



Proposed Submission West London Waste Plan

Construction, Demolition & Excavation Waste Arising in West London to 2041

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Purpose

- 1.1 The report updates the forecast of Construction, Demolition and Excavation (C, D & E) estimated to be produced in west London during the period of the Proposed Submission West London Waste Plan (WLWP) and forms part of the evidence base of the Plan.
- 1.2 For the purpose of this exercise west London is taken to comprise the following London Boroughs:
- Brent;
 - Ealing;
 - Harrow;
 - Hillingdon;
 - Hounslow; and
 - Richmond Upon Thames;
- (hereinafter referred to as "the West London Boroughs").

The Old Oak & Park Royal Development Corporation (OPDC) is also party to the Plan, but given it is not separately identified in the data sources accessed, sites that fall within its ambit have been assessed under the relevant host Borough i.e. LB Brent and LB Ealing.

Principal Data Sources

- 1.3 The principal data source used to generate this C, D & E waste baseline update is listed below:

Waste Data Interrogator

- 1.4 Operators of all sites subject to Environmental Permits relating to the management of waste in England are required to submit returns to the Environment Agency (EA). These returns set out the quantities, types and origin of waste received and, where applicable, destination and fate of waste removed across a calendar year. These returns are collated by the EA and reported in a national dataset known as the Waste Data Interrogator (WDI). The WDI is released approximately nine months after the end of the calendar year to which the data relates. The WDI for the calendar year 2023(version 1 released September 2024), was the most current version available at the time this assessment was originally produced in November 2024.

Advice on Data

- 1.5 The principal source of advice with respect to the use of data to inform production of a plan evidence base is the national Planning Practice Guidance (PPG)¹. This states that:
"Assessing waste management needs for Local Plan making is likely to involve:
- *understanding waste arisings from within the planning authority area, including imports and exports*
 - *identifying the waste management capacity gaps in total and by particular waste streams*
 - *forecasting the waste arisings both at the end of the period that is being planned for and interim dates*
 - *assessing the waste management capacity required to deal with forecast arisings at the interim dates and end of the plan period."*

Paragraph: 022 Reference ID: 28-022-20141016

- 1.6 The PPG includes a section entitled " Using data to monitor and forecast waste needs", which articulates the following principles should waste planning authorities adopt when using data to plan for waste management:
- *Make clear assumptions on how data were handled, as well as their impact (including on forecasting)*
 - *Provide data to an appropriate level of significance, based on their explicit assumptions. In practice, data quoted to more than 2 or 3 significant figures will not be helpful and spurious accuracy stemming from precise figures should be avoided*
 - *Plan for a range of each type of waste rather than a specific single figure."*

Paragraph: 036 Reference ID: 28-036-20141016 Revision date: 16 10 2014

Data Presentation

- 1.7 In order to respect the need to avoid "spurious accuracy", the following approach has been taken:
1. actual tonnage data accessed has been used in the computations.
 2. where data has been subject to computation, this is included to 3 significant figures.
 3. where percentages have been used to generate data, the percentages are presented as whole numbers, however the computations actually use the full value. This means that values presented may not always precisely correspond to the values computed when applying the percentage value presented in this report.
 4. final values discussed in the text are rounded to the nearest 500.

¹ available at <https://www.gov.uk/guidance/waste>

Methodology

- 1.8 Table 1 shows C, D & E waste arisings reported as coming from the West London Boroughs in WDI 2023 aggregated by waste type².

Table 1: C, D & E Waste arisings from West London in 2023

Source: WDI 2023 (Environment Agency)

Category	Type	Tonnes
C&D	Inert	139,941
	Non-inert	173,791
	Hazardous	583
Excavation	Inert	1,631,965
	Non-inert	486 ³
	Hazardous	1,569
Total C, D & E waste		1,948,336

- 1.9 Table 1 shows a total of c1,948,500 tonnes of C, D & E waste reported as having been produced in west London as a whole in 2023.
- 1.10 As arisings of hazardous waste are addressed in a separate report⁴, the hazardous component of each waste type has been excluded from the management profile and forecasts sections. This results in the arising value for non-hazardous C, D & E waste⁵ reported as coming from west London of just under 2 million tonnes (c1,946,000 tonnes) in 2023.

