

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

Updated
April 2022



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Contents

1. Purpose of the report.....	3
2 Picture of waste exports	4
3 Audit of engagement with waste planning authorities	8
4 Issues Arising from Initial Duty to Co-operate Engagement.....	13
5 Statements of Common Ground	14
Appendix A: Example DtC Letter.....	16
Appendix B: Full Responses from Duty to Co-operate Engagement January – March 2021 ..	18
Appendix C: Statements of Common Ground	46

1. Purpose of the report

- 1.1 A Duty to Co-operate report published in May 2021¹ provided an audit and analysis of the issues raised during the initial duty to co-operate engagement on waste exports January-March 2021, which formed part of Wandsworth’s draft Local Plan Regulation 18 consultation. Further engagement on waste exports took place in January 2022 and this Update provides a summary of this engagement and the resulting Statements of Common Ground between Wandsworth and waste planning authorities who receive strategic amounts of waste exports from the Borough.
- 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, including the hazardous element of these 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 an amount of waste equivalent to its own waste arising, there will still be some waste that cannot be managed within the borough because there is not a full range of suitable facilities. Wandsworth identified twenty six waste planning authorities (or groups of waste planning authorities) who receive of ‘strategic’ amounts of waste exports from the Borough. A ‘strategic’

¹ [Wandsworth Local Plan Review: Duty to Co-operate Report on Waste Exports \(May 2021\)](#)

amount of waste is that over certain thresholds which have been agreed by waste planning authorities across the wider south east.

- 1.7 In January 2021 Wandsworth 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. Ten of these authorities requested that a statement of common ground (SoCG) on waste movements to set out and agree the strategic waste issues and future governance arrangements. These SoCG are available at Appendix C except for those with the London Boroughs of Hammersmith & Fulham and Merton which, as neighbouring Boroughs, are parties to a separate general SoCG with Wandsworth, which includes a section on strategic waste movements.

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.

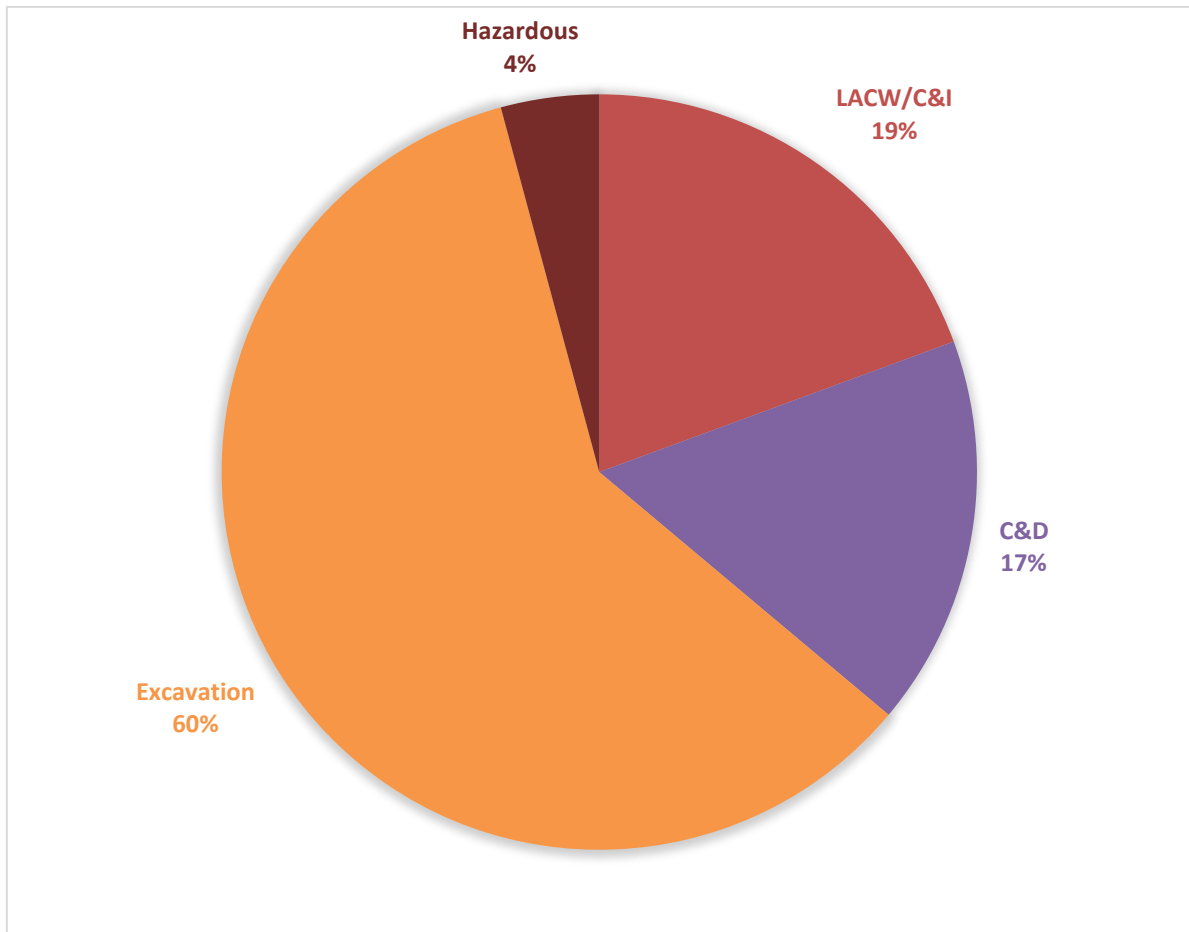
Table 2.1: Exports from Wandsworth by waste type 2015-2019 (all waste streams)

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 (19%) 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.

