East London Joint Waste Plan

Identification of Strategically Significant Cross Boundary Waste Movements

Version Description: Regulation 19 Consultation Draft

Version: 2.2

Issued: February 2025

BPP Consulting Document Control

Project: East London Joint Waste Plan

Report: Identification of Strategically Significant Cross Boundary Waste Movements

Version Description: Regulation 19 Consultation Draft

Version No.: 2.2

Date: 19.02.2025

Version No.	Version Description	Author	Date	Reviewed	Date
1.0	Partner Review	Alan Potter (Partner)	10.04.2024	Ian Blake (Partner)	*12.04.24*
2.1	Regulation 18 Consultation Draft	Ella Mills (Data Analyst)	14.05.2024	Alan Potter (Partner)	16.05.2024
2.2	Regulation 19 Consultation Draft	Ella Mills (Data Analyst)	18.02.2025	Alan Potter (Partner)	19.02.2025

Table of Contents

List of Tables

List of Figures

1. Introduction

The purpose of this report is to undertake an assessment of the movements of waste (a.k.a. waste flows) between East London and other waste planning authority areas to determine which movements may be regarded as strategic (or strategic in future). Establishing strategic movements is a necessary step in determining whether the emerging East London Joint Waste Plan can rely on such movements over the plan period or whether it needs to specifically include provision for additional capacity to address potential shortfalls. Where strategic movements are identified the relevant Waste Planning Authorities (WPAs) will be contacted to establish whether ongoing movements into their area can be relied upon.

Engagement with WPAs involves consideration of the following:

1. Whether historical flows of waste identified in this report are likely to continue;
2. Barriers to the continuation of waste exports due to, for example, exhaustion of finite capacity facilities and cessation due to time limited availability;
3. Whether new flows of waste beyond the Plan area are likely to take place. This takes the above factors into account as well as any changes in capacity that the management of waste arising in East London currently relies on (situated either within or beyond East London).

Advice is provided to support the East London Boroughs as WPAs for East London in their engagement activities by recommending which WPAs should be contacted about which waste movements.

This report forms part of the evidence base for the emerging East London Joint Waste Plan.

2. Waste as a Strategic Issue

The management of waste has little regard for administrative boundaries, with waste arising in one WPA area often being managed in another. Furthermore, waste management facilities may have catchments that extend beyond the boundary of the Plan area within which it is situated. Such flows are recognised in relation to the disposal of waste and recovery of mixed municipal waste in particular in the National Planning Policy for Waste that expects waste planning authorities to:

> "*…plan for the disposal of waste and the recovery of mixed municipal waste in line with the proximity principle, recognising that new facilities will need to serve catchment areas large enough to secure the economic viability of the plant*;" .

Hence the management of waste can be a cross boundary strategic matter, the planning for which may require co-operation between WPAs.

2.1 The Duty to Cooperate

Section 33A of the *Planning and Compulsory Purchase Act 2004* requires Councils in England that produce development plan documents to cooperate with local planning authorities, county councils and bodies or other persons as prescribed. The Duty to Cooperate imposes, in particular, a duty to: *engage constructively, actively and on an ongoing basis*" .This is to have "*regard to*" activities concerned with supporting or preparing planning policies "*so far as relating to a strategic matter*" . in "*maximising the effectiveness*" of Local Plans.

The Duty applies to the preparation of development plan documents, in so far as they relate to a "*strategic matter*". A strategic matter is defined as "*sustainable development or use of land that has or would have a significant impact on at least two planning areas including... in connection with infrastructure that is strategic*..." (S33A(4)). Waste management qualifies as a strategic matter for the purposes of the Duty.

The updated National Planning Policy Framework (December 2023) expects that Local Plans include strategic' policies that:

> "*...set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:…..infrastructure*"

and this includes "*for…..waste management*" .

It goes on to state that:

> "*In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these*."

The recently published *Levelling up and Regeneration Act 2023* includes provisions for the revocation of the Duty to Cooperate. However, at the time of writing, the regulations and guidance that would enact these provisions have still to be published and until such time, the Duty remains a requirement in Plan making that is intended to seek alignment between Plan making bodies and other Plan making and statutory bodies. It is anticipated that whatever replacement mechanism is put in place, an assessment of strategic flows of waste will still need to be undertaken for plan making purposes.

