Public Document Pack

FULL COUNCIL

Monday 16 November 2026 at 6.00 pm
Conference Hall - Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ

Supplementary Agenda Pack

Agena Item 14: West London Waste Plan - Appendices

Attached are the following appendices listed for consideration as part of the above item within the main Cabinet agenda pack:

Appendix A: Regulation 19 Proposed Submission West London Waste Plan

Appendix B: Integrated Impact Assessment

Due to their file size, these have been published as a supplementary attachment to the main Cabinet agenda.

recycle for Brent

Regulation 19

Proposed Submission West London Waste Plan

May 2026

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Abbreviations

AMR	Authority Monitoring Report
BAP	Biodiversity Action Plans
CCC	Climate Change Committee
CCUS	Carbon capture, use and storage
CE	Circular economy
C, D & E	Construction, demolition and excavation
C&I	Commercial and Industrial
EIP	Environmental Improvement Plan
GLA	Greater London Authority
HIC	Household, Industrial and Commercial waste
HRA	Habitats Regulation Assessment
LACW	Local Authority Collected Waste
LNR	Local Nature Reserve
Mtpa	Million tonnes per annum
MBT	Mechanical Biological Treatment
NPPF	National Planning Policy Framework
OFWAT	Office of the Water Regulator
OPDC	Old Oak & Park Royal Development Corporation
OS	Ordnance Survey
RBMP	River Basin Management Plan
RDF	Refuse Derived Fuel
RWS	Resources and Waste Strategy
SIL	Strategic Industrial Location
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
tpa	tonnes per annum

WDI	Waste Data Interrogator
WLLPAs	West London Local Planning Authorities
WLWA	West London Waste Authority
WLWP	West London Waste Plan
WLWP 2015	West London Waste Plan 2015
WPA	Waste Planning Authority

Chapter 1: Executive Summary

1.1 Managing waste is a key part of a well-functioning modern society. If waste is not handled in the right facilities or locations, it can harm both the environment and local communities. The National Planning Policy for Waste (NPPW) requires all waste plans to follow the waste hierarchy, which prioritises prevention, reuse, recycling, and then recovery over disposal. It also encourages managing waste close to where it is produced. Because of this, the future management of waste needs to be carefully planned for, and it is a statutory requirement for each waste planning authority to have a 'waste local plan' that sets out how and where waste is to be managed.

1.2 The West London Waste Plan (WLWP) plans for the management of waste through to 2041 within the following London boroughs: Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames. Those parts of the boroughs of Brent and Ealing that fall under the planning jurisdiction of the Old Oak & Park Royal Development Corporation (OPDC) are also included. Together these seven local planning authorities are referred to as the West London Local Planning Authorities (WLLPAs).

1.3 This West London Waste Plan (WLWP) covers all types of waste expected to be produced within west London during the Plan period. It focuses especially on the management of Household, Industrial and Commercial (HIC) waste, Construction, Demolition and Excavation (C, D & E) waste and Hazardous waste. In doing so this version of the WLWP takes account of the requirements of the London Plan and the West London Waste Authority's strategy for managing Local Authority Collected Waste (LACW).

1.4 This document is the Proposed Submission version of the WLWP for which the WLLPAs are publishing to receive representations on soundness and legal compliance as part of the statutory 'Regulation 19' consultation. Once adopted, this WLWP will replace the WLWP 2015 and form part of each local planning authority's wider development plan. It will sit

alongside their adopted local plans, the London Plan and any relevant neighbourhood plan(s). This WLWP is designed to support existing planning policies rather than repeat them.

1.5 This WLWP includes a Vision and five Strategic Objectives, along with seven policies that will guide decisions about waste related planning applications, or applications for planning permission which would impact on safeguarded waste sites as follows:

- Policy WLWP 1 – Safeguarding and Optimising Waste Site Network
- Policy WLWP 2 – Provision of additional Waste Management Capacity
- Policy WLWP 3 – Residual Waste Management & Energy Recovery
- Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities
- Policy WLWP 5 – Recovery and Disposal of Waste to Land.
- Policy WLWP 6 – Circular Economy & Resource Efficiency
- Policy WLWP 7 – Wastewater Infrastructure

1.6 These policies aim to ensure that waste related development, such as new or expanded waste management facilities, is well located and does not cause harm to local communities or the environment. They provide a clear framework to support waste management development to meet emerging needs, protect existing capacity and allow for the release of land from waste use where appropriate.

1.7 The most recent assessment shows that west London has sufficient capacity for the management of current and forecast future waste arisings, other than for landfill. This includes the amounts of HIC waste apportioned for management by each London borough in the 2021 London Plan through to 2041. Therefore, there is no immediate need for more waste management capacity within the Plan area.

1.8 This WLWP is considered to be in general conformity with the requirements of the 2021 London Plan. However the London Plan is under

review and once the new version is adopted, this WLWP may also need to be reviewed to ensure it aligns with it. In addition, the possibility of the Heathrow Airport expansion plan going ahead within the Plan period, may also trigger an early review, depending on its precise implications for provision of waste management capacity in west London.

1.9 This WLWP proposes to protect most existing waste sites in west London. It also supports additional waste development where such development will help achieve the Plan's goals. It does not identify specific areas of land for the development of additional waste management capacity.

Chapter 2: Introduction and background

What is the West London Waste Plan?

2.1 The efficient and effective management of waste is an important aspect of a well-functioning society. While essential, waste management has the potential to cause impacts on the environment and communities if it is not undertaken in the right facilities located in the right place.

2.2 It is a statutory requirement for each area to have a 'waste local plan' that sets out how and where waste, expected to be produced within the area, is to be managed. Policies in waste local plans are used by the responsible decision-maker, usually the Local Planning Authority (LPA) alongside policies contained in other development plan documents, to determine applications for planning permission relating to waste development.

2.3 In west London, the current version of the West London Waste Plan (WLWP 2015), was adopted in 2015 and plans for the management of waste over the period until 2031 within the following local planning authority areas located in west London ('the WLLPAs'):

- London Borough of Brent
- London Borough of Ealing
- London Borough of Harrow
- London Borough of Hillingdon
- London Borough of Hounslow
- London Borough of Richmond upon Thames
- Parts of Brent and Ealing that fall under the jurisdiction of the Old Oak & Park Royal Development Corporation.

2.4 Once adopted, this version of the West London Waste Plan ('WLWP' or 'the Plan'), replaces the West London Waste Plan 2015 taking account of changes in policy and taking the planning horizon forward for another 15

years. The adopted West London Waste Plan forms part of each authority's Development Plan.

2.5 A map of the area covered by the Plan (the Plan area) is presented in Figure 1. The other areas of London are also responsible for preparing their own plans and/or planning policies for waste in order that the requirements of the extant London Plan are met.

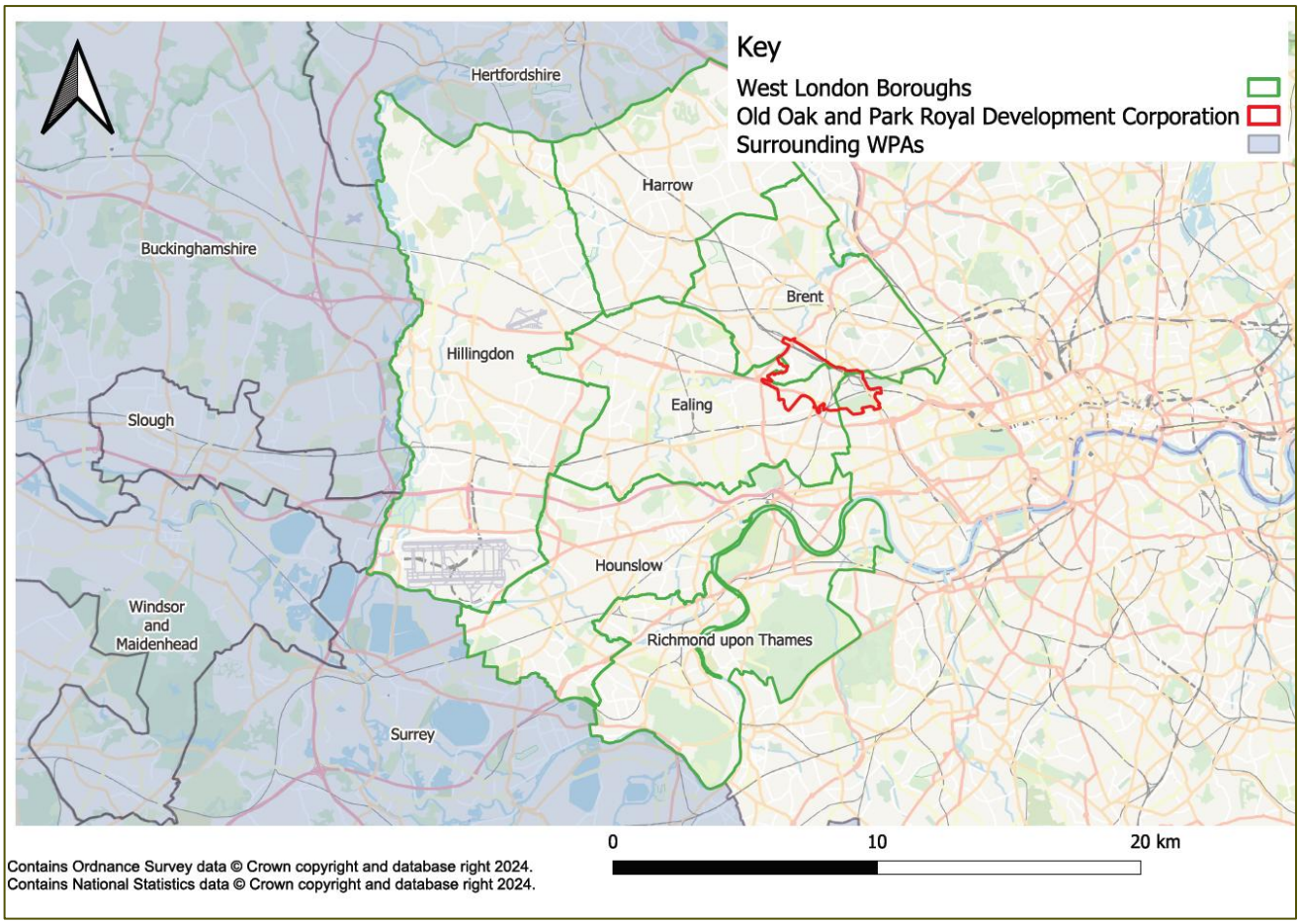


Figure 1: Map of West London Waste Plan area

The need to replace the current WLWP

2.6 Waste management is a rapidly evolving sector, shaped by new initiatives aimed at reducing waste generation and ongoing innovation in the way it is managed.

2.7 Once adopted, the WLLPAs will use the policies in this WLWP when determining planning applications relating to waste management development, so it is essential that the Plan provides an up-to-date policy framework that reflects these changes to support the more sustainable management of waste that is produced.

2.8 Through safeguarding existing capacity and ensuring that additional waste management capacity provided within the Plan area is of the right type and in the right locations and contributes towards more sustainable management of waste when it is needed, this WLWP will ensure that there continues to be sufficient capacity to manage waste in west London over the Plan period.

The process of preparing the West London Waste Plan

2.9 The process by which a local plan is prepared is prescribed in legislation[1] and policy [2]. A Consultation Protocol sets out how communities and stakeholders have been engaged during the preparation of the Plan.

2.10 The key elements of this West London Waste Plan are:

- Vision
- Strategic Objectives
- Policies
- Policies Map
- Monitoring Framework

2.11 Together, these elements set out how and where the WLLPAs intend the management of waste to take place in west London.

[1] Planning and Compulsory Purchase Act 2004 and the Town and Country (Local Planning) (England) Regulations 2012

[2] National Planning Policy Framework, December 2024

2.12 The Vision and Strategic Objectives set out how waste ought to be managed to ensure its management benefits, protects and enhances communities and the environment of west London. The Policies and Policies Map are intended to ensure the Vision is realised and the Strategic Objectives are achieved. To ensure the objectives of this Plan are being met and the policies are working effectively, certain indicators (as set out in Appendix 1) will be monitored on a regular basis.

This version of the WLWP

2.13 This 'Regulation 19' Proposed Submission Version of the WLWP has been prepared taking account of comments received on an earlier draft WLWP (Regulation 18 version) that was consulted upon between December 2025 and February 2026. The WLLPAs responses to the specific submissions received are set out in a separate document available to access on the website.

2.14 Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires Waste Planning Authorities (WPA) to publish the version of the Plan in advance of its submission to the Secretary of State for examination, for a minimum period of six weeks. During this period representations can be made on the soundness and legal compliance of the Plan. A representation form and guidance note is available and should be used and referenced by anyone wishing to make such a representation.

2.15 This Regulation 19 Proposed Submission WLWP has been evaluated through a Sustainability Appraisal which is incorporated into an 'Integrated Impact Assessment' (IIA) published alongside this Plan. In addition, a Habitat Regulations Assessment (HRA) has been undertaken to assess any potential adverse impacts on designated habitat sites. The IIA serves as a framework for assessing and communicating the possible effects of a plan, and the reasonable alternative courses of action available to that proposed, focussing on key sustainability aspects. The main objective of the IIA is to inform and influence the development of

the Plan so as to avoid, and if necessary mitigate, negative impacts that might occur. By adopting this approach, the IIA aims to maximise the Plan's contribution toward sustainable development. The IIA and HRA have been published as part of the suite of consultation documents. Topic Papers that explore the key considerations underpinning this Plan are published alongside this version of the Plan as well.

2.16 Following the period for representations, the WLLPAs intend to submit the Plan for examination, along with the evidence base and all the representations received. The Plan can only be adopted if following examination, the appointed independent Inspector finds the Plan to be sound and legally compliant.

Supporting documents

2.17 This Proposed Submission WLWP is supported by the following evidence base documents including:

- Integrated Impact Assessment comprising:
  - Sustainability Appraisal
  - Habitats Regulation Assessment
  - Equalities Impact Assessment
  - Health Impact Assessment
- Strategic Flood Risk Assessment
- Waste Capacity Assessment and Arisings Estimates
- Strategic Waste Flows Report
- Existing Safeguarded Sites for Release – Assessment Report
- Climate Change Topic Paper
- Circular Economy Topic Paper
- Waste Management in West London Topic Paper

2.18 This Proposed Submission WLWP and all evidence base documents can be found on the following website: https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

How to comment on this Version of the WLWP

2.19 Representations are invited on this Plan's soundness and matters relating to its legal compliance. These can be submitted by the deadline specified on the consultation website via:

- the consultation website using the online form, or
- by email to wlwasteplan@ealing.gov.uk; or
- in hard copy to the address below.

  Planning and Infrastructure

  West London Alliance

  Ealing Council

  5th Floor, Perceval House

  14-16 Uxbridge Road

  Ealing, W5 2HL

2.20 Guidance on how to respond is included in the Consultation Protocol available online. A copy of the Protocol and response form may be requested from the email address above.

Chapter 3: The Plan Context

Spatial Portrait

3.1 This section sets out the key spatial characteristics and constraints affecting development involving the management of waste in west London, providing the context for the West London Waste Plan (WLWP).

3.2 West London is a diverse sub-region comprising dense urban centres, established industrial hubs, strategic transport corridors, and extensive green spaces. Waste management development in this area is shaped by a combination of opportunities and challenges. Strategic industrial areas provide essential locations for waste management facilities, while major regeneration areas are delivering new homes and employment space that will increase waste generation but also create opportunities for innovative and sustainable management solutions.

3.3 Waste management development is constrained by the presence of residential areas and other sensitive land uses particularly, Green Belt, Metropolitan Open Land (MOL), heritage and conservation designations, ecological protections, and widespread Air Quality Management Areas (AQMAs). In addition the presence of Heathrow Airport and RAF Northolt introduce aerodrome safeguarding considerations. It is also acknowledged, the prospect of the expansion of Heathrow Airport will place pressure on certain existing waste sites.

3.4 Transport infrastructure, including road, rail, and waterborne freight networks, also plays a critical role in determining where waste produced in West London ends up being managed.

3.5 These unique spatial characteristics determine the location of existing waste management facilities within each local planning authority area, and availability of land to support expansion of the network where needed.

Local Planning Authority-Level Summaries

London Borough of Brent

3.6 In Brent, Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) in Wembley, Neasden and Alperton currently host waste management facilities. Growth and regeneration across the borough are driving high-density development, which requires integrated waste solutions. Road transport is supported by the A406, A5, and M1 corridors, though congestion is a major challenge. Railheads for materials transportation exist in Wembley and Neasden. Environmental and land-use constraints include AQMA coverage, flood risk along the River Brent, and the protected Welsh Harp Reservoir (SSSI). Brent currently accommodates 10 existing waste facilities adjudged to be lawful (excluding those located in OPDC), and its overarching strategy is to protect and modernise them while promoting low-carbon transport solutions. Three existing waste sites identified within the adopted Brent Local Plan for comprehensive, residential-led redevelopment are put forward in this Plan for release from safeguarding, as their continued safeguarding and use for waste is likely to conflict with wider planning and regeneration objectives of the adopted Local Plan.

London Borough of Ealing

3.7 Ealing's strategic industrial areas, including Greenford, Perivale, Northolt, and Southall host several waste management facilities. The Southall Opportunity Area is expected to generate significant additional waste, highlighting the need to embed circular economy principles into development. The A40, A406, and Uxbridge Road provide vital transport routes, with further potential for rail-based waste movement. Future development is constrained by AQMA coverage, Green Belt land, and flood risk in Southall and Acton. With 14 existing waste facilities in operation adjudged to be lawful (excluding those located in OPDC), Ealing's strategy is to safeguard existing suitable sites, establish circular economy hubs, and expand rail-based freight transport.

London Borough of Harrow

3.8 Harrow has limited industrial land, with only Wealdstone and Honeypot Lane designated as SIL or LSIS. Regeneration in Wealdstone and Harrow Town Centre will increase waste production, but space for new waste management facilities is scarce. The borough lacks major highways or rail freight links, making it reliant on local road transport. Additional constraints include AQMA coverage and significant areas of Green Belt. Harrow currently hosts only two existing waste facilities adjudged to be lawful, and its strategy is to protect and intensify their use where needed, while integrating waste infrastructure into any major non-waste developments and supporting localised recycling facilities.

London Borough of Hillingdon

3.9 Hillingdon benefits from industrial and transport hubs, including Heathrow Airport and the Hayes and West Drayton Corridor, which generate substantial quantities of commercial and industrial waste. In addition, the proposed expansion of Heathrow Airport can be expected to place additional pressure on waste infrastructure if it goes ahead. Existing infrastructure includes the West Drayton Waste Transfer Station, the South Hillingdon Recycling Centre, and former mineral sites such as Harmondsworth Quarry. Transport strengths include access to the M4, A40, M25, and West Drayton Rail Freight Terminal, as well as the Grand Union Canal, which offers potential for non-road waste movement. However, Green Belt, AQMA coverage, and flood risk from the River Colne and canal present constraints. With 21 existing waste facilities adjudged to be lawful, Hillingdon's strategy is to modernise and intensify existing sites where needed, expand sustainable transport use, and safeguard key facilities from displacement by redevelopment.

London Borough of Hounslow

3.10 Hounslow's Strategic Industrial Locations (SIL), including in Brentford along the Great West Road, and the North Feltham Trading Estate, and other local sites (LSIS), accommodate a number of existing waste management facilities. Growth pressures from the Great West Corridor and Heathrow Opportunity Areas are expected to increase demand for waste management capacity. The M4 provides a strategic road link, supplemented by rail freight at Transport Avenue and potential river transport via the Thames. Constraints include high air pollution along the A4/M4, flood risk in Brentford and Feltham, and extensive Green Belt. With 10 existing waste facilities adjudged to be lawful, the borough aims to expand low-carbon waste management, modernise and intensify existing sites where needed, and increase sustainable waste movements through utilising river and rail-based waste transport options. One existing waste site identified within the Hounslow Local Plan for comprehensive, residential-led redevelopment is to be released from safeguarding, as its continued safeguarding and use for waste is likely to conflict with wider planning and regeneration objectives of the Local Plan.

Old Oak & Park Royal Development Corporation (OPDC)

3.11 The OPDC area includes London's largest Strategic Industrial Location, accommodating around 2,000 businesses in sectors such as logistics, food production, and creative industries. It is also one of the UK's largest regeneration projects, supporting the delivery of tens of thousands of new homes and jobs. Existing waste management facilities are located within Park Royal SIL as well as in areas planned for new mixed-use neighbourhoods. Transport links are strong, with the A40, A406, multiple rail connections, and the Grand Union Canal offering multimodal opportunities. However, constraints include AQMA coverage, the proximity of Wormwood Scrubs MOL, High Speed 2 (HS2) construction impacts, and flood risk from the canal. With five existing waste facilities adjudged to be lawful, the OPDC's strategy is to safeguard existing waste infrastructure

when it doesn't conflict with wider development aspirations, embed waste solutions into regeneration, and promote rail and canal-based waste transport. Two waste sites identified for comprehensive redevelopment are to be released from safeguarding, as their continued safeguarding and use for waste is likely to conflict with wider planning and regeneration objectives of the Local Plan.

London Borough of Richmond upon Thames

3.12 Richmond upon Thames has the smallest industrial base in west London, with just four existing waste facilities adjudged to be lawful, most notably the Townmead Road Council Depot, a Household Waste & Recycling Centre, a composting site in Kew Gardens and a dormant waste oil treatment site at Arlington Works. Regeneration in Mortlake, Twickenham, and Richmond will increase waste generation, but opportunities for developing additional capacity are extremely limited. The borough's constraints include extensive protected land, such as Richmond Park and Kew Gardens, alongside Green Belt, Metropolitan Open Land (MOL), and flood-prone riverfront areas. The Borough is rich in built heritage and has a number of protected vistas/views. Transport capacity is constrained, though there may be limited scope for river-based waste movement on the Thames. Richmond's strategy is to safeguard existing facilities, integrate waste solutions into redevelopment where possible, and develop Circular Economy hubs.

Common Themes

3.13 Several themes emerge from the above Plan area analysis. First, competition for land and conflicting uses highlights the need to safeguard existing waste facilities, particularly where they are located on industrial sites. Waste management facilities are often under residential and commercial redevelopment pressure, while other brownfield land is productively used and designations such as Green Belt and MOL limit opportunities for expansion. This means intensification and modernisation of existing waste sites should be prioritised.

3.14 Second, regeneration projects and circular economy initiatives present opportunities for integration of waste management. Growth areas are expected to generate significant additional amounts of waste, but could also create opportunities for circular economy hubs, facilitating reuse and recycling of materials, and possible co-location of compatible industries.

3.15 Third, environmental challenges such as climate change require resilient infrastructure and low-emission technologies to protect air and soil quality, mitigate flood risk, and deliver biodiversity net gain.

3.16 Finally, transport and logistics remain a central concern. Congestion on key routes, including the A40, A406, A316, M4, and the North Circular hampers efficiency, while opportunities for rail and river freight at locations such as West Drayton, Brentford, using the Grand Union Canal and the River Thames, should be fully exploited.

Proposed Planning Strategy

3.17 To address these issues, the planning strategy for waste in west London focuses on two key areas:

a. First, maintaining sufficient suitable management capacity by safeguarding key existing waste sites and providing for the use of such sites to be intensified to meet emerging needs, where appropriate.

b. Second, high standards of environmental protection in line with best practice be applied to all facilities whether new or expanded, including robust emissions controls, enclosed operations, sustainable drainage systems, and climate resilience measures, ensuring that waste management safeguards health, enhances local amenity, and supports wider environmental goals. Finally, encouraging the increased use of low-carbon transport, with greater use of rail and river freight supported by electric and low-emission vehicles for road-based transport.

Chapter 4: Waste Management in West London

4.1 The legal definition of waste, set out in section 75(2) of the Environmental Protection Act 1990[3] is, "..any substance or object which the holder discards, or intends or is required to, discard". The key concept relates to the producer or holder's intention regardless of whether the waste may have a value to the recipient.

Scope of this WLWP

4.2 This WLWP focuses on providing management capacity for the principal types of waste produced within west London, which are as follows.

Local Authority Collected Waste (mainly household waste) (LACW)

4.3 Local Authority Collected Waste (LACW) consists of waste which comes into the possession of, or under the control of, the local authority including waste collected from households (household waste). LACW collected by or on behalf of local authorities can include household waste (residual, dry mixed recycling and food waste), street sweepings, green waste from maintenance of open spaces, and a small quantity of clinical waste[4]. Depending upon the local arrangements, LACW can include waste from businesses collected by trade waste operations.

Commercial and Industrial Waste (from businesses & industry) (C&I waste)

4.4 Commercial and industrial Waste (C&I) is waste produced by businesses. A significant proportion of commercial waste (c60%) is also classed as municipal waste, which is subject to statutory management targets that also affect LACW set out in a subsequent section of this Plan.

[3] Transposing the Waste Framework Directive as amended 2008/98/EC

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

4.5 These first two categories of waste (LACW and C&I) are combined into a single category of 'household, industrial and commercial' waste in the London Plan ('HIC waste' for short). The London Plan apportions quantities of forecast HIC waste arisings to each Borough within London for provision of management capacity through to 2041. The 'HIC waste' categorisation is used throughout this Plan reflecting the influence of the London Plan on this Plan's approach/trajectory.

Construction, Demolition and Excavation Waste (C, D & E waste)

4.6 Construction, demolition & excavation (C, D & E) waste comprises waste arising from construction and demolition activity, and is made up of mainly inert[5] materials such as concrete, brick and tile and soils and stone excavated during ground work prior to construction. However, non-inert elements such as wood, metals, plastics, cardboard, and plasterboard may also be present in this waste stream. Due to their weight, the inert elements generally make up the majority (c.80%) of the total tonnage.

4.7 The London Plan deals with construction and demolition waste separately to excavation waste, as excavation waste is not normally suited to recycling, and this distinction is recognised in the waste evidence reports that support this Plan. The London Plan does not apportion quantities of C & D waste for management, but this Plan still plans for this waste stream.

Hazardous Waste

4.8 Hazardous wastes are categorised as those that are harmful to human health, or the environment, either immediately or over an extended period of time. In west London, hazardous waste arises mainly from: construction and demolition activity, vehicle maintenance and/or dismantling activity and healthcare. Hazardous waste may be present in C, D & E waste particularly when development takes place on brownfield sites that have been affected by historical contamination.

[5] Inert waste is defined as "waste that does not undergo any significant physical, chemical or biological transformations".

4.9 The London Plan states that hazardous waste arising in the HIC waste stream (to which the apportionments relate) is included in the apportioned tonnages, and therefore does not distinguish its management needs from the non-hazardous component of HIC waste. However, for the purposes of this Plan, all hazardous waste has been considered and planned for separately. Therefore, to some degree there will be an element of double counting between the London Plan apportionment values and hazardous waste management capacity needs identified.

Existing Waste Management Sites in West London

4.10 There are a range of existing waste facilities located in west London that manage waste both arising within and outside west London. It is intended that 66 sites be safeguarded through this Plan for ongoing waste management uses and their location is shown in Figure 2 below.

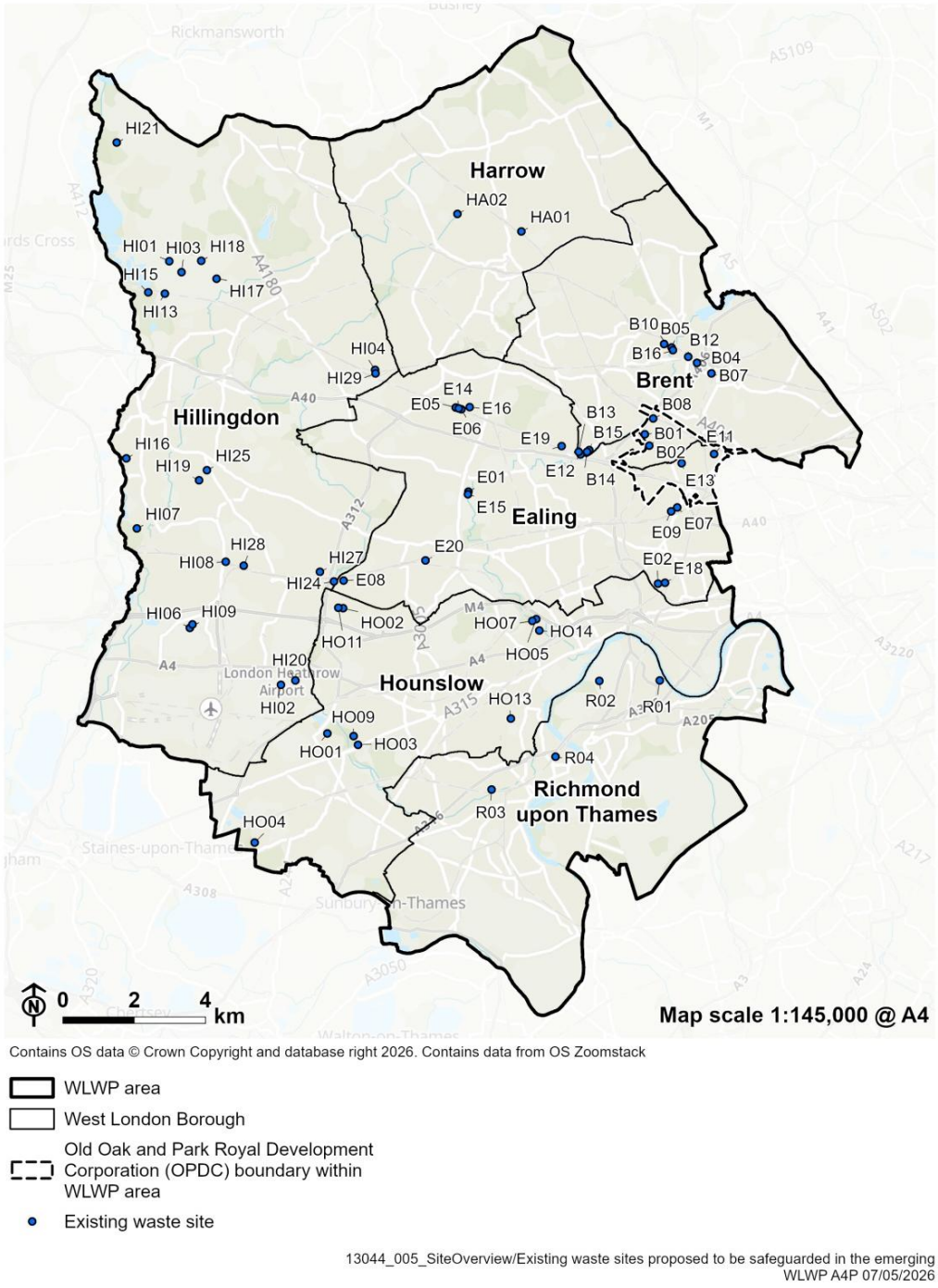


Figure 2: Map of West London Existing Waste Sites to be Safeguarded

Chapter 5: The Policy Context

5.1 The policy context within which the WLWP sits is illustrated in Figure 3 below.

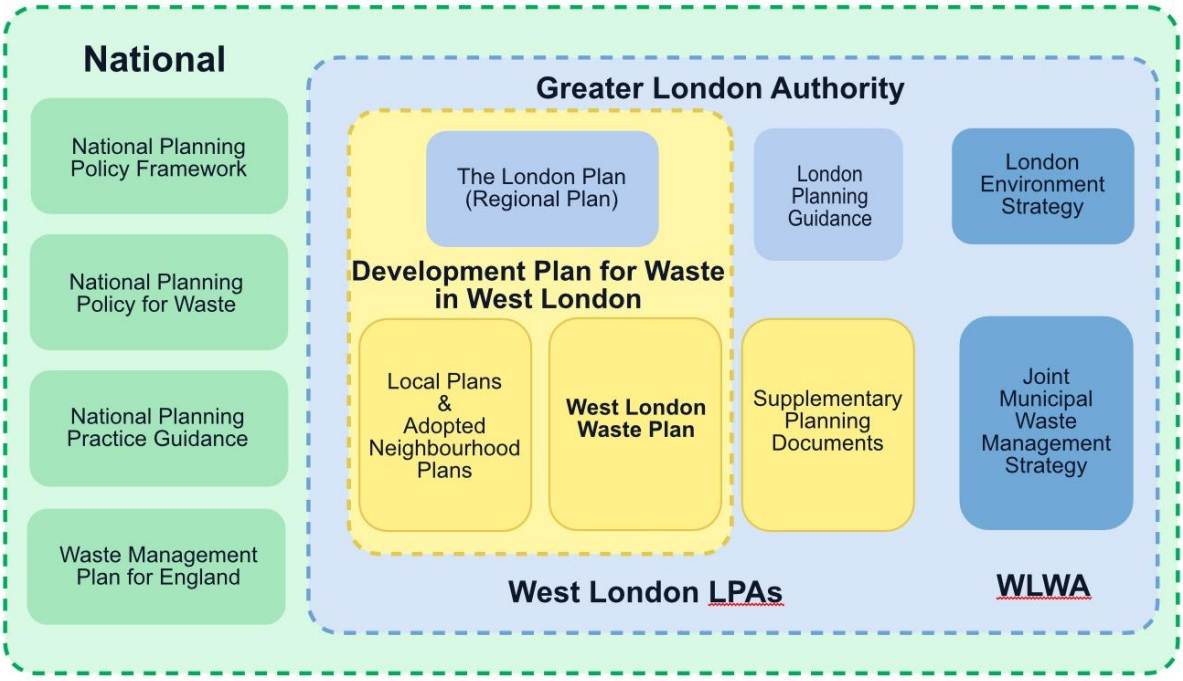


Figure 3: The Policy Context for the WLWP

5.2 To be found sound the new WLWP needs to be in general conformity with the London Plan and consistent with national policy. The WLWP is also aligned with the policies of the adopted Local Plans of the WLLPAs. The WLWP may update relevant aspects of the Development Plan and where any conflict between policies exists, the policy to have been adopted most recently generally takes precedence in decision making. Once adopted, the policies in this version of the WLWP will supersede the policies in the WLWP (2015). Appendix 4 sets out how the WLWP (2015) policies are replaced by those set out in this version of the WLWP.

5.3 Once adopted this version of the WLWP forms part of the statutory Development Plan for the WLLPAs, to guide decision-making on planning applications in relation to waste related developments. The WLWP is in

accordance with national policy by applying a presumption in favour of sustainable development. The Planning and Compulsory Purchase Act 2004 requires that "... for the purpose of making any determination under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise".

5.4 The Development Plan is to be read as a whole. Most adopted plans within a local planning authority's Development Plan, such as a Local Plan, are likely to have policies that are also relevant to applications for waste related development. Each LPA may also have adopted Supplementary Planning Documents (SPDs) which may be relevant. Furthermore, applications will also be decided according to the policies in the London Plan, which also forms part of the Development Plan. Therefore, when proposing waste related development, adopted Local Plans, the extant London Plan and, if relevant SPDs, should also be consulted.

National Policy

5.5 The key objective of national policy for waste[6] is to protect the environment and human health by:

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

[6] See T*he Waste (England and Wales) Regulations 2011* and *The Waste (Circular Economy) (Amendment) Regulations 2020*

5.6 The National Planning Policy for Waste 2014 (NPPW)[7], associated Planning Practice Guidance[8] and the Resources and Waste Strategy for England 2018 (RWS)[9] currently set the national policy context for waste planning in England. Whilst the NPPF does not contain policies specific to waste, its principles remain relevant. The Waste Management Plan for England[10] signposts policies concerning waste management in England.

5.7 The 'Waste Hierarchy' is one of the keystone principles of sustainable waste management and is enshrined into English Law. This categorises different methods of managing waste and ranks them in order of preference. This is illustrated in Figure 4 below. This shows that 'Prevention' is the most preferred option with 'Disposal' at the bottom being the option of last resort. Application of the Waste Hierarchy in priority order i.e. from the top down is a legal requirement[11].

[7] National Planning Policy for Waste 2014

[8] https://www.gov.uk/guidance/waste

[9] https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england

[10] https://www.gov.uk/government/publications/waste-management-plan-for-england-2021

[11] Part 6 of *the Waste (England and Wales) Regulations 2011* sets out the duties placed on all planning authorities with regard to application of the hierarchy in decision making.

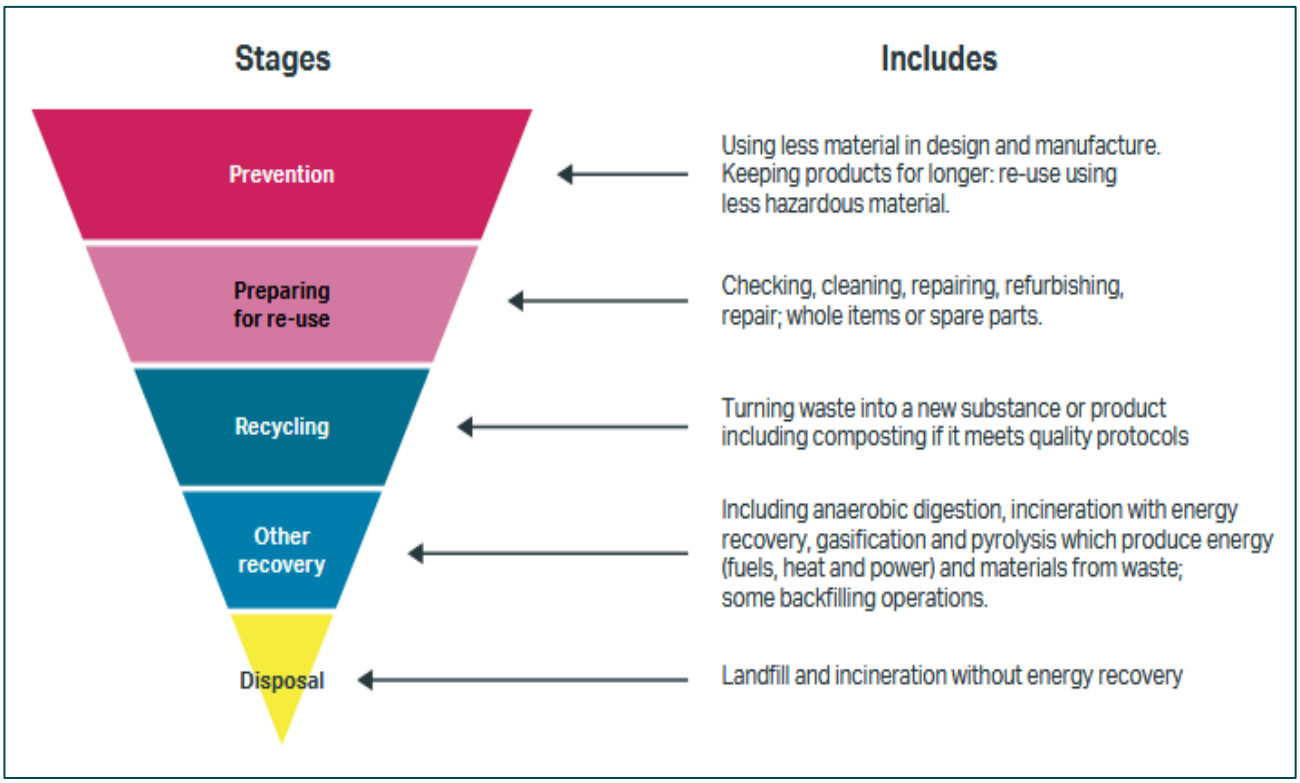


Figure 4: The Waste Hierarchy,

Graphic from the Mayor's Environment Strategy (Figure 44)

5.8 The RWS was published in December 2018 and set out Government thinking on waste management in England at that time. This included five strategic ambitions:

- To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025
- To work towards eliminating food waste to landfill by 2030
- To eliminate avoidable plastic waste by the end of 2042
- To double resource productivity by 2050
- To eliminate avoidable waste of all kinds by 2050.

5.9 The RWS introduced the concept of Circular Economy into waste management policy for the first time. The London Plan 2021 defines Circular Economy as "..where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste." (Para 9.7.1).

The central role waste management plays in the material cycle as part of more circular economy is illustrated in Figure 5 below.

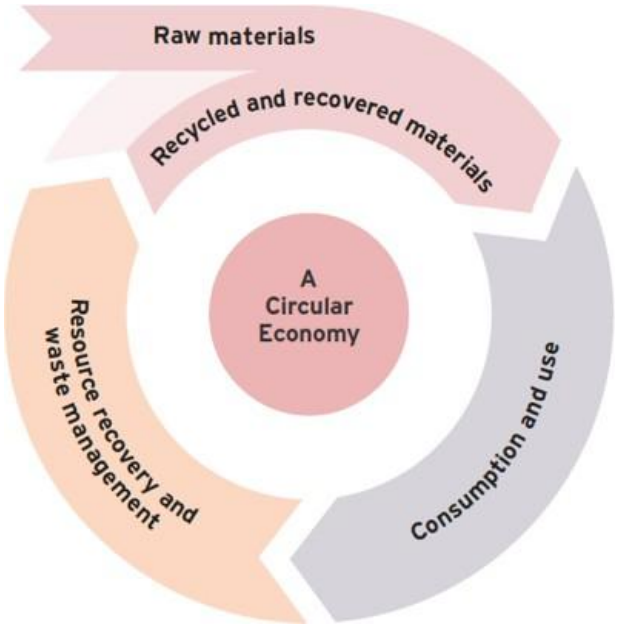


Figure 5: Circular Economy,

Source: Resources and Waste Strategy, DEFRA, 2018

5.10 The Circular Economy is also a tool for tackling the climate emergency. When applied to the built environment, circular economy principles significantly reduce greenhouse gas emissions by avoiding extraction of raw materials, reducing production of virgin construction materials, retaining embodied carbon and eliminating waste. The Government established a Circular Economy Task Force in 2024, and is expected to consult on five sector-specific roadmaps in 2026. Each roadmap is expected to include specific actions, timelines and policy recommendations to drive circularity within each target sector – textiles, transport, construction, agri-food and chemicals & plastics.

5.11 The Government set the following targets in the Environmental Improvement Plan 2023[12] (EIP), which builds on existing recycling and landfill diversion targets:

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

5.12 The target for the reduction in residual waste is enshrined in The Environmental Targets (Residual Waste) (England) Regulations 2023[13] which came into force on 30 January 2023. The waste target is for the reduction of residual waste (excluding major mineral wastes) on a kg per capita[14] basis by 50% by 2042 from 2019 levels (574 kg per capita). Accordingly, the residual waste long-term target is that by the end of 31 December 2042 the total mass of residual waste for the calendar year 2042 does not exceed 287 kg per capita. Management routes which count as residual are:

- sent to landfill in the United Kingdom
- put through incineration in the United Kingdom
- used in energy recovery in the United Kingdom
- sent outside the United Kingdom for energy recovery

12 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1168372/environmental-improvement-plan-2023.pdf

13 *The Environmental Targets (Residual Waste) (England) Regulations 2023* https://www.legislation.gov.uk/en/uksi/2023/92/made

14 Per head of population in England

5.13 The EIP also set the following interim targets for the residual waste target to be achieved by 31 January 2028 (deferred to December 2030 in EIP update published December 2025):

- Reduce residual waste (excluding major mineral waste) produced per person by 24%.
- Reduce residual waste (excluding major mineral waste) in total tonnes by 21%.
- Reduce municipal residual waste produced per person by 29%.

In addition, the following material specific targets were set:

- Reduce residual municipal food waste produced per person by 50%.
- Reduce residual municipal plastic waste produced per person by 45%.
- Reduce residual municipal paper and card waste produced per person by 26%.
- Reduce residual municipal metal waste produced per person by 42%.
- Reduce residual municipal glass waste produced per person by 48%.

5.14 In July 2023 the Government published a national waste prevention plan entitled 'Waste prevention programme for England:Maximising Resources, Minimising Waste'[15]. This document sets out how strategic principle 2 of the Resources and Waste Strategy – to prevent waste from occurring in the first place and manage it better when it does – is to be achieved.

5.15 This Plan also notes that:

- the Government intends to prepare a 'Waste Sector Decarbonisation Plan' that will set out how the waste sector will contribute to the targets in the 6th Carbon Budget (see below)

[15] https://www.gov.uk/government/publications/waste-prevention-programme-for-england-maximising-resources-minimising-waste

- the National Model Design Code published[16] in 2021 provides tools and guidance for developers to embed circular economy principles in all new development including waste management facilities
- NPPW expects planning authorities to ensure that new development includes proposals for handling waste arising from the construction and operation maximises reuse and recovery opportunities, and minimises off-site disposal
- the NPPF recognises the need for the planning system to consider the prudent use of natural resources and waste minimisation in the pursuit of sustainable development.

5.16 In addition to the above, in 2024, the Government announced its ambition for the country to achieve a zero waste economy by 2050.

5.17 In December 2024, the Government published a Residual waste infrastructure capacity note indicating that, following the implementation of policies mentioned above, there would be sufficient residual waste infrastructure capacity to treat forecast municipal residual waste arisings in London. However, it did identify a possible capacity shortfall in London when all residual waste was considered, were all such waste suitable for diversion from landfill[17].

Climate change

5.18 The Climate Change Topic Paper[18] accompanying this Plan summarises how waste planning and management can mitigate climate change by reducing greenhouse gas emissions, and adapt to its likely impacts.

[16] http://www.gov.uk/government/publications/national-modeldesign-code To be replaced by the Design and Placemaking Planning Practice Guidance.

[17] It found that for London while 2.86 Mt of EfW capacity will be available, and the total quantity of residual LACW is 2.46Mt ie a 0.4Mt surplus, an additional 1.84Mt of residual municipal waste might require diversion, suggesting a possible capacity shortfall of 1.44Mt. https://www.gov.uk/government/publications/residual-waste-infrastructure-capacity-note/residual-waste-infrastructure-capacity-note

[18] WLWP *Climate Change Topic Paper* BPP Consulting October 2025

5.19 In general, application of the waste hierarchy in priority order (and driving waste management as far up the hierarchy as possible) will reduce greenhouse gas emissions. This is reinforced by the application of life cycle assessment and circular economy approaches, which ensure that the environmental benefits of waste prevention, reuse, recycling, and other recovery are maximised.

5.20 Diverting biodegradable waste from landfill reduces methane emissions, while diverting non-biogenic waste from inefficient incineration can avoid emissions by capturing its calorific value in more sustainable ways. Recycling generally offers greater avoided emissions than burning waste to recover energy, because it exploits the material value of both biogenic and non-biogenic waste, substituting for virgin materials and their associated carbon burden. Reuse extends the lifespan of products and reduces the need for replacement production, avoiding emissions that would otherwise be generated from both manufacturing and raw material extraction. Waste prevention avoids creating waste in the first place, for example, replacing products with services, although the carbon benefits of such measures can depend on renewable energy sources being used in service delivery.

5.21 Maximising carbon reduction benefits requires applying the hierarchy from the top down, rather than progressing from the bottom step by step. The scale of benefit varies according to the material involved (biogenic vs non-biogenic), the use to which it is put (for example, anaerobic digestion of organic waste producing biogas for heating or transport compared with composting for soil conditioning, or glass going back to remelt rather than aggregate production), and the transport requirements associated with different management methods.

5.22 Beyond the hierarchy, general mitigation measures include improving energy efficiency and increasing the supply and use of renewable and low-carbon energy and heat. Development should identify opportunities to source energy from decentralised systems and facilitate co-location of

potential heat customers and suppliers, for example by linking waste management facilities with district heating networks.

5.23 Adaptation measures involve planning development in ways that avoid increasing vulnerability to climate change impacts. Where new development occurs in areas that are already vulnerable, risks must be managed through appropriate adaptation measures to ensure facilities remain resilient and effective in the long term.

5.24 Waste planning also has a direct influence over provision of management facilities available for waste. The spatial distribution of facilities is particularly important. From a mitigation perspective, spatial strategy can reduce emissions by locating facilities closer to major sources of waste, reducing the need for road transport, and encouraging use of rail or water freight. It can also promote co-location of waste operations that share energy or resources, and create synergies with other types of development, such as supplying heat and power to nearby commercial or residential development. From an adaptation perspective, spatial planning can guide waste development away from areas of existing or future vulnerability to flooding, water resource stress, water quality issues, coastal erosion, and land instability, consistent with the sequential approach set out in national planning guidance.

5.25 Development type, design, layout and operation are further areas where planning policy can exert influence. In terms of mitigation, this includes promoting the waste hierarchy by minimising landfill, maximising recycling, and enabling development of the lowest-carbon waste management solutions. Built facilities should be designed for energy efficiency, utilise renewable and low-carbon energy sources (including those generated on site), and connect to local energy networks where possible. Waste management facilities can also support wider decarbonisation by providing electric vehicle charging infrastructure or generating biogas for vehicles or injection into the gas grid.

5.26 In terms of adaptation, the design and operation of facilities can mitigate risks associated with climate change. This may involve incorporating flood resistance and resilience measures such as raised floor levels, protected utilities, and appropriate site layouts. Processes should be enclosed to reduce odour, dust, and litter, ensuring healthy conditions for staff in extreme weather. Water efficiency measures, including process water recycling and rainwater harvesting for on-site dust suppression, should be adopted, supported by sustainable drainage systems or other water storage solutions to manage runoff. Finally, planning conditions can require the implementation of dust, flood, and emergency management plans to ensure operational resilience under changing climate conditions.

The Proximity Principle and Net Self Sufficiency

5.27 The proximity principle is set out in paragraph 4 of Part 1 of Schedule 1 to the Waste (England and Wales) Regulations 2011. This is within the context of the requirement for mixed municipal waste collected from private households to be disposed of, or recovered, in one of the nearest appropriate installations, by means of the most appropriate methods and technologies, in order to ensure a high level of protection for the environment and public health.

5.28 This is to be achieved by establishing an integrated and adequate network of installations for disposal and recovery of mixed municipal waste collected from private households. The requirement also extends to where the collection includes similar types of waste collected from non-household sources (e.g. waste from offices and retail).

5.29 The network of installations is to be designed in such a way as to enable movement towards the aim of self-sufficiency in the disposal and recovery of waste at a national level, while giving consideration to geographical circumstances and or the need for specialised installations for certain types of waste.

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

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

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

5.32 When planning for waste, the NPPW expects WPAs to assess whether the unmet needs of other areas could be met within their respective areas.

Regional Policy – The London Plan

5.33 This WLWP needs to be in general conformity with the London Plan to be found sound. Hence this section presents a summary of the key requirements of the current adopted London Plan (2021) this Plan needs to address.

5.34 The administrative geography of London is overseen at a regional level by the Greater London Authority (GLA). There are thirty-three administrative areas within London: twelve inner boroughs, twenty outer boroughs, and the City of London. There are no inner-city boroughs within the WLWP area.

5.35 The London Plan provides strategic planning policy for the whole of London and sets out how certain matters, including waste, should be addressed in Local Plans including waste local plans.

5.36 The London Plan states that London should manage as much of its waste within its boundaries as practicable, aiming to achieve waste net self-sufficiency by 2026 in all waste streams except for excavation waste. To meet this aim, the London Plan 2021 forecasts arisings of Local Authority Collected Waste (referred to as household waste) plus Commercial and Industrial waste (C&I waste) for London by borough to 2041, collectively referred to as household, industrial and commercial waste (HIC). These forecasts are used as a basis to apportion quantities of this waste for management to each borough ('the borough apportionments') so that the overall goal of managing the equivalent of 100 per cent of London's waste within London i.e. net self-sufficiency by 2026 (Policy SI 8) is achieved. Excavation waste is excluded from the London Plan net self-sufficiency target as it is difficult to recycle and it is more difficult for London to provide sites for management or beneficial use. Hence provision for its management has been considered separately in this Plan.

5.37 The borough apportionments were derived by the GLA through an assessment process that included assessment of existing capacity in each borough along with a number of other factors that are considered to determine the ability of a particular borough to accommodate additional management capacity. The quantities arrived at are referred to as the London Plan apportionments (LP apportionments for short). The types of capacity considered to count towards the management of apportioned waste (hereinafter referred to as qualifying capacity) is defined in paragraph 9.8.4 of the London Plan as follows:

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

5.38 The London Plan forecasts of arisings and apportionments of HIC waste for the west London Boroughs to which this Plan relates are set out in Table 1 below. There are no separate forecasts or apportionments for the area falling under the jurisdiction of the OPDC – although Mayoral Development Corporations such as OPDC are to cooperate with host boroughs to meet identified waste needs in line with London Plan policy.

Table 1: London Plan Forecast HIC Waste Arisings & Apportionments for the West London Boroughs (tonnes per annum)

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

5.39 The apportionments for west London are significantly higher than the Plan area's projected arisings which demonstrates how west London is expected to make a significant contribution towards achievement of the London Plan's objective of achieving net self-sufficiency for London as a whole by 2026.

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

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

5.41 In addition, in connection with hazardous waste management capacity, paragraph 9.8.18 of the London Plan identifies '…a need to continue to identify hazardous waste capacity for London.' within the context of identifying sites for regionally significant facilities working with neighbouring authorities. These neighbouring authorities could either be within London, or located beyond its boundaries. Given national policy does not include an expectation for Plan areas to achieve net self sufficiency for the management of hazardous waste, due to its diverse nature and the need for regionally significant facilities to have an extensive catchment to capture a critical mass of waste, it is taken that the London Plan allows for this as well. Capacity provision is assured through engagement with WPAs outside London hosting facilities that receive strategically significant amounts of hazardous waste from west London, identified in the evidence base report[19].

5.42 The London Plan requires local Development Plans to allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste…"

[19] *Identification of Strategically Significant Cross Boundary Waste Movements from West London*, BPP Consulting, October 2025 and/or any subsequent update

(Policy SI 8 Criterion B 3). This is in line with the NPPW which requires waste planning authorities to identify sites and or areas for new or enhanced waste management facilities. The London Plan identifies existing waste sites, Strategic Industrial Locations, Locally Significant Industrial Sites and safeguarded wharves as suitable for new waste facilities. As stated previously, it also requires Mayoral Development Corporations such as the OPDC, to cooperate with boroughs to meet identified waste needs.

5.43 The London Plan seeks to safeguard existing waste sites and retain them in waste use. Paragraph 9.9.1 of the London Plan defines existing waste sites as "…land with planning permission for waste use or a permit from the Environment Agency for a waste use." The London Plan requires compensatory capacity to be provided in London if an existing waste site is to be redeveloped for a non waste use. Compensatory capacity must be at or above the same level of the waste hierarchy of that which is lost, and any loss of hazardous waste treatment or disposal capacity must be replaced on a like for like basis. Existing waste sites may be released without re-providing capacity if it can be demonstrated that there is sufficient capacity elsewhere in London to meet the apportionment and achieving net self-sufficiency, where it applies, is not compromised[20].

5.44 The London Plan supporting text indicates that boroughs with surplus capacity should offer to share this with boroughs facing a shortfall before considering release of sites from safeguarding protection. The London Plan also acknowledges that it may not always be possible for boroughs to provide for their apportionment within their boundaries and in these circumstances boroughs should seek to agree the transfer of the unmet apportionment.

5.45 Furthermore, the London Plan includes policy SI 8, Waste capacity and net waste self sufficiency, that sets criteria that development proposals for

[20] Net self sufficiency for London is not applied to the management of excavation waste or hazardous waste.

additional waste management capacity are expected to address, plus wider considerations such as job creation and social value, local need and accessibility of services to local communities and businesses.

5.46 A review of the London Plan 2021 has commenced. The consultation, Towards a new London Plan (May 2025), recognises future changes could require an evolving approach to waste policy in London, recognising the land pressures that continue to threaten the loss of existing waste sites, reducing London's capacity to process its own waste. It states the new London Plan will address these challenges by updating borough-level waste apportionments, ensuring they align with the latest data and policy reforms. This WLWP has been prepared to be in general conformity with the London Plan 2021. The Plan making bodies will continue to monitor work on the emerging new London Plan and continue to engage with the GLA accordingly.

London Environment Strategy (May 2018)

5.47 The London Environment Strategy sets out the Mayor of London's vision for improving London's environment. It covers a wide range of issues including air quality, green infrastructure, climate change mitigation and transitioning to a low carbon circular economy alongside waste specific policies and targets.

5.48 Policy 7.2.1 sets a target of increasing municipal waste recycling rates to achieve 65 per cent by 2030. To aid in this the Mayor expects waste authorities i.e. Waste Disposal Authorities and Waste Collection Authorities to collectively achieve a 50 per cent LACW recycling target by 2025 and aspire to achieve:

- a 45 per cent household waste recycling rate by 2025
- a 50 per cent household waste recycling rate by 2030.

5.49 Specific waste related actions include the expectation that waste authorities produce strategies setting out how their waste activities will:

- help move waste up the waste hierarchy to ensure a greater focus on reduction, reuse and recycling
- provide local economic, social and environmental benefits from improved waste management
- make a meaningful contribution to meeting the Mayor's targets
- make best use of local waste sites and facilities identified in local waste plans
- support the phase out of fossil fuel waste transport and boost uptake of low or zero emission alternatives.

5.50 Policy 7.3.1 is aimed at reducing emissions from transport of waste. It includes an expectation that waste authorities demonstrate how they will transition their waste fleets to low or zero emission options, prioritising the phasing out of diesel. Waste authority waste fleets are expected to comply with the Ultra Low Emission Zone (ULEZ) vehicle exhaust emission standards and to work towards the Mayor's overall ambition for:

- all new cars and vans (less than 3.5 tonnes) being zero emission capable from 2025
- all heavy vehicles (greater than 3.5 tonnes) being fossil fuel-free from 2030
- zero emission fleets by 2050

Fossil-fuel free can include the use of 100 per cent renewable fuels derived from sources such as food waste and waste oils.

5.51 In performing their waste functions, waste authorities are expected to act in general conformity with the municipal waste provisions of the strategy. General conformity in that context only applies to activities involving local authority collected waste (LACW). The principal entity upon which the above obligations fall in west London is the West London Waste Authority, otherwise known as WLWA.

London-wide Climate Emergency

5.52 In December 2018, the London Assembly declared a climate emergency and called on the Mayor of London to do likewise and put in place specific emergency plans for London to achieve carbon neutrality by 2030. Shortly after, the Mayor declared a climate emergency and set a target for London to be net zero-carbon by 2030. All six west London boroughs have declared a climate emergency and the impact of these on this Plan is considered in detail in the accompanying Climate Change Topic Paper[21].

Local Policy

LPA Local Plans and Related Plans and Guidance

5.53 Each west London LPA has adopted its own local plan, which forms part of the statutory Development Plan and sets out the spatial strategy, objectives, and policies to guide development within its area. These plans include provisions relevant to waste development, particularly in relation to climate resilience, sustainable design, biodiversity, and infrastructure. The following summary identifies policies ,to be considered alongside the policies in this version of the WLWP following adoption, when proposals seeking planning permission for waste related development are being determined.

[21] *Climate Change Topic Paper* BPP Consulting October 2025 and/or any subsequent update

Brent

5.54 Brent's Local Plan (2019 to 2041) includes policies that require proposals to demonstrate climate resilience and connect to district heat networks unless using 100% renewable heating. Air quality, flood risk mitigation, and sustainable transport are also key considerations, with specific requirements for sustainable drainage systems (SuDS), water management, and safeguarding land for future infrastructure.

Ealing

5.55 Ealing's emerging Local Plan and adopted Core Strategy support the borough's ambition to be carbon neutral by 2030. Development proposals are expected to incorporate energy efficiency measures, renewable energy, and follow circular economy principles. Urban greening standards are set in line with the London Plan, and major development schemes must demonstrate net-zero operational energy and reduced embodied carbon.

Harrow

5.56 Harrow's adopted Local Plan responds to declared climate and ecological emergencies. All new development must be net-zero carbon and incorporate sustainable design, energy efficiency, and water conservation. Flood risk policies require elevated floor levels and SuDS, while waste and transport policies promote recycling and reuse. Developments must support heat network connections and provide electric vehicle charging infrastructure.

Hillingdon

5.57 Hillingdon's Local Plan expects all developments to be designed to make the most efficient use of natural resources and include sustainable design and construction techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill. More broadly, policies support renewable energy generation, sustainable land re-mediation, and comprehensive water

management. SuDS are required unless demonstrated to be unviable, where financial contributions will be sought, and biodiversity enhancements such as green roofs and living walls are promoted. Developments within proximity to heat networks must connect unless exempted.

Hounslow

5.58 Hounslow's adopted and emerging Local Plans set out requirements for net-zero carbon development, energy efficiency, and integration with district heat networks. Sustainable design features, including SuDS and urban greening, are expected in major schemes. Air quality assessments and mitigation measures are required, and waste management must be addressed in consultation with relevant services.

Richmond upon Thames

5.59 Richmond's adopted and emerging Local Plans require developments to reduce carbon emissions. Circular economy principles are embedded, with emphasis on reuse and sustainable construction. Energy strategies must be submitted, and developments are expected to connect to decentralised energy networks. Flood resilience measures, water infrastructure capacity, and urban greening are key considerations for all proposals.

Old Oak and Park Royal Development Corporation (OPDC)

5.60 The Old Oak & Park Royal Development Corporation (OPDC) is a Mayoral Development Corporation, which covers parts of three London Boroughs including Brent and Ealing (see Figure 1). The OPDC is the local planning authority for its area but does not have responsibility as a waste collection or waste disposal authority for its area. OPDC also does not have a separate HIC waste apportionment in the London Plan. As a Mayoral Development Corporation, OPDC is expected to cooperate with host boroughs to meet identified waste needs (Policy SI 8 of the London Plan) and is a joint partner alongside the six other local planning authorities

working together to develop this Plan. Only the parts of the OPDC area that fall within Brent and Ealing are covered by this WLWP.

5.61 The OPDC Local Plan (2018 to 2038) forms part of the Development Plan for parts of the London Boroughs of Brent, Ealing and Hammersmith and Fulham. Alongside the WLWP, it demonstrates how OPDC is helping the three host boroughs to meet their waste needs. It supports integrated development aligned with strategic housing and employment targets. Policies require carbon emission to meet or exceed London Plan standards, with financial contributions where on-site reductions are not achievable. Water management, urban greening and biodiversity enhancement, waste hierarchy and circular economy principles as well as consideration of air quality, noise, vibration are integral to the design and delivery of development proposals.

West London Waste Authority

5.62 The West London Waste Authority (WLWA) otherwise known as West London Waste[22], is a statutory joint waste disposal authority (WDA) with responsibility for the management of household and commercial waste collected by or on behalf of the west London Boroughs, serving approximately 1.7 million residents across 38,000 hectares. WLWA also operates a public Reuse and Recycling Centre at Twyford. WLWA is a resource transformation body and has a dedicated Circular Economy team to drive innovation, so materials are kept in use for longer through reuse, repair, remanufacture, and recycling.

5.63 WLWA has entered into a 25 year Residual Waste Services Contract with West London Energy Recovery Ltd operated by Suez, for the management of over 300,000 tpa of residual LACW produced in west London that runs to 2041. This relies extensively on the export by rail of residual LACW by rail from two existing waste sites with railheads, Transport Avenue

[22] https://westlondonwaste.gov.uk/

(Hounslow) and Victoria Road (Hillingdon) following processing into RDF for EfW outside London. As a result, the quantity of west London LACW sends to landfill has reduced to virtually nil.

5.64 As stated previously, in 2019 all six west London boroughs declared a climate emergency and committed to achieving net zero emissions by 2030. WLWA has adopted the same target and is working in partnership with the boroughs to support broader sustainability goals beyond waste management.

Chapter 6: Vision and Objectives

The Vision

6.1 The Vision below describes how waste will be managed in west London looking ahead over the next 15 years.

West London Waste Plan Vision

To contribute to the ambition of being net zero by 2030 across west London, land to be used for waste management over the next 15 years will focus on the efficient and flexible use of safeguarded waste sites, railheads and wharves for waste. This will allow waste materials to be managed as a valuable resource, keeping them in circulation through innovative re-use, repair, and high-quality recycling for as long as possible in line with circular economy principles.

A zero-waste to disposal approach will exist whereby any waste produced in west London is managed applying the waste hierarchy in priority order, with residual waste being minimised, and maximum value recovered from any remaining unavoidable residual waste through high efficiency low-carbon recovery facilities if needed.

The network of management facilities across west London will continue to ensure that at least an equivalent amount of waste produced within west London is managed within it, plus a contribution is made to achieving net self-sufficiency for London as a whole, as necessary. There will be sufficient flexibility to manage waste from outside the Plan area where this represents a sustainable option that supports circular economy goals. This, together with sustainable transport options, will minimise adverse impacts on road networks and local air quality.

Through partnerships between local authorities, businesses, and local communities, west London will have established a network of Circular Economy Hubs, that foster innovation in waste prevention, material exchange and reuse, and repair. These hubs will help drive green business growth, sustainable entrepreneurship, and job

creation, ensuring the transition to a low-carbon circular economy continues strengthening local prosperity, material security and skills development through education and community engagement.

Carbon emissions from west London's waste management system will have been virtually eliminated through:

- electrification of operations using renewable and other clean or zero carbon energy sources
- use of sustainable waste transport and low-emission collection services
- minimisation of greenhouse gas emissions that may arise from specific types of waste management facilities

All waste infrastructure will be resilient to climate change, meet all relevant environmental standards as a minimum and meet evolving operational needs.

Strategic Objectives

6.2 The 'Strategic Objectives' set out what needs to be done to realise the vision.

West London Waste Plan Strategic Objectives

Strategic Objective 1: Make best use of existing waste infrastructure to manage waste efficiently

Safeguard existing waste sites across west London to retain sufficient capacity to manage at least the equivalent tonnage of waste arising in west London plus an amount from elsewhere in London, if needed.

Encourage development of operations at existing waste sites to improve efficiency, throughput and quality of outputs through innovation, automation, and proximity to material and energy users.

Encourage appropriate co-location of waste uses with other industrial uses to promote circular economy solutions as part of a west London wide network.

Safeguard capacity, capability and future potential of existing waste management facilities from being compromised by incompatible proximate development such as housing, including by implementing the Agent of Change principle when applications for development are being considered.

Strategic Objective 2: Encourage facilities that contribute to the achievement of a Circular Economy to come forward

Support local Circular Economy Hubs that facilitate material exchange, re-use and remanufacturing. This may comprise a network of local facilities combined with larger-scale infrastructure that may be outside a waste use.

Provide for waste management capacity that supports production of high-quality material from waste suitable for direct utilisation by material users.

Strategic Objective 3: Decarbonise Waste Transport and Processing

Utilise and expand sustainable transport options for waste movement, including rail and water freight, to reduce road-miles, by safeguarding railheads and wharves in waste use.

Require waste management facilities to integrate low-carbon technologies.

Require waste-to-energy development to be integrated with local energy supply networks from day 1 of their operation, and maximise re-use of any residues produced.

Strategic Objective 4: Deliver high quality waste facilities (protect and enhance the environment and communities)

Ensure all waste infrastructure development implements best practice for protection of the environment and local amenity.

Minimise unacceptable adverse impacts of waste management operations.

Require that waste development contributes to local employment and sustainability objectives.

Strategic Objective 5: Ensure sufficient capacity of the right type in the right place so that unavoidable residual waste produced is managed safely and effectively.

Only consent facilities for the management of residual waste where it is shown that the waste to be managed is unavoidable.

Ensure that such facilities operate to best practice with minimal adverse impact to the locality and the environment as a whole, including greenhouse gas emissions.

Chapter 7: Future Requirements for Waste Management Capacity

7.1 In order to establish how much waste management capacity is needed over the Plan period a study[23] was undertaken that considered amongst other matters how the requirements of the London Plan could be met. In response to the Regulation 18 consultation, a number of representations were received relating to the inclusion or otherwise of particular sites in Appendix 2, and the tonnages attributed to these. As a result, and after careful consideration the WLLPAs have determined that in some cases the tonnages set out should be revised. The values relating to surplus capacity set out below reflect these changes. Site-specific updated values are shown in Appendix 2 against the relevant entry.

Management Capacity for Apportioned HIC[24] Waste

7.2 It is estimated that current qualifying waste management capacity in west London is capable of managing c.2.60 million tpa of HIC waste. This is more than sufficient to manage the London Plan apportioned forecast arisings in 2041. Table **2** below shows that the surplus capacity for the management of apportioned waste at 2041 is estimated to be c0.36 Mtpa.

Table 2: Combined apportionment for West London Boroughs compared to Estimated Apportionment Capacity in West London (after release of sites)

Apportionments and capacity	**Baseline**	**2041 Forecast**
Apportionment (London Plan 2021)	2,092,000	2,221,000
Assessed Capacity (2026)	2,597,357	2,578,711
Difference	+505,357	+357,711

[23] *Assessment of Existing Waste Management Capacity,* BPP Consulting, October 2025 and/or any subsequent update

[24] Household Waste plus Commercial & Industrial Waste

Management Capacity for C, D & E Waste

7.3 An estimate of 3.3 Mtpa was derived for C, D & E waste arising in 2023 rising to 3.5Mtpa in 2041. Comparing this to an estimate of existing C, D & E waste management capacity to be safeguarded of c3.9Mtpa reveals a capacity surplus of approximately 0.37Mtpa in 2041 (after site release deductions). However, given C & D waste is dealt with separately to excavation waste in the London Plan, each has been considered separately.

7.4 When C&D waste is considered alone, the arisings value is 1.13Mt in 2023 rising to 1.34 Mt in 2041. This compares with assessed capacity of 2.41 Mtpa in 2023 reducing to 2.13 Mtpa in 2041 (after site release), giving a capacity surplus of 1.28 Mtpa in 2023 and 0.79 Mtpa in 2041 respectively. As excavation waste is not subject to the expectation of net self-sufficiency, capacity adequacy has not been assessed in the same way, although a number of facilities where this waste is managed, do exist and are included in the safeguarded waste site listing in Appendix 2 of this Plan.

Management Capacity for Hazardous Waste

7.5 A forecast for hazardous waste arisings to 2041 indicates that 50,900 tpa may be produced in 2041. This compares to existing hazardous waste management capacity of c.129,400tpa which indicates a capacity surplus of approximately 78,500tpa in 2041.

Requirements for Landfill

7.6 Non-hazardous residual waste will continue to be diverted from landfill due to the landfill tax escalator and other initiatives, slowing the depletion of available void space in existing sites. This helps to preserve remaining landfill capacity. In the absence of any non-hazardous landfill capacity within the Plan area, the anticipated demand for non-inert landfill capacity from West London could be met by landfills outside the Plan area.

7.7 Monitoring of landfill availability, and ongoing liaison with relevant WPAs will help ensure sufficient capacity is planned for while the Plan's focus remains on reducing the area's non-hazardous landfill requirement to an absolute minimum in line with the national residual waste reduction target. Policy WLWP 5 does however provide for the possible development of such capacity within west London where exceptional circumstances are shown to prevail.

Providing for Unmet Needs from Elsewhere within London

7.8 The London Plan[25] expects London boroughs to offer to share any surplus capacity with other London boroughs that may be facing a shortfall in capacity to meet their apportionments before considering release of existing sites from waste use. In light of the identified surplus of apportioned HIC waste management capacity, the LPAs have engaged with London boroughs that have identified unmet needs and intend to continue to do so. It should be noted that the dataset for 2023 shows significant tonnages of waste that arise from outside the WLWP area are managed at facilities located within the WLWP area (hence the achievement of net self-sufficiency and existence of the identified capacity surplus)[26].

7.9 Any agreements on sharing capacity will be formalised through an appropriate mechanism which may include a Statement of Common Ground (or similar) to which all the LPAs party to this WLWP, and the Plan making entity seeking to share in west London surplus capacity will be signatories. Such agreements would cover a specified period (which may be less than the period of this Plan) and be subject to review and renegotiation, including as part of future reviews of this version of the WLWP in light of adoption of the new London Plan. Any such agreements will be reported in the WLLPAs' Authority Monitoring Reports (AMR).

[25] Paragraph 9.8.6, London Plan 2021

[26] See '*Identification of Strategically Significant Cross Boundary Waste Movements from West London'*, BPP Consulting, October 2025

Future Waste Management Capacity in West London

7.10 Given there is sufficient capacity in west London to meet the management requirements for all three principal waste streams throughout the Plan period, this Plan:

- does not propose to allocate specific areas of land for the development of additional waste management facilities, and therefore the previous sites allocated in the 2015 WLWP are released
- safeguards existing waste management sites where such safeguarding protection does not hinder the wider development aims of the host LPAs as set out in adopted Local Plans.

7.11 The list of sites to be safeguarded through this WLWP is included in Appendix 2, with maps of each boundary included in Appendix 3. The safeguarding policy is Policy WLWP 1. WLWP 1 also sets out the circumstances when proposals for additional waste management capacity might be acceptable.

7.12 Existing waste sites that fall within areas identified for redevelopment in LPA Local Plans for non-waste uses are listed in Appendix 6. The loss of the capacity offered by these sites is considered in a separate report[27] and has been factored into the assessment of existing waste management capacity, set out above, and surpluses for the management of HIC waste and C&D waste that remain.

7.13 Available capacity will be monitored over the Plan period, taking account of any agreements reached with other boroughs and will be reported periodically.

[27] *Safeguarded Sites for Release in West London – Assessment Report*, BPP Consulting, October 2025 and/or any subsequent update.

Chapter 8: Proposed Policies

8.1 The following section sets out the policies to be used when determining applications for planning consent for waste related development in west London. The relevant policies set out below will be applied alongside any relevant policies in other documents that form part of the Development Plan.

8.2 The proposed policies are summarised below:

Policy WLWP 1:Safeguarding and Optimising the Waste Site Network.

Keystone policy to make the most of existing network of suitable sites.

Policy WLWP 2: Provision of Additional Waste Management Capacity.

Policy making provision for compensatory and windfall capacity.

Policy WLWP 3: Residual Waste Management and Energy Recovery.

Policy defining specific conditions under which capacity for the management of residual waste may be supported.

Policy WLWP 4: Ensuring High Quality and Resilient Waste Facilities.

Policy setting out waste specific requirements/standards that facilities need to meet.

Policy WLWP 5: Recovery and Disposal of Waste to Land.

Policy defining specific conditions under which proposals for:

- non-inert landfill
- placement of inert waste
- excavation/mining of existing landfills may be consented

Policy WLWP 6: Circular Economy and Resource Efficiency.

Policy setting out the requirements for proposed waste related development to support the Circular Economy and ensure the land, facilities and infrastructure necessary to deliver waste related Circular Economy & Resource Efficiency proposals that come forward.

Policy WLWP 7: Wastewater Treatment Infrastructure

Policy setting out requirements for applications seeking to expand wastewater treatment infrastructure and associated safeguarding requirements.

8.3 Each of the proposed policies are set out in detail below.

Policy WLWP 1 – Safeguarding and Optimising the Waste Site Network

Policy Purpose:

Protecting, enhancing and optimising the existing network of waste sites so that sufficient suitable waste management capacity is provided for the Plan period as follows as a minimum:

1. the apportionments for Household and Commercial & Industrial (HIC) waste for 2041 set out in the London Plan 2021 continue to be met (noting that the London Plan is currently undergoing review); and
2. the equivalent amount of C, D & E waste forecast to arise in west London continues to be managed within the Plan area (with the exception of excavation waste); and
3. for hazardous waste, capacity that would meet a need for west London or London as a whole, if the need for the capacity to be located within west London is demonstrated;

and allowing for the reprovision of capacity at suitable locations within west London, where needed.

8.4 The London Plan 2021 Policy SI 9 sets out that existing waste sites should be safeguarded and retained in waste management use. The purpose of safeguarding existing waste management sites is to ensure sufficient capacity is maintained in west London so that the objectives and targets for waste management set out in this Plan are met throughout the Plan period.

8.5 The London Plan 2021 allows for the redevelopment of existing waste sites for non-waste uses providing an equivalent amount of replacement (or compensatory) capacity is provided. There is also a provision in the London Plan that allows for site release without replacement capacity being provided where it is demonstrated there is already sufficient capacity to allow the London Plan apportionments to be met and the capacity that would be lost is not required to ensure net self-sufficiency is

met. This is based on capacity increases at waste sites being implemented over the Plan period[28], which in turn is based on the assumption that the capacity provided by existing waste sites across London is insufficient to meet the London Plan objectives and apportionments.

8.6 Where compensatory capacity is required, the London Plan 2021 states that the quantum should be based on the peak recorded input to the site in question over the most recent five years for which data is available. If such data is unavailable, an appropriate assessment of potential capacity may need to be made. The Environment Agency's Waste Data Interrogator dataset is recommended for the identification of peak input to sites that have been operational during the five year period to which data relates.

8.7 This Plan proposes to safeguard waste management capacity based on the assessed capacity of existing waste sites, rather than solely on the five-year peak recorded input. This is in order to avoid an incremental loss of waste management capacity over the Plan period within the context of strong development pressure from competing land uses across west London.

8.8 The London Plan 2021 currently defines existing waste sites as having one or both of the following:

- sites that benefit from permanent planning permission that expressly consents the management of waste
- sites subject to an Environmental Permit that permits a waste management activity

The London Plan definition does not include sites with a waste use that has become lawful through the passage of time under planning legislation or where the waste use is ancillary to a wider lawful use. The lawful status of such sites can be confirmed by issue of a Certificate of Lawful Existing Use or Development (CLEUD). For the purposes of this

[28] London Plan 2021 paragraph 9.9.3

Plan, existing waste sites are defined as land that meet at least one of the following conditions:

- is subject to an extant planning consent for waste use
- where a Certificate of Lawful Existing Use or Development (CLEUD) for a waste use has been granted
- is used for a waste use that has become lawful through the passage of time under planning legislation
- where the waste use is ancillary to a wider lawful use

8.9 Such sites may also benefit from an Environmental Permit issued by the Environment Agency for waste-related operations, but such a permit's existence is not considered determinative on the matter of safeguarding as that is properly a land-use planning rather than pollution control matter. Therefore, sites that are only subject to an Environmental Permit for waste use, and do not have a planning permission, a CLEUD, or are not otherwise considered lawful under planning legislation, are not included within this definition. An assessment of the capacity for each safeguarded site in west London was undertaken and included in the Waste Capacity Assessment[29].

8.10 Proposals to develop a safeguarded waste site for waste uses will be supported where this contributes to the optimisation of waste management capacity of the Plan area.

8.11 Proposals to redevelop a safeguarded waste site for a non-waste use will need to demonstrate that other safeguarded waste sites already provide sufficient capacity to meet both the apportionments set by the London Plan for the Plan area, and net self-sufficiency for London as a whole over the Plan period, or that appropriate replacement capacity is secured before the change in use sought is consented.

[29] See *West London Waste Capacity Assessment*, 2025, BPP Consulting and/or any subsequent update

8.12 Where replacement capacity must be provided, this may either be through enhancing the capability of an existing safeguarded waste site or through securing a new site capable of managing at least the required amount of waste. As per Policy SI 9 of the 2021 London Plan this should be within London. In either case, provision of the additional capacity must be capable of being secured through a legal agreement.

8.13 Replacement capacity must be at least equivalent in terms of:

- the type of waste managed (HIC (LACW & C&I), C, D & E, Hazardous)
- its position on the waste hierarchy (a lower throughput for management further up the hierarchy may be acceptable).

8.14 If the current capacity qualifies as capacity for managing apportioned waste as set out in Para 9.8.4 of the London Plan (reproduced above), any replacement must also satisfy the London Plan's criteria for qualifying capacity.

8.15 There must also be no existing or proposed developments that could constrain provision of the replacement capacity, such that it might not be deliverable in practice.

8.16 LPAs will enforce provision of replacement capacity through conditions on the planning consent granted to the site to be released and legal agreements to ensure that replacement capacity must be capable of entering into operation to the level required as assessed under part F of policy WLWP 1.

8.17 Railheads and wharf capacity for waste transportation associated with a safeguarded waste site are also safeguarded for waste use, where such use does not conflict with other existing or planned uses. However, in the event that the waste site ceases to be safeguarded for waste use, the safeguarding of the associated railhead or wharf for waste transportation will also cease, while safeguarding of capacity for other uses continues to apply.

Policy WLWP 1: Safeguarding Waste Sites

A. Waste sites in west London will be safeguarded for their identified waste use unless otherwise identified for release (see Appendix 6).

B. Waste sites are those subject to planning consent or CLEUDs for a waste use, or deemed lawful in planning terms (those listed in Appendix 2 and meeting the above definition post-adoption of this Plan).

C. Sites subject to time limited consents will only be safeguarded up to the date at which the consent permitting the waste use expires.

Development of safeguarded waste sites for waste uses

D. Proposals to redevelop safeguarded waste sites for waste uses will be supported where this contributes to the optimisation of waste management capacity of the Plan area. The capacity of the redeveloped site must not be less than the assessed capacity of the existing site, as set out in Appendix 2 (or in any subsequent assessment), unless it will demonstrably result in waste being managed further up the waste hierarchy and the site is being optimised for this purpose.

E. Opportunities should be explored to co-locate waste uses together and with complementary activities[30], provided cumulative effects remain acceptable.

Release of safeguarded waste sites for non-waste uses

F. At the time of an application for re-development of a safeguarded waste site for non-waste uses, the replacement capacity requirement will be determined, with the assessed capacity of the existing site as set out in Appendix 2 (or in any subsequent assessment) being the starting point.

In certain instances, the following will also be given a degree of weight:

- the site's particular circumstances (including allocation within a Local

[30] Such as activities that make use of the outputs of associated waste management operations.

Plan for an alternative use),

- throughput capacity consented through a previous planning consent or bespoke environmental permit
- reported throughput (based on the Waste Data Interrogator or an equivalent data source), and
- wider market conditions

The replacement capacity must be at or above the same level of the waste hierarchy as the capacity it would replace.

G. Replacement capacity must be capable of entering operation to the level required prior to commencement of the development which would result in the loss of capacity. This will be secured through condition and or legal agreement if consent for the change of use for non-waste uses is granted.

Railheads and Wharves

H. Railheads and wharf capacity for waste transportation associated with a safeguarded waste site will be safeguarded for waste use where it this does not conflict with other existing or planned uses. In the event that the existing waste site ceases to be safeguarded for waste use, the safeguarding of the associated railhead or wharf for waste transport will also cease.

Neighbouring development

I. To protect the ongoing operation of safeguarded waste sites, the Agent of Change principle will be applied to development proposals so that any sensitive receptors or potentially incompatible developments in proximity to safeguarded waste sites will not constrain the waste site's current and future operation or capacity, including through incorporating appropriate mitigation as part of the design[31].

[31] See para 9.8.20 and Policy D13 of the London Plan (2021), and paragraph 200 of the NPPF (2024) and Policy P4 of the draft NPPF (2025)

Implementation

8.18 Safeguarded waste sites are those waste sites whose capacity has been counted as contributing towards meeting the above need as listed in Appendix 2, unless they have been released from safeguarding (see Appendix 6). Safeguarding extends to other sites which meet the definition post adoption of the plan. Following adoption of this Plan, updates on the list of waste sites that meet the definition will be provided in Authority Monitoring Reports produced by the LPAs.

8.19 When assessing 'wider market conditions' a holistic view should be taken of current and emerging legislation, market trends, and changing composition and volumes of waste streams. This should be demonstrated through feasibility assessment to determine whether there is sufficient ongoing demand for the existing waste use to continue at the particular location, and robustly explores all reasonable alternative waste uses. Particular regard should be given to the potential for the site to accommodate other waste related or circular economy functions, across all relevant waste streams at an equivalent or higher level of waste hierarchy. Proposals should be supported by clear evidence, including trend analysis and market data, demonstrating that such reasonable alternatives have been considered. The planning authority may seek financial reimbursement from the applicant to cover the cost of independent expert scrutiny where capacity matters require further verification.

Policy WLWP 2 – Provision of Additional Waste Management Capacity

Policy Purpose: To enable the Plan area waste network to evolve in response to emerging needs for capacity, including moving waste up the hierarchy, supporting development of the circular economy, and provision of compensatory capacity.

Need for additional capacity and waste hierarchy

8.20 Waste management capacity is taken to be the maximum amount of waste that can be managed at a site or facility (generally measured in tonnes per annum throughput, or, for permanent deposit to land e.g. landfill, may be overall volume in cubic metres) on an annual basis.

8.21 The most recent Capacity Assessment[32] demonstrates that there is sufficient existing capacity in west London for current and forecast future waste arisings within the Plan area, plus that apportioned via the London Plan to be managed appropriately. Therefore, there is no identified need for development of additional capacity within the Plan area for the Plan's objectives to be met. The capacity of sites to be safeguarded for waste use[33] exceeds that assessed to be needed over the Plan period. This provides a degree of flexibility should waste management requirements change or London Plan apportionments increase through the new London Plan.

8.22 However, there may be scope for development of additional capacity, including through intensification of existing safeguarded sites, to provide for management further up the waste hierarchy.

[32] See *West London Waste Capacity Assessment*, 2025, BPP Consulting

[33] See Appendices 2 and 3.

Location

8.23 While existing capacity in west London has been assessed to be sufficient to meet identified management needs over the Plan period, development of additional capacity, for example to move the management of waste up the waste hierarchy or to provide higher quality capacity to replace aging existing waste infrastructure is still encouraged. The London Plan (Policy SI 8 B4) identifies the following locations as being suitable for the provision of additional waste management capacity: existing waste sites, Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs), and safeguarded wharves with existing or potential for waste management. This WLWP reflects the same approach as the London Plan Policy SI 8 B4 and supports development of waste management capacity providing it is located either on existing waste sites, or on industrial land identified as suitable in LPA Local plans, where the grant of consent would be consistent with other policies of the development plan including those protecting the environment, health and amenity.

8.24 Possible impacts on the local highway network and air quality that may be caused by increased vehicle movements are often key areas of concern for local communities. Preferred locations are therefore those close to railheads and wharves that can be used for waste transport and/ or close to the strategic road network (motorways and trunk and principal roads). It is also important that the full potential of locations which allow for non-road modes of transport i.e. by rail and water, are utilised so that unnecessary movements of waste by road is eliminated.

Policy WLWP 2: Provision of Additional Waste Management Capacity

Emerging Capacity Needs

A. Proposals for additional waste management capacity will be supported in principle where they satisfy at least one of the following criteria:

1. demonstrate they would contribute towards meeting a specific need for the management of waste arising within west London
2. are for capacity which would result in target waste being managed as far up the waste hierarchy as possible
3. involve re-use, repair, and remanufacturing activities, including Circular Economy Hubs, assessed to constitute waste development.

B. Development of capacity to manage non-apportioned waste streams will be supported to sustain Plan area net self-sufficiency as follows:

<u>Construction, Demolition & Excavation (C, D & E) Waste</u>

1. Proposals for capacity that will facilitate the use of C, D & E waste, and its conversion into products suitable for use (reflecting circular economy principles) will be supported in principle.
2. On major development sites, the establishment of temporary material exchanges and C, D & E waste processing facilities during construction should be considered where this is demonstrated to not have significant adverse effects on the environment, local amenity and does not hinder timely completion of construction.

<u>Hazardous Waste</u>

3. Proposals for additional hazardous waste management capacity will be supported where they meet an identified need either within west London or within London as a whole, and would contribute towards a network of facilities that promote the safe and sustainable treatment of hazardous waste across London.

Locational Criteria

C. Proposals for waste management capacity will be supported in principle where at least one of the following criteria are met:

1. It is located within the boundaries of a safeguarded waste site;

2. It is located within industrial areas or previously developed land (PDL) with priority given to Strategic Industrial Locations (SIL) or Locally Significant Industrial Sites (LSIS) provided they do not compromise these designations and allocations in development plans for non-waste development;

3. The site is otherwise suitable for the proposed use and is consistent with the relevant development plan and its spatial strategy;

In addition the following criteria should also be met:

4. Existing transport links are adequate to serve the development, or where necessary can be improved to an appropriate standard; and

5. Where practicable and economically viable, the development makes use of sustainable modes of transport (rail or water) for the transportation of materials including waste to and from the site both during construction and operation (where waste would be moved by rail or water this might allow unmet needs from outside west London to be met); and

6. The proposal would not result in significant adverse impacts on the environment or local amenity, or unacceptable impacts on highway safety, including cumulative effects in combination with other existing or proposed development in the vicinity.

8.25 For proposals intended to manage Household Commercial & Industrial (HIC) waste, either the combined current capacity of the safeguarded waste sites (as assessed in Appendix 2 or any subsequent assessment) should be taken into account to demonstrate an identified need to meet London Plan apportionment/management targets or specific needs (such as a particular technology), hence justifying the proposed additional capacity. For other waste streams, it should be shown that the proposed

additional capacity will meet an identified need or enhance the range of waste management facilities available to serve the Plan area. For example, a specialist facility to recover a waste or material not currently separately managed in the Plan area.

8.26 Proposals will be assessed as waste-related development if the primary purpose is the management of waste, unless there is a clear case for them not to be dealt with as such; certain uses such as small-scale reuse facilities may be assessed as non-waste uses depending on the precise nature of their activity.

8.27 Temporary material exchanges, for example for materials such as timber pallets and architectural salvage, and deployment of mobile plant for crushing and screening, which serve major development sites during the construction and demolition phase, will be supported in principle.

8.28 This Plan recognises that industrial land is generally appropriate for waste uses, paying regard to any emerging pressures or planned development that might limit land supply.

8.29 The assessment of impacts shall include (but is not limited to) traffic, air quality, noise, vibration, odour, litter, visual impact, biodiversity and community safety and well-being as set out in Policy WLWP 4.

Policy WLWP 3 – Residual Waste Management & Energy Recovery

Policy Purpose: To allow for provision of additional residual waste management capacity where a need in west London is demonstrated that won't compromise the achievement of the objective of managing waste as high up the waste hierarchy as possible and the reduction in residual waste arisings.

Where proposals involve the provision of energy from waste capacity, to ensure that this is for residual waste only, that the use of energy produced is maximised and carbon emissions are minimised.

8.30 Residual waste is normally defined as waste that is left after reuse, repair and recycling has been maximised. However, it is now defined in national legislation[34] as all waste subject to final treatment, whether sent to landfill, incinerated or treated through energy recovery (including refuse derived fuel exported for energy recovery).

The term also captures within it, that amount of household waste managed through these routes, as well as waste arising from other sources of a similar nature as municipal waste plus certain wastes from other sources such as C, D & E waste. Figure 6 below illustrates how the total residual waste is made up.



Figure 6: Residual Waste

[34] The Environmental Targets (Residual Waste) (England) Regulations 2023

8.31 Given the above, the reduction of residual waste is a key objective of this WLWP. This policy is included to reflect this, restricting the provision of additional capacity to manage residual waste only to that which is proven to be unavoidable. i.e. the fraction remaining after all reasonable measures to reduce, reuse, or recycle have been applied. In such cases the capacity should be appropriately sized so as to ensure that the long term national per head target of halving residual waste by 2042 is not compromised.

8.32 The management of the combustible proportion of residual waste that arises from municipal sources in particular often involves technology that converts it to energy. Energy from Waste (EfW) generally takes the form of plants that incinerate waste and capture the heat to generate electricity. 'Surplus' heat may also be captured and utilised in heating, or cooling, of other development sometimes via the use of district heating schemes. Other forms of energy from waste such a pyrolysis and gasification are sometimes termed 'Advanced Thermal Treatment'.

8.33 In terms of the waste hierarchy, EfW is classed as 'other recovery' and so, as a means of managing waste is generally less preferred than recycling but more preferred than disposal. To qualify as recovery, energy from waste plants must achieve a minimum level of energy efficiency as defined by R1 status[35]. Without R1 status such plants are technically classed as disposal. However as noted above, for the purpose of monitoring progress towards the halving residual waste production per head target for 2042, waste managed through EfW is counted alongside waste disposed to landfill and waste converted to RDF regardless of its recovery status.

[35] The 'R1' value relates to the energy efficiency factor of an incinerator which determines the extent to which an incinerator uses waste as a fuel to generate energy. The minimum R1 value is 0.65 for municipal waste incinerators permitted and in operation after 31 December 2008. For further information see https://www.gov.uk/guidance/waste-incinerator-plant-apply-for-ri-status

8.34 At present there are no plants in west London which incinerate waste, however some facilities manufacture refuse derived fuel from residual waste arising in west London for incineration elsewhere. While the assessment of future waste management capacity requirements indicates that there is no identified need for EfW capacity to be developed in west London, given this form of waste management has certain characteristics which need particular consideration, Policy WLWP 3 is included to address these matters in the event that an application seeking planning consent for such a facility were to be received.

8.35 Unless captured, the burning of waste leads to the release of carbon dioxide, therefore, the more energy that can be recovered, the less carbon dioxide is emitted per energy unit. Policy SI 10 (E) 3) of the London Plan 2021 expects EfW facilities to meet a minimum performance of 400g of CO2 equivalent per kilowatt hour of electricity produced (this is known as the 'Carbon Intensity Floor'). To maximise their efficiency, EfW facilities should be designed and located so that surplus heat can be fully exploited. This could be through district heating or by nearby industry that can utilise the process heat either for heating or cooling. This kind of EfW plant is known as Combined Heat and Power (CHP). The LPA Local Plans include policies relating to developments that deliver heat and cooling to buildings located near a CHP facility.

8.36 The combustion of the biogenic elements of residual waste can generate low-carbon renewable energy, whereas burning non-biogenic waste, such as oil-based plastics, does not. The split of biogenic and non-biogenic materials in residual waste is currently thought to be roughly equal, but this is likely to shift during the Plan period as measures like separate food waste collection from households and businesses are put into place. However, non-biogenic waste generally has a high calorific value and so may be required to ensure EfW plants are viable.

8.37 The Sixth Carbon Budget of the Government's Climate Change Committee suggests that all EfW facilities should implement carbon capture and storage by 2040 to meet the national goal of net-zero carbon emissions by 2050. Considering that EfW plants have a minimum lifespan of 30 years, any EfW development proposal must account for this, as retrofitting Carbon Capture, Utilisation, and Storage (CCUS) may not be feasible once the plant is operational. The committee's budget also indicates that the required carbon reduction in waste management is anticipated to result from increased recycling, which should not be undermined by the provision of additional EfW capacity.

8.38 EfW results in the production of solid ash residues. In the case of mass burn incineration, two types of ash are produced: incinerator bottom ash (IBA) which is heavy ash that falls through the grate and air pollution control residues (APCr) which are reaction residues from emission control systems. Bottom ash can be recycled into an aggregate with some metal extraction and technologies can utilise APCr in the manufacture of construction materials.

8.39 EfW is likely to remain an essential part of waste management infrastructure in the medium term at least, especially if the management of unavoidable residual waste including such materials as persistent organic pollutants and other chemicals that are no longer acceptable for disposal to landfill increases in future.

Policy WLWP 3: Residual Waste Management & Energy Recovery

A. Proposals for the final management of residual waste by either 'other recovery' or disposal will only be supported if it is demonstrated all of the following criteria are met:

1. that the waste to be managed constitutes unavoidable residual waste that cannot practicably be managed higher up the waste hierarchy,
2. the proposals are in accordance with the proximity principle
3. a need for the capacity to serve west London will exist for the lifetime of the proposed facility.

No Conflict with Recycling

B. Proposals for management capacity for residual waste must not undermine recycling or lock-in the supply of residual waste for the lifetime of a plant

C. Proposals must demonstrate that:

1. incoming waste will be managed in accordance with waste hierarchy in priority order; and
2. a local need for capacity will exist for the lifetime of the proposed facility.

Energy Recovery

D. Proposals for waste management facilities capable of producing energy or a fuel must secure:

1. The local use of any heat through either connection to an existing heat network or through the provision to connect to a network in the future, including providing sufficient land to accommodate structures to facilitate the future implementation of local supply; or
2. The use of fuel either directly through piped supply or indirectly through pressurisation and transport; or if relevant
3. The use of any RDF produced in energy efficient facilities as a direct replacement for fossil fuels; or any other contribution to decentralised energy provision in London.

E. Energy from Waste facilities must demonstrate:

1. they qualify as a recovery operation as defined in the retained EU Waste Framework Directive and include measures to ensure energy recovery efficiency performance standards are maintained throughout their operational life as a minimum; and
2. the release of non-biogenic gaseous carbon emissions will be minimised, with mechanisms to capture for use and/or storage if use (and prevention) is not viable , incorporated into facility design; and
3. residues requiring offsite management will be managed prioritising further recovery and otherwise demonstrate safe disposal as a last resort.

8.40 Applicants for final fate capacity to manage residual waste will be required to submit a Waste Hierarchy Statement setting out how incoming waste will be managed in accordance with application of the waste hierarchy in priority order, plus that a local need for capacity will exist for the lifetime of the proposed facility.

8.41 Any EfW development will be subject to a condition that it shall cease to operate (or be upgraded within an agreed timeframe) if it falls below the minimum energy recovery efficiency performance standard.

Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities

Policy Purpose: All proposed waste management facilities in west London are designed and operated to the highest standards of environmental protection and contributes positively to the local area. The proximity principle is complied with where it is applicable, and the movement of processing residues is accounted for if and when they arise.

8.42 All waste related development should be of high quality and contribute to the achievement of other national and development plan policies and objectives including reducing greenhouse emissions, efficient resource use, protection and enhancement of the environment (including the water environment, biodiversity, heritage assets, archaeology and the historic environment) and the protection of amenity and health. Such requirements are set out in the London Plan Policy SI 8 and Local Plan policies. This applies not only to their operational impacts but also to the whole life-cycle carbon emissions associated with construction.

8.43 Policy WLWP 4 provides a range of criteria to ensure prospective developers consider and mitigate the impacts of their proposed development on the environment, the community and the appearance of the local area. While the criteria detailed in this Policy has been tailored to the specific characteristics of waste management facilities, it should not be read as an exhaustive list. Other policy areas may be relevant to specific types of developments or locations and applicants are advised to refer to other relevant policies set out in the London Plan, Local Plans, development management policy documents, site allocations and other local plan documents as appropriate.

8.44 High quality design that is sensitive to its context is crucial in managing and reducing adverse impacts of waste related development on the environment, amenity, and sensitive receptors. Noise, litter and all other emissions (including those to air and water) must be adequately controlled so as not to cause any adverse impact on the surrounding area.

Developers are expected to submit details of proposed control measures with any planning application. Where proposals involve operations which could result in fugitive emissions (e.g. noise, dust, litter etc.) there is an expectation that such operations will be properly contained and normally this will be achieved by enclosing operations within a covered building with vertical sides and defined access and egress points. Enclosure of operations within a building is particularly important given the majority of the Plan area is designated as an Air Quality Management Area. In exceptional cases, if it is shown that enclosure is not a practicable option, other mitigation such as acoustic screening and operational management measures will be required. Re-configuration and intensification of existing waste management sites may present opportunities to improve the design and performance of a facility.

8.45 The design and layout of the proposed development must ensure that proposed uses can successfully co-exist with surrounding uses, having regard to the amenity of adjacent occupiers and the operational requirements of existing and future uses including aerodromes, ensuring that potential conflicts will be adequately mitigated in accordance with the London Plan 2021 Policy D13 Agent of Change and any revised versions of the London Plan.

8.46 Proposed development should be designed to be resilient to climate change impacts including in terms of its location, setting and orientation and managing flood risk and extreme weather events.

8.47 The road network within west London is often congested and therefore proposals must demonstrate active consideration of transport modes other than by road. Where development is intended to rely on road based transport, there must not be any significant or unacceptable adverse impacts on the local road network or other road users. Careful routing of HGVs should be used and access must be shown to be safe and appropriate to the scale and nature of movements associated with normal

level of operations. Proposals should demonstrate that adequate parking for all vehicles is available on the proposed development site.

8.48 Other considerations to the local environment (such as flood risk, and transport), amenity and sensitive receptors (such as health and wellbeing) will need to be addressed, but as detailed earlier in this Plan, the Development Plan should be read as a whole and therefore have not been duplicated in this policy. As a general principle, proposed development should have no significant adverse effects on local biodiversity (applying the mitigation hierarchy of avoiding and minimising adverse impacts, before offsetting or compensating for damage) and opportunities to enhance biodiversity and green infrastructure on and around the site should be maximised to improve visual amenity and provide ecological benefit. Biodiversity net gain should also be secured in line with the statutory framework and any local policy requirements set out in the development plans of each WLLPA. In addition, proposed developments will be required to conserve and avoid harm to, or loss of significance of any heritage assets such as conservation areas, archaeological sites, listed buildings, etc. unless strong justification is provided.

8.49 Environmental permitting provides the appropriate mechanism for control of operational impacts from pollution and should be assumed to operate efficiently though it is strongly recommended that applicants consider these matters in tandem with the planning application and seek early advice from the Environment Agency. The need to enclose operations may be prescribed under environmental permitting and such requirements will normally require express planning consent. Where proposed developments give rise to effects that may adversely impact communities or areas outside the Plan area, consideration should be given to how these will be mitigated, with particular regard being given to any particularly sensitive receptors.

Policy WLWP 4: Ensuring High Quality and Resilient Waste Facilities

A. All applications proposing new or improved waste management facilities in west London must be designed, built and operated to achieve the highest practicable environmental standards, recognising that environmental standards will evolve over the lifetime of the Plan[36].

B. Proposals for development must demonstrate that:

1. The development is of a scale, form and character appropriate to its location and

2. the proximity principle has been complied with (where applicable) and

3. it will deliver a lasting and positive contribution to local communities, the economy and to the protection and enhancement of the environment throughout its operational life and post-closure (if applicable) and incorporates measures to;

i. avoid unacceptable adverse impacts arising from air and waterborne contaminants and other emissions, noise, dust, litter, vermin, vibration, odour, bioaerosols, external lighting, visual intrusion, traffic, birdstrike or associated risks to the environment and health and wellbeing of local communities;

ii. adapt and be resilient to the impacts of climate change; and

iii. minimise greenhouse gas emissions from all aspects of its operation, and

iv. control, reduce and mitigate impacts from vehicles including the use of low emission vehicles, installation of vehicle charging points and scheduling and management of vehicle routing.

v. any process residues requiring offsite management will be subject to recovery wherever practicable, or otherwise demonstrate how these will be disposed safely.

[36] Noting that where subject to an environmental permit, operational standards may be defined by the pollution control body from time to time; and standards for the performance of all built development set out in Local Plans and the London Plan apply.

Policy WLWP 5 – Deposit of Waste on Land

The Policy Purpose: To ensure that the landfilling of non-inert waste is minimised (in accordance with the waste hierarchy) and that potential impacts of landfill, including any reworking and restoration and aftercare are properly managed. Provision for the deposit of inert waste on land for beneficial purposes where needed.

Non-inert Waste Landfill

8.50 The disposal of waste is at the bottom of the waste hierarchy as the least preferred form of waste management, and non-inert waste should be sent to landfill only if it cannot be managed by methods higher up the Waste Hierarchy i.e. it is an option of last resort. In exceptional circumstances it may be demonstrated that there are certain types of waste (e.g. some industrial or hazardous waste) which cannot practically be managed by any other means and so landfill[37] is the only option. Such wastes are generated in comparatively limited amounts and are generally handled at specific landfill sites which may be specifically designated for hazardous waste or within specially constructed cells at non-inert landfill sites.

8.51 Non-inert landfill has been undertaken in west London in the past, however there are currently no voids which would be suitable for non-inert waste landfilling. Therefore, any provision of such capacity would involve the creation of new void space either by extracting material for other purposes like engineering, or by altering the land's natural contours, or a combination of these two methods. In either case the underlying geology would need to be suitable to prevent escape of pollution to underlying groundwater resources.

[37] The term 'landfill' should also be taken to include landraising.

8.52 Landfilled non-inert waste often gives rise to the production of landfill gas (including methane) and leachate, both of which need proper containment and management to ensure they do not cause pollution of the environment or harm to human health. In light of this, the provision of new capacity is largely reliant on the presence of certain geological and hydrogeological conditions that minimise the risk of groundwater pollution. While being a potential pollutant, landfill gas can be captured and put to use as a fuel to produce energy. It should also be noted that such facilities can increase risk of birdstrike by aircraft. The Plan area includes RAF Northolt and Heathrow Airport subject to Aerodrome Safeguarding Zone, and development must not compromise aircraft safety or restrict the operational capability of these aerodromes. Applicants proposing developments that may attract scavenging birds within the Aerodrome Safeguarding Zones are encouraged to engage with airport operators at an early stage to ensure proposals are in compliance with relevant restrictions and will not compromise aircraft safety.

8.53 The restoration of landfill sites offers opportunities to enhance the environment for example by providing wildlife habitats and or recreational opportunities e.g. country parks.

8.54 In addition to generating more void space, the reworking (or 'mining') of current or historical and restored landfill sites could in some circumstances potentially free up land for development and or create opportunity for the extraction of recyclable or recoverable materials previously discarded. Older landfills might also require reworking to remove waste causing pollution and or to prevent the uncontrolled release of pollutants. However, there are significant risks associated with the reworking of landfill sites as hazardous materials may have been disposed of without being recorded. After the closure of landfills, other development, such as the building of housing, may have taken place in proximity, which could be sensitive to any change in the historic site, and the need to avoid negative impacts from disturbing a settled waste mass

must be considered very carefully. Generally, the disturbance of existing waste masses containing hazardous waste should be avoided due to the risks associated with it. An Environmental Permit, intended to ensure there is no pollution of the environment or harm to human health will also likely be required for any such activity and advice from the Environment Agency should be sought.

Deposit of Inert Waste on Land for Beneficial Purposes

8.55 Some inert waste (mainly excavation waste e.g. soils and subsoils) is of a nature that lends itself for use in engineering operations such as landscaping and engineered structures such as flood defences or amenity bunds. To mitigate impacts on landscape and visual amenity, voids created by mineral working often require restoration by backfilling.

8.56 In waste hierarchy terms, the beneficial use of inert waste on land is classed as 'other recovery'. Policy SI 7 of The London Plan expects that 100% of inert excavation waste be put to a beneficial use.

8.57 The availability of land in west London for the deposit of inert excavation waste is constrained and so such waste may be transported outside of London for management. Paragraph 9.8.1 of the London Plan 2021 recognises that achieving net self-sufficiency by 2026 does not apply to excavation waste in particular.

Policy WLWP 5 – Recovery and Disposal of Waste to Land

A. Proposals for the deposit of inert waste to land will be supported in principle where it is demonstrated that:

1. the waste will be deposited for a beneficial purpose, which cannot practicably or reasonably be achieved in any other way; and
2. the minimum amount of waste necessary will be used to deliver intended benefits or improvements; and
3. it is not practical to re-use or recycle the waste.

