

Wandsworth Local Plan Review: Duty to Co-operate Report on Waste Exports

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1. Purpose of the report

- 1.1 This report provides an audit and analysis of the issues raised during the duty to co-operate engagement on waste exports January – March 2021 which formed part of Wandsworth’s draft Local Plan Regulation 18 consultation.
- 1.2 The duty to co-operate (DtC) requires Wandsworth “to engage, constructively, actively and on an on-going basis” with prescribed public bodies in the preparation of development plan documents “so far as relating to a strategic matter”. The National Planning Policy Framework (NPPF) includes infrastructure for waste management as one of the strategic policy areas.
- 1.3 The National Planning Practice Guidance (NPPG) notes that “Waste is a strategic issue which can be addressed effectively through close co-operation between waste planning authorities and other local planning authorities and public bodies to ensure a suitable and sustainable network of waste management facilities is in place” (Para 15).
- 1.4 Planning Practice Guidance for Waste goes on to say that “Given the unique waste needs of London, there is likely to be a need for waste planning authorities surrounding London to take some of London’s waste. The Mayor and waste planning authorities in London should engage constructively, actively and on an ongoing basis with other authorities, under the duty to cooperate, to help manage London’s waste” (Para 44).
- 1.5 Wandsworth’s draft Local Plan will plan for net self-sufficiency for LACW, C&I and C&D waste streams by safeguarding existing waste sites and identifying sufficient land to provide opportunities to meet the waste management capacity gaps for the borough. Net self-sufficiency means providing enough waste management capacity to manage the equivalent of 100% of these waste streams generated in Wandsworth, while recognising that some imports and exports will continue. Wandsworth’s Local Plan will also plan for a target of 95% beneficial use of excavation waste, in line with the London Plan.
- 1.6 Notwithstanding Wandsworth’s plan to manage its own waste, there will still be some waste that cannot be managed within the borough because there is not a full range of suitable facilities. Wandsworth has identified sixteen waste planning authorities (or groups of waste planning authorities) who receive of ‘strategic’ amounts of waste exports from the Borough. A ‘strategic’ amount of waste is that over certain thresholds which have been agreed by waste planning authorities across the wider south east. Wandsworth has engaged with each of these authorities, or groups of authorities, to establish if there are any planning reasons why similar waste exports from the Borough cannot continue over the plan period.
- 1.7 The report also sets out the context of this continuing dialogue by making recommendations and identifying the next stages.

- 1.8 Waste is listed as a strategic matter in the National Planning Policy Framework (NPPF) and is therefore subject to the duty to co-operate.
- 1.9 The information contained in this report represents a moment in time during ongoing co-operation with other waste planning authorities as part of the development of the Wandsworth's draft Local Plan.

2 Picture of waste exports

- 2.1 In order to have meaningful discussions with waste planning authorities (WPAs) about waste movements, it is important to understand what and how much waste is sent where. Using the Environment Agency's Waste Data Interrogator (WDI) and Hazardous Waste Data Interrogator (HWDI) it is possible to build a picture of what types of waste are exported from Wandsworth, where this waste is sent and which sites receive the waste.
- 2.2 It should be noted that not all waste arising in Wandsworth is traceable to its end destination through the WDI, in particular business waste, and it is therefore not possible to say exactly how much of Wandsworth's waste is managed where. This is because the WDI does not always include an origin or destination at planning authority level, but contains origins such as "Central London" and "South London" which may or may not include waste from Wandsworth. However, it is possible to use the WDI data as a proxy to indicate what the proportions are for monitoring purposes. To avoid a distorted picture from anomalous years, data was collated and is shown for a five year period 2015-2019.
- 2.3 Waste arisings and exports vary from year to year. In 2018 Wandsworth exported just over 330,000 tonnes of waste to around 25 main waste planning authorities (WPA) areas, and in 2019 exports from Wandsworth amounted to 630,000 tonnes. The difference between these two years is the amount of excavation waste arising in the Borough.

Table 2.1: Exports from Wandsworth by waste type 2015-2019 (all waste streams)

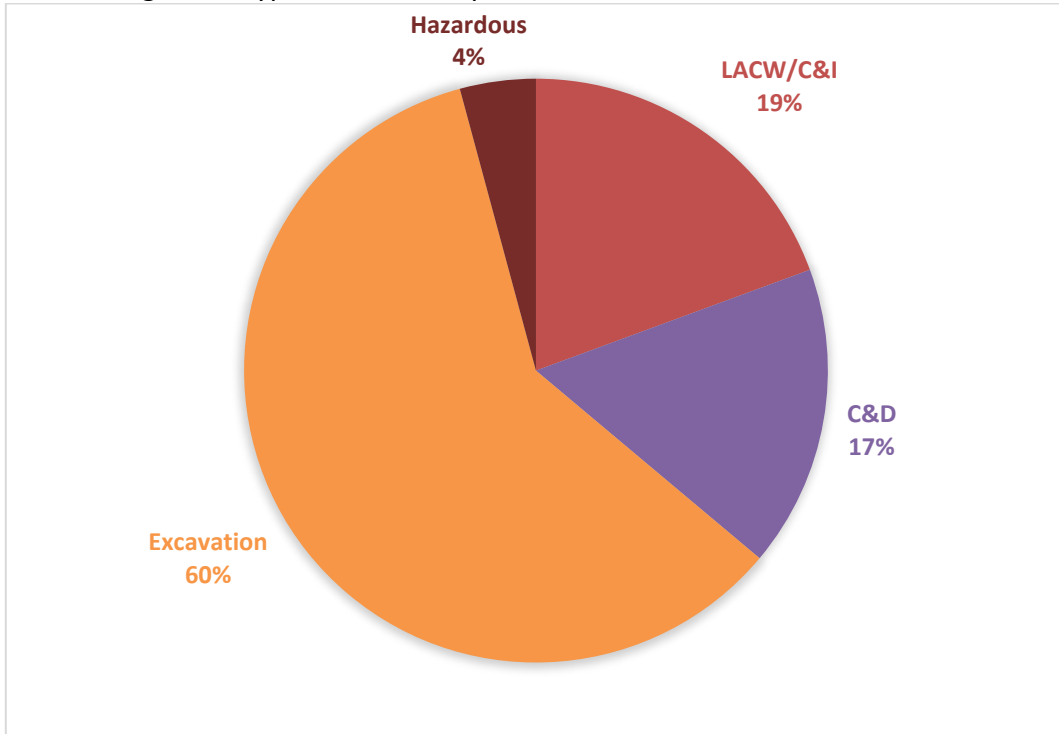
Waste type	2015	2016	2017	2018	2019
LACW/C&I	96,633	92,774	90,328	90,374	96,585
C&D	45,324	76,201	71,832	86,887	122,330
Excavation	271,048	400,823	220,753	139,587	404,618
Hazardous	13,674	27,981	34,851	15,260	9,362
Total exports	426,679	597,779	417,764	332,108	632,895

Source: Hazardous Waste Data Interrogator and Waste Data Interrogator 2015-2019, statistical data set ENV18 - Local authority collected waste: annual results tables

- 2.4 Figure 1 shows that nearly two-thirds (60%) of waste exported from Wandsworth 2015-2019 was excavation waste. The remainder is divided between LACW/C&I (195) and C&D waste streams and just under half was in the local authority collected waste

(LACW) and commercial and industrial (C&I) category. A small amount of hazardous waste was also exported.

