Review of the West Sussex Waste Local Plan 2014 (May 2019)

west sussex county council

Working in Partnership

South Downs National Park Authority

1. Introduction

The West Sussex Waste Local Plan (WLP), prepared in partnership by West Sussex County Council and the South Downs National Park Authority, was adopted in April 2014. The Plan is available to view on the County Council's website: www.westsussex.gov.uk/mwdf.

Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), and Paragraph 33 of the National Planning Policy Framework (2019) require local planning authorities to review local plans every five years from their date of adoption, to assess whether they need updating.[1] This means the Plan must be reviewed by April 2019. The review should take into account changing circumstances affecting the area or any relevant changes in national policy.

The purpose of this report is to provide a high level review of the Plan and to set out whether or not the plan is still effective and relevant. If it is necessary to update the Plan, then a formal timetable for such an update will be set out in the West Sussex Minerals and Waste Development Scheme, which is published annually.

This report has been informed by the Authorities' Monitoring Report for the period April 2017 to March 2018, which is available on the website, together with the reports for previous years.

Waste Local Plan (2014)

The Waste Local Plan (WLP) provides a basis for making consistent decisions about planning applications for waste management facilities. Formally adopted by both authorities in April 2014, the Plan covers the period to 2031 and is the most up-to-date statement of land use planning policy for waste. The Plan sets out four key areas which were prepared in order to help shape the future of waste management in West Sussex:

- a vision and strategic objectives for sustainable waste management;
- nine policies to achieve the strategic objectives for the management of different waste types (Policies 1-9);
- 13 development management policies to ensure no unacceptable harm to the environment, economy, or communities of West Sussex (Policies 11-23);
- six site allocations to help us meet the need for new facilities (Policy 10).

One of the key elements of the Plan is set out in the vision, and is to aspire to have zero waste going to landfill by 2031.[2]

The policies and site-specific allocations in the Plan have been implemented through the development management functions of both authorities since the Plan's adoption. Some policies are also implemented by the district and borough

[1] Planning Practice Guidance (Paragraph: 043. Reference ID: 61-043-20180913.) See Plan Reviews section of Plan Making on GOV.UK.

[2] See Paragraph 2.10.13 of the Waste Local Plan (2014).

councils within the Plan area, as the WLP forms part of the statutory Development Plan for the county.

The Plan is monitored on an ongoing basis. Each policy of the Plan contains trends, targets, and intervention triggers, which are reported on annually in the Monitoring Report covering the previous financial year.

Since the adoption of the WLP, a total of five monitoring reports have been published covering the following periods:

- April 2013 to March 2014;
- April 2014 to March 2015;
- April 2015 to March 2016;
- April 2016 to March 2017;
- April 2017 to March 2018.

Chapter 5 of the monitoring reports provides information on waste activity during the reporting year, including waste arisings, how waste was managed, the capacity of the facilities in West Sussex, whether there are capacity shortfalls (against the targets set out in the Plan), as well as the status of the sites allocated through Policy W10. Appendix E of the monitoring reports set out how the policies are performing against the baseline (2013/14) and anticipated targets.

Structure of this Report

This report has the following sections:

- Section 2: Review of national and local context – that is, any changes in circumstances since adoption;
- Section 3: Assessment of policies, including their performance since adoption;
- Section 4: Conclusions.

2. Review of National and Local Context

Since adoption of the WLP, there have been a number of changes to national policies, as well as publications and other plans that may have an impact on how the WLP is performing, or dictate whether any changes are required. Furthermore, the strategy and policy context for the Plan are set out in Chapter 4 of the adopted Plan, which are also reviewed within this section of the report.

This section of the report summarises any key changes to policy since the adoption of the WLP in April 2014 and concludes whether there are any substantive changes that require changes to the WLP at this time.

European Strategies and Policies

All EU Laws are transposed to UK law. The main implications for the WLP arise from the Waste Framework Directive, Water Framework Directive, and the need for Strategic Environmental Assessment, amongst others.

These laws may change if the UK exits from the European Union. If this happens, any changes to national policy that impact on the WLP would be identified through annual monitoring in the AMR. The potential of these changes is uncertain at this time but any issues picked up within the AMR could trigger a review of the WLP at the appropriate time.

National Policy and Guidance

National Planning Policy Framework (NPPF)

The NPPF, first published in 2012, was updated in July 2018, following consultation on proposed changes in March 2018. Further minor changes were made in February 2019. Key changes to the NPPF for waste planning are:

- land use and development of brownfield land;
- focus on design;
- changes to the acceptability of activities in the green belt;
- increased consideration of the natural environment, including designated landscapes, flood risk, air quality;
- energy security, including fracking.

The NPPF proposes more scope for joint and strategic plan making as well as confirming the importance of dealing with cross boundary strategic issues within the Duty to Cooperate. These changes were first flagged in the 2017 Housing White Paper, 'Fixing Our Broken Housing Market'.

The NPPF revisions have a direct impact on the implementation of the WLP but it is considered that the WLP is broadly in alignment with the revised NPPF and no update is required to WLP policies at this time.

National Planning Policy for Waste (NPPW)

The NPPW was published in 2014 and sets out planning policies for England. It was prepared to be read in conjunction with the NPPF, the National Waste Management Plan for England, and national policy statements for waste water and hazardous waste. The NPPW includes the waste hierarchy and requires authorities to positively undertake waste planning. The NPPW reduced the amount of guidance but did not include any fundamental change in policy direction from the previous Planning Policy Statement for Waste (PPS10). The impact on the WLP is considered to be minimal as it was prepared to align with PPS10 and any future changes to the NPPW will be considered through annual monitoring.

Planning Practice Guidance (PPG)

The NPPF is supported by the online Planning Practice Guidance which was first published in 2014. The Guidance is updated on a regular basis and relevant updates were made on publication of the revised NPPF in 2018 and 2019.

The PPG updates in 2018 included new references to Statements of Common Ground (SoCG) for all Plans. Although the WLP is not specifically supported by SoCG, work on the WLP required the Authorities to work on cross-boundary issues with adjacent waste planning authorities (WPAs) and those further afield, as required by the Duty to Cooperate. The WLP does not prevent the Authorities undertaking Duty to Cooperate work with relevant WPAs on strategic waste issues or signing up to SoCG.

PPG also includes guidance on Community Infrastructure Levy, which is not considered to impact the WLP.

National Waste Strategy

The Waste Management Plan for England (WMPE) set out the waste management situation in England in 2013 and fulfilled the mandatory requirements of article 28 of the revised Waste Framework Directive (rWFD). It brought waste management policies under the umbrella of one national plan.

Our Waste, Our Resources (OWOR): A Strategy for England 2018

OWOR 2018 is one of a number of Government policy statements relating to changes to recycling strategies and a move to 'the circular economy'. The Department for Environment, Food, and Rural Affairs (DEFRA) and the Environment Agency (EA) launched the resources and waste strategy to overhaul England's waste system, putting a legal onus on those responsible for producing waste or items that are harder or more costly to recycle, including cars, electrical goods, and batteries.

The Government launched a series of consultations to take forward the ideas set out in OWOR. The outcome of these consultations and any subsequent updates to the NPPW will need to be reflected in future reviews of the WLP.

A Green Future: Our 25-Year Plan to Improve the Environment (January 2018)

The 25-Year Environment Plan was prepared by DEFRA and the Environment Agency, and sets out a number of challenges to improve the natural environment within a generation. The document sets out policy and key indicators for:

- clean air;
- clean and plentiful water;
- thriving plants and wildlife;
- reducing the risks of harm from environmental hazards;
- using resources from nature more sustainably and efficiently;
- enhancing beauty, heritage and engagement with the natural environment;
- mitigating and adapting to climate change;
- managing exposure to chemicals;
- enhancing biosecurity;
- minimising waste.

The whole of the 25-Year Environment Plan will have an impact on the policies within the WLP but the section on waste has the most relevance. The policy drive is towards waste minimisation and the circular economy. There is a focus on eliminating plastic waste and developing new ambitious waste targets. Further detailed policy from Government will need to be taken account of in preparation of any future WLP review.

Regulations

Town and Country Planning (General Permitted Development) Order 2015

As part of a number of changes to permitted development rights, the GDPO 2015 relaxed the restrictions on some industrial and B8 Storage and Distribution uses to allow residential uses without requiring planning permission. Any change to residential use requires that the planning authority considers the impact on [existing] adjoining uses but the relaxation of the regulations has implications for the safeguarding of existing waste sites and the potential availability of suitable sites for waste development in the future. The impact of these changes will be monitored through the AMR. At this time it is not proposed that any change is required to the WLP.

Environmental Impact Assessment (EIA) Regulations 2017

A revised set of EIA regulations came into force in 2017, known as the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The revised regulations seek to front load the EIA process, requiring more detailed information and comprehensive appraisal at the screening stage. The regulations also demand a more robust approach to decision making, and emphasise the need for EIA's to consider impacts upon population, human health, climate change, and biodiversity, where appropriate.

The WLP contains a number of relevant policies (such as W14 on biodiversity and geodiversity, and W19 on public health and amenity). The changes to the regulations are not considered to have specific implications requiring review of the WLP.

ECJ Ruling (commonly referred to as 'Sweetman')

A decision by the Court of Justice of the European Union (CJEU), People Over Wind and Sweetman (2018), means that measures intended to avoid or reduce the harmful effects of a proposed project on a European site may no longer be taken into account by competent authorities (e.g. WSCC or the SDNPA) at the Habitats Regulations Assessment "screening stage" when judging whether a proposed plan or project is likely to have a significant effect on the integrity of a European designated site.

The judgement does not trigger a need to review the WLP at this time but it will need to inform any future review of the WLP.

Update to Strategic Environmental Assessment (SEA) Regulations

The SEA regulations were updated in 2015 and updates included raised screening thresholds for developments on industrial estates and large urban developments.

There is no need to update the WLP in response to these changes but they may have an impact on any future allocations for waste development.

Local Plan Policies

Since the adoption of the WLP, all the Districts and Boroughs in West Sussex, and the Joint Authorities have prepared updated Local Plan documents. These Local Plan documents were prepared using the WLP as part of the wider development plan and reflect wider changes to policy at the time they were adopted. There are no triggers within these documents for a review of the WLP at this time as the Local Plan documents only reflect the changes to national policy and guidance set out above. Each adopted Local Plan will be considered at the time the WLP is reviewed in the future.

West Sussex Joint Minerals Local Plan

The West Sussex Joint Minerals Local Plan (JMLP) was adopted in July 2018. The JMLP includes policies that are relevant to aggregate recycling, including policy M8 on processing at mineral sites, M24 on restoration and after care, and M26, specifically on maximising the use of secondary and recycled aggregates.

The recently adopted JMLP does not have any implications that trigger the need for a review of the WLP.

South Downs National Park

The South Downs Local Plan is currently at Examination. It is due to be adopted in the summer of 2019. It will replace all the extant and joint plans that are currently used with a single Local Plan for the whole of the South Downs National Park. The plan proposes a number of policies that will impact on waste

development including Net Gain, Dark Night Skies, as well as a general focus on a landscape-led approach to development.

The South Downs Local Plan took account of the adopted WLP and any future review of the WLP will need to consider the SDLP.

Adur District

The Adur Local Plan was adopted at a meeting of Adur Full Council on 14 December 2017. The new Local Plan sets the strategic development and land-use priorities for Adur (outside the South Downs National Park) up to 2032, and contains the policies against which development management decisions within that area will be made. It replaces the saved policies of the Adur Local Plan 1996 as the Council's Local Plan. The 1996 Adur Local Plan remains the Local Plan for the SDNPA until it is replaced by the South Downs Local Plan, which will be adopted in 2019.

Shoreham Harbour was identified as a broad location for change by the local planning authorities; aspirations for regeneration have been supported by various local and national government regeneration initiatives. To help deliver the regeneration of the Harbour and associated infrastructure, Adur District Council, Brighton and Hove City Council, and West Sussex County Council, are working with relevant agencies (Homes England and the Shoreham Port Authority) to deliver a Joint Area Action Plan (JAAP) for the area. The JAAP is due to be adopted in 2019.

The Local Plan has taken account of the adopted WLP and any future review of the WLP will need to take account of the Adur Local Plan and Shoreham JAAP.

Arun District

The Arun Local Plan (2011-2031) was adopted on 18 July 2018 and replaces the Arun Local Plan 2003, and the saved policies within it. The plan sets out a spatial vision, objectives, and a sustainable strategy for delivering the needed growth of the District over the plan period. The 2003 Arun Local Plan remains the Local Plan for the SDNPA until it is replaced by the South Downs Local Plan, which will be adopted in 2019.

The Arun Local Plan took account of the adopted WLP and any future review of the WLP will need to consider the Arun Local Plan.

