



Proposed Submission West London Waste Plan

Assessment of Existing Waste Capacity in West London 2025

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Note to Reader

This report sets out the current evidence-based position on waste management capacity in west London. It updates and replaces the capacity assessment published alongside the Regulation 18 consultation on the draft updated WLWP (December 2025). In some cases it arrives at slightly different values for Plan area capacity to those set out in the Regulation 19 Proposed Submission WLWP (May 2026). For clarity, this is intentional and reflects the actual position. The revised capacity figures reflect changes to site-specific information arising from the consultation responses and other updated evidence available to the west London LPAs at the time of writing.

Abbreviations

Abbreviation	Term
CA	Civic Amenity
C & I	Commercial & Industrial Waste
C & D	Construction and Demolition Waste
DEFRA	Department for Environment, Food and Rural Affairs
DtC	Duty to Cooperate
EA	Environment Agency
EfW	Energy from Waste
EW	European Waste Catalogue
HIC	Household, Industrial and Commercial (waste)
HS2	High Speed 2
HWI	Hazardous Waste Interrogator
HWRC	Household Waste Recycling Centre
LACW	Local Authority Collected Waste
MRF	Material Recycling (Reclamation) Facility
MSW	Municipal Solid Waste (aka LACW)
nPPG	national Planning Practice Guidance
NPPW	National Planning Policy for Waste
OPDC	Old Oak & Park Royal Development Corporation
RDF	Refuse Derived Fuel
WDI	Waste Data Interrogator
WEEE	Waste Electrical and Electronic Equipment
WLWP	West London Waste Plan
WLWA	West London Waste Authority
WPA	Waste Planning Authority

Glossary of Terms

Term	Definition
Apportionment	The amount of household and commercial/industrial waste allocated to each London Borough to provide capacity to manage through The London Plan 2021.
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 data on waste management matters.
Environmental Permit	Permit issued by the Environment Agency authorising specific activities that may take place on a particular site involving certain types of waste within specified limits.
Existing waste site	Defined in Para 9.9.1 of the London Plan (2021) as land with planning permission for a waste use <u>or</u> a permit from the Environment Agency for a waste use. This is different to the definition being used to identify sites for safeguarding in the Proposed Submission WLWP.
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.
Materials Recycling Facility (MRF)	A facility for sorting recyclable materials.
Old Oak and Park Royal Development Corporation	The Old Oak and Park Royal Development Corporation (OPDC) is a Mayoral Development Corporation (MDC), established to secure the regeneration of the Old Oak and Park Royal area, spanning land in three London boroughs – Ealing, Brent and Hammersmith & Fulham.
(The) Plan Area	The geographical area administered by the six West London Boroughs and covering part of the OPDC area.
Qualifying Capacity	Paragraph 9.8.4 of the London Plan 2021 specifies waste management capacity that qualifies as contributing towards meeting the Borough level apportionments for the management of waste in London as follows: ▪ waste is used for energy recovery ▪ the production of solid recovered fuel (SRF), or it is high-quality refuse-derived fuel (RDF) meeting the Defra RDF definition as a minimum which is destined for energy recovery ▪ it is sorted or bulked for re-use (including repair and re-manufacture) or for recycling (including anaerobic digestion) ▪ It is reused or recycled (including anaerobic digestion).
Recovery	Subjecting waste to processes that recover value including recycling, composting or thermal treatment if energy is recovered.
The London Plan	The extant version of The London Plan. In this case the version adopted in 2021.
Waste Planning Authority (WPA)	The local authority responsible for waste development planning and control. In this case the six West London Waste Planning Authorities plus OPDC.
West London Planning Authorities (LPAs)	The seven West London LPAs that are party to the WLWP as follows: Brent; Ealing; Harrow Hillingdon Hounslow; and Richmond Upon Thames Old Oak and Park Royal Development Corporation (OPDC)
West London Waste Authority	The single Waste Disposal Authority for West London formed by the six West London Boroughs.

Contents

1. Executive Summary	1
Findings	1
2. Purpose.....	2
Principal Data Sources.....	2
3. Policy Context.....	5
The London Plan.....	5
4. Methodology	6
The London Plan 2021.....	6
Stage 1: Preliminaries	6
Stage 2: Establishing Maximum Site Capacity.....	10
Stage 3: Screening out Non-Qualifying Capacity.....	13
5. Assessing C, D & E Waste Management Capacity	15
Excavation Waste Management.....	16
6. Assessing Hazardous Waste Management Capacity	17
7. Non inert Waste Landfill Requirement.....	18
8. Appendices.....	20
Appendix 1: Site by Site Breakdown of Capacity Contribution to C& D Waste Management	20
Appendix 2: Site by Site Breakdown of Capacity Primarily Managing Hazardous Waste (virtually all hazardous HIC waste management capacity) (15% threshold) (tpa)	22
Appendix 3: Site by Site Breakdown of Capacity Contribution to HIC Waste Management .	23
Appendix 4: Sites identified as providing capacity for Excavation Waste Management (85% threshold)	27
Appendix 5: Assessing capacity at sites exempt from permitting	28

Table of Tables

Table 1: Permitted Waste Sites in West London by Facility Type & Category	8
Table 2: Sites under West London Borough control and their Assessed Capacity (tpa).....	11
Table 3: Permitted Sites in West London with no input entry in the WDI	12
Table 4: Combined apportionment for West London boroughs compared to Assessed Qualifying Capacity in West London	14
Table 5: Forecast non-hazardous C & D waste arisings for West London compared to estimated non-hazardous C & D Waste Management Capacity in West London (tpa)	15
Table 6: Forecast hazardous waste arisings for West London compared to Assessed hazardous waste Management Capacity in West London	17
Table 7: London Plan Forecast HIC Waste Arisings for the West London Boroughs	18
Table 8: Predicted Landfill Requirement for West London Non-Inert Waste	19
Table 9: Additional sites with Registered Exemptions not considered to be unlawful	28
Table 10: Tonnage attributed to registered exempt activities within West London.....	29

1. Executive Summary

- 1.1 This report provides an assessment of how the existing waste management capacity in west London meets the management requirements for:
- household, commercial and industrial waste (HIC) apportioned to the six Boroughs by the London Plan 2021 (LP apportionments); and
 - construction and demolition waste (C&D), plus excavation waste and hazardous waste forecast to arise in west London to 2041.
- 1.2 The methodology applied in this capacity assessment is based on the review of a range of data sources. The capacity values obtained from each source were then assessed using expert judgement to arrive at site specific capacity values. An Operator Survey was conducted during the Spring/Summer of 2025 to verify these values with operators where possible. The values were also published in the version of this report published alongside the Regulation 18 consultation version of the WLWP. Changes made in light of responses and other information are detailed on the document control sheet which provides an audit trail. This approach ensures that the capacity assessment is based on the best available evidence at the time, and is as robust as possible.

Findings

- 1.3 A comprehensive review of capacity data across the West London Waste Plan area shows:

Qualifying Management Capacity for Apportioned HIC Waste

- 1.4 There is sufficient qualifying management capacity to manage the London Plan 2021 apportionments through to 2041. The capacity surplus at 2041 is assessed to be c0.31 Mtpa.

Management Capacity for C & D Waste

- 1.5 There is sufficient capacity to manage the forecast C & D waste arisings in accordance with the London Plan 2021 management targets. The capacity surplus at 2041 is assessed to be c0.85 Mtpa.

Management Capacity for Inert Excavation Waste

- 1.6 The London Plan sets a target for all inert excavation waste produced in London to be put to beneficial use i.e. not disposed of without a specific purpose, but it is not subject to the overall objective of management within London and hence can take place outside London. Nevertheless the assessment of capacity in west London indicates that existing capacity at railhead transfer sites and consented permanent deposit to land site in combination should be sufficient to ensure safe management of this waste stream.

Management Capacity for Hazardous Waste

- 1.7 There is sufficient capacity to manage the forecast hazardous waste arisings in the Plan area through to 2041. It should be noted there is no policy expectation that individual Plan areas be net self-sufficient for the management of hazardous waste forecast to be produced.

Landfill Management Capacity for Residual non-inert waste

- 1.8 In the absence of any operational non-hazardous landfill capacity in the Plan area, and the expectation of a continuing, albeit reducing, requirement for non-hazardous waste landfill, reduced reliance on export to landfills located outside west London is expected to continue.

2. Purpose

- 2.1 This report sets out the latest position on the assessment of how the existing capacity in west London meets the management requirements for:
- household, commercial and industrial waste (HIC) apportioned to the six Boroughs by the London Plan 2021 (LP apportionments);
 - C,& D waste plus excavation waste and hazardous waste forecast to arise in west London to 2041.
- 2.2 West London comprises the following London Boroughs:
- Brent;
 - Ealing;
 - Harrow
 - Hillingdon
 - Hounslow; and
 - Richmond Upon Thames
(hereinafter referred to as "the West London Boroughs").
- 2.3 In addition, the Old Oak and Park Royal Development Corporation (OPDC), covering part of the administrative area of Ealing and Brent, is party to the Plan. OPDC does not have a separate HIC waste apportionment in the London Plan but is expected to co-operate with host boroughs to meet identified waste needs (Policy SI 8 of the London Plan).

