

Proposed Submission West London Waste Plan

Waste Management Topic Paper

Regulation 19

July 2026

BPP Consulting Document Control

Project: Proposed Submission West London Waste Plan

Report: Waste Management Topic Paper

Version Description: Regulation 19

Version No: 3.0

Date: 23.07.2026

Version No.	Version Description	Author	Date	Reviewed	Date
1.0	Draft for LPA review	Alan Potter (Partner)	21.11.2025	LPAs	25.11.2025
2.0	Regulation 18 Consultation Draft	Alan Potter (Partner)	08.12.2025		
3.0	Regulation 19 Consultation Draft	Alan Potter (Partner)	16.07.2026	LPAs	23.07.2026

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Note to Reader

This paper is based on the latest position regarding waste management capacity in the Plan area at the time of finalising (July 2026). Therefore, it uses slightly different values for capacity than those set out in the Regulation 19 Proposed Submission WLWP (May 2026). For clarity this is intentional and reflects the actual position as set out in the corresponding updated Capacity Assessment Report (July 2026).

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Abbreviations and Glossary

Abbreviations

Acronym	Full Term
CHP	Combined Heat and Power
DEFRA	Department for Food & Rural Affairs
EA	Environment Agency
EfW	Energy from Waste
EWC	European Waste Catalogue
HIC	Household, Industrial, and Commercial (Waste)
HRRC	Household Reuse & Recycling Centres
LACW	Local Authority Collected Waste
LCA	Lifecycle assessment
LLW	Low Level Radioactive Waste
LP	London Plan
LPA	Local Planning Authority
MBT	Mechanical Biological Treatment
MSW	Municipal Solid Waste
NPPF	National Planning Policy Framework (last updated 12 December 2024)
NPPW	National Planning Policy for Waste (last updated 16 October 2014)
OPDC	Old Oak & Park Royal Development Corporation
PPG	Planning Practice Guidance
RWS	Resources & Waste Strategy (2018)
WDI	Waste Data Interrogator
WDF	Waste Data Flow
WLLPAs	West London Local Planning Authorities
WLWA	West London Waste Authority
WPA	Waste Planning Authority

Glossary

Term	Definition
Apportionments	Tonnages of HIC waste allocated to each London Borough through the London Plan for provision of qualifying management capacity.
Anaerobic Digestion	A process to manage organic matter including green waste and food waste broken down by bacteria in the absence of air, producing a gas (biogas) and nutrient rich solid or liquid (digestate). The biogas can be used to generate energy either in a furnace, gas engine, turbine or to power vehicles, and digestate can be applied to land as a fertiliser.
Asset Management Plans	Plans produced by water companies setting out business plan for next five-year period. These are submitted to Ofwat for scrutiny prior to adoption.
Biogenic	Material within the waste stream that has been generated by the bio-cycle and was growing in the last hundred or so years. Examples include food, paper, garden waste, wood/timber.
Circular Economy	The circular economy means decoupling economic activity from the consumption of resources. It is based on three principles: Design out waste and pollution; keep products and materials in use; regenerate natural systems.
Combined Heat and Power (CHP)	The harnessing of both electricity and heat from power generating plants in this case incinerators burning waste.
Commercial Waste	Waste arising from premises which are used wholly or mainly for trade, business, sport, recreation or entertainment as defined in Schedule 4 of the Controlled Waste Regulations 1992.
Composting	A process in which biodegradable waste (such as green waste and kitchen waste) is broken down in aerobic conditions by naturally occurring micro-organisms to produce a material suitable for use as a soil improver.
Department for Food & Rural Affairs	The UK Government department responsible for developing national waste management policy.
Deposit Return Schemes	Scheme to incentivise return of single-use drinks containers for recycling.
Energy from Waste	The conversion of the calorific value of waste into energy, normally heat or electricity through applying thermal treatment of some sort. May also include the production of gas that can be used to generate energy.
Environment Agency	The body responsible for the regulation of waste management activities through issuing permits to control activities that handle or produce waste. It also provides up-to-date information on waste management matters and deals with

	other matters such as water issues including flood protection.
Environmental Permits	A regulatory document that sets out legally enforceable parameters within which regulated waste management facilities must operate, issued by the Environment Agency.
Extended Producer Responsibility	Scheme to introduce management obligations on entities that put household packaging waste and packaging onto the UK market.
European Waste Catalogue	Comprehensive listing of wastes, divided into 20 chapters, most of which relate to the type of industry that produced the waste, although some are based on materials and processes. Each waste type is assigned a unique six-digit code. The EWC is transposed into UK law through The List of Wastes (LOW) Regulations.
Foul sewer	A system of underground pipework maintained by the local statutory sewerage undertaker that carries used and dirty water to a wastewater treatment plant for cleansing.
Gasification	A thermal process that converts carbonaceous materials into gases, such as syngas, that may be used for energy production or chemical synthesis.
Household Waste	Waste from households collected through kerbside rounds, bulky items collected from households and waste delivered by householders to household waste recycling centres and "bring recycling sites". along with waste from street sweepings, and public litter bins.
Household, Industrial and Commercial Waste	Combined household, industrial and commercial waste streams (see separate definitions)
Household Reuse & Recycling Centres	A waste management facility provided by WLWA, where members of the public living in west London may take their household waste for management. (aka Household Waste Recycling Centres)
Industrial Waste	Waste from any factory and any premises occupied by industry (excluding mines and quarries) as defined in Schedule 3 of the Controlled Waste Regulations 1992.
Inert waste	Waste which is neither chemically nor biologically reactive and will not decompose or will only do so very slowly. Examples of this are soils, concrete, and bricks.
Life Cycle Assessment (LCA)	Life Cycle Assessment involves an analysis of the burden provision of a product or service makes on planetary resources and systems. It provides a framework for measuring the relative impact of different waste management options to facilitate decision making.

Local Authority Collected Waste	Waste collected by or on behalf of a local authority. Includes household waste and business waste and non-household fractions such as construction and demolition waste delivered to HRRCs.
Local Plans	Prepared by local planning authorities, which in this case are each of the West London LPAs (see definition below). Local Plans guide decisions on any future development proposals for an area. They set out policies to be used in decision making which are supported by a vision for how the local planning authority want the Plan area to develop.
Local Planning Authority	Local authority with responsibility for determining planning applications and producing local plans. In this case the west London Boroughs plus OPDC.
(The) London Plan	The Spatial Development Strategy for Greater London produced by the Mayor. The current version of the London Plan was published in 2021.
Low Level Radioactive Waste	Radioactive waste that contains relatively low levels of radioactivity. Includes items such as scrap metal, paper and plastics and smaller amounts come from medical and research facilities.
Mechanical Biological Treatment	A waste facility that combines a sorting facility with a form of biological treatment such as composting, bio-drying or anaerobic digestion
Municipal Waste (MSW)	A term that covers household waste and household-like commercial and industrial waste (e.g. from offices or hotels) regardless of its fate.
Non-hazardous waste landfill	A landfill permitted to accept non-inert (biodegradable) wastes e.g. municipal and commercial and industrial waste and other non-hazardous (including inert) wastes. Some may also accept certain hazardous waste if a special cell is constructed.
Non-inert waste	Waste which is either chemically or biologically reactive and will decompose over time. All waste other than inert waste (see entry) and hazardous waste.
Old Oak & Park Royal Development Corporation	A Mayoral Development Corporation (MDC), established by the Mayor of London to secure the regeneration of the Old Oak and Park Royal Opportunity area, spanning land in three London boroughs – parts of Ealing, Brent and Hammersmith & Fulham. For the purposes of this report, the term OPDC relates solely to that part of LB Brent and Ealing that falls under its jurisdiction as local planning authority.
Ofwat	The Water Services Regulation Authority, or Ofwat, is the body responsible for economic regulation of the privatised water and sewerage industry in England and Wales.
Planning Practice Guidance	Guidance published by central Government to support plan making and development management decision making. Applicable across England.

