Statement of Common Ground

Between Surrey County Council, Hampshire County Council and the South Downs National Park Authority

Concerning Strategic Policies for Waste Management

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1.0 Introduction and parties involved

1.1 National policy\(^1\) states that: “Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.” and “Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans.”

1.2 National policy\(^2\) expects that Local Plans will include ‘non-strategic’ and ‘strategic’ policies, and explains that strategic policies should: “...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” and “wastewater”.

1.3 National Policy states: “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.”

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\(^{1}\) Paragraph 24 and 25 of the revised National Planning Policy Framework July 2018

\(^{2}\) Paragraph 20 of the revised National Planning Policy Framework July 2018

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1.4 This document represents a **Statement of Common Ground between Surrey County Council (SCC), Hampshire County Council (HCC) and the South Downs National Park Authority (SDNPA)** and concerns the strategic matter of waste management and helps ensure that sufficient waste management capacity is planned for in each area.

1.5 SCC and HCC are waste planning authorities in the south east of England (See Figure 1) with responsibility for planning for the future management of waste in their areas by including relevant strategic policies in the following Local Plans:
   - Surrey Waste Plan (adopted 2008)

1.6 SCC is currently updating its planning policies on waste management by preparing the Surrey Waste Local Plan (plan period to 2033) and HCC has recently undertaken a review of its MWLP.

1.7 The SDNPA as waste planning authority plans jointly with the Hampshire Authorities. The SDNPA also undertakes joint planning for waste with East Sussex County Council, Brighton and Hove City Council, and West Sussex County Council on the following plans:
   - East Sussex, Brighton & Hove and South Downs Waste and Minerals Local Plan (adopted in 2013);
   - East Sussex, Brighton & Hove and South Downs Waste and Minerals Sites Plan (adopted in 2017), and;

1.8 The SDNPA plans for net self-sufficiency with its partner waste planning authorities on a Plan Area basis.

### 2.0 Signatories

2.1 This statement is agreed by SCC’s Cabinet Member for Environment and Transport, HCC’s Head of Strategic Planning and SDNP’s Planning Policy Manager.

Councillor Mike Goodman, Cabinet Member for Environment and Transport, Surrey County Council, 12 August 2019

Chris Murray, Head of Strategic Planning, Hampshire County Council, 13 August 2019

Lucy Howard, Planning Policy Manager, on behalf of the South Downs National Park Authority, 6 August 2019
3.0 Strategic Geography

3.1 Surrey, Hampshire and the South Downs National Park are nearby areas in the southeast of England, England (see Figure 1). There are good road connections, in particular the M25, M23, A24, A23 and M3. Waste management data shows that a proportion of waste produced in Surrey is managed in Hampshire and the National Park and a proportion of waste produced in Hampshire and the National Park is managed in Surrey – the movements between Surrey and Hampshire for the years 2015, 2016 and 2017 are set out in Appendix 1. This cross boundary movement is typical of the way in which waste is managed, as it is subject to market forces, having no regard to administrative boundaries. This is recognised in 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;”

3.2 Movements of waste also take place between Surrey, Hampshire, the National Park and other counties and areas.

Figure 1: Location of Surrey, Hampshire and the South Downs National Park
4.0 Strategic Matters

Net self sufficiency

4.1 Net self-sufficiency is a principle generally applied to waste planning that means an authority will plan for waste management facilities with sufficient capacity to manage an amount of waste that is equivalent to the amount predicted to arise within its area (irrespective of imports and exports). This helps ensure that sufficient waste management capacity is provided consistent with National Planning Policy for Waste.

4.2 The approach of net self-sufficiency in the south east was originally set out in the South East Plan and is now included in a Memorandum of Understanding\(^3\) between SCC, HCC, SDNP and other waste planning authorities in the South East which includes the following:

“The Parties recognise that there will be a degree of cross-boundary movement of waste. In light of this, the Parties will plan on the basis of net self-sufficiency which assumes that within each waste local plan area the planning authority or authorities will plan for the management of an amount of waste which is equivalent to the amount arising in that plan area. All parties accept that when using this principle to test policy, it may not be possible to meet this requirement in full, particularly for hazardous and other specialist waste streams.”

