

**Proposed Councils’ Response to the Inspector’s Report
Part One: List of Modifications**

**(NB. Reasons for modifications are set out in ‘Part Two: Proposed Councils’
Response to the Inspector’s Report with Reasons’)**

Please note: Throughout the Proposed Modifications Draft Plan paragraph numbers have been updated accordingly. This document refers only to the original paragraph numbers that appear in the Second Deposit Plan which are the numbers that are crossed through in the Proposed Modification Draft. Footnote references have also been amended so they are sequential in the Plan.

Chapter 1: Waste Local Plan and its context (see pages 1-3 of the Inspectors Report)	
Modification ref.	Proposed Councils’ Modifications:
1/1	Header, Delete “Second Deposit” and replace with “Proposed Modifications”.
1/2	Delete paragraphs 1.2 - 1.4 and replace with the following: 1.2 The Proposed Modifications Draft Waste Local Plan has been prepared jointly by East Sussex County Council and Brighton & Hove City Council. Both Councils have responsibilities as Waste Planning Authorities (WPAs). The Plan covers the period to 2015. This is a draft document that can undergo revisions up until the point of adoption and it will be subject to review thereafter. 1.3. The purpose of publishing this Proposed Modifications Draft Waste Local Plan is to seek views about amendments made in response to recommendations made in the Inspectors Report following the Public Inquiry into representations to the First and Second Deposit Waste Local Plan. The six week period for the receipt of comments on the Proposed Modifications Deposit Plan lasts from 11 February to 25 March 2005. If you want to comment on the Plan, details of how to do this are set out at the beginning of the document. 1.4 All comments on the Plan: <ul style="list-style-type: none"> • must be in writing (including e-mail); • should use the form accompanying this document; • must be received at the correct address by mid-day on Friday 25 March 2005 if they are to be considered by the Councils (comments received after the closing time and date cannot be considered)- ; and • can only relate to proposed modifications, or to the Councils’ decision to reject particular recommendations made by the Inspector.
1/3	Para 1.6, Insert new bullet point in preceding “structure Plan”. Regional Spatial Strategy (RSS) - Former Regional Planning Guidance 9 has now become RSS on commencement of the Planning and Compulsory Purchase Act 2004. Revisions of RSS are currently being prepared.
1/4	Para 1.6, Insert at end of Structure Plan bullet point, ‘saved document until revision of Regional Spatial Strategy approved.’
1/5	Para 1.10, fourth sentence delete ‘regional planning guidance’.
1/6	Delete paragraphs 1.15 – 1.18 and replace with the following: 1.15 The First Deposit Plan was prepared following the publication by the WPAs of a Consultation Draft Waste Local Plan in December 1998. The earlier draft was published to raise awareness of the waste issues facing the Plan area and to allow the local community, businesses, the waste industry and statutory Consultees the opportunity to comment on a wide range of initial proposals and to influence the content of the Plan. Following public consultation on the First Deposit, a Second Deposit Plan was published in April 2002.

Chapter 1: Waste Local Plan and its context
(see pages 1-3 of the Inspectors Report)

- 1.16 Following consultation on the First and Second Deposit Plans and in accordance with the regulations¹ the WPAs have published a Proposed Modifications Deposit Plan. This modifies the Plan in Response to recommendations made by the Inspector following a Public Inquiry which sat for 31 days between 13 May 2003 and 24 October 2003. The amended Plan will be the subject of a further six week consultation period. Only representations made in respect of the modifications proposed, or to the Councils decision to reject particular recommendations made by the Inspector, can be taken into account at this stage. A Schedule of Inspectors' Recommendations and Proposed Modifications is published alongside this Plan which sets out which Inspector's Recommendations the Councils accept or reject.
- 1.17 Further details of this process and the timetable for representations are at the front of this document. The former Department for the Environment, Transport and the Regions also produced a booklet called "Local Plans and Unitary Development Plans – A Guide To Procedures" which explains the process in more detail. Copies of this booklet can be obtained from the Councils.
- 1.18 The current timetable for the preparation of the Plan is set out in Table 1.1 below.

Table 1.1 Plan Preparation Procedure

STAGE	TIMETABLE	
Publication of Consultation Draft	9 th December 1998	
Closing date for comments	5 th February 1999	
First Deposit Plan publication	1 st November 2000	
Closing date for Deposit comments	12 th December 2000	
Second Deposit Plan Publication	3 rd April 2002 ^[1/27]	
Closing date for comments	14 th May 2002 ^[1/28]	
Public Inquiry	May – October 2003	
Inspector's report	June 2004	
Proposed Modifications	February 2005	
NEXT STAGES:	PROVISIONAL TIMETABLE:	
Adopted Plan	Spring 2006	

Chapter 2: The Legislative and Policy Framework
(See Pages 4 to 11 of the Inspector's Report)

Modification ref.	Proposed Councils' Modifications:
2/1	Paragraph 2.1: lines 2-3, delete "although a significant proportion of the waste could be recovered, including through increased recycling."
2/2	Paragraph 2.1: Delete footnote 2
2/3	Paragraph 2.1 First bullet point, delete "2005 and 2007" and substitute "2006 and 2008"
2/4	Paragraph 2.5 under "Waste Regulation", last line, delete "a Background Paper" and substitute "Background Paper 6".
2/5	Paragraph 2.7: line 1, delete "European Union policy on waste focuses" and substitute with: "The basis for European Union policy on waste management is the Waste

Chapter 2: The Legislative and Policy Framework (See Pages 4 to 11 of the Inspector's Report)	
	Framework Directive (75/442/EEC as amended), which sets objectives for the management of waste. These have been transposed into UK legislation via the Waste Management Licensing Regulations 1994. The waste planning authorities are 'competent authorities' for the purposes of these objectives. More recently, the focus has been..."
2/6	Insert the following text after paragraph 2.7: Other Directives which may be relevant to waste planning are listed in Appendix 2. More Directives are in the course of preparation. Emerging Directives cannot be taken into account in this Plan when their final form is unknown. They will however, be a material consideration once they have been adopted, and will be incorporated into future reviews of this Plan."
2/7	Para 2.11, Insert at beginning. The Planning and Compulsory Purchase Act 2004 introduced a new planning system. Local Plans can be completed if they have already reached a certain stage. Regional Spatial Strategy becomes part of the Development Plan and Local Planning Authorities have to now prepare Local Development Frameworks.
2/8	Para 2.11, 3 rd line after (PPGS) insert 'Planning Policy Statements (PPSs)'.
2/9	Para 2.11, last line, after PPGs insert '/PPSs'
2/10	Para 2.11, delete second bullet point and replace with 'Sustainable Development in Rural Areas (PPS 7)'
2/11	Para 2.11, Delete fourth bullet point and replace with 'Local Development Frameworks (PPS 12)'
2/12	Para 2.11, sixth bullet point, delete PPG 23 and replace with PPS 23.
2/13	Delete Paragraphs 2.11 to 2.13 and replace with the following: 2.12 The regional planning function for the Plan area is the responsibility of the South East Regional Assembly (SEERA). The South East Regional Technical Advisory Body (SERTAB) – the regional body on waste - advises SEERA on waste matters and has been involved in the production of the Draft Regional Waste Management Strategy and Regional Planning Guidance for the South East (RPG9). Relevant guidance on the responsibilities of regional technical advisory bodies is set out in paragraphs 11 and 17, and in Annex B, of PPG10. 2.13 The draft Regional Waste Management Strategy has been submitted to Government as an alteration to RPG9 (which is now the Regional Spatial Strategy). This document advocates regional self-sufficiency in terms of waste management. It is intended that the alteration to Regional Spatial Strategy will be adopted sometime in 2005.
2/14	Para 2.15, line 5, insert 'and' between European, national and delete and regional.
2/15	Insert at beginning of para 2.16. In accordance with section 38 of the Planning and Compulsory Purchase Act 2004 the development plan comprises Regional Spatial Strategy and local plan documents including the adopted Mineral Local Plan and the adopted Borough And District Local Plans.
2/16	Para 2.16, first line. Insert 'also' between area and comprises.

Chapter 2: The Legislative and Policy Framework (See Pages 4 to 11 of the Inspector’s Report)	
2/17	Para 2.16, first and second line, delete the adopted...district local plans.
2/18	Paragraph 2.24, last 2 lines: delete “these would be balanced by” and substitute “there will also be”
2/19	Paragraph 2.25: add to end, “Within the hierarchy, the Government does not expect incineration with energy recovery to be considered before the opportunities for recycling and composting have been explored”.
2/20	Delete footnote 15
2/21	Delete paragraph 2.27
2/22	Paragraph 2.29: add to end: “for the Waste Local Plan Inquiry, the Councils commissioned a BPEO assessment for managing the principal waste streams arising in the Plan area (Background Paper 7). This has informed both the evolution of this Plan and work towards the waste disposal authorities’ Municipal Waste Management Strategy, to be produced in partnership with the waste collection authorities.”
2/23	Paragraph 2.20A: Insert heading ‘Precautionary Principle’ before paragraph 2.29A
2/24	Paragraph 2.29A: Last paragraph delete “there is no need to incorporate it into the Waste Local Plan policies since it is already” and replace with “it is”.
2/25	Paragraph 2.29A: delete “it is a key consideration” and substitute “it is included in this Plan as a key principle”.

