

East Sussex, South Downs and Brighton & Hove
Waste and Minerals Development Plan Document

Submission Waste and Minerals Plan
Main Modification Consultation
Summary of Responses

November 2012

Introduction 1

1 Introduction

1.1 The East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (WMP) provides planning policy for waste management and minerals production for the Plan Area to 2026. The WMP was submitted to the Secretary of State on 1 June 2012 for legal compliance and soundness testing. Between 18 September and 28 September, Planning Inspector Mrs Susan Holland MA DipTP MRTPI DipPollCon held Public Hearings on aspects of the WMP as part of the Plan's Public Examination.

1.2 Under the Localism Act 2011, local planning authorities now have the power to make Main Modifications to the Plan so that it can be considered sound. As a result of the Government's implementation of the National Planning Policy Framework (NPPF) in March 2012, the Inspector has indicated that in order for the Plan to be sound the Authorities should modify the Plan by inserting a new policy that is intended to confirm that the Plan has a 'presumption in favour of sustainable development' (see Appendix A). A four weeks period of public consultation on the Main Modification took place between Friday 12 October and Friday 9 November 2012. Before issuing her report on the Plan's soundness, the Inspector will consider the representations made and this document contains a summary of the representations made along with the Authorities' response to those comments. Details of the representations submitted can be found in Appendix B.

2 Summary of comments and the Authorities' response

2 Summary of comments and the Authorities' response

Representation ID	Summary of comment	Authorities' Response
WMMC1	<p><i>This was the Authorities' Test Comment. It is shown here to ensure that that the Representation ID's are consecutive.</i></p>	N/A
WMMC2 (Laughton Parish Council)	<p>The term 'sustainable development' lacks a clear definition and is open to interpretation.</p> <p>Concern policy WMP1 emphasises economic development at the expense of the environment, (including designated areas.)</p>	<p>WMP1 is intended to be an overarching policy that sets the context for other policies contained within the Plan. It reflects the content of the NPPF and is intended to promote a balanced approach to development.</p> <p>In paragraph 6 of the NPPF it states that "the policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system." In addition in paragraph 3 of Planning Policy Statement 10 (PPS10) it states that "...planning authorities should ... help deliver sustainable development through driving waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as the last option...". The Waste and Minerals Plan is based on national planning policy, including the policies contained within the NPPF and PPS10. The Plan also reflects local priorities of the Plan Area. As such, all policies in the Development Plan, when taken together as a whole, are intended to ensure sustainable development.</p> <p>The NPPF provides guidance that promotes the "conserving and enhancing of the natural world" between paragraphs 109 and 125. Additionally, Plan Policy WMP27 'Environment and Environmental Enhancement' makes provision for the protection of environmental assets including designated areas.</p> <p>Should any proposed development be located within the South Downs National Park, Plan Policy WMP2 'Minerals and waste development affecting the South Downs National Park' would also be considered. Policy WMP2 restricts development that may be inappropriate in the National Park.</p>

Summary of comments and the Authorities' response 2

Representation ID	Summary of comment	Authorities' Response
WMMC3 (Mrs Edmunds)	<p>The Pebsham Area should be excluded from the presumption in favour of sustainable development. WMP1 would be in conflict with other policies contained in the Local Plan for green spaces and existing and planned over-development of the area.</p>	<p>WMP1 is intended to be an overarching policy that sets the context for other policies contained within the Plan. It reflects the content of the NPPF and is intended to promote a balanced approach to development.</p> <p>To include area specific detail into this policy would not be appropriate.</p> <p>The sustainability of the Pebsham Area for the development of additional waste management capacity will be considered in detail during the preparation of the Waste and Minerals Sites Plan.</p>
WMMC4 (Mr Temple-Pediani)	<p>KTI Energy Ltd has established with Ministers that a Waste Plan is unable to presume in favour of sustainable development unless the subject of that sustainable development is simultaneously entered into the host Local Plan.</p> <p>Promotion for CHP Plant on the Three Bridges - Horsham Rail Line</p>	<p>WMP1 is intended to be an overarching policy that sets the context for other policies contained within the Plan. It reflects the content of the NPPF and is intended to promote a balanced approach to development.</p> <p>Site specific detail will be considered in the preparation of the Waste and Minerals Sites Plan, and their inclusion in Policy WMP1 would not be appropriate.</p> <p>In any event, the land mentioned is in West Sussex and therefore not within the boundary of the Plan Area.</p>
WMMC5 (Mr Masefield)	<p>The link between waste disposal and sustainable development is unclear.</p> <p>Concern that reuse of brown-field sites for waste uses would prevent opportunities for housing or industrial use.</p> <p>States that waste is a developing industry and is a significant employer.</p> <p>States that agricultural land is a valuable resource which could be lost if used for waste facilities.</p>	<p>WMP1 is intended to be an overarching policy that sets the context for other policies contained within the Plan. It reflects the content of the NPPF and is intended to promote a balanced approach to development.</p> <p>In paragraph 6 of the NPPF it states that "the policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system." In addition in paragraph 3 of Planning Policy Statement 10 (PPS10) it states that "...Planning authorities should ... help deliver sustainable development through driving waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as the last option..." The Waste and Minerals Plan is based on national planning policy, including</p>

