

East Sussex and Brighton & Hove  
Waste & Minerals Development Framework

**Information Paper 5**  
Residual Waste Disposal

October 2009

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**IP5**

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## Introduction

### Introduction

1.1 This 'Information Paper' on Residual Waste Disposal, is one in a series that has been produced to support the preparation of the Waste and Minerals Development Framework (WMDF). The WMDF will contain planning documents, such as the Core Strategy, that will help decide how and where waste should be dealt with and minerals produced in East Sussex and Brighton & Hove in the future (up to 2026). More information about them can be found on the Councils' websites:

- [www.eastsussex.gov.uk/environment/planning/development/mineralsandwaste](http://www.eastsussex.gov.uk/environment/planning/development/mineralsandwaste)
- [www.brighton-hove.gov.uk/index.cfm?request=b1148434](http://www.brighton-hove.gov.uk/index.cfm?request=b1148434)

1.2 The Information Papers are being used provide the evidence for the development of the WMDF and to support consultation and discussion with members of the public and key stakeholders who are concerned with waste and minerals in East Sussex and Brighton & Hove.

1.3 The Papers are 'living drafts' which present the evidence as it stands at this stage and they will be periodically updated with any new information that comes to light. This will ensure the Councils' knowledge and understanding of waste and minerals remains robust and the evidence base for the WMDF is 'sound'.

1.4 The Information Papers were first published and consulted upon in July 2007, and were then revised in February 2008. This third version (October 2009) brings them up to date with new information and recent changes in legislation and policy.

1.5 Details of the other Information Papers that have been produced are included in Appendix 1.

1.6 If you would like to comment on or add to the WMDF evidence base that is presented in this Information Paper, please visit the consultation website <http://consult.eastsussex.gov.uk> and follow the instructions for the Information Papers. Alternatively you can send an e-mail to [wasteandmineralsdf@eastsussex.gov.uk](mailto:wasteandmineralsdf@eastsussex.gov.uk) or write to:

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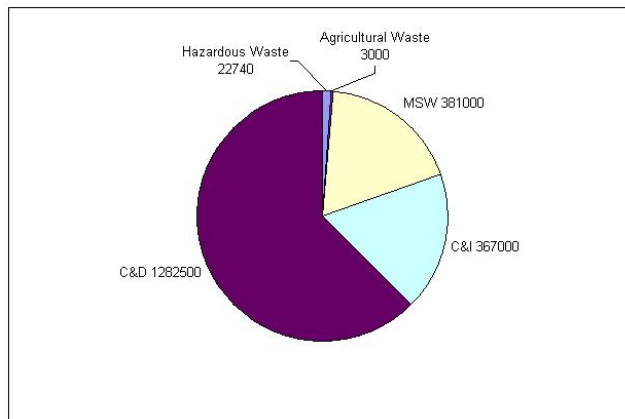
Please make sure that you refer to the section and paragraph numbers that your comments relate to.

## Residual Waste

2.1 This Information Paper is concerned with the disposal of waste in landfill and landraise sites. This is a topical issue since European, national and regional policy requires a shift away from land disposal of waste in favour of recycling, composting and energy recovery methods (see Appendix 2 for more information). However even if efforts to reduce, re-use, recycle, recover and treat waste are maximised, there will always be a quantity of waste left over that requires final disposal because some waste cannot be reused or recycled (e.g. broken furniture and mattresses) and because all waste management methods produce a residue that requires land disposal (e.g. ash from energy recovery facilities). The waste remaining that is disposed of to land is often referred to as 'residual waste'. Targets for diverting waste from landfill in the Waste Local Plan are recycling 40% of household waste and recovering 67% of municipal waste by 2015 <sup>(1)</sup>.

2.2 Over 2 million tonnes of waste are generated within East Sussex and Brighton & Hove per annum. The proportions of this total represented by different waste streams are presented in Figure 1.1<sup>(2)</sup>.

**Figure 1 Summary of Waste Arisings in East Sussex**



In 2007/08 57% of Municipal Solid Waste produced in East Sussex and Brighton & Hove was disposed of to land, a reduction from 68% in 2006/07<sup>(3)</sup>.

### What is Landraise?

2.3 Landraising involves the raising of existing land levels through the deposition of waste materials, usually on greenfield sites, and often in a natural depression in the land. It can be used to aid the restoration of already despoiled land.

