

Integrated Impact Assessment for the West London Waste Plan

Regulation 19 Consultation

West London Waste Planning Authorities

Final report

Prepared by LUC

May 2026

Version	Status	Prepared	Checked	Approved	Date
1	Draft	E Westcott G Currie	T Livingston	T Livingston	06/05/2026
2	Final	E Westcott G Currie	T Livingston	T Livingston	14/05/2026



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Registered in England. Registered number 2549296. Registered office: 250 Waterloo Road, London SE1 8RD. Printed on 100% recycled paper

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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.

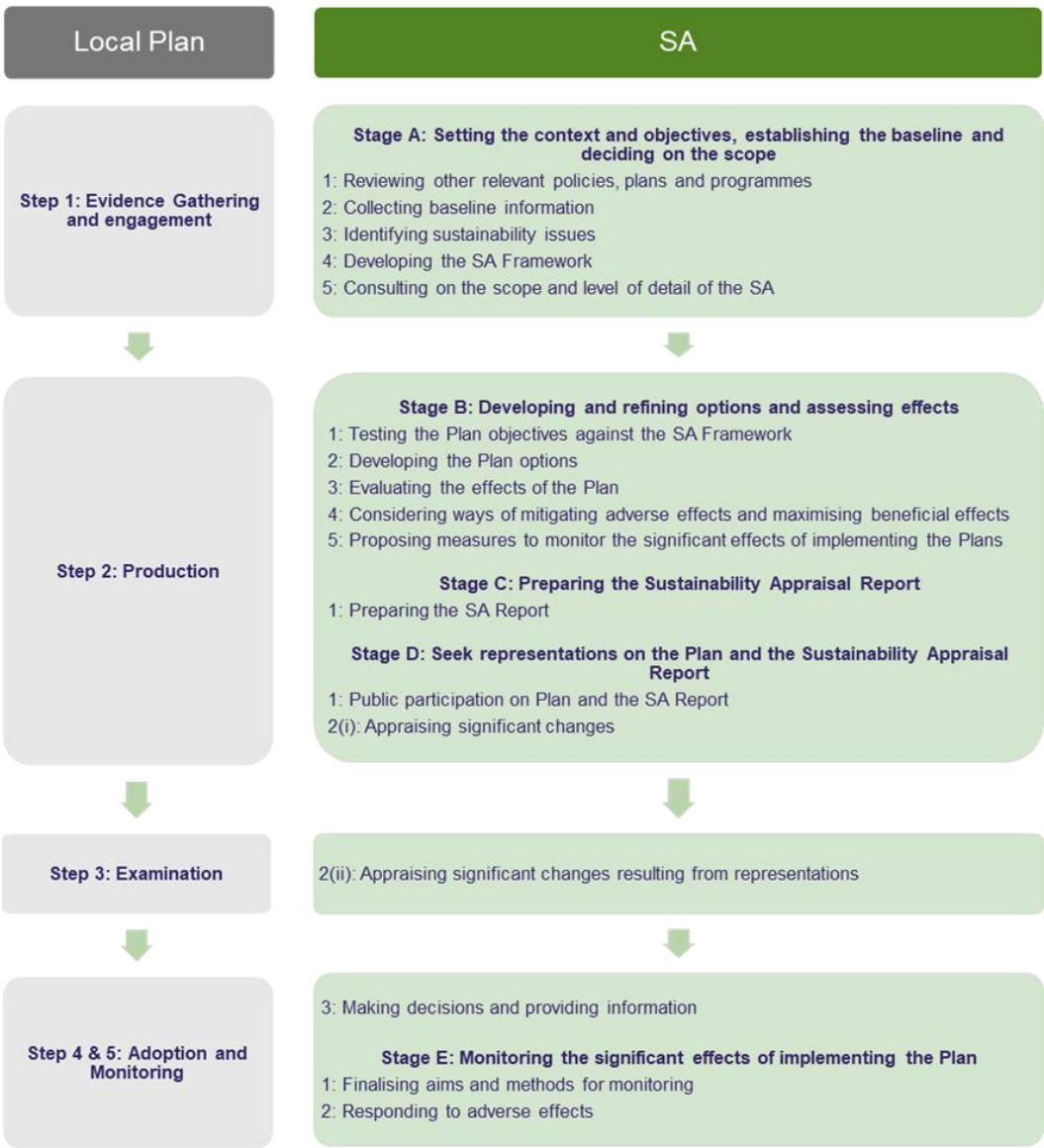
- **Chapter 5** presents the IIA findings, including the EqlA and HIA for the various elements of the Regulation 19 WLWP, including the vision, objectives and updated policies.
- **Chapter 6** describes the cumulative effects of the WLWP considered in terms of the plan as a whole, and in relation to 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 policies, 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 2021/22 & 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)
Edgware 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 (SINICs) 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. SINICs 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 NO₂ 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 NO₂ 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 routing 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, SINCE, 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 Vision 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
IJA1: Climate change mitigation	+	+/-	+/-	++	+/-	+	+?
IJA2: Waste Hierarchy	++	++	+/-	+/-	+/-	++	+
IJA3: Economy	+	+	+	-	+	+	+
IJA4: Health and wellbeing	+	+	+	++/-?	+	+	+
IJA5: Sustainable transport	+	+/-	+/-?	+	0	+	+
IJA6: 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 sites. 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-configured 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

Appendix A Review of relevant plans, policies and programmes

- 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.

Appendix A Review of relevant plans, policies and programmes

- 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:

Appendix A Review of relevant plans, policies and programmes

- 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 and 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 waste 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.

Appendix A Review of relevant plans, policies and programmes

- 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.

Appendix A Review of relevant plans, policies and programmes

- 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, SINC's 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 SINC's, 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

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
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.

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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.

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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

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
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 policies 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.

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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).

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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.

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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.)

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
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 CO₂ 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 (CO₂) 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 CO₂ 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, CO₂ 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: CO₂ 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 11,027.2ktoe. 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 (MtCO₂) for the period of 2020 to 2100. At 2017 CO₂ emission levels, London would use this entire budget within 7 years from 2020.
- Initiate an immediate programme of CO₂ 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 CO₂ reduction pathway that stays within the recommended maximum carbon budget of 203.5 MtCO₂. At 2043 5% of the budget remains. This represents very low levels of residual CO₂ 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 CO₂ emissions are also within the recommended budget, provided that interim budgets with lower cumulative CO₂ 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 CO₂ 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 CO₂ 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. CO₂ 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 planned 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 ratio 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 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;

Appendix C Baseline Information

- 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 SINC 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 SINC 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 SINC sites 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 SINC's 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 SINC's 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 SINC's, the expansion of areas or removal of areas from existing SINC's, and a change in the SINC status, as well as the amalgamation and renaming of existing SINC's.