² Includes Chapter 17 waste codes, EWC 19 13 03, 19 12 09 and 20 02 02.

³ Made up of c500 tonnes of 19 13 03 (remediated soils).

⁴ *West London Hazardous Waste Forecasts to 2041* BPP Consulting (July 2026).

⁵ The term "non-hazardous C, D & E waste" encompasses all C, D & E waste that isn't hazardous i.e. that which is inert plus that which is non-inert and not hazardous.

Profiling the C, D & E Waste Management Methods

1.11 The management routes for non-hazardous C, D & E waste⁶ arisings attributed to the West London boroughs in the WDI in 2023 is set out in Table 2 below.

Table 2: Non-hazardous C, D & E Waste attributed to West London Management Profile 2023

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D	Inert	45,753	0	61,391	32,797	0
	Non-inert	46,912	3,630	321	122,928	0
	Subtotal C&D	92,665	3,630	61,712	155,725	0
Excavation	Inert	105,448	58,601	1,183,022 ⁷	280,581	4,312
	Non-inert	0	105	381	0	0
	Subtotal C&D	105,448	58,706	1,183,404	280,581	4,312

The tonnes shown in Table 2 converts to the percentages shown in Table 3.

Table 3: Non-hazardous C, D & E Waste attributed to West London Management Profile 2023

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D	Inert	14%	0%	19%	11%	0%
	Non-inert	15%	1%	<1%	39%	0%
	Subtotal C&D	29%	1%	<20%	50%	0%
Excavation	Inert	6%	76% ⁸	0%	17%	<1%
	Non-inert	0%	<1%	<1%	0%	0%
	Subtotal C&D	6%	76%	<1%	17%	<1%

1.12 The management profile for non-hazardous C&D waste is as set out below:

- 29% was managed at recycling facilities;
- 1% was recovered (either through incineration or recovery to land);
- Just under 20% was managed at permitted landfills (predominantly inert probably for use in restoration or operational needs); and
- 50% was managed at intermediate sites prior to going on to its final fate (transferred).

1.13 The management profile for non-hazardous excavation waste is as set out below:

- 6% was managed at recycling facilities;
- 76% was recovered (through recovery to land and use in non-inert landfill);
- <1% was managed at permitted landfills (taken to be disposed);
- 17% was managed at intermediate sites prior to going on to its final fate (transferred); and
- <1% was managed via mobile plant (normally for recycling or reuse).

⁶ The term "non-hazardous C, D & E waste" encompasses all C, D & E waste that isn't hazardous i.e. that which is inert plus that which is non-inert and not hazardous.

⁷ As this tonnage is inert, and void at non-hazardous landfill will be conserved for non-inert waste and hence inert input minimised, it is assumed to be used for restoration or operational purposes and therefore classed as recovery. For this reason, it is counted within the recovery % in the profile in Table 3.

⁸ Including proportion of inert sent to landfill as per footnote 7 above.

Forecasting West London C, D & E Waste

- 1.14 In order to discern any trends in west London C, D & E waste arisings and to establish robust forecasts, historical values for C, D & E waste arisings from 2020 to 2023 are displayed in Tables 4 and 5 below.

