



Proposed Submission West London Waste Plan

Hazardous Waste Arising in West London to 2041

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1. Purpose

- 1.1 The report presents the outcome of an assessment of hazardous waste estimated to be produced in west London using 2023 data and forecasts this forward for the period of the Proposed Submission West London Waste Plan (WLWP) to 2041, as part of the Plan evidence base. It should be noted that while the London Plan states at para 9.8.18:

“Hazardous waste makes up a component of all waste streams and is included in the apportionments for household, commercial and industrial waste set out in Table 9.2 ”

because these wastes generally have their own distinct management requirements, the arisings have been assessed separately.

- 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 WLWP, 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.

Principal Data Sources

- 1.3 The principal data sources used to prepare this report are listed below.

The Environment Agency Hazardous Waste Interrogator (HWI)

- 1.4 Legislation requires that the relevant waste regulation authority¹ be notified when hazardous waste is moved. The notification takes the form of a consignment note that details the quantities and destination of the waste. This means that the following movements of hazardous waste are recorded and reported to the relevant regulatory body:
- From producer sites directly to disposal/treatment facilities;
 - from producer sites to transfer facilities for bulking up and onward management; and,
 - from treatment facilities to final disposal sites.

This data is then aggregated by the Environment Agency and made available in the HWI that is published on an annual basis with a delay of c9 months.

¹ For England this is the Environment Agency.

The Environment Agency Waste Data Interrogator (WDI)

- 1.5 As the HWI dataset does not identify specific receiving sites, reference has also been made to the Environment Agency (EA) national dataset known as the Waste Data Interrogator (WDI). This consists of returns submitted by operators of all sites subject to Environmental Permits relating to the management of waste in England. 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 of producing this assessment.

Advice on Data

- 1.6 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 (nPPG) available at <https://www.gov.uk/guidance/waste>. 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

- 1.7 It includes a section entitled " Using data to monitor and forecast waste needs", which articulates the following principles for waste planning authorities to 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

1.8 In order to respect the need to avoid "spurious accuracy", the following approach has been taken:

1. where tonnage data has been accessed, this has been used in the computations.
2. where data has been subject to computation, this has been 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.

There can be some discrepancy between the coverage of each of the source datasets, so the tonnages displayed in Appendix 1 derived from the WDI do not necessarily match up with the tonnages shown in the body of this report derived from the HWI.

2. Methodology

- 2.1 Table 1 shows hazardous waste reported as coming from each West London Borough in 2023 through the HWI 2023.

Table 1: Hazardous Waste arisings from West London in 2023

Source: HWI 2023 (Environment Agency)

Borough	Tonnes
Brent	13,929 ²
Ealing	13,911
Harrow	1,728
Hillingdon	10,441
Hounslow	13,939
Richmond Upon Thames	2,789
Total	56,736

- 2.2 Table 1 shows a total of c56,500 tonnes of hazardous waste being produced in west London in 2023. This compares with a baseline of c37,500 tonnes for 2012 using the HWI reported in the 2014 report³. This indicates that arisings as reported by the HWI have increased by c50% over the eleven-year period, with an annual growth rate of c4.5%.
- 2.3 The principal types of hazardous waste reported as arising in west London in 2023 are presented in Table 2 below. The total value shown in Table 2 is significantly less than that obtained in Table 1 due to the adjustment for outputs of the Brent Oil Contractors site as per footnote 2. If that value is deducted from the total in Table 1 the revised total is reduced to 52,567 tonnes produced in 2023 with the total tonnage in Table 2 accounts for 90% of reported arisings.

Table 2: Principal Hazardous Waste Component Arisings in West London 2023

Source: HWI 2023 (Environment Agency)

Hazardous Waste Type/Source	2023
C, D & E Waste	22,721
Oil/Water Separator Waste	7,159
Infectious Clinical Waste	6,323
WEEE	5,499
Vehicle Maintenance & ELV depollution	4,018 ⁴
Drilling wastes	1,440
Liquid waste	254 ⁵
Total	47,415

² All the outputs (4,169t) of Brent Oil Contractors Ltd site located in Brent called Fourth Way WTF would be classified as hazardous waste arising in west London regardless of its source. Given none of the site inputs were reported to have arisen in west London (all as South East (WPA Not codeable)), tonnages of the principal outputs have been deducted from Table 2 as per footnote 4 and 5, the difference being tonnages of other wastes that each fell below the significance threshold.

