

# **Integrated Impact Assessment for the West London Waste Plan**

Regulation 18 Consultation

## **West London Waste Planning Authorities**

**Final report**

Prepared by LUC

October 2025

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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 emerging West London Waste Plan (WLWP).

**1.2** Production of the emerging 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 18 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 18 of the emerging WLWP.

**1.4** 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

**1.5** The emerging 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.

**1.6** 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 emerging 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.

**1.7** 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.

**1.8** 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 [\[See reference 2\]](#).

**1.9** 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)

**1.10** 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.

**1.11** 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.

**1.12** 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.

**1.13** 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, Stockley Park, 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.
- 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.

**1.14** 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.

**1.15** 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 3 permitted waste management facilities operational within the Borough.

- 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.

**1.16** 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.

**1.17** Due to the location of the plan area, the emerging 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

**1.18** 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).

**1.19** 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.

**1.20** 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.

**1.21** 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

**1.22** 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 emerging WLWP to be subject to SA and SEA throughout its preparation.

**1.23** 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 emerging 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’.

**1.24** The SA process comprises a number of stages, which are being undertaken as part of the IIA, with scoping being Stage A as shown below:

**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

**1.25** 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 emerging 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

**1.26** 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.

**1.27** In fulfilling this duty, many authorities still find it useful to produce a written record of how equality issues have been considered. In this IIA report, equalities issues are considered within the appraisal framework (set out in Chapter 3).

## Habitats Regulations Assessment

**1.28** 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.

**1.29** 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.

**1.30** 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

**1.31** 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 emerging 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.

**1.32** 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 [\[See reference 18\]](#).

**1.33** 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

**1.34** 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.

**1.35** 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

**1.36** 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 **Chapter 5** 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 **Chapter 5** 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.
  - To be addressed in the Regulation 19 IIA Report.
- j) A non-technical summary of the information provided under the above headings.
  - A separate non-technical summary document will be prepared to accompany the 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 have been addressed in this IIA Report are presented 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).
  - Public consultation is being undertaken on the Regulation 18 WLWP commencing end 2025. The Regulation 18 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)

**1.37** 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 will be set out in the next iteration of the IIA Report at Regulation 19 stage. The final suggested monitoring indicators will be included in the SEA post-adoption statement.

## Quality assurance

- Environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.
  - This Scoping 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

**1.38** This chapter describes the background to the production of the emerging West London Waste Plan 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 emerging WLWP.
- **Chapter 3** describes the relationship between the West London Waste Plan 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 WLWP.
- **Chapter 4** presents the IIA findings for the options considered for inclusion as policies in the emerging WLWP.
- **Chapter 5** presents the IIA findings, including the EqIA and HIA for the various elements of the emerging WLWP, including the vision, objectives and policies.
- **Chapter 6** describes how the current IIA report meets the SEA Regulations reporting requirements, what will be needed for monitoring the significant effects of the emerging WLWP, summarises the key conclusions and next steps to be undertaken in the IIA of the emerging 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 completed to date (Scoping) and explains how they have been addressed.
- **Appendix C** presents baseline sustainability information for the plan area.

## 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 was taken to the IIA of the emerging 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 emerging 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 emerging WLWP to understand the likely future sustainability conditions in the absence of the emerging 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 emerging 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 emerging 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 Appendix B** lists the comments that were received on the IIA during the consultation on the Scoping Report. The Appendix describes how each comment was addressed. In light of the comments received, 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 B. 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 have therefore been added into the IIA framework (see Chapter 3).

## 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 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. The emerging WLWP does not allocate new waste sites because the evidence suggests that there is a sufficient waste management capacity within existing waste sites. Therefore, site options for new waste site allocations were not considered, however, options relating to whether to identify new site allocations or rely on safeguarding existing waste sites were.

**2.22** Further explanation of the 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

**2.23** The draft vision, strategic objectives and policies in the Regulation 18 WLWP were appraised against the IIA objectives in the IIA framework and the findings are presented in **Chapter 5**. The reasonable alternative policy approaches are appraised in **Chapter 4**.

## **Making recommendations for the Plan**

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

**2.25** 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**

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

**2.27** This IIA report is intended to meet all the reporting requirements of Schedule 1 of the SEA Regulations.

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

**2.28** The seven waste planning authorities are inviting comments on the emerging WLWP (Regulation 18 draft) and this accompanying IIA Report. These documents will be published on the West London Waste Plan website for consultation end 2025.

## SA Stage E: Monitoring implementation of the Local Plan

**2.29** Recommendations for monitoring the likely significant social, environmental and economic effects of implementing the emerging WLWP will be presented in the next iteration of the IIA, once the policies are closer to being finalised.

### IIA framework

**2.30** 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 IIA of the emerging 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.

**2.31** 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 and the SEA Topics, Equality Act 2010 protected characteristics is set out within **Chapter 3**.

### Key to IIA effects symbols

**2.32** 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

Symbol	Effect
-	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

**2.33** 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.

**2.34** 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.

**2.35** 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.

**2.36** The likely sustainability effects of the emerging WLWP and its reasonable alternatives are summarised in **Chapter 5**. Potential cumulative impacts will be set out in the next iteration of the WLWP when the policies are closer to being finalised.

## Difficulties and data limitations

**2.37** 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.”

**2.38** of 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 development are dependent on the exact location, layout and design of development, so it may be possible to mitigate some of the effects highlighted in this IIA. However, given the inherent uncertainties about these details, 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.
- 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. 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 emerging 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 in 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 emerging 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** As of the end of January 2020 the UK has left the EU. Principally, the UK's environmental law is derived from EU law or was directly effective EU law. As a result of Brexit, the European Union (Withdrawal) Act 2018 converts existing EU law which applied directly in the UK's legal system (such as EU Regulations and EU Decisions) into UK law and preserves laws made in the UK to implement EU obligations (e.g., the laws which implement EU Directive). This body of law is known as retained EU law and is could be subject to future, post-Brexit amendments.

**3.5** 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.

**3.6** No substantive changes have been made to the UK regulations to date; however, the Government does intend to reform the planning system, including replacing SEA and SA with a new requirement for an Environmental Outcomes Report. No further information is known at the time of writing. Any changes to the legal framework for carrying out SA/SEA will be addressed as appropriate as the emerging WLWP is prepared.

## International plans, policies and programmes

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

**3.8** 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 emerging 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.

**3.9** 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.

**3.10** 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.

**3.11** Furthermore, the 2030 Agenda for Sustainable Development (2015) [\[See reference 22\]](#). 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

**3.12** The National Planning Policy Framework (NPPF) [\[See reference 23\]](#) is the overarching planning framework which provides national planning policy and principles for the planning system in England. The emerging WLWP must be

consistent with the requirements of the NPPF which sets out information about the purposes of local plan-making. It states:

**3.13** “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”.

**3.14** The NPPF does not contain specific waste policies. The detailed waste planning policies are contained in the National Planning Policy for Waste (2014) [\[See reference 24\]](#). 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.

**3.15** The NPPF is supported by Planning Practice Guidance which includes guidance on Waste (2015) [\[See reference 25\]](#). 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.

**3.16** Also of particular relevance to the emerging 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.

**3.17** Error! Reference source not found. lists the national plans and programmes that are of greatest relevance to the emerging 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 emerging WLWP. This list will be updated at each stage of the IIA, where appropriate.

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

<b>National Legislation</b>
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
<b>National Regulations</b>
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

<b>National Legislation</b>
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
<b>National Policies, Plans and Strategies</b>
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
Environment Agency (2020) National Flood and Coastal Erosion Risk Management Strategy for England Policy Paper
Environment Agency (2022) Flood risk assessments: climate change allowances – National Guidance
DEFRA (2011) Future water: The Government's Water Strategy for England Policy Paper
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

<b>National Legislation</b>
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
Our Waste, Our Resources: A strategy for England (2018)
British Energy Security Strategy (2022)
DEFRA (GP3): Underground, Under threat – Groundwater Protection: Policy and Practice
DLHC (2022) Flood risk and coastal change guidance
Environment Agency (2022) National Flood and Coastal Erosion Risk Management Strategy for England
DEFRA (2008) Future Water: The Government's Water Strategy for England

<b>National Legislation</b>
Environment Agency (2009) Water for People and the Environment: Water Resources Strategy for England and Wales
MHCLG (2019) Clean Air Strategy
DECC (2014) Community Energy Strategy
Environment Agency (2025) National Framework for Water Resources
DEFRA (2023) Biodiversity Net Gain
Environment Agency (2022) Thames River Basin District River Basin Management Plan: updated 2022
<b>Government policy papers</b>
DEFRA (2021) The Water White Paper
25 Year Environment Plan (2018)
Resources and Waste Strategy for England (2018)

**3.18** The emerging WLWP is not being prepared in isolation but is influenced by, and influences, other policies, plans and programmes. The emerging 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.

**3.19** 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”

**3.20** 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 emerging WLWP. The review is not exhaustive, and an exhaustive approach would not be proportionate or be useful in understanding the policy environment that the emerging 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 emerging WLWP should and should not do. It should be noted that the policy context within which the emerging WLWP and its IIA are being prepared is inherently uncertain given the following key factors:

**3.21 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 [\[See reference 26\]](#). 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%.

**3.22 ‘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.

**3.23 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 Bill is seeking 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 by proposing that a delivery body (like Natural England) produces ‘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

**3.24** It is not a requirement of the SEA Regulations to describe the relevance of policy objectives established at sub-national scale for the emerging WLWP. However, since they provide further context for the emerging 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**

<b>Key Greater London Authority (GLA) policies, strategies and guidance</b>
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)

**3.25** 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 emerging WLWP must follow, the emerging 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 emerging 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 emerging 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**

<b>Key Local plans, programmes and policies</b>
<b>West London wide</b>
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)
<b>London Borough of Brent</b>
Brent Local Plan 2019-2041 (2022)
Local Development Scheme (2025)
Brent Authority Monitoring Report 2021/22 & 2022/23 (2024)
Air Quality Action Plan (2023)
Sustainable Environment and Development SPD (2023)
Air quality monitoring and reports (2019 – 2023)
Neasden Stations Growth Area and Supplementary Planning Document (2022)
Brent Climate & Ecological Emergency Strategy 2012- 2030 (2021)
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)

<b>Key Local plans, programmes and policies</b>
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)
<b>London Borough of Ealing</b>
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)
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)
<b>London Borough of Harrow</b>
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

<b>Key Local plans, programmes and policies</b>
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)
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)
<b>London Borough of Hillingdon</b>
Local Development Scheme (2025)
Hillingdon Local Plan Part 2: Site Allocations and Designations (2020)
Hillingdon Local Plan Part 2: Development Management Policies (2020)
Authority Monitoring Report (2019)
Hillingdon Third Local Implementation Plan 2019–2041 (2019)
Development Infrastructure Study (DIFS) (2017)
London Borough of Hillingdon Strategic Infrastructure Plan (SIP) (2017)
<b>London Borough of Hounslow</b>
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)
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)

<b>Key Local plans, programmes and policies</b>
Recycling and Refuse Guidance (2022)
Climate Emergency Action Plan (2020)
Planning obligations and CIL SPD (2015)
Air Quality SPD (2008)
<b>London Borough of Richmond upon Thames</b>
Richmond Local Plan Publication (Regulation 19) Consultation Version (2023) – following examination due to be adopted October 2025
Infrastructure Delivery Plan Addendum (2024)
Local Development Scheme (2025)
Local Plan Infrastructure Delivery Plan (2023)
Richmond upon Thames Reduction and Recycling Plan (2025)
Net Zero Carbon Study (2023)
Employment Land and Premises Needs Assessment (2021)
Strategic Flood Risk Assessment – Level 1 Update (2021)
Air Quality SPD (2020)
Sustainable Construction Checklist Guidance Document (2020)
Planning Obligations SPD (2020)
Transport SPD (2020)
Climate Emergency and Nature Strategy (2025)
Development Control for Noise Generating and Noise Sensitive Development (2018)
Richmond Preliminary Flood Risk Assessment (2011)
<b>Old Oak and Royal Park Development Corporation</b>
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)

Key Local plans, programmes and policies
Industrial Land Review (2015) and Addendum (2021)
Infrastructure Delivery Plan (2021)
OPDC Landscape Strategy (2020)
Integrated Water Management Strategy (2018)
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

**3.26** 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.

**3.27** It is also a requirement of the SEA Directive that consideration is given to the likely evolution of the environment in the plan area (in this case the emerging 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.

**3.28** 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 emerging WLWP. The effectiveness of the emerging 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

**3.29** The emerging updated 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 transport. Without the emerging WLWP, these opportunities could be missed.

## Climate change adaptation and mitigation

**3.30** There is a need to significantly reduce greenhouse gas emissions to help meet international and national greenhouse gas reduction targets. The emerging 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.

**3.31** The effects of climate change in the emerging 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 emerging 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, 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

**3.32** Across the emerging WLWP authorities, population is forecast to increase, with younger (0 to 15) and older (over 65) 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 emerging WLWP will provide opportunities to ensure that the existing network of waste management facilities can keep pace with demand for waste management services.

**3.33** 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 emerging 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 emerging 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 [\[See reference 27\]](#).

**3.34** Levels of deprivation and percentages of different population groups subject to the Equalities Act are influenced by many variables and are unlikely to change with or without the emerging WLWP, although 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 over time but there are uncertainties if current trends will continue over time.

## Economy

**3.35** 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.

**3.36** The emerging 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

**3.37** Adverse traffic conditions on key highway routes within the emerging 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.

**3.38** Although the traffic movements associated with waste development may be smaller than other activities, without the emerging 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.

**3.39** The emerging 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

**3.40** There are many designated and undesignated heritage assets and areas of historical and cultural interest in the emerging 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 emerging WLWP it is possible that these, and undesignated assets, will be adversely affected by inappropriate waste development. The emerging WLWP provides an opportunity to protect these assets (including their settings) from inappropriate waste development, through criteria in its policies.

**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.



## Landscape and townscape

**3.42** 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 emerging 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

**3.43** The emerging 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 (SINCs) among local green spaces and networks that provide ecological connectivity and greater biodiversity, and there is proximity to sites of national importance.

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

**3.45** Without the emerging WLWP, important habitats and biodiversity sites will continue to receive statutory protection. However, the emerging WLWP presents an opportunity to manage the sensitivities of the sites and biodiversity networks, for example by providing for biodiversity net-gain in any new or redeveloped waste management site.

## Air, land and water quality

**3.46** Without the emerging 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 emerging WLWP, the NPPF would apply, which also supports the reuse of brownfield land.

**3.47** Without the emerging 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 emerging 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.

**3.48** Air pollution associated with parts of London's road network has exceeded statutory NO<sub>2</sub> levels and needs active monitoring and management. In the absence of the emerging WLWP, the policies in the NPPF and the Clean Air Strategy [See reference 28] 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.

**3.49** 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 emerging 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

**3.50** 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 emerging 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.

**3.51** A small number of changes have been made to some of the appraisal questions in the IIA framework since it was presented in the Scoping Report, in response to comments received during the Scoping consultation – these changes are detailed 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 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 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 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 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 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 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 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 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 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 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 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 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

# IIA of reasonable alternatives considered for the emerging WLWP

**4.1** This chapter provides an outline of the policy approaches considered for the WLWP and the IIA findings for those identified as reasonable alternatives to the proposed policies in the emerging WLWP.

## Issues and Options for emerging WLWP

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

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

**4.4** The options are not mutually exclusive, and some of the options have been combined and addressed in one policy, or addressed in elements of more than one policy. Where an option is addressed in one or more of the draft policy, the relevant WLWP policy/ies is identified. Deliverable approaches not taken forward in the draft policies have been considered as "reasonable alternatives" and assessed in this chapter.

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

- **Issue 1a:** Finite land supply and competing development pressures threaten the retention of West London's existing waste management capacity.

- Option 1: No new site allocations – rely on safeguarding existing waste sites (protect existing waste sites and Strategic Industrial Locations from redevelopment). This is the approach in **Policy WLWP1**.
- Option 2: No new site allocations – rely on safeguarding and intensification of existing waste sites (as per adopted WLWP) and other suitable sites where criteria are met. This is the approach in **Policy WLWP2**.
- Option 3: Identify Areas of Search or site allocations for waste use – e.g. search within SIL or LSISs or underutilised and previously-developed land. Not addressed in WLWP. **This is a reasonable alternative to Policy WLWP1 and WLWP2.**
- **Issue 1b:** Not all waste generated in West London is currently managed within the sub-region, risking dependence on out-of-Plan area facilities.
  - Option 1: Maximise Plan area capacity to manage all waste streams – support development of facilities to handle wastes currently exported (e.g. residual waste treatment, construction waste recycling) in accordance with the principle of “net self-sufficiency” and the proximity principle. This approach is addressed in elements of **Policy WLWP1, WLWP2, WLWP3 and WLWP5**.
  - Option 2: Continue to utilise facilities outside Plan area for management of residual waste – providing it can be shown to be the most sustainable option (for instance, if a high efficiency Energy from Waste plant outside West London has capacity and can process residual waste with full energy recovery, carbon capture, using low carbon transport). Not addressed in WLWP. **This is a reasonable alternative to elements of Policy WLWP1, WLWP2, WLWP3 and WLWP5.**
  - Option 3: Drive residual waste reduction to minimise exports – complement existing capacity retention and enhancement policies with ambitious waste reduction and recycling targets (see Strategic Objective 2 below), thereby reducing the amount of residual waste that would otherwise need management beyond the Plan area. This approach is partially addressed by elements of **Policy WLWP5 and WLWP6**, although it does not set targets. **Therefore, setting ambitious targets is a reasonable alternative to Policy WLWP5 and WLWP6.**
  - Option 4: Facilitate development of deposit of waste on land for residual waste within West London. This is the approach in **Policy WLWP3**.
- **Issue 1c:** Some existing waste sites in West London may be under-utilised and/or not equipped to handle waste in the most efficient, low-carbon manner.