B. Proposals for the disposal of non-inert or inert waste to land will be resisted unless it can be demonstrated that:

1. there is an overriding need for additional disposal capacity; and
2. the waste cannot practicably and reasonably be re-used, recycled, or recovered in some other way in any other way; and
3. measures to maximise landfill gas capture and utilisation and minimise leachate production from the proposal are put in place where needed.

C. In all cases, the resulting final landform, landscaping treatment and after uses must be designed to take account of, and where appropriate, enhance the surrounding landscape, topography and the natural and historic environment, and protect water quality.

Policy WLWP 6 – Circular Economy and Resource Efficiency

Policy Purpose: To drive waste reduction and high-value resource recovery in west London, all development proposals for new or substantially redeveloped waste management facilities must demonstrate how Circular Economy principles will be integrated.

8.58 Circular economy principles are an alternative to a traditional linear economy (make, use, dispose) and keeps resources in use for as long as possible until the resources and products are recovered and regenerated at the end of each service life. This means, therefore, that proposals for waste related development coming forward should be designed so that materials used in their construction and the waste they intend to manage are kept in use for as long as possible, via reuse and repair, and high quality locally relevant recovery.

8.59 Integrating circular economy principles into waste related development can deliver a wide range of environmental, social and economic benefits. By keeping materials in use for longer, circular approaches contribute to reducing the demand for the extraction of virgin materials, reducing associated environmental impacts including carbon emissions. Development designed to support repair, remanufacturing, recycling and innovative reuse centres can support local job creation in emerging green industries while reducing a reliance on landfill and incineration.

8.60 Planning has a role to play in delivery of the necessary infrastructure to facilitate the circular economy, although it is recognised that delivery will also need to be on a strategic level with reliance on other parties. There is a need to consider the current, future and legacy waste infrastructure, and what waste management would look like in a fully circular economy. Delivery may be through local circular economy hubs that facilitate material exchange, re-use and remanufacturing, supported by a network of local high quality facilities combined with larger-scale infrastructure.

There should be consideration as to how proposals integrate with the existing network, ensuring where relevant there is inclusive public access, as well as integration with existing communities including local groups. Proposals for waste related development located in or near designated industrial areas should seek synergies with the wider needs of the locality. The co-location of waste uses with complementary industrial uses will be supported where it demonstrably enhances resource efficiency.

Circular Economy Statements

8.61 Supporting information with an application for waste related development should be proportionate to the nature and scale of the proposal, detailing how materials will be managed throughout the lifecycle of the facility. A circular economy statement or checklist should be submitted in accordance with London Plan Policy SI 7 and relevant Local Plan policy requirements.

8.62 Construction of waste related built development should maximise the use of recycled and or reused materials and sourcing of materials should prioritise local supply. There should be consideration as to how built development can be designed and constructed to ensure that it is less likely to result in waste being produced in the first place. Examples include using modular off-site construction techniques and designing built development in ways to facilitate adaptable to changes in their use.

8.63 Proposals for waste related development are expected to demonstrate how the development will integrate with digital technologies, modular systems and be located close to complementary land uses (e.g. energy users, users of materials and logistics) to maximise resource efficiency opportunities.

8.64 Soil management is essential to sustaining all natural systems, and impacts across a range of matters including landscape, ecology, forestry, flooding and contaminated land issues. The retention of healthy soil can be aided by minimising the installation of hard surfaces on development

sites. Where appropriate, applicants may need to submit a soil survey and soils management plan that sets out the quality and type of soils on site, the impact of development on the soil, as well as detail on how movement and damage to soils will be minimised during construction.

8.65 Policy WLWP 6 provides the framework on the specific requirements for the land, facilities and infrastructure required to deliver the local needs to support the principles of the circular economy and promote more sustainable waste management practices within the Plan area. This policy should be read in conjunction with other strategic and local planning policies set out in the London Plan, borough or OPDC local plans, development management policy documents, site allocations and other local plan documents as appropriate. In particular, waste related proposals should support local development plan policies on waste, industrial land, climate resilience and biodiversity.

Policy WLWP 6: Circular Economy and Resource Efficiency

Proposals for waste related development should:

A. ensure, where practicable, that waste infrastructure supports the transition to a low-carbon circular economy, consistent with the London Environment Strategy (current and any subsequent update) and relevant local sustainability targets, by demonstrating how the proposal will ensure materials are managed at the highest level of the waste hierarchy; and

B. demonstrate how circular economy principles have been incorporated into all aspects of its design, construction and operation**.**

Policy WLWP 7 –Wastewater Treatment Infrastructure

Policy Purpose

To provide for new wastewater treatment capacity to be developed and existing capacity to be safeguarded and enhanced where needed.

8.67 Wastewater generally comprises surface water runoff and effluent discharged to the foul sewer system from homes and industrial and commercial premises from where it is channelled to wastewater treatment works (WWTW). Output of this treatment is sewage sludge (aka bioresources) that may be applied to land as a fertiliser or further treated either through anaerobic digestion to produce biogas or incineration to produce energy. The resulting cleaned effluent may be discharged to controlled waters in accordance with a discharge consent granted by the Environment Agency.

8.68 In west London wastewater and the sewage sludge that results from its treatment is managed by Thames Water Utilities Ltd. Mogden Sewage Treatment Works located in the London Borough of Hounslow is the key facility serving the Plan area. A major upgrade is underway to enable biomethane supply to the gas grid.

8.69 Development proximate (up to 800m) to a WWTW may be affected by odour arising from a WWTW. The Agent of Change principle, as set out in the NPPF and the current London Plan, requires that existing businesses and facilities should not have unreasonable restrictions placed on their operations as a result of development permitted subsequent to their establishment.

Policy WLWP7 Wastewater Treatment Infrastructure

Proposals for the development of infrastructure for the treatment of wastewater and management of resultant sewage sludge, including upgrades to existing works, will be permitted, provided that:

1. it is demonstrated that there is an identified need in that location; and,
2. proposals are in accordance with other policies of this Plan, in particular Policy WLWP4 (clauses A, B1, & B3 relating to design, appropriate location and delivering a positive contribution to the environment, economy and community) together with any other relevant policies of the applicable Development Plan.

Existing wastewater treatment infrastructure will be safeguarded from development which may conflict with the use, operation and expansion of these facilities. In accordance with the Agent of Change principle, proposals for development proximate to existing WWTWs must demonstrate the proposed development will not adversely affect the operation of the WWTW and will if necessary incorporate measures to mitigate any potential adverse effects.

8.70 The need for and investment in wastewater treatment capacity is determined through 'Asset Management Plans' reviewed on a five-yearly basis and regulated by OFWAT. Thames Water use information in the public domain to identify what and when upgrades to wastewater treatment capacity will be required. This can be driven by requirements from a growing population, commercial and residential development, and changing environmental standards. This provides evidence of the need for enhancement or expansion of existing facilities or development of new facilities.

8.71 Where the operation of an existing WWTW facility could have a significant adverse effect on proposed new development in its vicinity, the applicant (or 'agent of change') is required to provide suitable mitigation of the effects. This would include an assessment of the likelihood that odour would have a significant adverse effect on occupants of the proposed development, and measures to mitigate such adverse effects are taken.

Chapter 9: Policies Map

9.1 The Policies Map for the Plan comprises location maps of the existing waste sites to be safeguarded shown in Appendix 3.

Glossary

A	
Agent of change	A new development within an area that is of such a nature that it might be impacted by existing development or impact on that development (e.g. housing proposed within an industrial area). The 'agent of change principle' sets out a position that an applicant for planning permission (i.e. the 'agent of change') is responsible for managing any conflicts between the proposed development and existing development.
Aggregates and soils recycling	Rubble, hardcore and soil from construction and demolition projects may be retained for use on-site in place of primary aggregate. Alternatively, it can be taken to purpose-built facilities for crushing, screening and re-sale.
Agricultural waste	This mostly covers natural waste such as animal slurry or by products but also scrap metals, plastics, batteries, oils, tyres, etc. The regulations for this waste stream mean farmers can no longer manage certain waste produced within a farm unit, within the unit (historically the case) as regulations determine whether or not waste can be burnt, buried, stored or used on the farm or must be sent elsewhere for management.
Amenity	Amenity is a broad concept and is not specifically defined in Planning legislation. It is a matter of interpretation by the local planning authority and is usually understood to be the pleasant or normally satisfactory aspects of a location which contribute to its overall character and the enjoyment of residents, business users and visitors. Amenity can be adversely affected by development impacts such as noise, dust, odour and visual change.

Anaerobic Digestion (AD)	A process comprising the breakdown of organic material in the absence of air. It is carried out in an enclosed vessel and produces methane that powers an engine used to produce electricity. The useful outcomes of AD are electricity, heat, and the solid material left over called the digestate. Both the heat and the electricity can be used or sold if there is a market and the digestate can either be sold or used for agricultural purposes (land spread). AD can only be used for some biodegradable parts of the waste stream e.g. sewage sludge, agricultural waste and some organic municipal and industrial waste.
Apportionment	The amount of HIC waste allocated by the London Plan to each London Borough for which management capacity needs to be provided.
Authority Monitoring Report (AMR)	The AMR reports progress in meeting the milestones of the adopted Local Development Scheme and monitors the impact of policies when the plans are adopted. The timescale covered in each report is determined by the nature of the topic in terms of its strategic importance and sensitivity to changing circumstance.
B	
Best and most versatile agricultural land	Land categorised as being of grades 1, 2 or 3a under the Agricultural Land Classification system.
Bioaerosols	Airborne material containing biological material from animals, plants, insects or microorganisms. They are produced wherever biological material is being processed, milled, or chopped and are commonly associated with organic waste composting facilities. Bioaerosols can have impacts on health.
Biodegradable waste	Any waste that is capable of undergoing natural decomposition, such as food and garden waste, paper and cardboard.
Biodiversity	The variety of all life on earth (mammals, birds, fish, invertebrates, plants, etc). In planning, it is often used to refer to nature conservation.
C	

Catchment	The geographical area served by a particular waste management activity. This will vary according to the adequacy of transport links and the economics of transporting different types of waste
Circular Economy	A circular economy is an alternative to a traditional linear economy (make, use, dispose) in which resources are kept in use for as long as possible, the maximum value is extracted from goods and services whilst in use, and, finally, resources and products are recovered and regenerated at the end of each service life.
Climate change adaptation	Adjustments to natural or human systems in response to actual or expected climatic factors or their effects, including from changes in rainfall and rising temperatures, which mitigate harm or exploit beneficial opportunities
Climate change mitigation	Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.
Combined heat and power facilities (CHP)	CHP plants generate electricity as well as providing local heat, and sometimes even cooling, to various types of users.
Commercial and Industrial (C & I) Waste	Waste generated by business and industry, for example: wholesalers; catering establishments; shops and offices; factories and industrial plants. Generally, businesses are expected to make their own arrangements for the collection, treatment and disposal of waste generated by their actions. Waste from smaller businesses where collection arrangements have been set up by the local authority is considered to be LACW.
Composting	The breaking down of organic matter aerobically into a stable material that can be used as a fertiliser or soil conditioner. This can be undertaken commercially in open air (in 'windrows') or inside containment ('in-vessel'), and at a smaller scale by households at home or collectively by communities.
Conservation Area	An area designated by the LPA because of its special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance.

Contaminated Land	Contaminated land is land that has been polluted or harmed in some way making it unfit for safe development and usage unless cleaned.
Construction, Demolition and Excavation (C, D & E) Waste	The waste produced from the construction of new buildings or structures and associated demolition of existing buildings or structures. It mostly comprises brick, concrete and hardcore but can also include timber, metals, plasterboard and plastics. Excavation waste primarily arises from groundworks and earth moving, and consists of subsoil and topsoil.
D	
Decentralised Energy	Local renewable energy and local low-carbon energy usually but not always on a relatively small scale that may encompass a range of technologies.
Deposit of Waste on Land	The placement of waste on land for the purpose of its management. This may include landfill or land raise operations, or, in the case of inert waste may involve its use in engineering works such as landscaping mounds.
Development Plan	The development plan has statutory status as the starting point for decision making. Section 38(6) of the Planning & Compulsory Purchase Act 2004 and Section 70(2) of the TCPA 1990 require that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. For waste proposals within London the development plan comprises the London Plan, Local Plans and DPDs and joint Waste Plans as well as neighbourhood plans.
Disposal	Disposal means any waste management operation which is not 'recovery' even where the operation has a secondary consequence, the reclamation of substances or energy
Dry Mixed Recyclables (DMR)	Typically composed of: Paper - e.g. dry paper waste, newspapers, office paper and magazines Cardboard – e.g. corrugated cardboard, cereal boxes and card Metal cans – e.g. clean, empty drinks cans and food tins Plastic – e.g. packaging films, rinsed out milk bottles, empty drinks bottles & clean salad trays, rinsed out margarine tubs & microwaveable meal trays

E	
Encroachment	Development which is sensitive to the normal operations of a waste/wastewater facility being built near to an existing such facility
	which may hinder its operation by requiring changes to its operating practices (e.g. reduced vehicle movements, operating hours)
Energy from Waste (EfW)	The process of managing waste to generate energy - usually in the form of electricity or heat usually by means of thermal treatment. Many wastes are combustible, with relatively high calorific values – this energy can be recovered through processes such as incineration with electricity generation, gasification or pyrolysis. EfW generally falls within the 'other recovery' category in the waste hierarchy.
Energy Recovery	Covers a number of technologies, though most energy recovery is through incineration. Many wastes are combustible, with relatively high calorific values – this energy can be recovered through processes such as incineration with electricity generation (and where possible heat recovery), gasification or pyrolysis.
European Site	Sites designated for their nature conservation importance (under the EC Birds Directive and EC Habitats and Species Directive) and protected by the Habitats Regulations. This includes Special Protection Areas (SPAs) for birds, and Special Areas of Conservation (SACs) under the Habitats Directive.
G	
Green Belt	A national planning designation, which aims to prevent urban sprawl by keeping land around certain cities and large built-up areas permanently open or largely undeveloped, defined more fully in the NPPF.
Greenfield land	Land that has not been developed. Not to be confused with Green Belt.
Greenhouse gas (GHG)	GHGs trap heat in the atmosphere. Many gases exhibit greenhouse properties, including carbon dioxide, methane, water vapour, and nitrous oxide.

Green and blue infrastructure	A network of multi-functional green space or wetlands and waterways, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.
H	
Habitats Regulation Assessment (HRA)	An assessment under the Habitats Regulations to test if a plan or project could significantly harm the designated features of a 'Habitat site'. Proposals affecting proposed SACs, potential SPAs, Ramsar Sites (wetlands of international importance) also require HRA.
Hazardous waste	Controlled waste that is dangerous or difficult to treat, keep, store or dispose of, so that special provision is required for dealing with it. Hazardous wastes are the more dangerous wastes and include toxic wastes, acids, alkaline solutions, asbestos, fluorescent tubes, batteries, oil, fly ash (flue ash), industrial solvents, oily sludges, pesticides, pharmaceutical compounds, photographic chemicals, waste oils, wood preservatives. If improperly handled, treated or disposed of, a waste that, by virtue of its composition, carries the risk of death, injury or impairment of health, to humans or animals, the pollution of waters, or could have an unacceptable environmental impact. It should be used only to describe wastes that contain sufficient of these materials to render the waste as a whole hazardous within the definition given above. Defined in the Hazardous Waste (England and Wales) Regulations 2005 (as amended).
Heritage assets	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Designated Heritage assets are the most protected and include listed buildings, scheduled ancient monuments, registered parks and gardens, registered battlefields, and World Heritage Sites.

Household waste	Waste from a domestic property, caravan, and residential home or from premises forming part of a university or school or other educational establishment and premises forming part of a hospital or nursing home. Defined in The Controlled Waste (England & Wales) Regulations 2012.
I	
Incineration	The controlled burning of waste usually in purpose-built plant subject to stringent standards for emissions to air. Bottom ash may be used in building materials. Incineration that involves the capture of energy falls within the category 'Energy from Waste'.
Inert waste	Inert waste means waste that does not undergo any significant physical, chemical or biological transformations when untreated. Inert waste will not dissolve, burn or otherwise physically or chemically react, biodegrade or adversely affect other matter with which it comes into contact in a way likely to give rise to environmental pollution or harm human health. The total leachability and pollutant content of the waste and the ecotoxicity of the leachate must be insignificant, and in particular must not endanger the quality of surface water and/or groundwater. Non-inert (including non-hazardous) waste is all other waste other than as identified above (including hazardous).
L	
Landfill and land raise	The term landfill relates to waste disposal mainly below ground level (by filling a void) whereas land raise refers to waste disposal mainly above pre-existing ground levels. They are generally the least preferred method of waste management in the waste hierarchy.
Listed buildings	A building of special architectural or historic interest in a list compiled by the Secretary of State under the Planning (Listed Buildings & Conservation Areas) Act 1990, thereby having statutory protection. Listing of buildings includes the interior as well as the exterior of the building, and any nearby buildings or permanent structures within the curtilage (e.g. walls and outbuildings). Historic England is responsible for

	designating buildings for listing in England.
Local Authority Collected Waste (LACW)	All waste collected by or on behalf of a local authority. It includes household waste and other waste where collection is arranged by the local authority. LACW replaced the term 'municipal' waste.
Local Development Scheme	The timetable produced by each LPA for the preparation of Local Plans.
Local Nature Reserves (LNRs)	An area designated by local authorities, in consultation with Natural England under the National Parks & Access to the Countryside Act 1949, to provide opportunities for educational use and public enjoyment, in addition to protecting wildlife or geological and physiographical features of special interest.
Local Planning Authorities (LPAs)	The public authority whose duty it is to carry out specific planning functions for a particular area.
Local Plan	A plan for the future development of a local area, drawn up by the LPA in consultation with the community. In law this is described as the development plan documents adopted under the Planning & Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under law would be considered to be DPDs, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.

Local roads	These are taken to include: A roads (not including trunk roads and primary routes). B roads – which are roads intended to connect different areas, and to feed traffic between A roads and smaller roads on the network. Classified unnumbered roads which are smaller roads intended to connect together unclassified roads with A and B roads, and often linking a housing estate or a village to the rest of the network. Similar to 'minor roads' on an Ordnance Survey map and sometimes known unofficially as C roads. Unclassified roads which are local roads intended for local traffic. The vast majority (60%) of roads in the UK fall within this category.
LSIS	Locally Significant Industrial Sites.
M	
Major development	For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m2 or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.
Mass burn incinerator	Large facilities where waste is burnt, and normally where energy is captured for use to produce electricity as a minimum.
N	
National Planning Policy Framework (NPPF)	The NPPF sets out the Government's planning policies for England and how these are expected to be applied.
National Planning Policy for Waste (NPPW)	Adopted in October 2014, this document sets out the Government's waste planning policies for England.
Net self-sufficiency	To have sufficient waste management capacity capable of managing the equivalent amount of waste to that expected to arise within a Plan area.

Non-inert waste	A waste that will biodegrade or decompose, releasing environmental pollutants. Examples include: wood and wood products, paper and cardboard, vegetation and vegetable matter, leather, rubber and food processing wastes.
O	
Open space	All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.
Other Recovery	Other recovery is not specifically defined in the revised Waste Framework Directive, although 'energy recovery' is referenced as an example. It can be assumed by their exclusion in the definition of recycling, that processing of wastes into materials to be used as fuels or for backfilling can be considered 'other recovery'.
P	
Plan area	The geographical area covered by the West London Joint Waste Plan i.e. the area covered by the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond upon Thames and that part of Ealing and Brent that falls under the aegis of OPDC.
Pollution	Anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.
Planning Practice Guidance (PPG)	Government guidance intended to assist practitioners in interpreting national planning policy.

Previously developed land	Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardsurfacing providing it has been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.
Proximity Principle	The 'proximity principle' is set out in paragraph 4 of Part 1 of Schedule 1 to the *Waste (England and Wales) Regulations 2011* within the context of the requirement for mixed municipal waste collected from private households to be disposed of, or recovered, in one of the nearest appropriate installations, by means of the most appropriate methods and technologies, in order to ensure a high level of protection for the environment and public health.
Public Rights of Way (PRoW)	PRoW are paths that all members of the public can legally use: footpaths – for walking, running, in mobility scooters or powered wheelchairs; bridleways – for walking, horse riding, bicycles, mobility scooters or powered wheelchairs; restricted byways – for any transport without a motor and mobility scooters or powered wheelchairs; byways open to all traffic – for any kind of transport, including cars (but mainly used by walkers, cyclists and horse riders).
Pyrolysis	The thermal decomposition of waste in the absence of oxygen, resulting in the production of liquid, gas or char whose after-use depends on the type of waste incinerated.

R	
Receptor	Existing land uses that could be affected by a proposed development. Some examples of receptors include: Residential dwellings; hospitals; commercial premises; and, footpaths.
Recovery	Recovery means any waste management operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy.
Recovery to Land	The use of inert material for a genuine beneficial use such as landscape and/or amenity improvements.
Recycling	Recycling is a recovery operation by which waste materials are returned to be processed into products, materials or substances whether for the original e.g. glass to remelt or other purposes e.g. glass to aggregate. Includes the reprocessing of organic material but not energy recovery or the reprocessing into materials that are to be used as fuels or for backfilling operations.
Refuse Derived Fuel (RDF)	Residual waste that is prepared for thermal treatment in an energy from waste facility or co-incineration plant.
Renewable and low carbon energy	Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass, ground and air, and geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).
Residual waste	The elements of the waste streams that remain following the maximising of recovery operations. Residual waste now defined as that managed by landfill, EfW and as RDF.
Restoration	Process of returning a site or area to a desirable condition following waste

	management use or mineral extraction.
Reuse	Re-using products and materials as part of the circular economy, avoiding the need for re-processing or disposal. The preferred fate on the waste hierarchy for waste produced. The commercial sector can reuse products designed to be used a number of times, such as reusable packaging. Householders can buy refillable containers or reuse plastic bags. Reuse can save raw materials, energy and transport costs.
S	
Safeguarding	The protection of existing waste sites from development that may limit or constrain their use, now or in the future.
Sites of Special Scientific Interest (SSSI)	A site which is of special interest by reason of any of its flora, fauna, or geological or physiographical features and has been designated by Natural England under the Wildlife and Countryside Act 1981.
Special Areas of Conservation (SAC)	Areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites.
Special Protection Areas (SPAs)	Areas classified under regulation 15 of the Conservation of Habitats and Species Regulations 2017 which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds.
Strategic Industrial Locations	Sites identified (including in the London Plan, Policy E5) as critical to the London economy and which can accommodate concentrations of industrial, logistics and related activities and land uses including waste management.
Sustainability Appraisal (SA)	A process of analysing and evaluating the environmental, social and economic impacts of the plan or programme, often in conjunction with an SEA.

Sustainable Waste Management	Waste management in line with the waste hierarchy in which waste generation is avoided as far as possible, materials and products are re-used, recycled or have as much value recovered from them as possible, before disposal is considered. This is delivered through product design, behaviour and choices, and through provision of sufficient waste management capacity of the required type, where possible proximate to where waste arises.
Supplementary planning documents	Planning documents which expand upon policy or provide further detail to policies in development plan documents, but do not have development plan status
T	
Thermal treatment	A waste management operation that involves the use of heat to process waste and generally involves the production of energy. Incineration is a thermal treatment but 'Energy from waste' is the term more generally used to describe waste management involving incineration.
Tonne	Metric Ton. 1000 kilos, equal to 2004 lbs.
tpa	Tonnes per annum
Mtpa	Million tonnes per annum.
W	
Waste	Any substance or object that the holder or the possessor discards or intends to discard or is required to discard.
Waste arisings	This is the amount of waste produced in a given area, normally a Plan area, at a given period of time, usually reported as tpa.
Waste Disposal Authority (WDA)	A local authority responsible for managing the waste collected by the collection authorities and the provision of household waste recovery centres. In this case the West London Waste Authority (WLWA) is a joint WDA for the whole Plan area.

Waste Hierarchy	A framework for management of waste, which ranks waste management options according to what is best for the environment. The most preferable option is preventing waste generation, followed by preparing materials for re-use, then recycling and composting, then recovering as much value from them as possible including energy. Disposal to landfill or incineration without energy recovery at the bottom as last the option of last resort.
Waste Planning Authority (WPA)	The local authority responsible for waste development planning and development management. In this case the West London Local Planning Authorities.
Waste streams	Waste that may arise from distinct activity such as 'commercial and industrial', 'construction, demolition and excavation, or has specific characteristics such as 'hazardous'.
Wastewater	Water discharged to sewers including waste in liquid form as well as surface water runoff. This raw wastewater is collected in sewers and transferred to wastewater treatment works where it is treated in such a way that produces largely reusable sewage sludge and effluent that is discharged to watercourses.
Water environment	The "water environment" encompasses all waterbodies and ecosystems that are influenced by water, including rivers, lakes, wetlands, groundwater, coastal waters, and seas. It also involves the complex interactions between water, land, and living organisms, as well as the human activities that affect these systems. The water environment therefore includes the broader ecological and environmental context in which water exists. This includes the quality, availability, and sustainability of water resources, as well as the impact of human activities on these water bodies.

Appendix 1: Monitoring Framework

Monitoring of this West London Waste Plan will take place in accordance with the framework set out below.

Introduction

This Monitoring Framework explains how implementation of this updated WLWP will be monitored over the Plan period. It translates the Strategic Objectives and Plan Policies into a set of measurable indicators, targets and review triggers so that it is possible to establish how effective implementation of the Policies are in achieving the Strategic Objectives and the extent to which corrective action may be needed.

Monitoring will take place at least annually and outcomes reported in Authority Monitoring Reports (AMR).

Structure

- The indicators are grouped under each of the Strategic Objectives and mapped to the policies intended to achieve the specific objectives. This ensures that there is a coherent thread from the Vision and Objectives to policy delivery and measurable outcomes.
- The framework focuses on indicators that are material to decision-making and measurable from established datasets.
- Each entry identifies the bodies primarily responsible for delivering the outcomes each of the policies is intended to achieve (not just collecting data). The fact that there may be more than one body identified with responsibility illustrates that there is shared responsibility in achieving the Plan's objectives.

Column headings of the Monitoring Framework are explained below:

- Policy – The reference number of the Policy which the indicator is seeking to monitor the efficacy and implementation of;
- Indicator – What the monitoring indicator is intended to measure;
- Purpose – How the indicator will monitor for the policy outcome;
- Target – The intended measure of success achieved by implementation of the Policy;
- Data Sources – various sources of data available to measure implementation of the policy. The framework relies on publicly accessible statutory/official datasets and local registers (e.g., Waste Data Interrogator, Waste Data Flow, Hazardous Waste Interrogator, Environment Agency permit register, local planning registers and compliance data gathered). Where data is incomplete, an explanation will be provided in the AMR, and, if appropriate, interim proxy indicators used until full data is available. During the Plan period the LPAs may also monitor additional indicators and report on associated performance in the AMRs as additional datasets become available.
- Delivery Responsibility – which bodies contribute towards implementation of the policy:
    - Local Planning Authorities (LPAs): determine planning applications against policies and grant planning permission, maintain planning registers of their decisions, enforce against unlawful activities, and report through AMRs.
    - WLWA and operators: supply operational data and are primarily responsible for the type and quantum of waste management capacity provided in the Plan area.
    - Environment Agency (EA): Maintains the WDI and HWDI, as well as permit registers. The EA also issues Environmental Permits which

permit the operation of waste management facilities including conditions to limit pollution events and submit waste returns and enforces these conditions.

- Strategic partners (e.g., Network Rail, Port of London Authority, GLA): support safeguarding and utilisation of rail and water transport capacity.

Strategic Objective 1: Make best use of existing waste infrastructure to manage waste efficiently

Ref.	Policy	Indicator	Purpose	Target	Data Sources	Delivery Responsibility
1	WLWP 1	HIC waste qualifying management capacity (tpa)	Ensure sufficient capacity to meet London Plan apportionments for duration of Plan period	Maintain sufficient qualifying capacity to meet collective WLWP London Plan apportionments and any capacity sharing agreements.	Planning register; EA permit register; DM teams; Operators inc. WLWA. Waste Data Interrogator (WDI); Wastedataflow;	Local planning authorities (LPAs), GLA, Waste Industry, Environment Agency (EA) WLWA (LACW)
2	WLWP 1	C&D waste arisings and recovery capacity (tpa)	Maintain self-sufficiency for C & D waste for duration of Plan period. Ensure London Plan management targets are met,	C & D waste arisings are less than, or equivalent to, C&D waste management capacity in west London	WDI; planning register EA permit register; DM teams; Operators inc. WLWA	LPAs, Waste Industry, EA
3	WLWP 2	Hazardous waste arisings, capacity and exports (tpa)	Provide for identified hazardous waste management needs	Capacity sufficient to meet identified WL / London need except where capacity elsewhere is confirmed as secure.	Hazardous Waste Data Interrogator (HWDI); planning register; EA permit register; DM teams; Operators.	LPAs, Waste Industry, EA
4	WLWP 1	Safeguarded HIC waste management	Maintain sufficient existing HIC waste management	No net loss of safeguarded HIC waste management	Planning register; EA permit register; DM teams; WDI.	LPAs, developers, GLA

Ref.	Policy	Indicator	Purpose	Target	Data Sources	Delivery Responsibility
		capacity (tpa)	capacity	capacity unless lack of London-wide need demonstrated	GLA monitoring data for London-wide net self sufficiency	
5	WLWP 1	Safeguarded C&D waste management capacity (tpa)	Maintain sufficient C&D waste management capacity	No net loss of safeguarded C&D waste management capacity unless lack of London-wide need demonstrated	Planning register; EA permit register; DM teams; WDI. GLA monitoring data for London-wide net self sufficiency	LPAs, developers, GLA
6	WLWP 1	Safeguarded hazardous waste management capacity (tpa)	Maintain sufficient hazardous waste management capacity	No net loss of safeguarded hazardous waste management capacity unless lack of London wide need demonstrated	Planning register; EA permit register; DM teams; HWDI. GLA monitoring data for London-wide net self sufficiency	LPAs, developers, GLA
7	WLWP 1 & WLWP 7	Nature of new development adjacent to existing safeguarded waste site.	Ensure new development does not encroach on/limit potential of safeguarded existing waste operations	New development only consented with appropriate mitigation	Planning register; DM teams	LPAs, developers

Strategic Objective 2: Encourage facilities that contribute to the achievement of a Circular Economy to come forward

Ref.	Policy	Indicator	Purpose	Target	Data Sources	Delivery Responsibility
8	WLWP 2 & WLWP 6	No. of Circular Economy (CE) Hubs	Reduce waste production through reuse, repair and material exchange	1 CE hub per LPA area	Planning register; DM teams; EA permit / exemptions register (if applicable);	LPAs, industry, WLWA, developers
9	WLWP 2	Sufficient capacity for recycling rate for municipal (HIC) waste to be achieved(%)	Minimise production of residual waste i.e. waste left after reuse/ recycling maximised	Meet/exceed London Plan recycling targets (≥65% by 2030) for municipal waste	WDI; Wastedataflow; WLWA GLA municipal waste dataset	LPAs, WLWA, Waste Industry, EA, developers
10	WLWP 2	Sufficient capacity for recycling rate for C&D waste to be achieved(%)	Minimise production of residual waste i.e. waste left after reuse/ recycling maximised	95% recycling / reuse / recovery of C&D waste	WDI; DM Teams LAA (recycled aggregate supply) SWMP and Circular Economy Statements submitted by developers	LPAs, Waste Industry, EA, developers via SWMP and Circular Economy Statements
11	WLWP 2	Sufficient capacity to facilitate beneficial use	Maximise beneficial use of inert excavation waste.	100% inert excavation waste put to beneficial use as per London Plan	WDI; DM teams SWMP and Circular Economy Statements submitted by	LPAs, WLWA, Waste Industry, EA, developers via SWMP and Circular

Ref.	Policy	Indicator	Purpose	Target	Data Sources	Delivery Responsibility
		of inert excavation waste (%) inc railheads		target.	developers	Economy Statements
12	WLWP 2	Landfill rate for biodegradable or recyclable waste (%)	Disposal to landfill as last resort for non residual waste	No biodegradable or recyclable waste sent to landfill from 2026 onwards.	WDI; Wastedataflow; Landfill Tax returns	LPAs, WLWA, Waste Industry, EA, HMRC
13	WLWP 2	Location of facilities	Facilities are in appropriate locations	100% of newly consented waste management capacity in locations specified in WLWP2	Planning register; EA permit / exemptions register; DM teams;	LPAs, Waste Industry, EA

Strategic Objective 3: Decarbonise waste transport and processing

Ref.	Policy	Indicator	Purpose	Target	Data Sources	Delivery Responsibility
14	WLWP 3	% of newly consented EfW projects with local heat utilisation	Reduce carbon emissions from EfW by recovering waste heat	100% of newly consented EfW projects to include heat network plans	Planning register; EA permits; DM teams	LPAs, local energy providers, waste industry, developers, EA
15	WLWP 1	Number of railheads / wharves safeguarded for waste transport	Support low-carbon waste transport (rail/water freight)	No net loss of rail/water freight capacity for waste purposes unless associated waste use lost.	Planning register; EA permits; DM teams	LPAs, transport authorities (Network Rail, PLA), WLWA, GLA, developers
16	WLWP 3; WLWP 4	Non-biogenic gaseous carbon emissions emitted as part of a waste management process	Reduce carbon emissions from waste processing	Annual reduction in non-biogenic gaseous carbon emissions that are emitted as part of waste processing operation e.g. EfW.	Annual EA permit monitoring data	LPAs, WLWA, Waste Industry, EA

Strategic Objective 4: Deliver High Quality Waste Facilities (Protect and Enhance the Environment and Communities)

Ref.	Policy	Indicator	Purpose	Target	Data Sources	Delivery Responsibility
17	WLWP 4	New waste facilities with low-emission vehicle measures and traffic management plans (%)	Control and mitigate impacts from waste vehicles.	100% of new waste facility permissions include measures to control, reduce and mitigate impacts from vehicles	Planning register (conditions/obligations); operator fleet data	LPAs; waste operators; WLWA; local highways authorities
18	WLWP 4; WLWP5	Number of serious (Category 1 or 2) pollution incidents and statutory nuisance incidents at waste management sites (per year)	Avoid unacceptable adverse impacts on environment and communities (e.g. pollution, nuisance).	0 serious and statutory nuisance incidents per year.	EA incident reports; EA permit compliance data; local authority environmental health records	EA; waste site operators; LPAs

Strategic Objective 5: Ensure sufficient capacity of the right type in the right place so that unavoidable residual waste produced is managed safely and effectively.

Ref.	Policy	Indicator	Purpose	Target	Data Sources	Delivery Responsibility
19	WLWP 5	Type of waste managed by landfill or EfW or export as RDF	Management of waste up the waste hierarchy	Only waste which cannot be managed by other means is managed by landfill, EfW or as RDF.	WDI; Wastedataflow	LPAs, WLWA, Waste Industry, EA

Appendix 2: List of Safeguarded Waste Sites

Notes: Lawful over time' or 'Lawful waste use' entry is based on evidence available to the relevant LPA at the time and is not intended to confer formal confirmation of lawfulness of the use. This would need to be confirmed through submission of an application for an CLEUD or a planning application.'

Abbreviations

- CLEUD = Certificate of Lawful Existing Use or Development

MRS = Metal Recycling Site

- WTS = Waste Transfer Station[38]

[38] Site type based on Environment Agency permitting categories; sites identified as waste transfer may be conducting treatment as well.

London Borough of Brent: 10 sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
B04	Neasden Sidings, Drury Way, Wembley	Quattro Limited obo WRG (Midlands) Limited	Transfer	250,000	CDEW (Excavation)	Lawful waste use	2018	y
B05	Atlas Road Wembley	O'Hara Bros. Aggregates Limited	Non-haz Treatment	24,180	CDEW	CLEUD	2023	
B06	Unit 4, Second Way, Wembley	HAWK Rubbish Clearance Limited	Non-haz Treatment	65,575	CDEW	Temporary Planning	2015	
B07	SRC Aggregates Wembley Depot	Sewells Reservoir Construction Limited	Transfer	66,596	CDEW	Lawful waste use	2022	
B10	Unit 28, Fourth Way WTF	Brent Oil Contractors Limited	Transfer	4,903	Hazardous	CLEUD	2007	

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
B12	Unit 2, Hannah Close	LondonEnergy Ltd	Treatment	185 ,000	HIC	Permanent Permission	2021[39]	
B13	Alperton Lane Waste Transfer Station	Sortera	Treatment	300,000	CDEW/HIC/Haz	Permanent Permission	2015	
B14	Brent Transfer Station, Alperton Lane	Veolia ES (UK) Ltd	Transfer	365,000	HIC	Permanent Permission	2016	
B15	Wembley Transfer Station & Recycling Facility	Biffa Waste	Transfer	150,000	HIC	CLEUD	2002	

[39] Site was previously permitted.

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
B16	off Great Central Way, Neasden,	L & B Haulage & Engineering Contractors Ltd	Transfer	16,696	CDEW	Lawful over time	1998	

London Borough of Brent and OPDC: 3 Sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
B01	Twyford WTS Abbey Road	West London Waste Authority	WTS	30,003	LACW	CLEUD	1993	
B02	100 Twyford Abbey Road[40]	Urban Prop 8 S.A.R.L	WTS	91,492	CDEW	Permanent Permission	Surrendered	
B08	Willesden F Sidings Rail Freight Terminal	Cappagh Public Works Limited	Transfer	10,400	CDEW (Excavation)	Permanent Permission	2018	y

[40] Site has planning permission for alternative use. Site E20 has been identified as compensatory provision but the process to secure provision has still to be completed, so site remains safeguarded until such time as it is.

London Borough of Ealing: 14 Sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
E01	Greenford Depot Reuse & Recycling Centre	Ealing Council	HWRC	13,268	HIC (LACW)	Permanent Permission	1977	
E02	Acton Circular Economy Hub	SUEZ Recycling & Recovery UK Ltd	HWRC	55	HIC (LACW)	Permanent Permission	1994	
E05	WTS Station Approach Greenford	360 Waste Limited	Non-haz Treatment	10,097	CDEW & HIC	Permanent Permission	2023	
E06	British Rail Goods Yard, Greenford	Link2london Ltd	Transfer	131,985	CDEW & HIC	Permanent Permission	2003	
E07	Horn Lane Waste Transfer Station	Quattro (UK) Limited	Transfer	17,618	CDEW & HIC	CLEUD	1993	

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
E08	163-165 Brent Rd, International Trading Estate	Link2london Ltd (formerly J Simpson Waste Management)	Transfer	40,699	CDEW	Temporary Permission to 2027	2024	
E09	Stone Terminal (aka Western Regions Good Yard), 205 Horn Lane	Holcim UK Ltd (formerly Aggregate Industries UK Limited)	Non-haz Treatment	79,777	CDEW	Lawful over time	2005	
E12	London Auto Parts Alperton Lane	London Auto Parts Limited	MRS	14,013	Hazardous	CLEUD	2003	

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
E14	Station Approach, Oldfield Lane North, Greenford (Haulage World WTS)	Link2london Ltd	Treatment	46,516	CDEW & HIC	Permanent Permission	2022	
E15	Greenford Depot (Waste Transfer Station)	Ealing Council	Treatment	30,046	HIC (LACW)	Permanent Permission	1992	
E16	Oldfield Lane North, Greenford Ocean Estate Distribution Centre	GXO Logistics FST Limited	Transfer	4,399	HIC	Temporary Permission to 2026	2023	
E18	Colville Rd	Elis UK Ltd	Transfer	1,000	Hazardous	Permanent Permission	2024	
E19	Unit 42a Sheraton Business	Autofleet Salvage Limited	MRS	2,500	Hazardous	Lawful over time	2015	

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
	Park,							
E20	Land off Collet Way[41]	Wards of London Properties Ltd (Rail Logistics Ltd)	Non-haz Treatment	33,117 (after B02 deducted)	CDEW/HIC	Permanent Permission	2024	

[41] Site provided as compensatory capacity for release of B02. Total capacity 150,000tpa.

London Borough of Ealing and OPDC : 2 sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
E11	Willesden Euro Terminal	Costain Limited (Formerly Skanska Construction UK Limited)	Transfer	600,000	CDEW (Excavation)	Deemed consent under HS2 Act 2017	2016	y
E13	First Mile Recycling Facility	First Mile Limited	Treatment	75,000	HIC	Permanent Permission	2017	

London Borough of Harrow: 2 Sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
HA01	Forward Drive CA Site,	Harrow Council	WTS	30,757	HIC (LACW)	Permanent Permission	1990	
HA02	151 Pinner View	Harrow Breakers	MRS	2,247	Hazardous	CLUED	2005	

London Borough of Hillingdon : 21 Sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
HI01	New Years Green Lane CA Site & WTS	Hillingdon Council	WTS	68,,057	HIC (LACW)	Permanent Permission	1989	
HI02	Airside Waste Sweepings Treatment Facility	Heathrow Airport Ltd	Treatment	70,000	HIC/Haz	Lawful over time	2015	
HI03	New Years Green Lane	B F A Recycling Limited	MRS	57,424	HIC	Lawful over time	2012	
HI04	WTS, Civic Way, Ruislip	B & K Environmental Services Limited	WTS	250,000	CDEW	Lawful over time	2007	
HI06	Land off Holloway Lane Harmondsworth	Foley Haulage Limited	Treatment	27,209	CDEW	CLEUD	2020	

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
HI07	GK Depot, Trout Road	Recycling With Skips Limited	Treatment	275,000	CDEW	CLEUD	2018	
HI08	Old Stockley Road, West Drayton	Hanson Quarry Products Europe Limited (formerly West Drayton Aggregates)	Treatment	35,077	CDEW	Lawful over time	2015	y
HI09	Holloway Lane Materials Recycling Facility	Powerday Plc	Treatment	63,758	CDEW/HIC	CLEUD	2002	
HI13	Skip Lane, Harvill Road	Sortera Limited (formerly Uxbridge Skip & Recycling Ltd)	Treatment	113,229	CDEW	Permanent Permission	1991	

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
HI15	Skip Lane, Harvill Road,	Thames Materials Limited (formerly Pioneer Concrete)	Treatment	766,031	CDEW (Excavation)	Lawful over time	2015	
HI16	Unit 1 Wallingford Road Recycling Facility	Uxbridge Recycling Limited (formerly A&A Recycling Ltd)	Treatment	15,760	CDEW	Permanent Permission	2012	
HI17	Crows Nest Farm	Country Compost Limited	Compost	24,900	HIC	Permanent Permission	2005	
HI18	High View Farm	West London Composting Limited	Compost	119,790	HIC	Permanent Permission	1995	
HI19	Hillingdon Clinical Waste Incinerator	Medisort Ltd	Incin	8,000	HIC/ Haz		2021	
HI20	Cranford Lane WTS, Heathrow	Heathrow Airport Limited	WTS	525	HIC	Lawful over time	1981	

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
HI21	Waybeards Farm, Hill End Road, Harefield	F J Heppelthwaite Solutions Limited (formerly Hep Oils)	WTS	6,451	HIC	Lawful over time	2008	
HI24	Heathrow Depot	FM Conway	Treatment	193,490	HIC/ Haz/ CDEW	Permanent Permission	2015	
HI25	Central Depot Harlington Road	Hillingdon Council	WTS	9,500	HIC (LACW)	Permanent Permission	2023	
HI27	Unit 1 & 2 Pump Lane Industrial Estate	Personnel Hygiene Services Limited	WTS	90,976	HIC	Lawful over time	1999	
HI28	Hayes Transfer Station Rigby Lane	Suez Recycling & Recovery UK Ltd	WTS	100,000	HIC	Permanent Permission	1993	
HI29	Victoria Road WTS	Suez Recycling & Recovery UK Ltd	WTS/RDF	250,047	HIC (LACW)	Permanent Permission	2014	y

London Borough of Hounslow: 10 Sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
HO01	Space Waye C A Site	Hounslow Council	WTS	20,084	HIC (LACW)	Permanent Permission	2002	
HO2	Southall Lane Western International Market	Quattro (UK) Limited	Treatment	64,347	HIC/CDEW	Temporary Permission to 2027	2018	
HO3	St Albans Farm Recycling Facility	Ron Smith (Recycling) Limited	MRS	65,415	CDEW	Permanent Permission	1993	
HO04	Norris House	Globalparts-(UK) Limited	MRS	1,128	Hazardous	Permanent Permission	2019	
HO05	Mayer Parry, Brentford	European Metal Recycling Limited	MRS	74,999	LACW	Permanent Permission	1998	
HO07	Brentford Aggregate Materials Recycling Facility	Day Group Limited	Treatment	555,000	CDEW/HIC	CLEUD	2015	y

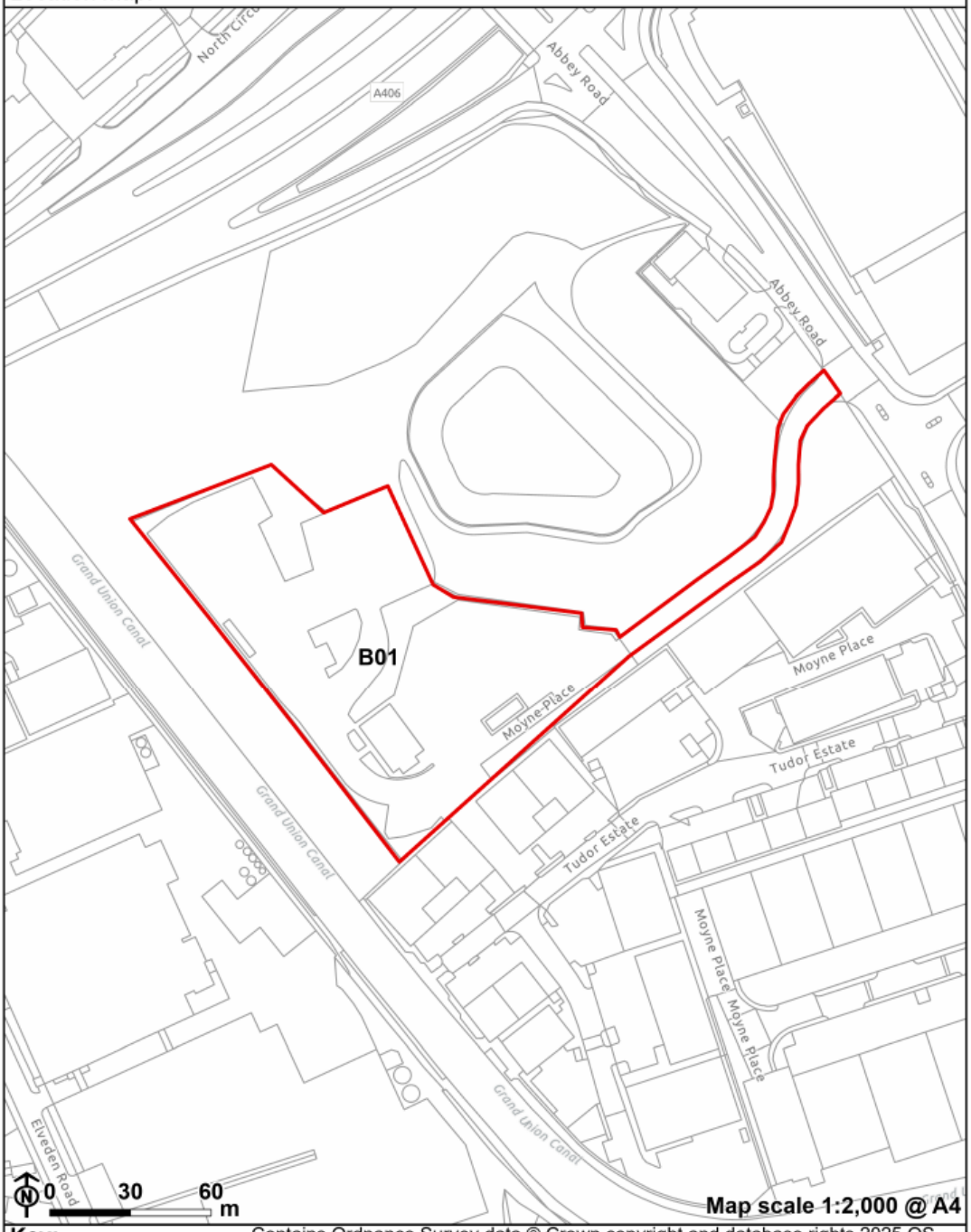
Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
HO09	ATS Building, Amberley Way	Rubber Recycling Solutions Limited	Treatment	12,000	HIC	Lawful over time	2023	
HO11	Southall Lane Depot	Lampton Recycle 360 Limited	Treatment	30,000	HIC (LACW)	Permanent Permission	2017	
HO13	Isleworth Site, Fleming Way Trading Estate	Citron Hygiene (UK) Limited	WTS	687	HIC/Haz	Permanent Permission	2020	
HO14	Transport Avenue WTS	Suez Recycling & Recovery UK Ltd	WTS/RDF	195,000	HIC (LACW)	Permanent Permission	1993	y

London Borough of Richmond upon Thames: 4 Sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
R01	Townmead C A Site	Richmond Upon Thames Council	WTS	21,584	HIC (LACW)	Permanent Permission	1996	
R02	The Royal Botanic Gardens, Kew	The Royal Botanic Gardens, Kew	Compost	5,000	HIC	Lawful over time	2012	
R03	Central Depot, Langhorn Drive	Richmond Upon Thames Council	WTS	26,702	HIC (LACW)	Permanent Permission	2013	
R04	Arlington	Sharpes Oil	Treatment	13,404	Hazardous	CLEUD	Surrendered in 2020	

Appendix 3: Maps of Safeguarded Waste Sites

Site Name: Site Ref:	Twyford Waste Transfer Station (WLWA) B01
Borough:	Brent
Location map:	

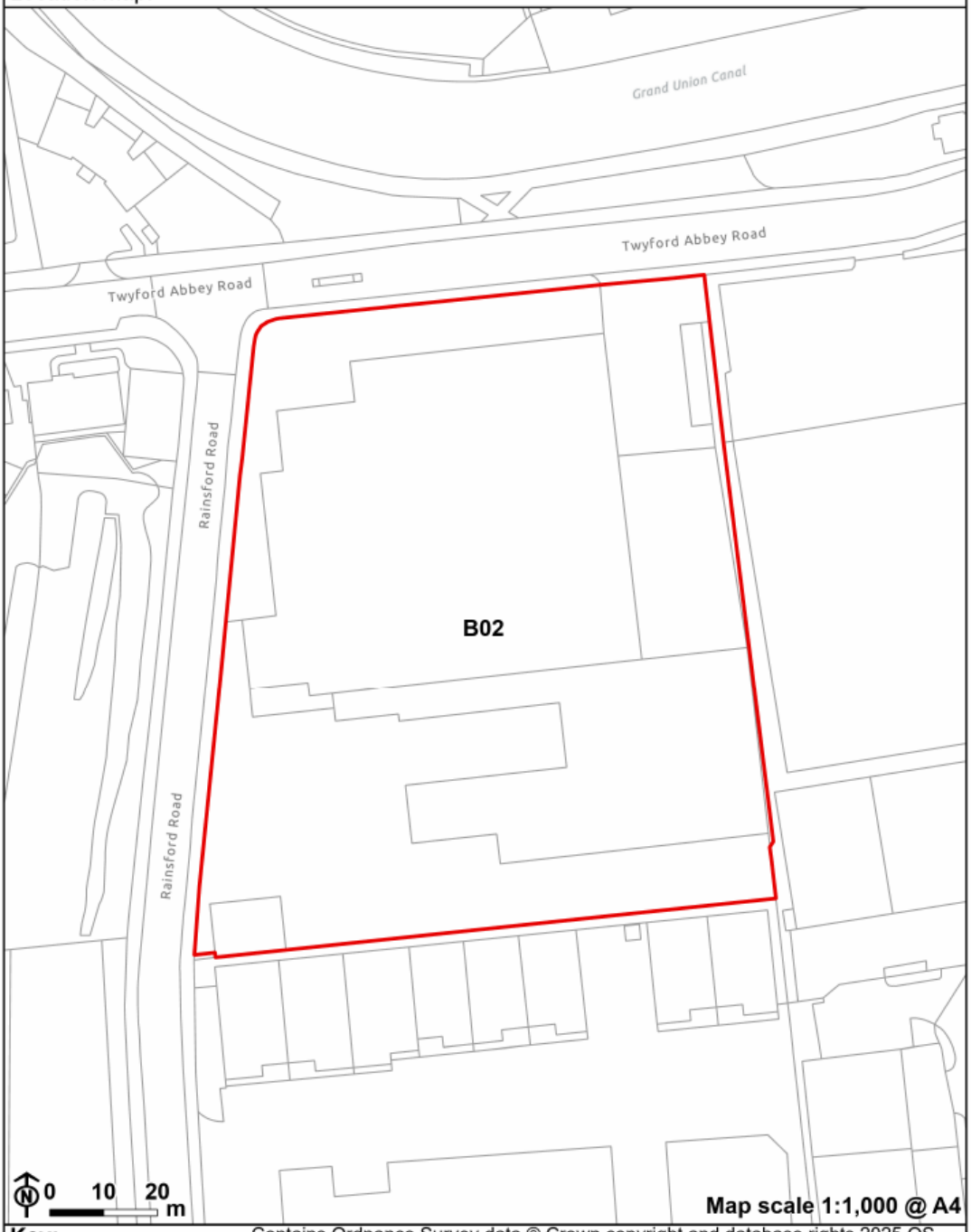


Key:

Site boundary

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Site Name: Site Ref:	Bridgemarts Ltd, 100 Twyford Abbey B02
Borough:	Brent
Location map:	

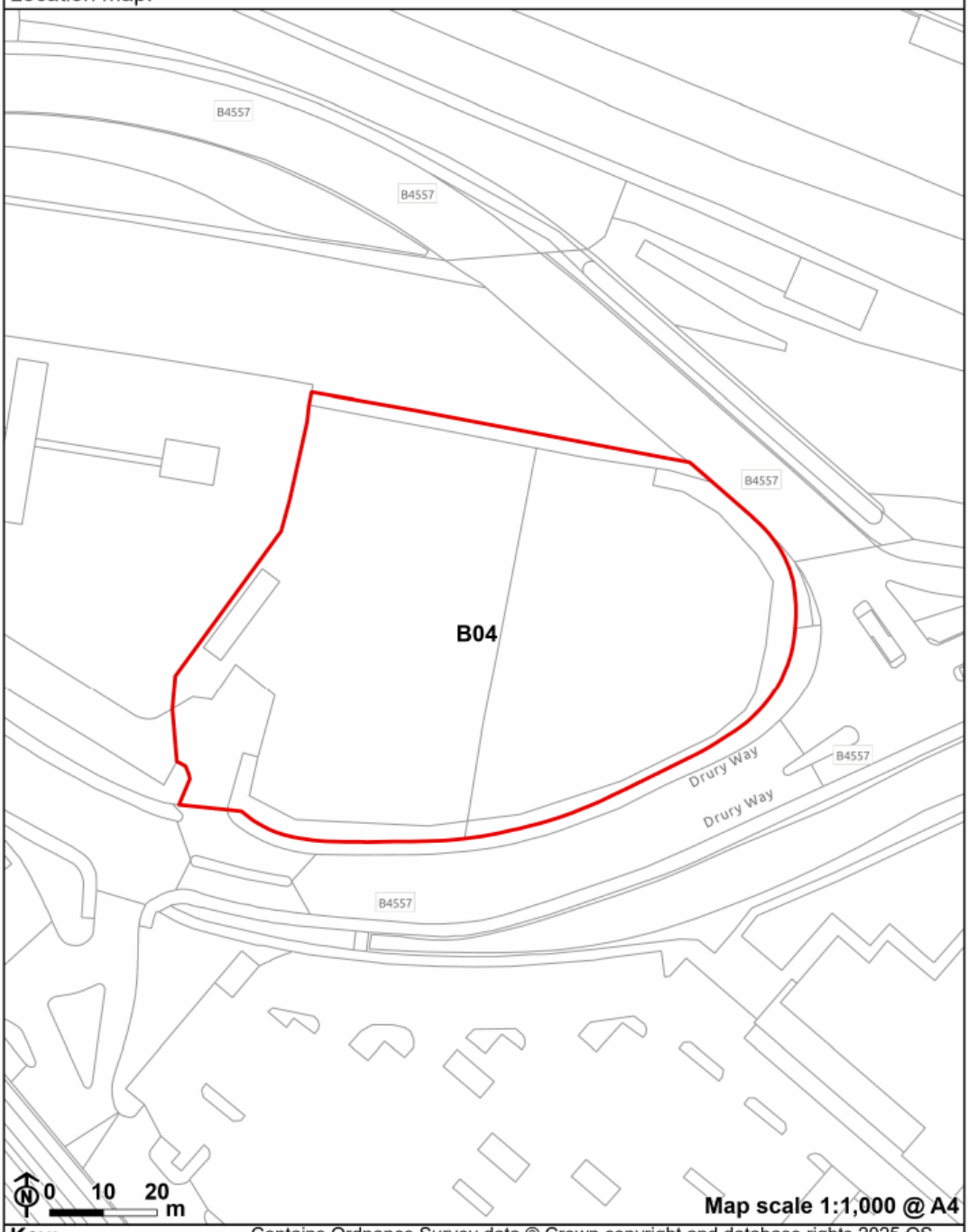


Key:

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Site Name: Site Ref:	Neasden Sidings, Drury Way, Wembley B04
Borough:	Brent
Location map:	

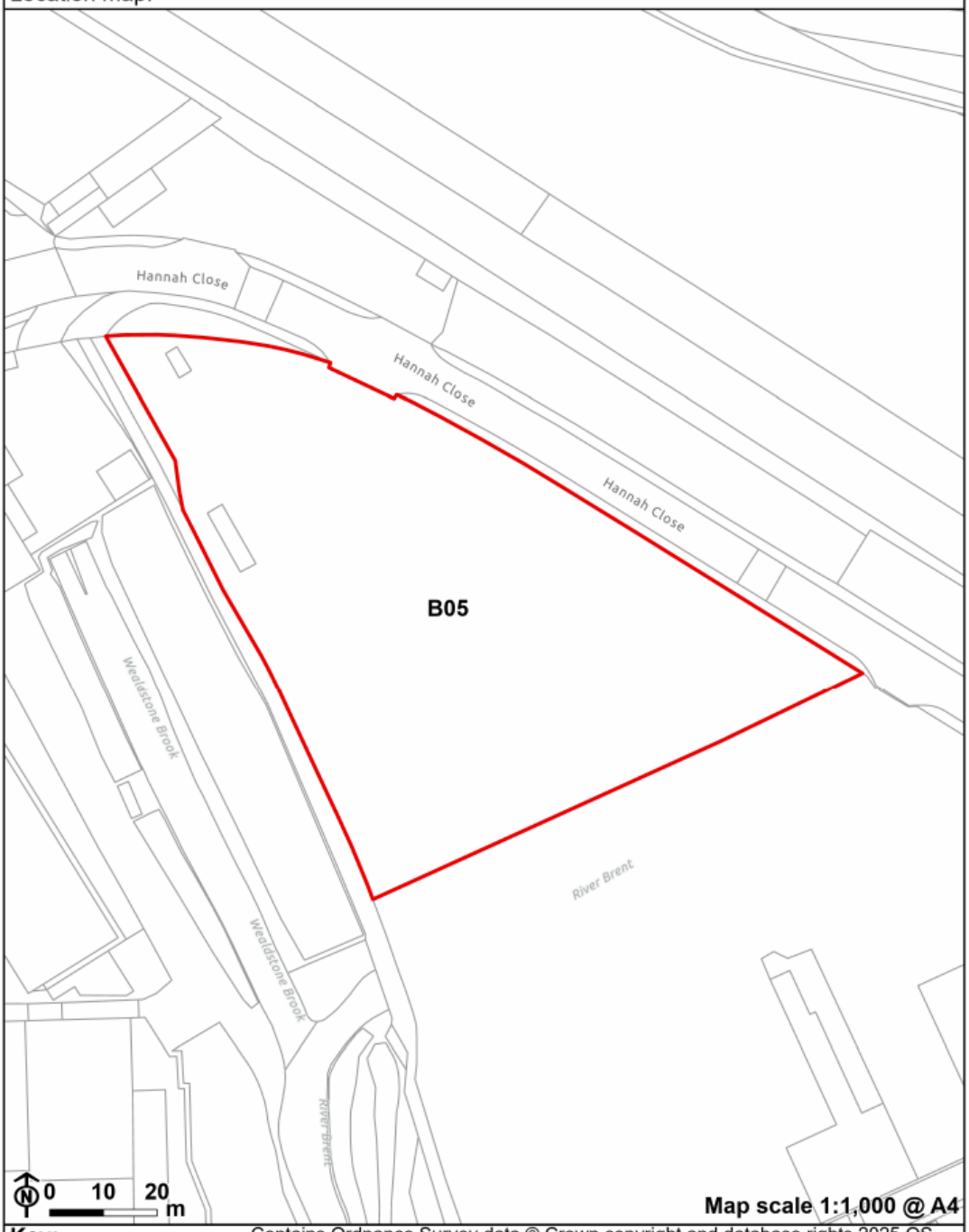


Key:

Site boundary

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Site Name: Site Ref:	Atlas Road Wembley B05
Borough:	Brent
Location map:	

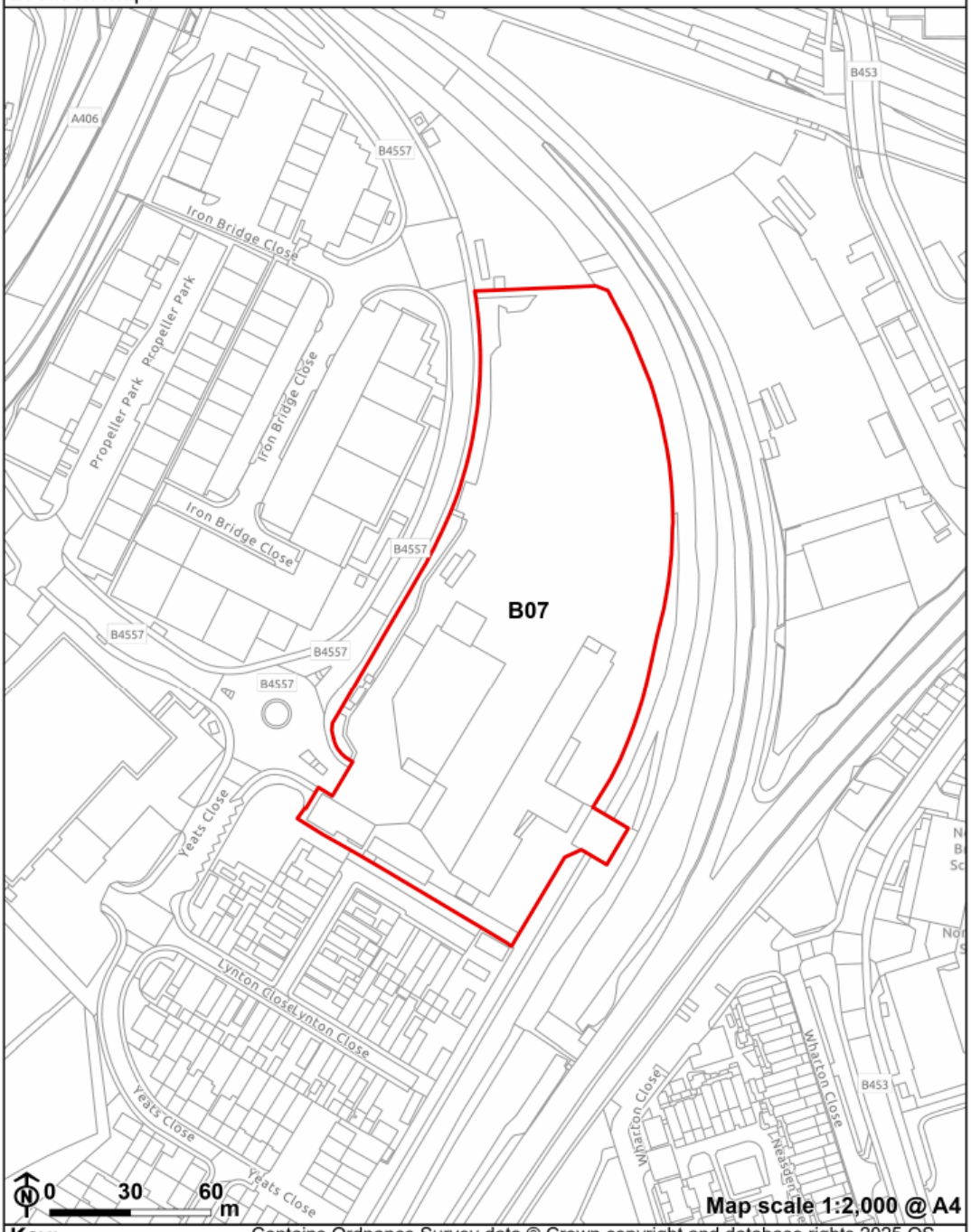


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Site Name: Site Ref:	SRC Aggregates Wembley Depot B07
Borough:	Brent
Location map:	

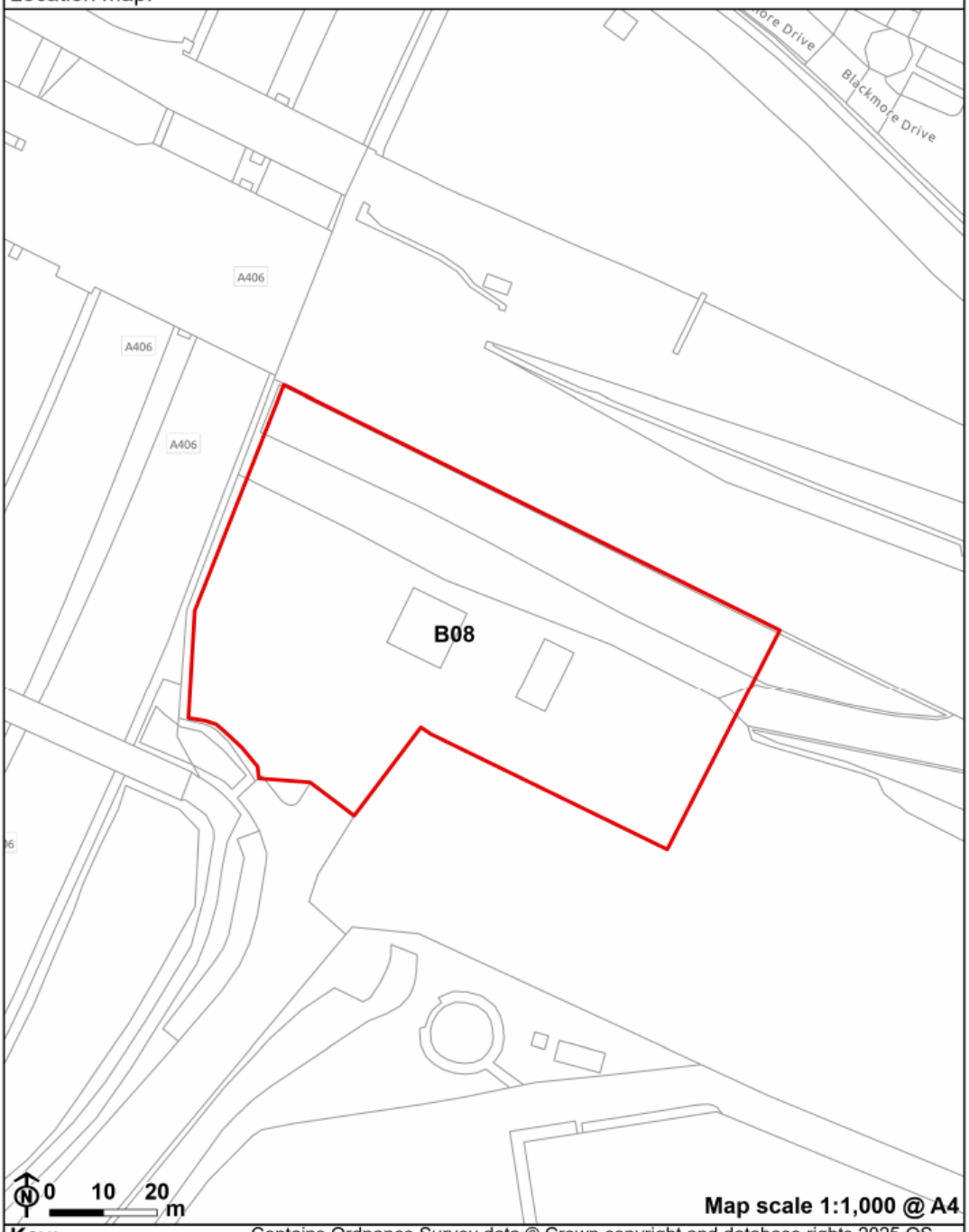


Key:

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Site Name: Site Ref:	Willesden F Sidings Rail Freight Terminal B08
Borough:	Brent
Location map:	

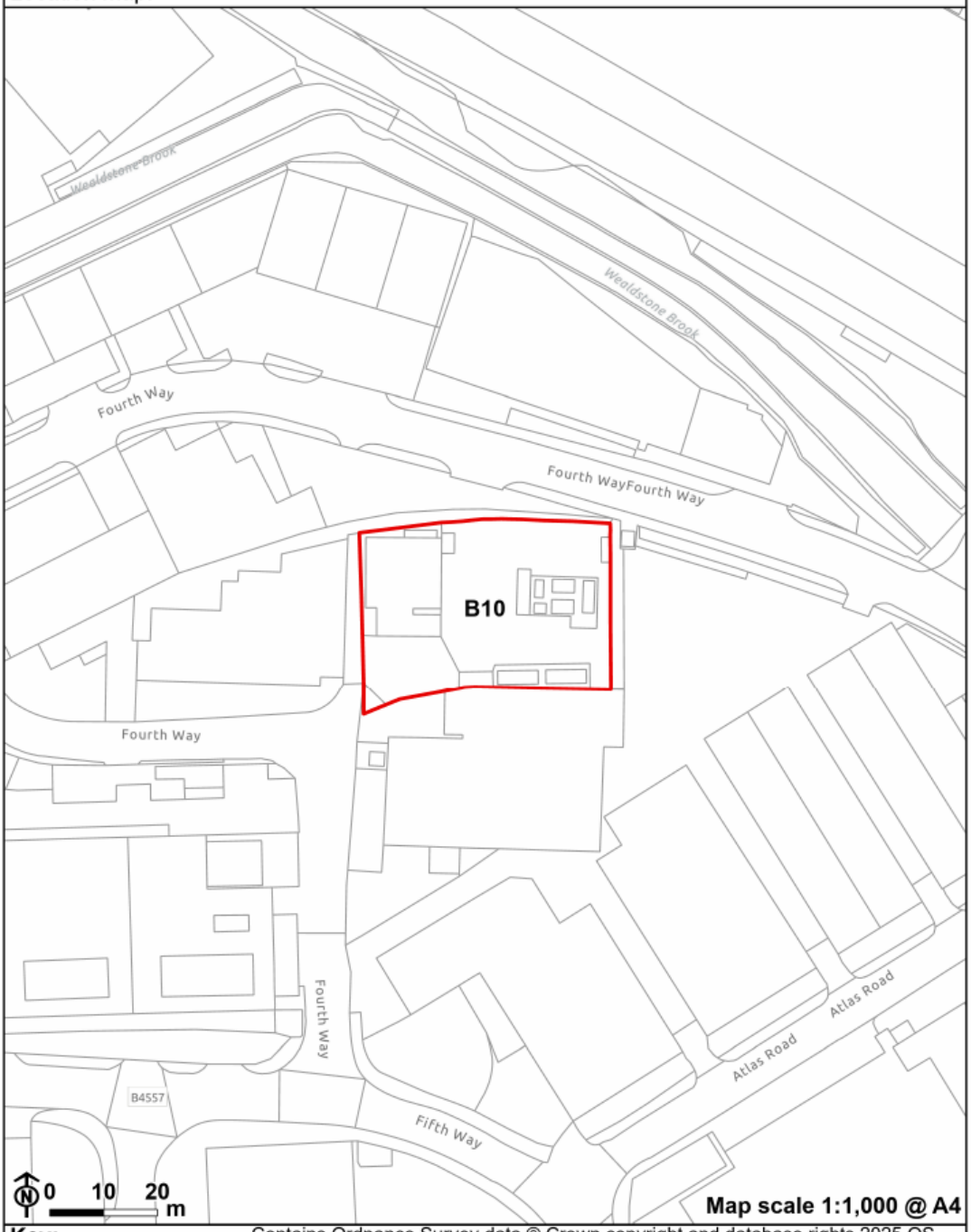


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Site Name: Site Ref:	Brent Oil, Fourth Way B10
Borough:	Brent
Location map:	

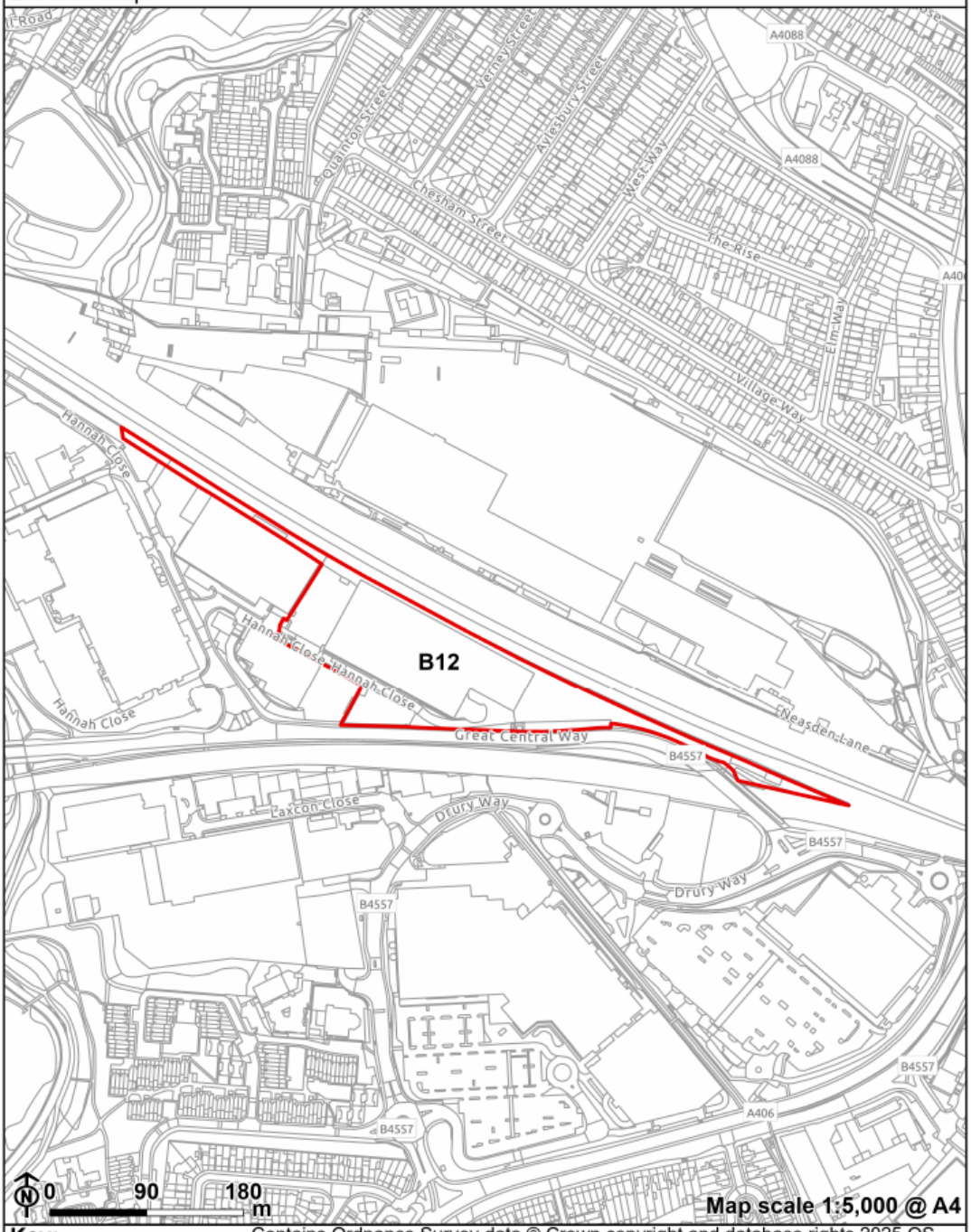


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Site Name: Site Ref:	Unit 2, Hannah Close B12
Borough:	Brent
Location map:	

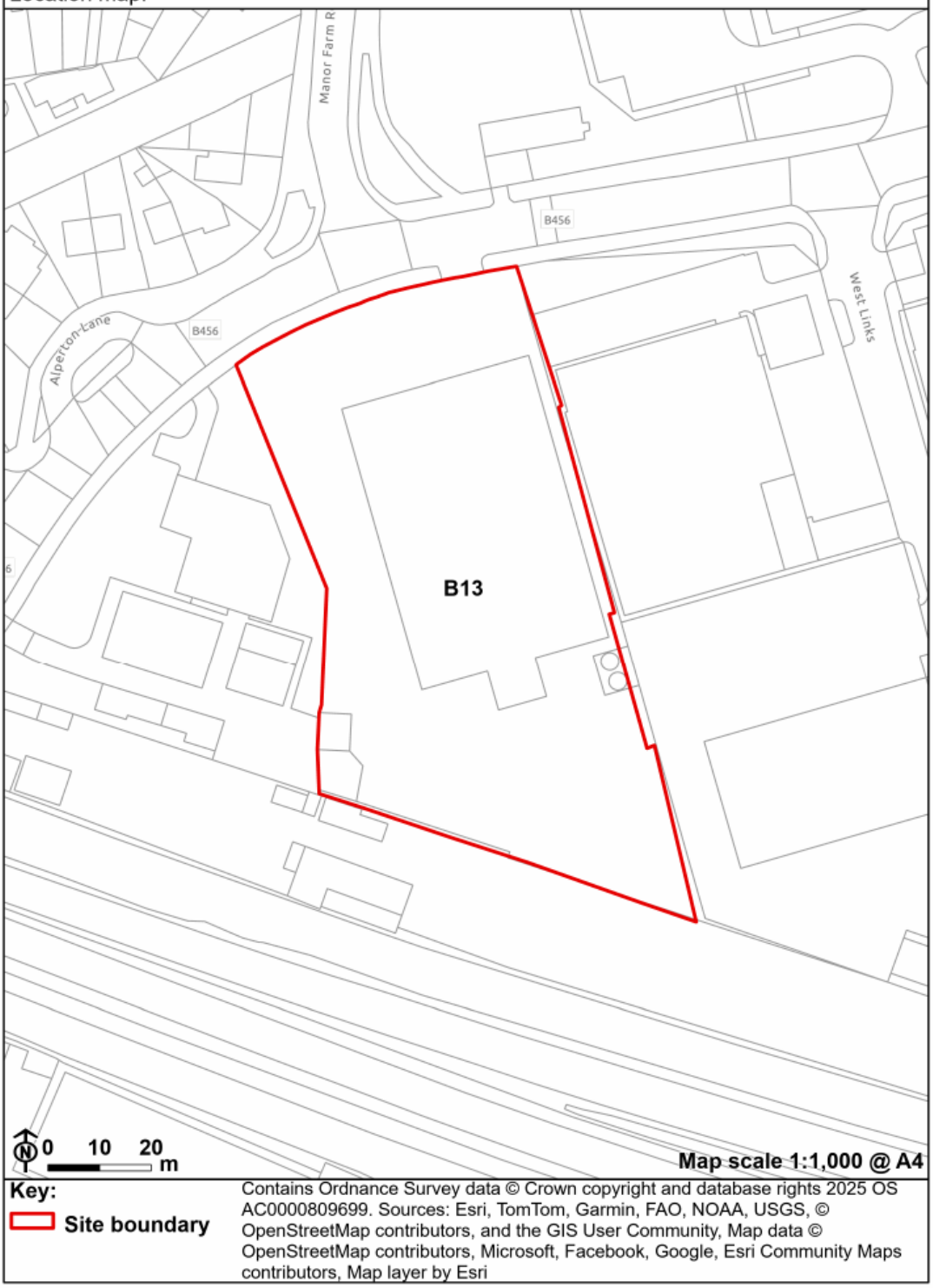


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Site Name: Site Ref:	Alperton Lane Waste Transfer Station B13
Borough:	Brent
Location map:	

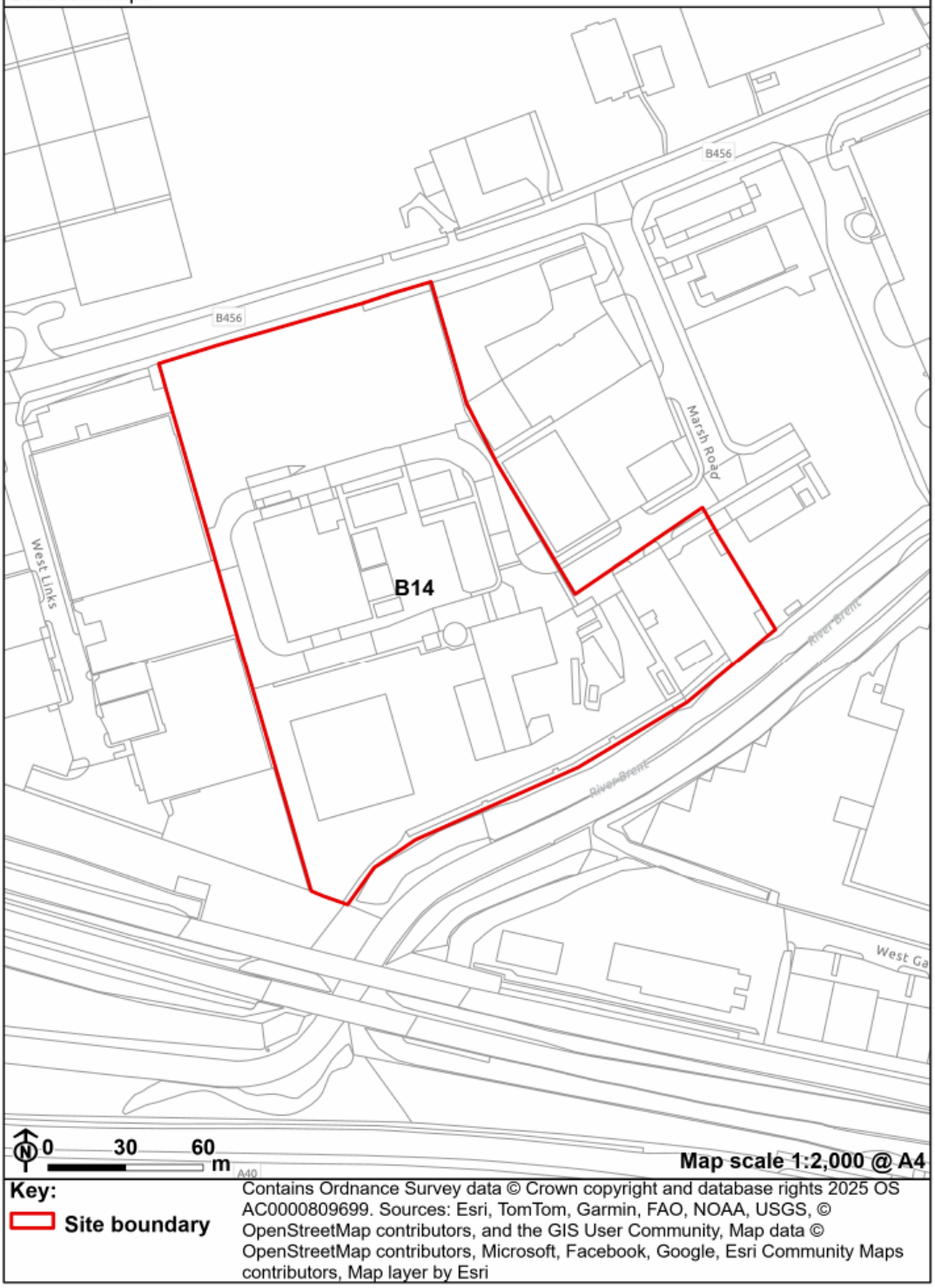


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Site Name: Site Ref:	Veolia Alperton Lane B14
Borough:	Brent
Location map:	

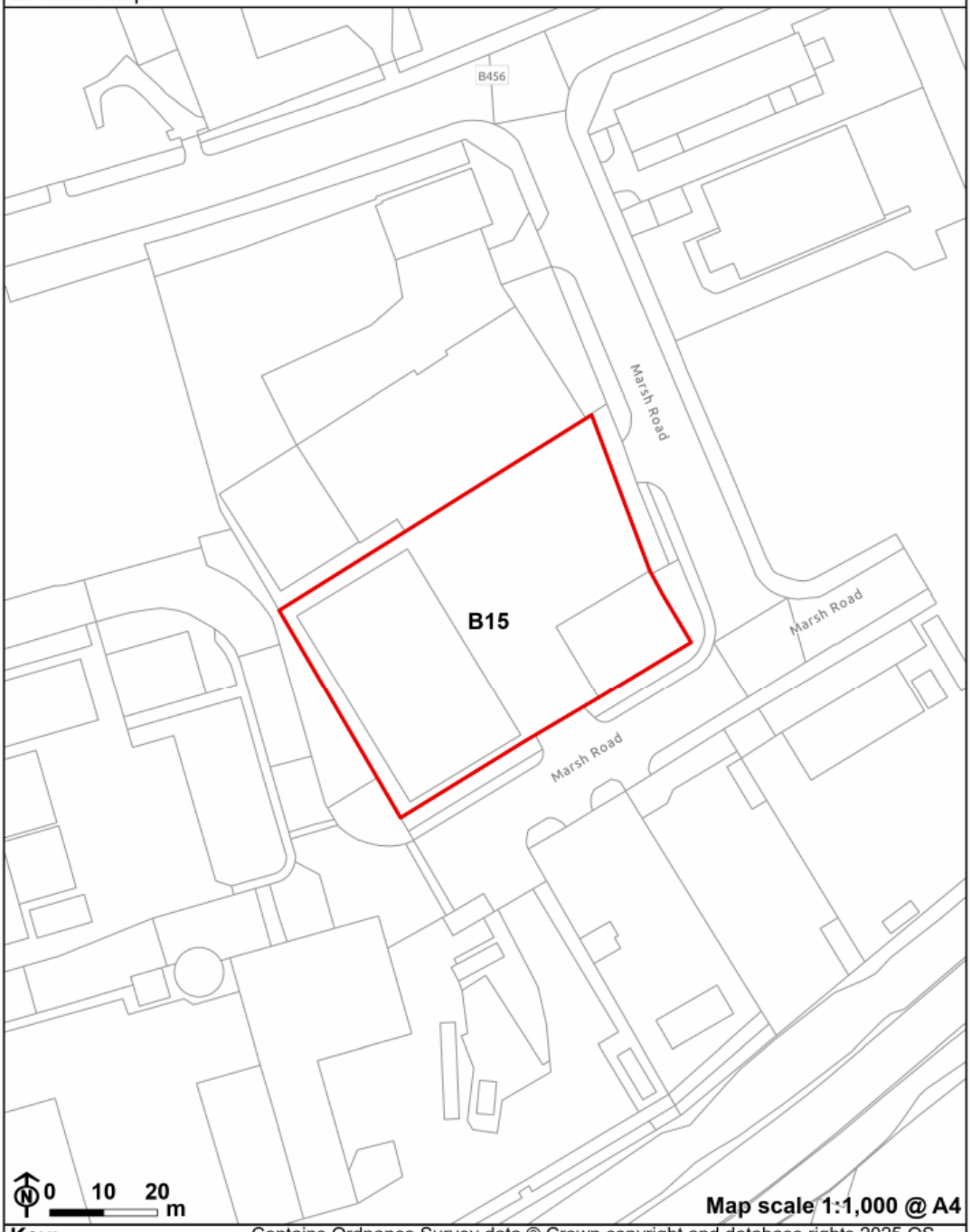


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Site Name: Site Ref:	Biffa Waste, Wembley Transfer Station B15
Borough:	Brent
Location map:	

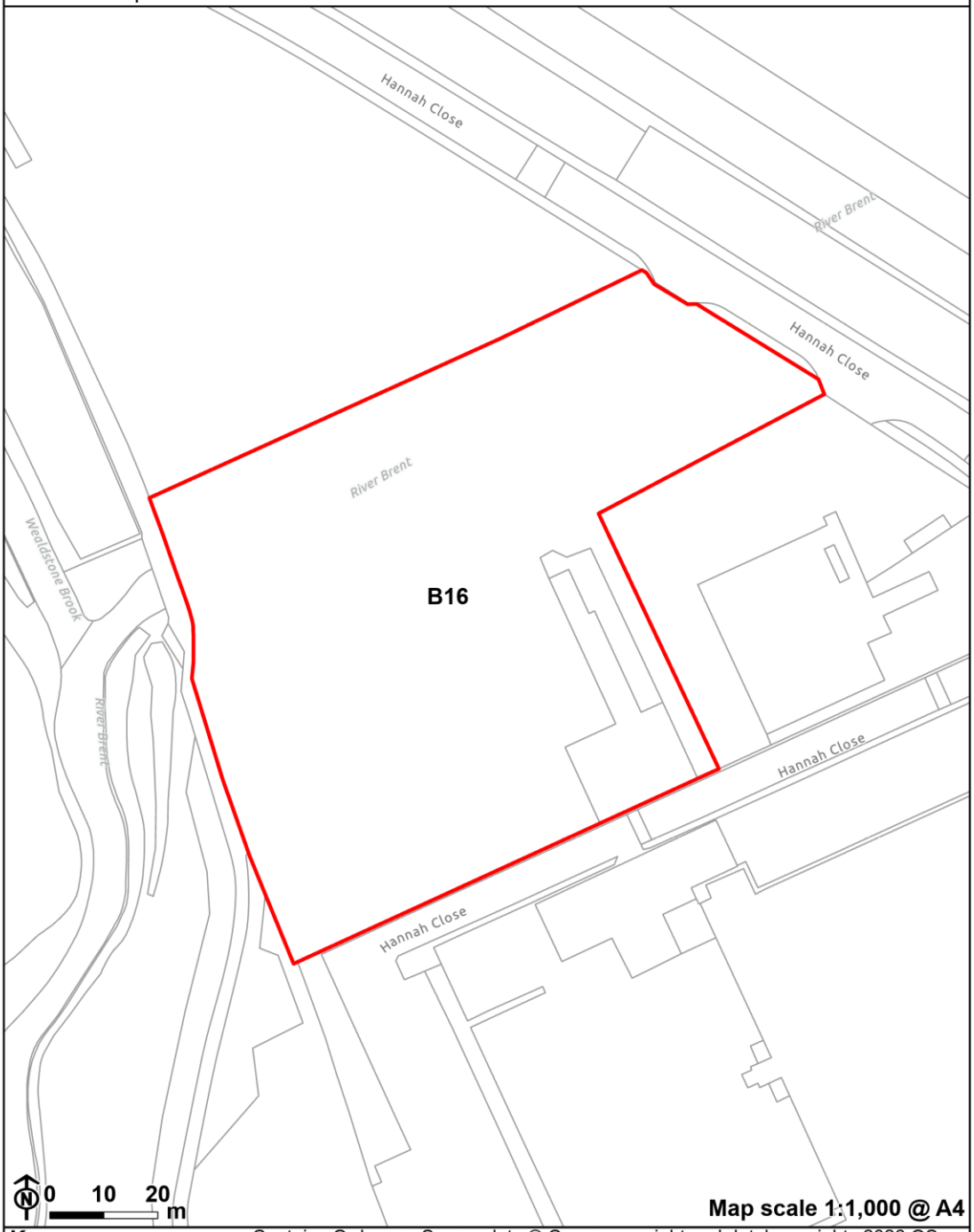


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Site boundary

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Site Name: Site Ref:	Hannah Close, off Great Central Way, Neasden B16
Borough:	Brent
Location map:	

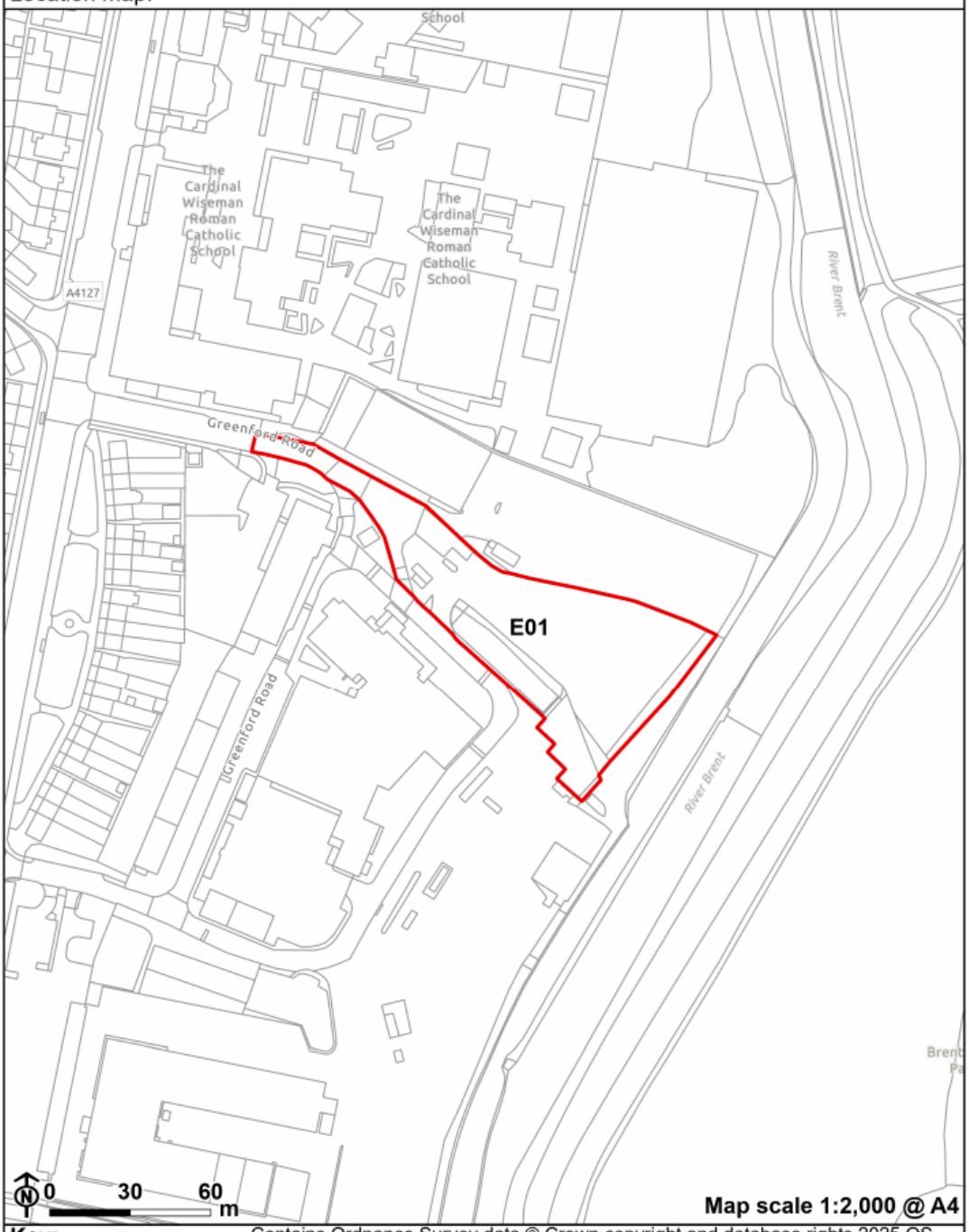


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Site Name: Site Ref:	Greenford Reuse and Recycling Centre and Depot E01
Borough:	Ealing
Location map:	

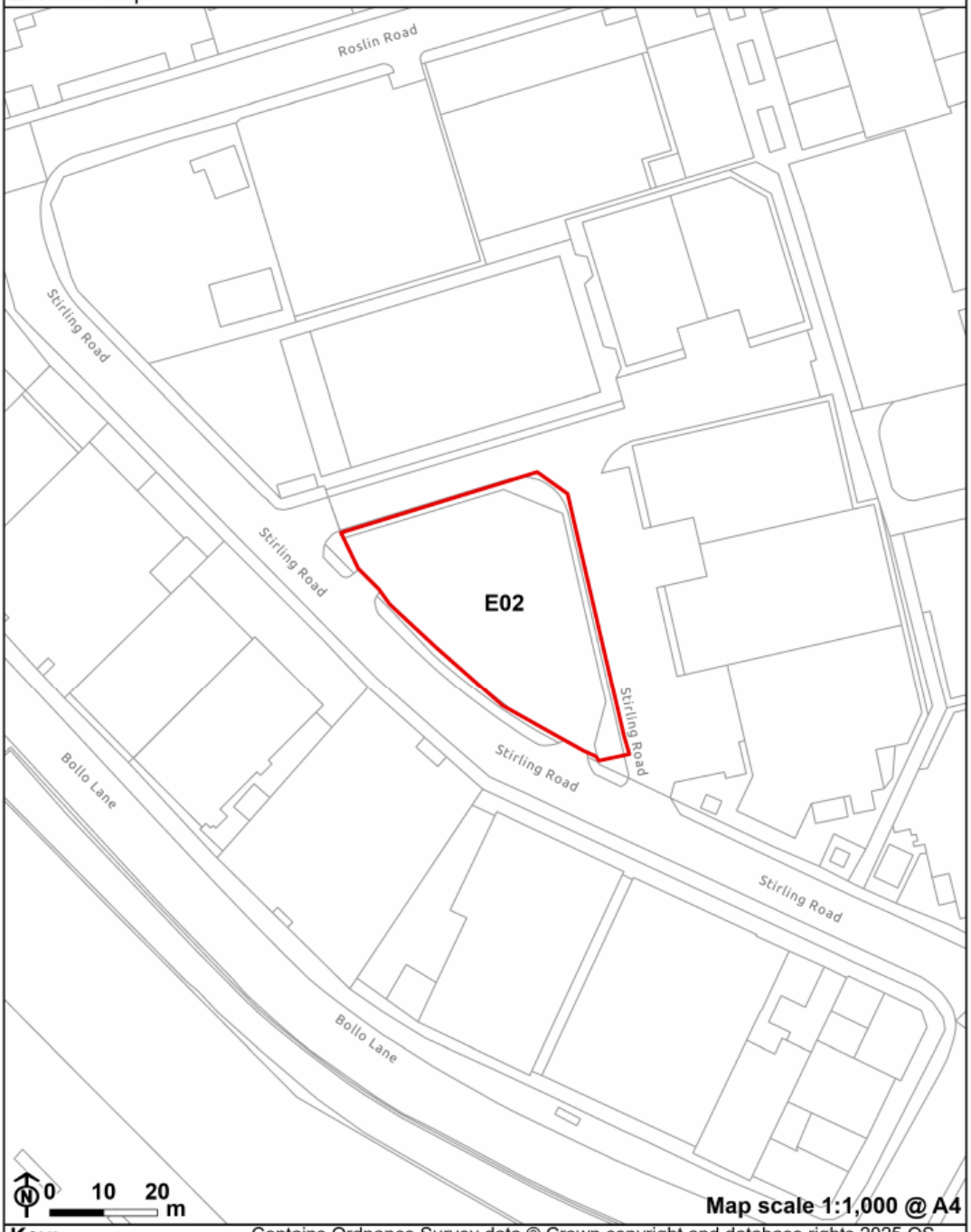


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Site Name: Site Ref:	Acton Waste and Recycling Centre E02
Borough:	Ealing
Location map:	

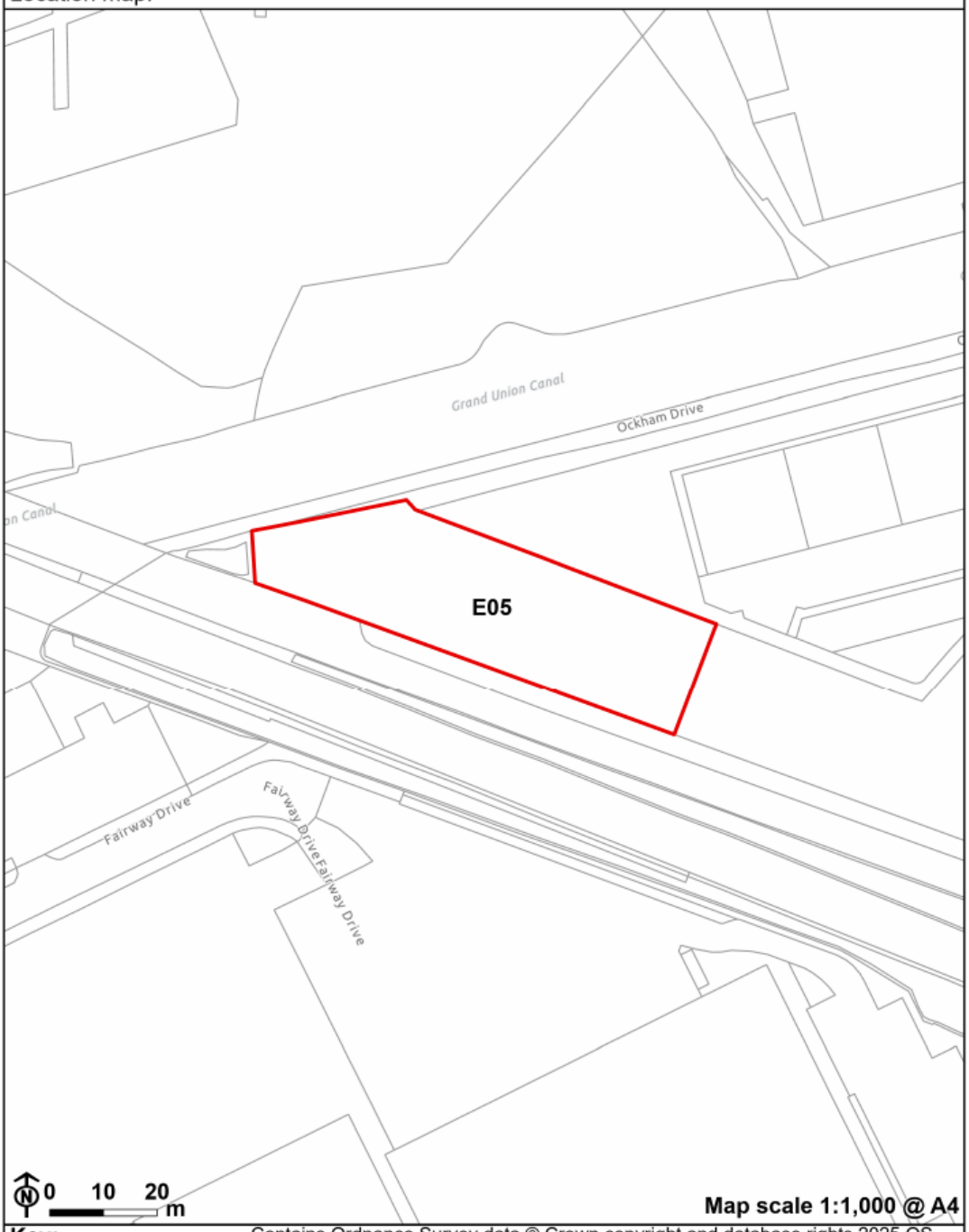


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Site Name: Site Ref:	WTS Station Approach Greenford E05
Borough:	Ealing
Location map:	

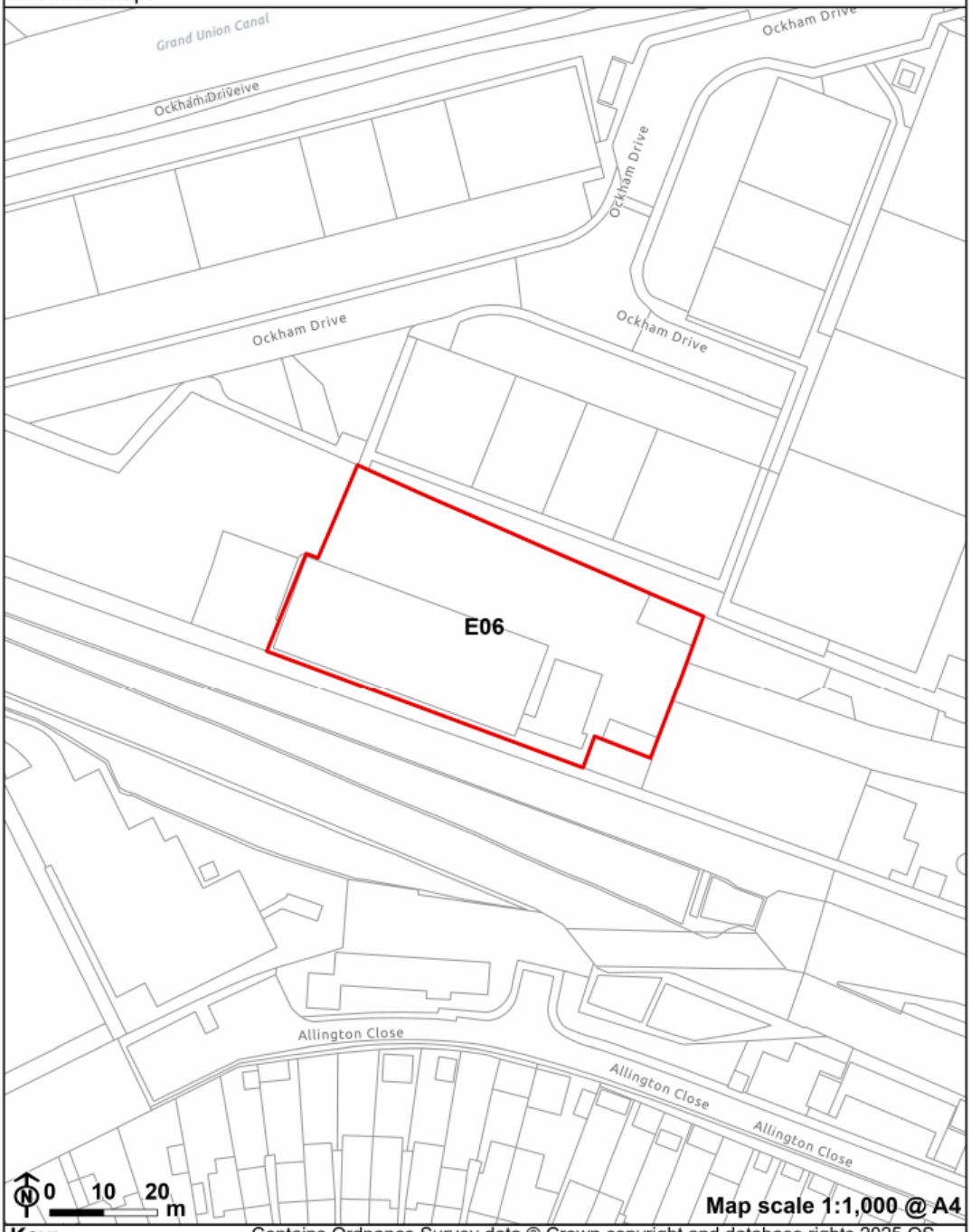


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Site Name: Site Ref:	British Rail Goods Yard, Greenford (Iver Recycling Ltd/Link2London) E06
Borough:	Ealing
Location map:	