Chichester District

The Chichester Local Plan 2014-2019 was adopted in July 2015. An Issues and Options Consultation for the local plan review was carried out in 2017 and a consultation on the proposed development strategy and accompanying policies was held between December 2018 and February 2019. The 1999 Chichester Local Plan remains the Local Plan for the SDNPA until it is replaced by the South Downs Local Plan, which will be adopted in 2019.

The Chichester Local Plan took account of the adopted WLP and any future review of the WLP will need to consider the Chichester Local Plan.

Crawley Borough

The Crawley Local Plan (Crawley 2030) was adopted in 2015. The Crawley LDS (2019) sets out how the Plan will be reviewed and anticipates consultations in 2019/2020 with submission of the review in 2020/2021.

The Crawley Local Plan took account of the adopted WLP and any future review of the WLP will need to consider the Crawley Local Plan.

Horsham District

The Horsham District Planning Framework was agreed in 2015 and sets out the planning strategy up to 2031. A Local Plan Review has started and the new plan period will run from 2018 to 2036. The 2007 Horsham Core Strategy remains the Local Plan for the SDNPA until it is replaced by the South Downs Local Plan, which will be adopted in 2019.

Mid Sussex District

The Mid Sussex District Plan 2014-2031 was adopted in March 2018. It replaces the Mid Sussex Local Plan 2004 (other than saved Local Plan policies). The 2004 Local Plan remains the Local Plan for the SDNPA until it is replaced by the South Downs Local Plan, which will be adopted in 2019.

The Mid Sussex District Plan took account of the adopted WLP and any future review of the WLP will need to consider the Mid Sussex District Plan.

Worthing Borough

The Worthing Core Strategy was adopted in 2011. Work on a new Worthing Local Plan began in 2016 and the Draft Worthing Local Plan was published for consultation between October and December 2018.

The emerging local plan takes account of the adopted WLP, and any future review of the WLP will need to take account of the Worthing Local Plan (once adopted).

3. Assessment of Policies

This section of the report provides information about how the policies have performed since adoption of the Plan. It presents information on trends since adoption, pulling together information presented within the Monitoring Reports, whilst also taking account of the views of Development Management officers on any issues that have arisen when applying the policies. As necessary, reference is also made to any substantive changes in national or local circumstances. It concludes whether each policy remains effective and relevant, or whether it requires updating.

For each policy, the table setting out the Implementation and Monitoring within the WLP is included.

Policy W1: Need for Waste Management Policies

WLP Measure/Indicator	WLP Trend/Target
Planning permissions granted for waste management facilities as indicated within Policy W1	Monitored through the Annual Monitoring Report, which will show capacity annually and set out any shortfall required following any new permissions (previous permitted capacity + new permitted capacity – shortfalls set out in Policy W1 = additional capacity still required through Plan period)
Waste arisings (in line with appropriate data collection cycles)	Trend of waste arisings to be in line with the waste forecasts
Disposal of waste to land (capacity, tonnes per annum, and percentage of total arisings)	Downward trend zero waste to landfill by 2031
Waste imports and exports by type and area (tonnes per annum)	Declining net importation of waste for landfill. Neutral imports/exports of waste for recycling and treatment by 2031.

Since adoption of the WLP, 25 planning permissions have been granted for waste management facilities in accordance with Policy W1. The AMRs provide annual updates on the capacities, and shortfalls, against Policy W1. Table 13 of the latest AMR (Table 1 below) shows the most recent capacity update. It shows that, based on the shortfalls in Policy W1, there is still a need for non-inert recycling and composting facilities, some non-inert waste recovery, and also non-inert landfill.

Table 1: Waste capacity and requirements

Waste Site	A. Shortfall in Policy W1 (tonnes) Forecasted needs in 2031	B. Capacity WLP Baseline	C. Capacity 2017/18 (tonnes)	D. Capacity Changed +/- (tonnes) C-B	E. Capacity Still Required (tonnes) A-D
All Transfer Capacity	140,000	1,169,725	1,359,000	+189,275	-49,275
Non-inert Recycling and Composting (MWS and C&I)	270,000	450,253	587,750	+137,497	135,503
C&D Recycling	No figure specified	573,378	540,000	-33,378	n/a
Non-inert Waste Recovery (MSW and C&I)	270,000	377,000	642,000	+265,000	5,000
Inert Recovery (annual capacity)	No figure specified	765,491	794,042	-28,551	n/a
Inert Landfill	No figure specified	0	0	0	n/a
Non-inert Landfill Capacity	605,000	1,750,000	0	-1,750,000	+605,000

Policy W10 of the WLP sets out the sites allocated in the Plan to meet the needs, including the indicated shortfalls, to 2031. A review of Policy W10 of the WLP is set out later within this document, providing information on any permissions granted at the allocated sites since adoption of the Plan. Where permissions have been granted on allocated sites, the capacities are included in Table 1.

The forecasts that underpinned the WLP have been reviewed annually, to assess whether or not there have been any changes since the baseline evidence was prepared. A number of assumptions were made about the likely rates of growth for the different waste streams, taking into account a number of factors. Table 2 sets out the rates that were applied.

Table 2: WLP growth rates

Waste Stream	Lower	Base Case	Higher
Municipal Solid Waste (MSW)	-0.5%	0%	+0.5%
Commercial	-1.0%	0%	+1.0%
Industrial	-2.0%	-1.0%	-1.0%
Construction, Demolition, and Excavation (CD&E)	0%	0%	0.5%

Although it was deemed that the 'base case' was the most likely to happen, the Plan was prepared in order to be flexible enough to allow for the lower and higher growth rates to be achieved, with to enable additional capacity to address shortfalls if there was higher growth. For the purposes of this review, the waste arisings since adoption of the Plan have been assessed against the higher growth rates, that have been updated to take account of the latest arisings (for 2017).

Municipal Solid Waste (MSW)

Figure 1 shows the baseline and high growth forecasts that underpinned the WLP, as well as updated forecasts, taking account of actual arisings since adoption of the WLP.

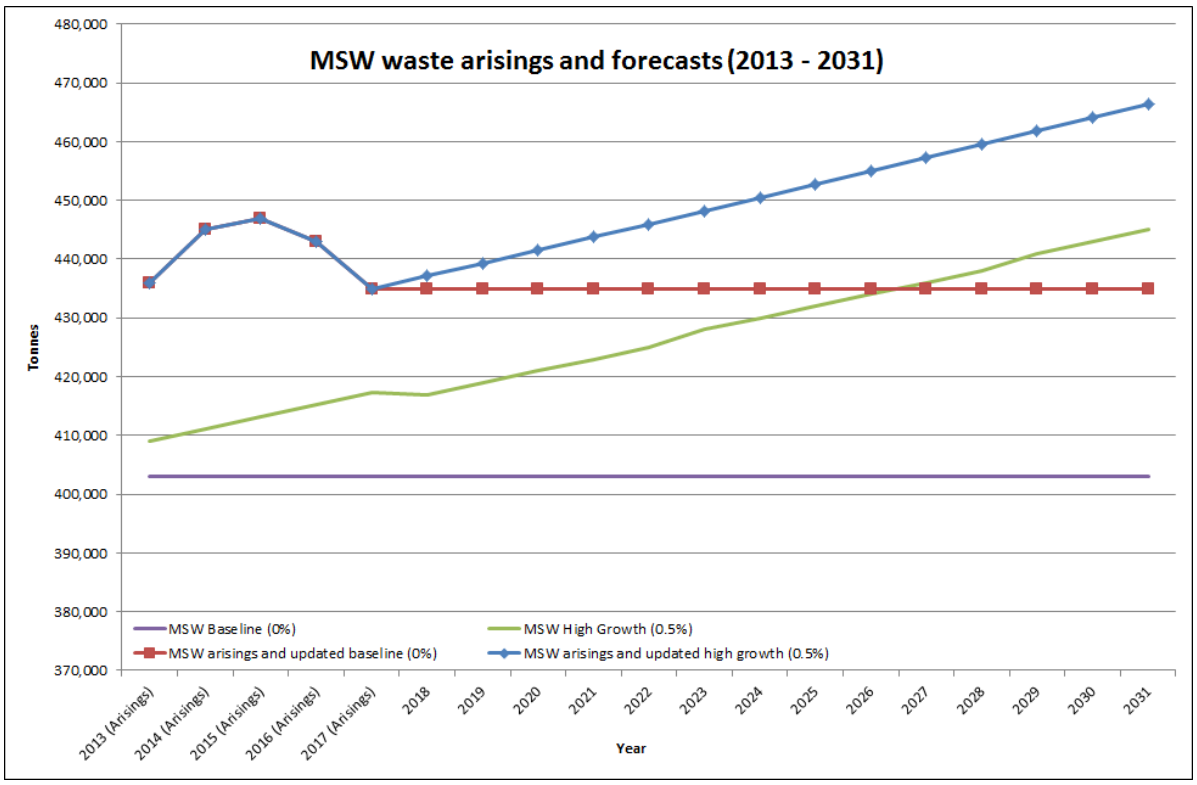

Figure 1: MSW waste arisings and forecasts (2013-2031)

Figure 1 shows that MSW arisings have been slightly higher than had been anticipated, with a peak in 2015 of 447,000 tonnes, compared to the anticipated (baseline) 2015 figure of 413,000 tonnes. The updated data suggests that MSW arisings may be as high as 467,000 tonnes in 2031, rather than the 445,000 tonnes in 2031 that was forecast in the high growth scenario. **This only represents an increase of 22,000 tonnes, which is considered to be a minimal increase.**

Commercial and Industrial Waste (C&I)

Figure 2 shows the C&I waste forecasts that underpinned the WLP, as well as updated forecasts. The methodology applied, that underpinned the WLP, was the 'point of production' method. In 2016, an updated methodology was considered to be more accurate when forecasting C&I waste, called the 'reconcile method'. Rather than applying data based on business profiles and waste production factors, a method first applied in 2009 through a DEFRA survey, the 'reconcile method' makes use of data published in the EA, which is collated via data that operators must submit to the EA as part of the waste permitting regime. This methodology was deemed to be sound at examinations of other authority plans nationally. Therefore, this approach was also applied to West Sussex.

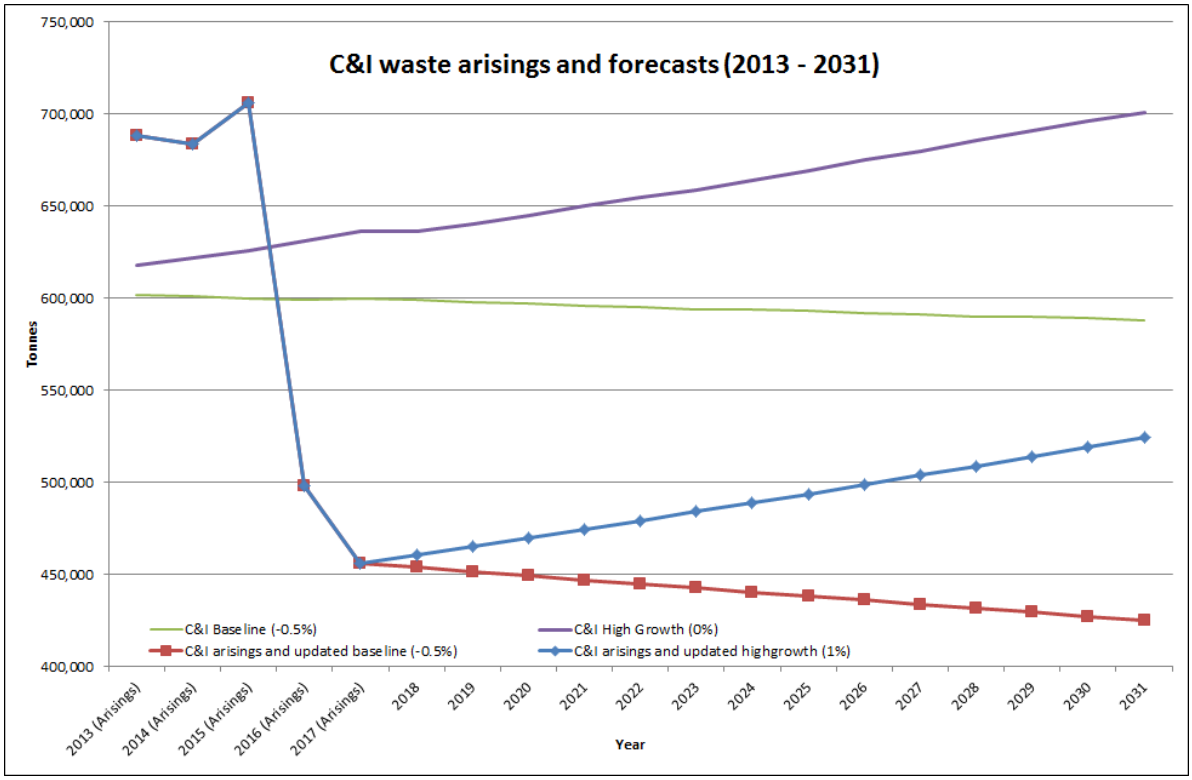

Figure 2: C&I waste arisings and forecasts (2013-2031)

Note: The arisings data for C&I waste since adoption of the WLP is produced as a single figure. The growth rates however vary for the commercial and industrial elements of the waste streams. In order to overcome this, as it is not clear what the split is between the two elements of the stream, a 1% uplift has been applied to the higher growth rate. This sets an over estimation, but is considered to be more accurate than attempting to split it and risk under forecasting.

