Appendix C

Regulation 18
Draft Updated West London Waste Plan

LPA Member Sign Off

October 2025

Logos

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Abbreviations

AMR	Authority Monitoring Report
BAP	Biodiversity Action Plans
CCC	Climate Change Committee
CCS	Carbon Capture and Storage
CE	Circular Economy
C, D & E	Construction, Demolition and Excavation
C&I	Commercial and Industrial
HRA	Habitats Regulation Assessment
LACW	Local Authority Collected Waste
LNR	Local Nature Reserve
Mtpa	Million tonnes per annum
MBT	Mechanical Biological Treatment
NPPF	National Planning Policy Framework
OPDC	Old Oak & Park Royal Development Corporation
OS	Ordnance Survey
RBMP	River Basin Management Plan
RDF	Refuse Derived Fuel
RWS	Resources and Waste Strategy
SIL	Strategic Industrial Location
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
tpa	Tonnes per annum
WDI	Waste Data Interrogator
WLLPAs	West London Local Planning Authorities
WLWA	West London Waste Authority
WLWP	West London Waste Plan
WLWP 2015	West London Waste Plan 2015
WPA	Waste Planning Authority

1 Executive Summary

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

1.2 In west London, the adopted waste local plan, known as the 'West London Waste Plan 2015' (WLWP 2015), was adopted in 2015. It plans for the management of waste through to 2031 within the following London boroughs: Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames. Those parts of the boroughs of Brent and Ealing that fall under the planning jurisdiction of the Old Oak & Park Royal Development Corporation (OPDC) are also included. Together these seven local planning authorities are referred to as the West London Local Planning Authorities (WLLPAs).

1.3 Since 2015, both planning policy and the national waste management policy has changed. New waste management technologies, collection methods and understanding of the impacts of different approaches have also improved. Because of this, the WLLPAs decided to update the WLWP.

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

1.5 This document is the draft version of the updated WLWP published for public consultation. Once adopted, the WLWP will replace the WLWP 2015 and form part of each authority's wider development plan. It will sit alongside their adopted Local Plans, the London Plan and any relevant neighbourhood plan(s). The updated WLWP is designed to support existing planning policies rather than repeat them.

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

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

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

1.8 A recent assessment shows that west London has more than enough capacity for the management of current and forecast future waste arisings, other than for landfill. This includes the amounts of HIC waste apportioned for management by each London Borough through the 2021 London Plan. Therefore, there is no immediate need for more waste management requirements within the Plan area.

1.9 The London Plan is under review. Once the new version is adopted, this updated WLWP may also need to be reviewed to ensure it aligns with it. For now, this draft version is considered to be in general conformity with the requirements of the 2021 London Plan.

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

2 Introduction and background

What is the West London Waste Plan?

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

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

2.3 In West London, the current waste local plan, known as the ‘West London Waste Plan’ (WLWP 2015), was adopted in 2015 and plans for the management of waste over the period until 2031 within the following LPA areas located in west London (‘the WLLPAs’):

a. London Borough of Brent
b. London Borough of Ealing
c. London Borough of Harrow
d. London Borough of Hillingdon
e. London Borough of Hounslow
f. London Borough of Richmond upon Thames
g. plus those parts of Brent and Ealing that fall under the jurisdiction of the Old Oak & Park Royal Development Corporation.

2.4 Once adopted the updated joint West London Waste Plan (WLWP or ‘the Plan’), will replace the adopted 2015 West London Waste Plan taking account of changes in policy and taking the planning horizon forward for another 15 years. The new West London Waste Plan will form part of each authority’s Development Plan.

2.5 A map of the area covered by the Plan (‘the Plan area’) is presented in Figure 1. The other areas of London have either prepared, or are in the process of preparing, their own waste plans and planning policies so the requirements of the London Plan are met.

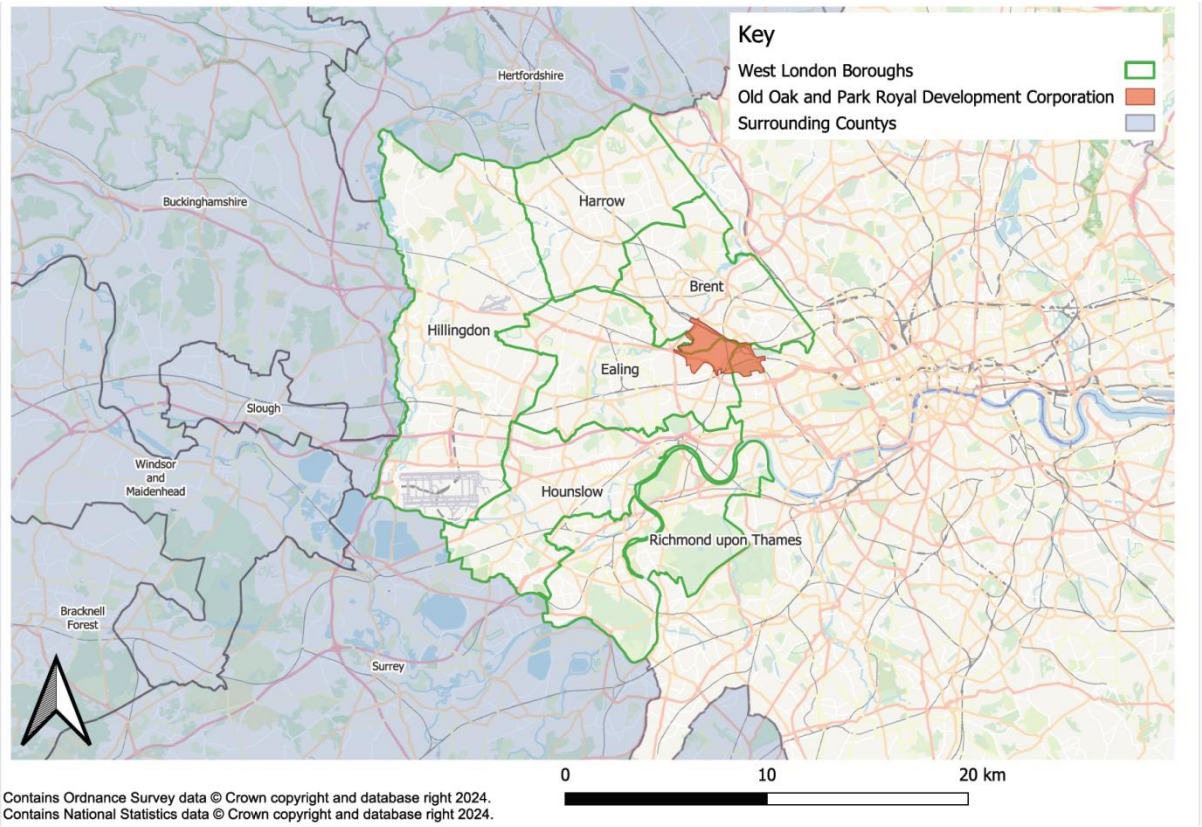

Figure 1: Area Covered by the updated West London Waste Plan ('The Plan Area') and wider context

The need to replace the current waste plan

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

2.7 Since the current plan was adopted in 2015, a number of changes have occurred which include:

a. Changes in the planning policy landscape including:
   i. a new London Plan published in 2021;
   ii. several updates to national planning policy;
   iii. new Local Plans adopted by WLLPAs; and,

b. Changes in the national waste management policy landscape including the introduction of Simpler Recycling requirements and a target to halve residual waste produced in England by 2042.

c. Evolution of waste management technologies, collection methods and better understanding of the impacts of different approaches.

d. Current and emerging local conditions including pressure to release existing waste sites to alternative development, in particular that relating to alleviating the pressures in London for more housing.
e. Changes in patterns of waste production.
f. Emergence of the 'Circular Economy' as a concept to be embedded into planning policy to promote the management of waste in accordance with the waste hierarchy in priority order and thereby driving it up the hierarchy.

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

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

The process of preparing the West London Waste Plan

2.10 The process by which a Local Plan is prepared is prescribed in legislation[1] and policy[2] and Table 1 shows the related various stages with regard to the preparation of the new WLWP. The different stages provide opportunities for residents, businesses and other key stakeholders to comment and be involved in determining the content of the Plan. A 'Consultation Protocol' has been prepared that sets out in more detail how the WLLPAs are seeking to engage with communities and stakeholders during the preparation of the Plan.

[1] Planning and Compulsory Purchase Act 2004 and the Town and Country (Local Planning) (England) Regulations 2012
[2] National Planning Policy Framework, December 2024

Table 1: Anticipated Timetable for Preparation of the West London Waste Plan

Key Stage	Timeline
Draft emerging WLWP – 6/8-week public consultation ('Regulation 18')	End 2025
'Final' Submission WLWP published for representations ('Regulation 19')	Mid 2026
WLWP submitted for independent examination	Late 2026
Examination hearings (if needed)	Early/Mid 2027
Main modifications (if needed) published for representations	Mid 2027
Inspector's Report	Late 2027
Adoption	Late 2027/Early 2028

Key elements of the West London Waste Plan

2.11 The key elements of the emerging updated West London Waste Plan are:

i. Vision
ii. Strategic Objectives
iii. Policies
iv. Policies Map
v. Monitoring Framework

2.12 Together, these elements will set out how and where the WLLPAs intend the management of waste to take place in West London

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

This stage of preparing the WLWP

2.14 Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires the Waste Planning Authority (WPA) to notify and invite representations from key stakeholders and communities on the content of the plan.

2.15 This draft emerging updated WLWP is the first formal opportunity for stakeholders to contribute to the draft emerging updated WLWP. The Topic Papers published alongside this draft emerging Plan explore the issues that affect the delivery of waste management capacity in West London.

2.16 The consultation, on this first draft of the emerging Plan, will run for a minimum period of eight weeks during December 2025 and January 2026. A 'Consultation Protocol' has been prepared that sets out how the WLLPAs are seeking to engage with communities and stakeholders during the preparation of the Plan.[3] Following closure of the consultation period, the WLLPAs will publish a statement summarising the comments received and how each, if necessary, will be addressed in changes to the content of the emerging WLWP.

Supporting documents

2.17 This draft emerging updated WLWP is underpinned by supporting evidence including:

a. Waste Capacity Assessment and Arisings Estimates
b. Strategic Waste Flows Report
c. Existing Safeguarded Sites for Release – Assessment Report
d. Integrated Impact Assessment comprising:
e. Sustainability Appraisal
f. Habitats Regulation Assessment
g. Climate Change Topic Paper
h. Circular Economy Topic Paper
i. Waste Management in West London Topic Paper
j. Strategic Flood Risk Assessment

2.18 The draft emerging WLWP and all evidence base documents can be found on the following website: http://www.wlwp.net/.

[3] See *Consultation Protocol* October 2025. This is based on a distillation of each LPAs' own Statements of Community Involvement.

How to comment on the Regulation 18 Draft WLWP

2.19 A questionnaire has been prepared to help all stakeholders in West London respond to this consultation. The questionnaire is available online and at the Borough's main offices (and certain libraries in some LPA areas). There is also the potential for respondents to raise other issues that they consider the emerging Plan needs to take account of, which may need to be reflected in revisions to this draft emerging updated Plan. This includes inviting stakeholders to nominate sites for waste management facilities, either new or expansion to existing.

2.20 You can respond during the consultation period between December 2025 and January 2026 via the following email address: info@wlwp.net

3 The Plan Context

Spatial Portrait

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

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

3.3 Waste management development is constrained by the presence of residential areas and other sensitive land uses particularly, Green Belt, Metropolitan Open Land (MOL), heritage and conservation designations, ecological protections, and widespread Air Quality Management Areas (AQMAs).

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

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

Local Planning Authority-Level Summaries

London Borough of Brent

3.6 In Brent, Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) in Wembley, Neasden and Alperton currently host waste management facilities. Growth and regeneration across the borough are driving high-density development, which requires integrated waste solutions. Road transport is supported by the A406, A5, and M1 corridors, though congestion is a major challenge. Railheads for materials transportation exist in Wembley and Neasden. Environmental and land-use constraints include AQMA coverage, flood risk along the River Brent, and the protected Welsh Harp Reservoir (SSSI). Brent currently accommodates 13 existing waste facilities adjudged to be lawful (excluding those located in OPDC), and its overarching strategy is to protect and modernise them while promoting low-carbon transport solutions. Three existing waste sites identified within the adopted Brent Local Plan for comprehensive, residential-led redevelopment are put forward in this Waste Plan to be considered for release from safeguarding, as their continued safeguarding and use for waste is likely to conflict with wider planning and regeneration objectives of the Local Plan.

