Submission Plan (Regulation 22)

Consultation Statement

Appendix 6: Schedule of representations received to Regulation 19 consultation

Rep No.	Respondent
01	British Land Properties Ltd (DP9, agent)
02	Canal & River Trust
03	Colne Valley Regional Park Trust
04	Day Group Ltd (Firstplan, agent)
05	Envar Composting Ltd (GP Planning, agent)
06	Environment Agency
07	Essex County Council
08	FM Conway Ltd
09	Greater London Authority (Mayor of London)
10	Harrow Monitoring Group
11	Heathrow Airport Ltd
12	Heathrow West Ltd
13	Herts & Middlesex Wildlife Trust
14	Historic England (GLAAS)
15	Hounslow Green Party (Tony Firkins)
16	L&B Holdings Ltd (Waste Planning & Permitting, agent)
17	London Borough of Lambeth
18	London Borough of Tower Hamlets
19	London Parks & Gardens
20	Marine Management Organisation
21	National Grid Electricity Transmission (Fisher German, agent)
22	National Highways
23	National Trust
24	Network Rail
25	OPDC (Delivery Team)
26	Oxfordshire County Council
27	Port of London Authority
28	Quattro (UK) Ltd – Horn Lane (Firstplan, agent)
29	Quattro (UK) Ltd – Southall Lane (Firstplan, agent)
30	Rapleys LLP (for owners of sites B02 and E20)
31	Richmond & Wandsworth Councils (Richmond Waste Service)
32	Rotherham Metropolitan Borough Council
33	RPH Town Planning (for owner of site E19)
34	Sharpe Refinery Service Ltd – Arlington Works (PMV Planning, agent)
35	Spelthorne Borough Council
36	Stockley Park landowner (Vijay Gandhi)
37	SUEZ Recycling and Recovery UK Ltd
38	Suffolk County Council
39	Surrey County Council
40	Transport for London (officer comments)
41	Waverley Borough Council
42	Westminster City Council
43	Moosa Abuelzein
44	Adham Aloka

Rep No.	Respondent
45	Paul Bacchus
46	Jacob Gilkes
47	Linda Rosemary Green
48	Mohamed Hanafy
49	Victoria Hollertz
50	Mari Honda-Wulf
51	Tony Leigh
52	Veronica G Leon
53	Reza Maleki
54	Angela Martin
55	Paul Massey
56	Pamela Esther Mayorcas
57	Ruth Mayorcas
58	Tajinder Panesor
59	Rupert Penny
60	Mary Helen Pius
61	Arjan Singh Sandhu
62	Marcin Suwała
63	Natural England - Late representation

Consultation on the Proposed Submission West London Waste Plan

From 4th August to 28th September 2026

RESPONSE FORM

The London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond-upon-Thames and the Old Oak and Park Royal Development Corporation are inviting comments on the Proposed Submission West London Waste Plan (WLWP).

The Proposed Submission WLWP sets out the proposed planning strategy for waste management in the plan area up to 2041, including identifying sites proposed to be safeguarded for waste use.

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

- Policy WLWP 1 – Safeguarding Waste Sites
- Policy WLWP 2 – Provision of Additional Waste Management Capacity
- Policy WLWP 3 – Residual Waste Management and Energy Recovery
- Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities
- Policy WLWP 5 – Recovery and Disposal of Waste to Land
- Policy WLWP 6 – Circular Economy and Resource Efficiency
- Policy WLWP 7 – Wastewater Treatment Infrastructure

This consultation is the final opportunity to comment on the Proposed Submission WLWP before it is submitted to the Secretary of State for independent 'examination in public'. We would like to hear views from our local communities, businesses and other stakeholders. At this stage in the plan making process, in accordance with the national guidance, consultation responses should focus on whether the WLWP has been developed in compliance with the relevant legal and procedural requirements, including that the plan should be in general conformity with the London Plan, and the 'soundness' of the Plan. A guidance note and answers to Frequently Asked Questions provide further detail on these terms – this document is available on the online consultation portal (via the link below) alongside other supporting information.

How to respond

All the information needed to take part in the consultation can be found on Ealing Council's online consultation portal: https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation This includes the Proposed Submission WLWP, maps and all supporting evidence. Printed copies of the Plan and key supporting documents will also be available to view at the west London Boroughs' and OPDC's main offices and selected venues in the WLWP plan area. For further information on these, please visit the online consultation portal.

You can comment on the consultation documents in the following ways:

- Online questionnaire on the consultation portal https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation
- Email a response form to WLWastePlan@ealing.gov.uk a PDF and Word version of the form can be found at

https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation . In the form, in 'Word' format you can type in your response and return it as an email attachment.

- Complete and post printed copies of the response form to the address given below. Printed copies are available at the selected locations listed on the consultation portal.
- Post written responses to:

  Planning and Infrastructure
  West London Alliance
  Ealing Council
  5th Floor, Perceval House
  14-16 Uxbridge Road
  Ealing, W5 2HL

All responses must be received by 23:59 on Monday 28th September 2026.

This form has two parts:

- Part A – Personal details and About You
- Part B – Your detailed response(s).

If you wish to comment on multiple documents or sections of the plan or supporting material, then we recommend that you download and use a separate Part B form for each comment and attach these to your postal response or email.

Part A: Personal Details		
	1. Personal Details *	**2. Agent's Details (if applicable)**
Title	[redacted]	Mr
First name	[redacted]	Hugh
Last name	[redacted]	Sowerby
Job title (where relevant)	[redacted]	[redacted]
Organisation (where relevant)	[redacted]	DP9 Limited
Address	[redacted]	[redacted] [redacted]
Postcode		[redacted]
Telephone		[redacted]
E-mail address	[redacted]	[redacted]

*If an agent is appointed, please provide the full contact details of the agent plus the person (title, name) or organisation they are acting for.

Part A: About You…	
3. Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	
[redacted]	
[redacted]	
[redacted]	
Other - please state what your specific interest in west London might be.	Landowner

Data protection

We will ensure that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure.

The Privacy Statement is published on the webpage https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

All responses will be held by the London Borough of Ealing. Responses will not be treated as confidential and will be published on its website and in any subsequent statements, attributed by name and/or organisation; however, personal details like address, phone number or email address will be removed.

If you submit comments, your consultation responses and personal data will be passed to the Planning Inspectorate and a Programme Officer. The Programme Officer manages the procedural and administrative aspects of the examination. The Programme Officer will contact you using the personal information you have provided if you have indicated in the response form your wish to engage in the Examination.

Part B: Your Detailed Response			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
See written representations regarding Hannah Close, Wembley.			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Site no./ name (see Appendices to the Plan)	B12 / Hannah Close, Wembley
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		
5. Do you consider the West London Waste Plan is:			

5.1 Legally compliant	Yes ☒	No ☐
5.2 Sound	Yes ☐	No ☒

Further information on these terms is included within the guidance note and answers to Frequently Asked Questions available on the website at https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.

See written representations

Please continue on a separate sheet / expand box if necessary.

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See written representations

Please continue on a separate sheet / expand box if necessary.

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.*

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐ **No**, I do not wish to participate in hearing session(s)	☒ **Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

See written representations

10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the West London Waste Plan.

If you do not wish to be notified of future updates on the West London Waste Plan, then please tick this box, complete Part A: Personal Details of this form and return it to us. Note your name, business (if entered) and response will still be published in the consultation report.	☐

Signature:	Hugh Sowerby	Date:	28/09/26

For electronic responses a typed signature is acceptable.

Planning Consultants

DP9

DP9 Ltd
[redacted]
Registered No. 05092507
[redacted]
www.dp9.co.uk

HS/MG/DP6312

28th September 2026

Planning and Infrastructure
West London Alliance
Ealing Council
5th Floor, Perceval House
14-16 Uxbridge Road
Ealing, W5 2HL

Dear Sir/Madam,

DRAFT WEST LONDON WASTE PLAN (REGULATION 19 CONSULTATION) REPRESENTATIONS IN RESPECT OF 2-6 (EVEN) HANNAH CLOSE, LONDON, NW10 0UX

1. Introduction

On behalf of our client, British Land Properties Limited ('**British Land**' or '**BL**'), we write to submit representations in response to the Draft West London Waste Plan ('**dWLWP**') which is being consulted on under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (the '**LP Regs**').

These representations are submitted by DP9 to the West London Alliance (the '**WLA**') on behalf of British Land in respect of Unit 2, Hannah Close, Wembley (the '**Site**'), which is identified with Facility ID B12 in the table of sites located within the London Borough of Brent ('**LBB**') listed at Appendix 2 to the dWLWP.

DP9 are also acting as planning consultants and agent to BL in connection with the proposed redevelopment of the Units 2-6 Hannah Close for which an application for outline planning permission was submitted to the LBB in December 2025 (ref: 25/3290) (the '**OPA**'), which seeks planning permission for a range of uses and would provide for the Site to form part of British Land's last-mile logistics portfolio in London. The OPA was recommended for approval by delegated authority of LBB officers on 18 August 2026.

British Land are a leading UK property company, who deliver the best, most sustainable places for their customers and communities. British Land's portfolio is focused on world class Campuses, where people and businesses can thrive, and Retail & Fulfilment, delivering formats which complement the growth of online retail. Leveraging their skillset in delivering complex, mixed-use, sustainable development and strategically located portfolio, British Land are unlocking last-mile logistics space in London – both by repurposing existing buildings, like at Paddington Central, and by building hubs into their developments. British Land's London Urban Logistics development pipeline

has a gross development value of £1.3bn which spans Greater London. British Land is the owner of the Site, which is allocated as a safeguarded waste site within the dWLWP, and this written representation is in respect of the Site only.

Following representations made by BL on 5th February 2026 during the previous stage of the plan-making process under Regulation 18 of the LP Regs in February 2026, in which BL submitted evidence to support that the Site should be removed from the dWLWP as a safeguarded waste site or, if not removed, the safeguarded capacity should be reduced to 185,000tpa.

The Site was not removed as a safeguarded waste site but, amongst other changes to the dWLWP, the safeguarded waste capacity of the Site was reduced in the dWLWP published at Regulation 19 stage to 185,000 tpa.

Building on the submissions made by BL at Regulation 18 stage, this representation reiterates the need to go further and remove the Site as a safeguarded waste site in its entirety.

2. Site Context

The Site is located at Unit 2, Hannah Close, Wembley, situated in South Brent within Stonebridge Ward. Unit 2 is currently leased to the North London Waste Authority ('**NLWA'**), who are due to vacate the Site during 2027 when they will relocate to new facilities currently under development at Geron Way within the Brent Cross Cricklewood masterplan area in the London Borough of Barnet. A plan showing the area which is understood to be subject to the proposed safeguarding within the dWLWP, comprising the existing Unit 2, is included at Appendix A of this representation (extracted from dWLWP Appendix 3).

On 28 August 2026, a major fire broke out on the Site, which reportedly required 20 fire engines and around 125 fire fighters to bring it under control[1]. The building which accommodates the waste facility was already of poor condition, as discussed further at paragraph 9 below. The impact of the fire on the condition of the existing building is currently being assessed, and further detail on the status of the existing building and implications of this will be provided once available at or prior to the examination in public ('**EiP'**) of the dWLWP. The occupier of the Site, the NLWA, who currently have a lease of the Site until, and were planning to vacate the Site, in November 2027, have now had to divert their operations elsewhere, and as a result there is no waste currently being managed at the Site. Initial indications having regard to the extent of the fire are that the building formerly housing the waste facility would need to be rebuilt and it is unlikely that the Site would be capable of repair during the term of NLWA's lease, such that NLWA could resume operations at the Site. Whether the existing building is repaired so as to be capable of future waste processing operations will be subject to further consideration, having regard to all relevant matters, including the insurance position.

The Site falls entirely within the administrative boundary of the LBB. It is located within the Wembley Growth Area, as defined in the Brent Local Plan ('**BLP'**), and the Wembley Opportunity Area, as defined in the London Plan 2021 ('**LP'**). In addition to being designated as a Safeguarded Existing Waste Site, the Site is designated as Strategic Industrial Land ('**SIL'**) (being part of an existing large-scale industrial/logistics/retail estate ('**Wembley SIL'**)), meaning its existing industrial use is

[1] Fire at Neasden waste facility affects Tube and train travel - BBC News

also protected. Development within SIL should intensify and optimise the function of industrial uses to support London's economy (see LP policies GG2, SD1, E4 and E7, discussed further below) and meet LBB's projected need of 46.9 hectares of industrial land by 2041.

The Brent Industrial Land Audit (October 2019)[2] identifies 834,486 sqm of floorspace within designated industrial sites in Brent acknowledging that in order to facilitate growth, existing sites would need to be intensified. The audit specifically notes the clear opportunities for intensification at the Wembley NW10 Site (which has SIL status and includes the Site at Hannah Close) which "*…has a low plot ratio and employment density and there are clearly opportunities for intensification*". The Site is therefore identified to be suitable for significant regeneration and transformation with a strategic policy aim of industrial intensification and the meeting of London Plan targets. This has been acknowledged by LBB officers, who concluded in their Delegated Report for the OPA that the proposed redevelopment of the Site represents a "*significant opportunity to optimise and significantly intensify the use of a designated Strategic Industrial Location within the Wembley Growth Area…..".*

In the draft London Plan 2026 (the '**dLP'**) which was published in July 2026 and which is currently undergoing public consultation, the Site is within the Brownfield First Opportunity Area ('**BFOA'**) for Wembley. Support for the intensification and optimisation of industrial uses in such locations to support London's economy is provided for in dLP policies MBUL1, MBUL2, PV1, and GLE2.

In the immediate surrounds, the Site is bound by similar large format industrial and logistics buildings and extensive service yard spaces. The Site benefits from excellent vehicular accessibility via Hannah Close with direct links to Great Central Way (B4557) which provides strategic connections to the A406 North Circular Road. This connectivity confirms the Site's suitability for industrial intensification.

3. Overview of Submissions

As indicated above, this submission makes the case that the Site should be removed from the dWLWP as a safeguarded waste site in its entirety. Its release would not compromise a significant continuing regional waste capacity surplus; the Site's location within the Wembley Growth Area and SIL mean it would provide a valuable contribution to LBB and London by being used for other industrial purposes; there is a lack of market demand for the use of the Site for waste processing and recovery, due to its size, condition and location; and the temporary NLWA operations at the Site, currently frustrated by the major fire at the Site with no prospect of resumption, would have in any event ceased next year. The rationale for the release of the Site accords with the policy tests set out in dWLWP Policy 1 and the justifications provided for other sites proposed to be released in the dWLWP.

4. Relevant legal and policy tests relating to waste local plan making

The latest version of the National Planning Policy Framework was published in July 2026 (the '**2026 NPPF'**). Annex A, paragraph 4 of the 2026 NPPF states that: *"Any local plans minerals and waste plans and supplementary plans being prepared under Part 2 of the Planning and Compulsory*

[2] https://www.brent.gov.uk/-/media/files/resident-documents/planning-and-bc-documents/eb_e_13-brent-industrial-land-audit.pdf?rev=b3f1e9b071e64b74900f72cfff4346c7

Purchase Act 2004 (as amended by the Levelling up and Regeneration Act 2023) and the Town and Country Planning (Local Planning) (England) Regulations 2026 should be produced in accordance with this Framework".

The dWLWP was produced and is being prepared under the Town and Country Planning (Local Planning) (England) Regulations 2012 (the '**2012 LP Regs'**) and subject to being submitted for examination on or before 31st December 2026 is subject to transitional provisions contained in the Schedule to the Town and Country Planning (Local Planning) (England) Regulations 2026 (the '**2026 LP Regs'**).

Accordingly, the National Planning Policy Framework published in December 2024 (the '**2024 NPPF'**) is the version in accordance with which it is required to be produced.

As detailed at paragraph 36 of the 2024 NPPF, local plans are required to be examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound, meaning that they are (a) positively prepared, (b) justified, (c) effective, and (d) consistent with national policy.

The relevant legal and procedural requirements for the making of local plans are primarily contained within and derive from Part 2 of the Planning and Compulsory Purchase Act 2004 (the '**PCPA'**). This includes requirements for the production of a local development scheme and local development documents and contains procedures for how local development documents are to be prepared, consulted on and subject to independent examination by the Secretary of State before their adoption. Further requirements for these processes are contained within the LP Regs, which are regulations made pursuant to the PCPA.

Of relevance to the dWLWP and these representations are the requirements arising from section 24 of the PCPA and regulation 21 of the 2012 LP Regs, which require that any local development documents must be in general conformity with the spatial development strategy ('**SDS**') where the relevant local authority preparing the plan are a London Borough, and that such a local planning authority must request the opinion in writing of the Mayor of London as to the general conformity of a development plan document with the SDS. That request is required to be made on the day that the relevant local planning authority comply with Regulation 19(a) of the 2012 LP Regs. Accordingly, such a request will now have been made and it is assumed that a response from the GLA is awaited. In any event, the dWLWP must be in general conformity with the SDS, which at the time of writing is the London Plan 2021. Where the dWLWP is not in general conformity with the London Plan (2021), it will not have been prepared in accordance with a relevant legal requirement.

It is relevant that the dLP (being an emerging SDS for the Greater London Area) has now been published (in July 2026) and is currently open for public consultation until October 2026, in accordance with the legal requirement for the Mayor to produce an up-to-date plan every 5 years. Examination of the dLP is intended to take place in 2027, and it is anticipated to be published and adopted in early 2028[3].

The dLP contains revised planning policies in respect of waste, and which includes information in respect of waste arisings and apportionments. Whilst the dLP is also not at a very advanced stage

[3] The next London Plan | London City Hall

and so carries very limited weight for the purposes of the consideration of the soundness of the dWLWP, the policies of relevance to waste are considered and discussed in these representations where this is of assistance to understand the regional waste capacity surplus.

In addition to the 2024 NPPF, national planning policy of relevance to the preparation and examination of the dWLWP is contained in the National Planning Policy for Waste (October 2014) (the 'NPPW'). In summary policies within the NPPW of relevance to the consideration of policies and proposed designations relating to the Site and this representation require as follows:

- In preparing local plans, waste planning authorities should:
    - ensure that the planned provision of new capacity is based on robust analysis of best available data and information, and an appraisal of options;
    - ensure that the need for waste management facilities is considered alongside other spatial planning concerns;
    - identify sufficient opportunities to meet the identified needs of their area for the management of waste streams;
    - identify the tonnages and percentages of municipal, and commercial and industrial, waste requiring different types of management in their area over the period of the plan (including that in London, waste planning authorities should have regard to their apportionments set out in the London Plan when preparing their plans); and
    - consider the extent to which the capacity of existing operational facilities would satisfy any identified need.

The London Plan 2021, aligned with the legal requirements detailed above, confirms that it is legally part of each of London's Local Planning Authorities' Development Plan and that all Development Plan Documents prepared by London Local Planning Authorities' have to be 'in general conformity' with the London Plan[4].

It is further noted in the introductory section to the London Plan 2021 that:

"*The London Plan is part of the Development Plan. The policies have been drafted in a way that allows London to implement this ambitious London Plan as soon as possible. There is no requirement for the policies to be repeated at the local level. However, in some instances a local approach is required within the context of the overall policy. The London Plan clearly sets out where this is the case."*[5]

And:

"The London Plan does not preclude boroughs and neighbourhood forums from bringing forward policies in their Development Plan Documents or Neighbourhood Plans that vary from the detail of the policies in this Plan where locally-specific circumstances and evidence suggests this would better achieve the objectives of the London Plan and where such an approach can be considered to be in general conformity with the London Plan"[6].

[4] LP Para 0.08
[5] LP Para 0.0.23
[6] LP Para 0.0.24

As such, whilst a local approach can be taken to policies in local plans, this is only where the LP clearly details this is the case, and that whilst local policies may be brought forward which vary from the detail of the policies in the LP, this is only where locally-specific circumstances and evidence supports that this would better achieve the objectives of the LP and where such an approach is in general conformity with the LP.

5. Planning policy & legislation: Waste and Industrial Intensification

The development plan documents applicable to the Site are the London Plan (2021), the adopted West London Waste Plan (July 2015) (the '**Adopted WLWP'**) and the BLP.

As set out above, the London Plan is the SDS for Greater London and so the dWLWP is required to be prepared in general conformity with it to comply with Section 24 of the PCPA and Regulation 21 of the LP Regs 2012.

As a matter of statute, the principles of proximity and self-sufficiency will also apply under Part 6 of the Waste (England and Wales) Regulations 2011, detailed below. Also of relevance is the Government's planning practice guidance ('PPG') on Waste, which provides further information in support of the implementation of waste planning policy.

(i) Waste policies

The London Plan

Policies relating to waste are contained within Chapter 9 of the London Plan 2021, which relates to Sustainable Infrastructure. Policies SI8 and SI9 are those of most relevance to these representations.

Policy SI8, in respect of waste capacity and net waste self-sufficiency, provides that development plans should (inter alia): plan for identified waste needs; identify how waste will be reduced, in line with the principles of the Circular Economy and how remaining quantum of waste will be managed; and allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste, set out in Table 9.2 to the London Plan.

With respect to the release of sites from safeguarding, supporting paragraph 9.8.6 details that surpluses in waste sites may be a reason for the release of sites from safeguarding, subject to such surplus having first been offered to any neighbouring boroughs who are facing a shortfall in capacity.

With respect to the allocation of sites to provide for the required capacity to meet apportionments, supporting paragraph 9.8.7 to Policy SI8 provides that Boroughs should:

"*examine in detail **how capacity can be delivered at the local level** and **demonstrate how this can be provided for through the allocation of sufficient sites** and the identification of suitable areas in Development Plans to meet their apportionment, and should **aim to meet their waste apportionment as a minimum**"* and that *"[w]here apportionments are pooled, **boroughs must demonstrate how their joint apportionment targets will be met**, for example through joint waste Development Plan Documents, joint evidence papers or bilateral agreements.*" (our emphasis).

Supporting paragraph 9.8.9 to Policy SI8 provides that:

"*Waste planning authorities and groups should plan to meet the identified waste management needs of their local area and are encouraged to identify* ***suitable*** *additional capacity for waste, including those waste streams not apportioned by the London Plan, where practicable."* (our emphasis).

Policy SI9 provides policy in respect of safeguarded waste sites. This policy is focused on planning decision-making in respect of safeguarded waste sites, rather than plan-making which is addressed in Policy SI8. However, it is of relevance to plan-making.

Limb (A) of Policy SI9 provides that for the purposes of decision-taking *"[e]xisting waste sites should be safeguarded and retained in waste management use",* and limb (C) identifies that "*[w]aste plans should be adopted before considering the loss of waste sites*", before continuing to detail the basis on which decisions may be taken resulting in the loss of an existing waste site which includes the provision of compensatory capacity.

With respect to the plan process, supporting paragraph 9.9.2 provides that "***Any proposed release of current waste sites or those identified for future waste management capacity should be part of a plan-led process",*** confirming that this is the primary and most appropriate basis for sites to be released from safeguarding.

Policy SI9 at paragraph 9.9.3 provides "*Policy SI8 Waste capacity and net waste self-sufficiency promotes capacity increases at waste sites where appropriate to maximise their use. If such increases are implemented over the Plan period,* ***it may be possible to justify the release of waste sites if it can be demonstrated that there is sufficient capacity available elsewhere in London at appropriate sites over the Plan period to meet apportionment and that the target of achieving net self-sufficiency is not compromised.*** *In such cases, sites could be released for other land uses."* (our emphasis).

As is noted in the dWLWP at paragraph 8.5, that paragraph is based on an assumption that the current capacity provided by existing waste sites across London is insufficient to meet the London Plan objectives and apportionments, and would suggest that in the event that there is a significant surplus and it is otherwise demonstrated that there is sufficient capacity available across London to achieve net self-sufficiency, sites may be released for other land uses. In such cases, it is clear that the compensatory capacity referred to elsewhere in Policy SI9 is not required.

Brent Local Plan

There is no dedicated policy in the BLP concerning safeguarded waste sites, although the Site is designated as such on the Policies Map and the supporting text to Policy BE2 states "*A number of sites within designated industrial sites are protected for waste purposes as identified in the West London Waste Plan and the policies map. The London Plan sets a higher waste target for Brent than previously which may mean additional sites for waste purposes will be required*".

Adopted WLWP

Adopted WLWP Policy 1 is aimed at delivering the necessary minimum amount of additional waste management capacity of the right type and at the right time. In respect of Municipal Solid Waste

('MSW') and Commercial and Industrial Waste ('C&I'), the main requirement arising out of the London Plan is to meet the stated apportionment for the six West London Boroughs combined. This is to be delivered on the allocated sites identified in adopted WLWP Policy 2. The requirement is for capacity in the re-use, recycling, and other recovery categories.

Adopted WLWP Policy 2 which protects land in existing waste management use for waste management, seeks to ensure no net loss of capacity and promotes the management of waste being moved up the waste hierarchy. For the purposes of decision-taking on applications for planning permission seeking to remove waste uses from allocated sites, the policy provides that development for non-waste uses will only be considered on land in existing waste management use if compensatory and equal provision of capacity for waste, in scale and quality, is made elsewhere within the West London Boroughs.

Statutory and policy principles of self-sufficiency and proximity

The Waste (England and Wales) Regulations 2011 (the '**Waste Regulations'**) implemented in domestic law the Waste Framework Directive (2008/98/EC) (the '**Waste Directive'**), including the principles of self-sufficiency and proximity. The Waste Regulations and these principles derived from EU law continue to apply (as amended) post Brexit. The Waste Regulations at Regulation 18 require planning authorities in exercising their planning functions in relation to waste management, to have regard to the self-sufficiency and proximity principles at Article 16 of the Waste Directive.

Under the Waste Regulations, the Secretary of State is required to ensure that waste management plans and waste prevention programmes are produced for England, and are prepared in accordance with the "principles of self-sufficiency and proximity" set out at Schedule 1, Part 1, Paragraph 4 of the Waste Regulations. These principles are that, to establish an integrated network of waste disposal and recovery of mixed municipal waste from private households:

- the network must be designed to enable the United Kingdom to move towards becoming self-sufficient in waste disposal and recovery of mixed municipal waste from private households (**taking into account geographical circumstances** or specialised installations for certain types of waste); and
- the network must enable waste to be disposed of and mixed municipal waste collected from private households to be recovered in **one of the nearest appropriate installations**, by means of the most appropriate technologies, in order to ensure a high level of protection for the environment and human health.

The PPG explains that:

"Waste planning authorities should ensure that, as far as is practicable, sufficient waste disposal facilities and facilities for the recovery of mixed municipal waste collected from households exist within their Local Plan area. ***Waste planning authorities should ensure that waste disposal facilities and facilities for the recovery of mixed municipal waste collected from households are appropriately sited to ensure compliance with the proximity principle****. This can include joint working with other planning authorities to develop an extensive network of sites to enable effective waste management"*[7]*.*

[7] Paragraph: 055 Reference ID: 28-055-20141016 Revision date: 16 10 2014

(ii) Industrial Intensification Policies

The London Plan

The London Plan 2021 highlights that making the best use of land means directing growth towards the most accessible and well-connected places, providing that "*all options for using the city's land more effectively will need to be explored as London's growth continues*" (para 1.2.5).

The London Plan Good Growth Objective GG2 promotes the optimisation of land, particularly through the redevelopment of brownfield sites.

Policy SD1 (Opportunity Areas) identifies opportunity areas as focal points for intensification; as noted above the Site is located within the Wembley Opportunity Area.

Policy E4 seeks to ensure a sufficient supply of land and premises in different parts of London to meet both current and future demands for industrial and related functions. Provision should allow for varied operational requirements, including storage logistics/distribution and 'last mile' distribution close to central London (A2), secondary materials and waste management (A3), utilities infrastructure (such as energy and water) (A4) emerging industrial-related sectors (A7), and flexible hybrid space (Classes B1c/B2/B8) to accommodate services that support the wider London economy and population (A8). Supporting paragraph 6.4.1 states that *"industrial, logistics and related uses ... are essential to the functioning of London's economy and for servicing the needs of its growing population".* Policy E4(D) notes that provision of additional industrial capacity should be prioritised in locations that are accessible to the strategic road network (1); provide capacity for logistics, waste management, emerging industrial sectors or essential industrial related services that support London's economy and population (2); and are suitable for 'last mile' distribution services to support large scale residential or mixed-use developments (4). This specifically includes an efficient storage and distribution system that can respond to business and consumer demands.

Policy E5 states that development proposals in SIL designations should be supported where the uses proposed fall within the industrial-type activities.

Policy E7 requires Local Planning Authorities to encourage the intensification of B1 (c) (now Class E (g) (iii)), B2 and B8 uses on all categories of industrial land through the development of multi-storey schemes and providing increases in industrial floorspace, having regard to operational yard space requirements.

BLP

London Plan Policy E7 is fully supported by BLP Policy BE2. BLP Policy BE2 states that the council is committed to exceeding the additional 0.6 hectares equivalent of industrial floorspace (6,000sqm) needed within the plan period delivered primarily through the intensification of existing sites.

Despite the significant targets for intensification within the Plan period, the available Annual Monitoring Reports (AMR) demonstrate the Council has lost, rather than gained industrial

floorspace, with a net loss of 2,152 sqm since 2021, increasing the Plan period target from 0.6 hectares to 0.8 hectares.

The Wembley Opportunity Area in the London Plan is described as the Wembley Growth Area ('**WGA'**) in the Brent BLP. BLP Policy BCGA1 sets the strategic context for the WGA, requiring all developments in the area to be high-quality, well connected, and sustainable to assist LBB in meeting the overarching objective for the area. The primary economic aim is to generate new jobs across a range of sectors.

6. Emerging Policy of relevance to Hannah Close

The dWLWP includes the following emerging policies:

- Policy WLWP 1: Safeguarding and Optimising the Waste Site Network
- Policy WLWP 2: Provision of Additional Waste Management Capacity
- Policy WLWP 3: Residual Waste Management & Energy Recovery
- Policy WLWP 4: Ensuring High Quality and Resilient Waste Facilities
- Policy WLWP 5: Deposit of Waste on Land
- Policy WLWP 6: Circular Economy and Resource Efficiency
- Policy WLWP 7: Wastewater Treatment Infrastructure

Of particular relevance to these representations is Policy WLWP 1, which provides the criteria against which proposals for release of a site's waste safeguarding allocation will be assessed.

The draft Policy WLWP 1 provides a detailed definition of existing safeguarded waste sites, including identified sites within the dWLWP (unless identified for release) and sites subject to planning consent or CLEUDs for a waste use, or deemed lawful in planning terms (this is a departure from the London Plan 2021 definition). The policy notes that where safeguarded waste sites are proposed to be redeveloped for waste uses, the capacity of the redeveloped site should provide equal to, or more than, the assessed waste management capacity of the existing site (as identified in Appendix 2 of the dWLWP); unless it will demonstrably result in waste being managed further up the waste hierarchy.

The criteria for release of safeguarded waste sites for non-waste uses is set out at paragraph F of dWLWP Policy 1. Replacement capacity will be determined at the time of an application for redevelopment, the starting point being the assessed waste management capacity of the existing site as set out at Appendix 2 (or any subsequent assessment). Replacement capacity must be equivalent to or above the level of waste hierarchy as the capacity proposed to be lost. The draft policy then specifies that, in certain instances, the following factors will be given 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 or bespoke environmental permit;
- reported throughput (based on Environment Agency Waste Data Interrogator ('WDI') or equivalent data source), and
- wider market conditions.

The supporting text to dWLWP Policy WLWP 1 at paragraph 8.19 provides guidance on assessing "*wider market conditions*":

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

The paragraph F factors are plainly relevant when considering the removal of a site from the dWLWP.

This is made clear in the London Plan which provides that "*Any proposed release of current waste sites or those identified for future waste management capacity should be part of a plan-led process*"[8].

It is incumbent, therefore, on the West London Local Planning Authorities (the '**WLLPAs'**) to apply these same factors to the consideration of the release of existing sites within the WLWP during the plan preparation process for the dWLWP (which this representation does below).

Applied to the Site, the following factors at paragraph F of Policy WLWP 1 justify its release from safeguarding:

(i) the **site's particular circumstances**, considering its condition and impact of the recent fire, meaning that it is not currently in use as a result, and the Site's location within the Wembley Growth Area and SIL; and
(ii) that as a result of the '**wider market conditions**' (applying the factors and assessment at paragraph 8.19) there is an evidenced lack of demand and the Site is unlikely to be in use as a waste facility in the future, discussed further at paragraph 9 below.

Lastly of note to the Site, paragraph H of draft Policy WLWP 1 which provides that *"Railheads and wharf capacity for waste transportation associated with a safeguarded waste site will be safeguarded for waste use where it this does not conflict with other existing or planned uses. In the event that the existing waste site ceases to be safeguarded for waste use, the safeguarding of the associated railhead or wharf for waste transport will also cease."*

Following the representations at Regulation 18 stage, this paragraph has been updated (as underlined) to distinguish that whilst the safeguarding of the associated waste transportation use of the railhead/wharf will cease, the safeguarding of its capacity for other uses may continue to apply.

[8] LP paragraph 9.9.2

Within the supporting text to draft Policy WLWP 2 at paragraph 8.21 of the dWLWP it is identified that the most recent capacity assessment (which is discussed further below) prepared by BPP Consulting[9] demonstrates that there is "*sufficient existing capacity in west London for current and forecast future waste arisings within the Plan area, plus that apportioned via the London Plan to be managed appropriately.* ***Therefore, there is no identified need for development of additional capacity within the Plan area for the Plan's objectives to be met. The capacity of sites to be safeguarded for waste use 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*".

The text extracted above indicates that there is no need for additional capacity to be developed within the Plan area which is surplus to the capacity required to meet current and future waste arisings within the WLWP area. Any surplus to requirements could only therefore be justified where of an amount which reasonably accounts for increases to London Plan apportionments for the relevant boroughs. This is discussed in further detail in the analysis on surplus capacity against LP (and dLP) apportionments, at paragraph 10 below.

The dWLWP Policy 2 removes reference to specific tonnage within the plan period, as is referenced in Adopted WLWP Policy 1. Rather, the draft policy supports development proposals that can establish either that they demonstrate a specific need of waste arising within West London; are for capacity which would provide for management further up the waste hierarchy; or involve the reuse, repair and remanufacturing activities, including via Circular Economy Hubs which are introduced to the policy, assessed to constitute waste development. This suggests a shift in safeguarded land being used for the management of waste to converting waste for other life-cycle uses. The policy supports the provision of waste capacity sites within SIL locations, provided they do not compromise the Site designation in the development plan for non-waste development.

dLP Policies

The following draft policies in the dLP are of relevance on Waste and Industrial Intensification. As a starting point, it is noted that the dLP is guided and prepared on the basis of the "Good Growth Principles" set out at Chapter 1 of the dLP. These include (amongst others):

- **Making the best use of land**, including by ensuring that "*infrastructure better addresses existing needs and supports good growth in a timely, space-efficient and cost-effective manner*". The dLP justifies this objective explaining that land is scarce and finite, and the planning process has responsibility for ensuring that land use is optimised to deliver requirements, including economic activity; and

- **Growing London's economy in a way that benefits all**, including by securing sufficient space and infrastructure to enable economic activity to grow. The justification for this objective in the dLP is that planning needs to help unlock a range of premises for uses including office, industrial, and the growing demand for data centres.

[9] Proposed Submission West London Waste Plan: Assessment of Existing Waste Capacity in West London prepared by BPP Consulting, updated July 2026.

dLP Policy GLE12 (Waste) provides that development plans should plan for sustainable waste management in London including for net self-sufficiency in line with the proximity principle[10]; and that development plans should also plan for the managing and reduction of waste through a combination of protecting waste sites, identifying suitable new sites, and reprovision by ensuring that, amongst other things, "*provision is sufficient to manage the apportioned tonnages of materials and waste, as set out in Table 4.3".* Table 4.3 of the dLP is discussed in further detail in the analysis at paragraph 10 below.

Wembley is included as a BFOA within the dLP, at draft Policy PV1[11]. This draft policy states that Local Plans should help to realise strategic growth in BFOAs, in line with draft Policy MBUL2 (Optimising the use of land and site capacity) and the indicative capacities for homes and jobs (in Annex E); and that plans should, with reference to the strategic growth visions in Annex E, identify the conditions required to allow development to come forward and address these in site allocations, spatial policies, and prioritised interventions.

The vision for Wembley includes that "*With most development now complete or underway, the focus should now be on stitching together fragmented sites, supporting industrial land typologies and interfaces and enhancing public realm*" and that "*development should manage transitions between residential, commercial, and industrial uses with care and also explore opportunities for intensified typologies*"[12].

Draft Policy PV1 sets strategic principles for plans and proposals relating to or in BFOAs, including supporting SIL and industrial capacity, while considering appropriate opportunities for intensification, except where it forms part of areas identified for release of industrial land to support housing growth under draft Policy PV5.

dLP Policy MBUL1 (Spatial Strategy) identifies at paragraph A that, in relation to development management and plan-making, new employment development and infrastructure investment should be located and designed to, amongst other things, achieve intensification of land use across London in a way that contributes to meeting London's different needs, and supports places to renew and evolve, responding positively to London's place assets, and building on the success of economic clusters. Paragraph B of MBUL1 states that local plans should plan to deliver appropriate infrastructure, including through site allocations and review of designations, giving priority to and realising the full potential of certain areas including BFOAs, addressing their specific strategic opportunity where relevant.

dLP Policy MBUL2 (Optimising the use of land and site capacity) aims to ensure development makes the best use of land and make the most of opportunities on brownfield land.

dLP Policy GLE2 (Supply of industrial land) states that plans should seek to "*provide for and maintain sufficient industrial capacity to meet strategic needs in the most suitable locations with good freight transport access*".

7. Site History

[10] dLP GLE2 Para A.
[11] dLP Policy PV1 Figure 6.1, ELP Annex E
[12] dLP Annex E

The Site comprises Unit 2 Hannah Close, which is currently subject to a lease to, but for reasons already explained is not currently in use, by the NLWA.

The Site received planning consent for waste management use in 2009 permitting a materials recovery facility (MRF) installation and a combined heat and power biomass plant[13]. Whilst some development has been undertaken on the land referable to this planning permission, being a building to house the materials recovery facility, significant elements of the development, notably the 2.5 MW biomass combined heat and power plant which would have received waste as fuel for the production of energy, were never constructed.

As established in the Regulation 18 dWLWP consultation, the Site's assessed throughput capacity is 185,000 tpa. In turn in the Regulation 19 dWLWP, the Site's allocated capacity has been updated to 185,000 tpa.

The Site has not been in operation since the fire in August 2026. The impact of the fire on the condition of the existing building is currently being assessed. Whether the existing building is repaired so as to be capable of future waste processing operations will be subject to further consideration, having regard to all relevant matters, including the insurance position.

8. Surplus Capacity Analysis

As set out above, at Regulation 19 stage, the assessed capacity of the Site is 185,000 tpa.

The dWLWP identifies that West London's current qualifying waste management capacity for HIC Waste is approximately 2.60 million tpa, which, removing the capacity of the existing waste sites ('EWS') proposed for release in the dWLWP[14], exceeds the London Plan forecast arisings in 2041 by 357,711 tpa[15] (circa 16%)[16]. Where the assessed capacity of the Site is removed from this surplus, there would continue to be a surplus in West London of 172,711 tpa (circa 7%).

Alignment of the dWLWP with London Plan apportionments

The London Plan identifies a need for 8,726,000 tpa of capacity for HIC waste across the plan period to 2041. To deliver this capacity, the tonnage is apportioned for delivery across the London boroughs. The purpose of the allocation apportionment is to make sure that London delivers its

[13] Permission ref: 09/2245 (as amended by non-material amendment approvals ref: 10/3299 in 2011 and ref: 16/0878 in 2016).
[14] Regulation 19 dWLWP, Appendix 6
[15] Regulation 19 dWLWP, paragraph 7.2
[16] It is noted that there is a discrepancy between Table 2 of the dWLWP (which shows surplus of 357,711 tpa against LP 2041 apportionment, and Table 4 of the BPP Capacity Assessment (July 2026) which shows HIC waste surplus of 306,744 against LP 2041 apportionments, which removing the 6 sites proposed for release in the dWLWP, leaves a surplus capacity of 288,098. Explanation is requested from the WLLPAs as to the correct surplus calculated for HIC waste capacity in West London against London Plan forecast arisings for 2041, and how this figure has been arrived at. Removing the Site from the assessed capacity figure in the Capacity Assessment, leaves a surplus of 103,098 tpa (circa 4%).

objectives of net self-sufficiency, whilst appreciating the variances of deliverability of waste management infrastructure across London.

The boroughs within the WLWP area are required to identify capacity for the delivery of 2,221,000 tpa of HIC waste in accordance with London Plan apportionments. The dWLWP demonstrates that beyond the capacity they are required to deliver through the GLA apportionments, the plan provides a significant surplus of allocated capacity.

The London Plan expects boroughs to offer any surplus capacity to neighbouring London boroughs that may be facing a shortfall (LP, para 9.8.6) before considering the release of existing sites from waste use in circumstances of a surplus.

The dWLWP notes (at para 7.8) that the WLLPAs have engaged with London Boroughs that have identified unmet needs, and continue to do so, and that it is noted that significant tonnages of waste that arise outside of the WLWP area are already being managed within the WLWP area.

Table 1 below identifies the HIC apportionments, capacity gaps, and surpluses, across all the London boroughs. This information shows that across the London boroughs as a whole, there is a very significant surplus of capacity for HIC waste and, as such, there is not expected to be reason for any demand from other London boroughs for the surplus arising within West London.

Borough	**2041 Apportionment (Ktpa)**	**Region**	**Surplus Identified**	**Position on Capacity**
Brent	437	West London Waste Authority	16% 2041	The Reg 19 dWLWP at Table 2 identifies a surplus of 357,711 of assessed capacity forecasted for 2041 in West London – 16% of additional allocated capacity[17].
Ealing	576			
Harrow	170			
Hillingdon	449			
Hounslow	432			
Richmond	157			
Sub total	**2211**			
Barking & Dagenham	537	East	42% in 2041	The draft East London Waste Plan (Reg 19) provides 2,619,508 tonnes per annum (tpa) of

[17] As at footnote 16 above, there is a discrepancy with the surplus identified in the most recent Capacity Assessment report (July 2026) supporting the dWLWP which identifies a surplus of 306,744 tpa in 2041.

Havering	393	London Waste Authority		waste management capacity for apportioned household, industrial and commercial waste in East London, after the proposed release of sites. This provides a surplus capacity of 1,122,508 tpa to manage the London Plan apportioned forecast arisings to 2041 (~42% surplus).
Newham	407			
Redbridge	160			
Sub total	**1497**			
Barnet	229	North London Waste Authority	Net self-sufficient	With the North London Waste Plan (Adopted 2022) capacity apportionments for North London are met through both existing capacity and the allocation of additional land to ensure 100% net self- sufficiency.
Camden	141			
Enfield	379			
Hackney	118			
Haringey	203			
Waltham Forest	211			
Islington	108			
Sub total	**1389**			
Bexley	485	South East London Joint Waste Planning Group	68% in 2041	Through SELJWPG's individual Local Plans and other DPDs, sufficient sites have been identified, which, when pooled, collectively meet the London Plan waste capacity apportionment requirements for the sub-region. In addition to this, surplus capacity exists to allow the sub-region to respond to any uplift which gives additional security for future capacity and allows the release of waste sites for other uses where this contributes to sustainable development. Once REP is fully operational, there will be significant surplus - 1,162,982 tpa (approx. 68%).
Bromley	204			
City of London	200			
Greenwich	359			
Lewisham	195			
Southwark	159			
Sub total	**1602**			
Croydon	268	South London Waste Plan	1.4% in 2041	Within the South London Waste Plan (Adopted 2022) there is a 13,110 tpa surplus of waste management capacity beyond their apportionment, a 1.4% surplus. South London Waste Plan figures based on London Plan 2021, with apportionment to 2037.
Kingston	199			
Merton	253			
Sutton	224			
Sub total	**944**			

Wandsworth	280	Local Plan Adopted 2023	Net self-sufficient	Commitment to meet capacity cap and deliver apportionment allocation through identification of sites within Wandsworth.
Hammersmith & Fulham	223	LOCAL PLAN Reg 18 - planning capacity to 223ktpa 2041	Net self-sufficient	The Local Plan is at Reg 18. As part of this they plan to provide capacity of 223ktp.
Lambeth	152	Local Plan adopted 2021	Net self-sufficient	Commitment to meet apportionment through existing capacity and allocation of new land.
Kensington & Chelsea	123	Local Plan adopted July 2024	-	The borough relies upon established agreements with LBHF and OPDC to deliver capacity.
Tower Hamlets	207	LB Tower Hamlets Local Plan 2031 (Adopted 2020)	Net self-sufficient	Tower Hamlets can meet its apportionment targets through existing sites and identifying enough land suitable for new waste facilities.
City of Westminster	200	City Plan Adopted 2021	-	Westminster have reached an agreement with the London Borough of Bexley to use part of its surplus capacity to meet Westminster's 2.3% waste apportionment targets (LACW and C&I waste streams) as set out in the London Plan.

Table 1: HIC apportionments, capacity gaps, and surpluses across London Boroughs

Whilst some surplus headroom is prudent, the current over allocation across London, which totals 2,656,311 based on the dWLWP figure[18], is very clearly excessive, unjustified in policy terms, and unarguably results in the sterilisation of land better placed for industrial intensification.

As discussed further below, the dWLWP proposes to release six existing waste sites where local authorities have determined that waste capacity remains sufficient (indeed there is a significant surplus) and that releasing these sites contributes to achieving wider planning and regeneration objectives.

The proposed release of sites demonstrates that the NLWAs recognise the need to release sites in the context of the surplus and that the retention of excessive waste allocations would otherwise hinder the delivery of strategically important regeneration and industrial intensification, preventing optimisation of development on key brownfield land. Even with the release of these six sites, a substantial regional surplus waste capacity would still exist. The logic for further release remains to comply with the need for intensification of industrial sites identified in the SDS.

Further there is specific justification in relation to the Site itself. As set out above, applying the factors for determining whether a site is justified for removal at dWLWP Policy 1 (F), it is clear that release of the Site's waste allocation would be justified.

Further, if and once the Site is added to the list of sites for release, there would still be surplus waste capacity within the allocation and so its removal would not be prejudicial to meeting waste needs.

In turn, adding the Site to the list of sites to be removed from allocation in the dWLWP would ensure that the dWLWP simultaneously accommodates for the appropriate amount of waste capacity as well as the need for industrial intensification in accordance with London Plan requirements, noting there is a live application for the Site seeking significant intensification.

<u>Capacity Shortfalls – Westminster and Tower Hamlets</u>

Responses were received at Regulation 18 stage from Westminster City Council and from the London Borough of Tower Hamlets, requesting that they should be considered in for surplus allocations to address their shortfalls in waste management capacity.

Westminster CC raised concerns with their current lack of waste capacity, exported to other authorities areas, and that this does not account for their apportioned waste by 2041 in the London Plan of 200,000 tpa. Westminster note that they currently have an arrangement with LB Bexley for management of their C&I waste, which will soon cease, and that they will need to seek assistance from neighbouring local authorities to meet London Plan HIC apportionments.

Whilst not being a proximate neighbouring authority to the West London Boroughs, the London Borough of Tower Hamlets have identified a shortfall of HIC waste management capacity, and have requested a transfer of 192,370 tpa of HIC waste capacity.

[18] As at footnotes 16 and 17 above, there is a discrepancy with the Capacity Assessment surplus figure for West London, which shows a surplus of 306,744 tpa. Based on the Capacity Assessment figure there would be a total surplus of 2,605,344 tpa for London.

In line with the proximity principle enshrined in the Waste Regulations, Tower Hamlets' demand would be more appropriately addressed in neighbouring boroughs in East London, with the most significant identified surplus of 1,122,508 tpa to manage London Plan apportioned forecast arisings in 2041, South East London, which has a significant surplus of approximately 1,162,982 tpa, and also South London which has an identified albeit smaller, 13,110 tpa surplus.

Equally, for Westminster, shortfalls appear to be capable of being met by other London Boroughs within these areas which are more proximate to need, existing established waste collection and waste transfer arrangements with the London Borough of Bexley in the south-east of London, and have a greater surplus. We also anticipate the sites which could meet Westminster's processing needs would not have the same compelling circumstances as the Site does for release from waste safeguarding. Even if there were a strategic case for West London to provide waste processing capacity for Westminster CC, it would not be sound to rely on the Site which, in its current condition and circumstances following the fire, would not be able to readily meet any soon waste processing requirements in the short term or, for the reasons explained below, in the future more generally.

dLP: Forecasted Waste Arisings and Apportionments

The waste data within the London Plan remains extant, however dLP draft Policy GLE12 (at table 4.3) contains revised waste apportionment and arising figures for the London Boroughs.

The revised data shows generally increasing regional waste apportionments alongside increased waste arisings, resulting in a net self-sufficiency for the greater London region as a whole. The updated figures show that the West London authorities have a significant regional surplus of allocation against the forecast waste arisings in 2040 of 413K Tonnes. This is more than, but also broadly similar to, the 357,711 tpa surplus identified against the 2041 apportionments identified at Table 2 of the dWLWP and identifies that it is expected the West London Boroughs may have a greater surplus of waste capacity in the future.

However, dLP waste arisings result in a 5.4% increase in the assumed waste arisings for Greater London as a whole. The basis of this increase from the arisings forecast within the 2021 plan is not explained, with no underlying data with respect to the apportionment and arisings figures having been published by the GLA. The data also results in some significant variances at the individual London Borough level waste arising forecasts. The basis for the changes to the apportionment and arisings figures will require thorough examination as part of the plan-making processes for that plan.

9. Demand Analysis

Current and anticipated future market conditions for waste processing

As outlined above, the NLWA have been utilising the Site as a waste transfer station for the last 5 years. This has been a 'temporary' arrangement whilst a new waste transfer station at Geron Way within the Brent Cross Cricklewood masterplan area for NLWA is delivered. This new waste transfer station has been consented and is currently being constructed, programmed for NLWA to transfer operations from the Site to these new facilities in November 2027. Prior to this time, despite being allocated and having planning consent, the previous operator Seneca, failed to sustain a successful

permanent waste management operation leading to the transfer of the environmental permit for the Site.

Despite British Land engaging in discussions regarding the potential for more permanent operations on the Site, the London Borough of Barnet opted against this for reasons of viability and costs, and had separately agreed and resolved to return to new facilities in Brent Cross back within the North London Waste Authority Area. As such, it is anticipated that the NLWA will vacate the Site during 2027. After this date, there are no arrangements for any waste to be managed on the Site. With knowledge of the position of NWLA and that the Site is safeguarded for waste use, British Land has been active in seeking potential other occupiers for waste operations on the Site.

In September 2026, British Land commissioned Knight Frank to undertake a waste market survey to consider the up-to-date position on the demand for potential occupiers and operators of the Site from the waste industry. Knight Frank contacted approximately 20 waste operators and waste industry participants by phone to assess their interest in taking a lease of or occupying the Site (the '**Survey'**). Participants included major waste operators, various individual waste providers and independent waste management companies and industry specialists. Responses were received from 15 participants, (including Suez, Powerday, Veolia, Viridor, SRC Group, O'Malley, Panda Beauparc, Biffa, Sylvagen Limited, Biel Skips, Glynn's Skips, Mick George and independent waste industry specialists) which are anonymized below.

The Survey was undertaken using the following assumptions:

(i) The Site and existing buildings are fit for purpose.
(ii) The Site benefits from an operational rail connection.
(iii) The Site is capable of handling approximately 185,000 tonnes of HIC and/or construction, demolition and inert (CD&I) waste per annum.
(iv) The level of the current passing annual rent paid by NLWA, was assumed.

It should be noted in respect of the assumptions at (i) and (iii) above, that the Survey did not take into account the extent of the damage caused by the recent fire at the Site. In respect of the assumption at (ii), whilst there are railway sidings at the northern boundary of the Site these are not in operation, nor anticipated to be, as discussed further at paragraph 10 and at Appendix B of these representations. These circumstances affect the validity of these assumptions and in turn, the results in terms of the attractiveness of the Site to the waste operators surveyed should be considered on a qualified basis.

Responses have been received from 15 of those surveyed, and further responses are awaited. From the responses received to date, there is no identifiable demand from prospective occupiers to conduct waste operations at the Site at its current passing rent level.

The majority of responses referenced the existing passing rent level as a reason why they or operators in the waste industry more generally would not be able to operate from the Site. Additional viability concerns such as business rates and insurance, operating costs, environmental permitting costs were also cited, as well as substantial costs likely required for plant, machinery and site infrastructure before operations could commence. Further, participants highlighted limited availability of capital for new waste facilities and the challenges associated with securing investment for speculative ventures.

Various operators indicated that they would only consider the site if supported by a long-term local authority waste contract or another form of guaranteed waste stream capable of underpinning the fixed cost base.

Many respondents noted that they did not have a requirement for a facility of that amount of capacity in the area. One response noted the issue that there are limited offtakes (landfill / incineration), and if they were going to utilise the rail link (which, as noted above, was subject to the assumption that this was operational, whereas it is not and there is no viable prospect of it being so in the future) they would need an additional 1,000 tonnes per day (equal to 1 train load).

The viability concerns raised by respondents were raised notwithstanding the impacts of the fire. The passing rent assumed was based on the current building which accommodated NLWA, which has now been damaged to an extent that it is anticipated it will require rebuilding before it may be possible to support the operation of a waste facility.

The lack of demand for the Site has been evidenced to be unchanging for multiple years. The Knight Frank survey was commissioned to provide up to date analysis of the market demand for the Site, following a previous market testing exercise by CBRE in September 2024. This involved talking directly with all major waste operators across London, including larger national waste management companies such as Suez, Veolia & Biffa, as well as more localised operators such as P.B. Donoghue and Wards of London. A response rate of 89% was achieved from all operators contacted. All operators who responded to the request for interest in the Site in the CBRE survey confirmed that they had no interest in operating from the Site, due to existing capacity and the potential to expand operations either at their own sites, or other operational sites across North and West London.

It should also be noted that the current waste transfer station building on the Site was in a condition prior to the fire, such that it would not have been possible to put an institutional lease on the building.

The condition of the existing building on the Site is now being further assessed following the major fire at the Site in August 2026. As noted above, further detail on the status of the existing building and implications of this will be provided once available at or prior to the EiP of the dWLWP.

Even prior to the major fire at the Site, significant investment / redevelopment would have been required for a permanent waste operation to be operated from the Site, which reduces its attractiveness to operators in the market having regard to the costs involved and significantly reducing the feasibility of future waste operation due to viability in addition to a surplus of supply.

As indicated by the Survey, the facility is unviable as a private sector investment and would require public funding; a position which is aggravated by the impacts of the fire. A new building would need to be constructed on Site to accommodate the waste facility, generating higher rents to cover the costs of construction of the structure alone. This would likely be exacerbated by the increased costs of fitting out, considering regulatory requirements including MEP systems and fire protection infrastructure.

Further, any new waste facility at the Site would need to meet the highest practicable environmental standards as confirmed by dWLWP Policy WLWP 4, which would be a relevant factor in respect of the costs involved in reconstruction and viability to a new occupier.

Accordingly, all of the available information in respect of market conditions and demand for the Site for waste processing and wider market conditions evidences that there is not a realistic prospect of any such operations being established at the Site in the future.

10. Representations in respect of the removal of the site from the WLWP as a Safeguarded Waste Site

The dWLWP is required to conform with the London Plan, in particular Policy SI8, which provides that:

- In order to manage London's waste sustainably the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026, and where necessary to achieve this existing waste management sites should be safeguarded, and the waste management capacity of existing sites should be optimised; and
- To achieve this, development plans should (inter alia) plan for identified waste needs and allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste, as set out in Table 9.2 of the London Plan.

What the London Plan Policy SI8 does not do, in any way, is require nor advocate for, any significant surplus of capacity as compared to the apportioned tonnages of waste identified in the London Plan.

This would be contrary to the policy requirement for a sufficient number of sites to be allocated to achieve net self-sufficiency. It is acknowledged that there will be some surplus to prudently plan for a reasonable worst case and protect the ability to achieve the sustainable management of London's waste, but any significant surplus level would go beyond this and would not be in conformity with the London Plan, particularly when having regard to tensions this gives rise to with other London Plan policies such as the encouragement of industrial intensification, considered further below. This is recognised in the dWLWP by the proposal to remove some safeguarded sites.

In the context of London Policy SI8 and also SI9, the dWLWP identifies the purpose of the Policy WLWP1 to be "*protecting, enhancing and optimising the existing network of waste sites so that sufficient suitable waste management capacity is provided for the Plan period*...". The introductory text goes on to state at paragraph 8.5:

"8.5 The London Plan 2021 allows for the redevelopment of existing waste sites for non-waste uses providing an equivalent amount of replacement (or compensatory) capacity is provided. There is also a provision in the London Plan that allows for site release without replacement capacity being provided where it is demonstrated there is already sufficient capacity to allow the London Plan apportionments to be met and the capacity that would be lost is not required to ensure net self-sufficiency is met. This is based on capacity increases at waste sites being implemented over the Plan period[19], which in turn is based on the assumption that the capacity provided by existing waste sites across London is insufficient to meet the London Plan objectives and apportionments.".

[19] London Plan 2021 paragraph 9.9.3

It is also noted that:

- Paragraph 8.7 of the dWLWP provides that "*This Plan proposes to safeguard waste management capacity based on the assessed capacity of existing waste sites, rather than solely on the five-year peak recorded input. This is in order to avoid an incremental loss of waste management capacity over the Plan period within the context of strong development pressure from competing land uses across west London"* acknowledging that there is a clear need for other uses to be delivered on land in West London, for which there is strong pressure (demand);
- The dWLWP together with the waste local plans for London as whole, would allocate sites resulting a surplus of capacity equivalent to c.2.66 million tpa, significantly in excess of what is sufficient for London to achieve net waste self-sufficiency;
- On the basis of the dWLWP figures, where the Site is removed there would continue to be a significant surplus; and
- There is no recognition in the dWLWP that any proposed release of current waste sites or those identified for future waste management capacity should be part of a plan-led process.

As has already been established in this representation, dWLWP1, in addition to including policy relating to the safeguarding of existing waste sites, also includes policy identifying the basis on which it would be appropriate for sites to be released from safeguarding where they are surplus to requirements. And as has been identified already, in the context of the London Plan identifying that the plan process is where sites should first be considered for release from safeguarding, it is incumbent upon the WLLPAs to apply the policies that the dWLWP includes relating to release to the consideration of the release of existing sites within the WLWP during the plan preparation process for the dWLWP.

<u>Surplus</u>

Considering paragraph 8.5 of the dWLWP and the analysis of surplus capacity above, it is beyond any question that the Site has been shown to be surplus to capacity requirements within the dWLWP. Accordingly, the Site could be released for other land uses, and the WLLPAs must consider the Site for release.

<u>dWLWP Policy 1 factors</u>

As set out above, dWLWP Policy 1 identifies, at paragraph F that, in determining the release of safeguarded waste sites for non-waste uses, certain instances, the following factors will be given 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 or bespoke environmental permit;
- reported throughput (based on the Waste Data Interrogator or an equivalent data source), and;

- wider market conditions.

Those identified relevant considerations are addressed below in relation to the Site:

<u>The Site's particular circumstances (including allocation within a Local Plan for an alternative use)</u>

The Site is located within the Wembley Opportunity Area and the Wembley SIL and therefore presents a significant opportunity for redevelopment for industrial uses to serve LBB and London. Continued waste safeguarding of the Site would undoubtedly compromise this strong policy support for industrial intensification at this location.

The primary economic objective of the Wembley SIL and the Wembley Opportunity Area is to intensify industrial floorspace and generate diverse employment opportunities. As such, safeguarding the Site for waste use very arguably prevents its optimal use in alignment with development objectives set out in the Development Plan.

Moreover, the Site is subject to the following planning policies promoting the optimisation and intensification of valuable industrial uses, which are in tension with the continued safeguarding of the Site:

- London Plan Policy SD1 (Opportunity Areas) which identifies opportunity areas as focal points for intensification;
- London Plan Policy E4 (Land for industry, logistics and services to support London's economic function) which seeks to ensure a sufficient supply of land and premises in different parts of London to meet both current and future demands for industrial and related functions, and which also identifies in supporting text that "*industrial, logistics and related uses ... are essential to the functioning of London's economy and for servicing the needs of its growing population", and that additional industrial capacity should be prioritised in locations that are accessible to the strategic road network; provide capacity for logistics and emerging industrial sectors or essential industrial related services that support London's economy and population; and are suitable for 'last mile' distribution services to support large scale residential or mixed-use developments;"*
- London Plan Policy E5 (Strategic Industrial Locations) which states that development proposals in SIL designations should be supported where the uses proposed fall within the industrial-type activities;
- London Plan Policy E7 (Industrial Intensification, co-location and substitution) which requires Local Planning Authorities to encourage the intensification of B1 (c) (now Class E (g) (iii)), B2 and B8 uses on all categories of industrial land through the development of multi-storey schemes and providing increases in industrial floorspace, having regard to operational yard space requirements; and
- BLP Policy BE2 (Strategic Industrial Locations and Locally Significant Industrial Sites), which states that the council is committed to exceeding the additional 0.6 hectares equivalent of industrial floorspace needed within the plan period.

The Site has very strong planning policy support and significant potential for intensified industrial development in the near future, including when having regard to the Site's excellent vehicular accessibility via Hannah Close with direct links to Great Central Way (B4557), which provides strategic connections to the A406 North Circular Road. This connectivity further confirms the Site's

suitability for industrial intensification, and in particular logistics uses (including last-mile logistics within London).

Noting BLP Policy BE2, the Council's Annual Monitoring Reports demonstrate a net loss of industrial floorspace of 2,152 sqm up to 2023 (last available data), against a target of 6,000 sqm net additional floorspace within the Plan Period.

The continued safeguarding of the Site therefore conflicts with and would act to prevent the redevelopment and use of the Site for alternative uses which are otherwise strongly supported by planning policy. There are, therefore, particular circumstances that point to the release of the Site for purposes supported by the London Plan.

Further, the dLP, whilst emerging policy, also would point towards support of the industrial intensification of the Site. In the dLP, Wembley is designated as a BFOA, and draft Policy PV1 supports industrial intensification in BFOAs.

dLP Policy MBUL1 (Spatial Strategy) also supports intensification of land to respond to needs across London. Paragraph B of MBUL1 states that local plans should plan to deliver appropriate infrastructure, including through site allocations and review of designations, giving priority to and realising the full potential of certain areas including BFOAs, addressing their specific strategic opportunity where relevant. This is further supported by dLP Policy MBUL2 (Optimising the use of land and site capacity) which aims to ensure development makes the best use of land and make the most of opportunities on brownfield land.

In terms of the possible alternative uses of the Site:

- dLP Policy GLE2 (Supply of industrial land) states that plans should seek to "*provide for and maintain sufficient industrial capacity to meet strategic needs in the most suitable locations with good freight transport access*" ; and
- dLP Policy GLE3 (Data centres) states that suitable locations should pro-actively be identified in local plans for data centres to meet need, taking into account certain locational criteria, including "*Availability of land without compromising the supply to meet local housing needs as well as employment and infrastructure needs that depend on freight transport infrastructure*".

It is also relevant when considering the particular circumstances of the Site to note that the NLWA has occupied the Site as a temporary waste transfer station for five years and is scheduled to relocate to a new facility in Brent Cross in September 2027, at which point the Site would be vacant. Moreover, it is relevant that as explained above, the Site would require significant investment / redevelopment to be capable of waste operations in the future. The impacts of the fire at the Site in August 2026 remain under assessment, but as a result there is currently no building on Site which could accommodate the waste facility and this would need to be rebuilt.

<u>Wider Market Conditions</u>

There is clear evidence that the Site has never achieved a sustained period of successful and permanent waste operations. The available evidence of throughput at the Site, from which reasonable conclusions can be drawn, identifies that the original operator Seneca were not able to

sustain a successful operation, seeing declines in throughput towards from the point of first operation, before a significant drop-off in 2020, which it can be understood led to them transferring the Environmental Permit and exiting from the Site. Since then, whilst NLWA have had relatively well sustained operations, those operations have been on a temporary basis, relate to processing waste from within the North London Waste Authority Area, and will come to an end in 2027 when NLWA relocate back to the Brent Cross Cricklewood masterplan area. It remains to be seen how the impacts of the fire will affect the ability of the Site to accommodate waste management at the same capacity as NLWA were previously operating at, however currently as a temporary solution, NLWA have been able to redirect waste to facilities elsewhere.

Paragraph 8.19 states that wider market conditions should be demonstrated through a feasibility assessment to determine whether there:

(a) is sufficient ongoing demand for the existing waste use to continue at the particular location, and
(b) robustly explores all reasonable alternative waste uses, and such assessment having particular regard to the potential for the site to accommodate other waste related or circular economy functions, across all relevant waste streams at an equivalent or higher level of waste hierarchy.

An assessment of wider market conditions can be made applying the data from the Knight Frank market survey in 2026, supported by the 2024 data from CBRE's survey as set out at paragraph 9 above.

This clearly demonstrates, in respect of (a) above that there is not a sufficient ongoing demand for waste use to continue at the Site. In relation to (b), the concerns raised by respondents to the Survey apply equally to other waste uses, and show there is no realistic prospect of future waste operations on the Site.

The general policy direction points to encouraging reduction in waste, and sustainable solutions to waste management, both locally and regionally. Draft Policy WLWP 6 (Circular Economy and Resource Efficiency) promotes waste reduction and high-value resource recovery in West London, and integration of Circular Economy principles in waste management facilities. dLP Policy GLE12 states that development plans should plan for waste reductions; and dLP Policy GLE11 (Circular Economy) support aims to move towards a circular economy, including by waste reduction and promoting reuse and recycling.

Despite a clear lack of demand for a waste use, there is noted demand for industrial uses, with British Land having had advanced discussions with a potential tenant for the Site, which would lead to intensification, as directed by policy.

<u>Alignment with other sites proposed for release</u>

Noting the assessment which has been undertaken of the Site against the release policies in the dWLWP, it is of assistance to consider the justifications for the release of the six existing waste sites from safeguarding proposed in the dWLWP, where local authorities have determined that waste capacity remains sufficient and that releasing these sites contributes to achieving wider planning and regeneration objectives.

A summary of the sites identified for release and the reasons for this are as follows:

1. **Initial Washrooms (HO12)- (HIC Waste transfer):** Released to facilitate a mixed-use scheme of 1,800 homes and industrial intensification at the West Cross Campus, alongside the new Golden Mile station.
2. **Atlas Wharf (E10) (CDEW):** Released for the Channel Gate allocation to deliver 3,100 homes and significant commercial/industrial floorspace, as well as a new park and social infrastructure. This site is part of the wider Old Oak scheme proposed to deliver over 8,000 homes and over 10,000 jobs.
3. **Quattro (E21) (Waste transfer):** No longer operational (since 2018) and released to support the Acton Wells East allocation for 1,650 homes and 8,000 commercial or industrial floorspace. This site is part of the wider Old Oak scheme proposed to deliver over 8,000 homes and over 10,000 jobs.
4. **Mitre Works (B11) (HIC Metal recycling):** Released as part of the adopted Neasden Stations Growth Area (BEGA1) and its associated Masterplan SPD.
5. **Land at Neasden Goods Yard (B03) (Waste transfer CDEW):** Released to facilitate the delivery of the Neasden Stations Growth Area.
6. **Unit 6 Neasden Goods Yard (B09) (Waste transfer CDEW):** Released under the same regeneration objectives for the Neasden Stations Growth Area.

The justification for removing the aforementioned sites relies on grounds that broadly align with the tests set out in dWLWP Policy 1 at paragraph F, including specific site allocations; potential for significant mixed-use or industrial intensification; location within a growth area; or the cessation of operations.

The release of the Site would also accord with the justifications provided for the release of the above sites. The consistent approach would be to release the Site in addition to the above sites. This would accord with both the waste policies and industrial policies identified above.

<u>Railway Sidings</u>

The dWLWP Policy 1 (at paragraph H) aims to protect railheads associated with safeguarded waste sites. It provides that:

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

Whilst the Site is not identified in the dWLWP as a site which has an associated railhead which is subject to the safeguarding policy, as the Site incorporates existing rail sidings along its northern boundary; remnants of a historical freight corridor connected to the Chiltern Main Line, we address in these representations the position in respect of them and their relevance for the consideration of the release of the Site from safeguarding for completeness.

Information in this respect of the feasibility of the re-use of the railway sidings within the Site has been supplied to LBB in connection with the OPA, and a copy of the submitted Railway Sidings

Feasibility Technical Note (produced by WSP and dated November 2025) is included at Appendix B to this representation for ease of reference.

In summary, the conclusions of the technical feasibility assessment were as follows:

- While the rail sidings at the Hannah Close site remain physically connected to the Chiltern Main Line and offer some potential space for freight use, the current absence of any services— planned or ad hoc—negatively impacts their operational value.
- The Site is now fully road-focused, and existing tenants show no evident demand for rail freight services. Noting in particular that the railway sidings have never been used in connection with a waste use.
- Although some timetable capacity exists, the lack of reserved freight paths, coupled with the complexity and cost of securing new ones, presents a significant barrier to reactivation.
- In its current condition, the Site cannot support even basic operational flexibility without significant investment.
- Attempting to reverse or turn freight here would not only pose a risk of disruption to surrounding operations but would also pose a serious safety and operational risk, meaning is currently fundamentally unsuited for modern freight manoeuvres.
- The layout of the Hannah Close Site means that it is not suitable for manoeuvering and reversing a freight service due to its smaller size and track configuration.
- The financial burden of reinstating the sidings is substantial, and the case for reusing the sidings potentially financially unviable in the absence of a clear and sustained freight demand.
- On balance, unless there is a significant change in site operations or regional logistics strategy that drives a dedicated freight requirement, the justification for retaining or investing in the sidings is weak.
- Their continued disuse and the high costs associated with reinstatement make their removal the more pragmatic option.

Accordingly, the already very low feasibility of viable use when considered for freight use is even lower when considering this in connection with a waste use.

In the circumstances, and whilst we note that the draft policy does not consider feasibility (and which we consider to be an omission that should be addressed), given that it is not feasible to re-use the railway sidings we do not identify that the presence of the existing disused railway sidings within the Site weighs in any way in favour of continuing to safeguard the Site for waste uses.

Having regard to the above assessment, which has been undertaken against the policies for release contained with dWLWP Policy 1, but that the appropriate plan making stage, it is very clear that the lack of demand for the Site for use as a waste facility or feasibility, supported by the level of surplus which would exist where the Site is removed from safeguarding direct that the Site could be released for other land uses without undermining the soundness of the plan, and that there are clear and convincing justifications for why the Site should be released from safeguarding for waste use, and would be more appropriately used for other uses to respond to need and current and emerging policy objectives.

11. Conclusions

The plan-making process is critical to achieving sustainable development within a plan-based system, and this is more so the case in respect of waste planning, where development plan policies by their nature seek to restrict the use of land by safeguarding sites for waste use, and where there is an overarching strategic planning policy at LP paragraph 9.9.2 which provides that "***Any proposed release of current waste sites or those identified for future waste management capacity should be part of a plan-led process***".

In light of this, it is imperative that the appropriateness of and justification for retaining sites as safeguarded waste sites is properly interrogated at the plan-making stage. Moreover, the scarcity of land within London suitable for industrial uses which are needed to support a thriving London economy demand that all such land which is suitable, but which is subject to restriction on its use for such purposes, is only subject to such restrictions where this is clearly justified, by evidence, and where it is no more than is reasonably needed to achieve the overarching purpose for which it is safeguarded, which is the overarching objective of London achieving net waste self-sufficiency in accordance with the relevant statutory requirements.

These submissions on behalf of British Land are principally that there is a significant surplus of land and capacity (including future intensified and optimised capacity on sustainably operating waste sites) available for waste uses and processing within the West London Waste Authority Area, and moreover across London as a whole, and this must call into question with a sharper focus the continued safeguarding of sites for waste uses which otherwise benefit from strong planning policy support, including locationally, for other industrial uses. Evidently, the WLLPAs agree with this position, and it is on this basis the dWLWP Policy 1 identifies clearly the criteria which are relevant to confirming when sites may be released from safeguarding. The failing of the dWLWP is that it has not applied those criteria as it is required to at the plan-making stage and has not recognised the extent of the surplus waste capacity.

Having regard to the Site, its particular circumstances and the wider market conditions, and the justification for releasing this from continued safeguarding, the submissions within this representation have clearly set out how the Site's circumstances align with all the relevant criteria for release, and how all of them indicate that the Site is one which is justified for release. As has been detailed above, the level of surplus which would exist where the Site is removed from safeguarding direct that the Site could be released for other land uses without undermining the soundness of the plan, and there are clear and convincing justifications for why the Site, when having regard to its very particular circumstances and the consequences of wider market conditions in that context, should be released from safeguarding for waste use.

Moreover, having regard to all of the above, and the policies in the LP which provide clear and compelling support for the industrial intensification of appropriate land (as detailed in Section 5 to these representations), it is submitted that the dWLWP is not in general conformity with the SDS for London, being the adopted LP.

These submissions therefore request that the WLA fully consider the justification for releasing the Site, and reach the conclusion that the Site, which is a prime opportunity to provide valuable intensified industrial operations in accordance with the London Plan and Brent Local Plan policies and objectives, is released from safeguarding, and no longer subject to waste use safeguarding.

It is evident the Site has not been able to achieve the establishment of a permanent sustainable waste use within the last 16 years, and it will shortly, next year in 2027, be without any waste operator and any reasonable prospect of securing a viable waste use with a long-term operator. This is notwithstanding the current condition of the Site following the fire in August 2026 and that this further reduces any prospect of waste uses from the Site in the future. There is currently no building on the Site which could process waste and this would need to be rebuilt, without any prospect of a tenant, as there is an evidenced lack of demand for the Site largely due to viability concerns and high rents, which would be exacerbated by the costs of rebuilding and fitting out the facility to the required modern standards to meet regulatory requirements.

This representation has raised very significant issues with the dWLWP, including in respect of its compliance with law and the extent to which the approach taken to producing it is policy compliant, and its evidence base (or in several critical respects, the lack thereof).

It is hoped that these submissions will be given the necessary level of due consideration and an intelligible response, and we confirm that our client, British Land, will be very happy to engage with the WLA on the issues raised in this representation.

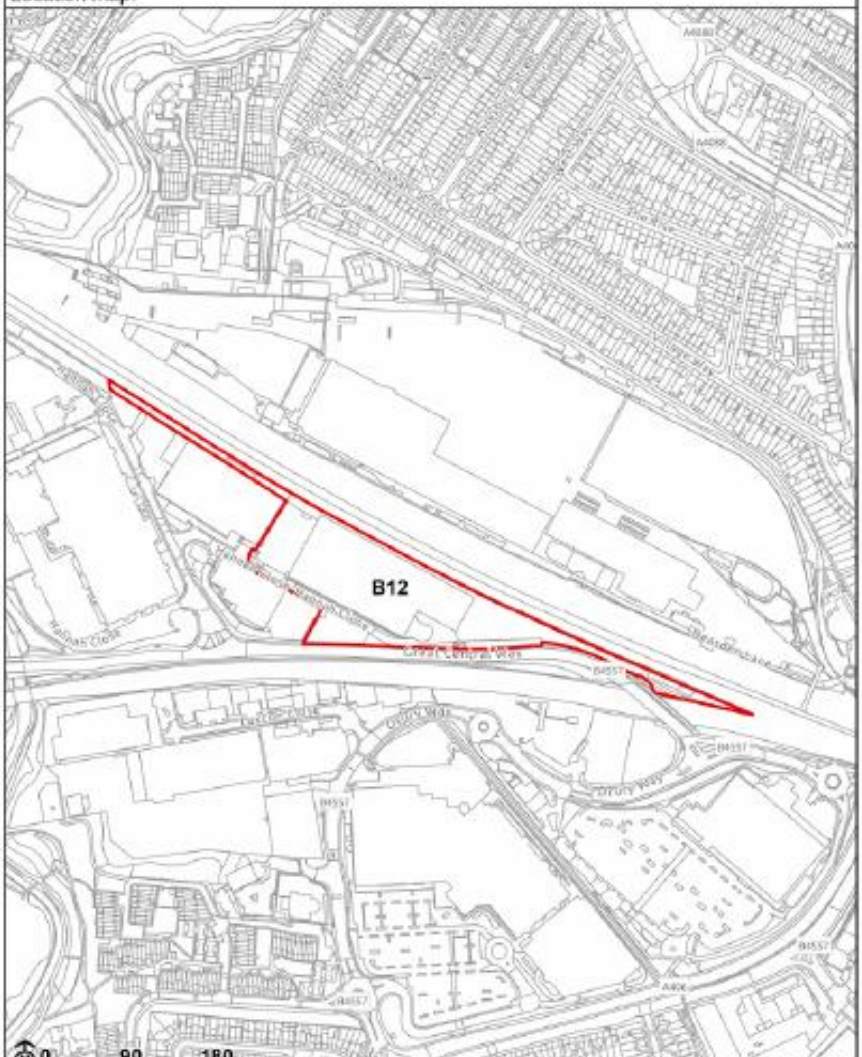
Yours faithfully

[redacted]

DP9 Ltd.

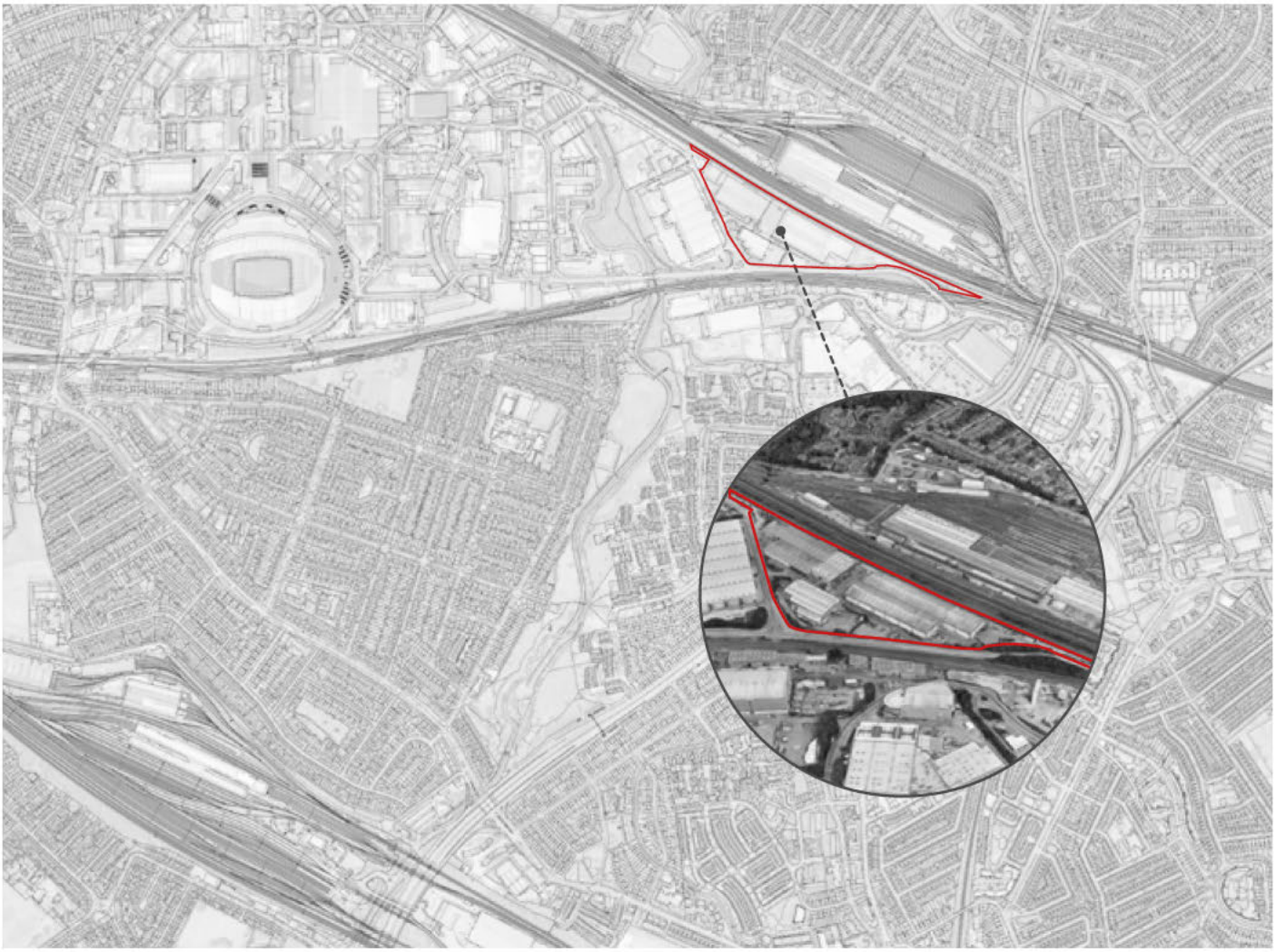
Appendix A: The Site – Unit 2, Hannah Close (Extract from the dWLWP).

