



## Updated West London Waste Plan

### Strategically Significant Waste Flows

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## Glossary of Terms

<b>Anaerobic Digestion</b>	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.
<b>Composting</b>	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.
<b>Energy from Waste</b>	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.
<b>Environment Agency</b>	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.
<b>Hazardous Waste</b>	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.
<b>Incineration</b>	The controlled combustion of waste. Energy may also be recovered in the form of heat (see Energy from Waste).
<b>Landfill (including land raising)</b>	The permanent disposal of waste to land, by the filling of voids or similar features, or the construction of landforms above ground level (land-raising).
<b>Materials Recycling Facility (MRF)</b>	A facility for sorting recyclable materials from the incoming waste stream.
<b>Non-Hazardous Waste Landfill</b>	A landfill permitted to accept non-inert (biodegradable) wastes e.g. municipal and commercial and industrial waste and other non-hazardous (including inert) wastes. May accept certain hazardous waste if a special cell is constructed.
<b>Recovery</b>	Subjecting waste to processes that recover value including recycling, composting or thermal treatment to recover energy.
<b>Recycling</b>	The reprocessing of materials extracted from the waste stream either into the same product or a different one.
<b>Refuse Derived Fuel</b>	A fuel produced from combustible components extracted from municipal solid waste but can also include commercial and industrial waste too.
<b>The Plan area</b>	The area subject to the Waste Local Plan to which this study relates. In this case the boroughs that make up west London (Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond Upon Thames).
<b>Waste Planning Authority</b>	The authority responsible for planning for waste within a specific administrative area. In this case the LPAs that make up west London (Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond Upon Thames plus the Brent and Ealing parts of the Old Oak and Park Royal Development Corporation (OPDC) area).

## 1. Introduction

- 1.1 This report presents the outcome of an assessment of the movements of waste (a.k.a. waste flows) from west London to other Waste Planning Authority (WPA) areas to determine which movements may be regarded as strategic (or strategic in future). Establishing strategic movements is a necessary step in determining whether the emerging Updated West London Waste Plan (WLWP) can rely on such movements over the plan period or whether it needs to specifically include provision for additional capacity to address potential shortfalls. Where strategic movements are identified, the relevant WPAs will be contacted to establish whether ongoing movements into their area can be relied upon for the Plan period.
- 1.2 Engagement with WPAs involves consideration of the following:
- whether historical flows of waste identified in this report are likely to continue;
  - barriers to the continuation of waste exports due to, for example, exhaustion of finite capacity at landfill facilities and cessation due to time limited availability;
  - whether new flows of waste beyond the Plan area are likely to take place. This takes the above factors into account as well as any changes in capacity that the management of waste arising in west London currently relies on (situated either within or beyond west London).
- 1.3 Advice is provided to support the West London local planning authorities as WPAs for west London in their engagement activities by recommending which WPAs should be contacted about which waste movements.
- 1.4 This report forms part of the evidence base for the emerging Updated West London Waste Plan.

## 2. Waste as a Strategic Issue

- 2.1 The management of waste has little regard for administrative boundaries, with waste arising in one WPA area often being managed in another. Furthermore, waste management facilities may have catchments that extend beyond the boundary of the Plan area within which it is situated. Such flows are recognised in relation to the disposal of waste and recovery of mixed municipal waste in particular in the National Planning Policy for Waste that expects waste planning authorities to: *"...plan for the disposal of waste and the recovery of mixed municipal waste in line with the proximity principle, recognising that new facilities will need to serve catchment areas large enough to secure the economic viability of the plant;"*.
- Hence the management of waste can be a cross boundary strategic matter, the planning for which may require co-operation between WPAs.

### The Duty to Cooperate

- 2.2 Section 33A of the *Planning and Compulsory Purchase Act 2004* requires Councils in England that produce development plan documents to cooperate with local planning authorities, county councils and bodies or other persons as prescribed. The Duty to Cooperate imposes, in particular, a duty to: *"engage constructively, actively and on an ongoing basis"*. This is required in relation to "maximising the effectiveness" of, and having *"regard to"*, activities concerned with supporting or preparing planning policies *"so far as relating to a strategic matter"*. As such the Duty places a legal duty on plan making Councils to engage *"constructively, actively and on an on-going basis"* in *"maximising the effectiveness"* of Local Plans.
- 2.3 As noted above, the Duty applies to the preparation of development plan documents, in so far as they relate to a *"strategic matter"*. A strategic matter is defined as *"sustainable development or use of land that has or would have a significant impact on at least two planning areas including... in connection with infrastructure that is strategic..."* (S33A(4)). Waste management qualifies as a strategic matter for the purposes of the Duty.
- 2.4 The updated National Planning Policy Framework (December 2024) expects that Local Plans include 'non-strategic' and 'strategic' policies, and that strategic policies: *"...set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:.....infrastructure"* and this includes *"for.....waste management"*. It goes on to specify that:

*"In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these."*

2.5 The *Levelling up and Regeneration Act 2023* includes provisions for the revocation of the Duty to Cooperate. However, at the time of writing the regulations and guidance that would enact these provisions have still to be published and until such time, the Duty remains a requirement in Plan making that is intended to seek alignment between Plan making bodies and other Plan making and statutory bodies. It is anticipated that whatever replacement mechanism is put in place, an assessment of strategic flows of waste will still need to be undertaken for plan making purposes.