1 See policy WLP1, East Sussex and Brighton & Hove Waste Local Plan, February 2006

2 For more detailed information regarding waste arisings see Information Paper 1

3 East Sussex Annual Monitoring Report- Minerals and Waste 2007/08

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### What is Landfill?

2.4 Landfilling involves the controlled infilling of an existing hole in the ground, often known as a 'void', which has usually been created by mineral extraction e.g. a quarry. Filling of the void represents restoration of the extraction site, often to the original land profile which existed prior to the mineral extraction. Landfill sites are commonly restored to a beneficial after-use. A good example is Beddington Landfill Site in the South Downs near Lewes. This site was a huge chalk quarry which has been filled with waste restoring the site to its original downland profile.

### Operation of Land Disposal Sites

2.5 Disposal of untreated non-inert waste to land has the potential to cause pollution as the waste decomposes and releases potentially harmful substances. Most notable amongst these are methane, a powerful greenhouse gas that is generated during the decomposition of biodegradable waste, and leachate, the potentially polluting liquid produced by rainwater permeating through biodegradable waste. The EU Landfill Directive attempts to reduce these impacts by controlling land disposal operations e.g. by restricting the amount of biodegradable waste that can be disposed of to land (see Box 1) <sup>(4)</sup>.

2.6 Current standard land disposal practice in the UK involves waste being compacted and tipped into prepared areas within a site known as 'cells'. Non-inert waste decomposes in anaerobic conditions (i.e. in the absence of air within the waste mass) as bacteria break down the waste to produce gas and soluble chemicals. The soluble chemicals combine with liquids in the waste such as rainwater to form leachate which drains to the base of the site. Modern landfills are lined to prevent leachate leaving the base of the site and entering the underlying rock strata which could cause pollution of any groundwater. Gases are also produced under these conditions, most notably methane, a flammable gas and a greenhouse gas, which is more damaging in this respect than carbon dioxide <sup>(5)</sup>. Both leachate and gas production are very carefully monitored and controlled.

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4 Although termed the 'Landfill Directive', it should be noted that this directive makes no distinction between landfill and landraise and its provisions apply to both activities

5 Methane from landfill contributes 3% of UK total greenhouse gas emissions (Waste Strategy 2007)

**Box 1****Summary of the EU Landfill Directive**

The Landfill Directive's overall aim is "to prevent or reduce as far as possible negative effects on the environment, in particular the pollution of surface water, groundwater, soil and air, and on the global environment, including the greenhouse effect, as well as any resulting risk to human health, from the landfilling of waste, during the whole lifecycle of the landfill".

The Directive has provisions covering location of landfills, and technical and engineering requirements for aspects such as water control and leachate management, protection of soil and water and methane emissions control.

The Directive also sets demanding targets to reduce the amount of biodegradable municipal waste landfilled. These targets are:

- By 2010 to reduce biodegradable municipal waste landfilled to 75% of that produced in 1995
- By 2013 to reduce biodegradable municipal waste landfilled to 50% of that produced in 1995
- By 2020 to reduce biodegradable municipal waste landfilled to 35% of that produced in 1995.

The Landfill Directive bans the landfilling of:

- all liquid wastes;
- hazardous waste which in landfill conditions is explosive, corrosive, oxidising, highly flammable or flammable;
- other hospital and other clinical wastes which are infectious;
- chemical substances arising from research and development projects whose effects on man and/or the environment are unknown;
- whole used tyres by April 2003 and shredded used tyres by April 2006 (this does not include tyres used as engineering material or bicycle tyres).

2.7 Before tipping commences, landfill sites are lined with impermeable clay and/or synthetic liners and systems are installed to drain leachate and collect methane in a controlled manner. The methane gas collected can be burned as a fuel that can be used locally for heat or power, or to produce electricity for distribution through the National Grid. The use of the gas in this way brings benefits as it acts as an alternative energy source to fossil fuels<sup>(6)</sup>.

6 For more information see 'Information Paper 9- Climate Change and Waste and Minerals'

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### Landraise - Additional Matters

2.8 Landraise takes place where waste is deposited above the original ground level. In some cases, some excavation may take place to prepare the site before waste is deposited. Final contours of landraise sites may be a sensitive issue, since the restored landform stands proud of the surrounding topography.