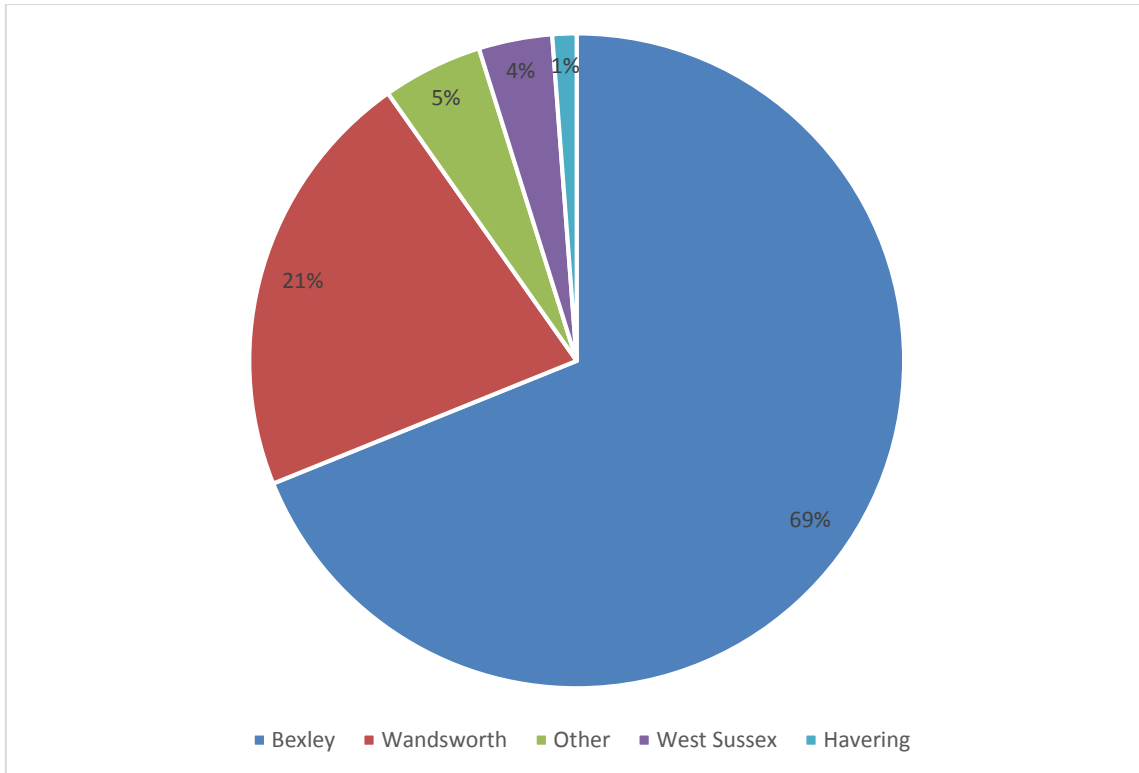
Figure 1: Types of waste exported from Wandsworth 2015-2019



Source: Waste Data Interrogator and Hazardous Waste Data Interrogator 2013-2017

2.5 Figure 2 shows that just over a fifth of recorded LACW/C&I waste arising during 2015-2019 was managed in Wandsworth while the majority of exports went to Bexley.

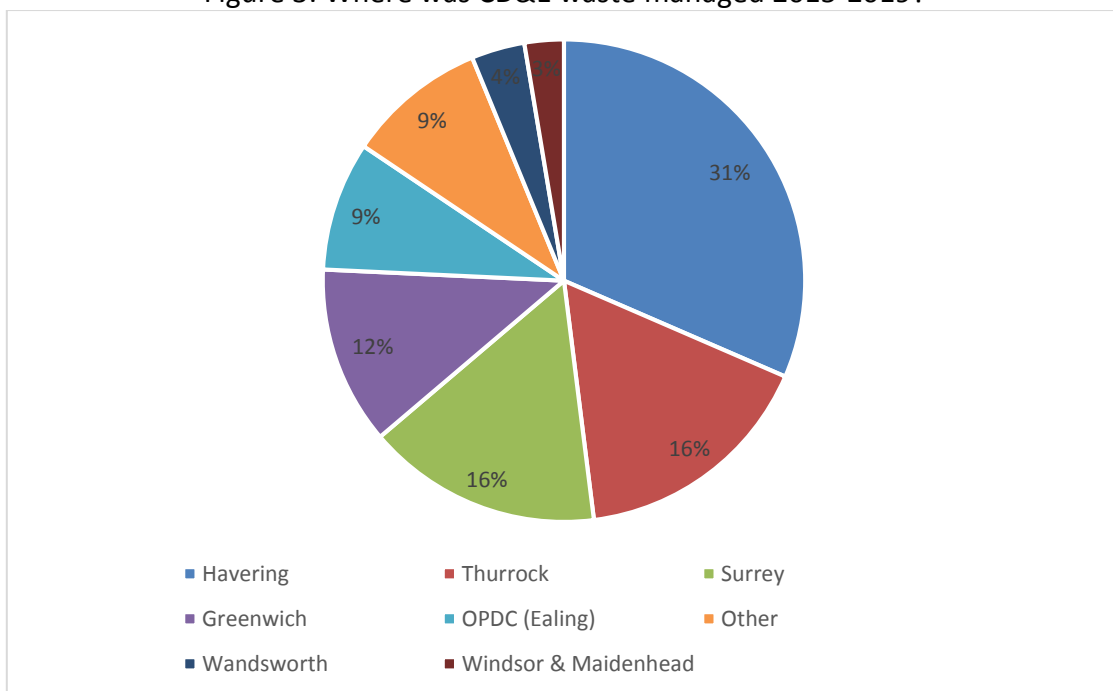
Figure 2: Where was LACW/C&I managed 2015-2019?



Source: Waste Data Interrogator 2013-2017

2.6 Figure 3 shows that 96% of all CD&E waste arisings 2015-2019 were exported. The majority of exports went to Havering, Thurrock, Surrey, Greenwich and OPDC (Ealing).

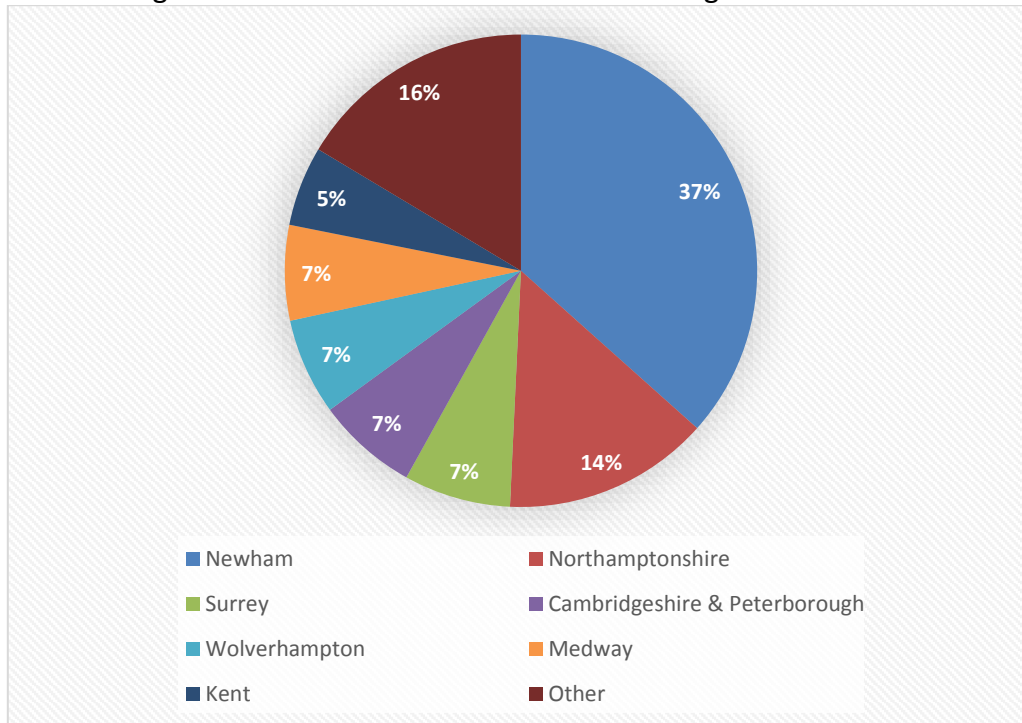
Figure 3: Where was CD&E waste managed 2015-2019?