Pyrolysis	Thermal process to promote the decomposition of organic (carbon-based) materials which, occurs in the absence or near absence of oxygen, and it is thus distinct from combustion (burning).
'R1' Recovery status	The definition in the revised Waste Framework Directive for a 'recovery' operation requires municipal waste incinerators to demonstrate a plant will achieve a minimum threshold of efficiency in converting municipal waste to energy. Plants operating at or above the stipulated thresholds can be classified as 'recovery operations' for the purposes of the waste hierarchy. Incinerators operating below the threshold are classed as 'disposal'.
Waste Data Interrogator	Environment Agency compiled dataset for waste accepted and removed from sites provided by operators of facilities subject to environmental permits for waste activities.
Waste Data Flow	Online data portal for use by English local authorities to report on LACW management data to central Government (DEFRA).
Waste Disposal Authority	A local authority responsible for managing the waste collected by councils acting as waste collection authorities and the provision of household waste recycling centres. In this case WLWA
(The) Waste Hierarchy	Priority listing of management methods for waste set out in the Waste Framework Directive, transposed into UK law. To be applied in priority order i.e. from the top down.
West London Boroughs	The London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames to which responsibility for collection of LACW and provision of management capacity for HIC waste apportioned through the London Plan falls i.e. excluding OPDC.
West London Local Planning Authorities	The west London Boroughs plus the OPDC that are collaborating to produce a joint waste plan for west London as waste planning authorities for their respective areas.
West London Waste Authority	The statutory Waste Disposal Authority (WDA), responsible for the disposal of LACW collected by or on behalf of the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames

1 Executive Summary

- 1.1 This document provides an introduction to waste management in west London. It provides background information and justification for the approach and policies related to waste management included in the Proposed Submission Regulation 19 West London Waste Plan (new WLWP). The document references several key documents that have informed the preparation of this topic paper, including assessments of existing waste management capacity and forecasts for different types of waste arising in west London.
- 1.2 The main types of waste produced in the Proposed Submission WLWP area are:
- Local Authority Collected Waste (LACW)
 - Commercial and Industrial Waste (C&I waste)
 - Construction, Demolition and Excavation Waste (C, D & E)
 - Hazardous Waste
 - Wastewater and Sewage Sludge
- 1.3 Local Authority Collected Waste (LACW) consists of waste collected by, or on behalf of, a local authority and includes household waste, bulky waste, street sweepings, and green waste. In 2023/24, 0.65 million tonnes of LACW was generated in west London, with 0.43 million tonnes managed through incineration with Energy from Waste (EfW), 0.2 million tonnes recycled or composted, and only 101 tonnes managed through disposal to landfill¹.
- 1.4 Commercial and Industrial waste (waste produced by business and industry) does not have readily available data on tonnages generated in west London. Projected tonnages of household, industrial, and commercial waste (HIC) are collectively accounted for in the London Plan (2021) and tonnages apportioned to each Borough to plan to provide management capacity for.
- 1.5 Construction, Demolition, and Excavation Waste (C, D & E) consists mainly of inert materials such as soils, stone, concrete and brick, as well as non-inert elements like wood, metals, plastics, and plasterboard. Different types of C, D & E waste require different management, such as separation of construction and demolition waste for recycling or deposit of excavation waste on land for beneficial purposes e.g. landscaping and engineering works (depending on the nature of the waste). It has been estimated that 3.3 million tonnes of C, D & E waste was generated in west London in 2023, with 35% arising from construction and demolition activity and 65% from excavation works.

¹ The difference between the individual values and the total c.0.02Mt is principally made up by losses at intermediate plants that currently manage LACW arising in west London.

- 1.6 In west London hazardous waste arises mainly from construction and demolition activity, vehicle maintenance and/or dismantling activity, and healthcare. It is estimated that nearly 90,000 tonnes of hazardous waste was produced in west London in 2023, 62% of which was contaminated demolition and construction waste which may be considered a one-off. The relatively small amounts of hazardous waste arising on an ongoing basis and the need for specialist facilities, means this waste may travel further afield for management. There is no policy expectation that it is to be managed within a specific Plan area.
- 1.7 Wastewater and the sewage sludge that results from its treatment is managed by Thames Water. Wastewater treatment capacity is planned for in 'Asset Management Plans', and a major upgrade is underway at Mogden Sewage Treatment Works located in London Borough of Hounslow to supply biomethane back to the national supply grid.
- 1.8 Agricultural waste arisings in west London are small, with quantities requiring offsite management assessed as being so low as to not require specific provision of management capacity.
- 1.9 Low-level radioactive waste (LLW) is mainly produced from hospitals, research establishments, and the nuclear industry. It is likely that very little LLW is produced in west London, and any resulting LLW will continue to be managed via existing arrangements.
- 1.10 Waste management facilities in west London generally require planning consent for a waste use granted by each Local Planning Authority (LPA) plus Environmental Permits granted by the Environment Agency (EA). At the time of writing there were around 80 such sites in west London, managing waste.
- 1.11 In summary, this document provides an overview of the different types of waste generated in west London and the existing waste management infrastructure. It highlights the need for planning policies to encourage the management of waste in accordance with the waste hierarchy and the importance of considering specific waste characteristics for appropriate management technologies.

2 Introduction

- 2.1 This Topic Paper presents the background evidence on waste management in west London that underpins the Regulation 19 Proposed Submission WLWP (2026). The Topic Paper includes justification for the approach and policies relating to waste management, which is in addition to that included as supporting text in the Plan.
- 2.2 The preparation of this Topic Paper, has been informed by the London Plan 2021 and the following evidence base documents:
- Assessment of Existing Waste Management Capacity in West London (Updated July 2026)
 - Baseline & Forecast for Construction, Demolition & Excavation Waste Arising in West London to 2042 (Updated July 2026)
 - Baseline & Forecast for Hazardous Waste Arising in West London to 2042 (Updated July 2026); and
 - Identification of Strategically Significant Waste Flows from West London (Updated July 2026).
- 2.3 This paper sets out the current position in west London with regards to waste arisings, current management arrangements and existing management capacity and so underpins policies included in the Regulation 19 Proposed Submission WLWP.

3 Existing waste management

- 3.1 The legal definition of waste, set out in section 75(2) of the Environmental Protection Act 1990, is “*any substance or object which the holder discards, or intends or is required to, discard*”. The key concept relates to the producer or holder's intention regardless of whether the material or item may have a value to the recipient.
- 3.2 The main types of waste produced in the West London Waste Plan area are:
- Local Authority Collected Waste (mainly household waste) (LACW);
 - Commercial and Industrial Waste (waste from businesses and industry) (C&I waste);
 - Construction, Demolition and Excavation Waste (C, D & E);
 - Hazardous Waste from various sources; and,
 - Wastewater and Sewage Sludge.
- 3.3 The principal objective of planning for the management of waste² is to protect the environment and human health by:
- preventing or reducing the generation of waste;
 - where its production is unavoidable, reducing the adverse impacts of its generation and management; and
 - reducing the overall impacts of the use of resources from which waste may arise and improving the efficiency of such use.

By paying regard to the above objectives, the overall burden of the waste created by society should reduce and the value it contributes back to the economy maximised.

Waste Datasets

Environment Agency Waste Data Interrogator (WDI)

- 3.4 The Waste Data Interrogator is the Environment Agency dataset that reports annual tonnages and types of waste accepted and removed from sites with environmental permits for waste management activities. The WDI is the principal dataset used to account for waste arising within particular Plan areas. It uses the classification of waste set out in the European Waste Catalogue (EWC) and relies on data supplied by operators of permitted facilities in England.

² See [The Waste \(England and Wales\) Regulations 2011](#) (as amended) and The Waste (Circular Economy) (Amendment) Regulations 2020.

Defra Wastedataflow (WDF)

- 3.5 Wastedataflow is an online data portal for use by English local authorities to report on LACW management data to central Government (DEFRA). Data submitted is used to report on national LACW management performance.

Local Authority Collected Waste

- 3.6 Local Authority Collected Waste (LACW) consists of waste that comes into the control of, the local authority i.e. the council in whose borough it arises. LACW collected by, or on behalf of, the west London Boroughs includes household waste collected from homes (residual, dry mixed recycling and food waste), bulky waste and other waste delivered to Household Waste Recycling Centres (HWRCs) provided by each Borough, street sweepings, green waste from the maintenance of public parks and open spaces, and a small quantity of clinical waste³. LACW can also include waste collected from businesses, known as 'trade waste', if a business specifically requests the local authority to collect it. Waste collected by a private contractor from businesses is known as 'Commercial and Industrial Waste'.
- 3.7 The LACW produced in west London is managed under a contract let and overseen by the West London Waste Authority (WLWA) - an entity that performs the waste disposal authority function of the six Boroughs⁴. In 2023/24 0.65 million tonnes of LACW was generated in west London. Of this, c.0.55 million tonnes arose from households. Of the total, 0.43 million tonnes was managed through incineration with Energy from Waste (EfW), 0.2 million tonnes was recycled or composted, with very little managed through disposal to landfill. The above data is based on returns submitted by WLWA to central Government via an online reporting portal known as WasteDataFlow.
- 3.8 WLWA adopted a Business Plan for the management of west London's LACW, covering the period 2020-25⁵. This Business Plan sets out the strategic aims and aspirations for resources and the management of LACW, for which the Partner Authorities have responsibility, between 2020 and 2025. Steps that the Partner Authorities are taking to improve performance, include development of Borough Reduction and Recycling Plans submitted to the Mayor of London for scrutiny against the Mayor's London Environment Strategy⁶. These Plans and

³ Household clinical waste is not deemed hazardous unless a particular risk has been identified (based on medical diagnosis).

⁴ <https://westlondonwaste.gov.uk/>

⁵ West London Waste Authority Business Plan 2020-2025 https://cdn2.assets-servd.host/westlondon-waste/staging/assets/resources/Archive/New-BusinessPlan-2020-25_Final.pdf

⁶ <https://www.london.gov.uk/programmes-and-strategies/environment-and-climate-change/london-environment-strategy>

Strategies have also informed the development of the Regulation 19 Proposed Submission WLWP. It should be borne in mind that while most visible, LACW only forms part of the total quantity of waste arising in west London that requires management.

- 3.9 WLWA's principal contract for the management of Local Authority Collected Waste (LACW) is with West London Energy Recovery Limited (WLERL). It involves the acceptance of residual waste from Boroughs at two rail-linked transfer stations operated by Suez Recycling & Recovery UK Ltd, from where most of the waste is processed into RDF and transferred by rail to Severnside Energy Recovery Centre (SERC) located in South Gloucestershire for thermal treatment and energy recovery.

