Executive Summary

The West Sussex Waste Local Plan is being prepared by the County Council, in partnership with the South Downs National Park Authority, to cover the period to 2031. A draft Waste Local Plan was the subject of informal public consultation from 30 May to 13 August 2012 under Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012.

The results of the informal consultation (see Appendix A) and further technical work have informed the preparation of the Proposed Submission Draft of the Plan which is attached as Appendix B. The Plan sets out the background, the spatial context and the strategy and policy context within which it has been prepared, the vision and strategic objectives, the strategies and policies, the strategic waste site allocations (and their accompanying development principles), and implementation and monitoring information.

Following approval by both authorities, it will replace the policies in the approved West Sussex Waste Local Plan: Revised Deposit Draft (July 2004) and be used for development management purposes. The approved Proposed Submission Draft will then be subject to formal public consultation for nine weeks under Regulation 19 to allow representations to be made about (a) whether it has been prepared in accordance with all the legal requirements and (b) whether its contents are ‘sound’.

Representations made during the consultation period will help an independent Inspector consider at a public examination whether the Plan is legally compliant and ‘sound’. Following the examination, the Inspector will report whether the Plan is ‘sound’ and if it is, it will be adopted by both authorities when it will become part of the statutory ‘development plan’ for West Sussex.

The preparation of the Draft Plan has been the subject of scrutiny by an Environmental and Community Services Select Committee Task Force.

Recommendation

That the Committee considers the Proposed Submission Draft of the West Sussex Waste Local Plan (Appendix B) and informs the Deputy Leader about its views on its contents before it is submitted to County Council on 19 October 2012 for approval for formal public consultation purposes.
1. **Introduction**

1.1 On 13 May 2011, the County Council agreed to prepare separate Minerals and Waste Local Plans jointly with the South Downs National Park Authority (SDNPA) for the area of National Park within West Sussex. Priority was given to the preparation of a ‘Waste Local Plan’ with a separate ‘Minerals Local Plan’ to be prepared at a later date.

1.2 Following that decision, informal public consultation on preferred strategies and a shortlist of preferred strategic waste sites was undertaken until November 2011. Following consideration of the responses received and the results of further technical work, a draft Waste Local Plan was prepared which was the subject of informal public consultation from 30 May to 13 August 2012 under Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012.

1.3 The results of the informal consultation and further technical work have informed the preparation of the Proposed Submission Draft of the Plan. Following approval by the County Council (and the SDNPA), the draft Plan will be published for formal public consultation for nine weeks from 9 November 2012 under Regulation 19.

2. **Informal Consultation on the Draft Plan**

2.1 Following approval by the Deputy Leader (and the SDNPA) in May 2012, informal public consultation on a draft of the Plan was undertaken from 30 May to 13 August 2012. This involved discussion about the sites at the relevant county local committees (CLCs) as well as discussions with the district and borough councils, the parish councils, landowners, developers, and resident and community groups.

2.2 Appendix A to this report summarises the response from the CLCs/issues raised in the discussions at those meetings. It also summarises the 330 public responses received to the consultation, the key themes of which are as follows:

- strong overall support expressed for the Vision, although a number of issues were raised related to the specific objectives as briefly noted below, including comments highlighting the conflicts between some of the strategic objectives;
- various contrasting comments were received about the zero waste to landfill by 2031 strategic objective, including residents seeking this to be achieved sooner, others questioning the realism of this objective, and comments seeking clarification on the role of inert landfill as part of mineral site restoration;
- comments, largely from residents, about greater discussion being needed in the plan of waste prevention, this being at the top of the waste hierarchy, as well as coherent aims for handling each individual waste stream;
- contrasting comments from the waste industry and local residents about self-sufficiency in the handling of the county’s waste;
• comments highlighting the contradictions of objectives to make provision for waste handling as close as possible to the sources of waste, against the objective to protect the health and amenity of local residents, as well as contrasting comments about the need for and viability of transporting waste by rail and sea;

