- L BCroydon
- R B Kingston
- L B Merton
- L B Sutton

South London Waste Plan







Evidence Base Document
Statement of Cooperation (Part 1)

September 2020









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Contents:

1.	Introduction	4
2.	The London Context	4
3.	The Purposes of the Document	5
4.	Ongoing Cooperation	5
5.	Prescribed Bodies	6
6.	Waste Movements between Local Planning Authorities	7
7.	Next Steps	8

Figure 1: Waste Groupings within London

Table 1: Prescribed Bodies' Responses to the Issues and Preferred Options Document

Table 2: Responses to the South London Waste Plan Issues and Preferred Options Consultation from Relevant Local Authorities

1. Introduction

- 1.1 Under the Localism Act (2011), which amended the Planning and Compulsory Purchase Act (2004), and the Local Plan Regulations (SI2012/767), local planning authorities are required to cooperate with each other, and other bodies, when preparing plans, including waste plans.
- 1.2 The National Planning Policy Framework (2019) states that this cooperation should be on-going and that it is necessary to produce Statements of Common Ground to show that a plan is deliverable. The Planning Practice Guidance does not state which bodies a local planning authority should cooperate with in any given circumstance and how detailed this cooperation should be. Instead, it states that "all parties should approach the duty in a proportional way, tailoring cooperation according to where they can maximise the effectiveness of plans." It adds: "The level of cooperation is expected to be proportionate to the task and should not unduly delay the plan review.
- 1.3 Therefore, the Councils have had to make some judgements about how they carry out the Duty to Cooperate as there are no prescriptive guidelines or regulations to follow.

2. The London Context

- As London has a strategic tier of governance in terms of planning, the way London Boroughs operate the Duty to Cooperate is further complicated as the strategic decisions have largely already been taken in the London Plan. Additionally, cooperation with other London Boroughs is not so important on waste issues as the principal waste movements are usually between the South London boroughs and the county councils and unitary authorities of the South East.
- 2.2 Most London boroughs have formed waste planning groupings, of varying strengths ranging from pooling apportionments as the South London Waste Plan boroughs do to a loose arrangement where boroughs deal with their own London Plan apportionment but work together on matters of common interest, such as the South East London Boroughs Waste Planning Group. Figure 1 shows the waste planning groupings within London.
- 2.3 It should be stressed that the first and most important Duty to Cooperate action that the four boroughs have undertaken has been agree to pool their apportionments and to work together to produce a South London Waste Plan.

North London Waste Old Oak & Park Royal Development Corp Plan boroughs London Legacy Development Corp West London Waste Enfield East London Waste Plan boroughs Harrov Waltha Barking & Dagenhar Tower Hamlets Richmond upon South East London Western Riverside Waste Planning Group Waste Planning Group South London Waste Plan boroughs

Figure 1: Waste Groupings within London

3. The Purposes of this Document

- The purposes of this document, which was written following the South London Waste Plan Issues and Preferred Options document, are:
 - To take stock of the relationships between the South London Waste Plan boroughs and the Mayor of London and other local planning authorities; and,
 - To identify where there needs to be further work between the Councils and other local planning authorities so that the Councils can direct their attentions to the relationships that need most cooperation and so that the Councils carry out the Duty to Cooperate in the most effective and proportionate way.

4. <u>Ongoing Cooperation</u>

- The Councils have a long tradition of working together and working with other local planning authorities. In 2012, they adopted the first South London Waste Plan together and they have been long-standing members of the London Waste Planning Forum (formerly the London Regional Technical Advisory Board), which is a meeting involving London boroughs, local planning authorities, waste operators and other representatives from those involved in waste planning and the waste industry.
- The Councils send representatives to meetings, when the agenda is relevant, but for every meeting the Councils receive agenda, papers and minutes from the London Waste Planning Forum and so are up-to-date with the latest information regarding waste planning both from within London and around it.

4.3 The Councils are also in regular contact with many of the Prescribed Bodies for the Duty to Cooperate on a variety of planning matters within their respective boroughs and so the Prescribed Bodies will be aware of issues, which touch on waste planning, even if they have not had detailed discussions on waste planning until this South London Waste Plan began to be prepared.

5. Prescribed Bodies

There are two sets of bodies which the Councils are statutorily required to cooperate with: the (i) Prescribed Bodies and (ii) Local Planning Authorities. For the South London Waste Plan Issues and Preferred Options consultation, the Councils considered the roles of the Prescribed Bodies within London and contacted all of the relevant Prescribed Bodies for the comments. Table 1 sets out the Prescribed Bodies, their role within the London context and whether they replied.

Table 1: Prescribed Bodies Responses to the Issues and Preferred Options Consultation

Consultation		
Mentioned in the Act	London Context	Response
The Environment Agency	The Environment Agency	Replied.
		Some issues identified
Historic Buildings and	Historic England	Replied.
Monuments Commission for		No significant issues
England		identified
Natural England	Natural England	Replied.
		No issues identified.
The Mayor of London	The Mayor of London	Replied
		Some issues identified
The Civil Aviation Authority	The Civil Aviation Authority	No reply.
,	,	Not relevant to a waste
		plan
The Homes and	The Mayor of London	See Mayor of London
Communities Agency		coomayor or condon
Primary Care Trusts	Croydon CCG	No reply.
	Kingston CCG	However, a response
	Merton CCG	from NHS England
	Sutton CCG	inom in io England
Office of Rail and Road	Office of Rail Regulation	No reply. Issue
		regarding railheads dealt
		with via landowner
Transport for London	Transport for London	Replied.
	Transport for Zonaon	No significant issues
		identified
Highways Authority	Highways Authority	Replied.
		No issues identified
Marine Management Agency	-	Not relevant.
		The MMA has
		jurisdiction to
		Teddington, the tidal
		reach of the Thames.
		However none of the
		proposed sites in
		Kingston are near the
		Thames
Local Enterprise Partnership	The Mayor of London	See Mayor of London
	1 wayor or condon	200 Mayor of London