London Borough of Ealing

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

London Borough of Harrow

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

London Borough of Hillingdon

3.8 Hillingdon benefits from industrial and transport hubs, including Heathrow Airport, Stockley Park, and the Hayes and West Drayton Corridor, which generate substantial commercial and industrial waste. Existing infrastructure includes the West Drayton Waste Transfer Station, the South Hillingdon Recycling Centre, and former mineral sites such as Harmondsworth Quarry. Transport strengths include access to the M4, A40, M25, and West Drayton Rail Freight Terminal, as well as the Grand Union Canal, which offers potential for non-road waste movement. However, Green Belt, AQMA coverage, and flood risk from the River Colne and canal present constraints. With around 23 existing waste facilities adjudged to be lawful, Hillingdon's strategy is to modernise and intensify existing sites where needed, expand sustainable transport use, and safeguard key facilities from displacement by redevelopment.

London Borough of Hounslow

3.9 Hounslow's Strategic Industrial Locations (SIL), including in Brentford along the Great West Road, and the North Feltham Trading Estate, and other local sites (LSIS), accommodate a number of existing waste management facilities. Growth pressures from the Great West Corridor and Heathrow Opportunity Areas are expected to increase demand for waste management capacity. The M4 provides a strategic road link, supplemented by rail freight at Transport Avenue and potential river transport via the Thames. Constraints include high air pollution along the A4/M4, flood risk in Brentford and Feltham, and extensive Green Belt. With 11 existing waste management facilities adjudged to be lawful, the borough aims to expand low-carbon waste management, modernise and intensify existing sites where needed, and increase sustainable waste movements through utilising river and rail-based waste transport options. One existing waste site identified within the adopted Hounslow Local Plan for comprehensive, residential-led redevelopment is put forward in this Waste Plan to be considered for release from safeguarding, as its continued safeguarding and use for waste is likely to conflict with wider planning and regeneration objectives of the Local Plan.

Old Oak & Park Royal Development Corporation (OPDC)

3.10 The OPDC area includes London's largest Strategic Industrial Location, accommodating around 2,000 businesses in sectors such as logistics, food production, and creative industries. It is also one of the UK's largest regeneration projects, supporting the delivery of tens of thousands of new homes and jobs. Existing waste management facilities are located within Park Royal SIL as well as in areas planned for new mixed-use neighbourhoods.

Transport links are strong, with the A40, A406, multiple rail connections, and the Grand Union Canal offering multimodal opportunities. However, constraints include AQMA coverage, the proximity of Wormwood Scrubs MOL, High Speed 2 (HS2) construction impacts, and flood risk from the canal. With five existing waste facilities adjudged to be lawful, the OPDC's strategy is to safeguard existing waste infrastructure when it doesn't conflict with wider development aspirations, embed waste solutions into regeneration, and promote rail and canal-based waste transport.

London Borough of Richmond upon Thames

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

Common Themes

3.12 Several themes emerge from the above Plan area analysis.

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

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

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

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

Proposed Planning Strategy

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

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

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

4 Waste Management in West London

4.1 The legal definition of waste, set out in section 75(2) of the Environmental Protection Act 1990[4], is "..*any substance or object which the holder discards, or intends or is required to, discard*". The key concept relates to the producer or holder's intention regardless of whether the waste may have a value to the recipient.

Scope of the emerging updated WLWP

4.2 The emerging updated WLWP will focus on providing for the principal types of waste produced within West London, which are as follows:

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

4.3 Local Authority Collected Waste (LACW) consists of waste which comes into the possession of, or under the control of, the local authority including waste collected from households (household waste). LACW collected by or on behalf of the Boroughs can include household waste (residual, dry mixed recycling and food waste), street sweepings, green waste from maintenance of open spaces, and a small quantity of clinical waste[5]. Depending upon the local arrangements, LACW can include commercial waste collected by trade waste operations.

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

4.4 Waste produced by businesses. A significant proportion of commercial waste (c60%) is also classed as 'municipal waste' and is therefore subject to statutory management targets that also affect LACW set out in a subsequent section of this draft Plan.

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

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

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

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

4.6 Construction, Demolition & Excavation (C, D & E) waste comprises waste arising from construction and demolition activity, including excavation during construction activities, and is made up of mainly inert[6] materials such as soils, stone, concrete, brick and tile. However, non-inert elements such as wood, metals, plastics, cardboard, and offcuts of plasterboard may also be present in this waste stream. Due to their weight, the inert elements make up the majority (c.80%) of the total tonnage.

4.7 The London Plan deals with Construction and Demolition waste separately to excavation waste, as excavation waste is not normally suited to recycling, and this distinction is recognised in the waste evidence reports produced to support production of this Plan. The London Plan does not apportion quantities of C, D & E waste for management, but LPAs are still required to plan for this waste stream to meet national planning policy.

Hazardous Waste

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

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

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

Existing Management Arrangements for West London's waste

4.10 This section sets out how the main waste streams relevant to the draft emerging WLWP are currently managed.

Management Profiles

Local Authority Collected Waste

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

Commercial & Industrial Waste

4.12 Data for the amount of C&I waste produced is not readily available as businesses are not currently required to report on waste produced. The London Plan 2021 estimates that this waste stream represented 28% of total waste arisings in London in 2015. This compares with household waste at 17% and C,D & E waste at 54%. If that % is applied to the LACW arisings for West London above, it indicates that arisings in the Plan area may be in the region of 1 million tonnes per annum.

4.13 The London Plan provides Borough level forecasts for arisings of HIC waste combined and these are presented in Table 2 below:

Table 2: London Plan Forecast Waste Arisings for the West London Boroughs

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

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

Construction, Demolition and Excavation Waste

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

Table 3: Non-hazardous C, D & E Waste arisings from West London 2020-2023 Mean (tonnes)

Category	Type	Tonnes	
C&D waste	Inert	538,506	1,134,622
	Non-inert	596,116	
Excavation waste	Inert	2,128,422	2,132,006
	Non-inert	3,584	
Total Non hazardous C, D & E waste:		**3,266,628**	

4.15 Different types of C, D & E waste require different forms of management. For example, hard inert materials (such as concrete, brick and road planings arising from demolition and road maintenance) can be recycled for use as an aggregate, while soft materials such as soils and sub-soils can be used for beneficial purposes such as the restoration of minerals workings and in other engineering projects. The non-inert component includes timber, plasterboard and plastics which may be recycled if separated. Ultimately there is very little C, D & E waste that cannot be recycled or recovered in some way.

4.16 Excavation waste will mainly be managed through the deposit on land for beneficial purposes. This may in certain cases be consented as non-waste development and, either be subject to an Environmental Permit as a recovery to land operation, or managed as non-waste under the CL:AIRE definition of waste protocol.

4.17 The management profile for Non-hazardous C, D & E waste (including inert waste) arising in West London in 2023[7] is set out in Table 4 below.

[7] At the time of writing 2023 Waste Data Interrogator (WDI) was the most current dataset available.

Table 4: Non-hazardous C, D & E Waste in West London - Waste Management Profile 2023 (% of Total Arisings)

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

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

- At least 51% was managed through recycling or recovery;
- With 7% disposed at permitted landfills; and
- 42% transferred on for recovery or disposal.

4.19 Waste going for re-use may not be managed through permitted sites, plus a substantial proportion of C&D waste that constitutes hardcore may be converted into recycled aggregate and either used on site or sold offsite[8]. Hence the recycled/recovery value of 51% should be taken to be a minimum.

4.20 The management profile for non-hazardous excavation waste is as below:

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

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

4.21 This compares with the targets for C, D & E waste management in Policy SI7 of the London Plan, *Reducing waste and supporting the circular economy*:

meet or exceed the targets for each of the following waste and material streams:

- *construction and demolition – 95 per cent reuse/recycling/recovered;*

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

- *excavation – 95 per cent beneficial use overall and 100% of inert excavation beneficial used.*[9]

Hazardous Waste

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

4.23 The principal types of hazardous waste arising in West London making up 90% of the total arisings in 2023 are presented in Table 5 below. The five principal hazardous waste streams arose from construction activity, oil/ water separator cleaning, vehicle maintenance/ELV depollution, infectious clinical waste and Waste Electrical and Electronic Equipment (WEEE).

Table 5: Principal Hazardous Waste Component Arisings in West London 2023
Source: HWI 2023 (Environment Agency)

Hazardous Waste Type/Source	2023
C, D & E Waste	22,721
Oil/Water Separator Waste	7,159
Infectious Clinical Waste	6,323
WEEE	5,499
Vehicle Maintenance & ELV depollution	4,018
Total	**45,720**[10]

Flows to and from West London

4.24 Analysis of the best available data shows that significant quantities of waste are routinely transported between West London and other Waste Planning Authority (WPA) areas[11]. This cross- boundary movement is typical of the way in which waste is managed in general. Table 6 shows the balance between waste exported from West London and received at West London waste management facilities in 2023. This indicates that overall, a balance is achieved with the exported amount equating to the imported amount. The totals shown in Table 6 do not correspond to the arisings totals given for each waste stream above. This is because an additional tonnage of C,D & E waste has been accounted for, that is not actually attributed to West London in the source dataset[12], the Waste Data Interrogator (WDI), and therefore cannot be

[9] London Plan Footnote 164
[10] Totals less than the 52,500t total above as these are the principal waste components.
[11] See '*Identification of Strategically Significant Cross Boundary Waste Movements from West London*', BPP Consulting, October 2025
[12] See *Construction, Demolition & Excavation Waste Arising in West London to 2041* BPP Consulting

allocated by management location.

Table 6: Adjusted Tonnages of West London waste managed in permitted facilities within West London and outside West London, and tonnage of imported waste to West London facilities
Source: WDI 2023

West London arisings		Managed in West London		
	West London waste managed outside West London	**West London waste managed in West London**	**Waste imported to West London**	**Total Managed in West London**
	2,806,945	869,932	2,796,481	**3,666,413**
Total West London waste managed	**3,676,877**			

4.25 Figure 2[13] displays the balance between imports and exports by waste management method and waste type to and from West London in 2023.

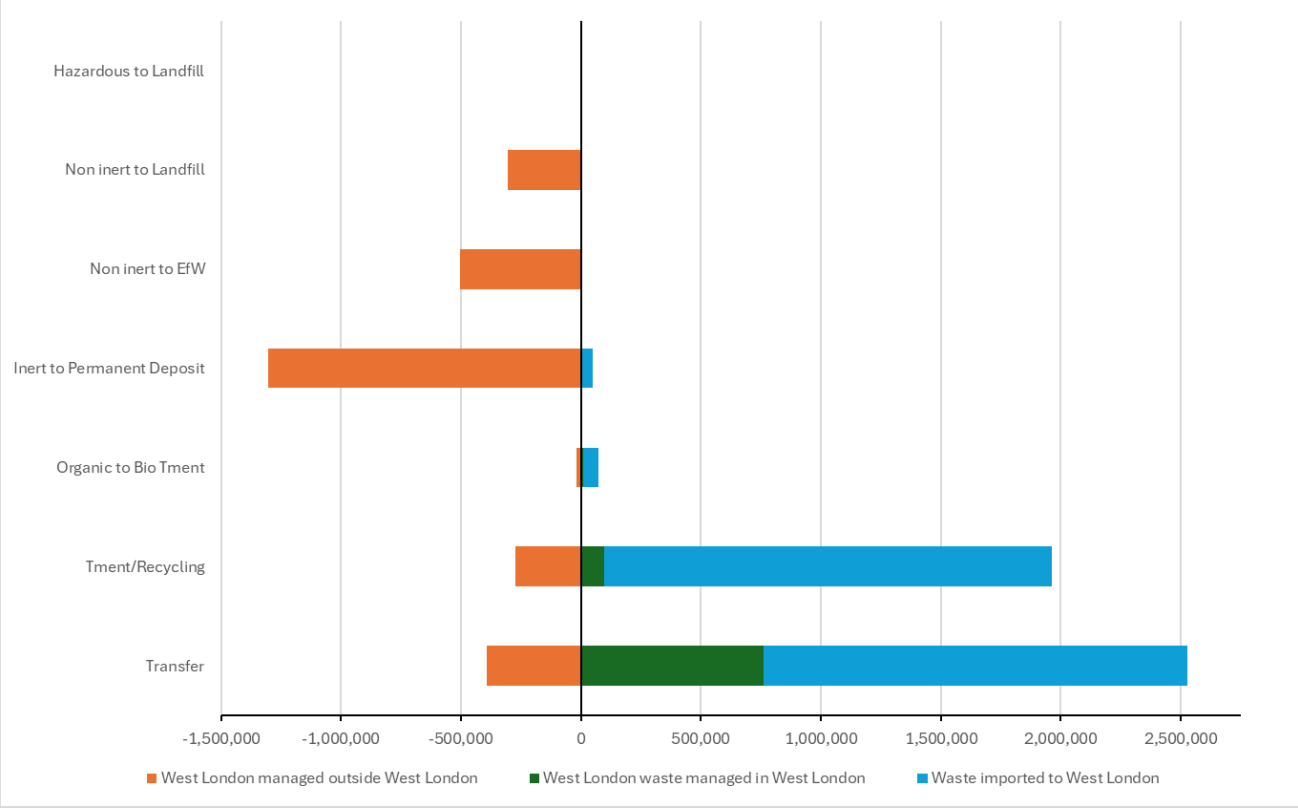

Figure 2:: Flows of Waste for Management at Permitted Facilities

October 2025

[13] Note that Figure 2 only includes waste managed at permitted sites in England and does not include any waste exported to Wales, Scotland or further afield as this is not reported in the WDI.

