

East London Joint Waste Plan

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

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1. Purpose

- 1.1 The report updates the forecast of Construction, Demolition and Excavation (C, D & E) estimated to be produced in East London during the period of the East London Joint Waste Plan (ELJWP) and forms part of the evidence base of the Plan.
- 1.2 For the purpose of this exercise East London is taken to comprise the following London Boroughs:
 - Barking & Dagenham;
 - Havering;
 - Newham; and
 - Redbridge(hereinafter referred to as "the East London Boroughs").

Principal Data Sources

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

Waste Data Interrogator

- 1.4 Operators of all sites subject to Environmental Permits relating to the management of waste in England are required to submit returns to the Environment Agency (EA). These returns set out the quantities, types and origin of waste received and, where applicable, destination and fate of waste removed across a calendar year. These returns are collated by the EA and reported in a national dataset known as the Waste Data Interrogator (WDI). The WDI is released approximately nine months after the end of the calendar year to which the data relates. The WDI (version 2 released January 2023) for the calendar year 2022, was the most current version available at the time of producing this assessment.

Advice on Data

- 1.5 The principal source of advice with respect to the use of data to inform production of a plan evidence base is the national Planning Practice Guidance (nPPG)¹. This states that:

"Assessing waste management needs for Local Plan making is likely to involve:

- *understanding waste arisings from within the planning authority area, including imports and exports*
- *identifying the waste management capacity gaps in total and by particular waste streams*
- *forecasting the waste arisings both at the end of the period that is being planned for and interim dates*
- *assessing the waste management capacity required to deal with forecast arisings at the interim dates and end of the plan period."*

Paragraph: 022 Reference ID: 28-022-20141016

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

1.6 The nPPG includes a section entitled " Using data to monitor and forecast waste needs", which articulates the following principles should waste planning authorities adopt when using data to plan for waste management:

- *Make clear assumptions on how data were handled, as well as their impact (including on forecasting)*
- *Provide data to an appropriate level of significance, based on their explicit assumptions. In practice, data quoted to more than 2 or 3 significant figures will not be helpful and spurious accuracy stemming from precise figures should be avoided*
- *Plan for a range of each type of waste rather than a specific single figure."*

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

Data Presentation

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

1. Any actual tonnage data accessed has been used in the computations.
2. Where data has been subject to computation, this is included to 3 significant figures.
3. Where percentages have been used to generate data, the percentages are presented as whole numbers, however the computations actually use the full value. This means that values presented may not always precisely correspond to the values computed when applying the percentage value presented in this report.
4. Final values discussed in the text are rounded to the nearest 500.

2. Methodology

2.1 C, D & E waste arising for East London in 2019 are reproduced in Table 1 below.

Table 1: C, D & E Waste Arisings in 2019
 Source: Anthesis 2022 ELJWP² Table 6

C&D	Inert / C+D	195,065
	Hazardous	292
Excavation	Inert / C+D	886,030
	Hazardous	12,242
Total		1,093,630

2.2 Table 2 shows C, D & E waste arisings from East London in 2022 applying an updated method.

Table 2: C, D & E Waste arisings from East London in 2022
 Source: WDI 2022 (Environment Agency)

Category	Type	Tonnes
C&D	Inert	211,389
	Non-inert	180,492
	Hazardous	341
Excavation	Inert	544,354
	Non-inert	15,630
	Hazardous	11,535
Total C, D & E waste		963,741

2.3 Table 2 shows a total of 963,741 tonnes of C, D & E waste was produced in East London in 2022. Although the method applied to generate the 2022 value includes additional waste codes (19 12 09 + 20 02 02) and non-inert C, D & E waste, the total arisings have fallen by 130,000 tonnes as compared with the 2019 arising estimation of 1,093,630 tonnes³.

² Evidence Base for the East London Joint Waste Plan for the East London Boroughs of Barking & Dagenham, Havering, Newham, and Redbridge. Anthesis Final Report (2022).

