

West Sussex Waste Local Plan

Main Modifications



Working in Partnership



Introduction

This document has been produced to include the main modifications that have arisen following the publication of the West Sussex Waste Local Plan. These changes are being suggested to update the Waste Local Plan prior to adoption to reflect the results of the public examination, public hearing sessions, factual amendments and errata.

Proposed changes

The following table lists the main modifications (WLP/MM/xxx) to the submitted West Sussex Waste Local Plan.

Text to be inserted is represented in *red italics* and text to be removed has been ~~struck through~~.

Modification ID reference	Policy Paragraph/Number/Table Number	Reason for change	Suggested change
MM/002	Chapter 2. paragraph 2.10 – 2.11.3	Update submitted Plan for adoption in respect of most up to date waste forecast study.	<p>2.10 Waste Management Capacity Shortfalls</p> <p>2.10.1 Progress has been made on the provision of new and more sustainable facilities, including those being provided in connection with the <i>Recycling and Waste Handling Contract (RWHC)</i> 'Reclaim' contract for recycling MSW and the Materials Resource Management Contract (MRMC) for the treatment of MSW. There remains, however, a need for further new facilities for the transfer, recycling, and treatment of C&I <i>other</i> waste streams and C&I. These new private facilities will be essential to a more sustainable approach to dealing with waste in the County and to move away from the current reliance on landfill. <i>These new facilities are also necessary to achieve net self-sufficiency in managing the waste generated within West Sussex (see paragraph 5.3.4).</i></p> <p>2.10.2 In order to assess future waste management capacity requirements, a number of scenarios on future recycling and treatment capacity provision were developed. <i>This allowed detailed consideration of the impact of a range of recycling and treatment targets on waste arisings throughout the plan period. In summary, the scenarios are:</i></p> <ul style="list-style-type: none"> <i>• Scenario 1- Current levels of recycling for both MSW and C&I waste continue through the Plan period;</i> <i>• Scenario 2- Current levels of recycling for MSW remain, but a small increase in recycling for C&I waste occurs;</i> <i>• Scenario 3- Increases in recycling levels for MSW and a greater increase in recycling of C&I waste occurs.</i> <p><i>Each scenario also considered the implications of waste growth at a base level (a) and higher growth (b) over the plan period. In summary, the scenarios range from the 'base case' in which there are minimal changes to the current (2010/11) situation, through</i></p>

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			<p>scenario 1, which is based on increased recycling and treatment which is fairly certain to be provided, and scenarios 2 and 3 which rely on increasing levels of recycling and treatment being achieved. In scenario 3, the 2031 recycling and landfill targets are set at a higher level than the National Waste Strategy for 2020 and are based on the targets in the South East Plan.</p> <p>2.10.3 <i>The following information breaks down the future waste capacity requirements of Scenario 3 under both base case waste growth and also higher waste growth. This is the Scenario that the Authorities consider is the most likely to occur during the Plan period. Although it is likely that scenario 1 will be achieved and there is a strong likelihood that scenario 2 will also be achieved, the following assessment is based on the maximum capacity shortfalls each for transfer, recycling, and treatment that arise under the various scenarios. Accordingly, it assesses the 'worst case' that the Authorities must plan for over the period to 2031 and, therefore, it allows a degree of contingency to be built into the Plan.</i></p> <p>Transfer</p> <p>2.10.4 There should be sufficient capacity for dealing with MSW through existing Household Waste Recycling Sites and through the existing MRF at Ford. There may be a capacity shortfall primarily for CDEW but also for some C&I waste but this depends upon the location of new recycling and treatment facilities. There may, however, be some spare capacity for dealing with C&I.</p> <p>2.10.5 If higher <i>waste</i> growth rates <i>are achieved occur</i>, there would be an <i>overall</i> need for an additional 0.15mtpa <i>0.14mtpa</i> of transfer capacity for all streams.</p> <p>Recycling</p>

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			<p>2.10.6 The evidence suggests that there will be limited additional material available for open-windrow composting and, therefore, no strategic need for new capacity.</p> <p>2.10.7 There is an anticipated shortfall in combined MSW and C&I recycling of 0.07mtpa <i>0.17mtpa</i>, with 8± <i>91</i>% expected to be originating from C&I (although the MSW waste stream seems to have spare capacity for recycling). A proportion of this additional capacity will be required to treat organic waste (estimated at around 0.052mtpa). Therefore, technologies such as IVC and AD may be required although this could be met by the headroom at the <i>Brookhurst Wood</i> MBT <i>facility</i>. It is also expected that a significant proportion of the additional recycling will take place using on-site segregation which would reduce the need for sorting facilities. However, this will be dependent on the nature of the recyclates and how they are collected.</p> <p>2.10.8 Under the <i>higher waste</i> growth rate scenario, there is an anticipated <i>overall</i> shortfall in combined MSW and C&I recycling of 0.17mtpa <i>0.27mtpa</i>, with 7786% expected to originate from C&I. The organic waste is estimated at around 0.05mtpa <i>0.08mtpa</i>.</p> <p>2.10.9 The CDEW waste stream seems to have <i>has sufficient</i> spare capacity for recycling. However, if higher <i>waste</i> growth rates are achieved occur, there would <i>only</i> be a need for an additional 0.003mtpa <i>0.06mtpa</i> of CDEW recycling capacity; <i>which is likely to be met through recycling by mobile plant or recycling at waste transfer stations this could be met, in theory, through the use of mobile plants.</i></p> <p>Other Recovery (including Treatment)</p> <p>2.10.10 There should be sufficient capacity for dealing with MSW through the new MBT at Brookhurst Wood which became <i>will become</i> operational in 2013.</p>

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			<p>There is, however, the need for <i>an</i> additional <i>0.07mtpa</i> of capacity to deal with C&I waste; however, most of this need could be met by the headroom at the MBT. <i>If higher growth rates occur, there is an anticipated overall shortfall of 0.09mtpa of recovery capacity.</i></p> <p>Residual waste requiring management following recycling and treatment</p> <p>2.10.11 <i>In addition to the provision of additional built capacity as outlined above, there would still be a need for additional landfill capacity to manage the residual waste arisings in the County; provision of such capacity would be necessary to achieve net self-sufficiency. Depending on how much inert waste is recycled and reused, there is a theoretical shortfall in new inert landfill capacity of 1.2mt 3.6 to 5.4mt over the plan period. However, current evidence suggests that much inert material is currently being used for beneficial purposes. The intention is that this trend should continue and, therefore, the need for new inert landfill capacity is likely to be substantially less. Although, there is limited inert landfill capacity within West Sussex at present, large amounts of inert waste is currently being used for beneficial purposes (i.e. recovery) such as for quarry restoration and landscape projects. Evidence suggests that current inert recovery capacity totals 3.8mt which provides sufficient space for future inert waste arisings. This trend is anticipated to continue in future and, therefore, there is no need for new inert landfill capacity to be allocated within this Plan.</i></p> <p>2.10.12 Depending on how much non-inert waste is recycled, composted, or treated, there is the theoretical <i>potential</i> need for up to <i>0.61mt 1-1.15mt</i> of new non-inert landfill capacity over the plan period (<i>if higher growth rates occur</i>) although the need could be as low as <i>0.47mt 0-2.5mt</i>. However, much will depend upon the impact of increases in landfill tax and other measures to 'encourage' investment in new private recycling and treatment facilities.</p>