Source: Waste Data Interrogator 2013-2017

2.7 Almost all hazardous waste arising in Wandsworth was exported 2015-2019. The largest amounts were exported to Newham (37%) and Northamptonshire (14%) with smaller amounts exported to other areas.

Figure 4: Where was hazardous waste managed 2015-2019?



Source: Hazardous Waste Data Interrogator 2013-2017

3 Audit of engagement with waste planning authorities

3.1 In January 2021, Wandsworth wrote to 26 waste planning authorities who receive ‘strategic’ amounts of waste exports originating in the Borough. A template of the letter can be found at Appendix A.

3.2 ‘Strategic’ movements are generally understood to be of a size and nature that alternative provision for that waste would need to be planned for if exports were not able to continue. What constitutes a ‘strategic’ level of waste movement will vary between waste planning authorities, however the guideline levels set out below have been agreed in London, south east and east of England as a starting point for considering whether dialogue is required. These levels are for the total quantum of movement to an area rather than to a single site.

- Non-hazardous waste – more than **5,000 tonnes** per annum
- Hazardous waste - more than **100t** per annum
- Inert waste - more than **10,000t** inert per annum

3.3 The letter set out a series of questions to initiate duty to co-operate engagement on waste. These questions are set out below.

Q1: Do you agree with the following waste exports figures taken from the Waste Data Interrogator and/or Hazardous Waste Data Interrogator?

Q2: Taking into account the guideline levels above, do you consider recent movements of waste from Wandsworth to your area to be 'strategic'?

Q3: Are you aware of any planning reasons why similar movements of waste cannot continue in the future (for example any planned closure of facilities)?

Q4: The NPPF requires planning authorities to prepare statements of common ground to document and address strategic cross-boundary matters. Do you wish to agree a statement of common ground with Wandsworth on cross-boundary movements of waste?

Q5: Are there any other matters you wish to raise at this stage?

3.4 Table 3.1 is an audit of waste planning authorities who receive strategic levels of waste from Wandsworth and a summary of any issues raised during this initial stage of DtC engagement. Full responses to the DtC questions can be found in Appendix B.

Table 3: Audit of engagement with main recipients of Wandsworth's waste exports 2015-2019

Waste Planning Authority	Type of waste received	Any issues raised	SoCG required
Bexley	LACW and C&I	No	No
Cambridgeshire & Peterborough	Hazardous	No	No, providing monitoring does not show any significant change from the current trend.
Derbyshire	Hazardous	No	No
Dudley	Hazardous	No	No
Enfield (North London)	CD&E Hazardous	No	No
Greenwich	CD&E Hazardous	The Charlton Recycling Facility site is currently subject to a planning application, reference 19/3456F. It is therefore not possible to guarantee that the site will be able to continue to handle similar amounts of waste exports from Wandsworth.	No
Havering (East London)	LACW/C&I CD&E Hazardous	Rainham landfill site is due to close in 2024 and there is no new or replacement landfill proposed within Havering.	Yes
Hammersmith & Fulham	Hazardous	No	Yes as part of wider SoCG
Hertfordshire	Hazardous	No	Yes, Herts own SoCG
Hillingdon (West London)	CD&E	Sipson North East Inert Landfill is coming to the end of its operational life and this is reflected in the declining amount of waste accepted from Wandsworth.	No
Kent	Hazardous	No	Yes
Medway	Hazardous	Chatham Dockyard, including waste facilities, may be allocated for redevelopment in the forthcoming Medway Local Plan	Yes
Merton (South London)	CD&E	Reston Waste facility and neighbouring facilities are the subject of objections related to air pollution and associated HGV traffic movements to and from the sites along Weir Road.	Yes
Newham (East London)	LACW/C&I	ELWP is being prepared	No

Waste Planning Authority	Type of waste received	Any issues raised	SoCG required
	CD&E Hazardous		
Norfolk	Hazardous	No	No
Northamptonshire	Hazardous	No	No, providing monitoring does not show any significant change from the current trend.
Nottinghamshire	Hazardous	No	No
OPDC (Ealing)	CD&E	HS2 have leased Willesden Euroterminal for the removal of construction spoil by rail. As such, the exports of similar amounts of waste exports is not expected to continue to be managed through the Willesden Freight Terminal for the duration of the scheduled works.	Yes
Sandwell	Hazardous	No	No
Staffordshire	Hazardous	No	No
Surrey	CD&E Hazardous	A number of sites currently receiving waste from Wandsworth are due to close during the plan period.	Yes
Thurrock	CD&E	Thurrock has declining inert landfill capacity and will not be able to receive similar levels of waste in the medium to longer term. Thurrock is reviewing the final destination of waste received at treatment facilities and transfer stations.	Yes
West Sussex	LACW/C&I	No	No
Wiltshire	Hazardous	No	No
Windsor & Maidenhead	CD&E	Kingsmead Landfill has recently restarted operations but is likely to be completed during the plan period. The Central and Eastern Berkshire authorities are preparing a Joint Minerals and Waste Plan which identifies a considerable waste management capacity gap.	No
Wolverhampton	Hazardous	No	No, providing monitoring does not show any

Waste Planning Authority	Type of waste received	Any issues raised	SoCG required
			significant change from the current trend.

4 Issues Arising from Initial Duty to Co-operate Engagement

- 4.1 The main strategic planning issues raised by authorities who receive significant amounts of waste from Wandsworth relate to the closure, or potential closure, of existing facilities which manage the Borough's waste. This mainly affects CD&E and hazardous waste streams.
- 4.2 Wandsworth, along with most other London Boroughs, cannot accommodate the full range of facilities needed to manage all of its waste arisings, in particular inert landfill and specialist facilities for hazardous waste. Therefore Wandsworth will continue to rely on these types of facilities located outside its administrative area.
- 4.3 Landfill capacity in the wider south east is declining and few landfill sites are being put forward by waste operators. While new landfill sites could come forward during the plan period, declining landfill capacity in the wider south east is an issue for all WPAs preparing plans. It is recognised by all WPAs that there is a continuing need to plan to manage waste further up the waste hierarchy to help reduce the need for landfill capacity.
- 4.4 The destination of CD&E and hazardous waste is largely dependent on market forces and exports will continue to go to the most suitable facility. It is therefore not possible to identify a specific alternative site or sites where waste arising in Wandsworth will go after the closure of the sites identified in Table 3.1 above. In the short term, the remaining landfill void space currently available in the wider south east represents opportunity for the market to find an alternative destination for Wandsworth's waste.
- 4.5 Monitoring of cross-boundary exports, in particular to those destinations outside of London, will be important to understand how the closure of sites affect current patterns of waste movements and management routes. It is expected that the market will find alternative destinations for waste currently managed at facilities due to close and that new facilities and recycling targets will help waste to be managed higher up the waste hierarchy, diverting it away from landfill. A monitoring indicator for waste exports should be included in Wandsworth's Local Plan.
- 4.6 A number of issues related to data have been raised by Medway. Medway do not consider the exports figures contained in the DtC correspondence fully capture the amounts of waste exported to Medway because some waste may have been recorded as originating in "London", "South London" or "Central London" in the Waste Data Interrogator (WDI). There are two responses to this: firstly it is impossible to say how much of Wandsworth's waste, if any, is included under the generalised London origins. Therefore local authority level data is used by waste planning authorities as an approximation of waste movements for the purpose of the duty to co-operate. Secondly, the waste stream under consideration in this case is hazardous waste. The figures are taken from the Hazardous Waste Data Interrogator which is a more accurate record than the Waste Data Interrogator and origins of waste are recorded by local authority only and do not include the generalised London categories. Therefore the

figures represented in the DtC correspondence are considered an appropriate measure of waste exports from Wandsworth to Medway.