2 Summary of comments and the Authorities' response

Representation ID	Summary of comment	Authorities' Response
		<p>the policies contained within the NPPF and PPS10. The Plan also reflects local priorities of the Plan Area. As such, all policies in the Development Plan, when taken together as a whole, are intended to ensure sustainable development.</p> <p>The aims of the NPPF and PPS10 are interpreted locally in the vision and objectives set out in Section 2 of the Plan (Page 24), and the policies within the body of the Plan.</p> <p>District and Borough Local Plans contain policies which cover housing and other industrial uses. The policies in the Plan should be read in conjunction with District and Borough Plans.</p> <p>Policy WMP7 (WMP7a, WMP7b) considers how certain types of land and areas should be preferred for waste development. Specific reference to land of 'High quality agricultural land' can be found in Policy WMP27. This states that "a) To conserve and enhance the local character and environment of the Plan Area, permission will not be granted where the development would have a significant adverse impact on the following sites: ... High quality agricultural land ...".</p> <p>Should any proposed development be located within the South Downs National Park, Plan Policy WMP2 'Minerals and waste development affecting the South Downs National Park' would also be considered. Policy WMP2 restricts development that may be inappropriate in the National Park.</p>
WMMC6 (Mr Trussler - Sussex Waste Recycling Ltd T/A Rabbit Skips)	Support for policy.	Noted.
WMMC7 (Ms Alison Dunbar-Dempsey -Chalvington with Ripe Parish Council)	The term 'sustainable development' lacks a clear definition and is open to interpretation.	WMP1 is intended to be an overarching policy that sets the context for other policies contained within the Plan. It reflects the content of the NPPF and is intended to promote a balanced approach to development.

Summary of comments and the Authorities' response 2

Representation ID	Summary of comment	Authorities' Response
	<p>Policy promotes economic, social and environmental development. Policy does not provide clear guidance as to how to resolve conflict between these priorities when it arises.</p> <p>Concern policy WMP1 emphasises economic development at the expense of the rural areas.</p> <p>Support principle of Waste Hierarchy. Seeking reassurance that the inclusion of WMP1 does not override the priority as currently found in the plan for the Waste Hierarchy.</p> <p>Object to WMP1 should it result in any mention of landraise on greenfield sites appearing in the plan.</p>	<p>In paragraph 6 of the NPPF it states that "the policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system." In addition in paragraph 3 of Planning Policy Statement 10 (PPS10) it states that "...Planning authorities should ... help deliver sustainable development through driving waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as the last option...". The Waste and Minerals Plan is based on national planning policy, including the policies contained within the NPPF and PPS10. The Plan also reflects local priorities of the Plan Area and provides a local interpretation of sustainable development insofar as waste management is concerned. As such, all the policies mentioned above when taken together as a whole, are intended to ensure sustainable development which reflects an appropriate balance between social, economic and environmental considerations.</p> <p>The Plans approach to locating for waste facilities(excluding land disposal) can be found in Policy WMP7a. This emphasises that "Sites for additional waste recycling and recovery facilities and physical extensions to existing, should be sought within the broad Areas of Focus indicated on the Key Diagram...". These areas are identified in areas close to waste arisings, with good access to the road network, that are outside of any statutory environmental designations.</p> <p>Plan policy WMP27 'Environment and Environmental Enhancement' makes provision for the protection of environmental assets.</p> <p>Should any proposed development be located within the South Downs National Park, Plan Policy WMP2 'Minerals and waste development affecting the South Downs National Park' would also be considered. Policy WMP2 restricts development that may be inappropriate in the National Park.</p> <p>The inclusion of policy WMP1 is not intended to change the strategy proposed in the plan. The strategy, as it stands, is one of providing for net self sufficiency in the management of waste through the provision of recycling and recovery capacity in place of land disposal in accordance with the Waste Hierarchy.</p>