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			<p>'Zero Waste to Landfill'</p> <p>2.10.13 The aspiration is that West Sussex has 'zero waste to landfill' by 2031 <i>(i.e. Scenario 4)</i>; 'zero waste to landfill' is defined in this Plan as the disposal to land (via landfill or landraise) of less than 3% of the waste arising in the County. This means that there needs to be sufficient recovery capacity to treat the residual non-inert waste arising in West Sussex that would be sent for disposal to land either within the County or potentially elsewhere. To achieve this aspiration, additional facilities providing for a total of 0.08 <i>0.16mtpa</i> of treatment capacity would be required. It is assumed, for the purposes of this Plan, that this additional capacity would be provided by an 'energy from waste' plant(s) that would mainly deal with rejects from recycling and recovery treatment; it should, however, be noted that the Authorities are not planning the delivery of such a facility or seeking to prescribe to the private sector that such a facility must be built. If higher growth rates occur <i>are achieved</i>, an increase in additional capacity of 0.01mtpa <i>0.18mtpa</i> would be required <i>to achieve zero waste to landfill</i>.</p> <p>2.11 Implications for the Local Plan</p> <p>2.11.1 <i>In seeking to make adequate provision for the management of all 'controlled wastes' arising in West Sussex, the Authorities need to plan for the delivery of an increase in built waste management capacity so that the objectives of 'net self-sufficiency' and 'zero waste to landfill by 2031' can be met.</i> Table 3 summarises the potential additional capacity required for transfer, recycling and recovery using the maximum shortfalls for each under Scenario 3 (see Section 2.10). As a contingency, the figures do not assume that any 'headroom' at the Ford MRF and the Brookhurst Wood MBT which have been constructed under the County Council's waste management contracts, will be available for non-municipal waste <i>(even though the latter has been included within Scenarios 1-3)</i>.</p>

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			<p>As a further contingency, the table factors in the additional need if there is higher growth than currently anticipated (even though the evidence suggests this is unlikely to occur in the plan period). The table also identifies the potential landtake that may be required to deliver the additional capacity (based on information in "Planning for Waste Management Facilities – A Research Study, ODPM, August 2004" - CDG38).</p> <p>2.11.2 Based on the information in Table 3, the Authorities need to plan for a total increase in <i>built</i> waste management capacity of <i>0.68mtpa</i> 0.67mtpa to 2031 (allowing for a degree of contingency) <i>to enable the objectives of 'net self-sufficiency' and 'zero waste to landfill' to be achieved</i>. Therefore, the strategic waste sites allocated in this Plan (see Policy W10) must be both distributed in accordance with the spatial strategy (see section 7.2) and be suitable to accommodate facilities that make a substantial contribution to delivering the required quantum of additional waste management capacity (see Section 7.4). It should be noted, however, that private sector businesses (and, therefore, commercial considerations) will determine whether facilities will actually be built and what types of technology will be used.</p> <p>2.11.3 As noted in paragraph 2.9.3, the County Council has been a net importer of waste, primarily for landfill. In keeping with the principle of net self-sufficiency, no provision is made in the figures in Table 3 to meet the needs of adjoining authorities or authorities elsewhere in the region or the UK, particularly the landfilling of waste.</p>
MM/003	Chapter 2. Table 3	Updated for clarity purposes and to take account of a refresh of data following Reg.19 representations	<i>See Appendix 1 for changes to Table 3.</i>

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		period	
MM/004	Policy W1 and supporting text	To ensure the objectively needs of the Plan area are set out within a Policy in the Plan	<p>6.2 Need for Self-Sufficiency in Waste Management Facilities</p> <p>6.2.1 The key strategic objectives are 3: To maintain net self-sufficiency in managing the transfer, recycling, and treatment of waste generated within West Sussex and 6: To only make provision for a declining amount of landfill over the plan period with 'zero waste to landfill' by 2031.</p> <p>6.2.2 With regard to capacity for the transfer, recycling, and treatment of waste, the strategy for achieving net self-sufficiency is to safeguard existing waste management capacity (see Policy W2), to allocate strategic sites for new facilities (see Policy W10) to meet shortfalls in capacity, and to enable other suitable sites, including for open windrow composting, to come forward.</p> <p>6.2.3 With regard to disposal to land (both landfill and landraise), the strategy is to plan for a declining amount of capacity over the plan period so that there is 'zero waste to landfill' by 2031. To this end, no provision is made to landfill non-inert and inert waste from outside West Sussex.</p> <div data-bbox="1016 979 2130 1377" style="border: 1px solid black; padding: 5px;"> <p>Policy W1: Self-Sufficiency in Need for Waste Management Facilities</p> <p>(a) Proposals for waste management facilities will be permitted where they are consistent with the objective of net self-sufficiency for the transfer, recycling, and treatment of the waste* arising in West Sussex.</p> <p>(b) Proposals for the disposal to land of waste arising in West Sussex will not be permitted unless they are consistent with the objective of 'zero waste to land fill' in West Sussex by 2031.</p> <p>(c) Proposals for the disposal to land of waste arising from outside West Sussex will not be permitted.</p> </div>

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			<p><i>(a) Proposals on unallocated sites for the storing, sorting, bulking and onward movement of waste will be permitted provided that they are needed to meet the shortfall in transfer capacity of 140,000 tonnes per annum. Proposals on unallocated sites to deliver capacity over and above this shortfall will be permitted where it can be demonstrated that there is a market need, consistent with the principle of net self-sufficiency.</i></p> <p><i>(b) Proposals on unallocated sites for facilities for the recycling and composting of non-inert waste will be permitted provided that they are needed to meet the shortfall in capacity of 270,000 tonnes per annum. Proposals on unallocated sites to deliver capacity over and above this shortfall will be permitted where it can be demonstrated that there is a market need, consistent with the principle of net self-sufficiency.</i></p> <p><i>(c) Proposals on unallocated sites for the recycling of inert waste or for open-windrow composting will be permitted where it can be demonstrated that there is a market need, consistent with the principle of net self-sufficiency.</i></p> <p><i>(d) Proposals on unallocated sites for built facilities for the recovery of non-inert waste will be permitted provided that they are needed to meet the shortfall in capacity of 270,000 tonnes per annum. Proposals on unallocated sites to deliver capacity over and above this shortfall will only be permitted where it can be demonstrated that it would reduce disposal to land of waste arising in West Sussex.</i></p> <p><i>(e) Proposals for non-inert waste landfilling operations on unallocated sites will not be permitted unless they are needed to meet the shortfall in management capacity of 605,000 tonnes over the plan period. Proposals on unallocated sites to deliver capacity over and above this shortfall, will not be permitted</i></p>

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			<p><i>unless there is a demonstrable need to dispose of non-inert waste arising within West Sussex, consistent with the principle of net self-sufficiency and the objective of 'zero waste to landfill'* in West Sussex by2031.</i></p> <p><i>(f) Proposals for inert waste landfilling operations will not be permitted unless it can be demonstrated that the waste cannot be managed through recovery operations and that there is a need to dispose of waste, consistent with the principle of net self- sufficiency and the objective of 'zero waste to landfill'* in West Sussex by 2031.</i></p> <p><i>* Defined as the disposal to land (via landfill or landraise) of less than 3% of all the waste arising in the County.</i></p> <p>6.2.4 The application of the principle of net self-sufficiency within this Plan, in support of social and economic growth, means having sufficient transfer, recycling, and treatment recovery, and disposal capacity to deal with manage the amount of waste generated within the County, with only minor cross border movements with adjoining authorities (see Section 2.86). Limited cross border waste movements would need to be justified on their merits. They may be acceptable if they would help to enable waste to be dealt with disposed-of in one of the nearest appropriate installations and would not prejudice the achievement of net self-sufficiency for West Sussex. Cross-border transfer may also be necessary in dealing with wastewater so that it can be managed at the nearest available facility.</p> <p>6.2.5 This principle of <i>net</i> self-sufficiency does not apply to hazardous and low-level radioactive waste. This is because the management of the relatively small amounts of such waste generated will usually take place at either specialist facilities for a particular industry or larger facilities to meet a national or regional need.</p> <p>6.2.6 The principle of self-sufficiency does not apply <i>With regard</i> to the disposal</p>