Chapter 3: Waste Facilities (See Pages 11 to 19 of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
3/1	Paragraph 3.1, insert at end: “However there is potential overlap between these categories, with some types of facility having the characteristics of more than one technique”.
3/2	Paragraph 3.3, delete on last line “which have little or no land use implications”, and substitute: “Nevertheless, where waste reduction is capable of being influenced by the Plan, the waste planning authorities will support all measures to promote it. These may include development proposals which minimise the generation of waste; public support for waste minimisation initiatives by other bodies and individuals; and an examination of how the Councils may themselves set an example. See also paragraphs 6.31-6.34 and policies WLP11 and WLP12 below”.
3/3	After paragraph 3.14, insert new sub-heading “Mechanical-Biological Treatment” and add new paragraph: “Mechanical-biological treatment (MBT) plants are new to this country but there is some experience of them in other countries for managing municipal waste. In their simplest form they are essentially a combination of a MRF with a composting or anaerobic digestion facility (see below). More sophisticated designs enable the processes to be integrated, with modern odour controls, higher quality residues and energy recovery. An important asset of such plants is their flexibility of format. They can be small or large-scale, or modular so as to be able to respond to fluctuations in input. They can accept mixed household or commercial and industrial waste, in which case the residues are likely to go to landfill or thermal treatment facility or be used to produce waste-derived fuel. Or they can accept kerbside or industrial/commercial separated waste streams, giving higher potential for retrieving recyclable materials and obtaining usable compost from biodegradable waste.”

Chapter 3: Waste Facilities (See Pages 11 to 19 of the Inspector’s Report)	
3/4	Paragraph 3.25: delete the text of amendment 3/6 and substitute: “Composting has important benefits in re-using biodegradable waste and improving soil condition. However there are significant potential health and environmental concerns which must be addressed. These are covered by the Animal By-Products Regulations 2003 which stipulate the standards to be applied, particularly in composting catering waste. Home composting is exempt unless livestock are kept, although householders are advised not to compost meat. Green waste (from parks and gardens) is exempt provided it is not mixed with catering waste. Application of these standards will ensure that properly regulated composting can achieve its beneficial purposes.”
3/5	Paragraph 3.33, delete second sentence (“The technologies... gases are generated”) and substitute “The technologies available include anaerobic digestion (where energy is recovered from the gases generated) and thermal treatment methods such as incineration, gasification and pyrolysis.”
3/6	Paragraph 3.40 delete heading “Issues” and substitute heading “Incineration”.
3/7	Insert paragraphs 3.40-3.42 as paragraphs 3.37, 3.38 and 3.39.
3/8	Paragraph 3.37 line 1 delete “Incineration” where it first occurs.
3/9	Paragraph 3.37 delete ‘as received’ ” from line 3. (Text then continues with paragraph 3.34).
3/10	Paragraph 3.35: line 1, put “Emissions” in bold type.
3/11	Paragraph 3.35: delete first two sentences and substitute “The control of emissions is a major concern with incineration.”
3/12	Paragraph 3.35: line 4, delete “EfW facilities” and substitute “incinerators”.
3/13	Paragraph 3.36, after “Most proposals for” insert “incineration and other”.
3/14	Paragraph 3.37: line 1, delete first occurrence of “EfW” and substitute “incineration”.
3/15	Paragraph 3.37: line 1, delete second occurrence of “EfW” and substitute “incineration”.
3/16	Paragraph 3.37: line 5, delete “any EfW” and substitute “incineration or other thermal treatment”.
3/17	Paragraph 3.37: Line 7 delete “EfW” and substitute “incineration”.
3/18	Line 10 delete “EfW” and substitute “anaerobic digestion, thermal treatment”.
3/19	Paragraph 3.38: line 3, after “process produces” insert “a burnt residue or”.
3/20	Paragraph 3.38: delete “which is inert”.
3/21	Paragraph 3.38: delete last sentence and substitute “Fly ash is classed as special waste and will only be acceptable for disposal at suitable landfill sites.”
3/22	Delete heading “Facilities” after paragraph 3.38.
3/23	Delete paragraph 3.39, 3.40, 3.41, 3.42.

Chapter 3: Waste Facilities (See Pages 11 to 19 of the Inspector’s Report)	
3/24	Insert heading “Other thermal treatment” before paragraph 3.43.
3/25	Insert heading “Waste Derived Fuel (WDF)” to precede paragraph 3.45
3/26	Insert heading “Anaerobic Digestion” to follow paragraph old Paragraph 3.45
3/27	Insert paragraph 3.39 as new paragraph 3.48
3/28	In new paragraph 3.48 delete “In-vessel composting/” from line 1.
3/29	In new paragraph 3.48 delete “In-vessel composting or” from line 1.
3/30	Paragraph 3.53, line 9, delete “bonded asbestos” and substitute “vegetable matter”.
3/31	Paragraph 3.54, line 6, insert “Even so,” before “it is evident”.

Chapter 4: Existing Waste Management in the Plan Area. (See Pages 19 to 27 of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
4/1	Para 4.3, sixth line. Delete ‘recent.’
4/2	Para 4.3, After footnote 24 insert, ‘It is expected that the informal consultation draft of the South East Plan (which will be a revision to Regional Spatial Strategy which will update RPG) will contain options for the South East up to 36,000 new dwellings per year. ‘
4/3	Paragraph 4.4. Delete last two sentences and replace with “East Sussex and Brighton & Hove have a number of areas designated as internationally important for wildlife under the European Habitats Directive 1992, Birds Directive 1979 and the Ramsar Convention. These include the Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and one Ramsar site. There are also currently two potential Ramsar sites. There are 68 nationally important Sites of Special Scientific Interest (SSSIs) and other areas that are locally important Sites of Nature Conservation Importance (SNCIs) and Regionally Important Geological sites. There are four National Nature Reserves and 17 Local Nature Reserves. Throughout the plan area protected species occur outside designated areas (eg Bats, Great Crested Newts and Badgers).”
4/4	Paragraph 4.11. Last line: delete “a” before Background,
4/5	Paragraph 4.11 last line insert “4” after “Paper”.
4/6	Table 4.2: under Category E, line 4, delete “e.g.”.
4/7	Paragraph 4.18. Delete all after “per year” on line 2 and substitute: “If no action is taken, the generation of municipal waste is expected to increase in future years due to an increasing population and number of households, economic growth and changing lifestyle factors”
4/8	Paragraph 4.19. Delete 240 – 365,000 and replace with 245 – 361,000.
4/9	Table 4.3: Insert new column: 2001/02

Chapter 4: Existing Waste Management in the Plan Area. (See Pages 19 to 27 of the Inspector's Report)					
	<table border="1"> <tr><td>378,000</td></tr> <tr><td>355,000</td></tr> <tr><td>49,000</td></tr> <tr><td>782,000</td></tr> </table>	378,000	355,000	49,000	782,000
378,000					
355,000					
49,000					
782,000					
4/10	Paragraph 4.27. Last line, delete "between 2005 and 2007" and substitute "by 2008".				
4/11	Paragraph 4.28. Last line, delete "2005" and substitute "2008".				
4/12	Table 4.4. Delete '2000' in the title and replace with "2001".				
4/13	Para 4.37, fourth line. Insert and between rye, Uckfield and delete 'Crowborough'.				
4/14	Paragraph 4.38. Seventh line, delete "Longleys Farm in Hailsham".				

Chapter 5: Targets for Recovery of Waste and Distribution of Facilities (See Pages 27 to 59 of the Inspector's Report)	
Modification ref.	Proposed Councils' Modifications:
5/1	Paragraph 5.8: line 3, delete "...that the majority of municipal waste and some commercial..." and substitute "that some municipal, commercial...".
5/2	Paragraph 5.8: 4 th sentence, delete reference to policy '9/1'.
5/3	Delete amendment 5/9.
5/4	Paragraph 5.14, line 1, delete 'Municipal' and replace with "Municipal".
5/5	Table 5.2: Delete 2003 target reference in first row.
5/6	Paragraph 5.16. Delete last sentence ("In East Sussex...to 20%") and substitute the text of amendment 5/9.
5/7	Paragraph 5.19: Delete reference to '630,000 to 750,000' and replace with '660,000 and 790,000'
5/8	Paragraph 5.20: Delete reference to '376,000 tonnes for 2000/01' and replace with 'approximately 385,000 tonnes in 2003/04'.
5/9	Paragraph 5.20. Line 5, delete "It is anticipated" and substitute "the Plan assumes".
5/10	Paragraph 5.20. Last sentence: insert "On this basis" before "arisings".
5/11	Paragraph 5.20, last sentence, delete "will therefore" and substitute "would".
5/12	Paragraph 5.20: Last sentence, delete '450,000' and insert '440,000'.
5/13	Paragraph 5.20. Add at end of paragraph: "Success in waste minimisation and re-use may reduce or even reverse this growth, but it is important to make adequate provision. Trends will be monitored for the Plan review."
5/14	Delete paragraphs 5.21-5.22 and Figure 5.1
5/15	Paragraph 5.23. Add to end: "The Plan will also encourage smaller-scale facilities at suitable locations. These can be more locally based, quicker to provide, and more

Chapter 5: Targets for Recovery of Waste and Distribution of Facilities (See Pages 27 to 59 of the Inspector's Report)	
	flexible in terms of size and location of site".
5/16	Paragraph 5.24. Line 1, delete "At present the WDF plant at Pebsham recovers...drying" and substitute "When operational, the WDF plant at Pebsham recovers around 4% of household waste each year by drying...".
5/17	Paragraph 5.24. Delete from "when the existing contract...plant could continue" and substitute "under the existing contract. Further treatment at this plant could continue under the terms of the existing lease and planning permission".
5/18	Paragraph 5.24. Add to end of paragraph: "Smaller scale facilities have the potential to make a more immediate contribution if suitable sites come forward."
5/19	Paragraph 5.25. Delete existing text and substitute: "Overall, increased recycling and recovery will be gradual and are expected to achieve a steady and significant increase in diversion of waste from disposal to land during the Plan period. There will remain a requirement for disposal to land for most waste streams for the foreseeable future, but increasingly this will comprise pre-treated waste, the residues of treatment processes and some inert waste."
5/20	Paragraph 5.26. Line 2, insert "subject to that" after "but".
5/21	Paragraph 5.26: Add to end of paragraph: "Separate collection of recyclable and biodegradable waste streams would increase recovery rates."
5/22	Paragraph 5.29. 1 st bullet point delete '376,000 tonnes in 2000/01' and insert 'approximately 385,000 tonnes in 2003/04'.
5/23	Paragraph 5.29. 4 th bullet point, insert "at least" after "until".
5/24	Update Figure 5.2 to reflect the new data and corrected figures in Background Paper 1, Table 9, Scenario 1.
5/25	Paragraph 5.30. First sentence, insert "and exceed" after "achieve".
5/26	Paragraph 5.30, delete "as a minimum but will aim for higher aspirational targets".
5/27	Paragraph 5.30. Add to end of paragraph: "All those involved in the planning process must be committed to promoting the facilities required to meet the selected targets".
5/28	Paragraph 5.31. Line 2, insert after "recycled material", "in accordance with the key principles stated in chapter 2".
5/29	Paragraph 5.31. Lines 4-5, delete "are beyond the scope...local authorities" (including PC18 which said: after 'authorities' add "other than in their own purchasing decisions") and substitute "cannot be controlled directly by the Plan".
5/30	Paragraph 5.31. Add to end of paragraph: "All of us has a part to play".
5/31	Paragraph 5.32. Delete all after first sentence and substitute: "Scenario 2 aims to bring forward the Government's 2015 recycling target of 33% to 2010 so that an overall recycling (including composting) target of 40% can be reached by 2015. Scenario 3 aims to achieve higher recycling and other recovery targets. These are similar to those in the (draft) regional waste management strategy. The targets apply to all municipal waste, not just household waste."