• many comments were received from members of the public opposed to waste site provision in their area. All of the shortlisted waste sites received comments, with the site at Goddards Green, near Burgess Hill receiving the most comments. A petition prepared in 2011 following publication of the shortlist of sites opposing the proposed allocation at Goddards Green was also received;

• comments were opposed to the use of the greenfield site at Goddards Green. There was a general belief that the need for waste sites had not been made clear and that inadequate effort had been made to seek sites on previously-developed land (i.e. brownfield sites);

• the most frequent concerns raised were in relation to transport issues at each site, including congestion, traffic and pedestrian safety, concerns about increases in heavy goods vehicles and traffic noise and pollution;

• there were also many concerns raised about landscape and nature conservation impacts in relation to the allocated sites;

• concerns were raised about impacts on the quality of life for local residents, especially for those in close proximity to the allocated sites, as well as the health impacts with regard to any incinerator proposals; and

• there were also a series of technical responses, including from the waste industry requesting the inclusion of alternative sites in the shortlist, including Shoreham Cement Works.

2.3 The responses to the public consultation have been taken into account, where appropriate, in the Proposed Submission Draft; the main changes to the Plan are summarised in paragraph 4.2. Paragraph 4.12 of this report outlines how consideration of the proposed allocations has been taken forward.

3. Technical Work

3.1 Further technical work has been undertaken to inform the preparation of the draft Waste Local Plan and the selection of sites. The Waste Forecasts have been rolled-forward to cover the period 2011 to 2031. The Forecasts estimate how much waste will need to be managed in the future and what the capacity gap is likely to be taking account of current and permitted capacity for transfer, recycling, treatment, and disposal.

3.2 Further transport assessment of some of the proposed allocations has been undertaken to address highway capacity and road safety issues. A stage 1 Habitats Regulation Assessment of the policies has also been undertaken in accordance with the European Union Directive and national legislation. A sustainability appraisal of the sites has been undertaken and the results taken into account in the Proposed Submission Draft. The draft appraisal is currently the subject of consultation with the key environmental bodies and
the final appraisal will be published for public comment along with the Proposed Submission Draft.

3.3 No substantive changes have been made to the strategies or policies of the Plan as a result of the further technical work.

4. Proposed Submission Draft

4.1 The preparation of the Draft Plan has been the subject of scrutiny by an Environmental and Community Services Select Committee Task Force. The Task Force will make a formal report to the Committee on 27 September 2012 when the Proposed Submission Draft is presented for scrutiny.

4.2 The main changes that have been made to the Plan as a result of the consultation and the further technical work are as follows, although none are considered to be substantive:

- incorporation of the outputs of the updated waste forecasts (NB: some outputs are currently being finalised and will be incorporated into the Plan before it is finalised – only minor changes will be required);
- various amendments to the Plan to clarify the different approaches taken to the reuse of inert waste (i.e. ‘recovery’) and inert landfill (i.e. ‘disposal’);
- amendments to Chapter 3 to provide more detail about the spatial context;
- factual updates to Chapter 4: Strategy and Policy Context with regard to the management of municipal waste and the ‘duty to cooperate’;
- amendments to clarify the Strategic Objectives in Chapter 5;
- amendments to Policy W2 to includes references to the safeguarding of infrastructure, such as wharves, for the movement of waste;
- amendments to Policy W3 to clarify the treatment of proposals within the boundaries of existing waste management sites;
- an addition to Policy W3 to provide guidance on the treatment of agricultural waste and other materials, such as food waste, within agricultural units;
- an addition to Policy W5 to refer to the need for a buffer zone around open windrow composting sites;
- additions to Policies W8 and W9 to refer to the potential impact on natural resources and the environment in relation to non-inert landfill and the depositing of inert waste;
- the addition of Section 7.4 with regard to the potential contribution of the allocated sites to meeting identified capacity shortfalls;
- the addition of references in Policy W12 to water efficiency and heat and energy recovery;
- amendments to Policies W14 and W15 to reflect the relative importance of nature conservation and historic assets;
- amendments to Policy W17 to clarify the approach to flooding including reference to the Sequential and Exceptions Tests;
• amendments to Policy W18 to clarify the approach to the transportation of waste;
• an addition to Policy W19 to refer to site liaison groups;
• the addition of the supporting text to the policies; and
• the addition of implementation and monitoring information.