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			<p>of waste within West Sussex (both landfill and landraise), there is a limited supply of suitable waste disposal capacity within West Sussex and this is principally because of the lack of suitable sites within West Sussex and because The provision of too much capacity could act as a disincentive to the introduction of more sustainable forms of waste management. In addition, planning for a declining amount of landfill within West Sussex means that any overprovision of landfill capacity could 'draw in' waste from outside the County. The pursuit of the objective of 'zero waste to landfill' does mean, however, that some waste may travel outside the County for treatment or disposal. However, this will only occur if sufficient new recycling and treatment capacity does not come forward within the County and/or if insufficient landfill capacity is available within West Sussex during the plan period.</p> <p>6.2.7 In recent years, large amounts of waste from adjoining authorities and elsewhere has been imported for disposal. However, it is not considered appropriate to make provision for the continued disposal of waste from outside West Sussex at those historic levels because such imports would conflict with the objective of net self-sufficiency at the county level and the waste should either be recycled or treated within those areas. In addition, landfill sites within the County are limited by geological, environmental, and other constraints and existing sites need to be retained to deal with waste from West Sussex.</p> <p>6.2.7a There will be no requirement for applicants to demonstrate a quantitative or market need for a proposal on a site allocated in Policy W10; this is because they have been allocated to meet identified shortfalls in waste management capacity to deliver the objective of net self-sufficiency (see Section 2.10). As stated in paragraph 7.3.5, the Authorities will keep the allocated sites under review to ensure that they continue to be required to meet identified shortfalls; this will be reported in the AMR.</p> <p>6.2.7b On unallocated sites, applicants may be required to demonstrate that</p>

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			<p><i>there is a quantitative need for their facilities to address the identified shortfalls in transfer, recycling, or recovery capacity (to meet the objective of net self-sufficiency). The need to meet identified shortfalls will be monitored and assessed in the AMR, for example, to take account of any additions to, or losses of, permitted capacity for the different waste management types. In other cases, for example, where an identified shortfall has already been met on other sites, applicants will be required to demonstrate there is a market need for their proposal on an unallocated site to deal with waste arising in West Sussex or that it is necessary to move waste up the hierarchy away from landfill. In cases where there is no identified shortfall, proposals on unallocated sites should still be consistent with the net self-sufficiency and, where appropriate, the objective of zero waste to landfill.</i></p> <p><i>6.2.7c Where an applicant has to demonstrate the need for a proposal, the following information will be required as part of the planning application:</i></p> <ul style="list-style-type: none"> <i>• the nature and origin of the waste to be managed;</i> <i>• the existing or permitted operating capacity within the plan or catchment area (which can be drawn from the AMR and updated as necessary);</i> <i>• the levels of waste arising within the plan or catchment area; and</i> <i>• the potential shortfall in capacity or market need that the proposal seeks to address.</i> 		
MM/005	Policy W3 and supporting text	To confirm the priority for allocated sites over unallocated sites and to clarify how proposals on unallocated sites will be addressed.	<table border="1" data-bbox="1016 1209 2134 1391"> <thead> <tr> <th data-bbox="1016 1209 2134 1249">Policy W3: Location of Built Waste Management Facilities</th> </tr> </thead> <tbody> <tr> <td data-bbox="1016 1252 2134 1391">(a) Proposals for built waste management facilities, <i>on unallocated sites</i>, to enable the transfer, recycling, and <i>treatment recovery</i> of waste, will be permitted provided that <i>they are</i>:</td> </tr> </tbody> </table>	Policy W3: Location of Built Waste Management Facilities	(a) Proposals for built waste management facilities, <i>on unallocated sites</i>, to enable the transfer, recycling, and <i>treatment recovery</i> of waste, will be permitted provided that <i>they are</i>:
Policy W3: Location of Built Waste Management Facilities					
(a) Proposals for built waste management facilities, <i>on unallocated sites</i>, to enable the transfer, recycling, and <i>treatment recovery</i> of waste, will be permitted provided that <i>they are</i>:					

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			<ul style="list-style-type: none"> (i) <i>it can be demonstrated that they cannot be delivered on permitted sites for built waste management facilities or on the sites allocated for that purpose in Policy W10; and</i> (ii) <i>they are</i> located in the Areas of Search along the coast and in the north and east of the County as identified on the Key Diagram; or (iii) outside the Areas of Search identified on the Key Diagram, they are only small-scale facilities to serve a local need. <p>(b) Proposals for facilities that accord with part (a) must:</p> <ul style="list-style-type: none"> (i) be located on permitted or allocated sites for built waste management uses; or (i) be located within built-up areas, or on suitable previously-developed land outside built-up areas; or (ii) be located on a site in agricultural use where it involves the treatment of waste for reuse within that unit; or (iii) <i>only</i> be located on a greenfield site, only if it can be demonstrated that no suitable alternative sites are available; and (iv) where transportation by rail or water is not practicable or viable, be well-related to the Lorry Route Network; large-scale facilities must have good access to the Strategic Lorry Route. <p>(c) Proposals for new facilities within the boundaries of existing waste management sites <i>to enable the transfer, recycling and recovery of waste</i>, will be permitted unless:</p> <ul style="list-style-type: none"> (i) the current use is temporary and the site is unsuitable for continued waste use; or

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			<div data-bbox="1016 328 2141 464" style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p style="text-align: center;">(ii) continued use of the site for waste management purposes would be unacceptable in terms of its impact on local communities and/or the environment.</p> </div> <p>6.4.4 Most new built waste management facilities need to be well-located in terms of the origins of the waste, that is, mainly the residential properties and businesses in the main urban areas. Facilities should also be well- located in terms of the onward destination of materials including for processing, further treatment, or disposal.</p> <p>6.4.5 For some facilities, particularly those to meet local needs, a number of sites across the County close to the main towns may be required. For more strategic facilities, that is, those meeting a county or sub-county need, only a single location may be appropriate. Strategic facilities are likely to need larger sites (2/3 hectares or more) and may need to be co-located with other facilities as this will reduce the need to transport waste, reduce the land-take and, ultimately, reduce the overall impact of developing the facilities.</p> <p><i>6.4.5a New proposals, particularly for strategic facilities, should be located on sites with unimplemented planning permissions for built waste management uses or on the sites allocated for built facilities in Policy W10. Where an applicant is proposing the use of an alternative site, they will be required to demonstrate that permitted or allocated sites cannot be used for the following or some other material reason:</i></p> <ul style="list-style-type: none"> <i>• they are not suitable for the proposed use (for example, they are too small or there would be unacceptable impacts);</i> <i>• they are located outside the catchment area for the proposed use;</i>