2.2 Net Self Sufficiency

Net self sufficiency is an approach applied in waste planning to establish how much capacity should be planned for in each waste Plan area. This follows the polluter pays principle whereby the area that produces the pollution (in this case waste) should be responsible for managing it. The self sufficiency requirement is subject to the 'net' caveat as waste does not recognise administrative boundaries and so there is no expectation that every tonne of waste produced in a particular Plan area ought to be managed within that Plan area, rather that, overall, there should be a balance of provision. The objective of net self sufficiency is therefore to ensure that there is sufficient capacity to manage the tonnage of waste equivalent to that predicted to arise within a Plan area.

In the case of East London, The London Plan 2021 sets out the expectation for London as a whole to achieve net self sufficiency by 2026 (Policy SI 8 A 1) and to continue to be so for the Plan period. The apportionments that apply to household, commercial and industrial (HCI) waste produced in London is intended to ensure this objective is achieved at Borough level. Hence while achievement and maintenance of net self sufficiency is not a stated objective of the emerging ELJWP it can be inferred for HIC waste as a minimum.

The degree to which a Plan area is net self sufficient is established by comparing the available capacity within the Plan area with the projected capacity requirements, to ascertain if there is any gap. The management of any waste by disposal or recovery of mixed municipal waste is subject to the proximity principle[1] which means that it should be managed at one of the nearest appropriate facilities. Such a facility may be located outside a Plan area.

[1] See National Planning Policy for Waste

2.3 Identifying Waste Flows that might be strategic

A key matter to address when assessing the robustness of the emerging Plan strategy is to establish whether key historical patterns of management of waste outside of the Plan area can be relied upon for the duration of the Plan period. To ensure compliance with the Duty to Cooperate, the focus for engagement in this case is therefore to address outgoing waste flows, which may be regarded as 'strategic' in nature.

'Strategic' flows of waste have been identified applying the following approach:

Step 1. Does the flow to the WPA area exceed the initial significance screening thresholds?

The guideline values provided in the National Waste TAB Chairs 'Duty to Cooperate on Waste – Practice Guide for Waste Planning Authorities in England' were used as follows:

- *Non-hazardous waste: 5,000 tonnes per annum*
- *Inert waste: 10,000 tonnes per annum*
- *Hazardous waste: 100 tonnes per annum*

Step 2. Does the specific flow represent a significant proportion of total arisings of the particular waste type produced in the Plan area?

It is considered that where flows that exceed the screening thresholds represented an amount greater than 20% or a fifth of the total quantity of that particular waste type produced in the Plan area it may be considered to be strategic and hence this value was used as a further screening threshold.

Step 3: Does the specific flow go to a single site or multiple sites?

Where flows to a particular Plan area went to a single or small number of sites the dependency is greater than if it was distributed across a large number of sites. This suggests that flows to such sites would be of strategic importance to a Plan strategy. Conversely where inputs to individual sites fell below the screening threshold they have been excluded from further analysis.

The following section assesses the flows of waste from East London to other Plan areas that might be considered strategic in nature.

It should be noted that only flows between WPAs located in England have been considered, as the principal data source used, the Environment Agency Waste Data Interrogator, only reports on inputs to site located in England subject to Environment Agency environmental permits. Hence possible flows to sites located in Scotland and Wales and further afield are not accounted for in this exercise. Having said that, the geographical location of East London and spread of flows to facilities in England indicated by this report suggests it is highly unlikely that additional strategic flows between East London and Wales and/or Scotland exist.

3. Assessing Waste Flows from East London

3.1 Net Self Sufficiency Balance

Table 1 below shows the tonnages of waste attributed to East London in the WDI 2022 managed at permitted facilities within East London and beyond, as well as the tonnage of waste from outside of East London managed within East London in 2022.

Table 1: Tonnages of East London waste managed in permitted facilities within East London and outside East London, and tonnage of imported waste to East London facilities

Source: WDI 2022

East London arisings		Managed in East London		
	East London waste managed outside East London	East London waste managed in East London	Waste imported to East London	Total Managed
	859,030	931,768	4,671,537	5,603,305
Total East London waste managed	1,790,798			

Table 1 shows that c0.9M tonnes of East London's waste were managed in East London in 2022. This compares with c0.8M tonnes of East London waste managed outside East London. This export is offset by the significant import of waste for management from outside East London of c4.7M tonnes. So, taking this snapshot as a simple balance, it can be said that in 2022 East London achieved and far exceeded net self sufficiency in management capacity, imports of waste being substantially greater than waste exports (4.7Mt imported vs 0.8Mt exported). Figure 1[2] displays the balance between imports and exports by waste management method and waste type.