Figure 2 shows that arisings are likely to be lower than originally anticipated, with a fall of almost 200,000 tonnes between 2015 and 2016 (due to the change in methodology). When applying the new methodology and using that as the basis for the updated forecasts, it shows that in 2031, C&I arisings may be 524,000 tonnes, rather than the originally forecasted 701,000 tonnes. **This means that, in 2031, C&I arisings will likely be 177,000 tonnes lower than anticipated (at the highest growth rates) when the WLP was prepared.**

Construction, Demolition, and Excavation Waste (CD&E)

Figure 3 shows the CD&E waste forecast rates that underpinned the WLP, as well as updated forecasts taking account of the latest data. The methodology applied, that underpinned the WLP, was the 'point of production' method. In 2016, the updated 'reconcile methodology' was considered to be more accurate when forecasting CD&E waste.

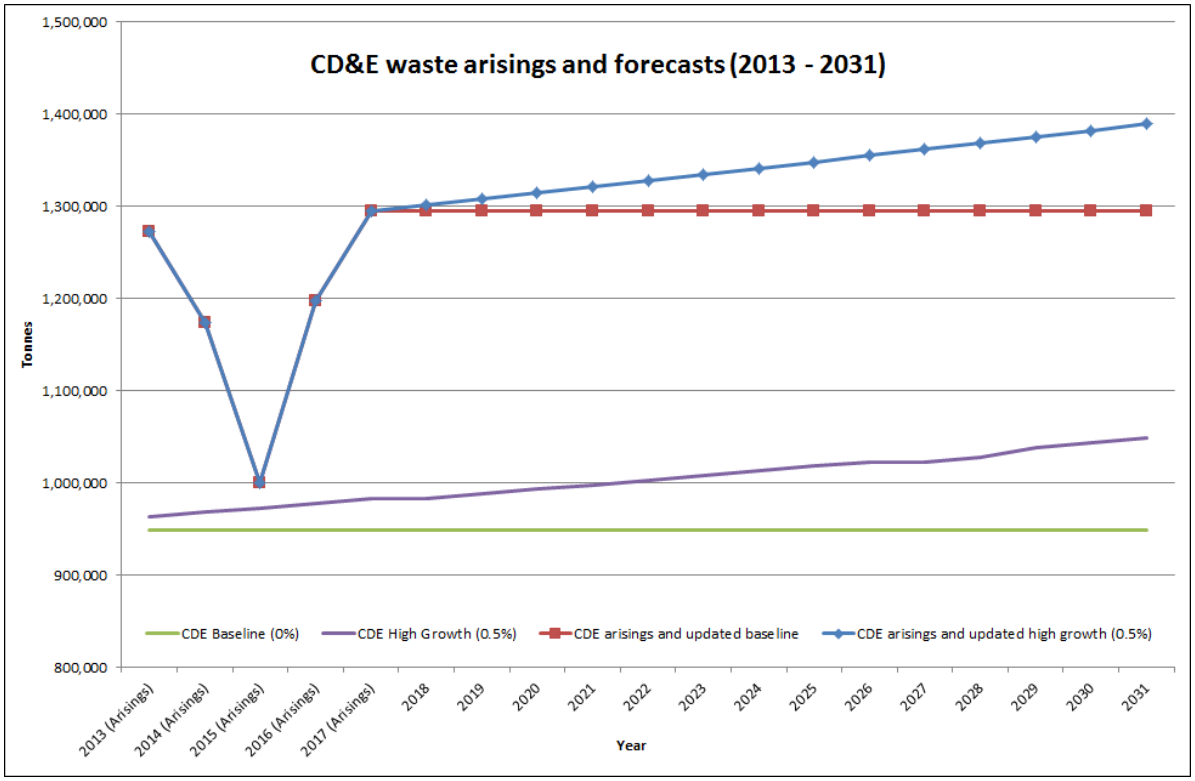

Figure 3: CD&E waste arisings and forecasts (2013-2031)

Figure 3 shows that CD&E waste arisings are anticipated to be higher than that calculated when the WLP was prepared. **In 2031, it is anticipated that CD&E waste arisings could be as high as 1.4 million tonnes (high growth scenario), some 350,000 tonnes higher than the original high growth forecast at 2031 (1.05mt).**

Total Waste

Table 3 presents the overall changes for the high growth scenarios. Figure 4 sets out a combined forecast for all waste streams, and compares it to the forecasts that underpinned the WLP. It shows that the amount of waste that may arise in 2031 may be close to 2.4 million tonnes (high growth); approximately 200,000 tonnes higher than anticipated when the WLP was prepared.

Table 3: Updated waste forecast (high growth)

Waste Stream	Original High Growth Forecast (at 2031)	Updated High Growth Forecast (at 2031)	Difference
MSW (0.5%)	445,000	467,000	+22,000
C&I (1%)	701,000	524,000	-177,000
CD&E (0.5%)	1,040,000	1,389,000	+349,000
Total	**2,186,000**	**2,380,000**	**+194,000**

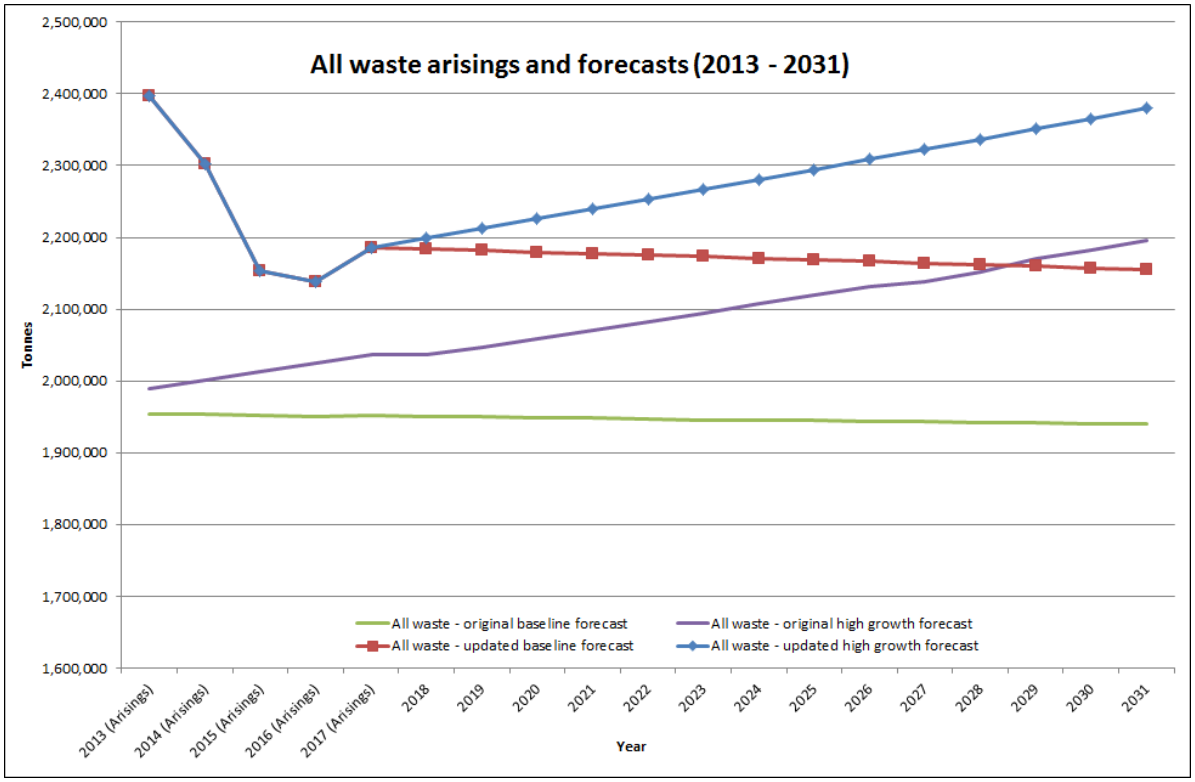

Figure 4: All waste arisings and forecasts (2013-2031)

Overall, applying the high growth scenarios, arisings could be around 200,000 tonnes higher in 2031, compared to when the WLP was prepared. This is not considered to be such a significant amount that the WLP would not be able to respond accordingly. The major increase in waste is anticipated in CD&E waste, of which 75% is inert waste that is recovered for beneficial use, following recycling (see review of policies W4, W8, and W9 below).

Total capacity (for all waste facilities, excluding that for inert recovery and non-inert landfill) is circa 3.13 million tonnes (see Table 1), whilst the high growth scenario (which was planned for in order to give contingency) shows that arisings may be as high as 2.38 million tonnes. **This therefore means that at present, current planned capacity is some 0.75mt higher than the arisings expected in 2031 under the high growth scenarios.** It is important to note that there is a need for a mix of facilities to deal with the various waste streams and types, and that sites such as transfer stations do not provide a final treatment/disposal for waste as they largely store, sort, bulk, and move waste on for treatment/disposal at other facilities. This often results in waste being recorded at multiple facilities, resulting in double counting in the EA data.

Policy W10 of the WLP allocates five sites for meeting the identified shortfalls (for C&I and CDE built waste facilities). Details of any planning permissions or applications at the allocations are provided in the relevant section of this report. **Two sites remain unpermitted for permanent built waste facilities at the allocations, with a total potential capacity of 250,000 tonnes per annum, which when combined with the current capacity (if permitted) would provide a total of 3.38 million tonnes of capacity, some 1 million tonnes higher than the expected arisings in 2031.**

The monitoring indicators for Policy W1 also include a need for assessing the disposal of waste to land, with a target for a downward trend, in line with the Plan's aspiration of zero waste to landfill. Policy W9 includes the same indicator; therefore landfill is discussed in more detail within the relevant section of this review document.

Waste Imports and Exports

Waste travels beyond administrative boundaries, and is managed based on commercial decisions. Larger waste operators are likely to take a national and regional view on the locations of their facilities. Data for imports/exports of waste is not readily available, with reliance on EA data to show those movements for facilities that operate under the EA permitting regime. In 2013/14, West Sussex was a net-importer of waste (see section 2.9 of the WLP).

EA waste data for 2017 is summarised in Table 4.

Table 4: Waste movements 2017

Source: Environment Agency Waste Data Interrogator (2017).

Imports

Basic Waste Category	Landfill Site Category	Treatment Site Category	Transfer Site Category	On/In Land Site Category	MRS Site Category	Total
Hazardous	-	1,757	271	-	6,308	**8,336**
MSW and C&I	23,560	206,963	19,848	3,469	31,931	**285,770**
CD&E	161,518	135,171	22,857	106,450	4,828	**430,825**
Total	**185,078**	**343,891**	**42,976**	**109,919**	**43,066**	**724,930**

Exports

Basic Waste Category	Landfill Site Category	Treatment Site Category	Transfer Site Category	On/In Land Site Category	MRS Site Category	Total
Hazardous	706	13,098	4,700	-	3,414	**21,917**
MSW and C&I	69,239	123,226	33,607	912	23,268	**250,251**
CD&E	31,979	80,048	20,747	41,111	10,290	**184,175**
Total	**101,924**	**216,371**	**59,054**	**42,023**	**36,971**	**456,343**

Balance

Negative Figure = Net Export; Positive Figure = Net Import.

Basic Waste Category	Landfill Site Category	Treatment Site Category	Transfer Site Category	On/In Land Site Category	MRS Site Category	Total
Hazardous	-706	-11,340	-4,429	-	2,894	**-13,581**
MSW and C&I	-45,679	83,737	-13,759	2,557	8,663	**35,519**
CD&E	129,539	55,123	2,110	65,340	-5,462	**246,650**
Total	**83,155**	**127,520**	**-16,078**	**67,897**	**6,095**	**268,588**

The tables above show that West Sussex was a net-importer of all waste, with some 270,000 tonnes more imported than exported in 2017. The indicators for Policy W1 are:

- for a declining amount being imported for landfill; and
- neutral import and exports for waste recycling and treatment by 2031.

