

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

### HIGHLIGHTED TEXT REQUIRES COMPLETION

#### 1.0 Introduction and parties involved

1.1 National policy<sup>1</sup> 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 policy<sup>2</sup> 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.”*

1.4 This document represents a **Statement of Common Ground between Surrey County Council (SCC) 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 each area.

1.5 SCC and 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 the following Local Plans:

- Surrey Waste Plan (adopted in 2008);
- East Sussex, Brighton & Hove and South Downs Waste and Minerals Local Plan (adopted in 2013);
- East Sussex, Brighton & Hove and South Downs Waste and Minerals Sites Plan (adopted in 2017), and;
- West Sussex Joint Waste Local Plan (adopted in 2014).

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<sup>1</sup> Paragraph 24 and 25 of the revised National Planning Policy Framework July 2018

<sup>2</sup> Paragraph 20 of the revised National Planning Policy Framework July 2018

SCC is currently updating its planning policies on waste management by preparing the Surrey Waste Local Plan (plan period to 2033) and SDNPA is undertaking a review of the East Sussex, Brighton & Hove and South Downs Waste and Minerals Local Plan, with a focus on the supply of minerals.

## 2.0 Signatories

2.1 This statement is agreed by:

Insert SDNPA name and position

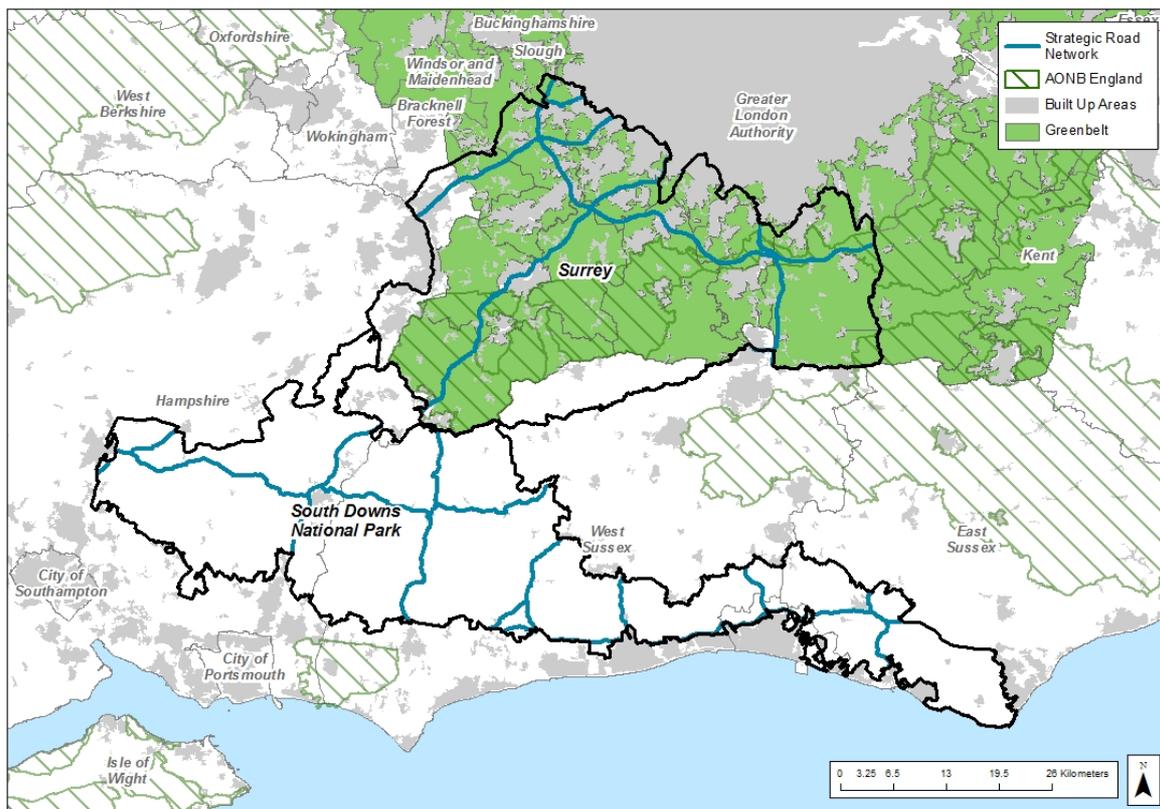
Councillor Mike Goodman, Cabinet Member for Environment and Transport, Surrey County Council

## 3.0 Strategic Geography

3.1 Surrey and the South Downs National Park are nearby areas in the south east of England (see Figure 1). There are good road connections, in particular the M25, M23 and A24 and A23. Waste management data shows that a proportion of waste produced in Surrey is managed in the National Park. 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. However it is known that waste from East Sussex and West Sussex is managed in Surrey and so it is quite possible that a proportion of waste of this waste was produced in the National Park. The movements for the years 2015, 2016 and 2017 are set out in Appendix 1. This cross boundary movement 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 and the National Park and other counties and areas.

Figure 1: Location of Surrey and the South Downs National Park



## 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 consistent with 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 Understanding<sup>3</sup> between SCC, SDNPA and other waste planning authorities in the South East which 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*

<sup>3</sup> Memorandum of Understanding between the Waste Planning Authorities of the South East of England, April 2017

*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 by SDNPA (together with East Sussex County Council and Brighton & Hove City Council) in the adopted East Sussex Brighton & Hove and South Downs Minerals and Waste Local Plan and also by SDNPA (together with West Sussex County Council) in the adopted West Sussex Waste Local Plan. The approach is also taken by SCC 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 and SDNPA 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 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 authorities (including the areas of West and East Sussex not situated in the National Park).