2 Summary of comments and the Authorities' response

Representation ID	Summary of comment	Authorities' Response
WMMC8 (Ms Alison Dunbar-Dempsey -Chalvington with Ripe Parish Council)	This representation is identical to WMMC7.	See response to WMMC7.
WMMC9 (Ms Catherine McLeod - Environment Agency)	Support for the inclusion of the second bullet point and footnote in relation to Policy WMP 1 which makes specific reference to national and European designated sites and flood risk constraints which may restrict development.	Noted
WMMC10 (Mr John Lister - Natural England)	Support for policy. Support for inclusion of footnote exempting land within a National Park; Areas of Outstanding Natural Beauty; sites protected under the Birds and Habitats Directives and /or as Sites of Special Scientific Interest; and designated heritage assets; and locations at risk of flooding or coastal erosion;	Noted
WMMC11 (Ms Irina Davis - Suffolk County Council)	No comment at this time.	Noted

Main Modification (subject of consultation) A

Appendix A: Main Modification (subject of consultation)

Ref.	Part of Submission Plan Changed		Change	Reason for Modification
	Page	Para <i>Other</i>		
MM1	32	Insert as new text and new policy WMP 1 after paragraph 2.47 and before the heading 'Minerals and Waste Development Affecting the South Downs National Park (WMP1)'	<p>(Note: new inserted wording is shown as highlighted and underlined, deleted wording is struck through.)</p> <p>Insert the following text and policy:</p> <p><u>Presumption in Favour of Sustainable Development (WMP 1)</u></p> <p><u>Purpose of Policy WMP 1</u></p> <p>To ensure that decisions are taken in line with the presumption in favour of sustainable development as set out in the National Planning Policy Framework (NPPF).</p>	<p>The presumption in favour of sustainable development is seen by Government as being at the heart of their planning policy reforms. The National Planning Policy Framework indicates that</p>

A Main Modification (subject of consultation)

Ref.	Part of Submission Plan Changed		Change	Reason for Modification
	<i>Page</i>	<i>Para</i>	(Note: new inserted wording is shown as highlighted and underlined, deleted wording is struck through.)	
		<i>Other</i>	<p>■</p> <p>The Government published in March 2012 its National Planning Policy Framework (NPPF) which sets out its planning policies for England and how these are expected to be applied.</p> <p>■</p> <p>At the heart of the NPPF is a presumption in favour of sustainable development. The NPPF requires that policies in Local Plans should follow the approach of the presumption in favour of sustainable development.</p> <p>■</p> <p>The Waste and Minerals Plan is based on the principles of sustainable development. This is demonstrated in the Vision and Objectives, and the policies which seek sustainable solutions.</p> <p>■</p> <p>Planning law requires planning decisions to be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF states that it does not change the statutory status of the development plan as the</p>	Local Plans should follow this approach.

Main Modification (subject of consultation) A

Ref.	Part of Submission Plan Changed	Change	Reason for Modification						
	<table border="1"> <tr> <td data-bbox="255 638 359 728">Page</td> <td data-bbox="255 728 359 2161"></td> </tr> <tr> <td data-bbox="255 638 359 817">Para</td> <td data-bbox="255 817 359 2161"></td> </tr> <tr> <td data-bbox="255 638 359 2161">Other</td> <td data-bbox="255 817 359 2161"></td> </tr> </table>	Page		Para		Other		<p>(Note: new inserted wording is shown as highlighted and underlined, deleted wording is struck through.)</p> <p><u>starting point for decision making.</u></p> <p>■</p> <p><u>In order to ensure that the presumption is taken into account in the Authorities approach to waste and minerals development, the following policy has been included in the Plan:</u></p> <p>■</p> <p><u>Policy WMP 1</u></p> <p><u>The Authorities will take a positive approach to waste and minerals development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.</u></p> <p><u>Waste and minerals development that accord with policies in this Plan and subsequent Plans will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the proposal or the relevant policies are out of date at the time of making the decision, then the Authorities will grant permission unless material considerations indicate otherwise - taking into account whether:</u></p> <ul style="list-style-type: none"> • <u>Any adverse impacts of granting permission would significantly</u> 	
Page									
Para									
Other									