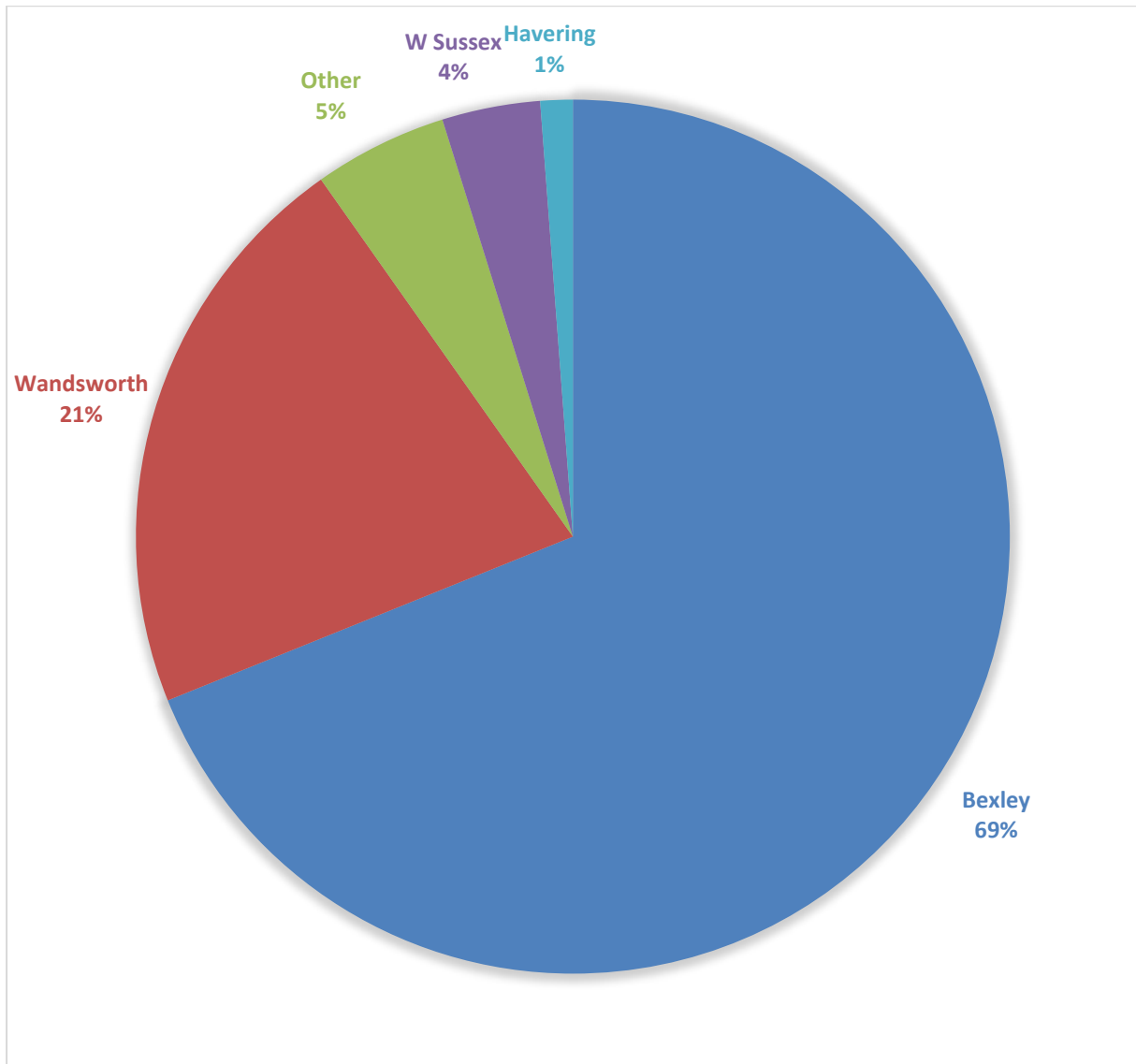
Figure 1: Types of waste exported from Wandsworth 2015-2019



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.

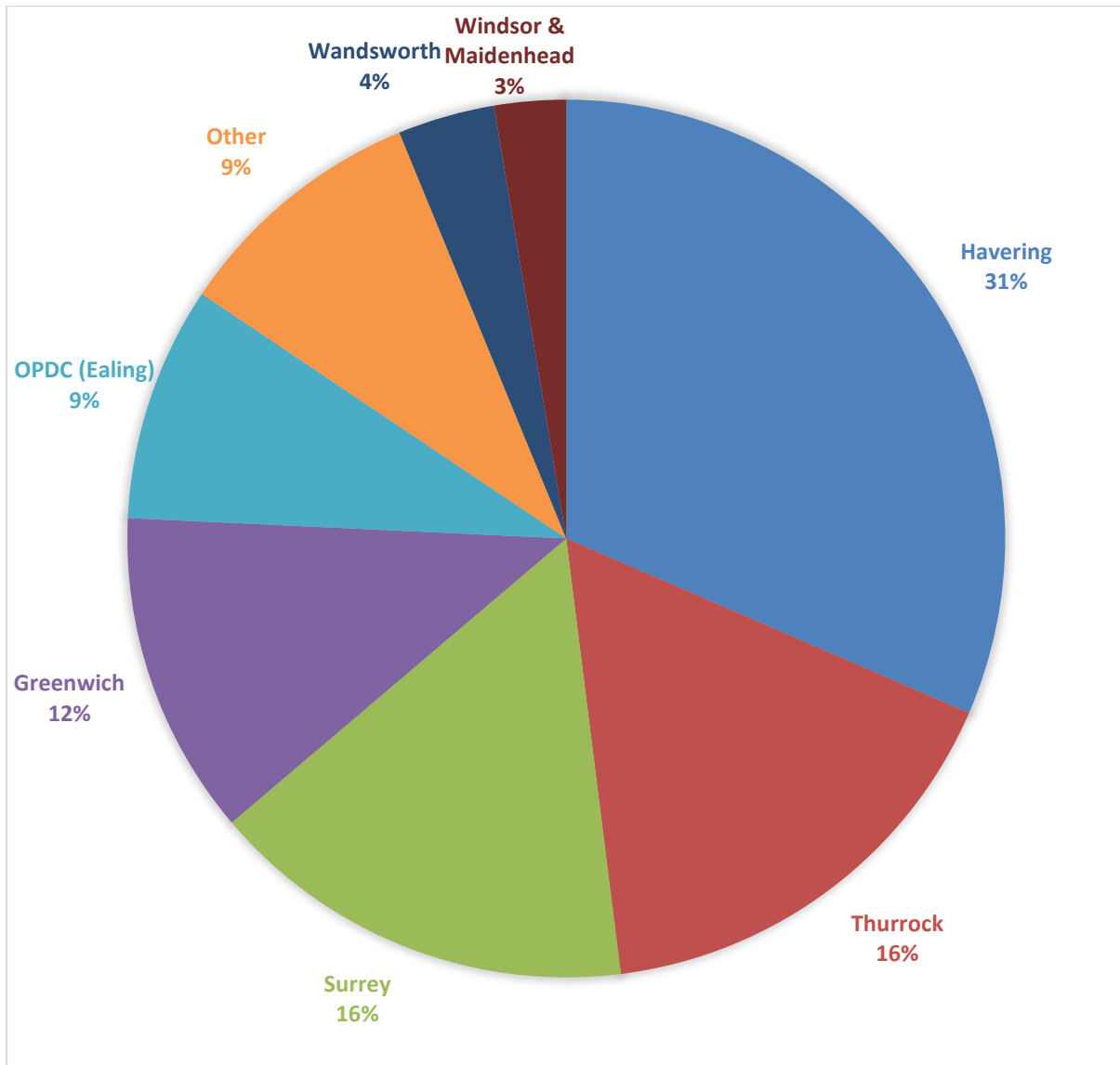
Figure 2: Where was LACW/C&I managed 2015-2019?



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).