4.3 This approach is taken by HCC in its adopted Minerals and Waste Local Plan, by SDNPA (together with East Sussex County Council and Brighton & Hove City Council) in the adopted East Sussex Brighton & Hove and South Downs Minerals and Waste Local Plan and also by SDNPA (together with West Sussex County Council) in the adopted West Sussex Waste Local Plan. The approach is also taken by SCC in the adopted Surrey Waste Plan (2008) and the emerging Surrey Waste Local Plan. These plans provide for the development of facilities that will manage waste produced within, and beyond, each area based on net self-sufficiency and in accordance with the waste hierarchy. Application of the waste hierarchy in determining waste capacity requirements ensures that waste is managed in the following order of preference:

Most sustainable
1. Prepared for reuse;
2. Recycled and/or composted;
3. Recovered in ways other than recycling/composting;
4. Disposed.

Least sustainable

4.4 SCC, HCC and SDNPA recognise that the application of net self-sufficiency does not mean that an exact equivalent amount of waste, of the same type, will be transported in both directions between Surrey, Hampshire and the National Park. It is possible that

\(^3\) Memorandum of Understanding between the Waste Planning Authorities of the South East of England, April 2017

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particular commercial conditions exist which mean more waste is transported to one authority than the other. However net self-sufficiency means that such a situation would, in principle, be broadly balanced by movements between other authorities (including the areas of Hampshire, West Sussex and East Sussex not situated in the National Park).

4.5 Appendix 1 details reported movements of waste between Surrey and Hampshire. Each authority agrees that there are no planning reasons why these movements cannot continue in future subject to completion of certain landfills considered in the section below.

4.6 Currently more non-hazardous waste is exported from Surrey than is imported and a capacity gap therefore exists for recovery of residual waste. Policies, including the allocation of land for the management of waste, are included in the Surrey Waste Local Plan to address this matter. Hampshire County Council and the South Downs National Park Authority are planning for net self-sufficiency in accordance with the Plans mentioned above. In light of this neither SCC, HCC or SDNPA are specifically planning to meet the waste management needs of other areas but neither are they placing restrictions on development which constrain the origin of waste which may be managed by such development.

Non-Inert Waste Landfill

4.7 In Surrey there is only one non-inert landfill remaining at Patteson Court and this site has planning permission requiring restoration by 2030. In Hampshire there is only one remaining landfill site and this is a non-hazardous waste landfill at Blue Haze. Previous planning permission required the landfill site to be completed and restored by March 2020. However, very recent (April 2019) planning permission has been granted to extend the landfill operations until 2029, with restoration needing to be complete by 2031. There are no non-inert waste landfills in the National Park and non-inert waste requiring management by disposal to landfill is therefore exported, including to Surrey.

4.8 The demand for non-inert waste landfill has declined markedly in recent years and this decline is likely to continue. No proposals for new sites (including proposals for allocations in waste local plans) have recently come forward in either Hampshire or Surrey. In light of this there are no allocated sites for landfill in the Surrey Waste Local Plan and there is only one such allocation in the Hampshire Minerals and Waste Local Plan, however proposals (including extensions or alterations of existing landfill sites) may come forward. The assessment of need for any new non-inert landfill would take account of whether there is already sufficient suitable capacity to deal with the residual waste. This assessment will take account of the fact that waste is transported increasingly long distances to landfill and so existing sites some distance away may be able to serve requirements in Surrey and Hampshire. This assessment will also need to consider impacts associated with vehicle movements.

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4 Planning permission granted subject to Section 106 agreements being transferred over to the new permission

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4.9 SCC, HCC and SDNPA are collaborating on a Joint Position Statement concerning Non-hazardous Waste Landfill in the South East that is being facilitated by the South East Waste Planning Advisory Group.

Safeguarding

4.10 Each authority seeks to safeguard waste management capacity in its own area through robust policies in their respective development plans on waste management. This means the plans of both parties include a presumption against granting permission for other forms of development which could result in reductions in physical or operational capacity (either by reductions in numbers and size of sites or by reduction in site throughput or restrictions on operation). Where development is proposed that would result in a reduction in capacity the need for that capacity in meeting the needs of other areas will be taken into account.

Green Belt

4.11 It is recognised that the prevalence of Green Belt within Surrey (as illustrated on Figure 1) presents a significant constraint and fewer opportunities may exist for the management of waste which are clearly consistent with national policy. Indeed, historic patterns of development suggest it is unlikely that the anticipated waste management needs of Surrey will be met without developing waste management facilities on Green Belt land. Allocations of land are therefore proposed in the Surrey Waste Local Plan within the Green Belt. As waste management is considered inappropriate development within Green Belt, any proposals will only be considered acceptable if ‘very special circumstances’ are shown to exist, which clearly outweigh the harm caused to the Green Belt by reason of inappropriateness and any other harm, such as the preservation of openness of Green Belt designated land. One such very special circumstance could be an inability of the waste to be practically managed in other locations within Surrey outside of the Green Belt or in neighbouring Waste Planning Authority areas such as Hampshire.