A Main Modification (subject of consultation)

Ref.	Part of Submission Plan Changed		Change	Reason for Modification
	<i>Page</i>	<i>Para</i>	(Note: new inserted wording is shown as highlighted and underlined, deleted wording is struck through.)	
		<i>Other</i>	<p>and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</p> <ul style="list-style-type: none"> Specific policies in that Framework indicate that development should be restricted¹. <p>Footnote 1:</p> <p>For example, those policies relating to land within a National Park, an Area of Outstanding Natural Beauty; sites protected under the Birds and Habitats Directives and/or as Sites of Special Scientific Interest; designated heritage assets; and locations at risk of flooding or coastal erosion.</p>	

Table 1

Representations Submitted B

Appendix B: Representations Submitted

Comment

Consultee	Mrs Karen Crowhurst (637657)
Email Address	[REDACTED]
Company / Organisation	Laughton Parish Council
Address	17 Geering Park Hailsham BN27 2LW
Event Name	Send us your comments (Main Modification consultation)
Comment by	Laughton Parish Council (Mrs Karen Crowhurst)
Comment ID	WMMC2
Response Date	01/11/12 15:08
Status	Submitted
Submission Type	Web
Version	0.1

Name and Address

Please provide your full name and contact address, including postcode.

Laughton Parish Council c/o Lindisfarne Common Lane Laughton BN8 6BY

Email address

Please provide a contact email address

[REDACTED]

I am writing as

on behalf of a company or organisation

Organisation

Laughton Parish Council

Position

Councillor

Submit yours commets

Alternatively you may type your comments in here.

We want to be assured that the presumption in favour of sustainable development is not a green light to waste companies to manipulate the planning system for their own profit maximisation to the detriment of all rural areas regardless of whether they are designated areas or not. The waste hierarchy must be the top consideration and not secondary to the ticking of boxes under the heading "Sustainable Development" which looks likely to be able to be interpreted in an infinite number of ways to suit a developer.

Comment

Consultee	Mr Edmunds 000000
Email Address	[REDACTED]
Address	24 Ilsham Drive Exhill on Sea T40 200
Event Name	Send us your comments on main modification consultation
Comment by	Mr Edmunds
Comment ID	W0000
Response Date	04/00/2004
Status	Submitted
Submission Type	Web
Version	0.0

Name and Address

Please provide your full name and contact address including postcode.

Mr. M. Edmunds 24 Ilsham Drive Exhill-on-sea Sussex. T40 200

Email address

Please provide a contact email address

[REDACTED]

I am writing as

an individual

Submit your comments

Alternatively you may type your comments in here.

notwithstanding no site has been indicated for waste development at Pebsham there should be no presumption of sustainability here because the increase in transport with the new link road and its imminent housing and industrial development is unsustainable because we are already at saturation point with poor air quality and health will continue to suffer. Also any future waste development is not sustainable on the environmental front because it detracts from the development of the green spaces and the country park and the presumption of sustainability will not be met for future generations in this area who have the right to a cleaner air environment. No local plan has a presumption of sustainability

for waste□only an improvement in an area long affected by poor decisions for residents on waste continuations.

Comment

Consultee	Dr W Temple-Pedani 2
Email Address	
Company / Organisation	T
Address	Titan Court Raporte Way Luton 4
Event Name	Send us your comments on main modification consultation
Comment by	T Dr W Temple-Pedani
Comment ID	W 4
Response Date	0 2 0
Status	Submitted
Submission Type	Letter
Version	0.2
Files	rTemple-Pediani.pdf

Name and Address

Please provide your full name and contact address including postcode.