Coast and Capital Local Enterprise Partnership	-	No reply. Notified through Croydon's consultation
		database
Local Nature Partnership	The Mayor of London	See Mayor of London

- The representations and the officer responses to the representations are available in the Representation Schedule on the South London Waste Plan Issues and Preferred Options document.
- 6. Waste Movements between Local Planning Authorities
- Prior to the South London Waste Plan Issues and Preferred Options
 Consultation, the Councils employed the consultants Anthesis to study relevant
 aspects of waste planning within South London. As part of the study, the
 consultants looked at waste movements to and from the South London Waste
 Plan area, using the Waste Data Interrogator and the hazardous Waste
 Interrogator.
- 6.2 Chapter 7 of the consultant's report set out the exports from and imports to the South London Waste Plan area, based on the analysis of waste movements between 2013 and 2017 and using the following thresholds:
 - 2,500 tonnes per annum for Household and Commercial and Industrial waste
 - 5,000 tonnes per annum for Construction and Demolition waste
 - 100 tonnes per annum for Hazardous Waste
- These thresholds have been chosen as they are used in the wider South East to indicate significant waste movements and were agreed at the South East Waste Planning Advisory Group meeting of 10 April 2014 and the East of England Waste Technical Advisory Board meeting of 3 April 2014.
- For the South London Waste Plan Issues and Preferred Options consultation, the Councils wrote to all those local planning authorities, where the waste movements exceeded the thresholds for the three streams of waste in any given year, asking:
 - Whether you consider the waste movements between the four South London boroughs and your authority are correct;
 - Are all of the sites listed in the attached table still operating in your authority area?
 - Are you aware of any planning reasons (or other reasons) why these waste movements cannot continue in the future?
 - Do you have any comments on the waste movements from the South London Waste Plan boroughs to your authority area?
- **6.5** The responses, and non-responses to this mail out are set out in Table 2.
- However, the Waste Data Interrogator is not totally comprehensive and some waste movements are classified as "uncodeable" within a region, such as "London" or "South London", which may include boroughs other than the South London Waste Plan boroughs. Unfortunately, these semi-defined waste movements are sizeable and therefore some assumptions have to be made about their origin or destination. The officer response to Kent County Council sets out the Councils' thoughts with regard to this uncodeable waste.

7. Next Steps

- 7.1 The Councils will endeavour to do the following:
 - Resolve issues regarding the Environment Agency's comments
 - Resolve issues regarding The Mayor of London's comments
 - Contact NHS England to find out more information on its requirements
 - Make contract with London boroughs who have not responded
 - Discuss the clinical waste issues with Central and East Berkshire
 - Ascertain more information on waste going to the Gerrard's Cross landfill
 - Ascertain more information on waste going to Kent
 - Conclude a Statement of Common Ground with Cambridgeshire and Peterborough
 - Conclude a Statement of Common Ground with Surrey County Council
 - Conclude a Statement of Common Ground with Essex County Council
 - Conclude a Statement of Common Ground with Slough Council

Table 2: Responses to the South London Waste Plan Issues and Preferred Options Document from Relevant Planning Authorities

Respondent	Waste Movements	Response	Officer Notes
Bexley, London	HCI from SLWPA	No response from the Issues and Preferred Options	Part of the South East
Borough of	Crayford MRF (2017) 20,873	Consultation	Waste Planning
	Hazardous from SLWPA		Group. Currently
	Healthcare Combustion (2017)		seeking to make
	70		contact.
	Other (2017) 57		
The Central and	Hazardous from SLWPA	Thank you for the Duty to Cooperate request which relates	Healthcare goes from
Eastern Berkshire	Healthcare transfer (2017) 152	to Bracknell Forest and the four boroughs. I should take	the SLWPA. This will
Authorities	Healthcare treatment (2017)	this opportunity to advise that Bracknell Forest Council	be investigated
 Bracknell 	638	along with Reading Borough Council, The Royal Borough of	further.
Forest Borough	Hazardous to SLWPA	Windsor & Maidenhead and Wokingham Borough Council	
Council,	Solvents (2017) 67	('The Central and Eastern Berkshire Authorities') are	
Reading	Oil and Oil Water (2017) 32	working in partnership to produce a Joint Minerals and	
Borough Council,	Other (2017) 14	Waste Plan which will guide minerals and waste decision	
 Royal Borough 		making in the Plan area up until 2036. The Joint Minerals	
of Windsor &		and Waste Plan will build upon the formerly adopted	
Maidenhead		minerals and waste plans for the Berkshire area, and	
Wokingham		improve, update and strengthen the policies and provide	
Borough Council		details of strategic sites that are proposed to deliver the	
		vision. The Joint Minerals and Waste Plan is being	
		prepared and developed by Hampshire Services, with whom	
		the Central and Eastern Berkshire Authorities are working in	
		collaboration.	
		The Joint Minerals and Waste Plan is currently at	
		Regulation 18 – Draft Plan stage. Further information on	
		the emerging Plan can be found by visiting	
		www.hants.gov.uk/berksconsult. I have tried to set out	
		below, as best possible, the answers to your questions.	
		Whether you consider the waste movements between the	
		four South London boroughs and your authority are correct	
		We would agree with the figures you have identified	