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Site boundary

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Site Name: Site Ref:	Horn Lane Waste Transfer Station (Bridgemart Ltd/Quattro) E07
Borough:	Ealing
Location map:	

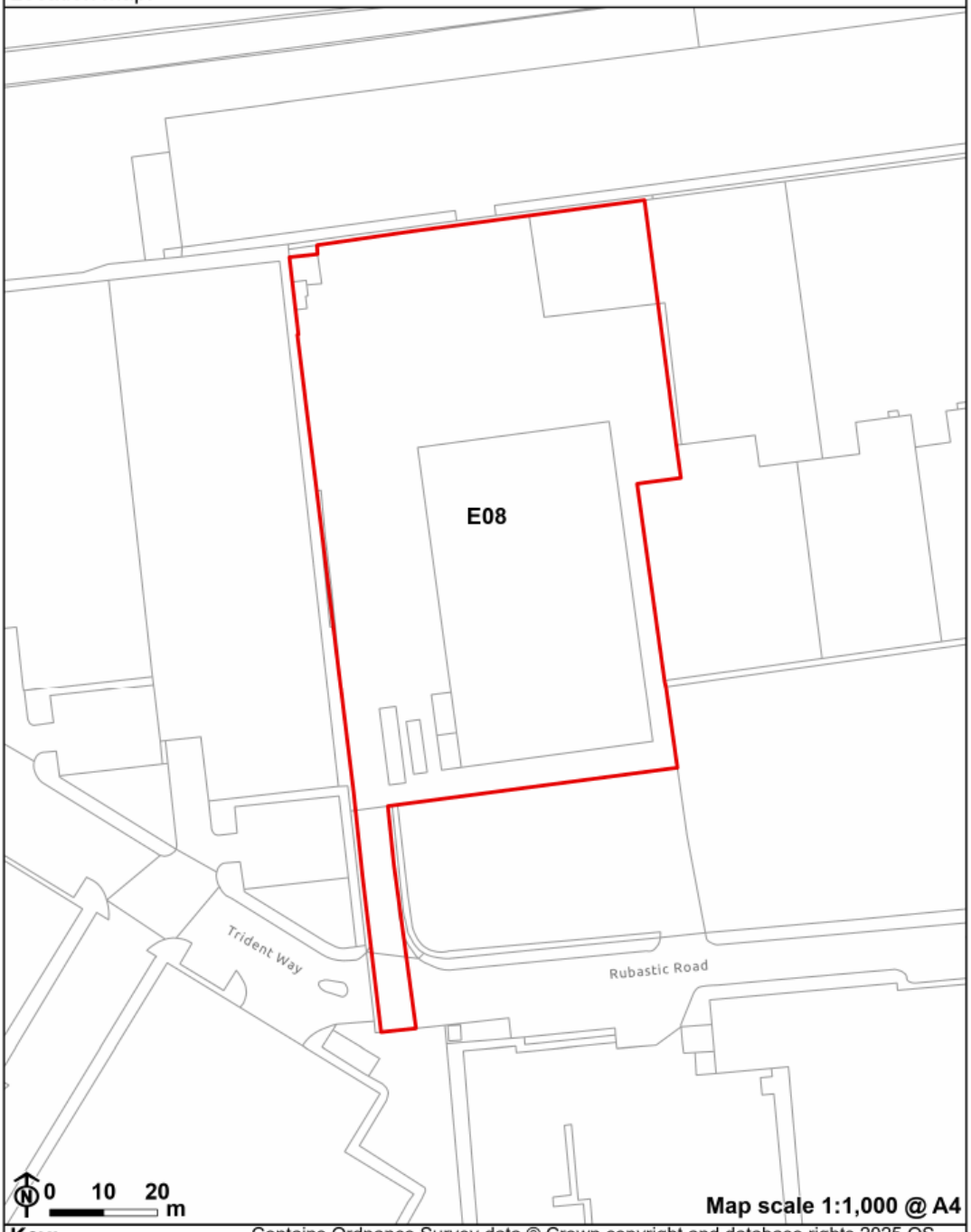


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Site Name: Site Ref:	163-165 Brent Rd, International Trading Estate E08
Borough:	Ealing
Location map:	

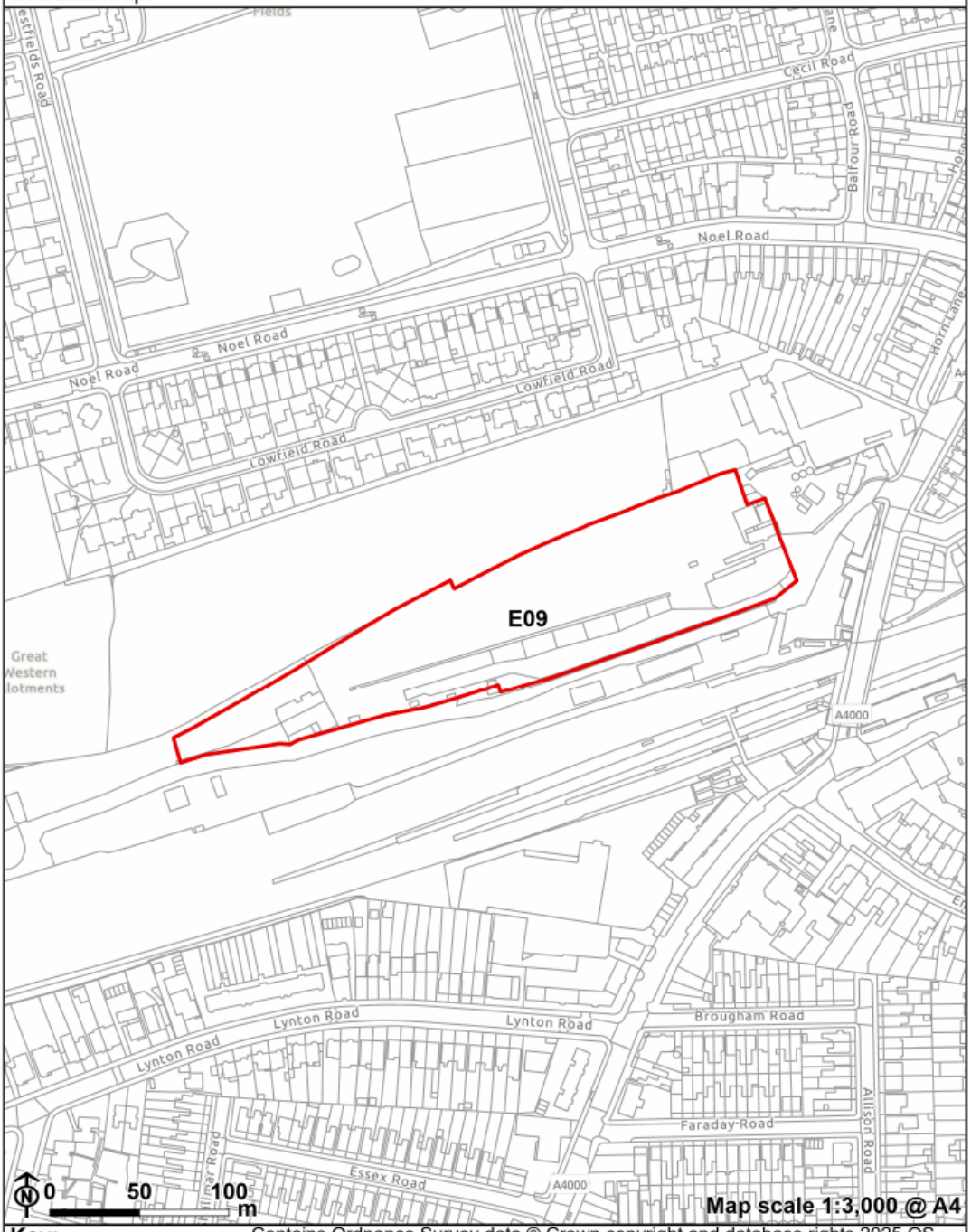


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Site Name: Site Ref:	Stone Terminal (Holcim (formerly known as AGGREGATE INDUSTRIES UK E09
Borough:	Ealing
Location map:	

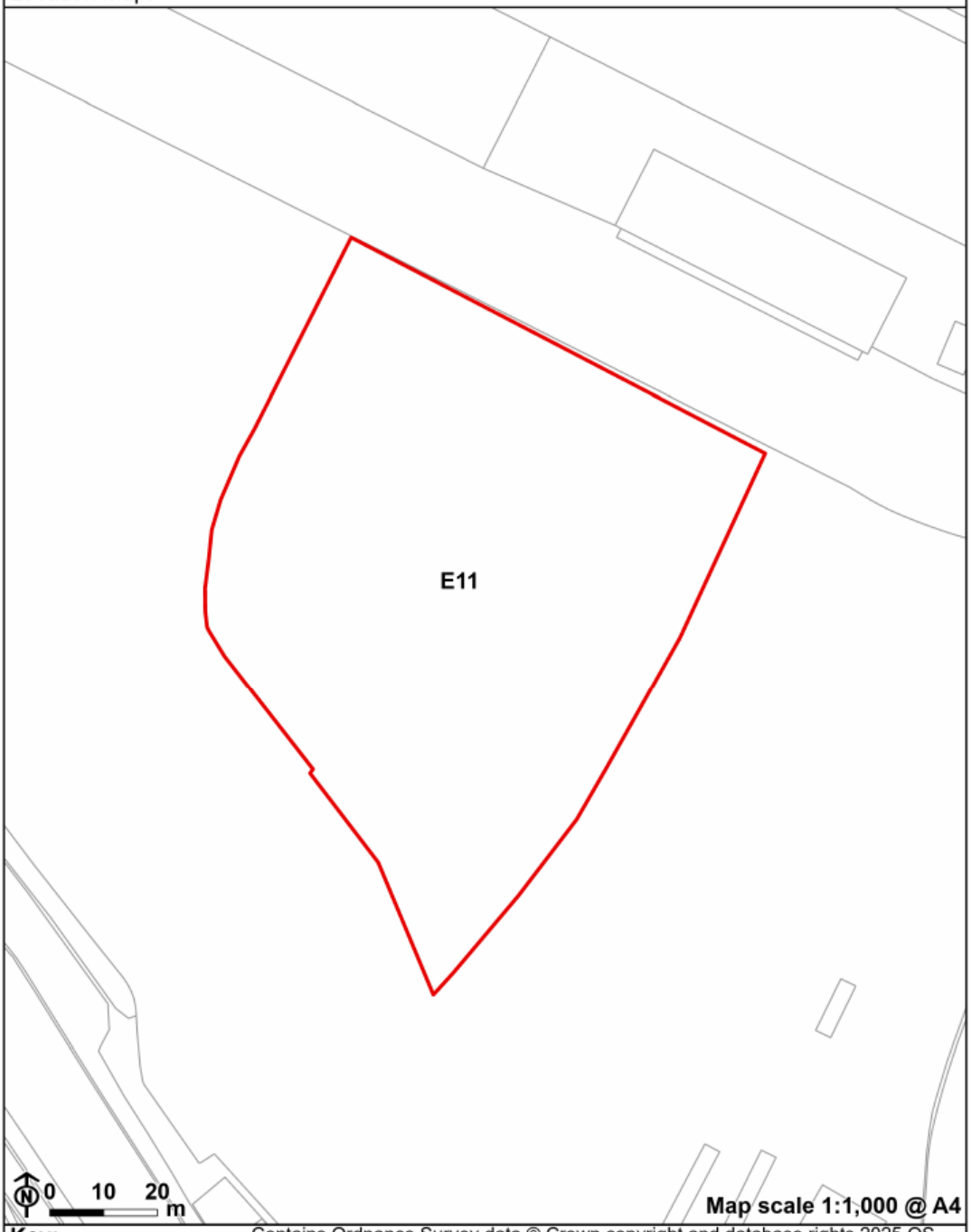


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Site Name: Site Ref:	Willesden Euro Terminal E11
Borough:	Ealing
Location map:	

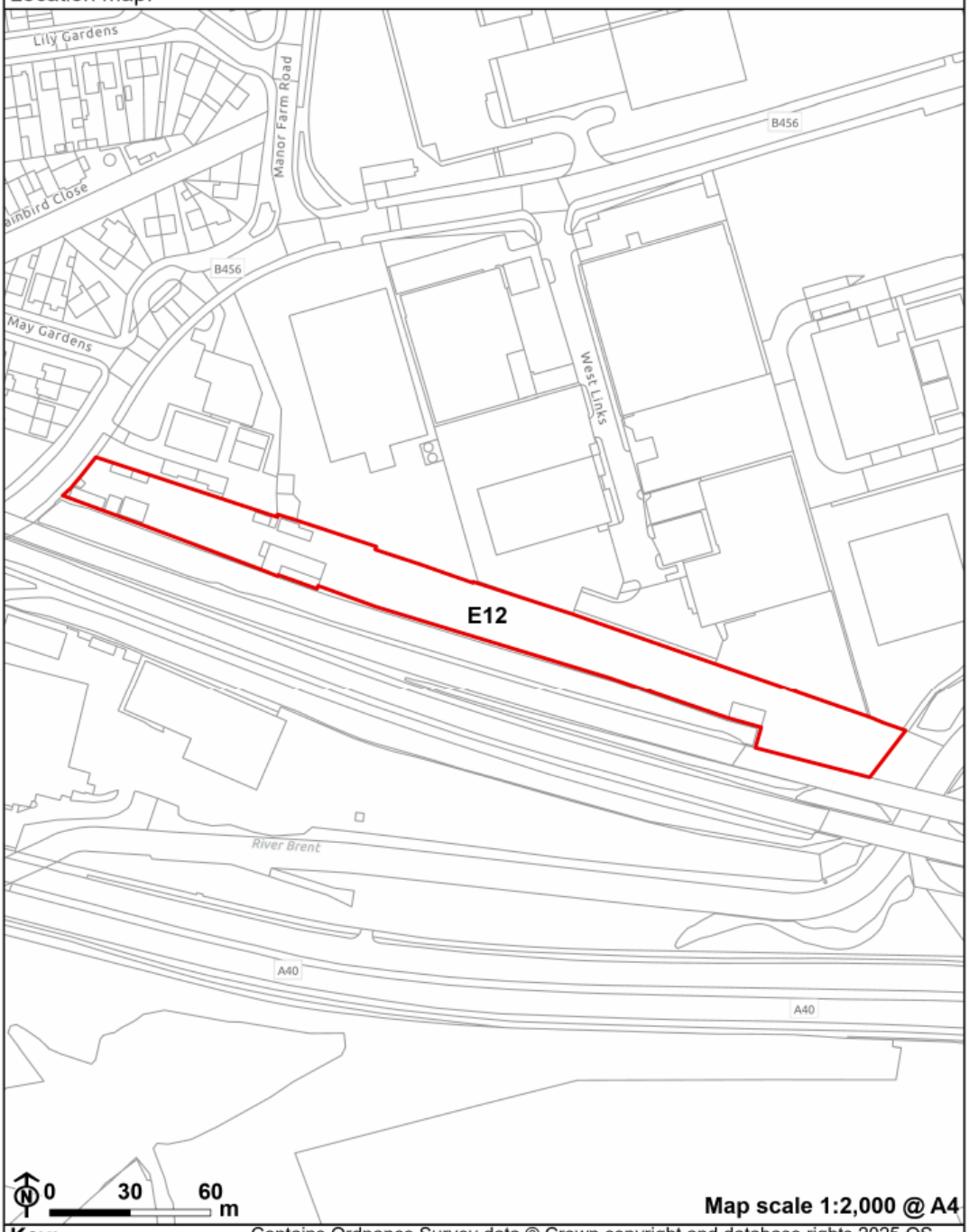


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Site Name: Site Ref:	London Auto Parts Ltd, Alperton Lane E12
Borough:	Ealing
Location map:	

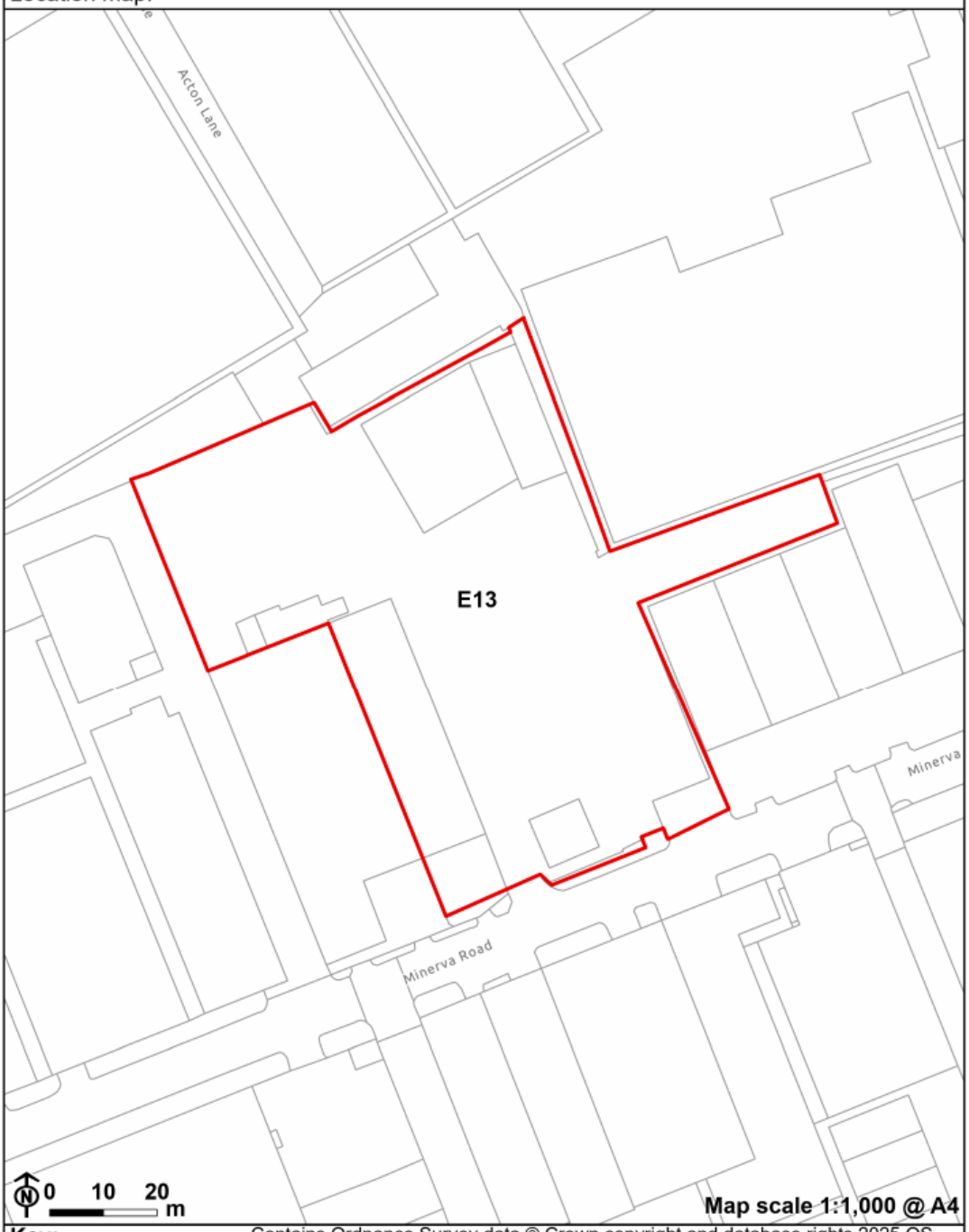


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Site Name: Site Ref:	First Mile Recycling Facility E13
Borough:	Ealing
Location map:	

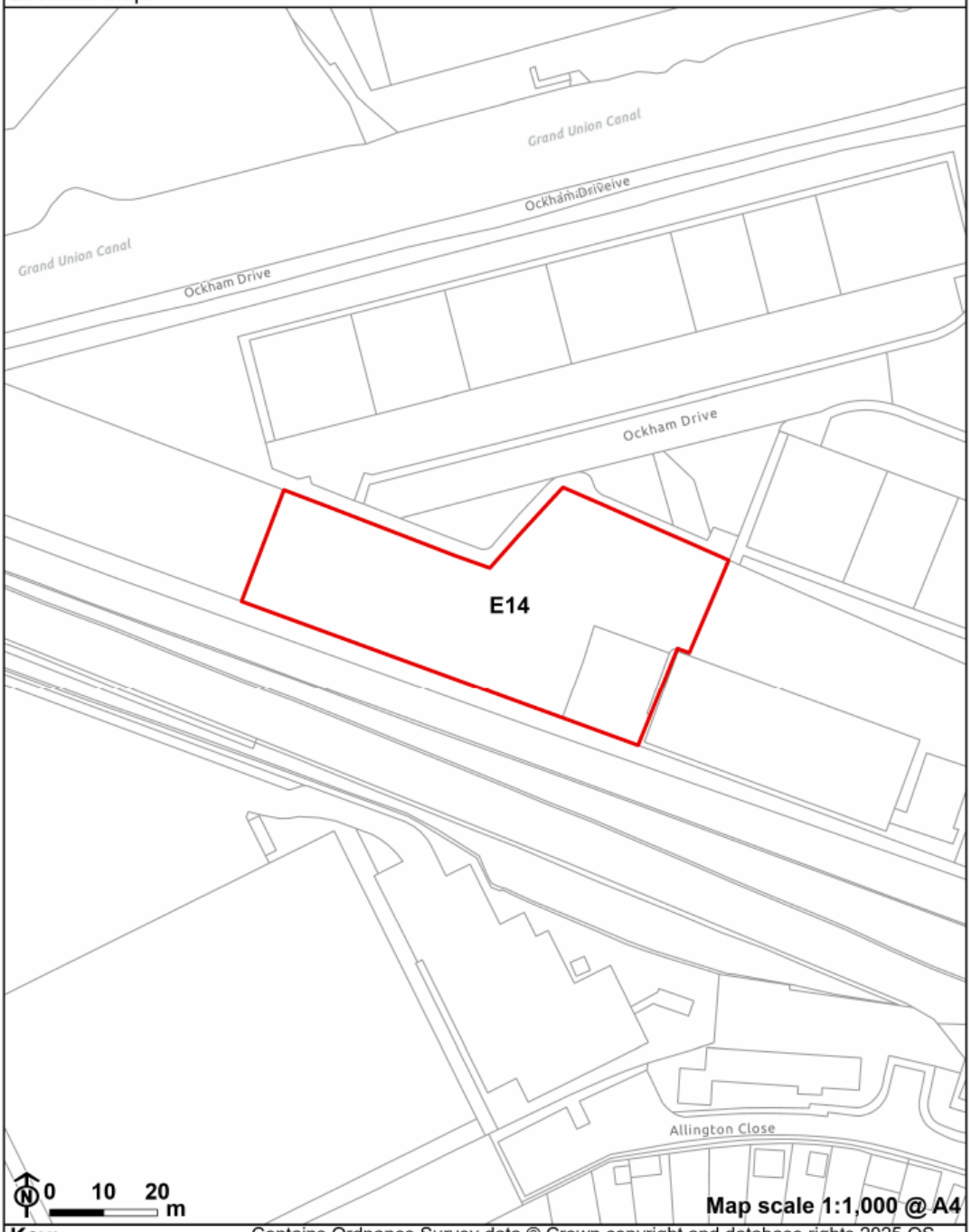


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Site Name: Site Ref:	Station Approach, Oldfield Lane North, Greenford (Haulage World WTS) E14
Borough:	Ealing
Location map:	

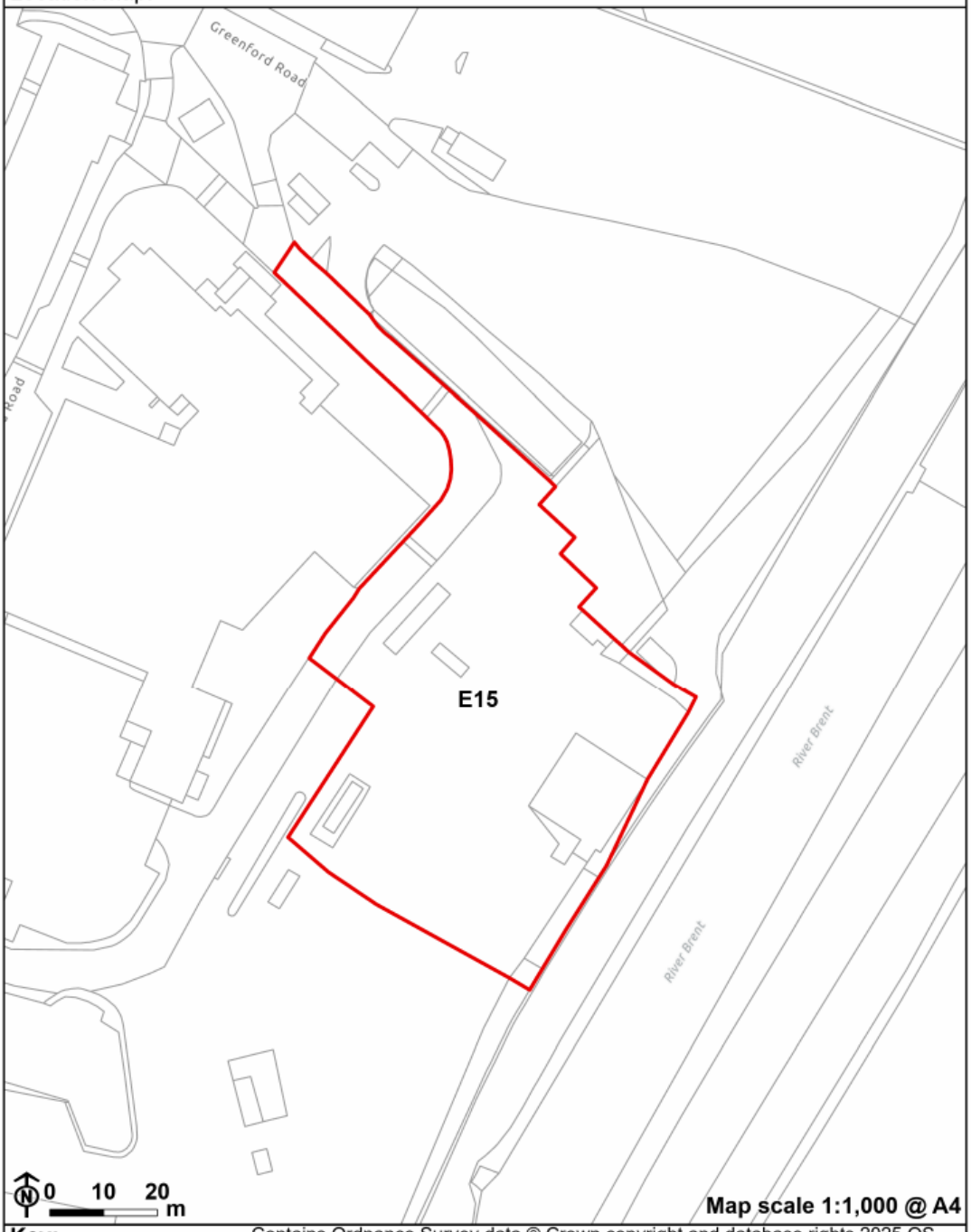


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Site Name: Site Ref:	Greenford Reuse and Recycling Centre and Depot E15
Borough:	Ealing
Location map:	

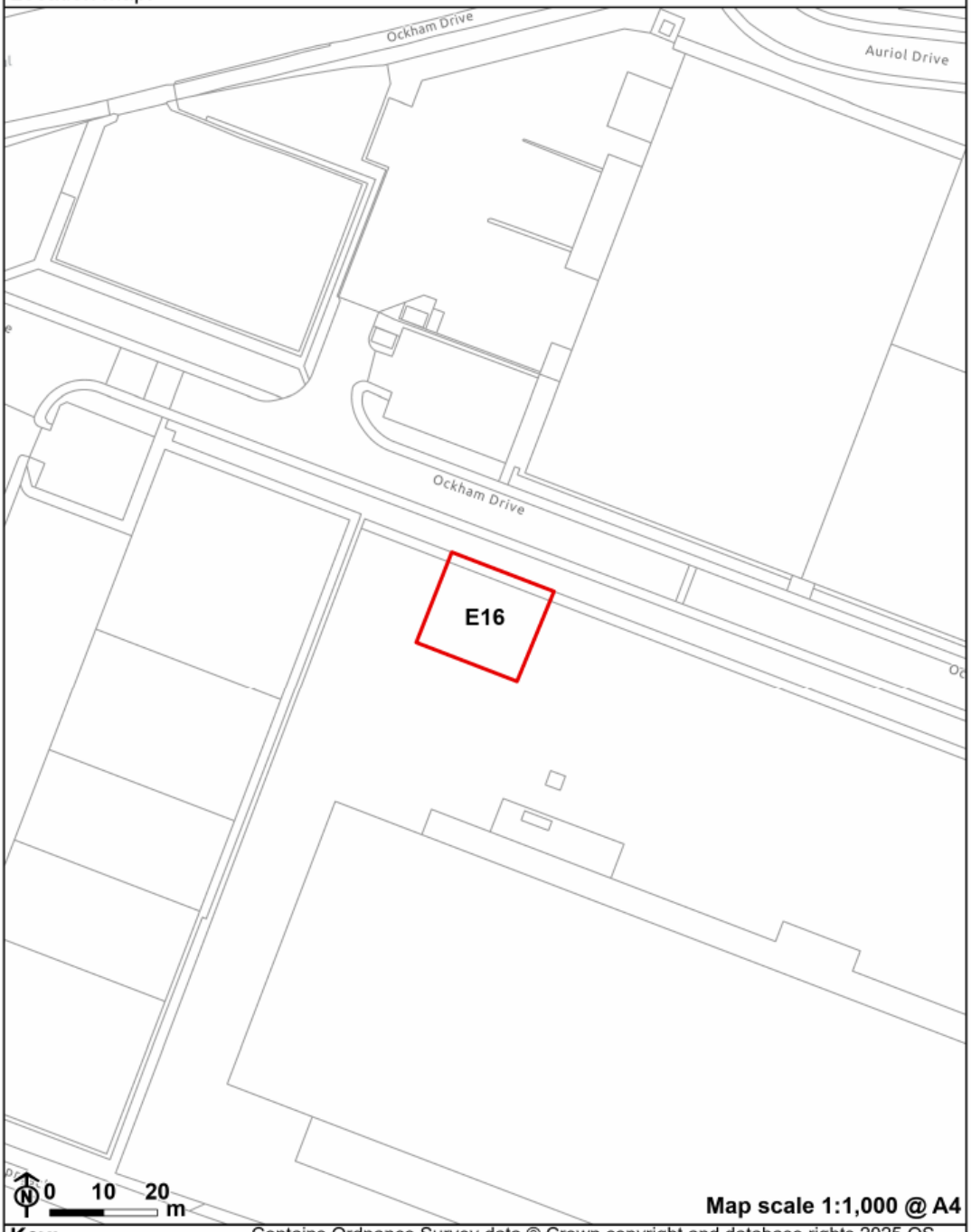


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Site boundary

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Site Name: Site Ref:	Old Field Lane North, Greenford Ocean Estate Distribution Centre E16
Borough:	Ealing
Location map:	

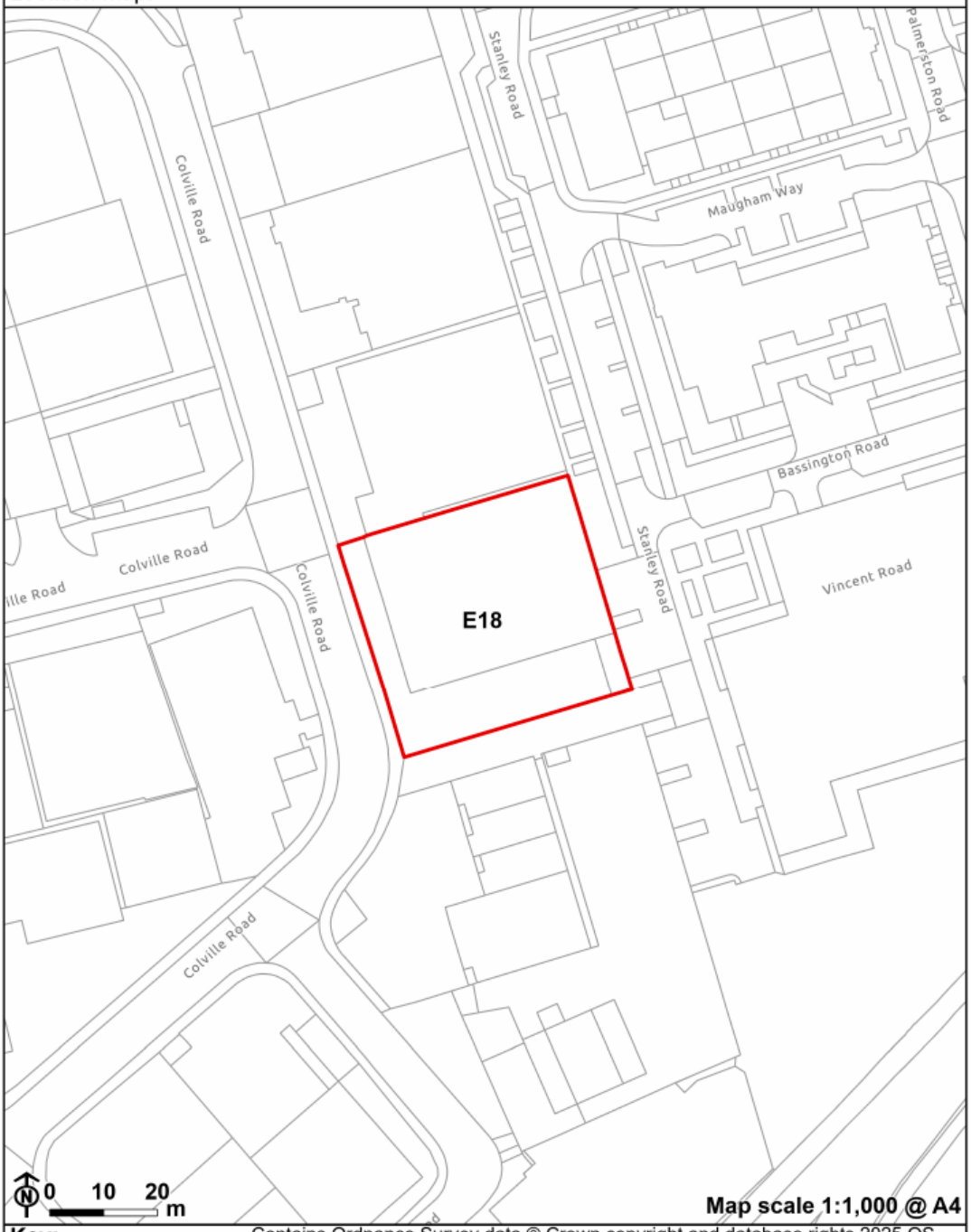


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Site boundary

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Site Name: Site Ref:	Colville Rd E18
Borough:	Ealing
Location map:	



Key:

Site boundary

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Site Name: Site Ref:	Unit 42a Sheraton Business Park, E19
Borough:	Ealing
Location map:	

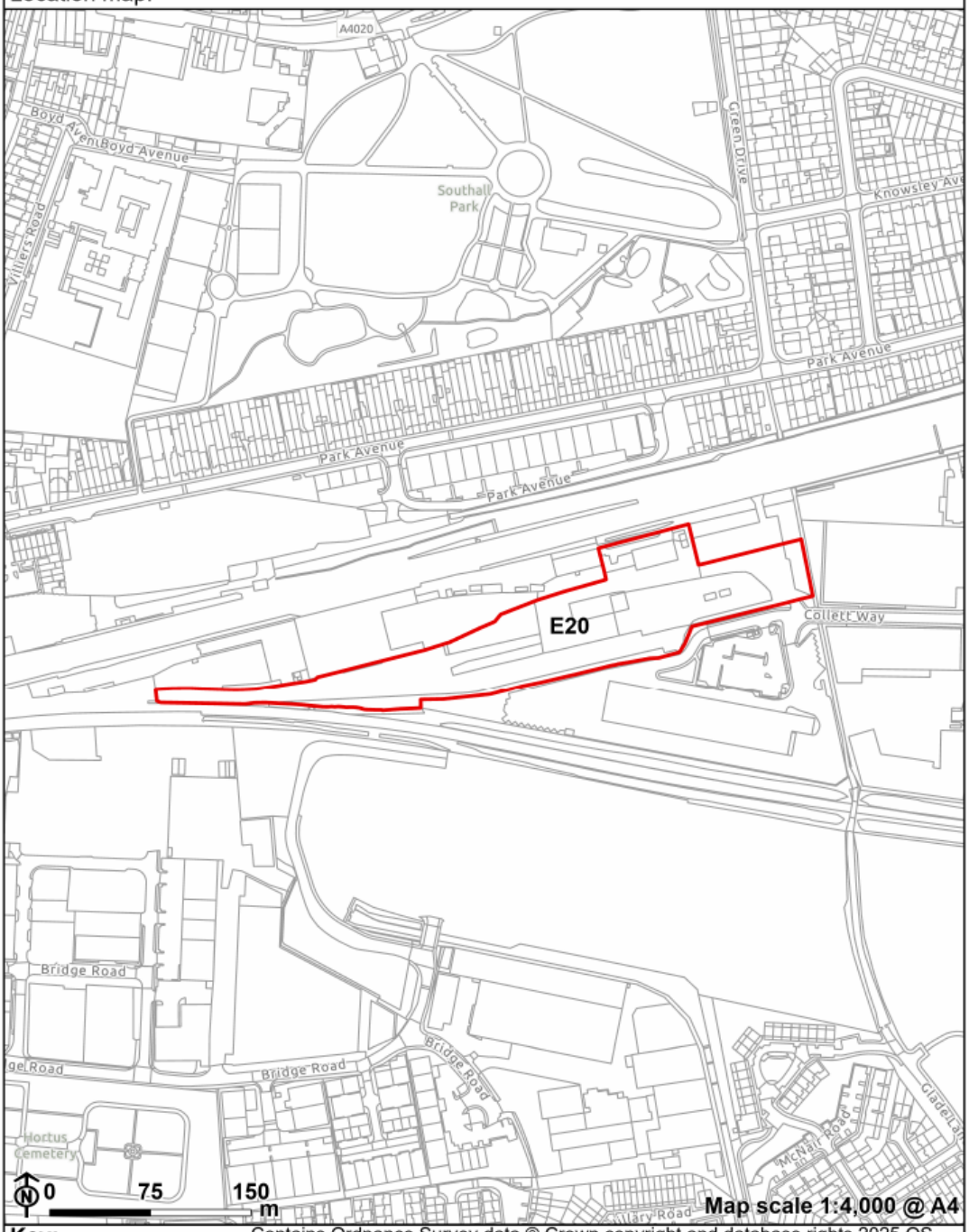


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Site Name: Site Ref:	Collet Way E20
Borough:	Ealing
Location map:	

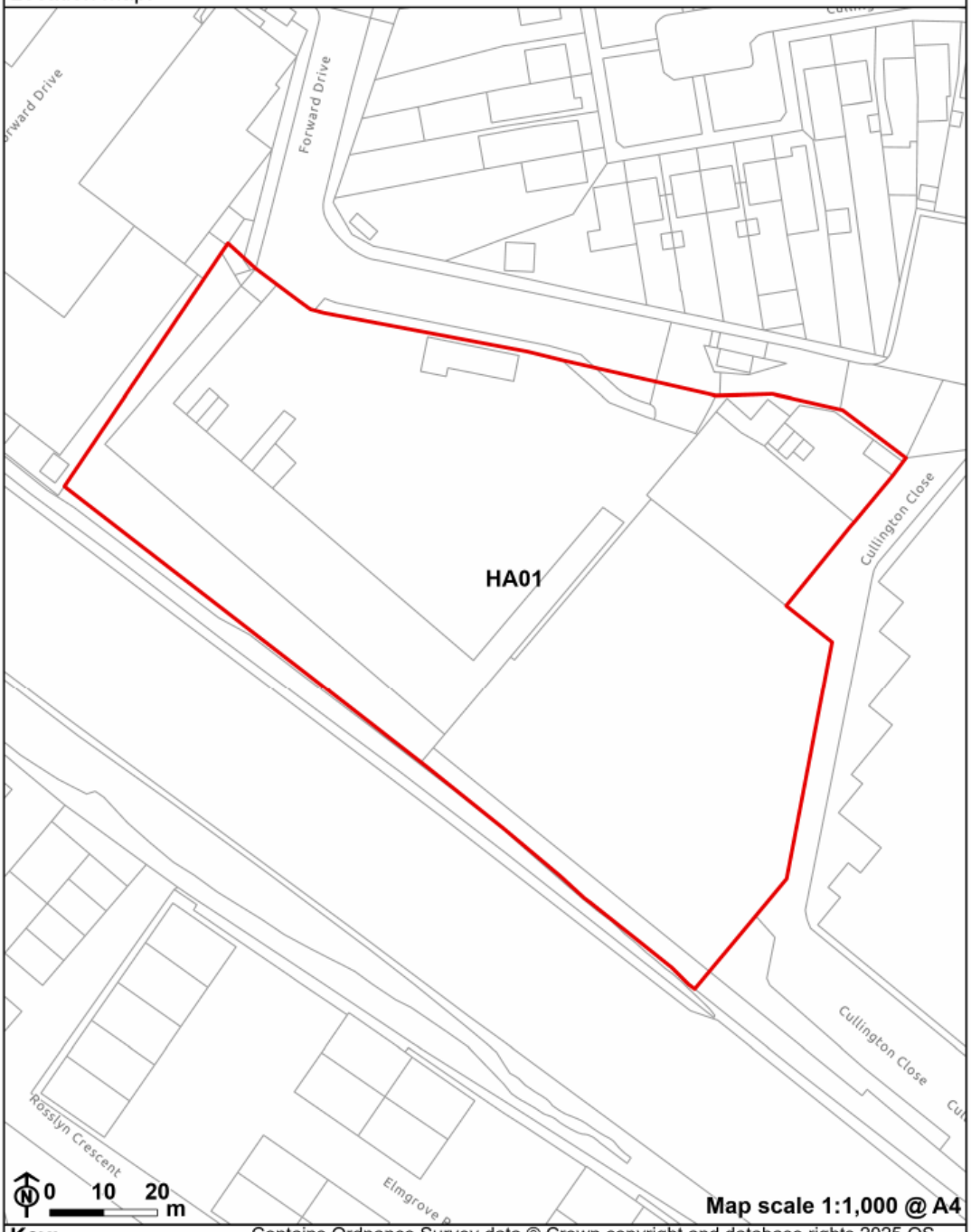


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Site Name: Site Ref:	Forward Drive C A Site, Harrow HA01
Borough:	Harrow
Location map:	

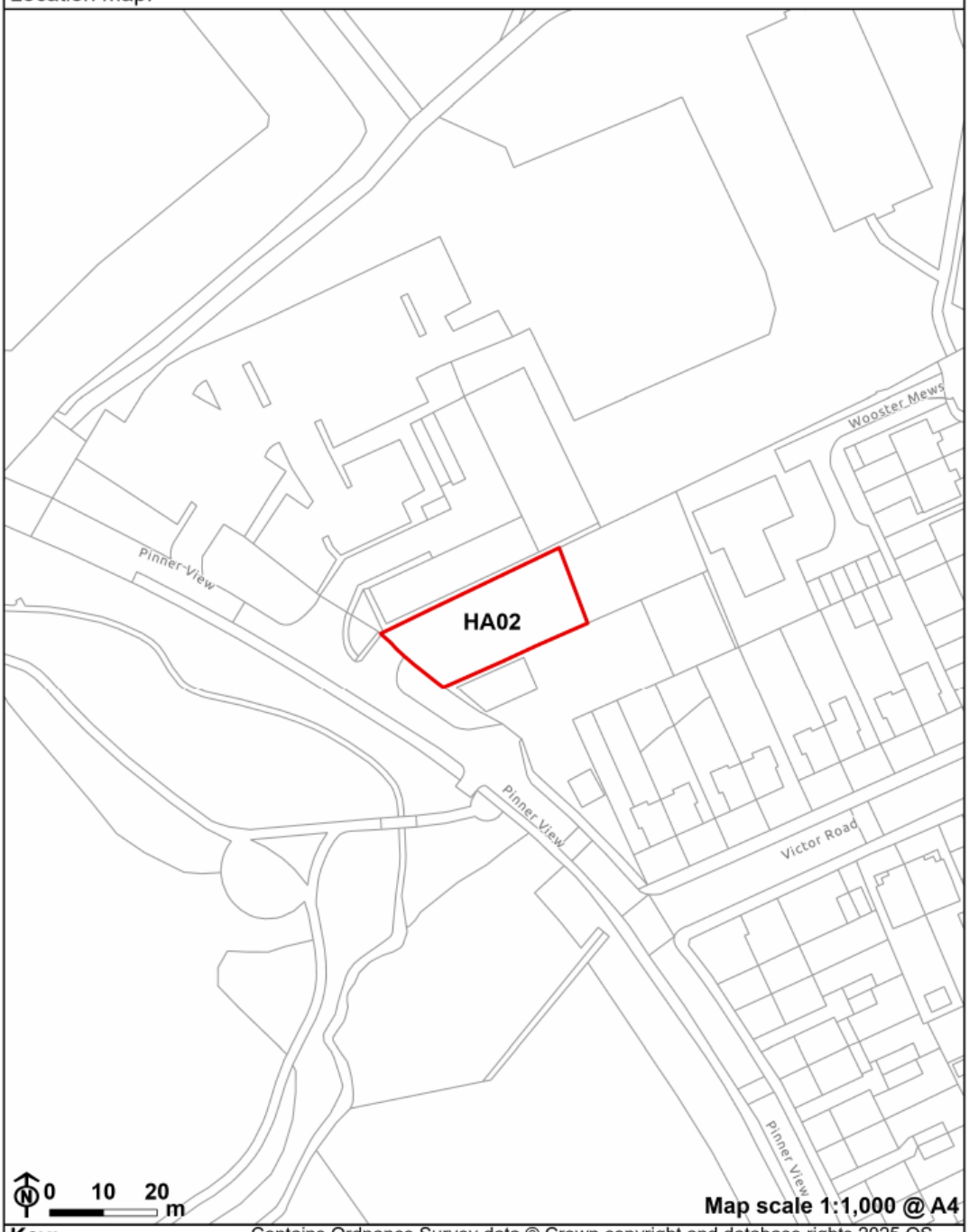


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Site boundary

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Site Name: Site Ref:	151 Pinner View HA02
Borough:	Harrow
Location map:	

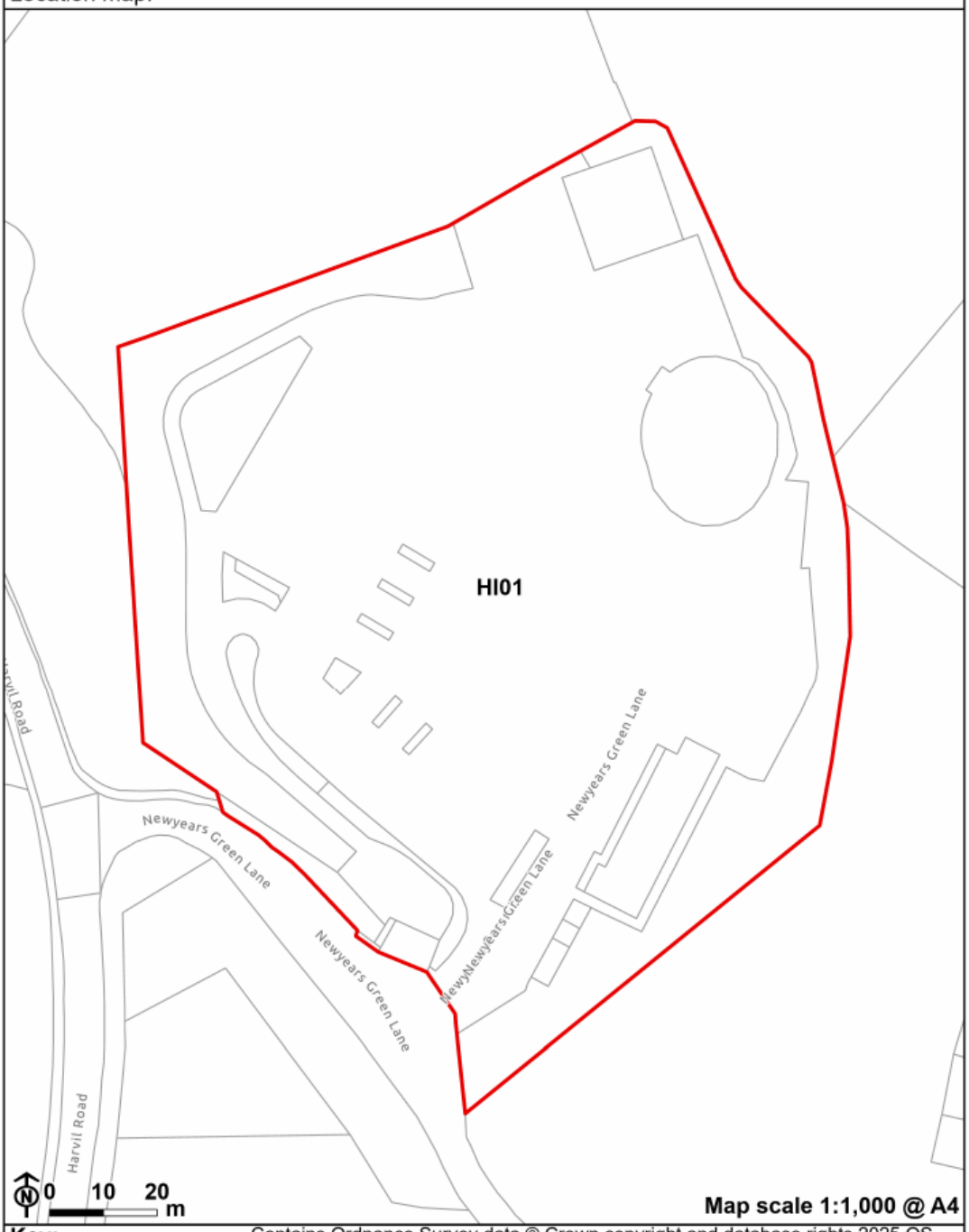


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Site boundary

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Site Name: Site Ref:	New Years Green Lane Civic Amenity Site HI01
Borough:	Hillingdon
Location map:	

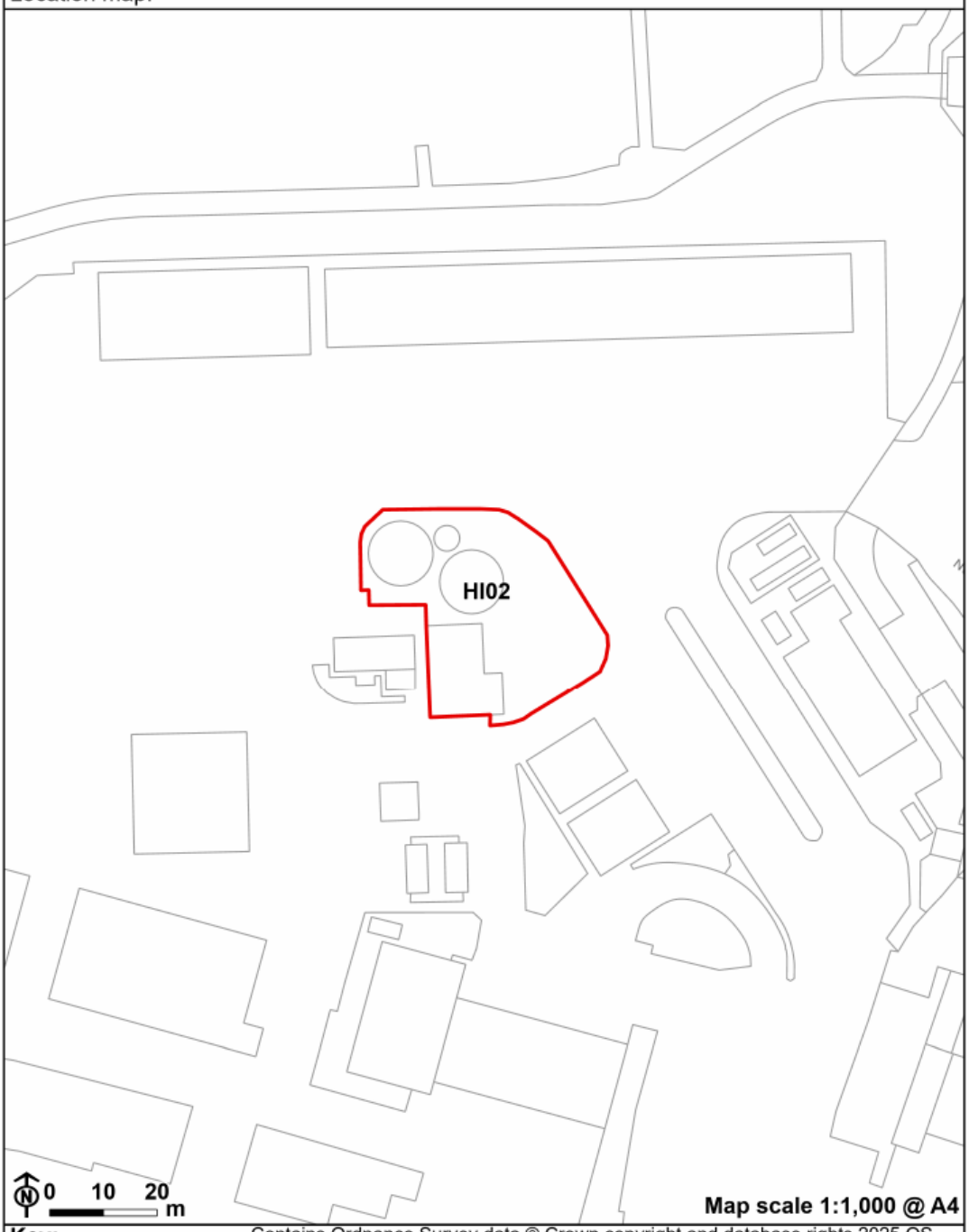


Key:

Site boundary

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Site Name: Site Ref:	Airside Waste Sweepings Treatment Facility HI02
Borough:	Hillingdon
Location map:	

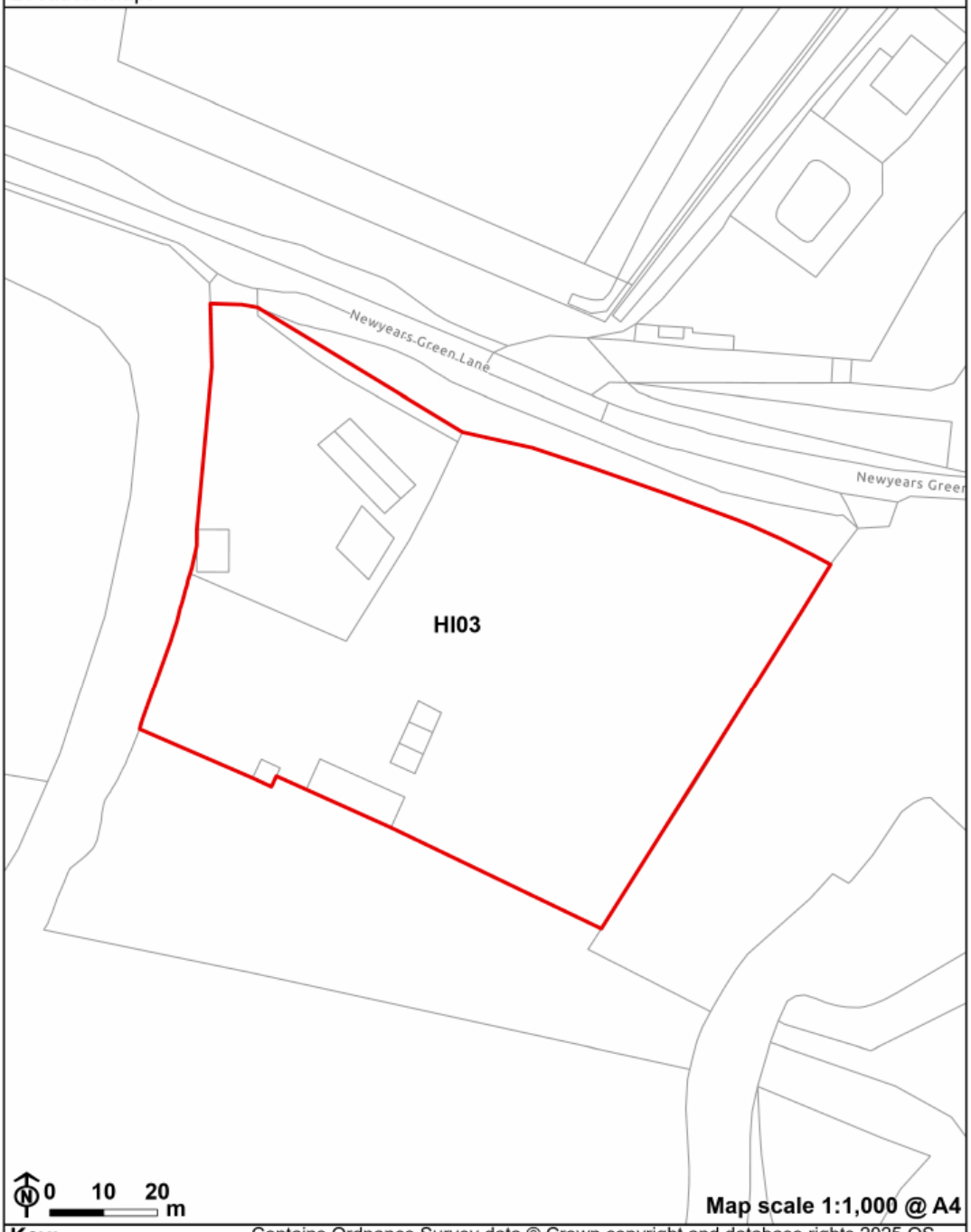


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Site Name: Site Ref:	New Years Green Lane HI03
Borough:	Hillingdon
Location map:	

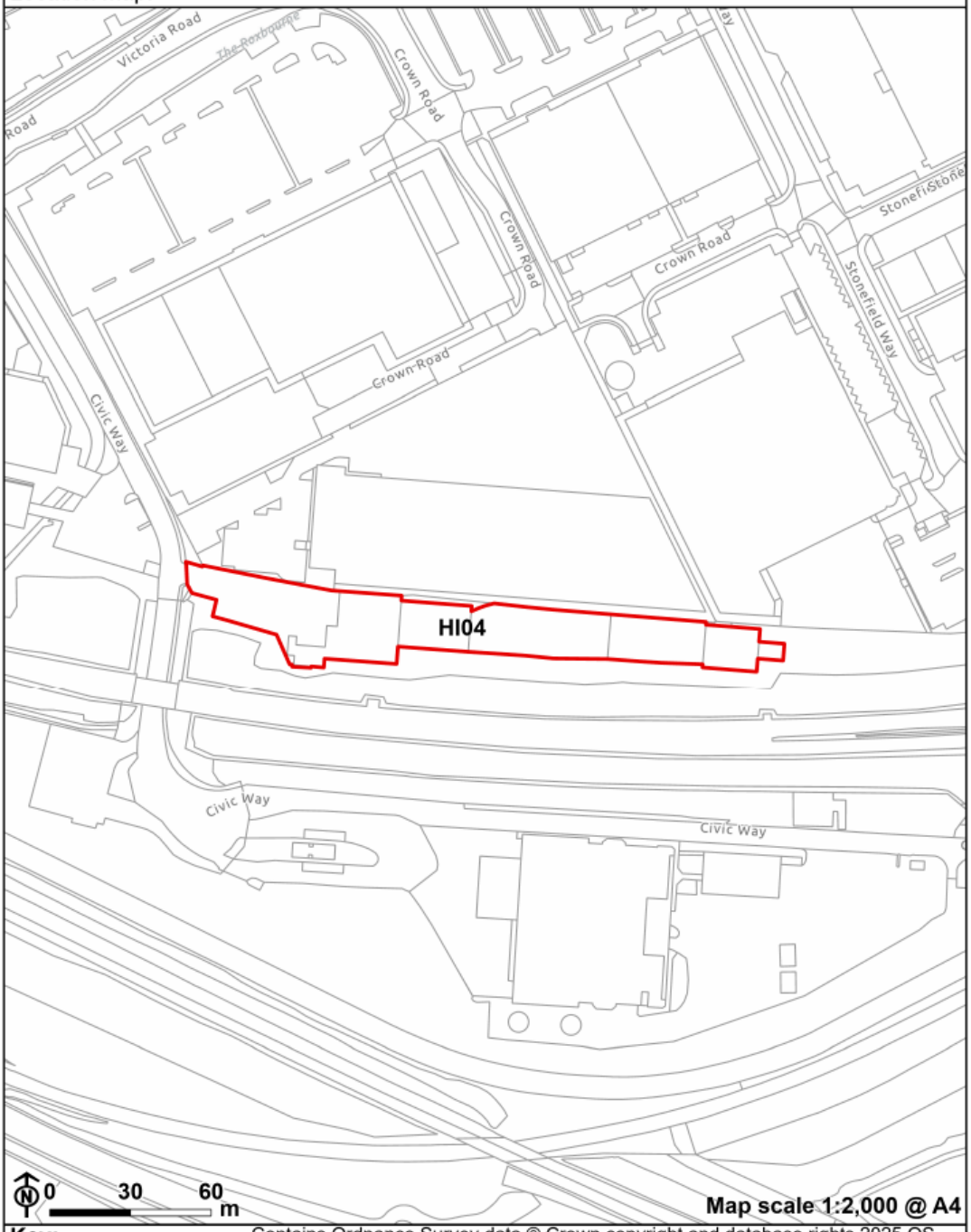


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Site Name: Site Ref:	B&K WTS,Civic Way, Victoria Rd HI04
Borough:	Hillingdon
Location map:	

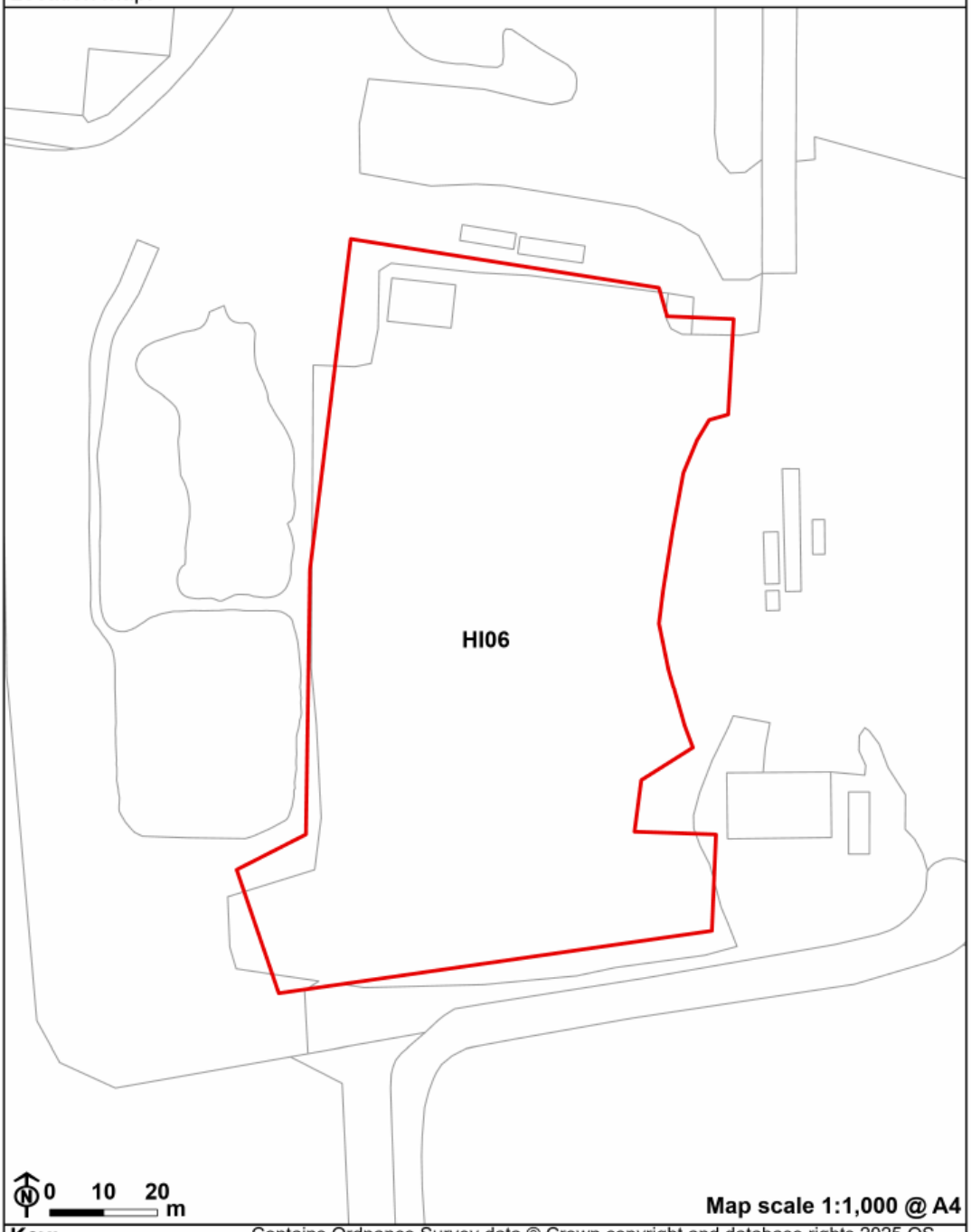


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Site Name: Site Ref:	Land off Holloway Lane Harmondsworth HI06
Borough:	Hillingdon
Location map:	

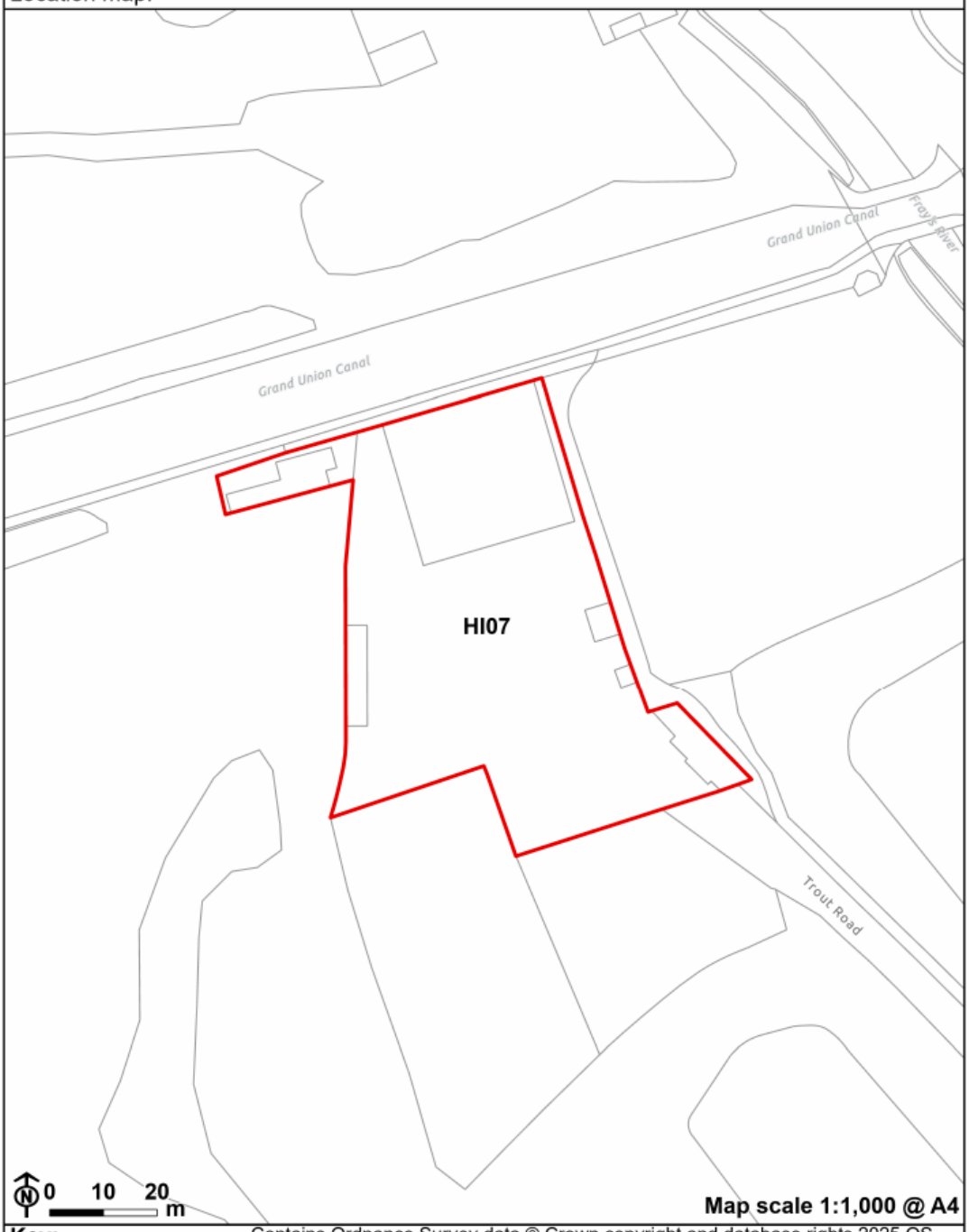


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Site Name: Site Ref:	G K Depot HI07
Borough:	Hillingdon
Location map:	

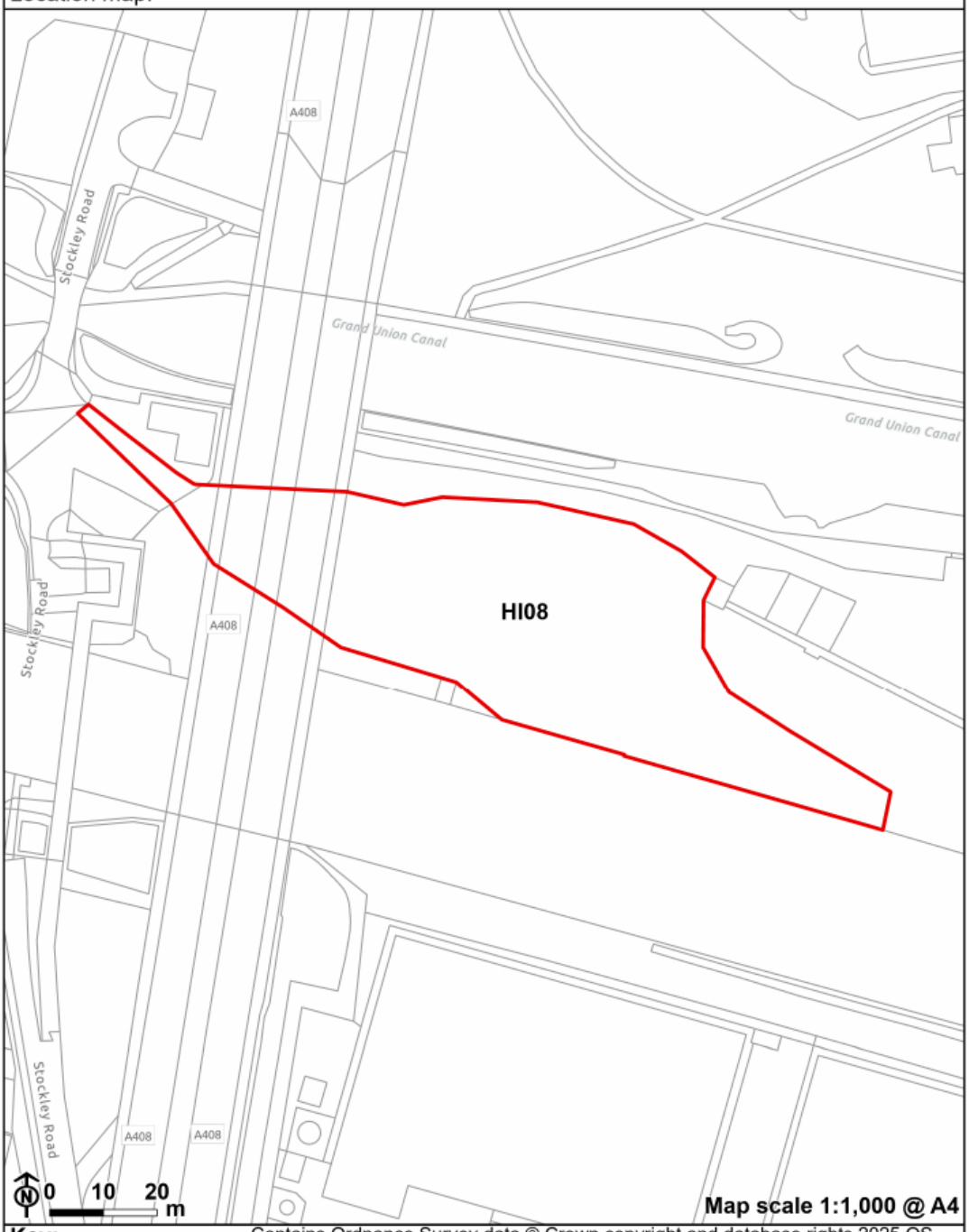


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Site Name: Site Ref:	West Drayton Aggregates HI08
Borough:	Hillingdon
Location map:	

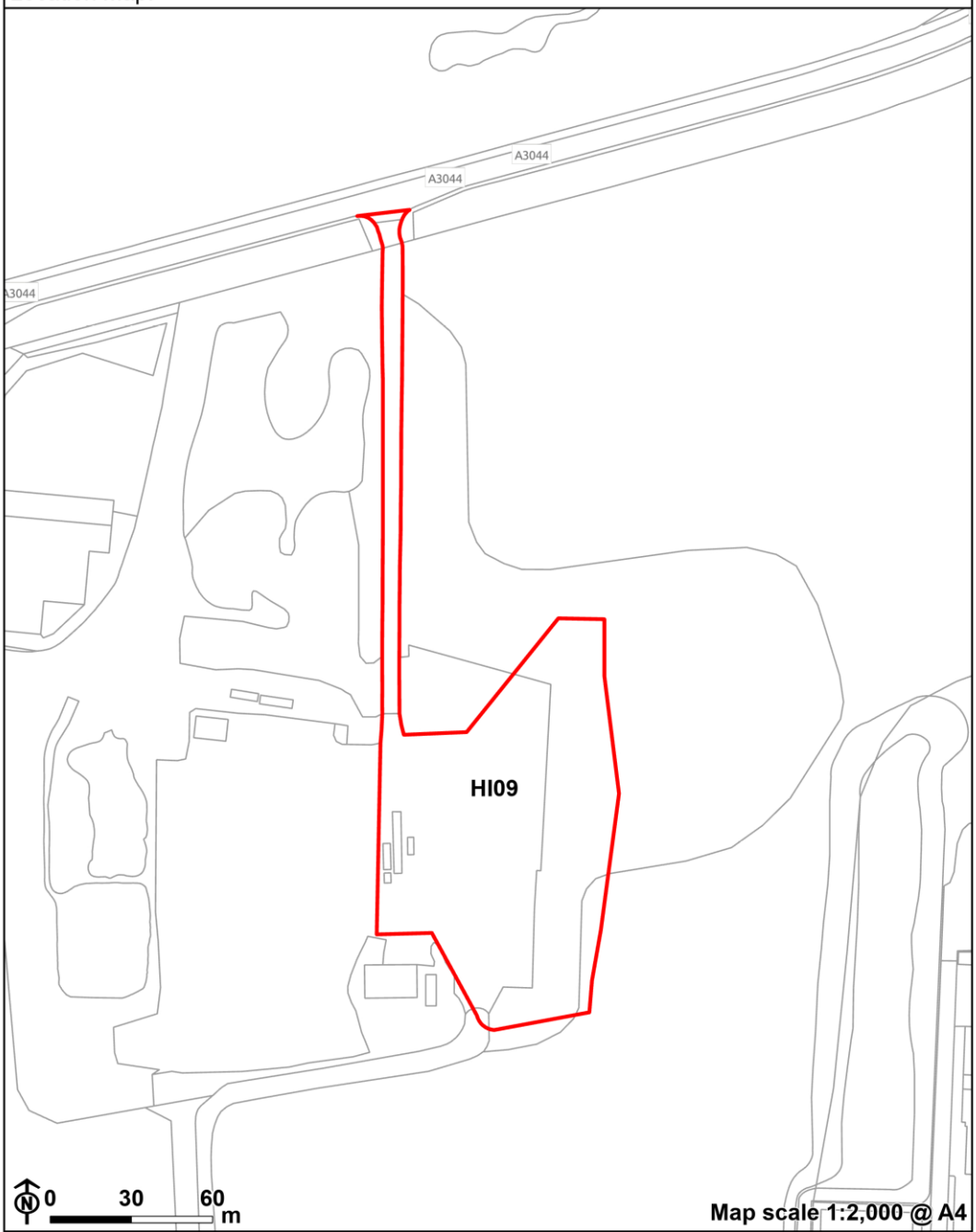


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Site Name: Site Ref:	Holloway Lane Materials Recycling Facility HI09
Borough:	Hillingdon
Location map:	

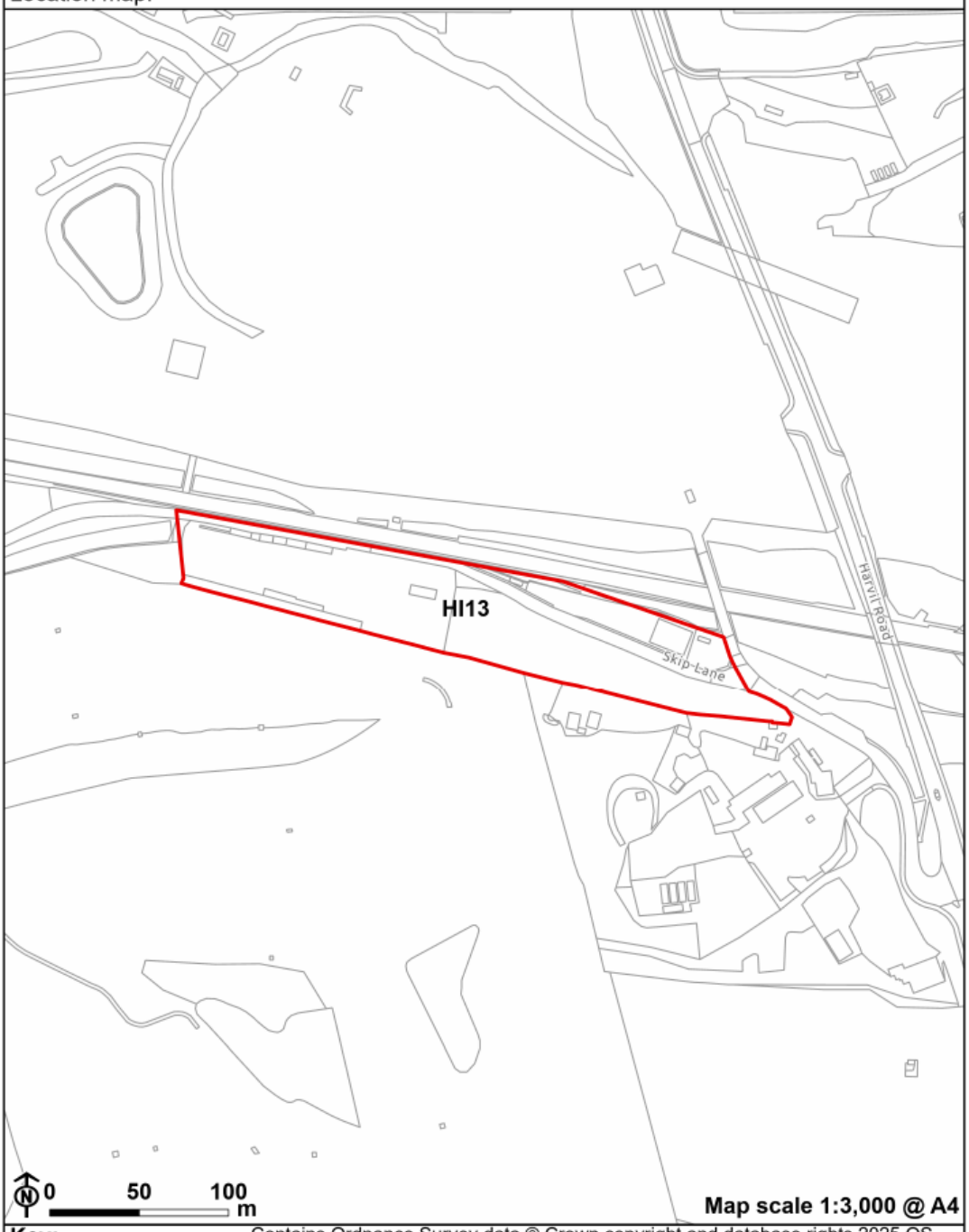


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Site Name: Site Ref:	Skip Lane, Harville Road (Sortera) HI13
Borough:	Hillingdon
Location map:	

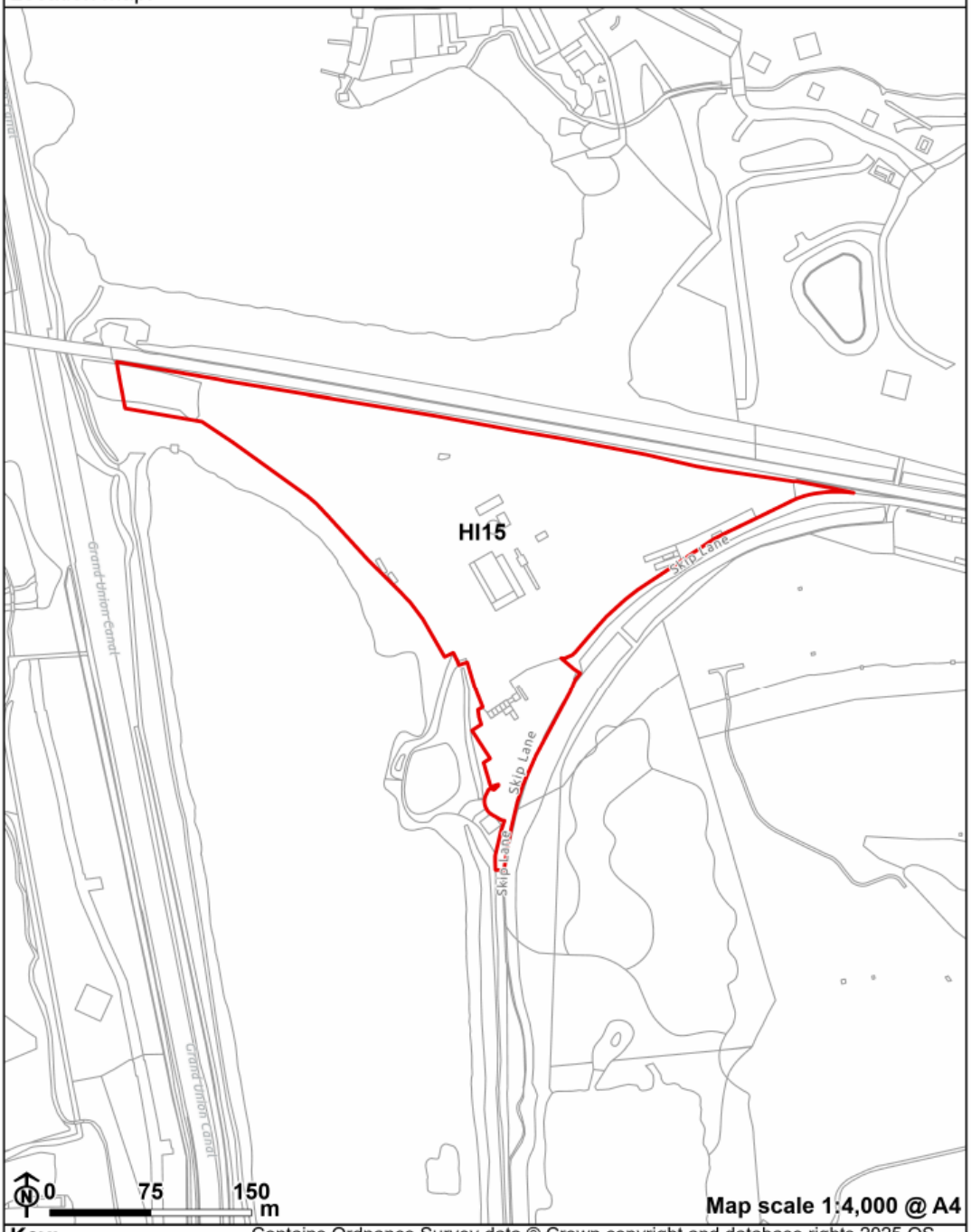


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Site Name: Site Ref:	Thames Materials Skip Lane HI15
Borough:	Hillingdon
Location map:	

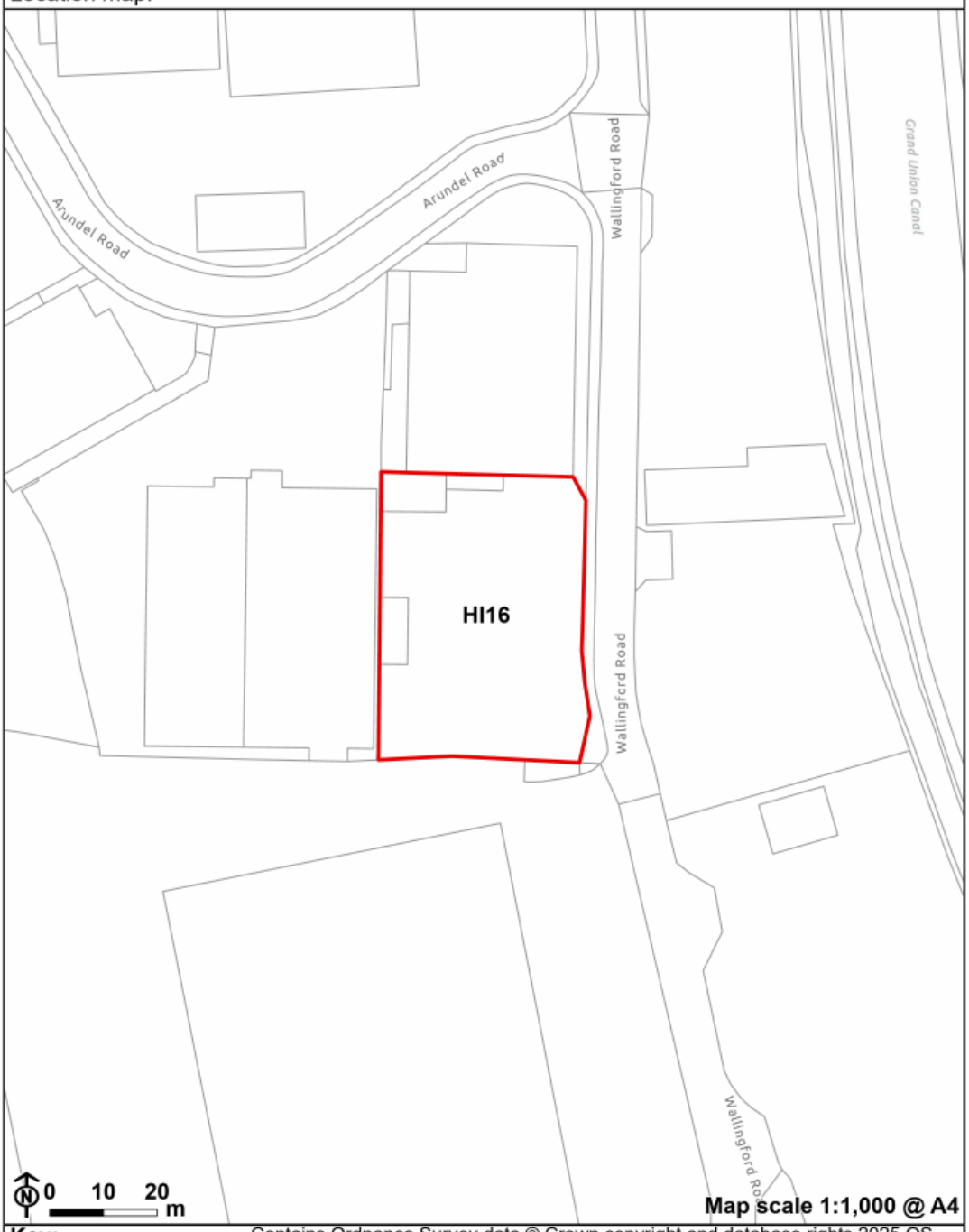


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Site Name: Site Ref:	Wallingford Road Recycling Facility HI16
Borough:	Hillingdon
Location map:	

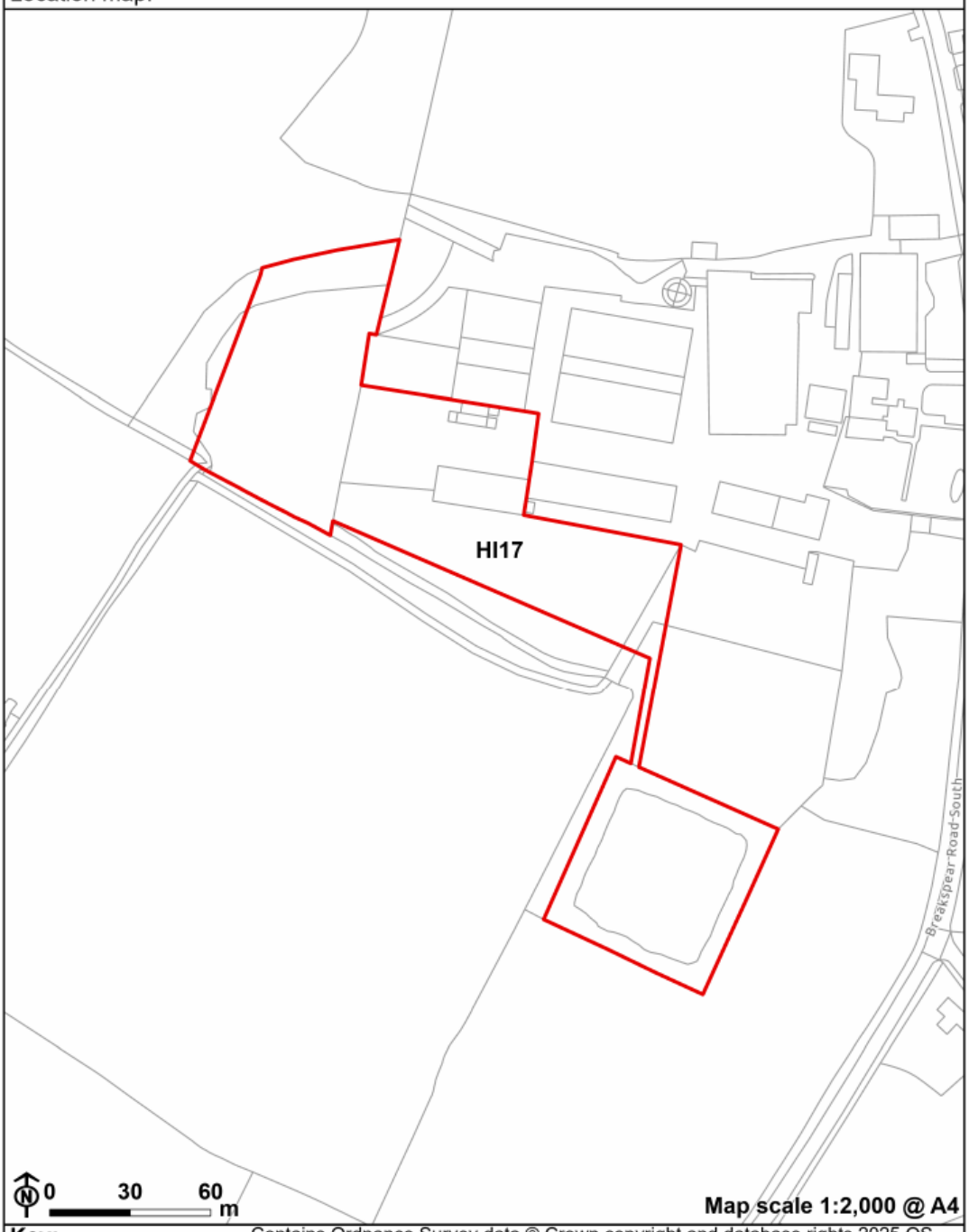


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Site Name: Site Ref:	Crows Nest Farm HI17
Borough:	Hillingdon
Location map:	

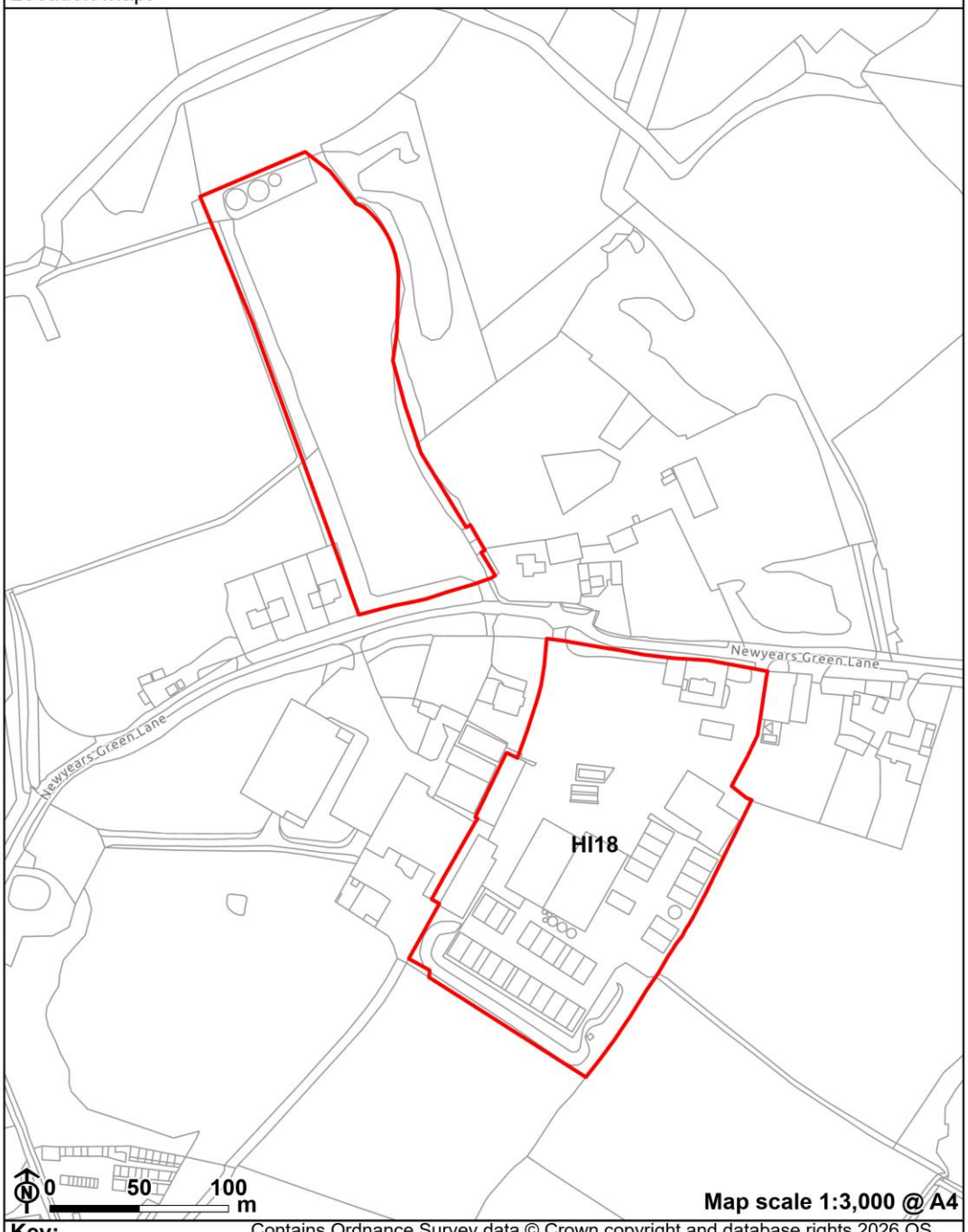


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Site Name: Site Ref:	High View Farm HI18
Borough:	Hillingdon
Location map:	

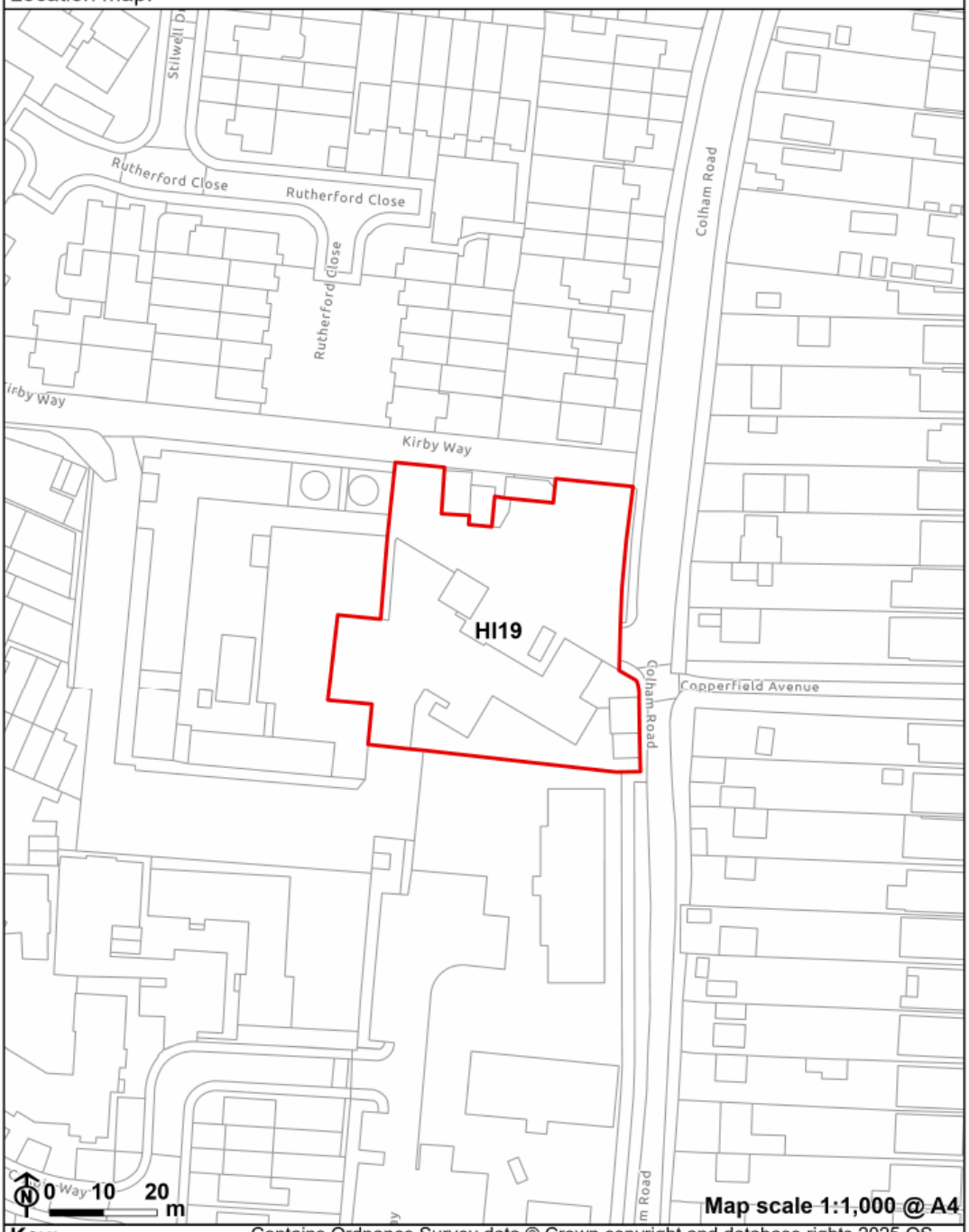


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Site Name: Site Ref:	Hillingdon Clinical Waste Incinerator HI19
Borough:	Hillingdon
Location map:	

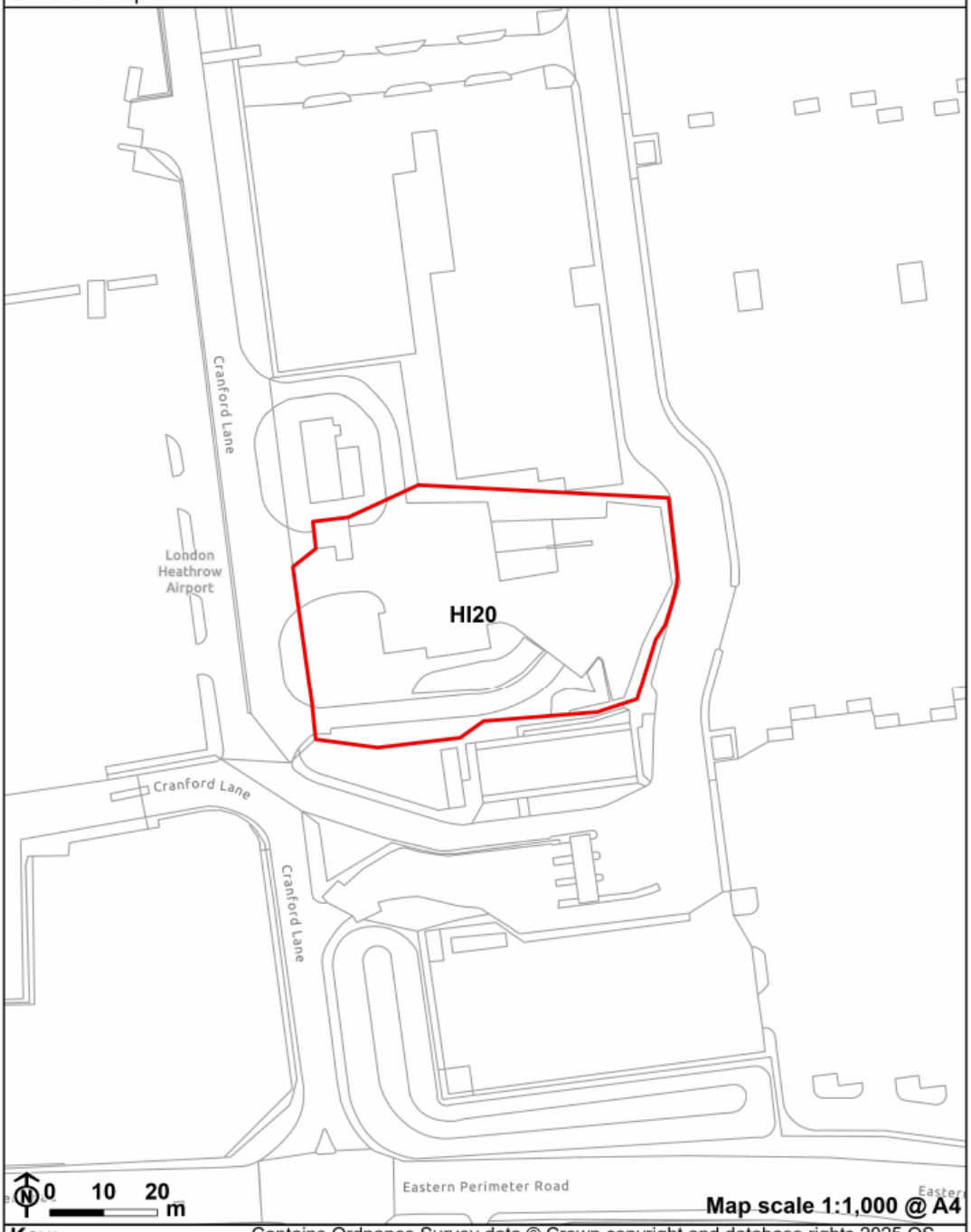


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Site Name: Site Ref:	Cranford Lane WTS, Heathrow HI20
Borough:	Hillingdon
Location map:	