Principal Data Sources

- 2.4 The principal data sources used to generate this capacity assessment are:
- Environment Agency Waste Data Interrogator (WDI) 2019-2023 Waste Received and Waste Removed datasets
 - WLWP 2015 Capacity Assessment
 - Environment Agency Permit Register
 - Planning consents and applications documents from Local Planning Registers
 - Responses to Operator Survey
- 2.5 Each source is considered in more detail below, with more details provided in section 4 on the methodology.
- Waste Data Interrogator
- 2.6 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) setting out the quantities, types and origin of waste received and, where applicable, destination and fate of waste removed. 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 2023 WDI (version 1 released September 2024), for the calendar year 2023, was the most current version available at the time of production of this assessment in November 2024.

WLWP 2015 Capacity Assessment

- 2.7 The majority of sites identified as operational in 2025 existed in 2013, when the previous capacity assessment¹ was undertaken. All those existing waste sites are safeguarded through the adopted WLWP 2015, so it is expected that each site ought to have retained the ability to operate at the capacity assessed at that time as a minimum, even if inputs might have fallen in more recent years. The approach to generate these values has previously been tested and found sound and the same methodology has been used for other waste plans that have been examined more recently.

Environment Agency Permit Registers

- 2.8 A list of sites subject to an environmental permit at the time the assessment was initially produced (November 2024) was obtained from the Environment Agency's public register². Records were downloaded for each of the west London boroughs and combined into a single dataset for the purposes of the capacity assessment. Copies of the relevant environmental permits were also obtained from the Environment Agency to provide further site-specific information where available.
- 2.9 There are two types of environmental permits, being Standard Rules Environment Permit, and a bespoke Environment Permit. Standard Rule permits are not tailored to the operational characteristics of individual sites and set a pre-determined annual capacity limit. In contrast operators seeking a bespoke Environmental Permits may seek any annual throughput but the application will be subject to site specific assessment by the Environment Agency to determine if acceptance of the proposed tonnages will be acceptable within the confines of the particular site³. Where a site operates under a bespoke permit these were used to determine maximum permitted capacity of a site. Where a site operates under a Standard Rules permit the maximum permitted tonnage was only used as an indicator of potential capacity where actual input data indicated that achieving the limit was within the bounds of possibility. These permits were therefore considered alongside other evidence sources, including the WDI datasets, planning information, operator engagement and local authority knowledge, to determine a realistic assessment of operational capacity.

¹ West London Waste Plan *Assessment of Existing Capacity & Apportionment* BPP Consulting 27th February 2014

² <https://environment.data.gov.uk/public-register/view/index>

³ Under Schedule 5 (paragraph 13) of the Environmental Permitting (England and Wales) Regulations 2016, the Environment Agency must refuse an application for an environmental permit where it is not satisfied that the proposed operation can be carried out in accordance with the permit requirements. As part of this determination process, the Environment Agency would consider whether the quantities of waste proposed to be accepted could be managed effectively by the facility without unacceptable environmental or operational risks.

LPA Planning Registers

- 2.10 Each west London Local Planning Authority maintains a register of planning applications and decisions. These registers were reviewed to identify waste-related planning permissions and supporting documentation relevant to the capacity assessment. The planning registers provide a range of information on existing and proposed waste management capacity, including details set out within application forms and supporting statements. Where planning permissions included conditions specifying maximum annual throughput limits, these were given precedence as they represent the approved operational limits for the development and would have been imposed following site-specific scrutiny. Information contained within the application documents and supporting material was used as supplementary evidence to inform the capacity assessment where no specific planning condition was identified.
- 2.11 This approach recognises that planning permissions define the approved parameters for the development but do not necessarily reflect actual operational throughput (which may be less). Planning Register Information was therefore considered alongside the other evidence sources (environmental permits, WDI, operator engagement, and local authority knowledge) to establish a robust and realistic assessment of waste management capacity.

Operator Survey

- 2.12 A survey of the operators of the principal permitted facilities operating in west London was conducted in Summer 2025 by BPP Consulting. Operators of sites within west London were contacted by telephone to confirm the following:
- the assessed peak capacity value arrived at,
 - whether there are planning or permit limits on the site inputs which might act as a constraint on their operation;
 - whether there were any issues or concerns that might affect the continued operation of the site;
 - any plans to expand or modify operations in West London in the next few years.
- 2.13 Due to the sensitive nature of the contact, responses have been kept confidential. More details about the survey and outcomes are set out in section 4.
- 2.14 In addition to the above, Local Authority officer knowledge was sought for certain sites. Landowners of all existing waste sites identified through a Land Registry search, were written to along with operators inviting comment on the Regulation 18 version of the WLWP as part of the public consultation. Responses were received from a number advising amongst other matters of changes in capacity values in some cases and confirming those used, in others. Where requests to amend capacity values were submitted these were scrutinised and amendments were made where justified. In other cases, changes were not made, as they were not considered to be properly justified by the evidence.

3. Policy Context

The London Plan

- 3.1 The London Plan 2021 includes forecast arisings of household waste plus commercial and industrial waste for London by Borough to 2041 (referred collectively as HIC waste). These forecasts were used by the GLA as a basis to allocate quantities of HIC waste to each Borough to provide for its management. This contributes to achievement of the overall goal of managing the equivalent of 100 per cent of London's waste within London (i.e. net self-sufficiency) by 2026 (London Plan Policy SI 8)⁴. The allocation has been derived through a process that includes assessment of existing capacity in each Borough along with other factors considered to determine the ability of a particular Borough to provide sufficient management capacity⁵. The quantities arrived at are referred to as the London Plan apportionments ('LP apportionments').
- 3.2 The types of capacity that count towards the management of apportioned HIC waste (referred to as "qualifying capacity") are listed in Paragraph 9.8.4 of the London Plan as follows:
- i. energy recovery in London;
 - ii. production of solid recovered fuel (SRF) and refuse derived fuel (RDF) in London;
 - iii. sorting or bulking for re-use or recycling including anaerobic digestion. The reuse or recycling may take place within or outside London providing the sorting and bulking capacity is located within London; and
 - iv. reuse or recycling including anaerobic digestion within London.
- 3.3 The London Plan also sets out management targets for waste generated in London as follows:
- Ensure that there is zero biodegradable or recyclable waste to landfill by 2026
 - Meet or exceed the municipal waste recycling target of 65 per cent by 2030⁶
 - 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 use⁷.
- 3.4 In connection with hazardous waste management capacity, Paragraph 9.8.18 identifies "...a need to continue to identify hazardous waste capacity for London. The main requirement is for sites for regional facilities to be identified. Boroughs will need to work with neighbouring authorities to consider the necessary facilities when planning for their hazardous waste."
- 3.5 The above requirements set the policy framework against which this updated capacity assessment exercise has been undertaken.

⁴ The London Plan specifically excludes excavation waste from the aim of overall net self-sufficiency on the following basis: *"The particular characteristics of this waste stream mean that it will be challenging for London to provide either the sites or the level of compensatory provision needed to apply net self-sufficiency to this waste stream."* (Para 9.8.1)

⁵ The methodology applied is set out in *London Plan Waste Forecasts and Apportionments Task 4 – Updating the apportionment method Methodology Report* (SLR/LUC August 2017).

⁶ London Plan Footnote 163: Based on the EU definition of municipal waste being household waste and other waste similar in composition to household waste. This includes business waste collected by local authorities and by the private sector.

⁷ London Plan Footnote 164 All inert excavation waste should be used for beneficial purposes.

4. Methodology

- 4.1 The following methodology was applied to identify the contribution that existing waste management sites in west London may make towards the current and future management of HIC waste subject to the London Plan 2021 apportionment, as well as C & D waste, excavation waste and hazardous waste.
- 4.2 This methodology replicates that used to assess capacity for the adopted WLWP 2015. The approach taken to assessing capacity has been used in multiple Waste Needs Assessments that have underpinned plans found sound on examination and reflects the advice on such matters included in the national Planning Practice Guidance⁸.

The London Plan 2021⁹

- 4.3 The London Plan (2021) defines existing waste sites as "*land with planning permission for a waste use or a permit from the Environment Agency for a waste use*"¹⁰ (Paragraph 9.9.1). While the Proposed Submission WLWP proposes an alternative definition for the purposes of safeguarding, the starting point of this exercise has been the current listing of permitted waste sites available for download from the Environment Agency public register.
- 4.4 The London Plan goes on to state with respect to assessing capacity of such sites that:
"When assessing the throughput of a site, the maximum throughput achieved over the last five years should be used; where this is not available potential capacity of the site should be appropriately assessed." (Paragraph 9.9.2).
- 4.5 The Environment Agency Waste Data Interrogator (EA WDI) is the principal source of data on annual site inputs to permitted sites, and the fate of waste that leaves any intermediate sites (where it doesn't meet its final fate). The WDI for 2023 was the most current version available at the time the assessment was undertaken.