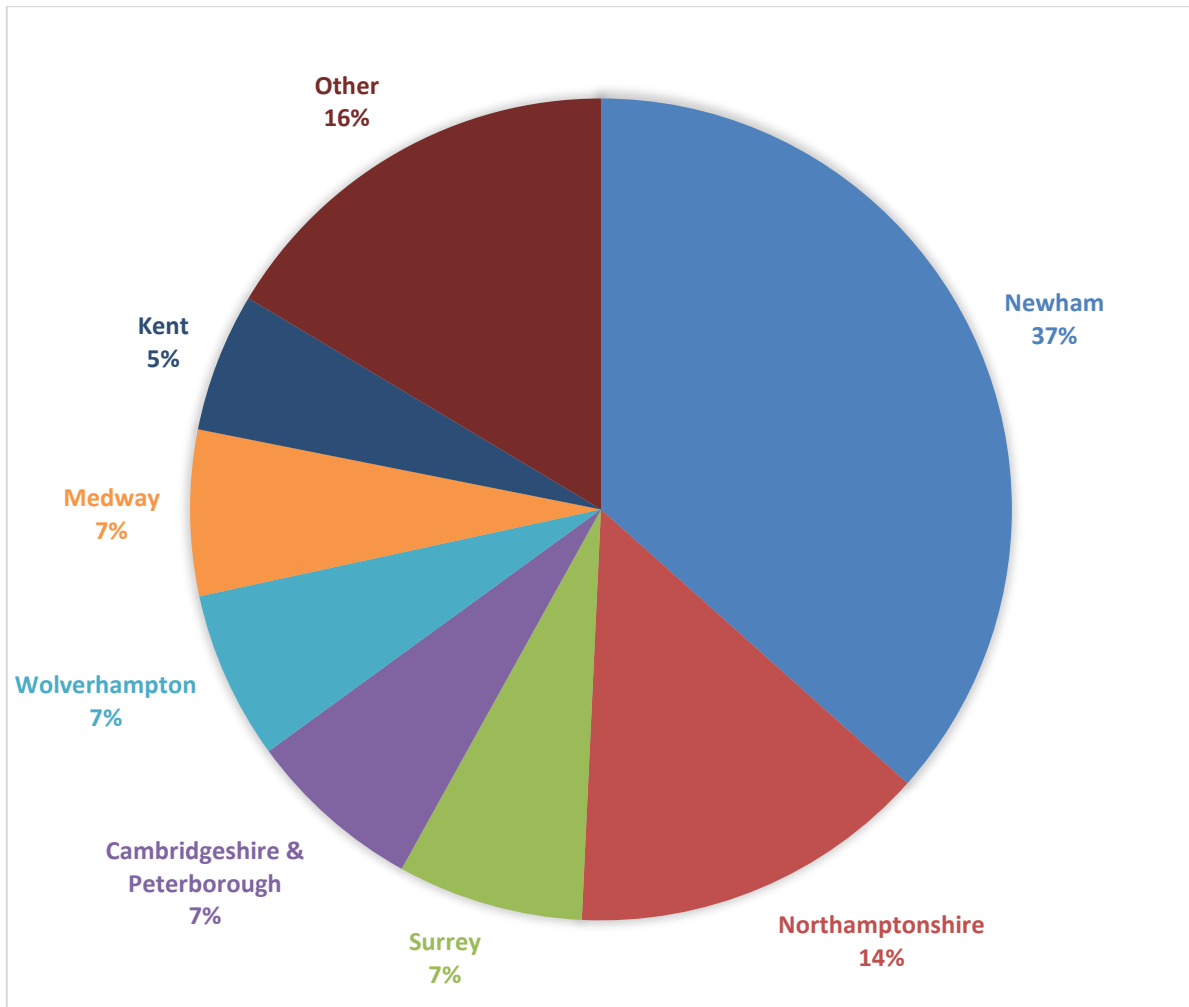
Figure 3: Where was CD&E waste managed 2015-2019?



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	Yes
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
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 Statements of Common Ground

- 5.1 Wandsworth has prepared 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 Bexley
 - London Borough of Hammersmith & Fulham (part of the main SoCG with Wandsworth)
 - London Borough of Havering
 - Hertfordshire County Council
 - Kent County Council
 - Medway Council
 - London Borough of Merton (part of the main SoCG with Wandsworth)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 In the case of waste exports, the key issue is whether there are any planning reasons why similar amounts of waste cannot continue to be managed at the facility or facilities in the receiving waste planning authority area. A common example is that a facility is due to close.
- 5.4 The duty to co-operate process did not identify any planning reasons which would prevent similar amounts of waste being exported to Bexley, Hammersmith & Fulham, Hertfordshire, Kent, Medway or Merton.
- 5.5 Site closures have been identified in Thurrock (East Tilbury Quarry which ceased operation in 2021) and Havering (Rainham Landfill which is due to close in 2024). Wandsworth’s CD&E waste is not expected to continue to be received at these sites after these dates. Through the SoCG, the parties agree that the destination of waste is largely dependent on market forces and exports will continue to go to the most suitable facility. The parties agree that it is not possible to identify a specific alternative landfill site or sites where Wandsworth’s waste will go after the closure of Rainham and East Tilbury Quarry landfill sites. The parties also agree that landfill void

space in the wider south east represents sufficient opportunity for the market to find an alternative destination for similar amounts of waste currently exported from Wandsworth to Rainham and East Tilbury Quarry landfill sites.

- 5.6 Future site closures have also been identified in OPDC (Willesden Freight Terminal) and Surrey (Addlestone Quarry), but there have been no recent exports from Wandsworth to these facilities and it seems that the market has already found alternative facilities for the CD&E waste originating in Wandsworth.
- 5.7 Some of Medway's waste management facilities may be allocated for redevelopment in the forthcoming Local Plan. One such facility receives around 6,000 tonnes of waste a year with the WDI origin of 'London' and therefore may include waste from Wandsworth, although this can never be known for sure. Once plans for this site are known, Medway will engage again with Wandsworth on this matter.
- 5.8 In summary there are no 'showstoppers' to prevent Wandsworth delivering its Local Plan waste policy objectives. The site closures identified through the duty to co-operate engagement affect CD&E waste only and the market can and will find alternative facilities or beneficial uses, as it has already done in some cases.
- 5.9 The full statements of common ground can be found at Appendix C of this Duty to Co-operate Report, except for those with the London Boroughs of Hammersmith & Fulham and Merton which, as neighbouring Boroughs, are parties to a separate general SoCG with Wandsworth, which includes a section on strategic waste movements.