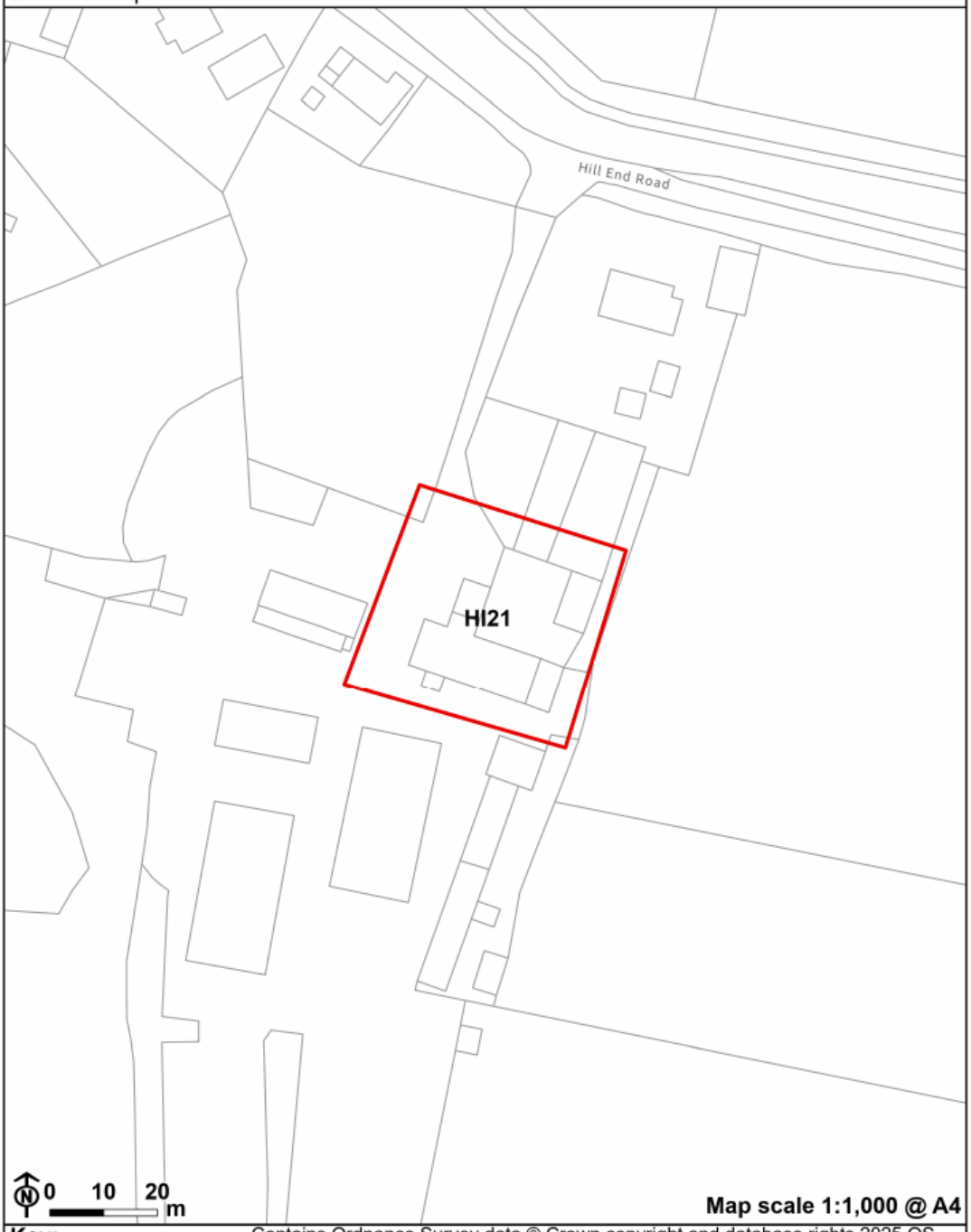


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Site Name: Site Ref:	Waybeards Farm, Hill End Road, Harefield HI21
Borough:	Hillingdon
Location map:	

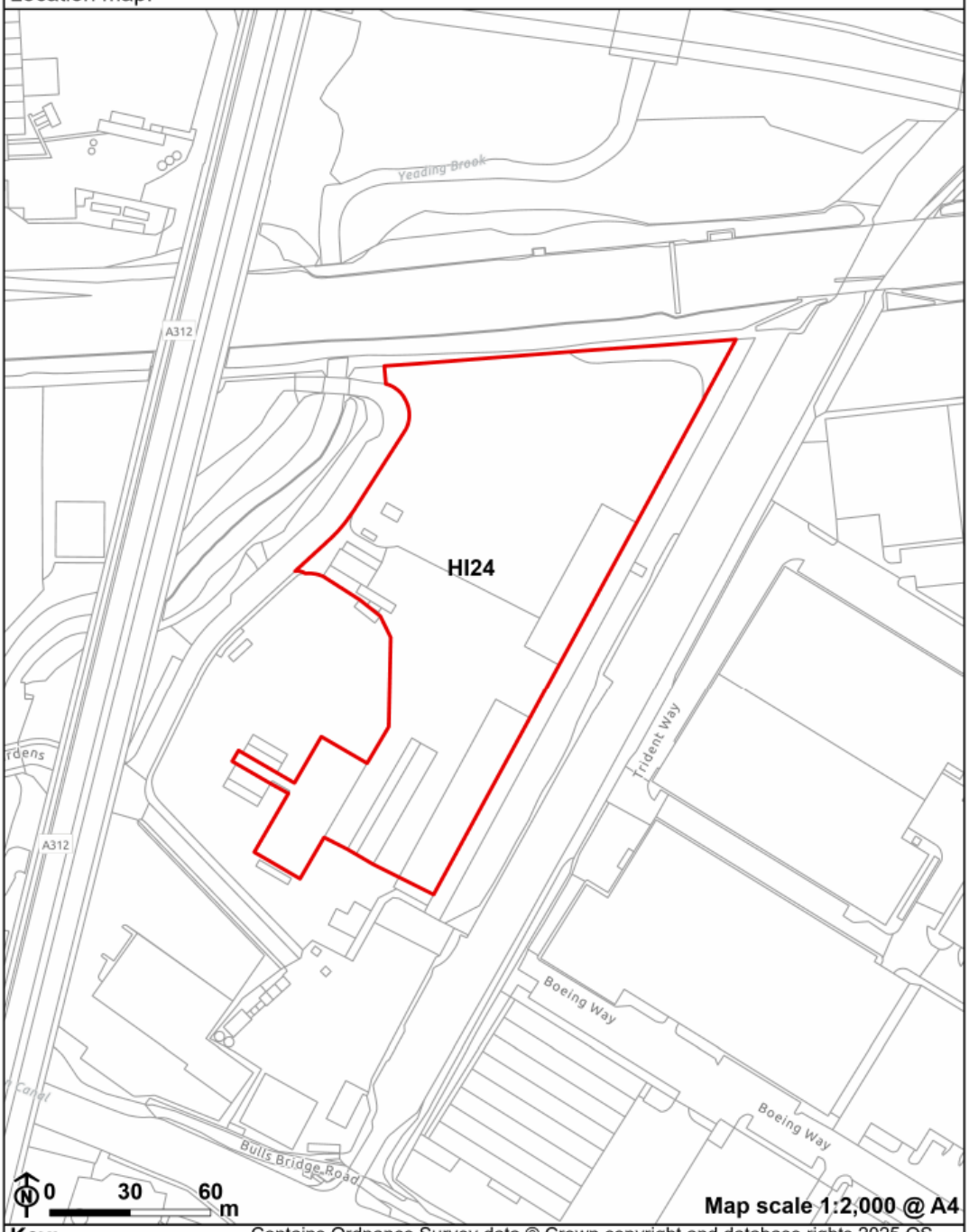


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Site Name: Site Ref:	Heathrow Depot HI24
Borough:	Hillingdon
Location map:	

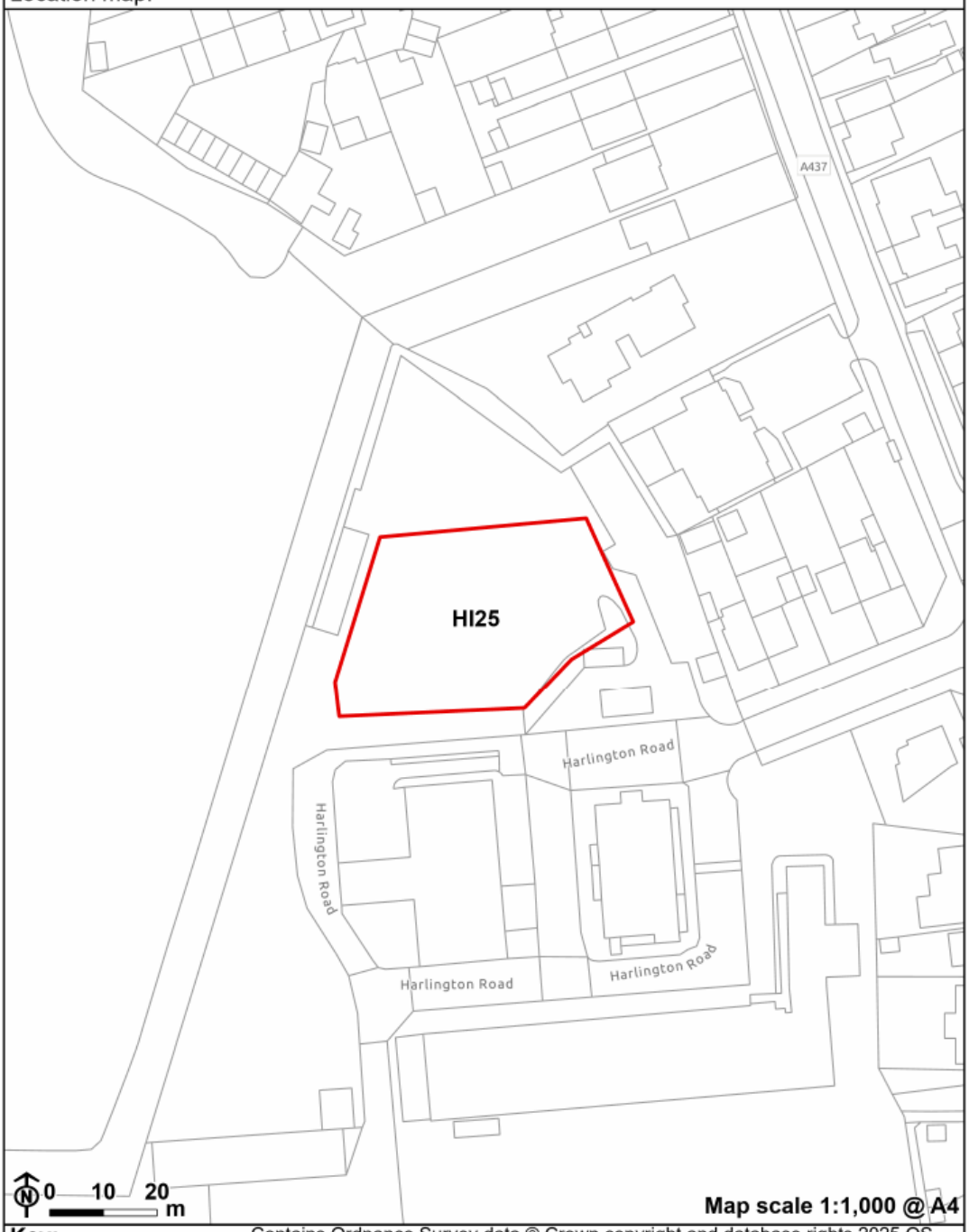


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Site Name: Site Ref:	Central Depot Harlington Road HI25
Borough:	Hillingdon
Location map:	

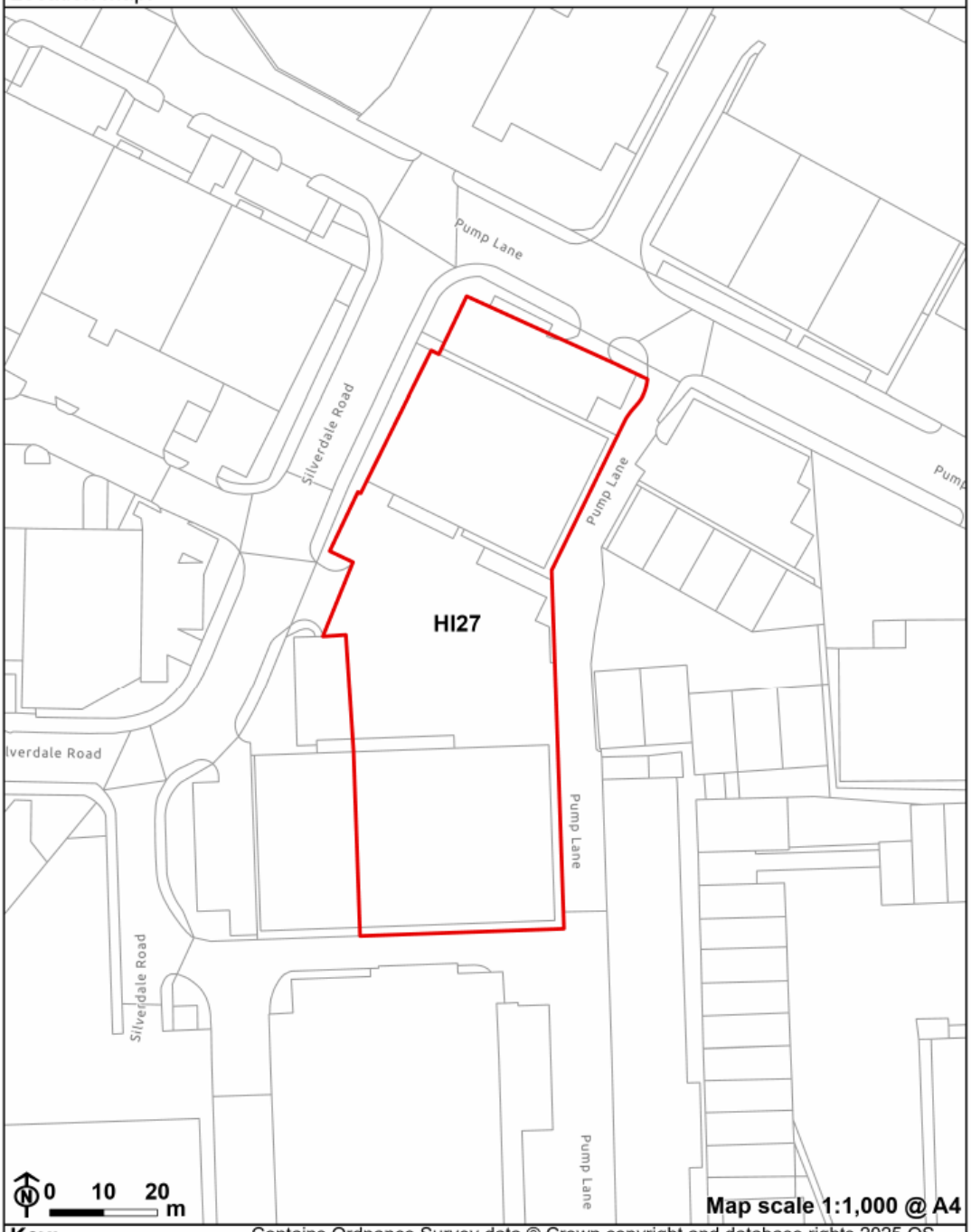


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Site Name: Site Ref:	Unit 1 & 2 Pump Lane Industrial Estate HI27
Borough:	Hillingdon
Location map:	

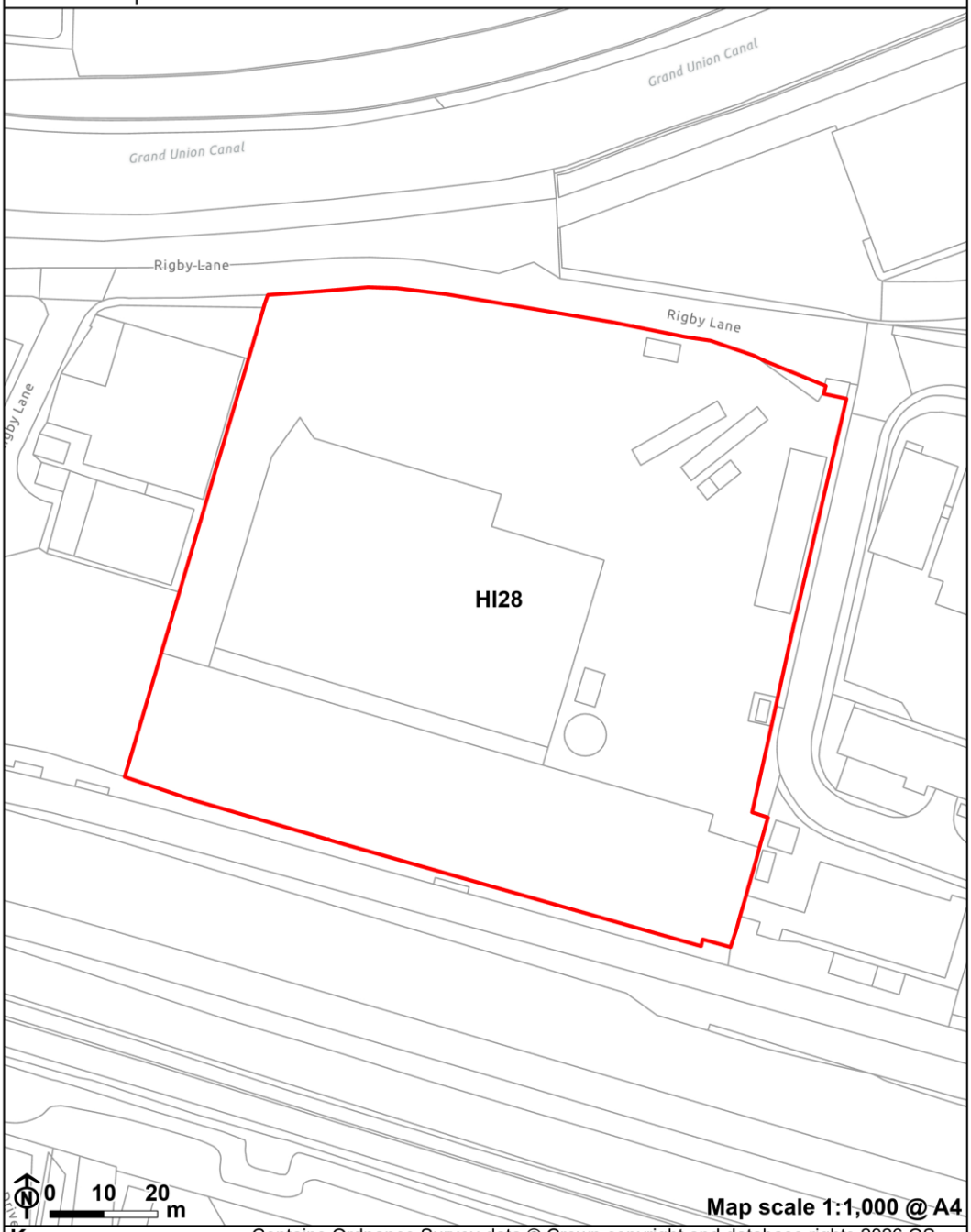


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Site Name: Site Ref:	Hayes Transfer Station, Rigby Road HI28
Borough:	Hillingdon
Location map:	

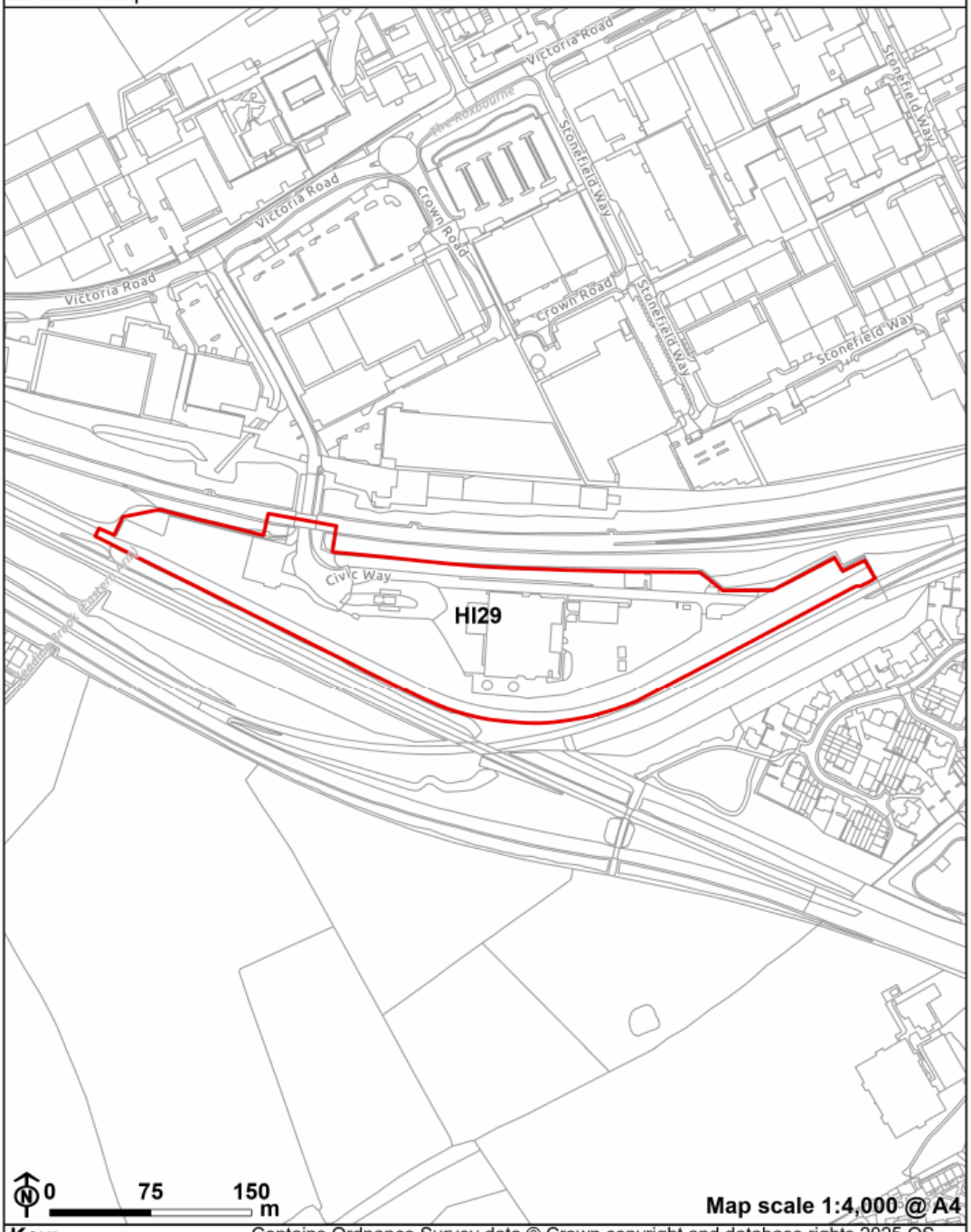


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Site Name: Site Ref:	Victoria Road Waste Transfer Station HI29
Borough:	Hillingdon
Location map:	

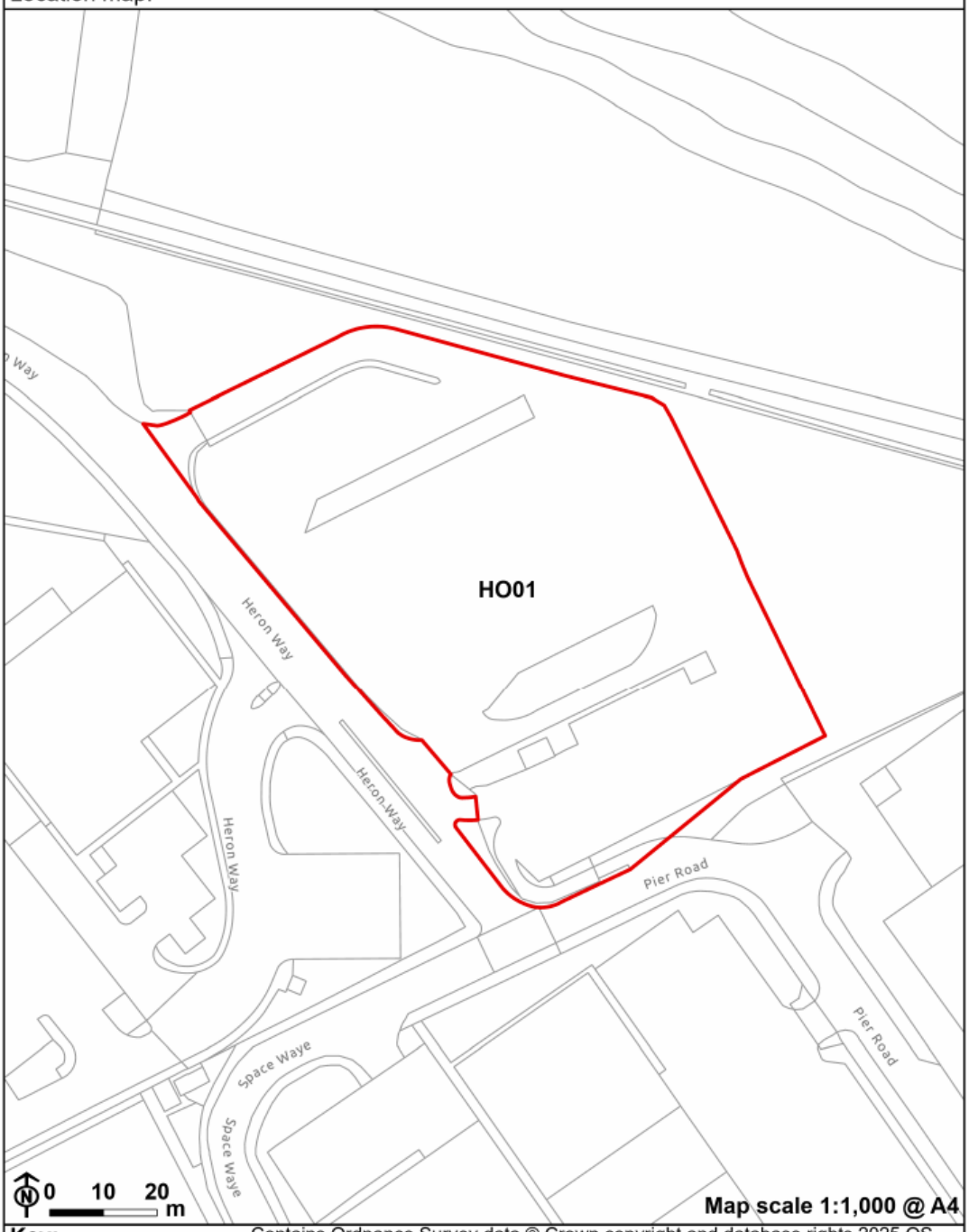


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Site Name: Site Ref:	Space Waye Civic Amenity Site HO01
Borough:	Hounslow
Location map:	

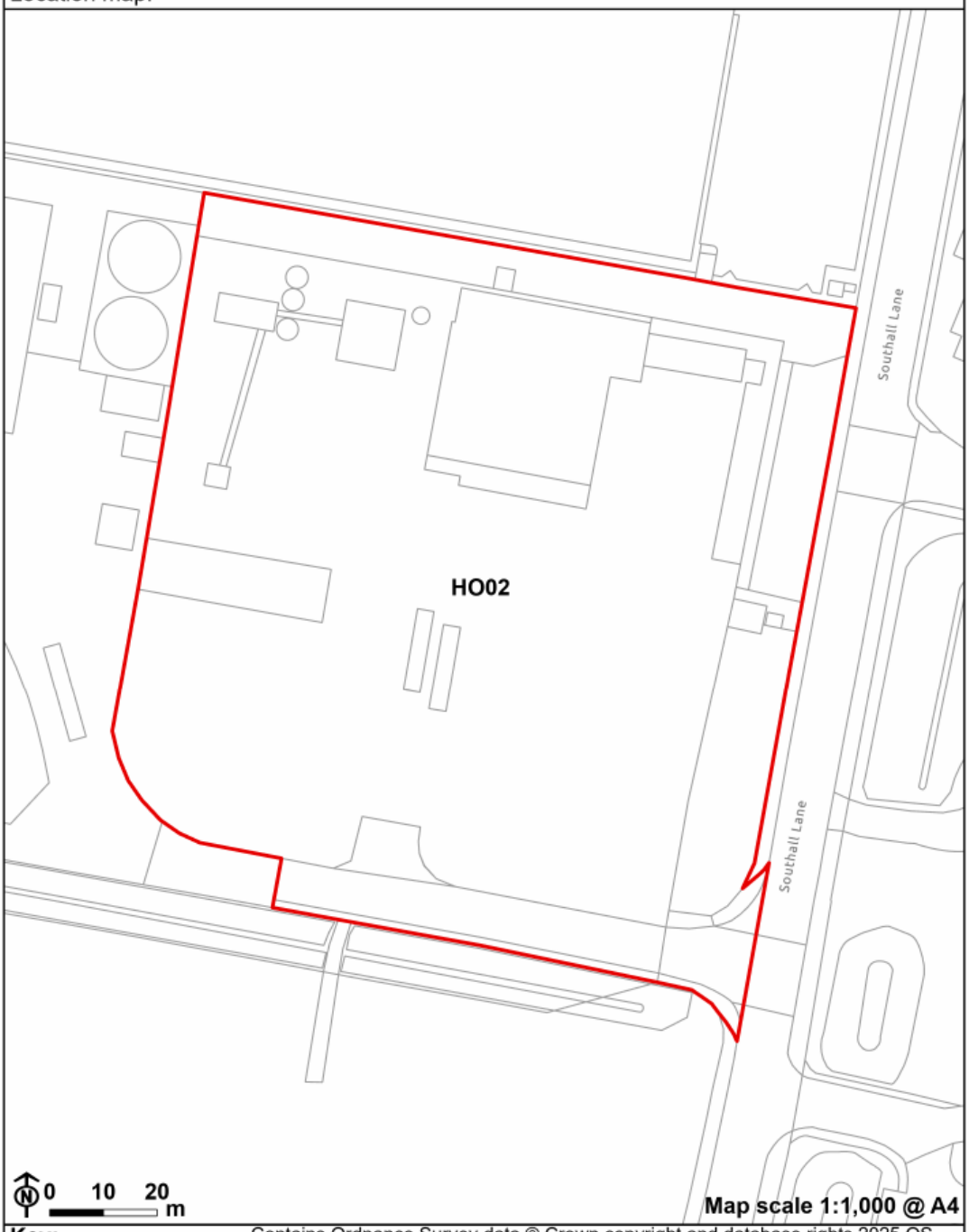


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Site Name: Site Ref:	Quattro Site Southall HO02
Borough:	Hounslow
Location map:	

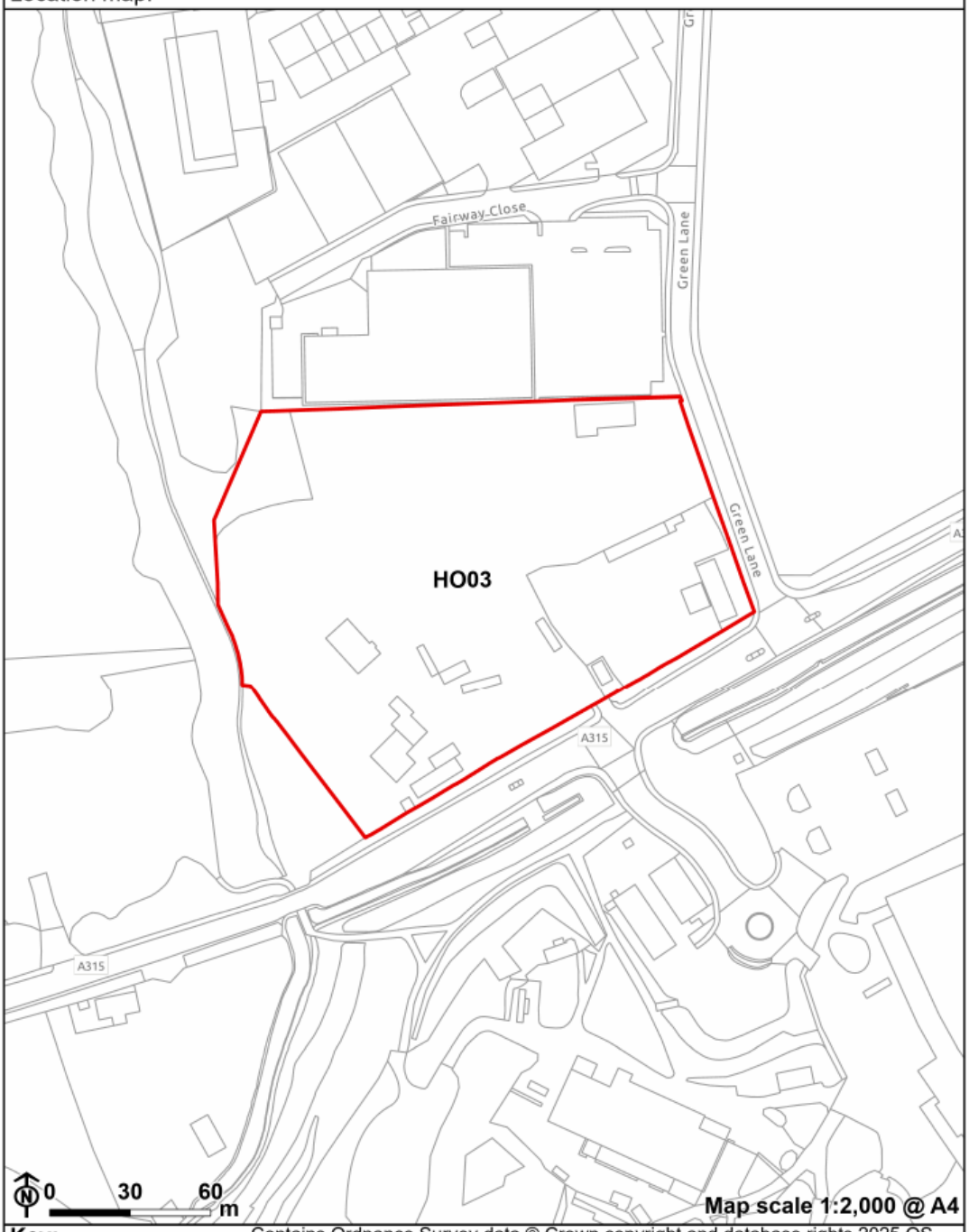


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Site Name: Site Ref:	St Albans Farm Recycling Facility (Ron Smith) HO03
Borough:	Hounslow
Location map:	

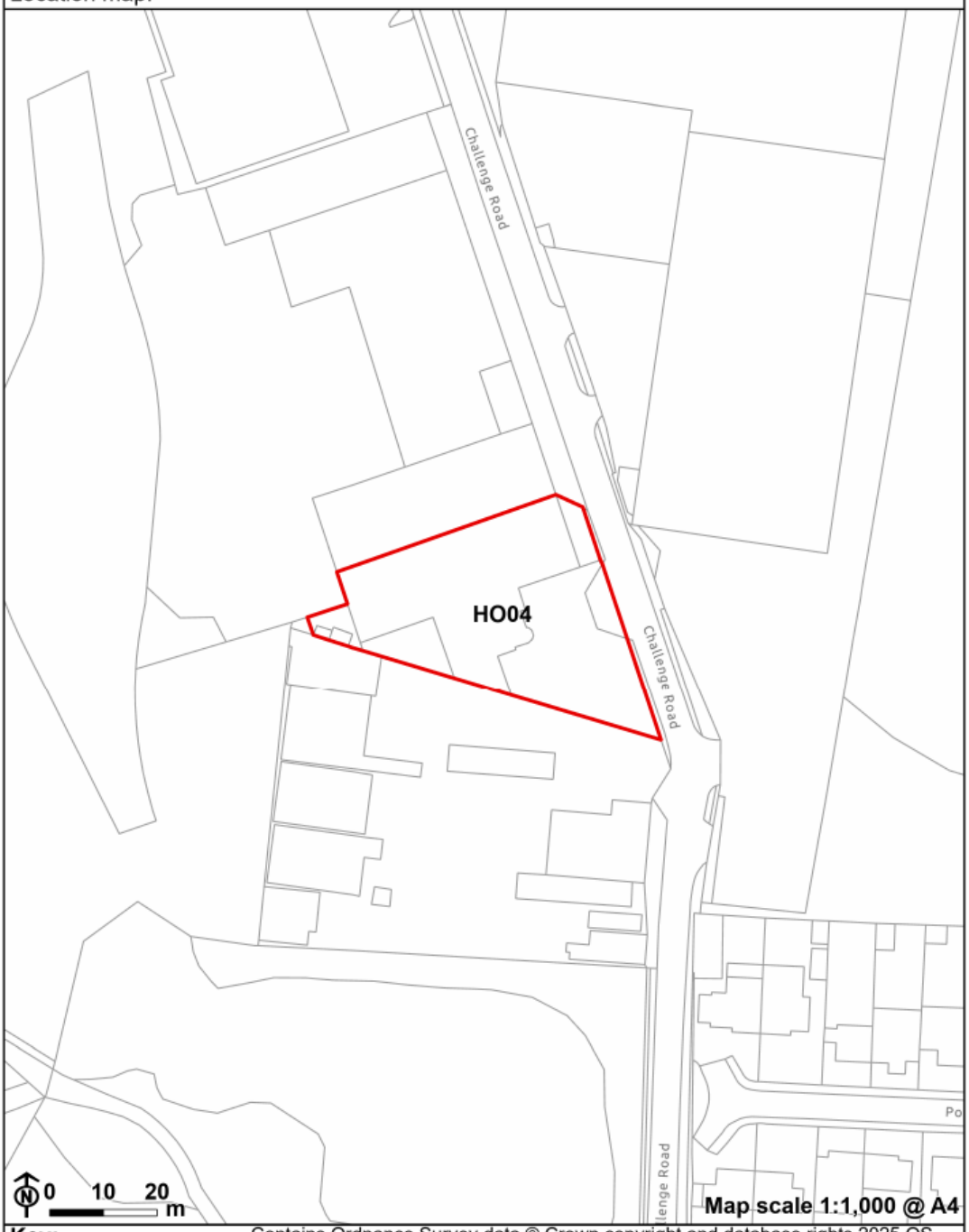


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Site Name: Site Ref:	Norris House HO04
Borough:	Hounslow
Location map:	

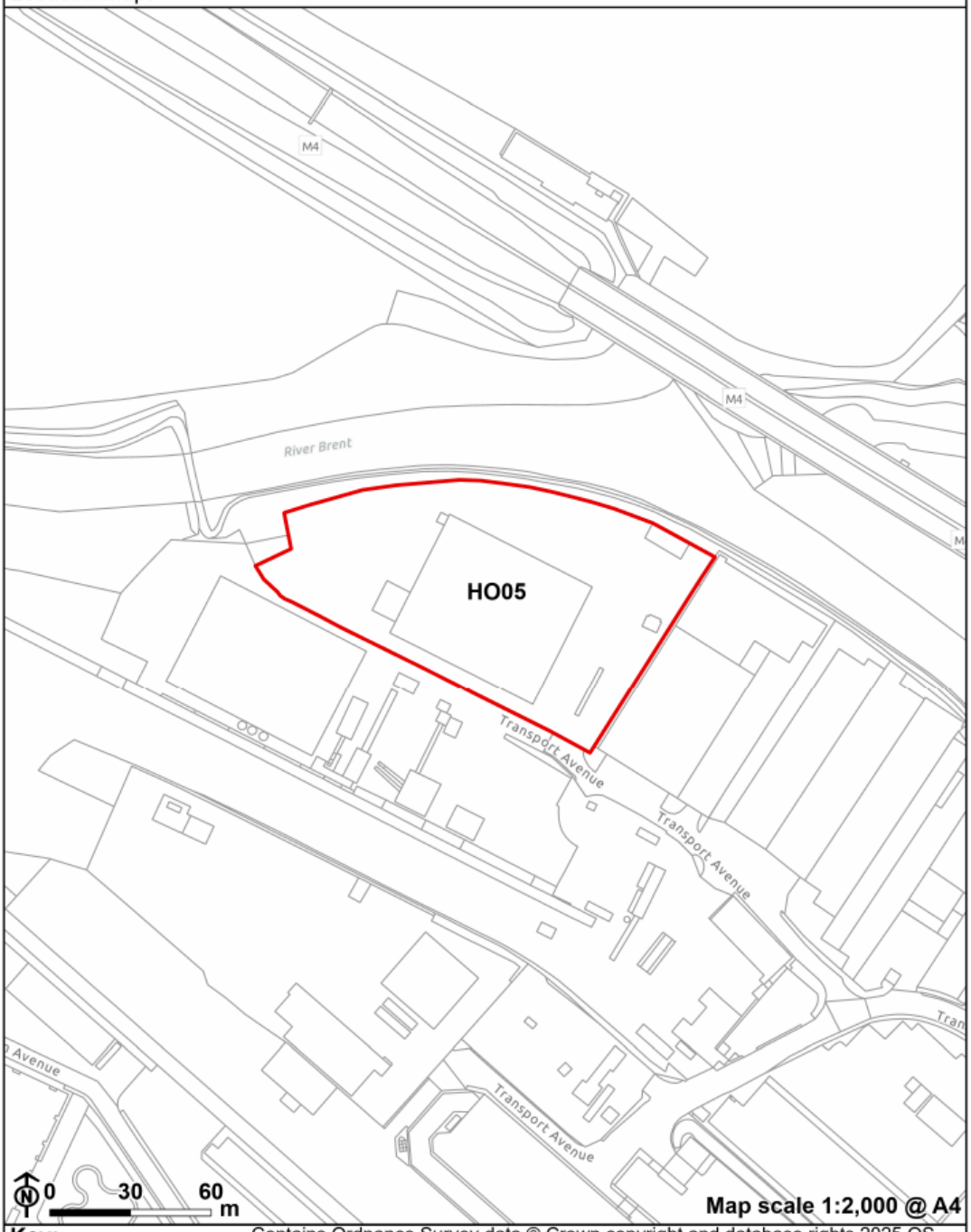


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Site Name: Site Ref:	Mayer Parry, Brentford HO05
Borough:	Hounslow
Location map:	

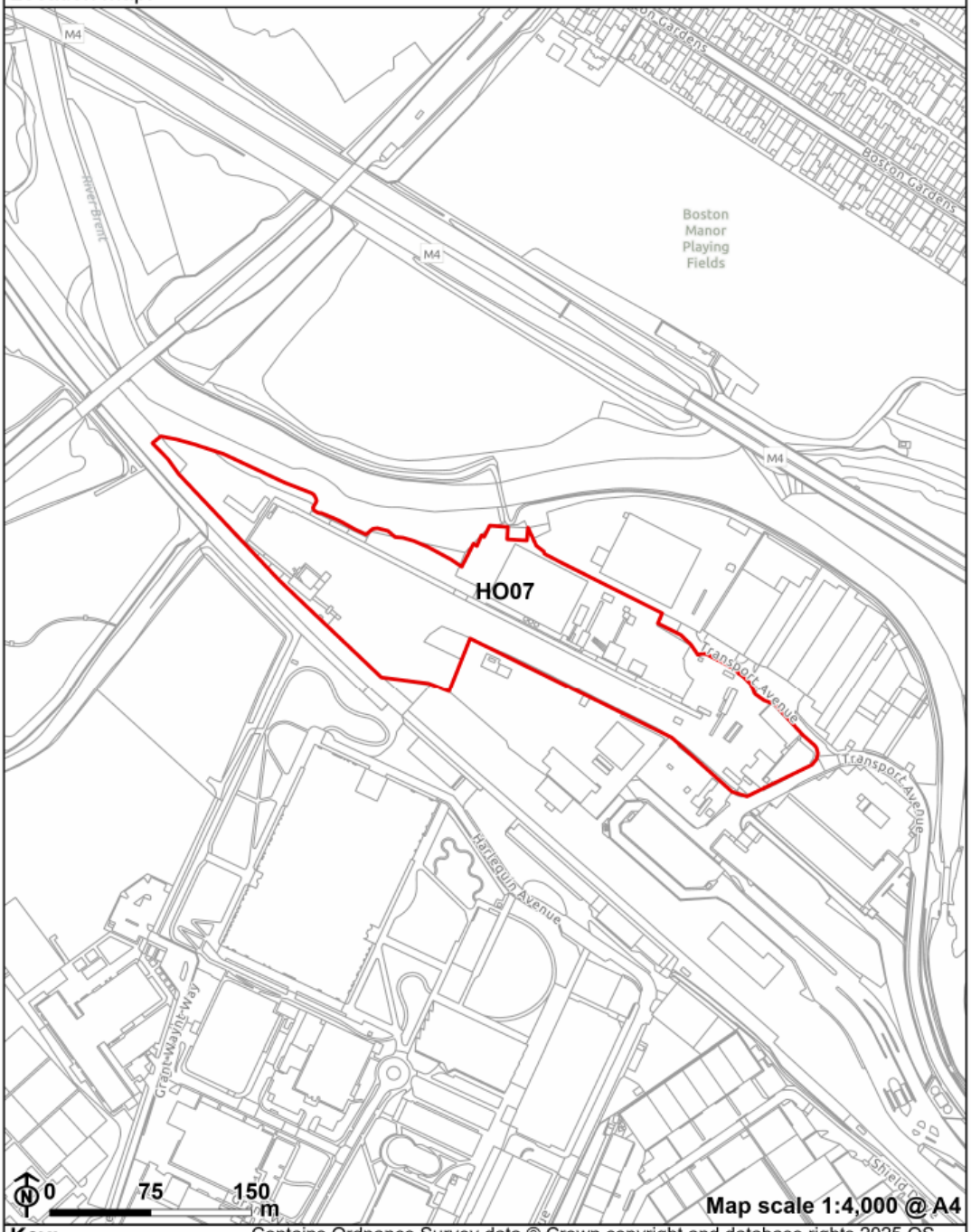


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Site Name: Site Ref:	Brentford Aggregate Materials Recycling Facility HO07
Borough:	Hounslow
Location map:	

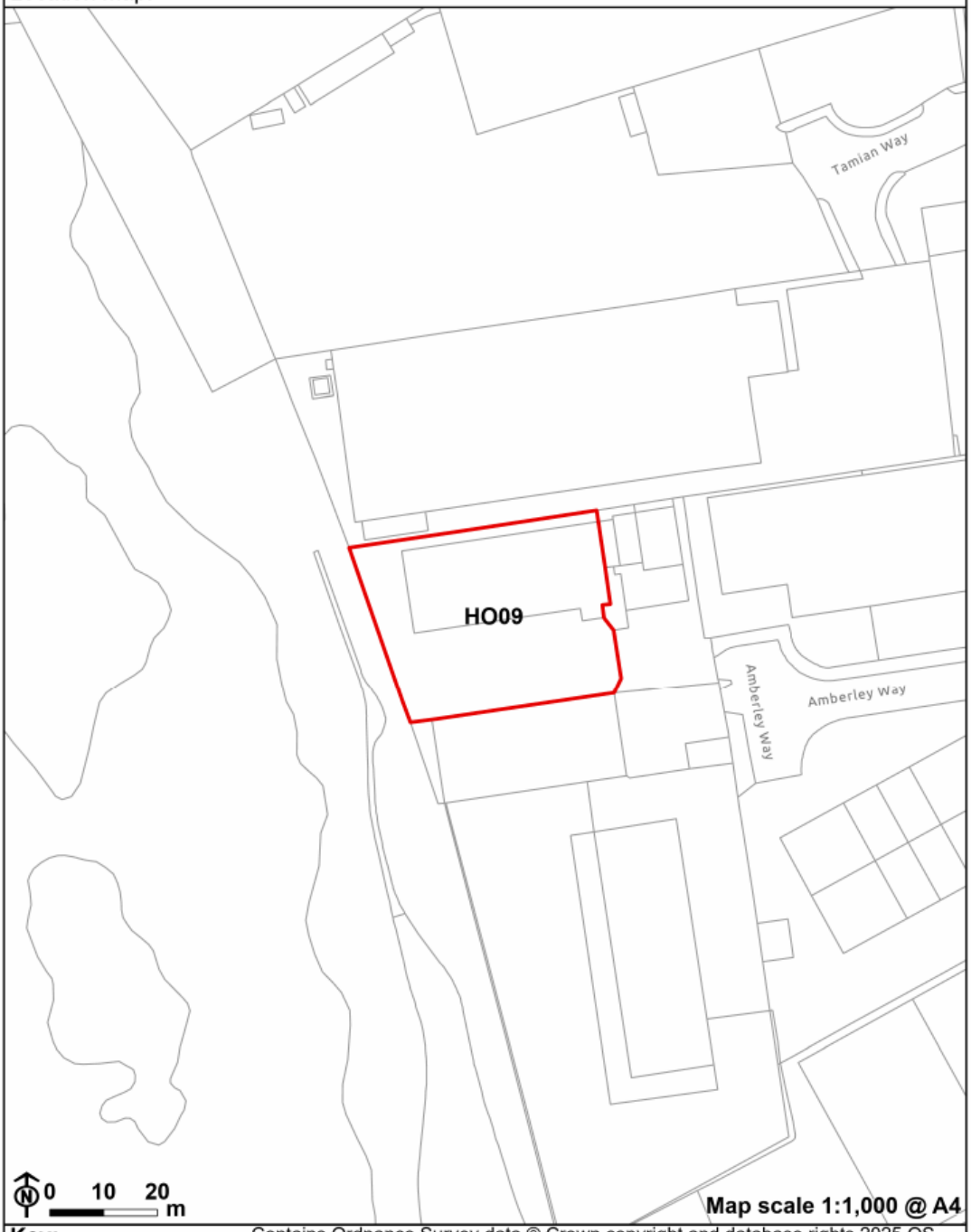


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Site Name: Site Ref:	Rubber Recycling Solutions Limited HO09
Borough:	Hounslow
Location map:	

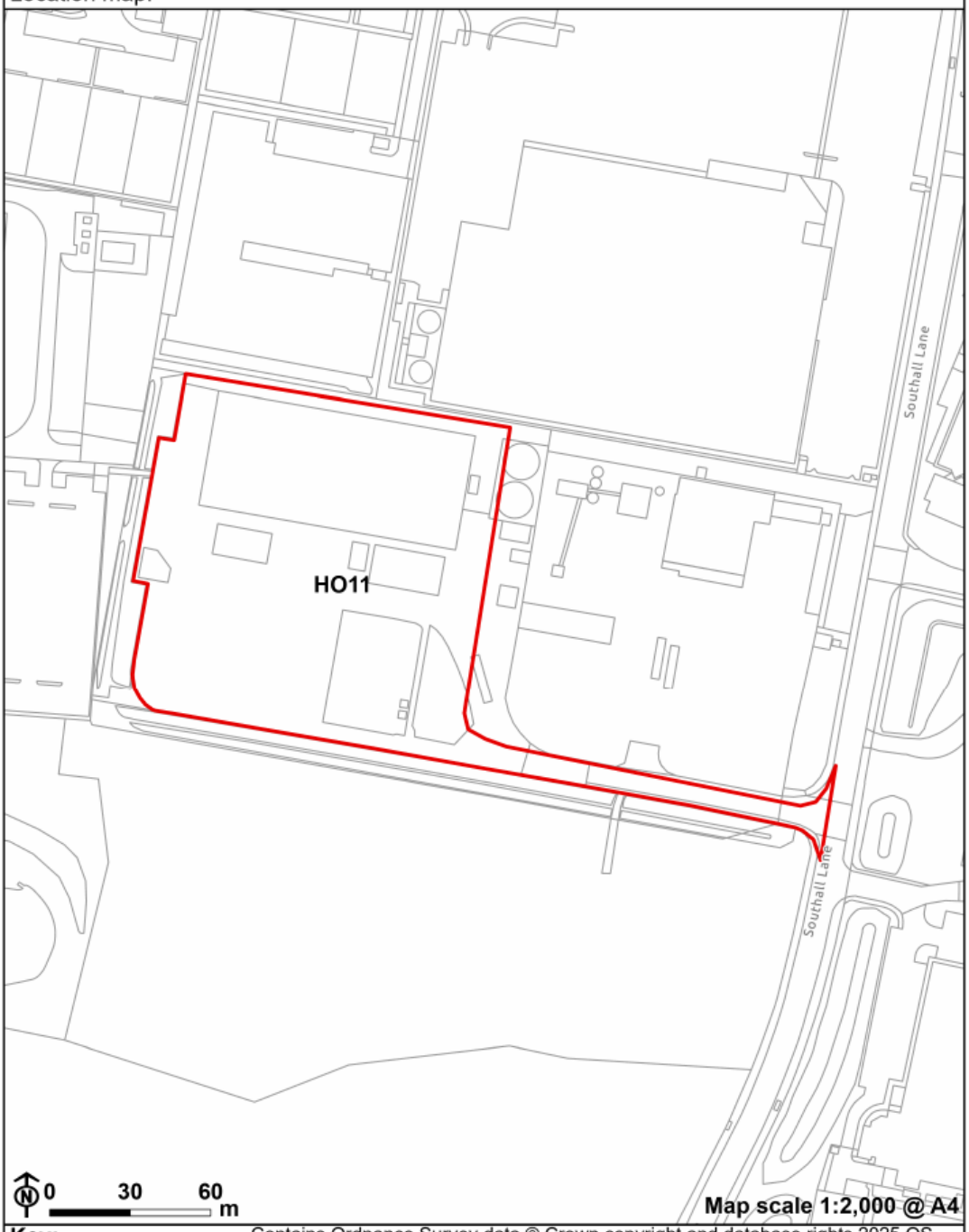


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Site Name: Site Ref:	Southall Lane Depot Western International Market HO11
Borough:	Hounslow
Location map:	

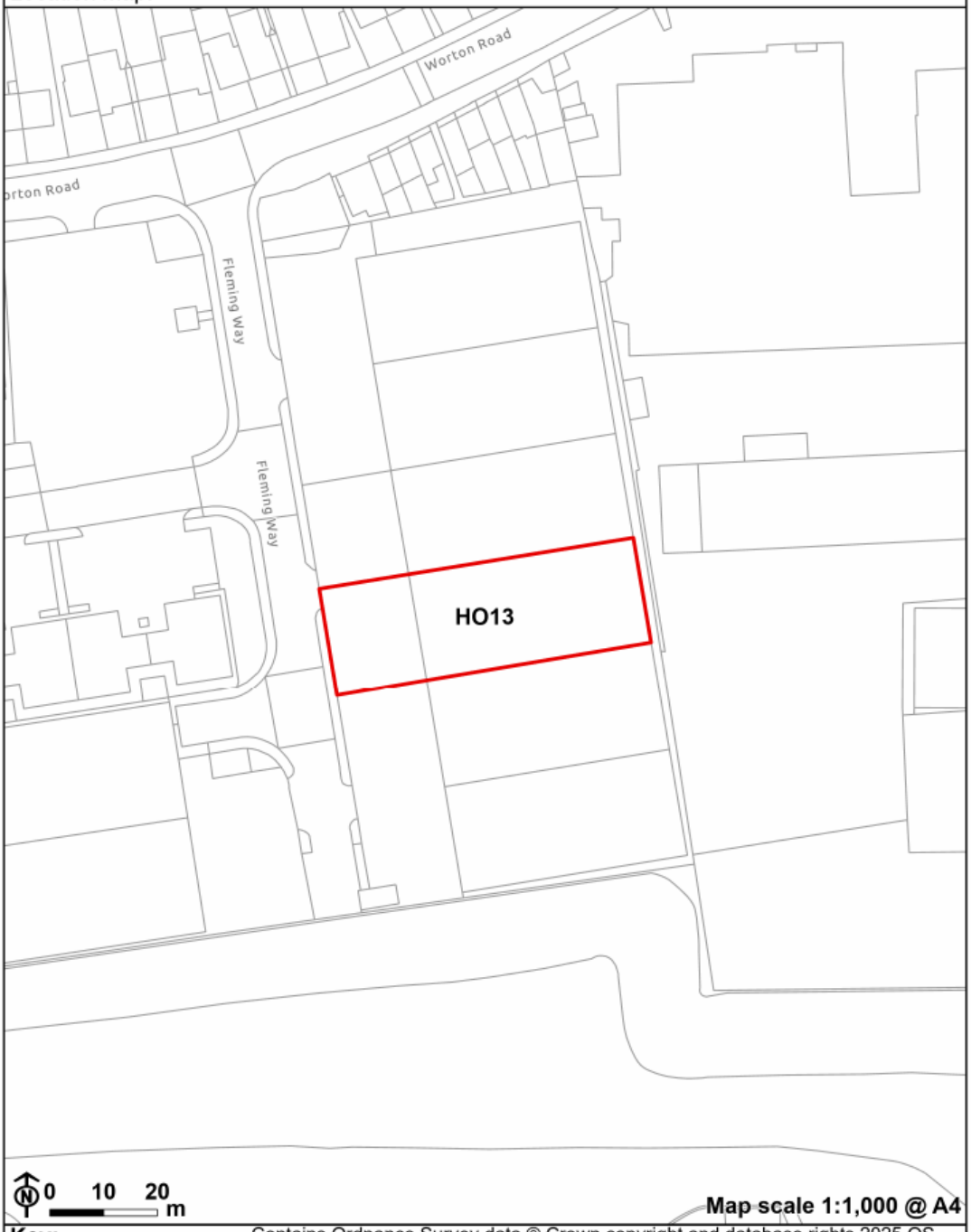


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Site Name: Site Ref:	Isleworth Site, Fleming Way Trading Estate HO13
Borough:	Hounslow
Location map:	

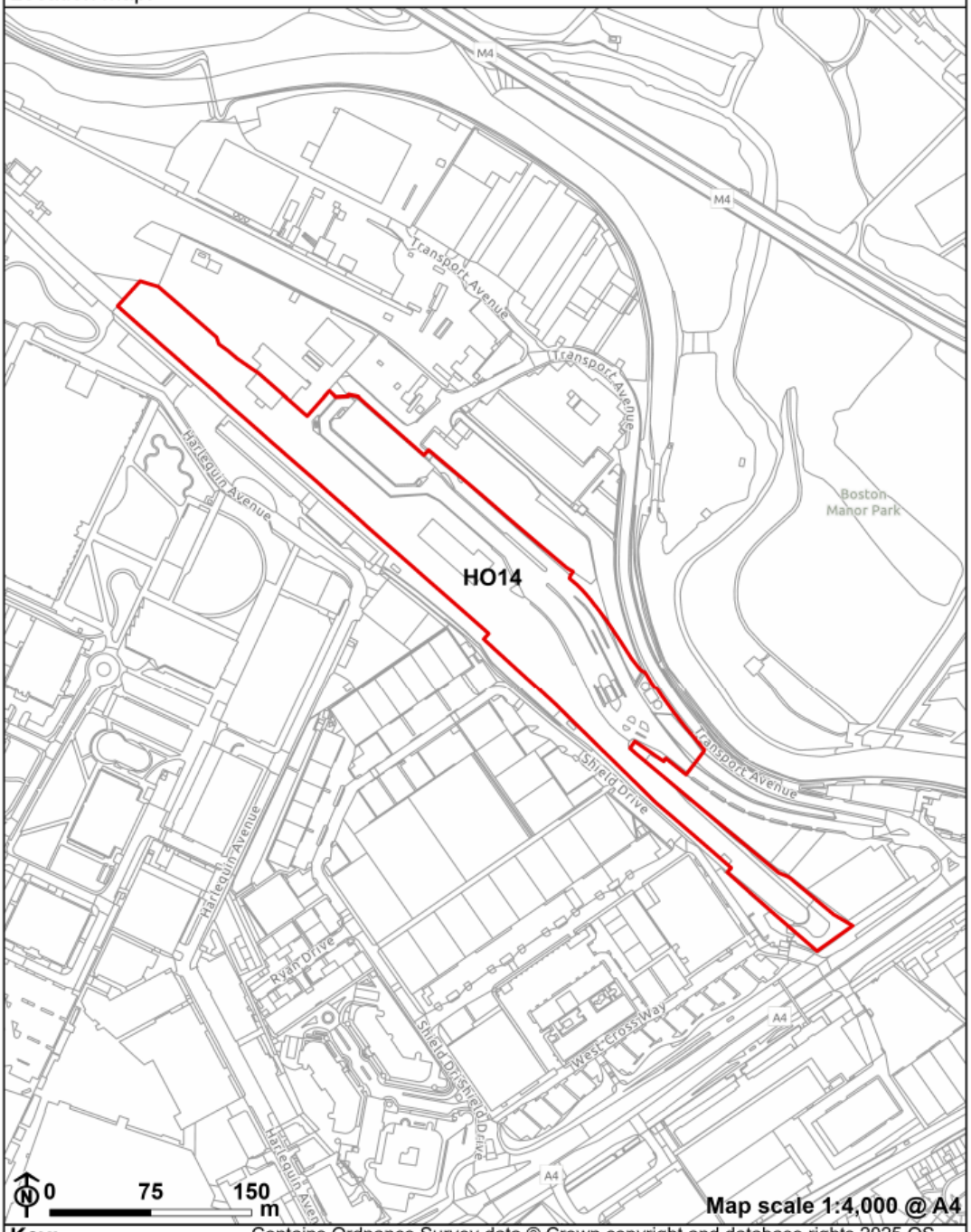


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Site Name: Site Ref:	Transport Avenue Transfer Station HO14
Borough:	Hounslow
Location map:	

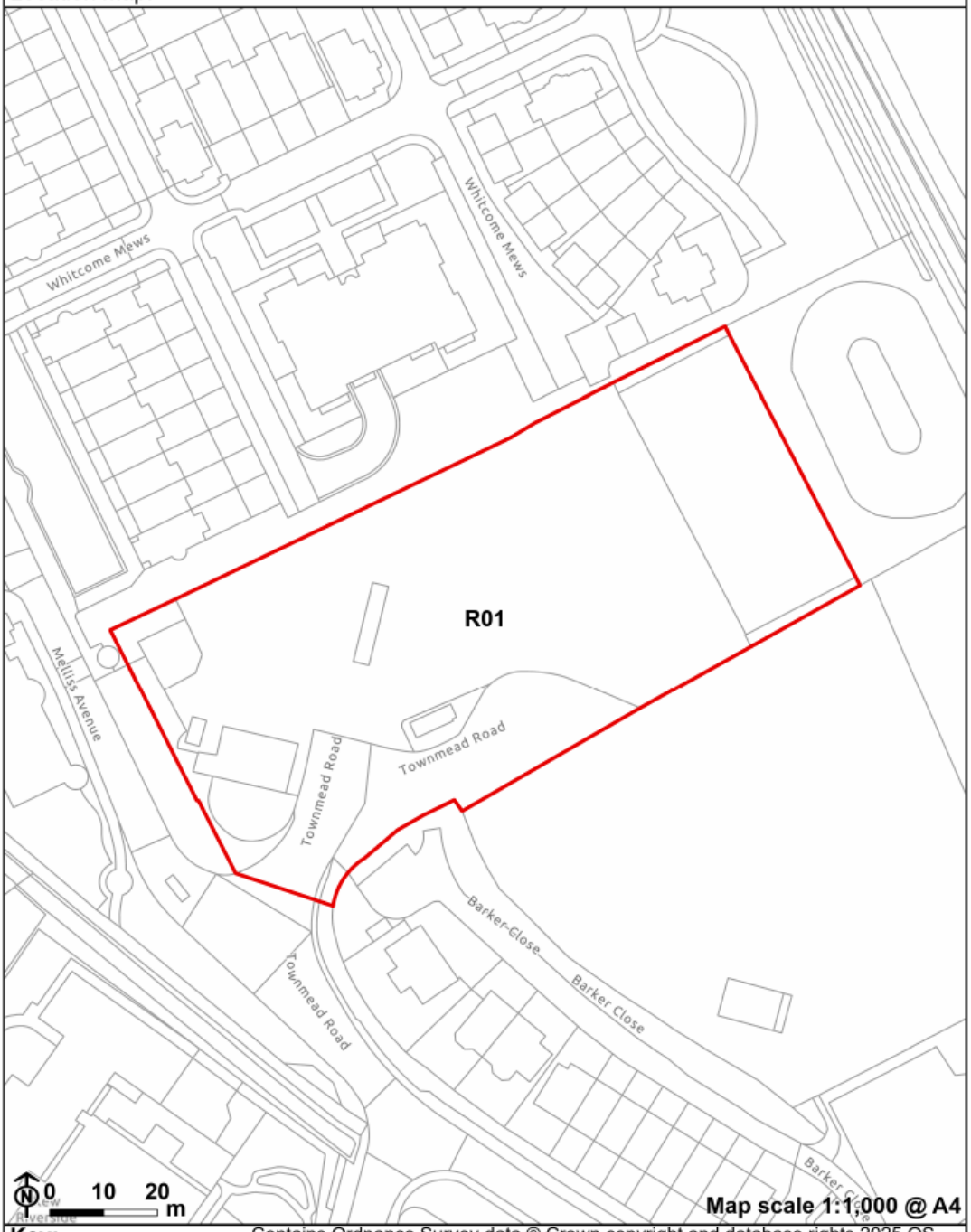


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Site Name: Site Ref:	Townmead Civic Amenity Site R01
Borough:	Richmond-upon-Thames
Location map:	

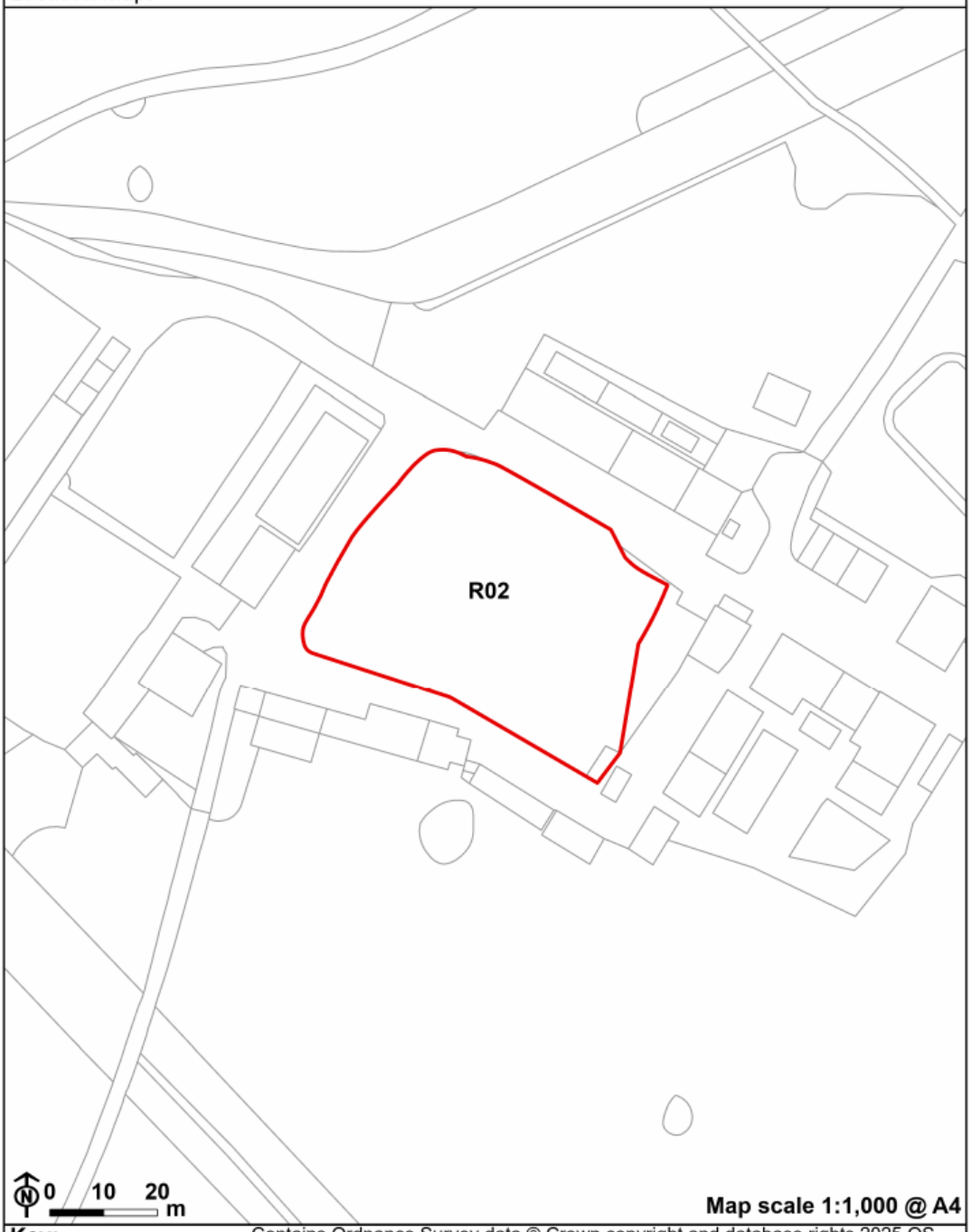


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Site Name: Site Ref:	Kew Gardens Compost R02
Borough:	Richmond-upon-Thames
Location map:	

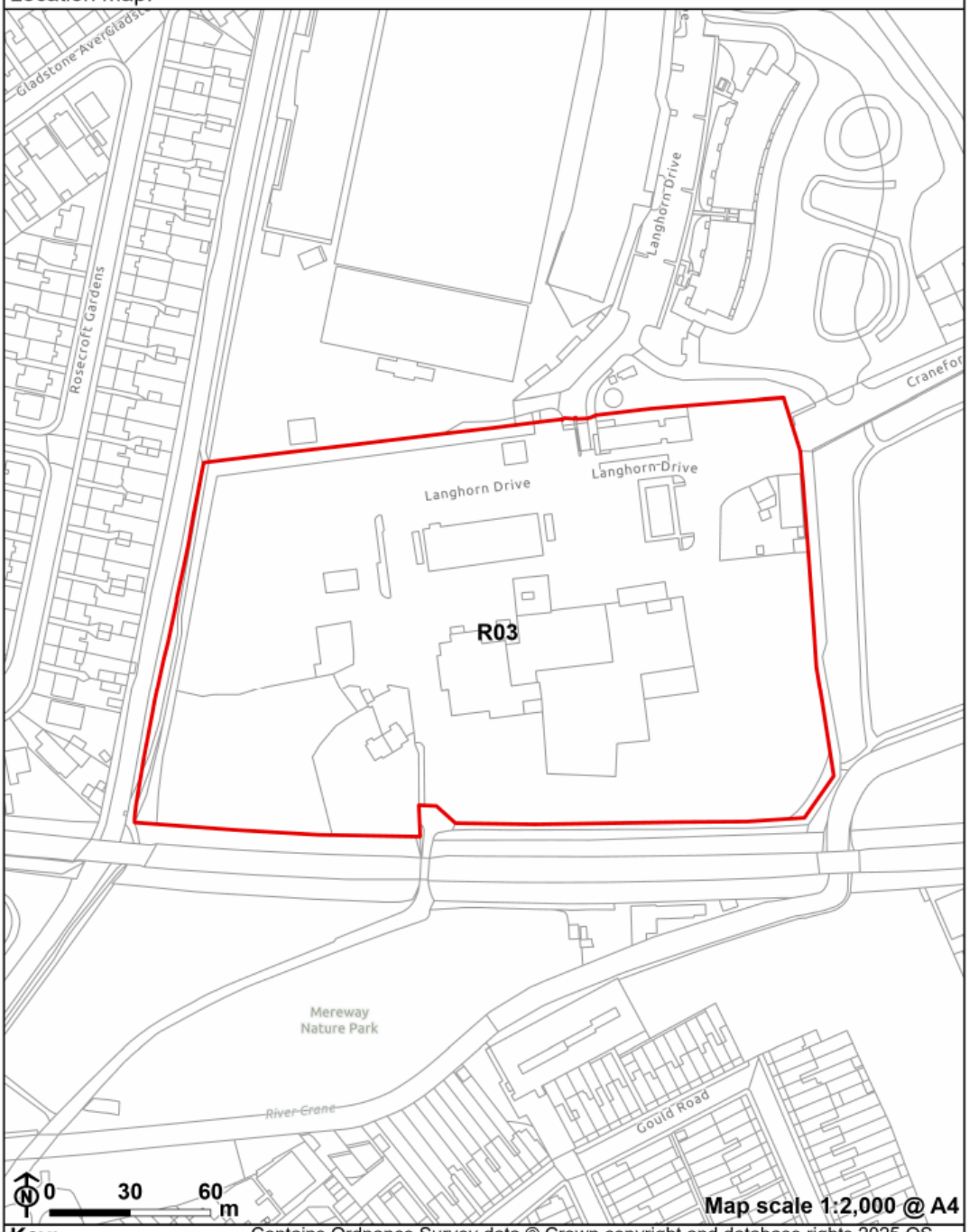


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Site Name: Site Ref:	Central Depot, Langhorn Drive Twickenham R03
Borough:	Richmond-upon-Thames
Location map:	

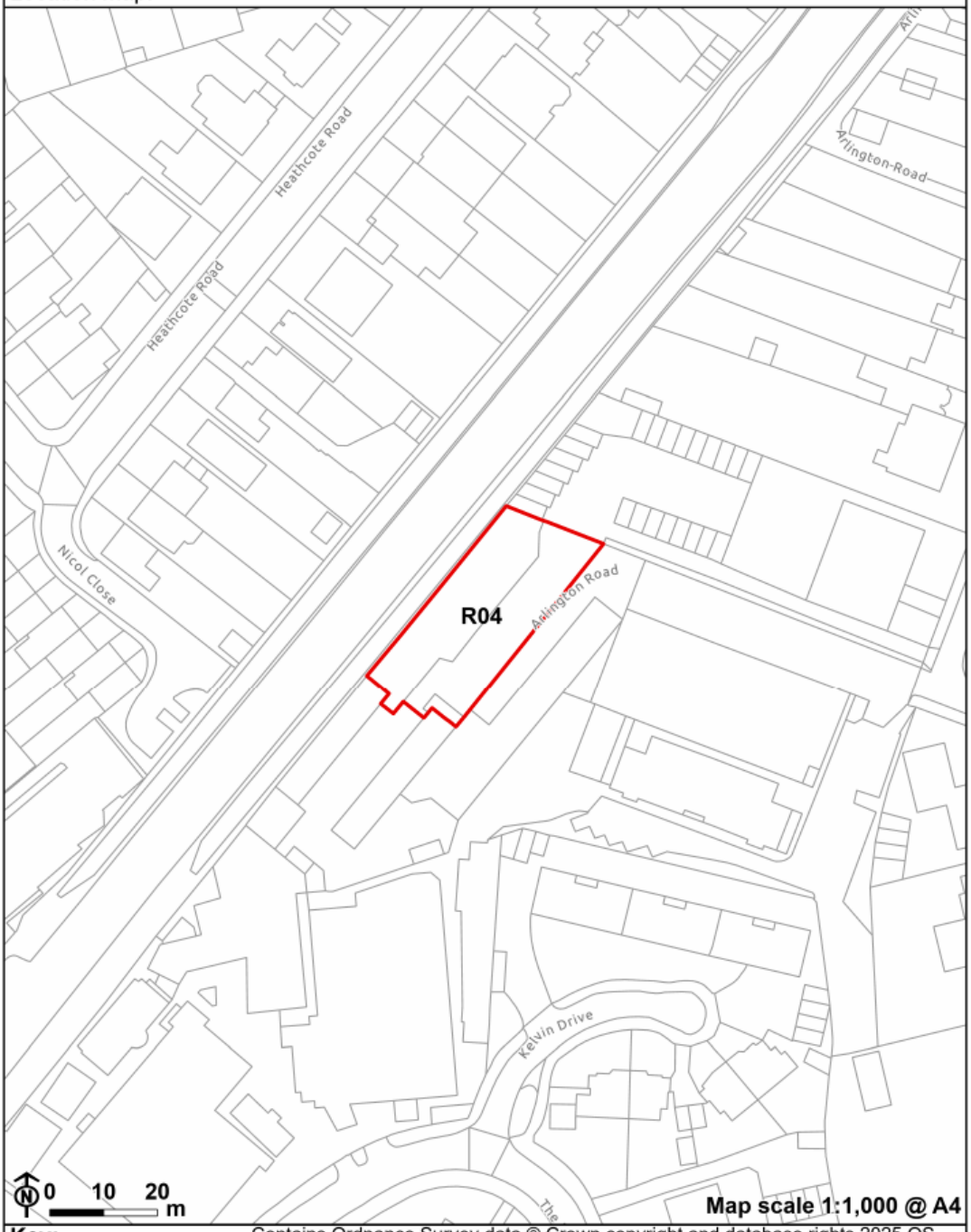


Key:

Site boundary

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Site Name: Site Ref:	Sharpes Oil, Arlington Works R04
Borough:	Richmond-upon-Thames
Location map:	



Key:

Site boundary

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Appendix 4: Replacement of Policies in the 2015 WLWP

The table below shows how the policies in the 2015 West London Waste Plan are replaced by those in this West London Waste Plan.

Policy	WLWP 2015	Policy	Replacement Policies for the WLWP
WLWP 1	Provision of New Waste Management Capacity	WLWP 2	Provision of Additional Waste Management Capacity
WLWP 2	Safeguarding and Protection of Existing and Allocated Waste Sites	WLWP 1	Safeguarding and Optimising Waste Site Network
WLWP 3	Location of Waste Development	WLWP 2	Provision of Additional Waste Management Capacity
WLWP 4	Ensuring High Quality Development	WLWP 4	Ensuring High Quality and Resilient Waste Facilities
WLWP 5	Decentralised Energy	WLWP 3	Policy WLWP3 Residual Waste Management & Energy Recovery
WLWP 6	Sustainable Site Waste Management	none	Not applicable as issues addressed through Local Plan and London Plan policies.
WLWP 7	NPPF: Presumption in Favour of Sustainable Development	none	No longer necessary as integrated into policies.

Appendix 5: Management Arrangements for West London's waste

A5.1 This section sets out how the main waste streams relevant to this WLWP are currently managed.

Management Profiles

Local Authority Collected Waste

A5.2 In 2023/24, 0.65 million tonnes of LACW was generated in west London, of which 0.43 million tonnes was managed through incineration with Energy from Waste (EfW) at facilities outside of west London, 0.2 million tonnes recycled or composted, and only 101 tonnes managed through disposal to landfill.

Commercial and Industrial Waste

A5.3 Data for the amount of C&I waste produced is not readily available but the London Plan 2021 estimates that this waste stream represented 28% of total waste arisings in London in 2015. This compares with household waste at 17% and C,D & E waste at 54%.

A5.4 The London Plan 2021 provides Borough level forecasts for arisings of HIC waste combined and these are presented in Table 3 below:

Table 3: London Plan Forecast HIC Waste Arisings for the West London Boroughs (tonnes per annum)

Borough	**2021**	**2041**
Brent	259,000	274,000
Ealing	291,000	306,000
Harrow	188,000	205,000
Hillingdon	347,000	365,000
Hounslow	260,000	275,000
Richmond upon Thames	179,000	190,000
Total	**1,524,000**	**1,615,000**

Given the known amount of LACW in 2023/24 was 0.65 million tonnes, that indicates C&I waste arisings in West London to be c1.0 million tonnes. The management profile of this waste stream is not fully understood because it is not reported separately.

Construction, Demolition and Excavation Waste

A5.5 The production of C, D & E waste is influenced by large-scale infrastructure projects, as well as commercial and residential developments, which means that peaks and troughs in its production are often observed with arisings not following a consistent pattern. Given it is a bulky and heavy waste type it does not tend to travel significant distances from source for management unless moved by rail or water.

Table 4: Non-hazardous C, D & E Waste arisings from West London 2020-2023 mean (tonnes)

Type	**Tonnes**
C&D Waste, Inert	538,506
C&D Waste, Non-inert	596,116
Total C&D Waste	***1,132,622***
Excavation Waste, Inert	2,128,422
Excavation Waste, Non-inert	3,584
Total Excavation Waste	***2,132,006***
Total non hazardous C, D & E waste	**3,266,628**

A5.6 Different types of C, D & E waste require different forms of management. For example, hard inert materials (such as concrete, brick and road scrapings arising from demolition and road maintenance) can be recycled for use as an aggregate, while soft materials such as soils and sub-soils can be used for beneficial purposes such as the restoration of minerals workings and in other engineering projects. The non-inert component includes timber, plasterboard and plastics which may be recycled if

separated. Ultimately there is very little C, D & E waste that cannot be recycled or recovered in some way.

A5.7 Excavation waste will mainly be managed through the permanent deposit on land for beneficial purposes. This may in certain cases be consented as non-waste development and, either be subject to an Environmental Permit as a recovery to land operation, or managed as non-waste under the Contaminated Land: Applications in Real Environments definition of waste protocol (DoWCoP).

A5.8 The assessed management profile for non-hazardous C, D & E waste (including inert waste) arising in west London in 2023[42] is set out in Table 5 below.

Table 5: Non-hazardous C, D & E Waste in West London - Waste Management Profile 2023 (% of Arisings of C&D waste and excavation waste separately)

Waste Category and Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D Waste Inert	25%	<1%	7%	7%	0%
C&D Waste Non-inert	25%	<1%	<1%	35%	0%
% C&D Waste	**50%**	**1%**	**7%**	**42%**	**0%**
Excavation Waste Inert	14%	65%	0%	21%	<1%
Excavation Waste Non-inert	<1%	0%	<1%	0%	0%
% Excavation	**14%**	**65%**	**<1%**	**21%**	**<1%**

A5.9 To summarise the management profile for non-hazardous C&D waste managed at permitted facilities is as set out below:

- At least 51% was managed through recycling or recovery

[42] 2023 Waste Data Interrogator (WDI) was the most current dataset available at the time the Plan was initially written.

- With 7% disposed at permitted landfills
- 42% transferred on for recovery or disposal

A5.10 Waste going for re-use may not be managed through permitted sites, plus a substantial proportion of C&D waste that constitutes hardcore may be converted into recycled aggregate and either used on site or sold offsite[43]. Hence the recycled/recovery value of 51% should be taken to be a minimum.

A5.11 The management profile for non-hazardous excavation waste is as below:

- Just less than 80% was managed through recycling or recovery
- With <1% of the remainder disposed at permitted landfills
- c.21% transferred on for recovery or disposal

Given that disposal of this type of waste would only be to landfill, and backfilling of mineral workings and other uses would be classed as recovery, it is considered highly unlikely that the inert fraction of this stream would end up being substantially disposed of.

A5.12 The profile above compares with the targets for C, D & E waste management in Policy SI 7 of the London Plan (Reducing waste and supporting the circular economy) to meet or exceed the targets for each of the following waste streams:

- construction and demolition – 95 per cent reuse/recycling/recovered
- excavation – 95 per cent beneficial use overall and 100% of inert excavation beneficial used[44].

[43] Data provided by the National Federation of Demolition Contractors.

[44] London Plan Footnote 164

Hazardous Waste

A5.13 It has been estimated that around 52,500 tonnes of hazardous waste was produced in west London in 2023. The term, hazardous waste, covers a wide range of waste types which each may require management at specialist facilities, and given they generally arise in relatively small amounts, such facilities are usually developed to manage quantities greater than that which would arise in a single Plan area.

A5.14 The principal types of hazardous waste that arose in west London making up 90% of the total arisings in 2023 are presented in Table **6** below. The five principal hazardous waste streams arose from:

- construction activity
- oil and water separator cleaning
- vehicle maintenance and depolluting end of life vehicles (ELV)
- infectious clinical waste
- waste electrical and electronic equipment (WEEE)

Table 6: Principal Hazardous Waste Component Arisings in West London 2023

Source: HWI 2023 (Environment Agency)

Hazardous Waste Type/Source	**2023**
C, D & E Waste	22,721
Oil and Water Separator Waste	7,159
Infectious Clinical Waste	6,323
WEEE	5,499
Vehicle Maintenance & ELV depollution	4,018
Total	**45,720**[45]

[45] Totals less than the 52,500t total above as these are the principal waste components.

Flows to and from West London

A5.15 Analysis of the best available data shows that significant quantities of waste are routinely transported between west London and other Waste Planning Authority (WPA) areas[46]. This cross-boundary movement is typical of the way in which waste is managed in general. Table 7 shows the balance between waste exported from west London and received at west London waste management facilities in 2023. This indicates that overall, a balance is achieved with the exported amount equating to the imported amount. The totals shown in Table **7** do not correspond to the arisings totals given for each waste stream above. This is because an additional tonnage of C, D & E waste has been accounted for, that is not actually attributed to west London in the source dataset[47], the Waste Data Interrogator (WDI), and therefore cannot be allocated by management location.

Table 7 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

Waste Arising Area	**Waste Management Area**	**Tonnes**
West London	Outside West London	2,806,945
West London	West London	869,932
Outside West London	West London	2,796,481
All areas	West London	3,666,413
West London	All, West London and outside	3,676,877

[46] See '*Identification of Strategically Significant Cross Boundary Waste Movements from West London'*, BPP Consulting, October 2025

[47] See *Construction, Demolition & Excavation Waste Arising in West London to 2041* BPP Consulting October 2025

A5.16 **Figure 7** displays the balance between imports and exports by waste management method and waste type to and from west London in 2023[48].

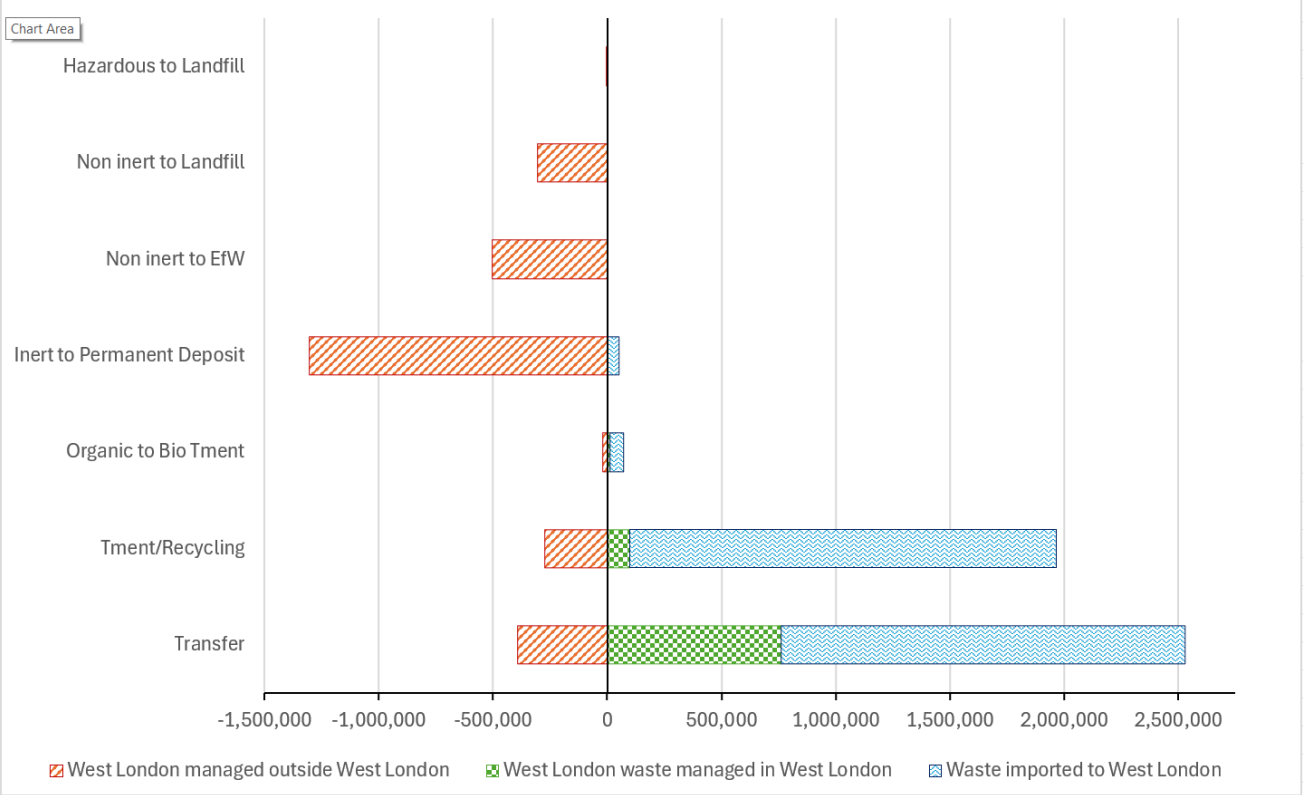


Figure 7: Flows of Waste for Management at Permitted Facilities

A5.17 Certain flows of waste from west London have been assessed to be of a strategic nature to the management of waste arising in west London over the Plan period. The WPAs hosting the receiving facilities of this waste have been contacted to confirm that such flows may continue over the Plan period.

[48] Note that Figure 6 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.

Appendix 6: Existing Waste Sites Proposed for Release from Safeguarding showing Assessed Peak Waste Capacity (tpa)

Site	Consented Use	HIC	CDEW	Haz
Unit 8 Initial Washrooms (Brentford) Service Centre (Hounslow)	Waste transfer	2,156	0	1,094
Atlas Wharf, Atlas Road (OPDC)		0	65,382	0
Formerly Quattro, Victoria Road (OPDC)	Waste transfer	0	0	0
Mitre Works, Neasden Lane (European Metal Recycling Ltd) (Brent)	Metal recycling	16,490	0	0
Land at Neasden Goods Yard (X-Bert Haulage)	Waste transfer	0	60,254	0
Unit 6 Neasden Goods Yard (X-Bert Haulage) (Brent)	Waste transfer	0	83,722	0
Totals		**18,646**	**209,359**	**1,094**

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Integrated Impact Assessment for the West London Waste Plan

Regulation 19 Consultation

West London Waste Planning Authorities

Final report

Prepared by LUC

May 2026

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Chapter 1
Introduction

1.1 LUC was commissioned in October 2023 to undertake an Integrated Impact Assessment (IIA), comprising Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA), and Habitats Regulations Assessment (HRA) for the Regulation 19 West London Waste Plan (WLWP).

1.2 Production of the WLWP is a collaborative venture between the following local planning authorities:

- London Borough of Brent;
- London Borough of Ealing;
- London Borough of Harrow;
- London Borough of Hillingdon;
- London Borough of Hounslow;
- London Borough of Richmond upon Thames; and
- the Old Oak and Park Royal Development Corporation (OPDC).

1.3 This document is the IIA of the Regulation 19 WLWP. The IIA appraises the likely effects of the vision, objectives and policies. This document will be published as part of the consultation on the Regulation 19 WLWP.

1.4 An IIA of the emerging draft WLWP was prepared and issued for consultation as part of the Regulation 18 requirements from December 2025 to February 2026. This updated Regulation 19 version of the IIA incorporates comments received as part of the Regulation 18 consultation process and takes account of updates made to the WLWP following the Regulation 18 consultation.

1.5 It should be noted that this report is in an 'Accessible format', which means it has been formatted to meet the requirements of the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations (2018), as set out in the Web Content Accessibility Guidelines (WCAG 2.1). This means it must have larger font, larger spacing between lines and headings, less information presented in tables, 'alt text' provided for all figures and it is able to be read by screen-reading software.

Geographical context for the West London Waste Plan

1.6 The WLWP area is formed by the six westerly London Boroughs: Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames. The emerging WLWP also includes the area covered by the Old Oak and Park Royal Development Corporation (OPDC) within Brent and Ealing. The OPDC is a Mayoral Development Corporation (MDC), established by the Mayor of London to secure the regeneration of the Old Oak and Park Royal Opportunity area, spanning land in three London boroughs – Ealing, Brent, and Hammersmith and Fulham.

1.7 The administrative geography of London is overseen at a regional level by the Greater London Authority (GLA). There are 33 administrative areas within London: 12 inner boroughs, 20 outer boroughs, and the City of London. The WLWP area sits within outer London. The plan area is bordered within London:

- To the east by the London Borough of Barnet and the London Borough of Camden; and
- To the southeast by the London Borough of Westminster, the London Borough of Kensington and Chelsea, the London Borough of Hammersmith & Fulham, the London Borough of Kingston upon Thames, and the London Borough of Wandsworth.

1.8 The Plan area shares borders with planning authority areas outside London as follows:

- To the north within the county of Hertfordshire, are the districts of Three Rivers and Hertsmere.
- To the west are the unitary authorities of Buckinghamshire, Slough, and Windsor and Maidenhead, as well as the Surrey county districts of Spelthorne and Elmbridge.

1.9 The population of the WLWP area has grown from 1.6m in the 2011 Census to over 1.75m in the 2021 Census **[See reference 1]**. The London Plan predicts that the population of London as a whole is projected to increase by 70,000 every year, reaching 10.8 million in 2041, and growth in West London will be supported by the development of High Speed 2 (HS2), Crossrail 2 and within the OPDC area **[See reference 2]**.

1.10 West London is a diverse area, including urban centres, industrial hubs, transport corridors, and extensive green spaces. Waste management development in this area is principally affected by:

- Strategic industrial clusters providing key locations for waste management facilities;
- Major regeneration areas have been identified for significant new development of homes and employment space, which could increase waste production and impact waste sites but also create opportunities to plan for innovative and sustainable waste solutions;
- Development constraints such as:
  - Residential areas and other conflicting land uses;
  - Green Belt;
  - Metropolitan Open Land (MOL);
  - Heritage and conservation designations;
  - Ecological designations;
  - Flood risk zones;
  - Air Quality Management Areas (AQMAs); and

- Transport infrastructure, including key road and rail freight networks and interchanges, that affect waste logistics.

Borough by Borough Summary Profile (alphabetical order)

1.11 The London Borough of Brent (LBB) is located in the north east of the plan area, with Harrow to the north and Ealing to the south. There are currently 15 permitted waste management facilities operational within the Borough.

- Key industrial locations for waste management development include Wembley Strategic Industrial Location (SIL) and Alperton Locally Significant Industrial Site (LSIS). East Lane SIL and other industrial areas may also offer opportunities for waste development in the future.
- The main growth and regeneration areas including Wembley, Alperton and the Neasden Stations Growth Area will grow through high-density development, requiring integrated waste solutions to facilitate management of separate waste streams.
- Major transport routes are provided by the North Circular (A406), A5, and M1, but, like all of the plan area, congestion is an issue across the Borough.
- Designations such as the borough-wide AQMA, Air Quality Focus Areas (AQFAs), the Welsh Harp reservoir SSSI and flood risk along the River Brent and Wealdstone Brook may limit further waste development.

1.12 The London Borough of Ealing (LBE) is located in the central section of the plan area with Harrow and Brent to the north, Hillingdon to the west, and Hounslow and Richmond to the south. There are currently 19 permitted waste management facilities operational within the Borough.

- The main locations for waste transfer and recycling facilities are the Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) in Greenford, Perivale, Northolt, and Southall.

- Regeneration pressures in the Southall Opportunity Area is expected to increase waste production and require integration with the circular economy.
- The main transport routes are the A40, A406 and Uxbridge Road. There is potential for the development of rail-based freight locations for waste transport.
- The designated borough-wide AQMA, Green Belt and potential flood risk along the River Brent, and in Southall and Acton may limit further waste development.

1.13 The London Borough of Harrow is located to the north of the plan area with Brent, Ealing and Hillingdon to the south. There are two permitted waste management facilities operational within the Borough.

- There is relatively limited industrial land within the Borough. The main areas are Wealdstone (SIL and LSIS) and Honeypot Lane.
- Harrow and Wealdstone is identified in the London Plan as an Opportunity Area (OA) which are significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. The Harrow and Wealdstone OA is part of the Highspeed 2/Thameslink Growth Corridor. Growth in these town centres is expected to increase waste production, but space for new stand alone waste management facilities is limited.
- Compared to the other Boroughs in the plan area, a lack of major highway or rail freight connections, make waste transport more reliant on local road networks.
- The borough-wide AQMA and Green Belt land may limit further waste development.

1.14 London Borough of Hillingdon (LBHi) sits to the west of the plan area with Harrow and Ealing to the east, and Hounslow to the south. There are 34 permitted waste management facilities operational within the Borough.

- The key industrial and transport hubs are Heathrow Airport and Hayes & West Drayton Corridor which produce significant quantities of commercial and industrial (C&I) waste.

- There are existing waste infrastructure locations at West Drayton Waste Transfer Station, South Hillingdon Recycling Centre and Harmondsworth Quarry/Sipson (historic mineral workings).
- Key transport routes include the M4, A40, M25 and West Drayton Rail Freight Terminal. There is potential for waste transport by rail and already one rail transfer station at Victoria Road. There is also the potential to transport waste by water freight and key transport routes could include the Grand Union Canal, River Thames and Brentford wharf.
- The designated AQMA covering three quarters of the borough, Green Belt, and potential flood risk from the River Colne and Grand Union Canal may limit further waste development.

1.15 The London Borough of Hounslow (LBHo) sits to the south west of the plan area, with Richmond to the south east and Hillingdon and Ealing to the north. There are currently 12 permitted waste management facilities operational within the Borough.

- The key Strategic Industrial Locations for waste management facilities are the Great West Corridor, North Feltham Trading Estate, and Brentford.
- Regeneration opportunities in the Great West Corridor Opportunity Area and the Hounslow part of the Heathrow Opportunity Area (aka the ‘West of the Borough’ area, which includes Feltham Town Centre) are expected to increase waste management requirements.
- Strategic road connections include the M4 and rail freight at Brentford sidings and rail transfer station at Transport Avenue.
- The designated borough-wide AQMA, Green Belt, and potential flood risk from the River Thames and its tributaries, as well as surface water and groundwater influenced flooding may limit further waste development.

1.16 The London Borough of Richmond upon Thames (LBR) is located in the very south of the plan area, with Hounslow to the north. There are four permitted waste management facilities located within the borough but only three of these sites are currently operational.

- Smallest industrial base in West London - Limited industrial land, with waste facilities concentrated at Townmead Road Household Waste and Twickenham Depot.
- Regeneration and waste growth - Mortlake (Stag Brewery redevelopment), Twickenham and Richmond town centre redevelopment are expected to increase waste generation.
- Other key development constraints include:
  - Borough-wide AQMA,
  - Richmond Park (NNR, SSSI and SAC, Historic Park and Garden), Bushy Park and Home Park (SSSI, Historic Park and Garden), Kew Gardens (UNESCO World Heritage Site),
  - Green Belt, Metropolitan Open Land (MOL) and Other Open Land of Townscape Importance (OOLTI), and
  - Flood risk from the River Thames and its tributaries, as well as surface water and groundwater influenced flooding, which can also lead to sewer overflows.
  - Transport considerations - limited road capacity for HGV waste transport and although there is potential to transport waste by water freight practicalities of accessing the river from waste sites and potential costs involved limit the extent of its use.

1.17 The Old Oak and Park Royal Development Corporation (OPDC) is a Mayoral Development Corporation (MDC), established by the Mayor of London to secure the regeneration of the Old Oak and Park Royal Opportunity area, spanning land in three London boroughs – Ealing, Brent (within the WLWP area), and Hammersmith & Fulham.

- The OPDC contains London’s largest SIL which accommodates over 2,000 businesses. Key sectors include transport and logistics, food manufacturing and creative industries.
- The 2022 adopted OPDC Local Plan identifies the potential to deliver up to 19,850 new homes and space for 36,350 jobs up to 2038 with more planned in later stages. It includes one of the UK’s largest regeneration projects at Old

Oak, which includes planned construction of infrastructure and up to 9,000 new homes and thousands of new jobs, with opportunities to use advanced waste solutions and apply circular economy principles.

- Existing waste management sites are located in SIL or outside of this, within proposed major, mixed-use neighbourhoods.
- Key transport routes include the A40 and A406. There are multiple existing and future planned rail connections which provide potential for non-road based waste transport.
- The designated AQMA covering the whole OPDC, proximity to Wormwood Scrubs Metropolitan Open Land (MOL) and potential flood risk from the Grand Union Canal, alongside surface water flooding, may limit development. Development may also be impacted temporarily by HS2 construction.

1.18 Due to the location of the plan area, the WLWP area benefits from strategic transport links including access to the M1, M4 and M25 motorways, and the A3, A4, A30, A40 and A406.

West London Waste Plan

1.19 The current version of the WLWP was adopted in 2015 **[See reference 3]** and set out to meet the requirements of the national policy and the London Plan (2011), to plan effectively for waste across the WLWP area and London's wider needs as set out in the apportionments in the London Plan, as amended by the Further Alterations to the London Plan (2015). There have been two iterations of the London Plan since adoption of the West London Waste Plan: the London Plan (2016), and the current adopted London Plan (2021). A new version of the Draft London Plan (2026) is due to be published for consultation this summer.

1.20 The adopted WLWP was prepared under the original National Planning Policy Framework (NPPF 2012), the National Waste Plan for England (2013), and the National Planning Policy for Waste (NPPW, 2014). To meet the London Plan apportionments for municipal solid waste (MSW) and commercial and industrial (C&I) waste, the adopted WLWP allocated seven existing waste sites already managing

MSW and C&I waste identified as capable of redevelopment to increase their waste recovery capacity, and an additional suitable site not currently developed for waste management use.

1.21 No allocations were made in the adopted WLWP for construction and demolition (C&D) waste facilities or for hazardous waste management. The plan was designed to be flexible to allow for developments and improvements in waste management technologies and the changing habits of consumers and waste producers.

1.22 The WLWP is now being reviewed, and once adopted, the new WLWP will supersede the adopted WLWP and form part of the development plan against which planning applications for waste management facilities across the plan area will be determined. The evidence base prepared for the emerging WLWP does not indicate that additional capacity is needed, which would justify the allocation of additional land for the development of new waste facilities in the plan.

Sustainability Appraisal and Strategic Environmental Assessment

1.23 Under the amended Planning and Compulsory Purchase Act 2004 **[See reference 4]**, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC) as transposed into law in England by the SEA Regulations **[See reference 5]**, which currently remain in force despite the UK exiting the European Union in January 2020. Therefore, it is a legal requirement for the WLWP to be subject to SA and SEA throughout its preparation.

1.24 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the national Planning Practice Guidance **[See reference 6]**), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA process – this is the process that is being undertaken for the WLWP, as part of the wider IIA. From

here on, the term ‘SA’ should therefore be taken to mean ‘SA incorporating the requirements of the SEA Regulations’.

1.25 The SA process comprises a number of stages, which are being undertaken as part of the IIA, as shown below. The SA is currently at Stage D, which is a second round of consulting on the WLWP and the SA Report (the first was at the Regulation 18 stage from December 2025 to February 2026).

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.

Stage B: Developing and refining options and assessing effects.

Stage C: Preparing the SA (or IIA) Report.

Stage D: Consulting on the WLWP and the SA (or IIA) Report.

Stage E: Monitoring the significant effects of implementing the WLWP.

Health Impact Assessment

1.26 Although not a statutory requirement, Health Impact Assessment (HIA) aims to ensure that health-related issues are integrated into the plan-making process. The HIA of the WLWP has been carried out as part of the IIA by ensuring that the IIA objectives against which the Plan is appraised address relevant health issues. Recommendations will be made if relevant in relation to how the health-related impacts of the Plan can be optimised as the options are developed into detailed policies.

Equalities Impact Assessment

1.27 The requirement to undertake formal Equalities Impact Assessment (EqIA) of development plans was introduced in the Equality Act 2010 but was abolished in 2012. Despite this, authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions.

1.28 The Equality Act identifies nine 'protected characteristics' and seeks to protect people from discrimination based on these characteristics. It presents three main duties: to eliminate discrimination, harassment, victimisation and other conduct that is prohibited under the Act; to advance equality of opportunity and to foster good relations between persons who share relevant protected characteristics and persons who do not share it. The nine protected characteristics identified through the Act are:

- Age: Children (0-4), Younger people (aged 16-24), older people (aged 65 and over);
- Disability: Disabled people, people with physical and mental impairment;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief;
- Sex; and
- Sexual orientation.

1.29 A number of the waste planning authorities also recognise care experience and socio-economic status as protected characteristics. In fulfilling the Equality Act duty, many authorities still find it useful to produce a written record of how equality issues have been considered. In this IIA report, the potential for equality impacts on the protected characteristics (both under the Act and recognised locally) are considered

within the IIA appraisal framework (set out in **Chapter 3**). The potential equalities impacts are also summarised in a separate section within **Chapter 5**.

Habitats Regulations Assessment

1.30 The requirement to undertake Habitats Regulations Assessment (HRA) of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in July 2007 and updated in 2010 and again in 2012 and 2017 **[See reference 7]**. The Regulations translate Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) and 79/409/EEC (Birds Directive) into UK law and currently remain a legal requirement despite the UK exiting the European Union.

1.31 The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of any designated Habitats Sites (Special Areas of Conservation, Special Protection Areas and Ramsar site) present within or in proximity to a plan area, and to ascertain whether it would adversely affect the integrity of that site.

1.32 The HRA has been undertaken and reported on separately but the findings have been taken into account in the IIA where relevant.

Approach to Integrated Impact Assessment

1.33 The methodology for this IIA report is explained in **Chapter 2**, and the framework for the appraisal process is set out at the end of **Chapter 3**. In accordance with the Government's Planning Practice Guidance on SEA/SA, the IIA Report is proportionate and relevant to the WLWP, focussing on what is needed to assess likely significant effects **[See reference 8]**. It also takes account of the National Planning Policy Framework (NPPF) and the emphasis it places on achieving sustainable development.

1.34 This IIA Report follows and takes account of key legislation, policy and guidance including:

- Directive 2001/42/EC on the assessment of the effects of certain plans, and programmes on the environment i.e., the SEA Directive **[See reference** 9**]**;
- The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633) **[See reference** 10**]**, as amended by the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) **[See reference** 11**]**;
- Strategic Environmental Assessment and Sustainability Appraisal National Planning Practice Guidance **[See reference** 12**]**;
- A Practical Guide to the Strategic Environmental Assessment Directive **[See reference** 13**]**;
- Guidance on Integrating Climate Change and Biodiversity into Strategic Environmental Assessment **[See reference** 14**]**;
- Guidance on Strategic Environmental Assessment / Sustainability Appraisal and the Historic Environment **[See reference** 15**]**;
- Strategic Environmental Assessment: Improving the effectiveness and efficiency of Strategic Environmental Assessment / Sustainability Appraisal for land use plans **[See reference** 16**]**;
- Draft Guidance on Assessing Health Impacts in Strategic Environmental Assessment **[See reference** 17**]**; and
- Health Impact Assessment in spatial planning: A guide for local authority public health and planning teams **[See reference** 18**]**.

1.35 The Levelling-up and Regeneration Act 2023 (LURA 2023) **[See reference** 19**]** provides for changes to the planning system, including the replacement of the current environmental reports regime. These changes have not been brought forward through secondary legislation at the time of writing this report. Any future changes to the planning system through the LURA will be picked up at later stages of the IIA process, where it is appropriate to do so.

Where the SEA Regulations are addressed in this IIA Report

1.36 The relevant sections of the IIA Report that are considered to meet the SEA Regulations requirements are signposted below. This information will be included in the IIA Report at each stage of the IIA to show how the requirements of the SEA Regulations have been met through the IIA process.