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			<ul style="list-style-type: none"> • <i>they unavailable for commercial reasons; or</i> • <i>the proposal needs to be co-located with an existing facility.</i> <p>6.4.6 If facilities cannot be located within existing built up areas, broad Areas of Search close to the main urban areas along the coast and in the north and east of the County (illustrated on the Key Diagram) have been identified as being suitable in principle of the location of new facilities outside built-up areas.</p> <p>6.4.7 Elsewhere, given the general constraints in rural areas, new small-scale built waste management facilities should only be those that are required to meet local needs. Facilities in rural areas should be located within the main settlements, preferably those on the Lorry Route Network, although small sites adjoining the villages may be acceptable if no suitable sites are available within their built-up areas.</p> <p>6.4.8 Although 'small-scale' is generally defined within this Plan as a facility with a capacity of no more than 50,000tpa, the acceptability of any proposal will depend upon the specific nature of the proposal and its impact on the site and the surrounding area rather than on its capacity. In many cases, therefore, only much smaller facilities (c.10-20,000tpa) are likely to be acceptable, particularly within the rural parts of the County. Within protected landscapes, particular attention will be paid to the impact of proposals and larger 'small-scale' facilities, e.g. of 40,000tpa, that may be acceptable elsewhere within the County, may not pass the tests in Policy W13.</p> <p>6.4.9 The definition of 'local' as used within this Plan will depend upon the type of facility and its catchment area. Therefore, even if the justification for a proposed facility is that it is required to serve local social and/or economic needs, this does not necessarily mean that it will be acceptable in any location as much will depend upon the specific nature of the proposal and its impact.</p> <p>6.4.10 Proposals for new built waste management facilities within or close to</p>

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			<p>the South Downs National Park and the Areas of Outstanding Natural Beauty will also be judged against the criteria in Policy W13.</p> <p>6.4.11 Existing waste sites are suitable, in principle, for the intensification of existing uses and the co-location of new built waste facilities. There may also be instances where land adjoining existing waste sites could be satisfactorily incorporated as part of proposals. In some cases, however, it may not be appropriate to locate new built facilities at sites that are operating under a temporary consent or at sites in the countryside. There may also be cases where the existing waste use is inappropriately located and should not be perpetuated. <i>Any proposal for an extension beyond the boundary of an existing site will be treated as a new site.</i></p> <p>6.4.12 Industrial areas, especially those containing heavy or specialised uses, are suitable locations for waste management facilities as waste sorting, transfer, recycling, and treatment operations are similar to industrial processes and they require similar buildings and infrastructure.</p> <p>6.4.13 Although priority should be given to sites within built-up areas, previously- developed land outside built-up areas may be acceptable, provided that it is not of high environmental value. However, suitable sites (outside existing waste sites or industrial areas) will also be limited by the potential effects of operations on residential, commercial, recreational and other uses and on the environment. There will, however, be scope for some types of facility, especially those dealing with waste generated in the locality (for example, recycling points and facilities within new developments).</p> <p>6.4.14 The location of new facilities, e.g. for anaerobic digestion, may be appropriate in the countryside for the treatment of agricultural waste and other materials, such as food waste, where this will result in the production of digestate for use as a fertilizer within that agricultural unit. The recovery of energy from gas produced as a by-product of such processes should be fully exploited.</p>

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			<p>6.4.15 Greenfield sites should only be used if no other suitable sites are available. Applicants will be required to demonstrate that all alternatives have been fully investigated, appropriate to the scale and nature of the development. This includes consideration of existing, permitted, or allocated sites for built waste management uses; other sites within built-up areas; and previously- developed land outside built-up areas.</p> <p>6.4.16 Although any realistic opportunities for the transport of waste by rail or water should be utilised, new built waste management sites should be 'well-related' to the Lorry Route Network, that is, located as close as possible to the LRN so that the use of local roads is minimised. Strategic facilities meeting more than local needs must be located close to the Strategic Lorry Route given that the waste may need to be transported within and across the County.</p>
MM/006	Policy W8 and supporting text	To clarify the approach to proposals for waste disposal activities in the Plan area	<p>6.9 Disposal of Non-Inert Waste to Land</p> <p>6.9.1 The key strategic objectives are 2: <i>To enable the progressive movement of non-municipal waste up the waste hierarchy away from landfill</i>, 6: <i>To only make provision for a declining amount of landfill over the plan period with 'zero waste to landfill' by 2031</i>, and 11: <i>To conserve and safeguard the County's important mineral resources.</i></p> <p>6.9.2 In accordance with the aspiration to become a 'zero waste to landfill' county by 2031, the strategy for non-inert landfill (including landraise) is to meet identified need through existing landfill operations and <i>in addition for non- inert waste</i> through the allocation of an extension to the Brookhurst Wood site under Policy W10. No new non-inert <i>or inert</i> landfill sites have been allocated and criteria will be used to assess any proposals for new sites that come forward.</p> <p>Policy W8: Disposal of Non-Inert Waste to Land</p>

Modification ID reference	Policy Paragraph/Number/Table Number	Reason for change	Suggested change
			<p>(a) Proposals for the disposal of non-inert waste at unallocated sites will not be permitted unless it can be demonstrated that the waste cannot be managed at permitted sites or at the extension to the Brookhurst Wood landfill site allocated in Policy W10.</p> <p>(ab) Proposals for the disposal of non-inert and inert waste to land (including the continuation in duration of, or the physical extension of, existing operations) will not be permitted unless it can be demonstrated that:</p> <p>(i) there is a need for the development in accordance with Policy W1(b);</p> <p>(i) the waste to be disposed of cannot practicably be reused, recycled or treated recovered;</p> <p>(ii) there would be no unacceptable adverse impact on natural resources, particularly on groundwater quality, and other environmental constraints;</p> <p>(iii) they would accord with Policy W13 (Protected Landscapes);</p> <p>(iv) any important mineral reserves would not be sterilised;</p> <p>(v) appropriate measures are included to recover energy from landfill gas; and</p> <p>(vi) restoration of the site to a high quality standard would take place in accordance with Policy W20.</p> <p>(bc) Any proposals for new non-inert landfill sites (including for landraise) must accord with parts (a) and (b) and will not be permitted unless it can be demonstrated that:</p> <p>(i) they are only required for the disposal of waste arising in West Sussex following recycling and treatment recovery;</p>

Modification ID reference	Policy Paragraph/Number/Table Number	Reason for change	Suggested change
			<div data-bbox="1016 327 2136 459" style="border: 1px solid black; padding: 5px; text-align: center;"> <p>(ii) there are no opportunities to extend the operation of existing sites either within West Sussex or elsewhere.</p> </div> <p>6.9.3 Landfill (including land-raising) is the least preferred form of waste management in terms of the waste hierarchy. In order to achieve sustainable waste management, non-inert waste should not be landfilled unless adequate steps have been taken to remove recyclable and biodegradable elements from the waste and when the waste cannot reasonably be subject to further treatment. Policy W8 covers both the disposal of <i>inert and</i> non-hazardous waste, and hazardous waste <i>and low activity low-level radioactive waste</i>; proposals for the latter will also be judged against Policy W7. Hazardous waste can only go to hazardous landfill sites, whereas stable non-reactive hazardous waste (SNHRW) can be disposed of in dedicated cells at 'non-hazardous' landfill sites.</p> <p>6.9.4 There will be a declining amount of non-inert landfill capacity in the County as existing sites are used up and no new sites are brought into use; the evidence suggests that there is little or no demand from the waste industry for new sites. The completion of existing sites may take longer to achieve than currently anticipated as input rates slow down as recycling and treatment rates increase. In the medium and longer term, as new recycling and treatment facilities become available, disposal to land will only be needed for the residues of treatment, such as bottom ash from energy from waste plants (unless alternatives uses can be found for those materials).</p> <p><i>6.9.4a During this period of transition, an extension to the Brookhurst Wood Landfill Site is allocated in Policy W10 to provide additional disposal capacity. Any applicant proposing disposal on any other site will be required to demonstrate that the allocated site cannot be used for some</i></p>

