning consent, so the need for formal safeguarding is unlikely to apply.

3.37 Between Rye Harbour and Winchelsea Beach, there are areas of land with planning permission for sand and gravel extraction dating back to the early 1950s, where working has ceased but where reserves of mineral remain. The flooded pits resulting from extraction have developed significant wildlife importance and are statutorily protected. The Environment Act 1995 contains provisions to review these early planning consents, and subject to the approval of schemes of conditions in appropriate cases, some further extraction of sand and gravel would be permitted. However, the mineral planning authority does not wish to see continued mineral working in this area, and although the Town & Country Planning Act 1990 includes powers to achieve this objective, it is acknowledged that a permanent cessation of working can best be achieved through discussion with the industry.

**POLICY 7** Under the provisions of the Environment Act 1995, some further sand and gravel extraction is permitted in the area between Rye Harbour and Winchelsea Beach. The mineral planning authority wishes to see the cessation of mineral working in this area, and will initiate discussions with interested parties to achieve this objective.

Consideration will be given to the use of its powers under the Town and Country Planning Act 1990 if necessary.

## AGGREGATES IMPORTS

### Current Situation

- 3.38 Aggregates in the form of marine dredged sand and gravel and crushed rock are imported through the ports of Shoreham, Newhaven and Rye. There are no rail depots in the Plan area to serve the local aggregates market but the county is served by a rail depot receiving crushed rock at Ardingly in West Sussex and by other rail depots outside the Plan area. The three ports receive and process aggregates, including the production of ready-mixed concrete. There is a coated roadstone plant at Mountfield which uses crushed rock imported through Newhaven and occasionally Rye. Processed imported aggregates are distributed from the local ports by road, mostly to serve the Brighton and Hove, and East and West Sussex markets.
- 3.39 The port of Shoreham lies across the Brighton and Hove and West Sussex County boundary and firms from both parts of the port serve the East Sussex and Brighton and Hove aggregates market. The largest aggregates facility in the port lies in West Sussex, but its road access is gained through Brighton and Hove. The Plan is concerned only with policies for the section of the port of Shoreham within the Plan area.
- 3.40 It is estimated that the capacity of the existing facilities for receiving and processing marine dredged aggregates material in the ports of Shoreham (Brighton and Hove and West Sussex), Newhaven and Rye is over 3 million tonnes per annum. Recent throughput has been much lower due to the recession. In 1989, 1.7 million tonnes (mt) of material from UK marine sources was landed at the three ports, but by 1993 this figure had declined to only 0.6mt. Shoreham and Newhaven have shown a capability for handling over 0.5mt of crushed rock aggregates per year in addition to marine dredged material. Small amounts of crushed rock pass through the port of Rye. Marine dredged aggregate materials are mostly utilised for concreting purposes, whilst crushed rock of various types is used locally unprocessed for road construction or similar purposes or subsequently processed for coated roadstone products. However, substitution of marine dredged materials for building sand does not currently occur in the Plan area.
- 3.41 In June 1998 there were two planning permissions for development at Shoreham and Newhaven related to aggregates imports were not yet operational:-
- (a) Shoreham (West Sussex) - Coated roadstone materials plant  
(road access through Brighton and Hove)
  - (b) Newhaven (North Quay) - Coated roadstone materials plant

## Future Prospects

- 3.42 At present concreting aggregates processed from marine dredged material are the main alternative to land won aggregates in supplying regional needs. Studies suggest that the marine dredged supply to the region could increase by up to 40% to 2006 without the need for major capital investment, and MPG6 acknowledges the important role of material from this source. However, environmental constraints, including ecological concerns, and impact on the fishing industry must be taken into account when licences for further dredging are under consideration. East Sussex and Brighton and Hove already rely on marine dredged aggregates to meet much of their construction requirements; during the Plan period the proportion of supply from this source is likely to increase because of the growing shortfall between local supply and demand.
- 3.43 In the longer term, it is likely that crushed rock imported by sea from 'super quarries' in Scotland, Ireland and Norway will play an increasing role in meeting the concreting aggregate needs of the South East region. This operation involves bulk carriers shipping material to regional terminals with deep-water facilities (Thameside or the Solent) for onward distribution to local depots or smaller ports by rail, road or sea. The first such quarry, at Glensanda in Scotland, is already supplying the South East through a terminal on the Thames.
- 3.44 The mineral planning authorities expect the trade in marine dredged material at Shoreham, Newhaven and Rye to be maintained well beyond the Plan period. The Councils believe that supplies from resources within economic carrying distance will be able to sustain the imported aggregates industry at the three ports and utilise the processing capacity that is available. However, the availability of marine dredged resources is outside the control of the mineral planning authorities.
- 3.45 Marine dredging licences are granted by the Crown Estate, but only after the Secretary of State for the Environment has given a favourable 'Government View' on a particular licence application. This 'Government View' may be subject to conditions, and the process involves consultations with interested bodies, including the mineral planning authorities.
- 3.46 The Hastings Shingle Bank is currently the only licensed marine resource close to the Plan area. In 1995 a licence was granted to continue dredging for a further 5 years, with a production limit of 15mt. Not all this material will be landed at the three ports, and other resources (notably the Owers Bank, off Littlehampton) contribute to needs in the Plan area; nonetheless the contribution of the Hastings Shingle Bank is significant.
- 3.47 Shoreham, Newhaven and Rye already trade in crushed rock from distant sources. The future of this trade depends largely on the number of major construction projects likely to take place in the sub-region, and is somewhat uncertain. Significant involvement appears unlikely as long as the trade in marine dredged material remains viable, and licensed resources are replaced. If distant rock imports do gradually replace marine dredged material, the involvement of the ports could depend upon whether it is viable to double handle material at the