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

Existing Waste Management Sites in West London

4.27 There are a range of existing waste management facilities located in West London that manage waste both arising within and outside West London. It is intended that 68 sites would be safeguarded through the Plan for ongoing waste management uses and their location is shown in Figure 3 below.

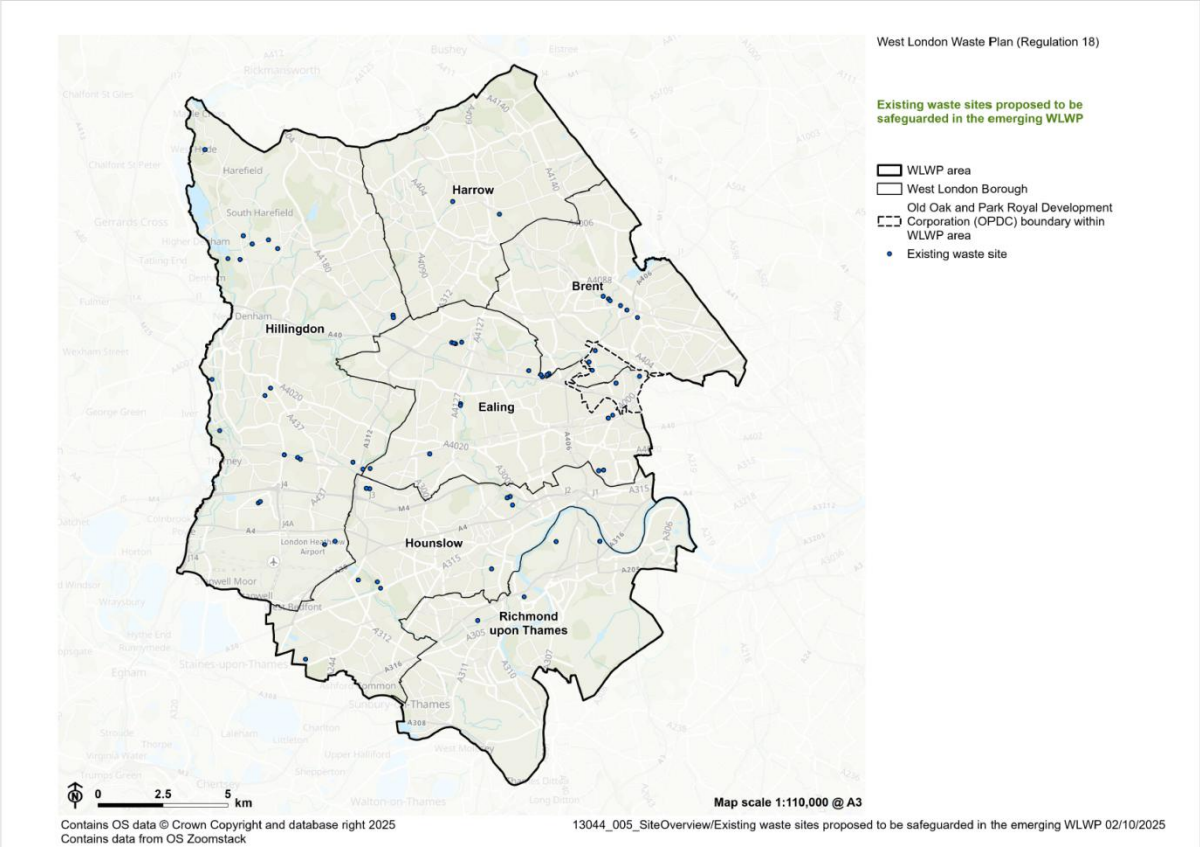

Figure 3: Map of West London Existing Waste Sites Proposed to be Safeguarded

5 The Policy Context

5.1 The policy context within which the new WLWP sits is illustrated in Figure 4 below.

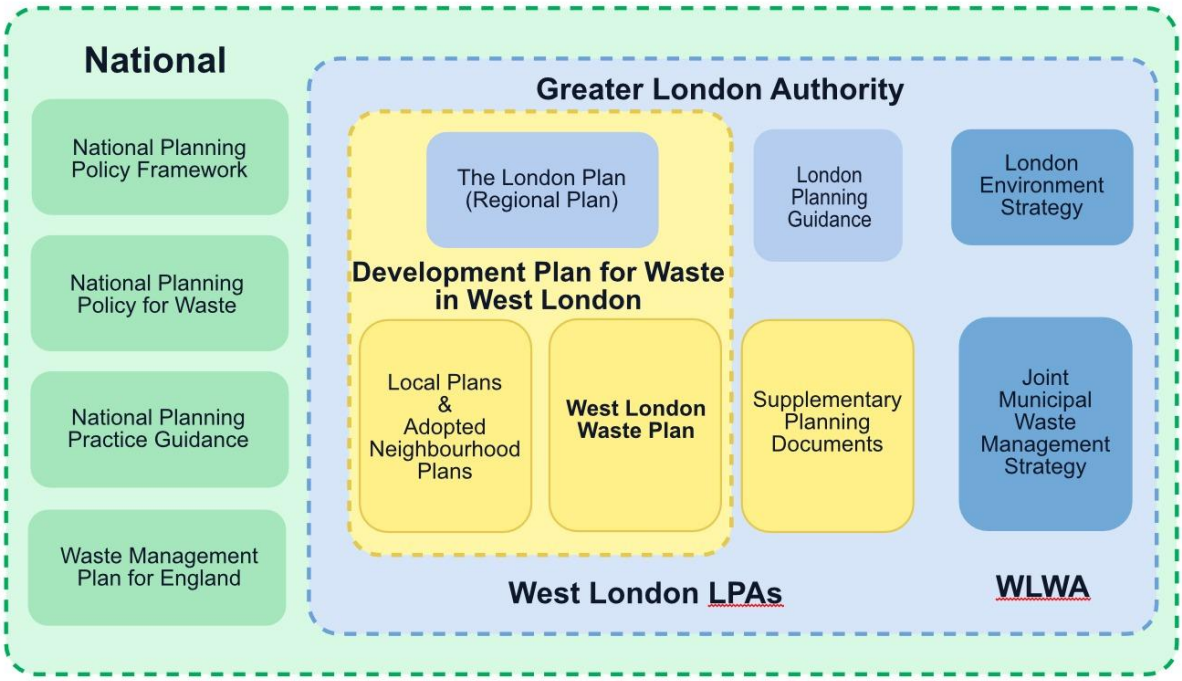

Figure 4: The Policy Context for the new WLWP

5.2 To be found sound the updated WLWP will need to be in general conformity with the London Plan and consistent with national policy. The WLWP is also aligned with the policies of the adopted Local Plans in West London. The WLWP may update relevant aspects of the Development Plan and where any conflict between policies exists the policy to have been adopted most recently generally takes precedent in decision making. Once adopted, the policies in the updated WLWP will supersede the policies in the existing WLWP. Appendix 4 sets out how the existing WLWP policies will be replaced by those set out in the updated WLWP.

5.3 Once adopted the updated WLWP will form part of the statutory development plan for the WLLPAs, to guide decision-making on planning applications in relation to waste management and related developments. The WLWP is in accordance with national policy by applying a presumption in favour of sustainable development. The Planning and Compulsory Purchase Act 2004 requires that *"... for the purpose of making any determination under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise*".

5.4 The development plan is to be read as a whole. Most adopted plans within a borough's Development Plan, such as a Local Plan, are likely to have policies which are also relevant to a waste application. Each borough may also have adopted Supplementary Planning Documents which may be relevant. Furthermore, applications will also be decided according to the policies in the London Plan, which also forms part of the development plan. Therefore, when proposing waste related development, a number of adopted plans and supplementary planning documents will have to be consulted.

National Policy

5.5 The key objective of national policy for waste[14] is to protect the environment and human health by:

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

5.6 The National Planning Policy for Waste 2014 (NPPW)[15], associated Planning Practice Guidance[16] and the Resources and Waste Strategy for England 2018 (RWS) [17] currently set the national policy context for waste planning in England. Whilst the NPPF does not contain policies specific to waste, its principles remain relevant. The Waste Management Plan for England [18] signposts policies concerning waste management in England.

5.7 The 'Waste Hierarchy' is one of the keystone principles of sustainable waste management and is enshrined into English Law. This categorises different methods of managing waste and ranks them in order of preference. This is illustrated in Figure 5 below. This shows that 'Prevention' is the most preferred option with 'Disposal' at the bottom being the option of last resort. Application of the Waste Hierarchy in priority order i.e. from the top down is a legal requirement[19].

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

[15] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

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

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

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

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

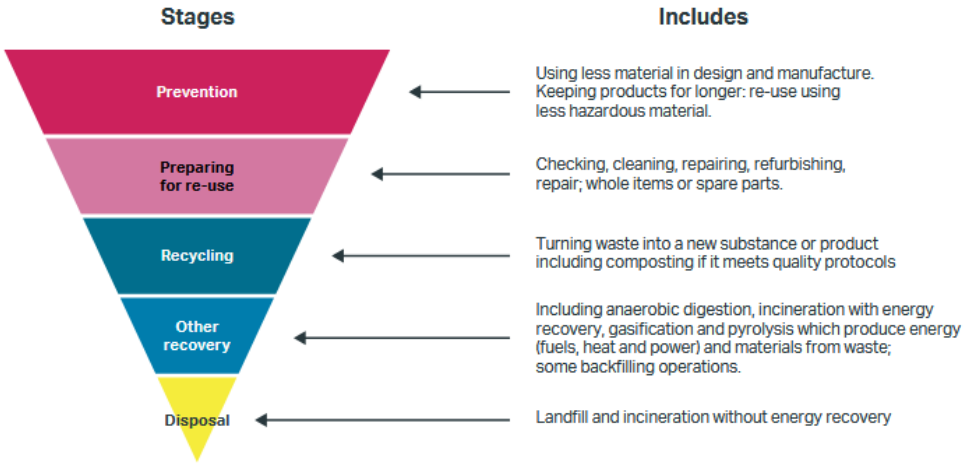

Figure 5: The Waste Hierarchy
Graphic from the Mayor's Environment Strategy (Figure 44)

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

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

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

5.10 The central role waste management plays in the material cycle as part of more circular economy is illustrated in Figure 6 below.

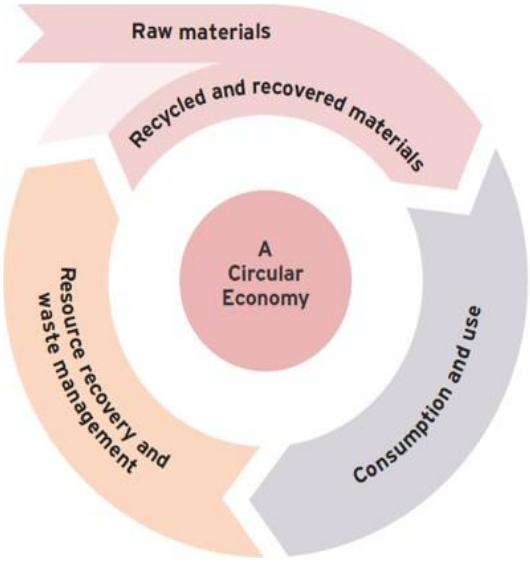

Figure 6: Circular Economy

Source: *Resources and Waste Strategy*, DEFRA, 2018

5.11 The Circular Economy is also a tool for tackling the climate emergency. When applied to the built environment, circular economy principles significantly reduce greenhouse gas emissions by avoiding extraction of raw materials, reducing production of virgin construction materials, retaining embodied carbon and eliminating waste.

