Gloucestershire Waste Management, Need & Infrastructure Capacity Assessment 2022

Cross Boundary Waste Movements & Duty to Cooperate

Report: Final Issue

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Contents

Table of Tables

List of Figures

Abbreviations

AD	Anaerobic Digestion
C & I	Commercial & Industrial Waste
C, D & E / CDEW	Construction, Demolition & Excavation Waste
EA	Environment Agency
EfW	Energy from Waste
ELV	End-of-Life Vehicle
HWRCs	Household Waste Recycling Centres
LACW	Local Authority Collected Waste
MRS	Metal Recycling Site
MRF	Material Recycling Facility
nPPG	national Planning Practice Guidance
NPPW	National Planning Policy for Waste
WDI	Waste Data Interrogator
WMNICA	Waste Management and Infrastructure Needs Assessment
WPA	Waste Planning Authority
WTS	Waste Transfer Station

Glossary of Terms

Agricultural Waste	Waste produced on a 'farm' in the course of 'farming'. Agricultural waste takes both 'natural' (or organic) and 'non- natural' forms e.g. plastics and metal.
Anaerobic Digestion	A process to manage organic matter including green waste and food waste broken down by bacteria in the absence of air, producing a gas (biogas) and nutrient rich solid or liquid (digestate). The biogas can be used to generate energy either in a furnace, gas engine, turbine or to power vehicles, and digestate can be applied to land as a fertiliser.
Bio waste	Waste that can break down over time due to natural biological action/processes, such as food, garden waste and paper.
Commercial Waste	Waste from factories or premises used for the purpose of trade or business, sport, recreation or entertainment.
Composting	A process in which biodegradable waste (such as green waste and kitchen waste) is broken down in aerobic conditions by naturally occurring micro-organisms to produce a material suitable for use as a soil improver.
Construction, Demolition & Excavation Waste	Waste arising from the building process comprising demolition and site clearance waste and builders' waste from the construction/demolition of buildings and infrastructure. Includes masonry, rubble and timber.
Energy from Waste	The conversion of the calorific value of waste into energy, normally heat or electricity through applying thermal treatment of some sort. May also include the production of gas that can be used to generate energy.
Environment Agency	The body responsible for the regulation of waste management activities through issuing permits to control activities that handle or produce waste. It also provides up-to-date information on waste management matters and deals with other matters such as water issues including flood protection.
Green waste	Biodegradable plant waste from gardens and parks such as grass and hedge trimmings, from domestic and commercial sources suitable for composting.
Hazardous Waste Landfill	Sites where hazardous waste may be disposed by landfill. This can be a dedicated site or a single cell within a non-hazardous landfill, which has been specifically designed and designated for depositing hazardous waste.
Hazardous Waste	Waste requiring special management under the Hazardous Waste Regulations 2005 due to posing potential risk to public health or the environment (when improperly treated, stored, transported or disposed). This can be due to the quantity, concentration, or characteristics of the waste.
Household Waste	Waste from households collected through kerbside rounds, bulky items collected from households and waste delivered by householders to household waste recycling centres and "bring recycling sites". along with waste from street sweepings, and public litter bins.
Incineration	The controlled combustion of waste. Energy may also be recovered in the form of heat (see Energy from Waste).
Industrial Waste	Waste arising from any factory and from any premises occupied by an industry (excluding mines and quarries).
Inert Landfill	Landfill site permitted to only accept inert waste for disposal.
Landfill (including land raising)	The permanent disposal of waste to land, by the filling of voids or similar features, or the construction of landforms above ground level (land-raising).
Local Authority	Waste collected by or on behalf of a local authority. Includes household waste and

Collected Waste	business waste were collected by a local authority and non-municipal fractions such as construction and demolition waste delivered to HWRCs. LACW is the definition used in statistical publications, which previously referred to municipal waste.
Materials Recycling Facility (MRF)	A facility for sorting recyclable materials from the incoming waste stream.
Non-Hazardous Waste Landfill	A landfill permitted to accept non-inert (biodegradable) wastes e.g. municipal and commercial and industrial waste and other non-hazardous (including inert) wastes. May only accept hazardous waste if a special cell is constructed.
Recovery	Subjecting waste to processes that recover value including recycling, composting or thermal treatment to recover energy.
Recycling	The reprocessing of materials extracted from the waste stream either into the same product or a different one.
The Plan area	The area subject to the Waste Local Plan to which this study relates. In this case the county of Gloucestershire including the Lake District National Park.
Waste Planning Authority	The authority responsible for planning for waste within a specific administrative area. In this case Gloucestershire County Council and the Lake District National Park Authority.
Waste Transfer Station	A site to which waste is delivered for sorting or baling prior to transfer to another place for recycling, treatment or disposal.