	T		
		Are all of the sites listed in the attached table still operating in your authority area? Question not applicable since the information supplied relates to exports from Bracknell Forest to the four boroughs, and the information supplied in the attached has come from the Hazardous Waste Data Interrogator, so it is not possible to ascertain the corresponding sites. Are you aware of any planning reasons (or other reasons) why these waste movements cannot continue in the future? As the information supplied in the attached has come from the Hazardous Waste Data Interrogator, it is not possible to ascertain the corresponding sites, therefore we cannot comment. However, the figures supplied relate to exports from Bracknell Forest to the four boroughs, so we would be grateful if you know which site(s) these movements relate to whether there is any reason why these movements cannot continue in the future Do you have any comments on the waste movements from the South London Waste Plan boroughs to your authority area?	
		Question not applicable since the waste movements identified relate to exports from Bracknell Forest to the four boroughs.	
Brighton and Hove City Council	C&D from SLWPA W Hove Golf Club (2017) 3,344 Other (2017) 134	Whether you consider the waste movements between the four South London boroughs and your authority are correct I have no evidence to suggest otherwise	There is a small C&D loss but the Councils intend to be net self-sufficient in terms of
		Are all of the sites listed in the attached table still operating in your authority area? 'West Hove Golf Club' is not a permanent waste management facility – there were imports of inert material	C&D.

		as part of a landscaping scheme to shield the golf course from the A27 which I believe have now ceased. Are you aware of any planning reasons (or other reasons) why these waste movements cannot continue in the future? No planning reasons, however as per answer to Q2, it is likely that the scheme has now completed. Do you have any comments on the waste movements from the South London Waste Plan boroughs to your authority area? No.	
Bristol City Council	HCI from SLWPA Estuary Park (2017) 3,751 Other (2017) 131	No response from the Issues and Preferred Options Consultation	No issues. Estuary Park appears the Viridor Resource Recovery Centre at Avonmouth and it is understood movements between Avonmouth, Colnbrook and Beddington are coordinated by Viridor
Bromley, London Borough of	C&D to SLWPA Other (2017) 1,454	No response from the Issues and Preferred Options Consultation	No issues, This is an import and the Councils know no reason why it cannot continue.
Buckinghamshire County Council	HCI from SLWPA Gerards Cross Landfill (2017) 30,413 Springfield Farm Landfill (2017) 4,938 Other (2017) 2	BCC are supportive of continuing with net self-sufficiency with the South London boroughs and commends the vision for the capital to increase level of self-sufficiency within the plan's borders. Please see below our responses to the questions detailed in the email.	The capacity sent to Gerrards Cross after 2021 is unaccounted for but the plan is intending an increase in C&D capacity.

C&D from SLWPA

Calvert Landfill (2017) 7,640 Gerrards Cross Landfill (2017) 5,133 Other (2017) 21 Do you consider the waste movements between the four South London boroughs and your authority are correct? BCC records show the figures of exports for Springfield and Calvert read correctly to the attached table. We have calculated that Gerrard's Cross landfill is receiving 115 tonnes less than the table. See below BCC's extraction from the WDI. However, due to the small amount in this difference we don't see this is a strategic issue to resolve. Facility WPA Site Name Basic Waste Cat Site Category Facility Type Recorded Origin Origin WPA Tonnes Received

Buckinghamshi Gerrards Hhold/Ind/Com Landfill Non Hazardous Merton Merton 6,311.28
Buckinghamshi Gerrards Hhold/Ind/Com Landfill Non Hazardous Merton Merton 3.38
Buckinghamshi Gerrards Hhold/Ind/Com Landfill Non Hazardous Merton Merton 23,965.42
Buckinghamshi Gerrards Hhold/Ind/Com Landfill Non Hazardous Kingston Upon Kingston 17.94
TOTAL: 30,298.02

Are all of the sites listed in the attached table still operating in your authority area?
Yes

Are you aware of any planning reasons (or other reasons) why these waste movements cannot continue in the future? Veolia ES Landfill Limited operators of Gerrards Cross Landfill site have recently gained permission to vary the sites conditions to extend the life of the site until 31st December 2021. This means that the site will not be accepting waste after 2021.

		Do you have any comments on the waste movements from the South London Waste Plan boroughs to your authority area? None	
Cambridgeshire County Council and Peterborough City Council	Hazardous from SLWPA Landfill - Asbestos (2017) 630 Recovery – Asbestos (2017) 194 Other (2017) 93	Do you consider the waste movements between the four South London boroughs and your authority are correct? Data is drawn from the Environment Agency's WDI. The Councils have no alternative source of data, but are aware that occasional errors occur in the WDI databases. Are all of the sites listed in the attached table still operating in your authority area? There are no sites listed in the Cambridgeshire and Peterborough area, so no comment can be made. The primary hazardous landfill site in this area is located at Thornhaugh near Peterborough. This site has planning permission until 2034. However, without further information to confirm if it is this site which is receiving waste from the London South area, it is not possible to confirm that such waste flows can continue during your Plan period. Are all of the sites listed in the attached table still operating in your authority area? In reference to recovery / other, again no facilities are identified, and without this it is difficult to comment further. However, Cambridgeshire does have a specialist facility which deals with waste oils / liquids, and draws waste from a wide area. If waste is being taken to this facility (known as Malory Oils / M2 Environmental), then this is a safeguarded site and there is no reason to assume such waste flows will not continue.	No issues, Given the movement is for asbestos, we assume the destination is Thornhaugh. Since Thornhaugh is open to 2034, we see no reason why this movement cannot continue.

		Do you have any comments on the waste movements from the South London Waste Plan boroughs to your authority area? The hazardous waste flows are above the thresholds set by the East of England WTAB as being strategic. It is noted that your Authority will be in touch in due course regarding a Statement of Common Ground.	
Cheshire West and Chester	Hazardous from SLWPA Other (2017) 200	Do you consider the waste movements between the four South London boroughs and your authority are correct? The waste movements identified between the four south London boroughs and Cheshire West and Chester are correct.	Cheshire West and Chester has been unable to confirm this movement but has no concerns regarding this movement.
		Are all of the sites listed in the attached table still operating in your authority area? No sites are listed in the table in relation to Cheshire West and Chester – so I am unable to check if they are still operating. However, I am not aware of the recent closure of any hazardous waste sites in the borough.	
		Are all of the sites listed in the attached table still operating in your authority area? I am not aware of any planning reasons, or other reasons why these movements of hazardous waste cannot continue in the future.	
		Do you have any comments on the waste movements from the South London Waste Plan boroughs to your authority area? Generally we consider significant waste movements to be over 500 tonnes for hazardous waste. As the identified movements between our authorities were 200 tonnes in 2017, this is not considered to be significant from our perspective.	