5.12 The Government set the following targets in the Environmental Improvement Plan 2023[20] (EIP), which build on existing recycling and landfill diversion targets:

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

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

5.13 The target for the reduction in residual waste is enshrined in *The Environmental Targets (Residual Waste) (England) Regulations 2023*[21] which came into force on 30 January 2023. The waste target is for the reduction of residual waste (excluding major mineral wastes) on a kg per capita [22] basis by 50% by 2042 from 2019 levels (574 kg per capita). Accordingly, the residual waste long-term target is that by the end of 31 December 2042 the total mass of residual waste for the calendar year 2042 does not exceed 287 kg per capita. Waste routes which will count as residual are:

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

5.14 The EIP also set the following interim targets for the residual waste target to be achieved by 31 January 2028:

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

In addition, the following material specific targets were set:

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

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

[22] Per head of population in England

5.15 In July 2023 the Government published a national waste prevention plan entitled 'Waste prevention programme for England: Maximising Resources, Minimising Waste'[23]. This document sets out how strategic principle 2 of the Resources and Waste Strategy – to prevent waste from occurring in the first place and manage it better when it does – is to be achieved.

5.16 The Plan also notes that:

- the Government intends to prepare a 'Waste Sector Decarbonisation Plan' that will set out how the waste sector will contribute to the targets in the 6th Carbon Budget (see below);
- the National Model Design Code published in 2021[24] provides tools and guidance for developers to embed circular economy principles in all new development including waste management facilities;
- NPPW expects planning authorities to ensure that new development includes proposals for handling waste arising from the construction and operation of development maximises reuse and recovery opportunities, and minimises off- site disposal; and,
- Chapter 2 of the NPPF recognises the need for the planning system to consider the prudent use of natural resources and waste minimisation in the pursuit of sustainable development.

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

5.18 In December 2024, The Government published a 'Residual waste infrastructure capacity note' indicating that, following the implementation of policies mentioned above, there would be sufficient residual waste infrastructure capacity to treat forecast municipal residual waste arisings in London. However, it did identify a possible capacity shortfall in London when all residual waste was considered, assuming that all such waste was suitable for diversion from landfill.[25]

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

[24] https://www.gov.uk/government/publications/national-modeldesign-code

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

Climate change

5.19 The Climate Change Topic Paper[26] accompanying the draft Plan summarises the measures that waste planning and management can take both to mitigate climate change, by reducing greenhouse gas emissions, and to adapt to its likely impacts.

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

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

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

5.23 Beyond the hierarchy, general mitigation measures include improving energy efficiency and increasing the supply and use of renewable and low-carbon energy and heat. Development should identify opportunities to source energy from decentralised systems and facilitate co-location of potential heat customers and suppliers, for example by linking waste management facilities with district heating networks.

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

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

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

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

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

The Proximity Principle and Net Self Sufficiency

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

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

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

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

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

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

5.33 When planning for waste, the NPPW expects WPA areas to assess whether the unmet needs of other areas could be met within their own areas.

Regional Policy – The London Plan

5.34 As stated previously, to be found sound the updated WLWP will need to be in general conformity with the London Plan. Hence this section presents a summary of the key requirements of the current adopted London Plan (2021) it is considered the updated Plan needs to address.

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

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

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

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

- energy recovery in London;
- production of solid recovered fuel (SRF) and refuse derived fuel (RDF) in London;
- sorting or bulking for re-use or recycling including anaerobic

digestion. The reuse or recycling may take place within or outside London providing the sorting and bulking capacity is located within London; and

- reuse or recycling including anaerobic digestion within London.

The London Plan forecasts of arisings and apportionments of HIC waste for the West London Boroughs to which this Plan relates are set out in Table 7 below. There are no separate forecasts or apportionments for the area falling under the jurisdiction of the OPDC – although Mayoral Development Corporations such as OPDC must cooperate with host boroughs to meet identified waste needs in line with London Plan policy.

Table 7: London Plan Forecast HIC Waste Arisings & Apportionments for the West London Boroughs (tonnes per annum)

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

5.39 The apportionments for West London are significantly higher than the area's projected arisings which demonstrates how West London is expected to make a significant contribution to the London Plan's 2026 net self-sufficiency target.

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

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

5.41 In addition, in connection with hazardous waste management capacity, paragraph 9.8.18 of the London Plan identifies *'…a need to continue to identify hazardous waste capacity for London'* within the context of identifying sites for regionally significant facilities working with neighbouring authorities. These neighbouring authorities could either be within London, or may be located beyond its boundaries. Given national policy does not include an expectation for Plan areas to achieve net self sufficiency for the management of hazardous waste due to its diverse nature and the need for regionally significant facilities to have an extensive catchment to capture a critical mass of waste, it is taken that the London Plan allows for this. This is achieved through Duty to Cooperate engagement with WPAs outside London hosting facilities that receive strategically significant amounts of hazardous waste from west London, identified in the evidence base report[27].

5.42 The London Plan requires borough Development Plans to "*3) allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste…*" (Policy SI 8 Criterion B 3)). This is in line with the NPPW which requires waste planning authorities to "identify sites and/or areas for new or enhanced waste management facilities". The London Plan identifies existing waste sites, Strategic Industrial Locations, Locally Significant Industrial Sites and safeguarded wharves as suitable for new waste facilities. As stated previously, it also requires Mayoral Development Corporations such as the OPDC, to cooperate with host boroughs to meet identified waste needs.

5.43 The London Plan seeks to safeguard existing waste sites and retain them in waste use. Paragraph 9.9.1 of the London Plan defines existing waste sites as *"…land with planning permission for waste use or a permit from the Environment Agency for a waste use."*
The London Plan requires compensatory capacity to be provided in London if an existing waste site is redeveloped for a non waste use. Compensatory capacity must be at or above the same level of the waste hierarchy of that which is lost, and any loss of hazardous waste treatment or disposal capacity must be replaced on a like for like basis. Existing waste sites may be released without re-providing capacity if it can be demonstrated that there is sufficient capacity elsewhere in London to meet the apportionment and in the case of non-apportioned waste the target of achieving net self-sufficiency, where it applies, is not compromised.[28]

[27] '*Identification of Strategically Significant Cross Boundary Waste Movements from West London*', BPP Consulting, October 2025
[28] The target of net self sufficiency for London is not applied to the management of excavation waste or hazardous waste.

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

5.45 Furthermore, the London Plan includes policy (Policy SI 8 Waste capacity and net waste self sufficiency) that sets criteria that development proposals for additional waste management capacity are expected to address, plus wider considerations such as job creation and social value, local need and accessibility of services to local communities and businesses.

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

London Environment Strategy (May 2018)

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

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

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

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

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

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

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

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

5.51 In performing their waste functions, waste authorities are expected to act in general conformity with the municipal waste provisions of the strategy. General conformity in that context only applies to activities involving local authority collected waste (LACW).

London-wide Climate Emergency

5.52 In December 2018, the London Assembly declared a climate emergency and called on the Mayor of London to do likewise and put in place specific emergency plans for London to achieve carbon neutrality by 2030. The Mayor declared a climate emergency shortly after the Assembly and set a target for London to be net zero-carbon by 2030. All six West London boroughs have declared a climate emergency and the impact of these on the emerging Plan is considered in detail in the accompanying Climate Change Topic Paper.[29]

[29] *Climate Change Topic Paper* BPP Consulting October 2025

Local Policy

LPA Local Plans and Related Plans and Guidance

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

Brent

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

Ealing

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

Harrow

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

Hillingdon

5.57 Hillingdon's Local Plan encourages high-density development in urban centres and modal shift away from car use. Policies support renewable energy generation, sustainable land remediation, and comprehensive water management. SuDS are required unless demonstrated to be unviable, and biodiversity enhancements such as green roofs and living walls are promoted. Developments within proximity to heat networks must connect unless exempted, and financial contributions may be sought for flood mitigation.

Hounslow

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

Richmond upon Thames

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

Old Oak and Park Royal Development Corporation (OPDC)

5.60 The Old Oak & Park Royal Development Corporation (OPDC) is a Mayoral Development Corporation, which covers parts of three London Boroughs including Brent and Ealing (see Figure 3 above). The OPDC is the local planning authority for its area but does not have responsibility as a waste collection or waste disposal authority for its area. OPDC does not have a separate apportionment in the London Plan. As a Mayoral Development Corporation, OPDC is expected to "…cooperate with host boroughs to meet identified waste needs" (Policy SI8 of the London Plan) and is a joint partner alongside the six other local planning authorities working together to develop the Plan. Only the Brent and Ealing parts of the OPDC area are covered by the WLWP.

5.61 The OPDC Local Plan (2018–2038) forms part of the Development Plan for the part of the London Boroughs of Brent, Ealing and Hammersmith and Fulham to which it relates. It supports integrated development aligned with strategic housing and employment targets. Policies require carbon emissions to meet or exceed London Plan standards, with financial contributions where on-site reductions are not achievable. Water management, biodiversity enhancement, and circular economy principles are integral to the design and delivery of development proposals.

West London Waste Authority

5.62 The West London Waste Authority (WLWA) otherwise known as West London Waste[30], is a statutory joint 'waste disposal authority' (WDA) with responsibility for the management of household and commercial waste collected by or on behalf of the West London Boroughs, serving approximately 1.7 million residents across 38,000 hectares. WLWA also operates a public Reuse and Recycling Centre at Twyford to serve local residents. WLWA is a resource transformation body and has a dedicated Circular Economy team to drive innovation, so materials are kept in use for longer through reuse, repair, remanufacture, and recycling.

5.63 In 2002, WLWA entered into a 25-year contract with SITA (now SUEZ) to deliver an Integrated Waste Management Contract for LACW produced in West London. This relies extensively on the export of residual LACW by rail for EfW from two existing waste sites with railheads, Transport Avenue (Hounslow) and Victoria Road (Hillingdon) following processing into RDF. As a result the quantity of west London LACW sent to landfill has reduced to virtually nil.

Local Climate Change Strategies

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

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

6 Vision and Objectives

The Vision

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

West London Waste Plan Vision

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

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

The **network of management facilities** across west London will continue to ensure that **at least an equivalent amount** of waste produced within west London is managed within it plus a contribution is made to achieving net self-sufficiency for London as a whole as necessary. There will be sufficient flexibility to manage waste from outside the 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 all relevant **environmental standards** as a minimum and meet evolving operational needs.

Strategic Objectives

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

West London Waste Plan Strategic Objectives

Strategic Objective 1: Make best use of Existing Waste Infrastructure to manage waste efficiently

- **Safeguard existing waste sites** across west London to retain sufficient capacity to manage at least the equivalent tonnage of waste 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 including greenhouse gas emissions.

7 Future Requirements for Waste Management Capacity

7.1 In order to establish how much waste management capacity is needed over the Plan period a study[31] was undertaken that considered amongst other matters how the requirements of the London Plan could be met. The findings of the study are set out below.

Management Capacity for Apportioned HIC[32] Waste

7.2 It is estimated that current qualifying waste management capacity in West London is capable of managing c.2.81 million tpa of HIC waste. This is more than sufficient to manage the London Plan apportioned forecast arisings to 2041. Table 8 below shows that the surplus capacity for the management of apportioned waste at 2041 is estimated to be c0.58.Mtpa.

Table 8: Combined apportionment for West London Boroughs compared to Estimated Apportionment Capacity in West London (after release of sites)

	Baseline	2041 Forecast
Apportionment (London Plan 2021)	2,092,000	2,221,000
Assessed Capacity (2025)	2,807,586	2,805,432
Difference	+715,589	+584,432

Management Capacity for C, D & E Waste

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

7.4 When C&D waste is considered alone, the arisings value is 1.13Mt in 2023 rising to 1.26Mt in 2041. This compares with assessed capacity of 2.5Mtpa in 2023 reducing to 2.47Mtpa in 2041, giving a capacity surplus of 1.35Mtpa in 2023 and 1.2Mtpa in 2041 respectively. As excavation waste is not subject to the expectation of net self-sufficiency, capacity has not been assessed.

[31] West London Waste Plan, *Assessment of Existing Waste Management Capacity,* BPP Consulting, October 2025

[32] Household Waste plus Commercial and Industrial waste

Management Capacity for Hazardous Waste

7.5 A forecast for hazardous waste arisings to 2041 indicates that 50,900 tpa will be produced in 2041. This compares to existing hazardous waste management capacity of 116,000tpa which indicates there is a capacity surplus of approximately 64,400tpa in 2041.

Requirements for landfill

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

7.7 Monitoring of landfill availability, and ongoing liaison with relevant WPAs will help ensure sufficient capacity is planned for while the Plan's focus remains on reducing the area's non-hazardous landfill requirement to an absolute minimum in line with the national residual waste reduction target. Policy WLWP5 does however provide for the possible development of such capacity within West London where exceptional circumstances prevail.