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



Key:
Site boundary

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Hannah Close, Wembley - Railway Sidings - Feasibility Technical Note

18124 - November

British Land

British Land Properties Limited

Hannah Close Freight Sidings

Freight Sidings - Feasibility Technical Note

November 2025

UK361311



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Freight Sidings - Feasibility Technical Note

Version 1

Project no. UK361311

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Quality Control

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1 Introduction

1.1 Background

This Freight Sidings Feasibility Technical Note has been prepared by WSP on behalf of British Land Properties Limited (the 'Applicant') in support of an Outline Planning Application ('OPA') for the redevelopment of Units 2-4, Hannah Close, Wembley (the 'Site'). The OPA is submitted to the London Borough of Brent ('LBB').

The description of development is as follows (the 'Proposed Development'):

"Outline planning application (all matters reserved) for the demolition of all structures and phased redevelopment of the site to provide buildings comprising a mix of uses including: light industrial, general industrial, storage, distribution and logistics, waste facility and data centre, and ancillary office spaces, creation of servicing areas and provision of associated services, including waste, refuse, cycle storage, and lighting; and all associated works and operations including but not limited to: demolition; earthworks; provision of attenuation infrastructure, engineering operations."

This OPA sets out parameters for the layout, access, scale, appearance and landscaping of the Proposed Development. These are submitted for approval in three Control Documents called the Development Specification, the Parameter Plans and the Design Guidelines. The OPA sets the rules and parameters which future detailed Reserved Matters Applications ('RMA') proposals will need to comply with.

1.2 Executive Summary

This technical report assesses the feasibility of retaining or removing the Hannah Close rail siding. The existing siding currently does not serve freight services, but for the purpose of aligning with the Outline Planning Application (OPA) by British Land Properties Limited, a re-evaluation regarding of the necessity of the disused rail sidings is required to form part of and reinforce the OPA and address the requirements of LBB Policy BT3. This analysis aims to provide an assessment of the operational, and financial implications of removing the remains of the disused sidings. Key considerations include current rail traffic and demands, the siding's integration with the broader network, safety and cost. This report will inform decision-makers by outlining the benefits, risks, and long-term impacts associated with removing the sidings, ensuring that any action taken aligns with site feasibility, operational efficiency and cost-effectiveness.

1.3 Context

The site under consideration is located between Hannah Close and Great Central Way (B4557) in Wembley, within the London Borough of Brent. This area lies in a predominantly

industrial and commercial zone, characterized by three active tenants and supporting infrastructure. These tenants are summarised as follows: North London Waste Unit (11,845.3sqm GIA), Amazon (7,641.0sqm GIA) and Euro Car Parts (6,717.5sqm GIA). The site benefits from its strategic position near major arterial routes, including the North Circular Road (A406) to the east and the A40 Western Avenue to the south, providing good road connectivity to central London and the wider motorway network.

The rail siding in question is adjacent to the Chiltern Main Line, which runs parallel to the north boundary of Great Central Way. Across the main line from the site is Neasden Depot that sits on the Metropolitan Line. The site is part of a historical freight corridor, previously supporting industrial operations and goods distribution in the Wembley area. While freight activity has reduced in recent years, the siding remains physically connected to the main line. Figure 1-1 below highlights the disused freight sidings (red) within this boundary (green) bordering the northern most side of the internal perimeter.



Figure 1-1 – Site Boundry and Rail Sidings

2 Site Overview

2.1 Site Layout

The site is situated between Hannah Close and Great Central Way (B4557), in Wembley, and spans 50,694sqm within a designated Strategic Industrial Location (SIL). The area features a mix of industrial buildings and hardstanding surfaces, designed to support logistics, warehousing, and rail-linked operations.

Three principal warehouse units occupy the site, currently leased to high-profile tenants including Amazon, Euro Car Parts, and the North London Waste Authority. These buildings are configured for large-scale storage and distribution, with loading bays and yard space to accommodate HGV traffic. Ancillary office spaces and service areas are incorporated within the warehouse structures.

To the northeast corner of the site lie two parallel rail sidings that connect directly to the adjacent Chiltern Main Line. The railhead includes buffer stops at the western end and trailing connections at the eastern end, allowing trains to enter and exit the mainline network from the south. The sidings are of a small to moderate length, suitable for short freight or wagon loading/unloading operations. Though currently underutilised, the physical rail infrastructure itself is somewhat intact in certain areas and offers some potential for renovation and reactivation as shown in Figure 2-1 below.



Figure 2-1 – Existing Sidings Condition

The rail on the site appears to be hard track which makes assessing their condition difficult, and additionally the track leading into the units on site have had their track removed all together. In its place, unused freight waggons, skips, pallets, vehicles and other site related objects. The current site is equipped for the transportation of goods to be done via HGV waggons which seems appropriate given the nature of the businesses occupying the site. In turn the requirement for freight at the site seems to be directly correlated to the nature of these businesses and not impacted by the wider freight industry requirement.

2.2 Rail Characteristics

The site between Hannah Close and Great Central Way contains two parallel rail sidings situated adjacent to the Chiltern Main Line, a key route connecting London Marylebone to the Midlands. These sidings are historically associated with freight handling operations and remain physically connected to the main line via a trailing connection to the south.

The sidings are non-electrified and configured to accommodate short to medium-length freight, although current usage is none-existent. Despite this, the infrastructure remains moderately intact, offering potential for reactivation or repurposing subject to necessary upgrades. The site benefits from strategic rail connectivity, with direct access to the national rail network via the Chiltern line and proximity to key junctions enabling onward links to the West Coast Main Line and other major freight corridors.

The area is not cleared for international container freight waggons according to NR (Network Rail) freight map gauge clearance. Gauge clearance is applied to track on NR infrastructure and provides a clearance rating which dictates what types of vehicles can travel over specific areas of track. The clearance is determined by the specific characteristics of the track and can be a restricting factor when it comes to operating freight services.

The northern most rail line is connected to the mainline via the points immediately upon entry to site, the rail line in the site spans approximately 640m with a buffer stop at the western end and a freight shed at the eastern end.

The southern most rail line on site is connected to the main line, also via the first set of points within the site, and runs approximately 660m from the buffer stop at the western end to the mainline at the eastern. This line has a significant difference to the other, which is that this rail line passes through a shutter in the eastern unit, allowing for a medium to small freight service to enter the site, and then reside within the unit for internal loading/unloading. The second unit on the site, the western unit, has an overhead covering which shelters a shutter on the northern side, functioning similarly to the other and allowing loading/unloading directly into the unit.

Due to the size and gauge clearance for the site, as mentioned previously, a small or medium sized freight service would be able to service the existing handling facilities on the site. Equally, due to the handling facilities being located inside the eastern unit the larger freight services will require a huge amount of area dedicated to unload of the freight, which reduces the effectiveness of the building operation.

Figure 2-2 below shows the site area in which the shutter on the eastern unit is visible with the disused rail line passing through.

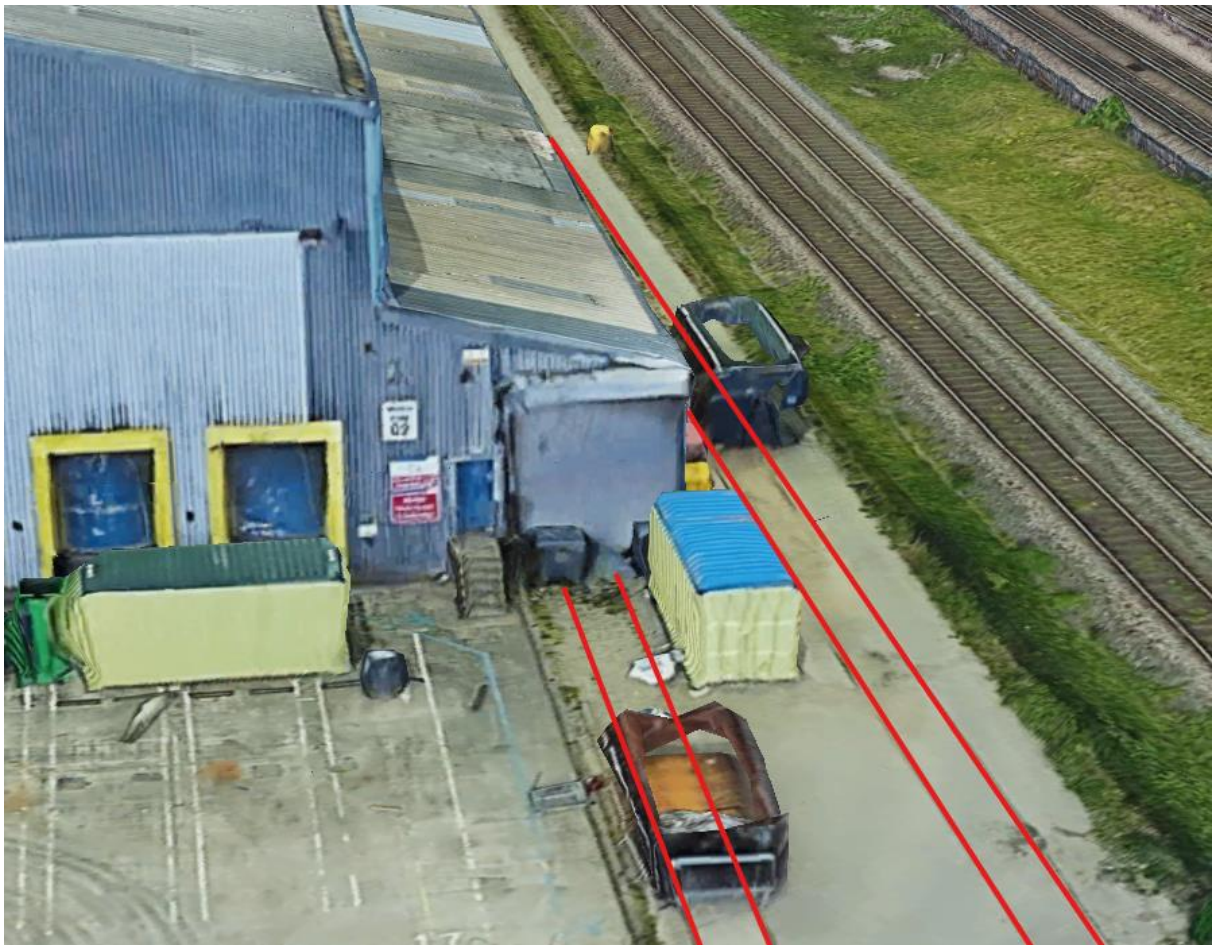


Figure 2-2 – Freight access via shutter to eastern unit on site

2.3 Asset Protection

Building Setback

In order to ensure that the buildings on the site are compliant with current TfL and Network Rail asset protection guidelines. Figure 2–3 below highlights the current rail infrastructure adjacent to the site.

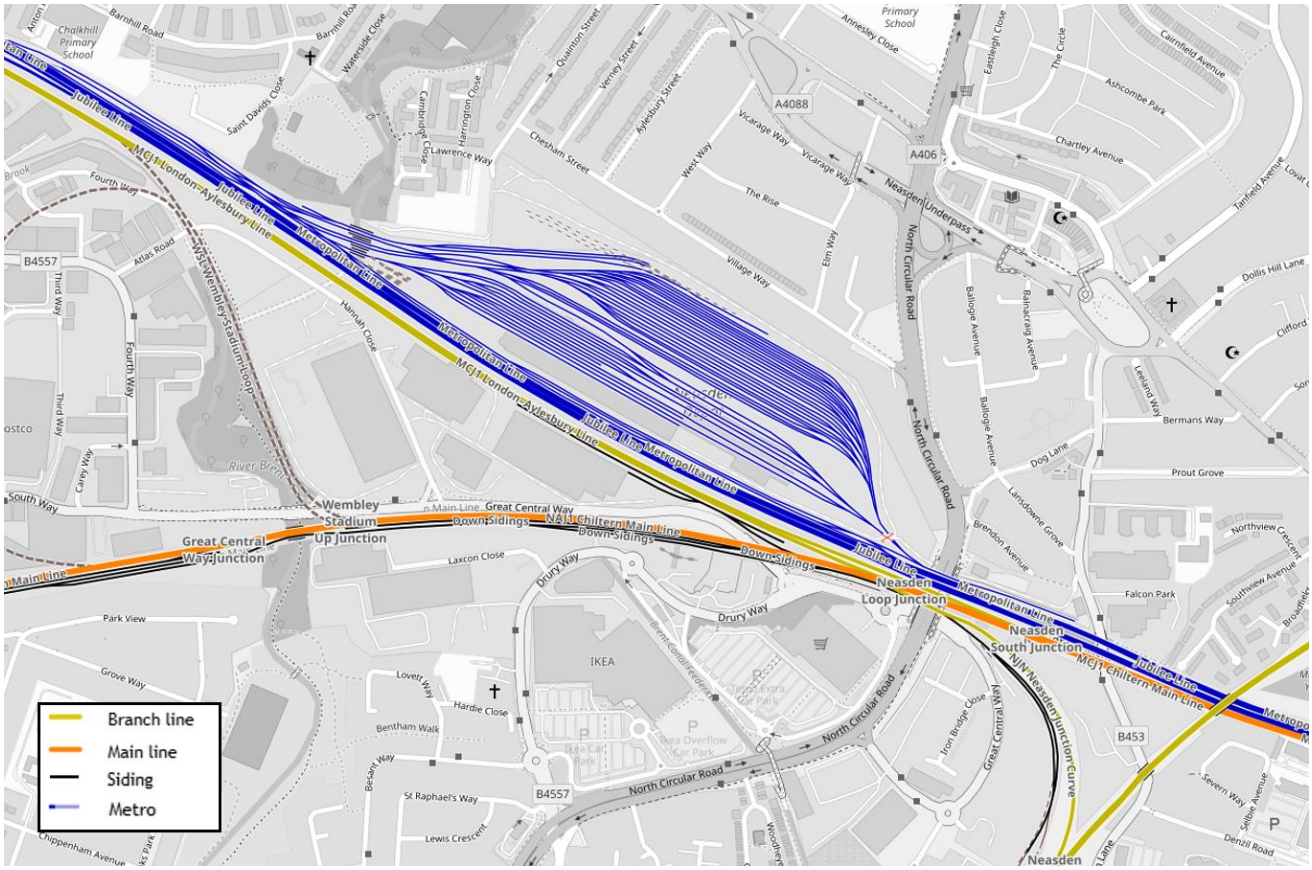


Figure 2-3 - Adjacent rail infrastructure

The above Figure shows that the adjacent rail line is not electrified and is part of the freight and Chiltern railways lines. Therefore, it seems appropriate that the current Network Rail Guidance (Asset Protection Informatives for works in close proximity to Network Rail's infrastructure) that all buildings will be set back in line with the following:

The developer must ensure that their proposal, both during construction and after completion does not:

- Encroach onto Network Rail Land
- Affect the safety, operation or integrity of the company's railway and its infrastructure
- Undermine its support zone
- Damage the company's infrastructure

- Place additional load on cuttings
- Adversely affect any railway land or structure
- Over-sail or encroach upon the air-space of any Network Rail land
- Cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future.

In addition to this the guidance states that as part of the future maintenance of the buildings that any buildings are required to be situated at least 2m (3m for overhead lines and third rail) from Network Rail's boundary. Other distances again seem to apply to works near railway lines relate to any scaffold which is to be constructed within 10 metres of the railway boundary fence must be erected in such a manner that at no time will any poles over-sail the railway and protective netting around such scaffold must be installed. The development proposals are cognisant of all of the above guidance and the building line, as shown within the parameter plans, is sited a minimum of 2m from the boundary of the site.

Whilst Network Rail appear to own the closest asset to the site, and parallel to this is TfL Underground infrastructure. Transport for London also have published guidance in 'G0023 Infrastructure Protection - Special Conditions for Outside Parties Working On or Near the Railway' – dated November 2015. This guidance states the following should be considered as part of the design process adjacent to Transport for London assets.

In preparing any design, the Outside Party shall consider the potential risks to the railway arising from the proposed works and potential risks caused to their works by the proximity of the railway. Matters that the designer should address include, but are not limited to, the following:-

a) noise and vibration impact on or from the railway;
b) emissions from tunnel and ventilation shafts or emissions from the proposed development;
c) electro-magnetic radiation impact on LU systems or the potential interference on Outside Party systems from the railway;
d) the proximity of balconies or fully opening windows to the railway and the associated risk of items falling or being thrown onto the railway;
e) access for maintenance to the railway or maintenance for the development without crossing or oversailing the other party's land or requiring inherently risky access techniques (e.g. abseiling). Note that where LU have land ownership adjacent to a structure, a 3m minimum clear maintenance strip from the structure should be allowed for;
f) no new support to be taken from LU Land or structures;
g) proximity to LU tunnels or other structures and the effect of works on these structures, including potential temporary or permanent weather proofing;

h) required site investigation, including boreholes, and the proximity of these investigations to tunnels or other structures;
i) direct or indirect (such as that caused by ground movement) changes of existing loading on or from LU structures;
j) railway security and any required revisions to fencing;
k) the impact on the railway from any change of use of land, including potential flooding run-off;
l) obstruction of signals or affect on other railway equipment, including cables;
m) landscaping and planting works, how these will be maintained and the impact of vegetation on the operation of the railway;
o) potential environmental pollution from construction or occupation of the development;
p) road vehicle incursion risks and how these may be mitigated (road alignment, barriers, vehicle height or weight restrictions, etc.);
q) restrictions on vehicular access such as height or weight restrictions.

It is not considered that the above are key issues for the proposed development. As part of the next stage of design development further consultations will be undertaken with both Network Rail and Transport for London.

Sidings

As part of the proposed development, it is anticipated that part of the railway sidings will be removed. As shown in Figure 2–4 below, it is proposed to remove the railway sidings shown in purple which sits within the applicants demise and retain the Network Rail owned assets shown on orange.

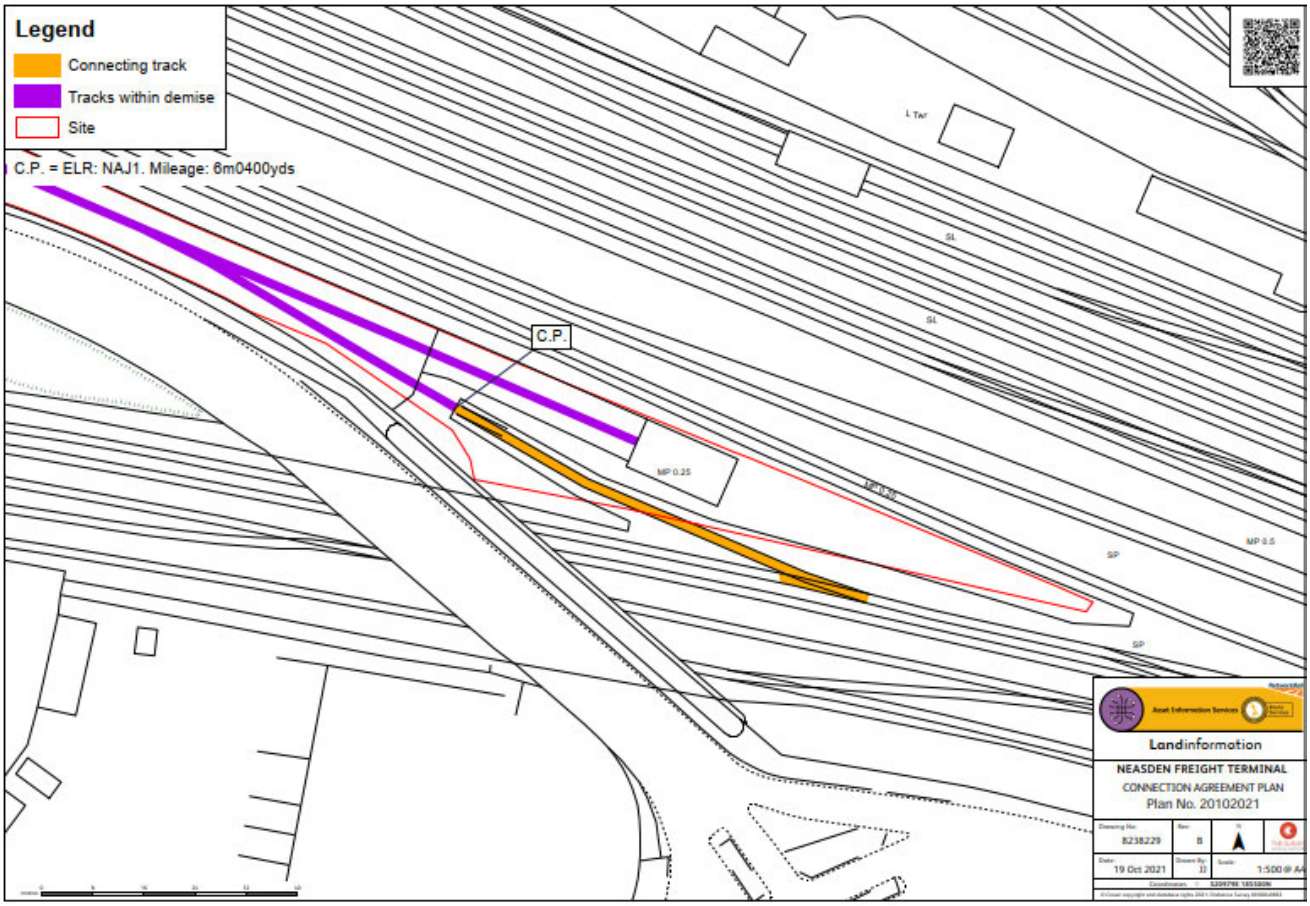


Figure 2-4 - Connection Agreement Plan

3 Operational Considerations

3.1 Routing

According to the Network Rail sectional appendix, the rail infrastructure along the main line, and the crossing points, belong to Network Rail, however past that and into the site the infrastructure falls outside of their ownership. Freight has operated in and around this area in the past due to its industrial history and could therefore theoretically be done again, notwithstanding the need for a high level of freight demand required to make it viable and other freight specific adjustments that would need to be made within the site and buildings (i.e. handling facilities and storage space for containers).

Figure 3-1 is a page taken from the Network Rail Sectional Appendix that shows the mainline outside of the site in detail, up until the point of entry where their control stops, implying the rail within the site does not fall under network rail ownership.

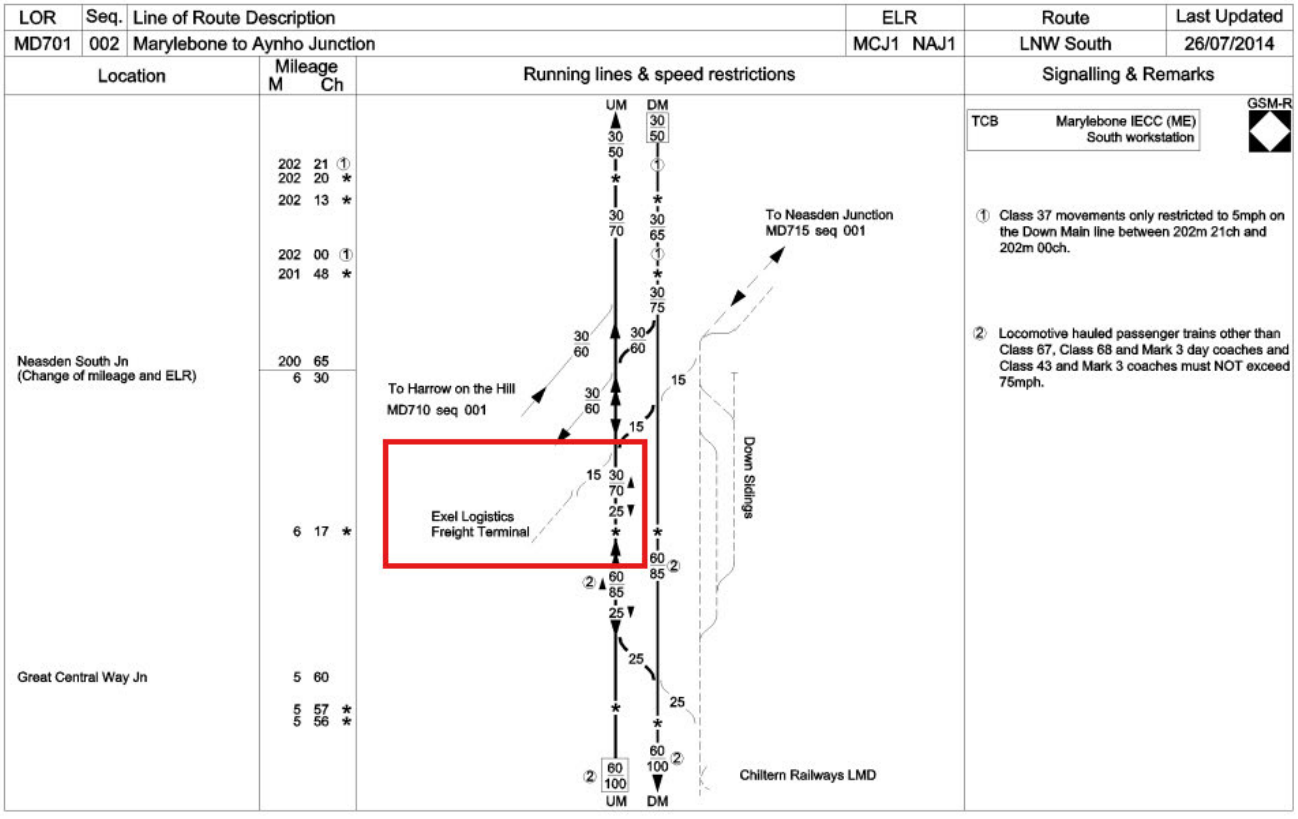


Figure 3-1 – Hannah Close Sidings in NR Sectional Appendix (Source: Network Rail Section Appendix – London North Western South)

In Figure 3-1 the freight sidings that reside within Hannah Close are labelled as Exel Logistics Freight Terminal. They can also be seen on a different page of the sectional appendix which refers to another set of sidings used as a freight turnaround for access to the West Coast Main Line.

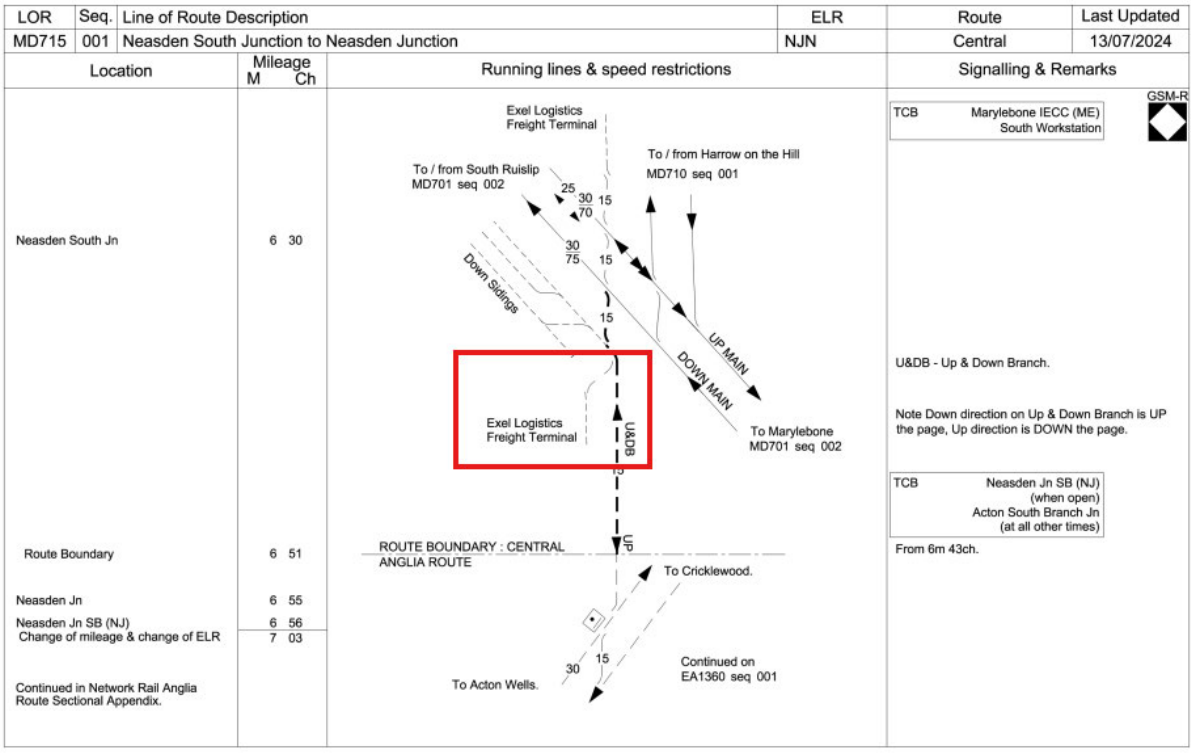


Figure 3-2 - Exel Logistics Freight Terminal Turnaround (Source: Network Rail Section Appendix – London North Western South)

Figure 3-2 from the sectional appendix highlights the other terminal located to the south of the Hannah Close Sidings.

Upon exit from the site, trains can be routed in three key directions. East, West and South.

Figure 3-3 below shows the path leaving the site to head to the WCML (West Coast Main Line). Upon leaving the site the units manoeuvre across the points to the sidings where the drivers changes ends and continue their journey via Wembley Stadium and eventually the WCML.

Manoeuvring and reversing a freight service at the Hannah Close site is impractical for any significant scale operation due to the restrictive and smaller layout and also the lack of modern rail handling infrastructure. The confined track geometry makes efficient movements difficult compared to slightly larger scale operations which could act as a restraining factor when it comes to train length and size.

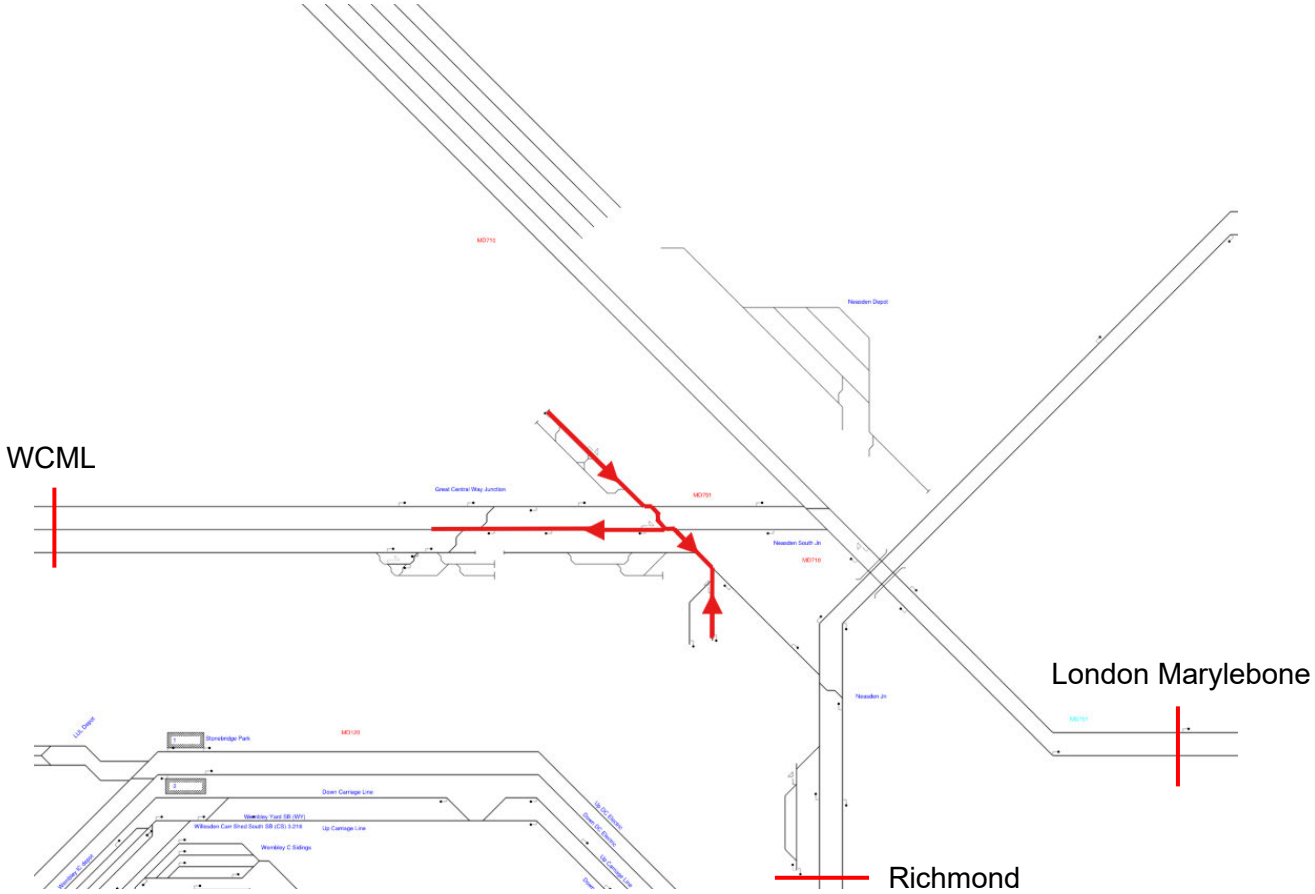


Figure 3-3 - Routing from Hannah Close to WCML via freight turnaround (Source: Raildar, Junction Maps)

Figure 3-4 below shows the path leaving the site to head to London Marylebone. The units leave the site and remain east bound along the double track section until they reach London Marylebone travelling via Hampstead Tunnel.

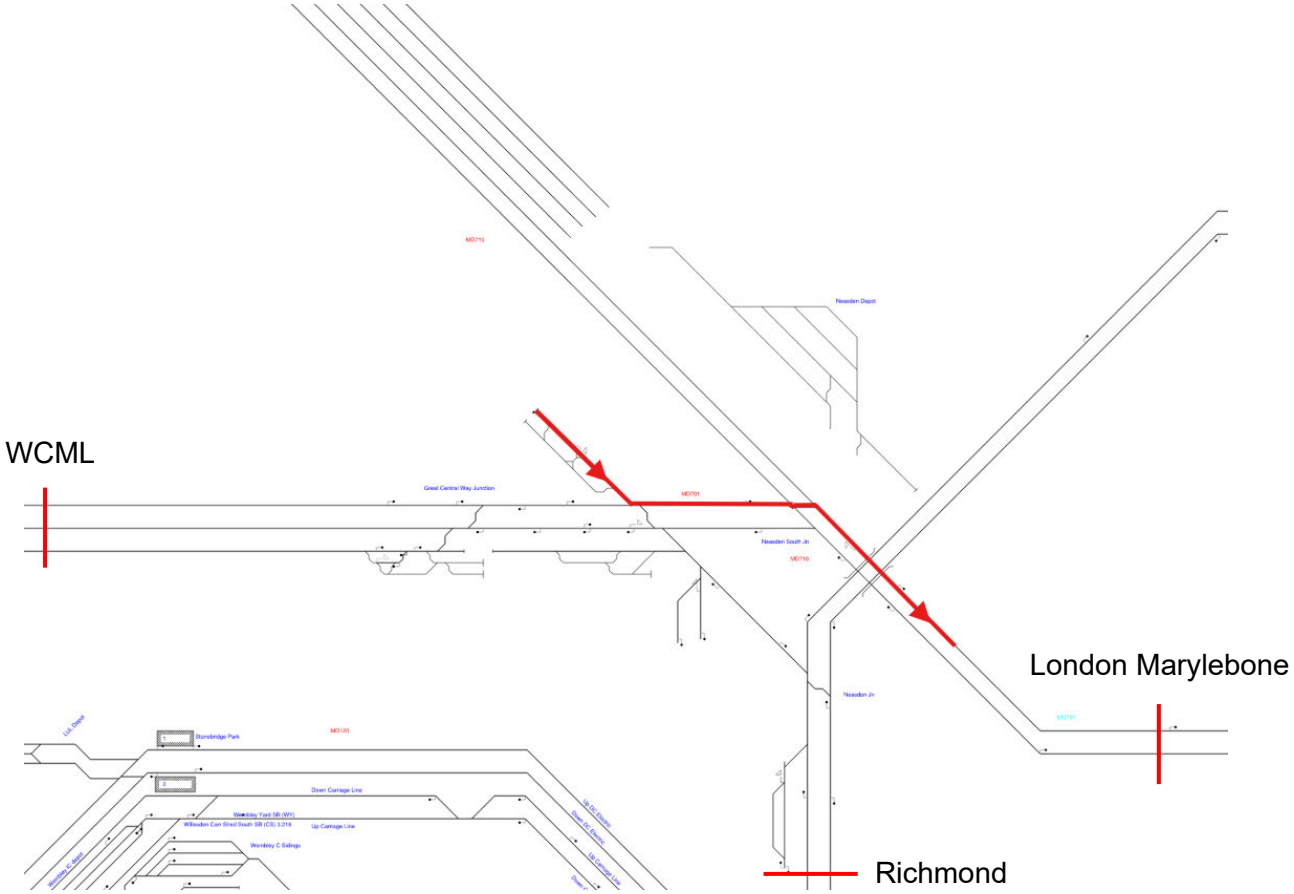


Figure 3-4 - Routing from Hannah Close to London Marylebone (Source: Raildar, Junction Maps)

Figure 3-5 below shows the path leaving the site to head to Richmond Station. The unit leaves the site and makes it way past the southern 'Exel Logistics Terminal' where is joins the wider network travelling south onto the Anglia Route towards Richmond via Acton Wells.

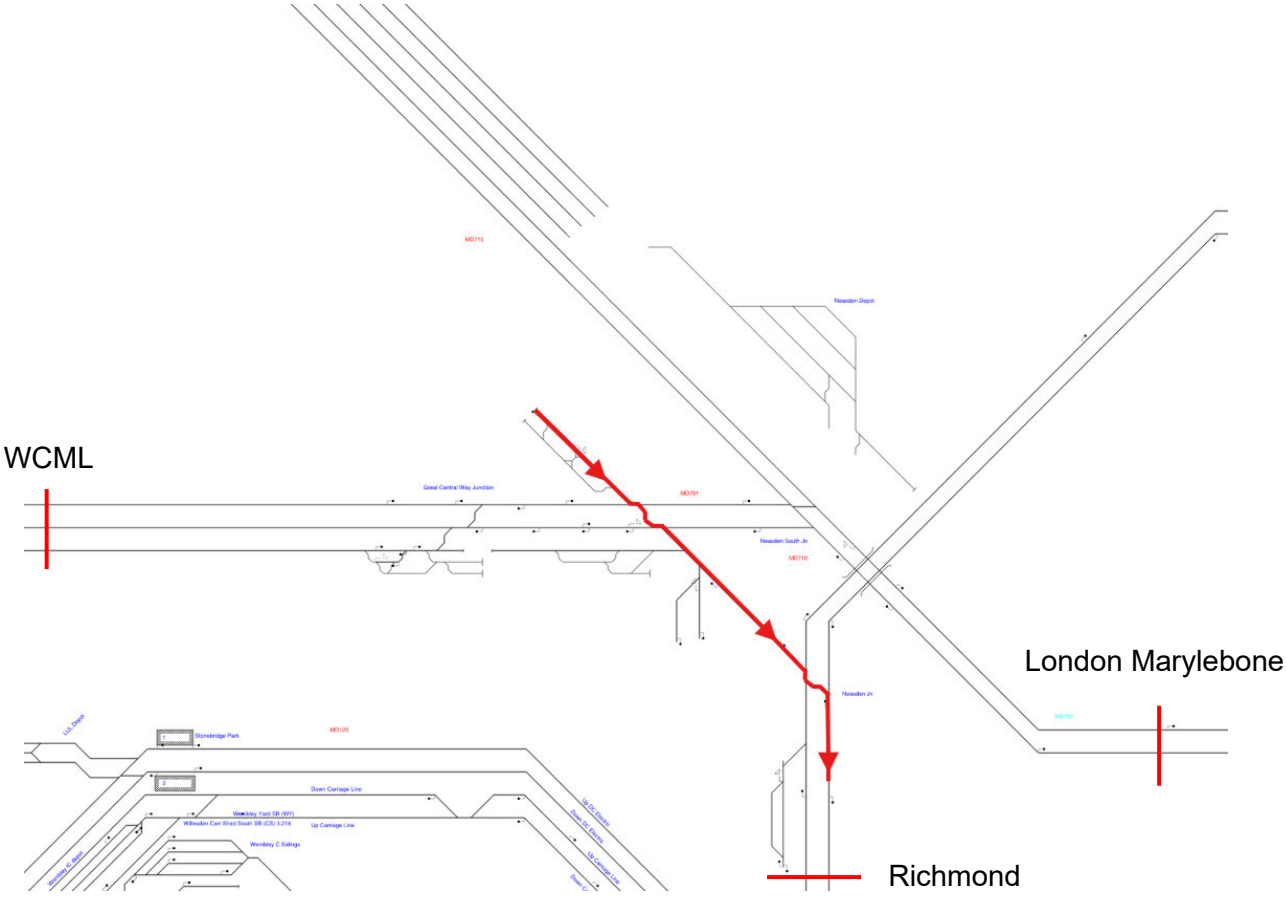


Figure 3-5 - Routing from Hannah Close to Richmond (Source: Raildar, Junction Maps)

3.2 Current Timetable

The site is next to the mainline railway running between London Marylebone, Princes Risborough, Aylesbury, Oxford and the West Midlands. Within the May 2025 timetable there are services operating frequently operated by Chiltern Railways. Within this timetable there are no planned freight services being operated at the time of this report.

Within a timetable it can be common to see freight slots planned in, known as Q paths, which are reserved in case freight services that use them infrequently need them. The timetable also shows no paths being held for such scenarios. This is not to say that freight services cannot run, but that none of them are planned into the timetable. Due to the connectivity of the line around the site it seems unlikely that any unplanned freight movements take place at present. Spot checks across operational days have been done with no freight movements, planned or unplanned, being identified.

The current timetable shows 8 passenger trains per hour leaving London Marylebone that use capacity on the main line outside of the Hannah Close site.

3.3 Rail Capacity Analysis

A high-level capacity analysis was undertaken, to give an initial indication as to how utilised the main line railway outside of Hannah Close is and understand the feasibility of introducing a freight service.

A capacity analysis is conducted by looking at a section of track and calculating how long each train occupies that section as a percentage. This time occupied is comprised of the trains journey time, headway and junction margins which are to remain in compliance with the Network Rail Train Planning Rules. It should also be noted that the amount of capacity a freight train takes up on any network is more significant than that of a passenger train due to a number of factors such as train length, lower speed restrictions and time of day (most freight services run off-peak to avoid disruption).

- *Headway* – The gap between train services dictated by the timetable planning rules.
- *Junction Margins* – The additional allowance to a train service when crossing a junction, dictated by the timetable planning rules.
- *Train Planning Rules* – Rules set out by Network Rail that outline the timing requirements to the planning of both passenger and freight services based on the relevant infrastructure.
- *Maximum TPR (trains per hour)* – The maximum number of trains eligible to run within a 1-hour window in the daily timetable, calculated by adding the headway and junction margins and dividing by 60 minutes.

For this capacity analysis the section of track that's been looked at is the section of track from London Marylebone to West Ruislip. Table 3-1 is the current capacity along this section.

Current Service Frequency (tph)	NR Train Planning Rules Headway (mins)	NR Train Planning Rules Junction Margin (mins)	Total Headway (mins)	Maximum TPR (tph)	Current Approx Utilisation (%)
8	3	1	4	15	53

Table 3-1 - High Level Capacity Analysis

Based on the capacity utilisation above, there is a good amount of opportunity to include freight trains within the timetable along the immediate surrounding rail network, were there's reason to do so. However, an important consideration being that the connectivity to the wider rail network could be a restraining factor based on their utilisation, which has not been analysed in this study. This study has only looked at and analysed the rail network immediately outside of Hannah Close and has not looked at or taken into consideration any further rail connectivity to connecting lines or infrastructure. For further freight planning and analysis, a more in-depth study of the wider rail network would need to be undertaken.

The overall impact, of introducing a freight path, to the immediate surrounding rail network is not significant and can potentially be accommodated from a timetable planning perspective if required.

4 Financial Considerations

When looking at the feasibility of using a disused freight terminal such as the one located at the Hannah Close site, there are a large number of financial considerations to look at including track access, maintenance costs, infrastructure and many other but smaller operating costs.

Through looking at the timetable, and more specifically its lack of freight paths built into it for this area on the network, the costs associated with changing this can be steep due to the lengthy processes required, as well as any adaptations to integrate seamlessly with the external existing operations.

4.1 Track Access Fees

When looking at the feasibility of utilising a disused freight terminal such as the one located at the Hannah Close site, there are a large amount of financial considerations to consider.

Freight operators pay Network Rail for the use of rail infrastructure. These charges are regulated by the Office of Rail and Road (ORR) and are periodically reviewed. Charges made can include Track Access Charges which are the fees for the use of the track (subject to the route itself and the time of day). Other charges like Capacity Reservation Charges, which are fees for reserving specific train paths in the timetable can be incurred depending on the agreement with NR.

Unplanned or ad-hoc freight movements typically incur higher charges due to the additional operational complexity they introduce. With services being unplanned they can incur short-term access charges that are applied to freight services not included in the long-term timetable. Another charge can be added for operational flexibility fees that reflect the need for flexibility and potential disruption to planned or existing services

For freight services included in the long-term timetable, charges are generally lower and more predictable. The benefits with planned timetable paths is that there are reduced access charges due to the planned usage, priority scheduling enabling better integration with passenger services and infrastructure maintenance slots.

Network Rail release, each year, their track access costs for freight operators. There are two types of track access fees, fixed and variable. Fixed costs are the costs for operating a functional rail service, for use of tracks, signals and other infrastructure. Variable costs are costs that fluctuate depending on train weight, frequency, unit type etc. These are variables that cause wear and tear to rail infrastructure at different rates which is reflected in the costs.

4.2 Additional Costs

Another additional cost, due to the state the rail within the site is in, would be the cost of relaying the track in areas it's become severely worn down or even removed. A positive would be the lack of electrification required keeping the costs to only the laying of the track and the single set of points on site. With roughly 1300m of track and a two sets of points needed, a rough cost of £975,000 (approximately £750,000 per track kilometre for main line track standard, of course the siding would not require this level of track quality).

As well as the cost of implementing the track to allow freight entry and exit to site, there would also be further costs to resuming operations in the area. These are costs such as potentially new buffer stops, fix or improve handling facilities on site after long periods of disuse and more importantly maintenance costs. These don't just allow the running of trains but ensure the safety of the people and infrastructure around the freight sidings.

5 Summary

5.1 Key Findings

Through the feasibility assessment, several significant findings were identified relevant to the future of the rail sidings at Hannah Close.

The site contains two parallel, non-electrified rail sidings, both sidings are physically connected to the mainline via trailing points at the eastern boundary and extend approximately 640m (northern siding) and 660m (southern siding).

The site layout, given its past can be accommodating to freight services. The site contains two disused, but somewhat intact rail sidings connected to the Chiltern Main Line, suitable for short freight services with refurbishment. However, current site use is road-focused, and rail freight demand appears limited, driven more by tenant operations than wider network needs. Future viability depends on aligning rail use with occupier requirements.

Network Rail owns the mainline infrastructure, and access points up to the site boundary, but the sidings within the site fall outside their ownership. The area has a history of freight use and could support future operations if demand arises.

The site's layout severely limits the feasibility of manoeuvring or reversing freight services. With no loop lines or dual access points, the existing track configuration cannot support efficient train movements. In its current state, the site is unsuitable for modern freight operations without structural upgrades.

The site has connectivity to the West Coast Main Line, Richmond and London Marylebone meaning freight connectivity and routing is limited to the west and accessing the East could prove inefficient.

As of May 2025, the main line serving the Hannah Close site is used exclusively by Chiltern Railways, with no planned or reserved (Q path) freight slots in the timetable. While this does not rule out future freight use, current operations suggest no regular or opportunistic freight movements. The line is efficiently utilised with some spare capacity, with eight passenger services per hour departing London Marylebone and occupying some available capacity near the site.

The main line immediately outside of the Hannah Close site is roughly 53% utilised meaning that if it were required a freight service could be introduced to the timetable. The turning round of freight outside of the site could take up a portion of the spare capacity but this is not a significantly restraining factor.

Utilising the disused freight terminal at Hannah Close involves several financial challenges. A key issue is the absence of freight paths in the current timetable, meaning any reintroduction of services may require costly amendments and negotiations with Network Rail.

Freight operators are subject to various regulated charges, including Track Access Charges (based on route and time of day) and Capacity Reservation Charges for securing timetable slots. Unplanned movements incur even higher costs through short-term access and operational flexibility fees, reflecting their impact on the wider network.

In contrast, long-term timetabled freight services benefit from reduced access charges, prioritised scheduling, and better integration with maintenance windows. These make planned operations more financially sustainable.

5.2 Conclusion

This feasibility into the rail sidings has been produced for contextualisation to form part of the Outline Planning Application for Hannah Close site in Wembley.

While the rail sidings at the Hannah Close site remain physically connected to the Chiltern Main Line and offer some potential space for freight use, the current absence of any services—planned or ad hoc—negatively impacts their operational value. The site is now fully road-focused, and existing tenants show no evident demand for rail freight services.

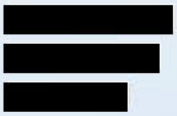
Although some timetable capacity exists, the lack of reserved freight paths, coupled with the complexity and cost of securing new ones, presents a significant barrier to reactivation. In its current condition, the site cannot support even basic operational flexibility without significant investment.

Attempting to reverse or turn freight here would not only pose a risk of disruption to surrounding operations but would also pose a serious safety and operational risk, meaning is currently fundamentally unsuited for modern freight manoeuvres.

The financial burden of reinstating the sidings is substantial. Costs would include relaying or refurbishing track infrastructure, installing or upgrading handling facilities, and covering ongoing track access charges and maintenance obligations. These make the case for reusing the sidings potentially financially unviable in the absence of a clear and sustained freight demand.

On balance, unless there is a significant change in site operations or regional logistics strategy that drives a dedicated freight requirement, the justification for retaining or investing in the sidings is weak. Their continued disuse and the high costs associated with reinstatement make their removal the more pragmatic option.





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Canal & River Trust
Making life better by water

Ealing Borough Council
Perceval House
14-16 Uxbridge Road
Ealing
London
W5 2HL

Your Ref

Our Ref CRTR-POL-2026-47309

Monday 28 September 2026

West London Waste Plan - Proposed Submission

Thank you for your consultation on the above document.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal & River Trust (the Trust) is a statutory consultee in the Development Management process and a Specific Consultation Body for Local Plan making, and, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework.

The Canal & River Trust own and manage the canal network through the DWLWP area which includes the Grand Union Canal (GUC), the Paddington Arm and Slough Arm of the GUC. The Trust also own and manage Brent (Welsh Harp) Reservoir. Based on the documents and information available the Trust has the following comments:

Policy WLWP 5 – The Trust previously commented that the policy is supportive of the deposit of inert waste for beneficial purposes - and mentions soil in this section. Topsoil, and other topsoil type materials (such as canal dredgings) are not inert but could be put to beneficial use. The policy should therefore also be clearer in support of the beneficial use of non-inert excavated material, e.g. both topsoil and sub-soil, Soil and mineral based dredgings.

The Council's comments are noted. The Trust are not in agreement that topsoil is not generally regarded as a waste. In our experience topsoil, if surplus to requirements, is often regarded as waste and would seem to fit the definition of waste set out in the Plan. DEFRA is working to address these issues, e.g through the CL:AIRE earthbanks project and it would be positive if the plan could acknowledge the need to incentivise soil reuse and discourage soil disposal.

Therefore, the concern remains that the policy only clearly supports the beneficial use of inert waste. There may be circumstances where suitable non-inert excavated material, e.g. both topsoil and sub-soil, Soil and mineral based dredgings are waste but can still be put to a genuine beneficial use.

[redacted] W: canalrivertrust.org.uk/[redacted]

Patron: King Charles III. Canal & River Trust, a charitable company limited by guarantee registered in England and Wales with company number 7807276 and registered charity number 1146792, Registered office address National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire CH65 4FW

The policy, or supporting text, should be clearer to clarify that suitable non-inert excavated material, e.g. both topsoil and sub-soil, Soil and mineral based dredgings may also be used beneficially, where appropriate. Such proposals should not automatically be treated as disposal simply because the material is not classified as inert. This clarification would provide greater flexibility for the beneficial use of suitable materials while retaining the safeguards already contained within Policy WLWP 5.

Powerday Wharf, Scrubs Lane – It is recognised that the WLWP boundary excludes the part of the OPDC area which includes Hammersmith & Fulham area. However, as per our previous comments this is a hugely important facility as the only canal wharf available in West London. In particular it was used until recently for a barge delivered waste service from Camden Market and is otherwise used by canalside developments for basement spoil and construction waste. The site sits immediately on the border of the WLWP area and serves a regional West London function. In accordance with the NPPW and the London Plan, we suggest that the WLWP should take account of waste arisings across neighbouring waste planning authority areas and sufficiently address cross-boundary waste flow movements.

Please do not hesitate to contact me with any queries you may have.

Yours faithfully,

Anne Denby MRTPI
[redacted]
[redacted]

https://canalrivertrust.org.uk/specialist-teams/planning-and-design

Patron: King Charles III. Canal & River Trust, a charitable company limited by guarantee registered in England and Wales with company number 7807276 and registered charity number 1146792, Registered office address National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire CH65 4FW

Consultation on the Proposed Submission West London Waste Plan

From 4th August to 28th September 2026

RESPONSE FORM

The London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond-upon-Thames and the Old Oak and Park Royal Development Corporation are inviting comments on the Proposed Submission West London Waste Plan (WLWP).

The Proposed Submission WLWP sets out the proposed planning strategy for waste management in the plan area up to 2041, including identifying sites proposed to be safeguarded for waste use.

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

- Policy WLWP 1 – Safeguarding Waste Sites
- Policy WLWP 2 – Provision of Additional Waste Management Capacity
- Policy WLWP 3 – Residual Waste Management and Energy Recovery
- Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities
- Policy WLWP 5 – Recovery and Disposal of Waste to Land
- Policy WLWP 6 – Circular Economy and Resource Efficiency
- Policy WLWP 7 – Wastewater Treatment Infrastructure

This consultation is the final opportunity to comment on the Proposed Submission WLWP before it is submitted to the Secretary of State for independent 'examination in public'. We would like to hear views from our local communities, businesses and other stakeholders. At this stage in the plan making process, in accordance with the national guidance, consultation responses should focus on whether the WLWP has been developed in compliance with the relevant legal and procedural requirements, including that the plan should be in general conformity with the London Plan, and the 'soundness' of the Plan. A guidance note and answers to Frequently Asked Questions provide further detail on these terms – this document is available on the online consultation portal (via the link below) alongside other supporting information.

How to respond

All the information needed to take part in the consultation can be found on Ealing Council's online consultation portal: https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation This includes the Proposed Submission WLWP, maps and all supporting evidence. Printed copies of the Plan and key supporting documents will also be available to view at the west London Boroughs' and OPDC's main offices and selected venues in the WLWP plan area. For further information on these, please visit the online consultation portal.

You can comment on the consultation documents in the following ways:

- Online questionnaire on the consultation portal https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation
- Email a response form to WLWastePlan@ealing.gov.uk a PDF and Word version of the form can be found at

https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation . In the form, in 'Word' format you can type in your response and return it as an email attachment.

- Complete and post printed copies of the response form to the address given below. Printed copies are available at the selected locations listed on the consultation portal.
- Post written responses to:

  Planning and Infrastructure
  West London Alliance
  Ealing Council
  5th Floor, Perceval House
  14-16 Uxbridge Road
  Ealing, W5 2HL

All responses must be received by 23:59 on Monday 28th September 2026.

This form has two parts:

- Part A – Personal details and About You
- Part B – Your detailed response(s).

If you wish to comment on multiple documents or sections of the plan or supporting material, then we recommend that you download and use a separate Part B form for each comment and attach these to your postal response or email.

Part A: Personal Details		
	1. Personal Details *	**2. Agent's Details (if applicable)**
Title	Ms	
First name	Rosie	
Last name	Brake	
Job title (where relevant)	[redacted]	
Organisation (where relevant)	Colne Valley Regional Park Trust	
Address	[redacted]	
Postcode	[redacted]	
Telephone	[redacted]	
E-mail address	[redacted]	

*If an agent is appointed, please provide the full contact details of the agent plus the person (title, name) or organisation they are acting for.

Part A: About You…	
3. Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	
[redacted]	
[redacted]	
[redacted]	
Other - please state what your specific interest in west London might be.	The **Colne Valley Regional Park Trust** is a registered charity which was incorporated in 2018 to take on the mantle of the lead organisation for the Colne Valley Regional Park which was established in the mid 1960's. Part of the Park lies within Hillingdon Borough.

Data protection

We will ensure that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure.

The Privacy Statement is published on the webpage https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

All responses will be held by the London Borough of Ealing. Responses will not be treated as confidential and will be published on its website and in any subsequent statements, attributed by name and/or organisation; however, personal details like address, phone number or email address will be removed.

If you submit comments, your consultation responses and personal data will be passed to the Planning Inspectorate and a Programme Officer. The Programme Officer manages the procedural and administrative aspects of the examination. The Programme Officer will contact you using the personal

information you have provided if you have indicated in the response form your wish to engage in the Examination.

Part B: Your Detailed Response			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
If you have more detailed comments to make on what the Plan should contain, please download the form, Part B– Additional Responses Continued, or print additional versions of this form, being clear about page numbers, paragraphs or infographics to which they apply, and append to your response form.			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	73
		Paragraph number(s)	8.48
		Policy no./name	WLWP 4
		Site no./ name (see Appendices to the Plan)	
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		

5. Do you consider the West London Waste Plan is:		
5.1 Legally compliant	Yes ☒	No ☐
5.2 Sound	Yes ☐	No ☒

Further information on these terms is included within the guidance note and answers to Frequently Asked Questions available on the website at https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.

We consider that policy WLWP 4, Ensuring High Quality and Resilient Waste Facilities is not sound by reason of being not **Effective**. The policy or supporting text should provide guidance to the Development Management process by referencing sources that can be used to inform specific development obligations. This will help fulfil the ambition of clause B(3) to 'deliver a lasting and positive contribution to local communities, the economy and to the protection and enhancement of the environment'.

For development within LB Hillingdon, a key reference is the Colne and Crane Valleys Green Infrastructure Strategy (2019). This sets out a range of projects to which planning obligations can contribute and make the development acceptable in planning terms.

The Trust is planning a successor document to the 2019 strategy and has also commissioned a Visioning study to contrast the effects of planned development against piecemeal attrition within the Park. The plan text should be worded to accommodate these planned studies.

We also need to point out that other plans relevant to Hillingdon (the Local Plan and the London Plan) do not refer to these studies so there is at present no risk of duplication.

Please continue on a separate sheet / expand box if necessary.

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The following footnote should be added within paragraph 8.48 after the word 'benefit':

'...opportunities to enhance biodiversity and green infrastructure on and around the site should be maximised to improve visual amenity and provide ecological benefit.'*

***Development within LB Hillingdon should refer to the Colne and Crane Valleys Green Infrastructure Strategy (and any supporting / successor documents)** Green Infrastructure Strategy - Colne and Crane Valleys - Colne Valley Regional Park

Please continue on a separate sheet / expand box if necessary.

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.*

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☒ **No**, I do not wish to participate in hearing session(s)	☐ **Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the West London Waste Plan.			
If you do not wish to be notified of future updates on the West London Waste Plan, then please tick this box, complete Part A: Personal Details of this form and return it to us. Note your name, business (if entered) and response will still be published in the consultation report.			☐
Signature:	Rosie Brake	Date:	14 September 2026
For electronic responses a typed signature is acceptable.			

Consultation on the Proposed Submission West London Waste Plan

From 4th August to 28th September 2026

RESPONSE FORM

The London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond-upon-Thames and the Old Oak and Park Royal Development Corporation are inviting comments on the Proposed Submission West London Waste Plan (WLWP).

The Proposed Submission WLWP sets out the proposed planning strategy for waste management in the plan area up to 2041, including identifying sites proposed to be safeguarded for waste use.

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

- Policy WLWP 1 – Safeguarding Waste Sites
- Policy WLWP 2 – Provision of Additional Waste Management Capacity
- Policy WLWP 3 – Residual Waste Management and Energy Recovery
- Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities
- Policy WLWP 5 – Recovery and Disposal of Waste to Land
- Policy WLWP 6 – Circular Economy and Resource Efficiency
- Policy WLWP 7 – Wastewater Treatment Infrastructure

This consultation is the final opportunity to comment on the Proposed Submission WLWP before it is submitted to the Secretary of State for independent 'examination in public'. We would like to hear views from our local communities, businesses and other stakeholders. At this stage in the plan making process, in accordance with the national guidance, consultation responses should focus on whether the WLWP has been developed in compliance with the relevant legal and procedural requirements, including that the plan should be in general conformity with the London Plan, and the 'soundness' of the Plan. A guidance note and answers to Frequently Asked Questions provide further detail on these terms – this document is available on the online consultation portal (via the link below) alongside other supporting information.

How to respond

All the information needed to take part in the consultation can be found on Ealing Council's online consultation portal: https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation This includes the Proposed Submission WLWP, maps and all supporting evidence. Printed copies of the Plan and key supporting documents will also be available to view at the west London Boroughs' and OPDC's main offices and selected venues in the WLWP plan area. For further information on these, please visit the online consultation portal.

You can comment on the consultation documents in the following ways:

- Online questionnaire on the consultation portal https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation
- Email a response form to WLWastePlan@ealing.gov.uk a PDF and Word version of the form can be found at

https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation . In the form, in 'Word' format you can type in your response and return it as an email attachment.

- Complete and post printed copies of the response form to the address given below. Printed copies are available at the selected locations listed on the consultation portal.
- Post written responses to:

  Planning and Infrastructure
  West London Alliance
  Ealing Council
  5th Floor, Perceval House
  14-16 Uxbridge Road
  Ealing, W5 2HL

All responses must be received by 23:59 on Monday 28th September 2026.

This form has two parts:

- Part A – Personal details and About You
- Part B – Your detailed response(s).

If you wish to comment on multiple documents or sections of the plan or supporting material, then we recommend that you download and use a separate Part B form for each comment and attach these to your postal response or email.

Part A: Personal Details		
	1. Personal Details *	**2. Agent's Details (if applicable)**
Title		Mr
First name		Jack
Last name		Clemance
Job title (where relevant)		[redacted]
Organisation (where relevant)	Day Group Ltd	Firstplan
Address	[redacted]	[redacted]
Postcode	[redacted]	[redacted]
Telephone		[redacted]
E-mail address		[redacted]

*If an agent is appointed, please provide the full contact details of the agent plus the person (title, name) or organisation they are acting for.

Part A: About You…	
3. Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	
[redacted]	
[redacted]	
[redacted]	
Other - please state what your specific interest in west London might be.	

Data protection

We will ensure that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure.

The Privacy Statement is published on the webpage https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

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Part B: Your Detailed Response			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
If you have more detailed comments to make on what the Plan should contain, please download the form, Part B– Additional Responses Continued, or print additional versions of this form, being clear about page numbers, paragraphs or infographics to which they apply, and append to your response form.			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☐	Page number(s)	WLWP Vision – Page 43-44 WLWP Strategic Objective 1 – Page 45 WLWP Strategic Objective 3 – Page 46
		Paragraph number(s)	Paragraph 8.17
		Policy no./name	WLWP Policy 1 WLWP Policy 2 WLWP Policy 4
		Site no./ name (see Appendices to the Plan)	Appendix 2 Site No. HO07 Appendix 3 Site No. HO07
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	

Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐	

5. Do you consider the West London Waste Plan is:		
5.1 Legally compliant	Yes ☒	No ☐
5.2 Sound	Yes ☐	No ☒

Further information on these terms is included within the guidance note and answers to Frequently Asked Questions available on the website at https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.

Please refer to full response prepared by Firstplan (Ref: 11091/VW/JC), dated 28.09.2026 – Section 5.

Please continue on a separate sheet / expand box if necessary.

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to full response prepared by Firstplan (Ref: 11091/VW/JC), dated 28.09.2026 – Section 6.

Please continue on a separate sheet / expand box if necessary.

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.*

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐ **No**, I do not wish to participate in hearing session(s)	☒ **Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Due to the key issues raised in terms of the safeguarding of Strategic Freight Sites, implications and relevant considerations this raises in the context of NPPF and London Plan requirements it is considered essential that the operator of the Day Transport Avenue site have the opportunity to fully address matters of 'soundness' they have raised at the Oral Hearings.

10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the West London Waste Plan.			
If you do not wish to be notified of future updates on the West London Waste Plan, then please tick this box, complete Part A: Personal Details of this form and return it to us. Note your name, business (if entered) and response will still be published in the consultation report.			☐
Signature:	Jack Clemance (Firstplan Ltd)	Date:	28.09.2026
For electronic responses a typed signature is acceptable.			

RESPONSE BY DAY GROUP – UNIT 8 TRANSPORT AVENUE WEST LONDON WASTE PLAN SUBMISSION VERSION CONSULTATION (REG 19)

28 SEPTEMBER 2026

FIRSTPLAN

DOCUMENT CONTROL

Project Title	WLWP Reg 19 Consultation Response – Day Group Transport Avenue
Client Name	Day Group
Site Address	Unit 8, Transport Avenue, Brentford
Report Title	Response by Day Group – Unit 8 Transport Avenue
Firstplan Ref	11091/VW/JC
Prepared by	Vilna Walsh / Jack Clemance
Version	Final for Submission
Date	28 September 2026
Copyright	The contents of this document must not be copied or reproduced in whole or in part without the written consent of Firstplan Ltd.

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FIRSTPLAN

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FIGURE 1 | DAY GROUP TRANSPORT AVENUE – SITE LOCATION PLAN

FIGURE 2 | AERIAL VIEW OF DAY GROUP SITE AND OTHER TRANSPORT AVENUE OPERATIONS

SECTION 1 | INTRODUCTION

1.1 We are instructed by our client, Day Group Ltd, to provide the following response to the Regulation 19 Proposed Submission West London Waste Plan ('Submission WLWP') Consultation (August – September 2026). Firstplan, again on behalf of Day Group, previously responded to the Regulation 18 Draft West London Waste Plan, by letter dated 05 February 2026.

1.2 Day Group hold a long leasehold interest and operate the site at Unit 8 Transport Avenue Brentford for, amongst other activities, waste management and transfer functions. The site is identified within the Submission WLWP as 'Brentford Aggregate Materials Recycling Facility' (Site Ref: HO07).

1.3 This response to the Submission WLWP identifies changes required to ensure the plan is accurate, clear and justified in its approach to safeguarding of waste sites and ultimately is able to be found sound. This in particular includes the approach taken to safeguarding of railhead sites. For the reasons set out in this Statement it is considered that the Submission WLWP, if progressed as currently envisaged fails the tests of soundness in that it has not been positively prepared, is not justified nor effective and critically that it is not consistent with national policy nor in conformity with the adopted London Plan. To assist in ensuring the Submission WLWP can be considered sound, required modifications to address the specific issues raised have been set out in full.

1.4 The application forms have been completed as applicable to cross refer to the sections of the Submission WLWP as commented on within this response.

1.5 Due to the key issues raised in terms of the safeguarding of Strategic Freight Sites, implications and relevant considerations this raises in the context of NPPF and London Plan requirements it is considered essential that the operator of the Day Transport Avenue site have the opportunity to fully address matters of 'soundness' they have raised at the Oral Hearings.

SECTION 2 | RELEVANT SITE AND OTHER INFORMATION

2.1 The Day Group site at Transport Avenue extends to some 3.8 hectares with the site boundary as detailed at Figure 1. A Google Maps aerial view of the Transport Avenue area at Figure 2 provides further detail.

Figure 1: Day Group Transport Avenue – Site Location Plan

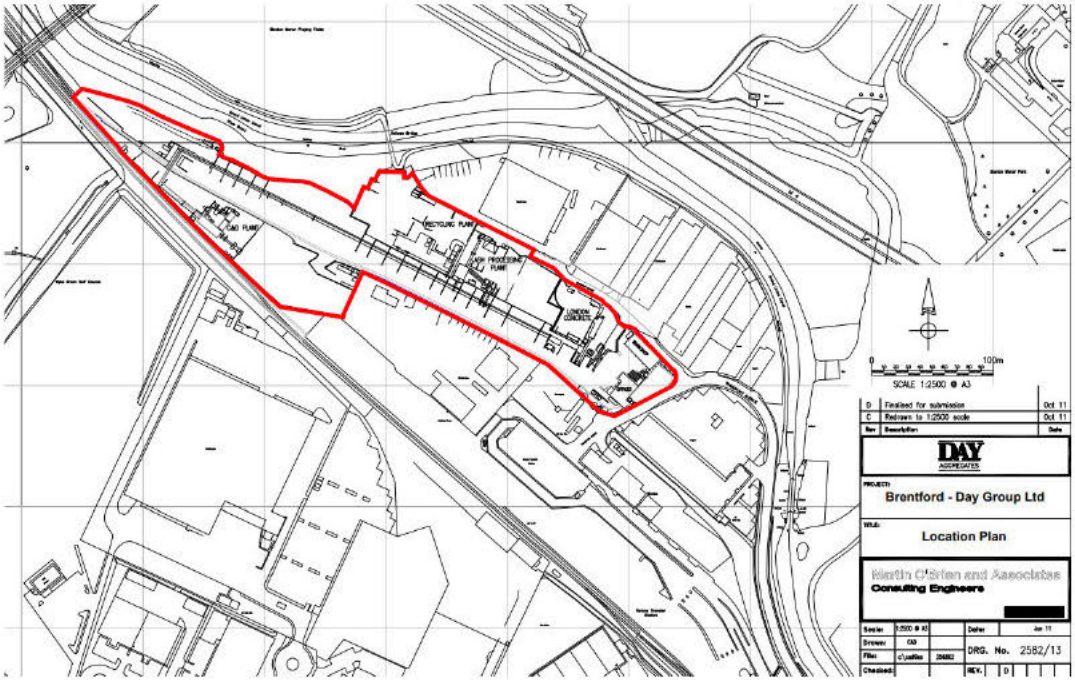
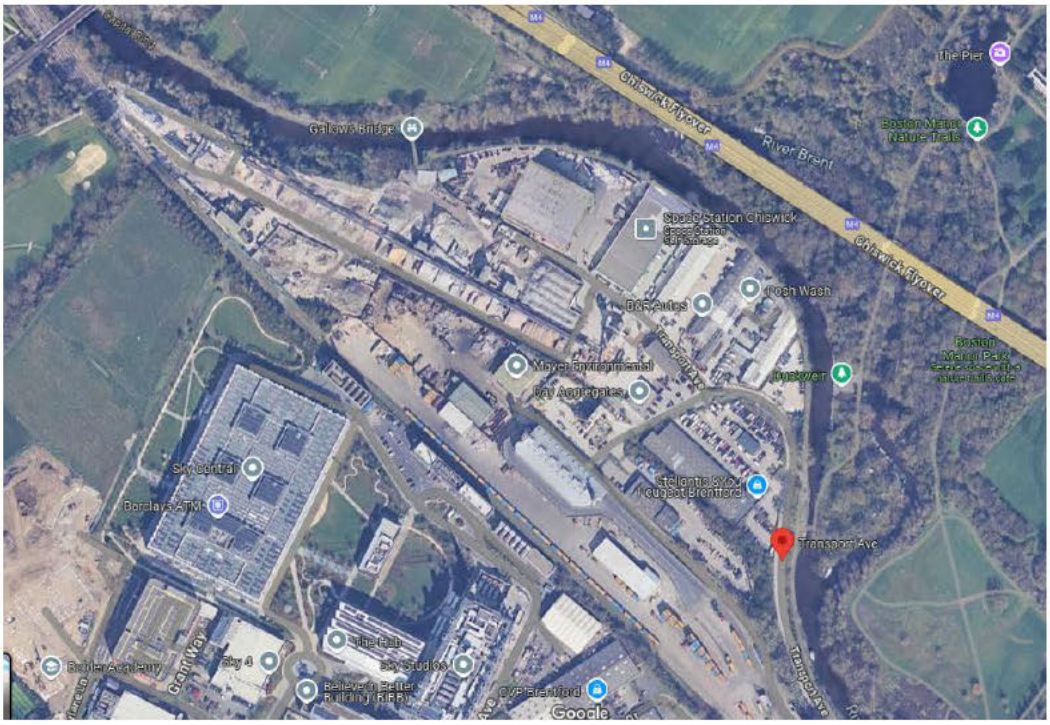


Figure 2: Aerial view of Day Group Site and other Transport Avenue Operations



2.2 The Day Group site includes: a construction and demolition waste recycling plant, an incinerator bottom ash (IBA) recycling plant, railway sidings, material storage bays, a hopper wagon unloading shed, an overhead tripper conveyor and ancillary offices. There are a number of additional industrial activities occurring at the site relating to aggregates and recycling, as well as a rail served concrete batching plant (operated by Holcim) which uses exclusively rail imported aggregates supplied by Day Group.

2.3 In a typical year Day Group recycles in the region of 450,000 tonnes of construction / demolition waste and incinerator bottom ash to provide aggregates for local construction projects.

2.4 If this capacity was not available locally, supplying the needs of the local construction market by importing additional primary aggregates in place of the recycled materials would add another 3,500,000 lorry miles (700 lorry movements per week) and 4,400 tonnes of CO2 together with the associated increase in particulates and nitrogen oxide generation in west London.

2.5 It is important to note by reference to the aggregates operations referenced, that the site is not solely a 'waste' site and the railhead also facilitates the import of aggregate. As confirmed in the Policy review of this response, for this reason the site is proposed to be safeguarded for its sustainable transport of minerals function (as required by the NPPF and London Plan) in the emerging Hounslow Local Plan which has now reached an advanced stage.

a) Future Development

2.6 Day Group has operated from this site since 1955 and continues to make substantial investments in new plant and equipment.

2.7 It is of course crucial to Day Group investment decisions that the long-term security of heavy industry in Transport Avenue is suitably protected by planning policy, particularly from the potential threat of complaints from the introduction of nearby residential occupiers.

2.8 Rail served sites such as the Day Transport Avenue site are a scarce resource, with available sites increasingly under threat by competing forms of development either on or in close proximity to these facilities. The importance of such sites in terms of supporting the construction industry in London in a sustainable form, by reducing long distance HGV miles and associated environmental benefits, is key.

SECTION 3 | IMPORTANCE OF RAIL FREIGHT AND NATIONAL POLICY DRIVERS

3.1 At London and Local Plan level, the efficient movement of freight is critical to support growth ambitions in the form of new homes and jobs and to support significant infrastructure projects. Anticipated levels of construction will create unprecedented additional demands, not only for the inward movement of construction materials but also the management, exportation and recycling of waste materials. In this context the environmental and economic benefits of rail over road are clear and compelling. The following information and evidence base documents outline this further and underpin the need for sites such as Day Transport Avenue to be appropriately and robustly safeguarded in the WLWP.

a) Network Rail – London Rail Freight Strategy (2021)

3.2 The Network Rail 'London Rail Freight Strategy – Options for the Future' Summary Report (2021) confirms that a substantial portion of the city's waste is removed by rail and highlights that:

> *"Rail freight in London faces a range of challenges, chief among which are maintaining sufficient rail-connected terminals across the city and securing capacity on the rail network for trains to reach them".*

b) The Future of Freight: A Long – Term Plan, Department for Transport (June 2022), Rail Freight Growth Target and Great British Railways

3.3 In the 'Future of Freight' published by the Department of Transport (June 2022) the Government and the privately-owned and operated freight and logistics sector state their joint ambition to build on the strong foundations established in Whitehall and across industry to develop, for the long-term, a freight and logistics sector that is cost effective, reliable, resilient, environmentally sustainable and valued by society. In the context of one of the key deliverables "environmentally sustainable" paragraph 2.6 of the document confirms that:

3.4 "In 2019 HGVs contributed 16% of domestic transport Green House Gas ("GHG") emissions….. Rail freight is on average 76% more GHG efficient per freight tonne km than road freight. By 2050, the freight and logistics sector must achieve net zero while continuing to support wider environmental ambitions including air quality and habitat preservation."

3.5 In December 2023 the government set out the ambitious target to grow rail freight by at least 75% in freight moved by 2050. This target aims to shift freight from road to rail, cut carbon emissions, and support economic growth. This reaffirms the position that rail infrastructure comprises vital infrastructure and capacity will be required to grow over the foreseeable future. This is now further underpinned by the introduction of the Railways Bill on 5 November 2025 to parliament and which completed its report stage and third reading on 10 June 2026. It is now before the House of Lords, at committee stage with Royal Assent targeted by the end of 2026. The Bill will see the creation of Great British Railways ('GBR') which will be tasked (amongst other things) with driving forwards the UK's rail freight sector, building on the government's identified target for rail freight growth.

c) Conclusions

3.6 The need for rail freight sites such as that at Day Transport Avenue are distinct and separate to those for general industrial land. Ensuring the availability and safeguarding of such sites which are affordable and in the right location is key to achieving London Plan, Mayor's Transport Strategy, and Local objectives for improving air quality and safety, reducing congestion and meeting carbon neutral objectives. This is ever more important for

freight sites such as Day Transport Avenue as they are extremely difficult to replace due to lack of available sites able to offer appropriate rail access and prohibitive costs of constructing such facilities and more often than not high cost of land and competition from higher value land uses. Hence the imperative to retain and safeguard such facilities.