Imports for Landfill

In 2017, more waste was imported for landfill than exported (net import of 83,155 tonnes). However, it is important to note that the vast majority of waste imported for landfill was CD&E waste (161,518 tonnes) followed by MSW and C&I (23,560 tonnes). Exports for landfill were largely made up of MSW/C&I waste (69,239 tonnes), with some for hazardous (there are no hazardous waste disposal facilities in West Sussex), and some 32,000 tonnes of CD&E waste. The importation of waste for landfill has decreased (in 2010, 310,000 tonnes), therefore in line with the trend.

As discussed in more detail for sections on Policies W8 and W9, the vast majority of waste landfilled was "inert" waste deposited at non-inert landfill sites that were being restored. This type of deposit is considered to have a beneficial use, and therefore would be a recovery project rather than landfill. The EA waste data does not make this distinction. There are now no longer any active landfill sites in West Sussex, whilst the non-inert landfill extension allocated has yet to come forward. It is therefore anticipated, in line with the data for 2017, that for landfill, West Sussex will continue to be a net-exporter for non-hazardous (MSW/C&I) waste.

Imports and Exports for Treatment and Recycling

In 2017 West Sussex was a net-importer of waste (127,520-tonnes) to treatment facilities (which include recycling sites). The majority of this net-import was for non--hazardous, C&I and MSW waste, whilst some 55,000 tonnes of CD&E waste was also net-imported. West Sussex was also a net-importer for just over 6,000 tonnes of waste to metal recycling sites (MRS). Although West Sussex does not have neutral imports and exports for waste recycling and treatment as sought by the indicator, it is expected that the picture will continue to change as the waste industry continue to move waste according to their markets. In the South East, the WPAs, through the South East Waste Planning Advisory Group, have signed up to a Memorandum of Understanding, which sets out that the authorities will all plan for net self-sufficiency, allowing for waste to continue to move as required, whilst all plan areas provide sufficient capacity for waste arisings.

The review of Policy W1 has shown that there are still shortfalls for waste management facilities to 2031. A review of the forecasts reveals that for CD&E waste, there is expected to be higher arisings that anticipated when the WLP was prepared, meanwhile for C&I waste, there are expected to be less arisings.

Overall, waste management capacity in West Sussex is currently 0.75mt higher than that expected to arise in 2031, whilst there continues to be 0.25mt of capacity available within the allocations (Policy W10). This suggests that there will continue to be sufficient capacity in West Sussex, in line with the principle of net self-sufficiency.

Evidence shows that West Sussex continues to be a net-importer of waste. However, the 2017 data shows a large amount of imports were of CD&E waste, which were used in the restoration of sites, therefore for a beneficial use. West Sussex non-hazardous landfill capacity has now depleted, therefore it is expected that West Sussex will become a net-exporter for landfill. The allocation at Brookhurst Wood landfill for an extension provides a suitable area for further disposal, should the waste industry decide it is needed.

Overall, the policy allows for changing circumstances, whereby facilities on unallocated land would be permitted if a market need can be demonstrated, whilst also being consistent with the principle of net self-sufficiency. The remaining allocations also provide potential scope to increase capacity significantly if required.

It is concluded that Policy W1 continues to be relevant and effective.

Policy W2: Safeguarding Waste Management Sites and Infrastructure

WLP Measure/Indicator	WLP Trend/Target
Transfer, recycling, and treatment capacity (tonnes)	No net loss
Number of safeguarded waste sites redeveloped for other uses (contrary to advice)	Zero

Figure 5 sets out how capacity has changed during the five year period, since adoption of the WLP. From 2015/16, the data on capacity includes that for specialist recycling facilities, following detailed data collection via an annual survey.

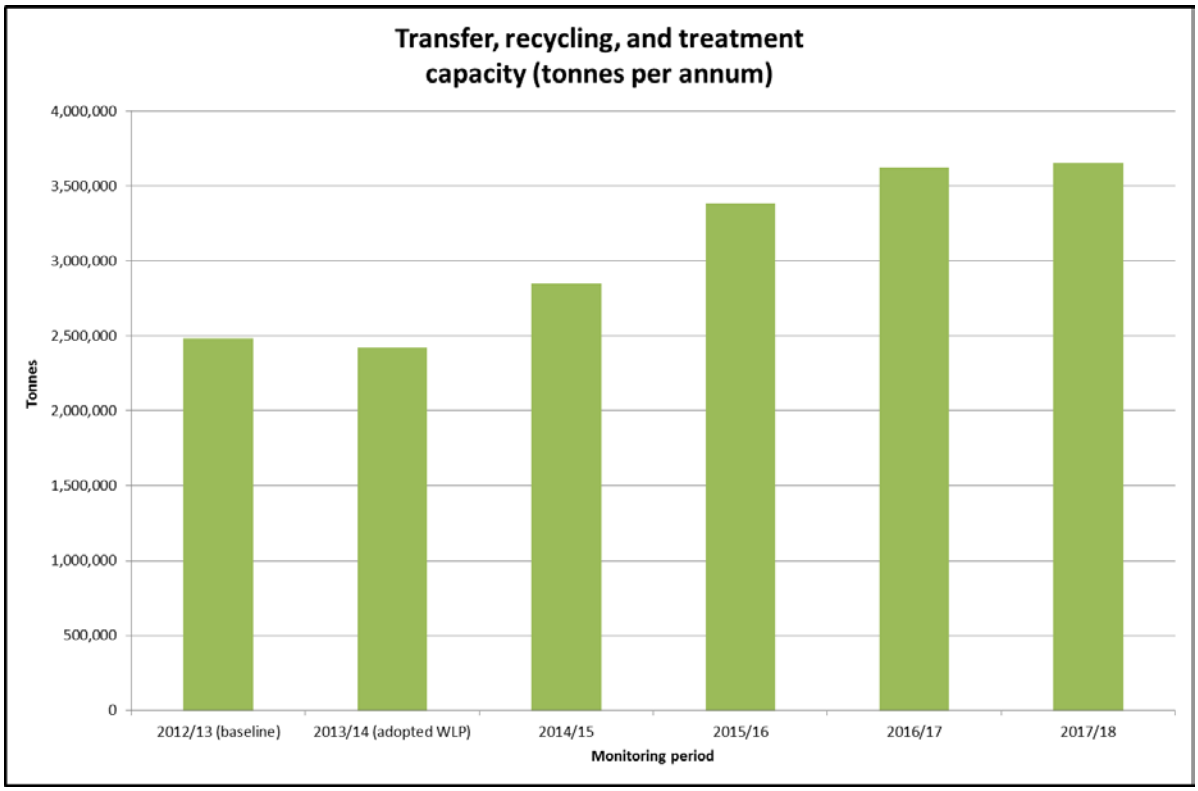

Figure 5: Transfer, recycling, and treatment capacity (tonnes per annum)

Figure 5 shows that overall, there has been no net loss in capacity, and therefore the trend/target is being met.

During the five-year period since adoption of the WLP, there have been no safeguarded waste sites redeveloped or lost, contrary to advice.

The Policy is performing as required, with no net loss in capacity or loss of safeguarded sites since adoption of the Plan.

It is concluded that Policy W2 continues to be relevant and effective.

Policy W3: Location of Built Waste Management Facilities

WLP Measure/Indicator	WLP Trend/Target
Number of applications for the transfer, recycling or treatment of waste permitted per annum	n/a
Transfer, recycling, and treatment of waste (capacity, tonnes per annum, and percentage of total arisings)	Upward trend
Number of facilities built on previously developed (brownfield) land	Upward trend
Number of facilities built on greenfield land	Downward trend

Figure 6 shows the total transfer, recycling and treatment capacity against annual waste arisings since adoption of the WLP. It shows that West Sussex currently has more overall capacity than the amount of waste arisings.

It is important to note that the figure below includes transfer sites, which are involved with the storing, sorting, bulking, and onward movement of waste. Waste that goes to transfer stations usually moves on to further waste facilities for recycling, treatment or recovery, meaning waste has gone through two (or more) facilities, therefore waste is often doubled counted in EA waste data.

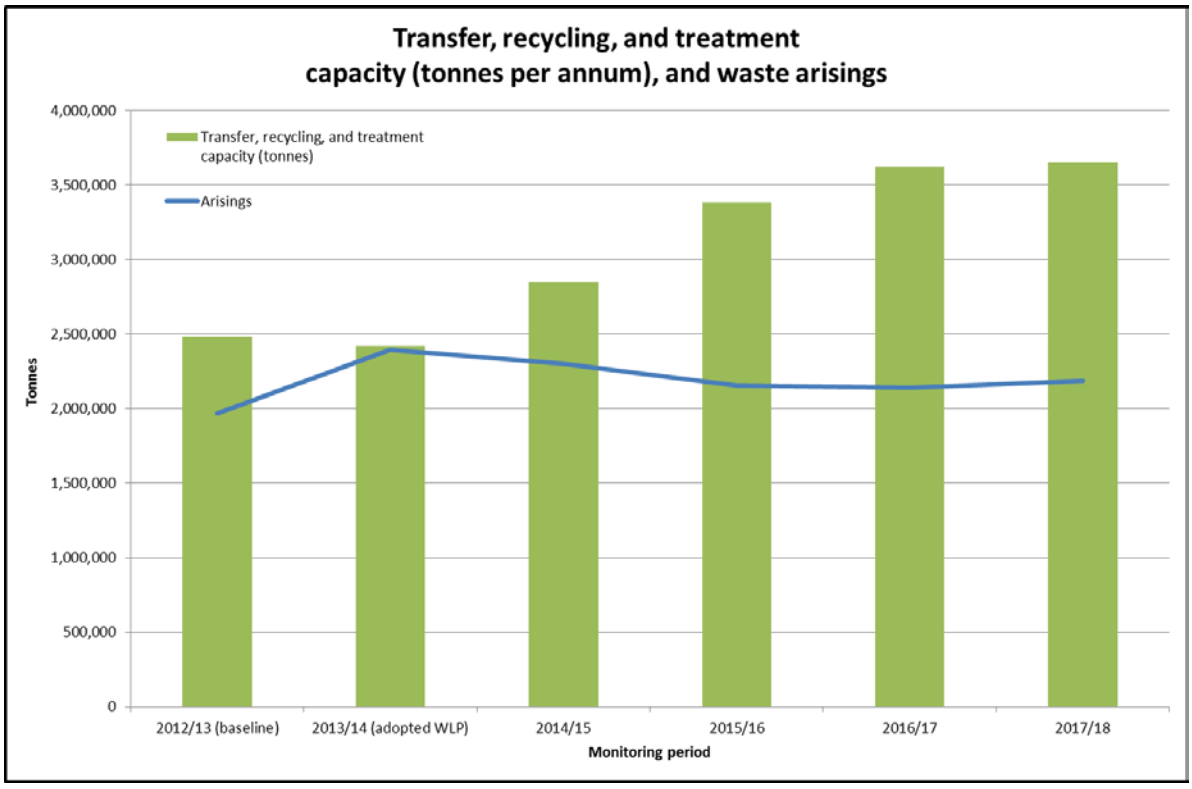

Figure 6: Transfer, recycling, and treatment capacity (tonnes per annum) and waste arisings

Figure 7 shows the number of planning applications for the transfer, recycling, or treatment of waste permitted per annum through the WLP, and also on what kind of land those permissions were granted (brownfield or greenfield land).