Areas of Outstanding Natural Beauty

4.12 An Area of Outstanding Natural Beauty is land protected by the Countryside and Rights of Way Act 2000. Surrey contains two Areas of Outstanding Natural Beauty, the Surrey Hills AONB and the High Weald AONB. Hampshire has three AONBs, the North Wessex Downs AONB, Cranbourne Chase AONB and Chichester Harbour AONB. The Countryside and Rights of Way Act (2000) sets out that local authorities must ensure that all decisions have regard for the purpose of conserving and enhancing the natural beauty of AONBs.

4.13 The presence AONBs within the areas of the parties to this SOCG is a constraint for the management of waste. Any proposal coming forward within the AONB should ensure that they have regard for the purpose of conserving and enhancing the natural beauty of the AONB in line with national and local policy. Proposals in Surrey or Hampshire

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5 See Surrey County Council Site Identification and Evaluation Report [January 2019]
6 This is consistent with paragraphs 143 and 144 of the NPPF Statement of Common Ground Between Surrey County Council and Hampshire County Council Concerning Strategic Policies for Waste Management
for the management of waste that might otherwise need to be managed within an AONB in either authority area will be considered taking into account national policy on development within an AONB.

National Parks

4.14 National Parks are designated through the National Parks and Access to the Countryside Act 1949. The South Downs National Park is situated partly within Hampshire, and close to the boundary with Surrey. Hampshire also contains the New Forest National Park.

4.15 The development of major waste management facilities within National Parks is not encouraged by existing policy. Smaller scale waste development may be suitable in a National Park, in particular where it requires a countryside location or would serve a specific local need. Any proposal would be considered against the existing development plan, national policy and guidance.

5.0 Additional Strategic Matters

5.1 Common ground on other matters between SCC, HCC and SDNPA is set out in the Memorandum of Understanding between the Waste Planning Authorities of the South East of England, April 2017. This includes the following:

- Principle of planning for waste from London;
- implementation of the waste hierarchy;
- provision of capacity within waste local plans; and,
- recognition of waste industry influence on delivery of actual capacity.

5.2 SCC, HCC and SDNPA are also party to the following Joint Position Statements:

- Non-hazardous landfill in the South East of England (currently being prepared)
- Permanent Deposit of Inert Waste to Land in the South East of England (currently being prepared)

6.0 Cooperation Activities

6.1 Activities undertaken when in the process of addressing the strategic cross-boundary matter of waste management, whilst cooperating, are summarised as follows:

- Input to draft proposals for planning policy concerning waste management in each other’s area;
- membership of the South East Waste Planning Advisory Group and signatories to related joint MoU and joint position statements; and,
- ad-hoc exchange of information (via correspondence and meetings) related to the monitoring of waste movements and management capacity

7.0 Governance and Future Arrangements
7.1 The parties to this Statement have worked together in an ongoing and constructive manner. SCC, HCC and SDNPA will continue to cooperate and work together in a meaningful way and on an ongoing basis to ensure the effective strategic planning of waste management. Appropriate officers of each Party to this Statement will liaise formally through correspondence and meetings as and when required (including via SEWPAG).

7.2 The parties will review this SoCG at least every 12 months and establish whether this SoCG requires updating. Specific matters likely to prompt updates of this SoCG include the following:

- Modifications to the Surrey Waste Local Plan resulting from its independent examination (anticipated in June/July 2019)
- Evidence which shows significant changes in the level of waste movements between the authorities.
Appendix 1 - Reported movements of waste between Surrey and Hampshire
Data was obtained from the WDI using the function *waste received*, and only strategic movements (according to the agreed 2014 SEWPAG thresholds) have been included. The City of Portsmouth and City of Southampton have not been included.

It is unclear exactly how much waste arising in the South Downs National Park is managed in Surrey because records of waste managed relate to the county of production, and not whether the waste was produced in the National Park. However, it is known that waste from Hampshire is managed in Surrey and so it is quite possible that a proportion of this waste was produced in the National Park.