Commercial & Industrial Waste

- 3.10 While national planning policy identifies Commercial and Industrial waste as a separate waste stream to LACW, in the London Plan it is combined with LACW and collectively referred to as household, industrial and commercial waste, or 'HIC waste' for short. These waste types are grouped together as there are similarities between their characteristics, particularly that element of commercial waste classed as 'municipal' alongside LACW, and hence they may be managed through similar types of waste management facility.
- 3.11 Data for tonnages of C&I waste generated in west London has been estimated through the London Plan as being 1.5Mt in 2021 rising to 1.6Mt in 2041 (see Table 1 for breakdown to Borough level). However data for actual management routes is not readily available due to the lack of clear definition in the available datasets⁷. Therefore, it is not possible to establish the management profile of this stream with the same degree of certainty as for LACW. However, for the purposes of planning for this waste stream, the London Plan apportionments determine the future combined need for the management of HIC waste within west London through to 2041.

⁷ The EWC categorises municipal waste under a single Chapter, Chapter 20, and this includes both LACW and waste arising from businesses. Differentiating between the data for C&I waste arisings and LACW reported in the Environment Agency Waste Data Interrogator, involves a complex process, and one that has not been taken in this case as the London Plan apportionments define the management requirements, or 'need', to be met through the Plan for these waste types combined together.

Construction, Demolition and Excavation Waste

- 3.12 C, D & E waste comprises waste arising from the construction and demolition activities, including excavation undertaken prior to construction. It consists mainly of inert materials such as soils, concrete, brick and tiles. Non-inert elements are also present in this waste stream such as wood/timber, metals, plastics, plasterboard, and green waste from site clearance works plus residual food wastes from canteens that construction workers attend. Hazardous waste (see below) may also arise particularly when development takes place on brownfield sites that have been affected by historical contamination such as former industrial sites like the land redeveloped for what is now the former Olympic Park.
- 3.13 Different types of C, D & E waste require different forms of management. For example, hard inert materials (such as concrete, brick and road planings arising from demolition and road maintenance) can be converted into materials which may be used to substitute for primary minerals in construction activities (referred to as recycled aggregate). Soft materials such as soils and sub-soils primarily arising from excavation work can be deposited for beneficial purposes such as the restoration of minerals workings (i.e. quarries) and engineering projects such as flood prevention schemes and acoustic bunds. The non-inert component such as metals and plasterboard may if separated be recycled back into products through manufacturing facilities. Ultimately there is very little C, D & E waste that cannot be recycled or recovered in some way. In light of this the current London Plan sets high management targets for this stream, distinguishing between the C&D and the E components. The current London Plan does not apportion quantities of C, D & E waste for management to individual Boroughs and specifically excludes provision for management capacity for excavation waste from the aim of London being net self sufficient in management capacity for principal waste streams by 2026.
- 3.14 The production of excavation waste in particular is influenced by large-scale infrastructure and development projects such as the Thames Tideway Tunnel, as well as commercial and residential developments, which means that peaks and troughs in its production are often observed with arisings not necessarily following a consistent trend.
- 3.15 In 2023 it is estimated that 3.3 million tonnes of C, D & E waste was generated in west London⁸. Of this 35% arose from construction and demolition activity while 65% arose from excavation works. This difference is significant because the London Plan sets separate targets for the management of excavation waste, to those applied to construction and demolition waste, and this is reflected in the approach taken with respect to the assessment of management

⁸ *Baseline & Forecast for Construction, Demolition & Excavation Waste Arising in East London to 2042 BPP Consulting November 2025*

capacity in the Regulation 19 Proposed Submission WLWP.

- 3.16 Data shows that at least 80% of the excavation waste arising was managed through recovery routes while at least 51% of C&D waste was managed through recovery which includes both recycling and management through other recovery methods (with only 7% disposed to landfill). The remainder in both cases was managed through transfer stations from where it would be transferred on to a final fate which from the datasets available is unknown.
- 3.17 Given it is a bulky and heavy waste type, C, D & E waste does not tend to travel significant distances from its source, unless transported by rail as indicated in the Review of Strategic Flows⁹.

Hazardous Waste

- 3.18 Hazardous wastes are categorised as those that are harmful to human health, or the environment, either immediately or over an extended period of time. In west London, hazardous waste arises mainly from: construction and demolition activity, vehicle maintenance and/or dismantling activity and healthcare. Types of hazardous waste include contaminated soils, infectious clinical waste and waste oils.
- 3.19 It is estimated that nearly 90,000 tonnes of hazardous waste was produced in west London in 2023¹⁰. The term 'hazardous waste' covers a wide range of waste types which each may require management at specialist facilities, such as hazardous waste landfills and high temperature incinerators. Given they generally arise in relatively small amounts, due to economies of scale, such facilities are often developed to manage quantities greater than that arising in a single Plan area. Therefore, this waste may travel further afield for management than most other waste types. For example, around 400 tonnes of hazardous waste was sent to a treatment site in Sandwell (West Midlands) for management in 2023, some 130 miles away from west London¹¹.

Wastewater and Sewage Sludge

- 3.20 Wastewater generally comprises effluent from homes and industrial and commercial premises and in some case surface water runoff from roads and other hard surfaces discharged to the foul sewer system from where it is channeled to wastewater or sewage treatment works for treatment¹². Output of this treatment is sewage sludge that may, if it meets certain parameters, be applied to land as a fertiliser in accordance with the *Sludge (Use in Agriculture)*

⁹ *Identification of Strategically Significant Cross Boundary Waste Movements*, BPP Consulting Updated July 2026.

¹⁰ *Baseline & Forecast for Hazardous Waste Arising in West London to 2042* BPP Consulting Updated July 2026

¹¹ *Identification of Strategically Significant Flows*, BPP Consulting Updated July 2026.

¹² These works can provide a valuable function in managing wastes other than wastewater, that arise in liquid and sludge form such as septic tank emptyings that serve properties not connected to the foul sewer.

Regulations 1989 and associated best practice guidance. Alternatively, the sludge can be treated either through anaerobic digestion or incineration. The cleaner effluent may be discharged to a watercourse in accordance with a discharge consent granted by the Environment Agency.

- 3.21 In west London, wastewater and the resulting sewage sludge are managed by Thames Water. Wastewater treatment capacity is planned for by Thames Water in its five year 'Asset Management Plans'. The water companies use information in the public domain to forecast when upgrades to wastewater treatment facilities will be required. Mogden Sewage Treatment Works, located in the London Borough of Hounslow, is the key facility serving west London being the third largest STW in the UK. Thames Water is currently installing a gas to grid system which will supply biomethane produced to up to around 4,000 homes in west London.¹³

Agricultural Waste

- 3.22 Given the relatively small amount of land subject to cultivation in west London arisings of agricultural waste are small, The Environment Agency dataset, the WDI, indicates there is very little agricultural waste produced in west London requiring the provision of off-site management facilities.

Low level radioactive waste

- 3.23 Radioactive waste is any material that is either radioactive itself or is contaminated by radioactivity and for which no further use is envisaged. Radioactivity can pose health risks when organisms are exposed to elevated levels, but potentially hazardous radioactive waste is not included in the definition of hazardous waste and is therefore accounted for separately. Most radioactive waste is produced from nuclear power stations and from the manufacture of fuel for these power stations. This is referred to as 'nuclear waste.' Radioactive waste also arises from nuclear research and development sites and Ministry of Defence sites. No such sites exist in west London.
- 3.24 Radioactive waste also arises from medical, industrial and research establishments such as hospitals and universities. Being of a low level of radioactivity this may be referred to as low level radioactive waste (LLW), or very low level radioactive waste (VLLW).
- 3.25 LLW consists mainly of paper, plastics and scrap metal items that have been used in hospitals, research establishments and the nuclear industry. It is likely

¹³ Poo power to heat homes in West London as Thames Water continues to reduce its carbon footprint 17 January 2024
<https://www.thameswater.co.uk/news/2024/jan/mogden-gas-to-grid>

that very little LLW is produced in west London, and according to the Environment Agency public register, ten organisations hold a total of eleven permits to keep and use radioactive materials in West London covering locations in Brent (3 locations), Harrow (1 location), Hillingdon (6 locations) and Richmond upon Thames (1 location). Any resulting LLW will likely continue to be managed via existing arrangements.

4 Waste Management Facilities

- 4.1 There is a multiplicity of ways in which waste may be managed. Much depends on the specific characteristics of the waste itself as this can determine its suitability for management through the application of different technologies. For example, only waste that may degrade when subject to biological processes is suitable for management through organic waste treatment technologies such as anaerobic digestion and composting. Similarly, only waste capable of combustion should be subjected to thermal treatment processes such as incineration, gasification or pyrolysis. The cleanliness of waste materials can play a major role when it comes to considering its suitability for onward recycling through facilities such as paper mills and glass factories¹⁴. This in turn may be heavily influenced by the collection methods applied and the facilities provided at the point where the waste arises.
- 4.2 In general, facilities where waste is managed require express planning consent for a waste use, other than the sites that use recycled material as feedstock to production processes. In addition, they also generally require Environmental Permits that in England are granted by the Environment Agency.

