

**Partial Review of  
Draft South East Plan  
Revised Policy M3**

**SUSTAINABILITY APPRAISAL  
ANNEX**

**Summary**

**Prepared for  
South East England Regional Assembly**

**by  
Land Use Consultants**

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43 Chalton Street  
London NW1 1JD  
Tel: 0207 383 5784  
Fax: 0207 383 4798  
[london@landuse.co.uk](mailto:london@landuse.co.uk)



# SUMMARY OF REVISED OPTION E SUSTAINABILITY APPRAISAL

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## BACKGROUND

1. The South East of England Regional Assembly (the Assembly) is undertaking a partial review of Policy M3 (Primary Aggregates) in the South East Plan to find ‘*a more rounded and forward looking methodology on which to base a revised sub-regional apportionment policy for primary land-won aggregates*’. This is in response to a recommendation made in the 2004 Examination in Public Panel report<sup>1</sup>. Policy M3 sets out the volume of primary aggregates that each Minerals Planning Authority in the South East region will need to provide to meet the regional aggregate supply figure set out in the National and Regional Aggregates Guidelines<sup>2</sup>. These volumes of supply are for land-won sand and gravel (i.e. not marine-dredged) and crushed rock.
2. To inform the partial review of Policy M3 in the draft South East Plan, the Assembly appointed Land Use Consultants (LUC) in 2007 to develop a methodology to calculate how to share the regional targets for primary land-won sand and gravel and crushed rock between the Mineral Planning Authorities of the South East Region, having regard to sustainability and practical factors. The apportionment methodology and the six options developed are described in a separate report<sup>3</sup>. During May to August 2008, the Assembly consulted on three of the options for the revised apportionment<sup>4</sup>.
3. Reflecting the responses received during the consultation period, the Assembly has now proposed a revised sand and gravel apportionment for Policy M3 that is based on a modified version of one of the options generated by the LUC apportionment methodology in 2007 – referred to as Revised Option E.
4. Since the apportionment methodology was developed for the Assembly, the Government has also been reviewing the amount of aggregates that each region should plan to provide for (the regional aggregate supply figure). The Government’s consultation draft Guidelines<sup>5</sup> proposed that the amount of sand and gravel and crushed rock that the South East region needs to provide between 2005 and 2020 should be slightly lower than the 2003 Guidelines (12.18 million tonnes per year instead of 13.25 million tonnes per year). However, the Assembly is challenging the Government over the sand and gravel figure, questioning why it is not reduced even further to reflect the fact that actual production has been below the 2003 Guidelines.

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<sup>1</sup> The Panel report on the Examination in Public of the review of RPG9 for waste and minerals (December 2004) recommended that the Minerals Review Group of the South East England Regional Aggregates Working Party (SEERAWP) should maintain its momentum to find a more rounded and forward looking methodology on which to base a revised sub-regional apportionment for inclusion in the next review of minerals policies.

<sup>2</sup> *National and Regional Guidelines for Aggregates Provision in England, 2001-2016*. Published by the former Office of the Deputy Prime Minister (now CLG), June 2003.

<sup>3</sup> *Primary Aggregates Sub-Regional Apportionment in South East England*. Final Report. Prepared for the Assembly by Land Use Consultants, November 2007.

<sup>4</sup> *Partial Review of RPG9 and the Draft South East Plan. Review of Sub-regional Allocation of Land-won Aggregates. 15 May – 8 August 2008 Consultation Document*. The Assembly, May 2008.

<sup>5</sup> *Draft Revised National and Regional Guidelines for Aggregates Provision in England, 2005-2020. Consultation*. Published by the former Office of the Deputy Prime Minister (now CLG), April 2008.

The Assembly's response<sup>6</sup> to the consultation on the draft Guidelines proposes that the South East's regional supply figure for sand and gravel should be 9.01 mtpa.