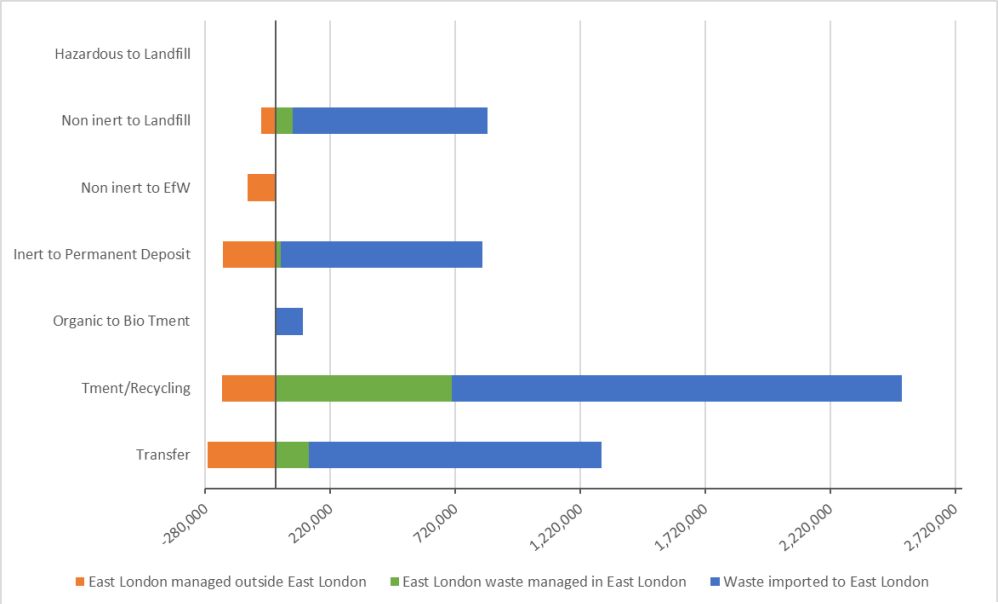

Figure 1: Waste import and export balance in East London 2022 by management method and waste type where known (tonnes)

[2] Note that Figure 1 only includes waste managed at permitted sites in England and does not include any waste exported to Wales, Scotland or further afield as this is not reported in the WDI.

It should be noted that Figure 1 presents:

1. A snapshot in time for a single year; and
2. is not necessarily a true representation of net -self-sufficiency as actual inputs to facilities in 2022 may not be reflective of potential capacity of sites operating in East London (in most cases inputs will be lower than actual site capacity).

3.2 Identifying Potentially Strategic Waste Flows

Step 1: Applying the National Waste Movement Screening Guidelines

The waste movement guidelines referred to above have been applied as thresholds by waste category to screen out movements that would not be considered strategic to the Plan area. Table 2 shows movements of waste from East London in 2022 (latest data available) to other WPAs (in rank order) where one or more of the thresholds have been met or exceeded by waste category.

Table 2: Destination WPAs of Non-inert. Inert and Hazardous Waste, exports from East London in rank order by total applying National DtC Guidelines as Thresholds 2022

Source: WDI 2022

Highlighted entries are those where initial screening threshold values have been exceeded

Receiving WPA	Non-inert	Inert	Hazardous
Sheffield	<5,000	193,677[3]	0
Essex	17,609	93,257	279
Buckinghamshire	<5,000	103,592	0
Thurrock	40,166	50,856	<100
Wakefield	49,633	0	0
Oxfordshire	11,227	30,486	0
LB Enfield	7,288	32,003	0
Kent	36,092	<10,000	1,546
Medway	29,556	<10,000	1,925
Greenwich	<5,000	29,301	0
Lincolnshire	25,092	0	0
Waltham Forest	<5,000	10,051	<100
North Lincolnshire	9,851	0	0
Milton Keynes	7,313	<10,000	0
Liverpool	6,159	<10,000	254
Rotherham	6,240	<10,000	0
Derbyshire	5,831	<10,000	<100
Leeds	<5,000	0	3,214
Staffordshire	<5,000	<10,000	1,743
Sandwell	<5,000	<10,000	1,260
Surrey	0	0	1,234
Manchester	<5,000	0	500
West Sussex	<5,000	<10,000	440
Tameside	0	0	337
Walsall	<5,000	<10,000	323
Hertfordshire	<5,000	<10,000	278
Kingston Upon Hull City	<5,000	0	248
Suffolk	<5,000	0	247
LB Bexley	0	0	210
Salford	<5,000	0	127
Stoke-on-Trent City	<5,000	<10,000	124
Bedford	<5,000	0	111

Table 2 shows that in 2022 a total of 32 WPA areas accepted quantities of waste from East London in excess of the strategic screening thresholds, with 7 accepting waste in quantities that exceeded at least two of the screening thresholds. However, if the guideline screening threshold for hazardous waste movements was increased to 500t the number would fall to 22 WPAs in total.