2.9 To minimise the impacts sites should be appropriate in the context of the surrounding landscape, with slope gradients which harmonise with local landforms or other features. In urban areas, the landform may not need to conform to the surrounding topography, but should enhance the area and not look incongruous. In undulating or hilly landscapes, steeper slopes may be formed which can look natural.

2.10 The new landform may have more than one summit, or a ridge landform, for a more natural appearance, but careful consideration of drainage patterns from such landforms needs to be considered to avoid water ponding on the cap surface. Capping of landraise sites with low permeability soil can considerably increase run-off rates, although this may result in a consequent increase in flood risk elsewhere which must be managed.

### Inert Landfill

2.11 Inert waste <sup>(7)</sup>, the majority of which derived from Construction & Demolition activities, does not break down to produce potentially harmful substances and so, when landfilled, produces insignificant levels of pollution. Inert landfill sites are largely unaffected by potential problems associated with non-inert landfill sites such as vermin, odour and windblown litter. Inert waste disposal sites can range from a large landfill to smaller scale operations used to level or raise land as part of other building works. The potential environmental impacts of inert operations are therefore lower than non-inert landfill, although there may be similar issues resulting from the delivery and deposit of materials on site which involves large vehicles and plant.

### Locational Constraints and Opportunities

2.12 There are a range of locational constraints and opportunities that need to be considered when determining whether sites are suitable for landfilling or landraising. The Inspector's Report of the East Sussex and Brighton & Hove Waste Local Plan identified a range of constraints and opportunities, as summarised in Box 2.

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7 The Landfill Directive defines inert waste as that which does not undergo any significant physical, chemical or biological transformations

**Box 2****Summary of Waste Local Plan Inspector's Findings Regarding Landfill and Landraise (published June 2004)**

When considering the issue of land disposal in East Sussex and Brighton & Hove in 2003, the Inspector found that:

- there is a shortage of landfill capacity in the area, and that new landfill/landraise sites in appropriate locations will need to be sought;
- it is unlikely that there is further requirement for landraise sites for inert waste;
- waste disposal by landraising should only be considered where there are no opportunities for landfill in the area;
- it may not always be possible to find sites that are acceptable on local amenity, access and pollution grounds;
- landraising is not more harmful than landfill, and that landraise sites can enhance the surrounding area;
- the objective should not necessarily be to enhance the environment, but rather, not to harm the environment;
- areas of search for landfill/landraise should exclude AONBs in the first instance, but that failing the identification of suitable sites, it may be necessary to consider sites within AONBs;
- floodplains be avoided, and instead remain as areas to cater for floodwater.

2.13 Environment Agency policy on the location of landfill sites is set out in their policy note 'RGN3' <sup>(8)</sup>. This states that the Environment Agency will object to any proposed landfill site in 'Groundwater Protection Zone 1' and for all other proposed landfill site locations, a risk assessment must be conducted based on the nature and quantity of waste, and the natural setting and properties of the location. Where this risk assessment demonstrates that active long-term site management is essential to prevent long-term groundwater pollution then the Agency will object to the proposal.

2.14 The EU Landfill Directive also outlines issues and considerations for landfill/landraise sites. These are summarised in Table 1.1 below. Opportunities are also outlined in this table for both landfill and landraise.

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8 Environment Agency Regulatory Guidance Note 3 (Version 4.0, December 2002) Groundwater Protection: Locational Aspects of Landfills in Planning Consultation Responses & Permitting Decisions

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**Table 1.1 Summary of Landfill and Landraise Considerations and Opportunities**