³ *Estimate of Baseline, Forecast, Management & Flows for Hazardous Waste Arising in West London*, BPP Consulting (February 2014). The 2012 baseline was produced using a combined HWI/ WDI dataset so the value obtained is not directly comparable.

⁴ 2,576 tonnes deducted as per footnote 2.

⁵ 671 tonnes deducted as per footnote 2.

2.4 Table 2 shows that the five principal hazardous waste streams (which make up 90% of the total arisings)⁶ arose from construction activity, oil/ water separator cleaning, vehicle maintenance/ELV depollution, infectious clinical waste and Waste Electrical and Electronic Equipment (WEEE).

⁶ The remaining 10% is made up of 130 hazardous waste codes all received in tonnages of less than 500 tonnes.

3. Forecasting Hazardous Waste

3.1 The 2013 National Policy Statement for Hazardous Waste⁷ remains the most current statement of national policy on hazardous waste arisings in England at the time of writing. It states that arisings of hazardous waste are expected to increase for the following reasons:

- Continuing consumer demand for consumer durables containing hazardous materials.
- Increasing use of producer responsibility schemes, such as those provided for Waste Electrical and Electronic Equipment (WEEE) which require the separate collection of WEEE resulting in more hazardous items being collected separately as hazardous waste.
- Changes to the list of hazardous properties in the revised Waste Framework Directive and changes to the European Waste List, leading to increases in the amount of waste classed as 'hazardous'. There are still uses in which components that become hazardous waste may be unavoidable for the foreseeable future. For example, the use of oil in internal combustion engines.

3.2 The identification of persistent organic pollutant (POPs) bearing materials such as furniture and cable coatings may also lead to an increase in reported hazardous arisings. See for example, the Environment Agency's guidance on assessing furniture that might contain POPs.⁸

3.3 To discern possible trends, the data for hazardous waste arising in excess of 500 tonnes over the past 4 years reported through the HWI has been reviewed. This is presented in Table 3 below.

Table 3: Principal Hazardous Waste Component Arisings in West London 2020-2023

Source: HWI

Hazardous Waste Type/Source	2020	2021	2022	2023	Mean growth rate
C, D & E Waste	52,256	37,130	46,038	22,721	-18.53%
Oil/Water Separator Waste	8,028	6,443	6,292	7,159	-2.77%
Vehicle Maintenance inc ELV components ⁹	5,701	4,993	4,827	4,018	-10.84%
Infectious Clinical Waste	4,957	5,621	7,368	6,323	10.10%
WEEE	4,520	5,474	4,489	5,499	8.54%
Drilling wastes from mining activity	-	-	-	1,440	+100%
Liquid waste from industrial processes	520	555	739	254	-8.59%
Total	75,981	60,216	69,753	47,415	
		-20.75%	+15.84%	-32.02%	-12.31%

3.4 Table 3 shows that arisings of hazardous waste in west London have fluctuated across the 4-year period, decreasing from a peak in 2020 to 2021, rising in 2022 and then falling again in 2023. With an overall declining trend of minus 12.31% between 2020 and 2023.

⁷ National Policy Statement for Hazardous Waste: A framework document for planning decisions on nationally significant hazardous waste infrastructure Defra June 2013.

⁸ Environment Agency on GOV.UK website: Identify and classify waste containing persistent organic pollutants May 2025.

⁹ Value adjusted for Brent Oil Contractors Ltd site outputs as per footnote 2.

3.5 The five principal waste streams show annual fluctuations, with C, D & E waste showing the largest change of minus 18.53% over the period. Annual arisings of hazardous C, D & E waste will very much depend on construction activity, involving demolition of old building stock containing contaminated materials such as asbestos (banned from use since 1999), and the excavation of contaminated soils from historically contaminated sites such as petrol stations. To determine any trend, the principal component waste types that make up the total hazardous C, D & E waste arisings have been further analysed as shown in Table 4 below.