Chapter 5: Targets for Recovery of Waste and Distribution of Facilities (See Pages 27 to 59 of the Inspector’s Report)																			
5/32	Paragraph 5.33. Delete first sentence.																		
5/33	Paragraph 5.33: Fourth line, delete reference to ‘municipal’ and replace with ‘household’.																		
5/34	Paragraph 5.33. Line 6, delete “EfW facilities” and substitute “other materials and energy recovery”.																		
5/35	Paragraph 5.33. Last line, after “67%” insert “(including 40% recycling/ composting)”.																		
5/36	Paragraph 5.33. Add to end of paragraph: “In achieving recovery targets beyond those for recycling/composting, materials recovery processes will be preferred to energy recovery.”																		
5/37	<p>Table 5.3. Insert new table:</p> <p style="text-align: center;"><i>Table 5.3: Aspirational Plan targets for municipal waste – Scenario 2</i></p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Aspirational targets for municipal waste: Scenario 2</th> <th>Recycling and Composting (household waste)</th> <th>Recycling and Composting (municipal waste)</th> <th>Other materials and energy recovery (municipal waste)</th> <th>Total recovery (municipal waste)</th> <th>Disposal to land (municipal waste)</th> </tr> </thead> <tbody> <tr> <td>2010</td> <td>33%</td> <td>31.4%</td> <td>18.6%</td> <td>50%</td> <td>50%</td> </tr> <tr> <td>2015</td> <td>40%</td> <td>38%</td> <td>29%</td> <td>67%</td> <td>33%</td> </tr> </tbody> </table>	Aspirational targets for municipal waste: Scenario 2	Recycling and Composting (household waste)	Recycling and Composting (municipal waste)	Other materials and energy recovery (municipal waste)	Total recovery (municipal waste)	Disposal to land (municipal waste)	2010	33%	31.4%	18.6%	50%	50%	2015	40%	38%	29%	67%	33%
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2010	33%	31.4%	18.6%	50%	50%														
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5/38	Table 5.3. After new Table 5.3 insert sentence: “Municipal waste includes 95% of the household waste”.																		
5/39	Paragraph 5.34 amend first word to read ‘Figure’																		
5/40	Paragraph 5.34. 1 st bullet point replace ‘376,000 tonnes in 2000/01’ with ‘approximately 385,000 tonnes in 2003/04’.																		
5/41	Paragraph 5.34. 4 th bullet point, insert “at least” after “until”.																		
5/42	Update Figure 5.3 to reflect the new data and corrected figures in Background Paper 1, Table 10, Scenario 2.																		
5/43	Paragraph 5.34A. Delete paragraph.																		
5/44	Paragraph 5.35. Delete 2nd sentence and substitute: “These higher recovery rates are only likely to be achieved by separating waste collection streams and the re-use or recycling of residues from MBT, anaerobic digestion and EfW processes, where safe to do so.”																		
5/45	Paragraph 5.35. Add to end of paragraph: “As with scenario 2, materials recovery processes would be preferred to energy recovery.”																		
5/46	Table 5.4. Insert new table:																		

Chapter 5: Targets for Recovery of Waste and Distribution of Facilities (See Pages 27 to 59 of the Inspector’s Report)																			
	<p><i>Table 5.4: Increased recovery targets for municipal waste – Scenario 3</i></p> <table border="1"> <thead> <tr> <th>Aspirational targets for municipal waste: Scenario 3</th> <th>Recycling and Composting (household waste)</th> <th>Recycling and Composting (municipal waste)</th> <th>Other materials and energy recovery (municipal waste)</th> <th>Total recovery (municipal waste)</th> <th>Disposal to land (municipal waste)</th> </tr> </thead> <tbody> <tr> <td>2010</td> <td>33%</td> <td>31.4%</td> <td>35.6%</td> <td>67%</td> <td>33%</td> </tr> <tr> <td>2015</td> <td>40%</td> <td>38%</td> <td>42%</td> <td>80%</td> <td>20%</td> </tr> </tbody> </table>	Aspirational targets for municipal waste: Scenario 3	Recycling and Composting (household waste)	Recycling and Composting (municipal waste)	Other materials and energy recovery (municipal waste)	Total recovery (municipal waste)	Disposal to land (municipal waste)	2010	33%	31.4%	35.6%	67%	33%	2015	40%	38%	42%	80%	20%
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5/47	Table 5.4. After new Table 5.4 insert sentence: “Municipal waste includes 95% of the household waste”.																		
5/48	Paragraph 5.36. 1 st bullet point delete ‘376,000 tonnes in 2000/01’ and insert ‘approximately 385,000 tonnes in 2003/04’.																		
5/49	Paragraph 5.36. 4 th bullet point, insert “at least” after “until”.																		
5/50	Update Figure 5.3 to reflect the new data and corrected figures in Background Paper 1, Table 11, Scenario 3.																		
5/51	Insert Paragraphs 5.21, 5.22 and figure 5.1 after 5.35.																		
5/52	Paragraph 5.21 (new para 5.36) . Line 3 after “in recent years” insert “and perhaps more”.																		
5/53	Paragraph 5.22 (new para 5.37). Delete first sentence and substitute: “Figure 5.1 shows projected arisings of all non-inert waste until 2015.”																		
5/54	Paragraph 5.22 (new para 5.37) Delete from “in 2000/01 there were 376,000.....average of 0.7% to 400,000 tonnes by 2015” and replace with “Future waste growth is difficult to predict with any great degree of accuracy and these projections should only be accepted as an indication of future waste growth”.																		
5/55	Re-name Figure 5.1 as Figure 5.4a.																		
5/56	In title of new figure 5.5 delete ‘2001’ with ‘2003’.																		
5/57	Figure 5.5: Modified to reflect updated C&I data in line with Background Paper 1, Table 13.																		
5/59	<p>After paragraph 5.39 & figure 5.5, insert new heading “Selection of Plan Strategy for Waste Recovery” and add new text and table:</p> <p>“5.40. The Plan aims to divert waste away from landfill to alternative methods of material and energy recovery further up the waste hierarchy. This will achieve the Government targets and go beyond them with the objectives of a sustainable waste management strategy and reducing to a minimum the need for additional landfill capacity. At the same time, if the Plan is too ambitious in its targets or the targets are not pursued vigorously enough by all concerned, there is a greater risk that the aim of Plan area net self-sufficiency will not be attained or further landfill capacity will be required.</p>																		

Chapter 5: Targets for Recovery of Waste and Distribution of Facilities (See Pages 27 to 59 of the Inspector's Report)																			
	<p>"5.41. It is considered that the best balance for municipal waste would be achieved by adopting the targets set out in table 5.6. These are derived from scenario 2 and are considered to be the optimum that could practicably be attained (although further increases would be supported). For commercial and industrial waste, the targets are those set out in paragraph 5.39. For all non-inert waste streams, the Plan will allocate sites and set in place policies which will enable these targets to be achieved and, if possible, exceeded.</p> <p style="text-align: center;">"Table 5.6: Plan Strategy for Waste Recovery</p> <table border="1"> <thead> <tr> <th></th> <th></th> <th>2010</th> <th>2015</th> </tr> </thead> <tbody> <tr> <td>Household waste</td> <td>Recycling/Composting</td> <td>33%</td> <td>40%</td> </tr> <tr> <td rowspan="3">Municipal waste</td> <td>Recycling/Composting</td> <td>31.4%</td> <td>38%</td> </tr> <tr> <td>Other recovery</td> <td>18.6%</td> <td>29%</td> </tr> <tr> <td>Disposal to land</td> <td>50%</td> <td>33%</td> </tr> </tbody> </table> <p>"5.42 Background Paper 1: The Strategy has been revised with the most recent available data, and details the calculations for the municipal and commercial & industrial waste scenarios as represented in Figures 5.3, 5.4, 5.5 and 5.6 in this chapter. Background Paper 1 should be referred to for more detailed analysis of this data showing the total waste arising and the quantities recycled, otherwise recovered and landfilled.</p>			2010	2015	Household waste	Recycling/Composting	33%	40%	Municipal waste	Recycling/Composting	31.4%	38%	Other recovery	18.6%	29%	Disposal to land	50%	33%
		2010	2015																
Household waste	Recycling/Composting	33%	40%																
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	Disposal to land	50%	33%																
5/60	Paragraph 5.41. 1 st bullet point, delete '376,000 tonnes in 2000/01' and substitute 'approximately 385,000 tonnes in 2003/04'.																		
5/61	Paragraph 5.41. 2 nd bullet point, delete '360,000 tonnes in 2000/01' and substitute 'approximately 355,000 tonnes in 2003/04'.																		
5/62	Update Figure 5.6 to reflect the new data and corrected figures in Background Paper 1, Tables 10 and 13.																		
5/63	Figure 5.6/1. Delete figure.																		
5/64	Delete paragraph 5.42 and substitute: "Provided targets for recycling and other means of recovery and corresponding rates of diversion from landfill are achieved (as set out in table 5.5A) it is estimated that around 7.75 million cubic metres (mcm) of void space for land disposal will be needed over the Plan period (to 2015/16). Capacity in 2001/02 amounted to approximately 2.7 mcm. It is therefore estimated that 5 mcm extra capacity for non-inert waste will be required over the Plan period.																		
5/65	Delete "Strategic" from the headings preceding paragraphs 5.49 and 5.53.																		
5/66	Paragraph 5.51. Line 1, insert "composting" after "recycling".																		
5/67	Paragraph 5.51 After "These facilities will", insert "have the capacity to".																		
5/68	Paragraph 5.51. Lines 5-6, delete "By concentrating on strategic sites it is hoped, wherever possible," and substitute "At strategic sites it will be possible".																		
5/69	Paragraph 5.51. Insert at end of paragraph "The Plan also provides for smaller-scale facilities to serve local communities and businesses".																		
5/70	Paragraph 5.56. Penultimate line, delete 'should' and replace with 'may'.																		
5/71	Paragraph 5.57. Line 3, delete "EfW facilities" and substitute "Larger scale materials recovery or EfW facilities would".																		