Providing for Unmet Needs from Elsewhere within London

7.8 The London Plan[33] expects Boroughs to offer to share any surplus capacity with other London boroughs that may be facing a shortfall before considering release of existing sites from waste use. In light of the identified surplus in C, & D waste and apportioned HIC waste management capacity, the LPAs intend to invite other London boroughs to consider whether the surplus in West London might offer an opportunity for their unmet needs to be met. It should be noted that the most recent dataset for 2023 shows significant tonnages of waste that arise from outside the WLWP area are managed at facilities located within the WLWP area (hence the existence of the identified capacity surplus).[34]

7.9 Any agreements on sharing capacity will be formalised in a Statement of Common Ground (or similar) to which all the LPAs party to the WLWP, and the Plan making entity seeking to share in West London capacity will be

[33] Paragraph 9.8.6, London Plan 2021
[34] See '*Identification of Strategically Significant Cross Boundary Waste Movements from West London'*, BPP Consulting, October 2025

signatories. Such agreements would cover a specified period (which may be less than the period of this Plan) and be subject to review and renegotiation, including as part of future reviews of the WLWP in light of adoption of the new London Plan. Any such agreements will be reported in the West London LPAs' Authority Monitoring Reports (AMR).

8 Future Waste Management Capacity in West London

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

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

8.2 The list of sites proposed to be safeguarded through the emerging updated WLWP is included in Appendix 2, with maps included in Appendix 3. The safeguarding policy is Policy WLWP1. WLWP1 also sets out the circumstances when proposals for additional waste management capacity might be acceptable.

8.3 Existing waste sites that fall within areas identified for redevelopment in LPA Local Plans for non-waste uses are listed in Table 9 below. The loss of the capacity offered by these sites is considered in a separate report[35]. When the prospective loss of capacity offered by these sites is factored into the assessment of existing waste management capacity, outlined above, surpluses for the management of HIC waste and C&D waste still remain.

Table 9: Existing Waste Sites Proposed for Release from Safeguarding

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

[35] *Safeguarded Sites for Release in West London – Assessment Report*, BPP Consulting, October 2025

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

9 Proposed Policies

9.1 The following section sets out the policies the west London LPAs intend to include in the updated WLWP for use when the LPAs are determining applications for planning consent for waste related development in West London. The relevant policies set out below will be applied alongside any relevant policies in other documents that form part of the development plan.

9.2 The proposed policies are summarised below:

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

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

Policy WLWP 2 – Provision of Additional Waste Management Capacity.

Policy making provision for compensatory and windfall capacity.

Policy WLWP 3 – Residual Waste Management and Energy Recovery.

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

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

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

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

Policy defining specific conditions under which proposals for:

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

Policy WLWP 6 - Circular Economy & Resource Efficiency.

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

9.3 Each of the proposed policies are set out in detail in the following section.

Policy WLWP 1 – Safeguarding and Optimising the Waste Site Network

Policy Purpose: *Protecting, enhancing and optimising the network of waste sites so that sufficient waste management capacity is provided for the plan period as follows:*

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

whilst allowing for the reprovision of capacity at suitable locations within west London.

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

9.5 The London Plan 2021 allows for the redevelopment of existing waste sites for non-waste uses providing an equivalent amount of replacement (aka compensatory) capacity is provided. There is also a provision in the London Plan that allows for release without replacement capacity being provided where it is demonstrated there is already sufficient capacity to allow the London Plan apportionments to be met elsewhere in London and the capacity that would be lost is not required to ensure net self-sufficiency is met. This is based on capacity increases at waste sites being implemented over the Plan period[36], which in turn is based on the assumption that the current capacity provided by existing waste sites across London is insufficient to meet the London Plan objectives and targets. Where compensatory capacity is required, the London Plan 2021 states that the quantum should be based on the peak recorded input to the site in question over the most recent five years for which data is available. If such data is unavailable, an appropriate assessment of potential capacity may need to be made. The Environment

[36] London Plan 2021 paragraph 9.9.3

Agency's Waste Data Interrogator dataset is recommended for the identification of peak input to sites that have been operational during the five year period to which data relates.

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

9.7 The London Plan 2021 currently defines existing waste sites as:

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

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

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

9.8 Such sites may also benefit from an Environmental Permit issued by the Environment Agency for waste-related operations, but such a permit's existence is not considered determinative on the matter of safeguarding as that is properly a land-use planning rather than pollution control matter. Therefore sites that are only subject to an Environmental Permit for waste use, and do not have a planning permission, a CLEUD, or are not otherwise considered lawful under planning legislation, are not included within this definition. An assessment of the capacity for each safeguarded site in West London was undertaken and included in the Waste Capacity Assessment[37].

9.9 Proposals to develop a safeguarded waste site for waste management uses

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

will be supported where this contributes to the optimisation of waste management capacity of the Plan area.

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

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

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

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

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

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

9.15 LPAs will enforce provision of replacement capacity through conditions on the planning consent granted to the site to be released and legal agreements to ensure that replacement capacity must be capable of entering into operation, in accordance of part H.

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

Policy WLWP 1: Safeguarding Existing Waste Sites

A. Waste management sites in west London will be safeguarded for their identified waste use unless otherwise identified for release.

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

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

Development of safeguarded waste sites for waste management uses

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

E. Opportunities should be explored to co-locate waste management facilities together and with complementary activities, provided cumulative effects remain acceptable.

Release of safeguarded waste sites for non-waste uses

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

In certain instances, the following will also be relevant considerations with a degree of weight:

- the site's particular circumstances (including allocation within a Local Plan for an alternative use),
- throughput capacity consented through a previous planning consent,
- reported throughput (based on the Waste Data Interrogator or an equivalent data source), and
- wider market conditions.

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

Policy WLWP 1: Safeguarding Existing Waste Sites (continued)

G. If the capacity of the existing safeguarded waste site is shown to be surplus to requirement for London as a whole over the Plan period (and it can be demonstrated, where relevant, that this takes account of current and upcoming London Plan apportionment targets and net self-sufficiency targets), such sites could be released for other land uses. This approach should be applied by facility and waste type [42].

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

Railheads and Wharves

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

Neighbouring developments

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

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Implementation

9.17 Safeguarded sites are those waste sites whose capacity has been counted as contributing towards meeting the above need as listed in Appendix 2, unless they have been released from safeguarding. Following adoption of this Plan, updates on the list of waste management sites that meet the definition will be provided in Authority Monitoring Reports produced by the LPAs.

9.18 The planning authority may seek financial reimbursement from the applicant to cover the cost of independent expert scrutiny where capacity matters require further verification.

[38] See para 9.8.20 and Policy D13 of the London Plan (2021)

Policy WLWP 2 – Provision of Additional Waste Management Capacity

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

Need for additional capacity and waste hierarchy

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

9.20 The most recent waste management capacity assessment[39] demonstrates that there is a surplus of capacity in West London. This is needed for the management of current and forecasted future waste arisings within the Plan area, plus that to meet the London Plan apportionments. Therefore, there is no identified need for development of additional capacity within the Plan area. The capacity of sites to be safeguarded for waste use[40] exceeds that assessed to be needed over the Plan period. This provides a degree of flexibility should waste management requirements change or London Plan apportionments increase through the new London Plan.

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

Location

9.22 While existing capacity in west London has been assessed to be sufficient to meet identified management needs over the Plan period, development of additional capacity, for example to move the management of waste up the waste hierarchy or to provide compensatory capacity to allow release of select existing waste sites is still encouraged. The London Plan (Policy SI8 B4) identifies suitable locations for the provision of additional waste management capacity as existing waste sites, Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs), and safeguarded wharves with existing or potential for waste management. The emerging WLWP reflects the same approach as the London Plan Policy SI8 B4 and supports development

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

[40] See Appendices 2 and 3.

of waste management sites providing it is located either on existing waste sites, or on industrial land identified as suitable in LPA Local plans, where the grant of consent would be consistent with other policies of the development plan including those protecting the environment, health and amenity.

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

Policy WLWP 2: Provision of Additional Waste Management Capacity

Emerging Capacity Needs

A. Proposals for additional waste management capacity will be supported in principle where they:
   a. Demonstrate they would contribute towards meeting a specific need for the management of waste arising within West London; or,
   b. Are for capacity which would result in target waste being managed as far up the waste hierarchy as possible; or
   c. involve re-use, repair, and remanufacturing activities, including Circular Economy Hubs, assessed to constitute waste development.

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

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

C. Proposals for capacity that will facilitate the use of C, D & E waste, and its conversion into products suitable for use (reflecting circular economy principles) will be supported in principle.

D. On major development sites, the establishment of temporary material exchanges and C, D & E waste processing facilities during construction should be considered where this is demonstrated to not have significant adverse effects on the environment, local amenity and does not hinder timely completion of construction.

Hazardous Waste

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

Policy WLWP 2: Provision of additional Waste Management Capacity (con)

Locational Criteria

F. Proposals for waste capacity will be supported in principle where the following criteria are met:

It is demonstrated that:

i. It is within a safeguarded waste site; or

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

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

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

v. Where practicable and economically viable, the development makes use of sustainable modes of transport (rail or water) for the transportation of materials to and from the site both during construction and operation; and

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

9.24 For facilities managing Household Commercial & Industrial (HIC) waste, either the combined current capacity of the safeguarded sites (based on planning consent) should be taken into account to demonstrate an identified need to meet London Plan apportionment/management targets or specific needs (such as a particular technology), hence justifying the proposed additional capacity. For other waste streams, it should be shown that the proposed additional capacity will meet an identified need or enhance the range of waste management facilities available to serve the Plan area (e.g. a specialist facility to recycle a waste/material not currently separately managed in the area.

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

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

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

9.28 The assessment of impacts shall include (but is not limited to) traffic, air quality, noise, vibration, odour, litter, visual impact, and community safety/well-being as set out in Policy WLWP4.

Policy WLWP 3 – Residual Waste Management & Energy Recovery

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

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

9.29 Residual waste is normally defined as waste that is left after reuse, repair and recycling has been maximised. However, it is now defined in national legislation[41] as all waste subject to final treatment, whether sent to landfill, incinerated or treated through energy recovery (including Refuse Derived Fuel exported for energy recovery).

9.30 The term also captures within it, that amount of household waste that is managed through these routes, as well as waste arising from other sources of a similar nature as municipal waste plus certain wastes from other sources such as C, D & E waste. Figure 7 below illustrates how the total residual waste is made up.

Figure 7: Residual Waste

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

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

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

9.33 In terms of the waste hierarchy, EfW is classed as 'Other Recovery' and so, as a means of managing waste is generally less preferred than recycling but more preferred than disposal. To qualify as 'recovery', energy from waste plants must achieve a minimum level of energy efficiency as defined by 'R1' status[42]. Without R1 status such plants are technically classed as disposal. However as noted above for the purpose of monitoring progress towards the halving residual waste production per head target for 2042, waste managed through EfW is counted alongside waste disposed to landfill and waste converted to RDF.

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

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

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

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

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

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

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

Policy WLWP 3: Residual Waste Management & Energy Recovery

A. Proposals for the final management of residual waste by either 'other recovery' or disposal will only be supported if it is demonstrated:
   a. that the waste to be managed constitutes unavoidable residual waste that cannot practicably be managed higher up the waste hierarchy, and
   b. the proposals are in accordance with the proximity principle; and
   c. a need for the capacity to serve west London will exist for the lifetime of the proposed facility.

No Conflict with Recycling

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

C. Proposals must demonstrate that:
   a. incoming waste will be managed in accordance with waste hierarchy in priority order, and
   b. a local need for capacity will exist for the life time of the proposed facility.

Energy Recovery

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

E. Energy from Waste facilities must demonstrate:
   a. they qualify as a recovery operation as defined in the Waste Framework Directive and include measures to ensure energy recovery efficiency performance standards are maintained throughout their operational life as a minimum; and
   b. the release of non-biogenic gaseous carbon emissions will be minimised, with mechanisms to capture for use and/or storage if use (and prevention) is not viably incorporated into facility design; and

Policy WLWP 3: Residual Waste Management & Energy Recovery (continued)

c. residues requiring offsite management will be managed prioritising further recovery and otherwise demonstrate safe disposal as a last resort.

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

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

Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities

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

9.42 Where waste capacity is developed, it should be of high quality and contribute to the achievement of other national and development plan policies and objectives including reducing greenhouse emissions, efficient resource use, protection and enhancement of the environment (including the water environment) and protection of amenity and health. Such requirements are set out in the London Plan Policy SI8 and Local Plan policies. This applies not only to their operational impacts but also to the 'whole life-cycle' carbon emissions associated with construction.

9.43 Policy WLWP 4 provides a range of criteria to ensure developers consider and mitigate the impacts of their development on the environment, the community and the appearance of local area. The criteria detailed in the Policy has been tailored to specific waste requirements, but it should not be read as an exhaustive list. Other policy areas may be relevant to specific developments and applicants are advised to refer to other relevant policies set out in the London Plan, Borough or OPDC Local Plans, Development Management Policy documents, Site Allocations and Area Action Plans as appropriate.