Stage 1: Preliminaries

- 4.6 The EA public register has been used to identify waste sites located in west London subject to an environmental permit at the time this report was first authored (November 2024). The WDI was then used to identify those sites that accepted waste in any one year over the preceding 5-year period (2019-2023). In some cases, sites with permits had not reported any inputs during the period. This may be because the site had not commenced operating at that time (the permit register relating to 2025, whereas the WDI related to 2023) or that a site may be dormant, or the use has ceased. While permits attract annual subsistence fees, some holders may choose to retain their permits even if they are not actually using them.

⁸ <https://www.gov.uk/guidance/waste#evidence-needed-to-identify-waste-requirements-in-local-plans>

⁹ It is noted that review of the London Plan is underway. However, it is expected the examination of this Plan will be based on conformity with the adopted London Plan (2021), therefore, the requirements set out in the 2021 version are addressed.

¹⁰ Unlike planning consent which normally runs with the land to which it relates, environmental permits are held by a particular occupier. Such permits may be surrendered by a permit holder or revoked by the Environment Agency at any time. They may also cease to exist in the event they are held by an individual who dies or by a company that goes into administration.

Assessing Qualifying Capacity for HIC Waste Subject to the LP Apportionments

Step 1: Data Cleansing

- 4.7 Checks of the EA WDI dataset over the 5 year period found 4 sites had not reported any inputs for the most recent 3 year period. Of these, one site was not considered further as inputs reported in the previous two years of the five year data period were considered to be insignificant (less than 500tpa- Goldstar Commercial). One site was a recovery to land operation (Airlinks Golf Club), so assumed to be complete. The remaining 2 sites were also excluded on the basis that none were either subject to an environmental permit in 2024 or express planning consent for a waste use and would not qualify as existing waste sites under the London Plan definition (Kershire Recycling plus Proper Oils)¹¹.
- 4.8 Furthermore, the following were excluded:
- 3 permanent deposit sites related to the HS2 project have been excluded on the basis that they are managing arisings onsite as part of the project;
 - 2 sites (Glynns Skips & SCRL) where compensatory capacity has been provided at another site in west London (Sortera & Citron Hygiene (HO13)) and 1 site (Wembley Car Breakers) where compensatory capacity has not been provided;
 - 4 permits relating to two storage sites were also excluded as only waste transfer will take place (Hayes Depot, Ruislip Depot x2 inc, Train Loading Bay)¹²;
 - 1 wastewater treatment works (WwTW).
- 4.9 This left 78 sites for further investigation. The remaining 78 sites fell within the facility type and site category set out in Table 1.

¹¹ These sites are not proposed to be safeguarded through the WLWP as they made a nil contribution towards capacity.

¹² Transfer/storage capacity for hazardous waste was counted towards management capacity as it is not subject to the qualifying capacity definition of HIC waste subject to the LP apportionments and contributes towards the safe management of this waste stream, this being the primary objective.

Table 1: Permitted Waste Sites in West London by Facility Type & Category

Facility Type	Site Category						
	Landfill	Metal Recycling Site	To Land	Storage	Transfer	Treatment	Total
CA Site	-	-	-	-	6	-	6
Car Breaker	-	2	-	-	-	-	2
Clinical Waste Transfer	-	-	-	-	3	-	3
Composting	-	-	-	-	-	3	3
Deposit of waste to land (recovery)	-	-	2	-	-	-	2
Inert Landfill	1	-	-	-	-	-	1
Inert Waste Transfer	-	-	-	-	6	-	6
Inert Waste Transfer / Treatment	-	-	-	-	-	1	1
Material Recycling Facility	-	-	-	-	-	4	4
Metal Recycling	-	3	-	-	-	-	3
Non Haz Waste Transfer / Treatment	-	-	-	-	-	9	9
Non-Haz Waste Transfer	-	-	-	-	24	-	24
Physical Treatment	-	-	-	-	-	10	10
Physical-Chemical Treatment	-	-	-	-	-	1	1
Recovery of Waste	-	-	-	-	-	1	1
Temporary storage installation	-	-	-	1	-	-	1
Vehicle depollution facility	-	1	-	-	-	-	1
Grand Total	1	6	2	1	39	29	78

Step 2: Initial screen for non qualifying capacity

- 4.10 Sites identified as landfill (1 inert) and deposit to land (2) were removed as they have a finite life. Neither type of capacity count towards qualifying capacity for the management of HIC waste subject to the London Plan apportionment. In total 3 sites were excluded at this stage.
- 4.11 In addition, one site (J Byne Springhill Quarry) located in LB Hillingdon was disregarded as it is understood to be subject to planning enforcement action plus another site was not subject to a permit in 2024 (LG Grndon, High View Farm) and was not known to the local planning authority. In addition, one permitted site, operated by Talking Rubbish at Rigby Road (HI14) was deemed to not be lawful under planning so was also excluded.
- 4.12 This left 72 operational permitted existing waste sites for further investigation.

Consideration of Waste Transfer Stations

- 4.13 The London Plan identifies sites undertaking waste transfer as distinct from sites where waste is deemed to be managed. This is because historically waste was only bulked up for disposal elsewhere at such sites. However, examination of data for inputs and outputs of permitted sites shows that in recent years some processing (or management) does actually take place at many sites classed as waste transfer sites (WTS) under the Environment Agency permit classification scheme. Moreover, as bulking of source-segregated recyclables is included as qualifying capacity in the London Plan (as set out in para 3.2 of this report), capacity at transfer sites has been considered further below.

Step 3: Identify sites managing predominantly C& D waste plus excavation waste and hazardous waste

- 4.14 Data for inputs reported in the WDI (2023) were interrogated and split using the predetermined basic waste category set in the WDI as follows:
- household, industrial & commercial waste (HIC);
 - inert (predominately, but not exclusively) C, D & E waste;
 - hazardous waste.
- 4.15 Sites dedicated to the management of C & D waste, excavation waste and hazardous waste were separated as there are separate management requirements¹³ and in the case of capacity managing C & D and excavation waste, capacity does not count towards the LP apportionments¹⁴.
- 4.16 The percentage input of each waste type listed above was determined on a site-by-site basis. Where the input exceeded a threshold of 85% for either non-hazardous C, D & E waste or hazardous waste, these sites were screened out of the HIC waste apportionment capacity assessment on the basis that they are dedicated to the management of non-apportioned waste. The following was found:
- 22 sites had inputs of 85% or more of non-hazardous C & D waste;
 - 5 sites had inputs of 85% or more of hazardous waste or were permitted to manage up to 85% of inputs as hazardous waste. In addition capacity at the safeguarded Arlington Works site was included based on the capacity agreed during a planning appeal¹⁵.
 - 4 sites had inputs of 85% or more of non hazardous excavation waste;
- 4.17 These sites are listed in Appendix 1, 2 and 4 respectively and their capacity is assessed in Sections 5 and 6 of this report.
- 4.18 This left 40 operational permitted sites managing waste subject to the London Plan apportionment for further investigation of their capacity. 8 sites are operated by the Councils, or West London Waste Authority (WLWA) and are listed in Table 2. 2 sites are operated by SUEZ on behalf of WLWA.
- 4.19 The remaining 30 sites were assessed as follows: Where a site received inputs of HIC waste plus other wastes, but the other waste represented 15% of the input or less, these inputs were taken to be incidental to the principal operation involving the management of HIC waste and all available capacity was assumed to be available for the management of HIC waste. This was done on the basis that few if any sites would be prevented from accepting HIC waste instead of the 15% or less of tonnage received of waste from other sources should it become available and such a change would be unlikely to be regarded as material, requiring express planning permission. This is considered further in Step 7.

¹³ See separate report *WLWP Hazardous Waste Forecasts to 2041*. BPP Consulting November 2025.

¹⁴ While hazardous waste arising in the HIC waste stream is counted in the LP apportionment (para 9.8.18 LP), management capacity is dealt with separately in this report.

¹⁵ Appeal Ref: APP/L5810/W/20/3249153.

Stage 2: Establishing Maximum Site Capacity

Step 4: Site by Site Assessment

4.20 The following data and information have been reviewed on a site by site basis:

- Input data presented in the WDI over the 5-year period for which data was available, 2019-2023. The 5-year peak input was then identified (as per London Plan para 9.9.2). To allow for the possibility that the peak input value is not an absolute limit, a 15% 'freeboard' was added to the peak input values obtained for sites that don't operate facilities with fixed inputs such as AD plants. This is intended to reflect the maximum realistic throughput of an intermediate waste management facility¹⁶.
- Planning consents issued by each LPA were reviewed where available¹⁷ to identify any capacity limitations relating to annual throughput.
- Permits issued by the Environment Agency were reviewed. Where a site operates under a bespoke permit with limits set according to the specific activities, the permitted limit has been applied. This is on the basis that a site's ability to manage the tonnage set has been assessed as being acceptable by the Environment Agency when it issued the permit or permit variation. However, where a permitted site operates under a Standard Rules permit, which have predefined banded input limits that do not necessarily correspond to the actual operating capacity of the individual sites, the permit limit has only been used as a guide.