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 SINC's within the OPDC area are designated under the OPDC Local Plan [\[See reference 158\]](#). In total across the OPDC, there are 19 SINC's. 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 NO₂ 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 NO₂. In 2023, this reduced to just 22 hours, a reduction of 99% in the number of hours when NO₂ 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 NO_x, PM_{2.5}, and CO₂ has reduced. Specifically, ULEZ policies were estimated to have reduced nitrogen oxides (NO_x) 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:

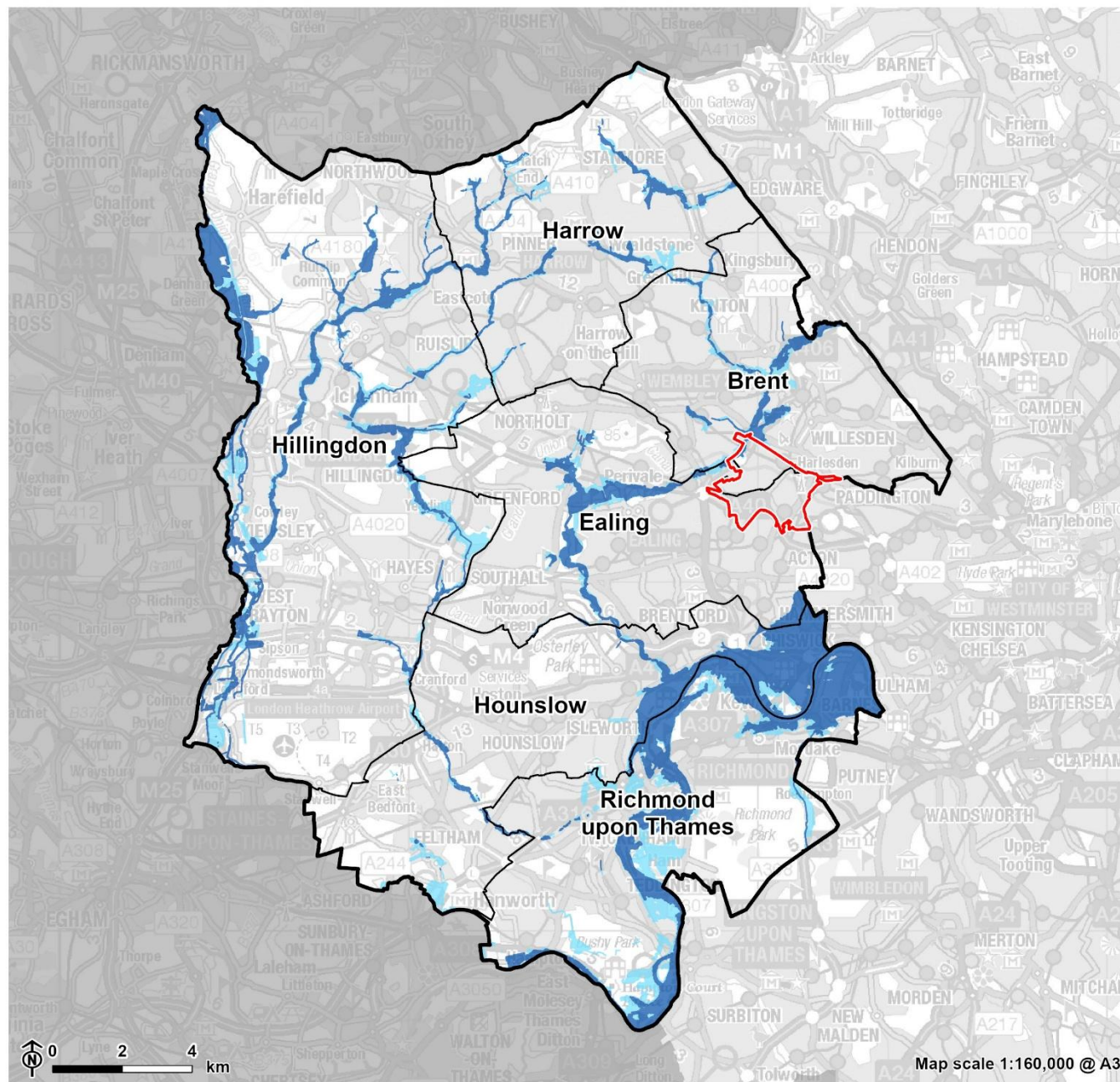
- Brent AQMA declared in 2006 for Nitrogen dioxide NO₂ and Particulate Matter PM₁₀
- Ealing AQMA declared in 2000 for Nitrogen dioxide NO₂ and Particulate Matter PM₁₀
- Harrow AQMA declared in 2002 for Nitrogen dioxide NO₂ and Particulate Matter PM₁₀
- Hounslow AQMA declared in 2006 for Nitrogen dioxide NO₂
- Hillingdon AQMA declared in 2003 for Nitrogen dioxide NO₂
- Richmond upon Thames AQMA declared in 2000 for Nitrogen dioxide NO₂ and Particulate Matter PM₁₀

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.