5 Next Stages in the Duty to Co-operate

- 5.1 Wandsworth will work towards preparing statements of common ground with each of the WPAs who consider waste exported from Wandsworth to their area to be a strategic issue. Those waste planning authorities are:
- London Borough of Hammersmith & Fulham (part of the main SoCG with Wandsworth)
 - London Borough of Havering
 - Hertfordshire County Council (Hertfordshire's own SoCG)
 - Kent County Council
 - Medway Council
 - London Borough of Merton
 - OPDC
 - Surrey County Council
 - Thurrock Council
- 5.2 The NPPG guidance on plan-making says "A statement of common ground is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. It documents where effective co-operation is and is not happening throughout the plan-making process, and is a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries. In the case of local planning authorities, it also forms part of the evidence required to demonstrate that they have complied with the duty to cooperate." (paragraph 2).
- 5.3 The NPPG guidance on plan-making also sets out what statements of common ground are expected to contain (paragraph 3). The contents relevant to cross-boundary movements of waste include:
- a. a short written description and map showing the location and administrative areas covered by the statement, and a brief justification for these area(s);
 - b. the key strategic matters being addressed by the statement;
 - c. the plan-making authorities responsible for joint working detailed in the statement, and list of any additional signatories (including cross-referencing the matters to which each is a signatory);
 - d. governance arrangements for the cooperation process, including how the statement will be maintained and kept up to date;
 - f. distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area;
 - g. a record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and

- h. any additional strategic matters to be addressed by the statement which have not already been addressed, including a brief description how the statement relates to any other statement of common ground covering all or part of the same area.

5.4 The NPPG also states (paragraph 4) that When authorities are in a position to detail the distribution of identified needs in the defined area (ie f. in the above list), the statement will be expected to set out information on:

- a. the capacity within the strategic policy-making authority area(s) covered by the statement to meet their own identified needs;
- b. the extent of any unmet need within the strategic policy-making authority area(s);
and
- c. agreements (or disagreements) between strategic policy-making authorities about the extent to which these unmet needs are capable of being redistributed within the wider area covered by the statement.

Appendix A: Example DtC Letter

Dear

Duty to Co-operate: cross-boundary movements of waste

I am writing to you on behalf of the London Borough of Wandsworth, as part of the duty to co-operate, about strategic waste exports from Wandsworth to your area.

The London Borough of Wandsworth is currently consulting on a first draft of its new Local Plan (Reg 18 stage). Further information can be found [here](#). The draft Local Plan includes a waste management policy (LP13) and is supported by a [waste evidence base](#).

What constitutes a ‘strategic’ level of waste movement will vary between waste planning authorities, however the guideline levels set out below have been agreed in London, south east and east of England as a starting point for considering whether dialogue is required. These levels are for the total quantum of movement to an area rather than to a single site.

- Non-hazardous waste – more than **5,000 tonnes** per annum
- Hazardous waste - more than **100t** per annum
- Inert waste - more than **10,000t** inert per annum

I have asked five questions below to initiate duty to co-operate engagement on waste.

Q1: Do you agree with the following waste exports figures taken from the Waste Data Interrogator and/or Hazardous Waste Data Interrogator?

Waste Data Interrogator

Site Name	Site Type	Type of Waste	2015	2016	2017	2018	2019

Hazardous Waste Data Interrogator

Type of waste	Management route	2014	2015	2016	2017	2018

Q2: Taking into account the guideline levels above, do you consider recent movements of waste from Wandsworth to your area to be ‘strategic’?

Q3: Are you aware of any planning reasons why similar movements of waste cannot continue in the future (for example any planned closure of facilities)?

Q4: The NPPF requires planning authorities to prepare statements of common ground to document and address strategic cross-boundary matters. Do you wish to agree a statement of common ground with Wandsworth on cross-boundary movements of waste?

Q5: Are there any other matters you wish to raise at this stage?

I would be grateful for a response to the above questions by 1st March 2021. If you have any problems responding, please let me know.

Kind regards

Appendix B: Full Responses from Duty to Co-operate Engagement January – March 2021

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
Bexley	You note below that this cannot be verified in the Waste Data Interrogator but you have explained how they may be derived and I have no reason to assume that they are not correct.	Yes, I agree with the guidelines and would consider the amounts in the table above to be strategic.	No; this is a safeguarded waste management facility within Bexley's Local Plan and therefore similar movements of waste can continue although this is a private facility and the contract would be with Cory, not London Borough of Bexley.	I do not consider that there is a reason for a statement of common ground as there are no strategic matters that need resolving	No
Cambridgeshire & Peterborough	The figures above have been reviewed against the relevant Waste Data Interrogator datasets provided by the Environment Agency. No other movements are identified in the relevant Waste Data Interrogators. The figures have been checked and as presented above are considered accurate.	The National Planning Policy for Waste requires Waste Planning Authorities (WPAs) to take account of wastes arising in what are described as 'other waste planning authority' areas. At a meeting of the East of England Waste Technical Advisory Board held	We are not aware of any reason that the waste movements identified above cannot continue in the future.	The Hazardous Waste Data Interrogator only provides information to a local authority level and does not identify specific facilities as the destination for waste. Given the limited information on hazardous waste available, and that we have not identified any impediments to those waste movements continuing in the future, I am content that this exchange of letters is sufficient in respect of the Duty to Co-operate. If the amounts of waste between Wandsworth and Cambridgeshire & Peterborough should change significantly, I	None identified on the basis of the information received to date.