1. Introduction

The purpose of this report is to assess the nature and quantum of movements of waste (a.k.a. waste flows) between Gloucestershire and other Plan areas to determine those that may be regarded as strategic for the purposes of engagement with other Waste Planning Authorities (WPAs) under the Duty to Cooperate (DtC).

Duty to Cooperate engagement is intended to establish the resilience of existing and future waste flows that may be regarded as strategic involving consideration of the following:

1. Whether historical flows of waste identified in this report are likely to continue including consideration of any barriers to the continuation of waste exports; and
2. whether new flows of waste beyond the Plan area are likely to occur, taking any predicted changes in capacity that the management of waste arising in Gloucestershire currently relies upon (situated either within or beyond Gloucestershire) into account.

DtC engagement is conducted against the backdrop of the national policy expectation that authorities should consider planning for the management of waste arising in other areas as appropriate.

Advice is provided to support Gloucestershire County Council in its DtC engagement activities and this includes identification of proposed 'target' WPAs.

2. The Duty to Cooperate

Section 33A of the *Planning and Compulsory Purchase Act 2004* requires Councils to cooperate with other 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 required in relation to "*maximising the effectiveness*" of, and having "*regard to",* activities concerned with supporting or preparing planning policies "*so far as relating to a strategic matter*". As such the Duty places a legal duty on Councils to engage "*constructively, actively and on an on-going basis*" in "*maximising the effectiveness*" of Local Plans.

As noted above, 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 'non-strategic' and 'strategic' policies, and explains that strategic policies should:

"... set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for…housing" and this includes "*for⋯..waste management*".

It goes on to specify 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 management of waste has little regard for administrative boundaries, with waste arising in one authority's area often being managed in another. Furthermore, waste management facilities may have a catchment which extends 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 requires co-operation between waste planning authorities.

As the consensus to what constitutes a 'strategic' level of waste movements varies between WPAs, the thresholds adopted by WPAs that form the South East Waste Planning Advisory Group (SEWPAG) have been applied as a starting point for considering whether dialogue is required:

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

It should be noted that the above thresholds are intended to be used as an initial screening tool only, and movements falling above these, may be further screened out following more detailed consideration of the significance of individual flows. This second stage is important given the expectation that flows of significance are to be subject to Statements of Common Ground between source and receiving WPAs[1].

[1] Note while it is expected that the Duty to Cooperate will be revoked under the *Levelling up and Regeneration Bill* currently going through Parliament, in the absence of any alternative mechanism this remains the approach being adopted in Plan making processes.

3. Waste Flows from Gloucestershire

3.1 Export and Imports of Waste to and from Gloucestershire

Table 1 below shows the tonnages of Gloucestershire waste managed at permitted facilities within Gloucestershire and outside, as well as the tonnage of waste managed within Gloucestershire from outside of Gloucestershire in 2021.

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

Source: WDI 2021

Gloucestershire arisings		Managed in Gloucs		
Total Gloucs waste	Of which managed outside Gloucs	Gloucs waste managed in Gloucs	Waste imported to Gloucs	Total Managed
2,163,604	463,325	1,700,278	511,654	2,211,932

Table 1 shows that c1,700,500 tonnes of Gloucestershire's waste was managed in Gloucestershire in 2021. This compares with c463,500 tonnes managed outside the county. This export is offset by the import of waste for management from outside Gloucestershire of c511,500 tonnes, specifically for recycling and transfer as shown in Figure 1. So, taking this snapshot as a simple balance, Gloucestershire achieved net-self-sufficiency in 2021. Figure 1[2] displays visually the balance between imports and exports by waste management method and waste type in Gloucestershire.

It should be noted that this is a single snapshot in time for a year and is not necessarily a true representation of net -self-sufficiency as actual inputs for 2021 may not be reflective of total capacity (and can be expected to be an underestimate of capacity in most cases other than landfill).