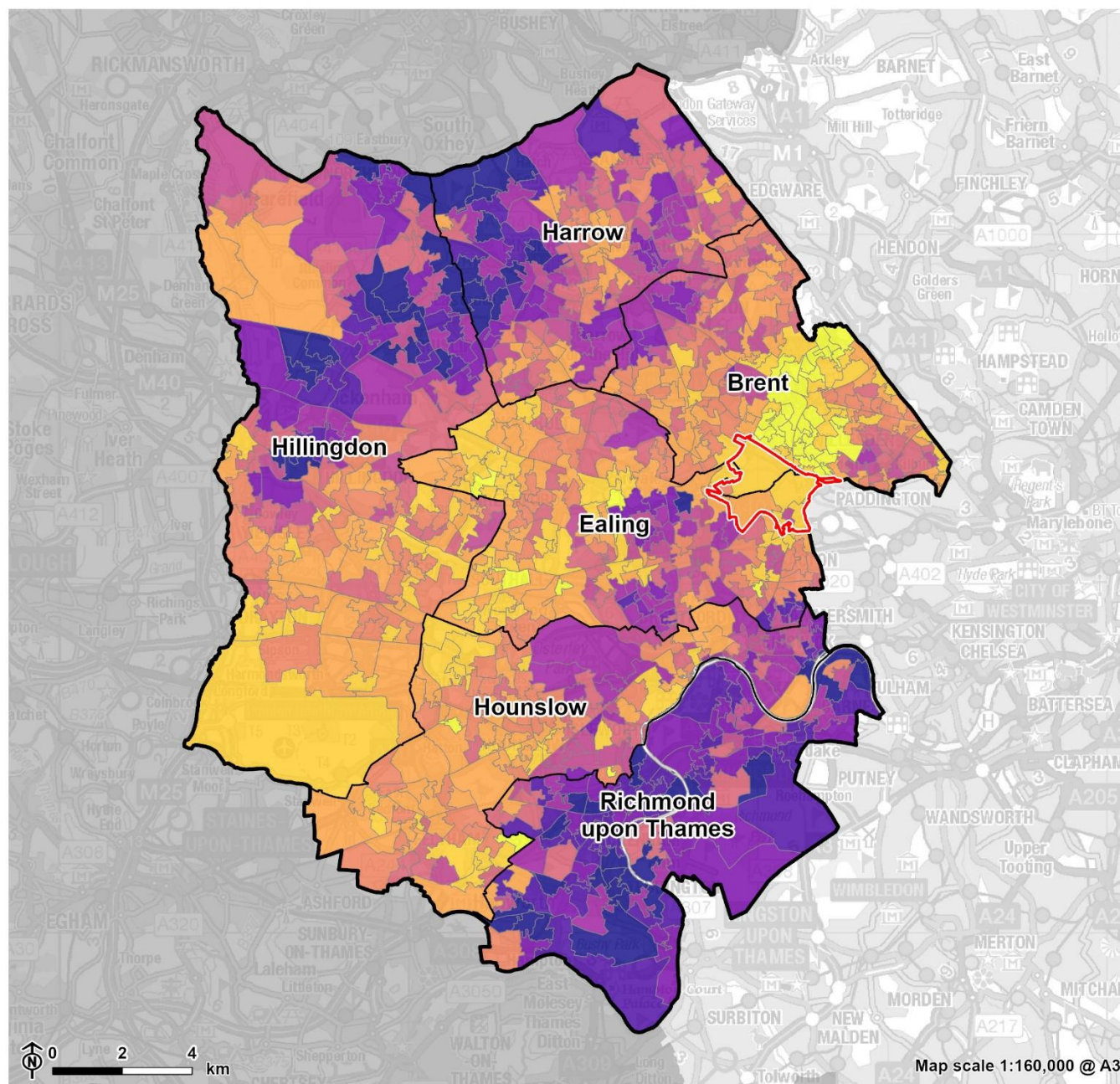


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Figure C.1: Flood Risk

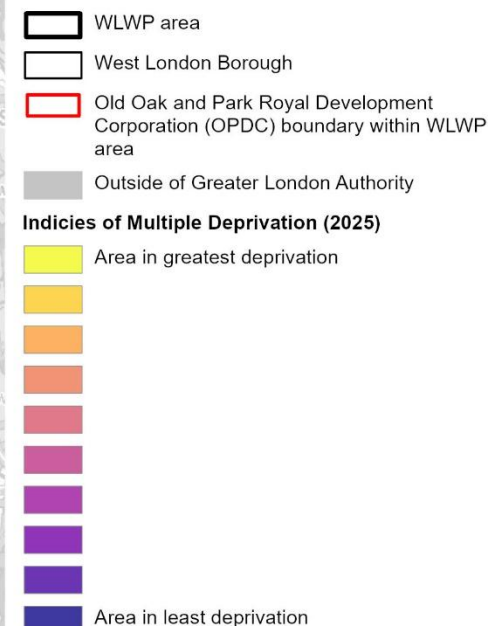
- WLWP area
- West London Borough
- Old Oak and Park Royal Development Corporation (OPDC) boundary within WLWP area
- Outside of Greater London Authority
- Flood Map for Planning**
- Flood Zone 2
- Flood Zone 3



