Appeal ref: APP/L5810/W/20/3249153, 23-27 Arlington Works, Arlington Road, Twickenham TW1 2BB

Proof of evidence - reason for refusal No.1 - loss of designated waste site

December 2020

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Quality Assurance – Approval Status

This document has been prepared and checked in accordance with
Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS EN ISO 45001:2018)

Issue	Date	Prepared by	Checked by	Approved by
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Comments

Comments

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1. Summary

1.1. In this proof of evidence I confirm the size of the area lawfully permitted to manage waste is 0.08 ha. I compare the size of the area lawfully permitted to waste with the land take for various waste facility types. I consider the scale to be insufficient to support the waste management facility types identified in the ODPM study, or the WLWP. I consider compensatory provision for loss of a designated waste site. I confirm the appellant is seeking to identify compensatory capacity for 13,404 tonnes of hazardous waste. Discussions are progressing and will be updated at the Public Inquiry. Finally, I compare the throughput of the waste site with information as to the likely viability required for oil regeneration plant.

2. Introduction

Qualifications and experience

2.1. My name is Matthew Mehegan. I am a Technical Director at Waterman Infrastructure & Environment Ltd (Waterman). I hold a Joint Honours Batchelor of Science Degree in Oceanography and Soil Science. I have been working in the field of waste since 1995. Initially, as a monitoring and enforcement officer with the Waste Regulation Authority (WRA) of Kent County Council (KCC). The WRA function was subsumed into the Environment Agency (EA) on its creation in 1996. I left the EA in 1998 to work as a planning Enforcement Officer for KCC, staying there until 2002.

2.2. Since then I have been an employed as consultant, practising in the field of environmental permitting and planning in so far as these disciplines concern waste. My current role includes preparing planning applications for waste facilities, and this includes shaping proposals to reflect waste planning policy. In terms of professional qualifications in the field of planning I was elected as a Technical Member of the Royal Town Planning Institute (TechRTPI) on 22 October 2003. This membership class was automatically transferred to Associate (AssocRTPI) on 1 January 2017.

Affirmation

2.3. The evidence I have prepared and the opinions expressed are my true and professional opinions.

Involvement with the appeal site

2.4. During February 2017 Waterman was approached by Indigo Planning Ltd (Indigo) (now WSP). It transpired Indigo had been in liaison with London Borough of Richmond upon Thames (LBRuT) as to the redevelopment of the appeal site for non-waste uses. I understood pre-application liaison had previously taken place between the appellant and LBRuT. Amongst, other matters I was given to understand LBRuT wanted the appellant to take account of a waste use safeguarding designation in the Development Plan. I visited the appeal site in March 2017. Waterman was subsequently instructed by the appellant.

2.5. In July 2018 Waterman prepared a report[1] (the "Waterman Report") for the appellant to include with its planning application for the redevelopment of its site. Section (1.1) of the report confirms the brief for the work included *"to report upon the impact of waste planning policies influencing the redevelopment of its* [the appellant's] *waste facility".*

2.6. LBRuT refused the planning application (reference 18/2714/FUL)[2], which is now subject of this appeal. My evidence addresses reason number 1 for refusal: loss a designated waste site.

2.7. A description of the site and surrounding area is given in the Statement of Common Ground (SoCG)[3].

2.8. My proof of evidence concerns the area lawfully permitted to manage waste within the appeal site.

2.9. I will:

- confirm the size of the area lawfully permitted to manage waste;
- rely on work prepared for the appellant's planning application comparing the size of the area lawfully permitted to manage waste against the land take for various waste facility types;

[1] CDF43.
[2] CDH7.
[3] CDI4.

- consider compensatory provision for loss of a designated waste site; and
- compare the throughput of the waste site with information as to the likely viability required for oil regeneration plant.