4.5 Appendix 1 details reported significant movements of waste from Surrey and to a waste management site in the National Park. Movements of waste from East and West Sussex to Surrey are also included, though, for the reasons set out above, it is not possible to be precise about how much waste produced in the National Park is exported to Surrey for management. Both authorities agree that there are no planning reasons why these movements cannot continue in future subject to completion of Patteson Court landfill considered in the section below.

4.6 Currently more non-hazardous waste is exported from Surrey than is imported and a capacity gap therefore exists for recovery of residual waste. Policies, including the allocation of land for the management of waste, are included in the Surrey Waste Local Plan to address this matter. The South Downs National Park Authority, is planning for net self-sufficiency in accordance with the Plans mentioned above. In light of this neither SCC or SDNPA are specifically planning to meet the waste management needs of the other area but neither are they 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 and this site has planning permission requiring restoration by 2030. There are no non-inert waste landfills in the National Park and non-inert waste requiring management by disposal to landfill is therefore exported, including to Surrey.

4.8 The demand for non-inert waste landfill has declined markedly in recent years and this decline 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 SWLP. Similarly no sites are allocated for landfill in the East Sussex Minerals and Waste Local Plan and Waste and Minerals Sites Plan. Policy W10 of the West Sussex Waste Local Plan allocates an extension to the Brookhurst Wood 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.

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 will 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 and East Sussex and other neighbouring areas. This assessment will also need to consider impacts associated with vehicle movements.

4.9 SCC and 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. 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 and fewer opportunities may exist for the management of waste which are clearly 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<sup>4</sup>.

Allocations of land are therefore proposed in the Surrey Waste Local Plan within the Green

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<sup>4</sup> See Surrey County Council Site Identification and Evaluation Report [January 2019]

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<sup>5</sup>. One such very special circumstance would be an inability of the waste to be practically managed in other locations outside of the Green Belt, including those outside of Surrey.

4.12 Proposals in the National Park for the management of waste that might otherwise need to be managed within the Green Belt in Surrey will be considered taking into account the national policy constraints on development within Green Belt. For example, where it is demonstrated that the waste to be managed is to be transported to the facility in the National Park then this may be a material consideration. However proposals for waste development in the National Park which are considered to be major development in the National Park can only be approved in exceptional circumstances.

## 5.0 Additional Strategic Matters

5.1 Common ground on other matters between SCC and 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 and 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 in the process of 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

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<sup>5</sup> This is consistent with paragraphs 143 and 144 of the NPPF  
*Statement of Common Ground Between Surrey County Council and South Downs National Park Authority  
Concerning Strategic Policies for Waste Management*  
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7.1 The parties to this Statement have worked together in an ongoing and constructive manner. SCC and 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. 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 Surrey Waste Local Plan resulting from its independent examination (anticipated in June/July 2019)
- Evidence which shows significant changes in the level of waste movements between the two authorities.

**Appendix 1 - Reported movements of waste between Surrey and the South Downs National Park (SDNP)**

Note that data is reported on a county basis and so the quantities of waste actually arising in the South Down National Park will be less than that shown in the tables below.

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

Facility WPA	Facility Name	Operator	Exports from Surrey to the SDNP (East Sussex)			Exports from SDNP (East Sussex) to Surrey		
			2015	2016	2017	2015	2016	2017
Surrey	Redhill Landfill (NEQ) EPR/BU8126IY	Biffa Waste Services	N/A	N/A	N/A	4,000	7,000	7,000
Surrey	Britanniacrest Recycling Ltd	Britanniacrest Recycling Ltd	N/A	N/A	N/A	14,000	15,000	21,000
SDNPA	Greystone Quarry	M D J Light Bros (S P) Ltd	8,000	8,000	9,000	N/A	N/A	N/A

Facility WPA	Facility Name	Operator	Exports from Surrey to SDNP (West Sussex)			Exports from SDNP (West Sussex) to Surrey		
			2015	2016	2017	2015	2016	2017
Surrey	West London AD Facility	Agrivert Limited	N/A	N/A	N/A	400	N/A	6,000
Surrey	Redhill Landfill (NEQ) EPR/BU8126IY	Biffa Waste Services Ltd	N/A	N/A	N/A	24,000	38,000	62,000

**Inert Waste (Source: Environment Agency Waste Data Interrogator)**

Facility WPA	Facility Name	Operator	Exports from Surrey to SDNP (West Sussex)			Exports from SDNP (West Sussex) to Surrey		
			2015	2016	2017	2015	2016	2017
Surrey	Redhill Landfill (NEQ) EPR/BU8126IY	Biffa Waste Services Ltd	N/A	N/A	N/A	18,000	36,000	22,000
Surrey	Ellerton Yard	D J Grab Services Ltd	N/A	N/A	N/A	N/A	8,000	11,000

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Surrey	Lomond Equestrian Centre	P J Brown (Construction) Ltd	N/A	N/A	N/A	N/A	N/A	23,000
Surrey	Land at Cranleigh Brick & Tile Co Ltd	Rural Arisings Limited	N/A	N/A	N/A	N/A	4,000	12,000

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

Facility WPA	Facility Name	Operator	Exports from Surrey to SDNP (East Sussex)			Exports from SDNP (East Sussex) to Surrey		
			2015	2016	2017	2015	2016	2017
SDNPA	Greystone Quarry, Lewes	M D J Light Bros (S P) Ltd	1,700	2,000	2,400	N/A	N/A	N/A

Facility WPA	Facility Name	Operator	Exports from Surrey to West Sussex			Exports from SDNP (West Sussex) to Surrey		
			2015	2016	2017	2015	2016	2017
Surrey	Camberley Treatment Plant	Viridor Waste (Thames) Ltd	N/A	N/A	N/A	500	700	700