Issue	Considerations	Opportunity
1. Consideration of local and regional environmental characteristics.	<p>Proximity to urban/residential and recreation areas - especially sensitive receptors such as hospitals and schools; waterways &amp; surface water bodies; coastal water; nature protection zones; cultural heritage sites; agricultural sites; and transportation links.</p> <p>Site conditions should consider: groundwater; geological conditions; hydrogeological conditions; flood &amp; subsidence zones and areas vulnerable to landslide.</p>	Areas away from main population centres and unspoiled landscape; expansion of existing landfills; areas that were formerly mineral workings; areas with good transportation links including ports; areas with low groundwater table or poor groundwater quality; and areas not in floodplains.
2. Water control and leachate management	Considerations to include: precipitation; surface water; groundwater; contaminated water collection and treatment; and leachate management	Areas with low ground water and not within close proximity to surface water; areas where there are not unusually high levels of precipitation and areas where leachate can be managed.
3. Protection of soil and water	Considerations include: soil; groundwater; and surface water	Areas with low agricultural quality; poor groundwater quality and away from surface water courses.
4. Nuisances and hazards	Considerations include: odours and dust; wind-blown materials; noise; traffic; birds, vermin & insects; formation of aerosols; fires; and mud & debris on the highway	<p>Compatible land uses that help lessen the occurrence of nuisances and hazards include:</p> <ul style="list-style-type: none"> <li>• active mineral working sites;</li> <li>• previous or existing industrial sites;</li> <li>• contaminated or derelict land;</li> <li>• land on or adjoining sewage treatment works; or</li> <li>• redundant farm buildings and their curtilage.</li> </ul>

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Issue	Considerations	Opportunity
5. Land Stability	This should take account of landfilled material and associated structures	Areas that are stable and not prone to settlement or slippage.

2.15 It should be noted that the financial investment required to develop a landfill or landraise site is so great that it is generally only economic for companies to develop fairly large sites.

### Land Disposal Requirements in East Sussex and Brighton & Hove

2.16 As discussed in Information Paper 1, East Sussex and Brighton & Hove will need to find additional capacity for disposal of waste to land (Table 1.2). Information Paper 1 predicts that over 5,000,000 tonnes of capacity would be required for non-hazardous landfill by 2026/27.

**Table 1.2 Total Demand for Non-Hazardous and Inert Landfill Capacity (000's tpa)**

	Non-hazardous landfill (cumulative requirements)		Inert landfill (cumulative requirements)		Hazardous landfill (cumulative requirements from 2008/09)	
	Min	Max	Min	Max	Min	Max
2011/12	960	1,024	881	904	12	17
2016/17	3,000	3,100	1,857	1,932	30	40
2021/22	3,900	4,100	2,669	2,813	43	67
2026/27	4,800	5,100	3,362	3,586	53	96

### Land Disposal Sites in East Sussex and Brighton & Hove

#### Non-Inert Waste

2.17 There is very little remaining capacity for the land disposal of non-inert waste in East Sussex and Brighton & Hove. Beddingham landfill site near Lewes closed in May 2009, leaving the site at Pebsham, north of the A259 between Bexhill and Hastings, as the only remaining facility. Pebsham is also expected to reach capacity in 2009, however the operator has applied for a variation to the current permission in order to extend non-inert landfill operations to the northern part of the site, which was previously reserved for inert waste. This has been approved subject to a legal agreement and is expected to provide an additional 489,000 cubic metres of capacity (122,270 tonnes per annum over 4 years).

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2.18 The Waste Local Plan identifies Ashdown Brickworks to the north of Bexhill as a potential new landfill site. This site is an existing active brickworks using clay from two pits on the site. Any scheme for landfill at this site would have to consider the ongoing requirements for clay, which is extracted to supply the site's brickworks. In addition the current Waste Local Plan envisages extensive improvements to the road access would be required before use of the site as a landfill would be acceptable.

2.19 These issues were reflected in the Waste Local Plan Inspector's Report, which stated that the site could have become operational in 2008/09 if access constraints were overcome. The intention is that traffic problems of the A259 would be addressed by building the Bexhill-Hastings Link Road. An option for improving access to the site would involve construction of a new road linking the site to the Link Road at the A269 near the existing Freezeland Lane junction.

2.20 There are very few other unrestored former mineral workings in the area, and, in any event, landfilling such workings may not always be appropriate due to ecological and geological considerations. Some, particularly downland chalk pits, are situated on major aquifers where infilling with non-inert waste would present an unacceptable risk of polluting water resources. Other former mineral workings are in remote rural locations with substandard road access which would be inadequate for landfill operations.

2.21 Identifying potential landraise sites is also problematic. Approximately two thirds of East Sussex and Brighton & Hove is covered by the High Weald Area of Outstanding Natural Beauty and proposed South Downs National Park and much of the rest of the area is attractive countryside with many sensitive landscapes and historical features <sup>(9)</sup>.

2.22 A separate technical study is being prepared which is intended to identify potential areas for future land disposal operations.