3. The size of the site

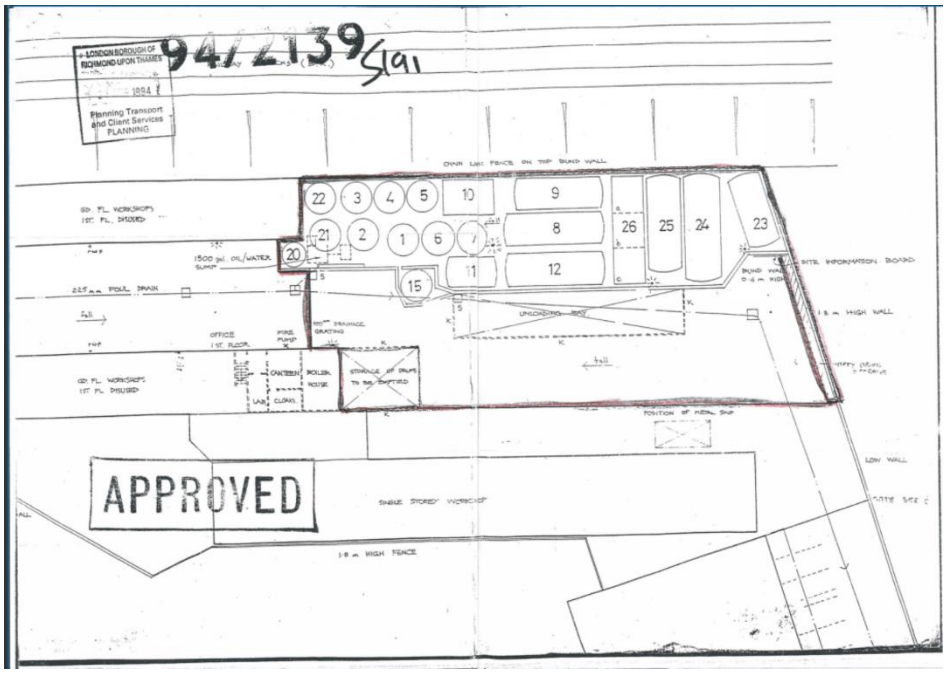
The Waterman Report

3.1. In the Waterman Report I noted that the West London Waste Plan July 2015 (WLWP)[4] safeguarded sites that were *"lawfully permitted"*[5] to manage waste. And I explained the planning history to the appeal site included a Certificate of Lawful Use or Development (CLEUD)[6]. The certificate was produced by LBRuT and in it the council certifies the land enjoys the following use:

- *"Use for the refining of waste oil (other than petroleum or petroleum products) (to include the use of fuel storage tanks in this connection)".*

3.2. The area of land over which the certified use applies is shown outlined in red ink on the plan in the Second Schedule to the certificate. I reproduce a copy of the plan in the Second Schedule in the figure below.

Figure 1: Plan in the Second Schedule to Certificate of Lawful Use or Development (ref: 94/2139/S191)



3.3. In the Waterman Report I took the CLEUD site to amount to some 0.05 ha of land. In preparing for this planning inquiry I note LBRuT state the site size as 0.08 ha[7]. I am recently advised by the appellant's architect[8] of the same figure. I agree the site is 0.08 ha in size. I am also advised by the appellant's architect the tank farm itself is about 0.04 ha in size.

3.4. I note land within the CLEUD area includes:

1) the area of the tank farm;

[4] CDB3.
[5] Footnote (28) of CDB3.
[6] Provided in CDF43 at Appendix C. The certificate is referenced 94/2139/S191, London Borough of Richmond upon Thames, dated 18 October 1994.
[7] Paragraph (4.1) of CDI1.
[8] Brookes Architects Ltd.

2) the roadway used to access the other land uses at the appeal site.

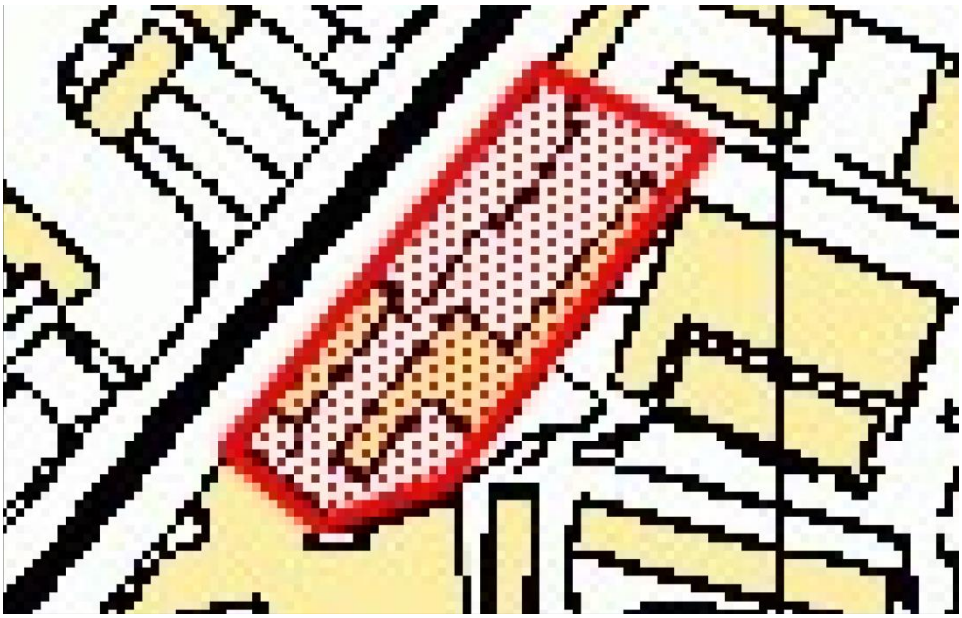
3.5. I further note the CLEUD area excludes areas labelled as “boiler house” and “lab” on the plan in the Second Schedule.