Table 4: Hazardous C, D & E Waste (2020-2023)

Source: HWI 2023

Hazardous C, D & E Waste Type	2020	2021	2022	2023	Av.growth rate
Soils and stones	30,322	31,371	36,974	15,072	-12.64%
General construction waste	13,644	3,810	6,456	2,493	-21.4%
Bituminous waste (highway maintenance)	7,415	1,949	2,609	4,013	+4.66%
Cables	0	0	0	1,143	+100%
Dredging spoil	875	0	<500	0	0
Total	52,256	37,130	46,038	22,721	
		-28.95%	23.99%	-50.65%	-18.53%

3.6 Table 4 shows that:

- i) the principal source of fluctuation in hazardous C, D & E waste was soils and stones and general construction waste. These arise principally from redevelopment of brownfield sites that are contaminated, and the demolition of existing building stock containing hazardous materials. While it is not possible to predict when such activity will take place on an annual basis, a peak value for both source C, D & E wastes has been taken as a worst-case baseline (c37,000 tonnes soils and stones and c13,500 tonnes general construction waste). It should be noted for the purposes of forecasting it can be reasonably expected that the amount of hazardous materials present; in the building stock, and, historically contaminated sites subject to redevelopment will decline over time.

- ii) Arisings of the other hazardous materials are variable. The following approach has been taken to setting baseline values:

3.7 the average value of bituminous waste arisings of c4,000 tonnes has been taken rather than a peak value, given the historical arisings have not seen as much annual fluctuation as soils and stones and general construction waste.

- cables have only appeared as hazardous in 2023. This is taken to be attributed to the categorisation of certain cable as hazardous by the EA due to the presence of PoPs in their coating. It is assumed that this will continue but should decline over time as the use of PoPs was phased out in 2019.
- A value for dredging spoil has not been taken forward as it is not a consistent arising.

3.8 Final baseline values to take forward for forecasting purposes are presented in Table 5 below.

Table 5: Final Hazardous Waste Baseline for west London

Source: HWI 2023

		Total	
Hazardous C, D & E Waste	Soils and stones	36,974	55,757
	General construction waste	13,644	
	Bituminous waste (highway maintenance)	3,996	
	Cables	1,143	
Oil/Water Separator Waste		7,159	
Vehicle Maintenance inc ELV components		4,018	
Infectious Clinical Waste		6,323	
WEEE		5,499	
Drilling wastes from mining activity		1,440	
Liquid waste from industrial processes		254	
Sub-Total		80,450	
Other wastes		9,321	
Total		89,772	

3.9 Table 5 shows a final hazardous waste baseline for west London from which to forecast of c90,000 tonnes. This value is comparable to the 2012 baseline value arrived at of c88,500 tonnes of hazardous waste arisings reported in the 2014 report.

4. Future waste arisings

- 4.1 As discussed in Section 3, while the 2013 National Policy Statement for Hazardous Waste¹⁰ considers that arisings of particular hazardous waste are expected to increase, it is considered that production of the hazardous wastes in west London will stabilise if not decline over time for the following reasons:
1. Regulations banning the use hazardous materials and components in consumer products mean that over time the quantity of hazardous material present in consumer products such as WEEE should decline.
 2. Hazardous materials such as asbestos and chromate treated wood bound up in the building stock will reduce as the use of such elements are replaced with non hazardous alternatives (substitution).
 3. The incidence of land contamination by industrial use will reduce due to stricter regulatory controls meaning that contaminated soil will only arise as a result of legacy sites which will decline over time as they are redeveloped and remediated.
 4. Electric vehicles accounted for 20% of new car sales in 2025, with a legally binding phase-out of new pure petrol/diesel car sales from 2030, and all non-zero-emission vehicles (including hybrids) from 2035¹¹.
- 4.2 Given the variability between arisings each year and the National Policy Statement for Hazardous Waste advice that hazardous waste is expected to increase in the short-term, but based on the assumptions above hazardous waste can be expected to stabilise over time, the following growth forecast is suggested on a waste stream basis:
- Hazardous C, D & E waste held constant to 2031 at c56,000 tonnes before applying a decreasing forecast of minus 18.53% per annum as per mean historic growth rate.
 - Oil/ water separator waste held constant over the Plan period given little change between 2020 and 2023.
- 4.3 Vehicle maintenance waste including ELV depollution arisings falling with the transition to electric vehicles. However, some of the current conventional vehicle stock will remain in use beyond 2035 and the gradual shift can be expected to depress growth in arisings. Therefore, this waste stream has been held constant to 2031 before applying a decreasing forecast of minus 10.84% per annum as per mean historic growth rate.
- Increasing infectious clinical waste at 10.1% per annum to 2031 as per mean historic growth rate before being held constant to 2041.
 - Increasing WEEE at 8.54% per annum as per mean historic growth rate to 2031 before being held constant to 2041.
- 4.4 The remaining other wastes have been held constant given they are likely to continue to arise and have fluctuated up and down historically. The growth forecasts based on these assumptions are presented in Table 6.