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 Wadsworth 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		
<p>Havering (East London)</p>	<p>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.</p>	<p>Yes, we do consider recent movements of waste from Wandsworth to Havering to be strategic.</p>	<p>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.</p>	<p>We are happy to consider a Statement of Common Ground with Wandsworth on cross-boundary movements of waste between Wandsworth and Havering.</p>	<p>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.</p>		
<p>Hammersmith and Fulham</p>	<p>[No response]</p>	<p>No, not in the context of the above.</p>	<p>No</p>	<p>Yes, we would like do this within an overall Statement of Common Ground on the Wandsworth Local Plan.</p>	<p>No</p>		
<p>Hertfordshire</p>	<p>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:</p> <table border="1" data-bbox="331 1281 920 1366"> <tr> <td>Sum of Tonnes Received</td> <td>Basic Waste Cat</td> </tr> </table>	Sum of Tonnes Received	Basic Waste Cat	<p>The thresholds Hertfordshire County Council use to identify strategic cross boundary</p>	<p>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.</p>	<p>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</p>	<p>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</p>
Sum of Tonnes Received	Basic Waste Cat						

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															
Redbournbury Treatment Plant - EPR/BW3281IA	Veolia ES (UK) Limited	24															
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
		<p>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.</p>			
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 /Patte son 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 /Patte son 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		
			* expected to stop receiving waste in 2027							
Thurrock	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.	Thurrock Council does agree that the recent waste movements from Wandsworth to Thurrock are strategic.	<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>						Thurrock Council agrees that a statement of common ground with Wandsworth on cross-boundary movements of waste should be prepared.	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.

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>			

Appendix C: Statements of Common Ground

- London Borough of Bexley
- London Borough of Havering
- Hertfordshire County Council
- Kent County Council
- Medway Council (DRAFT awaiting signature)
- Old Oak Common and Park Royal Development Corporation (OPDC)
- Surrey County Council
- Thurrock Council

Statement of Common Ground between London Borough of Wandsworth and London Borough of Bexley covering strategic waste matters

1. Parties involved

- London Borough of Wandsworth
- London Borough of Bexley

2. Strategic geography

London Borough of Wandsworth

LB Wandsworth is an inner London borough of around 35km² with a northern boundary on the River Thames between Nine Elms and Putney. Centred around Wandsworth Town and the Wandle Valley, the borough includes within it the town centres at Tooting, Balham, Clapham Junction, Wandsworth and Putney and the commons at Clapham, Tooting, Wandsworth and Putney / Wimbledon. It shares significant boundaries with adjacent boroughs – Lambeth to the east (10km boundary), Merton to the south (10km) and Richmond the west (8km). A relatively short boundary (c. 600m) exists with the Royal Borough of Kingston-upon-Thames in the south-west of the borough at Putney Vale. Across the River Thames, Wandsworth shares a boundary with Hammersmith and Fulham (Putney to Battersea), Kensington and Chelsea (Battersea to Chelsea Bridge) and Westminster (Chelsea Bridge to Nine Elms). Eight bridges link the south to the north bank.

London Borough of Bexley

Bexley is an outer London Borough located in the east of London on the edge of Kent. Bexley shares significant boundaries with adjacent boroughs – Royal Greenwich to the west and Bromley to the south. Across the River Thames, Bexley shares a boundary with Havering and Barking and Dagenham. As an outer London borough, Bexley shares a significant boundary with Dartford Borough Council and a very small boundary with Sevenoaks Borough Council, both districts in Kent, and across the River Thames a small boundary with the unitary authority of Thurrock in Essex. Some of the borough's characteristics are shared with one or more of its neighbours, such as its industrial legacy, suburban character, metropolitan green belt and water courses, including the River Thames.

3. Strategic waste issues

Wandsworth is planning for net self-sufficiency for Local Authority Collected Waste (LACW), Commercial & Industrial waste (C&I) and Construction & Demolition waste C&D) and a target of 95% beneficial use of excavation waste. Wandsworth's Local Plan is being reviewed. It safeguards existing waste sites and identifies suitable areas for new waste facilities to meet the capacity gap for the London Plan apportionment target.

Bexley submitted its Local Plan to the Secretary of State in November 2021 for independent examination. Bexley plans for waste as part of the South East London Joint Waste Planning Group (SELJWPG) along with London boroughs of Bromley, Lewisham, Greenwich, Southwark and the City of London. Bexley has formally accepted responsibility for meeting the waste management capacity for London Plan waste apportionment requirements identified for the City of London and City of Westminster.

Both parties agree that, due to the timing of Bexley’s Local Plan examination, SELJWPG is not currently in a position to consider a request from Wandsworth to help meet the Borough’s apportionment target. Both parties note that, where monitoring demonstrates that waste management capacity to meet Wandsworth’s apportionment target is unlikely to be achieved by 2026, Wandsworth may seek help from SELJWPG to meet the apportionment target.

Both parties agree the following thresholds to indicate ‘strategic’ waste movements:

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

London Borough of Bexley receives strategic amounts of local authority collected waste exports from Wandsworth.

Both parties agree the following figures produced by Defra².

Wandsworth exports to Bexley 2015-2019 (tonnes)

Site name	Site type	Waste	2015	2016	2017	2018	2019
Belvedere energy recovery facility	EfW	HIC	82,157	83,111	82,638	80,915	79,854

Source: [Statistical data set ENV18 - Local authority collected waste: annual results tables](#)

Both parties agree there are no known planning reasons why exports of similar amounts of waste exports cannot continue.

4. Governance arrangements

Both parties agree to monitor waste movements and engage again if there are significant increases in the amount of waste exported from Wandsworth to Bexley.

Both parties agree to engage again if there are any significant operational changes to facilities receiving waste exports from Wandsworth.

² 2020 figures have not been included as this is an anomalous year due to the Covid-19 pandemic.

5. Signatories

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.



Signed:

Name: Jenifer Jackson

Position: Assistant Director, Environment and
Community Services (Planning and Transport
Strategy)

London Borough of Wandsworth



Signed:

Name: Jane Richardson

Position: Deputy Director Housing and
Strategic Planning

London Borough of Bexley

Statement of Common Ground between London Borough of Wandsworth and London Borough of Havering covering strategic waste matters

1. Parties involved

- London Borough of Wandsworth
- London Borough of Havering

2. Strategic geography

London Borough of Wandsworth

LB Wandsworth is an inner London borough of around 35km² with a northern boundary on the River Thames between Nine Elms and Putney. Centred around Wandsworth Town and the Wandle Valley, the borough includes within it the town centres at Tooting, Balham, Clapham Junction, Wandsworth and Putney and the commons at Clapham, Tooting, Wandsworth and Putney / Wimbledon. It shares significant boundaries with adjacent boroughs – Lambeth to the east (10km boundary), Merton to the south (10km) and Richmond the west (8km). A relatively short boundary (c. 600m) exists with the Royal Borough of Kingston-upon-Thames in the south-west of the borough at Putney Vale. Across the River Thames, Wandsworth shares a boundary with Hammersmith and Fulham (Putney to Battersea), Kensington and Chelsea (Battersea to Chelsea Bridge) and Westminster (Chelsea Bridge to Nine Elms). Eight bridges link the south to the north bank.