West London Waste Plan

3.6. During the production of the West London Waste Plan (WLWP) the constituent councils developed an “evidence base”. It serves to document the councils’ processes; it includes assessments and reports. One of the reports in the evidence base (CDE17) contains an assessment of Arlington Works - *“Site Report for 335”*[9].

3.7. I included a copy of the assessment in the Waterman Report. The Site Report includes a plan. The land referred to in the Site Report is shown bound by a red line. I reproduce an extract of the plan in the figure below.

Figure 2: Extracted image from Site Report for 335 – evidence base to the WLWP



3.8. It can be inferred from the plan the red line encloses:

1) the area of the tank farm;
2) the roadway used to access the other land uses at the appeal site; and
3) buildings at the site.

3.9. I note the area outlined in red does not include access from the highway, Arlington Road.

3.10. The site is given as 0.23 ha in size.

Waste Sites Monitoring Report

3.11. The WLWP was adopted in 2015 and section (7) of it sets out that the implementation and effectiveness of the plan will be reported upon annually in Authority Monitoring Reports (AMRs). Only one Waste Sites Monitoring report has been produced to date. It was published in October

[9] Site Report for 335, Arlington Works, Appendix 5 – Site Assessment Sheets for remaining sites assessed, CDE17.

2017, and covers the period 1 April 2016 to 31 March 2017[10]. Included within the report[11] are:

- *"Plans of Existing safeguarded Waste Sites in the LB of Richmond upon Thames…".*

3.12. The plans provided in the report depict the spatial extent of the safeguarded waste sites in the borough. I include a copy of the plan provided for *"Sharpes Oils, Arlington Works, Permitted Waste Facility"* at Appendix A to this proof. I provide an extract of the plan in the figure below.

Figure 3: Extent of Arlington Works – as depicted in Waste Sites Monitoring report

3.13. I note the land shaded in orange includes:

1) the area of the tank farm;
2) the roadway used to access the other land uses at the appeal site.

3.14. I note the WLWP defines existing waste management sites at footnote (28):

- *"Existing waste management sites are those sites managing waste which are lawfully permitted to do so as set out in Appendix 2. The latest list of existing waste management sites will be found in Authority Monitoring Reports. Safeguarded existing permitted facilities and allocated sites will be shown on the Policies Maps associated with each Borough's Local Plan".*

3.15. I note this definition was added as a main modification to the WLWP and that it was required *"in order to ensure the effectiveness of the policy and the Plan"*[12]. I note the modification took place during 2015.

3.16. By way of comparison, I note the work culminating in the production of the "Site Report for 335" (which I refer to at paragraph (3.6)) was undertaken at an earlier point in time, namely during the evidence gathering stages underpinning the development of the WLWP. I note the written report containing the Site Report is dated January 2011 (report reference provided at footnote (9)). And I note the text at the bottom of the Site Report itself confirms it was *"Created on 01/02/2011"*.

3.17. It seems plausible to me that LBRuT's knowledge as to the spatial extent of the waste site evolved during the period between January 2011 and October 2017.

3.18. In my opinion the area of land shown in the Waste Sites Monitoring report covers the same portion of land shown in the CLEUD that I refer to above. It therefore seems to me the portion of land shown in the Waste Sites Monitoring report would also be approximately 0.08 ha in size.

[10] CDE12.
[11] Pages 12, 13, 14 and 15 of CDE12.
[12] Paragraph (44), CDE7.

