

**CONFORMED COPY
OF THE PRINCIPAL CONTRACT DATED 31ST MARCH 2003
AND THE AMENDMENTS TO THE PRINCIPAL CONTRACT
PURSUANT TO THE DEED OF AMENDMENT DATED 28TH MAY 2003**

SCHEDULE 36

**SUPPORTING DOCUMENTS FOR BENCHMARKING
PLANNING APPLICATIONS AGAINST**

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EAST SUSSEX COUNTY COUNCIL
&
BRIGHTON & HOVE CITY COUNCIL

Energy from Waste Facility

“to design a high quality facility”

By J.R. MAZAUD : S’PACE S.A. d’Architecture

January 2002

ONYX Aurora Ltd appointed S’PACE Architects to undertake outline designs for the proposed Energy from Waste Facility in Newhaven, East Sussex.

The selected “ARAM Resources” Site at the Northern end of the North Quay Road in Newhaven gives a very unusual importance to the architectural and setting up choices for various reasons:

- **Historical**: a site dedicated to storage of a variety of materials but not to high-level construction.
- **Geological**: the presence of a thick sequence of superficial deposits overlying the chalk at depths of around 30m, the proximity of the river Ouse, tidal and navigable, the flood and subsequent erosion risk.
- **Ecological**: the existing landscape, AONB, expected close proximity to National Park in 2003, suggests a requirement to minimise impact on wildlife and, if possible, enhance it.
- **Panoramically**: the hilly relief concerning Newhaven itself but also the distant town of Lewes creates a “Shop-window” effect in which the plant itself becomes the “star”.
- **Psychological**: the sight offered to the local population, just from their houses, can be either positively spectacular or unfortunately disturbing through industrial damaging evidences.

A conceptual approach based on “sustainable development” principles among which popular adherence is the determining factor, lead to a technical decision to bury a small proportion of the plant. In fact, the furnace itself will be buried within a circular silo, next to a second circular silo dedicated to waste storage as a usual waste reception and storage bunker; both at a depth circa 20m.

This radical attitude allows a general shape participating to a calm and dispassionate atmosphere. NO industrial fatality, NO “Square Vision”, NO more visual contamination.

The main design principles are as follows:

- There is no “throw away” view or less important side of the plant
- The curved roof reaches the ground in the form of open steel frames. This curved roof reduces the impact of the plant when seen from a distance. The colours and materials used do not attempt to hide the building in the landscape on the sky or when viewed locally or from a distance, rather the building form, materials and colours combine to present an appearance, which is in harmony with its surroundings.
- The height of the plant is controlled to be the minimum necessary to accommodate the process equipment, likely to be no more than 24m (thanks to the buried solution).
- The chimney is screened for half its height, being absorbed within the building itself. It is steel walled and finished in silver anodised aluminium to reflect the prevailing sky condition. This, together with its slender proportion, occupies a minimum presence on the skyline.
- Noise and dust generating activities are within the heart of the complex to minimise their effect on the surroundings.
- The plant superstructure is of steel frame construction covered with lightweight metal cladding or textile. The use of steel rather than reinforced concrete allows a significantly shorter construction time and results in a less overbearing appearance.
- The facade materials and colours are used to emphasise the quality and the control of the process.

The EfW building does not proclaim itself to be a landmark. It is designed to carry itself with dignity, civility and with respect for its surroundings.



East Sussex and Brighton & Hove Integrated Waste Management Contract

Planning and Environmental Supporting Document
Best and Final Offer

January 2002


Integrated Waste Management

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1.0 INTRODUCTION

- 1.1 This paper has been prepared to support the Onyx Aurora Ltd. Best and Final Offer (BAFO) submission and focuses on planning and environmental issues associated with the tender process.
- 1.2 The paper focuses on the principal policy issues influencing the choice of options and provides a preliminary assessment of the planning and environmental issues arising at each of the sites proposed for waste management facilities.

2.0 PLANNING AND ENVIRONMENTAL POLICY GUIDANCE

- 2.1 Onyx proposes to deliver an integrated waste management system to manage the combined waste arisings in East Sussex and Brighton & Hove (referred to hereinafter as the Plan area). The formulation and refinement of the strategy has been strongly influenced by available policy guidance from a European to local level, which is set out below:

EU Legislation

Waste Framework Directive (75/442/EEC)

- 2.2 This Council Directive establishes a set of community rules on waste disposal. It requires Member States to take appropriate measures to encourage (i) the prevention or reduction of waste production and its harmfulness and (ii) the recovery of waste.

Landfill Directive (1999/31/EC)

- 2.3 The EC adopted the European Landfill Directive in July 1999. Based on the Directive's requirements, individual EU member states then set targets that were incorporated into national legislation. The purpose of the Directive is to minimise the adverse environmental impacts of landfill, particularly landfill gas emissions, surface and groundwater pollution and land contamination.
- 2.4 The most important aspect of the Directive emphasises the need to reduce significantly the amount of biodegradable municipal solid waste (MSW) disposed of by landfill. By 2016 (2020 for the UK), member states must reduce the weight of biodegradable MSW landfilled to 35% of 1995 levels.
- 2.5 In order to comply with the Landfill Directive, the UK will need to make extensive changes to the way it currently manages waste. If the UK aims to achieve the ambitious diversion targets, there will be a need to expand the number of current waste treatment facilities and develop alternative solutions.

UK National Waste Policy

- 2.6 UK waste policy reflects the Government's response to international conventions and European Directives. The key document is the National Waste Strategy 2000.
- 2.7 Waste Strategy 2000 states the Government's wishes for waste management development over the coming years. It calls for a significant reduction in the use of landfill and advocates adherence to the 'Waste Hierarchy'. This is a well-established waste management framework that first considers opportunities for waste reduction (or waste minimisation), followed by reuse, then recovery and finally landfill disposal. This final option in the waste hierarchy, incorporating

landfill and incineration without energy recovery, is considered the ‘last resort’ option when all other options in the waste hierarchy have been fully exploited.

2.8 The national strategy then sets the following national targets in relation to MSW diversion for the various forms of waste recovery (Figure 2.1):

Date	Government Target (Waste Strategy 2000)
2003	Double 1998/99 household recycling rates
2005	Recycle/compost 25% of household waste Recover value from 40% of MSW (inc. above target) Reduce the weight of landfilled commercial and industrial waste to 58% of 1998 levels
2010	Recycle/compost 30% of household waste Recover value from 45% of MSW (inc. above target)
2015	Recycle/compost 33% of household waste Recover value from 67% of MSW (inc. above target)

Figure 2.1: Government recycling and recovery targets, based on the Landfill Directive.

2.9 The Department of Environment, Food and Rural Affairs (DEFRA) have recommended household recycling rates for all waste collection authorities (including East Sussex and Brighton & Hove) based on the above national targets. For East Sussex and Brighton & Hove, the recycling target for 2003 is to double the existing rate of 9.5% to 19%. A recent report on the responses to the first draft of the East Sussex and Brighton & Hove Waste Local Plan (WLP), however, recommends more ambitious recycling targets for household waste. This report recommends that the second deposit WLP sets higher targets and increases the recycling rate to 20% by 2003, 30% by 2005, 33% by 2010 and 40% by 2015.

2.10 With respect to the diversion of biodegradable waste from landfill, in 1995 a total of 204,000 tonnes of biodegradable waste was sent to landfill in East Sussex and Brighton & Hove. Based on this baseline figure and the Landfill Directive requirements, Waste Strategy 2000, has in effect, set the following landfill limits for biodegradable waste in East Sussex and Brighton & Hove (Figure 2.2):

Year	Landfill Directive requirements	Landfill limit
2010	Reduce biodegradable waste to 75% of 1995 levels	153,000 tonnes/year
2013	Reduce biodegradable waste to 50% of 1995 levels	102,000 tonnes/year
2020	Reduce biodegradable waste to 35% of 1995 levels	71,000 tonnes/year

Figure 2.2: Landfill limits for biodegradable waste in the WLP area.

National planning policy

2.11 Planning policy guidance notes (PPG’s) communicate the Government’s guidance on planning policy. Although various guidance notes are relevant to planning for

waste management, PPG10 ‘Planning and Waste Management’ is the principal source of policy guidance in this context.

PPG10- Planning and Waste Management

2.12 PPG10 sets out the following four key criteria for consideration in the development of any waste management strategy:

- *Best Practicable Environmental Option (BPEO)* – a procedure that compares various scenarios for a given set of objectives, in order to establish the option that provides the most benefits and the least damage to the environment.
- *Regional Self-Sufficiency* – waste produced within the East Sussex and Brighton & Hove Plan area should, where practicable, be treated or disposed of in the Plan area.
- *The Proximity Principle* – waste should be managed as near as possible to its place of production, thereby minimising transportation distances and resulting emissions.
- *The Waste Hierarchy* – as described above, the waste hierarchy is a theoretical waste management framework, whereby decision-makers must first consider opportunities to reduce the generation of waste by minimisation followed by reuse, recovery and final disposal.

Regional Planning Guidance (RPG 9)

2.13 Regional Planning Guidance for the South-East (RPG 9) was published in May 2000 and contains regional waste management policy guidance. Paragraph 10.14 of RPG 9 confirms that the Landfill Directive is presently the key driver to reduce the amount of waste that requires final disposal to landfill. It also states:

“It will require a substantial amount of municipal waste to be diverted away from landfill towards composting, recycling, energy from waste and other waste management technologies.”

East Sussex and Brighton & Hove Waste Local Plan First Deposit Draft

2.14 The first deposit draft of the WLP was published in November 2000. It has been a key document in formulating the proposed waste management strategy. A number of policies are relevant to the use of EfW in the strategy.

2.15 Policy WLP1, the plans strategy, states that proposals shall:

“a) represent the best practical environmental option (BPEO) with regard to the waste hierarchy and the proximity principle

b) reduce the proportion of untreated waste so that only treated waste is disposed of to land

c) form part of an integrated strategy for waste management and contribute to meeting or exceeding the following targets for the Plan area:

- Recycling 19% of household waste by 2003
- Recycling 25% of household waste and recovering 40% of municipal waste by 2005
- Recycling 30% of household waste and recovering 45% of municipal waste by 2008
- Recycling 33% of household waste and recovering 50% of municipal waste by 2011

d) include the co-location of waste facilities, where appropriate.”

3.0 ONYX’S PROPOSED STRATEGY

3.1 Onyx is proposing an Integrated Waste Management Strategy (IWMS) to deliver a sustainable solution for waste generated in the East Sussex and Brighton & Hove Plan areas. This integrated strategy contains a number of elements, all of which play a vital role in delivering the strategy. The main facilities together with the proposed capacities and operational details are shown in figure 3.1:

Facility	Location	Capacity	Date
‘Green Waste’ Composting plant	Golden Cross, Hailsham	45,000 tpa	2005
Materials Recovery Facility	Hollingdean Depot, Brighton	100,000 tpa	2004
Energy from Waste Facility	North Quay, Newhaven	225,000 tpa	2007
Waste Transfer Station (north)	Maresfield Camp, Uckfield	40,000 tpa	2005
Waste Transfer Station (east)	Pebsham RDF Plant	75,000 tpa	2007
Waste Transfer Station (west)	Hollingdean Depot, Brighton	100,000 tpa	2004
New Technology Facility	Pebsham RDF Plant	75,000 tpa	2012

Figure 3.1: Main facilities for the proposed waste management strategy.

