1.2 Thirty two respondents made around fifty comments on the Proposed Submission Waste and Minerals Plan.

1.3 Representations on soundness and legal compliance were received from:

- Days Aggregates,
- DK Symes on behalf of Dudmans,
- Essex County Council,
- Hove Civic Society,
- Lewes FoE ,
- MJCA on behalf of Ibstock,
- MPA,
- Northamptonshire County Council,
- Quarryplan on behalf of Tarmac,
- Rother DC,
- Staffordshire CC,
- Surrey County Council
- Ticehurst PC,
- Wealden DC,
- Friends of Lewes
- Cllr Living (Peacehaven TC, but responding as an individual)
- 2 x members of public (living near Pebsham)

1.4 Letters of support (or stating no intention to comment) were received from:

- Deanland Wood Park,
- Highways Agency,
- Horsham DC,
- Kent County Council,
- Laughton PC,
- Leicestershire County Council,
- Lewes District Council,
- Marine Management Organisation,
- Natural England,
- Rotherfield PC,
- Southern Water,
- West Sussex County Council,
- Rabbit Skips,
- Environment Agency,
- BALI

1.5 Comments querying soundness and legal compliance have been summarised in the three tables below:

1) County, District or Borough Councils

2) Town Council, Parish Council, Civic Societies

3) Industry, Other

Comments querying soundness and legal compliance

1) County, District or Borough Council	Summary of comments		
Essex County Council	Concern over information about landfill – stress that ECC are not willing to provide landfill for the Plan Area.		
Kent County Council	Requested some minor factual changes.		
Northamptonshire County Council	Hazardous Waste policies are not appropriate.		
Rother District Council	Support for no allowance made for residual waste from London. Consider Plan is not sound or legally compliant in respect of Pebsham.	WMP5	Not justified, effective or consistent as policy should state that there will be no extension to Pebsham for additional landfill capacity and reference should be made to the Country Park.
		Saving of sites specific allocations from the Waste Local Plan	Site specific allocations can only be saved by application to the Secretary of State and consultation has been stifled.
		WMP14	Not justified, effective or consistent with national policy. Clarity sought that policy doesn't apply to former or redundant wharves.
Staffordshire County Council	Plan is unsound and not effective	Plan does not make sufficient provision for facilities to manage waste arising in the Plan Area and [or] achieve net self-sufficiency.	
Surrey County Council	Objection to exporting waste from Plan Area and not allocating Ashdown Brickworks. (WMP5 and WMP7)		
Wealden District Council	Support but seeking clarification, particularly on development management policies. WMP6a may not be specific enough to guide developers and future DPD.		

2) Town Council, Parish Council, Civic Society	Summary of comments
Hove Civic Society	Policy WMP2c Policy should express a firmer preference for CHP. Policy does not go far enough and references to power and heat should be inserted into policy wording.
Cllr Living (Peacehaven TC, but responding as and individual)	Plan should not go forward without consideration of waste water
Ticehurst PC	Resolution about water abstraction – no further development to use Bewl Water.

3) Industry/ Other	Summary of comments		
Days Aggregates	Partial support for WMP14, but request stronger wording relating to wharf related activities and joint working with West Sussex County Council.		
Dudmans (DK Symes)	Plan is not sound or legally compliant	WMP1	Not justified as policy does not give assurance that neighbouring counties would allow resource to be extracted
		WMP10/Para 4.7	Not consistent with NPPF as there is no recognition of differing market for soft sand
		WMP10 4.17	Not consistent with national policy as doesn't state that soft sand reserve will be exhausted in 3 years time and make necessary plans for future extraction
		WMP10	Not consistent with national policy as 7 year landbank will not be maintained
		WMP10 4.42	Not consistent with national policy as separate landbanks should be indentified
		WMP16	Not justified or consistent with national policy as restoration to agricultural land is not specifically considered
		WMP25	Not justified as Paragraph 6.27 does not recognise the specific locational constraints of minerals development
FoE Lewes	Plan is unsound based on comments made to previous consultations (no further detail)		
Ibstock (MJCA)	Ashdown Quarry should be considered as a site allocation for waste development. Do not believe that consultation on the removal of Ashdown Brickworks was carried out appropriately or in accordance with the SCI. Site could be suitable for other types of waste development (not just landfill). ESCC data and evidence is not robust.		
KTI Energy Limited (Dr Bill Temple-Pediani)	More emphasis on CHP, Pebsham and Hangleton Bottom should be explored to construct a waste processing plant producing fuel for export		
Light Bros	Support for WMP5 and WMP21 but concern the plan will prohibit waste development in the SDNP.		
MPA	Delete clause (c) of WMP1 as it is not required and there is no justification for the special treatment of soft sand quarries as these will need to comply with clause (b) and the tests in the NPPF.		
	WMP3 Amend Clause (c) to properly reflect NPPF para 143 bullet #2 as current policy is overly restrictive on use of primary materials		
	WP10 – support for meeting the apportionment [i.e. no request for reference to soft sand split].		
	WMP13 not in accordance with BGS guidance – and therefore unsound		
	WMP14 - support for policy but concern about timing of West Sussex Waste and Minerals Plans in relation to planning for Shoreham Port in a consistent manner over the Plan boundary.		
Southern Water	Support for waste water policies		
Tarmac (Quarryplan)	Plan is not sound	WMP1	Clause (c)is unsound as it places reliance for resource on adjoining

3) Industry/ Other	Summary of comments		
	or legally compliant		counties that are also within the SDNPA/AONB
		WMP3	Clause (c) is unsound as soft sand cannot be substituted
		WMP10	The policy is not effective although it may be sound. A stronger commitment to soft sand is required for the plan period.
		WMP13	The policy is unsound as it does not accord with BGS safeguarding guidance
Town and Country Planning Solutions	WMP6b and WMP21 – request new policy to consider expansions to sites beyond their existing boundaries WMP2c and WMP23b – consider use of woodchip to produce energy is hampered by policy and request deletion of wording “onsite generation of energy should not prejudice the movement of waste up the hierarchy”		
Members of the public	Two emails were received from the public stating the continued allocation of Pebsham made the plan unsound.		