### **Net Self Sufficiency**

2.6 Net self sufficiency is an approach applied in waste planning to establish how much capacity should be planned for in each waste Plan area. This follows the polluter pays principle whereby the area that produces the pollution (in this case waste) should be responsible for managing it. The self sufficiency requirement is subject to the 'net' caveat as waste does not recognise administrative boundaries and so there is no expectation that every tonne of waste produced in a particular Plan area ought to be managed within that Plan area, rather that, overall, there should be a balance of provision. The objective of net self sufficiency is therefore to ensure that there is sufficient capacity to manage the tonnage of waste equivalent to that predicted to arise within a Plan area.

2.7 In the case of West London, The London Plan 2021 sets out the expectation for London as a whole to achieve net self sufficiency by 2026 (Policy SI 8 A 1) and to continue to be so for the Plan period. The apportionments that apply to household, commercial and industrial (HCI) waste produced in London is intended to ensure this objective is achieved at Borough level. Hence while achievement and maintenance of net self sufficiency may not be a stated objective of the emerging WLWP it can be inferred for HCI waste as a minimum.

2.8 The degree to which a Plan area is net self sufficient is established by comparing the available capacity within the Plan area with the projected capacity requirements, to ascertain if there is any gap. The management of any waste by disposal, and the

recovery of mixed municipal waste is subject to the proximity principle<sup>1</sup> which means that it should be managed at one of the nearest appropriate facilities. Such a facility may be located outside a Plan area.

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<sup>1</sup> See National Planning Policy for Waste (October 2014)

## Identifying Waste Flows that might be strategic

2.9 A key matter to address when assessing the robustness of the emerging Plan strategy is to establish whether key historical patterns of management of waste outside of the Plan area can be relied upon for the duration of the Plan period. To demonstrate compliance with the Duty to Cooperate, the focus for engagement in this case is therefore to address outgoing waste flows, which may be regarded as 'strategic' in nature. It is recognised that responding to enquiries relating to waste flows places a burden on respondent WPAs. In order to focus effort, target WPAs have been screened applying the following criteria to focus on flows that are strategic to West London.

### **Step 1. Does the flow to the WPA area exceed the initial significance screening thresholds?**

2.10 The guideline values provided in the National Waste TAB Chairs 'Duty to Cooperate on Waste – Practice Guide for Waste Planning Authorities in England' were used as follows:

- Non-hazardous waste: 5,000 tonnes per annum
- Inert waste: 10,000 tonnes per annum
- Hazardous waste: 100 tonnes per annum

### **Step 2. Does the specific flow represent a significant proportion of total arisings of the particular waste type produced in the Plan area?**

2.11 It is considered that where flows both exceed the screening thresholds and also represented an amount greater than 20% (i.e. a fifth) of the total quantity of that particular waste type produced in the Plan area it may be considered to be strategic and hence this value was used as a further screening threshold.

### **Step 3: Does the specific flow go to a single site or multiple sites?**

2.12 Where waste went to a single or small number of sites within a particular Plan area, the dependency is greater than if it was managed across a large number of sites. This suggests that flows to such sites would be of strategic importance to a Plan strategy. Conversely where inputs to individual sites fell below the screening threshold they have been excluded from further analysis.

- 2.13 The following section assesses the flows of waste that might be considered strategic in nature from West London to other Plan areas.
- 2.14 It should be noted that only flows to WPAs located in England have been considered, as the principal data source used, the Environment Agency (EA) Waste Data Interrogator (WDI), only reports on inputs to site located in England subject to EA environmental permits. Hence possible flows to sites located in Scotland and Wales and further afield are not accounted for in this exercise. Having said that, the geographical location of West London and spread of flows to facilities in England indicated by this report suggests it is highly unlikely that additional strategic flows between West London and Wales and/or Scotland exist.

### 3. Assessing Waste Flows from West London

#### Net Self Sufficiency Balance

3.1 Table 1 below shows the tonnages of waste attributed to West London in the WDI 2023 managed at permitted facilities within West London and beyond, as well as the tonnage of waste from outside of West London managed at permitted facilities located within West London in 2023.

**Table 1: Tonnages of West London waste managed in permitted facilities within West London and outside West London, and tonnage of waste imported to West London permitted facilities**

Source: WDI 2023

West London arisings		Managed in West London		
	West London waste managed outside West London	West London waste managed in West London	Waste imported to West London	Total Managed
	2,495,078 <sup>23</sup>	869,932	5,178,236	<b>6,048,168</b>
<b>Total West London waste managed</b>	<b>3,365,010</b>			

3.2 Table 1 shows that c0.87M tonnes of West London's waste were reported as being managed in West London in 2023. This compares with c2.5M tonnes of West London waste managed outside West London. This export is offset by the significant import of waste for management at West London permitted sites of c5.2M tonnes.