Chapter 5: Targets for Recovery of Waste and Distribution of Facilities (See Pages 27 to 59 of the Inspector’s Report)	
5/72	Paragraph 5.57. Line 6, delete “one EfW plant” and substitute “a single large plant”.
5/73	Paragraph 5.57. Delete last two sentences (“The plant...is created”) and substitute: “It would also not encourage more local provision of facilities in accordance with the proximity principle and the waste hierarchy. The Plan’s preferred approach is to identify a number of locations across the Plan area where a range of facilities might be sited in order to meet strategic requirements, supported by smaller-scale facilities at other locations”.
5/74	Delete paragraph 5.58 and table 5.8.
5/75	Delete paragraph 5.59 and substitute text: “Sites for waste management facilities which will manage a sizeable proportion of the waste stream have been identified in central Brighton (Hollingdean Depot/Abattoir), on the urban fringe of Hove (Hangleton Bottom) and at North Quay, Newhaven to serve the western part of the Plan area. Smaller-scale facilities might also be accommodated at the Sackville Trading Estate site, Hove in connection with road/rail transfer facilities. A site to serve the central coastal area has been identified at Tutts Barn, Eastbourne. A site including and adjacent to the existing MRF at Bellbrook Industrial Estate, Uckfield is proposed to serve the needs of the north-west part of East Sussex. The eastern part of the Plan area will be served by the existing facility at Pebsham (although the landfill site there will close). Additional waste management sites are likely to be needed if the objective of net Plan area self-sufficiency is to be achieved. Pending this, proposals for appropriate facilities on suitable sites will be supported by the relevant criteria-based policies.”
5/76	Re-title existing paragraph 5.60 as 5.63. Delete existing paragraph 5.61 and insert new paragraph 5.62: “5.62 Not all the locations identified for waste management are likely to be suitable for thermal treatment plants (incineration, pyrolysis, gasification and similar technologies), because of the large size of plant often required, resulting in greater visual impact and traffic generation. There are also serious pollution concerns that need to be overcome. Although thermal treatment recovers energy it is destructive of material. The same is true of other forms of EfW facility e.g. anaerobic digestors. Alternative methods of waste management which recover material are therefore preferred. Nevertheless there may be a need for EfW facilities to be provided to deal with waste which cannot otherwise be managed except by landfill, to ensure that adequate waste management capacity is provided overall”.
5/77	Paragraph 5.62. Delete penultimate sentence and substitute “The existing land disposal sites at Beddingham and Pebsham should last until around 2006/7 and 2008 respectively”.
5/78	Paragraph 5.63. Delete all after “until” at line 4 and substitute “...later in the Plan period. There are also highway capacity and site access constraints and a new site access would need to be constructed to the north before waste disposal operations could commence. Even so, the infill rate to the site will be limited by the availability of the proposed Bexhill-Hastings Link road and a local highway connection to this, as well as the need to cater for further clay extraction from the quarry.”
5/79	Paragraph 5.64. Delete lines 1-12 (“Around 8.7...region of 1 mcm”) and substitute: “Around 7.75 million cubic metres (mcm) of landfill void need to be provided in the Plan area for non-inert waste in the period leading up to 2015/16. Capacity in 2001/02 amounted to approximately 2.7 mcm. It is anticipated that further limited landraising at Beddingham landfill (policy WLP10a) could offer about 0.8 mcm provided the effects

Chapter 5: Targets for Recovery of Waste and Distribution of Facilities (See Pages 27 to 59 of the Inspector’s Report)																					
	on the landscape and the adjoining Sites of Special Scientific Interest (SSSIs) are acceptable. The allocated site at Ashdown Brickworks (policy WLP10b) could probably start to contribute from 2008/9 onwards, provided constraints in respect of access can be overcome. About 0.7-1.4 mcm of void space is expected to be available from this site up to the end of the Plan period. The potential void is 4 mcm”.																				
5/80	Start a new paragraph 5.67 at “It is anticipated that the location of the remaining voidspace...” on line 12.																				
5/81	Paragraph 5.64A. First line. Insert “2.9 to 3.6 mcm of” before “voidspace”.																				
5/82	Paragraph 5.64. Delete the last two sentences (“Although there...where appropriate”) and substitute a new paragraph 5.64B: “The shortage of non-inert landfill capacity in the Plan area and the existing surplus of inert waste means that a site or sites for the disposal of a minimum of 1.8 mcm of inert waste may need to be found during the life of the Plan. Forthcoming applications will be considered in relation to Plan policies WLP23 and WLP24. Other disposal sites proposed for non-inert waste approved in relation to policies WLP20-21 may also accept inert waste for engineering and daily cover. Any other disposal needs will be met by the restoration of mineral voids and improvements to land, where appropriate.”																				
5/83	Paragraph 5.65. Line 1 on page 69, insert new text before “Other sites”: “In addition, the identified locations at Tutts Barn, Eastbourne and North Quay, Newhaven have the potential for rail access for bringing waste in and/or taking recyclables and residues out. The Newhaven site also has the potential for water access for these purposes”.																				
5/84	Paragraph 5.65. Delete the last sentence.																				
5/85	<p>After paragraph 5.65, insert new heading “Spatial requirements for waste management facilities”. Insert new text and table:</p> <p>“5.65A The locations identified from the above analysis are set out in table 5.8.</p> <p>“Table 5.8: Spatial requirements for principal waste facilities in the Plan area</p> <table border="1"> <thead> <tr> <th>Facilities</th> <th>Area of search</th> <th>Preferred location</th> </tr> </thead> <tbody> <tr> <td rowspan="5">Materials recycling, waste transfer</td> <td>Brighton/Hove</td> <td>Hollingdean Depot/Abattoir, Brighton Hangleton Bottom, Hove Sackville Trading Estate, Hove (limited scale)</td> </tr> <tr> <td>Lewes/Newhaven</td> <td>North Quay, Newhaven</td> </tr> <tr> <td>Eastbourne/Polegate/Hailsham</td> <td>Tutts Barn, Eastbourne</td> </tr> <tr> <td>Bexhill/Hastings/Battle</td> <td>Pebsham (existing facility)</td> </tr> <tr> <td>Uckfield/Crowborough</td> <td>Bellbrook Industrial Estate, Uckfield</td> </tr> <tr> <td>Road/rail transfer</td> <td>-</td> <td>Sackville Trading Estate, Hove</td> </tr> <tr> <td>Energy from Waste</td> <td>-</td> <td>North Quay, Newhaven</td> </tr> </tbody> </table>	Facilities	Area of search	Preferred location	Materials recycling, waste transfer	Brighton/Hove	Hollingdean Depot/Abattoir, Brighton Hangleton Bottom, Hove Sackville Trading Estate, Hove (limited scale)	Lewes/Newhaven	North Quay, Newhaven	Eastbourne/Polegate/Hailsham	Tutts Barn, Eastbourne	Bexhill/Hastings/Battle	Pebsham (existing facility)	Uckfield/Crowborough	Bellbrook Industrial Estate, Uckfield	Road/rail transfer	-	Sackville Trading Estate, Hove	Energy from Waste	-	North Quay, Newhaven
Facilities	Area of search	Preferred location																			
Materials recycling, waste transfer	Brighton/Hove	Hollingdean Depot/Abattoir, Brighton Hangleton Bottom, Hove Sackville Trading Estate, Hove (limited scale)																			
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Energy from Waste	-	North Quay, Newhaven																			

Chapter 5: Targets for Recovery of Waste and Distribution of Facilities (See Pages 27 to 59 of the Inspector’s Report)			
		Disposal to land	- Beddingham Ashdown Brickworks, Bexhill
	Paragraph 5.66. Delete text and substitute: “The Plan will also encourage the provision of smaller-scale waste management facilities where they can serve local communities and businesses in accordance with the proximity principle. Such facilities provide employment and are generally well suited to business parks, industrial estates and other locations identified for employment purposes in District Local Plans. They would be suitable at the strategic locations and additional locations identified in the Plan. Some facilities might also be acceptable at shopping centres or other centres of commercial activity. Small-scale composting activities could also be accommodated on farms. The provision of smaller-scale facilities at suitable locations not identified in the Plan will be supported through policies WLP13-19.”		