3.2 As well as the above core proposals, the Onyx strategy includes a number of supporting facilities, including a network of household waste recovery sites (HWRS). Such supporting facilities are vital to the overall Strategy as they will ensure that the Government’s recycling targets (which ensure compliance with the EU’s Landfill Directive) are met. These facilities are planned for the following locations:

District/Borough	Location
Lewes	Lewes, Newhaven and Seaford
Wealden	Crowborough, Forest Row, Hailsham, Heathfield, Uckfield and Wadhurst
Eastbourne	Eastbourne
Hastings	Pebsham
Rother	Mountfield

Figure 3.2: Proposed locations for the Household waste recycling sites.

3.3 Figure 3.3 illustrates the proposed locations of the waste facilities in East Sussex and Brighton & Hove, together with the strategic transport network.

EAST SUSSEX COUNTY COUNCIL AND BRIGHTON & HOVE COUNCIL JOINT INTEGRATED WASTE MANAGEMENT SERVICE

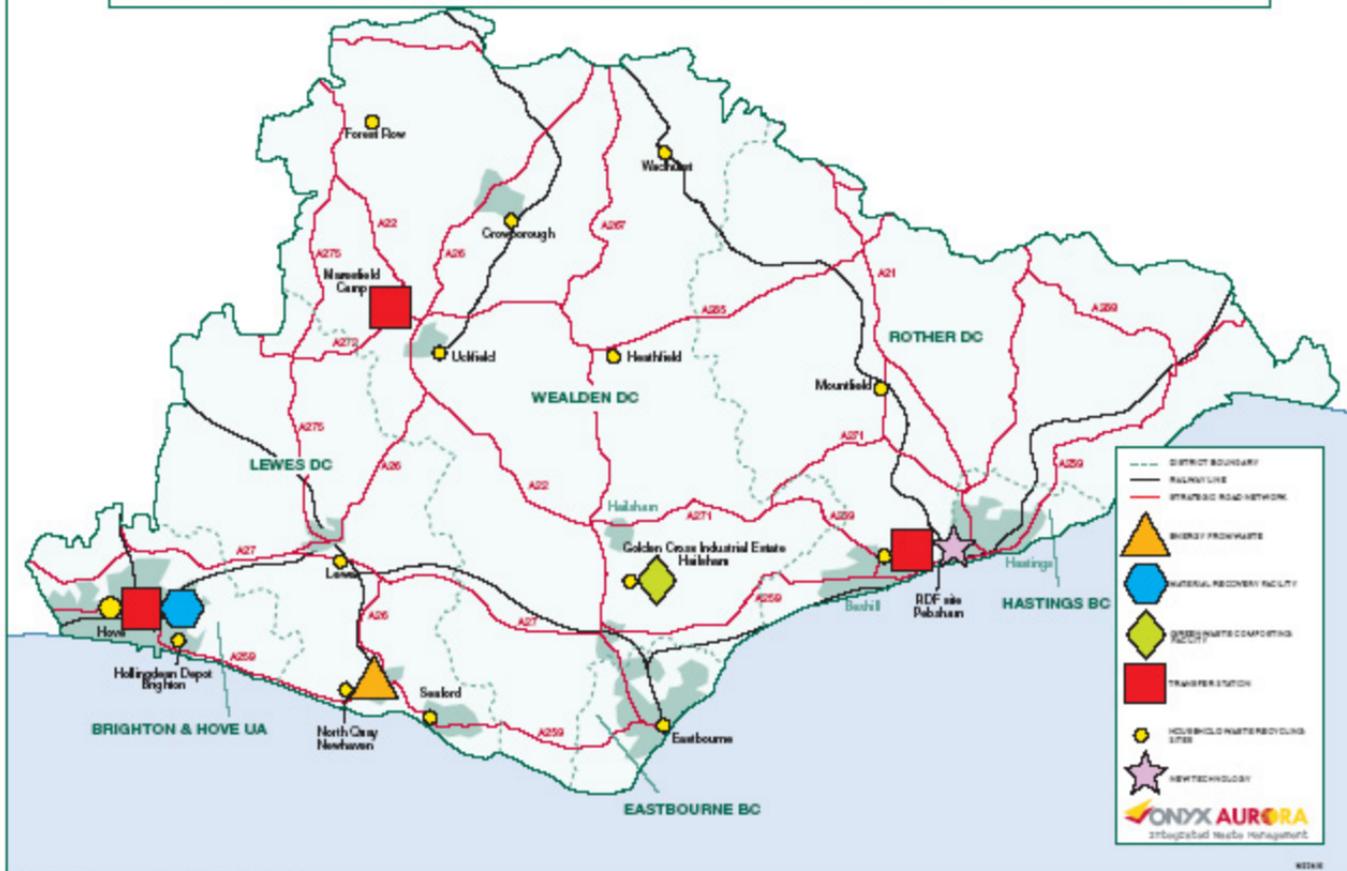


Figure 3.3: Proposed waste facility locations

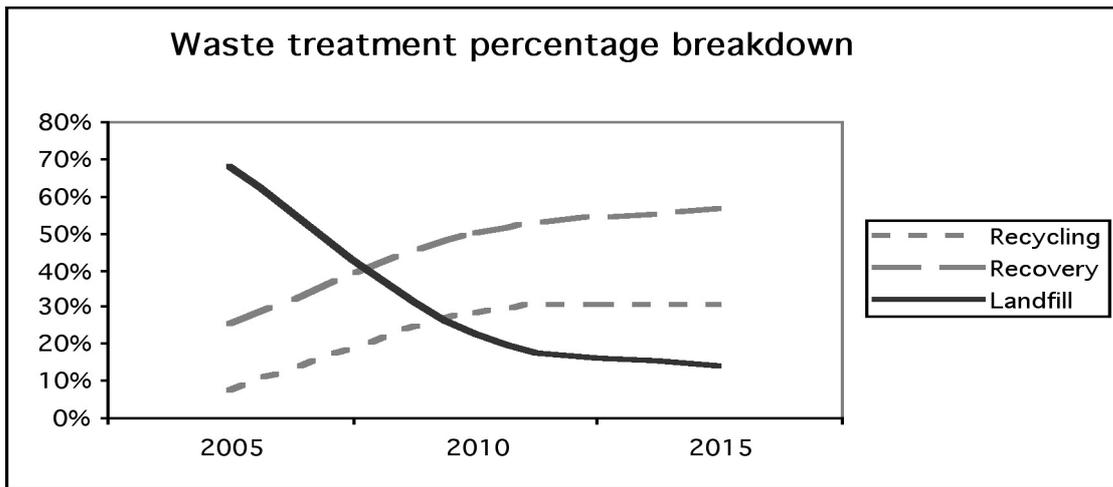


Figure 3.4: Breakdown and evolution of the proposed waste management processes for the duration of the Strategy.

3.4 The main objective of the strategy is to minimise the weight of waste sent to landfill, whilst recycling and recovering as much of the waste resource as practically possible. Onyx has achieved this through gradually increasing the proportion of waste that is both recycled and recovered. Figure 3.4 illustrates the proportion of waste which is recycled (including composting), recovered (including EfW) and disposed (landfill) at specific points in the contract period.

4.0 PLANNING AND ENVIRONMENTAL JUSTIFICATION FOR THE STRATEGY

- 4.1 The proposed Strategy is based on current policy and guidance, which has influenced the development of the Strategy in all areas, from the examination of the various waste management techniques and the selection of the appropriate technologies and facilities, to the siting of the waste infrastructure. The compliance with policy and guidance is summarised below:
- 4.2 The Incineration Directive has been central in guiding the development of the recycling and recovery targets. Apart from a small shortfall (approximately less than 10%) in the initial years of the contract period, the strategy will exceed all recycling and recovery targets as specified in the waste contract. The small shortfall is due to the time required to deliver the waste facilities and infrastructure, which enables waste to be diverted from landfill.
- 4.3 The principles contained in PPG10 have guided the choice and size of the recycling and recovery facilities. Paragraph A1 of PPG10 lists the following five matters for waste planning authorities (WPAs) to consider when making planning decisions on waste management projects:
- the current national waste strategy (i.e. Waste Strategy 2000)
 - the BPEO
 - local and regional requirements for the management and disposal of waste
 - the characteristics of the area and proposed waste management sites, and
 - other relevant national, regional and local policies.
- 4.4 The proposed Strategy adheres to the key principles set out in PPG10. In particular, the proposals envisage that all household waste arising in the areas administered by East Sussex County Council and Brighton & Hove Council be managed and disposed of within the combined area. This ensures that the Strategy is consistent with regional self-sufficiency.
- 4.5 The proposed locations of the facilities in the Strategy have been selected with the proximity principle in mind. This ensures that the waste transportation distances are minimised wherever practicable.
- 4.6 The Strategy proposes facilities to implement all aspects of the hierarchy from waste reuse, recovery (recycling, materials recovery, composting and energy recovery) to disposal (landfill).
- 4.7 The BPEO for the Plan Region is difficult to define due to the inherent uncertainties of deciding what is the best option, and also due to the lack of clarity in PPG10 on the exact definition of BPEO. However the use of life-cycle analyses may help in choosing the best waste management strategy. The Environment Agency has helped to develop a computer model called WISARD, which

performs a life-cycle analysis on various waste options and volumes. The results for the East Sussex and Brighton & Hove's waste arisings show that EfW as part of a waste strategy is preferred from a BPEO perspective. When the Environment Agency used WISARD based on waste arisings from the southeast region of England, EfW was found to be an essential part of any waste strategy.

- 4.8 The combined household waste arisings of the two authorities are sufficient to justify the number and scale of the facilities proposed in the Strategy. Together these will provide a robust waste management system for the duration of the waste contract and beyond.
- 4.9 The proposed Strategy is in accordance with policy WLP1 of the East Sussex and Brighton & Hove WLP deposit draft, which outlines the key principles that any proposed strategy must consider.
- 4.10 Non-statutory guidance was also used in the development of the Strategy, in particular, publications from both the NSCA and the Environment Agency.

