# Submission Plan (Regulation 22)

# Consultation Statement

**Draft: 1.1**

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# Abbreviations

| | |
|---|---|
| C, D & E | Construction, demolition and excavation (waste) |
| CDEW | Construction, demolition and excavation waste |
| EA | Environment Agency |
| FAQs | Frequently Asked Questions |
| GLA | Greater London Authority |
| HIC | Household, industrial and commercial (waste) |
| HRA | Habitats Regulations Assessment |
| IIA | Integrated Impact Assessment |
| LP2021 | London Plan 2021 |
| LPA | Local Planning Authority |
| MMO | Marine Management Organisation |
| NPPF | National Planning Policy Framework |
| OPDC | Old Oak and Park Royal Development Corporation |
| Rep No. | Representation reference number |
| SCI | Statement of Community Involvement |
| tpa | tonnes per annum |
| WDI | Waste Data Interrogator |
| WLLPAs | West London Local Planning Authorities |
| WLWA | West London Waste Authority |
| WLWP | West London Waste Plan |
| WPA | Waste Planning Authority |

# 1 Introduction

## Purpose

1.1 This Consultation Statement has been prepared to support the submission of the new West London Waste Plan (WLWP) 2026–2041, in accordance with Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. It sets out how the West London local planning authorities (WLLPAs), comprising the London boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond upon Thames, and the Old Oak & Park Royal Development Corporation (OPDC) have involved the community, residents, and stakeholders in preparing the WLWP. It demonstrates that this engagement meets the requirements of the relevant legislation, including the need to comply with respective LPAs' Statement of Community Involvement which was also considered as part of the agreed West London Waste Plan Consultation Protocol.

## Background

1.2 The WLWP is a joint Development Plan Document setting the planning strategy and policies for sustainable waste management across the seven local planning authority areas up to 2041. It is a statutory requirement to maintain an up-to-date waste plan and once adopted the new WLWP will replace the previous West London Waste Plan (adopted in 2015) which covered the period up to 2031. This will ensure the LPAs continue to have an up-to-date policy framework for meeting their waste planning obligations in line with national policy and the London Plan.

1.3 Public consultation on the emerging WLWP has been carried out in two main stages. The Regulation 18 Draft Plan was subject to public consultation from 11th December 2025 to 5th February 2026. Comments received during this first stage were carefully considered and taken into consideration when preparing the Regulation 19 Proposed Submission WLWP. The Regulation 19 Proposed Submission Plan was then published for representations on the Plan's soundness and legal compliance over eight weeks between 4th August and 28th September 2026.

1.4 Regulation 22(1)(c) requires a statement setting out which bodies and persons were invited to make representations under Regulation 18, how they were invited, a summary of the main issues raised by those representations and how they have been taken into account. Where representations were made pursuant to Regulation 20 (following publication of the Proposed Submission WLWP under Regulation 19), the statement must also set out the number of representations made and a summary of the main issues raised. Sections 3 and 4 of this Statement address the Regulation 18 consultation, and Sections 5 and 6 address the Regulation 19 publication stage.

## Structure of this Document

1.5 This Consultation Statement has been prepared to accompany the submission of the WLWP to the Secretary of State in accordance with Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). It provides an overview of the consultation activities at each stage of plan preparation, including which bodies and persons were invited to make representations under Regulation 18 and Regulation 19, how they were invited, a summary of the main issues raised, and how those issues have been addressed in the plan submitted.

1.6 This Consultation Statement comprises six sections as follows:

- Section 1: Introduction
- Section 2: The timeline which has been followed in preparing the West London Waste Plan which is in accordance with the LPAs' Local Development Schemes
- Section 3: Summary of the Regulation 18 consultation process
- Section 4: Summary of the main issues raised during the consultation carried out under Regulation 18 and how each of the comments received have been considered by the WLLPAs and taken account of in the drafting of the Regulation 19 Proposed Submission WLWP. Section 4 is supported by Appendix 2 which provides more detail concerning the comments received and WLLPAs' responses
- Section 5: Summary of the Regulation 19 consultation process, during which the Proposed Submission WLWP was published for representations
- Section 6: The number of representations made under Regulation 20 and a summary of the main issues raised, together with a summary of the WLLPAs' response to each main issue. Section 6 is supported by Appendix 4, which sets out a schedule of the representations received, in Plan order, and the WLLPAs' response to each. A separate Appendix includes the representations in full (with redactions where necessary)

# 2 Plan Production Timeline

2.1 The creation of a new West London Waste Plan has followed a number of key stages, from initial evidence gathering through public consultations to submission. Engagement with the local community, businesses and organisations has helped develop a Plan tailored to meeting the waste needs of the Plan area in terms of strategy and the policies required to deliver it.

2.2 Figure 1 below outlines the main stages of preparing the WLWP, including publication of the Proposed Submission WLWP for representations in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

### Key Plan Production Stages

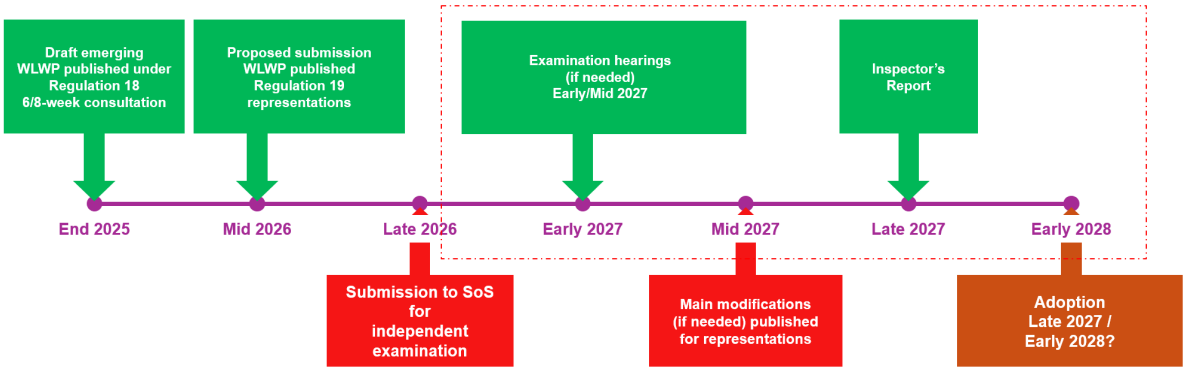



**Figure 1: Plan Making Process Timeline**

Stage 1: Identify issues and collect evidence

2.3 In Autumn 2024, the WLLPAs agreed to jointly update the adopted West London Waste Plan (2015). Preparation of the initial draft WLWP that went to public consultation under Regulation 18 involved the following steps:

- Review of policies in the adopted West London Waste Plan and the adopted and emerging LPA Local Plans;
- Review of national and regional policy, in particular:
  - National Planning Policy Framework (2024)
  - National Planning Policy for Waste (2014)
  - The London Plan (2021)
- Undertaking a Waste Needs and Capacity Assessment to establish the extent to which existing waste management capacity would be able to meet

requirements for waste management over the Plan period, including the London Plan apportionments for Household, Industrial & Commercial waste.

2.4 From the above, the WLLPAs identified the issues that needed to be addressed by the new WLWP and approaches to addressing them.

2.5 A draft Vision and Strategic Objectives were prepared setting out how the WLLPAs envisage land being used for waste in west London to 2041. Planning policies to be used when determining proposals for planning permission were drafted to promote the pattern of use desired. Text was also drafted for inclusion in the Plan to set out the vision and objectives, explain what each of the policies is intended to achieve, and how each is to be used.

2.6 The draft WLWP was also subject to Integrated Impact Assessment and a Habitats Regulations Assessment which also informed how the policies developed. An Integrated Impact Assessment Scoping Report was prepared and issued on 25th June 2025 to the following bodies for a five-week statutory consultation on its contents, including the Sustainability Objectives:

- Environment Agency
- Natural England
- Historic England

2.7 Responses were received from Historic England on 28th July 2025, the Environment Agency on 29th July 2025 and Natural England on 1st August 2025.

Stage 2: Reg 18 Draft West London Waste Plan consultation – 11th December 2025 – 5th February 2026

2.8 Following initial meetings with key stakeholders (GLA and WLWA) to discuss the content and scope of the Plan, the WLLPAs consulted on a draft version of the WLWP under Regulation 18 for an eight-week period between Thursday 11th December and Thursday 5th February 2026 (taking account of the consultation period extending over the festive period). Evidence base and other supporting documents, including the Integrated Impact Assessment, were published alongside the Draft WLWP. The key documents published are listed below:

- Draft West London Waste Plan for consultation
- Integrated Impact Assessment for Reg 18 WLWP
- Habitats Regulations Assessment for Reg 18 WLWP
- Strategic Flood Risk Assessment for Reg 18 WLWP
- Integrated Impact Assessment Scoping Report
- Climate Change Topic Paper
- Circular Economy Topic Paper
- Waste Management Topic Paper

- Strategically-significant Waste Flows Report
- Assessment of Existing Capacity
- Assessment of Safeguarded Sites for Release
- Construction, Demolition and Excavation Waste arising to 2041
- Hazardous Waste Arising to 2041
- WLWP Consultation Protocol
- Call for Sites Form

2.9 This evidence base provided the justification for the draft policies. The public and other stakeholders were invited to comment on any aspect of the Draft WLWP during this period. (The consultation methods for this stage are detailed in Section 3 below).

Stage 3: Plan amendments and evidence base update – February 2026 - May 2026

2.10 The WLLPAs considered comments and representations received during the Draft WLWP Regulation 18 consultation. The evidence base and other documents, including the Integrated Impact Assessment and Capacity Assessment were updated as necessary to reflect feedback received. In addition, the small number of sites nominated in response to the Call-for-Sites were assessed in the context of there being a surplus of capacity for managing the key waste streams in the Plan area therefore there was no strategic need to allocate additional sites through the Plan. The draft Plan was updated to take account of comments and ensure that it is both sound and legally compliant. The draft Proposed Submission WLWP was considered by each WLLPA (via Committee, Cabinet and/or full Council/Board as dictated by each LPA's Constitution) during the period May to July 2026 prior to publication under Regulation 19.

Stage 4: Publish the Plan (Submission Plan Reg 19) – 4th August 2026 – 28th September 2026

2.11 In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), a Proposed Submission version of the WLWP was made available for representations on its soundness and legal compliance for an eight-week period between Tuesday 4th August and Monday 28th September 2026. In accordance with the Local Plan Regulations, this consultation is statutory, seeking comments specifically on the Plan's soundness and legal compliance for examination.

Stage 5: Submission to the Secretary of State: December 2026

2.12 This Consultation Statement sets out the main issues identified from the representations received during the Regulation 19 consultation. The WLLPAs intend to submit a version of the WLWP they consider to be sound for examination by an independent inspector appointed by the Secretary of State.

Stage 6: Examination: Early-mid 2027

2.13 Following submission to the Secretary of State, the Plan is to be examined by an independent Planning Inspector.

Stage 7: Adoption - Late 2027/Early 2028

2.14 Subject to the Plan being found sound and legally compliant by the Inspector, the Plan will be considered for adoption by each of the WLLPAs during 2027/2028.

# 3 Summary of Regulation 18 Consultation Process

3.1 A draft Plan was published for consultation under Regulation 18 for a period of eight weeks between 11th December 2025 and 5th February 2026. Organisations and persons were invited to make representation on the Plan, the evidence base and other supporting documents which were made available for viewing online and printed copies were placed at locations in each constituent local planning authority area.

3.2 A wide range of organisations and individuals were sent notifications about the consultation and invited to make comments during the consultation period. These included the following:

- all 31 London Borough Councils, Westminster City Council and the City of London Council.
- 24 Waste Planning Authorities outside of London where strategic flows of waste from west London were identified
- the operators/owners of existing waste sites in west London as representatives of the waste management industry
- representatives from statutory and non-statutory consultees and other bodies prescribed under the Duty to Cooperate including:
  - Affinity Water
  - Cadent Gas
  - Canal & River Trust
  - Civil Aviation Authority
  - Environment Agency
  - Greater London Authority
  - NHS
  - Historic England
  - Homes England
  - Marine Management Organisation
  - Mining Remediation Authority
  - National Highways
  - National Rail
  - Natural England
  - Network Rail
  - Office of Rail & Road
  - Sport England
  - Thames Water Utilities
  - Theatres Trust
  - Transport for London
  - UK Power Networks
- organisations and individuals on each of the WLLPAs' planning contact databases.

## How bodies and persons were invited to make representations

3.3 The Regulation 18 consultation was carried out in accordance with the strategy set out in the Consultation Protocol, using a range of engagement methods to raise awareness of the consultation and encourage engagement of different groups in the Plan production process.

3.4 All contacts on each of the WLLPAs' planning consultee databases, including statutory consultees, interested stakeholders and waste related organisations were notified of the consultation directly via email. All emails included details of the consultation, how to make comments and attend events (drop-ins and online event).

3.5 Public notices about the consultation were published in the local press and information was also published on the WLLPAs' social media channels in accordance with relevant Statements of Community Involvement.

3.6 The Regulation 18 public consultation on the WLWP was facilitated using a consultation website hosted by the London Borough of Ealing (https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation). All consultation documents were available to view and download on the website throughout the consultation period. Printed copies of the draft WLWP were made available for public access at each of the LPA main offices and selected local locations in each LPA area.

3.7 The WLLPA websites included information on the consultation including where to access the online and printed copies of the document in the LPA area and links to the consultation website hosted by Ealing.

3.8 Two online consultation sessions were held (using Microsoft Teams) which took place at 12.30pm on 16th December 2025 and 5.00pm on 21st January 2026. An event recording was made available for viewing via the consultation website.

3.9 Further information about the WLWP and the consultation was set out in 'Frequently Asked Questions' published on the consultation website. A feedback form was provided specifically for use in submitting comments and queries either by email or post.

3.10 Drop-in sessions were held in each WLLPA area during the consultation period as detailed below. These sessions were attended by officers engaged in the preparation of the WLWP and allowed anyone to request further information about the WLWP in-person.

3.11 All of the above methods – emails, public notices, online consultation portal, making printed documents available at selected locations, online events, FAQs, feedback forms, and local drop-ins – were used to ensure a broad and effective engagement at the Regulation 18 stage, in line with the Consultation Protocol commitments, meeting the regulatory requirements for making the plan available for inspection and were consistent with each of the LPA's Statements of Community Involvement (SCI).

| Location | Date | Time |
|---|---|---|
| Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ | 08/01/2026 | 1400-1800 |
| Ealing Council Offices, Perceval House, 14-16 Uxbridge Road, W5 2HL | 27/01/2026 | 1500-1800 |
| Wealdstone Library 38-40 High St, Harrow HA3 7AE | 15/01/2026 | 1400-1800 |
| Uxbridge Library, Civic Centre, High Street, Uxbridge, UB8 1UW | 13/01/2026 | 1200-1700 |
| Hounslow House, 7 Bath Road, Hounslow, TW3 3EB | 19/01/2026 | 1400-1800 |
| Oaklands Social, Oaklands Rise, 19 Green St, London NW10 6FT (OPDC) | 20/01/2026 | 1500-1900 |
| Civic Centre, 44 York Street, Twickenham, TW1 3BZ | 20/01/2026 | 1200-1600 |

## Other engagement activity

3.12 In addition to the public consultation efforts described above, the LPAs undertook further engagement as part of the plan preparation process. Representatives of the WLLPAs attended the London Waste Planning Forum (the regional forum attended by planning officers of the London WPAs, and representatives of the industry, the GLA and adjoining regions) and informed its members of the upcoming consultation and to remind them when the consultation was taking place. Meetings were held in January and April 2026.

3.13 To date, five meetings with the Greater London Authority (GLA), the body responsible for coordination of waste planning across London, primarily concerning general conformity with the London Plan, have taken place. Meetings covered the assessment of capacity, definition of existing waste sites, the proposed approach to release of sites from safeguarding, and the prospect of change presented by the imminent review of the London Plan.

3.14 The LPAs also held focused discussions with certain key stakeholders who have particular interests in waste planning including meetings with representatives of Tower Hamlets Council and Westminster City Council to understand their requests to share capacity to meet unmet needs. These were followed up with correspondence.

# 4 Outcome of Regulation 18 Consultation - Summary of Main Issues Raised

4.1 77 responses were received in total with the following breakdown of respondents:

| Type of respondent/consultee | Number |
|---|---|
| London Boroughs | 4 |
| Mayoral Development Corporations | 1 |
| Joint waste disposal authorities in London | 1 |
| Waste Planning Authorities outside London | 2 |
| Local Planning Authorities outside of London | 2 |
| Occupiers/owners of existing sites | 9 |
| Government Agencies | 6 |
| Infrastructure Operators and Utilities | 4 |
| Non-Governmental Organisations | 3 |
| Individuals | 41 |
| Residents' Associations or local networks | 4 |

4.2 A table which summarised each of the issues raised in response to the consultation, and how these issues have been addressed, as appropriate, in preparing the Regulation 19 Proposed Submission WLWP is included as Appendix 2 of this document.

4.3 A summary of the main issues raised is included below:

4.4 **Method used to assess site capacity**: Some agreement and disagreement regarding deviating from use of the 5-year peak throughput (referred to in London Plan para 9.9.2) and requests to increase or decrease assessed capacity based on Environment Agency Permit, planning permission or actual/realistic throughput, questioning of methodology/data sources used and definition of existing waste sites;

4.5 **Proposed release of select sites without direct compensatory capacity provision**;

4.6 **Sharing of surplus capacity** including requests to provide for unmet needs and the need for formal mechanism to provide for sharing of surplus capacity including through Statements of Common Ground;

4.7 Requests for **removal of specific sites from safeguarding,** on the basis of lack of waste management activity taking place at the site and unauthorised use taking place;

4.8 Requests for **safeguarding to be expanded** to include amended site boundaries (reflecting planning permission or ownership) and the addition of particular existing sites;

4.9 Request for an **additional policy concerning wastewater treatment** capacity (Thames Water Utilities Ltd);

4.10 Need for **cross-boundary engagement** on waste and movements and capacity, especially landfill;

4.11 Add more **emphasis on sustainable transport** modes and routes (raised by non-governmental organisations and agencies);

4.12 Evidence base/need assessment to consider **implications of major infrastructure projects** on waste arisings, potential for re-use (C, D & E waste) and effects on existing waste sites to be safeguarded plus facilities outside the WLWP area, such as the Colnbrook Energy from Waste facility;

4.13 Add reference/more detail to **issues to be considered in determining applications** including biodiversity, heritage and archaeology, birdstrike, infrastructure assets (raised by government agencies and non-governmental organisations);

4.14 Issues of **detail** regarding site ownership, boundaries, throughput and waste types (raised by owners/operators);

4.15 **Requests to discuss specific issues**, including proposals for re-location and removal of safeguarding, offered by a number of representors.

4.16 Of the 77 responses received, 45 were from individuals, residents or representatives of local organisations including residents' associations and local networks. A range of views are expressed in terms of the agreement or disagreement with the Vision, Objectives and policies.

4.17 Specific comments and issues raised include:

- Format and style – too long and difficult to understand especially the local implications;
- Fails to address need for more and accessible household recycling centres given increasing demand from new housing;
- Numerous objections to Arlington Works (Site R04) being safeguarded due to inappropriate location and impacts on amenity in a residential area, and the site no longer being in use.

## Call for Sites

4.18 While the evidence base demonstrates there is sufficient waste management capacity to meet identified needs to 2041, and so no need for additional sites to be allocated in the WLWP has been identified, the consultation also included an invitation, through a separate Call for Sites form, for additional sites to be put forward for consideration.

4.19 The sites proposed were:

- Broadwater Lake in Hillingdon proposed by Tarmac: Proposal for inert fill (non-hazardous C, D & E waste) in restored quarry
- High View Farm in Hillingdon proposed by Envar Composting Ltd: 3 plots around the existing waste site for expansion of consented composting area, and possible relocation of Waste Transfer Station.
- McGovern House Wet Waste in Hounslow proposed by Wet Waste Company: Operational site ancillary to plant hire business, seeking 'reference and protection' (safeguarding) for operation undertaking screening/washing of road sweeping sludges to recover materials that benefits from an environmental permit.

4.20 The merits of each of the three proposed sites, and their proposed waste use, were considered including assessment against criteria. The assessments and a summary are included in Appendix 3.

4.21 Overall, having assessed the cases for each of the three sites set out in each of the nominations, no justification was found for the inclusion of additional allocated sites (for additional waste development) in the Regulation 19 version of the WLWP.

# 5 Summary of Regulation 19 Consultation Process

5.1 After carefully considering the feedback received from the consultation Draft WLWP stage, the Proposed Submission WLWP was published for representations under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) for a period of eight weeks between Tuesday 4th August 2026 and Monday 28th September 2026. Representations were invited on whether the Plan has been prepared in accordance with legal and procedural requirements, and whether it is sound.

5.2 The Plan, the evidence base and other supporting documents were made available for viewing on the consultation website hosted by the London Borough of Ealing (https://haveyoursay.ealing.gov.uk/en-GB/projects/wlwp-consultation), and printed copies of documents were made available for inspection at the main local planning authority offices and other locations in each constituent local planning authority area. The Plan related documents that were published include:

- Proposed Submission West London Waste Plan
- Statement of Representations Procedure and Statement of Fact
- Integrated Impact Assessment and Non-Technical Summary
- Habitats Regulations Assessment
- Strategic Flood Risk Assessment
- Waste Capacity Assessment and Arisings Estimates
- Strategic Waste Flows Report
- Existing Safeguarded Sites for Release – Assessment Report
- Climate Change Topic Paper
- Circular Economy Topic Paper
- Waste Management in West London Topic Paper
- Regulation 18 Consultation Statement
- Consultation Protocol
- Response Form

## Bodies and persons invited to make representations under Regulation 19

5.3 In accordance with Regulation 19(b), a statement of the representations procedure and a statement of the fact that the proposed submission documents were available for inspection, and of the places and times at which they could be inspected, was sent to each of the consultation bodies invited to make representations under Regulation 18(1) (see Section 3).

5.4 All contacts on each of the WLLPAs' planning consultee databases and those who made representations at the Regulation 18 stage, were notified of the consultation directly by email or letter, including all specific and general

consultation bodies, neighbouring authorities, landowners, stakeholders, and every individual who had responded or expressed interest previously. Those who had made comments during the Regulation 18 consultation or had asked to be kept informed were specifically included in the notification mailing, to ensure continuity of engagement. The notification correspondence emphasised that this was the final opportunity to comment before the Plan's submission, and provided guidance on submitting representations focused on legal compliance and the tests of soundness.

## How representations could be made

5.5 Representations could be made online through the consultation website via an online questionnaire or by email to WLWastePlan@ealing.gov.uk or by post. Anonymous comments, and comments marked as private or confidential, could not be accepted.

5.6 The response form followed the structure of the Planning Inspectorate's model representation form. It asked respondents which part of the Plan their representation relates to; whether they consider the Plan legally compliant and sound; the reasons for their representation; the modification(s) they consider necessary; and whether they wish to participate in the examination hearing sessions.

5.7 Respondents were advised that anyone wishing to take part in the examination must submit comments during the Regulation 19 consultation, even if they had responded at the Regulation 18 stage.

5.8 To aid in making the consultation accessible, an explanatory video was provided on the website which included a summary of how the plan had evolved and a reminder of the tests of soundness that representations should focus on. An updated 'Guidance Notes and Frequently Asked Questions' document was published on the consultation website as well to help potential respondents. Officers from the LPAs' planning policy teams were available to answer queries about the process during the consultation period.

5.9 Pursuant to Regulation 22, all representations made under Regulation 20 (i.e. during the Regulation 19 stage) have been compiled in this Consultation Statement for submission alongside the Submission Draft WLWP. Full copies of the original representations will be made available for the Inspector and public to view online.

# 6 Outcome of Regulation 19 Consultation - Summary of Main Issues Raised

6.1 In accordance with Regulation 22(1)(c)(v), this section sets out the number of representations made pursuant to Regulation 20 and a summary of the main issues raised in those representations.

6.2 158 representations were made by 62 respondents. A late representation was also received from 1 respondent (Natural England). Representations received through the consultation website and those received by email have been combined into a single schedule, and each representation has been given a unique reference number (Rep No.). The breakdown of respondents (the late representation is reflected in the bracketed numbers) is as follows:

| Type of respondent/consultee | Number |
|---|---|
| London Boroughs | 4 |
| Mayor of London (Greater London Authority) | 1 |
| Mayoral Development Corporations | 1 |
| Waste Planning Authorities outside of London | 5 |
| Local Planning Authorities outside of London | 2 |
| Occupiers/owners of existing sites | 11 |
| Other businesses and landowners | 2 |
| Government Agencies | 4(5) |
| Infrastructure Operators and Utilities | 5 |
| Non-Governmental Organisations | 5 |
| Individuals | 20 |
| Residents' Associations or local networks | 2 |
| **Total** | **62 (63)** |

6.3 Of the 62 respondents and 1 late respondent, 31 stated that the Plan is legally compliant and 10 considered it is not; 24 stated that the Plan is sound and 24 considered it is not. 15 respondents did not state a view on either question. These figures, which do not necessarily add up to totals, include views stated in correspondence as well as on the response form.

6.4 All the duly made representations have been analysed, and the summary of the main issues raised by each representation is presented in Appendix 4 of this Statement, alongside the WLLPAs' responses to each issue. The late representation is presented in Appendix 5. As the Regulation 19 process is focussed on the Plan's soundness and legal compliance, the issues raised tend to be more targeted suggestions or objections regarding specific policies, sites, or evidence, rather than broad observations.

6.5 The main issues raised are summarised below in Plan order. The principal respondents raising each issue are named so that the corresponding representations can be found in the schedule at Appendix 4. The WLLPAs' response to each representation is set out alongside it in Appendix 4.

6.6 **General conformity and legal compliance:** the GLA considers that the Plan is not in general conformity with the London Plan, because sites are proposed for release without compensatory capacity and surplus capacity has not first been offered to boroughs with a shortfall; British Land also challenges the Plan's legal compliance;

6.7 **Consultation process:** the documents are considered too long and technical, with requests for shorter summaries and plainer language (Harrow Monitoring Group and several residents);

6.8 **Heathrow expansion:** greater recognition of proposed expansion plans and its effect on safeguarded sites, including release of sites HI06 and HI09 (see paragraph below on release of sites), and a related monitoring and review trigger (Heathrow Airport Limited, Heathrow West, Spelthorne BC);

6.9 **Sharing of surplus capacity:** LB Tower Hamlets and Westminster City Council seek to share west London's surplus capacity to meet their unmet needs, including a reference in Policy WLWP 1, and LB Lambeth seeks clarity on how sharing arrangements would be secured and monitored;

6.10 **Evidence base:** questions on the capacity assessment data, the surplus figures, the threshold for strategically significant waste flows and hazardous waste arisings, and reliance on facilities outside west London, including Sutton Courtenay landfill which is expected to close in 2030 (Environment Agency, British Land, FM Conway, Oxfordshire CC, Spelthorne BC);

6.11 **Policy WLWP 1:** the definition of existing waste sites (GLA, LB Tower Hamlets, Environment Agency), the approach to compensatory capacity in Part F (GLA), and the safeguarding of railheads and wharves in Part H (Network Rail, Day Group, Environment Agency);

**Release of sites:** Removal from safeguarding is sought for the following sites:

- B02 (100 Twyford Abbey Rd) by Rapleys LLP (on behalf of the site owners) request removal of site from on the basis that planning permission for the compensatory waste facility at Site E20 has been implemented and is under construction.
- B12 (Unit 2, Hannah Close) by DP9 (on behalf of the landowner) principally on the basis that the surplus waste capacity identified justifies releasing further sites.
- B16 (off Great Central Way, Neasden) by Waste Planning and Permitting Limited (on behalf of the landowner) principally on the basis that the surplus waste capacity identified justifies releasing further sites.
- E19 (Unit 42a Sheraton Business Park) by RPH Town Planning Limited (on behalf of the landowner) on the basis that while one part of the site was sub-

let and used for waste management, the occupiers of this part of the site left three months ago.

- HI06 (Land off Holloway Lane Harmondsworth) by Heathrow Airport Limited on the basis that there is sufficient residual capacity from other existing sites and the inclusion of the site is not justified or effective as there is a greater need for the Heathrow expansion Critical National Growth Infrastructure (CNGI).
- HI09 (Holloway Lane Materials Recycling Facility) by Heathrow Airport Limited on the basis that there is sufficient residual capacity from other existing sites and the inclusion of the site is not justified or effective as there is a greater need for the Heathrow expansion Critical National Growth Infrastructure (CNGI).
- R02 (The Royal Botanic Gardens, Kew) by London Parks and Gardens on the basis failed to consider the heritage and landscape designations, the London Parks and Gardens consider the site should be removed or the context acknowledged; and
- R04 (Arlington Works) by PMV Planning (on behalf of the landowner/operator) due to waste operations under the CLEUD ceasing on site, the Environment permit being surrendered, and the site not falling within the waste site definition set out by the London Plan.

6.12 **Site details:** corrections sought to site boundaries, assessed capacities and operator details (including B16, HI18, HI24 and HO2);

6.13 **Historic and natural environment:** stronger protection for heritage assets, registered parks and gardens, archaeology and green infrastructure (London Parks & Gardens, Historic England, National Trust, Colne Valley Regional Park Trust);

6.14 **Amenity and transport:** HGV movements, cumulative impacts, pests, noise and dust near existing waste sites (Harrow Monitoring Group, Transport for London and residents);

6.15 **Climate change and energy from waste:** the role of energy from waste, carbon budgets and landfill (Hounslow Green Party and residents);

6.16 **Policies WLWP 5 to WLWP 7:** beneficial use of excavated material (Canal & River Trust), circular economy measures, and opposition to wastewater discharges;

6.17 **Monitoring Framework:** additional indicators sought, including on community and environmental outcomes, heritage, strategic flows and pest complaints;

6.18 **Integrated Impact Assessment:** how the historic environment has been accounted for, reasonable alternatives and land promoted through the Call for Sites;

6.19 **Matters outside the scope of the WLWP**, such as drainage, recycling services, plastics and fly-tipping; and

6.20 General support, no objection or no comments from a number of authorities and bodies, including Essex CC, National Highways, the Port of London Authority, Rotherham MBC, Suffolk CC and Waverley BC.

6.21 In conclusion, the WLLPAs are satisfied that all representations received have been properly considered and where appropriate, those representations made at Regulation 18 stage led to amendments to improve the WLWP. The WLLPAs consider that no issues were raised that fundamentally undermine the soundness of the plan's strategy or compliance with legal requirements.

6.22 The WLLPAs have reviewed the duly made representations made at Regulation 19 stage and are of the view that the Plan is sound. Any modifications sought by the Inspector during the course of the Examination process will be subject to public consultation and where necessary, IIA.

6.23 In providing initial responses to the Regulation 19 comments (as set out in Appendix 4 of the Statement of Consultation) and the preliminary work on drafting Statements of Common Ground, in a number of areas initial additional modifications are referenced which could merit consideration during the course of the Examination. These include:

- A modification could be considered to correct an omission from the contents list of the Plan.
- Modifications could clarify the approach to safeguarded railheads and wharves in WLWP 1 (H).
- A modification to Policy WLWP 4 could be considered to add a general reference to the natural and historic environment. Modifications could reference procedural requirements where work is proposed to a safeguarded site in the vicinity of London Underground assets / rail infrastructure, and safe waste transport, in the supporting text to Policy WLWP4.
- In relation to sites, modifications could be considered to clarify: for Site H02 the capacity value for CDE waste; for Site HI18 an amendment to the site boundary; for Site B02 an amendment based on updates related to the progress being made to deliver compensatory site provision (E20).

## Strategic Cooperation

6.24 Engagement has taken place primarily with the GLA through a number of meetings. Engagement with the GLA is expected to continue, with the possibility of a Statement of Common Ground being agreed closer to Plan Examination

6.25 The WLLPAs have consulted London WPAs and continue to engage with those who have made requests to discuss sharing surplus capacity.

6.26 Engagement on strategic cross-boundary matters, including progress on Statements of Common Ground, is set out in the separate WLWP Strategic Cooperation Statement, which itemises actions and associated outcomes throughout the plan preparation process.

## Next Steps

6.27 This Regulation 22 Consultation Statement, together with its appendices, will be submitted alongside the Submission WLWP to support examination of the Plan. It demonstrates the extensive consultation and engagement undertaken and how the Plan has evolved in response to feedback received. By fulfilling the requirements of Regulation 22(1)(c), this Statement provides transparency in the plan-making process and will assist the Planning Inspector in understanding the consultation history of the plan.