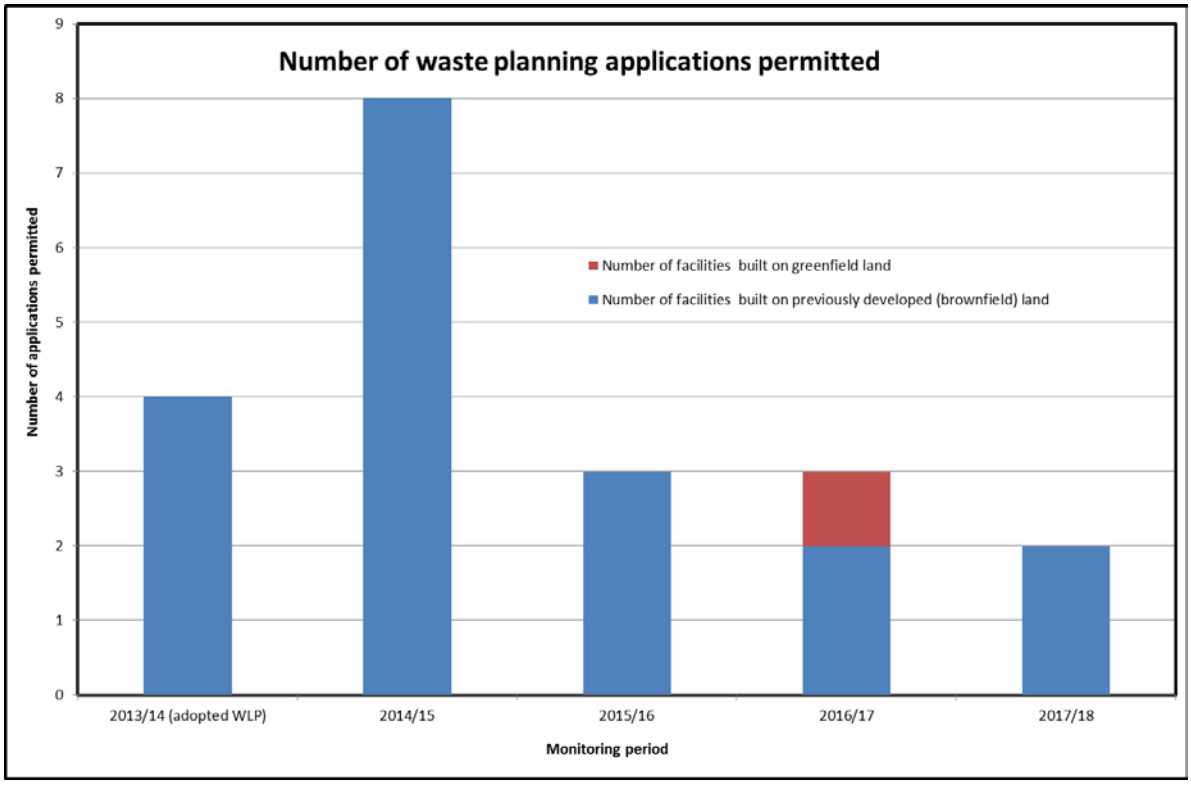

Figure 7: Number of waste planning applications permitted

Figure 7 shows that in all but one of the monitoring years, 100% of the planning applications permitted were on previously developed, brownfield land. During 2016/17, one application was permitted on previously undeveloped (greenfield) land. This was at Wicks Farm, Ford Lane, for an on-farm anaerobic digestion (AD) plant (WSCC/026/16/F), and permitted on the basis that it is small scale (less than 50,000tpa), serves a local need, and that a countryside location was considered appropriate for such development (see Paragraph 6.4.15 of the WLP).

Overall, the policy is performing with capacity increasing since the WLP was adopted and arisings generally being lower than capacity. It should be noted that the data on capacity does not include that for landfill/recovery on wastes.

It is concluded that Policy W3 continues to be relevant and effective.

Policy W4: Inert Waste Recycling

WLP Measure/Indicator	WLP Trend/Target
Number of applications for inert waste recycling permitted per annum	n/a
Recycling of inert waste (capacity, tonnes per annum, and percentage of total arisings)	Upward trend

During the five years since adoption of the WLP, a total of 10 planning applications have been permitted, with a peak in 2014/15 (six planning applications), and two in each of 2015/16 and 2016/17. There were no planning applications permitted in 2017/18.

Figure 8 sets out total inert waste recycling capacity, the amounts recycled in each of the monitoring years, and what percentage of total construction, demolition and excavation waste arisings were recycled.

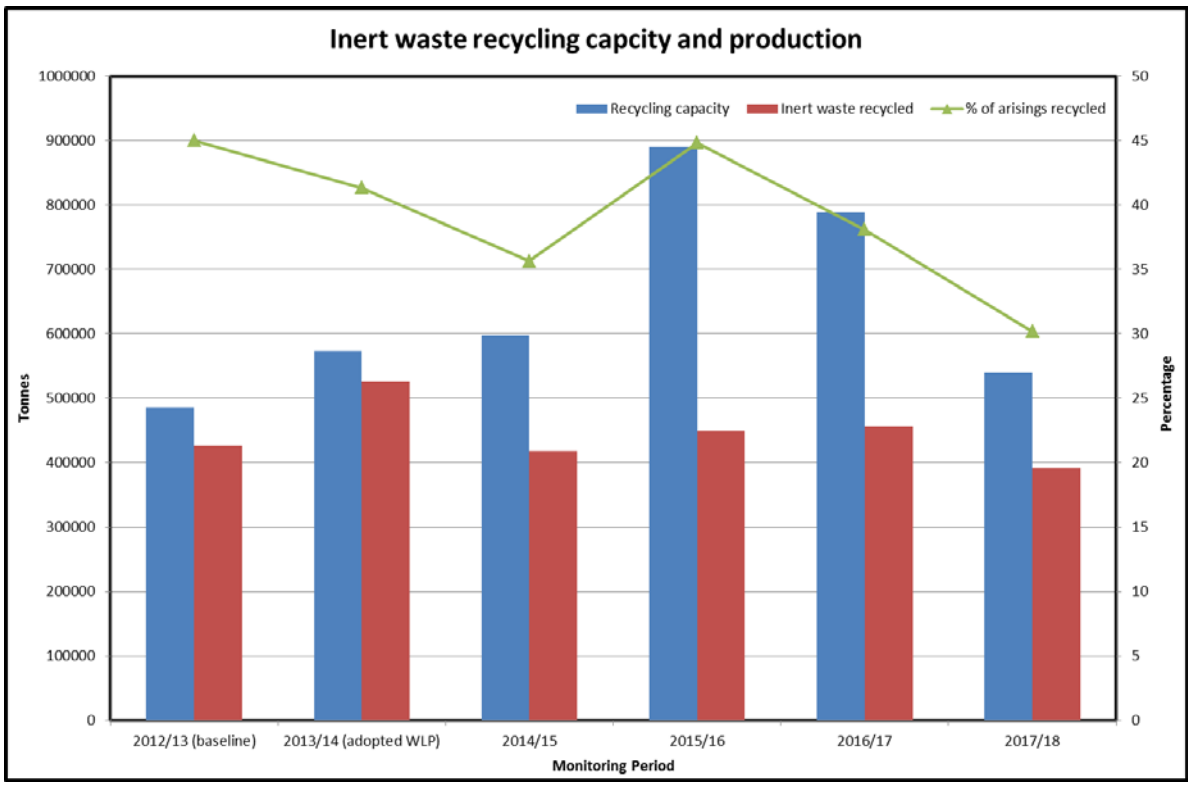

Figure 8: Inert waste recycling capacity and production

Figure 8 shows that recycling capacity is some 50,000 tonnes higher than the baseline year (2012/13). In the intervening years, capacity peaked (in 2015/16) at 890,375 tonnes, before a decline to the 2017/18 level. This is not surprising, as activities of this type tend to be temporary in nature, located on landfill sites or quarries (for producing restoration materials) and once these sites are restored, any associated recycling capacity ceases to exist. In 2017/18, there was a significant reduction in capacity (circa 230,000 tonnes) due to the closure of two recycling operations at former quarries that have now been restored.

Figure 8 also shows the amount of inert waste recycled annually since adoption of the WLP. It must be noted that the baseline data (2012/13) was based on a 2009/10 methodology to calculate capacity and management method (AEAT Waste Forecasts 2012). This data was subsequently discounted during the WLP examination, when the then more robust methodology ('point of production') was considered to be a more accurate way to calculate inert waste data. This updated data (2012) only produced an updated arising figure (949,000 tonnes, down from 1,340,000). In order to calculate an amount recycled, an arbitrary figure of 45% was applied, using the Capita Symonds (2007) methodology, which was based on CD&E waste surveys in England for the years 2001, 2003, and 2005 – a method that has not been applied since.

For the purpose of reviewing Policy W4, the baseline data (2012/13) is not considered to provide an accurate reflection of recycling activities, and therefore the 2013/14 data has been applied as the starting point for the review. From

2013/14, a further updated methodology ('point of management') has been applied. The data shows that recycling was generally stable (between 36% and 45% of total arisings) during the four-year period between 2013/14 and 2016/17. In 2017/18, recycled aggregate production fell to a low of 30% of total arisings.

The reduction in amounts recycled in 2017/18 also saw an increase in inert material marked as going to 'landfill'. However, it must be noted that some 266,000 tonnes of inert materials were sent to non-inert landfill sites for restoration purposes. This may indicate that there was an increased need for restoration material, hence the reduction in the amount recycled.

Overall, inert recycling capacity does not tend to operate at maximum levels, and there is currently headroom of circa 150,000 tonnes of capacity, compared to the amounts of inert waste recycled.

Although there has been a small reduction in the amounts of inert waste being recycled, and also the total capacity, it is considered that this is due to unique circumstances (loss of two temporary sites, and the restoration of a number of sites through inert recovery) rather than as a result of failure of the WLP policy. The policy is considered to remain relevant and effective, as demonstrated by the fact that 10 planning permissions for inert waste recycling have been permitted since adoption. The allocations in the WLP provide potential for further capacity, whilst continued mineral extraction in West Sussex means there will continue to be a need to restore quarries, therefore aggregate recycling operations will continue to come forward (and be determined against this and other policies in the plan).

It is concluded that Policy W4 continues to be relevant and effective.

Policy W5: Open Windrow Composting

WLP Measure/Indicator	WLP Trend/Target
Number of applications for open windrow composting permitted per annum	n/a
Recycling of green wastes (capacity, tonnes per annum, and percentage of total arisings)	Upward trend

Since adoption of the WLP, no planning applications were received for open windrow compositing. During that time, there has been a small reduction in capacity, as shown in Figure 9, due to the loss of one site in 2016/17.

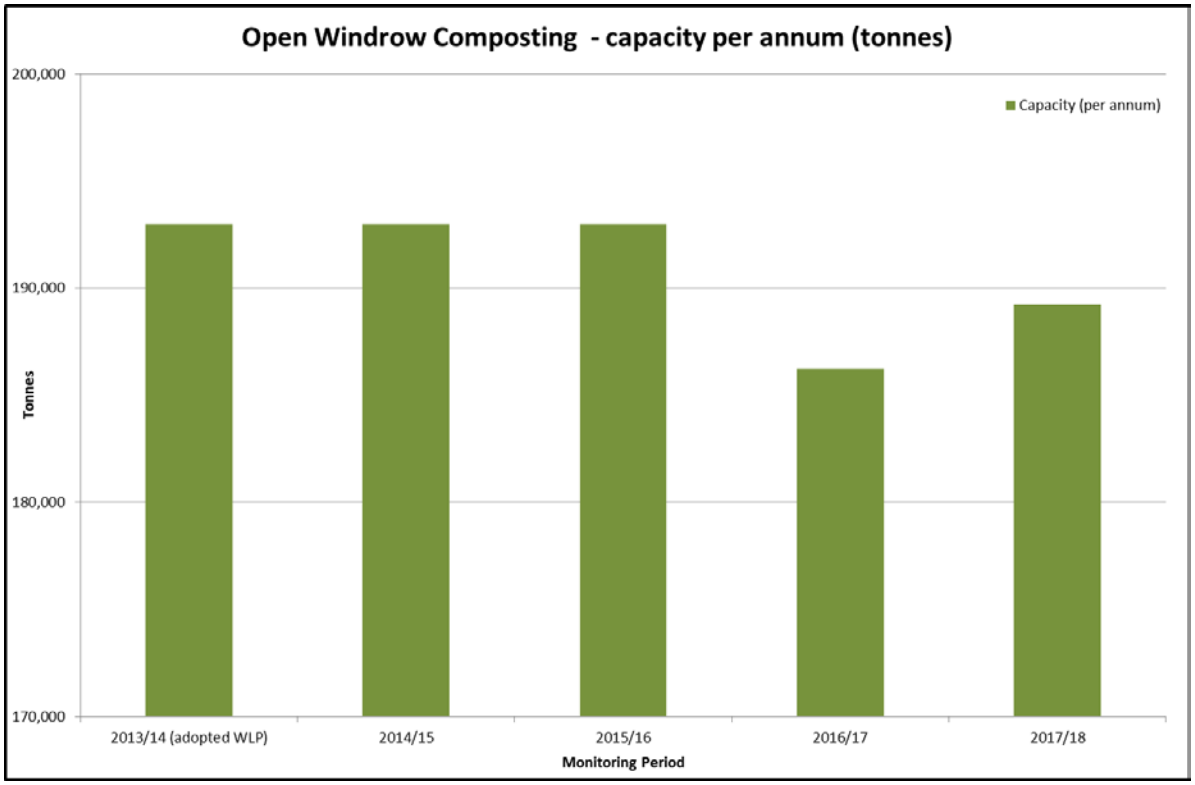

Figure 9: Open windrow composting - capacity per annum (tonnes)

It is difficult to ascertain how much recycling is taking place of green waste, therefore total capacity provides a good indicator of whether or not there is an issue. Although there has been a reduction in capacity, it is not a significant fall (3,750 tonnes), and there has been no interest from the waste industry for any new such facility or site.