Table 4: Non-hazardous C, D & E Waste arisings from west London 2020-2023

Source: WDI (Environment Agency)

	Waste Type	2020	2021	2022	2023	Mean Value
C&D	Inert	411,140	400,120	213,901	139,941	291,276
	Non-inert	171,280	183,497	198,084	173,791	181,663
Excavation	Inert	681,813	806,630	1,313,080	1,631,965	1,108,372
	Non-inert	550	1,613	9,550	486	3,050
Total Non-Hazardous C, D & E waste		1,264,783	1,391,860	1,734,615	1,946,184	1,584,361
Growth Rate p.a		-	+10%	+25%	+12%	+16%

- 1.15 Table 4 shows that overall C, D & E waste arisings reported as coming from west London have increased over the 4-year period. The rate of growth has fluctuated significantly between each year with an increase of 10% 2020- 2021 followed by 25% 2021-2022 before reducing to 12% increase 2022-2023, with an annual average growth rate of 16% over the period. Although C, D & E waste arisings have increased overall, there is a high variability of the growth in arisings by waste type, for example inert construction and demolition waste has fallen consistently while inert excavation waste has risen significantly over the same period.
- 1.16 Given the variability of the growth in arisings by waste type over the 4-year period, an average (mean) of the arisings of each waste type has been taken as a baseline to project forward to the end of the Plan period. This smooths out the peaks and troughs of annual datapoints. This is presented in Table 5 below.

Table 5: 2020-2023 Mean Non-hazardous C, D & E Waste arisings in West London by type

Category	Waste Type	Tonnes	
C&D	Inert	291,276	472,939
	Non-inert	181,663	
Excavation	Inert	1,108,372	1,111,422
	Non-inert	3,050	
Total C, D & E waste		1,584,361	

Table 5 shows that applying an average (mean) to the C, D & E waste arisings reported as coming from west London over the period 2020 to 2023 produces an arising value of c1.6M tonnes. This value has been used as a baseline to forecast from.

- 1.17 The PPG states when looking to forecast C, D & E waste:
- “Waste planning authorities should start from the basis that net arisings of construction and demolition waste will remain constant over time as there is likely to be a reduced evidence base on which forward projections can be based for construction and demolition wastes.”*

1.18 Hence the starting point for any assessment is that there will be no growth in arisings over the Plan period. This would simply project forward the values shown in Table 5 for the Plan period (to 2041). However, as a sensitivity, employment projections in the construction sector produced by the Greater London Authority (GLA)⁹ for the whole of London have been taken as a proxy for construction activity to generate an upper range forecast. This produces the forecast shown in Table 6 below.

Table 6: Forecast Non-hazardous C, D & E waste arisings for west London taking mean C, D & E waste arisings 2020-2023 applying growth rate from GLA sector employment projections

		2023 (values from Table 5)	2026	2031	2036	2041 ¹⁰
C&D	Inert	291,276	297,708	308,734	317,003	323,435
	Non-inert	181,663	185,675	192,552	197,709	201,721
Excavation	Inert	1,108,372	1,132,847	1,174,804	1,206,272	1,230,747
	Non-inert	3,050	3,117	3,233	3,319	3,387
Total C, D & E waste		1,584,361	1,619,347	1,679,322	1,724,304	1,759,290
Growth Rate p.a.			+0.74%	+0.74%	+0.54%	+0.41%

1.19 Table 6 shows that if waste arisings were to grow at the same rate as forecast construction sector employment, C, D & E waste arisings from west London might increase by c175,000 tonnes by 2041. However, it is considered that this is unlikely to be the case due to various factors driving down per unit waste production in construction. This includes:

- the increased segregation of materials at source to reduce onward management costs¹¹;
- the move to modular offsite fabrication reducing waste generation on each construction site - particularly when operating in space constrained sites such as those in urban areas like London; and,
- a sector initiative to drive towards Zero Avoidable Waste in Construction¹² to meet the Government's Resources and Waste Strategy (2018) stated ambition 'to eliminate avoidable waste of all kinds by 2050' in England, plus the residual waste reduction target adopted into law by *The Environmental Targets (Residual Waste) (England) Regulations 2023*.¹³

It should also be noted that employment numbers is not necessarily a reliable proxy for waste production. Nevertheless, while the sensitivity forecast is considered to be worst-case, it has been taken as a basis to plan future provision on in the WLWP.

⁹ <https://www.london.gov.uk/business-and-economy-publications/london-labour-market-projections-2017>

¹⁰ Extrapolating growth rate in 2036 through to 2041.