#### Outcome of Further Investigation

3.3 Firstly, the significant import of waste was interrogated further, and it was found that the WDI 2023 reported c1.4M tonnes of London uncodeable waste being deposited at three permanent deposit sites located in LB Hillingdon as shown in Table 2 below.

**Table 2: Inputs to HS2 sites located in LB Hillingdon**

Source: WDI 2023

Site Name	Inert Landfill	Non-Hazardous Landfill	Total
Eastern Mound Ruislip Northern Sustainable Placement S2	366,611		366,611

<sup>2</sup> All outputs (4,169t) of Brent Oil Contractors Ltd site located in Brent would be classified as waste arising in West London regardless of source. Given none of the site inputs were reported to have arisen in West London, site outputs have been deducted from this value.

<sup>3</sup> Movements to EfWs under contract to WLWA were missing in WDI data so this value was embellished with WLWA data. See Paragraph 3.6 below.

Ruislip Southern Sustainable Placement S2		753,082 <sup>4</sup>	753,082
Skanska Costain Strabag (SCS) Joint Venture	312,012		312,012
<b>Total</b>	<b>678,623</b>	<b>753,082</b>	<b>1,431,705</b>

3.4 Given these sites serve the HS2 project these facilities were in effect managing arisings onsite as part of the project. Therefore, the tonnages shown have been deducted from the waste imported value in Table 1 and has not been included in the West London arisings and the capacity has not been counted towards West London's provision. Hence the value for the import of waste for management from outside West London has been revised down to c3.7M tonnes. This gives a revised net self sufficiency value of c1.2Mt (2.5Mt export minus 3.7Mt import).

3.5 In addition to the above, a transfer station taking non-biodegradable waste located at Willesden Euro Terminal operated by Skanska Construction<sup>5</sup> used for HS2 related activities reported receiving c950,000 tonnes of primarily excavation waste in 2023. Whilst the tonnage managed has been disregarded in the assessment of arisings, the pre HS2 capacity of 600,000tpa has been counted in the capacity assessment. Hence the value for the import of waste for management from outside west London has been revised further down to c2.8M. This gives a revised net self sufficiency value of c0.3Mt (2.5Mt export minus 2.8Mt import).

3.6 Secondly, it was known that residual LACW was managed under contract between WLWA and Suez Recycling and Recovery UK Ltd. This involved export to the Severnside EfW plant in South Gloucestershire. However, the WDI 2023 does not report any inputs from West London in 2023<sup>6</sup>. Following direct enquiry of WLWA, c232,000 tonnes of waste was attributed to west London. WLWA's response to the enquiry also identified the Lakeside EfW plant in Slough as receiving c138,500 tonnes of LACW from west London. Whilst the WDI 2023 only reports c58,500 tonnes of west London waste being sent to this EfW plant<sup>7</sup>, the full tonnage as reported by WLWA has been used for the purposes of this flows mapping exercise<sup>8</sup>. Hence the tonnage of west London waste managed outside west London has

<sup>4</sup> This is waste classed as EWC 19 13 05 solidified wastes.

<sup>5</sup> A search of the EA public register in 2025 indicates this permit is now held by Strabag AG-UK Branch.

<sup>6</sup> It does report c76,500 tonnes under 'London (WPA Not Codeable)' going to the Severnside EfW facility as well as c221,500 tonnes under 'City of London' as source.

<sup>7</sup> A review of the inputs to the Lakeside EfW facility does show c48,500 tonnes of 'London (WPA Not Codeable)', however, this is not a direct match for the missing c80,000 tonnes.

<sup>8</sup> A total of c0.5M tonnes of West London waste was managed via EfW outside West London in 2023. This consists of the values provided by WLWA for LACW going to Severnside EfW and Lakeside EfW (c370,500 tonnes) plus c129,500 tonnes going to a number of other EfW plants as reported in the WDI 2023. Defra data for WLWA for 2022/23 shows 421,000 LACW sent to EfW, so the difference (c80,000) would be C&I waste.

increased to c2.8M tonnes. This gives a revised net self sufficiency balance of coMt (2.8Mt export minus 2.8Mt import).