Existing Waste Management Estate in West London

- 4.3 The WLWP area has a range of permitted waste management facilities that handle waste both from within and beyond West London. Data for 2023 indicates there are around 80 sites in West London currently managing waste under environmental permits granted by the Environment Agency.
- 4.4 The principal types of waste management facilities within west London are as follows:
- C & D waste recycling facilities
 - HIC waste recycling facilities
 - Metal Recycling Sites
 - LACW road to rail transfer stations where conversion to RDF occurs (x2)
 - HRRCs (x6).
 - Excavation waste transfer stations (x4)

Figure 1 shows the distribution of the existing waste management facilities in west London proposed to be safeguarded through the Proposed Submission WLWP.

¹⁴ , These types of facilities generally fall outside the scope of being defined as waste uses in land-use planning.

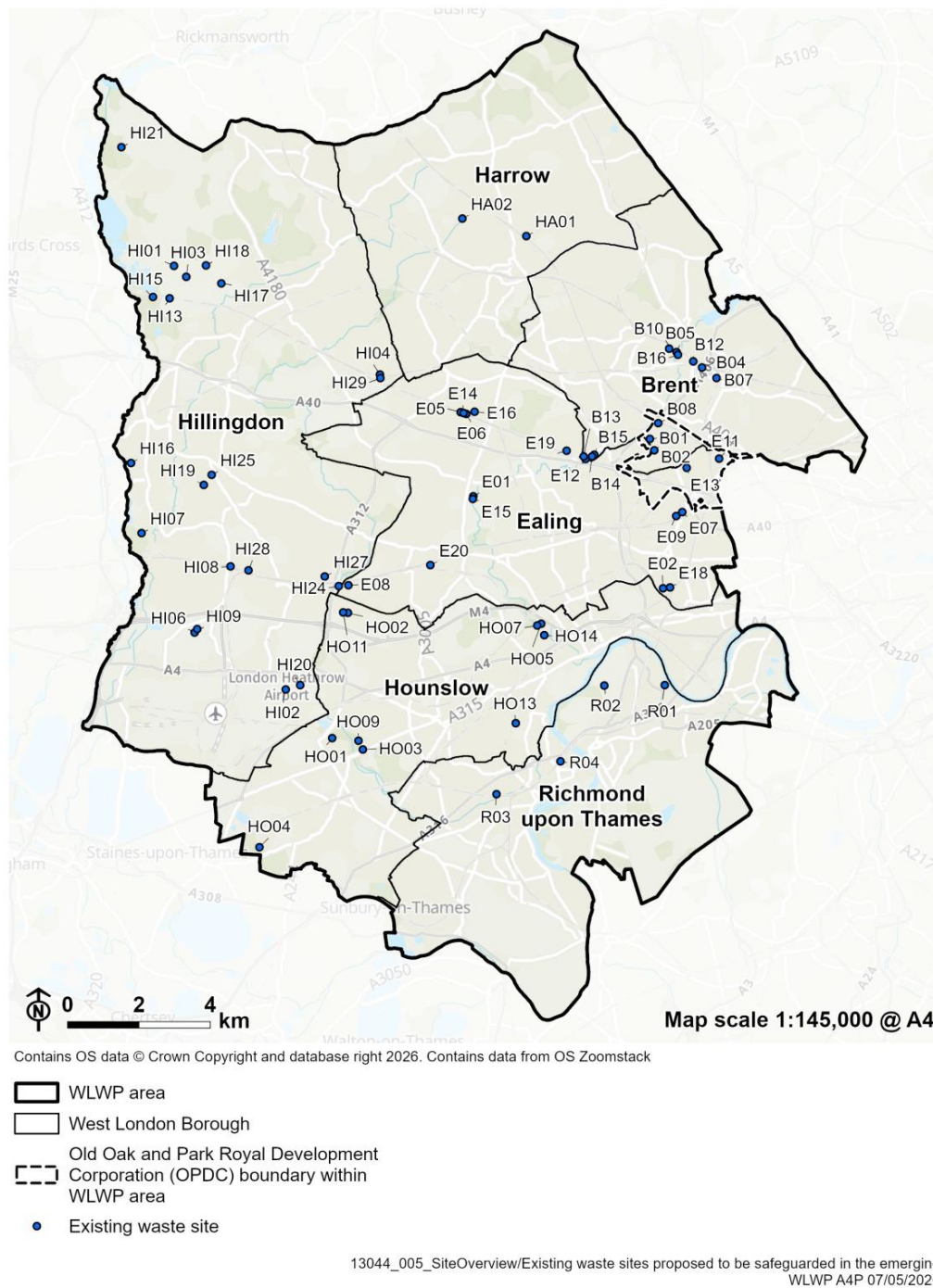


Figure 1: Map of Existing Waste Sites in West London Proposed to be Safeguarded

5 The Policy Context

5.1 The policy context within which the WLWP has been prepared is set out in Figure 2 below.

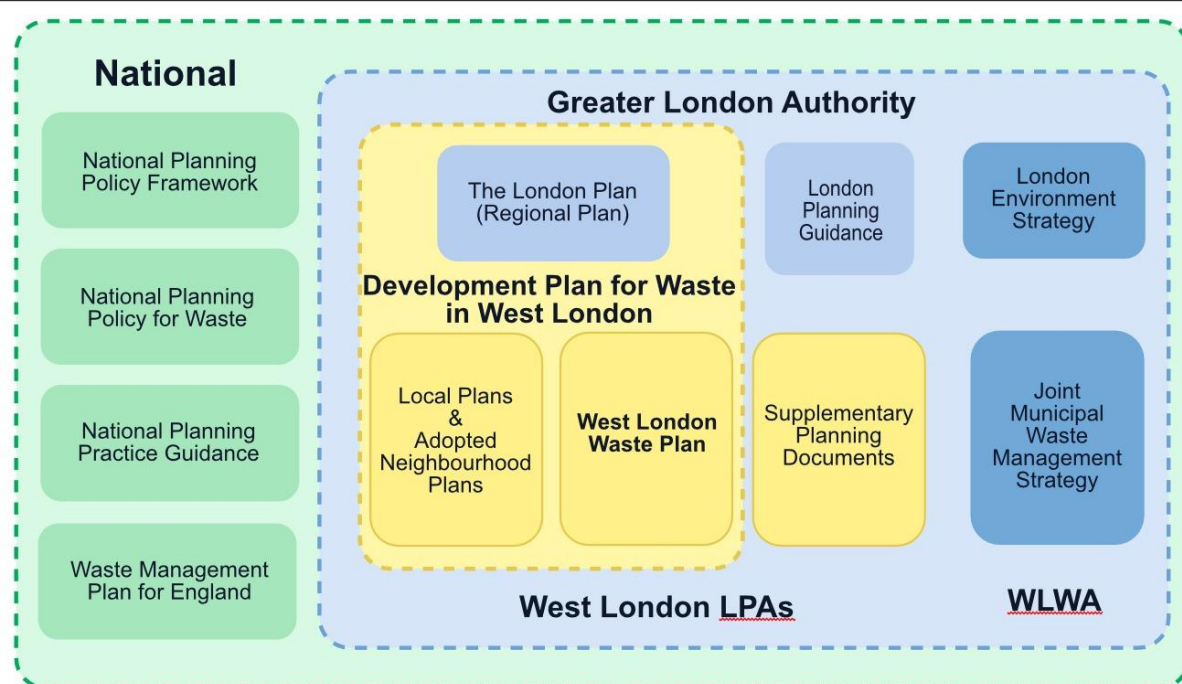


Figure 2 – The WLWP Within the Wider Policy Context

National Policy

5.2 The key objective of national policy for managing waste ¹⁵is to protect the environment and human health by:

- preventing or reducing the generation of waste;
- where its production is unavoidable, reducing the adverse impacts of its generation and management; and
- reducing the overall impacts of the use of resources from which waste may arise and improving the efficiency of such use.

5.3 The National Planning Policy for Waste 2014 (NPPW)¹⁶, associated Planning Practice Guidance (PPG) and the Resources and Waste Strategy for England 2018 (RWS)¹⁷ set the policy context for waste management in England. Whilst the National Planning Policy Framework (NPPF) does not contain policies specific to waste, its principles are also

¹⁵ See *The Waste (England and Wales) Regulations 2011* (as amended) and *The Waste (Circular Economy) (Amendment) Regulations 2020*.

¹⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

¹⁷ <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england> This was published under the 2016 to 2019 May Conservative government.

relevant. In addition the Waste Management Plan for England¹⁸ signposts policies concerning waste management in England in particular those included in the RWS as a route to demonstrating compliance with retained EU Waste Framework Directive requirements. This was updated in 2021 and as such is considered to be the most current expression of Government policy on the subject.

5.4 Both NPPW and RWS require application of the waste hierarchy in priority order as one of the key principles of achieving sustainable waste management. The ‘Waste Hierarchy’ sets out different ways of dealing with waste as shown in Figure 3 below. ‘Prevention’ is the preferred option with ‘Disposal’ at the bottom being the option of last resort.

