Statement of Common Ground
Between Surrey County Council, West Sussex County Council and the South Downs National Park Authority
Concerning Strategic Policies for Waste Management

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1.0 Introduction and parties involved

1.1 National policy¹ states that: “Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.” and “Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans.”

1.2 National policy² expects that Local Plans will include ‘non-strategic’ and ‘strategic’ policies, and explains that strategic policies should....“set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:.....infrastructure” and this includes “for.....waste management” and “wastewater”.

1.3 National Policy states: “In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.”

¹ Paragraph 24 and 25 of the revised National Planning Policy Framework July 2018
² Paragraph 20 of the revised National Planning Policy Framework July 2018

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1.4 This document represents a Statement of Common Ground between Surrey County Council (SCC), West Sussex County Council (WSCC) and the South Downs National Park Authority (SDNPA) and concerns the strategic matter of waste management and helps ensure that sufficient waste management capacity is planned for in the plan areas of SCC and WSCC (including those parts of the SDNP that fall within West Sussex).

1.5 SCC, WSCC and the SDNPA are waste planning authorities in the south east of England (See Figure 1) with responsibility for planning for the future management of waste in their areas by including relevant strategic policies in their Local Plans. SCC adopted the Surrey Waste Plan in 2008 and WSCC and the SDNPA adopted its Waste Local Plan (plan period to 2031) in 2014. SCC is currently updating its planning policies on waste management by preparing the Surrey Waste Local Plan (plan period to 2033).

2.0 Signatories

2.1 This statement is agreed by SCC’s Cabinet Member for Environment and Transport, WSCC’s head of planning services and the SDNP’s Planning Policy Manager.

Councillor Mike Goodman, Cabinet Member for Environment and Transport, Surrey County Council (12 August 2019)

Michael Elkington, Head of Planning Services, West Sussex County Council (12 August 2019)

Lucy Howard, Planning Policy Manager, on behalf of the South Downs National Park Authority (6 August 2019)

3.0 Strategic Geography

3.1 Surrey and West Sussex (including those areas of the South Downs National Park within West Sussex) are bordering areas in the south east of England (see Figure 1). There are good road connections, in particular the M25, M23, A24, A3 and A23. Waste management data shows that a proportion of waste produced in Surrey is managed in West Sussex and a proportion of waste produced in West Sussex is managed in Surrey – the movements between Surrey and West Sussex for the years 2015, 2016 and 2017 are set out in Appendix 1. It is unclear exactly how much waste arising in the South
Downs National Park is managed in Surrey because records of waste managed relate to the county of production, and not whether the waste was produced in the National Park specifically. It is however known that waste from West Sussex is managed in Surrey and so it is reasonable to assume that a proportion of this waste was produced in the National Park. Cross boundary movement of waste is typical of the way in which waste is managed, as it is subject to market forces, having no regard to administrative boundaries. This is recognised in National Planning Policy for Waste that expects waste planning authorities to: “plan for the disposal of waste and the recovery of mixed municipal waste in line with the proximity principle, recognising that new facilities will need to serve catchment areas large enough to secure the economic viability of the plant.”

3.2 Movements of waste also take place between Surrey, West Sussex, the National Park and other counties and areas.
4.0 Strategic Matters

Net self sufficiency

4.1 Net self-sufficiency is a principle generally applied to waste planning that means an authority will plan for waste management facilities with sufficient capacity to manage an amount of waste that is equivalent to the amount predicted to arise within its area (irrespective of imports and exports). This helps ensure that sufficient waste management capacity is provided, as required by National Planning Policy for Waste.

4.2 The approach of net self-sufficiency in the south east was originally set out in the South East Plan and is now included in a Memorandum of Understanding3 (MoU) between SCC, WSCC, the SDNP, and other waste planning authorities in the South East. The MoU includes the following:

“The Parties recognise that there will be a degree of cross-boundary movement of waste. In light of this, the Parties will plan on the basis of net self-sufficiency which assumes that within each waste local plan area the planning authority or authorities will plan for the management of an amount of waste which is equivalent to the amount arising in that plan area. All parties accept that when using this principle to test policy, it may not be possible to meet this requirement in full, particularly for hazardous and other specialist waste streams.”