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

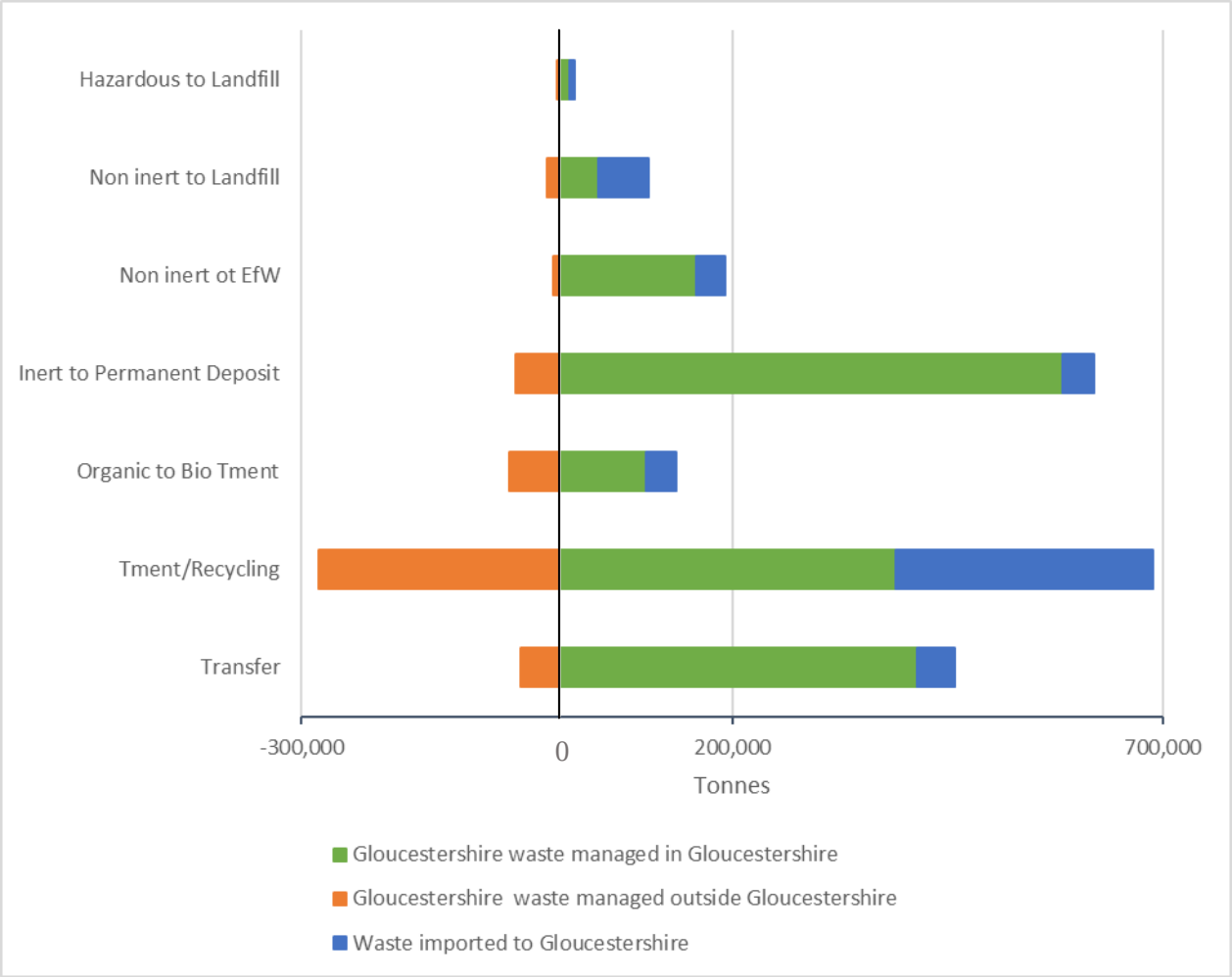

Figure 1: Waste import and export balance in Gloucestershire 2021 by management method and waste type where known (tonnes)

A key matter to address when assessing the robustness of the Plan strategy is to establish whether flows of waste-to-waste management facilities beyond the Plan area relied upon by a source WPA will be available for the duration of its Plan period. The focus for Duty to Cooperate engagement in this case is therefore to address outgoing waste flows and these are considered in the following section.