National Society for Clean Air and Environmental Protection (NSCA): 'Public Acceptability of Incineration'

- 4.11 This document was published in May 2001 based on research undertaken by the NSCA, a society that provides information, training and campaigns on air pollution, noise and environmental protection issues. Its membership is made up largely of organisations with a direct involvement in environmental protection, including industries, local authorities, academic and professional institutions, environmental consultancies and regulatory agencies.
- 4.12 The document examines many aspects of waste incineration, including policy, technology, operation, impacts on recycling, public acceptability, perceived and actual health risks and global prevalence of incineration. It attempts to address the many issues surrounding incineration as a method of treating waste and to provide some new insights into its use in the UK.
- 4.13 A key issue the document examines is the impact of incineration on recycling:
- “Evidence from other countries where incineration with energy recovery is widely used show that high level materials recycling and composting can be achieved alongside it. This is in part because some of the materials which are commonly recycled- ferrous and non-ferrous metals, glass- are not combustible, while diverting wet organic wastes from kitchens and gardens for composting improves the calorific value of the remaining waste, despite reducing the mass.”*
- 4.14 Annex 3 to NSCA's document contains detailed information on the results of a Life Cycle Analysis undertaken to evaluate the potential environmental impacts associated with the whole life-cycle of all waste in East Sussex and Brighton &

Hove. The computer software package called WISARD (referred to above) was used to evaluate the various environmental impacts. For the assessment, two scenarios were considered: one based on landfill disposal and the other based on incineration. The latter scenario was based on a single 250,000 tonnes per year incinerator, which is very similar to the 225,000 tonnes per year facility currently proposed by Onyx.

- 4.15 The results, comparing both scenarios, showed that there are significant environmental gains in using incineration in the waste strategy. The WISARD assessment calculates the 'avoided burden' (reduced environmental impact) of both options, and has found that incineration avoids greater burdens than landfill strategies. In particular, incineration has a better environmental performance in comparison to landfill in terms of non-renewable resources (ores and primary energy consumption), air pollution (acidification and metals), greenhouse gas 'savings', water pollution and waste production.

Strategic Waste Management Assessment (SWMAs) of the South East- Environment Agency (2000)

- 4.16 In November 2000 the Environment Agency published its first SWMAs for England and Wales, the contents of which underpin the National Waste Strategy. There are 10 SWMAs, one each for Wales and London and the remaining eight for the eight English regions, including the southeast region.
- 4.17 The SWMAs contain various projections that aim to demonstrate the scale of the changes and new waste management facilities required to comply with the targets set in Waste Strategy 2000.
- 4.18 Each projection is based on a particular 'mix' of waste management options including recycling, composting, EfW and landfill. Two such projections have been calculated in the Strategic Waste Management for the southeast. Each projection has assumed waste growth rates of 1% and 3%.

Base Case Projection

- 4.19 The Base Case projection assumes that recycling continues at current rates and that no additional incinerator capacity is provided. The waste option mix for the base case in 2020 is:

- Landfill 86.0%
- Recycling/composting 12.5%
- Incineration 1.5%

- 4.20 However, according to the SWMA this mix of waste options would "not meet either the landfill diversion or recycling targets at either of the rates of growth". Recycling increases in line with the growth in waste produced, but is still not

adequate to divert sufficient biodegradable MSW from landfill to meet Waste Strategy 2000 targets.

Recycling Projection

4.21 This projection utilises the “maximum practicable levels of recycling and composting”, which the Environment Agency has selected. EfW facilities are implemented in this projection to meet the Landfill Directive requirements, but only when the potentials of recycling and composting have been exhausted. This projection assumes that recycling and composting increase rapidly (at approximately 15% per annum) until the maximum amount of recoverable material is extracted from the MSW.

4.22 This recycling projection has the following waste option mix:

- Recycling 33.8%
- Incineration 33.5%
- Composting 7.9%
- Landfill 24.8%

4.23 Based on the above waste option mix, the Environment Agency has also estimated the number of waste facilities required in the southeast region to achieve this waste option mix.

Facilities required	1% waste growth	3% waste growth	Average capacity of each facility
EfW plants	4	8	300,000 tpa
Materials Recovery Facilities	23	41	50,000 tpa
Composting plants	21	31	20,000 tpa

Figure 4.1: Mix of waste facilities required, based on a maximum recycling strategy, to meet the Landfill Directives diversion targets.

4.24 The rapid increase in recycling and composting (15% per annum) meets the Landfill Directives requirements. This will result in an overall recycling rate of 41% in 2010. However, the recycling rate will eventually reach a practical maximum and any further growth in the recycling rate would be matched by the projected increase in waste production.

4.25 The implementation of the above projection still requires a number of new waste facilities. The exact number depends on the rate of growth in waste production. EfW is an important component of this waste projection and is necessary to meet the Landfill Directives targets.

4.26 The two projections outlined above illustrate the potential waste management options and the resulting facilities required to meet the Landfill Directives targets

in the southeast. The key point to note here is that a full complement of facilities and options is required to meet the Directive's requirements.

5.0 WASTE MINIMISATION

- 5.1 Waste minimisation is at the top of the waste hierarchy and is therefore the initial option that will be promoted by Onyx as part of its Strategy. Onyx intends to appoint both a Waste Minimisation Officer and an Education & Communications Officer to spearhead its attempts to reduce the volumes of waste arising in the Plan area. Onyx also intends to co-operate with various consumer and commercial groups to reduce production and consumption of unnecessary packaging.
- 5.2 Onyx is gaining considerable experience in waste minimisation from its existing waste contracts in Hampshire and Sheffield. The success and lessons learned in these waste minimisation programmes will be incorporated into the programme for East Sussex and Brighton & Hove.

6.0 WASTE RECYCLING

- 6.1 Achieving the statutory recycling targets is at the core of the proposed Strategy. These will be achieved through a combination of kerbside collections, household waste recycling sites (HWRS), bring banks, waste transfer stations (WTS) and a materials recovery facility (MRF). The network of HWRSs will allow both rural and urban populations of the Plan area to 'bring' materials they wish to recycle to the facility for deposit in designated containers. This approach allows Onyx to exercise a high level of control over segregation of materials entering and leaving the facilities.
- 6.2 The strategic location of WTSs in the northern, eastern and western parts of the Plan area is designed to minimise the transportation distances of materials moved from the HWRSs to the WTSs. By transporting materials to these bulk holding sites, Onyx will maximise the waste payloads that will be sent for final treatment, recovery and disposal. The MRF is where materials will be separated and sent for reprocessing. Onyx has six operational WTSs in the south of the UK handling 367,000 tonnes of waste per annum. There are also three MRFs under Onyx's control, handling 70,000 tonnes of waste per annum. Figure 6.1 illustrates the waste recycling process.
- 6.3 All composting activities are classified as recycling and are included in the overall recycling volumes. The composting process will operate by collecting garden waste from the appropriate HWRS or WTS and sending it to the composting facility for processing.
- 6.4 The compost product would be marketed locally to growers and horticulturists. Onyx has extensive experience of developing and managing composting on this scale through their operations in Hampshire, where compost is successfully sold to local markets. Currently in the UK, Onyx is handling 107,000 tonnes of green waste per annum at seven operational sites. The proposed composting facility in East Sussex is proposed to have an annual capacity of 45,000. Figure 6.2 illustrates the waste composting process.
- 6.5 Recycling would account for approximately 82,000 tonnes of waste generated in the Plan area in 2005. This would rise to 130,000 tonnes by 2010 and 148,000 tonnes by 2015. By 2015, recycling would consist of a number of separate components including HWRS (9%), 'Bring banks' (6%), paper (13%), EfW recycling (1%) and new technology recycling (1%).

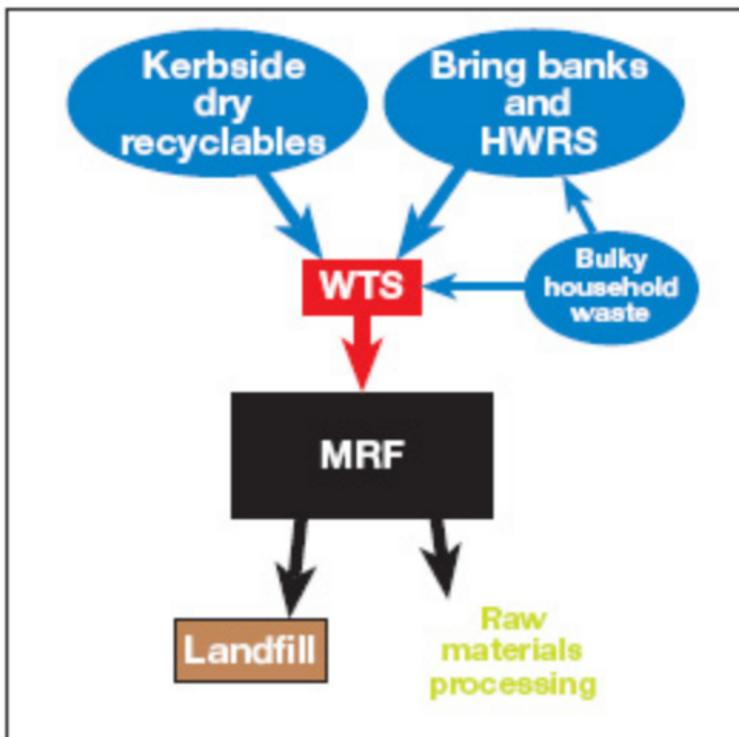


Figure 6.1: Waste recycling process

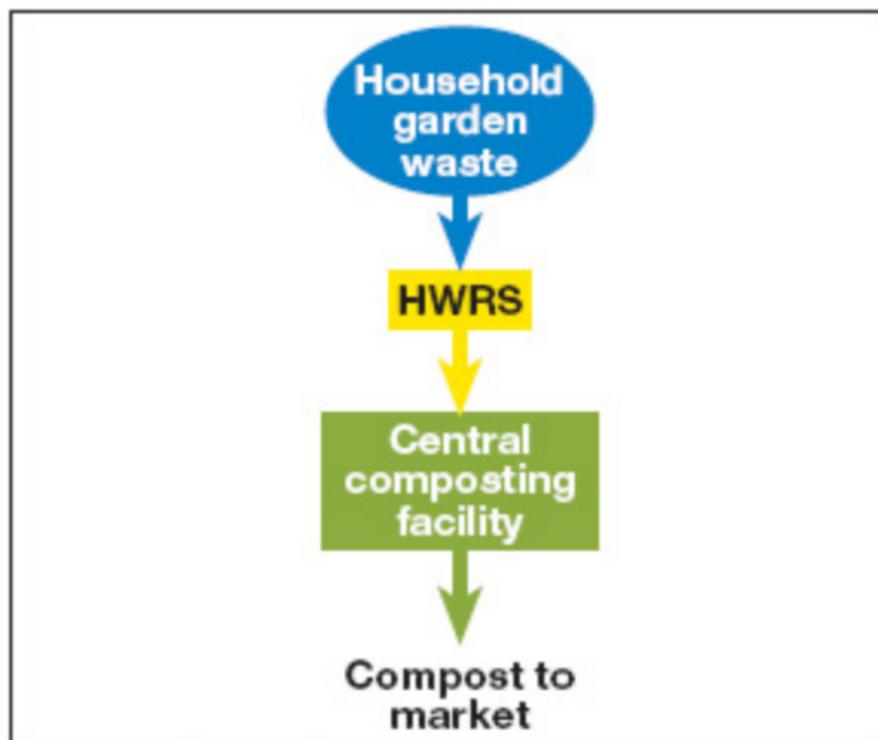


Figure 6.2: Waste composting process

7.0 WASTE RECOVERY

- 7.1 Waste recovery forms the central element in the Strategy's aims of minimising the volume of waste going to landfill. Initially, recovery would take place through the existing RDF plant at Pebsham. However, under Onyx's Strategy, in 2008 the 225,000 tonnes per annum EfW facility would be operating at Newhaven, greatly increasing the proportion of the waste resource that is 'recovered' for beneficial use. At this point, waste recovery would primarily consist of energy recovery (approximately 20 MW) and the associated beneficial reuse of ash from the recovery process.
- 7.2 Onyx has one operational EfW facility (SELCHP, London) and three under construction (Chineham, Marchwood and Portsmouth). The combined waste throughput is 840,000 tonnes per annum.
- 7.3 Onyx proposes to locate a new technology facility (probably anaerobic digestion) at Pebsham in place of the existing RDF plant. This would be operational by 2012 and is proposed to have an annual capacity of 75,000 tonnes. The new technology recovery would consist of energy recovery together with the associated generation of digestate material, which may be sold to local markets as compost / soil conditioner product.
- 7.4 In 2005, total waste recovery would account for approximately 108,000 tonnes of waste arisings. But this is proposed to increase to approximately 277,000 in 2010 and approximately 320,000 in 2015. Figure 7.1 illustrates the waste recovery process.