4.3 This approach is taken in the adopted West Sussex Waste Local Plan. This approach is also taken in the adopted Surrey Waste Plan (2008) and the emerging Surrey Waste Local Plan. These plans provide for the development of facilities that will manage waste produced within, and beyond, each area based on net self-sufficiency and in accordance with the waste hierarchy. Application of the waste hierarchy in determining waste capacity requirements ensures that waste is managed in the following order of preference:

Most sustainable
1. Prepared for reuse;
2. Recycled and/or composted;
3. Recovered in ways other than recycling/composting;
4. Disposed.

Least sustainable

4.4 SCC, WSCC and the SDNP recognise that the application of net self-sufficiency does not mean that an exact equivalent amount of waste, of the same type, will be transported in both directions between Surrey, West Sussex and the National Park. It is possible that particular commercial conditions exist which mean more waste is transported to one authority than the other. However net self-sufficiency means that such a situation would, in principle, be broadly balanced by movements between other

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3 Memorandum of Understanding between the Waste Planning Authorities of the South East of England, April 2017
authorities (including the areas of Hampshire, West Sussex and East Sussex not situated in the National Park).

4.5 Appendix 1 details reported movements of waste between Surrey and West Sussex (including the area of the SDNP within West Sussex). Each authority agrees that there are no planning reasons why these movements cannot continue in future subject to completion of certain landfills considered in the section below.

4.6 Currently more non-hazardous waste is exported from Surrey than is imported and a capacity gap exists for recovery of residual waste. Policies, including the allocation of land for the management of waste, are included in the emerging Surrey Waste Local Plan to address this matter. The West Sussex WLP seeks to achieve net self-sufficiency. In light of this neither SCC, WSCC or SDNPA are specifically planning to meet the waste management needs of other areas but they are not placing restrictions on development which constrain the origin of waste which may be managed by such development.

Non-Inert Waste Landfill

4.7 In Surrey, there is only one non-inert landfill remaining, at Patteson Court, which has planning permission requiring restoration by 2030. In West Sussex there are currently no active landfill sites receiving non-inert waste and significant quantities are exported to Patteson Court.

4.8 The demand for non-inert waste landfill has declined markedly in recent years and this trend is likely to continue. In light of this and the fact that no proposals for new sites (including proposals for allocations) have come forward, no new sites are proposed for allocation in the emerging Surrey Waste Local Plan. Policy W10 of the West Sussex Waste Local Plan allocates an extension to the Brookhurst Wood landfill site, which could provide 0.86mt of additional capacity and would last about 6 years based on previous fill rates. The declining amount of landfill capacity in West Sussex is consistent with the Waste Local Plan’s aspiration to achieve ‘zero waste to landfill in West Sussex by 2031’. However, proposals (including extensions or alterations of existing landfill sites) may come forward. The assessment of need for any new non-inert landfill would take account of whether there is already sufficient suitable capacity to deal with the residual waste. This assessment would take account of the fact that waste is transported increasingly long distances to landfill and so existing sites some distance away may be able to serve requirements in Surrey and West Sussex. This assessment will also need to consider impacts associated with vehicle movements.

4.9 SCC, WSCC and the SDNPA are collaborating on a Joint Position Statement concerning Non-hazardous Waste Landfill in the South East, that is being facilitated by the South East Waste Planning Advisory Group.

Safeguarding

4.10 Each authority seeks to safeguard waste management capacity in its own area through robust policies in their respective development plans on waste management, as required by national policy. This means the plans of both parties include a presumption
against granting permission for other forms of development which could result in reductions in physical or operational capacity (either by reductions in numbers and size of sites or by reduction in site throughput or restrictions on operation). Where development is proposed that would result in a reduction in capacity the need for that capacity in meeting the needs of other areas will be taken into account.

Green Belt
4.11 It is recognised that the prevalence of Green Belt within Surrey (as illustrated on Figure 1) presents a significant constraint, providing fewer opportunities for the management of waste which are consistent with national policy. Indeed, historic patterns of development suggest it is unlikely that the anticipated waste management needs of Surrey will be met without developing waste management facilities on Green Belt land. Allocations of land are therefore proposed in the emerging Surrey Waste Local Plan within the Green Belt. As waste management is considered inappropriate development within Green Belt, any proposals will only be considered acceptable if ‘very special circumstances’ are shown to exist, which clearly outweigh the harm caused to the Green Belt by reason of inappropriateness and any other harm, such as the preservation of openness of Green Belt designated land. One such very special circumstance could be an inability of the waste to be practically managed in other locations outside of the Green Belt, including those outside Surrey.