SECTION 4 | PLANNING POLICY CONTEXT

a) National Planning Policy Framework (2024)

4.1 At national level, there is clear policy support and direction in the National Planning Policy Framework (NPPF, 2024) with regards to ensuring that uses and operations at the Day Transport Avenue Site are appropriately safeguarded and with regard to agent of change considerations.

4.2 Paragraph 20 regarding strategic polices confirms that:

> *"Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for:*
>
> *b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)" (Our Underline)*

4.3 In the context of 'Facilitating the sustainable use of minerals' (Section 17), the NPPF is clear at paragraph 223 (e) that planning policies should:

> *"safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material."*

4.4 It is clear by the reference even to 'potential sites' how important the role of safeguarding is in policy terms for the bulk transport (by which is meant rail or water) of minerals. Whilst the WLWP deals with waste it is clearly interlinked that such sites will both manage the delivery of new materials and export of waste.

4.5 Paragraph 85 of the NPPF, in the context of 'building a strong, competitive economy (Section 6), is clear that planning policies should:

> *"…help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development".*

4.6 The NPPF goes on, in the context of 'Building a strong, competitive economy' to state at paragraph 86 (c) that planning policies should pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying locations for uses including freight and logistics. Paragraph 87 (c) requires that planning policies should recognise and address the specific locational requirements of different sectors and including for: storage and distribution operations at a variety of suitably accessible locations that allow for the efficient and reliable handling of goods especially where this is needed to support the supply chain, transport innovation and decarbonisation.

4.7 In the context of wider considerations and the objective of achieving sustainable development at paragraph 7 of the NPPF confirms that:

> *"The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner."*

4.8 It is highly relevant that in the context of achieving sustainable development the NPPF lists 'supporting infrastructure in a sustainable manner' in the same breath as the 'provision of homes'. A key means of

supporting infrastructure in a sustainable manner must inherently include the sustainable transport of materials such as by rail.

4.9 The NPPF continues to incorporate the 'Agent of Change' principle, at Paragraph 200 is clear in its requirements that:

> *"Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."*

4.10 In terms of 'Plan Making' the following considerations are of particular relevance:

- Para 16 (a) – requires that plans should be prepared with the objective of contributing to the achievement of sustainable development.
- Para 16 (d) – confirms that plans should contain policies that are clearly written and unambiguous, so it is evident how decision makers should react to development proposals.

b) Planning Practice Guidance

4.11 The Planning Practice Guidance ('PPG') is particularly helpful in providing further clarification as to why planning authorities should safeguard existing, planned and potential storage, handling and transport sites. It confirms (at Paragraph: 006 Reference ID: 27-006-20140306) that this is to:

- Ensure that sites for these purpose are available should they be needed; and
- Prevent sensitive or inappropriate development that would conflict with the use of sites identified for these purposes.

c) National Planning Policy of Waste (2014)

4.12 National Planning Policy for Waste (NPPW) sets out detailed waste planning policies and should be read in conjunction with the NPPF. The NPPW is clear at Paragraph 5 that waste planning authorities should consider waste management facilities in terms of:

> *"the capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from resource recovery, seeking when practicable and beneficial to use modes other than road transport"*

d) National Planning Policy Framework (August 2026)

4.13 A new NPPF was published on 17 August 2026. The NPPF 2026 provides transitional arrangements for plans at different stages of preparation. This identifies at Annex A those plans which should be produced in accordance with this Framework. Any other plans should be produced in accordance with the version of this Framework as published in December 2024, unless the transitional arrangements in Annex 1 to that Framework apply. The WLWP Regulation 19 Submission Plan is being prepared under the legacy plan-making system and accordingly falls within this transitional provision. The soundness of the WLWP should therefore be assessed

against the Framework as published in December 2024. Relevant considerations from which are as set out above.

4.14 The national decision-making policies in the NPPF 2026 apply from 17 August 2026 and will be a material consideration in the determination of planning applications, alongside the development plan and other material considerations. It is considered that the matters and issues as identified in the context of safeguarding in these representations are reinforced by the immediate decision-making policies of the NPPF 2026.

e) London Plan

4.15 The key London Plan policies relevant to the consideration of the Day Transport Avenue Site are detailed as follows and are critical to how the Submission WLWP should approach this site.

4.16 The London Plan expressly requires the safeguarding of sites such as the Day Transport Avenue site. This is both in terms of in Development Plans and in decision making and in particular under Policies 'SI8 'Waste Capacity and net waste self-sufficiency' and T7 'Deliveries, Servicing and Construction'.

4.17 Policy SI8(A) confirms that existing waste management sites should be safeguarded and their waste management capacity optimised. Part E(5) also requires development proposals for waste sites to actively consider the use of rail networks to transport waste. Supporting paragraph 9.8.19 states that:

> *"Where movement of waste is required, priority should be given to facilities for movement by river or rail."*

4.18 Policy T7, Deliveries, Servicing and Construction, requires at Part A that:

> *"Development plans and development proposals should facilitate sustainable freight movement by rail, waterways and road."*

4.19 Policy T7 confirms at Part (D) that:

> *"Development plans should safeguard railheads unless it can be demonstrated that the railhead is no longer viable or capable of being made viable for rail-based freight handling."*

4.20 Part (D) of the policy then goes on to list the factors to consider in assessing viability of a railhead.

4.21 Part (J) of Policy T7 confirms that:

> *"Development proposals must consider the use of rail/water for the transportation of material and adopt construction site design standards that enable the use of safer, lower trucks with increased levels of direct vision on waste and landfill sites, tip sites, transfer stations and construction sites."*

4.22 Supporting paragraph 10.7.1 goes on to confirm that:

> *"An efficient freight network is necessary to support the function of the city. This policy seeks to facilitate sustainable freight movement by rail, waterways and road in London through consolidation, modal shift and promoting deliveries at different times of day and night in order to reduce the impact on road congestion and air quality, and conflict with other users."*

4.23 With regard to the 'Agent of Change Principle' supporting paragraph 3.13.1 of the Plan provides helpful context explaining that:

"for a long time, the responsibility for managing and mitigating the impact of noise and other nuisances on neighbouring residents and businesses has been placed on the business or activity making the noise or other nuisance, regardless of how long the business or activity has been operating in the area. In many cases, this has led to newly-arrived residents complaining about noise and other nuisances from the existing businesses or activities, sometimes forcing the business or other activities to close".

4.24 As confirmed at supporting paragraph 3.13.2, the Agent of Change Principle places the responsibility for mitigating the impact of noise and other nuisances firmly on the new development. This means that where new developments are proposed close to existing noise-generating uses, for example, applicants will need to design them in a more sensitive way to protect the new occupiers.

4.25 Supporting paragraph 3.13.6 is clear in confirming that the Agent of Change principle should be applied to all noise-generating uses and activities including:

'industrial sites, waste sites, safeguarded wharves, rail and other transport infrastructure.'

4.26 Policy D13 'Agent of Change' itself requires that:

"A The Agent of Change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise sensitive development. Boroughs should ensure that Development Plans and planning decisions reflect the Agent of Change principle and take account of existing noise and other nuisance-generating uses in a sensitive manner when new development is proposed nearby.

B Development should be designed to ensure that established noise and other nuisance generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.

C New noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses."

4.27 Policy D14, Noise, requires amongst other things that proposals should manage noise by: reflecting the 'agent of change' principle and mitigating and minimising the existing and potential adverse impacts of noise without placing unreasonable restrictions on existing noise-generating uses.

f) Mayors Transport Strategy (2018)

4.28 In the context of 'Improving the efficiency of freight networks', the Mayor's Transport Strategy identifies: rail and water as being particularly important for transport of heavy and containerised goods, with about 40% of construction materials being brought into London by rail. The strategy acknowledges, at page 80, that shifting more freight onto these cleaner modes will enable improvements to be made against Healthy Streets Indicators, help to reduce congestion and free up space on the road network for walking, cycling and buses. It goes on to confirm, at page 81, that:

- The London Plan will safeguard railheads.
- The Mayor, through TfL and working with Network Rail, the DfT, rail freight operating companies and port operators, will review London's strategic freight network. This will seek to identify opportunities to get more of London's freight closer to its final destination by rail and to make the most of London's rail freight opportunity, and to identify opportunities for capacity and capability enhancements where these will not impact existing and future passenger services, and where the benefits will be seen within London

g) Hounslow Local Plan

4.29 Hounslow Council's adopted Planning Policies Map accompanying the Hounslow Local Plan Volumes 1 and 2 (2015) designates the Day Transport Avenue Site as within the SIL, Brentford Preferred Industrial Location.

4.30 Policy ED2 'Maintaining the Borough's Industrial Land Supply' is clear that Preferred Industrial Locations (PILs) are designated for industrial uses that do not require a high quality environment. Such uses may require heavy goods access by road, rail, and/or water, need to operate outside normal hours and require sufficient distance or other barriers to noise-sensitive uses.

4.31 Policy EQ5 'Noise' is clear that the council will ensure noise-sensitive development is protected against existing and proposed sources of noise through careful design, layout and use of materials, adequate insulation of the building envelope (including both internal/external walls and ceilings), as well as protecting external amenity areas. The policy explains that the Council expect development proposals to (amongst other things):

- Carry out noise assessments where major schemes or a change of use to a more noise-sensitive use are proposed, detailing on site noise levels both internally and in any external amenity space, and the potential impact of the development on surrounding uses
- Minimise noise disturbance from adjoining uses by incorporating sound insulation or alternative forms of noise barrier
- Ensure that noise mitigation measures are implemented, to demonstrate compliance with British Standard BS8233: 2014 - Guidance on sound insulation and noise reduction for buildings, as appropriate.

4.32 The supporting text with this policy at 9.11 goes on to explain the approach for minimising noise impact is twofold; firstly: proposals for developments near existing sources of noise, should be designed such that disturbance is avoided and secondly: planning decisions should consider the context of the built environment, including established sources of noise pollution.

h) Emerging Planning Policy – Draft London Plan (July 2026)

4.33 The Mayor published the Draft London Plan on 16 July 2026. The Plan is currently subject to consultation, which closes on 15 October 2026. At this stage it carries limited weight. It is nevertheless an indication of the Mayor's emerging strategic approach and is helpful in demonstrating the direction of travel in the context of sustainable freight movement and safeguarding considerations.

4.34 Draft London Plan Policy MBUL1 'Spatial Strategy', Part B states that Local Plans should:

> *"(5) secure through safeguarding, site allocations and appropriate developer contributions the following infrastructure requirements:*
>
> *i. sustainable transport investment as detailed at MBUL5/Annex D to extend connectivity, expand capacity, improve quality and resilience."*

4.35 Draft London Plan Policy MBUL5 'Sustainable Transport to enable London's Growth', at Part B (5) states that Local Plans should:

> *"(5) following borough consultation with TfL and other relevant transport authorities, identify and safeguard future land requirements, including through site allocations for:*
>
> *ii. the delivery of the strategic infrastructure requirements listed in MBUL1 Spatial Strategy and Annex D Transport interventions"*

4.36 Draft Policy MBUL5 at part B (6) states that Local Plans should:

> *"(6) Enable safe, clean and efficient freight by":*
>
> *ii. protecting the operation, functionality and quality of existing rail and water freight facilities and identifying new rail and water freight facilities, particularly through site allocations."*

4.37 In the context of references in draft Policy MBUL1 and MBUL5 to Annex D 'Transport Interventions', it is noted that at Table D2 'Other transport interventions' this clearly identifies the following as an intervention:

> *"Rail and water freight infrastructure (such as intermodal facilities, nodal yards, railheads, wharves and piers).*

4.38 Draft Policy GLE12(C) 'Waste' also confirms that in identifying sites and capacity to protect and allocate to meet apportionments and other needs, the following should be considered:

> *"(2) SILs and LSISs, including safeguarded wharves with an existing or future potential for waste and secondary material management*
>
> *(3) proximity to strategic roads, safeguarded wharves and railheads which may help reduce transport-related impacts."*

i) Emerging Planning Policy – Hounslow Local Plan

4.39 The London Borough of Hounslow are currently in the process of undertaking a Local Plan Review and preparation of a new single local plan. On 23 June 2025, the draft Hounslow Local Plan 2020-2041 was formally submitted to the Secretary of State for independent examination, hearings have been completed and the Local Plan has reached an advanced stage..

4.40 Firstplan, on behalf of Day Group, submitted representations at all stages of the Local Plan review. Most recently, Firstplan appeared on behalf of Day Group at the Hounslow Local Plan EIP hearings resulting in the agreement of required Main Modifications to appropriately underpin the safeguarding of the site.

4.41 The Transport Avenue site is identified on the Policies Map as a 'Safeguarded Minerals Railhead and Associated Minerals Operation. Taking into account the most recent, Schedule of Suggested Modifications (June 2026) (EX70) the key relevant policy for the safeguarded facility is Policy EQ10 'Minerals'. Part D of this policy seeks to promote the sustainable movement of aggregates:

> *"…including safeguarding railheads used for distribution (the Safeguarded Minerals Railhead and associated minerals operations at Transport Avenue – see Figure DEQ10.1), and managing potential conflicts between new development and safeguarded sites in line with the Agent of Change principle."*

4.42 A new supporting paragraph 9.29 (agreed as a Main Modification between Day Group and LBH) states:

> *"In the context of the Transport Avenue site, safeguarding for the bulk transport and handling of minerals, the manufacture of concrete and the handling, processing and distribution of recycled and secondary aggregate material is required by both the NPPF and Policy SI10 Aggregates of the London Plan on the basis that this is vital to the sustainable movement of such materials. By safeguarding the Minerals Railhead facility, the Council will ensure that any development either within the site or in the surrounding area does not prejudice the existing or future operation of the safeguarded site and the operations it supports."*

4.43 Hounslow are currently in the process of addressing various actions required by the Inspectors following the end of the hearings with a response including an updated schedule of modifications issued on 21 September 2026. These will be subject to consultation in due course and will include the above Main Modification agreed between Day Group and LBH.

j) Policy Conclusions

4.44 It is evident from Planning Policy (National and Strategic) that the safeguarding of waste and rail sites such as that at the Day Transport Avenue Site is not achieved merely by retaining the land on which they are located for that use. For safeguarding to be effective it must work in a twofold manner. It must seek to identify and reserve safeguarded sites for a particular use as well as ensure that developments coming forward in the surrounding area are aware of the safeguarded sites and the operations they support and that they do not prejudice the use of such sites for their safeguarded purposes and in accordance with the Agent of Change principle.

4.45 The newly published NPPF 2026 (albeit not relevant to examination of this plan) nonetheless notably maintains the same approach to Rail infrastructure safeguarding as the NPPF 2024. The emerging London Plan has also been clearly demonstrated to maintain the same policy direction of travel in terms of relevant safeguarding considerations.

4.46 In the context of the clearly identified National (NPPF 2024) and Adopted London Plan policies it is key that the emerging Waste Plan should retain and appropriately reference the safeguarding for the Day Transport Avenue site and ensure this is appropriately reflected in policy. Consideration of what is needed in this respect is provided in Section 4 and 5 of this statement.

SECTION 5 | AREAS OF SUPPORT AND GROUNDS FOR OBJECTION AND FAILURE TO MEET TESTS OF SOUNDNESS (RESPONSE FORM – PART B Q4-6)

5.1 A review has been undertaken of how the Day Transport Avenue Site has been identified both in text / policy form and in terms of mapping in the Submission WLWP. In this context key areas of support are identified together with the key points at issue and identification in that context of why the WLWP as currently drafted fails to meet the tests of soundness.

a) Areas of Support

5.2 In the context of the specific issues/interests raised by Day Group the following areas of the Submission WLWP are expressly supported and should be retained. They are integral to ensuring the WLWP is 'sound':

- **WLWP Vision** – which confirms that land to be used for waste management over the next 15 years will focus on the efficient and flexible use of safeguarded waste sites, railheads and wharves for waste.
- **WLWP Strategic Objective 1** – seeks to safeguard existing waste sites whilst encouraging development to improve efficiency and throughput, co-location of with other waste uses and accordance with the agent of change principle.
- **WLWP Strategic Objective 3** – seeks to utilise and expand sustainable transport options for waste movement, including rail freight to reduce road miles by safeguarding railheads.
- **Policy WLWP 1 Safeguarding and Optimising the Waste Site Network** – (Support in Part / Object in Part) –is supported in overarching terms and in particular in relation to the protection and support for optimising waste sites including co-location opportunities and with regard to neighbouring development (application of agent of change principle). However the approach in respect of railheads as currently drafted at Part (H) of the policy is objected to due to lack of clarity and ambiguity as detailed further below.
- **Supporting Paragraph 8.17** – (Support in Part / Object in Part) – is supported where it provides clarification that should a rail site cease to be safeguarded for waste use, safeguarding for other uses continues to apply. However, it is objected to in similar terms to Policy WLWP1 for its lack of clarity and ambiguity as detailed further below.
- **Policy WLWP 2 Provision of Additional Waste Management Capacity** – is supported particularly in relation to part (5) where development should seek to make use of sustainable modes of transport including rail for transportation of materials.
- **Policy WLWP 4 Ensuring High Quality and Resilient Waste Facilities** – is supported where it requires proposals for development to demonstrate it will adapt and be resilient to climate change, minimise greenhouse gas emissions and control / reduce / mitigate impacts from vehicles.
- **Appendix 2: Safeguarded Waste Sites - Site Allocation HO07 'Brentford Aggregates Materials Recycling Facility'** – is supported in that it identifies the Day Transport Avenue site as a Safeguarded Waste Site. The correction of the assessed capacity figure to 555,000tpa in response to the Day Regulation 18 representations is also welcomed and supported.
- **Appendix 3: Maps of Safeguarded Waste Sites – Site Ref: HO07 'Brentford Aggregates Materials Recycling Facility'** – is supported by way of mapping of the Day Transport Avenue Site.

5.3 Should any material change be made to those parts of the Submission WLWP which have been expressly supported above we reserve the right to comment further at subsequent stages of the WLWP review process.

The matters identified above are essential to ensuring the Plan is sound particularly in the context of consistency with the NPPF and general conformity with London Plan requirements.

b) Points of Objections

5.4 The following identifies key points of objection which are considered to result in the Submission WLWP not being 'sound'. Proposed modifications to address the matters raised are provided at Section 5 of this Statement.

WLWP Policy 1 'Safeguarding Waste Sites' Part H and Supporting Paragraph 8.17

5.5 Part H of WLWP Policy 1 (largely repeated at Supporting Paragraph 8.17) specifically deals with railheads / wharves in terms of waste site safeguarding and confirms that:

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

5.6 Three points of objection are raised in respect of Part (H) (Formerly Part (I) at Reg 18 stage):

i) Objection Point 1

5.7 Firstly, the policy intent of Part (H) is not clear in terms of what is meant by safeguarding of railhead and wharf 'capacity for waste transportation'. It had been assumed this was referring to the capacity of these sites to transport waste which in terms of railheads includes capacity for train movements themselves. If this is the case then Day would question how the WLWP Authority expect to be able to apply this policy in terms of safeguarding a certain amount or percentage of train movements specifically for waste purposes.

5.8 Day Group confirm that there are a significant number of factors which will determine rail capacity including available train paths which are subject to regular timetable changes amongst passenger trains, available freight trains and wagon numbers / sizes, ability of receptor sites / locations to accept the transported waste among others. It is also relevant that rail movements are not subject to planning control and rail transfer operations often take place under rail related permitted development rights (as is the case at Transport Avenue). Further, rail sites such as that at Transport Avenue can also be safeguarded for non-waste purposes and specifically for the bulk transport of minerals by rail. It is not clear how a safeguarding for waste specifically will be balanced with these other, equally safeguarded, activities.

5.9 The issue of what was intended by the reference to 'capacity' was specifically raised as part of the Day Group Regulation 18 representations. The WLWP Authority response contained in the Consultation Statement (May 2026) stated that (noting that Part (I) at Regulation 18 stage now comprises Part (H)):

> *"Part (I) of Policy WLWP 1 is not intended to quantify rail capacity (for example in terms of train movements or throughputs), but rather to recognise the presence of rail (and water) linked infrastructure and ensure that this is retained for as long as an associated waste use remains lawful. The policy does not address safeguarding of rail freight or mineral infrastructure, which are addressed through separate policy frameworks "*

5.10 In direct response to the Day Group Regulation 18 Representation suggestion to remove the wording 'Capacity for waste transportation' from WLWP Policy 1the Consultation Statement states:

> *"Change Proposed – policy wording amended as suggested"*

5.11 However, as is clear from the Regulation 19 version this change has not been applied. It is assumed given the clear consultation response that this is an oversight/omission error. Either way, given the WLWP Authority confirmation in the Consultation Response that Part (H) is not intended to quantify rail capacity then this wording is redundant and should clearly be removed from both WLWP Policy 1 and supporting paragraph 8.17. The required modification is detailed in full at Section 6 of this Statement.

ii) Objection Point 2

5.12 The second point of objection in relation to WLWP Policy 1 (H) and supporting paragraph 8.17 pertains to the qualification made in respect of safeguarding railheads and wharves for waste use 'where such use does not conflict with other existing or planned uses'. The policy intent of this wording is again unclear and ambiguous and as such undermine the soundness of the policy. The wording is unclear in terms of what it is seeking to allow flexibility for and this lack of clarity and ambiguity is directly contrary to NPPF requirements. It is assumed what is meant here is that the rail or wharf infrastructure is safeguarded for waste use (transportation of waste) where such use does not conflict with other existing or planned uses of the rail or wharf infrastructure for the sustainable transfer of freight. So, for example at the Transport Avenue site given its dual use for transfer of minerals and waste by rail - that the safeguarding for waste transportation should not conflict with existing/planned transportation of minerals by rail (for which the site is also safeguarded) nor indeed associated mineral plant. If this is the intent then this is supported but needs to be more clearly stated. If this is not the intent then this should be clarified and Day Group reserve the right to comment further on any response or revised wording in this respect. On the basis of what it is assumed is meant by the Policy and supporting text in this respect required modifications have been detailed at Section 6 of this Statement.

iii) Objection Point 3

5.13 The third point of objection is in respect of the second sentence of Part (H) which states:

> *"In the event that the existing waste site ceases to be safeguarded for waste use, the safeguarding of the associated railhead or wharf for waste transport will also cease."*

5.14 Again, representations were made at Regulation 18 stage to this wording. It was fully acknowledged that the remit of the WLWP and the safeguarding contained within then WLWP Policy 1 Part I (now Part (H)) only extends as far as waste functions. However, whilst some clarification has been made to the wording (by the introduction of the wording 'for waste transport') the issue remains that the Policy could be read as setting out a blanket removal of safeguarding of the associated railhead or wharf when a waste site ceases to be safeguarded. Clearly, the WLWP is not in a position to do that particularly in the context of safeguarding requirements deriving from the NPPF and London Plan as previously detailed. Modifications were previously sought to clarify that any loss of railhead/wharf safeguarding relates to waste functions only and that safeguarding for other uses remains in place.

5.15 Whilst the issue has been addressed to some extent in supporting paragraph 8.17 and Policy WLWP 1 Part (H), in the context of consistency with the NPPF and general conformity with the London Plan and ensuring the objectives of safeguarding of sustainable transport sites, the WLWP is considered not to meet the tests of soundness as currently drafted. Required modifications have been detailed at Section 6 of this Statement.

c) Failure to Meet Tests of Soundness

5.16 The points of objection in relation to WLWP Policy 1 (H) and supporting paragraph 8.17 are considered to fail to meet the tests of soundness for the following reasons:

iv) The Plan is not 'Justified'

- The policy approach of safeguarding of railheads and wharves on the basis of 'capacity', particularly where no definition is provided as to how 'capacity' will be determined, as opposed to simply safeguarding the railhead or wharf for waste transportation is not considered to represent the most appropriate strategy when considered against the reasonable alternatives and the strategic policy framework for safeguarding of such sites. The WLWPA Consultation Statement appears to indicate agreement that a change was needed in this respect, which further supports the conclusion that the approach is not justified.

v) The Plan is not 'Effective'

- Whilst the policy approach to safeguarding waste sites is supported, in respect of Railheads and Wharves WLWP Policy 1(H) gives rise to a situation where the safeguarding of the transport infrastructure identified could be undermined.
- The Policy reference to 'capacity' of rail sites being safeguarded is not clear and is ambiguous in terms of how it is to be applied rendering this part of the policy ineffective.

vi) The Plan is not 'Consistent with National Policy' and not in 'Conformity with the London Plan'

- Where the Plan fails to appropriately underpin and reflect the Safeguarded status of railheads it is evidently not consistent with NPPF requirements that Plans should be prepared with the objective of contributing to the achievement of sustainable development (para 16(a)) nor with the NPPF requirements that planning policies should safeguard existing, planned and potential sites for the bulk transport of minerals (para 223 (e).
- The Plan is not consistent with NPPF requirements that Plans should contain policies that are clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals (para 16 (d)).
- Similarly the lack of a clear and unambiguous policy in respect of railheads and wharves results in the Submission WLWP not being consistent with the requirement that policies should help create the conditions in which businesses can invest, expand and adapt (para 85); that planning policies should pay particular regard to facilitating development to meet the needs of a modern economy including identifying suitable locations for amongst other things 'freight' (para 86(c)); and that planning policies should recognise and address the specific locational requirements. This includes making provision for storage and distribution operations in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation (para 87 (e)).

vii) The Plan is not 'Positively Prepared'

- Taking in the round all of the issues of soundness raised above, in particular those underpinning the fact that the Plan would not be effective, this fully supports the conclusion that the Plan is not positively prepared. This is in large part based on the need to appropriately apply rail safeguarding requirements notwithstanding that this is a Waste Plan.

5.17 It is reiterated again that Safeguarded Rail Freight Sites such as that at Day Transport Avenue are key to supporting the transfer of as much material (including waste) as possible from road to rail and there is a key policy drive which supports this. A failure to effectively safeguard such sites through the plan making process could compromise the function and integrity of such sites and risk placing more freight on the road network with

associated implications of increased HGV road miles and emissions. Such sites are a scarce resource and once lost are lost forever.

SECTION 6 | REQUIRED MODIFICATIONS (RESPONSE FORM – PART B Q7)

6.1 In light of the background information provided the following response is made to the Submission WLWP in terms of required modifications:

6.2 WLWP Policy 1 'Safeguarding Existing Waste Sites' Part (H) should be amended as follows:

> *"H. Railheads and whar~~f~~ves ~~capacity for waste transportation~~ associated with a safeguarded waste site will be safeguarded for waste transportation use where ~~it~~ this does not conflict with other existing or planned rail related or safeguarded uses. In the event that the existing waste site ceases to be safeguarded for waste use, the safeguarding of the associated railhead or wharf for waste transportation will also cease, with any other rail related safeguarding remaining in place."*

6.3 Similarly, supporting paragraph 8.17 should be amended as follows:

> *"Railhead and whar~~f~~ves ~~capacity for waste transportation~~ associated with a safeguarded waste site are also safeguarded for wase use, where such use does not conflict with other existing or planned rail related or other safeguarded uses. However, in the event that the waste site ceases to be safeguarded for waste use, the safeguarding of the associated railhead or wharf specifically for waste transportation will also cease. ~~while s~~Safeguarding ~~of capacity~~ for other uses continues to apply, for example for the bulk transport of minerals or for minerals plant as required by the NPPF, London Plan and/or Local Plan."*

SECTION 7 | CONCLUSIONS

7.1 Firstplan have been instructed by Day Group to provide this response to the Submission WLWP.

7.2 This response identifies changes required to ensure the plan is justified, effective, consistent with national policy, in conformity with the London plan, and positively prepared. This is particularly in those circumstances were waste safeguarding overlaps with the requirement to safeguard railheads and wharves.

7.3 From the Consultation Statement it would appear that some of the issues previously raised at Regulation 18 stage generated a response of 'Change Proposed'. However, that does not appear to have translated through to Regulation 19 stage and is potentially simply an omission. Either way, Day Group would be keen to engage early with the WLWA to review the required modifications ahead of the submission of the WLWP.

7.4 In the meantime, we would be grateful if you could confirm receipt of these representations and confirmation that they have been duly made. We would request that we be kept updated on the progress of the emerging Waste Plan and any future consultation. Should any further information / clarification be required, we would of course be very happy to provide that.

FIRSTPLAN

Consultation on the Proposed Submission West London Waste Plan

From 4th August to 28th September 2026

RESPONSE FORM

The London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond-upon-Thames and the Old Oak and Park Royal Development Corporation are inviting comments on the Proposed Submission West London Waste Plan (WLWP).

The Proposed Submission WLWP sets out the proposed planning strategy for waste management in the plan area up to 2041, including identifying sites proposed to be safeguarded for waste use.

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

- Policy WLWP 1 – Safeguarding Waste Sites
- Policy WLWP 2 – Provision of Additional Waste Management Capacity
- Policy WLWP 3 – Residual Waste Management and Energy Recovery
- Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities
- Policy WLWP 5 – Recovery and Disposal of Waste to Land
- Policy WLWP 6 – Circular Economy and Resource Efficiency
- Policy WLWP 7 – Wastewater Treatment Infrastructure

This consultation is the final opportunity to comment on the Proposed Submission WLWP before it is submitted to the Secretary of State for independent 'examination in public'. We would like to hear views from our local communities, businesses and other stakeholders. At this stage in the plan making process, in accordance with the national guidance, consultation responses should focus on whether the WLWP has been developed in compliance with the relevant legal and procedural requirements, including that the plan should be in general conformity with the London Plan, and the 'soundness' of the Plan. A guidance note and answers to Frequently Asked Questions provide further detail on these terms – this document is available on the online consultation portal (via the link below) alongside other supporting information.

How to respond

All the information needed to take part in the consultation can be found on Ealing Council's online consultation portal: https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation This includes the Proposed Submission WLWP, maps and all supporting evidence. Printed copies of the Plan and key supporting documents will also be available to view at the west London Boroughs' and OPDC's main offices and selected venues in the WLWP plan area. For further information on these, please visit the online consultation portal.

You can comment on the consultation documents in the following ways:

- Online questionnaire on the consultation portal https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation
- Email a response form to WLWastePlan@ealing.gov.uk a PDF and Word version of the form can be found at

https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation . In the form, in 'Word' format you can type in your response and return it as an email attachment.

- Complete and post printed copies of the response form to the address given below. Printed copies are available at the selected locations listed on the consultation portal.
- Post written responses to:

  Planning and Infrastructure
  West London Alliance
  Ealing Council
  5th Floor, Perceval House
  14-16 Uxbridge Road
  Ealing, W5 2HL

All responses must be received by 23:59 on Monday 28th September 2026.

This form has two parts:

- Part A – Personal details and About You
- Part B – Your detailed response(s).

If you wish to comment on multiple documents or sections of the plan or supporting material, then we recommend that you download and use a separate Part B form for each comment and attach these to your postal response or email.

Part A: Personal Details		
	1. Personal Details *	**2. Agent's Details (if applicable)**
Title	[redacted]	Mr
First name	[redacted]	Christian
Last name	[redacted]	Smith
Job title (where relevant)	[redacted]	[redacted]
Organisation (where relevant)	Envar Composting Ltd	GP Planning Ltd
Address	[redacted]	[redacted]
Postcode	[redacted]	[redacted]
Telephone		[redacted]
E-mail address	[redacted]	[redacted]

*If an agent is appointed, please provide the full contact details of the agent plus the person (title, name) or organisation they are acting for.

Part A: About You…	
3. Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]
Other - please state what your specific interest in west London might be.	Envar Composting Ltd operates an existing waste management facility.

Data protection

We will ensure that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure.

The Privacy Statement is published on the webpage https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

All responses will be held by the London Borough of Ealing. Responses will not be treated as confidential and will be published on its website and in any subsequent statements, attributed by name and/or organisation; however, personal details like address, phone number or email address will be removed.

If you submit comments, your consultation responses and personal data will be passed to the Planning Inspectorate and a Programme Officer. The Programme Officer manages the procedural and administrative aspects of the examination. The Programme Officer will contact you using the personal information you have provided if you have indicated in the response form your wish to engage in the Examination.

Part B: Your Detailed Response			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
If you have more detailed comments to make on what the Plan should contain, please download the form, Part B– Additional Responses Continued, or print additional versions of this form, being clear about page numbers, paragraphs or infographics to which they apply, and append to your response form.			
Documents		**Sections**	
Proposed Submission West London Waste Plan	✓	Page number(s)	See covering letter
		Paragraph number(s)	See covering letter
		Policy no./name	WLLP 1 Safeguarding and Optimising the Waste Site Network
		Site no./ name (see Appendices to the Plan)	Page 171 (HI 18)
		Maps	HI 18
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	✓	Page number(s)	86-87
		Paragraph number(s)	4.13
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	

Other (for example an alternative approach, or in relation to another supporting /evidence base document)	✓	See covering letter.

5. Do you consider the West London Waste Plan is:

5.1 Legally compliant	Yes ☐	No ✓
5.2 Sound	Yes ☐	No ✓

Further information on these terms is included within the guidance note and answers to Frequently Asked Questions available on the website at https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.

See covering letter.

Please continue on a separate sheet / expand box if necessary.

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or

sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
See covering letter. The Proposed Submission WLP is not sound as it has not correctly safeguarded the land granted under planning permission reference 39755/APP/2023/652 north of New Years Green Lane. Map HI 18 should be amended. The consideration of the promoted land has been ineffective through its failure to understand correctly the circumstances of the operation of green waste composting operations and future growth expectations and is therefore unsound. The Proposed Submission WLP has been ineffective in understanding the redundant IVC facility and has not taken into account the need to release this land from waste safeguarding despite a previous to the Regulation 18 Consultation. An explanation of this can be found in the covering letter to this submission. The Proposed Submission WLP does not therefore meet the tests of soundness set out at Policy PM15 (Examining local plans and minerals and waste plans of the NPPF.
Please continue on a separate sheet / expand box if necessary.
Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.*
8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐ **No**, I do not wish to participate in hearing session(s)	✓ **Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.
9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*
Envar may wish to participate in the hearing sessions to explain to the Inspector their reasons for objecting to the Proposed Submission WLP as previous written responses to the Waste Planning Authority have been unsuccessful (e.g. the Regulation 18 WLP response and its consideration).
10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the West London Waste Plan.

If you do not wish to be notified of future updates on the West London Waste Plan, then please tick this box, complete Part A: Personal Details of this form and return it to us. Note your name, business (if entered) and response will still be published in the consultation report.	☐

Signature:	Christian Smith (GP Planning Ltd)	Date:	28th September 2026
For electronic responses a typed signature is acceptable.			

GP PLANNING LTD

Ref: : Reg19 – West London WLP Proposed Submission

28th September 2026

Planning and Infrastructure
West London Alliance
Ealing Council
5th Floor, Perceval House
14-16 Uxbridge Road
Ealing, W5 2HL

BY ELECTRONIC SUBMISSION

Dear Sir/Madam,

Consultation Response on behalf of Envar Composting Ltd in relation to the West London Waste Local Plan Proposed Submission (Regulation 19 Consultation) – High View Farm, Newyears Green Lane, Harefield, Newyears Green, Uxbridge, UB9 6LX

I write on behalf of Envar Composting Ltd, in response to the West London Waste Local Plan (WLP) Proposed Submission consultation between 4th August 2026 and 28th September 2026. A response to the Regulation 18 Draft WLP was submitted in January 2026. This response relates to the WPA's consideration of that submission and the Proposed Submission MWLP.

Envar Composting Ltd operates a strategic waste management facility in the London Borough of Hillingdon at High View Farm, Newyears Green Lane, Harefield, Newyears Green, Uxbridge UB9 6LX. The existing waste management operations include an open windrow green waste composting operation, a waste transfer station and a now redundant In-Vessel Composting (IVC) facility. The permitted waste management facility includes land both north and south of New Years Green Lane.

In summary, the consultation response aims to:

1. Highlight that the Regulation 18 Draft WLP did not identify all of the land which has planning permission for open windrow green waste composting north of New Years Green Lane. The Proposed Submission West London Waste WLP has also not taken into account the representations made to the consultation exercise and therefore **my client objects to its lack of inclusion**. It is important that the permitted extension to this site is properly safeguarded in the WLP for waste management uses;

2. The now redundant IVC facility (land south of New Years Green Lane) has not been included in the 'Release of Existing Waste Sites' therefore, **my client objects to its lack of inclusion**.
3. The proposed relocation of the existing Waste Transfer Station (WTS) building to the north of New Years Green Lane.
4. Promotion of potential additional areas of land for additional waste management capacity under the 'Call for sites'.

SAFEGUARDING – ENVAR COMPOSTING LTD

Appendix 3 of the Proposed Submission WLP sets out the "Maps of Safeguarded Waste Sites". The Envar site is identified on page 171 (HI 18). The extract of that map is enclosed in Appendix 1 to this covering letter.

Planning permission was granted by Hillingdon Borough Council (as Waste Planning Authority) under planning permission reference 39755/APP/2023/652 (dated 21st June 2024) for:

> *"Regularisation of the existing green waste composting operations and proposed extension to the green waste open windrow compost maturation yard, construction of a storage container, site offices, welfare building, weighbridge/weighbridge offices, 2 no. leachate holding tanks, 2 no. 180kW generator sets, landscaping and areas of ecological enhancement, including a change of use of the land from pasture to a waste management use."*

A link to that planning permission (and associated documents) can be found here:

https://planning.hillingdon.gov.uk/OcellaWeb/planningDetails?reference=39755/APP/2023/652&from=planningSearch

As identified in the response to the Regulation 18 WLP draft, as shown on the Site Location Plan GPP-E-WLC-EX-22-01 v04 enclosed at Appendix 2 to this letter. On that drawing, the existing safeguarded land is shown shaded light orange. The other land that benefits from planning permission under the June 2024 permission is shown edged in red, with other land within the ownership of Envar Composting Ltd shown edged in blue. That land should be safeguarded as it is a lawfully implemented planning permission.

The extract from the Regulation 18 Consultation Statement Version (Final v2.2 28.05.26) confirms that the boundary has been amended (see extract below from page 45), but the safeguarding plan has not been amended.

	NGET infrastructure.		
HI18 High View Farm	Site HI18 - map of safeguarded site should reflect full extent of planning permission ref 39755/APP/2023/652 (Map provided) granted in 2024.	On behalf of Envar/West London Composting (site occupier)	**Change Proposed** - boundary amended
		Suez Recycling & Recovery	

Envar would therefore be grateful if the most recent grant of planning permission is also identified as being safeguarded under map HI 18 as part of the Proposed Submission WLP review (land to the south of New Green Lane is dealt with toward the end of this covering letter).

CHANGE OF USE OF IN-VESSEL COMPOSTING (LAND SOUTH OF NEW YEARS GREEN LANE)

The Regulation 18 Consultation Statement Version (Final v2.2 28.05.26) has considered Envar's proposed release of safeguarded land as a result of the IVC facility south of New Years Green Lane becoming redundant. The extract of that document is set out below, together with a response with points of clarification.

Interrelationship with Other Proposals

"The submission is also seeking to pave the way for a planning application to change the currently consented in vessel composting use to light industrial use. This would trigger the safeguarded waste site clause of Policy WLWP2 of the adopted WLWP which reads: Development for non-waste uses will only be considered on land in existing waste management use, or land allocated in Table 5-2 if compensatory and equal provision of capacity for waste, in scale and quality, is made elsewhere within the West London Boroughs. (footnote 30 reads: As stated in paragraph 5.14 the Quattro site is subject to HS2 safeguarding direction and therefore may be expected to be developed as an exception to this policy until 2024.) The submission makes no claim that any of the proposed changes will increase capacity, and it seems somewhat perverse that on one hand the operator is seeking to expand the footprint of the site through an allocation while on the other is seeking to reduce the footprint of the site available to the current waste use by converting the IVC area to a non-waste use. A simple question/response would be if you need additional land, why not use the currently consented area to support your open windrow composting operation?"*

Points of Clarification and Response

Executive Summary

The Applicant's existing IVC development south of New Years Green Lane was a specially designed facility to recycle commingled green and food waste. It contains x2 large reception hall buildings, a number of IVC tunnel structures and 6x water tanks involved in the former green and food waste processing and recycling operations.

The "open" windrow green waste composting operations cannot be undertaken on the land to the south of New Years Green Lane for the following main reasons:

1. The green waste recycling operation requires the shredding/screening of green waste, which is then placed in long windrows utilising a natural biological process to turn the green waste materials into nutrient-rich soil improvers (a compost product). This requires an open pad development with plenty of room. There is not enough room on the land south of New Years Green Lane to support or facilitate an existing open green waste recycling operation on the land to the north of New Years Green Lane;

2. It is also important that operations north and south of New Years Green Lane are kept separate, avoiding the need for vehicles, plant, and equipment to cross the public highway. This would create an unacceptable highway safety risk in the public interest. It is therefore not perverse to seek to expand the land to the north while releasing land to the south for redevelopment due to its redundancy.

3. The impact of the Government's policy to move to separate food waste collection means that IVC facilities (which have traditionally offered an Animal By-Product compliant, highest recycling option at best value) will no longer be able to be competitive with Anaerobic Digestion Plants. As a result, Envar Composting Ltd's IVC facility has become redundant and the IVC structures will need to be removed. The Applicant has plans to move the Waste Transfer Station to the north of New Years Green Lane so that all waste operations can benefit from being co-located avoiding the need to cross the road.

4. Given that the IVC facility is redundant, the Applicant seeks to remove its safeguarded status through the WLP making process. That will lead to the Applicant seeking planning permission for a change of use into light industrial/commercial uses in due course.

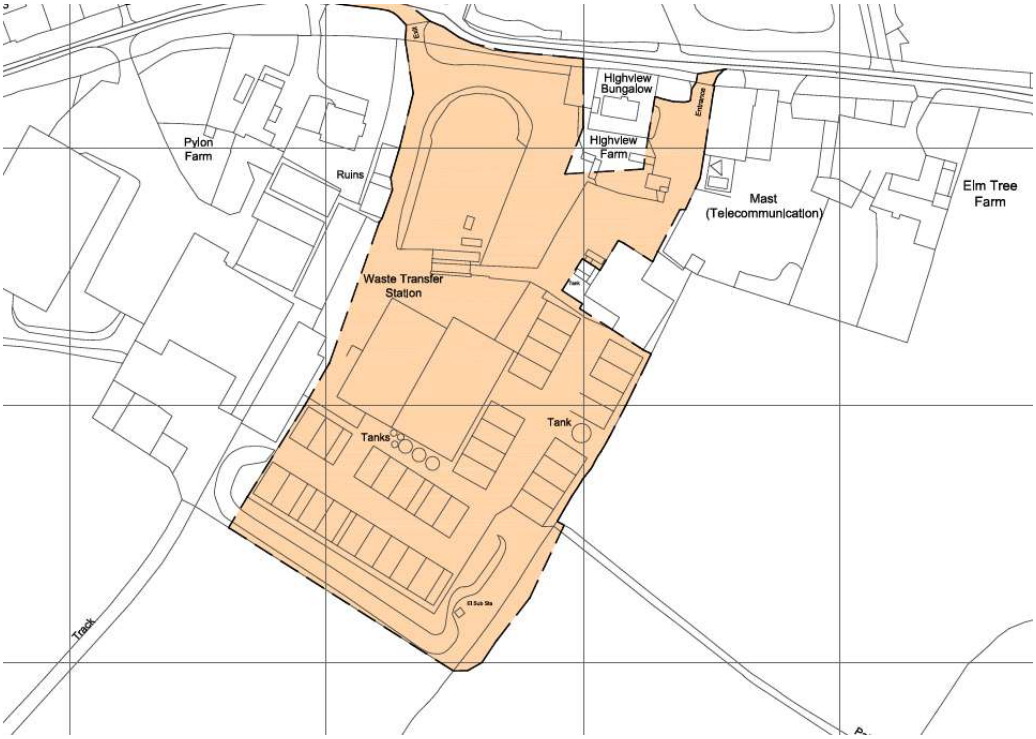
5. The promotion of additional land to the north of New Years Green Lane is therefore required to enable Envar to consolidate and co-locate all waste management operations to the north of New Years Green Lane and avoid the need for vehicles to regularly cross the public highway.

For the reasons set out below, Envar Composting Ltd proposes to seek a change of use of the IVC facility (the land south of New Years Green Lane) to commercial/light industrial related land uses, as the local authority collection services have ceased collecting co-mingled green and food waste, which has resulted in the existing IVC facility and the associated buildings and structures, which are specifically designed for processing these waste streams, becoming obsolete.

The land in light pink/orange below shows the land south of New Years Green Lane that was granted planning permission on 31st August 2022 under planning reference 12579/APP/2021/2010 for the following:

> *"The permanent residency of the land to the North and South of Newyears Green Lane for the continued use of an organic composting facility operation to handle a maximum throughput of up to 75,000 tonnes per annum of organic waste, including retrospective retention of two above ground leachate storage tanks and the installation of three freshwater storage tanks."*

A link to that planning permission can be found below:
https://planning.hillingdon.gov.uk/OcellaWeb/planningDetails?reference=12579/APP/2021/2010&from=planningSearch



The IVC facility contains x2 large reception hall buildings, a number of IVC tunnel structures and 6x water tanks involved in the former green and food waste processing and recycling operations. The existing elevation drawing, which shows the main IVC buildings/structures on site, is enclosed in Appendix 3 to this submission.

Section 57 of the Environment Act 2021 came into force on 31st March 2025. The new legislation aims to reduce environmental impact whilst promoting a circular economy. The Environment Act mandates separate food waste collections in England: weekly collections for all households by March 31, 2026, and separate collection for most businesses by March 31, 2025, aiming to cut landfill waste and boost recycling. These changes, part of Simpler Recycling reforms, mean local councils must provide the service, and businesses must arrange their own collections, with micro-businesses getting until 2027.

The move toward separate green and food kerbside collections means that most of the collected food waste will go to Anaerobic Digestion (AD) plants that can generate green gas from the waste as well as liquid digestate for fertilising agricultural land. Anaerobic Digestion operators benefit from financial incentives, such as the Feed in Tarif (FIT's)/ Renewable Heat Incentive and Green Gas Support Scheme. AD plants commonly offer more competitive gate fees as opposed to IVC facilities.

The impact of the Government's policy to move to separate food waste collection means that IVC facilities (which has traditionally offered an Animal By-Product compliant, highest recycling option at best value) will now longer be able to be competitive with Anaerobic Digestion Plants. As a result, Envar Composting Ltd's IVC facility has become redundant.

There is therefore no reasonable likelihood of the IVC facility receiving any further food waste or co-mingled green and food waste going forward for the main reasons detailed below:

- All of West London Waste Authority 's food waste goes to bio-collectors South London Anaerobic Digestion Plant sites

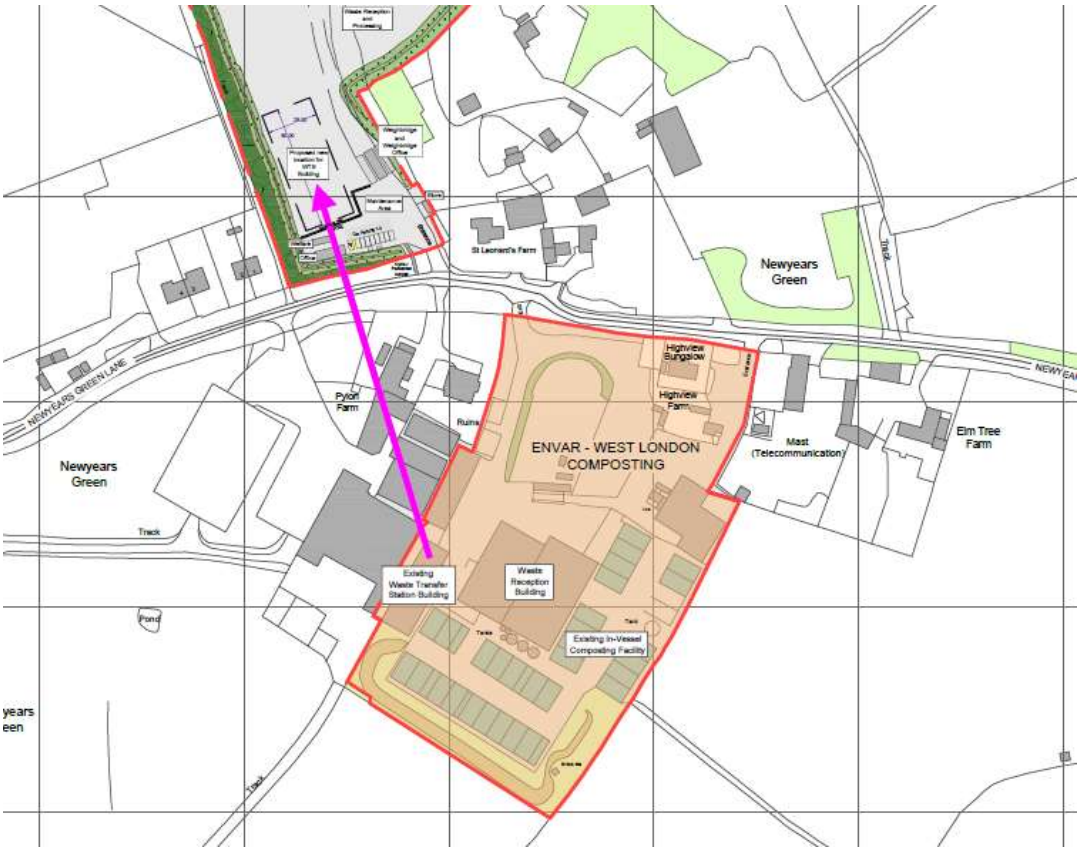
- Hillingdon were the last Authority to collect co-mingled food and free waste within the WLWA area and this ceased in July 2021
- Surrey, Kent and Buckinghamshire already separately collect food and green waste
- Berkshire sends its co-mingled waste to Veolia (Padworth)
- Oxford have a PFI arrangement with Agrivert

Envar Composting Ltd therefore will be seeking planning permission for a proposed change of use of land covering the permitted In-Vessel Composting (IVC) Facility into Class B1, E1 and B8 uses (i.e. Light Industrial and Commercial Uses). The London Plan (para 9.9.2) confirms that the potential release of existing waste sites from safeguarding protection should form part of the development plan-led process (rather than be ad hoc via planning applications).

The WLP Proposed Submission has not therefore taken into account Envar's representations to the Regulation 18 response ("*The Assessment of Safeguarded Site to be Released*") that IVC facility area should form one of the sites to be released from waste management safeguarding protection. Envar therefore objects to Proposed Submission WLP by being ineffective and not meeting the tests of soundness.

Relocation of Waste Transfer Station Building

As part of the proposed change of use of the IVC facility (land to the south of New Years Green Lane) to light industrial/commercial uses, Envar Composting Ltd proposes to relocate the existing Waste Transfer Station (WTS) building to the north of New Years Green Lane as shown on drawing extract below - "GPP-E-WLC-COU-26-05 Proposed Relocation of WTS Building".



The relocation of the WTS building will enable Envar Composting Ltd to consolidate and co-locate their entire waste treatment and recycling operations to the north of New Years Green Lane, optimising recycling and providing economic and operational benefits. Consolidating the waste management uses to the north of New Years Green Lane will negate the need for heavy machinery crossing the road regularly throughout the day, reducing time and travel costs. This carries public and employee safety benefits, with improvements in highway safety and business viability opportunities. The relocation of the WTS will also ensure that there is no loss of waste management capacity in the WLP review.

In turn, the change of use of the IVC facility into light industrial/commercial can be properly planned and designed to ensure that the proposed units for employment land provision are suitably attractive to prospective business tenants and avoid incompatible land uses.

Promotion of Land – 'Call for Sites'

The Integrated Impact Assessment for the West London Waste Plan (Regulation 19 Consultation - Final report prepared by LUC May 2026) assessment of the promoted land concluded that:

"With respect to the High View Farm site, this was based on the conclusion that given the lack of additional capacity being proposed and the lack of an identified shortfall in capacity in the WLWP for the apportioned waste, the allocation of the additional land was not necessary or justified."

The Applicant **objects** to the non-inclusion of the promoted land through the call for sites process as part of the response to the Regulation 18 Draft WLP. That submission is enclosed at Appendix 4 to this letter. The promoted land is not only required to improve operational efficiency and meet the requirements of the latest Environment Agency waste management guidance, but it will also provide the potential for an increase in waste management capacity which will be required to meet future growth requirements. One of the main objectives of the West London WLP is self-sufficiency and to avoid transporting waste further afield. The Envar site is the main functioning green waste composting facility in the West London area and a small increase in the operational area of the existing site is the most sustainable option for meeting future green waste management capacity.

On page 65 of the Regulation 18 Consultation Statement document (Version: Final v2.2 28.05.26), an assessment of the Applicant's argument to support allocation is addressed. A response to each of those points is provided below in red.

Addressing each of the justifications for inclusion of Areas1 and 3 as follows:

1) the operation is the only working green waste composting site in West London

- *"This appears to be untrue as there is a consented operational composting facility located at Crow's Nest Farm also located in LB Hillingdon that is safeguarded under the adopted WLWP to provide up to 22,456tpa of capacity for apportioned waste. This site is identified for safeguarding in the emerging WLWP to provide up to 24,900tpa of qualifying capacity for apportioned waste. The WDI 2023 shows the site received just over 10,000 tonnes of waste."*

- Whilst the Crow's Nest Farm is consented to receive green waste, it is a small site, and in practice it does not. It primarily focuses on wood waste and similar recycled products. Envar Composting Ltd supplies

Crow's Nest Farm with compost as part of its nearby green waste composting operations. Crow's Nest Farm does not recycle green waste through open windrow composting. Whilst there is a theoretical green waste capacity of 22,456 tpa, the real position is that the site does not compost green waste at all.

- Crow's Nest Farm is also in a less favourable location than New Years Green Lane for green-waste composting because it is significantly closer to sensitive receptors, including residential properties. That distinction is material: section 4.1 of the Environment Agency's Biological Waste Treatment Appropriate Measures requires potential impacts on local sensitive receptors to be considered and fugitive emissions, including odour, dust and bioaerosols, to be prevented or minimised.

2) **the local population is growing, and this will lead to more waste being produced. More people mean more homes, more gardens, and more green waste.**

- "*This not necessarily the case, if the provision of homes is through multi-occupation buildings such as flats.*"

- Whilst it is accepted that flats may generate less green waste per dwelling than houses with private gardens, it is not reasonable to assume that high-density residential growth generates no additional green waste. Significant housing growth is planned across West London, including at Old Oak, and those developments must incorporate and maintain landscaping, public open space, play space, trees, green roofs, sustainable drainage and other green infrastructure. The maintenance of green areas/community space will generate grass cuttings, pruning arisings and other green waste. The overall demand for local green-waste management is therefore likely to grow rather than disappear.

- The development plan expressly requires green space in high-density and flatted schemes. London Plan (2021) Policy G5 requires urban greening to be a fundamental element of major development and recommends an Urban Greening Factor target of 0.4 for predominantly residential schemes; paragraph 8.5.2 states that ongoing management and maintenance should be secured. Policy S4 requires residential development to provide at least 10 m2 of play space per child, incorporating trees and/or greenery, while Policy G4 promotes the creation of publicly accessible green space. At Old Oak specifically, the adopted OPDC Local Plan (2022) Policies SP8 and EU1 require a minimum of 30% of the developable area outside Strategic Industrial Locations to be publicly accessible open space, including two new local parks of at least 2 hectares, smaller open spaces, pocket parks and green streets, together with long-term management and maintenance arrangements.

- The Hillingdon Local Plan Part 2 reinforces the same point. Policy DMHB 18 requires flats to provide at least 20 to 30 m^2 of private outdoor amenity space depending on the number of bedrooms, and paragraph 5.74 requires outdoor amenity space to provide an appropriate mix of hard and soft landscaping, including grass, shrubs and trees. Policy DMCI 4 requires major residential development to provide new open space or enhance existing open space. More broadly, London Plan Policy SI 7 seeks at least 65% municipal-waste recycling by 2030, while Policy SI 8 requires the equivalent of 100% of London's waste to be managed within London, safeguards existing waste-management sites and requires their capacity to be optimised. It is therefore not sound to dismiss the additional green arisings associated with housing growth merely because a proportion of the new homes will be flats.

2) **Environmental Permitting means green waste composting operations now needs more space than it used to.**

- "*A review of the environmental permit relating to the site varied in 2019 to include in vessel composting alongside a waste transfer station and the existing open windrow composting operation shows that much of the additional requirements emanate from the inclusion of the IVC facility, which the operator now says is redundant (and wishes to remove), hence it appears that any additional demands of continuation of the green waste composting operation will not be great as to require expansion.*"

- The suggestion that the space requirements largely disappear with the IVC is incorrect. The relevant question is not which plant prompted particular requirements in 2019, but what physical area the continuing open-windrow activity now needs in order to operate safely and lawfully under the current permit and current regulatory standards. Section 4.3 of the Environment Agency's Biological Waste Treatment Appropriate Measures requires an operator to determine the actual physical capacity needed to manage, treat and store waste without causing pollution, taking account of seasonal changes in feedstock supply and output markets, and to provide enough space for safe operation, storage and treatment.

- Open-windrow composting is intrinsically land intensive. Unlike IVC, it does not use enclosed vessels and forced aeration to accelerate the active phase. The working pad must accommodate receipt and blending, shredding, active windrows, turning lanes, screening, maturation, quarantine and product storage, together with safe vehicle and emergency access. Its longer residence time and reliance on repeated mechanical turning mean that more pad area is needed per tonne of throughput than for the former IVC process. For separately collected green waste, the process also avoids the energy demand associated with forced aeration and enclosed-air abatement.

- Space for maturation and product finishing is essential to produce a stable, usable PAS 100 compost. The Environment Agency's Compost from Waste: Resource Framework (October 2025) introduced tighter physical-contaminant controls, making effective picking, screening and separation increasingly important. These operations require dedicated equipment and safe working areas. The finished compost is a soil improver and its use supports the Government's wider soil-health and resource-efficiency objectives, including those in the Environmental Improvement Plan 2023.

- Additional contained storage is also necessary where seasonal or weather-related restrictions delay the use of compost on land. The Appropriate Measures guidance requires storage areas to be large enough for foreseeable changes in feedstock supply and the ability to dispatch outputs (section 7, paragraph 15), requires contingency planning for restrictions affecting the spreading of compost to land (section 5.10), and requires waste storage on impermeable surfacing with contained drainage (section 7, paragraph 3). This is especially relevant at New Years Green Lane because of the local groundwater and surface-water sensitivity and the site's legacy landfill setting.

- Adequate space also directly assists odour control. Smaller, properly formed windrows with sufficient room for turning and moisture management are easier to keep aerobic; overcrowding or delayed turning

increases the risk of anaerobic conditions and odour. This is consistent with Appropriate Measures section 4.3, which requires enough space for environmentally safe treatment and storage.

- Fire prevention and emergency response create further land-take requirements. Appropriate Measures section 5.7, paragraph 8 specifically requires enough space between compost windrows for turning, cooling and safe access in the event of a fire.

4) **Fire safety rules require set-aside areas for quarantine, emergency access, and separation between stockpiles. These areas reduce usable working space and therefore increase the amount of land needed to keep the same level of activity.**

- *"A review of the Environment Agency Fire Prevention Plan Guidance shows that it is only intended to apply in part to biowaste treatment operations such as open windrow, and in vessel composting, so additional requirements may not necessarily apply."*

- The Applicant's bespoke installation permit requires an up-to-date Fire Prevention Plan (FPP). Section 5.7 of the Environment Agency's Appropriate Measures guidance applies fire and explosion prevention requirements to all processes, with paragraph 8 imposing additional measures specifically on composting plants. These include sizing windrows so passive heat convection is not inhibited, monitoring temperatures, optimising moisture, and providing enough space between windrows for turning, cooling and safe access in the event of a fire.

  https://www.gov.uk/guidance/biological-waste-treatment-appropriate-measures-for-permitted-facilities/5-general-management-appropriate-measures

  Section 4 of the Environment Agency's FPP guidance expressly identifies the following as combustible waste:
  "compost and plant material".
  The generic maximum pile dimensions do not apply while material is actively managed and monitored during composting, but they do apply to waste stored before and after active composting (FPP guidance, section 10.3). The guidance also requires separation distances for stored combustible waste and a quarantine area capable of holding at least 50% of the largest pile with 6 m clearance (sections 11.1 and 12). High View Farm's Environment Agency-agreed FPP therefore imposes real spatial requirements; it is not a generic document with no effect on the land required for the operation.

  https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits/fire-prevention-plans-environmental-permits

  Just because the FPP guidance applies to a wide range of waste management facilities does not mean that there is any relaxation for sites that recycle green waste. Measures include:

  - ✓ **Stock Rotation**: Apply a clear "first in, first out" recording system to ensure combustible materials do not exceed storage time limits. Comply with maximum pile sizes and separation distances.
  - ✓ **Self-Combustion Control:** Green materials and compost present self-heating risks and should generally be stored for no longer than 3 months

- ✓ **Temperature Monitoring**: Monitor internal pile temperatures regularly to detect and prevent self-combustion.
- ✓ **Quarantine Areas**: Maintain an isolated quarantine space to immediately move and douse smouldering or hot loads.
- ✓ **Fire Spreading Prevention**: Provide adequate separation distances between static combustible storage piles

5) **Tighter compost quality rules, mean extra screening and separation equipment is now needed. This takes up space and creates new working areas.**

- *"Review of the Compost from waste: resource framework published by the Environment Agency in October 2025, does show that there may be additional requirements to screen out plastics from resultant compost. But the prevention of plastic contamination should primarily occur at the point of waste receipt."*

- Although source separation and load inspection are essential, that process cannot eliminate physical contamination from household and commercial green waste. Controls at kerbside are not within Envar's operational control. The site must therefore retain hand-picking and mechanical screening to meet the Compost from Waste: Resource Framework and PAS 100 product requirements. The Environment Agency's Appropriate Measures also require sufficient physical capacity for safe operation (section 4.3), and require waste areas and process flow to be designed to prevent cross-contamination (sections 4.2 and 7). Picking and screening activities therefore require dedicated, safely accessed working areas and have a real land-take.

- Segregation of picking areas from vehicle routes and other processing activities is also necessary to maintain safe working conditions, further reducing the net area available for windrows and storage.

For the reasons set out above, the Proposed Submission WLP is not sound (effective) and does not meet the tests of Policy PM15 (Examining local plans and minerals and waste plans) of the NPPF.

If you have any queries, please do not hesitate to contact me.

Yours sincerely,

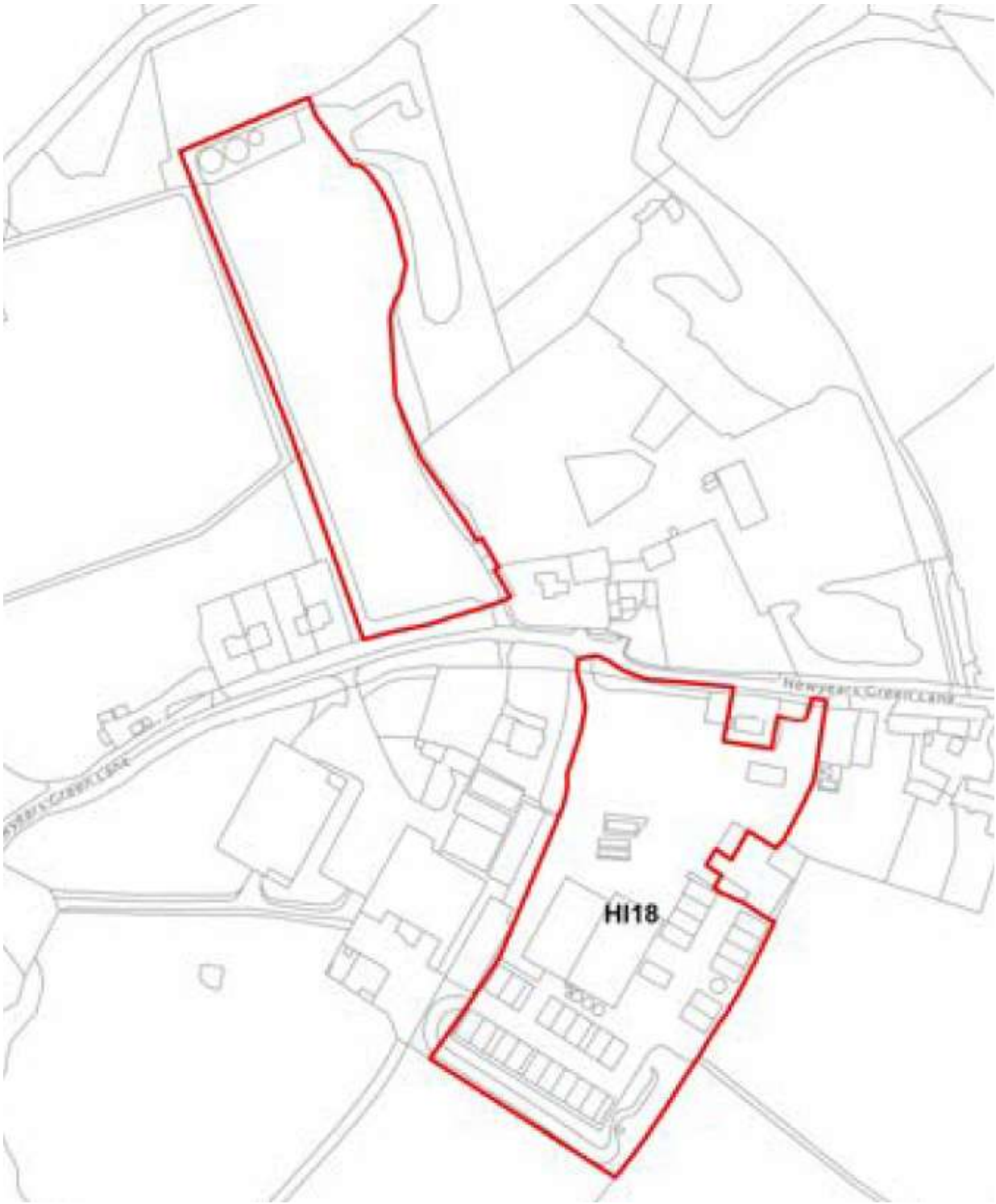
Christian Smith, MRTPI
[redacted]

APPENDIX 1 – HI 18 - SAFEGUARDED LAND AT HIGHVIEW FARM

APPENDIX 1

West London Composting – Existing Safeguarded Land (HI 18)

(Appendix 3 – Maps of Safeguarded Waste Sites)



APPENDIX 2- LAND WITH PLANNING PERMISSION TO BE SAFEGUARDED

All dimensions to be verified on site. Figured dimensions to take precedent to those scaled. Any areas indicated on this drawing are for guidance only, no responsibility is taken for their accuracy.

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KEY

- Proposed Extension Boundary
  Area Measurement: 72011.3327 sqm / 7.201133 ha
- Other land within client's ownership
- Existing Site Boundary

Grid Reference: X 507044 Y 188448
Postcode: UB9 6LX

N

Rose Farm House
Pond
BREAKSPEAR ROAD NORTH
Oak Cottage
Pond
Drain
Pond
Pond
Tanks
Track
Ponds
Pond
Path (um)
Track
Drain
Entrance
St Leonard's Farm
Newyears Green
Track
BREAKSPEAR ROAD NORTH
Hs2 Construction Site
4 3
2 1
Exit
Highview Bungalow
Entrance
Highview Farm
NEWYEARS GREEN LANE
NEWYEARS GREEN LANE
Pylon Farm
Ruins
ENVAR - WEST LONDON COMPOSTING
Mast (Telecommunication)
Elm Tree Farm
Newyears Green
Waste Transfer Station
Track
Pond
Pond
Tanks
Tank
The Shrubs
New Years Green Farm
6 8
Newyears Green
EB Sub Sta
Track
Track

Rev	Description	Initial	Date
04	Other land within client's ownership added to the south.	KD	04/03/24
03	Planning application boundary increased to the west and north west.	KD	23/01/23
02	Planning application boundary amended to the north west.	KD	21/11/22
01	Other land within client's ownership added.	KD	19/10/22

GPP GP PLANNING LTD

Planning Consultants

[redacted]

Registered in England No. 6019666

TITLE:	Proposed Extension at Envar - West London Composting, Newyear Green Lane, Harefield, Uxbridge Site Location Plan
CLIENT:	ENVAR COMPOSTING LIMITED

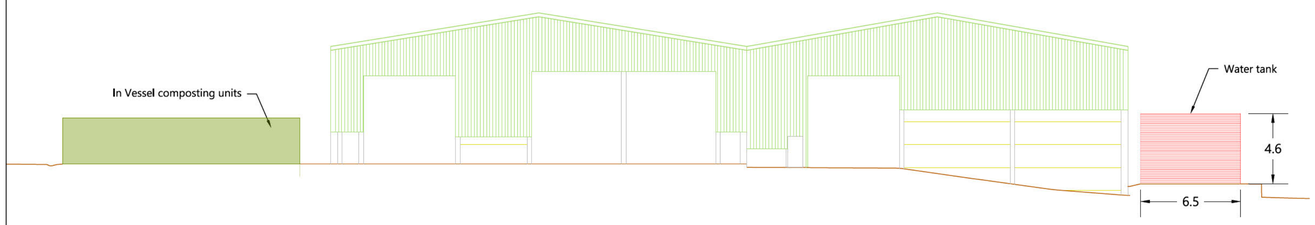
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DRAWN BY:	KD	CHECKED BY:	CS
DRAWING NO.:	GPP/E/WLC/EX/22/01	REV NO.:	04
SCALE:	1:1250 at A1	DATE:	10 Oct 2022
SCALE BAR:	0 10 20 30 50 100		

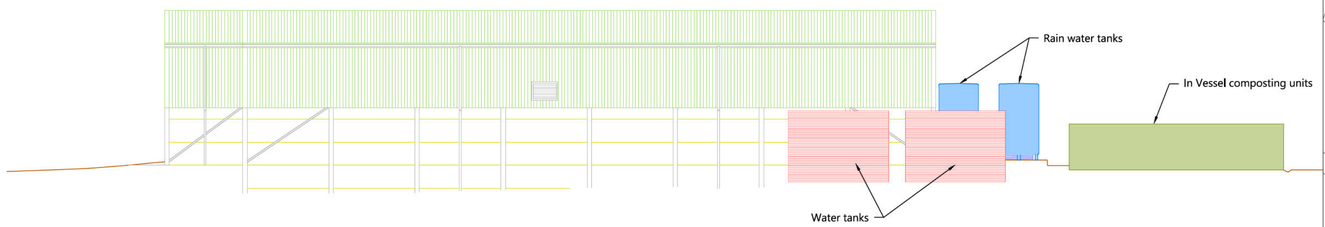
ORIGINAL A1 SIZE SHEET

APPENDIX 3 – ELEVATIONS OF IVC FACILITY

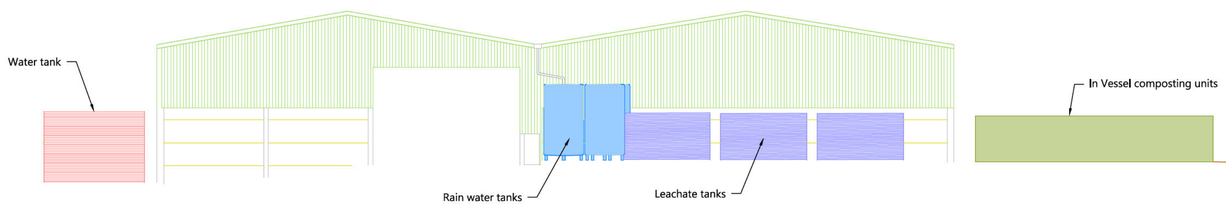
1 Northern elevation. Scale 1:200



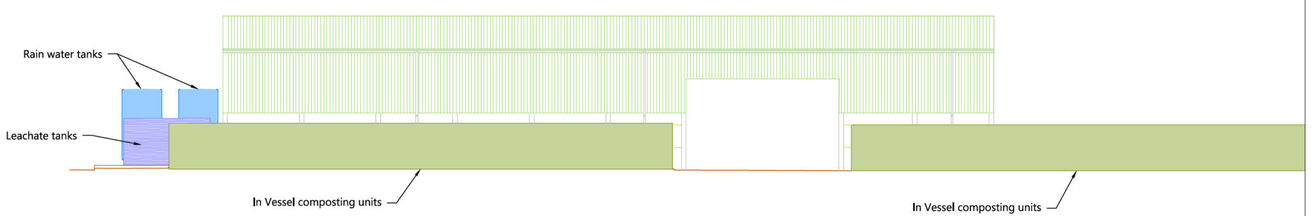
2 Western elevation. Scale 1:200



3 Southern elevation. Scale 1:200



4 Eastern elevation. Scale 1:200



Plan showing elevation view locations.
Scale 1:500



NOTES

Based on topographic survey undertaken on October 2020

LEGEND

0 5 10 15 20m

GRAPHIC SCALE 1:200

0 10 20 30 40 50m

GRAPHIC SCALE 1:500

PROJECT TITLE

WLC

PROJECT NUMBER

30408

CLIENT

West London Composting Ltd

LOCATION

Newyears Green Ln, Harefield, Uxbridge UB9 6LX

DRAWING TITLE

Elevations - Southern Site

REVISIONS

Rev	Date	Chkd	Description
0	02/07/2021	DB	First issue

DESIGNED	RWS	DRAWN	RWS
SCALES @ A1	As Shown	DATE	02/07/2021

CQA INTERNATIONAL LTD

DRAWING NUMBER 30408/WLC/SM/04a

REV 00

APPENDIX 4 – REGULATION 18 – RESPONSE TO 'CALL FOR SITES' PROMOTION

The Applicant responded to the Call for Site Form together a plan (reference GPP-E-WLC-COU-26-06 (see plan below text) showing the proposed two new areas (edged red) to be included within the WLP for making provision for additional green waste composting capacity. Drawing reference GPP-E-WLC-COU-26-06 also shows other land within Envar Composting Ltd's ownership outside of the existing planning permission (reference 39755/APP/2023/652) edged with a blue line.

Envar Composting Ltd proposes to promote three new areas adjacent to the existing planning permission.

1. Area 1 - A northerly extension to the existing planning permission reference 39755/APP/2023/652 for green waste composting, which measures 1.12 hectares in size,
2. Area 2 - An easterly extension adjacent to the weighbridge for the parking of vehicles/plant and machinery, which measures 0.16 hectares in size,
3. Area 3 - An easterly extension to the existing planning permission reference 39755/APP/2023/652 for green waste composting, which measures 0.43 hectares in size

Justification for Areas 1 and 3 – Extension to Green Waste Composting Operations

Firstly, in terms of context, the West London Green Waste Composting operation (part of the Envar group) is the only working green waste composting site in the West London and Greater London area.

Other waste management sites that can take the same green waste streams are a long way away. Transporting green waste from the West London and Greater London area to the other sites means longer lorry journeys, more fuel use, higher air quality emissions, higher costs, and a weaker local waste recycling system. This demonstrates the strategic importance of the Envar site for managing green waste streams from the West London and Greater London area in line with the proximity principle and net self sufficiency.

Secondly, the local population is growing, and this will lead to more waste being produced. Census figures show that Hillingdon's population grew by around 12% between 2011 and 2021, which is faster than the London and national average. More recent estimates show the population is now over 310,000 and still rising. More people mean more homes, more gardens, and more green waste. At the same time, Local Authorities are expected to recycle more and send less waste for disposal. Maintaining and increasing capacity at existing sites, whilst meeting modern day environmental standards, complies with the thrust of emerging Policy WLWP 1 (Safeguarding and Optimising the Waste Site Network) of the draft WLP.

Thirdly, modern Environmental Permitting Regulations means green waste composting operations now needs more space than they used to. The recently updated Environment Agency's guidance (Appropriate Measures) requires lower pile heights, wider gaps between stockpiles, stronger fire controls, and more space between different work areas to manage odour, dust and fire risk. Put simply, more land is now needed to treat the same amount of waste safely and lawfully than in the past.

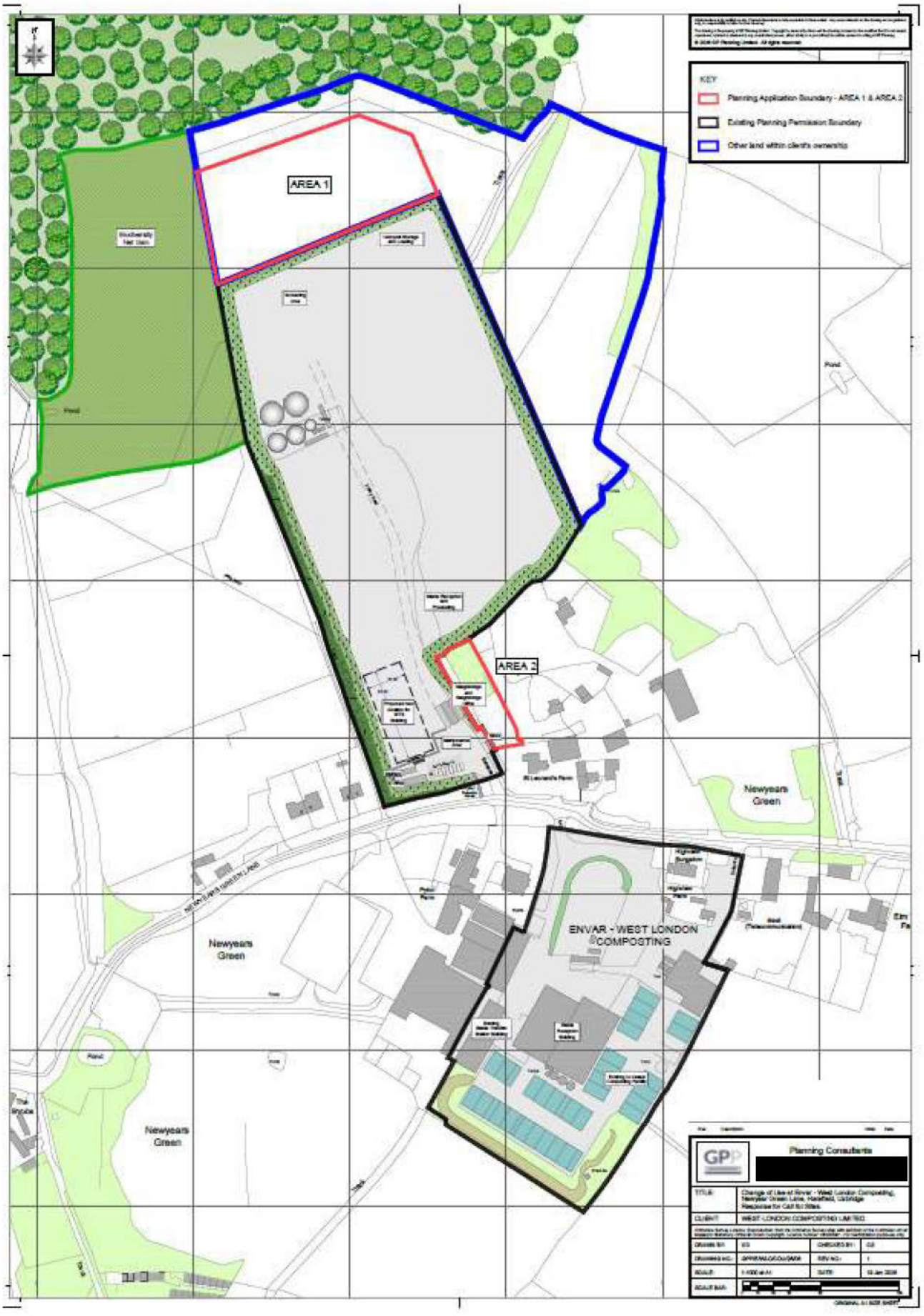
Fourthly, fire safety rules require set-aside areas for quarantine, emergency access, and separation between stockpiles. These areas are essential for safety but are not available to process waste. They reduce usable working space and therefore increase the amount of land needed to keep the same level of activity.