³ As the values were generated using different methods this comparison should not be taken to indicate a growth rate. Moreover Table 3 shows arisings have fluctuated significantly over a 4-year period.

3. Forecasting C, D & E Waste

- 3.1 In order to discern any trends in C, D & E waste arisings and to establish whether the forecasts remain robust, historical values for C, D & E waste arisings from 2019 to 2022 have been generated using the updated method. As hazardous arisings are addressed in a separate report⁴, the hazardous component of each waste type has been excluded from the forecasts and management profile.
- 3.2 These are displayed in Tables 3 and 4 below.

Table 3: Non-hazardous C, D & E Waste arisings from East London 2019-2022

Source: WDI (Environment Agency)

	Waste Type	2019	2020	2021	2022	Mean Value
C&D	Inert	122,576	207,295	130,634	208,388	167,223
	Non-inert	165,461	177,822	194,754	180,492	179,632
Excavation	Inert	920,999	968,892	544,950	547,354	745,549
	Non-inert	25,765	9,974	0	15,630	12,842
Total Non-Hazardous C, D & E waste		1,234,800	1,363,982	870,337	951,865	1,105,246
Growth Rate p.a		-	10.46%	-36.19%	9.37%	-5.45%

- 3.3 Table 3 shows that C, D & E waste arisings fluctuated over the 4-year period. Arisings increased in 2020 before decreasing to below 2019 levels in 2021 and experiencing a smaller increase in 2022. Although the principal impact of the Covid-19 pandemic was during 2020, arisings increased by +10.46% in 2020.
- 3.4 Given the high variability of arisings over the 4-year period, it is suggested to take an average (mean) of the arisings of each waste type as a baseline to project forward to the end of the Plan period. This is presented in Table 4 below.

Table 4: 2019-2022 Mean Non-hazardous C, D & E Waste arisings in East London by type

Category	Waste Type	Tonnes	
C&D	Inert	167,223	346,855
	Non-inert	179,632	
Excavation	Inert	745,549	758,391
	Non-inert	12,842	
Total C, D & E waste		1,105,246	

- 3.5 Table 4 shows that applying an average (mean) to the C, D & E waste arisings over the period 2019 to 2022 produces an arising value of c1.1M tonnes for use as a baseline to forecast from.

⁴ BPP Consulting Updated East London Hazardous Data Update 2022 (2024).

3.6 The nPPG states when looking to forecast C, D & E waste:

“Waste planning authorities should start from the basis that net arisings of construction and demolition waste will remain constant over time as there is likely to be a reduced evidence base on which forward projections can be based for construction and demolition wastes.”

3.7 Hence the starting point for any assessment is that there will be no growth in arisings over the Plan period. This would simply project forward the values shown in Table 4 for the Plan period (to 2041).

3.8 In addition, as a sensitivity the Greater London Authority (GLA) employment projections in the construction sector were used to generate an upper range forecast. This produced the forecast shown in Table 5 below.

Table 5: Forecast Non-hazardous C, D & E waste arisings for East London based on average C, D & E waste arisings 2019-2022 applying growth rate based on GLA sector employment projections

		2022	2026	2031	2036	2041 ⁵
C&D	Inert	167,223	174,667	186,158	191,907	197,832
	Non-inert	179,632	187,628	199,972	206,147	212,512
Excavation	Inert	745,549	778,734	829,970	855,597	882,016
	Non-inert	12,842	13,414	14,296	14,738	15,193
Total C, D & E waste		1,105,246	1,154,442	1,230,397	1,268,388	1,307,553
Growth Rate p.a.			4.45%	6.58%	3.09%	3.09%

3.9 Table 5 shows that C, D & E waste arisings could increase by c202,500 tonnes by 2041 if waste arisings were to grow at the same rate as construction sector employment. However, it is considered that this is unlikely to be the case due to various factors driving down per unit waste reduction in construction. This includes:

- The need to separate plasterboard offcuts from other waste types going to landfill;
- the increased segregation of materials at source to reduce disposal costs;
- the move to modular offsite fabrication reducing waste generation on each construction site - particularly when operating in space constrained sites such as those in urban areas like London; and,
- a sector initiative to drive towards Zero Avoidable Waste in Construction⁶ to meet the Government’s Resources and Waste Strategy (2018) stated ambition ‘to eliminate avoidable waste of all kinds by 2050’ in England, plus the residual waste reduction target adopted into law by *The Environmental Targets (Residual Waste) (England) Regulations 2023*.⁷

3.10 Therefore, the sensitivity forecast is considered to be worst-case, and not a reliable basis to plan future provision on.

⁵ Extrapolating growth rate in 2036 through to 2041.

⁶ *The Routemap for Zero Avoidable Waste in Construction* https://www.constructionleadershipcouncil.co.uk/wp-content/uploads/2021/07/ZAW-Interactive-Routemap_FINAL.pdf

⁷ <https://www.legislation.gov.uk/en/uksi/2023/92/made>

4. Profiling the Existing C, D & E Waste Management Methods

4.1 The management routes for Non-hazardous C, D & E waste arisings attributed to the East London boroughs in 2022 is set out in Table 6 below.

Table 6: Non-hazardous C, D & E Waste attributed to East London Waste Management Profile 2022

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D	Inert	185,859	0	336	3,750	18,444
	Non-inert	114,593	16,218	159	49,514	0
	Subtotal C&D	300,451	16,218	495	53,263	18,444
Excavation	Inert	127,083	11,750	203,482 ⁸	195,589	9,450
	Non-inert	0	0	15,630	0	0
	Subtotal Excavation	127,083	11,750	219,112	195,589	9,450

4.2 The management profile shown in Table 6 has been converted into percentages as shown in Table 7.

Table 7: Non-hazardous C, D & E Waste attributed to East London Waste Management Profile 2022

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D	Inert	48%	0%	<1%	1%	5%
	Non-inert	29%	4%	<1% ⁹	13%	0%
	Subtotal C&D	77%	4%	<1%	14%	5%
Excavation	Inert	23%	38% ¹⁰	0%	35%	2%
	Non-inert	0%	0%	3%	0%	0%
	Subtotal Excavation	23%	38%	3%	35%	2%

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

- 77% was managed at recycling facilities;
- 4% was recovered (either through incineration or recovery to land);
- <1% was managed at permitted landfills (possibly for use in restoration or operational needs);
- 14% was managed at intermediate sites prior to going on to its final fate (transferred); and
- 5% was managed via mobile plant (normally for recycling or reuse).

⁸ This tonnage is assumed to be used for restoration or operational purposes and therefore classed as recovery. Counted as recovery in profile below as per footnote 11.

⁹ Does not include residues from processing of mixed skip waste classed under EWC code 19 12 12 that may be landfilled as inactive waste under the Landfill Tax regime but would not be classed as inert under environmental permitting.

¹⁰ Including tonnage sent to landfill as per footnote 9 above.

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

- 23% was managed at recycling facilities;
- 38% was recovered (either through incineration or recovery to land);
- 3% was managed at permitted landfills;
- 35% was managed at intermediate sites prior to going on to its final fate (transferred); and
- 2% was managed via mobile plant (normally for recycling or reuse).

4.5 This compares with the following targets set in the London Plan for C, D & E waste generated in London in *Policy SI 7 Reducing waste and supporting the circular economy*:

- meet or exceed the targets for each of the following waste and material streams:
 - construction and demolition – 95 per cent reuse/recycling/recovery
 - excavation – 95 per cent beneficial use overall and 100% of inert excavation beneficial used.¹¹

¹¹ London Plan Footnote 164.