### Inert Waste

2.23 There are no large dedicated facilities for the land disposal of inert residual waste within East Sussex and Brighton & Hove. Much of this type of waste is either received at the existing disposal site at Pebsham or is taken to 'exempt' sites where the waste is used in agricultural land improvement or landscaping. Approximately 40% is taken to general land disposal sites outside of the area, including exempt sites. Future arisings of inert waste and the amounts requiring disposal are dependent largely on the amount of construction activity taking place. Increasing landfill tax charges and the aggregates levy are economic drivers intended to increase recycling of this material.

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9 See Information Paper 6 for further information on the environment of East Sussex and Brighton & Hove

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2.24 There are several sites throughout the Plan area that have planning permission to accept clean inert waste as part of improvements to a site, e.g. for agricultural or recreational purposes. These sites can be exempt from waste management licensing and, at present, are not included in the Environment Agency figures for disposals. At the end of August 2001, the capacity of outstanding unimplemented planning permissions in East Sussex and Brighton & Hove totalled around 260,000 cubic metres (0.26 mcm). It is likely that a significant proportion of inert waste from the area is exported to exempt sites in West Sussex.

## Appendices

### Appendices

#### Appendix 1- List of other Information Papers Prepared

1. The Future Need for Waste Management
2. The Future Need for Minerals Production and Management
3. Sustainable Resource Use and Management
4. Waste Management Methods and Technologies
5. Residual Waste Disposal
6. Spatial Portrait of East Sussex and Brighton & Hove
7. Hazardous Waste
8. Transportation of Waste and Minerals
9. Climate Change and Waste and Minerals
10. Waste Water and Sewage Sludge Treatment

#### Appendix 2- Legislation and Policy Review of Residual Waste Management

##### **Introduction**

This policy review looks at national and regional legislation and policy as it relates to residual waste management and deposition to land.

Included in this review, are the:

- Waste Strategy for England 2007;
- Planning Policy Statement 10 (PPS 10);
- Planning Policy Statement 25 (PPS 25);
- South East Plan.
- East Sussex and Brighton & Hove Waste Local Plan
- Municipal Waste Management Strategies for East Sussex and Brighton & Hove.

##### **Waste Strategy for England 2007**

This strategy recognises that reliance on landfill is already reducing, and that landfill should continue to be regarded as the last resort for waste management. The government will continue to pursue the reduction of landfilling, while recognising that it is necessary for the disposal of some wastes such as some hazardous waste streams, and also as a means of restoring exhausted minerals workings.

The Government intends to set a new national target for the reduction of commercial and industrial waste sent to landfill. On the basis of the policies set out in *Waste Strategy for England 2007*, national levels of commercial and industrial waste landfilled are expected to fall by 20% by 2010 compared with 2004 rates.

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The Government also considered, in conjunction with the construction industry, a target to halve the amount of construction, demolition and excavation wastes going to landfill by 2012 through waste reduction, re-use and recycling. This target has since been included in the 'Strategy for Sustainable Construction'<sup>(10)</sup>.

The targets contained within Waste Strategy 2007 are set out in Box A1.

### Box A1

#### Key Targets of Waste Strategy for England 2007

Key Targets of the strategy are to:

- decouple waste growth (in all sectors) from economic growth and put more emphasis on waste prevention and re-use;
- meet and exceed the Landfill Directive diversion targets for biodegradable municipal waste in 2010, 2013 and 2020;
- increase diversion from landfill of non-municipal waste and secure better integration of treatment for municipal and non-municipal waste;
- secure the investment in infrastructure needed to divert waste from landfill and for the management of hazardous waste;
- get the most environmental benefit from that investment, through increased recycling of resources and recovery of energy from residual waste using a mix of technologies.

One of the aims of the strategy is to create incentives that reflect the waste hierarchy and create opportunities for the reduction, re-use, and recycling of waste, and recovery of energy from waste. The Government is therefore:

- increasing the landfill tax escalator so that the standard rate of tax will increase by £8 per year from 2008 until at least 2010/2011 to give greater financial incentives to businesses to reduce, re-use and recycle waste (from £24 in 2007 to £48 in 2010);
- considering removing the ban on local authorities introducing household financial incentives for waste reduction and recycling, through early legislative change - removing the ban would bring England in line with most other European countries and could reduce the amount of annual residual waste landfilled by up to 15% – equivalent to 1.5 million tonnes or 130kg per household; and
- intending, subject to further analysis, to consult on whether the introduction of further restrictions on the landfilling of biodegradable wastes or recyclable materials would make an effective contribution to meeting the objectives set out in the strategy, to reduce greenhouse gas emissions and increase resource efficiency.