Paragraphs 6.3 - 6.4 and Policy WLP1: the Plan’s Strategy (See Pages 60 to 66 of the Inspectors Report)	
Modification ref.	Proposed Councils’ Modifications:
6/0	WLP1, delete first bullet point.
6/1	Paragraph 6.4: line 2, insert at end of first sentence, “having regard to the objectives of the Waste Framework Directive (see chapter 2)”.
6/2	Paragraph 6: 4Lines 36, delete “Whilst the targets...the need for...” and substitute “The criteria of policy WLP1 include the need for proposals to contribute to sustainable development and for...”.
6/3	Paragraph 6: 4Lines 89, delete “waste hierarchy and the proximity principle” and substitute “waste hierarchy, the proximity principle and the precautionary principle”.
6/4	Policy WLP1, preamble: delete first 2 lines and substitute “Proposals in the Plan area will aim to ensure that waste is recovered or disposed of without endangering human health and without using processes or methods which could harm the environment, and will be assessed against and shall contribute to the achievement of sustainable development, by means of the criteria set out below”.
6/5	Policy WLP1(a): delete “and the proximity principle” and substitute “the proximity principle and the precautionary principle”.
6/6	Policy WLP1(e): delete all after “Plan area” on line 2.
6/7	Footnote 41A, line 1, insert before “processes”, “the physical, thermal, chemical or biological”.

Paragraph 6.4A and Policy WLP2: Transport Strategy (See Pages 67 to 70 of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
6/8	Above paragraph 6.4a insert new heading: <i>Transport Strategy</i>

Paragraph 6.4A and Policy WLP2: Transport Strategy
(See Pages 67 to 70 of the Inspector’s Report)

6/9	<p>Policy WLP2: Delete text of policy WLP2 and substitute:</p> <p>Proposals will be required to demonstrate that:</p> <ol style="list-style-type: none"> a. the proposed facility is located as closely as practicable to the sources of waste that will be managed by it b. access and use by modes of transport other than road have been considered and, if not proposed, why it would not be practicable; and c. if road transport is to be used, the proposal is located and designed to minimise the length and number of road traffic movements and the proposal will comply with policy WLP36
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Paragraphs 6.5 - 6 and Policy WLP3: Areas of Outstanding Natural Beauty
(See Pages 70 to 73 of the Inspector’s Report)

Modification ref.	Proposed Councils’ Modifications:
6/10	<ul style="list-style-type: none"> • Delete text of criterion c. in WLP3 and substitute: there will be no detrimental effect on the environment and landscape, having regard to any measures to moderate the effect or to provide a compensating environmental resource for any loss that is acceptable.

Paragraphs 6.7 – 10 and Policy WLP4: Road to Rail or Water Transfer
(See Pages 73 to 75 of the Inspector’s Report)

Modification ref.	Proposed Councils’ Modifications:
6/11	Paragraph 6.7, line 10, delete ‘may’
6/12	Paragraph 6.7, delete last sentence
6/13	Paragraph 6.8, lines 24, delete ‘the Plan does not support ... special needs and substitute: ‘The plan does not support the net import of waste from areas outside the Plan area. Subject to this, there maybe local cross border movements or movement to facilities for meeting special needs.’
6/14	Paragraph 6.9, add at end of paragraph: ‘Applicants will be expected to consider the use of rail or waterborne transport when preparing Transport Assessments.’
6/15	<p>Policy WLP4, delete and substitute:</p> <p>Proposals which will enable waste to be carried on the rail network or by water will be permitted, subject to other policies of the Plan where relevant, and where it is demonstrated that this would achieve overall environmental benefits.</p>

Paragraph 6.11: Site Policies: General
(See Pages 75 to 77 of the Inspector’s Report)

Paragraph 6.11: Site Policies: General (See Pages 75 to 77 of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
6/16	Paragraph 6.11: line 6, delete “these strategic” and substitute “waste management”.
6/17	Line 9, delete “(WLP13, 19, 20 or 21)” and substitute “(WLP13-21 and 23-24 inclusive)”.

Paragraphs 6.12 – 13 and Policy WLP5: Safeguarding Sites (See Pages 77 to 79 of Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
	No accepted Inspector’s recommendations to these paragraphs and policy.

Paragraph 6.14 and Policy WLP6: Expansion or Alteration to Existing Facilities (See Pages 79 to 80 of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
6/18	Line 2, delete “will only be supported” and substitute “will be permitted, subject to other policies of the Plan where relevant,”
6/19	Criterion (c), line 1, delete 2nd “the” and substitute “net”.
6/20	Delete criterion (d).

Paragraphs 6.15-6.17A: Site Specific Policies : general (see pages 81 – 83 of the Inspectors Report)	
Modification ref.	Proposed Councils’ Modifications:
6/21	Insert heading before paragraph 6.15 “Site Specific Policies”.
6/22	Para 6.15: Delete “9/1” in first line
6/23	Para 6.16: Delete second sentence (“They will also... Development Plan”).
6/24	Paragraph 6.17A: line 6, delete “would” and substitute “might”.

Paragraphs 6.18 – 19 and Policy WLP7: Site-specific allocation for road to rail transfer facilities (See Pages 83 to 89 of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
6/25	Paragraph 6.19, first line, insert “or water” after “road to rail”.
6/26	Paragraph 6.19, second line, insert “or water” after “road to rail”.
6/27	Paragraph 6.19, delete “criteria.....other relevant policies” and substitute “policies WLP4, WLP13 and other relevant policies.”
6/28	Policy WLP7: delete ‘a)’ in policy WLP7

Paragraphs 6.20- 6.25 and WLP8: Site specific allocations for Materials recovery Facilities/Waste Transfer Stations (See Pages 89 to 93 of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
6/29	Para 6.20: Fourth line delete “sites” and replace with “site”.
6/30	Para 6.20: Delete final sentence.
6/31	Para 6.21: Delete Abbatoir and replace with Abattoir.
6/32	Para 6.22: Delete Abbatoir and replace with Abattoir.
6/33	Para 6.22: Fourth line, after “strategic MRF,” insert “provided the amenities of nearby residents are fully safeguarded. The local road network may limit the total capacity of facilities provided here. Development will be...”.
6/34	Para 6.24, First and second sentences, delete ‘site additional’ .
6/35	Insert at end of para 6.24, “The location at Tutts Barn, Eastbourne will also have the potential for road to rail transfer facilities.”
6/36	Delete paragraph 6.25 and substitute: “There is a need for additional waste management capacity to be identified in the eastern part of the Plan area (Hastings, Bexhill, Battle and the rural hinterland). The existing facility at Pebsham has planning permission to continue until beyond the Plan period, and any proposals for modernisation or expansion would be supported by policy WLP6 subject to the criteria set out there. To reflect its continuing strategic role, it has been identified under policy WLP8. However any increase in vehicle movements along the A259 would be unacceptable until the strategic road network in the area has been improved. The future of this area will need to be co-ordinated with plans for the Pebsham Countryside Park, and any redevelopment proposals for the site will be expected to assist in reducing its visual impact.”
6/37	Insert after paragraph 6.25: The strategic locations identified below, together with the allocations for disposal to land in policy WLP10, may not be sufficient in themselves to manage all the waste arising in the Plan area. That depends on suitable proposals coming forward and on the type and capacity of plant which is found to be acceptable at the planning application stage. There are also advantages under the proximity principle if waste is managed at smaller-scale facilities which serve the local community. A number of small businesses already make an important contribution in this respect, as listed in Appendix 3. Smaller scale facilities will therefore be assessed and included in the Plan as appropriate at the Plan’s review stages.
6/38	WLP8: Delete Abbatoir and replace with Abattoir.
6/39	WLP8c/1, delete “/1”.
6/40	WLP8d, delete entire of WLP8d.
6/41	WLP8e, delete “e” and replace with “d”
6/42	Insert at end of policy “e) Pebsham WDF plant and adjoining land (plan 12)”

Paragraphs 6.27 – 27 and Policy WLP9: Site specific allocations for Energy from Waste and Materials Recovery Facilities: general (See Pages 110 to 133 of the Inspector’s Report)	
Modification	Proposed Councils’ Modifications:

Paragraphs 6.27 – 27 and Policy WLP9: Site specific allocations for Energy from Waste and Materials Recovery Facilities: general (See Pages 110 to 133 of the Inspector's Report)	
ref.	
6/43	Paragraph 6.26: Last line, delete "possibly".
6/44	Delete paragraph 6.27 and Insert new text. 6.27 The location at North Quay, Newhaven would be suitable for rail or water transfer of waste, to or from road vehicles, subject to the rail link being reopened and/ or the site selected having access to the wharf. This could be used for bringing in waste to a facility or facilities or for taking out recyclates or saleable by-products of waste management (including waste reprocessing) and residues. Proposals for further waste recovery capacity, including energy from waste, will undoubtedly come forward in the east of the Plan area. Any such proposal will be considered on its merits using the Plan's generic policies, including WLP 19.
6/45	In the title to Policy WLP9 replace 'facilities' with 'facilities'.
6/46	Policy WLP9: Delete "b) Mountfield Mine, Robertsbridge (Area of Search) (plan 9)"

Paragraph 6.27A and Policy WLP9/1: Reserve site-specific allocation for a Materials Recovery Facility/Waste Transfer Station for the eastern area (See Pages 133 to 140 of the Inspector's Report)	
Modification ref.	Proposed Councils' Modifications:
6/47	Delete the heading "Reserve site for Materials Recovery Facility/Waste Transfer Station", paragraph 6.27A and policy WLP9/1.