Modification ID reference	Policy Paragraph/Number/Table Number	Reason for change	Suggested change
			<p><i>material reason/s.</i></p> <p><i>6.9.4b Previous allocations for inert landfill (i.e. disposal operations) in draft plans have not come forward and there appears to be little demand for landfill. This is because the current theoretical requirement for inert waste landfill capacity masks the real situation (see paragraph 2.10.12). In practice, very little inert waste is currently 'disposed' of to land and much inert material is 'recovered' so that the payment of landfill tax can be avoided. Uses can include landfill engineering/cover purposes at non-inert waste sites (an estimated 60,000 tonnes in 2010), the restoration of mineral workings, agricultural improvements, and other engineering projects (such as, golf courses and noise attenuation bunds). Proposals for recovery operations will be judged against Policy W9.</i></p> <p>6.9.5 Particular attention will need to be paid to the protection of natural resources and <i>any potential impacts on the wider environment. other environmental constraints.</i> For example, landfill is a major potential hazard to groundwater quality and non-inert landfill must not be located in Source Protection Zone 1. In other locations, it will also be unacceptable, for example, on or in a major or principal aquifer, within Source Protection Zones II or III, and elsewhere where active long-term site management will be essential to prevent long-term groundwater pollution.</p> <p>6.9.6 Landfilling operations at existing mineral sites, such as clay pits, should not prejudice the winning of the important mineral reserves. In such cases, the applicant will need to demonstrate that there are no conflicts between the mineral workings and landfilling operations and that both can take place in tandem.</p> <p>6.9.7 Non-inert landfill sites will require measures to manage landfill gas, generated by the waste, which can continue over long periods. Unless</p>

Modification ID reference	Policy Paragraph/Number/Table Number	Reason for change	Suggested change
			<p>there are sound reasons to the contrary, these measures should provide for energy recovery from the gas.</p> <p>6.9.8 The restoration of the site should be part of a comprehensive package of improvements or enhancements for the site following the completion of operations (see Policy W20).</p> <p>6.9.9 Applicants for non-inert landfill should be able to demonstrate that the proposed facility will not prejudice the movement of waste up the hierarchy; the provision of too much landfill capacity could act as a disincentive to the introduction of more sustainable forms of waste management.</p> <p><i>6.9.9a Proposals to extend the end date for the completion of permitted operations would, in principle, be considered favourably unless there have been material changes since the grant of the extant planning permission which suggest that there should be no continuation of landfilling at the site.</i></p> <p>6.9.10 Where there is a demonstrable need for new non-inert landfill capacity, provided that all other requirements can be met, the expansion of existing landfill operations is likely to be more preferable than the introduction of a new facility, as the former will enable use to be made of existing infrastructure. In such cases, the cumulative impact on the environment and/or local communities of extending landfilling operations will need to be addressed in accordance with Policy W21.</p>
MM/007	Policy W9 and supporting text	To clarify the approach to proposals for waste recovery activities involving the deposition of inert	<p>6.10 Recovery Operations involving the Depositing of Inert Waste to Land</p> <p>6.10.1 The key strategic objectives are 2: <i>To enable the progressive movement of non-municipal waste up the waste hierarchy away from landfill</i> and 6: <i>To only make provision for a declining amount of landfill over the plan</i></p>

Modification ID reference	Policy Paragraph/Number/Table Number	Reason for change	Suggested change
		waste in the Plan area	<p><i>period with 'zero waste to landfill' by 2031, and 11: To conserve and safeguard the County's important mineral resources.</i></p> <p>6.10.2 In accordance with the aspiration to become a 'zero waste to landfill' county by 2031, the strategy is to encourage the recycling of inert waste (Policy W4) and to use criteria to assess any proposals that come forward for <i>recovery operations involving</i> the depositing of inert waste material to land. No new inert landfill sites (including landraise) have been allocated.</p> <p>6.10.3 Previous allocations for inert landfill (i.e. disposal operations) in draft plans have not come forward and there appears to be little demand for landfill. This is because the current theoretical requirement for inert waste landfill capacity masks the real situation (see paragraph 2.10.12). In practice, very little inert waste is currently 'disposed' of to land and much inert material is 'recovered' so that the payment of landfill tax can be avoided. Uses can include landfill engineering/cover purposes at non-inert waste sites (an estimated 60,000 tonnes in 2010), the restoration of mineral workings, agricultural improvements, and other engineering projects (such as, golf courses and noise attenuation bunds).</p> <div style="border: 1px solid black; padding: 5px;"> <p>Policy W9: <i>Recovery Operations involving the</i> Depositing of Inert Waste to Land</p> <p><i>Proposals for recovery operations involving the depositing of inert waste to land (including for the continuation in duration or physical extension of, existing operations) will not be permitted unless provided that:</i></p> <p>(a) there is a need for the development in accordance with Policy W1;</p> <p>(ba) the proposal results in clear benefits for the site and,</p> </div>

Modification ID reference	Policy Paragraph/Number/Table Number	Reason for change	Suggested change
			<p>where possible, the wider area;</p> <p>(eb) the material to be used is only residual waste following recycling and/or treatment recovery <i>or it is waste that cannot be recycled or treated</i>;</p> <p>(dc) there is a genuine need to use the waste material as a substitute for a non-waste material that would otherwise have been used <i>to be used</i>;</p> <p>(ed) the material to be reused is suitable for its intended use;</p> <p>(fe) the amount of waste material to be used is no more than is necessary to deliver the benefits identified under (ba) <i>(ba)</i>;</p> <p>(gf) there would be no adverse impact on natural resources and other environmental constraints;</p> <p>(hg) <i>the proposal accords with Policy W13 (Protected Landscapes);</i> there would be no adverse impact on protected landscapes in accordance with Policy W13;</p> <p>(ih) any important mineral reserves would not be sterilised; and</p> <p>(ji) restoration of the site to a high quality standard would take place in accordance with Policy W20.</p> <p>6.10.4 In considering a proposal for the depositing of inert waste to land, an important consideration is whether the proposal amounts to a 'recovery' operation or to a 'disposal' operation. Given that recovery is higher up the waste hierarchy, genuine proposals for the beneficial reuse of inert material would, in principle, be considered favourably. <i>Policy W9 sets out the criteria that will be used to assess proposals for</i></p>

Modification ID reference	Policy Paragraph/Number/Table Number	Reason for change	Suggested change
			<p><i>the depositing of inert waste to land. Accordingly, proposals for the depositing of inert waste to land will be judged against criterion (a)-(i) in Policy W9 to determine whether they are recovery operations. If a proposal is determined by the Authorities not to be a genuine recovery operation, it will be assessed as a disposal operation against Policy W8.</i></p> <p>6.10.5 There should be a clear benefit or benefits from the proposed development. This should be a benefit to the site itself, for example, <i>the use of residual inert material associated with the restoration of an active or dormant mineral working the restoration of a former mineral working to agriculture</i> or an engineering operation for the provision of a new leisure facility. However, given the likely disturbance to local communities and the local environment, for example, due to the movement of HGVs, there should be benefits for the wider area, for example, through environmental improvement or the creation of new public rights of way.</p> <p>6.10.6 There should be a genuine need to use the proposed waste material e.g. bunds for visual screening; that is, it should be a suitable alternative for non-waste materials that could meet that need. In addition, the waste material to be reused should have the right properties for the intended purpose and it should only be the minimum amount required to deliver the intended outcome of the project or proposal.</p> <p>6.10.7 Particular attention will need to be paid to the protection of natural resources and <i>any potential impacts on the wider environment, other environmental constraints</i> such as the potential risk to groundwater quality. Proposals within or close to the South Downs National Park and the Areas of Outstanding Natural Beauty will also be judged against the criteria in Policy W13.</p>