5. In carrying out the partial review, the Assembly is required to undertake a Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA), in accordance with the requirements of European Directive 2001/42/EC (the 'SEA Directive')<sup>7</sup>, the Planning and Compulsory Purchase Act 2004 and Planning Policy Statement 12 (PPS 12). In line with Government guidance, both of these requirements will be satisfied through a single appraisal process referred to as a Sustainability Appraisal<sup>8</sup>.
6. The Assembly published a SA Scoping Report<sup>9</sup> (the first stage in the SA) for consultation in February 2007 alongside the partial review Draft Project Plan. That Scoping Report notes that subsequent stages of the SA will be undertaken by independent consultants. To this end, the Assembly commissioned LUC to undertake the SA in March 2007.
7. The work that LUC undertook in 2007 culminated in a full SA Report<sup>10</sup>, which constituted all Sustainability Appraisal tasks in Stages A to C and Task D1 (Consulting on the SA Report alongside the public consultation document), as described in the ODPM SA Guidance<sup>11</sup>. The full SA Report described the potential sustainability effects of the six original options for sand and gravel and crushed rock generated by the LUC apportionment methodology in 2007. No consultation responses received by the Assembly during the May-August 2008 consultation referred specifically to the SA Report.
8. As the Assembly has now proposed the use of a revised apportionment for sand and gravel within Policy M3 that is based on a modified version of one of the six options, LUC was commissioned to undertake a further iteration of the SA to understand the potential sustainability effects of the final proposed sand and gravel apportionment. This culminated in the production of an Annex to the full SA Report, which this note summarises.

## **PURPOSE OF THE SUSTAINABILITY APPRAISAL**

9. The purpose of sustainability appraisal is to promote sustainable development by integrating sustainability considerations into the preparation and adoption of policies, plans and programmes.
10. The objective of Strategic Environmental Assessment, as defined in Article 1 of the SEA Directive is *'to provide for a high level of protection of the environment and to*

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<sup>6</sup> [www.southeast-ra.gov.uk/documents/events/24/rpc\\_minutes\\_240908.pdf](http://www.southeast-ra.gov.uk/documents/events/24/rpc_minutes_240908.pdf) paragraph 5.41.

<sup>7</sup> *Directive 2001/42/EC of the European Parliament and of the Council on the Assessment of the Effects of Certain Plans and Programmes on the Environment*, 27 June 2001

<sup>8</sup> From this point on, references to the Sustainability Appraisal (SA) shall be taken as meaning the SA incorporating SEA.

<sup>9</sup> *Partial Review of Draft South East Plan: Revised Apportionment of Primary Land-Won Aggregates. Scoping Report*. The Assembly, February 2007.

<sup>10</sup> *Partial Review of Draft South East Plan Policy M3: Sustainability Appraisal Report*. Prepared for the Assembly by Land Use Consultants, November 2007.

<sup>11</sup> *Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks*. ODPM, November 2005.

*contribute to the integration of environmental considerations into the preparation and adoption of plans...with a view to promoting sustainable development’.*

11. The Government SA Guidance<sup>12</sup> on sustainability appraisal explains the difference between SEA and sustainability appraisal of development plans. Sustainability appraisal includes a wider range of considerations, extending to social and economic impacts of plans, whereas SEA is more focussed on environmental impacts.

## **AIM OF THE SA ANNEX**

12. The Annex, which should be read alongside the full SA Report, describes the revised sand and gravel apportionment figures for each MPA proposed in the revisions to Policy M3, and the likely significant sustainability effects compared to the previous six apportionment options appraised in the full SA Report published in November 2007. The method used to appraise the proposed revised sand and gravel apportionment is exactly the same as that used for the earlier six options, which is described in the full SA Report and is therefore not repeated in the Annex. Note that the Annex does not repeat the appraisal of the apportionment options for crushed rock, as this is not proposed to change in Policy M3 – this is discussed further in the Annex.
13. The SA of the partial review has been undertaken in line with the SA guidance, and seeks to meet the requirements of both the Planning and Compulsory Purchase Act 2004 and the SEA Directive (European Directive 2001/42/EC). However, the Annex has not repeated all of the required elements of an ‘Environmental Report’ (the output required by the SEA Directive), as they have not needed to be changed since the full SA Report was produced in November 2007. **Table 1.1** of the Annex sign-posts where SEA Directive requirements are covered in the full 2007 SA Report or the SA Annex.