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

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

9.46 The development is expected to be designed to be resilient to climate change impacts including in terms of its location, setting and orientation and managing flood risk and extreme weather events.

9.47 The road network within West London is often congested and therefore proposals must demonstrate active consideration of transport modes other than by road. Where development relies on road based transport, there must not be any significant or unacceptable adverse impacts on the local road network or other road users. Careful routing of HGVs should be used and access must be shown to be safe and appropriate to the scale and nature of movements associated with normal level of operations. Proposals should demonstrate that adequate parking for all vehicles is available on site.

9.48 Other considerations to the local environment (such as flood risk, and transport), amenity and sensitive receptors (such as health and wellbeing) will need to be addressed, but as detailed earlier in the plan, the development plan should be read as a whole and therefore have not been duplicated in this policy. As a general principle, proposed development should have no significant adverse effects on local biodiversity and opportunities to enhance biodiversity and green infrastructure on and around the site should be maximized to improve visual amenity and provide ecological benefit. In addition, proposed developments will be required to conserve and avoid harm to, or loss of significance of any heritage assets such as conservation areas, archaeological sites, listed buildings (etc.) unless justification is provided.

9.49 Environmental permitting provides the appropriate mechanism for control of operational impacts and should be assumed to operate efficiently though it is strongly recommended that applicants consider these matters in tandem with the planning application and seek early advice from the Environment Agency. The need to enclose operations may be prescribed by Environmental Permitting and such requirements will normally require planning consent.

Policy WLWP 4: Ensuring High Quality and Resilient Waste Facilities

A. All proposed waste management facilities in west London must be designed, built and operated to achieve the highest practicable environmental standards, recognising that environmental standards will evolve over the lifetime of the Plan.[43]

B. Proposals for development must demonstrate that:

1. The development is of a scale, form and character appropriate to its location; and
2. the proximity principle has been complied with (where applicable); and
3. it will deliver a lasting and positive contribution to the local environment, economy and community throughout its operational life and post-closure (if applicable) and incorporates measures to;
   - avoid unacceptable adverse impacts arising from noise, dust, litter, vermin, vibration, odour, bioaerosols, external lighting, visual intrusion, traffic or associated risks to the environment and health and wellbeing of local communities;
   - adapt and be resilient to the impacts of climate change; and
   - minimise greenhouse gas emissions from all aspects of its operation, and
   - control, reduce and mitigate impacts from vehicles including the use of low emission vehicles, installation of vehicle charging points and scheduling and management of vehicle routing.
   - any process residues requiring offsite management will be subject to further recovery wherever practicable, or otherwise demonstrate how these will be disposed safely.

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

Policy WLWP 5 – Deposit of Waste on Land

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

Non-inert Waste Landfill

9.50 The disposal of waste is at the bottom of the waste hierarchy as the least preferred form of waste management, and non-inert waste should be sent to landfill only if it cannot be managed by methods higher up the Waste Hierarchy i.e. it is an option of last resort. In exceptional circumstances it may be demonstrated that there are certain types of waste (e.g. some hazardous waste) which cannot practically be managed by any other means and so landfill[44] is the only option. Such wastes are generated in comparatively limited amounts and are generally handled at specific landfill sites designated for hazardous waste or within specially constructed cells at non-inert landfill sites.

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

9.52 Landfilled non-inert waste often gives rise to the production of landfill gas (including methane) and leachate, both of which need proper containment and management to ensure they do not cause pollution of the environment or harm to human health. In light of this, the provision of new capacity is largely reliant on the presence of certain geological and hydrogeological conditions needed to minimise the risk of groundwater pollution. While being a potential pollutant, landfill gas can be captured and put to use as a fuel to produce energy.

9.53 The restoration of landfill sites offers opportunities to enhance the environment for example by providing wildlife habitats and/or recreational

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

opportunities e.g. country parks.

9.54 In addition to generating more void space, the reworking (or 'mining') of current or historical and restored landfill sites could potentially free up land for development and/or create opportunity for the extraction of recyclable/recoverable materials previously discarded. Older landfills might also require reworking to remove waste causing pollution and/or to prevent the uncontrolled release of pollutants. However, there are significant risks associated with the reworking of landfill sites as hazardous materials may have been disposed of without being recorded. After the closure of landfills, other development, such as the building of housing, may have taken place in proximity, which could be sensitive to any change in the historic site, and the need to avoid negative impacts from disturbing a settled waste mass must be considered very carefully. Generally, the disturbance of existing waste masses containing hazardous waste should be avoided due to the risks associated with it. An Environmental Permit, intended to ensure there is no pollution of the environment or harm to human health will also likely be required for any such activity and advice from the Environment Agency should be sought.

Deposit of Inert Waste on Land for Beneficial Purposes

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

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

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

Policy WLWP 5 – Recovery and Disposal of Waste to Land

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

a) the waste will be deposited for a beneficial purpose, which cannot practicably or reasonably be achieved in any other way; and
b) the minimum amount of waste necessary will be used to deliver intended benefits or improvements; and

c) It is not practical to re-use or recycle the waste.

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

a) there is an overriding need for additional disposal capacity; and

b) the waste cannot practicably and reasonably be re-used, recycled, or recovered in some other way in any other way; and

c) measures to maximise landfill gas capture and utilisation and minimise leachate production from the proposal.

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

Policy WLWP 6 – Circular Economy and Resource Efficiency

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

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

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

9.60 Planning will need to play a role in delivery of the necessary infrastructure to facilitate the circular economy, although it is recognised that delivery will also need to be on a strategic level with reliance on other parties. There is a need to consider the current, future and legacy waste infrastructure, and what waste management looks like in a fully circular economy. Delivery may be through local Circular Economy Hubs that facilitate material exchange, re-use and remanufacturing, supported by a network of local high quality facilities combined with larger-scale infrastructure. There should be consideration as to how proposals integrate with the existing network, ensuring where relevant there is inclusive public access, as well as integration with existing communities including local groups. Proposals for waste related development located in or near designated industrial areas should seek synergies with the wider needs of the locality. The co-location of waste uses with complementary industrial uses will be supported where it enhances resource efficiency.

Circular Economy Statements

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

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

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

9.64 Soil management is essential to sustaining all natural systems, and impacts across a range of matters including landscape, ecology, forestry, flooding and contaminated land issues. The retention of healthy soil structure is essential and can be aided by minimising the installation of hard surfaces on development sites. Where appropriate, applicants may need to submit a soil survey and soils management plan that sets out the quality and type of soils on site, the impact of development on the soil, as well as detail on how the movement and damage to soils will be minimised during construction.

9.65 Policy WLWP6 provides the framework on the specific requirements for the land, facilities and infrastructure required to deliver the local needs to support the principles of the circular economy and promote sustainable waste management practices within the Plan area. This Policy should be read in conjunction with other strategic and local planning policies set out in the London Plan, Borough or OPDC Local Plans, Development Management Policy documents, Site Allocations and Area Action Plans as appropriate. In particular, waste related proposals should support local development plan policies on waste, industrial land, climate resilience and biodiversity.

Policy WLWP 6: Circular Economy and Resource Efficiency

Proposals for waste related development should:

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

B. demonstrate how Circular Economy principles have been incorporated into all aspects of its design, construction and operation.

10 Policies Map

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

11 Glossary

A	
Agent of change	A new development within an area that is of such a nature that it might be impacted by existing development or impact on that development (e.g. housing proposed within an industrial area). The 'agent of change principle' sets out a position that an applicant for planning permission (i.e. the 'agent of change') is responsible for managing any conflicts between the proposed development and existing development.
Aggregates and soils recycling	Rubble, hardcore and soil from construction and demolition projects may be retained for use on-site in place of primary aggregate. Alternatively, it can be taken to purpose-built facilities for crushing, screening and re- sale.
Agricultural waste	This mostly covers natural waste such as animal slurry/by products but also scrap metals, plastics, batteries, oils, tyres, etc. The regulations for this waste stream mean farmers can no longer manage certain waste produced within a farm unit, within the unit (historically the case) as regulations determine whether or not waste can be burnt, buried, stored or used on the farm or must be sent elsewhere for management.
Amenity	Amenity is a broad concept and is not specifically defined in Planning legislation. It is a matter of interpretation by the local planning authority and is usually understood to be the pleasant or normally satisfactory aspects of a location which contribute to its overall character and the enjoyment of residents, business users and visitors. Amenity can be adversely affected by development impacts such as noise, dust, odour and visual change.
Anaerobic Digestion (AD)	A process comprising the breakdown of organic material in the absence of air. It is carried out in an enclosed vessel and produces methane that powers an engine used to produce electricity. The useful outcomes of AD are electricity, heat, and the solid material left over called the digestate. Both the heat and the electricity can be used or sold if there is a market and the digestate can either be sold or used for agricultural purposes (land spread). AD can only be used for some biodegradable parts of the waste stream e.g. sewage sludge, agricultural waste and some organic municipal and industrial waste.
Apportionment	The amount of HIC waste allocated by the London Plan to each London Borough for which management capacity needs to be provided.

Authority Monitoring Report (AMR)	The AMR reports progress in meeting the milestones of the adopted Local Development Scheme and monitors the impact of policies when the plans are adopted. The timescale covered in each report is determined by the nature of the topic in terms of its strategic importance and sensitivity to changing circumstance.
B	
Best and most versatile agricultural land	Land categorised as being of grades 1, 2 or 3a under the Agricultural Land Classification system.
Bioaerosols	Airborne material containing biological material from animals, plants, insects or microorganisms. They are produced wherever biological material is being processed, milled, or chopped and are commonly associated with organic waste composting facilities. Bioaerosols can have impacts on health.
Biodegradable waste	Any waste that is capable of undergoing natural decomposition, such as food and garden waste, paper and cardboard.
Biodiversity	The variety of all life on earth (mammals, birds, fish, invertebrates, plants, etc). In planning, it is often used to refer to nature conservation.
C	
Catchment	The geographical area served by a particular waste management activity. This will vary according to the adequacy of transport links and the economics of transporting different types of waste
Circular Economy	A circular economy is an alternative to a traditional linear economy (make, use, dispose) in which resources are kept in use for as long as possible, the maximum value is extracted from goods and services whilst in use, and, finally, resources and products are recovered and regenerated at the end of each service life.
Climate change adaptation	Adjustments to natural or human systems in response to actual or expected climatic factors or their effects, including from changes in rainfall and rising temperatures, which mitigate harm or exploit beneficial opportunities
Climate change mitigation	Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.
Combined heat and power facilities (CHP)	CHP plants generate electricity as well as providing local heat, and sometimes even cooling, to various types of users.
Commercial and Industrial (C & I) Waste	Waste generated by business and industry, for example: wholesalers; catering establishments; shops and offices; factories and industrial plants. Generally, businesses are expected to make their own arrangements for the collection, treatment and disposal of waste generated by their actions. Waste from smaller businesses where collection arrangements have been set up by the local authority is considered to be LACW.