5. Accounting for waste reported in WDI for London as a whole

- 5.1 Data quality of the WDI relies on operators of permitted sites to report inputs down to origin Waste Planning Authority (WPA) level. A number of sites do not report inputs to that level, preferring to report at regional level only i.e. to London only. This means that there is a potential for an underestimation of the tonnage of waste arising in East London that is not attributed down to or below regional level.
- 5.2 The WDI 2022 reports nearly 9 million tonnes of waste from London that is not attributed down to WPA level below London. In addition, over 4 million tonnes was misattributed to ELWA, which the Environment Agency has now explained ought also to be counted as waste arising in London not attributed down to WPA level²². The total tonnages are set out by type in Table 8 below:

Table 8: Totals of waste not attributed below London received at permitted site in England

Source: WDI 2022

	Hazardous	Hhold/Ind/Com	Inert/C+D	Grand Total
Tonnes Reported as Received	198,724	5,634,830	7,331,425	13,164,979

- 5.3 Given the substantial tonnage of waste to be attributed, an assessment has been undertaken to establish if an amount might reasonably be considered to arise from East London itself. Given HIC waste is subject to London Plan apportionments, and hazardous waste is also reported through the Environment Agency Hazardous Waste Interrogator, the focus of this exercise is on accounting for the C, D & E waste tonnage of nearly 7.5 million not attributed below London in 2022.
- 5.4 One approach taken to reattribute these wastes is to consider the tonnages accepted at sites within each WPA, on the presumption that C, D & E waste will not travel far. However, given the compact nature of London (the inner city in particular) and WPAs that have few if any suitable waste management sites available, it is not considered appropriate to apply this approach in this case.
- 5.5 Given that the GLA data on employment in the construction sector has been used as a proxy for construction activity within the East London Boroughs for the purposes of forecasting arisings, this dataset has been referenced to establish a proxy for allocating the arisings between Boroughs across London. Table 9 sets out the employment values for 2021, the most recent estimate, with the Boroughs grouped according to the waste planning areas that exist.

²² Email from Dr Matthew Caple 15th April 2024.

Table 9: Construction Sector Employment Values
Source GLA Labour Data Statistics

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

5.6 Applying the above percentages to the unattributed inert/C+D waste total gives the tonnages of waste displayed in Table 10 below.

Table 10: Waste not attributed below London region, allocated across London sub-regions using Construction Sector Employment data as proxy

Source: Table 8 & Table 9

London Sub-region	Tonnes
Central London	1,017,972
East London	1,017,972
North London	1,644,416
South East London	841,785
South London	802,632
West London	1,331,194
Western Riverside	675,385
Total	7,331,356

5.7 Hence to ensure that the tonnage of waste not attributed below London is planned for i.e. not orphaned, it is proposed to add a further million tonnes to the total considered for management from East London as a sensitivity.

Composition of Reattributed C, D & E waste from East London

5.8 In order to estimate the composition of C, D & E waste reattributed to East London, and hence its suitability for particular management methods, the tonnages reported under the Inert/ C+D category attributed to London as a whole have been split between material type¹³ as shown in Table 11 below.

Table 11: Allocation of Inert/ C+D Waste from Waste attributed to London as a whole

Source: WDI 2022

Category	Type	Percentage (rounded)
C&D	Inert	17%
	Non-inert	28%
Excavation	Inert	55%
	Non-inert	<1%

5.9 Applying the proportions shown in Table 11 to the tonnage of reattributed non-hazardous C, D & E waste from East London provides the profile shown in Table 12 below.

¹³ It is noted that although the WDI classes wastes under Inert C+D category this includes non-inert waste codes.

Table 12: Composition of Reattributed Non-hazardous C, D & E waste from East London

Category	Type	Tonnes ¹⁴
C&D	Inert	177,349
	Non-inert	280,829
Excavation	Inert	556,821
	Non-inert	2,974
Total		1,017,972

5.10 The reattributed waste by material type from East London shown in Table 12 has been added to the mean C, D & E waste baseline from East London shown in Table 4 to produce a sensitivity baseline as shown in Table 13 below.