- Option 1: Facilitate modernisation and upgrading of existing waste facilities – e.g. policy support for installing improved sorting technology, automation, carbon capture and/or electrified processing equipment, and enclosure of operations where appropriate. This approach is addressed by elements of **Policy WLWP1, WLWP2 and WLWP4**.
- Option 2: Co-locate waste facilities with complementary industries – Promote the integration of waste processing with other industrial or manufacturing uses (for instance, locating plastic recycling close to plastics production, or co-locating an energy-from-waste plant with an adjacent industry or district heating network that uses the heat/power). This approach is addressed by elements of **Policy WLWP1 and WLWP2**.

## Strategic Objective 2: Encourage Facilities that Contribute to the Achievement of a Circular Economy to come forward

- **Issue 2a:** Construction activities produce the majority of waste in West London, especially with large regeneration schemes – involving production of large amounts of waste if not designed out at the outset.
  - Option 1: Encourage beneficial use of excavation waste on-site or locally. This approach is addressed by elements of **Policy WLWP2, WLWP5 and WLWP6**.
  - Option 2: Support temporary recycling facilities on major construction sites or dedicated hubs for surplus construction materials. This is the approach in **Policy WLWP2**.
  - Option 3: Promote dedicated CD&E waste recycling facilities in West London – ensure policy supports provision of additional/enhanced capacity for conversion of suitable construction and demolition waste (concrete crushing, aggregate recycling, wood waste recovery, soil treatment) into products at appropriate locations. Safeguard existing sites processing CD&E waste and support their upgrade. This approach is addressed by elements of **Policy WLWP1 and WLWP2**.
- **Issue 2b.** Insufficient segregation of waste and limited capacity for certain recyclable streams are barriers to achieving a fully circular economy.
  - Option 1: Expand or adapt existing waste sites to handle a broader range of materials. This is the approach in **Policy WLWP2**.
  - Option 2: Facilitate development of specialist recycling or processing facilities. This approach is addressed by elements of **Policy WLWP2 and WLWP6**.

- Option 3: Enable development of new Circular Economy (CE) Hubs. This approach is addressed by elements of **Policy WLWP2**.

## Strategic Objective 3: Decarbonise Waste Transport and Processing

- **Issue 3a:** The majority of West London's waste is transported by road, contributing to traffic congestion and carbon emissions.
  - Option 1: Promote rail and water freight for waste movement. Safeguard existing railheads and wharves (e.g. at West Drayton, Brentford, on the Grand Union Canal and River Thames) that may be suitable for intermodal waste transfer. Include policy support/requirements for new or substantially redeveloped waste facilities to evaluate and, where feasible, utilise rail or barge transport for bulk waste. This approach is addressed by elements of **Policy WLWP1 and WLWP2**.
  - Option 2: Encourage consolidation of waste and routeing strategies to reduce road miles. This approach is addressed by elements of **Policy WLWP4**.
  - Option 3: Facilitate transition to low-emission vehicle fleets. While fleet management is not a land-use matter, planning conditions could require new waste facilities to provide electric vehicle charging infrastructure on-site (e.g. for future electric RCVs and service vehicles) and encourage use of non fossil fuel powered vehicles for waste transport. This approach is addressed by elements of **Policy WLWP4**.
- **Issue 3b:** Waste management facilities themselves can contribute to carbon emissions through energy use and, in some cases, direct emissions (e.g. combustion).
  - Option 1: Require low-carbon technology and energy efficiency in waste facilities. This approach is addressed by elements of **Policy WLWP4**.
  - Option 2: Integrate Energy from Waste (EfW) plants with other energy users. This approach is addressed by elements of **Policy WLWP3**.
  - Option 3: Decentralised and local energy solutions from waste. Support smaller-scale waste fuelled projects that would supply energy to communities or specific site. This approach is addressed by elements of **Policy WLWP3**.



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

- **Issue 4a:** Waste operations can negatively impact local environmental quality – causing odour, noise, dust, litter, light pollution and traffic – if not properly controlled. West London sites may be located in proximity to homes or sensitive areas.
  - Option 1: Include strict development management standards within policy for environmental control at waste sites. This approach is addressed by elements of **Policy WLWP4**.
  - Option 2: Implement buffer zones and sensitive site review. This approach is addressed by elements of **Policy WLWP1**.
  - Option 3: Establish whether any particularly poorly sited facilities need relocation (and if so plan for their relocation to less sensitive locations). **This is not considered to be a reasonable alternative** as the deliverability is unlikely, due to being aspirational and only deliverable if the operator is willing to relocate/exit the waste sector.
  - Option 4: Do not safeguard problematic facilities via emerging WLWP. This would involve excluding certain sites from the list of safeguarded existing waste sites to be included in the WLWP, allowing their redevelopment in due course. **This is not considered to be a reasonable alternative** as the deliverability is uncertain and it would not be in conformity with the current London Plan if the site falls within the London Plan's definition of an existing waste site. However, the London Plan (Policy SI9 and para 9.9.2) does allow for plan-led release of some existing waste sites, and this is discussed under the heading 'Safeguarding existing waste sites' below.
  - Option 5: Enforce route restrictions for waste related vehicle movements. This approach is addressed by elements of **Policy WLWP4**.
- **Issue 4b:** Climate change and flood risks pose a threat to existing waste infrastructure, and waste sites need to be resilient and environmentally positive (e.g. through biodiversity gains).
  - Option 1: Integrate flood resilience and climate adaptation into waste facility requirements. This approach is addressed by elements of **Policy WLWP4**.
  - Option 2: Require landscaping and protection and enhancement of biodiversity at existing waste sites. Not addressed in WLWP. **This is a reasonable alternative to elements of Policy WLWP4**.
  - Option 3: Derive positive community benefits from waste sites. This approach is addressed by elements of **Policy WLWP4**.



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

- **Issue 5a:** Some waste that could be recycled is managed at residual waste management facilities.
  - Option 1: Proposals for residual waste management facilities should be required to demonstrate that they will only accept waste that is unavoidable. This approach is addressed by elements of **Policy WLWP3**.
  - Option 2: Proposals should be accompanied by a Waste Hierarchy statement that sets out the steps that will be taken to ensure only unavoidable residual waste is managed at the facility and that doing so is the best environmental outcome in line with the waste hierarchy. This approach is addressed by elements of **Policy WLWP3**.

### Safeguarding existing waste sites

**4.5** 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.

**4.6** 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**.

**4.7** 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 emerging 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.

### Likely effects of the reasonable alternative policy approaches

**4.8** In summary, the four reasonable alternative policy approaches that have been assessed 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**)

**4.9 Table 4.1:** Summary of IIA findings for the reasonable alternative policy approaches to the emerging WLWP 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 4.1: Summary of IIA findings for the reasonable alternative policy approaches to the emerging WLWP**

<b>IIA Objectives</b>	<b>Issue 1a, Option 3 Areas of Search or site allocations</b>	<b>Issue 1b, Option 2 External residual waste facilities</b>	<b>Issue 1b, Option 3 Ambitious targets for waste reduction</b>	<b>Issue 4b, Option 2 Landscaping and biodiversity</b>
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	+
IIA8: Open spaces and townscapes	0?	0	0	+
IIA9: Water	0?	0	0	+
IIA10: Flooding	0?	0	0	+

<b>IIA Objectives</b>	<b>Issue 1a, Option 3 Areas of Search or site allocations</b>	<b>Issue 1b, Option 2 External residual waste facilities</b>	<b>Issue 1b, Option 3 Ambitious targets for waste reduction</b>	<b>Issue 4b, Option 2 Landscaping and biodiversity</b>
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**

**4.10** 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.

**4.11** 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**

**4.12** 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**

**4.13** Issue 1a, Option 3 and Issue 1b, Option 3 are likely to have a positive effect in relation to this IIA objective as they 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.

**4.14** 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.

**4.15** 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**

**4.16** 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.

**4.17** 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**

**4.18** 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.

**4.19** 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**

**4.20** 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**

**4.21** 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.

**4.22** 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 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**

**4.23** 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.

**4.24** 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**

**4.25** 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.

**4.26** 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**

**4.27** 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.

**4.28** 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**

**4.29** 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.



**4.30** 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.

**4.31** 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**

**4.32** 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.

**4.33** 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.

**4.34** The remaining options are likely to have a negligible effect on this objective.

## Chapter 5

### IIA of the emerging West London Waste Plan

**5.1** This chapter records the IIA findings for the emerging WLWP . The emerging Regulation 18 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: 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.

**5.2** There are five strategic policies set out in the emerging 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 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

### Vision and strategic objectives

**5.3** Section 7 of the WLWP Regulation 18 document outlines the vision and strategic objectives for the emerging plan.

**5.4** The overarching vision for emerging WLWP is:

To contribute to the ambition of being **net zero** by 2030 across west London, land to be used for waste management through to 2041 will focus on the **efficient and flexible use of safeguarded waste sites, railheads and wharves**. 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 unavoidable residual waste through high efficiency low-carbon recovery facilities if needed.

The **existing 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 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, and
- 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 current **environmental standards** as a minimum and meet evolving operational needs.

**5.5** 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 arisings 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.

**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 projects to be integrated with local energy supply 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 inc greenhouse gas emissions.

Likely effects of the overarching vision and strategic objectives

**5.6** Given the clear aspirational relationship between the overarching vision and five strategic objectives, these two components of the WLWP Regulation 18 document 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.

Table 5.1: Summary of IIA findings for the emerging 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	+
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	++	+	+	+	+	+
IIA12: Mineral resources and Soils	+	+	0	0	+	-

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

**5.7** 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.

**5.8** 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.

**5.9** 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.

**5.10** 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**

**5.11** 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.

**5.12** 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.

**5.13** 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**

**5.14** 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.

**5.15** 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**

**5.16** 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**

**5.17** 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.

**5.18** 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.

**5.19** 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**

**5.20** The Vision makes no specific references to the historic environment, therefore its effects in relation to this IIA objective is considered to be negligible.

**5.21** 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.

**5.22** 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**

**5.23** The Vision makes no specific references to biodiversity and geodiversity, therefore its effects in relation to this IIA objective is considered to be negligible.

**5.24** 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.

**5.25** 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**

**5.26** 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.

**5.27** 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.

**5.28** 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.

**5.29** 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**

**5.30** The Vision makes no specific references to the water environment, therefore its effect in relation to this IIA objective is considered to be negligible.

**5.31** 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.

**5.32** 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**

**5.33** 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.

**5.34** 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.

**5.35** 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**

**5.36** 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.

**5.37** 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**

**5.38** 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.

**5.39** 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.

**5.40** 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

**5.41** There are six policies in Section 10 the emerging Regulation 18 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 & 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.

**5.42** 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 emerging WLWP would be applied when making decisions on the suitability of any proposals for new waste development in West London.

**5.43** Relevant policies included in the adopted Local Plan of the Borough or authority within which the proposal is located will also be applied. Where there is overlap between the policies of the Borough's Local Plans and the policies in this Plan, 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.

### Likely effects of the policies

**5.44** 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 policies

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
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	+	+	-	+/-?	+	+

**5.45** 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**

**5.46** 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.

**5.47** 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.

**5.48** 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.

**5.49** 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.

**5.50** 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.

**5.51** 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.

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

**5.52** 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.

**5.53** 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.

**5.54** 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.

**5.55** 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 potential development of residual waste facilities, which are at the bottom of the waste hierarchy. As such, minor negative effects are expected in relation to IIA2.

**5.56** 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.

**5.57** 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.

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

**5.58** 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. Furthermore, WLWP 1 supports the release of safeguarded land for other uses only when capacity is shown to be surplus to requirement for London as whole. In such instances, there is potential for new alternative uses to also provide employment opportunities and contribute to the local economy. Therefore, these policies are expected to have a minor positive effect on this IIA objective.

**5.59** 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.

**5.60** 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.

**5.61** 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.

### **IIA objective 4: Protect and improve people's health**

**5.62** 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.). Therefore, minor positive effects are identified with relation to this IIA objective.

**5.63** 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.

**5.64** 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. 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.

**5.65** Policy WLWP 4 employs a wide range of measures to avoid adverse impacts from development, including those that compromise the health and wellbeing of local communities (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, a significant positive effect is recorded, mixed with the potential for some uncertain minor adverse effects in relation to IIA4.

**5.66** 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.

**5.67** 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 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.

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

**5.68** 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.

**5.69** 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. Therefore, overall, the effects identified for IIA5 are mixed minor positive and minor negative.

**5.70** 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.

**5.71** 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.

**5.72** Policy WLWP 5 would have a negligible effect on this IIA objective.

**5.73** 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.

## **IIA objective 6: Protect and enhance the historic environment**

**5.74** 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.

**5.75** 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.

**5.76** 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.

**5.77** 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. Furthermore, the supporting text 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. Furthermore, potential impacts on the historic environment could be mitigated through implementation of the requirements of the relevant Local Plan and London Plan policies.

**5.78** 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.

**5.79** Policy WLWP 6 would have a negligible effect on this IIA objective.

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

**5.80** 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.

**5.81** 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.

**5.82** 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.

**5.83** Policy WLWP 4 does not make specific reference to biodiversity, however 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 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. Furthermore, 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. 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.



**5.84** 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.

**5.85** Policy WLWP 6 would have a negligible effect on this IIA objective.

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

**5.86** 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.

**5.87** 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.

**5.88** 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.

**5.89** 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.

**5.90** 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.

**5.91** 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.

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

**5.92** 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.

**5.93** 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.

**5.94** 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.

**5.95** 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.

**5.96** 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 minimise leachate from sites, 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. However, the initial use of land for waste may result in negative effects on water quality and quantity if not properly managed, as some leachate may still be released. As such, a mixed minor positive and minor negative effect is expected in relation to IIA9.

**5.97** Policy WLWP 6 would have a negligible effect on this IIA objective.

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

**5.98** 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.

**5.99** 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.

**5.100** 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.

**5.101** 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.

**5.102** 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.

**5.103** Policy WLWP 6 would have a negligible effect on this IIA objective.

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

**5.104** 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.

**5.105** 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.

**5.106** 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.

**5.107** 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.

**5.108** 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.

## **IIA objective 12: Protect and enhance mineral resources and soils**

**5.109** 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.

**5.110** 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.

**5.111** 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.

**5.112** 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.

**5.113** 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.

**5.114** 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.

## Recommendations

**5.115** As discussed in Chapter 2, 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. These recommendations 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.

**5.116** 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 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.

## Equalities Impact Assessment, Health Impact Assessment and Strategic Environmental Assessment

**5.117** The EqIA and HIA criteria are embedded within the IIA objectives used to appraise the emerging WLWP.

**5.118** With regards to equality, the vision, strategic objectives and policies for the emerging 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 emerging WLWP does indirectly give consideration to the potential effects of waste development on specific groups, 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.

**5.119** With regards to HIA and SEA, the following paragraphs provide commentary relevant to health outcomes and each IIA objective.

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

**5.120** Minimising emissions from waste within the emerging 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.

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

**5.121** The emerging 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.

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

**5.122** Support for waste development within the emerging WLWP is expected to have a positive effect on population health and material assets due to creation of jobs. Investment in waste management will also have benefits for the local economy, which will in turn have positive benefits for the mental health of local populations, as well as physical health.

## IIA objective 4: Protect and improve people's health

**5.123** Policy requirements in the emerging 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 health of local populations, as well as physical health.

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

**5.124** Support for sustainable transport in the emerging 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 health of local populations, as well as physical health.

## IIA objective 6: Protect and enhance the historic environment

**5.125** The emerging 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 emerging 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.

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

**5.126** Policy requirements in the emerging 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 will avoid adverse effects on and have positive effects for the mental health of local populations, as well as physical health.

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

**5.127** The emerging 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 positive benefits for the physical and mental health of local populations.



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

**5.128** There is indirect support in the emerging 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 will avoid adverse effects on and have positive effects for the physical and mental health of local populations.

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

**5.129** 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 and mental health and wellbeing of local populations.

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

**5.130** Minimising pollution and the effects of pollution from new development is directly addressed in Policy WLWP 4 and would avoid adverse effects on and have a positive effect on physical and mental health and wellbeing.

## IIA objective 12: Protect and enhance mineral resources and soils

**5.131** Protecting and enhancing mineral resources and soils by promoting effective, efficient and sustainable use of land in the emerging WLWP will have a negligible effect on physical and mental health.



## Chapter 6

# Conclusions, monitoring and other reporting requirements

**6.1** This chapter summarises the conclusions of the IIA findings for the Regulation 18 WLWP, and discusses the next steps in the IIA process that will be needed in terms of monitoring and reporting.

## Reporting requirements

**6.2** The SEA Regulations require that the environmental report (in this case the IIA report) describes how the appraisal has been taken into account in plan making. In preparing the Regulation 18 WLWP, the waste planning authorities identified alternative policy approaches (options) to addressing each issue, prior to drafting the policies within the Regulation 18 plan. Those 'options' were considered as part of defining the reasonable alternatives within the IIA, and subject to appraisal (see Chapter 4).

**6.3** The IIA provided recommendations in relation to the objectives and policies during the drafting of the Regulation 18 WLWP, as explained in Chapters 2 and 5. These recommendations were considered by the waste planning authorities and incorporated in the final versions of the policies.

## Monitoring

**6.4** 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.

**6.5** 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 will be proposed in the next iteration of the IIA Report in relation to all of the IIA objectives in the IIA Framework. Once the emerging WLWP is adopted and its policies are implemented, the likely significant effects may become more certain. With each monitoring report the waste planning authorities may wish to narrow down the monitoring framework to focus only on those effects of the emerging WLWP that are likely to be significantly adverse.

**6.6** The indicators that will be suggested for monitoring the potential sustainability effects of implementing the emerging WLWP will draw from the monitoring indicators included within the Regulation 19 draft plan and therefore the data collected will be the responsibility of the waste planning authorities. Additional indicators and their corresponding data in many cases will be provided by outside bodies, for example the Environment Agency or Natural England. 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.