London Borough of Havering

The London Borough of Havering is an outer London Borough, bordered to the west and south by the London Boroughs of Redbridge, Barking & Dagenham and Bexley, and by Essex to the east and north. The London Borough of Havering is one of four East London Boroughs who are working together to plan for waste in the area.

3. Strategic waste issues

Wandsworth is planning for net self-sufficiency for Local Authority Collected Waste (LACW), Commercial & Industrial waste (C&I) and Construction & Demolition waste (C&D) and a target of 95% beneficial use of excavation waste. Wandsworth's Local Plan is being reviewed. It safeguards existing waste sites and identifies suitable areas for new waste facilities to meet the capacity gap for the London Plan apportionment target. Havering plans for waste through the East London Waste Plan (ELWP) along with the London Boroughs of Barking & Dagenham, Newham and Redbridge. The East London Boroughs have prepared a new joint Waste Data Study but this is not yet published. The East London Boroughs do not yet have an agreement in place to work jointly on a new East London Waste Plan and will consider this after May 2022.

Both parties agree that the East London Boroughs are not currently in a position to consider a request from Wandsworth to help meet the Borough's apportionment target. Both parties agree that, where monitoring demonstrates that waste management capacity to

meet Wandsworth’s apportionment target is unlikely to be achieved by 2026, Wandsworth may seek help from the East London Boroughs to meet the apportionment target.

Both parties agree the following thresholds to indicate ‘strategic’ waste movements:

- 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

The London Borough of Havering receives a strategic amount of waste exports from Wandsworth.

Both parties agree the following waste export figures generated by the Waste Data Interrogator³.

Wandsworth exports to Havering (East London) (tonnes)

Site name	Site type	Waste	2015	2016	2017	2018	2019
Frog Island	Treatment	CDE	0	4,366	5,384	4,607	5,238
PLA Silt Lagoons	On/In Land	CDE	0	7,559	0	9,252	242,600
Rainham Jetty WTS	Transfer	CDE	0	3,918	12,794	0	0
Rainham Landfill	Landfill	CDE	30,465	184,158	25,788	20,348	1,913
Rainham MRF	Treatment	HIC	6,513	0	0	0	0
Veolia Inert Soils	Treatment	CDE	6,448	1,292	0	0	0
Total	All	CDE	38,448	201,473	44,207	34,590	250,313
Total	All	HIC	6,855	210	21	194	10

Source: Waste Data Interrogator 2015-2019

Both parties agree the following figures generated by the Hazardous Waste Data Interrogator.

Hazardous waste exports from Wandsworth to Havering (East London) (tonnes)

WPA	Description	Source	2015	2016	2017	2018	2019
East London (Havering)	Not Otherwise Specified	HWDI	200	138	148	182	470
	N/A	WDI	-	-	-	-	-

Source: Hazardous Waste Data Interrogator 2015-2019

Both parties agree 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.

Both parties agree that Rainham landfill site is due to close in 2024 and it is unlikely that Wandsworth’s CD&E waste exports will be received at this site after this date.

³ 2020 figures have not been included as this is an anomalous year due to the Covid-19 pandemic.

Both parties agree that the destination of waste is largely dependent on market forces and exports will continue to go to the most suitable facility. Therefore it is not possible to identify a specific alternative landfill site or sites where Wandsworth's waste will go after the closure of Rainham landfill site. Landfill void space in the wider south east represents sufficient opportunity for the market to find an alternative destination for similar amounts of waste currently exported from Wandsworth to Rainham landfill.

4. Governance arrangements

Both parties agree to monitor waste movements through Authority Monitoring Reports and engage again if these change significantly from the current trend.

Both parties agree to engage again if there are any significant operational changes to facilities receiving waste exports from Wandsworth.

5. Signatories

All parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed: 

Name: Jenifer Jackson

Position: Assistant Director, Environment and Community Services (Planning and Transport Strategy)

London Borough of Wandsworth

Signed: 

Name: Helen Oakerbee

Position: Assistant Director of Planning

London Borough of Havering

Statement of Common Ground between London Borough of Wandsworth and Hertfordshire County Council covering strategic waste matters

1. Parties involved

- London Borough of Wandsworth
- Hertfordshire County Council

2. Strategic geography

London Borough of Wandsworth

LB Wandsworth is an inner London borough of around 35km² with a northern boundary on the River Thames between Nine Elms and Putney. Centred around Wandsworth Town and the Wandle Valley, the borough includes within it the town centres at Tooting, Balham, Clapham Junction, Wandsworth and Putney and the commons at Clapham, Tooting, Wandsworth and Putney / Wimbledon. It shares significant boundaries with adjacent boroughs – Lambeth to the east (10km boundary), Merton to the south (10km) and Richmond the west (8km). A relatively short boundary (c. 600m) exists with the Royal Borough of Kingston-upon-Thames in the south-west of the borough at Putney Vale. Across the River Thames, Wandsworth shares a boundary with Hammersmith and Fulham (Putney to Battersea), Kensington and Chelsea (Battersea to Chelsea Bridge) and Westminster (Chelsea Bridge to Nine Elms). Eight bridges link the south to the north bank.

Hertfordshire County Council

The county of Hertfordshire lies to the north of London and shares its border with several London boroughs. Hertfordshire's close proximity to London, strong communication links, highly skilled workforce and good quality of life have attracted a wide range of businesses to the county. This proximity also leads to the cross-boundary movement of differing waste types. Hertfordshire comprises eleven planning authorities: the county council and ten district and borough councils. As a Waste Planning Authority, Hertfordshire County Council, engages with its own district and borough councils, London boroughs, the GLA and Waste Planning Authorities further afield.

3. Strategic waste issues

Wandsworth is planning for net self-sufficiency for Local Authority Collected Waste (LACW), Commercial & Industrial waste (C&I) and Construction & Demolition waste C&D) and a target of 95% beneficial use of excavation waste.

Both parties agree the following thresholds to indicate 'strategic' waste movements:

- 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

Hertfordshire received strategic amounts of hazardous waste exports from Wandsworth in 2016 and limited amounts of other waste streams which are not considered to be strategic.

Both parties agree the following figures from the Hazardous Waste Data Interrogator⁴.

Hazardous waste exports from Wandsworth to Hertfordshire (tonnes)

WPA	Description	Source	2015	2016	2017	2018	2019
Hertfordshire	Mainly Oil and Oil/Water Mixtures	HWDI	41	226	74	37	34
	Redbournbury Treatment Plant	WDI	16	15	41	8	0

Source: Hazardous and Waste Data Interrogators 2015-2019

Both parties agree there are no known planning reasons why exports of similar amounts of waste cannot continue. The majority of the waste historically has been received at Redbournbury Treatment Plant. This site has permanent planning permission and is currently still operational.

4. Governance arrangements

Both parties agree to monitor waste movements on an annual basis and engage again if these change significantly from the current trend.