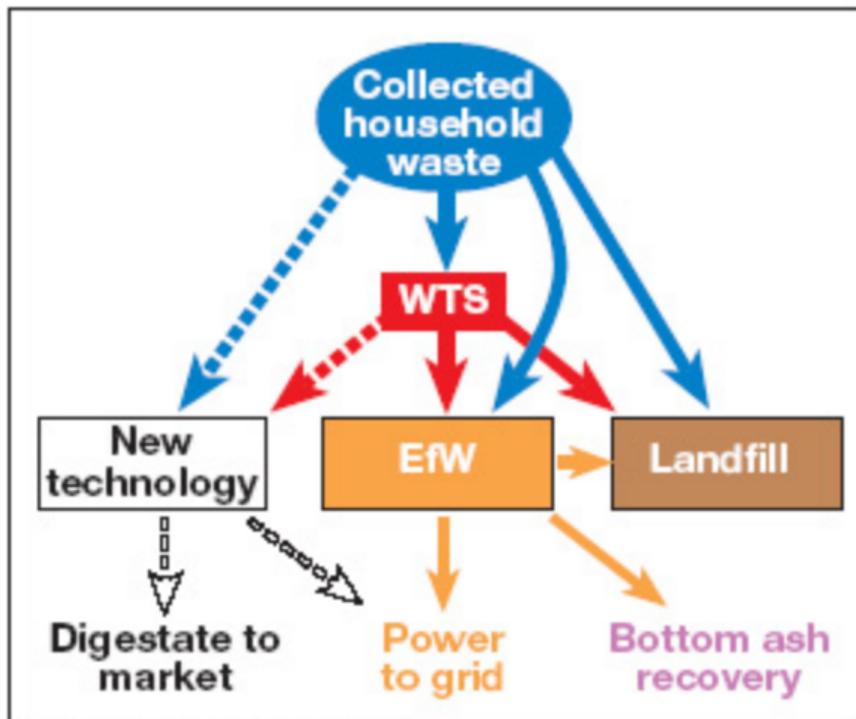


Figure 7.1: Waste recovery process

8.0 ENERGY FROM WASTE

- 8.1 The inclusion of EfW in the strategy as one of the main recovery components is in accordance with current policy guidelines and legislative requirements, most of which was summarised in section 2 of this document. Key pieces of legislation include the EU Landfill Directive and the Incineration Directive, Waste Strategy 2000, PPG10 (Planning and Waste Management) and the first deposit draft of the East Sussex and Brighton & Hove Waste Local Plan.
- 8.2 However, site-specific guidance in relation to EfW is also available and has been central in siting of the proposed EfW facility. These are summarised below:

PPG10 (Planning and Waste Management)

- 8.3 This planning policy guidance note provides guidance both at a strategic level (which was used in the development of the overall Strategy) and also gives general site-specific guidance. The key form of this guidance is the proximity principle, which aims to minimise transportation impacts by siting waste facilities close to the centres of waste arisings.

PPG7 (Countryside)

- 8.4 This PPG is of relevance because much of East Sussex and Brighton & Hove is designated as Areas of Outstanding Natural Beauty (AONB). This designation places restrictions on development within an AONB, and also provides ‘tests’ that a proposal must pass in order to be permitted within an AONB.

East Sussex and Brighton & Hove Waste Local Plan first deposit draft

- 8.5 The waste local plan provides both strategic guidance and site-specific allocations for EfW. Policy WLP9, site-specific allocations for EfW and MRFs, notes that:

“Proposals for energy from waste with material recovery facilities will be supported on suitable land within the following areas of search:

- *North Quay, Newhaven*
- *Mountfield Mine, Robertsbridge”*

- 8.6 In July 2001 the Director of Transport & Environment for East Sussex County Council and the Strategic Director for Environment & Housing for Brighton & Hove City Council published a Joint Technical Report titled “Main issues arising from the first deposit waste local plan consultation”.

- 8.7 This technical report contains a number of recommendations, three of which are relevant to EfW. Recommendation 4(a) seeks to:

“Confirm the need for the Plan’s strategy to include the recovery of energy by Energy from Waste (EfW) treatments, including the option of incineration with energy recovery”

- 8.8 Recommendation 6(a) seeks to:

“Allocate Pebsham as an area of search for a combined Energy from Waste (EfW) plant and Materials Recovery Facility (MRF) in the Second Deposit Draft of the Waste Local Plan and delete Mountfield for EfW/MRF”

- 8.9 Recommendation 8(b) seeks to:

“Confirm that North Quay, Newhaven remains the preferred site for an Energy from Waste (EfW) plant and Materials Recovery Facility (MRF) to serve the western part of the Plan area and to agree that, upon completion of the consultants ‘economic impact study’ (recommendation 8a), the Councils should consider the acceptability of allocating a site for waste water treatment works at Newhaven, in addition to an EfW/MRF plant”

- 8.10 After extensive consideration of both options in the first deposit draft of the waste local plan, Onyx believes that Newhaven is the optimum site for EfW and preferable to Mountfield Mine.

- 8.11 Onyx concurs with the conclusions of the technical report with respect to Mountfield Mine and considers that the development of a 225,000 tonnes per annum EfW facility at Newhaven represents the best option. Onyx does not foresee the short-term necessity of a further EfW facility at Pebsham but acknowledges that the site may be required in the medium to long-term. Onyx proposes a new technology facility at Pebsham (anaerobic digestion or similar) to complement existing waste management facilities from approximately 2013 onwards. A brief site-by-site assessment of the three key sites relevant to the EfW facility is set out below:

North Quay, Newhaven

- 8.12 North Quay, Newhaven is the preferred site for the proposed EfW plant. The site is identified in the first deposit draft of the WLP (November 2000) and the Joint Technical Report (July 2001) as being the “preferred site” for EfW.
- 8.13 This brownfield site is part disused and part heavy industrial site, including inert waste recycling and scrap metal uses, making it a suitable site in principle for EfW development.

- 8.14 Whilst Newhaven is outside of the AONB, views of the site can be obtained from the AONB, in particular along the valley of the River Ouse. Considerations of visual and landscape character impacts are important aspects of any submission and Onyx is already considering this issue as part of its preliminary design proposals.
- 8.15 The site is only approximately 14 kms from Brighton & Hove, the main centre of waste arisings in the Plan area. This area generates approximately 160,000 tonnes of municipal waste per annum. An alternative sites assessment undertaken by the East Sussex and Brighton & Hove Councils did not identify an alternative acceptable site for EfW within the built-up area of Brighton & Hove. Locating such a plant on the urban edge of Brighton & Hove is likely to be precluded due to the impact on the AONB. Newhaven is the closest acceptable site to the main centres of waste arisings and is therefore in accordance with the proximity principle.
- 8.16 Notwithstanding the above, Onyx would undertake a rigorous alternative sites assessment as part of the post-Best And Final Offer (BAFO) process. This assessment would seek to demonstrate and verify that the conclusions reached (Newhaven being the optimum site) are correct and that a robust and comprehensive alternative sites methodology has been used.
- 8.17 Access to the site is adequate but could be improved. There are a number of improvement options available, including making significant improvements to the existing access road. Another option is the construction of a new flyover from the A26 over the railway line to the northern part of the North Quay site.

Mountfield Mine

- 8.18 Onyx is of the opinion that Mountfield is unsuitable for an EfW site. It is located over 26 kms from Brighton & Hove, the main centre of waste generation in the Plan area. Mountfield is therefore almost double the distance from the main waste arisings in comparison to Newhaven. Not only would this place Mountfield Mine in conflict with the proximity principle of PPG10, but also would lead to unnecessary adverse environmental impacts arising from the increased waste transportation distance.
- 8.19 This site is located within the High Weald AONB. PPG7 (Countryside) sets out the Government's policy on development in such areas. It is Government policy in PPG7 not to permit major projects within the AONB unless there are exceptional circumstances and where such proposals would be in the public interest. In the first deposit draft of the WLP, Policy WLP3 (AONB and National Park) effectively mirrors PPG7's policy on development in AONBs.

- 8.20 There are three ‘tests’ in PPG7 that proposals must pass in order to be granted planning permission within an AONB. These tests are also found in WLP3. These are:
- Need to be in the national interest
 - No acceptable alternative site
 - Enhancement of the landscape character of the AONB arising from the development proposal
- 8.21 Mountfield Mine fails all three of these tests. Onyx does not believe that the EfW proposals could be considered to be in the national interest. In reaching this decision, we have paid careful attention to the Secretary of State’s decisions at Copyhold (EfW proposal in Surrey) and Portobello (wastewater treatment works proposals in East Sussex).
- 8.22 The Portobello decision is of particular relevance to Mountfield as the refusal of planning permission for a WWTW was based on the potential for the damaging effect on the Sussex Downs AONB and the realistic availability of alternative sites outside the AONB, principally at Newhaven.
- 8.23 In the WLP, Newhaven represents a potential EfW site outside the AONB. This precludes development at Mountfield as there is an alternative site available. In the Joint Technical Report, Pebsham, also outside the AONB, is recommended for inclusion in the second draft of the WLP in place of Mountfield Mine.
- 8.24 Regarding enhancement of the AONB, any landscape and visual mitigation would be unlikely to actually improve the character of the AONB. Rather, such mitigation measures would be designed to offset the harm caused by the EfW plant.
- 8.25 There are other issues relating to Mountfield that reduce its attractiveness for EfW development. For example, it has previously been used as a gypsum mine. Quarrying activities may have resulted in significant geotechnical problems, such as localised faulting, subsidence, undiscovered underground mines or localised rock weaknesses. The geology of the Mountfield site therefore may not provide the level of stability necessary for the foundations of an EfW plant. Mitigation measures could overcome these potential limitations, although they can be costly. The site is also surrounded by ancient woodlands and is located in a rural area.
- 8.26 Based on these reasons, Onyx is of the opinion that Mountfield Mine is an unsuitable site for an EfW plant and does not propose to locate any facilities at this location.