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Figure C.2: Indices of Deprivation



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Data produced by Ministry of Housing, Communities and Local Government (MHCLG). Boundaries used for data provided by Office of National Statistics (ONS).

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Map scale 1:160,000 @ A3

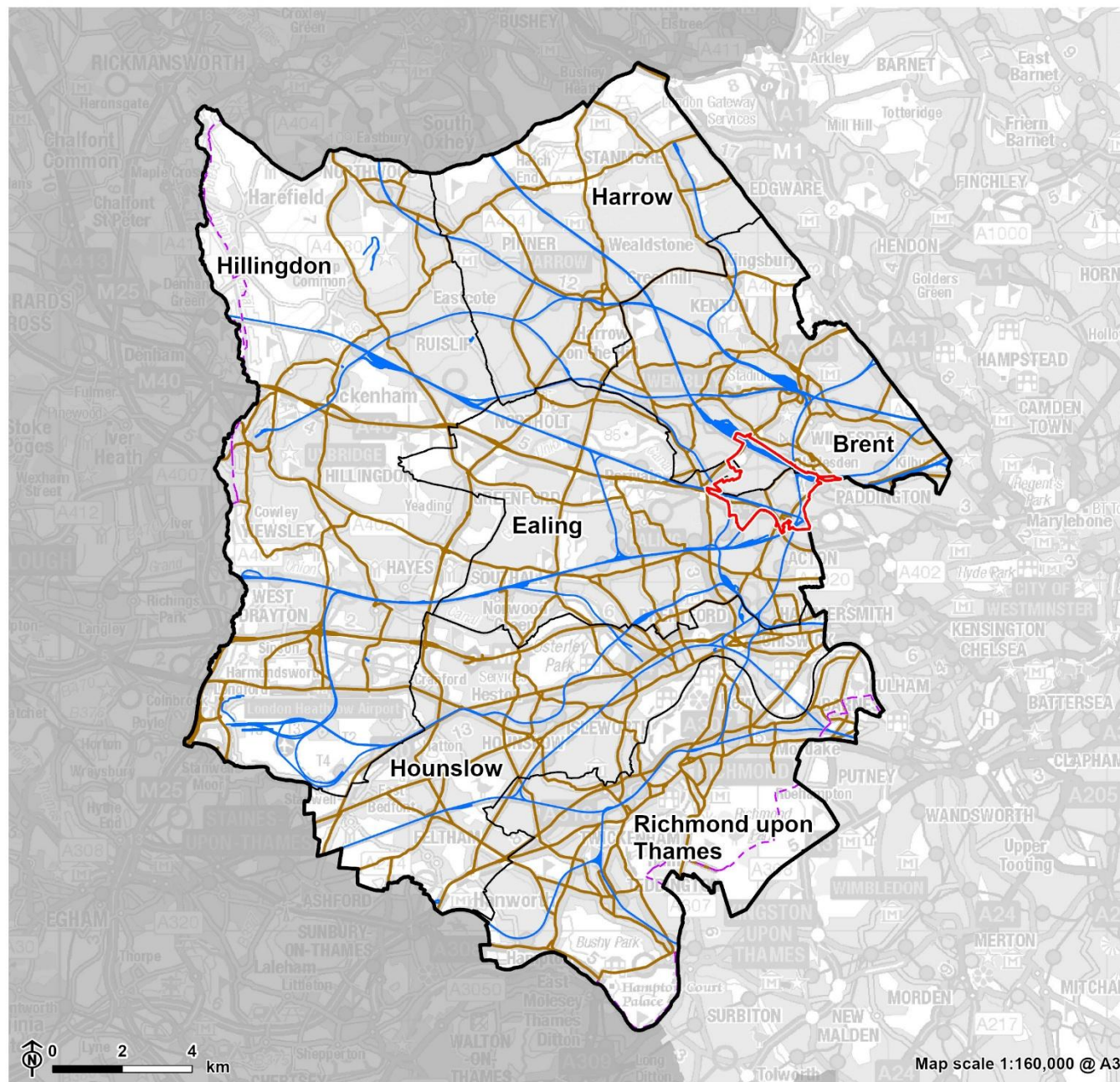
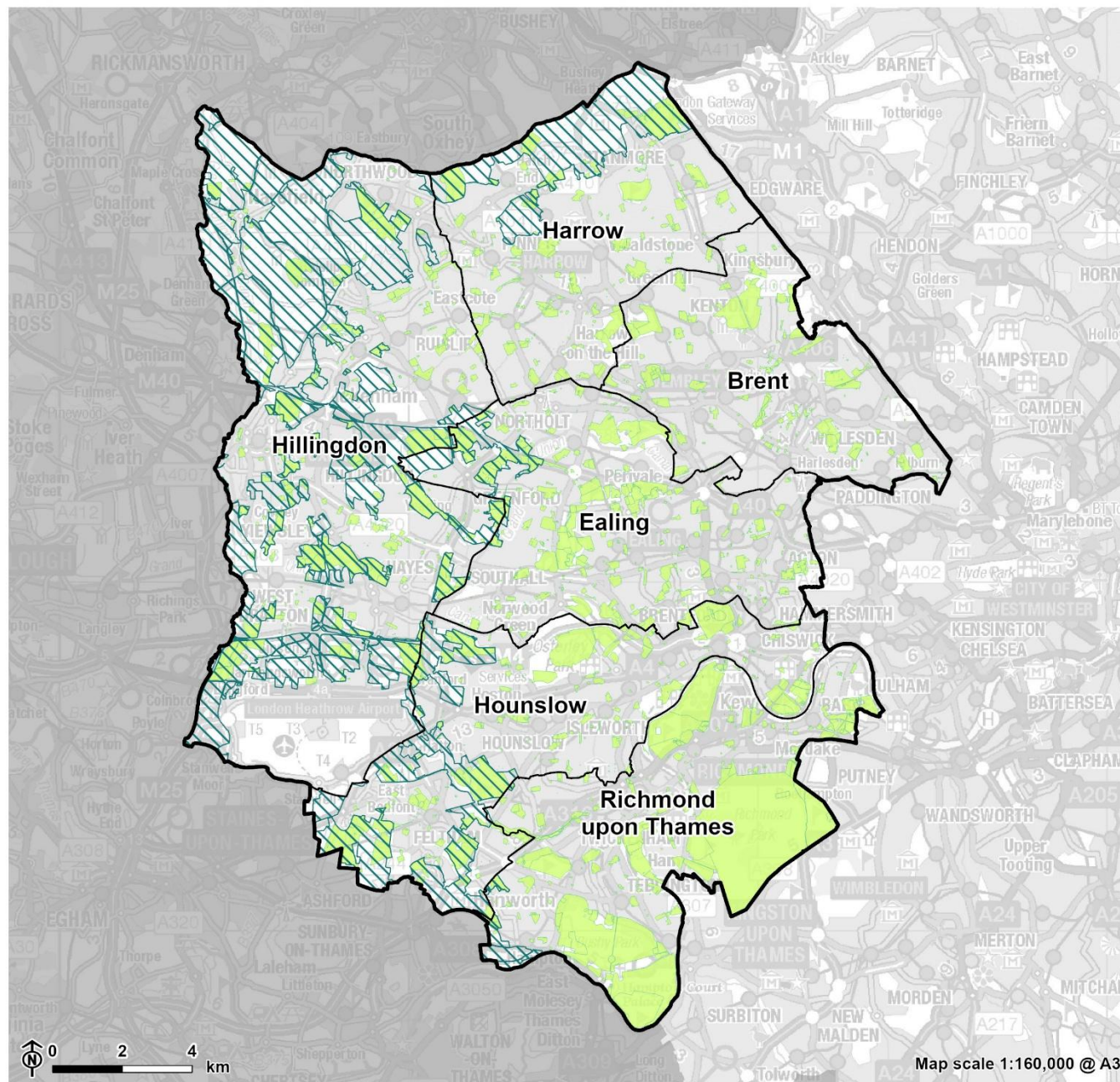