6.28 The WLLPAs will continue to engage with stakeholders as needed up to and through the Plan's examination. Upon adoption of the WLWP, a final notification will be issued to all who requested to be notified of its adoption.

# Appendix 1: Statement of Representations Procedure

Official

**Statement of Representations Procedure and Statement of Fact**
**Regulation 19 Proposed Submission West London Waste Plan**
**August 2026**

**Regulation 19: Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)**

**1. Statement of Representation**

1.1 This statement has been prepared by the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond Upon Thames (the west London boroughs') and the Old Oak and Park Royal Development Corporation (OPDC) in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.

**2. Title of Document(s)**

- Regulation 19 Proposed Submission West London Waste Plan, 2026
- Integrated Impact Assessment, 2026 and Integrated Impact Assessment Non-Technical Summary, 2026
- Habitats Regulations Assessment, 2026

**3. Subject Matter and Area Covered by the Plan**

3.1 The Regulation 19 Proposed Submission West London Waste Plan (WLWP) sets out how waste should be managed in west London until 2041.

3.2 It provides a vision, strategic objectives and seven policies to guide planning decisions related to the management of waste across west London. The Plan safeguards existing waste sites so that they can remain in waste use. This will help ensure that there is enough capacity to manage waste in west London. The Plan includes a definition for, and list identifying, safeguarded waste sites across west London.

3.3 The Plan also justifies the release of six waste sites from safeguarding, including three in Brent, one in Hounslow and two in OPDC. These sites are identified for release from safeguarding on the basis that the Plan area still has sufficient capacity to meet identified waste needs, and their continued safeguarding and use for waste would conflict with wider planning and regeneration objectives for specific areas. No new waste management sites have been allocated in the Plan.

3.4 The WLWP contains seven policies that cover: safeguarding and optimising the waste site network; residual waste management and energy recovery; ensuring high quality and resilient waste facilities; deposit of waste on land; circular economy and resource efficiency; and the provision of wastewater treatment infrastructure.

3.5 The WLWP is a jointly prepared strategic document which covers the area within the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond Upon Thames and those parts of Brent and Ealing that are within the OPDC area. If adopted, it would form part of the development plan for each of the participating authorities alongside the London Plan and each authority's adopted Local Plans, Area Action Plans and Neighbourhood Plans.

3.6 The documents (listed in section 2, above) are being made available for public inspection to provide any individual, group or business the opportunity to make representations on the 'soundness' and legal compliance of the WLWP for the consideration of an independent Planning Inspector. This Statement of Representations Procedure will also be available for inspection.

**4. Period for submission of representations**

4.1 The period for submission of representations begins on Tuesday 4th August and ends on Monday 28th September 2026 (23:59pm). The consultation is running for eight weeks, rather than the statutory minimum six weeks. You can make a representation anytime within this eight week period provided we **receive it by 23:59pm on Monday 28th September 2026.**

**5. How and where to view the Regulation 19 Proposed Submission West London Waste Plan**

5.1 Copies of documents are available for inspection as follows:

- The Regulation 19 Proposed Submission West London Waste Plan and all of the supporting documents, including the Statement of Representations Procedure, are available to view on Ealing Council's online consultation portal: haveyoursay.ealing.gov.uk/projects/wlwp-consultation.
- Printed copies of the documents listed in section 2 above and Statement of Representation Procedure are also available at the west London boroughs' and OPDC's main offices and at the following selected venues in the WLWP plan area set out in Appendix 1 below.
- If you require the consultation documents in an alternative format, please contact the West London Waste Team at wlwasteplan@ealing.gov.uk

**6. What to consider when making a representation**

6.1 When making representations on the documents, the following questions should be considered:

- **Is the Plan legally compliant?** Does the WLWP comply with the relevant legislation and regulations in the way it has been prepared, and in its content?
- **Is the Plan 'sound'?** Has the WLWP been 'positively prepared'? Is it robustly justified and evidence-led? Will it be effective in what it sets out to achieve? Is it consistent with regional and national planning policy?

**7. How to make a representation**

7.1 Representations must be made in writing or by way of electronic communications via one of the following methods:

- Complete an online questionnaire on Ealing Council's online consultation portal: haveyoursay.ealing.gov.uk/projects/wlwp-consultation.
- Email your completed response form to wlwasteplan@ealing.gov.uk. A PDF and Word version of the form can be found at haveyoursay.ealing.gov.uk/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 (note: 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

**Note:** Please submit your representations once only (using only one of the methods listed above) to avoid duplicate representations.

Please visit haveyoursay.ealing.gov.uk/projects/wlwp-consultation for further details.

7.2 A name and postal address must be provided for the comments to be accepted, although only names of individuals or organisations will be in any published reports. Please note your submission is required to be made public alongside your name. Anonymous or confidential representations, without the required personal information, cannot be accepted. Published reports and responses are required to be submitted to the Secretary of State as part of the plan Examination process.

**8. Notification of the next steps**

8.1 Once the Regulation 19 consultation period has closed, updates regarding the submission of the WLWP will be published on the consultation webpages. You should notify us in your representation whether you would like to be notified of when the WLWP is submitted for Examination, when we publish the Inspector's report and/or when the WLWP is adopted.

8.2 An independent Planning Inspector will then be appointed by the Secretary of State for Housing, Communities and Local Government to undertake an independent examination into whether the WLWP is legally compliant and passes the tests of soundness. The examination will include hearing sessions held by the Planning Inspector in public at which those who have made a valid representation may, at the discretion of the Planning Inspector, have the right to participate. If you wish to participate, please make this clear in your representation.

**9. Contact the WLWP Team**

9.1 If you would like any further information on the Regulation 19 Proposed Submission West London Waste Plan, or any of the supporting documents, please contact us via:

- Email: wlwasteplan@ealing.gov.uk
- Post: Planning and Infrastructure, West London Alliance, Ealing Council, 5th Floor, Perceval House, 14-16 Uxbridge Road, Ealing, W5 2HL

**Appendix 1**

| Borough | Location | Opening times |
|---|---|---|
| **Brent** | Ealing Road Library, 43 Ealing Road, Wembley, HA0 4BA | Monday to Friday: 10:30am to 6pm<br>Saturday: 10:30am to 5pm<br>Sunday: 12pm to 5pm |
| | Harlesden Library, Craven Park Road, London, NW10 8SE | Monday to Friday: 10:30am to 6pm<br>Saturday: 10:30am to 5pm<br>Sunday: 12pm to 5pm |
| | Kilburn Library, 42 Salusbury Road, London, NW6 6NN | Monday to Friday: 10:30am to 6pm<br>Saturday: 10:30am to 5pm<br>Sunday: 12pm to 5pm |
| | Kingsbury Library, 522-524 Kingsbury Road, London, NW9 9HE | Monday to Friday: 10:30am to 6pm<br>Saturday: 10:30am to 5pm<br>Sunday: 12pm to 5pm |
| | Wembley Library, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ | Monday to Friday: 10:30am to 8pm<br>Saturday: 10:30am to 5pm<br>Sunday: 12pm to 5pm |
| | The Library at Willesden Green, 95 High Road, Willesden, NW10 2SF | Monday to Friday: 10:30am to 8pm<br>Saturday: 10:30am to 5pm<br>Sunday: 12pm to 5pm |
| | Kensal Rise Library, Bathurst Gardens, London NW10 5JA | Wednesday 2pm to 7pm<br>Thursday 2pm to 5pm<br>Friday 2pm to 5pm<br>Saturday 10am to 5pm |
| | Cricklewood Library, 152 Olive Road, London NW2 6UY | Monday 10am to 5pm<br>Wednesday 10am to 5pm<br>Thursday 9.30am to 1pm<br>Friday 3pm to 6pm<br>Saturday 9.30am to 2pm |
| | Barham Community Library, Unit 4, 660 Harrow Road, Wembley, London, HA0 2HB | Monday 3.00pm to 6.00pm<br>Wednesday 3.00pm to 6.00pm<br>Saturday 11.00am to 3.00pm |
| | Preston Community Library, Henry Cooper House, 160 Carlton Avenue East, Wembley, HA9 8PL | Monday 2.30pm to 5.30pm<br>Wednesday 2.30pm to 5.30pm<br>Friday 2.30pm to 5.30pm<br>Saturday 11am to 5pm |
| **Ealing** | Ealing Council, Perceval House, 14-16 Uxbridge Road, Ealing, W5 2HL | By appointment, please contact: Localplan@ealing.gov.uk |

| Borough | Location | Opening times |
|---|---|---|
| | Acton Town Hall Library, Everyone Active Acton Centre, High Street, Acton, London W3 6NE | Monday 10am to 5pm<br>Tuesday 10am to 7pm<br>Wednesday 10am to 7pm<br>Thursday 10am to 7pm<br>Friday 10am to 5pm<br>Saturday 10am to 5pm |
| | Ealing Central Library, Ealing Broadway Centre, Ealing, London W5 5JY | Monday 10am to 5pm<br>Tuesday 10am to 7pm<br>Wednesday 10am to 7pm<br>Thursday 10am to 7pm<br>Friday 10am to 5pm<br>Saturday 10am to 5pm<br>Sunday 1pm to 4pm |
| | Greenford Library, Oldfield Lane South, Greenford, UB6 9LG | Closed Monday and Friday<br>Tuesday 11am to 5pm<br>Wednesday 10am to 2pm<br>Thursday 11am to 5pm |
| | Hanwell Community Library, Cherington Road, Hanwell, London W7 3HL | Closed Monday<br>Tuesday 10am to 1pm then 2pm to 5pm<br>Wednesday 10am to 1pm then 2pm to 5pm<br>Thursday 2pm to 7pm<br>Friday 10am to 1pm then 2pm to 5pm<br>Saturday 10am to 4pm |
| | Jubilee Gardens Library, Jubilee Gardens Health Centre, The Lodge, 2 Jubilee Gardens, Southall UB1 2TJ | Monday to Saturday midday to 5pm |
| | Northfields Community Library, Northfields Avenue, Ealing, London W5 4UA | Closed Monday and Friday<br>Tuesday 10am to 7pm<br>Wednesday 11am to 5pm<br>Thursday 10am to 7pm<br>Saturday 10am to 4pm |
| | Northolt Leisure Centre Library, Eastcote Lane North, Northolt, London UB5 4AB | Monday to Saturday midday to 5pm |
| | Northolt Library, Church Road, Northolt, UB5 5AS | Monday 10am to 5pm<br>Tuesday 10am to 7pm<br>Wednesday 10am to 7pm<br>Thursday 10am to 7pm<br>Friday 10am to 5pm<br>Saturday 10am to 5pm |
| | Perivale Community Library, Horsenden Lane South, Perivale UB6 7NT | Closed Monday<br>Tuesday 9:30am to 5pm<br>Wednesday 9:30am to 5pm<br>Thursday 9:30am to 2pm<br>Friday 9:30am to 2pm<br>Saturday 10am to 4pm |

| Borough | Location | Opening times |
|---|---|---|
| | Pitshanger Library, 143 to 145 Pitshanger Lane, Ealing, London W5 1RH | Closed Monday, Wednesday and Friday<br>Tuesday 11am to 4pm<br>Thursday 11am to 4pm<br>Saturday 9am to 2pm |
| | Southall Library and Dominion Centre, 112 The Green, Southall, London UB2 4BQ | Monday 10am to 5pm<br>Tuesday 10am to 7pm<br>Wednesday 10am to 7pm<br>Thursday 10am to 7pm<br>Friday 10am to 5pm<br>Saturday 10am to 5pm<br>Sunday 1pm to 4pm |
| | St Bernard's Hospital patient library, Uxbridge Road, Southall, UB1 3EU | Monday 9:30am to 4:30pm<br>Tuesday 9:30am to 12:30pm<br>Wednesday 9:30am to 4:30pm<br>Thursday 9:30am to 12:30pm<br>Friday 9:30am to 4pm |
| | West Ealing Community Library, Melbourne Avenue, Ealing, London W13 9BT | Closed Monday<br>Tuesday 10am to 5pm<br>Wednesday 10am to 5pm<br>Thursday 10am to 5pm<br>Friday 10am to 5pm<br>Saturday 10am to 2pm |
| **Harrow** | Harrow Council, Forward Drive, Harrow, HA3 8FF | By appointment, please contact local.plan@harrow.gov.uk |
| | Greenhill Library, Perceval Square, College Road, Harrow, HA1 1GX | Mon to Sat<br>10:00 - 18:00<br>Sunday<br>11:00 - 15:00 |
| | Kenton Library, 141 Kenton Lane, Harrow, HA3 8UJ | Closed Monday<br>Tuesday 10:00 - 18:00<br>Wednesday 10:00 - 13:00<br>Thursday 10:00 - 18:00<br>Friday 10:00 - 13:00<br>Saturday 10:00 - 18:00 |
| | Pinner Library, 78 Marsh Road, Pinner, HA5 5NQ | Closed Monday<br>Tuesday 10:00 - 18:00<br>Wednesday 10:00 - 13:00<br>Thursday 10:00 - 18:00<br>Friday 10:00 - 13:00<br>Saturday 10:00 - 18:00<br>Sunday 11:00 - 15:00 |
| | Roxeth Library, Northolt Road, South Harrow, HA2 8EQ | Closed Monday<br>Tuesday 10:00 - 18:00<br>Wednesday 10:00 - 13:00<br>Thursday 10:00 - 18:00<br>Friday 10:00 - 13:00<br>Saturday 10:00 - 18:00<br>Sunday 11:00 - 15:00 |

| Borough | Location | Opening times |
|---|---|---|
| | Stanmore Library, 8 Stanmore Hill, Stanmore, HA7 3BQ | Closed Monday<br>Tuesday 10:00 - 18:00<br>Wednesday 10:00 - 13:00<br>Thursday 10:00 - 18:00<br>Friday 10:00 - 13:00<br>Saturday 10:00 - 18:00 |
| | Wealdstone Library, 38/40 High Street, Wealdstone, HA3 7AE | Closed Monday<br>Tuesday 10:00 - 18:00<br>Wednesday 10:00 - 13:00<br>Thursday 10:00 - 18:00<br>Friday 10:00 - 13:00<br>Saturday 10:00 - 18:00 |
| **Hillingdon** | Uxbridge Library, Civic Centre, High Street, Uxbridge, UB8 1UW | Sundays 10:00 - 13:00 |
| | Botwell Green Library, East Avenue, Hayes, UB3 2HW | See website for details |
| | Ruislip Manor Library, Linden Avenue, Ruislip Manor, HA4 8TW FAO Federico Ferrari | 9 to 19:00 Monday, Tuesday and Thursday, 9 to 17:00 Wednesday, Friday and Saturday and closed on Sundays |
| **Hounslow** | Beavers Library, The Hub, 103 Salisbury Road, Hounslow, TW4 7NW | Mon: 9am to 3pm<br>Tues: 11:30am to 5:30pm<br>Wed: 11:30am to 5:30pm<br>Thurs: 9am to 3pm<br>Friday: Closed<br>Sat: 9am to 1pm<br>Sun: Closed |
| | Bedfont Library, Staines Road, Bedfont, TW14 8DB | Monday: 9.30am to 8pm<br>Tuesday: 9:30am to 5:30pm<br>Wednesday: Closed<br>Thursday: 9.30am to 5.30pm<br>Friday: Closed<br>Saturday 9.30am to 5.30pm<br>Sunday: Closed |
| | Brentford Library, 11F Boston Manor Road, Hounslow, TW8 8DW | Monday: 9.30am to 8pm<br>Tuesday: 9:30am to 5:30pm<br>Wednesday: Closed<br>Thursday: 9.30am to 8pm<br>Friday: Closed<br>Saturday 9.30am to 5.30pm<br>Sunday: Closed |
| | Chiswick Library, 1 Duke's Avenue, Chiswick, W4 2AB | Monday: 9.30am to 8pm<br>Tuesday: 9:30am to 5:30pm<br>Wed: 9.30am to 5.30pm<br>Thursday: 9.30am to 8pm<br>Friday: 9.30am to 5.30pm<br>Saturday 9.30am to 5.30pm<br>Sunday: Closed |

| Borough | Location | Opening times |
|---|---|---|
| | Feltham Library, 210 The Centre, High Street, Feltham, TW13 4GU | Monday: 9am to 8pm<br>Tuesday: 9am to 5:30pm<br>Wednesday: 9am to 5.30pm<br>Thursday: 9am to 8pm<br>Friday: 9am to 5.30pm<br>Saturday 9.30am to 5.30pm<br>Sunday: Closed |
| | Hanworth Library, Hanworth Air Park Leisure Centre and Library, Uxbridge Road, Hanworth, TW13 5EG | Monday: 9.30am to 8pm<br>Tuesday: 9:30am to 5:30pm<br>Wednesday: Closed<br>Thursday: 9.30am to 8pm<br>Friday: Closed<br>Saturday 9.30am to 5.30pm<br>Sunday: Closed |
| | Heston Library, New Heston Road, Heston, TW5 0LW | Monday: 9.30am to 8pm<br>Tuesday: 9.30am to 5:30pm<br>Wed: 9.30am to 5.30pm<br>Thursday: 9.30am to 8pm<br>Friday: 9.30am to 5.30pm<br>Saturday 9.30am to 5.30pm<br>Sunday: Closed |
| | Hounslow Library, First Floor, Hounslow House, 7 Bath Road, Hounslow, TW3 3EB | Monday: 9.30am to 8pm<br>Tuesday: 9.30am to 5:30pm<br>Wed: 9.30am to 5.30pm<br>Thursday: 9.30am to 8pm<br>Friday: 9.30am to 5.30pm<br>Saturday 9.30am to 5.30pm<br>Sunday: 11.30am to 4pm |
| | Isleworth Library, Isleworth Leisure Centre and Library, Twickenham Road, Isleworth, TW7 7EU | Monday: 9.30am to 8pm<br>Tuesday: 9:30am to 5:30pm<br>Wednesday: Closed<br>Thursday: 9.30am to 8pm<br>Friday: Closed<br>Saturday 9.30am to 5.30pm<br>Sunday: Closed |
| | Meadowbank Community Hub and Library, Community Close, Cranford, TW5 9QX | Monday: 9.30am to 8pm<br>Tuesday to Saturday: 9.30am to 5.30pm<br>Sunday: Closed |
| | Osterley Library, St Mary's Crescent, Isleworth, TW7 4NB | Monday: 9.30am to 8pm<br>Tuesday: 9:30am to 5:30pm<br>Wednesday: Closed<br>Thursday: 9.30am to 8pm<br>Friday: Closed<br>Saturday 9.30am to 5.30pm<br>Sunday: Closed |
| **OPDC** | OPDC offices, First Floor, 6 – 8 Victoria Road, North Acton, London, W3 6FF. | Monday to Thursday, 9am-5pm. |

| Borough | Location | Opening times |
|---|---|---|
| | The Collective Old Oak, Nash House, Old Oak Lane, London, NW10 6FF | Normal opening hours. |
| **Richmond upon Thames** | Civic Centre, 44 York Street, Twickenham, TW1 3BZ | Monday to Friday: 10am to 5pm on an appointment-only basis. Doors close at 4.30pm for new customers |
| | Castelnau Library, 75 Castelnau, London, SW13 9RT | Open Monday, Tuesday, and Friday 09:30am - 6pm<br>Open Wednesday 10am-7pm<br>Open Saturday 09:30am - 4pm<br>Closed Thursday and Sunday |
| | East Sheen Library, Sheen Lane, London, SW14 8LP | Open Monday, Tuesday, Thursday, and Friday 09:30am - 6pm<br>Open Wednesday 10am-7pm<br>Open Saturday 09:30am - 4pm<br>Open Sunday 1pm - 5pm |
| | Ham Library, Ham Street, TW10 7 HR | Open Monday, Tuesday, and Friday 09:30am - 6pm<br>Open Wednesday 10am-7pm<br>Open Saturday 09:30am - 4pm<br>Closed Thursday and Sunday |
| | Hampton Library, Rosehill, Hampton, TW12 2AB | Open Monday, Tuesday, and Friday 09:30am - 6pm<br>Open Wednesday 10am-7pm<br>Open Saturday 09:30am - 4pm<br>Closed Thursday and Sunday |
| | Hampton Hill Library, 68 High Street, Hampton Hill, TW12 1NY | Open Monday, Thursday, and Friday 09:30am - 6pm<br>Open Wednesday 10am-7pm<br>Open Saturday 09:30am - 4pm<br>Closed Tuesday and Sunday |
| | Hampton Wick Library, Bennet Close, Hampton Wick, KT1 4AT | Open Wednesday and Friday 10am-6pm<br>Open Saturday 09:30am-12:30pm and 1:30pm - 4pm<br>Closed Monday, Tuesday, Thursday and Sunday |
| | Kew Library, 106 North Road, Kew, TW9 4HJ | Open Tuesday and Thursday 10am-6pm<br>Open Saturday 09:30am- 4pm<br>Closed Monday, Wednesday, Friday and Sunday |

| Borough | Location | Opening times |
|---|---|---|
| | Richmond Library, Little Green, Richmond, TW9 1QL | Open Monday 09:30am-7pm<br>Open Tuesday, Thursday, and Friday 09:30am - 6pm<br>Open Wednesday 10am-7pm<br>Open Saturday 09:30am - 4pm<br>Open Sunday 1pm-5pm |
| | Teddington Library, Waldegrave Road, Teddington, TW11 8NY | Open Monday 09:30am-7pm<br>Open Tuesday, Thursday, and Friday 09:30am - 6pm<br>Open Wednesday 10am-7pm<br>Open Saturday 09:30am - 4pm<br>Open Sunday 1pm-5pm |
| | Twickenham Library, Garfield Road, Twickenham, TW1 3JT | Open Monday 09:30am-7pm<br>Open Tuesday, Thursday, and Friday 09:30am - 6pm<br>Open Wednesday 10am-7pm<br>Open Saturday 09:30am - 4pm<br>Closed Sunday |
| | Whitton Library, 141 Nelson Road, Whitton, TW2 7BB | Open Monday, Tuesday, Thursday, and Friday 09:30am - 6pm<br>Open Wednesday 10am-7pm<br>Open Saturday 09:30am - 4pm<br>Closed Sunday |
| | Information and Reference Library Old Town Hall, Whittaker Avenue, TW9 1TP | Open Monday 09:30am-7pm<br>Open Tuesday, Thursday, and Friday 09:30am - 6pm<br>Open Wednesday 10am-7pm<br>Open Saturday 09:30am - 4pm<br>Closed Sunday |

# Appendix 2: Analysis of Comments received to Regulation 18 consultation Draft WLWP December 2025 to February 2026

Abbreviations:

- CCS - Carbon Capture and Storage
- CCUS - Carbon Capture, Utilisation and Storage
- CDE - Construction, Demolition, and Excavation waste
- EA – Environment Agency
- EfW – Energy from Waste
- GLA – Greater London Authority
- LP – London Plan
- NPPF – National Planning Policy Framework
- SIL – Strategic Industrial Location
- SRN – Strategic Road Network
- WLWA – West London Waste Authority
- WPA – Waste Planning Authority

| Part of Plan (references to Draft Plan Reg 18) | Subject of representation | Representor | Response |
|---|---|---|---|
| **1. Executive Summary** | | | |
| Para 1.7 | No expectation for self-sufficiency in the provision of management capacity for hazardous waste in west London and therefore Arlington Works (a hazardous waste management site) does not need to be retained. | Sharp Refinery Service Ltd/Arlington Works | **No change proposed.** The London Plan identifies a need to protect London's hazardous waste treatment capacity (paragraph 9.8.18 of the London Plan 2021). As detailed in paragraph 5.42 of the Reg.18 version of the WLWP national policy does not include an expectation for Plan areas to achieve net self-sufficiency for the management of hazardous waste, due to its diverse nature and the need for regionally significant facilities to have an extensive catchment to capture a critical mass of waste. |
| **2. Introduction and Background** | | | |
| Para 2.9 | Draft policies should not be used to determine applications as too early in plan preparation | British Land | **Change Proposed -** Appropriate weight can be given to emerging plans in accordance with the factors set out in the NPPF. Para 2.9 wording intended to apply once WLWP is adopted. Wording amended to clarify. |
| **3. The Plan Context** | | | |
| Para 3.10 | Positive to note that the importance of the waterborne freight network is acknowledged and plan seeks to exploit opportunities for this. The opportunity to utilise the canal network should be clearly and consistently referenced for each of the areas for example in para 3.10 reference is made to the River Thames but not to the Grand Union Canal. | Canal & Rivers Trust | **Change Proposed.** Support Noted and welcomed. Reference added to Grand Union Canal offering multi-modal options. |
| Para 3.13 | Need for integration of the Waste Plan with other local and regional strategies | Hayes Town Partnership, Resident, Swifts Local Network | **No change proposed.** Once adopted this WLWP forms part of the Development Plan against which any applications for planning consent are to be determined. As local plans and the London Plan also form part of the Development Plan consideration of the policies and objectives of this Plan will be integrated into each development management decision where relevant. See Figure 3 of this Plan to show inter relationship. |

| Part of Plan (references to Draft Plan Reg 18) | Subject of representation | Representor | Response |
|---|---|---|---|
| **4. Waste Management in West London** | | | |
| Figure 3 | Improve by being larger scale and cross-reference site numbers in Appendices 2 and 3 | Colne Valley Regional Park | **Change Proposed** - Purpose of Figure 3 is to demonstrate the spatial distribution of waste facilities to show a network of sites exists across the Plan area and scale of plan considered adequate. Site reference numbers added. |
| **5. The Policy Context** | | | |
| Para 5.53 | Draft policies should not be used to determine applications as too early in plan preparation | British Land | **Change Proposed** - reference to 'following adoption' of the WLWP added. |

| Part of Plan (references to Draft Plan Reg 18) | Subject of representation | Representor | Response |
|---|---|---|---|
| **6. Vision & Objectives** | | | |
| | WLWP strategy and scope must not conflict with delivery of nationally significant Heathrow Expansion Project. Expansion of Heathrow will increase waste arisings, impact/remove safeguarded sites, and affect use of regional capacity, integration with circular economy networks, and low carbon transport. | Heathrow Airport | **Change Proposed -** Additional text added to reference the possibility of airport expansion during the Plan period added (para 3.3). |
| | Clarity and further details needed on cross-boundary waste flows and Heathrow-related contingencies. | Spelthorne Borough Council | **Change Proposed- t**ext added.<br>Para 4.24-4.26 addresses cross boundary waste flows. |
| | Add reference to joint monitoring of environmental impacts and transport implications for neighbouring authorities. | Spelthorne Borough Council | **No change proposed.** The Monitoring Framework (Appendix 1 to the Plan) includes indicators intended to capture the environmental impacts of consented waste related development and this is considered to provide sufficient detail to monitor plan implementation effectively.<br>It is not clear from the representation what type of joint monitoring is being sought. In most cases day to day operation of waste facilities is monitored by the Environment Agency, which is a national enforcement body for England. |
| | Blanket safeguarding of existing waste sites should not apply where there is surplus capacity. | L&B Holdings | **No change proposed.** The Plan's starting position is to safeguard all existing waste sites that meet the Plan's existing waste site definition (paragraph 9.8). These are listed in Appendix 2 of the Plan. Sites proposed to be released have met strict criteria set out in the '*Assessment of Safeguarded Waste Sites to be Released'* report. While certain other sites have been |

| Part of Plan (references to Draft Plan Reg 18) | Subject of representation | Representor | Response |
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| | | | proposed for release in the representations received, they do not meet the criteria and so cannot currently be released without compensatory capacity being provided. |
| | Agree with the Vision, especially the promotion of sustainable waste transport options and low emission collection vehicles | Port of London Authority | Support noted and welcomed. |
| | There is support for the Plan's vision but a call for more proactive focus on the "upper tiers" of the waste hierarchy (prevention and reuse) rather than just management and incineration. | Residents (x4) | **Support noted** and welcomed. Promoting the management of waste up the hierarchy is embedded within the Plan, particularly the vision. |
| Para 6.4 | Capacity safeguarded even though capacity is met through well-located regional facilities, therefore the site is no longer needed and ought to be released. | Sharp Refinery Service Ltd/Arlington Works | **No change proposed.** The London Plan identifies a need to provide capacity for the management of London's hazardous waste and to safeguard all existing facilities for hazardous waste treatment or disposal (paragraph 9.8.18 Policy SI9 D of the London Plan 2021). Site continues to be retained as safeguarded as site meets the WLWP safeguarding criteria/definition. |
| Para 6.5 | Over capacity (hazardous waste) and no shortfall therefore the site is not needed and ought to be released. | Sharp Refinery Service Ltd/Arlington Works | **No change proposed.** The London Plan identifies a need to provide capacity for the management of London's hazardous waste and to safeguard all existing facilities for hazardous waste treatment or disposal (paragraph 9.8.18 of the London Plan 2021). *"Without sustained action, there remains the risk of a major shortfall in our capacity to treat and dispose of hazardous waste safely*." Site continues to be retained as safeguarded as site meets the WLWP safeguarding criteria/definition. |

| **Part of Plan** (references to Draft Plan Reg 18) | **Subject of representation** | **Representor** | **Response** |
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| **Strategic Objectives** | | | |
| *SO1* | Support reference to 'Agent of Change' which is considered important in safeguarding capacity, capability and potential of waste facilities. | Port of London Authority | **Support noted** and welcomed |
| *SO3* | Support aim to use sustainable transport by safeguarding railhead and wharves | Port of London Authority | **Support noted** and welcomed |
| | Support for using waterways (canals) for waste transport, respondents raised concerns about the practicalities and localised impacts of waste movement. | Residents (9) Plus Twickenham Park Residents Association, Hayes Town Partnership & Hillingdon Canals Partnership. | **Support noted** and welcomed |
| *SO4* | Strategic Objective 4 requires best practice for protection of the environment and amenity and minimisation of adverse effects. Portakabin site suffers from litter and vermin from adjacent use and parking impact on access, so these principles need to be implemented. | Portakabin | **No change proposed.** Site specific matters would be considered through the Development Management process, including the impact on residential amenity, health, transport etc., and it's monitoring and enforcement of conditions. Where uses change, the Plan recognises the need for 'Agent of Change' principles to be applied and consideration of the impact on neighbour amenities. |
| | The Plan should set pan-London minimum biodiversity standards rather than deferring to individual borough policies. Explicitly include requirements for integrated "swift boxes" (citing NPPG Natural Environment 2025). | Swifts Local Network: Swifts & Planning Group | **No change proposed.** Setting of biodiversity standards should relate to all development and as such is beyond scope of WLWP. Para 1.5 sets out it should be read alongside adopted local plans, so where boroughs have specified specific biodiversity standards these will be taken |

| Part of Plan (references to Draft Plan Reg 18) | Subject of representation | Representor | Response |
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| | | | into account when assessing new waste development. |
| **7. Future Requirements for Waste Management Capacity** | | | |
| **Part of Plan** (references to Draft Plan Reg 18) | **Subject of representation** | **Representor** | **Response** |
| General | Concerns regarding the methodology used to calculate capacity - Table 2 (In the Assessment of Existing Waste Capacity in West London document) shows a number of sites where the capacity assessed is based on the capacity assessed in the existing WLWP or the Environmental Permit - which is at odds with guidance in the London Plan (para 9.9.2) and concerned that this does not reflect the true capacity at the relevant sites. The Mayor of London/GLA therefore has concerns about the estimates of waste capacity in the WLWP, and that it may not have the capacity to meet apportionment targets. This would amount to a **general conformity issue** if not resolved at Reg 19 consultation stage. | Mayor of London/GLA | **Change Proposed -** Some site-specific entries have been amended for consistency, and the methodology has been clarified in Capacity Assessment Report. WLLPAs remain of the view that 5-year peak prescribed in the London Plan is only intended to be used as a starting point to determine the quantum of compensatory capacity to be provided at the time of an application to release through the Development Management process. This differs to the assessment of capacity to meet apportionments . |
| Para 8.3 | If the principle of releasing waste sites is established, they should be offered to boroughs with a shortfall of waste capacity before being released (refer to London Plan para 9.8.6) and further **evidence of discussions with such boroughs should be provided** prior to the Reg 19 consultation. | Mayor of London/GLA | **Change proposed.** As set out in Paragraph 7.8 the WLLPAs invited all London WPAs to submit representations on the Regulation 18 WLWP. Three requests to share capacity were received. The WLLPAs will continue to engage with those WPAs that have made requests to share capacity and seek further details where required to fully understand the extent of the unmet needs to which such |