City of London C&D to SLWPA Transfer to 77 Weir Road (2017) 13,309 Other (2017) 843	I have one minor comment on the Issues and Preferred Options report. Figure 6 refers to 'Cheshire West & ?' — rather than Cheshire West and Chester and also refers to 'Windsor &'. As the Issues and Preferred Options document identifies that the four borough's forecast arisings will be managed within existing sites and the sites are safeguarded, we have no further comments on the document. I understand that no provision will be made for hazardous waste arisings as they are small and are already managed by suitable, specialist waste management facilities. This seems a sensible approach and we do not have any issues with this from a Cheshire West and Chester perspective, unless the amount of hazardous waste is likely to increase significantly in the future or the movements to Cheshire West and Chester increase above 500 tonnes per annum. Do you consider the waste movements between the four South London boroughs and your authority are correct? The City Corporation considers that the identified waste movements between the four South London boroughs and the City Corporation are correct. Are all of the sites listed in the attached table still operating in your authority area? Merton is the only borough within the South London Waste Plan boroughs that has strategic waste movements with the City of London and we consider the figures relating to the City in Table 4: Apportioned (Household and commercial and industrial) Waste to be correct.	No issues. This is a movement to NJB Recycling (safeguarded site M12) so there is no reason why this movement cannot continue
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Derbyshire	Hazardous from SLWPA	Do you have any comments on the waste movements from the South London Waste Plan boroughs to your authority area? The City Corporation is not aware of any planning (or other) reasons why the waste movements between Merton and the City of London cannot continue in the future. Do you have any comments on the waste movements from the South London Waste Plan boroughs to your authority area? The City Corporation do not have any further comments on the waste movements between the South London Waste Plan boroughs and the City of London. We have checked the entries in the 2017 Waste Data	The movements are
County Council	Other (2017) 699	Interrogator and have been unable to find an entry for 699t of hazardous waste being transferred between the Authorities. There appears to internal inconsistencies in the WDI in that there is an entry for 1,116t of hazardous waste (batteries and accumulators) being removed from Merton to Derbyshire but only 9t is registered as being received in Derbyshire from 'South London'. If you are able to provide further details of the waste movements that you believe occurred we may be able to give further information regarding the availability of facilities to treat future movements of waste.	unclear.
East London Boroughs	Hazardous from SLWPA Oil & Oil Mixes – Treatment (2017) 82 Asbestos – Recovery (2017) 1,168 Other (2017) - 350	No response for the Issues and Preferred Options Consultation	No response. Currently seeking to make contact.

East Sussex County Council	Hazardous from SLWPA Municipal & Commercial (2017) 473 Other (2017) 46 HCI to SLWPA Mitcham Transfer (2017) 7,629 Other (2017) 7	I can confirm that East Sussex County Council in its role as Minerals and Waste Planning Authority has no comments on the above plan. Additionally, please find the answers to you additional questions below: **Do you consider the waste movements between the four South London boroughs and your authority are correct?* I have reviewed the Environment Agency's Waste Data Interrogators and Hazardous Waste Data Interrogators for the years 2013 – 2017. I can confirm that the information in the tables provided is broadly correct, save for one significant omission, which is that between 2014 and 2015 the Northall Clay Pigeon Club received 29,651 tonnes of Inert / C+D waste. However, it is my understanding this was a temporary development which has now concluded. **Are all of the sites listed in the attached table still operating in your authority area?** The table did not identify any sites within East Sussex as receiving waste. **Are you aware of any planning reasons (or other reasons) why these waste movements cannot continue in the future?** N/A **Do you have any comments on the waste movements from the South London Waste Plan boroughs to your authority area?** I have no further comments	No issues. Since the Northall Clay Pigeon club movement occurred between 2014 and 2015, it is assumed that the waste has found an alternative destination.
Essex County Council	Hazardous from SLWPA Asbestos (2017) 254 Other (2017) 49 HCI to SLWPA Other (2017) 98	[Essex County Council made comments on the document and so have been included in the Representations Schedule rather than cross-border movements]	Essex County Council has not made any comments on movements

Greenwich,	C&D from SLWPA	No response from the Issues and Preferred Options	Part of the South East
London Borough of	Victoria Deep Water Terminal (2017) 20,932 Other (2017) 6,178	consultation	Waste Planning Group
	Hazardous from SLWPA Oil & Oil Mixes (2017) 343 Other (2017) 70		
Hackney, London Borough of	C&D to SLWPA Other (2017) 0	No response from the Issues and Preferred Options consultation	See North London Waste Plan Response
Hammersmith & Fulham, London Borough of	Hazardous from SLWPA Municipal & Commercial Recovery (2017) 669 Municipal & Commercial Transfer (2017) 195 Other (2017) 1 C&D to SLWPA Waste Transfer & Recovery (2017) 2,780	No response from the Issues and Preferred Options consultation	Part of the Western Riverside Waste Authority. Currently seeking to make contact.
 Hampshire County Council, Portsmouth City Council Southampton City Council 	HCI from SLWPA Budds Farm (2017) 2,559 Sims Group (2017) 3,878 Other (2018) 587 Hazardous from SLWPA Other (2017) 153 Hazardous to SLWPA Packaging (2017) 13 Other (2017) 24	Firstly, I should mention as well as submitting a response for ourselves (as Hampshire County Council), we tend to respond to Duty to Cooperate requests on behalf of two of our five partners; Portsmouth City Council and Southampton City Council. Therefore, when reviewing the information you have sent through, I have also included in my WDI searches these two additional minerals and waste planning authorities. However, in this instance, I do not think there have been any additional movements which would alter the figures you have supplied but I thought I should draw this to your attention for future reference should you submit further DtC correspondence to us. I have tried to set out below, as best possible, the answers to your questions	No issues. Hants, Portsmouth and Southampton believe there is capacity for this movement to continue.