3.2 Applying DtC thresholds

The SEWPAG 'thresholds' for Duty to Cooperate referred to previously have been applied.

Table 2 below shows movements of waste from Gloucestershire in 2021 (latest data available) to other WPAs (in rank order) where one or more of the above thresholds have been met or exceeded.

Table 2: Destination WPA's of Inert, Non-inert and Hazardous Waste exports from Gloucestershire in rank order applying SEWPAG DtC thresholds 2021.

Source: WDI 2021

N.B. Entries highlighted are those where thresholds have been met or exceeded

Receiving WPA	Inert	Non-inert	Hazardous
Wiltshire	24,033	50,120	1,909
Bristol City	<10,000	54,024	3,089
Worcestershire	24,844	<5,000	3,880
South Gloucestershire	24,462	8,502	585
North Somerset	18,238	<5,000	5,651
Somerset	<10,000	17,755	<100
Nottinghamshire	<10,000	17,466	266
Wolverhampton	<10,000	<5,000	13,345
Swindon	<10,000	11,343	858
Birmingham City	<10,000	12,543	<100
Derbyshire	<10,000	11,067	410
Leicestershire	<10,000	10,678	100
Wakefield	10,496	<5,000	<100
Hertfordshire	<10,000	9,964	<100
Norfolk	<10,000	9,063	<100
Leicester City	<10,000	7,559	<100
Sandwell	<10,000	6,362	3,815
Solihull	<10,000	5,983	<100
Oxfordshire	<10,000	5,312	237
Walsall	<10,000	<5,000	1,458
Warwickshire	<10,000	<5,000	1,186
Salford	<10,000	<5,000	802
Cambridgeshire	<10,000	<5,000	481
Staffordshire	<10,000	<5,000	402
North East Lincolnshire	<10,000	<5,000	298
Telford and Wrekin	<10,000	<5,000	233
Nottingham City	<10,000	<5,000	230
Dorset	<10,000	<5,000	219
Tameside	<10,000	<5,000	183
Plymouth	<10,000	<5,000	163
Herefordshire	<10,000	<5,000	107

In 2021 a total of 31 WPAs accepted waste in excess of the screening SEWPAG DtC thresholds and 11 WPA's accepted waste in quantities that met or exceeded the thresholds in two or more of the target waste streams.

Detailed examination of the totals indicates that movements of waste from Gloucestershire that might be classed as strategically significant i.e. met or exceeded the screening DtC thresholds went to the sites shown in the following tables. It is considered that where strategic flows went to a small number of sites the strategic reliance is greater than if it was distributed across a large number of sites. This therefore suggests that flows to such sites are of greater strategic importance to the Plan strategy.

Conversely where inputs to individual sites fell below the threshold they have been excluded from further analysis even if the total tonnage going to the host WPA exceeded the threshold.

A detailed analysis by principal waste streams has been conducted using 2021 data, as shown in Table 3 below.

3.3 Gloucestershire Hazardous Waste Destinations

The principal destination WPAs receiving hazardous waste from Gloucestershire are shown in Table 3 below.

Table 3: Destination sites for Gloucestershire Hazardous Waste Exports 100t[3] or more in 2021 in Rank Order by WPA (total tonnage managed)