| **Part of Plan** (references to Draft Plan Reg 18) | **Subject of representation** | **Representor** | **Response** |
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| | | | requests relate. This is with a view to enter into agreements through mechanism such as Statements of Common Ground as set out in Paragraph 7.9. |

| 8. Future Waste Management Capacity in West London | | | |
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| **Part of Plan** (references to Draft Plan Reg 18) | **Subject of representation** | **Representor** | **Response** |
| Para 8.3 | The draft WLWP proposes the release of six existing waste sites. The assessment for waste site release is predicated on the plan area having a sufficient capacity to meet waste needs and their continued safeguarding jeopardising wider planning and regeneration objectives for specific areas. London Plan Policy SI8 is clear about the safeguarding of existing waste sites, and SI9 sets out that the proposed loss of a waste site will only be supported where appropriate compensatory capacity is made that must be at or above the same level on waste hierarchy and at least meet maximum achievable throughput of the site proposed to be lost. It appears that compensatory capacity has not been sought for the sites proposed for release.<br><br>Note that the Quattro site in OPDC is non-operational and the OPDC Local Plan states that waste uses have been relocated to other sites in West London - request further details on where the capacity has been relocated to. For the other sites, the loss of the waste capacity without compensatory capacity would likely raise a general conformity issue. | Mayor of London/GLA | **No change proposed.** Compensatory capacity is provided for the proposed plan-led site release by virtue of the capacity surplus identified. This is in accordance with LP policy that release should be 'plan-led'. The assessment of waste capacity and of site release demonstrates that the WLWP area has sufficient qualifying capacity to accommodate the London Plan apportionments and other London Plan targets, and the limited release of sites through the plan-led approach will not compromise this.<br><br>Quattro has submitted representations on the WLWP confirming that it no longer has an interest in the site in terms of land ownership or operation. Prior to this, it has also submitted representations on OPDC Local Plan to confirm that the waste uses on its former site are now accommodated on other sites in west London. |
| | Strong support for releasing Atlas Wharf, Atlas Road, and Quattro (Victoria Road) from safeguarding to allow for 8,000+ new homes and commercial district development | OPDC | **No change proposed.** Support noted and welcomed. Both sites are proposed for release, as detailed in the Assessment of Existing Waste Sites to be Released. |

| **Part of Plan** (references to Draft Plan Reg 18) | **Subject of representation** | **Representor** | **Response** |
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| | Quattro formally operated a site at Regency Street, Park Royal, NW10 6NR. The site comprised a combined waste management and concrete batching facility. The entirety of the facility was subject to a compulsory purchase order due to the land being required for HS2 purposes. Quattro vacated the site in October 2018.<br><br>The site at Victoria Road, Park Royal was formerly operated by Quattro (referenced within the Draft West London Waste Plan as 'Quattro, Victoria Road (OPDC). It is identified as being proposed for release from safeguarding on the basis that the Plan area has sufficient capacity for waste management and is identified for redevelopment in the Local Plan for non-waste uses.<br><br>Quattro no longer has an interest in the site in terms of land ownership or operation.<br><br>The loss of this site identifies further lost capacity in the area and underpins Quattro's need and requirement for other available waste sites in the WLWA area. | Quattro | **No change proposed.** Quattro no longer has an interest in the site. Based on previous representations on OPDC Local Plan, it has confirmed that the waste uses on the site are now accommodated on other sites in west London. Sites operated by Quattro including Horn Lane site (E07) and Western International Market (H02) are proposed to be safeguarded through the new WLWP. The Plan also identifies surplus capacity for C& D waste that supports the site's release. |

| 9. Proposed Policies | | | |
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| **Part of Plan** (references to Draft Plan Reg 18) | **Subject of representation** | **Representor** | **Response** |
| Para 9.28 | Should refer to assessment of i**mpact on water quality, biodiversity and landscape** | Colne Valley Regional Park | **Change proposed.** Text added |
| Para 9.28 | Should refer to **biodiversity impacts** | Herts & Middlesex Wildlife Trust | **Change proposed.** Text added |
| Para 9.48 | Should refer to Colne and Crane Valleys Green Infrastructure Strategy 2019 | Colne Valley Regional Park | **No change proposed.** The Colne and Crane Valleys Green Infrastructure Strategy does not have formal status as part of the Development Plan, but would be a material consideration for development proposals (waste-related, or other) that come forward. It can be referenced through Local Plans where relevant. |
| Para 9.5 | Need to be satisfied that 'capacity increases at waste sites over plan period' are likely to be delivered if reliance placed on them as justification for repurposing land/release of sites | Essex County Council | **No change proposed.** Reliance is instead being placed on the extensive pool of existing waste sites to be safeguarded through the WLWP, so the Plan is not dependent on these particular circumstances. |
| Para 9.5 | Additional supporting text needed to make clear that calculations of required capacity and net self sufficiency should be carried out at least over plan period based on plan-long capacity assessment | Essex County Council | **Change Proposed -** Text added to strengthen commitment to production of regular AMRs for plan period in Monitoring Section (Appendix 1- Monitoring Framework) and linkage with GLA data on monitoring net self sufficiency for London as a whole. |
| Para 9.6 | Support use of assessed capacity of sites vs 5-year peak input as it uses actual capacity rather than throughput | Essex County Council | Support noted and welcomed |

| ***Policy WLWP 1: Safeguarding and Optimising the Waste Site Network*** | | | |
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| **Part of Plan** (references to Draft Plan Reg 18) | **Subject of representation** | **Representor** | **Response** |
| Definition of existing waste sites | Definition of existing waste sites not consistent with London Plan | British Land | **No change proposed.** The WLWP sets out the locally relevant definition of a waste site to be applied to ensure the effective safeguarding of critical waste management capacity. This approach ensures all lawful waste sites are protected from unintended loss and supports long-term waste management capacity provision to ensure the Plan's Strategic Objectives are met. See further details in the response to the Mayor of London/GLA comment regarding the definition.<br>It is noted that the difference in interpretation does not actually impact on the case of release for the Hannah Close site (to which British Land' representation primarily relates), as the site is subject to a planning permission for a waste use, which means it qualifies for safeguarding both under the London Plan and the proposed definition included in the new WLWP. |
| | Support definition of a waste site which aligns with ELJWP approach | East London Boroughs | Support noted and welcomed. |
| | WLWP definition of existing waste site not in conformity with London Plan and Site does not meet proposed WLWP definition anyway | Sharp Refinery Service Ltd/Arlington Works | **No change proposed.** Site in question subject to CLUED so would meet proposed definition to be included in WLWP. as set out in Para 9.7 of the Plan. The WLWP |

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| | | | explains the locally relevant definition of a waste site to ensure the effective safeguarding of critical waste management capacity.<br>The London's Plan reliance on an Environment Agency permit and/or express planning permission alone creates a risk that lawful waste sites could fall outside of safeguarding if a permit is surrendered.<br>The WLWP therefore includes sites with extant planning consent, a certificate of Lawful Existing Use or Development (CLEUD), lawful use established through passage of time, or where waste activity is ancillary to a wider lawful use. This approach ensures all lawful waste sites are protected from unintended loss and supports long-term retention of waste management capacity.<br>See further details in the response to the Mayor of London/GLA comment regarding the definition.<br>Site in question is safeguarded through the adopted WLWP and will be retained as it meets the qualifying criteria as it is subject to CLEUD for a waste use. |
| | Discrepancies between the definitions of waste sites in the WLWP and 2021 London Plan. The London Plan defines waste sites as those with planning permission for waste use or a permit for a waste use, whereas WLWP uses a wider definition. This includes existing waste sites which are subject to an extant planning consent for waste use; have been granted a Certificate of Lawful Existing Use for | Mayor of London/GLA | **No change proposed.** The proposed WLWP definition reflects established land-use planning principles by recognising that waste uses taking place on land benefiting from:<br>• extant planning permission; |

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| | Development for waste, ancillary waste uses; and for a waste use that has become lawful through the passage of time under planning legislation. Definitions should be aligned with London Plan. | | • Certificates of Lawful Existing Use or Development;<br>• that have become lawful through the passage of time; or<br>• those ancillary to other uses<br>should be safeguarded in principle.<br><br>Sites that are only subject to an Environmental Permit for waste use and do not also benefit from the above are not included. This is because EA permits operate outside of the land use planning system and relate to pollution control. The issuing of environmental permits by the Environment Agency is undertaken with no consideration of the lawfulness of the use in land-use planning terms, with permitting being an entirely separate regulatory regime. Environmental permits are also specific to the operator and may therefore be lost, rather than being tied to the land.<br><br>The London's Plan reliance on an Environment Agency permits and/or planning permission creates a risk that sites could fall outside of safeguarding if a permit is surrendered. Also safeguarding sites based on a permit alone could risk legitimising sites which may be located in inappropriate areas, for example on land for which planning permission for a waste |

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| | | | use has been refused or is subject to enforcement action against a waste use. The WLWP approach ensures all lawful waste sites are protected from unintended loss and supports long-term retention of waste management capacity avoiding incremental loss over the Plan period within the context of strong development pressure from competing land use across west London. It is considered this approach is in general conformity with the 2021 London Plan.<br>The WLLPAs note that the current London Plan definition may be revisited as part of the review of the London Plan. |
| | Recognise the flexibility to allow release of sites where there is sufficient capacity. | Heathrow Airport | Support noted but Clause G has been deleted in light of GLA concerns.. |
| | Note no new sites are proposed to be allocated, which is welcomed.<br>Use of greener transport modes should be prioritised.<br>Scope for increase in natural screening planted to create habitat. | Natural England | Support noted and welcomed. Sustainable transport options are promoted in the Plan's vision and Strategic Objectives (SO3).<br>The purpose of Policy WLWP 1 is to protect, enhance and optimise the network of existing waste sites where transport routes are already well established.<br>Policy WLWP 2 details the requirement that proposals for new waste related development should make to the use of more sustainable transport modes where possible. |
| | Support safeguarding of existing sites. | Port of London Authority | Support noted and welcomed |

| **Part of Plan** (references to Draft Plan Reg 18) | **Subject of representation** | **Representor** | **Response** |
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| Part C | Clarify that should planning permission be granted for further temporary or permanent development then such sites will continue to be safeguarded | Quattro | **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. |
| Part E | Confirm support for clause E of WLWP1 encouraging co-location of other compatible industrial uses | Quattro | Support noted and welcomed - clause E refers to 'complementary activities'. |
| | Confirm co-located concrete batching plant is supported in principle as this makes use of recycled aggregate from waste facility | Quattro | **Change Proposed** - Part (E) of Policy WLWP 1 is primarily concerned with the co-location of waste uses with complementary activities. , ITo provide further clarity, a **footnote has been added** to explain the types of "complementary activities" that may be appropriate in this context. |
| Part J | Support clause j with regard to Agent of Change to safeguard sites from proximate development.<br>Add reference to NPPF on Agent of Change in footnote | Port of London Authority | **Change Proposed** - Support noted and welcomed. Footnote amended to include NPPF reference and noting NPPF versions may change over time. |
| | Support. Residential encroachment is an increasing issue and welcome reference to Agent of Change | Veolia | Support noted and welcomed |

| **Part of Plan** (references to Draft Plan Reg 18) | **Subject of representation** | **Representor** | **Response** |
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| Part G | Concerned that this policy is based on a misreading of the LP2021 and may amount to a general conformity issue. Part G is in direct conflict with 2021 London Plan Policy SI9 which is clear that a plan-led approach to releasing waste sites should be taken rather than an ad-hoc one. WLWP1 supports release of waste sites through the development management process without compensatory provision being secured. Adhoc release creating uncertainty that boroughs will be able to maintain meeting apportionment requirements throughout the plan period. | Mayor of London/GLA | **Change Proposed -** Part G has been deleted from Policy WLWP 1 to ensure alignment with the 2021 London Plan. The Plan now clearly supports a plan-led approach to the release of sites, consistent with Policy SI 9 of the London Plan, and does not promote site release through development management without appropriate strategic consideration of compensatory provision**.** |
| Clause I | There are a number of existing waste management sites in proximity to canal network which are proposed to be safeguarded and potentially expanded. Powerday Wharf, Scrubs Lane (OPDC/LBH&F) is hugely important as the only canal wharf available in West London, used until recently for barge-delivered waste from Camden Market and otherwise used for spoil and construction waste. It does not appear to be safeguarded. | Canal & River Trust | **No change proposed**. Powerday Wharf, Scrubs Lane falls outside WLWP area (Hammersmith & Fulham) and is therefore not included in the Plan. |
| | Not clear whether clause I is supposed to be read as saying blanket safeguarding for railheads and wharves regardless of whether they are identified on the proposals maps. Further clarity needed for future decision makers. If the intention is for these facilities to be identified on proposals maps, then should engage with Powerday to discuss whether the wharf warrants safeguarding within the Plan. | Canal & River Trust | **Change Proposed -** making safeguarding of railheads and wharves through this Plan specific to waste use, and only for the duration that such uses are associated with a waste site subject to safeguarding. Powerday Wharf, Scrubs Lane falls outside WLWP area and is therefore not included in the Plan. |
| | Policy intent of clause I not clear - Is capacity based on capacity for train movements? If so, how can this be | Day Group | **No change proposed.** |

| Part of Plan (references to Draft Plan Reg 18) | Subject of representation | Representor | Response |
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| | applied through safeguarding. Capacity will depend on rail capacity and train paths, available freight trains and wagons, ability of receptor sites to accept waste. Not clear how safeguarding for waste interacts with safeguarding for other freight uses. The Site is also safeguarded as a minerals railhead. | | 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. |
| | Remove reference to 'capacity for waste transportation' in WLWP1 clause I. Amend clause I to 'the safeguarding of the associated railhead or wharf for waste use will also cease' | Day Group | **Change Proposed -** policy wording amended as suggested |
| | Supporting text to clarify that any loss of railhead/wharf safeguarding relates to waste functions only and capacity for other uses remain safeguarded | Day Group | **Change Proposed -** policy wording amended as suggested |
| | Overlooks potential use of railheads/wharves for transhipment of aggregates - safeguarding should be retained even when waste use is lost in accordance with London Plan | Environment Agency | **Change Proposed** - policy wording amended. The policy does not seek to address wider issues relating to rail freight capacity or mineral safeguarding, which are considered through separate policy frameworks. |
| | Clause I. Does not consider feasibility of use of railheads for waste use. | British Land | **Change Proposed -** The Plan does not assume all railheads are suitable for waste use; any potential use would be subject to site-specific feasibility and operational considerations Clause (I) is intentionally flexible and includes caveat 'where it does |

| Part of Plan (references to Draft Plan Reg 18) | Subject of representation | Representor | Response |
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| | | | not conflict with other existing or planned uses'. Text amended to clarify that it is the railhead/wharf itself that is safeguarded to enable waste transport and the capacity will depend on a range of factors that need to be considered, rather than setting hard rules. |
| ***Policy WLWP 2: Provision of Additional Waste Management Capacity*** | | | |
| **Part of Plan** (references to Draft Plan Reg 18) | **Subject of representation** | **Representor** | **Response** |
| | Policy WLWP 2 seeks to support proposals for waste capacity in principle where certain criteria are met. This includes where 'The site is otherwise suitable for the proposed use and is consistent with the relevant development plan and its spatial strategy' . The Plan does not necessarily need to repeat existing policies but this part of WLWP2 seems to be taking on a significant burden in terms of the protection of the local area and environment. It would therefore be good to see recognition in the supporting text that policies (relevant development plan and spatial strategy) will need to be considered when determining for example whether proposals protect heritage, character, biodiversity, and green and blue infrastructure. | Canal & River Trust | **No change proposed.** The Plan sets out that it is to be read alongside the rest of the Development Plan, this includes adopted local plans i.e. relevant development plan and spatial strategies. |
| | Support given expansion will generate more waste in construction and operation | Heathrow Airport | Support noted and welcomed. |
| | Specifically require consultation with Greater London Archaeological Advisory Service and where necessary undertake archaeological assessment and where appropriate mitigation | Historic England | **No change proposed.** Local and London Plan policies will apply – it is considered that there is no need to |

| Part of Plan (references to Draft Plan Reg 18) | Subject of representation | Representor | Response |
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| | | | repeat in WLWP. Reference to archaeology added to para 8.42<br>Clause F3 of Policy WLWP 2 cross-refers to the need to conform with the development plan. |
| | Intensification of existing sites rather than allocation of new sites is positive. | Natural England | Support noted and welcomed. |
| | Support non-road routes (F5) and preferred locations close to railheads and wharves or SRN (para 9.23) | Port of London | Support noted and welcomed. |

| Part of Plan (references to Draft Plan Reg 18) | Subject of representation | Representor | Response |
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| | No immediate need for additional capacity noted but confirmation sought that Heathrow expansion and Colnbrook EfW closure risks have been factored in to contingency planning | Spelthorne Borough Council | The possibility of Heathrow expansion during the Plan period has now been explicitly acknowledged through addition of text, see further details in the response to the Heathrow Airport comment on the Vision.<br>Colnbrook EfW not principal plant used for management of West London's residual LACW - c17,000 tonnes of total c95,000tonnes sent to incineration in 2024 (to 7 different EfW plants). |
| ***Policy WLWP 3: Residual Waste Management & Energy Recovery*** | | | |
| Clause A2 | Provision could provide qualification re sustainable transport options from outside of Plan area esp. exports of residual and Refuse Derived Fuel | Environment Agency | **Change Proposed -** Wording for suggested qualifier text added to clause C5 of Policy WLWP 2 to promote facilities using sustainable transport methods whose catchment may extend beyond west London (to reciprocate for export of residual LACW to EfW in South Gloucestershire). |
| Clause A3. | Reasonable to accept waste from nearby areas | Environment Agency | **No change proposed.** The principal driver to provide additional capacity is to meet any unmet need within the Plan area but not to exclusion of allowing some imports. |
| Clause B. | Inconsistent with long-term arrangements that WLWA has with Suez set out at para 5.63 (Reg 19)- clarify in text. | Environment Agency | **Change Proposed -** Not considered inconsistent as "net self sufficiency" is "net" i.e. waste may leave the Plan area for management as long as an equivalent |

| Part of Plan (references to Draft Plan Reg 18) | Subject of representation | Representor | Response |
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| | | | amount is received. Terms of West London Waste Authority (WLWA) contract clarified in text may reduce minimum tonnage. |
| **Part of Plan** (references to Draft Plan Reg 18) | **Subject of representation** | **Representor** | **Response** |
| Clause C | Local need should be flexible considering WLWA exports to Avonmouth & provision for reciprocity if required. | Environment Agency | **No change proposed.** As above re: "net" - exports are to South Gloucestershire not Avonmouth, although WDI24 shows LB Lewisham accepted 41,675t (SELCHP) and LB Sutton 19,608t (Beddington). i.e. c60,000t managed in London (qualifying capacity under London Plan definition) |
| Clause E. | Part 1 not necessary as implies double-regulation of Energy from Waste facilities | Environment Agency | **No change proposed.** It is considered Part 1 is necessary for LPAs as WPAs to satisfy themselves that a facility is and will remain recovery and not become disposal and meet the efficiency performance standards for such plants set out in the London Plan. |
| | Part 2 be more explicit about plant being Carbon Capture for Use or Storage (CCUS)-ready | Environment Agency | **No change proposed.** Part 2 - concern is that being CCUS -ready will not actually mean CCUS is in place on day 1 which it ought to be. This echoes the ongoing concern around UK EfW plants being built as 'CHP ready', but many not having ever actually put heat supply in place. |
| | Any future EfW proposals should include carbon capture and local heat network integration | Spelthorne Borough Council | **No change proposed.** Noted - WLWP3 Clause D covers energy supply and Clause E2 covers CCUS. |

| ***Policy WLWP 4: Ensuring High Quality and Resilient Waste Facilities*** | | | |
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| **Part of Plan** (references to Draft Plan Reg 18) | **Subject of representation** | **Representor** | **Response** |
| Clause B(3) | Add 'contribute to communities and to the protection and enhancement of the environment | 'Colne Valley Regional Park | **Change Proposed -** Suggested wording added. |
| Clause 3.1 | Many existing sites are adjacent to designated nature conservation sites. Policy should refer to need for development to follow mitigation hierarchy. Policy clause 3.1 should be strengthened by reference to avoiding pollution of air, soil, and water | Herts & Middlesex Wildlife Trust | **Change Proposed -** wording added from WLWP4 of adopted WLWP includes "air and water borne contaminants and other emissions" |
| | Seeks cumulative impact assessments for air quality, noise and biodiversity in cross-boundary context | Spelthorne Borough Council | **Change Proposed.** Cumulative effects referenced in WLWP1 E and WLWP2 F6. Additional text added at Para 9.50 |

| ***Policy WLWP 5: Deposit of Waste on Land*** | | | |
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| **Part of Plan** (references to Draft Plan Reg 18) | **Subject of representation** | **Representor** | **Response** |
| Clause A2. | Remove as covered by permit so double-regulation | Environment Agency | **No change proposed.** The EA permitting regime operates separately to planning. WLLPAs have a duty to ensure the relevant objectives of the Waste Framework Directive are not breached (under Part 6 of the Waste (England & Wales) Regulations 2011 (as amended). They cannot be certain EA regulation of such operations will remain as is. It is considered appropriate to apply a need test to proposals at planning stage. |
| Clause B3. | Delete. Permit will cover so double-regulation | Environment Agency | **No change proposed.** It is considered appropriate to retain as provides safeguards at the planning application determination stage. |
| Clause C | Add additional clause to C to 'demonstrating the protection of water quality both for groundwater and potential run-off' | Colne Valley Regional Park | **Change Proposed -** Suggested **wording added.** |
| | Topsoil and other topsoil type materials (such as canal dredgings) are not inert but could be put to beneficial use - policy should provide clearer support for beneficial use of non-inert excavated material e.g. topsoil, sub-soil, soil and mineral based dredgings | Canal & River Trust | **No change proposed.** Topsoil not generally regarded as waste. Sub-soil is generally regarded as inert and suitable for beneficial use (and hence Clause A will generally apply).<br>Dredgings may or may not be inert depending on chemical composition (and hence Clause B more likely to apply). |

| ***Policy WLWP 5: Deposit of Waste on Land*** | | | |
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| | Expansion has potential to generate significant quantities of excavation waste that can be used in landscaping & noise attenuation | Heathrow Airport | **Change Proposed -** The possibility of expansion during the plan period is now explicitly acknowledged in the text of the Regulation 19 version of the Plan, see further details in the response to the Heathrow Airport comment on the Plan Vision. |
| | Specifically require consultation with Greater London Archaeological Advisory Service and where necessary undertake archaeological assessment and where appropriate mitigation | Historic England | **No change proposed.** WLWP5 C refers to taking account of and enhancing the historic environment. Statutory consultees will be consulted as part of the Development Management process. It is not considered necessary to include this reference in the WLWP itself. |
| | Some forms of landfill/restoration may not be compatible with aviation safety and MoD will need to review any scheme to ensure no impact on operation or capability of sites or assets. | Ministry of Defence | **Change Proposed -** clarification text added to Para 9.53**.** |
| | Recommend policy wording makes it clear that only applications which would not compromise, restrict or otherwise degrade operational capability of safeguarded MoD sites and/or assets will be supported. | Ministry of Defence | **Change Proposed** clarification text added to Para 9.53. |
| | Welcome alternative use of excavation waste - prioritise over export and import of material. | Natural England | **No change proposed.** Support noted and welcomed - although export for beneficial use not ruled out. |
| | Seeks clarity on transport routes and potential impacts on Spelthorne | Spelthorne Borough Council | **No change proposed.** This goes beyond the scope of the WLWP as no allocations proposed. Transport movements associated with proposed waste related development will be assessed as part of the Development Management process. |

| ***Policy WLWP 6: Circular Economy and Resource Efficiency*** | | | |
|---|---|---|---|
| **Part of Plan** (references to Draft Plan Reg 18) | **Subject of representation** | **Representor** | **Response** |
| | Support circular economy hubs - encourages integration with local business initiatives | Spelthorne Borough Council | Support noted and welcomed. |
| | | | |
| ***General*** | | | |
| | Water treatment for area provided by Mogden STW in LB Hounslow. A policy on waste water should be included, taking account of the need for wastewater treatment to support growth and environmental improvements, and substantial weight given to this in draft NPPF. Suggested wording for policy: '*Proposals for wastewater related development at wastewater treatment sites should be supported where demonstrated to be in accordance with the other policies in this plan and the relevant borough's development plan*'. This would accord with Policy SI5 of London Plan | Thames Water Utilities Ltd | **Change proposed -** Additional policy WLWP7 'Provision of Wastewater Treatment Infrastructure' |
| | | | |
| **7. Policies Map** | | | |
| | Some requests for boundaries of specific sites shown in Appendix 3 to be adjusted. | | **Changes proposed** to reflect lawful extent of waste uses on sites. |
| **8. Appendices** ***Appendix 1 – Monitoring Framework*** | | | |
| | No direct comments but amendments made to increase focus on GLA data on monitoring net self sufficiency across London as a whole. | | |

***Appendix 2 – List of Safeguarded Sites***

| **Part of Plan** (references to Draft Plan Reg 18) | **Subject of representation** | **Representor** | **Response** |
|---|---|---|---|
| B02<br>100 Twyford Abbey Road | 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. Will update when planning permission is granted for Collett Way and implementation timescales. Intention is for B02 to be removed as a safeguarded waste site given its planning permission for redevelopment. | On behalf of URBAN PROP 8 S.A.R.L (site owner) | Noted. |
| | Achieved planning permission for the removal of a waste transfer site with the erection of a flexible industrial use (Planning Reference: 23/0178/FUMOPDC). The compensatory provision is to be provided at 'land off Collett Way' (Planning Reference: 2405602FUL). The issue of the decision notice and S106 Agreement is imminent. | | **No change proposed.** Site retained until compensatory capacity has been built out and is ready to commence full operation. |
| | Referred to as Bridgemarts. However, the site has been sold, and the owner should be acknowledged as URBAN PROP 8 S.A.R.L. No operator and no permit for waste use, and site not intended to be used for waste in future. Profile should be updated. | | **Change Proposed -** Identity of site owner has been updated. |
| B10<br>Unit 28, Fourth Way WTF | Inputs of oil and hazardous waste have declined to c 3,705tpa (2025) incl 1,025t from inner London boroughs, and declining trend expected to continue. No plan policy requiring net self sufficiency in hazardous waste. The site has been marketed as a hazardous waste facility but attracted no purchasers. Anticipated operation will cease in 2027. Surplus capacity in London for hazardous waste for all years – the Site was assessed as contributing 4,903tpa capacity. Its loss would have | MJCS on behalf of Brent Oil Contractors Ltd (site occupier) | **No change proposed.** The Site has planning permission for transfer of waste oil so qualifies for safeguarding under WLWP definition (and London Plan definition).<br>It is not identified/allocated in a development plan for alternative |

| Part of Plan (references to Draft Plan Reg 18) | Subject of representation | Representor | Response |
|---|---|---|---|
| | no effect on overall management of hazardous waste, and safeguarding should be removed with deletion of site from Appendix 3 of the Plan. Site is a SIL and an alternative use could deliver larger benefits in terms of employment and economic objectives. | | uses and so does not meet the qualifying criteria for release through the WLWP process. Justification for release not demonstrated. |
| B12<br>Unit 2 Hannah Close | Unit 2, Hannah Close, Wembley. Site should be removed from safeguarding as NLWA will cease in near future. If not released, capacity should be reduced to 185,000tpa - the 5-year peak throughput (399,000tpa not deliverable and never been achieved and no evidence that it could be) | On behalf of British Land (site owner) | **Change Proposed** - Whether site is occupied or not is irrelevant to whether site ought to remain safeguarded. Safeguarded capacity reduced to reflect 5-year peak. |
| | Strong planning policy (London Plan) for intensified development of industrial use | | **No change proposed.** Site is safeguarded under adopted WLWP and will continue to be so under new WLWP (as per London Plan policy) . The WLLPAs followed the London Plan approach on release of existing waste sites as being through a plan-led process, and have therefore only proposed release of sites identified for allocation through their respective emerging or adopted Local Plans.<br>Hannah Close is not identified through Brent Local Plan and therefore does not qualify under that criterion for release through the WLWP. Therefore |

| Part of Plan (references to Draft Plan Reg 18) | Subject of representation | Representor | Response |
|---|---|---|---|
| | | | compensatory capacity must be provided as part of the planning application. |
| B14 Brent Transfer Station | Pleased Site B14 is safeguarded. | Veolia ES (UK) Ltd (site occupier) | Support noted and welcomed |
| 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. |
| E05 WTS Station Approach Greenford | 360 Waste Ltd - assessed capacity 3,099 tpa. Capacity should be 75,000tpa as provided by the Environmental Permit. 2024 data indicate throughput of 8,780 plus 15% freeboard is 10,097tpa. Site expected to increase throughput in future. Site has received C&D skip waste but permit provides for HIC | On behalf of 360 Waste /Bambra (site owner/occupier) | **Change Proposed -** Capacity increased to actuals in 2024**.** Application of permit limit not considered realistic as at 75,000tpa it doesn't correspond to actuals and is only for a Standard Rules permit. |
| E06 British Rail Goods Yard Greenford | Link2London (British Rail Goods Yard) - assessed capacity 131,985tpa. Capacity should be based on Permit 146,650tpa. Site expected to increase throughput in future. | On behalf of 360 Waste /Bambra (site owner/occupier) | **No change proposed**. EA permit limit already applied as bespoke, but split between C&D waste and HIC waste. |
| E07 Horn Lane WTS | Quattro Horn Lane, Acton is a WTS with CLUED manages CDEW and HIC up to 17,000tpa (limited by Permit). | On behalf of Quattro (site occupier) | **Change Proposed** - Grounds for Safeguarding entry amended to reflect existence of CLEUD. |
| | Support safeguarding of Site E07 and assessed capacity of 17,618tpa. Quattro seeking to increase capacity and would welcome discussion on this | | Support noted and welcomed. Expansion of the site is a matter for LB Ealing's Development Management process. |
| E14 | Haulage World WTS - assessed capacity 10,928tpa. Capacity should be based on Permit 75,000tpa. 2024 data indicate | On behalf of Haulage World /Bambra | **Change Proposed -** Capacity increased to 2024 actuals. |

| Part of Plan (references to Draft Plan Reg 18) | Subject of representation | Representor | Response |
|---|---|---|---|
| Station Approach, Oldfield Lane North | throughput 40,449tpa plus 15% freeboard 46,516tpa. Throughput expected to rise in future. | (site owner/occupier) | Application of permit limit not considered realistic as at 75,000tpa it doesn't correspond to actuals and is only for a Standard Rules permit .. |
| E15 Greenford Depot | Querys reliance on adopted WLWP capacity value of 101,003tpa. | Mayor Of London/GLA query | **Change Proposed -** Capacity revised to reflect actuals. |
| E20 Land off Collet Way | Referred to as being operated by Wards of London. This should be amended to Rail Logistics Consultancy Ltd. Profile should be updated. | On behalf of Urban Prop 8 S.A.R.L (site owner of B02) | **Change Proposed** - Rail Logistics Consultancy Ltd has been added to the site profile. However, the permit is held in the name of Wards of London Properties Limited so this is still referenced as well. |
| | 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). Site B02 continues to be safeguarded – owner is URBAN PROP 8 S.A.R.L. No Permit and no intention to use site for waste in future (see rep on B02 above). Operator of Collett Way (E20) is Rail Logistics Consultancy Ltd – request these details to be updated for inclusion in WLWP. | | **No change proposed**. 150,000 tonnes is referenced in the footnote for E20. |
| HI02 Airside Waste Sweepings Treatment Facility | Site HI02: Operated by Heathrow in compound to east of runway, will not be affected by proposed airport expansion. | Heathrow Airport | **No change proposed** |