Havering, London Borough of	HCI from SLWPA Rainham MRF (2017) 18,047 Other (2017) 97	Are you aware of any planning reasons (or other reasons) why these waste movements cannot continue in the future? No, we are not currently aware of any planning reasons why these waste movements would not be able to continue in the future, at this point in time. Do you have any comments on the waste movements from the South London Waste Plan boroughs to your authority area? We would agree with the thresholds you have identified in order to decipher whether a waste movement is strategic or not. Hampshire (including Portsmouth and Southampton) adhere to the thresholds set by SEWPAG (South East Waste Planning Advisory Group) which are 5,000 tpa inert, 2,500 tpa non-hazardous waste and 100 tpa hazardous waste. We would use the main WDI for inert and non-hazardous waste figures and the HWDI for hazardous waste figures, which I think what you have done too. No response from the Issues and Preferred Options consultation	Part of the East London Waste Plan boroughs.

	C&D from SLWPA Rainham Landfill (2017) 2,350 Other (2017) 2,550		N
Hertfordshire County Council	Hazardous from SLWPA Oil & Oil Mixes Transfer (2017) 63 Oil & Oil Mixes Treatment (2017) 211 Other (2017) 218	No response from the Issues and Preferred Options consultation	No comment
Hillingdon, London Borough	See West London	Please see the following Officer comments:	Part of the West London Waste Plan
of		The 2018 iteration of the Environment Agency Waste Data Interrogator is now available for public use.	grouping and was understood to be the lead borough for the
		It is not overtly clear from the table provided what waste movements exist between the four South London boroughs and the London Borough of Hillingdon. Presumably these relate to the Hazardous Waste Movements to West London Boroughs identified in Table 3? Without a list of these sites however it is not possible to determine if they are still operating or if there were any planning reasons that would prevent their operation in the future. If you would like to break these movements down by site then I would be happy to respond accordingly.	grouping. Currently seeking to make contact.
Kensington & Chelsea, London	C&D to SLWPA Waste Transfer & Recovery	No response from the Issues and Preferred options consultation	Part of the Western Riverside Waste
Borough of	(2017) 11,551		Authority. Currently seeking to make contact.
Kent County Council	HCI from SLWPA Other (2017) 5,596 C&D from SLWPA Borough Green Landfill (2017) 3,744 Other (2017) 763	We note that the South London Waste Plan boroughs have identified cross-boundary waste movements in excess of the following thresholds in total as strategic for the purposes of exercising the Duty to Co-operate: * Household and Commercial and Industrial Waste 2,500tpa	The Councils also have problems with the origin and fate of non-codeable waste. However, we would be surprised if much

Hazardous from SLWPA

Healthcare Incineration (2017) 194

Asbestos Landfill (2017) 115 Oil & Oil Mixes Recovery (2017) 349

Municipal & Commercial Recovery (2017) 1,576 Healthcare Recovery (2017) 96 Oil & Oil Mixes Transfer (2017) 293

Healthcare Transfer (2017) 96 Oil & Oil Mixes Transfer (2017) 688

Other (2017) 303

HCI to SLWPA

Pear Tree Farm (2017) 17,040 Mitcham Transfer (2017) 8,690 Mitcham Waste Centre (2017) 2,604

Others (2017) 1,295

Hazardous to SLWPA

Packaging (2017) 29 Not specified (2017) 37 Oil & Oil Mixes (2017) 26 Other (2017) 34

- * Construction, Demolition and Excavation (Inert) Waste 5,000tpa
- * Hazardous Waste 100tpa

We also note that you are not seeking to enter into Statements of Common Ground at this stage in the development of the Plan.

We have reviewed the tables setting out data from the 2017 Environment Agency Waste Data Interrogator relating to exports and imports of wastes above the thresholds and respond to your questions as follows:

Does KCC consider the data relating to waste movements between the four South London boroughs and Kent are correct?

It seems that the datasets have ignored waste movements not directly attributable to each Borough. and yet the 2017 WDI records a significant tonnage of waste (287,237t) travelling to Kent attributed to South London. While not all of this may come from the four Boroughs signed up to the South London Plan, it is reasonable to consider a significant proportion of it does arise within the Plan area. When these input are factored in,

the following sites figure significantly in meeting South London management needs:

- Stone Pit 2 Inert Landfill 174,521 tonnes inc 152kt soils, 21kt of processing residues & v c1.5kt hardcore from S London.
- Stone Pit 1 (Recovery to Land) 77,367t consisting solely of soils from S London.
- Plot 15 Manor Business Park -22,903t mixed skip waste from S London.
- Ridham Dock Wood Facility 7,941t inc 5.770 t from S London

of the waste attributed to "South London" was from the South London Waste Plan Area. The total forecast arisings were 1,121,312 tonnes in 2017. The total managed was 626.196 tonnes in the South London Waste Plan area in 2017, a further 308.661 tonnes in 2017 was sent to the landfill site at Beddington in Sutton and a further 533.914 was sent to identified facilities outside the area. It seems strange therefore that 287,237 tonnes would go to Kent from the South London Waste Plan area when so much is accounted for and the area currently has a landfill site accepting waste. Given this fact, the Councils consider that they do not need to rely on Kent landfills for capacity although the capacity

Are all of the sites listed in the attached table still operating in Kent area?