Purpose

4.3 The Proposed Submission Draft of the Waste Local Plan covers the period to 2031. It sets out the background to the Plan, the spatial context and the strategy and policy context within which it has been prepared, the vision and strategic objectives, the strategies and policies, the strategic waste site allocations (and their accompanying development principles), and implementation and monitoring information.

4.4 The draft Plan is the most up-to-date statement of the County Council’s (and the SDNPA’s) land-use planning policy for waste. Following approval by both authorities, the Proposed Submission Draft (attached as Appendix B) will replace the policies in the approved West Sussex Waste Local Plan: Revised Deposit Draft (July 2004) and be used for development management purposes.

4.5 When adopted by both authorities, it will become part of the statutory ‘development plan’ for West Sussex and it will provide the basis for making consistent land-use planning decisions about planning applications for waste management facilities.

Contents

4.6 Given that the Waste Local Plan covers part of the South Downs National Park, the authorities have sought to ensure that it is consistent with the Plans being prepared by the SDNPA jointly with Hampshire and with East Sussex (and Brighton and Hove) and which cover the other parts of the National Park.

4.7 Section 110 of the Localism Act deals with the need for authorities to engage constructively, actively, and on an ongoing basis in any process where there are cross-boundary issues or impacts. In support of this ‘duty to cooperate’, the National Planning Policy Framework refers to planning authorities demonstrating evidence of having effectively cooperated in planning for strategic cross boundary issues. A new ‘test of soundness’ has been introduced, partly to assess whether there has been cooperation in the preparation of local plans.

4.8 Accordingly, both authorities are continuing to engage with adjoining waste planning authorities and others in the region (and, as appropriate, those elsewhere) to ensure that planned provision of waste management is co-ordinated, as far as is possible, whilst recognising that provision by the waste industry is based on commercial considerations. In particular, the Draft Plan recognises the need for a consistent approach to be taken by the authorities and others to the management of the residual waste that has traditionally been landfilled but which can no longer be managed in that way.
Strategies

4.9 The following strategies have been finalised taking account of technical work and discussions with the waste industry, consultees, and resident and community groups and the results of the informal public consultation:

- **Transfer** (collection, sorting, storage, and onward movement of waste) – allocation of strategic sites that could be used in part for new private facilities together with criteria-based policy to allow proposals to come forward.

- **Open-window composting** - no allocation of new sites but use of a criteria-based policy to allow proposals to come forward.

- **In vessel composting/anaerobic digestion** - allocation of strategic sites that could be used in part for new private facilities together with criteria-based policy to allow proposals to come forward.

- **Inert recycling** - mobile plants likely to provide a significant proportion of new capacity. Allocation of strategic sites that could also be used in part for new private facilities together with criteria-based policy to allow proposals to come forward.

- **Other recovery (including treatment)** - allocation of strategic sites that could be used in part for new private facilities together with criteria-based policy to allow proposals to come forward. Separate criteria-based policy for wastewater treatment works.

- **Inert landfill** - no allocation of sites but use of a criteria-based policy to allow proposals to come forward.

- **Non-inert landfill** - a ‘managed retreat’ from the disposal of waste to land taking into account the closure of the Horton site in 2011 and the scheduled closure of the Lidsey site in 2016/17. No new sites allocated, only the allocation of an extension to the existing site at Brookhurst Wood. A criteria-based policy to judge any applications that come forward.

Strategic Waste Site Allocations

4.10 The three key elements of the spatial strategy that have been used to guide the identification of the allocated waste sites are as follows:

- **First element** - the new sites to be well-related to where the waste arises, i.e. sites along the coast close to the main urban areas and sites in the north and north-east of the County close to the main towns. These new sites will supplement the existing pattern of waste sites in those broad areas.