## Conclusions

**6.7** This document has considered the sustainability implications of the draft policies in the Regulation 18 West London Waste Plan. These have been subject to assessment against the IIA objectives developed at the scoping stage of the IIA process.

**6.8** Overall, the Regulation 18 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 18 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 emerging WLWP Policy WLWP 2 and Policy WLWP 4), which combined with other development management policies found in the Boroughs' and OPDC's Local Plan should help to minimise any adverse effects of new or redeveloped waste sites.

## Next steps

**6.9** This IIA Report will be available for consultation alongside the WLWP (Regulation 18) document at the end of 2025. Following the period of public consultation, the feedback received on both the WLWP and the IIA Report will be considered by the waste planning authorities in preparing the Regulation 19 WLWP, and another iteration of IIA will be undertaken and reported on. An IIA Report will be published alongside the Regulation 19 WLWP for a further round of public consultation before the WLWP is submitted for independent examination. A Planning Inspector appointed by the Secretary of State will consider its content and any objections to it, and reach a decision on its overall ‘soundness’ before it can proceed to be adopted.

**6.10** Once the plan is adopted it will form part of the development plan for each of the West London authorities.

## 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.

## 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.

## 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.

## Resources and Waste Strategy for England (2018)

### Key objectives relevant to the WLWP

- Sets out how to preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy in England.
- It identifies five strategic ambitions:
  - To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025;
  - To work towards eliminating food waste to landfill by 2030;
  - To eliminate avoidable plastic waste 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.

### Key targets and indicators relevant to the WLWP

- No targets or indicators.

### Implications for the WLWP

- Allocate sites and develop policies in line with the Resources and Waste Strategy.

### 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 (2008) Future Water: The Government’s Water Strategy for England

### Key objectives relevant to the WLWP

- Sets out how the Government want the water sector to look by 2030 and an outline of the steps which need to be taken to get there.
- The vision for 2030 is one where we, as a country have:

- “improved the quality of our water environment and the ecology it supports, and continue to maintain high standards of drinking water quality from taps;
- Sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface water;
- Ensure a sustainable use of water resources, and implement fair, affordable and cost-reflective water charges;
- Cut greenhouse gas emissions; and
- Embed continuous adaptation to climate change and other pressures across the water industry and water users”.

### **Key targets and indicators relevant to the WLWP**

- No targets or indicators.

### **Implications for the WLWP**

- Policies should aim to contribute to the vision set out in this Strategy.

### **Implications for the IIA**

- Include IIA objectives which seek to protect, manage and enhance the water environment and promote water management and efficiency.

## **Environment Agency (2009): Water for People and the Environment: Water Resources Strategy for England and Wales**

### **Key objectives relevant to the WLWP**

- The Strategy vision for water resource “is for there to be enough water for people and the environment, meeting legitimate needs”.
- Its aims include:
  - To manage water resource and protect the water environment from climate change.
  - Restore, protect, improve and value species and habitats that depend on water.
  - To contribute to sustainable development through good water management.

- People to understand how water and the water environment contribute to their quality of life.

### **Key targets and indicators relevant to the WLWP**

- No targets or indicators.

### **Implications for the WLWP**

- Policies should reflect the aims of the strategy where relevant.

### **Implications for the IIA**

- Include IIA objective which seeks to promote water management and efficiency.

## **DEFRA (2009) Safeguarding our Soils: A Strategy for England**

### **Key objectives relevant to the WLWP**

- The vision is “by 2030, all England’s soils will be managed sustainability and degradation threats tackled successfully. This will improve the quality of England’s soils and safeguard their ability to provide essential services for future generations”.
- The Strategy highlights the areas for priority including:
  - Better protection for agricultural soils.
  - Protecting and enhancing stores of soil carbon.
  - Building the resilience of soils to a changing climate.
  - Preventing soil pollution.
  - Effective soil protection during construction and development.
  - Dealing with our legacy of contaminated land.

### **Key targets and indicators relevant to the WLWP**

- No targets or indicators.

### Implications for the WLWP

- Ensure that site allocations and policies will help protect and enhance the quality of soils and seek to sustainably manage their quality for future generations.

### Implications for the IIA

- Include IIA objective which seeks to safeguard and enhance the quality of soil.

DEFRA (2007): The Air Quality Strategy for England, Scotland, Wales and Northern Ireland

### Key objectives relevant to the WLWP

- Make sure that everyone can enjoy a level of ambient air quality in public spaces, which poses no significant risk to health or quality of life.
- Render polluting emissions harmless.

### Key targets and indicators relevant to the WLWP

- Sets air quality standards for 13 air pollutants.

### Implications for the WLWP

- Develop policies that aim to meet the standards.

### Implications for the IIA

- Include sustainability objectives to reduce pollution and protect and improve air quality.

DEFRA Clean Air Strategy 2019

### Key objectives relevant to the WLWP

- The Clean Air Strategy 2019 sets out actions to improve air quality by reducing pollution from a wide range of sources. The Clean Air Strategy informs the detailed National Air Pollution Control Programme.

## Key targets and indicators relevant to the WLWP

- No targets or indicators.

## Implications for the WLWP

- Ensure that site allocations and policies will contribute to maintaining and improving air quality.

## Implications for the IIA

- Include sustainability objectives to protect and improve air quality.

DEFRA and DfT (2017): UK plan for tackling roadside nitrogen dioxide concentrations

## Key objectives relevant to the WLWP

- The strategy aims to help local authorities by setting up a £225 million implementation fund, establishing a clear air fund and £100 million for retrofitting and new low emission buses.

## Key targets and indicators relevant to the WLWP

- No targets or indicators.

## Implications for the WLWP

- Ensure that site allocations and policies will contribute to maintaining and improving air quality.

## Implications for the IIA

- Include sustainability objectives to protect and improve air quality.

## DEFRA (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services

### Key objectives relevant to the WLWP

- The strategy aims to guide conservation efforts in England up to 2020 and move from a net biodiversity loss to gain. The strategy includes 22 priorities which include actions for the following sectors:
  - Agriculture;
  - Forestry;
  - Planning and Development;
  - Water Management;
  - Marine Management;
  - Fisheries;
  - Air Pollution; and
  - Invasive Non-Native Species.

### Key targets and indicators relevant to the WLWP

- The strategy develops ambitious yet achievable goals for 2020 and 2050, based on Aichi Targets set at the Nagoya UN Biodiversity Summit in October 2010.

### Implications for the WLWP

- Develop policies that promote conservation and enhancements of biodiversity and ensure that site allocations take account of the aims of the strategy.

### Implications for the IIA

- Include sustainability objective that relates to biodiversity.

## DEFRA (2011): Securing the Future: Delivering UK Sustainable Development Strategy

### Key objectives relevant to the WLWP

- Enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life for future generations.
- There are 4 shared priorities:
  - sustainable consumption and production;
  - climate change and energy;
  - natural resource protection and environmental enhancement; and
  - sustainable communities.

### Key targets and indicators relevant to the WLWP

- Sets out indicators to give an overview of sustainable development and priority areas in the UK.
- They include 20 of the UK Framework indicators and a further 48 indicators related to the priority areas.

### Implications for the WLWP

- Ensure that site allocations and policies meet the aims of the Sustainable Development Strategy.

### Implications for the IIA

- Include sustainability objectives to cover the Strategy's shared priorities.

## DoH (2010): Healthy Lives, Healthy People: our Strategy for public health in England

### Key objectives relevant to the WLWP

- Protect the population from serious health threats; helping people live longer, healthier and more fulfilling lives; and improving the health of the poorest, fastest.
- Prioritise public health funding from within the overall NHS budget.

### Key targets and indicators relevant to the WLWP

- No targets or indicators.

### Implications for the WLWP

- Ensure that site allocations and policies reflect the objectives of the strategy.

### Implications for the IIA

- Include a sustainability objective relating to health and well-being.

## DECC (2014): Community Energy Strategy

### Key objectives relevant to the WLWP

- Sets out plans to promote and facilitate the planning and development of decentralised community energy initiatives in four main types of energy activity:
  - Generating energy (electricity or heat)
  - Reducing energy use (saving energy through energy efficiency and behaviour change)
  - Managing energy (balancing supply and demand)
  - Purchasing energy (collective purchasing or switching to save money on energy)



## Key targets and indicators relevant to the WLWP

- No targets or indicators.

## Implications for the WLWP

- Ensure that site allocations and policies will support community low carbon and renewable energy provision including electricity, heat and transport.

## Implications for the IIA

- Include a sustainability objective relating to increasing energy provided from decentralised low carbon and renewable sources.

## HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment

### Key objectives relevant to the WLWP

- The 25 Year Environment Plan sets out government action to tackle a wide range of environmental pressures.
- The 25 Year Environment Plan identifies six areas around which action will be focused. These include:
  - Using and managing land sustainably.
  - Recovering nature and enhancing the beauty of landscapes.
  - Connecting people with the environment to improve health and wellbeing.
  - Increasing resource efficiency and reducing pollution and waste.
  - Securing clean, productive and biologically diverse seas and oceans.
  - Protecting and improving the global environment.

### Key targets and indicators relevant to the WLWP

- The 25 Year Environment sets out ambitious goals to manage pressures on the environment in the UK, based on England's 159 National Character Areas and monitoring indicators.

## Implications for the WLWP

- Develop policies that promote conservation and enhancements of the natural environment and ensure that site allocations take account of the goals of the Environment Plan.

## Implications for the IIA

- Include sustainability objective that relates to the protection of the natural environment.

## HM Government (2018) Our Waste, Our Resources: A strategy for England (2018)

### 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 avoidable<sup>15</sup> 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.

## Environment Agency (2022) National Flood and Coastal Erosion Risk Management Strategy for England

## Key objectives relevant to the WLWP

- The strategy outlines a series of measures risk management authorities must undertake to manage flood and coastal erosion risk.

## 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.

## Implications for the IIA

- Include a 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 (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.

## 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

## 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 (Upcoming)

- The Greater London Authority is currently preparing a Local Nature Recovery Strategy for London. This is a new system of spatial biodiversity strategies that will involve all 33 of the London boroughs as well as its six neighbouring counties, including Essex. It will provide a statement of London's strategic biodiversity priorities and a fully updated and comprehensive spatial habitat map.
- The strategy is intended to be completed in 2025.

### 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 policies:
  - 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 provides guidance for 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 provides guidance for 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.

## 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

## The Control of Dust and Emissions During Construction and Demolition (2014)

### Key objectives relevant to the Waste Local Plan

- 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 Waste Local Plan.

### Key targets and indicators relevant to the Waste Local Plan

- 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 targets and indicators relevant to the Waste Local Plan.

### Implications for the Waste Local Plan

- 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 Waste Local Plan

- This document provides guidance for 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 Waste Local Plan.

### Key targets and indicators relevant to the Waste Local Plan

- This document provides guidance for 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 Waste Local Plan.

### Implications for the Waste Local Plan

- 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 Waste Local Plan

- 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 Waste Local Plan

- None above the requirements of the London Plan.

### Implications for the Waste Local Plan

- 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.

## Urban Greening Factor (2023)

### Key objectives relevant to the Waste Local Plan

- 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 Waste Local Plan

- 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 Waste Local Plan

- 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 Waste Local Plan

- This document is a long-term plan to coordinate the development of 'sustainable drainage' systems across London. The plan was developed by the Drain London Programme, a partnership of the Mayor of London, Environment

Agency, London Councils 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 Waste Local Plan**

- 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 Waste Local Plan**

- 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

## **Thames Estuary 2100 Plan**

### **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

- 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.
- 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

## 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

### 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.

## Thames Estuary 2100 (TE2100) Plan

### Key objectives relevant to the WLWP

- Take an adaptive approach to manage tidal flooding and create climate-resilient communities.
- Take an adaptive approach to manage tidal flooding and create climate-resilient communities.
- Take an adaptive approach to manage tidal flooding and create climate-resilient communities.

### Key targets and indicators relevant to the WLWP

- Ensure major tidal flood risk management decisions are made adaptively by 2040, using monitoring evidence and reviewing the plan at least every 10 years.
- Embed carbon reduction pathways within this Plan, striving to achieve carbon net zero status.

### Implications for the WLWP

- Ensure waste management infrastructure is designed to minimise flood risk and support climate adaptation, carbon reduction, and environmental net gain.

### Implications for the IIA

- Include sustainability objectives and assessment criteria on climate adaptation, flood risk minimisation, community resilience, carbon reduction, and biodiversity enhancement.

## Appendix B

### Responses from Statutory Consultees to the WLWP Scoping Report

#### Historic England

**Table B.1: 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.
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: <a href="https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/">https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/</a>	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,	Noted. No action required.

Comment	IIA Team Response
despite the IIA, have adverse effects on the historic environment.	

## Natural England

**Table B.2: 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 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.	Noted. No action required.
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.3: Environment Agency**

Comment	LUC Response
<p>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. 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:</p> <ul style="list-style-type: none"> <li>- The Thames River Basin Management Plan 2022</li> <li>- The National Framework for Water Resources 2020</li> <li>- The Water Framework Directive 2017</li> </ul> <p>We also suggest that the following policies related to biodiversity and local catchment and river basin management plans are included:</p> <ul style="list-style-type: none"> <li>- Biodiversity Net Gain</li> <li>- Thames21 5 Year Plan</li> <li>- Nature Based Solutions (IUCN)</li> </ul>	<p>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 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.</p>
<p>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.</p>	<p>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.</p>

Comment	LUC Response
<p>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 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.</p>	
<p>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.</p>	<p>Noted. No action required.</p>
<p>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).</p>	<p>Noted. No action required.</p>

Comment	LUC Response
<p>We believe that the report lacks reference to <a href="#">regulation 33 of the Water Framework Directive (WFD)</a>, Councils have a legal responsibility to have regard for the <a href="#">Thames River Basin Management Plan</a>, 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 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.</p>	<p>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).</p>
<p>We would also like to see reference to the <a href="#">Catchment Data Explorer</a> 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.</p>	<p>Further information has been included in the baseline in Appendix C explaining why water bodies within the WLWP area are not achieving 'good' status.</p>
<p>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</p>	<p>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.</p>



Comment	LUC Response
will require safeguarding of land adjacent to the Thames to allow the defence raising to take place.	
We would also like to see specific reference to paragraph 162 of the National Planning Policy Framework which states that: <b>‘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’.</b>	The review of relevant plans, policies and programmes has been updated in this IIA Report to include reference to paragraph 162 of the NPPF.
We also recommend that the report includes that commercial developments such as waste facilities achieve a <a href="#">BREEAM rating of ‘excellent’</a> 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	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

Comment	LUC Response
spaces (Policy D8 I, page 135; Policy G5 A, page 322).	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 comprehensive view of biodiversity assets in the area. Please add all locally designated biodiversity assets including LNCs, SINCS, river and canal network, wildlife corridors.	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.)
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?	IIA Objectives 4, 7 and 10 within the IIA Framework have been updated to include these appraisal questions where appropriate.

Comment	LUC Response
<ul style="list-style-type: none"> <li>- Will it avoid harm, protect, and improve local populations of aquatic and wetland species that are of international, national, regional or local importance?</li> <li>- 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?</li> <li>- Will it avoid negative impact on water quality and therefore biodiversity particularly within aquatic/wetland habitats?</li> <li>- Will it maintain or contribute towards an improved Water Framework Directive ecological status?</li> <li>- Will it promote public access and engagement with green and blue spaces?</li> <li>- Will it incorporate Nature Based Solutions to deliver multiple benefits to people and nature at the same time?</li> </ul>	

## Appendix C

### Baseline

**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 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 box 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” [\[See reference 29\]](#) has been prepared to inform the emerging updated WLWP supported by baseline and forecasts for C,D&E waste [\[See reference 30\]](#) and Hazardous Waste in the Plan area [\[See reference 31\]](#). Drafts of these documents have been used to prepare the following text. The baseline will be updated within future iterations of the IIA as more information becomes available.

**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 [\[See reference 32\]](#).

**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, in connection with 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 S I 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, estimated to be c33,500 tonnes per annum at 2025 declining to c17,500 tonnes per annum in 2041, there will be a need to export residual waste for which landfill remains the only management option through to 2041.

**C.16** The cumulative non-inert waste landfill capacity requirement for the whole Plan area is estimated to be c. 0.43Mt by 2041.

### **Permanent Deposit to Land Management Capacity for Inert Waste**

**C.17** There is a predicted shortfall in inert excavation waste permanent deposit to land capacity throughout the Plan period. This will need to be met either through export or incorporation into development sites for such purposes as acoustic or visual bunding or flood alleviation.

### **Management Capacity for Hazardous Waste**

**C.18** There is sufficient capacity to manage the forecast hazardous waste arisings in the Plan area with the exception of milestone 2031 when arisings are forecast to peak but then tail off. 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.19** 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.20** 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) [\[See reference 33\]](#).

**C.21** 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 [\[See reference 34\]](#). 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) [\[See reference 35\]](#).

**C.22** The Intergovernmental Panel on Climate Change (IPCC) special report on global warming outlines that, under emissions in line with current pledges under the Paris Agreement, global warming is expected to surpass 1.5°C, even if these pledges are supplemented with very challenging increases in the scale and ambition of



mitigation after 2030. This increased action would need to achieve net zero CO<sub>2</sub> emissions in less than 15 years [\[See reference 36\]](#).

**C.23** 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 [\[See reference 37\]](#). The Mayor declared a climate emergency shortly after the Assembly and set a target for London to be net zero-carbon by 2030.