Areas of Outstanding Natural Beauty
4.13 An Area of Outstanding Natural Beauty is land protected by the Countryside and Rights of Way Act 2000. Surrey contains two Areas of Outstanding Natural Beauty, the Surrey Hills AONB and the High Weald AONB. West Sussex contains two AONBS, the Chichester Harbour AONB, and the High Weald AONB. The Countryside and Rights of Way Act (2000) sets out that local authorities must ensure that all decisions have regard for the purpose of conserving and enhancing the natural beauty of AONBs.

4.14 The presence AONBs within the areas of the parties to this SOCG is a constraint for the management of waste. Any proposal coming forward within the AONB should ensure that they have regard for the purpose of conserving and enhancing the natural beauty of the AONB in line with national and local policy. Proposals in Surrey or West Sussex for the management of waste that might otherwise need to be managed within an AONB in either authority area will be considered taking into account national policy on development within an AONB.

The South Downs National Park
4.15 National Parks are designated through the National Parks and Access to the Countryside Act 1949. The South Downs National Park is situated partly within West Sussex, and close to the boundary with Surrey.

4.16 The development of major waste management facilities within National Parks is not encouraged by existing policy. Smaller scale waste development may be suitable in a

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4 See Surrey County Council Site Identification and Evaluation Report [January 2019]
5 This is consistent with paragraphs 143 and 144 of the NPPF Statement of Common Ground Between Surrey County Council, West Sussex County Council and the South Downs National Park Authority Concerning Strategic Policies for Waste Management
National Park, in particular where it requires a countryside location or would serve a specific local need. Any proposal would be considered against the existing development plan, national policy and guidance.

5.0 Additional Strategic Matters
5.1 Common ground on other matters between SCC, WSCC and the SDNPA is set out in the Memorandum of Understanding between the Waste Planning Authorities of the South East of England, April 2017. This includes the following:
- Principle of planning for waste from London;
- implementation of the waste hierarchy;
- provision of capacity within waste local plans; and,
- recognition of waste industry influence on delivery of actual capacity.

5.2 SCC, WSCC and the SDNPA are also party to the following Joint Position Statements:
- Non-hazardous landfill in the South East of England (currently being prepared)
- Permanent Deposit of Inert Waste to Land in the South East of England (currently being prepared)

6.0 Cooperation Activities
6.1 Activities undertaken when addressing the strategic cross-boundary matter of waste management, whilst cooperating, are summarised as follows:
- Input to draft proposals for planning policy concerning waste management in each other’s area;
- membership of the South East Waste Planning Advisory Group and signatories to related joint MoU and joint position statements; and,
- ad-hoc exchange of information (via correspondence and meetings) related to the monitoring of waste movements and management capacity

7.0 Governance and Future Arrangements
7.1 The parties to this Statement have worked together in an ongoing and constructive manner. SCC, WSCC and the SDNPA will continue to cooperate and work together in a meaningful way and on an ongoing basis to ensure the effective strategic planning of waste management in their areas. Appropriate officers of each Party to this Statement will liaise formally through correspondence and meetings as and when required (including via SEWPAG).

7.2 The parties will review this SoCG at least every 12 months and establish whether this SoCG requires updating. Specific matters likely to prompt updates of this SoCG include the following:
- Modifications to the emerging Surrey Waste Local Plan resulting from its independent examination (anticipated in September 2019)
- The outcomes of the 5 year review of the West Sussex WLP
Evidence which shows significant changes in the level of waste movements between the authorities.
### Appendix 1 - Reported movements of waste between Surrey and West Sussex