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
		<p>on 3 April 2014, it was agreed by members that 'strategic' waste movements, i.e. imports and exports between WPA areas, should be regarded as those which exceed the following thresholds:</p> <ul style="list-style-type: none"> • Non-hazardous waste 2,500 tonnes per annum (tpa); • Hazardous waste 100 tpa; and • Inert wastes 5,000 tpa. <p>As such, whilst we acknowledge that what constitutes a 'strategic' level of waste movement will vary between waste planning</p>		<p>would ask that you contact us again.</p>	

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
		<p>authorities, we consider the above thresholds are the relevant starting point for considering whether dialogue is required with the East of England region rather than those set out in your correspondence. Nonetheless, we have done our best to answer each of your questions in turn below:</p> <p>Whilst we do not consider that you are referring to the correct threshold limits in general, as identified above, we do agree that the</p>			


Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
		<p>hazardous waste stream is the only stream of the three listed above to be identified as having movements greater than the threshold, as identified in your letter. It is therefore agreed that the movement of hazardous waste between Wandsworth and Cambridgehire & Peterborough is of a strategic nature.</p>			
Derbyshire	<p>As the figures are taken from the Hazardous Waste Data Interrogator, there is no reason to query them.</p>	<p>D2 consider 1,000t as being strategic and therefore DCC do not consider the levels being exported to</p>	<p>DCC are not aware of any planning reasons why such movements should not continue in the future.</p>	<p>Whilst the levels of waste movements between the authorities are classified as strategic by Wandsworth, they are not seen as strategic for D2 hence it is not considered</p>	<p>There are no further comments to make or matters to raise.</p>

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
		D2 as being strategic.		that a SOCG is needed.	
Dudley	I assume and agree that the information you provide in the table below is accurate – it being sourced directly from the Environment Agency’s (EA) Hazardous Waste Data Interrogator that all waste planning authorities (WPAs) have access to and rely upon.	<p>The West Midlands Resource Technical Advisory Body (WMRTAB) is a group comprising waste planning and management officers from each of the Waste Planning Authorities (WPAs) in the West Midlands, along with representatives from the Environment Agency, waste management industry and environmental organisations.</p> <p>Towards the end of 2013, WMRTAB</p>	I am unaware of any reasons as to why such levels of (2016) hazardous waste movement cannot continue in future – although again noting there have more recently been no such waste movements, and additionally that your table does not identify any specific waste management facilities in Dudley borough in this regard (as I understand it, the EA’s Hazardous Waste Data Interrogator unfortunately does not identify individual sites).	I do not feel that would be worthwhile for Dudley and Wandsworth to enter into and agree a statement of common ground on cross-boundary movements of waste in this instance – as you identify in your table below there being no such movements subsequent to 2016.	I have nothing further to add.

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
		<p>initially adopted its Duty to Co-operate (DtC) thresholds (1000 tonnes per annum, tpa, for hazardous waste and 5000tpa for other waste streams) at or beyond which waste movements are considered strategic and thus we seeking or responding to DtC waste movement requests – it being agreed that adopting these thresholds was on the basis that they be reviewed in 12 months’ time. Subsequently at our WMRTAB meeting</p>			

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
		<p>24th September 2014, the thresholds were again discussed and in the light of experiences gained over the 12 month period, these thresholds were endorsed/c onfirmed for ongoing use by all WPAs across the West Midlands region.</p> <p>Noting the above, I would agree that your 2016 figure of 2,280 tonnes of hazardous waste exported from Wandsworth to Dudley is 'strategic'. However it is also</p>			

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
		important to note from your table below that there were no such hazardous waste movements in the previous year or (notably) the subsequent 3...			
Enfield (North London)	Yes	No, the amounts are very low and historic.	The Chase Farm waste facility no longer operational and waste management is now contracted out. This accounts for the decline in waste movements to zero.	No, a SoCG is not needed.	No.
Greenwich	Yes I agree with the figures showing waste movements between LB Wandsworth and RB Greenwich.	Yes, I consider the movements to be strategic.	<p>Victoria Deep Water Terminal and Tunnel Wharf are protected by their Safeguarded Wharf designations and there are no known planning reasons as to why they cannot continue to handle similar amounts of waste exports from Wandsworth.</p> <p>Charlton Recycling Facility is not one of the listed waste sites in the RBG Core Strategy, but as a site with a permit from the Environment Agency, it is considered to be an existing waste site which is safeguarded by the London Plan and RBG Core Strategy. However, such sites can be developed for alternative uses provided that the satisfactory relocation of the waste site or re-provision of the maximum throughput elsewhere in London can be demonstrated. The Charlton Recycling Facility site is currently subject to a planning application, reference 19/3456F. It is therefore not possible to guarantee that the site will be able to continue to handle similar amounts of waste exports from Wandsworth.</p>	I don't feel a statement of common ground is required, but have no problem in producing one along with Wandsworth if you believe it to be necessary.	I have no other matters to raise at this stage.

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
Havering (East London)	We agree that the waste export data from the Waste Data Interrogator is correct for 2015 to 2019 and that the hazardous waste export data for 2019 is correct, in respect of waste exports from Wandsworth to Havering. We are unable to access the Hazardous Waste data for 2015 to 2018 inclusive.	Yes, we do consider recent movements of waste from Wandsworth to Havering to be strategic.	There are no known planning reasons why exports of similar amounts of waste exports cannot continue to Havering's facilities, with the exception of Rainham landfill site. Rainham landfill site is due to close in 2024 and there is no new or replacement landfill proposed within Havering.	We are happy to consider a Statement of Common Ground with Wandsworth on cross-boundary movements of waste between Wandsworth and Havering.	The London Borough of Havering is a member of the East London Waste Authority (ELWA), the statutory Waste Disposal Authority responsible for the disposal of waste collected by the London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge. The Joint Waste Development Plan for the ELWA boroughs was adopted in 2012 and sets out a planning strategy to 2021 for sustainable waste management. Havering is currently working with the other ELWA boroughs to prepare a new Joint Waste Plan to replace the adopted 2012 plan.
Hammersmith and Fulham	[No response]	No, not in the context of the above.	No	Yes, we would like do this within an overall Statement of Common Ground on the Wandsworth Local Plan.	No
Hertfordshire	We agree with the figures you have provided from the WDI and HWDI, apart from the figures you have provided for the WDI 2019. Our use of the WDI 2019 shows the following exports of waste from Wandsworth to Hertfordshire: 	The thresholds Hertfordshire County Council use to identify strategic cross boundary	We are not aware of any planning reasons why similar waste movements cannot continue. The facility you have identified, Redbournbury Treatment Plant, has permanent planning permission and to the best of our knowledge is still operating. We are not aware of any changes that are likely to occur in the future that will alter this.	Hertfordshire CC has prepared a Draft Statement of Common Ground (SoCG) to support our Draft Waste Local Plan (Regulation 18) which has identified Wandsworth as a	5. We would also like to take this opportunity to notify you that we are preparing a new Waste Local Plan which is currently out for consultation on the draft (Regulation 18) version from 11

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5												
	<table border="1"> <thead> <tr> <th>Site Name</th> <th>Operator</th> <th>Hazardous (t)</th> </tr> </thead> <tbody> <tr> <td>Leyden Road HW TS EPR/SP3130RY</td> <td>Biffa Waste Services Limited</td> <td>6</td> </tr> <tr> <td>Redbournbury Treatment Plant - EPR/BW3281IA</td> <td>Veolia ES (UK) Limited</td> <td>24</td> </tr> <tr> <td>Grand Total</td> <td></td> <td>31</td> </tr> </tbody> </table>	Site Name	Operator	Hazardous (t)	Leyden Road HW TS EPR/SP3130RY	Biffa Waste Services Limited	6	Redbournbury Treatment Plant - EPR/BW3281IA	Veolia ES (UK) Limited	24	Grand Total		31	<p>waste movements (as agreed by the East of England Waste Technical Advisory Body (EoE WTAB) 17 June 2020) are the same as those used by Wandsworth. Given that the only recent year to go above the strategic thresholds was 2016, we do not consider recent movements between Hertfordshire and Wandsworth to be strategic.</p>		<p>signatory. This was emailed to planningpolicy@wandsworth.gov.uk on 19 Jan 2021, and we are currently awaiting a response. Please let me know if you would like me to instead forward our email on to yourself to respond to.</p>	<p>January to 19 March 2021. The Plan and supporting information can be viewed online at https://www.hertfordshire.gov.uk/wlp where further details on how to comment on the Plan can be found. We would greatly appreciate any comments you may have.</p>
Site Name	Operator	Hazardous (t)															
Leyden Road HW TS EPR/SP3130RY	Biffa Waste Services Limited	6															
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Grand Total		31															
Hillingdon (West London)	Yes	Yes	<p>The capacity at Sipson North East Inert Landfill is finite and the site is coming to the end of its operational life. The latest planning application for the site (45408/APP/2017/2075) provided an extension to the backfilling with inert waste to the 30th September 2019. No additional extension has been submitted so I would expect the movements to cease in the 2020 figures or soon after.</p>	<p>Noting the above, there is no need to agree a SoCG.</p>	No												