Modification ID reference	Policy Paragraph/Number/Table Number	Reason for change	Suggested change		
			<p>6.10.8 The depositing of inert material at existing mineral sites, should not prejudice the winning of any important mineral reserves that remain accessible. The restoration of the site should be part of a comprehensive package of improvements or enhancements for the site following the completion of operations (see Policy W20).</p> <p><i>6.10.9 Proposals to extend the end date for the completion of permitted operations would, in principle, be considered favourably unless there have been material changes since the grant of the extant planning permission which suggest that there should be no continuation of recovery operations at the site.</i></p>		
MM/008	Policy W10 and supporting text	To clarify the Plan in respect of the priority for the allocated sites to meet the identified shortfall	<table border="1" data-bbox="1014 804 2139 1390"> <thead> <tr> <th data-bbox="1023 810 2130 842">Policy W10: Strategic Waste Site Allocations</th> </tr> </thead> <tbody> <tr> <td data-bbox="1023 845 2130 1383"> <p>(a) The following sites are allocated for waste management facilities and to meet identified shortfalls in transfer, recycling, and recovery capacity. Accordingly, they are acceptable, in principle, for the development of proposals waste management facilities for the transfer, recycling, and/or treatment recovery of waste (including the recycling of inert waste):</p> <ul style="list-style-type: none"> • Site north of Wastewater Treatment Works, Ford (Inset Policy Map 1); • Hobbs Barn, near Climping (Inset Policy Map 2); • Fuel Depot, Bognor Road, Chichester (Inset Policy Map 3); • Brookhurst Wood, near Horsham (Inset Policy Map 4); and • Land west of Wastewater Treatment Works, Goddards Green (Inset Policy Map 5). <p>(b) The following site is allocated for to meet an identified shortfall in non-inert landfill capacity. Accordingly, it and is acceptable,</p> </td> </tr> </tbody> </table>	Policy W10: Strategic Waste Site Allocations	<p>(a) The following sites are allocated for waste management facilities and to meet identified shortfalls in transfer, recycling, and recovery capacity. Accordingly, they are acceptable, in principle, for the development of proposals waste management facilities for the transfer, recycling, and/or treatment recovery of waste (including the recycling of inert waste):</p> <ul style="list-style-type: none"> • Site north of Wastewater Treatment Works, Ford (Inset Policy Map 1); • Hobbs Barn, near Climping (Inset Policy Map 2); • Fuel Depot, Bognor Road, Chichester (Inset Policy Map 3); • Brookhurst Wood, near Horsham (Inset Policy Map 4); and • Land west of Wastewater Treatment Works, Goddards Green (Inset Policy Map 5). <p>(b) The following site is allocated for to meet an identified shortfall in non-inert landfill capacity. Accordingly, it and is acceptable,</p>
Policy W10: Strategic Waste Site Allocations					
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Modification ID reference	Policy Paragraph/Number/Table Number	Reason for change	Suggested change
			<p>in principle, for that purpose:</p> <ul style="list-style-type: none"> • Extension to Brookhurst Wood Landfill Site, near Horsham (Inset-Policy Map 4). <p>(c) The development of a site allocated under (a)-(b) must take place in accordance with the policies of this Plan and satisfactorily address the 'development principles' for that site identified in the supporting text to this policy.</p> <p>(d) The sites allocated under (a)-(b) will be safeguarded from any development either on or adjoining the sites that would prevent or prejudice their development (in whole or in part) for the allocated waste management use or uses.</p> <p>7.3.3 The focus for the selection of new built waste management sites has been on the land-use implications of potential uses rather than on particular types of facilities or technologies. Technologies will change over time and it is important that flexibility is built into the Plan. Therefore, the sites allocated under Policy W10(a) can be used for general industrial type buildings that could be used for different uses (see Section 2.7). Wherever possible, proposals for facilities such as thermal treatment plants and for anaerobic digestion should come forward as part of schemes that combine the generation and distribution of heat and power.</p> <p>7.3.4 The sites can also be used for inert waste recycling, that is, the processing of CDEW to produce secondary aggregates or soils. This will usually take place in the open, although some operations may be enclosed within buildings.</p> <p><i>7.3.4a As stated in paragraph 6.2.7a, there will be no requirement for applicants to demonstrate a quantitative or market need for a proposal on a site</i></p>

Modification ID reference	Policy Paragraph/Number/Table Number	Reason for change	Suggested change
			<p><i>allocated in Policy W10. This is because they are required to meet identified shortfall in waste management capacity to deliver the objective of net self- sufficiency.</i></p> <p>7.3.5 The sites in Policy W10 will be safeguarded for the allocated waste management use; for mixed-use sites, the development of complementary non-waste uses on the site should not prejudice the delivery of waste uses on part of the site. The Authorities will keep the allocated sites under review to take account of changing circumstances; any formal changes to Policy W10 will be made through a review of the Plan. <i>Prior to the Plan being reviewed, there may be circumstances where the safeguarding of a site (in whole or in part) for waste management uses is no longer necessary or appropriate. For example, additional capacity may be permitted on unallocated sites and there is no longer a need for the allocation or</i> an alternative scheme for the site may come forward that has wider benefits that clearly outweigh the retention of the allocation for waste uses.</p>
MM/009	Paragraph 7.3.11	Change to size of allocation at the Fuel Depot, Chichester	7.3.11 Fuel Depot, Bognor Road, Chichester (<i>Inset Policy</i> Map 3): A former fuel depot (approximately 4.8 hectares) outside the defined built-up area. The site includes a number of large earthwork mounds which cover underground bunkers which may have national archaeological significance due to their rarity. The site has the capacity to deliver a single waste management facility (c.50,000tpa on <i>1.0 2.0-2.4</i> hectares) as part of the comprehensive redevelopment of the site involving complementary non-waste uses. The actual waste management capacity achieved on the site would depend upon the specific type of facility and the chosen technology.
MM/010	Paragraphs 7.3.15 – 7.3.16	Development Principles for Land	7.3.15 Land west of Wastewater Treatment Works, Goddards Green (<i>Inset Policy</i> Map 5): A greenfield site (approximately 5.0 hectares) outside the

Modification ID reference	Policy Paragraph/Number/Table Number	Reason for change	Suggested change
		West of Waste Water Treatment Works, Goddards Green	<p>defined built-up area. In theory, it has the physical capacity to deliver up to 200,000tpa possibly in a single facility or in a number of smaller facilities; however, the actual waste management capacity achieved on the site would depend upon the specific type of facility/facilities and the chosen technology or technologies.</p> <p>7.3.16 The development principles for the Goddards Green site are as follows:</p> <ul style="list-style-type: none"> • development of the site to be comprehensive; • development of the site to be compatible with <i>the development of the strategic allocation to the north and west of Burgess Hill</i> plans for the proposed 'Northern Arc' development including mitigation of any adverse impacts; • assessment of the visual impact <i>particularly in relation to height, scale and form of buildings</i> and mitigation required, including retention and reinforcement of hedgerows along the eastern and southern boundaries and landscaping (including screening bunds) along the western eastern and northern boundaries; • ecological survey (including impact on Site of Nature Conservation Importance) and possible mitigation required; • assessment of archaeological remains and possible mitigation required; • assessment of impacts on the water environment and possible mitigation required. Development must not result in a deterioration in water quality in the River Adur East or compromise its ability to achieve good status; • flood risk assessment and possible mitigation required; • assessment of impacts on the amenity of users of public rights of way and possible mitigation and enhanced required; • assessment of impact (e.g. traffic, noise, odour) on the amenity of dwellings and possible mitigation required; • the cumulative impacts of traffic, noise, and odour on the environment • and local communities to be satisfactorily addressed and mitigated