#### Household, Commercial & Industrial Waste (Source: Environment Agency Waste Data Interrogator)

<table>
<thead>
<tr>
<th>Facility WPA</th>
<th>Facility Name</th>
<th>Operator</th>
<th>Exports from Surrey to West Sussex</th>
<th>Exports from West Sussex to Surrey</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surrey</td>
<td>West London AD Facility</td>
<td>Agrivert Limited</td>
<td>N/A  N/A</td>
<td>400  N/A</td>
</tr>
<tr>
<td>Surrey</td>
<td>Redhill Landfill (NEQ) EPR/BU8126iY</td>
<td>Biffa Waste Services Ltd</td>
<td>N/A  N/A</td>
<td>24,000</td>
</tr>
<tr>
<td>West Sussex</td>
<td>Charles Muddley Limited</td>
<td>Charles Muddley Limited</td>
<td>300  5,000  6,000</td>
<td>N/A  N/A</td>
</tr>
<tr>
<td>West Sussex</td>
<td>Crouchland Biogas Limited</td>
<td>Crouchland Biogas Limited</td>
<td>12,000  18,000  19,000</td>
<td>N/A  N/A</td>
</tr>
<tr>
<td>West Sussex</td>
<td>Pease Pottage Composting Site</td>
<td>KPS Recycling Limited</td>
<td>13,000  18,000  14,000</td>
<td>N/A  N/A</td>
</tr>
<tr>
<td>West Sussex</td>
<td>Walnut Tree Composting Facility</td>
<td>Langmead Farms Limited</td>
<td>14,000  15,000  16,000</td>
<td>N/A  N/A</td>
</tr>
<tr>
<td>West Sussex</td>
<td>Goddards Green W W T W</td>
<td>Southern Water Services Ltd</td>
<td>3,000  7,000  14,000</td>
<td>N/A  N/A</td>
</tr>
<tr>
<td>West Sussex</td>
<td>Sweeptech Recycling Park</td>
<td>Sweeptech Environmental Services Ltd</td>
<td>15,000  14,000  14,000</td>
<td>N/A  N/A</td>
</tr>
<tr>
<td>West Sussex</td>
<td>Tangmere Recycling Centre</td>
<td>Woodhorn Group Limited</td>
<td>18,000  18,000  18,000</td>
<td>N/A  N/A</td>
</tr>
</tbody>
</table>
## Inert Waste (Source: Environment Agency Waste Data Interrogator)

<table>
<thead>
<tr>
<th>Facility WPA</th>
<th>Facility Name</th>
<th>Operator</th>
<th>Exports from Surrey to West Sussex</th>
<th>Exports from West Sussex to Surrey</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surrey</td>
<td>Redhill Landfill (NEQ) EPR/BU8126IY</td>
<td>Biffa Waste Services Ltd</td>
<td>N/A</td>
<td>18,000</td>
</tr>
<tr>
<td>Surrey</td>
<td>Ellerton Yard</td>
<td>D J Grab Services Ltd</td>
<td>N/A</td>
<td>8,000</td>
</tr>
<tr>
<td>West Sussex</td>
<td>Lomond Equestrian Centre</td>
<td>P J Brown (Construction) Ltd</td>
<td>N/A</td>
<td>23,000</td>
</tr>
<tr>
<td>West Sussex</td>
<td>Land at Cranleigh Brick &amp; Tile Co Ltd</td>
<td>Rural Arisings Limited</td>
<td>N/A</td>
<td>4,000</td>
</tr>
<tr>
<td>West Sussex</td>
<td>Brookhurst Wood Landfill Site</td>
<td>Biffa Waste Services Ltd</td>
<td>11,000</td>
<td>N/A</td>
</tr>
<tr>
<td>West Sussex</td>
<td>United Yard</td>
<td>United Grab Hire Limited</td>
<td>9,000</td>
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</table>

## Hazardous Waste (Source: Environment Agency Waste Data Interrogator)

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<th>Facility WPA</th>
<th>Facility Name</th>
<th>Operator</th>
<th>Exports from Surrey to West Sussex</th>
<th>Exports from West Sussex to Surrey</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surrey</td>
<td>Camberley Treatment Plant</td>
<td>Viridor Waste (Thames) Ltd</td>
<td>N/A</td>
<td>500</td>
</tr>
<tr>
<td>West Sussex</td>
<td>Charles Muddle Limited</td>
<td>Charles Muddle Limited</td>
<td>1,000</td>
<td>N/A</td>
</tr>
<tr>
<td>West Sussex</td>
<td>HRUK Slinfold Site</td>
<td>Hensel Recycling (UK) Ltd</td>
<td>200</td>
<td>N/A</td>
</tr>
<tr>
<td>West Sussex</td>
<td>Medisort Limited</td>
<td>Medisort Limited</td>
<td>100</td>
<td>N/A</td>
</tr>
<tr>
<td>Facility WPA</td>
<td>Facility Name</td>
<td>Operator</td>
<td>Exports from Surrey to West Sussex</td>
<td>Exports from West Sussex to Surrey</td>
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<tr>
<td>--------------</td>
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<td>-----------------------------------</td>
</tr>
<tr>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td>1,000</td>
<td>2,400</td>
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<td></td>
<td></td>
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<td></td>
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