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
Kent	I can confirm that the information contained in the table below is accurate.	<p>It is the case that the South East Waste Planning Advisory Group has agreed a SoCG in 2020, in which the thresholds for strategic waste movements between authorities the non-hazardous waste (that typically include the HC&I waste streams) as per below:</p> <p>2.11 Where movements of waste between areas are taking place which are of such a size and nature that separate provision would need to be planned for if they were to cease,</p>	The County Council’s permitted waste management capacity is safeguarded by policy of the Kent Minerals and Waste Local Plan 2013-30. There has been no loss of waste management capacity that would prevent a similar pattern of waste movements between our respective authorities.	The need for a Statement of Common Ground (SoCG) is indicated by the fact that hazardous waste is consistently significantly larger than the 100t per annum threshold. This will ensure the matter is formally recorded.	There is nothing the County Council wishes to add at this point.

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
		<p>the Parties agree that there will be a need for dialogue between areas to establish the existence of any planning matter which might hinder such an arrangement in future. Such waste movements are considered to be 'strategic'. The Parties agree that what constitutes a 'strategic' level of waste movements will vary between authorities, however the levels set out below provide a starting point for considering</p>			

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
		<p>whether dialogue is required:</p> <ul style="list-style-type: none"> • Non-hazardous waste – 5,000 tonnes per annum • Hazardous waste 100t per annum • Inert waste - 10,000t inert per annum <p>Therefore, it is considered that there are recent strategic scaled hazardous waste movements between the waste planning authorities of the London Borough of Wandsworth and Kent County Council.</p>			
Medway	However, we do not consider the data displayed in the Table necessarily represents the full extent of exports from LB	This depends on	While it is not clear whether waste from Wandsworth is managed at Berth 6 Chatham Dockyard, there is a	Our understanding is that it is for the plan-	Yes - the Chatham Freight Station facility

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
	<p>Wandsworth to Medway because while the Table above displays data for waste declared as coming from LB Wandsworth, the WDI (2019) also reports the following:</p> <ul style="list-style-type: none"> • 634 tonnes of hazardous waste coming from South London (WPA not codeable); and • 4,200 tonnes of hazardous waste coming from London (WPA not codeable); and • 12,802 municipal type waste coming from London (WPA not codeable); and • 7,345 tonnes of inert/C&D waste coming from London (WPA not codeable). <p>Unless there is evidence to conclude that all waste from the Wandsworth is reported correctly i.e. none is unattributed, it should be assumed that an amount of the un coded waste from London has actually arisen from LB Wandsworth. We would recommend an assessment of these unaccounted for tonnages be undertaken to ascertain what if any tonnage might have arisen from the borough, so that its management is planned for by the source WPAs in London.</p>	<p>the tonnage of unattributed waste considered to arise from Wandsworth. As it stands only the flow to Rochester Clinical Waste facility would be regarded as strategic.</p>	<p>possibility that this site might be allocated for redevelopment in the forthcoming Medway Local Plan.</p>	<p>making WPA to seek to enter into a Statement of Common Ground. So in this case it would be for LB Wandsworth to initiate. We confirm that Medway Council would respond positively to such a request.</p>	<p>is also located in Chatham Dockyard which as above may be allocated for redevelopment in the forthcoming Medway Local Plan. If Chatham Dockyard was to be redeveloped, two facilities that received a total of 8,714 tonnes of municipal waste from an unspecified part of London for management in 2019 would be lost in the medium to long term. What amount of that waste might have arisen from Wandsworth is still to be determined. Medway Council is actively considering how capacity at these facilities might be otherwise provided, in accordance with the approach to be proposed in its forthcoming plan. We note no reciprocal flows to LB Wandsworth from Medway are reported in 2019.</p>
Merton (South London)	Yes	Yes	No. Despite the response to Q2, this relatively modest amount of CDE waste should be able to be treated within Merton. Furthermore, according to the WDI, all the waste movements from Wandsworth are treated at the Reston Waste facility in Weir Road, which is proposed to	Yes	Please note that the Wimbledon Park Resident Association are challenging the soundness of the Submission Draft South

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
			<p>be safeguarded in the Submission Draft South London Waste Plan.</p>		<p>London Waste Plan, in particular with regards to air pollution associated waste related HGV traffic movements to and from the three proposed safeguarded waste management facilities along Weir Road. They have recently raises a new concern, not referred to in their Reg19 response, with regards to the in-combination impacts of the three Weir Road waste management facilities with that of the waste management facility on Riverside Road, within Wandsworth.</p>
Newham (East London)	<p>Our cross-checking of the export figures suggest the data is correct.</p>	<p>Yes, this is a strategic matter for the authority, particularly as much of the waste received in Newham is hazardous, and the higher levels of CDE waste received in 2019 (albeit this figure may prove an outlier</p>	<p>Safeguarded waste sites in the Borough are included in The Joint Waste Development Plan for the East London Waste Authority Boroughs – 2012. Please note, the Borough, in collaboration with the East London Waste Authority and the London Boroughs of Barking & Dagenham, Havering, and Redbridge are commencing review of the 2012 Joint Waste Plan.</p> <p>At this stage, LBN have no further public information to disclose on those Schedule 1 and Schedule 2 sites within the 2012 Joint Waste Plan. However, given the scale of development the Borough is planning for through our adopted 2018 Local Plan and our New London Plan Target, our capacity may be reduced in the longer term, in accordance with current and future planning policies.</p>	<p>At this stage we do not consider a Statement of Common Ground is necessary to collaborate on the issue</p>	<p>No</p>

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
		when compared with the longer-term average).			
Norfolk	I have checked the HWDI and WDI for 2019 and agree with the figures stated below. I have not checked for the previous years' data due to the figures being so small, but have no reason to disagree with the figures stated. The waste from Wandsworth to Norfolk in 2019 is all liquid waste being sent to the M Gaze & Co Limited facility which has permanent permission.	Whilst the hazardous waste movements from Wandsworth to Norfolk were over 100 tonnes in 2019, as this movement has only occurred once in the past 5 years, and also is not recorded in the WDI I do not consider it to be strategic in nature.	No	No	No
Northamptonshire	When looking at Hazardous waste figures the Hazardous Waste Interrogator (HWDI) should be used rather than the Waste Interrogator. Northamptonshire County Council remove the figures in relation to waste transfer to minimise the risk of double counting, therefore when transfer of hazardous waste is removed from the HWDI the figures would be 13.1t from Wandsworth to Northamptonshire in 2019.	Northamptonshire County Council supports the use of thresholds in relation to strategic movements of waste and note that these	The County Council considers that the only strategic (and therefore potentially DtC) matters relating to waste movements from other authorities into Northamptonshire are those relating to hazardous waste and radioactive waste and in essence concern over the long term future of the East Northants Resource Management Facility (ENRMF) in north-east Northamptonshire that currently accepts such waste. However, in this instance the waste does not appear to be going to the ENRMF and the 13.1t is below the threshold considered to be a strategic movement.	However, unless future monitoring evidence suggests significant changes in the future pattern of waste movements between our respective authorities, we are satisfied that Wandsworth have taken appropriate steps in terms of the	Should you require further assistance please do not hesitate to contact us.