Paragraphs 6.28 – 6.30 and Policy WLP10: Site Specific allocations for waste disposal to land (see pages 140- 153 of the inspectors report)	
Modification ref.	Proposed Councils' Modifications:
6/48	Paragraph 6.28: line 4, delete everything after "until" and insert "2008".
6/49	Paragraph 6.29: line 4, delete "towards the end of the Plan period" and substitute "by about 2008".
6/50	Paragraph 6.30: delete line 2 ("are not expected...plan period") and substitute "will still leave a shortfall of approximately 2.9 to 3.6 million cubic metres (mcm) of non-inert waste and 1.8 mcm of inert waste during the Plan period.
6/51	Insert new paragraph after paragraph 6.30: "As part of the first review of the Plan, it is intended to investigate the anticipated start date and potential annual throughput of the Ashdown landfill site in more detail, having regard to the proposed new road infrastructure and the need for continued clay extraction. If the full potential of the site cannot be achieved and the shortfall in void space capacity in the Plan area seems unlikely to be remedied by 2015, then consideration will be given to the allocation of a further disposal to land site in the west of the area. This would follow a reappraisal of those areas of search previously identified in the consultation draft of the Plan and other suitable existing mineral workings.

Paragraphs 6.28 – 6.30 and Policy WLP10: Site Specific allocations for waste disposal to land
(see pages 140- 153 of the inspectors report)

6/52	Policy WLP10: line 1, delete “Proposals for waste disposal to land will be supported” and substitute “Proposals for non-hazardous and stable non-reactive hazardous waste disposal to land will be permitted, subject to other policies of the Plan where relevant,”.
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Paragraphs 6.31 – 32 and Policy WLP11: Reduction, Re-use and Recycling During Demolition and Design and Construction of New Developments
(See Pages 153 to 155 of the Inspector's Report)

Modification ref.	Proposed Councils' Modifications:
	The Inspector has not recommended any modifications to these paragraphs or policy.

Paragraphs 6.33 – 34 and Policy WLP12: Recycling as Part of Major Development
(See Pages 155 to 156 of the Inspector's Report)

Modification ref.	Proposed Councils' Modifications:
6/53	Line 2, insert after “shall”, “have regard to the extent to which the proposals”.

Paragraphs 6.36 – 41 and Policy WLP 13: Recycling, Transfer and Materials Recovery Facilities
(See Pages 157 to 159 of the Inspector's Report)

Modification ref.	Proposed Councils' Modifications:
6/54	Insert new heading “Mechanical-biological treatment” after paragraph 6.41 and add new paragraph: “Mechanical-biological (see paragraph 3.47) treatment enables the biological treatment of putrescible waste as well as materials recovery. This may significantly improve the efficiency of a facility in reducing the amount of residual waste, as well as making it less biologically active. Accordingly such facilities will be encouraged, subject to the same locational criteria as MRFs.”
6/55	Line 2, after “waste materials”, insert “and the provision of mechanical-biological treatment plants”.
6/56	Line 3, delete “only be supported” and substitute “be permitted, subject to other policies of the Plan where relevant”.
6/57	WLP13(a): after “waste management sites” insert “(other than landfill)”.
6/58	Insert new criterion after WLP13(b), as follows: “(c) part of a major development scheme, if of a scale appropriate to the location; or”.
6/59	Re-letter criterion (c)
6/60	Delete criterion WLP13(d).

Paragraph 6.42 and Policy WLP14: Recycling and Recovery Facilities for Construction and Demolition Waste
(See Pages 160 to 161 of the Inspector's Report)

Modification ref.	Proposed Councils' Modifications:
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Paragraph 6.42 and Policy WLP14: Recycling and Recovery Facilities for Construction and Demolition Waste (See Pages 160 to 161 of the Inspector’s Report)	
6/61	delete “will only be supported” and substitute “will be permitted, subject to other policies of the Plan where relevant”
6/62	Second line of criteria a): after “waste management sites” insert “(other than landfill)”.

Paragraph 6.43 and Policy WLP15: Small Scale Recycling Collection Facilities (See Pages to of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
6/63	lines 1-2, delete “only be supported” and substitute “be permitted, subject to other policies of the Plan where relevant”.
6/64	at the end of policy WLP15(b) Insert “and/or” and insert new criterion (c): “part of a major development scheme”.

Paragraphs 6.44 – 45 and Policy WLP16: New Household Waste Sites (See Pages 163 to 164 of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
6/65	line 1, delete “only be supported” and substitute “be permitted, subject to other policies of the Plan where relevant”.
6/66	Insert “or” at the end of policy WLP16(c) and insert new criterion (d) as follows “they are part of a major development scheme”.

Paragraphs 6.46 – 47 and Policy WLP17: Reprocessing Industries (See Page 165 of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
6/67	Insert at beginning of text “The WPAs will support”;
6/68	At end delete “will be supported” and substitute “subject to other policies of the Plan where relevant”

Paragraphs 6.48 – 51 and Policy WLP18: Composting Facilities (See Pages 166 to 168 of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
6/69	Policy WLP18: delete “will only be supported” and substitute “be permitted, subject to other policies of the Plan where relevant”.
6/70	Policy WLP18(a): after “waste management sites” insert “(other than landfill)”
6/71	Insert “or” at the end of policy WLP18(d) and insert new criteria as follows: “(e) part of a major development scheme”

Paragraphs 6.52 – 55 and Policy WLP19: Energy from Waste Facilities (See Pages 169 to 182 of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:

Paragraphs 6.52 – 55 and Policy WLP19: Energy from Waste Facilities (See Pages 169 to 182 of the Inspector’s Report)	
ref.	
6/72	Paragraph 6.52: Add a new second sentence: “Only incineration is tried and tested in the UK for municipal, commercial and industrial waste. These processes recover energy from waste but the material is largely converted to gases and ashes so they rank lower in the waste hierarchy than the materials recovery processes considered above.”
6/73	Insert following paragraph after 6.52. “Anaerobic digestion is a different form of EfW facility than thermal treatment, and it differs from composting in that the degradation of waste takes place in the absence of air. The process of anaerobic digestion is described in chapter 3. Depending on the quality of input, both materials and energy may be recovered. Possible amenity problems include odour, and applicants will be required to demonstrate how this and other impacts (including traffic) would be overcome, in order to comply with policies WLP35 and WLP36. Policy WLP19 applies the same process-specific planning criteria to anaerobic digestion as to thermal treatment proposals. Wastewater treatment plants might also be suitable locations as there is the potential benefit of some sharing of facilities”.
6/74	Policy WLP19: Energy from Waste Facilities Proposals for Energy from Waste facilities will be permitted, subject to other policies of the Plan where relevant, where a need is demonstrated which cannot practicably be met by waste management methods higher up the waste hierarchy. Proposals shall be on land that is located within permitted or allocated industrial or waste management sites or on other suitable previously developed land. Proposals shall: a. be well related to major sources of waste; b. pursuant to policy WLP2, provide for the majority of the waste and residues to be transported to and from the site by rail or water unless it is demonstrated why that would not be practicable; c. include the maximum efficient capture of energy and, where feasible, provide heating for local use; and d. include an assessment of the environmental and health impacts which demonstrates that the process will not materially endanger human health or harm the environment.

Paragraphs 6.56 – 6.57 and Policy WLP20: Landfilling with Non-inert Waste (See pages 182 – 184 of the Inspectors Report)	
Modification ref.	Proposed Councils’ Modifications:
6/75	Paragraph 6.57: insert at end “Planning conditions will require that sites are restored to an identified after-use and that suitable aftercare is carried out”.
6/76	Policy WLP20: line 1, delete “only be supported” and substitute “be permitted, subject to other policies of the Plan where relevant”.

Paragraphs 6.56 – 6.57 and Policy WLP20: Landfilling with Non-inert Waste (See pages 182 – 184 of the Inspectors Report)	
6/77	Insert “and” after policy WLP20(d) and insert new criterion (e) as follows: “there is a clearly established need for additional waste disposal to land capacity. ‘Need’ is defined as a requirement for facilities to deal with the waste produced in the Plan area which outweighs any material agricultural, landscape, conservation or environment interest affected by the proposal”.

Paragraphs 6.58 – 6.59 and Policy WLP21: Landraising with Non-inert Waste (See pages 184 – 187 of the Inspectors Report)	
Modification ref.	Proposed Councils’ Modifications:
6/78	Paragraph 6.58: line 3, after “where all” insert “existing land disposal sites and mineral workings and “
6/79	Last sentence, delete “WLP12” and replace with “WLP21”.
6/80	Paragraph 6.59: line 3, after “surrounding area” insert “Planning conditions will require that sites are restored to an identified after-use and that appropriate after-care is carried out”.
6/81	Line 5, after “landraising is” insert “part of”.
6/82	<p>Policy WLP 21: delete text of policy and substitute as follows:</p> <p>“Proposals for landraising with non-inert waste will be permitted, subject to other policies of the Plan where relevant, where it is demonstrated that</p> <ol style="list-style-type: none"> a. the proposal forms part of a comprehensive scheme of restoration of an existing permitted land disposal or mineral working site; or b. the proposal is on other suitable previously developed land; or c. in the case of proposals on greenfield sites, all existing permitted land disposal and mineral working sites and appropriate previously developed sites have been investigated and eliminated as unsuitable for non-inert waste disposal; and d. the resulting final landform, landscape and after-use enhances the environment and is sympathetic to the land uses, landscape and nature conservation interests of the surrounding area; and e. where appropriate, the development includes measures to recover energy from landfill gas; and f. where appropriate, the proposal includes temporary on-site facilities for the recovery of wastes which can be managed by methods further up the waste hierarchy; and g. there is a clearly established need for additional waste disposal to land capacity. ‘Need’ is defined as a requirement for facilities to deal with the waste produced in the Plan area which outweighs any material agricultural, landscape, conservation or environment interest affected by the proposal.”

Paragraph 6.60 and Policy WLP 22: Landfill Gas (see pages 188 of the Inspectors Report)	
Modification ref.	Proposed Councils’ Modifications:
6/83	delete text of policy and substitute as follows: “Proposals for energy from waste facilities using landfill gas will be permitted, subject to other policies of the Plan where relevant, provided they are planned in such a way as to minimise conflict with the restoration and after-use proposed for the site”.

Paragraphs 6.61 – 62 and Policy WLP 23: Landfilling with Inert Waste (see pages 189 – 190 of the Inspectors Report)	
Modification ref.	Proposed Councils’ Modifications:
6/84	Policy WLP23: line 1, delete “only be supported” and substitute “be permitted, subject to other policies of the Plan where relevant”.