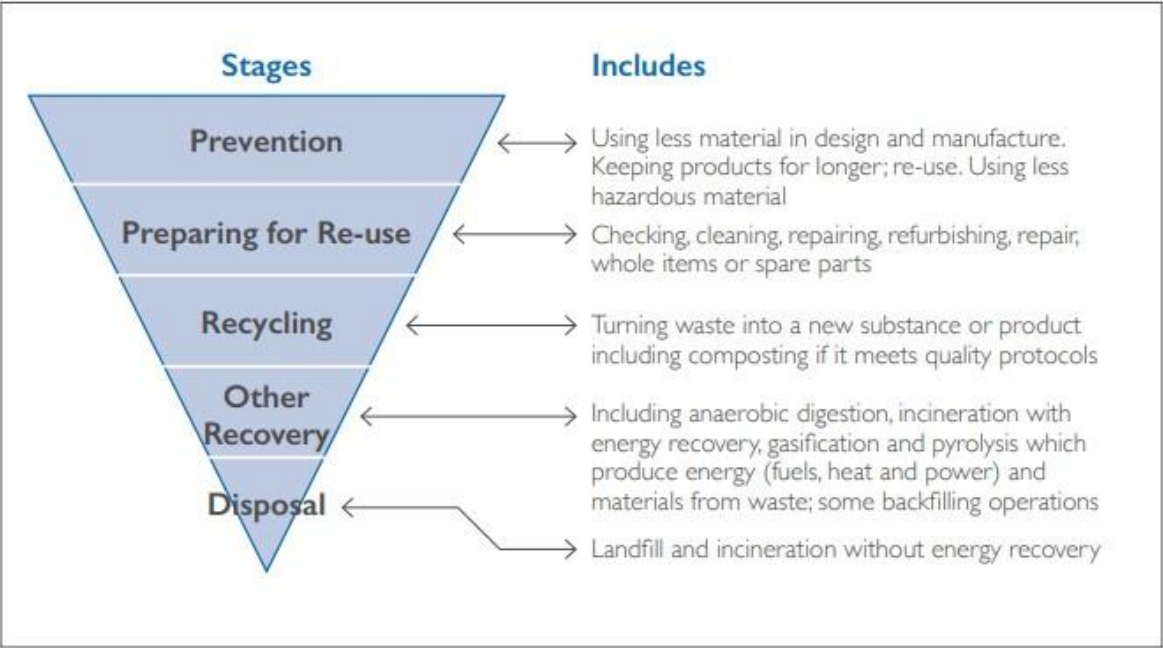


Figure 3 The Waste Hierarchy¹⁹

5.5 Although published in 2018, in the absence of an update, the RWS remains the national strategy for waste management in England, including how the country is to minimise waste and manage it more effectively through maximising opportunities to generate value from material that is both prevented from entering, and extracted from, the waste stream.

¹⁸ <https://www.gov.uk/government/publications/waste-management-plan-for-england-2021>

¹⁹ Source: *National Planning Policy for Waste*, MHCLG, 2014. It should be noted that the most recent Govt publication showing the hierarchy included anaerobic digestion in the recycling tier.

5.6 The RWS identifies five strategic ambitions:

- To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025;
- To work towards eliminating food waste to landfill by 2030;
- To eliminate avoidable plastic waste over the lifetime of the 25 Year Environment Plan;
- To double resource productivity by 2050; and
- To eliminate avoidable waste of all kinds by 2050.

5.7 The RWS is also concerned with ensuring that society's approach to waste aligns with the following circular economy principles:

- design out waste and pollution;
- keep products and materials in use; and
- regenerate natural systems.

Circular Economy

5.8 The role waste management plays in the cycle central to creating a more circular economy is illustrated in Figure 4 below.

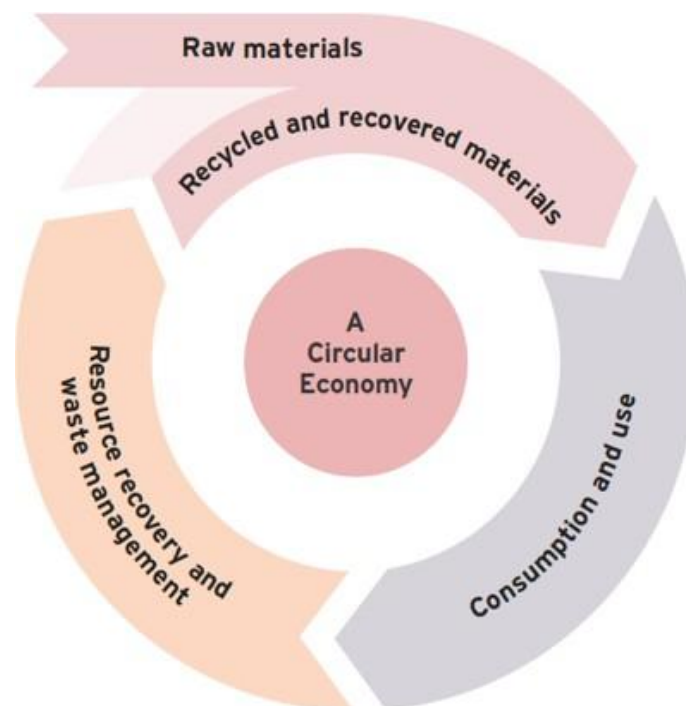


Figure 4 Circular Economy²⁰

²⁰ Source: Resources and Waste Strategy, DEFRA, 2018

5.9 The Circular Economy can also aid in tackling the climate emergency. When applied to the built environment, circular economy principles significantly reduce greenhouse gas emissions by avoiding extraction of raw materials, reducing production of construction materials, retaining embodied carbon and eliminating waste. In July 2023 the Sunak Conservative Government published its waste prevention plan titled 'Waste prevention programme for England: Maximising Resources, Minimising Waste'. This is considered further in the separate Circular Economy Topic Paper.

Environment Act 2021 Targets

5.10 The Environment Act 2021 requires the Government to set long-term, legally- binding environmental targets²¹, including those for resource efficiency and waste reduction. In response to this requirement the Government in power at the time set the following targets in its Environmental Improvement Plan 2023, which build on the targets in the RWS set out previously. These are as follows:

- eliminate avoidable waste by 2050 and double resource productivity by 2050;
- explore options for the near elimination of biodegradable municipal waste to landfill from 2028;
- eliminate avoidable plastic waste by 2042; and,
- halve 'residual' waste (excluding major mineral waste) produced per person by 2042.

5.11 The target for the reduction in residual waste is now enshrined in law through *The Environmental Targets (Residual Waste) (England) Regulations 2023* which came into force on 30 January 2023. The target is for the reduction of residual waste (excluding major mineral wastes) on a kg per capita²² basis by 50% by 2042 from 2019 levels (574 kg per capita). Accordingly, the residual waste long-term target is that by the end of 31 December 2042 the total mass of residual waste for the calendar year 2042 does not exceed 287 kg per capita in England as a whole. Routes counted towards waste being managed as residual are:

- sent to landfill in the UK;
- put through incineration in the UK;
- used in energy recovery in the UK and sent outside the UK for energy recovery.

²¹ <https://www.gov.uk/government/publications/environment-bill-2020/august-2020-environment-bill- environmental-targets>

²² Per head of population in England

- 5.12 The residual waste reduction targets are expected to be achieved through a combination of waste prevention and increased recycling rates. Government modeling has shown recycling rates may need to reach 75% by 2042. This is expected to be achieved through a combination of measures including adoption of a more consistent approach to recycling with a statutory requirement for the separate collection of at least five materials: glass; metals; plastics; paper; and, food waste, from all households and business premises by 2028 which came into force 31st March 2025²³, supported by Extended Producer Responsibility initiatives for certain products and materials, and a deposit return scheme relating to packaging waste. Where source separated materials need to be bulked up and/or treated (e.g. food waste) this may require provision of additional waste management facilities.
- 5.13 Alongside separate collection and extended producer responsibility initiatives for household and business waste, the Routemap for Zero Avoidable Waste in Construction was launched in 2021²⁴. To achieve zero avoidable waste by 2050, this includes the following targets:
- By 2040 eliminate all but hazardous C&D waste entering landfill.
 - By 2040 reduce soil to landfill by 75% based on 2020 level and reduce to zero by 2050 unless required for landfill operation purposes.
- Other targets may be set for construction waste reduction and recovery including cost reduction through designing out waste and material optimisation.
- 5.14 In addition to the above measures relating to construction, the NPPW requires that when determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that the handling of waste arising from the construction and operation of development maximises reuse and recovery opportunities, and minimises off-site disposal. Additionally, Chapter 2 of the National Planning Policy Framework (NPPF) recognises the need for the planning system to consider the prudent use of natural resources and waste minimisation in the pursuit of sustainable development. The National Planning Policy Framework and the National Planning Policy for Waste are material considerations when decisions on planning applications are being made and when local planning authorities are preparing local plans.

²³ *The Separation of Waste (England) Regulations 2025 SI140.*

²⁴ <https://www.constructionleadershipcouncil.co.uk/news/zero-avoidable-waste-routemap-launch/>

- 5.15 In light of the aforementioned targets and initiatives over the forthcoming plan period, a substantial shift towards a more sustainable waste management system is anticipated. This entails a heightened focus on recovering value from a wider range of materials and reducing the amount/proportion of waste buried or burnt. This may require additional and different waste management facilities, coupled with source/supply chain initiatives that extend beyond the scope of land-use planning for waste as currently understood/applied. The composition of waste requiring management is also expected to change over time, as it has done in the past.