**C.24** Climate change emergencies have been declared by each of the West London Boroughs. These occurred in:

- London Borough of Brent: July 2019 [\[See reference 38\]](#)
- London Borough of Ealing: April 2019 [\[See reference 39\]](#)
- London Borough of Harrow: July 2019 [\[See reference 40\]](#)
- London Borough of Hounslow: June 2019 [\[See reference 41\]](#)
- London Borough of Hillingdon: January 2020 [\[See reference 42\]](#)
- London Borough of Richmond upon Thames: July 2019 [\[See reference 43\]](#)

**C.25** 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.26** 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 [\[See reference 44\]](#):

- 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.27** 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 [\[See reference 45\]](#):

## 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.28** Carbon dioxide (CO<sub>2</sub>) is the main greenhouse gas, accounting for about 80% of the UK greenhouse gas emissions. Emissions are produced when fossil fuels such as coal or gas are burnt or processed. In recent years, increasing emphasis has been placed on the role of regional bodies and local government in contributing to energy efficiency improvements, and hence reductions in carbon dioxide emissions. In line with the wider UK, London has seen a decrease in CO<sub>2</sub> 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.29** The Government regularly publishes local authority and regional carbon dioxide emissions national statistics [\[See reference 46\]](#). The statistics are largely consistent with the UK national Greenhouse Gas Inventory and with the Devolved Administration Greenhouse Gas Inventories. In London, CO<sub>2</sub> emissions have fallen from 6.4 tonnes (t) per capita to 2.9t per capita (equivalent to a 75% reduction) from 2005 to 2022. Emissions in each of the West London Boroughs (excluding OPDC) are like those of London, falling steadily over the same period as demonstrated in **Table C.1 (Total Emissions)** and **Table C.2 (Per Capita Emissions)**.

**Table C.1: CO<sub>2</sub> emissions estimates in the WLWP Area 2005-2022 (Kt)**

Year	Brent	Ealing	Harrow	Hounslow	Hillingdon	Richmond
2005	1,514.9	1,796.1	1,050.7	1,664.3	2,399.9	1,081.7
2006	1,535.3	1,814.0	1,035.0	1,693.3	2,385.1	1,076.0
2007	1,492.1	1,792.6	1,010.4	1,646.7	2,280.8	1,049.8
2008	1,492.9	1,754.9	1,002.4	1,568.6	2,374.8	1,022.9
2009	1,508.3	1,614.6	907.0	1,463.4	2,122.7	931.5
2010	1,370.7	1,678.2	991.6	1,566.6	2,144.8	969.2
2011	1,363.7	1,559.4	889.6	1,460.2	1,870.6	863.4
2012	1,224.4	1,652.3	946.1	1,520.9	2,116.7	925.5
2013	1,421.0	1,640.7	915.7	1,465.5	2,072.5	907.1
2014	1,379.7	1,441.9	801.8	1,308.4	1,780.3	790.8
2015	1,159.5	1,347.3	773.0	1,203.4	1,708.0	750.6
2016	1,072.6	1,250.9	728.1	1,130.7	1,631.6	711.9

Year	Brent	Ealing	Harrow	Hounslow	Hillingdon	Richmond
2017	1,030.8	1,209.1	691.0	1,061.7	1,564.2	674.8
2018	1,000.4	1,197.8	690.2	1,049.8	1,537.9	666.1
2019	1,022.5	1,125.3	662.6	995.4	1,480.8	631.5
2020	972.7	1,021.3	604.4	860.6	1,229.7	572.6
2021	898.8	1,115.8	611.9	943.4	1,343.5	623.1
2022	971.0	1,049.6	556.0	904.8	1,327.8	572.5

**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	5.7	5.7	4.8	7.4	9.5	6.0
2006	5.4	5.8	4.6	7.4	9.4	5.9
2007	5.3	5.6	4.5	7.1	8.9	5.8
2008	5.2	5.4	4.4	6.6	9.1	5.6
2009	4.6	4.9	3.9	6.0	8.0	5.1
2010	4.5	5.0	4.2	6.3	8.0	5.2
2011	3.9	4.6	3.7	5.7	6.8	4.6
2012	4.4	4.8	3.8	5.8	7.5	4.9
2013	4.2	4.6	3.6	5.5	7.3	4.7
2014	3.5	4.1	3.1	4.9	6.1	4.1
2015	3.2	3.8	3.0	4.4	5.8	3.9
2016	3.1	3.5	2.8	4.1	5.5	3.7
2017	3.0	3.4	2.7	3.8	5.2	3.5
2018	3.1	3.3	2.7	3.8	5.1	3.4
2019	2.9	3.1	2.6	3.5	4.9	3.2
2020	2.6	2.8	2.3	3.0	4.0	2.9
2021	2.9	3.0	2.3	3.3	4.4	3.2
2022	2.6	2.8	2.1	3.1	4.3	2.9

**C.30** The Department for Energy Security and Net Zero produced the following consumption figures for the WLWP area in 2022 [\[See reference 47\]](#):

- **Electricity** – a total of 542.5ktoe predominantly through industrial and commercial use;
- **Petroleum** – a total of 664.2ktoe predominantly through road transport;
- **Bioenergy and wastes** – a total of 55.6ktoe, predominantly through road transport;
- **Coal** – a total of 0.6 kilo tonnes of oil equivalent (ktoe) predominantly through domestic use;
- **Manufactured fuels** – a total of 1.2ktoe predominantly through domestic use; and,
- **Gas** – a total of 899.1ktoe predominantly through domestic use.

**C.31** Between 2005 and 2022 the total reported energy consumption (all fuels) for London fell from 14,133.5 to 10,779.2ktoe. 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 2022**

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)	Percentage change
Coal	28.6	15.0	47.6% decrease
Manufactured fuels	8.9	4.6	48.3% decrease
Petroleum	3,645.7	2,801.0	23.2% decrease
Gas	6,865.8	4,760.9	30.7% decrease
Electricity	3,562.8	2,962.6	16.8% decrease
Bioenergy and wastes	21.7	235.1	983.4% increase
<b>Total</b>	<b>14,133.5</b>	<b>10,779.2</b>	<b>23.7% decrease</b>

**Table C.4: Energy Consumption in Brent - 2005 to 2022**

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)	Percentage change
Coal	1.2	0.6	50% decrease

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)	Percentage change
Manufactured fuels	0.1	0.1	No change
Petroleum	119.3	93.3	21.8% decrease
Gas	227.3	167.1	26.5% decrease
Electricity	104.9	97.7	6.8% decrease
Bioenergy and wastes	0.5	8.7	1640% increase
<b>Total</b>	<b>453.3</b>	<b>367.4</b>	<b>19% decrease</b>

Table C.5: Energy Consumption in Ealing - 2005 to 2022

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)	Percentage change
Coal	1.3	0.7	46.2% decrease
Manufactured fuels	0.2	0.1	50% decrease
Petroleum	158.4	117.6	25.8% decrease
Gas	259.9	186.7	28.2% decrease
Electricity	114.4	115.4	0.9% increase
Bioenergy and wastes	0.6	10.0	1566% increase
<b>Total</b>	<b>534.8</b>	<b>430.4</b>	<b>19.5% decrease</b>

Table C.6: Energy Consumption in Harrow - 2002 to 2025

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)	Percentage Change
Coal	0.5	0.2	60% decrease
Manufactured fuels	0.1	0.1	No change
Petroleum	69.3	54.6	21.2% decrease
Gas	210.9	129.8	38.5% decrease
Electricity	59.2	44.1	25.5% decrease

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)	Percentage Change
Bioenergy and wastes	0.3	4.0	1233% increase
<b>Total</b>	<b>340.3</b>	<b>232.9</b>	<b>31.6% decrease</b>

**Table C.7: Energy Consumption in Hounslow - 2005 to 2022**

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)	Percentage Change
Coal	0.5	0.4	20% decrease
Manufactured fuels	0.2	0.3	50% increase
Petroleum	154.7	120.2	22.3% decrease
Gas	203.9	135.8	33.4% decrease
Electricity	115.5	100.1	13.3% decrease
Bioenergy and wastes	0.5	8.4	1580% increase
<b>Total</b>	<b>475.3</b>	<b>365.1</b>	<b>23.2% decrease</b>

**Table C.8: Energy Consumption in Hillingdon - 2005 to 2022**

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)	Percentage Change
Coal	1.6	1.4	12.5% decrease
Manufactured fuels	0.5	0.5	No change
Petroleum	241.1	212.0	12.1% decrease
Gas	304.7	166.6	45.3% decrease
Electricity	153.6	135.3	11.9% decrease
Bioenergy and wastes	6.1	18.7	206.6% increase
<b>Total</b>	<b>707.6</b>	<b>534.4</b>	<b>25.5% decrease</b>

**Table C.9: Energy Consumption in Richmond - 2005 to 2022**

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)	Percentage Change
Coal	0.5	0.4	20% decrease
Manufactured fuels	0.1	0.1	No change
Petroleum	84.9	66.6	21.5% decrease
Gas	175.2	113.1	35.4% decrease
Electricity	68.1	49.9	26.7% decrease
Bioenergy and wastes	0.3	6.0	1900% increase
<b>Total</b>	<b>329.1</b>	<b>236.1</b>	<b>28.3% decrease</b>

**C.32** 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 [\[See reference 48\]](#):

- Stay within a maximum cumulative carbon dioxide emissions budget of 203.5 million tonnes (MtCO<sub>2</sub>) for the period of 2020 to 2100. At 2017 CO<sub>2</sub> emission levels, London would use this entire budget within 7 years from 2020.
- Initiate an immediate programme of CO<sub>2</sub> mitigation to deliver cuts in emissions averaging a minimum of -12.2% per year to deliver a Paris aligned carbon budget. These annual reductions in emissions require national and local action and could be part of a wider collaboration with other local authorities.
- Reach zero or near zero carbon no later than 2043. The Tyndall Centre report provides an indicative CO<sub>2</sub> reduction pathway that stays within the recommended maximum carbon budget of 203.5 MtCO<sub>2</sub>. At 2043 5% of the budget remains. This represents very low levels of residual CO<sub>2</sub> emissions by this time, or the Authority may opt to forgo these residual emissions and cut emissions to zero at this point. Earlier years for reaching zero CO<sub>2</sub> emissions are also within the recommended budget, provided that interim budgets with lower cumulative CO<sub>2</sub> emissions are also adopted.

**C.33** 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.34** CO<sub>2</sub> 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, 2021 CO<sub>2</sub> emissions are still down 5.0% [\[See reference 49\]](#). The increase in 2021 is primarily due to the increase in the use of road transport as nationwide lockdowns were eased. CO<sub>2</sub> emissions from transport rose 10.0% in 2021, accounting for almost half of the overall increase from 2020 [\[See reference 50\]](#).

**C.35** The overall road energy consumption in London decreased between 2005 and 2022 from 3,068 kilo tonnes of equivalent oil (ktoe) to 2,518.1ktoe. This change was most influenced by the decreasing energy consumption for personal road travel which fell during this period from 2,370.4ktoe to 1,797.3ktoe, potentially attributable to increasing use of electric vehicles (EVs). During this period energy consumption recorded in London for freight uses grew from 697.7ktoe to 720.8ktoe. This growth is due to an increase in outer London, which grew from 449.1ktoe to 509.1ktoe, whilst inner London saw a decrease from 248.6ktoe to 211.7ktoe [\[See reference 51\]](#).

**C.36** 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 [\[See reference 52\]](#).

**C.37** 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.38** 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 [\[See reference 53\]](#) 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.39** 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 [\[See reference 54\]](#), 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.40** 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 2023 [\[See reference 55\]](#).

- In Brent capacity increased from 2.1 MW in 2014 to 9.8 MW in 2023, providing 8,022 MWh of electricity generation in 2023.
- In Ealing capacity increased from 3.4 MW in 2014 to 14.8 MW in 2023, providing 12,241 MWh of electricity generation in 2023.
- In Harrow capacity increased from 1.9 MW in 2014 to 8.4 MW in 2023, providing 7,033 MWh of electricity generation in 2023.
- In Hounslow capacity increased from 11.5 MW in 2014 to 21.7 MW in 2023, providing 12,641 MWh of electricity generation in 2023.
- In Hillingdon capacity increased from 4.3 MW in 2014 to 14.0 MW in 2023, providing 9,983 MWh of electricity generation in 2023.
- In Richmond upon Thames capacity increased from 1.7 MW in 2014 to 7.4 MW in 2023, providing 6,256 MWh of electricity generation in 2023.

**C.41** 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.42** 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 [\[See reference 56\]](#).

**C.43** 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.44** **Figure C.1** at the end of this Appendix illustrates the main areas of the WLWP exposed to flood risk.

**C.45** 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 [\[See reference 57\]](#).

**C.46** 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 [\[See reference 58\]](#).

- 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 [\[See reference 59\]](#).
- 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 [\[See reference 60\]](#).
- 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 [\[See reference 61\]](#)
- 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 [\[See reference 62\]](#).
- 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 [\[See reference 63\]](#).
- 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 [\[See reference 64\]](#).

**C.47** 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’ [\[See reference 65\]](#) indicating climate change impacts on peak rainfall intensity and peak river flows.

## Implications for health

**C.48** 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.49** 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 [\[See reference 66\]](#). 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 [\[See reference 67\]](#).

**C.50** 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. [\[See reference 68\]](#).

**C.51** 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 [\[See reference 69\]](#).

**C.52** 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 km<sup>2</sup> [\[See reference 70\]](#). Hillingdon follows closely as the third least densely populated, with 2,644 people per km<sup>2</sup>. In contrast, Hounslow has a higher population density of 5,147 people per km<sup>2</sup>, while Brent has 7,860 people per km<sup>2</sup>, Ealing has 6,612 people per km<sup>2</sup>, and Harrow has 5,176 people per km<sup>2</sup> [\[See reference 71\]](#).

**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
<b>Total</b>	<b>1,603,600</b>	<b>1,757,500</b>	<b>9.6% increase</b>

**C.53** 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 [\[See reference 72\]](#) [\[See reference 73\]](#). 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.54** 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 [\[See reference 74\]](#). 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.55** 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 km<sup>2</sup>) than the London average of 5,690 people per km<sup>2</sup> [\[See reference 75\]](#). 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.56** 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) [\[See reference 76\]](#). 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.57** 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 2023/24 achieved just 62% of its target to 52,297 homes [\[See reference 77\]](#).

**C.58** To date, Brent has achieved 10,500 completions since 2019/20, Ealing has achieved 6,566, Harrow has achieved 4,145, Hounslow has achieved 6,715, Hillingdon has achieved 4,996, Richmond upon Thames has achieved 868, and the OPDC has achieved 2,854 [\[See reference 78\]](#), 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 [\[See reference 79\]](#). None 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.59** 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 [\[See reference 80\]](#). 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.60** Health is a cross-cutting topic and as such many topic areas explored in this Scoping Report influence health either directly or indirectly.

**C.61** 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 [\[See reference 81\]](#).

**C.62** 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.63** Data is not available regarding the Health Index score in relation to the Old Oak and Park Royal Development Corporation area.



Waste crime

**C.64** 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.65** 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. [\[See reference 82\]](#).

**C.66** In the WLWP authority areas, the number of fly-tipping incidents reported is shown in **Table C.11**, 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 [\[See reference 83\]](#).

**Table C.11: Fly-tipping incidents reported by local authorities in WLWP area 2012/2023/24**

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.67** 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 84]. The Indices of Multiple Deprivation (IMD) 2019 [See reference 85] 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 1.11 times more income-deprived than the average in London. Compared to the rest of England, Brent is 1.46 times more income-deprived, indicating that the borough experiences greater income deprivation than the national average [See reference 86]. The local authority area ranked 49th out of 317 local authorities in 2019, placing it within the 15% most income-deprived local authorities in England.
- In Ealing, the income deprivation rate is equivalent to the London average, although is 1.32 times more income-deprived than the average in the rest of England. The local authority area ranked 88th out of 317 local authorities in 2019, placing it within the 30% most income-deprived local authorities in England.
- Harrow is on average less income-deprived in comparison to London, with a relative deprivation ratio of 0.82, although is 1.08 times more income-deprived than the average in the rest of England. The local authority area ranked 199th out of 317 local authorities in 2019, placing it within the 40% most income-deprived local authorities in England.
- Hounslow is on average less income-deprived in comparison to London as a whole, with a relative deprivation ratio of 0.96, although the local authority is 1.26 times more income-deprived than the average in the rest of England. The local authority area ranked 95th out of 317 local authorities in 2019, placing it within the 30% most income-deprived local authorities in England.
- Hillingdon is on average less income-deprived in comparison to London, with a relative deprivation ratio of 0.85, although the local authority is 1.12 times more income-deprived than the average in the rest of England. The local authority area ranked 151st out of 317 local authorities in 2019, placing it within the 47% 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 0.5, and also less income-deprived (0.66) than the average in the rest of England. The local authority area ranked 297th out of 317 local authorities in 2019, placing it within the 10% 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 [\[See reference 87\]](#). 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 [\[See reference 88\]](#).

## Equalities

**C.68** 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.69** Data regarding the population groups including these protected characteristics is collected through the 2021 UK Census [\[See reference 89\]](#). 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.70** 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), London's total economic output was worth around £364 billion in 2014, 6.8% higher than in 2013. In 2014, London accounted for 22.5% of the UK's total GVA, up from 18.9% in 1997 [\[See reference 90\]](#).

**C.71** 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 [\[See reference 91\]](#).

**C.72** Between 1971 and 2015, the total number of jobs in London has increased by almost one million. The professional, scientific and technical activities sector accounts for the largest number of jobs, at 755,000 (or 14%). 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 £68.7 billion of GVA and accounting for 18.9% 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 66.6% of total output in the City of London; whereas Hillingdon has the greatest proportional share of the distribution, transport, accommodation and food sector, accounting for 39.7% of output. Brent has the greatest proportional share of the production industries, accounting for 13.4% of total output. Harrow has the greatest proportional share of local authority output, construction, accounting for 8.3% within London [\[See reference 92\]](#).

**C.73** In Brent, Harrow, Hillingdon and Hounslow, the largest percentage of residents aged 16 and over (28.1, 30.7, 38.8, and 24.9% respectively) are employed in the public administration, education and health sector. In Ealing and Richmond upon Thames, the largest employment sector is banking, finance and insurance, employing 35.7% and 32% respectively [\[See reference 93\]](#). In the OPDC area, the most prevalent occupational group is professional occupations (24%) [\[See reference 94\]](#). 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 [\[See reference 95\]](#). It is uncertain how much the waste management sector contributes to employment within West London.