## **REVISED APPORTIONMENT OPTION FOR SAND AND GRAVEL**

14. Reflecting the responses received during the consultation period and advice from the South East MPAs on deliverability, the Assembly has now proposed a revised sand and gravel apportionment for Policy M3 that is based on a modified version of Option E ‘Demand and Resources’ generated by the LUC apportionment methodology in 2007, which is called ‘Revised Option E’. This apportionment has been applied to the lower regional supply figure of 9.01 mtpa which the Assembly is proposing. The percentages and apportionment tonnages for each MPA resulting from applying the Revised Option E are shown in **Table 1**.

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<sup>12</sup> *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*, Office of the Deputy Prime Minister (ODPM), November 2005.

**Table 1 Revised apportionment for sand and gravel resources in Policy M3**

<b>Minerals Planning Authorities</b>	<b>Revised apportionment (million tonnes per annum)</b>	<b>Percentage of regional total (%)</b>
Berkshire	1.00	11.1
Buckinghamshire	0.86	9.5
East Sussex/Brighton and Hove	0.07	0.8
Hampshire/Portsmouth/Southampton/ New Forest	1.62	18.0
Isle of Wight	0.09	1.0
Kent	1.40	15.5
Medway	0.11	1.2
Milton Keynes	0.16	1.8
Oxfordshire	1.58	17.5
Surrey	1.32	14.6
West Sussex	0.79	8.8
<b>Total</b>	<b>9.01</b>	<b>100</b>

Source: Revised Policy M3 and Supporting Text, the Assembly (Executive Committee Meeting, 1 December 2008 Agenda Item 9 – Annex 1, [http://www.southeast-ra.gov.uk/committees\\_executives2008.html](http://www.southeast-ra.gov.uk/committees_executives2008.html))

## **SUSTAINABILITY APPRAISAL OF REVISED OPTION E**

15. Land Use Consultants undertook a sustainability appraisal of the apportionment resulting from Revised Option E, using the same methodology employed for the appraisal of the original six potential sub-regional apportionment options for sand and gravel provision in the South East of England. Revised Option E was appraised against the 13 relevant IRF Headline (or SA) Objectives taken from the SA Framework (see Chapter 5 of the full SA Report), to determine the potential impacts on each Minerals Planning Authority, compared to the current apportionment. The detailed SA Papers describing the key issues, assumptions used and SA findings for each Objective or group of related Objectives were updated to include the findings for Revised Option E, and these can be found in **Appendix 1** of the Annex.
16. A large number of assumptions were necessary in the SA in order to identify potential impacts of the six original apportionment options and Revised Option E, and how they might affect each MPA in the South East. The approach taken to the SA and the assumptions used are described in more detail in Chapter 3 of the full SA Report and throughout the detailed ‘SA Papers’ in **Appendix 1** of the Annex.
17. As well as the assumptions, a number of limitations of the SA were also noted, which must be taken into account when reading the SA conclusions. These are detailed in Chapter 3 of the Annex.

## Appraisal Findings

18. **Table 2** provides a summary of the potential sustainability effects of Revised Option E, in relation to each of the sustainability objectives for each MPA. Revised Option E provides the MPAs of Berkshire, East Sussex, Hampshire, the Isle of Wight, Kent and Medway with apportionments that are negligibly different to the current apportionment. As such, this Option is most likely to have a negligible impact on these MPAs with regard to all SA Objectives. Of the remaining MPAs, Buckinghamshire, Milton Keynes, Oxfordshire and West Sussex are provided with a greater apportionment of sand and gravel under Revised Option E compared to the current apportionment; Surrey a lower apportionment.