Fifthly, tighter compost quality rules, including the reduction in allowed physical contamination to 0.06% by weight, mean extra screening and separation equipment is now needed. This takes up space and creates new working areas. Without some extra land, meeting these rules will slowly reduce how much waste the site can realistically handle.

Finally, allocating land to the north of New Years Green Lane will make sure today's composting levels can still be met in the future, even as rules tighten, standards rise, and waste volumes grow. Without the extra land, the site's real working capacity will slowly shrink simply because more space is needed to stay compliant with the suite of waste related regulations. It is worth noting that the required buffer between the woodland and the site should be maintained as per the legislation in force at the time.

Justification for Area 2 – Vehicle Parking/Storage of Plant/Equipment

Envar owns land to the east of the existing green waste composting operation. Due to the reasons for needing more space for the green waste composting operations set out above, the small area to the east (as shown on drawing reference GPP-E-WLC-COU-26-06 would enable Envar to park vehicles, plant and equipment adjacent to the main operations.


KEY
Planning Application Boundary - AREA 1 & AREA 2
Existing Planning Permission Boundary
Other land within client's ownership
AREA 1
AREA 2
Newyears Green
ENVAR - WEST LONDON COMPOSTING
Planning Consultants

creating a better place
for people and wildlife

Environment Agency

Planning Policy Team
London Borough of Ealing
14-16 Uxbridge Road
Ealing
W5 2HL

Email: planpol@ealing.gov.uk

Date: 24 September 2026

Re: West London Waste Plan Regulation 19

Thank you for consulting us on the West London Waste Plan (WLWP) Regulation 19 consultation delivered collaboratively by the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames.

We have reviewed the WLWP Regulation 19 submission and associated documents and have examined the challenges, opportunities and key policy themes presented, in consideration of the environmental constraints within our statutory remit.

We are generally supportive of the proposed WLWP and pleased that many of our comments to the Regulation 18 have been made within this submission.

Policy WLWP 1: Safeguarding and Optimising the Waste Site Network

8.8. '*For the purposes of this Plan, existing waste sites are defined as land that meet at least one of the following conditions:*

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

We recommend that the final bullet point is made clearer. For example, if the aim is to ensure that industrial facilities aren't forced out of business by the loss of an ancillary waste activity such as storage we would find this acceptable, but any 'ancillary' capacity should not count towards apportioned waste capacity or be included in an overall capacity assessment for the WLWP area as it would not be primarily a waste management operation.

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

We recommend that the capacity for waste transportation should be retained. This links to paragraph 8.24 which states 'Preferred locations are therefore those close to railheads and wharves that can be used for waste transport and/ or close to the strategic road network'.

Policy WLWP 2: Provision of Additional Waste Management Capacity Emerging Capacity Needs

3. Hazardous Waste. *'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.'*

Hazardous waste should be an exception to the rule as they are often of greater than regional significance, so outside of the London Area should be a consideration too.

Policy WLWP 3: Residual Waste Management & Energy Recovery

A.2. '*the proposals are in accordance with the proximity principle'*.

We recommend the inclusion of sustainable transport solutions in its definition to mirror the sending of waste by West London Waste Disposal Authority by rail to Avonmouth.

A.3. '*a need for the capacity to serve west London will exist for the lifetime of the proposed facility*'.

In the assessment of the 'need' for capacity the tonnages associated with the long-term contract that West London Waste Disposal Authority has with Suez should be taken into account. i.e. those tonnages do not meet the 'need' for West London's waste within their boundary.

Proposed Submission West London Waste Plan: Assessment of Existing Waste Sites for Release document

20. '*All London Boroughs were invited to submit representations through the formal consultation on the Regulation 18 Draft Updated WLWP and some requests were received in response to this. As per Paragraph 9.8.6 of the London Plan, the LPAs intend to continue engagement in relation to these requests and will, as a starting point seek to make the equivalent amount of capacity available as provided by the sites to be released (as a minimum). For the Proposed Submission WLWP to be sound, any arrangement must be based on robust evidence. Therefore, these Boroughs have been invited to demonstrate, amongst other matters, that all other avenues of making provision within their respective Plan areas have been thoroughly explored*'.

We have concerns regarding the two sites being released at the Neasden Stations sites, as they represent a fairly significant tonnage of construction, demolition and

excavation (CDE) waste transfer capacity. However, we acknowledge they are part of a much larger masterplan for developing the area.

Waste Management Topic Paper document

In the 'Providing for Waste From Beyond the Plan Area' section, there is no mention of contact with waste planning authorities outside of London.

We recommend engagement with the regional technical bodies for waste management - the South East Waste Planning Advisory Group and the East of England Waste Technical Advisory Body, as both these areas receive significant tonnages of waste from West London.

Proposed Submission West London Waste Plan Strategically Significant Waste Flows document

3.14. *'For the purpose of this exercise, a value of over 20% i.e. a fifth of the total arising of each waste type has been taken as a threshold of significance'.* We believe this percentage is too high as some waste movements which haven't been highlighted in the table should be:

- Table 5: Mixed municipal waste – Slough
- Table 5: Process residues – Thurrock
- Table 6: Inert waste
- Table 6: Soil and stones – Herts, Peterborough and Warwickshire

We recommend that the above should be included as they are significant tonnages.

Assessment of Existing Waste Capacity in West London 2025 document

2.4. An Operator Survey was conducted to obtain capacity figures for some sites and the capacities obtained from planning permissions were used in the calculation of the site capacities.

We understand that these have been used primarily instead of waste data interrogator (WDI) and other data sources. In the assessment of site capacities, we believe that the WDI figure should be used primarily as this represents a 'real world' operational figure, as many sites are limited in their operational capacity to one below their planning or a theoretical operational maximum for compliance reasons. Surveys of operators tend to be optimistic and sometimes based on commercial aspirations rather than what may realistically be achieved on a site bearing in mind planning and permitting issues.

Flood Risk

We are satisfied that our previous comments have been incorporated. No further comments are necessary at this time.

We hope that you find our comments useful, and we would be pleased to meet with you to discuss in more detail any issues or queries you may have.

Our aim is to assist you prepare and implement a sound, robust, and effective plan that is reflective of national policy and your local up-to-date evidence base. We hope that this collaborative process leads to a plan that delivers sustainable development, contributes to a stronger economy, and safeguards the environment for future generations.

Charged Advice Service

For non-statutory consultations, the Environment Agency offers a discretionary charged advice service. As part of this service, we can provide advice on your evidence base, planning policies, site allocations etc. that are relevant to our planning remit. This service offers a dedicated project manager and access to expert advice from our internal technical teams which can help resolve any environmental concerns relevant to our remit and avoid the need for us to raise soundness concerns at the statutory consultation stage. For more information or to request access to this service, please email: HNLsustainableplaces@environment-agency.gov.uk.

Further information on our charged planning advice service is available at: Planning and marine licence advice: standard terms for our charges - GOV.UK

Final comments

Thank you again for seeking our representation on the West London Waste Plan Regulation 19. We trust that the comments presented in this letter are clear and informative and would welcome the opportunity to meet with you to discuss in more detail any issues or queries you may have.

Should you have any queries regarding this response or require additional information or guidance on any of the points raised, please do not hesitate to contact me.

Yours sincerely,

Charlotte Mann
[redacted]

wlwasteplan

From: Rob Slater [redacted]
Sent: 01 September 2026 11:49
To: wlwasteplan
Subject: London Waste Plan Consultation

WARNING : This Message has originated from outside your organization, If you do not trust this email please either delete or follow the guidance on OneSpace.

Hello,

In response to the above consultation, Essex County Council has no further comments to make.

Kind regards,

Rob Slater BSc (hons)
[redacted]

[redacted]
Essex County Council

[redacted] | www.essex.gov.uk

Consultation on the Proposed Submission West London Waste Plan

From 4th August to 28th September 2026

RESPONSE FORM

The London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond-upon-Thames and the Old Oak and Park Royal Development Corporation are inviting comments on the Proposed Submission West London Waste Plan (WLWP).

The Proposed Submission WLWP sets out the proposed planning strategy for waste management in the plan area up to 2041, including identifying sites proposed to be safeguarded for waste use.

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

- Policy WLWP 1 – Safeguarding Waste Sites
- Policy WLWP 2 – Provision of Additional Waste Management Capacity
- Policy WLWP 3 – Residual Waste Management and Energy Recovery
- Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities
- Policy WLWP 5 – Recovery and Disposal of Waste to Land
- Policy WLWP 6 – Circular Economy and Resource Efficiency
- Policy WLWP 7 – Wastewater Treatment Infrastructure

This consultation is the final opportunity to comment on the Proposed Submission WLWP before it is submitted to the Secretary of State for independent 'examination in public'. We would like to hear views from our local communities, businesses and other stakeholders. At this stage in the plan making process, in accordance with the national guidance, consultation responses should focus on whether the WLWP has been developed in compliance with the relevant legal and procedural requirements, including that the plan should be in general conformity with the London Plan, and the 'soundness' of the Plan. A guidance note and answers to Frequently Asked Questions provide further detail on these terms – this document is available on the online consultation portal (via the link below) alongside other supporting information.

How to respond

All the information needed to take part in the consultation can be found on Ealing Council's online consultation portal: https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation This includes the Proposed Submission WLWP, maps and all supporting evidence. Printed copies of the Plan and key supporting documents will also be available to view at the west London Boroughs' and OPDC's main offices and selected venues in the WLWP plan area. For further information on these, please visit the online consultation portal.

You can comment on the consultation documents in the following ways:

- Online questionnaire on the consultation portal https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation
- Email a response form to WLWastePlan@ealing.gov.uk a PDF and Word version of the form can be found at

https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation . In the form, in 'Word' format you can type in your response and return it as an email attachment.

- Complete and post printed copies of the response form to the address given below. Printed copies are available at the selected locations listed on the consultation portal.
- Post written responses to:

  Planning and Infrastructure
  West London Alliance
  Ealing Council
  5th Floor, Perceval House
  14-16 Uxbridge Road
  Ealing, W5 2HL

All responses must be received by 23:59 on Monday 28th September 2026.

This form has two parts:

- Part A – Personal details and About You
- Part B – Your detailed response(s).

If you wish to comment on multiple documents or sections of the plan or supporting material, then we recommend that you download and use a separate Part B form for each comment and attach these to your postal response or email.

Part A: Personal Details		
	1. Personal Details *	**2. Agent's Details (if applicable)**
Title	Mr	
First name	Frederick	
Last name	Bomford	
Job title (where relevant)	[redacted]	
Organisation (where relevant)	FM Conway Ltd	
Address	[redacted]	
Postcode	[redacted]	
Telephone	[redacted]	
E-mail address	[redacted]	

*If an agent is appointed, please provide the full contact details of the agent plus the person (title, name) or organisation they are acting for.

Part A: About You…	
3. Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]
Other - please state what your specific interest in west London might be.	

Data protection

We will ensure that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure.

The Privacy Statement is published on the webpage https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

All responses will be held by the London Borough of Ealing. Responses will not be treated as confidential and will be published on its website and in any subsequent statements, attributed by name and/or organisation; however, personal details like address, phone number or email address will be removed.

If you submit comments, your consultation responses and personal data will be passed to the Planning Inspectorate and a Programme Officer. The Programme Officer manages the procedural and administrative aspects of the examination. The Programme Officer will contact you using the personal information you have provided if you have indicated in the response form your wish to engage in the Examination.

Part B: Your Detailed Response			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
If you have more detailed comments to make on what the Plan should contain, please download the form, Part B– Additional Responses Continued, or print additional versions of this form, being clear about page numbers, paragraphs or infographics to which they apply, and append to your response form.			
Documents		**Sections**	
Proposed Submission West London Waste Plan		Page number(s)	**See below comments**
		Paragraph number(s)	
		Policy no./name	
		Site no./ name (see Appendices to the Plan)	
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)		Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment		Page number(s)	
		Paragraph number(s)	

There is no Part B – Additional Reponses Continued, so placing information here.

Overall, the Regulation 19 Consultation appears to be written in accordance with national guidance and in compliance with the relevant legal and procedural requirements.

- Do not compromise safe guarded waste infrastructure
- Maximise reuse and recovery of construction material
- Prevent pollution to land and water
- Minimising transport impacts
- Demonstrating strong environmental management and circular economy.
- Good to see Heathrow Recycling listed as a safeguarded site in the new waste plan. Please note Heathrow Asphalt Plant will be operated by Conway Eurovia Industries Limited (CEIL) as of Jan 1st 2027 and not FM Conway Ltd (Change of name only).
- Capacity. The figure in the plan seems about right, although we have scope to increase our capacity subject to some operational improvements. 300,000tpa is a reasonable figure (230kt RAP production, 40kt sub-base production, 30ktpa coal tar storage & transfer).
- Quantity of hazardous waste from West London seems to be underestimated. Only 3,996 of hazardous bituminous waste shown in Appendix 11 Table 5. This is based on our experience of handling waste arisings from highways contracts in West London.

Under West London Waste Plan Proposed Submission A5.6:

Different types of C, D & E waste require different forms of management. For example, hard inert materials (such as concrete, brick and road scrapings arising from demolition and road maintenance) can be recycled for use as an aggregate, while soft materials such as soils and sub-soils can be used for beneficial purposes such as the restoration of minerals workings and in other engineering projects. The non-inert component includes timber, plasterboard and plastics which may be recycled if Regulation 19 Proposed Submission West London Waste Plan Page 196 separated. Ultimately there is very little C, D & E waste that cannot be recycled or recovered in some way.

Our concern with this text is that specifically grouping all "road scrapings" with concrete and brick as **hard inert materials** is too broad. The wording should distinguish:

- Non-hazardous bitumen-based asphalt planings, 17 03 02
- Hazardous asphalt containing coal tar, 17 03 01*
- Any genuinely inert road materials

It should also recognise scrapings (or even planings) reuse in asphalt as RAP, rather than referring only to recycling as aggregate. It should also specify that RAP is a high value product (therefore not downcycling) which should be prioritised.

5. Do you consider the West London Waste Plan is:

5.1 Legally compliant	Yes ☐	
5.2 Sound	Yes ☐	

Further information on these terms is included within the guidance note and answers to Frequently Asked Questions available on the website at https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.

N/A

Please continue on a separate sheet / expand box if necessary.

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

Please continue on a separate sheet / expand box if necessary.

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.*

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐ **No**, I do not wish to participate in hearing session(s)	

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

N/A

10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the West London Waste Plan.

If you do not wish to be notified of future updates on the West London Waste Plan, then please tick this box, complete Part A: Personal Details of this form and return it to us. Note your name, business (if entered) and response will still be published in the consultation report.	

Signature:	Frederick Bomford	Date:	24/09/2026

For electronic responses a typed signature is acceptable.

GREATER**LONDON**AUTHORITY

Anthony McNamara
West London Alliance
Ealing Council
5th Floor, Perceval House
Ealing, W5 2HL

By email: WLWaste@ealing.gov.uk

Department: Planning
Our reference: LDF37/WP02/HA01
Date: 25 September 2026

Dear Anthony,

Planning and Compulsory Purchase Act 2004 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012

RE: Consultation on the Proposed Submission version (Regulation 19) of the West London Waste Plan

Thank you for consulting the Mayor of London on the Regulation 19 version of the West London Waste Plan. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below.

The Mayor provided comments on the Regulation 18 draft of the West London Waste Plan (WLWP) on 19 March 2026 (Ref: LDF37/LDD01/WP01/ES01). GLA officers met with the West London waste planning group to discuss the draft plan and the group have since provided a written note providing clarification on several matters raised in the Regulation 18 response. This letter follows on from earlier advice and sets out where further amendments are considered necessary so that the draft Plan is in general conformity and more closely aligned with the London Plan 2021 (LP2021). These comments should be read alongside the Mayor's previous response.

The LP2021 was formally published on 2 March 2021 and forms part of all the West London waste planning boroughs' Development Plans and contains the most up-to-date policies. The WLWP is required to be in general conformity with the current London Plan, and it is understood that the waste planning group intends to submit the Local Plan by the end of 2026. The Mayor published his draft new London Plan for consultation on 16 July 2026, and it is anticipated the Examination in Public of the London Plan will take place in summer 2027 with publication in early 2028. It is important to note that policies in the draft new London Plan gain more weight as it moves towards publication in 2028.

General

LP2021 Policy SI8(B) requires boroughs to plan for identified waste needs and to allocate sufficient sites, identify suitable areas, and identify waste management facilities to manage the apportioned tonnages of waste set out in Table 9.2. The WLWP covers the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond-upon-Thames, as well as the Old Oak and Park Royal Development Corporation (OPDC). These boroughs have a pooled apportionment of 2,221,000 tonnes per annum (tpa) to 2041.

Against this requirement, the draft Plan identifies that West London will have a capacity of 2,578,741 tpa by 2041, based on the combined capacity of the boroughs. According to Table 2 of the draft WLWP, this is forecast to result in a surplus of approximately 357,000 tpa. We commend the draft WLWP for its positive approach to planning for identified waste needs and meeting the LP2021 apportionment targets.

However, it is the Mayor's opinion that as currently written the draft WLWP is not in general conformity with the LP2021 due to the proposed release of six safeguarded waste sites without providing compensatory capacity combined with the failure to offer surplus waste handling capacity to those boroughs in London with a shortfall in the ability to meet their waste needs prior to the release of the identified sites. Further details are provided in the relevant section of this letter. We would welcome further discussions on these aspects of the draft WLWP prior to it being submitted for examination.

Policy WLWP 1 – Safeguarding and Optimising the Waste Site Network

In his Regulation 18 response, the Mayor raised a potential general conformity concern that part G of the policy could have led to the ad hoc release of safeguarded waste sites. This element of the policy has now been removed and that is noted and welcomed.

Paragraph 7.1 of the draft Plan notes that following representations received in response to the Regulation 18 consultation, the tonnages attributed to some sites safeguarded in Appendix 2 have now been updated. These amendments are noted and welcomed. It is now clearer that the approach for assessing waste handling capacity is more closely aligned with the approach in the LP2021 in that it uses the WDI five-year peak capacity as the starting point for the assessment and then reviews this alongside other relevant site-specific information to generate site specific capacity values.

This clarification sufficiently addresses the Mayor's concern raised in his Regulation 18 response that the waste group may not have had the capacity to meet the LP2021 apportionment targets. Related to this, it is noted that Part D of Policy WLWP 1 is explicit that where a safeguarded waste site is proposed to be redeveloped for waste uses, the capacity of the redeveloped site must be less than the assessed capacity of the site as set out in Appendix 2 unless it will be demonstrably result is waste being managed further up the hierarchy. This provides greater certainty that the estimated operational capacities of the sites as relied on to satisfy LP2021 apportionment requirements will be safeguarded over the plan period.

Part F of Policy WLWP 1 sets the approach to considering applications for redevelopment of safeguarded waste sites for non-waste uses. While Part F takes the assessed capacity of the existing site as set out in Appendix 2 as the starting point for determining the replacement capacity required (which is consistent with Part D of WLWP 1), this approach differs from the approach set out in LP2021 Policy SI9(C). This states that appropriate compensatory capacity must at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost, with paragraph 9.9.2 stating that the maximum throughput over the last five years should be used.

Part F goes on to state that when assessing compensatory capacity a degree of weight will also be given to the site's particular circumstances; consented throughput capacity; reported throughput; and wider market conditions. The Mayor is concerned that as currently drafted the approach would weaken the WLWP's ability to effectively safeguard waste handling capacity to meet the LP2021 waste apportionment targets and other evidenced waste need. While paragraph 8.19 provides some guidance, it is unclear how and when these additional

considerations would be applied. In order to effectively protect safeguarded waste capacity and ensure appropriate compensatory capacity is provided, the policy and/or supporting text should be updated so that expectations are clear for applicants and decision makers.

There are discrepancies between the LP2021's definition of a waste site and the draft WLWP's definition. Paragraph 9.9.1 of the LP2021 defines a waste site as land with planning permission for a waste use or a permit from the Environment Agency for a waste use. However, Part B of Policy WLWP 1 defines waste sites as those subject to planning consent of CLEUDs for a waste use, or deemed lawful in planning terms. As per paragraphs 8.8 and 8.9, the WLWP definition excludes sites with an Environmental Permit and includes sites where the waste use is ancillary to a wider lawful use. As stated at Regulation 18, this definition should be amended to fully align with the LP2021. Further clarity on ancillary waste use is also recommended to avoid unintended misinterpretations of what constitutes a waste site, such as the inclusion of residential waste facilities.

Sites Proposed for Release and Surplus Capacity

Appendix 6 of the draft WLWP includes six existing waste sites proposed for release from safeguarding, with further details provided in the *Assessment of Existing Waste Sites for Release* (July 2026) paper published alongside the draft Plan. These sites are identified in the below table and are the same sites that were put forward for release at Regulation 18. In the Mayor's Regulation 18 response he made it clear that the loss of these sites without providing compensatory capacity would likely raise a general conformity issue.

Borough	Site	Permitted use and permit details	Assessed Peak Waste Capacity (tpa)
Hounslow	Unit 8 Initial Washrooms, Service Centre, TW8 9EZ	Waste transfer	Apportioned waste – 2,156 Hazardous – 1,094
OPDC	Atlas Wharf, Atlas Road, NW10 6DN	None	65,382
	Quattro, Victoria Road	Waste transfer	0
Brent	Mitre Works, Neasden Lane (European Metal Recycling Limited); + X-Bert Haulage sites (2 sites)	Metal recycling Waste transfer	Apportioned waste – 16,490 C&D – 143,976

While it is acknowledged that the draft WLWP assessment of existing waste capacity illustrates a surplus capacity for apportioned waste once the sites identified in the above table have been released, LP2021 Policy SI9 is clear that all waste sites are safeguarded, and that an existing waste site should only be released to other land uses where waste processing capacity is re-provided elsewhere within London, based on the maximum achievable throughput achieved over the last five years. The Mayor is concerned that this approach of releasing sites without reprovision elsewhere within London could impact on achieving some of the key aims of Policies SI8 and SI9, including ensuring net self-sufficiency and optimising the capacity of existing sites.

Regarding the Victoria Road Quattro site, the OPDC Local Plan is clear that the Quattro site ceased operation in November 2018 when the site was first used by HS2 Ltd and its waste use has been relocated by Quattro to other sites elsewhere in West London. It is noted that Quattro no longer has an interest in the site it terms of ownership or operation, and that sites operated by Quattro including the Horn Land site (E07) and Western International Market (HO2) are

safeguarded through the draft WLWP. The Mayor is therefore satisfied that appropriate compensatory capacity of the Quattro site has been secured.

Regarding the remaining sites proposed for release, paragraph 7.8 of the draft WLWP states that the west London LPAs have engaged with London boroughs that have identified unmet needs and intend to continue to do so. Paragraph 3.14 of the Consultation Statement (May 2026), published alongside the draft WLWP, acknowledges that meetings have taken place with Tower Hamlets Council and Westminster City Council to explore requests to share capacity to meet their unmet waste needs. Appendix 1 states that three requests to share capacity were received during the Regulation 18 consultation, however no further details are provided.

Paragraph 9.8.6 of LP2021 is clear that boroughs with a surplus of waste sites should offer to share these sites with those boroughs facing a shortfall in capacity before considering site release. The Mayor is of the view that the five sites proposed to be released from safeguarding should not be considered to be surplus to requirements until it has been confirmed that they are not needed by other boroughs within London to meet their waste needs. There is no information provided alongside the draft WLWP demonstrating that agreement has either been reached regarding the offer and acceptance of surplus capacity, or not.

Agreement should be reached on sharing of surplus capacity before any sites are released. To make the most efficient use of the surplus capacity after London Plan apportionments have been met, the WLWP should therefore make provision to enter into arrangements with other London boroughs regarding sharing of this surplus capacity.

As the waste plan has not sought compensatory waste handling capacity prior to the proposed release of five safeguarded waste sites and the group has not sufficiently demonstrated that surplus waste handling capacity has been offered to other boroughs it is the Mayor's opinion that, as currently drafted, the WLWP is not in general conformity with the LP2021.

Next Steps

I hope these comments positively inform the preparation of the WLWP. The GLA will continue to offer support to work with you to provide guidance and to ensure that the Local Plan aligns with LP2021 as well as delivering the waste group's objectives. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact Hassan Ahmed at [redacted].

Yours sincerely,

[redacted]

Nina Miles

[redacted]

Cc: James Small-Edwards, Chair of London Assembly Planning and Regeneration Committee
Krupesh Hirani, Bassam Mahfouz, Gareth Roberts London Assembly Constituency Members
National Planning Casework Unit, MHCLG

HARROW MONITORING GROUP

advocating inclusion so everyone can access - and shape - the services they need

https://harrowmonitoringgroup.uk/about/ contact [redacted]

Harrow Monitoring Group Response to the Regulation 19 Proposed Submission West London Waste Plan Consultation

Submitted by
Husain Akhtar
Coordinator
Harrow Monitoring Group

24 August 2026

Introduction: who we are and why we are responding

Harrow Monitoring Group (HMG) is an independent community organisation concerned with public services, inclusion, transparency, accountability, value for money and the quality of local decision-making in the London Borough of Harrow. Our work is informed by engagement with residents and by examination of council policies, reports, consultations and governance arrangements.

We are responding to the Proposed Submission West London Waste Plan (WLWP) because this is not simply a technical waste-management document. Once adopted, it will form part of the statutory planning framework and influence decisions about waste-related development across West London until 2041. In Harrow, it proposes the continued safeguarding of two waste sites, at Forward Drive and 151 Pinner View. The consequences of such decisions can be highly local even though the planning strategy is sub-regional.

HMG supports the principle that West London requires a coherent, environmentally sustainable and properly planned approach to waste. Waste must be reduced, reused, recycled and, where necessary, managed through appropriately located facilities. Our concern is therefore not with the existence of a waste plan but with whether this particular Plan adequately demonstrates that its strategic objectives will be achieved fairly, transparently and without imposing disproportionate environmental burdens on particular communities.

Our response is also informed by our earlier examination of Harrow Council's governance of the WLWP. We noted that Harrow Full Council approved Regulation 19 consultation on 2 July

2026 while also delegating authority to officers to consider representations, modify the documents and proceed to submission unless officers determine that consultation produces significant changes to the overall approach. By comparison, Brent retained a final Full Council decision after consultation. We argued that legality and democratic accountability are different tests and that residents should be able to see how their representations have influenced the final document before it is submitted.

Quality and accessibility of the consultation

We welcome the fact that the consultation is available online and that documents can also be inspected at Harrow libraries and the Council Hub. Harrow Council's own consultation information confirms these alternative arrangements.

However, there is a fundamental tension between inviting views from “local communities” and presenting those communities with a consultation whose effective entry point is the specialist language of planning law: legal compliance, general conformity and soundness.

Regulation 19 necessarily operates within a statutory planning framework. We recognise that. But statutory complexity does not remove the responsibility of public authorities to make participation intelligible to ordinary residents.

The volume of supporting material illustrates the problem. Residents are confronted with the Proposed Submission Plan, an Integrated Impact Assessment, Habitats Regulations Assessment, flood-risk assessments, waste-flow and capacity studies, hazardous-waste and construction-waste papers, circular-economy, waste-management and climate-change papers, a consultation statement, protocol, guidance notes and other supporting documents. Much of this evidence is technically necessary. It does not follow that presenting it constitutes meaningful community engagement.

A resident living close to a safeguarded waste site is unlikely to begin with the question: “Is this Plan positively prepared, justified, effective and consistent with national policy?” The questions more likely to matter to that resident are: Will there be more heavy lorries? Which roads will they use? What will happen to air quality? Will there be more noise, dust or odour? What are the risks to children, older people and people already experiencing poor health? Could the site expand? What safeguards will apply if it does? How will impacts from different developments be considered together? And why is this activity located here rather than somewhere else?

The consultation architecture does not foreground those questions sufficiently.

This is particularly important in a diverse borough such as Harrow. Accessibility is not achieved merely because documents can be downloaded or inspected in a library. Genuine accessibility requires plain-English explanations, proportionate summaries, understandable

maps and site-specific information that enables residents to see what a strategic planning decision could mean for their neighbourhood.

The very limited engagement at the earlier stage reinforces this concern. Harrow's Overview and Scrutiny Committee was told that only 77 responses had been received across all participating authorities and that there had been no Harrow-specific comments. Such limited engagement should have prompted a searching examination of whether the consultation methodology was actually reaching affected communities. Absence of representations cannot safely be equated with absence of concern.

What the consultation asks – and what it does not ask

The formal response form asks respondents to identify which part of the Plan their representation concerns, whether they consider the Plan legally compliant and sound, why it is not legally compliant or sound, what modifications are necessary and whether they wish to participate in examination hearings.

Those questions satisfy the procedural requirements of a Regulation 19 consultation, but they are designed principally around the needs of the plan-making and examination process rather than around the way residents experience environmental impacts.

There is no equally prominent invitation to identify whether a safeguarded site creates or reinforces environmental inequality; whether surrounding communities already experience disproportionate environmental pressures; whether HGV movements are likely to affect residential roads; whether vulnerable groups could be disproportionately affected; or whether cumulative effects from waste activity, traffic, housing growth and other development have been adequately assessed.

Nor does the consultation directly ask whether the authorities have succeeded in engaging residents living closest to safeguarded sites. That is an important omission. Consultation quality should not simply be measured by whether an opportunity to respond technically existed. It should consider who actually knew about the consultation, who understood its relevance to them, who participated and which communities remained effectively absent.

The Harrow dimension: environmental justice and cumulative impact

Harrow illustrates why these issues matter.

The Plan identifies two safeguarded Harrow sites: Forward Drive CA Site, operated by Harrow Council, and 151 Pinner View, operated by Harrow Breakers. Published planning material identifies Forward Drive as a waste transfer/civic amenity operation with assessed capacity of

30,757 tonnes per annum, while the Pinner View metal-recycling site has an assessed capacity of 2,247 tonnes per annum and handles hazardous waste.

Harrow is not socially uniform. The Council's own deprivation evidence shows substantial geographical inequalities within the borough. Wealdstone has historically ranked as Harrow's most deprived ward, with Roxbourne , Greenhill and Marlborough also among the most deprived areas. This contrasts markedly with some of the borough's more affluent areas.

This makes environmental justice an essential planning consideration. Waste infrastructure is necessary, but necessary infrastructure should not result in communities already experiencing disadvantage carrying a disproportionate share of environmental burdens.

Heavy vehicle movements are particularly important. Waste facilities do not exist in isolation from the transport network. Their operation can generate HGV and other vehicle movements, with potential consequences for congestion, road safety, noise, emissions and the quality of the pedestrian environment. These effects can extend well beyond the red line of a safeguarded site.

For residents, therefore, the relevant environmental geography is not merely the waste site itself. It includes the roads connecting the facility to the strategic road network and the homes, schools, shops, parks, community facilities and pedestrians along those routes.

The Pinner View site raises a different but equally important issue. Pinner View also provides access to Headstone Manor Park and the historic Headstone Manor complex. Harrow Council describes the park as extending over 50 acres and records significant heritage assets there, including a scheduled monument and four historic listed buildings. The relationship between safeguarded industrial or waste uses and nearby residential, recreational, environmental and heritage assets therefore deserves explicit site-level consideration.

There is also a climate-resilience dimension. The WLWP flood evidence records areas of low, medium and high surface-water flood risk at both Harrow sites. For Forward Drive, such areas occur throughout the site; at 151 Pinner View they are predominantly in the eastern section. The assessment recommends directing future expansion away from high-risk areas and appropriate mitigation.

These are precisely the kinds of interconnected issues that make cumulative assessment important. Flood risk, HGV traffic, air pollution, noise, site expansion, climate change, deprivation and proximity to sensitive receptors should not be considered as unrelated technical boxes.

Question 4: To which parts of the Proposed Submission West London Waste Plan does our response relate?

Our representation relates to the Plan as a whole insofar as it addresses consultation, equality, environmental protection, site safeguarding, implementation and monitoring. More specifically, it relates to the strategic objectives and to Policy WLWP1 on safeguarding waste sites, Policy WLWP2 on additional waste-management capacity, Policy WLWP4 on high-quality and resilient waste facilities, Policy WLWP6 on the circular economy and resource efficiency, the schedule of safeguarded sites, the Integrated Impact Assessment and the monitoring and implementation framework.

It particularly concerns the application of those provisions to HA01 Forward Drive CA Site and HA02 151 Pinner View in Harrow.

Question 5: Do we consider the West London Waste Plan legally compliant and sound?

HMG does not seek to assert, without the benefit of the full evidence available to the planning authorities and ultimately the examining Inspector, that the entire WLWP is legally non-compliant.

Our principal representation is that aspects of the Plan require strengthening before it can convincingly demonstrate soundness, particularly in relation to effectiveness and justification.

We therefore raise an objection on soundness and seek modifications.

Our concern is not that waste facilities should never be safeguarded in Harrow. It is that a Plan extending to 2041 should demonstrate more clearly how environmental justice, cumulative impact, community accessibility, HGV impacts and the circumstances of communities surrounding safeguarded sites have influenced both its strategy and its implementation safeguards.

Question 6: Why do we consider aspects of the Plan unsound?

A sound plan must be more than technically comprehensive. It must provide a sufficiently clear and effective framework for decisions that will follow from it.

First, the Plan does not give sufficient prominence to environmental justice. The Integrated Impact Assessment is valuable, but equality and environmental disadvantage should be operational considerations within the planning policies themselves. A strategic plan should be

capable of asking not merely whether an individual waste development produces an acceptable impact in isolation, but whether its location or expansion adds materially to burdens already borne by disadvantaged communities.

Second, the treatment of transport impacts should be strengthened. Waste facilities can generate substantial HGV movements. A site may be operationally suitable while the routes serving it impose adverse consequences elsewhere. The Plan should therefore require assessment of realistic HGV numbers, routing, times of operation, road safety, air quality and noise, including cumulative impacts where other development is expected.

Third, greater attention should be given to sensitive receptors. Schools, nurseries, homes, care facilities, parks, walking and cycling routes and other community facilities should be explicitly considered when assessing new or intensified waste uses.

Fourth, the Plan needs a stronger approach to cumulative impact. Planning assessments too often examine individual proposals separately. The relevant question for a resident is the total environmental burden experienced where they live. Waste development should therefore be assessed alongside existing waste operations, background traffic, planned housing and commercial development, air-quality conditions and other significant sources of noise or emissions.

Fifth, the Plan's monitoring framework should address community outcomes as well as waste capacity. Monitoring tonnes of waste, available capacity and safeguarded land does not establish whether the strategy is working acceptably for communities. Indicators should also address transport movements, complaints, environmental incidents, air-quality effects where measurable, and the distribution of waste infrastructure in relation to deprivation.

Finally, the experience of the Regulation 18 consultation raises questions about effective engagement. A consultation across seven planning authorities that generated only 77 responses, with no Harrow-specific comments reported to Harrow's scrutiny committee, should trigger analysis of why participation was so limited. An effective Plan requires continuing community engagement, particularly around safeguarded sites.

Question 7: Modifications we consider necessary

HMG asks the authorities to modify the Plan so that environmental justice becomes an explicit consideration in waste-planning decisions. The Plan should require decision-makers to consider whether a proposal would create or intensify a disproportionate environmental burden on communities experiencing socioeconomic disadvantage or existing environmental stress.

Policy WLWP4, or equivalent supporting text, should expressly require transport assessments for new, expanded or materially intensified waste facilities to consider HGV numbers, routes, operating hours, road safety, congestion, noise, emissions and impacts on pedestrians and

cyclists. Assessment should extend beyond the application boundary to the routes realistically used by waste vehicles.

The Plan should expressly require cumulative impact assessment where waste development may interact with other significant existing or planned development or environmental pressures.

The supporting text should require particular consideration of sensitive receptors, including residential areas, schools and early-years provision, health and care facilities, parks and community facilities.

For safeguarded sites, including HA01 and HA02, the Plan should provide clearer site-specific information about environmental constraints, access routes and circumstances in which expansion or intensification might be acceptable. Safeguarding should not be interpreted as an assumption that intensification is acceptable irrespective of its local consequences.

The monitoring framework should be expanded to include indicators capable of identifying adverse community and environmental outcomes, including complaints and significant environmental or transport effects associated with waste facilities.

We also recommend a commitment that communities around safeguarded sites will be proactively engaged when material expansion or intensification is proposed, using accessible information rather than relying solely on conventional statutory notices.

These changes would make the Plan more effective because they would translate broad commitments to sustainable waste management and high-quality facilities into clearer requirements capable of being applied consistently in future planning decisions.

Question 8: Do we consider it necessary to participate in examination hearing sessions?

Yes.

HMG would wish to retain the opportunity to participate in relevant examination hearings, particularly if the Inspector considers matters relating to environmental justice, consultation effectiveness, safeguarded sites, transport and HGV impacts, cumulative environmental effects, equality, monitoring or the Harrow sites.

Question 9: Why do we consider participation in the hearing sessions necessary?

Our concerns extend beyond the wording of an individual policy. They concern the relationship between strategic waste planning, local environmental impacts, socioeconomic disadvantage and democratic accountability.

Harrow provides a useful case study because two sites are proposed for continued safeguarding while the borough contains pronounced differences in deprivation and environmental circumstances. We believe community evidence can assist the Inspector in testing whether the Plan's strategic approach translates into adequate safeguards at neighbourhood level.

Participation would also allow examination of whether the Plan has sufficiently considered the practical accessibility and effectiveness of community engagement. The extremely limited response at Regulation 18, including the reported absence of Harrow-specific representations, makes this a legitimate matter for examination rather than simply an administrative observation.

Governance after the consultation

Although this issue extends beyond the narrow wording of the WLWP, HMG considers the post-consultation decision-making process relevant to public confidence.

Harrow Full Council has already authorised officers to consider Regulation 19 representations, make modifications and proceed to submission unless officers determine that the consultation has produced significant changes to the overall approach. The resolution does not establish an objective public definition of “significant” for that purpose. HMG has previously contrasted this with Brent's decision to retain a final political checkpoint after consultation.

We therefore ask that, irrespective of the delegated authority already granted, Harrow Council publishes the Harrow-related Regulation 19 representations, explains what changes have been made or rejected and why, and places the final submission version before elected members in public.

Consultation should form part of a visible chain of democratic accountability: residents are informed, residents are able to participate, their representations are considered, the response to those representations is transparent, and elected representatives take responsibility for the resulting decision.

Conclusion

HMG supports the preparation of an up-to-date West London Waste Plan and recognises the environmental importance of reducing waste, increasing reuse and recycling, promoting the circular economy and ensuring sufficient waste-management capacity.

But sustainable waste planning is also about people and places.

Communities should not be expected to accept environmental burdens simply because a facility is strategically necessary. Where waste sites are safeguarded close to residential communities, particularly communities experiencing socioeconomic disadvantage or other environmental pressures, the planning framework should demonstrate that distributional impacts, HGV movements, air quality, noise, road safety, flood risk and cumulative effects have been properly considered.

The central test should therefore not simply be whether West London has enough waste-management capacity to 2041. It should also be whether that capacity is planned and managed in a way that is environmentally sustainable, socially equitable, locally accountable and capable of retaining public confidence.

For those reasons, HMG considers that the Proposed Submission WLWP should be modified before adoption to strengthen environmental justice, cumulative-impact assessment, transport safeguards, site-specific transparency, monitoring and community engagement.

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Planning and Infrastructure
West London Alliance
Ealing Council
5th Floor, Perceval House
14-16 Uxbridge Road
Ealing,
W5 2HL

By email to WLWastePlan@ealing.gov.uk

24th September 2026

Dear West London Alliance,

Re: Regulation 19 Proposed Submission West London Waste Plan Consultation August 2026

Heathrow Airport Limited (HAL) welcomes the opportunity to provide comments on the Regulation 19 Proposed Submission West London Waste Plan consultation ("Proposed WLWP"). This follows HAL's response to the Regulation 18 Draft WLWP in January 2026 (see **Appendix 1**) and how our previous comments have been considered.

Our representations on the previous stage of the Draft WLWP explained:

- The need for the WLWP to consider the impact from Heathrow expansion on waste demand;
- Where safeguarded waste sites will be impacted by Heathrow expansion and subject to Emerging Local Plan Site Allocations;
- Support for the flexibility in Policy WLWP1 to allow removal of safeguarded sites where sufficient capacity remains in the plan area; and
- Clarity if the Extended Producer Responsibility EPR reform had been taken into account.

HAL are bringing forward the Heathrow expansion project for the Northwest Runway Scheme. The Heathrow Northwest Runway scheme is supported by current national planning policy as set out in the Airports National Policy Statement (ANPS) (2018) to meet the need for more airport capacity in the south-east of England. The Government has recently reviewed the ANPS and published a consultation on the draft Heathrow National Policy Statement (HENPS) in June 2026. The draft HENPS reaffirms the Government's support for the Northwest Runway scheme and designates the project as Critical National Growth Infrastructure (CNGI) and its delivery is strongly supported by the Government (paragraph 2.39).

Therefore, the ANPS and replacement HENPS, once designated, are the primary planning policy for airports in the south-east of England and this status should be reflected in Development Plan policies, including the WLWP Policies.

HAL submitted an EIA Scoping Report for the Heathrow expansion project to the Secretary of State (SoS) in May 2018[1], with an EIA Scoping Report Addendum submitted to the SoS in September 2025. The latest draft Development Consent Order (DCO) boundary for Heathrow expansion from the EIA Scoping Report Addendum Figure 2.1 is provided as **Appendix 2.**

[1] https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/TR020003

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Representations
Our comments on relevant changes, text and policies are set out below.

This development plan document follows the legacy local plan preparation process set out in the 2024 National Planning Policy Statement (NPPF) and the soundness tests in paragraph 36. These being that development plan policies are positively prepared, justified, effective and consistent with national policy (including the ANPS). Paragraph 5 of the NPPF confirms that National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans.

Therefore, the following amendments will be required in order for the policies to be sound.

Reference	Detail	Comment
Chapter 3, paragraph 3.3 Third sentence	*"expansion of Heathrow Airport will place pressure on certain existing waste sites."*	HAL considers this needs to be clearer and state that the pressure on waste capacity will arise from the need for land take of existing waste sites for works forming part of Heathrow expansion. As such, the text should be revised to the following (additions underlined): *"It is also acknowledged, the prospect of the expansion of Heathrow Airport will place pressure on certain existing waste sites <u>through necessary land take.</u>"*
Policy WLWP 1	Removal of Part G from Regulation 18 Draft Policy WLWP 1 below: "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."	HAL had supported the inclusion of the previous wording for Part G, which allows for safeguarded sites to be released for non-waste uses. WLWP Table 2 shows there is surplus capacity of apportioned household, commercial and industrial (HIC) waste equating to 0.5 Mtpa (24%) over the baseline and 0.35 Mtpa (16%) over the 2041 Forecast demand. Similarly, for construction demolition and excavation waste (CDEW), paragraph 7.3 confirms that with safeguarded sites there will be a surplus of 0.37 Mtpa (17%) by 2041 against forecasts. Therefore, the removal of this Part means the policy does not include any mechanism outside of the review of the Waste Plan to allow for the release of sites, unless replacement capacity is provided, even where there is surplus capacity. This approach is not justified given the existing surplus. This is inconsistent with the National Planning Policy for Waste (NPPW) (2014)

		paragraph 3, where its considers that waste planning authorities should prepare Local Plans which identify sufficient opportunities to meet the identified needs, including considering the extent to which the capacity of existing operational facilities would satisfy any identified need. NPPW paragraph 8 also considers that when determining applications for non-waste development, local planning authorities should ensure that the impact of the proposed development on existing waste management facilities and sites allocated for waste management is acceptable, does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities. As such, the proposed policy is unsound on the basis it is not justified as existing facilities more than satisfy identified need as required by NPPW paragraph 3; not effective as the surplus capacity would mean that applications for non-waste uses should be approved in accordance with NPPW paragraph 8; and not consistent with national policy (NPPW). Therefore, to make the policy sound with NPPF 2024 paragraph 36, the previous Part G wording must be included to allow a mechanism for safeguarded sites to be released without a requirement for provision of replacement capacity, which is not necessary as there a surplus is already demonstrated across waste types.
Site HI06	Land off Holloway Lane Harmondsworth Site Capacity of 27,209 (tpa) for CDEW waste types	The Heathrow expansion EIA Scoping Report Addendum Figure 2.1 provided as **Appendix 2** demonstrates that these sites will fall within the Heathrow expansion DCO limits and will form part of the CNGI , which is strongly supported by the Government in national policy. Therefore, there is a greater need for the sites to support the delivery of CNGI over future waste use and must be released from the safeguarded sites list. Furthermore, the capacity assessment in paragraph 7.3 for CDEW demonstrates a
Site HI09	Holloway Lane Materials Recycling Facility 63,758 (tpa) for HIC/CDEW waste types	

		surplus of 0.37 Mtpa over the 2041 forecast capacity. Meaning if both sites were released as a worst case there would be 0.28 Mtpa residual CDEW capacity by 2041. Similarly, the loss of Site HI09 would result is residual HIC waste capacities of 0.44 Mtp against the baseline and 0.29 Mtp against the 2041 forecast capacity as a worst case. This demonstrates there is sufficient residual capacity for their waste types if these sites are released meaning their loss would not prejudice the wider Waste Plan. As a result, the inclusion of the sites in the plan is unsound by way of their need not being justified for capacity; not effective as the surpluses mean that applications for non-waste uses should be approved in accordance with NPPW paragraph 8 and would not outweigh the need for the Heathrow expansion CNGI; and also not consistent with national policy (HENPS and NPPW). Therefore, for the plan to become sound these sites must be removed from the safeguarded list.

HAL notes the response in the Consultation Statement to our previous comments on incorporating EPR and acknowledge this is expected to be factored into the New London Plan preparation.

Summary

Overall, HAL welcomes the acknowledgement of the added pressure Heathrow expansion will have on some waste sites. However, in order for the policies to be sound, much greater clarity is needed to take into account pressure on site availability from Heathrow expansion.

HAL considers that the removal of Regulation 18 Draft Policy WLWP 1 Part G makes the policy unsound, as there would be no mechanism to allow safeguarded sites to be released without replacement provision, even when the Proposed WLWP demonstrates there will be surplus capacity against forecasts. This text must be included to make the plan sound by allowing applications to demonstrate acceptable impacts on waste capacity.

Furthermore, there is a conflict with the draft DCO limits for Heathrow expansion for safeguarded sites HI06 and HI09 where these sites will be necessary to support the CNGI works. Their inclusion is unsound given there is sufficient residual capacity from other existing sites as required by NPPW paragraph 3; their inclusion is not justified or effective as there is a greater need for the Heathrow expansion CNGI; and it not consistent with national policy in the NPPW. Consequently, these sites should be removed for the WLWP to become sound in accordance with paragraph 36 of the NPPF 2024.

HAL will continue to engage constructively through the Heathrow expansion process and provide available information to help support the preparation of the new WLWP.

Yours faithfully,

[redacted]

Emily Fitzpatrick MRTPI

[redacted]

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Appendix 1 – HAL Representations on Regulation 18 Draft WLWP in January 2026

Classification: Public

Heathrow

Planning and Infrastructure
West London Alliance
Ealing Council
5th Floor, Perceval House
14 – 16 Uxbridge Road
Ealing
W5 2HL

By email: WLWastePlan@ealing.gov.uk. 30th January 2026

Dear West London Alliance,

Re: Consultation on the Draft Updated West London Waste Plan

Heathrow Airport (HAL) was consulted on the Draft Updated West London Waste Plan (DWLWP) on the 11th December 2025 in its capacity as a Statutory Consultee for aerodrome safeguarding. HAL has responded to this consultation request separately in that capacity. This written representation is submitted by the HAL Town Planning team and addresses wider considerations for HAL. The proposal falls within the Draft Order Limit boundary to expand the airport with a third runway to the north west of the airport. The Draft Order Limit was subject to a scoping opinion by the Planning Inspectorate dated 10 October 2025.

Expansion Proposals

During early 2025, the Chancellor of the Exchequer set out the Government's latest reforms to support economic growth. This included an announcement that the Government supports, and is inviting proposals for, a third runway at Heathrow. This support was reflected in a Written Ministerial Statement made by the Secretary of State for Transport on transport and growth. HAL submitted a proposal during the course of the summer namely 'Our Proposal for Expanding Heathrow – The UK's Gateway to Growth'. The Secretary of State for Transport announced in October 2025, a review of the Airport National Policy Statement (ANPS), the core policy document to assess an application for Development Consent against. In November, a statement of approach was issued confirming the preferred scheme that would be taken forwards to inform the ongoing ANPS review was our scheme namely Expansion of Heathrow Airport promoted by HAL.

HAL is preparing its application for Development Consent Order for the new runway and associated infrastructure and facilities, with a view to securing planning permission and compulsory purchase rights by 2029.

Response Form Questions (note the numbering is different to the form)

1. Do you agree or disagree with the overall direction and scope of the Plan's Vision?

HAL support many of the overall principles in the plan, e.g. self-sufficiency and its vision e.g. the minimisation of residual waste, low-carbon processes and controlled movement of materials.

However, it is imperative that the plan's strategy and scope do not conflict/complement the delivery of the nationally significant Heathrow Expansion Project which is clearly supported by the ANPS in policy terms.

Several of the proposed safeguarded waste sites as per Appendix 2 – List of Safeguarded Sites fall within or adjacent to the draft order limit for our Development Consent Order (DCO) application. Those sites that fall within the draft order limit namely HI 06 - Land off Holloway Lane, Harmondsworth and HI 09 - Holloway Lane Materials Recycling Facility are subject to being displaced. This would conflict with *'focus*

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on the efficient and flexible use of safeguarded sites' and *'network of management facilities across West London will continue to ensure an equivalent amount of waste produced within west London is managed, contributing to net self-sufficiency, furthermore flexibility to manage waste from outside the area'*.

The ability of these sites to contribute to future waste needs must be reviewed in consultation with HAL. As well as direct impacts, the Heathrow Expansion Project will create its own waste demands during construction and operation. HAL will be undertaking modelling as it prepares its application. The Draft West London Waste Plan must be informed by this work.

2. Do you agree or disagree with the overall direction and scope of the Plan's Strategic Objectives?

Our proposals to expand the airport raise some concerns across all five objective; key issues being, expansion will increase waste arisings, removes and impacts safeguarded waste sites, use of regional waste capacity, integration with circular economy networks and low-carbon transport for waste.

Our proposals aspire to demonstrate strong alignment with the circular economy principles, waste minimisation and environmental protection. However, given the presence of safeguarded waste sites within the draft Order Limits and the WLWP's capacity requirements, ongoing coordinated engagement with West London authorities is essential to ensure the preparation of our DCO aligns with the Plan's objectives.

3. Do you agree or disagree with Policy WLWP 1 Safeguarding and Optimising the Waste Site Network and its intention?

We recognise this policy is more flexible than the current policy and allows for removal of sites where there remains sufficient capacity elsewhere in the waste plan area, rather than only through compensatory replacement in the 2015 West London Waste Plan. However, it needs to be compatible with the Third Runway Project. Table 1 below sets out the provision of sites that interact with our draft order limit as they are located either within this limit or adjacent to, or allocated for a particular land use of interest to our scheme (see Site Ref: HO3).

Table 1: Safeguarded Sites relevant to HEP DCO (as per Appendix 2)		
Site Ref	List of safeguarded sites as per Appendix 2 subject to impact by Heathrow Expansion Proposals.	What is the impact?
HI 02	Airside Waste Sweepings Treatment Facility	Operated by Heathrow and located within Fire Service compound to the east of the runway, this site will be unaffected by expansion.
HI 06	Land off Holloway Lane, Harmondsworth	Located within the draft Order Limit, proposed re-provision of public open space.
HI 09	Holloway Lane Materials Recycling Facility	Located within the draft Order Limit, proposed re-provision of public open space.
HI 16	Unit 1, Wallingford Road Recycling Facility	Adjacent to the draft Order Limit, the site will be unaffected by expansion.

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HI 20	Cranford Lane WTS, Heathrow	Located in the Terminal 2 & 3 Long Stay Parking area and operated by Heathrow Airport Limited (HAL). The site will be unaffected by expansion.
HO3	St Albans Farm Recycling Facility (also known as Ron Smith (Recycling) Limited)	Site is outside the draft Order Limit, however under the 2019 Statutory Consultation material namely Airport Expansion Consultation document, this site was proposed as delivery for freight forwarding. The site is subject to an industrial site allocation in the Regulation 22 Hounslow Local Plan. HAL is currently reviewing its existing and future baseline for delivering both displaced and projected growth in airport related development, which includes freight forwarding use.

4. Do you agree or disagree with Policy WLWP 2 Provision of Additional Waste Management Capacity and its intention?

WLWP 2 sets out those instances where additional waste management capacity would be supported. HAL supports this policy given our proposal to expand the airport and likely generation of significant quantities of waste at both the construction and operational phases of building and delivering the scheme.

5. Do you agree or disagree with Policy WLWP 3 Residual Waste Management and Energy Recovery and its intention?

HAL have no comments to make regarding this policy.

6. Do you agree or disagree with Policy WLWP 4 Ensuring High Quality and Resilient Waste Facilities and its intention?

HAL have no comments to make regarding this policy.

7. Do you agree or disagree with Policy WLWP 5 Recovery and Disposal of Waste to Land and its intention?

WLWP 5 sets out support for the deposit of inert waste to land where it would be deposited for beneficial purposes and that it was with the material that could not be practically reused or recycled. Given that our proposals have the potential to generate significant quantities of excavation waste that could be readily used on site for landscape/ noise attenuation purposes we support this policy.

8. Do you agree or disagree with Policy WLWP 6 Circular Economy & Resource Efficiency and its intention?

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HAL have no comments to make regarding this policy.

Detailed Response

It is noted under Section 7 of the DWLWP it has identified that there is sufficient capacity in West London to meet the management requirements for all three principal waste streams throughout the draft Plan period, that:

- No new allocations for the development of additional waste facilities have been identified; and
- Existing waste management sites will be safeguarded, where such safeguarding does not hinder the wider development aims of the host Local Planning Authorities.

The need assessment underpinning the DWLWP and the DWLWP itself should, as a minimum, contain recognition of potential and planning major infrastructure particularly Heathrow in respect of:

- The consequential additional burden that the construction and operation of major infrastructure projects will place upon the local waste management infrastructure capacity for all waste streams; and
- The potential loss of existing waste management infrastructure.

The DWLWP should reference and consider the Airport National Policy Statement (ANPS) (2018) as an adopted policy document and consider our Draft Order Limit Boundary (Figure 3.1) of EIA Scoping Report Figures, Expanding Heathrow dated 1 September 2025 submitted to the Planning Inspectorate, (this can be found on the Planning Inspectorate National Infrastructure Project webpage) as part of its baseline, including the loss of two sites. Should a GIS data file be required, we can provide this.

HAL would welcome the opportunity to engage to consider the availability of sites HI 06 & HI 09, given our proposals seek to displace both these sites in order to deliver our Development Consent Order (DCO). As referenced in Table 1 above, and likely known, site HO3 is subject to an industrial site allocation in the Regulation 22 Hounslow Local Plan and should be removed in line with the sufficiently advanced Local Plan. With regards to Draft Policy 1, engagement will be required to discuss and agree an approach to the loss of these two sites and whether alternative provision will be required, in the event the Waste Authorities do not have adequate provision and the loss of a safeguarded site is to the detriment of the Authorities projected capacity. Furthermore, an opportunity to engage on the need for Waste Authorities to look for alternative sites in light of our proposals to expand.

Permits, Licenses and Consents

It is unclear whether the Draft West London Waste Plan takes into account the Department of Environment, Food and Rural Affairs (DEFRA) Extended Producer Responsibility (EPR) reform. This would come into play with regards to identified safeguarded sites, and those subject to displacement by expansion, given any lost sites would need to be justified with regards to recycling/ recovery targets under EPR, to ensure capacity for this waste stream is not undermined by our proposals. Safeguarded sites may serve different functions under EPR, as waste streams change in volume and composition, the suitability of individual safeguarded sites may need to be revisited.

Concluding remarks

The DWLWP must incorporate DEFRA's EPR Reform into the WLWP's needs assessments and policy narrative, acknowledging its likely impacts on local waste flows and infrastructure requirements through to 2041.

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It is essential to work collaboratively with HAL to discuss the implications of the displacement of safeguarded sites (HI06 & HI09) and determine whether replacement capacity, alternative provision or compensatory measures are required.

It is essential that the WLWP aligns safeguarded capacity with future waste profiles shaped by EPR, so that West London continues to meet national and London-wide targets.

Finally, the plan should be informed by data sharing with HAL to ensure that operational and construction waste forecasts used in plan-making reflect both EPR compliance and the scale of Heathrow's proposal to expand the airport.

We will continue to monitor the progress of the DWLP during the local planning period (up to late 2027).

Yours sincerely,

[redacted]

Emily Fitzpatrick MRTPI

[redacted]

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Appendix 2 – EIA Scoping Addendum (September 2025) Draft DCO Limits Boundary Extract

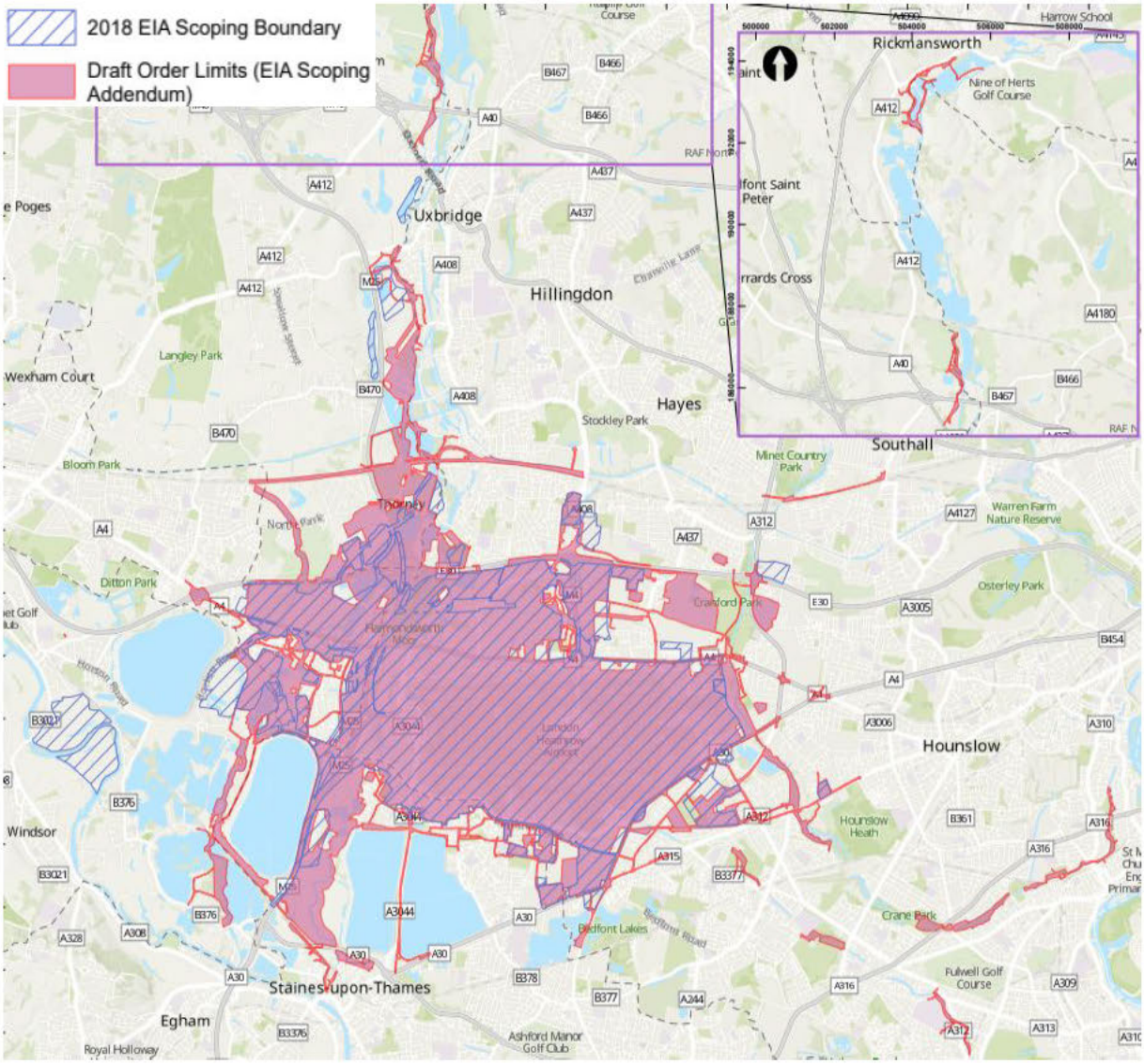


Figure 0-1 – Figure 2.1: Comparison of the 2018 EIA Scoping Boundary with the Draft Order Limits (EIA Scoping Addendum) Extract from the EIA Scoping Report Figures (September 2025)

28 September 2026

Planning and Infrastructure
West London Alliance
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W5 2HL

Via email only: WLWastePlan@ealing.gov.uk

Dear Sir/Madam,

Regulation 19 Proposed Submission West London Waste Plan Consultation Response

Representations on behalf of Heathrow West Limited

Introduction

On behalf of Heathrow West Limited ('**HWL**'), we write to provide representations in respect of the Regulation 19 Proposed Submission West London Waste Plan (May 2026) ('**the draft Plan**') in the context of HWL's expansion proposals at Heathrow Airport.

These representations address two related matters. First, the designated Airports National Policy Statement ('ANPS') (and once designated, the Heathrow Expansion National Policy Statement ('HENPS')) will constitute the primary policy document and decision-making framework in relation to any DCO application for the expansion of Heathrow Airport, and this should be appropriately recognised in the draft Plan.

Second, HWL considers that the draft Plan and its evidence base do not yet adequately address the foreseeable waste management implications of Heathrow expansion, particularly in relation to construction, demolition and excavation waste, operational waste, safeguarded waste management capacity and the provision and location of additional waste management infrastructure. HWL therefore seeks proportionate modifications ('Main Modifications') to the draft Plan to ensure that its policy framework can respond appropriately to the particular requirements of Heathrow expansion as these become better defined.

Background of Heathrow West

HWL is a company that forms part of the Arora Group. HWL has been established as the dedicated project company responsible for promoting, developing and, subject to the grant of development consent pursuant to the Planning Act 2008 (as amended), delivering an alternative approach to

Heathrow expansion. HWL is promoting 'Heathrow West' as a competitive, privately-led expansion proposal intended to provide additional airport capacity while improving passenger choice, affordability, operational resilience and service quality. The Arora Group is a UK-owned business with a long-standing presence at and around Heathrow Airport. Founded in 1999, the group owns and manages a portfolio of hotel, hospitality and business assets in key UK locations, including a significant presence at Heathrow.

HWL and the Arora Group has a long history of promoting the expansion of Heathrow Airport. Between 2017 and 2020 HWL promoted a previous scheme in respect of a new Terminal 6 within the western terminal campus of Heathrow that was designed to integrate with a separate promoter's scheme i.e. Heathrow Airport Limited's (HAL) scheme, which included a north west runway. However, HWL's previous project was paused following the Covid-19 pandemic.

In 2025, HWL restarted the design process to include a new runway and HWL responded to an invitation from the Department for Transport ('DfT') for promoters to bring forward Heathrow expansion schemes capable of informing the review of the Airports National Policy Statement ('ANPS'). In April 2026, the Civil Aviation Authority concurred with the Secretary of State ('SoS') for Transport that HWL's 2025 runway work was sufficiently advanced to inform the emerging ANPS review, since renamed the Heathrow Expansion National Policy Statement ('HENPS').

Heathrow West's proposed development will be a Nationally Significant Infrastructure Project ('NSIP') pursuant to the Planning Act 2008 (as amended) and the key components include a 2,400m third runway, new Terminal 6 building, airport infrastructure, surface access improvements, river diversions, green infrastructure and associated works to support the expansion of Heathrow Airport.

HWL is proceeding with stakeholder engagement on its emerging proposals, and HWL is engaging with the Planning Inspectorate, DfT, statutory bodies, relevant local authorities, affected landowners, local communities and other key stakeholders as HWL's proposed development evolves.

HWL's public launch and informal consultation took place between June and July 2026 which communicated the reactivation of HWL's proposed development, and HWL will continue to undertake ongoing engagement, as well as a formal consultation planned from Spring 2027. HWL is targeting the submission of a Development Consent Order ('DCO') application pursuant to the Planning Act 2008 (as amended) in Winter 2027.

Policy Framework

National Policy Statements

National Policy Statements ('NPS') are designated under the Planning Act 2008 (as amended) to provide the primary policy framework for the examination and determination of DCO applications for NSIPs. NPSs set out the Government's objectives for NSIPs, establish the strategic need for development, identify the criteria against which applications should be assessed, and provide the policy basis upon which the relevant SoS determines whether development consent should be granted.

The statutory basis for NPSs is contained within Parts 2 and 3 of the Planning Act 2008. Part 2 requires the relevant SoS to prepare and designate NPSs for nationally significant infrastructure sectors, whilst Part 3 defines those developments that constitute NSIPs. Section 104 of the Planning Act 2008 requires the SoS to determine applications for DCOs in accordance with the relevant

designated NPS, unless one of the limited statutory exceptions applies. Accordingly, the designated NPS forms the principal policy framework against which DCO applications are examined and determined.

The Planning and Infrastructure Act 2025 strengthened this framework by introducing a statutory requirement for designated NPSs to be reviewed at intervals of no more than five years, ensuring that they remain up to date with changes in legislation, national policy and evidence.

Relevant National Policy Statements

For the aviation sector, the current NPS, the ANPS, was designated in 2018 and establishes the Government's policy in support of additional airport capacity through the delivery of a Northwest Runway at Heathrow Airport. It identifies the need for the scheme and provides the policy framework against which the SoS for Transport determines applications for development consent.

In October 2025, the SoS announced a review of the ANPS to reflect changes in legislation, national policy and the evidence base since its designation, and to ensure that any proposed expansion continues to satisfy the Government's four tests on economic growth, climate, air quality and noise.

As part of this review, the ANPS has been renamed the HENPS to reflect the Government's confirmed position that Heathrow remains the preferred location for additional runway capacity in the South East of England. The draft HENPS, published on 18 June 2026, confirms that it is a site-specific NPS that will continue to have effect for the purposes of Section 104 of the Planning Act 2008 in relation to the provision of a Northwest Runway and associated infrastructure at Heathrow Airport.

Once designated, the HENPS will constitute the primary policy document and decision-making framework as it relates to any DCO application for expansion at Heathrow Airport.

In making decisions on DCO applications, Section 104 of the Planning Act 2008 states that the SoS must also have regard to any other matters that they consider to be both *"important and relevant"*. Whilst this is likely to include the West London Waste Plan, the latter is not the principal policy against which a DCO application is determined.

This distinction is important in the context of the West London Waste Plan review and the draft Plan cannot establish or revisit the strategic need for expansion at Heathrow Airport, nor can it alter the national policy basis upon which any future DCO application will be determined. Those matters are established through the current ANPS, the emerging HENPS and the statutory decision-making framework under the Planning Act 2008.

Regulation 19 Proposed Submission West London Waste Plan

We note the draft Plan sets out West London Local Planning Authorities' (LPAs') approach to planning for the management of waste through to 2041 within the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond-upon-Thames.

Having reviewed the draft Plan, we wish to make the following overarching comments:

- As noted above, the ANPS (and once designated, the HENPS) will constitute the primary policy document and decision-making framework as it relates to any DCO application for

expansion at Heathrow Airport. Therefore, this should be explicitly stated and set out in West London's future Waste Plan, including any future draft version(s)/consultation(s).

- We welcome the acknowledgement in paragraph 1.8 of the West London Waste Plan that the potential waste management implications of Heathrow's expansion may trigger a need for early review of the Plan. HWL welcomes these statements and West London LPAs' willingness to develop policy as the details of future expansion of Heathrow Airport materialise, and HWL is willing to collaboratively engage throughout such processes.

- We welcome the protections afforded to the Aerodrome Safeguarding Zone for Heathrow Airport regarding the potential risks from landfilled non-inert waste at paragraph 8.52.

The draft Plan– materials and waste evidence base and soundness

HWL has undertaken an initial review of the waste evidence base supporting the draft Plan. That review identifies two related matters which HWL considers need to be addressed in order to ensure that the draft Plan provides an effective basis for managing the waste implications of Heathrow expansion: first, the potential for significant construction, demolition and excavation (CD&E) waste arisings, including inert, non-hazardous and hazardous/contaminated material; and second, the additional operational waste and associated recycling and recovery infrastructure that may be required as a consequence of an expanded airport.

The Regulation 19 CD&E[1] forecast uses historic arisings as its starting point. Its principal forecast assumes no growth, with an upper-range sensitivity based on the Greater London Authority construction-sector employment projections as a proxy for construction activity. National Planning Practice Guidance expressly identifies any significant planned regeneration or major infrastructure projects over the timescale of the draft Plan as a relevant consideration when forecasting construction and demolition waste arisings. The evidence itself rightly recognises that employment is not necessarily a reliable proxy for waste production, and that forward projections of waste arisings are subject to uncertainty. The more recent London Waste Infrastructure Capacity Study[2] also recognises that general economic projections may not adequately represent the contribution from major infrastructure projects, which can generate very different quantities and types of CD&E waste depending on the nature of the project. The scale and composition of HWL's excavation arisings are likely to be significant and subject to a variety of management methods depending on the nature of the wastes.

There is a related issue in respect of operational waste. We note that HAL (i.e. the separate promoter of Heathrow expansion) has published their Resources and Waste Strategy[3] which identifies passenger activity as the principal driver of operational waste, reflecting associated retail,

[1] Evidence base report titled *"Construction, Demolition & Excavation Waste Arising in West London to 2041. Report: Regulation 19. Version: 2.1: Issued July 2026"*
[2] Draft London Plan 2026 evidence base document: https://data.london.gov.uk/download/2nmd8/wwf/London%20Waste%20Infrastructure%20Capacity%20Study.pdf
[3] HAL's document is titled: "Heathrow Resources and Waste Strategy (December 2025) accessed via: https://www.heathrow.com/content/dam/heathrow/web/common/documents/company/heathrow-2-0-sustainability/strategy/Resources-and-Waste-Strategy.pdf. Please note this relates to a separate Heathrow expansion project.

food and beverage activity and staffing. Operational waste is currently managed through a combination of on-airport collection, segregation and consolidation, but also relies upon off-airport treatment infrastructure as part of this process.

HAL's current strategy is therefore not based on operational waste being managed wholly within the airport boundary. Rather, it depends upon suitable recycling, recovery and treatment infrastructure serving the airport. The strategy also seeks to increase recycling and reduce waste generation, but this does not remove the need for downstream capacity; it changes the nature and balance of the infrastructure required. HAL's 2025 Sustainability Report[4] records that around 49% of operational waste was recycled in 2025, with the remainder sent for energy recovery, and that terminal and aircraft cabin waste together form the majority of operational waste.

This is relevant to Heathrow expansion because increased passenger and airport activity has the potential to increase operational waste generation and associated demand for recycling and recovery infrastructure, notwithstanding measures to reduce waste generation and improve recycling performance. The draft Plan should therefore be capable of responding not only to any additional waste arising from expansion, but also to the particular infrastructure requirements associated with managing that waste in accordance with the waste hierarchy.

HWL is not seeking the allocation of new waste management sites through the draft Plan examination to address issues of soundness. At this stage, it is considered that the criteria-based policy framework should be adapted so as to adequately account through the planning system for the particular waste management requirements of Heathrow expansion as they become better defined. Paragraph 1.8 is helpful in recognising that Heathrow expansion may trigger an early review of the draft Plan, but an early review should not be the only mechanism by which the draft Plan can respond to the potential additional, replacement or differently located waste management capacity that may be required during the Plan period.

HWL therefore considers that Main Modifications should be made to Policies WLWP 1, WLWP 2 and WLWP 5, together with associated supporting text, so that the draft Plan expressly recognises the circumstances arising from Heathrow expansion. Alternatively, a bespoke new policy should be considered to address the waste planning implications of the need to manage waste generated from Heathrow expansion, suitable for use in the event the Plan is still undergoing (or yet to commence) further future review at the time the proposed expansion is being considered through the planning process.

In particular:

Policy WLWP 1 should allow a proportionate and flexible approach where delivery of Heathrow expansion requires the loss, relocation or reconfiguration of safeguarded waste capacity. This should allow the amount, location and timing of any replacement capacity to be determined through a project-specific assessment taking into account broader planning considerations.

[4] HAL's document is titled: "Connecting People and Planet, Heathrow 2.0: Our Sustainability Strategy. Updated Version Published December 2024 (accessed via: https://www.heathrow.com/content/dam/heathrow/web/common/documents/company/heathrow-2-0-sustainability/strategy/connecting-people-and-planet.pdf). Please note this relates to a separate Heathrow expansion project.

Policy WLWP 2 should expressly recognise that additional waste management capacity may be required to facilitate the construction or operation of an expanded Heathrow Airport. The policy should provide a clear route for such capacity to be supported where a project-specific need is demonstrated. It should also allow the normal locational preferences to be applied flexibly where the functional or locational requirements of Heathrow expansion justify an alternative location. This would avoid a situation in which infrastructure needed to manage waste generated by Heathrow expansion is constrained because the baseline need had not been captured in the general waste forecasts on which the Plan is based.

Policy WLWP 5 and its supporting text should similarly make clear that a demonstrated project-specific requirement associated with Heathrow expansion may establish the relevant need for recovery or disposal capacity where material cannot practicably and reasonably be re-used, recycled or otherwise recovered. This would not displace the waste hierarchy or the environmental safeguards in the policy, but would ensure that the need test is not applied by reference only to the general capacity forecasts which do not presently demonstrate that Heathrow expansion has been fully reflected.

Currently, HWL considers that the draft Plan is unsound in these respects because it is not adequately justified or effective, and is not fully consistent with national policy, because the evidence base does not demonstrate that the foreseeable waste implications of Heathrow expansion have been appropriately addressed in baseline waste projections and the policy framework is not yet sufficiently flexible to respond to them. HWL considers that Main Modifications reflecting these issues (including consideration of a new bespoke policy to address waste management issues resulting from Heathrow expansion), alongside a clear monitoring and early-review mechanism, could provide a proportionate means of addressing these matters without requiring additional site allocations at this stage.

Conclusion

To reiterate, the ANPS (and once designated, the HENPS) will constitute the primary policy document and decision-making framework as it relates to any DCO application for expansion at Heathrow Airport, and therefore, this should be explicitly set out in the West London Waste Plan.

HWL also considers that the draft Plan should provide a sufficiently flexible policy framework to respond to the waste management requirements of Heathrow expansion as these become better defined. HWL is not seeking the allocation of additional waste management sites at this stage. Instead, the identified soundness concerns could be addressed proportionately through modifications to Policies WLWP 1, WLWP 2 and WLWP 5 (or alternatively through a policy bespoke to Heathrow expansion), and associated supporting text, to ensure that the loss or reconfiguration of safeguarded capacity, provision of additional or replacement waste management infrastructure, and any project-specific recovery or disposal requirements can be considered appropriately where justified by Heathrow expansion. This should be supported by an effective monitoring and early-review mechanism.

HWL therefore considers that these matters should be addressed through the Examination of the Plan and wishes to retain the opportunity to be invited to participate in relevant hearing sessions.

HWL also reserves its position to provide further technical evidence on these matters as the Heathrow expansion proposals and associated waste management requirements develop, subject to the Inspector's directions.

We welcome engagement with West London LPAs and we would be grateful if you could keep us informed of any further consultations relating to the West London Waste Plan.

Should you have any further queries, please contact Sarah Price at DWD, and copy in her colleagues:

[redacted]

Yours sincerely,

[redacted]

Ries-William Lamont

[redacted]

28 September 2026

Planning and Infrastructure
West London Alliance
Ealing Council 5th Floor
Perceval House
14-16 Uxbridge Road
Ealing
W5 2HL

Via email only: WLWastePlan@ealing.gov.uk

Dear Sir/Madam,

Regulation 19 Proposed Submission West London Waste Plan Consultation Response

Representations on behalf of Heathrow West Limited

Introduction

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These representations address two related matters. First, the designated Airports National Policy Statement ('ANPS') (and once designated, the Heathrow Expansion National Policy Statement ('HENPS')) will constitute the primary policy document and decision-making framework in relation to any DCO application for the expansion of Heathrow Airport, and this should be appropriately recognised in the draft Plan.

Second, HWL considers that the draft Plan and its evidence base do not yet adequately address the foreseeable waste management implications of Heathrow expansion, particularly in relation to construction, demolition and excavation waste, operational waste, safeguarded waste management capacity and the provision and location of additional waste management infrastructure. HWL therefore seeks proportionate modifications ('Main Modifications') to the draft Plan to ensure that its policy framework can respond appropriately to the particular requirements of Heathrow expansion as these become better defined.

Background of Heathrow West

HWL is a company that forms part of the Arora Group. HWL has been established as the dedicated project company responsible for promoting, developing and, subject to the grant of development consent pursuant to the Planning Act 2008 (as amended), delivering an alternative approach to

Heathrow expansion. HWL is promoting 'Heathrow West' as a competitive, privately-led expansion proposal intended to provide additional airport capacity while improving passenger choice, affordability, operational resilience and service quality. The Arora Group is a UK-owned business with a long-standing presence at and around Heathrow Airport. Founded in 1999, the group owns and manages a portfolio of hotel, hospitality and business assets in key UK locations, including a significant presence at Heathrow.

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Heathrow West's proposed development will be a Nationally Significant Infrastructure Project ('NSIP') pursuant to the Planning Act 2008 (as amended) and the key components include a 2,400m third runway, new Terminal 6 building, airport infrastructure, surface access improvements, river diversions, green infrastructure and associated works to support the expansion of Heathrow Airport.

HWL is proceeding with stakeholder engagement on its emerging proposals, and HWL is engaging with the Planning Inspectorate, DfT, statutory bodies, relevant local authorities, affected landowners, local communities and other key stakeholders as HWL's proposed development evolves.

HWL's public launch and informal consultation took place between June and July 2026 which communicated the reactivation of HWL's proposed development, and HWL will continue to undertake ongoing engagement, as well as a formal consultation planned from Spring 2027. HWL is targeting the submission of a Development Consent Order ('DCO') application pursuant to the Planning Act 2008 (as amended) in Winter 2027.

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The statutory basis for NPSs is contained within Parts 2 and 3 of the Planning Act 2008. Part 2 requires the relevant SoS to prepare and designate NPSs for nationally significant infrastructure sectors, whilst Part 3 defines those developments that constitute NSIPs. Section 104 of the Planning Act 2008 requires the SoS to determine applications for DCOs in accordance with the relevant

designated NPS, unless one of the limited statutory exceptions applies. Accordingly, the designated NPS forms the principal policy framework against which DCO applications are examined and determined.

The Planning and Infrastructure Act 2025 strengthened this framework by introducing a statutory requirement for designated NPSs to be reviewed at intervals of no more than five years, ensuring that they remain up to date with changes in legislation, national policy and evidence.