- **Second element** - no sites allocated within the South Downs National Park or within the Areas of Outstanding Natural Beauty. Small-scale local facilities can still come forward in those areas under a criteria-based policy approach.

- **Third element** - the new sites to have good access to the Lorry Route Network (LRN). The sites to be located within the 3km corridor either side of the roads that form the LRN. Access from the site to the LRN to
be acceptable ‘in principle’, that is, there should not be any technical issues, with regard to highway capacity and road safety, that cannot be overcome.

4.11 The current Waste Forecasts suggest that the authorities need to plan for a total increase in transfer, recycling, and treatment capacity of approximately 0.77 million tonnes per annum to 2031 (allowing for a degree of contingency). Therefore, the allocated sites are both distributed in accordance with the spatial strategy and suitable to accommodate facilities that can make a substantial contribution to delivering the required quantum of additional waste management capacity.

4.12 Table 1 outlines how consideration of the sites identified in the Draft Plan (May 2012) have been taken forward in the Proposed Submission Draft taking into account discussions with landowners and developers, technical work, and the results of the informal public consultation. Account has also been taken of the plans being prepared by the district and borough councils to ensure that they are compatible:

<table>
<thead>
<tr>
<th>Site</th>
<th>District</th>
<th>Use</th>
<th>Proposed Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site north of Wastewater Treatment Works, Ford</td>
<td>Arun</td>
<td>Built waste facility, inert recycling</td>
<td>Allocation - no substantive changes.</td>
</tr>
<tr>
<td>Hobbs Barn, near Climping</td>
<td>Arun</td>
<td>Built waste facility, inert recycling</td>
<td>Allocation – revision to site boundary and minor reduction in site size.</td>
</tr>
<tr>
<td>Fuel Depot, Bognor Road</td>
<td>Chichester</td>
<td>Built waste facility, inert recycling</td>
<td>Allocation – site size limited to 2-2.4 hectares and approx. 50,000tpa as part of mixed-use development.</td>
</tr>
<tr>
<td>Brookhurst Wood</td>
<td>Horsham</td>
<td>Non-inert landfill extension</td>
<td>Allocation – no substantive changes.</td>
</tr>
<tr>
<td>Brookhurst Wood</td>
<td>Horsham</td>
<td>Built waste facility, inert recycling</td>
<td>Allocation - no substantive changes.</td>
</tr>
<tr>
<td>Land west of Wastewater Treatment Works, Goddards Green</td>
<td>Mid Sussex</td>
<td>Built waste facility, inert recycling</td>
<td>Allocation - no substantive changes.</td>
</tr>
<tr>
<td>Decoy Farm, Worthing</td>
<td>Worthing</td>
<td>Built waste facility, inert recycling</td>
<td>Allocation – no substantive changes.</td>
</tr>
</tbody>
</table>

4.13 It is considered that the allocation of the sites in Policy WP10 of the Proposed Submission Draft is technically sound and that their inclusion in the Plan demonstrates that the authorities are committed to planning positively to address existing waste management capacity shortfalls such that the County Council’s aspiration of ‘zero waste to landfill’ by 2031 can be achieved (as agreed at its meeting in May 2011). 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.

4.14 In support of Policy WP10, development principles were established (see Chapter 7 of the Draft Plan) that identified specific issues that will need to be addressed at the planning application stage, as and when proposals come forward for the allocated sites. Changes and additions have been made to the development principles of every site in response to the technical work, consideration of the informal public consultation response, and following discussions with landowners, developers, and other bodies.