Composting	The breaking down of organic matter aerobically into a stable material that can be used as a fertiliser or soil conditioner. This can be undertaken commercially in open air (in 'windrows') or inside containment ('in-vessel'), and at a smaller scale by households at home or collectively by communities.
Conservation Area	An area designated by the LPA because of its special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance.
Contaminated Land	Contaminated land is land that has been polluted or harmed in some way making it unfit for safe development and usage unless cleaned.
Construction, Demolition and Excavation (C, D & E) Waste	The combined waste produced from earth moving, demolition of buildings/structures and construction of new buildings/structures. It mostly comprises brick, concrete, hardcore, subsoil and topsoil, but can also include timber, metals and plastics.
D	
Decentralised Energy	Local renewable energy and local low-carbon energy usually but not always on a relatively small scale that may encompass a range of technologies.
Deposit of Waste on Land	The placement of waste on land for the purpose of its management. This may include landfill or landraise operations, or, in the case of inert waste may involve its use in engineering works such as landscaping mounds.
Development Plan	The development plan has statutory status as the starting point for decision making. Section 38(6) of the Planning & Compulsory Purchase Act 2004 and Section 70(2) of the TCPA 1990 require that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. For waste proposals within London the development plan comprises the London Plan, Local Plans and DPDs and joint Waste Plans as well as neighbourhood plans.
Disposal	Disposal means any waste management operation which is not 'recovery' even where the operation has a secondary consequence, the reclamation of substances or energy
Dry Mixed Recyclables (DMR)	Typically composed of: Paper - e.g. dry paper waste, newspapers, office paper and magazines Cardboard – e.g. corrugated cardboard, cereal boxes and card Metal cans – e.g. clean, empty drinks cans and food tins Plastic – e.g. packaging films, rinsed out milk bottles, empty drinks bottles & clean salad trays, rinsed out margarine tubs & microwaveable meal trays

E	
Encroachment	Development which is sensitive to the normal operations of a waste/wastewater facility being built near to an existing such facility
	which may hinder its operation by requiring changes to its operating practices (e.g. reduced vehicle movements, operating hours)
Energy from Waste (EfW)	The process of managing waste to generate energy - usually in the form of electricity or heat usually by means of thermal treatment. Many wastes are combustible, with relatively high calorific values – this energy can be recovered through processes such as incineration with electricity generation, gasification or pyrolysis. EfW generally falls within the 'other recovery' category in the waste hierarchy.
Energy Recovery	Covers a number of technologies, though most energy recovery is through incineration. Many wastes are combustible, with relatively high calorific values – this energy can be recovered through processes such as incineration with electricity generation (and where possible heat recovery), gasification or pyrolysis.
European Site	Sites designated for their nature conservation importance (under the EC Birds Directive and EC Habitats and Species Directive) and protected by the Habitats Regulations. This includes Special Protection Areas (SPAs) for birds, and Special Areas of Conservation (SACs) under the Habitats Directive.
G	
Green Belt	A national planning designation, which aims to prevent urban sprawl by keeping land around certain cities and large built-up areas permanently open or largely undeveloped, defined more fully in the NPPF.
Greenfield land	Land that has not been developed. Not to be confused with Green Belt.
Greenhouse gas (GHG)	GHGs trap heat in the atmosphere. Many gases exhibit greenhouse properties, including carbon dioxide, methane, water vapour, and nitrous oxide.
Green and blue infrastructure	A network of multi-functional green space or wetlands and waterways, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.
H	
Habitats Regulation Assessment (HRA)	An assessment under the Habitats Regulations to test if a plan or project could significantly harm the designated features of a 'Habitat site'. Proposals affecting proposed SACs, potential SPAs, Ramsar Sites (wetlands of international importance) also require HRA.

Hazardous waste	Controlled waste that is dangerous or difficult to treat, keep, store or dispose of, so that special provision is required for dealing with it. Hazardous wastes are the more dangerous wastes and include toxic wastes, acids, alkaline solutions, asbestos, fluorescent tubes, batteries, oil, fly ash (flue ash), industrial solvents, oily sludges, pesticides, pharmaceutical compounds, photographic chemicals, waste oils, wood preservatives. If improperly handled, treated or disposed of, a waste that, by virtue of its composition, carries the risk of death, injury or impairment of health, to humans or animals, the pollution of waters, or could have an unacceptable environmental impact. It should be used only to describe wastes that contain sufficient of these materials to render the waste as a whole hazardous within the definition given above. Defined in the Hazardous Waste (England and Wales) Regulations 2005 (as amended).
Heritage assets	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Designated Heritage assets are the most protected and include listed buildings, scheduled ancient monuments, registered parks and gardens, registered battlefields, and World Heritage Sites.
Household waste	Waste from a domestic property, caravan, and residential home or from premises forming part of a university or school or other educational establishment and premises forming part of a hospital or nursing home. Defined in The Controlled Waste (England & Wales) Regulations 2012.
I	
Incineration	The controlled burning of waste usually in purpose-built plant subject to stringent standards for emissions to air. Bottom ash may be used in building materials. Incineration that involves the capture of energy falls within the category ‘Energy from Waste’.
Inert waste	Inert waste means waste that does not undergo any significant physical, chemical or biological transformations when untreated. Inert waste will not dissolve, burn or otherwise physically or chemically react, biodegrade or adversely affect other matter with which it comes into contact in a way likely to give rise to environmental pollution or harm human health. The total leachability and pollutant content of the waste and the ecotoxicity of the leachate must be insignificant, and in particular must not endanger the quality of surface water and/or groundwater. Non-inert (including non-hazardous) waste is all other waste other than as identified above (including hazardous).

L	
Landfill and landraise	The term landfill relates to waste disposal mainly below ground level (by filling a void) whereas landraise refers to waste disposal mainly above pre-existing ground levels. They are generally the least preferred method of waste management in the waste hierarchy.
Listed buildings	A building of special architectural or historic interest in a list compiled by the Secretary of State under the Planning (Listed Buildings & Conservation Areas) Act 1990, thereby having statutory protection. Listing of buildings includes the interior as well as the exterior of the building, and any nearby buildings or permanent structures within the curtilage (e.g. walls and outbuildings). Historic England is responsible for designating buildings for listing in England.
Local Authority Collected Waste (LACW)	All waste collected by or on behalf of a local authority. It includes household waste and other waste where collection is arranged by the local authority. LACW replaced the term 'municipal' waste.
Local Development Scheme	The timetable produced by each LPA for the preparation of Local Plans.
Local Nature Reserves (LNRs)	An area designated by local authorities, in consultation with Natural England under the National Parks & Access to the Countryside Act 1949, to provide opportunities for educational use and public enjoyment, in addition to protecting wildlife or geological and physiographical features of special interest.
Local Planning Authorities (LPAs)	The public authority whose duty it is to carry out specific planning functions for a particular area.
Local Plan	A plan for the future development of a local area, drawn up by the LPA in consultation with the community. In law this is described as the development plan documents adopted under the Planning & Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under law would be considered to be DPDs, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.
Local roads	These are taken to include: A roads (not including trunk roads and primary routes). B roads – which are roads intended to connect different areas, and to feed traffic between A roads and smaller roads on the network. Classified unnumbered roads which are smaller roads intended to connect together unclassified roads with A and B roads, and often linking a housing estate or a village to the rest of the network. Similar to 'minor roads' on an Ordnance Survey map and sometimes known unofficially as C roads. Unclassified roads which are local roads intended for local traffic. The vast majority (60%) of roads in the UK fall within this category.
LSIS	Locally Significant Industrial Sites.

M	
Major development	For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m2 or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.
Mass burn incinerator	Large facilities where waste is burnt, and normally where energy is captured for use to produce electricty as a minimum.
N	
National Planning Policy Framework (NPPF)	The NPPF sets out the Government's planning policies for England and how these are expected to be applied.
National Planning Policy for Waste (NPPW)	Adopted in October 2014, this document sets out the Government's waste planning policies for England.
Net self-sufficiency	To have sufficient waste management capacity capable of managing the equivalent amount of waste to that expected to arise within a Plan area.
Non-inert waste	A waste that will biodegrade or decompose, releasing environmental pollutants. Examples include: wood and wood products, paper and cardboard, vegetation and vegetable matter, leather, rubber and food processing wastes.
O	
Open space	All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.
Other Recovery	Other recovery is not specifically defined in the revised Waste Framework Directive, although 'energy recovery' is referenced as an example. It can be assumed by their exclusion in the definition of recycling, that processing of wastes into materials to be used as fuels or for backfilling can be considered 'other recovery'.

P	
Plan area	The geographical area covered by the West London Joint Waste Plan i.e. the area covered by the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond upon Thames and that part of Ealing and Brent that falls under the aegis of OPDC.
Pollution	Anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.
Planning Practice Guidance (PPG)	Government guidance intended to assist practitioners in interpreting national planning policy.
Previously developed land	Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardsurfacing providing it has been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.
Proximity Principle	The 'proximity principle' is set out in paragraph 4 of Part 1 of Schedule 1 to the *Waste (England and Wales) Regulations 2011* within the context of the requirement for mixed municipal waste collected from private households to be disposed of, or recovered, in one of the nearest appropriate installations, by means of the most appropriate methods and technologies, in order to ensure a high level of protection for the environment and public health.
Public Rights of Way (PRoW)	PRoW are paths that all members of the public can legally use: footpaths – for walking, running, in mobility scooters or powered wheelchairs; bridleways – for walking, horse riding, bicycles, mobility scooters or powered wheelchairs; restricted byways – for any transport without a motor and mobility scooters or powered wheelchairs; byways open to all traffic – for any kind of transport, including cars (but mainly used by walkers, cyclists and horse riders).
Pyrolysis	The combustion of waste in the absence of oxygen, resulting in the production of liquid, gas, char, whose after-use depends on the type of waste incinerated.

R	
Receptor	Existing land uses that could be affected by a proposed development. Some examples of receptors include: Residential dwellings; hospitals; commercial premises; and, footpaths.
Recovery	Recovery means any waste management operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfill a particular function, or waste being prepared to fulfill that function, in the plant or in the wider economy.
Recovery to Land	The use of inert material for a genuine beneficial use such as landscape and/or amenity improvements.
Recycling	Recycling is a recovery operation by which waste materials are returned to be processed into products, materials or substances whether for the original e.g. glass to remelt or other purposes e.g. glass to aggregate. Includes the reprocessing of organic material but not energy recovery or the reprocessing into materials that are to be used as fuels or for backfilling operations.
Refuse Derived Fuel (RDF)	Residual waste that is prepared for thermal treatment in an energy from waste facility or co-incineration plant.
Renewable and low carbon energy	Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass, ground and air, and geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).
Residual waste	The elements of the waste streams that remain following the maximising of recovery operations. Residual waste now defined as that managed by landfill, EfW and as RDF.
Restoration	Process of returning a site or area to a desirable condition following waste management use or mineral extraction.
Reuse	Re-using products and materials as part of the circular economy, avoiding the need for re-processing or disposal. The preferred fate on the waste hierarchy for waste produced. The commercial sector can reuse products designed to be used a number of times, such as reusable packaging. Householders can buy refillable containers or reuse plastic bags. Reuse can save raw materials, energy and transport costs.
S	
Safeguarding	The protection of existing waste sites from development that may limit or constrain such uses, now or in the future.
Sites of Special Scientific Interest (SSSI)	A site which is of special interest by reason of any of its flora, fauna, or geological or physiographical features and has been designated by Natural England under the Wildlife and Countryside Act 1981.

Special Areas of Conservation (SAC)	Areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites.
Special Protection Areas (SPAs)	Areas classified under regulation 15 of the Conservation of Habitats and Species Regulations 2017 which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds.
Strategic Industrial Locations	Sites identified (including in the London Plan, Policy E5) as critical to the London economy and which can accommodate concentrations of industrial, logistics and related activities and land uses including waste management.
Sustainability Appraisal (SA)	A process of analysing and evaluating the environmental, social and economic impacts of the plan or programme, often in conjunction with an SEA.
Sustainable Waste Management	Waste management in line with the waste hierarchy in which waste generation is avoided as far as possible, materials and products are re-used, recycled or have as much value recovered from them as possible, before disposal is considered. This is delivered through product design, behaviour and choices, and through provision of sufficient waste management capacity of the required type, where possible proximate to where waste arises.
Supplementary planning documents	Planning documents which expand upon policy or provide further detail to policies in development plan documents, but do not have development plan status
T	
Thermal treatment	A waste management operation that involves the use of heat to process waste and generally involves the production of energy. Incineration is a thermal treatment but 'Energy from waste' is the term more generally used to describe waste management involving incineration.
Tonne	Metric Ton. 1000 kilos, equal to 2004 lbs.
tpa	Tonnes per annum
Mtpa	Million tonnes per annum.
W	
Waste	Any substance or object that the holder or the possessor discards or intends to discard or is required to discard.
Waste arisings	This is the amount of waste produced in a given area, normally a Plan area, at a given period of time, usually reported as tpa.
Waste Disposal Authority (WDA)	A local authority responsible for managing the waste collected by the collection authorities and the provision of household waste recovery centres. In this case the West London Waste Authority (WLWA) is a joint WDA for the whole Plan area.

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

Appendices

Appendix 1 – Monitoring Framework

Monitoring of the West London Waste Plan will take place in accordance with the framework set out below. Results will be reported in Authority Monitoring Reports.

Introduction

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

Monitoring will take place at least annually and outcomes reported Authority Monitoring Reports.

Structure

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

Column headings associated with the Monitoring Framework are explained below:

- **Policy** – The reference number of the Policy which the indicator is seeking to monitor the efficacy and implementation of;
- **Indicator** – What the monitoring indicator is intended to measure;
- **Purpose** – How the indicator will monitor for the policy outcome;
- **Target** – The intended measure of success achieved by implementation of the Policy;
- **Data Sources** – various sources of data available to measure implementation of the policy. The framework relies on publicly accessible statutory/official datasets and local registers (e.g., Waste Data Interrogator, WasteDataFlow,

Hazardous Waste Interrogator, Environment Agency permit register, local planning registers and compliance data gathered). Where data is incomplete, an explanation will be provided in the AMR, and, if appropriate, interim proxy indicators used until full data is available. During the Plan period the LPAs may also monitor additional indicators and report on associated performance in the AMRs as additional datasets become available.