Only one site, Borough Green Landfill is actually named against Kent in the listing provided. I can confirm this is still operating as of the date of this response. I also confirm that all the additional sites listed above, are currently operating save for Stone Pit 2 which no longer benefits from planning consent for the deposit of waste materials. It is currently the subject of a planning application to Dartford Borough Council for earthworks, including the importation of additional inert fill, to create a revised restoration level/development platform for the forthcoming residential led development.

that Kent has provided for London is welcome. As regards, healthcare waste, the council is considering promoting a site for this in the next iteration of the plan.

Are you aware of any planning reasons (or other reasons) why these waste movements cannot continue in the future? Capacity at Stone Pits 1 & 2 is finite so cannot be relied upon for the waste from S London shown as having travelled there in 2017. However, given that KCC has made provision for the receipt of c 300ktpa of inert waste from London in its adopted Plan, alternative management provision within Kent should not be problematic for the term of our Plan at least i.e. to 2030.

Do you have any comments on the waste movements from the South London Waste Plan boroughs to your authority area?

We note that when considering the data in the 2017 Hazardous Waste Interrogator it indicates slightly different tonnages of hazardous waste from the S London Boroughs travels to Kent waste management facilities in 2017 as compared with the data provided. While individual facilities are not specifically identified in the HWI it is

		possible in most instances to cross check with the WDI and	
	000 (01 W/04	infer the identity of the receiving site.	D (())) (
Lambeth, London Borough of	C&D to SLWPA Transfer & Recovery (2017) 3,020 Other (2017) 310	We have no detailed comments on the Issues and Preferred Options document, but support the approach to plan to meet the area's apportionment targets and plan for all seven waste streams. My comments to your specific questions are set out below.	Part of the Western Riverside Waste Authority. No issues identified
		Whether you consider the waste movements between the four South London boroughs and your authority are correct? Yes, we consider the waste movements from Lambeth to South London correct. The waste which receives Lambeth's waste is Reston Waste Transfer and Recovery Facility in Merton.	Riverside Waste Authority. No issues
		Are all of the sites listed in the attached table still operating in your authority area? N/A. There are no significant movements of waste from South London to Lambeth.	
		Are you aware of any planning reasons (or other reasons) why these waste movements cannot continue in the future? N/A	
		Do you have any comments on the waste movements from the South London Waste Plan boroughs to your authority area? Lambeth recently signed a Statement of Common Ground with the South London Boroughs, represented by Merton, on movements of waste between our area. The SoCG demonstrates co-operation and engagement between our areas on strategic cross-boundary waste matters, and will	
		support Lambeth's Reg 19 Local Plan Review which will be out for consultation in early 2020.	

County Council Other (2017) 188 Consultation.	ast
Consultation	ast
Of Other (2017) 2,046 Medway WPA Hazardous from SLWPA Oil & Oil Mixes Transfer (2017) 703 Healthcare Treatment (2017) 19 Other (2017) 97 Milton Keynes WPA No response from the Issues and Preferred Options consultation. No comment No comment No comment No response from the Issues and Preferred Options consultation. No response from the Issues and Preferred Options C&D from SLWPA Bletchley Landfill (2017) 12,557 Northamptonshire County Council Hazardous from SLWPA Asbestos (2017) 1 Other (2017) 14 No response from the Issues and Preferred Options consultation. No comment No comment No issues, The 20 identified waste movements between Northamptonshire and The London Boroughs of Croydon, Kingston, Merton and No issues, The 20 movements are sn and the facility is	
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Other (2017) 14 The London Boroughs of Croydon, Kingston, Merton and and the facility is	7
	all
Sutton. operational to 202	
The County Council considers that the only strategic (and	
therefore potentially DtC) matters relating to waste	
movements from South London into Northamptonshire are	
those relating to hazardous waste and radioactive waste	
and in essence concern the long term future of the East	
Northants Resource Management Facility in north-east	
Northamptonshire that currently accepts such waste. As the	
enclosed table shows, the facility does take hazardous	
waste from South London and there is the potential for it to	
take radioactive waste in future. However, permission for	
this site is only to 2026 and there is uncertainty about it	
continuing beyond this date. Therefore you should work on	
the basis that this facility can only be assumed to operate	
until 2026.	

North London Waste Plan Boroughs (Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest)		Unless future monitoring evidence suggests significant changes in the future pattern of waste movements between our respective authorities, we are satisfied that South London have taken appropriate steps in terms of the duty to cooperate and we do not wish to raise any strategic planning issues. I am writing on behalf of the London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest (the "North London Boroughs") who are working together to prepare the North London Waste Plan (NLWP). Thank you for your email of 31st October 2019 inviting comments on the Issues and Preferred Options document and on the exports and imports document under the duty to co-operate. Turning first to the duty to co-operate, it is clear from the exports and imports document that only very limited documented amounts of waste have moved between the North and South London waste plan areas in the last five years and that therefore no significant issues arise.	No issues
Nottinghamshire County Council	Hazardous from SLWPA Oil & Oil Mixes Recovery (2017) 323	No response from the Issues and Preferred Options consultation	No comment
Oxfordshire County Council	C&D from SLWPA Sutton Courtenay Landfill (2017) 9,777 Hazardous from SLWPA Other (2017) 112	No response from the Issues and Preferred Options consultation	No comment
Rotherham WPA	Hazardous from SLWPA Other (2017) 54	Whether you consider the waste movements between the four South London boroughs and your authority are correct? I am not aware of any data available to confirm the waste movements identified in the tables, nor any alternative information or data.	No issues

Are all of the sites listed in the attached table still operating in your authority area?

No specific sites identified for Rotherham.

Are you aware of any planning reasons (or other reasons) why these waste movements cannot continue in the future? Whilst recognising that site-specific comments are not possible based on the data provided, I am not aware of any planning reasons why the broad level of movements identified could not continue in the future.