3.19. The area of the lawful use as certified by the CLEUD (0.08 ha) is about 35%[13] of the area depicted in the documents within the WLWP evidence base (0.23 ha).

[13] 0.08 ÷ 0.23 x 100 = 34.8%

4. The potential for other waste uses to occupy the site

4.1. In the Waterman Report I note the residential character of Arlington Road[14] and that the site *"…is accessed from a relatively long and narrow site road…"* the north-western end of which *"…turns sharply by 90 degrees to form a central spine road…"*. In the report I compare the size of the CLEUD area against the land take for various waste facility types. Site size data reported in a research study commissioned by the Office of the Deputy Prime Minister (the "ODPM study"[15]), and in the evidence base in WLWP, were used. The land take for a selection of facility types were tabulated. And a comparison was made against the size of the CLEUD area. The conclusions included: *"that the site is of a scale insufficient to support the waste management facility types identified in the ODPM study, or the WLWP"*.

4.2. I also noted that the site *"scored poorly in independent studies undertaken for the WLWP. Challenges with using the site include the access route and that it lies close to potentially sensitive receptors".*

4.3. I report in paragraph (3.3) above that I now understand the CLEUD area to be 0.08 ha in size. I consider this would not make an appreciable difference to my findings; I would still consider the scale to be insufficient to support the waste management facility types identified in the ODPM study, or the WLWP.

[14] Section (2) of CDF43.
[15] CDE18.

5. Compensatory provision

Calculating the compensatory provision

5.1. In the table below I present the quantum of waste material managed at the site over the period January 2015 to 31 December 2020.

Table 1: Tonnage received by the site during a calendar year (January to December)

Year	Tonnes[16]	Comments
2015	8,466	
2016	9,688	
2017	13,404	
2018	9,234	The waste use ceased in 2018
2019	0	Waste use not operational
2020	0	Waste use not operational

5.2. Observations:

1) mean average over the most recent three year period = 3,078 tonnes[17];
2) mean average over the most recent five year period = 6,465 tonnes[18];
3) maximum annual throughput achieved during the last five years = 13,404 tonnes.

5.3. I note the tonnage figures stated in the officer's report[19] to planning committee at the time of the refusal. The officer stated a three year rolling average of 10,512.462 tonnes. The report was presented on 18 September 2019, but did not include data for the calendar year to 2018.

5.4. Had the officer included data for 2018 I calculate the average would have been 10,775 tonnes.

5.5. I note LBRuT's Statement of Case presents the same figures[20] as in the officer's report.

5.6. In the Waterman Report I considered whether paragraph (6.3.2) of the written statement to the WLWP would assist in clarifying the Plan's requirements. I noted the origin for the development of the WLWP included the direction set out in the London Plan, and I identified policy 5.17(H). The policy lays beneath the heading *"LDF preparation"*, I consider purposes for the policy include tasking policy makers with an obligation (when developing policy) to take account of the loss of sites and to provide for their replacement over the plan period.

5.7. In the Waterman Report I reflected on the meaning for the word *"can"* offering the interpretation *"is able to"*. And I took the view that policy makers exercised choice in finding expressions that best suited their goals. I noted *"must"* or *"is"* provided was not said. The Waterman Report was drafted in July 2018.

5.8. The London Plan – Intend to Publish version, was published in December 2019. Policy SI 9 (D) says:

- *"Development proposals that would result in the loss of existing sites for the treatment and/or disposal of hazardous waste should not be permitted unless compensatory hazardous waste*

[16] Data returns made to the Environment Agency.
[17] The sum being 9,234 + 0 + 0 = 9,234 ÷ 3 = 3,078 tonnes.
[18] The sum being 9,688 + 13,404 + 9,234 + 0 + 0 = 32,326 ÷ 5 = 6,465.2 tonnes.
[19] Paragraph (89), officer's report to Planning Committee, London Borough of Richmond Upon Thames, 18 September 2019.
[20] Paragraph (10.15), CDI1.

site provision has been secured in accordance with this policy".

5.9. The written statement (to the London Plan – Intend to Publish version) clarifies:

- *"Any proposed release of current waste sites or those identified for future waste management capacity should be part of a plan-led process, rather than done on an ad-hoc basis. Waste sites should only be released to other land uses where waste processing capacity is re-provided elsewhere within London, based on the maximum achievable throughput of the site proposed to be lost. When assessing the throughput of a site, the maximum throughput achieved over the last five years should be used; where this is not available potential capacity of the site should be appropriately assessed"*[21].

