



Your Ref: Dudley Local Plan

13 December 2023

TOWN AND COUNTRY PLANNING ACT 1990

Dudley Metropolitan Council – Regulation 18 Draft Local Plan

Thank you for consulting Surrey County Council (SCC), as Minerals and Waste Planning Authority (MWPA) for Surrey, about the Regulation 18 Draft Local Plan.

Waste management

Regarding waste management, the MWPA broadly supports details provided at chapter 17 of the Draft Dudley Local Plan (dated October 2023), including recognising future requirements for waste management and ensuring that a co-operative cross boundary approach to waste management is maintained. The MWPA also welcomes reference to the circular economy and waste hierarchy at paragraph 17.6 of the Draft Dudley Local Plan, which is in line with national policy as set out in the National Planning Policy for Waste 2014 (NPPW).

Regarding the strategic movement of waste between Surrey and Dudley, the South East Waste Planning Advisory Group (SEWPAG) set out thresholds for what is considered strategic movements of waste between differing plan-areas. The thresholds are as follows: 10,000 tonnes per annum (tpa) for inert waste, 5,000 tpa for non-hazardous waste, and 100 tpa of hazardous waste.

In this regard, the Waste Data Interrogator (WDI) 2022 indicates that in 2021 approximately 103 tonnes of waste arising in Dudley was received in Surrey. This comprised 20 tonnes of hazardous waste and 83 tonnes of non-hazardous waste. The WDI also indicates that in the same year 176 tonnes of waste arising in Surrey was received in Dudley, namely 168 tonnes of non-hazardous waste and 8 tonnes of hazardous waste.

In addition to this, the MWPA recently published a Waste Capacity Need Assessment (WCNA) for the county to the period 2042 which will form part of the evidence base supporting the preparation of the Minerals and Waste Local Plan for Surrey.

Part of the WCNA considers the nature of waste flows between Surrey and other plan-areas and found that for 2019, 2020 and 2021 no more than 111 tonnes of hazardous waste arising in Surrey per year was received by waste management facilities in Dudley. Moreover, less than 5,000 tonnes per annum of non-hazardous waste arising from Surrey has been received by waste management facilities in Dudley each year between 2019 and 2021.

Although the WDI data does not indicate that a strategically significant amount of waste generated in Surrey is received in the Dudley Metropolitan Council plan-area, the WCNA indicates that in 2020 this threshold was met for hazardous waste. This however decreased the following year.

Based on the information above, there is no obvious reason why Surrey cannot continue to receive relative volumes of waste from the Dudley plan-area for the foreseeable future.

Mineral resources

Regarding mineral resources, the MWPA welcomes details provided in the Dudley Draft Local Plan to provide sufficient minerals over the plan period and efforts to maintain the production of secondary and recycled aggregate, in line with national policy set out in the NPPW 2014 and National Planning Policy Framework 2023.

Further to this, the latest national Aggregates Monitoring Survey, published by the UK Government in 2019 identified no land-won sand and gravel or marine dredged aggregate movements between Surrey and any plan-area in the West Midlands, although this may change in the future.

I trust the above is self-explanatory and helpful. However, should you have any questions or require further information please do not hesitate to contact me.

Yours sincerely,