Both parties agree to engage again if there are any significant operational changes to hazardous waste sites within the county, which could be the facilities in Hertfordshire receiving waste exports from Wandsworth.

5. Signatories

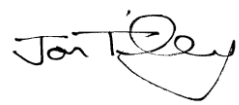
Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed: 

Signed:

Name: Jenifer Jackson

Position: Assistant Director, Environment and Community Services (Planning and Transport Strategy)



Signed:

Name: Jonathan Tiley

Position: Head of Service

Hertfordshire County Council

London Borough of Wandsworth

⁴ 2020 figures have not been included as this is an anomalous year due to the Covid-19 pandemic.

Statement of Common Ground between London Borough of Wandsworth and Kent County Council covering strategic waste matters

April 2022

1. Parties involved

- London Borough of Wandsworth
- Kent County Council

2. Strategic geography

London Borough of Wandsworth

LB Wandsworth is an inner London borough of around 35 square kilometres with a northern boundary on the River Thames between Nine Elms and Putney. Centred around Wandsworth Town and the Wandle Valley, the borough includes within it the town centres at Tooting, Balham, Clapham Junction, Wandsworth and Putney and the commons at Clapham, Tooting, Wandsworth and Putney / Wimbledon. It shares significant boundaries with adjacent boroughs – Lambeth to the east (10km boundary), Merton to the south (10km) and Richmond the west (8km). A relatively short boundary (c. 600m) exists with the Royal Borough of Kingston-upon-Thames in the south-west of the borough at Putney Vale. Across the River Thames, Wandsworth shares a boundary with Hammersmith and Fulham (Putney to Battersea), Kensington and Chelsea (Battersea to Chelsea Bridge) and Westminster (Chelsea Bridge to Nine Elms).

Kent County Council

Kent is located in the south east corner of the United Kingdom (UK). The county consists of 12 districts, and the Ebbsfleet Development Corporation area which lies partially with the Boroughs of Dartford and Gravesham in the north west of the county. It is surrounded on two sides by water: the River Thames to the north and the English Channel to the south-east. It also neighbours London on its north-west perimeter. It has excellent transportation links by road, rail and water with northern France, London, Essex and the South East of England. Kent is the largest non-metropolitan local authority area in England and 85% of the county is defined as rural.

3. Strategic waste issues

Wandsworth is planning for net self-sufficiency for Local Authority Collected Waste (LACW), Commercial & Industrial waste (C&I) and Construction & Demolition waste C&D) and a target of 95% beneficial use of excavation waste.

Both parties agree the following thresholds to define ‘strategic’ waste movements in relation to waste movements between the County of Kent and the London Borough of Wandsworth.

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

Historically Kent has received strategic amounts of hazardous waste exports from Wandsworth.

Both parties agree the following figures from the Hazardous Waste Data Interrogator⁵. Both parties note that while the Hazardous Waste Data Interrogator (HWDI) is considered the most accurate data source for hazardous waste, it does not include information on recipient sites; therefore information from the Waste Data Interrogator (WDI) is also included to provide further details on the sites receiving hazardous waste exports from Wandsworth.

Hazardous waste exports from Wandsworth to Kent (tonnes)

WPA	Description	Source	2015	2016	2017	2018	2019
Kent	Mix of different waste types	HWDI	895	1,147	1,042	1,201	1,240
	Larkfield Clinical Waste Facility	WDI	126	140	60	81	57
	Safetykleen U K	WDI	0	20	80	6	0
	Sweeep Kuusakoski Ltd	WDI	0	16	16	525	725
	Unit D2 Springhead Enterprise Park	WDI	0	1	4	4	6

Source: Hazardous Waste Data Interrogator and Waste Data Interrogator 2015-2019

Both parties agree there are no known planning reasons why exports of similar amounts of waste exports cannot continue for the current adopted Kent Minerals and Waste Local Plan period of 2013-30 (currently subject to statutory review) and Wandsworth’s Local Plan (currently at submission stage). For the avoidance of doubt, there are no strategic quantities of CD&E C&I and LACW imported into Kent from Wandsworth and this is not anticipated to change.

4. Governance arrangements

Both parties agree to monitor waste movements through Authority Monitoring Reports and engage again if these change significantly from the current trend.

Both parties agree to engage again if there are any significant operational changes to facilities receiving waste exports from Wandsworth.

⁵ 2020 figures have not been included as this is an anomalous year due to the Covid-19 pandemic.

5. Signatories

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

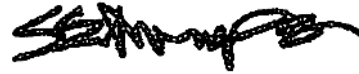
Signed: 

Name: Jenifer Jackson

Position: Assistant Director for Environment and Community Services (Planning and Transport)

London Borough of Wandsworth

Signed:



Name: Sharon Thompson

Position: Head of Planning Applications

Kent County Council

28th April 2022

Draft Statement of Common Ground between London Borough of Wandsworth and Medway Council covering strategic waste matters

1. Parties involved

- London Borough of Wandsworth
- Medway Council

2. Strategic geography

London Borough of Wandsworth

LB Wandsworth is an inner London borough of around 35km² with a northern boundary on the River Thames between Nine Elms and Putney. Centred around Wandsworth Town and the Wandle Valley, the borough includes within it the town centres at Tooting, Balham, Clapham Junction, Wandsworth and Putney and the commons at Clapham, Tooting, Wandsworth and Putney / Wimbledon. It shares significant boundaries with adjacent boroughs – Lambeth to the east (10km boundary), Merton to the south (10km) and Richmond the west (8km). A relatively short boundary (c. 600m) exists with the Royal Borough of Kingston-upon-Thames in the south-west of the borough at Putney Vale. Across the River Thames, Wandsworth shares a boundary with Hammersmith and Fulham (Putney to Battersea), Kensington and Chelsea (Battersea to Chelsea Bridge) and Westminster (Chelsea Bridge to Nine Elms). Eight bridges link the south to the north bank.

Medway Council

Medway is made up of a large urban area built up between the river and the downs in north Kent, and an extensive rural area to the north on the Hoo Peninsula. It is distinctive for its five historic towns, its waterfront regeneration, and its dramatic landscapes, with juxtapositions of the natural environment with modern infrastructure and commercial life.

3. Strategic waste issues

Both parties agree the following thresholds to indicate ‘strategic’ waste movements:

- 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

Medway receives hazardous waste exports from Wandsworth which exceed 100 tpa.

Both parties agree the following figures from the Hazardous Waste Data Interrogator⁶ and Waste Data Interrogator.

⁶ 2020 figures have not been included as this is an anomalous year due to the Covid-19 pandemic.