Source: WDI 2021

WPA	Facility Type	Site Name	Principal Waste Type 100t or more	Tonnes
Wolverhampton	Treatment	Horseley Field Waste Treatment Facility	Haz CDEW	13,345
North Somerset		Plot 2, Warne Road	Bituminous waste	5,646
Northamptonshire	Landfill	East Northants Resource Management Facility	black drosses from secondary production	192
	Treatment	East Northants RM Facility	Solid wastes from gas treatment	4,961
Worcestershire	Transfer	CSG Worcester	oily water from oil/water separators	1,225
	Landfill	Hartlebury Landfill Site	Haz CDEW	1,360
	MRS	R & C Metals	ELVs	606
	Storage	Stourport Oil Treatment Plant	Oil	315
	Treatment	Unit 145 Elm Drive	combination of other waste types (sub 100 tonnes)	211
Sandwell	Transfer	Bullock Street	combination of other waste types (sub 100 tonnes)	173
	Treatment	ERQ - STC	Haz CDEW	490
	MRS	Mighty Trading Ltd	ELVs	2,260
		Rabone Lane	WEEE	262
	Treatment	Wednesbury WM Resource Centre	sodium and potassium hydroxide	516
Bristol City		Augean Waste Treatment Plant	oily water from oil/water separators	523
	Incineration	Avonmouth Treatment Centre	combination of other waste types (sub 100 tonnes)	105
	Treatment	Clinipower Avonmouth L L P	Infectious Waste	249
		CSG Bristol Treatment Plant	Interceptor sludges	967
	MRS	Sims Group U K Ltd	WEEE	1,045
Wiltshire	Landfill	Parkgate Farm Hazardous Waste Landfill	Asbestos	1,883
Walsall	Transfer	Brownhills Environmental Management Facility	combination of other waste types (sub 100 tonnes)	251
	Treatment	Triple R Solutions Ltd	Lead batteries	195
	Storage	Walsall Oil Treatment Plant	machining emulsions and solutions free of halogens	939
Warwickshire	Treatment	CSG Coventry Treatment Plant	Emulsions	845
	Landfill	Cross Hands Quarry Landfill Site	Haz CDEW	317

[3] WPAs with sites receiving Gloucestershire hazardous waste in quantities of <100t have been excluded

Swindon	Treatment	Swindon Clinical Waste Transfer and Treatment Facility	Infectious Waste	496
	MRS	Swindon Metal Recycling Limited	ELVs	336
Salford	Treatment	CSG Lanstar (Cadishead)	Liquid Waste	720
South Gloucestershire	Transfer	Safetykleen U K	combination of other waste types (sub 100 tonnes)	548
Cambridgeshire		Vetspeed, Thriplow	Infectious Waste	264
Derbyshire	Treatment	Mepal Soil and Waste Treatment Centre	Haz CDEW	150
Staffordshire		Ilkeston Waste Treatment and Transfer Facility	sodium and potassium hydroxide	402
Nottinghamshire		Stoke Waste Treatment & Transfer Facility	Acid waste	283
Telford and Wrekin		Bilsthorpe Oil Treatment Plant	Oil	262
Nottingham City	MRS	AO Recycling Telford	WEEE	232
Dorset	Treatment	Harrimans Lane	WEEE	228
Oxfordshire	Transfer	Shaftesbury Oil and Water	Oil	208
Tameside	Treatment	Ewelme Hazardous Waste Transfer Station	combination of other waste types (sub 100 tonnes)	199
Plymouth		Manchester Fuel Services	Oil	183
		SYLOC Waste Treatment Facility	Liquid waste	163

Table 3 shows the following:

- The separate waste stream specific report for hazardous waste found of the c74,000 tonnes of hazardous waste produced in Gloucestershire in 2021, 63% was exported. Table 3 shows this was primarily managed through 41 sites hosted by 23 WPAs.
- Table 3 also shows the four dominant flows were hazardous C, D & E waste, bituminous waste, solid waste going for treatment and oily water from oil/water separators for transfer.

3.4 Gloucestershire Inert Waste Destinations

The principal destination WPAs receiving inert waste from Gloucestershire are shown in Table 4 below.

Table 4: Destination sites for Gloucestershire Inert Waste exports c10,000t or more in 2021

Source: WDI 2021

Facility WPA	Facility Type	Site Name	Principal Waste Type 10,000t or more	Total
South Gloucestershire	Physical Treatment	Tytherington Soil And Aggregate Treatment Facility	Non-hazardous Bituminous waste	23,245
Wiltshire	Mobile Plant	Park Grounds Farm	Mixed C & D waste	13,410
North Somerset	Inert LF	Durnford Quarry	Soils and Stones	12,658
Worcestershire	Physical Treatment	The Yard, Long Lane	Concrete, bricks, tiles and ceramics	11,562

Table 4 shows the following:

- The separate waste stream specific report for C, D & E waste found of the c834,500 tonnes of inert waste produced in Gloucestershire in 2021, 7% was exported and this

was primarily managed through 4 sites hosted by 4 different WPAs as shown in Table 4.

3.5 Gloucestershire Non-Inert Waste Destinations

The principal destination WPAs receiving non-inert waste from Gloucestershire are shown in Table 5 below.