Relevant National Policy Statements

For the aviation sector, the current NPS, the ANPS, was designated in 2018 and establishes the Government's policy in support of additional airport capacity through the delivery of a Northwest Runway at Heathrow Airport. It identifies the need for the scheme and provides the policy framework against which the SoS for Transport determines applications for development consent.

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As part of this review, the ANPS has been renamed the HENPS to reflect the Government's confirmed position that Heathrow remains the preferred location for additional runway capacity in the South East of England. The draft HENPS, published on 18 June 2026, confirms that it is a site-specific NPS that will continue to have effect for the purposes of Section 104 of the Planning Act 2008 in relation to the provision of a Northwest Runway and associated infrastructure at Heathrow Airport.

Once designated, the HENPS will constitute the primary policy document and decision-making framework as it relates to any DCO application for expansion at Heathrow Airport.

In making decisions on DCO applications, Section 104 of the Planning Act 2008 states that the SoS must also have regard to any other matters that they consider to be both *"important and relevant"*. Whilst this is likely to include the West London Waste Plan, the latter is not the principal policy against which a DCO application is determined.

This distinction is important in the context of the West London Waste Plan review and the draft Plan cannot establish or revisit the strategic need for expansion at Heathrow Airport, nor can it alter the national policy basis upon which any future DCO application will be determined. Those matters are established through the current ANPS, the emerging HENPS and the statutory decision-making framework under the Planning Act 2008.

Regulation 19 Proposed Submission West London Waste Plan

We note the draft Plan sets out West London Local Planning Authorities' (LPAs') approach to planning for the management of waste through to 2041 within the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond-upon-Thames.

Having reviewed the draft Plan, we wish to make the following overarching comments:

- As noted above, the ANPS (and once designated, the HENPS) will constitute the primary policy document and decision-making framework as it relates to any DCO application for

expansion at Heathrow Airport. Therefore, this should be explicitly stated and set out in West London's future Waste Plan, including any future draft version(s)/consultation(s).

- We welcome the acknowledgement in paragraph 1.8 of the West London Waste Plan that the potential waste management implications of Heathrow's expansion may trigger a need for early review of the Plan. HWL welcomes these statements and West London LPAs' willingness to develop policy as the details of future expansion of Heathrow Airport materialise, and HWL is willing to collaboratively engage throughout such processes.

- We welcome the protections afforded to the Aerodrome Safeguarding Zone for Heathrow Airport regarding the potential risks from landfilled non-inert waste at paragraph 8.52.

The draft Plan– materials and waste evidence base and soundness

HWL has undertaken an initial review of the waste evidence base supporting the draft Plan. That review identifies two related matters which HWL considers need to be addressed in order to ensure that the draft Plan provides an effective basis for managing the waste implications of Heathrow expansion: first, the potential for significant construction, demolition and excavation (CD&E) waste arisings, including inert, non-hazardous and hazardous/contaminated material; and second, the additional operational waste and associated recycling and recovery infrastructure that may be required as a consequence of an expanded airport.

The Regulation 19 CD&E[1] forecast uses historic arisings as its starting point. Its principal forecast assumes no growth, with an upper-range sensitivity based on the Greater London Authority construction-sector employment projections as a proxy for construction activity. National Planning Practice Guidance expressly identifies any significant planned regeneration or major infrastructure projects over the timescale of the draft Plan as a relevant consideration when forecasting construction and demolition waste arisings. The evidence itself rightly recognises that employment is not necessarily a reliable proxy for waste production, and that forward projections of waste arisings are subject to uncertainty. The more recent London Waste Infrastructure Capacity Study[2] also recognises that general economic projections may not adequately represent the contribution from major infrastructure projects, which can generate very different quantities and types of CD&E waste depending on the nature of the project. The scale and composition of HWL's excavation arisings are likely to be significant and subject to a variety of management methods depending on the nature of the wastes.

There is a related issue in respect of operational waste. We note that HAL (i.e. the separate promoter of Heathrow expansion) has published their Resources and Waste Strategy[3] which identifies passenger activity as the principal driver of operational waste, reflecting associated retail,

[1] Evidence base report titled *"Construction, Demolition & Excavation Waste Arising in West London to 2041. Report: Regulation 19. Version: 2.1: Issued July 2026"*
[2] Draft London Plan 2026 evidence base document: https://data.london.gov.uk/download/2nmd8/wwf/London%20Waste%20Infrastructure%20Capacity%20Study.pdf
[3] HAL's document is titled: "Heathrow Resources and Waste Strategy (December 2025) accessed via: https://www.heathrow.com/content/dam/heathrow/web/common/documents/company/heathrow-2-0-sustainability/strategy/Resources-and-Waste-Strategy.pdf. Please note this relates to a separate Heathrow expansion project.

food and beverage activity and staffing. Operational waste is currently managed through a combination of on-airport collection, segregation and consolidation, but also relies upon off-airport treatment infrastructure as part of this process.

HAL's current strategy is therefore not based on operational waste being managed wholly within the airport boundary. Rather, it depends upon suitable recycling, recovery and treatment infrastructure serving the airport. The strategy also seeks to increase recycling and reduce waste generation, but this does not remove the need for downstream capacity; it changes the nature and balance of the infrastructure required. HAL's 2025 Sustainability Report[4] records that around 49% of operational waste was recycled in 2025, with the remainder sent for energy recovery, and that terminal and aircraft cabin waste together form the majority of operational waste.

This is relevant to Heathrow expansion because increased passenger and airport activity has the potential to increase operational waste generation and associated demand for recycling and recovery infrastructure, notwithstanding measures to reduce waste generation and improve recycling performance. The draft Plan should therefore be capable of responding not only to any additional waste arising from expansion, but also to the particular infrastructure requirements associated with managing that waste in accordance with the waste hierarchy.

HWL is not seeking the allocation of new waste management sites through the draft Plan examination to address issues of soundness. At this stage, it is considered that the criteria-based policy framework should be adapted so as to adequately account through the planning system for the particular waste management requirements of Heathrow expansion as they become better defined. Paragraph 1.8 is helpful in recognising that Heathrow expansion may trigger an early review of the draft Plan, but an early review should not be the only mechanism by which the draft Plan can respond to the potential additional, replacement or differently located waste management capacity that may be required during the Plan period.

HWL therefore considers that Main Modifications should be made to Policies WLWP 1, WLWP 2 and WLWP 5, together with associated supporting text, so that the draft Plan expressly recognises the circumstances arising from Heathrow expansion. Alternatively, a bespoke new policy should be considered to address the waste planning implications of the need to manage waste generated from Heathrow expansion, suitable for use in the event the Plan is still undergoing (or yet to commence) further future review at the time the proposed expansion is being considered through the planning process.

In particular:

Policy WLWP 1 should allow a proportionate and flexible approach where delivery of Heathrow expansion requires the loss, relocation or reconfiguration of safeguarded waste capacity. This should allow the amount, location and timing of any replacement capacity to be determined through a project-specific assessment taking into account broader planning considerations.

[4] HAL's document is titled: "Connecting People and Planet, Heathrow 2.0: Our Sustainability Strategy. Updated Version Published December 2024 (accessed via: https://www.heathrow.com/content/dam/heathrow/web/common/documents/company/heathrow-2-0-sustainability/strategy/connecting-people-and-planet.pdf). Please note this relates to a separate Heathrow expansion project.

Policy WLWP 2 should expressly recognise that additional waste management capacity may be required to facilitate the construction or operation of an expanded Heathrow Airport. The policy should provide a clear route for such capacity to be supported where a project-specific need is demonstrated. It should also allow the normal locational preferences to be applied flexibly where the functional or locational requirements of Heathrow expansion justify an alternative location. This would avoid a situation in which infrastructure needed to manage waste generated by Heathrow expansion is constrained because the baseline need had not been captured in the general waste forecasts on which the Plan is based.

Policy WLWP 5 and its supporting text should similarly make clear that a demonstrated project-specific requirement associated with Heathrow expansion may establish the relevant need for recovery or disposal capacity where material cannot practicably and reasonably be re-used, recycled or otherwise recovered. This would not displace the waste hierarchy or the environmental safeguards in the policy, but would ensure that the need test is not applied by reference only to the general capacity forecasts which do not presently demonstrate that Heathrow expansion has been fully reflected.

Currently, HWL considers that the draft Plan is unsound in these respects because it is not adequately justified or effective, and is not fully consistent with national policy, because the evidence base does not demonstrate that the foreseeable waste implications of Heathrow expansion have been appropriately addressed in baseline waste projections and the policy framework is not yet sufficiently flexible to respond to them. HWL considers that Main Modifications reflecting these issues (including consideration of a new bespoke policy to address waste management issues resulting from Heathrow expansion), alongside a clear monitoring and early-review mechanism, could provide a proportionate means of addressing these matters without requiring additional site allocations at this stage.

Conclusion

To reiterate, the ANPS (and once designated, the HENPS) will constitute the primary policy document and decision-making framework as it relates to any DCO application for expansion at Heathrow Airport, and therefore, this should be explicitly set out in the West London Waste Plan.

HWL also considers that the draft Plan should provide a sufficiently flexible policy framework to respond to the waste management requirements of Heathrow expansion as these become better defined. HWL is not seeking the allocation of additional waste management sites at this stage. Instead, the identified soundness concerns could be addressed proportionately through modifications to Policies WLWP 1, WLWP 2 and WLWP 5 (or alternatively through a policy bespoke to Heathrow expansion), and associated supporting text, to ensure that the loss or reconfiguration of safeguarded capacity, provision of additional or replacement waste management infrastructure, and any project-specific recovery or disposal requirements can be considered appropriately where justified by Heathrow expansion. This should be supported by an effective monitoring and early-review mechanism.

HWL therefore considers that these matters should be addressed through the Examination of the Plan and wishes to retain the opportunity to be invited to participate in relevant hearing sessions.

HWL also reserves its position to provide further technical evidence on these matters as the Heathrow expansion proposals and associated waste management requirements develop, subject to the Inspector's directions.

We welcome engagement with West London LPAs and we would be grateful if you could keep us informed of any further consultations relating to the West London Waste Plan.

Should you have any further queries, please contact Sarah Price at DWD, and copy in her colleagues:

[redacted]

Yours sincerely,

[redacted]

Ries-William Lamont

[redacted]

Consultation on the Proposed Submission West London Waste Plan

From 4th August to 28th September 2026

RESPONSE FORM

The London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond-upon-Thames and the Old Oak and Park Royal Development Corporation are inviting comments on the Proposed Submission West London Waste Plan (WLWP).

The Proposed Submission WLWP sets out the proposed planning strategy for waste management in the plan area up to 2041, including identifying sites proposed to be safeguarded for waste use.

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

- Policy WLWP 1 – Safeguarding Waste Sites
- Policy WLWP 2 – Provision of Additional Waste Management Capacity
- Policy WLWP 3 – Residual Waste Management and Energy Recovery
- Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities
- Policy WLWP 5 – Recovery and Disposal of Waste to Land
- Policy WLWP 6 – Circular Economy and Resource Efficiency
- Policy WLWP 7 – Wastewater Treatment Infrastructure

This consultation is the final opportunity to comment on the Proposed Submission WLWP before it is submitted to the Secretary of State for independent 'examination in public'. We would like to hear views from our local communities, businesses and other stakeholders. At this stage in the plan making process, in accordance with the national guidance, consultation responses should focus on whether the WLWP has been developed in compliance with the relevant legal and procedural requirements, including that the plan should be in general conformity with the London Plan, and the 'soundness' of the Plan. A guidance note and answers to Frequently Asked Questions provide further detail on these terms – this document is available on the online consultation portal (via the link below) alongside other supporting information.

How to respond

All the information needed to take part in the consultation can be found on Ealing Council's online consultation portal: https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation This includes the Proposed Submission WLWP, maps and all supporting evidence. Printed copies of the Plan and key supporting documents will also be available to view at the west London Boroughs' and OPDC's main offices and selected venues in the WLWP plan area. For further information on these, please visit the online consultation portal.

You can comment on the consultation documents in the following ways:

- Online questionnaire on the consultation portal https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation
- Email a response form to WLWastePlan@ealing.gov.uk a PDF and Word version of the form can be found at

https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation . In the form, in 'Word' format you can type in your response and return it as an email attachment.

- Complete and post printed copies of the response form to the address given below. Printed copies are available at the selected locations listed on the consultation portal.
- Post written responses to:

  Planning and Infrastructure
  West London Alliance
  Ealing Council
  5th Floor, Perceval House
  14-16 Uxbridge Road
  Ealing, W5 2HL

All responses must be received by 23:59 on Monday 28th September 2026.

This form has two parts:

- Part A – Personal details and About You
- Part B – Your detailed response(s).

If you wish to comment on multiple documents or sections of the plan or supporting material, then we recommend that you download and use a separate Part B form for each comment and attach these to your postal response or email.

Part A: Personal Details		
	1. Personal Details *	**2. Agent's Details (if applicable)**
Title	Mr	
First name	Simon	
Last name	Marsh	
Job title (where relevant)	[redacted]	
Organisation (where relevant)	Herts & Middlesex Wildlife Trust	
Address	[redacted]	
Postcode	[redacted]	
Telephone	[redacted]	
E-mail address	[redacted]	

*If an agent is appointed, please provide the full contact details of the agent plus the person (title, name) or organisation they are acting for.

Part A: About You…	
3. Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	
[redacted]	
[redacted]	
[redacted]	
Other - please state what your specific interest in west London might be.	The Herts & Middlesex Wildlife Trust is the leading voice for wildlife conservation in Hertfordshire and Middlesex (including the London Boroughs of Harrow and Hillingdon)

Data protection

We will ensure that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure.

The Privacy Statement is published on the webpage https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

All responses will be held by the London Borough of Ealing. Responses will not be treated as confidential and will be published on its website and in any subsequent statements, attributed by name and/or organisation; however, personal details like address, phone number or email address will be removed.

If you submit comments, your consultation responses and personal data will be passed to the Planning Inspectorate and a Programme Officer. The Programme Officer manages the procedural and administrative aspects of the examination. The Programme Officer will contact you using the personal

information you have provided if you have indicated in the response form your wish to engage in the Examination.

Part B: Your Detailed Response			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
If you have more detailed comments to make on what the Plan should contain, please download the form, Part B– Additional Responses Continued, or print additional versions of this form, being clear about page numbers, paragraphs or infographics to which they apply, and append to your response form.			
Documents		**Sections**	
Proposed Submission West London Waste Plan	x	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Site no./ name (see Appendices to the Plan)	Proposed Site 1, Broadwater Lake
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		

5. Do you consider the West London Waste Plan is:		
5.1 Legally compliant	Yes X	No ☐
5.2 Sound	Yes X	No ☐

Further information on these terms is included within the guidance note and answers to Frequently Asked Questions available on the website at https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.

HMWT supports the soundness of the Waste Plan in relation to the exclusion of Proposed Site 1 at Broadwater Lake, Moorhall Road in Hillingdon. We note that Tarmac proposed this allocation as a backstop in the event that the planning application for the Hillingdon Watersports Facility & Activity Centre (HWFAC) was unsuccessful (application 2382/APP/2023/2906). Hillingdon Council resolved to grant approval for this application on 21/04/26 subject to a legal agreement. HMWT manages a nature reserve at Broadwater Lake, although currently HS2 works are limiting access. The HWFAC application was very controversial, largely because Broadwater Lake is part of the Mid-Colne Valley Site of Special Scientific Interest. This point is overlooked in the Waste Plan Consultation Statement, but any allocation or development here raises issues of national significance for biodiversity. Any application would likely require Environmental Impact Assessment and the most careful scrutiny. We cannot find any reference to this site in the Integrated Impact Assessment; Sites 2 and 3 are considered at Appendix E, but not Site 1.

Had the Waste Plan included this site, HMWT would have likely objected as the Plan process has not allowed for close scrutiny with the involvement of key stakeholders. As it is, we support the conclusion of the Consultation Statement.

Please continue on a separate sheet / expand box if necessary.
7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
None.
Please continue on a separate sheet / expand box if necessary.
Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.*
8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X **No**, I do not wish to participate in hearing session(s)	☐ **Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.
9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*
10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the West London Waste Plan.

If you do not wish to be notified of future updates on the West London Waste Plan, then please tick this box, complete Part A: Personal Details of this form and return it to us. Note your name, business (if entered) and response will still be published in the consultation report.	☐

Signature:	Simon Marsh	Date:	23/09/26
For electronic responses a typed signature is acceptable.			

Historic England

WLWP Project Manager
West London Waste Plan

Your Ref:
Our Ref: 240521

Contact: [redacted]

25 September 2026

To whom it may concern,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2026

West London Waste Plan (Regulation 19 Proposed Submission)
The London boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond-upon-Thames and the Old Oak and Park Royal Development Corporation are inviting comments on the Regulation 19 Proposed Submission West London Waste Plan (WLWP).

GLAAS Archaeological Advice: See Recommendations Below

Thank you for your consultation received on 04 August 2026.

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice in accordance with the National Planning Policy Framework and GLAAS Charter.

The plan makes little reference to either the historic environment in general, or archaeology specifically. However, the impact of development on heritage assets of all kinds is a material planning consideration which should be handled in accordance with relevant NPPF and London Plan policies. The Integrated Impact Assessment draws attention to this weakness saying (3.40): "Although there is a high level of protection afforded historic sites within the NPPF and NPPW, more of an emphasis could be placed within the WLWP on requiring any waste redevelopments to be designed and built so as to minimise adverse effects on the county's historic environment above and below ground". We agree with that comment.

Archaeological impacts can occur in relation to new developments within or extension of existing waste sites, construction of new waste sites and disposal of waste on land. Large-scale disposal of inert waste on land has been a feature of major infrastructure projects (e.g. High Speed 2) with consequent impact on historic landscape, buried archaeological remains

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and the setting of nearby heritage assets. Across Greater London, local plans and planning decisions affecting archaeology are informed by a system of Archaeological Priority Areas (APA) based on evidence held in the Greater London Historic Environment Record.This system is endorsed by London Plan Policy HC1 and its supporting text and borough local plans.

We therefore request that Policies WLWP2 and WLWP 4 make specific mention of the need to consult the Greater London Archaeological Advisory Service and, where necessary, undertake appropriate archaeological assessment and, where appropriate, mitigation.

This response relates solely to archaeological issues.

Yours sincerely

Greer Dewdney

[redacted]

Historic England, [redacted]
Telephone [redacted] | historicengland.org.uk

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West London Waste Plan Consultation

This is a response by myself and Hounslow Green Party to the Regulation 19 consultation taking place in August / September 2026 as described at [1] and [3]. Responses are to be sent to WLWastePlan@ealing.gov.uk by 23:59 on 28th September 2026.

The plan is unsound as it does not properly address greenhouse gas emissions from energy from waste / incineration.

1. Clause 8.37 of the West London Waste Plan (WLWP) [1] references the Sixth Carbon Budget documentation from the Climate Change Committee (CCC). It should reference the Seventh Carbon Budget (published February 2025) documentation [2] to be sound.
2. Clause 8.35 of [1] states the minimum performance of 400 gCO2/kWh of electricity from Energy from Waste (EfW). This is now considered high carbon electricity. The WLWP should contain an ambition for West London to use progressively lower gCO2/kWh EfW suppliers.
3. Table 7.8.1 of the Seventh Carbon Budget [2] anticipates 100% of EfW with CCS (Carbon Capture and Storage) by 2050. This is referred to as CCUS in [1] 8.37. The WLWP is not clear enough that it has located EfW plants in West London or outside it that will achieve the net-zero carbon emissions from this waste by 2050. This needs to be a key part of the plan for it to be sound.
4. Table 7.8.1 of [2] has an intermediate 2030 target of 22% of EfW capacity with CCS. There is nothing in the WLWP that ensures that West London will achieve their share of this target by exporting their waste to suitable EfW plants. The WLWP should contain increasingly ambitious gCO2/kWh for EfW.
5. [1] Figure 7 shows Non inert waste to EfW from West London in 2023. This is ~500,000 tonnes per annum. To be sound the WLWP should contain targets showing progressively lower use of non inert to EfW as treatment and recycling share increases (see [2] Figure 7.8.2 where the CCC foresee a large part of the emissions reductions being achieved by waste reduction).
6. [1] Table1 has increasing waste arising from 2021 to 2041. The only sound ecological approach left to us in the current Climate and Ecological Emergency is to decrease the waste arising, rather than increase our wastefulness.
7. [1] section 6.2 has strategic objectives, but none of them is clear enough that where waste is handled outside the West London area, it should be treated close to West London where possible.
8. [1] section 1.7 says that West London has sufficient capacity for forecast waste arisings, other than for landfill. West London clearly does not have any capacity now or planned in [1] zero carbon emissions capacity for EfW.
9. [1] 5.8 has ambitions for landfill for 2030. The WLWP does not mention the CCC ambition to eliminate all waste to landfill by 2045 ([2] Table 7.8.1). This should be included in the WLWP for it to be sound.
10. While the WLWP Climate Change Topic Paper [4] raises some of the concerns raised in this consultation response, the actual WLWP [1] does not adequately address the climate change impacts of the plan and is thus unsound.
11. While this consultation is framed in terms of inconsistencies in what the government is advised to do by the CCC [2] and what is in the WLWP [1], the CCC

proposals are quite inadequate to be the UK's share of meeting the climate targets (1.5C/2C) of the Paris Agreement. As a result, we are currently heading for very large temperature rises with danger of ecological tipping points. This plan needs to show more ambition than proposed by the CCC, not less. This plan needs to take the climate emergency seriously.

References

[1] West London Waste Plan – Proposed Submission
https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

[2] Climate Change Committee Seventh Carbon Budget https://www.theccc.org.uk/wp-content/uploads/2025/02/The-Seventh-Carbon-Budget.pdf

[3] Hounslow Council Consultation https://talk.hounslow.gov.uk/consultation-on-the-draft-updated-west-london-waste-plan-regulation-18-consultation

[4] West London Waste Plan – Climate Change Topic Paper
https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

Tony Firkins
28 September 2026

Email: [redacted]
Tel: [redacted]

Our ref: 130-2026-09-28-MM-L
Your ref:

Date: 28-09-2026

Sent by email only

Planning and Infrastructure
West London Alliance
Ealing Council
5th Floor, Perceval House
14-16 Uxbridge Road
Ealing
W5 2HL

Dear Madam / Sir,

Response to Regulation 19 Consultation on the Proposed Submission West London Waste Plan

Site: B16 - Hannah Close, off Great Central Way, Neasden

1) Background

We write for and on behalf of our client L&B Holdings Limited (L&B). L&B owns 3 Hannah Close, Great Central Way, Neasden, London, NW10 0UX. Its site is identified as site "B16" in the Proposed Submission West London Waste Plan (WLWP).[1]

In this letter the Planning and Infrastructure West London Alliance will be referred to as the "Alliance".

A Response Form to this Regulation 19 consultation is attached to this letter.

2) Size of site area identified as safeguarded

L&B welcomes that the size of the safeguarded area has been reduced by about 1/3. With this being so that it is consistent with the boundary shown for Environmental Permit reference: EPR/DP3791NJ.

It is noted that permit was granted in December 1998. Therefore, it existed at the time the current WLWP was adopted in 2015 (more than 11 years ago). The boundary of the permitted site is no different today than it was then.

L&B wrote to [redacted], Head of Planning & Development Services as recently as 25/09/2025 (one year ago). It explained the site boundary shown for its facility was incorrect. It asked for assistance with amending the designated area. L&B was responded to by [redacted], Principal Planning Policy email dated 2 October 2025, explaining that the *"only"* route for the correction of the boundary was through the *"development plan adoption process"*.

Various issues of complaint (including as to whether the previous plan was actually sound, and whether this new plan – since it assumes the previous plan was sound) fall from this. The issues include:

a) L&B has been put through entirely unnecessary bureaucracy - and cost - to achieve a just outcome;
b) it was always factually wrong to designate the whole of L&B's site (including the area which had no functional connection with L&B's waste activities) and the actual highway of Hannah Close, as safeguarded;

[1] Regulation 19 Proposed Submission West London Waste Plan, May 2026.

c) that the WLWP needs amendment. The amendments must include that the proposed WLWP must be drafted to include policies in it which are capable of genuinely responding to change. Such as in cases where the plan is factually wrong (as in the case we state for L&B above);

d) with regard to bullet (c) above, that the planning authority, when applying policies in the plan actually responds comprehensively and properly. Including that they do so in a timely manner. L&B's example proves that there is a deficiency in the current WLWP, and no suitable mechanism is proposed within the forthcoming WLWP capable of addressing this serious shortfall;

e) the replies received by L&B appear disinterested in genuinely resolving the queries put in front of them. Preferring instead to continue to put the onus on the landowner. And in doing so, to then insist that L&B can only seek change through a process, the date for which was not advised to L&B. L&B says business isn't here just to serve the councils' planning function. It is also here to play its part in making economic, environmental and social progress. Included in this is providing employment opportunities, undertaking innovation, including through the appropriate use, re-use and repurposing of land. L&B explained in its Regulation 18 response to the Alliance[2] that the safeguarding designation has stifled interest in the site. This imposed direct economic impact on L&B. It also denies opportunity to others to provide economic, environmental and social progress. This is in nobody's best interests.

3) L&B's representation at Regulation 18 consultation – request the Alliance corrects the record

L&B's Regulation 18 response included calculations showing the then stated "assessed capacity" (16,696 tonnes) as percentage figures of the then stated waste current capacity contribution of Brent (408,545 tonnes) and the WLWP area (1,484,795 tonnes). It calculated as follows:

- 4% of Brent's C&D waste current capacity contribution;[3,4]
- 1% of the WLWP area's C&D waste capacity contribution in 2027.[5]

L&B also said if its site was released from safeguarding, it would reduce the capacity surplus across the WLWP area in 2041 by:

- 1.4%.[6]

Thus, leaving a surplus in 2041 of:

- 1,159,340 tonnes.[7]

The Regulation 19 consultation publishes a Regulation 18 Consultation Statement (herein the "Statement").[8] At page 38 the Statement includes a table responding to L&B's submission (reproduced below).

[2] Response to Regulation 18 Consultation, Site: "B16 - Hannah Close, off Great Central Way, Neasden", Waste Planning & Permitting Limited, dated 05/02/2026, ref: 130-2026-02-05-MM-L.
[3] Calculated from the data presented for sites B02 to B16, Appendix 1, Updated West London Waste Plan – Assessment of Existing Capacity in West London 2025, Regulation 18, Version 2.0, December 2025.
[4] Calculation: (16,696 ÷ 408,545) x 100 = 4%
[5] Calculation: (16,696 ÷ 1,484,795) x 100 = 1%
[6] Calculation: (16,696 ÷ 1,176,036) x 100 = 1.4%. The data being taken from the report specified in footnote 2.
[7] Calculation: 1,176,036 – 16,696 = 1,159,340.
[8] West London Waste Plan, Regulation 18 Consultation Statement, Final v2.2 28.05.26.

Table 1 L&B's representation at Regulation 18 consultation stage

Part of Plan (references to Draft Plan Reg 18)	Subject of representation	Representor	Response
B16 Off Great Central Way, Neasden	Should be released from safeguarding. Waste acceptance ceased in December 2023. If released, would reduce surplus capacity by 4% leaving surplus by 2041 of 1,159,340t. Site well located for alternative use, which safeguarding stifles	On behalf of L&B Haulage (site occupier)	**No change proposed** - site retained as meets proposed WLWP safeguarding criteria.

L&B says the Alliance has mis-stated its representation. In summarising L&B's response the Alliance appears to imply that L&B said if its site were released it would reduce the surplus capacity by 4% in the WLWP area. L&B did not say that.

L&B said it its site accounted for 4% of Brent's current capacity, 1% of WLWP's current capacity and if lost from the WLWP, 1.4% of the then stated surplus capacity predicted for 2041 would be lost.

L&B request the Alliance correct the record. In L&B's view the clarification should read:

"Should be released from safeguarding. Waste acceptance ceased in December 2023. If released, would reduce surplus capacity by ~~4%~~ 1% in West London leaving a surplus by 2041 of 1,159,340t. Site well located for alternative use, which safeguarding stifles"

4) Assessed capacity – review of WDI data, 8,900 tonnes should be taken forward as the figure for B16

L&B notes the site's "assessed capacity" is stated as 16,696 tonnes of CDEW.[9,10] It notes the figure was included in the currently adopted plan (2015). It notes the figure has been rolled forward into the proposed WLWP. L&B has taken an opportunity to review the WDI data for its site. It presents this in the table below.[11]

Table 2: WDI data to date

Year	Received (tonnes)	5 year rolling maximum (tonnes)
2006	37,729	
2007	27,982	
2008	19,582	
2009	21,695	

[9] Construction, Demolition and Excavation Waste (CDEW).
[10] Site B16, Appendix 3, Regulation 19 Proposed Submission WLWP .
[11] Waste Data Interrogator

Year	Received (tonnes)	5 year rolling maximum (tonnes)
2010	20,932	37,729
2011	16,696	27,982
2012	11,112	21,695
2013	3,428	21,695
2014	5,847	20,932
2015	3,640	16,696
2016	5,400	11,112
2017		5,847
2018	8,900	8,900
2019		8,900
2020		8,900
2021		8,900
2022		8,900
2023		
2024		
2025		

It notes the 16,696 tonnes figure relates to the year 2011. And that it would have been the highest peak figure in the 5-year rolling period up to the date of the adoption of the 2015 Plan.

With respect to wider market conditions. L&B's experience of the waste industry is that waste tonnages received into its site in this location reduced over time. This trend is plainly visible in the WDI data above. L&B considers this trend to be typical across the industry. And it is among the reasons leading to L&B's closure of the site.

The pattern (as to declining tonnages) is also recognised in the representation made by British Land to the Regulation 18 consultation[12]. The Alliance should note its site is adjacent to L&B's.

Reviewing the WDI data for waste received into L&B's site over the current 5-year rolling period identifies a figure of 8,900 tonnes.

It therefore requests the "assessed capacity" for its site is given as 8,900 tonnes. With the waste being in respect of CDEW. And the process being transfer, not treatment.

5) Comment on the revised assessed capacity figure advocated by L&B and reflections on policy

L&B considers its revised assessed capacity figure of 8,900 tonnes has been arrived at in a way that is consistent with the currently adopted development plan. And whilst taking account, and placing relevant weight, on proposals in the Regulation 19 consultation. Such as within the written statement accompanying the Proposed Submission West London Waste Plan May 2026, including at Chapter 8: Proposed Policies, noting:

[12] Regulation 18 Consultation response, 2-6 (even), Hannah Close, London, NW10 0UX, ref: HS/MG/DP 6312, dated 5 February, by DP9 Ltd.

- the *"Policy Purpose"* includes *"... Protecting, enhancing and optimising the existing network of waste sites so that **sufficient** ... capacity is provided for the Plan period..."*, therefore that the capacity needs to meet the threshold of being **sufficient** [emphasis added];
- paragraph 8.4 (referring to London Plan 2021 policy SI 9) *"The purpose of safeguarding ... is to ensure **sufficient** capacity is maintained in west London..."* [emphasis added];
- paragraph 8.5 *"The London Plan 2021 allows for the redevelopment of existing waste sites...There is also a provision in the London Plan that allows for site release **without replacement capacity being provided where it is demonstrated there is already sufficient capacity**..."* (albeit that the paragraph makes the narrow point with respect to apportioned waste rather than unapportioned waste as is the case with C&D waste at L&B's site [emphasis added]),
- that policy WLWP 1(F) allows for the deliberation of a number of factors including *"wider market conditions"*. But – because of the way in which the policy is drafted - such evaluation cannot be undertaken unless a planning application (for redevelopment) is under consideration. A direct effect of this policy is that prospective developers have little alternative than to go to the expense of formulating a planning application (with all the cost and time that such entails). A reality to this is that developers tend to be averted by the risk of planning failure. Consequently, very few developers would likely take such a risk. The policy, as currently drafted, therefore inhibits innovation, economic growth, social progress etc. Development plan policy needs to strike a better balance between the provision of **sufficient** (but not more than *"sufficient"*) waste capacity and developer access to the land resource where that land could be put to better use. L&B considers that where it is plain (as appears to be the case for West London) that surplus waste capacity would still be available after the loss of a site then the balance should weigh in favour of the release of land to a non-waste use. The current approach serves instead to sterilise land from use – the waste use cannot pay its way and the alternative uses tend not to come forward (developer aversion);
- the Regulation 18 response from the East London Boroughs, and the inconclusive replies by the Alliance as to the need for (and lack of) a formal process for capacity sharing across London.[13] L&B considers it is caught in the middle of that issue: its site being inhibited from release even though there appears to be surplus capacity.

Furthermore, London Plan Policy SI 9 and particularly the principle in paragraph 9.9.3 allows for sites to be released where sufficient capacity exists elsewhere. This is particularly relevant when the WLWP's own figures show a very substantial surplus remaining even after site B16 is removed.

[13] West London Waste Plan, Regulation 18 Consultation Statement, Version: Final v2.2 28.05.26, page 54.

6) Comparison of the revised assessed capacity (section (4) above) with the revised surplus capacity figures now presented in the Regulation 19 consultation

L&B note the Regulation 19 consultation presents revised figures for the predicted capacity surplus.[14] The surplus for C&D waste arisings in 2041 for West London is now given as 851,204 tonnes. Accordingly, if L&B's proposed revised assessed capacity were to be lost from West London the impact on surplus capacity would be:

- (8,900 ÷ 851,204) x 100 = 1.0%

L&B submits the loss of this 1% would be insignificant.

Including that such loss would still leave a surplus capacity of some 842,304 tonnes. It further says even after the loss of its contribution sufficient suitable waste management capacity would remain.

7) Alternative non-waste planning uses

L&B's site is located in the area covered by the Wembley Area Action Plan on land identified as a Strategic Industrial Location (SIL).[15] As such it is well suited to assist in the delivery of economic growth and employment, including as envisaged at Brent Local Plan policy BE1.[16]

The site is well located and likely suitable for a range of alternative non-waste uses. But L&B knows that the current waste safeguarding designation stifles such interest. This prejudices new investment, preventing evolution and innovation, inhibiting the delivery of wider planning and regeneration objectives in the area.

8) Closing comments

Given the issues set out above, L&B questions whether the updated WLWP is sound.

L&B does not consider it is justified to retain site B16 as a safeguarded waste site. Including because the site makes only a limited contribution to waste management capacity and in the context of the scale of the surplus capacity identified in the WLWP.

L&B therefore requests that site B16 is removed from the submission version of the WLWP – i.e. site B16 is deleted from the schedule of safeguarded waste sites and the Policies Map is updated to remove the safeguarding notation. If the Alliance insists on retaining B16 in the submission version of the WLWP, it is asked to respond in writing to L&B and specifically address why, with such a large overcapacity for C&D waste, and the site's location in the Wembley Area Action Plan area, site B16 should still remain in the WLWP – why is it required?

[14] Table 5: Forecast non-hazardous C & D waste arisings for West London compared to estimated non-hazardous C & D Waste Management Capacity in West London (tpa), page 15, Proposed Submission West London Waste Plan Assessment of Existing Waste Capacity in West London 2025, Regulation 19 Version: 3.1, July 2026.
[15] Wembley Area Action Plan, Brent Council, January 2015.
[16] Policy BE1 "Economic Growth and Employment Opportunities For All", Brent Local Plan 2019-2041, London Borough of Brent, February 2022.

L&B also reserves its position to participate in the Examination Hearings if site B16 remains safeguarded when the WLWP is submitted.

Yours faithfully,

[redacted]

Matt Mehegan
[redacted]

Enclosure: Response Form, Regulation 19 Consultation, Proposed Submission West London Waste Plan. Form dated 28/09/2026.

Part A: Personal Details		
	1. Personal Details *	**2. Agent's Details (if applicable)**
Title	[redacted]	Mr
First name	[redacted]	Matt
Last name	[redacted]	Mehegan
Job title (where relevant)	[redacted]	[redacted]
Organisation (where relevant)	[redacted]	Waste Planning & Permitting Limited
Address	[redacted]	[redacted]
Postcode	[redacted]	[redacted]
Telephone	c/o agent	[redacted]
E-mail address	c/o agent	[redacted]

*If an agent is appointed, please provide the full contact details of the agent plus the person (title, name) or organisation they are acting for.

Part A: About You...	
3. Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	
[redacted]	
[redacted]	
[redacted]	
Other - please state what your specific interest in west London might be.	Landowner at NW10 0UX

Data protection

We will ensure that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure.

The Privacy Statement is published on the webpage https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

All responses will be held by the London Borough of Ealing. Responses will not be treated as confidential and will be published on its website and in any subsequent statements, attributed by name and/or organisation; however, personal details like address, phone number or email address will be removed.

If you submit comments, your consultation responses and personal data will be passed to the Planning Inspectorate and a Programme Officer. The Programme Officer manages the procedural and administrative aspects of the examination. The Programme Officer will contact you using the personal information you have provided if you have indicated in the response form your wish to engage in the Examination.

Part B: Your Detailed Response			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
If you have more detailed comments to make on what the Plan should contain, please download the form, Part B– Additional Responses Continued, or print additional versions of this form, being clear about page numbers, paragraphs or infographics to which they apply, and append to your response form.			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☐	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Site no./ name (see Appendices to the Plan)	
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	✓ ☐	See written representations	

5. Do you consider the West London Waste Plan is:		
5.1 Legally compliant		No ✓ ☐
5.2 Sound		No ✓ ☐
Further information on these terms is included within the guidance note and answers to Frequently Asked Questions available on the website at https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation		
6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.		
See written representations		
Please continue on a separate sheet / expand box if necessary.		
7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.		
See written representations		
Please continue on a separate sheet / expand box if necessary.		

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.*

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

)	**Yes** ✓, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

See written representations

10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the West London Waste Plan.

If you do not wish to be notified of future updates on the West London Waste Plan, then please tick this box, complete Part A: Personal Details of this form and return it to us. Note your name, business (if entered) and response will still be published in the consultation report.	☐

Signature:	M C Mehegan	Date:	28/09/2026

For electronic responses a typed signature is acceptable.

Email: [redacted]
Tel: [redacted]

Our ref: 130-2026-09-28-MM-L
Your ref:

Date: 28-09-2026

Sent by email only

Planning and Infrastructure
West London Alliance
Ealing Council
5th Floor, Perceval House
14-16 Uxbridge Road
Ealing
W5 2HL

Dear Madam / Sir,

Response to Regulation 19 Consultation on the Proposed Submission West London Waste Plan

Site: B16 - Hannah Close, off Great Central Way, Neasden

1) Background

We write for and on behalf of our client L&B Holdings Limited (L&B). L&B owns 3 Hannah Close, Great Central Way, Neasden, London, NW10 0UX. Its site is identified as site "B16" in the Proposed Submission West London Waste Plan (WLWP).[1]

In this letter the Planning and Infrastructure West London Alliance will be referred to as the "Alliance".

A Response Form to this Regulation 19 consultation is attached to this letter.

2) Size of site area identified as safeguarded

L&B welcomes that the size of the safeguarded area has been reduced by about 1/3. With this being so that it is consistent with the boundary shown for Environmental Permit reference: EPR/DP3791NJ.

It is noted that permit was granted in December 1998. Therefore, it existed at the time the current WLWP was adopted in 2015 (more than 11 years ago). The boundary of the permitted site is no different today than it was then.

L&B wrote to [redacted], Head of Planning & Development Services as recently as 25/09/2025 (one year ago). It explained the site boundary shown for its facility was incorrect. It asked for assistance with amending the designated area. L&B was responded to by [redacted], Principal Planning Policy email dated 2 October 2025, explaining that the *"only"* route for the correction of the boundary was through the *"development plan adoption process"*.

Various issues of complaint (including as to whether the previous plan was actually sound, and whether this new plan – since it assumes the previous plan was sound) fall from this. The issues include:

a) L&B has been put through entirely unnecessary bureaucracy - and cost - to achieve a just outcome;
b) it was always factually wrong to designate the whole of L&B's site (including the area which had no functional connection with L&B's waste activities) and the actual highway of Hannah Close, as safeguarded;

[1] Regulation 19 Proposed Submission West London Waste Plan, May 2026.

c) that the WLWP needs amendment. The amendments must include that the proposed WLWP must be drafted to include policies in it which are capable of genuinely responding to change. Such as in cases where the plan is factually wrong (as in the case we state for L&B above);

d) with regard to bullet (c) above, that the planning authority, when applying policies in the plan actually responds comprehensively and properly. Including that they do so in a timely manner. L&B's example proves that there is a deficiency in the current WLWP, and no suitable mechanism is proposed within the forthcoming WLWP capable of addressing this serious shortfall;

e) the replies received by L&B appear disinterested in genuinely resolving the queries put in front of them. Preferring instead to continue to put the onus on the landowner. And in doing so, to then insist that L&B can only seek change through a process, the date for which was not advised to L&B. L&B says business isn't here just to serve the councils' planning function. It is also here to play its part in making economic, environmental and social progress. Included in this is providing employment opportunities, undertaking innovation, including through the appropriate use, re-use and repurposing of land. L&B explained in its Regulation 18 response to the Alliance[2] that the safeguarding designation has stifled interest in the site. This imposed direct economic impact on L&B. It also denies opportunity to others to provide economic, environmental and social progress. This is in nobody's best interests.

3) L&B's representation at Regulation 18 consultation – request the Alliance corrects the record

L&B's Regulation 18 response included calculations showing the then stated "assessed capacity" (16,696 tonnes) as percentage figures of the then stated waste current capacity contribution of Brent (408,545 tonnes) and the WLWP area (1,484,795 tonnes). It calculated as follows:

- 4% of Brent's C&D waste current capacity contribution;[3,4]
- 1% of the WLWP area's C&D waste capacity contribution in 2027.[5]

L&B also said if its site was released from safeguarding, it would reduce the capacity surplus across the WLWP area in 2041 by:

- 1.4%.[6]

Thus, leaving a surplus in 2041 of:

- 1,159,340 tonnes.[7]

The Regulation 19 consultation publishes a Regulation 18 Consultation Statement (herein the "Statement").[8] At page 38 the Statement includes a table responding to L&B's submission (reproduced below).

[2] Response to Regulation 18 Consultation, Site: "B16 - Hannah Close, off Great Central Way, Neasden", Waste Planning & Permitting Limited, dated 05/02/2026, ref: 130-2026-02-05-MM-L.
[3] Calculated from the data presented for sites B02 to B16, Appendix 1, Updated West London Waste Plan – Assessment of Existing Capacity in West London 2025, Regulation 18, Version 2.0, December 2025.
[4] Calculation: (16,696 ÷ 408,545) x 100 = 4%
[5] Calculation: (16,696 ÷ 1,484,795) x 100 = 1%
[6] Calculation: (16,696 ÷ 1,176,036) x 100 = 1.4%. The data being taken from the report specified in footnote 2.
[7] Calculation: 1,176,036 – 16,696 = 1,159,340.
[8] West London Waste Plan, Regulation 18 Consultation Statement, Final v2.2 28.05.26.

Table 1 L&B's representation at Regulation 18 consultation stage

Part of Plan (references to Draft Plan Reg 18)	Subject of representation	Representor	Response
B16 Off Great Central Way, Neasden	Should be released from safeguarding. Waste acceptance ceased in December 2023. If released, would reduce surplus capacity by 4% leaving surplus by 2041 of 1,159,340t. Site well located for alternative use, which safeguarding stifles	On behalf of L&B Haulage (site occupier)	**No change proposed** - site retained as meets proposed WLWP safeguarding criteria.

L&B says the Alliance has mis-stated its representation. In summarising L&B's response the Alliance appears to imply that L&B said if its site were released it would reduce the surplus capacity by 4% in the WLWP area. L&B did not say that.

L&B said it its site accounted for 4% of Brent's current capacity, 1% of WLWP's current capacity and if lost from the WLWP, 1.4% of the then stated surplus capacity predicted for 2041 would be lost.

L&B request the Alliance correct the record. In L&B's view the clarification should read:

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4) Assessed capacity – review of WDI data, 8,900 tonnes should be taken forward as the figure for B16

L&B notes the site's "assessed capacity" is stated as 16,696 tonnes of CDEW.[9,10] It notes the figure was included in the currently adopted plan (2015). It notes the figure has been rolled forward into the proposed WLWP. L&B has taken an opportunity to review the WDI data for its site. It presents this in the table below.[11]

Table 2: WDI data to date

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The pattern (as to declining tonnages) is also recognised in the representation made by British Land to the Regulation 18 consultation[12]. The Alliance should note its site is adjacent to L&B's.

Reviewing the WDI data for waste received into L&B's site over the current 5-year rolling period identifies a figure of 8,900 tonnes.

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Yours faithfully,

[redacted]

Matt Mehegan

[redacted]

Waste Planning & Permitting Limited

Enclosure: Response Form, Regulation 19 Consultation, Proposed Submission West London Waste Plan. Form dated 28/09/2026.

Part A: Personal Details		
	1. Personal Details *	**2. Agent's Details (if applicable)**
Title	[redacted]	Mr
First name	[redacted]	Matt
Last name	[redacted]	Mehegan
Job title (where relevant)	[redacted]	[redacted]
Organisation (where relevant)	L&B Holdings Limited	Waste Planning & Permitting Limited
Address	c/o agent	[redacted]
Postcode	[redacted]	[redacted]
Telephone	c/o agent	[redacted]
E-mail address	c/o agent	[redacted]

*If an agent is appointed, please provide the full contact details of the agent plus the person (title, name) or organisation they are acting for.

Part A: About You...	
3. Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	
[redacted]	
[redacted]	
[redacted]	
Other - please state what your specific interest in west London might be.	Landowner at NW10 0UX

Data protection

We will ensure that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure.

The Privacy Statement is published on the webpage https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

All responses will be held by the London Borough of Ealing. Responses will not be treated as confidential and will be published on its website and in any subsequent statements, attributed by name and/or organisation; however, personal details like address, phone number or email address will be removed.

If you submit comments, your consultation responses and personal data will be passed to the Planning Inspectorate and a Programme Officer. The Programme Officer manages the procedural and administrative aspects of the examination. The Programme Officer will contact you using the personal information you have provided if you have indicated in the response form your wish to engage in the Examination.

Part B: Your Detailed Response			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
If you have more detailed comments to make on what the Plan should contain, please download the form, Part B– Additional Responses Continued, or print additional versions of this form, being clear about page numbers, paragraphs or infographics to which they apply, and append to your response form.			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☐	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Site no./ name (see Appendices to the Plan)	
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	✓ ☐	See written representations	

5. Do you consider the West London Waste Plan is:		
5.1 Legally compliant		No ✓ ☐
5.2 Sound		No ✓ ☐
Further information on these terms is included within the guidance note and answers to Frequently Asked Questions available on the website at https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation		
6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.		
See written representations		
Please continue on a separate sheet / expand box if necessary.		
7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.		
See written representations		
Please continue on a separate sheet / expand box if necessary.		

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.*

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

)	**Yes** ✓, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

See written representations

10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the West London Waste Plan.

If you do not wish to be notified of future updates on the West London Waste Plan, then please tick this box, complete Part A: Personal Details of this form and return it to us. Note your name, business (if entered) and response will still be published in the consultation report.	☐

Signature:	M C Mehegan	Date:	28/09/2026

For electronic responses a typed signature is acceptable.

Housing & Regeneration

www.towerhamlets.gov.uk

FAO: Anthony McNamara

Planning and Infrastructure

West London Alliance

Ealing Council

5th Floor, Perceval House

14-16 Uxbridge Road

Ealing

W5 2HL

LBTH Response to West London Waste Plan (Regulation 19 Consultation)

Dear Waste Planning Team,

Thank you for providing the opportunity to respond to the West London Waste Plan (WLWP).

Summary

This letter is in response to the West London Waste Plan Regulation 19 Consultation and outlines the response to the proposed capacity sharing criteria shared with LBTH on the 16 June in regard to meeting unmet need in Tower Hamlets.

Tower Hamlets is a unitary waste planning authority, meaning that the borough is responsible, as far as possible, for meeting its London Plan waste apportionment targets on sites within its boundaries. Given the density of Tower Hamlets and the presence of competing land use priorities, meeting the apportionment target has been particularly challenging. As part of the evidence base work carried out for the Tower Hamlets Draft Local Plan, the borough identified a significant shortfall in managing its waste, including apportioned waste, on facilities within its boundaries. An approach was proposed to determine whether the borough's waste needs could be met within the borough and this was consulted on under Regulation 19 (2024). However,

representations received from the GLA and EA indicated that this proposed approach was not sound. As a result, further evidence was carried out within the LBTH Waste Land Availability Study to assess whether capacity on SIL and LIL sites within the borough to accommodate waste uses and support meeting the apportionment as noted in Table 9.2 of the London Plan (2021). This was consulted on alongside a revised policy via a second 'focused' Regulation 19 consultation in 2025. The findings concluded that there were no suitable or deliverable sites available to accommodate waste uses.

Accordingly, LBTH is requesting assistance from other Waste Planning Authorities to assist with meeting its London Plan Waste apportionment.

At this stage of the LBTH Local Plan, we have discussed options with other WPAs including the East London Joint Waste Planning Group (ELJWPG) and Southeast London Joint Waste Planning Group (SELJWPG) to assist with our waste management apportionment targets. At the time of writing, discussions are ongoing and LBTH are awaiting the outcome of the ELJWP Examination hearings where our request for sharing of capacity was put forward to Inspectors.

We have set out our response under the following headings:

1. Background

2. Capacity and apportionment

3. Response to WLWP Criteria for Capacity sharing requests

4. Policies

5. Conclusion

1. Background

The London Plan (at paragraph 9.8.6) expects boroughs with surplus waste management capacity to share this capacity with boroughs that are unable to meet their waste management needs within their boundaries before considering releasing sites from safeguarding. The London Plan also aims for net waste self-sufficiency for London, which recognises that while individual boroughs may not be able to meet their waste needs within their boundaries, London as a whole should be able to meet its waste management needs without needing to rely on facilities outside of the Greater London boundary.

Waste planning is also governed by legislation: the Waste Framework Directive (WFD) was incorporated into UK law via the Waste (Circular Economy) (Amendment) Regulations 2020. In addition, the Waste (England and Wales) Regulations 2011, paragraph 4 of Part 1 of Schedule 1, sets out the 'proximity principle' - the requirement

for mixed municipal waste to be disposed of or recovered in one of the nearest appropriate installations.

The Tower Hamlets draft Local Plan was submitted to the Secretary of State on 16th February 2026. As Tower Hamlets is a unitary waste planning authority, the policies in the draft plan aim to fulfil our waste planning requirements. The submission version Draft Local Plan outlines that Council will seek to manage its apportionment in part through partnership working with other London waste planning authorities with surplus capacity, as set out in the adopted London Plan (2021) Policy SI 8. An overview of the Council's evidence base supporting the Draft Local Plan is set out within Appendix 1.

2. Capacity and Apportionment

We understand that a surplus capacity after site release has been identified by 2041 as follows:

- for the management of HIC waste at 0.36 Mtpa (360,000tpa)
- for C,D & E waste at 0.37Mtpa (370,000tpa) by 2041

Following LBTH's Regulation 18 representation, we note the WLWPAs' response that only 2 of the 6 sites proposed for release at present managed apportioned waste, and their combined capacity only amounts to 18,464tpa which has been assessed to leave a surplus capacity of c0.5Mtpa (500,000tpa).

LBTH's waste capacity shortfall is set out below. Given WLPA's surplus, LBTH are requesting a transfer of this capacity from the WLWPAs.

Waste stream	**Shortfall figure (tpa)**
C&D	56,953
HIC	192,370

This shortfall takes into consideration the representations received from the GLA and Environment Agency in response to both Tower Hamlets Local Plan Regulation 19 consultations. Based on the borough's capacity figures from its own evidence and apportionment as set out in the adopted London Plan (2021), the borough has a capacity shortfall which has been identified within the Waste Data Study (2023) and Waste Study Update (2024).

3. Response to WLWP Criteria for capacity sharing requests:

As part of ongoing discussions with the WLWPAs in regard to LBTH's capacity sharing request, and in order for requests to be assessed, a list of criteria was provided to ascertain unmet waste management needs. Below is LBTH's response:

Response to WLWP Criteria for capacity sharing requests:

WLWP Proposed Criteria	How proposed LBTH approach meets proposed criteria
1. The provision of robust evidence that demonstrates the predicted quantum of unmet need by waste type (HIC, C&D and hazardous) and capacity type in the source WPA(s). This should be demonstrated using the same methodology as used to calculate waste capacity in the New WLWP.	The submitted draft LBTH Local Plan is supported by a Waste Topic Paper (2026)[1]. Chapter 8 of the topic paper identifies a shortfall of **56,953tpa for C&D waste** and **192,370tpa for HIC waste.** The shortfall figure for C&D waste is calculated by taking the C&D waste arisings (as determined in the Waste Study Update (2024)): 127,961tpa, multiplying it by 0.95 to recognise the London Plan's recycling and recovery target, and subtracting the capacity available from safeguarded sites that handle C&D waste: 64,610tpa. The shortfall figure for HIC waste is calculated by taking the borough's London Plan apportionment: 207,000tpa by 2041, subtracting the capacity from safeguarded waste sites: 2000tpa (capacity of the Northumberland Wharf Transfer Station[2], and subtracting capacity that is provided by exempt sites: 12,630tpa. The waste capacity of the Northumberland Wharf Transfer Station was removed from the borough's waste management capacity due to objections raised by the GLA and EA on the basis that the site only has a permit for transfer activities and not processing of waste. It should be noted that the recently published Draft London Plan (which currently carries very limited weight) has proposed to include Waste Transfer Stations within borough's apportionment targets. Therefore, we anticipate that LBTH's identified shortfall in waste capacity may be subject to change.
2. In addition, the provision of relevant information including: a. assessed capacity at existing waste sites	It is worth noting in the WLWP criteria that London Plan policy SI8 part A(3) notes that '*the waste management capacity of existing sites should be* ***'optimised'*** rather than maximised.

[1] TPS08_Waste Topic Paper (2026).pdf | Powered by Box
[2] RWE02_Waste Data Study (2023).pdf | Powered by Box

<table>
<tr>
<td>located in the source WPA and how policy included in the source WPA's Local Plan promotes proposals to maximise said capacity (as per London Plan Policy SI 8 A.3)</td>
<td>In the draft LBTH Local Plan, policies RW1, RW2 and RW3 encourage existing sites to maximise efficiency and/or increase their capacity for waste management, and provide a framework for determining applications for new and expanded waste processing facilities. The plan also covers the need for new developments to accommodate suitable and accessible space for all types of waste including recyclables, organics, residual and bulky waste. Draft Policy RW1 specifies which existing sites in the borough are safeguarded for waste use over the plan period. The draft policy, in combination with draft policy RW2, supports proposals for enhancing and maximising capacity at these sites. The draft policy also notes that applications for non-waste uses will only be permitted through legal agreements that secure the waste capacity within suitable alternative sites. The Agent of Change principle is also applied within this policy to ensure other non-waste proposed uses do not negatively impact the function and operations of existing and safeguarded sites.

<u>Capacity of existing sites[3]:</u>

<table>
<tr><th>Site Name</th><th>Facility type</th><th>Input Waste type(s)</th><th>Maximum throughput (tonnes)</th><th>Waste Management Capacity</th></tr>
<tr><td>Northumberland Wharf Transfer Station (Cory)</td><td>Reuse and Recycling Centre (RRC) and Transfer Station</td><td>LACW/C&I</td><td>158,181</td><td>160,000</td></tr>
<tr><td>Towcester Road (Clifford Devlin)</td><td>Hazardous Waste Transfer Station</td><td>Hazardous</td><td>263</td><td>0</td></tr>
<tr><td>Ailsa Street (Site allocation)[4]</td><td>Transfer and treatment</td><td>C, D &E</td><td>n/a</td><td>23,850 – 34,450</td></tr>
<tr><td>455 Wick Lane J B Riney & Co Ltd (Former LLDC area)</td><td>Transfer Station</td><td>C, D &E</td><td>64,610</td><td>418</td></tr>
</table>
</td>
</tr>
<tr>
<td>b. that all existing waste sites (including those safeguarded</td>
<td>All safeguarded sites are listed in the draft Local Plan and under Policy RW1 are subject to appropriate release criteria through Part 4 of the draft policy. The London Borough of Tower</td>
</tr>
</table>

[3] Page 373 of CSD03_LBTH Consolidated Local Plan (2026)

[4] Ailsa Street is a safeguarded waste site but is not currently operational. Its contribution towards apportionment targets is based on average throughputs per hectare, depending on the facility/technology.

via the London Plan by virtue of being subject to Environment Agency permits) are being safeguarded subject to appropriate release criteria (as per London Plan Policy SI 8 A.2))	Hamlets is not proposing release of any waste sites in the borough. Subject to Part 4, applicants proposing to redevelop a waste site would need to demonstrate there would be no overall net loss of waste capacity across London per guidelines in the London Plan.
c. whether any waste sites have been lost due to redevelopment in the source WPA since the London Plan 2021 was adopted, and if so, how compensatory capacity has been demonstrated to be provided (as per London Plan Policy SI 9 C.)	No waste sites have been lost to redevelopment in Tower Hamlets since the London Plan was adopted in 2021.
d. an assessment of Strategic Industrial Locations, Locally Significant Industrial Sites, non-designated industrial sites, safeguarded wharves and existing waste and secondary material sites present within the WPA Plan area that may be suitable to accommodate additional capacity as per London Plan Policy SI 8 B 4) b) and any proposals promoted by the source WPA to release such land for non-industrial uses via its Local Plan	Under Chapter 6 of the Waste Data Study (2023), an assessment of SIL and LIL (LSIS) sites was undertaken to ascertain whether these sites can meet the borough's growing need for waste capacity. As noted in the report, the borough has two SIL sites: Empson Street (10.7ha) and Fish Island (South) (8.91ha). Based on findings from the 2023 Employment Land Review, all of the borough's industrial sites have extremely low vacancy rates and high rents implying a significant undersupply of land for industrial uses. The Tower Hamlets Employment Land Review (2023) (ELR) demonstrates that the borough has a significant shortfall in industrial land to meet demand over the plan period of the new Local Plan. This demand is predominantly for logistics facilities and manufacturing, and relying on this land for waste management could further reduce the borough's ability to meet that demand. The London Plan places a significant emphasis on the need for local authorities, particularly in Inner London, to adequately protect their industrial land to ensure that it can meet the logistics and other needs of Central London.

	LBTH have also carried out a Waste Land Availability Study (2026)[5] to determine whether any industrial sites in the borough are suitable and available for waste facilities. The majority of landowners either responded that their site was not available for waste uses or failed to respond entirely, indicated that they are not pursuing alternative uses. The study only identified one site where the owner (TfL) suggested that they might consider a waste use, amongst other uses, on an interim basis. Ultimately as a public sector landowner they would be driven by best value. This site is known as Moody's Wharf and is owned by TfL. They have indicated a long term aspiration to deliver a residential development on the site, in line with the site allocation, as part of their Places for London programme. TfL has indicated they are open to considering short term interim leases for a range of uses for 4-5 years. The site is only 0.37ha and would therefore be suitable for only small scale waste operations. On the basis of the landowner's timetable, the site would also not be available for waste use at the end of the plan period and therefore cannot be counted towards the borough's waste management capacity against the borough's London Plan apportionment. Given the site's uncertainty and the likelihood of a residential development in the medium term, it is not justified to include this site in the borough's waste capacity. Tower Hamlets also has two safeguarded wharves: Orchard Wharf and Northumberland Wharf. Northumberland Wharf includes a waste transfer station. There is currently an extant permission for Orchard Wharf for cement and aggregates storage and therefore the site is not considered available for waste facilities. Given the extant permission for Orchard Wharf, there has been no assessment for further waste capacity given the unavailability of the site. The waste management capacity for the Northumberland Wharf site is noted under criterion 2a of this table.
e. whether any planning applications that would increase waste capacity in the source WPA area have been refused, and if so the reasons for that refusal	According to both the Waste Data Study (2023) and the Waste Data Update (2024), there have been no refused waste applications in the borough. A general search on the borough's planning register for planning applications since 2017 brought up no relevant records for proposals for new waste sites or expansion of existing sites. A further detailed search was carried out with locational data of all current waste sites, SIL and LSIS to

[5] RWE04 Tower Hamlets Waste Land Availability Study (2026).pdf | Powered by Box

	confirm if any applications had been put forward. No relevant records were brought up during this exercise.
f. demonstrating that all options have been explored to identify suitable locations to accommodate additional capacity within the source WPA(s) area (consistent with national policy[6]and the London Plan Policy SI 8) and in any other London WPA Plan areas with which a demonstrable relationship exists, to meet the unmet needs. This should include the results of any Call for Sites exercise and how any decisions not to allocate land that may meet the unmet need for which capacity is being sought, were reached	LBTH carried out a call for sites between 6 July 2022 to 19 August 2022. No potential waste sites were submitted as part of this process. The Waste Study Update (2024) also carried out a search for locations within SIL and LIL sites in the borough that could come forward for waste uses in the future. Further to this, LBTH carried out a Waste Land Availability Study (2026) to determine if waste uses could be accommodated in industrial locations. The majority of landowners either responded that their site was not available for waste uses or failed to respond entirely, indicated that they are not pursuing alternative uses. The study only identified one site where the owner (TfL) suggested that they might consider a waste use, amongst other uses. Ultimately as a public sector landowner they would be driven by best value. This site is known as Moody's Wharf and is owned by TfL. They have indicated a long term aspiration to deliver a residential development on the site, in line with the site allocation, as part of their Places for London programme. TfL has indicated they are open to considering short term interim leases for a range of uses for 4-5 years. The site is only 0.37ha and would therefore be suitable for only small scale waste operations. On the basis of the landowner's timetable, the site would also not be available for waste use at the end of the plan period and therefore cannot be counted towards the borough's waste management capacity against the borough's London Plan apportionment. Given the site's uncertainty and the likelihood of a residential development in the medium term, it is not justified to include this site in the borough's waste capacity.
3. The existence of historic/existing significant flows of waste and the future availability of receiving capacity through which the unmet need identified may be met between your authority area and the WLWP area. To include comparisons with any other London WPA(s)	According to the Waste Data Interrogator (2024), some waste is exported from LBTH waste sites to waste sites in LB Brent, LB Ealing and LB Hillingdon. In total, 657 tonnes of C&D waste is exported via transfer and treatment facilities. As detailed within in the LBTH Waste Topic Paper (2026), LBTH is engaged in ongoing discussions with the ELJWPG to ascertain whether the group is able to accommodate LBTH's shortfalls in capacity for both HIC and C&D waste. Despite the evidenced surplus in capacity, the ELJWPG have not confirmed post submission of the Plan and during the EiP hearings whether they would be able to accommodate LBTH's capacity sharing request for the identified shortfall.

[6] In particular see sections 4 and 5 of National Planning Policy for Waste (October 2014) & Para 28 NPPF (December 2024)

with which your authority area has an established relationship and if a request to share capacity has been made to that WPA and if so, the outcome and basis of the WPA's response.	LBTH are currently awaiting the main modifications stage for the draft ELJWP – we have provided comments on proposed draft modifications which are available on the ELJWP examination website[7] but the formal consultation has not yet commenced. Should the Inspectors examining the ELJWP conclude that the Plan is unsound and determine that LBTH's request should instead be accommodated in full or in part within the ELJWP, the request for assistance from the WLWA's would be adjusted accordingly. LBTH have also engaged with the SELJWPG given existing flows to LB Bexley via Northumberland Wharf Transfer Station. A SoCG has also been set out with the group which maintains that the group will only consider accepting capacity sharing requests once the draft London Plan apportionment targets were known and local evidence on capacity has been updated.

Direction of Travel

It should be noted that per the Draft London Plan, the proposed Tower Hamlet's apportionment is **1.9%,** indicating a slight reduction from the current London Plan of London's total waste to be managed in borough. In the adopted London Plan **Tower Hamlet's apportionment is 2.4% of London's total waste to be managed in borough.** The 2021 figure lists Tower Hamlet's arisings as 195,000 tonnes and increases to 207,000 tonnes by 2041. The 2024 figure lists Tower Hamlets' arisings at a lower level as 157,000 tones increasing to 201,000 tonnes by 2050. With the newly proposed inclusion of 50% of waste managed at Waste Transfer Stations to help meet apportionment targets, we anticipate changes to LBTH's identified HIC shortfall.

[7] rep-5-lbth-comments-on-proposed-modifications.pdf

4. Policies

Tower Hamlets supports the scope and objectives of the policies set out in the WLWP, with the recommendations set out below for particular draft policies, LBTH considers the plan will ensure that the policies demonstrate accordance with the tests of soundness per the NPPF (2024), as it is understood the intention is for the plan to be examined as a plan under the legacy system.

Policy WLWP 1: Safeguarding Existing Waste Sites

This policy demonstrates consistency with national policy in particular part A2 of Policy SI8 in the London Plan which requires existing waste management sites to be safeguarded. This also aligns with the approach taken in the LBTH Draft Plan which supports development of waste uses on existing sites.

To ensure the plan is aligned with national policy and positively prepared in relation to capacity sharing, including the approach to meeting outstanding capacity-sharing requests, this should be reflected directly in both the policy wording and the purpose through the addition of a new section. This ensures that sufficient capacity remains to address any capacity sharing agreements with other WPAs. The Plan has identified there is surplus capacity for HIC waste. Whilst the Plan recognises providing for unmet needs from elsewhere in London under paragraphs 7.8 and 7.9, in order to ensure compliance with the NPPF (2024), in particular, NPPF 11(b) provides that strategic policies should, as a minimum, provide for "any needs that cannot be met within neighbouring areas" unless the stated exceptions apply.

We recommend that the capacity sharing request criteria that have been circulated to boroughs with an identified shortfall are included within the Plan itself. This will demonstrate compliance with London Plan paragraph 9.8.6 and will ensure that there is a consistent published approach to the consideration of capacity sharing requests.

There are a number of additional areas within WLWP 1 and the supporting text which are inconsistent with the London Plan and should be amended for clarity and consistency:

WLWP 1: Safeguarding Existing Waste Sites	**LBTH response**
Paragraph 8.5: *The London Plan 2021 allows for the redevelopment of existing waste sites for non-waste uses providing an equivalent amount of replacement (or*	Paragraph 8.5 requires rewording to align with the intent in the London Plan paragraph 9.9.3 and to avoid misinterpretation. It must be made clearer that sites ***can*** be released only if capacity

compensatory) capacity is provided. There is also a provision in the London Plan that allows for site release without replacement capacity being provided where it is demonstrated there is already sufficient capacity to allow the London Plan apportionments to be met and the capacity that would be lost is not required to ensure net self-sufficiency is met. This is based on capacity increases at waste sites being implemented over the Plan period, which in turn is based on the assumption that the capacity provided by existing waste sites across London is insufficient to meet the London Plan objectives and apportionments.	increases are implemented across existing sites. It does not '*allow*' for site release but provides a potential route for justifying release which is heavily dependent on the provision of compensatory capacity at or above the same level of the waste hierarchy and consideration of the impact of release on London's ability to manage its waste.
Paragraph 8.6: *Where compensatory capacity is required, the London Plan 2021 states that the quantum should be based on the peak recorded input to the site in question over the most recent five years for which data is available. If such data is unavailable, an appropriate assessment of potential capacity may need to be made. The Environment Agency's Waste Data Interrogator dataset is recommended for the identification of peak input to sites that have been operational during the five year period to which data relates.*	Paragraph 8.6 should reference paragraph 9.9.2 of the London Plan which sets out how compensatory capacity is to be delivered, as required. The current text does not directly align with the guidance set out in the London Plan which refers to maximum throughput rather than peak input.
Paragraph 8.8: … *The London Plan definition does not include sites with a waste use that has become lawful through the passage of time under planning legislation or where the waste use is ancillary to a wider lawful use. The lawful status of such sites can be confirmed by issue of a Certificate of Lawful Existing Use or Development (CLEUD). For the purposes of this Plan, existing waste sites are defined as land that meet at least one of the following conditions:* • *is subject to an extant planning consent for waste use* • *where a Certificate of Lawful Existing Use or Development (CLEUD) for a waste use has been granted*	Paragraph 8.8 refers to the London Plan definition of waste sites but does not directly reference the relevant paragraph (9.9.1). it also does not provide any justification for the expanding the definition of waste sites beyond those covered by the London Plan, and this should be clearly set out in the supporting text.

• *is used for a waste use that has become lawful through the passage of time under planning legislation* • *where the waste use is ancillary to a wider lawful use*	
Paragraph 8.9: *Such sites may also benefit from an Environmental Permit issued by the Environment Agency for waste-related operations, but such a permit's existence is not considered determinative on the matter of safeguarding as that is properly a land-use planning rather than pollution control matter. Therefore, sites that are only subject to an Environmental Permit for waste use, and do not have a planning permission, a CLEUD, or are not otherwise considered lawful under planning legislation, are not included within this definition. An assessment of the capacity for each safeguarded site in west London was undertaken and included in the Waste Capacity Assessment*.	Justification should also be provided in Paragraph 8.9 for the exclusion of sites that are only subject to an Environmental Agency permit for waste uses from the definition of waste sites. This is inconsistent with the definition set out in London Plan Paragraph 9.9.1. We recommend aligning the definitions in Paragraphs 8.8 and 8.9 with the London Plan to ensure that the plan is consistent with the objectives of the London Plan.
Paragraphs 8.12, 8.13 and 8.16.	'Replacement capacity' should be amended to 'compensatory capacity' in accordance with London Plan Policy SI9 (Part C).
Paragraph 8.13: *Replacement capacity must be at least equivalent in terms of:* • *the type of waste managed (HIC (LACW & C&I), C, D & E, Hazardous)* • *its position on the waste hierarchy (a lower throughput for management further up the hierarchy may be acceptable).*	London Plan Policy SI9 (Part C) clearly states that compensatory capacity "***must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost.***" It does not state that a lower throughput may be acceptable where the compensatory capacity is at a higher level of the waste hierarchy, as suggested in the second bullet of Paragraph 8.13.
Paragraph 8.18: *Safeguarded waste sites are those waste sites whose capacity has been counted as contributing towards meeting the above need as listed in Appendix 2, unless they have been released from safeguarding (see Appendix 6). Safeguarding extends to other sites which meet the definition post adoption of*	The final sentence should clearly state which definition of waste site is being referred to (either the London Plan definition or the alternative definition proposed in the draft WLWP, subject to this being appropriately justified).

the plan. ***Following adoption of this Plan, updates on the list of waste sites that meet the definition will be provided in Authority Monitoring Reports produced by the LPAs.***	
Proposed policy amendments	
B. Waste sites are those subject to planning consent or CLEUDs for a waste use, or deemed lawful in planning terms (those listed in Appendix 2 and meeting the above definition post-adoption of this Plan).	WLWP1 Part B: As set out above in relation to paragraphs 8.8 and 8.9, this should either be clearly justified or should be amended to reflect the definition set out in the London Plan.
C. Sites subject to time limited consents will only be safeguarded up to the date at which the consent permitting the waste use expires.	This has not been appropriately justified and is not in conformity with London Plan Policy SI 9 (Part A) which requires existing waste sites to be retained in waste use.
D. Proposals to redevelop safeguarded waste sites for waste uses will be supported where this contributes to the optimisation of waste management capacity of the Plan area. The capacity of the redeveloped site must not be less than the assessed capacity of the existing site, as set out in Appendix 2 (or in any subsequent assessment), unless it will demonstrably result in waste being managed further up the waste hierarchy and the site is being optimised for this purpose.	This allows proposals for redevelopment of existing waste sites to provide a lower capacity where the redevelopment would result in waste being managed further up the waste hierarchy. This has not been appropriately justified and potentially conflicts with London Plan Policy SI8 which promotes capacity increases at existing waste sites, and should be amended to bring into alignment with the London Plan.
F. At the time of an application for re-development of a safeguarded waste site for non-waste uses, the replacement capacity requirement will be determined, with the assessed capacity of the existing site as set out in Appendix 2 (or in any subsequent assessment) being the starting point.	London Plan paragraph 9.9.2 is clear that the release of safeguarded waste sites should be plan-led rather than ad hoc. Part F sets out a framework for the ad hoc release of safeguarded sites via the development management process and is therefore not in conformity with the London Plan.

Policy WLWP 2: Provision of Additional Waste Management Capacity

To note, Policy WLWP 2 is missing from the list of contents for the Plan.

The policy demonstrates consistency with national policy and aligns with objectives set out in London Plan policy SI8 Part B4 in relation to suitable locations to manage borough waste apportionments.

Policy WLWP 6: Circular Economy and Resource Efficiency

This policy demonstrates consistency with London Plan policy SI7 and is justified in its approach. The policy also aligns with the approach and objectives of policy CG4 in the draft LBTH Local Plan.

5. Conclusion

Tower Hamlets welcomes the opportunity to continue to work closely with other London boroughs on waste management matters. In accordance with London Plan Policy SI8, Tower Hamlets would welcome a transfer of **192,370tpa** of HIC waste capacity and a transfer of **56,935tpa** of C,D&E waste capacity. This would contribute to the effective delivery of London-wide waste planning objectives, support the strategic redistribution of waste management capacity across borough boundaries, and help ensure that the West London Plan provides a positively prepared and effective framework for addressing waste management needs across the wider sub-region through a partnership approach.

As both authorities progress their respective plan-making processes, continued engagement on waste capacity sharing will be important to support the effective implementation of London Plan Policy SI8 and the achievement of London's strategic waste objectives. Tower Hamlets would welcome ongoing discussions with the West London Waste Plan Authorities to identify mutually beneficial capacity-sharing arrangements that contribute towards net self-sufficiency across London, provide greater certainty regarding the delivery of waste apportionment requirements, and support a sound, effective and positively prepared West London Waste Plan.

Yours sincerely,

Jasvir Mann

[redacted]

[redacted]

Appendix 1: Overview of LB Tower Hamlets Draft Local Plan Evidence Base

Waste Data Study (2023)

Tower Hamlets carried out a Waste Data Study (July 2023) to inform its Regulation 18 Draft Local Plan in 2023. This study demonstrated that the borough faced a shortfall of 192,370 tonnes per annum (tpa) by 2041. Given the lack of available locations in the borough for new waste facilities, the Waste Data Study recommended that Tower Hamlets approach neighbouring waste authorities to request that some of their excess capacity be transferred to Tower Hamlets to help meet its apportionment, as set out in the adopted London Plan (2021).

Waste Study Update (2024)

Following consultation on the Tower Hamlets' Draft Local Plan (Regulation 18), Tower Hamlets commissioned a Waste Study Update (May 2024) to include a more comprehensive search for potential waste sites in the borough in order to test a scenario in which no neighbouring borough was able to assist Tower Hamlets in meeting its need. That search identified additional capacity at Northumberland Wharf and included Onsite Segregation Facilities (OSFs) as part of the waste capacity for Tower Hamlets. OSFs were included as part of scenario testing to see if it was possible for Tower Hamlets to meet its apportionment requirements within the borough if other boroughs did not have spare capacity. The inclusion of OSFs as part of a borough's waste capacity is untested – no local authority is known to have used OSFs to meet its waste planning requirements. Both the GLA and EA raised concerns regarding this approach and was deemed to be unsound.

The Waste Study Update also assessed capacity for the management of Construction and Demolition Waste (C&D), and identified a shortfall of 56,953tpa between the need in the borough to 2041 and the capacity of existing operational C&D processing facilities in the borough.

Waste Land Availability Study (2026)

The LBTH Waste Land Availability Study was carried out by Iceni to look into whether designated industrial sites (Strategic Industrial Locations and Locally Significant Industrial Sites) could accommodate waste uses in the borough. The study found no suitable or deliverable sites within the borough boundary to help support the borough's apportionment. A copy of the report has been submitted alongside this representation.

The Tower Hamlets Employment Land Review (2023) demonstrates that the borough has a significant shortfall in industrial land to meet demand over the plan period of the new Local Plan. This demand is predominantly for logistics facilities and manufacturing, and relying on this land for waste management could further reduce the borough's ability to meet that demand. The London Plan places a significant emphasis

on the need for local authorities, particularly in Inner London, to adequately protect their industrial land to ensure that it can meet the logistics and other needs of Central London more widely. LBTH identifying areas of search in order to meet its own waste planning needs presents an approach that is not deliverable in practice. There would not be a realistic prospect of vacant sites in the borough coming forward for waste uses, particularly since there is significant over supply directly adjacent within LB Newham, and given the high demand for logistics within inner London and the limited supply. There have been no applications for waste uses anywhere in the borough since 2017. Where other waste planning authorities have excess capacity on existing safeguarded waste sites, it would be aligned with the London Plan for these to be used for waste purposes ahead of SIL land which is currently in industrial use within LB Tower Hamlets.

Consultation on the Proposed Submission West London Waste Plan

Response forms from London Parks and Gardens

Part A: Personal Details		
	1. Personal Details *	**2. Agent's Details (if applicable)**
Title		
First name	Philip	
Last name	Barnes	
Job title (where relevant)	[redacted]	
Organisation (where relevant)	London Historic Parks & Gardens Trust	
Address	[redacted]	
Postcode	[redacted]	
Telephone	[redacted]	
E-mail address	[redacted]	

*If an agent is appointed, please provide the full contact details of the agent plus the person (title, name) or organisation they are acting for.

Part A: About You...	
3. Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	
[redacted]	
[redacted]	
[redacted]	
Other - please state what your specific interest in west London might be.	London Parks & Gardens works to protect, preserve and celebrate London's historic parks, gardens and urban green spaces. It is the county Gardens Trust for Greater London and draws on its London-wide membership for local knowledge and expertise. https://londongardenstrust.org/

Data protection

We will ensure that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure.

The Privacy Statement is published on the webpage https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

All responses will be held by the London Borough of Ealing. Responses will not be treated as confidential and will be published on its website and in any subsequent statements, attributed by name and/or organisation; however, personal details like address, phone number or email address will be removed.

If you submit comments, your consultation responses and personal data will be passed to the Planning Inspectorate and a Programme Officer. The Programme Officer manages the procedural and administrative aspects of the examination. The Programme Officer will contact you using the personal information you have provided if you have indicated in the response form your wish to engage in the Examination.

Part B: Your Detailed Response			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	
		Paragraph number(s)	
		Policy no./name	WLWP 4(B)(3)(i)
		Site no./ name (see Appendices to the Plan)	
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		

5. Do you consider the West London Waste Plan is:		
5.1 Legally compliant	Yes ☐	No ☐
5.2 Sound	Yes ☐	No ☒

Further information on these terms is included within the guidance note and answers to Frequently Asked Questions available on the website at https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.

The policy fails the test of soundness on the grounds of not being effective and with not being consistent with national policy.

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Our objection to policy WLWP 4 (B)(3)(i) could be resolved by

- adding to the impacts to be avoided:

"harm to the significance of designated and non-designated heritage assets, including registered and locally listed historic parks, gardens and designed landscapes, and their settings; harm to landscape and townscape character; and loss of or harm to open space."

- Inserting a new clause in Policy WLWP 4:

"Where a proposal would affect a heritage asset or its setting, require a heritage statement proportionate to the asset's significance, informed by the Greater London Historic Environment Record and the London Parks & Gardens Inventory."

Part B– Additional Responses Continued			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	
		Paragraph number(s)	8.29
		Policy no./name	WLWP 2(C)(6)
		Site no./ name (see Appendices to the Plan)	
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		

5. Do you consider the West London Waste Plan is:		
5.1 Legally compliant	Yes ☐	No ☐
5.2 Sound	Yes ☐	No ☒

Further information on these terms is included within the guidance note and answers to Frequently Asked Questions available on the website at https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.