| Part of Plan (references to Draft Plan Reg 18) | Subject of representation | Representor | Response |
|---|---|---|---|
| HI06<br>Land off Holloway Lane | Site HI06: Within draft Order Limit - proposed reprovision of public open space | | **No change proposed.** The possibility of Heathrow expansion during the plan period is noted, see further details in the response to the Heathrow Airport comment on the Vision - text relating to Heathrow expansion added. |
| HI09<br>Holloway Lane MRF | Site HI09: Within draft Order Limit - proposed reprovision of public open space | | **No change proposed.** The possibility of Heathrow expansion during the plan period is noted, see further details in the response to the Heathrow Airport comment on the Vision - text relating to Heathrow expansion added. |
| HI16<br>Unit 1 Wallingford Rd | Site HI16: Adjacent - unaffected by proposed airport expansion | Heathrow Airport | Noted |
| HI20<br>Cranford Lane | Site HI20: in Terminal 2 & 3 parking and operated by Heathrow and will not be affected by proposed airport expansion | Heathrow Airport | Noted |
| HI28<br>Hayes WTS | Site at Land south of Rigby Lane, Hayes (adjacent to HI28)- Portakabin is owner/occupier of site (since 1993). The site is not and has never been used for waste management and would not be put forward for such use. Consulted in error? | Portacabin | Noted |
| HO2<br>Southall Lane WIM | Support specific safeguarding as separate to adjoining HWRC at Site HO11. Support recognition the Site manages CDEW rather than just HIC. Should refer to the co-located concrete batching plant which is in accordance with WLWP1 | On behalf of Quattro<br><br>(site occupier) | **Change proposed.** Part (E) of Policy WLWP 1 is primarily concerned with the co-location of waste uses, rather than other related uses. A concrete |

| Part of Plan (references to Draft Plan Reg 18) | Subject of representation | Representor | Response |
|---|---|---|---|
| | | | batching plant would not fall within the scope of waste co-location as defined by the policy. However, it is recognised that there may be instances where activities are complementary to waste uses, for example through the utilisation of recycled aggregates. To provide further clarity, a footnote has been added to explain the types of “complementary activities” that may be appropriate in this context. |
| | Add text to confirm site will be safeguarded if planning permission granted for further temporary or permanent operation | | **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. |
| | Acknowledge operator is exploring options for relocation of CDEW and CBP in longer term - potentially to Quattro Quarry site | | Noted |

| Part of Plan (references to Draft Plan Reg 18) | Subject of representation | Representor | Response |
|---|---|---|---|
| | Confirm **assessed capacity is up to 150,000tpa** | | **Change Proposed -** Capacity assessment values adjusted to reflect feedback |
| HO3<br>St Albans Farm | Outside draft Order Limit but proposed for freight forwarding use with proposed airport expansion. Allocated as industrial site in Hounslow Local Plan Reg 22 | Heathrow Airport | Noted |
| HO07<br>Brentford Aggregate MRF | Permit figures used to assess capacity for HIC are incorrect- 255,000tpa instead of 275,000tpa. Maximum capacity is considered to be 555,000tpa (300,000tpa CDEW and 255,000tpa HIC) | On behalf of Day Group Ltd (site occupier) | **Change Proposed -** Capacity assessment values adjusted to reflect feedback |
| R04<br>Arlington Works | Site should be removed from safeguarding. Given site's size, access and location in residential area there is no prospect of an application for waste use on the site and pre-app in 2023 confirmed application would probably not be approved. | Sharp Refinery Service Ltd/Arlington Works | **No change proposed.** Site is already safeguarded under the adopted WLWP, and the waste use specific CLEUD granted in 1994 remains extant. Therefore the site will continue to be safeguarded as site meets safeguarding criteria.<br>Any proposed change to the lawful land use would have to go through the relevant Development Management process to assess suitability of the proposal against the Development Plan as a whole. (including regards to impact on residential amenity, health, transport etc.). |

| Part of Plan (references to Draft Plan Reg 18) | Subject of representation | Representor | Response |
|---|---|---|---|
| | Local respondents expressed concerns about retention of site as they consider it to be entirely unsuitable for waste management due to its location in a dense residential area. Particular concerns raised include: Unsuitability of local roads for HGV traffic, health and safety risks for children/residents, and negative impact on local amenities. | 19 residents plus Twickenham Park Residents Association | **No change proposed**. The waste use on the site is lawful/immune from enforcement action by virtue of the CLEUD granted in 1994. Therefore, the LPAs could not prevent its recommencement. See above response. |
| McGovern House (LB Hounslow) | Request to safeguard the existing road sweeper arising treatment facility. (Respondent: Wet Waste Company and McGovern Plant Hire). | | **No change proposed**. While this is an existing operation subject to an environmental permit, it fails to meet the qualifying criteria as an existing waste site as proposed in this WLWP.<br>The site operator has been invited to submit a planning application, which if determined favourably would mean the site would be safeguarded through this Plan subsequently. |

| Part of Document | Subject of representation | Representor | Response |
|---|---|---|---|
| ***Appendix 3 – Maps of Safeguarded Sites*** | | | |
| **Part of Plan** (references to Draft Plan Reg 18) | **Subject of representation** | **Representor** | **Response** |
| B16 Off Great Central Way, Neasden | Flood risk: Culverted main river along northern border - should be 8m buffer between any development and outer edge of culvert. Amendments to site must demonstrate no adverse effects on culvert | Environment Agency | **Change Proposed -** The detail requested has been included on p.7 of Appendix B - Site Specific Flood Risk Analysis. |
| | Boundary needs to be corrected - Permit covers 2/3 of site excl SE Corner. | On behalf of L&B Haulage (site occupier) | **Change Proposed** - boundary amended. |
| E06 British Rail Goods Yard Greenford | Station Road in Greenford SIL and LSIS (map appended) includes areas with waste exemptions for storage and treatment and should be collectively safeguarded - with tonnage of 350,000t. | [illegible] | [illegible] |
| HI09 Holloway Lane MRF | Site boundary of Holloway Lane MRF should include additional area certified under CLEUD 77474/APP/2022/2540 - plan provided | Powerday (site occupier) | **Change Proposed** - boundary amended |

| Part of Plan (references to Draft Plan Reg 18) | Subject of representation | Representor | Response |
|---|---|---|---|
| H15 Skip Lane Harvill Road | Crossed by or in close proximity to NGET assets: HI15 - Overhead transmission route Iver-Watford; HO07 - Ealing-Laleham tunnel. Need to ensure any re-development does not negatively impact on safe operation and maintenance of the NGET infrastructure. | National Grid | **No change proposed.** No redevelopment of these sites is planned. |
| 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 |
| HI28 Hayes WTS | Site boundary of Hayes WTS should be extended to include land to West - within operational boundary - plan provided. | Suez Recycling & Recovery UK Ltd (site occupier) | **Change Proposed** - boundary amended |
| HO07 Brentford Aggregate MRF | Site is crossed by or in close proximity to NGET assets: HI15 - Overhead transmission route Iver-Watford; HO07 - Ealing-Laleham tunnel. Need to ensure any re-development does not negatively impact on safe operation and maintenance of the NGET infrastructure. | National Grid | **No change proposed**. No redevelopment of these sites is planned. |
| RO1 Townmead CA site | Flood risk: Site R01: in FZ3 and protected to high standard but recommend finished floor levels are set above T2100 breach level to provide resilience. | Environment Agency | **Change Proposed -** The detail requested has been included on p.35 of Appendix B - Site Specific Flood Risk Analysis. |
| ***Appendix 4 – Replacement of Policies in the WLWP*** | | | |
| | No specific comments | | No action arising. |

| Part of Document | Subject of representation | Representor | Response |
|---|---|---|---|
| **A. Evidence Base** | | | |
| ***Waste Needs Reports: C,D&E Waste*** | | | No specific comments received. |
| ***Waste Needs Reports: Hazardous Waste*** | | | No specific comments received but to be updated to account for Arlington Works capacity. |
| ***Capacity Assessment*** | | | |
| **Part of Document** | **Subject of representation** | **Representor** | **Response** |
| | Concerns over methodology used to calculate capacity - Table 2 shows a number of sites where the capacity assessed is based on the capacity assessed for the extant WLWP or the Environmental Permit - which is at odds with guidance in the London Plan and does not reflect the true capacity at the relevant sites. The GLA therefore has concerns over the estimates of capacity in the WLWP which would amount to a **general conformity issue** if not resolved at Reg 19 consultation | Mayor of London/GLA | **Changes proposed.** Some site-specific entries amended, methodology clarified.<br>WLLPAs remain of view that 5-year peak is only advised in LP to determine quantum of compensatory capacity at the time of an application to release. This differs to the assessment of capacity for plan making purposes. In that regard national Planning Practice Guidance advises "using the best available information from a number of sources" (Para: 024-26 Reference ID: 28-026-20141016 |

| Part of Document | Subject of representation | Representor | Response |
|---|---|---|---|
| | BPP WNA overstates peak throughput without justification (applying 15% freeboard added) and not in conformity with London Plan | On behalf of British Land (owner seeking release of site B12 Hannah Close) | Not for Hannah Close where permit limit applied. 15% freeboard justified and found sound through WLWP2015 examination. |
| | The dWLWP evidence base contains no data in respect of the market or demand to support the capacities included within it. The lack of such data is a clear basis on which it can be shown that the dWLWP is not effective and is therefore not sound. | | **No change proposed.** Operator Survey confirmed market sentiment on the future intensity of use of certain sites. |
| | No evidence of engagement with operators in defining capacity for sites - need to make operator survey data available | | **No change proposed.** Operator survey conducted. Evidence of emails sent to Careys (landowner) who referred onto London Energy (occupier) to which no response received. |
| | Does not assess Arlington Site (ref R04). | Sharp Refinery Service Ltd/Arlington Works | **Change proposed.** The London Plan identifies a need to protect London's hazardous waste treatment capacity (Policy SI 9 Clause D London Plan 2021). Capacity assessment has been updated to reflect maximum achievable throughput capacity at the site as 13,404 tpa to reflect appeal decision in 2021 (appeal ref: APP/L5810/W/20/3249153). |

| Part of Document | Subject of representation | Representor | Response |
|---|---|---|---|
| ***Strategic Flows Report*** | | | |
| **Part of Document** | **Subject of representation** | **Representor** | **Response** |
| Table 4 | LB Enfield identified as receiving 17,674t non-inert waste from WLWP in excess of thresholds in 2023 | | **No change proposed.** WDI 2024 shows 17,563t predominately to Edmonton Atlas MRF. |
| Table 5 | States LB Enfield manages 3% of WLWP mixed MSW which is below threshold of 20%. Need for discussion over movement of waste to LB Ealing | | Noted - will clarify |
| | Don't have information about availability of waste sites and capacity to 2041. NLWP covers period to 2036. Cannot make assumptions about capacity of these sites beyond 2036. | | **No change proposed.** Unless a site has a planning consent that is time limited, it would normally be assumed that the capacity will remain available indefinitely (unless there are specific redevelopment plans that don't involve reprovision of capacity).<br>Is Edmonton Atlas MRF subject to a time limited consent or impacted by any redevelopment proposals to Enfield's knowledge? |
| | New London Plan expected in 2026 will set direction for waste policy | | Agreed |
| | Request meeting to clarify matters (about capacity of waste sites) | | Willing to meet although only site of concern to WLLPAs is Edmonton Atlas MRF. |
| | Enfield Bund Soil Management Area (NLWP ref ENF39) and Pegamoid Site (NLWP ref ENF23) identified. Enfield Bund is a | | Any idea of capacities and any end dates? |

| Part of Document | Subject of representation | Representor | Response |
|---|---|---|---|
| | new site at Holly Hilly Farm for excavation waste, which began operating in 2022 | | |
| **Part of Document** | **Subject of representation** | **Representor** | **Response** |
| ***Assessment of Safeguarded Sites for Release' report*** | | | No specific comments received. |
| ***Circular Economy Topic Paper*** | | | No specific comments received. |
| ***Waste Management Topic Paper*** | | | No specific comments received but to be updated to reflect revised capacity data. |
| ***Climate Change Topic Paper*** | | | No specific comments received. |
| **B. Integrated Impact Assessment (IIA)** | | | |
| **Part of Document** | **Subject of representation** | **Representor** | **Response** |
| Herts & Middlesex Wildlife Trust | The IIA underplays the risk of biodiversity impacts by focussing on the generic impacts of policies rather than the risk of specific impacts arising from the close proximity of waste sites to nature conservation sites. Paragraph 3.45 is unduly optimistic; firstly, SINCs do not receive statutory protection.<br>Secondly, although emerging proposals may present opportunities to manage the sensitivities of the sites and biodiversity networks, they may equally present a risk to sites in close proximity. Biodiversity net gain cannot be relied upon to make any meaningful contribution to local biodiversity. Most existing waste sites are relatively small and contain negligible biodiversity, so any biodiversity net gain is likely to be correspondingly insignificant (and likely to be provided offsite, not necessarily in the immediate area). In any case, biodiversity net gain is not designed to be used as mitigation for specific impacts; the impacts of any proposal must be considered in the usual way through the planning process following the mitigation hierarchy (firstly avoid impacts, then mitigate, finally compensate as a last resort) independently of the application of the statutory requirement for a minimum of 10% biodiversity net gain. | | **Change Proposed -** Para. 3.45 has been updated to refer to policy protection in the London Plan rather than statutory protection for SINCs, and edited to remove the reference to BNG as an example. However, it should be noted that Chapter 3 of the IIA report describes the existing sustainability issues and how they might evolve over time if the WLWP were not to be updated. Chapter 5 of the IIA report sets out the predicted effects of the WLWP policies, and clearly recognises the potential for negative as well as positive effects on IIA 7: biodiversity. As noted in para. 5.116 of the Regulation 18 IIA |

| Part of Document | Subject of representation | Representor | Response |
|---|---|---|---|
| | This further reinforces our position that Policy WLWP 4 should be strengthened to recognise the high risk of impacts to designated nature conservation sites, as described in our response to that policy. | | Report: “Although some potential minor negative effects have still been identified for the emerging WLWP policies included in the Regulation 18 plan, it is recognised that waste proposals coming forward will also need to be in conformity with the development management policies in each borough’s and OPDC’s Local Plans, as well as the London Plan. Therefore, in order to avoid duplicating requirements in relation to issues such as biodiversity protection and enhancement, use of green infrastructure and SuDS, protection and enhancement of the historic environment etc., the IIA does not have any further recommendations to make for the emerging WLWP policies.” |
| Historic England | The Integrated Impact Assessment draws attention to this weakness saying (3.41): "Although there is a high level of protection afforded historic sites within the NPPF and NPPW, more of an emphasis could be placed within the emerging WLWP on requiring any waste redevelopments to be designed and built so as to minimise adverse effects on the county's historic environment above and below ground". We agree with that comment. There is currently no reference to the historic | | **No change proposed** to the IIA. |

| Part of Document | Subject of representation | Representor | Response |
|---|---|---|---|
| | environment within the vision and objectives of the plan. Specific references to preserving the historic environment could be included for example in Strategic Objective 4 and 5. | | |

| Part of Document | Subject of representation | Representor | Response |
|---|---|---|---|
| **C. HRA** | | | |
| **Part of Document** | **Subject of representation** | **Representor** | **Response** |
| Natural England | The absence of new site allocations reduces the likelihood of direct land take or impacts on functionally linked habitats, which is welcomed. Given this the findings at Appropriate Assessment stage are acceptable and should they be adhered to should avoid adverse effects and maintain current environmental conditions. | | No action required in the IIA. The HRA comments are recorded and addressed in the separate HRA Report for the WLWP. |

| **General** | | |
|---|---|---|
| | **Document Complexity & Consultation Process** | |
| | The consultation documents are widely perceived as excessively long (200+ pages), technical, and "jargon-heavy." This is seen as a significant barrier to engagement for the average resident. There is a strong recommendation for brief synopses and better-targeted communication. | Noted - re-editing of Reg 19 to make terminology more consistent. |
| | **Recycling Access & Booking Systems** | |
| | Respondents feel the current waste site network is hampered by restrictive booking systems. These are described as a deterrent to recycling, contributing to fly-tipping and the disposal of recyclables in general waste. | Noted - provision of service is outside the scope of WLWP, but will pass concerns on to WLWA, prime service provider. |

**Requests for Capacity Sharing**

| Representor | Subject of representation | Response |
|---|---|---|
| Westminster City Council | WLWP aligns with WCC strategy for waste management, and WCC agrees with overall direction and scope. | Noted. |
| | WCC lack of capacity. In 2024/5 133kte residual MSW exported to SELCHP, plus 5,900t bulky waste to production of RDF & sent to thermal treatment in UK and EU. 42,568t of dry recycling & organic waste exported to Essex, LB Southwark, Southampton Kent & Herts. This does not account for Westminster's apportioned waste by 2041 of 200ktepa. | Thank you for sharing that data. This does indicate that the strategic relationship already exists with LB Lewisham which WLLPAs suggest is the most obvious 'port of call' to share capacity. Therefore WLLPAs would expect WCC to demonstrate why LB Lewisham cannot be relied on before establishing an alternative arrangement that doesn't reflect current flows. |
| | WCC unable to identify sites in Westminster. Current arrangements for LACW and C&I will cease due to end of agreement with LB Bexley. Strategy for CDE will remain. | Noted. |
| | WCC will need assistance from neighbouring authorities to meet its HIC apportionment and would welcome joining WLW Partnership to plan for meeting this unmet need and identifying surplus sites that could be released. | The WLLPAs remain open to discussion, subject to WCC demonstrating why existing strategic links will not deliver the required capacity. |
| | Boroughs & waste partnerships should identify surplus capacity which should be used to assist other boroughs in meeting apportionment, before sites are considered for release. | The WLLPAs are aware of the expectation of Para 9.8.6 of the London Plan 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* "in the context of meeting HIC waste apportionments. That is why they reached out early in the WLWP update process and are actively engaged in discussions. The precise level of surplus of West London existing waste sites is in the process of being finalised. Note that only 2 of the 6 sites proposed for release at present managed apportioned waste, and their |

| Representor | Subject of representation | Response |
|---|---|---|
| | | combined capacity only amounts to 18,464tpa which has been assessed to leave a surplus capacity of c0.5Mtpa. |
| LB Tower Hamlets | (LBTH) Waste Data Study (2023) informs Tower Hamlets Regulation 18 Local Plan - identifies shortfall of 192,370tpa by 2041. Lack of suitable sites so LBTH seeking excess in other areas to be shared. | Noted - pending outcome of discussions with ELJWP, with which strategic relationship already exists. Note WDI24 only shows 658t from LBTH managed at WL sites and no WL waste to LBTH. |
| | Planning permission in LLDC area for McGrath site on basis compensatory provision in LB Barking & Dagenham (River Road). Waste Data Study recommends the lost capacity of 25,353tpa be 'transferred back' to LBTH and safeguarded for its use. | Not applicable to WLWP - between LBTH and LB Barking & Dagenham (host WPA of River Road) |
| | Waste Data Study 2024 identified shortfall of 56,953tpa C&D capacity by 2041 and identifies 5.28ha of land in SILs and LISs for C&D which could meet capacity needs (85t/ha). However, also shortfall in industrial land and high rents. | Noted |
| | Waste Land Availability Study (2025) being undertaken to inform Reg 19 Local Plan. | Noted |
| | London Plan expects surplus capacity to be shared with boroughs facing shortfall. LBTH shortfalls 56,953 C&D and 192.370 HIC. | The WLLPAs are aware of the expectation of Para 9.8.6 of the London Plan 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* "in the context of meeting HIC waste apportionments. That is why they reached out early in the WLWP update process and are actively engaged in discussions. The precise level of surplus of West London existing waste sites is in the process of being finalised. Note 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. |
| | LBTH requesting 'transfer of 56,935tpa of C&D capacity from West London LPAs to ensure LBTH not reliant on non-designated sites in industrial | No expectation in London Plan to share capacity for non apportioned waste. |

| Representor | Subject of representation | Response |
|---|---|---|
| | locations better used for industrial intensification (and LBTH has shortfall of industrial land) | |
| | LBTH seeks 'transfer' of 192,370tpa HIC capacity and 56,935tpa CDE capacity. | Noted - pending outcome of discussions with ELJWP, with which LBTH has existing strategic relationship. |
| LB Lambeth | Welcome possibility for the WLWP area to provide for unmet needs elsewhere in London. Agreement (to share capacity) would need to be formalised through SoCGs. Lambeth has small shortfall in waste management capacity which could be overcome in plan period to 2035. Where Lambeth has unmet needs, it would use SoCG or similar to seek agreement (to share capacity with WLWP area). | Further detail of nature of capacity shortfall required from LB Lambeth to inform discussion if needed. |
| East London Boroughs | Encourage WLWP authorities to proactively engage with other London Boroughs re sharing surplus capacity | WLLPAs have reached out pre-Reg 18 and seeking to continue conversations once surplus confirmed. Any LBs seeking to have unmet needs met through sharing of WL capacity will be expected to meet similar tests to those set by the EL Boroughs in their discussions with other LBs (e.g. Tower Hamlets) |
| | How will capacity be assessed - suggest using criteria used in Submission ELJWP DtC Statement Appendix 2. | Agree - subject to any input/advice from Mayor of London/GLA |
| | A formal process is needed for capacity sharing across London. | Agree - this cannot be actioned just in WL. WLLPAs are liaising with the Mayor of London/GLA with regards to possible sharing of identified surplus capacity in west London and role Mayor/GLA may take. |
| Surrey County Council | No comments to raise | |

## Statutory & Other Bodies - Safeguarding issues

| Representor | Subject of representation | Response |
|---|---|---|
| Ministry of Defence | The plan area will contain and be washed over by aerodrome height, birdstrike and technical safeguarding zones for RAF Northolt. WLWP provides an opportunity to inform developers of statutory requirement to consult MoD on development that triggers criteria set out in aerodrome safeguarding plans. | Explanatory text added Para 9.53 |
| | Primary concern with waste development is birdstrike, for which mitigation may be necessary and secured through conditions and /or planning obligations. | "birdstrike" added to WLWP4 3 I. |
| Heathrow Airport | Evidence base/Need assessment should recognise Heathrow expansion and other major infrastructure development likely to place additional burden on local waste management infrastructure capacity for all streams, and potential loss of existing waste management infrastructure. Refer to Airport National Policy Statement, Draft Order Limit and reports submitted to Planning Inspectorate. | **Text added to narrative.** HIC waste amounts provided for are set by LP apportionments, and while C&D waste might be affected the forecast already includes growth scenario (to satisfy MAYOR OF LONDON/GLA request) |
| | Heathrow wants to engage re displacement of sites HI06 & HI 09 and industrial use on H03, to consider if compensatory provision is required | Willing to engage |
| | Not clear if EPR reform is taken into account in the Plan as sites may serve different functions under EPR as waste streams change in volume and composition and suitability may need review. | The possible effect of EPR reform and other initiatives should be factored into HIC waste apportionments through the London Plan revision. |
| Environment Agency | Some sites bordering main rivers may require Flood Risk Activity Permit for any amendments. | Each site has been reviewed, and a note added where a Flood Risk Activity Permit may be required, within Appendix A - Sites of the main SFRA Report. |
| | Following demise of DtCs encourage engagement on cross-boundary issues and SoCGs. Engage with RTABs via London Waste Planning Forum. | Agreed. |

| Representor | Subject of representation | Response |
|---|---|---|
| Canal & River Trust | Promote the use of waterways for freight. The use of the canals to carry freight depends on the extent required and other implications. The Trust must be contacted on such proposals as the working practises, frequency costs, management etc are key to determining suitability of proposals for freight on the waterway. | Noted |
| Port of London Authority | Support ref to Agent of Change (Obj 1) important in safeguarding capacity, capability and potential of waste facilities. Support aim to use sustainable transport by safeguarding railhead and wharves (obj 3) | Noted |
| National Grid Electricity Transmission | Policy should safeguard all NGET infrastructure; support reinforcement and expansion; ensure development located near transmission assets demonstrates it will not compromise safety, operability, maintenance access, asset replacement or future expansion; safeguard existing and potential access routes; resist development that would prejudice, constrain or render impractical access; encourage early engagement with NGET. | Noted - WLWP relates to safeguarding of waste and associated infrastructure. |
| | Sites HI15 and HO07 are crossed by or in close proximity to NGET assets: HI15 - Overhead transmission route Iver-Watford; HO07 - Ealing-Laleham tunnel. Need to ensure any re-development does not negatively impact on safe operation and maintenance of the NGET infrastructure. | Noted - No redevelopment of these sites is planned. |
| National Highways | Ensure HGV traffic does not adversely affect safety, capacity, operation of the Strategic Road Network. In W London this includes M25, M40, M3, M4, A30. General support for policies - no specific comments but expect to be consulted on applications which could impact on the safe operation of the SRN. | Noted |
| Historic England | Disappointing lack of reference to historic environment and archaeology. | Noted |
| Marine Management Organisation | Highlights policies from the South East Inshore Marine Plan and recommend reference is made to the Plan in the Policy Context section and to the requirement for a marine licence for certain activities carried out in the UK marine area. | Reference to the South East Marine Plan and UK Marine Policy Statement has been added to the review of relevant plans and programmes in Appendix A of the IIA Report |

| Representor | Subject of representation | Response |
|---|---|---|
| Herts & Middlesex Wildlife Trust | 12 Sites in Hillingdon near Sites of Importance for Nature Conservation (SNCIs): HI01, HI03, HI04, HI07, HJI08, HI13, HI15, HI16, HI21, HI24, HI28, HI29. | Development Management officers would be expected to assess the possible effect of any future development proposals on sites subject to such designations under Policy WLWP 2 Clause 6. |

# Appendix 3: Analysis of response to the Call for Sites received as part of the Regulation 18 consultation on the Draft WLWP December 2025 to February 2026

**Regulation 18 Draft WLWP**

Responses To Call For Sites Nominations

Introduction and background

This note sets out the plan making bodies' position with respect to the submissions from landowners as part of the Call for Sites Exercise undertaken as part of the Regulation 18 consultation on the West London Waste Plan (hereafter referred to as WLWP). 3 nominations have been received as follows:

1. Broadwater Lake (LB Hillingdon) by Tarmac.
2. High View Farm (LB Hillingdon) by Envar. To enable expansion of planning unit and remove the IVC composting operation;
3. McGovern Wet Waste (LB Hounslow) – regularisation of existing operation.

The detailed proposals submitted for inclusion within the WLWP for allocation are set out below, in addition to an assessment of each site against adopted planning policy requirements and the recommendations going forward.

The Call for Sites invited landowners etc to nominate land that might be suitable to host additional management capacity to meet an identified need in the WLWP. If such a need exists, and a site is deemed suitable, it might be put forward **for allocation** as land to provide waste management capacity through the Regulation 19 Plan.

It should be noted that allocation is different to safeguarding, as safeguarding normally relates to pre-existing sites although if the site were to be included in the WLWP for allocation, it would also be protected from encroachment and release for other uses through the safeguarding policies (these would need to be modified to reflect the existence of allocations were the Regulation 19 version of the WLWP to include allocations). For example Policy WLWP2 of the adopted WLWP that sets out the current safeguarding policy refers to allocations in the following terms:

> *Existing sites which have been allocated as having the potential for capacity expansion by redevelopment (Table 5-1) and new sites with potential for development for waste management facilities (Table 5-2) are also be safeguarded.*

This is intended to ensure that the allocations aren't compromised and can actually deliver the capacity intended.

**Overall Conclusion**

**Having assessed the cases set out in each of the responses for each of the three sites, there is no justification for the inclusion of the sites put forward to be allocated in the new WLWP.**

**Proposed Site 1: Broadwater Lake, Moorhall Road, UB9 6PE**

Site Context

A representation was made on behalf of Tarmac Trading Limited by Heatons Planning Consultants in relation to land at Broadwater Lake, a former sand and gravel quarry owned by Tarmac Trading Ltd. The proposed use of the site would involve the permanent deposit of non-hazardous excavation waste, to create new habitats on-site and *"..for land reclamation purposes and for shallowing the lake in certain areas in the interests of enhancing the site for wildlife*". The submission notes that there is an active planning application on the site for the redevelopment of the site to provide a new Hillingdon water sports facility and activity centre (reference: 2382/APP/2023/2906) which is due for determination this Spring. The representation states that the proposed waste use is presented as a "*back stop in the event the watersports and activity centre application is unsuccessful*."

At this time the tonnages required to create suitable shallows in unknown but the representation notes that the site as a whole measures c.79.95 hectares of which approximately 60 hectares is a waterbody.

Reg 18 WLWP context

The representation refers to Draft Policy WLWP 5 'Recovery and Disposal of Waste to Land' that acknowledges that voids created by mineral working often require restoration by backfilling. The draft plan also acknowledges that the availability of land in west London for the deposit of inert excavation waste is constrained and so such waste may be transported outside of London for management (paragraph 9.57). The representation concludes that "*therefore, former quarries such as Tarmac's Broadwater site should be utilised as much as possible as they can contribute to meeting a net self-sufficiency of waste management over the plan period and beyond*."

Current Policy Position

An application for planning permission would need to be assessed against the development plan in place at the time. Currently that would be the adopted WLWP .This includes policies relating to the provision of additional waste management capacity for Non apportioned waste set out in Policy WLWP 1 as follows:

> *Development of management capacity will be supported in principle that contributes towards net self sufficiency across the Plan area for:*
> *a. Construction, Demolition and Excavation Waste in accordance with the waste hierarchy with particular support for the production of material suitable for use as substitutes for virgin materials such as recycled aggregates*

This is in the context of para 4.4 of the adopted WLWP which states:

> "*The preference in West London is to ensure more on-site recycling and re-use on construction sites together with effective use of existing waste management sites and the appropriate provision of facilities at mineral extraction sites to ensure adequate provision of treatment capacity for this waste stream, In particular, policy encouragement is given to development of capacity for the production of material suitable for use as substitutes for virgin materials, such as recycled aggregates*."

Any such application would also need to be assessed against the development management requirements set out in Policy WLWP3- *Location of Waste Development* and Policy WLWP4 - *Ensuring High Quality Development*.

As the London Plan and Hillingdon Local Plan also form part of the development plan, consideration and requirements set out in these documents should also inform the determination of any such application. In this context, the most relevant requirement appears to be that of the London Plan (2021) which states in relation to provision of capacity of construction, demolition and excavation waste in particular:

> ***Policy SI 7 Reducing waste and supporting the circular economy***
> *A Resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration to:*
> *5) meet or exceed the targets for each of the following waste and material streams:*
> *a) construction and demolition – 95 per cent reuse/recycling/recovery*
> *b) excavation – 95 per cent beneficial use[164] (footnote 164 states All inert excavation waste should be used for beneficial uses.)*

This is within the context of Para 9.7.7

> *9.7.7 Re-use and recycling rates for **construction, demolition and excavation waste** and material (CD&E) in London is estimated between 50 – 60 per cent[167] for 2015 with some large construction projects including the Olympic Park achieving 85 – 95 per cent recovery rates. The targets for CD&E waste and material are already being set on some projects, but better data (particularly relating to reuse on site) is needed to inform performance. The adoption of circular economy principles in referable applications (and promoted in Local Plans) is expected to help London achieve the CD&E waste and material recovery targets early in the Plan period.*

On excavation waste in particular on para 9..7.9 which states:

> *9.7.9 Part A4 reflects recent **changes to the regulatory regime** that mean that the particular characteristics of excavation waste make it difficult to recover. The Mayor will continue to work with stakeholders to understand the implications of this regulatory change and to promote its beneficial use and limit the amount sent to landfill. The best environmental option practicable for the management of excavation material should be used. This could, for example, include using the material as a resource within the construction of the proposed development, or in other local construction projects, or using the material in habitat creation, flood defences or landfill restoration. In line with circular economy principles, the management of excavation waste should be focused on-site or within local projects.*

As a consequence of this Para 9.8.1 states:

> *"The term net self-sufficiency is meant to apply to all waste streams, with the exception of excavation waste. The particular characteristics of this waste stream mean that it will be challenging for London to provide either the sites or the level of compensatory provision needed to apply net self-sufficiency to this waste stream."*

Policy Position in Emerging WLWP

In light of the London Plan making a clear distinction between construction and demolition waste from excavation waste, and excluding excavation waste from the requirement for net self sufficiency, the Regulation 18 draft WLWP addresses construction, demolition and excavation waste in the following terms (Para 7.3 and 7.4):

> "*However given C& D waste is dealt with separately to excavation waste in the London Plan, each has been considered separately*." and
>
> *"As excavation waste is not subject to the expectation of net self-sufficiency, capacity has not been assessed."*

This proposed approach did not attract an adverse comment from the GLA in its response to the Reg 18 draft.