Pebsham WDF site

- 8.27 The Joint Technical Report recommends that Mountfield be deleted from the first deposit draft of the WLP and replaced by Pebsham in the second deposit draft.
- 8.28 Currently Pebsham contains a Waste Derived Fuel (WDF) plant. East of the site is the active Pebsham landfill site which has a projected life until approximately 2005.
- 8.29 In terms of the proximity principle in PPG10, Pebsham offers significantly greater benefits in comparison to Mountfield Mine, although Newhaven remains the optimum site. Pebsham has the ability to treat waste arisings from the eastern part of the Plan area, although the majority of waste will be generated in the western part (Brighton & Hove).
- 8.30 Pebsham is also outside the AONB. The site contains an existing waste facility (WDF plant) and has a history of waste-related uses. Any proposed facility is unlikely to have a significant visual impact, due to the site's history and the nature of its surroundings, compared to the potential visual impact at Mountfield Mine.
- 8.31 Access to Pebsham is difficult and prone to congestion as the access road carries traffic for both the WDF plant and the 450,000+ tonnes per year landfill site. In 2005, however, landfill operations are due to be completed, effectively removing this proportion of traffic from the local road network.
- 8.32 Onyx proposes to locate a new technology plant, possibly anaerobic digestion, at Pebsham in 2012. This plant would have a maximum capacity of 75,000 tonnes per year and would treat waste arisings in the eastern catchment area. In 2005, traffic associated with landfill operations will have ceased, freeing up capacity for the traffic likely to be associated with the new technology facility in 2012.
- 8.33 Onyx agrees with the recommendations in the Joint Technical Report that seek to replace Mountfield Mine with Pebsham as an alternative site for EfW/MRF. However, Onyx proposes to use an alternative 'new technology' form of waste treatment.

9.0 PLANNING PERMISSION AND ENVIRONMENTAL IMPACT ASSESSMENT

Planning permission

- 9.1 Planning permission is required if a project constitutes "development" by virtue of a change in the use of land, carrying out construction or carrying out an engineering operation to change the physical form of land.
- 9.2 Certain types of development are granted planning permission automatically under the Town and Country Planning (General Permitted Development) Order 1995. The range of permitted development is generally greater for public sector or public service activities.
- 9.3 Waste Contractors and Waste Disposal Authorities, however, have no permitted development rights. Also, the proposed new buildings would be too large to qualify as permitted development under the regulations relating to existing industrial buildings.
- 9.4 Therefore express planning permission will be required for the new buildings and structures and planning applications will be required.

Environmental impact assessment

- 9.5 Environmental impact assessment (EIA) is *"a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects"* [DETR Circular 2/01].
- 9.6 For certain types of development project with the potential to have significant effects on the environment, planning regulations require that EIA be undertaken and the results reported in an environmental statement (ES) to accompany the planning application.
- 9.7 The Town and Country Planning (Environmental Impact Assessment Regulations) (England and Wales) Regulations 1999, set out the types of project for which EIA is required. For Schedule 1 development, EIA is mandatory. Schedule 2 development may require EIA, depending on the size and scale of the proposals and the 'receiving environment'. While the need for EIA is often uncertain, it is likely that EIA will be required for all EfW proposals. The EfW facility is likely to be considered as a new *"installation for the incineration... .. of non hazardous waste with a capacity exceeding 100 tonnes per day* (EIA Regs 1999, Schedule 1, para 10), which is classed as a Schedule 1 development.
- 9.8 In cases where there is doubt about whether EIA is necessary, proceeding without EIA may be more likely to cause delay and uncertainty. Delays can be created by having to provide information to the Local Planning Authority or key consultees

(such as the Environment Agency) following submission of an application without EIA. In addition, consultees are more likely to criticise the application if there is doubt as to whether EIA is necessary and if an assessment has not been undertaken.

- 9.9 The regulations allow for a "Screening" process to be undertaken by a Local Planning Authority (LPA) at the request of the applicant to determine whether EIA of a particular scheme is necessary. This procedure is useful in some cases to confirm that EIA is not necessary and in others to provide justification as to why it is in fact necessary.
- 9.10 Scoping is the first stage of EIA. It establishes the range of subjects to be reported on in the ES and the degree of depth with which they will be examined. A preliminary scope of potential issues is provided later in this document.
- 9.11 Scoping is not a formal requirement of EIA. However, the greater the degree of agreement between an applicant and the LPA before an EIA application is submitted, the lesser the risk of delay caused by 'late' matters emerging.
- 9.12 In order to reduce this risk, an applicant may apply for a Scoping Opinion from the LPA, which should be given within five weeks of a request. In order to assist this process, a draft scoping document would be prepared to establish the issues that should be considered in the ES. The applicant would then circulate this document to the Statutory Consultees and any other significant bodies who would be consulted on the planning application. These bodies would be invited to send their comments directly to the LPA who would then produce its opinion.
- 9.13 The regulations place no requirement on a LPA to stand by its scoping opinion, as proposals will inevitably evolve and impacts change following consideration of initial preliminary proposals. However, in gaining an opinion, the applicant has the opportunity to engage fully in discussions with a range of consultees and with the LPA. This activity reduces substantially the risk of late matters emerging and enables the carrying out of the EIA to be done relatively quickly and efficiently.
- 9.14 A fully consultative scoping exercise would be undertaken, including a scoping opinion from the LPA before finalising the content of the ES. The scoping exercise therefore is likely to minimise delay and uncertainty whilst the LPA is determining the planning application.

The environmental statement

- 9.15 The ES would be prepared in accordance with the EIA Regulations, the advice contained in DETR Planning Circular 2/91 "*Environmental Impact Assessment*" and best practice. It would report on the outcome of the EIA process.

9.16 Following scoping, the EIA would consist of four distinct activities:

- baseline information gathering
- prediction of environmental effects
- identification of measures to mitigate effects
- confirmation of "residual" effects.

9.17 Baseline information gathering is one of the key activities. Information would be collected from existing published sources (e.g. the records of the plant's existing emissions), from surveys carried out on site and in the area, from discussions with relevant bodies and from comparable plants located elsewhere.

9.18 Discussion with relevant "technical" consultees (e.g. relevant Council departments, English Nature, Environment Agency etc) would be a significant feature of the work. These discussions would be used to gain information, seek views and gain consensus on conclusions.

Planning application procedures

9.19 Planning applications would be submitted to East Sussex County Council Planning Department, which is the LPA, who will consult a wide range of organisations on the application. These organisations will comprise statutory and non-statutory consultees, each of which will be invited to make its comments before a specified date.

9.20 The application will also be advertised and the views of members of the public and other interested parties will be sought by the LPA.

9.21 Once sufficient information becomes available, including information from consultees, the LPA officers will make a recommendation as to whether planning permission should be granted. This recommendation will be made to the relevant elected Members of the Council (usually the Planning Committee or in some cases to Full Council) who will make the decision as to whether planning permission should be granted.

9.22 Where an application is classed as a departure from the development plan, the LPA may need in certain circumstances, to refer the application to the Secretary of State if the LPA was minded to approve the application. The Secretary of State (SoS) would then have to decide whether the application should be called in for his or her determination. If the application were called in, the SoS would hold a public inquiry prior to determining the application.

10.0 PRELIMINARY SCOPING OF SITE-SPECIFIC ISSUES

- 10.1 Scoping is a vital part of the Environmental Impact Assessment (EIA) process. It allows the key environmental issues to be identified and assessed to a suitable level of detail. A brief preliminary scoping note for all of the sites is set out below. This has been included for information only and a formal scoping process would be undertaken, if the development were deemed to require an EIA.
- 10.2 While not all of the proposed facilities will require an EIA, a scoping note for all of the sites has been provided. Where EIA may be required, a brief screening note will be included outlining the reasons for this.

11.0 ENERGY FROM WASTE- NORTH QUAY, NEWHAVEN

Proposals

- 11.1 Onyx proposes to construct a 225,000 tonnes per annum EfW facility at North Quay, Newhaven. The facility is proposed to be operational by 2007. The design is based on approximately 28 tonnes per hour throughput for 24 hours per day, seven days a week. However, periodic shutdowns for maintenance and repair have been taken into account.
- 11.2 The facility will incorporate recovery of ferrous metals from bottom ash. Processing of bottom ash for reuse as aggregates and non-ferrous metals will be undertaken when this proves commercially viable.
- 11.3 The facility will have a gross electricity output of 20MW. Of this, approximately 4MW will be used by the facility, leaving 16 MW available for export to the grid. This is enough power to serve 14,000 homes. Figure 11.1 shows a potential site layout plan. The proposals for Newhaven are classed as being EIA development under Schedule 1 of the Regulations.

Site description

- 11.4 North Quay is located on the eastern bank of the River Ouse in Newhaven, north of the A259 bridge. The site is located on a narrow strip of flat ground immediately between the river and the railway. The site measures 100 meters at its most broad and 40 metres at its most narrow points. It extends some 1,800 meters northward. The northern boundary is defined by the former meander of the River Ouse, now separated from the main river body by the levee constructed to canalise the river. The southern part of the site is occupied by various port related activities, including an aggregate depot, scrap metal yard and various storage facilities.

Environmental Issues

Landscape

- 11.5 Newhaven is outside the AONB. Due to its proximity (to the north of the site), however, landscape is an issue of primary importance. The proposals could possibly be seen as an extension of the built form of the port into the adjacent countryside. Consideration must be given to views along the Ouse valley.
- 11.6 Onyx recognises the importance of landscape issues and is developing a form of development that is visually attractive with an intention of minimising adverse visual effects. Extensive architectural work has already been undertaken. An artist's impression of the EfW facility is shown in figure 11.2. To show how the Onyx design differs from a so-called 'box' or standard EfW design, an artist's

impression of a standard EfW design is also provided in figure 11.3. Figure 11.4 is a photograph of the existing site.

Air quality

- 11.7 Air quality is likely to be a primary issue. The facility would be designed to meet the stringent emission standards of the EC Waste Incineration Directive (2000/76/EC). Public concerns regarding emissions from EfW facilities have been the subject of much debate and attention. Recent planning decisions (Copyhold, Portsmouth, Slyfield, Clockhouse), however, have ruled that air quality concerns are not grounds for refusal per se as pollution control technology is capable of addressing any toxic emissions from the stack.
- 11.8 The flue gas cleaning system is of the 'dry' type and will use hydrated lime, activated carbon and urea as the reagents. Reaction products and fly ash will be collected in powder form at the bottom of the bag house filter.
- 11.9 Onyx would however still undertake a comprehensive air quality monitoring programme to determine the air quality baseline in Newhaven, which would be used in the assessment of potential EfW impact on local air quality and local amenity issues.