10 BERR (2008) 'Strategy for Sustainable Construction' available at <http://www.berr.gov.uk/files/file46535.pdf>

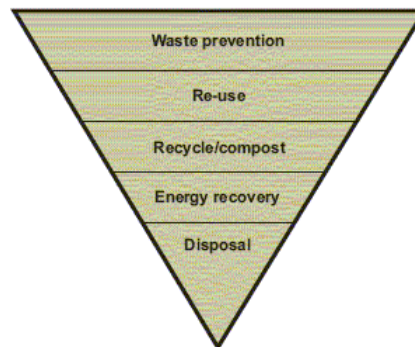
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The strategy set ambitious targets to bring England in line with other European countries that are achieving significantly higher recycling rates.

### **PPS10 : Planning for Sustainable Waste Management**

PPS10 identifies the overall objective of Government policy on waste to be the protection of human health and the environment through waste reduction and sustainable waste management. This involves moving the management of waste up the 'waste hierarchy (see Figure A1.1), with disposal to land being the least preferred method of waste management.

**Figure A1.1 The Waste Hierarchy**



**Source:** Waste Strategy for England, 2007

In considering potential sites for new waste management facilities, including landfill sites, Waste Planning Authorities must test them against the criteria set out in paragraph 20 and consider factors such as those listed in Annex E of PPS10, such as land stability; visual intrusion; nature conservation; and protection of water resources.

### **PPS 25: Development and Flood Risk**

PPS 25 provides a risk based 'Sequential Test' in order to steer development to areas with lower risk of flooding. It identifies landfill as being 'more vulnerable' to flooding and meaning landfill developments should not be permitted in Flood Zones 3a and 3b, and must be subject to an 'exception test' if proposals are made to locate them in Zone 2 <sup>(11)</sup>.

### **The Landfill (England and Wales) Regulations 2002<sup>(12)</sup>**

These regulations place a responsibility on planning authorities when considering planning applications for landfill sites to consider a number of specific locational criteria. These are set out in Schedule 2, paragraph 1(1), which states:

11 see PPS25, Annex D, Paragraph D9

12 Available at [www.opsi.gov.uk/si/si2002/20021559.htm](http://www.opsi.gov.uk/si/si2002/20021559.htm)

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"The location of a landfill must take into consideration requirements relating to: the distances from the boundary of the site to residential and recreational areas, waterways, water bodies and other agricultural or urban sites; the existence of groundwater, coastal water or nature protection zones in the area; the geological or hydro geological conditions in the area; the risk of flooding, subsidence, landslides or avalanches on the site; and the protection of the natural or cultural heritage in the area."

### **Landfill Allowance Trading Scheme (LATS)**

This scheme aims to assist the UK meet targets contained within the Landfill Directive for the reduction of biodegradable municipal waste going to landfill. It provides each Waste Disposal Authority with a limit on the quantity of municipal waste it can landfill in a particular twelve month period through the allocation of allowances. Each waste disposal authority can determine how to use its allowances in the most effective way. It will be able to trade allowances with other authorities, save them for future years (bank) or use some of its future allowances in advance. The role of Waste Planning Authorities is to work with the Waste Collection Authorities to ensure that sufficient waste management infrastructure is provided to ensure the most cost-effective landfill diversion strategy for the area. More information on LATS is available at <http://www.defra.gov.uk/environment/waste/localauth/lats/intro.htm>

### **South East Plan**

The adopted South East Plan was published in May 2009 and replaces the previous regional policy document Regional Planning Guidance for the South East 9: Waste and Minerals (RPG9). It provides a number of policies related to land disposal whose effects on East Sussex and Brighton & Hove are summarised below.