1.37 SEA Guidance recognises that data gaps will exist but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how it will affect their assessments and determine how to improve it for use in the assessment of future plans. Where there are data gaps in the baseline these are highlighted in the text. The collection and analysis of baseline data is regarded as a continual and evolving process, given that information can change or be updated on a regular basis. Relevant baseline information will be updated during the appraisal process as and when data are published. The waste baseline information reflects the evidence prepared in support of the plan.

Preparation of an environmental report

1.38 Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated (Reg. 12). The information to be given is (Schedule 2):

- a) An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.
  - Covered in **Chapters 1** and **3** and **Appendix A** of this IIA Report.
- b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.
  - Covered in **Chapter 3** and **Appendix C** of this IIA Report.

- c) The environmental characteristics of areas likely to be significantly affected.
  - Covered in **Chapters 1** and **3** and **Appendix C** of this IIA Report.
- d) Any existing environmental problems which are relevant to the plan or programme including those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.
  - Covered in **Chapter 3** and **Appendix C** of this IIA Report.
- e) The environmental protection objectives established at international, community or national level that are relevant to the plan or programme and the way those objectives and any environmental considerations have been considered during its preparation.
  - Covered in **Chapter 3** and **Appendix A** of this IIA Report. **Chapter 3** describes the IIA Framework, which shows how the objectives have been considered.
- f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and the interrelationship between these issues. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.)
  - Covered in **Chapters 5** and **6** of this IIA Report.
- g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.
  - Covered in **Chapters 5** and **6** of this IIA Report.
- h) An outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken, including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

  - Information about how the assessment was undertaken, including the alternatives dealt with and difficulties encountered is covered in **Chapter 2** of this IIA Report.
  - An outline of the reasons for selecting the alternatives dealt with is provided in **Chapter 4** of this IIA Report.
- i) A description of measures envisaged concerning monitoring in accordance with Regulation 17.
  - Covered in **Chapter 7** of this IIA Report.
- j) A non-technical summary of the information provided under the above headings.
  - A separate non-technical summary document has been prepared to accompany this Regulation 19 IIA Report.
- The report shall include the information that may reasonably be required considering current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process, and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3)).
  - This is addressed throughout the IIA Report.

Consultation requirements

- Authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Reg. 12(5)).
  - Focused consultation on the scope and level of detail of the IIA was carried out via an IIA Scoping Report, with the Environment Agency, Historic England, and Natural England for the statutorily required 5 weeks in June-July 2025. The consultation responses and how they were addressed in the Regulation 18 IIA Report are presented for reference in **Appendix B**.

- Authorities with environmental responsibility, and the public, are required to be given an effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Regulation 13).
  - The consultation responses on the Regulation 18 WLWP and IIA and how they have been addressed in this report are presented in **Appendix B**.
  - Public consultation is being undertaken on the Regulation 19 WLWP commencing summer/autumn 2026. The Regulation 19 WLWP is accompanied by this IIA Report.
- EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14).
  - The WLWP is not expected to have significant effects on any EU Member States.

Taking the environmental report and the results of consultation into account in decision making (Reg. 16)

1.39 When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed:

- The plan or programme as adopted;
- A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed, and the results of consultations entered have been considered, and the reasons for choosing the option set out in the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures decided concerning monitoring.
  - To be addressed after the WLWP is adopted.

Monitoring

- Monitoring of the significant environmental effects of the plan's or programme's implementation (Reg 17).
  - Suggested monitoring indicators are set out in **Chapter 7** of this IIA Report.

Quality assurance

- Environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.
  - This IIA Report has been produced in line with current guidance and best practice for SEA/SA and this section has demonstrated where the requirements of the SEA Regulations have been met.

Structure of the IIA Report

1.40 This chapter describes the background to the production of the Regulation 19 WLWP and the requirement to undertake SA and the other assessment processes included in the IIA. The remainder of this IIA Report is structured into the following sections:

- **Chapter 2** describes the approach that is being taken to the IIA of the WLWP.
- **Chapter 3** describes the relationship between the WLWP and other relevant plans, policies and programmes; summarises the social, economic and environmental characteristics of the WLWP area and identifies the key sustainability issues. It also presents the IIA framework of sustainability objectives used to assess the potential effects of the emerging and updated WLWP.
- **Chapter 4** presents the alternative policy and site options considered for inclusion in the WLWP.

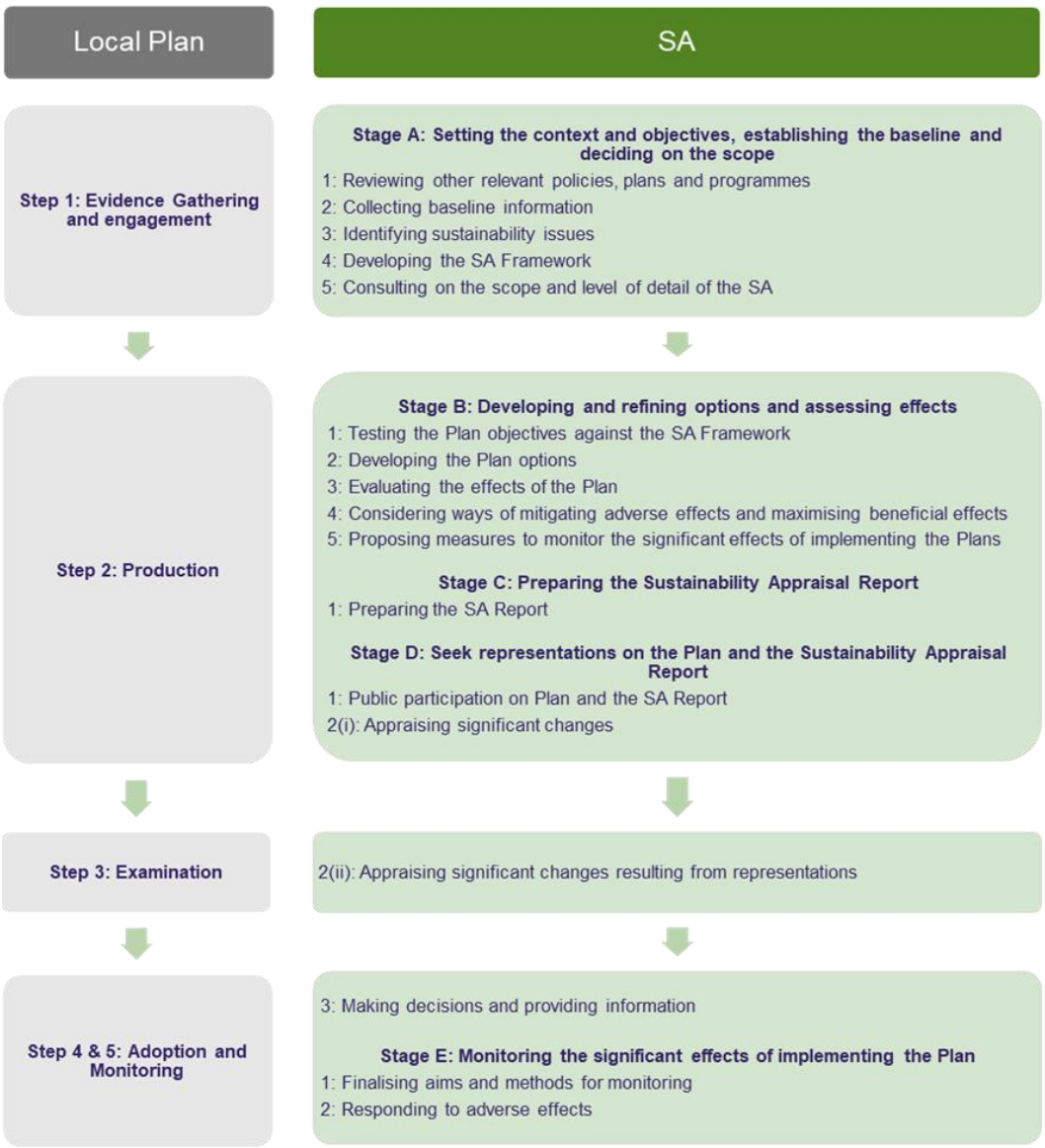
- **Chapter 5** presents the IIA findings, including the EqIA and HIA for the various elements of the Regulation 19 WLWP, including the vision, objectives and updated policies.
- **Chapter 6** describes the cumulative effects of the WLWP considered in terms of the plan as a whole, and in relation to other plans.
- **Chapter 7** summarises recommendations for monitoring the effects of the WLWP.
- **Chapter 8** sets out the key conclusions and next steps to be undertaken in the IIA of the WLWP.
- **Appendix A** presents a review of relevant plans, policies and programmes.
- **Appendix B** presents the consultation comments received in relation to the IIA work issued alongside the Regulation 18 WLWP as well as the IIA Scoping Report and explains how they have been addressed.
- **Appendix C** presents baseline sustainability information for the plan area.
- **Appendix D** presents the site assessment criteria developed for the IIA objectives that have been used to appraise the potential site options.
- **Appendix E** presents a summary of the IIA findings for the reasonable alternative policy and site options considered during preparation of the WLWP.

Chapter 2

Methodology

2.1 In addition to complying with legal requirements, the approach being taken to the IIA of the West London Waste Plan (WLWP) is based on current good practice and the guidance on SA/SEA set out in the Government's Planning Practice Guidance **[See reference** 20**]**. This calls for IIA to be carried out as an integral part of the plan-making process and **Figure 2.1** sets out the main stages of the plan-making process and shows how these correspond to the IIA process.

Figure 2.1: Corresponding stages in plan-making and SA



2.2 The sections below describe the approach that has been taken to the IIA of the WLWP to date and provide information on the subsequent stages of the process.

SA Stage A: Scoping

2.3 The Scoping stage of IIA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues and using these to inform the appraisal framework as follows.

Review other relevant policies, plans and programmes to establish policy context

2.4 The WLWP is not prepared in isolation; rather it is prepared within the context of other policies, plans and programmes. The SEA Regulations require the Environmental Report to describe the relationship of the plan with other relevant plans and programmes. It should also be consistent with environmental protection legislation and support attainment of sustainability objectives that have been established at the international, national, and regional/sub-regional levels.

2.5 The IIA Scoping Report contained a review of other policy documents relevant to the scope of the emerging WLWP and to the sustainability objectives it should seek to support. This review was updated as part of the IIA. The review is presented in **Appendix A**.

Collect baseline information to establish sustainability context

2.6 Information on existing environmental, social and economic conditions in the plan area provides the baseline against which the plan's effects can be assessed in the IIA and monitored during the plan's implementation.

2.7 Baseline information can also be combined with an understanding of drivers of change that are likely to persist regardless of the WLWP to understand the likely future sustainability conditions in the absence of the WLWP.

2.8 The SEA Regulations require the Environmental Report to describe relevant aspects of the current state of the environment and how they are likely to evolve without the plan. An understanding of this likely future, together with the assessed effects of the plan itself, additionally allows the IIA to report on cumulative effects, another requirement of the SEA Regulations.

2.9 The SEA Regulations require assessment of effects in relation to the following 'SEA topics': biodiversity, population, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage), landscape, and the inter-relationship between these. Baseline information was therefore collected in relation to the SEA topics and additional sustainability topics were also addressed, covering broader socio-economic issues such as housing, access to services, crime and safety, education and employment. This reflects the integrated approach that is being taken to the IIA and SEA processes. Baseline information for the authorities is collected and updated as part of the preparation of each iteration of the IIA and is presented in **Appendix C.**

Identify sustainability issues

2.10 The baseline information also allows the identification of existing sustainability issues, including problems, as required by the SEA Regulations.

2.11 Sustainability issues and their likely evolution without the WLWP are detailed in **Appendix C** and summarised in **Chapter 3**.

Develop the IIA framework

2.12 The relevant sustainability objectives identified by the review of other policies, plans and programmes together with the key sustainability issues facing the authorities, identified by the collection and review of baseline information in the IIA Scoping Report, informed a set of sustainability objectives (the 'IIA framework') against which the effects of the Plan have been assessed. These objectives also take into account the types of issues that are capable of being affected by the land use planning system.

2.13 Development of the IIA framework is not a requirement of the SEA Regulations but is a recognised way in which the likely sustainability effects of a plan can be transparently and consistently described, analysed and compared. The IIA framework comprises a series of sustainability objectives and supporting criteria that are used to guide the appraisal of the policies and proposals within a plan. The IIA framework that was used in this way throughout the plan-making process is presented at the end of **Chapter 3**.

Consult on the scope and level of detail of the SA

2.14 Public and stakeholder participation is an important element of the IIA and wider plan-making processes. It helps to ensure that the IIA Report is robust and has due regard for all appropriate information that will support the WLWP in making a contribution to sustainable development.

2.15 The SEA Regulations require the statutory consultation bodies (the Environment Agency, Historic England, and Natural England) to be consulted “when deciding on the scope and level of detail of the information that must be included” in the IIA Report. The scope and level of detail of the IIA is governed by the IIA framework and the statutory consultees have therefore been consulted on this when it was

developed as part of the scoping process for the IIA Report. The IIA Scoping Report was sent to the statutory consultees for consultation in June and July 2025.

2.16 Comments that were received on the IIA Scoping Report were considered and accommodated within the next iteration of the IIA (Regulation 18). A small number of amendments were made to update the review of policies, plans, and programmes in Appendix A and update small sections of the baseline information in Appendix C. The Environment Agency also suggested some additions to the IIA framework to ensure it referred to the wider benefits of green infrastructure and aquatic habitats in addition to land-based biodiversity features. Additional appraisal questions for IIA objectives 4, 7 and 10 were also added into the IIA framework. All consultation responses and how each comment was addressed is provided in **Appendix B** of this IIA report.

SA Stage B: Developing and refining options and assessing effects

2.17 The consideration of reasonable alternatives is a key focus of attention within the IIA process. Developing options (alternatives) for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the IIA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan.

2.18 In relation to the IIA report, Part 3 of the SEA Regulations 12 (2) requires that:

> "The report must identify, describe and evaluate the likely significant effects on the environment of—
>
> (a) implementing the plan or programme; and
>
> (b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme."

2.19 Schedule 2 (h) of the SEA Regulations requires that the Environmental Report includes a description of:

> "(h) an outline of the reasons for selecting the alternatives dealt with."

Developing and refining options

2.20 The SEA Regulations require that the alternative policies or spatial options considered for inclusion in a plan are 'reasonable' if they are to be subject to IIA; therefore, alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the NPPF) or site options that are unavailable or undeliverable.

2.21 Following a review of national, regional and local policies and strategies, the vision and strategic objectives were drafted for the WLWP. A set of key strategic issues to be addressed by the emerging WLWP were identified under each of the strategic objectives. A number of alternative policy approach options were identified for each key issue during the preparation of the emerging WLWP (Regulation 18).

2.22 The emerging WLWP does not allocate new waste sites because the evidence suggests that there is sufficient waste management capacity within existing waste sites to manage forecast waste arisings in West London. Therefore, site options for new waste site allocations were not considered at Regulation 18, however, options relating to whether to identify new site allocations or rely on safeguarding existing waste sites were.

2.23 Although the WLWP does not require new waste sites to be allocated, the consultation for the emerging WLWP at Regulation 18, did provide an opportunity for organisations to respond and put forward a site for a specific waste management development through a 'Call for Sites' exercise. Three sites were put forward under

the Call for Sites and upon review of these, two sites were considered in the IIA as reasonable alternatives.

2.24 Further explanation of the policy and site options identified for the WLWP and whether they were considered to be reasonable alternatives for the purpose of the IIA is provided in **Chapter 4**.

Assessing the effects of the Plan and reasonable alternatives

2.25 The reasonable alternative policy and site options have been assessed and the IIA findings are presented in **Appendix E**. The draft vision, strategic objectives and six policies in the Regulation 18 WLWP were appraised against the IIA objectives in the IIA framework and the findings are also summarised in **Appendix E**. The IIA appraisal of the vision, strategic objectives and seven policies in the Regulation 19 WLWP are presented in **Chapter 5**. The potential cumulative effects of the WLWP are described in **Chapter 6**.

Making recommendations for the Plan

2.26 The IIA and HRA team had the opportunity to comment and make recommendations on the Regulation 18 WLWP policies as they were being drafted. This resulted in the strengthening of some policies through more comprehensive mitigation requirements within Policies WLWP 2 and 4.

2.27 IIA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. There will often be an equal number of positive or negative effects identified by the IIA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan.

SA Stage C: Preparing the Sustainability Appraisal report

2.28 This IIA report describes the process that was undertaken to date in carrying out the IIA of the WLWP. It contains an appraisal of the vision and objectives for the plan, and seven policies. The focus of the appraisal was the identification of significant effects, whether positive or negative, in accordance with the SEA Regulations.

2.29 This IIA report is intended to meet all the reporting requirements of Schedule 2 of the SEA Regulations.

SA Stage D: Consultation on the Local Plan and the IIA Report

2.30 The Regulation 18 draft WLWP and accompanying IIA Report were published for consultation between 11 December 2025 and 5 February 2026. **Appendix B** lists the comments that were received on the IIA during the consultation period and describes how each comment was addressed within this updated IIA.

2.31 The seven waste planning authorities are now inviting comments on the WLWP (Regulation 19 Proposed Submission version) and this accompanying IIA Report. These documents will be published on the West London Waste Plan website for consultation during summer/autumn 2026.

SA Stage E: Monitoring implementation of the Local Plan

2.32 Recommendations for monitoring the likely significant social, environmental and economic effects of implementing the WLWP are presented in **Chapter 7** of this IIA Report.

IIA framework

2.33 The development of a set of IIA objectives (known as the IIA framework) is a recognised way in which the likely environmental and sustainability effects of a plan and reasonable alternatives can be described, analysed and compared. The IIA framework for the WLWP is presented at the end of **Chapter 3** and was developed by LUC from the analysis of national, regional and local policy objectives, baseline information, and key sustainability issues identified in the Plan area.

2.34 The IIA framework comprises a series of IIA objectives, each accompanied by a set of guide questions that are used to appraise the performance of the emerging WLWP and its reasonable alternatives against the IIA objectives. The relationship between the key sustainability issues, the IIA objectives, the SEA Topics and Equality Act 2010 protected characteristics is set out within **Chapter 3.**

Key to IIA effects symbols

2.35 The findings of the IIA are presented as colour coded symbols showing an effect for each option against each one of the IIA objectives along with a concise justification for the effect given, where appropriate. The colour coding is shown in **Table 2.1** below.

Table 2.1: IIA effects symbols

Symbol	Effect
++	Significant positive effect likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect likely
+/-	Mixed minor effects likely
++/--	Mixed significant effects likely
-	Minor negative effect likely
--/+	Mixed significant negative and minor positive effects likely
--	Significant negative effect likely
0	Negligible effect likely
?	Likely effect uncertain
N/A	Not applicable or relevant

2.36 Where a potential positive or negative effect is uncertain, a question mark was added to the relevant symbol (e.g. +? Or -?) and the symbol was colour coded as per the potential positive, negligible or negative effect (e.g. green, white, yellow, pink, etc.). Negligible effects are recorded where a policy or site allocation is considered to have no effect in contributing to achievement of the IIA objective. This is usually the case when an objective or policy is focused on a very narrow topic and would only affect two or three IIA objectives, with the rest being recorded as negligible.

2.37 The likely effects of options and policies need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. The appraisal has attempted to differentiate between the most significant effects and

other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) was used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option or policy on the IIA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, effects are relative to the scale of proposals under consideration.

2.38 Mixed effects have only been presented where directly opposing effects (i.e. positive and negative) have been identified through the appraisal (e.g. +/-, ++/-, --/+ and ++/--). For some IIA objectives, it is possible that a policy might have a minor positive effect in relation to one aspect of the policy and a significant positive effect in relation to another aspect (giving a score of +/++). However, in these instances, only the significant score is shown in the appraisal tables. Similarly, if a policy could have a minor and significant negative effect (-/--) for the same IIA objective, only the significant negative score is shown in the appraisal tables. The justification text relating to the appraisal describes where the various elements of the policy or site being appraised might have potential to result in effects of differing magnitude.

2.39 For the appraisal of potential waste site options, an additional set of criteria were developed for the appraisal questions in the IIA framework. Generally, when predicting the likely effects of developing a site option for a waste management use, it is the relative proximity of the site to various sensitive receptors, e.g. housing or schools, biodiversity sites or heritage assets that will cause the impact, either during construction or operation of the waste management facility. There are also some assumptions that can be made about the likely effects of different types of waste management, e.g. possible odour or release of biospores from open air composting, release of emissions from energy from waste facilities or the potential for vermin, noise or odour from a non-inert landfill. The site assessment criteria used in this IIA for each IIA objective are set out in **Appendix D**.

Difficulties and data limitations

2.40 The SEA Regulations, Schedule 2(8) require the Environmental Report to include:

> "…a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information."

2.41 The following information or data limitations arose in the course of the assessment work carried out to date and these are outlined below:

- Many effects of new waste development are dependent on the exact location, layout and design of development, and it may be possible to mitigate some of the effects of site options highlighted in this IIA. However, some of these effects will be very dependent on the layout, design and subsequent operation of the facility, which cannot be known at this stage in the planning process. This uncertainty is set out in the site assessment criteria in **Appendix D**, and where relevant in the appraisal of the policies in **Chapter 5**. For the site options, the IIA focuses on identifying potential significant effects of the options considered, without making assumptions about detailed design or mitigation measures that might be implemented. It should be noted, that best professional judgement has been used to confirm the site boundaries for site assessment, based on the information submitted to the Call for Sites exercise and based on known planning consent boundaries.
- The number of strategies, plans, programmes, policy documents, advice and guidance produced by a range of statutory and non-statutory bodies means that it has not been possible within the resources available to consider every potentially relevant document in detail (see **Chapter 3** and **Appendix A**). Strategies, plans and programmes will be newly prepared or updated throughout the preparation of the emerging WLWP and each iteration of the IIA will take account of those changes, where it is appropriate.

- All waste planners in England rely on the Environment Agency Waste Data Interrogator and it is considered the best available source of data available for waste planning purposes. However, it is not possible to obtain entirely accurate estimates of waste arisings, or imports and exports due to limitations of the available data and methods of collecting it. The WLWP evidence base acknowledges that not all waste arising in, or imported to, or exported from, West London may be represented in the data; and not all data may be accurately attributed. A particular issue is the tonnage of waste not attributed down to WPA level in the Waste Data Interrogator. This is due to reporting practices of some site operators. Additional data sources have been used to help overcome these issues in the Regulation 19 WLWP where available. As part of the Regulation 18 consultation process, updated information on waste data was provided by some of the site operators. The IIA has followed the lead of the plan, and has not made any additional assumptions in the movement of waste across the plan area, or further within or outside of London.

Chapter 3

Sustainability context

Introduction

Policy context

3.1 Schedule 2 of the SEA Regulations requires the SA Report to describe:

> (e) "the environmental protection objectives established at International, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation"

3.2 To establish a clear scope for the IIA it is necessary to review and develop an understanding of the environmental, social and economic policy objectives that the updated West London Waste Plan (WLWP) should seek to conform with and help to deliver against. This chapter summarises the international and national policy objectives that should be taken into consideration during preparation of the plan. These objectives have been considered when drafting the IIA Framework at the end of this chapter**.**

3.3 There is an extensive range of policy documents that are of potential relevance to the Local Plan preparation and IIA process. A pragmatic and proportionate approach was taken to the review of the policy context, seeking to identify key sustainability (i.e. environmental, social or economic) objectives that have the potential to be influenced by the updated WLWP. A summary of the relevant objectives of key policy documents is provided in this chapter with a wider and more detailed review provided in **Appendix A**.

Implications of 'Brexit'

3.4 At the end of January 2020 the UK left the EU. Principally, the UK's environmental law was derived from EU law. As a result of Brexit, the European Union (Withdrawal) Act 2018 converted existing EU law which applied directly in the UK's legal system (such as EU Regulations and EU Decisions) into UK law and preserved laws made in the UK to implement EU obligations (e.g. the laws which implement EU Directive). As set out in the Explanatory Memorandum accompanying the Brexit amendments to the SEA Regulations **[See reference** 21**]**, the purpose of the Brexit amendments is to ensure that the law functions correctly after the UK has left the EU.

3.5 The 2023 Levelling-up and Regeneration Act **[See reference** 22**]** sets out the Government's proposals for reforming the planning system. Among other things, the Act sets the stage for the reform of the current system for SEA by providing instead for 'Environmental Outcomes Reports' designed to streamline the process for identifying and assessing the environmental impact of plans and projects. The specific requirements will be set out in forthcoming legislation, along with information about transition arrangements but for now, the requirement for SEA remains, as set out in existing legislation. Any changes to the legal framework for carrying out SA/SEA will be addressed if necessary as the updated WLWP is prepared.

International plans, policies and programmes

3.6 Relevant international plans and policy (including those at the EU level) are transposed into national plans, policy and legislation and these have been considered.

3.7 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') have been transposed into UK Regulations. They are particularly significant given that Strategic Environmental Assessment (SEA) and

Habitats Regulations Assessment (HRA) are to be undertaken in relation to the WLWP. These assessment processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on nature conservation sites of international importance) are identified and can be mitigated.

3.8 Directive 2008/98/EC (Waste Framework Directive) is also of particular relevance. It has also been transposed into UK law and aims to protect the environment and human health by preventing or reducing the adverse impacts of the generation and management of waste and by reducing overall impacts of resource use and improving the efficiency of such use.

3.9 There are a wide range of other EU Directives relating to issues such as water and air quality, most of which have been transposed into UK law through national-level policy.

3.10 Furthermore, the 2030 Agenda for Sustainable Development (2015) **[See reference** 23**]**. This initiative, adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SDG 6: Clean Water and Sanitation
- SDG 08: Decent Work and Economic Growth
- SDG 09: Industry, Innovation and Infrastructure
- SDG 11: Sustainable Cities and Communities
- SDG 12: Responsible Consumption and Production
- SDG 13: Climate Action
- SDG 14: Life Below Water
- SDG 15: Life on Land

Key national plans and programmes

3.11 The National Planning Policy Framework (NPPF) **[See reference** 24**]** is the overarching planning framework which provides national planning policy and principles for the planning system in England. The WLWP must be consistent with the requirements of the NPPF which sets out information about the purposes of local plan-making. It states:

3.12 "Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings".

3.13 The NPPF does not contain specific waste policies. The detailed waste planning policies are contained in the National Planning Policy for Waste (2014) **[See reference** 25**]**. The policies state that when preparing Local Plans, waste planning authorities should take account of a number of criteria including:

- Driving waste management up the waste hierarchy;
- Identifying the need for waste management facilities
- Working jointly and collaboratively with other planning authorities to provide a network of facilities to deliver sustainable waste management; and,
- Identifying suitable sites and areas for waste management facilities in line with the proximity principle, giving priority to the re-use of previously developed land.

3.14 The NPPF is supported by Planning Practice Guidance which includes guidance on Waste (2015) **[See reference** 26**]**. The PPG provides guidance on implementing the waste hierarchy, the preparation of local plans and sustainability appraisals for waste local plans, and determining planning applications for waste facilities. According to the guidance on flood risk and coastal change, waste treatment facilities are classified as less vulnerable and are suitable in all flood zones, excluding 3b (the functional floodplain). Landfills and sites used for waste management facilities for hazardous waste are considered to be more vulnerable and are suitable only in Flood Zones 1 and 2, and potentially 3a.

3.15 Also of particular relevance to the WLWP is the National Waste Management Plan for England (DEFRA, 2021) which provides an analysis of the current waste management situation in England and supports the implementation of the objectives and provisions of the Waste (England and Wales) Regulations 2011.

3.16 Table 3.1 lists the national plans and programmes that are of greatest relevance to the WLWP. Further national plans and programmes are included in **Appendix A**. It should be noted that some of the documents will be updated in the timeline of preparing the IIA for the WLWP. This list is updated at each stage of the IIA, where appropriate.

Table 3.1: Key national plans and programmes of relevance for the emerging WLWP

National Legislation
HM Government (1979) Ancient Monuments and Archaeological Areas Act 1979
HM Government (1981) The Wildlife and Countryside Act 1981
HM Government (1990) Planning (Listed Building and Conservation Areas) Act
HM Government (1990) Environmental Protection Act 1990
HM Government (2000) Countryside and Rights of Way Act 2000
HM Government (2003) Sustainable Energy Act
HM Government (2006) The Natural Environment and Rural Communities (NERC) Act
HM Government (2016) Energy Act 2016
HM Government (2008) The Climate Change Act 2008 (as amended)
HM Government (2008) The Planning Act 2008
HM Government (2021) The Environment Act 2021
HM Government (2010) Flood and Water Management Act 2010
HM Government (2014) Water Act 2014

National Regulations
HM Government (2015) Water Framework Directive (England and Wales) (amendment) Regulations 2015
HM Government (2016) Environmental Permitting (England and Wales) Regulations 2016
HM Government (2010) The Conservation of Habitats and Species Regulations 2010
HM Government (2002) The Landfill (England and Wales) Regulations 2002
HM Government (1994) Urban Waste Water Treatment (England and Wales) Regulations 1994
HM Government (2005) The Hazardous Waste (England and Wales) Regulations 2005
HM Government (2011) The Animal By-Products (Enforcement) (England) Regulations 2011
HM Government (2005) Waste Management (England and Wales) Regulations 2005
HM Government (2012) Waste (England and Wales) (Amendment) Regulations 2012
HM Government (2002) Air Quality (England) (Amendment) Regulations 2002
HM Government Circular 1/2003: Safeguarding, Aerodromes, Technical Sites and Military Explosive Storage Areas
HM Government (2017) The Conservation of Habitats and Species Regulations 2017 (as amended)
HM Government (2020) The Waste (Circular Economy) (Amendment) Regulations 2020
National Policies, Plans and Strategies
DCMS (2013) Scheduled Monuments & Nationally Important but Non-Scheduled Monuments Policy Statement
HM Government (2019) Clean Air Strategy 2019 Policy Paper
DEFRA (2011) Safeguarding our Soils: A Strategy for England Policy Paper

Natural England (2021) Guide to assessing development proposals on agricultural land – National Guidance
DLHC (2022) Flood risk and coastal change guidance
Environment Agency (2022) National Flood and Coastal Erosion Risk Management Strategy for England
Environment Agency (2022) Flood risk assessments: climate change allowances – National Guidance
Environment Agency (2025) National Framework for Water Resources
HM Government (2020) UK Marine Policy Statement
HM Government (2021) South East Inshore Marine Plan
Environment Agency (2017) Groundwater protection guides
DfT (2021) Transitioning to zero emission cars and vans: 2035 delivery plan – National Guidance
DEFRA (2013) Hazardous Waste National Policy Statement
DECC (2011) National Policy Statement for Renewable Energy Infrastructure (EN-3)
DECC (2012) Strategy for the management of solid low level radioactive waste from the non-nuclear industry
DECC (2009) The UK Renewable Energy Strategy
HM Government (2021) Net Zero Strategy: Build Back Greener
BEIS (2021) Industrial Decarbonisation Strategy
DEFRA (2020) Rural proofing in England 2020 Policy Paper
DLUHC (2021) National Design Guide
MHCLG (2024) National Planning Policy Framework
DCLG (2014) National Planning Policy for Waste
MHCLG (2015) National Planning Practice Guidance for Waste (living document)
DEFRA (2021) National Waste Management Plan for England

DEFRA (2013) Waste prevention programme for England: Prevention is better than cure – The role of waste prevention in moving to a more resource efficient economy Policy Paper
DEFRA (2018) Our Waste, Our Resources: A strategy for England Policy Paper
BEIS (2022) British Energy Security Strategy Policy Paper
DfT (2022) Air quality: clean air zone framework for England Policy Paper
HM Government (2017) Litter Strategy for England Policy Paper
DfT (2022) Future of freight plan Policy Paper
DEFRA (2022) Landscapes Review (National Parks and AONBs): government response Policy Paper
DEFRA (2020) Agricultural Transition Plan 2021 to 2024 Policy Paper
DCLG (2021) National Planning Policy Framework
DCLG (2015) Planning Practice Guidance on Waste
DEFRA (2012) National Policy Statement for Waste Water
DEFRA (2013) National Policy Statement for Hazardous Waste
HM Government (2013) Waste prevention programme for England: Prevention is better than cure – The role of waste prevention in moving to a more resource efficient economy
British Energy Security Strategy (2022)
DEFRA (GP3): Underground, Under threat – Groundwater Protection: Policy and Practice
MHCLG (2019) Clean Air Strategy
DECC (2014) Community Energy Strategy
DEFRA (2023) Biodiversity Net Gain
Environment Agency (2022) Thames River Basin District River Basin Management Plan: updated 2022
DEFRA (2018) 25 Year Environment Plan

3.17 The WLWP is not being prepared in isolation but is influenced by, and influences, other polices, plans and programmes. The WLWP needs to be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and plans. It must also conform to environmental protection legislation and the sustainability objectives established at the international, national and local levels.

3.18 Schedule 2 of the SEA Regulations requires:

> (1) "an outline of the…relationship with other relevant plans or programmes"; and
>
> (5) "the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation"

3.19 In order to establish a clear scope for the IIA it is necessary to review and develop an understanding of the environmental, social and economic objectives contained within international and national plans and programmes that are of relevance to the WLWP. The review is not exhaustive, and an exhaustive approach would not be proportionate or be useful in understanding the policy environment that the WLWP must be prepared within. Instead, the review focuses on a limited number of key policy documents that are of particular importance of setting the parameters of what the WLWP should and should not do. It should be noted that the policy context within which the WLWP and its IIA are being prepared is inherently uncertain given the following key factors:

3.20 UK economy – Although 4.5% higher than the pre-pandemic level of Q4 2019, GDP growth has been fairly subdued over the past year, growing by 0.3% in Q2 2025, compared with Q1 2025 **[See reference** 27**]**. There is currently little indication that UK GDP growth rates will noticeably accelerate in the near future. The Organisation for Economic Co-operation and Development (OECD) forecasts UK GDP to only grow from 1.3% to 1.4% in 2025, while leaving 2026 unchanged at

1.0%. The International Monetary Fund (IMF) slightly raised its forecast for UK GDP growth in 2025 from 1.1% to 1.2%, while leaving 2026 unchanged at 1.4%.

3.21 'Brexit' – Following the UK's departure from the European Union on 31st January 2020, it entered a transition period which ended on 31st December 2020. From 1st January 2021, directly applicable EU law no longer applies to the UK and the UK is free to repeal EU law that has been transposed into UK law. Where EU law has been transposed into UK law and not repealed, the relevant EU and UK legislation is still referred to in this report.

3.22 Planning Reforms – The Levelling Up and Regeneration Act introduced several reforms to the planning system, for which secondary legislation is still being taken through the parliamentary process. The Act introduced a new Infrastructure Levy and a new approach to environmental assessments such as SA/SEA (called Environmental Outcome Reporting). The Planning & Infrastructure Act (December 2025), has brought in proposals to speed up planning decisions, reintroduce a strategic level of planning through preparation of Spatial Development Strategies that cover sub-regional groupings of local authorities and to reduce the burden of environmental assessment processes through the production of 'Environmental Delivery Plans' (EDPs), determining standardised levels of environmental mitigation needed for certain types and scales of development in a specific area. The Labour Government also rapidly brought in some significant changes to national policy, in particular in relation to development within the Green Belt and mandatory housing targets.

Regional, sub-regional and local plans and programmes

3.23 It is not a requirement of the SEA Regulations to describe the relevance of policy objectives established at sub-national scale for the WLWP. However, since there is a regional tier of government in Greater London they provide further context for the WLWP. Those considered of most relevance (e.g. relating to the economy, transport, climate change and green infrastructure) are listed below.

Table 3.2: Key GLA policies, strategies and guidance

Key Greater London Authority (GLA) policies, strategies and guidance
The London Plan (2021)
Climate Action Strategy 2020-2027 (2020)
London Environment Strategy (2022)
Local Nature Recovery Strategy (in progress)
Accessible London SPG (2014)
Optimising Site Capacity: A Design - Led Approach LPG (2023)
Characterisation and Growth Strategy (2023)
Air quality positive LPG (2023)
Air quality neutral LPG (2023)
Be Seen energy monitoring LPG (2021)
Circular economy statements LPG (2022)
Energy Planning guidance (2022)
The control of dust and emissions in construction SPG (2014)
Whole life carbon LPG (2022)
Sustainable Transport, Walking and Cycling (2022)
Urban Green Factor LPG (2023)
London Sustainable Drainage Action Plan (2015)
Thames Estuary 2100 (TE2100) (2023)

3.24 There are also a wide range of plans and programmes at the local authority scale. While such local plans do not set policy objectives that the WLWP must follow, the WLWP may nevertheless need to take into account development provided for by those local plans. This section therefore also lists local plan documents considered to be of the greatest potential relevance to the WLWP. The table includes plans

adopted or that have reached Regulation 19 stage at the date this document was published. The table includes documents relating to the Old Oak and Royal Park Development Corporation. **Appendix C** setting out the baseline of the WLWP area, draws from these local plans, programmes and policies to highlight future trends relevant to waste management in West London, such as the scale and distribution of housing and employment growth.

Table 3.3: Key Local plans, programmes and policies

Key Local plans, programmes and policies
West London wide
West London Local Area Energy Plan – Phase 1 (2023)
West London Strategic Flood Risk Assessment (2018)
Strategic Environmental Assessment of the WLWP (2015)
The adopted waste plan - West London Waste Plan (2015)
West London Waste Authority Household Reuse and Recycling Centre Report (2024)
West London Waste Authority Circular Economy and Net Zero Carbon update (2021)
Treating Waste as a valuable resource – West London Waste Annual Report (2021)
New Joint Municipal Waste Management Strategy Report 2020–2035 (2020)
West London Waste Authority Business Plan 2020–2035 (2020)
London Borough of Brent
Brent Local Plan 2019-2041 (2022)
Local Development Scheme (2025)
Brent Authority Monitoring Report 20121/22 & 2022/23 (2024)
Air Quality Action Plan (2023)

Key Local plans, programmes and policies
Sustainable Environment and Development SPD (2023)
Air quality monitoring and reports (2019 – 2023)
Neasden Stations Growth Area and Supplementary Planning Document (2022)
London Borough of Brent Climate Resilience and Adaptation Plan (2024)
Locally listed buildings (2020)
Strategic Flood Risk Assessment Level 2 (2020)
Strategic Flood Risk Assessment Level 2 Appendix B (site assessments) (2020)
Historic Environment Place-making Strategy (2019)
Declared Climate Emergency (2019)
Brent Infrastructure Delivery Plan (2019)
Brent Design Guide Supplementary Planning Document (2018)
Waste and Recycling Storage and Collection Guidance for Residential Properties (2013)
London Borough of Ealing
Ealing's Draft Local Plan (2024)
West London Employment Land Review (2022)
Local Development Scheme (2023)
Green Belt and Metropolitan Open Land (MOL) Review Stage 2 (2024)
Sites for Importance Nature Conservation (2024)
Strategic Flood Risk Assessment – Level 2 (2024)
Ealing Infrastructure Delivery Plan Part One: Infrastructure Baseline Report (2024)
Ealing Infrastructure Delivery Plan Part Two: Infrastructure Delivery Schedule (2024)
Delivering Net Zero (2023)
Generic Management Plan for Conservation Areas (2023)

Key Local plans, programmes and policies
Health and Wellbeing Strategy 2023-2028 (2023)
Green Belt and Metropolitan Open Land (MOL) Review Stage 1 (2022)
Climate and Ecology Emergency Strategy (2021)
Ealing's Authority Monitoring Report 2018/19 (2021)
Ealing Council Air quality strategy 2022–2030 (2019)
Ealing Council Transport Strategy 2019-2022 (2018)
Ealing Council Waste management guidelines for architects and developers (2018)
Development Management DPD (2013)
Development Sites DPD (2013)
Development Strategy 2026 (2012)
London Borough of Harrow
Harrow Core Strategy February 2012
Harrow Development Management Policies – July 2013
Harrow Site Allocations – July 2013
New Harrow Local Plan (2021-2024) Proposed Submission Version November 2024
Harrow Biodiversity Net Gain Working Paper – November 2024
Harrow Infrastructure Delivery Plan (2024)
Harrow Views Management Guidance (2024)
New Harrow Local Plan Strategic Flood Risk Assessment – Level 2 (2024)
West London Employment Land Review (2022)
Delivering Net Zero Carbon Report (2023)
Harrow Long term Transport Strategy – Consultation Draft (2023)
Harrow Tall Buildings SPD (2023)

Key Local plans, programmes and policies
Living Harrow: The London Borough of Harrow's Climate and Nature Strategy 2023-2030 (2023)
Local Development Scheme (2023)
Edgeware Growth Area SPD (2021)
Harrow Local Plan Authority's Monitoring Report (2021)
Harrow Biodiversity Action Plan 2015–2020 (2015)
London Borough of Hillingdon
Local Development Scheme (2025)
Hillingdon Local Plan Part 1: Strategic Policies Document (2012)
Hillingdon Local Plan Part 2: Site Allocations and Designations (2020)
Hillingdon Local Plan Part 2: Development Management Policies (2020)
London Borough of Hillingdon Climate Emergency Action Plan (2020)
London Borough of Hillingdon Our Climate Change Declaration 2030 (2020)
Authority Monitoring Report (2019)
Hillingdon Third Local Implementation Plan 2019–2041 (2019)
Development Infrastructure Study (DIFS) (2017)
Accessible Hillingdon Supplementary Planning Document (2017)
London Borough of Hillingdon Strategic Infrastructure Plan (SIP) (2017)
Planning Obligations Supplementary Planning Document (2014)
London Borough of Hounslow
Hounslow Transport Strategy (2025)
Local Plan Volumes 1 and 2 (2015)
Emerging (proposed submission version) Hounslow Local Plan 2020-2041 (2024)
Climate Change Mitigation and Adaptation SPD (2025)

Key Local plans, programmes and policies
Character, Sustainability and Design Codes SPD (2024)
Draft Infrastructure Delivery Plan (2024)
Hounslow Characterisation & Growth Study (2024)
Hounslow Local Development Scheme (2025)
Nature Recovery Action Plan (NRAP) 2023–2028 (2023)
Authority Monitoring Report (2022)
Recycling and Refuse Guidance (2022)
Climate Emergency Action Plan (2020)
Planning obligations and CIL SPD (2015)
Air Quality SPD (2008)
London Borough of Richmond upon Thames
The new Richmond Local Plan 2024-2039 (adopted October 2025)
Infrastructure Delivery Plan Addendum (2024)
Local Development Scheme (2025)
Local Plan Infrastructure Delivery Plan (2023)
Affordable Housing Supplementary Planning Document (2026)
Planning Obligations Supplementary Planning Document (2026)
Sustainable Construction Checklist Supplementary Planning Document (2026)
The Transport Strategy 2040 (2026)
Richmond upon Thames Reduction and Recycling Plan (2025)
Waste Sites Monitoring Report for 2022 (2024)
Net Zero Carbon Study (2023)
Employment Land and Premises Needs Assessment (2021)
Strategic Flood Risk Assessment – Level 1 Update (2021)

Key Local plans, programmes and policies
Air Quality SPD (2020)
Sustainable Construction Checklist Guidance Document (2020)
Planning Obligations SPD (2020)
Transport SPD (2020)
Climate Emergency and Nature Strategy (2025)
What are we doing to tackle climate change? (2019)
Development Control for Noise Generating and Noise Sensitive Development (2018)
Richmond Preliminary Flood Risk Assessment (2011)
Old Oak and Royal Park Development Corporation
OPDC Local Plan 2018-2038 (2022)
Policies Map (2022)
Authority Monitoring Report (2024-2025)
Integrated Impact Assessment (2021)
Local Development Scheme (2025)
Old Oak West SPD part 1 (2024)
Old Oak West SPD part 2 (2024)
Public Realm and Green Infrastructure SPD (2024)
OPDC Biodiversity and Urban Greening Strategy (undated)
Industrial SPD (2023)
Waste Management in High Density Development SPD (2022)
Industrial Land Review (2015) and Addendum (2021)
Infrastructure Delivery Plan (2021)
OPDC Landscape Strategy (2020)
Integrated Water Management Strategy (2018)

Key Local plans, programmes and policies
Old Oak North Development Framework Principles (2018)
Park Royal Development Framework Principles (2018)
Park Royal Transport Strategy (2018)
Waste Apportionment Study (2018)
Waste in Tall Buildings Study (2018)
Waste Management Strategy (2018)
Waste Technical Paper (2018)

Key sustainability issues

3.25 Key sustainability issues for the emerging WLWP were identified through the preparation of the IIA Scoping Report in June 2025. The key issues identified through the analysis of the baseline, policy context and consultations on the Scoping Report are set out below.

3.26 It is also a requirement of the SEA Regulations that consideration is given to the likely evolution of the environment in the plan area (in this case the WLWP plan area) if the new Local Plan was not to be implemented. This analysis is also presented in relation to each of the key sustainability issues below.

3.27 The analysis below shows that, in general, the current trends in relation to the various social, economic and environmental issues affecting West London would be more likely to continue without the implementation of the WLWP. The effectiveness of the WLWP will be focused on where waste development comes forward and may have a limited effect compared to wider local plans and other strategies.

Waste

3.28 The WLWP evidence indicates that there is likely to be sufficient capacity at existing waste management sites in West London to deal with waste arisings as required through national policy and the London Plan (2021), and therefore, there should not be a need to allocate additional sites for the development of new waste facilities in the plan. As with the adopted WLWP, there may be opportunities for redevelopment of facilities at existing sites to increase capacity, and in the future it may also be the case that existing sites could make better use of rail or water transport. Without the WLWP, these opportunities could be missed.

Climate change adaptation and mitigation

3.29 There is a need to significantly reduce greenhouse gas emissions to help meet international and national greenhouse gas reduction targets. The WLWP may provide opportunities to help achieve this through:

- Encouraging energy efficiency measures in the construction or redevelopment of any buildings associated with waste management facilities.
- Reducing carbon emissions from freight use by supporting the use of low or zero emission transport modes for waste collection, as discussed below in the section covering transport.
- Promoting green infrastructure within any redevelopment of waste sites.

3.30 The effects of climate change in the WLWP area are likely to result in extreme weather events becoming more common and more intense. Flood risk is of particular significance in this regard, alongside heatwaves and drought. Fluvial and surface water flooding poses the most significant risk to the plan area, particularly in areas in close proximity to the River Thames. The WLWP provides an opportunity to help adapt to the unavoidable effects of climate change by:

- Encouraging flood and heat resilient buildings in any redevelopment of waste sites.

- Promoting on-site biodiversity net-gain, sustainable drainage systems, as well as links to green infrastructure to deliver flood retention, shading/ cooling, air quality improvements and safe havens for vulnerable species.

Population, health and wellbeing

3.31 Across the WLWP authorities, population is forecast to increase, with younger (0 to 15) and older (over 65) protected characteristic groups seeing the largest increase. In the absence of any significant reduction in per capita resource consumption, the consequence of population growth will be an increase in the amount of waste being generated. The WLWP will provide opportunities to ensure that the existing network of waste management facilities can keep pace with demand for waste management services.

3.32 Associated with the growing population, the need for new houses to be delivered will continue, along with the challenges of under delivery of housing targets. Competition for land to develop housing can impact on the ability to deliver waste facilities, hence the importance of the WLWP for safeguarding existing facilities and enabling modernisation and expansion where appropriate. This should also help to contribute to reducing illegal fly-tipping, which is highest in Hounslow and Brent within the plan area. However, the role of the WLWP is limited compared to other initiatives such as the WLWP authorities' ability to fine those caught fly-tipping, and the Environment Agency's fight against waste crime **[See reference** 28**]**.

3.33 Levels of deprivation and socio-economic status as well as percentages of different population groups with the nine protected characteristics listed in the Equalities Act plus people with experience of care are influenced by many variables and are unlikely to change with or without the WLWP. However, there can be challenges with increasing participation in household waste recycling schemes where there are large proportions of people with limited English within communities. The GLA and each of the authorities have strategies to address inequalities but there are uncertainties if current trends will continue over time.

Economy

3.34 Beneficial economic characteristics have not been equally shared across the communities within the seven WLWP authorities. The consequence for this has been levels of local inequality, with some areas in Brent, and Hillingdon falling within the 10% more deprived Lower Super Output Areas in England. It is also reflected in Hillingdon and Brent having a higher unemployment rate than the London average.

3.35 The WLWP could contribute in a small way towards improving the diversity and quality of local employment opportunities available and potentially investment in training in more deprived urban localities, through encouraging protection, modernisation and possible expansion of existing waste facilities.

Transport

3.36 Adverse traffic conditions on key highway routes within the WLWP area can have knock-on effects on local roads, leading to localised gridlock on occasion and impacting negatively on economic productivity. In addition, with planned developments and increased housing and job provision, more pressure may be placed on the road networks.

3.37 Although the traffic movements associated with waste development may be smaller than other activities, without the WLWP it is anticipated that traffic congestion and air and noise pollution from transport associated with waste developments could continue to increase. The implications of air pollution for human health and the natural environment are described in subsequent sections.

3.38 The WLWP provides an opportunity to reduce the demand on the transport network from waste development and to address potential adverse effects of travel by:

- Supporting and prioritising sustainable travel choices through workplace travel plans; and

- Supporting the uptake of electric vehicles through the provision of electric vehicle charging infrastructure at waste sites.

Historic Environment

3.39 There are many designated and undesignated heritage assets and areas of historical and cultural interest in the WLWP area that could be adversely affected by climate change and poorly located or designed development. While several of the historic assets in the plan area, for example listed buildings and Scheduled Monuments, will continue to be protected by statutory designations, without the WLWP it is possible that these, and undesignated assets, will be adversely affected by inappropriate waste development. The WLWP provides an opportunity to protect these assets (including their settings) from inappropriate waste development, through criteria in its policies.

3.40 Although there is a high level of protection afforded historic sites within the NPPF and NPPW, more of an emphasis could be placed within the WLWP on requiring any waste redevelopments to be designed and built so as to minimise adverse effects on the county's historic environment above and below ground.

Landscape and townscape

3.41 West London’s varied urban and more rural landscapes are vulnerable to adverse effects from urban intensification, increasing recreational pressures and seasonal climate change. The WLWP provides an opportunity to help to protect and enhance such areas by ensuring the design of any redevelopment waste facilities is sympathetic to the surrounding area.

Biodiversity and Geodiversity

3.42 The WLWP area contains many areas of high ecological value ranging from nationally designated Sites of Special Scientific Interest (SSSI), Sites of Metropolitan Nature Conservation Importance and Sites of Importance for Nature Conservation (SNICs) among local green spaces and networks that provide ecological connectivity and greater biodiversity, and there is proximity to sites of national importance.

3.43 There is a need for continued preservation and long-term management of these areas within the plan area, as well as consideration of potential effects on sites outside the plan area boundary. The Brent Reservoir (Welsh Harp) SSSI, while in favourable condition, faces challenges related to water pollution and habitat degradation. SINCs across the boroughs require effective management to maintain quality and prevent degradation from traffic pollution and recreational activities. Without proactive conservation efforts, these sites could lose their ecological value, limiting the contribution they make to biodiversity, landscapes and the natural environment. Biodiversity harm can occur outside of protected areas, and local wildlife corridors should also be protected, appropriately within the hierarchy of types of designations.

3.44 Without the WLWP, important habitats and biodiversity sites will continue to receive protection from respective policies in the London Plan. However, the WLWP presents an opportunity through its policies to address the sensitivities of the sites and biodiversity networks in any new or redeveloped waste management site.

Air, land and water quality

3.45 Without the WLWP, it is possible that waste development could result in the unnecessary sterilisation of mineral and soil resources thereby preventing their use for future generations, if any new proposals for waste facilities came forward. In the absence of the WLWP, the NPPF would apply, which also supports the reuse of brownfield land.

3.46 Without the WLWP, it is possible that unplanned development for waste could be in areas that where water bodies are protected sites and sensitive to changes in water quality that might be associated with accidental spills and run-off from waste facilities. However, existing safeguards, such as the Water Framework Regulations, would help to reduce the potential for this to occur. The WLWP provides an opportunity to ensure that waste development is designed to consider the sensitivity of the water environment and water-dependent protected sites, to incorporate sustainable drainage systems (SuDS), and to promote water efficiency and grey water recycling.

3.47 Air pollution associated with parts of London's road network has exceeded statutory NO_2 levels and needs active monitoring and management. There is also an Air Quality Management Area (AQMA) associated with Heathrow Airport due to the high levels of NO_2 in the area **[See reference 29]**. In the absence of the WLWP, the policies in the NPPF and the Clean Air Strategy **[See reference 30]** would apply which support measures to improve air quality through traffic and travel management; to develop and enhance green infrastructure; and to direct any unplanned waste development to sustainable locations which limits the need to travel and offer a choice of transport modes. In addition, the WLWP area falls within the Mayor's ULEZ and LEZ designations, which help to reduce emissions, along with the waste planning authorities' various Air Quality SPDs, Action Plans and Strategies.

3.48 However, there is a risk that local air quality could be worsened by new waste development, particularly through emissions from conventional fossil-fuel based transport of waste. The WLWP could support a spatial strategy that could seek to use more sustainable alternatives to emission-generating fossil-fuel based road transport of waste. This could include switching waste transport to more sustainable modes or to low and zero carbon road-based transport.

The IIA framework

3.49 As described in the Methodology chapter, the relevant objectives established via the review of plans, policies, and programmes and the key sustainability issues identified by the baseline review informed development of a framework of

sustainability objectives, the IIA framework, against which the plan was assessed. For each of the sustainability objectives a number of appraisal questions are included to act as prompts when considering the potential effects of the WLWP in relation to that objective. It should be noted that appraisal questions are not exhaustive and not all appraisal questions will be relevant to each element of the plan that is appraised. The IIA framework is presented below.

3.50 A small number of changes were made to some of the appraisal questions in the IIA framework since it was presented in the Scoping Report, these changes were in response to comments received during the Scoping consultation, as set out in **Appendix B**.

IIA objective 1: Minimise the WLWP's contribution to climate change and promote climate resilient infrastructure

Appraisal questions:

- Will it [the WLWP] promote energy efficiency by encouraging the use of energy efficient buildings and plant, and the use of appropriate renewable or low carbon energy sources on waste sites?
- Will it reduce the WLWP's contribution to climate change by reducing greenhouse gas emissions from waste management activities?

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics covered: Climatic Factors; Air; Water; Material assets; Population; Human health.
- Equalities Impact Assessment: all Equality Act 2010 and locally protected characteristics.

- Health Impact Assessment: Activities that generate greenhouse gas emissions often generate other pollutants that adversely affect health and wellbeing.

IIA objective 2: Move treatment of waste up the Waste Hierarchy

Appraisal questions:

- Will it promote the re-use, recycling and recovery of waste in accordance with the waste hierarchy?
- Will it contribute to minimising disposal of all forms of waste, across the WLWP area and across the wider London area?
- Will it contribute to the aim in the London Plan of a zero waste city by 2050?
- Will it promote a circular low carbon economy within the WLWP area, and within London?
- Will it support community engagement and education to empower local communities to take action to reduce waste?

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics covered: Population; Human health; Material assets.
- Equalities Impact Assessment: all Equality Act 2010 and locally protected characteristics.
- Health Impact Assessment: Promoting the sustainable treatment of waste provides mental health benefits of security and physical health benefits of having a healthy living environment.

IIA objective 3: Support, maintain and enhance the development of an inclusive economy

Appraisal questions:

- Will it generate employment opportunities in the waste and resource sector for local people, especially within areas of deprivation, providing opportunities to improve local skills?
- Will it minimise harm to the existing local economy, locating waste uses away from existing sensitive receptors?

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics covered: Population and human health; Material assets.
- Equalities Impact Assessment: all Equality Act 2010 and locally protected characteristics.
- Health Impact Assessment: Security of employment is important for mental wellbeing.

IIA objective 4: Protect and improve people's health

Appraisal questions:

- Will it avoid or minimise adverse effects on human health and safety, including disproportionate impacts on communities, including those with protected characteristics, mental health vulnerabilities, and those in more deprived areas?

- Will it provide opportunities to improve health and amenity through delivery of green infrastructure, enhanced public rights of way and improved access to recreation as part of the restoration of sites, or provision of biodiversity net-gain in any redeveloped sites?
- Will it avoid or minimise adverse effects on the quality and extent of existing recreational assets?
- Will it reduce the incidence of crime associated with waste (e.g. fly-tipping and illegal dumping of large amounts of waste) by ensuring a sustainable network of waste facilities across the WLWP area, and London?
- Will it promote public access and engagement with green and blue spaces?
- Will it incorporate Nature Based Solutions to deliver multiple benefits to people and nature at the same time?

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics covered: Population; Human Health.
- Equalities Impact Assessment: all Equality Act 2010 and locally protected characteristics.
- Health Impact Assessment: This objective directly addresses health and wellbeing:
  - Ensuring access to green infrastructure means that people can meet their daily needs, ensuring both physical and mental wellbeing.
  - Reducing crime, anti-social behaviour and fear of crime is important for physical and mental wellbeing.

IIA objective 5: Manage waste close to the source and promote sustainable modes of transport

Appraisal questions:

- Will it manage waste as close to source as possible?
- Will it support an overall reduction in the distance travelled by waste, either within the WLWP area or across the wider London area?
- Will it contribute towards a reduction in traffic congestion, particularly where areas of poor air quality might be affected?
- Will it reduce reliance on road-based freight movements and support the use of rail and water where this represents a deliverable, efficient and sustainable choice?
- Will it support the transition from low to ultra-low and then zero emission vehicles for the transportation of waste by road?

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics covered: Air; Climatic factors; Population; Human Health; Biodiversity.
- Equalities Impact Assessment: all Equality Act 2010 and locally protected characteristics.
- Health Impact Assessment: Encouraging active travel, such as walking, wheeling and cycling can have a wider range of positive implications for health, including increased physical activity and opportunities for social interaction. In addition, an increase in active travel would be associated with a decrease in vehicular transport and an associated decrease in air pollutants that can be harmful to human health. Poor air quality can lead to and aggravate respiratory diseases.

IIA objective 6: Protect and enhance the historic environment

Appraisal questions:

- Will it conserve, protect and enhance designated and undesignated heritage assets and their settings?

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics covered: Historic environment; Landscape.
- Equalities Impact Assessment: all Equality Act 2010 and locally protected characteristics.
- Health Impact Assessment: The historic environment can promote wellbeing by providing a sense of place, pride in the local area, and intellectual stimulation.

IIA objective 7: Protect, enhance, restore, and expand biodiversity and geodiversity assets

Appraisal questions:

- Will it avoid effects on habitats of international, national, regional or local importance?
- Will it protect and enhance habitats of international, national, regional or local importance?
- Will it protect and improve local populations of terrestrial species that are of international, national, regional or locally importance?

- Will it avoid harm, protect, and improve local populations of aquatic and wetland species that are of international, national, regional or local importance?
- Will it contribute towards biodiversity net gain?
- Taking into account the impact of climate change, will it conserve and enhance designated and undesignated ecological assets and networks?
- Will it maintain and enhance wildlife corridors and minimise fragmentation of ecological areas and green and blue spaces, enhancing biodiversity and securing the level of net-gain set out in local, regional and national policy?
- Will it avoid negative impact on water quality and therefore biodiversity particularly within aquatic/wetland habitats?
- Will it maintain or contribute towards an improved Water Framework Directive ecological status?
- Will it incorporate Nature Based Solutions to deliver multiple benefits to people and nature at the same time?
- Will it protect and support enhanced knowledge and understanding of geological sites of national, regional or local importance?

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics covered: Biodiversity; Climatic Factors; Soil; Water.
- Equalities Impact Assessment: all Equality Act 2010 and locally protected characteristics.
- Health Impact Assessment: Well-functioning ecosystems provide a range of ecosystem services, including clean air and water, pollination of food crops and opportunities for recreation. Connection with nature can improve mental wellbeing.

IIA objective 8: Protect, enhance, and restore townscapes including open spaces

Appraisal questions:

- Will it minimise the visual intrusion of waste facilities on sensitive and/or distinct townscapes?
- Will it enhance and protect townscape features including open spaces, parks and gardens and their settings?
- Will it provide for the restoration of land to an appropriate after-use including the creation of accessible greenspaces and open spaces at former waste sites?

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics covered: Historic environment; Landscape.
- Equalities Impact Assessment: all Equality Act 2010 and locally protected characteristics.
- Health Impact Assessment: The landscape and townscape can promote wellbeing by providing a sense of place, a sense of peace and beauty, interest and providing sites for recreation.

IIA objective 9: Protect and enhance the quality and quantity of watercourses and water bodies and maximise the efficient use of water

Appraisal questions:

- Will it maximise the efficient use of water?
- Will it protect the quantity of ground and surface water from over abstraction?
- Will it protect and enhance the quality of watercourses and water bodies?

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics covered: Climatic factors; Water; Soil; Population; Human health; Biodiversity.
- Equalities Impact Assessment: Equality Act 2010 and locally protected characteristics:
  - Age: Children (0-4), Younger people (aged 18-24), older people (aged 60 and over);
  - Disability: Disabled people, people with physical and mental impairment; and
  - Pregnancy and maternity.
- Health Impact Assessment: Issues with water quality and availability can result in the spread of disease and impact on mental health. Increased risk of flooding resulting from climate change poses risks to physical and mental health.

IIA objective 10: Manage and reduce flood risk from all sources

Appraisal questions:

- Will it promote the use of SuDS to reduce surface water runoff, nature-based solutions or other flood resilient design measures?
- Will it ensure waste developments are not at risk of flooding both presently and in the future, taking into account climate change, and will it not result in an increase in the risk of flooding elsewhere?

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics covered: Climatic factors; Water; Soil; Population; Human health; Biodiversity.
- Equalities Impact Assessment: Equality Act 2010 and locally protected characteristics:
  - Age: Children (0-4), Younger people (aged 18-24), older people (aged 60 and over);
  - Disability: Disabled people, people with physical and mental impairment; and
  - Pregnancy and maternity.
- Health Impact Assessment: Flooding can result in emotional and financial stress, as well as the spread of disease.

IIA objective 11: Minimise noise, vibration, odour, light and air pollution relating to waste development

Appraisal questions:

- Will it minimise pollution and impacts on amenity, including from noise, vibration, odour and light, from activities associated with waste developments and minimise the potential for such pollution, particularly in areas already subject to noise and light pollution?
- Will it minimise air pollution and help achieve the objectives of Air Quality Management Plans, particularly within the designated AQMAs?

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics covered: Air; Climatic factors; Population; Human health; Biodiversity.
- Equalities Impact Assessment: all Equality Act 2010 and locally protected characteristics.
- Health Impact Assessment: Poor air quality as well as other amenity nuisances can lead to and aggravate respiratory diseases, and impact on mental health.

IIA objective 12: Protect and enhance mineral resources and soils

Appraisal questions:

- Will it ensure the safeguarding of mineral resources from sterilisation by waste management related development?
- Will it safeguard soil quality and quantity and reduce soil contamination?
- Will it avoid the loss of the best and most versatile agricultural land?
- Will it minimise effects on Regionally Important Geological Sites?

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics covered: Material assets; Climatic factors; Soil; Water; Biodiversity; Landscape.
- Equalities Impact Assessment: all Equality Act 2010 and locally protected characteristics.
- Health Impact Assessment: Sustainable use of resources ensures that resources are available for essential infrastructure, including transport, health centres and local amenities. Optimising reuse and minimising waste also benefit the wider environment and the ecosystem services it provides. Best and most versatile land is important for food growing.

Chapter 4

Reasonable alternatives considered for the emerging WLWP

4.1 This chapter provides an outline of the policy approaches considered for the WLWP, and potential waste site options put forward during the Regulation 18 consultation. The IIA findings for those identified as reasonable alternatives is set out in **Appendix E**.

Issues and Options for emerging WLWP

4.2 A set of key strategic issues to be addressed by the emerging WLWP were identified in relation to the emerging WLWP strategic objectives. A number of alternative policy approach options were identified for each key issue as listed below. The issues were identified by the plan-makers as those matters which may act as barriers to the achievement of the draft vision and strategic objectives for the emerging WLWP, whose formulation was informed by a review of national, regional, and local policies and strategies. The issues also took account of the spatial context within the WLWP area.

4.3 The options described below were intended to balance the emerging WLWP's ambition with practicality, seeking to build on West London's strengths (principally its established waste management facility estate and industrial land base) while addressing its challenges (such as other development pressures and environmental constraints on land use).

4.4 The options are not mutually exclusive, and some of the options have been combined and addressed in one policy, or addressed in elements of more than one policy. Where an option is addressed in one or more of the draft policy, the relevant WLWP policy/ies is identified. Deliverable approaches not taken forward in the draft

policies have been considered as “reasonable alternatives” and assessed in this chapter.

Strategic Objective 1: Make Best Use of Existing Waste Infrastructure to Manage Waste Efficiently

- **Issue 1a:** Finite land supply and competing development pressures threaten the retention of West London’s existing waste management capacity.
  - Option 1: No new site allocations – rely on safeguarding existing waste sites (protect existing waste sites and Strategic Industrial Locations from redevelopment). This is the approach in **Policy WLWP1**.
  - Option 2: No new site allocations – rely on safeguarding and intensification of existing waste sites (as per adopted WLWP) and other suitable sites where criteria are met. This is the approach in **Policy WLWP2**.
  - Option 3: Identify Areas of Search or site allocations for waste use – e.g. search within SIL or LSISs or underutilised and previously-developed land. Not addressed in WLWP. **This is a reasonable alternative to Policy WLWP1 and WLWP2**.
- **Issue 1b:** Not all waste generated in West London is currently managed within the sub-region, risking dependence on out-of-Plan area facilities.
  - Option 1: Maximise Plan area capacity to manage all waste streams – support development of facilities to handle wastes currently exported (e.g. residual waste treatment, construction waste recycling) in accordance with the principle of “net self-sufficiency” and the proximity principle. This approach is addressed in elements of **Policy WLWP1, WLWP2, WLWP3 and WLWP5**.
  - Option 2: Continue to utilise facilities outside Plan area for management of residual waste – providing it can be shown to be the most sustainable option (for instance, if a high efficiency Energy from Waste plant outside West London has capacity and can process residual waste with full energy recovery, carbon capture, using low carbon transport). Not addressed in

WLWP. **This is a reasonable alternative to elements of Policy WLWP1, WLWP2, WLWP3 and WLWP5**.

- Option 3: Drive residual waste reduction to minimise exports – complement existing capacity retention and enhancement policies with ambitious waste reduction and recycling targets (see Strategic Objective 2 below), thereby reducing the amount of residual waste that would otherwise need management beyond the Plan area. This approach is partially addressed by elements of **Policy WLWP5 and WLWP6**, although it does not set targets. **Therefore, setting ambitious targets is a reasonable alternative to Policy WLWP5 and WLWP6**.
- Option 4: Facilitate development of deposit of waste on land for residual waste within West London. This is the approach in **Policy WLWP3**.

- **Issue 1c:** Some existing waste sites in West London may be under-utilised and/or not equipped to handle waste in the most efficient, low-carbon manner.
  - Option 1: Facilitate modernisation and upgrading of existing waste facilities – e.g. policy support for installing improved sorting technology, automation, carbon capture and/or electrified processing equipment, and enclosure of operations where appropriate. This approach is addressed by elements of **Policy WLWP1, WLWP2 and WLWP4**.
  - Option 2: Co-locate waste facilities with complementary industries – Promote the integration of waste processing with other industrial or manufacturing uses (for instance, locating plastic recycling close to plastics production, or co-locating an energy-from-waste plant with an adjacent industry or district heating network that uses the heat/power). This approach is addressed by elements of **Policy WLWP1 and WLWP2**.

Strategic Objective 2: Encourage Facilities that Contribute to the Achievement of a Circular Economy to come forward

- **Issue 2a:** Construction activities produce the majority of waste in West London, especially with large regeneration schemes – involving production of large amounts of waste if not designed out at the outset.
  - Option 1: Encourage beneficial use of excavation waste on-site or locally. This approach is addressed by elements of **Policy WLWP2, WLWP5 and WLWP6**.
  - Option 2: Support temporary recycling facilities on major construction sites or dedicated hubs for surplus construction materials. This is the approach in **Policy WLWP2**.
  - Option 3: Promote dedicated CD&E waste recycling facilities in West London – ensure policy supports provision of additional/enhanced capacity for conversion of suitable construction and demolition waste (concrete crushing, aggregate recycling, wood waste recovery, soil treatment) into products at appropriate locations. Safeguard existing sites processing CD&E waste and support their upgrade. This approach is addressed by elements of **Policy WLWP1 and WLWP2**.
- **Issue 2b.** Insufficient segregation of waste and limited capacity for certain recyclable streams are barriers to achieving a fully circular economy.
  - Option 1: Expand or adapt existing waste sites to handle a broader range of materials. This is the approach in **Policy WLWP2**.
  - Option 2: Facilitate development of specialist recycling or processing facilities. This approach is addressed by elements of **Policy WLWP2 and WLWP6**.
  - Option 3: Enable development of new Circular Economy (CE) Hubs. This approach is addressed by elements of **Policy WLWP2**.

Strategic Objective 3: Decarbonise Waste Transport and Processing

- **Issue 3a:** The majority of West London's waste is transported by road, contributing to traffic congestion and carbon emissions.
  - Option 1: Promote rail and water freight for waste movement. Safeguard existing railheads and wharves (e.g. at West Drayton, Brentford, on the Grand Union Canal and River Thames) that may be suitable for intermodal waste transfer. Include policy support/requirements for new or substantially redeveloped waste facilities to evaluate and, where feasible, utilise rail or barge transport for bulk waste. This approach is addressed by elements of **Policy WLWP1 and WLWP2**.
  - Option 2: Encourage consolidation of waste and routeing strategies to reduce road miles. This approach is addressed by elements of **Policy WLWP4**.
  - Option 3: Facilitate transition to low-emission vehicle fleets. While fleet management is not a land-use matter, planning conditions could require new waste facilities to provide electric vehicle charging infrastructure on-site (e.g. for future electric RCVs and service vehicles) and encourage use of non fossil fuel powered vehicles for waste transport. This approach is addressed by elements of **Policy WLWP4**.
- **Issue 3b:** Waste management facilities themselves can contribute to carbon emissions through energy use and, in some cases, direct emissions (e.g. combustion).
  - Option 1: Require low-carbon technology and energy efficiency in waste facilities. This approach is addressed by elements of **Policy WLWP4**.
  - Option 2: Integrate Energy from Waste (EfW) plants with other energy users. This approach is addressed by elements of **Policy WLWP3**.
  - Option 3: Decentralised and local energy solutions from waste. Support smaller-scale waste fuelled projects that would supply energy to communities or specific site. This approach is addressed by elements of **Policy WLWP3**.

Strategic Objective 4: Deliver High Quality Waste Facilities (Protect and Enhance the Environment and Communities)

- **Issue 4a:** Waste operations can negatively impact local environmental quality – causing odour, noise, dust, litter, light pollution and traffic – if not properly controlled. West London sites may be located in proximity to homes or sensitive areas.
  - Option 1: Include strict development management standards within policy for environmental control at waste sites. This approach is addressed by elements of **Policy WLWP4**.
  - Option 2: Implement buffer zones and sensitive site review. This approach is addressed by elements of **Policy WLWP1**.
  - Option 3: Establish whether any particularly poorly sited facilities need relocation (and if so plan for their relocation to less sensitive locations). **This is not considered to be a reasonable alternative** as the deliverability is unlikely, due to being aspirational and only deliverable if the operator is willing to relocate/exit the waste sector.
  - Option 4: Do not safeguard problematic facilities via emerging WLWP. This would involve excluding certain sites from the list of safeguarded existing waste sites to be included in the WLWP, allowing their redevelopment in due course. **This is not considered to be a reasonable alternative** as the deliverability is uncertain and it would not be in conformity with the current London Plan if the site falls within the London Plan's definition of an existing waste site. However, the London Plan (Policy SI9 and para 9.9.2) does allow for plan-led release of some existing waste sites, and this is discussed under the heading 'Safeguarding existing waste sites' below.
  - Option 5: Enforce route restrictions for waste related vehicle movements. This approach is addressed by elements of **Policy WLWP4**.
- **Issue 4b:** Climate change and flood risks pose a threat to existing waste infrastructure, and waste sites need to be resilient and environmentally positive (e.g. through biodiversity gains).

- Option 1: Integrate flood resilience and climate adaptation into waste facility requirements. This approach is addressed by elements of **Policy WLWP4**.
- Option 2: Require landscaping and protection and enhancement of biodiversity at existing waste sites. Not addressed in WLWP. **This is a reasonable alternative to elements of Policy WLWP4**.
- Option 3: Derive positive community benefits from waste sites. This approach is addressed by elements of **Policy WLWP4**.

Strategic Objective 5: Ensure sufficient capacity of the right type in the right place so that unavoidable residual waste produced is managed safely and effectively

- **Issue 5a:** Some waste that could be recycled is managed at residual waste management facilities.
  - Option 1: Proposals for residual waste management facilities should be required to demonstrate that they will only accept waste that is unavoidable. This approach is addressed by elements of **Policy WLWP3**.
  - Option 2: Proposals should be accompanied by a Waste Hierarchy statement that sets out the steps that will be taken to ensure only unavoidable residual waste is managed at the facility and that doing so is the best environmental outcome in line with the waste hierarchy. This approach is addressed by elements of **Policy WLWP3**.

4.5 In summary, the four reasonable alternative policy approaches that have been assessed are:

- Issue 1a, Option 3: Identify Areas of Search or site allocations for waste use (reasonable alternative to **Policy WLWP1 and WLWP2**)

- Issue 1b, Option 2: Continue to utilise facilities outside Plan area for management of residual waste (reasonable alternative to elements of **Policy WLWP1, WLWP2, WLWP3 and WLWP5**)
- Issue 1b, Option 3: Drive residual waste reduction to minimise exports (setting ambitious targets is a reasonable alternative to **Policy WLWP5 and WLWP6**)
- Issue 4b, Option 2: Require landscaping and protection and enhancement of biodiversity at existing waste sites (reasonable alternative to elements of **Policy WLWP4**)

4.6 The IIA findings for the reasonable alternative policy approaches are presented in **Appendix E**.

Safeguarding existing waste sites

4.7 Although not identified in the options above while drafting the policies in the emerging WLWP, the West London Waste Planning Authorities did consider different options for safeguarding existing waste sites, including the release of some of the safeguarded sites in the adopted WLWP for uses other than waste.

4.8 In terms of the approach to identifying the existing waste sites proposed to be safeguarded in the emerging WLWP, a number of reasonable alternatives were identified:

- Safeguarding all sites that have planning permission for waste use or an environmental permit (as per the definition in the London Plan). This includes sites that hold an environmental permit but have no planning permission. This is partly addressed by **Policy WLWP1**, which safeguards existing sites with planning permission for waste use, but not sites that only hold an environmental permit (see below).
- Safeguarding sites that have Certificate of Lawful Existing Use or Development (CLEUD) for a waste use, or deemed lawful in planning terms. This approach is addressed by **Policy WLWP1**.

- Safeguarding sites that only hold an environmental permit for waste use but do not have a valid planning permission, a CLEUD or are not considered lawful under planning legislation. This was **not considered a reasonable alternative** as while such sites benefit from an Environmental Permit issued by the Environment Agency for waste-related operations, this relates to pollution control only and does not mean that the site will have been subject to proper assessment through the planning application process.
- Release some safeguarded sites to enable re-development for non-waste uses (provided capacity of the existing safeguarded waste site is shown to be surplus to requirement for London as a whole over the Plan period). This approach is addressed by elements of **Policy WLWP1**.

4.9 The likely effects of safeguarding existing sites that have planning permission for waste use, a CLEUD for a waste use, or are deemed lawful in planning terms have been assessed and described in relation to Policy WLWP1 in **Chapter 5**. Similarly, the potential release of some safeguarded sites for re-development for non-waste uses has been assessed. However, the effects of releasing some of the adopted safeguarded sites, as listed in Appendix 2 of the WLWP, and their subsequent redevelopment for non-waste uses (e.g. housing, mixed use, other employment uses) has not been assessed in this IIA. While any ongoing effects of the waste use on those sites will cease, new effects from construction of different development types may occur, but the effects of that new development will be assessed through the individual borough's and/or OPDC's Local Plan IIA process.

Potential waste site options

4.10 Although the WLWP does not need to allocate new waste sites due to there being sufficient capacity available in existing waste facilities, the consultation for the emerging WLWP at Regulation 18, did provide an opportunity for organisations to respond and put forward a site for a specific waste management development through a 'Call for Sites' exercise.

4.11 Three sites were put forward under the Call for Sites exercise as follows:

- Broadwater Lake, Tarmac (LB Hillingdon). The call for sites response was seeking to safeguard and allocate the site as a waste management development to infill the former sand and gravel quarry with non-hazardous excavation waste and create new habitats at the lake. However, a separate planning application was already in progress for the redevelopment of the site to create an outdoor activity centre. The application was approved by planning committee in April 2026 (Application ref: 2382/APP/2023/2906), subject to the signing of a S106 agreement. It is also acknowledged that there are several planning policy designations including SSSI, SINC, Flood Zones 2 and 3 and Green Belt land that would heavily restrict development on-site. The site is not a reasonable alternative as it is unlikely to be available due to the proposed outdoor activity use
- High View Farm, Envar Composting (LB Hillingdon). The site is already in existing operation as a green waste composting facility. The call for sites response was seeking to increase the site footprint by adding several parcels of land adjacent to the northern section of the existing Envar Compost site boundary for future proposed open air green waste composting. This site is considered a reasonable alternative and has been subject to IIA.
- McGovern Plant/The Wet Waste Company (LB Hounslow). The site is already in existing waste use, including a physical screening operation using high intensity washing of non-hazardous street cleansing waste, mineral waste and aqueous wastes. The call for sites response was seeking to ensure that the existing waste use (which does not currently benefit from planning consent) is referenced and afforded protection within the WLWP. This site is considered a reasonable alternative and has been subject to IIA.

4.12 The two reasonable alternative waste site options have been assessed in line with the IIA site assessment criteria set out in **Appendix D**. The IIA findings are presented in **Appendix E**.

4.13 Upon detailed review of the proposed site options, the waste planning authorities discounted all three site options proposed through the Call for Sites exercise. For the latter two site options (High View Farm and The Wet Waste Company), the waste planning authorities determined that the inclusion of each site for allocation was neither necessary or justified . With respect to the High View Farm

site, this was based on the conclusion that given the lack of additional capacity being proposed and the lack of an identified shortfall in capacity in the WLWP for the apportioned waste, the allocation of the additional land was not necessary or justified. The Wet Waste site is currently operational subject to an environmental permit but the site requires a retrospective planning application for regularisation. It was concluded that the site was not necessary or justified as the primary request related to the site being safeguarded which would only be achieved should an application for regularisation be submitted. Therefore, the three site options proposed in the Call for Sites exercise have not been allocated in the WLWP. Full details of the waste planning authorities' reasons are provided in the supporting documents to the WLWP.

Chapter 5

IIA of the Regulation 19 West London Waste Plan

5.1 This chapter records the IIA findings for the WLWP. The Regulation 19 WLWP has set out a vision and five strategic objectives:

- Strategic Objective 1: Make best use of existing waste infrastructure to manage waste efficiently.
- Strategic Objective 2: Encourage facilities that contribute to the achievement of a Circular Economy to come forward.
- Strategic Objective 3: Decarbonise Waste Transport and Processing.
- Strategic Objective 4: Deliver high quality waste facilities (protect and enhance the environment and communities).
- Strategic Objective 5: Ensure sufficient capacity of the right type in the right place so that unavoidable residual waste produced is managed safely and effectively.

5.2 These strategic objectives have not changed significantly from what was presented in the emerging Regulation 18 WLWP. Minor changes have been made to clarify and strengthen the objective wording.

5.3 There are seven strategic policies set out in the WLWP. In some cases, there may be overlap between the policies of the Borough's Local Plans and the policies in this Plan; where this occurs the latest policy to have been adopted will normally take precedence. The policies are:

- Policy WLWP 1 – Safeguarding and Optimising the Waste Site Network
- Policy WLWP 2 – Provision of Additional Waste Management Capacity
- Policy WLWP 3 – Residual Waste Management and Energy Recovery

- Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities
- Policy WLWP 5 – Recovery and Disposal of Waste to Land
- Policy WLWP 6 – Circular Economy and Resource Efficiency
- Policy WLWP 7 – Provision of Wastewater Treatment Infrastructure

5.4 One new policy (WLWP 7) has been added to the Regulation 19 WLWP. The remaining policies (WLWP 1 to WLWP 6) have not changed significantly from what was presented in the emerging Regulation 18 WLWP with the exception of the deletion of sub-section G of Policy WLWP1. Minor changes have been made to clarify and strengthen the other policy titles and wording.

Vision and strategic objectives

5.5 Section 6 of the WLWP Regulation 19 document outlines the vision and strategic objectives for the emerging plan.

5.6 The overarching vision for the WLWP is shown below. The vision has not significantly changed from what was presented in the emerging WLWP (Regulation 18):

> To contribute to the ambition of being **net zero** by 2030 across west London, land to be used for waste management over the next 15 years will focus on the **efficient and flexible use of safeguarded waste sites, railheads and wharves** for waste. This will allow **waste materials to be managed as a valuable resource,** keeping them in circulation through innovative re-use, repair, and high-quality recycling for as long as possible in line with circular economy principles.
>
> A **zero-waste to disposal** approach will exist whereby any waste produced in west London is managed applying the waste hierarchy in priority order, with

residual waste being minimised, and maximum value recovered from any remaining unavoidable residual waste through high efficiency low-carbon recovery facilities if needed.

The **network of management facilities** across west London will continue to ensure that **at least an equivalent amount** of waste produced within west London is managed within it, plus a contribution is made to achieving net self-sufficiency for London as a whole, as necessary. There will be sufficient flexibility to manage waste from outside the Plan area where this represents a sustainable option that supports circular economy goals. This, together with sustainable transport options, will minimise adverse impacts on road networks and local air quality.

Through partnerships between local authorities, businesses, and local communities, west London will have established a network of **Circular Economy Hubs**, that foster innovation in waste prevention, material exchange and reuse, and repair. These hubs will help drive green business growth, sustainable entrepreneurship, and job creation, ensuring the transition to a low-carbon circular economy continues strengthening local prosperity, material security and skills development through education and community engagement.

Carbon emissions from west London's waste management system will have been virtually eliminated through:

- electrification of operations using renewable and other clean/ zero carbon energy sources,
- use of sustainable waste transport and low-emission collection services
- minimisation of greenhouse gas emissions that may arise from specific types of waste management facilities.

All waste infrastructure will be **resilient to climate change**, meet all relevant **environmental standards** as a minimum and meet evolving operational needs.

5.7 Five draft strategic objectives have been defined to support the delivery of the overarching vision:

Strategic Objective 1: Make best use of existing waste infrastructure to manage waste efficiently

- Safeguard existing waste sites across west London to retain sufficient capacity to manage at least the equivalent tonnage of waste arising in west London plus an amount from elsewhere in London, if needed.
- Encourage development of operations at existing waste sites to improve efficiency, throughput and quality of outputs through innovation, automation, and proximity to material and energy users.
- Encourage appropriate co-location of waste uses with other industrial uses to promote circular economy solutions as part of a west London wide network
- Safeguard capacity, capability and future potential of existing waste management facilities from being compromised by incompatible proximate development such as housing, including by implementing the Agent of Change principle when applications for development are being considered.

Strategic Objective 2: Encourage facilities that contribute to the achievement of a Circular Economy to come forward

- Support local Circular Economy Hubs that facilitate material exchange, re-use and remanufacturing. This may comprise a network of local facilities combined with larger-scale infrastructure that may be outside a waste use.
- Provide for waste management capacity that supports production of high quality material from waste suitable for direct utilisation by material users.

Strategic Objective 3: Decarbonise Waste Transport and Processing

- Utilise and expand sustainable transport options for waste movement, including rail and water freight, to reduce road-miles, by safeguarding railheads and wharves in waste use.
- Require waste management facilities to integrate low-carbon technologies.

- Require waste-to-energy development to be integrated with local energy supply networks from day 1 of their operation, and maximise re-use of any residues produced.

Strategic Objective 4: Deliver high quality waste facilities (protect and enhance the environment and communities)

- Ensure all waste infrastructure development implements best practice for protection of the environment and local amenity.
- Minimise unacceptable adverse impacts of waste management operations.
- Require that waste development contributes to local employment and sustainability objectives.

Strategic Objective 5: Ensure sufficient capacity of the right type in the right place so that unavoidable residual waste produced is managed safely and effectively

- Only consent facilities for the management of residual waste where it is shown that the waste to be managed is unavoidable.
- Ensure that such facilities operate to best practice with minimal adverse impact to the locality and the environment as a whole, including greenhouse gas emissions.

Likely effects of the overarching vision and strategic objectives

5.8 Given the clear aspirational relationship between the overarching vision and five strategic objectives, these two components of the Regulation 19 WLWP have been appraised together. **Table 5.1** below sets out the likely effects of the vision and strategic objectives. The reasoning for the identification of these likely effects is set out by IIA objective below the table. It is confirmed that there have been no significant changes to what was presented as part of the Regulation 18 IIA.

Table 5.1: Summary of IIA findings for the WLWP Vision and Strategic Objectives

IIA Objectives	Overarching Vision	Strategic Objective 1: Make best use of existing waste infrastructure to manage waste efficiently	Strategic Objective 2: Encourage facilities that contribute to the achievement of a Circular Economy to come forward	Strategic Objective 3: Decarbonise Waste Transport and Processing	Strategic Objective 4: Deliver high quality waste facilities (protect and enhance the environment and communities)	Strategic Objective 5: Ensure sufficient capacity of the right type in the right place so that unavoidable residual waste produced is managed safely and effectively
IIA1: Climate change mitigation	++	+	+	++	+	+/-
IIA2: Waste hierarchy	++	++	++	++	0	-
IIA3: Economy	+	+	+	0	+	0
IIA4: Health and wellbeing	+	+	+	+	+	+
IIA5: Sustainable transport	++	+	+	++	0	+

IIA Objectives	Overarching Vision	Strategic Objective 1: Make best use of existing waste infrastructure to manage waste efficiently	Strategic Objective 2: Encourage facilities that contribute to the achievement of a Circular Economy to come forward	Strategic Objective 3: Decarbonise Waste Transport and Processing	Strategic Objective 4: Deliver high quality waste facilities (protect and enhance the environment and communities)	Strategic Objective 5: Ensure sufficient capacity of the right type in the right place so that unavoidable residual waste produced is managed safely and effectively
IIA6: Historic environment	0	0	0	0	+?	+?
IIA7: Biodiversity and geodiversity	0	0	0	0	+?	+?
IIA8: Open spaces and townscapes	0	+	0	0	+?	+?
IIA9: Water	0	0	0	0	+?	+?
IIA10: Flooding	+	0	0	0	+?	0
IIA11: Noise, light and air pollution	++	+	+	+	+?	+?

IIA Objectives	Overarching Vision	Strategic Objective 1: Make best use of existing waste infrastructure to manage waste efficiently	Strategic Objective 2: Encourage facilities that contribute to the achievement of a Circular Economy to come forward	Strategic Objective 3: Decarbonise Waste Transport and Processing	Strategic Objective 4: Deliver high quality waste facilities (protect and enhance the environment and communities)	Strategic Objective 5: Ensure sufficient capacity of the right type in the right place so that unavoidable residual waste produced is managed safely and effectively
IIA12: Mineral resources and Soils	+	+	0	0	+?	-

IIA objective 1: Minimise the WLWP's contribution to climate change and promote climate resilient infrastructure

5.9 The Vision is likely to have a significant positive effect in relation to this IIA objective because it promotes the circular economy, the efficient use of waste sites and waste materials, and contribution towards net zero. In addition, it promotes the use of clean or zero carbon energy sources for operations, and the use of sustainable transport, which would likely reduce greenhouse gas emissions associated with waste management. Furthermore, in seeking to ensure waste produced in West London can be managed in West London, it would help reduce the need for transportation of waste to more distant locations, thereby reducing greenhouse gas emissions.

5.10 Strategic Objective 3 is also likely to have a significant positive effect on this IIA objective as it promotes the use of sustainable transport and reducing road-miles, and use of low-carbon technologies in waste management facilities. This is likely to help minimise greenhouse gas emissions.

5.11 Strategic Objectives 1, 2 and 4 are likely to have minor positive effects on this IIA objective as they support the circular economy, improve efficiency of operations, and reduced need to transport waste through proximity to material and energy users. Strategic Objective 2 supports the establishment of Circular Economy Hubs which facilitate material exchange, re-use and manufacturing. Although Strategic Objective 4 does not explicitly refer to minimising emissions, it does require waste developments to contribute to sustainability objectives.

5.12 Strategic Objective 5 could have a mixed minor negative and positive effect as it allows for the potential development of residual waste management facilities such as non-inert landfills and anaerobic digestion plants that would produce methane, or thermal treatment facilities where carbon emissions would be released rather than used for energy recovery. However, it is recognised that this is only to be allowed in circumstances where the residual waste to be managed is unavoidable. In addition, Strategic Objective 2 seeks to ensure that such facilities operate to best practice with

minimal adverse impact to the environment as a whole including greenhouse gas emissions.

IIA objective 2: Move treatment of waste up the Waste Hierarchy

5.13 The Vision is expected to have a significant positive effect in relation to this IIA objective as it encourages re-use, recycling and recovery of waste, and a circular economy, driving waste up the waste hierarchy. Furthermore, establishment of circular economy hubs, would help prevent waste, and facilitate material exchange and reuse, and repair.

5.14 Significant positive effects are also likely for Strategic Objectives 1, 2 and 3 for this IIA objective as they promote a circular economy, including exchange, reuse and recycling of materials. This would reduce the overall amount of waste. Strategic Objective 1 also seeks to retain sufficient capacity to manage the waste arising in West London, and safeguard capacity and potential of existing waste management facilities. The requirement for waste-to-energy projects to maximise re-use of any residues produced would help further reduce amount of waste produced.

5.15 Minor negative effects are expected for Strategic Objective 5 as it allows for the potential development of residual waste management facilities, which are at the bottom of the waste hierarchy. However, it is recognised that this is only to be allowed in circumstances where the residual waste to be managed is unavoidable.

IIA objective 3: Support, maintain and enhance the development of an inclusive economy

5.16 The Vision and Strategic Objectives 1, 2 and 4 are likely to have minor positive effects for this IIA objective because they support the establishment of Circular Economy Hubs which would help drive green business growth, sustainable entrepreneurship, and would create local jobs. In addition, Strategic Objective 1

promotes improved efficiency and quality of outputs through innovation, automation and proximity to energy and material users. This would help deliver greater economic benefits to waste management companies and facilities, and energy and material users. Furthermore, the colocation of waste uses with other industrial uses may have further economic benefits due to their proximity to one another, reducing the need for transport. This is enhanced by Strategic Objective 2 which supports production of material from waste suitable for direct use by other users.

5.17 The other strategic objectives are expected to have a negligible effect, as they are not directly linked to the themes of this IIA objective.

IIA objective 4: Protect and improve people's health

5.18 The Vision and all five Strategic Objectives are likely to have a minor positive effect against this IIA objective as they promote skills development through education and community engagement, and reduction of carbon emissions during transport and operations, which would help improve air quality and subsequently have benefits for health. Furthermore, the establishment of Circular Economy Hubs would create employment opportunities for the local population. In particular, Strategic Objective 4 seeks to ensure waste development implements best practice for protection of local amenity and minimises adverse effects. Strategic Objective 5 also seeks to ensure that residual waste management facilities would have minimal adverse impact on the locality, which would include amenity of the local population. The co-location of facilities with industrial uses, as set out in Strategic Objective 1, would help reduce effects on the local population by concentrating development in already industrial areas.

IIA objective 5: Manage waste close to the source and promote sustainable modes of transport

5.19 The Vision and Strategic Objective 3 are likely to have significant positive effects in relation to this IIA objective as they support the use of sustainable and low-emission waste transport and collection services, and promote the use of rail and

water freight to reduce road miles. The Vison seeks to ensure waste produced in West London is managed within West London, thereby reducing the overall need for transportation.

5.20 Minor positive effects are likely for Strategic Objectives 1, 2 and 5 as they seek to reduce the need to travel by co-locating waste facilities with other industries, establish local Circular Economy Hubs, and ensure local management of unavoidable residual waste arising in West London reducing the need for this waste to be transported further afield.

5.21 Strategic Objective 4 is expected to have a negligible effect, as it is not directly linked to the themes of this IIA objective.

IIA objective 6: Protect and enhance the historic environment

5.22 The Vision makes no specific references to the historic environment, therefore its effects in relation to this IIA objective is considered to be negligible.

5.23 Strategic Objectives 4 and 5 are likely to have minor positive effects in relation to this IIA objective as they require waste infrastructure developments to implement best practice for the protection of the environment, which may include the historic environment. In addition, Strategic Objective 4 seeks to minimise adverse impacts of waste management operations, which would include adverse impacts on the historic environment. However, these effects are uncertain, as they will depend on the specific location and design of any new/redeveloped waste management proposals that come forward.

5.24 The other strategic objectives are expected to have a negligible effect, as they are not directly linked to the themes of this IIA objective.

IIA objective 7: Protect, enhance, restore, and expand biodiversity and geodiversity assets

5.25 The Vision makes no specific references to biodiversity and geodiversity, therefore its effects in relation to this IIA objective is considered to be negligible.

5.26 Strategic Objectives 4 and 5 are likely to have minor positive effects in relation to this IIA objective as they require waste infrastructure developments to implement best practice for the protection of the environment, which may include biodiversity and geodiversity. In addition, Strategic Objective 4 seeks to minimise adverse impacts of waste management operations, which would include adverse impacts on biodiversity and geodiversity. However, these effects are uncertain, as they will depend on the specific location and design of any new/redeveloped waste management proposals that come forward.

5.27 The other strategic objectives are expected to have a negligible effect, as they are not directly linked to the themes of this IIA objective.

IIA objective 8: Protect, enhance, and restore townscapes including open spaces

5.28 The Vision makes no specific references to open spaces or townscapes, therefore its effect in relation to this IIA objective is considered to be negligible.

5.29 Strategic Objectives 4 and 5 are likely to have minor positive effects in relation to this IIA objective as they require waste infrastructure developments to implement best practice for the protection of the environment, which may include open spaces and townscape. In addition, Strategic Objective 4 seeks to minimise adverse impacts of waste management operations, which would include adverse impacts on the townscapes and open spaces. However, these effects are uncertain, as they will depend on the specific location and design of any new/redeveloped waste management proposals that come forward.

5.30 In addition, Strategic Objective 1 is likely to have minor positive effects on this IIA objective as it promotes the colocation of waste uses with other industrial uses which may minimise adverse impacts on townscape character.

5.31 The other strategic objectives are expected to have a negligible effect, as they are not directly linked to the themes of this IIA objective.

IIA objective 9: Protect and enhance the quality and quantity of watercourses and water bodies and maximise the efficient use of water

5.32 The Vision makes no specific references to the water environment, therefore its effect in relation to this IIA objective is considered to be negligible.

5.33 Strategic Objectives 4 and 5 are likely to have minor positive effects in relation to this IIA objective as they require waste infrastructure developments to implement best practice for the protection of the environment, which may include the water environment. In addition, Strategic Objective 4 seeks to minimise adverse impacts of waste management operations, which would include adverse impacts on water quality. However, these effects are uncertain, as they will depend on the specific location and design of any new/redeveloped waste management proposals that come forward.

5.34 The other strategic objectives are expected to have a negligible effect, as they are not directly linked to the themes of this IIA objective.

IIA objective 10: Manage and reduce flood risk from all sources

5.35 Whilst there is no direct reference to flooding or SuDS and nature-based solutions, the Vision emphasises the need for waste facilities to be resilient to climate change. The Vision therefore has a minor positive effect against this IIA objective.

5.36 Strategic Objective 4 is likely to have minor positive effects in relation to this IIA objective as it requires waste infrastructure developments to implement best practice for the protection of the environment, and contribute towards sustainability objectives, which may include avoiding development within areas at risk of flooding. However, this effect is uncertain, as they will depend on the specific location and design of any new/redeveloped waste management proposals that come forward.

5.37 The other strategic objectives are expected to have a negligible effect, as they are not directly linked to the themes of this IIA objective.

IIA objective 11: Minimise noise, vibration, odour, light and air pollution relating to waste development

5.38 Although there are no direct references to minimising pollution within the Vision, it does seek a reduction of carbon emissions through use of sustainable and low-emission waste transport and collection services. Furthermore, the promotion of efficient use of waste, and locating waste management facilities close to their source, and delivery of net zero, would directly result in reduction in pollution across West London. Therefore, a significant positive effect is recorded against this IIA objective.

5.39 Minor positive effects are likely for Strategic Objectives 1-5 as these encourage the improved efficiency of operations at waste sites and minimisation of greenhouse gasses. They also support the use of sustainable transport and establishment of local facilities which would reduce the need to travel. This would further reduce greenhouse gas emissions and the associated air pollution. Furthermore, Strategic

Objective 4 encourages the implementation of best practice for protection of the environment and minimisation of unacceptable adverse impacts during operation, which may include impacts on air quality. Similarly, Strategic Objective 5 seeks to ensure that residual waste management facilities would have minimal adverse impact on the locality and the environment as a whole. However, the effects for Strategic Objectives 4 and 5 are uncertain, as they will depend on the specific location and design of any new/redeveloped waste management proposals that come forward.

IIA objective 12: Protect and enhance mineral resources and soils

5.40 The Vision promotes the efficient and flexible use of safeguarded waste sites, railheads and wharves. Promoting the flexible use may result in less land being taken elsewhere to develop alternative waste sites. There is therefore a minor positive effect in relation to this IIA objective.

5.41 Minor positive effects are likely for Strategic Objectives 1 and 4 for this IIA objective. Strategic Objective 1 supports the safeguarding of existing waste sites and encourages colocation with existing industrial uses which may result in less land take elsewhere. Strategic Objectives 4 and 5 both seek to minimise adverse effects on the environment arising from waste management activities, which includes impacts on soil quantity and quality, and impact on agricultural land. However, Strategic Objective 5 does allow for facilities for the management of residual waste to be developed which may include non-inert landfills. This would not protect mineral resources and soils and therefore have a minor negative effect on this IIA objective, albeit this would only be allowed where it is shown that the waste to be managed is unavoidable.

5.42 The other strategic objectives are expected to have a negligible effect, as they are not directly linked to the themes of this IIA objective.

Policies

5.43 There are seven policies in Section 9 of the Regulation 19 WLWP document:

- Policy WLWP 1 – Safeguarding and Optimising Waste Site Network.
- Policy WLWP 2 – Provision of additional Waste Management Capacity.
- Policy WLWP 3 – Residual Waste Management and Energy Recovery.
- Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities.
- Policy WLWP 5 – Recovery and Disposal of Waste to Land.
- Policy WLWP 6 – Circular Economy and Resource Efficiency.
- Policy WLWP 7 – Provision of Wastewater Treatment Infrastructure.

5.44 Each policy is accompanied by a paragraph setting out the purpose of the policy, and supporting text to help with the implementation of the plan. The policies within the WLWP would be applied when making decisions on the suitability of any proposals for waste development in West London.

5.45 Relevant policies included in the adopted Local Plan of the local planning authority (LPA) within which the proposal is located will also be applied. Where there is overlap between the policies of the LPA's Local Plans and the policies in the WLWP, the latest policy to have been adopted will, in most instances, take precedence. Such policies will include requirements relating to wider issues concerning the protection and enhancement of communities and the natural environment.

5.46 Previously, at Regulation 18 stage, the emerging WLWP had six policies. A summary of the IIA findings for the Regulation 18 WLWP policies is provided in **Appendix E**.

Likely effects of the policies

5.47 The likely sustainable effects of the policies are set out in **Table 5.2** and described below.

Table 5.2: Summary of IIA findings for the Regulation 19 WLWP policies

IIA Objectives	Policy WLWP 1 – Safeguarding and Optimising the Waste Site Network	Policy WLWP 2 – Provision of additional Waste Management Capacity	Policy WLWP 3 – Residual Waste Management and Energy Recovery	Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities	Policy WLWP 5 – Recovery and Disposal of Waste to Land	Policy WLWP 6 – Circular Economy and Resource Efficiency	Policy WLWP 7 – Wastewater Infrastructure
IIA1: Climate change mitigation	+	+/-	+/-	++	+/-	+	+?
IIA2: Waste hierarchy	++	++	+/-	+/-	+/-	++	+
IIA3: Economy	+	+	+	-	+?	+	+
IIA4: Health and wellbeing	+	+	+	++/-?	+?	+?	+
IIA5: Sustainable transport	+	+/-	+/-?	+	0	+	+
IIA6: Historic environment	0?	+/-?	-?	++/-?	+/-?	0	+/-?

IIA Objectives	Policy WLWP 1 – Safeguarding and Optimising the Waste Site Network	Policy WLWP 2 – Provision of additional Waste Management Capacity	Policy WLWP 3 – Residual Waste Management and Energy Recovery	Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities	Policy WLWP 5 – Recovery and Disposal of Waste to Land	Policy WLWP 6 – Circular Economy and Resource Efficiency	Policy WLWP 7 – Wastewater Infrastructure
IIA7: Biodiversity and geodiversity	0?	+/-?	-?	++/-?	+/-	0	+/-?
IIA8: Open spaces and townscapes	0?	+/-?	-?	++/-?	+/-	+?	+/-?
IIA9: Water	0?	+/-?	-?	+/-	+/-?	0	+?
IIA10: Flooding	0?	+/-?	-?	+	+/-	0	+/-?
IIA11: Noise, light and air pollution	+	+/-?	+/-?	+	+/-	0	+/-?
IIA12: Mineral resources and Soils	+	+	-	+/-?	+	+	+/-

5.48 The reasoning for the identification of these likely effects is set out by IIA objective below.

IIA objective 1: Minimise the WLWP's contribution to climate change and promote climate resilient infrastructure

5.49 Policy WLWP 1 safeguards waste sites and ensures there is adequate waste capacity within the plan area. The policy is expected to have a minor positive effect on IIA1, as maintaining an adequate network of waste sites within the plan area would minimise the distance waste needs to travel, minimising emissions from transport. Furthermore, the policy encourages co-location of waste management facilities together and nearby complementary activities, which would further reduce the need for transportation of waste and the associated carbon emissions.

5.50 Policy WLWP 2 supports the provision of additional waste management facilities subject to meeting criteria, including being located in areas where existing transport links are adequate. This may encourage greater use of vehicles for transportation of waste and for people travelling to and from the facilities, which would result in increased emissions. However, the policy also sets out that the development should make use of sustainable modes of transport (e.g. rail or water) for the transportation of materials where practicable and economically viable, which would reduce vehicle derived carbon emissions. Therefore, overall, the effects identified for Policy WLWP 2 in relation to IIA1 are mixed minor positive and minor negative.

5.51 Policy WLWP 3 is expected to have mixed minor positive and minor negative effects in relation to IIA1 as it supports the development of energy from waste and energy recovery facilities which would reduce the need for use of other types of fuels, including fossil fuels and the emissions associated with them. Energy recovered or created through waste incineration could support

local heat networks in West London. Furthermore, the policy outlines that energy from waste facilities must demonstrate the release of carbon emissions would be minimised. However, the policy supports the delivery of residual waste management facilities (e.g., non-inert landfills and anaerobic digestion plants) that would produce methane, or thermal treatment facilities where carbon emissions would be released rather than used for energy recovery. Although the policy states that this is only to be allowed in circumstances where the residual waste to be managed is unavoidable. Overall, the effects identified for IIA1 are minor positive mixed with minor negative.

5.52 Policy WLWP 4 seeks to minimise greenhouse gas as far as practicable from all aspects of operation, promotes the use of electric vehicles, and seeks to ensure development is resilient to a changing climate. In addition, the policy outlines that development should demonstrate that the proximity principle has been complied with, so that any new waste development is close to the source of waste. This would reduce the need to transport waste further distances, and would reduce vehicle-derived emissions. As such, significant positive effects are expected in relation to IIA1.

5.53 Policy WLWP 5 seeks to maximise landfill gas capture which can be used for energy. These provisions would help reduce greenhouse gas emissions and as such, a minor positive is expected in relation to IIA1.

5.54 Policy WLWP 6 seeks to support the transition to a low-carbon circular economy. The policy encourages the reuse, recycling and recovery of materials which will reduce the need for new materials to be produced, and the potential greenhouse gas emissions associated with this. In addition, the supporting text outlines that the co-location of waste uses with complementary industrial uses will be supported where it enhances resource efficiency. The policy therefore will reduce the need to transport waste, having minor positive effects in relation to IIA1.

5.55 Policy WLWP 7 is expected to have a minor positive effect in relation to IIA1. The policy safeguards and promotes wastewater infrastructure to ensure there is adequate wastewater treatment capacity within the plan area, which

should help to reduce the need to transport outputs of wastewater treatment. The supporting text for the policy also acknowledges the potential for re-use and recovery of sewage sludge (the output of treatment) as fertiliser, or as a biogas through further treatment by anaerobic digestion, or energy through incineration. The effect is uncertain as it will depend on the treatment applied.

IIA objective 2: Move treatment of waste up the Waste Hierarchy

5.56 Policy WLWP 1 requires the safeguarding of existing facilities and the provision of appropriate waste capacity within the plan area. The policy supports the optimisation of waste management, and requires the capacity of redeveloped sites to be no less than the assessed potential capacity unless it would result in waste being managed further up the waste hierarchy. The policy therefore supports improved efficiency of management of waste. Opportunities to co-locate waste management facilities together or near complementary activities may further encourage the management of waste higher up the hierarchy. In addition, where safeguarded sites are released for non-waste uses, the policy requires the replacement capacity must be at or above the same level of the waste hierarchy as the capacity it would replace. This will further support and encourage the movement of waste up the waste hierarchy. Therefore, significant positive effects are recorded in relation to this IIA objective.