¹¹ For example, the need to separate plasterboard offcuts from other waste types going to landfill due the ban on landfilling plasterboard as a mixture.

¹² *The Routemap for Zero Avoidable Waste in Construction* <https://www.constructionleadershipcouncil.co.uk/wp-content/uploads/2021/07/ZAW-Interactive-Routemap FINAL.pdf>

¹³ <https://www.legislation.gov.uk/en/uksi/2023/92/made>

Accounting for waste reported for London as a whole

- 1.20 Data quality of the WDI relies on operators of permitted sites reporting inputs down to origin Waste Planning Authority (WPA) level. A number of sites do not report inputs to that level, preferring to report at regional level only i.e. to London only. This means that there is a potential for an underestimation of the tonnage of waste arising in west London that is not attributed below regional (London) level.
- 1.21 The WDI 2023 reports nearly 15 million tonnes of waste from London not attributed down to WPA level below London. The total tonnages are set out by type in Table 7 below:

Table 7: Totals of waste not attributed below London level received at permitted site in England

Source: WDI 2023

	Hazardous	Hhold/Ind/Com	C, D & E¹⁴	Grand Total
Tonnes Reported as Received	149,720	5,322,371	9,264,840	14,736,930

- 1.22 Given the substantial tonnage of waste to be attributed, an assessment has been undertaken to establish if an amount might reasonably be considered to arise from west London itself. Given HIC waste is subject to London Plan apportionments, and hazardous waste is also reported through the Environment Agency Hazardous Waste Interrogator (HWI), the focus of this exercise is on accounting for the C, D & E waste tonnage of c9.3 million not attributed below London level in the WDI 2023.
- 1.23 One approach taken to re-attribute these wastes is to consider the tonnages accepted at sites within each WPA, on the presumption that C, D & E waste will not travel far due to transport cost. However, given the compact nature of London (the inner city in particular) and WPAs that have few if any suitable waste management sites available, it is not considered appropriate to apply this approach in this case.
- 1.24 Given that the GLA data on employment in the construction sector has been used as a proxy for construction activity within the other London Boroughs for the purposes of forecasting arisings in the past, this dataset has been referenced to establish a proxy for allocating the arisings between Boroughs across London. Table 8 sets out the employment values for 2021, the most recent estimate available at the time this assessment was originally produced, with the Boroughs grouped according to the waste planning areas that exist.

¹⁴ Excluding EWC Chapter 01, 08, 15, and 16 and EWC code 19 12 05 included in the WDI definition of inert/C+D but not true C, D & E waste. Tonnages of these wastes have been reassigned to Hhold/Ind/Com.

Table 8: Construction Sector Employment Values*Source GLA Labour Data Statistics*

Borough	Employment n	Percentage (rounded)	Waste Plan Area
City of London	7,000	3.7%	Central London
Westminster	14,000	7.5%	
Tower Hamlets	5,000	2.7%	
Sub Total		13.9%	
Barking and Dagenham	4,000	2.1%	ELWP
Havering	8,000	4.3%	
Newham	8,000	4.3%	
Redbridge	6,000	3.2%	
Sub Total		13.9%	
Barnet	8,000	4.3%	NLWP
Camden	9,000	4.8%	
Enfield	8,000	4.3%	
Hackney	4,000	2.1%	
Haringey	3,500	1.9%	
Islington	5,000	2.7%	
Waltham Forest	4,500	2.4%	
Sub Total		22.4%	
Bexley	6,000	3.2%	SE London
Bromley	7,000	3.7%	
Greenwich	4,500	2.4%	
Southwark	4,000	2.1%	
Sub Total		11.5%	
Croydon	7,000	3.7%	SLWP
Kingston upon Thames	3,000	1.6%	
Merton	4,500	2.4%	
Sutton	6,000	3.2%	
Sub Total		10.9%	
Brent	7,000	3.7%	WLWP
Ealing	7,000	3.7%	
Harrow	6,000	3.2%	
Hillingdon	7,000	3.7%	
Hounslow	4,500	2.4%	
Richmond upon Thames	2,500	1.3%	
Sub Total		18.2%	
Hammersmith and Fulham	2,500	1.3%	Western Riverside
Kensington and Chelsea	2,250	1.2%	
Lambeth	5,000	2.7%	
Lewisham	3,000	1.6%	
Wandsworth	4,500	2.4%	
Sub Total		9.2%	
Grand Total	187,250	100.0%	