- **Policy W3: Regional Self Sufficiency:** Waste authorities and waste management companies are to provide management capacity equivalent to the amount of waste arisings requiring management within the region's boundaries, plus a declining amount of waste from London. Provision for London's exports will usually be limited to landfill, in line with the Landfill Directive targets and, by 2016, new permissions will only provide for residues of waste that have been subject to recycling or other recovery process. As part of the South East Region, the Councils will need to provide landfill capacity for their apportionment of London's exported waste. This apportionment for East Sussex and Brighton & Hove is 1.06 million tonnes for the period 2006 - 2015, reducing to 0.59 million tonnes for 2016-2025.
- **Policy W4: Sub-Regional Self-Sufficiency:** The Councils are to plan for net self-sufficiency. This will be through the provision of waste management capacity equivalent to the amount of waste arising and requiring management within their boundaries. Where appropriate and consistent with Policy W3, capacity should also be provided for waste from London (i.e. landfill); and waste from adjoining sub-regions (waste planning authority area within or the adjoining the region).
- **Policy W5: Targets for Diversion from Landfill:** This policy sets targets for diversion from landfill for the region(see Table A1.1). ESCC and BHCC must

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ensure that policies are in place to contribute to the delivery of these targets, as well as providing sufficient landfill capacity to process residues and waste that cannot practicably be recovered.

**Table A1.1 Landfill Diversion Targets for the South East**

Year	MSW (mt/yr)	C&I (mt/yr)	C&D (mt/yr)	All waste (mt/yr)
2008	2.0	5.2	10.0	17.2 (68%)
2010	2.5	5.8	10.1	18.4 (71%)
2015	3.9	7.4	10.4	21.7 (79%)
2020	4.7	8.7	10.7	24.0 (84%)
2025	5.1	9.4	10.9	25.5 (86%)

- Policy W13: Landfill Requirements This policy states that waste development documents should provide for continuing but declining landfill capacity. Non-inert landfill capacity should be husbanded to provide for disposal of residual non-inert waste.

### **East Sussex and Brighton & Hove Waste Local Plan (WLP)**

Relevant objectives of the Plan are to:

- reduce the amount of waste disposed of to land (Objective a); and
- increase recycling and recovery and achieving targets (Objective c).

The WLP also addresses the Landfill Directive. The quantities of biodegradable municipal waste that East Sussex and Brighton & Hove are allowed to landfill by the Waste and Emissions Trading (WET) Act 2003 are set out below.

**Table A1.2 European Landfill Directive Requirements (applicable to UK)**

Year	EU Landfill Directive Requirements	Limits to landfill of biodegradable municipal waste
2010	Reduce biodegradable municipal waste to 75% of 1995 levels.	146,996
2013	Reduce biodegradable municipal waste to 50% of 1995 levels.	97,910
2020	Reduce biodegradable municipal waste to 35% of 1995 levels.	68,510

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The Strategy recognises that East Sussex is running out of available landfill space, and therefore other waste treatment/disposal methods need to be considered. In addition the Strategy observes that the majority of waste is still landfilled in the County, and this must change to meet European and national targets.

The strategy recognises that waste has to be managed in an appropriate way, by:

- reducing the amount of waste sent to landfill; and
- aiming to recover value from 45% of waste (recycling and energy recovery together) by 2008/09, 50% by 2010 and 67% by 2015.

The authorities aim to reduce the amount of biodegradable waste landfilled as far as possible, and to buy LATS allowances only where considered the most appropriate course of action<sup>(13)</sup>. Key targets are to reduce the amount of biodegradable waste sent to landfill to:

- 102,000 tonnes by 2009/10;
- 68,000 tonnes by 2012/13;
- 47,500 tonnes by 2019/20.

*Policy 14* of the JMWMS states that:

“The councils will seek to reduce the reliance on landfill whilst acknowledging that landfilling will be required for the disposal of residual waste from waste treatment processes and for direct disposal of waste in some cases.”

### **Brighton & Hove City Council Municipal Waste Management Strategy**

Brighton & Hove City Council is in the process of developing a municipal waste management strategy which will set out how the council intends to manage its waste into the future. The city council currently has no statutory duty to produce a strategy, however, it intends to provide a framework to support the change that needs to be made so that waste is managed more sustainably.

The city of Brighton & Hove is currently recycling and composting almost 30% of all household waste generated. There is still a significant amount of waste that is being sent to landfill, thus improving performance and meeting government targets, particularly relating to the landfilling of waste, will be a focus of the strategy.

The strategy will take account of the long-term contract for waste management, being developed with East Sussex County Council. The county will develop waste growth scenarios that will assist with predicting future waste management needs. This process will be conducted with appropriate levels of community engagement. A sustainability appraisal will be developed concurrently.

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