**C.74** Across London in the year ending December 2023, 74.6% of people aged 16 to 64 years were employed. This means that Harrow, Hillingdon, Brent, and OPDC are below the London average, with 73.4%, 68.2%, 67.7%, and 61% respectively while Hounslow, Ealing, Richmond upon Thames are above the London average, with 81.2%, 79.4%, and 78.5% respectively. Across London in the year ending December 2023, 5% of people aged 16 to 64 years were unemployed. This means that Hillingdon (7%), Brent (5.7%) and OPDC (6.3%) have a higher unemployment rate than the London average. Harrow (4.7%), Richmond upon Thames (4.5%), Ealing (4.9%) and Hounslow (4.4%) all have lower unemployment rates than the London average [\[See reference 96\]](#) [\[See reference 97\]](#).

## Growth Areas

**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 [\[See reference 98\]](#). The Brent Local Plan (2019) which was adopted in February 2022 [\[See reference 99\]](#) 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 [\[See reference 100\]](#). 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 [\[See reference 101\]](#) 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 [\[See reference 102\]](#) 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' [\[See reference 103\]](#) setting out the Borough's aspirations for Hounslow, Chiswick, Brentford and Feltham. The Hounslow Local Plan 2015-2030 [\[See reference 104\]](#) 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 Regulation 19 Local Plan (2023) [See reference 105] 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 106]. 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 107] 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 [See reference 108] 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. [\[See reference 109\]](#)
- **Harrow:** The Draft Long Term Transport Strategy [\[See reference 110\]](#) 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) [\[See reference 111\]](#) 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) [\[See reference 112\]](#) 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 [\[See reference 113\]](#) 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 (2016) [\[See reference 114\]](#) has three main interrelated tenets to 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%). [\[See reference 115\]](#). 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 [\[See reference 116\]](#) 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 2024, there are 81 heritage assets registered as at risk within wider London. There are ten heritage

assets registered at risk within Brent, 16 within Ealing and Harrow respectively, 31 in Hounslow, 50 in Hillingdon, 17 in Richmond upon Thames, and none 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 [\[See reference 117\]](#) 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 ten buildings on the Buildings at Risk Register, of which three are churches [\[See reference 118\]](#).
- There are four Archaeological Priority Areas and 40 Sites of Archaeological Importance in Brent. [\[See reference 119\]](#).

## 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 [\[See reference 120\]](#). 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 [\[See reference 121\]](#).
- 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 [\[See reference 122\]](#). 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 'Very 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 [\[See reference 123\]](#).

## Harrow

**C.94** The Regulation 19 Submission Local Plan for Harrow 2021 – 2041 looks to integrate heritage growth to ensure that development respects and enhances historic character [\[See reference 124\]](#). 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 [\[See reference 125\]](#).

## Hounslow

**C.95** The Regulation 19 proposed submission of the Hounslow Local Plan 2020 – 2041 [See reference 126] 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 127] 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 [\[See reference 128\]](#).

## Richmond upon Thames

**C.97** The Regulation 19 Submission Local Plan for Richmond upon Thames [\[See reference 129\]](#) 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 [\[See reference 130\]](#).
- 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 [\[See reference 131\]](#).

## Old Oak and Park Royal Development Corporation

**C.98** The Old Oak and Park Royal Development Corporation Local Plan [\[See reference 132\]](#) 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 [\[See reference 133\]](#):

- 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 27<sup>th</sup> February 2017 the OPDC designated the Cumberland Park Factory Conservation Area on Scrubs Lane [\[See reference 134\]](#).

**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 20<sup>th</sup> January 2020, OPDC adopted its Local Heritage Listings which identified 64 non-designated heritage assets [\[See reference 135\]](#).

**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 [\[See reference 136\]](#). 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 [\[See reference 137\]](#).

**C.105** The Northern Thames Basin area is a diverse mix of urban and rural landscapes. The rural and dispersed landscape adjacent to Essex becomes increasingly urban towards the centre of London. There is a mix of historic settlement patterns, with remnants of historical orchards and other communal green and farmed spaces. Urban areas have low levels of tranquillity with pockets of perceived tranquillity. Moving westwards in the WLWP area, the landscape transitions to a more varied mix of suburban and rural areas. As it extends further, the built environment gradually gives way to larger green spaces, farmland, and historic market towns. Furthermore, tranquillity increases as green space and Green Belt areas increase.

**C.106** The Thames Valley area is mainly a low-lying area, widening from Reading, which includes Slough, Windsor, the Colne Valley and the southwest London fringes. The River Thames provides a unifying feature through a very diverse landscape of

urban and suburban settlements, infrastructure networks, fragmented agricultural land, historic parks, commons, woodland, reservoirs and extensive minerals workings. Towards London in the east, urban influences increasingly dominate the landscape, replacing the natural character of the area. This includes a dense network of roads (including the M25 corridor), Heathrow Airport, railway lines, golf courses, pylon lines, reservoirs, extensive mineral extraction and numerous flooded gravel pits. To the south, the open Thames flood plain dominates, with its associated flat grazing land, becoming characterised by a number of formal historic landscapes on higher ground. Between Hampton and Kew, the River Thames forms the focus of a series of designed landscapes.

**C.107** Within the **Northern Thames Basin NCA**, drivers for change include:

- Continued urban expansion of settlements putting pressure on their landscape setting;
- Provision of new open space to improve health and wellbeing, which could lead to habitat fragmentation and an altered landscape character;
- Increased development of infrastructure (transport, logistics and industrial);
- Continued demand for minerals;
- Climate change will lead to increased wind erosion in hotter and drier periods and water erosion in the wetter, colder periods;
- Loss of brownfield sites in developed areas putting pressure on invertebrate habitats; and
- Decreased water availability with potential loss of specific drought intolerant species and water quality of water bodies.

**C.108** Within the **Thames Valley NCA**, drivers for change include:

- Climate change will lead to increased wind erosion in hotter and drier periods and water erosion in the wetter, colder periods;
- The Thames Barrier is currently effective but may become unsustainable. Climate change could increase peak river flows by 20% and fluvial flows at Teddington by up to 40% by 2080;
- Drier summers and increasing temperatures, in relation to climate change, could lead to deterioration in the area's semi-natural wetland habitats, including ancient wet meadows and could also lead to lower river flows and increased demand for water resources;



- Continued urban expansion of settlements putting pressure on their landscape setting;
- Designed parkland features at risk from changing agricultural activities, development pressure and lack of management for individual trees;
- Increased development of infrastructure (transport, logistics and industrial) contributing to the overall fragmentation of the landscape;
- Continued demand for recreation opportunities from those living in the more urban parts of the NCA and Inner London, which could lead to habitat fragmentation and an altered landscape character.

**C.109** The urban landscapes can be conserved by maintaining green spaces, landscaping and trees and implementing good design practices in new developments. Maintaining the rural landscape and natural landforms will be dependent on being able to preserve and conserve ancient woodlands, unimproved grasslands, protected lanes, commons and hedge-rowed field patterns, as well as the ridges and hilltops from inappropriately located or designed development, changing agricultural practices and seasonal climate change.

## Implications for health

**C.110** The landscape can benefit mental health and wellbeing in providing a pleasant setting and identifying and enhancing local landscape contributes to sense of place and belonging. Sensitive landscape management can also improve social and physical health by encouraging physical recreation, including providing a pleasant environment for activities such as walking and cycling, providing good public access links and helping people to feel safe and confident in navigating landscapes.

## Biodiversity and Geodiversity

**C.111** Endangered species and habitats are protected through the compilation and delivery of Biodiversity Action Plans (BAPs) at national, regional and local levels. Priority Habitats and Species are regarded as the most important habitats and species that need to be conserved across the country.

**C.112** At UK level, the publication of the State of Nature Report [\[See reference 138\]](#) 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 13% decline in the average abundance of wildlife in the UK since the 1970s, with key drivers for change



being agricultural productivity, climate change and increasing average temperatures, urbanisation 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 [\[See reference 139\]](#). 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 Environment Strategy [\[See reference 140\]](#) 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 [\[See reference 141\]](#));
- 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.115** 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.116** 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.117** 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 [\[See reference 142\]](#). The SSSI is currently assessed as being in a favourable condition. There are also three Local Nature Reserves including Fryent Country Park. [\[See reference 143\]](#).

## Ealing

**C.118** 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.119** 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 [\[See reference 144\]](#).

**C.120** 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 [\[See reference 145\]](#).

## Harrow

**C.121** 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 [\[See reference 146\]](#):

- Bentley Priory (59.25 ha)
- Stanmore Common (49.2 ha)
- Stanmore Country Park (30.75 ha)
- Roxbourne Rough (5.2 ha)

## Hounslow

**C.122** Hounslow's Nature Recovery Action Plan (NRAP) 2023 – 2028 [\[See reference 147\]](#) 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.123** 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.

**C.124** There are 10 LNRs in Hounslow, totalling 163ha. The network of SINCs spans the borough but trends toward the habitats associated with the Thames, Crane and Brent corridors, the western boundary (including Bedfont Lakes to Kempton Park), around Osterley Park in the north and Syon Park in the south. There is a total of 74 SINC sites in Hounslow.

## Hillingdon

**C.125** Hillingdon is one of the most biodiverse boroughs in London. The borough has a diverse range of habitats, including woodlands, scrublands, grasslands, wetlands, rivers, gardens, and parklands. These varied environments support a vast range of species, both common and protected. Hillingdon has six SSSIs, of which two are in unfavourable condition. These are Fray's Farm Meadows SSSI, and Harefield Pit SSSI [\[See reference 148\]](#). 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 [\[See reference 149\]](#).

## 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 [\[See reference 150\]](#).

**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 23 SINC's of local importance [\[See reference 151\]](#). The emerging Local Plan is taking forward the recommendations from the Review of Sites of Importance for Nature Conservation (2021 and 2022), which includes new SINC's, expansion areas or removing areas from existing SINC's, and changing the SINC status, as well as amalgamating and renaming 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 [\[See reference 152\]](#).

## Old Oak and Park Royal Development Corporation (OPDC)

**C.131** SINC's within the OPDC area are designated under the OPDC Local Plan [\[See reference 153\]](#). 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 [\[See reference 154\]](#).

**C.132** OPDC has recently delivered biodiversity improvements along the Grand Union Canal. This includes towpath clean ups, planting events, and maintenance events [\[See reference 155\]](#).

## 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' [\[See reference 156\]](#) 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 [\[See reference 157\]](#) 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 [\[See reference 158\]](#). 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 [\[See reference 159\]](#) 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 [\[See reference 160\]](#). 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 [\[See reference 161\]](#). 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 [\[See reference 162\]](#) [\[See reference 163\]](#).

**C.142** Under predicted climate change scenarios, more frequent drought conditions are expected in London and the South East of England, along with increased demands on water resources. The combination of limited water resources and high demand has resulted in the Environment Agency designating the Thames Water region to be 'seriously' water stressed, meaning that more water is taken from the environment than the environment can sustain in the long term. Future developments will create additional demand for water abstraction from surface and groundwater sources in London. At a high level, it is broadly assumed that the quality of water bodies will improve in line with national objectives. However, water quality is influenced by a wide range of internal and external factors, including climate change, geology and soils, human consumption and population change, and pollution from human activities such as industry, agriculture, contaminated runoff from roads and other built surfaces, combined sewer overflows, and nutrient enrichment from treated wastewater.

## Air and noise pollution

**C.143** Human health, quality of life and the environment can all be negatively affected by air and noise pollution. The London Boroughs of Brent, Ealing, Harrow, Hounslow, and Richmond upon Thames have designated Air Quality Management Areas (AQMAs) covering their entire boroughs, while the Hillingdon AQMA covers approximately three-quarters of the borough. The OPDC area spans parts of Brent, Ealing, and Hammersmith & Fulham, all of which have borough-wide AQMAs.

**C.144** Transport is the primary source of NO<sub>2</sub> and PM<sub>2.5</sub> pollution in the local authorities' areas, with Heathrow Airport notably contributing to emissions in Hillingdon and Hounslow [\[See reference 164\]](#).

**C.145** Air quality data for London shows that 2016 monitoring sites in London recorded over 4,000 hours above the safe threshold for NO<sub>2</sub>. In 2023, this reduced to just 22 hours, a reduction of 99% in the number of hours when NO<sub>2</sub> 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 2023,



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<sub>x</sub>, PM<sub>2.5</sub>, and CO<sub>2</sub> has reduced. Specifically, ULEZ policies were estimated to have reduced nitrogen oxides (NO<sub>x</sub>) emissions from road traffic by 13,500 tonnes in London between 2019 and 2022 [See reference 165]. The ULEZ covers all London boroughs, except for the area of the M25, and applies to all cars, motorcycles, vans and specialist vehicles (up to and including 3.5 tonnes) and minibuses (up to and including 5 tonnes). The Mayor of London also designated a Low Emission Zone (LEZ), which covers all roads within Greater London, those at Heathrow and parts of the M1 and M4 are included, except the M25 (even where it passes within the GLA boundary). The LEZ is designed to target pollution from the heaviest polluting heavy diesel vehicles.

**C.146** The WLWP boroughs declared AQMA for the following pollutants:

- Brent AQMA declared in 2006 for Nitrogen dioxide NO<sub>2</sub> and Particulate Matter PM<sub>10</sub>
- Ealing AQMA declared in 2000 for Nitrogen dioxide NO<sub>2</sub> and Particulate Matter PM<sub>10</sub>
- Harrow AQMA declared in 2002 for Nitrogen dioxide NO<sub>2</sub> and Particulate Matter PM<sub>10</sub>
- Hounslow AQMA declared in 2006 for Nitrogen dioxide NO<sub>2</sub>
- Hillingdon AQMA declared in 2003 for Nitrogen dioxide NO<sub>2</sub>
- Richmond upon Thames AQMA declared in 2000 for Nitrogen dioxide NO<sub>2</sub> and Particulate Matter PM<sub>10</sub>

**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.

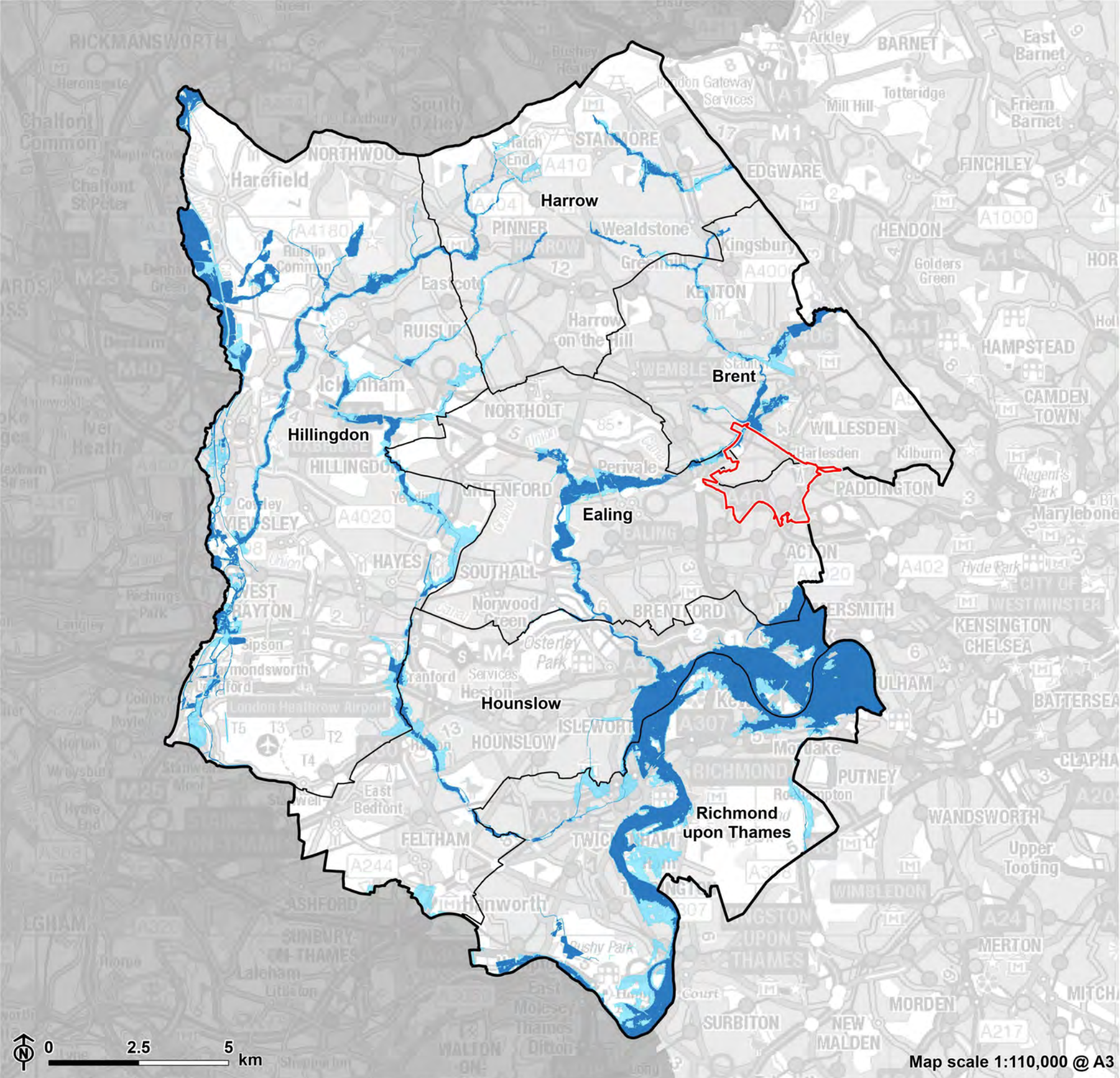
**C.149** London and the South East of England is one of the driest areas of the country and thus faces ongoing water resource challenges, growing demand, and uncertainty from climate change. In addition, poor water quality can increase the risk of water-borne disease.