Dr Gill Temple-Pedani Managing Director T Energy Limited Titan Court Raporte Way Luton Bedfordshire 4

Email address

Please provide a contact email address

I am writing as

Please choose

Send us your comments

If you have completed your comments outside of the survey please upload them here.

rTemple-Pediani.pdf

Matthew Breeze

From: [REDACTED]
Sent: 12 October 2012 09:44
To: Waste and Minerals DF
Cc: [REDACTED]
Subject: Re: CONSULTATION ON MAIN MODIFICATION between Friday 12 October and Friday 9 ...
Follow Up Flag: Follow up
Flag Status: Blue

KTI Energy Limited has already responded to the East Sussex Waste Plan in the following terms:

West Sussex County Council is converting its household waste into around 160,000 t/a SRF by MBT plant at Warnham. Discussion had with a joint meeting of waste officers (Tony Cook; Phillip Russell) at Lewes had purpose to encourage East Sussex CC and Brighton & Hove C to produce fuel (SRF, woodchip, rubber chip/crumb) from both household and non-household waste to add to that to be produced by West Sussex CC.

The collective total of fuel should then be sufficient to justify a major renewable CHP scheme serving a community with green electricity and heat. The one Sussex community on record planning an extensive district heating network is Crawley. The long-standing proposal from KTI Energy Limited is that a renewable CHP station is constructed on the Three Bridges-Horsham rail line receiving fuel from West Sussex CC, East Sussex CC and Brighton & Hove C.

Where fuel from East Sussex/Brighton waste is to be produced, and the logistics of its delivery to the aforementioned CHP station, should be determined by cogent study involving three contiguous waste authorities. The study should invite Surrey CC and Kent CC to make appropriate contribution.

Dr Bill Temple-Pediani
Managing Director
KTI Energy Limited
16 Titan Court
Laporte Way
Luton
Bedfordshire LU4 8EF

Matthew Breeze

From: [REDACTED]
Sent: 02 November 2012 16:31
To: Waste and Minerals DF
Cc: [REDACTED]
Subject: Re: Potential date for additional public hearing session - 27 November 2012
Follow Up Flag: Follow up
Flag Status: Blue

Dear Sir/Madam,

My company has established with Ministers that a Waste Plan is unable to presume in favour of sustainable development unless the subject of that sustainable development is simultaneously entered into the host Local Plan. Thus if the Waste Plan proposes a renewable CHP scheme fired by SRF serving a community, the location of CHP station, and the community it will supply with green electricity and heat, must be simultaneously entered into the Waste Plan and the Local Plan hosting that community.

It does not require my presence at the additional hearing to inform the Inspector of what must be self-evident to her.

Regards

Dr Bill Temple-Pediani
Managing Director
KTI Energy Limited

Comment

Consultee Mr Richard Asefield 44

Email Address [REDACTED]

Address Coopers Farm
Church Lane
Ewes
A4

Event Name Send us your comments Main modification consultation

Comment by Mr Richard Asefield

Comment ID W444

Response Date 02

Status Submitted

Submission Type Letter

Version 0.2

Files rasefield.pdf

Email address

Please provide a contact email address

[REDACTED]

I am writing as

Please choose

Send us your comments

If you have completed your comments outside of the survey please upload them here.

[rasefield.pdf](#)

Matthew Breeze

From: Richard Masefield [REDACTED]
Sent: 11 October 2012 17:10
To: Waste and Minerals DF
Subject: Waste disposal plan

Follow Up Flag: Follow up

Flag Status: Blue

I am sure I am not alone in wondering what on earth waste disposal has to do with a 'presumption in favour of sustainable development' - unless the Government is suggesting that the use of brown field sites for waste disposal would be denying opportunities to industry or housing? In which event I would like to point out that:

- a) Waste Disposal/recycling is in itself a developing industry and employer - and
 - b) Green field sites are part of a valuable agricultural resource which one would certainly hope will be utilised and developed in the future to help feed an expanding population. (Or doesn't the Government recognise agriculture as a vital industry?)
- Richard Masefield (Sussex farmer)

Comment

Consultee Danny Trussler 01273333333

Email Address [REDACTED]

Address Sussex Waste Recycling Ltd T/A Abbit Skips
Unit 2 Hartwell Road
Bancing
PO10 1TQ

Event Name Send us your comments on main modification consultation

Comment by Danny Trussler

Comment ID W000000

Response Date 01/01/2020

Status Submitted

Submission Type Letter

Version 0.2

Files rabbits.pdf

Name and Address

Please provide your full name and contact address including postcode.