5.10. I now consider the amount of compensatory capacity the appellant may have to plan for. At the time of drafting the Waterman Report the facility was operational, and LBRuT had proposed 12,000 tonnes[22]. At that time it was also the case that a three year rolling average was the relevant measure. Today, the three year rolling average would be 3,078 tonnes. As stated in paragraph (5.9) the written statement clarifies that the maximum throughput achieved over the last five years should be used; so that would be 13,404 tonnes. In order to be compliant with policy SI 9 this is the figure the appellant intends to make compensatory provision for.

5.11. I note however the oil processing use has now ceased. Given this I consider the policy may allow for the capacity to be assessed in an alternative way. Potentially, the capacity should be assessed on an area basis. I note paragraph (4.2.4) of the WLWP determined land requirements (for apportioned waste) on the basis of 65,000 tonnes per hectare. By calculation then: 0.08 ha x 65,000 tonnes ha^{-1} = 5,200 tonnes would be the compensatory provision required.

5.12. Paragraph (10.20) of LBRuT's Statement of Case includes the following:

- *"…it is not considered that the information supplied within the Waterman report sufficiently identifies that additional compensatory hazardous waste capacity does not exist within the West London waste Plan Area".*

5.13. I presume the "*not considered"* and "*does not exist"* are a typographical error, as the statements appear contradictory. If not it appears counter to the remaining sentences in the paragraph, which include:

- *"…the submitted report does no* [sic] *identify any agreement or other appropriate means by which suitable compensatory site provision has been secured…"*

5.14. I note at paragraph (10.16), LBRuT Statement of Case says

- *"…the Council accepts that should* ***available***[23] *capacity up to 12,000 tonnes of hazardous waste be available within the West London Waste Plan area; the redevelopment of the Arlington Works site for non- waste purposes could be considered acceptable…"*

5.15. In response, I present data as to available capacity below.

5.16. As to whether the capacity lies within the WLWP area I note that the Old Oak and Park Royal Development Corporation (OPDC) adopted the WLWP in July 2015[24]. I also note from the WLWP[25] it is accepted that waste moves into and out of the Plan area for management; the waste marketplace disregarding administrative borders.

5.17. In terms of geographical context I include extracts of plans showing the London boroughs (Plan A) ,

[21] Paragraph (9.9.2), The London Plan, Intend to Publish, Spatial Development Strategy for Greater London, Mayor of London, Greater London Authority, December 2019.
[22] As stated in at section (6.1.2) of CDF43. And now as stated at paragraph (10.16) of CDI1.
[23] Emphasis added by Waterman.
[24] Paragraph (1.3.2) of CDB3.
[25] Paragraph (3.9.1) of CDB3.

the WLWP area (Plan B) and the extent of the OPDC (Plan C) at Appendix B.

Hazardous waste capacity in the area

5.18. I provide an update of returns data[26] from the Environment Agency (EA) for selected hazardous waste sites in the London area including:

- Associated Reclaimed Oils (now trading as ENVA), Royal Borough of Greenwich;
- Brent Oil Contractors, Wembley, London Borough of Brent;
- Powerday, London Borough of Hammersmith and Fulham[27]; and
- Williams Environmental, Silvertown, London Borough of Newham.

5.19. I compare the hazardous waste capacity used at these sites versus the permitted capacity and state the difference between the two. The unexploited capacity is shown in the table below.

Table 2: Unexploited hazardous waste capacity

Operator Name	London Borough	Site Activity	In WLWP area?	Counted Against Apportionment?	Unexploited capacity[28] (tonnes)
Associated Reclaimed Oils (ENVA)	Royal Borough of Greenwich	Oil Reclamation Facility	No	Unknown	9,800
Brent Oil Contractors	London Borough of Brent	Oil Reclamation Facility	Yes	Yes	258
Powerday	Hammersmith and Fulham	CDE waste processing / transfer	No	Yes	58,959
Williams Environmental	Silvertown, London Borough of Newham	Oil Reclamation Facility	No	Unknown	19,429
Total unused hazardous waste capacity					**88,446**

5.20. The data used in devising the table above are presented in Appendix C.

5.21. The Waterman Report included data for a site operated by Heathrow Airport Limited at Cranford Lane. Paragraph (10.18) LBRuT's Statement of Case notes this to be a non-hazardous waste transfer station. I agree. The quantity shown for the site in Table 6 to the Waterman Report should therefore be disregarded.