The policy fails the test of soundness on the grounds of not being effective

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Our objection to Policy WLWP 2(C)(6) could be resolved by

- Inserting the following three matters after "the environment or local amenity", and add them to the list of impacts in para 8.29

Add to the impacts to be avoided:

- harm to the significance of designated and non-designated heritage assets, including registered and locally listed historic parks, gardens and designed landscapes, and their settings;
- harm to landscape and townscape character; and
- loss of or harm to open space.

Part B– Additional Responses Continued			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	
		Paragraph number(s)	8.48
		Policy no./name	
		Site no./ name (see Appendices to the Plan)	
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		
5. Do you consider the West London Waste Plan is:			

5.1 Legally compliant	Yes ☐	No ☒
5.2 Sound	Yes ☐	No ☒

Further information on these terms is included within the guidance note and answers to Frequently Asked Questions available on the website at https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.

The policy fails the test of soundness on the grounds of not being consistent with national policy

Para 8.48 requires proposals to conserve and avoid harm to heritage assets "unless strong justification is provided" — which is not the national test, and whose list of asset types omits registered parks and gardens, although the Plan's own glossary includes them.

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Replace "unless strong justification is provided" with the national tests — great weight to conservation of designated assets, clear and convincing justification, the substantial / less than substantial balance, and a balanced judgement for non-designated assets — and add registered parks and gardens to the list of asset types.

Part B– Additional Responses Continued			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	
		Paragraph number(s)	
		Policy no./name	WLWP 5(C)
		Site no./ name (see Appendices to the Plan)	
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		
5. Do you consider the West London Waste Plan is:			
5.1 Legally compliant		Yes ☐	No ☐
5.2 Sound		Yes ☐	No ☒
6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.			

The policy fails the test of soundness on the grounds of not being effective
7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
Policy WLWP 5 should require final landform and after-uses to conserve the significance and setting of heritage assets, rather than merely take account of the historic environment. This is the clause governing permanent deposit of inert waste to land.

Part B– Additional Responses Continued			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	
		Paragraph number(s)	
		Policy no./name	WLWP 1
		Site no./ name (see Appendices to the Plan)	
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		
5. Do you consider the West London Waste Plan is:			
5.1 Legally compliant		Yes ☐	No ☐
5.2 Sound		Yes ☐	No ☒
6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.			

The policy fails the test of soundness on the grounds of not being justified
7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
Policy WLWP 1, insert new clause Safeguarding boundaries to be drawn to the operational footprint of the lawful waste use, excluding land forming part of a registered park and garden, a conservation area, Metropolitan Open Land or an Inventory site, save where the waste use is demonstrably lawful on that land.

Part B– Additional Responses Continued			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
If you have more detailed comments to make on what the Plan should contain, please download the form, Part B– Additional Responses Continued, or print additional versions of this form, being clear about page numbers, paragraphs or infographics to which they apply, and append to your response form.			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	
		Paragraph number(s)	
		Policy no./name	WLWP 1(I), Agent of Change
		Site no./ name (see Appendices to the Plan)	
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		
5. Do you consider the West London Waste Plan is:			

5.1 Legally compliant	Yes ☐	No ☐
5.2 Sound	Yes ☐	No ☒

Further information on these terms is included within the guidance note and answers to Frequently Asked Questions available on the website at https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.

The policy fails the test of soundness on the grounds of not being effective

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy WLWP 1(I), Agent of Change:

Add a proviso that the clause shall not be applied so as to restrict the restoration, management, public use or enhancement of a heritage asset, historic designed landscape or public open space adjoining a safeguarded site.

Part B– Additional Responses Continued			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
If you have more detailed comments to make on what the Plan should contain, please download the form, Part B– Additional Responses Continued, or print additional versions of this form, being clear about page numbers, paragraphs or infographics to which they apply, and append to your response form.			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	
		Paragraph number(s)	
		Policy no./name	Strategic Objective 4
		Site no./ name (see Appendices to the Plan)	
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		
5. Do you consider the West London Waste Plan is:			

5.1 Legally compliant	Yes ☐	No ☐
5.2 Sound	Yes ☐	No ☒

Further information on these terms is included within the guidance note and answers to Frequently Asked Questions available on the website at https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.

The policy fails the test of soundness on the grounds of not being effective

Strategic Objective 4 is measured by two indicators only: low-emission vehicle measures in new permissions, and Category 1 or 2 pollution and nuisance incidents. Harm to the setting of a registered park would not be recorded.

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Our objection could be resolved by inserting: "conserve and, where opportunities arise, enhance designated and non-designated heritage assets, including registered and locally listed historic parks, gardens and designed landscapes, their settings, and public open space."

Part B– Additional Responses Continued			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Site no./ name (see Appendices to the Plan)	
		Maps	
		Tables	Appendix 1, monitoring
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		
5. Do you consider the West London Waste Plan is:			
5.1 Legally compliant		Yes ☐	No ☐
5.2 Sound		Yes ☐	No ☒
6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.			

The plan fails the test of soundness on the grounds of not being effective

Appendix 1, the monitoring framework, contains no heritage, historic environment, landscape, open space or green infrastructure indicator.

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Add an indicator:

- number of permissions for waste-related development affecting a designated or non-designated heritage asset, its setting, or open space, and whether harm was identified and justified. Target: no unjustified harm.

Part B– Additional Responses Continued			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Site no./ name (see Appendices to the Plan)	R02 Kew Gardens Compost (Richmond)
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		

5. Do you consider the West London Waste Plan is:		
5.1 Legally compliant	Yes ☐	No ☒
5.2 Sound	Yes ☐	No ☒

6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to <u>support</u> the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.

The plan fails the test of soundness on the grounds of not being legally compliant and deliverable.

Failure to consider heritage impacts on sites of heritage interest.

Royal Botanic Gardens, Kew is a Grade I registered landscape and, since 2003, a World Heritage Site. Neither designation is acknowledged anywhere in the Plan.

Neither the Plan nor the IIA contains any heritage screening of the 66 safeguarded sites: the IIA appraised policies and two potential site options, not the safeguarded network. Nobody, including the authorities, currently knows how many historic green spaces these designations affect, and London Parks & Gardens requests such a screening be carried out before submission or adoption of the plan.

Proposal results in statutory safeguarding applied inside a Grade I registered landscape and World Heritage Site (legally compliant?)

Appendix 2 itself does not confirm, at 5,000 tpa against a recorded five-year peak of 1,024 tpa. WLWP 1(D) would support redevelopment for waste use; 1(I) would subordinate management of the landscape to the compost yard.

See **London Parks & Gardens Inventory**

Royal Botanic Gardens, Kew (RIC068)

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete R02 from Appendices 2 and 3. Failing that: record the Grade I and World Heritage Site designations, limit the boundary to the existing compound, disapply Policy WLWP 1 clauses 1(D) and 1(I), and record the use as ancillary to management of the Gardens.

Part B– Additional Responses Continued			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Site no./ name (see Appendices to the Plan)	B01 and B02 Twyford Abbey Road (Brent / OPDC)
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		
5. Do you consider the West London Waste Plan is:			
5.1 Legally compliant		Yes ☐	No ☐
5.2 Sound		Yes ☐	No ☒
6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.			

The plan fails the test of soundness on the grounds of not being effective and not being consistent with national policy.

Failure to consider heritage impacts on adjacent sites of heritage interest.

Neither the Plan nor the IIA contains any heritage screening of the 66 safeguarded sites: the IIA appraised policies and two potential site options, not the safeguarded network. Nobody, including the authorities, currently knows how many historic green spaces these designations affect, and London Parks & Gardens requests such a screening be carried out before submission or adoption of the plan.

Twyford Abbey is a Grade II listed house of 1807-09 with walled garden, pleasure grounds and park, 5.4 ha, SNCI and TPO, now returning to use. B01 is proposed for permanent safeguarding on its frontage road with no heritage criterion, and Agent of Change under 1(I) could be used against restoration or public opening of the grounds. B02 is released once Collet Way completes.

See **London Parks & Gardens Inventory**

Twyford Abbey (EAL053)

St Mary's Churchyard, West Twyford (EAL048)

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Implement our recommended changes to WLWP 4 and WLWP 1(I);

Insert an Appendix 2 annotation recording proximity to EAL053 so intensification under 1(D) is assessed against the setting.

Support the release of B02.

Part B– Additional Responses Continued			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Site no./ name (see Appendices to the Plan)	HI18 High View Farm, and HI13, HI15, HI21 (Hillingdon)
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		

5. Do you consider the West London Waste Plan is:		
5.1 Legally compliant	Yes ☐	No ☒
5.2 Sound	Yes ☐	No ☒

6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to <u>support</u> the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.

Failure to consider heritage impacts on adjacent sites of heritage interest.

Neither the Plan nor the IIA contains any heritage screening of the 66 safeguarded sites: the IIA appraised policies and two potential site options, not the safeguarded network. Nobody, including the authorities, currently knows how many historic green spaces these designations affect, and London Parks & Gardens requests such a screening be carried out before submission or adoption of the plan.

Harefield Place is on the National Heritage List

Old Park Wood is 24 ha of ancient woodland and SSSI, formerly Harefield Park, its Hill End Road entrance retaining remnants of the former gates and driveway. The IIA found negative effects on the historic environment at High View Farm from potential impacts on the setting of historic assets; the site is safeguarded at 119,790 tpa with an extension proposed through the Call for Sites, and no policy criterion controls that effect.

See **London Parks & Gardens Inventory** Old Park Wood (HIL035)

Harefield Village Green (HIL023)

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Implement our recommended changes to WLWP 4;

The IIA's site-level finding should be carried into an annotation in Appendix 2 so it informs any future application.

Part B– Additional Responses Continued			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Site no./ name (see Appendices to the Plan)	HO05, HO07, HO14 Brentford (Hounslow)
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		
5. Do you consider the West London Waste Plan is:			
5.1 Legally compliant		Yes ☐	No ☐
5.2 Sound		Yes ☐	No ☒
6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to <u>support</u> the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.			

Failure to consider heritage impacts on adjacent sites of heritage interest.

Neither the Plan nor the IIA contains any heritage screening of the 66 safeguarded sites: the IIA appraised policies and two potential site options, not the safeguarded network. Nobody, including the authorities, currently knows how many historic green spaces these designations affect, and London Parks & Gardens requests such a screening be carried out before submission or adoption of the plan.

See **London Parks & Gardens Inventory**

Carville Hall Park North (HOU012)

Carville Hall Park South (HOU013)

Boston Manor Park (HOU010)

Syon Park (HOU054)

Gunnersbury Park (HOU027)

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Three safeguarded sites between the two halves of Carville Hall Park and close to three registered landscapes. HO07 produces recycled aggregate from construction waste and incinerator bottom ash brought in from outside London; HO14 operates on a 1993 permission.

Could be resolved by our proposed WLWP 4 modification, with a landscape and visual appraisal and heritage statement required for any intensification under WLWP 1(D), given the concentration of registered landscapes here.

Part B– Additional Responses Continued			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Site no./ name (see Appendices to the Plan)	HO2 Western International Market (Hounslow)
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		
5. Do you consider the West London Waste Plan is:			
5.1 Legally compliant		Yes ☐	No ☒
5.2 Sound		Yes ☐	No ☒
6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.			

Failure to consider heritage impacts on adjacent sites of heritage interest.

Neither the Plan nor the IIA contains any heritage screening of the 66 safeguarded sites: the IIA appraised policies and two potential site options, not the safeguarded network. Nobody, including the authorities, currently knows how many historic green spaces these designations affect, and London Parks & Gardens requests such a screening be carried out before submission or adoption of the plan.

Osterley Park (HOU038)

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

One of only two sites consented for permanent deposit of inert waste to land, in the Southall Lane belt near a Grade II* National Trust landscape. This is the capacity Policy WLWP 5 governs.

Our objection could be resolved by strengthening WLWP 5(C) so that final landform must conserve the significance and setting of heritage assets, not merely take account of the historic environment.

Part B– Additional Responses Continued			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Site no./ name (see Appendices to the Plan)	HA01 Forward Drive and HA02 151 Pinner View (Harrow)
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		
5. Do you consider the West London Waste Plan is:			
5.1 Legally compliant		Yes ☐	No ☐
5.2 Sound		Yes ☐	No ☒
6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.			

Failure to consider heritage impacts on adjacent sites of heritage interest.

Neither the Plan nor the IIA contains any heritage screening of the 66 safeguarded sites: the IIA appraised policies and two potential site options, not the safeguarded network. Nobody, including the authorities, currently knows how many historic green spaces these designations affect, and London Parks & Gardens requests such a screening be carried out before submission or adoption of the plan.

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Both sites sit against Headstone Manor: HA01 runs off Headstone Drive, HA02 is on the road bounding the recreation ground and the moated manor site. HA02 handles hazardous waste.

- See our proposed modification to WLWP 4.
- The site plan boundary does not seem to be the same as on the Appendix 3 maps.

Part B– Additional Responses Continued			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Site no./ name (see Appendices to the Plan)	R01 Townmead and R03 Langhorn Drive (Richmond)
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		
5. Do you consider the West London Waste Plan is:			
5.1 Legally compliant		Yes ☐	No ☐
5.2 Sound		Yes ☐	No ☒
6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to <u>support</u> the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.			

Failure to consider heritage impacts on adjacent sites of heritage interest.

Neither the Plan nor the IIA contains any heritage screening of the 66 safeguarded sites: the IIA appraised policies and two potential site options, not the safeguarded network. Nobody, including the authorities, currently knows how many historic green spaces these designations affect, and London Parks & Gardens requests such a screening be carried out before submission or adoption of the plan.

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Townmead sits on the Kew riverside in the same quarter as Kew Green and the Botanic Gardens. The Appendix 3 map for Langhorn Drive shows Mereway Nature Park and the River Crane immediately south of the boundary.

Our objection could be resolved by making our proposed modification to WLWP 4, so that intensification under 1(D) is assessed against the Crane corridor and the Kew riverside.

Part B– Additional Responses Continued			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Site no./ name (see Appendices to the Plan)	HI06 and HI09 Holloway Lane (Hillingdon)
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		
5. Do you consider the West London Waste Plan is:			
5.1 Legally compliant		Yes ☐	No ☐
5.2 Sound		Yes ☐	No ☒
6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.			

Failure to consider heritage impacts on Harmondsworth village green and St Mary's churchyard

Neither the Plan nor the IIA contains any heritage screening of the 66 safeguarded sites: the IIA appraised policies and two potential site options, not the safeguarded network. Nobody, including the authorities, currently knows how many historic green spaces these designations affect, and London Parks & Gardens requests such a screening be carried out before submission or adoption of the plan.

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Both lie in the Harmondsworth area, near the Great Barn, the Grade II* parish church and the Colne Valley. Harmondsworth Quarry nearby is the second permanent inert deposit-to-land site.

Could be resolved by our proposed modification to WLWP 4 and the strengthened WLWP 5(C).

Part B– Additional Responses Continued			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Site no./ name (see Appendices to the Plan)	HO13 Fleming Way, Isleworth (Hounslow)
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		
5. Do you consider the West London Waste Plan is:			
5.1 Legally compliant		Yes ☐	No ☐
5.2 Sound		Yes ☐	No ☒
6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to <u>support</u> the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.			

Failure to consider heritage impacts on Redlees Park & Silverhall Park.

Neither the Plan nor the IIA contains any heritage screening of the 66 safeguarded sites: the IIA appraised policies and two potential site options, not the safeguarded network. Nobody, including the authorities, currently knows how many historic green spaces these designations affect, and London Parks & Gardens requests such a screening be carried out before submission or adoption of the plan.

Redlees Park (HOU040)

Silverhall Park (HOU049)

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Impacts of small hazardous and non-hazardous transfer site close to both parks of heritage interest.

Objection would be resolved by policy WLWP 4 & WLWP 5 modification.

Part B– Additional Responses Continued			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Site no./ name (see Appendices to the Plan)	McGovern Plant / Wet Waste (Hounslow) — not currently safeguarded
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		

5. Do you consider the West London Waste Plan is:		
5.1 Legally compliant	Yes ☐	No ☐
5.2 Sound	Yes ☐	No ☒

6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.

Neither the Plan nor the IIA contains any heritage screening of the 66 safeguarded sites: the IIA appraised policies and two potential site options, not the safeguarded network. Nobody, including the authorities, currently knows how many historic green spaces these designations affect, and London Parks & Gardens requests such a screening be carried out before submission or adoption of the plan.

Crane Valley Park (HOU018)

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Our concern relates to policy weaknesses already identified and illustrates need for heritage impacts to be assessed in the plan.

McGovern Plant / Wet Waste (Hounslow) was nominated through the Call for Sites. The IIA records that it adjoins a Site of Importance for Nature Conservation and lies adjacent to the River Crane. It was not allocated only because it lacks planning permission, and the authorities note it would be safeguarded if regularised.

We ask that safeguarding not follow automatically from regularisation on a site of this sensitivity, and that any future safeguarding be assessed against the Crane corridor.

Part B– Additional Responses Continued			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Site no./ name (see Appendices to the Plan)	
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☒	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		
5. Do you consider the West London Waste Plan is:			
5.1 Legally compliant		Yes ☐	No ☒
5.2 Sound		Yes ☐	No ☒
Further information on these terms is included within the guidance note and answers to Frequently Asked Questions available on the website at https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation			
6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.			

Policies are inconsistent with the recommendations of the Integrated Impact Assessment and therefore fail to safeguard the historic assets of West London's parks and open spaces.

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Integrated Impact Assessment

The IIA consultants record that the vision and most objectives have a negligible effect on the historic environment because there are no specific references to it; they score the Plan overall as an uncertain mix of positive and negative on both historic environment and open spaces; and identify the remedy at scoping as strengthening design requirements to minimise impacts on the historic environment. That strengthening does not appear in the Plan. A mitigation measure recommended by the appraisal and not carried through is a direct point on effectiveness.

Policies WLWP 4(B)(3)(i) and WLWP 2(C)(6) appear to contain the criterion that decision-makers will apply to proposals. At this stage, modifications to the list of impacts could resolve the issue.

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	
☐ **No**, I do not wish to participate in hearing session(s)	☐ **Yes**, I wish to participate in hearing session(s)
Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.	
9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: ***Please note*** *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*	
London Parks &Gardens are willing to help the Inspector, as appropriate.	
10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the West London Waste Plan.	
If you do not wish to be notified of future updates on the West London Waste Plan, then please tick this box, complete Part A: Personal Details of this form and return it to us. Note your name, business (if entered) and response will still be published in the consultation report.	☐

Signature:	Philip Barnes	Date:	22/09/2026
For electronic responses a typed signature is acceptable.			

wlwasteplan

From: Marie Canny [redacted]
Sent: 28 September 2026 22:13
To: wlwasteplan
Cc: SM-MMO-Consultations (MMO)
Subject: RE: West London Waste Plan Consultation
Attachments: 20260121_LB_Richmond_Multiple_Consultations_MMO_Response.pdf

WARNING : This Message has originated from outside your organization, If you do not trust this email please either delete or follow the guidance on OneSpace.

Dear Planning Team,

MMO Marine Planning response to the Regulation 19 West London Waste Plan Consultation

Thank you for giving us the opportunity to comment on the West London Waste Plan Regulation 19 Consultation.

Specific Comments
The inspector may seek reference to the South East Marine Plan, for the reasons stated previously in our Regulation 18 response (attached, for ease), which the relevant authorities for the West London Waste Plan sits within. They may also seek reference to the requirement for decision makers, such as yourselves, to take the marine policy statement and marine plans into account under the Marine and Coastal Access Act 2009.

All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the South East Marine Plan, or the UK Marine Policy Statement (MPS) unless relevant considerations indicate otherwise. This includes local authorities developing planning documents for areas with a coastal/tidal influence. We advise that all marine plan objectives and policies are taken into consideration by local planning authorities when plan-making.

These are recommendations and we suggest that your own interpretation of the South East Marine Plan is completed. We would also recommend you consult the following references for further information: South East Marine Plan and Explore Marine Plans.

Please let me know if you have any questions regarding implementation of the marine plan.

Many thanks again for the opportunity to comment.

All the best
Marie

Marie Canny [redacted] **Marine Management Organisation**
[redacted]

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From: wlwasteplan <wlwasteplan@ealing.gov.uk>
Sent: 03 August 2026 18:05
To: [redacted]
Subject: West London Waste Plan Consultation

You don't often get email from wlwasteplan@ealing.gov.uk. Learn why this is important

Dear Stakeholder,

We are writing to inform you that the West London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames, together with the Old Oak and Park Royal Development Corporation (OPDC), are publishing the Proposed Submission version of the West London Waste Plan (WLWP) for comment.

This important document sets out the proposed planning strategy for waste management for these authorities up to 2041 and includes policies that are proposed to be used when assessing planning applications related to waste management development. It also identifies sites proposed to be safeguarded for waste use.

The WLWP aims to provide an up to date, sound and effective planning strategy for waste management in accordance with national policy, the London Plan, and local priorities. We consulted previously on a draft updated West London Waste Plan and the comments received have helped shape the Proposed Submission version. If adopted, the updated West London Waste Plan would replace the current 2015 WLWP.

Please note you may have received this notification more than once from different authorities – you only need to respond once as all responses will be collated.

This is the final opportunity to comment before the documents are submitted to the Secretary of State for Examination, the west London boroughs and OPDC invite representations on whether the Proposed Submission WLWP is 'sound' and 'legally compliant', including whether it is in general conformity with the London Plan. Please visit **haveyoursay.ealing.gov.uk/projects/wlwp-consultation** to find out more about the Plan and answers to some frequently asked questions.

How can I view and comment on the documents?

Ealing Council is hosting the consultation on their online portal, on behalf of the other planning authorities involved. You can view the Proposed Submission WLWP and its supporting documents, including the Integrated Impact Assessment and Habitats Regulations Assessment, via Ealing Council's online consultation portal: **haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation.** The Statement of Representations Procedure and Statement of Fact' can be accessed with the above link. Reference copies of the Proposed Submission WLWP are also publicly available for inspection at various libraries and offices listed on the online consultation portal - more details are in the 'Statement of Representations Procedure and Statement of Fact'.

The publication period closes on **Monday 28th September** (23:59). You are invited to provide feedback on the Proposed Submission WLWP and the supporting documents. You can submit your comments to us in writing by any of the following methods:

- Complete an online questionnaire on Ealing Council's online consultation portal using the above website.
- Email your completed response form to wlwasteplan@ealing.gov.uk. A PDF and a Word version of the form can be found at haveyoursay.ealing.gov.uk/projects/wlwp-consultation. In the Word version, you can type in your response and return it as an email attachment.
- Complete and post printed copies of the response form to the address given below. Printed copies are available at the selected locations listed on the consultation portal.
    - Post written responses to:
      Planning and Infrastructure
      West London Alliance
      Ealing Council
      5th Floor, Perceval House
      14-16 Uxbridge Road

Ealing, W5 2HL

- Email responses to: wlwasteplan@ealing.gov.uk

If you have any questions about the consultation, or need the documents in an alternative format, please contact the WLWP Project Manager, wlwasteplan@ealing.gov.uk

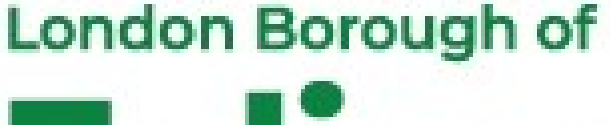
Following the completion of the publication process, all responses received will be submitted to the Government with the WLWP and other supporting documents, for examination by an independent planning inspector. Please note that your response will not be treated as confidential and any anonymous responses will not be accepted. Responses to this consultation will be published, with any personal contact details redacted in accordance with general data protection principles.

The authorities are committed to ensuring that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure. If you submit comments, your consultation responses and personal data will be passed to the Planning Inspectorate and a Programme Officer. The Privacy Statement is published on the webpage https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation. We hope that you or your organisation will continue to take an interest in the progression of the West London Waste Plan. If, however, you would prefer not to receive notifications, you can let us know.

Yours faithfully,

The West London Waste Planning Team
On behalf of the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond upon Thames and the Old Oak and Park Royal Development Corporation.





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Marine Management Organisation

[redacted]

[redacted]

www.gov.uk/mmo

Spatial Planning and Design
London Borough of Richmond upon Thames
Civic Centre
44 York Street
Twickenham TW1 3BZ

Our ref: ID 801 and 803

21/01/2026

Dear Sir/Madam,

MMO Marine Planning and Marine Licensing response to the following documents:

- Regulation 18 Draft Updated West London Waste Plan - until 5 February 2026
- Draft Affordable Housing Supplementary Planning Document – until 22 January 2026
- Draft Planning Obligations Supplementary Planning Document – until 22 January 2026

Thank you for giving us the opportunity to comment on these documents. The comments provided within this letter refer to the documents entitled above.

As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers, in the case of the Thames this extends up to Teddington lock), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.

Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the South East Marine Plan is of relevance. The plan was published for public consultation on 14th January 2020, at which point it became material for consideration. The South East Marine Plan was adopted June 2021, alongside the North East, North West, and South West. The South East Marine Plan covers the area from Landguard Point in Felixstowe to Samphire Hoe near Dover, including the tidal extent of any rivers within this area.

ENVIRONMENT ISO 14001 CERTIFIED
QUALITY ISO 9001 CERTIFIED
POSITIVE ABOUT DISABLED PEOPLE
INVESTORS IN PEOPLE | Bronze

All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the South East Marine Plan, or the UK Marine Policy Statement (MPS) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance, Explore Marine Plans and the Planning Advisory Service soundness self-assessment checklist.

Marine Licensing

The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the UK marine area.

The MMO is responsible for marine licensing in English waters and for Northern Ireland offshore waters.

The marine licensing team are responsible for consenting and regulating any activity that occurs "below mean high water springs" level that would require a marine licence. These activities can range from mooring private jetties to nuclear power plants and offshore windfarms.

Summary notes

These suggested policies from the South East Inshore Marine Plan have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the South East Marine Plan is completed:

- **SE-INF-1:** Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported.
- **SE-INF-2:** (1) Proposals for alternative development at existing safeguarded landing facilities will not be supported.
  (2) Proposals adjacent and opposite existing safeguarded landing facilities must demonstrate that they avoid significant adverse impacts on existing safeguarded landing facilities.
  (3) Proposals for alternative development at existing landing facilities (excluding safeguarded sites) should not be supported unless that facility is no longer viable or capable of being made viable for waterborne transport.
  (4) Proposals adjacent and opposite existing landing facilities (excluding safeguarded sites) should demonstrate that they will in order of preference:
  a) avoid
  b) minimise
  c) mitigate significant adverse impacts on existing landing facilities
- **SE-HER-1:** Proposals that demonstrate they will conserve and enhance elements contributing to the significance of heritage assets will be supported. Proposals unable to conserve and enhance elements contributing to the significance of heritage assets will only be supported if they demonstrate that they will, in order of preference:

a) avoid
b) minimise
c) mitigate harm to those elements contributing to the significance of heritage assets
d) if it is not possible to mitigate, then public benefits for proceeding with the proposal must outweigh the harm to the significance of heritage assets.

- **SE-SCP-1:** Proposals that may have a significant adverse impact upon the seascapes and landscapes of an area should only be supported if they demonstrate that they will, in order of preference:
  a) avoid
  b) minimise
  c) mitigate
  d) if it is not possible to mitigate, the public benefits for proceeding with the proposal must outweigh significant adverse impacts to the seascapes and landscapes of an area. Where possible, proposals should demonstrate that they have considered how highly the seascapes and landscapes of an area is valued, its quality, and the areas potential for change. In addition, the scale and design of the proposal should be compatible with its surroundings, and not have a significant adverse impact on the seascapes and landscapes of an area.
- **SE-CC-1:** Proposals which enhance habitats that provide flood defence or carbon sequestration will be supported. Proposals that may have significant adverse impacts on habitats that provide a flood defence or carbon sequestration ecosystem service must demonstrate that they will, in order of preference:
  a) avoid
  b) minimise
  c) mitigate significant adverse impacts, or, as a last resort,
  d) compensate and deliver environmental net gains in line with and where required in current legislation.
- **SE-CC-2:** Proposals in the south east marine plan area should demonstrate for the lifetime of the project that they are resilient to the impacts of climate change and coastal change.
- **SE-CC-3:** Proposals in the south east marine plan area and adjacent marine plan areas that are likely to have significant adverse impacts on coastal change should not be supported. Proposals that may have significant adverse impacts on climate change adaptation measures outside of the proposed project area must demonstrate that they will, in order of preference:
  a) avoid
  b) minimise
  c) mitigate the significant adverse impacts upon these climate change adaptation measures.
- **SE-AIR-1:** Proposals must assess their direct and indirect impacts upon air quality and emissions of greenhouse gases and air pollutants. Where proposals are likely to result in air pollution or increased greenhouse gas emissions, they must

demonstrate that they will, in order of preference:
a) avoid
b) minimise
c) mitigate air pollution and or greenhouse gas emissions in line with current national and local air quality objectives and legal requirements.

- **SE-WQ-1:** Proposals that enhance and restore water quality will be supported. Proposals that cause deterioration of water quality must demonstrate that they will, in order of preference:
  a) avoid
  b) minimise
  c) mitigate deterioration of water quality in the marine environment.
- **SE-ACC-1:** Proposals demonstrating appropriate enhanced and inclusive public access to and within the marine area, and also demonstrate the future provision of services for tourism and recreation activities, will be supported. Where appropriate and inclusive enhanced public access cannot be provided, proposals should demonstrate that they will, in order of preference:
  a) avoid
  b) minimise
  c) mitigate significant adverse impacts on public access.
- **SE-TR-1:** Proposals that promote or facilitate sustainable tourism and recreation activities, or that create appropriate opportunities to expand or diversify the current use of facilities, should be supported. Where proposals may have a significant adverse impact on tourism and recreation activities they must demonstrate that they will, in order of preference:
  a) avoid
  b) minimise
  c) mitigate that impact.
- **SE-SOC-1:** Those bringing forward proposals are encouraged to consider and enhance public knowledge, understanding, appreciation and enjoyment of the marine environment as part of (the design of) the proposal.

Further points to note

We would also recommend you mention the South East Marine Plan within each of the documents and specifically within the Policy Context section of the Regulation 18 Draft Updated West London Waste Plan. We would also recommend a reference to the requirement of a marine licence for certain activities carried out within the UK marine area (as outlined in the Marine Licensing section above) within these documents.

We would recommend reference to the marine and intertidal element of the area, particularly where both terrestrial and marine habitats have the potential to be impacted by the draft plans.

We would recommend you use the south east marine plan policies as evidence to support your plan. This would add additional evidence to your plan and ensure alignment with the South East Marine Plan.

As previously stated, these are recommendations and we suggest that your own interpretation of the South East Marine Plan is completed. We would also recommend you consult the following references for further information:
South East Marine Plan and Explore Marine Plans.

Yours sincerely,



Marie Canny
[redacted]

Telephone: [redacted]
Mobile: [redacted]
E-mail: [redacted]

fisher german

Our Ref: 105181-024

22 September 2026

[redacted]
t. [redacted]
fishergerman.co.uk

London Borough of Ealing (On behalf of West London Authorities)
WLWastePlan@ealing.gov.uk.
via email only

Dear Sir /Madam,

West London Waste Plan Regulation 19 Consultation August – September 2026 Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Early engagement with NESO is recommended in order to establish available supply capacity to any potential development sites and what, if any, reinforcement is required to ensure adequate continued supply. Please consult with NESO separately from NGET.

Proposed Development Site Allocations or Designations crossed by or in close proximity to NGET assets

Following a review of the above Waste Plan Document, we have identified that one or more proposed development site allocations or designations are crossed by or in close proximity to NGET assets. Details of the sites or designations affecting NGET assets are provided below:

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Development Plan Site / Designation	Asset Description
Safeguarded Waste Site (HI15) - Skip Lane, Harvill Road	ZC ROUTE (TWR 116A - 142): 275Kv Overhead Transmission Line route: IVER - WATFORD SOUTH 1. IVER - WATFORD SOUTH 2.
Safeguarded Waste Site (HO07) – Brentford Aggregate Materials Recycling Facility	Underground Cable Tunnel: EALING – LALEHAM

Plans showing details of NGET assets are attached to this letter. Please note that these plans are illustrative only. NGET also provides information in relation to its assets at the website below.
https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps

NGET Electricity Network Infrastructure

The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable the existing and new electricity generation, storage, and interconnection infrastructure that the country needs to meet the rapid increase in electricity demand required to transition to net zero, while maintaining energy security.

In general, NGET does not own the land crossed by its overhead lines but has responsibility for maintaining the equipment and safe supply of electricity. The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET assets.

Despite this NGET is not a statutory consultee in the plan-making process but it is recommended that NGET are consulted at the earliest possible opportunity in order that advice and guidance can be taken into account on development near overhead lines, or wider policies that may affect the existing or future supply of electricity.

With the above context in mind, the Council should ensure that development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement or future network expansion. The Council should safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations and resist development or highway alterations that would prejudice, constrain or render impractical AIL access unless suitable mitigation or alternative agreed routes can be secured.

Proposed Development Site Allocations or Designations Interactions (Commentary)

Safeguarded Waste Sites – HI15 & HO07 (Appendix 2)

NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.

Previous Response on Behalf of NGET

A response was issued to the Regulation 18 West London Waste Plan Consultation on behalf of NGET on the 02 February 2026. This response proposed the following:

> *"Sites HI15 & HO07*
> *In safeguarding the above waste sites, the Council should remain cognisant of the presence of NGET infrastructure assets within and adjacent to them, particularly in circumstances where development of the sites is required to facilitate their use as waste sites.*

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It is acknowledged that the extent of any development is likely to be minimal, given the nature of the use, but the Council should ensure any future development does not impact negatively on the safe operation and maintenance of the identified NGET infrastructure, having regard for guidance provided, including within this letter."

Following a review of the Regulation 19 Plan, it is not readily discernible whether appropriate provision is made for NGET infrastructure identified within the Safeguarded Sites, nor are there any site-specific policies – namely at Appendix 2 – which would control their development. NGET consider that the Waste Plan should contain appropriate wording which accounts for the presence of NGET Assets associated with the above safeguarded sites.

Given the above context and previous Regulation 18 representation, NGET continue to advocate for the inclusion of the below wording, or wording to the same effect (*Red Italics*) at Policy WLWP 1 as the appropriate overarching Policy. NGET consider this is required for the plan to be fully effective.

"Policy WLWP 1: Safeguarding Waste Sites

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

E. Where relevant, proposals to redevelop safeguarded waste sites will include a strategy for responding to the NGET Overhead Cable Route / Underground Cable Route present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."

Without appropriate acknowledgement of the NGET assets present within the sites, Policy WLWP1 may not be effective as it cannot be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure. Without the wording above or equivalent being added, we must **object** to Policy WLWP1 as currently drafted.



Figure 1: OHL interaction with Safeguarded Waste Site HI15

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Figure 2: Underground Cable Interaction with Safeguarded Waste Site HO07

New Infrastructure

Demand for electricity is expected to rise significantly as the way we power homes, businesses and transport evolves. As the UK transitions towards net zero, fossil fuels will be replaced by increasing volumes of low-carbon electricity, including from offshore wind and other renewable sources.

The UK Government has committed to achieving net zero emissions by 2050, requiring a balanced approach to greenhouse gas emissions and removals. Decarbonising the energy system is central to meeting this national objective.

National Grid Electricity Transmission (NGET) is delivering a range of infrastructure projects across England and Wales to support this energy transition and ensure that the transmission network can accommodate the rapid growth in low-carbon generation.

The way NGET generates electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea. Taking this context into account, In planning for the area the Council should:

- **Safeguard all existing NGET transmission assets**, including overhead lines, underground cables and substations.
- **Support future reinforcement and expansion**, including works required for the Great Grid Upgrade and other strategic national infrastructure projects.
- **Ensure development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement, or future network expansion.**
- **Safeguard existing and potential access routes** required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations.
- **Resist development or highway alterations that would prejudice, constrain or render impracticable AIL access**, unless suitable mitigation or alternative agreed routes can be secured.
- **Encourage early engagement with NGET** to identify and resolve any potential impacts at the earliest possible stage of the planning process.

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RTPI Chartered

bmtrada ISO 9001 CERTIFICATION

UKAS MANAGEMENT SYSTEMS 30691

bmtrada ISO 9001 CERTIFICATION

bmtrada ISO 9001 CERTIFICATION

UKAS MANAGEMENT SYSTEMS 0012

Protecting existing assets and enabling future network development will ensure that the Council contributes effectively to national decarbonisation targets while supporting local growth, resilience and energy security.

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.

We would be grateful if you could add our details shown below to your consultation database, if not already included:

[redacted]

[redacted]

Fisher German LLP

[redacted]

[redacted]

[redacted]

National Grid Electricity Transmission

[redacted]

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

[redacted]

[redacted]

[redacted]

For and on behalf of Fisher German LLP

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Further Guidance

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Working Near NGET Assets

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's 'Design guidelines for development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgrid.com/document/345326/download

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their Technical Guidance Note 'Third-party guidance for working near National Grid Electricity Transmission equipment', which can be downloaded here: https://www.nationalgrid.com/document/349291/download

NGET have produced additional guidance for decision makers on operational noise emitted from existing and planned substation infrastructure. Detail is provided for environmental factors, established acceptable British standards and the 'Agent of Change' principle underpinned by the NPPF. More information can be accessed here: https://www.nationalgrid.com/document/573711/download

Further information on working near NGET assets can be found on the following webpage: https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/working-near-our-assets

Assessing Electricity Network Infrastructure Applications

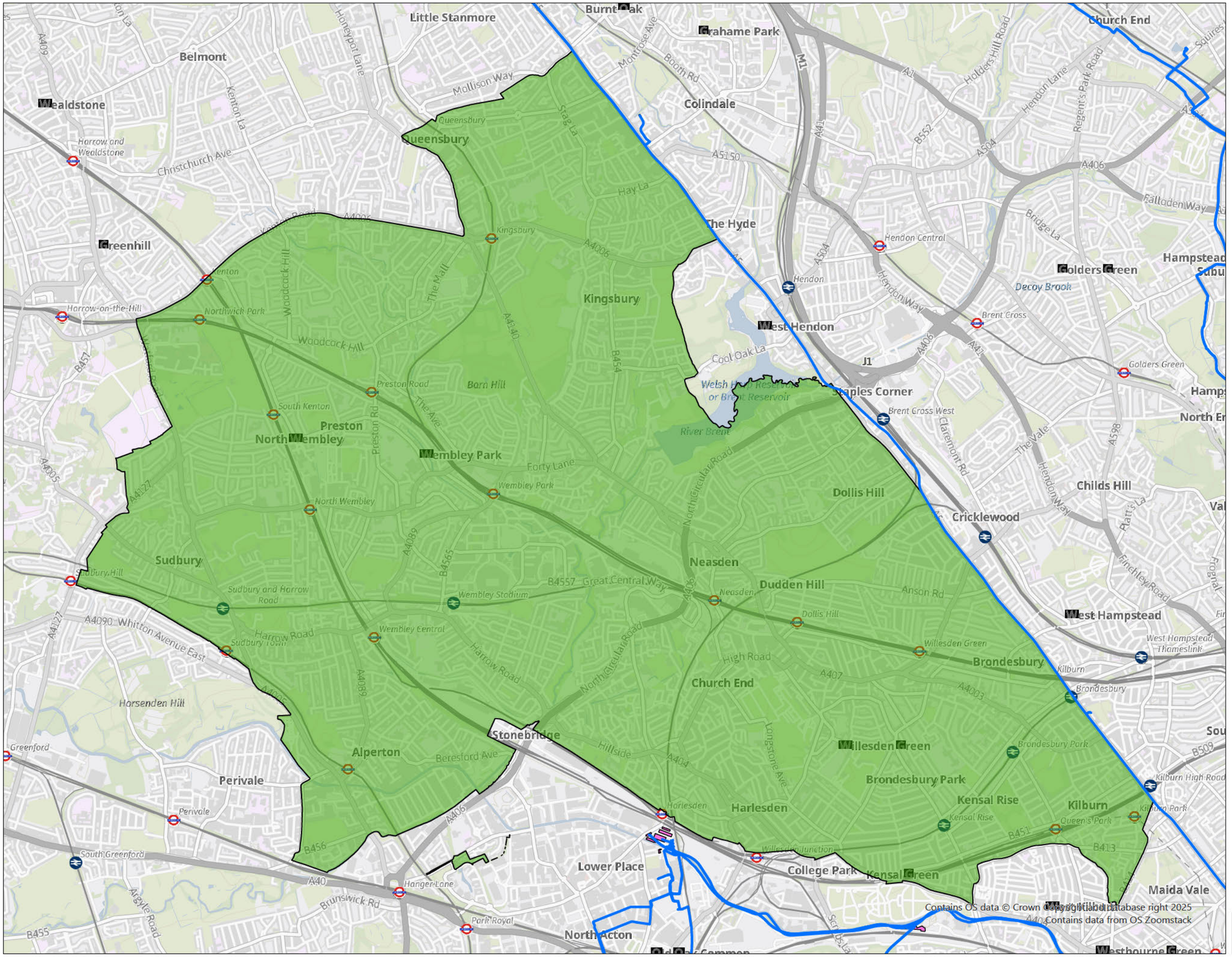
Regen, in partnership with the Department for Energy Security and Net Zero (DESNZ) have produced guidance for LPA's on assessing electricity network infrastructure applications. This is intended to be used as a practical tool for officers and details various legislative frameworks and infrastructure components that NGET engage with. More information can be accessed here: https://3477141.fs1.hubspotusercontent-na1.net/hubfs/3477141/DESNZ%20planner%20guides/2026-03-31%20Assessing%20electricity%20network%20infrastructure%20applications%20-%20Regen.pdf

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: https://lsbud.co.uk/

For local planning policy queries, please contact: ngplanning@fishergerman.co.uk

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CLIENT: nationalgrid

SCHEME:
PLANNING INTERACTION

TITLE:
LPA ASSET INTERACTION

FP: 105181-024

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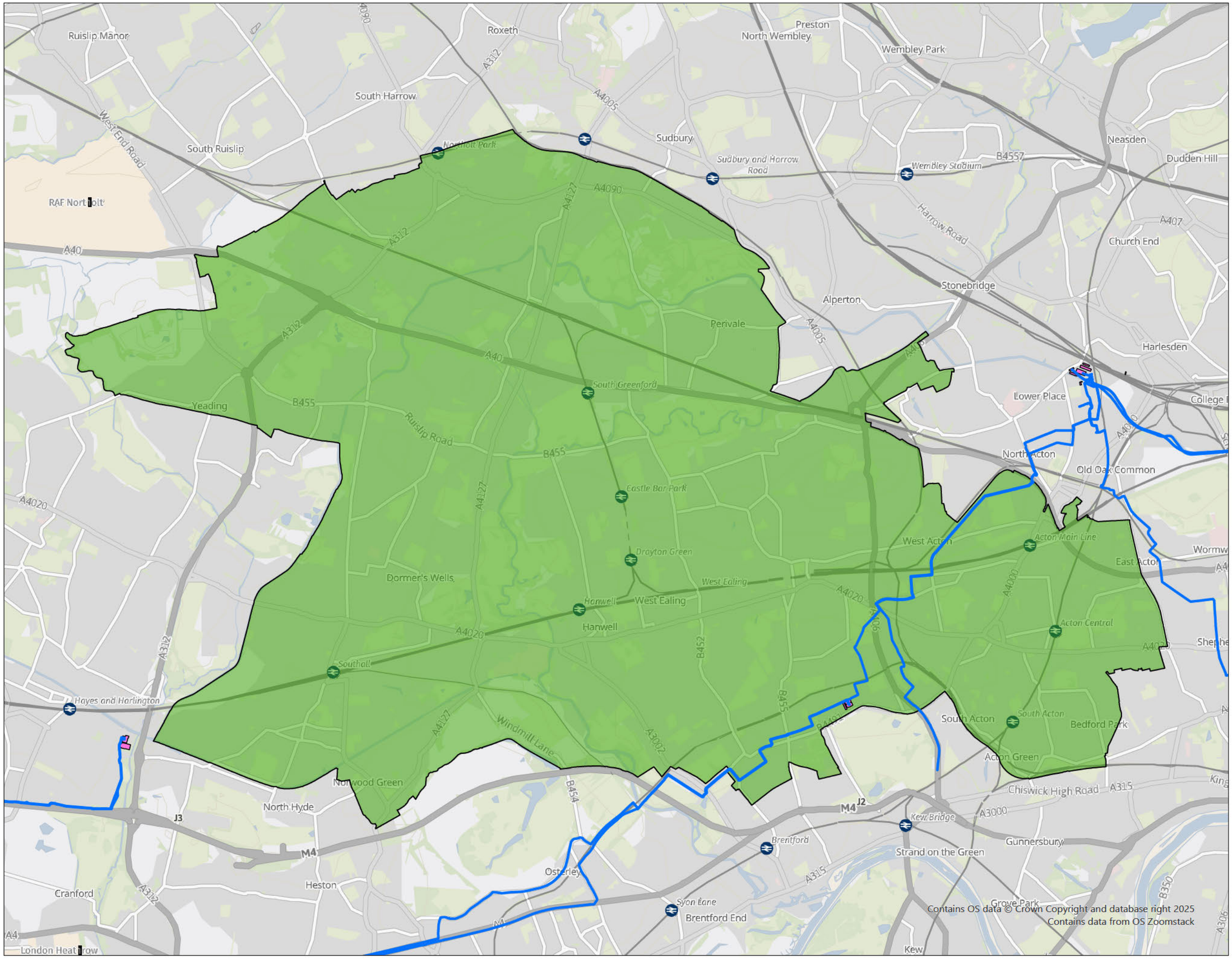
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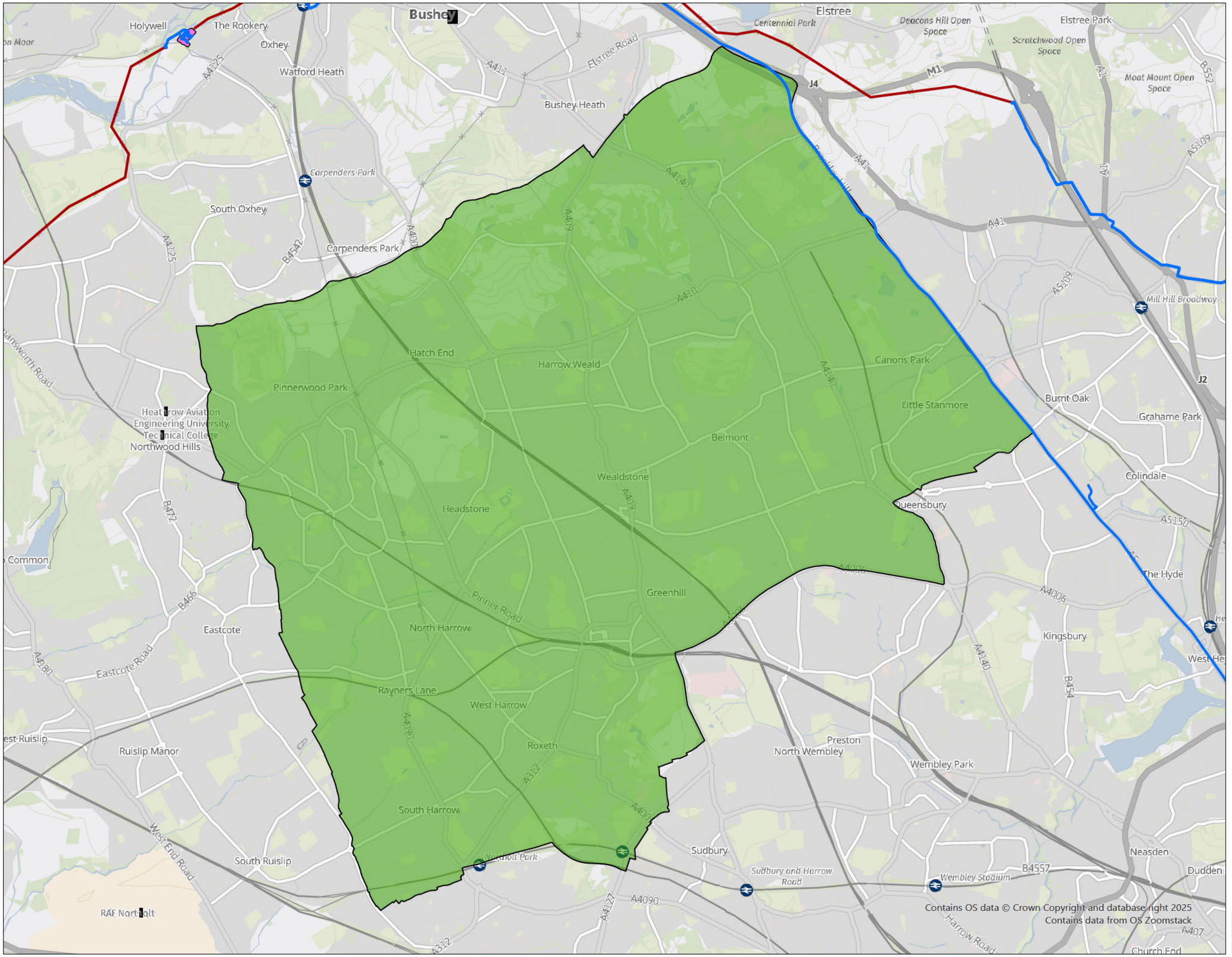
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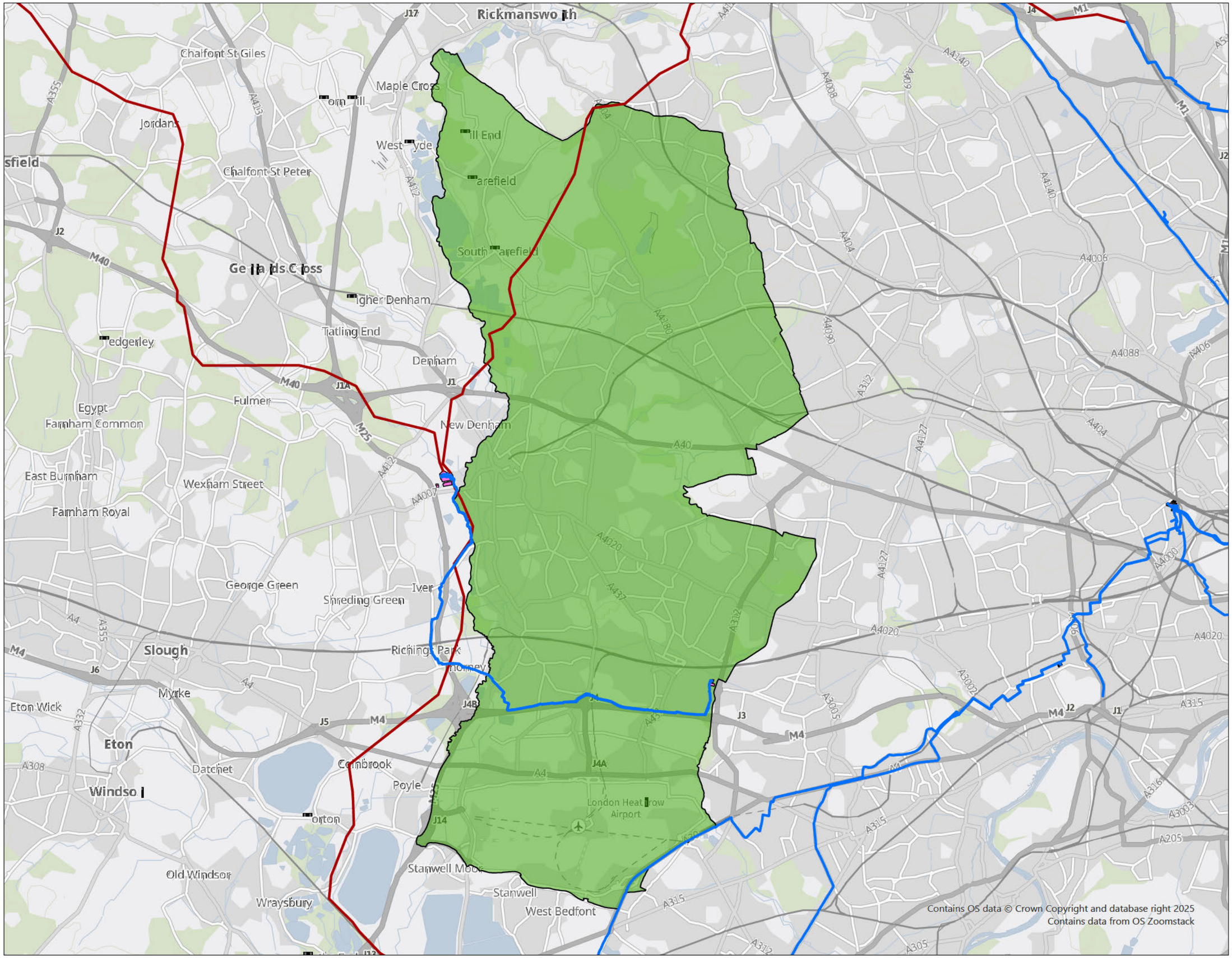
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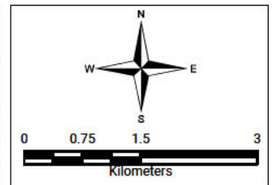
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OVERVIEW WINDOW



LEGEND:

- Cable
- OHL
- Substation
- LPA Area

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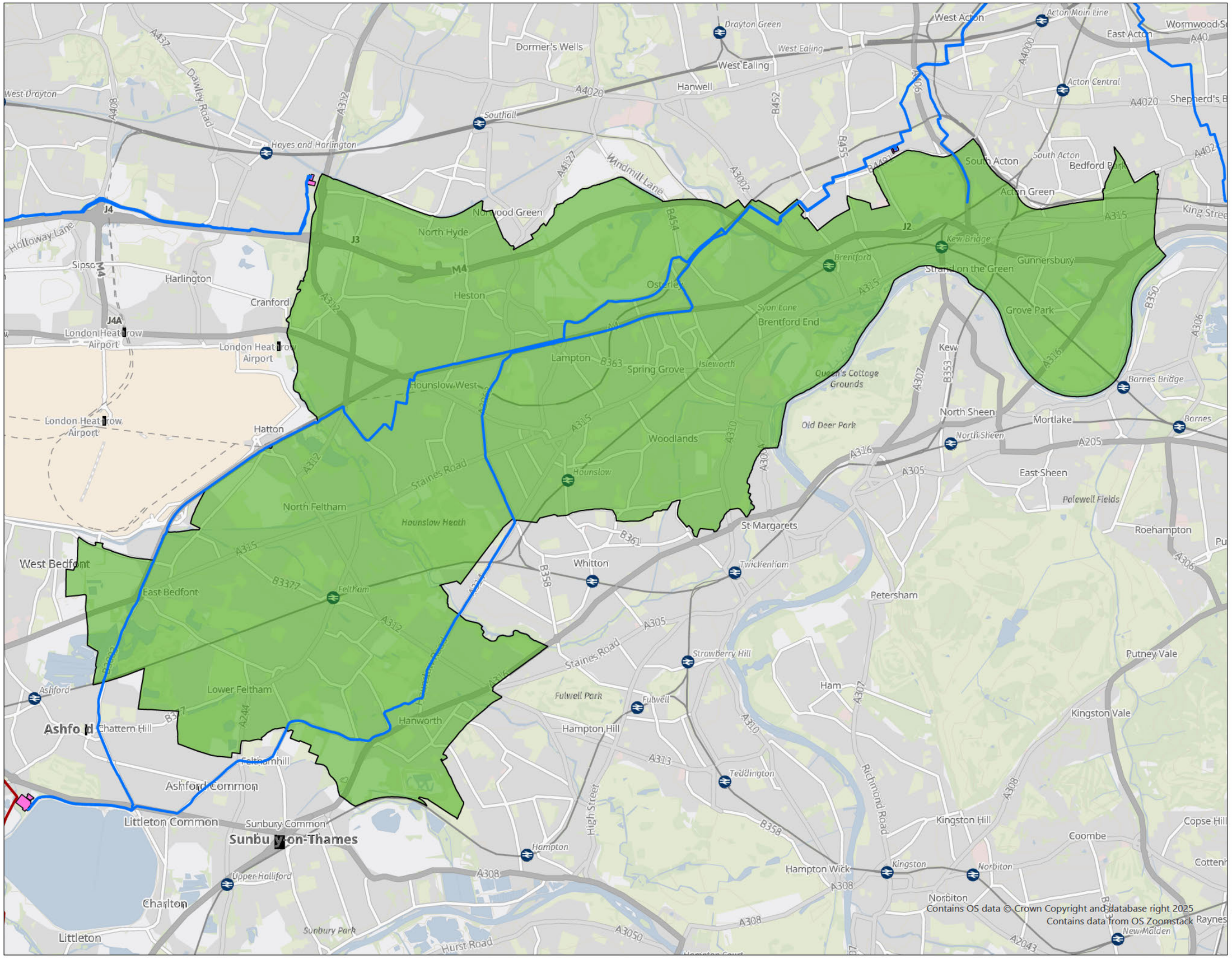
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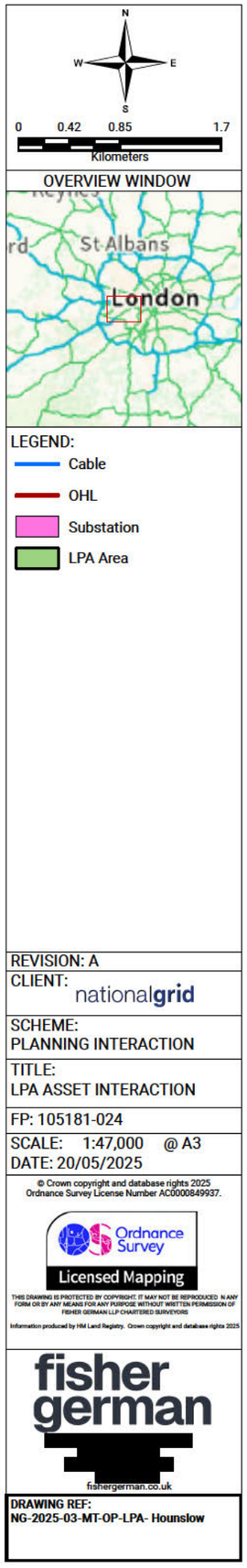
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LEGEND:

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- OHL
- Substation
- LPA Area

REVISION: A

CLIENT: nationalgrid

SCHEME: PLANNING INTERACTION

TITLE: LPA ASSET INTERACTION

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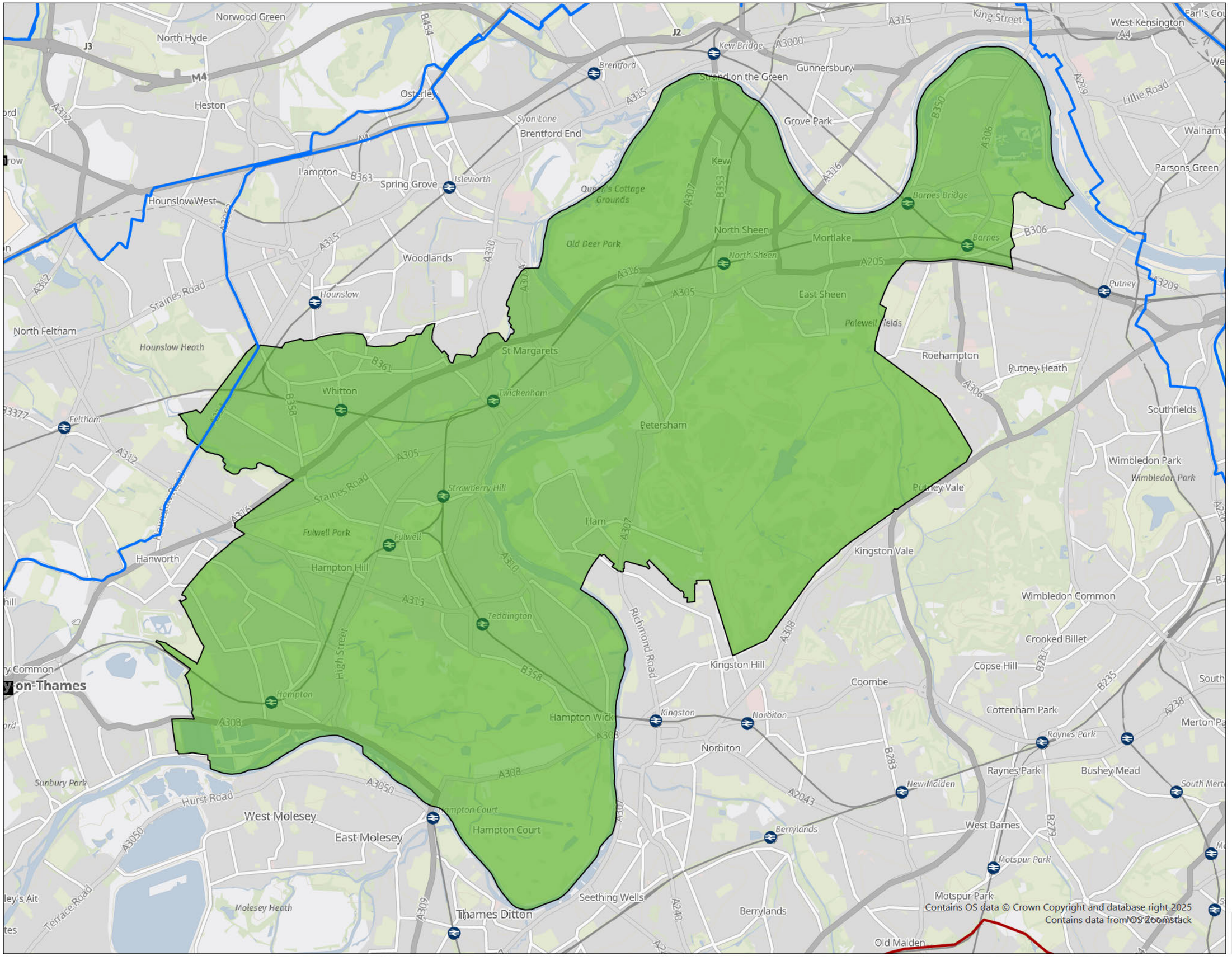
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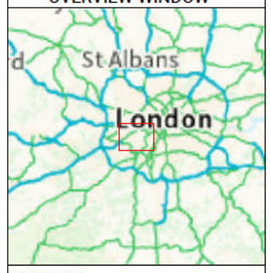
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OVERVIEW WINDOW



LEGEND:
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- OHL
- Substation
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CLIENT: nationalgrid

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wlwasteplan

From: Martin Hempell [redacted]
Sent: 28 September 2026 14:12
To: wlwasteplan
Cc: Planning SE; [redacted]
Subject: 280926 NH/26/17390 Ealing - National Highways response to West London Waste Plan Consultation

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FAO: West London Waste Planning Team (on behalf of the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond upon Thames and the Old Oak and Park Royal Development Corporation).

Our Reference: NH/26/17390 / NH/26/17414 / NH/26/17415 / NH/26/17412

Re: West London Waste Plan Consultation

Dear West London Waste Planning Team,

Thank you for your email dated 3 August 2026 inviting National Highways to comment on the West London Waste Plan (WLWP) consultation. We have reviewed the Regulation 19 Proposed Submission West London Waste Plan document, dated May 2026, and have provided our comments below.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority, and street authority for the strategic road network (SRN). The SRN is a critical national asset and, as such, National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the M25, M4, M40/A40, M1 and the M3 all of which fall within or just outside of the west London Borough boundaries.

It is noted that the WLWP includes a Vision and five Strategic Objectives alongside seven policies that will guide decisions about waste related planning applications or applications for planning permission that would impact on safeguarded waste sites. The Vision states that the land to be used for waste management over the next 15 years will focus on the efficient and flexible use of safeguarded waste sites, railheads and wharves for waste. It is also noted from Strategic Objective 3 that the WLWP intends to utilise and expand sustainable transport options for waste movement, including rail and water freight, to reduce road-miles.

Given there is sufficient capacity in West London to meet the management requirements for the identified waste streams, the WLWP does not propose to allocate any specific areas of land for the development of additional waste management facilities. Therefore, we are satisfied that this consultation does not directly impact National Highways or our network.

Thank you for consulting National Highways. Should you have any further queries please contact us via our inbox at [redacted]

Kind regards,

Martin Hempell, [redacted]
[redacted]
[redacted]
[redacted]
Tel: [redacted]
Web: nationalhighways.co.uk

From: wlwasteplan <wlwasteplan@ealing.gov.uk>
Sent: 03 August 2026 18:05
To: Planning SE [redacted]
Subject: West London Waste Plan Consultation

> You don't often get email from wlwasteplan@ealing.gov.uk. Learn why this is important

Dear Stakeholder,

We are writing to inform you that the West London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames, together with the Old Oak and Park Royal Development Corporation (OPDC), are publishing the Proposed Submission version of the West London Waste Plan (WLWP) for comment.

This important document sets out the proposed planning strategy for waste management for these authorities up to 2041 and includes policies that are proposed to be used when assessing planning applications related to waste management development. It also identifies sites proposed to be safeguarded for waste use.

The WLWP aims to provide an up to date, sound and effective planning strategy for waste management in accordance with national policy, the London Plan, and local priorities. We consulted previously on a draft updated West London Waste Plan and the comments received have helped shape the Proposed Submission version. If adopted, the updated West London Waste Plan would replace the current 2015 WLWP.

Please note you may have received this notification more than once from different authorities – you only need to respond once as all responses will be collated.

This is the final opportunity to comment before the documents are submitted to the Secretary of State for Examination, the west London boroughs and OPDC invite representations on whether the Proposed Submission WLWP is 'sound' and 'legally compliant', including whether it is in general conformity with the London Plan. Please visit

haveyoursay.ealing.gov.uk/projects/wlwp-consultation to find out more about the Plan and answers to some frequently asked questions.

How can I view and comment on the documents?

Ealing Council is hosting the consultation on their online portal, on behalf of the other planning authorities involved. You can view the Proposed Submission WLWP and its supporting documents, including the Integrated Impact Assessment and Habitats Regulations Assessment, via Ealing Council's online consultation portal: **haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation.** The Statement of Representations Procedure and Statement of Fact' can be accessed with the above link. Reference copies of the Proposed Submission WLWP are also publicly available for inspection at various libraries and offices listed on the online consultation portal - more details are in the 'Statement of Representations Procedure and Statement of Fact'.

The publication period closes on **Monday 28th September** (23:59). You are invited to provide feedback on the Proposed Submission WLWP and the supporting documents. You can submit your comments to us in writing by any of the following methods:

- Complete an online questionnaire on Ealing Council's online consultation portal using the above website.
- Email your completed response form to wlwasteplan@ealing.gov.uk. A PDF and a Word version of the form can be found at haveyoursay.ealing.gov.uk/projects/wlwp-consultation. In the Word version, you can type in your response and return it as an email attachment.
- Complete and post printed copies of the response form to the address given below. Printed copies are available at the selected locations listed on the consultation portal.
    - Post written responses to:
      Planning and Infrastructure
      West London Alliance
      Ealing Council
      5th Floor, Perceval House
      14-16 Uxbridge Road
      Ealing, W5 2HL
- Email responses to: wlwasteplan@ealing.gov.uk

If you have any questions about the consultation, or need the documents in an alternative format, please contact the WLWP Project Manager, wlwasteplan@ealing.gov.uk

Following the completion of the publication process, all responses received will be submitted to the Government with the WLWP and other supporting documents, for examination by an

independent planning inspector. Please note that your response will not be treated as confidential and any anonymous responses will not be accepted. Responses to this consultation will be published, with any personal contact details redacted in accordance with general data protection principles.

The authorities are committed to ensuring that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure. If you submit comments, your consultation responses and personal data will be passed to the Planning Inspectorate and a Programme Officer. The Privacy Statement is published on the webpage https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation. We hope that you or your organisation will continue to take an interest in the progression of the West London Waste Plan. If, however, you would prefer not to receive notifications, you can let us know.

Yours faithfully,

The West London Waste Planning Team
On behalf of the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond upon Thames and the Old Oak and Park Royal Development Corporation.



****

Please consider the environment before printing this email.

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National Highways Limited | General enquiries: [redacted]
https://nationalhighways.co.uk | [redacted]

Registered in England and Wales no 9346363 | Registered Office: [redacted]

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This email may contain information which is confidential and is intended only for use of the recipient/s named above. If you are not an intended recipient, you are hereby notified that any copying, distribution, disclosure, reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please notify the sender and destroy it.

National Highways Limited | General enquiries: [redacted]
https://nationalhighways.co.uk | [redacted]

Registered in England and Wales no 9346363 | Registered Office: [redacted]

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Consultation on the Proposed Submission West London Waste Plan

From 4th August to 28th September 2026

RESPONSE FORM

The London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond-upon-Thames and the Old Oak and Park Royal Development Corporation are inviting comments on the Proposed Submission West London Waste Plan (WLWP).

The Proposed Submission WLWP sets out the proposed planning strategy for waste management in the plan area up to 2041, including identifying sites proposed to be safeguarded for waste use.

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

- Policy WLWP 1 – Safeguarding Waste Sites
- Policy WLWP 2 – Provision of Additional Waste Management Capacity
- Policy WLWP 3 – Residual Waste Management and Energy Recovery
- Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities
- Policy WLWP 5 – Recovery and Disposal of Waste to Land
- Policy WLWP 6 – Circular Economy and Resource Efficiency
- Policy WLWP 7 – Wastewater Treatment Infrastructure

This consultation is the final opportunity to comment on the Proposed Submission WLWP before it is submitted to the Secretary of State for independent 'examination in public'. We would like to hear views from our local communities, businesses and other stakeholders. At this stage in the plan making process, in accordance with the national guidance, consultation responses should focus on whether the WLWP has been developed in compliance with the relevant legal and procedural requirements, including that the plan should be in general conformity with the London Plan, and the 'soundness' of the Plan. A guidance note and answers to Frequently Asked Questions provide further detail on these terms – this document is available on the online consultation portal (via the link below) alongside other supporting information.

How to respond

All the information needed to take part in the consultation can be found on Ealing Council's online consultation portal: https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation This includes the Proposed Submission WLWP, maps and all supporting evidence. Printed copies of the Plan and key supporting documents will also be available to view at the west London Boroughs' and OPDC's main offices and selected venues in the WLWP plan area. For further information on these, please visit the online consultation portal.

You can comment on the consultation documents in the following ways:

- Online questionnaire on the consultation portal https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation
- Email a response form to WLWastePlan@ealing.gov.uk a PDF and Word version of the form can be found at

https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation . In the form, in 'Word' format you can type in your response and return it as an email attachment.

- Complete and post printed copies of the response form to the address given below. Printed copies are available at the selected locations listed on the consultation portal.
- Post written responses to:

  Planning and Infrastructure
  West London Alliance
  Ealing Council
  5th Floor, Perceval House
  14-16 Uxbridge Road
  Ealing, W5 2HL

All responses must be received by 23:59 on Monday 28th September 2026.

This form has two parts:

- Part A – Personal details and About You
- Part B – Your detailed response(s).

If you wish to comment on multiple documents or sections of the plan or supporting material, then we recommend that you download and use a separate Part B form for each comment and attach these to your postal response or email.

Part A: Personal Details		
	1. Personal Details *	**2. Agent's Details (if applicable)**
Title		
First name	Katy	
Last name	Wiseman	
Job title (where relevant)	[redacted]	
Organisation (where relevant)	National Trust	
Address	[redacted]	
Postcode	[redacted]	
Telephone	[redacted]	
E-mail address	[redacted]	

*If an agent is appointed, please provide the full contact details of the agent plus the person (title, name) or organisation they are acting for.

Part A: About You…	
3. Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	
[redacted]	
[redacted]	
[redacted]	
Other - please state what your specific interest in west London might be.	Landowner / Historic Tourist Attraction

Data protection

We will ensure that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure.

The Privacy Statement is published on the webpage https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

All responses will be held by the London Borough of Ealing. Responses will not be treated as confidential and will be published on its website and in any subsequent statements, attributed by name and/or organisation; however, personal details like address, phone number or email address will be removed.

If you submit comments, your consultation responses and personal data will be passed to the Planning Inspectorate and a Programme Officer. The Programme Officer manages the procedural and administrative aspects of the examination. The Programme Officer will contact you using the personal information you have provided if you have indicated in the response form your wish to engage in the Examination.

Part B: Your Detailed Response			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
If you have more detailed comments to make on what the Plan should contain, please download the form, Part B– Additional Responses Continued, or print additional versions of this form, being clear about page numbers, paragraphs or infographics to which they apply, and append to your response form.			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	74
		Paragraph number(s)	
		Policy no./name	WLWP4 criterion 3
		Site no./ name (see Appendices to the Plan)	
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		

5. Do you consider the West London Waste Plan is:		
5.1 Legally compliant	Yes ☒	No ☐
5.2 Sound	Yes ☐	No ☒

Further information on these terms is included within the guidance note and answers to Frequently Asked Questions available on the website at https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.

With our staff, members, volunteers and supporters, the National Trust is the biggest conservation charity in Europe. We protect and care for places so people and nature can thrive. Many millions share the belief that nature, beauty and history are for everyone. So we look after the nation's coastline, historic sites, countryside and green spaces, ensuring everyone benefits. For everyone, for ever.

The conservation of the natural and historic environment is of fundamental importance to the National Trust. Osterley House a Grade I listed building (list entry: 1080308) and Osterley Park a Grade II Registered Park and Garden (list entry: 1000287) are significant heritage assets located within the Hounslow Borough and within 1km of existing waste sites (HO07, HO14 and HO05). Although the Plan does not identify specific areas of land for the development of additional waste management capacity, it makes provision for the intensification of these existing safeguarded sites. It is therefore important that any changes, such as intensification of these sites avoids adverse impacts on the historic environment. Whilst the Trust welcomes the purpose of policy WLWP 4 which seeks to deliver waste management facilities to the highest standards of environmental protection. We are pleased that reference is made within paragraph 8.42 to heritage assets, archaeology and the historic environment, but feel Policy WLWP 4 policy wording could be strengthened to ensure applicants and decision makers know that reference to 'environment' includes the consideration of impacts on both the natural and historic environment.*

Please continue on a separate sheet / expand box if necessary.

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or

sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
Suggested wording change for Policy WLWP4 criterion 3 to ensure soundness, 'it will deliver a lasting and positive contribution to local communities, the economy and to the protection and enhancement of the natural and historic environment throughout its operational life and post-closure (if applicable) and incorporates measures to...). This would ensure Policy WLWP 4 of the Waste Plan is consistent with policy objectives set out within Chapters 19 and 20 of the NPPF.
Please continue on a separate sheet / expand box if necessary.
Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.*
8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☒ **No**, I do not wish to participate in hearing session(s)	☐ **Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.
9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: ***Please note*** *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the West London Waste Plan.			
If you do not wish to be notified of future updates on the West London Waste Plan, then please tick this box, complete Part A: Personal Details of this form and return it to us. Note your name, business (if entered) and response will still be published in the consultation report.			☐
Signature:	Katy Wiseman	Date:	24.09.2026
For electronic responses a typed signature is acceptable.			

Network Rail
[redacted]

Via email only: WLWastePlan@ealing.gov.uk

25 September 2026

Dear Planning,

NETWORK RAIL CONSULTATION RESPONSE TO PROPOSED SUBMISSION WEST LONDON WASTE PLAN REGULATION 19

Network Rail Infrastructure Limited ('Network Rail') submits representations to the proposed submission West London Waste Plan (WLWP) Regulation 19 consultation. Network Rail (NR) welcomes the opportunity to comment on the WLWP.

NR is the owner and maintainer of the railway infrastructure supporting both passenger trains and rail freight. NR has strong relationships with Freight Operating Companies (FOC) and work with these to promote the use of rail freight and associated railheads. As such, NR has an interest in commenting on the WLWP and our comments on the soundness of the WLWP are set out below.

Policy WLWP 1: Safeguarding Waste Sites

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

Firstly, the policy intent of Part H is not clear in terms of what is meant by safeguarding of railhead and wharf '*capacity for waste transportation'*. The assumption is this is referring to the capacity of these sites to transport waste which for railheads include the number of train movements. This approach is not **justified** as the safeguarding of railheads and wharves on the basis of 'capacity', particularly where no definition is provided as to how 'capacity' will be determined, as opposed to simply safeguarding the railhead or wharf for waste transportation is not considered to represent the most appropriate strategy when considered against the reasonable alternatives and the strategic policy framework for safeguarding of such sites.

The Policy reference to 'capacity' of rail sites being safeguarded is not clear and is ambiguous in terms of how it is to be applied and is therefore not **effective**. This is also not **compliant with national policy** as the NPPF requires Plans contain policies that are clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals (para 16 (d)).

Part H also reads '*In the event that the existing waste site ceases to be safeguarded for waste use, the safeguarding of the associated railhead or wharf for waste transport will also cease."*

The intent of this wording is not clear as it could be read as setting out a blanket removal of safeguarding of the associated railhead or wharf when a waste site ceases to be safeguarded. This is not **justified** nor is it in **compliance with national policy**, particularly in the context of safeguarding requirements as set out in the NPPF and London Plan.

Proposed Modification

To address the lack of soundness, the following modification should be made (in italics and underlined).

"H. Railheads and wharves ~~capacity for waste transportation~~ associated with a safeguarded waste site will be safeguarded for waste *transportation* use where ~~it~~ this does not conflict with other existing or planned uses. In the event that the existing waste site ceases to be safeguarded for waste use, the safeguarding of the associated railhead or wharf for waste transportation will also cease, *with any other rail related safeguarding remaining in place*."

For consistency, paragraph 8.17 should be amended alongside the above proposed modification. 8.17 appears to be a copy of part H of the draft Policy and adds little aside from '*while safeguarding of capacity for other uses continues to apply'.* This is closer to the modification required however specific reference to rail related safeguarding is required. This should be changed to include 'for example for the bulk transport of minerals, especially by rail, as required by the NPPF and London Plan.

The new paragraph 8.17 would therefore read '*Railheads and wharf associated with a safeguarded waste site are also safeguarded for waste transportation use, where such use does not conflict with other existing or planned uses. However, in the event that the waste site ceases to be safeguarded for waste use, the safeguarding of the associated railhead or wharf for waste transportation will also cease, while safeguarding of capacity for other uses continues to apply for example for the bulk transport of minerals, especially by rail, as required by the NPPF and London Plan.*

The above changes are considered necessary to ensure that the WLWP is justified and in conformity with national policy (including the London Plan) and therefore meets the tests of soundness.

I trust the above is clear however do let me know if anything further is required.
.

Yours Sincerely

Craig Hatton

[redacted]
Network Rail Infrastructure Limited

Consultation on the Proposed Submission West London Waste Plan

From 4th August to 28th September 2026

RESPONSE FORM

The London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond-upon-Thames and the Old Oak and Park Royal Development Corporation are inviting comments on the Proposed Submission West London Waste Plan (WLWP).

The Proposed Submission WLWP sets out the proposed planning strategy for waste management in the plan area up to 2041, including identifying sites proposed to be safeguarded for waste use.