Noise

- 11.10 The EfW facility would operate 24 hours/day, seven days a week (apart from periodic shut downs for maintenance). This may result in noise effects, especially at night when the baseline noise levels are lower. Thus, noise has been classified as a potential primary issue.
- 11.11 However, noise abatement and mitigation techniques are available and would be incorporated into the design and construction of the facility. Also, the baseline noise levels do not appear to be low, given the proximity of a railway line, the A26, scrap metal recycling activities, nearby port activities and aggregate processing.

Water

- 11.12 Water is potentially the most significant on-site issue. As the Newhaven site shows evidence of previous flooding, engineering techniques and flood defence structures would be necessary in site preparations and construction.
- 11.13 The EfW process results in aquatic emissions, which would be routed to a waste water treatment plant. Where possible, waste waters would be recycled back into the EfW process.

- 11.14 The proximity of the River Ouse is a significant issue. Best practice construction techniques would be used to prevent contaminated runoff entering the river system. Temporary balancing and storage ponds would be created, which would also act as emergency reservoirs. All hydrocarbons would be stored in fully bunded areas with suitable protection provided.
- 11.15 In all cases the Environment Agency would be consulted on the above issues and their approval sought for the final proposals.

Traffic and access

- 11.16 Onyx has undertaken a preliminary investigation of a number of proposals to improve access to the Newhaven site. One option is to improve the existing site access, an eastbound slip road below the A259. This road is in a state of disrepair and should be significantly improved. Another option is to construct a flyover off the A26. This would go over the railway line and enter the site at the northern end. Traffic consultants have already been instructed to assess the feasibility of all available options. Onyx is willing to enter into Section 106 Legal Agreements to ensure that appropriate and acceptable improvements are provided as part of its proposals.
- 11.17 Preliminary analysis of the traffic created by the proposals indicates that approximately 26 two-way trips per hour would be generated, most of which would occur outside peak traffic flows. This is considered to have little impact on the existing highway capacity.
- 11.18 Access to the site is adequate, but Onyx will undertake to make improvements, where required. Investigations to the site access are underway and the results will be incorporated into the final proposals for the site.

Soils and contamination

- 11.19 An initial geological assessment was undertaken using the British Geological Society solid and drift geological map. Previously drilled boreholes close to the site indicate that the underlying geology consists of 1.5m of made ground (man-made) followed by approximately 28.5m of alluvial deposits. Below this the Cretaceous Chalk was encountered, 30m below ground level.
- 11.20 Based on the above, the Environment Agency have published Groundwater Vulnerability Maps. This shows that the underlying Chalk aquifer (water-bearing rocks from which water is obtained) is classed being of major importance. However, the immediate geology is the alluvium, which is a minor-aquifer. The risk to groundwater contamination has been classed provisionally as low risk.
- 11.21 Given the site's past industrial and waste uses, the potential for soil contamination is high. An examination of the sites history and Environment Agency indicate that

the site has been contaminated from past industrial use. In particular, contamination by creosotes (highly contaminative substance derived from coal tars) is likely to be heavy. However, the Environment Agency also noted that the site was not considered to be an immediate risk to groundwater and that the site could be put to industrial use, based on further site investigation and completion of a suitable remediation programme.

- 11.22 The presence of the nearby River Ouse increases the significance of this issue. Therefore major earth and engineering works are likely to be required to prepare the site. This may result in the mobilisation of pollutants.
- 11.23 A detailed examination into the scale and extent of soil contamination would be undertaken prior to construction. Any soils deemed to be contaminated would be removed and disposed of in a suitable and licensed landfill.

Ecology

- 11.24 As there is little in the way of ecological interest on the site, ecology is classed as a secondary issue. However a Phase 1 ecological survey will be undertaken and, where necessary, a more detailed Phase 2 survey to establish the importance of any ecology encountered. Notwithstanding the limited ecology on site, the EIA would also assess whether there would be any impacts on ecology elsewhere in the locality.

Cultural heritage

- 11.25 Given the previous industrial use of the site, it is unlikely that the potential for archaeological findings are great. However, all relevant archaeological lists and designations would be consulted and, if required, an assessment would be undertaken.

Social and community

- 11.26 The scoping of the social and community effects of the proposals would examine issues such as employment and economic and social impacts on the community.

Land use

- 11.27 The land use implication would be examined in the EIA process. Key factors include existing planning and WLP policy, immediate land uses, past uses of the site and nearby receptors.



DO NOT SCALE



Location Plan



Figure Number 11.1: Energy from Waste Facility, North Quay, Newhaven



Figure 11.2: Artist's impression of the proposed ETW facility. View looking north towards North Quay.



Figure 11.3: Artist's impression of a 'standard' or 'box' EIW design. Note how the Onyx design (figure 11.2) is less visually intrusive in comparison to the above design



Figure 11.4: Photo of North Quay, Newhaven (looking west)

12.0 WASTE TRANSFER STATION- MARESFIELD CAMP, UCKFIELD

Proposals

- 12.1 Onyx proposes to site a waste transfer station serving the northern section of the Plan area. Maresfield Camp, Uckfield is currently the preferred site for this facility. This waste would be transported in from the network of household waste recycling sites. The waste transfer station would have an annual capacity of 40,000 tonnes and would be operational by 2005. Onyx proposes to develop a new household waste recycling centre (or civic amenity site) on the same site. Note that there is no building footprint plan available for this site. This will be finalised when further design studies are completed.

Site description

- 12.2 Maresfield Camp is adjacent to the southwestern edge of Maresfield, a small village approximately 2 km north of Uckfield. The site is physically separated from the settlement by the A22.
- 12.3 It is a brownfield site with a total area of over 16 hectares in size, although the section proposed for Onyx's waste facilities would involve only approximately 1 hectare of this area. The site was formerly a military camp and still contains a disused rifle range. An extensive area of hardstanding is evident around the southern perimeter of the site. The majority of the site is covered in vegetation of limited ecological value. The surface soil consists of made-ground. Areas of the site are littered with flytipping, especially the entrance off of the A272.

Surrounding land uses

- 12.4 There is an active fire brigade training centre immediately southwest of the site. There are frequent fire training exercises involving fire drills and extinguishing substantial, but controlled, fires. During a site visit, smouldering ruins, debris and smoke columns were seen.
- 12.5 Southeast of the site is a derelict and cleared hardstanding area, probably related to the former military use of the site. Minor flytipping was also evident, as were various piles of aggregates and other construction materials.
- 12.6 Maresfield Military Camp was once adjacent to the eastern edge of the proposed site. There is a rifle range to the north and sewage works to the south. The remaining land is in agricultural or forestry use. The A22 forms the eastern boundary of the site and the A272 the western boundary. Beyond the immediate vicinity of the site are a number of woodlands and agricultural holdings.

Environmental issues

Landscape

12.7 Landscape implications are the key environmental issues. However, these can be addressed through careful siting of the facility, high quality design, and adequate screening and landscaping. The site is not within the Sussex Downs Area of Outstanding Natural Beauty (AONB). A site visit confirmed the existence of tall and dense screening vegetation along the roadsides of the A22 and the A272. Careful construction and siting could ensure that most of this vegetation remains in place, providing sufficient mitigation against potential landscape issues.

Traffic and access

12.8 The A22/A272 junction provides good access to the site and ensures that the waste transfer station is located on the strategic county transport network. Existing access is provided off the A272, which is not as heavily trafficked as the A22, allowing easier and safer site access. Both roads are A-class main roads.

Ecology and soils

12.9 The majority of the site consists of made-ground and the vegetation, although extensive, appears to be of limited ecological value.

Archaeology

12.10 The former route of a Roman road passes through the western edge of the site, just west of the fire brigade training centre. Development of the proposals on the former Camp area should not affect the Roman road.

Noise

12.11 While waste transfer stations generate moderate noise levels, the baseline noise level at the site is relatively high and is typical of a trafficked road. All waste activities will be enclosed, reducing the noise impact. It is therefore not considered that noise would be a significant issue.

Land use

12.12 The proposed waste transfer station is compatible with the surrounding land uses and the past history of the site as generally, waste transfer stations should be sited on industrial land and/or brownfield sites.

12.13 The nearest residential receptors are approximately 200 metres (and separated by the A22 and A272) from the site to minimise any potential nuisance caused by noise and traffic flows.

Planning issues

- 12.14 Maresfield Camp is identified in the Wealden Local Plan adopted version (December 1998) as a site for a Business Park. Policy BS10 promotes the site for this business use.
- 12.15 This site is not allocated in the first deposit draft of the East Sussex and Brighton & Hove Waste Local Plan for any waste-related uses. However, a nearby site (Millpond Depot, also in Maresfield) has been allocated in policy WLP8 as a site for materials recovery facilities/waste transfer facilities. This is a strategic site-specific allocation to provide waste facilities in the northern part of the Plan area.
- 12.16 However in the Joint Technical report, recommendation 9(a) seeks to allocate Maresfield Camp as an alternative site to Millpond Depot for a materials recovery facility/waste transfer station to serve the North Wealden area. Onyx supports this recommendation and considers that Maresfield Camp is the preferred site to Millpond Depot.
- 12.17 The current owners of the site are East Sussex County Council and Wealden District Council.
- 12.18 The proposed waste transfer station at Maresfield Camp is not thought to be EIA development. It will however, require planning permission and a waste management licence.



Figure 12.1: Photo of Maresfield Camp, Uckfield (looking south)

13.0 COMBINED MATERIALS RECOVERY FACILITY & WASTE TRANSFER STATION- HOLLINGDEAN DEPOT, BRIGHTON

Proposals

- 13.1 It is proposed that a MRF and a waste transfer station serving the western section of the Plan area, be sited at the Hollingdean Depot in Brighton. Both the waste transfer station and the MRF would have a maximum eventual throughput of around 100,000 tonnes per annum. The waste transfer station would only handle waste arising from Brighton & Hove City Council. Onyx proposes that both facilities would be located in the northern part of the site and be operational by 2004.
- 13.2 There are two alternative locations for this site: a northern and southern option. At this stage in the BAFO process, the optimum site has not been finalised. Studies and investigations are currently being undertaken to assess both options. For completeness, both sites at Hollingdean will be examined here. Potential building footprints have been provided for both site options (A and B). Figures 13.1 and 13.2 illustrate both potential options for Hollingdean. Figure 13.3 is a photograph of the site and its surroundings.

Site description

- 13.3 The overall site is centrally located within the Brighton & Hove conurbation and can be divided into two main parts as Hollingdean Lane bisects the site into a northern and southern part.
- 13.4 The northern part of the site (Option A) can be subdivided into three main areas. The largest of these is Brighton & Hove's storage depot, which is occupied by the Corporation's waste contractors. The depot generates a significant amount of HGV movements. Access is off Upper Hollingdean Road.
- 13.5 East of this area is a wholesale meat market, also a generator of significant levels of HGV traffic. The southern entrance to the meat market (off Hollingdean Lane) is littered significantly with waste and flytippings. Visually, the area has an open perspective with surrounding residential areas overlooking the site. A car park occupies the majority of the market area.
- 13.6 The smallest area of the northern part of Hollingdean Depot is a small lorry park, which appeared to be used for storage at the time of a site visit and contained a number of temporary storage sheds. There were also some construction materials and minor flytippings.
- 13.7 The southern area of the site (Option B) was also sub-divided into three main areas. The smallest area on the northern perimeter of the site contains a one-storey, red-brick disused cleansing centre.