[3] Transported via rail depot.

In addition, analysis of data for 2020 and 2021 indicates a further 3 WPAs received waste in excess of the initial screening thresholds. The WPAs are listed in Appendix 1 and the sites in Appendix 2.

Step 2: Establishing if the Movements are of Strategic Significance.

The movements from East London that exceed the guideline screening thresholds listed in Table 2 may only be considered to be strategic following further analysis as to the significance each movement may have for the overall management of the particular waste stream arising within the Plan area (in this case East London).

This is assessed primarily in terms of:

1. The proportion of overall tonnage arising that the movement accounts for; and
2. the availability of alternative capacity within the Plan area catchment (this is represented by the distance from East London equivalent to the furthest site waste of that type travels to (this varies depending on the waste type being considered)).

For the purpose of this exercise, a value of over 20% i.e. a fifth of the total arising of each waste type has been taken as a threshold of significance. The outputs of this exercise are displayed in Tables 3, 4 and 5 below. The total tonnages shown should not be taken as actual arisings as there will be a degree of double counting in the values with the same waste being managed at a number of facilities before reaching its final fate.

Table 3: Principal Flows of HIC waste arising in East London
Source: WDI 2022
Highlighted entries are those that exceed 20% significance threshold

Waste Type	Total tonnes arising in East London	Destination WPA	Total Tonnes Received by WPA	Proportion of total waste arising from East London managed at WPA
Mixed municipal waste	407,788	Medway	16,405	4%
Process residues	124,285	Kent	26,021	21%
		Essex	17,313	14%
		Oxfordshire	9,631	8%
		Milton Keynes	7,313	6%
		LB Enfield	5,547	4%
RDF	59,690	Wakefield	49,630	83%
		Kent	7,380	12%
Wood	39,449	Thurrock	31,062	79%
		Rotherham	6,240	16%
Plastic and rubber	37,665	Lincolnshire	20,124	53%
		Derbyshire	5,753	15%
Glass	12,761	North Lincolnshire	9,851	77%
Fluff light fraction	9,589	Medway	8,675	90%

Table 3 shows the following:

- Non-inert waste travels significant distances for management from East London (as far as Wakefield (c186 miles and 3.5 hour drivetime) in some cases; and,
- the three dominant flows were process residues from East London waste management facilities at c66,000 tonnes, RDF at c57,000 tonnes and wood at c37,500 tonnes; and
- Of the non-inert waste exported, 6 movements in 2022 exceeded the 20% significance threshold.

Table 4: Principal Flows of Inert waste arising in East London

Source: WDI 2022

Highlighted entries are those that exceed 20%

Waste Type	Total tonnes arising in East London	Destination WPA	Total Tonnes Received by WPA	Proportion of total waste arising from East London managed at WPA
Soil and stones	534,904	Sheffield	193,677	36%
		Buckinghamshire	103,592	19%
		Essex	84,243	16%
		Oxfordshire	30,486	6%
		Thurrock	19,446	4%
Mixed construction and demolition wastes	98,468	LB Enfield	30,641	31%
		LB Greenwich	13,080	13%

Table 4 shows the following:

- Transport of inert waste out of East London to other parts of London and the Home Counties (inc Oxfordshire) is widespread with a significant flow to Sheffield via rail as a consequence of a railhead; and
- the two dominant flows were soils & stones at c431,500 tonnes, and mixed CDE at c43,500 tonnes; and,
- of the inert waste exported only 3 movements in 2022 exceeded the 20% significance threshold.