- **Delivery Responsibility** – which bodies contribute towards implementation of the policy:
  - Local Planning Authorities (LPAs): maintain planning registers, apply policies through development management decisions, and report through AMRs.
  - WLWA and operators: supply operational data and are primarily responsible for the type and quantum of waste management capacity provided in the Plan area.
  - Environment Agency (EA): Maintains the WDI and HWDI, as well as permit registers. The EA also issues Environmental Permits which permit the operation of waste management facilities including conditions to limit pollution events and enforces these conditions.
  - Strategic partners (e.g., Network Rail, Port of London Authority, GLA): support safeguarding and utilisation of rail/water transport capacity.

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

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

6	WLWP 1	Safeguarded hazardous waste management capacity (tpa)	Maintain sufficient hazardous waste management capacity	No net loss of safeguarded hazardous waste management capacity	Planning register; EA permit register; DM teams; HWDI.	LPAs, developers
7	WLWP 1	Nature of new development adjacent to existing waste site.	Ensure new development does not encroach on/limit potential of safeguarded existing waste operations	New development only consented with appropriate mitigation	Planning register; DM teams	LPAs, developers

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

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

12	WLWP 2	Landfill rate for biodegradable or recyclable waste (%)	Disposal to landfill as last resort for non residual waste	No biodegradable or recyclable waste sent to landfill from 2026 onwards.	WDI; Wastedataflow; WLWA Landfill Tax returns	LPAs, WLWA, Waste Industry, EA, HMRC
13	WLWP 2	Location of facilities	Facilities are in appropriate locations	100% of newly consented waste management facilities in locations described in WLWP2	Planning register; EA permit / exemptions register; DM teams;	LPAs, Waste Industry, EA

Strategic Objective 3: Decarbonise waste transport and processing

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

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

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

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

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

Appendix 2 – List of Safeguarded Sites

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

Abbreviations

- CLEUD = Certificate of Lawful Existing Use or Development
- WTS = Waste Transfer Station[45]

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

London Borough of Brent: 10 Sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
B04	Neasden Sidings, Drury Way, Wembley	Quattro Limited obo WRG (Midlands) Limited	Transfer	250,000	CDEW (Excavation)	Lawful waste use	2018	y
B05	Atlas Road Wembley	O'Hara Bros. Aggregates Limited	Non-haz Treatment	24,180	CDEW	CLEUD	2023	
B06	Unit 4, Second Way, Wembley	HAWK Rubbish Clearance Limited	Non-haz Treatment	65,575	CDEW	Temporary Planning	2015	
B07	SRC Aggregates Wembley Depot	Sewells Reservoir Construction Limited	Transfer	66,596	CDEW	Lawful waste use	2022	
B10	Unit 28, Fourth Way WTF	Brent Oil Contractors Limited	Transfer	4,903	Hazardous	CLEUD	2007	
B12	Unit 2, Hannah Close	LondonEnergy Ltd	Treatment	399,000	HIC	Permanent Permission	2021[46]	
B13	Alperton Lane Waste Transfer Station	Sortera	Treatment	300,000	CDEW/HIC/Haz	Permanent Permission	2015	
B14	Brent Transfer Station, Alperton Lane	Veolia ES (UK) Ltd	Transfer	365,000	HIC	Permanent Permission	2016	
B15	Wembley Transfer Station & Recycling Facility	Biffa Waste	Transfer	150,000	HIC	CLEUD	2002	
B16	off Great Central Way, Neasden,	L & B Haulage & Engineering	Transfer	16,696	CDEW	Lawful over time'	1998	

[46] Site was previously permitted.

		Contractors Ltd						

London Borough of Brent/OPDC: 3 Sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
B01	Twyford WTS Abbey Road	West London Waste Authority	WTS	30,003	LACW	CLEUD	1993	
B02	100 Twyford Abbey Road[47]	Bridgemarts	WTS	91,492	CDEW	Permanent Permission	Surrendered	
B08	Willesden F Sidings Rail Freight Terminal	Cappagh Public Works Limited	Transfer	10,400	CDEW (Excavation)	Permanent Permission	2018	y

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

London Borough of Ealing: 14 Sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
E01	Greenford Depot Reuse & Recycling Centre	Ealing Council	Transfer	13,268	HIC (LACW)	Permanent Permission	1977	
E02	Acton Waste & Recycling Centre	Ealing Council	Transfer	3,881	HIC (LACW)	Permanent Permission	1994	
E05	WTS Station Approach Greenford	360 Waste Limited	Non-haz Treatment	3,099	CDEW	Permanent Permission	2023	
E06	British Rail Goods Yard, Greenford	Link2london Ltd	Transfer	131,985	CDEW & HIC	Permanent Permission	2003	
E07	Horn Lane Waste Transfer Station	Quattro (UK) Limited	Transfer	17,618	CDEW & HIC	Lawful over time	1993	
E08	163-165 Brent Rd, International Trading Estate	Link2london Ltd (formerly J Simpson Waste Management)	Transfer	40,699	CDEW	Temporary Permission to 2027	2024	
E09	Stone Terminal (aka Western Regions Good Yard), 205 Horn Lane	Holcim UK Ltd (formerly Aggregate Industries UK Limited)	Non-haz Treatment	79,777	CDEW	Lawful over time	2005	
E12	London Auto Parts Alperton Lane	London Auto Parts Limited	MRS	14,013	Hazardous	CLEUD	2003	
E14	Station Approach, Oldfield Lane North, Greenford	Link2london Ltd	Treatment	10,928	CDEW	Permanent Permission	2022	

	(Haulage World WTS)							
E15	Greenford Depot (Waste Transfer Station)	Ealing Council	Treatment	101,003	HIC (LACW)	Permanent Permission	1992	
E16	Oldfield Lane North, Greenford Ocean Estate Distribution Centre	GXO Logistics FST Limited	Transfer	4,399	HIC	Temporary Permission to 2026	2023	
E18	Colville Rd	Elis UK Ltd	Transfer	1,000	Hazardous	Permanent Permission	2024	
E19	Unit 42a Sheraton Business Park,	Autofleet Salvage Limited	MRS	2,500	Hazardous	Lawful over time	2015	
E20	Land off Collett Way[48]	Wards of London Properties Ltd	Non-haz Treatment	33,117 (after B02 deducted)	CDEW/HIC	Permanent Permission	2024	

London Borough of Ealing/OPDC : 2 sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
E11	Willesden Euro Terminal	Costain Limited (Formerly Skanska Construction UK Limited)	Transfer	600,000[49]	CDEW (Excavation)	Deemed consent under HS2 Act 2017	2016	y
E13	First Mile Recycling Facility	First Mile Limited	Treatment	75,000	HIC	Permanent Permission	2017	

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

[49] See *Capacity Assessment Report* BPP Consulting October 2025 for further detail.


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London Borough of Harrow: 2 Sites

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

London Borough of Hillingdon : 23 Sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
HI01	New Years Green Lane CA Site & WTS	Hillingdon Council	WTS	75,000	HIC (LACW)	Permanent Permission	1989	
HI02	Airside Waste Sweepings Treatment Facility	Heathrow Airport Ltd	Treatment	70,000	HIC/Haz	Lawful over time	2015	
HI03	New Years Green Lane	B F A Recycling Limited	MRS	57,424	HIC	Lawful over time	2012	
HI04	WTS, Civic Way, Ruislip	B & K Environmental Services Limited	WTS	250,000	CDEW	Lawful over time	2007	
HI06	Land off Holloway Lane Harmondsworth	Foley Haulage Limited	Treatment	27,209	CDEW	CLEUD	2020	
HI07	GK Depot, Trout Road	Recycling With Skips Limited	Treatment	275,000	CDEW	CLEUD	*2018*	
HI08	Old Stockley Road, West Drayton	Hanson Quarry Products Europe Limited (formerly West Drayton Aggregates)	Treatment	35,077	CDEW	Lawful over time	2015	y
HI09	Holloway Lane Materials Recycling Facility	Powerday Plc	Treatment	63,758	CDEW/HIC	CLEUD	2002	
HI13	Skip Lane, Harvill Road	Sortera Limited (formerly Uxbridge Skip & Recycling Ltd)	Treatment	113,229	CDEW	Permanent Permission	1991	
HI14	WTS Off Rigby Lane	Talking Rubbish Waste Solutions Limited	Treatment	10,000	CDEW		2022	

HI15	Skip Lane, Harvill Road,	Thames Materials Limited (formerly Pioneer Concrete)	Treatment	766,031	CDEW (Excavation)	Lawful over time	2015	
HI16	Unit 1 Wallingford Road Recycling Facility	Uxbridge Recycling Limited (formerly A&A Recycling Ltd)	Treatment	15,760	CDEW	Permanent Permission	2012	
HI17	Crows Nest Farm	Country Compost Limited	Compost	24,900	HIC	Permanent Permission	2005	
HI18	High View Farm	West London Composting Limited	Compost	119,790	HIC	Permanent Permission	1995	
HI19	Hillingdon Clinical Waste Incinerator	Medisort Ltd	Incin	8,000	HIC/ Haz		2021	
HI20	Cranford Lane WTS, Heathrow	Heathrow Airport Limited	WTS	525	HIC	Lawful over time	1981	
HI21	Waybeards Farm, Hill End Road, Harefield	F J Heppelthwaite Solutions Limited (formerly Hep Oils)	WTS	6,451	HIC	Lawful over time	2008	
HI24	Heathrow Depot	FM Conway	Treatment	193,490	HIC/ Haz/ CDEW	Permanent Permission	2015	
HI25	Central Depot Harlington Road	Hillingdon Council	WTS	9,500	HIC (LACW)	Permanent Permission	2023	
HI27	Unit 1 & 2 Pump Lane Industrial Estate	Personnel Hygiene Services Limited	WTS	90,976	HIC	Lawful over time	1999	
HI28	Hayes Transfer Station Rigby Lane	Suez Recycling & Recovery UK Ltd	WTS	100,000	HIC	Permanent Permission	1993	
HI29	Victoria Road WTS	Suez Recycling & Recovery UK Ltd	WTS/RDF	250,047	HIC (LACW)	Permanent Permission	2014	y

London Borough of Hounslow: 10 Sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
HO01	Space Waye C A Site	Hounslow Council	WTS	20,084	HIC (LACW)	Permanent Permission	2002	
HO2	Southall Lane Western International Market	Quattro (UK) Limited	Treatment	64,347	HIC/CDEW	Temporary Permission to 2027	2018	
HO3	St Albans Farm Recycling Facility	Ron Smith (Recycling) Limited	MRS	65,415	CDEW	Permanent Permission	1993	
HO04	Norris House	Globalparts- (UK) Limited	MRS	1,128	Hazardous	Permanent Permission	2019	
HO05	Mayer Parry, Brentford	European Metal Recycling Limited	MRS	74,999	LACW	Permanent Permission	1998	
HO07	Brentford Aggregate Materials Recycling Facility	Day Group Limited	Treatment	750,000	CDEW/HIC	CLEUD	2015	y
HO09	ATS Building, Amberley Way	Rubber Recycling Solutions Limited	Treatment	12,000	HIC	Lawful over time	2023	
HO11	Southall Lane Depot	Lampton Recycle 360 Limited	Treatment	30,000	HIC (LACW)	Permanent Permission	2017	
HO13	Isleworth Site, Fleming Way Trading Estate	Citron Hygiene (UK) Limited	WTS	687	HIC/Haz	Permanent Permission	2020	
HO14	Transport Avenue WTS	Suez Recycling & Recovery UK Ltd	WTS/RDF	195,000	HIC (LACW)	Permanent Permission	1993	y

London Borough of Richmond upon Thames: 4 Sites

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

Appendix 3 – Maps of Safeguarded Sites (see Separate Document)

Included in separate document due to file size

Appendix 4 – Replacement of Policies in the West London Waste Plan

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

West London Waste Plan (2015) Policies		**Replacement Policies in the West London Waste Plan**	
Policy WLWP 1	Provision of New Waste Management Capacity	Policy WLWP 2	Provision of Additional Waste Management Capacity
Policy WLWP2	Safeguarding and Protection of Existing and Allocated Waste Sites	Policy WLWP 1	Safeguarding and Optimising Waste Site Network
Policy WLWP 3	Location of Waste Development	Policy WLWP 2	Provision of Additional Waste Management Capacity
Policy WLWP 4	Ensuring High Quality Development	Policy WLWP 4	Ensuring High Quality and Resilient Waste Facilities
Policy WLWP 5	Decentralised Energy	Policy WLWP 3	Policy WLWP3 Residual Waste Management & Energy Recovery
Policy WLWP 6	Sustainable Site Waste Management	n/a	Not applicable as issues addressed through Local Plan and London Plan policies.
Policy WLWP 7	NPPF: Presumption in Favour of Sustainable Development	n/a	No longer necessary as integrated into policies.