Table 5: Destination sites for Gloucestershire Non-Inert Waste exports 5,000t or more in rank order

Source: WDI 2021

Facility WPA	Facility Type	Site Name	Principal Waste Type 5,000t or more	Total
Nottinghamshire	Treatment	Bunny Hill	Bottom ash and slag	17,327
Wiltshire	Material Recycling Facility	Kingsmill Recycling Centre	Materials unsuitable for consumption from food preparation.	14,813
	Composting	Parkgate Farm Composting Facility	Green waste	10,715
	Physical Treatment	Northend Farm Works	Concrete and concrete sludge	7,920
	Biological Treatment	Trowbridge S T W	Sludges from waste water treatment	5,424
	Composting	Park Grounds Farm	Wood	5,015
Bristol City	Physical-Chemical Treatment	Andersons Waste Treatment Centre	Liquid waste	13,976
	Metal Recycling	Sims Avonmouth	Ferrous metal	13,734
	Biological Treatment	Bristol Sewage Treatment Works	Sludges from waste water treatment	8,285
	Municipal Waste Incinerator	Severn Road Resource Recovery Centre	Sorting residues	7,351
Somerset	Biological Treatment	Swang Farm AD	Biodegradable kitchen and canteen waste	14,597
Swindon	Biological Treatment	Swindon S T W	Sludges from waste water treatment	11,246
Leicestershire	Treatment	Wanlip Sewage Treatment Plant	Landfill leachate	10,657
Derbyshire	Physical Treatment	The Midlands Urban Mine	Bottom ash and slag	10,616
Birmingham City	Haz Waste Transfer	Landor Street IRRC	Mixed municipal waste	7,845
South Gloucestershire	Non-Hazardous LF	Shortwood Quarry Landfill Site	Sorting residues	7,766
Leicester City	Material Recycling Facility	Casepak Material Recycling Facility	Mixed municipal waste	7,525
Hertfordshire	Recovery of Waste	Wallace Way Metal Recycling Facility	Ferrous metal	6,620
Solihull	Physical Treatment	Berkswell Estate Wood Waste Facility	Wood	5,219

Table 5 shows the following:

- The separate waste stream specific report for C&I waste found of the c348,500 tonnes of non-inert waste produced in Gloucestershire in 2021 44% was exported and was primarily managed at 19 sites hosted by 12 different WPAs.

- The four dominant flows were bottom ash and slag for treatment, materials unsuitable for consumption to MRF, biodegradable kitchen and canteen waste for biological treatment and liquid waste for physical-chemical treatment.
- Of the 19 sites, 5 sites hosted smaller tonnages of mixed municipal waste, metals and wood hosted by 5 WPAs.

4. Summary

A total of 62 sites have been identified as receiving what may be regarded as strategically significant quantities of waste from Gloucestershire in 2021. These were spread across 31 WPA areas.

In addition, analysis of data for 2019 and 2020 indicates a further 9 WPAs received waste in excess of the thresholds. These are shown in Appendix 1.

All the host WPAs ought to be contacted to confirm the following:

1. Whether the facilities identified as receiving waste are still operational given the dataset is for 2021. It should be noted that facilities identified as Recovery to Land[4] and Landfill will have a finite life. Most Recovery to Land facilities are likely to be operational for a few years only.
2. Any planning reasons that might mean the acceptance of wastes cannot continue, such as consent conditions and end dates; or if the site has been earmarked in Plans for redevelopment.
3. Whether the host WPA has any specific policies about providing for the management of waste that arises outside their respective Plan area.
4. Whether any Statements of Common Ground have been entered into with other WPAs concerning continued availability of capacity at the facility in question that might compromise continued access for Gloucestershire's waste.

The outcomes of the above engagement should be documented, and Statements of Common Ground sought with WPAs hosting facilities taking strategically significant quantities of waste for which ongoing access is to be relied upon during the Plan period as appropriate

[4] No Gloucestershire waste was found going to this type of facility in 2021

Appendix 1: Historical Cross Check: Destination WPA's of Hazardous, Non-inert and Inert Waste exports from Gloucestershire applying thresholds 2019-2021.