Moreover the Reg 18 draft WLWP does include a policy (WLWP5) relating to *Recovery and Disposal of Waste to Land*. This policy defines specific conditions under which proposals for other operations such as the placement of inert waste would be supported:

> *A. Proposals for the deposit of inert waste to land will be supported in principle where it is demonstrated that:*
> *1. the waste will be deposited for a beneficial purpose, which cannot practicably or reasonably be achieved in any other way; and*
> *2. the minimum amount of waste necessary will be used to deliver intended benefits or improvements; and*
> *3. It is not practical to re-use or recycle the waste.*

This is in the context of Para 9.57 which states:

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

Policy WLWP 2: *Provision of Additional Waste Management Capacity* also addresses Emerging Capacity Needs for Construction, Demolition & Excavation (C, D & E) Waste in the following terms:

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

Conclusion

Given the context as set out in Para 9.57 of the Reg 18 WLWP, which confirms that, contrary to the implication in the statement in the representation that *"..former quarries such as Tarmac's Broadwater site should be utilised as much as possible as they can contribute to meeting a net self-sufficiency of waste management over the plan period and beyond*", the management of excavation waste is not subject to the net self sufficiency test, and it therefore follows that **there is no policy expectation or need** for such sites to be "utilised as much as possible".

In addition it is considered that the inclusion of a policy that specifically contemplates proposals for deposit of inert waste to land in which need must be demonstrated, provides sufficient policy context for appropriate proposals to come forward over the Plan period. **Hence, it is concluded there is no need to include the identified land as an allocation for the proposed purpose in the WLWP.**

**Proposed Site 2: High View Farm, Newyears Green Lane Harefield**

Site Context

A representation was made by GP Planning on behalf of Envar Composting Limited in relation to land at High View Farm, an existing waste management site which includes the following waste management operations:

- an open windrow green waste composting operation (permitted by the Environment Agency to accept up to 50,000tpa),
- a waste transfer station (permitted by the Environment Agency to accept up to 20,000tpa); and
- an In-Vessel Composting (IVC) facility (permitted by the Environment Agency to accept up to 50,000tpa).

The land is subject to the following planning permissions:

- *Regularisation of the existing green waste composting operations and proposed extension to the green waste open windrow compost maturation yard*,.. 39755/APP/2023/652 (granted by LB Hillingdon 21st June 2024)
- *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* 12579/APP/2021/2010 (granted by LB Hillingdon 31st August 2022)

The representation covers a number of matters as follows:

1. Identify the land which has planning permission for open windrow green waste Composting north of New Years Green Lane so that the land can be safeguarded for waste management uses in the updated draft West London WLP.
2. Promotion of potential additional areas of land for waste management capacity under the 'Call for sites'.
3. Proposed change of use of the IVC facility (which is now redundant) into light industrial commercial uses and the release of that land from safeguarding protection under 'The Assessment of Safeguarded Site to be Released".
4. Relocation of the existing Waste Transfer Station (WTS) building to the north of New Years Green Lane.

With respect to this note, the principal issue addressed is item 2. The representation promotes the inclusion of three areas of land for allocation in the emerging updated WLWP. These lie outside the area subject to an existing planning permission:

1. Area 1 - 1.12 hectares to the north for green waste composting;
2. Area 2 - 0.16 hectares to the east for the parking of vehicles/plant and machinery;
3. Area 3 - 0.43 hectares to the east for green waste composting

So in total the response identifies 1.55 hectares of land for open windrow composting plus 0.15 hectares of land for ancillary uses.

Reg 18 WLWP context

The representation sets out the following justification for inclusion of Areas1 and 3 (Area 2 relates to a request to expand the area identified as existing for safeguarding purposes) as follows:

1) the operation is the only working green waste composting site in West London
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.
3) Environmental Permitting means green waste composting operations now need more space than it used to - more land is now needed to treat the same amount of waste than in the past.
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.
5) tighter compost quality rules 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.
6) allocating land 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.
    •

The representation claims that:

> "*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*".

Current Policy Position

The site (undefined boundaries) is safeguarded through the adopted WLWP, being listed in Appendix 2 as a Composting site (alongside Crow's Nest Farm LB Hillingdon). It is identified as providing capacity for apportioned waste, and the supporting WLWP Waste Capacity Assessment identified as providing up to 70,880tpa of capacity (tonnage being a combination of inputs to the open windrow composting operation and the IVC operation).

Were an application to come forward to expand the currently consented area to include Areas A and C it would be assessed against the development plan in place at the time. Currently that would be the adopted WLWP. If the proposal was to involve the provision of additional waste management capacity for Apportioned waste this would include the requirements set out in Policy WLWP 1 as follows:

> *Over the period to 2031, there is a need for about 614,000 tonnes of additional annual capacity to meet the apportionment set in the London Plan (2011). This is to be delivered on the allocated sites identified in Policy WLWP 2 as follows:*
> *• 162,000 tonnes in the period up to 2021*
> *• A further 221,000 tonnes (total 383,000 tonnes) in the period 2021 to 2026*
> *• A further 231,000 tonnes (total 614,000 tonnes) in the period 2026 to 2031*
> *The requirement is for capacity in the re-use, recycling, and other recovery categories.*

*Provision over and above the tonnages required to meet the London Plan (2011) apportionment and of a nature similar to that identified above will be encouraged where this would contribute towards net self-sufficiency.*

*Provision should be made in accordance with the waste hierarchy, and this should be addressed and justified as a pre-requisite of any grant of planning permission.*

However given that the proposal is not identified as providing additional capacity, rather it is intended to retain existing safeguarded capacity, Policy WLWP 2 *Safeguarding and Protection of Existing and Allocated Waste Sites* might be said to apply. This states:

*Land accommodating existing waste management uses in West London will be protected for continued use for waste management[28.] (footnote 28 states: Existing waste management sites are those sites managing waste which are lawfully permitted to do so as set out in Appendix 2. The latest list of existing waste management sites will be found in Authority Monitoring Reports. Safeguarded existing permitted facilities and allocated sites will be shown on the Policies Maps associated with each Borough's Local Plan.)*

Beyond this, there are no provisions relating to the particular circumstance identified, the erosion of existing capacity or need for additional space to maintain capacity over time, in the adopted Plan.

It might also be said that the provisions of Policy WLWP 3 – *Location of Waste Development* also apply given that it covers situations where:

*"Waste development on other sites will be supported in principle if the proposals comply with the other WLWP policies and the Boroughs' and the OPDC's adopted development plans,"*

*and:*

a. *It can be demonstrated that the development cannot be delivered at any available and suitable existing waste management site within the Borough or OPDC area[32] where the development is proposed and at the sites listed in Tables 5-1 and 5-2; and*
b. *In the case of facilities proposed for the management of MSW and C&I waste, identified sites in Tables 5-1 and 5-2 have not come forward and it can be demonstrated that there will be a shortfall in the waste management capacity required to meet the Boroughs' joint apportionment target as specified in Policy WLWP 1; and*
c. *There is no adverse cumulative effect, when taken together with existing waste management facilities, on the well-being of the local community, including any significant adverse impacts against the WLWP sustainability objectives (see Appendix 1); and*
d. *The proposed site meets the criteria set out in the subsequent WLWP Policies if applicable."*

hence any proposal that involves the provision of additional management capacity would need to demonstrate it was preferable to the sites allocated through the WLWP in an alternative sites assessment, and that a need existed.

As the London Plan and Hillingdon Local Plan also form part of the development plan, consideration and requirements set out in these documents would also inform the determination of any such application. In this context, the London Plan (2021) does not

address the circumstance of erosion of existing capacity, other than through encroachment of existing waste sites directly either (reference to Agent of Change principle at Para 9.8.20). Like the adopted WLWP, it only envisages situations where uses on existing sites are intensified, which are to be supported in principle.

Policy Position in Emerging WLWP

The site is proposed to be safeguarded for the management of 119,790 tpa of apportioned waste on the basis of the environmental permit (Appendix 3 of Waste Capacity Assessment 2025). This capacity arises from the full suite of operations listed above i.e. open windrow composting, waste transfer and IVC.

This means the site would be subject to Policy WLWP 1: *Safeguarding Existing Waste Sites: A. Waste management sites in west London will be safeguarded for their identified waste use unless otherwise identified for release.*

Policy WLWP1 relates to situations where safeguarded waste sites are proposed to be developed for waste management uses (criterion D) to increase capacity or improve its position on the waste hierarchy, which does not appear to apply here as capacity is simply being maintained. However, Policy WLWP4 would apply as such an application would involve an improvement to an existing waste management facility.

Assessment of Argument to support allocation

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.*

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.*

3) 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.*

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.*

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.*

Inter relationship 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[30] 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?

**Conclusion**

Given:

1) the lack of additional capacity being proposed;
2) the lack of an identified shortfall in capacity for the management of apportioned HIC waste in the updated WLWP; and
3) the wider context of the request for allocation where the proposer is also seeking release of a significant area of land from waste use through the updated WLWP.

it is considered that allocation of the additional 1.55 hectares of land for open windrow composting is neither necessary or justified. Hence **we conclude there is no need to include the land as an allocation for the proposed purpose in the emerging WLWP.**

**Proposed Site 3: McGovern Wet Waste (LB Hounslow)**

Site Context

A representation was made by AA Environmental Limited on behalf of McGovern Plant t/a The Wet Waste Company in relation to land at McGovern House, Amberley Way, Hounslow. This is an operational waste management site subject to an environmental permit issued by the Environment Agency in 2016 and occupies an area of 1.64 hectares.

The representation states the following:

- The site treated an average of circa 34,000 tonnes between 2022 and 2024.
- The development is operated as an ancillary activity to its plant hire business.
- The site is permitted for 74,999 tonnes per annum.
- It is a physical screening operation using high intensity washing.
- In 2024 road sweepings accounted for circa half of the total tonnage of waste received (15,400 tonnes vs 30,900 tonnes).
- The site is currently subject to a B2/B8 consent (the wider site is used for plant hire and the land use is a mixed land use (Class B8), for the storage of plant and equipment and Class B2, for the maintenance of plant and equipment).
- A retrospective planning application is being made to cover the treatment of non-ancillary wastes and some engineering alterations. The initial EIA screening opinion has been determined and no Environmental Statement is necessary (applicant H McGovern & Son Plant Hire Limited) *for the continued operation and enhancement of the non-hazardous street cleansing waste, mineral waste and aqueous wastes treatment facility.*

Reg 18 WLWP context

The representation sets out the following justification for inclusion as follows:

> "*The site should be referenced and afforded protection within the WLWA local plan. It is processing and recovering waste from activities at a nationally important infrastructure. Non-hazardous wet wastes, such as sludges, are frequently considered a problematic waste stream and whilst the through put is low this site is playing an important role managing wastes derived in West London."*

Current Policy Position

As the site commenced operation in 2016/7 it does not appear in Appendix 2 of safeguarded sites in the adopted WLWP. However as per footnote 28 of Policy WLWP 2 if the site is determined to be lawfully permitted (footnote 29 *"permitted" = granted planning permission)* to manage waste it may be added to the safeguarded site list through production of an Authority Monitoring Report and then added to the Policies Maps associated with each Borough's Local Plan were it to become lawfully permitted.

As a site subject to an environmental permit, the site is safeguarded as an existing waste site under the London Plan (2021).

Were an application to come forward to regularise the use as stated the proposal would be considered to involve the provision of up to 75,000tpa of additional waste management capacity for apportioned HIC waste (street sweepings being classed as LACW and others as C&I). This would trigger the requirements set out in Policy WLWP 1 as follows:

*Over the period to 2031, there is a need for about 614,000 tonnes of additional annual capacity to meet the apportionment set in the London Plan (2011). This is to be delivered on the allocated sites identified in Policy WLWP 2 as follows:*
*• 162,000 tonnes in the period up to 2021*
*• A further 221,000 tonnes (total 383,000 tonnes) in the period 2021 to 2026*
*• A further 231,000 tonnes (total 614,000 tonnes) in the period 2026 to 2031*

*The requirement is for capacity in the re-use, recycling, and other recovery categories. Provision over and above the tonnages required to meet the London Plan (2011) apportionment and of a nature similar to that identified above will be encouraged where this would contribute towards net self-sufficiency.*

*Provision should be made in accordance with the waste hierarchy27, and this should be addressed and justified as a pre-requisite of any grant of planning permission.*

The provisions of Policy WLWP 3 – Location of Waste Development would also apply:

*"Waste development on other sites will be supported in principle if the proposals comply with the other WLWP policies and the Boroughs' and the OPDC's adopted development plans," and:*

*a. It can be demonstrated that the development cannot be delivered at any available and suitable existing waste management site within the Borough or OPDC area32 where the development is proposed and at the sites listed in Tables 5-1 and 5-2; and*
*b. In the case of facilities proposed for the management of MSW and C&I waste, identified sites in Tables 5-1 and 5-2 have not come forward and it can be demonstrated that there will be a shortfall in the waste management capacity required to meet the Boroughs' joint apportionment target as specified in Policy WLWP 1; and*
*c. There is no adverse cumulative effect, when taken together with existing waste management facilities, on the well-being of the local community, including any significant adverse impacts against the WLWP sustainability objectives (see Appendix 1); and*
*d. The proposed site meets the criteria set out in the subsequent WLWP Policies if applicable."*

Hence to meet criterion a., an alternative sites assessment would need to be undertaken. However given the revised capacity assessment found no shortfall for apportioned waste management capacity in West London criterion b. would not be satisfied.

As the London Plan and Hounslow Local Plan also form part of the development plan, consideration and requirements set out in these documents should also inform the determination of any such application.

Policy Position in Emerging WLWP

As the site benefits from an environmental permit for waste the site was initially identified as an operational site and included in the capacity assessment, but following advice from LB Hounslow in relation to the current planning status of the site, this was removed from the Reg 18 draft WLWP.

The submission appears to be seeking to ensure the site is safeguarded through the new WLWP. Given the definition of existing waste site to be adopted, this would only be possible in the event that planning permission was granted for a waste use on the site. Any such applications would be determined against the adopted WLWP (2015) that forms part of the Development Plan.

In that situation it would be added to the safeguarded site listing in Appendix 2 of the Regulation 19 version of the new WLWP. This would then mean the site would be subject to Policy WLWP 1: Safeguarding Existing Waste Sites

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

Assessment of Argument to support allocation

Addressing each of the justifications for inclusion as follows:

- The site treated an average of circa 34,000 tonnes between 2022 and 2024.

  *The WDI 2024 shows the site as having reported accepting 30,798t of waste in total.*

- The development is operated as an ancillary activity to its plant hire business.

  *Assumed to be correct. Does the site accept waste deliveries from third parties?*

- The site is permitted for 74,999 tonnes per annum.

  *Varied permit EPR/EB3006MU dated 24/08/2020 shows this to be the case with capacity for non-hazardous waste subject to biological treatment limited to not exceed 75 tonnes per day.*

- It is a physical screening operation using high intensity washing.

  *Varied permit EPR/EB3006MU dated 24/08/2020 indicates this to be the case.*

- In 2024 road sweepings accounted for circa half of the total tonnage of waste received (15,400 tonnes vs 30,900 tonnes).

  *The WDI 2024 shows the site as having reported accepting 15,396t of street cleaning residues, 6,429t of sludges from water clarification and 7,360t of freshwater drilling muds and wastes.*

- The site is currently subject to a B2/B8 consent (the wider site is used for plant hire and the land use is a mixed land use (Class B8), for the storage of plant and equipment and Class B2, for the maintenance of plant and equipment).

  *Tbc - note some waste uses have been allowed under B2/B8 in the past, but generally it is sui generis (and hence requires express permission).*

- A retrospective planning application is being made to cover the treatment of non-ancillary wastes and some engineering alterations.

  *Tbc*

**Conclusion**

Given:

1) the use involves the management of HIC waste to which the London Plan apportionment relates;
2) the Waste Capacity Assessment for the new WLWP does not identify a capacity shortfall for apportioned HIC waste;
3) the use is to be subject to a planning application which is likely to be determined in advance of adoption of the updated WLWP;
4) the primary request relates to inclusion of the site for safeguarding which can be achieved should an application for regularisation be submitted and if permission is granted in the future;

it is considered that inclusion of the site for allocation is neither necessary or justified. Hence **it is concluded there is no need to include the land as an allocation for the proposed purpose in the WLWP.**

# Appendix 4: Schedule with Summary of Representations received to the Regulation 19 consultation on the Proposed Submission WLWP August 2026 to September 2026

Representations received through the consultation website and those received by email [and post] are combined in a single schedule. Each representation has a unique reference number (Rep No.).

Table A4.1 sets out representations on the Proposed Submission WLWP in Plan order. Representations on evidence base documents are listed against the part of the Plan to which they relate (for example paragraph 2.17, which lists the evidence base documents), and representations on specific safeguarded sites are listed under Appendix 2 of the Plan by site reference. Where a representation relates to more than one part of the Plan, it is listed against the principal part, with a cross-reference entry (See also Rep No. …) at each other relevant part.

Tables A4.2 and A4.3 set out representations on the Integrated Impact Assessment and on the Habitats Regulations Assessment respectively.

The column headings follow the Regulation 19 response form. The reasons for each representation and the modification(s) sought are summarised; the representations are published in full [(redacted)] at [link].

Rep Nos take the form [respondent number].[point number]. Respondents are numbered in alphabetical order, organisations first (by name) followed by individuals (by surname). Where a representation was made by letter or statement rather than on the response form, the legally compliant and sound columns are blank unless this was explicitly stated in the representation. Please refer to the summary of the issue and the full (redacted) representation. If the legal compliance and soundness questions have been filled in on the response form, then the answers are included in the schedule in the respective columns. The schedule shows where any personal information within responses relating to contact details, particularly full address or location data, has been removed for data protection.

**Table A4.1: Representations on the Proposed Submission WLWP**

| Rep No. | Respondent name | Organisation (if given) | Part(s) of Plan responding to | Do you consider the Plan to be: | | Summary of issue(s) raised in representation | Modification(s) considered necessary by representor | WLLPAs' response |
|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| **General comments on the Plan as a whole (including legal compliance and procedural matters)** | | | | | | | | |
| 01.2 | DP9 Ltd (agent) | British Land Properties Limited | Whole Plan | No | No | Legal tests: the dWLWP is required to be produced (tests at para 36 of the 2024 NPPF: positively prepared, justified, | | Noted. The WLLPAs consider that the WLWP has been produced in accordance with the relevant statutory requirements. |

| Rep No. | Respondent name | Organisation (if given) | Part(s) of Plan responding to | Do you consider the Plan to be: | | Summary of issue(s) raised in representation | Modification(s) considered necessary by representor | WLLPAs' response |
|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | effective, consistent with national policy).<br><br>Under s24 of the PCPA and Regulation 21 of the 2012 LP Regs the Plan must be in general conformity with the SDS (the London Plan 2021) and the Mayor's opinion must be requested; it is assumed that a response from the GLA is awaited. Where the dWLWP is not in general conformity, it will not have been prepared in accordance with a relevant legal requirement. (Refers to London Plan paras 0.0.23–0.0.24: local approaches only where the London Plan says so, or where locally-specific evidence shows it would better achieve London Plan objectives and is in general conformity.)<br><br>London Plan Policy SI8 does not in any way, … require nor advocate for, any significant surplus of capacity as compared to the apportioned tonnages. This would be contrary to the policy requirement for a sufficient number of sites to be allocated to achieve net self-sufficiency. Some surplus to plan prudently for a reasonable worst case is acknowledged, but any significant surplus level would go beyond this and would not be in conformity with the London Plan, | | The GLA has responded, have raised a general conformity concern regarding the release of selected sites from safeguarding without compensatory capacity and connected to the need to offer surplus capacity to authorities with an unmet need (see Reps 09.1, 09.3 and 09.6–09.8).<br><br>Noted - These criteria relate to how the quantum of compensatory capacity required might be assessed post adoption of the Plan, rather than whether sites can be released with no compensatory provision being made.<br><br>Comments noted. The Submission Plan continues to support the safeguarding of sites with an established lawful waste use as part of a locally justified and evidence-based approach to safeguarding existing and potential waste management capacity, consistent with the objectives of the London Plan safeguarding framework. Therefore, additional |

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|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | particularly when having regard to tensions this gives rise to with other London Plan policies such as the encouragement of industrial intensification.<br><br>London Plan para 9.9.2 provides that any proposed release of current waste sites … should be part of a plan-led process; There is no recognition in the dWLWP that any proposed release … should be part of a plan-led process.<br><br>The Policy WLWP 1 Part F factors (and para 8.19 on wider market conditions) are plainly relevant when considering the removal of a site, and it is incumbent on the WLLPAs to apply them at the plan-making stage. The submissions are principally that there is a significant surplus of land and capacity (including future intensified and optimised capacity on sustainably operating waste sites) in the West London area and across London as a whole, which must call into question with a sharper focus the continued safeguarding of sites with strong policy support for other industrial uses; Evidently, the WLLPAs agree with this position, hence the Policy WLWP 1 release criteria. The failing of the dWLWP is that | | modifications are not considered to be necessary.<br><br>Representation regarding definition noted. The alternative definition is set out in paragraphs 8.8 to 8.9 of the WLWP.<br><br>Representation noted the WLLPAs consider that the WLWP is in general conformity with the London Plan and that it is sound and legally compliant. |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | 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.<br>Draft Policy WLWP 1's definition of existing safeguarded waste sites (including sites with planning consent or CLEUDs, or deemed lawful) is a departure from the London Plan 2021 definition.<br><br>Having regard to the above and the London Plan policies supporting industrial intensification, it is submitted that the dWLWP is not in general conformity with the SDS for London, being the adopted LP. The 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). | | |
| 06.1 | Charlotte Mann | Environment Agency | Whole Plan | | | Have reviewed the documents and examined the challenges, opportunities and key policy themes presented, in consideration of environmental constraints within the EA's statutory remit.<br>Generally supportive of the proposed WLWP and pleased that many of our comments to | | Noted and support welcomed. |

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|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | the Regulation 18 have been made within this submission. | | |
| 06.2 | Charlotte Mann | Environment Agency | Whole Plan | | | Flood risk: Satisfied that previous comments have been incorporated. No further comments are necessary at this time. | | Noted. |
| 07.1 | Rob Slater | Essex County Council (Minerals and Waste) | Whole Plan | | | Essex County Council has no further comments to make. | | Noted. |
| 08.1 | Frederick Bomford | FM Conway Ltd | Whole Plan | Yes | Yes | Overall, the Regulation 19 Consultation appears to be written in accordance with national guidance and in compliance with the relevant legal and procedural requirements, namely:<br>• Do not compromise safeguarded waste infrastructure;<br>• Maximise reuse and recovery of construction material;<br>• Prevent pollution to land and water;<br>• Minimising transport impacts;<br>• Demonstrating strong environmental management and circular economy. | | Noted and recognition welcomed. |
| 09.1 | Nina Miles (for the Mayor of London) | Greater London Authority | Whole Plan | This letter follows on from earlier advice and | | All Development Plan Documents in London must be in general conformity with the London Plan. | Please see reps 09.2-09.9 | Noted. The WLLPAs consider that the Plan is in general conformity with the 2021 London Plan. Please see |

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|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | 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). | | The Mayor provided comments on the Regulation 18 draft WLWP. GLA officers met with the West London waste planning group 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.<br>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 | | responses set out under 09.2- 09.9. |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | London Plan gain more weight as it moves towards publication in 2028. | | |
| 09.2 | Nina Miles (for the Mayor of London) | Greater London Authority | Whole Plan | | | 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.<br>The WLWP boroughs have a pooled apportionment of 2,221,000 tonnes per annum (tpa) to 2041.<br>The draft Plan identifies that West London will have a capacity of 2,578,741 tpa by 2041. According to Table 2 of the draft WLWP, this is forecast to result in a surplus of approximately 357,000 tpa.<br>Commend the draft WLWP for its positive approach to planning for identified waste needs and meeting the LP2021 apportionment targets. | | Noted and support welcomed. |
| 09.3 | Nina Miles (for the Mayor of London) | Greater London Authority | Whole Plan | | | 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. | | Noted. The WLLPAs consider that the Plan is in general conformity with the 2021 London Plan. Please see responses set out under 09.6 and 09.8. We will continue to engage with the GLA as we progress towards examination, including exploring the potential for a Statement of Common Ground. |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | Would welcome further discussions on these aspects of the draft WLWP prior to it being submitted for examination. | | |
| 10.1 | Husain Akhtar | Harrow Monitoring Group | Whole Plan – consultation and engagement; governance | Yes | No | Legal compliance: "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." Soundness: "Its principal representation is that aspects of the Plan require strengthening before it can convincingly demonstrate soundness, particularly in relation to effectiveness and justification; it therefore raises an objection on soundness."<br>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*."<br>Supports the preparation of an up-to-date WLWP and recognises the environmental importance of reducing waste, increasing reuse and recycling, promoting the circular economy and ensuring sufficient waste-management capacity. "Our concern is therefore not with the existence of a waste plan but with whether this particular Plan adequately demonstrates that its | 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."<br><br>Overall: the Plan "should be modified before adoption to strengthen | The general support for the principle of a planned approach to waste is noted and welcomed. Communities will be notified of proposals related to existing waste sites in accordance with the statutory requirements of the planning process. Any additional engagement over and above these requirements will be undertaken on a case-by-case basis.<br><br>The WLWP has been tested as part of the IIA process to minimise environmental burdens.<br><br>All Regulation 19 representations will be published as an appendix to this statement.<br><br>The authorities will submit what they consider to be a sound plan to the government for examination |

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|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | strategic objectives will be achieved fairly, transparently and without imposing disproportionate environmental burdens on particular communities."<br>The WLWP "is not simply a technical waste-management document": once adopted it will influence decisions about waste-related development across West London until 2041; in Harrow it proposes continued safeguarding of Forward Drive and 151 Pinner View, and "the consequences of such decisions can be highly local even though the planning strategy is sub-regional."<br>Welcomes that the consultation is available online and that documents can be inspected at Harrow libraries and the Council Hub. However, there is "a fundamental tension" between inviting views from "local communities" and presenting a consultation whose effective entry point is the specialist language of planning law. Statutory complexity does not remove the responsibility of public authorities to make participation intelligible to ordinary residents.<br>The volume of supporting material (Plan, IIA, HRA, flood-risk assessments, waste-flow and capacity studies, topic papers, consultation statement, | environmental justice, cumulative-impact assessment, transport safeguards, site-specific transparency, monitoring and community engagement". | by an independent planning inspector. All supporting evidence and documentation will also be submitted, including an Integrated Impact Assessment, which has been undertaken to assess the performance of the plan against a range of sustainability objectives. The Inspector will consider any modifications that are necessary to make the plan sound as part of the examination process.<br><br>Consultation activities and have been undertaken in accordance with the requirements of the statutory planning process and the Statements of Community Involvement from the participating authorities. This aspect will also be tested during the examination process.<br><br>In addition to making the documents available online and in selected locations, online and in person drop in sessions were held to explain the purpose of the document and its technical content.<br><br>The consultation response form reflected the specific questions that relate to this |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | protocol, guidance notes etc.) illustrates the problem: much of this evidence is technically necessary, but "It does not follow that presenting it constitutes meaningful community engagement."<br>Residents near a safeguarded site are more likely to ask: more heavy lorries? which roads? air quality? more noise, dust or odour? risks to children, older people and people already in poor health? could the site expand, with what safeguards? how will impacts from different developments be considered together? why here? "The consultation architecture does not foreground those questions sufficiently."<br>Accessibility "is not achieved merely because documents can be downloaded or inspected in a library"; it requires plain-English explanations, proportionate summaries, understandable maps and site-specific information.<br>A consultation across seven planning authorities generating only 77 responses should trigger analysis of why participation was so limited; an effective Plan requires continuing community engagement, particularly around safeguarded sites.<br>The response form questions (part of Plan, legal compliance, | | stage of the plan making process. However, guidance on how to make representations was made available on the consultation portal during the consultation process.<br><br>The number of responses received reflects the technical and specific nature of the WLWP.<br>The evidence supporting the plan is considered to be proportionate. Comments regarding matters such as HGV movements are noted, however, no additional sites are proposed in the plan and it is not considered that policies will result in additional infrastructure requirements.<br><br>Overall, additional modifications are not considered necessary to ensure the soundness of the WLWP. |

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|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | soundness, modifications, hearings) satisfy the procedural requirements of Regulation 19 but are designed principally around the plan-making and examination process rather than how residents experience environmental impacts.<br>Nor does the consultation directly ask whether the authorities have succeeded in engaging residents living closest to safeguarded sites. "That is an important omission."<br>Governance (acknowledged as extending "beyond the narrow wording of the WLWP"): delegated 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; the resolution does not establish an objective public definition of "significant". By comparison, Brent retained a final Full Council decision after consultation. Legality and democratic accountability are different tests; residents should be able to see how their representations have influenced the final document before submission.<br>Sustainable waste planning "is also about people and places". Communities should not be expected to accept environmental burdens simply | | |

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|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | 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 be not only whether West London has enough capacity to 2041 but whether that capacity is planned and managed in a way that is "environmentally sustainable, socially equitable, locally accountable and capable of retaining public confidence." | | |
| 11.4 | Emily Fitzpatrick | Heathrow Airport Limited | Whole Plan – national policy context (ANPS / draft HENPS); EPR | See 11.1 | See 11.1 | HAL is bringing forward the Heathrow Northwest Runway Scheme, 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 reaffirmed support for the scheme and designates it as Critical National Growth Infrastructure (CNGI), its delivery "strongly supported by the Government (paragraph 2.39)."<br>"The ANPS and replacement HENPS, once designated, are | Reflect the status of the ANPS and replacement HENPS (once designated) in WLWP policies (no wording proposed beyond Reps 11.1–11.3). | Noted<br><br>Noted |

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|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | 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."<br>HAL submitted an EIA Scoping Report to the Secretary of State in May 2018 and an EIA Scoping Report Addendum in September 2025; the latest draft DCO boundary (Addendum Figure 2.1) is provided as Appendix 2. HAL notes the Consultation Statement response to its previous comments on incorporating Extended Producer Responsibility (EPR) "and acknowledge this is expected to be factored into the New London Plan preparation."<br>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." Appendix 1 attaches HAL's Regulation 18 representations (30 January 2026), summarised in the letter as: the need for the WLWP to consider the impact of Heathrow expansion on waste demand; where safeguarded sites will be impacted by expansion and subject to emerging Local Plan site allocations; support for the | | Noted<br>Noted<br>Noted, recognition welcomed.<br>Noted |

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|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | flexibility in Policy WLWP 1 to allow removal of safeguarded sites where sufficient capacity remains in the plan area; and clarity on whether EPR reform had been taken into account. | | |
| 17.1 | Calum Chipman | London Borough of Lambeth | | Yes | Yes | Lambeth Council welcomes the opportunity to comment on the proposed WLWP. 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.<br>(see Reps 17.2–17.5). | None. | Noted. |
| 20.1 | Marie Canny | Marine Management Organisation | Whole Plan | | | The Inspector may seek reference to the South East Marine Plan, for the reasons stated in the MMO's Regulation 18 response (attached to the representation), and to the requirement for decision makers to take the Marine Policy Statement and marine plans into account under the Marine and Coastal Access Act 2009.<br>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 | | Noted. The WLLPAs' response to the MMO at Regulation 18 recorded that reference to the South East Marine Plan and UK Marine Policy Statement had been added to the review of relevant plans and programmes in Appendix A of the IIA Report.<br>The marine licensing and terrestrial/marine interface points are also noted. Any relevant planning decisions will have regard to the Marine Plane, and any relevant marine planning and licensing considerations, for |