5.22. Table 2 demonstrates that unexploited hazardous waste capacity exists, including:

- 258 tonnes in the WLWP area;
- 58,959 tonnes adjacent to the eastern margin of WLWP boundary (within the OPDC); and
- some 29,229 tonnes elsewhere within London.

[26] Data are released by the EA for each calendar year in the product known as Waste Data Interrogator. Data are typically released by October for the previous calendar year.
[27] The Powerday site is within the OPDC. It lies adjacent (and external to) the eastern boundary of WLWP area. The site is shown on Plan C in Appendix B.
[28] Based on the highest throughput of hazardous waste during the years 2015, 2016, 2017, 2018 and 2019.

5.23. A further hazardous waste treatment facility has been identified in the WLWP area. Heathrow Airport Limited holds a permit[29] for the treatment of up to 192 tonnes per day (which if scaled up to an annual tonnage could amount to some 70,000 tonnes per year[30]) of hazardous and non-hazardous sweepings from within the airport (presumed to arise from mechanical sweeping of various areas of hardstanding within the airport). The permit was issued at the end of 2015 however no data are reported for that permitted facility in subsequent years. It is therefore assumed the site is not operational and so its capacity is unexploited. The airport is operational so sweepings waste can be reasonably assumed to still be arising, presumably taking up treatment or disposal capacity elsewhere.

5.24. With respect to the waste type that needs to be provided for I note the email correspondence between LBRuT and Indigo[31] wherein LBRuT said:

- *"We have already confirmed that following the London Plan, policy 5.19, 12,000 tonnes of another hazardous waste stream, is fine."*

5.25. With respect to where the provision needs to be made I note email correspondence between LBRuT and Indigo[32] wherein LBRuT said:

- *"…The Council has already confirmed agreement to this approach at the pre-app meeting. The West London Waste Plan area has to be reviewed as a priority. If the capacity cannot be accommodated within the WLWP area then you may consider the wider London generally. The Council will be reluctant to accept an alternative location outside of London at this stage..."*

Discussions with existing waste sites in the area to deliver compensatory provision

5.26. The appellant has approached several parties in order to identify 13,404 tonnes of hazardous waste compensatory capacity. At the time this proof of evidence was being completed discussions were progressing. I reserve the right to provide an update at the Public Inquiry.

[29] Permit EPR/DP3035AY Airside Snowbase, Hounslow TW6 2GW.
[30] The sum being 192 x 365 = 70,080 tonnes.
[31] LBRuT's email dated 18 April 2018 at 11:27 hours (LBRuT / Indigo).
[32] LBRuT's email dated 07 March 2018 at 15:13 hours (LBRuT / Indigo).

6. Viability of waste oil treatment process

6.1. At paragraph (4.47) of the appellant's Statement of Case I note the viability of the waste oil treatment process is referred to.

6.2. I note the facility at the appeal site was closed in 2018, I understand it has since been decommissioned.

6.3. I note the viability of oil regeneration plant is referred to in the evidence base documents to the WLWP:

- ***"Oil regeneration plant***
- *The National Strategy identifies a need for further capacity for recycling used lubricants to a very high level back into base lubricating oil. At present, most waste oil is processed into a fuel substitute and used for energy recovery. However, to realise the benefits of moving the management of this waste up the waste hierarchy, capacity for the regeneration of waste oil needs to be increased. Any oil regeneration plant is likely to have a capacity of at least 70,000 tonnes per annum to be viable and new facilities are therefore expected to be nationally significant infrastructure. A number of facilities within the Plan Area manage waste oils receiving significant quantities in 2012 (7,700 tonnes into the Sharpes Recycle Oil Reclamation Facility & 2,150 tonnes into the Brent Oil Contractors Transfer Station). If the Government strategy objectives are to be met then it may be that capacity will need to be expanded or adapted."*[33]

6.4. In conclusion I note (in the last five years) the appellant's site operated at less than 20%[34] of the figure considered to be a viable minimum.

[33] Section (5.9) of CDE9.
[34] The sum being 13,040 ÷ 70,000 x 100 = 18.6%

7. Conclusion

7.1. The area lawfully permitted to manage waste is 0.08 ha. The waste site is no longer operational and the site has been decommissioned.