Figure C.3: Transport Network

- 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



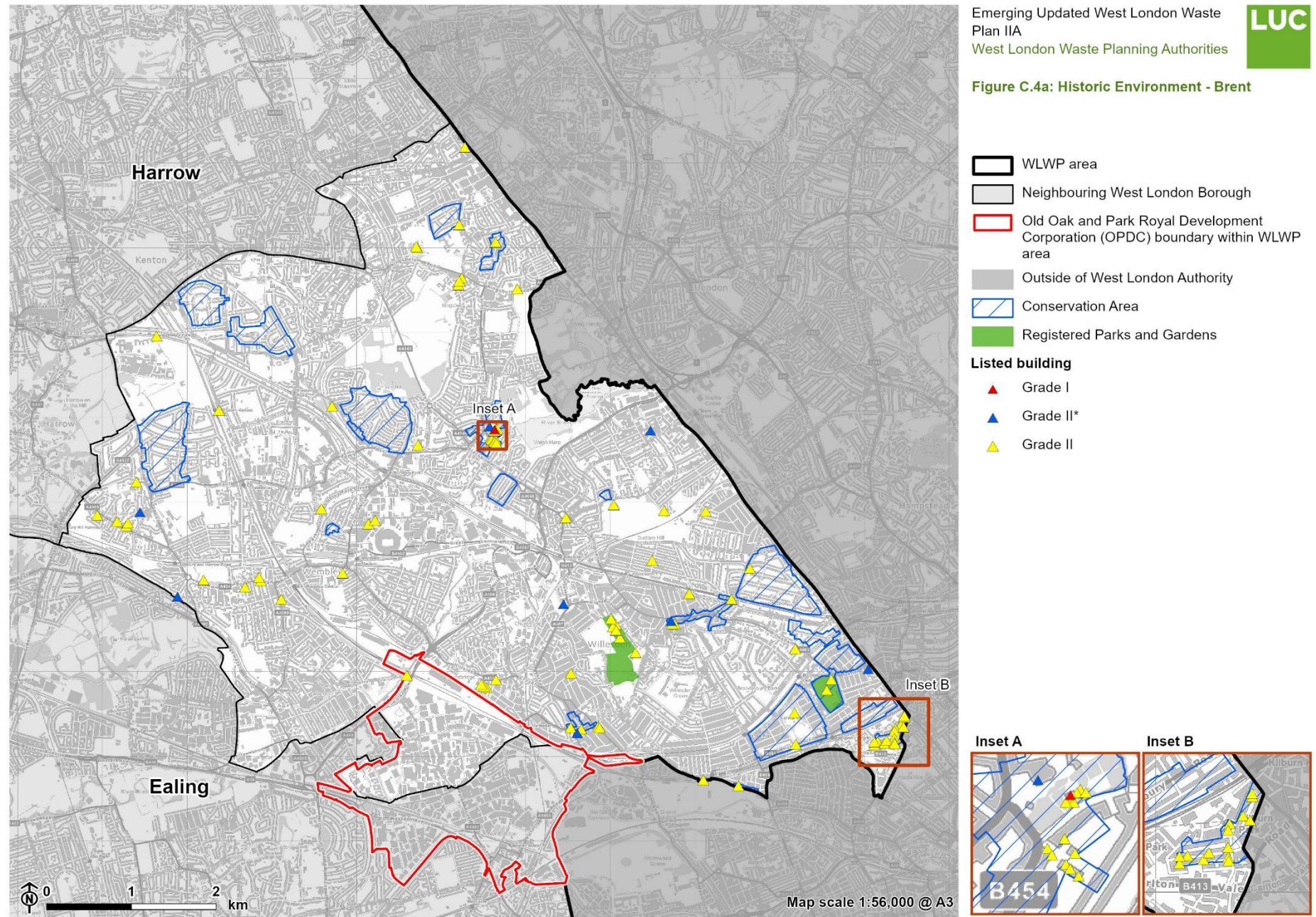
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Figure C.4: Open Space

- WLWP area
- West London Borough
- Outside of Greater London Authority
- Open Space**
 - Green Belt
 - Greenspace