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|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | Marine Plan (in this case the South East Marine Plan) or the UK Marine Policy Statement, unless relevant considerations indicate otherwise. This includes local authorities developing planning documents for areas with a coastal/tidal influence. Advises that all marine plan objectives and policies are taken into consideration by local planning authorities when plan-making.<br>These are recommendations; suggests that the WLLPAs complete their own interpretation of the South East Marine Plan, and refers to the South East Marine Plan and Explore Marine Plans for further information.<br>The attached Regulation 18 letter also identifies the terrestrial/marine overlap along the tidal Thames to Teddington, marine licensing below mean high water springs, and recommended Marine Plan policies on landing facilities, infrastructure, heritage, landscape, climate resilience and environmental protection. | | any planning activity below mean high water springs including sections of a tidal Thames. |
| 21.2 | Fisher German LLP (agent) | National Grid Electricity Transmission | Whole Plan – NGET electricity transmission infrastructure (general) | See 21.1 | See 21.1 | NGED, National Gas Transmission, National Grid Ventures and NESO are separate from NGET and should be consulted separately; early engagement with NESO recommended to establish available supply capacity to | 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 | The content of the WLWP focuses on waste related development. It should be read alongside the other parts of the development plan and the policies that are relevant to utilities infrastructure, and national |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | potential development sites and any reinforcement required.<br>The Council should ensure development proposals near transmission assets demonstrate they will not compromise safety, operability, maintenance access, asset replacement or future network expansion; should safeguard existing and potential access routes for Abnormal Indivisible Loads (AILs), 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."<br>In planning for the area the Council should: safeguard all existing NGET transmission assets (overhead lines, underground cables, substations); support future reinforcement and expansion, including the Great Grid Upgrade; ensure proposals near assets do not compromise safety, operability, maintenance access, asset replacement or future expansion; safeguard AIL access routes; resist development or highway alterations prejudicing AIL access unless mitigation or alternative routes are secured; and encourage early engagement with NGET. | 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) … 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 …"<br>(no specific Plan wording proposed; the specific policy wording sought is at Rep 21.1). | decision making policies in the NPPF. It is not necessary for the WLWP to repeat these polices.<br><br>Additional modifications are not considered necessary to ensure the soundness of the WLWP. |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | Further guidance attached: NGET policy is to retain existing overhead lines in situ (save exceptional circumstances, e.g. proposals of regional or national importance); NGET design guidelines for development near pylons and overhead lines; statutory safety clearances must not be infringed, including by changes to ground levels; guidance on substation operational noise and the 'Agent of Change' principle; Regen/DESNZ guidance for LPAs on assessing electricity network infrastructure applications.<br>NGET wishes to be involved in the preparation, alteration and review of plans and strategies that may affect its assets, and asks to be consulted on any DPD or site-specific proposals that could affect its assets and for its details to be added to the consultation database. | | |
| 22.1 | Martin Hempell | National Highways | Whole Plan | | | 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. | | Noted and welcomed. |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| 27.1 | Michael Atkins | Port of London Authority | Whole Plan | Yes | Yes | Has reviewed the draft plan and can confirm the PLA has no comments to make on the draft document.<br>Supports 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.<br>Welcomes 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. | | Noted and welcomed. |
| 31.1 | Michael Singham | Richmond & Wandsworth Councils (Richmond Council Waste Service) | Whole Plan | Yes | Yes | No comments submitted (responding on behalf of Richmond Council's Waste Service). Form indicates Plan considered legally compliant and sound. | | Noted |
| 32.1 | Calli Yau | Rotherham Metropolitan Borough Council | Whole Plan | *Yes* | *Yes* | Has reviewed the documents and has no comments to make at this stage.<br>On this basis, the Council has not identified any significant cross-boundary waste planning | | Noted. |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | matters that would affect Rotherham. | | |
| 35.1 | Laura Waters | Spelthorne Borough Council | Whole Plan – strategy, objectives and evidence base; cross-boundary cooperation | Yes | Yes | Supports the overall strategy and objectives of the Proposed Submission West London Waste Plan and considers the supporting evidence base to be generally robust. 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.<br>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.<br>Spelthorne considers a number of modifications would improve the effectiveness of implementation of the Plan over the plan period (see Reps 35.2–35.5). | Strengthen references to ongoing cross-boundary cooperation regarding strategic waste movements, infrastructure resilience and environmental management.<br><br>(see Reps 35.2–35.5). | Noted<br>The request for continuing cross-boundary liaison is noted. The Strategic Cooperation Statement records the engagement undertaken. |
| 36.1 | Vijay Gandhi | Landowner, Stockley Park | Whole Plan – Stockley Park (UB11) | | | A significant landowner at Stockley Park, UB11, owning nine buildings within the park; currently reviewing the Plan and evidence to understand whether any of its properties or wider land interests are affected by a | | Noted.<br>Confirmation that no sites within the Stockley Park site have been safeguarded for a waste use has been sent to the respondent. |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | 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, intends to promote appropriate parts of its Stockley Park portfolio for modern industrial and employment uses.<br>Therefore has a particular interest in ensuring that the WLWP: does not impose an unintended waste-site safeguarding designation on any of its 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; and is coordinated with Hillingdon's emerging Local Plan and the treatment of Stockley Park in the Draft London Plan 2026.<br>Asks for confirmation 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; offers a schedule of property addresses and a site plan. | | |

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| | | | | | | Asks to be registered as a landowner and stakeholder for further notifications (submission for examination; publication of the Inspector's report; adoption).. "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."<br>Asks that its interest as a major Stockley Park landowner be brought to the attention of Hillingdon Council's Planning Policy team for engagement on the emerging Hillingdon Local Plan and any future masterplanning of Stockley Park.<br>Asks for confirmation of receipt and to be advised if further property information is required. | | |
| 37.7 | Emma Smyth | SUEZ Recycling and Recovery UK Ltd | Whole Plan | *Yes* | *Yes* | SUEZ Recycling and Recovery UK Ltd has a longstanding interest in several sites which it operates within the Plan Area. SUEZ trusts that the representations will be of assistance and would welcome the opportunity to engage further with the waste planning authorities as the WLWP progresses (see Reps 37.1–37.6). | | Noted. The Regulation 19 consultation is the final stage at which representations can be made before submission; after this stage, further submissions may only be made if invited by the Inspector. |
| 39.1 | Dustin Lees | Surrey County Council (Minerals and Waste | Whole Plan – strategic waste movements | | | Surrey (as MWPA) was consulted on the Regulation 18 draft and responded on 2 | | Noted and welcomed.<br>The reported closure date of Patteson Court Landfill is recorded in Table 3 |

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| | | Planning Authority) | | | | February 2026 with no comments.<br>In its response (11 November 2025) to the West London Alliance's Duty to Cooperate letter on strategic waste movements, Surrey noted that strategic quantities of waste from West London were managed at two Surrey facilities – Patteson Court Landfill, Redhill, and Homers Farm Inert Landfill, Staines-upon-Thames – 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.<br>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. | | (Appendix 1) of the Waste Management Topic Paper |
| 41.1 | George Dagg | Waverley Borough Council | | | | At this stage we have no comments to make in relation to this Proposed Submission version. | | Noted. |
| 42.1 | Richard Cressey | Westminster City Council | Whole Plan | Yes | Yes | 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 | | Support noted and welcomed.<br>Matters raised in the representation will be progressed through a Statement of Common Ground. See also further |

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| | | | | | | general conformity with the London Plan. Supports the overall vision, strategic objectives and policies; in particular 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. Agrees with the aim to maximise use of sustainable transport methods to reduce emissions from transport waste as much as possible.<br>The WLWP ambitions greatly align with Westminster's own strategies (Municipal Waste Management Strategy 2016–2031, Environment SPD and City Plan (2026)): promoting the circular economy, managing waste at the top of the hierarchy, transitioning to low-carbon freight and safeguarding waste infrastructure. This alignment places Westminster in a strong position to become a committed and constructive partner within the West London Waste Plan partnership. | | details of engagement in the Strategic Cooperation Statement. |
| 43.1 | Moosa Abuelzein | | Whole Plan | Yes | Yes | Within the law of the waste management. It needs to be fairer due to the economy struggle and keeping the environment clean. | | Noted |
| 45.1 | Paul Bacchus | | | Yes | Yes | Vehicle movement. | | Noted. |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| 48.1 | Mohamed Hanafy | | Whole Plan – overall strategy and spatial approach | Yes | No | Soundness: considers 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. Considers the Plan legally compliant, but has 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; concludes that the Plan "is not fully justified and may not meet the soundness tests". The Plan requires further justification to demonstrate that it is the most appropriate strategy when considered against reasonable alternatives.<br>The Plan proposes to retain and safeguard land within West London for waste management uses. 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.<br>The Plan should demonstrate that it has properly assessed the | Amend the Plan 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.<br><br>Update the supporting evidence base to demonstrate how alternative approaches were assessed and why the proposed allocation of waste infrastructure within West London is preferred. | Representation noted. See also response to 48.2. Chapter 4 of the IIA outlines the reasonable alternatives considered for the WLWP. Issues 1a and 1b addressed the approach to the spatial strategy, and Issue 1b, Option 2 focused on using facilities outside the Plan area. This was assessed in the IIA, in Appendix E. |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | 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.<br>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.<br>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, does 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. | | |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | 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 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.<br>The current approach should demonstrate, through evidence, why multiple smaller facilities within West London provide greater overall sustainability benefits than alternative strategic options, comparing whole-life carbon impacts, transport movements, congestion effects, land use efficiency, future adaptability of facilities, and economic and regeneration impacts.<br>The Plan should give greater consideration to an approach | | |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | based on fewer, larger, strategically located facilities designed to be adaptable and future-proof. Larger facilities may provide greater opportunities to invest in advanced sorting, recycling and resource recovery technologies, and may be easier to retrofit and upgrade than multiple smaller facilities where space, access and investment capacity may be more constrained.<br>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, which may reduce unnecessary vehicle movements associated with transporting similar materials from multiple smaller sites to common processing locations.<br>The Plan should 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 — considering future changes in recycling technology and waste streams; the ability to retrofit and expand facilities; overall transport movements and carbon impacts; | | |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | the efficiency of moving recovered materials into the circular economy; and the opportunity cost of using scarce London land for waste infrastructure compared with other strategic needs.<br>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. | | |
| 51.1 | Tony Leigh | | | Yes | Yes | Waste management is a huge undertaking for any organisation, bigger than initially realised. Nevertheless, some sort of summary document would have been useful. The video was helpful but too full of jargon.<br>From what he understood, his 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.<br>Would be interested to understand how and where recycling takes place. Hopefully, not a dodgy deal with a third world country.<br>Expanding food waste recycling to flats would also be welcome.<br>The vagaries of other stakeholders (govt/corporations) presumably play a part too. | As above. | Comments noted.<br>The matters raised relate primarily to waste management operations and recycling services rather than the land-use planning matters addressed by the joint WLWP. No modifications proposed. |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | n/a - to be honest my knowledge of this complex issue doesn't allow comment on legality. | | |
| 52.1 | Veronica G Leon | | Whole Plan | Yes | Yes | Soundness: "I have. I idea if it is legally sound as not a lawyer". It would have been more useful to know what is meant by "safeguarding". Assumes it means allocated sites as yet unnamed to be kept for rubbish dumps. As does not know where these sites are, cannot comment. | | Noted. Safeguarding is defined within the Glossary on page 98 of the WLWP.<br>Safeguarding protects the existing waste uses listed in Appendix 2 of the Plan against loss or compromise by other uses. It does not allocate unnamed new rubbish dumps or grant permission for new or enlarged waste operations. |
| 54.1 | Angela Martin | | Whole Plan (page/para given as "YouTube video"; Policy: "Landfill"); landfill; consultation material | Yes | Yes | Pleased that the commitment is to not use landfill sites unless in extreme circumstances.<br>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.<br>Hopes the change doesn't mean more heavy lorries on our roads, adding to pollution plus danger to pedestrians, cyclists and other road users. Asks: "Does this plan go against the borough's aims to be greener and safer?"<br>Would appreciate a shorter report: went to download the first one, saw it was 209 pages long and watched the YouTube video instead. Unclear whether there is more than one video; more seem | Give information in shorter formats, while linking to the long reports too. | Support noted and welcomed<br><br>The issue of compensation is not a matter for the WLWP.<br><br>Comments regarding matters such as HGV movements are noted, however, no additional sites are proposed in the plan and it is not considered that policies will result in additional infrastructure requirements.<br><br>The WLWP has been tested as part of the IIA process to minimise environmental burdens.<br><br>Points regarding the need for shorter formats are noted. The potential to summarise |

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| | | | | | | to be needed to cover the last two topics on the questionnaire. Interested in hearing about the habitat assessment and any pollution impact assessments. If there had been an option to click 'I don't know', that is what she would have put in the box above. 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. | | content will be considered as part of the WLWP website.<br><br>Overall, modifications are not considered necessary to ensure the soundness of the WLWP. |
| 56.1 | Pamela Esther Mayorcas | | | No | No | 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.<br>Nowhere is the words 'plastic' or 'hard plastic' mentioned anywhere. This, is one of 'the' most prevalent materials in our daily life, one of the most difficult to recycle.<br>So far as she 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.<br>Most household cleaning equipment (brooms, buckets, cloths) are made of plastic, most cosmetics products are sold in | | Noted. The matters raised relate primarily to waste collection, recycling operations and the use of plastics, rather than the land-use planning matters addressed by the joint WLWP. No modification is proposed. |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | 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 vegetable 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? She 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 her - as an individual member of the public - | | |

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| | | | | | | nor (she ventures 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. | | |
| 58.1 | Tajinder Panesor | | Whole Plan | Yes | Yes | No comments submitted. | | Noted |
| 59.1 | Rupert Penny | | Whole Plan | Yes | Yes | To help reduce fly tipping and its associated cleanup costs, make official waste disposal quick, cheap and easy — largely funded by a proportional surcharge on new items.<br>To help reduce waste to landfill and increase transitional electricity supply and diversity, repurpose coal fired power station sites with comparatively clean (high temperature) incinerators generating electricity from non-recyclable waste.<br>To help reduce vehicle pollution and its health and climate consequences, prioritise emission reductions in transport and delivery vehicle fleets (that are on the road for most of the day on most days).<br>To potentially massively reduce pollution including 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 and landing (plus | | Noted |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | ever greater use in fuel blends in cruise). | | |
| 60.1 | Mary Helen Pius | | Whole Plan | Yes | Yes | No comments submitted. Form indicates Plan considered legally compliant and sound. | | Noted |
| 61.1 | Arjan Singh Sandhu | | Whole Plan | Yes | Yes | Legal compliance: "I believe it to be fully compliant." Wishes to participate in hearings: "*I think these will be ideal for people who do not know how to use the internet to voice their opinions*." | | Noted |
| 62.1 | Marcin Suwała | | Whole Plan – West Avenue (noise, dust and air pollution) | | | Fully understands and supports the continued development and improvement of this part of West London. I am not opposed to development — quite the opposite; regeneration can bring significant benefits to the local community.<br><br>Raises a concern regarding the increasing level of noise, dust and air pollution affecting residents along West Avenue. The section between approximately [address details removed for data protection] should receive additional protection.<br><br>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 | | Representation noted. With regard to any potential proposed new waste management facilities or capacity, policy WLWP 4 sets out a range of criteria to ensure that prospective developers consider, avoid and mitigate the impacts of their proposed development on the environment. This includes a requirement to demonstrate how adverse impacts have been avoided through the application of proposed control measures for managing emissions. |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | difficult to sleep peacefully, particularly during periods of construction and increased traffic.<br><br>As development and construction activity increase, it is important that existing residents are also protected from the additional noise, dust and environmental impact.<br><br>Modern PMMA acoustic barriers or a similar transparent noise-screening solution could help to:<br>- reduce continuous road and construction noise;<br>- provide additional protection for residents living directly alongside the road;<br>- reduce dust and airborne particles reaching residential properties;<br>- improve the overall living environment while still allowing light and visibility.<br>This would be a reasonable and constructive environmental mitigation measure and community benefit associated with the continued development of the area. | | |
| **1. Executive Summary** | | | | | | | | |
| 47.1 | Linda Rosemary Green | | Page 4, paragraph 1.3 Surface water | No | No | Re. surface water drainage in Wembley, in all documents in which it is referred to. Lives in | | Comments noted.<br>Road drain maintenance falls outside the scope of the WLWP, therefore no |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | drainage- all references | | | [Brent address removed for data protection]<br>We are at a strong risk of flooding because Brent does not maintain the drainage system.<br>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.<br>Road drains have not been maintained since the early 1990s. Council does not remove the leaves that cover up the drains. Creates problems in a heavy downpour. Roads flood and water comes up through house drains. The whole report is meaningless unless it contains a Borough commitment to clear land drains at regular intervals. This is the most important flood prevention measure that could be made. | | modification to the Plan is proposed. However, this issue will be reported to the relevant Brent Council team whose remit includes road drain maintenance. |
| **2. Introduction and Background (including comments on evidence base documents, listed at paragraph 2.17)** | | | | | | | | |
| 06.7 | Charlotte Mann | Environment Agency | Waste Management Topic Paper (evidence base, paragraph 2.17) | | | In the 'Providing for Waste From Beyond the Plan Area' section of the Topic Paper, there is no mention of contact with waste planning authorities outside of London.<br>Recommend engagement with the regional technical bodies for waste - the South East Waste Planning Advisory Group and East of England Waste Technical Advisory Body – as both areas | | Noted. The section referenced relates to waste that may come into the WLWP area, not waste that is exported.<br>Further details on engagement with WPAs hosting facilities that received waste from West London is set out in the Strategic Cooperation Statement. |

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| | | | | | | receive significant tonnages of waste from West London. | | |
| 06.8 | Charlotte Mann | Environment Agency | Strategically Significant Waste Flows report, paragraph 3.14 (evidence base, paragraph 2.17) | | | Paragraph 3.14 of the Strategically Significant Waste Flows document takes a value of over 20% i.e. a fifth of the total arising of each waste type as a threshold of significance . Believe this percentage is too high as some waste movements which haven't been highlighted in the table should be:<br>Table 5: Mixed municipal waste – Slough;<br>Table 5: Process residues – Thurrock;<br>Table 6: Inert waste;<br>Table 6: Soil and stones – Herts, Peterborough and Warwickshire.<br>Recommend that the above should be included as they are significant tonnages. | | Noted. Strategically significant movements have been screened by tonnage, waste type and receiving facility. Known closure dates and any constraints reported by host WPAs informed the monitoring and liaison actions set out in in paragraph 7.7. Further details on engagement with WPAs hosting facilities that received waste from West London is set out in the Strategic Cooperation Statement. |
| 06.9 | Charlotte Mann | Environment Agency | Assessment of Existing Waste Capacity in West London 2025, paragraph 2.4 (evidence base, paragraph 2.17) | | | Paragraph 2.4 in the Assessment of Existing Waste Capacity document: An Operator Survey was conducted to obtain capacity figures for some sites and capacities from planning permissions were used in calculating site capacities.<br>Understand that these have been used primarily instead of waste data interrogator (WDI) and other data sources. In the assessment of site capacities, believe that the WDI figure should be used primarily as this represents a 'real world' | | Noted. The WDI peak was used as the starting point and then reviewed against other data sources having regard to national planning policy. The Operator Survey was only used to verify the values obtained from the desktop data analysis; values proposed by operators were scrutinised as part of the assessment process. |

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| | | | | | | operational figure, as many sites are limited in their operational capacity to one below their planning or a theoretical operational maximum for compliance reasons.<br>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. | | |
| 38.1 | Ross Walker | Suffolk County Council (Waste Planning Authority) | Strategically Significant Waste Flows report, pages 10 and 14 – data tables (evidence base, paragraph 2.17) | Yes | Yes | 1. "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."<br>2. "We note the receipt of 'minerals – based non chlorinated engine gear and lubricating oils', we acknowledge that these levels are about [sic] the identified thresholds, however the total volumes are low and we see no reason why this waste stream could not continue to be managed." | None. | Noted and welcomed |
| **3. The Plan Context** | | | | | | | | |
| 11.1 | Emily Fitzpatrick | Heathrow Airport Limited | Chapter 3, paragraph 3.3, 3rd sentence | | No | Heathrow Airport Limited considers that chapter 3, para 3.3. needs to be clearer and state that the pressure on waste | Amend paragraph 3.3 to include "necessary land take." "It is also acknowledged, the | The modifications made following Regulation 18 sufficiently recognise the possibility of future expansion |

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| | | | | | | capacity will arise from the need for land take of existing waste sites for works forming part of Heathrow expansion. | prospect of the expansion of Heathrow Airport will place pressure on certain existing waste sites **through necessary land take."** | of Heathrow Airport. The expansion is not a certainty as no formal planning application has been approved, therefore, it is not deemed reasonable to state that the expansion is 'necessary'. This also conflicts with the emerging London Plan, which opposes future expansion. |
| 12.1 | Ries-William Lamont | Heathrow West Limited | Whole Plan; paragraph 1.8 – Heathrow expansion and the National Policy Statement; paragraph 8.52 | | No | Heathrow West Limited (HWL), part of the Arora Group, is the project company promoting 'Heathrow West', an alternative, privately-led approach to Heathrow expansion.<br>2The proposed development will be an NSIP including a 2,400m third runway, new Terminal 6, airport infrastructure, surface access improvements, river diversions, green infrastructure and associated works.<br>NPSs designated under the Planning Act 2008 provide the primary policy framework for examination and determination of DCO applications.<br>Once designated, the HENPS "will constitute the primary policy document and decision-making framework" for any DCO application for expansion at Heathrow Airport. Under section 104 the SoS must also have regard to other "important and relevant" matters; "Whilst this is likely to include the West London | State explicitly in the Plan (including any future draft version(s)/ consultation(s)) that 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. | The HENPS has not been adopted and is unlikely to be prior to the WLWP being submitted for examination. Therefore, the WLWP refers to adopted higher policy including the NPPF, London Plan and borough Local Plans.<br>The WLWP is not intended to replace the applicable National Policy Statement in that process. |

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| | | | | | | Waste Plan, the latter is not the principal policy against which a DCO application is determined."<br>The ANPS (and once designated, the HENPS) will constitute the primary policy document and decision-making framework for 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)." (Reiterated in the Conclusion.)<br>Welcomes the acknowledgement in paragraph 1.8 that the potential waste management implications of Heathrow's expansion may trigger a need for early review of the Plan, and the West London LPAs' willingness to develop policy as details of expansion materialise; HWL is willing to collaboratively engage throughout such processes.<br>Welcomes the protections afforded to the Aerodrome Safeguarding Zone for Heathrow Airport regarding the potential risks from landfilled non-inert waste at paragraph 8.52. | | |
| 17.2 | Calum Chipman | London Borough of Lambeth | Paragraphs 1.8, 3.3 and 5.46 | Yes | Yes | 1Pages 3, 13, 35; paras 1.8, 3.3, 5.46; Policy: N/A<br>The Plan notes that Heathrow Airport expansion may place pressure on existing waste sites and could necessitate an early | | Comment noted. |

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| | | | | | | review of the Plan. Lambeth supports ongoing monitoring of this issue given the potential implications for strategic waste management capacity across London. | | |
| **4. Waste Management in West London** | | | | | | | | |
| | | | | | | No specific representations received on this chapter. | | |
| **5. The Policy Context** | | | | | | | | |
| 15.5 | Tony Firkins | Hounslow Green Party | Paragraph 5.8 (landfill) | See 15.1 | See 15.1 | The plan, at Paragraph 5.8, includes landfill reduction ambitions to 2030 but does not incorporate the CCC ambition of eliminating waste to landfill by 2045. This should be included to be considered sound. | The CCC ambition to eliminate all waste to landfill by 2045 should be included in the WLWP for it to be sound. | Representation noted - Plan makes clear disposal to landfill is last resort |
| 17.3 | Calum Chipman | London Borough of Lambeth | Paragraphs 5.43–5.44 Safeguarding existing waste sites | Yes | Yes | Pages 35–36; paras 5.43–5.44, Safeguarding Existing Waste Sites<br>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. | | Comment noted.<br>Paragraphs 7.8–7.9 already address London-wide unmet needs and capacity-sharing agreements.<br>See also the response to Rep 09.8 on consideration of surplus capacity before site release. |
| | | | | | | | | |
| **6. Vision and Objectives** | | | | | | | | |

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| 04.1 | Vilna Walsh / Jack Clemance, Firstplan (agent) | Day Group Ltd | Vision; Strategic Objectives 1 and 3 | | | Supports the 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. Expressly supported and should be retained.<br><br>Supports Strategic Objective 1, which 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.<br><br>Supports Strategic Objective 3, which seeks to utilise and expand sustainable transport options for waste movement, including rail freight to reduce road miles by safeguarding railheads.<br><br>The supported parts of the Plan (see also Reps 04.2–04.4) "are integral to ensuring the WLWP is 'sound'" and are "essential to ensuring the Plan is sound particularly in the context of consistency with the NPPF and general conformity with London Plan requirements." Should any material change be made to those parts, Day Group reserve | | Noted and recognition welcomed. |

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| | | | | | | the right to comment further at subsequent stages of the WLWP review process." | | |
| 15.2 | Tony Firkins | Hounslow Green Party | Strategic Objectives (section 6.2) | | No | The strategic objectives in 6.2 do not sufficiently promote treating waste as close to West London as possible when it is managed outside the area. | | Representation noted<br>The proximity principle is addressed in Policy WLWP 3 A2 and through the sustainable transport provisions in Policy WLWP 2 C5 for additional capacity. The WLWP sets the planning framework for waste related development; it does not determine waste-management contracts. |
| 19.7 | Philip Barnes | London Parks & Gardens (London Historic Parks & Gardens Trust) | Strategic Objective 4 | | No | The policy fails the test of soundness on the grounds of not being effective.<br>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. | 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." | Noted. The Plan is to be read alongside national decision-making policies in the NPPF and the rest of the Development Plan, which includes adopted local plans i.e. relevant development plan and spatial strategies. |
| 29.1 | Vilna Walsh / Jack Clemance, Firstplan (agent) | Quattro (UK) Ltd – Southall Lane | Vision; Strategic Objective 1 | | | Supports the 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". Supports WLWP Strategic Objective 1, which "seeks to safeguard existing waste sites whilst encouraging development to improve efficiency and throughput, co-location with | | Noted and recognition welcomed. |

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| | | | | | | other waste uses and accordance with the agent of change principle".<br>The areas of support (Vision, Objective 1, WLWP 1, WLWP 2, Appendices 2 and 3) "are expressly supported and should be retained" and are considered integral to ensuring the WLWP is sound, "particularly in the context of consistency with the NPPF, NPW and general conformity with London Plan requirements". Should any material change be made to those parts, reserves the right to comment further at subsequent stages. | | |
| | Jack Clemance, Firstplan (agent) | Quattro (UK) Ltd – Horn Lane | Strategic Objective 1 | | | See also Rep No. 28.1 (Quattro – Horn Lane) under Appendix 2, site E07, which supports Strategic Objective 1. | | Noted |
| **7. Future Requirements for Waste Management Capacity (including Providing for Unmet Needs from Elsewhere within London)** | | | | | | | | |
| 01.3 | DP9 Ltd (agent) | British Land Properties Limited | Chapter 7 – surplus capacity; London-wide capacity; Capacity Assessment | See 01.2 | See 01.2 | The dWLWP identifies West London's current qualifying HIC capacity as approximately 2.60 million tpa, which (after removing the sites proposed for release) exceeds London Plan 2041 forecast arisings by 357,711 tpa (circa 16%). Removing the Site's assessed capacity (185,000 tpa) would leave a surplus of 172,711 tpa (circa 7%).<br>Discrepancy: Table 2 of the dWLWP shows a surplus of 357,711 tpa, whereas Table 4 of the BPP Capacity Assessment (July 2026) shows a HIC surplus | Explanation requested of 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. | Comment noted and acknowledged that the WLWP does identify surplus capacity.<br>Noted and acknowledged that the discrepancy in figures between different documents will need to be addressed and resolved |

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| | | | | | | of 306,744 tpa, which after removing the 6 sites proposed for release leaves 288,098 tpa; removing the Site from that figure leaves 103,098 tpa (circa 4%). Explanation is requested from the WLLPAs as to the correct surplus … and how this figure has been arrived at.<br>The WLWP boroughs are required to identify capacity for 2,221,000 tpa of HIC waste under London Plan apportionments (London Plan total 8,726,000 tpa to 2041); the dWLWP provides a significant surplus of allocated capacity.<br>Para 8.21 (no identified need for additional capacity; safeguarded capacity exceeds need, giving flexibility should apportionments increase) 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." (Also observes that Policy WLWP 2 removes the specific tonnage in adopted WLWP Policy 1 and introduces Circular Economy Hubs, suggesting a shift in safeguarded land being used for | | while noting national advice to avoid spurious precision.<br>The WLLPAs recognise that surplus capacity has been identified<br>With regard to surplus being offered to neighbouring boroughs facing a shortfall, Westminster City Council and LB Tower Hamlets are seeking to share west London capacity (see Reps 42.1–42.2), as recorded at the Regulation 18 stage. Engaging with other London boroughs on these matters links in to the need for the WLLPAs to satisfy the GLA on general conformity. |

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| | | | | | | the management of waste to converting waste for other life-cycle uses.)<br>The London Plan expects surplus to be offered to neighbouring boroughs facing a shortfall (para 9.8.6) before release; notes para 7.8 of the dWLWP on engagement with boroughs with unmet needs.<br>Table 1 (HIC apportionments and surpluses across London) shows: West London 16% surplus in 2041 (357,711 tpa; apportionment sub-total 2,211 ktpa); East London draft Reg 19 plan 2,619,508 tpa capacity after proposed release of sites, a surplus of 1,122,508 tpa (~42%); North London net self-sufficient (NLWP 2022); South East London c.1,162,982 tpa (approx. 68%) once REP fully operational; South London 13,110 tpa (1.4%) (figures based on London Plan 2021, with apportionment to 2037); Wandsworth, Hammersmith & Fulham, Lambeth and Tower Hamlets net self-sufficient; Kensington & Chelsea relies on agreements with LBHF and OPDC; Westminster has an agreement with LB Bexley. Across London there is not expected to be reason for any demand from other London boroughs for the surplus arising within West London. | | With regard to the table on pages 15-17 of the representation, the WLLPAs do not fully concur with the data set out in the table. For example, the table suggests that LB Tower Hamlets can meet its apportionment targets.<br><br>Comment noted. The WLLPAs are working together to meet London Plan HIC waste apportionments as a group. The WLLPAs further note that some surplus capacity may need to be offered to boroughs with an unmet need in line with London Plan policy. |

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| | | | | | | Whilst some surplus headroom is prudent, the current over allocation across London, which totals 2,656,311 based on the dWLWP figure, is very clearly excessive, unjustified in policy terms, and unarguably results in the sterilisation of land better placed for industrial intensification. (On the Capacity Assessment figure the London total would be 2,605,344 tpa; elsewhere described as c.2.66 million tpa, significantly in excess of what is sufficient for London to achieve net waste self-sufficiency.)<br>Even with the release of the six sites a substantial regional surplus would still exist; The logic for further release remains to comply with the need for intensification of industrial sites identified in the SDS.<br><br>Westminster and Tower Hamlets (Reg 18 requests for surplus): Tower Hamlets (not a proximate neighbour) requested a transfer of 192,370 tpa; in line with the proximity principle its demand would be more appropriately addressed in East London (1,122,508 tpa surplus), South East London (c.1,162,982 tpa) or South London (13,110 tpa). Westminster (apportionment 200,000 tpa; Bexley C&I arrangement which will soon cease) appear to be capable of | | The WLLPAs have justified the release of six sites from safeguarding on the basis of proven surplus capacity and inclusion in Local Plans which envisage redevelopment for non-waste uses.<br><br>The WLLPAs are engaged in dialogue with Westminster City and Tower Hamlets Councils about sharing surplus capacity if the necessity to share is demonstrated to meet an unmet need.<br><br>Comments noted. |

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| | | | | | | being met by other London Boroughs more proximate and with greater surplus, and 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.<br>Even if there were a strategic case for West London to provide capacity for Westminster, it would not be sound to rely on the Site, which in its current condition following the fire could not readily meet short-term needs or, for the reasons given, future needs.<br><br>Draft London Plan (Policy GLE12, Table 4.3): 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 | | The draft London Plan HIC waste arisings and apportionments are outside the WLWP's control. However, with regard to the comments made in the representation, it is important to note the difference between HIC waste apportionments and qualifying HIC waste management capacity.<br><br>Within the draft London Plan the WLLPAs have combined total HIC waste forecast arisings to 2040 of 1,740,000 |

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| | | | | | | surplus of waste capacity in the future.<br><br>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. | | tpa but have a combined total HIC waste apportionment requirement of 2,153,000 tpa. The 413,000 tpa difference is the amount of additional HIC waste the WLLPAs are expected to provide qualifying capacity to manage over and above the projected arisings. It is not the GLA's assessment of regional site capacity surplus.<br><br>Comments on draft London Plan noted. |
| 02.2 | Anne Denby | Canal & River Trust | Chapter 7 – cross-boundary waste flows; Powerday Wharf, Scrubs Lane | | | Powerday Wharf, Scrubs Lane – it is recognised that the WLWP boundary excludes the part of the OPDC area which includes Hammersmith & Fulham area.<br>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 | | Noted. The OPDC Local Plan demonstrates how OPDC is supporting LB Hammersmith and Fulham to meet its identified waste needs, including through safeguarding and supporting the optimisation of the Powerday Scrubs Lane site. The Strategic Cooperation Statement and the Strategically Significant Waste Flows report sets out more detail on our engagement with other LPAs hosting facilities accepting |