Do you have any comments on the waste movements from the South London Waste Plan boroughs to your authority area?

I would note that the adopted Barnsley, Doncaster and Rotherham Joint Waste Plan, provides the framework to guide and assess new waste management proposals up until 2026. This is available to view here:

https://www.rotherham.gov.uk/downloads/download/41/jointwaste-plan-documentation

Paragraph 2.26 of the Joint Waste Plan notes that cross boundary movements are likely to decrease over the course of the plan period so long as neighbouring authorities are successful in their intentions to manage their waste within their own boundaries. Policy WCS1 (3) indicates that "Proposals will be supported which enable Barnsley, Doncaster and Rotherham's waste to be managed locally, whilst allowing waste to be imported or exported where this represents the most sustainable option." Therefore the Council would be supportive of measures to manage waste movements closer to their origins, minimising cross boundary waste movements wherever this provides the most sustainable option.

Sefton WPA and	Hazardous from SLWPA	I am responding to your emails sent 31st October 2019 to	No issues
Wirral WPA	Other (2017) 219	Sefton Council and Wirral Council regarding the South	
	,	London Waste Local Plan Issues and Preferred Options	
		consultation. Sefton and Wirral alongside Halton, Knowsley,	
		Liverpool and St Helens Councils adopted the Merseyside	
		and Halton Joint Waste Local Plan (WLP) on 18th July	
		2013. This document provides a waste strategy and policy	
		framework for the Plan Area. For more information visit our	
		website: http://www.meas.org.uk/1093 Merseyside	
		Environmental Advisory Service (MEAS) coordinated	
		preparation of the WLP and provide waste planning advice	
		to the Merseyside and Halton Councils, so we have been	
		asked to prepare a joint response to your Duty to Co-	
		operate request. Our comments on your questions are	
		informed by Environment Agency (EA) data sources and	
		consider both waste sent (removed) and received from	
		South London.	
		Whether you consider the waste movements between the	
		four South London boroughs and your authority are correct?	
		The movement of waste to Sefton is correct and have been	
		clarified through both the Waste Data Interrogator and	
		Hazardous Waste Interrogator. I cannot identify the	
		movements of hazardous waste to Wirral on either of these	
		sources. There are smaller (non-strategic) quantities of	
		waste being exported from South London to Knowsley,	
		Halton, St Helens and Wirral but these are not considered to	
		be significant quantities. Movements of this scale are not	
		likely to raise any planning or waste capacity issues.	
		Therefore, unless waste movements increase significantly	
		on 2017 levels no further action is needed.	
		There are more significant movements of waste from South	
		London to a couple of sites in Liverpool (Olleco and	
		S.Norton & Co Ltd.), however, these movements do fall a	

Sheffield City Council	Hazardous from SLWPA Other (2017) 41	by administrative boundaries. No response from the Issues and Preferred Options consultation	No response
		Do you have any comments on the waste movements from the South London Waste Plan boroughs to your authority area? The Joint Waste Local Plan takes account of cross boundary movement of all waste streams, but in particular for hazardous waste where it is acknowledged that many of the specialised facilities are of regional and national significance and waste industry operations are not confined	
		Are you aware of any planning reasons (or other reasons) why these waste movements cannot continue in the future? No. To our knowledge, there are no planning reasons why similar waste movements to those that occurred in 2017 cannot continue to happen in the future. The WLP safeguards all existing built waste management facilities under policy WM7 Protecting Existing Waste Management Capacity for Built Facilities and Landfill in order to maintain essential waste management capacity against changes of use. This capacity is protected for the needs of the Plan Area but also takes account of waste arisings and capacity outside of the sub-region through the WLP needs assessment.	
		little below the strategic cross boundary movements of waste. Are all of the sites listed in the attached table still operating in your authority area? As far as I am aware, the sites that are receiving wastes from South London within the WLP area are still operating. I have checked websites and google maps which suggest these are still operating.	

Slough WPA	HCI from SLWPA Colnbrook Landfill (2017) 794 Lakeside EfW (2017) 107,592 Other (2017) 564 C&D from SLWPA Horton Bk Quarry (2017) 4,875 Other (2017) 800	In table 1 the Colnbrook, which I assume to be the Biffa site is now effectively completed. The Lakeside EfW is proposed to be demolished if the third runway at Heathrow goes ahead. As a result we currently have a planning application to build a replacement facility. There is, however, a risk that this will not get planning permission and that it may not be built. As a result it cannot automatically be assumed that the facility will be able to take waste from your plan area. In table 2 Horton Brook Quarry may have a Slough address	No issues. The Lakeside ERF is run by Viridor and the capacity currently going to the Lakeside ERF is expected to transfer to the Beddington ERF when it is fully operational.
Solihull Metropolitan Borough Council	HCI from SLWPA Meridian Quarry (2017) 6,869	Dut it is actually in Windsor and Maidenhead. Thank you for your message and attachments dated 31 October 2019 concerning the above. I note the movements of wastes set out in the table attached to your message. I confirm that this is the position as far as data from the WDI 2017 is concerned. The WDI2018 confirms that exports have continued to Solihull, although the tonnage at 1,889t was lower than for 2017. The WDI confirms that the waste from Croydon and Merton is managed at Meriden Quarry by A & A Recycling, who deal in waste wood and timber. The operator has a temporary planning permission up to 31 March 2025, which was linked to the anticipated lifespan of the quarry, previously operated by Tarmac. However, Meriden Quarry has been taken over by NRS Wastecare and applications are expected for extension of sand and gravel extraction which would increase its lifespan. As a result, it is likely that if A & A Recycling seek an extension of the permission, it would be forthcoming. This should give you some assurance that the site will continue to be available to manage the small quantity of waste exported from your Boroughs into the future.	No issues