Paragraphs 6.63 – 62 and Policy WLP 24: Landraising with Inert Waste (see pages 190 – 191 of the Inspectors Report)	
Modification ref.	Proposed Councils’ Modifications:
6/85	Paragraph 6.64: insert at end : “Where appropriate, planning conditions will require that sites are restored to an identified after-use and that suitable after-care is carried out”.
6/86	Policy WLP24: line 2, delete “only be supported” and substitute “be permitted, subject to other policies of the Plan where relevant”.
6/87	Policy WLP24(c): delete “significant” and substitute “identifiable”.

Paragraphs 6.65 – 66 and Policy WLP 25: Landfill Mining (see pages 192 – 193 of the Inspectors Report)	
Modification ref.	Proposed Councils’ Modifications:
6/88	Paragraph 6.66: insert at end, “Any proposal would need to be accompanied by a detailed evaluation of releases of pollutants to atmosphere and to water”.
6/89	Policy WLP25: delete text of policy and substitute as follows: “Proposals for landfill mining will not be permitted without a detailed evaluation of the potential health and environmental effects of any release of pollutants from the site. The proposals must demonstrate that: a. the operation includes approved measures to ensure pollutants will remain within acceptable environmental and public health standards; and b. where practicable, the recovering of materials for re-use and recycling is integral to the proposals”.

Paragraph 7.2 – 7.5 and Policy WLP26: Mineral Waste (See Page 228 of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
7/1	Paragraph 7.2: add to end new sentence: “Opportunities for blending of mineral waste may arise if soil/compost materials are being produced on-site, the mixture yielding soil forming materials. The former DETR document <i>Soil Forming Materials – their Use in Land Reclamation</i> (1999) gives further guidance”.
7/2	Policy WLP26: line 1, delete “supported” and substitute “permitted, subject to other policies of the Plan where relevant”.

Paragraphs 7.6 – 7.12 and Policy WLP27: Special and Difficult Waste (See Pages 229 to 232 of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
7/3	Policy WLP27: lines 2-3, delete “will only be supported where it is demonstrated that” and substitute “will be required to demonstrate that”.
7/4	After criterion (b) insert new criterion as follows: “(c) the co-location of waste facilities has been considered, where appropriate”.

Paragraphs 7.13 – 7.15 and Policies WLP28 & WLP29: Clinical Waste (See Pages 232 to 233 of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
7/5	Policy WLP28: delete “will only be supported where it is demonstrated that” and substitute, “will be required to demonstrate that”.
7/6	Policy WLP29: delete “will only be supported where it is demonstrated that” and substitute, “will be required to demonstrate that”.

Paragraphs 7.16 – 18 and Policy WLP30: Waste Water and Sewage (See Pages 233 to 237 of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
7/7	In the title replace “Waste Water” with “Wastewater”
7/8	Para 7.16 replace “waste water” with “wastewater”
7/9	Paragraph 7.17: Delete second sentence (lines 4-7) and substitute “The WPAs approach to the management of wastewater is to adopt the general policy of reducing the amount and polluting potential of that requiring final disposal and the recovery of as much of the valuable content of the waste as possible.”
7/10	Paragraph 7.17A: Line 2, delete “hierarchy” and substitute “levels of treatment”.
7/11	Paragraph 7.17A: Amend description of secondary and tertiary treatment to read: “Secondary – this commonly entails some form of biological treatment, often but not

Paragraphs 7.16 – 18 and Policy WLP30: Waste Water and Sewage (See Pages 233 to 237 of the Inspector’s Report)	
	<p>necessarily associated with a further settlement process, to achieve reductions in both dissolved and suspended biodegradable pollutants. This results in a further reduction in suspended solids.</p> <p>Tertiary – a further stage of treatment whereby the secondary treated effluent is subject to further physical, chemical or biological processes to meet specific environmental requirements. An example is the use of ultra-violet disinfection to reduce substantially the bacteriological count in the final effluent.”</p>
7/12	Paragraph 7.18: Lines 4-5, omit “are located in the most sustainable location and”.
7/13	WLP30, replace “Waste Water” with “Wastewater”
7/14	Policy WLP30: Line 2, replace “management and treatment” with “management, treatment and disposal”.
7/15	Policy WLP30: Lines 2-3, replace “will only be supported” with “will be permitted subject to other policies of the Plan where relevant and”.
7/16	Policy WLP30: Criteria (a), addition of “or prospective” before “environmental standards”
7/17	Policy WLP30: Criteria (b), delete “to meet” and substitute “principally to serve”.
7/18	<p>Insert new paragraph after para 7.18:</p> <p>There is an urgent requirement for the provision of enhanced wastewater treatment for Brighton and Hove, which is the largest centre of population in the Plan area. Currently the majority of wastewater from the catchment is discharged into the sea via a 2 km long outfall following preliminary treatment at Portobello. A planning application for the provision of enhanced wastewater treatment on the Portobello site has been refused by the Secretary of State and, given the urgency of the need to fulfil the Urban Wastewater Treatment Directive requirements, it has not been practicable to identify an alternative site through the Waste Local Plan process. However, given that the catchment area to be served by the treatment works is fixed and there are clear physical and topographical features that contain the catchment area, a reasonable area of search for a site within the plan area could be defined as the area limited by the River Adur to the west, the Downs east of the River Ouse to the east, the A27 trunk road corridor to the north and the sea to the south.</p>
7/19	<p>Insert new policy WLP30A to read:</p> <p>WLP30A: Waste Water and Sewage Sludge (Brighton & Hove/Peacehaven Catchment)</p> <p>The provision of new wastewater treatment facilities for the Brighton and Hove/Peacehaven drainage catchments and to process the sludge arisings will be required to demonstrate that:</p> <ol style="list-style-type: none"> a. the site has been selected from within the area of search which, within the Plan area, is limited by the Plan area boundary to the west, the Downs east of the River Ouse to the east, the A27 trunk road corridor to the north and the sea to the south; and b. the criteria in policy WLP30 have been satisfied.

Paragraphs 7.19 – 7.22 and Policy WLP31: Land-spreading of Liquid Wastes and Dredgings (See Pages 237 to 239 of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
7/20	Para 7.20. Line 2-3 delete ‘including screening and pasteurisation’
7/21	Policy WLP31: line 2, delete “will only be supported where it is demonstrated that” and substitute “will be required to demonstrate that”.

Paragraphs 7.23 – 7.24 and Policy WLP32: Liquid Waste (See Pages 239 to 240 of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
7/22	Para 7.24, fifth line. Delete off and replace with of
7/23	Policy WLP32: line 2, delete “will only be supported where it is demonstrated that” and substitute “will be required to demonstrate that”.

Paragraphs 7.26 – 7.28 and Policy WLP33: Agricultural and Stable Waste (See Pages 240 to 241 of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
7/24	Policy WLP33: line 3, delete “will be supported” and substitute “will be permitted, subject to other policies of the Plan where relevant”.

Paragraphs 7.29 – 7.31 and Policy WLP34: Animal Carcass Waste (See Pages 241 to 242 of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
7/25	Policy WLP34: line 1, delete “will only be supported where it is demonstrated that” and substitute “will be required to demonstrate”.

Paragraphs 8.1 – 10 and WLP35: General Amenity Considerations (see pages 243 - 246 of the Inspectors Report)	
Modification ref.	Proposed Councils’ Modifications:
8/1	Para 8.3, insert new second bullet point. Regional Spatial Strategy (Formerly RPG9)
8/2	Para 8.3, last bullet point, delete ‘Department of the Environment’ and replace with ‘Government’.

Paragraphs 8.11 – 12 and Policy WLP36: Transport Considerations (See Pages 246 to 248 of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
/	None

Paragraphs 8.13 – 14 and WLP37: Flood defences, flood plains and surface water runoff (see pages 248 - 249 of the Inspectors Report)	
Modification ref.	Proposed Councils' Modifications:
8/2	WLP37(b): line 3, add at end, "together with a flood risk assessment".
8/3	Policy WLP37(c): lines 2-4, delete "unless the planning authority is satisfied...prior to" and substitute "unless appropriate alleviation/mitigation works, such as the provision of sustainable drainage systems (SUDS), can be incorporated by the developer and approved by the local planning authority prior to"

WLP38: Surface and Groundwater (see pages 248 – 249 of the Inspectors Report)	
Modification ref.	Proposed Councils' Modifications:
/	None

Paragraphs 8.15 – 16 and WLP39: Design Considerations (see pages 250 - 251 of the Inspectors Report)	
Modification ref.	Proposed Councils' Modifications:
8/4	WLP39(a): delete "complement" and substitute "respect".

Paragraphs 8.17 – 17 and WLP40: Environmental improvements and other public benefits (see pages 251 - 252 of the Inspectors Report)	
Modification ref.	Proposed Councils' Modifications:
8/5	Heading preceding 8.17, delete "public".
8/6	Heading to WLP40, in heading delete "public" as in the proposed modifications.