Figure C.4a: Historic Environment - Brent



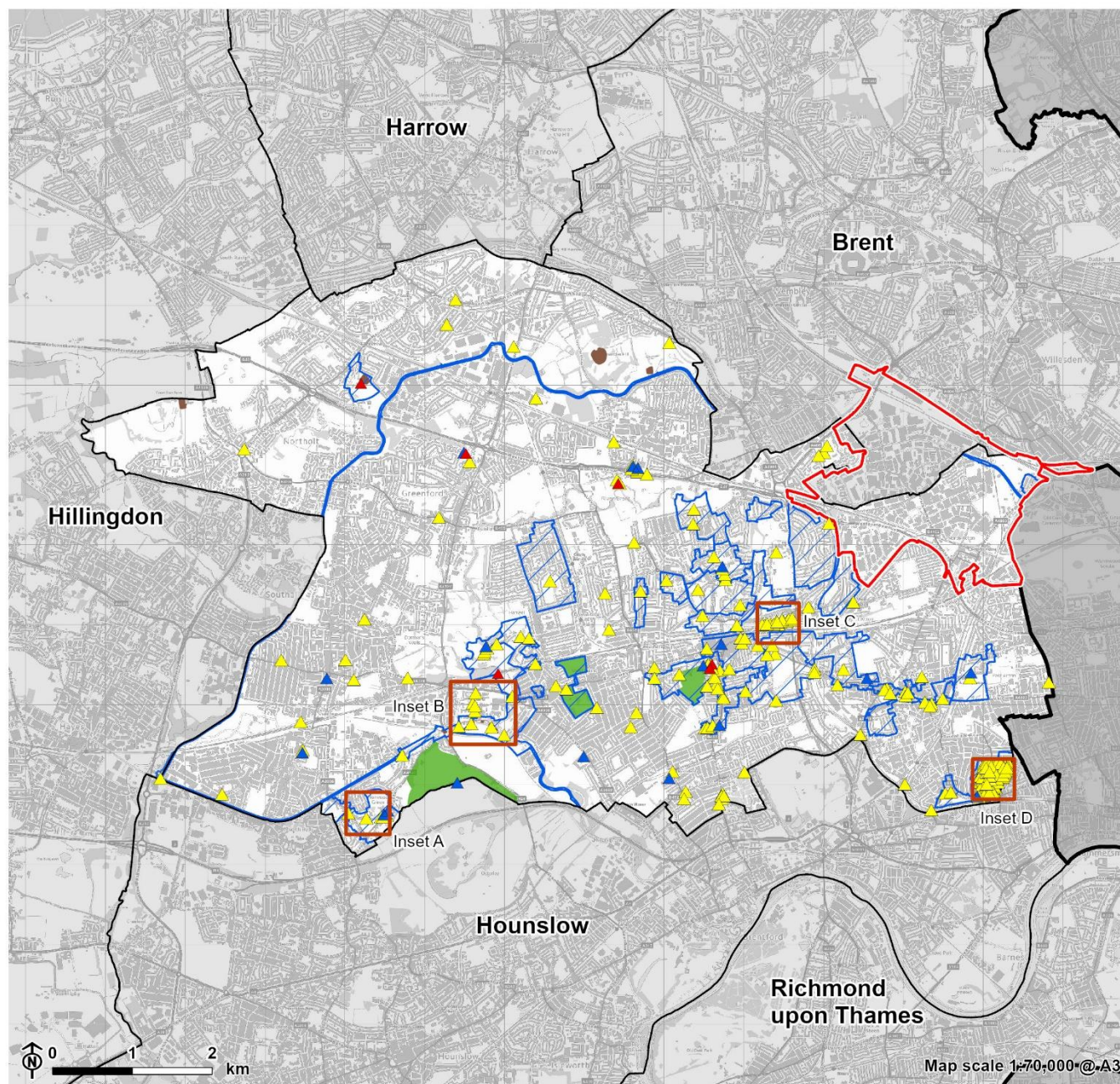
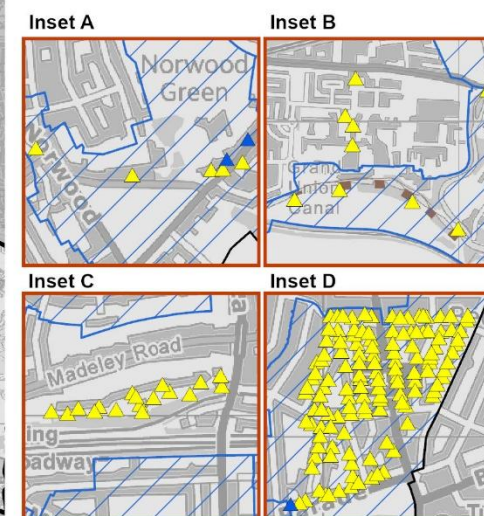


Figure C.4b: Historic Environment - Ealing

- WLWP area
- Neighbouring West London Borough
- Old Oak and Park Royal Development Corporation (OPDC) boundary within WLWP area
- Outside of West London Authority
- Conservation Area
- Scheduled Monument
- Registered Parks and Gardens
- Listed building**
 - Grade I
 - Grade II*
 - Grade II



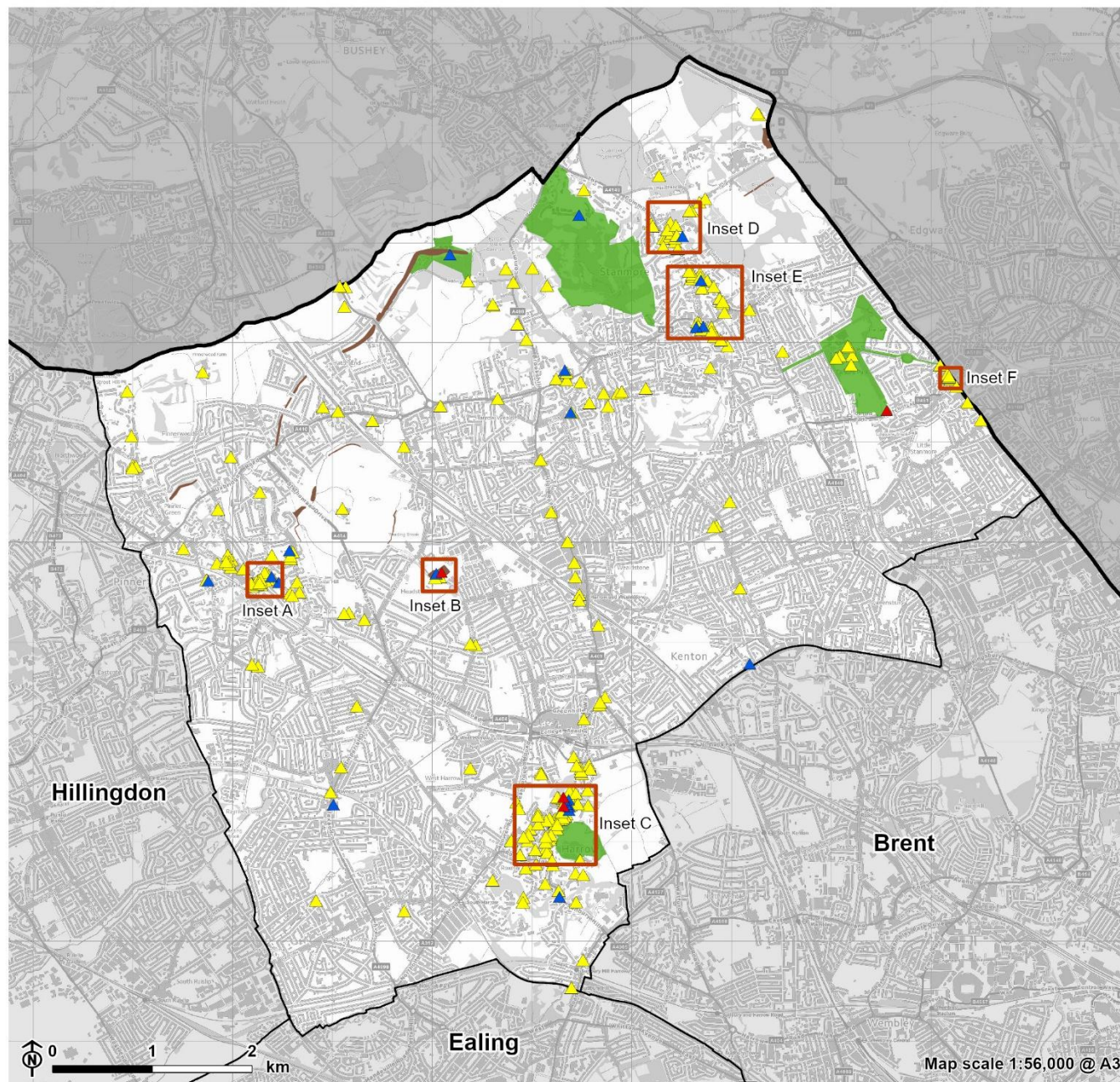
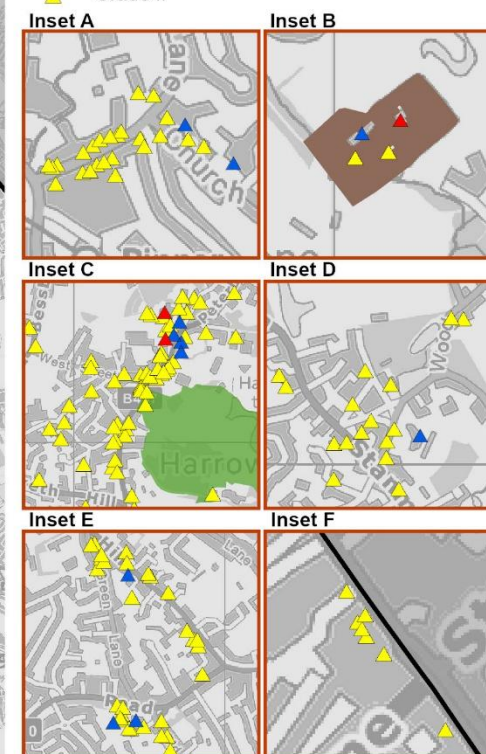