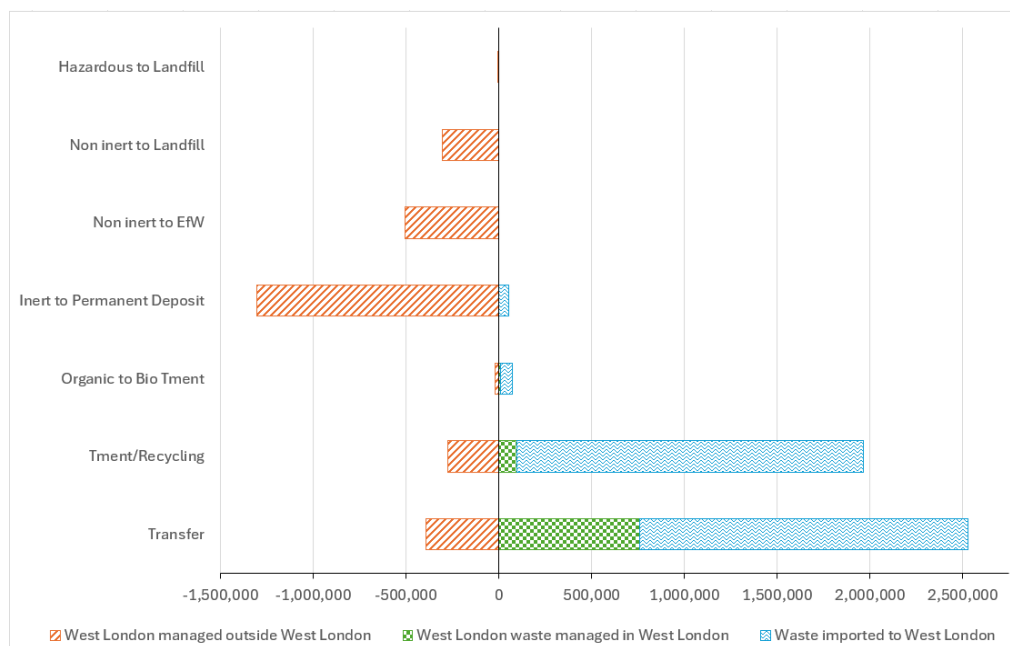
3.7 The revised values are shown in Table 3 below.

**Table 3: Adjusted Tonnages of West London waste managed in permitted facilities within West London and outside West London, and tonnage of imported waste to West London facilities**

Source: WDI 2023

West London arisings		Managed in West London		
	West London waste managed outside West London	West London waste managed in West London	Waste imported to West London	Total Managed in West London
	2,806,945	869,932	2,796,481	<b>3,666,413</b>
<b>Total West London waste managed</b>	<b>3,676,877</b>			

3.8 So, taking this snapshot as a simple balance, it can be said that in 2023 west London achieved net self sufficiency in management capacity, (2.8Mt imported vs 2.8Mt exported). Figure 1<sup>9</sup> displays the balance between imports and exports by waste management method and waste type.



**Figure 1: Waste import and export balance in West London 2023 by management method and waste type where known (tonnes)**

Figure 1 shows that:

- all non inert waste landfilled (c350,000t) was exported (in the absence of any Plan area landfill capacity).

<sup>9</sup> Note that Figure 1 only includes waste managed at permitted sites in England and does not include any waste exported to Wales, Scotland or further afield as this is not reported in the WDI.

- all non inert waste subject to EfW (c500,000t) was exported (in the absence of any Plan area EfW capacity).
- a significant tonnage of inert waste (c1.3Mt) was exported for permanent deposit.
- significantly more waste was imported to west London transfer and treatment sites than exported, showing west London makes a significant contribution to provision of management capacity for waste arising outside west London itself.

3.9 It should be noted that Figure 1 presents:

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

## Identifying Potentially Strategic Waste Flows

### Step 1: Applying the National Waste Movement Screening Guidelines

3.10 The waste movement guidelines referred to above have been applied as thresholds by waste category to screen out movements that would not be considered strategic to the West London Plan area. Table 4 shows movements of waste from west London in 2023 (latest data available) to other WPAs (in rank order) where one or more of the thresholds have been met or exceeded by waste category.

**Table 4: WPAs receiving Waste from West London in excess of Guideline Thresholds 2023**
*Source: WDI 2023*
*Highlighted entries are those where initial screening threshold values have been exceeded*

Receiving WPA	Non-inert	Inert <sup>10</sup>	Hazardous <sup>11</sup>
Cambridgeshire	123,865	501,681	<100
Hertfordshire	<5,000	225,848	13,503
South Gloucestershire	232,000 <sup>12</sup>	0	0
Peterborough	<5,000	202,060	0
Slough	190,697 <sup>13</sup>	<10,000	412
Surrey	18,298	154,679	1,862
Warwickshire	<5,000	172,271	154
Milton Keynes	121,076	43,503	0
Buckinghamshire	32,392	117,829	1,364
Windsor and Maidenhead	<5,000	132,690	0
Thurrock	78,499	<10,000	<100
LB Bexley	54,483	<10,000	<100
Essex	<5,000	49,245	179
Sheffield	<5,000	42,124	<100
LB Lewisham	42,095	<10,000	0
Oxfordshire	24,294	14,033	912
LB Greenwich	5,202	30,902	0
Kent	18,853	<10,000	4,099
LB Southwark	18,010	0	<100
LB Enfield	17,674	<10,000	0
LB Barnet	0	16,164	<100
Derbyshire	9,256	<10,000	<100
Rotherham	8,589	<10,000	<100
LB Sutton	7,420	0	0
Solihull	6,273	<10,000	0
Leicestershire	5,812	0	<100
Medway	<5,000	<10,000	903
Suffolk	<5,000	0	557
Wokingham	<5,000	<10,000	522
Sandwell	<5,000	0	421
Bedford	<5,000	0	249
Leeds	<5,000	0	239
Lancashire	<5,000	0	181
LB Newham	<5,000	<10,000	125

<sup>10</sup> This does not include the London (uncodeable) waste allocated to West London in the CDE waste report (nor that arising from HS2 discussed in paragraph 3.4.

