

REPRESENTATIONS ON THE EAST SUSSEX COUNTY COUNCIL AND BRIGHTON & HOVE COUNCIL WASTE & MINERALS CORE STRATEGY: PREFERRED STRATEGY

of PILTDOWN ACTION AGAINST LANDFILL (PAAL)

January 2010

EXECUTIVE SUMMARY

PAAL accepts that there is a pressing need for waste disposal but strongly objects to Policies C3, C5a and C6 in the Preferred Strategy, specifically the principle of landraise on Greenfield sites in the Low Weald and the use of the Newick/Piltdown 'Opportunity Area' identified.

The Preferred Strategy does not meet the requirements of the South East Plan (SEP) in terms of waste recovery targets and has excluded consideration of Brownfield land in AONBs and National Parks ahead of Greenfield sites. This approach is not in accordance with Government planning policy guidance.

The County Council should make every effort to (1) increase the percentage of waste recovery and reuse to the very highest possible levels, well in excess of minimum requirements of the SEP, and (2) to drive the delivery of Brownfield sites for land disposal, in particular Ashdown Brickworks, or alternatives, including those within the AONBs if necessary.

On behalf of **PAAL**, Enplan (planners, landscape architects and environmental consultants) has studied the Scott Wilson Land Identification Study (October 2009). This report identifies an Opportunity Area at Newick/Piltdown (the OA) but notes that it is a "borderline" site subject to detailed assessment. Enplan advise that this OA should not have been included and that this study is unreliable and flawed as follows:

- Land ownership has played no part in the assessment
- County Officer's should not have advised Scott Wilson to exclude AONBs and NPs
- Lack of geological evidence in the work
- Stage 1 assessment sets a 500m buffer for "valued environments" but Scott Wilson have not applied buffers to the valued environments of Ancient Woodland or Listed Buildings
- Sensitivity testing should have been applied to some of the criteria and 1km applied to all settlements
- Lack of transparency at Stage 2 assessment as to why certain OAs survived the minimum 25ha test and why others failed
- Stage 3 ground based assessment for the 31 OAs was undertaken in two days – about half an hour per site! No expert highway or ecological expertise was used at this stage and the Assistant County Archaeologist only assessed the five "most suitable" OAs
- Not a single OA was categorised as Green on their traffic light system. The five were selected from the Amber category which are subject to significant constraints