Modification ID reference	Policy Paragraph/Number/Table Number	Reason for change	Suggested change
			<p>as required, taking into account all existing, permitted, allocated, or proposed development within the wider area;</p> <ul style="list-style-type: none"> • assessment of impact of additional HGV movements on highway capacity and road safety, including on the A23/A2300 junction and possible mitigation required; • a routing agreement is required to ensure vehicles use the strategic • lorry route, including avoiding use of Cuckfield Road and movements through Burgess Hill; and • easement of between 6 and 8 metres required to ensure future access to the sewer along southern edge of site.
MM/011	Paragraph 7.3.17	Removal of Decoy Farm, Worthing from the Plan- as the site is not allocated.	<p>7.3.17 Decoy Farm, Worthing: Although it is not a specific site allocation in this Plan, a waste management facility could be accommodated at Decoy Farm in Worthing. It is a former landfill site which is allocated as 'Area of Change 12' in the Worthing Core Strategy for mixed-use employment that could include Classes B1 (business), B2 (general industrial), and B8 (storage and distribution) uses. The site includes the former Household Waste Recycling Site (HWRS) and the replacement HWRS has been built in the south eastern corner. Decoy Farm potentially has the capacity to deliver a single waste management facility (c.50,000tpa on two hectares) as part of the redevelopment of the site involving complementary non-waste uses, including the potential relocation of uses from Shoreham Harbour. The actual waste management capacity achieved on the site would depend upon the specific type of facility and the chosen technology. However, it would have to be demonstrated that a waste facility would not prejudice the redevelopment of the remainder of the site for mixed-use employment purposes and adhere to the development principles established for Decoy Farm in the Worthing Core Strategy.</p>
MM/013	Para 7.4.3 and Table 4	Update text in respect of latest waste data and Table 4 in respect of the latest	<p>7.4.3 Table 3 in Section 2.11 identifies that the Authorities need to plan for a total increase in waste management capacity of 0.67 0.68mtpa to 2031, allowing for a degree of contingency. The theoretical landtake required to deliver that quantum of development is about 16.9 19.9 hectares. It</p>

Modification ID reference	Policy Paragraph/Number/Table Number	Reason for change	Suggested change																																							
		information regarding the Fuel Depot, Chichester	<p>should, however, be noted that as the 'site size to capacity' ratio for different types of facility varies, the actual landtake that may be achieved would depend upon the uses and technologies that come forward.</p> <table border="1" data-bbox="1016 424 2119 1038"> <caption>Table 4: Potential Contribution of sites Allocated in Policy W10(a)</caption> <thead> <tr> <th rowspan="2">Allocated Sites</th> <th colspan="2">Minimum</th> <th colspan="2">Maximum</th> </tr> <tr> <th>mtpa*</th> <th>Area (ha)</th> <th>Mtpa*</th> <th>Area (ha)</th> </tr> </thead> <tbody> <tr> <td>Site north of WWTW, Ford</td> <td>0.25</td> <td>6.0</td> <td>0.25</td> <td>6.0</td> </tr> <tr> <td>Hobbs Barn, near Climping</td> <td>0.05</td> <td>2.1</td> <td>0.05</td> <td>2.1</td> </tr> <tr> <td>Fuel Depot, Chichester</td> <td>0.05</td> <td>2.01.0</td> <td>0.05</td> <td>2.41.0</td> </tr> <tr> <td>Brookhurst Wood, nr Horsham</td> <td>0.30</td> <td>6.5</td> <td>0.30</td> <td>6.5</td> </tr> <tr> <td>Land west of WWTW, Goddards Green</td> <td>0.05</td> <td>2.0</td> <td>0.20</td> <td>5.0</td> </tr> <tr> <td>Total</td> <td>0.70</td> <td>18.617.6</td> <td>0.85</td> <td>22.020.6</td> </tr> </tbody> </table> <p>* Theoretical figures only - the actual waste management capacity achieved on the site would depend upon the specific type of facility/facilities and the chosen technology/technologies.</p>	Allocated Sites	Minimum		Maximum		mtpa*	Area (ha)	Mtpa*	Area (ha)	Site north of WWTW, Ford	0.25	6.0	0.25	6.0	Hobbs Barn, near Climping	0.05	2.1	0.05	2.1	Fuel Depot, Chichester	0.05	2.0 1.0	0.05	2.4 1.0	Brookhurst Wood, nr Horsham	0.30	6.5	0.30	6.5	Land west of WWTW, Goddards Green	0.05	2.0	0.20	5.0	Total	0.70	18.617.6	0.85	22.020.6
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MM/014	Paragraphs 7.4.3, 7.4.5, 7.4.6	Update submitted Plan for adoption in respect of most up to	7.4.3 Table 3 in Section 2.11 identifies that the Authorities need to plan for a total increase in waste management capacity of 0.67 0.68mtpa to 2031, allowing for a degree of contingency. The theoretical landtake																																							

Modification ID reference	Policy Paragraph/Number/Table Number	Reason for change	Suggested change		
		date waste data.	<p>required to deliver that quantum of development is about 16.919.9 hectares. It should, however, be noted that as the 'site size to capacity' ratio for different types of facility varies, the actual landtake that may be achieved would depend upon the uses and technologies that come forward.</p> <p>7.4.5 Table 4 shows that the sites allocated in Policy W10(a) could potentially deliver between 0.70 and 0.85mtpa of additional <i>built</i> waste management capacity for transfer, recycling and treatment on between 18.617.6 and 22.020.6 hectares of land. As a minimum, the allocated sites would be able to meet the theoretical capacity shortfall of 0.68mtpa 0.67mtpa, without any reliance on unallocated sites.</p> <p>7.4.6 With regard to the theoretical need for up to 0.61mt 1.15mt of new non- inert landfill capacity (see paragraph 2.10.12), the proposed extension to the Brookhurst Wood Landfill Site would <i>meet the strategic needs of the Plan area</i> make a substantial contribution (c.0.86mt) in the medium-term (i.e. post 2015).</p>		
MM/015	Policy W13	To ensure consistency with other WLP policies and NPPF as result of discussions during hearing sessions	<table border="1" data-bbox="1016 954 2119 1369"> <thead> <tr> <th data-bbox="1016 954 2119 991">Policy W13: Protected Landscapes</th> </tr> </thead> <tbody> <tr> <td data-bbox="1016 994 2119 1369"> <p>(a) Proposals for waste development within protected landscapes (the South Downs National Park, the Chichester Harbour Area of Outstanding Natural Beauty (AONB), and the High Weald AONB) will not be permitted unless:</p> <ul style="list-style-type: none"> (i) the site is allocated for that purpose in an adopted plan; or (ii) the proposal is for a small-scale facility to meet local needs that can be accommodated without undermining the objectives of the designation; or (iii) the proposal is for major* waste development that accords with part (c) of this Policy. </td> </tr> </tbody> </table>	Policy W13: Protected Landscapes	<p>(a) Proposals for waste development within protected landscapes (the South Downs National Park, the Chichester Harbour Area of Outstanding Natural Beauty (AONB), and the High Weald AONB) will not be permitted unless:</p> <ul style="list-style-type: none"> (i) the site is allocated for that purpose in an adopted plan; or (ii) the proposal is for a small-scale facility to meet local needs that can be accommodated without undermining the objectives of the designation; or (iii) the proposal is for major* waste development that accords with part (c) of this Policy.
Policy W13: Protected Landscapes					
<p>(a) Proposals for waste development within protected landscapes (the South Downs National Park, the Chichester Harbour Area of Outstanding Natural Beauty (AONB), and the High Weald AONB) will not be permitted unless:</p> <ul style="list-style-type: none"> (i) the site is allocated for that purpose in an adopted plan; or (ii) the proposal is for a small-scale facility to meet local needs that can be accommodated without undermining the objectives of the designation; or (iii) the proposal is for major* waste development that accords with part (c) of this Policy. 					