<sup>11</sup> No outputs from Fourth Way WTF site operated by Brent Oil Contractors Ltd were sent to any of the listed WPAs.

<sup>12</sup> Value provided by WLWA as discussed in para 3.6.

<sup>13</sup> c111,000 attributed tonnage as reported in the WDI plus missing LACW value to Lakeside EFW provided by WLWA as discussed in para 3.6.

3.11 Table 4 shows that in 2023 a total of 34 WPA areas accepted quantities of waste from West London in excess of the strategic screening thresholds, with 11 accepting waste in quantities that exceeded at least two of the screening thresholds.

3.12 Analysis of data for 2021 and 2022 indicates a further 2 WPAs received waste in excess of the initial screening thresholds and 4 WPAs listed above received different waste types to those listed in Table 4. The WPAs are listed in Appendix 1 and the receiving sites in Appendix 2, 3 and 4.

#### **Step 2: Establishing if the Movements are of Strategic Significance.**

3.13 The movements from west London that exceed the guideline screening thresholds listed in Table 3 may only be considered to be strategic following further analysis as to the significance each movement may have for the overall management of the particular waste stream arising within the Plan area (in this case west London).

3.14 This is assessed primarily in terms of:

- The proportion of overall tonnage arising from the Plan area that the movement accounts for; and
- the availability of alternative capacity within the Plan area catchment (this is represented by the distance from west London equivalent to the furthest site waste of that type travels to (this varies depending on the waste type being considered)).

3.15 For the purpose of this exercise, a value of over 20% i.e. a fifth of the total arising of each waste type has been taken as a threshold of significance. The outputs of this exercise are displayed in Tables 5, 6 and 7 below. The total tonnages shown should not be taken as actual arisings as there will potentially be a degree of double counting in the values with the same waste being managed at a number of facilities before reaching its final fate.

**Table 5: Assessment of principal non-inert waste type arising in West London applying significance threshold of >20% by Destination WPA**

Source: WDI 2023

Highlighted entries are those that exceed 20% significance threshold

Waste Type	Total tonnes arising in West London	WPA	Total Tonnes Received	Proportion of total waste type arising managed
Mixed municipal waste	1,024,411 <sup>14</sup>	South Gloucs.	232,000	23%
		Slough	166,918 <sup>15</sup>	16%
		Lewisham	42,087	6%
		LB Bexley	32,800	5%
		LB Southwark	18,001	3%
		LB Enfield	17,634	3%
		Kent	14,062	2%
		Derbyshire	8,678	1%
		Leicestershire	5,550	1%
		Buckinghamshire	5,202	1%
		<b>Sub total</b>	<b>542,932</b>	<b>53%</b>
Process residues	348,470	Cambridgeshire	119,686	34%
		Milton Keynes	104,157	30%
		Thurrock	38,664	11%
		Oxfordshire	22,804	7%
		LB Bexley	21,457	6%
		Buckinghamshire	12,807	4%
		Surrey	12,092	3%
		<b>Sub total</b>	<b>331,666</b>	<b>95%</b>
Wood	67,084	Thurrock	39,782 <sup>16</sup>	59%
		Rotherham	8,540	13%
		Solihull	5,571	8%
		<b>Sub total</b>	<b>53,893</b>	<b>80%</b>
Biodegradable kitchen and canteen waste	54,438	Slough	20,431	38%
Fluff-light fraction and dust	13,035	Milton Keynes	13,035	100%
Clinical waste	11,406	Slough	9,080	80%

Table 5 shows the following:

- Non-inert waste travels significant distances for management from west London (as far as Derbyshire (c146 miles and c3 hour drivetime) and Leicestershire in some cases; and

<sup>14</sup> This value compares with the London Plan forecast value for HIC waste arisings from the WLWP Area of 1.52Mt.

<sup>15</sup> This value is made up of mixed municipal waste managed at Tanhouse Farm MRF (c28,500 tonnes) and Lakeside EfW (c26,500 tonnes) as reported in the WDI 2023. The remaining c112,000 tonnes is LACW as reported by WLWA assumed to be mixed municipal waste.

<sup>16</sup> Corresponds to combined output of 27,517t wood sent to Essex from three WTS.

- the three dominant flows were mixed municipal waste with totals for WPAs shown as c543,000 tonnes, process residues from west London's waste management facilities at c331,500 tonnes, and wood at c54,000 tonnes; and
- of the non-inert waste exported, 6 movements in 2023 exceeded the 20% significance threshold.