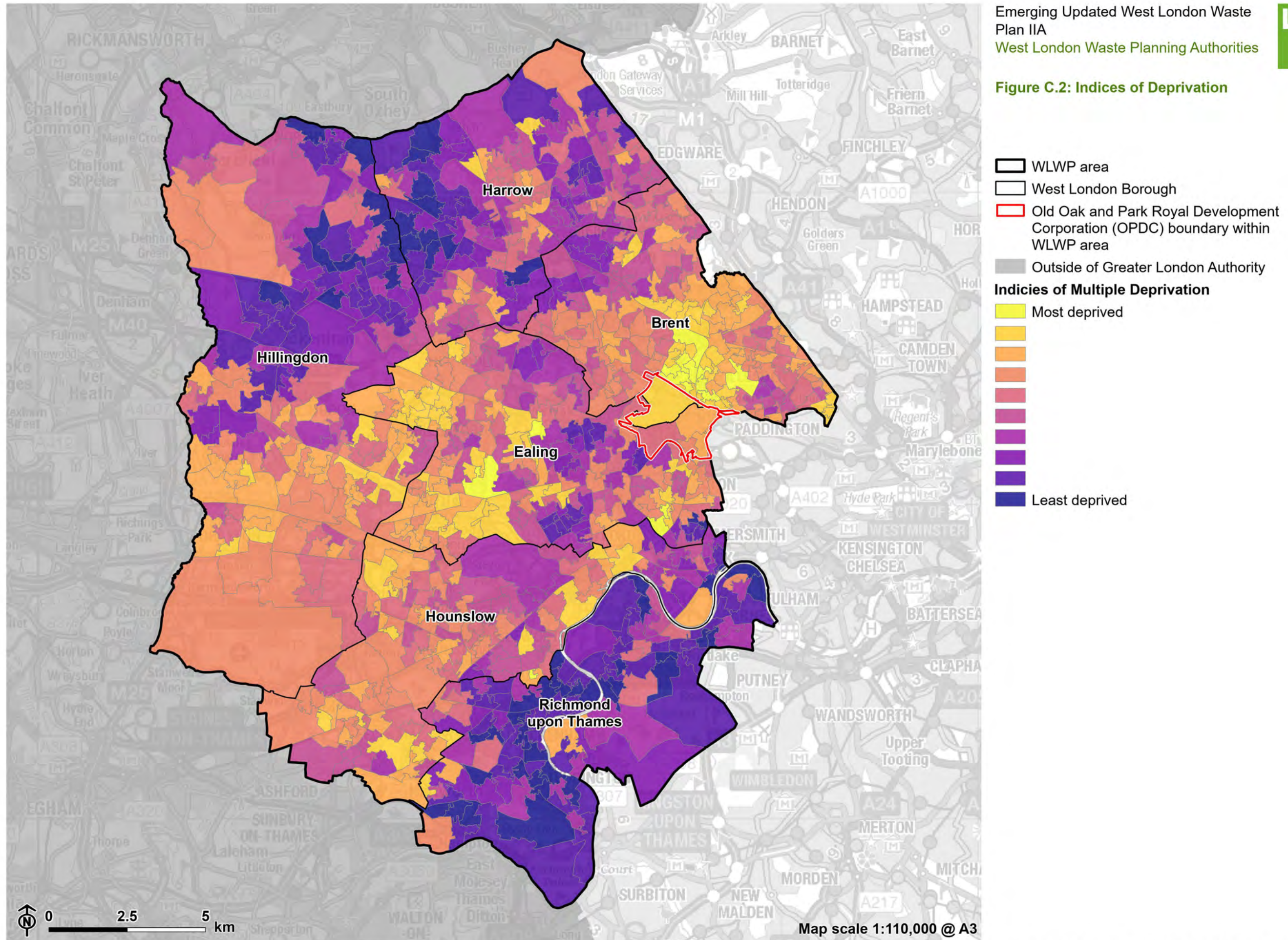
Figure C.1: Flood Risk

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



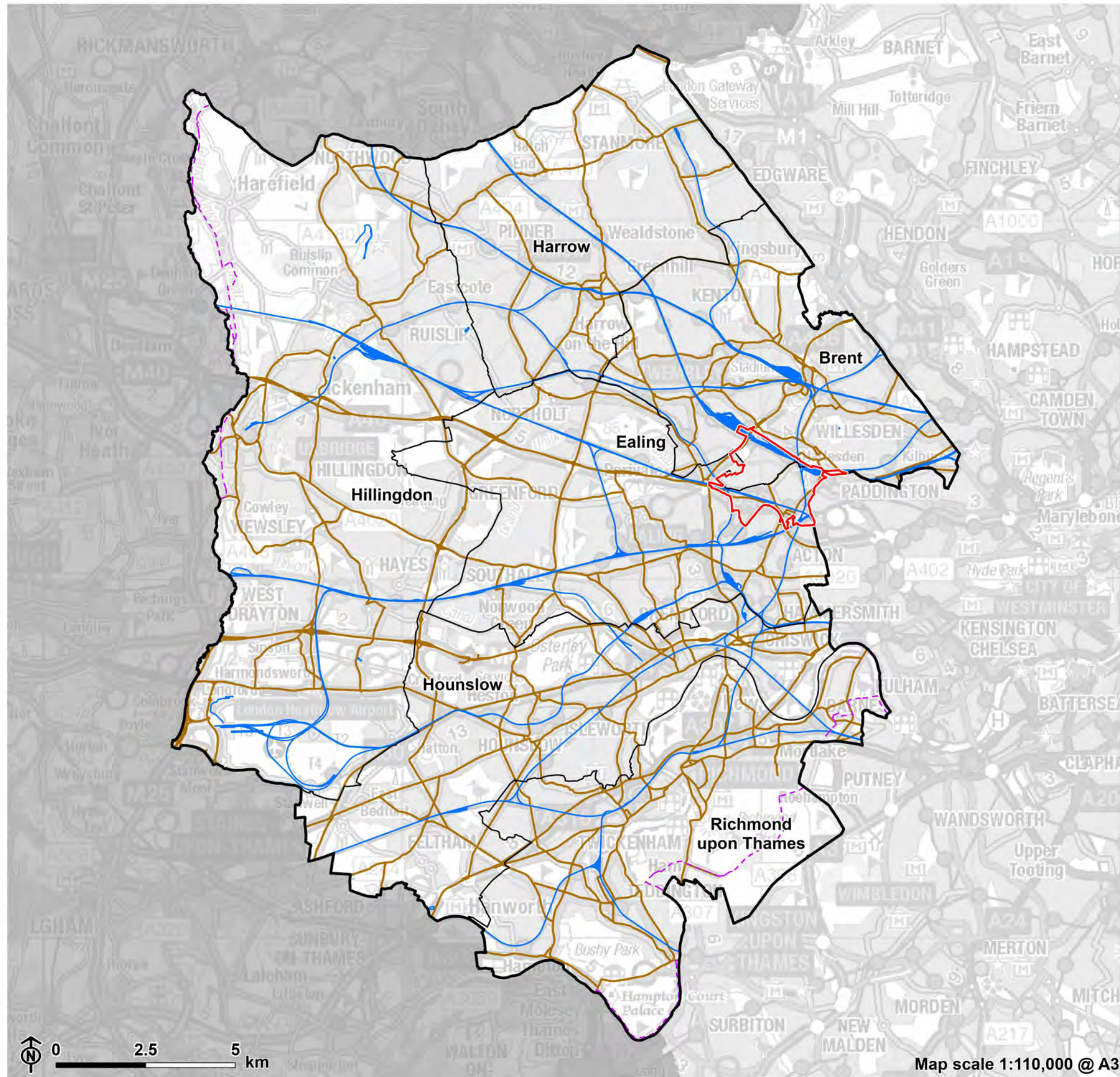


**Figure C.2: Indices of Deprivation**





**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
- National Cycle Network
- Major road
- Railway



Figure C.4: Open Space

- Study area
- West London Borough
- Outside of Greater London Authority
- Green Belt
- Greenspace

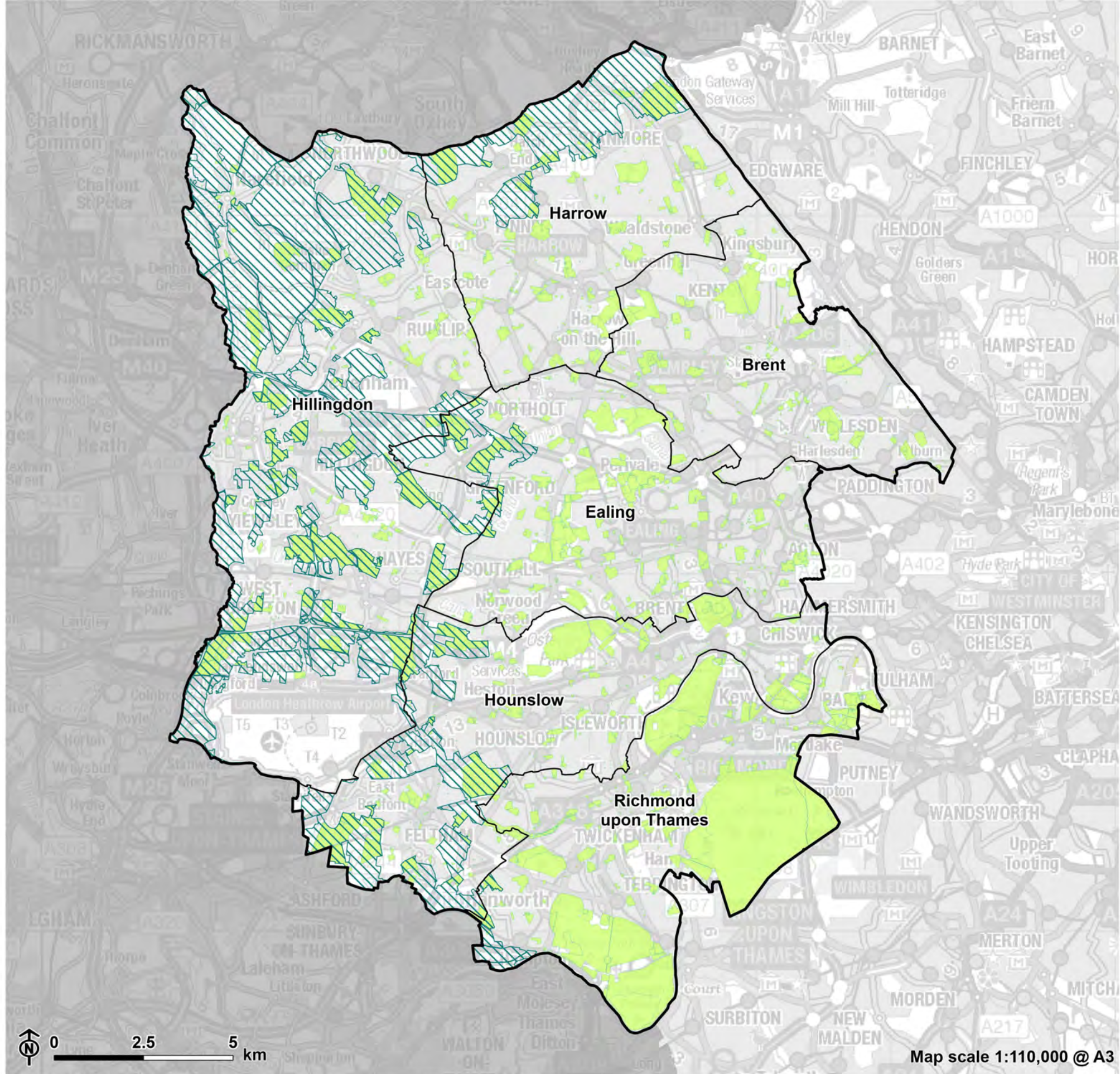




Figure C.4a: Historic Environment - Brent

- 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  
Conservation Area extension  
Registered Parks and Gardens  
**Listed building**  
Grade I  
Grade II\*  
Grade II

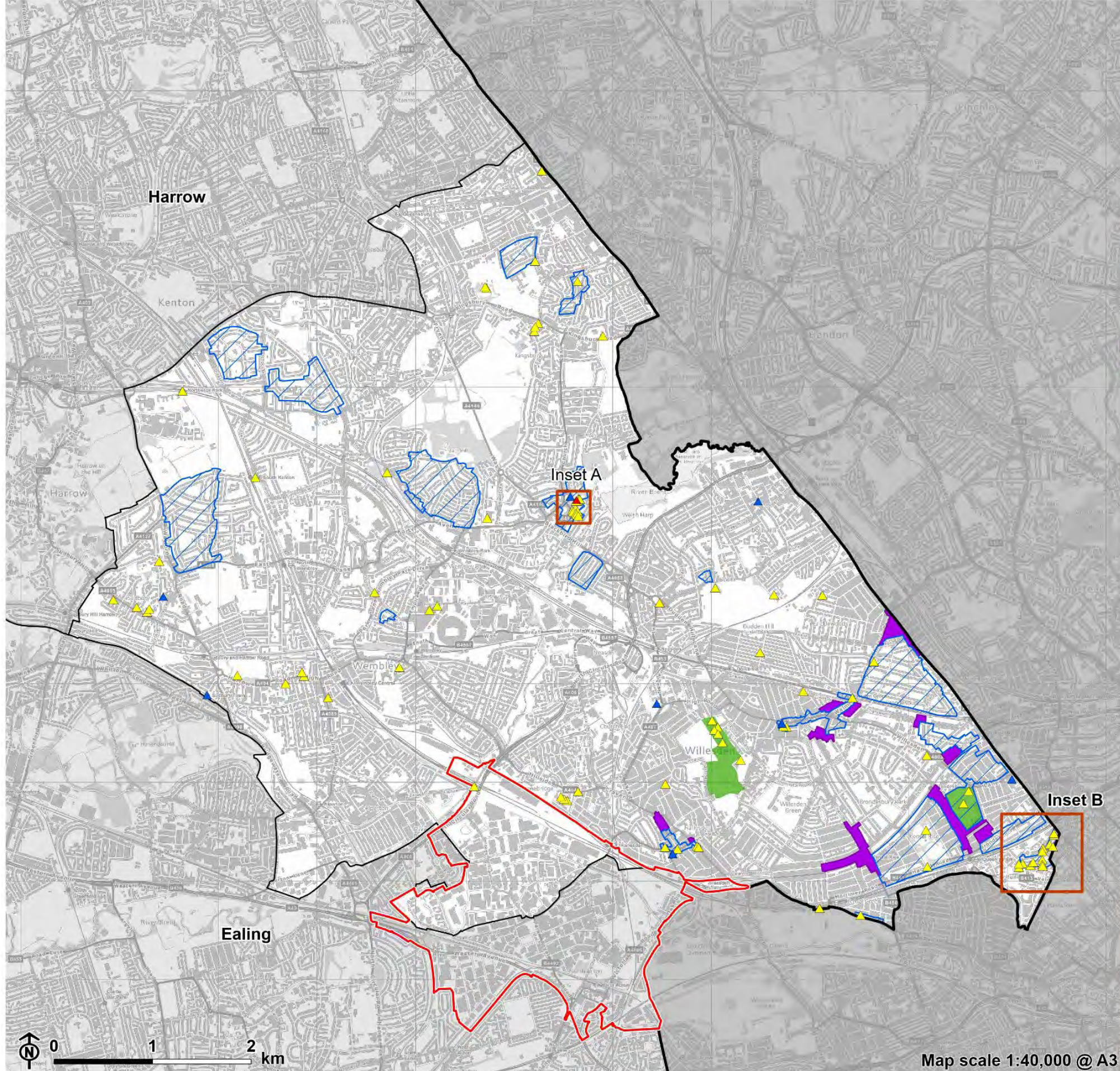
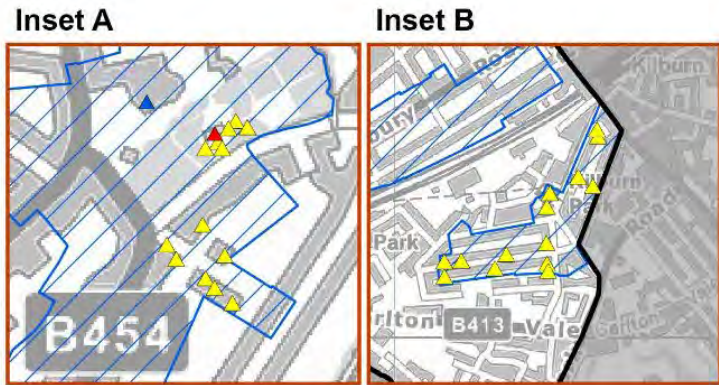