- 1.25 Applying the percentages shown in Table 8, to the unattributed C, D & E waste total of c9.3 million in Table 7, gives the attributed C, D & E tonnages of waste displayed in Table 9 below.

Table 9: Waste not attributed below London region, allocated across London sub-regions using Construction Sector Employment data as proxy (tonnes)

Source: Table 7 & Table 8

London Sub-region	Tonnes
Central London	1,286,440
East London	1,286,440
North London	2,078,095
South East London	1,063,787
South London	1,014,308
West London	1,682,267
Western Riverside	853,503
Total	9,264,840

- 1.26 Hence to ensure that the tonnage of waste not attributed below London is planned for i.e. not orphaned, it is proposed to add a further c1.7 million tonnes to the west London total to be provided for, as a sensitivity.

Composition of C, D & E waste reattributed to West London

- 1.27 In order to estimate the composition of unattributed C, D & E waste attributed to west London through the above exercise, and hence its suitability for particular management methods, the tonnages reported under C, D & E waste attributed to London as a whole have been allocated according to type between the C&D and excavation waste categories, with the values obtained then being converted into percentages as shown in Table 10 below.

Table 10: Allocation of Inert/ C+D Waste from Waste attributed to London as a whole

Source: WDI 2023

Category	Type	Percentage (rounded)
C&D	Inert	15%
	Non-inert	25%
Excavation	Inert	60%
	Non-inert	<1%

- 1.28 The percentages shown in Table 10 were then applied to the tonnage of non-hazardous C, D & E waste attributed to west London shown in Table 9 (1,682,267 tonnes) to generate the waste type profile shown in Table 11 overleaf.

Table 11: Estimated Composition of attributed Non-hazardous C, D & E waste from West London
Table 10 applied to Table 9 total

Category	Type	Tonnes
C&D	Inert	247,230
	Non-inert	414,453
Excavation	Inert	1,020,050
	Non-inert	534
Total		1,682,267

- 1.29 The waste by material type attributed to west London shown in Table 11 has been added to the mean C, D & E waste baseline from west London in Table 5 to produce a revised baseline shown in Table 12 below.

Table 12: Combined Non-hazardous C, D & E Waste Baseline arisings in West London including reattributed Waste from London as whole

Source: Table 5 plus Table 11

Category	Type	Tonnes	
C&D	Inert	538,506	1,134,622
	Non-inert	596,116	
Excavation	Inert	2,128,422	2,132,006
	Non-inert	3,584	
Total C, D & E waste		3,266,628	

- 1.30 Table 12 shows that when the tonnage of waste attributed to west London is added to the mean non-hazardous C, D & E waste arisings from west London over the period 2020 to 2023 a total arising value of c3.3M tonnes is generated. This is used as a starting baseline to forecast from.
- 1.31 The total arisings value compares with the 2012 arising estimate of c3.6 million tonnes generated in the evidence base of the adopted West London Waste Plan¹⁵. However, given the baseline values were generated using different methods it is considered that they are not directly comparable, and hence any growth trend indicated (in this case a fall of 0.78% p.a.) should not be given any substantive weight.

¹⁵ West London Waste Plan (July 2015).

1.32 Applying the upper range forecast discussed in paragraph 1.19 (on a worst case basis) to the combined C, D & E waste baseline arisings in west London including reattributed waste from London as whole, gives the forecast shown in Table 13 below.