Chapter 9: Implementation, Monitoring and Review (See Pages 255 to 256 of the Inspector's Report)	
Modification ref.	Proposed Councils' Modifications:
9/1	Para 6.6, line 6. Delete contained inDevelopment Plans'
9/2	Delete para 9.8.
9/3	Insert new paragraphs under the following headings "The Planning and Compulsory Purchase Act (2004) 9.9 Under the Planning and Compulsory Purchase Act (2004) the Government has proposed comprehensive changes to the planning system. The aim is to create a simpler, more efficient system with greater community involvement. 9.10 Existing regional planning guidance has become Regional Spatial Strategy (RSS). This will be replaced by a review of RSS, which will be drafted for Government by the South East England Regional Assembly (SEERA). Structure Plans will be saved for three years or until the approval of the revision of RSS. 9.11 Any plans that were being prepared (or reviewed) when the new Act

Chapter 9: Implementation, Monitoring and Review (See Pages 255 to 256 of the Inspector’s Report)	
	<p>commenced, and which have reached an advanced stage of the statutory process, (which is the case for the Waste Local Plan) are allowed to continue to adoption under existing arrangements. This means that the policies in the Plan will then be saved for three years from its date of adoption. The Waste Local Plan will therefore remain part of the formal Development Plan for the area and its policies will continue to apply for the saved period.</p> <p>Waste Development Frameworks</p> <p>9.12 Under the new Act, the WPAs are required to prepare ‘Waste Development Frameworks’ (WDF), as well as associated Minerals and Waste Development Schemes and Statements of Community Involvement. The new Act allows councils to work together to prepare joint Local, Waste and/or Minerals Development Frameworks.</p> <p>9.13 As set out in Planning Policy Statement 12: Local Development Frameworks (PPS12) the WPAs are required to produce an annual report which will describe how well this in being implemented and whether the planning policies and objectives of the WDF are being met.⁵⁰</p> <p>9.14 Work on the Waste Development Framework for East Sussex and Brighton & Hove will commence as soon as the Waste Local Plan has been adopted.</p> <p>⁵⁰ Regulation 48 of The Town and Country Planning (Local Development)(England) Regulations, 2004”</p>

Appendix One: Glossary (See Pages 256 to 259 [and pages 5 to 6] of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
	NONE

Appendix Two: Bibliography (See Pages 256 to 259 [and pages 5 to 6] of the Inspector’s Report)	
Modification ref.	Proposed Councils’ Modifications:
1	Change all references to Her Majesty’s Stationery Office, London to ‘The Stationery Office, London’
2	Insert ISBN number after references – where available
3	Delete the word ‘sewage’ in the reference to The Sewage Sludge (Use in Agriculture) Regulations 1989 (as Amended) SI 1989/1263
4	In the reference to The Urban Waste Water Treatment Regulations, delete ‘2481’, and replace with 2841
5	Insert the following reference ‘Environment Act 1995, The Stationery Office, London’ after ‘The Waste Management Licensing Regulations 1994
6	Move the following reference The Producer Responsibility Obligations to follow The Packaging (Essential Requirements) Regulations
7	Insert the following reference after the Landfill Tax Regulations reference: The Special Waste (Amendment) Regulations 1997 SI 1997/251, The Stationery Office, London, ISBN0 11 063881
8	In the reference to the Producer Responsibility Regulations delete 1996 and replace with 1997
9	Move reference to Pollution Prevention and Control Act 1999 to precede reference to

Appendix Two: Bibliography (See Pages 256 to 259 [and pages 5 to 6] of the Inspector's Report)	
	Contaminated Land (England) Regulations 2000 SI 2000/227
10	Insert new reference Waste and Emissions Trading Act 2003 <i>The Stationery Office, London, ISBN 0 10 543303 9</i> after 'Contaminated Land (England) Regulations reference
11	Move the reference to Waste Incineration Directive to end of 'European Directive' section
12	In the reference to Urban Waste Water Treatment Directive, delete 217 and replace with 271.
13	In the reference to Waste Framework Directive delete 96/59/EEC and replace with 75/442/EEC
14	Move the reference to Waste Framework Directive to the beginning of the European Directive section
15	Insert the following reference 'IPPC Directive 96/61/EC Official Journal L 257, 10/10/1996 P. 0026 – 0040, European Documentation Centre, Brussels' after the Hazardous Waste Directive reference.
16	Move reference to Implementation of Council Directive 1999/31/EC on the Landfill of Waste to 'Other Reference Documents' after reference to East Sussex and Brighton & Hove Waste Strategy.
17	Insert the following reference End of Life Vehicles Directive 2000/53/EC Official Journal L 269, 21/10/2000 P. 0034 – 0043, European Documentation Centre, Brussels after Landfill Directive reference.
18	Insert the following reference 'Waste Electrical and Electronic Equipment Directive 2002/96/EC Official Journal L 037, 13/02/2003 P. 0024 – 0039, European Documentation Centre, Brussels after the reference to the Waste Incineration Directive
19	Insert following reference after PPG25 reference 'PPS 7 Sustainable Development in Rural Areas ODPM, August 2004
20	Insert following reference after PPS 7 reference 'PPS 11 Regional Spatial Strategies ODPM, August 2004
21	Insert following reference after PPS11 reference 'PPS 12 Local Development Frameworks ODPM, August 2004
22	Delete all 'Published by' references
23	Amend case formatting where required to ensure consistency

Appendix 3: Plan Area Waste Facilities (See Pages 257 to 258 of the Inspector's Report)	
Modification ref.	Proposed Councils' Modifications:
A3/1	Insert a new 'Liquid Waste Treatment Facility' section in the Lewes section of Appendix 3, and enter: 'Old Hamsey Brickworks, South Chailey' as the facility, and 'Lloyds Environmental Services Ltd' as the operator, and 'E397, N162' for the grid coordinates.
A3/2	Under Wealden, Waste Transfer Stations add "Diplocks Way, Hailsham; Haulaway; E582 N092".

Appendix 4: Proposals Map and Inset Maps (See Pages 256 to 259 and pages 94 – 153 of the Inspector's Report)	
Modification ref.	Proposed Councils' Modifications:

Appendix 4: Proposals Map and Inset Maps (See Pages 256 to 259 and pages 94 – 153 of the Inspector's Report)	
/	Insert Inset Map site notes as set out in CD1.79.
A4/1	Inset Map 1, Overview: line 2, delete “largely” and substitute “partly”.
A4/2	Inset Map 1, Issues: Last paragraph, add to end “This factor may limit the scale of development that would be acceptable”.
A4/3	Inset map 2: Issues: third paragraph (traffic/ dust /noise) add to end. Any proposal would have to include an assessment of this.
A4/4	Inset Map 3, Issues Second paragraph, add to end “A traffic order would be required to ensure that HGVs do not use Ditchling Road as a route to the site”.
A4/5	Inset Map 4: Proposed Uses: insert “of non-hazardous waste” after “Landfill”.
A4/6	Inset Map 5 'Overview': Delete the last sentence (“Priority use...terminal”) and replace with “The use of rail and water links will be encouraged”
A4/7	Inset Map 5 'Issues': first paragraph, insert at end “Preference for rail/water access (see above)”.
A4/8	Inset Map 5, Second paragraph, insert at end “Attention to views from town and AONB”.
A4/9	Inset Map 5, Third paragraph, insert at end “...and could be at risk of tidal flooding. Engineering works are likely to be required to mitigate these risks”.
A4/10	Inset Map 5, Last paragraph, insert at end “...and Lewes District Local Plan policy NH24. Any development which prejudiced these objectives would be required to demonstrate why no suitable alternative location was practicable, in Newhaven or elsewhere”.
A4/11	Delete Inset Plan 6
A4/12	Delete Inset Plan 7
A4/13	Inset Map 8: Proposed Uses: insert “of non-hazardous waste” after “Landfill”.
A4/14	Inset Map 8: Issues: first paragraph, insert at end “, construction of a new access road direct to the A269, and an agreement on lorry routing to avoid lorries having to travel through the Sidley district shopping centre. An infill rate of greater than 100,000 tonnes a year will also be dependent on the provision of new highway infrastructure including the Bexhill-Hastings Link Road and the 'Country Avenue' link to the proposed access road”.
A4/15	Inset Map 8: Issues: Second paragraph, insert at end “and study to ensure co-existence of landfill and brickworks”.
A4/ 16	Delete Inset Plan 9
A4/17	Inset Map 10: In title of map delete “/1”
A4/18	Inset Map 10: Issues: delete fourth item and substitute “To protect the amenities of businesses on the industrial estate, the main waste management processes should take place within an enclosed building that is subject to appropriate noise attenuation, odour and dust controls”.
A4/19	Inset Map 11: In title of map delete “8e” and replace with “8d”.
A4/20	Inset Map 11: Issues, delete second paragraph.
A4/21	Inset Map 11: Issues. Fourth paragraph, add to end “Policy WLP35 would apply”.
A4/22	Inset Map 11: Issues. Fifth paragraph, delete after “planning application” and

Appendix 4: Proposals Map and Inset Maps (See Pages 256 to 259 and pages 94 – 153 of the Inspector's Report)	
	substitute "will need to include a flood risk assessment and provide the necessary compensatory measures, which could include considerable engineering works".
A4/23	Inset Map 11: Issues Insert new paragraphs at this point: "A contamination survey would also be required, because of the site's former use as railway sidings" and "The site may be of wildlife interest and a detailed ecological survey would be required, identifying mitigation measures".
A4/24	Inset Map 11: Issues Last paragraph, line 3, delete "are in negotiation" and substitute "will negotiate".
A4/25	Inset map 12, In heading delete "9/1" and replace with "8e".
A4/26	Inset Map 12 'Overview': line 3, insert after "facility": "The existing landfill to the north is due to close by about 2008, and will be restored as part of the proposed countryside park".
A4/27	Inset Map 12 Issues: second paragraph, insert at end "Any net increase in traffic would be unacceptable at least until measures have been implemented to relieve congestion on the A259".
A4/28	Inset Map 12 Issues: Third paragraph, insert at end "Any development which would cause nuisance such as odour, noise or litter at these areas would be unacceptable".
A4/29	Inset Map 12 Issues: Delete fourth paragraph.
A4/30	Inset Map 12 Issues: Fifth paragraph, line 1, insert after "consideration", "especially having regard to the proposed countryside park";
A4/31	Inset Map 12 Issues: insert at end "A conventional incinerator would be unacceptable because of the bulk of building and size of chimney that would be required".
A4/32	Proposals Map: Amend boundary such that the WLP area encompasses Brighton & Hove.
A4/33	Proposals Map: Delete 7 (Diplocks Way) from the map and key.
A4/34	Proposals Map: Delete 9 (Mountfield) from the map and key