Figure C.4b: Historic Environment - Ealing

- 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

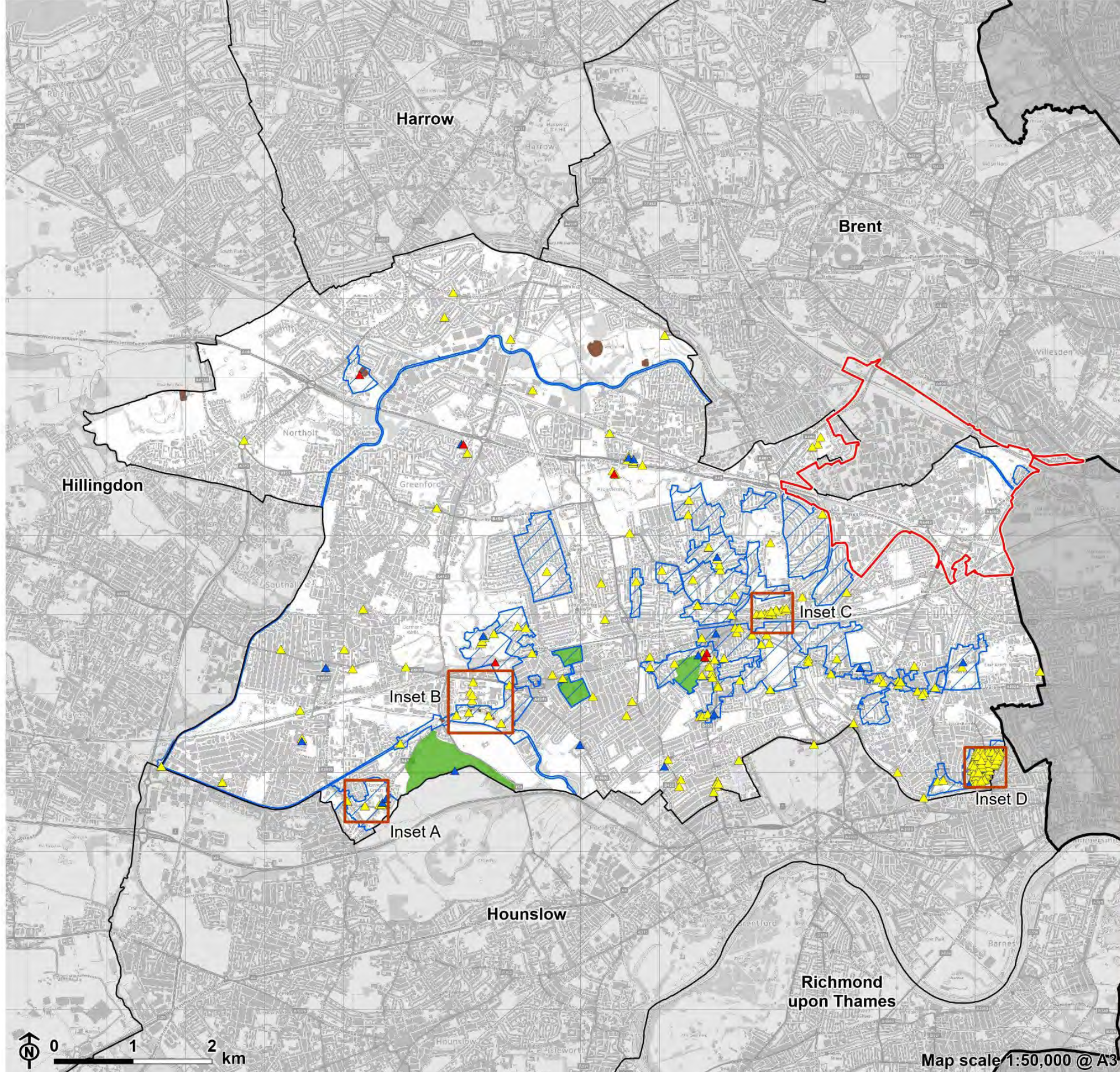
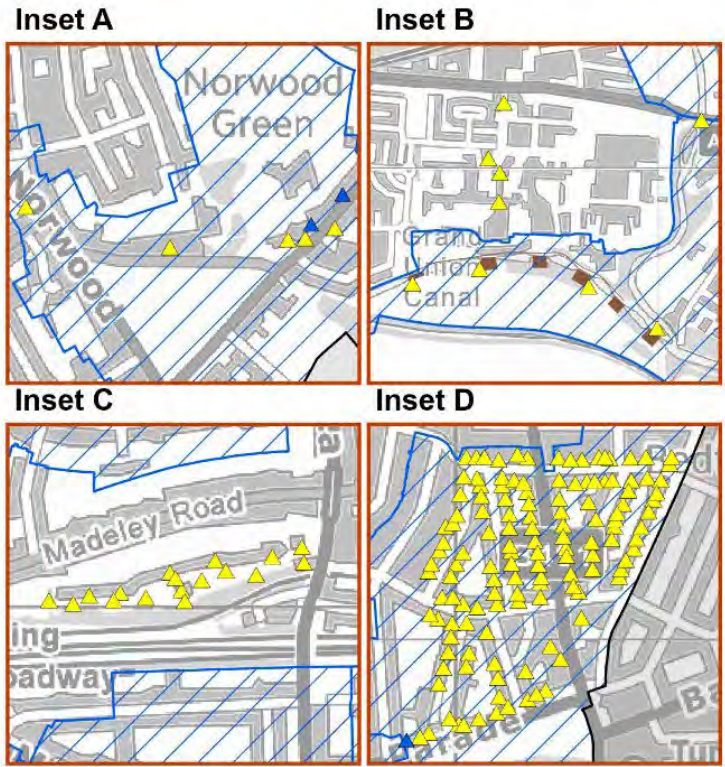




Figure C.4c: Historic Environment - Harrow

- 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

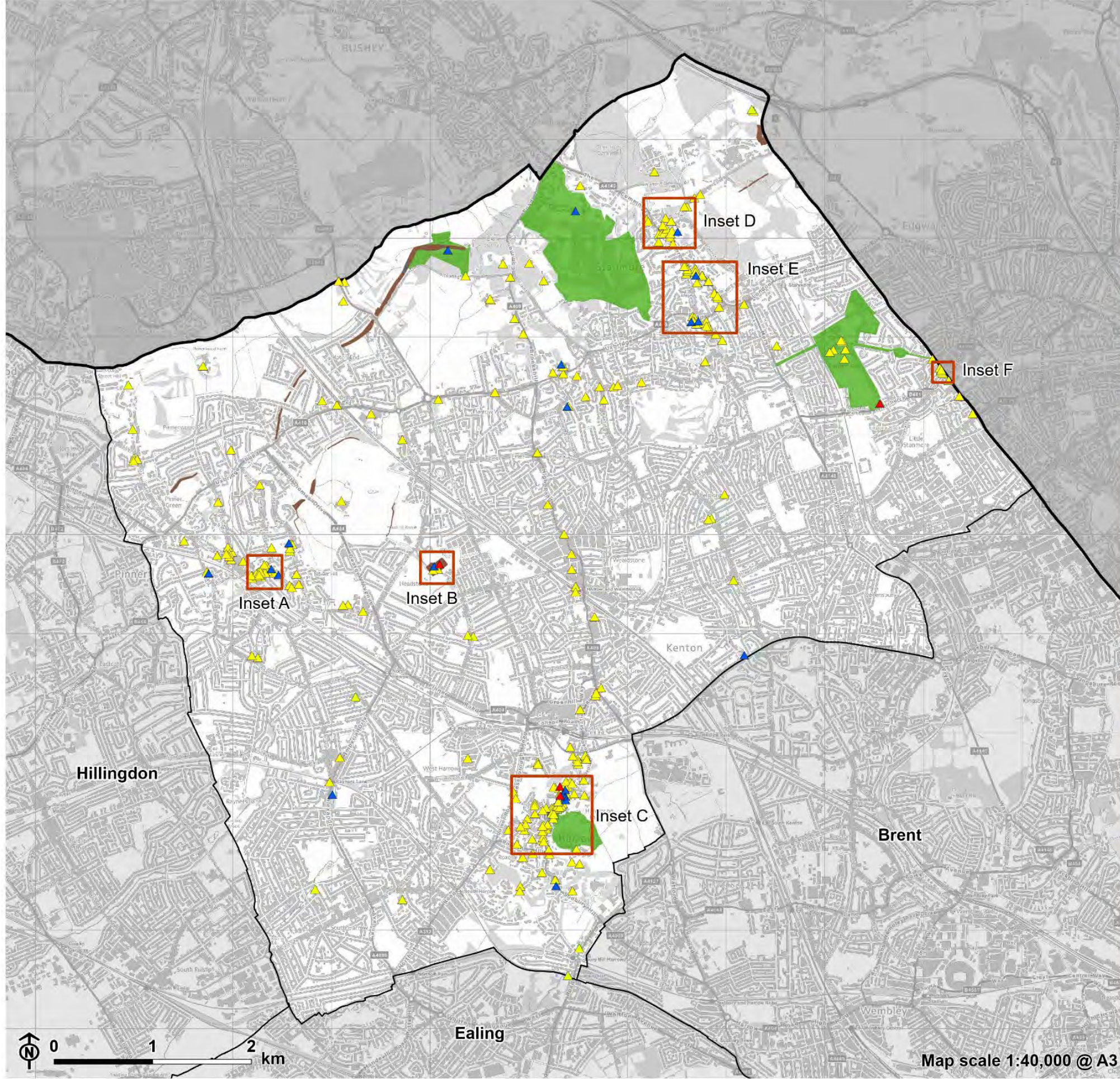
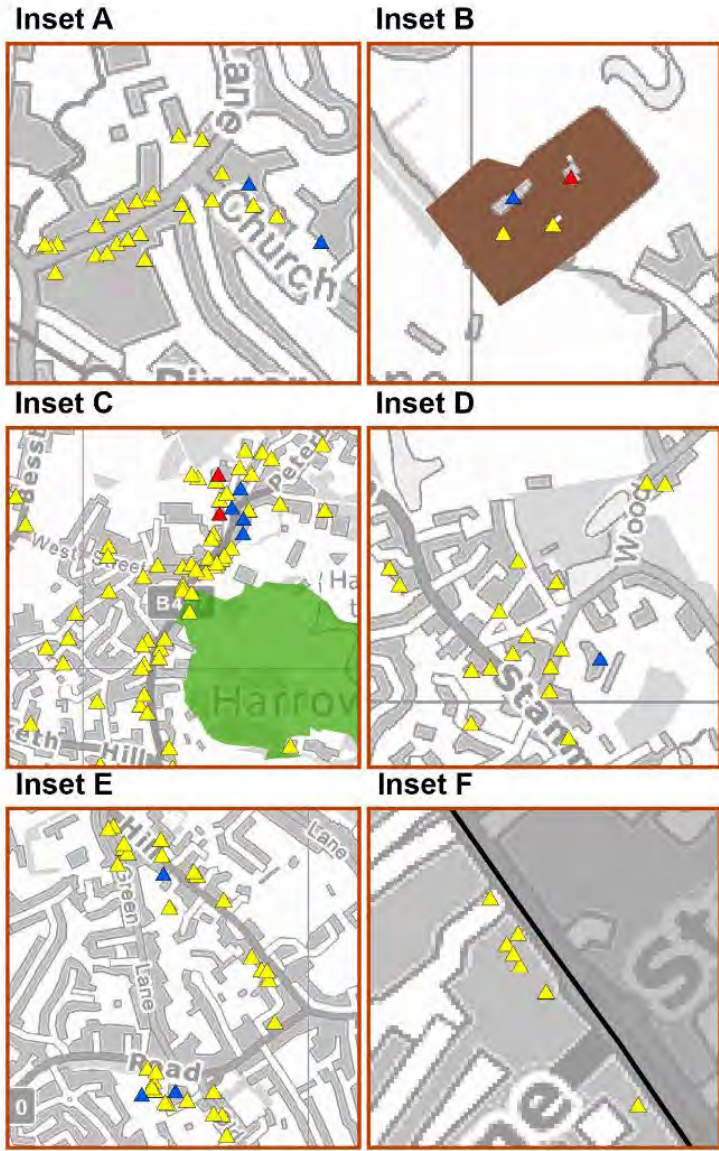




Figure C.4d: Historic Environment - Hillingdon

- 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

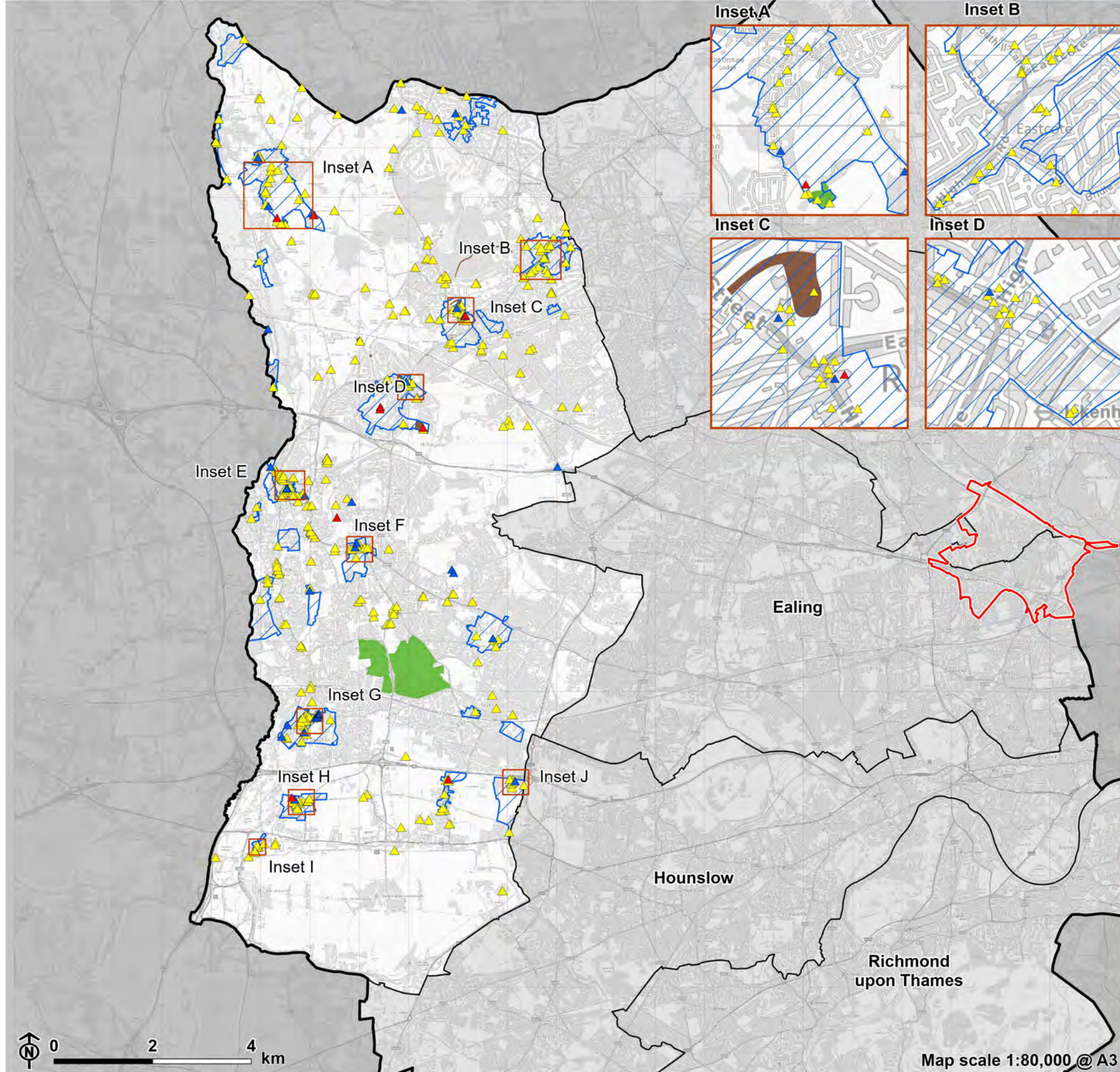
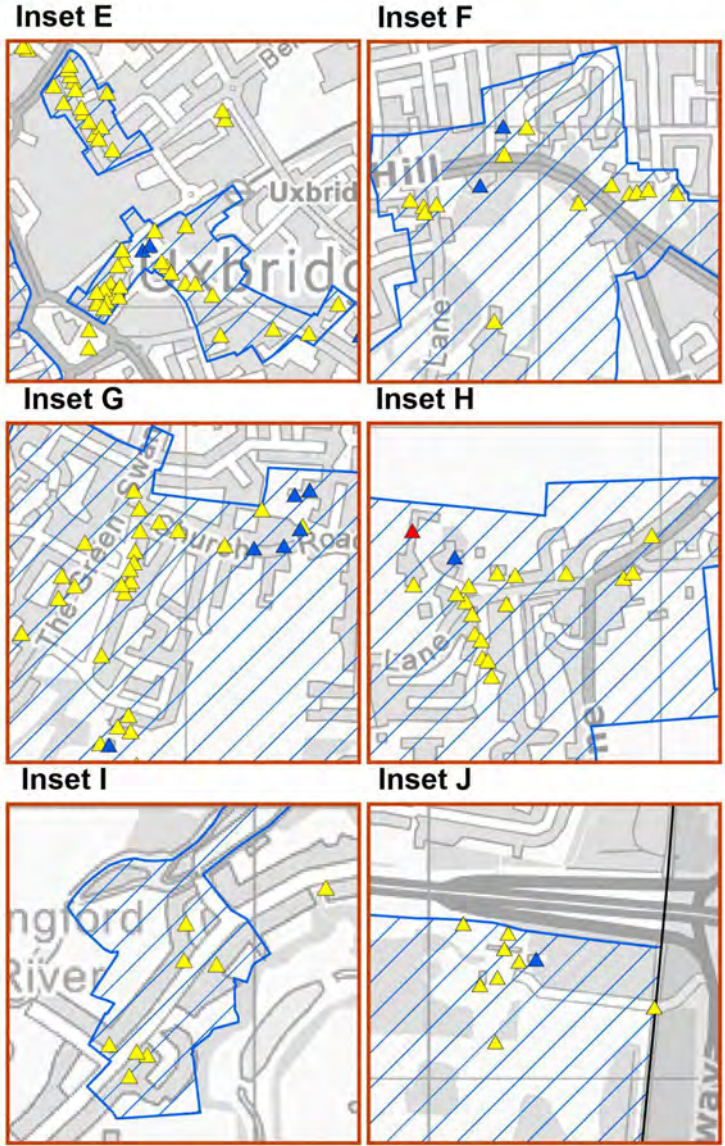
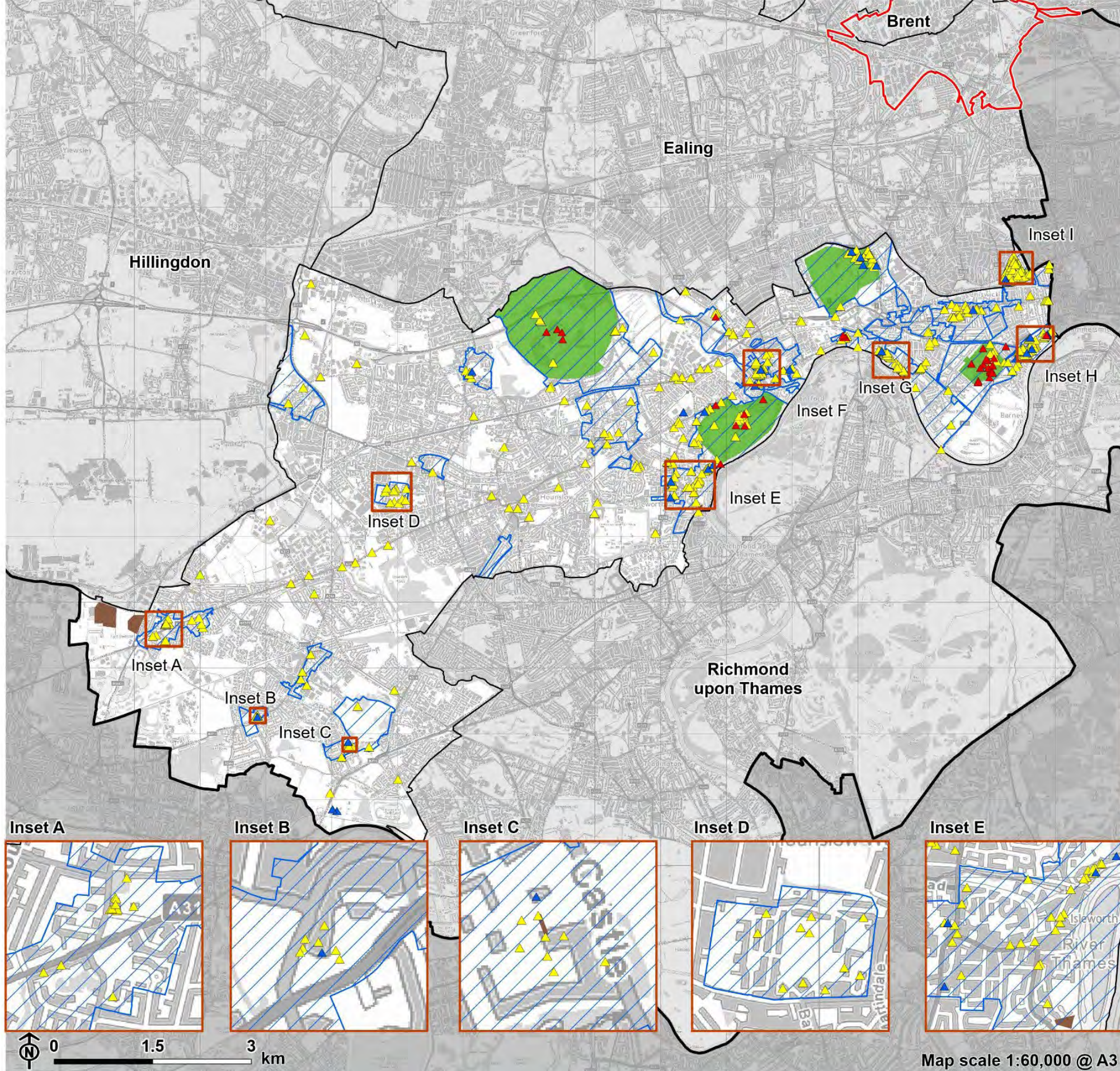