Table 13: Forecast Non-hazardous C, D & E waste arisings for west London including re attributed tonnage taking mean C, D & E waste arisings 2020-2023 applying growth rate from GLA sector employment projections

		2023 (values from Table 12)	2026	2031	2036	2041 ¹⁶
C&D	Inert	538,506	562,461	599,467	617,977	637,059
	Non-inert	596,116	622,634	663,600	684,090	705,213
Subtotal C&D waste		1,134,622	1,185,095	1,263,067	1,302,067	1,342,272
Excavation	Inert	2,128,422	2,223,104	2,369,370	2,442,530	2,517,948
	Non-inert	3,584	3,743	3,989	4,113	4,240
Subtotal E waste		2,132,006	2,226,847	2,373,359	2,446,643	2,522,188
Total C, D & E waste		3,266,628	3,411,942	3,636,426	3,748,710	3,864,460

1.33 Table 13 shows that if waste arisings were to grow at the same rate as forecast construction sector employment, combined C, D & E waste arisings from west London might increase by c598,000 tonnes by 2041 in total with the following breakdown by stream:

- 1.34 C&D waste: 98,553t inert; 109,097t non-inert;
- Excavation waste: 443,526t inert; 656t non-inert.

Profiling the C, D & E waste attributed to West London

1.35 In order to estimate the management profile of C, D & E waste attributed to west London, the tonnages reported under C, D & E waste not attributed below London as a whole have been interrogated to arrive at the management profile shown in Table 14.

Table 14: Non-hazardous Inert/ C+D Waste from Waste from London as a whole by Waste Management Profile 2023

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D	Inert	12%	<1%	<1%	2%	0%
	Non-inert	12%	<1%	<1%	13%	0%
Excavation	Inert	15%	29% ¹⁷	0%	16%	<1%
	Non-inert	<1%	0%	<1%	0%	0%

1.36 Applying the percentages shown in Table 14 to the tonnage of non-hazardous C, D & E waste from London attributed to west London in Table 11 (1,682,267 tonnes) gives the management profile by tonnage shown in Table 15.

¹⁶ Extrapolating growth rate in 2036 through to 2041.

¹⁷ Includes tonnage to landfill as per footnote 7.

Table 15: Waste Management Profile of reattributed Non-hazardous C, D & E waste from London as a whole (tonnes)

Source: Table 14 + Table 11

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D	Inert	204,490	3,188	2,868	36,685	0
	Non-inert	195,611	32	448	218,362	0
Excavation	Inert	259,079	483,808	0	275,760	1,402
	Non-inert	132	0	402	0	0

Overall management profile for C, D & E waste attributed to West London

1.37 To establish a final management profile of total non-hazardous C, D & E waste arising in West London in 2023 (directly attributed to West London in WDI 2023 and attributed London C, D & E waste), the values in Table 15 have been combined with the tonnages attributed directly to West London (shown in Table 2) to produce the tonnages shown in Table 16.

Table 16: Combined Waste Management Profile of west London Waste including attributed Waste from London as a whole (tonnes)

Source: Table 2 + Table 15

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D	Inert	250,243	3,188	64,259	69,481	0
	Non-inert	242,523	3,662	768	341,291	0
	Subtotal C&D	492,765	6,850	65,028	410,772	0
Excavation	Inert	364,528	1,725,432	0	556,342	5,714
	Non-inert	132	0	783	0	0
	Subtotal Excavation	364,660	1,725,432	783	556,342	5,714

1.38 This produces the management profile by proportion shown in Table 17 below.

Table 17: Combined Non-hazardous C, D & E Waste attributed to West London Waste Management Profile 2023

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D	Inert	25%	<1%	7%	7%	0%
	Non-inert	25%	<1%	<1% ¹⁸	35%	0%
	Subtotal C&D	50%	1%	7%	42%	0%
Excavation	Inert	14%	65%	0%	21%	<1%
	Non-inert	<1%	0%	<1%	0%	0%
	Subtotal Excavation	14%	65%	<1%	21%	<1%

¹⁸ Does not include residues from processing of mixed skip waste classed under EWC code 19 12 12 that may be landfilled as inactive waste under the Landfill Tax regime but would not be classed as inert under environmental permitting.