5. **Timetable**

5.1 Table 2 outlines the timetable for preparing the Waste Local Plan:

<table>
<thead>
<tr>
<th>Table 2: Waste Local Plan Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Key stages and milestones</strong></td>
</tr>
<tr>
<td>Proposed Submission Draft to SDNPA Planning Committee</td>
</tr>
<tr>
<td>Proposed Submission Draft to SDNPA Full Authority for approval</td>
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<tr>
<td>Proposed Submission Draft to County Council Planning Committee</td>
</tr>
<tr>
<td>Proposed Submission Draft to Environmental and Community Services Select Committee</td>
</tr>
<tr>
<td>Proposed Submission Draft to County Council for approval</td>
</tr>
<tr>
<td>Formal public and stakeholder consultation (Regulation 19 stage) on Proposed Submission Draft (nine weeks)</td>
</tr>
<tr>
<td>Submission to Secretary of State</td>
</tr>
<tr>
<td>Independent Examination</td>
</tr>
<tr>
<td>Receive Planning Inspector’s report</td>
</tr>
<tr>
<td>Adoption by County Council and SDNPA</td>
</tr>
</tbody>
</table>

5.2 Following approval by both authorities, the approved Proposed Submission Draft will be subject to formal public consultation from 9 November to 11 January 2013 to allow representations to be made about (a) whether it has been prepared in accordance with all the legal requirements and (b) whether its contents are ‘sound’.

5.3 Following consideration of the representations received on the Proposed Submission Draft, it will be amended if necessary (minor changes only) and formally submitted to the Secretary of State.

5.4 If substantive changes to the Draft Plan are required following consideration of the representations, the Plan will be redrafted and reconsidered by the authorities and then subject to a new period for representations to be made about whether legal requirements have been met and about its ‘soundness’.

5.5 An independent Inspector appointed by the Government will consider the
representations made on the Proposed Submission Draft and examine matters relating to legal compliance and 'soundness'. The examination will include consideration of the representations received on the Proposed Submission Document and the final sustainability appraisal report.

5.6 As part of the examination, the Inspector may indicate that changes need to be made to the submitted Plan to make it ‘sound’ and suitable for adoption. The authorities will then consult on any modifications before submitting them to the Inspector. Following the examination, the Inspector will report whether the modified Plan is ‘sound’ and if it is, it will be adopted by both authorities when it will become part of the statutory ‘development plan’ for West Sussex.

5.7 It should be noted that further minor changes may be made to the Plan as it progresses towards approval by County Council on 19 October 2012. The intention is that the full South Downs National Park Authority, at its meeting on 18 September 2012, will authorise SDNPA officers to agree any minor changes to the Plan that arise as a result of the consideration of the draft Plan by this Committee and by the Environmental and Community Services Select Committee on 27 September 2012.

6. **Conclusion and Recommendation**

6.1 The draft Plan has been prepared following consideration of the results of the informal public consultation and the further technical work. Only minor changes have been made to the Plan as a result and it is considered that the Proposed Submission Draft is a ‘sound’ document that it should be taken forward for approval.

6.2 It is **recommended**, therefore, that the Committee consider the Proposed Submission Draft (attached as Appendix B) and inform the Deputy Leader about its views on its contents before it is submitted to County Council in October 2012 for approval for formal public consultation purposes.

10. **Crime and Disorder Act Implications**

There are no identifiable Crime and Disorder Act implications.

11. **Human Rights Act Implications**

The High Court decided that Article 6(1) of the Convention which requires a fair hearing by an impartial tribunal does not apply to the Local Plan making process as no determination of civil rights is involved.

**Michael Elkington**
Strategic Planning Manager

**Appendices**
A – Summary of Informal Public Consultation on the Draft Plan
B – Proposed Submission Draft of the Waste Local Plan

**Background Papers**
None
Contact: Michael Elkington x77737
Appendix A: Summary of Informal Public Consultation on the Draft Plan

(A) County Local Committees/Area Committees

North Horsham County Local Committee (25 June 2012)

Members were concerned about increased traffic and noise for residents of Langhurstwood Road and asked what would be done to ensure maximum opportunities to mitigate the problems caused by the extension of the Brookhurst Wood site; it was noted that the CLC had supported the installation of an acoustic fence to ease the problem with noise. It was explained that this principle could be extended to any new development.

Members suggested that previously there had been a piecemeal approach to the planning of the site from Horsham District Council and the County Council and that a holistic approach was needed. Members emphasised the importance of considering the cumulative impact of all developments and an assessment of the impact of all HGV movements and suggested amendments to the wording of the development principles.