Table 13: Non-hazardous C, D & E Waste Baseline arisings in East London including reattributed Waste from London as whole

Source: Table 4 plus Table 12

Category	Type	Tonnes	
C&D	Inert	344,572	805,033
	Non-inert	460,461	
Excavation	Inert	1,302,370	1,318,185
	Non-inert	15,816	
Total C, D & E waste		2,123,218	

5.11 Table 13 shows that by adding the reattributed waste from East London to the average C, D & E waste arisings over the period 2019 to 2022 produces an arising value of c2.1M tonnes as a starting sensitivity baseline to forecast from.

5.12 Applying the sector employment growth rates, the forecast shown in Table 14 is arrived at.

Table 14: Forecast Non-hazardous C, D & E waste arisings for East London based on average Non-hazardous C, D & E waste arisings 2019-2022 plus reattributed Non-hazardous C, D & E waste from London applying growth rate based on GLA sector employment projections

Source: Table 13 plus GLA sector employment projections¹⁵ Table 7

		2022	2026	2031	2036	2041 ¹⁶
C&D	Inert	344,572	359,905	383,585	395,429	407,638
	Non-inert	460,461	480,951	512,594	528,422	544,738
Excavation	Inert	1,302,370	1,360,323	1,449,823	1,494,590	1,540,739
	Non-inert	15,816	16,520	17,607	18,150	18,711
Total C, D & E waste		2,123,218	2,217,698	2,363,608	2,436,590	2,511,826
Growth Rate p.a.			4.45%	6.58%	3.09%	3.09%

¹⁴ Values do not directly correspond to % in Table 11 due to rounding.

¹⁵ Evidence Base for the East London Joint Waste Plan for the East London Boroughs of Barking & Dagenham, Havering, Newham, and Redbridge. Anthesis Final Report (2022).

¹⁶ Extrapolating growth rate in 2036 through to 2041.

5.13 Table 14 shows that C, D & E waste arisings could increase to from 2.1M tonnes in 2022 to just over 2.5 million tonnes at 2041 if the upper range worst case growth scenario is used as a sensitivity. However as explained above the growth rate is considered to be unreliable and therefore a static forecast using the adjusted arising value of 2,123,218 tpa has been adopted, as per nPPG advice.

Profiling the Reattributed C, D & E waste from East London

5.14 In order to estimate the management profile of C, D & E waste reattributed to East London, the tonnages reported under Inert/ C+D waste not attributed below London as a whole have been interrogated to arrive at the management profile shown in Table 15.

Table 15: Non-hazardous Inert/ C+D Waste from Waste from London as a whole by Waste Management Profile 2022

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D	Inert	31%	<1%	1%	6%	<1%
	Non-inert	29%	<1%	<1%	32%	0%
	Subtotal C&D	60%	<1%	1%	38%	<1%
Excavation	Inert	<1%	10%	36%	25%	<1%
	Non-inert	0%	0%	<1%	0%	<1%
	Subtotal Excavation	30%	10%	36%	25%	<1%

5.15 Applying the proportions shown in Table 15 to the tonnage of non-hazardous C, D & E waste from London reattributed to East London gives the management profile by tonnage shown in Table 16 below

Table 16: Waste Management Profile of reattributed Non-hazardous C, D & E waste from London as a whole (tonnes)

Source: Table 15 + Table 12

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D	Inert	315,706	2,911	6,626	63,658	2,735
	Non-inert	298,476	43	1,170	326,647	0
	Subtotal C&D	614,182	2,954	7,796	390,305	2,735
Excavation	Inert	300,700	97,393	0	252,361	2,035
	Non-inert	372	0	1,642	0	150
	Subtotal Excavation	301,073	97,393	1,642	252,361	2,184

5.16 To establish a final management profile of attributed East London and reattributed London C, D & E waste, the values in Table 16 have been combined with the tonnages attributed directly to East London (shown in Table 6) to produce the tonnages shown in Table 17.