5.57 Policy WLWP 2 supports the provision of additional waste management capacity, including hazardous waste, where it can be demonstrated that it meets the specific need for waste arising in West London. The policy stipulates that facilities should manage waste as high up the waste hierarchy as possible and should include re-use, repair and remanufacturing activities such as Circular Economy Hubs. The policy also encourages the re-use and exchange of Construction, Demolition and Excavation (C, D & E) waste. This is expected to have significant positive effects with regards to IIA2.

5.58 Policy WLWP 3 is expected to have mixed minor positive and minor negative effects with relation to IIA2. The policy sets out that proposals for residual waste facilities must not undermine recycling, and that any incoming waste should be dealt with in accordance with the waste hierarchy and in priority order. Furthermore, with regards to energy from waste proposals, residuals should be managed prioritising further recovery first, with safe disposal as a last resort. This is expected to have minor positive effects with regards to IIA2. However, the policy does still support residual waste development where it cannot be managed higher up the hierarchy, although this is only to be allowed in circumstances where the residual waste to be managed is unavoidable.

5.59 Policy WLWP 4 supports the development of waste management facilities subject to meeting certain criteria. As such, this policy supports a range of waste facilities, including those that are at the top of the waste hierarchy but also potentially residual waste facilities, which are at the bottom of the waste hierarchy. As such, mixed minor positive and minor negative effects are expected in relation to IIA2.

5.60 Policy WLWP 5 is expected to have mixed minor positive and minor negative effects with relation to IIA2. It supports the re-use, recycling and recovery of waste as a priority before its disposal to land or landfill. As such, a minor positive effect is expected in relation to IIA2, given the limiting nature of the policy. Nonetheless, it does still allow for some landfill proposals to come forward, and landfill is at the bottom of the waste hierarchy, hence the minor negative effect recorded as well.

5.61 Policy WLWP 6 provides strong support for a circular economy. It supports the reuse, recycling and recovery of resources throughout the life of the development and it is a requirement that evidence is provided on how circular economy principles have been applied through the design, construction, and operation of the development. In addition, the policy seeks to ensure materials are managed at the highest level of the waste hierarchy, and supporting text outlines that Circular Economy Hubs may help achieve this through material exchange, re-use and remanufacturing. As such, this policy is expected to have significant positive effects with regards to IIA2.

5.62 Policy WLWP 7 supports the safeguarding and upgrading of existing wastewater treatment infrastructure and provision of new infrastructure within the plan area if there is an identified need. The resulting sewage sludge from wastewater treatment could be further treated via anaerobic digestion or energy from waste incineration. The policy therefore supports some movement of waste up the waste hierarchy and a minor positive effect is therefore expected in relation to this IIA objective.

IIA objective 3: Support, maintain and enhance the development of an inclusive economy

5.63 Policy WLWP 1 provides support for the safeguarding and optimisation of waste sites within West London. Policies WLWP 2 and 3 allow for redevelopment or development of new waste management facilities in West London. The development of safeguarded sites would provide local employment opportunities. Therefore, these policies are expected to have a minor positive effect on this IIA objective.

5.64 Policy WLWP 4 sets out measures which encourage more sustainable development, including being resilient to climate change, minimising greenhouse gas emissions and providing vehicle charging points. These measures may be costly to invest in, which may influence the profitability and viability of certain waste management practices with minor adverse effects against this objective.

5.65 Policy WLWP 5 is concerned with controlling the deposit of waste to land, and promotes after uses on landfill sites which are appropriate and enhance the surrounding landscape. By ensuring that landfill is controlled appropriately, this policy would help prevent negative effects on existing businesses. Appropriate after uses on landfill sites (e.g. restoration) may have positive effects for the local economy by improving the quality of the area, which may encourage more investment in the area. As such, this policy is expected to have a minor positive effect on IIA3, however this effect is uncertain as it will depend on the design and implementation of any after uses proposed.

5.66 Policy WLWP 6 supports circular economy principles and the supporting text sets out that the delivery of Circular Economy Hubs may help to facilitate this. The development of Circular Economy Hubs would result in the creation of local jobs. Therefore, this policy is expected to have minor positive effects on IIA3.

5.67 Policy WLWP 7 supports wastewater treatment capacity to be developed and existing capacity to be safeguarded and enhanced where needed. The development of sites would provide local employment opportunities and have a minor positive effect on IIA3.

IIA objective 4: Protect and improve people's health

5.68 Policy WLWP 1 requires that existing sites are safeguarded and there is adequate waste capacity within West London to manage waste produced. By ensuring adequate provision for the management of waste, this policy may reduce instances of fly tipping, which would have a minor positive effect on this IIA objective. In addition, the policy requires consideration of mitigation as part of the design of developments to ensure waste management uses would not be constrained by sensitive receptors or incompatible developments. This would help reduce adverse impacts on local amenity (e.g., visual, noise, odour etc.) including for people with locally recognised protected characteristics and those protected under the Equality Act. Therefore, minor positive effects are identified with relation to this IIA objective.

5.69 Policy WLWP 2 is expected to have minor positive effects in relation to IIA4 as it sets out that development proposals should not result in unacceptable impacts on highway safety, which would have benefits for the health and wellbeing of local people. In addition, the policy requires developments not to result in significant adverse impacts on local amenity, which would have further positive effects with relation to health and wellbeing, including for people with locally recognised protected characteristics and those protected under the Equality Act.

5.70 Policy WLWP 3 is expected to have minor positive effects in relation to IIA4 as it sets out that non-biogenic carbon emissions would be minimised, having positive effects on air quality and subsequently on human health. However, such developments may still result in some adverse effects from any non-biogenic carbon emissions that are released. Such emissions have potential to impact more sensitive groups of the local population, such as children and older people. Therefore, there is potential for mixed minor positive and minor negative effects in relation to IIA4 but these would be uncertain and depend on the location and design of the future development.

5.71 Policy WLWP 4 requires a wide range of measures to avoid adverse impacts from waste development, including effects on the health and wellbeing of local communities, including for people with locally recognised protected characteristics and those protected under the Equality Act (e.g. noise, dust, odour, and air pollution). However, the policy states that only 'unacceptable' adverse impacts on health and well-being should be avoided, offering scope for some minor adverse effects. As such, there is potential for a significant positive effect, mixed with uncertain minor adverse effects in relation to IIA4.

5.72 Policy WLWP 5 sets out that disposal of non-inert waste to land will be resisted. It strictly controls the circumstances in which proposals for disposal of non-inert waste may be allowed, including the requirement that leachate production is minimised. It also requires after uses of sites to enhance the surrounding landscape, which could have benefits for the local community. As such, an uncertain but minor positive effect is expected in relation to IIA4.

5.73 The supporting text for policy WLWP 6 supports the creation of Circular Economy Hubs, which would help create local jobs and have subsequent benefits for people's socio-economic status, health and wellbeing. In addition, the supporting text to the policy outlines that public access to services should be inclusive. As such, an uncertain but minor positive effect is expected in relation to IIA4, and may contribute to reducing inequality for people with locally recognised protected characteristics and those protected under the Equality Act.

5.74 Policy WLWP 7 does not explicitly include safeguards that would have a positive effect on this IIA objective, however, it refers to the need for new wastewater treatment infrastructure to be in accordance with Policy WLWP 4 clause B3, which requires all waste development to avoid unacceptable adverse impacts arising from air and waterborne contaminants and other emissions and other associated risks to the environment and health and wellbeing of local communities, which would include people with locally recognised protected characteristics and those protected under the Equality Act. As such, an uncertain but minor positive effect is expected in relation to IIA4.

IIA objective 5: Manage waste close to the source and promote sustainable modes of transport

5.75 Policy WLWP 1 supports the safeguarding of railheads and wharves where they are associated with a safeguarded waste site. The policy therefore supports the use of more sustainable modes of transport in the operation of waste facilities, and minimises the distance waste has to travel. The policy is therefore expected to have a minor positive effect on this objective.

5.76 Policy WLWP 2 supports the provision of additional waste management facilities subject to meeting criteria, including that the development should make use of sustainable modes of transport (e.g., rail or water) for the transportation of materials. This is expected to have minor positive effects with relation to IIA5. However, the policy also supports development in proximity to existing transport links, which may discourage the use of more sustainable modes of transport. In addition, it allows for waste from outside the plan area to be brought into the plan area to be managed. While it would be using sustainable transport it might mean waste is managed further from its source. Therefore, overall, the effects identified for IIA5 are mixed minor positive and minor negative.

5.77 Policy WLWP 3 is expected to have minor positive effects in relation to IIA5 as while the policy supports energy from waste facilities, these would mainly be in the form of facilities that incinerate waste and capture the heat to

generate electricity. This might indirectly be used to power vehicles, which is a more efficient and sustainable use of resources compared to fossil fuel.

5.78 Policy WLWP 4 promotes the use of low emission vehicles, the installation of electric vehicle charging points, and incorporates scheduling and management of vehicle routing. In addition, the policy outlines that development should demonstrate that the proximity principle has been complied with, in that the development is close to the source of waste. This would reduce the need to transport waste further distances. As such, a minor positive effect is expected in relation to IIA5.

5.79 Policy WLWP 5 would have a negligible effect on this IIA objective.

5.80 Policy WLWP 6 seeks to support the transition to a low-carbon circular economy. The policy encourages the reuse, recycling and recovery of materials which will reduce the need for new materials to be produced, and the potential transportation associated with this. In addition, the supporting text outlines that the co-location of waste uses with complementary industrial uses will be supported where it enhances resource efficiency. The policy therefore will reduce the need to transport waste, having minor positive effects in relation to IIA5.

5.81 Policy WLWP 7 outlines that proposals for the development of infrastructure for the treatment of wastewater and management of resultant sewage sludge including upgrades, will be permitted provided that there is an identified need in that location, therefore having a minor positive effect on managing waste close to the source.

IIA objective 6: Protect and enhance the historic environment

5.82 Policy WLWP 1 would have an uncertain negligible effect on this IIA objective if existing waste sites continue to operate as they currently do.

However, if any redevelopment occurs to help optimise waste management capacity in West London, then there could be impacts on the historic environment depending on the location of the safeguarded site and design of any redevelopment. While the policy itself does not require specific mitigation, potential impacts on the historic environment could be mitigated through implementation of the requirements of the relevant Local Plan and London Plan policies.

5.83 Policy WLWP 2 does not make specific reference to the historic environment, however, does require any development of sites to not result in significant adverse impacts on the environment, which would include the historic environment. Such developments may still result in some adverse effects. Therefore, there is potential for mixed minor positive and minor negative effects in relation to IIA6 but these would be uncertain and depend on the location and design of the future development.

5.84 Policy WLWP 3 would have an uncertain minor negative effect on this IIA objective, as it would depend on energy recovery proposals coming forward and the location and design of the future development.

5.85 Policy WLWP 4 does not make specific reference to the historic environment, however, it does require developments to avoid unacceptable adverse impacts and associated risks to the environment, which would include the historic environment. In addition, it requires development to be of a scale, form and character appropriate to its location, which may help protect the setting of heritage assets. The supporting text also outlines that developments will be required to conserve and avoid harm to heritage assets. This would contribute to significant positive but uncertain effects in relation to IIA6. However, the policy states that only ‘unacceptable’ adverse impacts on the environment should be avoided, offering scope for some minor adverse effects, albeit uncertain ones. Potential impacts on the historic environment could also be mitigated through implementation of the requirements of the relevant Local Plan and London Plan policies.

5.86 Policy WLWP 5 is expected to have a positive effect in relation to IIA6 as it requires the final landform, landscaping and after uses of sites must be designed to take account of and enhance the historic environment. However, this effect is mixed with a minor negative effect as landfill activities could have an adverse effect on the historic environment during operation. These effects are uncertain. While the policy itself does not require specific mitigation, potential impacts on the historic environment could be mitigated through implementation of the requirements of the relevant Local Plan and London Plan policies.

5.87 Policy WLWP 6 would have a negligible effect on this IIA objective.

5.88 Policy WLWP 7 does not make specific reference to the historic environment. However, it does require proposals for new wastewater infrastructure or upgrades to existing infrastructure to not result in significant adverse impacts on the environment, which would include the historic environment. Such developments may still result in some adverse effects. Therefore, there is potential for mixed minor positive and minor negative effects in relation to IIA6 but these would be uncertain and depend on the location and design of the future wastewater treatment infrastructure.

IIA objective 7: Protect, enhance, restore, and expand biodiversity and geodiversity assets

5.89 Policy WLWP 1 would have a negligible effect on this IIA objective if existing waste sites continue to operate as they currently do. However, if any redevelopment occurs to help optimise waste management capacity in West London, then there could be impacts on biodiversity and geodiversity depending on the location of the safeguarded site and design of any redevelopment within it, therefore the negligible effect is uncertain. While the policy itself does not require specific mitigation, potential impacts on the biodiversity and geodiversity could be mitigated through implementation of the requirements of the relevant Local Plan and London Plan policies.

5.90 Policy WLWP 2 does not make specific reference to biodiversity or geodiversity, however, does require any development of sites to not result in significant adverse impacts on the environment, which would include the biodiversity and geodiversity. Such developments may still result in some adverse effects. Therefore, there is potential for mixed minor positive and minor negative effects in relation to IIA7 but these would be uncertain and depend on the location and design of the future development. Potential impacts could be mitigated through implementation of the requirements of the relevant Local Plan and London Plan policies, and mandatory Biodiversity Net Gain requirements.

5.91 Policy WLWP 3 would have an uncertain minor negative effect on this IIA objective, as it would depend on energy recovery proposals coming forward and the location and design of the future development.

5.92 Policy WLWP 4 does not make specific reference to biodiversity, however it does require developments make a positive contribution to the local environment and avoid unacceptable adverse impacts and associated risks to the environment, which would include biodiversity and geodiversity. The supporting text outlines that development should have no significant adverse effect on local biodiversity, and opportunities to enhance biodiversity and green infrastructure should be maximised to provide ecological benefit. This would contribute to significant positive but uncertain effects in relation to IIA7. However, the policy states that only ‘unacceptable’ adverse impacts on the environment should be avoided, offering scope for some minor adverse effects, albeit uncertain ones.

5.93 Policy WLWP 5 outlines that landscaping treatment and after uses should take account of and enhance the surrounding landscape and natural environment. The supporting text outlines that inert material can be put to beneficial use in restoring mineral and landfill sites. Developing appropriate after uses and landscape treatment schemes is likely to provide new habitats, with associated benefits for biodiversity. In addition, the policy seeks to minimise leachate production from sites, which would have further benefits on biodiversity. However, the initial use of land for waste may result in land degradation if not properly managed, which may lead to negative impacts on

local biodiversity. As such, a mixed minor positive and minor negative effect is expected in relation to IIA7.

5.94 Policy WLWP 6 would have a negligible effect on this IIA objective.

5.95 Policy WLWP 7 would have a negligible effect on this IIA objective if existing wastewater treatment sites continue to operate as they currently do. However, if any redevelopment or new development occurs to help optimise wastewater treatment capacity in West London, then there could be impacts on biodiversity and geodiversity depending on the location of the site and design of any redevelopment within it. The policy does require proposals for new wastewater infrastructure or upgrades to existing infrastructure to not result in significant adverse impacts on the environment, which would include biodiversity and geodiversity. Such developments may still result in some adverse effects. Therefore, there is potential for mixed minor positive and minor negative effects in relation to IIA7 but these would be uncertain and depend on the location and design of the future wastewater treatment infrastructure.

IIA objective 8: Protect, enhance, and restore townscapes including open spaces

5.96 Policy WLWP 1 would have an uncertain negligible effect on this IIA objective if existing waste sites continue to operate as they currently do. However, if any redevelopment occurs to help optimise waste management capacity in West London, then there could be impacts on townscapes depending on the location of the safeguarded site and design of any redevelopment within it. While the policy itself does not require specific mitigation, potential impacts on the townscape and open spaces could be mitigated through implementation of the requirements of the relevant Local Plan and London Plan policies.

5.97 Policy WLWP 2 is expected to have minor positive effects in relation to townscapes and open spaces as it promotes development in industrial areas or on previously developed land. This could reduce potential for adverse effects on

landscape or townscape character and prevent the loss of open space. In addition, the policy requires developments not to result in significant adverse impacts on the environment, which would include landscape and townscape. However, development of sites may occur in other areas outside of industrial and previously developed locations. Such developments may still therefore result in some adverse effects. Therefore, there is potential for mixed minor positive and minor negative effects in relation to IIA8 but these would be uncertain and depend on the location and design of the future development.

5.98 Policy WLWP 3 would have an uncertain minor negative effect on this IIA objective, as it would depend on energy recovery proposals coming forward and the location and design of the future development.

5.99 Policy WLWP 4 does not make specific reference to townscape or open space, however it does require any new waste developments to be of a scale, form and character appropriate to its location, make a positive contribution to the local environment and avoid unacceptable adverse impacts and associated risks to the environment. This would include townscape. In addition, the policy and supporting text seeks to avoid unacceptable adverse impacts arising from visual intrusion, with the supporting text promoting green infrastructure on and around the site. Furthermore, potential impacts on the townscape could be mitigated through implementation of the requirements of the relevant Local Plan and London Plan policies. As such, significant positive but uncertain effects are expected in relation to IIA8. However, the policy states that only ‘unacceptable’ adverse impacts on the environment should be avoided, offering scope for some minor adverse effects, albeit uncertain ones.

5.100 As with IIA7, Policy WLWP 5 intends to ensure that the final landform, landscaping and after uses of sites are appropriate and enhance the surrounding landscape. However, the initial use of land for waste may result in negative effects if not properly managed, which may lead to negative impacts on local communities. As such, a mixed minor positive and minor negative effect is expected in relation to IIA8.

5.101 The supporting text to policy WLWP 6 provides support for co-locating waste uses with complementary industrial uses if it helps enhance resource efficiency. Waste development in industrial areas could reduce potential for adverse effects on landscape or townscape character elsewhere and prevent the loss of open space. Therefore, minor positive effects are expected in relation to IIA8. However, these effects are uncertain depending on where development proposals come forward.

5.102 Policy WLWP 7 would have a negligible effect on this IIA objective if existing wastewater treatment sites continue to operate as they currently do. However, if any redevelopment or new development occurs to help optimise wastewater treatment capacity in West London, then there could be impacts on townscapes depending on the location of the site and design of any redevelopment within it, The policy does require proposals for new wastewater infrastructure or upgrades to existing infrastructure to not result in significant adverse impacts on the local community and environment, which would include townscape. Such developments may still result in some adverse effects. Therefore, there is potential for mixed minor positive and minor negative effects in relation to IIA7 but these would be uncertain and depend on the location and design of the future wastewater treatment infrastructure.

IIA objective 9: Protect and enhance the quality and quantity of watercourses and water bodies and maximise the efficient use of water

5.103 Policy WLWP 1 would have an uncertain negligible effect on this IIA objective if existing waste sites continue to operate as they currently do. However, if any redevelopment occurs to help optimise waste management capacity in West London, then there could be impacts on water bodies depending on the location of the safeguarded site and design of any redevelopment within it. While the policy itself does not require specific mitigation, potential impacts on the water environment could be mitigated through implementation of the requirements of the relevant Local Plan and London Plan policies.

5.104 Policy WLWP 2 does not make specific reference to the water environment, however, does require any development of sites to not result in significant adverse impacts on the environment, which would include the water environment. Such developments may still result in some adverse effects. Therefore, there is potential for mixed minor positive and minor negative effects in relation to IIA9 but these would be uncertain and depend on the location and design of the future development.

5.105 Policy WLWP 3 would have an uncertain minor negative effect on this IIA objective, as it would depend on energy recovery proposals coming forward and the location and design of the future development.

5.106 Policy WLWP 4 does not make specific reference to the protection of water quality and resources. It does require developments make a positive contribution to the local environment and avoids unacceptable adverse impacts and associated risks to the environment, which would include the water environment. Furthermore, potential impacts on the could be mitigated through implementation of the requirements of the relevant Local Plan and London Plan policies. This would contribute to minor positive but uncertain effects in relation to IIA9. However, the policy states that only 'unacceptable' adverse impacts on the environment should be avoided, offering scope for some minor adverse effects, albeit uncertain ones.

5.107 Policy WLWP 5 includes provision for minimising the effects of existing landfill, as well as requiring after uses enhance the natural environment. The policy seeks to resist non-inert landfill in the first instance, unless it can be demonstrated that measures to minimise leachate are put in place, which would help reduce any potential water pollution. Therefore, it is considered likely that this policy would have a minor positive effect on water bodies in the long term, however this is uncertain as it would depend on the location of the landfill and appropriate after uses coming forward within the plan period. The policy also requires the resulting final landform to be designed to protect water quality. However, the potential for landfilling of non-inert waste may result in negative effects on water quality and quantity if not properly managed, as some leachate may still be released. As such, an uncertain mixed minor positive and minor negative effect is expected in relation to IIA9.

5.108 Policy WLWP 6 would have a negligible effect on this IIA objective.

5.109 Policy WLWP 7 would have an uncertain negligible effect on this IIA objective if existing wastewater treatment sites continue to operate as they currently do. The policy also requires proposals for any development to make a positive contribution to the environment, any treated effluent would only be permitted to discharge to controlled waters in accordance with a discharge consent granted by the Environment Agency to protect the quality of controlled waters. Therefore, a minor positive effect is expected in relation to IIA9.

IIA objective 10: Manage and reduce flood risk from all sources

5.110 Policy WLWP 1 would have an uncertain negligible effect on this IIA objective if existing waste sites continue to operate as they currently do. However, if any redevelopment occurs to help optimise waste management capacity in West London, then there could be impacts on surface water flooding depending on the location of the safeguarded site and design of any redevelopment within it. While the policy itself does not require specific mitigation, potential impacts on flood risk could be mitigated through implementation of the requirements of the relevant Local Plan and London Plan policies.

5.111 Policy WLWP 2 does not make specific reference to flood risk, however, does require any development of sites to not result in significant adverse impacts on the environment, which would include contribution to or risk of flooding. Such developments may still result in some adverse effects. Therefore, there is potential for mixed minor positive and minor negative effects in relation to IIA10 but these would be uncertain and depend on the location and design of the future development.

5.112 Policy WLWP 3 would have an uncertain minor negative effect on this IIA objective, as it would depend on energy recovery proposals coming forward and the location and design of the future development.

5.113 Policy WLWP 4 promotes development which is adaptable and resilient to the impacts of climate change. This is likely to include resilience to climate related events such as flooding. In addition, the supporting text encourages the delivery of green infrastructure which may help reduce flood risk. This would contribute towards better management of potential flood risk and as such, a minor positive effect is expected in relation to IIA10.

5.114 Policy WLWP 5 includes provision for minimising the effects of landfill, as well as requiring after uses that enhance the natural environment. While creating new voids in the ground could alter water courses and potentially increase risks of flooding, the supporting text recognises that inert waste lends itself for use in engineering operations such as landscaping and flood risk mitigations. As such, a mixed minor positive and minor negative effect is expected in relation to IIA9.

5.115 Policy WLWP 6 would have a negligible effect on this IIA objective.

5.116 Policy WLWP 7 would have an uncertain negligible effect on this IIA objective if existing wastewater treatment sites continue to operate as they currently do. The policy does not make specific reference to flood risk, however, does require any development of sites to deliver a positive contribution to the environment, which would include contribution to or risk of flooding. Such developments may still result in some adverse effects. Therefore, there is potential for mixed minor positive and minor negative effects in relation to IIA10 but these would be uncertain and depend on the location and design of the future development.

IIA objective 11: Minimise noise, vibration, odour, light and air pollution relating to waste development

5.117 Policy WLWP 1 requires consideration of mitigation as part of the design of developments to ensure waste management uses will not be constrained by

sensitive receptors or incompatible developments. This will help reduce adverse impacts on local amenity arising from issues such as visual intrusion, noise and odour pollution etc. Therefore, minor positive effects are identified with relation to this IIA objective.

5.118 Policy WLWP 2 does not make specific reference to minimising pollution (including noise, vibration, odour, light and air) however, does require any development of sites to not result in significant adverse impacts on the environment or local amenity, which would include release of pollution. Such developments may still result in some adverse effects with regards to pollution. Therefore, there is potential for mixed minor positive and minor negative effects in relation to IIA11 but these would be uncertain as it would be dependent on the location and design of future development.

5.119 Policy WLWP 3 supports proposals for energy from waste facilities. The policy is expected to have minor positive effects in relation to IIA11 as the policy states that release of non-biogenic carbon emissions will be minimised along with mechanisms in place for carbon capture. However, such developments may still result in some adverse effects from any non-biogenic carbon emissions that are released. Therefore, there is potential for mixed minor positive and minor negative effects in relation to IIA11 but these would be uncertain as it would be dependent on the location and design of the future development.

5.120 Policy WLWP 4 seeks to minimise adverse impacts arising from multiple sources of pollution, including those relevant to this IIA objective such as noise, vibration, odour, light and air. As such, a minor positive effect is expected in relation to IIA11.

5.121 Landfilling of waste can result in noise, vibration, odour, light and air pollution. However, Policy WLWP 5 seeks to maximise the capturing of landfill gas which would otherwise lead to air pollution if release, and also seeks to minimise the release of leachates from landfill and minimise the effects of landfill, as well as requiring after uses that are enhance the environment. As such, a mixed minor positive and minor negative effect is expected in relation to IIA11.

5.122 Policy WLWP 6 would have a negligible effect on this IIA objective.

5.123 Wastewater treatment can result in odour impacts. Policy WLWP 7 seeks to ensure that any proposals and upgrades of wastewater treatment sites are in accordance with other policies of this Plan relating to design, appropriate location and delivering a positive contribution to the environment. As such, a mixed minor positive and minor negative effect is expected in relation to IIA11 but these would be uncertain as it would be dependent on the location and design of future development.

IIA objective 12: Protect and enhance mineral resources and soils

5.124 By safeguarding existing waste sites and capacity, Policy WLWP 1 helps to reduce the need for new waste sites. This will have a minor positive effect on IIA12, due to less development of greenfield land and potential sterilisation of mineral resources.

5.125 Policy WLWP 2 is expected to have minor positive effects in relation to mineral resources and soils as it promotes development in industrial areas or on previously developed land. This could prevent the loss of greenfield land and the sterilisation of mineral resources.

5.126 Policy WLWP 3 supports proposals for waste management facilities which are capable of producing energy or fuel. It sets out that proposals must provide sufficient land to accommodate structures to facilitate implementation of local heat networks. This may result in more land being developed, which could have adverse effects on mineral and soil resources. As such, the policy is expected to have minor negative effects with relation to IIA12.

5.127 Policy WLWP 4 does not make specific reference to the protection of soil resources. However, it does require developments to make a positive contribution to the local environment and avoids unacceptable adverse impacts

and associated risks to the environment, which would include soil resources. As such, minor positive uncertain effects are expected in relation to IIA12. However, the policy states that only 'unacceptable' adverse impacts on the environment should be avoided, meaning there is scope for some minor adverse effects, albeit uncertain ones.

5.128 Policy WLWP 5 sets out that proposals for the permanent deposit of inert waste on land will be supported in principle where it is demonstrated the waste will be deposited for a beneficial purpose, which cannot be achieved in any other way. The supporting text highlights that beneficial uses could involve restoring mineral sies. As such, a minor positive effect is expected in relation to IIA12.

5.129 Policy WLWP 6 is expected to have a minor positive effect in relation to IIA12. The promotion of the circular economy encourages the reuse, recycling and recovery of materials, and as such may reduce the need for extraction of virgin materials. This will help protect mineral resources from unnecessary extraction. In addition, the supporting text notes the importance of soil management, and outlines that where relevant, a soil survey and soil management plan may be required. This will help protect soil resources.

5.130 Similarly to WLWP 1, by safeguarding existing wastewater treatment infrastructure, Policy WLWP 7 helps to reduce the need for new sites, which has a minor positive effect on IIA12, due to less development of greenfield land and potential sterilisation of mineral resources. However, Policy WLWP 7 also allows for proposals for the development of new infrastructure for the treatment of wastewater and management of resultant sewage sludge, which may result in new greenfield land being developed on. The sewage sludge may be applied to land as fertiliser though, which could have a positive effect on soil quality. As such, a mixed minor positive and negative effect is expected in relation to IIA12.

Recommendations

5.131 Although some potential minor negative effects have been identified for the WLWP policies included in the Regulation 19 plan, it is recognised that waste proposals coming forward will also need to be in conformity with the development management policies in each borough's and OPDC's Local Plans, as well as the London Plan. Therefore, in order to avoid duplicating requirements in relation to issues such as biodiversity protection and enhancement, use of green infrastructure and SuDS, protection and enhancement of the historic environment etc., the IIA does not have any further recommendations to make for the updated WLWP policies.

Equalities Impact Assessment and Health Impact Assessment

5.132 The EqIA and HIA criteria are embedded within the IIA objectives used to appraise the WLWP, and the findings for IIA objectives 3, 4 and 11 described above are particularly relevant. However, the following paragraphs summarise the overall health and equality effects of the Regulation 19 WLWP in relation to each IIA objective.

5.133 With regards to equality, the vision, strategic objectives and policies for the WLWP are likely to have a negligible effect on protected characteristics given their strategic nature, their focus on waste management issues, and as the plan does not allocate land for development. However, the WLWP does indirectly give consideration to the potential effects of waste development on specific groups (e.g. children, older people, pregnant women, disabled people, people with care experience), where there may be increased vulnerability to the effects of waste management facilities and processes, including air pollution, climate change, employment opportunities and social deprivation.

IIA objective 1: Minimise the WLWP's contribution to climate change and promote climate resilient infrastructure

5.134 Minimising emissions from waste within the WLWP area and contributing to a reduction in greenhouse gas emissions is expected to have associated positive effects on air quality, climate, water quality, material assets, soil quality and biodiversity. Similarly, reductions in greenhouse gas emissions will also avoid adverse effects on the physical and mental health of local populations, including disabled people, people with care experience, children, pregnant women and older people.

IIA objective 2: Move treatment of waste up the Waste Hierarchy

5.135 The WLWP's support for movement of waste up the waste hierarchy is expected to have a positive effect on air quality, climate, water quality, material assets, soil quality and biodiversity. Reductions in the quantities of waste and the more effective and efficient management of waste will help to avoid adverse effects on the physical and mental health of local populations, including disabled people, people with care experience, children, pregnant women and older people.

IIA objective 3: Support, maintain and enhance the development of an inclusive economy

5.136 Support for waste development within the WLWP is expected to have a positive effect on population health and inclusive economy due to creation of jobs, which could also benefit inclusion and improve opportunities and socio-economic status in more deprived areas. Investment in waste management will

also have benefits for the local economy, which will in turn have positive effects for the mental health of local populations, including disabled people, people with care experience, children, pregnant women and older people.

IIA objective 4: Protect and improve people's health

5.137 Policy requirements in the WLWP to improve and protect the local environment and sensitive receptors within it will avoid adverse effects on and have positive effects for the mental and physical health of local populations, including disabled people, people with care experience, children, pregnant women and older people.

IIA objective 5: Manage waste close to the source and promote sustainable modes of transport

5.138 Support for sustainable transport in the WLWP is expected to have a positive effect on population health, air quality, climate, material assets, water quality and biodiversity. Encouraging the use of sustainable transport of waste and for employee movements to and from facilities, and reduction in air pollution associated with the effective management of traffic associated with waste management, will avoid adverse effects and have positive effects for the mental and physical health of local populations, including disabled people, people with care experience, children, pregnant women and older people.

IIA objective 6: Protect and enhance the historic environment

5.139 The WLWP policy support for development which avoids unacceptable adverse effects on the environment (e.g. the historic environment) is expected to have potentially positive effects on the historic environment. Whilst the WLWP may potentially benefit the historic environment in terms of its aesthetic value and enjoyment by the public, it is expected to have a negligible outcome for population health and equality.

IIA objective 7: Protect, enhance, restore, and expand biodiversity and geodiversity assets

5.140 Policy requirements in the WLWP for development which avoids unacceptable adverse effects on the environment (e.g. biodiversity) is expected to have potentially positive effects on the natural environment. Measures to avoid adverse effects on the natural environment in West London could have indirect positive effects for the mental health of local populations, including disabled people, people with care experience, children, pregnant women and older people.

IIA objective 8: Protect, enhance, and restore townscapes including open spaces

5.141 The WLWP supports co-locating development with other industrial uses and on previously developed land, which is expected to have a positive effect on townscape and open spaces. Reducing development of open spaces will avoid adverse effects on and have indirect positive effects for the physical and mental health of local populations, including disabled people, people with care experience, children, pregnant women and older people.

IIA objective 9: Protect and enhance the quality and quantity of watercourses and water bodies and maximise the efficient use of water

5.142 There is support in the WLWP policies for minimising effects of waste development on the quality and quantity of watercourses and water bodies and maximising the efficient use of water, which will avoid adverse effects on and have positive effects for the physical and mental health of local populations, including disabled people, people with care experience, children, pregnant women and older people.

IIA objective 10: Manage and reduce flood risk from all sources

5.143 There is indirect support in Policy WLWP 4 for managing and reducing flood risk by requiring new waste developments to adapt and be resilient to the impacts of climate change. Reducing risk from flooding will avoid adverse effects on and have positive effects for the physical health and wellbeing of local populations, in particular disabled people, people with care experience, children, pregnant women and older people.

IIA objective 11: Minimise noise, vibration, odour, light and air pollution relating to waste development

5.144 Minimising pollution and the effects of pollution from new development is directly addressed in Policy WLWP 4 and would avoid adverse effects on physical and mental health and wellbeing of local populations, including

disabled people, people with care experience, children, pregnant women and older people.

IIA objective 12: Protect and enhance mineral resources and soils

5.145 Protecting and enhancing mineral resources and soils by promoting effective, efficient and sustainable use of land in the WLWP will have a negligible effect on physical and mental health and equality.

Chapter 6

Cumulative effects

Introduction

6.1 Cumulative effects of the Plan are considered both in terms of the plan as a whole, and in relation to other plans or development in the plan area, and potentially outside of the plan area, depending on the potential impacts.

Total effects of the WLWP

6.2 The total effects of the vision, strategic objectives and policies in the Regulation 19 WLWP in relation to each of the IIA objectives are discussed below and summarised in **Table 6.1**.

Table 6.1: Total effects of the WLWP (Regulation 19) document

IIA objectives	Total effect
IIA1: Climate change mitigation	+
IIA2: Waste hierarchy	++
IIA3: Economy	+
IIA4: Health and wellbeing	+
IIA5: Sustainable transport	+
IIA6: Historic environment	+/-?
IIA7: Biodiversity and geodiversity	+/-?
IIA8: Open spaces and townscapes	+/-?
IIA9: Water	+/-?

IIA objectives	Total effect
IIA10: Flooding	+/-?
IIA11: Noise, light and air pollution	+
IIA12: Mineral resources and Soils	+

IIA objective 1: Minimise the WLWP's contribution to climate change and promote climate resilient infrastructure

6.3 The vision, strategic objectives and policies of the WLWP have a mixture of significant and minor positive effects on this objective. This is in recognition of the WLWP's consistent focus on pursuing the sustainable location and management of waste in West London, minimising carbon emissions through on-site operations and the sustainable transportation of waste within and beyond the city. Overall, a minor positive effect is recorded for this objective.

IIA objective 2: Move treatment of waste up the Waste Hierarchy

6.4 The vision, strategic objectives and policies of the WLWP have a mixture of significant and mixed minor positive and minor negative effects on this objective. This is in recognition of the WLWP's consistent focus on moving waste up the waste hierarchy and the safeguarding of existing facilities. Therefore, overall, a significant positive effect is recorded for this objective.

IIA objective 3: Support, maintain and enhance the development of an inclusive economy

6.5 The effects of the WLWP's vision, strategic objectives and policies on IIA3 will have an overall minor positive effect. This is in recognition of the WLWP's safeguarding and optimisation of waste sites within West London and potential for redevelopment or development of new waste management facilities which would benefit the local economy with growth and job creation. The development of Circular Economy Hubs would also result in the creation of local jobs, further benefiting the local economy.

IIA objective 4: Protect and improve people's health

6.6 The effects on the WLWP's vision, strategic objectives and policies will have a mostly minor positive effect in relation to IIA4. Despite the potential for waste management activities to have some potential effects on people's health due to odour, noise or air pollutions for example, the WLWP strategic objectives and policies require a range of measures to be implemented to avoid adverse impacts from waste development on the environment including effects on health and well-being of local communities which results in the overall minor positive effect.

IIA objective 5: Manage waste close to the source and promote sustainable modes of transport

6.7 Overall, the WLWP is considered to have a minor positive effect on IIA5. The Vision and SO3 have significant positive effects on this objective. This is in recognition of their focus on pursuing the sustainable location and management

of waste in West London, minimising travel through the implementation of the proximity principle and encouraging the transportation of waste via sustainable modes. The strategic objectives also seek to reduce the distance waste has to travel by co-locating waste facilities and establishing Circular Economy Hubs. The policies safeguard existing waste sites, managing waste close to the source (i.e. residents and employees in West London) thereby reducing the need to transport waste.

IIA objective 6: Protect and enhance the historic environment

6.8 The vision and most of the objectives will have a negligible effect on the historic environment as there are no specific references to the historic environment. The policies are generally considered to have an uncertain effect on IIA 6 with a mix of positive and minor negative effects as any effects will depend on the location of any development that comes forward. The WLWP requires any new waste developments or redevelopments to be designed and operated to the highest practicable standards of environmental protection and contribute positively to the local area, which may include the historic environment. Consequently, overall the WLWP is considered to have an uncertain but mixed minor positive and minor negative effect on IIA6.

IIA objective 7: Protect, enhance, restore, and expand biodiversity and geodiversity assets

6.9 The vision, most of the objectives and some of the policies will have a negligible or uncertain negligible effect on IIA 7. Strategic objectives SO4 and SO5 have minor positive effects on IIA7 as the objectives seek to protect the environment. The policies have uncertain mixed positive and negative effects. These effects recognise the efforts of the WLWP to protect the natural environment; however, the nature of waste management means that all adverse effects on biodiversity cannot be ruled out. Consequently, overall the WLWP is

considered to have an uncertain but mixed minor positive and minor negative effect on IIA7.

IIA objective 8: Protect, enhance, and restore townscapes including open spaces

6.10 The vision, objectives and policies have a mix of effects on IIA8. They are mostly negligible or minor positive, due to the measures put in place within the WLWP to maximise the efficient use of land within West London by safeguarding existing waste uses, but also to protect environment and local amenity which should include townscapes and open space. However, the nature of waste management means that all adverse effects on open spaces and townscape cannot be ruled out. Consequently, overall the WLWP is considered to have an uncertain but mixed minor positive and minor negative effect on IIA8.

IIA objective 9: Protect and enhance the quality and quantity of watercourses and water bodies and maximise the efficient use of water

6.11 The vision and some of the objectives and policies have a negligible effect on IIA9. Where an effect was identified, the policies have mixed minor positive and minor negative effects on IIA9. These effects recognise the efforts of the WLWP to maximise the efficient use of water in waste management and protect the quality of West London's water resources; however, the nature of waste management means that all adverse effects on water quality cannot be ruled out. Consequently, overall the WLWP is considered to have an uncertain but mixed minor positive and minor negative effect on IIA9.

IIA objective 10: Manage and reduce flood risk from all sources

6.12 Some of the objectives and some of the policies have a negligible effect or an uncertain negligible effect on IIA10. Where an effect was identified, the policies have a mix of minor positive and negative effects. These effects recognise the appropriate efforts of the WLWP to reduce flood risk associated with waste management, and overall the WLWP is considered to have an uncertain but mixed minor positive and minor negative effect on IIA10.

IIA objective 11: Minimise noise, vibration, odour, light and air pollution relating to waste development

6.13 The vision, objectives and policies have a mix of minor and significant positive and minor negative effects, with some uncertainty. The effects recognise the focus in the vision and policies on avoiding and minimising pollution generated by waste management in West London. Overall, a minor positive effect is recognised overall in acknowledgement of safeguards put in place.

IIA Objective 12: Protect and enhance mineral resources and soils

6.14 The vision, objectives and policies are considered to have minor or significant positive effects on IIA12. These effects acknowledge the measures put in place within the policies to maximise the efficient use of land within West London and use waste as a resource wherever possible. Consequently, the WLWP is considered to have a minor positive effect overall.

Cumulative effects of the WLWP with other plans

6.15 Development proposed in the WLWP will not be delivered in isolation from development proposals in other plans and projects covering West London and the surrounding area. This section outlines the development proposed by nationally significant infrastructure projects, plans covering London as a whole, and the Local Plans of the neighbouring authorities which may combine with the WLWP to produce additional cumulative effects.

Nationally significant infrastructure projects

6.16 At the time of writing seven NSIP projects within London were identified on the National Infrastructure Planning website:

- Expansion of Heathrow (third runway) (Pre-application)
- North London (Electricity Line) Reinforcement (Decided)
- North London Heat and Power Project (Decided)
- Riverside Energy Park (Decided)
- Silvertown Tunnel (Decided)
- Teddington Direct River Abstraction (Pre-application)
- Thames Tideway Tunnel (Decided)

Potential for cumulative effects with Nationally Significant Infrastructure Projects

6.17 There is uncertainty around the potential cumulative effects of NSIP projects across London in relation to the WLWP, given the lack of proximity and the relatively small-scale nature of the development being managed within the

WLWP. There are potential cumulative effects in relation to NSIPs such as flood risk and water quality in the Thames; air quality, including from increased road traffic on the major arterial roads, noise and vibration; biodiversity; and landscape and visual amenity.

The London Plan and other London strategies

6.18 The London Plan 2021 provides the regional planning framework for London. The relevant plans and strategies in relation to the WLWP are set out in Chapter 3 and an expanded list is contained in Appendix A. The London Plan 2021 is currently in the process of being reviewed and the new London Plan is expected to be adopted in 2027. This may have implications for the WLWP as the policy framework evolves.

Potential for cumulative effects with the London Plan

6.19 The WLWP could result in in-combination effects with the London Plan depending on the specific location and type of development that may come forward for waste management use, and its relationship to growth areas identified in the London Plan. Given that there are no specific site allocations for new waste facilities within the WLWP, it is likely that any in-combination effects will be minimal.

6.20 The London Transport Plan is designed to deliver the transport solutions required to support development delivered through Borough Local Plans in London, while also addressing existing transport challenges and issues, including improving the public transport network, to improve use of public transport and to reduce air pollution. The small level of development likely to arise from the WLWP is likely to result in a negligible effect when combined with the large-scale projects within the London Transport Plan.

West London Local Plans and neighbouring Local Plans

6.21 Each of the boroughs within the WLWP area has an adopted local plan, or one that is under review. The main development proposed by their respective Local Plans is summarised in **Appendix C** (Baseline).

6.22 All of the local plans whether adopted or in the process of preparation, provide for both increases in housing supply as well as job creation. The increased level of development in West London and neighbouring authorities will, in combination with the WLWP, lead to increased traffic, which in turn has the potential to increase air pollution and carbon emissions. To mitigate this, the Local Plans aim to support sustainable transport modes and energy efficiency in built development. Many of the in-combination effects at the West London scale are likely to be concentrated within and around major development areas and along the strategic transport corridors. In addition, a number of the locations targeted for large-scale growth by neighbouring plans are close to the border of the plan area, increasing the potential for more localised in-combination effects. There may be localised impacts in relation to health, noise, air quality, water resources and flooding, and transport.

6.23 Although there may be increased negative cumulative effects when the WLWP is considered alongside other plans and projects, the policies within the WLWP that seek to protect the environment and local amenity could result in increased positive effects, when taken alongside similar policies in the wider development plan.

6.24 However, given the lack of allocations within the WLWP for new or improved waste facilities over the plan period, and the lack of need for additional waste management capacity, it is likely that the cumulative effect of the WLWP with other local plans will be minimal.

Habitats Regulations Assessment

6.25 The HRA was undertaken separately but the findings have been taken into account in the IIA where relevant (for example to inform judgements about the likely effects of potential development locations on biodiversity).

6.26 The first stage of HRA was to screen for likely significant effects. Following the HRA screening, likely significant effects could not be ruled out in relation to:

- **Physical damage and loss of habitat:** Richmond Park SAC (directly or via functionally linked habitats); South West London Waterbodies SPA/Ramsar (directly or via functionally linked habitats); Wimbledon Common SAC (via functionally linked habitats only). Due to the WLWP alone.
- **Non-physical disturbance:** Richmond Park SAC (directly or via functionally linked habitats); South West London Waterbodies SPA/Ramsar (directly or via functionally linked habitats); Wimbledon Common SAC (via functionally linked habitats only). Due to the WLWP alone.
- **Air pollution (dust):** Wimbledon Common SAC (direct impacts only). Due to the WLWP alone.
- **Air pollution (industrial emissions):** Burnham Beeches SAC (direct impacts on qualifying habitats); South West London Waterbodies SPA/Ramsar (indirect impacts on qualifying bird species, within Habitats Site or at functionally linked habitats); Windsor Forest & Great Park SAC (direct impacts on qualifying habitats); Wimbledon Common SAC (direct impacts on qualifying habitats). Due to the WLWP alone or in combination with other plans or projects.
- **Air pollution (vehicle emissions):** Burnham Beeches SAC (direct impacts on qualifying habitats); Richmond Park SAC (direct impacts on qualifying habitats); South West London Waterbodies SPA/Ramsar (indirect impacts on qualifying bird species, at functionally linked habitats only); Wimbledon Common SAC (direct impacts on qualifying habitats); Windsor Forest & Great Park SAC (direct impacts on qualifying habitats). Due to the WLWP alone or in combination with other plans or projects.

- **Pests and vermin:** Richmond Park SAC (directly or via functionally linked habitats); South West London Waterbodies SPA/Ramsar (directly or via functionally linked habitats); Wimbledon Common SAC (via functionally linked habitats only). Due to the WLWP alone.
- **Water quality (direct pollution):** Lee Valley SPA/Ramsar site (directly or via functionally linked habitats), Richmond Park SAC (directly or via functionally linked habitats); South West London Waterbodies SPA/Ramsar (directly or via functionally linked habitats); Wimbledon Common SAC (via functionally linked habitats). Due to the WLWP alone.
- **Water quantity (abstraction):** Lee Valley SPA/Ramsar (direct impacts only); South West London Waterbodies SPA/Ramsar (direct impacts only). Due to the WLWP alone or in combination with other plans or projects.
- **Water quality (wastewater treatment):** Lee Valley SPA/Ramsar site (direct impacts). Due to the WLWP alone or in combination with other plans or projects.

6.27 These impacts would arise from five of the WLWP's policies: WLWP 1, WLWP 2, WLWP 3, WLWP 5 and WLWP 7. However, the Appropriate Assessment concluded that, with safeguards provided by policy WLWP 4 and other policies in the WLWP, the London Plan and relevant Local Plans, as well as environmental permitting requirements, adverse effects on the integrity of Habitats Sites will be avoided.

6.28 The HRA will be published alongside the WLWP Regulation 19 consultation.

Chapter 7

Monitoring and other reporting requirements

7.1 This section sets out recommendations for indicators to monitor the effects of implementing the WLWP, taking into account monitoring indicators included within the updated Regulation 19 plan.

7.2 The SEA Regulations require that the appraisal sets out how environmental report has been taken into account in plan making.

7.3 The WLWP utilised the baseline and issues identified in the IIA Scoping Report in the preparation of the Regulation 18 WLWP. In preparing the WLWP, the waste planning authorities identified alternative policy approaches to addressing each issue, prior to drafting the policies within the Regulation 18 plan (as described in **Chapter 4**; the IIA findings are presented in **Appendix E**).

7.4 The SEA Regulations require that "the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action" and that the environmental report should provide information on "a description of the measures envisaged concerning monitoring". Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.

7.5 Although national Planning Practice Guidance states that monitoring should be focused on the significant environmental effects of implementing the Local Plan, the reason for this is to enable local planning authorities to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions. Since effects which the IIA expects to be minor may become significant and vice versa, monitoring measures have been proposed in this IIA

Report in relation to all of the IIA objectives in the IIA Framework. As the WLWP is implemented and the likely significant effects become more certain, the local planning authorities may wish to narrow down the monitoring framework to focus on those effects of the WLWP that are likely to be significantly adverse.

7.6 The remainder of this chapter sets out a number of suggested indicators for monitoring the potential sustainability effects of implementing the WLWP. The data used for monitoring in many cases will be provided by outside bodies, for example the Environment Agency. It is therefore recommended that the waste planning authorities remain in dialogue with statutory environmental consultees and other stakeholders and work with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

IIA objective 1: Minimise the WLWP's contribution to climate change and promote climate resilient infrastructure

- CO2 emissions per capita
- Total energy consumption of waste facilities
- Total energy generation from renewable and low carbon sources linked to waste facilities
- Climate change assessments submitted with applications/applications permitted
- Reduction in carbon emissions from existing/re-configurated waste sites committed to in climate change assessments
- Landfill gas production and related energy production

IIA objective 2: Move treatment of waste up the Waste Hierarchy

- Waste stream quantities
- Landfill rates

- Recycling rates
- Number of re-use facilities within the plan area

IIA objective 3: Support, maintain and enhance the development of an inclusive economy

- Unemployment rate, compared to rest of London
- Jobs generated through waste development

IIA objective 4: Protect and improve people's health

- Percentage change in life expectancy and levels of deprivation (Indices of Multiple Deprivation)
- Air quality exceedances and number of new Air Quality Management Areas declared

IIA objective 5: Manage waste close to the source and promote sustainable modes of transport

- Waste movements to and from West London
- Sustainable travel plans/number of electric vehicles cited within waste use planning applications

IIA objective 6: Protect and enhance the historic environment

- Number of entries on the Heritage at Risk Register
- Number of entries removed from the Heritage at Risk Register
- Number of waste planning applications approved contrary to Historic England and/or Conservation Officer advice

- Number of designated and non-designated heritage assets

IIA objective 7: Protect, enhance, restore, and expand biodiversity and geodiversity assets

- Net loss/gain of designated wildlife habitats
- Number and hectares of SSSIs
- Percentage of Borough's SSSI in a favourable and unfavourable condition
- Hectares of Local Nature Reserves, Local Wildlife Sites/Sites of Nature Conservation Importance, Ancient Woodland and Priority Habitats

IIA objective 8: Protect, enhance, and restore townscapes including open spaces

- Loss and gains of public open space and Local Green Space in relation to waste planning applications

IIA objective 9: Protect and enhance the quality and quantity of watercourses and water bodies and maximise the efficient use of water

- Water availability/consumption ratios
- Ecological/chemical status of water bodies
- Average commercial water consumption
- Water pollution incidents recorded by the Environment Agency

IIA objective 10: Manage and reduce flood risk from all sources

- Waste development permitted contrary to advice by the Environment Agency on flood risk
- Waste sites delivered within Flood Zones 2 and 3

IIA objective 11: Minimise noise, vibration, odour, light and air pollution relating to waste development

- Air quality exceedances and number of new Air Quality Management Areas declared
- Complaints received relating to the operations of existing waste and wastewater treatment sites

IIA objective 12: Protect and enhance mineral resources and soils

- Number of waste planning applications approved within Minerals Consultation Areas
- Percentage of new waste development on brownfield/previously developed land

Chapter 8

Conclusions and next steps

8.1 This document has considered the sustainability, environmental, health and equalities implications of the policies in the Regulation 19 WLWP. These have been subject to assessment against the IIA objectives developed at the scoping stage of the IIA process.

8.2 Overall, the Regulation 19 WLWP was found to have a range of minor positive and significant positive effects in relation to all of the IIA objectives, although a number of potential minor negative effects were also identified. No significant negative effects were identified for the Regulation 19 WLWP. Many of the effects are mixed, reflecting that the plan area has sufficient waste management capacity over the plan period, therefore the effects will depend on if and where any new development or redevelopment within safeguarded sites are proposed, and the specific features and design of any new facility proposed. There are a number of safeguarding criteria included within the policies (in particular Policy WLWP 2 and Policy WLWP 4), which combined with other development management policies found in the Boroughs' and OPDC's Local Plans should help to minimise any adverse effects of new or redeveloped waste sites.

8.3 In considering the cumulative effects of all of the WLWP vision, objectives and policies, the IIA found that:

- Significant positive effects are expected in relation to IIA objective 2: Waste hierarchy.
- Minor positive effects are expected in relation to IIA objective 1: Climate change mitigation, IIA objective 3: Economy, IIA objective 4: Health and wellbeing, IIA objective 5: Sustainable transport, IIA objective 11: Noise, light and air pollution and IIA objective IIA12: Mineral resources and soils.
- Uncertain mixed minor positive and minor negative effects are expected in relation to IIA objective 6: Historic environment, IIA objective 7:

Biodiversity and geodiversity, IIA objective 8: Open spaces and townscapes, IIA objective 9: Water and IIA objective 10: Flooding primarily due to the uncertainty around location, type and design of future waste development that might get proposed in West London.

8.4 No significant negative effects were identified for the Regulation 19 WLWP.

Next steps

8.5 This IIA Report will be available for consultation alongside the WLWP (Regulation 19) document in Summer/Autumn 2026. This consultation is on the version of the WLWP that the Boroughs' and OPDC propose to submit to the Secretary of State for examination.

8.6 Following the above periods of public consultation, the WLWP will be independently examined by a Planning Inspector appointed by the Secretary of State, who will consider its content and any objections to it, and reach a decision on its overall 'soundness' before it can proceed to be adopted. Once the plan is adopted it will form part of the development plan for West London.

LUC
May 2026

Appendix A

Review of relevant plans, policies and programmes

International

IPCC's Sixth Assessment Report on Climate Change (IPCC, 2022)

Key objectives relevant to the WLWP

- To limit and/or reduce all greenhouse gas emissions which contribute to climate change.

Key targets and indicators relevant to the WLWP

- None.

Implications for the WLWP

- Plan should support reduction in emissions of greenhouse gases.

Implications for the IIA

- Include sustainability objectives to support reduction in emissions of greenhouse gases.

Johannesburg Declaration on Sustainable Development (2002)

Key objectives relevant to the WLWP

- Commitment to building a humane, equitable and caring global society aware of the need for human dignity for all.
- Areas of focus include:
  - Sustainable consumption and production patterns.
  - Accelerate shift towards sustainable consumption and production – 10-year framework of programmed of action.
  - Reverse trend in loss of natural resources.
  - Renewable energy and energy efficiency.
  - Urgently and substantially increase Global share of renewable energy.
  - Significantly reduce the rate of biodiversity loss by 2010.

Key targets and indicators relevant to the WLWP

- To promote greater resource efficiency, increase energy efficiency and develop new technology for renewable energy.

Implications for the WLWP

- Allocate sites and develop policies that take account of the Declaration.

Implications for the IIA

- Include sustainability objectives to enhance the natural environment and promote renewable energy and energy/resource efficiency.

Aarhus Convention (1998)

Key objectives relevant to the WLWP

- Established a number of rights of the public with regard to the environment.
- Local authorities should provide for:
  - The right of everyone to receive environmental information.
  - The right to participate from an early stage in environmental decision making.
  - The right to challenge in a court of law public decisions that have been made without respecting the two rights above or environmental law in general.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Allocate sites and develop policies that take account of the Convention.

Implications for the IIA

- Ensure that the public are involved and consulted at all relevant stages of IIA production.

Bern Convention (1979)

Key objectives relevant to the WLWP

- The Convention on the Conservation of European Wildlife and Natural Habitats (the Bern Convention) was adopted in Bern, Switzerland in 1979, and came into force in 1982.
- The principal aims of the Convention are to ensure conservation and protection of wild plant and animal species and their natural habitats (listed in Appendices I and II of the Convention), to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species) listed in Appendix III.
- To this end the Convention imposes legal obligations on contracting parties, protecting over 500 wild plant species and more than 1,000 wild animal species.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Allocate sites and develop policies that take account of the Convention.

Implications for the IIA

- Include sustainability objectives to protect and enhance biodiversity.

Ramsar Convention – Convention on Wetlands of International Importance (1971)

Key objectives relevant to the WLWP

- To promote the conservation and wise use of all wetlands through local, regional and national actions and international co-operation, as a contribution towards achieving sustainable development throughout the world.

Key targets and indicators relevant to the WLWP

- The number of Ramsar sites being designated in the UK.

Implications for the WLWP

- Plan should promote the conservation and make wise use of all wetland areas.

Implications for the IIA

- Consider inclusion of objectives which aim to promote conservation and wise use of wetland areas.

UN Paris Climate Change Agreement (2015)

Key objectives relevant to the WLWP

- International agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Allocate sites and develop policies that take account of the Agreement.

Implications for the IIA

- Consider climate change.

Water Framework Directive (2017)

Key objectives relevant to the WLWP

- Achieve good chemical and ecological status for all inland and coastal waters.
- Reduce water pollution.
- Prevent deterioration of aquatic ecosystems.
- Promote sustainable water use and reduce pollution from urban, agricultural, and industrial sources.

Key targets and indicators relevant to the WLWP

- To achieve at least good surface water status for all surface water bodies and good chemical status in groundwater bodies.

Implications for the WLWP

- Ensure waste planning and site development avoids negative effects on water quality.
- Regulation 33 of the Water Framework Directive Regulations places a legal duty on councils to have regard to River Basin Management Plans when exercising their functions. For the WLWP area, this duty applies in relation to the Thames River Basin Management Plan. Under this duty, councils must ensure there is no deterioration in the ecological status of any WFD water body or its associated elements, and should seek to support their enhancement where possible. These responsibilities are reinforced in the London Plan (Policy SI 5D1, p.356), which requires boroughs to protect and enhance the water environment.

Implications for the IIA

- Include objectives related to maintaining and improving water status.

IUCN (2020) Nature-Based Solutions Global Standard

Key objectives relevant to the WLWP

- Promote use of nature-based solutions (NbS) to address societal challenges including climate change, biodiversity loss, water security, and disaster risk.

Key targets and indicators relevant to the WLWP

- Water security.

Implications for the WLWP

- Integrate green infrastructure and ecosystem-based approaches in waste site design.

Implications for the IIA

- Include sustainability objectives that encourage NbS approaches to flood risk, biodiversity, and resilience.

The Glasgow Pact (UN Framework Convention on Climate Change, 2021)

Key objectives relevant to the WLWP

- Accelerate action to limit climate change within the decade and limit global temperature rise to 1.5 degrees Celsius above pre-industrial levels.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Allocate sites and develop policies that take account of the Agreement.

Implications for the IIA

- Consider climate change.

National

NPPF (2024)

Key objectives relevant to the WLWP

- Economic objective:
  - To help build a strong, responsive and competitive economy
  - By ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity
  - By identifying and coordinating the provision of infrastructure.
- Social objective:
  - To support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations
  - By fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.
- Environmental objective:
  - To protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution
  - Mitigating and adapting to climate change, including moving to a low carbon economy.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Economic objective:
  - Plan should make adequate provision for waste management infrastructure to ensure the growth of the waste economy.
- Social objective:
  - Plan should include policies and objectives to promote a circular economy and the delivery of green infrastructure, enhanced public rights of way or improved access to recreation as part of the development and restoration of waste sites.
- Environmental objective:
  - Plan should include policies and objectives to address the causes and impacts of climate change relating to waste development activity, including using opportunities arising from waste operations and reclamation activity to mitigate and adapt to climate change and to leave a positive legacy.
- Paragraph 162 states that plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.

Implications for the IIA

- Economic objective:
  - Include a sustainability objective relating to strengthening the economy.
- Social objective:
  - Include a sustainability objective relating to health and well-being.
- Environmental objective:
  - Include a sustainability objective relating to climate change mitigation and adaptation, conservation of historic features, conservation and enhancement of the natural environment.

Consultation draft NPPF (2025)

- In December 2025, the Government published a consultation on proposed updates to the NPPF. This version of NPPF will be subject to consultation until March 2026 and may be subject to change in response to comments received.

Key objectives relevant to the WLWP

- Economic objective
  - Build a strong and effective economy
  - By providing conditions for long term economic growth, when allocating sites, plans should avoid overly prescriptive requirements on acceptable uses and enable flexibility to respond to changing commercial properties.
  - By providing industrial strategy zones
- Social objective
  - Plan for healthier communities by providing direction on community facilities and public sector infrastructure.
  - By providing standards for provision of outdoor recreational land and provide explicit use of facilities to support health and wellbeing. Improve the quality of life and ensure appropriate contributions from development are secured.
  - Designed areas of green space should be close to the communities they serve.
- Environmental objective
  - Conserve and enhance the historic and natural environment.
  - Include Local Nature Recovery Strategies and use environmental evidence to highlight areas that need safeguarding.

- Set clear standards for green infrastructure and apply BNG in a proportionate manner across local authorities.
- Waste plans are to be implemented for sustainable waste strategies.
- Plans are set out on how to address current or future climate change vulnerabilities and to encourage opportunities for green infrastructure and nature-based solutions.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Economic objective:
  - Adequate provision for waste management infrastructure should be made to ensure the growth of the waste economy and support the wider economy in long term economic growth.
- Social objective:
  - Plan should include policies and objectives that promote the delivery of green infrastructure, enhanced public rights of way or improved access to recreation as part of the development and restoration of waste sites. The design of waste facilities should accommodate for the impacts on human health.
- Environmental objective:
  - Plan should include policies and objectives to address the issues relating to climate change from waste development activity, including using opportunities arising from waste operations and reclamation activity including opportunities for green infrastructure.

Implications for the IIA

- Economic objective:
  - Include a sustainability objective relating to strengthening the economy in the long term.
- Social objective:
  - Include a sustainability objective relating to health and well-being.
- Environmental objective:
  - Include a sustainability objective relating to climate change mitigation and adaptation, conservation of historic features, conservation and enhancement of the natural environment.

NPPW (2014)

Key objectives relevant to the WLWP

- The National Planning Policy for Waste was adopted in October 2014 and sets out the need for local authorities to:
  - Prepare local plans using a robust proportionate evidence base
  - Identify need for waste management facilities
  - Identify suitable sites and areas
  - Determine planning applications
  - Monitor and report
  - Take up in allocated sites and areas
  - Existing stock and changes in the stock of waste management facilities.
  - The amount of waste recycled, recovered or going for disposal

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Allocate sites and develop policies that take account of the National Planning Policy for Waste.

Implications for the IIA

- Include a sustainability objective relating to sustainable waste management.

DEFRA (2021): National Waste Management Plan for England

Key objectives relevant to the WLWP

- Provides an analysis of the current waste management situation in England and evaluates how it will support implementation of the objectives and provisions of the revised Waste Framework Directive.
- At the local authority level, the Waste Management Plan notes that waste planning authorities (county and unitary authorities in England) are responsible for producing local waste management plans that cover the land use planning aspect of waste management for their areas.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Allocate sites and develop policies that take account of the National Waste Management Plan.

Implications for the IIA

- Include a sustainability objective relating to sustainable waste management.

DCLG (2015): Planning Practice Guidance on Waste

Key objectives relevant to the WLWP

- Provides further information in support of the implementation of waste planning policy.
- At the local authority level, the Guidance outlines who is responsible for waste developments and which matters come within the scope of 'waste development'.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Allocate sites and develop policies that take account of the Planning Practice Guidance on Waste.

Implications for the IIA

- Include a sustainability objective relating to sustainable waste management.

MHCLG Planning Practice Guidance (2021)

Key objectives relevant to the WLWP

- The PPG documents provide guidance on the interpretation and implementation of the NPPF.
- Of particular relevance are:
  - Planning Practice Guidance on waste
  - Planning Practice Guidance on air quality
  - Planning Practice Guidance on climate change
  - Planning Practice Guidance on conserving and enhancing the historic environment
  - Planning Practice Guidance on ensuring the vitality of town centre
  - Planning Practice Guidance on flood risk and coastal change
  - Planning Practice Guidance on health and wellbeing
  - Planning Practice Guidance on local plans
  - Planning Practice Guidance on the natural environment
  - Planning Practice Guidance on noise
  - Planning Practice Guidance on light pollution
  - Planning Practice Guidance on open space, sports and recreation facilities, public rights of way and local green space
  - Planning Practice Guidance on rural housing

- Planning Practice Guidance on renewable and low carbon energy
- Planning Practice Guidance on water supply, wastewater and water quality

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Plan needs to be produced in accordance with the guidance outline in the NPPG.

Implications for the IIA

- The SA should be prepared in line with the NPPG.

DEFRA (2012): National Policy Statement for Waste Water

Key objectives relevant to the WLWP

- Sets out the proposed policy framework to inform planning decisions on applications for large waste water infrastructure projects.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Allocate sites and develop policies that take account of the National Policy Statement for Waste Water.

Implications for the IIA

- Include IIA objectives that relate to sustainable waste management and the protection of water quality.

DEFRA (2013): National Policy Statement for Hazardous Waste

Key objectives relevant to the WLWP

- Sets out the strategic need and justification of Government policy for the provision of national significant infrastructure for the management of hazardous waste.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Allocate sites and develop policies that take account of the National Policy Statement for Hazardous Waste.

Implications for the IIA

- Include IIA objectives that relate to sustainable waste management which will include hazardous waste.

HM Government (2013) Waste prevention programme for England: Prevention is better than cure – The role of waste prevention in moving to a more resource efficient economy

Key objectives relevant to the WLWP

- The aim of the Programme is to:
  - Improve the environment and protect human health by supporting a resource efficient economy, reducing the quantity and impact of waste produced whilst promoting sustainable economic growth.
  - Encourage businesses to contribute to a more sustainable economy by building waste reduction into design, offering alternative business models and delivering new and improved products and services.
  - Encourage a culture of valuing resources by making it easier for people and businesses to find out how to reduce their waste, to use products for longer, repair broken items, and enable reuse of items by others.
  - Help businesses recognise and act upon potential savings through better resource efficiency and preventing waste, to realise opportunities for growth.
  - Support action by central and local government, businesses and civil society to capitalise on these opportunities.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Policies should take account of the strategic measures in the Programme.

Implications for the IIA

- Include IIA objectives which seek to promote waste prevention.

HM Government (2009): The UK Low Carbon Transition Plan

Key objectives relevant to the WLWP

- The Plan plots how the UK will meet the 34 percent cut in emissions on 1990 levels by 2020.
- The Plan shows how reductions in the power sector and heavy industry; transport; homes and communities; workplaces and jobs; and farming, land and waste sectors could enable carbon budgets to 2022 to be met.

Key targets and indicators relevant to the WLWP

- The plan includes a 5-point Action Plan covering the following areas:
  - Protecting the public from immediate risk;
  - Preparing for the future;
  - Limiting the severity of future climate change through a new international climate agreement;

- Building a low carbon UK;
- Supporting individuals, communities and businesses to play their part.

Implications for the WLWP

- Plan should include policies that contribute towards achieving lower carbon emissions.

Implications for the IIA

- Objectives should reflect the aims set in the UK Low Carbon Transition Plan to reduce carbon emissions.

HM Government (2011): The Carbon Plan: Delivering our low carbon future

Key objectives relevant to the WLWP

- The Carbon Plan is a Government wide plan of action on climate change, including domestic and international activity.

Key targets and indicators relevant to the WLWP

- The plan includes a range of sectorial plans and targets including low carbon industry.

Implications for the WLWP

- Plan should include policies that contribute towards achieving lower carbon emissions such as:

- Diverting waste from landfill by driving it up the waste hierarchy.
- Using alternate or low emission transport options where viable.

Implications for the IIA

- Include a sustainability objective relating to reducing carbon emissions.

DECC (2009): The UK Renewable Energy Strategy

Key objectives relevant to the WLWP

- Increase our use of renewable electricity, heat and transport, and help tackle climate change.
- Build the UK low-carbon economy, promote energy security and take action against climate change.

Key targets and indicators relevant to the WLWP

- 15% of energy from renewable sources by 2020.
- Reducing UK CO2 emissions by 750 million tonnes by 2030.

Implications for the WLWP

- Ensure that site allocations and policies will support renewable energy provision including electricity, heat and transport.

Implications for the IIA

- Include a sustainability objective relating to increasing energy provided from renewable sources.

HM Government (2017) The Clean Growth Strategy

Key objectives relevant to the WLWP

- Under the Climate Change Act, the Government is required to publish a set of policies and proposals that will enable the legally-binding carbon budgets, on track to the 2050 target, to be met.
- The Clean Growth Strategy sets out a range of policies and proposals, as well as possible long-term pathways for UK emissions in two ways – by decreasing emissions and by increasing economic growth.

Key targets and indicators relevant to the WLWP

- The strategy covers the fourth and fifth carbon budgets, spanning 2023-2027 and 2028-2032, by when the UK must cut its greenhouse gas emissions to 57% below 1990 levels.

Implications for the WLWP

- Plan should support renewable energy provision including electricity, heat and transport.

Implications for the IIA

- Include a sustainability objective relating to promoting energy efficiency and the use of appropriate renewable or lower carbon energy sources on site.

DEFRA (2018): The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting– Making the Country Resilient to a Changing Climate

Key objectives relevant to the WLWP

- The report sets out visions for the following sectors:
  - People and the Built Environment – “to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change on buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to address the risks and make the most of the opportunities of a changing climate.”
  - Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate”.
  - Natural Environment – “the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides.”
  - Business and Industry – “UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change.”

- Local Government – “Local government plays a central role in leading and supporting local places to become more resilient to a range of future risks and to be prepared for the opportunities from a changing climate.”

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Policies should take account of the aims of the Programme.

Implications for the IIA

- Include IIA objectives which seek to promote the implementation of adaptation measures to make the area more resilient to a changing climate.

DEFRA (2017): Groundwater Protection

Key objectives relevant to the WLWP

- To prevent pollution of groundwater.

Key targets and indicators relevant to the WLWP

- To meet Water Framework Directive requirements for groundwater quality.

Implications for the WLWP

- Plan should recognise the importance and vulnerability of groundwater resources and ensure that they are not detrimentally affected by waste development.

Implications for the IIA

- Include an objective to protect groundwater quality.

Environment Agency (2022): The National Flood and Coastal Erosion Risk Management Strategy for England

Key objectives relevant to the WLWP

- This Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities.
- The strategic aims and objectives of the Strategy are to:
  - “manage the risk to people and their property;
  - Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national;
  - Achieve environmental, social and economic benefits, consistent with the principles of sustainable development”.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Policies should seek to reduce and manage the risk of all types of flooding.

Implications for the IIA

- The IIA framework should include objectives which seek to reduce the risk and manage flooding sustainably.

DEFRA (2009) Safeguarding our Soils: A Strategy for England

Key objectives relevant to the WLWP

- The vision is “by 2030, all England’s soils will be managed sustainability and degradation threats tackled successfully. This will improve the quality of England’s soils and safeguard their ability to provide essential services for future generations”.
- The Strategy highlights the areas for priority including:
  - Better protection for agricultural soils.
  - Protecting and enhancing stores of soil carbon.
  - Building the resilience of soils to a changing climate.
  - Preventing soil pollution.
  - Effective soil protection during construction and development.
  - Dealing with our legacy of contaminated land.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Ensure that site allocations and policies will help protect and enhance the quality of soils and seek to sustainably manage their quality for future generations.

Implications for the IIA

- Include IIA objective which seeks to safeguard and enhance the quality of soil.

DEFRA (2007): The Air Quality Strategy for England, Scotland, Wales and Northern Ireland

Key objectives relevant to the WLWP

- Make sure that everyone can enjoy a level of ambient air quality in public spaces, which poses no significant risk to health or quality of life.
- Render polluting emissions harmless.

Key targets and indicators relevant to the WLWP

- Sets air quality standards for 13 air pollutants.

Implications for the WLWP

- Develop policies that aim to meet the standards.

Implications for the IIA

- Include sustainability objectives to reduce pollution and protect and improve air quality.

DEFRA Clean Air Strategy 2019

Key objectives relevant to the WLWP

- The Clean Air Strategy 2019 sets out actions to improve air quality by reducing pollution from a wide range of sources. The Clean Air Strategy informs the detailed National Air Pollution Control Programme.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Ensure that site allocations and policies will contribute to maintaining and improving air quality.

Implications for the IIA

- Include sustainability objectives to protect and improve air quality.

DEFRA and DfT (2017): UK plan for tackling roadside nitrogen dioxide concentrations

Key objectives relevant to the WLWP

- The strategy aims to help local authorities by setting up a £225 million implementation fund, establishing a clear air fund and £100 million for retrofitting and new low emission buses.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Ensure that site allocations and policies will contribute to maintaining and improving air quality.

Implications for the IIA

- Include sustainability objectives to protect and improve air quality.

DEFRA (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services

Key objectives relevant to the WLWP

- The strategy aims to guide conservation efforts in England up to 2020 and move from a net biodiversity loss to gain. The strategy includes 22 priorities which include actions for the following sectors:

- Agriculture;
- Forestry;
- Planning and Development;
- Water Management;
- Marine Management;
- Fisheries;
- Air Pollution; and
- Invasive Non-Native Species.

Key targets and indicators relevant to the WLWP

- The strategy develops ambitious yet achievable goals for 2020 and 2050, based on Aichi Targets set at the Nagoya UN Biodiversity Summit in October 2010.

Implications for the WLWP

- Develop policies that promote conservation and enhancements of biodiversity and ensure that site allocations take account of the aims of the strategy.

Implications for the IIA

- Include sustainability objective that relates to biodiversity.

DEFRA (2011): Securing the Future: Delivering UK Sustainable Development Strategy

Key objectives relevant to the WLWP

- Enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life for future generations.
- There are 4 shared priorities:
  - sustainable consumption and production;
  - climate change and energy;
  - natural resource protection and environmental enhancement; and
  - sustainable communities.

Key targets and indicators relevant to the WLWP

- Sets out indicators to give an overview of sustainable development and priority areas in the UK.
- They include 20 of the UK Framework indicators and a further 48 indicators related to the priority areas.

Implications for the WLWP

- Ensure that site allocations and policies meet the aims of the Sustainable Development Strategy.

Implications for the IIA

- Include sustainability objectives to cover the Strategy's shared priorities.

DoH (2010): Healthy Lives, Healthy People: our Strategy for public health in England

Key objectives relevant to the WLWP

- Protect the population from serious health threats; helping people live longer, healthier and more fulfilling lives; and improving the health of the poorest, fastest.
- Prioritise public health funding from within the overall NHS budget.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Ensure that site allocations and policies reflect the objectives of the strategy.

Implications for the IIA

- Include a sustainability objective relating to health and well-being.

DECC (2014): Community Energy Strategy

Key objectives relevant to the WLWP

- Sets out plans to promote and facilitate the planning and development of decentralised community energy initiatives in four main types of energy activity:

- Generating energy (electricity or heat)
- Reducing energy use (saving energy through energy efficiency and behaviour change)
- Managing energy (balancing supply and demand)
- Purchasing energy (collective purchasing or switching to save money on energy)

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Ensure that site allocations and policies will support community low carbon and renewable energy provision including electricity, heat and transport.

Implications for the IIA

- Include a sustainability objective relating to increasing energy provided from decentralised low carbon and renewable sources.

HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment

Key objectives relevant to the WLWP

- The 25 Year Environment Plan sets out government action to tackle a wide range of environmental pressures.
- The 25 Year Environment Plan identifies six areas around which action will be focused. These include:

- Using and managing land sustainably.
- Recovering nature and enhancing the beauty of landscapes.
- Connecting people with the environment to improve health and wellbeing.
- Increasing resource efficiency and reducing pollution and waste.
- Securing clean, productive and biologically diverse seas and oceans.
- Protecting and improving the global environment.

Key targets and indicators relevant to the WLWP

- The 25 Year Environment sets out ambitious goals to manage pressures on the environment in the UK, based on England's 159 National Character Areas and monitoring indicators.

Implications for the WLWP

- Develop policies that promote conservation and enhancements of the natural environment and ensure that site allocations take account of the goals of the Environment Plan.

Implications for the IIA

- Include sustainability objective that relates to the protection of the natural environment.

HM Government (2018) Our Waste, Our Resources: A strategy for England

Key objectives relevant to the WLWP

- The Strategy sets out how the Government will preserve stocks of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy.
- The strategy is framed by natural capital thinking and guided by two overarching objectives:
  - To maximise the value of resource use; and;
  - To minimise waste and its impact on the environment.

Key targets and indicators relevant to the WLWP

- The Strategy seeks to contribute to the delivery of five strategic ambitions:
  - To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025;
  - To work towards eliminating food waste to landfill by 2030;
  - To eliminate avoidable15 plastic waste over the lifetime of the 25 Year Environment Plan;
  - To double resource productivity by 2050; and
  - To eliminate avoidable waste of all kinds by 2050.

Implications for the WLWP

- Develop policies that promote conservation and enhancements of the natural environment and ensure that site allocations take account of the goals of the Strategy.

Implications for the IIA

- Include sustainability objective that relates to the efficient use of resources.

British Energy Security Strategy (2022)

Key objectives relevant to the WLWP

- The Strategy sets out long-term targets for offshore wind, solar, hydrogen, and nuclear energy following the onset of conflict in Ukraine.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Ensure that site allocations and policies will support community low carbon and renewable energy provision.

Implications for the IIA

- Include sustainability objective that relates to renewable energy.

DLHC (2022) Flood risk and coastal guidance

Key objectives relevant to the WLWP

- This report advises how to take account of and address the risks associated with flooding and coastal change in the planning process.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Ensure that site allocations and policies will mitigate against flood risk.
- Recognise that certain waste developments (e.g. landfill and hazardous waste) are classified as 'more vulnerable' and subject to flood zone constraints. More vulnerable developments are appropriate in Flood Zones 1 and 2, under Annex 3 of the NPPF these developments are only appropriate in flood zone 3a if the exception test is passed.

Implications for the IIA

- Include sustainability objective that relates to mitigating and managing flood risk.

Thames river basin district river basin management plan: updated 2022

Key objectives relevant to the WLWP

- To protect and enhance the water environment, including rivers, lakes, estuaries, coastal waters, and groundwater.
- To prevent deterioration of water bodies and improve their ecological and chemical status.
- To promote sustainable water use and reduce pollution from all sectors, including waste management.
- To contribute to climate change adaptation and resilience of the water environment.

Key targets and indicators relevant to the WLWP

- Achieve good ecological and chemical status for all water bodies
- Reduce pollution from urban runoff and waste-related discharges.
- Measures required to manage pollution from wastewater, towns, cities and transport:
  - Pollution control initiatives.
  - Mitigate/remediate point source impacts on receptors.
  - Reduce point source pollution at source.
  - Reduce point source pollution pathways (includes controlling entry to the water environment).
  - Reduce diffuse pollution at source.

Implications for the WLWP

- Ensure policies and site allocations prevent deterioration of water bodies and assist in achieving "good" ecological and chemical status.
- Promote development that reduces water pollution, manages runoff, and adapts to climate pressures.
- Integrate catchment-based approaches in waste facility planning

Implications for the IIA

- Add objectives on improving water quality, reducing pollution, and resilience.

National Framework for Water Resources: Water for Growth, Nature and a Resilient Future (2025)

Key objectives relevant to the WLWP

- Ensure resilient long-term water supplies for all users while leaving the environment in a better state.
- Improve the nation's resilience to drought and minimise interruptions to water supplies.

Key targets and indicators relevant to the WLWP

- Meet industry's target to reduce leakage by 50% by 2050.

Implications for the WLWP

- Policies should support efficient water use, reductions in water demand, and avoid placing additional pressure on already constrained water resources.

Implications for the IIA

- Include sustainability objectives on reducing water consumption, increasing resilience to drought, and avoiding harm to water resources or water bodies.

UK Marine Policy Statement (2011, updated 2020)

Key objectives relevant to the WLWP

- The UK vision for the marine environment is for 'clean, healthy, safe, productive and biologically diverse oceans and seas'.

Implications for the Waste Local Plan

- Consideration of policy and site allocations in relation to potential impact on water environment from discharge activities.

Implications for the IIA

- Inclusion of objectives and site assessment criteria in relation to protection of water quality in rivers (and their marine receiving environments)

South East Marine Plan (2011, updated 2020)

Key objectives relevant to the WLWP

- To enhance and protect the marine environment and achieve sustainable economic growth while respecting local communities both within and adjacent to the marine plan area.

Implications for the Waste Local Plan

- Consideration of policy and site allocations in relation to potential impact on water and marine environment from discharge activities.

Implications for the IIA

- Inclusion of objectives and site assessment criteria in relation to protection of water quality in rivers (and their marine receiving environments)

DEFRA, Biodiversity Net Gain (BNG)

Key objectives relevant to the Waste Local Plan

- Ensure that development leaves biodiversity in a measurably better state than before.

Key targets and indicators relevant to the Waste Local Plan

- Mandatory 10% net gain in biodiversity units for new developments (from late 2023).

Implications for the Waste Local Plan

- Ensure that site allocations and policies consider biodiversity enhancement opportunities.
- Require BNG assessments for new waste facilities and infrastructure.

Implications for the IIA

- Include sustainability objectives that reflect biodiversity net gain requirements

Healthy Homes — a foundation for healthier and resilient communities (2025)

Key objectives relevant to the WLWP

- The delivery of new homes to provide the aim of improving physical health, mental wellbeing, accessibility, climate resilience, and long-term sustainability. Homes should reduce preventable health risks.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Ensure that site allocations and policies reflect the objectives of the strategy and do not cause detriment to human health.

Implications for the IIA

- Include a sustainability objective relating to health and well-being

Planning and Infrastructure Act (UK) (2025)

Key objectives relevant to the WLWP

- Support the clean power 2030 target and prioritise infrastructure and clean energy alongside housing.

- Implementation of the Nature Restoration Levy administered by Natural England. Developers can contribute financially to strategic nature recovery rather than site-by-site mitigation.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Ensure that site allocations and policies reflect the objectives of the strategy.

Implications for the IIA

- Include a sustainability objective relating to climate change and ecology.

Carbon Budget and Growth Delivery Plan (2025)

Key objectives relevant to the WLWP

- Integrates emission reduction with economic growth, energy security and job creation.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Ensure that site allocations and policies reflect the objectives of the strategy.

Implications for the IIA

- Include a sustainability objective relating to climate change and economic growth.

DEFRA, Environmental Improvement Plan (2025)

Key objectives relevant to the WLWP

- Covers how environmental targets will be met over the next 15 years to restore nature, build a circular economy, protect environmental security, improve access to nature and improve environmental quality.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Ensure that site allocations and policies reflect the objectives of the strategy.

Implications for the IIA

- Include a sustainability objective relating to supporting ecology and the natural environment.

National Assessment of Flood and Coastal Erosion Risk in England (2025) ('NaFRA 2')

Key objectives relevant to the WLWP

- Provides a detailed understanding of current and future flood and coastal erosion risk. It looks into surface water, rivers, the sea ad climate change to inform planning, investment and long-term adaptation.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Policies and site allocations should seek to reduce and manage the risk of all types of flooding.

Implications for the IIA

- The IIA framework should include objectives which seek to reduce the risk and manage flooding sustainably.

UK Infrastructure: A 10 Year Strategy (2025)

Key objectives relevant to the WLWP

- Provides a long term plan for economic, housing and social infrastructure as part of the UK Governments growth mission.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Policies and site allocations should reflect the objectives of the strategy.

Implications for the IIA

- The IIA framework should include objectives which seek to meet economic and social objectives.

The UK's Modern Industrial Strategy (2025)

Key objectives relevant to the WLWP

- Provides a strategy over 10 year to increase business investment, grow the industries of the future and deliver sustained economic growth as part of the Plan for Change (2024) strategy.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Policies and site allocations should reflect the objectives of the strategy.

Implications for the IIA

- The IIA framework should include objectives which seek to meet economic and social objectives.

Historic England Corporate Plan 2023–26 (2023)

Key objectives relevant to the WLWP

- To improve peoples lives by protecting and preserving the historic environment.
- To connect people with the historic environment and educate for future generations.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Policies and site allocations should reflect the objectives of the strategy.

Implications for the IIA

- The IIA framework should include objectives which seek to meet historic environment objectives.

Heritage Statement (2017)

Key objectives relevant to the WLWP

- Sets out how the Government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Policies and site allocations should reflect the objectives of the strategy.

Implications for the IIA

- The IIA framework should include objectives which seek to meet historic environment objectives.

A.1

Sustainability Appraisal and Strategy Environmental Assessment Historic England Advice Note 8 (2016)

Key objectives relevant to the WLWP

- Sets out requirements for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Policies and site allocations should reflect the objectives of the strategy.

Implications for the IIA

- The IIA framework should include objectives which seek to meet historic environment objectives.

Planning (Listed Buildings and Conservation Areas) Act (1990)

Key objectives relevant to the WLWP

- An Act of Parliament that changed the laws for granting of planning permission for building works, with a particular focus on listed buildings and conservation areas.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Policies and site allocations should reflect the objectives of the strategy.

Implications for the IIA

- The IIA framework should include objectives which seek to meet historic environment objectives.

Ancient Monuments and Archaeological Areas Act (1979)

Key objectives relevant to the WLWP

- A law passed by the UK government to protect the archaeological heritage of England and Wales and Scotland. Under this Act, the Secretary of State has a duty to compile and maintain a schedule of ancient monuments of

national importance, in order to help preserve them. It also creates criminal offences for unauthorised works to, or damage of, these monuments.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Policies and site allocations should reflect the objectives of the strategy.

Implications for the IIA

- The IIA framework should include objectives which seek to meet historic environment and archaeology objectives.

Historic Buildings and Ancient Monuments Act (1953)

Key objectives relevant to the WLWP

- An Act of Parliament that makes provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Policies and site allocations should reflect the objectives of the strategy.

Implications for the IIA

- The IIA framework should include objectives which seek to meet historic environment objectives.

A.2

The Waste (Circular Economy) (Amendment) Regulations (2020)

Key objectives relevant to the WLWP

- To strengthen the waste hierarchy and promote waste prevention, re-use, recycling and discourage disposal and incineration.
- Separate collection waste by tightening requirements.
- Increase controls on incineration and landfill.
- Require that hazardous waste and waste oils to be separated and relax blanket bans on mixing waste oils.
- Update statutory definitions on waste.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Policies and site allocations should reflect the objectives of the strategy.

Implications for the IIA

- The IIA framework should include objectives which seek to meet the waste objectives.

Environmental Permitting Regulations (2016)

Key objectives relevant to the WLWP

- Streamlines the legislative system for industrial and waste installations into a single permitting structure for those activities which have the potential to cause harm to human health or the environment.
- They set out how to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment and human health.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Policies and site allocations should reflect the objectives of the strategy.

Implications for the IIA

- The IIA framework should include objectives which seek to meet the waste and human health objectives.

Better Connected: a strategy for integrated transport (2026)

Key objectives relevant to the WLWP

- A long term strategic framework for delivering safe, reliable, affordable and accessible transport system.
- To create better connected places for communities and improve sustainable transport.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Policies and site allocations should reflect the objectives of the strategy.

Implications for the IIA

- The IIA framework should include objectives which seek to meet sustainable transport objectives.

London

The London Plan (2021)

Key objectives relevant to the WLWP

- This spatial development strategy for London sets out an integrated economic, environmental, transport and social framework for London's development. As such it has a number of key objectives (policies) it seeks to achieve on waste:
  - To reduce waste as part of establishing a circular economy.
  - To achieve and maintain sufficient waste capacity such that London achieves self-sufficiency on waste management.
  - To safeguard and retain waste sites for wate management.

Key targets and indicators relevant to the WLWP

- The three objectives (representing three distinct policies within the London Plan) contain a number of commitments for the Mayor, Mayoral Development Corporations and Local Authorities. Key targets amongst these are:
  - ensure that there is zero biodegradable or recyclable waste to landfill by 2026.
  - meet or exceed the municipal waste recycling target of 65 per cent by 2030.
- meet or exceed the targets for each of the following waste and material streams:
  - a) construction and demolition – 95 per cent reuse/recycling/recovery
  - b) excavation – 95 per cent beneficial use

- the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026.

Implications for the WLWP

- Include objectives for new and existing waste sites to promote circular economy practices as well as for circular economy practices to be supported through other activities that support resource conservation, re-use and recycling and reductions in waste going for disposal.
- Include objectives for full net self-sufficiency for waste management for the affected area.
- Include objectives to identify compensatory waste capacity where the loss of waste sites is possible.

Implications for the IIA

- The London Plan sets out a series of intentions for waste management policy, the design and operation of waste sites and the design and operation of all built developments in London. As such, it has a number of implications for the IIA on environmental, social and economic factors to be assessed. In particular, key implications from policies specifically aimed at waste policy and waste sites are to:
  - Include objectives and site assessment criteria for waste facilities to be integrated with non-waste related development and provide other local benefits.
  - Include objectives for achieving circular economy principles.
  - Include objectives for renewable energy generation.
  - Include objectives for greenhouse gas savings.
  - Include objectives for reducing impact on amenity in surrounding areas to waste sites.
  - Include objectives that support waste minimisation.

- Include objectives and site assessment criteria to ensure waste sites are developed in accessible locations.

London Environment Strategy (2022)

Key objectives relevant to the WLWP

- This strategy of the Greater London Authority has a range of environmental objectives including for London to become a 'zero waste city'. This means that by 2026 no biodegradable or recyclable waste will be sent to landfill, and by 2030 65 per cent of London's municipal waste will be recycled. It also aims for London boroughs, businesses and the waste industry to increase the availability of recycling facilities and services.

Key targets and indicators relevant to the WLWP

- By 2026 no biodegradable or recyclable waste will be sent to landfill.
- By 2030 65 per cent of London's municipal waste will be recycled.
- By 2030 75 per cent minimum target for business waste recycling.

Implications for the WLWP

- Ensure a net zero waste capacity.
- Develop policies that support the creation of recycling facilities.
- Develop policies in relation to waste sites that support households and commercial entities to recycle (including reuse, repair, and remanufacturing services).

Implications for the IIA

- Include objectives and sites criteria that prioritise the movement of waste up the waste hierarchy and away from landfill

Climate Action Strategy 2020-2027 (2020)

Key objectives relevant to the WLWP

- The main objective of the Climate Action Strategy is for London to become a zero carbon city by 2050. This requires zero emissions from all transport and buildings, and any residual emissions in London to be offset.

Key targets and indicators relevant to the WLWP

- The London wide actions are:
  - 40% reduction in CO2 between 2018 and 2022
  - 50% reduction in CO2 between 2023 and 2027
  - Zero waste to landfill in 2026
  - 15% of demand for energy will be met by renewable and district heating sources
  - 60% reduction in CO2 between 2028 and 2032

Implications for the WLWP

- Consideration of policy to meet the requirement of zero waste to landfill across London by 2026.
- Consideration of policy to reduce emissions across the plan period.

Implications for the IIA

- Inclusion of a sustainability objective and site assessment criteria in relation to the reduction of CO2 and the complete diversion of waste from landfill by 2026

Local Nature Recovery Strategy (March 2026)

Key objectives relevant to the WLWP

- The Local Nature Recovery Strategy is a spatial tool for London's nature, created with all 33 of the London boroughs and Natural England, providing a statement of biodiversity priorities and a local habitat map.
- It explains the overarching nature recovery principles for any project in London, priorities to help improve and recover nature, along with actions (called 'measures') that landowners and others can take to make this happen.

Key targets and indicators relevant to the WLWP

- The six overarching principles are:
  - Help people enjoy nature: make it easier for all Londoners to enjoy and connect with nature, while looking after the most sensitive natural areas
  - Bigger, better, more connected, and more habitats: create, improve, and connect a mix of habitats to help nature thrive.
  - Boost wildlife populations: increase species abundance, with a focus on native and threatened species.
  - Help pollinators and minibeasts thrive: support a wide variety of invertebrates that live on land and in water, including pollinators such as bees and butterflies.

- Support healthy soils: restore and minimise disturbance to soils and fungi to support all biodiversity.
- Protect wildlife from invasive species and disease: reduce and control invasive species to protect and improve valuable habitats and species.

Implications for the WLWP

- Consider the location of areas of importance for nature recovery in policies and site allocations.

Implications for the IIA

- Inclusion of a sustainability objective and site assessment criteria for nature recovery.

Accessible London: Achieving an Inclusive Environment Supplementary Planning Guidance (2014)

Key objectives relevant to the WLWP

- The document makes reference to the separate Housing SPG for London which requires new housing developments to make communal facilities and any storage facilities for waste and recycling to be accessible to all residents, including children and wheelchair users.

Key targets and indicators relevant to the WLWP

- No indicators or targets above those in the London Plan.

Implications for the WLWP

- Consider the inclusion of policy in relation to accessible spaces

Implications for the IIA

- Inclusion of a sustainability objective and site assessment criteria for waste sites and their accessibility.

Optimising Site Capacity: A Design-led Approach LPG (2023)

Key objectives relevant to the WLWP

- The LPG provides guidance on delivering the requirements of London Plan policies:
  - Policy D1 London's form, character and capacity for growth – Part (B3)
  - Policy D3 Optimising site capacity through the design-led approach Policy
  - D4 Delivering good design
- The design capacity approach applies to all existing site allocations as well as any new sites that come forward for development.

Key targets and indicators relevant to the WLWP

- Use of the 'Indicative Capacity Toolkit'
- Indicators within the toolkit provide additional detail in relation to the London Plan, and do not set further targets.

Implications for the WLWP

- Consideration of policy and site allocations through use of the toolkit to determine suitable capacity of development on allocated waste sites and other new waste development.

Implications for the IIA

- Inclusion of objectives relating to site capacity, green infrastructure, SuDS, accessibility and heritage

Characterisation and Growth Strategy (2023)

Key objectives relevant to the WLWP

- The Characterisation and Growth Strategy guidance provides information on how to carry out a borough or neighbourhood-wide character assessment (or study). This assessment should be used to inform a borough or neighbourhoods growth strategy, setting out how an area will change in the future. This includes identifying if and where there are locations where tall buildings may be appropriate.

Key targets and indicators relevant to the WLWP

- The Characterisation and Growth Strategy guidance relates to the implementation of London Plan polices:
  - Policy D1 London's form, character and capacity for growth
  - Policy D2 Infrastructure requirements for sustainable densities
  - Policy D3 Optimising site capacity through the design-led approach
  - Policy D9 Tall buildings
  - Policy HC1 Heritage conservation and growth

- Policy SD9 (Part B) Town centres: Local partnerships and implementation

Implications for the WLWP

- Consideration of the location of waste sites in relation to the relevant Characterisation and Growth Study for each borough or neighbourhood.

Implications for the IIA

- Inclusion of objectives and site assessment criteria in relation to local characterisation and growth studies

Air Quality Positive (2023)

Key objectives relevant to the WLWP

- The Air Quality Positive approach is a process of identifying and implementing ways to push development beyond compliance with both the Air Quality Neutral benchmarks and the minimum requirements of an air quality assessment.

Key targets and indicators relevant to the WLWP

- Maximising improvements to air quality through consideration of design and layout, transport and energy.

Implications for the WLWP

- Consideration of policy to demonstrate a holistic approach to the improvement of air quality.

Implications for the IIA

- Inclusion of objectives and site assessment criteria to minimise effects on air quality.
- Inclusion of 'in combination' assessment in relation to effects on air quality.

Air Quality Neutral (2023)

Key objectives relevant to the WLWP

- To improve air quality by a reduction in emissions from the built environment.

Key targets and indicators relevant to the WLWP

- The document sets out a range of targets in relation to the emissions from heating or cooling buildings, and the effects of any trip rates associated with an individual development proposal.

Implications for the WLWP

- Consideration of site allocations in locations where trip rates will be reduced
- Consideration of policy in relation to energy from waste

Implications for the IIA

- Inclusion of objectives and site assessment criteria in relation to the reduction of emissions from waste facilities.
- Inclusion of objectives and site assessment criteria in relation to sustainable transport.

‘Be Seen’ energy monitoring guidance (2023)

Key objectives relevant to the WLWP

- The Be Seen energy monitoring guidance sets out a process of monitoring energy performance in development from planning through to 'as built' stages.

Key targets and indicators relevant to the WLWP

- Policy SI 2 of the London Plan.

Implications for the WLWP

- Consideration of policy to implement the requirement of new waste facilities to demonstrate energy performance.

Implications for the IIA

- Inclusion of objectives in relation to energy use and reduction in emissions

Circular Economy Statements (2022)

Key objectives relevant to the WLWP

- This document provides guidance for developers on producing Circular Economy Statements for new developments in London. Developers must produce statements on waste management from development and operational waste management plans should be produced as part of the Circular Economy Statements, satisfying the London Plan and London Environment Strategy (see above)

Key targets and indicators relevant to the WLWP

- As a guidance document for producing statements that show conformity with the London Plan Policy SI7 on Circular Economy and the London Plan and London Environment Strategy (see above) more broadly, it does not contain new targets or indicators to meet.

Implications for the WLWP

- Consideration of policy in relation to the requirements and outputs of Circular Economy Statements.
- Consider the requirements of new types of waste facilities to meet demands in relation to the circular economy.

Implications for the IIA

- Inclusion of objectives in relation to the circular economy and waste minimisation.
- Inclusion of site assessment criteria in relation to waste sites needed to support the circular economy.

Energy Planning Guidance (2022)

Key objectives relevant to the WLWP

- This document provides Greater London Authority guidance on preparing energy assessments as part of planning applications. It provides some guidance for waste facilities that intend to produce fuel on maximising heat and power opportunities. The updated guidance confirms that all major developments in London must continue to meet the London Plan net zero carbon target by following the energy hierarchy (Policy SI 2), the heating hierarchy (Policy SI 3) and by maximising on-site carbon reductions.

Key targets and indicators relevant to the WLWP

- As a guidance document for producing statements that show conformity with the London Plan Policy SI7 on Circular Economy and the London Plan and London Environment Strategy (see above) more broadly, it does not contain new targets or indicators to meet.

Implications for the WLWP

- Major non-residential development is included within the scope of the guidance, including the requirement for non-carbon heating.
- Possible opportunities and demand for energy from waste facilities

Implications for the IIA

- Inclusion of objectives that take account of the requirement for carbon reduction within new waste developments

The Control of Dust and Emissions During Construction and Demolition (2014)

Key objectives relevant to the WLWP

- This document provides guidance on the control of dust and emissions during construction and demolition, responding to the requirements of the London Plan 2011. As such it does not provide new objectives relevant to the WLWP.

Key targets and indicators relevant to the WLWP

- This document provides guidance on the control of dust and emissions during construction and demolition, responding to the requirements of the

London Plan 2011. As such it does not provide additional objectives relevant to the WLWP.

Implications for the WLWP

- Implications for all sites producing construction and demolitions wastes which may have an impact on waste streams

Implications for the IIA

- Include objectives for new or existing waste sites in relation to dust suppression and reduction of emissions

Whole Life-Cycle Carbon Assessments (2022)

Key objectives relevant to the WLWP

- This document explains how to prepare a Whole Life-Cycle Carbon (WLC) assessment in line with Policy SI2F of the London Plan 2021. As such it does not provide new objectives relevant to the WLWP.

Key targets and indicators relevant to the WLWP

- This document explains how to prepare a WLC assessment in line with Policy SI2F of the London Plan 2021. As such it does not provide new targets relevant to the WLWP.

Implications for the WLWP

- Consideration of WLC in relation to new or expanded waste sites.

Implications for the IIA

- Inclusion of WLC in objectives relating to climate change.

Sustainable Transport, Walking and Cycling LPG (2022)

Key objectives relevant to the WLWP

- This document provides guidance for plan-makers and developers on transport, walking and cycling in London, including the protection of planned schemes.

Key targets and indicators relevant to the WLWP

- None above the requirements of the London Plan.

Implications for the WLWP

- Consideration of the location new or expanded waste sites in relation to the effects on sustainable transport networks.

Implications for the IIA

- Inclusion of objectives and site assessment criteria relating to the impacts of waste sites on sustainable transport networks.

Natural England, Urban Greening Factor (2023)

Key objectives relevant to the WLWP

- The Urban Greening Factor is a tool used to evaluate the quality and quantity of natural features proposed as part of a development application, such as planting, waterbodies, and green roofs, collectively referred to as urban greening. This document advises developers on how to meet these requirements under London Plan Policy G5 Urban Greening.

Key targets and indicators relevant to the WLWP

- The Urban Greening Factor tool sets out design considerations in relation to the natural and built environment and provides a score in terms of meeting the aims of policy G5 of the London Plan.

Implications for the WLWP

- Consideration of the location of waste sites in relation to Sites of Importance for Nature Conservation (SINC), the Public Realm and Sustainable Drainage Systems (SuDS), as well as the potential opportunities for biodiversity in relation to roofs and facades of buildings.

Implications for the IIA

- Inclusion of objectives and site assessment criteria relating to SINCs, SuDS, and biodiversity gain.

London Sustainable Drainage Action Plan (2015)

Key objectives relevant to the WLWP

- This document is a long-term plan to coordinate the development of 'sustainable drainage' systems across London. The plan has been developed by the Drain London Programme, a partnership of the Mayor of London, Environment Agency, London Boroughs and Thames Water. It sets out a range of actions for each major land-use sector including major utilities. As such, it makes very brief mention of some waste management sites likely being able to deliver SuDS cost-effectively.

Key targets and indicators relevant to the WLWP

- To achieve a 1% reduction in surface water flows in the sewer network each year for 25 years, resulting in a 25% reduction in flows by 2040.

Implications for the WLWP

- Consideration of policy and site allocations in relation to sustainable drainage within a London wide context.

Implications for the IIA

- Inclusion of objectives and site assessment criteria in relation to urban drainage

Energy Planning Guidance (2022)

Key objectives relevant to the Waste Local Plan

- This document provides Greater London Authority guidance on preparing energy assessments as part of planning applications. It provides some guidance for waste facilities that intend to produce fuel on maximising heat and power opportunities. The updated guidance confirms that all major developments in London must continue to meet the London Plan net zero carbon target by following the energy hierarchy (Policy SI 2), the heating hierarchy (Policy SI 3) and by maximising on-site carbon reductions.

Key targets and indicators relevant to the Waste Local Plan

- As a guidance document for producing statements that show conformity with the London Plan Policy SI7 on Circular Economy and the London Plan and London Environment Strategy (see above) more broadly, it does not contain new targets or indicators to meet.

Implications for the Waste Local Plan

- Major non-residential development is included within the scope of the guidance, including the requirement for non-carbon heating.
- Possible opportunities and demand for energy from waste facilities

Implications for the IIA

- Inclusion of objectives that take account of the requirement for carbon reduction within new waste developments

DEFRA, Thames Estuary 2100 Plan (2023)

Key objectives relevant to the Waste Local Plan

- This document is a long-term plan to ensure the management of flood risk from the Thames. The plan was developed by the Environment Agency in partnership with others. It sets out a range of actions for landowners, regulators, developers and policy makers.
- The Thames Estuary 2100 Plan (TE2100) is a strategic plan for adapting to rising sea levels in the estuary, with 3 main aims:
  - Take an adaptive approach to manage tidal flooding and create climate resilient communities.
  - Protect and enhance the value of the Thames, its tidal tributaries and floodplain. Deliver social, cultural and commercial benefits for communities and support resilient growth.
  - Tackle the climate and nature crises by putting sustainability at the heart of this Plan. Restore ecosystems, reduce carbon emissions, and deliver environmental and biodiversity net gain.

Key targets and indicators relevant to the Waste Local Plan

- Ensuring there is no inappropriate development in tidal flood risk areas

Implications for the Waste Local Plan

- Ensure waste management infrastructure is designed to minimise flood risk and support climate adaptation, carbon reduction, and environmental and biodiversity net gain.

- Align with TE2100's wider strategic aims, including embedding carbon reduction, contributing to biodiversity net gain, and integrating with community-led visions for resilient riversides.
- West London should ensure that the requirements of the TE2100 Plan are fully considered, including the need for flood defences to remain fit for purpose for the lifetime of any development. This will require safeguarding land adjacent to the Thames to enable future flood defence raising and ensuring that policies and site allocations support these long-term resilience measures.

Implications for the IIA

- Inclusion of objectives and site assessment criteria in relation to flood risk

EA, River Thames Scheme (2021)

Key objectives relevant to the Waste Local Plan

- This document is a long-term plan to ensure the management of flood risk from the Thames, in Surrey and West London. The plan was developed by the Environment Agency in partnership with others. It sets out a range of actions for landowners, regulators, developers and policy makers.

Key targets and indicators relevant to the Waste Local Plan

- Ensuring there is no inappropriate development in tidal flood risk areas within West London.

Implications for the Waste Local Plan

- Consideration of policy and site allocations in relation to minimising flood risk and contributing to flood defences along the Thames. Ensuring landowners or developers to raise or adapt flood defences as part of any planned development.

Implications for the IIA

- Inclusion of objectives and site assessment criteria in relation to flood risk.

Thames 21 5 Year Plan (2022)

Key objectives relevant to the Waste Local Plan

- Connect people with rivers to improve stewardship and local engagement.
- Create climate-resilient rivers and communities
- Tackle diffuse pollution from cities including road run-off pollution
- Work in partnership with all sectors, including the plastic supply chain, to tackle pollution and waste, such as that from sewage systems, and lobby for change.
- Restore degraded urban rivers and reduce plastic and chemical pollution.

Key targets and indicators relevant to the Waste Local Plan

- Work with farmers to reduce pollution, abstraction, flood risk for their and the rivers' benefit
- Identify and quantify pollution with a view to enabling resolutions

Implications for the Waste Local Plan

- Promote community engagement in environmental enhancement around sites.

Implications for the IIA

- Include objectives to enhance urban rivers and reduce pollution.

Towards a New London Plan (2025 consultation – emerging policy direction)

Key objectives relevant to the WLWP

- A London-wide industrial land requirement.
- Better efficiency standards and whole-life carbon and alignment with London's net zero targets.
- Reducing waste and using resources more efficiently

Key targets and indicators relevant to the WLWP

- Includes no key targets or indicators.

Implications for the Waste Local Plan

- Consideration of London Plan waste apportionment policy, the need to safeguard existing waste capacity, and potentially allocate new waste sites in appropriate locations in line with emerging London Plan policy.

Implications for the IIA

- Inclusion of objectives and site assessment criteria in relation to sustainable waste management/transport, the Greater London economy and human health.

London Growth Plan (2025)

Key objectives relevant to the WLWP

- To restore London's economic productivity to historic norms following its post-2008 collapse.

Key targets and indicators relevant to the WLWP

- 2% annual productivity growth for the next decade
- £107 billion added to London's economy by 2035
- Around 150,000 new good-quality jobs by 2028
- A 20% uplift in real household income for the lowest-earning 20% of Londoners by 2035

Implications for the Waste Local Plan

- Consideration of employment opportunities relating to waste management that could be provided within a London wide context.