Joint Downland Arun Area Committee (9 July 2012)

Some Members raised concern about the increase in tonnes that the Ford Site could accommodate. It was explained that this was the theoretical capacity and that this would be reassessed following receipt of the updated transport assessment.

Members questioned how much waste from outside the County. It was confirmed that the current plan does not take account of waste from London and that the aim was to be self sufficient with regard to waste.

South Chichester County Local Committee (10 July 2011)

The Committee’s view was that it was concerned regarding vehicular access to the site and the possible increase in traffic congestion; and to note the potential for increased flooding events.

South Mid Sussex County Local Committee (12 July 2012)

The Committee recommended that (i) the Goddards Green site be allocated in the draft West Sussex Waste Local Plan; (ii) that the development principles be amended to include flood risk, the impact on the National Park to be considered, and to strengthen the point that HGVs must be routed via the lorry network and not through Burgess Hill; and (iii) that the Deputy Leader pays close attention to the comments raised by the public and the Committee.

Worthing County Local Committee (23 July 2012)

The Committee requested clarity regarding Worthing Borough Council’s position on this land, as landowner, before they could recommend that this site be allocated or comment on the development principles for the site.

(B) Summary of Public Comments
There were approximately 300 responses to the consultation, of which approximately 75% were received from members of the public. Over 50% of responses have been received through the online survey.

Vision

There was strong overall support expressed for the vision, however a number of issues were raised related to the specific objectives as explained below, including comments highlighting the conflicts between some of the strategic objectives.

Strategic Objectives, and Use-Specific and Development Management Policies

Zero waste to landfill
- Comments questioned the realism of aspirations to achieve zero waste to landfill by 2031 and comments, including from the waste industry, highlighted that there will always be some types of waste that cannot be re-used/recycled that will require disposal to land.
- Contrasting comments largely from resident groups highlighted that zero waste to landfill should be achieved sooner than 2031, and that references to ‘aspiration’ should be removed to make the vision more robust.
- Various contrasting comments, including from the members of the public and the waste industry, sought clarification on the role of ‘landraise’ and use of landfill and secondary aggregates/inert/construction and demolition waste in restoration, for example of former mineral workings.
- A waste industry comment highlighted the potential consequences of an objective reducing waste to landfill provision - in terms of environmental impacts in transporting waste and the need to cooperate with other authorities in exporting waste - if insufficient provision is made for waste to landfill within the county.

Waste streams
- A comment from a community group highlighted the need for coherent aims for each individual stream of waste to be provided in the plan.
- A number of comments, largely from residents, were received about greater discussion being needed in the plan of waste prevention, this being at the top of the waste hierarchy.

Self-sufficiency
- Some comments called for further recognition of the current role of and future need for cross-border movements of waste, and cooperation with neighbouring authorities in planning for waste through the Duty to Cooperate and to meet the requirements of the National Planning Policy Framework.
- In particular this concerned sites at the county border with nearby origins of waste outside the county, existing imports/exports of waste to/from neighbouring counties generally, and concerned specific types of waste streams such as hazardous waste.
- Other comments supported a move to self-sufficiency in the waste that West Sussex handles and for further explanation of why any cross-border movements should only be temporary. Some residents requested a binding commitment not to import waste from other counties.

Transport and provision of sites close to the source of waste
- A number of residents comments highlighted the contradictions of objectives to make provision for waste handling as close as possible to the sources of waste, against the objective to protect the health and amenity of local residents.
- Comments questioned the realism of the objective for rail and water transport to play a role in moving waste to sites, and a comment highlighted that self-sufficiency in handling waste may not be consistent with the economics of rail and water transport which generally requires movement of waste over longer distances.
- Contrasting comments largely from residents suggested that more should be done in waste site selection to use rail transport to support the transport of waste.
- The need for wider consideration of impact on amenity of Public Rights of Way users in the development principles for all sites was raised, in particular in terms of traffic concerns.