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
		<p>figures have been agreed at a number of RTABs, however we believe a figure of 10,000t, or 500t for hazardous waste, should be used when referring to "Strategic". The reasoning for the 10,000 tpa threshold is that movements below this level would seem to indicate one-off or ad-hoc arrangements which by their nature are not strategic, or are smaller quantities that may be able to be accommodated at another facility quite easily.</p>		<p>duty to cooperate and we do not wish to raise any strategic planning issues.</p>	

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
Nottinghamshire	Yes	No	No	No	Thank you for contacting us with regard to the Duty to Cooperate. I can confirm that we agree with the tonnages shown and that these are not considered to be strategic. We are not aware of any planning reasons why these movements could not continue in future. Given the relatively small tonnages, and the single facility involved, Nottinghamshire does not see a need to agree a Statement of Common Ground in this instance and do not have any further issues to raise.
OPDC (Ealing)	We agree with using figures taken from the Waste Data Interrogator.	We note that the guideline levels agreed in London, south east and east of England set out in your email as a starting point for considering whether dialogue is required. The data on waste	With regards to the future availability of this site, please note that Willesden Freight Terminal (also known as the Willesden Euroterminal) site is part of the land subject to the High Speed Two (HS2) Phase One Safeguarding Directions (plan SG-01-006), which are part of the High Speed Rail (London - West Midlands) Act 2017. HS2 have leased Willesden Euroterminal for the removal of construction spoil by rail. As such, the exports of similar amounts of waste exports is not expected to continue to be managed through the Willesden Freight Terminal for the duration of the scheduled works. Policies for Willesden Freight Terminal are included in OPDC's Local Plan and draft modifications to have been developed and approval is currently being sought from OPDC Planning Committee and Board. It is anticipated that these will be submitted to our Inspector for his consideration and consultation would follow.	[No response]	We welcome that the Wandsworth draft Plan is seeking to meet waste needs within the borough.

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
		exports shows that the movements from Wandsworth to the OPDC area have declined over time, and we note that the guideline levels for strategic movements in your email have not been reached since the 2016 Waste Data Interrogator was published.			
Sandwell	Yes	No	No	No, as the movement of waste between Sandwell and Wandsworth is not considered as 'strategic' from Sandwell's point of view.	No
Staffordshire	Yes, these figures appear to be consistent with my interpretation of the same sources.	No, with one exception, the figures are all so low as to be almost	No, typical tonnages are so low as to be insignificant, and even the one larger movement of hazardous waste in 2016 is small in comparison with the quantity of hazardous waste imported into Staffordshire for treatment each year.	No, I do not consider that the scale of the cross-boundary waste movements is such that a statement of common ground would be required.	No

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
		<p>insignificant . While the 2016 data suggest a movement of hazardous waste that would exceed you proposed thresholds for strategic significance, there is no indication of an ongoing pattern, and therefore no need to plan for its continuation.</p>			
Surrey	<p>SCC have checked the waste movements data provided by the London Borough of Wandsworth against the WDI and agree the figures are correct, and that they constitute strategic movements.</p>	<p>The movements of inert waste from the London Borough of Wandsworth to Surrey in 2019 are considered strategic as they exceed the thresholds agreed by SEWPAG.</p>	<p>Redhill / Patteson Court landfill has a planned closure date in 2030. This date is for the completion of the site restoration scheme, and therefore the site is due to stop receiving waste in advance of this date (2027). There are more planned closures of sites in Surrey that receive waste from the London Borough of Wandsworth: Addlestone Quarry (closure date in 2027), Stanwell Quarry (called Stanwell 111 Aggregate Recycling Facility and Stanwell 111 Landfill in the WDI) (closure date in 2027), Hithermoor Recycling and Recovery (closure date in 2022) and Home Farm Extension Landfill Site (closure date in 2020). It is therefore possible that Surrey will not be able to continue to receive quantities of waste comparable to those received in 2012-2018 from the London Borough of Wandsworth from the late 2020s onwards.</p>	<p>As such SCC would be willing to enter a Statement of Common Ground (SCG) with London Borough of Wandsworth under the Duty to Cooperate which could address this issue.</p>	<p>No other matters to raise.</p>

			<p><i>Table 1: Capacity and Closure date information for sites in Surrey which received waste from the London Borough of Wandsworth (LBW) from 2015 and 2019 [Source: WDI 2015-2019, SCC Waste Needs Assessment, 2019 and EA Remaining landfill capacity data 2019]</i></p> <table border="1"> <thead> <tr> <th>Name</th> <th>Site type</th> <th>Waste received from LBW</th> <th>Capacity: 2019 (m3)</th> <th>Capacity: 2019 (tpa)</th> <th>Closure Date</th> </tr> </thead> <tbody> <tr> <td>Addles tone Quarry</td> <td>Landfill</td> <td>CD&E</td> <td>551,145</td> <td></td> <td>2027 (proposed)</td> </tr> <tr> <td>Hither moor Recycling and Recovery Facility</td> <td>Treatment</td> <td>CD&E</td> <td></td> <td>250,000</td> <td>2022</td> </tr> <tr> <td>Home Farm Extension Landfill Site</td> <td>Landfill</td> <td>CD&E</td> <td>0</td> <td></td> <td>2020</td> </tr> <tr> <td>Cranleigh Brick & Tile Co Ltd</td> <td>On/In Land</td> <td>CD&E</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Redhill Landfill NEQ /Paterson Court landfill</td> <td>Landfill</td> <td>CD&E</td> <td>3,661,509</td> <td></td> <td>2030*</td> </tr> <tr> <td>Stanwell 111 Aggregate</td> <td>Treatment</td> <td>CD&E</td> <td></td> <td>164,450</td> <td>2027</td> </tr> </tbody> </table>	Name	Site type	Waste received from LBW	Capacity: 2019 (m3)	Capacity: 2019 (tpa)	Closure Date	Addles tone Quarry	Landfill	CD&E	551,145		2027 (proposed)	Hither moor Recycling and Recovery Facility	Treatment	CD&E		250,000	2022	Home Farm Extension Landfill Site	Landfill	CD&E	0		2020	Cranleigh Brick & Tile Co Ltd	On/In Land	CD&E				Redhill Landfill NEQ /Paterson Court landfill	Landfill	CD&E	3,661,509		2030*	Stanwell 111 Aggregate	Treatment	CD&E		164,450	2027		
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Waste Planning Authority	Q1	Q2	Q3						Q4	Q5
			Recycling Facility							
			Stanwell III Landfill	Landfill	CD&E	101,154		2027		
Thurrock	<p>Thurrock Council is reviewing its data on waste imports and exports and at this moment in time cannot exactly confirm these figures are correct or represent the only exports of waste to Thurrock. However Thurrock considers that your figures would be an appropriate estimation of the waste exports from Wandsworth to Thurrock at this stage of Duty to Cooperate.</p>	<p>Thurrock Council does agree that the recent waste movements from Wandsworth to Thurrock are strategic.</p>	<p>1) It is noted that the majority of waste that Thurrock receives from LB Wandsworth is C,D & E waste. The Thurrock Council adopted Core Strategy (amended 2015) does not make specific provision for an apportionment of C,D&E waste from London boroughs. The New London Plan also does not make such an apportionment. Thurrock Council has yet to prepare a new mineral and waste plan but a key issue will be the inert waste capacity and whether Thurrock will be in a position to continue to receive London's inert waste over the plan period including the specific matter of the quantities imported excavation waste (E waste) to landfill. Thurrock is a member of the East of England Waste Technical Advisory Body and will continue to review cross boundary waste flows and capacity evidence with other waste planning authorities.</p> <p>2) Thurrock Council is currently receiving significant quantities of C,D&E waste from London boroughs, key infrastructure projects and adjoining authorities in the wider south east. Thurrock does not have the inert landfill and other capacity to continue to receive such levels of waste in the medium to longer term.as well as making provision for its own capacity.</p> <p>3) The majority of Thurrock Inert landfill sites only have a short to medium term lifespan and so capacity will diminish unless further void space comes forward. In the case of the site Land north of tilbury this is a site that has now been developed for employment use (warehousing).</p> <p>4) It is noted that an amount of Wandsworth C,D&E s to Thurrock is to transfer stations at East Tilbury and the Port of Tilbury 9 including treatment at the URM facility. Thurrock Council is reviewing the process and treatment</p>						<p>Thurrock Council agrees that a statement of common ground with Wandsworth on cross-boundary movements of waste should be prepared.</p>	<p>Thurrock Council is currently preparing waste arising and capacity evidence to support the proposed Thurrock Minerals and Waste Local Plan. The timetable for the minerals and waste local plan is currently under review. Thurrock Council will wish to continue to engage with planning authorities where there are strategic cross-boundary matters.</p>