Hazardous waste exports from Wandsworth to Medway (tonnes)

WPA	Description	Source	2015	2016	2017	2018	2019
Medway	Mainly Healthcare	HWDI	859	1,524	1,495	1,363	1,352
	Rochester Clinical Waste Treatment Facility	WDI	772	1,435	1,417	1,429	665
	Eco-oil Ltd	WDI	1	0	0	-	-
	Kingsnorth Oil	WDI	25	0	0	-	61

Source: Hazardous Waste Data Interrogator and Waste Data Interrogator 2015-2019

Both parties agree that there are no known planning reasons why exports of waste of similar amounts of waste to those reported in the above table cannot continue.

Both parties note that strategic levels of non-hazardous waste are exported from London to Medway under the WDI origin category of 'London'. These waste exports cannot be accounted for at a Borough level to inform duty to co-operate engagement. The London Waste Planning Forum, along with partners East of England Waste Technical Advisory Board and the South East Waste Planning Advisory Group, are working to resolve this issue through engagement with the Environment Agency to remove these categories from the WDI. Wandsworth, through the LWPF, will keep Medway informed of progress on this matter.

Both parties note that Chatham Dockyard, including waste management facilities, may be allocated for redevelopment in the forthcoming Medway Local Plan. This facility receives around 6,000 tonnes of waste a year with the WDI origin of 'London' and therefore may include waste from Wandsworth. Once plans for this site are known, Medway will engage again with Wandsworth on this matter.

4. Governance arrangements

Both parties agree to monitor waste movements through Authority Monitoring Reports and engage again if movements change significantly from those to which this SoCG relates.

Both parties agree to engage again if there are any significant operational changes to facilities receiving waste exports from Wandsworth.

5. Signatories

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed:

Name: Jenifer Jackson

Position: Assistant Director for Environment
and Community Services (Planning and
Transport)

London Borough of Wandsworth

Signed:

Name:

Position:

Medway Council

Statement of Common Ground between London Borough of Wandsworth and Old Oak Common & Park Royal Development Corporation covering strategic waste matters

1. Parties involved

- London Borough of Wandsworth
- Old Oak Common and Park Royal Development Corporation (OPDC)

2. Strategic geography

London Borough of Wandsworth

LB Wandsworth is an inner London borough of around 35km² with a northern boundary on the River Thames between Nine Elms and Putney. Centred around Wandsworth Town and the Wandle Valley, the borough includes within it the town centres at Tooting, Balham, Clapham Junction, Wandsworth and Putney and the commons at Clapham, Tooting, Wandsworth and Putney / Wimbledon. It shares significant boundaries with adjacent boroughs – Lambeth to the east (10km boundary), Merton to the south (10km) and Richmond the west (8km). A relatively short boundary (c. 600m) exists with the Royal Borough of Kingston-upon-Thames in the south-west of the borough at Putney Vale. Across the River Thames, Wandsworth shares a boundary with Hammersmith and Fulham (Putney to Battersea), Kensington and Chelsea (Battersea to Chelsea Bridge) and Westminster (Chelsea Bridge to Nine Elms). Eight bridges link the south to the north bank.

OPDC

The Old Oak and Park Royal Development Corporation (OPDC) is a Mayoral Development Corporation and local waste planning authority for parts of the Boroughs of Brent, Ealing and Hammersmith & Fulham.

3. Strategic waste issues

Wandsworth is planning for net self-sufficiency for Local Authority Collected Waste (LACW), Commercial & Industrial waste (C&I) and Construction & Demolition waste C&D) and a target of 95% beneficial use of excavation waste.

Both parties agree the following thresholds to indicate 'strategic' waste movements:

- LACW / C&I – more than **5,000 tonnes** per annum
- Hazardous waste - more than **100t** per annum
- CD&E waste - more than **10,000t** inert per annum

Both parties agree the figures generated by the Waste Data Interrogator for 2015-2019⁷.

Applying these thresholds to the data below, the OPDC area hasn't received strategic amounts of construction demolition and excavation (CD&E) waste exports from Wandsworth since 2016.

Wandsworth exports to OPDC (Ealing) (tonnes)

Site name	Site type	Waste	2015	2016	2017	2018	2019
Willesden Freight Terminal	Transfer	CDE	100,663	63,400	1,172	102	0
Total	All	CDE	100,663	63,400	1,172	102	0
Total	All	HIC	0	0	0	0	0

Source: Waste Data Interrogator 2015-2019

OPDC has confirmed that the 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 has 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.

Both parties agree that there have been no recent exports from Wandsworth to Willesden Freight Terminal and that the market has found alternative transfer facilities for Wandsworth's CD&E waste.

4. Governance arrangements

Both parties agree to monitor waste movements through Authority Monitoring Reports and engage again, through the Duty to Co-operate if there are any significant changes to the above.

5. Signatories

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

⁷ 2020 figures have not been included as this is an anomalous year due to the Covid-19 pandemic.



Signed:

Name: Jenifer Jackson

Position: Assistant Director, Environment
and Community Services (Planning and
Transport Strategy)

London Borough of Wandsworth



Signed:

Name: Emma Williamson

Position: Director of Planning

OPDC

Statement of Common Ground between London Borough of Wandsworth and Surrey County Council covering strategic waste matters

1. Parties involved

- London Borough of Wandsworth
- Surrey County Council

2. Strategic geography

London Borough of Wandsworth

LB Wandsworth is an inner London borough of around 35km² with a northern boundary on the River Thames between Nine Elms and Putney. Centred around Wandsworth Town and the Wandle Valley, the borough includes within it the town centres at Tooting, Balham, Clapham Junction, Wandsworth and Putney and the commons at Clapham, Tooting, Wandsworth, and Putney / Wimbledon. It shares significant boundaries with adjacent boroughs – Lambeth to the east (10km boundary), Merton to the south (10km) and Richmond the west (8km). A relatively short boundary (c. 600m) exists with the Royal Borough of Kingston-upon-Thames in the south-west of the borough at Putney Vale. Across the River Thames, Wandsworth shares a boundary with Hammersmith and Fulham (Putney to Battersea), Kensington and Chelsea (Battersea to Chelsea Bridge) and Westminster (Chelsea Bridge to Nine Elms). Eight bridges link the south to the north bank.

Surrey County Council

The county of Surrey is located immediately to the south and west of Greater London. Major A roads and motorways run between the two areas. 73% of Surrey is included within the Metropolitan Green Belt.

3. Strategic waste issues

Wandsworth is planning for net self-sufficiency for Local Authority Collected Waste (LACW), Commercial & Industrial waste (C&I) and Construction & Demolition waste C&D) and a target of 95% beneficial use of excavation waste.

Both parties agree the following thresholds to indicate 'strategic' waste movements:

- 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

Surrey receives strategic amounts of waste exports from Wandsworth.

Both parties agree the following figures from the Waste Data Interrogator⁸.