Implications for the IIA

- Inclusion of objectives and site assessment criteria in relation to the economy and employment.

London Environment Strategy – implementation updates (2025–26)

Key objectives relevant to the WLWP

- Focus on net zero 2030 and climate change mitigation, resilience and nature recovery, improving air quality and green infrastructure.
- Implementation is tightly aligned with growth, health and housing policy.

Key targets and indicators relevant to the WLWP

- Includes no key targets or indicators.

Implications for the Waste Local Plan

- Consideration of policy and site allocations in relation to air quality, nature recovery and resilience, green infrastructure and climate change mitigation within a London wide context.

Implications for the IIA

- Inclusion of objectives and site assessment criteria in relation to climate change, air quality, ecology and landscape.

Appendix B

Responses from Statutory Consultees to the Regulation 18 WLWP

Historic England

Table B.1: Historic England

Comment	IIA Team Response
The response refers to IIA agreeing with the recommendation made in the report: The Integrated Impact Assessment draws attention to this weakness saying (3.41): "Although there is a high level of protection afforded historic sites within the NPPF and NPPW, more of an emphasis could be placed within the emerging WLWP on requiring any waste redevelopments to be designed and built so as to minimise adverse effects on the county's historic environment above and below ground". We agree with that comment. There is currently no reference to the historic environment within the vision and objectives of the plan. Specific references to preserving the historic environment could be included for example in Strategic Objective 4 and 5.	Noted. No action required for the IIA.

Natural England

Table B.2: Natural England

Comment	LUC Response
No comments were made regarding IIA in the response but comments were made regarding HRA. The absence of new site allocations reduces the likelihood of direct land take or impacts on functionally linked habitats, which is welcomed. Given this the findings at Appropriate Assessment stage are acceptable and should they be adhered to should avoid adverse effects and maintain current environmental conditions.	Noted. No action required in the IIA. The HRA comments are recorded and addressed in the separate HRA Report for the WLWP.

Environment Agency

Table B.3: Environment Agency

Comment	LUC Response
No reference to IIA or HRA in the response.	Noted. No action required.

Marine Management Organisation

Table B.4: Marine Management Organisation

Comment	LUC Response
No reference to IIA or HRA in the response. As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the South East Marine Plan is of relevance.	Noted. Reference to the South East Marine Plan and UK Marine Policy Statement has been added to the review of relevant plans and programmes in **Appendix A** of this IIA Report.

Ministry of Defence

Table B.5: Ministry of Defence

Comment	LUC Response
No reference to IIA or HRA in the response. The area covered by any West London Waste Plan will both contain and be washed over by aerodrome height, birdstrike and technical safeguarding zones that are	Noted. No action required.

Comment	LUC Response
designated to preserve the operation and capability of RAF Northolt. The MOD's primary concern with respect to waste development within a birdstrike safeguarding zone covered by the West London Waste Plan is the potential for a given site to degrade aviation safety by increasing the risk of birdstrike. In addition to birdstrike issues, MOD may have concerns that waste development might incorporate or require structures that might fall within safeguarding zones drawn to preserve the operation and capability of technical assets such as communication systems, navigational equipment, or radar; or that might project into the airspace above and surrounding an aerodrome.	

National Highways

Table B.6: National Highways

Comment	LUC Response
No reference to IIA or HRA in the response. National Highways is responsible for the safe and efficient operation of the Strategic Road Network (SRN). Our interest in West London relates to ensuring that any proposed waste sites or development generating significant HGV traffic do not adversely affect the safety, capacity, or operation of the SRN. Our network	Noted. No action required.

Comment	LUC Response
in West London includes the M25, M40, M3, M4 and A30.	

Herts & Middlesex Wildlife Trust

Table B.7: Herts & Middlesex Wildlife Trust

Comment	LUC Response
The IIA underplays the risk of biodiversity impacts by focussing on the generic impacts of policies rather than the risk of specific impacts arising from the close proximity of waste sites to nature conservation sites. Paragraph 3.45 is unduly optimistic; firstly, SINCs do not receive statutory protection. Secondly, although emerging proposals may present opportunities to manage the sensitivities of the sites and biodiversity networks, they may equally present a risk to sites in close proximity. Biodiversity net gain cannot be relied upon to make any meaningful contribution to local biodiversity. Most existing waste sites are relatively small and contain negligible biodiversity, so any biodiversity net gain is likely to be correspondingly insignificant (and likely to be provided offsite, not necessarily in the immediate area). In any case, biodiversity net gain is not designed to be used as mitigation for specific impacts; the impacts of any proposal must be considered in the usual way through the planning process following the mitigation hierarchy (firstly avoid impacts, then mitigate,	Noted. Para. 3.45 in Chapter 3 (now para. 3.44) has been updated to refer to policy protection in the London Plan rather than statutory protection for SINCs, and edited to remove the reference to BNG as an example. However, it should be noted that **Chapter 3** of the IIA report describes the existing sustainability issues and how they might evolve over time if the WLWP were not to be updated. **Chapter 5** of the IIA report sets out the predicted effects of the WLWP policies, and clearly recognises the potential for negative as well as positive effects on IIA 7: biodiversity. As noted in para. 5.116 of the Regulation 18 IIA Report: "Although some potential minor negative effects have still been identified for the emerging WLWP policies included in the Regulation 18 plan, it is recognised that waste proposals coming forward will also need to be in conformity with the development management policies in each borough's and OPDC's Local Plans, as well as the London Plan. Therefore, in order to avoid duplicating requirements in relation to issues such as biodiversity protection and enhancement, use of green

Comment	LUC Response
finally compensate as a last resort) independently of the application of the statutory requirement for a minimum of 10% biodiversity net gain. This further reinforces our position that Policy WLWP 4 should be strengthened to recognise the high risk of impacts to designated nature conservation sites, as described in our response to that policy.	infrastructure and SuDS, protection and enhancement of the historic environment etc., the IIA does not have any further recommendations to make for the emerging WLWP policies."

Responses from Statutory Consultees to the WLWP Scoping Report (as presented in Appendix B of the Regulation 18 draft IIA)

Historic England

Table B.8: Historic England

Comment	IIA Team Response
Historic England is a statutory consultation body in relation to the SEA Directive in regard to any matters affecting the historic environment. We are content that the scoping report for West London Waste Plan adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets.	Noted. No action required.

Comment	IIA Team Response
Historic England has prepared generic guidance with regards to our involvement in the various stages of the local plan process which you may find helpful in preparing the Sustainability Appraisal. This is available to download here: https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/	Thank you for providing Historic England Advice Note no.8, which gives useful guidance for undertaking Sustainability Appraisal. This guidance note has been reviewed to guide the assessment of effects on the historic environment and development of potential mitigation identified in this IIA Report.
This opinion is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposals which may subsequently arise from this or later versions of the plan which is the subject of consultation, and which may, despite the IIA, have adverse effects on the historic environment.	Noted. No action required.

Natural England

Table B.9: Natural England

Comment	LUC Response
We would have the following comments to make regarding the proposed objectives against which the WLWP will be assessed under: IIA objectives 1, 2, 5, 7, 8, 9, 11 & 12. The scope covered under these objectives is that which we would	Noted. No action required.

Comment	LUC Response
expect to be covered alongside the impacts to the Richmond Park SAC which isn't mentioned here but is solely cited under the borough by borough summary.	
We would expect the Habitats Regulations Assessment (HRA) to screen the impacts on these sites like Richmond Park SAC and others outside the boroughs boundaries should be scoped in including (but not limited to) Wimbledon Common SAC, South West London Water Bodies SPA / Ramsar sites, Lee Valley SPA / Ramsar, Windsor Forest & Great Park SAC and Burnham Beeches SAC for instance.	The comment is noted and addressed through the separate HRA Report for the WLWP.
Within chapter 3 under the section covering Hounslow in paragraph 3.136 the Syon Park SSSI is incorrectly named as Sydon Park Tide Meadow SSSI and should be amended.	Reference to the Syon Park SSSI has been updated throughout the IIA Report.

Environment Agency

Table B.10: Environment Agency

Comment	LUC Response
We are pleased to see the inclusion of The National Flood and Coastal Erosion Risk Management Strategy for England 2022 and DLHC Flood Risk and Coastal Guidance 2022. In relation to appendix A, we are pleased to see inclusion of and reference to The London Plan 2021.	The review of relevant plans, policies and programmes (provided in Appendix A of the Scoping Report) has been updated in this IIA Report to include reference to the Thames River Basin Management Plan (2022), The National Framework for Water Resources (2020), and the Water Framework Directive (2017). In

Comment	LUC Response
In terms of plans and programmes which we think should also be included referenced, we suggest the following: We would like you to have inclusion of and reference to: - The Thames River Basin Management Plan 2022 - The National Framework for Water Resources 2020 - The Water Framework Directive 2017 We also suggest that the following polices related to biodiversity and local catchment and river basin management plans are included: - Biodiversity Net Gain - Thames21 5 Year Plan - Nature Based Solutions (IUCN)	addition, the Biodiversity Net Gain strategy, Thames21 5 Year Plan and the Global Standards for Nature-based Solutions have been included within the updated review of relevant plans, policies and programmes in Appendix A of this IIA Report.
The report highlights the increase in frequency and/or vulnerability to flood events with climate change. It acknowledges the Thames tidal defences and TE2100 Plan at protecting the Thames Estuary from flooding caused by climate change. Although the report summarises the flood risk sources in each borough, this should be explored in greater detail by each borough in their local plans to determine high risk flood areas in relation to planning and development. Development should be steered to the areas with the lowest probability of flooding, as set out in the National Planning Policy Framework (NPPF). It should be noted that landfill sites and hazardous waste management facilities are classified as more vulnerable as shown in table 2 of the Planning	Noted. Reference to landfill sites and hazardous waste management facilities being classified as more vulnerable, and therefore considered appropriate in Flood Zones 1 and 2, and in flood zone 3a if the exception test is passed, has been included referenced within the policy review in Appendix A.

Comment	LUC Response
Practice guidance (PPG). In accordance with table 2 of the PPG more vulnerable developments are appropriate in Flood Zones 1 and 2, under Annex 3 of the NPPF these developments are only appropriate in flood zone 3a if the exception test is passed.	
We approve of the report recognising an opportunity to encourage flood resilient buildings in any redevelopment of waste sites to help adapt to climate change. Future development must ensure that climate change is being assessed and considered at the planning stage. They need to be built with this in mind and to the appropriate climate change allowances. Developments must be safe for their lifetime taking into account the impact of climate change on flood risk.	Noted. No action required.
We are pleased to see reference to The London Plan and water consumption, (pt 3.155 p84) and that the plan 'Must meet the London Plan (pt 2.13 p27). We are also pleased to see reference to the Thames Water annual performance report 2021/22 (pt 3.156 p76).	Noted. No action required.
We believe that the report lacks reference to regulation 33 of the Water Framework Directive (WFD), Councils have a legal responsibility to have regard for the Thames River Basin Management Plan, which in turn has a legal responsibility to ensure that there is no deterioration in the ecological status of any Water Framework Directive (WFD) water body or of its associated elements. Councils therefore have a legal responsibility to avoid the deterioration of WFD water bodies	The review of relevant plans, policies and programmes has been updated in this IIA Report to include reference to the Thames River Basin Management Plan (2022), and regulation 33 of the Water Framework Directive (2017).

Comment	LUC Response
and their associated elements, and to support their enhancements. These responsibilities are reinforced by the London Plan, policy SI 5D1 p.356. This may be suitable for inclusion in section 2.13.	
We would also like to see reference to the Catchment Data Explorer for more information on those water bodies 'Reasons for not achieving good' (RNAGS). Each borough has specific and complex issues affecting their respective water bodies, as this is an overarching document each borough should explore and establish their own sensitivity to risk for their waterbodies in relation to planning and development This should be noted in the plan. Bespoke planning responses are required for each London Borough.	Further information has been included in the baseline in Appendix C explaining why water bodies within the WLWP area are not achieving 'good' status.
Whilst the TE2100 Plan is referred to, we would like to see more detail on this in relation to the WLWP. West London should consider the requirements of the TE2100 Plan, flood defences must remain fit for purpose for the lifetime of any development. Flood defence raising will require safeguarding of land adjacent to the Thames to allow the defence raising to take place.	The review of baseline and relevant plans, policies and programmes has been updated in this IIA Report to include greater detail about the Thames Estuary 2100 Plan.
We would also like to see specific reference to paragraph 162 of the National Planning Policy Framework which states that: **'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of**	The review of relevant plans, policies and programmes has been updated in this IIA Report to include reference to paragraph 162 of the NPPF.

Comment	LUC Response
overheating from rising temperatures'.	
We also recommend that the report includes that commercial developments such as waste facilities achieve a BREEAM rating of 'excellent' in the water efficiency category (WAT 01) (or equivalent). It is important to stress the WAT 01 category, as a BREEAM 'excellent' rating cannot be achieved without paying attention to water efficiency measures (an 'excellent' rating is given to an overall building sustainability score of 70-84%). This is as per with part C2 of Policy SI 5 in the London Plan (page 356).	The IIA has not made additional recommendations for the WLWP to specifically reference water efficiency requirements within its policies, as it is already clearly set out in the London Plan, and many of the Borough Local Plans also require water efficiency measures in new commercial developments.
Whilst Sustainable drainage systems are referenced in objective 10, we would like to see its importance raised for reducing surface water runoff. This is extremely import for waste management sites. The London Plan asserts that SuDS should be used in all developments in order to reduce surface run-off (Policy SI 13, page 385-386). The London Plan also stipulates that SuDS should be installed in public spaces (Policy D8 I, page 135; Policy G5 A, page 322).	Reference to surface water runoff has been added within the appraisal questions for IIA objective 10: Manage and reduce flood risk from all sources. The IIA has not made additional recommendations for the WLWP to specifically reference surface water runoff within its policies, as it is already clearly set out in the London Plan, and many of the Borough Local Plans also require SuDS in new developments.
We are happy with objectives 9 and 10, and as above the TE2100 Plan should also be considered.	Noted. This IIA Report has been updated to include greater detail about the Thames Estuary 2100 Plan.
We were pleased to see references made to habitat continuity, wildlife corridors, and included locally designated biodiversity assets such as Local Nature Reserves in addition to European and Nationally protected sites. We strongly recommend that Figure 3.5: Biodiversity (Page 98) is updated to provide a more	Noted. Figure 3.5: Biodiversity from the Scoping Report has been updated in this IIA Report to include Sites of Important for Nature Conservation, the river and canal network, and wildlife corridors. (See Figure C.5 at the end of Appendix C.)

Comment	LUC Response
comprehensive view of biodiversity assets in the area. Please add all locally designated biodiversity assets including LNCs, SINCS, river and canal network, wildlife corridors.	
We were pleased to see references made to between biodiversity and human health. Additional reference could made to how biodiversity assets such as trees and rivers provide other services and functions in urban areas: e.g. air cooling effect and reduction of particulate matter, pollution attenuation, noise reduction, flood management, pollinator support, and increased property values.	The appraisal questions for IIA Objective 4 have been updated to make specific reference to Nature Based Solutions which delivers benefits to people and nature at the same time.
We suggest that more specific objectives should be included to encompass aquatic habitats in addition to land-based biodiversity features. E.g.: - Will it contribute towards biodiversity net gain/ has a BNG assessment been undertaken for new developments? - Will it avoid harm, protect, and improve local populations of aquatic and wetland species that are of international, national, regional or local importance? - Will it maintain and enhance wildlife corridors and minimise fragmentation of ecological areas and green and blue spaces, enhancing biodiversity and securing the level of net-gain set out in local, regional and national policy? - Will it avoid negative impact on water quality and therefore biodiversity particularly within aquatic/wetland habitats?	IIA Objectives 4, 7 and 10 within the IIA Framework have been updated to include these appraisal questions where appropriate.

Appendix B Responses from Statutory Consultees to the WLWP Scoping Report (as presented in Appendix B of the Regulation 18 draft IIA)

Comment	LUC Response
- Will it maintain or contribute towards an improved Water Framework Directive ecological status? - Will it promote public access and engagement with green and blue spaces? - Will it incorporate Nature Based Solutions to deliver multiple benefits to people and nature at the same time?	

Appendix C

Baseline Information

C.1 Baseline information provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps to identify key sustainability issues.

C.2 Schedule 2 of the SEA Regulations requires information to be provided on:

- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.
- The environmental characteristics of areas likely to be significantly affected.
- Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC (replaced by 92/43/EEC) on the conservation of wild birds and the Habitats Directive [92/43/EEC].

C.3 The environmental, social and economic baseline for the WLWP is set out in this chapter under the following topic headers:

- Waste.
- Climate change, adaptation and mitigation.
- Population, health and wellbeing.
- Economy.
- Transport.
- Historic environment.
- Landscape and townscape.
- Biodiversity and Geodiversity.

- Air, land and water quality.

C.4 In line with the requirements of Schedule 2 of the SEA Regulations (see paragraph C.2 above), analysis of baseline information and the policy context has informed identification of sustainability issues facing the Local Planning Authorities party to the emerging updated WLWP. The key sustainability issues that have been identified are set out underneath each baseline topic section, along with an indication of the likely evolution of these issues without the emerging updated WLWP, i.e. whether the WLWP could avoid exacerbating these issues or help to solve them. It is assumed that even if the emerging updated WLWP were not adopted, there would still be the policies in the NPPF, NPPW, the London Plan, the adopted WLWP and West London Local Plans, which would all provide policies that any new waste management applications would be assessed against.

C.5 Maps illustrating the spatial dimension of some of the baseline conditions described below are presented at the end of this chapter.

Waste

Waste Streams

C.6 An "Assessment of Existing Waste Management Capacity in West London 2025" **[See reference** 31**]** has been prepared to inform the updated WLWP supported by baseline and forecasts for C,D&E waste **[See reference 32]**, Hazardous Waste in the Plan area **[See reference 33]** and significant waste flows **[See reference** 34**]**. These documents have been used to prepare the following text.

C.7 The London Plan 2021 includes forecast arisings of Local Authority Collected Waste (referred to as household waste) plus Commercial and Industrial waste for London by Borough to 2041 - collectively referred to as HIC waste. These forecasts are used as a starting point to allocate quantities of HIC

waste to be managed by each Borough in west London in specific ways (referred to as qualifying capacity as set out below) so that the overall goal of managing the equivalent of 100 per cent of London's waste within London (i.e. net self-sufficiency) by 2026 (London Plan Policy SI 8) is achieved. This specifically excludes excavation waste from the aim of overall net self-sufficiency as the particular characteristics of this waste stream mean that it will be challenging for London to provide either the sites or the level of compensatory provision needed (paragraph 9.8.1 of the London Plan). These allocations of HIC waste for management are referred to as "LP apportionments". The apportionments have been derived through a process that includes assessment of existing capacity in each Borough along with a number of other factors that are considered to determine the ability of a particular Borough to accommodate qualifying waste management capacity **[See reference 35]**.

C.8 The types of capacity considered to count towards the management of apportioned HIC waste (referred to as "qualifying capacity") are listed in paragraph 9.8.4 of the London Plan as follows:

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

C.9 The London Plan also sets out management targets for waste generated in London in Policy SI 7 Reducing waste and supporting the circular economy as follows:

- ensure that there is zero biodegradable or recyclable waste arising in London going to landfill by 2026;
- meet or exceed the municipal waste recycling target of 65 per cent by 2030 (London Plan Footnote 163: Based on the EU definition of municipal waste

being household waste and other waste similar in composition to household waste. This includes business waste collected by local authorities and by the private sector.);

- 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 (London Plan Footnote 164 All inert excavation waste should be used for beneficial purposes.)

C.10 In addition, for hazardous waste management capacity, paragraph 9.8.18 of the London Plan states "…a need to continue to identify hazardous waste capacity for London. The main requirement is for sites for regional facilities to be identified. Boroughs will need to work with neighbouring authorities to consider the necessary facilities when planning for their hazardous waste." Hence there is no expectation that London should be net self-sufficient in management capacity for hazardous waste alone, although hazardous waste that arises in the HIC waste stream is included in the LP apportionment values (Para 9.8.18 LP).

C.11 The report provides an assessment of how the existing waste management capacity in West London meets the management requirements for:

- household, commercial and industrial waste (HIC) apportioned to the six Boroughs by the London Plan 2021 through to 2041; and
- Construction, Demolition and Excavation (C, D & E) waste and hazardous waste forecast to arise in West London to 2041.

C.12 The methodology applied builds on that used to undertake the capacity assessment that underpinned the adopted WLWP (July 2015) following examination, where the methodology was subject to scrutiny and its outputs found sound by the Inspector. The findings of the capacity review are summarised below.

Qualifying Management Capacity for Apportioned HIC Waste

C.13 There is sufficient qualifying management capacity to manage the LP apportioned HIC waste to 2041.

Management Capacity for C, D & E Waste

C.14 There is sufficient capacity to manage the forecast C, D & E waste arisings from West London to 2041. Note that excavation waste is excluded from the aim of overall net self-sufficiency in London Plan Policy SI 8.

Landfill Capacity for Residual non-inert waste

C.15 In the absence of any operational non-hazardous landfill capacity in the Plan area, and the expectation of a continuing, albeit reducing, requirement for non-hazardous waste landfill, reduced reliance on export to landfills located outside west London is expected to continue.

Permanent Deposit to Land Management Capacity for Inert Waste

C.16 The London Plan sets a target for all inert excavation waste produced in London to be put to beneficial use i.e. not disposed of without a specific purpose, but it is not subject to the overall objective of management within London and hence can take place outside London. The assessment of capacity in west London indicates that existing capacity at railhead transfer sites and consented permanent deposit to land site in combination should be sufficient to ensure safe management of this waste stream.

Management Capacity for Hazardous Waste

C.17 There is sufficient capacity to manage the forecast hazardous waste arisings in the Plan area through to 2041. As stated previously there is no policy expectation that individual Plan areas be net self-sufficient for the management of hazardous waste forecast to be produced.

Climate change adaptation and mitigation

Climate change predictions

C.18 Climate change presents a global risk, with a range of different social, economic and environmental impacts that are likely to be felt across numerous receptors. A key challenge in protecting the environment will be to tackle the causes and consequences of climate change. The consequences include predictions of warmer, drier summers and wetter winters with more severe weather events all year as well resulting in higher sea levels and increased river flooding. A strong reaction is required from planning to ensure appropriate action can be taken to help species and habitats adapt and to enable the agricultural sector to continue to deliver diverse, affordable and good quality produce.

C.19 There has been a general trend towards warmer average temperatures in recent years. 2024 was provisionally the fourth warmest year on record for the UK, with a mean temperature of 9.78°C, which is 0.64°C above the 1991 – 2020 average. Only 2022, 2023, and 2014 recorded higher average temperatures. All the top ten warmest years for the UK in the series from 1884 have occurred since 2000, with five of them in the most recent decade (2015 – 2024) **[See reference 36]**.

C.20 Heavy rainfall and flooding events have been demonstrated to have increased potential to occur in the UK as the climate has generally become wetter. For example, five of the 10 wettest years for the UK in the series from 1836 have occurred in the 21st century. The most recent decade (2014–2023) has been 2% wetter than 1991–2020 and 10% wetter than 1961–1990 **[See reference 37]**. 2024 was another relatively wet year with the UK recording 1242mm, 107% of average rainfall. It was particularly wet across parts of central southern England with a quarter to a third more rain than normal. Oxfordshire, Wiltshire, Gloucestershire, Bedfordshire and Buckinghamshire each recorded their second-wettest year in records from 1836. England had its 8th wettest year, although not as wet as 2023 (ranked 4th) **[See reference 38]**.

C.21 The Intergovernmental Panel on Climate Change (IPCC) special report on global warming outlines that, under emissions in line with current pledges under the Paris Agreement, global warming is expected to surpass 1.5°C, even if these pledges are supplemented with very challenging increases in the scale and ambition of mitigation after 2030. This increased action would need to achieve net zero CO_2 emissions in less than 15 years **[See reference 39]**.

C.22 In December 2018, the London Assembly declared a climate emergency and called on the Mayor of London to do likewise and put in place specific emergency plans so that London is carbon neutral by 2030 **[See reference 40]**. The Mayor declared a climate emergency shortly after the Assembly and set a target for London to be net zero-carbon by 2030.

C.23 Climate change emergencies have been declared by each of the West London Boroughs. These occurred in:

- London Borough of Brent: July 2019 **[See reference 41]**
- London Borough of Ealing: April 2019 **[See reference 42]**
- London Borough of Harrow: July 2019 **[See reference 43]**
- London Borough of Hounslow: June 2019 **[See reference 44]**
- London Borough of Hillingdon: January 2020 **[See reference 45]**

- London Borough of Richmond upon Thames: July 2019 **[See reference 46]**

C.24 The OPDC as a mayoral development corporation has not made its own declaration but, as noted above, the Mayor of London declared a climate emergency in 2018.

C.25 UK Climate Projections 18 (UKCP18) for London identify the following main changes (relative to 1981-2000) to the climate by the end of the plan period **[See reference 47]**:

- Increase in mean winter temperature by 0.9°C;
- Increase in mean summer temperature by 1.3°C;
- Increase in mean winter precipitation by 8%; and
- Decrease in mean summer precipitation by -9%.

C.26 The UK Climate Risk Independent Assessment (CCEA3) identifies likely trends from climate change and sets out 61 specific risks and opportunities to the UK from climate change, including the following **[See reference 48]**:

Risks

- The number of incidents of food poisoning, heat stress and heat related deaths may increase in summer.
- Domestic energy use may increase during summer months as refrigeration and air conditioning demand increases.
- Wetter winters and more intense rainfall events throughout the year may result in a higher risk of flooding from rivers.
- More intense rainstorms may in some locations result in the amount of surface water runoff exceeding the capacity of drainage systems, consequently leading to more frequent and severe localised flash flooding.

- More frequent storms and floods may cause increased damage to property and infrastructure, resulting in significant economic costs.
- Periods of drought in summer could lead to soil shrinking and subsidence, causing damage to buildings and transport networks. Drought may also impact negatively on agriculture, industry and biodiversity.
- Warmer and drier summers are likely to affect the quantity and quality of water supply, which will need careful management.
- The changing climate will impact on the behaviour and distribution of species and may encourage the spread of invasive species.

Opportunities

- Milder winters should reduce the costs of heating homes and other buildings, helping to alleviate fuel poverty and reducing the number of winter deaths from cold.
- Domestic energy use may decrease in winter due to higher temperatures.
- Warmer and drier summers may benefit the recreation and tourism economy.

Emissions and energy

C.27 Carbon dioxide (CO_2) is the main greenhouse gas, accounting for about 80% of the UK greenhouse gas emissions. Emissions are produced when fossil fuels such as coal or gas are burnt or processed. In recent years, increasing emphasis has been placed on the role of regional bodies and local government in contributing to energy efficiency improvements, and hence reductions in carbon dioxide emissions. In line with the wider UK, London has seen a decrease in CO_2 emissions in recent years. One of the main drivers for reduced levels of emissions has been a decrease in the use of coal for electricity generation, accounting for a decrease in emissions for domestic electricity.

C.28 The Government regularly publishes local authority and regional carbon dioxide emissions national statistics **[See reference 49]**. The statistics are largely consistent with the UK national Greenhouse Gas Inventory and with the Devolved Administration Greenhouse Gas Inventories. In London, CO_2 emissions have fallen from 6.4 tonnes (t) per capita to 3t per capita (equivalent to a 74% reduction) from 2005 to 2023. Only provisional estimates are available for 2024, so have not been used. Emissions in each of the West London Boroughs (excluding OPDC) are like those of London, falling steadily over the same period as demonstrated in **Table C.1 (Total Emissions)** and **Table C.2 (Per Capita Emissions)**.

Table C.1: CO_2 emissions estimates in the WLWP Area 2005-2023 (Kt)

Year	Brent	Ealing	Harrow	Hounslow	Hillingdon	Richmond
2005	1,523.4	1,817.6	1,048.2	1,658.6	2,380.2	1,077.1
2006	1,480.3	1,835.0	1,032.0	1,686.7	2,366.4	1,070.9
2007	1,478.1	1,811.8	1,005.7	1,636.8	2,257.3	1,043.0
2008	1,499.9	1,779.2	1,002.0	1,566.6	2,359.1	1,020.2
2009	1,364.0	1,636.1	907.7	1,464.7	2,115.3	930.2

Year	Brent	Ealing	Harrow	Hounslow	Hillingdon	Richmond
2010	1,357.1	1,704.9	991.1	1,565.7	2,142.7	967.9
2011	1,218.6	1,581.2	889.3	1,459.3	1,871.4	862.0
2012	1,417.6	1,679.1	947.5	1,522.6	2,118.8	925.6
2013	1,379.2	1,668.5	917.3	1,467.9	2,081.6	907.5
2014	1,157.7	1,463.1	804.4	1,312.0	1,793.0	791.6
2015	1,062.2	1,365.0	768.6	1,196.2	1,704.8	744.8
2016	1,021.1	1,271.5	724.0	1,124.6	1,618.0	706.5
2017	997.2	1,230.7	687.4	1,056.2	1,550.8	668.9
2018	1,013.2	1,214.1	688.4	1,046.1	1,530.9	663.5
2019	967.7	1,141.0	660.4	989.0	1,473.4	627.3
2020	901.2	1,046.2	607.4	863.5	1,236.6	574.6
2021	970.2	1,137.6	612.4	943.7	1,347.0	623.4
2022	877.3	1,060.3	551.3	900.1	1,315.8	567.9
2023	811.0	975.4	511.2	835.6	1,265.0	529.3

Table C.2: CO2 emissions estimates by West London Borough (per capita, tonnes of carbon dioxide equivalent)

Year	Brent	Ealing	Harrow	Hounslow	Hillingdon	Richmond
2005	5.6	5.8	4.7	7.4	9.5	5.9
2006	5.4	5.8	4.6	7.4	9.3	5.9
2007	5.2	5.7	4.4	7.0	8.8	5.7
2008	5.2	5.5	4.4	6.6	9.0	5.6
2009	4.6	5.0	3.9	6.0	8.0	5.0
2010	4.5	5.1	4.2	6.3	8.0	5.2
2011	3.9	4.7	3.7	5.7	6.8	4.6
2012	4.5	4.9	3.9	5.8	7.5	4.9
2013	4.3	4.8	3.7	5.5	7.3	4.7
2014	3.5	4.1	3.2	4.8	6.2	4.1

Year	Brent	Ealing	Harrow	Hounslow	Hillingdon	Richmond
2015	3.2	3.8	3.0	4.3	5.8	3.8
2016	3.0	3.5	2.8	4.0	5.4	3.6
2017	2.9	3.4	2.7	3.8	5.2	3.4
2018	2.9	3.3	2.6	3.7	5.1	3.4
2019	2.8	3.1	2.5	3.4	4.8	3.2
2020	2.6	2.8	2.3	3.0	4.0	2.9
2021	2.9	3.1	2.3	3.3	4.4	3.2
2022	2.6	2.9	2.1	3.1	4.2	2.9
2023	2.4	2.6	1.9	2.8	4.0	2.7

C.29 The Department for Energy Security and Net Zero produced the following consumption figures for the WLWP area in 2023 **[See reference 50]**:

- **Electricity** – a total of 556.7 kilo tonnes of oil equivalent (ktoe) predominantly through industrial and commercial use;
- **Petroleum** – a total of 649.3ktoe predominantly through road transport;
- **Bioenergy and wastes** – a total of 62.9ktoe, predominantly through road transport;
- **Coal** – a total of 0.5 ktoe predominantly through domestic use;
- **Manufactured fuels** – a total of 3.2ktoe predominantly through domestic use; and,
- **Gas** – a total of 899.5ktoe predominantly through domestic use.

C.30 Between 2005 and 2023 the total reported energy consumption (all fuels) for London fell from 14,681.4 to 11,027.2.2ktoe. The changes in consumption by type are shown in **Tables C.3-C.9.** Tables for energy consumption for each borough are shown in turn.

Table C.3: Energy Consumption in London by type - 2005 to 2023

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2023)	Percentage change
Coal	53.7	20.8	61% decrease
Manufactured fuels	22.9	14.5	37% decrease
Petroleum	4,094.7	3,003.4	27% decrease
Gas	6,865.8	4,725.5	31% decrease
Electricity	3,562.8	2,978.7	16% decrease
Bioenergy and wastes	81.7	284.3	248% increase
Total	**14,681.6**	**11027.2**	**25% decrease**

Table C.4: Energy Consumption in Brent - 2005 to 2023

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2023)	Percentage change
Coal	2.3	0.9	61% decrease
Manufactured fuels	0.6	0.5	17% decrease
Petroleum	116.4	88.8	24% decrease
Gas	227.3	168.4	26% decrease
Electricity	104.9	96.3	8% decrease
Bioenergy and wastes	2.8	9.6	243% increase
Total	**454.3**	**364.5**	**20% decrease**

Table C.5: Energy Consumption in Ealing - 2005 to 2023

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2023)	Percentage change
Coal	2.5	1.1	56% decrease
Manufactured fuels	0.8	0.6	25% decrease
Petroleum	170.4	119.8	30% decrease
Gas	259.9	183.9	29% decrease
Electricity	114.4	117.2	2% increase
Bioenergy and wastes	3.3	11.7	255% increase
Total	**551.3**	**434.3**	**20% decrease**

Table C.6: Energy Consumption in Harrow - 2005 to 2023

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2023)	Percentage Change
Coal	1.2	0.4	67% decrease
Manufactured fuels	0.5	0.4	20% decrease
Petroleum	68.7	52	24% decrease
Gas	210.9	130.1	38% decrease
Electricity	59.2	44.2	25% decrease
Bioenergy and wastes	2.2	6.1	177% increase
Total	**342.7**	**233.2**	**32% decrease**

Table C.7: Energy Consumption in Hounslow - 2005 to 2023

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2023)	Percentage Change
Coal	1.6	0.7	56% decrease
Manufactured fuels	0.8	0.8	No change
Petroleum	155.6	117.6	24% decrease
Gas	203.9	135.8	33% decrease
Electricity	115.5	100.4	13% decrease
Bioenergy and wastes	2.6	11	323% increase
Total	**480**	**366.3**	**24% decrease**

Table C.8: Energy Consumption in Hillingdon - 2005 to 2023

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2023)	Percentage Change
Coal	2.1	1.3	38% decrease
Manufactured fuels	0.7	0.6	14% decrease
Petroleum	242	206.9	45% decrease
Gas	304.7	167.6	45.3% decrease
Electricity	153.6	148.6	3% decrease
Bioenergy and wastes	9.4	16.7	78% increase
Total	**712.5**	**541.7**	**24% decrease**

Table C.9: Energy Consumption in Richmond - 2005 to 2023

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2023)	Percentage Change
Coal	1.1	0.6	45% decrease
Manufactured fuels	0.3	0.3	No change
Petroleum	84.8	64.2	24% decrease
Gas	175.2	113.7	35% decrease
Electricity	68.1	50	27% decrease
Bioenergy and wastes	2.0	7.8	290% increase
Total	**331.5**	**236.6**	**29% decrease**

C.31 The Tyndall Centre for Climate Change Research has undertaken work to calculate the 'fair' contribution of local authorities towards the Paris Climate Change Agreement. Based on the analysis undertaken the following recommendations have been made for London **[See reference** 51**]**:

- Stay within a maximum cumulative carbon dioxide emissions budget of 203.5 million tonnes ($MtCO_2$) for the period of 2020 to 2100. At 2017 CO_2 emission levels, London would use this entire budget within 7 years from 2020.
- Initiate an immediate programme of CO_2 mitigation to deliver cuts in emissions averaging a minimum of -12.2% per year to deliver a Paris aligned carbon budget. These annual reductions in emissions require national and local action and could be part of a wider collaboration with other local authorities.
- Reach zero or near zero carbon no later than 2043. The Tyndall Centre report provides an indicative CO_2 reduction pathway that stays within the recommended maximum carbon budget of 203.5 $MtCO_2$. At 2043 5% of the budget remains. This represents very low levels of residual CO_2 emissions by this time, or the Authority may opt to forgo these residual emissions and cut emissions to zero at this point. Earlier years for

reaching zero CO_2 emissions are also within the recommended budget, provided that interim budgets with lower cumulative CO_2 emissions are also adopted.

C.32 Given the trends in carbon emissions and energy consumption at both national and local level, carbon emissions in London and each of the Boroughs within the WLWP area, are likely to continue declining.

Road travel and associated energy consumption

C.33 CO_2 emissions in the UK are provisionally estimated to have increased by 6.3% in 2021 from 2020, to 341.5 million tonnes (Mt), however compared to 2019, the most recent pre-pandemic year, 2025 CO_2 emissions are up by 6.95% at 367 Mt since 2019 **[See reference 52] [See reference 53]**. The increase in 2021 is primarily due to the increase in the use of road transport as nationwide lockdowns were eased. CO_2 emissions from transport rose 10.0% in 2021, accounting for almost half of the overall increase from 2020 **[See reference 54]**.

C.34 The overall road energy consumption in London decreased between 2005 and 2023 from 3,072.4 kilo tonnes of equivalent oil (ktoe) to 2,436.6ktoe. This change was most influenced by the decreasing energy consumption for personal road travel which fell during this period from 2,373.7ktoe to 1,737.7ktoe, potentially attributable to increasing use of electric vehicles (EVs). During this period energy consumption recorded in London for freight uses grew from 698.7ktoe to 698.8ktoe. This growth is due to an increase in outer London, which grew from 448.2ktoe to 491.5ktoe, whilst inner London saw a decrease from 250.5ktoe to 207.3ktoe **[See reference 55]**.

C.35 Recent trends across the UK indicate that diesel consumption excluding biodiesel fell in 2018 for the first time since 2009. The trend is due in part to a slowing of growth in the diesel vehicle fleet following sharp drops in new

registrations as well as increased efficiencies. It is expected that the UK will diversify in road transport to include more electric, hybrid and ultra-low emissions vehicles in the coming years **[See reference 56]**.

C.36 The WLWP area benefits from strong transport links and connectivity to Central and Greater London, as well as neighbouring areas such as Berkshire, Buckinghamshire and Surrey. This connectivity will be further enhanced with new sub-regional and national rail connections. The area is well-served by a significant road network, including the A4, A40, A406 and the M4, with convenient access to the M25 and M3.

C.37 Growth in traffic levels may occur in London because of projected population growth and associated development needs. The UK Government aims to ban the sale of new petrol and diesel cars by 2030 **[See reference 57]** which will progressively cut carbon emissions from transport across the UK as fossil fuelled vehicles are replaced with other lower emission vehicles. While the full effect of this will not be seen immediately as people continue to use their existing fossil fuelled vehicles, the market share of electric cars in the UK is already significant and likely to continue to grow rapidly.

C.38 With much of the waste transport in West London occurring by road, there is a need to shift more waste transport to rail or even water-based modes if possible, although with no safeguarded wharves in West London **[See reference 58]**, this is not likely to be feasible in the short term. However, transitioning the waste collection fleet towards EV would also help to reduce waste transport related emissions.

Renewable and low carbon energy

C.39 The National Statistics publication Energy Trends produced by the Department for Business, Energy and Industrial Strategy (now by Department for Energy Security and Net Zero, Department for Science, Innovation and Technology, and Department for Business and Trade), includes data

concerning renewable electricity generation, capacity and number of sites at Borough level between 2014 and 2024 **[See reference 59]**.

- In Brent capacity increased from 2.1 MW in 2014 to 11.4 MW in 2024, providing 7,890 MWh of electricity generation in 2024.
- In Ealing capacity increased from 3.4 MW in 2014 to 16.5 MW in 2024, providing 11,503 MWh of electricity generation in 2024.
- In Harrow capacity increased from 1.9 MW in 2014 to 9.6 MW in 2024, providing 6,798 MWh of electricity generation in 2024.
- In Hounslow capacity increased from 11.5 MW in 2014 to 22.8 MW in 2024, providing 11,509 MWh of electricity generation in 2024.
- In Hillingdon capacity increased from 4.3 MW in 2014 to 15.5 MW in 2024, providing 9,616 MWh of electricity generation in 2024.
- In Richmond upon Thames capacity increased from 1.7 MW in 2014 to 8.5 MW in 2024, providing 5,977 MWh of electricity generation in 2024.

C.40 It is clear from the above that capacity to generate renewable and low carbon sources of energy has increased significantly in west London over the past decade. It is considered there is scope to increase capacity further by deploying a range of technology types such as air and ground source heat pumps and solar panels. In addition, there is potential for waste management technologies to supply lower carbon energy.

Flood Risk

C.41 The UK Climate Projections (UKCP18) predicts that by 2070, under a high emission scenario, average winter precipitation is projected to increase, whilst average summer rainfall is projected to decrease. Although summer rainfall is projected to decrease, there will be an increased frequency of short-lived high intensity showers **[See reference 60]**.

C.42 All areas within the WLWP will become more vulnerable to fluvial flooding and surface water flooding as the local climate continues to change. The Thames Tidal Defences provides some protection to the WLWP area. A network of tidal flood defences provides a very high standard of protection in the Thames Estuary. The network includes:

- 330 kilometres (km) of walls and embankments;
- nine major barriers and gates, including the Thames Barrier; and
- over 400 other structures (including flood gates, outfalls and pumps).

C.43 Figure C.1 at the end of this Appendix illustrates the main areas of the WLWP exposed to flood risk.

C.44 Since becoming operational, the Thames Barrier has closed more frequently than originally planner for, as it has widened its remit and now helps manage fluvial flooding to areas upstream of Teddington Weir. The Environment Agency (EA) and Surrey County Council are jointly delivering the River Thames Scheme which focuses exclusively on fluvial flood risk upstream of Teddington Weir. The Thames Estuary 2100 Plan focuses primarily on tidal flood risk downstream of Teddington. There is a group of West London communities that will be impacted by the changes to Thames Barrier closures from 2035 onwards and for these communities the EA has established a separate project to investigate and deliver flood risk management measures to mitigate the change in risk. The EA is delivering the 'West London Communities' project as part of the Thames Estuary 2100 Plan **[See reference 61]**.

C.45 Local flood risk assessments are summarised for each local planning authority below:

- Brent: From the historical incidence of flooding, Brent has a low to moderate flood risk. The key flood risk to Brent is from surface water flooding. Surface water flooding occurs when the volume and intensity of a rainfall event exceeds the capacity of the sewer system, the responsibility for which lies with Thames Water, plus highway drains. Brent also has a small risk of groundwater flooding which occurs when the water table rises

to ground level and inundates low lying areas. If there was a breach in the Welsh Harp Reservoir, the effects would be severe; however, the risk of this happening is low. Responsibility for maintaining the Welsh Harp Reservoir lies with the Canals & River Trust. There is a risk of fluvial flooding from the River Brent and Wealdstone Brook. Brent is at no risk of flooding from the sea **[See reference 62]**.

- Ealing: The Borough is generally considered to have a low overall risk of flooding. However, certain localised areas are more susceptible. The primary source of river flood risk within the borough is the River Brent. Other significant watercourses include the Osterley Park Boundary Stream and the Yeading Brook, which runs along the Borough's boundary with Hillingdon. Smaller watercourses also pose a flood risk and have the potential to cause disruption or damage to property and infrastructure. Among the Borough's 'ordinary watercourses' are Costons Brook, Dormers Wells Stream, and Northolt Brook, alongside various smaller ditches. Costons Brook has been largely culverted due to development, significantly reducing the risk of flooding from this watercourse **[See reference 63]**.
- Harrow: Although Harrow as a borough has a relatively low susceptibility to surface water flooding, complex interactions exist between the pluvial (surface water), fluvial (river) and sewer systems which may increase the flood risk **[See reference 64]**.
- Hounslow: Hounslow is at risk of flooding from multiple sources including tidal (caused by surges in the Thames Estuary), fluvial (from other rivers, such as the rivers Brent and Crane) and surface water, sewers, and groundwater. The risk of tidal flooding In Hounslow is relatively low due to the presence of the Thames Tidal Defences (TTD) which have been established downstream of the borough **[See reference 65]**
- Hillingdon: Hillingdon faces a range of flood risks, primarily from surface water, rivers, groundwater and artificial water bodies. River flooding, or fluvial flooding, is a risk along the Borough's principal watercourses, including the River Colne, River Crane, and River Pinn **[See reference 66]**.
- Richmond upon Thames: Richmond is at risk of flooding from multiple sources including tidal (caused by surges in the Thames Estuary), fluvial

(from other rivers, such as Beverly Brook and the River Crane) and surface water, sewers, and groundwater **[See reference 67]**.

- OPDC: Overall, flood risk to the OPDC is relatively low for the majority of flood risk sources. Only a small area of the site, to the north west of Park Royal is affected by fluvial flooding associated with the River Brent. Existing property is currently not located within this area of fluvial flood risk. The main source of flood risk directly affecting the Opportunity Area is surface water flooding **[See reference 68]**.

C.46 As previously outlined in the 'climate change predictions' section of this chapter, the climate in London is expected to change, presenting a series of risks. These include wetter winters, more intense rainfall events and more frequent storms and floods, leading to increased damage to property and infrastructure and significant economic costs. The Environment Agency has provided 'local flood risk assessments: climate change allowances' **[See reference 69]** indicating climate change impacts on peak rainfall intensity and peak river flows.

Implications for health

C.47 Climate change has potential for substantial implications on human health, including:

- Disruption to health, social care, emergency management and waste collection services and schools' provision, from flooding, heatwaves and storms.
- Flooding poses multiple risks to people's health, such as heart attacks, trauma, an increase in waterborne infectious diseases, and common mental and post-traumatic stress disorders. Damage to water and sanitation infrastructure can further reinforce the adverse effects on health.

Population, health and wellbeing

Population

C.48 In England, more than one in six people (18.4%) were aged 65 years and over on Census Day in 2021. This is an increase of 20.1% since 2011. This is a higher percentage than ever before and contrasts with the increasing amounts of younger people in London. On average in London, the largest age group in 2011 was those aged 25 to 29 years **[See reference 70]**. More recently, in 2023, the largest age group in Inner London was those aged 25 to 29 years, while in Outer London, it was 35 to 39 years **[See reference 71]**.

C.49 Within West London, Richmond upon Thames has seen the largest increase in residents aged 65 and over, with an increase of 16%, followed by Harrow at 15.4%, Hillingdon with 13.4%, Ealing at 12.1%, and Hounslow with 11.8%. Brent has seen the smallest increase in this age group, with an increase of 11.6% between 2011 and 2021 **[See reference 72]**.

C.50 Since 2011, Hounslow's population has grown by 13.5%, the largest increase among West London boroughs. Hillingdon follows with an 11.7% rise, then Harrow (9.3%), Brent (9.2%), Ealing (8.5%), and Richmond upon Thames (4.4%). With the exception of Richmond upon Thames, these growth rates exceed London's overall increase of 7.7%. **Table C.10** presents the most recent (2021) population changes for Brent, Ealing, Harrow, Hounslow, Hillingdon, Richmond upon Thames **[See reference 73].**

C.51 As of 2021, Richmond upon Thames is the fourth least densely populated local authority area in London, with a population density of 3,401 people per km² **[See reference 74]**. Hillingdon follows closely as the third least densely populated, with 2,644 people per km². In contrast, Hounslow has a higher population density of 5,147 people per km², while Brent has 7,860 people per km², Ealing has 6,612 people per km², and Harrow has 5,176 people per km² **[See reference 75]**.

Table C.10: Population change in the WLWP area from 2011-2021

Area	2011 Census	2021 Census	Percentage Change
Brent	311,200	339,800	9.2% increase
Ealing	338,400	367,100	8.5% increase
Harrow	239,100	261,200	9.2% increase
Hounslow	254,000	288,200	13.5% increase
Hillingdon	273,900	305,900	11.7% increase
Richmond upon Thames	187,000	195,300	4.4% increase
Total	**1,603,600**	**1,757,500**	**9.6% increase**

C.52 In relation to the Old Oak and Park Royal Development Corporation (OPDC) which covers parts of the London Boroughs of Hammersmith and Fulham, Ealing, and Brent, the most recent population of the OPDC itself is 12,784 as of 2020, marking a 19% increase from 10,699 people in 2011 **[See reference 76] [See reference 77]**. This reflects the ongoing development and regeneration of the area as it transforms into a new urban district with new housing, infrastructure, and amenities.

C.53 Each of the boroughs' populations have grown over the last decade, and it is predicted that each of the boroughs' populations will continue to grow. The London Plan predicts that the population of London is projected to increase by 70,000 every year, reaching 10.8 million in 2041, and West London will play a large role in providing for this growth **[See reference 78]**. The London Plan also states that over a fifth of London's population is under 16, but over the coming decades the number of Londoners aged 65 or over is projected to increase by 90%. This is reflected in the high growth of those that are over 65 in each borough over the past decade, and it is predicted that this trend will continue.

C.54 As the population grows so do the boroughs' respective population densities. On average, the six Boroughs of West London, excluding the local planning authority of the OPDC have a lower population density (5,140 people per km²) than the London average of 5,690 people per km² **[See reference 79]**. The greater the population density the greater the challenge to ensure that each boroughs' communities have the quality of life, facilities and services and infrastructure they need, including public and private open space. However, increased population density can have both positive and negative effects in sustainable development terms, depending upon how new development is designed and delivered.

Housing

C.55 The housing targets in the London Plan (2021) for the period 2019/20 to 2028/29 are based on the 2017 London Strategic Housing Land Availability Assessment (SHLAA) **[See reference 80]**. These targets include Brent (23,250), Ealing (21,570), Harrow (8,020), Hounslow (17,820), Hillingdon (10,830), Richmond (4,110), and the OPDC (13,670).

C.56 The GLA's residential completions dashboard demonstrates that London is falling behind its housing completion targets. As a whole, London has failed to reach its housing delivery targets for the last seven years, although delivery did reach 120% in 2015/16. Since then, the average percentage of completions of target across London is 90%. The year 2024/25 achieved just 63% of its target to 52,287 homes **[See reference 81]**.

C.57 To date, Brent has achieved 11,210 completions since 2019/20, Ealing has achieved 9,389, Harrow has achieved 4,938, Hounslow has achieved 7,437, Hillingdon has achieved 5,331, Richmond upon Thames has achieved 968, and the OPDC has achieved 3,686 **[See reference 82]**, although it should be noted that 7,789 homes have been approved and over 4,300 homes have been completed since the inception of the OPDC in 2015 **[See reference 83]**. Only Harrow out of the six Boroughs, including the planning authority OPDC, have achieved their target housing delivery goal for over five years, although

this can partly be attributed to the COVID-19 pandemic and wider changes in the economic landscape of the built environment.

C.58 Through the changes to the NPPF in December 2024, the government has set out new national requirements for the number of homes to be delivered across England. Over the ten-year period of the next London Plan, the government has said the housing need in London is 880,000 new homes, which is over double the current rate of housebuilding across London **[See reference 84]**. Delivering the required new homes across London will contribute to construction, demolition and excavation waste arisings, along with increases in household waste to be managed.

Health

C.59 Health is a cross-cutting topic and as such many topic areas explored in this Scoping Report influence health either directly or indirectly.

C.60 The Office of National Statistics (ONS) have created an index that gives every local area in England an overall health score for each of the past six years. This overall score is made up of measures in different categories, called domains and subdomains. These measures include physical and mental health conditions like diabetes or anxiety, local unemployment, road safety, and behaviours like healthy eating **[See reference 85]**.

C.61 This score can show whether health in a local area is improving. The Health Index score has a baseline of 100, which represents England's health in 2015. A score higher than 100 means that an area has better health for that measure than was average in 2015, lower than 100 means worse health than the 2015 average. In 2021, the six West London Boroughs scores were as follows:

- Brent – 101.8
- Ealing – 107.0
- Harrow – 110.1

- Hounslow – 101.1
- Hillingdon – 103.2
- Richmond upon Thames – 118.6

C.62 Data is not available regarding the Health Index score in relation to the Old Oak and Park Royal Development Corporation area.

Waste crime

C.63 Waste crime encompasses fly-tipping, illegal waste sites, illegal waste exports, the misdescription of waste and illegal waste dumping, among other illegal waste-related activities. If not handled properly, waste can cause serious pollution of the environment – air, land and water, which can also be harmful to health. Waste crime also reduces the availability of resources from waste that could otherwise be recovered and reused.

C.64 Current data reported for the 25 Year Environment Plan include illegal waste sites and fly-tipping. The reporting on the indicator J6 on Waste Crime shows the total number of illegal waste sites in England has risen and fallen between a highest number of 1,011 active sites in 2011/2012 year to 556 in 2013/2014, reaching 685 sites in 2018/2019, before falling again to 344 sites in 2023/2024. The total number of fly-tipping incidents reported in England in 2018/2019 was 957,000. In the 5 years to 2023/2024, this total increased by 20.4% to 1.15 million incidents. **[See reference 86]**.

C.65 In the WLWP authority areas, the number of fly-tipping incidents reported is shown in Table C.11Error! Reference source not found., with a total of 98,241, which is approximately 22% of the total number for London (444,519). Brent and Hounslow reported the most incidents with about 27,000 (or 6% of the London total) each **[See reference 87]**.

Table C.11: Fly-tipping incidents reported by local authorities in WLWP area 2024/2025

Borough	Number of fly-tipping incidents
Brent	27,023
Ealing	16,828
Harrow	12,609
Hillingdon	10,099
Hounslow	27,241
Richmond upon Thames	4,441

Deprivation

C.66 Poverty impacts upon entire families and has significant impacts on health, education, skills and life chances. Efforts to lift people out of poverty is a challenge, especially as it is linked to so many other factors such as income levels, cost of living and family size. It has also been observed that many communities experiencing more waste crime are often the most economically and socially disadvantaged **[See reference 88]**. The Indices of Multiple Deprivation (IMD) 2025 **[See reference 89]** provide comparison data down to the postcode level. **Figure C.2** at the end of this Appendix shows the IMD data across the WLWP area, which shows there are disparities in the level of deprivation across all seven authorities and within each authority (at the Lower Super Output Area level). A summary is provided below for each LPA:

- Brent is 1.5 times more income-deprived than the average in London. Compared to the rest of England, Brent is 2 times more income-deprived, indicating that the borough experiences greater income deprivation than the national average **[See reference 90]**. The local authority area ranked 22nd out of 296 local authorities in 2025, placing it within the 7% most income-deprived local authorities in England.
- In Ealing, the income deprivation rate is 1.2 times higher than the London average, although is 1.6 times more income-deprived than the average in

the rest of England. The local authority area ranked 45th out of 296 local authorities in 2025, placing it within the 15% most income-deprived local authorities in England.

- Harrow is on average less income-deprived in comparison to London, with a relative deprivation ratio of 0.85, although is 1.2 times more income-deprived than the average in the rest of England. The local authority area ranked 153th out of 296 local authorities in 2025, placing it within the 52% most income-deprived local authorities in England.
- In Hounslow the income deprivation rate is 1.1 times higher than London as a whole, with a relative deprivation ratio of 0.96, although the local authority is 1.5 times more income-deprived than the average in the rest of England. The local authority area ranked 49th out of 296 local authorities in 2025, placing it within the 17% most income-deprived local authorities in England.
- Hillingdon is on average less income-deprived in comparison to London, with a relative deprivation ratio of 0.9, although the local authority is 1.2 times more income-deprived than the average in the rest of England. The local authority area ranked 116th out of 296 local authorities in 2025, placing it within the 39% most income-deprived local authorities in England.
- Richmond upon Thames is on average the least income-deprived in comparison to London, with a relative deprivation ration of 0.4, and also less income-deprived (0.6) than the average in the rest of England. The local authority area ranked 282nd out of 296 local authorities in 2019, placing it within the 5% least income-deprived local authorities in England.
- Within the OPDC area, deprivation levels are high, with the IMD in 2015 ranking it among the top 20% of the most deprived areas in London **[See reference 91]**. OPDC's more immediate context contains some of the most deprived areas in the country. Locations such as Harlesden and Stonebridge are ranked within the top 10% most deprived wards nationally and have issues with income deprivation and health **[See reference 92]**.

Equalities

C.67 The Equality Act 2010 identifies nine 'protected characteristics' and seeks to protect people from discrimination based on these characteristics. It presents three main duties: to eliminate discrimination, harassment, victimisation and other conduct that is prohibited under the Act; to advance equality of opportunity and to foster good relations between persons who share relevant protected characteristics and persons who do not share it. The nine protected characteristics identified through the Act are:

- Age: Children (0-4), Younger people (aged 16-24), older people (aged 65 and over);
- Disability: Disabled people, people with physical and mental impairment;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief;
- Sex; and
- Sexual orientation.

C.68 Many of the West London waste planning authorities also recognise care experience and socio-economic status as protected characteristics. Data regarding the population groups including some of these protected characteristics is collected through the 2021 UK Census **[See reference 93]**. In summary, the data suggests that in general, West London has a younger than the London average population, greater ethnic and religious diversity, a slightly higher marriage and total fertility rate and similar percentages of males and females. One of the boroughs, Brent, has the second-highest proportion of adults identifying as transgender in England and Wales, while Richmond upon Thames has the second smallest proportion of adults identifying as transgender

in London. Apart from the age population trends, it is difficult to predict how rates within these other population groups may change in the future.

Economy

Economy and employment

C.69 London is an international city which has established itself as a major centre of economic activity, with the city centre contributing approximately 11% of the UK's economy. As measured by Gross Value Added (GVA)(balanced), London's total economic output was worth around £577 billion in 2023, 59.2% higher than in 2013. In 20123, London accounted for 24% of the UK's total GVA, up from 18.9% in 1997 **[See reference 94]**.

C.70 While historic areas such as the West End and the Square Mile remain key, significant new clusters of growth in London have emerged at Canary Wharf, King's Cross, Old Street, Battersea, Stratford and Hackney Wick. Outer London centres such as Croydon, Ealing, and Kingston also host significant commercial activity. London's next phase of growth will continue this trend, with major new commercial and industrial developments outside the city centre, including Old Oak and Park Royal within the WLWP area, Royal Docks, Earls Court, Brent Cross Town, Meridian Water, Barking and Dagenham **[See reference 95]**.

C.71 Between 1971 and 2024, the total number of jobs in London has increased by 1.2 million **[See reference** 96**]**. The professional, scientific and technical activities sector accounts for the largest number of jobs, at 820,000 (or 15%) Compared to the wider UK, London is specialised (in terms of jobs) in both the information and communications sector and the financial and insurance activities sector. This sector is the largest in London, generating approximately £75 billion of GVA and accounting for 19.5% of London's total economic output . Within these broad sectors there are a large number of significant subsectors of particular specialisation within London. In addition to this specialisation, there

are significant levels of employment in a number of broad sectors – making for quite a diverse economic structure. The spatial make-up of London's economy shows that different sectors are important to different boroughs. The financial and insurance activities sector accounts for approximately two-thirds of total economic activity in the City of London; whereas Hillingdon has the greatest proportional share of the distribution, transport, accommodation and food services, with its strategic growth location around Heathrow Airport. Brent has a large proportional share of the production industries, while Harrow has the greatest proportional share of local authority output from construction activities within London **[See reference** 97**].**

C.72 In Brent, Harrow, and Hillingdon, the largest percentage of residents aged 16 and over (33.2, 32.5 ,25.8, and 24.9% respectively) are employed in the public administration, education and health sector. In Ealing, Richmond upon Thames and Hounslow the largest employment sector is banking, finance and insurance, employing 28.7%, 31.4% and 25.5% respectively in 2024 **[See reference 98]**. In the OPDC area, the most prevalent occupational group is professional occupations (24%) **[See reference 99]**. The employment patterns in these boroughs reflect the sectorial priorities identified in the London Growth Plan, which focus on finance, professional, and business services as priority sectors **[See reference 100]**. It is uncertain how much the waste management sector contributes to employment within West London.

C.73 Across London in the year ending December 2025 79.9% of people aged 16 to 64 years were employed. This means that Harrow, Hillingdon, Hounslow, Brent, and Richmond upon Thames and OPDC are below the London average, with 79.8%, 74%, 77.5%, 76.1%, 79.3% and 67% (in February 2024) respectively while Ealing is above the London average, with a rate of 84.4%. Across London in the year ending December 2025, 6.1% of people aged 16 to 64 years were unemployed. This means that Richmond upon Thames (8.4%), Ealing (8.8%) Hillingdon (7.1%), Brent (6.9%) and OPDC (6.3%in February 2024) all have a higher unemployment rate than the London average. Hounslow and Harrow had no recent available unemployment data to support this. **[See reference 101] [See reference 102]**.

Growth Areas

C.74 The London Plan 2021 identifies Opportunity Areas (OA) which are defined as "*London's principal opportunities for accommodating large scale development to provide substantial numbers of new employment and housing, each typically more than 5,000 jobs and/or 2,500 homes, with a mixed and intensive use of land and assisted by good public transport accessibility.*" Policy SD1 of the London Plan focuses on these areas and how they can be used to support growth in London. The OA's named in the London Plan that include West London sites are Highspeed 2/Thameslink and Heathrow/Elizabeth Line West **[See reference 2]**.

C.75 The Inclusive Growth Strategy (IGS) for Brent 2019-2040 is a long-term strategy that identifies choices available to meet the challenges and seize the opportunities of growth over the next 20 years **[See reference 103]**. The Brent Local Plan (2019) which was adopted in February 2022 **[See reference 104]** identifies the following areas for economic growth for the period between 2019 and 2041:

- Wembley
- Neasden Stations
- Staples Corner
- Burnt Oak and Colindale
- Northwick Park
- Church End
- South Kilburn
- Alperton

C.76 Ealing has one of the largest concentrations of industrial floorspace in London, with large areas of Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS). With some of the UK's biggest infrastructure hubs on its doorstep, including Heathrow and Old Oak Common, Ealing offers

increased opportunities for economic and investment growth to build on the development of High Speed 2 and the new Elizabeth Line stations **[See reference 105]**. The adopted Local Plan sets out how historic growth has been focussed on Acton, Ealing, and Southall, and the new Local Plan will seek to balance future investment across the whole Borough, including Hanwell, Greenford, Northolt and Perivale. Southall has been designated an Opportunity Area within the London Plan (2021) and is entirely within Ealing. Old Oak Common and Park Royal Estate is partly within Ealing and falls under the responsibility of the OPDC.

C.77 Harrow's Local Plan 2021-2041 **[See reference 106]** incorporates the concept of 'Good Growth,' which underpins the London Plan. This is focussed on ensuring that future growth within London and its boroughs is socially and economically inclusive and environmentally sustainable. The Harrow Local Plan seeks to direct much of that development to the most sustainable and central locations such as the Harrow and Wealdstone Opportunity Area, designated in the London Plan 2021.

C.78 The Hillingdon Local Plan Part 2 Development Management Policies and Site Allocations and Designations were adopted as part of the Borough's development plan in January 2020. The Site Allocations and Designations Document **[See reference 107]** identifies key growth areas in the Borough, noting the inclusion of the Heathrow Opportunity Area and Hayes Opportunity Area which is consistent the London Plan (2021):

- Uxbridge
- Heathrow Airport
- Heathrow Opportunity Area
- Hayes/West Drayton
- Hayes Housing Zone/ Opportunity Area

C.79 In 2024 Hounslow Council launched 'Opportunity Hounslow, Gateway to London and the world' **[See reference 108]** setting out the Borough's aspirations for Hounslow, Chiswick, Brentford and Feltham. The Hounslow

Local Plan 2015-2030 **[See reference 109]** notes that the Great West Corridor plays a greater than sub-regional role in the digital and media sector and will be one of the main areas of focus for economic development within the borough. The Hounslow Local Plan also identifies the Heathrow Opportunity Area (shared with London Borough of Hillingdon) as an area to accommodate significant new housing and employment growth (particularly related to logistics and warehousing).

C.80 The London Borough of Richmond upon Thames Local Plan (2025) **[See reference 110]** seeks to direct development and growth to town centres: Richmond, Twickenham, Teddington, Whitton and East Sheen. The Local Plan notes that there is a large shortfall in industrial and office floorspace with very few opportunities to identify additional land to meet demands, due to the historic environment in the Borough and the large number of protected open spaces.

C.81 The Old Oak and Park Royal Development Corporation (OPDC) is securing the regeneration of the Old Oak and Park Royal Opportunity area, spanning land in three London boroughs: Ealing, Brent and Hammersmith & Fulham **[See reference 111]**. OPDC's Local Plan was adopted in 2022, sets out the development framework for the area. OPDC is now developing plans for Old Oak on land surrounding Old Oak Common Station, Willesden Junction and North Acton, to create an urban district.

Implications for health

C.82 Employment and job security influence mental health and levels of stress. Income can also influence physical health, in terms of the quality and location of housing that people can afford. A strong local economy will help create more job opportunities, contribute to greater job stability and raise the quality of life for local people, resulting in improved health outcomes.

Transport

C.83 Although there are no specific data sources for vehicle movements associated with waste development within West London, they are likely to be smaller than other for activities (such as commuting, shopping, leisure), and include not only the transport of waste itself from collection points to waste management facilities (either by householders or waste collection companies), but also commuting to and from work by waste facility employees.

C.84 The London Infrastructure Plan 2050: Transport Supporting Paper **[See reference 112]** notes that across London, trip rates are expected to remain constant on a per person basis, but that expected growth in population will require significant additional capacity across London's transport networks by 2050.

- **Brent:** The Brent Long Term Transport Strategy 2015-2035 (and 2022 Review) **[See reference 113]** aspires to provide a transport network which supports economic development and works to improve safety, accessibility and inclusivity in the borough whilst also mitigating, where possible, the negative impact of traffic growth.
- **Ealing:** The transport strategy and local implementation plan (LIP) set the Borough's transport priorities. It builds on the transport strategy which aims to improve the quality of life in the borough. The three plans covering cycling, parking and school travel set out the Borough's policies, projects and targets in more detail. **[See reference 114]**
- **Harrow:** The Draft Long Term Transport Strategy **[See reference 115]** has been developed to guide the future delivery of sustainable transport schemes by the Borough. The Strategy sets out sets out the vision for transport, the priority areas based on a robust evidence base, and an action plan of measures to help achieve the key objectives.
- **Hounslow:** The third Hounslow Local Implementation Plan (2018) **[See reference 116]** describes how the council will implement the Mayor's policies and proposals on a local level whilst responding to the unique challenges and opportunities present in the borough. The overarching aim

of the strategy is for 80% of all trips in London to be made on foot, by cycle or using public transport by 2041.

- **Hillingdon:** The third Local Implementation Plan (2019) **[See reference 117]** transport policies, programme and long-term aspirations address demands on the existing transport network to not only maintain the existing network but improve mobility and access to employment, retail and leisure opportunities. The target for Hillingdon is for 56% of all trips to be made on foot, by cycle or using public transport by 2041 in the Borough.
- **Richmond upon Thames:** The Local Implementation Plan **[See reference 118]** focused on the headline target for 75% of trips to be undertaken by sustainable modes (walking, cycling and public transport) by 2041, from a baseline of 61%. This target is supported by nine additional outcomes, covering three areas: healthy streets and active travel, a better public transport experience, and good growth.
- **Old Oak and Park Royal Development Corporation:** Given the significant growth at Old Oak, The Old Oak Strategic Transport Study (2018) **[See reference 119]** has three main interrelated tenets to enable the enable the maximum development and regeneration potential to be fulfilled:
  - Minimise highway congestion;
  - Address the significant severance; and
  - Maximise the potential of the proposed new HS2/Crossrail interchange

C.85 Figure C.3 at the end of this Appendix illustrates the main road, rail and cycling routes in the WLWP Area. Key highway routes within the WLWP area are subject to congestion during peak periods, not only in terms of absolute delays but also the unreliability of journey times.

C.86 At the time of Census 2021, UK government guidance and lockdown restrictions resulted in unprecedented changes to travel behaviour and patterns, with between one third and just over one half of residents working from home in 2021 in all five West London boroughs other than Brent (which had 14%). **[See**

reference 120]. The Census data also showed higher percentages of car use over public transport in all of the boroughs.

Implications for health

C.87 A lack of sustainable and active travel options can have negative impacts on public health whilst also increasing reliance on relatively expensive private motorised transit and exacerbating existing inequalities. Encouraging active travel, such as walking, wheeling and cycling can have a wide range of positive implications for health, including increased physical activity and opportunities for social interaction. In addition, an increase in active travel could be associated with a decrease in reliance on often expensive vehicular transport, and an associated decrease in air pollutants that can be harmful to human health.

Historic Environment

C.88 The historic environment can be considered a finite resource. It cannot be replaced and is susceptible to decline over time as historic features experience degradation and decay. However, cultural heritage can evolve and change, and features which are not currently considered a valued part of the historic environment may become so in the future, either due to their uniqueness, past use, or historic or cultural significance.

C.89 At the local level, new, expanded or re-developments, infrastructure and environmental pressures, such as extreme weather and flooding, present the greatest risk to cultural heritage assets.

C.90 Historic England has a Heritage at Risk Register **[See reference 121]** which includes historic buildings, listed buildings, sites and Conservation Areas at risk of being lost through neglect, deterioration or decay. The register aims to highlight those places and buildings in greatest need of repair. As of 2025, there are 604 heritage assets registered as at risk within wider London. There are 24 heritage assets registered at risk within Brent, 29 within Ealing and 14 in Harrow

respectively, 22 in Hounslow, 20 in Hillingdon, 27 in Richmond upon Thames, and 6 in OPDC.

C.91 Figures C.4a to **C.4f** at the end of this Appendix illustrate the historic environment assets for each of the boroughs as described below.

Brent

C.92 The adopted 2022 Brent Local Plan 2019 – 2041 **[See reference 122]** notes the importance of conserving and enhancing heritage and cultural assets as the borough continues to grow. As compared to many inner London boroughs, Brent has relatively few designated heritage assets, largely due to its significant development during the interwar period. The borough has:

- Just over 200 nationally listed buildings, a small number of archaeological sites and 22 Conservation Areas, which cover approximately 7% of the borough.
- Important cultural and heritage assets, which include the Grade I listed Old Parish Church of St Andrew and Grade II listed Sudbury Town Underground station, Oxgate Farm, and Wembley Arena along with a number of historic churches and areas of statutory listed land.
- Brent's cultural diversity is reflected in its notable places of worship, including the BAPS Shri Swaminarayan Mandir in Neasden and the Shree Sanatan Hindu Mandir on Ealing Road. While it has cultural landmarks and a vibrant nightlife in Wembley and Kilburn, its 2020 London Borough of Culture status was awarded primarily for its people and activities. However, cultural and creative spaces face significant financial challenges, difficulties finding new sites together with potential displacement from competing higher value land uses.
- There are six buildings on the Buildings at risk in the Risk Register and three churches at risk **[See reference 121]**.
- There are four Archaeological Priority Areas and 40 Sites of Archaeological Importance in Brent. **[See reference 123]**.

Ealing

C.93 The Regulation 19 Submission Local Plan for Ealing highlights the importance of placemaking, good growth, and good design to protect and enhance heritage assets, maximising their cultural, social, and economic benefits **[See reference 124]**. The borough contains a wealth of designated heritage assets, including:

- Over 300 listed buildings and structures.
- There are six Scheduled Monuments, four Registered Parks and Gardens and 29 Conservation Areas **[See reference 125]**.
- There are over 700 non-designated heritage assets identified in Ealing's local heritage register.
- Five of Ealing's Conservation Areas are currently on Historic England's Heritage at Risk Register due to the deterioration of certain areas **[See reference 126]**. These are:
  - Acton Town Centre is currently listed with its Condition being classed as 'Fair', Vulnerability as 'Medium', and Trend as 'Deteriorating.'
  - Cuckoo Estate is currently listed with its Condition described as 'Poor', Vulnerability as 'Medium' and Trend as 'Deteriorating'.
  - Ealing Town Centre is currently listed its Condition being classed as 'Fair, Vulnerability as 'Medium' and Trend as 'No significant Change'.
  - Haven Green is currently listed with its Condition being classed as 'Fair', Vulnerability as 'Medium' and Trend as 'Deteriorating.'
  - Norwood Green is currently identified in Historic England's Heritage at Risk Register with its condition described as 'Vey Bad', Vulnerability as 'Medium' and Trend as 'Deteriorating Significantly'.
- There are 23 Archaeological Priority Areas spread across the borough, which include Mill Hill Estate, Down Barns, and Manor Farm Road **[See reference 127]**.

Harrow

C.94 The Regulation 19 Submission Local Plan for Harrow 2021 – 2041 (adopted on the 24th March 2026) seeks to integrate heritage growth to ensure that development respects and enhances historic character **[See reference 128]**. The Plan also seeks to safeguard listed buildings and locally significant heritage sites from inappropriate alterations or demolitions. The borough contains a wide variety of designated and undesignated heritage assets, which make a vital contribution to the local character of the borough:

- There are over 300 listed buildings in the borough, as well as four Registered Parks and Gardens), nine Scheduled Ancient Monuments, and 30 Conservation Areas.
- There are nine Archaeological Priority Areas in the borough **[See reference 129]**.

Hounslow

C.95 The Regulation 19 proposed submission of the Hounslow Local Plan 2020 – 2041 **[See reference 130]** notes the importance of protecting and enhancing natural and built heritage assets, and the distinctive established residential characters found across the borough. The rich and varied heritage of the borough include many important designated heritage assets:

- There are over 500 statutorily listed properties, both commercial and domestic.
- The borough also contains some of West London's remaining Great Estates at Chiswick, Gunnersbury, Boston Manor, Osterley and Syon, a unique and distinct aspect of the borough which contributes significantly to the environmental and cultural wealth of the borough.
- There are 28 Conservation Areas in the borough, which are mostly concentrated in the east of the borough, specifically in Chiswick, Brentford and Isleworth.

- The 2023 London Borough of Hounslow Archaeological Priority Areas (APA) appraisal **[See reference 131]** found a total of 28 Archaeological Priority Areas. This includes five Tier 1 APAs, twenty-one Tier 2 APAs and two Tier 3 APAs.
- Hounslow is home to 6 Scheduled Monuments, mostly located in the west of the borough.
- Hounslow maintains a Local List of non-designated heritage assets.

Hillingdon

C.96 The Local Plan Part 1 sets out the Borough's long-term spatial strategy, including policies on heritage conservation. With regard to heritage assets, including open spaces and historic buildings, which make an important contribution to our local identity, are safeguarded and enhanced in the Local Plan. Hillingdon contains:

- 409 statutory listed buildings, and 302 locally listed buildings. The borough also has five Scheduled Monuments. Among its notable heritage assets is Church Gardens in Harefield, a Grade II listed entry in the English Heritage Register of Historic Parks and Gardens. Furthermore, the borough enforces an Article 4 Direction at Daisy Cottages, West Drayton Green, providing extra protection to this historically significant site.
- There are 31 Conservation Areas, and 14 Areas of Special Local Character (ASLC) in the borough.
- There are 22 Archaeological Priority Areas within the borough of Hillingdon **[See reference 132]**.

Richmond upon Thames

C.97 The Richmond upon Thames Local Plan **[See reference 133]** notes the importance of protecting and enhancing key heritage assets, which contribute significantly to the distinctive character of the borough. The borough contains:

- Over 300 heritage assets across the borough.
- The borough comprises several wards with varying numbers of listed structures. For instance, South Richmond Ward has 181 listed buildings, whilst Kew Ward contains 84 listed buildings. Notably, the Royal Botanic Gardens, Kew, located within the borough, is one of only four World Heritage Sites in Greater London, further highlighting Richmond's historical and cultural significance.
- There are 85 Conservation Areas within the borough **[See reference 134]**.
- The 2023 London Borough of Richmond upon Thames Archaeological Priority Areas (APA) appraisal found a total of 31 Archaeological Priority Areas for Richmond, of which 7 are a Tier 1 APA, 24 are Tier 2 APAs, and 1 is a Tier 3 APA **[See reference 135]**.

Old Oak and Park Royal Development Corporation

C.98 The Old Oak and Park Royal Development Corporation Local Plan **[See reference 136]** recognises the area's rich social, cultural, and built heritage, shaped by its transformation from a rural landscape to an industrial hub. Heritage assets, both designated and non-designated, play a key role in placemaking and delivering social, economic, and environmental benefits. Key designated assets within or in close proximity to the OPDC include **[See reference 137]**:

- The Grand Union Canal, which runs through the Boroughs of Ealing, and Hammersmith & Fulham. These areas of the canal within the boroughs are designated Conservation Areas.
- Kensal Green Cemetery, a designated Conservation Area and Registered Park and Garden.
- St Mary's Catholic Cemetery, a designated Conservation Area.
- Kensal House and Day Nursery, which are both Grade II* listed.

C.99 On 27th February 2017 the OPDC designated the Cumberland Park Factory Conservation Area on Scrubs Lane **[See reference 138]**.

C.100 It should be noted that the OPDC is not responsible for the adjacent St. Mary's Conservation Area and Kensal Green Cemetery Grade I Listed Registered Park and Garden. However, they contain a number of heritage assets which are identified by Historic England to be at risk.

C.101 On 20th January 2020, OPDC adopted its Local Heritage Listings which identified 64 non-designated heritage assets **[See reference 139]**.

C.102 There are no known archaeological designations within Old Oak and Park Royal.

Implications for health

C.103 Historic England explored the links between the historic environment and health in Wellbeing and the Historic Environment **[See reference 140]**. This identified mental and social wellbeing benefits of the historic environment, including opportunities to meet people and expand knowledge through volunteering or visiting historic sites and giving people a sense of place, community and belonging.

Landscape and townscape

C.104 The National Character Map defines the WLWP area as lying within National Character Areas 111 – Northern Thames Basin and 115 – Thames Valley **[See reference 141]**.

C.105 The Northern Thames Basin area is a diverse mix of urban and rural landscapes. The rural and dispersed landscape adjacent to Essex becomes increasingly urban towards the centre of London. There is a mix of historic

settlement patterns, with remnants of historical orchards and other communal green and farmed spaces. Urban areas have low levels of tranquillity with pockets of perceived tranquillity. Moving westwards in the WLWP area, the landscape transitions to a more varied mix of suburban and rural areas. As it extends further, the built environment gradually gives way to larger green spaces, farmland, and historic market towns. Furthermore, tranquillity increases as green space and Green Belt areas increase.

C.106 The Thames Valley area is mainly a low-lying area, widening from Reading, which includes Slough, Windsor, the Colne Valley and the southwest London fringes. The River Thames provides a unifying feature through a very diverse landscape of urban and suburban settlements, infrastructure networks, fragmented agricultural land, historic parks, commons, woodland, reservoirs and extensive minerals workings. Towards London in the east, urban influences increasingly dominate the landscape, replacing the natural character of the area. This includes a dense network of roads (including the M25 corridor), Heathrow Airport, railway lines, golf courses, pylon lines, reservoirs, extensive mineral extraction and numerous flooded gravel pits. To the south, the open Thames flood plain dominates, with its associated flat grazing land, becoming characterised by a number of formal historic landscapes on higher ground. Between Hampton and Kew, the River Thames forms the focus of a series of designed landscapes.

C.107 Within the **Northern Thames Basin NCA**, drivers for change include:

- Continued urban expansion of settlements putting pressure on their landscape setting;
- Provision of new open space to improve health and wellbeing, which could lead to habitat fragmentation and an altered landscape character;
- Increased development of infrastructure (transport, logistics and industrial);
- Continued demand for minerals;
- Climate change will lead to increased wind erosion in hotter and drier periods and water erosion in the wetter, colder periods;

- Loss of brownfield sites in developed areas putting pressure on invertebrate habitats; and
- Decreased water availability with potential loss of specific drought intolerant species and water quality of water bodies.

C.108 Within the **Thames Valley NCA**, drivers for change include:

- Climate change will lead to increased wind erosion in hotter and drier periods and water erosion in the wetter, colder periods;
- The Thames Barrier is currently effective but may become unsustainable. Climate change could increase peak river flows by 20% and fluvial flows at Teddington by up to 40% by 2080;
- Drier summers and increasing temperatures, in relation to climate change, could lead to deterioration in the area's semi-natural wetland habitats, including ancient wet meadows and could also lead to lower river flows and increased demand for water resources;
- Continued urban expansion of settlements putting pressure on their landscape setting;
- Designed parkland features at risk from changing agricultural activities, development pressure and lack of management for individual trees;
- Increased development of infrastructure (transport, logistics and industrial) contributing to the overall fragmentation of the landscape;
- Continued demand for recreation opportunities from those living in the more urban parts of the NCA and Inner London, which could lead to habitat fragmentation and an altered landscape character.

C.109 The urban landscapes can be conserved by maintaining green spaces, landscaping and trees and implementing good design practices in new developments. Maintaining the rural landscape and natural landforms will be dependent on being able to preserve and conserve ancient woodlands, unimproved grasslands, protected lanes, commons and hedge-rowed field patterns, as well as the ridges and hilltops from inappropriately located or

designed development, changing agricultural practices and seasonal climate change.

Implications for health

C.110 The landscape can benefit mental health and wellbeing in providing a pleasant setting and identifying and enhancing local landscape contributes to sense of place and belonging. Sensitive landscape management can also improve social and physical health by encouraging physical recreation, including providing a pleasant environment for activities such as walking and cycling, providing good public access links and helping people to feel safe and confident in navigating landscapes.

Biodiversity and Geodiversity

C.111 Endangered species and habitats are protected through the compilation and delivery of Biodiversity Action Plans (BAPs) at national, regional and local levels. Priority Habitats and Species are regarded as the most important habitats and species that need to be conserved across the country.

C.112 At UK level, the publication of the State of Nature Report **[See reference 142]** provides an overview of the health of the country's wildlife and how human impacts are driving sweeping changes in the UK. It looks back over 50 years of monitoring to see how nature has changed since the 1970s, averaging a 19% decline in the average abundance of wildlife in the UK between 1970 and 2021, with key drivers for change being agricultural productivity, climate change and increasing average temperatures, overexploitation and hydrological changes. The report finds that on average, metrics suggest that decline in species abundance and distribution of species has continued in the UK throughout the most recent decade. These trends are likely to continue in the absence of concerted action.

C.113 Biodiversity net gain (BNG) is mandatory in England from February 2024 **[See reference 143]**. The NPPF emphasises that plans should identify and pursue opportunities for securing measurable net gains for biodiversity, and plans and decisions should minimise impacts and provide net gains for biodiversity. The statutory framework aims to ensure that developments will achieve at least a 10% gain in biodiversity value. The requirement will apply to most new planning applications within each authority, whether or not the requirement is captured within the adopted local plan.

C.114 The London Nature Recovery Strategy for London **[See reference** 144**]** sets out how and where nature recovery should be prioritised across the City. It sets out where in the City requires most urgent attention and what needs to be done to mitigate issues related to biodiversity and local habitats. The Strategy aims to reverse biodiversity decline with 6 overarching principles. This includes the following:

- To help people enjoy nature;
- Create bigger and better habitats that are more connected;
- Increase wildlife populations;
- Support a wide variety of pollinators and invertebrates;
- Support healthy soils; and
- Protect ecology from invasive species and disease.

The Strategy also includes a Local Habitat Map which highlights where measures could be made to support the biodiversity priorities. All of the West London Boroughs include potential measure locations, Areas of Particular Importance for Biodiversity (APIBs) and Areas that Could Become of particular importance (ACBs) for biodiversity priorities. Notably, Richmond and Bushey Park in Richmond, Ruislip Woods and Mid Colne Valley in Hillingdon are particularly larger areas in West London that have been highlighted in the London Nature Recovery Strategy.

C.115 The London Environment Strategy **[See reference 145]** includes policies and proposals that aim to ensure that more than half of London will be green by

2050 and the city's tree canopy cover increases by 10%. The Strategy aims to achieve this by:

- making it the first National Park City (achieved in 2019 **[See reference 146]**);
- working with others to expand and improve London's urban forest;
- highlighting the economic value of London's natural capital, and finding new ways to fund London's green infrastructure that recognise this value;
- providing guidance and support to help people manage and create habitats for wildlife and enhance London's biodiversity;
- making maps, data and research available to help others to make a case for and identify priorities for green infrastructure in their local area;
- including policies in the new London Plan to protect the green belt and our best wildlife habitats, and to ensure that new developments include enough urban greening; and,
- supporting communities and others to improve London's greenspaces and opportunities to enjoy nature through funding programmes.

C.116 The Strategy recognises that in the past, green spaces and biodiversity in London has deteriorated in size and quality and now faces many environmental challenges. One of the challenges identified is waste. The Strategy states that waste has a big impact on the biodiversity and the environment both locally and globally. Less than half of the 7m tonnes of waste that London's homes and businesses produce each year is currently recycled, and landfill capacity is set to run out by 2026. Plastic packaging not only litters London streets, but often finds its way into waterways and oceans, releasing toxic chemicals before breaking down – a process that can take centuries. London needs to reduce, reuse and recycle more, to see waste as the valuable resource that it is, and to reduce London's increasing waste bill as the city grows.

C.117 The WLWP authorities have a variety of national and locally designated nature conservation sites, as described below and illustrated on **Figure C.5** at the end of this Appendix.

Brent

C.118 There are a number of Grade I Sites of Importance for Nature Conservation (SINCs) of borough importance in Brent. These include Fryent Country Park, Brent Reservoir and Northwick Park and the Ducker Pool. There are also areas of Grade II SINC throughout the borough. Brent Reservoir (Welsh Harp), a nationally designated Site of Special Scientific Interest (SSSI), comprises 170 hectares of open water, marshes, trees and grassland, which provides a valuable habitat for wildlife. It is particularly significant for breeding wetland birds, notably great crested grebes, and supports a rich variety of marsh plant species. Although the SSSI is located on the border of the London Boroughs of Brent and Barnet, the majority of the site lies within Barnet **[See reference 147]**. The SSSI is currently assessed as being in a favourable condition. There are also three Local Nature Reserves including Fryent Country Park. **[See reference 148]**.

Ealing

C.119 There are 10 Local Nature Reserves (LNR) in Ealing, of which eight are owned and managed by the borough:

- Blondin Nature Area
- Fox Wood
- Grove Farm
- Gunnersbury Triangle (London Wildlife Trust)
- Islip Manor Meadows
- Litten Nature Reserve
- Long Wood
- Northolt Manor
- Perivale Wood (The Selborne Society)

- Yeading Brook Meadows

C.120 Yeading Brook Meadows, Islip Manor Meadows, Perivale Wood, and Gunnersbury Triangle are also designated SINCs of borough importance. Additionally, Horsenden Hill, another borough-important SINC in Ealing, and Regionally Important Geological and Geomorphological Site (RIGS), is recognised for its species-rich grassland meadows, ponds supporting Great Crested Newts, and areas of ancient woodland, whilst London's Canals, which cover boroughs including Brent, Ealing, Hillingdon, and Hounslow, support a variety of habitats, particularly in relation to West London, in and around the Brent River and Grand Union Canal. Due to their ecological significance, these waterways have been designated as a SINC of Metropolitan importance **[See reference 149]**.

C.121 The Ealing Regulation 19 Submission Local Plan aims to establish a green link and wildlife corridor at the Ealing Common Deposit site, which would connect the Green Corridor/Piccadilly and District Line SINC. This initiative presents an opportunity to enhance biodiversity through tree planting and soft landscaping **[See reference 150]**.

Harrow

C.122 There are 44 SINCs in the Borough of Harrow, covering 803.6 hectares, or 15.9% of the borough. Five are of Metropolitan Importance, six are of Borough Grade 1 importance, 14 are of Borough Grade II importance and 19 are of Local importance. The Bentley Priory Nature Reserve is both a SINC and an LNR and comprises the Borough's only SSSI. There are four LNRs in the Harrow **[See reference 151]**:

- Bentley Priory (59.25 ha)
- Stanmore Common (49.2 ha)
- Stanmore Country Park (30.75 ha)
- Roxbourne Rough (5.2 ha)

Hounslow

C.123 Hounslow's Nature Recovery Action Plan (NRAP) 2023 – 2028 **[See reference 152]** outlines the wildlife designations in the borough. With regard to international and national designated sites, the Southwest London Waterbodies Special Protection Area (SPA) and Ramsar site includes Kempton Park Reservoir, which lies in the south-west of Hounslow. The reservoir is also designated as part of the Kempton Park Reservoirs SSSI. These designations reflect overwintering wildfowl population, which is particularly successful due to its limited public access. The SSSI is assessed as being in 'unfavourable recovering' condition owing to infestation of the invasive New Zealand pygmyweed.

C.124 The Syon Park SSSI is also located in the borough of Hounslow and is the last remaining section of the River Thames within Greater London which is unbanked. This means that the meadows flood twice daily with the tide. The SSSI is recorded to be in favourable condition.

There are 10 LNRs in Hounslow, totalling 163ha. The network of SINCs spans the borough but trends toward the habitats associated with the Thames, Crane and Brent corridors, the western boundary (including Bedfont Lakes to Kempton Park), around Osterley Park in the north and Syon Park in the south. There is a total of 74 SINC sites in Hounslow.

Hillingdon

C.125 Hillingdon is one of the most biodiverse boroughs in London. The borough has a diverse range of habitats, including woodlands, scrublands, grasslands, wetlands, rivers, gardens, and parklands. These varied environments support a vast range of species, both common and protected. Hillingdon has six SSSIs, of which two are in unfavourable condition. These are Fray's Farm Meadows SSSI, and Harefield Pit SSSI **[See reference 153]**. The borough is home to one National Nature Reserve, Ruislip Woods, which is the largest expanse of ancient, semi-natural woodland in Greater London.

C.126 In addition, Hillingdon boasts a range of other protected areas, including four Local Nature Reserves (LNRs), 13 other nature reserves, and 14 Sites of Metropolitan Importance designated for their ecological value across London. The borough also features 15 Sites of Borough Grade I Importance, 25 Sites of Borough Grade II Importance, and 7 Sites of Local Importance, all contributing to its rich natural heritage. Furthermore, Hillingdon includes three Sites of Countryside Conservation Areas, reflecting a commitment to preserving local landscapes **[See reference 154].**

Richmond upon Thames

C.127 Richmond upon Thames is one of the richest boroughs in regard to the total area of green space, the quality and diversity of parks, open spaces, and conservation areas, as well as the wealth of different habitats and species these areas support, as many of the species are also important on a regional, national and international scale.

C.128 There are currently three SSSIs in the borough. These are Richmond Park SSSI, Bushy Park and Home Park SSSI, and WWT London Wetland Centre SSSI. All three of these SSSIs are in favourable condition **[See reference 155]**.

C.129 Additionally, there are ten SINCs of metropolitan importance in the borough, which include Ham Lands, Barnes Common, and Royal Botanical Gardens (RBG) Kew. RBG Kew is also a designated World Heritage Site, reflecting its diverse historic landscape, and rich architectural legacy. The London Borough of Richmond upon Thames also contains 50 SINCs of local importance **[See reference 156]**. The Local Plan has taken forward the recommendations from the Review of Sites of Importance for Nature Conservation (2021 and 2022), which includes new SINCS, the expansion of areas or removal of areas from existing SINCs, and a change in the SINC status, as well as the amalgamation and renaming of existing SINCs.

C.130 The London Borough of Richmond upon Thames (LBR) is taking several key actions to enhance the Borough's biodiversity. LBR will collaborate with schools to promote the rewilding of playing fields, supporting initiatives like the Thames Landscape Strategy's Rewilding Arcadia project. It will also stop installing artificial grass at LBR facilities (except for sports areas) to preserve natural habitats. LBR plans to identify additional tree planting opportunities across the borough and launch a Tree Warden Scheme, encouraging the community to care for local trees. These efforts will help improve biodiversity by creating more natural spaces, supporting local ecosystems, and increasing green cover throughout Richmond **[See reference 157]**.

Old Oak and Park Royal Development Corporation (OPDC)

C.131 SINCs within the OPDC area are designated under the OPDC Local Plan **[See reference 158]**. In total across the OPDC, there are 19 SINCs. This includes the Grand Union Canal, which is recognised as a SINC of Metropolitan Importance. Additionally, part of Wormwood Scrubs is designated as a LNR **[See reference 159]**.

C.132 OPDC has recently delivered biodiversity improvements along the Grand Union Canal. This includes towpath clean ups, planting events, and maintenance events **[See reference 160]**.

Implications for health

C.133 A strong link exists between access to nature and biodiversity and associated health and societal benefits. Considering the COVID-19 pandemic, the importance of safe, accessible and well-connected green and blue spaces for improving quality of life has also never been more pertinent.

C.134 According to the recently published World Health Organisation report 'Nature, Biodiversity and Health: An Overview of Interconnections' **[See reference 161]** increased exposure to nature has been associated with a lower risk of specific health conditions including depression, anxiety, cortisol, blood pressure, pre-term birth, low birthweight, type 2 diabetes, and reduced risk of death from all causes. There is generally positive evidence relating to the impacts of activities in natural environments on children's mental health and their cognitive, emotional and behavioural functioning. These health benefits are thought to arise through a range of pathways, including providing opportunities and safe spaces for physical activity, for restoration and relaxation, and for socialising with friends and family. Exposure to green and blue space is also associated with higher levels of life satisfaction. Impacts appear to differ according to socio-economic status and other demographic factors such as age or gender.

Air, land and water quality

Soils and geology

C.135 Soil is a finite natural resource which regenerates only over extremely long geological timescales and provides many essential services including food production, water management and support for valuable biodiversity and ecosystems. It also plays a role in preventing climate change as a larger storer of carbon.

C.136 Although all seven of the local authorities comprising the WLWP area are within the large urban expanse of Greater London, there are still large areas of green space, although these are mostly in non-agricultural use. Natural England land classification maps for London and the Southeast **[See reference 162]** show that although most land is classified as 'land predominantly in urban use' there are pockets of Good to Moderate within the WLWP area.

C.137 Most of the WLWP area is considered brownfield or previously developed land (PDL). All seven of the local authority areas have a history of industrial land use and potential for the discovery of contaminated land requiring mitigation in tandem with new development.

C.138 There are limited minerals deposits or mineral processing facilities within the WLWP area. National policy requires that mineral resources are safeguarded for future use **[See reference 163]**. The recycling of soils and construction wastes on development sites is one of the main ways that use of these resources is minimised in the WLWP area.

Water

C.139 Water consumption rates per household are still mainly composed of flushing toilets, washing clothes or taking a bath or shower. The London Plan 2021 **[See reference 164]** sets water efficiency standards for new development of 105 litres or less per person per day.

C.140 Figures from the Thames Water annual performance report (2021/22), indicated that daily water consumption in London was 144.4 litres per capita, down from 152.2 litres per capita in 2020/21, but still higher than their target of 142.6 litres per capita **[See reference 165]**. Data on water usage by the waste sector is not readily available.

C.141 Several water bodies across the seven local authority areas do not meet the required ‘good' status, and a number of water bodies and watercourses are protected sites and sensitive to changes in water quality. In relation to Richmond upon

Thames, water quality in the River Thames has not improved in recent years. Surveys indicate that while overall water quality has remained stable, 92% of samples contained significant levels of coliform bacteria. Additionally, in 1% of cases, dissolved oxygen levels dropped to critically low levels, posing a threat to aquatic life **[See reference 166]**. The Brent Rivers and Lake Operation Catchment, which comprises the River Brent and tributaries including Lower Brent, Wealdstone Brook, and Bently Priory, which flow through the West London Boroughs of Brent, Ealing, Harrow, Hounslow, Hillingdon, and the OPDC area, are considered to be in 'moderate' ecological health. The Catchment Data Explorer provides detailed information on the "Reasons for Not Achieving Good Status" (RNAGS) for water bodies within the WLWP area The main reasons for the catchment not achieving good ecological status are the effects of pollution from multiple sources and physical modifications that have been made to the river channel and floodplain shape and structure, neglect and lack of visibility. All of the rivers, lakes and canals in the Brent Catchment also fail on Chemical quality. The main contributing sectors are listed as the water industry, navigation, transport, domestic general public and some agriculture and rural land management. However, waste treatment and disposal is not listed as a contributing sector in the 'Challenges data' for the catchments covering the WLWP area **[See reference 167] [See reference 168]**.

C.142 Under predicted climate change scenarios, more frequent drought conditions are expected in London and the South East of England, along with increased demands on water resources. The combination of limited water resources and high demand has resulted in the Environment Agency designating the Thames Water region to be 'seriously' water stressed, meaning that more water is taken from the environment than the environment can sustain in the long term. Future developments will create additional demand for water abstraction from surface and groundwater sources in London. At a high level, it is broadly assumed that the quality of water bodies will improve in line with national objectives. However, water quality is influenced by a wide range of internal and external factors, including climate change, geology and soils, human consumption and population change, and pollution from human activities such as industry, agriculture, contaminated runoff from roads and other built surfaces, combined sewer overflows, and nutrient enrichment from treated wastewater.

Air and noise pollution

C.143 Human health, quality of life and the environment can all be negatively affected by air and noise pollution. The London Boroughs of Brent, Ealing, Harrow, Hounslow, and Richmond upon Thames have designated Air Quality Management Areas (AQMAs) covering their entire boroughs, while the Hillingdon AQMA covers approximately three-quarters of the borough. The OPDC area spans parts of Brent, Ealing, and Hammersmith & Fulham, all of which have borough-wide AQMAs.

C.144 Transport is the primary source of NO_2 and $PM_{2.5}$ pollution in the local authorities' areas, with Heathrow Airport notably contributing to emissions in Hillingdon and Hounslow **[See reference 169]**.

C.145 Air quality data for London shows that 2016 monitoring sites in London recorded over 4,000 hours above the safe threshold for NO_2. In 2023, this reduced to just 22 hours, a reduction of 99% in the number of hours when NO_2 concentrations exceeded the hourly legal limit. The introduction of the world's first 24-hour Ultra Low Emission Zone (ULEZ) in 2019, followed by its expansion across London in 2023, has helped transform the city into the largest clean air zone of its kind. As of 2024, over 95% of vehicles in London comply with ULEZ emissions standards, up from just 39% in 2017. Additionally, between 2019 and 2022, emissions of NOx, $PM_{2.5}$, and CO_2 has reduced. Specifically, ULEZ policies were estimated to have reduced nitrogen oxides (NOx) emissions from road traffic by 13,500 tonnes in London between 2019 and 2022 **[See reference 170] [See reference 171]**.The ULEZ covers all London boroughs, except for the area of the M25, and applies to all cars, motorcycles, vans and specialist vehicles (up to and including 3.5 tonnes) and minibuses (up to and including 5 tonnes).The Mayor of London also designated a Low Emission Zone (LEZ), which covers all roads within Greater London, those at Heathrow and parts of the M1 and M4 are included, except the M25 (even where it passes within the GLA boundary). The LEZ is designed to target pollution from the heaviest polluting heavy diesel vehicles.

C.146 The WLWP boroughs declared AQMA for the following pollutants:

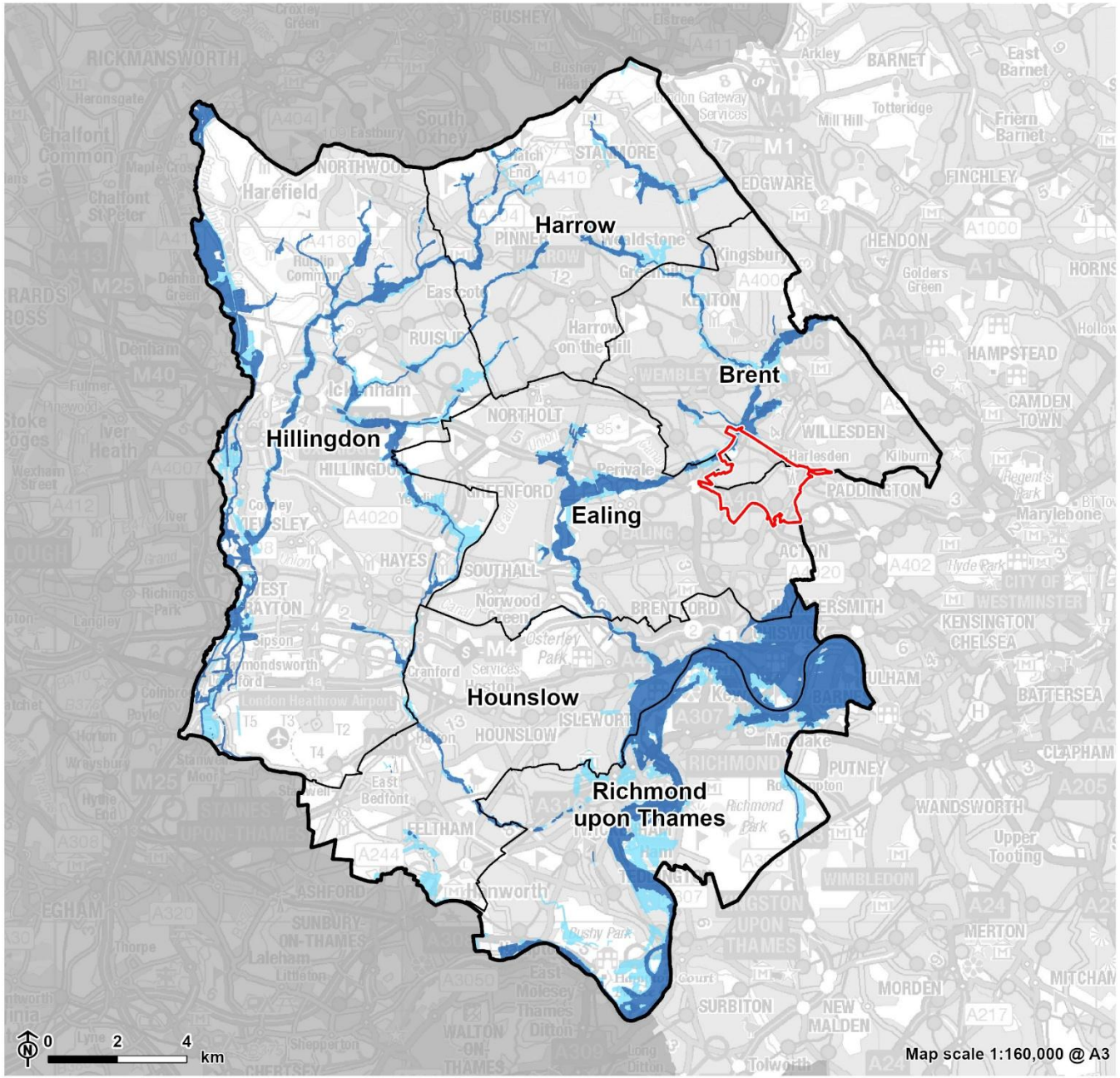
- Brent AQMA declared in 2006 for Nitrogen dioxide NO_2 and Particulate Matter PM_{10}
- Ealing AQMA declared in 2000 for Nitrogen dioxide NO_2 and Particulate Matter PM_{10}
- Harrow AQMA declared in 2002 for Nitrogen dioxide NO_2 and Particulate Matter PM_{10}
- Hounslow AQMA declared in 2006 for Nitrogen dioxide NO_2
- Hillingdon AQMA declared in 2003 for Nitrogen dioxide NO_2
- Richmond upon Thames AQMA declared in 2000 for Nitrogen dioxide NO_2 and Particulate Matter PM_{10}

C.147 There is a possibility that air quality may worsen in the long-term because of climate change, due to a greater likelihood of prolonged periods of still, dry days, and to-date this relationship has been difficult to predict. This will need to be considered in the potential development of air quality action plans and monitoring regimes, as will the effects of major infrastructure developments.

Implications for health

C.148 Air pollution is associated with several adverse health impacts and is recognised as a contributing factor in the onset of heart disease and cancer. Pollution particularly affects the most vulnerable in society such as children, the elderly, and those with existing heart and lung conditions. There is also often a strong correlation between poor air quality areas and less affluent areas.

C.149 London and the South East of England is one of the driest areas of the country and thus faces ongoing water resource challenges, growing demand, and uncertainty from climate change. In addition, poor water quality can increase the risk of water-borne disease.