Table 5: Principal Flows of Hazardous waste arising in East London

Source: WDI 2022

Highlighted yellow entries are those that exceed 20%; amber entries exceed 20% but fall below 500t significance threshold

Waste Type	Total tonnes arising in East London	Destination WPA	Total Tonnes Received by WPA	Proportion of total waste arising from East London managed at WPA
Solid wastes from gas treatment[4]	3,383	Leeds	3,171	94%
		Suffolk	212	6%
Lead acid batteries	2,968	Staffordshire	1,650	56%
		Manchester	494	17%
		Walsall	295	10%
Soil and stones containing dangerous substances	2,270	Surrey	1,225	54%
		Sandwell	1,045	46%
Hazardous components	2,028	West Sussex	440	22%
ELV depollution residues	1,634	Medway	1,368	84%
		LB Bexley	210	13%
WEEE	1,538	Kent	1,246	81%
		Liverpool	217	14%
Infectious waste	625	Medway	482	77%
Other fuels	365	Kingston Upon Hull City	248	68%
		Tameside	112	31%
Construction materials containing asbestos	311	Sandwell	181	58%
Petrol	212	Tameside	212	100%
ELVs	183	Kent	112	61%
Oily water from oil/water separators	171	Hertfordshire	162	95%

Table 5 shows the following:

- the three dominant flows were solid wastes from gas treatment at c3,500 tonnes; lead acid batteries from vehicles at c2,500 tonnes and hazardous soils and stones (contaminated land) at c2,500 tonnes.
- Of the hazardous waste exported, 14 movements in 2022 exceeded the 20% significance threshold; and
- if 500 tonnes is used as the threshold, the number of movements that exceed the 20% significance threshold falling below 500 tonnes reduces to 6.

Given a large number of sites (8) received more than 100 tonnes but less than 500 tonnes of hazardous waste from East London, it is considered that these are not as significant as the

[4] There is no known source of this waste type in East London so this may be a data anomaly.

flows that exceed a 500-tonne threshold and account for 20% or more of the total quantity produced. Therefore, the next step excludes sites that received less than 500 tonnes.

Step 3: Identifying Specific Receiving Sites of Strategic Significance.

Detailed examination of the waste stream specific totals indicates that movements of waste from East London that ***might*** be classed as strategically significant i.e. met or exceeded the screening thresholds, were managed at the sites shown in the following tables. It is considered that where strategic flows went to a small number of sites the strategic dependency is greater than if it was distributed across a large number of sites. This suggests that flows to such sites would be of greater strategic importance to a Plan strategy. Conversely where inputs to individual sites fell below the screening threshold they have been excluded from further analysis.

A detailed analysis by principal waste streams has been conducted using 2022 data.

East London Non-Inert Waste Destinations

Table 6 shows the destination sites for East London non-inert waste which received more than 5,000 tonnes in 2022 where the tonnage received exceeded the 20% significance threshold.

Table 6: Destination sites for East London Non-Inert Waste exports > 5,000t and >20% by WPA in rank order by tonnes

Source: WDI 2022

WPA	Site Category	Site Name	Site Operator	Waste Type	Tonnage
Kent	Landfill	Shelford Landfill Site	Valencia Waste Management Ltd	Process residues	23,403
Wakefield	Incineration	Ferrybridge 2	Enfinium Ferrybridge 2 Ltd	RDF	42,828
		Ferrybridge 1	Enfinium Ferrybridge 1 Ltd		6,803
Thurrock		Tilbury Green Power, Port of Tilbury	Tilbury Green Power Ltd	Wood	26,045
	Treatment	Fort Road Biomass Processing Plant	Esken Renewables Ltd		5,017
Lincolnshire	Transfer	Hemswell Business Park	Clean Tech (UK) Ltd	Plastic and rubber	20,733
North Lincolnshire	Treatment	Groveport, Grove Wharf, Gunnes	M R F Glass Recycling Ltd	Glass	9,851
Medway		Berth 6, Chatham Dockyard	Street Fuel Ltd	Fluff light fraction	8,675

Table 6 shows the significant flows of non-inert waste from East London were managed at 8 facilities located in 6 WPAs.

East London Inert Waste Destinations

Table 4 shows the destination sites for inert waste from East London that received more than 10,000 tonnes in 2022 where the tonnage received exceeded the 20% significance threshold.

Table 7: Destination sites for East London Inert Waste exports >10,000t and >20% by WPA in rank order by tonnes

Source: WDI 2022

WPA	Site Category	Site Name	Site Operator	Waste Type	Tonnage
Sheffield	Transfer	Tinsley Sidings	DB Cargo (UK) Ltd	Soils and stones	193,677
LB Enfield		Pegamoid Site	J O' Doherty Haulage Ltd	Mixed construction and demolition wastes	23,195

Table 7 shows the significant flows of inert waste from East London were managed at 2 facilities located in 2 WPAs.