- 1.39 To summarise, the management profile for non-hazardous C& D waste attributed to west London is as set out below:
- 50% was managed at recycling facilities;
 - 1% was recovered (either through incineration or recovery to land);
 - 7% was managed at permitted landfills (presumed disposed);
 - 42% was managed at intermediate sites and transferred on for recovery or disposal; and
- 1.40 none was managed via mobile plant (normally for recycling or reuse).
- 1.41 The management profile for non-hazardous excavation waste is as set out below:
- 14% was managed at recycling facilities;
 - 65% was recovered (through recovery to land and use in restoration/ backfilling on permitted landfills);
 - <1% was managed at permitted landfills (dredging spoil presumed disposed);
 - 21% was managed at intermediate sites and transferred on for recovery or disposal; and
 - <1% was managed via mobile plant (normally for recycling or reuse).
- 1.42 When the different categories of site are assigned by activity as shown in Table 18, performance against the London Plan target categories is indicated.

Table 18: Non-hazardous C, D & E Waste attributed to West London Combined Waste Management Profile 2023 as %

Reference Line from Table 17	Category	Activity	Recycling	Recovery	Landfill	Transfer	Mobile Plant	Total
Line 3	C&D	Recovery inc recycling	50%	1%	-	42%	0%	>93%
		Other	-	-	7% ¹⁹		-	<49%
Line 4	Inert Excavation	Recovery inc recycling	14%	65% ²⁰	0%	21%	<1%	>100%
		Other	-	-	-		-	<21%
Line 5	All Excavation	Recovery inc recycling	14%	65%	0%	21%	<1%	>100%
		Other	-	-	<1%		0%	<21%

- 1.43 To summarise the management profile for non-hazardous C& D waste managed at permitted facilities reporting through the WDI 2023 is as set out below:
- At least 51% was managed through recycling or recovery;
 - With 7% presumed disposed at permitted landfills; and
 - 42% transferred on for recovery or disposal.
- It should be noted that waste going for re-use may not be managed through permitted sites, plus a substantial amount of the fraction of C&D waste that constitutes hardcore may be managed

¹⁹ Does not include residues from processing of mixed skip waste classed under EWC code 19 12 12 (aka trommel fines) that may be landfilled as inactive waste under the Landfill Tax regime but would not be classed as inert under environmental permitting.

²⁰ Taken to be used for restoration or operational purposes which is classed as recovery.

on the site of production and converted into recycled aggregate either used on site or sold offsite²¹. Hence the recycled value of 51% should be taken to be a minimum 'at least' value.

- 1.44 The management profile for non-hazardous excavation waste is as set out below:
- At least 80% was managed through recycling or recovery (inc mobile plant);
 - With <1% presumed disposed at permitted landfills; and
 - 21% transferred on for recovery or disposal. Given that disposal would only be to landfill, and backfilling of mineral workings and other uses would be classed as recovery, it is considered highly unlikely that the inert fraction of this stream would actually end up being disposed of.
- 1.45 This performance compares with the following targets set in the London Plan for C, D & E waste generated in London in *Policy SI 7 Reducing waste and supporting the circular economy*:
- meet or exceed the targets for each of the following waste and material streams:
 - construction and demolition – 95 per cent reuse/recycling/recovery
 - excavation – 95 per cent beneficial use overall and 100% of inert excavation beneficially used.²²
- 1.46 It is, however, not possible to draw a firm conclusion around what this comparison may mean in terms of the adequacy of waste management capacity provision in west London as the performance data relates to a management profile in a single year, which may not reflect the capacity potential of the different waste management facilities in west London. Management capacity has been assessed in a separate report that forms part of the Plan evidence base²³.

²¹ Data provided by the National Federation of Demolition Contractors.

²² London Plan Footnote 164.

²³ Proposed Submission WLWP, *Assessment of Existing Capacity* BPP Consulting (July 2026)