**Table 6: Assessment of principal inert waste type arising in West London applying significance threshold of >20% by Destination WPA**

Source: WDI 2023

*Highlighted entries are those that exceed 20%*

Waste Type	Total tonnes arising in West London	WPA	Total Tonnes Received	Proportion of total waste type arising managed
Soils and stones	1,625,879	Cambridgeshire	500,432 <sup>17</sup>	31%
		Hertfordshire	216,200	13%
		Peterborough	202,060 <sup>18</sup>	12%
		Warwickshire	172,232	11%
		Surrey	133,738	8%
		Windsor & Maidenhead	130,070	8%
		Buckinghamshire	92,842	6%
		Essex	49,151 <sup>19</sup>	3%
		Sheffield	42,124	3%
<b>Sub total</b>			<b>1,538,850</b>	<b>95%</b>
Mixed construction & demolition wastes	151,284	LB Greenwich	29,975	20%
		LB Barnet	15,486	10%
<b>Sub total</b>			<b>45,461</b>	<b>30%</b>
Concrete, bricks, tiles and ceramics	97,481	Milton Keynes	36,121	37%
		Surrey	14,322	15%
<b>Sub total</b>			<b>50,443</b>	<b>52%</b>
Concrete	39,380	Buckinghamshire	10,699	27%

Table 6 shows the following:

- transport of inert waste out of west London to other parts of London and the home counties and beyond is widespread; and
- the three dominant flows were soils & stones at c1.5 M tonnes, concrete, bricks, tiles and ceramics at c50,500 tonnes and mixed C,D & E waste at c45,500 tonnes; and,

<sup>17</sup> Corresponds to reported output of 496,255t from Willesden Euro Terminal (rail connected).

<sup>18</sup> Corresponds to reported output of 159,632t from Neasden Sidings (rail connected).

<sup>19</sup> Corresponds to reported output of 30,970t from Wembley Depot.

- of the inert waste exported, only 4 movements in 2023 exceeded the 20% significance threshold.

**Table 7: Assessment of principal hazardous waste types arising in West London applying significance threshold of >20% by Destination WPA**

Source: WDI 2023

Highlighted yellow entries are those that exceed 20%; amber entries exceed 20% but fall below 500t significance threshold

Waste Type	Total tonnes arising in West London	WPA	Total Tonnes Received	Proportion of total waste type arising managed
Grease & oil mixture from oil/water separation	8,292	Hertfordshire	8,292	100%
Oily water from oil/water separators	4,232	Hertfordshire	4,208	99%
WEEE	4,895	Kent	3,779	77%
		Lancashire	175	4%
		Oxfordshire	122	2%
Infectious clinical waste	3,466	Wokingham	509	15%
		Medway	342	10%
ELVs	3,456	Buckinghamshire	1,359	39%
Hazardous soil & stones	1,569	Surrey	1,234	79%
		Sandwell	256	16%
Wastes from grit chambers and oil/water separators	686	Hertfordshire	677	99%
Mineral-based non-chlorinated engine, gear and lubricating oils	1,239	Suffolk	557	45%
		Medway	464	37%
Asbestos	452	Sandwell	156	35%
		Surrey	156	34%
Bottom ash & slag	344	Surrey	344	100%
Contaminated packaging	269	Oxfordshire	183	68%
Liquid wastes containing dangerous substances	260	Hertfordshire	133	51%
Contaminated absorbents, filter materials, wiping cloths, protective clothing	258	Oxfordshire	146	57%
Other wastes	240	Leeds	238	99%
Premixed wastes	185	Kent	185	100%

Table 7 shows the following:

- The three dominant flows were: grease and oil at c8,500 tonnes; oily water from oil/water separators at c4,000 tonnes and WEEE at c4,000 tonnes; and
  - of the hazardous waste exported, 16 movements in 2023 exceeded the 20% significance threshold; and
  - if 500 tonnes is used as the threshold, the number of movements that exceed the 20% significance threshold (and the 500 tonne threshold) reduces to 7.
  - Given a number of WPAs (7) received more than 100 tonnes but less than 500 tonnes of hazardous waste from west London, it is considered that these are not as significant as the flows that exceed a 500-tonne threshold and account for 20% or

more of the total quantity produced. Therefore, the next step excludes sites that received less than 500 tonnes.

### Step 3: Identifying Specific Receiving Sites of Strategic Significance.

- 3.16 Detailed examination of the waste stream specific totals indicates that movements of waste from West London that *might* be classed as strategically significant i.e. met or exceeded the screening thresholds, were managed at the sites listed in the following tables. It is considered that where strategic flows went to a small number of sites the strategic dependency is greater than if it was managed across a large number of sites. This suggests that flows to such sites would be of greater strategic importance to the Plan strategy. Conversely where inputs to individual sites fell below the screening threshold they have been excluded from further analysis.
- 3.17 A detailed analysis by principal waste streams has been conducted using 2023 data.

#### West London Non-Inert Waste Destinations

- 3.18 Table 8 shows the destination sites for West London non-inert waste which received more than 5,000 tonnes in 2023 where the tonnage received exceeded the 20% significance threshold.

**Table 8: Destination sites for West London Non-Inert Waste exports > 5,000t and >20% by WPA in rank order by tonnes**

Source: WDI 2023

WPA	Site Category	Site Name	Site Operator	Waste Type	Tonnage
South Gloucestershire	Incineration	Sevenside EfW	Suez Recycling and Recovery UK Ltd	Residual LACW	232,000
Cambridgeshire	Landfill	Buckden North Landfill	Anti-Waste Ltd	Process residues	119,686
Slough	Incineration	Lakeside EfW	Lakeside Energy from Waste Ltd	Biodegradable kitchen & canteen waste plus clinical waste	26,462 <sup>20</sup>
Thurrock		Tilbury Green Power	Tilbury Green Power Ltd	Wood	35,305
Milton Keynes	Landfill	Bletchley Landfill Site	FCC Waste Services (UK) Ltd	Fluff-light fraction and dust	13,035

- 3.19 Table 8 shows the significant flows of non-inert waste from west London were managed at 5 facilities located in 5 WPAs.