Danny Trussler Head of Planning Minerals and Waste SussexWaste Recycling Ltd T/A Abbit Skips
Unit 2 Hartwell Road Bancing Business Park Bancing PO10 1TQ

Email address

Please provide a contact email address

[REDACTED]

I am writing as

Please choose

Send us your comments

If you have completed your comments outside of the survey please upload them here.

[rabbits.pdf](#)

Matthew Breeze

From: Danny Trussler [REDACTED]
Sent: 31 October 2012 13:41
To: Waste and Minerals DF
Subject: Consultation on Main Modification to the Waste and Minerals Plan between 12th October and 9th November 2012.

Follow Up Flag: Follow up

Flag Status: Blue

Dear Sir/Madam,

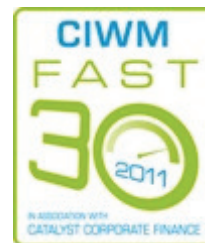
Further to your email of the 11th October 2012 regarding the above, my Company wishes to support the inclusion of the proposed main modification, by the insertion of new policy (WMP 1) which is intended to confirm that the Plan has a 'presumption in favour of sustainable development'

Thank you for consulting my Company on this matter.

Yours sincerely,

Danny Trussler
Head of Planning, Minerals and Waste
 Sussex Waste Recycling Ltd T/A Rabbit Skips
 Unit 2 Chartwell Road
 Lancing Business Park
 Lancing
 BN15 8TU
 Tel: 01903 762020
 Fax: 01903 762030
 [REDACTED]

www.rabbitskips.co.uk



CREATING ENERGY FROM WASTE

A list of director's names is available for inspection at the address below. Information in this message is confidential and may be legally privileged. It is intended solely for the person to whom it is addressed. If you are not the intended recipient, please notify the sender and please delete the message from your system immediately. The views expressed by the individual initiating this message do not necessarily represent the views of Sussex Waste Recycling Ltd. The contents of any attachment to this message may contain software viruses that could damage your computer system.

Whilst Sussex Waste Recycling Ltd has taken every reasonable precaution to minimize this risk, we cannot accept liability for any damage which you sustain as a result of software viruses. You should carry out your own virus checks before opening any attachment.

Registered in England No: 2938266 - Registered Office: Unit 2, Chartwell Road, Lancing Business Park, Lancing, West Sussex, BN15 8TU. - Rabbit Skips is a trading name of Sussex Waste Recycling Ltd.

Comment

Consultee ms alison dunbar-dempsey 01323400040
Email Address [REDACTED]
Company / Organisation Halvington with Hipe Parish Council
Address Hippi Cottage
 The Street
 Lewes
 BN9 5DQ
Event Name Send us your comments on main modification consultation
Comment by Halvington with Hipe Parish Council Ms Alison Dunbar-Dempsey
Comment ID W000000
Response Date 01/02/2020
Status Submitted
Submission Type Web
Version 0.0

Name and Address

Please provide your full name and contact address including postcode.

Alison Dunbar-Dempsey Hippi Cottage Hipe Lewes East Sussex BN9 5AP

Email address

Please provide a contact email address

[REDACTED]

I am writing as

on behalf of a company or organisation

Organisation

Halvington with Hipe Parish Council

Position

parish councillor

Submit your comments

Alternatively you may type your comments in here.

We are concerned about the insertion of the policy 'presumption in favour of sustainable development' as it can seemingly be interpreted in an infinite number of ways and could for example be used by waste companies to manipulate the planning system to maximise their profits to the detriment of rural areas. Moreover the joint goals which are inherent in the policy of promoting social, economic and environmental development may be at odds in conflict with each other and the policy gives no clear guidance as to how to resolve these conflicts. If it is included in the Plan then we would want reassurance that the overriding policy relating to any waste development is that of the waste hierarchy. We have already indicated our complete agreement with the waste hierarchy. We would object vehemently to any mention of landraise on greenfield sites seeping back into the plan as a result of the insertion of this policy.

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on behalf of a company or organisation

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chalvington with ripe parish council

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parish councillor

Submit your comments

Alternatively you may type your comments in here.