**Household, Commercial & Industrial Waste (Source: Environment Agency Waste Data Interrogator)**
The figures shown are rounded to the nearest thousand tonnes.

<table>
<thead>
<tr>
<th>Facility WPA</th>
<th>Facility Name</th>
<th>Operator</th>
<th>Exports from Surrey to Hampshire</th>
<th>Exports from Hampshire to Surrey</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surrey</td>
<td>Slyfield Materials Recycling Facility</td>
<td>Chambers Runfold Plc</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Surrey</td>
<td>Oakleaf Farm EPR/GP33333DU</td>
<td>Drumcastle Limited</td>
<td>N/A</td>
<td>N/A</td>
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<tr>
<td>Surrey</td>
<td>Chertsey S T W</td>
<td>Thames Water Utilities Ltd</td>
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<td>N/A</td>
</tr>
<tr>
<td>Surrey</td>
<td>Farnham Sewage Treatment Works</td>
<td>Thames Water Utilities Ltd</td>
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<td>N/A</td>
</tr>
<tr>
<td>Surrey</td>
<td>Camberley Treatment Works</td>
<td>Viridor Waste (Thames) Ltd</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Surrey</td>
<td>Guildford Sewage Treatment Works</td>
<td>Thames Water Utility Ltd</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Surrey</td>
<td>Camberley Treatment Plant</td>
<td>Viridor Waste (Thames) Ltd</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Surrey</td>
<td>Redhill Landfill (NEQ) EPR/BU8126IY</td>
<td>Biffa Waste Services Ltd</td>
<td>N/A</td>
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</table>
### Inert Waste (Source: Environment Agency Waste Data Interrogator)
The figures shown are rounded to the nearest 1,000 tonnes.

<table>
<thead>
<tr>
<th>Facility Name</th>
<th>Operator</th>
<th>Exports from Surrey to Hampshire</th>
<th>Exports from Hampshire to Surrey</th>
</tr>
</thead>
<tbody>
<tr>
<td>Homefield Sandpit</td>
<td>Chambers Runfold Plc</td>
<td>48,000</td>
<td>49,000</td>
</tr>
<tr>
<td>Stock Farm Quarry (Churt) Landfill Site</td>
<td>T J Environmental Limited</td>
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<td>N/A</td>
</tr>
<tr>
<td>Runfold South Landfill Areas A and C EPR/SP3131GC</td>
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<td>N/A</td>
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<tr>
<td>Homefield Landfill Site</td>
<td>Chambers Runfold PLC</td>
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</tr>
<tr>
<td>Slyfield Materials Recycling Facility</td>
<td>Chambers Waste Management</td>
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<td>N/A</td>
</tr>
<tr>
<td>Eversley Quarry</td>
<td>Cemex UK Materials Ltd</td>
<td>1,000</td>
<td>1,000</td>
</tr>
</tbody>
</table>
### Hampshire Hollybush Lane Waste Transfer Station & Recycling Facility
- **Operator**: Chambers Waste Management Plc
- **Exports from Surrey to Hampshire**:
  - 2015: N/A
  - 2016: N/A
  - 2017: N/A
- **Exports from Hampshire to Surrey**:
  - 2015: N/A

### Hampshire Forest Lodge
- **Operator**: Commercial Storage Limited
- **Exports from Surrey to Hampshire**:
  - 2015: N/A
  - 2016: 14,000
  - 2017: 25,000
- **Exports from Hampshire to Surrey**:
  - 2015: N/A
  - 2016: N/A
  - 2017: N/A

### Hampshire Aldershot Recycling Facility
- **Operator**: R Collard Limited
- **Exports from Surrey to Hampshire**:
  - 2015: 1,300
  - 2016: 6,000
  - 2017: 10,000
- **Exports from Hampshire to Surrey**:
  - 2015: N/A
  - 2016: N/A
  - 2017: N/A

### Hampshire Warren Heath Recycling Facility
- **Operator**: R Collard Limited
- **Exports from Surrey to Hampshire**:
  - 2015: 22,000
  - 2016: 50,000
  - 2017: 43,000
- **Exports from Hampshire to Surrey**:
  - 2015: N/A
  - 2016: N/A
  - 2017: N/A

### Hampshire Eversley Haulage Park
- **Operator**: R Collard Limited
- **Exports from Surrey to Hampshire**:
  - 2015: 20,000
  - 2016: 20,000
  - 2017: 22,000
- **Exports from Hampshire to Surrey**:
  - 2015: N/A
  - 2016: N/A
  - 2017: N/A