7.2. The scale of the lawfully permitted area is insufficient to support the waste management facility types identified in the ODPM study, or the WLWP. Over the last five years the appellant's site operated at less than 20% of the figure considered to be a viable minimum for oil regeneration plant.

7.3. There is unexploited hazardous waste capacity in the WLWP and wider London areas. This includes a site in the OPDC area immediately adjacent to the waste plan area boundary.

7.4. The appellant is seeking to identify compensatory capacity. The appellant intends to identify provision for the higher figure of 13,404 tonnes required by Policy SI 9 (D) of the London Plan – Intend to Publish 2019. Discussions are progressing and will be updated at the Public Inquiry.

APPENDICES

A. Extent of the safeguarded waste site - Sharpes Oils, Arlington Works

- Plan extracted from: Waste Sites Monitoring, 1/4/2016 – 31/3/2017, Planning, London Borough of Richmond Upon Thames, October 2017.

B. Geographical context: the London boroughs, the WLWP area and the extent of the OPDC

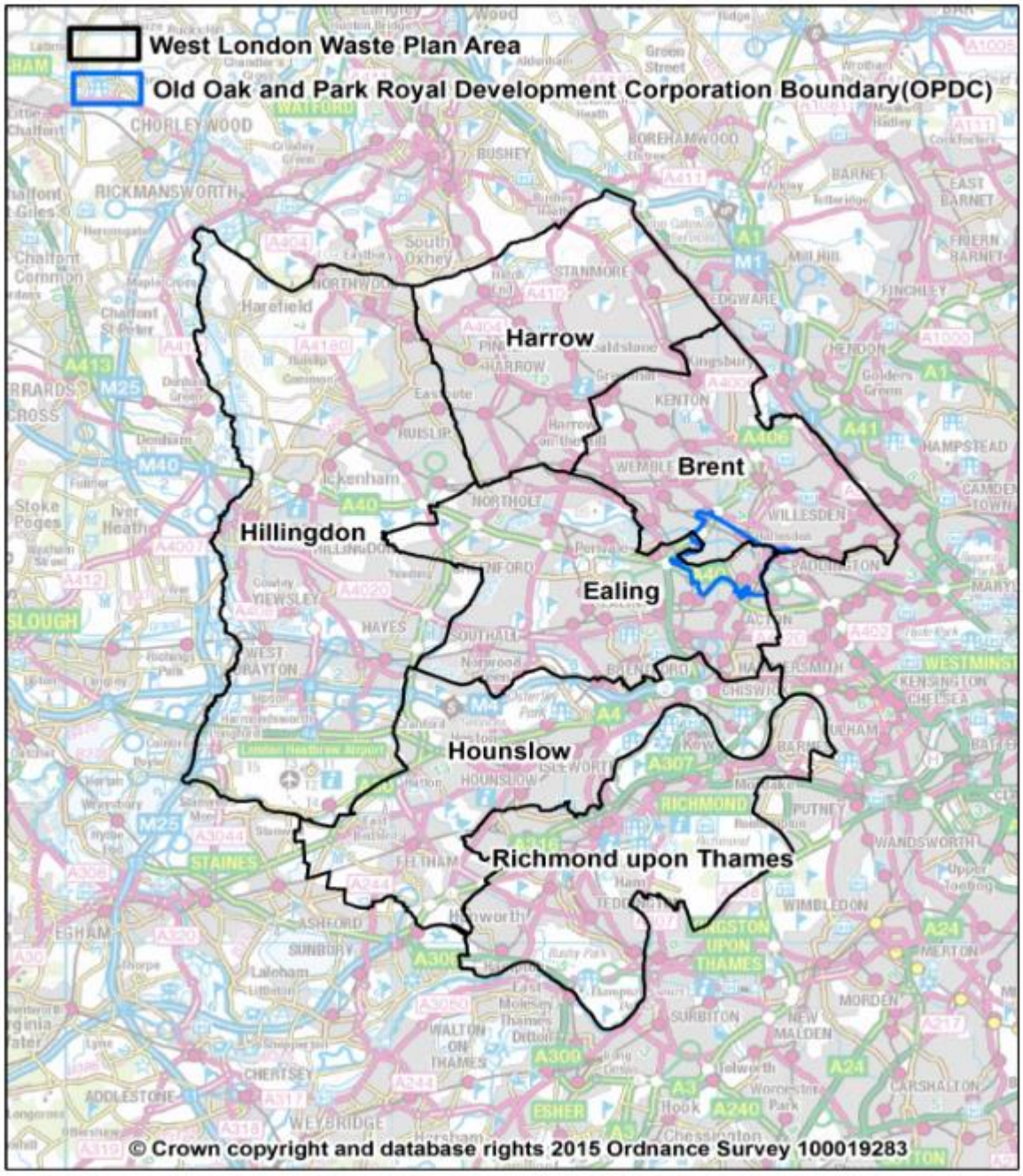
Plan A: Waste authority areas in London (OPDC area in red)