Policy W5 is considered to be relevant and effective as it is still consistent with national policy and it would allow for the granting of permission if the industry pursues further capacity in future.

It is concluded that Policy W5 continues to be relevant and effective.

Policy W6: Management of Wastewater and Sewage Sludge

WLP Measure/Indicator	WLP Trend/Target
Number of applications for new or extended wastewater treatment works permitted per annum	No trend identified
Management of wastewater and sewage sludge (capacity, tonnes per annum)	No net loss

Owing to extensive permitted development rights available to sewerage undertakers, the majority of upgrade works within existing treatment works and other below ground development does not require express planning permission. The exception is the provision of new buildings, or development requiring Environmental Impact Assessment (EIA). Accordingly, during the five-year period since adoption of the WLP, a number of planning applications were approved, the majority relating to ancillary buildings required in association with wider improvement works being carried out with the benefit of permitted development. More recently, and following extensive upgrade works at the Tangmere Waste Water Treatment Works (WWTW), four EIA planning applications were approved in 2018 for a new 10km sewer pipeline and three pumping stations between the west of Chichester and Tangmere WWTW, which will serve allocated strategic housing sites around Chichester.

It is concluded that Policy W6 continues to be relevant and effective.

Policy W7: Hazardous and Low Level Radioactive Waste

WLP Measure/Indicator	WLP Trend/Target
Number of applications for the management of hazardous waste permitted per annum	n/a
Management of hazardous waste (capacity, tonnes per annum)	No net loss

During the five-year period since adoption of the WLP, there have been no planning applications for the management of hazardous and low level radioactive waste received by the Authorities. There has therefore been no change in capacity.

Policy W6 is considered to be relevant and effective as it is still consistent with national policy and it would allow for the granting of permission if the industry pursues capacity in future.

It is concluded that Policy W7 continues to be relevant and effective.

Policy W8: Recovery of Operations involving the Depositing of Inert Waste to Land

WLP Measure/Indicator	WLP Trend/Target
Number of applications for depositing of inert waste to land permitted per annum	n/a
Depositing of inert waste to land (capacity, tonnes per annum, and percentage of total arisings)	Trend within capacity set out within Policy W1

During the five-year period since adoption of the WLP, there were a total of 18 planning applications considered by the authorities for recovery operations involving the depositing of inert waste to land (see Figure 10). Of these, nine were permitted the inert recovery of just over 1.2mt in total. At the point of adoption of the Plan, the inert recovery capacity was 3.9mt.

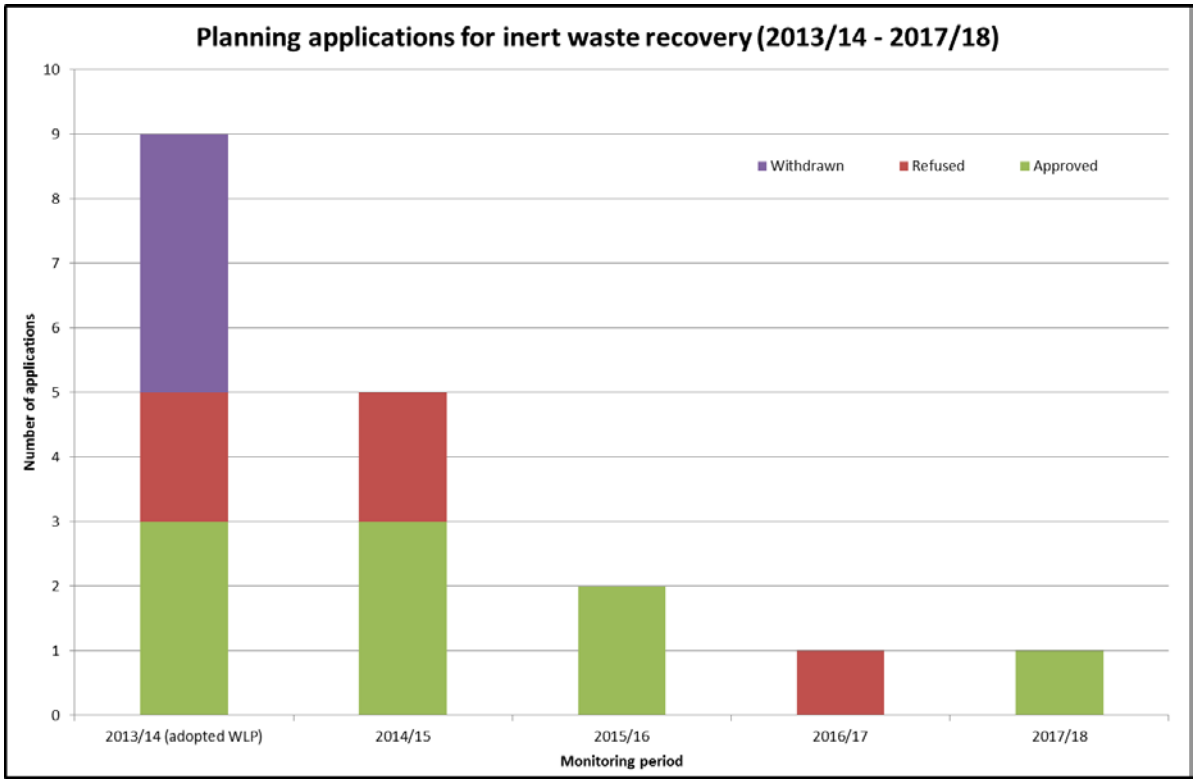

Figure 10: Planning applications for inert waste recovery (2013/14-2017/18)

Figure 11 sets out how inert recovery capacity has changed since adoption of the WLP. It sets out the annual amounts permitted (through Policy W8), and the annual amounts of inert waste recovered (based on the total capacity change, averaged annually over the five years). These estimates are required as it is difficult to ascertain the exact amounts of waste being deposited once a site is permitted. Updated information is provided annually through waste surveys, and the outcomes of monitoring site visits and discussions with operators.

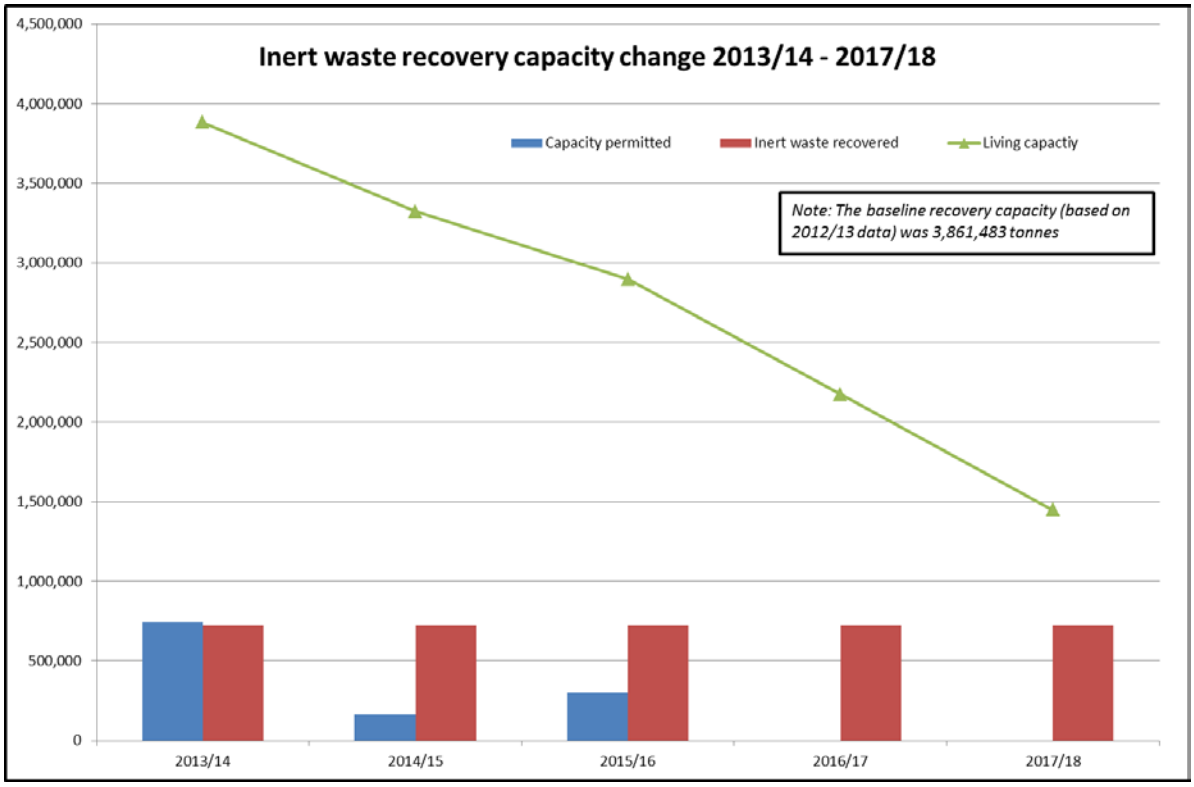

Figure 11: Inert waste recovery capacity change 2013/14-2017/18

Figure 11 shows that there has been a general decline in total recovery capacity, whereby during the five-year period since adoption, some 1.2mt of capacity was permitted, whilst some 3.6mt of inert waste has been deposited/recovered. This means, at the end of 2017/18, the total inert recovery capacity had fallen from 3.9mt (in 2013/13) down to 1.5mt. The estimates suggest that, based on current fill rates (as set out in Appendix C of the AMR for 2017/18), capacity could be exhausted by 2020 if filling continued at existing rates and no new permissions are granted.

It should be noted that a planning application has been approved (in March 2019) for inert recovery for restoration at Sandgate Park Quarry to take 1.8mt of waste. This increases current capacity 3.2mt, although not taking account of recovery during 2018/19, which will be captured via the next AMR covering that period.

In general, the Authorities continue to assess planning applications for inert recovery projects, with 18 in the five years since adoption of the WLP, and 53 since 2004.

Inert waste, as with all waste, moves across administrative boundaries. Therefore, the Authorities are working with other South East Waste Planning Authorities, through the South East Waste Planning Advisory Group, to prepare a Joint Position Statement on inert recovery and landfill. This statement will help understand the wider South East situation for these kinds of operations. Whilst West Sussex continues to see minerals extraction take place, the amount of restoration projects involving large amounts of inert recovery are declining in the South East. However, there are other types of recovery projects, associated with landraise, landscaping projects, and the creation of screening bunds that continue to come forward.

There is currently sufficient inert recovery capacity in the Plan area to last around five years. Policy W8 is considered to be consistent with national policy. The policy is considered to be relevant and effective as it allows for the continued permitting of recovery projects as and when they come forward, if they are consistent with policies in the WLP. Inert recovery capacity, and the expected inert waste arisings, will continue to be monitored via the AMRs.

It is concluded that Policy W8 continues to be relevant and effective.

Policy W9: Disposal of Waste to Land

WLP Measure/Indicator	WLP Trend/Target
Number of applications for landfilling per annum, and percentage of total arisings	n/a
Disposal of waste to land (capacity, tonnes per annum, and percentage of total arisings)	Downward trend (tpa) (percentage of total waste)

During the five-year period since adoption of the WLP, there have been six planning applications determined by the Authorities, all of which were for amendments to existing/closed landfill sites (Horton, Lidsey, Brookhurst Wood, and Windmill landfills), with no planning applications for new landfill sites. The policy is consistent with national policy, and no issues have been raised by the Development Management teams.

Policy W9 covers all streams of waste disposal activities (MSW, C&I, and CD&E), however assessing the streams together is problematic, particularly for CD&E waste, as it is now rarely landfilled, and instead is recovered through being used in a beneficial way. Waste data collected by the EA, via the waste permitting regime, in some instances captures recovery operations as landfill, which can give the impression that more waste is being disposed of than is actually the case. The data on this policy is therefore split and presented separately.

MSW/C&I Waste (non-hazardous landfill)

The MSW/C&I waste streams principally result in the landfill of non-hazardous waste. Figure 12 shows the MSW and C&I waste arisings, and the ways in which it has been managed in any given monitoring year.