4.21 Reference has also been made to the peak capacity assessed as part of the evidence base of the adopted WLWP 2015. This is on the basis that all things being equal, any existing waste site assessed at that time may be expected to have retained the ability to operate at the assessed capacity as a minimum, given each is safeguarded for that purpose through the adopted WLWP 2015.

4.22 To establish the maximum design capacity that each site might have, the largest value from each of the sources above (where available) was taken as shown in Tables 2 and 3 and Appendices 1, 2 and 3. The values obtained were verified with site operators where possible through an Operator Survey undertaken between May and August 2025.

Step 5: Accounting for sites operating under West London Borough control

4.23 The six West London Boroughs have established a single waste disposal authority, the West London Waste Authority (WLWA). There are 10 permitted sites currently managed either by, or under contract to, WLWA or by the West London Boroughs themselves. 2 of these sites (Victoria Road WTS in Hillingdon and Transport Avenue WTS in Hounslow) are operated by a third party contractor, Suez Recycling and Recovery Ltd that has through the operator survey confirmed that the residual LACW both sites receive undergoes preparation into an RDF prior to being delivered by rail to EfW plants outside London. This is confirmed by the entries in the WDI Waste Removed dataset for each site. As such management capacity offered by these two sites qualifies as waste management capacity for apportioned waste under the London Plan

¹⁶ This is a recognised approach when developing waste plans and has been used in waste plans across England including Kent (Minerals and Waste Plan 2021) and Surrey County Council Waste Local Plan 2020.

¹⁷ Some sites that have operated for 10 years or more without being subject to enforcement action were deemed to be lawful by the relevant LPA for the purposes of the exercise. However, to confirm this, and consented capacity, a formal application would be required.

definition (as set out in para 3.2 ii of this Report). This gives a value of **488,098tpa of qualifying capacity**.

4.24 Table 2 below lists the remaining 8 sites and their assessed capacities based on inputs and advice from WLWA¹⁸.

Table 2: Sites under West London Borough control and their Assessed Capacity (tpa)

Facility WPA	Site Id	Site Name	Operator	Capacity contribution assessed in WLWP 2015	WDI 2019-2023 Peak input ¹⁹	Environmental Permit Limit	Assessed Capacity Value
Ealing	E01	Greenford Depot Reuse & Recycling Centre	Ealing Council	14,438	13,268	75,000	13,268
	E02	Acton Circular Economy Hub ²⁰	SUEZ Recycling & Recovery UK Ltd	4,123	3,881	15,330	55 ²¹
	E15	Greenford Depot (Waste Transfer Station)	Ealing Council	101,003	30,046		30,046
Harrow	HA01	Forward Drive, Depot & CA site	Harrow Council	150,150 ²²	30,757	-	30,757
Hounslow	HO01	Space Waye Civic Amenity Site	Hounslow Council	33,390	20,084	-	20,084
Richmond Upon Thames	R01	Townmead Civic Amenity Site	Richmond Upon Thames Council	26,575	21,584	75,000-	21,584
Hillingdon	HI01	New Years Green Lane Civic Amenity Site	Hillingdon Council	27,000	68,057 ²³	75,000	68,057 ²⁴
Brent/OPDC	B01	Twyford WTS Abbey Road	WLWA	80,600 ²⁵	30,003	74,999	30,003
Total							213,854

4.25 Table 2 shows a total of c213,854 tpa of capacity is available at the west London Borough/WLWA operated sites. When combined with the qualifying capacity available for the management of apportioned waste at the two WLWA WTS operated by Suez Recycling & Recovery UK Ltd of 488,098tpa, this gives a running total for qualifying capacity of **701,952tpa**.

¹⁸ Email dated Feb 6th 2025 from Rajiv Rajput WLWA “: West London LACW Destinations & Capacities of WLWA sites”.

¹⁹ As per WLWA email dated Feb 6th 2025 “HWRC capacity is likely to decrease going forwards as the sites will be focusing on more material segregation, particularly for reuse (e.g. bikes), which takes up a lot more space” therefore, no 15% headroom has been added to these sites.

²⁰ Site granted planning permission as circular economy hub August 2025 (250683FUL)

²¹ Reuse t/hectare factor of 377tpa, based on WLWA advice (email from Tom Beagum re: Abbey Road reuse activity (20.06.2025). Site area 0.1466 hectares.

²² Allocated site assessed capacity in WLWP 2015 applying 65kt/hectare factor based on GLA research.

²³ Site redeveloped for waste use since adoption of WLWP 2015.

²⁴ Adjusted post Reg 18 (75ktpa advised through Operator Survey).

²⁵ Allocated site assessed capacity in WLWP 2015.

Step 6: Additional Sites

4.26 As the most recent WDI available at the time of initial writing of this Report related to 2023, and additional sites may have been granted permits since then, the site listing drawn from the WDI was compared with the listing for all sites subject to a permit for waste granted by the Environment Agency in December 2024. This identified sites that have an environmental permit but for which no inputs were reported in the WDI from 2019-2023. These are listed in Table 3.

Table 3: Permitted Sites in West London with no input entry in the WDI

Site Id	Site Name	Operator	Permit Type	Permit Limit ²⁶	Consented Capacity	Capacity Type
E03	Colville Road, Acton	Elis UK Ltd	A12: Clinical Waste Transfer Station	1,000	-	Hazardous
E04	Land off Collett Way	Wards Of London Properties Ltd (Rail Logistics Ltd)	S1510 No 10: 75kte HCI Waste TS + treatment + asbestos	150,000 ²⁷	124,609 ²⁸	C,D & E waste
HI02	Airside Waste Sweepings Transfer & Treatment Facility	Heathrow Airport Ltd	Physico-Chemical Treatment of > 50 T/D Non-Hazardous Waste >10 T/D Hazardous Waste Recycling Or Reclamation of inorganic Hazardous Waste with A Capacity Exceeding 10 T/D	70,080 (based on 192 tonnes per day max)	-	25% hazardous (c17,500 tonnes) and 75% apportioned waste) (c52,500 tonnes)

4.27 Table 3 shows that these additional sites offer the following capacity by waste stream:

- 52,500 tpa qualifying capacity for apportioned HIC waste
- 33,179 tpa for C, D & E waste management.
- 18,500 tpa for hazardous waste management inc. transfer.

4.28 When the 52,500 tpa value of qualifying capacity is added to the qualifying capacity running total of 701,952tpa above , this gives an updated running total of **754,452 tpa of qualifying capacity** to manage the tonnage of HIC waste apportioned through the London Plan 2021.

²⁶ Permit limits taken from SR permits to be treated as a guide only.

²⁷ Site originally granted a standard rules permit for up to 75ktpa but the operator applied to increase to 150,000tpa to meet the required target tonnage for compensatory capacity in February 2024. The agent for the application has advised the variation was granted in January 2026.

²⁸ Of the 124,609 tonnes total capacity 91,492 tpa is reserved as compensatory capacity for release of former Bridgemarts site at Twyford Abbey Road (Compensatory Waste Provision at Collett Way, AA Environmental Ltd Jan 2024). So only remaining difference, 33,117tpa, has been counted.

Stage 3: Screening out Non-Qualifying Capacity

Step 7: Accounting for CDEW & Hazardous Waste Management Capacity

4.29 As the LP apportionment is specific to HIC waste, capacity at sites that received HIC waste plus C, D & E waste and/or hazardous waste has been identified separately. As discussed in paragraph 4.14 the percentage inputs of each waste stream (using the 2023 WDI data entry per site) reported was applied to the maximum capacity value on a site-by-site basis. Where the percentage input for either C, D & E waste or hazardous waste or both in combination fell below 15%, all capacity has been taken to count towards the management of apportioned HIC waste. This is on the basis that management of 15% or less would be regarded as being incidental to the principal waste use. Where sites taking predominately C,D & E waste also managed HIC waste the proportion was applied to the capacity value and this gave an additional capacity value of 8,288tpa (Holloway Lane Materials Recycling Facility (HI09)). When this value is added to the qualifying capacity running total of 754,452tpa above, this gives an updated running total of **762,740 tpa of qualifying capacity** to manage the tonnage of HIC waste apportioned through the London Plan 2021.

Step 8: Assessing Recovery Rates Achieved

- 4.30 As the definition of capacity for the management of HIC waste considered to be qualifying for the purposes of meeting the LP apportionments is intended to promote recovery over disposal, capacity has been assessed applying the following approach:
- a) For certain types of sites, such as metal recycling sites (MRS), it has been assumed that all the capacity contributes towards the diversion targets²⁹.
 - b) For the remaining sites, the actual diversion rates achieved as indicated by the WDI Waste Removed output dataset was used on a site by site basis. Where the fate was indicated as 'landfill', 'transfer' or 'unknown' the values were taken to be counted towards disposal and capacity discounted. Where they were reported as going on for 'recovery', 'treatment' or 'incineration' they were counted towards diversion capacity. This was undertaken using the last 5 years of output data reported in the WDI to take the maximum recovery rate the site had achieved. Appendix 3 includes the result of these calculations. These capacity splits were verified with site operators where possible through the Operator Survey.
- 4.31 This exercise generated a value for qualifying capacity for the management of HIC waste subject to the LP apportionment of **1,765,004 tonnes per annum**, as shown in Appendix 3. When added to the qualifying capacity running total of 762,740tpa above, this gives an updated **total of c.2,527,744 tpa of qualifying capacity** to manage the tonnage of HIC waste apportioned through the London Plan 2021. This value was then compared with the quantities of HIC waste whose management the Boroughs are expected to provide for, as set in the London Plan apportionments shown in Table 4 overleaf.