		I note your Boroughs thresholds for strategic waste movements. The West Midlands RTAB agreed its own thresholds for strategic waste movements some years ago, and there are some variations from those you are using. For hazardous wastes the threshold is 1,000 tonnes, and for other wastes 5,000 tonnes, although at a recent RTAB meeting, it was agreed these were probably too low to reflect strategic movements and should be revised. Revised figures have yet to be formally agreed however. A Waste Needs Assessment was prepared for Solihull in 2018 to inform the current Solihull Local Plan Review, and this document can be viewed via this link	
Carrellance	HCI from SLWPA	http://www.solihull.gov.uk/lpr/evidence.	No some sort
Southwark,		No response from the Issues and Preferred Options consultation	No comment.
London Borough of	Southwark Integrated Waste	Consultation	Currently seeking to make contact.
OI	Management Facility (2017) 8,350		make contact.
Surrey County	HCI from SLWPA	Whether you consider the waste movements between the	The HCI capacity will
Council	Redhill Landfill (2017) 40,520	four South London boroughs and your authority are correct?	be managed by the
Council	West London AD (2017) 20,961	Having run a complete search using the Waste Data	Beddington ERF. The
	Other (2017) 2,311	Interrogator 2017 and Hazardous Data Interrogator 2017,	C&D capacity will
	C&D from SLWPA	Surrey County Council agrees that these waste movement	need to be considered
	Redhill Landfill (2017) 30,960	figures are correct. Please note, we have recently got	but the Councils are
	Addlestone Quarry (2017)	access to the 2018 Waste Data Interrogator and Hazardous	aiming to be self-
	11,322	Data Interrogator are now available to download from the	sufficient
	D&E Roberts (2017) 4,571	EA website.	Gameren
	Stanwell 111 (2017) 8,820		
	Ellerton Yard (2017) 15,680	Are all of the sites listed in the attached table still operating	
	Egap Recycling (2017) 4,214	in your authority area?	
	Land at Cranleigh Brick & Tile	Yes, all of the sites listed in Surrey are still in operation.	
	(2017) 11,253	,	
	Lomond Equestrian (2107)	Are you aware of any planning reasons (or other reasons)	
	6,428	why these waste movements cannot continue in the future?	

	Other (2017) 3,752 Hazardous from SLWPA Asbestos to Landfill (2017) 959 Oil & Oil Mixtures (2017) 72 Asbestos Treatment (2017) 1,446 Other (2017) 136 HCI to SLWPA Mitcham transfer (2017) 21,817 Pear Tree Farm (2017) 7,420 HCL House (2017) 1,413 Other (2017) 183 C&D to SLWPA Chessington Equestrian (2017) 18,989 Henry Woods (2017) 9,815 LMD (2017) 9,914 Other (2017) 4,384 Hazardous to SLWPA Healthcare (2017) 254 Asbestos (2017) 130 Not specified (2017) 77 Oil & Oil Mixtures (2017) 47 Paint & Varnish (2017) 9 Packaging (2017) 17	Patteson Court (Redhill Landfill) is due to close and be fully restored by 2030 and will cease to accept waste prior to this date. We expect this could be as early as 2027. Your local plan should take account of this if a significant amount of waste is currently going to this site. Do you have any comments on the waste movements from the South London Waste Plan boroughs to your authority area? Are there plans in place to deal with the current waste being deposited in Patteson Court landfill once the site is closed?	
Telford & Wrekin	Other (2017) 24 Hazardous from SLWPA	No response from the Issues and Preferred Options	No comment
WPA	Municipal & Commercial Recovery (2017) 751	consultation.	
Thurrock WPA	HCI from SLWPA Fort Road Biomass (2017) 3,365 Tilbury Green Power (2017) 2,312 Other (2017) 114	No response from the Issues and Preferred Options consultation.	No comment

Wakefield WPA	Hazardous from SLWPA Other (2017) 172	No response from the Issues and Preferred Options consultation.	No comment
Walsall WPA	Hazardous from SLWPA Other (2017) 602	No response from the Issues and Preferred Options consultation.	No comment
Wandsworth, London Borough of	C&D from SLWPA Willows Recycling (2017) 40,105 C&D to SLWPA Waste Transfer & Recovery (2017) 10,526 Other (2017) 34	No response from the Issues and Preferred Options consultation.	Part of the Western Riverside Waste Authority. Currently seeking to make contact.
West London Boroughs	Hazardous from SLWPA Healthcare Incineration (2017) 364 Oil & Oil Mixes Recovery (2017) 158 Other (2017) 166	No response from the Issues and Preferred Options consultation.	Part of the West London Waste Plan grouping. Currently seeking to make contact.
Westminster, London Borough of	C&D to SLWPA Transfer & Recovery (2017) 3,860	Whether you consider the waste movements between the four South London boroughs and your authority are correct? It is our understanding that the data from the WDI gives the most accurate representation of waste movements, and the data is therefore correct. Are all of the sites listed in the attached table still operating in your authority area? Not applicable. Are you aware of any planning reasons (or other reasons) why these waste movements cannot continue in the future? No. Do you have any comments on the waste movements from the South London Waste Plan boroughs to your authority area? No applicable.	No issues

		In addition we would like to make the boroughs aware that Westminster is currently exploring options to pool its London Plan waste apportionment with other boroughs. In light of this we would like to stay informed of progress on the South East London Waste Plan and continue engagement under the Duty to Co-operate.	
West Sussex County Council	HCI from SLWPA Olus Biomass (2017) 5,158 Sweeptech Recycling (2017) 2,638 Other (2107) 767 C&D from SLWPA Other (2017) 1,842 HCI to SLWPA Other (2017) 1,338	No response from the Issues and Preferred Options consultation.	No comment
Wiltshire County Council	Hazardous from SLWPA Asbestos Landfill (2017) 76 Other (2017) 2	No response from the Issues and Preferred Options consultation.	No comment