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

- Policy WLWP 1 – Safeguarding Waste Sites
- Policy WLWP 2 – Provision of Additional Waste Management Capacity
- Policy WLWP 3 – Residual Waste Management and Energy Recovery
- Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities
- Policy WLWP 5 – Recovery and Disposal of Waste to Land
- Policy WLWP 6 – Circular Economy and Resource Efficiency
- Policy WLWP 7 – Wastewater Treatment Infrastructure

This consultation is the final opportunity to comment on the Proposed Submission WLWP before it is submitted to the Secretary of State for independent 'examination in public'. We would like to hear views from our local communities, businesses and other stakeholders. At this stage in the plan making process, in accordance with the national guidance, consultation responses should focus on whether the WLWP has been developed in compliance with the relevant legal and procedural requirements, including that the plan should be in general conformity with the London Plan, and the 'soundness' of the Plan. A guidance note and answers to Frequently Asked Questions provide further detail on these terms – this document is available on the online consultation portal (via the link below) alongside other supporting information.

How to respond

All the information needed to take part in the consultation can be found on Ealing Council's online consultation portal:
https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation
This includes the Proposed Submission WLWP, maps and all supporting evidence. Printed copies of the Plan and key supporting documents will also be available to view at the west London Boroughs' and OPDC's main offices and selected venues in the WLWP plan area. For further information on these, please visit the online consultation portal.

You can comment on the consultation documents in the following ways:

- Online questionnaire on the consultation portal https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation
- Email a response form to WLWastePlan@ealing.gov.uk a PDF and Word version of the form can be found at

https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation . In the form, in 'Word' format you can type in your response and return it as an email attachment.

- Complete and post printed copies of the response form to the address given below. Printed copies are available at the selected locations listed on the consultation portal.
- Post written responses to:

  Planning and Infrastructure
  West London Alliance
  Ealing Council
  5th Floor, Perceval House
  14-16 Uxbridge Road
  Ealing, W5 2HL

All responses must be received by 23:59 on Monday 28th September 2026.

This form has two parts:

- Part A – Personal details and About You
- Part B – Your detailed response(s).

If you wish to comment on multiple documents or sections of the plan or supporting material, then we recommend that you download and use a separate Part B form for each comment and attach these to your postal response or email.

Part A: Personal Details		
	1. Personal Details *	**2. Agent's Details (if applicable)**
Title	Ms	
First name	Irene	
Last name	Man	
Job title (where relevant)	[redacted]	
Organisation (where relevant)	Old Oak and Park Royal Development Corporation	
Address	[redacted]	
Postcode	[redacted]	
Telephone	[redacted]	
E-mail address	[redacted]	

*If an agent is appointed, please provide the full contact details of the agent plus the person (title, name) or organisation they are acting for.

Part A: About You...		
3. Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)		
Do you live in West London?	Yes ☐	No ☐
Do you work in West London?	Yes ☐	No ☐
Do you run a business in West London?	Yes ☐	No ☐
Other - please state what your specific interest in west London might be.	OPDC is Mayoral Development Corporation whose administrative area falls within the boundary of the West London Waste Plan.	

Data protection

We will ensure that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure.

The Privacy Statement is published on the webpage https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

All responses will be held by the London Borough of Ealing. Responses will not be treated as confidential and will be published on its website and in any subsequent statements, attributed by name and/or organisation; however, personal details like address, phone number or email address will be removed.

If you submit comments, your consultation responses and personal data will be passed to the Planning Inspectorate and a Programme Officer. The Programme Officer manages the procedural and administrative aspects of the examination. The Programme Officer will contact you using the personal information you have provided if you have indicated in the response form your wish to engage in the Examination.

Part B: Your Detailed Response			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
If you have more detailed comments to make on what the Plan should contain, please download the form, Part B– Additional Responses Continued, or print additional versions of this form, being clear about page numbers, paragraphs or infographics to which they apply, and append to your response form.			
Documents		**Sections**	
Proposed Submission West London Waste Plan	X	Page number(s)	202
		Paragraph number(s)	
		Policy no./name	
		Site no./ name (see Appendices to the Plan)	
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		

5. Do you consider the West London Waste Plan is:		
5.1 Legally compliant	Yes X	No ☐
5.2 Sound	Yes X	No ☐

Further information on these terms is included within the guidance note and answers to Frequently Asked Questions available on the website at https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.

These comments are submitted on behalf of the Old Oak and Park Royal Development Corporation (OPDC) Delivery Team. OPDC was established in 2015 to secure the regeneration of the OPDC Area. The Regeneration Proposals at Old Oak comprise the creation of a new urban district that will become a major new gateway between the capital and the rest of the country. The proposals include the delivery of approximately 8,000 new homes, approximately 150,000-200,000 sqm of new commercial and employment space, new active travel routes and bridges, new parks and open space, a primary school and leisure, health and community provision.

The OPDC Delivery Team is supportive of the Regulation 19 Proposed Submission West London Waste Plan's proposal to release the Atlas Wharf, Atlas Road and Formerly Quattro, Victoria Road sites from safeguarding as identified in Appendix 6 of the consultation document. These sites are identified for redevelopment in the OPDC Local Plan (2022) as well as the Old Oak Masterplan Framework, which was endorsed by the OPDC Board in November 2025 and is capable of being a material consideration for future planning applications. The release of these sites is fundamental to enable the comprehensive mixed-use regeneration of Old Oak.

Please continue on a separate sheet / expand box if necessary.

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or

sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
Please continue on a separate sheet / expand box if necessary.
Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.*
8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X **No**, I do not wish to participate in hearing session(s)	☐ **Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.
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Signature:	Irene Man	Date:	28 September 2026
For electronic responses a typed signature is acceptable.			

OXFORDSHIRE COUNTY COUNCIL

[redacted]

Planning and Infrastructure
West London Alliance
Ealing Council
5th Floor, Perceval House
14-16 Uxbridge Road
Ealing, W5 2HL

24th September 2026

- *By email:* wlwasteplan@ealing.gov.uk

West London Waste Plan Consultation Reg 19 Submission Draft

Response from Oxfordshire County Council's Minerals and Waste Policy and Strategy Team

Dear Sir

Thank you for your consultation on the West London Waste Plan.

We only have one comment to make, and it is in reference to your section entitled Flows to and from West London (Pages 200 – 201) Paragraph A5.17 and your supporting waste evidence.

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

The Environment Agency Waste Data Interrogator figures for 2024 show that Hounslow, Hillingdon and Ealing exported more than 15,000 tonnes (of which approx.11,000 tonnes HIC) of waste to Sutton Courtenay Landfill Site in Oxfordshire.

Oxfordshire is a member of the South-East Waste Planning Advisory Group (SEWPAG) and we have agreed the below thresholds for waste movements considered to be 'strategic'.

- Non-hazardous waste – 5,000 tonnes per annum
- Hazardous waste - 100 tonnes per annum

- Inert waste – 10,000 tonnes per annum

We consider any movements which are above the thresholds as above to be considered a strategic waste movement.

Therefore the 2024 movement of waste from West London (Hounslow, Hillingdon and Ealing) would be considered strategic. The majority of these movements go to one site, Sutton Courtenay Landfill.

Sutton Courtenay Landfill Site is expected to close in 2030, and the current Minerals and Waste Local Plan runs to 2031. While Policy M6 of the Oxfordshire Minerals and Waste Local Plan recognises the movement of waste from London into Oxfordshire, it also makes clear that no further provision will be made for the disposal of non-hazardous waste by landfill.

We have not had any discussions or reached agreement with West London for the management of waste past our current Plan Period.

Therefore, due to Sutton Courtenay's closure, it is not expected that the movement of waste from West London to Oxfordshire can continue throughout the Plan period to 2041. The statement regarding continuity is therefore not correct in relation to Oxfordshire WPA.

Happy to discuss the matter further and we look forward to hearing from you.

Yours faithfully

Debbie Prince
[redacted]

On behalf of Oxfordshire County Council Minerals and Waste Policy and Strategy

Consultation on the Proposed Submission West London Waste Plan

From 4th August to 28th September 2026

RESPONSE FORM

The London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond-upon-Thames and the Old Oak and Park Royal Development Corporation are inviting comments on the Proposed Submission West London Waste Plan (WLWP).

The Proposed Submission WLWP sets out the proposed planning strategy for waste management in the plan area up to 2041, including identifying sites proposed to be safeguarded for waste use.

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

- Policy WLWP 1 – Safeguarding Waste Sites
- Policy WLWP 2 – Provision of Additional Waste Management Capacity
- Policy WLWP 3 – Residual Waste Management and Energy Recovery
- Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities
- Policy WLWP 5 – Recovery and Disposal of Waste to Land
- Policy WLWP 6 – Circular Economy and Resource Efficiency
- Policy WLWP 7 – Wastewater Treatment Infrastructure

This consultation is the final opportunity to comment on the Proposed Submission WLWP before it is submitted to the Secretary of State for independent 'examination in public'. We would like to hear views from our local communities, businesses and other stakeholders. At this stage in the plan making process, in accordance with the national guidance, consultation responses should focus on whether the WLWP has been developed in compliance with the relevant legal and procedural requirements, including that the plan should be in general conformity with the London Plan, and the 'soundness' of the Plan. A guidance note and answers to Frequently Asked Questions provide further detail on these terms – this document is available on the online consultation portal (via the link below) alongside other supporting information.

How to respond

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- Post written responses to:

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  West London Alliance
  Ealing Council
  5th Floor, Perceval House
  14-16 Uxbridge Road
  Ealing, W5 2HL

All responses must be received by 23:59 on Monday 28th September 2026.

This form has two parts:

- Part A – Personal details and About You
- Part B – Your detailed response(s).

If you wish to comment on multiple documents or sections of the plan or supporting material, then we recommend that you download and use a separate Part B form for each comment and attach these to your postal response or email.

Part A: Personal Details		
	1. Personal Details *	**2. Agent's Details (if applicable)**
Title	Mr	
First name	Michael	
Last name	Atkins	
Job title (where relevant)	[redacted]	
Organisation (where relevant)	Port of London Authority	
Address	[redacted]	
Postcode	[redacted]	
Telephone	[redacted]	
E-mail address	[redacted]	

*If an agent is appointed, please provide the full contact details of the agent plus the person (title, name) or organisation they are acting for.

Part A: About You…	
3. Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	
[redacted]	
[redacted]	
[redacted]	
Other - please state what your specific interest in west London might be.	Response on Behalf of the Port of London Authority (PLA). The PLA is the Statutory Harbour Authority for the Tidal Thames between Teddington and the Thames Estuary (which includes the London Boroughs of Hounslow and Richmond Upon Thames). Its statutory functions include responsibility for conservancy, dredging, maintaining the public navigation and controlling vessel movement's and its consent is required for the carrying out of all works and dredging in the river and the provision of moorings. The PLAs functions also include for the promotion of the use of the river as an important strategic transport corridor to London.

Data protection

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Part B: Your Detailed Response			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
If you have more detailed comments to make on what the Plan should contain, please download the form, Part B– Additional Responses Continued, or print additional versions of this form, being clear about page numbers, paragraphs or infographics to which they apply, and append to your response form.			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☐	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Site no./ name (see Appendices to the Plan)	
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		

5. Do you consider the West London Waste Plan is:		
5.1 Legally compliant	Yes ☒	No ☐
5.2 Sound	Yes ☒	No ☐

Further information on these terms is included within the guidance note and answers to Frequently Asked Questions available on the website at https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.

Thank you for consulting the Port of London Authority (PLA) on the Regulation 19 draft West London Waste Plan. I have now had the opportunity to review the draft plan and can confirm the PLA has no comments to make on the draft document.

We regard to the draft plan, support the references to the promotion and use of sustainable waste transport including via rail and water freight, to reduce road-miles, by safeguarding railheads and wharves in waste use.

In addition, welcome reference to the references in the NPPF to the Agent of Change principle, to protect the ongoing operation of safeguarded waste sites so that any sensitive receptors or potentially incompatible developments in proximity to safeguarded waste sites will not constrain the waste site's current and future operation or capacity, including through incorporating appropriate mitigation as part of the design.

Please continue on a separate sheet / expand box if necessary.

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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Signature:	Michael Atkins	Date:	28th September 2026
For electronic responses a typed signature is acceptable.			

Consultation on the Proposed Submission West London Waste Plan

From 4th August to 28th September 2026

RESPONSE FORM

The London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond-upon-Thames and the Old Oak and Park Royal Development Corporation are inviting comments on the Proposed Submission West London Waste Plan (WLWP).

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Part A: Personal Details		
	1. Personal Details *	**2. Agent's Details (if applicable)**
Title		Mr
First name		Jack
Last name		Clemance
Job title (where relevant)		[redacted]
Organisation (where relevant)	Quattro (UK) Ltd	Firstplan Ltd
Address	[redacted] [redacted]	[redacted] [redacted] [redacted]
Postcode	[redacted]	[redacted]
Telephone		[redacted]
E-mail address		[redacted]

*If an agent is appointed, please provide the full contact details of the agent plus the person (title, name) or organisation they are acting for.

Part A: About You…	
3. Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	
[redacted]	
[redacted]	
[redacted]	
Other - please state what your specific interest in west London might be.	

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Documents		**Sections**	
Proposed Submission West London Waste Plan	☐	Page number(s)	WLWP Strategic Objective 1
		Paragraph number(s)	
		Policy no./name	Policy WLWP 1
		Site no./ name (see Appendices to the Plan)	Appendix 2: Site No. E07 Appendix 3: Site No. E07
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐		

5. Do you consider the West London Waste Plan is:		
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Quattro operate the site at No. 307 Horn Lane (WLWP Site Ref: E07) as a waste transfer station. It is located immediately east of Horn Lane and north of Acton Goods Yard within which Quattro also operate a rail served facility. The site is operated in accordance with a Certificate of Lawfulness (ref: 18302/6).

The site manages CDEW and HIC waste streams up to a maximum throughput of 17,000tpa as limited by the Environmental Permit secured at the site. The site is currently operating at maximum capacity and Quattro is in discussions with the Environment Agency in addition to the Hounslow Planning Team via a pre-application advice request with regard to increasing the amount of waste able to be managed.

The Submission WLWP is in particular supported in respect to:

- **WLWP Strategic Objective 1** – seeks to safeguard existing waste sites whilst encouraging development to improve efficiency and throughput, co-location with other waste uses and accordance with the agent of change principle.
- **Policy WLWP 1 Safeguarding and Optimising the Waste Site Network** – is supported in terms of achieving its intended approach of protecting, enhancing and optimising existing waste sites.
- **Appendix 2: Safeguarded Waste Sites - Site Allocation E07 'Horn Lane Waste Transfer Station'** – is supported in that it identifies the Quattro Horn Lane Site as a Safeguarded Waste Site.
- **Appendix 3: Maps of Safeguarded Waste Sites – Site Ref: E07 'Horn Lane Waste Transfer Station'** – is supported by way of mapping of the Quattro Horn Lane Site.

Please continue on a separate sheet / expand box if necessary.

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Signature:	Jack Clemance (Firstplan Ltd)	Date:	28.09.26
For electronic responses a typed signature is acceptable.			

Consultation on the Proposed Submission West London Waste Plan

From 4th August to 28th September 2026

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Part A: Personal Details		
	1. Personal Details *	**2. Agent's Details (if applicable)**
Title		Mr
First name		Jack
Last name		Clemance
Job title (where relevant)		[redacted]
Organisation (where relevant)	Quattro (UK) Ltd	Firstplan Ltd
Address	[redacted]	[redacted]
Postcode	[redacted]	[redacted]
Telephone		[redacted]
E-mail address		[redacted]

*If an agent is appointed, please provide the full contact details of the agent plus the person (title, name) or organisation they are acting for.

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Documents		**Sections**	
Proposed Submission West London Waste Plan	☐	Page number(s)	WLWP Vision – Page 43-44 WLWP Strategic Objective 1 – Page 45
		Paragraph number(s)	
		Policy no./name	WLWP Policy 1 WLWP Policy 2
		Site no./ name (see Appendices to the Plan)	Appendix 2 Site No. H02 Appendix 3 Site No. H02
		Maps	
		Tables	
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5.1 Legally compliant	Yes ☒	No ☐
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Please refer to full response prepared by Firstplan (Ref: 24394/VW/JC), dated 28.09.2026 – Section 4.

Please continue on a separate sheet / expand box if necessary.

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.*

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐ **No**, I do not wish to participate in hearing session(s)	☒ **Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Due to the key issues raised in terms of the safeguarding, implications and relevant considerations this raises in the context of NPPF and London Plan requirements it is considered essential that Quattro have the opportunity to fully address matters of 'soundness' they have raised at the Oral Hearings.

10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the West London Waste Plan.

If you do not wish to be notified of future updates on the West London Waste Plan, then please tick this box, complete Part A: Personal Details of this form and return it to us. Note your name, business (if entered) and response will still be published in the consultation report.			☐
Signature:	Jack Clemance (Firstplan Ltd)	Date:	28.09.26
For electronic responses a typed signature is acceptable.			

RESPONSE BY QUATTRO – SOUTHALL LANE

WEST LONDON WASTE PLAN SUBMISSION VERSION CONSULTATION (REG 19)

28 SEPTEMBER 2026

FIRSTPLAN

DOCUMENT CONTROL

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SECTION 1 | INTRODUCTION

1.1 We are instructed by our client, Quattro (UK) Ltd ('Quattro'), to provide the following response to the Regulation 19 Proposed Submission West London Waste Plan ('Submission WLWP') Consultation (August – September 2026). Firstplan, again on behalf of Quattro, previously responded to the Regulation 18 Draft West London Waste Plan, by letter dated 05 February 2026.

1.2 This response to the Submission WLWP identifies areas of support and a limited number of objections and modifications required to address these. These are to ensure that the Plan is clear and unambiguous in its approach which is in particular regard to safeguarded waste sites subject to time limited consents and to ensure on this basis that the Plan is justified, effective, consistent with National Policy and able to be found sound. Required modifications to address the specific issues raised have been set out in full.

1.3 Because of the nature of the response made, and the need to provide background information, it was considered helpful to provide the response to the consultation in a consolidated format within this statement. For ease of reference this carries over the background information provided at Regulation 18 Stage and updated as relevant. The application forms (which accompany this submission) have been completed as applicable to cross refer to the sections of the draft WLWP as commented on within this response.

SECTION 2 | QUATTRO OPERATIONS OVERVIEW

2.1 Quattro is a highly experienced operator in the waste and construction industry providing services to the construction, utilities, demolition and recycling industries; covering the following sectors:

- Waste Management and Recycling;
- Supply of Ready Mixed Concrete;
- Primary and Secondary Aggregate Supply;
- Land Remediation and Agriculture Services;
- Haulage; and
- Plant Hire.

2.2 Quattro has been operating since 1992 and directly employs over 132 people at operational sites including sites at Southall (LB Hounslow) and at Acton (LB Ealing) within the WLWP area in as well as a site in Gerrards Cross.

2.3 This response provides further information in respect of the nature and status of Quattro's operations, challenges being faced and potential opportunities.

a) Quattro Southall Lane

2.4 Quattro's land interest and operations at Southall consist of two neighbouring sites. Both sites are owned by Hounslow Council and leased from them by Quattro. Both sites are accessed from Southall Lane. These are for the purposes of this response referenced as the 'Quattro Waste Site' and 'Quattro Quarry Site' and are as identified at Figure 1.

Figure 1: Annotated Aerial Map of Quattro Sites (Southall Lane).



i) Quattro Waste Site

2.5 The Quattro Waste Site is located at: Land Forming Part of Former Western International Market, Southall Lane, Southall, UB2 5AG. It is occupied by a C&D waste recycling facility and a co-located concrete batching plant ('CBP').

2.6 The Quattro Waste Site is operated in accordance with planning permission ref: 01032/E/P48 granted on 18 January 2018 (as amended by planning permission ref: 01032/E/P48/NMA granted 2 February 2022). The planning permission allowed for a waste recycling facility and concrete batching plant together with fleet parking and associated development. An extract of the approved Site Layout Plan is provided at Figure 2.

Figure 2: Extract of Approved Site Layout Plan Ref: H11930-11 Rev U (01032/E/P48/NMA)



2.7 Critically this comprises a time limited permission which requires under Condition 1 that: *"the buildings and plant equipment and use of the land to cease use and be removed on or before 21 December 2027 and the land restored to an undeveloped form or in accordance with another scheme of work submitted to and approved in writing by the Local Planning Authority".* The reason for this condition is stated as follows: *"The use of the sites as Construction Waste Recycling and Concrete Batching on a permanent basis would prejudice the proposal in the Local Plan that the site be developed for Municipal Waste and therefore ensuring that the land is available for its allocated uses within the Development Plan, specifically the West London Waste Plan 2015.*

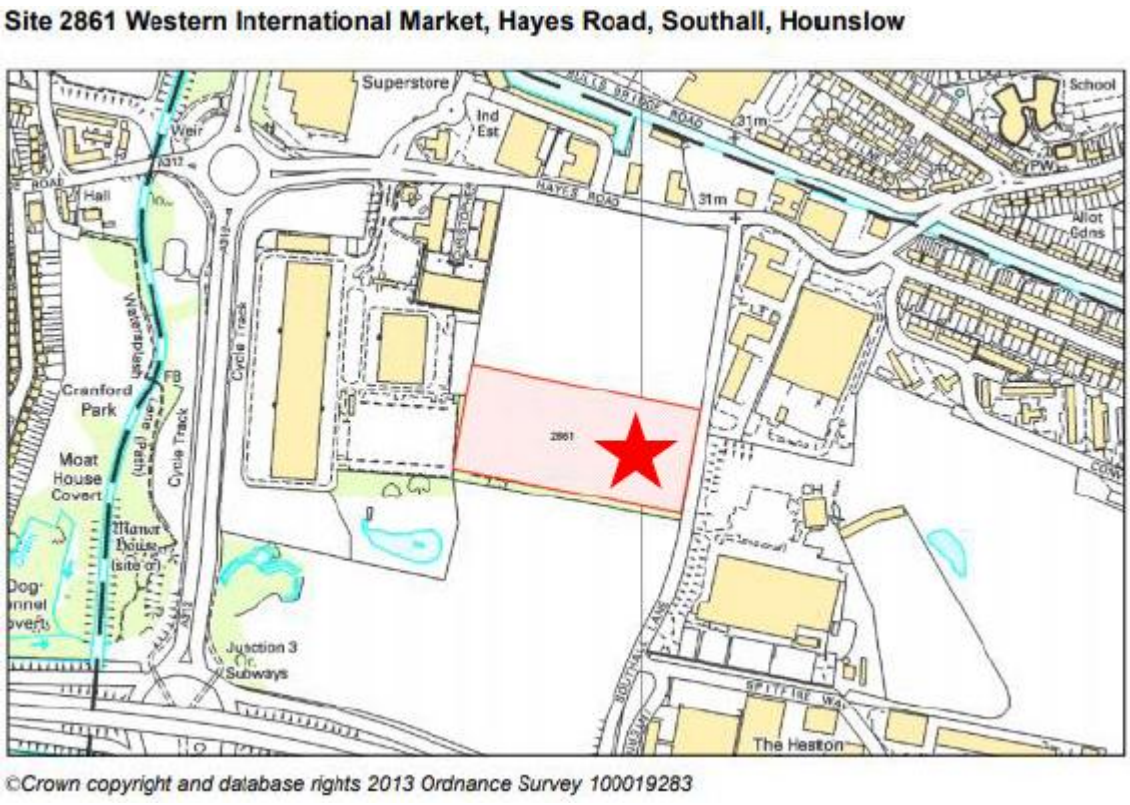
2.8 It is noted that the WLWA consultee response to the application was on the basis of: 'No objections provided site can be made available for Municipal Waste Use by the WLWA if required.'

2.9 It is confirmed in respect of the waste element of the operation that the plant as assessed and erected can import and process up to 150,000 tonnes of C, D and E waste per year. Further, Quattro have secured an Environmental Permit with the Environment Agency to allow for this level of waste management.

2.10 The site also accommodates a co-located Concrete Batching Plant ('CBP') producing in the region of 65,000m3 of ready mixed concrete per year. To support this level of concrete production in the region of 130,000 tonnes of sand and stone is required per year and some 19,500 tonnes of cement. However, due to its co-location with the C&D waste recycling facility this is able to supply the CBP with 15% of its requirement for aggregate in the form of recycled aggregate, and amounting to some 19,500 tonnes of material per year. The CBP comprises a highly sustainable an entirely complementary operation to the waste operation.

2.11 The Quattro Waste Site is currently allocated within the adopted West London Waste Plan ('Adopted WLWP') (July 2015) under Site Ref: 2861. This jointly covers the adjoining Hounslow operated Household Waste Facility and the existing Quattro Waste Site comprising an area of 3.2ha. Site Ref 2861 is detailed as: "Western International Market, allocated for waste management uses". This status safeguards use of the site for purposes of managing the Council's apportioned waste targets as an 'Additional Site with opportunity for developing waste facilities'. For ease of reference the allocated site as identified at Appendix 6 of the Adopted WLWP is provided at Figure 3.

Figure 3: Extract from Appendix 6, Adopted WLWP, 2015 (Quattro waste/CBP site indicatively identified by a red star)



2.12 During the course of Pre-App for the original planning applications for this site and then consideration of the subsequent applications it was agreed by Hounslow and the WLWA that the site could be occupied by Quattro until such time as the site was required for its apportioned waste use. As noted the current permission allows for Quattro's current operations to remain on site until December 2027. It is noted that one of the reasons the Quattro operation was considered to be acceptable in this location was on the basis that whilst it did not comprise an 'apportioned' waste use it did nonetheless comprise a waste use and a co-located CBP which utilises some of the recycled material from the adjoining waste recycling plant.

2.13 Another factor supporting Quattro's operation at the Quattro Waste Site was the fact that at the time the original application was made Quattro were being forced to vacate their former premises at Lionel Road South, Brentford, TW8 0JA. This was as a result of the Compulsory Purchase Order ('CPO') in respect of the Brentford Football Club stadium redevelopment. Whilst investigating potential permanent relocation opportunities for their C & D waste recycling facility at Lionel Road, Quattro were offered a lease at the Quattro Waste Site to assist

them on a temporary basis. A permanent relocation to this site could not be provided by Hounslow Council given the safeguarding of the site for apportioned waste use. Quattro were originally offered a temporary three year lease to January 2021 however this was extended by another 6 years to December 2027(commensurate with the temporary planning permission now in place). Quattro are therefore actively looking for opportunities to either retain the operation at the site for a further temporary basis to allow them time to secure alternative premises which given the timeframe involved is becoming increasingly urgent.

2.14 As detailed in the context of details provided below in respect of the Quattro Quarry Site located immediately to the south of the Quattro Waste Site – one key option being considered is relocation to the Quarry Site. Either way it is fully envisaged that at minimum some limited additional temporary period of operation beyond December 2027 will be required for the existing waste and CBP operations. **On this basis it should be assumed that at minimum an application will be forthcoming in the short-term for a further temporary period of operation for the Quattro Waste site at Southall Lane beyond December 2027.**

ii) Quattro Quarry Site

2.15 Quattro also operate from land to the south of the Quattro Waste Site for mineral extraction. Again this land is in the ownership of Hounslow Council and is leased from them by Quattro. The site, referenced as the Quattro Quarry Site in this response, is located at: Land South of Western International Market, Southall Lane, UB2 5XJ.

2.16 The Quattro Quarry site extends to 14.3 hectares and is bounded by Southall Lane to the east, the M4 to the south, the Parkway (A132) to the west and the Western International Market / Hounslow Waste Recycling Centre / Quattro Waste Site to the north. This Site is currently being operated by Quattro pursuant to planning permission ref: 01032/E/P50 (granted on 3 April 2024) for the extraction of sand and gravel, importation of recycling and secondary aggregate including the installation and operation of an aggregate processing plant with ancillary buildings and associated parking, including the creation of a new vehicular access and progressive restoration to agricultural land. As part of permission ref: 01032/E/P50, the site will undergo a phased extraction process with a works compound containing plant equipment and admin / parking facilities located to the north east of the site. Anticipated timescales for the completion of the mineral extraction is circa 15 years.

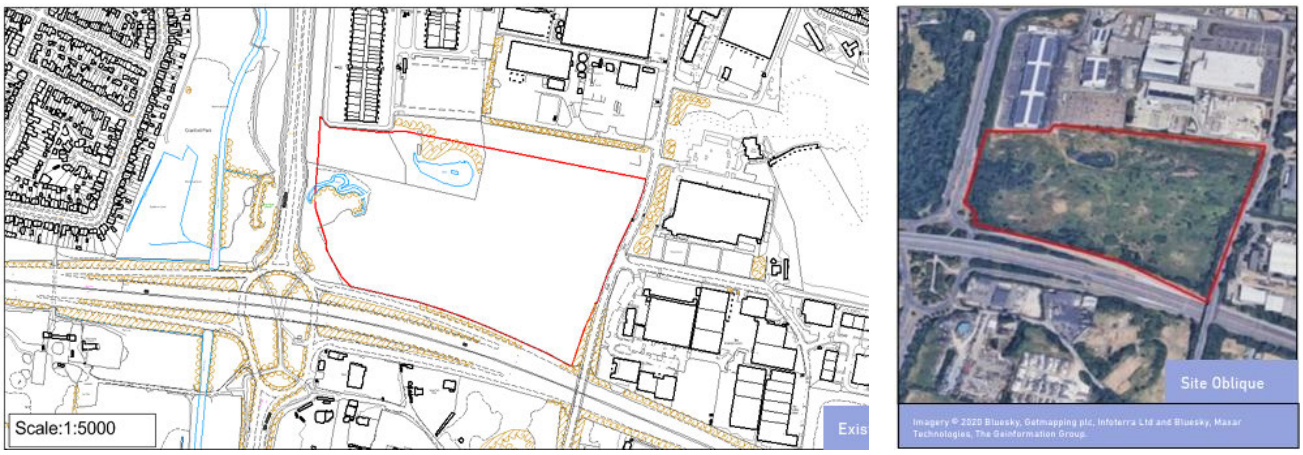
2.17 This site is not currently identified in any form in the Adopted WLWP. Within the Adopted Hounslow Local Plan (Adopted 2015) it currently comprises land designated as Green Belt. However within the emerging Draft Hounslow Local Plan (Proposed Submission Version, July 2024) it is proposed to release this site from the Green Belt and allocate it as a 'Locally Significant Industrial Site' ('LSIS'). The Draft Local Plan is at an advanced stage with the EIP Hearing Sessions having been completed and the Council addressing several action ahead of the inspectors report. It is understood that no objection has been made in respect of the proposed release of this site from Green Belt nor to its proposed designation as LSIS, and site specific allocation. Given the advanced stage of the Local Plan review this proposal now carries some weight. At this stage, it is reasonably expected to be carried through to Adoption. Notwithstanding, that EIP process is of course still on going and an Adopted Plan is not expected until at least the end of 2026.

2.18 It is noted that within the emerging Hounslow Local Plan, Chapter 12, Site Allocations, Site Ref: 77 'Land South of Western International Market' comprises the Quattro Quarry site. The proposed Site Allocation confirms the 'Key Proposal' to be: "Land South West of Western International Market will be utilised for mineral extraction, with redevelopment to industrial uses in the long term'. Similarly, the 'Land Uses' are identified as: 'Mineral Extraction followed by industrial (B2/B8)'. The proposed Site Allocation area is reproduced at Figure 4.

2.19 In this context it is noted that Submission WLWP Policy 2, Provision of Additional Waste Management Capacity, in terms of Locational Criteria Part (C), confirms that proposals for waste capacity will be supported in principle where, amongst other things: *"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".

Figure 4: Extract from Draft Hounslow Local Plan, Submission Version (July 2024), Site Allocation 77 – Land South of Western International Market



iii) Relocation Proposals

2.20 As detailed, the Quattro Waste Site currently only has the benefit of temporary planning permission and as things currently stand will need to be cleared and vacated by December 2027. It is further confirmed that Quattro continue to experience difficulties in terms of securing a permanent relocation site for their established operations. Noting again, that the uses located on the Quattro Waste Site were themselves displaced from their Brentford site. Given the timeframes involved and likely need to secure planning permission for any relocation site with the current permission due to expire in December 2027 it is becoming increasingly urgent that a solution is found.

2.21 In this regard, Quattro have progressed initial exploratory discussions with LB Hounslow Property Team who own the freehold of both the Quattro Waste and Quarry Sites. This is to review the potential for the continued occupation of the Quattro Waste Site on either a temporary or permanent basis and/or the potential of relocation to the Quattro Quarry Site in accordance with the emerging Hounslow Local Plan position. At this stage and in broad terms the Hounslow Property team have indicated that:

- Hounslow Property support Quattro as a tenant and would support their continued operation in the Southall area over the long term.
- Hounslow Property do not currently identify any urgent need for other waste uses to be accommodated at the Quattro Waste Site (draft WLWP Proposed Site Ref HO02). Albeit Hounslow Property cannot rule out that the Quattro Waste site may be needed by the Council at some point in the future.
- That Hounslow Property would support relocation of the Quattro Waste Site operation over to the Quattro Quarry Site with a further temporary lease granted at the Quattro Waste Site to allow for this transition. A period of five years has initially been suggested (i.e. to December 2032).

2.22 Quattro have since also progressed a pre-application advice request with the Hounslow Planning Team with the purpose of considering prospects for a further temporary period of time for continued operation of the existing C&D Recycling and CBP plant at the existing Waste Site. Advice is currently still to be provided however subject to this it is likely a planning application will follow and having regard both to the end date of the current temporary permission. Work is progressing in terms of preparing a Pre-App for relocation of some or all of the existing activities on the Waste Site to the Quarry site having regard to the progress towards adoption of the emerging Hounslow Local Plan.

2.23 It is in this context that a response is made to the Submission WLWP which continues to propose a free standing allocation for the Quattro Site under draft WLWP Site Ref: HO02. As detailed further below, and as was confirmed at Regulation 18 Stage, this is supported albeit with further clarification sought that safeguarding would continue to apply to any further temporary period of operation which may be secured (and as identified is highly likely to be required) and that there is support of complementary uses at safeguarded waste sites.

SECTION 3 | PLANNING POLICY CONTEXT

3.1 In the context of the specific policy requirements that feed into the matters raised by this response the following is highlighted.

a) National Planning Policy Framework (2024)

3.2 At national level, there is clear policy support and direction in the National Planning Policy Framework (NPPF, 2024) with regards to ensuring that uses and operations such as those taking place by Quattro are appropriately safeguarded and with regard to agent of change considerations.

3.3 Paragraph 200 is clear in its requirements that:

> *"Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."*

3.4 Paragraph 85 of the NPPF, in the context of 'building a strong, competitive economy (Section 6), is clear that planning policies should:

> *"…help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development".*

3.5 In terms of 'Plan Making' the following considerations are of particular relevance:

- **Para 16 (a)** – requires that plans should be prepared with the objective of contributing to the achievement of sustainable development.
- **Para 16 (d)** – confirms that plans should contain policies that are clearly written and unambiguous, so it is evident how decision makers should react to development proposals.

b) National Planning Policy for Waste (2014)

3.6 National Planning Policy for Waste (NPPW) sets out detailed waste planning policies and should be read in conjunction with the NPPF. In terms of plan making the NPW requires at paragraph 4 (amongst other things) that waste planning authorities should:

> *"consider a broad range of locations including industrial sites, looking for opportunities to co-locate waste management facilities together and with complementary activities…."*

c) National Planning Policy Framework (August 2026)

3.7 A new NPPF was published on 17 August 2026. The NPPF 2026 provides transitional arrangements for plans at different stages of preparation. This identifies at Annex A those plans which should be produced in accordance with this Framework. Any other plans should be produced in accordance with the version of this

Framework as published in December 2024, unless the transitional arrangements in Annex 1 to that Framework apply. The WLWP Regulation 19 Submission Plan is being prepared under the legacy plan-making system and accordingly falls within this transitional provision. The soundness of the WLWP should therefore be assessed against the Framework as published in December 2024. Relevant considerations from which are as set out above.

3.8 The national decision-making policies in the NPPF 2026 apply from 17 August 2026 and will be a material consideration in the determination of planning applications, alongside the development plan and other material considerations. It is considered that the matters and issues as identified in the context of safeguarding in these representations are reinforced by the immediate decision-making policies of the NPPF 2026.

d) London Plan

3.9 The key London Plan policies relevant to the consideration of the Quattro sites and operations subject to this response are detailed as follows and are critical to how the Submission WLWP should approach this site.

3.10 The London Plan expressly requires the safeguarding of sites such as the Quattro Southall site. This is both in terms of in Development Plans and in decision making and in particular under Policy 'SI8 'Waste Capacity and net waste self-sufficiency'.

3.11 Policy SI8(A) confirms that existing waste management sites should be safeguarded and their waste management capacity optimised.

3.12 Policy D13 'Agent of Change' requires that:

> *"A The Agent of Change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise sensitive development. Boroughs should ensure that Development Plans and planning decisions reflect the Agent of Change principle and take account of existing noise and other nuisance-generating uses in a sensitive manner when new development is proposed nearby.*
>
> *B Development should be designed to ensure that established noise and other nuisance generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.*
>
> *C New noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses."*

3.13 Supporting text at paragraphs 3.13.1 and 3.13.2 are also relevant. Furthermore, supporting paragraph 3.13.6 is clear in confirming that the Agent of Change principle should be applied to all noise-generating uses and activities including:

> *"industrial sites, waste sites, safeguarded wharves, rail and other transport infrastructure."*

e) Hounslow Local Plan

3.14 Hounslow Council's adopted Planning Policies Map accompanying the Hounslow Local Plan Volumes 1 and 2 (2015) designates the Quattro Waste and Quarry Sites as follows:

- Metropolitan Green Belt - Quattro Quarry Site Only
- Safeguarded Minerals Site - Quattro Quarry Site Only

- Advert Special Control Area - Quattro Quarry Site Only
- Archaeological Priority Area - Quattro Quarry and Quattro Waste/CBP Sites

f) Emerging Planning Policy – Hounslow Local Plan

3.15 The London Borough of Hounslow are currently in the process of undertaking a Local Plan Review and preparation of a new single local plan. On 23 June 2025, the draft Hounslow Local Plan 2020-2041 was formally submitted to the Secretary of State for independent examination. The Examination Hearings have now been concluded and the emerging Local Plan is at an advanced stage.

3.16 The Emerging Local Plan Policies Map (Submission Version, July 2024) confirms that the Quattro sites identified in this response have the following proposed land use designations:

- Minerals Allocation (Quattro Quarry Site Only)
- Site Allocation (Quattro Quarry Site Only)
- Locally Significant Industrial Site (Quattro Quarry Site Only)
- Archaeological Priority Area (Quattro Quarry and Waste / CBP Sites)

3.17 Accordingly, the Quattro Quarry Site is proposed to be removed from the Green Belt and replaced with a Locally Significant Industrial Site (LSIS) designation and site specific allocation for industrial development (No. 77).

3.18 The Site Allocation is directly referenced under draft Policy P2 'West of Borough, draft Policy ED 1: Promoting Employment Growth and Development' and draft Policy ED2 'Maintaining the Borough's Employment Land Supply'.

3.19 A summary of Site Allocation (77) is as follows:

- Provides for 34,760 sqm of industrial floorspace with phasing indicated as 2030-2041.
- Key Proposal stated as: 'Land South West of Western International Market will be utilised for mineral extraction, with redevelopment to industrial uses in the long term.'
- Proposed Land Use – 'Minerals Extraction followed by Industrial (B2/B8)'
- Under the heading of 'Site Requirements' – (amongst other things) it is envisaged that minerals extraction should be phased appropriately to enable redevelopment following extraction for industrial uses.

3.20 Draft Policy ED2: Maintaining the Borough's Employment Land Supply - confirms that within LSIS designations, industrial uses (as defined in the London Plan 2021 Policy E4) will be encouraged.

3.21 Supporting paragraph 4.17 states that London Plan Policy E4 lists uses appropriate for industrial land as being light and general industry (use classes E(g) (iii) and B2), storage and logistics / distribution (use class B8), flexible hybrid space (E(g)(iii) / B2 / B8), waste management, utilities infrastructure and other defined uses.

3.22 Hounslow are currently in the process of addressing various actions required by the Inspectors post completion of the hearings with an inspector led consultation to follow to include main modifications proposed.

g) Policy Overview

3.23 The policy position at a local level in subject to imminent change through progression of the emerging Hounslow Local Plan which is nearing completion of examination. Removal of the Quattro Quarry Site at Southall Lane from the Green Belt and replacement with a LSIS designation and industrial site allocation in particular identifies

potential for future waste (amongst other) uses to be located here. The existing Quattro Waste Site at Southall Lane maintains its position as unallocated land within the emerging Hounslow Local Plan, however it is proposed for continued site specific waste site safeguarding the emerging WLWP for a temporary basis in line with its extant planning permission.

3.24 In the context of the key policy considerations identified and the specific policy position of the Quattro sites, several areas of support for the emerging WLWP are set out at Section 4 together with a small number of objections. Required modifications arising from the areas of objection raised are set out at Section 5 of this Statement.

SECTION 4 | AREAS OF SUPPORT AND GROUNDS FOR OBJECTION AND FAILURE TO MEET TESTS OF SOUNDNESS (RESPONSE FORM – PART B Q4-6)

4.1 A review has been undertaken of how the existing Quattro waste site and operations at Southall Lane have been identified both in text / policy form and in terms of mapping in the Submission WLWP as well as the approach to safeguarding of waste sites in more general terms and the WLWP in more overarching terms. In this context key areas of support are identified together with the key points objected to.

a) Areas of Support

4.2 In the context of the specific matters of interest to Quattro related to their existing and proposed waste operations, the following areas of the Submission WLWP are expressly supported and should be retained. These are considered to be integral to ensuring the WLWP is 'sound':

- **WLWP Vision** – which confirms that land to be used for waste management over the next 15 years will focus on the efficient and flexible use of safeguarded waste sites.
- **WLWP Strategic Objective 1** – seeks to safeguard existing waste sites whilst encouraging development to improve efficiency and throughput, co-location with other waste uses and accordance with the agent of change principle.
- **Policy WLWP 1 Safeguarding and Optimising the Waste Site Network** – (Support in Part / Object in Part) –Overall policy approach is supported in terms of achieving its intended approach of protecting, enhancing and optimising existing waste sites. In particular the additional wording/clarification provided in respect of Part (E) in terms of opportunities to co-locate waste uses together with complementary activities with the addition of Footnote 30 confirming "Such as activities that make use of the outputs of associated waste management operations". However, the wording as currently drafted in respect of temporary site safeguarding at Part (C) is objected to as detailed further below in that it too requires further clarification.
- **Policy WLWP 2 Provision of Additional Waste Management Capacity** – is supported particularly in relation to the in principle support for C, D & E Waste uses at Part (B). Also the 'Locational Criteria' under Part (C) and as detailed in terms of the applicable criteria determining where proposals for waste capacity will be supported – with particular regard to that including areas designated as LSIS.
- **Appendix 2: Safeguarded Waste Sites - Site Allocation HO02 'Southall Lane Western International Market'** – (Support in Part / Object in Part) – is supported in that it identifies the Quattro Waste site individually as a Safeguarded Waste Site. Quattro also fully support the recognition that the site manages CDEW waste and the inclusion of CDEW in terms of 'waste type manged'. However, Site Allocation HO02 is objected to as detailed further below on the basis that the '"Assessed Capacity" figure has been incorrectly stated at 64,347 tpa.
- **Appendix 3: Maps of Safeguarded Waste Sites – Site Ref: HO02 'Quattro Site Southall'** – is supported in terms of correctly mapping and identifying the Quattro Waste Site at Southall Lane.

4.3 Should any material change be made to those parts of the Submission WLWP which have been expressly supported above we reserve the right to comment further at subsequent stages of the WLWP review process. The matters identified above are essential to ensuring the Plan is sound particularly in the context of consistency with the NPPF, NPW and general conformity with London Plan requirements.

b) Points of Objections

4.4 The following identifies points of objection to the WLWP which are considered to result in the Submission WLWP not being 'sound'. Proposed modifications to address the matters raised are provided at Section 5 of this Statement.

i) WLWP Policy 1 'Safeguarding Existing Waste Sites'

4.5 WLWP Policy 1 confirms that waste management sites in West London will be safeguarded for their identified waste use unless otherwise identified for release. However, Part C of WLWP Policy 1 confirms that:

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

4.6 Details have already been provided of the current time limited permission for the Quattro Waste Site (Proposed Site Ref HO2). In the context of the requirement of Policy WLWP1 Part (C) it is noted that Footnote 51 to Appendix 1 of the supporting BPP Consulting Assessment of Existing Waste Capacity in West London 2020 Report (July 2026) in referencing Site Ref: HO2 states:

> *"Site subject to temporary planning permission expiring in 2027 so site is only proposed to be safeguarded through updated WLWP to that date. "*

4.7 It can only be assumed that Policy WLWP1 Part (c) should be read on the basis that if a temporary permission is extended that similarly the waste safeguarding under this part of the policy would similarly be extended. Clearly, if permanent permission were to be granted that the site would then fall to be safeguarded under Part (B) of the policy. It must be good planning practice, and the 'sound' approach that the WLWP be clear that the safeguarding would continue to have effect in these circumstances. Lack of clarity and ambiguity is not consistent with NPPF requirements and has the potential to undermine the effectiveness of the policy and therefore the Plan.

4.8 This point was raised as part of the Quattro Regulation 18 representations to which the WLWP Authority response contained in the Consultation Statement (May 2026) (page 25) stated that:

> *"No change proposed. It is considered that this matter is already addressed through part (B) of Policy WLWP 1, which supports the continued safeguarding of existing waste sites and capacity and is in general conformity with the approach set out in the London Plan 2021. No modification is therefore considered necessary"*

4.9 In response to a similar point raised by Quattro specifically in the context of the Site Safeguarding details for HO02 the response was as follows (page 41)

> *"No change proposed. WLWP1 Clause C is generic to time - limited i.e. non specific so will continue to apply all the time a use is subject to a temporary permission. In the event of permanent permission being granted then the site would revert to being safeguarded solely under Clause B of WLWP 1."*

4.10 Again, there is nothing to suggest here anything other than if a temporary waste permission is extended that it will be continued to be safeguarded. However, the issue remains that this is not expressly stated either in the Policy itself by way of a footnote or in supporting text. In this context it is considered that a modification is warranted and required to support the overall objective of safeguarding such sites and to ensure the Plan is sound.

4.11 In the context specifically of the Quattro Southall Lane site the intent here is to be absolutely clear that the site will benefit from waste safeguarding should the current temporary permission be extended beyond December 2027, as is likely to be applied for. The Site has no other site designations (SIL, LSIS or other) – and any suggestion that the safeguarded status could be lost would mean that the site would not benefit from protective provisions which Policy WLWP 1, Part (I) imparts in terms of neighbouring development.

ii) Appendix 2: Site Allocation Ref: HO2 Southall Lane Western International Market (Quattro Waste Site)

4.12 Within the Submission Draft WLWP the Quattro Waste Site is now identified individually as a new free standing Safeguarded Waste Site allocation (Site Ref: HO2) and separate to Safeguarded Waste Site Allocation for the adjoining Household Waste Recycling Facility now comprising Site Ref: HO11 (in the currently adopted WLWP they are jointly allocated as one site).

4.13 As identified in the Quattro Regulation 18 response the 'Assessed Capacity' for Site HO2 is incorrectly stated as 64,347 tpa. As per the previous response made, this is understood to be based on the recent operation of the site. However, this figure does not reflect that under the terms of planning permission ref: 01032/E/P48 (as amended by ref: 01032/E/P48/NMA) the site has been assessed on the basis of managing up to 150,000tpa and through grant of planning permission, confirmed as acceptable. Quattro have also secured an Environmental Permit with the Environment Agency for management of 150,000tpa.

4.14 In direct response to the Quattro Regulation 18 Representation as detailed above, the Consultation Statement (May 2026) (page 41) in response to the representation summarised by the WLWA as "Confirm assessed capacity is up to 150,000 tpa)" the response from the WLWA was as follows:

"Change Proposed - Capacity assessment values adjusted to reflect feedback"

4.15 On the basis of the above it can only be assumed that the capacity figure of 64,347tpa has been retained my mistake and should have been updated to 150,000 tpa. Clearly, the capacity assessment value should be corrected to ensure the Plan is consistent with NPPF requirements that the preparation and review of all polices should be underpinned by relevant and up-to-date evidence (para 32). The Operator of the site in this instance having provided the most up to date evidence at Regulation 18 stage and again through this response.

c) Failure to Meet Tests of Soundness

4.16 The points of objection raised in this response are considered to fail to meet the tests of soundness for the following reasons:

i) The Plan is not 'Justified'

- The policy approach of not clarifying clearly how safeguarding of waste sites subject to a time limited consent applies and for not correctly stating the assessed capacity of a site is not an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
- The WLWPA Consultation Statement appears to indicate agreement that a change was needed at least in terms of the assessed capacity point but has not progressed that change.

ii) The Plan is not 'Effective'

- The lack of clarity and ambiguity in terms of safeguarding of waste sites subject to time limited consents points to the conclusion that the Plan would not be effective in this respect.

iii) The Plan is not 'Consistent with National Policy' and not in 'Conformity with the London Plan'

- The Plan is not consistent with NPPF requirements that plans should be prepared with the objective of contributing to the achievement of sustainable development (Para 16 (a)).
- The Plan is not consistent with NPPF requirements that Plans should contain policies that are clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals (para 16 (d)). Similarly the lack of a clear and unambiguous policy in respect of safeguarding of waste sites subject to time limited consents results in the Submission WLWP not being consistent with the requirement that policies should help create the conditions in which businesses can invest, expand and adapt (para 85);
- The Plan is not consistent with NPPF requirements that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence (para 32). This is in the context of the up to date evidence provided by an operator of a waste site which has not be reflected in the assessed capacity stated for Site HO2.

SECTION 5 | REQUIRED MODIFICATIONS (RESPONSE FORM – PART B Q7)

5.1 In light of the background information provided and specific area of objection identified the following modifications are required to the Submission WLWP:

a) WLWP Policy 1 'Safeguarding Existing Waste Sites'

5.2 Policy WLWP 1: Safeguarding Existing Waste Sites, Part (c) should be clarified by means of the addition of a footnote as follows:

"[x] The safeguarding will continue to apply should any additional temporary period of operation be permitted. In the event of permanent permission being granted then the site would revert to being safeguarded solely under Clause B of WLWP 1."

5.3 The same objective could be achieved by the suggested footnote text being provided as part of the supporting / explanatory text to Policy WLWP 1.

b) Appendix 2: Site Allocation Ref: HO2 Southall Lane Western International Market (Quattro Waste Site)

5.4 The assessed capacity for Site Ref: HO2 should be amended to state: 150,000 tpa.

SECTION 6 | CONCLUSIONS

6.1 Firstplan have been instructed by Quattro to provide this response to the Submission WLWP. This response identifies changes required to ensure the plan is justified, effective and consistent with national policy.

6.2 From the Consultation Statement it would appear that one of the issues previously raised at Regulation 18 stage generated a response identifying 'Change proposed'. However, that does not appear to have translated through to Regulation 19 stage and is potentially simply an omission. Either way, Quattro would be keen to engage early with the WLWA to review the required modifications which have been proposed ahead of the submission of the WLWP.

6.3 We would be grateful if you could confirm receipt of these representations and confirmation that they have been duly made. We would request that we be kept updated on the progress of the emerging Waste Plan and any future consultation. Should any further information / clarification be required, we would of course be very happy to provide that.

FIRSTPLAN

wlwasteplan

From: Calli Yau [redacted]
Sent: 26 August 2026 17:29
To: wlwasteplan
Cc: [redacted]
Subject: Re: West London Waste Plan Consultation

WARNING : This Message has originated from outside your organization, If you do not trust this email please either delete or follow the guidance on OneSpace.

Good afternoon

Thank you for consulting Rotherham Metropolitan Borough Council. We have reviewed the documents and can confirm that we have no comments to make at this stage.

The Plan identifies only limited waste exports to Rotherham, primarily comprising wood waste, and does not recognise Rotherham or the wider South Yorkshire area as a strategically significant destination for waste management. There is also no identified dependency on existing or proposed waste management capacity within South Yorkshire. On this basis, the Council has not identified any significant cross-boundary waste planning matters that would affect Rotherham.

Kind Regards

Calli Yau
[redacted]
Rotherham Metropolitan Borough Council
[redacted]

Visit our website: http://www.rotherham.gov.uk

From: wlwasteplan <wlwasteplan@ealing.gov.uk>
Sent: 03 August 2026 18:05
To: Planning, Policy [redacted]
Subject: West London Waste Plan Consultation

You don't often get email from wlwasteplan@ealing.gov.uk. Learn why this is important

Dear Stakeholder,

We are writing to inform you that the West London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames, together with the Old Oak and Park Royal Development Corporation (OPDC), are publishing the Proposed Submission version of the West London Waste Plan (WLWP) for comment.

This important document sets out the proposed planning strategy for waste management for these authorities up to 2041 and includes policies that are proposed to be used when assessing

planning applications related to waste management development. It also identifies sites proposed to be safeguarded for waste use.

The WLWP aims to provide an up to date, sound and effective planning strategy for waste management in accordance with national policy, the London Plan, and local priorities. We consulted previously on a draft updated West London Waste Plan and the comments received have helped shape the Proposed Submission version. If adopted, the updated West London Waste Plan would replace the current 2015 WLWP.

Please note you may have received this notification more than once from different authorities – you only need to respond once as all responses will be collated.

This is the final opportunity to comment before the documents are submitted to the Secretary of State for Examination, the west London boroughs and OPDC invite representations on whether the Proposed Submission WLWP is 'sound' and 'legally compliant', including whether it is in general conformity with the London Plan. Please visit **haveyoursay.ealing.gov.uk/projects/wlwp-consultation** to find out more about the Plan and answers to some frequently asked questions.

How can I view and comment on the documents?

Ealing Council is hosting the consultation on their online portal, on behalf of the other planning authorities involved. You can view the Proposed Submission WLWP and its supporting documents, including the Integrated Impact Assessment and Habitats Regulations Assessment, via Ealing Council's online consultation portal: **haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation.** The Statement of Representations Procedure and Statement of Fact' can be accessed with the above link. Reference copies of the Proposed Submission WLWP are also publicly available for inspection at various libraries and offices listed on the online consultation portal - more details are in the 'Statement of Representations Procedure and Statement of Fact'.

The publication period closes on **Monday 28th September** (23:59). You are invited to provide feedback on the Proposed Submission WLWP and the supporting documents. You can submit your comments to us in writing by any of the following methods:

- Complete an online questionnaire on Ealing Council's online consultation portal using the above website.
- Email your completed response form to wlwasteplan@ealing.gov.uk. A PDF and a Word version of the form can be found at haveyoursay.ealing.gov.uk/projects/wlwp-consultation. In the Word version, you can type in your response and return it as an email attachment.

- Complete and post printed copies of the response form to the address given below. Printed copies are available at the selected locations listed on the consultation portal.
    - Post written responses to:
      Planning and Infrastructure
      West London Alliance
      Ealing Council
      5th Floor, Perceval House
      14-16 Uxbridge Road
      Ealing, W5 2HL
- Email responses to: wlwasteplan@ealing.gov.uk

If you have any questions about the consultation, or need the documents in an alternative format, please contact the WLWP Project Manager, wlwasteplan@ealing.gov.uk

Following the completion of the publication process, all responses received will be submitted to the Government with the WLWP and other supporting documents, for examination by an independent planning inspector. Please note that your response will not be treated as confidential and any anonymous responses will not be accepted. Responses to this consultation will be published, with any personal contact details redacted in accordance with general data protection principles.

The authorities are committed to ensuring that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure. If you submit comments, your consultation responses and personal data will be passed to the Planning Inspectorate and a Programme Officer. The Privacy Statement is published on the webpage https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation. We hope that you or your organisation will continue to take an interest in the progression of the West London Waste Plan. If, however, you would prefer not to receive notifications, you can let us know.

Yours faithfully,

The West London Waste Planning Team
On behalf of the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond upon Thames and the Old Oak and Park Royal Development Corporation.



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Please consider the environment before printing this email.

The content of this email and any attachment transmitted within are confidential and may be privileged. If you are not the intended recipient and have received this email in error, please notify the sender and delete this message along with any attachments immediately. Unauthorised usage, disclosure, copying or forwarding of this email, its content and/or any attachments is strictly forbidden.

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The information in this e-mail is confidential and intended solely for the use of the individual to whom it was addressed. If you are not the intended recipient, be advised that you have received this e-mail in error and that any use, dissemination, forwarding, printing or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please advise the sender by using the reply facility in your e-mail software, and then delete it from your system. Rotherham MBC may monitor the content of the e-mails sent and received via its network for the purposes of ensuring compliance with the law and with RMBC policies. Any views or opinions presented are only those of the author and not those of Rotherham MBC. The copyright in all documentation is the property of Rotherham Metropolitan Borough Council and this email and any documentation must not be copied or used other than as strictly necessary for the purpose of this email, without prior written consent which may be subject to conditions.

Consultation on the Proposed Submission West London Waste Plan

From 4th August to 28th September 2026

RESPONSE FORM

The London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond-upon-Thames and the Old Oak and Park Royal Development Corporation are inviting comments on the Proposed Submission West London Waste Plan (WLWP).

The Proposed Submission WLWP sets out the proposed planning strategy for waste management in the plan area up to 2041, including identifying sites proposed to be safeguarded for waste use.

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

- Policy WLWP 1 – Safeguarding Waste Sites
- Policy WLWP 2 – Provision of Additional Waste Management Capacity
- Policy WLWP 3 – Residual Waste Management and Energy Recovery
- Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities
- Policy WLWP 5 – Recovery and Disposal of Waste to Land
- Policy WLWP 6 – Circular Economy and Resource Efficiency
- Policy WLWP 7 – Wastewater Treatment Infrastructure

This consultation is the final opportunity to comment on the Proposed Submission WLWP before it is submitted to the Secretary of State for independent 'examination in public'. We would like to hear views from our local communities, businesses and other stakeholders. At this stage in the plan making process, in accordance with the national guidance, consultation responses should focus on whether the WLWP has been developed in compliance with the relevant legal and procedural requirements, including that the plan should be in general conformity with the London Plan, and the 'soundness' of the Plan. A guidance note and answers to Frequently Asked Questions provide further detail on these terms – this document is available on the online consultation portal (via the link below) alongside other supporting information.

How to respond

All the information needed to take part in the consultation can be found on Ealing Council's online consultation portal: https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation This includes the Proposed Submission WLWP, maps and all supporting evidence. Printed copies of the Plan and key supporting documents will also be available to view at the west London Boroughs' and OPDC's main offices and selected venues in the WLWP plan area. For further information on these, please visit the online consultation portal.

You can comment on the consultation documents in the following ways:

- Online questionnaire on the consultation portal https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation
- Email a response form to WLWastePlan@ealing.gov.uk a PDF and Word version of the form can be found at

https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation . In the form, in 'Word' format you can type in your response and return it as an email attachment.

- Complete and post printed copies of the response form to the address given below. Printed copies are available at the selected locations listed on the consultation portal.
- Post written responses to:

  Planning and Infrastructure
  West London Alliance
  Ealing Council
  5th Floor, Perceval House
  14-16 Uxbridge Road
  Ealing, W5 2HL

All responses must be received by 23:59 on Monday 28th September 2026.

This form has two parts:

- Part A – Personal details and About You
- Part B – Your detailed response(s).

If you wish to comment on multiple documents or sections of the plan or supporting material, then we recommend that you download and use a separate Part B form for each comment and attach these to your postal response or email.

Part A: Personal Details		
	1. Personal Details *	**2. Agent's Details (if applicable)**
Title	[redacted]	Mr
First name	[redacted]	Philip
Last name	[redacted]	Villars
Job title (where relevant)	[redacted]	[redacted]
Organisation (where relevant)	Sharpe Refinery Service Ltd	PMV Planning
Address	c/o Agent	[redacted]
Postcode	c/o Agent	[redacted]
Telephone	c/o Agent	[redacted]
E-mail address	c/o Agent	[redacted]

*If an agent is appointed, please provide the full contact details of the agent plus the person (title, name) or organisation they are acting for.

Part A: About You…	
3. Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	
[redacted]	
[redacted]	
[redacted]	
Other - please state what your specific interest in west London might be.	PMV Planning represent the owners of the Arlington Works site in St Margarets

Data protection

We will ensure that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure.

The Privacy Statement is published on the webpage https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

All responses will be held by the London Borough of Ealing. Responses will not be treated as confidential and will be published on its website and in any subsequent statements, attributed by name and/or organisation; however, personal details like address, phone number or email address will be removed.

If you submit comments, your consultation responses and personal data will be passed to the Planning Inspectorate and a Programme Officer. The Programme Officer manages the procedural and administrative aspects of the examination. The Programme Officer will contact you using the personal information you have provided if you have indicated in the response form your wish to engage in the Examination.

Part B: Your Detailed Response			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
If you have more detailed comments to make on what the Plan should contain, please download the form, Part B– Additional Responses Continued, or print additional versions of this form, being clear about page numbers, paragraphs or infographics to which they apply, and append to your response form.			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	Various including 14, 127, 193
		Paragraph number(s)	Various including 3.12
		Policy no./name	Policy WLW1 - Safeguarding Waste Sites
		Site no./ name (see Appendices to the Plan)	Arlington Works (Facility Id 04) – Richmond upon Thames
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☐	Page number(s)	
		Paragraph number(s)	
Habitat Regulations Assessment	☐	Page number(s)	
		Paragraph number(s)	

Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☐	

5. Do you consider the West London Waste Plan is:		
5.1 Legally compliant	Yes ☐	No ☒
5.2 Sound	Yes ☐	No ☒

Further information on these terms is included within the guidance note and answers to Frequently Asked Questions available on the website at https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.

On behalf of our client, the owner of the Arlington Works site is St Margarets, we continue to object to the proposed designation of Arlington Works as a safeguarded waste site (Facility Id: R04) and disappointed that our previous representations have not been reflected in the proposed submission version of the WLWP.

It is important to emphasise that 17 local residents as well as the Twickenham Park Residents Association have submitted representations to the Regulation 18 consultation objecting to the proposed safeguarding of the Arlington Works site. These comments highlight the concerns and issues associated with a waste use in this location.

Any waste use would require planning permission (see below), and any application would clearly be opposed by local residents and likely refused by the Council.

As set out our previous representations, The historic waste use ceased over seven years ago having been cleared in 2018 following closure of the associated waste oil transfer and treatment business. The

environmental permit originally granted in 1995 by its predecessor body, the London Waste Regulation Authority, was accepted for surrender by the Environment Agency (EA) in 2020, following clearance of the site and removal of infrastructure.

The site does not have planning permission for a waste use.

A Certificate of Lawful Existing Use or Development (CLUED) was granted on 23 August 1994 for the following specific use and operational development:

"*Use for the refining of waste oil (other than petroleum or petroleum products) (to include the use of the use of fuel storage tanks in this connection)"* (LPA ref. 94/2139/S191)."

The above CLUED therefore granted immunity from enforcement action for a very specific use and operational development at a specific moment in time. As set out in para 002 of the Planning Practice Guidance (PPG), the certificate of what is lawful relates only to the state of affairs on the land at the date of the certificate application ie 23 August 1994. The storage tanks referred to in the CLUED were removed following the closure of the oil transfer and treatment business in 2018.

The use has therefore been "abandoned" in planning terms and has a "nil" use. The CLUED does not allow for operational development and planning permission would be required for this and for the use of the site for waste.

<u>Waste site definition</u>

As set out on page 54 of the proposed submission version of the WLWP, the London Plan 2021 defines existing waste sites as sites having one or both of the following:

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

The draft new London Plan 2026 proposes the below definition of a waste site:

- a site whose primary activity is a waste-management operation that is authorised by the Environment Agency; or
- a site that has a lawful planning use as a waste site

However, Para 8.8 of the proposed submission version of the WLWP proposes to expand both the adopted and emerging London Plan definition of an existing waste site. The draft WLWP seeks to define existing waste sites as land that meet at least one of the following conditions:

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

The above definition does not conform with the adopted or emerging London Plan and is contrary to para 1.8 of the proposed submission WLWP which states that this draft version is considered to be in general conformity with the requirements of the 2021 London Plan. As such, the proposed submission WLWP is unsound.

In any event, as explained in our previous representations and summarised below, the Arlington Works site does not meet the proposed waste site definition in the draft WLWP noted above.

- planning permission has never been granted for a waste use or operational development at Arlington Works and the CLUED granted in 1994 cannot be relied upon
- The historic waste infrastructure including storage tanks has been cleared. The site has not been used for a waste use for over seven years
- Planning permission would be required to recommence a waste use on the site.

Given the site's size, access and location within a residential area, there is no reasonable prospect of an application being permitted for a waste use on the site. This is further demonstrated by objections from 17 local residents and the Twickenham Park Residents Association to the Regulation 18 consultation of the WLWP expressing the concerns and issues with a waste use at Arlington Works. Furthermore, the site has been marketed since May 2025 and no interest has been received from waste or re-cycling operators.

Removal of Arlington Works as a safeguarded waste site would make better use of this underutilised brownfield site, in accordance with Policy L2 in the National Planning Policy Framework.

Conclusion

As it stands, the draft WLWP is unsound. For reasons set out above, the draft WLWP should release Arlington Works as a Safeguarded Site.

Please continue on a separate sheet / expand box if necessary.

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Arlington Works site in St Margarets (Facility Id R04) should be released as a Safeguarded Site in the draft WLWP for reasons explained above.

Please continue on a separate sheet / expand box if necessary.

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.*

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	
☐ **No**, I do not wish to participate in hearing session(s)	☒ **Yes**, I wish to participate in hearing session(s)
Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.	
9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: ***Please note*** *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*	
We represent the owners of the Arlington Works site in St Margarets (Facility Id R04) and wish to explain why this site should be released as a Safeguarded Site in the draft WLWP.	
10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the West London Waste Plan.	
If you do not wish to be notified of future updates on the West London Waste Plan, then please tick this box, complete Part A: Personal Details of this form and return it to us. Note your name, business (if entered) and response will still be published in the consultation report.	☐

Signature:	PMV Planning	Date:	28 September 2026
For electronic responses a typed signature is acceptable.			

Consultation on the Proposed Submission West London Waste Plan

From 4th August to 28th September 2026

RESPONSE FORM

The London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond-upon-Thames and the Old Oak and Park Royal Development Corporation are inviting comments on the Proposed Submission West London Waste Plan (WLWP).

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- Policy WLWP 3 – Residual Waste Management and Energy Recovery
- Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities
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- Policy WLWP 6 – Circular Economy and Resource Efficiency
- Policy WLWP 7 – Wastewater Treatment Infrastructure

This consultation is the final opportunity to comment on the Proposed Submission WLWP before it is submitted to the Secretary of State for independent 'examination in public'. We would like to hear views from our local communities, businesses and other stakeholders. At this stage in the plan making process, in accordance with the national guidance, consultation responses should focus on whether the WLWP has been developed in compliance with the relevant legal and procedural requirements, including that the plan should be in general conformity with the London Plan, and the 'soundness' of the Plan. A guidance note and answers to Frequently Asked Questions provide further detail on these terms – this document is available on the online consultation portal (via the link below) alongside other supporting information.

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  Ealing Council
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  Ealing, W5 2HL

All responses must be received by 23:59 on Monday 28th September 2026.

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- Part B – Your detailed response(s).

If you wish to comment on multiple documents or sections of the plan or supporting material, then we recommend that you download and use a separate Part B form for each comment and attach these to your postal response or email.

Part A: Personal Details		
	1. Personal Details *	**2. Agent's Details (if applicable)**
Title	Miss	
First name	Laura	
Last name	Waters	
Job title (where relevant)	[redacted]	
Organisation (where relevant)	Spelthorne Borough Council	
Address	[redacted]	
Postcode	[redacted]	
Telephone	[redacted]	
E-mail address	[redacted]	

*If an agent is appointed, please provide the full contact details of the agent plus the person (title, name) or organisation they are acting for.

Part A: About You…	
3. Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	
[redacted]	
[redacted]	
[redacted]	
Other - please state what your specific interest in west London might be.	Neighbouring Local Authority

Data protection

We will ensure that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure.

The Privacy Statement is published on the webpage https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

All responses will be held by the London Borough of Ealing. Responses will not be treated as confidential and will be published on its website and in any subsequent statements, attributed by name and/or organisation; however, personal details like address, phone number or email address will be removed.

If you submit comments, your consultation responses and personal data will be passed to the Planning Inspectorate and a Programme Officer. The Programme Officer manages the procedural and administrative aspects of the examination. The Programme Officer will contact you using the personal information you have provided if you have indicated in the response form your wish to engage in the Examination.

Part B: Your Detailed Response			
4. To which parts of the Proposed Submission West London Waste Plan does your response relate?			
If you have more detailed comments to make on what the Plan should contain, please download the form, Part B– Additional Responses Continued, or print additional versions of this form, being clear about page numbers, paragraphs or infographics to which they apply, and append to your response form.			
Documents		**Sections**	
Proposed Submission West London Waste Plan	☒	Page number(s)	Various
		Paragraph number(s)	Various
		Policy no./name	WLWP1, WLWP3, WLWP4, Monitoring Framework
		Site no./ name (see Appendices to the Plan)	
		Maps	
		Tables	
Integrated Impact Assessment Report (including the Non-Technical Summary)	☒	Page number(s)	Various
		Paragraph number(s)	Various
Habitat Regulations Assessment	☒	Page number(s)	Various
		Paragraph number(s)	Various
Other (for example an alternative approach, or in relation to another supporting /evidence base document)	☒	Strategic Waste Flows Study Capacity Assessment Habitats Regulations Assessment Climate Change Topic Paper	

5. Do you consider the West London Waste Plan is:		
5.1 Legally compliant	Yes ☒	No ☐
5.2 Sound	Yes ☒	No ☐

Further information on these terms is included within the guidance note and answers to Frequently Asked Questions available on the website at https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation

6. Please give details of why you consider the Waste Plan is not legally compliant or is unsound. If you wish to support the legal compliance and/or soundness of the Waste Plan, please use this box to set out your comments.

Spelthorne Borough Council supports the overall strategy and objectives of the Proposed Submission West London Waste Plan and considers the supporting evidence base to be generally robust.

The Council welcomes the continued commitment to safeguarding waste management capacity, supporting circular economy principles, addressing climate change and biodiversity issues and recognising the importance of strategic waste movements and cross-boundary cooperation. The evidence base demonstrates that the Plan has been informed by a substantial programme of technical work covering waste capacity, climate change, flood risk, strategic waste movements, environmental impacts and future waste arisings.

However, Spelthorne considers a number of modifications would improve the effectiveness of implementation of the Plan over the plan period:

Heathrow Airport expansion remains a potentially significant factor affecting waste management capacity, strategic waste movements and waste infrastructure within the Heathrow corridor. Whilst the supporting evidence acknowledges these risks, a more explicit monitoring and review mechanism linked to Heathrow expansion would strengthen the Plan.

The Plan relies upon a network of strategic waste facilities outside the Plan area, including facilities within Slough, Buckinghamshire, Surrey and other neighbouring authorities. The continued availability of these facilities plays an important role in delivery of the Plan strategy and should be more explicitly reflected within monitoring arrangements.

The Council supports the emphasis placed on environmental protection but considers there is scope for greater recognition of cumulative environmental effects, strategic green infrastructure networks,

ecological connectivity and climate adaptation. Particular regard should be given to the River Colne corridor, the Colne Valley area, and designated ecological sites identified through the Habitats Regulations Assessment.

The Monitoring Framework would benefit from additional indicators relating to strategic waste movements, external strategic facilities, Heathrow-related capacity changes and biodiversity outcomes in order to strengthen the long-term effectiveness of the Plan.

Please continue on a separate sheet / expand box if necessary.

7. Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and/or sound, in respect of any legal compliance or soundness matter you have identified at 6 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Spelthorne Borough Council suggests the following modifications:

- Include a specific monitoring and review trigger relating to Heathrow Airport expansion and any resulting loss, relocation or reduction in waste management capacity within the Heathrow corridor.
- Strengthen the Monitoring Framework by including indicators relating to:
    - Heathrow-related capacity impacts;
    - strategic waste imports and exports;
    - reliance on strategic facilities outside west London;
    - cumulative environmental impacts; and
    - biodiversity and green infrastructure outcomes.
- Strengthen supporting text to recognise the role of strategic facilities outside west London, including Lakeside Energy from Waste Facility and other facilities identified within the Strategic Waste Flows evidence.
- Include stronger references to climate adaptation, flood resilience, sustainable drainage, ecological connectivity and strategic green and blue infrastructure in implementation of Policies WLWP3 and WLWP4.
- Strengthen references to ongoing cross-boundary cooperation regarding strategic waste movements, infrastructure resilience and environmental management.

Please continue on a separate sheet / expand box if necessary.
Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.*
8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☒ **No**, I do not wish to participate in hearing session(s)	☐ **Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.
9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: ***Please note*** *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*
10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the West London Waste Plan.

If you do not wish to be notified of future updates on the West London Waste Plan, then please tick this box, complete Part A: Personal Details of this form and return it to us. Note your name, business (if entered) and response will still be published in the consultation report.	☐

Signature:	Laura Waters	Date:	24/09/2026

For electronic responses a typed signature is acceptable.

Lauren Laviniere

From: Vijay Gandhi [redacted]
Sent: 10 August 2026 17:34
To: wlwasteplan
Subject: Proposed Submission West London Waste Plan – Stockley Park Landowner Interests

Follow Up Flag: Follow up
Flag Status: Flagged

WARNING : This Message has originated from outside your organization, If you do not trust this email please either delete or follow the guidance on OneSpace.

Dear West London Waste Plan Team,

Thank you for notifying us of the Regulation 19 consultation on the Proposed Submission West London Waste Plan.

We are a significant landowner at Stockley Park, UB11 and own nine buildings within the park. We are currently reviewing the Proposed Submission Plan and its supporting evidence to understand whether any of our properties or wider land interests are affected by a proposed waste-site safeguarding designation or by policies that could influence their future redevelopment and intensification.

As part of the emerging Hillingdon Local Plan process, we intend to promote appropriate parts of our Stockley Park portfolio for modern industrial and employment uses. We therefore have a particular interest in ensuring that the West London Waste Plan:

- Does not impose an unintended waste-site safeguarding designation on any of our properties.
- Does not unnecessarily restrict the delivery of modern industrial and employment accommodation at Stockley Park.
- Properly distinguishes general industrial and employment uses from waste-management uses.
- Remains sufficiently flexible to accommodate the comprehensive redevelopment and intensification of suitable employment land.
- Is coordinated with Hillingdon's emerging Local Plan and the treatment of Stockley Park in the Draft London Plan 2026.

Please confirm whether any of our ten buildings or associated land at Stockley Park are included within, adjacent to or otherwise affected by a safeguarded waste site identified in the Proposed Submission Plan. We would be pleased to provide a schedule of property addresses and a site plan to assist with this confirmation.

Please also register us as a landowner and stakeholder for further notifications concerning the West London Waste Plan, including:

- Submission of the Plan for independent examination.
- Publication of the Planning Inspector's report.
- Adoption of the Plan.

Subject to your response and completion of our review, we reserve the right to submit a formal Regulation 19 representation before the consultation deadline of 28 September 2026.

Separately, we would be grateful if our interest as a major Stockley Park landowner could be brought to the attention of Hillingdon Council's Planning Policy team for engagement concerning the emerging Hillingdon Local Plan and any future masterplanning of Stockley Park.

Please confirm receipt and advise if you require further property information.

Kind regards,

Vijay Gandhi

West London Waste Plan
Issued by Email Only
WLWastePlan@ealing.gov.uk

28th September 2026

Reg 19 – Proposed Submission - West London Waste Plan up to 2041

To whom it may concern,

Thank you for the opportunity to respond to the above consultation. SUEZ Recycling and Recovery UK Ltd have a longstanding interest in several sites which we operate within the Plan Area. We have the following comments on the Proposed Submission version of the West London Waste Plan ("the WLWP").

Safeguarding existing sites - sound

SUEZ wholly supports the identification and continued safeguarding of the existing waste management operations at HI28 Hayes Transfer Station, HI29 Victoria Road WTS, HO14 Transport Avenue WTS, HI06 Land off Holloway Lane and HI09 Holloway Lane Materials Recycling Facility listed in Appendix 2: List of Safeguarded Waste Sites and supported by Policy WLWP 1. We also support the recognition of the contribution of waste sites where a Certificate of Lawful Existing Use or Development (CLEUD) has been granted.

SUEZ further supports the safeguarding of railhead infrastructure associated with safeguarded waste facilities under Policy WLWP 1 part H. Given the strategic importance of sustainable waste transport, SUEZ considers that incompatible neighbouring or planned development should not prejudice the continued operation or reasonable future utilisation of waste-related rail infrastructure.

SUEZ also supports the application of the Agent of Change principle through Policy WLWP 1 part I. This is an increasingly important consideration given the development pressures experienced by established waste management sites. SUEZ particularly welcomes the recognition that the development of housing and other development with sensitive users should not constrain a safeguarded site's "*current and future operation or capacity*".

SUEZ supports that the WLWP recognises not only the current operation of existing sites but their reasonable future development and modernisation to adapt to changing waste streams, technologies and regulatory requirements over the Plan period, as recognised in Strategic Objective 1 and Policies WLWP 1 and WLWP 2. It is imperative that waste operations are able to adapt to future waste management needs arising in the WLWP area.

Capacity – opportunity to strength soundness of the Plan

SUEZ notes that the WLWP identifies there is sufficient waste management capacity to meet identified needs over the Plan period (paragraph 8.21). However, this overall assessment should not be taken to mean that sufficient capacity necessarily exists for individual waste streams or particular forms of treatment. In particular, the aggregation of waste management capacity does not demonstrate whether sufficient capacity exists for food waste treatment capacity in the WLWP area resulting from the now-mandatory separate food waste collections for households and businesses introduced through Simpler Recycling. These requirements are resulting in increasing volumes of food waste in the WLWP area. Currently, the West London Waste Authority website identifies that food waste is treated in an anaerobic digestion (AD) facility outside of the WLWP area, in Mitcham, South London.[1]

It is SUEZ's position that the assessment of overall capacity within the WLWP area must not constrain the provision of specialist capacity to manage particular waste streams. For the avoidance of doubt and to ensure the effectiveness of the Plan, SUEZ suggests that the supporting text at paragraph 8.21 should include a statement to support proposals for additional capacity where there is an identified need for the management of a particular waste stream or for a particular waste management technology with reference to WLWP 2.

SUEZ strongly supports Policy WLWP 2 which does address the opportunity to develop facilities which address an specific need. This is particularly important in supporting the development of future AD capacity within the WLWP area itself, as it allows for additional waste management capacity where this would move waste up the waste hierarchy and/or address an identified specific need (paragraph 8.25). AD represents precisely the type of infrastructure that can respond to such a need; it would provide a dedicated treatment route for separately collected food waste while recovering renewable energy.

[1] West London Waste (2026) **Food** Available at: *https://westlondonwaste.gov.uk/materials/food* (accessed 28th September 2026).

It is further noted that the creation of renewable energy from food waste through AD is distinct from the energy-from-waste capacity dealt with by Policy WLWP 3. Policy WLWP 3 being for residual waste only. This would appear to exclude energy produced from food waste through an AD process because anaerobic digestion facilities fall within the description of 'recycling' capacity in the meaning of waste management in the London Plan (set out at paragraph 9.8.4 of the London Plan, 2021 which is replicated at paragraph at 5.37 of the WLWP Plan).