East London Hazardous Waste Destinations

Table 8 shows the destination sites for East London hazardous waste receiving more than 100 tonnes where the tonnage received exceeded the 20% significance threshold. Note that the WDI has been used to produce Table 8 given the HWI does not report site specific details, and due to the WDI tendency to under report arisings by specific WPA the data shown in Table 8 does not align with that displayed in Table 5 in all cases

Table 8: Destination sites for East London Hazardous Waste exports c100t or more in 2022 and >20% by WPA in rank order by tonnes

Source: WDI 2022

WPA	Site Category	Site Name	Site Operator	Waste Type	Tonnage
Leeds	Treatment	Aggregates Manufacturing Facility	O.C.O Technology Ltd	Solid wastes from gas treatment	3,171
Staffordshire		Unit 22, Watling St Business Park	Super R Ltd	Lead acid batteries	964
Surrey	Landfill	Patteson Court Landfill Site Redhill	Biffa Waste Services Ltd	Soil and stones containing dangerous substances	1,234
Sandwell	Treatment	ERQ - STC	Waste Recycling Group (Central) Ltd		1,221
Medway		Kingsnorth Oil TP	Slicker Recycling Ltd	ELV depollution residues	1,420
Kent		Gas Road, Sittingbourne	Sweeep Kuusakoski Ltd	WEEE	1,246

Table 8 shows the hazardous waste exported was primarily managed at 6 sites located in 6 WPAs.

4. Summary

A total of 16 sites were initially identified as receiving potentially strategically significant quantities of waste from East London in 2022. These were spread across a total of 12 WPA areas.

Further analysis suggests the Plan area has strategically significant reliance on facilities located in the 12 WPA areas identified in Table 9 below.

Table 9: WPA areas to which strategically significant tonnages of East London waste flowed in 2022 by principal waste type (in alphabetical order)

WPA	Non-inert	Inert	Hazardous
Kent	23,403	-	1,246
LB Enfield	-	23,195	-
Leeds	-	-	3,171
Lincolnshire	20,733	-	-
Medway	8,675	-	1,420
North Lincolnshire	9,851	-	
Sandwell	-	-	1,221
Sheffield	-	193,677[5]	
Staffordshire	-	-	964
Surrey	-	-	1,234
Thurrock	31,062	-	-
Wakefield	49,630[6]	-	-

These strategically significant flows have been mapped in Figure 2 & 3 below.

[5] Soil & stones received at Tinsley Sidings operated by DB Cargo. Believed to be transferred on to Thurcroft Landfill in Rotherham (reported as waste received from Sheffield).

[6] Refuse derived fuel managed at Enfinium EfW plant.

Figure 2: Significant Waste Flows from East London in 2022 by receiving WPA and principal waste type - England (tonnes)

5. Recommendation

It is recommended that 12 WPAs hosting facilities identified as having received waste movements from East London in quantities that may be regarded as strategic be contacted to confirm the following:

1. Whether the facilities identified as receiving waste are still operational given the dataset is for 2022.
2. Any planning reasons that might mean the acceptance of wastes from East London cannot continue, such as consent conditions and end dates; or if the site has been earmarked in local plans for redevelopment. In addition, where no planning reason is given confirmation that the site is safeguarded for the management of that type of waste should be sought.
3. Whether the host WPA has any specific policies in its local plan concerning providing for the management of waste that arises outside their respective Plan area.
4. Whether any Statements of Common Ground have been entered into, or whether there has been correspondence, with other source WPAs concerning continued availability of capacity at the facility in question, that might compromise continued access for East London's waste.

Furthermore, it is recommended that all WPAs receiving waste from East London in quantities which exceed the initial screening thresholds be given the opportunity to comment when the emerging ELJWP is published for consultation. This will provide an opportunity for WPAs to set out their position on waste movements from East London.

The outcomes of the above engagement should be documented, and agreement sought with WPAs hosting facilities expected to take strategically significant quantities of waste for which ongoing access is to be relied upon during the Plan period as appropriate. While in most cases it is envisaged that agreement will be achieved via an exchange of correspondence, host WPAs will be invited to consider whether a Statement of Common Ground is necessary.