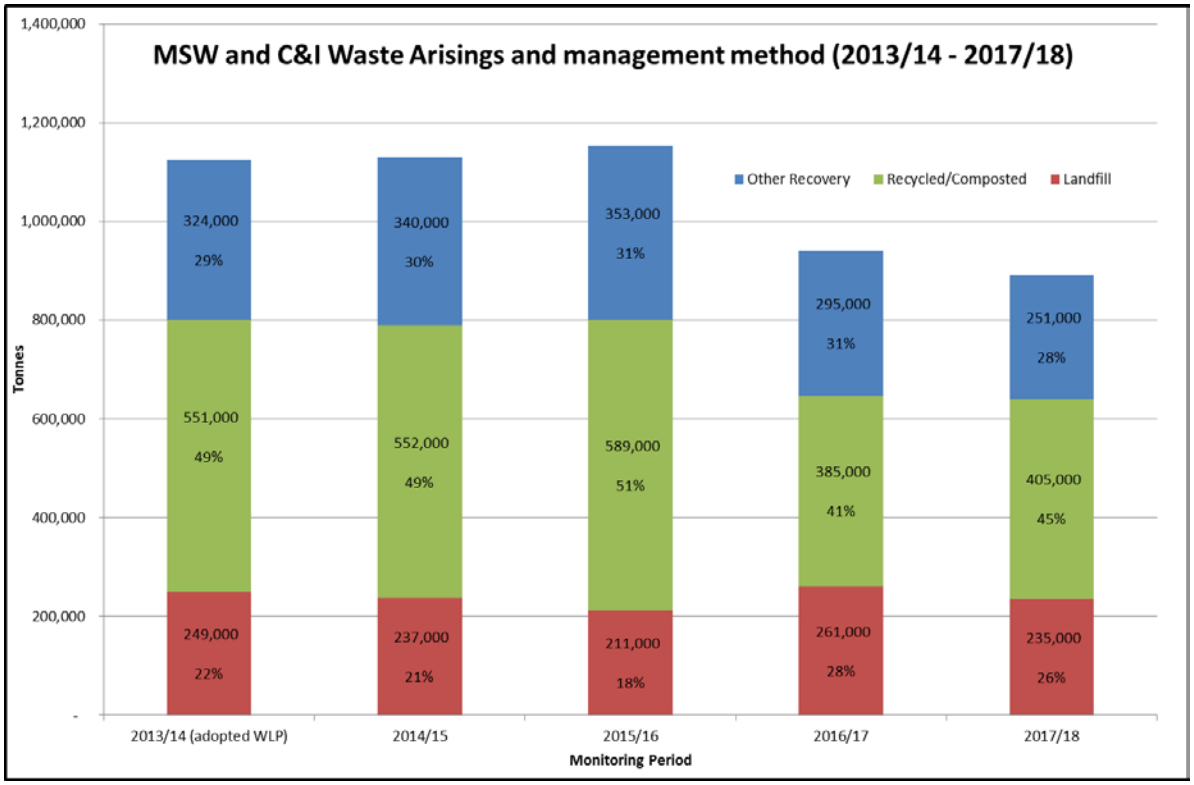

Figure 12: MSW and C&I arisings and management method (2013/14-2017/18)

Figure 12 shows that during the first three years since adoption of the WLP, the percentage of arisings going to landfill was falling (in line with the indicator). In 2016/17 and 2017/18, the percentage of arisings going to landfill was higher, however overall arisings were lower. In 2017/18, 235,000 tonnes of waste was landfilled, representing 26% of all arisings, in 2013/14 more waste was landfilled (249,000 tonnes) which was only 22%, and in 2014/15, 237,000 tonnes only represented 21% of arisings. Landfill capacity at West Sussex sites has now been exhausted, and during the last two years, the filling was being completed (namely Lidsey and Brookhurst Wood landfills), which indicates the reason for the increases in the amounts being deposited in order to complete the sites as required.

For CD&E waste, there are no dedicated inert landfill sites. Following adoption of the WLP, there was initially an annual decline in the amount of CD&E waste arisings in West Sussex, falling to a low of around 1 million tonnes. However, in 2016/17 and 2017/18, there have been increases in CD&E waste arisings. Figure 13 shows the amount of CD&E waste that has been arising, and the ways in which it has been managed in any given monitoring year. It is important to note that CD&E waste is considered to be made up of around 75% of inert waste, and the remainder being a mix of wood, plastics, metals, and other materials associated with construction and demolition activities.

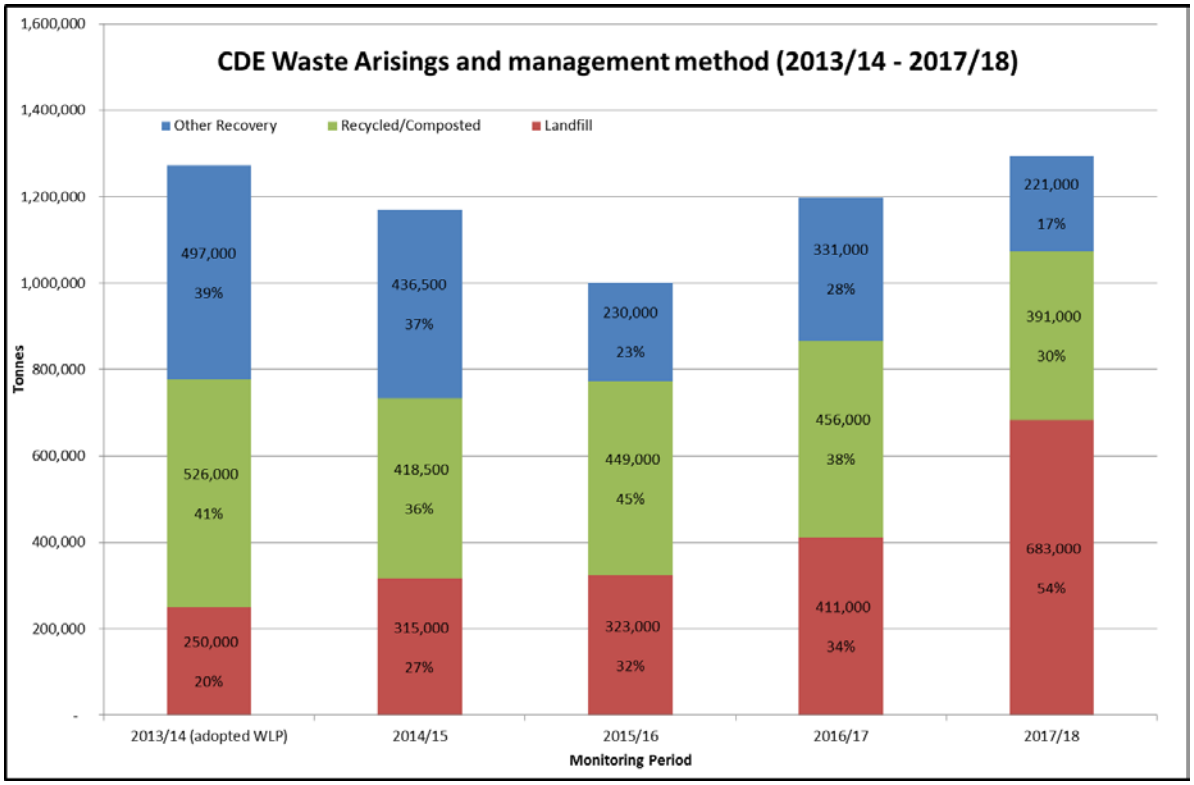

Figure 13: CD&E waste arisings and management method (2013/14-2017/18)

Figure 13 shows that the amounts (and percentages) of CD&E waste going to landfill have been increasing annually. As set out earlier, there is cross-over between 'recovery' and 'landfill', particularly for inert waste, whereby the EA permitting data presents the deposit of inert waste as 'landfill' on occasions, when it would be considered a recovery operation (in line with Policy W9) by the authorities. For example, in 2017/18, of the 683,000 tonnes marked as landfill, around 270,000 tonnes was deposited at non-inert landfills for restoration

purposes. Furthermore, around 150,000 tonnes was deposited at Golding Barn Quarry, whilst just over 100,000 tonnes was deposited at Boxgrove Quarry, both quarries that were being restored.

In order to understand the issue of landfill on a wider scale, the authorities, through work with the South East Waste Planning Advisory Group, are working together on position statements for both non-hazardous landfill, and inert landfill, with a view of understanding the wider issues in the South East related to planning. This is particularly important as waste travels beyond administrative borders, and in some areas, there is a need to export waste for landfill, including from London.

In West Sussex, non-hazardous waste landfill capacity has now been exhausted, as shown in Figure 14, following the close of both Lidsey and Brookhurst Wood landfills. There is an allocation within the WLP (Policy W10) for further landfill at Brookhurst Wood that would provide a further 0.86mt of capacity, should the waste industry decide it is needed. In the meantime, it is anticipated that residual waste will be exported to other landfills or be dealt with through recovery.

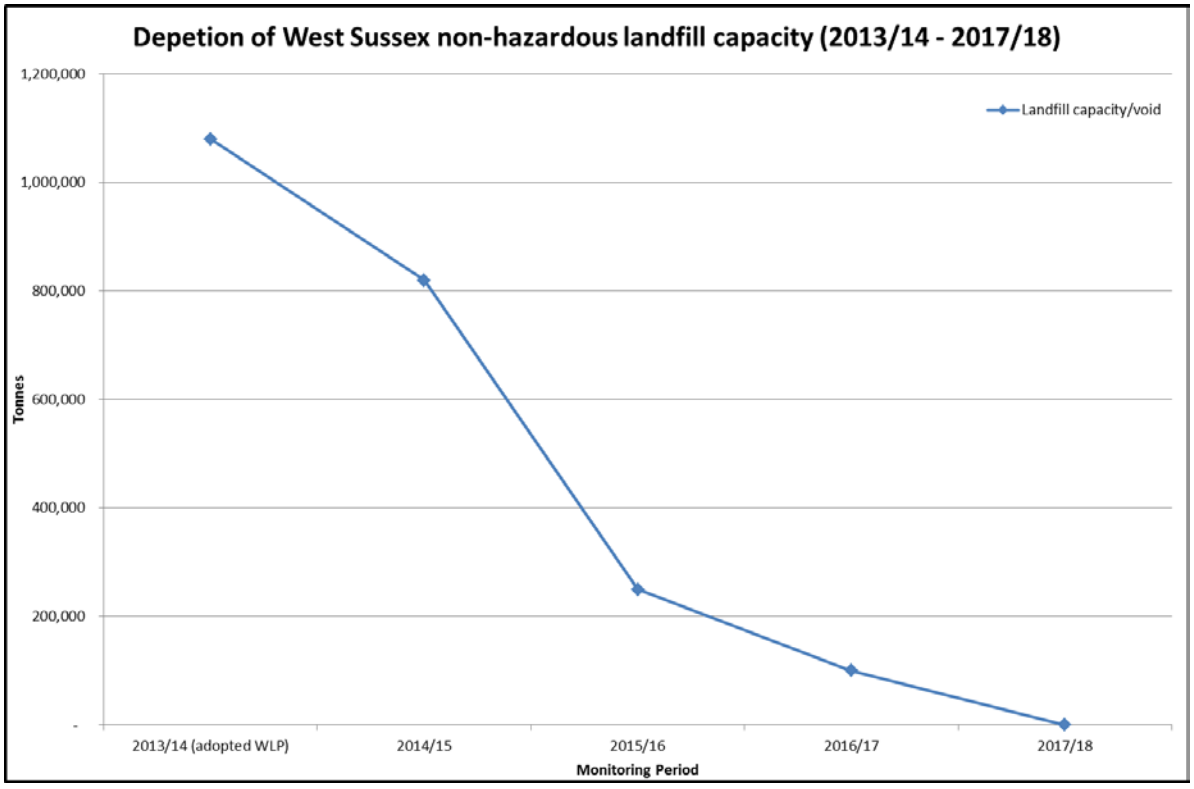

Figure 14: Depletion of West Sussex non-hazardous landfill capacity (2013/14-2017/18)

It is concluded that Policy W9 continues to be relevant and effective.

Policy W10: Strategic Waste Site Allocations

WLP Measure/Indicator	WLP Trend/Target
Number of applications for waste management facilities on allocated sites permitted per annum	n/a
Types of facilities permitted on allocated sites per annum	In line with the requirements of the Plan area as set out in Policy W1.

The monitoring reports provide an annual update on the waste site allocations, and their status. See Table 5 (which is Table 14 from the AMR 2017/18).

Table 5: Waste allocations update

Policy W10 Allocations	Potential Capacity	Planning History since Adoption of the WLP
Site North of Wastewater Treatment Works, Ford	Up to c.250,000tpa	Permission granted (WSCC/096/13/F) for a waste treatment facility.
Hobbs Barn, near Climping	c.50,000tpa	Permission granted for a waste transfer station (WSCC/067/15/CM)
Fuel Depot, Bognor Road, Chichester	c.50,000tpa	Temporary permission granted for a waste transfer station (WSCC/058/13/O) – Permission now lapsed. Chichester District Council approved a hybrid outline planning application for the redevelopment of the Fuel Depot site (14/04284/OUT). WSCC raised no objection as the proposal excluded an area of the Fuel Deport (north east area) for future waste uses, and therefore was consistent with Policy W10. A further hybrid application is currently being considered by Chichester District Council at the Fuel Depot (19/00619/FUL), which excludes the north east area for waste development.
Brookhurst Wood, near Horsham	c.300,000tpa	The site was granted planning permission for a waste transfer facility to handle inert and non-inert wastes in July 2014, with a number of further planning applications approved since (amendments). Current capacity is 230,000 tonnes per annum. Site subject to appeal for an application for Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure (WSCC/015/18/NH). The applicant sought permission for the redevelopment of a site for energy from waste, but not an increase in capacity, which was refused by West Sussex County Council.
Land West of Wastewater Treatment Works, Goddards Green	c.200,000tpa	No application to date.
Extension to Brookhurst Wood Landfill, Horsham	860,000 tonnes	No application to date for landfill. Permission granted for the Installation and operation of an aggregate treatment and recycling facility (WSCC/003/14/NH).