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| | | | | | | immediately on the border of the WLWP area and serves a regional West London function. In accordance with the NPPW and the London Plan, suggest that the WLWP should take account of waste arisings across neighbouring waste planning authority areas and sufficiently address cross-boundary waste flow movements. | | significant tonnages of waste from West London. |
| 05.4 | Christian Smith, GP Planning Ltd (agent) | Envar Composting Ltd | Additional capacity – land promoted through the Call for Sites (High View Farm) | No | No | 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 (quotes the IIA conclusion that, given the lack of additional capacity proposed and the lack of an identified shortfall in capacity for the apportioned waste, allocation of the additional High View Farm land "was not necessary or justified" – see also 05.5).<br>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."<br>One of the main objectives of the WLP is self-sufficiency and to avoid transporting waste further afield. The Envar site is "the | Request to include/allocate the land promoted through the Call for Sites north of New Years Green Lane (Areas 1–3 on drawing GPP-E-WLC-COU-26-06) for waste management use. | There is no need for additional capacity for the WLWP to be sound.<br>There has not been a formal planning application submitted for the site in question, as such it does not meet the necessary requirements for safeguarding in line with the WLWP.<br>The WLWP plans for 15 years and identifies no shortfall in qualifying capacity against the HIC waste apportionments. The Plan's objective is net self-sufficiency, which allows for inward and outward flows.<br>The WLLPAs are not suggesting that green waste arisings would disappear, rather that they might remain constant, nor that high-density residential growth generates no green waste; the Regulation 18 response |

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| | | | | | | 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."<br>The promotion of additional land to the north of New Years Green Lane is required to enable Envar to consolidate and co-locate all waste management operations to the north of the lane and avoid the need for vehicles to regularly cross the public highway (see 05.2, 05.3).<br>Crow's Nest Farm (response to Regulation 18 Consultation Statement p.65): whilst 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 supplies Crow's Nest Farm with compost. 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 for green-waste composting because it is significantly closer to sensitive receptors, including residential properties; section 4.1 of the | | addressed the assertion that "more homes" mean "more gardens". Predicted growth would be expected to be reflected in the London Plan HIC waste forecasts that underlie the borough apportionments, which do not distinguish between specific waste types such as green waste or management methods.<br>The representation's account of space requirements suggests that expansion would not bring additional capacity to deal with growth, as it otherwise claims.<br>It would be highly unusual for a Fire Prevention Plan to be approved by the Environment Agency if it relied on land not covered by the environmental permit; if it does not extend beyond the permitted area, the operation can be conducted in compliance with Environment Agency guidance without expanding. The reference to "retaining" hand-picking indicates it already takes place.<br>The specific challenge to the availability of green-waste composting capacity at Crow's Nest Farm has been checked via the WDI 2025 Waste Received dataset which shows the site reported receiving 5,786t of |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | EA's Biological Waste Treatment Appropriate Measures requires impacts on local sensitive receptors to be considered and fugitive emissions (odour, dust, bioaerosols) to be prevented or minimised.<br>Housing growth: while 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 must incorporate and maintain landscaping, open space, play space, trees, green roofs, SuDS and other green infrastructure, generating grass cuttings, pruning arisings and other green waste. Overall demand for local green-waste management "is therefore likely to grow rather than disappear."<br>The development plan expressly requires green space in high-density and flatted schemes: London Plan Policy G5 (Urban Greening Factor target of 0.4 for predominantly residential schemes; para 8.5.2 ongoing management and maintenance), Policy S4 (at least 10 m2 play space per child incorporating trees and/or greenery), Policy G4 (promotes the creation of publicly | | biodegradable waste from municipal parks and gardens (EWC 20 02 01) in 2025. Wood from municipal sources is generally classified under 20 01 38.<br>The WDI 2025 Waste Removed Dataset only shows 2,221t of wood waste removed, suggesting that the difference will have been converted into a product such as compost, which being a product is not reported as an output in the waste returns submitted to the Environment Agency. |

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| | | | | | | accessible green space); OPDC Local Plan (2022) Policies SP8 and EU1 (minimum 30% of developable area outside SIL as publicly accessible open space, including two new local parks of at least 2 hectares, smaller open spaces, pocket parks and green streets, with long-term management and maintenance).<br>Hillingdon Local Plan Part 2 Policy DMHB 18 requires flats to provide at least 20 to 30 m2 of private outdoor amenity space depending on bedrooms; para 5.74 requires soft landscaping including grass, shrubs and trees; Policy DMCI 4 requires major residential development to provide or enhance open space. London Plan Policy SI 7 seeks at least 65% municipal-waste recycling by 2030 and Policy SI 8 requires the equivalent of 100% of London's waste to be managed within London, safeguards existing 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."<br>Space requirements: the suggestion that the space requirements largely disappear with the IVC is incorrect. The relevant question is "what physical area the continuing | | |

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| | | | | | | open-windrow activity now needs in order to operate safely and lawfully under the current permit and current regulatory standards." EA Appropriate Measures section 4.3 requires operators to determine the actual physical capacity needed, taking account of seasonal changes, and to provide enough space for safe operation, storage and treatment.<br>Open-windrow composting is intrinsically land intensive; unlike IVC, it does not use enclosed vessels and forced aeration to accelerate the active phase: the pad must accommodate receipt and blending, shredding, active windrows, turning lanes, screening, maturation, quarantine and product storage, with safe vehicle and emergency access; longer residence time and repeated turning mean more pad area per tonne 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."<br>Space for maturation and product finishing is essential to produce stable PAS 100 compost. The EA's Compost from Waste: Resource Framework (October 2025) introduced tighter physical-contaminant controls, making | | |

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| | | | | | | picking, screening and separation increasingly important; these require dedicated equipment and safe working areas. Compost use supports Government soil-health and resource-efficiency objectives (Environmental Improvement Plan 2023).<br>Additional contained storage is necessary where seasonal or weather-related restrictions delay the use of compost on land (Appropriate Measures section 7 para 15; section 5.10; section 7 para 3 – impermeable surfacing with contained drainage), especially relevant at New Years Green Lane because of local groundwater and surface-water sensitivity and the site's legacy landfill setting.<br>Adequate space directly assists odour control: overcrowding or delayed turning increases the risk of anaerobic conditions and odour (Appropriate Measures section 4.3). Fire prevention creates further land-take: section 5.7 para 8 requires enough space between windrows for turning, cooling and safe access in the event of a fire.<br>Fire Prevention Plan: the bespoke installation permit requires an up-to-date FPP; Appropriate Measures section 5.7 applies fire and explosion prevention requirements to all processes, with paragraph 8 | | |

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| | | | | | | imposing additional measures on composting plants (sizing windrows so passive heat convection is not inhibited, monitoring temperatures, optimising moisture, space between windrows). The FPP guidance identifies "compost and plant material" as combustible waste (section 4); generic maximum pile dimensions do not apply while material is actively managed during composting but do apply to waste stored before and after active composting (section 10.3); separation distances and a quarantine area capable of holding at least 50% of the largest pile with 6 m clearance are required (sections 11.1 and 12). The site's EA-agreed FPP "therefore imposes real spatial requirements." There is no relaxation for green waste sites (lists measures: stock rotation, storage generally no longer than 3 months, temperature monitoring, quarantine areas, separation distances).<br>Compost quality: source separation and load inspection cannot eliminate physical contamination; kerbside controls are not within Envar's operational control. The site must therefore retain hand-picking and mechanical screening to meet the Compost from Waste: Resource | | |

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| | | | | | | Framework and PAS 100 (Appropriate Measures sections 4.3, 4.2 and 7). Picking and screening need dedicated, safely accessed working areas with a real land-take, segregated from vehicle routes, further reducing the net area available for windows and storage.<br>17. Appendix 4 (enclosed Regulation 18 Call for Sites submission, drawing GPP-E-WLC-COU-26-06, described first as showing "two new areas (edged red)" and then as promoting "three new areas"): Area 1 (northerly extension for green waste composting, 1.12 ha), Area 2 (easterly extension adjacent to the weighbridge for parking of vehicles/plant/machinery, 0.16 ha) and Area 3 (easterly extension for green waste composting, 0.43 ha). Justifications given: the operation is "the only working green waste composting site in the West London and Greater London area" and other sites are a long way away (longer lorry journeys, more fuel, emissions, costs), demonstrating its strategic importance in line with the proximity principle and net self-sufficiency; Hillingdon's population grew by around 12% between 2011 and 2021, "faster than the London and national average", and is now over | | |

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| | | | | | | 310,000 ("More people mean more homes, more gardens, and more green waste"); Local Authorities are expected to recycle more, and maintaining and increasing capacity at existing sites "complies with the thrust of emerging Policy WLWP 1"; updated Appropriate Measures require lower pile heights, wider gaps, stronger fire controls and more space ("more land is now needed to treat the same amount of waste safely and lawfully than in the past"); fire safety set-aside areas; tighter compost quality rules (physical contamination reduced to 0.06% by weight); without extra land "the site's real working capacity will slowly shrink"; the buffer between the woodland and the site should be maintained as per legislation in force at the time. Area 2 would enable parking of vehicles, plant and equipment adjacent to the main operations.<br>For these reasons the Plan is not sound (effective) and does not meet the tests of NPPF Policy PM15 (Examining local plans and minerals and waste plans). The form states that "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 | | |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | future growth expectations and is therefore unsound." | | |
| 08.3 | Frederick Bomford | FM Conway Ltd | Hazardous waste arisings (evidence base – 'Appendix 11, Table 5') | Yes | Yes | 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. | None stated. | Noted.<br>The WDI 2025 reports 5,401 tonnes of hazardous bituminous waste managed at permitted facilities arising from west London in 2025, as compared with 16,153 tonnes of bituminous mixtures not classed as hazardous. The variation in reported hazardous tonnage may be attributed to a tightening of classification requirements. The increase does not represent a quantum that changes the conclusions of the Hazardous Waste report, or the Plan's approach to providing for it. |
| 09.4 | Nina Miles (for the Mayor of London) | Greater London Authority | Chapter 7, paragraph 7.1; Policy WLWP 1 Part D | | | Paragraph 7.1 notes that, following Regulation 18 representations, the tonnages attributed to some sites safeguarded in Appendix 2 have been updated. These amendments are noted and welcomed.<br>It is now clearer that the approach for assessing waste handling capacity is more closely aligned with the LP2021 approach 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 | | Support is noted and welcomed. |

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| | | | | | | information to generate site specific capacity values.<br>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.<br>Note that Part D of Policy WLWP 1 is explicit that where a safeguarded 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. | | |
| 09.8 | Nina Miles (for the Mayor of London) | Greater London Authority | Chapter 7, paragraphs 7.8–7.9 (Providing for unmet needs) | | | Paragraph 7.8 states 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) acknowledges meetings with Tower Hamlets Council and Westminster City Council to explore requests to share capacity to meet their unmet needs. Appendix 1 states that | | Noted. Further detail on this matter is provided in the Strategic Cooperation Statement. Please see response under 09.3 |

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| | | | | | | three requests to share capacity were received during the Regulation 18 consultation, however no further details are provided.<br>LP2021 paragraph 9.8.6 is clear that boroughs with a surplus of waste sites should offer to share these sites with boroughs facing a shortfall in capacity before considering site release.<br>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.<br>Agreement should be reached on sharing of surplus capacity before any sites are released.<br>To make the most efficient use of the surplus capacity after London Plan apportionments have been met, the WLWP should make provision to enter into arrangements with other London boroughs regarding sharing of this surplus capacity.<br>As the waste plan has not sought compensatory waste handling | | |

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| | | | | | | 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. | | |
| 12.2 | Ries-William Lamont | Heathrow West Limited | Chapter 7; C, D & E waste forecast (evidence base); operational waste | See 12.1 | See 12.1 | 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".<br>HWL's initial review of the waste evidence base identifies two related matters: 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".<br>The Regulation 19 CD&E forecast ("Construction, | Main Modifications should be made to policies WLWP 1, WLWP 2 and WLWP 5, together with the associated supporting text, so that the draft Plan expressly recognises the circumstances arising from expansion.<br><br>A new bespoke 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.<br>= | The WLWP recognises the possibility of future expansion and notes that there may need to be a future review to respond to any formal DCO.<br>As there is not yet a formal planning application for expansion it is not considered reasonable or practical to plan for an unknown eventuality. Therefore, a bespoke policy for expansion is not deemed necessary at this juncture.<br>See also Rep 12.3 on the existing criteria-based policies. |

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| | | | | | | Demolition & Excavation Waste Arising in West London to 2041", Regulation 19, Version 2.1, July 2026) uses historic arisings as its starting point; its principal forecast assumes no growth, with an upper-range sensitivity based on GLA construction-sector employment projections as a proxy. National PPG "expressly identifies any significant planned regeneration or major infrastructure projects over the timescale of the draft Plan as a relevant consideration" when forecasting C&D waste arisings.<br>The evidence itself "rightly recognises that employment is not necessarily a reliable proxy for waste production" and that projections are subject to uncertainty. The London Waste Infrastructure Capacity Study (draft London Plan 2026 evidence base) 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." | | |

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| | | | | | | Operational waste: HAL's Resources and Waste Strategy (December 2025; relating to a separate expansion project) identifies passenger activity as the principal driver of operational waste, "reflecting associated retail, food and beverage activity and staffing"; operational waste is managed through on-airport collection, segregation and consolidation, "but also relies upon off-airport treatment infrastructure". HAL's strategy "is therefore not based on operational waste being managed wholly within the airport boundary"; seeking to increase recycling and reduce waste "does not remove the need for downstream capacity; it changes the nature and balance of the infrastructure required". HAL's 2025 Sustainability Report 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. (The source's footnote 4 cites this document as "Connecting People and Planet, Heathrow 2.0: Our Sustainability Strategy. Updated Version Published December 2024", relating to a separate Heathrow expansion project.) Increased passenger and airport activity "has the potential to increase operational | | |

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| | | | | | | 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".<br>"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". | | |
| 13.1 | Simon Marsh | Herts & Middlesex Wildlife Trust | Call for Sites Proposed Site 1, Broadwater Lake (Hillingdon) | Yes | Yes | HMWT supports the soundness of the Waste Plan in relation to the exclusion of Proposed Site 1 at Broadwater Lake, Moorhall Road in Hillingdon.<br>Tarmac proposed this allocation as a backstop in the event that the planning application for the Hillingdon Watersports Facility & | | Support noted and welcomed |

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| | | | | | | Activity Centre (HWFAC) (2382/APP/2023/2906) was unsuccessful; Hillingdon Council resolved to grant approval for this application on 21/04/26 subject to a legal agreement.<br>HMWT manages a nature reserve at Broadwater Lake, although currently HS2 works are limiting access.<br>The HWFAC application was very controversial, largely because Broadwater Lake is part of the Mid-Colne Valley SSSI. "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."<br>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. Considers the Plan legally compliant and sound; does not wish to participate in hearings. | | |
| 15.4 | Tony Firkins | Hounslow Green Party | Table 1 (waste arisings 2021–2041); | | No | The WLWP forecasts increasing waste arisings between 2021 and 2041. The sound ecological approach given the current | | Representation noted<br>Waste forecasts are based on objective assessment of the data that may evidence |

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| | | | paragraph 1.7 (capacity) | | | Climate and Ecological Emergency is to decrease waste rather than increase wastefulness.<br><br>Although the plan states there is sufficient waste management capacity in 1.7 other than landfill, there is no existing or planned zero-carbon EfW capacity available to West London. | | potential management needs, and are not intended to support increased waste generation.<br>Policy WLWP 3 discourages provision of residual-waste management capacity that might undermine recycling and Policy WLWP 6 supports waste reduction and circular economy principles. |
| 17.4 | Calum Chipman | London Borough of Lambeth | Paragraphs 7.8–7.9 Providing for unmet needs | Yes | Yes | Page 49; paras 7.8–7.9, Providing for Unmet Needs from Elsewhere within London.<br>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. | | Comment noted.<br>Capacity-sharing arrangements are being considered through ongoing engagement with other waste planning authorities, including through Statements of Common Ground where appropriate, further details of engagement is set out in the Strategic Cooperation Statement.<br>The detailed strategic framework for monitoring and reviewing waste apportionments and cross-boundary capacity sharing is also a matter for the London Plan and its monitoring.<br>Paragraph 7.9 also provides for agreements to cover a specified period, be reviewed and renegotiated, and be reported in the WLWP' Authority Monitoring Reports. |

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| 17.5 | Calum Chipman | London Borough of Lambeth | Paragraphs 7.10–7.13; Policy WLWP 1 | Yes | Yes | Page 50; paras 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. | | Comment noted.<br>The Plan safeguards all existing waste sites that are lawful under planning and includes a monitoring framework (Appendix 1 of the WLWP) through which retention and expansion of waste management capacity in west London will be monitored and reported over the Plan period in the WLWP Authority Monitoring Reports. |
| 18.1 | Jasvir Mann | London Borough of Tower Hamlets | | | | The letter is in response to the WLWP Regulation 19 Consultation and outlines LBTH's response to the proposed capacity sharing criteria shared with LBTH on 16 June in regard to meeting unmet need in Tower Hamlets.<br>Tower Hamlets is a unitary waste planning authority, meaning 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 competing land use priorities, meeting the apportionment target has been particularly challenging. AS part of the evidence base work carried out for Tower Hamlets Draft Local Plan, the borough | | Comments noted.<br>The Plan recognises that identified surplus waste management capacity may contribute towards meeting unmet needs arising elsewhere in London. The West London LPAs will continue to engage with London boroughs, including through Statements of Common Ground where appropriate, to explore opportunities for sharing waste capacity that is surplus to west London's needs across administrative boundaries. Further details of engagement is set out in the Strategic Cooperation Statement. |

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| | | | | | | identified a significant shortfall in managing its waste, including apportioned waste, on facilities within its boundaries. An approach to determine whether the borough's waste needs could be met within the borough was consulted on at Regulation 19 (2024). However, representations 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 WPAs to assist with meeting its London Plan waste apportionment.<br>At this stage of the LBTH Local Plan, LBTH has discussed options with other WPA including the East London Joint Waste Planning Group (ELJWPG) and the South East London Joint | | The requested evidence is intended to establish the unmet need and the extent of any reliance on west London capacity; it is not itself an allocation of that capacity. Any agreement would identify its duration and contribution, taking account of capacity secured from other WPAs to avoid double counting, and be monitored and reviewed as described in paragraph 7.9. |

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| | | | | | | Waste Planning Group (SELJWPG). At the time of writing, discussions are ongoing and LBTH is awaiting the outcome of the ELJWP Examination hearings, where its request for sharing of capacity was put forward to Inspectors.<br>Background: London Plan paragraph 9.8.6 expects boroughs with surplus waste management capacity to share this capacity with boroughs unable to meet their needs within their boundaries before considering releasing sites from safeguarding. The London Plan also aims for net waste self-sufficiency for London, recognising that while individual boroughs may not be able to meet their 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".<br>Waste planning is also governed by legislation: the Waste Framework Directive was incorporated into UK law via the Waste (Circular Economy) (Amendment) Regulations 2020; and 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 | | |

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| | | | | | | waste to be disposed of or recovered in one of the nearest appropriate installations.<br>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 their waste planning requirements. The submission version Draft Local Plan outlines that the 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 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.<br>Capacity and Apportionment: LBTH understand that a surplus capacity after site release has been identified by 2041 of 0.36 Mtpa (360,000tpa) for HIC waste and 0.37Mtpa (370,000tpa) for C,D & E waste. Following LBTH's Regulation 18 representation, LBTH 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 | | |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | capacity of c0.5Mtpa (500,000tpa).<br>LBTH's waste capacity shortfall is C&D 56,953 tpa; HIC 192,370 tpa. Given WLPA's surplus, LBTH are requesting a transfer of this capacity from the WLWPAs. The shortfall takes into consideration the GLA and EA representations 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).<br>Response to WLWP Criteria for capacity sharing requests: As part of ongoing discussion with the WLWPA's in regards 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<br>Response to criterion 1 [robust evidence of unmet need]: The LBTH Draft Local Plan is supported by a Waste Topic Paper (2026). Chapter 8 of the Waste Topic Paper (2026) identifies a shortfall of 56,953tpa for C&D waste and 192,370tpa for HIC waste. C&D shortfall calculated by the C&D waste arisings of 127,961tpa (Waste | | |

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| | | | | | | Study Update 2024) multiplied by 0.95 (London Plan recycling and recovery target), less 64,610tpa capacity at safeguarded sites handling C&D waste. The shortfall in HIC waste was calculated by taking the London Plan apportionment of 207,000tpa by 2041, subtracting capacity from safeguarded waste sites of 2000tpa (Northumberland Wharf Transfer Station) and subtracting capacity of 12,630tpa provided by exempt sites.<br>The capacity of Northumberland Wharf Transfer Station was removed from the borough's capacity due to GLA and EA objections on the basis that the site only has a permit for transfer activities and not processing of waste. The Draft London Plan (which currently carries very limited weight) proposes to include Waste Transfer Stations within apportionment targets, so LBTH anticipate that LBTH's identified shortfall in waste capacity may be subject to change.<br>Response to criterion 2a [capacity at existing 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. Draft LBTH Local Plan policies RW1, RW2 | | |

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| | | | | | | and RW3 encourage existing sites to maximise efficiency and/or increase capacity for waste management, and provide a framework for determining applications for new and expanded waste processing facilities.RW1 specifies existing waste sites which are safeguarded over the Plan period. Policy RW1 and, RW2, supports proposals for enhancing and maximising capacity at these sites. 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 applied to ensure non-waste proposed uses do not negatively impact the function and operation of existing and safeguarded sites. [Table of capacity of existing sites included in representation] (source: page 373 of LBTH Consolidated Local Plan 2026): Northumberland Wharf Transfer Station (Cory), RRC and transfer station, LACW/C&I maximum throughput 158,181 tonnes, waste management capacity 160,000; Towcester Road (Clifford Devlin), hazardous waste transfer station, maximum throughput 263 tonnes, was management capacity 0; Ailsa Street (site allocation; safeguarded but not currently | | |

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| | | | | | | operational, contribution based on average throughputs per hectare depending on facility and technology), transfer and treatment, C, D & E, maximum throughput n/a, waste management capacity 23,850–34,450; 455; Wick Lane J B Riney & Co Ltd (former LLDC area), transfer station, C, D & E, maximum throughput capacity 64,610 tonnes, waste management capacity 418.<br>Response to criterion 2b (all existing waste sites are being safeguarded subject to appropriate release criteria as er London Plan Policy SI8 A.2).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; LBTH 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.<br>Response to criterion 2c (whether any waste sites have been lost due to redevelopment): no waste sites have been lost to redevelopment in Tower Hamlets since the London Plan was adopted in 2021.<br>Response to criterion 2d (assessment of SIL and LSIS, | | |

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| | | | | | | non designated industrial sites and safeguarded wharves and existing waste and secondary material sites present within the WPA Plan area that maybe suitable to accommodate additional capacity as per London Plan Policy SI8 B4): Chapter 6 of the Waste Data Study (2023) assessed SIL and LIL (LSIS) sites to see if they can meet the boroughs growing need for waste capacity.The borough has two SIL sites, Empson Street (10.7ha) and Fish Island (South) (8.91ha). The Employment Land Review (2023) found extremely low vacancy rates and high rents, implying significant undersupply, and a significant shortfall of industrial land, and demand is predominantly for logistics and manufacturing; relying on this land for waste could further reduce the borough's ability to meet that demand. The London Plan significant emphasis on the need for local authorities, particularly in Inner London, to adequately protect industrial land to meet the logistics and other needs of Central London.<br>LBTH also carried out a Waste Land Availability Study (2026): 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 | | |

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| | | | | | | was not available for waste uses, or failed to respond entirely, indicating that they are not pursuing alternative uses. Only one site, Moody's Wharf (TfL), where the owner suggested it might consider a waste use, amongst other uses, on an interim basis; TfL has a long-term aspiration for residential development in line with the site allocation and is open to short-term interim leases of 4-5 years. The site is only 0.37ha, suitable for only small scale waste operations and would not be available at the end of the plan period and therefore cannot be counted towards the borough's 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.<br>Tower Hamlets has two safeguarded wharves: Orchard Wharf has an extant permission for cement and aggregates storage and is not considered available for waste facilities; Northumberland Wharf includes a waste transfer station, capacity noted under criterion 2a.<br>Response to criterion 2e (whether any planning applications that would increase waste capacity in the source WPA area have been refused and if so for what reasons): | | |

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| | | | | | | according to the Waste Data Study (2023) and Waste Data Update (2024) there have been no refused waste applications in the borough. A planning register search since 2017, and a further detailed search using locational data of all current waste sites, SIL and LSIS, found no relevant records.<br>Response to criterion 2f (demonstrating all options have been explored to identify suitable locations to accommodate additional capacity within the source WPA area): LBTH carried out a call for sites from 6 July 2022 to 19 August 2022 and no potential waste sites were submitted. The Waste Study Update (2024) searched SIL and LIL sites; and the Waste Land Availability Study (2026) was carried out . Only Moody's Wharf was identified [findings repeated as above].<br>Response to criterion 3 (existence of historic/existing significant flows of waste and the future availability of receiving capacity through unmet need).According to the Waste Data Interrogator (2024), some waste is exported from LBTH waste sites to sites in LB Brent, LB Ealing and LB Hillingdon.In total, 657 tonnes of C&D waste is exported via transfer and treatment facilities. | | |

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| | | | | | | As detailed in 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. LBTH is awaiting the ELJWP main modifications stage; has and have provided comments on proposed draft modifications, 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.<br>LBTH has also engaged with the SELJWPG given existing flows to LB Bexley via Northumberland Wharf Transfer Station. A SoCG has also been set out with that group which maintains that the group will only consider accepting capacity sharing requests once the draft London | | |

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| | | | | | | Plan apportionment targets are known and local evidence on capacity has been updated.<br>Direction of Travel: noted that as per the Draft London Plan, the proposed Tower Hamlets apportionment is 1.9%, indicating a slight reduction from the current London Plan figure of 2.4% of London's total waste to be managed in borough. The 2021 figure lists Tower Hamlet's arisings of 195,000 tonnes increasing to 207,000 tonnes by 2041.The 2024 figure lists Tower Hamlet's arisings at a lower level as 157,000 tonnes 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, LBTH anticipate changes to LBTH's identified HIC shortfall.<br><br>The Plan has identified surplus capacity for HIC waste. Whilst the Plan recognises providing for unmet needs from elsewhere in London under paragraphs 7.8 and 7.9, 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.<br>Recommends that the capacity sharing request criteria circulated to boroughs with an identified | | |

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| | | | | | | 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".<br>Conclusion: Tower Hamlets welcomes the opportunity 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 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.<br>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 | | |

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| | | | | | | objectives. Tower Hamlets would welcome ongoing discussions 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 WLWP.<br>Appendix 1: Overview of LB Tower Hamlets Draft Local Plan Evidence Base<br>Waste Data Study (July 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 tpa by 204. 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).<br>Waste Study Update (May 2024). Following Tower Hamlet's Draft Local Plan (Regulation 18), Tower Hamlets commissioned a Waste Study update (May 2024) to include a more comprehensive search for potential waste sites | | |

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| | | | | | | in the borough in order to test a scenario in which no neighbouring boroughs was able to assist Tower Hamlets in meeting its need. The search identified additional capacity at Northumberland Wharf and included On-site Segregation Facilities (OSFs) as part of the waste capacity for Tower Hamlets. OSFs were included as part of the 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 par of a borough's waste capacity is untested. GLA and EA raised concerns and the approach and was deemed to be unsound". The Waste Study Update also assessed capacity for the management of C&D waste and identified a C&D shortfall of 56,953tpa to 2041.<br>The Waste Land Availability Study (2026) was carried out by Iceni to look into whether designated industrial sites (Strategic Industrial Locations and Locally Significant Industrial Sites) could accommodate waste uses within the borough. The study found no suitable or deliverable sites within the borough boundary to hep support the borough's apportionment. A copy of the | | |

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| | | | | | | report has been submitted alongside this representation. .<br>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. The demand is predominately for logistics facilities and manufacturing, and replying 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 they 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 coming forward for waste uses, particularly since there is significant over supply directly adjacent within LB Newham, and given 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 | | |

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| | | | | | | 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. | | |
| 42.2 | Richard Cressey | Westminster City Council | Chapter 7, paragraphs 7.8–7.9; Policy WLWP 1 Part G | Yes | Yes | In August 2026 Westminster provided the WLWA with information on its unmet need, demonstrating that, unlike most other local authorities, Westminster has no strategic waste management facilities of its own and therefore lacks sufficient qualifying capacity to meet the London Plan HIC (LACW and C&I) apportionment targets, forecast C, D&E or hazardous waste arisings over the City Plan period (Appendix 1).<br>The Plan identifies surplus capacity of 357,711 tpa (after site releases). In line with London Plan policy and 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.<br>Paragraphs 7.8 and 7.9 reference the joint working already conducted and to continue, "and sets out the formal mechanism through which sharing surplus waste capacity | Retain a reference within Policy WLWP 1 to the need to ensure that surplus capacity is used to meet unmet waste needs of adjacent authorities (recommended; no policy wording proposed). | Noted. No changes to policy WLWP1 are needed to ensure the soundness of the WLWP.<br>See also response to Rep 09.8.<br>Paragraphs 7.8–7.9 already set out the WLLPAs' commitment to engage on unmet needs and the mechanism for recording, monitoring and reviewing any capacity-sharing agreement entered into. Plan led site release and capacity sharing should be considered together, rather than the identified surplus being seen as an unconditional surplus available to any requesting authority. In that context the WLLPAs are also in receipt of requests from Tower Hamlets Council and a number of representors are seeking release of specific sites on the back of the surplus too.. |

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| | | | | | | 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."<br>Notes 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.<br>However, recommends retaining a reference within the policy to the need to ensure 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.<br>All previous iterations of Westminster's City Plan have been unable to identify suitable waste sites within the borough, and the current LACW and C&I arrangement will soon cease | | |

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| | | | | | | following the end of the agreement with LB Bexley; Westminster will therefore need to seek assistance from neighbouring authorities in meeting its London Plan HIC apportionment. Would welcome the opportunity to join the partnership and work collaboratively, and looks forward to continuing discussions on cross-boundary arrangements.<br>Appendix 1 (unmet need data): HIC – London Plan apportionment 2041 200 vs WCC qualifying capacity 0, difference −200 ("c200,000 tpa" deficit in 2041); C, D&E – 2041 forecast 290 vs capacity 0, difference 290 ("c290,000 tpa" deficit), from the 2020 Vitaka Consulting Waste Data Study; hazardous – all the waste streams include some hazardous waste, and all hazardous waste arising in Westminster is exported to specialist facilities with a wide catchment area; per the EA WDI, 5,135 tonnes generated in Westminster in 2024, all sent to WPAs outside Westminster.<br>Appendix 1 (site search): the 2019 Waste Evidence Paper (updated Nov 2019) found no SILs, LSEAs, licensed waste facilities, other designated industrial areas or wharves in Westminster; 158 waste-related sites and 1,405 previously | | |

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| | | | | | | developed land sites (1,563 total) were considered, sieve analysis identified 52 potential sites, none of which meet the eligibility criteria; "the situation with Westminster has not changed since this assessment." It was concluded that, unlike other authorities, Westminster has very limited available land that can meet the eligibility criteria, and the council therefore does not have proposals to promote the release of land suitable to accommodate additional waste capacity for non-industrial uses. The London Industrial Land Supply Study (March 2023) shows the use of industrial land for waste management and recycling in Westminster stayed the same from 2001 to 2020, which "demonstrates that unlike many other boroughs, Westminster does not have suitable SILs or LSISs for waste management and recycling."<br>Appendix 2 attaches Westminster's Regulation 18 response (4 February 2026): supported the vision, strategic objectives and Policy WLWP 2; noted London Plan requires surplus capacity to assist other boroughs before release; in 2024/25 c.133,000 t residual municipal waste went to SELCHP, 5,900 t (mainly bulky) processed to RDF, and c.42,568 t dry recycling and organic waste | | |

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| | | | | | | went to facilities in Essex, Southwark, Southampton, Kent and Hertfordshire; London Plan apportionment by 2041 will be 200,000 tpa; "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"; all previous local plans unable to identify suitable sites "and it is highly unlikely that any future sites will be identified"; LACW/C&I arrangement with Bexley to cease, "however the strategies for CD&E and other waste streams will remain"; wished to join the partnership to positively plan for this unmet need, "with a view to support the partnership in identifying surplus sites that could potentially be released". | | |
| 46.1 | Jacob Gilkes | | Page 49, paragraph 7.8 | Yes | Yes | Page 49, paragraph 7.8<br>Residents of Hampton Wick 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.<br>The Kingston Household Reuse and Recycling Centre is much closer, and so in connection with arrangements to share capacity | | Comments noted. Household Reuse and Recycling Centre provision and access arrangements fall outside the scope of the WLWP. No modification is proposed. |