Climate change

- 5.16 The production and management of waste needs to consider impacts on climate and how practices need to adapt in light of anticipated changes to the climate. This is considered in detail in the Climate Change Topic Paper.

Net self sufficiency

- 5.17 Self-sufficiency in terms of waste, as outlined in Article 16 of the EU Waste Framework Directive²⁵, refers to the principle that each Member State should aim to manage and dispose of its own waste within its borders, to the extent possible. This encourages national Governments to take responsibility for their own waste and is designed to reduce the need for cross boundary waste movements, which can create inequalities between countries. The principle applies at national level to England & Wales as a whole.
- 5.18 The principle of self-sufficiency has been adapted for local waste planning purposes to establish how much management capacity should be provided in each waste Plan area. Through the addition of the term 'net', this recognises that movements of waste occur between waste plan areas, as waste management is not generally confined to administrative areas. Movements can be beneficial for optimising the waste management system where economies of scale apply. This means there is no expectation that each tonne of waste produced in a particular plan area is to be managed within that plan area. Rather that, overall, there should be a balance of provision. The objective of net self- sufficiency is to ensure that there is sufficient capacity to manage the tonnage of waste equivalent to that predicted to arise within a plan area.
- 5.19 The degree to which a plan area is net self-sufficient can be established by comparing the available capacity within a plan area with the projected capacity requirements²⁶. A snapshot of the position for west London is presented in Figure 5, based on actual reported movements in 2023.

²⁵ <https://eur-lex.europa.eu/eli/dir/2008/98/oj>

²⁶ The London Plan applies the principle of net self sufficiency to waste management across London (see later section).

5.20 It should be noted that Figure 5 presents:

1. a snapshot in time for a single year; and
2. is not necessarily a true representation of net -self-sufficiency as actual inputs to facilities in 2023 may not be reflective of potential capacity of sites operating in west London (in most cases inputs in any particular year will be lower than actual site capacity).

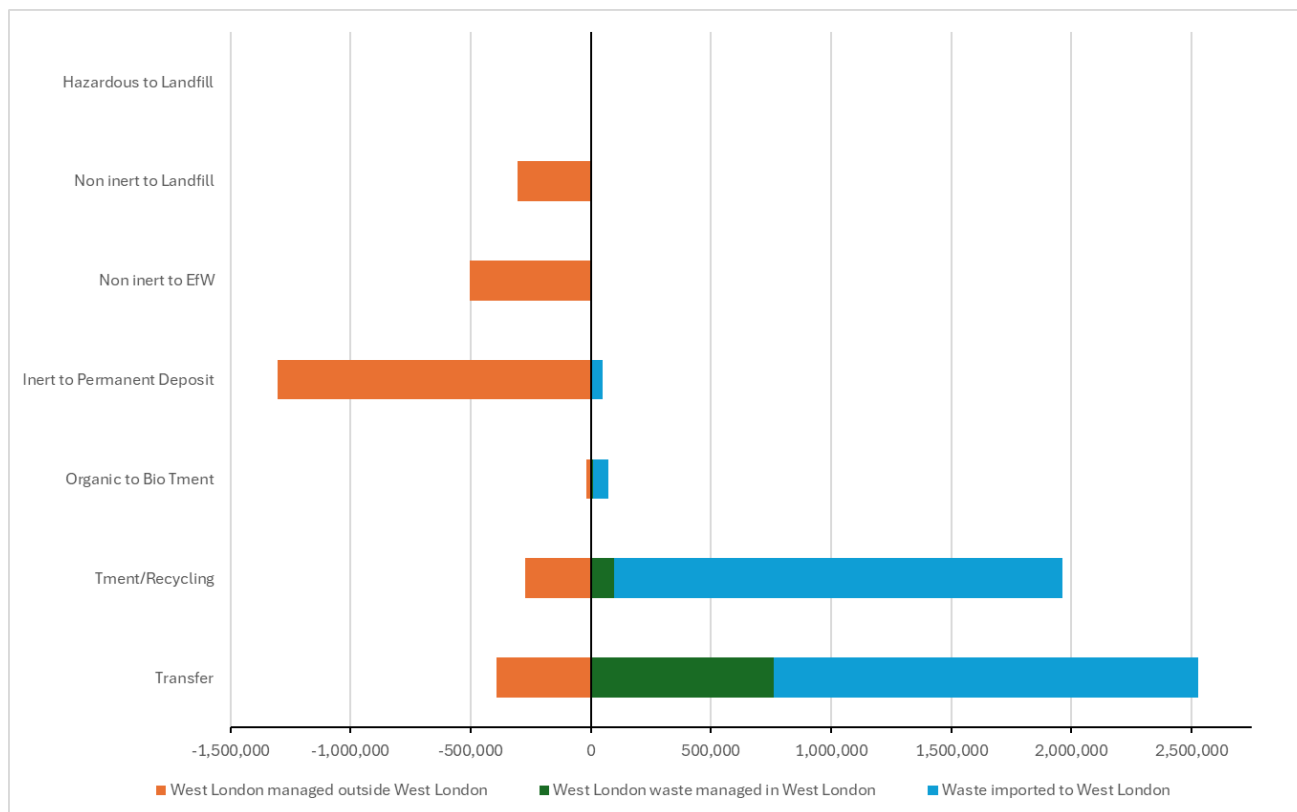


Figure 5 Waste import and export balance in West London 2023 by management method and waste type where known (tonnes)

The Proximity Principle

5.21 The disposal and the recovery of mixed municipal waste collected from private households in particular is also subject to the proximity principle²⁷. This seeks to ensure that mixed municipal waste be disposed of, or recovered, in one of the nearest appropriate installations. This is to be by means of the most appropriate methods and technologies, in order to ensure a high level of protection for the environment and public health.

5.22 This is intended to result in the establishment of an integrated and adequate network of installations for the disposal and recovery of mixed municipal waste collected from private households across the country. The requirement also extends to where the collection includes similar types of waste collected from non-household sources (e.g. waste from offices and retail premises).

²⁷ As set out in the retained EU Waste Framework Directive transposed in English law through *The Waste (England and Wales) Regulations 2011* as amended.

5.23 This principle is to be applied when decisions are taken on the location of facilities for the management of mixed municipal waste collected from private households and similar waste (see above) for disposal or recovery. This is reflected in NPPW that expects waste planning authorities to:

"...plan for the disposal of waste and the recovery of mixed municipal waste in line with the proximity principle, recognising that new facilities will need to serve catchment areas large enough to secure the economic viability of the plant;".

Recent case law has confirmed that a flexible approach to the application of the principle ought to be taken, and it shouldn't be applied slavishly²⁸.

5.24 NPPW requires local planning authorities with responsibility as Waste Planning Authority for their area, to include policies in their development plans which set out an overall strategy for the pattern and scale of future waste development, ensuring sufficient provision is made for infrastructure for waste management, and energy that may be produced (including heat).

Waste Movements

5.25 Data shows that waste is routinely transported between West London and other Waste Planning Authority (WPA) areas both within London and without. This cross-boundary movement is typical of the way in which waste is managed in general, as it has little regard for administrative boundaries. Flows of waste from west London which may be strategic to the management of waste over the Plan period have been identified²⁹. Host WPAs have been contacted to confirm that such flows may continue over the Plan period, and the outcome of this engagement has been taken into account in the Plan preparation process.

²⁸ In *Stop Portland Waste Incinerator v SHCLG*, the Court of Appeal held that the Secretary of State had met her duty to give reasons for granting permission for an energy recovery facility. The court confirmed that the 'proximity principle' in the joint local waste development plan is a matter of planning judgment to be applied with realism, not a strict rule favouring the nearest or allocated site. (April 2025 Case No: AC-2024-LON-003475)

²⁹ See WLWP, *Identification of Strategically Significant Waste Flows*, BPP Consulting, Updated July 2026.

Regional Policy – The London Plan

5.26 The administrative geography of London is overseen at a regional level by the Greater London Authority (GLA) which produces amongst other policy documents, The London Plan and the London Environment Strategy (LES). The London Plan provides strategic planning policy for the whole of London and how certain matters, including waste, should be addressed by Local Planning Authorities in preparing their Development Plan documents.

Apportionments

5.27 The London Plan states that London should manage as much of its waste within its boundaries as practicable, aiming to achieve net self-sufficiency by 2026 in all waste streams except for excavation waste³⁰. To meet this aim, the London Plan 2021 forecasts arisings of Local Authority Collected Waste (referred to as household waste) together with Commercial and Industrial waste (C&I waste) for London as a whole through to 2041, then splits the total down to Borough level. These forecasts are used as a basis to apportion quantities of this Household, Industrial and Commercial Waste (HIC) waste for management to each Borough so that the overall goal of managing the equivalent of 100 per cent of London's HIC waste within London (i.e. net self-sufficiency) by 2026 (Policy SI 8) is achieved. The quantities arrived at are referred to as the London Plan apportionments ('LP apportionments' for short).