Enclosure of waste management facilities - support

Paragraph 8.44 identifies the preference for the enclosure of waste management operations within buildings. SUEZ welcomes the recognition that there may be circumstances where enclosure is not a practicable option and supports the identification of other mitigation measures which could be appropriate. We support this flexibility in the WLWP.

Environmental Standards – opportunity to strength soundness of the Plan

Policy WLWP 4 notes that all proposals 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*." SUEZ supports the principle that waste management facilities should achieve high environmental standards. However, we consider that the term "*highest practicable environmental standards*" lacks sufficient clarity as currently drafted.

Whilst it is assumed that the environmental standards against which this requirement is to be assessed are environmental standards set out in relevant guidance and legislation which are proportionate to the nature, scale and environmental effects of the development, the current policy and supporting text is unclear. This could create uncertainty for applicants and decision-makers and risks inconsistent application of the policy over the Plan period.

SUEZ suggests that further clarification is included to ensure that Policy WLWP 4 provides a clear and deliverable basis for decision-making, having regard to the test of soundness set out within Policy PM15 of the NPPF. This is particularly important where environmental matters are controlled through separate regulatory regimes, having regard to NPPF Policy DM7, which states that planning decisions should not seek to duplicate or extend controls imposed by separate regulatory regimes. This is acknowledged in a footnote to Policy WLWP 4; albeit this reference should be updated to reference the NPPF 2026.

SUEZ trusts that the above representations will be of assistance and we would welcome the opportunity to engage further with the waste planning authorities as the WLWP progresses.

Yours faithfully,

[redacted]

Emma Smyth

[redacted]

[redacted]

Your Ref:

SURREY
COUNTY COUNCIL

[redacted]

Planning and Infrastructure
West London Alliance
Ealing Council
5th Floor, Perceval House
14-16 Uxbridge Road
Ealing, W5 2HL

By email only: WLWastePlan@ealing.gov.uk

3 February 2026

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990
REGULATION 19 PROPOSED SUBMISSION WEST LONDON WASTE PLAN

Public Consultation 4 August to 28 September

Thank you for consulting Surrey County Council as Minerals and Waste Planning Authority (MWPA) regarding the above plan.

The MWPA notes that we were previously consulted on the Regulation 18 draft plan, and responded on 2 February 2026, where we provided no comments.

We also responded to a Duty to Cooperate letter from the West London Alliance relating to the strategic movement of waste between our authorities on 11 November 2025. In our response, we noted that strategic quantities of waste from West London were managed at two facilities in Surrey: Patteson Court Landfill in Redhill, and Homers Farm Inert Landfill in Staines-upon-Thames. We noted that these sites were due to close on 31 December 2030 and 30 September 2024 respectively. Notwithstanding, we did not consider that a Statement of Common Ground between our authorities was necessary.

Accordingly, the MWPA raise **NO OBJECTIONS** to the adoption of the West London Waste Plan but would remind the authorities' of the end dates for the above facilities as they relate to the management of inert and hazardous waste from West London.

I trust the above is self-explanatory and helpful. However, should you have any questions or require further information please do not hesitate to contact me.

Yours sincerely,

[redacted]

Dustin Lees MRTPI

[redacted]

wlwasteplan

From: Maria Kenworthy [redacted]
Sent: 04 September 2026 12:42
To: wlwasteplan
Cc: Spatial Planning
Subject: West London Waste Plan Reg 19 Consultation - TfL Response

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Consultation on Updated West London Waste Plan (Reg 19) – TfL Response

Please note that these comments represent the views of TfL officers and are made on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. These comments are provided alongside the views of the Greater London Authority (GLA).

Thank you for giving Transport for London (TfL) the opportunity to comment on the updated West London Waste Plan (WLWP) Regulation 19 consultation. TfL previously provided comments on the WLWP Regulation 18 consultation and has reviewed the updated Plan.

TfL fully support achieving logistical efficiency in waste management facilities in West London through a sound, sustainable waste plan as, in turn, it will result in more efficient waste collection, easing pressures on TfL's and local councils' highway network as well as more broadly complying with London Plan policies.

Having considered the changes made, TfL wishes to reiterate the following point raised at Regulation 18, which remain applicable and have not been addressed through the current amendments:

- The draft WLWP currently does not make reference to the use of Direct Vision Lorries for waste vehicles or the use freight operators who can demonstrate their commitment to TfL's Freight Operator Recognition Scheme (FORS) or similar. Furthermore, it does not make reference to TfL's Vision Zero Action Plan. It is encouraged that this is referenced by the WLWP within the supporting text.

In addition, TfL wishes to provide the following infrastructure protection comment in relation to the proposed release and redevelopment of safeguarded waste sites:

- London Underground Infrastructure Protection needs to be consulted when the safeguarded waste site is developed in the vicinity of LU assets. This is to ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with the London Plan 2021 Policy T3 and Sustainable Transport Walking and Cycling London Plan Guidance 2022.
- Where a safeguarded waste site is developed in the vicinity of railway infrastructure, any proposal involving redevelopment, replacement, extension, or material intensification must demonstrate that the development will not adversely affect the safety, stability, integrity, operation, or maintenance of the railway. Each site development proposal should be supported, where appropriate, by technical assessments addressing matters including but not limited to ground movement and settlement; structural stability; foundations and piling; fire and smoke impacts; drainage; construction activities and methodologies; and emergency access arrangements. An Asset Protection Agreement and an Interface Management Plan will be required where appropriate and should be developed jointly between TfL and the developer on a site-specific basis.

Kind regards,

Maria

[redacted]

[redacted] **For any future enquiries after this date, please contact spatialplanning@tfl.gov.uk**

For more information regarding TfL Spatial Planning, including TfL's *Transport assessment best practice guidance* and pre-application advice please visit: https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services



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wlwasteplan

From: Planning Policy [redacted]
Sent: 21 September 2026 10:51
To: wlwasteplan
Subject: RE: West London Waste Plan Consultation

WARNING : This Message has originated from outside your organization, If you do not trust this email please either delete or follow the guidance on OneSpace.

Dear West London Waste Planning Team,

Regulation 19 Consultation - Proposed Submission West London Waste Plan

Thank you for offering Waverley the opportunity to consider and comment on the WLWP Reg 19 Consultation. At this stage we have no comments to make in relation to this Proposed Submission version.

Yours sincerely,

George Dagg
[redacted]
Waverley Borough Council
[redacted]

From: wlwasteplan <wlwasteplan@ealing.gov.uk>
Sent: 03 August 2026 18:06
To: Consultation Planning [redacted]
Subject: West London Waste Plan Consultation

[This email originates from an external source **]**

Dear Stakeholder,

We are writing to inform you that the West London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames, together with the Old Oak and Park Royal Development Corporation (OPDC), are publishing the Proposed Submission version of the West London Waste Plan (WLWP) for comment.

This important document sets out the proposed planning strategy for waste management for these authorities up to 2041 and includes policies that are proposed to be used when assessing planning applications related to waste management development. It also identifies sites proposed to be safeguarded for waste use.

The WLWP aims to provide an up to date, sound and effective planning strategy for waste management in accordance with national policy, the London Plan, and local priorities. We

consulted previously on a draft updated West London Waste Plan and the comments received have helped shape the Proposed Submission version. If adopted, the updated West London Waste Plan would replace the current 2015 WLWP.

Please note you may have received this notification more than once from different authorities – you only need to respond once as all responses will be collated.

This is the final opportunity to comment before the documents are submitted to the Secretary of State for Examination, the west London boroughs and OPDC invite representations on whether the Proposed Submission WLWP is 'sound' and 'legally compliant', including whether it is in general conformity with the London Plan. Please visit **haveyoursay.ealing.gov.uk/projects/wlwp-consultation** to find out more about the Plan and answers to some frequently asked questions.

How can I view and comment on the documents?

Ealing Council is hosting the consultation on their online portal, on behalf of the other planning authorities involved. You can view the Proposed Submission WLWP and its supporting documents, including the Integrated Impact Assessment and Habitats Regulations Assessment, via Ealing Council's online consultation portal: **haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation.** The Statement of Representations Procedure and Statement of Fact' can be accessed with the above link. Reference copies of the Proposed Submission WLWP are also publicly available for inspection at various libraries and offices listed on the online consultation portal - more details are in the 'Statement of Representations Procedure and Statement of Fact'.

The publication period closes on **Monday 28th September** (23:59). You are invited to provide feedback on the Proposed Submission WLWP and the supporting documents. You can submit your comments to us in writing by any of the following methods:

- Complete an online questionnaire on Ealing Council's online consultation portal using the above website.
- Email your completed response form to wlwasteplan@ealing.gov.uk. A PDF and a Word version of the form can be found at haveyoursay.ealing.gov.uk/projects/wlwp-consultation. In the Word version, you can type in your response and return it as an email attachment.
- Complete and post printed copies of the response form to the address given below. Printed copies are available at the selected locations listed on the consultation portal.
    - Post written responses to:
      Planning and Infrastructure
      West London Alliance

Ealing Council
5th Floor, Perceval House
14-16 Uxbridge Road
Ealing, W5 2HL

- Email responses to: wlwasteplan@ealing.gov.uk

If you have any questions about the consultation, or need the documents in an alternative format, please contact the WLWP Project Manager, wlwasteplan@ealing.gov.uk

Following the completion of the publication process, all responses received will be submitted to the Government with the WLWP and other supporting documents, for examination by an independent planning inspector. Please note that your response will not be treated as confidential and any anonymous responses will not be accepted. Responses to this consultation will be published, with any personal contact details redacted in accordance with general data protection principles.

The authorities are committed to ensuring that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure. If you submit comments, your consultation responses and personal data will be passed to the Planning Inspectorate and a Programme Officer. The Privacy Statement is published on the webpage https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation. We hope that you or your organisation will continue to take an interest in the progression of the West London Waste Plan. If, however, you would prefer not to receive notifications, you can let us know.

Yours faithfully,

The West London Waste Planning Team
On behalf of the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond upon Thames and the Old Oak and Park Royal Development Corporation.

London Borough of

****

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Please visit our website at https://www.waverley.gov.uk

City of Westminster

[redacted]

By email to: WLWastePlan@ealing.gov.uk.
Cc: McNamaraA@ealing.gov.uk

Date: 28th September 2026

Dear Sir/Madam

Regulation 19 Submission Version West London Waste Plan

I am writing on behalf of Westminster City Council, and in response to the above consultation.

Thank you for the opportunity to comment on the Regulation 19 West London Waste Plan submission (hereafter 'the Plan').

The council considers that collectively, the Plans policies set out a positive approach to meeting development needs in the plan area in a way that is appropriate, effective, consistent with national policy and in general conformity with the London Plan. Westminster City Council supports the overall vision, strategic objectives and policies of the Plan. In particular, the council welcomes the Plan's strong emphasis on circular economy principles, safeguarding existing waste sites, planning for the potential intensification of such sites to meet evidenced need and supporting positive environmental outcomes. The council also agrees with the plan's aim to maximise the use of sustainable transport methods to reduce emissions from transport waste as much as possible.

The ambitions of the WLWP greatly align with Westminster's own strategies for sustainable waste management which are outlined in Westminster's Municipal Waste Management Strategy 2016-2031, Environment SPD and the City Plan (2026). The council is committed to promoting the Circular Economy, maximising the management of waste at the top of the waste hierarchy, transitioning to low-carbon freight and safeguarding waste management infrastructure. This alignment places Westminster in a strong position to become a committed and constructive partner within the West London Waste Plan partnership.

Providing for Unmet Need outside the Plan Area

In August 2026, Westminster City council provided the WLWA with information relating to the nature of unmet waste management need in Westminster. The information provided demonstrated that unlike most other local authorities, Westminster has no strategic waste management facilities of its own and therefore does not have sufficient qualifying capacity to meet the London Plan HIC (LACW and C&I) apportionment targets, forecast C, D&E or Hazardous waste arisings for over the City Plan period. See Appendix 1.

The Plan identifies that the area has a surplus capacity of 357,711 tonnes per annum (after site releases have been accounted for). In line with London Plan policy and the National Planning Policy for Waste (NPPW), the Plan appropriately recognises that this surplus capacity can assist other London boroughs in meeting their London Plan waste apportionments and therefore contributes to London Plan's goal of net self-sufficiency. Paragraphs 7.8 and 7.9 reference the joint working the WLWA have already conducted and will continue to do

and sets out the formal mechanism through which sharing surplus waste capacity with other London boroughs may take place. This further demonstrates the Plan is positively prepared, consistent with national policy and in general conformity with the London Plan.

We note the wording of WLWP1 G has removed reference to the need to consider the waste needs of London as a whole over the Plan period (considering current and upcoming London Plan apportionment targets and net self-sufficiency targets), prior to the release of sites for other land uses. We do not object to this change in policy wording and acknowledge the plan still references this within paragraphs 7.8/7.9 and Strategic Objective 1. However, the council recommends retaining a reference within the policy to the need to ensure that surplus capacity is used to meet unmet waste needs of adjacent authorities. This would more greatly align with NPPW's support for cross-boundary cooperation, London Plan Policy SI 8 para 9.8.6 and 9.8.7 and emerging London Plan policy GLE12 D 1.

As raised in our regulation 18 response, all previous iterations of Westminster's City Plan have been unable to identify suitable sites for waste management within our own borough boundary and the council's current arrangement for the management of LACW and C&I waste streams will soon cease following the end of our agreement with the London Borough of Bexley. Westminster will therefore need to seek assistance from neighbouring local authorities in meeting its HIC apportionment set by the London Plan. As previously stated, the council would welcome the opportunity to join the partnership and work collaboratively to support the delivery of the West London Waste Plan. Westminster looks forward to continuing discussions with the WLWA regarding future cross-boundary waste planning arrangements.

Yours faithfully,

[redacted]

Richard Cressey

Appendices

Appendix 1

Predicted quantum of unmet need by waste type (HIC, C&D and hazardous) and capacity type

HIC

Table 9.1 of the London Plan 2021 sets out anticipated household and business waste arisings in each London borough. Following the review of available waste sites in Westminster, Table 2 below compares Westminster's London Plan apportionment to the Assessed Qualifying Capacity in Westminster.

Table 2: London Plan HIC waste (LACW and C&I) apportionment for Westminster compared to Assessed Qualifying Capacity in Westminster (in kilo tonnes).

	2041
LP apportionment forecast (tpa)	200
WCC capacity (tpa)	0
Difference (tpa)	-200

The table above demonstrates there is insufficient qualifying management capacity to manage the London Plan 2021 apportionments through to 2041. The capacity deficit in 2041 is assessed to be c200,000 tpa.

C&D

In 2020, the council commissioned Vitaka Consulting LTD to prepare the Waste Data Study to support Westminster's City Plan 2019-2040 (see Appendix 1). The study calculated forecast C, D&E waste arisings for over the City Plan period. Following the review of available waste sites in Westminster, Table 3 below compares the C, D&E arisings to the Assessed Qualifying Capacity in Westminster.

Table 3: Forecast C,D&E waste for Westminster compared to Assessed Qualifying Capacity in Westminster (in kilo tonnes).

Waste Stream	2041
Forecast quantum waste	290
WCC Qualifying capacity	0
Difference	290

The table above demonstrates there is insufficient qualifying management capacity to manage forecast C&E waste through to 2041. The capacity deficit in 2041 is assessed to be c290,000 tpa.

Hazardous

All the waste streams include some hazardous waste. All hazardous waste arising in Westminster is exported to be treated at specialist facilities which have a wide catchment area. The Environment Agency's Waste Data Interrogator states that in 2024, 5135 tonnes of hazardous waste were generated in Westminster, and this waste was sent to Waste Planning Authorities outside of Westminster (see Appendix 4).

Assessment of Strategic Industrial Locations, Locally Significant Industrial Sites, non-designated industrial sites, safeguarded wharves and existing waste and secondary material sites present within the WPA Plan area that may be suitable to accommodate additional capacity as per London Plan Policy SI 8 B 4)

In 2019, the council produced a Waste Evidence paper (updated Nov 2019) to support the City Plan review (see Appendix 6). The evidence paper assessed all potential waste sites and areas in the borough. The potential typologies of land set out in national and London policy were considered in turn. The situation with Westminster has not changed since this assessment. Below is an excerpt from the Evidence paper (page 19-20)

> *Strategic Industrial Locations*
> There are no Strategic Industrial Locations in Westminster.
>
> *Locally Significant Employment Areas*
> There are no Locally Significant Employment Areas in Westminster.
>
> *Existing waste sites*
> There are no licensed waste management facilities in Westminster. However, Westminster does contain a network of waste related sites where waste is consolidated for onward transport, which might have some potential for intensification or co-location of other waste. Although many of these sites are very small, this will be assessed in the following stage. For the purpose of this analysis, 158 sites have been considered.
>
> *Other industrial land*
> There are no other (designated) industrial areas in Westminster. The individual site with industrial uses that do exist in the city are of mixed use and are not purpose built industrial locations. Therefore, no potential industrial sites have been identified.
>
> *Wharves*
> There are no wharves in Westminster.
>
> *Previously developed land*
> The National Planning Policy Framework defines previously developed land as land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure. For the purpose of this assessment both vacant and derelict sites, and land and buildings in use that may be available for redevelopment will be considered. These include key development sites allocations in the City Plan, sites with unimplemented planning permission, sites with "pending planning decision", sites in the Brownfield Register and other sites with potential for (re-)development. For the purpose of this analysis, 1,405 previously developed land sites have been considered.
>
> A total number of 1,563 sites will be considered in the following stage.

The paper then continues to demonstrate a waste site sieve analysis was conducted using GIS data to analyse the suitability of sites for waste management facilities. The sieve analysis identified 52 potential sites

More detailed analysis of the 52 sites further investigated their suitability for waste management facilities. This meant assessing technical feasibility, availability and any planning constraints. The analysis showed that there are currently no sites that could potentially be used to accommodate waste management facilities in Westminster. The initially 52 identified sites do not meet the eligibility criteria for being waste management facilities.

Following this analysis, it was concluded that, unlike other authorities, Westminster has very limited available land that can meet the eligibility criteria for being waste management facility. Therefore, there the council does not have proposals to promote the release of land suitable to accommodate additional waste capacity for non-industrial uses.

Further evidence

The London Industrial Land Supply Study (March 2023) Appendix A (see Appendix 6) provides details on the quantity of industrial land use for different geographies for the years 2001, 2006, 2010, 2015 and 2020. The dataset shows that in Westminster, the use of industrial land for waste management and recycling has stayed the same from 2001 to 2020 (see page 37). This demonstrates that unlike many other boroughs, Westminster does not have suitable SILs or LSISs for waste management and recycling.

Appendix 2

WCC Regulation 18 Response – 4th February 2026

Westminster City Council
westminster.gov.uk

City of Westminster

[redacted]

By email to: WLWastePlan@ealing.gov.uk.
Cc: McNamaraA@ealing.gov.uk

Date: 4th February 2026

Dear Sir/Madam

Regulation 18 Draft Updated West London Waste Plan

I am writing on behalf of Westminster City Council, and in response to the above consultation.

Thank you for the opportunity to comment on the draft West London Waste Plan.

The council commend the West London Waste Partnership on a well drafted plan and support the strategic objectives of the partnership – which align with the council's strategy for waste management. In particular, the council agrees with the overall direction and scope of the Plan's Vision. The focus on circular economy principles is welcomed, as this is a key area of focus for Westminster in its strategy to reduce waste in the city. The council also agrees with the overall direction and scope of the Plan's Strategic objectives. The Plan's support for the expansion of sustainable transport options for waste movement aligns well with the council's own strategy for transitioning to low-carbon freight.

The council also supports Policy WLWP 2, which sets out that the Plan can and should respond to future waste needs, where additional capacity can be developed. It is noted that the London Plan makes clear that where boroughs or waste partnerships identify surplus waste management capacity, this capacity should be used to assist other boroughs in meeting their apportionment, before a site is considered for release.

To support the partnership in being able to identify whether there are any potential sites for release, the council want to highlight their current position in relation to waste apportionment in the city. In line with policy WLWP1 G, taking into consideration Westminster's current lack of waste capacity will help West London boroughs understand what their surplus capacity is likely to be, and therefore identify sites that could be considered for other land uses.

In 2024/25, approximately 133,000 tonnes of residual municipal waste left Westminster, for thermal treatment at SELCHP in Lewisham, with a further 5,900 tonnes of mainly bulky waste processed into Refuse Derived Fuel and sent to other UK and EU thermal treatment facilities. In addition, approximately 42,568 tonnes of dry recycling and organic waste left Westminster for treatment at facilities in Essex, Southwark, Southampton, Kent and Hertfordshire. This however does not account for Westminster's apportioned waste by 2041 in the London Plan, which will be 200,000tpa.

All previous iterations of the council's local plan have been unable to identify suitable sites for waste management within its own borough boundary, and it is highly unlikely that any future sites will be identified. Policy 41 Waste management in the City Plan 2019 – 2040 (January 2026), sets out the management of waste streams in Westminster. The council's current arrangement for the management of LACW and C&I waste streams will soon cease following the end of our agreement with the London Borough of Bexley, however the strategies for CD&E and other waste streams will remain. Westminster will therefore need to seek assistance from neighbouring local authorities in meeting its HIC apportionment set by the London Plan. The council would welcome the opportunity to join the partnership and work collaboratively to positively plan for this unmet need, with a view to support the partnership in identifying surplus sites that could potentially be released

As highlighted above, Westminster's ambitions and strategic goals in relation to waste reduction, and minimising carbon emissions arising from freight are well aligned with the aspirations of the West London Waste Partnership, and the council would welcome joining the partnership and working together to deliver this strategy.

I look forward to engaging in further dialogue on this matter.

Yours faithfully,

[redacted]

Richard Cressey

[redacted]

[redacted]

From: fred freddy [redacted]
Sent: 04 August 2026 19:14
To: Localplan
Subject: Re: Notification of Proposed Submission West London Waste Plan Consultation Launch (3)

Follow Up Flag: Follow up
Flag Status: Flagged

WARNING : This Message has originated from outside your organization, If you do not trust this email please either delete or follow the guidance on OneSpace.

Dear West London Waste Plan Team,

Thank you for consulting stakeholders on the Proposed Submission

West London Waste Plan (WLWP).

As a local resident engaged with Ealing Council on environmental initiatives,

I welcome the updated strategy for managing waste across

the West London boroughs up to 2041.

I would like to submit the following points for consideration to help ensure the plan is environmentally sound and effective:

- **Prioritising Food and Organic Waste:** The plan should strictly focus on reducing organic waste at the source. Implementing more comprehensive, accessible, and frequent food waste collection systems across all six boroughs is essential to divert biodegradable material from incinerators and landfills.
- **Promoting Plant-Based and Sustainable Solutions:** Encouraging home composting and supporting community-based organic recycling schemes will significantly reduce emissions and lower the carbon footprint of waste management in West London.
- **Refusing Incineration Over Recycling:** Expanding recycling infrastructure and community education should take precedence over energy-from-waste (incineration) processes, which often contribute to local air pollution.

I believe incorporating these priorities will make the West London Waste Plan sounder, more sustainable, and aligned with climate action goals.

Yours sincerely,

Mr Reza Maleki

[redacted]

On Tue, 4 Aug 2026, 15:48 Localplan, <Localplan@ealing.gov.uk> wrote:

Dear Consultee,

Publication of the Regulation 19 Proposed Submission West London Waste Plan – 4 August 2026 to 28 September 2026

We are writing to inform you that the west London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames, together with the Old Oak and Park Royal Development Corporation (OPDC), are publishing the proposed Submission version of the West London Waste Plan (WLWP) for comment.

This important document sets out the proposed planning strategy for waste management for these authorities up to 2041 and includes policies proposed to be used when assessing planning applications that relate to waste management development. It also identifies sites proposed to be safeguarded for waste use.

The WLWP aims to provide an up to date, sound and effective planning strategy for waste management in accordance with national policy, the London Plan, and local priorities. We consulted previously on a draft updated West London Waste Plan and the comments received have helped shape the Proposed Submission version. If adopted, the updated West London Waste Plan will replace the current 2015 WLWP.

You have received this notification as you have previously engaged with one of the authorities through their planning consultations or we have identified you as a stakeholder. Please note that you may have been notified more than once – but you only need to respond once as all responses will be collated.

This is the final opportunity to comment before the documents are submitted to the Secretary of State for Examination, and the west London boroughs and OPDC invite representations on whether the Proposed Submission WLWP is 'sound' and 'legally compliant', including whether it is in general conformity with the London Plan.

How can I view and comment?

Ealing Council is hosting the consultation on their online portal, on behalf of the planning authorities involved. You can view the Proposed Submission WLWP and its supporting documents, including the Integrated Impact Assessment and Habitats Regulations Assessment, via Ealing Council's

online consultation portal: https://haveyoursay.ealing.gov.uk/projects/wlwp-consultation. The Statement of Representations Procedure and Statement of Fact' can be accessed with the above link. Reference copies of the Proposed Submission WLWP are also publicly available for inspection at various libraries and offices listed on the online consultation portal - more details are in the 'Statement of Representations Procedure and Statement of Fact'.

The publication period consultation closes on **Monday 28 September** (23:59). You are invited to provide feedback on the Proposed Submission WLWP and the supporting documents. You can submit your comments to us in writing by any of the following methods:

- Complete an online questionnaire on Ealing Council's online consultation portal using the above website.
- Email your completed response form to wlwasteplan@ealing.gov.uk. A PDF and a Word version of the form can be found at haveyoursay.ealing.gov.uk/projects/wlwp-consultation. In the Word version, you can type in your response and return it as an email attachment.
- Complete and post printed copies of the response form to the address given below. Printed copies are available at the selected locations listed on the consultation portal.
- Post written responses to:

  Planning and Infrastructure

  West London Alliance

  Ealing Council

  5th Floor, Perceval House

  14-16 Uxbridge Road

  Ealing, W5 2HL
- Email responses to: wlwasteplan@ealing.gov.uk

Following the completion of the publication process, all responses received will be submitted to the Government along with the WLWP and other supporting documents, for examination by an independent planning inspector. Please note that your response will not be treated as confidential and any anonymous responses will not be accepted. Responses to this consultation will be published, with any personal contact details redacted in accordance with general data protection principles.

The authorities are committed to ensuring that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles, which include keeping data secure. If

you submit comments, your consultation responses and personal data will be passed to the Planning Inspectorate and a Programme Officer. The Privacy Statement is published on the webpage: https://haveyoursay.ealing.gov.uk/projects/wlwp-consultation.

We hope that you or your organisation will continue to take an interest in the progression of the West London Waste Plan. If, however, you would prefer not to receive notifications, you can let us know.

Yours faithfully,

Strategic Planning Team

Ealing Council



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wlwasteplan

From: [redacted]
Sent: 10 August 2026 14:15
To: wlwasteplan
Subject: Odp: Notification of Proposed Submission West London Waste Plan Consultation Launch (1)

Follow Up Flag: Follow up
Flag Status: Flagged

WARNING : This Message has originated from outside your organization, If you do not trust this email please either delete or follow the guidance on OneSpace.

Dear Strategic Planning Team,

Thank you for the information regarding the proposed West London Waste Plan and the wider development and regeneration of the area.

I fully understand and support the continued development and improvement of this part of West London. However, I would also like to raise a concern regarding the increasing level of noise, dust and air pollution affecting residents along West Avenue.

In particular, I believe that the section of West Avenue between approximately [redacted] should receive additional protection. The continuous construction of new residential developments and the associated increase in traffic and construction activity have resulted in a significant increase in noise levels. For residents with bedrooms facing the road, it can be extremely difficult to sleep peacefully, particularly during periods of construction and increased traffic.

As part of the regeneration and development of the area, I would therefore kindly ask the Council and the relevant planning authorities to consider introducing **transparent acoustic and environmental barriers** along this section of West Avenue.

For example, modern **PMMA acoustic barriers** or a similar transparent noise-screening solution could help to:

- reduce continuous road and construction noise;
- provide additional protection for residents living directly alongside the road;
- reduce the amount of dust and airborne particles reaching residential properties;
- improve the overall living environment while still allowing light and visibility through the barriers.

I believe this would be a reasonable and constructive **environmental mitigation measure and community benefit** associated with the continued development of the area.

I am not opposed to development — quite the opposite. I believe that regeneration can bring significant benefits to the local community. However, as development and construction activity increase, it is important that existing residents are also protected from the additional noise, dust and environmental impact.

I would therefore be grateful if this proposal could be considered as part of the planning and regeneration process, including whether such barriers could be funded or delivered as part of the appropriate mitigation or community-benefit measures.

Thank you for taking the concerns of local residents into consideration. I would appreciate it if this request could be recorded as part of my representation to the consultation.

Kind regards,

Marcin Suwała



[redacted] **15:42** Localplan < Localplan@ealing.gov.uk >[redacted]:

Dear Consultee,

Publication of the Regulation 19 Proposed Submission West London Waste Plan – 4 August 2026 to 28 September 2026

We are writing to inform you that the west London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames, together with the Old Oak and Park Royal Development Corporation (OPDC), are publishing the proposed Submission version of the West London Waste Plan (WLWP) for comment.

This important document sets out the proposed planning strategy for waste management for these authorities up to 2041 and includes policies proposed to be used when assessing planning applications that relate to waste management development. It also identifies sites proposed to be safeguarded for waste use.

The WLWP aims to provide an up to date, sound and effective planning strategy for waste management in accordance with national policy, the London Plan, and local priorities. We consulted previously on a draft updated West London Waste Plan and the comments received have helped shape the Proposed Submission version. If adopted, the updated West London Waste Plan will replace the current 2015 WLWP.

You have received this notification as you have previously engaged with one of the authorities through their planning consultations or we have identified you as a stakeholder. Please note that you may have been notified more than once – but you only need to respond once as all responses will be collated.

This is the final opportunity to comment before the documents are submitted to the Secretary of State for Examination, and the west London boroughs and OPDC invite representations on whether the Proposed Submission WLWP is 'sound' and 'legally compliant', including whether it is in general conformity with the London Plan.

How can I view and comment?

Ealing Council is hosting the consultation on their online portal, on behalf of the planning authorities involved. You can view the Proposed Submission WLWP and its supporting documents, including the Integrated Impact Assessment and Habitats Regulations Assessment, via Ealing Council's online consultation portal: https://haveyoursay.ealing.gov.uk/projects/wlwp-consultation. The Statement of Representations Procedure and Statement of Fact' can be accessed with the above link. Reference copies of the Proposed Submission WLWP are also publicly available for inspection at various libraries and offices listed on the online consultation portal -

more details are in the 'Statement of Representations Procedure and Statement of Fact'.

The publication period consultation closes on **Monday 28 September** (23:59). You are invited to provide feedback on the Proposed Submission WLWP and the supporting documents. You can submit your comments to us in writing by any of the following methods:

- Complete an online questionnaire on Ealing Council's online consultation portal using the above website.
- Email your completed response form to wlwasteplan@ealing.gov.uk. A PDF and a Word version of the form can be found at haveyoursay.ealing.gov.uk/projects/wlwp-consultation. In the Word version, you can type in your response and return it as an email attachment.
- Complete and post printed copies of the response form to the address given below. Printed copies are available at the selected locations listed on the consultation portal.
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  Ealing, W5 2HL
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and personal data will be passed to the Planning Inspectorate and a Programme Officer. The Privacy Statement is published on the webpage: https://haveyoursay.ealing.gov.uk/projects/wlwp-consultation.

We hope that you or your organisation will continue to take an interest in the progression of the West London Waste Plan. If however you would prefer not to receive notifications, you can let us know.

Yours faithfully,

Strategic Planning Team

Ealing Council



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West London Waste Plan

Regulation 19 consultation responses collected via the web portal – redacted

To protect your personal information such as address, email address etc, some words in this document have been redacted.

Please note, the Independent Examiner will have access to the full unredacted version.

Your full name	Ross walker
Are you responding as an individual or representing another person/organisation?	As an agent on behalf of another person or organisation
Name of your organisation (if relevant)	Suffolk County Council
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	Suffolk county council are a council authority and serve as the waste planning authority for Suffolk.
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	Yes
Page number(s)	Strategically Significant Waste Flows - page 10, 14
Paragraph number(s)	data tables om the pages identified
Policy number or name	
Site number or name (see appendices to the Plan)	
Maps	
Tables	

Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	'- Suffolk is identified as the recipient of 557 tonnes of hazardous waste, while we agree the number is above the identified thresholds, we are happy these numbers are manageable and see no reason at the time of writing why this waste stream could not continue to be managed. - We note the receipt of 'minerals – based non chlorinated engine gear and lubricating oils', we acknowledge that these levels are about the identified thresholds, however the total volumes are low and we see no reason why this waste stream could not continue to be managed
Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Please share any other comments	
Legally compliant	1
Sound	1

Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	'--
Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	

Your full name	Veronica G Leon
Are you responding as an individual or representing another person/organisation?	As an individual
Name of your organisation (if relevant)	
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	No
Page number(s)	
Paragraph number(s)	
Policy number or name	
Site number or name (see appendices to the Plan)	
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	
Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	

Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Please share any other comments	It would have been more useful to know what is meant by “safeguarding”. I assume it means allocated sites as yet unnamed to be kept for rubbish dumps. As I don’t know where these sites are cannot comment.
Legally compliant	1
Sound	1
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	I have. I idea if it is legally sound as not a lawyer

Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	

Your full name	Veronica G Leon
Are you responding as an individual or representing another person/organisation?	As an individual
Name of your organisation (if relevant)	
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	No
Page number(s)	
Paragraph number(s)	
Policy number or name	
Site number or name (see appendices to the Plan)	
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	
Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your	

comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Please share any other comments	It would have been more useful to know what is meant by “safeguarding”. I assume it means allocated sites as yet unnamed to be kept for rubbish dumps. As I don’t know where these sites are cannot comment.
Legally compliant	1
Sound	1
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	I have. I idea if it is legally sound as not a lawyer
Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	

Your full name	Victoria Hollertz
Are you responding as an individual or representing another person/organisation?	As an individual
Name of your organisation (if relevant)	
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	Yes
Page number(s)	pages 71–75
Paragraph number(s)	All
Policy number or name	Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities
Site number or name (see appendices to the Plan)	
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	Consultation Response: Proposed Submission West London Waste Plan (Regulation 19) Respondent: Victoria Hollertz, Local resident, [redacted] Policies commented on: WLWP 1 (Safeguarding and optimising waste site network) and WLWP 4 (Ensuring high quality and resilient waste facilities) I am writing as a local resident [redacted] Powerday waste site. I wish to comment on Policy WLWP 4 and Policy WLWP 1 as they relate to this site. Over the years [redacted], air quality and odour from the site appear to have improved, and I understand some nearby illegal waste operations have since been closed, which I welcome. However, the local area

	continues to suffer from a significant fly infestation, particularly in warmer months. Given the nature and scale of waste handled at the site, I believe this is very likely linked to on-site waste storage and processing, though I have not seen this formally investigated. I would like the Plan to ensure that: 1. Policy WLWP 4 explicitly requires pest management (not just odour and dust control) as a condition of continued operation for safeguarded sites handling putrescible or mixed waste 2. Ongoing monitoring and enforcement mechanisms are in place so residents can report and have investigated amenity impacts such as pest infestations, with a clear route for complaints to be acted on 3. Continued safeguarding of the site under Policy WLWP 1 is linked to demonstrable, monitored compliance with amenity protections, not treated as unconditional. I support the principle of maintaining London's waste management capacity, but this must go hand in hand with robust protections for residents' quality of life. I would also ask that the Plan consider, over the plan period, whether sites such as Powerday remain appropriately located. This area has become increasingly residential in character since the site was first established, and it seems increasingly at odds with its surroundings to retain a large-scale waste processing operation in what is no longer a predominantly industrial location. Where opportunities arise to relocate such facilities to more appropriately zoned, less residential areas with equivalent or greater capacity provided elsewhere, this should be actively pursued rather than defaulting to indefinite safeguarding in situ. I want to be clear about the personal impact of this: unless operations at the site are significantly scaled back, or the amenity issues raised above (particularly pest control) are

	properly addressed, this is a factor that will influence my own decision about whether to continue living in the area long-term. I do not believe residents should be placed in a position where ongoing quality of life [redacted] of this scale depends on voluntary improvement rather than enforceable policy. In the meantime, and for as long as the site remains, the conditions set out above regarding pest control, monitoring and enforcement should apply.
Do you have any additional comments on the Integrated Impact Assessment Report?	Yes
Page number(s)	24
Paragraph number(s)	1.52 and 1.53
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	My concern is corroborated by the Plan's own evidence base. The Integrated Impact Assessment (Non-Technical Summary, July 2026, para 1.52) identifies "pests and vermin" as a potential impact pathway from the Plan's policies, including Policy WLWP 1 (para 1.53), and states that mitigation of this risk is reliant on the safeguards in Policy WLWP 4. However, the IIA's own scoring of Policy WLWP 4 against the Health and Wellbeing objective (Table 4) records this effect as uncertain. This uncertainty should be resolved by strengthening Policy WLWP 4 to include explicit, monitored pest control requirements, rather than relying on an assumed but unverified safeguard.
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has	

been developed in line with legal requirements.	
Please share any other comments	1. Evidence base for the Integrated Impact Assessment (IIA): The IIA Non-Technical Summary (July 2026) records the effect of Policy WLWP 4 on the Health and Wellbeing objective as uncertain (Table 4, "++/-?"), and the Habitats Regulations Assessment screening (referenced at IIA paras 1.52–1.53) identifies pests and vermin as an impact pathway that could not be ruled out from several of the Plan's policies, including WLWP 1. I do not believe the evidence base currently includes any monitoring data on pest or vermin complaints associated with existing safeguarded sites, such as those bordering residential areas [redacted]. I would ask that this data gap be addressed, either through the Monitoring Framework (Appendix 1) or as part of the evidence supporting Policy WLWP 4, so that the uncertainty flagged in the IIA can be properly resolved rather than carried forward unaddressed into the adopted Plan. 2. Alternative approach: monitoring as a plan requirement: Rather than leaving pest and amenity management to be addressed only through individual planning conditions on a site-by-site basis, I would suggest the Plan consider a standing requirement for safeguarded sites handling putrescible or mixed waste to report pest control data (e.g. complaint numbers, remedial actions taken) to the relevant Local Planning Authority on a regular basis, with this data published through the Authority Monitoring Report process already described in the Plan (para 2.12, Appendix 1). This would give residents a transparent, ongoing means of assessing whether Policy WLWP 4's protections are being delivered in practice, rather than relying on ad hoc complaints.
Legally compliant	2
Sound	2
Please give details of why you consider the Waste Plan is not legally compliant or is	No, the Plan is not sound in relation to Policy WLWP 4 (Ensuring High Quality and Resilient Waste Facilities). Policy WLWP 4 is relied upon

unsound, using the box below to set out your comments.	(see para 8.29 of the Plan, and paras 1.52–1.53 of the accompanying Integrated Impact Assessment) as the primary mitigation for amenity impacts, including pest and vermin risk, arising from safeguarded waste sites. However, the IIA's own appraisal records this effect as uncertain (Table 4), and the policy as currently drafted does not include an explicit, monitored requirement for pest control at sites handling putrescible or mixed waste. As drafted, the Plan is therefore not effective in delivering the protection it is assumed to provide, based on my own experience [redacted]. I am not objecting to the Plan as a whole, which I consider sound in other respects.
Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	I would also note that a complaints route already nominally exists: residents can contact the Old Oak and Park Royal Development Corporation (OPDC), which has planning authority over this part of the site. However, in my experience, submitting reports through this channel has not resulted in any visible action or improvement regarding the fly infestation. This demonstrates that the absence of a formal, monitored pest control requirement in Policy WLWP 4 is not a theoretical gap it is already resulting in unresolved amenity impacts on residents, despite an existing point of contact being available.
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	

Your full name	Angela Martin
Are you responding as an individual or representing another person/organisation?	As an individual
Name of your organisation (if relevant)	
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	Yes
Page number(s)	YouTube video
Paragraph number(s)	YouTube video
Policy number or name	Landfill
Site number or name (see appendices to the Plan)	
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	I am pleased that the committment is to not use landfill sites unless in extreme circumstances. I would like to know if Ealing Council and residents will be compensated for taking in waste from other boroughs. This will involve work plus further pressure and wear and tear on our roads. I hope that the change doesn't mean there will be more heavy lorries on our roads, adding to pollution plus danger to pedestrians, cyclists and other road users. Does this plan go against the borough's aims to be greener and safer?
Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No

Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Please share any other comments	I would appreciate a shorter report than those being made available. I went to download the first one, saw it was 209 pages long and decided to watch the YouTube video instead. Is there more than one video? It's not clear but it seems more are needed, to cover the last two topics mentioned on this questionnaire. I am interested in hearing about the habitat assessment and any pollution impact assessments.
Legally compliant	1
Sound	1
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	If there had been an option to click 'i don't know', that's what I would have put in the box above. I think it would have been good to group all the executive summaries of the different reports together. This amount of information is overwhelming to the general public.
Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	Give information in shorter formats, while linking to the long reports too.
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	

Your full name	Mohamed Hanafy
Are you responding as an individual or representing another person/organisation?	As an individual
Name of your organisation (if relevant)	
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	Yes
Page number(s)	Not specified (relates to the overall strategy and spatial approach of the Plan)
Paragraph number(s)	Not specified (relates to the overall strategy and spatial approach of the Plan)
Policy number or name	
Site number or name (see appendices to the Plan)	
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	I consider that the Proposed Submission West London Waste Plan requires further justification to demonstrate that it is the most appropriate strategy when considered against reasonable alternatives. The Plan proposes to retain and safeguard land within West London for waste management uses. However, given the exceptional shortage and high value of land within London, the Plan should provide clearer evidence that allocating valuable industrial land for waste facilities represents the most sustainable and effective use of land compared with alternative approaches, including larger strategic waste management facilities located outside Greater London. The Plan should demonstrate that it has properly assessed the economic, environmental and transport implications of alternative waste management models, including whether fewer, larger facilities could achieve economies of scale, improved resource recovery, reduced operational costs and better use of modern waste treatment

	technologies. While the proximity principle is an important consideration, the Plan should also assess whether the environmental impacts of transporting waste longer distances could be reduced through alternative transport methods such as rail freight. A balanced assessment should consider total carbon emissions, land use efficiency, congestion impacts and the wider benefits of releasing London land for housing, employment and other strategic needs. Without a transparent comparison of these alternatives, I do not consider that the Plan has demonstrated that its chosen approach is the most appropriate strategy based on proportionate evidence. Further evidence should be provided to demonstrate that the spatial distribution of waste facilities represents the best balance between waste management needs, sustainability objectives and the efficient use of scarce land resources. I therefore consider that the Plan may not fully meet the soundness tests of being justified and effective, as it has not demonstrated that all reasonable alternatives have been adequately considered.
Do you have any additional comments on the Integrated Impact Assessment Report?	Yes
Page number(s)	Na
Paragraph number(s)	Na
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	The Integrated Impact Assessment appears to assess the impacts of the proposed West London Waste Plan approach, but I have concerns that it does not give sufficient consideration to alternative waste management strategies. In particular, the assessment should provide clearer evidence comparing the proposed approach of retaining significant waste capacity within West London against a model based on fewer, larger strategic facilities outside Greater London. Such an assessment should consider: * the environmental impact of transporting waste longer distances, including the potential use of rail freight;

	* whether larger facilities could provide improved efficiency, resource recovery and reduced operational impacts; * the opportunity cost of using scarce London industrial land for waste management instead of housing, employment and other strategic uses; * the potential economic and regeneration benefits of locating some facilities in areas with greater land availability. Without a transparent comparison of these reasonable alternatives, it is difficult to conclude that the proposed strategy represents the most sustainable option.
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Please share any other comments	I would like the Plan to give greater consideration to an alternative approach based on fewer, larger, strategically located waste management facilities that are designed to be adaptable and future-proof. Larger facilities may provide greater opportunities to invest in advanced sorting, recycling and resource recovery technologies. As recycling requirements and waste streams continue to change, larger sites may be easier to retrofit and upgrade compared with multiple smaller facilities where space, access and investment capacity may be more constrained. A more strategic approach could also support the circular economy by allowing recovered materials to be processed and transferred efficiently to appropriate manufacturers and end users. This may reduce unnecessary vehicle movements associated with transporting similar materials from multiple smaller sites to common processing locations. The Plan should therefore consider whether a network based on larger, flexible facilities, supported by efficient collection and transfer

	arrangements, could provide better long-term value, improved resource recovery and greater resilience than maintaining a larger number of smaller sites. This assessment should include consideration of: * future changes in recycling technology and waste streams; * the ability to retrofit and expand facilities; * overall transport movements and carbon impacts; * the efficiency of moving recovered materials into the circular economy; * the opportunity cost of using scarce London land for waste infrastructure compared with other strategic needs. A longer-term waste strategy should not only meet current capacity requirements but should also ensure that infrastructure remains adaptable for future environmental and technological changes.
Legally compliant	1
Sound	2
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	I consider that the West London Waste Plan is legally compliant, but I have concerns that it is not fully sound because the evidence base does not appear to demonstrate that the proposed spatial approach is the most appropriate strategy when considered against reasonable alternatives. The Plan should provide clearer evidence that retaining significant waste management capacity within West London is the most sustainable and effective approach, particularly given the shortage and high value of land within London. The Plan should more fully assess alternative approaches, including a model based on fewer, larger, strategically located waste management facilities outside Greater London, potentially supported by efficient transfer arrangements and rail freight where appropriate. Such an approach could provide: * greater economies of scale; * improved ability to invest in advanced recycling and resource recovery technologies;

	* facilities that are easier to expand and retrofit as recycling requirements change; * more efficient integration with the circular economy by concentrating recovered materials processing closer to suitable manufacturing uses; * potential release of scarce London industrial land for housing, employment and other strategic priorities. The current approach should demonstrate, through evidence, why multiple smaller facilities within West London provide greater overall sustainability benefits than alternative strategic options. This should include a comparison of: * whole-life carbon impacts; * transport movements; * congestion effects; * land use efficiency; * future adaptability of facilities; * economic and regeneration impacts. Without this assessment, the Plan does not sufficiently demonstrate that it represents the most appropriate strategy based on proportionate evidence. I therefore consider that the Plan is not fully justified and may not meet the soundness tests.
Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	The Plan should be amended to include a stronger assessment of reasonable alternatives, including larger strategic waste management facilities outside Greater London, and provide clear evidence explaining why the chosen spatial strategy delivers the best balance of environmental, economic and social outcomes. The supporting evidence base should be updated to demonstrate how alternative approaches were assessed and why the proposed allocation of waste infrastructure within West London is preferred.
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	

Your full name	Tajinder Panesor
Are you responding as an individual or representing another person/organisation?	As an individual
Name of your organisation (if relevant)	
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	No
Page number(s)	
Paragraph number(s)	
Policy number or name	
Site number or name (see appendices to the Plan)	
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	
Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear	

to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Please share any other comments	
Legally compliant	1
Sound	1
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	n/a
Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	

Your full name	Mary helen Pius
Are you responding as an individual or representing another person/organisation?	As an individual
Name of your organisation (if relevant)	
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	No
Page number(s)	
Paragraph number(s)	
Policy number or name	
Site number or name (see appendices to the Plan)	
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	
Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear	

to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Please share any other comments	
Legally compliant	1
Sound	1
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	None
Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	

Your full name	Paul Massey
Are you responding as an individual or representing another person/organisation?	As an individual
Name of your organisation (if relevant)	
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	Yes
Page number(s)	all
Paragraph number(s)	all
Policy number or name	
Site number or name (see appendices to the Plan)	
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	I wish to record that I strongly oppose the West London wastewater plan. Given the history of failed sewage treatment dumping in the Thames, I cannot trust Thames water to conform. In addition, the idea of legally pumping treated sewage into our Thames river appals me particularly as some Richmond residents use the Thames for bathing and other water sports and environmentally it would be a disaster. Paris has shown that it appreciates the benefit of the cleanliness of its precious river resource. London should do likewise. If this proposal is agreed, it would allow the water companies an easy option to excessively dump sewage without limits or recourse.
Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has	

been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Please share any other comments	Build more reservoirs
Legally compliant	2
Sound	2
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	Local communities have been bypassed. A project of this scale should face proper local scrutiny. This isn't just about London. It's about protecting rivers across the UK and holding water companies to higher standards. If this can happen here, it can happen anywhere
Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	Yes, I wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	

Your full name	Paul Bacchus
Are you responding as an individual or representing another person/organisation?	As an individual
Name of your organisation (if relevant)	
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	No
Page number(s)	
Paragraph number(s)	
Policy number or name	
Site number or name (see appendices to the Plan)	
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	
Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	

Please share any other comments	Vehicle movement.
Legally compliant	1
Sound	1
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	Vehicle movement
Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	

Your full name	Adham Aloka
Are you responding as an individual or representing another person/organisation?	As an individual
Name of your organisation (if relevant)	
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	No
Page number(s)	
Paragraph number(s)	
Policy number or name	
Site number or name (see appendices to the Plan)	
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	
Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has	

been developed in line with legal requirements.	
Please share any other comments	
Legally compliant	1
Sound	2
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	The West London Waste Plan (WLWP) fails the tests of soundness on two primary fronts: it is not Justified (lacking a proportionate, equitable evidence base) and it is not Effective (lacking deliverable, enforceable mechanisms to protect residential communities and drive environmental change). 1. Unjustified Spatial Inequality (Policy WLWP 1) The programme rigidly safeguards the existing network of waste sites without providing an equitable framework for the future. By locking in historical industrial categorisations, the plan forces traditionally industrialised and lower-income wards to perpetually shoulder the severe externalities of waste management—namely HGV traffic, noise, and air pollution—through to 2041. Wealthier, non-industrial boroughs are effectively permitted to export their waste footprint. An evidence base that permanently centralises environmental degradation in specific neighbourhoods while ignoring the necessity for equitable burden-sharing is fundamentally unjustified. 2. Ineffective Decarbonisation and the Incineration Loophole (Policy WLWP 3) The plan fails to align with stringent regional and national net-zero targets. The continued reliance on "energy recovery" acts as a bureaucratic shield for waste incineration. Permitting long-term incineration capacity disincentivises true recycling and creates a perpetual demand for residual waste to feed these facilities. This renders the broader environmental and circular economy objectives ineffective and internally contradictory. 3. Unenforceable Circular Economy Provisions (Policy WLWP 6) While the theoretical ambition of Policy WLWP 6 is welcome, the current drafting is performative rather than effective. The policy lacks robust, quantifiable metrics. Without hard regulatory thresholds, local planning committees will struggle to enforce these provisions against developers. A policy that relies on aspirational language without providing a definitive, measurable mechanism for enforcement is unsound.

Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	To make the WLWP sound, the following modifications must be integrated prior to submission: Modification to Policy WLWP 1 (Safeguarding): Introduce a Spatial Redistribution Mandate Suggested Revision: Amend the policy to include a requirement that all constituent boroughs, regardless of their current industrial land capacity, must identify and allocate localised sites for micro-processing, high-value repair, and circular economy infrastructure. Why this makes it sound: This ensures the plan is positively prepared and justified by distributing the environmental and infrastructural responsibilities equitably across all West London communities, rather than entrenching historical neighbourhood inequalities. Modification to Policy WLWP 3 (Energy Recovery): Implement Strict Carbon-Intensity Caps Suggested Revision: Insert a definitive moratorium on the approval of any new mass-burn incineration facilities. Furthermore, introduce a phased, quantifiable reduction target for existing energy-from-waste reliance by 2041, tied strictly to local air quality monitoring data. Why this makes it sound: This resolves the internal contradiction with Policy WLWP 6 and ensures the plan is consistent with national net-zero policy. It forces operators to pivot towards high-value material recovery rather than relying on high-emission disposal. Modification to Policy WLWP 6 (Circular Economy): Mandate Quantifiable Thresholds Suggested Revision: Replace the existing aspirational text with hard operational metrics. For example: "All new waste management applications must legally demonstrate that a minimum of [X]% of the facility's capacity is exclusively ring-fenced for reuse, repair, or high-value recycling processes before planning permission is granted." Why this makes it sound: This modification makes the policy effective and deliverable. It provides local planning committees with the precise, unambiguous regulatory leverage needed to reject substandard applications and actually enforce the circular economy transition.
If your representation is seeking a modification to the plan, do you consider	No, I do not wish to participate in hearing session(s)

it necessary to participate in examination hearing session(s)?	
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	

Your full name	Tony Leigh
Are you responding as an individual or representing another person/organisation?	As an individual
Name of your organisation (if relevant)	
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	No
Page number(s)	
Paragraph number(s)	
Policy number or name	
Site number or name (see appendices to the Plan)	
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	
Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	

Please share any other comments	Waste management is a huge undertaking for any organisation - certainly bigger than I initially realised. Nevertheless, some sort of summary document would have been useful. The video was helpful but too full of jargon. From what I understood, my views align with Ealing Local Authority. Landfill has to be a last resort (is destroying by burning an option/used?), recycling and upcycling need to be prioritised. Would be interested to understand how and where recycling takes place. Hopefully, not a dodgy deal with a third world country. Expanding food waste recycling to flats would also be welcome. Obviously, as with such venture, the vagaries of other stakeholders (govt/corporations) presumably play a part too. Many thanks, Tony
Legally compliant	1
Sound	1
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	n/a - to be honest my knowledge of this complex issue doesn't allow comment on legality.
Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	As above.
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	Yes, I wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	To better understand the processes and complexities involved. Not necessarily to argue an alternative view.

Your full name	Pamela Esther Mayorcas
Are you responding as an individual or representing another person/organisation?	As an individual
Name of your organisation (if relevant)	I don't have one
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	No
Page number(s)	
Paragraph number(s)	
Policy number or name	
Site number or name (see appendices to the Plan)	
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	
Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to	

which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Please share any other comments	It is impossible for an ordinary member of the public to a) read; b) comprehend (it is full of jargon); c) comment on this so-called consultation. Nowhere do I find the words 'plastic' or 'hard plastic' mentioned anywhere. This is one of 'the' most prevalent materials in our daily lives, one of the most difficult to recycle. So far as I can tell, not only is there no mention of 'plastic waste' in the enormously long and unreadable document, there is nothing whatsoever to explain/suggest how an ordinary member of the public can get rid of plastic waste, in all its forms, in an environmentally-responsible way. Most household cleaning equipment (brooms, buckets, cloths) are made of plastic, most cosmetic products are sold in plastic containers, most household cleaning products come in plastic containers, most office equipment (ring binders, see-through pockets and folders) are plastic, despite the efforts (so they claim) of the supermarkets, the majority of fruit and vegetables come in plastic containers, or plastic bags. Even spring onions, which now have a paper label, the label has a hard plastic piece that attaches the label to the rubber band around the spring onions. Almost all home decorating items are made from plastic. Curtain hooks and rings are made from plastic. When, oh when, oh when, will we - as a society - learn that we cannot continue to import (at enormous environmental cost) such items from China, half-way around the globe, and gaily chuck these into our waste bins, then - presumably - into the black sacks that are collected from households on a fortnightly basis, without damaging the environment, our children's health, the health of the world? As I said, I could not find one single solitary mention of the word 'plastic' or 'plastic waste' in this enormously long document. No doubt it cost a great deal of money to commission this document. It is of no use whatsoever, either to me - as an individual member of the public - nor (I venture to suggest) to local authorities because the word 'plastic' does not appear, nor is there anything in the document to explain how plastic waste should be collected

	and dealt with. Without such an explanation, one can only assume it is all going into landfill.
Legally compliant	2
Sound	2
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	See my previous comments.
Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	Yes, I wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	I wish to quiz the local authority representatives and the authors of the report as to why there is no mention of the word 'plastic' or 'plastic waste' in the document, and how local authorities plan to do dispose of plastic waste in an environmentally-responsible manner.about

Your full name	Arjan Singh Sandhu
Are you responding as an individual or representing another person/organisation?	As an individual
Name of your organisation (if relevant)	
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	No
Page number(s)	
Paragraph number(s)	
Policy number or name	
Site number or name (see appendices to the Plan)	
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	
Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear	

to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Please share any other comments	
Legally compliant	1
Sound	1
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	I believe it to be fully compliant.
Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	Yes, I wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	I think these will be ideal for people who do not know how to use the internet to voice their opinions.

Your full name	Mari Honda-Wulf
Are you responding as an individual or representing another person/organisation?	As an individual
Name of your organisation (if relevant)	
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	Yes
Page number(s)	General
Paragraph number(s)	General
Policy number or name	Circular economy
Site number or name (see appendices to the Plan)	N/A
Maps	N/A
Tables	N/A
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	My feedback is not on 'Waste Sites' which deemed to be the primary focus of the plans, but "each citizen's participation in Circular Economy"; i.e. how to tackle with HIC wastes, while C&D etc wasted cannot be controlled from the individual level. As I commented some years ago, from a personal citizenship level (as working on a residential association committee), UK population's manner & behaviour with wastes have been found one of the worst in the OECD countries; littering, dumping, little knowledge on recyclable items (I have lived here over 30 years with international travelling experiences). I have suggested (1) the councils should work on educating the population through bills and mails or at public facilities, how to reduce & recycle the wastes, detailing how each recyclables are treated in the chain of circular economy; paper, cans, glasses and plastics should be the mains from households, (2) please introduce ASAP to install cans & bottles (glasses & plastics) recycling points for credit (like 10-20p per item) at major supermarkets as most continental European countries introduced decades ago.
Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	

Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Please share any other comments	My feedback is not on 'Waste Sites' which deemed to be the primary focus of the plans, but "each citizen's participation in Circular Economy"; i.e. how to tackle with HIC wastes, while C&D etc wasted cannot be controlled from the individual level. As I commented some years ago, from a personal citizenship level (as working on a residential association committee), UK population's manner & behaviour with wastes have been found one of the worst in the OECD countries; littering, dumping, little knowledge on recyclable items (I have lived here over 30 years with international travelling experiences). I have suggested (1) the councils should work on educating the population through bills and mails or at public facilities, how to reduce & recycle the wastes, detailing how each recyclables are treated in the chain of circular economy; paper, cans, glasses and plastics should be the mains from households, (2) please introduce ASAP to install cans & bottles (glasses & plastics) recycling points for credit (like 10-20p per item) at major supermarkets as most continental European countries introduced decades ago.
Legally compliant	1
Sound	1
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	N/A

Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	N/A
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	

Your full name	Linda Rosemary Green
Are you responding as an individual or representing another person/organisation?	As an individual
Name of your organisation (if relevant)	
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	Yes
Page number(s)	4
Paragraph number(s)	1.3
Policy number or name	Drainage
Site number or name (see appendices to the Plan)	Preston, Wembley, Bren
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	Re Surface water drainage in Wembley, in all documents in which it is referred to. I live in [redacted], [redacted]. We are at a strong risk of flooding because Brent does not maintain the drainage system. It is insulting to residents to talk about educating them about how to deal with surface water when Brent is not fulfilling its statutory duties. The road drains in my street have not been maintained since the early 1990s. I walked the street with a councillor who photographed all the road drains which were silted up. Every road drain we looked at in my street had visible soil/silt in it near the top of the drain. The one outside my house has ash tree seedlings growing it. The Council does not even remove the leaves that cover up the drains so it can be hard to find them. In a heavy downpour, I have seen the rainwater flood to the front door of the house on the corner of my street and [redacted], and I have had water coming up through house drains instead of going down. I have seen water flowing down the shops area of [redacted] Road to the extent that if you crossed the road it would reach the top of your shoes. The roundabout on [redacted] often floods and stays like it for several days. I have reported

	all this many times to no avail. I presume this consultation is costing thousands and using thousands of hours of officer time, all of which would be better spent on clearing drains so that water has a place to drain away in the now common severe rain storms. The whole report is meaningless unless if contains a Borough commitment to clear land drains at regular intervals. This is the most important flood prevention measure that could be made.
Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Please share any other comments	Re Surface water drainage in Wembley, in all documents in which it is referred to. I live in [redacted], [redacted]. We are at a strong risk of flooding because Brent does not maintain the drainage system. It is insulting to residents to talk about educating them about how to deal with surface water when Brent is not fulfilling its statutory duties. The road drains in my street have not been maintained since the early 1990s. I walked the street with a councillor who photographed all the road drains which were silted up. Every road drain we looked at in my

	street had visible soil/silt in it near the top of the drain. The one outside my house has ash tree seedlings growing it. The Council does not even remove the leaves that cover up the drains so it can be hard to find them. In a heavy downpour, I have seen the rainwater flood to the front door of the house on the corner of my street and [redacted], and I have had water coming up through house drains instead of going down. I have seen water flowing down the shops area of [redacted] Road to the extent that if you crossed the road it would reach the top of your shoes. The roundabout on [redacted] often floods and stays like it for several days. I have reported all this many times to no avail. I presume this consultation is costing thousands and using thousands of hours of officer time, all of which would be better spent on clearing drains so that water has a place to drain away in the now common severe rain storms. The whole report is meaningless unless if contains a Borough commitment to clear land drains at regular intervals. This is the most important flood prevention measure that could be made.
Legally compliant	2
Sound	2
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	Re Surface water drainage in Wembley, in all documents in which it is referred to. I live in [redacted]. We are at a strong risk of flooding because Brent does not maintain the drainage system. It is insulting to residents to talk about educating them about how to deal with surface water when Brent is not fulfilling its statutory duties. The road drains in my street have not been maintained since the early 1990s. I walked the street with a councillor who photographed all the road drains which were silted up. Every road drain we looked at in my street had visible soil/silt in it near the top of the drain. The one outside my house has ash tree seedlings growing it. The Council does not even remove the leaves that cover up the drains so it can be hard to

	find them. In a heavy downpour, I have seen the rainwater flood to the front door of the house on the corner of my street and [redacted], and I have had water coming up through house drains instead of going down. I have seen water flowing down the shops area of [redacted] Road to the extent that if you crossed the road it would reach the top of your shoes. The roundabout on [redacted] often floods and stays like it for several days. I have reported all this many times to no avail. I presume this consultation is costing thousands and using thousands of hours of officer time, all of which would be better spent on clearing drains so that water has a place to drain away in the now common severe rain storms. The whole report is meaningless unless if contains a Borough commitment to clear land drains at regular intervals. This is the most important flood prevention measure that could be made.
Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	Yes, I wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	

Your full name	Jacob Gilkes
Are you responding as an individual or representing another person/organisation?	As an individual
Name of your organisation (if relevant)	
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	Yes
Page number(s)	49
Paragraph number(s)	7.8
Policy number or name	
Site number or name (see appendices to the Plan)	
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	Residents of [redacted] at the very edge of the Richmond borough are a long drive from the Reuse and Recycling Centres within the Richmond borough. This creates additional pollution and traffic. The Kingston Household Reuse and Recycling Centre is much closer and so in connection with arrangements to share capacity in conjunction with the London Plan arrangements should be made with Kingston borough for those who are much closer to the Kingston site to use that site
Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to	

which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Please share any other comments	
Legally compliant	1
Sound	1
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	n/a
Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	

Your full name	Michael Singham
Are you responding as an individual or representing another person/organisation?	As an agent on behalf of another person or organisation
Name of your organisation (if relevant)	Richmond & Wandsworth Councils
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	Other (please state what your specific interest in West London might be)
Type your answer	Responding on behalf of Richmond Council's Waste Service
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	No
Page number(s)	
Paragraph number(s)	
Policy number or name	
Site number or name (see appendices to the Plan)	
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	
Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound	

and has been developed in line with legal requirements.	
Please share any other comments	
Legally compliant	1
Sound	1
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	N/a
Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	

Your full name	Calum Chipman
Are you responding as an individual or representing another person/organisation?	As an agent on behalf of another person or organisation
Name of your organisation (if relevant)	London Borough of Lambeth
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	Other (please state what your specific interest in West London might be)
Type your answer	London Borough
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	Yes
Page number(s)	3, 13, 35, 36, 49, 50
Paragraph number(s)	1.8, 3.3, 5.46, 5.43-5.44, 7.8-7.9, 7.10-7.13
Policy number or name	
Site number or name (see appendices to the Plan)	
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	Pages: 3, 13, 35 Paragraphs: 1.8, 3.3, 5.46 Policy: N/A The Plan notes that Heathrow Airport expansion may place pressure on existing waste sites and could necessitate an early review of the Plan. Lambeth supports ongoing monitoring of this issue given the potential implications for strategic waste management capacity across London. Pages: 35-36 Paragraphs: 5.43-5.44 Safeguarding Existing Waste Sites The Plan identifies that surplus capacity may justify the release of safeguarded waste sites without replacement capacity being provided. Lambeth suggests that decisions on future site release should continue to have regard to London's wider objective of maintaining sufficient waste management capacity and achieving net self-sufficiency. Pages: 49

	Paragraphs: 7.8-7.9 Providing for Unmet Needs from Elsewhere within London Lambeth welcomes the recognition that West London's identified surplus waste management capacity may contribute towards meeting needs arising elsewhere in London. However, the Plan could provide greater clarity on how future capacity-sharing arrangements will be secured, monitored and reviewed, particularly in light of the emerging London Plan and any changes to borough waste apportionments. Pages: 50 Paragraphs: 7.10-7.13 Policy WLWP 1 / Future Waste Management Capacity in West London The Plan proposes releasing safeguarded waste sites and not allocating land for additional waste management facilities on the basis that sufficient capacity exists. Given ongoing pressure on industrial land across London, Lambeth recommends continued monitoring of available capacity and an appropriate review mechanism should capacity requirements change during the plan period.
Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to	

which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Please share any other comments	Lambeth Council welcomes the opportunity to comment on the Proposed Submission West London Waste Plan. Whilst Lambeth is not part of the West London Waste Plan area, the borough has an interest in the effective planning and provision of waste management capacity across London, particularly in relation to the London Plan objective of net self-sufficiency and the management of strategic cross-boundary waste movements. The comments provided are therefore limited to strategic matters that may have implications beyond the Plan area and affect London's wider waste management network.
Legally compliant	1
Sound	1
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	N/A
Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	

Your full name	Moosa Abuelzein
Are you responding as an individual or representing another person/organisation?	As an individual
Name of your organisation (if relevant)	Agency
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	No
Page number(s)	
Paragraph number(s)	
Policy number or name	
Site number or name (see appendices to the Plan)	
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	
Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear	

to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Please share any other comments	Within the law of the waste management. it needs to be fairer due to the economy struggle and keeping the environment clean
Legally compliant	1
Sound	1
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	Alright.
Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	Alright
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	

Your full name	Rupert Penny
Are you responding as an individual or representing another person/organisation?	As an individual
Name of your organisation (if relevant)	
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	No
Page number(s)	
Paragraph number(s)	
Policy number or name	
Site number or name (see appendices to the Plan)	
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	
Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	

Please share any other comments	1. To help reduce fly tipping & it's associated cleanup costs, make official waste disposal quick, cheap & easy - largely funded by a proportional surcharge on new items. 2. To help reduce waste to landfill and to increase transitional electricity supply & diversity, repurpose coal fired power station sites with comparatively clean (high temperature) incinerators generating electricity from non-recyclable waste. 3. To help reduce vehicle pollution and it's health & climate consequences, prioritise emission reductions in transport & delivery vehicle fleets (that are on the road for most of the day on most days). 4. To potentially massively reduce pollution inc Ultra Fine Particles (UFPs) around airports, have 'Aviation ULEZs' for planes to use mainly cleaner Synthetic Aviation Fuel (SAF) or similar for taxiing, take-off & landing (plus ever greater use in fuel blends in cruise too). If verification of individual flight's observance of an Aviation ULEZ is necessary but difficult, mandatory fuelling with sufficient SAF for taxiing & take-off might suffice.
Legally compliant	1
Sound	1
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	N/A
Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	N/A
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	

Your full name	Ruth Mayorcas
Are you responding as an individual or representing another person/organisation?	As an individual
Name of your organisation (if relevant)	N/A
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	No
Page number(s)	
Paragraph number(s)	
Policy number or name	
Site number or name (see appendices to the Plan)	
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	
Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to	

which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Please share any other comments	It is seriously very disappointing to see the lack of ambition to reduce either single use plastic use or even biodegradeable products. Where is the attempt to reduce the use of these as much as possible by demanding that shops introduce charging for single use plastic wrap as they have for carrier bags and that biodegradeable does not mean it biodegrades unless in an industrial machine - likewise composting. So much waste is generated by takeaway food - the user should have to pay and the companies need to be taxed to make them reduce the use. Much of the abbove waste is thrown in street bins and is not recycled nor composted nor biodegraded.
Legally compliant	1
Sound	2
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	It is unsound as it is simply not good enough for the mountain of waste being generated.
Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	All takeaway food containers must be charged for and Councils can lead the way by making sure this happens in all Council properties or events held on council land eg festivals.
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	Yes, I wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	Because it is impossible to accurately portray my comments in writing.

Your full name	Charlie Wan
Are you responding as an individual or representing another person/organisation?	As an agent on behalf of another person or organisation
Name of your organisation (if relevant)	Rapleys LLP
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	Yes
Page number(s)	115
Paragraph number(s)	B02
Policy number or name	
Site number or name (see appendices to the Plan)	B02
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	URBAN PROP 8 S.A.R.L achieved planning permission for the removal of a waste transfer site with the erection of a flexible industrial use at Aggregate House, 100 Twyford Abbey Road, NW10 7XE (Planning Reference: 23/0178/FUMOPDC). The compensatory provision is to be provided at 'land off Collett Way' in the London Borough of Ealing (Planning Reference: 2405602FUL). The applicant for this proposal is Rail Logistics Consultancy Ltd. The planning permission was granted 18 February 2026. The proposed compensatory waste facility at Collett Way has been designed to process and transfer 150,000 tonnes of waste per annum and will be able to treat Municipal, Commercial and Industrial (MCI) and Construction Demolition Excavation (CDE) waste streams which is a higher throughput of waste than the maximum capacity assessed at 100 Twyford Abbey Road (when it was operational). A permit has been received from the Environment Agency (ref. EPR/FP3522SD/V002), allowing the total quantity of waste accepted at the site to be no more than 150,000 tonnes per year. The permit was submitted to OPDC to discharge Clause S1, 2.2(b) of the S106 Agreement of Planning Reference: 23/0178/FUMOPDC. A

	discharge notice was received on 15 September 2026, confirming that Clause S1, 2.2(b), which states that “The Owner shall: 2.2 Not to Commence the Development until: (b) a bespoke environmental permit has been issued by the Environment Agency to enable Phase 1 of the Compensatory Waste Facility to be operational; and”, has been discharged. All pre-commencement conditions relating to the compensatory site at Collett Way (Planning Reference: 2405602FUL) have been discharged. Construction of the compensatory waste facility is now ongoing and progressing towards the discharge of the prior-to-occupation conditions. The majority of the prior-to-occupation condition applications have been submitted to Ealing Council and are currently under review. Below is a summary of the completed works: • Groundworks commenced. • Foundations for the frame were started. • The existing building was demolished, and all remaining foundations and pits within the build area were removed. • The roof of the waste facility has been completed. The site at 100 Twyford Abbey Road (Appendix 2, Site B02) continues to be safeguarded with a footnote that the site has planning permission for alternative use. The footnote identifies that Site E20, Collett Way, has been identified as compensatory provision for Site B02, with the footnote for this Site stating that the process to secure provision still has to be completed. As such B02 remains safeguarded until provision is secured at Collett Way. As the planning permission for the compensatory waste facility at Site E20 (Planning Reference: 2405602FUL) has been implemented, with construction having commenced and progressing rapidly towards practical completion, the adopted plan should remove Site B02 from Appendix 2: List of Safeguarded Waste Sites to avoid any confusion. Site E20 at Collett Way is referred to as being operated by Wards of London Properties Ltd, although this should be amended and only referred to Rail Logistics Consultancy Ltd. On behalf of the owners of both sites, we

	request that Site B02 be removed from Appendix 2: List of Safeguarded Waste Sites and that the above minor changes to the site details be made in the adopted Plan. We intend to remain as participants in this process to ensure the profiles are updated and that Site B02 is removed as a safeguarded waste site. We will inform WLWA accordingly when Collett Way has been completed and in operation.
Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Please share any other comments	
Legally compliant	1
Sound	2
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	We request that Site B02 be removed from Appendix 2: List of Safeguarded Waste Sites and that the above minor changes to the site details be made in the adopted Plan
Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	We request that Site B02 be removed from Appendix 2: List of Safeguarded Waste Sites and that the above minor changes to the site details be made in the adopted Plan
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	

Your full name	PETER GEORGE WHITNEY DINES
Are you responding as an individual or representing another person/organisation?	As an agent on behalf of another person or organisation
Name of your organisation (if relevant)	RPH Town Planning Limited
Please tell us about yourself or the person/entity on whose behalf you are responding (tick all which apply)	[redacted]
Type your answer	
Do you have any detailed comments on the Proposed Submission West London Waste Plan?	Yes
Page number(s)	page 57
Paragraph number(s)	8.17
Policy number or name	Policy WLWP 1: Safeguarding Waste Sites
Site number or name (see appendices to the Plan)	E19
Maps	
Tables	
Please provide your comments below. If you have comments on multiple elements of the Plan please make it very clear to which section each comment relates and state the policy, table or figure number, paragraph number or site reference.	The site should be removed from the list of safeguarded sites in this draft plan. The site has not been used for any form of waste management since 2005 other than part of the site was sub-let to Autofleet Salvage Limited from 2015 until a few months ago. I stress this was not the whole site, but only the middle third. In the letter from LB Ealing, on the last page table, Autofleet Salvage Ltd are listed as occupiers of the whole site E19. (Autofleet had a licence from 2015 to break cars). LB Ealing's information is incorrect for two reasons: 1. Autofleet only ever occupied a third of the site (Block 2) and that was between 2015 and mid 2026. They have never occupied any other part of the site. 2. They have been gone from the site for the last three months. No waste management operation has ever been carried out in either Block 1 or Block 2. The intention of the owner is to either re-let the vacant Block 2 or occupy for his own purposes. The rating authority has been informed of Autofleet's departure.

Do you have any additional comments on the Integrated Impact Assessment Report?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Do you have any additional comments on the Habitat Regulations Assessment?	No
Page number(s)	
Paragraph number(s)	
Please provide your comments below. If you have comments on multiple pages or paragraphs please make it very clear to which each comment relates. You should ensure that your comments address whether the waste plan is sound and has been developed in line with legal requirements.	
Please share any other comments	The site should be removed from the list of safeguarded sites.
Legally compliant	2
Sound	2
Please give details of why you consider the Waste Plan is not legally compliant or is unsound, using the box below to set out your comments.	The site is incorrectly identified in the Plan, and its contents is therefore note soundly based
Please set out the modification(s) you consider necessary to make the Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified above.	The Plan should be modified to exclude site E19 as it is not sound nor resonably justified as an approprite site to be included for waste management purposes.
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	

END

Date: 09 October 2026
Our ref: 555484

[redacted]

T [redacted]

West London Waste Plan Team

BY EMAIL ONLY

Dear WLWP,

Planning consultation: Proposed Submission version of the West London Waste Plan (WLWP) – Regulation 19
Location: Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames, together with the Old Oak and Park Royal Development Corporation (OPDC)

Thank you for your consultation on the above dated 03 August 2026 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

West London Waste Plan

Natural England welcomes the opportunity to comment on the Proposed Submission West London Waste Plan and its accompanying Habitats Regulations Assessment (HRA).

Natural England has considered the Plan in relation to the legal and procedural requirements relevant to plan preparation, including the accompanying HRA, and the tests of soundness set out in national planning policy.

We are broadly supportive of the Plan and do not raise any fundamental concerns regarding legal compliance or soundness. The comments below are provided as recommendations that may strengthen the effectiveness of the Plan and provide additional certainty regarding the protection and recovery of the natural environment.

Habitats Regulations Assessment

Natural England welcomes the preparation of the HRA and the assessment of potential impact pathways affecting Habitats Sites within and beyond the Plan area.

We note that the HRA identifies and assesses a range of potential impact pathways including habitat loss, disturbance, air quality effects, traffic emissions, industrial emissions, water quality impacts and hydrological effects before concluding that adverse effects on site integrity can be ruled out through the application of plan policies, project-level assessment and other regulatory controls.

Natural England is broadly satisfied that the HRA has identified and assessed the main impact pathways affecting Habitats Sites. However, we consider that additional policy safeguards relating to designated sites and supporting habitat may assist in providing greater certainty that the Plan can be delivered without adverse effects on site integrity. This would help demonstrate that the Plan is

justified and effective.

Functionally Linked Habitat

Natural England welcomes the recognition within the HRA that qualifying species associated with internationally designated sites may utilise habitat outside designated site boundaries.

To ensure the Plan is effective and consistent with current Habitats Regulations requirements, Natural England recommends that supporting habitat and functionally linked habitat associated with Habitats Sites should be explicitly recognised within the Plan's policy framework where relevant.

This would provide greater clarity for applicants and decision-makers when considering proposals that may affect habitats which support the qualifying features of designated sites.

Designated Sites

Natural England welcomes the Plan's recognition of biodiversity and environmental protection. However, Natural England considers that explicit reference to internationally and nationally designated sites, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites, Sites of Special Scientific Interest (SSSIs) and irreplaceable habitats, would improve clarity and assist in demonstrating consistency with national policy.

Natural England therefore recommends that the Plan's biodiversity policies are reviewed to ensure that these designated sites and habitats are clearly recognised where appropriate.

Nature Recovery

Natural England's strategic priorities place increasing emphasis on nature recovery, environmental enhancement and the creation of resilient ecological networks.

The Plan already contains provisions relating to biodiversity protection and enhancement. Natural England recommends considering whether stronger references to London’s Local Nature Recovery Strategy and wider nature recovery objectives could further support the Plan's effectiveness and alignment with emerging strategic environmental priorities.

This may assist in ensuring that opportunities for habitat enhancement, ecological connectivity and biodiversity recovery associated with waste development are fully realised where appropriate.

Restoration and Recovery Schemes

Natural England welcomes the Plan's recognition of environmental restoration and enhancement opportunities associated with land recovery and restoration proposals.

Natural England considers that greater recognition of opportunities for habitat creation, ecological connectivity and biodiversity enhancement through restoration proposals could assist in ensuring the Plan delivers long-term environmental benefits and supports effective implementation of environmental objectives.

The supporting text could encourage restoration proposals, where appropriate, to contribute towards wider nature recovery objectives and biodiversity enhancement.

Air Quality

Natural England notes the consideration of air quality impact pathways within the Habitats Regulations Assessment.

Matters relating to air quality are generally addressed through existing regulatory processes and relevant environmental assessment requirements. We therefore have no specific comments on air

quality impacts at this strategic plan stage.

Water Environment

Natural England welcomes the HRA's consideration of water quality and hydrological impact pathways.

Given the importance of water quality and hydrological function to designated sites within the wider area, Natural England recommends that policies relating to wastewater and waste infrastructure clearly recognise the need to avoid adverse effects on designated sites and their supporting ecological processes.

This would assist in ensuring that the Plan remains effective and consistent with environmental legislation and national policy requirements.

Conclusion

Natural England is broadly supportive of the Proposed Submission West London Waste Plan and would not raise any fundamental concerns regarding its legal compliance or soundness.

The recommendations set out above are intended to strengthen the effectiveness of the Plan and provide additional certainty regarding the protection of designated sites, supporting habitat and opportunities for nature recovery.

If you have any queries relating to the advice in this letter please contact me on [redacted]

Yours sincerely,

Piotr Behnke
[redacted]
[redacted]