Appendix 1: Destination WPAs of Hazardous, Non-inert and Inert Waste exports from East London applying initial screening thresholds 2020-2022

Highlighted cells: Green – WPAs receiving waste from East London above screening thresholds
Yellow- additional WPAs receiving waste from East London above screening thresholds in 2020 and/or 2021
Source: WDI 2020, 2021 & 2022

Facility WPA	Non-Inert			Inert			Hazardous		
	2020	2021	2022	2020	2021	2022	2020	2021	2022
Sheffield	<5,000	<5,000	<5,000	0	0	193,677	0	<100	0
Essex	47,176	48,796	17,609	152,435	124,503	93,257	206	287	279
Buckinghamshire	<5,000	<5,000	<5,000	198,681	11,532	103,592	<100	<100	0
Thurrock	99,982	183,694	40,166	148,807	203,339	50,856	<100	<100	<100
Wakefield	20,154	41,711	49,633	0	0	0	0	0	0
Oxfordshire	<5,000	13,924	11,227	<10,000	98,799	30,486	0	0	0
Enfield	12,284	<5,000	7,288	20,708	28,845	32,003	0	0	0
Kent	61,312	63,994	36,092	<10,000	<10,000	<10,000	1,478	1,467	1,546
Medway	13,375	30,250	29,556	0	<10,000	<10,000	1,187	1,445	1,925
Greenwich	<5,000	12,599	<5,000	43,971	50,006	29,301	<100	0	0
Lincolnshire	13,571	23,505	25,092	0	0	0	0	0	0
Waltham Forest	<5,000	<5,000	<5,000	11,585	10,422	10,051	<100	<100	<100
North Lincolnshire	<5,000	8,718	9,851	0	0	0	<100	0	0
Milton Keynes	<5,000	34,412	7,313	0	0	<10,000	0	0	0
Liverpool	<5,000	7,129	6,159	0	0	<10,000	131	290	254
Rotherham	11,927	16,998	6,240	<10,000	<10,000	<10,000	0	0	0
Derbyshire	<5,000	<5,000	5,831	<10,000	0	<10,000	100	<100	<100
Leeds	<5,000	<5,000	<5,000	0	0	0	<100	780	3,214
Staffordshire	<5,000	<5,000	<5,000	38,407	<10,000	<10,000	119	<100	1,743
Sandwell	<5,000	<5,000	<5,000	0	0	<10,000	948	1,259	1,260

Surrey	<5,000	<5,000	0	<10,000	<10,000	0	<100	<100	1,234
Manchester	<5,000	<5,000	<5,000	0	0	0	<100	565	500
West Sussex	<5,000	<5,000	<5,000	<10,000	0	<10,000	0	0	440
Tameside	<5,000	0	0	0	0	0	285	456	337
Walsall	<5,000	<5,000	<5,000	<10,000	0	<10,000	1,504	1,893	323
Hertfordshire	6,983	<5,000	<5,000	<10,000	<10,000	<10,000	210	213	278
Kingston Upon Hull City	0	<5,000	<5,000	0	0	0	0	0	248
Suffolk	<5,000	<5,000	<5,000	0	0	0	1,848	224	247
Bexley	0	0	0	0	0	0	<100	187	210
Salford	<5,000	<5,000	<5,000	<10,000	0	0	133	101	127
Stoke-on-Trent City	<5,000	<5,000	<5,000	<10,000	<10,000	<10,000	253	138	124
Bedford	<5,000	<5,000	<5,000	0	0	0	139	<100	111
East Sussex	12,777	8,369	<5,000	19,287	14,000	0	0	0	0
Lewisham	102,820	17,503	<5,000	0	<10,000	<10,000	0	0	0
Northamptonshire	<5,000	<5,000	<5,000	<10,000	<10,000	<10,000	3,382	<100	0

Appendix 2: Facilities that received tonnages of waste from East London above initial screening thresholds pre-2022

Year	Facility WPA	Site Category	Site Name	Operator	Principal Waste Type	Total
Non-inert						
2021	East Sussex	MRS	East Quay, Newhaven Port	Ripley Property Holdings Ltd	Ferrous metal	8,330
Inert						
2021	East Sussex	Incineration	Robertsbridge Gypsum Works	Saint-Gobain Construction Products UK Ltd	Gypsum CDE waste	12,043
Hazardous						
2020	Northamptonshire	Transfer	East Northants RM Facility	Augean South Ltd	Hazardous Soils and Stones	3,456