Table 17: Waste Management Profile of East London Waste including reattributed Waste from London as a whole (tonnes)

Source: Table 6 + Table 16

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D	Inert	501,564	2,911	6,962	67,408	21,179
	Non-inert	413,069	16,261	1,329	376,161	0
	Subtotal C&D	914,633	19,172	8,291	443,569	21,179
Excavation	Inert	427,783	109,143	566,801	447,951	11,485
	Non-inert	372	0	17,272	0	150
	Subtotal Excavation	428,156	109,143	584,073	447,951	11,634

5.17 This produces the management profile shown in Table 18 below.

Table 18: Non-hazardous C, D & E Waste attributed to East London plus reattributed Non-hazardous C, D & E Waste from London Combined Waste Management Profile 2022

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D	Inert	36%	<1%	<1%	5%	2%
	Non-inert	29%	1%	<1% ¹⁷	27%	0%
	Subtotal C&D	65%	1%	<1%	32%	2%
Excavation	Inert	27%	43% ¹⁸	0%	28%	1%
	Non-inert	<1%	0%	1%	0%	<1%
	Subtotal Excavation	27%	43%	1%	28%	1%

5.18 To summarise the management profile for non-hazardous C& D waste is as set out below:

- 65% was managed at recycling facilities;
- 1% was recovered (either through incineration or recovery to land);
- <1% was managed at permitted landfills;
- 32% was managed at intermediate sites and transferred on for recovery or disposal; and
- 2% was managed via mobile plant (normally for recycling or reuse).

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

- 27% was managed at recycling facilities;
- 43% was recovered (through recovery to land including use in restoration or operational needs on permitted landfills);
- 1% was managed at permitted landfills (dredging spoil);
- 28% was managed at intermediate sites and transferred on for recovery or disposal; and
- 1% was managed via mobile plant (normally for recycling or reuse).

¹⁷ Does not include residues from processing of mixed skip waste classed under EWC code 19 12 12 that may be landfilled as inactive waste under the Landfill Tax regime but would not be classed as inert under environmental permitting.

¹⁸ Including 36% sent to landfill taken to be used for restoration or operational purposes.

5.20 This compares with the following targets set in the London Plan for C, D & E waste generated in London in *Policy SI 7 Reducing waste and supporting the circular economy*:

- meet or exceed the targets for each of the following waste and material streams:
 - construction and demolition – 95 per cent reuse/recycling/recovery
 - excavation – 95 per cent beneficial use overall and 100% of inert excavation beneficially used.¹⁹

5.21 When the different categories of site are assigned by activity, performance against the London Plan targets as shown in Table 19 is indicated. The major uncertainty is the final destination for waste managed initially at sites classed as waste transfer.

Table 19: Non-hazardous C, D & E Waste attributed to East London plus reattributed Non-hazardous C, D & E Waste from London as whole Combined Waste Management Profile 2022

Category	Activity	Recycling	Recovery	Landfill	Transfer	Mobile Plant	Total
C&D	Recovery inc recycling	65%	1%	-	32%	2%	>68%
	Other	-	-	<1% ²⁰		-	<32%
Inert Excavation	Recovery inc recycling	27%	7%	36% ²¹	28%	1%	>71%
	Other	-	-	-		-	<28%
All Excavation	Recovery inc recycling	27%	7%	36%	28%	1%	>71%
	Other	-	-	1%		-	<29%

¹⁹ London Plan Footnote 164.

²⁰ Does not include residues from processing of mixed skip waste classed under EWC code 19 12 12 that may be landfilled as inactive waste under the Landfill Tax regime but would not be classed as inert under environmental permitting.

²¹ Taken to be used for restoration or operational purposes which is classed as recovery.