regional terminals. It is possible that direct distribution from superquarries to the three ports using smaller vessels may become commercially viable, in which case Newhaven would have the advantage of its rail link for onward distribution within the region.

### Shoreham

- 3.48 Development at Shoreham is constrained by the unsuitability of the main access route to the port through Hove from the regional road network A27/A23. The mineral planning authority would support the preparation of a port development strategy which examines infrastructure requirements and safeguards the future of the port for aggregates imports. In the meantime, as a consequence of decisions by the Secretary of State for the Environment on development proposals in the port, there is an effective prohibition on any further development within the port which would significantly worsen this traffic generated environmental problem in Hove. The Structure Plan states that development relating to the port will normally be allowed "provided that the traffic and transport problems of the area are resolved in an environmentally acceptable manner" and that "appropriate access improvements will be supported".

**POLICY 8** The mineral planning authority supports the retention of the existing facilities for receiving and processing sea-borne imported aggregates at the port of Shoreham. Planning permission for new or improved facilities will normally be granted where it can be shown that the effects of the traffic generated would be acceptable and would not give rise to significant environmental problems in Hove. Proposals should accord with agreed port development policies for Shoreham.

### Newhaven

- 3.49 All aggregates importing activities at Newhaven are located at North Quay. This area has immediate road access to the A26 trunk road and is served by railway sidings linked to the Lewes - Seaford line. The North Quay area is well suited environmentally to aggregates activities and additional land is available. The rail link to Newhaven is a valuable asset which could facilitate the distribution of imported aggregates to the regional market and its retention is supported by the mineral planning authority.
- 3.50 The use of North Quay is constrained by the size of ship which can reach it, tidal wharves and the number of ship movements that can be dealt with on each tide. But these factors should not impede future aggregates operations or their development at North Quay. Access to deep water wharves might be secured in the lower part of the port or by the allocated expansion of that area of land to the east of East Quay and the East Pier. However, the introduction of aggregates activities into sections of the port outside North Quay would raise major issues of port development policy including compatibility between its various sea-borne trades and the provision of highway infrastructure to serve the lower port. It is

therefore not considered appropriate to pursue the possibility of aggregate wharves in the lower port at Newhaven in this Plan.

**POLICY 9** The mineral planning authority supports the retention and further development of facilities for receiving and processing sea-borne imported aggregates at North Quay, Newhaven. Planning permission for new or improved facilities for these purposes will normally be granted within the area shown on the proposals map. The mineral planning authority would normally oppose development unrelated to the receiving and processing of imported aggregates at North Quay with the exception of (a) proposals for the recycling of mineral, demolition and construction wastes and (b) port related uses for which this is the most appropriate location within the port.

**POLICY 10** The mineral planning authority wishes to encourage the use of rail transport for the distribution of aggregates from Newhaven and supports retention of the Lewes - Seaford branch to facilitate the movement of aggregates by rail. At North Quay, Newhaven the railway sidings and direct access to them should be retained. The reorganisation of the sidings to improve the capacity or efficiency of the rail link to provide for aggregates distribution from the port would be supported.

## Rye

3.51 The existing facilities at Rye make a valuable contribution to meeting the aggregates needs of the eastern part of the Plan area, although the recession has reduced throughput at the existing plant and limited visits by the dredger which services the wharf. Any further development of aggregate importing activities beyond present and permitted facilities is likely to raise significant environmental and traffic issues. However, the primary constraints are the small maximum size of vessels able to enter the port and, more significantly, the strictly limited capacity of the port to accommodate visits by commercial ships each year, some 500 visits.

**POLICY 11** The mineral planning authority supports the retention of existing facilities for receiving and processing sea-borne imported aggregates at the port of Rye. The mineral planning authority would only support additional facilities if the need could be demonstrated; the environmental and traffic impacts were acceptable and the port was capable of accepting additional visits by commercial ships without detriment to the established commercial activities and other relevant interests in the port.

## Mountfield Roadstone Plant

3.52 The coated roadstone plant at Mountfield, located within the gypsum mine and manufacturing site, was originally established to take its raw material from the Mountfield mine. The plant no longer obtains its raw material from this source, as crushed rock is imported to the site by road from Newhaven, Rye, Shoreham and Thameside. Although small, this is a valuable facility serving the construction industry in the eastern part of the Plan area. The mineral planning authority would not support any further development at the site which would prejudice the operation of the coated roadstone plant.