**Existing facilities**
- Comments were received from the waste industry highlighting the importance of policies in the Plan supporting the protection of and where appropriate the extension of existing facilities across the county to meet waste management needs, as well as comments that highlighted the potential benefits of co-location of waste uses.

**South Downs National Park/Areas of Outstanding Natural Beauty**
- A small number of comments highlighted the fact that policies should not weigh against potentially appropriate waste development in these protected areas, in particular which might enhance the special characteristics of these areas.
- A small number of comments also highlighted that sites close to the National Park should be carefully designed to not impact on views from the National Park.

**Other developments**
- A small number of comments sought clarification on the role of waste management in the construction and operation of new developments.

**Carbon emissions**
- Comments were received about provision of sites around the county which maximise waste to green energy solutions, including combined heat and power facilities such as anaerobic digestion, and which utilise renewable and low carbon energy in their operation.

**Other general issues**
- A small number of comments highlighted that clarification should be made to the fact that policies are interrelated and the plan needs to be read as a whole.
- Some comments also highlighted the fact that it was difficult to see the context for a number of the use specific and development management policies due to the fact that supporting text was not included in the Regulation 18 version of the draft Plan, and which called for further consultation on specific supporting text wording.
- A further comment from a local planning authority highlighted that it would be desirable for the site specific development principles to be included specifically within the policies for individual sites.
- Comments from statutory stakeholders and the waste industry sought clarification on the preparation of the Sustainability Appraisal of the draft Waste Local Plan and how this has contributed to informing the preparation of the draft Plan.
- A small number of residents commented on the challenges in understanding the detail of the policies in the plan through the consultation process.
- A number of concerns were highlighted, particularly from members of the public about incineration as a method of dealing with waste.

**Site Allocations**

**Site north of Wastewater Treatment Works, Ford (approx 50 responses)**
- A parish council comment about spatial approach of this site and the Hobbs Barn site being in close proximity.
- General concerns were highlighted by residents and local parish councils about traffic volumes around the site, including concerns that previous Transport Assessment work for this site was only based on a capacity of 100ktpa, as opposed to the stated capacity of the site of up to 250ktpa within the draft Plan. Parish council comments requested further Transport Assessment work to be undertaken whilst concerns were also highlighted about enforcement of any lorry routing agreement and impacts on local road maintenance.
- Local planning authority concerns were highlighted about the justification for increasing the stated capacity of the site, and the potential to process inert waste, and the consequential highway impacts.
- Comments from Parish Councils highlighted concerns about local environmental impacts including noise and air quality on nearby residents.
- Support for inclusion of this site was highlighted by a waste industry comment.

**Hobbs Barn near Climping (approx 40 responses)**
- A parish council comment was made about spatial approach of this site and the Ford site being in close proximity.
- Concerns, in particular from the local planning authority, were highlighted about visual impact on the undeveloped ‘Strategic Gap’ between Middleton-on-Sea and Littlehampton and the Coast to Downs Green Infrastructure Corridor.
- General concerns were raised about HGV traffic generated by the site, in particular from local parish councils, whilst a specific site access junction safety concern was also raised.
- The specific issue of impact on the Ryebank Rife watercourse was highlighted by the Environment Agency as an issue that needs to be considered.
- Landowner comments were supportive of the sites inclusion and noted potential operator interest, comments about availability and deliverability, and responses to some of the local concerns, including about traffic and visual impacts of the site.

**Fuel Depot, Bognor Road, Chichester (approx 25 responses)**
- Concerns were raised by a range of stakeholders about the traffic implications of this site, particularly in relation to slow lorries accessing/leaving the site from the A259 dual carriageway, as well as impacts on the Bognor Road/A27 roundabout, as well as flooding concerns.
- Statutory stakeholder comments were highlighted about land contamination and remediation required at the site.
- The landowner of the site supports the site being included in the Plan, assuming that it can be developed consistent with mixed use development at the site with a single waste management facility at a capacity of 50,000tpa, as opposed to 250,000tpa.
- Concerns were also noted at the site about potential flooding issues, in particular from the City Council.