<sup>20</sup> As shown in Table 5 mixed municipal value input falls below the 20% threshold so has not been taken forward.

### West London Inert Waste Destinations

3.20 Table 9 shows the destination sites for inert waste from west London that received more than 10,000 tonnes in 2023 where the tonnage received exceeded the 20% significance threshold.

**Table 9: Destination sites for West London Inert Waste exports >10,000t and >20% by WPA in rank order by tonnes**

*Source: WDI 2023*

WPA	Site Category	Site Name	Site Operator	Waste Type	Tonnage
Cambridgeshire	Landfill	Barrington Works Landfill	Cemex UK Cement Ltd	Soil and stones	500,432
Milton Keynes		Bletchley Landfill Site	FCC Waste Services (UK) Ltd	Concrete, bricks, tiles & ceramics	36,121
LB Greenwich	Treatment	Tunnel Wharf	H. Sivyer Transport Ltd	Mixed construction & demolition wastes	29,077
Buckinghamshire		Hollybush Lane Aggregate Recycling Facility	O'Malley Haulage Ltd	Concrete	10,699

3.21 Table 9 shows significant flows of inert waste from West London were managed at 4 facilities located in 4 WPAs.

### West London Hazardous Waste Destinations

3.22 Table 10 shows the destination sites for west London hazardous waste receiving more than 500 tonnes where the tonnage received exceeded the 20% significance threshold.

**Table 10: Destination sites for West London Hazardous Waste exports c500t or more in 2023 and >20% by WPA in rank order by tonnes**

*Source: WDI 2023*

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

3.23 Table 10 shows significant tonnages of hazardous waste from west London were managed at 7 sites located in 5 WPA areas.

## 4. Summary

4.1 A total of 14 sites were initially identified as receiving potentially strategically significant quantities of waste from West London in 2023. These were spread across a total of 11 WPA areas.

4.2 Further analysis suggests the WLWP area has strategically significant reliance on facilities located in the 11 WPA areas identified in Table 11 below.

**Table 11: WPA areas to which strategically significant tonnages of West London waste flowed in 2023 by principal waste type (in alphabetical order)**

WPA	Non-inert	Inert	Hazardous
Buckinghamshire	-	10,699	1,359
Cambridgeshire	-	500,432	-
Greenwich	-	29,077	-
Hertfordshire	-	-	13,499
Kent	-	-	3,829
Milton Keynes	13,035 <sup>21</sup>	36,121	-
Slough	26,432 <sup>22</sup>	-	-
South Gloucestershire	232,000	-	-
Suffolk	-	-	557
Surrey	-	-	1,806
Thurrock	35,305	-	-

4.3 These strategically significant flows have been mapped in Figure 2 & 3 below.

<sup>21</sup> Landfill input of fluff light fraction and dust (derived from MRS processing of ELVs etc).

<sup>22</sup> Given the substantial tonnage of LACW managed at the Lakeside EfW plant it is recommended that the enquiry covers the continued availability of capacity for mixed municipal waste at that plant even though it falls below the 20% threshold.

**Figure 2: Significant Waste Flows from West London in 2023 by receiving WPA and principal waste type - London & wider South East (tonnes)**



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## 5. Recommendation

5.1 It is recommended that the 11 WPAs hosting facilities identified as having received waste movements from west London in quantities that may be regarded as strategic be contacted to confirm the following:

- Whether the facilities identified as receiving waste are still operational given the dataset is for 2023.
- Any planning reasons that might mean the acceptance of wastes from west London cannot continue, such as consent conditions and end dates; or if the site has been earmarked in local plans for redevelopment. In addition, where no planning reason is given confirmation that the site is safeguarded for the management of that type of waste should be sought.
- Whether the host WPA has any specific policies in its local plan concerning providing for the management of waste that arises outside their respective Plan area.
- Whether any Statements of Common Ground have been entered into, or whether there has been correspondence, with other source WPAs concerning continued availability of capacity at the facility in question, that might compromise continued access for west London's waste.

5.2 Furthermore, it is recommended that all WPAs receiving waste from west London in quantities which exceeded the initial screening thresholds be contacted to make them aware of the work on the emerging Updated WLWP. This will provide an opportunity for WPAs to set out their position on waste movements from west London.

5.3 The outcomes of the above engagement should be documented, and agreement sought with WPAs hosting facilities expected to take strategically significant quantities of waste for which ongoing access is to be relied upon during the Plan period as appropriate. While in most cases it is envisaged that agreement will be achieved via an exchange of correspondence, host WPAs will be invited to consider whether a Statement of Common Ground is necessary.