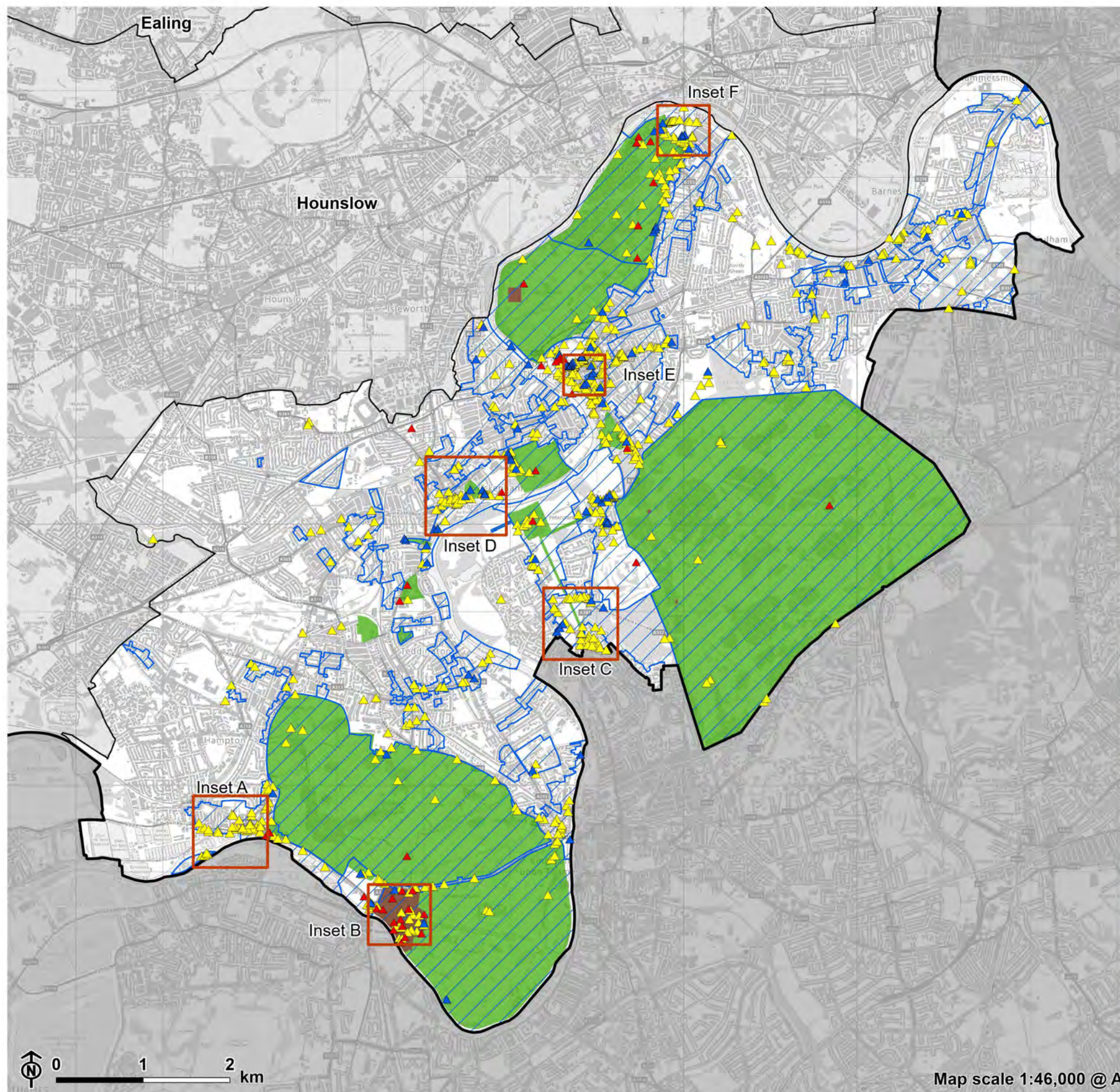


Figure C.4e: Historic Environment - Hounslow

- 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

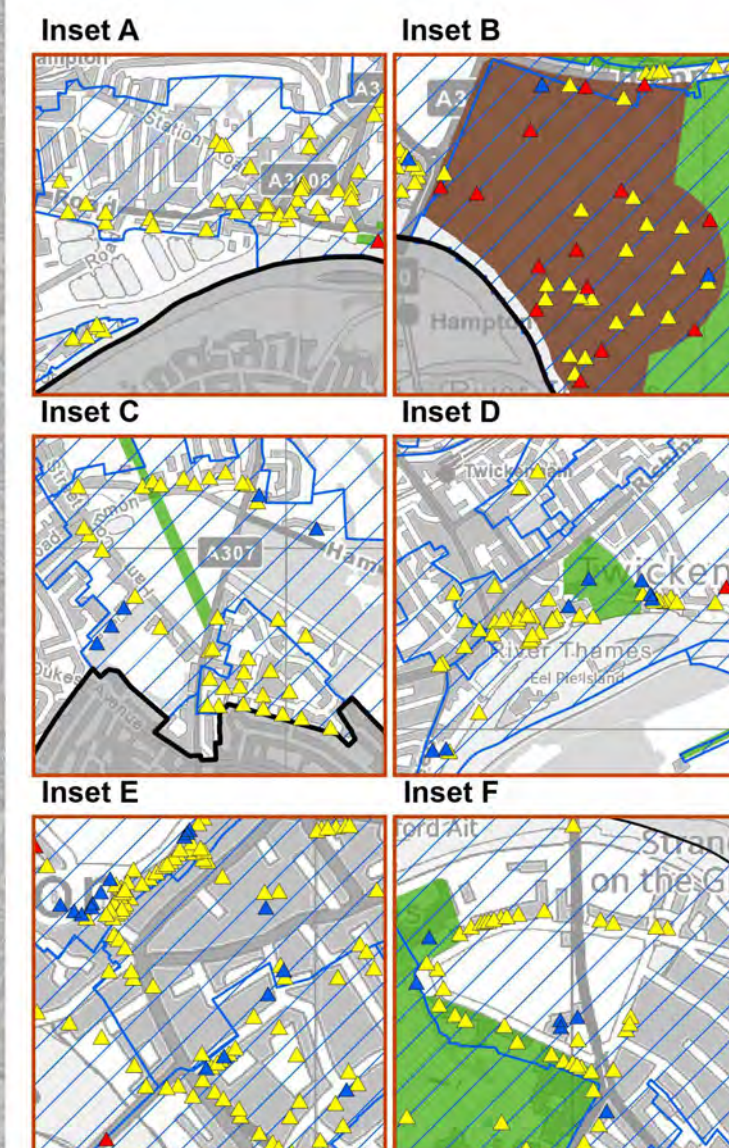




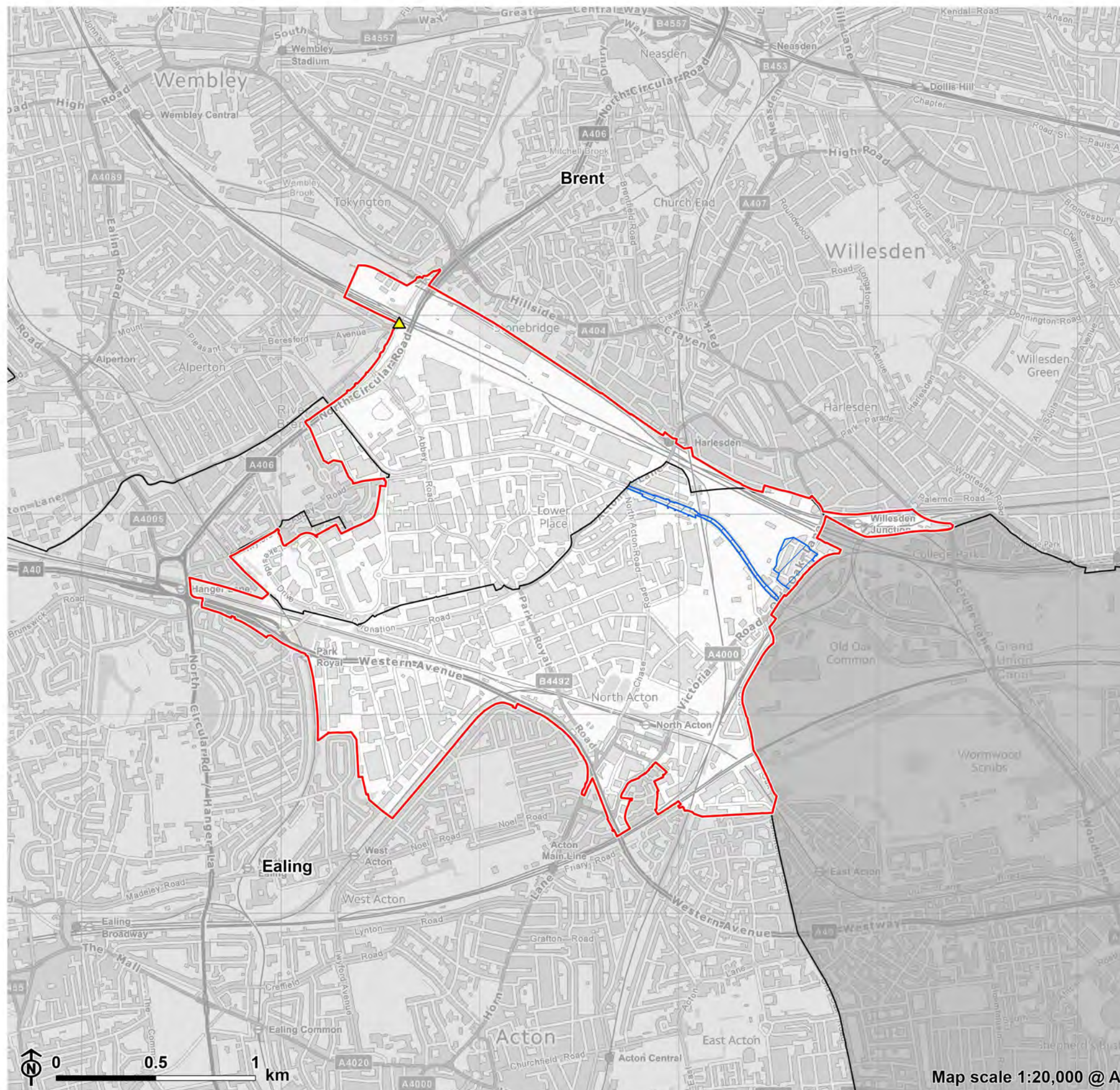


**Figure C.4f: Historic Environment - Richmond upon Thames**

- 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





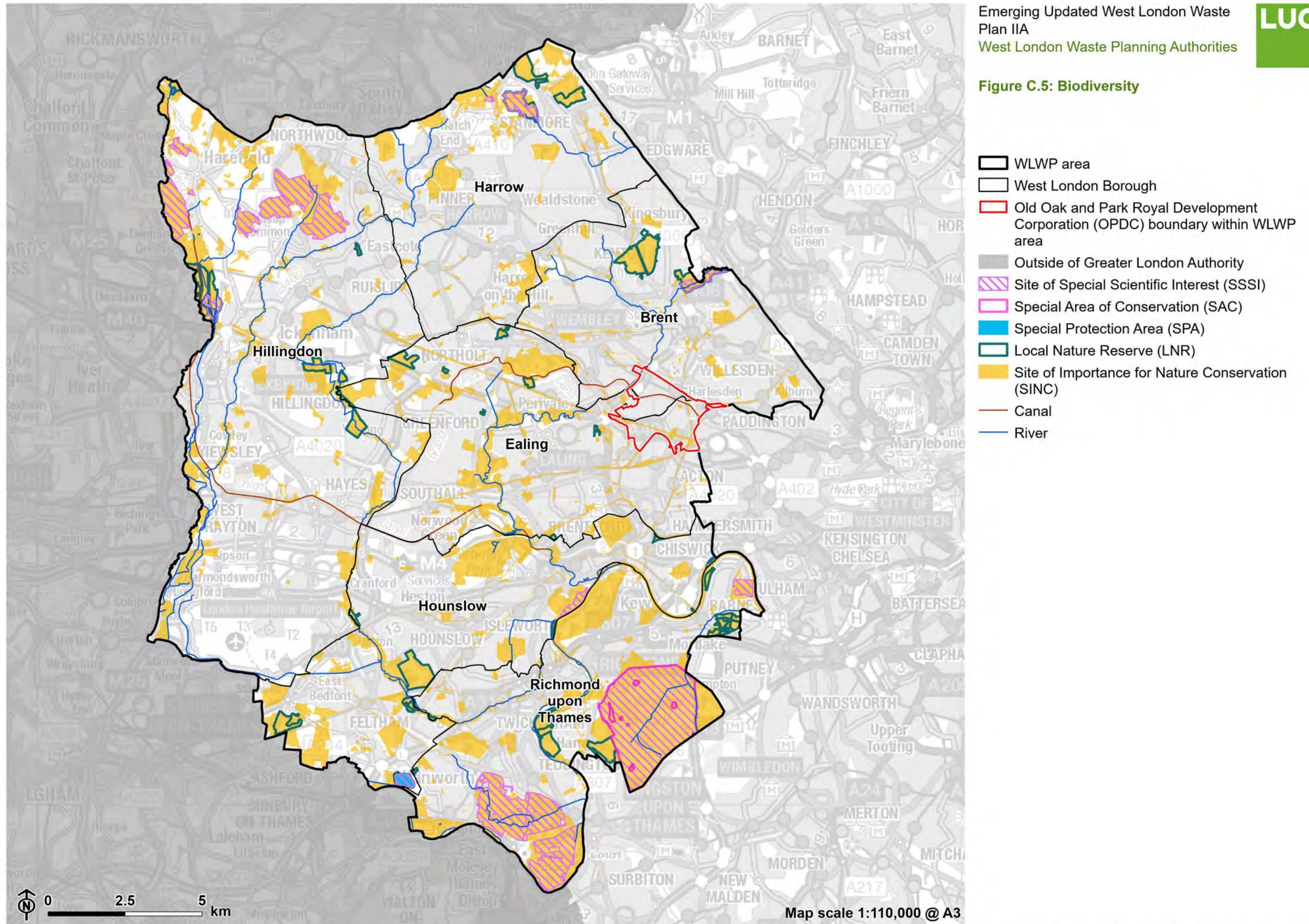


**Figure C.4g: Historic Environment - Old Oak and Park Royal Development Corporation (OPDC)**

- 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**





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