Highlighted cells: Orange - additional WPAs receiving strategically significant waste from Gloucestershire in 2019 and/or 2020
Green – WPAs receiving strategically significant waste from Gloucestershire

Source: WDI 2019, 2020 & 2021

Facility WPA	Hazardous[5]			Non-Inert			Inert		
	2019	2020	2021	2019	2020	2021	2019	2020	2021
Bedford	<100	160	<100	<5,000	<5,000	<5,000	<10,000	0	0
Birmingham City	<100	<100	<100	10,456	14,010	12,543	<10,000	<10,000	<10,000
Bristol City	2,993	2,138	3,089	60,402	68,814	54,024	<10,000	<10,000	<10,000
Cambridgeshire	396	191	481	<5,000	<5,000	<5,000	0	0	<10,000
Coventry	962	0	0	<5,000	<5,000	<5,000	0	<10,000	0
Derbyshire	348	129	410	11,259	42,130	11,067	<10,000	0	<10,000
Devon	<100	598	0	<5,000	<5,000	<5,000	<10,000	<10,000	<10,000
Dorset	<100	<100	219	<5,000	<5,000	<5,000	0	0	0
Dudley	239	407	<100	<5,000	<5,000	<5,000	0	<10,000	<10,000
Essex	105	<100	<100	<5,000	<5,000	<5,000	<10,000	<10,000	0
Herefordshire	119	137	107	<5,000	<5,000	<5,000	<10,000	<10,000	<10,000
Hertfordshire	<100	<100	<100	<5,000	<5,000	9,964	0	0	<10,000
Kent	<100	<100	<100	<5,000	6,377	<5,000	0	0	0
Leicester City	0	0	0	<5,000	<5,000	7,559	0	0	0
Leicestershire	229	153	100	5,859	15,332	10,678	<10,000	0	<10,000
Lincolnshire	<100	108	<100	7,960	<5,000	<5,000	<10,000	<10,000	<10,000
Liverpool	<100	190	0	0	<5,000	0	<10,000	0	0

[5] WPAs with sites receiving various quantities of sub 100t of hazardous waste from Gloucestershire have not been included.

Norfolk	<100	<100	<100	<5,000	8,650	9,063	0	<10,000	<10,000
North East Lincolnshire	<100	<100	298	<5,000	<5,000	0	0	0	<10,000
North Somerset	<100	<100	5,651	<5,000	<5,000	<5,000	<10,000	22,948	18,238
Northamptonshire	2,099	5,109	5,218	<5,000	<5,000	<5,000	<10,000	<10,000	<10,000
Nottingham City	1,587	134	230	<5,000	<5,000	<5,000	0	0	0
Nottinghamshire	1,039	569	266	<5,000	<5,000	17,466	<10,000	<10,000	<10,000
Oxfordshire	262	238	237	<5,000	<5,000	5,312	15,525	<10,000	<10,000
Plymouth	<100	<100	163	<5,000	<5,000	<5,000	0	0	0
Salford	1,478	949	802	<5,000	<5,000	<5,000	0	0	<10,000
Sandwell	2,693	2,192	3,815	31,085	22,781	6,362	<10,000	<10,000	<10,000
Solihull	0	0	0	9,885	6,255	5,983	0	<10,000	0
Somerset	<100	<100	<100	<5,000	<5,000	17,755	<10,000	<10,000	<10,000
South Gloucestershire	356	457	585	5,932	<5,000	8,502	97,157	<10,000	24,462
Staffordshire	1,539	831	402	<5,000	<5,000	<5,000	<10,000	<10,000	<10,000
Swindon	1,118	395	858	12,411	12,298	11,343	<10,000	<10,000	<10,000
Tameside	0	<100	183	0	0	<5,000	0	0	<10,000
Telford and Wrekin	551	345	233	<5,000	<5,000	<5,000	0	0	0
Wakefield	<100	<100	0	0	0	<5,000	9,626	11,260	10,496
Walsall	1,210	1,262	1,458	<5,000	<5,000	<5,000	<10,000	<10,000	<10,000
Waltham Forest	112	0	0	0	0	0	0	0	<10,000
Warwickshire	990	863	1,186	<5,000	<5,000	<5,000	<10,000	<10,000	<10,000
Wiltshire	2,938	1,910	1,909	46,848	44,089	50,120	51,717	13,081	24,033
Wolverhampton	731	846	13,345	<5,000	<5,000	<5,000	0	0	0
Worcestershire	3,589	3,447	3,880	35,135	<5,000	<5,000	11,732	15,364	24,844