²⁹ Unless the MRS receives >85% CDE or hazardous waste, accounted for in Appendix 1 and 2.

Table 4: Combined apportionment for West London boroughs compared to Assessed Qualifying Capacity in West London

	2021	2041
Brent	412,000	437,000
Ealing	542,000	576,000
Harrow	160,000	170,000
Hillingdon	423,000	449,000
Hounslow	407,000	432,000
Richmond	148,000	157,000
Total Apportionment Forecast	2,092,000	2,221,000
WLWP Qualifying Capacity	2,527,744	2,527,744
Difference	+435,744	+306,744

- 4.32 Table 4 shows there is a predicted surplus in qualifying capacity to manage the apportioned tonnage of HIC waste throughout the Plan period. The figures in Table 4 represent the latest capacity assessment and are slightly lower to those contained in the Regulation 18 version of this Capacity Assessment (and Table 7 of the Regulation 18 Draft WLWP) as they reflect adjustments made in response to Regulation 18 representations.
- 4.33 The predicted surplus suggests that at the time of assessment sufficient capacity at existing waste sites contributing towards managing apportioned HIC waste would be available to compensate for the release of the existing waste sites identified in the assessment of existing waste sites to be released report³⁰.

³⁰ WLWP Regulation 19 Assessment Of Existing Waste Sites To Be Released BPP Consulting (Updated July 2026)

5. Assessing C, D & E Waste Management Capacity

- 5.1 As mentioned in Step 3, sites managing 85% or more C, D & E waste were initially assessed as being dedicated to the management of C, D & E waste. As the London Plan only sets management targets for the management of construction and demolition waste arising in London the site capacities have been further interrogated to determine which sites managed C&D waste as opposed to excavation waste. The sites assessed as managing C&D waste predominantly and their assessed capacities are shown in Appendix 1. These sites contribute c1,684,478 tpa of C & D waste management capacity in 2024, reducing to c1,620,131 tpa in 2027 and 1,554,556 tpa in 2029 as some sites are subject to time limited permissions. When combined with the c605,920 tpa of recovery capacity for C & D waste offered by the sites taking predominately HIC waste shown in Appendix 3, and 33,000 tpa of capacity provided by the sites with a permit but no inputs in the WDI (as per discussion in para 4.24), a total capacity of c2,323,398 tpa in 2024 reducing to c2,193,476 tpa remains from 2029 to 2041, the end of the Plan period.
- 5.2 A separate report³¹ estimated the baseline arising value for non-hazardous C & D waste in 2023 to be c1.13 Mtonnes. A growth forecast has been adopted in line with GLA construction sector employment forecasts and compared with the management capacity available in the Plan area as shown in Table 5 below.

Table 5: Forecast non-hazardous C & D waste arisings for West London compared to estimated non-hazardous C & D Waste Management Capacity in West London (tpa)

	2026	2031	2036	2041
Forecast Arisings (Table 13 of C,D & E waste report)	1,185,095	1,263,067	1,302,067	1,342,272
Capacity (para 5.1)	2,259,051	2,193,476	2,193,476	2,193,476
Difference	+1,073,956	+930,409	+891,409	+851,204

- 5.3 Table 5 shows there is sufficient capacity to manage the C & D waste arisings forecast to arise in west London in 2041. Some of the surplus capacity at existing waste sites of c0.85M tpa for managing C & D waste for recovery would be available to release existing waste sites within the Plan area and could potentially help meet unmet needs of other London Boroughs outside west London if called upon, allowing for the need to maintain some capacity headroom to confer flexibility for plan area provision. A separate report that presents the assessment of Existing Waste Sites to be released , is available.

³¹ Table 12 of WLWP Regulation 19 C, D & E Waste in West London to 2041. BPP Consulting (Updated July 2026)

Excavation Waste Management

5.4 The London Plan sets a target for all inert excavation waste to be put to beneficial use i.e. not disposed of without a specific purpose. Currently there are two sites consented for the permanent deposit of inert waste to land, one located at Harmondsworth Quarry (LB Hillingdon) and one at a mineral extraction site at Western International Market (LB Hounslow) which have been assessed to provide c.1.5Mt of management capacity in total. In addition, four sites identified as managing excavation waste principally by transfer to rail offer c.1.6Mtpa of management capacity. These are listed in Appendix 4. This compares with estimated forecast arisings of between c.2.2Mt in 2026 and c.2.5Mt in 2041³². Given the London Plan accepts that excavation waste should be excluded from the objective of net self-sufficiency, any shortfall of capacity can be managed at facilities located outside west London without compromising the net self-sufficiency objective. Alternatively, it may be increasingly managed onsite as the London Plan envisages at paragraph 9.7.9. In addition, inclusion of Policy WLWP5 in the Proposed Submission WLWP provides for the possibility of further permanent deposit to land sites coming forward in the Plan area over the Plan period.

³² See Table 13 WLWP Regulation 19 C, D & E Waste in West London to 2041. BPP Consulting (Updated July 2026)

6. Assessing Hazardous Waste Management Capacity

- 6.1 Sites managing 85% or more of hazardous waste were taken to be dedicated to the management of hazardous waste. These sites and their assessed capacities are shown in Appendix 2. Note that virtually all inputs to the 6 sites were of HIC waste origin. These sites contributed c38,195 tonnes of hazardous waste management capacity. Combined with the c59,000 tpa of hazardous waste management capacity indicated as available at sites also managing non-hazardous waste of various types shown in Appendix 3 (virtually all sites managed hazardous HIC waste), plus the c18,500 tonnes per annum of capacity provided by the sites with a permit but no inputs in the WDI (as per discussion in para 4.24) gives a total c115,653 tpa of management capacity for hazardous waste.
- 6.2 A separate report³³ provides forecasts for hazardous waste that may arise in West London through to 2041, taking a baseline value in 2023 of c90,000 tonnes and a declining forecast over time. The forecast arisings values are compared with the assessed capacity as shown in Table 6 below.

Table 6: Forecast hazardous waste arisings for West London compared to Assessed hazardous waste Management Capacity in West London

	2026	2031	2036	2041
Forecast Arisings (Table 6 of hazardous report)	93,420	102,196	64,694	50,877
Capacity	115,653	115,653	115,653	115,653
Difference	+22,233	+13,457	+50,959	+64,776

- 6.3 Table 6 shows there is a predicted surplus in capacity at all four milestone years in the Plan period, with a growing surplus in the final two milestone years due to the falling forecast for hazardous waste arisings through to 2041.
- 6.4 Moreover, given the diverse nature of hazardous wastes, there is no policy expectation that individual Plan areas be net self-sufficient for the management of hazardous waste. Rather that existing capacity be safeguarded and additional capacity be sought in co-operation with other Plan areas. This is set out in the London Plan as follows:
- "The main requirement is for sites for regional facilities to be identified. Boroughs will need to work with neighbouring authorities to consider the necessary facilities when planning for their hazardous waste." (paragraph 9.8.18)*
- 6.5 Therefore, even if a shortfall were to be indicated it should not necessarily be a barrier to release of specific sites or impose a requirement to provide for additional capacity through the Proposed Submission WLWP.

³³ Table 6 of WLWP Regulation 19 Hazardous Waste Forecasts to 2041. BPP Consulting (Updated July 2026)

7. Non inert Waste Landfill Requirement

- 7.1 While there is no obligation in planning policy for west London to achieve net self-sufficiency for non-inert waste management alone, the management of mixed municipal waste by disposal or recovery is subject to the proximity principle and hence consideration has been given to the need for access to sufficient non-inert landfill capacity to receive residual waste forecast to arise in West London that may require landfilling over the Plan period.
- 7.2 Landfill does not count as qualifying capacity for HIC waste under the London Plan and the Mayor's Environment Strategy expresses an aspiration for London to be a “zero waste city” which includes no biodegradable or recyclable waste from any source going to landfill after 2026. The London Plan states the following in connection with possible future provision of landfill capacity within the Capital:
- "Although no further landfill proposals in London are identified or anticipated within the Plan period, if proposals do come forward for new or extended landfill capacity or for land-raising, boroughs should ensure that the resultant void-space has regard to the London Environment Strategy."*
- 7.3 According to the Environment Agency dataset for remaining landfill void in 2023³⁴ there are no operational non-inert landfill sites with remaining capacity in west London. Therefore, all non-hazardous waste residues requiring landfill produced within west London would need to be disposed at sites outside the Plan area for the duration of the Plan period. Table 7 below shows the London Plan forecast of HIC waste arisings in west London. Given that the London Plan apportionments relate to provision of qualifying capacity only, the calculation of non-inert landfill requirement has been based on the HIC forecasts of the London Plan plus an element of residual non-inert C,D& E waste identified in the separate report.