Modification ID reference	Policy Paragraph/Number/Table Number	Reason for change	Suggested change
			<p>(b) Proposals for waste development located outside protected landscapes <i>will be permitted provided that they do not but which would</i> undermine the objectives of the designation, will not be permitted.</p> <p>(c) Proposals for major* waste development within protected landscapes will not be permitted unless:</p> <ul style="list-style-type: none"> (i) there is an overriding need for the development within the designated area; and (ii) the need cannot be met in some other way or met outside the designated area; and (iii) any adverse impacts on the environment, landscape, and recreational opportunities can be satisfactorily mitigated. <p>(d) Proposals involving the use of residual inert material associated with the restoration of an active or dormant mineral working will not be permitted unless:</p> <ul style="list-style-type: none"> (i) they accord with part (c) of this Policy and Policy W9 (ii) any temporary harm as a result of the operations would be outweighed by the long term benefits of the proposed after use. <p>* In the case of waste proposals, all applications are defined by the Town and Country Planning (Development Management Procedure) Order 2010 as 'major'. However, for the purpose of this policy, major waste development is development that, by reason of its scale, character or nature, has the potential to have a serious adverse impact on the natural beauty, wildlife, cultural heritage and recreational opportunities provided by the South Downs National Park or the natural beauty, distinctive character, and remote and tranquil nature of the Areas of Outstanding Natural Beauty (AONB). The potential for significant impacts on the National Park or the AONB will be dependent on the individual characteristics of each case.</p>

Modification ID reference	Policy Paragraph/Number/Table Number	Reason for change	Suggested change		
MM/016	Para 8.4.6	Removal of reference to Shoreham Cement Works- as the site is not allocated in the Plan.	<p>8.4.6 Shoreham Cement Works, near Upper Beeding- Shoreham Cement Works is a major brownfield site within the South Downs National Park. The potential of the site to accommodate some form of waste management use and the economic and regeneration benefits that could arise from this, will be addressed by the SDNPA in a separate policy in their Local Plan for the National Park. Any development of the site, including for waste uses, would need to deliver environmental and landscape improvements and satisfactorily address transport and other constraints on the site.</p>		
MM/017	Policy W18	To clarify the Plan	<table border="1" data-bbox="1016 619 2134 1383"> <thead> <tr> <th data-bbox="1028 627 2123 655">Policy W18 Transport</th> </tr> </thead> <tbody> <tr> <td data-bbox="1028 660 2123 1375"> <p>Proposals for waste development will be permitted provided that:</p> <p>(a) where practicable and viable, the proposal makes use of rail or water for the transportation of materials to and from the site;</p> <p>(b) transport links are adequate to serve the development or can be improved to an appropriate standard without an unacceptable impact on amenity, character, or the environment; and</p> <p>(c) where the need for road transport can be demonstrated:</p> <p>(i) materials are capable of being transported using the Lorry Route Network with minimal use of local roads, unless special justification can be shown;</p> <p>(ii) vehicle movements associated with the development will not have an <i>unacceptable adverse</i> impact on the capacity of the highway network;</p> <p>(iii) there is safe and adequate means of access to the highway network and vehicle movements associated with the development will not have an adverse impact on the safety of all road users;</p> <p>(iv) satisfactory provision is made for vehicle turning and parking, manoeuvring, loading, and, where appropriate,</p> </td> </tr> </tbody> </table>	Policy W18 Transport	<p>Proposals for waste development will be permitted provided that:</p> <p>(a) where practicable and viable, the proposal makes use of rail or water for the transportation of materials to and from the site;</p> <p>(b) transport links are adequate to serve the development or can be improved to an appropriate standard without an unacceptable impact on amenity, character, or the environment; and</p> <p>(c) where the need for road transport can be demonstrated:</p> <p>(i) materials are capable of being transported using the Lorry Route Network with minimal use of local roads, unless special justification can be shown;</p> <p>(ii) vehicle movements associated with the development will not have an <i>unacceptable adverse</i> impact on the capacity of the highway network;</p> <p>(iii) there is safe and adequate means of access to the highway network and vehicle movements associated with the development will not have an adverse impact on the safety of all road users;</p> <p>(iv) satisfactory provision is made for vehicle turning and parking, manoeuvring, loading, and, where appropriate,</p>
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Modification ID reference	Policy Paragraph/Number/Table Number	Reason for change	Suggested change
			<p style="text-align: center;">wheel cleaning facilities; and</p> <p style="text-align: center;">(v) vehicle movements are minimised by the optimal use of the vehicle fleet</p>
MM/018	Policy W20	Policy W20- Restoration and Aftercare	<p>Policy W20: Restoration and Aftercare</p> <p>Proposals involving temporary waste development will be permitted provided that they are accompanied by comprehensive schemes that:</p> <ul style="list-style-type: none"> (a) make provision for high quality and practicable restoration, management, and aftercare; (b) are appropriate for their locations, maximising benefits taking into account local landscape character, the historic environment, biodiversity, and wider environmental objectives; (c) <i>where appropriate</i>, maximise public amenity benefits including appropriate re-instatement of, and where possible, improvement of public rights of way; (d) provide for the removal of all buildings, machinery and plant when they are no longer required in connection with the principal use; and (e) ensure that that land is restored at the earliest opportunity including, where appropriate, phased, or progressive restoration.

Table 3: Waste Management Capacity Shortfalls to 2031 and Implications for the Local Plan						
Types of Waste Management	Maximum capacity shortfalls*		Extra capacity required for higher growth		Total (including contingency)	
	mtpa	Area (ha)	mtpa	Area (ha)	mtpa	Area (ha)
Transfer	0.00	0.0	0.15	0.9	0.15	0.9
Recycling – MSW, C&I	0.07	2.5	0.10	3.5	0.17	6.0
Recycling – CDEW	0.00	0.0	0.06	1.0	0.06	1.0
Recovery**	0.24	7.0	0.05	2.0	0.29	9.0
Total	0.31	9.5	0.36	7.4	0.67	16.9

* Excludes any 'head room' available at the Ford MRF and Brookhurst Wood MBT facilities.
** To achieve 'Zero Waste to Landfill' aspiration.

Table 3: Built Waste Management Requirements to 2031 and Implications for the Local Plan						
Types of Waste Management	Capacity required for base case waste growth (a)		Additional capacity required for higher waste growth		Total additional capacity required to 2031	
	mtpa	Area (ha)	mtpa	Area (ha)	mtpa	Area (ha)
Transfer	0.00	0.0	0.14	0.9	0.14	0.9
Recycling – MSW, C&I	0.17	6.0	0.10	3.0	0.27	9.0
Recycling – CDEW	0.00	0.0	0.00	0.0	0.00	0.0
Recovery – C&I	0.07	3.0	0.02	1.0	0.09	4.0
Sub total (b)	0.24	9.0	0.26	4.9	0.50	13.9
Additional recovery (c)	0.16	5.0	0.02	1.0	0.18	6.0
Total (d)	0.40	14.0	0.28	5.9	0.68	19.9

(a) Scenario assumes no increase in recycling and excludes any 'headroom' available at the Ford MRF and Brookhurst Wood MBT facilities.
(b) There is still a theoretical need for additional non-inert landfill capacity to achieve net self-sufficiency.
(c) To achieve aspiration of 'zero waste to landfill' by 2031.
(d) To achieve net self-sufficiency and zero waste to landfill by 2031