Wandsworth exports to Surrey (tonnes)

Site name	Site type	Waste	2016	2017	2018	2019	2020
Addlestone Quarry	Landfill	CDE	30,866	12,528	0	0	0
Hithermoor Recycling and Recovery Facility	Treatment	CDE	3,722	0	0	0	0
Home Farm Extension Landfill Site	Landfill	CDE	5,899	0	0	0	0
Land At Cranleigh Brick & Tile Co Ltd	On/In Land	CDE	0	4,533	23,870	1,698	1,348
Redhill Landfill (NEQ)	Landfill	CDE	20,992	35,666	879	0	0
Stanwell 111 Aggregate Recycling Facility	Treatment	CDE	20,318	4,572	18,950	36,252	40,147
Stanwell III Landfill	Landfill	CDE	0	1,476	0	0	0
Total	All	CDE	82,896	60,602	44,092	40,766	41,937

Source: Waste Data Interrogator 2015-2019

Both parties agree the following figures from the Hazardous Waste Data Interrogator.

Hazardous waste exports from Wandsworth to Surrey (tonnes)

WPA	Description	Source	2015	2016	2017	2018	2019
Surrey	Mainly C&D Waste and Asbestos	HWDI	303	2,422	4,557	60	59
	Infinet House	WDI	0	9	1	0	-
	Redhill Landfill (North East Quadrant)	WDI	0	0	0	-	-

Source: Hazardous Waste Data Interrogator 2015-2019

Both parties agree that CD&E exports will not be able to continue to be exported to Addlestone Quarry in the long-term. Addlestone Quarry's current recycling permission expired at the end of 2020 but is currently continuing to operate under an existing planning application ([SCC Ref 2020/0166](#)) which is yet to be determined. However, both parties agree that there have been no recent exports from Wandsworth to Addlestone Quarry and that the market has found alternative facilities for Wandsworth's CD&E waste.

⁸ 2020 figures have not been included as this is an anomalous year due to the Covid-19 pandemic.

Stanwell 111 Aggregate Recycling Facility currently has permission until 2027. However, there is the potential for this capacity to be maintained beyond this date subject to an extension to the time limited planning permission.

Both parties agree that the destination of waste is largely dependent on market forces and exports will continue to go the most suitable facility. Therefore, it is not possible to identify a specific alternative landfill site or sites where Wandsworth's waste will go after the closure of Stanwell 111 Aggregate Recycling Facility. However, there is alternative available inert void space within Surrey which can accept similar levels of inert material as 'beneficial use' to help restore mineral sites in Surrey which can be relied upon in the short to medium term.

4. Governance arrangements

Both parties agree to monitor waste movements through Authority Monitoring Reports and engage again if these change significantly from the current trend.

Both parties agree to engage again if there are any significant operational changes to facilities receiving waste exports from Wandsworth.

5. Signatories

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.



Signed:

Name: Jenifer Jackson

Position: Assistant Director, Environment and Community Services (Planning and Transport Strategy)

London Borough of Wandsworth

Signed: 

Name: Caroline Smith

Position: Planning Group Manager

Surrey County Council

Statement of Common Ground between London Borough of Wandsworth and Thurrock Council covering strategic waste matters

1. Parties involved

- London Borough of Wandsworth
- Thurrock Council

2. Strategic geography

London Borough of Wandsworth

LB Wandsworth is an inner London borough of around 35km² with a northern boundary on the River Thames between Nine Elms and Putney. Centred around Wandsworth Town and the Wandle Valley, the borough includes within it the town centres at Tooting, Balham, Clapham Junction, Wandsworth and Putney and the commons at Clapham, Tooting, Wandsworth and Putney / Wimbledon. It shares significant boundaries with adjacent boroughs – Lambeth to the east (10km boundary), Merton to the south (10km) and Richmond the west (8km). A relatively short boundary (c. 600m) exists with the Royal Borough of Kingston-upon-Thames in the south-west of the borough at Putney Vale. Across the River Thames, Wandsworth shares a boundary with Hammersmith and Fulham (Putney to Battersea), Kensington and Chelsea (Battersea to Chelsea Bridge) and Westminster (Chelsea Bridge to Nine Elms). Eight bridges link the south to the north bank.

Thurrock Council

Thurrock is situated north of the Thames, twenty miles east of central London, in South Essex, and has a population of approximately 157,000. The Borough covers 165 sq km and has a diverse range of land uses and associated environmental issues. More than half of the land in Thurrock is designated Green Belt and it has over 18 miles of riverfront.

3. Strategic waste issues

Wandsworth is planning for net self-sufficiency for Local Authority Collected Waste (LACW), Commercial & Industrial waste (C&I) and Construction & Demolition waste (C&D) and a target of 95% beneficial use of excavation waste.

Both parties agree the following thresholds to indicate ‘strategic’ waste movements:

- 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

Thurrock receives strategic amounts of construction, demolition and excavation (CD&E) waste exports from Wandsworth.

Both parties agree the following figures from the Waste Data Interrogator⁹.

Wandsworth exports to Thurrock (tonnes)

Site name	Site type	Waste	2015	2016	2017	2018	2019
East Tilbury Quarry	Landfill	CDE	28,117	1,561	42,300	38,202	57,267
East Tilbury Quarry	Transfer	CDE	1,458	19,473	8,219	27,263	14,425
Berth 5, Port Of Tilbury London	Transfer	CDE	0	22,000	0	0	0
Ockendon Area II & III Landfill	Landfill	CDE	0	3,348	1,407	41	0
Land At North Tilbury	On/In Land	CDE	11,020	0	0	0	0
URM (UK) Limited	Treatment	CDE					21,520
Total	All	CDE	40,595	46,383	52,017	82,415	93,459
Total	All	HIC	36	79	313	1,198	2,989

Source: Waste Data Interrogator 2015-2019

Both parties agree that 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.

Both parties agree that East Tilbury Quarry closed and received last imports of material for restoration at the end of 2021. Therefore it is unlikely that Wandsworth's CD&E waste exports will be received at East Tilbury Quarry after this time.

Both parties agree that the destination of waste is largely dependent on market forces and exports will continue to go to the most suitable facility. Therefore it is not possible to identify a specific alternative landfill site or sites where Wandsworth's waste will go after the closure of Thurrock's landfill sites. Landfill void space in the wider south east represents sufficient opportunity for the market to find an alternative destination for similar amounts of waste currently exported from Wandsworth to landfill in Thurrock.

4. Governance arrangements

Both parties agree to monitor waste movements through Authority Monitoring Reports and engage again if these change significantly from the current trend.

Both parties agree to engage again if there are any significant operational changes to facilities receiving waste exports from Wandsworth.

⁹ 2020 figures have not been included as this is an anomalous year due to the Covid-19 pandemic.

5. Signatories

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

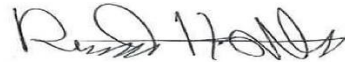


Signed:

Name: Jenifer Jackson

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Signed:

Name: Richard Hatter

Position: Strategic Planning Manager

Thurrock Council