Table 7: London Plan Forecast HIC Waste Arisings for the West London Boroughs

Borough	Forecast HIC Waste Arising from Table 9.1 London Plan	
	2021	2041
Brent	259,000	274,000
Ealing	291,000	306,000
Harrow	188,000	205,000
Hillingdon	347,000	365,000
Hounslow	260,000	275,000
Richmond upon Thames	179,000	190,000
Total	1,524,000	1,615,000

³⁴ <https://www.data.gov.uk/dataset/237825cb-dc10-4c53-8446-1bcd35614c12/remaining-landfill-capacity1>

7.4 Table 8 shows the requirement predicted to arise over the Plan period. It has been assumed that this will start at 2% of HIC waste forecast to be produced in west London falling progressively to 1% by 2041. Plus, forecast arisings of residual non-inert C, D & E waste forecast from Table 16 of the C, D & E waste forecast report³⁵.

Table 8: Predicted Landfill Requirement for West London Non-Inert Waste

1	2	3	4	5
Year	Annual Non-inert Waste Management Requirement			Cumulative Requirement (tonnes)
	Non-inert C+D waste plus non-inert excavation waste to landfill (Table 16 WLWP CDEW Forecasts ³⁶)	2% reducing to 1% of London Plan HIC Forecast	Total annual requirement (tpa)	
2025	1,551	30,844	32,395	32,395
2026	1,591	29,926	31,517	63,912
2027	1,612	29,007	30,619	94,531
2028	1,633	28,089	29,722	124,253
2029	1,654	27,171	28,824	153,077
2030	1,675	26,252	27,927	181,004
2031	1,696	25,334	27,029	208,033
2032	1,706	24,415	26,122	234,155
2033	1,717	23,497	25,214	259,368
2034	1,727	22,579	24,306	283,674
2035	1,738	21,660	23,398	307,072
2036	1,748	20,742	22,490	329,562
2037	1,759	19,824	21,582	351,144
2038	1,770	18,905	20,675	371,819
2039	1,780	17,987	19,767	391,586
2040	1,791	17,068	18,860	410,445
2041	1,802	16,150	17,952	428,397
Total	28,948	399,449	428,397	

7.5 Given the absence of non-inert landfill capacity currently, all non-hazardous residues produced within west London requiring landfill is managed beyond west London. Table 8 shows a declining annual requirement of c32,500 tonnes in 2025 reducing to c18,000 tonnes in 2041. It also shows a total predicted cumulative non-inert landfill requirement of c428,500 tonnes by the end of the Plan period. The continued availability of capacity to accommodate the reducing quantity of residues has been confirmed through engagement with WPAs hosting landfill sites shown as having capacity in the Environment Agency remaining landfill dataset. Further details are set out in Appendix 1 of the Waste Management Topic Paper.

³⁵ Assumes the management profile for West London CDE waste will remain as shown in Table 17 of the West London CDE waste forecast report throughout the Plan period.

³⁶ WLWP Regulation 19 *West London CDE Waste Forecasts to 2041* BPP Consulting (Updated July 2026).

8. Appendices

Appendix 1: Site by Site Breakdown of Capacity Contribution to C& D Waste Management

LPA	Site Identifier	Site Name/Location	Operator	C& D % input ³⁷ 2023	Capacity assessed in WLWP 2015	WDI 2019- 2023 Peak input +15%	Reg 18 Capacity Update	Permit Limit	Assessed Value ³⁸
Brent/ OPDC	B02	100 Twyford Abbey Road ³⁹	Urban Prop 8 S.A.R.L	100%	-	91,492	-	-	91,492
Ealing/ OPDC	E10	Atlas Wharf Park Royal ⁴⁰	Space Rubbish Ltd	100%	-	65,382	-	100,000	65,382
Brent	B03	Land At Neasden Goods Yard ⁴¹	X-Bert Haulage Ltd	100%	31,578	60,254	-	80,000	60,254
	B05	Atlas Road, Wembley	O'Hara Bros. Aggregates Ltd	97%	-	24,180	-	99,000	24,180
	B06	Unit 4 Second Way ⁴²	HAWK Rubbish Clearance Ltd	100%	-	65,575	-	75,000	65,575
	B07	Wembley Depot	Sewells Reservoir Construction Ltd	100%	-	66,596	-	75,000	66,596
	B09	Unit 6 Neasden Goods Yard ⁴³	X-Bert Haulage Ltd	100%	65,260	83,722	-	383,500	83,722
	B16	off Great Central Way, Neasden	L & B Haulage, Neasden	100%	16,696	-		121,237	16,696
Ealing	E05	Station Approach, Oldfield Lane North,	360 Waste Ltd	100%	-	3,099	10,097 ⁴⁴	75,000	10,097
	E06	British Rail Goods Yard	Link2london Ltd	90%	-	88,523	-	146,650	131,985 ⁴⁵
	E08	163-165 Brent Road ⁴⁶	Link2london Ltd	93%	-	40,699	-	75,000	40,699
	E09	Stone Terminal, Horn Lane	Holcim (formerly Aggregate Ind)	100%	-	79,777	-	140,000	79,777
	E14	Station Approach, Oldfield Lane North	Link2london Ltd	100%	-	10,928	46,516 ⁴⁷	75,000	46,516
Running Subtotal (tpa)									782,971

³⁷ The % of total input to the site reported in the WDI 2023 as being of a waste type that would be classed as C & D waste.

³⁸ See text (para4.19) for method applied to arrive at assessed value.

³⁹ Site granted planning permission for non-waste use. Site E20 (Collet Way) identified as compensatory provision but process to secure provision has still to be completed, so site remains safeguarded until it is.

⁴⁰ Located within Channel Gate Place Policy (P9) and within site allocation 26 (Channel Gate) so site is not proposed to be safeguarded through Proposed Submission WLWP.

⁴¹ Subject to live application for planning permission for comprehensive redevelopment of the site for mixed use (23/3462). Compensatory capacity is to be provided so site is not proposed to be safeguarded through Proposed Submission WLWP.

⁴² Site subject to temporary planning permission to September 2029 so site is only proposed to be safeguarded through Proposed Submission WLWP to that date.

⁴³ Subject to live application for planning permission for comprehensive redevelopment of the site for mixed use (23/3462). Compensatory capacity is to be provided so site is not proposed to be safeguarded through Proposed Submission WLWP.

⁴⁴ Value taken from WDI 2024.

⁴⁵ Difference being HIC waste as confirmed by operator survey.

⁴⁶ This site is subject to time limited permission to 2027 so site is only proposed to be safeguarded through Proposed Submission WLWP to that date.

⁴⁷ Value taken from WDI 2024.

LPA	Site Identifier	Site Name/Location	Operator	CDEW % input 2023	Capacity assessed in WLWP 2015	WDI 2019-2023 Peak input +15%	Reg 18 Capacity Update	Permit Limit	Assessed Value
Hillingdon	HI04	WTS, Civic Way Recycling Centre	B & K Environmental Services Ltd	100%	-	209,007	-	250,000	250,000
	HI06	Land Off Holloway Lane	Foley Haulage Ltd	100%	-	27,209	-	-	27,209
	HI07	G K Depot (formerly Trout Lane Depot)	Recycling With Skips Ltd	90%	11,375	41,300	-	275,000	275,000 ⁴⁸
	HI08	Old Stockley Rd, West Drayton	Heidelberg Materials (formerly Hanson Quarry Products Europe Ltd formerly West Drayton Aggregates)	100%	-	35,077	-	75,000	35,077 ⁴⁹
	HI09	Holloway Lane Materials Recycling Facility	Powerday Plc (formerly permitted to SUEZ)	87%	213,688	63,758	-	150,000	55,470 ⁵⁰
	HI13	Skip Lane Harvil Road Harefield	Sortera Ltd (formerly operated Uxbridge Skip & Recycling Ltd)	90%	78,704	113,229	-	-	113,229
	HI16	Wallingford Road Recycling Facility	Uxbridge Recycling Ltd	100%	15,760	4,508	-	-	15,760
Hounslow	HO02	WIM Site Southall	Quattro (UK) Ltd	100%	-	64,347	-	-	64,347 ⁵¹
	HO03	St Albans Farm Recycling Facility	Ron Smith (Recycling) Ltd	93%	49,346	65,415	-	-	65,415
Subtotal sheet 2									901,507
Subtotal sheet 1									782,971
Total									1,684,903
Reducing in 2027 to									1,620,131
Reducing in 2029 to									1,554,556

⁴⁸ As advised through operator survey

⁴⁹ As advised through operator survey

⁵⁰ Difference being HIC waste as confirmed by operator survey.

⁵¹ Site subject to temporary planning permission expiring in 2027 so site is only proposed to be safeguarded through Proposed Submission WLWP to that date.