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Figure C.1: Flood Risk

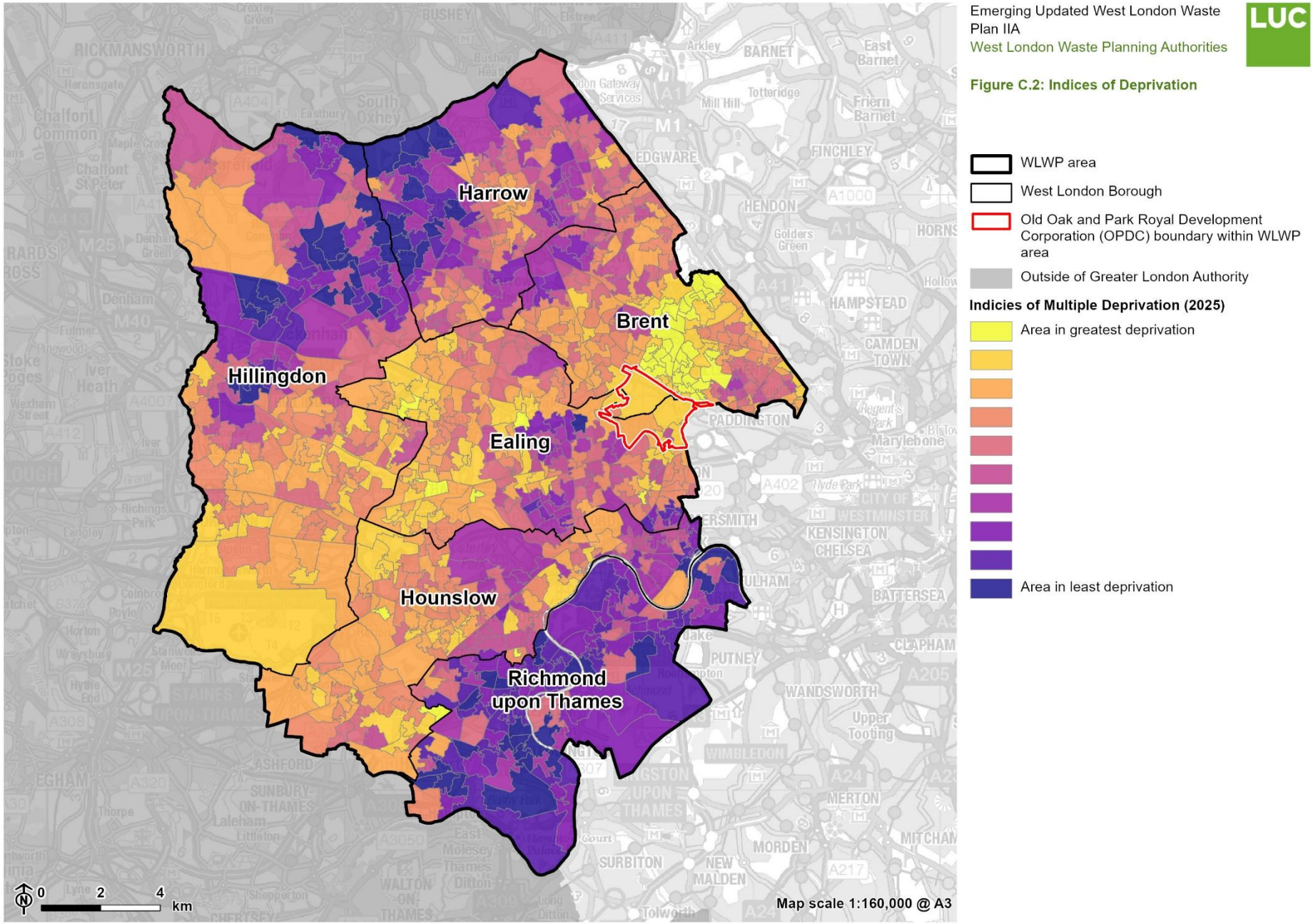
- WLWP area
- West London Borough
- Old Oak and Park Royal Development Corporation (OPDC) boundary within WLWP area
- Outside of Greater London Authority

Flood Map for Planning

- Flood Zone 2
- Flood Zone 3

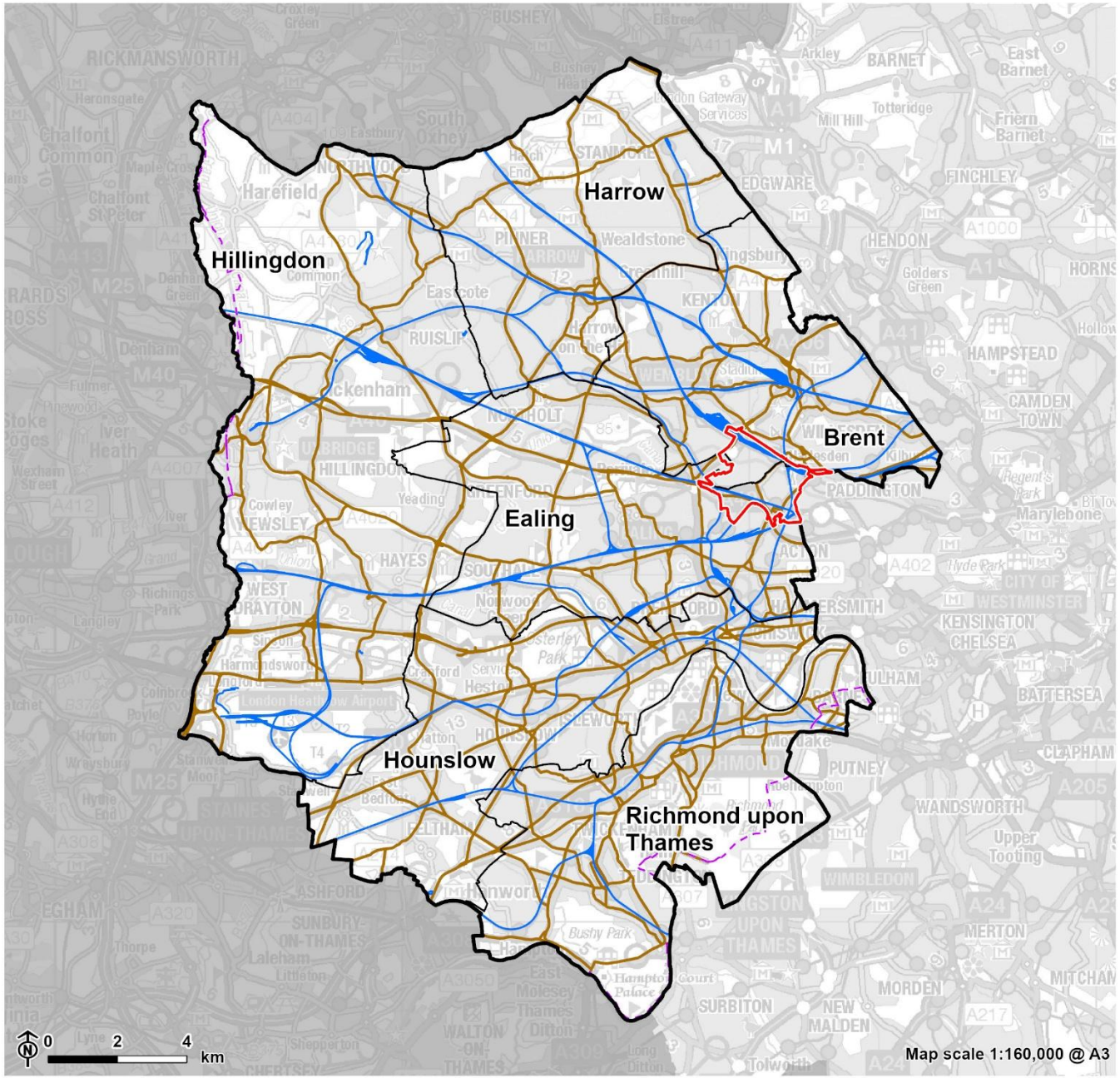
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Figure C.3: Transport Network

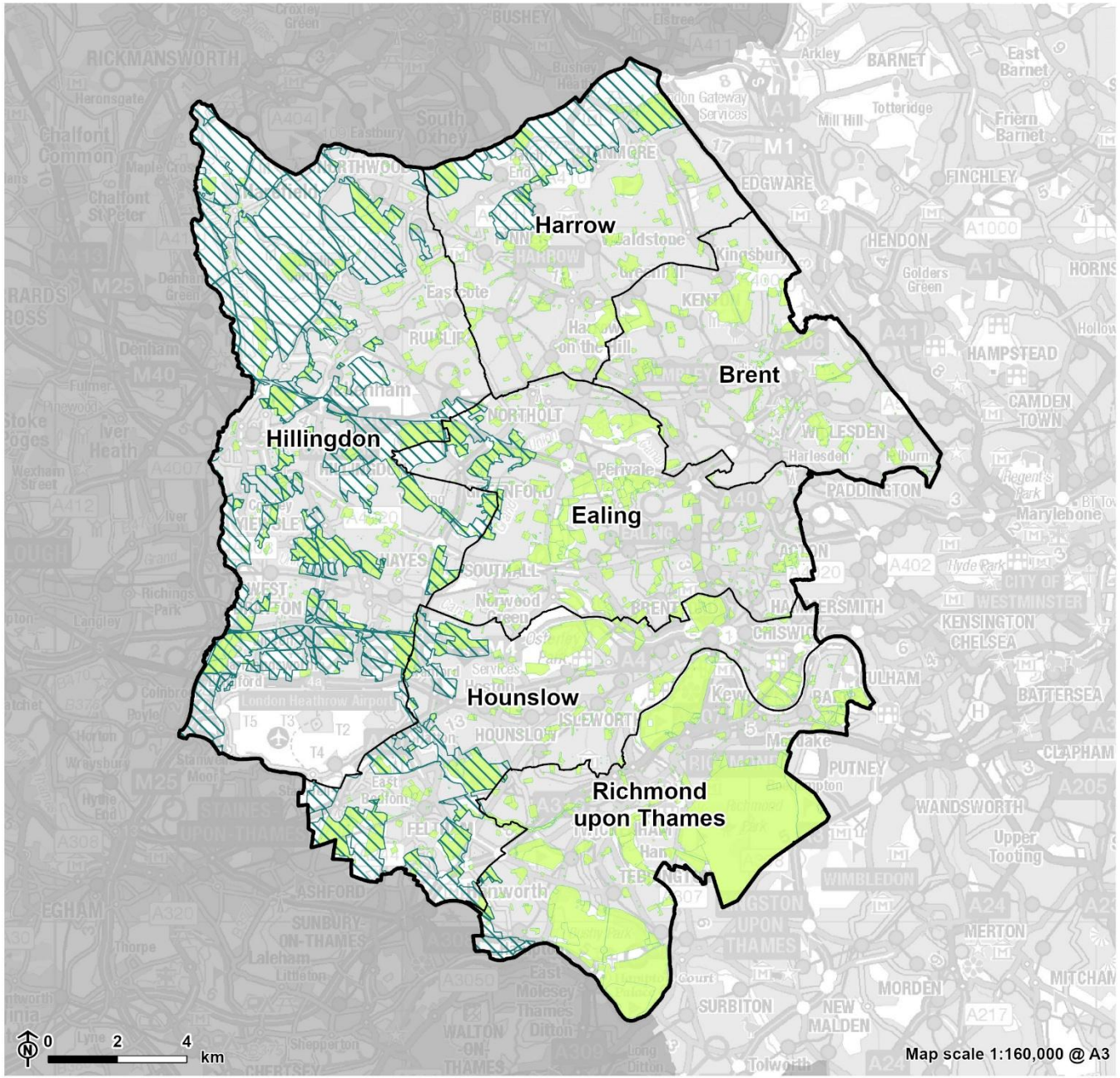
- WLWP area
- West London Borough
- Old Oak and Park Royal Development Corporation (OPDC) boundary within WLWP area
- Outside of Greater London Authority

Transport Infrastructure

- National Cycle Network
- Major road
- Railway

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Figure C.4: Open Space

WLWP area

West London Borough

Outside of Greater London Authority

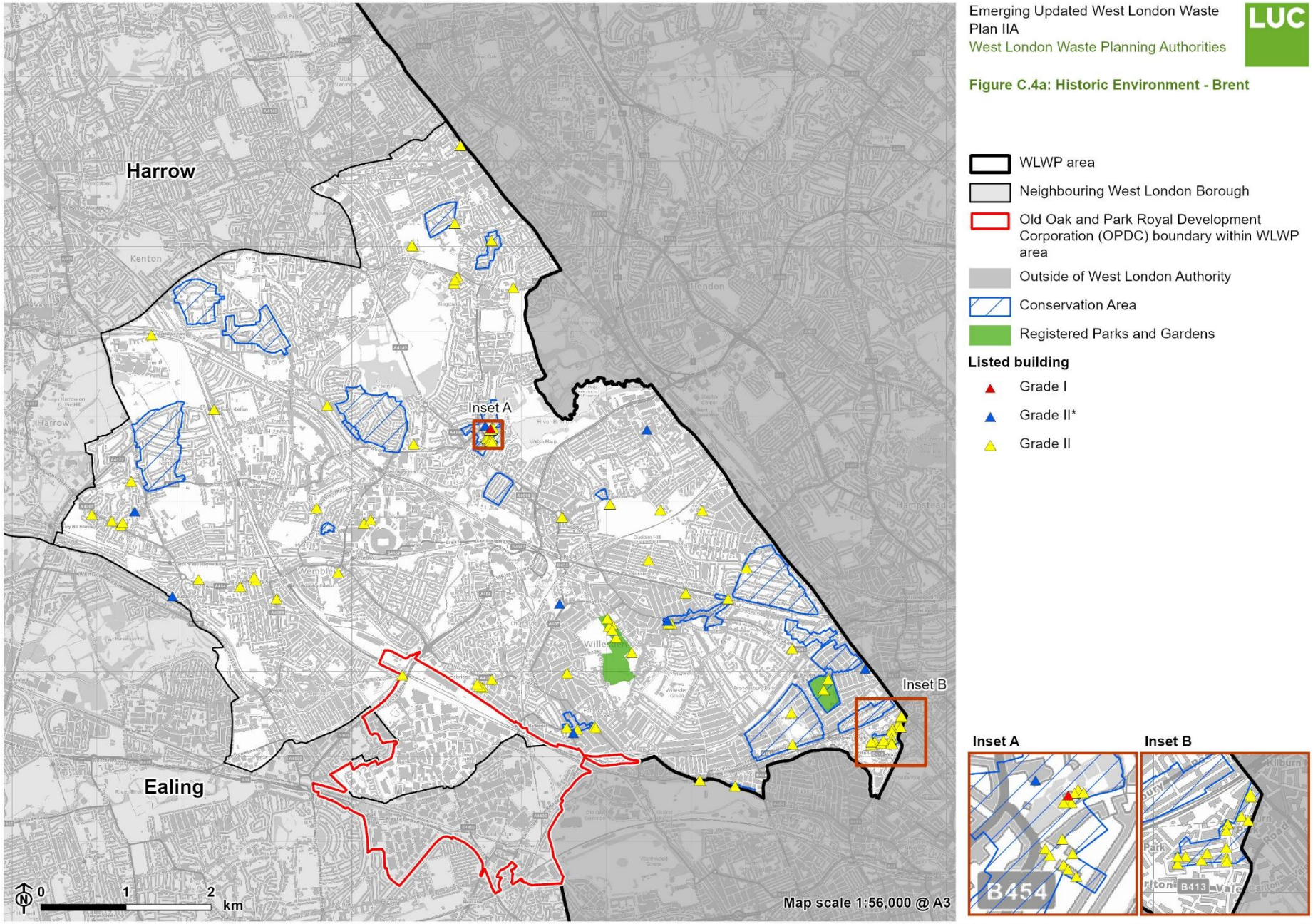
Open Space

Green Belt

Greenspace

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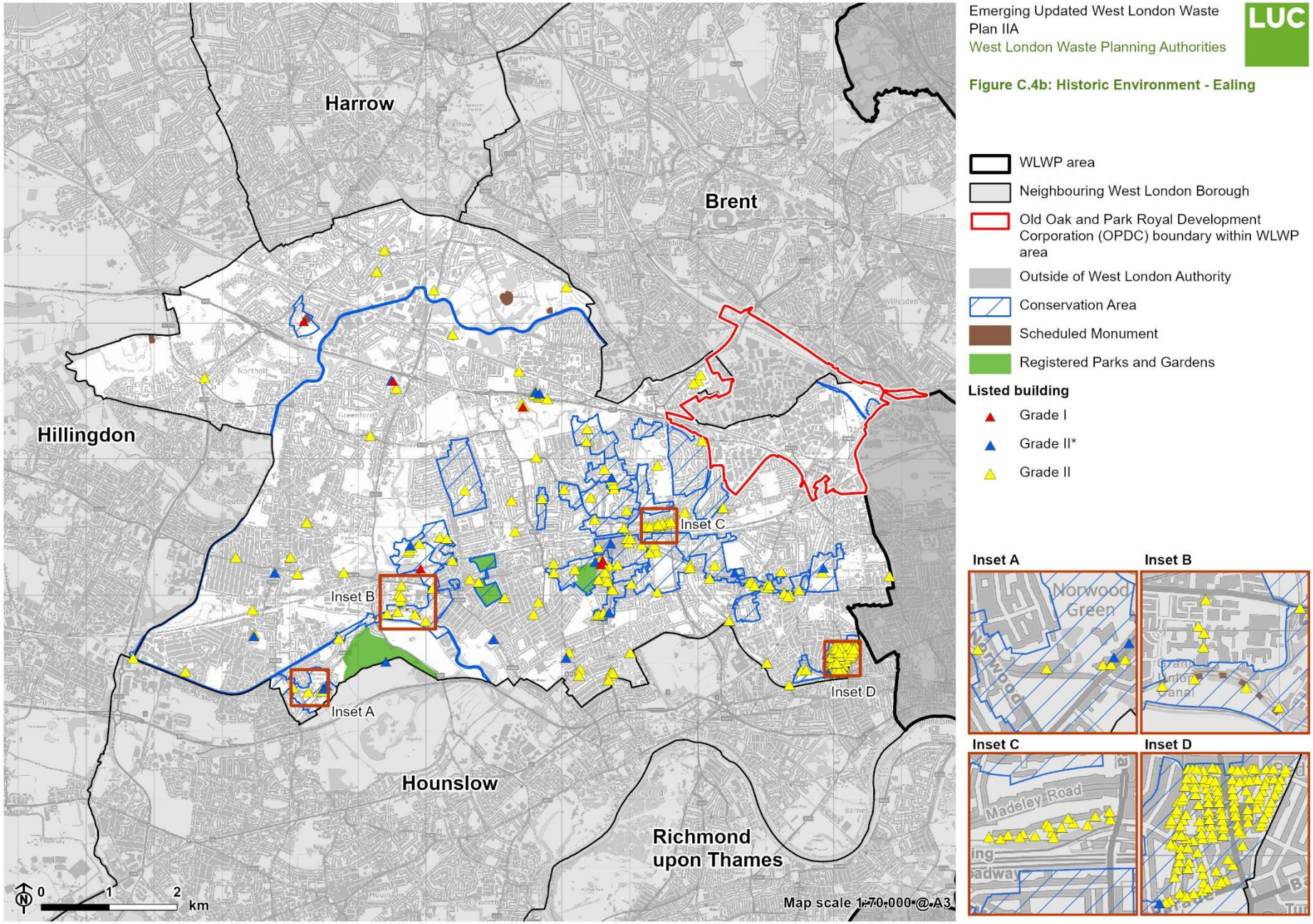
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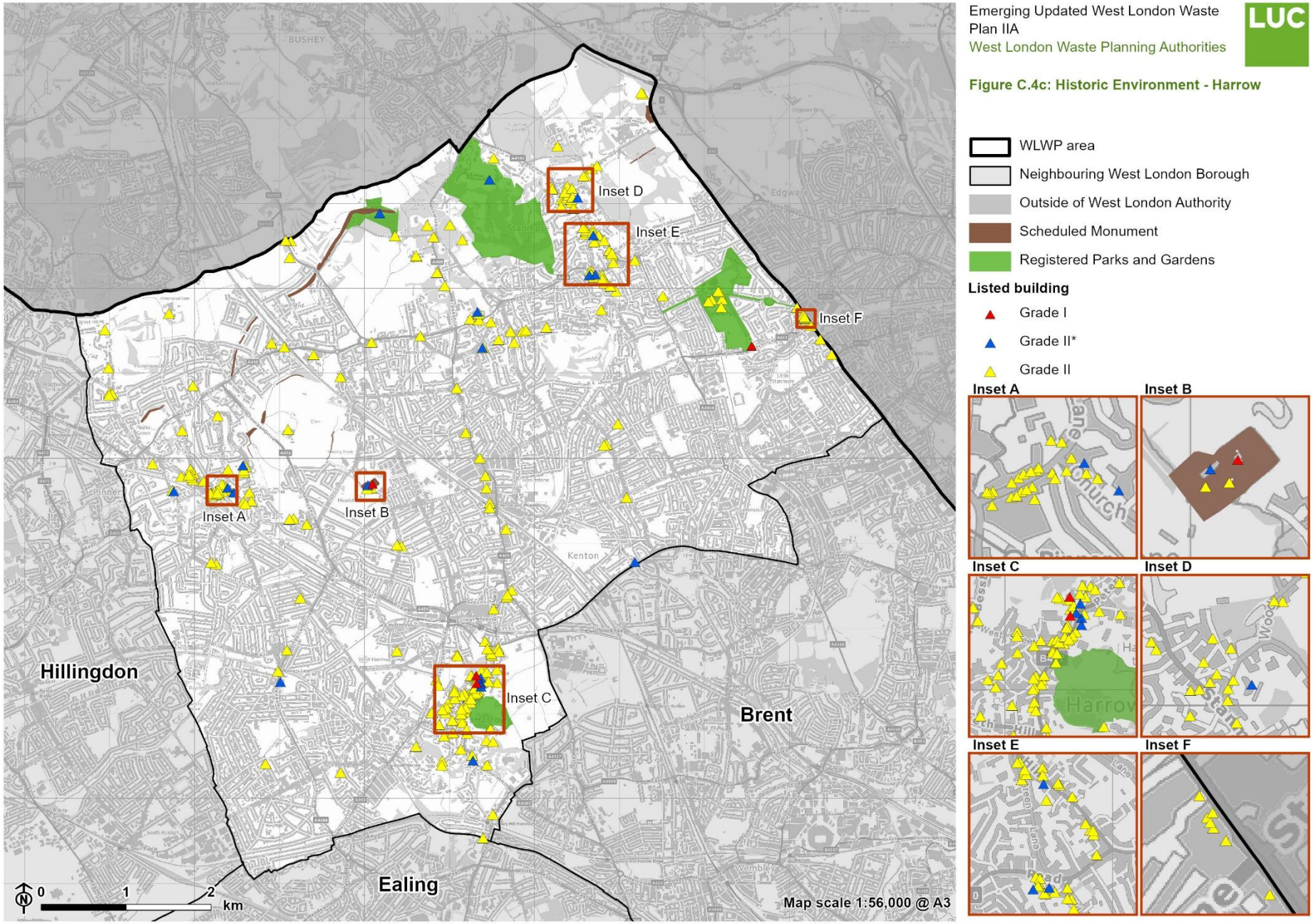
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Figure C.4b: Historic Environment - Ealing



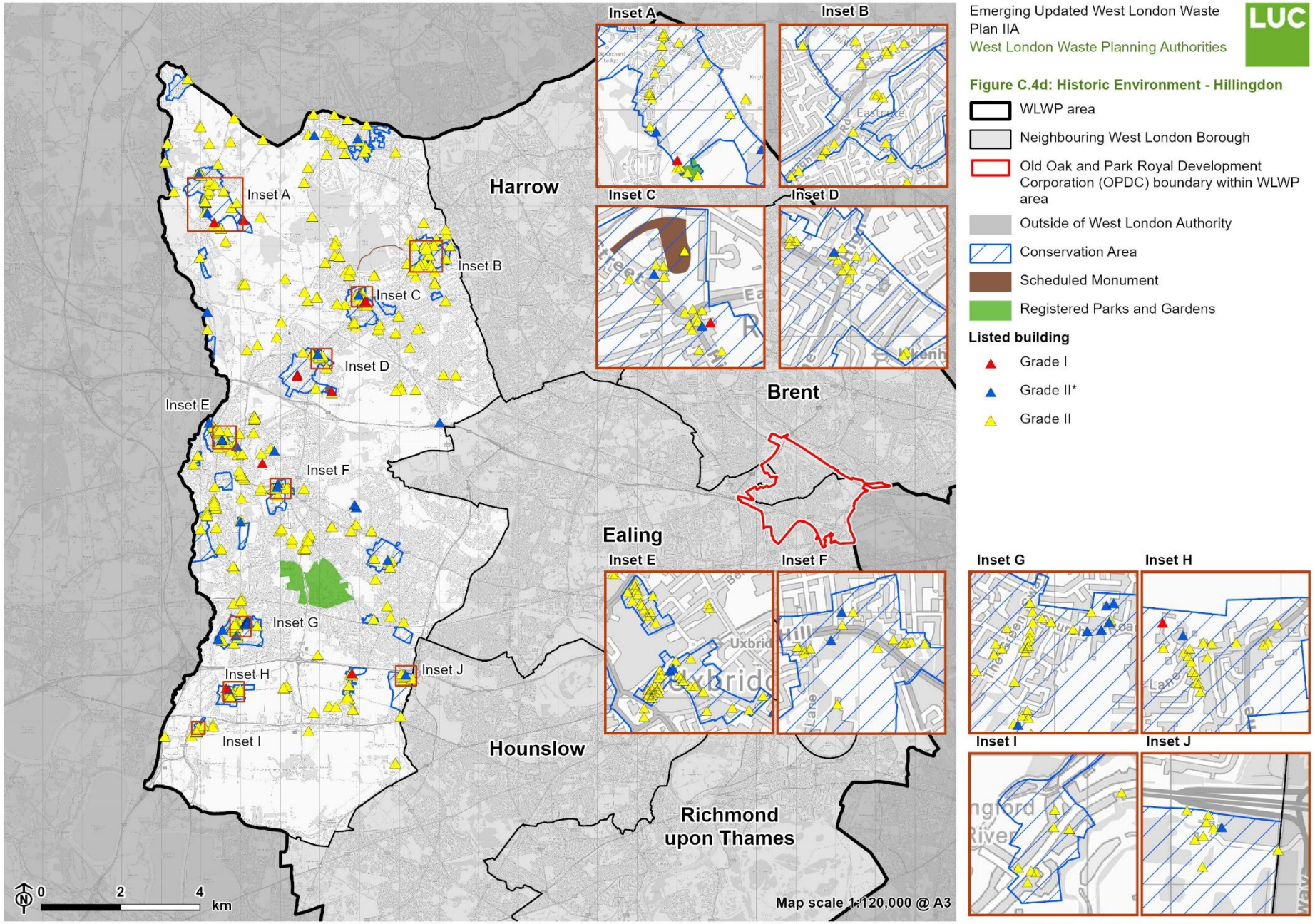
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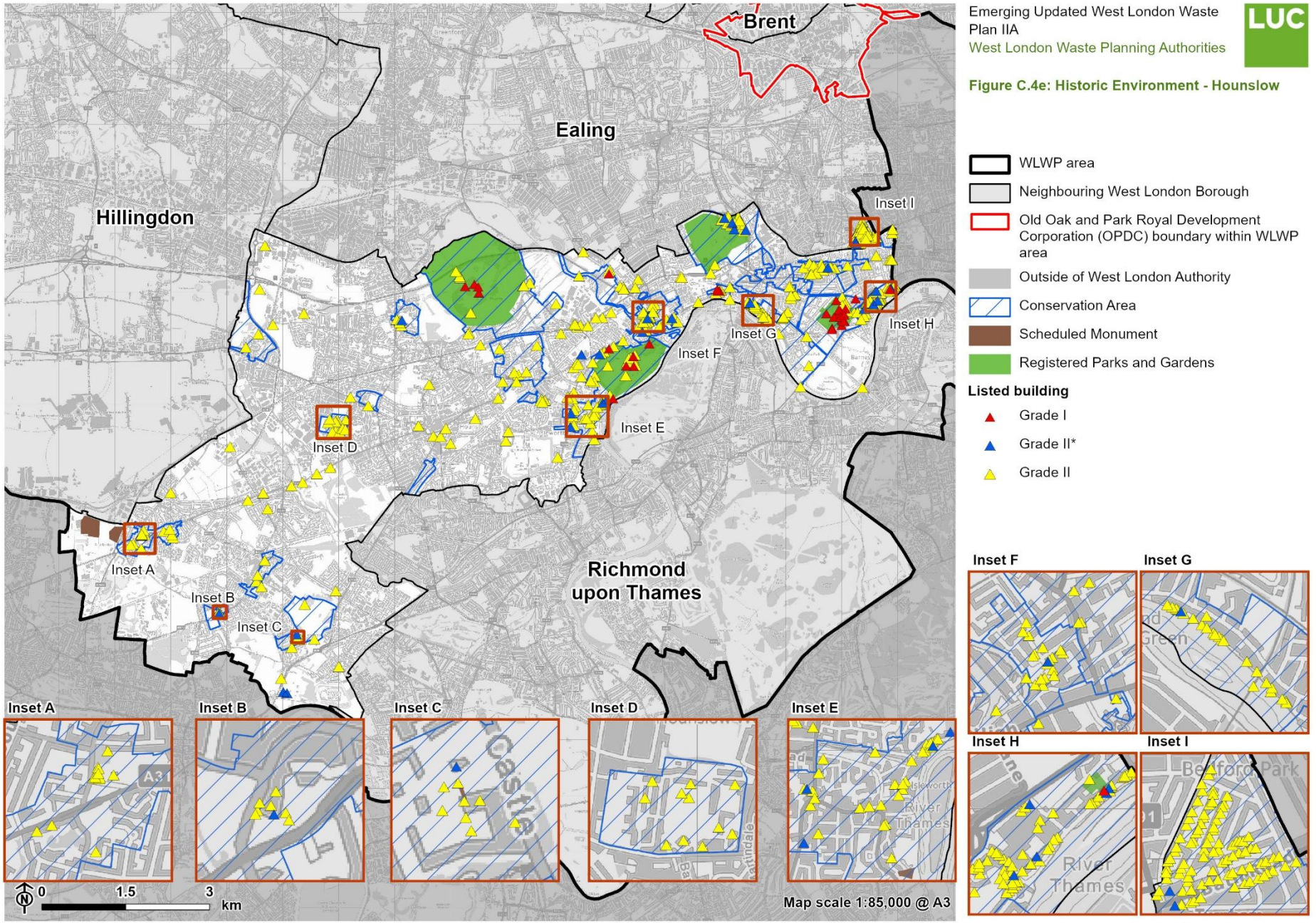
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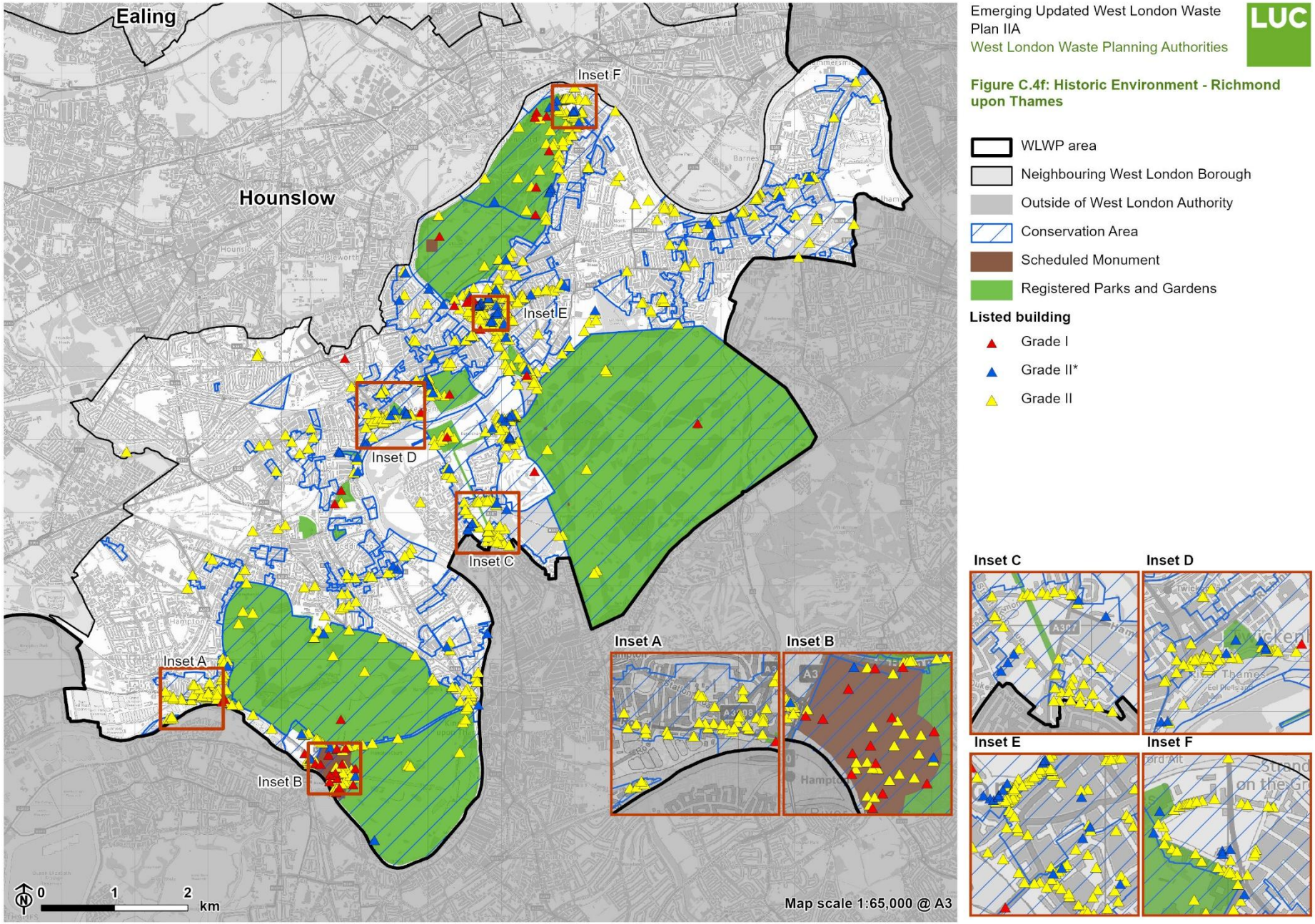
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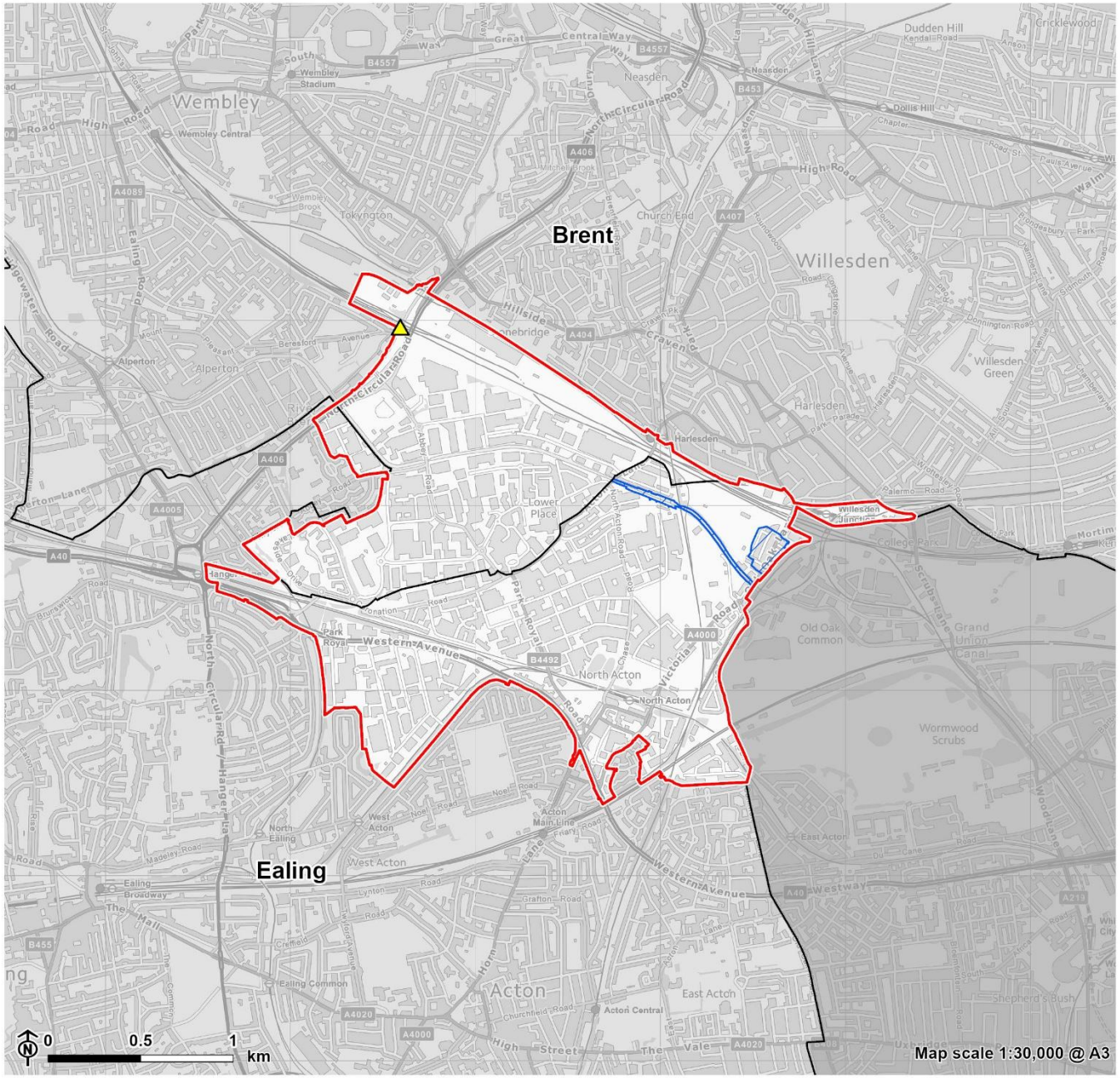
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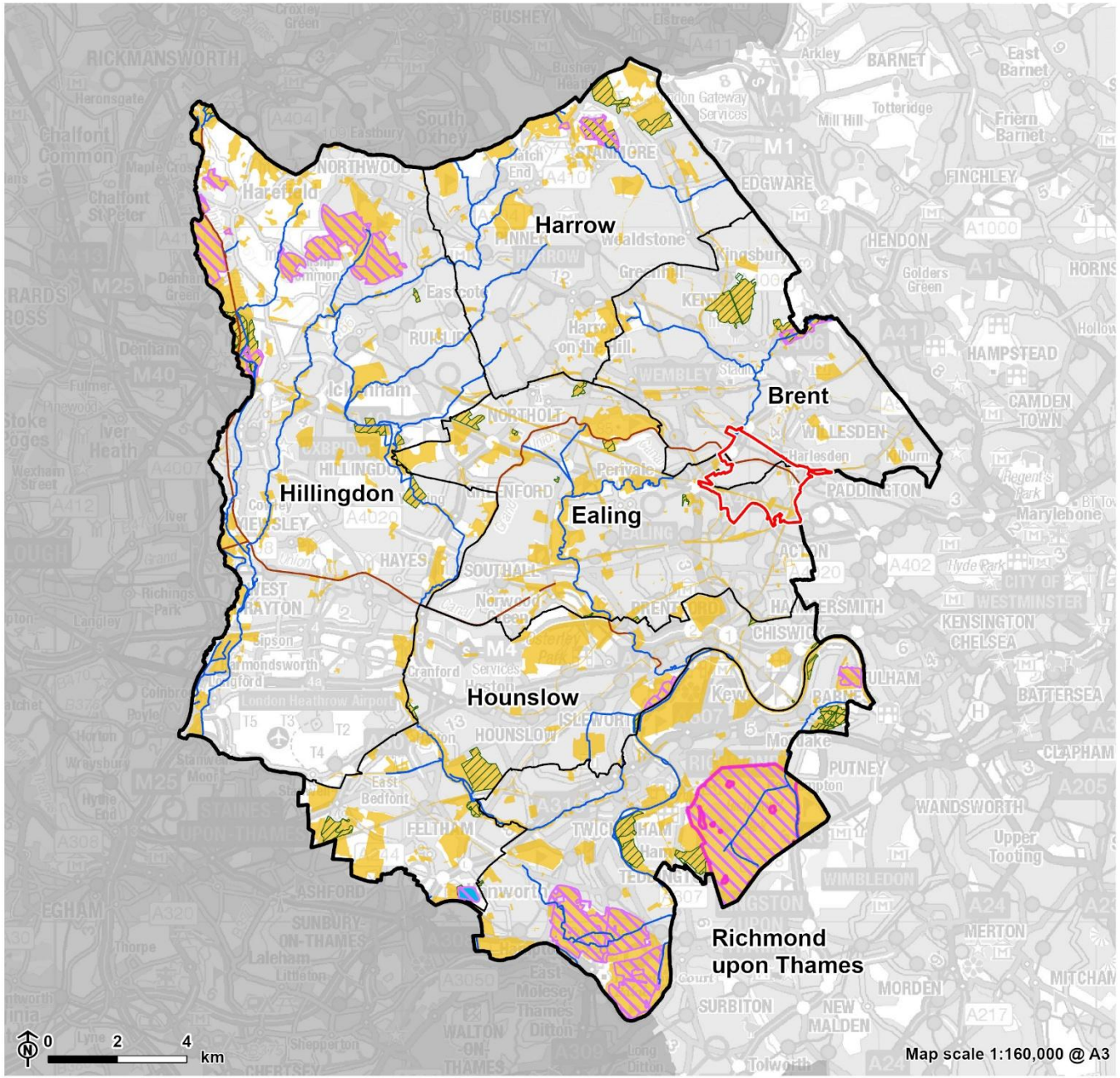
Figure C.4g: Historic Environment - Old Oak and Park Royal Development Corporation (OPDC)

- Old Oak and Park Royal Development Corporation (OPDC) boundary within WLWP area
- West London Borough
- Outside of West London Authority
- Conservation Area

Listed building

- Grade II

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Figure C.5: Biodiversity

- WLWP area
- West London Borough
- Old Oak and Park Royal Development Corporation (OPDC) boundary within WLWP area
- Outside of Greater London Authority

Statutory Ecological Designations

- Special Area of Conservation (SAC)
- Special Protection Area (SPA)
- Site of Special Scientific Interest (SSSI)
- Local Nature Reserve (LNR)

Non-statutory Ecological Designation

- Site of Importance for Nature Conservation (SINC)

Other Notable Habitats

- Canal
- River

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Appendix D

Site Assessment Criteria

IIA objective 1: Minimise the WLWP's contribution to climate change and promote climate resilient infrastructure

D.1 All facilities that may be proposed on potential site options are likely to involve some road transportation of waste with associated CO2 emissions that contribute to climate change, however, proximity to rail depots (or canals) could provide opportunities to explore more sustainable modes of transporting waste. Section 5 of the National Planning Policy for Waste (NPPW) sets out criteria for site assessments, which include the need to assess sites and areas against the capacity of existing and potential transport infrastructure to support sustainable movement of waste and products arising from resource recovery, seeking to use modes other than road transport where practicable and beneficial **[See reference** 172**]** . Proximity to sustainable transport modes and the strategic road network is covered under IIA objective 5 below.

D.2 If energy were to be recovered from the waste management process under a combined heat and power (CHP) scheme, this could have a significant positive effect on increasing the proportion of energy generated from renewable sources in West London and reducing contributions to climate change. However, in general, the opportunity to incorporate a CHP scheme is only available to future residential or business park developments as opposed to retrofitting infrastructure into existing development. Proximity to future residential/business developments is difficult to determine. In addition, the type of facility that might be developed on a site option is not likely to be confirmed until the planning application stage thus the significant positive effects would be uncertain.

D.3 The following appraisal question was not assessed in this site appraisal criteria as reducing emissions is covered under IIA objective 5 below:

- Will it reduce the WLWP's contribution to climate change by reducing greenhouse gas emissions from waste management activities?

Table D.1: IIA objective 1 assumptions and justifications for IIA effects

Appraisal Question	Effect	Justification / reasons for effect	Data sources
Will it [the WLWP] promote energy efficiency by encouraging the use of energy efficient buildings and plant, and the use of appropriate renewable or low carbon energy sources on waste sites?	++?	The development of energy from waste facilities on any of the potential site options would have a significant positive effect on increasing the proportion of energy generated from renewable sources in West London.	No data needed.
	+	N/A	
	0	The proposed waste site would not involve the recovery of energy/heat from waste.	
	-	N/A	
	--	N/A	

IIA objective 2: Move treatment of waste up the Waste Hierarchy

D.4 The WLWP aims to ensure that landfill is a 'minimised' when developing waste management facilities as supported by Policy WLWP 5 – Deposit of Waste on Land. All facility types that may be developed on potential site options are therefore likely to have a minor positive effect by ensuring waste management occurs using processes higher up the waste hierarchy than landfill. However, the specific location of sites for these waste management

facilities would have no effects on this objective as the effects depend on the type of facility that eventually gets proposed.

D.5 A number of new waste management facilities focus on sustainable waste management at the higher end of the waste hierarchy. New recycling and composting facilities can generate feedstock for reprocessing facilities or composting outlets in close proximity, and facilities utilising energy recovery technologies would provide energy which could be used by existing development, providing sustainability benefits associated with the proximity principle and reduces transportation distances.

Table D.2: IIA objective 2 assumptions and justifications for IIA effects

Appraisal Question	Effect	Justification / reasons for effect	Data sources
Will it promote the re-use, recycling and recovery of waste in accordance with the waste hierarchy? Will it contribute to minimising disposal of all forms of waste, across the WLWP area and across the wider London area? Will it contribute to the aim in the London Plan of a zero waste city by 2050?	++	N/A	No data needed.
	+?	All facility types except landfill could have a minor positive effect by ensuring waste management occurs using processes higher up the waste hierarchy than landfill. However, uncertainty is expressed (+?) as it will depend on the actual type of facility that gets proposed at the planning application stage.	
	0	N/A	
	-	N/A	
	--	N/A	
Will it promote a circular low carbon economy within the WLWP area, and within London?	++	N/A	No data needed.
	+?	The creation of additional recycling and composting facilities may have a minor positive impact on encouraging investment and growth of 'green industry' in the area. This effect is also uncertain however, as it will depend on the type of facility proposed on the site,	

Appraisal Question	Effect	Justification / reasons for effect	Data sources
		and the feasibility of incorporating energy use within nearby development, which will not be able to be determined until planning application stage.	
	0	N/A	
	-	N/A	
	--	N/A	
Will it support community engagement and education to empower local communities to take action to reduce waste?	++	N/A	No data needed.
	+	All of the sites could have an indirect positive effect on education opportunities and engagement when developed during construction and operation, as they are likely to result in a small amount of job creation for local people and may include education centres within the site.	
	0	N/A	
	-	N/A	
	--	N/A	

IIA objective 3: Support, maintain and enhance the development of an inclusive economy

D.6 Job creation from the development of waste management facilities is not expected to be significant within the West London economy. Some newer waste facilities build small education centres on-site to improve understanding of sustainable waste management practices for the public and schools, thus waste development on sites could have a positive effect on education opportunities in West London. However, this would not be known until the planning application stage when more details of developments may be proposed on the sites. Waste facilities may harm the local West London economy by affecting sensitive receptors.

D.7 The following appraisal question was not assessed in this site appraisal criteria as proximity to sensitive receptors is covered in IIA objective 4 below:

- Will it minimise harm to the existing local economy, locating waste uses away from existing sensitive receptors?

Table D.3: IIA objective 3 assumptions and justifications for IIA effects

Appraisal Question	Effect	Justification / reasons for effect	Data sources
Will it generate employment opportunities in the waste and resource sector for local people, especially within areas of deprivation, providing opportunities to improve local skills?	++	The development of recycling (HWRCs, MRFs, inert waste recycling, MBT) and composting facilities on any of the potential site options could have a significant positive effect on providing a source of raw materials and some level of employment. Where the site promoters include several potential uses or no proposed use, an uncertain significant positive effect (++?) is given as it depends on the facility which is actually proposed.	Employment domain of the Index of Multiple Deprivation 2019 from GOV.UK.
	+	All of the site options could have an indirect positive effect on increasing employment levels when developed during construction and operation.	
	0	N/A	
	-	N/A	
	--	N/A	

IIA objective 4: Protect and improve people's health

D.8 All of the potential site options are likely to have a minor negative effect on protecting the health and amenity of local residents and communities, due to the potential biospores or gaseous emissions that may be released from certain waste management technologies such as composting, anaerobic digestion or producing energy from waste. Although Policy WLWP 2: Provision of Additional Waste Management Capacity protects local amenity, recreational and amenity spaces are also likely to be negatively affected by waste management sites. However, this depends on the mitigation measures applied onsite and the design of the facilities, which are to be assessed at the planning stage of the application.

D.9 The following appraisal questions were not assessed in the site appraisal as the location of new waste management facilities will not have an effect on the appraisal question and/or it depends on the proposal (facility type, design, etc.), which would be assessed at the planning application stage:

- Will it reduce the incidence of crime associated with waste (e.g. fly-tipping and illegal dumping of large amounts of waste) by ensuring a sustainable network of waste facilities across the WLWP area, and London?
- Will it incorporate Nature Based Solutions to deliver multiple benefits to people and nature at the same time?

Table D.2: IIA objective 4 assumptions and justifications for IIA effects

Appraisal Question	Effect	Justification / reasons for effect	Data sources
Will it avoid or minimise adverse effects on human health and safety, including	++	N/A	Deprivation data from Index of Multiple Deprivation 2019 from GOV.UK
	+	N/A	
	0	Potential site options which:	

Appraisal Question	Effect	Justification / reasons for effect	Data sources
disproportionate impacts on communities, including those with protected characteristics, mental health vulnerabilities, and those in more deprived areas?		Are over 250m from sensitive receptors (i.e. residents, schools, hospitals, offices) are expected to have no or negligible effects on the human health. Potential site options which: Are not located within one of the more deprived areas nationally (i.e. have an IMD of above 40%) are not expected to have a disproportionate effect on the health of more deprived/vulnerable communities.	Examination of OS base maps for residential areas, schools and hospitals
	-	Potential site options which: Are located within one of the 20-40% most deprived areas nationally could have a minor negative disproportionate effect on the health of more deprived/vulnerable communities.	
	--?	Potential site options which: Are located within one of the 20% most deprived areas nationally could have a significant negative disproportionate effect on the health of more deprived/vulnerable communities. Proposals for all types of facility within 250m of sensitive receptors (i.e. residents, schools, hospitals, offices) have the potential to have a significant negative impact on human health due to the potential release of biospores	

Appraisal Question	Effect	Justification / reasons for effect	Data sources
		and air emissions from certain facilities such as composting, anaerobic digestion or producing energy from waste. These impacts are uncertain as they depend on the type of facility, its design and potential mitigation measures proposed, which would be assessed at the planning application stage.	
Will it provide opportunities to improve health and amenity through delivery of green infrastructure, enhanced public rights of way and improved access to recreation as part of the restoration of sites, or provision of biodiversity net-gain in any redeveloped sites? Will it promote public access and engagement with green and blue spaces? Will it avoid or minimise adverse effects on the quality and extent of existing recreational assets?	++	N/A	Green Belt, MOL, open space and PRoW from Planning Data Map
	+	N/A	
	0	Potential site options which: Are more than 500m from a recreational facility or open space More than 250m from a leisure or recreational facility or open space, including Rights of Way Are not expected to have an effect on recreation activities.	
	-	Potential site options which: Adjoin or are within 500m of a recreational facility or open space Within 250m of a leisure or recreational facility or open space, including Rights of Way Could have a negative effect on the protection and enhancement of recreational facilities and access to green and blue spaces by making the sites less attractive for users.	
	--	Potential site options which: Include a recreational facility or open space Include a leisure or recreational facility or open space, including Rights of Way	

Appraisal Question	Effect	Justification / reasons for effect	Data sources
		could have a significant negative effect on the protection and enhancement of recreational facilities, as development of the sites would either mean removing part of a facility/open space, or removing land which has potential for recreation/access to green and blue spaces.	

IIA objective 5: Manage waste close to the source and promote sustainable modes of transport

D.10 All facilities that may be proposed on sites in the WLWP are likely to involve some road transportation of waste, however, proximity to rail depots (or canals) could provide opportunities to explore more sustainable modes of transporting waste. Section 5 of the NPPW sets out criteria for site assessments, which include the need to assess sites and areas against the capacity of existing and potential transport infrastructure to support sustainable movement of waste and products arising from resource recovery, seeking to use modes other than road transport where practicable and beneficial. Additionally, the NPPF supporting document: Planning Practice Guidance on Waste (2015) supports this by suggesting the siting of waste management facilities will be driven by the "s*uitability of local transport infrastructure and availability of sustainable transport modes*." Where road transport is to be used Appendix B of the NPPW requires consideration of the suitability of the road network in testing the suitability of potential waste management sites, and the extent to which access would require reliance on local roads **[See reference** 173**]**. It is considered that sites within 500m of the strategic road network are generally likely to have better access and less impact on local roads travelling through residential areas.

D.11 All of the potential types of facility could potentially have a negative effect on traffic congestion, particularly where areas of poor air quality might be affected, which is one of the appraisal questions for IIA objective 5. This is because all development would result in some level of traffic during construction and potentially during operation as well, and most of the West London Waste Plan area is within an Air Quality Management Area. However, the effects on air pollution are recorded under IIA objective 11 below.

D.12 The location of new waste management facilities will not have an effect on supporting the transition from low to ultra-low and then zero emission vehicles for the transportation of waste by road, as this will depend on facility operator choices.

D.13 The following appraisal question was not assessed in this site appraisal criteria as air quality is covered in IIA objective 11 below:

- Will it contribute towards a reduction in traffic congestion, particularly where areas of poor air quality might be affected?

Table D.3: IIA objective 5 assumptions and justifications for IIA effects

Appraisal Question	Effect	Justification / reasons for effect	Data sources
Will it reduce reliance on road-based freight movements and support the use of rail and water where this represents a deliverable, efficient and sustainable choice? Will it manage waste as close to source as possible? Will it support an overall reduction in the distance travelled by waste, either within the WLWP area or across the wider London area?	++	Potential site options which include an existing rail depot or wharf are considered to have a significant positive effect on this objective.	OS basemap data checked for Wharfs and Railways.
	+	Potential site options which are adjacent to an existing rail depot or wharf are considered to have a positive effect on this objective.	
	0	N/A	
	-	Potential site options which are within 250-500m from a potential rail depot or wharf and/or the strategic road network are considered to have a negative	

Appraisal Question	Effect	Justification / reasons for effect	Data sources
		effect on reducing reliance on road freight and increasing the efficient use of rail.	
	--	Potential site options which are >500m from a potential rail depot or wharf and/or the strategic road network are considered to have a significant negative effect on reducing reliance on road freight and increasing the efficient use of rail.	

IIA objective 6: Protect and enhance the historic environment

D.14 Listed buildings have statutory protection through the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended in November 2025). The Ancient Monuments and Archaeological Areas Act (1979) protects monuments whose preservation is given priority over other land uses. Local authorities are required to make provision for the protection of the historic environment and provide great weight to an assets conservation when considering proposals in their policies and their allocation of resources and registered parks and gardens, listed buildings and scheduled moments are a material consideration in planning terms, as defined in the NPPF Policy 16: Conserving and enhancing the historic environment paragraph 212 and 213.

D.15 The significance of a designated or non-designated heritage asset can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. However, development could also enhance the significance of the asset, provided that the development preserves those elements of the setting that make a positive contribution to or better reveal the significance of the asset. The proximity tests outlined below are intended to provide a basis for screening for the potential for adverse effects on heritage assets. In all cases, effects from a potential waste site will be subject to a degree of uncertainty as the actual effects on heritage assets will depend on the

particular scale, design and layout of the new waste management facility and opportunities which may exist to enhance the setting of heritage features, for example where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect.

Table D.4: IIA objective 6 assumptions and justifications for IIA effects

Appraisal Question	Effect	Justification / reasons for effect	Data sources
Will it conserve, protect and enhance designated and undesignated heritage assets and their settings?	++	N/A	GIS data from Historic England Conservation Areas designated within Local Plans.
	+	N/A	
	0	Potential sites which are: Within or adjacent to industrial estates More than 250m from a Historic Park or Garden More than 100m from a Scheduled Ancient Monument or Listed Building More than 100m from a Conservation Area are considered to have no effect on these assets	
	-	Potential sites which are: Within 250m of a Historic Park or Garden Within 100m of a Scheduled Ancient Monument or Listed Building Within 100m of a Conservation Area could have a negative effect on these assets.	
	--	Potential sites which: Are within a Historic Park or Garden Have Listed Buildings or Scheduled Ancient Monuments present on site Are located within a Conservation Area could have a significant negative effect on these assets.	

IIA objective 7: Protect, enhance, restore, and expand biodiversity and geodiversity assets

D.16 International and national sites have statutory protection through international and EU conventions (Ramsar, 1971; Bern, 1979; Bonn, 1979), UK law through the Conservation of Habitats and Species Regulations 2017 (as amended) and directive 2009/147/EC. These sites should receive the highest possible planning protection as outlined in paragraph 193 and 194 NPPF Policy 15: Conserving and enhancing the natural environment. Locally important sites of nature conservation should also be protected under NPPF Policy 15 as stated in paragraph 192, and it will be necessary to consider those sites that are not afforded statutory protection but are of local importance; especially those that provide ecological connectivity. In addition, previously developed land will not be assumed to have no biodiversity value. Previously developed land that has been undisturbed for a significant period of time can in some instances have greater ecological value than 'greenfield sites'.

D.17 Potential waste site options that contain or are close to internationally or nationally designated sites or locally important sites, have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, or increased recreation pressure. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity of potential site options to nature conservation sites provides an indication of the potential for an adverse effect, appropriate mitigation may avoid adverse effects and may even result in beneficial effects. Therefore, some uncertainty is expected. Additionally, the extent to which a waste management facility will affect water quality on a site depends on the type of facility used and will be assessed in more detail at the planning stage.

D.18 The following appraisal questions were not assessed in the site appraisal as effects will depend on the proposal (facility type, design, etc.), which would be assessed at the planning application stage:

- Will it contribute towards biodiversity net gain?

- Will it maintain and enhance wildlife corridors and minimise fragmentation of ecological areas and green and blue spaces, enhancing biodiversity and securing the level of net-gain set out in local, regional and national policy?
- Taking into account the impact of climate change, will it conserve and enhance designated and undesignated ecological assets and networks?
- Will it incorporate Nature Based Solutions to deliver multiple benefits to people and nature at the same time?
- Will it protect and support enhanced knowledge and understanding of geological sites of national, regional or local importance?

Table D.5: IIA objective 7 assumptions and justifications for IIA effects

Appraisal Question	Effect	Justification / reasons for effect	Data sources
Will it avoid effects on habitats of international, national, regional or local importance? Will it protect and enhance habitats of international, national, regional or local importance? Will it protect and improve local populations of terrestrial species that are of international, national, regional or locally importance? Will it avoid harm, protect, and improve local populations of aquatic and wetland species that are of international, national,	++	N/A	GIS data from Natural England and Waste Planning Authorities
	+	N/A	
	0	Potential sites which are: More than 500m from international (SAC, RAMSAR, SPA), national (NNR, SSSI), or local nature conservation designation, or BAP Priority Species and Habitats are not expected to affect this objective.	
	-?	Potential sites which are: Within 500m of an international (SAC, RAMSAR, SPA), national (NNR, SSSI), or local nature conservation designation, or BAP Priority Species and Habitats could have a negative effect on this objective.	
	--?	Potential sites which are: Within the boundary of an international (SAC, RAMSAR, SPA), national (NNR, SSSI), or local nature conservation designation, or BAP Priority Species and Habitats could have significant negative effects on this objective.	

Appraisal Question	Effect	Justification / reasons for effect	Data sources
regional or local importance?			
Will it avoid negative impact on water quality and therefore biodiversity particularly within aquatic/wetland habitats? Will it maintain or contribute towards an improved Water Framework Directive ecological status?	++	N/A	OS Basemap data.
	+	N/A	
	0	Facilities which use enclosed processes for waste management (such as Transfer Stations, Minerals Recycling Facilities, Mechanical Biological Treatment, Anaerobic digestion or 'in vessel' composting) are also not expected to affect this objective when in operation.	
	-?	Proposals for inert landfill sites or open air composting facilities that are adjacent to water bodies have the potential to lead to minor negative effects in relation to water quality and therefore biodiversity of aquatic habitats.	
	--?	Proposals for non-inert landfill sites that are adjacent to a water body could potentially lead to loss of contaminants or accidental pollution incidents would have potential significant negative effects on water quality and therefore biodiversity of aquatic habitats.	

IIA objective 8: Protect, enhance, and restore townscapes including open spaces

D.19 All potential site options could have adverse effects as townscape character and settings may be affected by the development of new waste management facilities, particularly if they fall within important views (known as Protected Vistas in the London Plan). It is noted that the design of modern waste management facilities is increasingly adopting innovative practice and could also enhance the townscape if it contains buildings of architectural interest and well-designed landscaping and green infrastructure. However, this would be very dependent on the exact nature and proposed design of the planned waste facility type, which would not be known until the planning

application stage, thus is not recorded in the site appraisal. It is assumed that sites within or adjacent to existing industrial estates should not have an effect on townscape character or quality or setting of settlements.

D.20 The assumptions outlined below are intended to provide a basis for screening for the potential for adverse effects on the landscape, but are uncertain as they would depend on the detailed design and layout proposals.

D.21 The following appraisal questions were not assessed in the site appraisal as it depends on the proposal (facility type, design, etc.), which would be assessed at the planning application stage:

- Will it provide for the restoration of land to an appropriate after-use including the creation of accessible greenspaces and open spaces at former waste sites?

Table D.6: IIA objective 8 assumptions and justifications for IIA effects

Appraisal Question	Effect	Justification / reasons for effect	Data sources
Will it minimise the visual intrusion of waste facilities on sensitive and/or distinct townscapes?	++	N/A	Protected Vistas from Planning Data Map Industrial estates: examination of OS base, plus SILs and LSISs from Planning Data Map.
	+	N/A	
	0	Potential sites which: Are within or adjacent to existing industrial estates, or not within a Protected Vista are considered to have no effect on these assets.	
	-	N/A	
	--?	Potential sites which: Are within a Protected Vista could have a significant negative effect.	
	++	N/A	

Appraisal Question	Effect	Justification / reasons for effect	Data sources
Will it enhance and protect townscape features including open spaces, parks and gardens and their settings?	+	N/A	Designated Open Space and MOL dataset from Planning Data Map.
	0	Potential sites which are: More than 250m from MOL and Designated Open Spaces. are not expected to have an effect on townscape features.	
	-	Potential sites which are: Within 250m of MOL and Designated Open Spaces. could have a negative effect on townscape features.	
	--	Potential sites which: Include MOL and Designated Open Spaces. could have a significant negative effect on townscape features, as development of the sites would either mean removing part of a park or open space.	

IIA objective 9: Protect and enhance the quality and quantity of watercourses and water bodies and maximise the efficient use of water

D.22 The Water Environment (Water Framework Directive) Regulations 2017 **[See reference** 174**]** apply to all surface freshwater bodies (including lakes, streams and rivers), groundwaters, groundwater dependent ecosystems, estuaries and coastal waters out to one mile from low-water. It aims to improve inland and coastal waters and protect them from diffuse pollution in urban and rural areas; increase the sustainable use of water as a natural resource and create better habitats for wildlife that lives in and around water. The extent to which a waste management facility will affect ground and surface water on a potential site depends on the type of facility used. Non-inert landfill sites that are in Source Protection Zone (SPZ) 1 or adjacent to a water body could potentially

lead to loss of contaminants or accidental pollution incidents. However, proposals for enclosed facilities are not expected to affect this objective as rainfall is unlikely to come into contact with the waste materials and water pollution is unlikely.

D.23 Although composting operations produce leachate, the enclosure of such facilities will reduce potential impacts. Standard design features of such facilities require that sites are surfaced adequately, drainage is segregated and containment principles are applied. Therefore, proposals for enclosed composting facilities are not expected to affect this objective, but open-air composting facilities might. Potential for adverse effects on water quality will also be assessed at the planning application stage. It will not be possible to assess water use and efficiency at this stage in the planning process, as it will very much depend on the proposal (facility type, design, etc), which would be assessed at the planning application stage.

D.24 The following appraisal question was not assessed in the site appraisal as it depends on the proposal (facility type, design, etc.), which would be assessed at the planning application stage:

- Will it maximise the efficient use of water?

Table D.7: IIA objective 9 assumptions and justifications for IIA effects

Appraisal Question	Effect	Justification / reasons for effect	Data sources
Will it protect the quantity of ground and surface water from over abstraction?	++	N/A	Source Protection Zones from the Environment Agency.
	+	N/A	
Will it protect and enhance the quality of watercourses and water bodies?	0	Potential site options which are: Located in SPZ3 ‘Source Catchment Protection Zone’ but not in any SPZ area are not expected to have an effect on this objective.	

Appraisal Question	Effect	Justification / reasons for effect	Data sources
		Facilities which use enclosed processes for waste management (such as Transfer Stations, Minerals Recycling Facilities, Mechanical Biological Treatment, Anaerobic digestion or 'in vessel' composting) are also not expected to affect this objective when in operation.	
	-	Potential site options which are: Located in SPZ 2 'Outer Protection Zone' Are considered likely to have a minor negative effect on this objective. Proposals for inert landfill sites or open air composting facilities that are adjacent to water bodies have the potential to lead to minor negative effects in relation to water quality.	
	--	Potential site options which are: Are located in SPZ1 'Inner Protection Zone' Are considered likely to have a significant negative effect on this objective. Proposals for non-inert landfill sites that are adjacent to a water body could potentially lead to loss of contaminants or accidental pollution incidents would have potential significant negative effects on water quality.	

IIA objective 10: Manage and reduce flood risk from all sources

D.25 NPPF Policy 14: Meeting the challenge of climate change, flooding and coastal change requires Local Authorities to take a risk based approach to proposals for development in or affecting flood-risk areas. Local Authorities

should apply a Sequential Test when allocating land in Local Plans to demonstrate that there are no reasonably available alternative sites in areas with a lower probability of flooding that would be appropriate for the type of development proposed. Local authorities should take a sequential approach to developing in areas at risk of flooding now or in the future. This means giving preference to locating development in Flood Zone 1, followed by Flood Zone 2 then Flood Zone 3; and on land of 1 in 1000 year flood risk, 1 in 100 year flood risk and then 1 in 30 year flood risk. The WLWP is supported by a Strategic Flood Risk Assessments (SFRA), which provide a finer level of detail than the EA Flood Zone maps in some areas.

Table D.8: IIA objective 10 assumptions and justifications for IIA effects

Appraisal Question	Effect	Justification / reasons for effect	Data sources
Will it promote the use of SuDS to reduce surface water runoff, nature-based solutions or other flood resilient design measures?	++	The development of SuDS on any of the potential site options would have a significant positive effect on reducing surface water run off in West London.	Critical Drainage Area or Local Flood Risk Zone from Planning Data Map.
	+	N/A	
	0	Potential sites which are: not within a Critical Drainage Area or Local Flood Risk Zone are not likely to have an effect on surface water flooding.	
	-	Potential sites which are: partially within a Critical Drainage Area or Local Flood Risk Zone could have a minor negative effect on surface water flooding.	
	--	Potential sites which are: entirely within a Critical Drainage Area or Local Flood Risk Zone could have a significant negative effect on surface water flooding.	
	++	N/A	

Appraisal Question	Effect	Justification / reasons for effect	Data sources
Will it ensure waste developments are not at risk of flooding both presently and in the future, taking into account climate change, and will it not result in an increase in the risk of flooding elsewhere?	+	N/A	Environment Agency Flood Zone data.
	0	Potential sites which are: Entirely within Flood Zone 1 are not expected to have an effect on flood-risk areas.	
	-	Potential sites which are: Partially or entirely within Flood Zone 2 could have a negative effect on flood-risk areas.	
	--	Potential sites which are: Partially or entirely within Flood Zone 3 could have a significant negative effect on flood-risk areas.	

IIA objective 11: Minimise noise, vibration, odour, light and air pollution relating to waste development

D.26 All of the potential types of facility could have a negative effect on protecting the amenity of local residents and communities. Some types of waste management technologies may result in potential odour, while all new waste management development would result in some level of noise, traffic, and light pollution during construction and potentially during operation as well. Appendix B of NPPW requires consideration of the suitability of the road network in testing the suitability of potential waste management sites, and the extent to which access would require reliance on local roads. It is considered that sites within 1km of the primary road network are generally likely to have better access and less impact on local roads travelling through residential areas. Proposals for all types of waste management facilities could lead to air pollution with regards to waste transportation by road, as well as any air pollution associated with the operation of the facility and processes used, such as dust and odour if waste is stored in open areas, bio-aerosols from biological process

and acid gases/CO2/dioxins and furans from thermal processes. The type and extent of air pollution (e.g. from dust or other emissions) will depend on the type of facility proposed on the site.

D.27 These impacts are uncertain as they will depend on the type of facility, its design and potential mitigation measures proposed, which would be assessed at the planning application stage. In addition, it is assumed that the facility will be well run and that mitigation measures implemented should be sufficient to avoid any potential amenity effects

D.28 Development of waste facilities will also need to meet the high standards of design and operation required to obtain the Environmental Permits (EP) regulated and enforced by the Environment Agency. Emissions limits are set by the Industrial Emissions Directive (IED) (2014), and waste management facilities are required under their EPs to operate within these limits **[See reference** 175**]**. The requirement to meet EP permitting standards (including emissions to air, land and water, energy efficiency, noise, vibration and heat and accident prevention) should ensure that design and operation of waste facilities minimises most of the potentially significant effects on health and amenity. In addition, many waste management facilities will meet the criteria that require a site-specific environmental impact assessment to be undertaken to accompany the planning application.

Table D.9: IIA objective 11 assumptions and justifications for IIA effects

Appraisal Question	Effect	Justification / reasons for effect	Data sources
Will it minimise pollution and impacts on amenity, including from noise, vibration, odour and light, from activities associated with waste developments and minimise the potential for such pollution,	++	N/A	Examination of OS base maps for existing residential areas,
	+	N/A	
	0	Potential sites which are: • Over 250m from sensitive receptors (i.e. residents, schools, hospitals, offices)	

Appraisal Question	Effect	Justification / reasons for effect	Data sources
particularly in areas already subject to noise and light pollution?		are expected to have no or negligible effects on amenity.	schools and hospitals
	-	N/A	
	--?	Potential sites which are: • Within 250m of sensitive receptors could have significant negative effects on amenity.	
Will it minimise air pollution and help achieve the objectives of Air Quality Management Plans, particularly within the designated AQMAs?	++	N/A	AQMA data from West London Waste Planning Authorities
	+	N/A	
	0	N/A	
	-?	All potential sites could have a minor negative impact on air pollution as LBs Brent, Ealing, Harrow, Hounslow, and Richmond upon Thames have designated Air Quality Management Areas (AQMAs) covering their entire boroughs, while the Hillingdon AQMA covers approximately three-quarters of the borough. The OPDC area spans parts of Brent, Ealing, and Hammersmith & Fulham, all of which have borough-wide AQMA. This effect is uncertain as it will depend on transport modes and routes used by the waste management facility, which would be assessed at the planning application stage.	
	--	N/A	

IIA objective 12: Protect and enhance mineral resources and soils

D.29 The WLWP aims to ensure that landfill is a 'minimised' when developing waste management facilities as supported by Policy WLWP 5 – Deposit of Waste on Land. All facility types that may be developed on potential site options

in the WLWP are therefore likely to have a minor positive effect by ensuring waste management occurs using processes higher up the waste hierarchy than landfill. However, the specific location of sites for these waste management facilities would have no effects on this objective as the effects depend on the type of facility that eventually gets proposed. Economic mineral resources in West London are limited, and only LB Hillingdon contains a Minerals Safeguarding Area.

D.30 According to NPPF Annexe 2, 'previously developed land is that which is or was occupied by a permanent structure, including the curtilage of the developed land.' Most industrial sites are likely to be on previously developed land, but there may be some sites on the edges of towns etc. that are greenfield sites and may even be on high quality agricultural land. NPPF Policy 15: Conserving and enhancing the natural environment states 'Planning policies and decisions should contribute to and enhance the natural and local environment by recognising the… benefits of natural capital and ecosystem services…of the best and most versatile agricultural land'.

Table D.10: IIA objective 12 assumptions and justifications for IIA effects

Appraisal Question	Effect	Justification / reasons for effect	Data sources
Will it ensure the safeguarding of mineral resources from sterilisation by waste management related development?	++	N/A	Minerals Safeguarding Areas shown on Planning Data Map
	+	N/A	
	0	Potential site options located outside Minerals Safeguarding Areas would have no effect on safeguarding reserves of these minerals. This is the case for most of the West London Waste authorities, except Hillingdon.	
	-	N/A	
	--?	Potential site options located within a Minerals Safeguarding Area within LB Hillingdon could have a significant negative effect on safeguarding	

Appraisal Question	Effect	Justification / reasons for effect	Data sources
		reserves of these exploitable minerals. The extent to which the effect is significant is uncertain as it depends on whether the whole of the site or part of the site is developed, and if some of the mineral is able to be extracted prior to the waste development.	
Will it safeguard soil quality and quantity and reduce soil contamination? Will it avoid the loss of the best and most versatile agricultural land?	++	N/A	Defra (ALC grades)
	+	All site options have the potential to indirectly achieve the safeguarding of soil quality and minimise the loss of the best and most versatile agricultural land as the development of waste management facilities (in particular recycling facilities and energy from waste facilities) could reduce the need for mineral extraction for landfill and associated landtake.	
	0	Potential site options which are: less than 1% agricultural land or contain only agricultural land of Grade 4 Are considered likely to have no effect on minimising the loss of the best and most versatile agricultural land.	
	-	Potential site options which are: between 1% and 50% Grade 2 & 3 agricultural land Are considered likely to have a negative effect on minimising the loss of the best and most versatile agricultural land.	
	--	Potential site options which are: greater than 50% Grade 2 or 3 agricultural land Are considered likely to have a significant negative effect on minimising the loss of the best and most versatile agricultural land.	
	++	N/A	Locally and Regionally important
	+	N/A	

Appraisal Question	Effect	Justification / reasons for effect	Data sources
Will it minimise effects on Regionally Important Geological Sites?	0	Potential site options which are: Located more than 500m from a Regionally Important Geological/Geomorphological Site (RIGS) Are not considered likely to affect this objective. Facilities which use enclosed processes for waste management (such as Transfer Stations, Minerals Recycling Facilities, Mechanical Biological Treatment, Anaerobic digestion or 'in vessel' composting) are also not expected to affect this objective when in operation.	Geological Sites from the Planning Data Map.
	-	Potential site options which are: Located less than 500m from Regionally Important Geological/Geomorphological Site (RIGS) Are considered likely to have a minor negative effect on this objective.	
	--	Potential site options which: Include or are less than 500m from a Regionally Important Geological/Geomorphological Site (RIGS) Are considered likely to have a significant negative effect on this objective.	

Appendix E

IIA findings for reasonable alternative policy approaches and site options

E.1 This appendix summarises the likely effects of the reasonable alternative policy approaches and the IIA findings of the emerging WLWP at Regulation 18 stage.

Likely effects of the reasonable alternative policy approaches

E.2 Chapter 4 provides an outline of the policy approaches considered for the WLWP. In summary, the four reasonable alternative policy approaches that were assessed as part of the emerging WLWP are set out below:

- Issue 1a, Option 3: Identify Areas of Search or site allocations for waste use (reasonable alternative to **Policy WLWP1 and WLWP2**)
- Issue 1b, Option 2: Continue to utilise facilities outside Plan area for management of residual waste (reasonable alternative to elements of **Policy WLWP1, WLWP2, WLWP3 and WLWP5**)
- Issue 1b, Option 3: Drive residual waste reduction to minimise exports (setting ambitious targets is a reasonable alternative to **Policy WLWP5 and WLWP6**)
- Issue 4b, Option 2: Require landscaping and protection and enhancement of biodiversity at existing waste sites (reasonable alternative to elements of **Policy WLWP4**)

E.3 Table E.12 below sets out the likely effects of the reasonable alternative policy approaches. The reasoning for the identification of these likely effects is set out by IIA objective below the table.

Table E.12: Summary of IIA findings for the reasonable alternative policy approaches to the emerging WLWP

IIA Objectives	Issue 1a, Option 3 Areas of Search or site allocations	Issue 1b, Option 2 External residual waste facilities	Issue 1b, Option 3 Ambitious targets for waste reduction	Issue 4b, Option 2 Landscaping and biodiversity
IIA1: Climate change mitigation	+	+/-	+	0
IIA2: Waste Hierarchy	++	-	++	0
IIA3: Economy	+?	-	+	+/-
IIA4: Health and wellbeing	+?	0	0	+?
IIA5: Sustainable transport	+	-	+	0
IIA6: Historic environment	0?	0	0	0
IIA7: Biodiversity and geodiversity	0?	0	0	+?

IIA Objectives	Issue 1a, Option 3 Areas of Search or site allocations	Issue 1b, Option 2 External residual waste facilities	Issue 1b, Option 3 Ambitious targets for waste reduction	Issue 4b, Option 2 Landscaping and biodiversity
IIA8: Open spaces and townscapes	0?	0	0	+?
IIA9: Water	0?	0	0	+?
IIA10: Flooding	0?	0	0	+?
IIA11: Noise, light and air pollution	+?	-	+/-	+?
IIA12: Mineral resources and soils	+/-?	0	0	+?

IIA objective 1: Minimise the WLWP's contribution to climate change and promote climate resilient infrastructure

E.4 Issue 1a, Option 3 is likely to have a minor positive effect in relation to this IIA objective as it seeks to identify land for new waste use in the Plan area, which would minimise the need to transport waste. Issue 1b, Option 3 is also likely to have a minor positive effect in relation to this IIA objective as it seeks to provide suitable infrastructure in order to minimise residual waste exports and provide efficient waste management within the Plan area in line with the waste hierarchy.

E.5 Issue 1b, Option 2 is expected to have mixed minor positive and minor negative effects as although it seeks to use existing suitable sites of high efficiency outside the Plan area, it would involve the increased transportation of waste.

IIA objective 2: Move treatment of waste up the Waste Hierarchy

E.6 Issue 1a, Option 3 and Issue 1b, Option 3 are likely to have significant positive effects in relation to this IIA objective as they would support moving waste management up the waste hierarchy and encouraging efficient waste management in the Plan area. Issue 1b, Option 2 is likely to have a minor negative effect as it continues to support management of residual waste through landfill or energy from waste facilities which are at the bottom end of the waste hierarchy.

IIA objective 3: Support, maintain and enhance the development of an inclusive economy

E.7 Issue 1a, Option 3 and Issue 1b, Option 3 are likely to have a positive effect in relation to this IIA objective as they all promote the efficient management of waste and the waste hierarchy within the Plan area. This could help increase job opportunities within the Plan area, and make these services more easily accessible to those living within the Plan area. The effects are uncertain for Issue 1a, Option 3 as the specific locations of Areas of Search or site allocations are not identified.

E.8 Issue 1b, Option 2 is likely to have a minor negative effect in relation to this IIA objective as it continues to utilise existing waste management facilities outside the Plan area and therefore will not generate further employment opportunities for local people.

E.9 Mixed minor positive and minor negative effects are expected for Issue 4b, Option 2, as requirements for the protection and enhancement of landscape and biodiversity may be costly to invest in, which may influence the profitability and viability of certain waste management practices with minor adverse effects against this objective. However, the improvements to the area may help improve the vitality of the area in general, with positive effects on the local economy.

IIA objective 4: Protect and improve people's health

E.10 Issue 4b, Option 2 is likely to have a positive (but uncertain) effect in relation to this IIA objective as it seeks to provide landscaping and biodiversity enhancement at existing waste management sites which could introduce planting and greenspace that may also provide space to sit and help improve mental wellbeing of employees. This effect is uncertain as how much landscaping and biodiversity enhancement may be possible to achieve is

unknown at this stage as it depends on the detailed design of a site that comes forward.

E.11 Issue 1a, Option 3 is likely to provide minor positive effects as the identification of areas of search and/or site allocations for waste management will help provide adequate waste capacity within West London to manage waste produced. This may reduce instances of fly tipping, which would have a minor positive effect on this IIA objective. Effects are uncertain depending on the location of new sites.

IIA objective 5: Manage waste close to the source and promote sustainable modes of transport

E.12 Issue 1b, Option 2 is likely to have a minor negative effect in relation to this IIA objective as it is less aligned with the proximity principle and would not reduce transport distances as it would continue to transport residual waste outside the Plan area.

E.13 Issue 1a, Option 3 and Issue 1b, Option 3 are likely to have a positive effect in relation to this IIA objective as they seek to minimise exports of residual waste beyond the Plan area and so there is opportunity for promotion of sustainable transport and greater adherence to the proximity principle.

IIA objective 6: Protect and enhance the historic environment

E.14 All options are expected to have negligible effects in relation to this IIA objective. The effect identified for Issue 1a Option 3 is uncertain as it is dependent on the actual sites which would be allocated and whether those sites could conserve, protect and enhance the historic environment.

IIA objective 7: Protect, enhance, restore, and expand biodiversity and geodiversity assets

E.15 Issue 4b, Option 2 is likely to have a minor positive effect in relation to this IIA objective, although it is uncertain as it will depend on the specific design of a development coming forward which is unknown at this stage. This option promotes the opportunity for enhancement of sites with respect to biodiversity.

E.16 The remaining options are expected to have negligible effects in relation to this IIA objective. The effect identified for Issue 1a Option 3 is uncertain as it is dependent on the actual sites which would be allocated and whether those sites could conserve, protect and enhance biodiversity.

IIA objective 8: Protect, enhance, and restore townscapes including open spaces

E.17 Issue 4b, Option 2 is likely to have a minor positive effect in relation to this IIA objective, although it is uncertain as it will depend on the specific design of a development coming forward which is unknown at this stage. This option promotes the opportunity for landscaping and biodiversity enhancements within waste sites which would be positive for townscapes and could provide small areas of open space.

E.18 The remaining options are expected to have negligible effects in relation to this IIA objective. The effect identified for Issue 1a Option 3 is uncertain as it is dependent on the actual site which is allocated and whether that site could conserve, protect and enhance townscape character and open spaces.

IIA objective 9: Protect and enhance the quality and quantity of watercourses and water bodies and maximise the efficient use of water

E.19 Issue 4b, Option 2 is likely to have a positive effect in relation to this IIA objective, as it promotes the opportunity for landscape and biodiversity enhancement of sites, including incorporation of green roofs. This would also introduce some permeable surfaces into waste sites. This may help improve water quality by intercepting pollutants in surface water runoff. Therefore, minor positive effects are identified but this is uncertain depending on the site.

E.20 The remaining options are expected to have negligible effects on this IIA objective. The effect identified for Issue 1a Option 3 is uncertain as it is dependent on the actual site which is allocated and the impact that site could have on the water environment.

IIA objective 10: Manage and reduce flood risk from all sources

E.21 Issue 4b, Option 2 is likely to have a positive effect in relation to this IIA objective, as it promotes the opportunity for landscaping and biodiversity enhancement of sites (e.g. through planting, green roofs). Increased permeable surfaces would help to reduce surface water runoff and may help reduce flood risk. However, this effect is uncertain as it will depend on the specific design of a development coming forward which is unknown at this stage.

E.22 The remaining options are expected to have negligible effects in relation to this IIA objective. The effect identified for Issue 1a Option 3 is uncertain as it is dependent on the actual site which is allocated and how that site may impact flood risk.

IIA objective 11: Minimise noise, vibration, odour, light and air pollution relating to waste development

E.23 Issue 1a, Option 3 and Issue 4b, Option 2 are expected to have minor positive effects on this IIA objective. The support for landscaping and biodiversity enhancements, and requirement for appropriate mitigation measures to be applied within any areas of search or site allocations may help reduce the effects of various types of pollution associated with waste sites. These effects are uncertain depending on the site and proposals brought forward.

E.24 Issue 1b, Option 2 is expected to have minor negative effects on this IIA objective as it will encourage the transport of waste to areas outside the Plan area which may result in increased vehicle emissions and reductions in local air quality.

E.25 Issue 1b, Option 3 is likely to have a mixed effect as existing waste management facilities may need to be adapted to meet waste reduction and recycling targets in order to reduce residual waste exports. Whilst there are positive effects which may be obtained by reducing transport movements and improving local air quality, there may be negative effects as a result of increased noise and vibration associated with increased operations.

IIA objective 12: Protect and enhance mineral resources and soils

E.26 Issue 1a, Option 3 promotes the identification of areas of search or site allocations for waste use. There is some potential for this to result in new waste sites being allocated on greenfield land, which could have adverse effects on soil resources and could result in mineral sterilisation depending on location. However, the option considered was to focus any areas of search or site allocations within SIL, LSISs or underutilised previously developed land, which would be a more efficient use of land and would help prevent adverse effects on

soil. Therefore, mixed minor positive and minor negative effects are identified for this IIA objective, but these are uncertain depending on locations of any areas of search or site allocations were they to be identified.

E.27 Issue 4b, Option 2 is expected to have minor positive effects on this IIA objective, as it promotes landscaping and biodiversity enhancement on waste sites, which would help improve soil structure and quality. These effects are uncertain depending on the site and proposals brought forward.

E.28 The remaining options are likely to have a negligible effect on this objective.

IIA findings for the potential site options in the WLWP

IIA objective 1: Minimise the WLWP's contribution to climate change and promote a climate resilient infrastructure

Table E.2: Summary of IIA findings for the potential site options in relation to IIA objective 1

Appraisal Question	High View Farm	McGovern Plant/ Wet Waste
Will it [the proposed site] promote energy efficiency by encouraging the use of energy efficient buildings	**0**	**0**

Appraisal Question	High View Farm	McGovern Plant/ Wet Waste
and plant, and the use of appropriate renewable or low carbon energy sources on waste sites?		

E.29 Currently neither of the site options involve waste processes that recover energy from waste, therefore will have no effect on IIA objective 1. The effect of the site options on transport related climate effects is assessed under IIA objective 5 below.

IIA objective 2: Move treatment of waste up the Waste Hierarchy

Table E.3: Summary of IIA findings for the potential site options in relation to IIA objective 2

Appraisal Question	High View Farm	McGovern Plant/ Wet Waste
Will it promote the re-use, recycling and recovery of waste in accordance with the waste hierarchy? Will it contribute to minimising disposal of all forms of waste, across the WLWP area and across the wider London area? Will it contribute to the aim in the London Plan of a zero waste city by 2050?	+?	+?

Appraisal Question	High View Farm	McGovern Plant/ Wet Waste
Will it promote a circular low carbon economy within the WLWP area, and within London?	+?	+?
Will it support community engagement and education to empower local communities to take action to reduce waste?	+?	+?

E.30 The specific location of these promoted waste sites would not have an effect on IIA Objective 2: Waste Hierarchy as the effect entirely depends on the type of facility on the site, not where it is located. Waste facilities on both site options are likely to have minor positive effects on this objective as the promoted waste uses (recycling and composting at High View Farm and waste recovery at the Wet Waste site) will ensure that waste management occurs using processes higher up the waste hierarchy than landfill. Both sites are therefore expected to contribute to promoting a circular economy. Both sites have been scored a minor positive effect with uncertainty due to the magnitude of the effect being dependent on the final design of the waste facilities.

E.31 From the information provided by the site promoters it seems unlikely that these waste facilities will contain education centres for the local communities, however the operation of the sites will provide employment opportunities, therefore a minor positive effect is also expected for IIA Objective 2: Waste Hierarchy, in relation to local community engagement.

IIA objective 3: Support, maintain and enhance the development of an inclusive economy

Table E.4: Summary of IIA findings for the potential site options in relation to IIA objective 3

Appraisal Question	High View Farm	McGovern Plant/ Wet Waste
Will it generate employment opportunities in the waste and resource sector for local people, especially within areas of deprivation, providing opportunities to improve local skills?	++?	++?

E.32 The operation of recycling, composting or wet waste recovery facilities on either of the site options could have positive effects on providing a source of raw materials and some level of employment. However, because the specific type of waste development that may occur on the High View Farm site will not be confirmed until planning applications come forward, the effect is uncertain. It has been indicated that High View Farm will provide composting and recycling facilities. The McGovern Plant/ Wet Waste is already operational and manages non-hazardous construction, commercial and municipal sludges and effluent, which will involve separating organics, aqueous solutions and mineral wastes to promote waste recovery and therefore creation of secondary raw materials. Additionally, both sites could generate employment opportunities, but this is uncertain for the McGovern/ Wet Waste site as this is already operational, it is therefore unknown if new opportunities will arise in terms of employment. Therefore, both site options are expected to have uncertain significant positive effects for IIA Objective 3: Economy.

IIA objective 4: Protect and improve people's health

Table E.5: Summary of IIA findings for the potential site options in relation to IIA objective 4

Appraisal Question	High View Farm	McGovern Plant/ Wet Waste
Will it avoid or minimise adverse effects on human health and safety, including disproportionate impacts on communities, including those with protected characteristics, mental health vulnerabilities, and those in more deprived areas?	-	-
Will it provide opportunities to improve health and amenity through delivery of green infrastructure, enhanced public rights of way and improved access to recreation as part of the restoration of sites, or provision of biodiversity net-gain in any redeveloped sites? Will it promote public access and engagement with green and blue spaces? Will it avoid or minimise adverse effects on the quality and extent of existing recreational assets?	--	-

E.33 Developing large-scale waste management facilities has potential to have negative impacts on the amenity and health of local communities, for example

through noise and odour and release of biospores or gaseous emissions. The precise magnitude of the impacts will vary depending on the type of waste facility and nature of the process. However, both site options are not located within 250m of any sensitive receptors (i.e. residents, schools, hospitals, offices). Although, both sites are located within the 30% most deprived areas nationally. The waste management facilities may therefore have a disproportionate effect on the health of more deprived or vulnerable communities in the local area. Minor negative effects are expected for IIA objective 4: Health and Wellbeing in relation to the most deprived populations.

E.34 High View Farm is located within Colne Valley Regional Park and borders a PRoW. As this could directly affect recreational users of these amenities and green public space, significant negative effects are expected for IIA Objective 4: Health and Wellbeing, albeit these are likely to be short term and temporary due to the nature of recreational use of the Regional Park and PRoW. McGovern Plant/Wet Waste is not within or adjacent to recreational facilities but is located within 250m of sports facilities and a golf course to the south of the site, therefore minor negative effects are likely for IIA Objective 4: Health and Wellbeing. However, it is assumed that any new facilities permitted and developed on the High View Farm site, in addition to the already operational McGovern Plant/Wet Waste will be well run in accordance with the Environmental Permitting regime regulated by the Environment Agency. In addition, mitigation measures required in the WLWP such as by policy WLWP 2: Provision and Additional Waste Management Capacity will be successfully implemented to help reduce any adverse effects on health and amenity.

IIA objective 5: Manage waste close to the source and promote sustainable modes of transport

Table E.6: Summary of IIA findings for the potential site options in relation to IIA objective 5

Appraisal Question	High View Farm	McGovern Plant/ Wet Waste
Will it reduce reliance on road-based freight movements and support the use of rail and water where this represents a deliverable, efficient and sustainable choice? Will it manage waste as close to source as possible? Will it support an overall reduction in the distance travelled by waste, either within the WLWP area or across the wider London area?	--	--

E.35 Both site options are located greater than 500m from a rail depot or wharf and are therefore considered to have a negative effect on reducing reliance on road freight and increasing the efficient use of rail and sustainable transport methods. Therefore, IIA Objective 5: Sustainable transport is expected to receive significant negative effects for both High View Farm and McGovern Plant/Wet Waste.

IIA objective 6: Protect and enhance the historic environment

Table E.7: Summary of IIA findings for the potential site options in relation to IIA objective 6

Appraisal Question	High View Farm	McGovern Plant/ Wet Waste
Will it conserve, protect and enhance designated and undesignated heritage assets and their settings?	-	0

E.36 The West London area contains numerous designated and undesignated heritage assets, such as Conservation areas, Listed Buildings and Scheduled Monuments, which contribute to the historic environment and character of the area. The potential waste sites were assessed in relation to their proximity to these historic assets. The significance of a heritage asset can be harmed or lost through alteration of the asset's setting, therefore the potential waste sites located close to a heritage asset are highlighted as having potential negative effects. High View Farm is located 7m north of St. Leonards Farmhouse, which is a Grade II Listed Building and is therefore expected to have a minor negative effect on IIA Objective 6: Historic Environment. However, the closest historic asset to McGovern Plant/Wet Waste is the Grade II Listed Baber Auxiliary Bridge, located 247m south of the site. As this is beyond the threshold criteria used for highlighting a potential negative effect, negligible effects are likely for McGovern Plant/Wet Waste for this objective.

E.37 Development could potentially enhance the significance of the asset provided that the development makes a positive contribution to the asset. This

is particularly relevant to the High View Farm site as the effect will be influenced by the specific proposal for this site including the design of the development, which is unknown at this stage.

IIA objective 7: Protect, enhance, restore, and expand biodiversity and geodiversity assets

Table E.8: Summary of IIA findings for the potential site options in relation to IIA objective 7

Appraisal Question	High View Farm	McGovern Plant/ Wet Waste
Will it avoid effects on habitats of international, national, regional or local importance? Will it protect and enhance habitats of international, national, regional or local importance? Will it protect and improve local populations of terrestrial species that are of international, national, regional or locally importance? Will it avoid harm, protect, and improve local populations of aquatic and wetland species that are of international, national, regional or local importance?	-?	--?
Will it avoid negative impact on water quality and therefore biodiversity	0	-?

Appraisal Question	High View Farm	McGovern Plant/ Wet Waste
particularly within aquatic/wetland habitats? Will it maintain or contribute towards an improved Water Framework Directive ecological status?		

E.38 The impact of development at each site will depend on factors such as the presence of protected species and habitats, the characteristics of the site and the type of facility to be developed. Minor negative effects are expected for High View Farm in relation to IIA Objective 7: Biodiversity and Geodiversity. This is because High View Farm borders Ruislip Woods which is a SSSI and a Nature Conservation Site of Metropolitan Importance (NCSMI), the site is also within 500m of Newyears Green Covert, also a NCSMI. McGovern Plant/Wet Waste directly adjoins the Crane Corridor Site of Important Nature Conservation (SINC) (of Metropolitan Importance) to the west and is within 500m of Hounslow Heath, which is a Local Nature Reserve, thus significant negative effects are expected. Additionally, minor negative effects are expected for this site with regards to the water quality that affects aquatic ecosystems, as the site is adjacent to the River Crane, which may be adversely affected due to the potential for run-off from the waste washing processes at the site. However, High View Farm is unlikely to affect water quality as it is not adjacent to any water bodies.

E.39 The effects on these designated sites are uncertain as it depends on the foraging, roosting or breeding species on the nature conservation sites, and the extent to which the site design, layout and operational processes results in habitat fragmentation, air or water pollution. However, mitigation may avoid these effects, depending on how the waste facility is managed. Opportunities may be created to promote habitat connectivity if new developments include green infrastructure. It is also expected that the development of waste facilities on these potential sites will be well run in accordance with the Environmental

Permitting regime regulated by the Environment Agency. In addition, mitigation measures required in the WLWP such as by policy WLWP 4: Ensuring high quality and resilient waste facilities will be successfully implemented to help reduce any adverse effects on biodiversity and geodiversity.

IIA objective 8: Protect, enhance, and restore townscapes including open spaces

Table E.9: Summary of IIA findings for the potential site options in relation to IIA objective 8

Appraisal Question	High View Farm	McGovern Plant/ Wet Waste
Will it minimise the visual intrusion of waste facilities on sensitive and/or distinct townscapes?	**0**	**0**
Will it enhance and protect townscape features including open spaces, parks and gardens and their settings?	**?**	**0**

E.40 Both site options are not located within a protected vista or an area of visual impact, in West London. Additionally, McGovern Plant/Wet Waste is within a particularly industrial setting, which should also avoid adverse effects on the local townscape. Therefore, both site options are expected to have negligible effects for IIA objective 8: Open spaces and townscapes in terms of visual impacts. Nonetheless, these scores come with a level of uncertainly, particularly for High View Farm as the effect is dependent on the final design of

the facilities which could enhance the townscape with well-designed landscaping or green infrastructure.

E.41 Both site options are not located within 250m of designated open space which includes MOL and other designated public open space areas, although it is noted that High View Farm is within the Colne Valley Regional Park albeit that this is not a designated public open space. Therefore, there is not expected to be any adverse effects on townscape features and their settings but the impact of High View Farm is noted as being uncertain.

IIA objective 9: Protect and enhance the quality and quantity of watercourses and water bodies and maximise the efficient use of water

Table E.10: Summary of IIA findings for the potential site options in relation to IIA objective 9

Appraisal Question	High View Farm	McGovern Plant/ Wet Waste
Will it protect the quantity of ground and surface water from over abstraction? Will it protect and enhance the quality of watercourses and water bodies?	-	0

E.42 Development of waste sites close to source protection zones (SPZ) has the potential to have negative effects on protecting ground water for human consumption. This is because of the potential loss of contaminants, accidental pollution incidents or risk of leachate to the surrounding environment. High View

Fam is likely to have minor negative effects for Objective 9: Water, due to the site being located within an SPZ 2 ‘Outer Protection Zone’. This site is also proposed to have open air composting facilities which may also lead to negative effects on the surrounding areas water quality. McGovern Plant/Wet Waste site is expected to receive negligible effects in relation to this objective because the site is located in an SPZ 3 source catchment protection zone, but not within an outer or inner protection zone (SPZ 1 or 2).

IIA objective 10: Manage and reduce flood risk from all sources

Table E.11: Summary of IIA findings for the potential site options in relation to IIA objective 10

Appraisal Question	High View Farm	McGovern Plant/ Wet Waste
Will it promote the use of SuDS to reduce surface water runoff, nature-based solutions or other flood resilient design measures?	-	0
Will it ensure waste developments are not at risk of flooding both presently and in the future, taking into account climate change, and will it not result in an increase in the risk of flooding elsewhere?	0	0

E.43 Sustainable Urban Drainage Systems (SUDs) are not part of the proposals for either site, nonetheless, this could change at the planning application stage, which would promote positive effects for IIA objective 10: Flooding. At this

stage, High View Farm is partially located in a Critical Drainage Area/Local Flood Risk Zone. Development of waste facilities here could have a negative effect on surface water flooding as there would be an increase of impermeable surfaces and this would increase runoff. Consequently, High View Farm is likely to have minor negative effects for this objective in relation to surface water flooding. However, as McGovern Plant/Wet Waste is not located in a Critical Drainage Area/ Local Flood Risk Zone, negligible effects are expected for this objective.

E.44 Both site options are located within Flood Zone 1 so are not at risk of flooding from fluvial sources. Therefore, both site options are expected to receive negligible effects for IIA objective 10: Flooding in terms of present and future flood risk.

IIA objective 11: Minimise noise, vibration, odour, light and air pollution relating to waste development

Table E.12: Summary of IIA findings for the potential site options in relation to IIA objective 11

Appraisal Question	High View Farm	McGovern Plant/ Wet Waste
Will it minimise pollution and impacts on amenity, including from noise, vibration, odour and light, from activities associated with waste developments and minimise the potential for such pollution, particularly in	**0**	**0**

Appraisal Question	High View Farm	McGovern Plant/ Wet Waste
areas already subject to noise and light pollution?		
Will it minimise air pollution and help achieve the objectives of Air Quality Management Plans, particularly within the designated AQMAs?	0	-?

E.45 Both site options are not located within 250m of any sensitive receptors. Thus, negligible effects are expected in relation to the effect of the waste facilities on amenity including, noise, vibration, odour and light, from activities associated with waste. Additionally, because High View Farm is not located in an AQMA, negligible effects are also likely for this objective in relation to air pollution. However, a minor negative effect was identified for the McGovern Plant/Wet Waste site as the whole of Hounslow Borough is located in an AQMA. The magnitude of the effect will depend on transport modes and routes used by the waste management facility. Therefore, the effect is uncertain.

IIA objective 12: Protect and enhance mineral resources and soils

Table E.13: Summary of IIA findings for the potential site options in relation to IIA objective 12

Appraisal Question	High View Farm	McGovern Plant/ Wet Waste
Will it ensure the safeguarding of mineral resources from sterilisation by waste management related development?	0	0
Will it safeguard soil quality and quantity and reduce soil contamination? Will it avoid the loss of the best and most versatile agricultural land?	-	+
Will it minimise effects on Regionally Important Geological Sites?	0	N/A

E.46 Hounslow Borough does not contain any RIGs and High View Farm is located over 500m from the only RIGs site in Hillingdon, therefore negligible effects are expected for IIA Objective 12: Mineral resources and soils with regards to the proposed waste sites' effects on geological sites. Similarly, neither of the site options are located within a mineral safeguarded area and negligible effects are consequently expected for safeguarding minerals for this objective.

E.47 However, as McGovern Plant/Wet Waste is located in non-agricultural land, this site has the potential to indirectly achieve the safeguarding of soil quality and minimise the loss of the best and most versatile agricultural land as the development of waste management facilities could reduce the need for mineral extraction and associated land take. Thus, a minor positive effect is expected for IIA Objective 12: Mineral resources and soils. Conversely, High View Farm is located in agricultural grade 3 classified land, which is likely to cause a negative impact and loss of some of the best and most versatile agricultural land. Minor negative effects are expected for High View Farm for this objective.

Previous IIA findings for the emerging WLWP (Regulation 18)

E.48 This section presents the IIA findings of the emerging WLWP at Regulation 18 stage and the recommendations made at that stage.

E.49 The Regulation 18 WLWP set out a vision and five strategic objectives:

- Strategic Objective 1: Make Best Use of Existing Waste Infrastructure to Manage Waste Efficiently.
- Strategic Objective 2: Enable facilities to come forward that contribute to the achievement of a Circular Economy.
- Strategic Objective 3: Decarbonise Waste Transport and Processing.
- Strategic Objective 4: Deliver High Quality Waste Facilities that Protect and Enhance the Local Environment and Communities.
- Strategic Objective 5: Ensure sufficient capacity of the right type in the right place so that unavoidable residual waste produced is managed safely and effectively.

E.50 There were six strategic policies set out in the emerging WLWP. The policies were:

- Policy WLWP 1 –Safeguarding and Optimising Waste Site Network
- Policy WLWP 2 – Provision of Additional Waste Management Capacity
- Policy WLWP 3 – Residual Waste Management & Energy Recovery
- Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities
- Policy WLWP 5 – Deposit of Waste on Land
- Policy WLWP 6 – Circular Economy and Resource Efficiency

Likely effects of the overarching vision and strategic objectives

E.51 Given the clear aspirational relationship between the overarching vision and five strategic objectives, these two components of the WLWP Regulation 18 document were appraised together. **Table E14** below sets out the likely effects of the vision and strategic objectives at Regulation 18 stage.

Table E.14: Summary of IIA findings for the emerging WLWP (Regulation 18) Vision and Strategic Objectives

IIA Objectives	Overarching Vision	Strategic Objective 1: Make Best Use of Existing Waste Infrastructure to Manage Waste Efficiently	Strategic Objective 2: Encourage Facilities that Contribute to the Achievement of a Circular Economy to come forward	Strategic Objective 3: Decarbonise Waste Transport and Processing	Strategic Objective 4: Deliver High Quality Waste Facilities (Protect and Enhance the Environment and Communities)	Strategic Objective 5: Ensure sufficient capacity of the right type in the right place so that unavoidable residual waste produced is managed safely and effectively
IIA1: Climate change mitigation	++	+	+	++	+	+/-
IIA2: Waste hierarchy	++	++	++	++	0	-
IIA3: Economy	+	+	+	0	+	0
IIA4: Health and wellbeing	+	+	+	+	+	+

IIA Objectives	Overarching Vision	Strategic Objective 1: Make Best Use of Existing Waste Infrastructure to Manage Waste Efficiently	Strategic Objective 2: Encourage Facilities that Contribute to the Achievement of a Circular Economy to come forward	Strategic Objective 3: Decarbonise Waste Transport and Processing	Strategic Objective 4: Deliver High Quality Waste Facilities (Protect and Enhance the Environment and Communities)	Strategic Objective 5: Ensure sufficient capacity of the right type in the right place so that unavoidable residual waste produced is managed safely and effectively
IIA5: Sustainable transport	++	+	+	++	0	+
IIA6: Historic environment	0	0	0	0	+?	+?
IIA7: Biodiversity and geodiversity	0	0	0	0	+?	+?
IIA8: Open spaces and townscapes	0	+	0	0	+?	+?
IIA9: Water	0	0	0	0	+?	+?
IIA10: Flooding	+	0	0	0	+?	0

IIA Objectives	Overarching Vision	Strategic Objective 1: Make Best Use of Existing Waste Infrastructure to Manage Waste Efficiently	Strategic Objective 2: Encourage Facilities that Contribute to the Achievement of a Circular Economy to come forward	Strategic Objective 3: Decarbonise Waste Transport and Processing	Strategic Objective 4: Deliver High Quality Waste Facilities (Protect and Enhance the Environment and Communities)	Strategic Objective 5: Ensure sufficient capacity of the right type in the right place so that unavoidable residual waste produced is managed safely and effectively
IIA11: Noise, light and air pollution	++	+	+	+	+?	+?
IIA12: Mineral resources and Soils	+	+	0	0	+?	-

Likely effects of the policies

E.52 The likely sustainability effects of the policies in the Regulation 18 WLWP are set out in **Table E.15** below.

Table E.15: Summary of the IIA findings of the policies for the emerging WLWP (Regulation 18)

IIA Objectives	Policy WLWP 1 –Safeguarding and Optimising Waste Site Network	Policy WLWP 2 – Provision of additional Waste Management Capacity	Policy WLWP 3 – Residual Waste Management & Energy Recovery	Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities	Policy WLWP 5 – Deposit of Waste on Land	Policy WLWP 6 – Circular Economy and Resource Efficiency
IIA1: Climate change mitigation	+	+/-	+/-	++	+/-	+
IIA2: Waste Hierarchy	++	++	+/-	-	+/-	++
IIA3: Economy	+	+	+	-	+?	+
IIA4: Health and wellbeing	+	+	+	++/-?	+?	+?
IIA5: Sustainable transport	+	+/-	+/-?	+	0	+
IIA6: Historic environment	0?	+/-?	-?	++/-?	+/-?	0

IIA Objectives	Policy WLWP 1 –Safeguarding and Optimising Waste Site Network	Policy WLWP 2 – Provision of additional Waste Management Capacity	Policy WLWP 3 – Residual Waste Management & Energy Recovery	Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities	Policy WLWP 5 – Deposit of Waste on Land	Policy WLWP 6 – Circular Economy and Resource Efficiency
IIA7: Biodiversity and geodiversity	0?	+/-?	-?	++/-?	+/-	0
IIA8: Open spaces and townscapes	0?	+/-?	-?	++/-?	+/-	+?
IIA9: Water	0?	+/-?	-?	+/-	+/-	0
IIA10: Flooding	0?	+/-?	-?	+	+/-	0
IIA11: Noise, light and air pollution	+	+/-?	+/-?	+	+/-	0
IIA12: Mineral resources and Soils	+	+	-	+/-?	+	+

Recommendations

E.53 As part of the Regulation 18 process, the IIA and HRA team had the opportunity to review earlier drafts of the policies and make recommendations for amendments as the policies were developed. The recommendations at the time of the emerging Regulation 18 WLWP included:

- Making Policy WLWP 2 clearer that it applied to any waste redevelopment or new development proposals whether on existing safeguarded sites or in new locations.
- Strengthening Policy WLWP 4 and augmenting the topics covered to help with mitigating potential effects of new waste development.

E.54 Although some potential minor negative effects were identified for the emerging WLWP policies included in the Regulation 18 plan, it was recognised that waste proposals coming forward would also need to be in conformity with the development management policies in each borough's and OPDC's Local Plans, as well as the London Plan. Therefore, in order to avoid duplicating requirements in relation to issues such as biodiversity protection and enhancement, use of green infrastructure and SuDS, protection and enhancement of the historic environment etc., the IIA did not have any further recommendations to make for the emerging Regulation 19 WLWP policies.

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