- 13.8 An exhibition lorry park (also used as a temporary car park), which is generally an open hardstanding area, comprises approximately 40% of the southern site. The eastern area of the lorry park is heavily littered with flytippings and other industrial waste. A small part of this area is used for temporary storage. In general, this area appears to have little current industrial use.
- 13.9 Thirdly, there is a former abattoir, some small meat operators and a double-glazing workshop. This area covers over 45% of the sites area. It is not as open as the lorry park and has a stronger manufacturing and industrial presence. Access to all three areas on the southern part of Hollingdean Depot is off Hollingdean Lane.
- 13.10 Overall the whole site has a sloping topography from west to east, which has considerable landscape implications. Generally, both parts of the site have a strong industrial appearance and many of the buildings appear to be poorly maintained.

Surrounding uses

- 13.11 Housing is the dominant surrounding land use in a sector ranging from the west to the northeast. Two occupied Council tower blocks, immediately west of the site, have a prominent view of the Hollingdean Depot site. To the north are extensive residential areas but the Upper Hollingdean Road physically separates these from the site. However, they do still have unobstructed views of the site, especially the northern part.
- 13.12 To the south and southeast of the site are more residential areas and the Centenary Industrial Estate, although a railway line bounded by extensive banks of mature vegetation separates and screens these areas from the Depot.
- 13.13 Immediately west of the southern part is a Jewish burial ground, a chapel and the Downs County Infant School. Again, mature vegetation and tree screening places a physical barrier between these land uses and the site. Hollingdean Lane (which runs east-west and bisects the site) turns south and passes between these western land uses and the site.
- 13.14 There are two small bungalows at the point where Hollingdean Lane turns south.

Environmental issues

Landscape

- 13.15 The site is not within the Sussex Downs AONB. However, the varying topography of the site and the surrounding areas makes views into and out of the Depot an important consideration. A number of the surrounding residential areas will have views of the site. Those with the most prominent views are the Council

tower blocks to the west and the houses north of Upper Hollingdean Road. Suitable landscaping and sympathetic screening along the perimeter of the site may reduce these views. Housing all of the facilities internally may further reduce the visual effects of the proposed facilities.

- 13.16 There is, however, the potential to improve on the existing visual characteristics of the Hollingdean Depot. The existing site has the appearance of a well-used industrial site with poor boundary screening, flytipping and a number of poorly maintained and derelict industrial units. The Onyx facilities could significantly improve on this visual appearance.

Traffic and access

- 13.17 Traffic is an important issue for such a central location, although the existing uses already attract a high proportion of HGVs. The net effect of HGV generation will depend on which of the existing uses are replaced by the waste transfer station. Local regulations concerning lorry routing require the site to be accessed via the A270 Vogue Gyratory and under the railway bridge (which has a 4.6m height restriction) directly east of the site.
- 13.18 A site visit confirmed the extent of the traffic problems from access under the railway bridge. Access to the northern part of the Depot off Upper Hollingdean Road is also problematic as the road has a steep gradient, is heavily trafficked and has two separate entrances. Hollingdean Lane, which provides access to the southern part of the Depot, is very narrow and is only wide enough for one HGV at a time.
- 13.19 Onyx proposes to address existing traffic and access issues through implementing a one-way flow system whereby arriving HGVs would enter the site at one entrance, deposit their waste loads and/or collect waste loads to transport to a treatment facility, and leave via a separate exit. This system would ensure less congestion and allow efficient and safe movement of traffic in and around the site area. Onyx also proposes to improve access to Hollingdean Depot by implementing improvements to the road layout under the railway bridge. Onyx would be prepared to enter into a Section 106 legal agreement to secure any necessary and appropriate highway improvements associated with its proposals.

Ecology and soils

- 13.20 The site consists of hardstanding, with minor intrusions by weed species. Some of the site boundaries were lined by common tree species. Overall, the site has little in the way of ecological value.

Groundwater

13.21 The Environment Agency notes that the site is within a Special Protection Zone 1 (Patcham). These are zones that restrict the types of development and activities permitted within their boundaries in order to protect drinking water supplies from pollution. Any waste-related development must ensure that adequate groundwater protection measures are incorporated to prevent groundwater pollution. The previous industrial uses of the site may warrant a detailed contaminated land investigation.

Noise

13.22 The proximity of residential dwellings to the development site makes noise an important consideration. However, the ambient noise levels are relatively high and are typical of a heavily trafficked road network. The industrial nature of the Depot adds to the ambient noise levels. To minimise any additional noise and disturbance transmitted to nearby residents, the facilities would be enclosed, soundproofed and insulated.

13.23 The southern location option for the proposals offers a marginally improved noise environment, as the vegetation screening, increased distance from the northern residential receptors and increased distance from Upper Hollingdean Road all may reduce the noise from the proposals. Rail-related noise will increase the existing ambient levels at the southern section.

Air quality

13.24 An Air Quality Management Area has not been declared in the Brighton area, indicating that the city has no air quality issues of a serious nature. Although the existing high volume of HGV traffic may result in relatively high local NO₂ and PM₁₀ ambient concentrations. The change in traffic flows, and local air quality, from the Onyx proposals will depend on which of the existing land uses are transferred from Hollingdean. Data from the National Air Quality Database on future pollutant concentration levels in Brighton indicates that the air quality standards for nitrogen dioxide may easily be met, but that the particulates standard may be exceeded. However, it must be noted that a coastal location, such as Brighton, can be expected to have higher than normal particulate concentrations due to the proximity of suspended particulates, especially salts, from the sea.

Land use

13.25 The proposed facilities are compatible with the current and previous industrial nature of the Hollingdean Depot. The site has had a long history and association with waste management, dating back as far as the early nineteenth century. The northern part of the site currently is used as a refuse truck depot for the Council's

waste contractor. Existing on-site activities create a traffic, noise and visual impact of similar nature as the proposed MRF and waste transfer station.

- 13.26 Careful design, site layouts, external architectural treatment, screening and landscaping would minimise the potential effects that may arise from the proposals. All activities would be housed internally, further reducing potential effects.

Planning issues

- 13.27 Part of the site is allocated in the adopted Brighton Borough Local Plan (1995) for B2 industrial use.
- 13.28 However, the Brighton & Hove Local Plan Deposit Draft (2000) recognises the site's allocation in the first deposit draft of the WLP as a site for a MRF or a waste transfer station (Policy WLP 8) and supports "proposals for a materials recovery facility / waste transfer". Onyx agrees with both of the plan allocations and intends to site a combined MRF and waste transfer station at this location.
- 13.29 The proposals fall under Schedule 2 of the EIA Regulations. In the main Regulations they are likely to exceed the 'exclusive threshold' for its project type, as the proposals are likely to exceed 0.5 hectares. It should be noted that the site may be within 100 metres of a controlled water (another threshold in the Regulations) as the site is within SPZ1 (Patcham). This will need further investigation.
- 13.30 The proposals are listed under Annex A of the Guidance Circular 02/99 for the Regulations as A36, 'Installations from the disposal of non-hazardous waste'. Here, the key (but non-binding) threshold is where the facility has the capacity to hold more than 50,000 tonnes per year. The Onyx proposals are more than three times this threshold.
- 13.31 This development proposal may require that Onyx undertakes an EIA, and will also require a waste management licence.



DO NOT SCALE



Location Plan



Figure Number 13.1: Materials Recovery Facility and Waste Transfer Station, Hollingdean (Site Option A)



Buildings Footprint
 Site Outline
 ILLUSTRATIVE LAYOUT ONLY

DO NOT SCALE

Location Plan



Figure Number 13.2: Materials Recovery Facility and Waste Transfer Station, Hollingdean (Site Option A)



Figure 13.3: Photo of Hollingdean depot, Brighton (looking south, option A in the foreground)

14.0 WASTE TRANSFER STATION & NEW TECHNOLOGY FACILITY-RDF PLANT, PEBSHAM

Proposals

14.1 Onyx has two proposals for the Pebsham site. The first proposal is for a waste transfer station to be operational by 2007 to serve the eastern section of the Plan area with a capacity of 75,000 tonnes per annum. Onyx also proposes a new technology facility (possibly anaerobic digestion) to replace the existing RDF plant at Pebsham after its decommissioning. It would treat 75,000 tonnes of waste per annum, but would not be operational until 2012. Onyx intends to close the existing household waste recycling centre on the landfill site and develop a new HWRS on the new technology site. Figure 14.1 illustrates a building footprint plan and figure 14.2 a photograph of the site.

Location

14.2 Pebsham is located to the north of the A259 between Bexhill and Hastings. The 7.1-hectare site is an existing waste management facility and includes a refuse-derived fuel plant and a civic amenity site. It also contains a number of disused industrial buildings, including a disused gypsum site that could be converted to waste related use. The RDF plant treats approximately 75,000 tonnes of household waste per year from the Hastings and Eastbourne Boroughs, Rother District and part of Wealden District.

Surrounding land uses

14.3 Immediately to the east of the RDF plant is the Pebsham landfill site. At current rates of use, it is anticipated that void space at the site will be exhausted by 2005. Beyond the Pebsham landfill is an area of open space and then the small settlement of Harley Shute, followed by the western urban edge of Hastings, approximately 1.5 kms away.

14.4 South of the RDF plant are some residential dwellings. Pebsham itself lies to the west of the site, on the eastern urban edge of Bexhill. To the north of the site is open land and some small forested areas.

Environmental issues

Landscape

14.5 In order to limit views from the various residential areas to the waste facilities, Onyx proposes to employ screening and landscaping, together with careful siting and design at the Pebsham site. By 2005, it is anticipated that landfilling activities would be completed with landscaping and restoration activities underway.

Traffic and access

14.6 At the present time, road access to the Pebsham site is insufficient given the demands imposed on the site. The Onyx proposals for Pebsham may actually result in an improvement to the existing traffic access to and from the site. The new technology to be located at Pebsham (in 2012) has the same capacity as the existing RDF plant. The current landfill operations at Pebsham have an annual input of 454,000 tonnes per year and are due to be completed by 2005. The completion of landfill operations will remove a significant element of the traffic volume off-setting the traffic generated by operations relating to the proposed waste transfer station. The traffic associated with the transfer station may only be 10 to 15% of that of the existing landfill activities. Even with the addition of traffic associated with the new technology facility in 2012, the road network should have sufficient capacity.

Noise and odour

14.7 The close proximity of housing to the Pebsham site requires that Onyx proposes sufficient noise mitigation and insulation in the design of the new technology plant and the waste transfer station at Pebsham. If the chosen technology is anaerobic digestion, then issues such as odour nuisance must be given detailed consideration in the design and operation of the plant.