Source: Figure 4, Waste Strategy, Local Plan Supporting Study, Draft for Regulation 18 Consultation, OPDC - Old Oak and Park Royal Development Corporation, Mayor of London, 4 February 2016.

Accessible at:

https://www.london.gov.uk/sites/default/files/opdc_waste_study_final_new_cover.pdf.

Plan B: The West London Waste Plan Area (OPDC area in blue)



Source: Figure 1-1, CDB3.

Plan C: Old Oak and Park Royal Development Corporation (OPDC) Boundary

The Powerday site

Source of image: Figure 1, Waste Strategy, Local Plan Supporting Study, Draft for Regulation 18 Consultation, OPDC - Old Oak and Park Royal Development Corporation, Mayor of London, 4 February 2016.

Accessible at:

https://www.london.gov.uk/sites/default/files/opdc_waste_study_final_new_cover.pdf.

Annotation showing location of Powerday site added by Waterman.

C. Hazardous waste capacity data

Hazardous Waste Facilities		Associated Reclaimed Oils	Brent Oil Contractors	Powerday	Williams Environmental Management
Location		Royal Borough of Greenwich	London Borough of Brent	London Borough of Hammersmith and Fulham (OPDC)	London Borough of Newham
Permit reference		WP3930UD	YP3732MN	YP3338FF	WP3336SA
Permitted annual tonnage		21,000	4,000	60,000	25,000
Comment on permitted annual tonnage		Permit separately limits hazardous waste (21,000 tonnes per year)	Includes hazardous and non-hazardous waste	Permit separately limits hazardous waste (60,000 tonnes per year)	Includes hazardous and non-hazardous waste
Tonnes of hazardous waste accepted for calendar years (note 1):	**2015**	8,517	3,039	169	2,137
	2016	9,179	no data available	219	5,005
	2017	10,659	no data available	351	2,088
	2018	no data available	no data available	236	1,593
	2019	11,200	3,725	1,041	1,601
Tonnes of non-hazardous waste accepted for calendar years (note 1):	**2015**	not applicable to this assessment (note 4)	5	not applicable to this assessment (note 4)	504
	2016		no data available		395
	2017		no data available		566
	2018		no data available		399
	2019		17		397
Three-year rolling average (hazardous waste)		7,286	1,242	543	1,761
Five-year rolling average (hazardous waste)		7,911	1,353	403	2,485

Hazardous Waste Facilities	Associated Reclaimed Oils	Brent Oil Contractors	Powerday	Williams Environmental Management
Three-year rolling average (non-hazardous waste)	not applicable to this assessment (note 4)	6	not applicable to this assessment (note 4)	454
Five-year rolling average (non-hazardous waste)		4		452
Unused hazardous waste capacity (based on three year rolling average) (note 2)	Limited data	Limited data	59,457	22,785
Unused hazardous waste capacity (based on five year rolling average) (note 2)	13,089	Limited data	59,597	
Unused hazardous waste capacity (based on highest annual throughout in five year period) (note 2)	**9,800**	**258**	**58,959**	**19,429**
Total unused hazardous waste capacity (tonnes)		**88,446**		

Note 1 Data obtained from Environment Agency waste data interrogator - which collates data returns submitted by permitted waste site operators on a calendar year basis.

Note 2 Permitted capacity minus three or five year rolling average hazardous waste accepted minus three or five year rolling average non-hazardous waste (where single permit limit applies to both waste types).

Note 3 Permitted capacity minus highest annual throughput hazardous waste accepted minus highest annual throughput non-hazardous waste (where single permit limit applies to both waste types) (figures in red text used).

Note 4 The site accepts non-hazardous waste under separate permit capacity limit. It is not relevant to the assessment of hazardous waste capacity to consider non-hazardous waste accepted.

UK and Ireland Office Locations