**Table 2 Overview of the potential sustainability effects (significant/minor, positive/negative, short term [ST]/long term [LT]) of Revised Option E for sand and gravel sub-regional apportionment**

Sustainability Objective(s)	Berkshire	Bucks	East Sussex	Hampshire	Isle of Wight	Kent	Medway	Milton Keynes	Oxfordshire	Surrey	West Sussex
<b>Revised Option E</b>											
Proximity and transport	0	+	0	0	0	0	0	+	+	-	-
Flooding	0	0	0	0	0	0	0	ST -	ST -	0	0
								LT +	LT +		
Health and air pollution	0	+	0	0	0	0	0	-	+	+	+
Previously Developed Land	0	0	0	0	0	0	0	0	0	0	0
Biodiversity and air pollution	0	-	0	0	0	0	0	0	-	+	-
Biodiversity (SOA)	0	+ -	0	0	0	0	0	-	+ -	+ -	+
Heritage	0	0	0	0	0	0	0	0	0	0	0
Landscape	0	0	0	0	0	0	0	0	-	+	-
Green Belt	0	-				0			-	+	
Water quality	0	-	0	0	0	0	0	-	0	+	-
Employment	0	0	0	0	0	0	0	+	0	0	0
Tourism	0	-	0	0	0	0	0	-	0	0	-

19. Compared to the current apportionment in the draft South East Plan, Revised Option E could potentially be more sustainable with regard to the **proximity principle** within Buckinghamshire, Milton Keynes and Oxfordshire. These MPAs have a high proportion of sand and gravel resource within growth areas/sub regions, so the greater apportionment results in a positive effect for the proximity principle. Conversely, Revised Option E could potentially have a minor negative impact in Surrey and West Sussex with regard to the proximity principle SA Objectives.
20. Under Revised Option E, there is potential for a short-term minor negative impact and long-term minor positive impact on **flooding** in Milton Keynes and Oxfordshire due to the greater apportionments provided to these authorities under Revised Option E and the associated implications for increased flood risk in the short-term and contributions to flood alleviation in the long-term.

21. In four MPAs, Revised Option E could potentially be more sustainable than the current apportionment with regard to **human health**: Buckinghamshire, Oxfordshire, Surrey and West Sussex – with all potentially receiving a minor positive impact under this option. The opposite is true for Milton Keynes, which could potentially have a minor negative impact as it has a high proportion of its resource close to urban areas and a greater apportionment under Revised Option E.
22. Buckinghamshire, Oxfordshire and West Sussex have a high proportion of their sand and gravel resource within or in close proximity to a national or international **biodiversity** designation, and therefore the greater apportionments provided by Revised Option E could lead to a minor negative impact in these MPAs. In contrast, the Option provides Surrey, with a lower apportionment and therefore could potentially have a minor positive impact for biodiversity on this MPA.
23. Due to the balance of potential habitat gain versus potential habitat loss within Strategic Opportunity Areas, Revised Option E could have either a minor positive for **habitat creation** or minor negative impact on **habitat loss** in Buckinghamshire, Oxfordshire and Surrey, dependent upon the target habitats considered. In addition, this Option could have minor positive impact in West Sussex and a minor negative impact in Milton Keynes.
24. A high proportion of the sand and gravel resource within Oxfordshire, West Sussex and Surrey is within a **landscape** designation. As such, Revised Option E could have minor negative impacts on the first two MPAs, and a minor positive impact on Surrey. Similarly, a high proportion of the sand and gravel resource within Buckinghamshire, Oxfordshire and Surrey is within the **Green Belt**, leading to minor negative impacts in the first two MPAs under Revised Option E, but again a minor positive impact in Surrey.
25. Due to the proportion of the sand and gravel resource of Buckinghamshire, Milton Keynes and West Sussex within **groundwater** source protection zones 1 to 3, Revised Option E could potentially have a minor negative impact in these MPAs. Much like other SA Objectives, Revised Option E could have a minor positive impact with regard to water resources.
26. Revised Option E has a negligible impact on all MPAs with regard to **previously developed land**, and a negligible impact on all MPAs except Milton Keynes with regard to **employment**. Compared to the current apportionment, Revised Option E could have a minor negative impact on **tourism** in Buckinghamshire, Milton Keynes and West Sussex, but a negligible impact in all remaining MPAs. These three MPAs have a high proportion of their sand and gravel resource within a regional priority area for tourism and a greater apportionment under Revised Option E, a combination that could have a minor negative impact on tourism.