Land contamination

14.8 Previous landfill operations at Pebsham may result in issues associated with the generation of methane gas (a by-product of anaerobic digestion of waste material and a significant greenhouse gas), which may migrate away from the landfill site. A detailed investigation may be required to assess the implications arising from methane generation.

Planning issues

14.9 Pebsham is allocated as a potential Countryside Park in the Rother District Local Plan.

14.10 The site has no specific allocation in the first deposit draft of the WLP. In the Joint Technical Report, however, recommendation 4(b) seeks to allocate Pebsham as an area of search for an additional MRF/waste transfer station in the second deposit WLP.

14.11 It must be noted that recommendation 4(a) seeks to allocate Pebsham as an alternative EfW site (in place of Mountfield Mine). Onyx supports both recommendations in principle. However, as noted earlier, Onyx intends to site both a new technology facility in 2012 (in preference to an EfW incineration plant) and a waste transfer station (in 2007) at Pebsham.

- 14.12 The new technology development proposal is likely to require an EIA. However due to the uncertainty over the exact proposals and the development timeframe, such issues will not be examined until a later date.
- 14.13 The waste transfer station proposal is unlikely to be classed as EIA development, but will require a waste management licence.



DO NOT SCALE

	Buildings Footprint
	Site Outline
ILLUSTRATIVE LAYOUT ONLY	

Location Plan



Figure Number 14.1: Waste Transfer Station and New Technology Facility, Pebsham



Figure 14.2: Photo of RDF plant, Pebsham (looking north)

15.0 COMPOSTING FACILITY- GOLDEN CROSS INDUSTRIAL ESTATE, HAILSHAM

Proposals

15.1 By 2005, Onyx proposes to construct a 45,000 tonnes per annum enclosed composting facility on the proposed Golden Cross Industrial Estate extension. This composting facility would play a key role in Onyx's integrated waste management strategy as it would treat the majority of the green garden waste from the catchment area. Figure 15.1 illustrates a building footprint plan and figure 15.2 is a photograph of the site.

Site description

15.2 The site is a greenfield site, but appears to consist of made-ground covered by vegetation. The site is intended to be the phase 1 expansion of the adjacent Golden Cross Industrial Estate and has a total area of over 7.7 acres. However, Onyx will not require the whole site and intends to locate the composting facility in the western area, away from any potential receptors.

Surrounding land uses

15.3 Immediately east of the proposed site is the existing Golden Cross Industrial Estate. This is a predominately car-based industrial site with five large working units and a number of smaller units. Parts of the area were littered with vehicle debris. Access to this site is along Hackhurst Lane. However, this site is lined by a number of residential properties and has insufficient width to accommodate safe HGV movement in both directions, and therefore is inadequate for this project.

15.4 Northeast of the industrial estate are more residential properties, accessed by a narrow country road. Southwest of the proposed site are more residential properties and a roadside restaurant. These line the A22. The remaining land around the site is in agricultural use. Land immediately to the south of the site is allocated for phase 2 of the expansion of the industrial estate.

Environmental issues

Air quality

15.5 Potentially, the key environmental issue relating to the proposed composting facility is Environmental Agency concerns over bioaerosols within 250 metres of a workplace. Such concerns may be allayed through operating the decomposition and pre-processing operations in-vessel, housing all plant and machinery internally, treating all gases and odours in a bioplant and employing other best practice handling and operating procedures during the process. An independent

risk assessment would be conducted in order to confirm that bioaerosols are not an issue with regard to the proposed operations at Golden Cross.

Traffic and access

- 15.6 The A22 provides the site with very good access to the strategic transport network. Sufficient traffic access would be vitally important to this composting facility, as it would need to receive green waste from various facilities within the catchment area. A new access road would be constructed off the A22, removing the existing industrial estates traffic from Hackhurst Lane and therefore greatly improving the environmental quality of the area for the residents of Hackhurst Lane. The proposed access road would improve the road safety of the area, as there are high levels of existing traffic accessing Hackhurst Lane from the A22. This new access road would therefore improve road safety by linking off the A22 using a new roundabout. Onyx would be prepared to enter into a Section 106 legal agreement to secure any necessary and appropriate highway improvements associated with its proposals.

Landscape

- 15.7 The Hailsham site is outside of the AONB. There is an extensive covering of vegetation around the perimeter of the site, which could be maintained to provide screening for the site. The site is relatively isolated and the majority of the houses in its vicinity do not have direct views. Views from the A22 are greatly reduced by a roadside vegetation screen. Many of the surrounding fields have their own vegetation field boundaries.
- 15.8 The facility would be totally enclosed and would have the external appearance of a standard industrial unit, very similar to the other industrial units that will be constructed on the estate. Post-construction landscaping and planting around the industrial units would further reduce any landscape issues.

Land use

- 15.9 The facility proposals are compatible with the existing land uses surrounding the site, and the proposed industrial estate where the composting facility would be located. The proposals are unlikely to have any operational effects. One potential issue is the possibility of nuisance odours, a by-product of the degradation of the green waste. Standard operating practices should ensure that such issues are kept to a minimum. However, careful siting of the bio-plant (where the bio-gases responsible for the odours are treated) at the western edge of the site would ensure that any odour effects would be kept within acceptable levels.

Ecology and soil

- 15.10 The soil consists of made-ground and the surface level is considerably higher than that of the adjacent industrial estate. The vegetation on site appears to be of limited ecological value.

Public rights of way

- 15.11 A public right of way runs parallel to the northern boundary of the site, although it is unlikely that the proposals would affect public accessibility.

Planning issues

- 15.12 The site is allocated in the Wealden Local Plan as an extension to the neighbouring industrial estate. The proposed composting facility is compatible with this planning policy.
- 15.13 In the first deposit draft of the WLP, Diplocks Way (Hailsham) is allocated in Policy WLP8 for MRF/waste transfer station to serve the central part of the Plan area. In the Joint Technical Report, however, it is noted that there is little available land at Diplocks Way, and it may be developed for other purposes and may not be available for waste uses. In response to this, recommendation 7 seeks to allocate a site near Eastbourne (Tutts Barn) for MRF/WTS uses.
- 15.14 Onyx agrees with the limitations regarding Diplocks Ways as a site for a waste facility. However, Onyx proposes to locate a waste transfer station at Maresfield Camp, north of Uckfield, in place of a similar facility at Diplocks Way or Tutts Barn. Onyx also seeks to locate a composting facility at Golden Cross, Hailsham that will treat the majority of the green garden waste arisings in the catchment area.
- 15.15 The proposals fall under Schedule 2 of the EIA Regulations. In the main Regulations they exceed the 'exclusive threshold' for its project type as the proposals exceed 0.5 hectares.
- 15.16 The proposals are listed under Annex A of the Guidance Circular 02/99 for the Regulations as A36, 'Installations from the disposal of non-hazardous waste'. Here, the key (but non-binding) threshold is where the facility has the capacity to hold more than 50,000 tonnes per year. The Onyx proposals are for 45,000 tonnes per annum, below this threshold.
- 15.17 However notwithstanding the above, EIA may be required as the proposals may have significant environmental effects. Although the site does not appear to be a 'sensitive area' (as defined in the Regulations), the Environment Agency (who must grant a waste management licence to allow it to operate) have adopted the position of a "*presumption against permitting (and objecting to any planning*

application) of any new composting process where the boundary of the facility is within 250 metres of a workplace or the boundary of a dwelling, unless the application is accompanied by a site-specific risk assessment, based on clear, independent scientific evidence which shows that the bio aerosol levels are and can be maintained at appropriate levels at the dwelling or workplace”.

- 15.18 There is an existing industrial estate within 100 metres of the proposed facility and a number of residential dwellings are within 250 metres. A bioaerosol study would need to be undertaken to satisfy the Environment Agency and to obtain a waste management licence to allow composting to proceed.
- 15.19 Traffic is likely to be a significant environmental issue. The A22 provides good strategic access, although the composting facility will create a significant level of traffic over the existing baseline level. Safety issues relating to access off the A22 will need to be examined, although a proposed roundabout may address safety issues.
- 15.20 Overall, it is unclear whether an EIA would be required for the Hailsham site. The main issue is local air quality and the Local Planning Authority may deem this to be significant enough to warrant an EIA. A screening opinion will be requested at an appropriate time.



DO NOT SCALE



Location Plan



Figure Number 15.1: Enclosed Green Waste Composting Facility, Golden Cross, Hailsham



Figure 15.2: Photo of Golden Cross, Hailsham (looking west)

16.0 CONCLUSION

- 16.1 This paper has set out the planning and environmental policy issues that have been central in the formulation of Onyx's Best and Final Offer submission for the East Sussex and Brighton & Hove Integrated Waste Management contract.
- 16.2 Onyx has based the range, size, scale and location of the waste facilities in its strategy on the available policy guidance at EC, national, regional and local levels.
- 16.3 Onyx believes that its strategy is the BPEO to manage the household waste arising in the combined authorities, as per the criteria in PPG10. Key considerations include the proximity principle, regional self-sufficiency and the waste hierarchy.
- 16.4 Waste Strategy 2000 has also been central in guiding the development of the strategy. This is the National Waste Strategy and contains recycling targets based on the EC's Landfill Directive.
- 16.5 The first deposit draft of the East Sussex and Brighton & Hove Waste Local Plan and the subsequent Joint Technical Paper, provide guidance at a local level on matters such as site selection and the size of the waste facilities.
- 16.6 Onyx believes that its resulting strategy is realistic, achievable, meets the contract requirements and is ultimately deliverable. The strategy formulation process considers a very wide range of planning and environmental issues, from a European down to a local level, and has included various revisions to the strategy based on consultations and refinement of the WLP.
- 16.7 Overall, Onyx believes that its strategy will address the waste arisings in the Plan area in a sustainable and practicable manner through, and beyond, the contract period.
- 16.8 Onyx also believes that in consideration of the volume and provenance of waste arisings, the best available projections for waste growth, and the recycling and recovery targets set out in the contract specification, the locations, nature and sizes of the selected waste treatment facilities represent a rational, affordable and deliverable BPEO solution to the future of solid waste management in East Sussex and Brighton & Hove.

Glossary of Abbreviations

AONB	Area of Outstanding Natural Beauty
BAFO	Best And Final Offer
BPEO	Best Practicable Environmental Option
EA	Environment Agency
EfW	Energy from Waste
EIA	Environmental Impact Assessment
ES	Environmental Statement
HGV	Heavy Goods Vehicle
HWRs	Household waste recycling site
IWMS	Integrated waste management strategy
LPA	Local Planning Authority
MRF	Materials recovery facility
MSW	Municipal solid waste
NSCA	National Society for Cleaner Air
PPG	Planning policy guidance
RDF	Refuse Derived Fuel
RPG	Regional planning guidance
SPZ	(groundwater) Source Protection Zone
WLP	Waste local plan
WWTW	Waste water treatment works