Figure C.4c: Historic Environment - Harrow

- WLWP area
- Neighbouring West London Borough
- Outside of West London Authority
- Scheduled Monument
- Registered Parks and Gardens

Listed building

- ▲ Grade I
- ▲ Grade II*
- ▲ Grade II



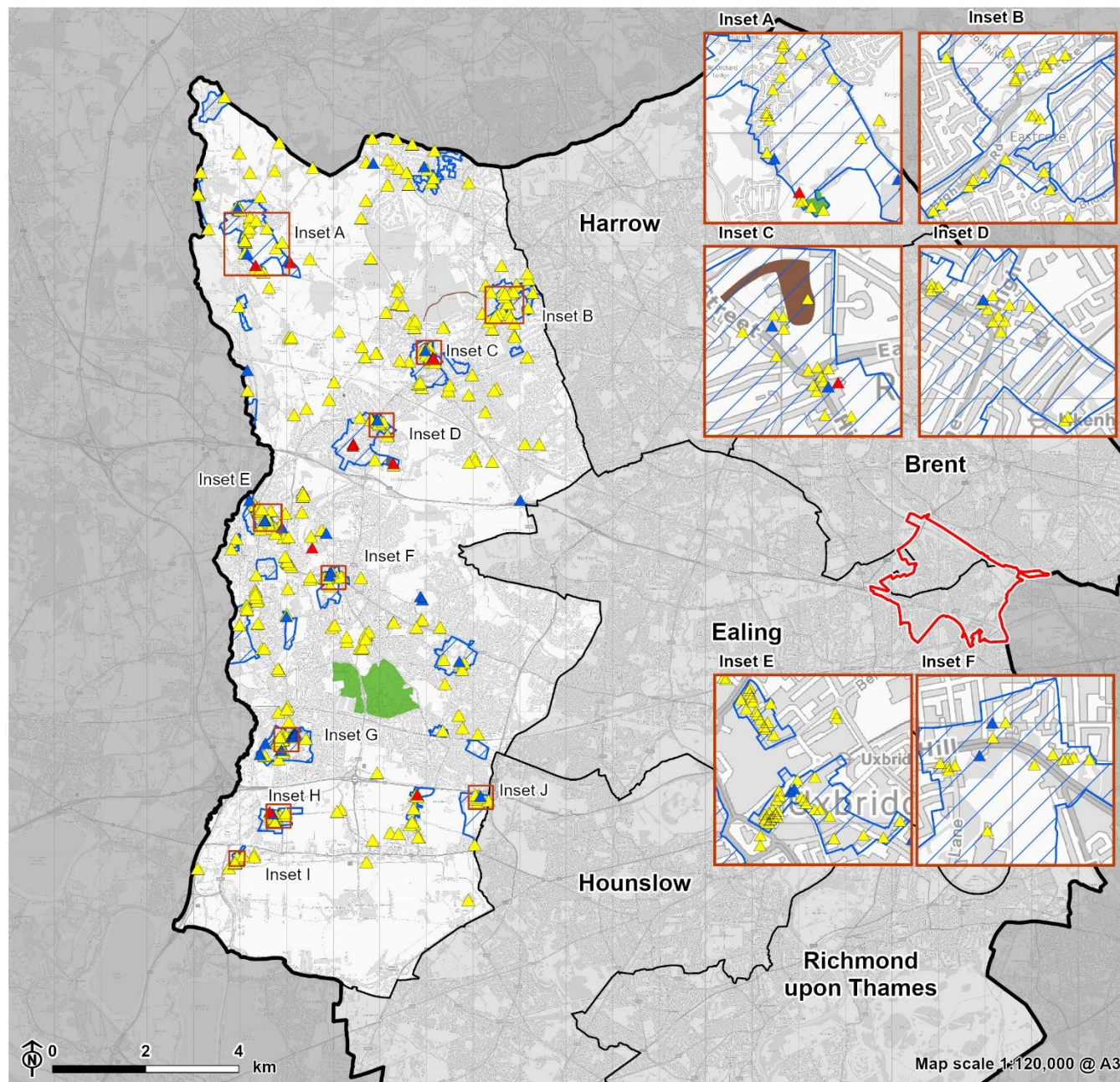
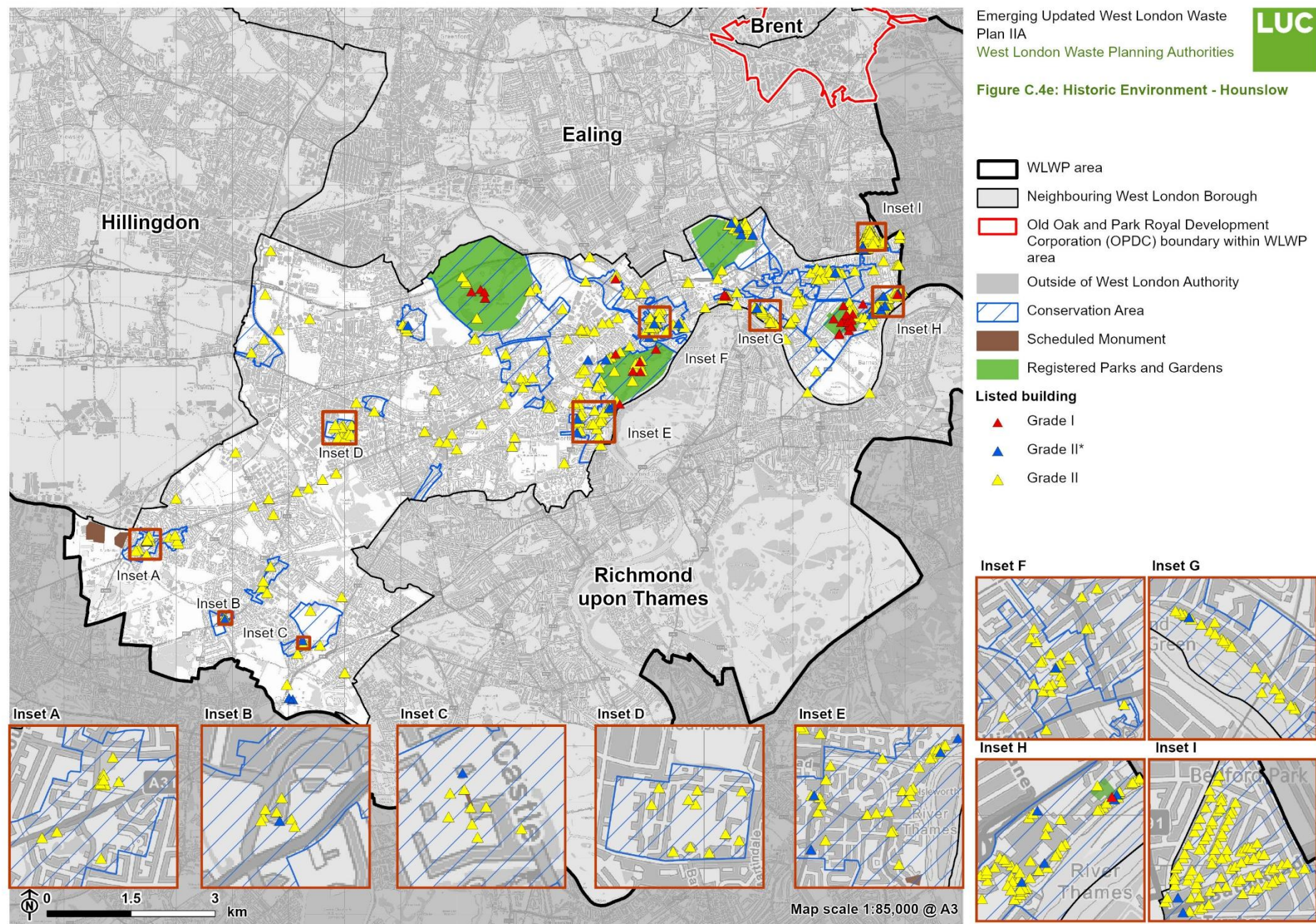
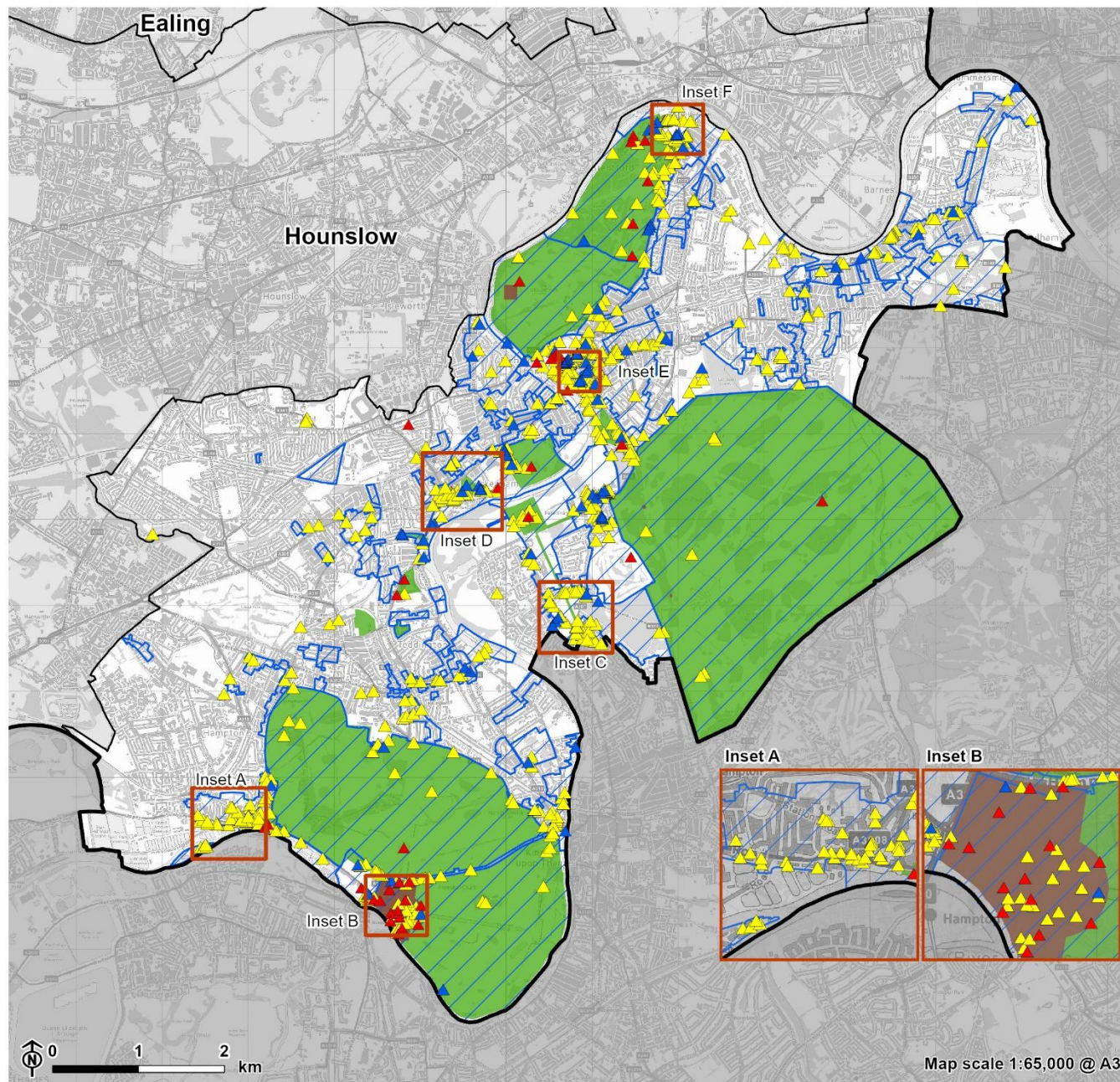


