

Headline Comments on the relevant proposed Policies (& supporting paragraphs) Waste & Minerals Policy, ESCC Preferred Strategy for Waste

Preferred Option Selection (section 12)

- Although the Preferred Option states here that there will be further investigations into the identified areas of search, we consider it is unfair that only Ashdown Brickworks is referred to specifically. It should be assessed together with all the other identified areas of search.
- Object to the complete paragraph which relates to Ashdown Brickworks as potentially suitable for landfill.
- The Preferred Option should only explain the way in which ESCC intend to select sites for land disposal of waste. This selection process is described in the Preferred Strategy as:-
 1. Identify and allocate Land Disposal Sites which are allocated avoiding water resources or 'valued environments' (adverse effects on the environment and on the community');
- Identify potential at existing disposal sites, or at mineral voids, avoiding water resources and 'valued landscapes';
- Allocate locations for land disposal sites for waste close to waste arisings, providing they satisfy the selection criteria.

Policy CS6 (6 'bullet points' in the 'Policy')(Section 12)

1. Ashdown Brickworks should not be included in the Primary Area of Search (Plan 4)

Ashdown Brickworks fails on both of the Council's key criteria for inclusion in the Primary Area of Search. It is within 500 metres of 'valued environments' such as areas of ecological importance. There are also concerns over the risk of water pollution and contamination of public water supplies.

If there is a need for a land disposal site for waste, there are several other sites which could be used. The Scott Wilson Report, which has been published as 'evidence base' for this Core Strategy, has stated that further detailed assessment of these areas is required. Until such work is carried out, Ashdown Brickworks should not be 'singled out' as a Preferred Option for waste disposal.

2. There will be an unacceptable impact on the environment

Ashdown Brickworks is very close to High Woods Site of Nature Conservation Interest. Also Little High Wood Site of Nature Conservation Interest is within the Ashdown brickworks site.

There are other potential risks to the ecology of the area, including harm to important breeding birds from scavenging birds, and potential adverse impacts to the ecology of ponds and woodland in the vicinity of the brickworks.

3. There would be cumulative adverse impacts on the Local Community. This harm would be greater than when the current Waste Local Plan was prepared.

As well as the inevitable adverse impact on the significant number of new homes within the vicinity of Ashdown brickworks, there is now also a new Bexhill High School for over 1600 pupils within 700 metres of the site. This will increase substantially the number of people either living, or at school, within 1500 metres of the site.

As well as the harm to the environment of the local residents and school children, there are a significant number of people who frequent the area in the vicinity of the brickworks for leisure purposes, such as members and guests at the High Woods Golf Club and those who enjoy the High Woods for woodland walks. Both of these locations are within 250 metres of the Ashdown brickworks site. Also, the Bexhill Cemetery, immediately to the east of the brickworks, could experience harm to its environment and particularly to its tranquility.

4. There is very poor vehicular access to the Ashdown Brickworks

The existing roads in the vicinity of Ashdown brickworks are totally unsuitable to service the use of Ashdown brickworks as a land disposal site.

In order for this site to be satisfactorily accessed by waste disposal vehicles, it would require the Bexhill-Hastings Link Road to be completed. This is currently programmed to open by the end of 2012, already 4 years later than planned. It would also require the construction of further roads in the area, as well as a new access into the site. This total infrastructure is very unlikely to be constructed for several years, if at all.

5. The availability of Ashdown brickworks for waste disposal by landfill is not confirmed

This Preferred Strategy, in Section 12, accepts that there are operational constraints to using the Ashdown brickworks site for landfill, and that its potential capacity for landfill together with its availability / timing would need to be established in more detail.

This uncertainty on the site's availability should lead the site selection process away from this site, for this reason alone, as the Preferred Strategy seeks a site which is available in the short-term. In the medium to long term there should be an increasing shift towards minimising waste; and disposing of waste in other more suitable ways, rather than through landfill.

Appendix A - Strategy for Implementation

Policy CS6 - Delete all References to Ashdown Brickworks

The Strategy for Implementation of land disposal facilities for residual waste should be based on the identification and allocation of suitable locations. These locations have not yet been agreed by East Sussex County Council or Brighton and Hove City Council. This is clearly stated in this Document (Section 12) and also in the Scott Wilson Land Disposal Area Identification Study October 2009. The specific references to Ashdown Brickworks in the 'Strategy for Implementation' is pre-judging the outcome of this Study.

Please do make your views known via one of the ways set out below but importantly, please let East Sussex County Council know your views and objections about their Preferred Strategy for Waste before 2nd December 2009.

For further information contact BALI on 01424 843046, 01424 220109 or 01424 845688, or mobile 07814 895874, or write PO Box 194 Bexhill-on-Sea TN40 9BD.