### Hampshire 1a Hollybush Industrial Park
- **Operator**: Shorts Group Limited
- **Exports from Surrey to Hampshire**:
  - 2015: 5,000
  - 2016: 9,000
  - 2017: 10,000
- **Exports from Hampshire to Surrey**:
  - 2015: N/A
  - 2016: N/A
  - 2017: N/A

### Hampshire Lynchford Lane Materials Recycling Facility
- **Operator**: Taurus Waste Recycling Ltd
- **Exports from Surrey to Hampshire**:
  - 2015: 33,000
  - 2016: 31,000
  - 2017: 27,000
- **Exports from Hampshire to Surrey**:
  - 2015: N/A
  - 2016: N/A
  - 2017: N/A

### Hampshire Calf Lane Quarry, Odiham
- **Operator**: CG Comley & Sons
- **Exports from Surrey to Hampshire**:
  - 2015: 5,000
  - 2016: 6,000
  - 2017: 5,000
- **Exports from Hampshire to Surrey**:
  - 2015: N/A
  - 2016: N/A
  - 2017: N/A

### Hampshire Park Dairy Farm – recycling site
- **Operator**: Williams of Bordon Limited
- **Exports from Surrey to Hampshire**:
  - 2015: 11,000
  - 2016: 13,000
  - 2017: 5,000
- **Exports from Hampshire to Surrey**:
  - 2015: N/A
  - 2016: N/A
  - 2017: N/A

### Hampshire Chandlers Farm
- **Operator**: Cemex UK Materials Ltd
- **Exports from Surrey to Hampshire**:
  - 2015: N/A
  - 2016: 12,000
  - 2017: 6,000
- **Exports from Hampshire to Surrey**:
  - 2015: N/A
  - 2016: N/A
  - 2017: N/A

### Hampshire
- **Facility Name**: Camberley Treatment Plant
  - **Operator**: Viridor Waste (Thames) Ltd
  - **Exports from Surrey to Hampshire**:
    - 2015: N/A
    - 2016: N/A
    - 2017: N/A
  - **Exports from Hampshire to Surrey**:
    - 2015: 1,000
    - 2016: 2,000
    - 2017: 2,000

### Hampshire
- **Facility Name**: The Waste Transfer Yard, Liphook
  - **Operator**: A W B Recycling Limited
  - **Exports from Surrey to Hampshire**:
    - 2015: N/A
    - 2016: N/A
    - 2017: 100
  - **Exports from Hampshire to Surrey**:
    - 2015: N/A
    - 2016: N/A
    - 2017: N/A

### Hampshire
- **Facility Name**: CSG Botley Treatment Plant
  - **Operator**: Cleansing Service Group Ltd
  - **Exports from Surrey to Hampshire**:
    - 2015: 300
    - 2016: 400
    - 2017: 400
  - **Exports from Hampshire to Surrey**:
    - 2015: N/A
    - 2016: N/A
    - 2017: N/A

### Hampshire
- **Facility Name**: Four Dells Waste Facility EPR/JP3890VC
  - **Operator**: Hazardous Waste Management Ltd
  - **Exports from Surrey to Hampshire**:
    - 2015: N/A
    - 2016: 0
    - 2017: 600
  - **Exports from Hampshire to Surrey**:
    - 2015: N/A
    - 2016: N/A
    - 2017: N/A

### Hampshire
- **Facility Name**: Whitehouse Farm Transfer Station
  - **Operator**: John Stacey & Sons Limited
  - **Exports from Surrey to Hampshire**:
    - 2015: 0
    - 2016: 0
    - 2017: 300
  - **Exports from Hampshire to Surrey**:
    - 2015: N/A
    - 2016: N/A
    - 2017: N/A

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**Hazardous Waste (Source: Environment Agency Waste Data Interrogator)**
The figures shown are rounded to the nearest 100 tonnes.
### Hazardous Waste (Source: Environment Agency Hazardous Waste Data Interrogator)

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<table>
<thead>
<tr>
<th>Facility WPA</th>
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<th>Operator</th>
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<th>Exports from Hampshire to Surrey</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>Marchwood Treatment Centre</td>
<td>Veolia ES (UK) Limited</td>
<td>N/A</td>
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<tr>
<td></td>
<td>Ring and Bring</td>
<td>David Nichols</td>
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<td></td>
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Hampshire

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