## Appendix 1: Destination WPAs of Hazardous, Non-inert and Inert Waste exports from West London applying initial screening thresholds 2021-2023

Highlighted cells: Green – WPAs receiving waste from West London above screening thresholds  
Blue - additional entries receiving waste from West London above screening thresholds in 2021 and/or 2022

Source: WDI 2021, 2022 & 2023

Facility WPA	Non-Inert			Inert			Hazardous		
	2021	2022	2023	2021	2022	2023	2021	2021	2023
Cambridgeshire	78,127	102,598	123,865	153,843	352,923	501,681	<500	<500	<500
Hertfordshire	14,960	0	<5,000	47,146	0	225,848	14,103	13,435	13,503
Peterborough	0	<5,000	<5,000	<10,000	0	202,060	<500	<500	0
Surrey	<5,000	5,021	18,298	113,705	149,496	154,679	2,977	1,005	1,862
Warwickshire	<5,000	<5,000	<5,000	0	<10,000	172,271	<500	<500	<500
Milton Keynes	106,999	108,153	121,076	74,068	58,618	43,503	0	0	0
Buckinghamshire	68,164	60,170	32,392	154,888	168,824	117,829	4,061	1,025	1,364
Windsor and Maidenhead	0	0	<5,000	305,235	444,312	132,690	0	<500	0
Slough	57,756	101,829	110,829	<10,000	<10,000	<10,000	<500	<500	<500
Thurrock	39,160	67,441	78,499	21,468	11,650	<10,000	<500	<500	<500
LB Bexley	42,498	40,511	54,483	0	0	<10,000	<500	<500	<500
Essex	<5,000	<5,000	<5,000	23,948	27,685	49,245	<500	<500	<500
Sheffield	<5,000	<5,000	<5,000	0	0	42,124	<500	<500	<500
LB Lewisham	40,832	44,521	42,095	0	0	<10,000	0	0	0
Oxfordshire	73,487	73,314	24,294	<10,000	0	14,033	<500	651	912
RLB Greenwich	<5,000	<5,000	5,202	15,061	<10,000	30,902	0	0	0
Kent	39,937	26,936	18,853	<10,000	<10,000	<10,000	4,698	5,317	4,099
LB Southwark	32,074	34,888	18,010	0	0	0	0	<500	<500

LB Enfield	20,134	18,809	17,674	72,838	57,158	<10,000	0	0	0
LB Barnet	0	<5,000	0	17,154	18,825	16,164	0	<500	<500
Derbyshire	10,139	9,223	9,256	0	0	<10,000	<500	0	<500
Rotherham	15,054	12,910	8,589	<10,000	0	<10,000	0	0	<500
LB Sutton	<5,000	<5,000	7,420	0	0	0	0	0	0
Solihull	20,095	11,612	6,273	0	0	<10,000	0	0	0
Leicestershire	<5,000	<5,000	5,812	0	0	0	<500	<500	<500
Medway	<5,000	<5,000	<5,000	<10,000	0	<10,000	786	912	903
Suffolk	<5,000	<5,000	<5,000	0	0	0	525	976	557
Wokingham	<5,000	<5,000	<5,000	<10,000	<10,000	<10,000	696	787	522
Sandwell	<5,000	<5,000	<5,000	0	0	0	<500	2,781	<500
LB Newham	<5,000	<5,000	<5,000	16,151	<10,000	<10,000	<500	<500	<500
LB Havering	<5,000	<5,000	0	11,560	17,248	0	0	0	0
West Berkshire	<5,000	<5,000	<5,000	14,181	<10,000	<10,000	<500	0	0

**Appendix 2: Destination Site receiving >5,000 tonnes of Non-Inert Waste from West London in 2021 (no additional significant sites in 2022)**

<b>Facility WPA</b>	<b>Site Category</b>	<b>Site Name</b>	<b>Operator</b>	<b>Principal Waste Type 5,000t or more</b>	<b>Total</b>
Hertfordshire	Treatment	Redbournbury Treatment Plant	Veolia ES (UK) Ltd	Liquid wastes other	11,066

### Appendix 3: Destination Sites receiving >10,000 tonnes of Inert Waste from West London in 2021 or 2022 only

Facility WPA	Site Category	Site Name	Operator	Principal Waste Type 10,00t or more	2021	2022
LB Enfield	Transfer	Pegamoid Site	J O' Doherty Haulage Ltd	Mixed CDE	28,240	37,935
	Treatment	Enfield Bund Soil Management Area	Jackson Remediation Ltd	Soils and stones	37,179	17,204
LB Havering		Frog Island	S Walsh & Son Ltd	Various wastes sub-10,000t	10,899	<10,000
LB Newham	Marshgate Sidings	Soils and stones		15,563	<10,000	
Thurrock	Landfill	East Tilbury Quarry		Soils and stones	14,821	0

## Appendix 4: Destination Site receiving >500 tonnes of Hazardous Waste from West London in 2022 (no additional significant sites in 2021)

Facility WPA	Site Category	Site Name	Operator	Principal Waste Type 500t or more	Total
Sandwell	Treatment	ERQ - STC	Waste Recycling Group (Central) Ltd	Asbestos CDE	2,762