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
			of waste at such facilities to determine the final destination and nature of such waste.		
West Sussex	We consider the waste exports to West Sussex set out in your table to be accurate. The Environment Agency Waste Data Interrogators provide the best known data on waste movements and we know of no alternative data that can be used.	Although exports exceeded the 5,000 tonne threshold in 2018 by a small amount, it is not considered that waste exports from Wandsworth to West Sussex, over the time period set out in the table, are strategic.	On the basis that the exports from Wandsworth to West Sussex are small and that the waste facility referenced in the table (Sweeptech Recycling Park) has permanent consent, it is not anticipated that there are any impediments to this continuing.	On the basis that the exports from Wandsworth to West Sussex are small we do not feel it is necessary to be signatory to a SoCG. Correspondence via these letters will demonstrate that we are undertaking effective, constructive, and ongoing engagement.	West Sussex County Council and the South Downs National Park Authority have worked together to prepare the West Sussex Waste Local Plan (adopted in April 2014). The overall aim of the Waste Local Plan is to achieve net self-sufficiency and we recognise that waste crosses administrative boundaries therefore we are keen to engage with authorities on a regular basis and welcome your communication.
Wiltshire	We note the waste movements set out in the table are derived from the Environment Agency's searchable databases. We do not have at this time any additional information on waste movements into Wiltshire beyond the data that can be obtained from the Environment Agency's waste management data.	No, we do not consider these to be a strategic matter.	No	No, see answer to Q2.	No comments to make.
Windsor & Maidenhead	We agree with the exports of waste from Wandsworth to Windsor and Maidenhead, as noted from the WDI.	We agree that the movements are above the adopted thresholds, but do not consider them to be a strategic issue.	Kingsmead Landfill has not been operational for a number of year, but seems to have restarted operations. At the time it had around 4 million tonnes inert landfill void left, however it has received around 1 million tonnes of waste in the past two years. If it continues at this rate, it would likely be completed by 2026. In the meantime, we are not aware of any planning reasons why the movements cannot continue.	A statement of common ground with Wandsworth regarding these movements is not considered necessary. If Wandsworth were to plan on relying on Windsor and Maidenhead capacity specifically (alone, or in combination with capacity at	Windsor and Maidenhead, along with the three other Central and Eastern Berkshire authorities mentioned are in the process of preparing a Joint Minerals and Waste Plan (please see www.hants.gov.uk/berksconsult). This Plan has gone through the pre-submission

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
				<p>Wokingham, Bracknell and Reading) to meet their ongoing waste management needs, then further discussions as to the need for a statement of common ground would be welcomed.</p>	<p>consultation and is to be submitted shortly. The Plan identifies a considerable waste management capacity gap that the available allocations are not able to meet.</p>
<p>Wolverhampton</p>	<p>I agree that the information you provide in the tables are accurate – it being sourced directly from the Environment Agency’s (EA) Hazardous Waste Data Interrogator/ Waste Data Interrogator, that all waste planning authorities (WPAs) have access to and rely upon.</p>	<p>The West Midlands Resource Technical Advisory Body (WMRTAB) is a group comprising waste planning and management officers from each of the Waste Planning Authorities (WPAs) in the West Midlands, along with representatives from the Environment Agency, waste management industry and environment</p>	<p>Given the commentary above, I am unaware of any known planning reasons as to why such levels of (2018-2019 - HWDI) hazardous waste movement cannot continue in future. The table does not identify any specific waste management facilities in Wolverhampton to ascertain if there have been on the ground changes to use of receiving waste sites (as you know the EA’s Hazardous Waste Data Interrogator unfortunately does not identify individual sites).</p> <p>The Horsley Field Hub Site recorded on the WDI receiving 93 tonnes in 2018, is operated by Dunton Environmental Limited. The operator has recently submitted an application to extend the temporary operational time period to 18th September 2021.</p>	<p>On balance taking into account the most recent downward trend for hazardous waste imports, I do not feel that would be worthwhile for Wolverhampton and Wandsworth to enter into and agree a statement of common ground on cross-boundary movements of waste in this instance.</p> <p>This position can be re-visited if Wandsworth’s monitoring of waste movements and 2020 EA data identify a significant change from the current trend.</p>	<p>No</p>

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
		<p>tal organisation s.</p> <p>Towards the end of 2013, WMRTAB initially adopted its Duty to Co-operate (DtC) thresholds:</p> <ul style="list-style-type: none"> •Hazardous waste - 1000 tonnes per annum (tpa) •Other waste streams – 5000 tonnes per annum (tpa) at or beyond which waste movements are considered strategic and thus we seeking or responding to DtC waste movement requests – it being agreed that adopting these 			

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
		<p>thresholds was on the basis that they be reviewed in 12 months' time. Subsequently at our WMRTAB meeting 24th September 2014, the thresholds were again discussed and in the light of experiences gained over the 12 month period, these thresholds were endorsed/c onfirmed for ongoing use by all WPAs across the West Midlands region.</p> <p>In light of this, I would agree that your 2018 and 2019 figures of</p>			

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
		<p>5,171 and 1314 tonnes respectively (source HWDI), of hazardous waste exported from Wandsworth to Wolverhampton is considered 'strategic'.</p> <p>It is also important to note from your table that the 3 year trend up to 2017, showed no imports from Wandsworth to Wolverhampton, with 2018 appearing as a unexpected sharp spike up to 5,171 tonnes. However, the following year there was a</p>			

Waste Planning Authority	Q1	Q2	Q3	Q4	Q5
		<p>significant reduction, such that the strategic threshold was over by 314 tonnes. It may well be that this declining trend will continue into 2020-2021, and come back down to a figure not considered to be strategic in waste movement terms.</p> <p>The Horsley Field Hub Site recorded on the WDI receiving 93 tonnes in 2018 is lower than both our defined strategic thresholds.</p>			