¹⁰ 3.2.2 The total amounts of hazardous waste remain significant and are expected to increase – National Policy Statement for Hazardous Waste, 2013.

¹¹ <https://www.gov.uk/government/news/pathway-for-zero-emission-vehicle-transition-by-2035-becomes-law>

Table 6: Forecast Hazardous Waste Arisings in West London
Source: Baseline Arisings discussion above

Hazardous Waste Type/Source	Plan Milestone Year				
	2023	2026	2031	2036	2041
Construction, Demolition & Excavation	55,757	55,757	55,757	20,008	7,180
Oil/Water Separator Waste	7,159	7,159	7,159	7,159	7,159
Vehicle Maintenance inc ELV	4,018	4,018	4,018	2,264	1,276
Infectious Clinical Waste	6,323	8,439	13,654	13,654	13,654
WEEE	5,499	7,032	10,593	10,593	10,593
<i>Subtotal</i>	<i>78,756</i>	<i>82,405</i>	<i>91,181</i>	<i>53,679</i>	<i>39,862</i>
Other wastes ¹²	11,015	11,015	11,015	11,015	11,015
Total Projected Arisings	89,772	93,420	102,196	64,694	50,877

- 4.5 Table 6 shows that applying the forecast assumptions results in an increase in the quantity of hazardous waste arisings in west London from c90,000 tonnes in 2023 rising to c102,000 tonnes in 2031, and then falling to 51,000 tonnes in 2041. The Waste Needs Assessment (WNA) 2014 forecast hazardous arisings to be c113,000 tonnes in 2031, this compares with the proposed forecast of c102,000 tonnes in 2031.

¹² Including the sub 100t waste types.

5. Profiling the Existing Hazardous Waste Management Methods

5.1 The management routes for hazardous waste arising in west London in 2023 is set out in Table 7 below using the fate categorisation used in the HWI.

Table 7: West London Hazardous Waste Management Routes 2023

Source: HWI 2023

Recycling	Recovery ¹³	EfW without recovery	Landfill ¹⁴	Transfer
24%	58%	2%	6%	10%

5.2 Table 7 shows that of the total hazardous waste produced in 2023:

- 24% was recycled;
- 58% was recovered;
- 2% was incinerated without energy recovery;
- 6% was landfilled; and
- 10% was transferred on for an undetermined final fate.

5.3 The fate of hazardous waste arising in west London outside west London has been assessed in the strategic waste flows report¹⁵. Appendix 1 identifies site specific information and the principal wastes managed related to the host WPA. Note that the WDI has been used to produce the table in Appendix 1 given the HWI does not report site specific details and therefore the arisings data shown in Appendix 1 may not align with that shown in Table 3.

¹³ Includes transfer for onward recovery. Recovery captures recycling and energy recovery amongst other activities.

¹⁴ Includes 737 tonnes rejected.

¹⁵ *West London Strategic Waste Flows Report* BPP Consulting July 2026.

Appendix 1: WPAs receiving over 500 tonnes of hazardous waste from West London in 2023 and the permitted site it is managed at (where known)

Source: WDI 2023. In rank order of receiving WPA (largest to smallest)

WPA	Site Category	Site Name	Site Operator	Waste Type	Tonnage
Hertfordshire	Treatment	North London Anaerobic Digestion Facility	Severn Trent Green Power (North London) Ltd	Grease and oil mixture from oil/ water separation	8,292
		Redbournbury Treatment Plant	Veolia ES (UK) Ltd	Oily water from oil/ water separators and wastes from grit chambers and oil/ water separators	3,487
		Maple Lodge WWTW	Syracuse Waste Ltd	oily water from oil/water separators	1,721
Kent	Treatment	Gas Road, Sittingbourne	Sweep Kuusakoski Ltd	WEEE	3,829
Surrey	Landfill	Redhill Landfill Site	Biffa Waste Services Ltd	Soils and stones	1,806
Buckinghamshire	MRS	Iver Recycling	Iver Recycling Ltd	ELVs	1,359
Suffolk	Treatment	Hollywell Waste Oil Treatment Facility	Slicker Recycling Ltd	Mineral-based non-chlorinated engine, gear and lubricating oils	557