**POLICY 12** The mineral planning authority supports the retention of the coated roadstone plant at Mountfield. Favourable consideration would be given to proposals for improving or modernising this facility if the need could be demonstrated and the environmental and traffic impacts were acceptable. The mineral planning authority would support a switch from road to rail transport for the transfer of dry aggregate from Newhaven to Mountfield.

## Rail Depots

3.53 The distribution of sea-borne imports from the port of Newhaven to the regional markets by rail ceased during 1996, but the basic infrastructure remains and the traffic could be reinstated. There are no rail depots within the Plan area for the movement of construction aggregates into East Sussex and Brighton and Hove for local distribution. So far the aggregates industry has shown no interest in developing this category of rail depot within the Plan area. The mineral planning authorities therefore do not regard the provision of such rail depots as a priority, but would support their provision in appropriate circumstances, especially where local benefits would accrue. The Councils would be willing to try and safeguard suitable sites identified by the industry in conjunction with the railway authorities.

**POLICY 13** The mineral planning authorities would support the development of rail depots to receive, process and distribute construction aggregates where the environmental and traffic impacts are acceptable. Such facilities would not be permitted within AONBs unless the need for the development in the local economic and environmental interests and the lack of alternative appropriate sites outside an AONB could be demonstrated. The mineral planning authorities will seek to safeguard suitable identified sites for such depots from other forms of development in appropriate circumstances.

## SECONDARY AGGREGATES

- 3.54 In March 1990, the DoE commissioned Arup Economics and Planning to research the scope for increased use of secondary and recycled aggregates. The resulting report "Occurrence and Utilisation of Mineral and Construction Wastes" (1991) examined mineral wastes (such as china clay sands, minestone and slate waste), power station ash and steel making slag, and demolition and construction industry waste. It concluded that the potential for greater use of these materials to reduce the need for primary extraction was inhibited by transport costs and consumer resistance and that the resulting environmental benefits may only be achieved through financial incentives. However, recent studies have re-emphasised the potential benefits from the use of these materials.
- 3.55 MPG6 specifically encourages the increased use of secondary and recycled materials in the construction industry. Planning authorities are advised to pursue policies to facilitate the use of these materials where this is environmentally and economically acceptable; the guidance also suggests that development plans should identify sources of raw materials where these exist and include policies to control recycling operations. The overall objective is to increase the use of secondary and recycled materials as aggregates in England from 30mtpa at present to 55mtpa by 2006.
- 3.56 The Government has announced a number of measures to support this target for secondary aggregate production and has re-affirmed its importance in "Sustainable Development - The UK Strategy" (1994). Secondary materials could make a significant contribution to developing a sustainable approach to minerals development, and Government incentives to increase their use will be supported.
- 3.57 The County Council and Brighton and Hove Council have jointly a Waste Strategy which provides the context for Structure Plan waste policies and the Waste Local Plan; it will also implement the emerging National Waste Strategy. Initiatives for recycling construction and demolition waste, including waste processing targets, form an important element in the Strategy. New Structure Plan policies are also likely to include recycling targets and locational criteria will be dealt with in the Waste Local Plan.
- 3.58 With the exception of construction and demolition waste, the Plan area is remote from most sources of these wastes. Reject rock from gypsum mining near Robertsbridge is used as a low grade fill, but poor quality inhibits its widespread use as a secondary aggregate. However, it has a value as a substitute for primary aggregate of a greater value, such as chalk. There is also scope for greater use of recycled construction and demolition wastes such as road planings and concrete for aggregate purposes. This Plan will encourage the re-use of these materials and the development of facilities for the recovery of secondary aggregates in appropriate locations.
- 3.59 Currently, processing of these materials involves crushing and screening, and dust and noise can arise unless adequate controls are in place; levels of traffic generation may also be high. Facilities should be located close to both the source of material, and the market which in the case of the area covered by the Plan is

likely to be within urban areas or associated with highway projects. Such facilities are best located at appropriate sites in industrial areas, including the ports (subject to constraints identified at Shoreham and Rye), or within or adjacent to existing mineral workings and waste disposal sites where overall impact on amenity can be minimised. The mineral planning authorities will also support the inclusion of secondary aggregate processing facilities in new minerals and waste developments, and the re-use of minerals waste wherever possible.

**POLICY 14** The mineral planning authorities will support recycling facilities which increase the re-use of mineral, construction and demolition wastes in appropriate industrial areas including those at the ports of Newhaven, Shoreham and Rye, and in existing and new mineral and waste disposal sites. Proposals should accord with the following criteria :-

- (a) they should not cause unacceptable impact on residential areas or other sensitive land uses;
- (b) there should be minimal landscape impact and sites should be well screened;
- (c) they should accord with the constraints on further development identified at the ports of Shoreham (Policy 8) and Rye (Policy 11);
- (d) the environmental and traffic impacts of the development must be acceptable and the proposals consistent with the other policies in this Plan.