5.28 The Borough level LP apportionments were generated by the GLA through a process that included assessment of existing capacity in each Borough along with a number of other factors considered to influence the ability of a particular Borough to provide requisite HIC waste management capacity. The types of capacity considered to count towards the management of apportioned waste (hereinafter referred to as 'qualifying capacity') is defined in Paragraph 9.8.4 of the London Plan as follows:

- energy recovery in London;
- production of solid recovered fuel (SRF) and refuse derived fuel (RDF) in London;
- sorting or bulking for re-use or recycling including anaerobic digestion. The reuse or recycling may take place within or outside London providing the capacity is located within London; and
- reuse or recycling including anaerobic digestion within London.

³⁰ Excavation waste is excluded from the London Plan net self-sufficiency target as it is more difficult for London to provide sites for its management or beneficial use due to the land area occupied by such management facilities. The London Plan also states that *"In line with circular economy principles, the management of excavation waste should be focused on-site or within local projects."* (para 9.7.9)

5.29 London Plan arisings and forecasts for the west London Boroughs are set out below in Table 1 below. The Old Oak & Park Royal Development Corporation (OPDC) does not have a separate waste apportionment through the London Plan 2021, and therefore waste management within its jurisdiction that falls within the WLWP area is accounted for by the apportionment assigned to the London Boroughs of Brent and Ealing.

Table 1: London Plan Forecast HIC Waste Arisings & Apportionments for the West London Boroughs

Borough	Forecast HIC Waste Arising		LP Apportionments	
	2021	2041	2021	2041
LB Brent	259,000	274,000	412,000	437,000
LB Ealing	291,000	306,000	542,000	576,000
LB Harrow	188,000	205,000	160,000	170,000
LB Hillingdon	347,000	365,000	423,000	449,000
LB Hounslow	260,000	275,000	407,000	432,000
LB Richmond	179,000	190,000	148,000	157,000
Total	1,524,000	1,615,000	2,092,000	2,221,000

5.30 Table 1 shows the HIC waste apportionments for west London are significantly higher than the GLA's projected arisings for HIC waste from west London as a whole. Hence west London is expected to make a substantial contribution towards London meeting the London Plan 2026 net self-sufficiency target beyond its own target of achieving net self-sufficiency at Plan area level.

5.31 The London Plan also sets out management targets for waste generated in London in Policy SI 7 Reducing waste and supporting the circular economy. These targets reflect those in the London Environment Strategy (LES) as follows:

- zero biodegradable or recyclable waste to landfill by 2026
- meet or exceed the municipal waste recycling target of 65 per cent by 2030
- meet or exceed the targets for each of the following waste and material streams:
 - construction and demolition – 95 per cent reuse/recycling/recovery
 - excavation – 95 per cent beneficial use (with 100% inert put to use)

5.32 In addition, in connection with hazardous waste management capacity, paragraph 9.8.18 of the London Plan identifies "*..a need to continue to identify hazardous waste capacity for London ...in co-operation with other Plan areas.*"

The London Plan expects boroughs to allocate sufficient land and identify waste management facilities to provide capacity in their plans to manage the tonnages of HIC waste apportioned as a minimum and for those waste streams not apportioned by the London Plan but subject to the management targets set out in London Plan policy.

Circular Economy

5.33 The London Plan includes a requirement for 'referable applications'³¹ to be submitted with a 'Circular Economy Statement' that demonstrates how the development will come forward in a manner which is consistent with achieving a circular economy. This includes how much waste the proposed development is expected to generate and where it will be managed. The GLA has published further guidance on the content of Circular Economy Statements.

Planned Provision

5.34 The London Plan expects boroughs to “...allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste”. This is in line with the NPPW which requires waste planning authorities to “...identify sites and/or areas for new or enhanced waste management facilities”. The London Plan identifies existing waste management sites, Strategic Industrial Locations, Locally Significant Industrial Sites and safeguarded wharves as suitable locations for new waste management facilities.

Safeguarding

5.35 The London Plan seeks to safeguard all existing waste sites so they are retained in waste use. The London Plan defines 'existing waste sites' as those with planning permission for waste use or those subject to an Environment Agency environmental permit for waste management.

5.36 In the event that an existing waste site is subject to an application for development for a non waste use, the London Plan requires compensatory capacity to be provided unless the capacity is demonstrated to not be required to meet London's needs as a whole. Compensatory capacity must be at or above the same level of the waste hierarchy of that which is lost. In the case of any loss of hazardous waste treatment capacity it must be replaced with similar. Existing waste sites may only be released without compensatory capacity being provided if it can be demonstrated that there is sufficient capacity elsewhere in London and the target of achieving net self-sufficiency is not compromised. This is to be achieved through a plan led approach.

5.37 The London Plan supporting text indicates that boroughs considering release of sites from safeguarding protection should share the capacity of these sites with other London boroughs facing a capacity shortfall (Para 9.8.6). The London Plan also acknowledges that it may not always be possible for boroughs to meet their apportionment within their boundaries and in these circumstances the ‘*transfer of apportioned waste*’ may be agreed upon

³¹ Referable applications are set out at <https://www.london.gov.uk/programmes-strategies/planning/planning-applications-and-decisions/referral-process-lpas>

between donor and receiving boroughs. This may be achieved through specific commitments included in the host authority's local (waste) plan, joint evidence papers or via bilateral agreements such as Statements of Common Ground (Para 9.8.7).

Housing design

- 5.38 Furthermore, the London Plan includes policy (Part G of Policy D4 Housing quality and standards) that requires housing to be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) food waste as well as residual waste.

Local Policy – Adopted Local Plans

- 5.39 Each of the local planning authorities party to the adopted and Proposed Submission WLWP have prepared Local Plans that set out their local land-use planning objectives and policies for their respective areas. These may include requirements of relevance to the formulation of the updated WLWP and have been taken into account.

6 Future requirements for waste management capacity

- 6.1 In order to establish how much waste management capacity may need to be provided in west London over the Plan period, an assessment of existing permitted waste management capacity available within west London has been undertaken³². The key findings of the study are set out below:

Management Capacity for Apportioned Waste

- 6.2 It is estimated that there is currently around 2.53 M tpa of permitted capacity in west London that would qualify as being suitable under the London Plan definition for managing the HIC waste apportioned to the west London boroughs. This is more than sufficient to manage the tonnage of HIC waste arisings of 2.2 million tonnes in 2041 apportioned by the London Plan 2021. A sensitivity analysis was undertaken to account for the possible loss of capacity at the six sites to be released³³ and this shows that even with this loss, a capacity shortfall is not predicted to materialise over the Plan period.

Management Capacity for C, D & E Waste

- 6.3 Based on an extrapolation of the baseline value for C & D waste arisings from west London in 2023 of 1.13 million tonnes, it has been estimated up to 1.34 million tonnes might arise in 2041. Comparing this to an estimate of existing C & D waste management capacity of c2.2 million tonnes reveals an estimated capacity surplus of approximately 0.85 million tonnes p.a. Unlike C&D waste, the management of excavation waste is not subject to the objective of net self sufficiency for London, and therefore the sufficiency of available management capacity has been separately assessed.

Management Capacity for Hazardous Waste

- 6.4 It has been estimated that 90,000 tonnes of hazardous waste was produced in west London in 2023. This is predicted to be a significantly lower tonnage in 2041 (50,900 tonnes)³⁴. Comparing this to an estimate of existing management capacity of c115,653 tonnes reveals a surplus in capacity over the Plan period even after the proposed release of selected existing waste sites at which hazardous waste may be managed. There is no policy expectation that 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.

³² Proposed Submission WLWP, *Assessment of Existing Waste Management Capacity*, BPP Consulting, Updated July 2026

³³ Proposed Submission WLWP, *Assessment of Existing Waste Sites for Release*, BPP Consulting, Updated July 2026

³⁴ Proposed Submission WLWP, *Hazardous Waste Arising in West London to 2041*, BPP Consulting, Updated July 2026

- 6.5 This study therefore confirms that no shortfalls in waste management capacity over the Plan period are predicted that warrant inclusion of specific land allocations in the Proposed Submission WLWP.

Non Inert Landfill Capacity

- 6.6 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 consented non-inert landfill capacity to receive residual waste forecast to arise in west London over the Plan period.
- 6.7 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."
- 6.8 According to the Environment Agency dataset for remaining landfill void in 2023³⁵ there are no operational non-inert landfill sites in west London. Therefore, all non-hazardous waste residues requiring landfill produced within west London would continue to be disposed at such sites outside the Plan area for the duration of the Plan period. Table 2 below shows the estimated non-hazardous landfill requirement based on an estimate of C&D waste processing residues and an element of London Plan forecast of HiC waste arisings in west London.

³⁵ <https://www.data.gov.uk/dataset/237825cb-dc10-4c53-8446-1bcd35614c12/remaining-landfill-capacity1>

- 6.9 Table 2 shows the requirement predicted to arise over the Plan period. It has been assumed that this will start at 2% of the London Plan HIC waste forecast (as shown in Table 1) falling progressively to 1% by 2041. Plus, forecast arisings of C, D & E waste processing residues held constant from actual values C, D & E waste forecast report³⁶).

Table 2: 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 15 WLWP CDEW Forecasts	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	

- 6.10 This data is derived from the WLWP CDEW Forecasts report plus an assessment of diversion potential for forecast HIC waste based on high levels already being achieved for LACW. Given the absence of non-inert landfill capacity currently, all non-hazardous residues produced within west

³⁶ Proposed Submission WLWP *Construction, Demolition & Excavation Waste Arising in West London to 2041* BPP Consulting (Updated July 2026).