Appendix 2: Site by Site Breakdown of Capacity Primarily Managing Hazardous Waste (virtually all hazardous HIC waste management capacity) (15% threshold) (tpa)

Borough/ LPA	Site Identifier	Site Name/Location	Operator	% haz input	Capacity assessed in WLWP 2015	WDI 2019-2023 Peak input +15%	Reg 18 Capacity Update	Permit limit	Assessed capacity
Brent	B10	Unit 28, Fourth Way WTF	Brent Oil Contractors Ltd	98%	4,145	4,903	-	24,999	4,903
Ealing	E12	Land/premises At, Alperton Lane	London Auto Parts Ltd	100%	11,150	14,013	-	-	14,013
	E19	Unit 42a Sheraton Business Park,	Autofleet Salvage Limited	-	-	-	-	2,500	2,500
Harrow	HA02	151, Pinner View	Harrow Breakers	100%	-	2,247	-	-	2,247,
Hounslow	HO04	Norris House, Challenge Road ⁵²	Globalparts (UK) Ltd	89%	-	1,128	-	-	1,128
Richmond upon Thames	R04	Arlington Works	Sharpes Oil	100%			13,404 ⁵³		13,404
Total									38,195

⁵² Permission P/2018/2552

⁵³ Capacity value taken from WDI peak referenced in Appeal [APP/L5810/W/20/3249153](#).

Appendix 3: Site by Site Breakdown of Capacity Contribution to HIC Waste Management

Borough/ LPA	Site Id	Site Name	Operator	Capacity assessed in WLWP 2015	WDI 2019-2023 Peak input +15%	Consented Capacity	Permit Limit	Assessed Capacity	Capacity for HIC Waste	Capacity for Haz. Waste	Capacity for C, D & E Waste	Recovery Rate	Recovery Capacity for HIC Waste	Recovery Capacity for Hazardous Waste	Recovery Capacity for C, D & E Waste
Brent	B11	Mitre Works, Neasden ⁵⁴ Lane	European Metal Recycling Ltd	-	16,490	-	86,000	16,490	16,490	0	0	100%	16,490	0	0
	B12	Unit 2, Hannah Close	London Energy Ltd	393,000	211,243	1.17Mt	399,000	185,000 ⁵⁵	185,000	0	0	100%	185,000	0	0
	B13	Alpertons Lane WTS	Sortera Ltd (formerly O'Donovan) ⁵⁶	-	111,733 ⁵⁷	-	300,000	300,000	60,000 ⁵⁸	15,000 ⁵⁹	225,000	100%	60,000	15,000	225,000
	B14	Brent Transfer Station	Veolia ES (UK) Ltd	176,150	218,270	-	365,000 ⁶⁰	365,000	365,000	0	0	100%	365,000	0	0
	B15	Wembley TS & Recycling Facility	Biffa Waste Services Ltd	20,639	119,058	-	150,000	150,000	150,000	0	0	100%	150,000	0	0
Ealing/ OPDC	E13	First Mile Recycling Facility	First Mile Ltd	-	55,067	75,000 ⁶¹		75,000	75,000	0	0	100%	75,000	0	0
Subtotals Sheet 1(tpa)													851,490	15,000	225,000

⁵⁴ Subject to live application for planning permission for comprehensive redevelopment of the site for mixed use (23/3462). Compensatory capacity to be provided via London AutoParts (E12) and Mayer Parry Brentford (HO05) so site is not proposed to be safeguarded through Proposed Submission WLWP.

⁵⁵ Capacity value amended to reflect actual peak as shown in WDI following Reg 18 representations.

⁵⁶ Permit transferred in October 2024.

⁵⁷ Permit variation to increase inputs to 150,000 tpa to 300,000 tpa granted in February 2022. Given recent change in operator (October 2024), actuals may be expected to increase in 2025 onwards.

⁵⁸ Up to 20% may be converted to RDF, i.e. 60,000 tpa counted under the apportionment confirmed through operator survey.

⁵⁹ Permit covers acceptance of a range of hazardous waste and it's assumed up to 5% inputs i.e. 15,000 tpa counted as hazardous waste management capacity

⁶⁰ Bespoke permit allows up to 55,000 tonnes of the permitted capacity for production of RDF and the remaining 310,000 tpa could be used for the bulking of recyclates.

⁶¹ Planning statement to permission 166095OPDFUL.

Borough/ LPA	Site Id	Site Name	Operator	Capacity assessed in WLWP 2015	WDI 2019- 2023 Peak input +15%	Conse nted Capaci ty	Permit Limit	Assessed Capacity	Capacity for HIC Waste	Capacity for Hazardou s Waste	Capacit y for C, D & E Waste	Recov ery Rate	Recovery Capacity for HIC Waste	Recovery Capacity for Hazardous Waste	Recovery Capacity for C, D & E Waste
Ealing	E07	Horn Lane Waste Transfer Station ⁶²	Quattro (UK) Ltd	38,487	17,618	-	-	17,000	14,094 ⁶³	0	3,524	100%	14,094	0	3,524
	E16	Ocean Estate Distribution Centre	Gxo Logistics Fst Ltd	-	4,399	-	-	4,399	4,399	0	0	100%	4,399	0	0
Hillingdon	HI03	New Years Green Lane	BFA Recycling Ltd	-	57,424	-	75,000	57,424	57,424	-	-	100%	57,424		
	HI17	Crows Nest Farm	Country Compost Ltd	24,900	12,892	25,000	24,900	24,900	24,900	0	0	100%	24,900	0	0
	HI18	High View Farm	West London Composting Ltd	75,000	85,404	75,000	120,000	120,000	120,000	0	0	<100 %	119,790	0	0
	HI19	Hillingdon Clinical Waste Incinerator	Medisort Ltd	8,000	6,133	-	8,000	8,000	4,000	4,000	0	100%	4,000	4,000	0
	HI20	Cranford Lane T S, Heathrow	Heathrow Airport Limited	1,295	993	-	5,000	1,295	1,295	-	-	32%	420	-	-
	HI21	Waybeards Farm, Hill End Road,	F J Heppelthwaite Solutions Limited (ex Hep Oils)	-	6,451	-	-	-	6,451	-	-	100%	6,451	-	-
Subtotals sheet 2 (tpa)													231,478	4,000	3,524
Subtotal sheet 1(tpa)													851,490	15,000	225,000
Running Subtotal (tpa)													1,082,968	19,000	228,524

⁶² Formerly operated by Bridgemarts/Gowing & Pursey. Site allocated for consolidation of industrial, aggregates and waste facilities so capacity retained.

⁶³ As confirmed by operator survey.

LPA	Site Id	Site Name	Operator	Capacity assessed in WLWP 2015	WDI 2019-2023 Peak input +15%	Consented Capacity	Permit Limit	Assessed Capacity	Capacity for HIC Waste	Capacity for Hazardous Waste	Capacity for C, D & E Waste	Recovery Rate	Recovery Capacity for HIC Waste	Recovery Capacity for Hazardous Waste	Recovery Capacity for C, D & E Waste
Hillingdon	HI24	Heathrow Depot	FM Conway	-	193,490 ⁶⁴	-	300,000	193,490	77,396	38,698	77,396	100%	77,396	38,698	77,396
	HI25	Central Depot Harlington Rd	Hillingdon Council	-	5,710	-	9,500	9,500	9,500	0	0	100%	9,500 ⁶⁵	0	0
	HI27	Unit 1 & 2 Pump Lane	Personnel Hygiene Services Ltd	-	90,976	-	-	90,976	90,976	0	0	100%	90,976	0	0
	HI28	Hayes Transfer Station	Suez Recycling & Recovery UK Ltd	59,150 ⁶⁶	92,393	-	375,950	100,000 ⁶⁷	100,000	0	0	100%	100,000	0	0
Hounslow	HO05	Mayer Parry, Brentford	European Metal Recycling Limited	63,025	73,671	-	74,999	74,999	74,999	0	0	100%	74,999	0	0
	HO07	Brentford Aggregate MRF ⁶⁸	Day Group Ltd	-	475,209	-	775,000	555,000 ⁶⁹	255,000 ⁷⁰	0	300,000	100%	255,000	0	300,000
	HO09	ATS Building, Amberley Way	Rubber Recycling Solutions Ltd	-	7,656	-	25,000	7,656	7,656	0	0	100%	12,000 ⁷¹	0	0
Running Subtotal sheet 3(tpa)													619,871	38,698	377,396
Running Subtotal sheet 2(tpa)													1,082,968	19,000	228,524
Running Subtotal (tpa)													1,702,839	57,698	605,920

⁶⁴ Site input composed of bituminous materials (both hazardous and non-hazardous) plus street sweepings which are from LACW sources i.e. HIC. So capacity split 40% non-haz CDEW, 40% non-haz LACW and 20% hazardous.

⁶⁵ As advised through operator survey

⁶⁶ Allocated site assessed capacity in WLWP 2015.

⁶⁷ As advised through operator survey

⁶⁸ This facility is a strategic site for recycled aggregate production from both C, D & E waste and incinerator bottom ash from a number of locations outside London.

⁶⁹ Capacity value amended to reflect actual capability as advised by operator following Reg 18 representations.