Table 5 shows that three of the six WLP allocations have come forward and been permitted for permanent waste facilities (site north of waste water treatment works at Ford, Hobbs Barn, and Brookhurst Wood). The capacity of these facilities is included within the overall capacity calculations (Table 10 AMR 2017/19). If the appeal at Brookhurst Wood, for a Recycling, Recovery, and Renewable Energy Facility, is allowed, it may result in the current transfer capacity becoming recovery capacity.

Two sites remain unpermitted for permanent built waste facilities with a total potential capacity of 250,000 tonnes per annum (Fuel Depot site or Goddards Green). These sites are still considered suitable for waste facilities, in line with the requirements of the WLP.

An assessment of the need (Policy W1) has shown that there are still shortfalls in current capacity for the plan period (based on the high growth scenarios); therefore the allocations are considered necessary to provide for any increases in waste that may occur. The policy is considered to be relevant and effective.

No application has come forward for the extension to Brookhurst Wood Landfill as yet. Planning permission was granted on the area for aggregate recycling, which does not prejudice the landfill from coming forward during the plan period.

Table 1 shows that there is still circa 140,000tpa shortfall (against the baseline calculations) to be permitted. Table 3 shows that waste arisings could be some 200,000 tonnes higher than originally forecast when the WLP was prepared. In total, therefore, the shortfall may be as high as 340,000 tonnes. However, it is important to note that the increase in arisings is likely to be as a result of CD&E waste, for which allocations were not included for disposal or recovery (see the review of Policy W1). Calculations suggest that around 53% of CD&E waste arisings go to permanent deposit (landfill or recovery) which would result in a shortfall of 170,000 tonnes to be managed at built waste facilities and therefore there would be sufficient capacity at the remaining allocated waste sites.

Policy W10 is considered to be relevant and effective, as it is consistent with national policy and the allocations would allow for further capacity (both built waste, and landfill) to be permitted if the waste industry pursues it.

It is concluded that Policy W10 continues to be relevant and effective.

Policy W11: Character

WLP Measure/Indicator	WLP Trend/Target
Number of applications refused on character grounds per annum (including percentage against total applications received)	No trends/targets identified, as it is not expected that unacceptable proposals will progress to planning applications.

Since adoption of the WLP, a total of five planning applications have been refused on character grounds, whilst none have been permitted contrary to officer advice. There have been no changes to national policy that would make this policy out of date.

It is concluded that Policy W11 continues to be relevant and effective.

Policy W12: High Quality Developments

WLP Measure/Indicator	WLP Trend/Target
Number of applications permitted that include low carbon energy initiatives/sources (including percentage against total applications received)	No trends/targets identified, as it is not expected that unacceptable proposals will progress to planning applications.

Since adoption of the WLP, a total of three planning applications have been permitted that include low carbon energy initiatives. There have been no changes to national policy that would make this policy out of date.

It is concluded that Policy W12 continues to be relevant and effective.

Policy W13: Protected Landscapes

WLP Measure/Indicator	WLP Trend/Target
Number of applications refused in the AONBs and SDNP (including percentage against total applications received) for large scale and small scale facilities	No trends/targets identified, as it is not expected that unacceptable proposals will progress to planning applications.
Number of applications for depositing of inert waste to land permitted per annum within protected landscapes	No trends/targets identified, as it is not expected that unacceptable proposals will progress to planning applications.

Since adoption of the WLP, a total of five planning applications have been refused for waste developments in the AONBs or SDNP. Only one of the planning application was submitted during the five-year period (in 2013/14), for depositing inert waste in protected landscapes. There have been no changes to national policy that would make this policy out of date.

It is concluded that Policy W13 continues to be relevant and effective.

Policy W14: Biodiversity and Geodiversity

WLP Measure/Indicator	WLP Trend/Target
Number of applications refused on biodiversity and geodiversity grounds (including percentage against total applications received)	n/a
Number of applications with associated mitigation measures provided	No trends/targets identified, as it is not expected that unacceptable proposals will progress to planning applications.

Since adoption of the WLP, two planning applications have been refused for waste developments, on the grounds of impact on biodiversity and geodiversity. During that time, six permissions have been granted that include specific mitigation measures. There have been no changes to national policy that would make this policy out of date.

It is concluded that Policy W14 continues to be relevant and effective.

Policy W15: Historic Environment

WLP Measure/Indicator	WLP Trend/Target
Number of applications refused on historic grounds (including percentage against total applications received)	No trends/targets identified, as it is not expected that unacceptable proposals will progress to planning applications.

Since adoption of the WLP, no planning applications have been refused for waste developments on historic grounds.

There is concern that the policy does not specifically refer to heritage setting. This was considered when preparing the Joint Minerals Local Plan, whereby a change was made following the examination hearing sessions to specifically make reference to setting in the policy text of the Joint Minerals Local Plan.

Reference to setting is included in the NPPF (including within previous versions), of the importance of setting, particularly in Paragraphs 190 and 194. Furthermore, the definition of 'setting of assets' is provided in Annex 2 of the NPPF.

The supporting text of Policy W15 (Paragraph 8.6.2) does specifically mention the importance of setting;

> "Heritage assets are an irreplaceable resource and should be conserved in a **manner appropriate to their significance**. The significance of any heritage assets should be assessed and described in a manner appropriate to their importance to enable the impact of a proposal upon the asset **(and the setting of a heritage asset)** to be understood. Significance derives not only from a heritage asset's physical presence **but also from its setting, and that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting**."

Meanwhile, Planning Practice Guidance (PPG) on conserving and enhancing the historic environment states that when considering the 'significance' of assets, "Being able to properly assess the nature, extent and importance of the significance of a heritage asset, **and the contribution of its setting**, is very important to understanding the potential impact and acceptability of development proposals" (Paragraph 009).

When considering 'harm', PPG states (Paragraph 017) that, "What matters in assessing if a proposal causes substantial harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, **but also from its setting**". PPG also provides further information on the importance of setting (Paragraph 013).

With the supporting text and PPG both stating that setting requires consideration, coupled with the fact that there have not been any issues raised, whereby there has been loss of an heritage asset due to setting not being considered, it is considered that the policy remains relevant and effective.

It is concluded that Policy W15 continues to be relevant and effective.

Policy W16: Air, Soil, and Water

WLP Measure/Indicator	WLP Trend/Target
Applications refused on air quality, soil, and water grounds (including percentage against total applications received)	No trends/targets identified, as it is not expected that unacceptable proposals will progress to planning applications.

Since adoption of the WLP, only one planning application has been refused for waste developments on grounds of impact on air quality, soil, or water. There have been no changes to national policy that would make this policy out of date.

It is concluded that Policy W16 continues to be relevant and effective.

Policy W17: Flooding

WLP Measure/Indicator	WLP Trend/Target
Applications refused on flooding grounds (including percentage against total applications received)	No trends/targets identified, as it is not expected that unacceptable proposals will progress to planning applications.
Permissions granted with associated mitigation measures (including percentage against total applications received)	No trends/targets identified, as it is not expected that unacceptable proposals will progress to planning applications.
Number of applications refused/permitted in flood risk zones 2b and 3 (including percentage against total applications received)	No trends/targets identified, as it is not expected that unacceptable proposals will progress to planning applications.

Since adoption of the WLP, no planning applications have been refused on flooding grounds. A total of 12 have been permitted with mitigation measures. For development in flood risk zones 2b and 3, only one application was refused within those areas, whilst four were permitted.

There have been no changes to national policy that would make this policy out of date.

It is concluded that Policy W17 continues to be relevant and effective.

Policy W18: Transport

WLP Measure/Indicator	WLP Trend/Target
Number of applications refused on transport grounds (including percentage against total applications received)	No trends/targets identified, as it is not expected that unacceptable proposals will progress to planning applications.

Since adoption of the WLP, five planning applications have been refused on transport grounds. There have been no changes to national policy that would make this policy out of date.

It is concluded that Policy W18 continues to be relevant and effective.

Policy W19: Public Health and Amenity

WLP Measure/Indicator	WLP Trend/Target
Number of applications refused on health and amenity grounds (including percentage against total applications received)	No trends/targets identified, as it is not expected that unacceptable proposals will progress to planning applications.

Since adoption of the WLP, six planning applications have been refused on public amenity and health grounds. There have been no changes to national policy that would make this policy out of date.

It is concluded that Policy W19 continues to be relevant and effective.

Policy W20: Restoration and Aftercare

WLP Measure/Indicator	WLP Trend/Target
Applications permitted with restoration and aftercare conditions (including percentage against total applications received)	No trends/targets identified, as it is not expected that unacceptable proposals will progress to planning applications.

Since adoption of the WLP, 23 planning applications have been permitted with restoration and aftercare conditions. There have been no changes to national policy that would make this policy out of date.

It is concluded that Policy W20 continues to be relevant and effective.

Policy W21: Cumulative Impact

WLP Measure/Indicator	WLP Trend/Target
Number of applications refused on cumulative impact grounds (including percentage against total applications received)	No trends/targets identified, as it is not expected that unacceptable proposals will progress to planning applications.

Since adoption of the WLP, only one planning application has been refused for waste developments on cumulative impact grounds. There have been no changes to national policy that would make this policy out of date.

It is concluded that Policy W21 continues to be relevant and effective.

Policy W22: Aviation

WLP Measure/Indicator	WLP Trend/Target
Number of applications refused on aviation grounds (including percentage against total applications received)	No trends/targets identified, as it is not expected that unacceptable proposals will progress to planning applications.

Since adoption of the WLP, there have been no planning applications refused on aviation grounds. There have been no changes to national policy that would make this policy out of date.

It is concluded that Policy W22 continues to be relevant and effective.

Policy W23: Waste Management within Development

WLP Measure/Indicator	WLP Trend/Target
Applications permitted with site waste management plans (including percentage against total applications received)	Upward trend of applications permitted, as a percentage of total. All Local Plans to recognise the importance of managing waste arising from development projects. This will be reflected in the AMR.

Since adoption of the WLP, there has been one planning application granted that includes a waste management plan, and no upward trend. However, it should be noted that all Local Plans in West Sussex are required to recognise the importance of managing waste arising from development projects.

There have been no changes to national policy that make this policy out of date.

It is concluded that Policy W23 continues to be relevant and effective.

4. Conclusions

The review of the WLP has identified that, since adoption of the Plan in April 2014, there have been no substantive changes in national or local circumstances, and the policies have generally performed as expected. They are still considered to be consistent with national policy, relevant and effective, and working to achieve the vision and strategic objectives of the Plan.

The main conclusions from this review are as follows:

- The shortfalls in waste management capacity identified in Policy W1 have fallen as permissions have been granted and that the remaining shortfall (of circa 140,000 tonnes) can be met by the two remaining allocations.
- The updated demand forecasts show that by 2031, waste arisings may be 194,000 tonnes higher than initially forecasted (high growth scenario). However, the vast majority of this is likely to be CD&E waste. CD&E waste continues to be managed via a combination of permanent and temporary recycling sites, as well as inert recovery projects (landscape engineering, or quarry/sandpit restorations), for which the WLP did not make allocations as these site types come forward on an ad hoc basis. This view remains unchanged and is supported by the changes in capacity seen since adoption of the WLP.
- No safeguarded waste sites have been lost.
- There is an upward trend for facilities being built on brownfield land.
- Inert waste continues to be managed higher up the waste hierarchy, with recycling and recovery being the main management method.
- Although non-hazardous landfill capacity has depleted to zero, an allocation for further landfill remains in the Plan, and the Authorities (through the DtC) continue to monitor the situation in the South East.
- In general, the development management policies are working effectively.
- There is some concern about Policy W15. However, at this time, it is considered that the exclusion of reference to 'setting' within the policy does not preclude it from consideration when making planning decisions because it is referenced in national policy. Therefore, the policy it is still considered to be relevant and effective.

Therefore, the overall conclusion is that the West Sussex Waste Local Plan 2014 is still effective and relevant and it does not need to be updated.