London requiring landfill is managed beyond west London. Table 2 shows a declining annual requirement of c32,500 tonnes in 2025 reducing to c18,000 tonnes in 2041. It also shows the predicted cumulative non-inert landfill requirement of c428,500 tonnes by the end of the Plan period. An initial assessment of non-hazardous landfill capacity availability in proximity to west London is included in Appendix 1. The continued availability of capacity has been confirmed through engagement with WPAs hosting key landfill sites.

Inert Waste Management

- 6.11 The London Plan sets a target for all inert excavation waste to being 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 the mineral extraction sites 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 c1.6Mtpa of management capacity. This compares with estimated forecast arisings of between c.2.2Mt in 20026 and c.2.25Mt in 2041. 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 WLWP 5 in the updated WLWP provides for the possibility of further permanent deposit to land sites coming forward over the Plan period.

Providing for Waste From Beyond the Plan Area

- 6.12 When planning for waste, the NPPW expects WPAs to assess whether the unmet needs of other WPA areas could be met within their area. In light of the intended release of sites and identified surplus in capacity for the management of waste the West London LPAs are engaging with other London Boroughs who have responded to the Regulation 18 consultation to refine possible capacity sharing requests.

Appendix 1: Non Hazardous Landfill Capacity Assessment

The purpose of this note is to consider how residual waste arising in west London identified as requiring management at non hazardous waste landfill might be provided for over the Plan period (to 2041).

Defining Residual Waste Requiring Non Hazardous Waste Landfill

While residual waste is defined in *The Environmental Targets (Residual Waste) (England) Regulations 2023* for the purpose of monitoring the national residual waste reduction target, this definition only identifies it by the particular fates it goes to i.e. it is either sent to landfill, put through incineration or used in energy recovery, and so is not actually characterised as such, other than by excluding major mineral wastes which are largely inert waste categories from construction, demolition, excavation and mining activities.

For the purposes of this exercise residual waste requiring non hazardous waste landfill is taken to be composed of materials that are either:

- Not suitable for combustion, being of low calorific value, such as trommel fines which are residues of the sorting of skip waste; which must meet the loss on ignition test to be landfilled as inactive waste under the Landfill Tax regime; or
- is difficult to recycle or reduce, such as fibreglass bathroom suites and other bulky items (not containing PoPs which must now be destroyed through incineration);

so disposal to non-hazardous waste landfill is still considered to be the only viable management option in the short to medium term.

Projected Non Hazardous Waste Landfill Requirement for Waste Arising in West London

As set out in Table 3 the total projected non hazardous waste landfill requirement for west London over the Plan period is estimated to be c430,000 tonnes i.e c0.43Mt.

Non Hazardous Waste Landfill Capacity Beyond West London

The projected requirement for non hazardous waste landfill identified in the WLWP evidence report has been compared with the availability of void at non hazardous landfills located within former planning regions adjoining west London. The remaining void in these areas has been derived from a review of the Environment Agency dataset for remaining landfill void at the end of 2023 as set out in Table 3 below.

Table 3: Remaining Void At Non Hazardous Landfills Located Within Former Planning Regions Adjoining West London³⁷

Former Planning Region	WPA	Site Name	End Dates	Void m3 (end of 2023)
East of England	Central Beds Cambridgeshire	Elstow South (Stewartby)	2040	2,500,000
		Thalia Waste Management Park	2035	1,597,401
	Essex	Witcham Meadlands Landfill	2027	190,000
		Bellhouse Landfill Site	2026	1,312,968
		Elsenham Landfill	2029	814,141
		SRC Martells Quarry	2041	1,327,973
	Norfolk	Feltwell Landfill Site	2042	1,204,035
	Suffolk	Folly Farm Landfill (active mineral working)	2045	547,270
		Masons Landfill	2030	2,334,739
	Thurrock	Ockendon Area II & III Landfill	2042	3,288,928
South East	Buckinghamshire	Calvert Landfill Site	Unknown	6,593,996
		Land at Meadhams Farm Brickworks (active mineral working)	2040	215,420
		Springfield Farm Landfill (active mineral working)	2044	8,384,985
	Hampshire	Blue Haze Landfill	2029	362,395
	Kent	Shelford Landfill Site	2037	852,931
	Milton Keynes	Bletchley Landfill Site	2036	5,682,929
	Oxfordshire	Sutton Courtenay	2030	1,774,966
	Surrey	Redhill Landfill (North East Quadrant)	2030	2,242,522
Grand Total				41,227,599

The above Table shows that at the end of 2023 there was c41Mm3 of void (which equates to c35 million tonnes of non-hazardous waste after 15% inert waste for restoration is discounted) available within Waste Planning Authorities areas located in the former planning regions adjacent to west London. While some current site end dates would limit the availability of capacity for the full Plan period, given the low and predicted reducing need for non-hazardous landfill for residual waste from west London as set out in Table 2 above, it is considered that there is sufficient non-hazardous landfill capacity in proximity to west London for future needs to be met through to 2042.

The landfill sites located in the WPAs located in regions adjacent to west London offering the most substantial amount of capacity have been mapped in Figure 6.

³⁷ "Unknown" entry denotes where a response to a request for end dates was not received from the relevant host WPA.

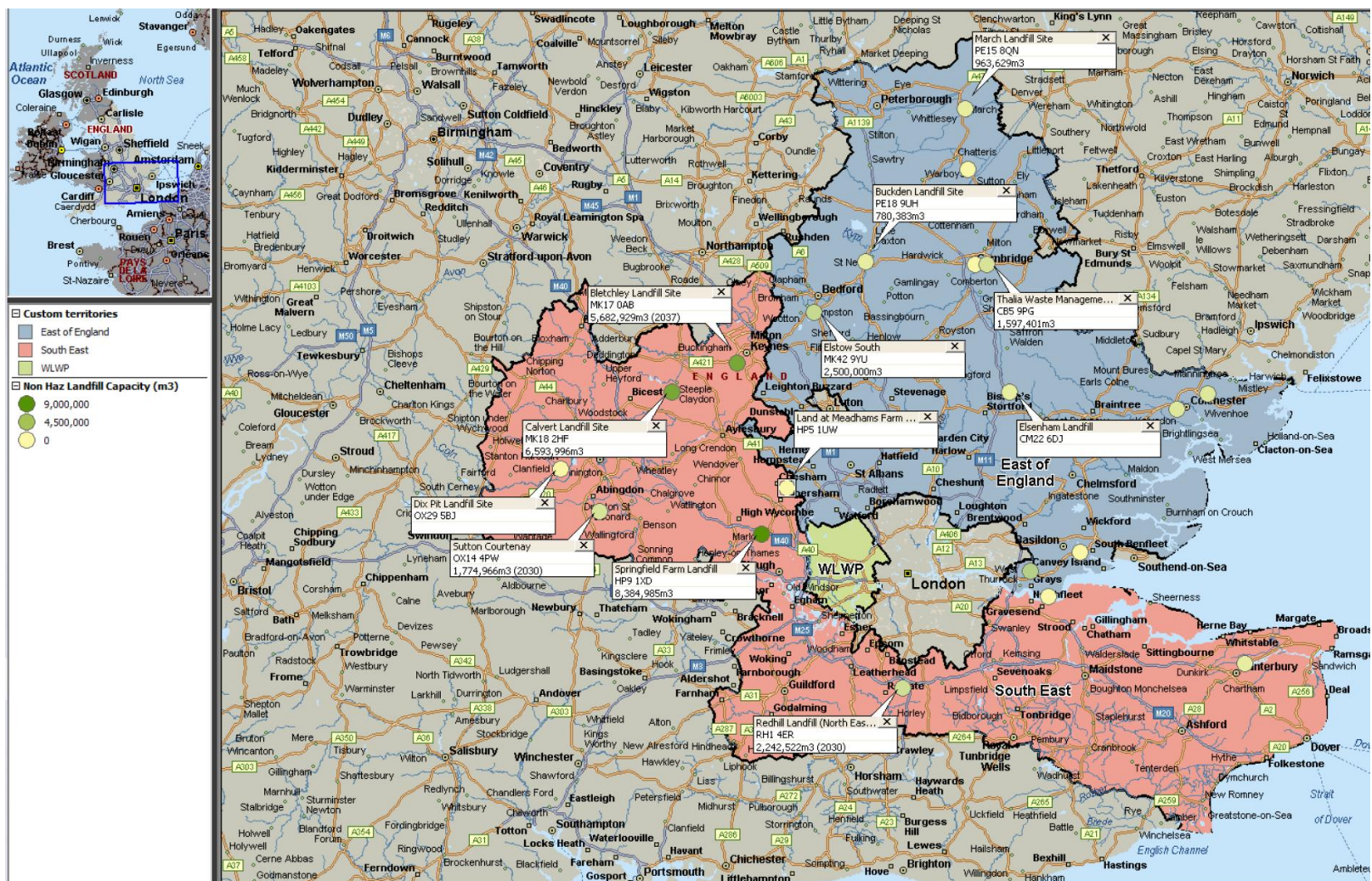


Figure 6 Non hazardous landfill sites in proximity to West London with remaining capacity (tonnes)