Figure C.4d: Historic Environment - Hillingdon

- WLWP area
 - Neighbouring West London Borough
 - Old Oak and Park Royal Development Corporation (OPDC) boundary within WLWP area
 - Outside of West London Authority
 - Conservation Area
 - Scheduled Monument
 - Registered Parks and Gardens
- Listed building**
- ▲ Grade I
 - ▲ Grade II*
 - ▲ Grade II







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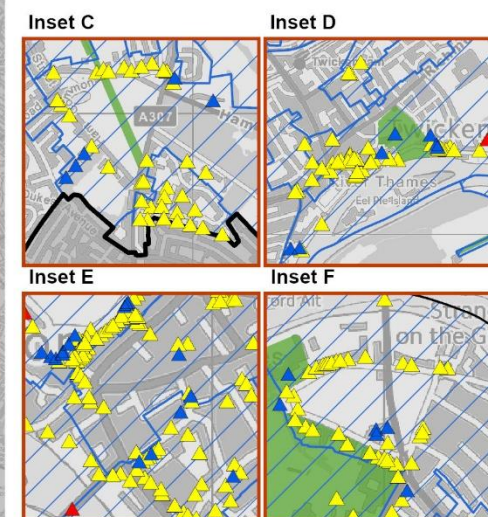


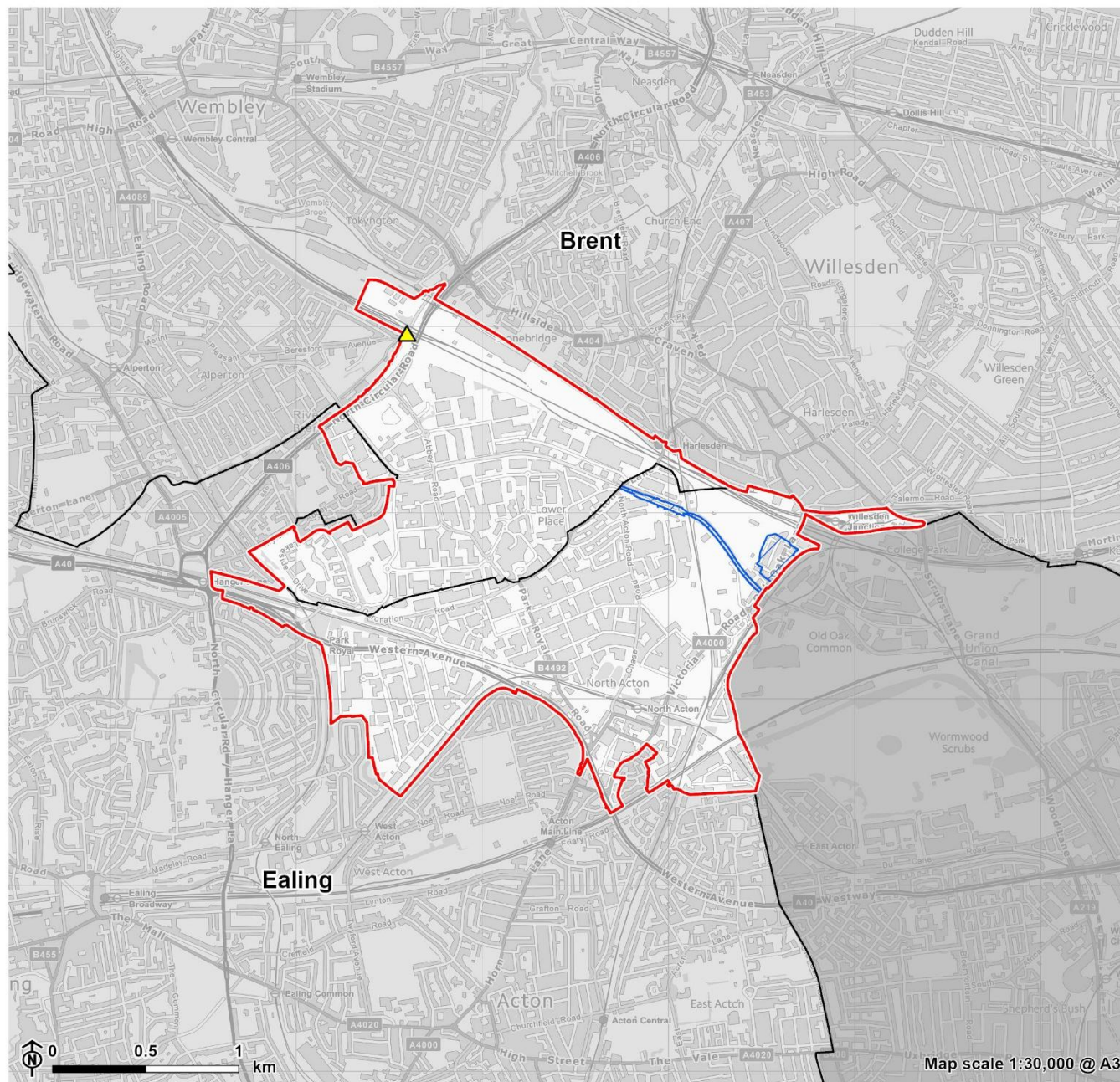
Figure C.4f: Historic Environment - Richmond upon Thames

- WLWP area
- Neighbouring West London Borough
- Outside of West London Authority
- Conservation Area
- Scheduled Monument
- Registered Parks and Gardens

Listed building

- Grade I
- Grade II*
- Grade II





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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

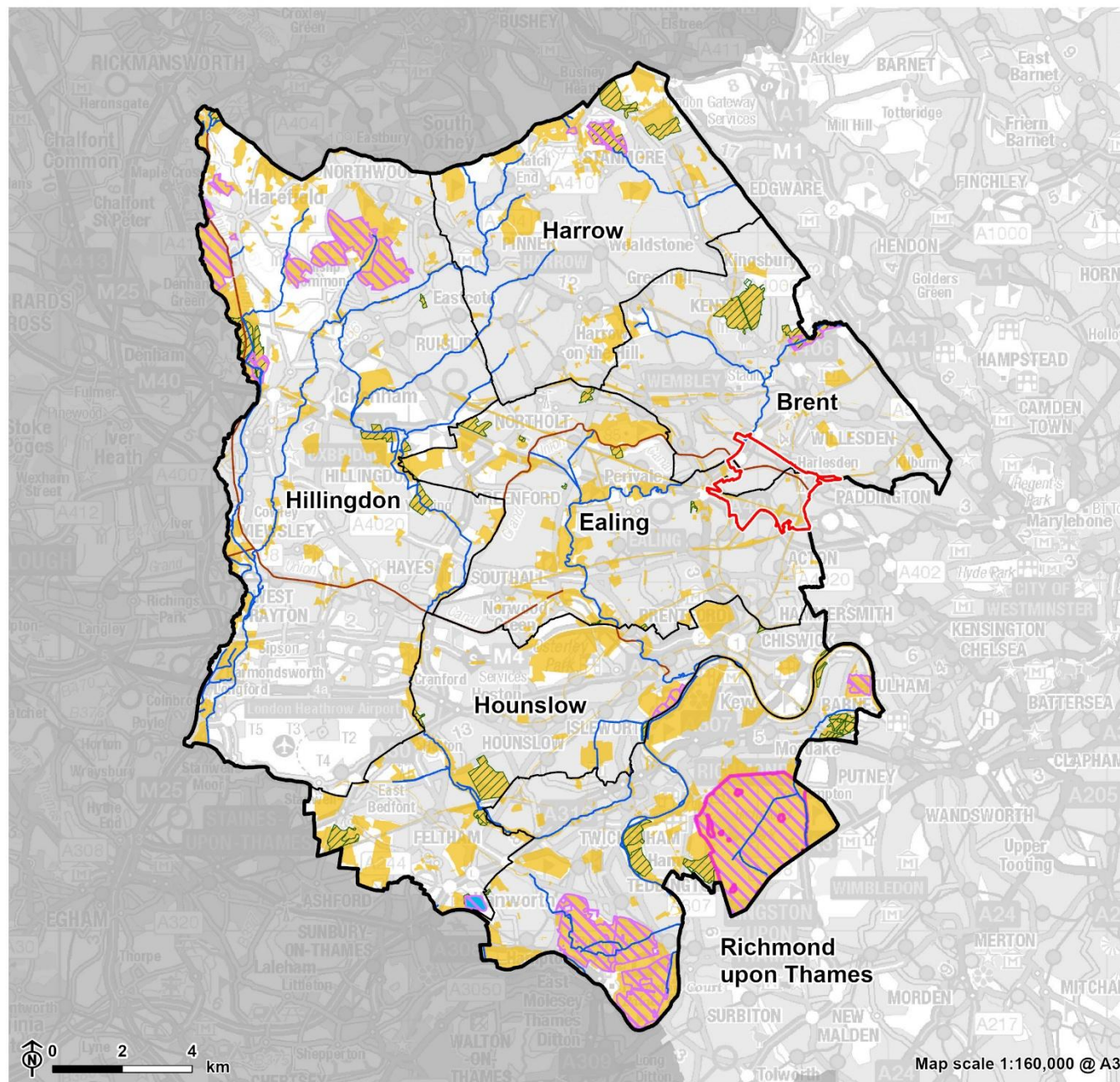


Figure C.5: Biodiversity

- 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

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:	

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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	

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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 “*suitability 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.

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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?	++	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.
Will it manage waste as close to source as possible?	+	Potential site options which are adjacent to an existing rail depot or wharf are considered to have a positive effect on this objective.	
Will it support an overall reduction in the distance travelled by waste, either within the WLWP area or across the wider London area?	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?	++	N/A	GIS data from Natural England and Waste Planning Authorities
	+	N/A	
Will it protect and enhance habitats of international, national, regional or local importance?	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.	
Will it protect and improve local populations of terrestrial species that are of international, national, regional or locally importance?	-?	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.	
Will it avoid harm, protect, and improve local populations of aquatic and wetland species that are of international, national,	--?	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	
	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.	
Will it protect and enhance the quality of watercourses and water bodies?			

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 (AQMA) 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 Annex 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	

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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 uncertainty, 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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