## Conclusions

27. With the SA assumptions and limitations in mind, the overarching themes from the findings of the appraisal of the sand and gravel apportionment options are:
  - **Revised Option E does not have any significant positive or significant negative impacts on any MPAs with regard to any of the SA Objectives.** This is due to

the fact that the apportionment Option does not differ widely from the current apportionment.

- The negligible increase or decrease compared to the current apportionment provided to six of the MPAs means that regardless of other factors, Revised Option E will most likely lead to negligible sustainability impacts in these MPAs.
- The remaining five MPAs would see a minor increase or decrease compared to the current apportionment. Of these five MPAs, Surrey fairs best on sustainability grounds under Revised Option E, with six potential minor positive impacts and two minor negative. Of the MPAs provided with a greater apportionment under Revised Option E, all have the same number of potential minor negative impacts – five, with the minor positive impacts varying from four in Oxfordshire to two in West Sussex.

### **Potential sustainability implications of the total regional supply figure**

28. The potential sustainability implications of a change in the total regional aggregate supply figures (from 12.18 mtpa in the Government’s draft Guidelines to 9.01 mtpa as per the Assembly’s response to the draft Guidelines) are not drawn out in detail by this sustainability appraisal due to the SA methodology employed. However, the regional implications of this change have been considered.
29. On a very basic level, a greater regional apportionment (i.e. 12.18 mtpa as opposed to 9.01 mtpa) could have a greater negative impact on a number of SA objectives such as climate change, road congestion, health, amenity, water consumption, biodiversity and flooding in the short-term etc. as there would need to be greater extraction of sand and gravel leading to habitat loss, increased water consumption and greater processing and transport of minerals (and therefore increased pollution and greenhouse gas emissions). In contrast, the higher levels of extraction could have positive effects on the economy, the ability for everyone to live in a decent home and biodiversity and flooding in the long-term through habitat and flood storage creation.
30. There may also be potential negative effects relating to increased transport of imported materials if the South East region makes provision for a lower sand and gravel regional supply figure than in the draft Guidelines, as the region may not provide sufficient sand and gravel to meet demand, and imports from other regions may occur, which would in turn result in increased transportation of aggregate and therefore CO<sub>2</sub> emissions. However, recent research undertaken for the Assembly (not yet published) has shown that actual demand for land-won sand and gravel is lower than the current and draft Guidelines suggest, and that falling production in the South East region is not resulting in increasing import of sand and gravel from other regions.

### **Implementation**

31. The MPAs have a key role to play in the implementation of revised Policy M3, as they will need to identify and allocate sufficient sites for sand and gravel and crushed rock operations within their Minerals Development Frameworks. Many of the potential sustainability effects identified within this SA and the uncertainties relating to the nature and scale of those effects will need to be explored through the lower-tier SAs

undertaken by the MPAs for the Development Plan Documents within their Minerals Development Frameworks.

## **PROPOSALS FOR MONITORING**

32. The Government's SA Guidance states that it is not necessary to monitor everything. Instead, monitoring should be focussed on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken.
33. In theory, it would be the significant effects of Revised Option E that need to be monitored as it is the selected option to be incorporated into the revised Policy M3; however, as set out in the Conclusions section, there are unlikely to be any significant effects from the revised sand and gravel apportionment (Revised Option E). While no significant sustainability effects have been identified for the revised sand and gravel apportionment in Revised Policy M3, it will still be important to monitor targets and indicators relating to minerals extraction so that any negative impacts can be reduced through the identification of trends, or indeed positive impacts enhanced. Therefore, it is recommended that the framework for the AMR set out in the draft South East Plan is still followed.

Land Use Consultants

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43 Chalton Street  
London NW1 1JD  
Tel: 0207 383 5784  
Fax: 0207 383 4798  
[london@landuse.co.uk](mailto:london@landuse.co.uk)