**Brookhurst Wood, near Horsham (built waste facility and landfill extension) (approx 30 responses)**
Concerns were raised from local residents about the impacts of increased traffic on local access roads and to and from the A264 junction. Residents also highlighted the issue that other sites around the county should be brought forward to share the burden of managing waste treatment and landfill. Resident concerns were also highlighted about the intrusive visual impacts of further landfill at the site.

Specific issues were raised by statutory stakeholders about local wildlife, ancient woodland and surface and groundwater impacts that need to be considered.

Specific parish council and local resident comments sought clarification on the role of the site in handling waste from existing operations at the site, as opposed to the handling of waste from elsewhere in the county raising specific concerns about additional traffic pressures this would generate.

Local planning authority comments raised the issue of the site allocation needing to support proposals for comprehensive mixed use development at the site.

Comments from the waste industry were supportive of allocations at these sites.

**Land west of Wastewater Treatment Works, Goddards Green, near Burgess Hill (approx 100 responses)**
- Many comments from local residents raised concerns about the use of this greenfield site, and which called for a further detailed search for brownfield alternatives.
- Many concerns were received from residents and parish councils/community groups about impacts on transport (including A23 access), local wildlife/flora and fauna, landscape and amenity (including for equestrians), local air pollution and health, odour, noise, flooding, property blight, and on neighbouring local land uses, including a local college. A petition prepared in 2011 following publication of the shortlist of sites opposing the proposed allocation of this site was also received.
- The specific issue of impact on the River Adur East watercourse and the adjacent local wildlife site were highlighted by statutory stakeholders as issues needing consideration.
- Specific concerns were received about air pollution and landscape impacts (in particular on the South Downs National Park) if an incinerator was to be built on the site.
- Comments were raised about problems in the consultation notification process for local residents, as well as a lack of clarity for local residents about what is proposed at the site.
- Concerns were raised about impacts on adjacent Northern Arc housing development and business park proposals, whilst the issue of compatibility with proposals in the draft District Plan was highlighted by the local planning authority.

**Decoy Farm, Worthing (approx 35 responses)**
- Specific comments were raised about the need for more detail on the environmental, lorry movement and job creation impacts associated with the site, including from residents. Specific comments were highlighted about local wildlife impact and the Teville Stream Restoration Project specifically by statutory stakeholders.
- Comments about the role of the site in relation to the potential relocation of waste uses associated with Shoreham Harbour regeneration proposals were also highlighted.
- A representation was received from the waste industry recording interest in the site.
- The response from Worthing Borough Council raised concerns about the site being allocated for waste uses because of how this might affect other Core Strategy aspirations for mixed uses on the site.

**Other Sites**

- A range of comments were made by respondents about other non-shortlisted waste sites. For ‘Land at Hickstead’ a representation was received from the local landowner requesting re-insertion of this site as an allocated waste site. A number of local resident and parish council comments were received concerned that this site would be reallocated without consultation, and highlighted the issue of the substantial number of comments that were made against this site during previous consultation.
- ‘Shoreham Cement Works’ was highlighted as a potential suitable alternative brownfield waste site allocation by members of the public, particularly in reference to the Goddards Green site. Waste industry responses also highlighted their potential interest in this site, notwithstanding policies intended to protect protected landscapes from unnecessary and inappropriate development (see previous South Downs National Park/AONB comments).
- A range of other existing or potential future waste sites were also highlighted by various waste industry operators/land owners for potential expansion or inclusion, particularly in relation to restoration of former minerals workings, including Laybrook Quarry and Brick Works (nr Ashington), Burleigh Oaks Farm (nr Turners Hill), Dantree Farm (at Bolney), Ford Airfield, and Rock Common Quarry (Washington).
- Local community action group comments were also received from residents of Thakeham Parish supportive of proposals not to include Laybrook Quarry and Brick Works, and Broadbridge Farm (Ashington) from the list of allocated waste sites.
- The issue of future Waste Water Treatment Capacity at Shoreham Harbour related to Joint Area Action Plan proposals was also highlighted by Southern Water and the District Council.