We are concerned about the insertion of the policy 'presumption in favour of sustainable development' as it can seemingly be interpreted in an infinite number of ways and could for example be used by waste companies to manipulate the planning system to maximise their profits to the detriment of rural areas. Moreover the joint goals 'which are inherent in the policy' of promoting social, economic and environmental development may be at odds 'in conflict with each other and the policy gives no clear guidance as to how to resolve these conflicts. If it is included in the Plan then we would want reassurance that the overriding policy relating to any waste development is that of the waste hierarchy. We have already indicated our complete agreement with the waste hierarchy. We would object vehemently to any mention of landraise on greenfield sites seeping back into the plan as a result of the insertion of this policy.

Mr Ian Blake
East Sussex County Council
Minerals and Waste Policy
County Hall St. Annes Crescent
Lewes
East Sussex
BN7 1UE

Our ref: HA/2011/112156/CS-
02/SB1-L02
Your ref: Waste and Minerals DF
Date: 07 November 2012

Dear Ian

EAST SUSSEX, SOUTH DOWNS AND BRIGHTON & HOVE WASTE AND MINERALS PLAN CONSULTATION ON MAIN MODIFICATION

Thank you for the opportunity to comment on the main modification.

We support the inclusion of the second bullet point and footnote in relation to Policy WMP 1 which makes specific reference to national and European designated sites and flood risk constraints which may restrict development.

If you have any queries or wish to discuss our response please contact me.

Yours sincerely

Catherine McLeod
Senior Planning Advisor
Environment Agency

Direct dial 01903 703858

Direct e-mail 

Comment

Consultee Mr John Lister (707407)

Email Address [REDACTED]

Company / Organisation Natural England

Address Unknown
Unknown
Unknown

Event Name Send us your comments (Main Modification consultation)

Comment by Natural England (Mr John Lister)

Comment ID WMMC10

Response Date 09/11/12 10:50

Status Submitted

Submission Type Letter

Version 0.2

Files WMMC10A.pdf

I am writing as

on behalf of a company or organisation

Organisation

Natural England

Send us your comments

If you have completed your comments outside of the survey, please upload them here.

[WMMC10A.pdf](#)

Matthew Breeze

From: Lister, John (NE) [REDACTED]
Sent: 08 November 2012 16:08
To: Waste and Minerals DF
Subject: 66930 - Waste and Minerals Plan - Main Modification
Follow Up Flag: Follow up
Flag Status: Blue

Dear Planning Team

Thank you for consulting Natural England on the Main Modification to your plan.

The inclusion of the presumption in favour of development (policy WMP1) and the Footnote which exempts land within a National Park, an Area of Outstanding Natural Beauty; sites protected under the Birds and Habitats Directives and/or as Sites of Special Scientific Interest; designated heritage

assets; and locations at risk of flooding or coastal erosion; are welcomed

Yours sincerely

John Lister

Lead Adviser

Land Use Services Team - Ashford

Natural England

Mobile - 0790 060 8172

www.naturalengland.org.uk

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09/11/2012

Comment

Consultee	Ms Irina Davis (707413)
Email Address	[REDACTED]
Company / Organisation	Suffolk County Council
Address	Development Section Endeavour House Ipswich IP1 2BX
Event Name	Send us your comments (Main Modification consultation)
Comment by	Suffolk County Council (Ms Irina Davis)
Comment ID	WMMC11
Response Date	09/11/12 11:07
Status	Submitted
Submission Type	Letter
Version	0.3
Files	WMMC11A.pdf
I am writing as	
	on behalf of a company or organisation
Organisation	
	Suffolk County Council

Send us your comments

If you have completed your comments outside of the survey, please upload them here.

[WMMC11A.pdf](#)

Matthew Breeze

From: Irina Davis [REDACTED]
Sent: 09 November 2012 10:45
To: Waste and Minerals DF
Subject: Consultation on Notice of Publication of a Proposed Main Modification to the Waste and Minerals Plan

Follow Up Flag: Follow up

Flag Status: Blue

Dear Sir/Madame

Thank you for your letter at 12 October 2012 regarding Consultation of Main Modification to the Waste and Minerals Plan. After careful review of your documents we would like to notify you that we do not have any comments relating to the above documents.

Yours sincerely
Irina Davis

Irina Davis
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