⁷⁰ The permit allows up to 255,000tpa of ash and 500,000 tpa of CDE waste processing inc glass. Given ash arises from the incineration of HIC waste it is taken to manage apportioned waste through recycling.

⁷¹ As advised through operator survey

LPA	Site Id	Site Name	Operator	Capacity assessed in WLWP 2015	WDI 2019-2023 Peak input +15%	Consented Capacity	Permit Limit	Assessed Capacity	Capacity for HIC Waste	Capacity for Hazardous Waste	Capacity for C, D & E Waste	Recovery Rate	Recovery Capacity for HIC Waste	Recovery Capacity for Hazardous Waste	Recovery Capacity for C, D & E Waste
Hounslow	HO11	Southall Lane Depot	Lampton Recycle 360 Ltd	-	26,702	30,000	-	30,000	30,000	0	0	100%	30,000	0	0
	HO12	Initial Washrooms (Brentford) Service Centre	Rentokil Initial UK Ltd	2,014	6,184	-	4,999	6,184	4,103	2,081	0	53%	-	1,094	0
	HO13	Isleworth Site Fleming Way Trading Est Isleworth	Citron Hygiene (UK) Ltd	-	687	-	75,000	687	506	181	0	92%	463	166	0
Richmond Upon Thames	R02	The Royal Botanic Gardens, Kew	The Royal Botanic Gardens, Kew	-	1,024	-	5,000	1,024	1,024	0	0	100%	5,000 ⁷²	0	0
	R03	Langhorn Depot Twickenham	Richmond uT Council	173,550 ⁷³	26,702	-	60,000	26,702	26,702	0	0	100%	26,702	0	0
Subtotals sheet 4 (tpa)													62,165	1,260	0
Running Subtotal sheet 3(tpa)													1,702,839	57,698	605,920
Totals (tpa)													1,765,004	58,958	605,920

⁷² Confirmed through operator survey.

⁷³ Allocated site assessed capacity in WLWP 2015

Appendix 4: Sites identified as providing capacity for Excavation Waste Management (85% threshold)

Borough/ LPA	Site Identifier	Site Name/Location	Operator	EW % input ⁷⁴ 2023	Capacity assessed in WLWP 2015	WDI 2019- 2023 Peak input +15%	Consented Capacity	Permit Limit	Assessed Capacity ⁷⁵
Brent	B04	Neasden Sidings	Quattro obo WRG (Midlands) Ltd	96%	-	199,290	-	250,000	250,000
Brent/ OPDC	B08	Willesden F Sidings Rail Freight Terminal	Cappagh Public Works Ltd	100%	-	10,400	-	75,000	10,400
Ealing/ OPDC	E11	Willesden Euro Terminal	Skanska Construction UK Ltd	100%	-	1,092,557	-	3,000,000	600,000 ⁷⁶
Hillingdon	HI15	Skip Lane Harvil Road Harefield	Thames Materials Ltd	99%	-	766,031	-	-	766,031
Total (tpa)									1,626,431

⁷⁴ The % of total input to the site reported in the WDI 2023 as being of a waste type that would be classed as excavation waste.

⁷⁵ See text (para 4.19) for method applied to arrive at assessed capacity value.

⁷⁶ Value revised down to reflect mean of pre HS2 inputs.

Appendix 5: Assessing capacity at sites exempt from permitting

- 8.1 11 sites operating under certain exemptions from environmental permitting registered by the EA on its public register were identified initially and the West London LPAs had confirmed that none of these sites were subject to planning enforcement action at the time of writing. The exemption register was checked for these sites in July 2026 and it was found 4 of the 11 were no longer registered at a west London address. The remaining 7 are listed in Table 9 below along with their respective expiry dates.

Table 9: Additional sites with Registered Exemptions not considered to be unlawful

Site Identifier	Site Name/Location	Operator	Exemption Registered Under	Notes
B17	Unit G13, Atlas Business Centre, Oxgate Lane	WEEE Technology Ltd	Repairing or refurbishing waste electrical and electronic equipment (WEEE)	Expires 20/10/2026
R05	29-31, Lower Richmond Road, SW14 7EZ	Sullivans Of Mortlake Limited	Recovering scrap metal	Expires 16/07/2028
E21	305, Horn Lane, Acton, W3 0BP	Horn Lane Metals Ltd		Expires 15/12/2027
B19	8 Marsh Road, Alperton Lane	Robinsons Recycling Limited	Manually treating waste	Expires 07/11/2026
E22	89 Fraser Road, Perivale	Mario Clean Kingdom Ltd	Preparatory treatments (baling, sorting, shredding etc) Sorting mixed waste	Expires 30/07/2027
E23	9b, Balfour Business Centre, Balfour Road, Southall, UB2 5BD	Sams Recycling Ltd	Preparatory treatments (baling, sorting, shredding etc)	Expires 28/05/2029

- 8.2 As these sites are not currently subject to environment permits, they do not submit returns to the Environment Agency that get reported through the WDI. Therefore, their capacity has been assessed with reference to previous Government estimates as shown below. Further explanation of the Methodology applied is included in this Appendix. It should also be noted that just because a site may not be subject to an environmental permit or a planning consent for waste and therefore falls outside the definition of an existing waste site set out in the London Plan, does not mean it cannot be identified for safeguarding through a local plan, such as the Proposed Submission WLWP, should the LPAs producing the plan wish to do so. Following the introduction of reforms of the exemption system, most business now have to pay to register waste exemptions. The introduction of a charge will deter registrations that have in the past been made on a precautionary basis and given some exempt activities such as scrap metal dealing are now subject to a subsistence fee of over a thousand pounds, the incentive to seek a permit may be increased, so a migration across to permitting may be expected in time.

- 8.3 While the national method identified 21 exempt activity types that might manage C&I waste, at end 2024 only 5 types were registered in west London (as displayed in the fourth column of Table 9) that might offer qualifying capacity for the management of HIC waste. Using the national estimates for tonnages managed at each type, tonnages have been estimated for west London as set out in Table 10 below.

Table 10: Tonnage attributed to registered exempt activities within West London

Source: Applying Defra Reconcile Estimation Method 2014 to EA Exemption Register downloaded November 2024

Exemption Code	Exempt Activity	Number Registered in West London	Assumed Capacity Per Exemption (tpa)	Tonnes managed per annum
T4	Preparatory treatments (baling, sorting, shredding)	2	5,000	10,000
T9	Recovering scrap metal	2	2,500	5,000
T11	Repair and refurbishment of WEEE	1	1,000	1,000
T10	Sorting mixed waste	1	520	520
T12	Manually treating waste	1	60	60
Total (tpa)				16,580

- 8.4 This gives an estimated total quantity of HIC waste management capacity through permitting exemptions within the Plan area of just over **c16,580 tpa**. All the above activities would qualify under the London Plan definition as involving the management of waste within London through reuse or recycling activities. Therefore, this capacity may also be counted towards the management capacity available within the west London for HIC waste subject to the LP apportionment. However, it is not intended to safeguard any of these sites through the Proposed Submission WLWP so this additional capacity has not been counted.
- 8.5 With respect to assessing capacity at sites exempt from environmental permits National Planning Practice Guidance advises the following:

How should waste planning authorities assess capacity of sites exempt from environmental permits?

Sites that operate under an exemption from the environmental permitting regime are not obliged to report on the amount of waste they handle. Some assessment of maximum capacity may be made through reference to the maximum amounts of waste permitted under the exemption (information on exempt sites is available from the [Environment Agency](#)). If a waste planning authority is concerned that exempt sites are having a significant impact on local capacity, it may wish to investigate this further. This may involve detailed surveys or obtaining a sample of surveys and extrapolating results.

Paragraph: 025 Reference ID: 28-025-20141016

- 8.6 Waste managed at exempt sites was counted as contributing towards C&I waste arisings in the point of production based national commercial⁷⁷ and industrial waste production estimation methodology (known as 'Reconcile') applied in 2009. This was done by extrapolating from the numbers of exemptions registered. However, unlike permitted facilities, there is no requirement for exempt facility operators to report actual tonnages received but there are tonnage limits specified for each exempt activity.
- 8.7 Therefore, an estimate of the tonnage that may be managed at each can be made taking the number of exemptions registered within a particular WPA. For the purpose of estimating C&I waste (that forms part of HIC to which the LP apportionments apply) that is handled through exempt sites, the national Reconcile method considered whether an exemption is likely to handle a significant volume of material not captured elsewhere in the management chain, to identify the activities that could make a notable contribution to C&I waste generation estimates. From a total of 57 types of exempt activity, the Reconcile methodology selected 21 for inclusion in the previous national estimates.
- 8.8 For the 21 selected exempt activities, a total annual tonnage per exemption was estimated following an assessment of the theoretical annual throughput based on the specified limits and a degree of expert judgment. The assumed annual throughput per type of exempt activity was then multiplied by the number of exemptions registered against each activity to generate a total tonnage managed value. This value was included in the national total for C&I waste arisings in 2009.

⁷⁷ *New Methodology to Estimate Waste Generation by the Commercial and Industrial Sector in England* DEFRA Project Report Final EV0804 August 2014