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| | | | | | | 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 | | |
| **8. Proposed Policies – Policy WLWP 1: Safeguarding and Optimising the Waste Site Network** | | | | | | | | |
| 01.4 | DP9 Ltd (agent) | British Land Properties Limited | Policy WLWP 1 Part H (railheads) – Hannah Close sidings | See 01.2 | See 01.2 | Part H has been updated since Regulation 18 to distinguish that, whilst safeguarding of the associated railhead/wharf for waste transport will cease, the safeguarding of its capacity for other uses may continue to apply.<br>The Site is not identified in the dWLWP as having an associated safeguarded railhead, but it incorporates existing (disused) rail sidings along its northern boundary, remnants of a historical freight corridor connected to the Chiltern Main Line; addressed for completeness.<br>WSP Railway Sidings Feasibility Technical Note (November 2025, Appendix B, prepared for the OPA) concludes: the sidings remain physically connected to the Chiltern Main Line and offer some potential space for freight use, but the 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 (the letter adds that the sidings have never been | The draft policy's failure to consider feasibility is an omission that should be addressed). | Representation noted.<br>The Plan does not assume all railheads are suitable for waste use; any potential use would be subject to site-specific feasibility and operational considerations. While Clause (H) does tie safeguarding of railheads in waste use with the associated safeguarded waste site it is intentionally flexible and allows for its release where the existing waste use ceases to be safeguarded. |

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| | | | | | | used in connection with a waste use).<br>WSP: although some timetable capacity exists, the lack of reserved freight paths, and the complexity and cost of securing new ones, is a significant barrier to reactivation; in its current condition the site cannot support even basic operational flexibility without significant investment; reversing or turning freight would pose a risk of disruption and a serious safety and operational risk; the layout (smaller size, track configuration, no loop lines or dual access) is not suitable for manoeuvring or reversing freight.<br>WSP: the financial burden of reinstating the sidings is substantial (rough cost of £975,000 for roughly 1,300m of track and two sets of points – the same WSP paragraph also refers to the single set of points on site – plus handling facilities, track access charges and maintenance), making reuse potentially financially unviable in the absence of a clear and sustained freight demand; 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, and removal is the more pragmatic option. | | |

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| | | | | | | WSP key findings also record that the main line immediately outside the site is roughly 53% utilised, so that if it were required a freight service could be introduced to the timetable, and turning freight outside the site is not a significantly restraining factor (analysis limited to the immediate network); the infrastructure remains moderately intact, offering potential for reactivation or repurposing subject to necessary upgrades, and the area has a history of freight use and could support future operations if demand arises.<br>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.<br>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 sidings, their presence does not weigh in any way in favour of continuing to safeguard the Site for waste uses. | | |
| 04.2 | Vilna Walsh / Jack Clemance, Firstplan (agent) | Day Group Ltd | Policy WLWP 1 Part H; paragraph 8.17 | | No | Considers 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 | Policy WLWP 1 Part (H) to read: "H. Railheads and wharves associated with a safeguarded waste site will be safeguarded for waste transportation use where | A modification could be considered to Clause H of WLWP 1 to delete 'capacity for' and refer to waste 'transportation', so that the policy safeguards railheads |

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| | | | | | | critically that it is not consistent with national policy nor in conformity with the adopted London Plan, in particular in the approach taken to safeguarding of railhead sites.<br>Policy WLWP 1 (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).Paragraph 8.17 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.<br><br>The approach to railheads at Part (H) (formerly Part (I) at Regulation 18 stage), largely repeated at paragraph 8.17 (quoted), is objected due to lack of clarity and ambiguity three points of objection are raised (items 18–22 below).<br><br>The Transport Avenue site is not solely a 'waste' site and the railhead also facilitates the import of aggregate; for this reason the site is proposed to be safeguarded for its sustainable transport of minerals function (as required by the NPPF and | 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." (Tracked in the source: deletes "capacity for waste transportation" and "it"; changes "wharf" to "wharves" and "transport" to "transportation"; inserts "transportation" before "use", "rail related or safeguarded" and ", with any other rail related safeguarding remaining in place".)<br><br>Paragraph 8.17 to read: "Railhead and wharves associated with a safeguarded waste site are also safeguarded for wase [sic] 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, | and wharves for waste use without referring to an undetermined capacity. This adds clarity, as the capacity associated with waste transportation depends on many factors, including train movements.<br>A modification could be considered to add reference to "other existing or planned rail-related or safeguarded uses" to Clause H of WLWP 1, to clarify that other rail safeguarding may remain in place even if safeguarding for waste ceases.<br>See also Reps 24.1 and 24.2. |

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| | | | | | | London Plan) in the emerging Hounslow Local Plan which has now reached an advanced stage.<br><br>Rail served sites are a scarce resource, with available sites increasingly under threat by competing forms of development either on or in close proximity to these facilities; their importance in supporting the construction industry in London sustainably, by reducing long distance HGV miles, is key.<br><br>The efficient movement of freight is critical to support London and local growth ambitions; anticipated construction will create unprecedented additional demands for inward movement of construction materials and for management, exportation and recycling of waste materials; the environmental and economic benefits of rail over road are clear and compelling and underpin the need for sites such as Day Transport Avenue to be appropriately and robustly safeguarded in the WLWP.<br>Cites Network Rail's London Rail Freight Strategy (2021), which confirms that a substantial portion of the city's waste is removed by rail and that a chief challenge is "maintaining sufficient rail-connected terminals across the city and | the safeguarding of the associated railhead or wharf specifically for waste transportation will also cease. Safeguarding 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." (Tracked in the source: deletes "capacity for waste transportation", "while" and "of capacity"; changes "wharf" to "wharves"; inserts "rail related or other safeguarded", "specifically" and the "for example …" clause.)<br><br>The WLWP "should retain and appropriately reference the safeguarding for the Day Transport Avenue site and ensure this is appropriately reflected in policy."<br><br>Limit on request (Objection Point 2): the modifications are detailed "On the basis of what it is assumed is meant by the Policy and supporting text"; "If this is not the intent then this should be clarified and Day Group reserve the right to comment further on any | |

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| | | | | | | securing capacity on the rail network for trains to reach them."<br>Cites DfT 'The Future of Freight' (June 2022), paragraph 2.6: "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"; the sector must achieve net zero by 2050. In December 2023 the government set a target to grow rail freight by at least 75% in freight moved by 2050, which "reaffirms the position that rail infrastructure comprises vital infrastructure and capacity will be required to grow". The Railways Bill (introduced 5 November 2025; report stage and third reading completed 10 June 2026; now at House of Lords committee stage, Royal Assent targeted by the end of 2026) will create Great British Railways, tasked amongst other things with driving forwards the rail freight sector.<br>The need for rail freight sites such as Day Transport Avenue is "distinct and separate to those for general industrial land"; such sites "are extremely difficult to replace" owing to lack of sites with rail access, prohibitive construction costs, high land costs and competition from higher value uses. "Hence the | response or revised wording in this respect." | |

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| | | | | | | imperative to retain and safeguard such facilities."<br>NPPF (2024): cites paragraph 20(b) (strategic policies to make sufficient provision for infrastructure for transport, waste management and minerals) and paragraph 223(e) (quoted: safeguard existing, planned and potential sites for bulk transport, handling and processing of minerals etc.). The reference "even to 'potential sites'" shows the importance of safeguarding for bulk transport (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."<br>NPPF (2024) also cited: paragraph 85 (conditions in which businesses can invest, expand and adapt); paragraph 86(c) (identifying locations for uses including freight and logistics); paragraph 87(c) (locational requirements, including storage and distribution operations); paragraph 7 (sustainable development including "supporting infrastructure in a sustainable manner", listed "in the same breath as the 'provision of homes'", which "must inherently include the sustainable transport of materials such as by rail"); paragraph 200 (agent of change, quoted); paragraphs 16(a) and | | |

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| | | | | | | 16(d) (plans to contribute to sustainable development; policies "clearly written and unambiguous").<br>Cites PPG Paragraph 006 (Reference ID: 27-006-20140306): storage, handling and transport sites are safeguarded to ensure they are available should they be needed and to prevent sensitive or inappropriate development that would conflict with their use; and NPPW paragraph 5 (quoted: capacity of transport infrastructure to support sustainable movement of waste, "seeking when practicable and beneficial to use modes other than road transport").<br>NPPF 2026 (published 17 August 2026): the WLWP is being prepared under the legacy plan-making system and falls within the transitional provision, so its soundness "should therefore be assessed against the Framework as published in December 2024." The NPPF 2026 decision-making policies apply from 17 August 2026 and "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"; NPPF 2026 "(albeit not relevant to examination of this plan) nonetheless notably maintains | | |

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| | | | | | | the same approach to Rail infrastructure safeguarding as the NPPF 2024."<br>London Plan: "expressly requires the safeguarding of sites such as the Day Transport Avenue site", in particular under Policies SI8 (Part A – safeguard and optimise existing sites; Part E(5) – consider use of rail; paragraph 9.8.19 – "priority should be given to facilities for movement by river or rail") and T7 (Part A – facilitate sustainable freight by rail, waterways and road; Part D – "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"; Part J; paragraph 10.7.1). Also cites agent of change: paragraphs 3.13.1, 3.13.2 and 3.13.6 (applies to "industrial sites, waste sites, safeguarded wharves, rail and other transport infrastructure"), Policy D13 (quoted) and Policy D14.<br>Other policy cited: Mayor's Transport Strategy (2018) – rail and water particularly important for heavy goods, "with about 40% of construction materials being brought into London by rail"; the London Plan will safeguard railheads (page 81). Adopted Hounslow Local Plan (2015) – site within the SIL, | | |

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| | | | | | | Brentford Preferred Industrial Location; Policies ED2 and EQ5 and paragraph 9.11 (noise). Draft London Plan (July 2026) – "At this stage it carries limited weight" but indicates direction of travel: Policies MBUL1 Part B(5), MBUL5 Parts B(5) and B(6)(ii) ("protecting the operation, functionality and quality of existing rail and water freight facilities"), Annex D Table D2 ("Rail and water freight infrastructure (such as intermodal facilities, nodal yards, railheads, wharves and piers)") and GLE12(C)(2) and (3). Emerging Hounslow Local Plan (submitted 23 June 2025, hearings completed): site identified on the Policies Map as a 'Safeguarded Minerals Railhead and Associated Minerals Operation'; Policy EQ10 Part D (per EX70, June 2026); new supporting paragraph 9.29 "agreed as a Main Modification between Day Group and LBH" (quoted); updated schedule of modifications issued 21 September 2026, to be consulted on in due course. Policy conclusion: safeguarding of waste and rail sites "is not achieved merely by retaining the land on which they are located for that use"; it must work in a twofold manner – identify and reserve safeguarded sites, and ensure surrounding development | | |

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| | | | | | | does not prejudice their use, in accordance with the Agent of Change principle. 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."<br><br>Objection Point 1: 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'." If it refers to capacity to transport waste, including capacity for train movements, Day questions "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."<br><br>Objection Point 1 (cont.): rail capacity depends on many factors, including available train paths (subject to regular timetable changes), available freight trains and wagon numbers/sizes, and the ability of receptor sites to accept the waste. "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)." Rail | | |

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| | | | | | | sites can also be safeguarded for non-waste purposes, specifically 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."<br><br>Objection Point 1 (cont.): the WLWPA response in the Regulation 18 Consultation Statement (May 2026) stated that Part (I) "is not intended to quantify rail capacity … The policy does not address safeguarding of rail freight or mineral infrastructure", and, in response to Day Group's suggestion to remove 'Capacity for waste transportation', stated "Change Proposed – policy wording amended as suggested". The change has not been applied in the Regulation 19 version; "It is assumed … that this is an oversight/omission error." Either way the wording "is redundant and should clearly be removed" from Policy WLWP 1 and paragraph 8.17.<br><br>Objection Point 2: the qualification 'where such use does not conflict with other existing or planned uses' is "unclear and ambiguous", undermines soundness and its lack of clarity "is directly contrary to NPPF requirements." Day | | |

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| | | | | | | Group assumes it means that safeguarding for waste transportation should not conflict with other existing or planned uses of the rail or wharf infrastructure for sustainable transfer of freight – e.g. at Transport Avenue, existing/planned transportation of minerals by rail (for which the site is also safeguarded) and 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."<br><br>Objection Point 3: the second sentence of Part (H) (quoted) "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"; "the WLWP is not in a position to do that particularly in the context of safeguarding requirements deriving from the NPPF and London Plan." Acknowledges that the remit of the WLWP and of Policy WLWP 1 "only extends as far as waste functions", and that some clarification has been made (the words 'for waste transport'), but the issue remains. Whilst addressed "to | | |

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| | | | | | | some extent" in paragraph 8.17 and Part (H), the WLWP "is considered not to meet the tests of soundness as currently drafted."<br><br>Not 'Justified': safeguarding 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 the most appropriate strategy; the Consultation Statement "appears to indicate agreement that a change was needed", which further supports this conclusion.<br><br>Not 'Effective': Part (H) gives rise to a situation where the safeguarding of the transport infrastructure identified could be undermined; the reference to 'capacity' is not clear and is ambiguous in terms of how it is to be applied rendering this part of the policy ineffective.<br><br>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 not consistent with NPPF paragraphs 16(a) and 223(e); it is not consistent with paragraph | | |

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| | | | | | | 16(d) (clearly written and unambiguous policies); and lack of a clear policy on railheads and wharves is not consistent with paragraphs 85, 86(c) and "87 (e)" (storage and distribution operations in suitably accessible locations).<br><br>Not 'Positively Prepared': taking the issues in the round, in particular those showing the Plan would not be effective; This is in large part based on the need to appropriately apply rail safeguarding requirements notwithstanding that this is a Waste Plan.<br><br>Safeguarded rail freight sites such as Day Transport Avenue are key to transferring as much material (including waste) as possible from road to rail. 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 increased HGV road miles and emissions. Such sites are a scarce resource and once lost are lost forever.<br><br>Given the safeguarding issues raised, it is considered essential that the operator of the Day Transport Avenue site "have the opportunity to fully address | | |

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| | | | | | | matters of 'soundness' they have raised at the Oral Hearings." Some Regulation 18 issues generated a response of 'Change Proposed' that "does not appear to have translated through to Regulation 19 stage and is potentially simply an omission"; Day Group would be keen to engage early with the WLWA to review the required modifications ahead of the submission of the WLWP. | | |
| 06.3 | Charlotte Mann | Environment Agency | Paragraph 8.8 (definition of existing waste sites – ancillary uses) | | | Paragraph 8.8 from the Plan is quoted. Recommend that the final bullet (where the waste use is ancillary to a wider lawful use) is made clearer.<br>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. | | Noted. The WLWP definition of a waste site is based on established land use planning principles. The term 'ancillary' has a recognised meaning in land use planning law when it relates to uses that take place on a specific area of land. Sites where the waste use is ancillary to a wider lawful use and there is evidence of waste throughput are therefore counted towards capacity. |
| 06.4 | Charlotte Mann | Environment Agency | Paragraph 8.17 (railheads and wharves) | | | Paragraph 8.17 from the Plan is quoted.<br>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 | | Noted. Railheads and wharf used for waste transportation associated with<br>a safeguarded waste site will be safeguarded for waste use where this does not conflict with other existing or planned uses. If the existing |

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| | | | | | | that can be used for waste transport and/ or close to the strategic road network'. | | waste site ceases to be safeguarded for waste use, then the safeguarding of the railhead or wharf for waste transport would also cease. The WLWP is not intending to limit or preclude the future use of a railhead or wharf that forms part of the permitted waste use once that use ceases. This is clarified in paragraph 8.17. |
| 09.5 | Nina Miles (for the Mayor of London) | Greater London Authority | Policy WLWP 1 Part G (Regulation 18 draft) | | | At Regulation 18 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. | | Support is noted and welcomed. |
| 09.6 | Nina Miles (for the Mayor of London) | Greater London Authority | Policy WLWP 1 Part F; paragraph 8.19 | | | Part F takes the assessed capacity of the existing site in Appendix 2 as the starting point for determining the replacement capacity required (consistent with Part D), but this approach differs from the approach 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. | | Noted. WLWP Part F sets outs that the replacement capacity requirement will be determined, with assessed capacity of the existing site being the starting point, but in certain instances other factors would be considered including the reported throughput based on the WDI. This is to help protect capacity that has been identified and ensure decisions take into account relevant factors. We will continue to engage with the GLA as we progress towards examination, including |

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| | | | | | | 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.<br>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. | | exploring the potential for a Statement of Common Ground where appropriate. |
| 09.7 | Nina Miles (for the Mayor of London) | Greater London Authority | Policy WLWP 1 Part B; paragraphs 8.8–8.9 | See 09.1 | See 09.1 | There are discrepancies between the LP2021 and draft WLWP definitions of a waste site. LP2021 paragraph 9.9.1 defines a waste site as land with planning permission for a waste use or a permit from the Environment Agency for a waste use. Part B of Policy WLWP 1 defines waste sites as those subject to planning consent or | | Noted. The response to comments on the Regulation 18 Plan and paragraphs 8.8 and 8.9 of the Regulation 19 WLWP set out the rationale for the WLWP definition being based on established land use planning principles. |

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| | | | | | | CLEUDs for a waste use, or deemed lawful in planning terms.<br>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.<br>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. | | |
| 11.2 | Emily Fitzpatrick | Heathrow Airport Limited | Policy WLWP 1 (removal of Regulation 18 Part G) | | No | HAL had supported the previous Part G wording (quoted in full in the letter – see modification), which allows for safeguarded sites to be released for non-waste uses.<br>WLWP Table 2 shows surplus capacity of apportioned HIC waste of 0.5 Mtpa (24%) over the baseline and 0.35 Mtpa (16%) over the 2041 forecast demand; for CDEW, paragraph 7.3 confirms a surplus of 0.37 Mtpa (17%) by 2041 against forecasts.<br>Removal of Part G 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 | "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."<br>Previous Part G wording, as quoted by HAL: "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 | Noted. Part G was removed in response to the GLA's Regulation 18 representation, which objected to its inclusion (see Rep 09.5).<br>The new London Plan may clarify London's position on net self-sufficiency, which would provide a clear measure of whether capacity is surplus. Without this, it would be difficult to apply Part G as worded on a consistent basis. |

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| | | | | | | surplus capacity. "This approach is not justified given the existing surplus."<br>This is inconsistent with National Planning Policy for Waste (NPPW, 2014) paragraph 3 (Local Plans to identify sufficient opportunities to meet identified needs, including considering the extent to which the capacity of existing operational facilities would satisfy any identified need) and paragraph 8 (non-waste development: impact on existing facilities acceptable, not prejudicing the waste hierarchy and/or efficient operation).<br>The policy is unsound: 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).<br>Summary: removal of 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 Plan demonstrates surplus capacity against forecasts; the text must be included "by allowing applications to demonstrate | 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." | |

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| | | | | | | acceptable impacts on waste capacity." | | |
| 12.3 | Ries-William Lamont | Heathrow West Limited | Policies WLWP 1, WLWP 2 and WLWP 5 (or a new policy) | See 12.1 | See 12.1 | "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" to account for the particular waste management requirements of Heathrow expansion "as they become better defined".<br>Paragraph 1.8 is helpful, "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".<br>Main Modifications should be made to Policies WLWP 1, WLWP 2 and WLWP 5 and supporting text so that the Plan "expressly recognises the circumstances arising from Heathrow expansion". Alternatively, a bespoke new policy should be considered, "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". | "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."<br>"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 | See Reps 12.1 and 12.2. Policy WLWP 2 Clause A1 supports a demonstrated specific need, Clause B2 addresses temporary C, D & E facilities on major development sites, and Clause C3 permits other suitable locations consistent with the relevant development plan.<br>Policy WLWP 5 also requires a demonstrated need and application of the waste hierarchy.<br>Loss or reconfiguration of safeguarded capacity would be considered under Policy WLWP 1; a general airport-specific exemption is not justified while the project's requirements remain undefined. |

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| | | | | | | 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", allowing the amount, location and timing of any replacement capacity to be determined through a project-specific assessment "taking into account broader planning considerations".<br>Policy WLWP 2 should expressly recognise that additional capacity may be required to facilitate the construction or operation of an expanded Heathrow Airport, provide a clear route for such capacity "where a project-specific need is demonstrated", and allow normal locational preferences to be applied flexibly where the functional or locational requirements of 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."<br>Policy WLWP 5 and supporting text should make clear that a demonstrated project-specific requirement may establish the need for recovery or disposal | account broader planning considerations."<br>"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."<br>"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". | |

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| | | | | | | 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."<br>Main Modifications (including consideration of a new bespoke policy), "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". (Reiterated in the Conclusion.)<br>These matters should be addressed through the Examination; HWL wishes to retain the opportunity to be invited to participate in relevant hearing sessions, reserves its position to provide further technical evidence as the proposals develop, "subject to the Inspector's directions", and asks to be kept informed of further consultations. | "This should be supported by an effective monitoring and early-review mechanism."<br>Limit placed by the respondent: "HWL is not seeking the allocation of additional waste management sites at this stage." | |
| 16.1 | Matt Mehegan, Waste Planning & Permitting Ltd (agent) | L&B Holdings Limited | Policy WLWP 1, including Part F; Plan as a whole | No | No | The WLWP needs amendment: it must be drafted to include policies in it which are capable of genuinely responding to change. | Amend the WLWP to include policies capable of genuinely responding to | Factual changes could, where appropriate, be captured through annual monitoring and reported |

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| | | | (responsiveness to change) | | | Such as in cases where the plan is factually wrong (as in L&B's case).<br>The planning authority, when applying policies in the plan, should actually respond comprehensively and properly, including 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.<br>L&B wrote to the Head of Planning & Development Services, on 25/09/2025 explaining the site boundary was incorrect and asking for assistance. The reply from the Principal Planning Policy officer, dated 2 October 2025 said the only route for correction of the boundary was through the development plan adoption process. Various issues of complaint fall from this, including as to whether the previous plan was actually sound, and whether this new plan is sound – since it assumes the previous plan was sound.<br>The replies received appear disinterested in genuinely resolving the queries put in front of them, putting the onus on the landowner and insisting L&B can only seek change through a process the date for which was | change, such as where the plan is factually wrong.<br><br>With regard to the 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. | through the WLLPA Authority Monitoring Report.<br><br>Further comments noted and relayed to wider Brent Planning team. |

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| | | | | | | not advised to L&B. Business isn't here just to serve the councils' planning function but to play its part in economic, environmental and social progress (employment, innovation, appropriate use, re-use and repurposing of land). The safeguarding designation has stifled interest in the site, imposing direct economic impact on L&B and denying opportunity to others; This is in nobody's best interests.<br>Cites the Plan's own wording on sufficiency: the Chapter 8 Policy Purpose "… so that sufficient … capacity is provided for the Plan period…), para 8.4 (purpose of safeguarding is to ensure sufficient capacity is maintained) and para 8.5 (London Plan allows site release without replacement capacity where 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).<br>Policy WLWP 1(F) allows deliberation of factors including wider market conditions, but because of the way it is drafted such evaluation cannot be undertaken unless a planning application (for redevelopment) is under consideration. Prospective developers therefore | | |

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| | | | | | | have little alternative than to go to the expense of a planning application; developers tend to be averted by the risk of planning failure, so very few would likely take such a risk. The policy as drafted inhibits innovation, economic growth, social progress etc.<br>Development plan policy needs to strike a better balance between provision of sufficient (but not more than 'sufficient') waste capacity and developer access to land that 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 capacity would still be available after the loss of a site, the balance should weigh in favour of release 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). | | |
| 18.2 | Jasvir Mann | London Borough of Tower Hamlets | Policy WLWP 1 | | | Tower Hamlets supports the scope and objectives of the policies 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 | | Comments noted.<br>See response to Reps 09.6 and 09.7 for the compensatory-capacity approach and waste-site definition, and response to Reps 18.1 and 42.2 for capacity sharing. Clause C ties safeguarding to the duration of a temporary consent; see response to |

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| | | | | | | is for the plan to be examined as a plan under the legacy system.<br>Policy WLWP 1 demonstrates consistency with national policy in particular part A2 of London Plan Policy SI8 which requires existing waste sites to be safeguarded, and aligns with the approach taken in the LBTH Draft Plan which supports development of waste uses on existing sites.<br>To ensure the plan is aligned with national policy and positively prepared in relation to capacity sharing, including 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.<br>LTBTH recommend that the capacity sharing request criteria | | Rep 29.2 where that consent is extended.<br>As set out in the Strategic Cooperation Statement, the WLWPAs are engaging with boroughs who have identified a shortfall in capacity to explore opportunities to share surplus capacity where it is justified. The WLWPAs are engaging in dialogue with Westminster City and Tower Hamlets Councils about sharing surplus capacity if the necessity to share is demonstrated to meet an unmet need. |

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| | | | | | | 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.<br>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. [LBTH included a table setting out the draft plan wording and LBTH response. A summary of the points made are included below].<br>Paragraph 8.5 requires rewording to align with London Plan paragraph 9.9.3 and avoid misinterpretation. It must be made clearer that sites ***can*** be released only if capacity 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.<br>Paragraph 8.6 should reference London Plan paragraph 9.9.2, | | Paragraph 8.6 summarises the approach set out in the London Plan while paragraph 8.7 sets out the justification for the approach of the WLWP with regard to the five year peak recorded input.<br>The supporting evidence provides explanation for the approach taken to assessing capacity (on a site-by-site basis) and to defining existing waste sites.<br>The second bullet of Paragraph 8.13 states that a lower throughput for management further up the hierarchy may be acceptable. It is considered that this may be justifiable in certain specific instances, recognising the benefits to the strategic objectives of sustainable waste |

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| | | | | | | 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.<br>Paragraph 8.8 refers to the London Plan definition of waste sites but does not directly reference the relevant paragraph (9.9.1). It 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.<br>Paragraph 8.9: justification should be provided for excluding sites only subject to an Environmental Agency permit for waste uses from the definition of waste sites. This is inconsistent with London Plan paragraph 9.9.1. Recommends 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.<br>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).<br>Paragraph 8.13: London Plan Policy SI9 (Part C) clearly states that compensatory capacity | | management and the circular economy made by facilities operating at higher levels of the waste hierarchy.<br><br>Part F seeks to protect identified waste management capacity while ensuring that decisions are informed by site-specific circumstances and other relevant evidence where appropriate. |

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| | | | | | | "***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 capacity is at a higher level of the waste hierarchy, as suggested in the second bullet of Paragraph 8.13.<br>Paragraph 8.18: the final sentence should clearly state which definition of waste site is referred to (either the London Plan definition or the alternative WLWP definition proposed in the draft WLWP, subject to this being appropriately justified).<br>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.<br>Part C : 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.<br>Part D 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 | | |

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| | | | | | | 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.<br>Part F: London Plan paragraph 9.9.2 is clear that release of safeguarded 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. | | |
| 19.5 | Philip Barnes | London Parks & Gardens (London Historic Parks & Gardens Trust) | Policy WLWP 1 (new clause) | | No | The policy fails the test of soundness on the grounds of not being justified. | 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." | Noted. The boundaries reflect lawful extent of waste uses on sites. |
| 19.6 | Philip Barnes | London Parks & Gardens (London Historic Parks & Gardens Trust) | Policy WLWP 1 Part I (Agent of Change) | | No | 1. The policy fails the test of soundness on the grounds of not being effective. | 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 | Noted. The Plan is to be read alongside national decision-making policies in the NPPF and the rest of the Development Plan, which includes adopted local plans i.e. relevant development plan and spatial strategies. |

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| | | | | | | | adjoining a safeguarded site. | |
| 21.1 | Fisher German LLP (agent) | National Grid Electricity Transmission | Policy WLWP 1; Appendix 2 sites HI15 and HO07 | | No | One or more proposed site allocations or designations are crossed by or in close proximity to NGET assets: Safeguarded Waste Site HI15 – Skip Lane, Harvill Road (ZC route (TWR 116A–142): 275kV overhead transmission line, Iver–Watford South 1 and Iver–Watford South 2); Safeguarded Waste Site HO07 – Brentford Aggregate Materials Recycling Facility (underground cable tunnel: Ealing–Laleham). Plans attached are illustrative only (Figures 1 and 2 show the interactions).<br>NGET advocates the high standards of design and sustainable development promoted through national policy and understands that the contemporary planning and urban design agenda requires a creative approach to new development around high voltage overhead lines and other NGET assets.<br>NGET's Regulation 18 response (02 February 2026) said the Council should remain cognisant of NGET infrastructure within and adjacent to HI15 and HO07, "particularly in circumstances where development of the sites is required to facilitate their use as waste sites"; it acknowledged "the extent of any development is | Insert in Policy WLWP 1 (NGET quotes Part D in plain italics – "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." – and shows only new Part E in red italics as its proposed addition) the following wording "or wording to the same effect": "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." | Noted. The requirement is very specific and would affect only two safeguarded existing waste sites. Overall, proposed modifications are not considered necessary to ensure the overall soundness of the WLWP. |

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| | | | | | | likely to be minimal, given the nature of the use", but the Council should ensure future development does not impact negatively on the safe operation and maintenance of the infrastructure.<br>Following 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." The Plan should contain appropriate wording which accounts for the presence of NGET assets associated with these sites.<br>NGET considers the wording below is required for the plan to be fully effective, with Policy WLWP 1 as the appropriate overarching policy.<br>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. | | |

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| 24.1 | Craig Hatton | Network Rail Infrastructure Limited | Policy WLWP 1 Part H (Railheads and wharves) | | No | Part H of policy WLWP1 states) 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.'<br>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.<br>This approach is:<br>- Not justified: safeguarding 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.<br>- Not effective: the reference to 'capacity' of rail sites being | Modify Part H as follows: 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]. | Noted. Part H refers to safeguarding of the railhead or wharf 'for waste transport', so its cessation would not remove safeguarding for any other purpose. This position is further clarified through paragraph 8.17. It is accepted that the scope of 'other uses' could be defined further through the supporting text. See response to 24.2.<br>The separate objection to the reference to "capacity" is addressed by the proposed clarification at Rep 04.2. That clarification could be applied to Part H and paragraph 8.17, while retaining safeguarding for waste transportation and distinguishing other rail-related safeguarding. |

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| | | | | | | safeguarded is not clear and is ambiguous in terms of how it is to be applied.<br>- Not compliant with national policy: the NPPF requires Plans to 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)).<br>In addition with regard to the final sentence of Part H ('In the event that the existing waste site ceases to be safeguarded … will also cease'): the intent 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.<br>The changes (to Part H and paragraph 8.17) 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. | | |
| 24.2 | Craig Hatton | Network Rail Infrastructure Limited | Paragraph 8.17 | | No | For consistency, paragraph 8.17 should be amended alongside the proposed modification to Part H. | Insert additional text at the end of paragraph 8.17 as follows: | Noted. See also response to 24.1. The cessation of safeguarding for waste transport would not remove |

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| | | | | | | Paragraph 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'. | 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. | safeguarding for any other purpose. It is accepted that the scope of 'other uses' could be defined further through the supporting text.<br>See also Rep 04.2 on removing the reference to "capacity for" from the policy and supporting text, while clarifying that other rail-related safeguarding remains in place. |
| 29.2 | Vilna Walsh / Jack Clemance, Firstplan (agent) | Quattro (UK) Ltd – Southall Lane | Policy WLWP 1 Parts C and E (and footnote 30) | | No | Overall policy approach of WLWP 1 is supported in terms of achieving its intended approach of protecting, enhancing and optimising existing waste sites (Support in Part / Object in Part).<br>Supports in particular the additional wording/clarification in Part (E) on opportunities to co-locate waste uses together with complementary activities, with the addition of Footnote 30 (Such as activities that make use of the outputs of associated waste management operations). | Part (C) of Policy WLWP 1 should be clarified by the addition of a footnote: [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.<br>Alternatively, the same objective could be achieved by the suggested footnote text being | Noted. Not considered necessary: the definition of safeguarded waste sites includes sites granted planning permission, so if the temporary permission were to be extended or permanent permission granted the site would continue to be safeguarded and reported as such through the WLLPA Authority Monitoring Report. |

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| | | | | | | Objects to Part (C) (quoted: sites subject to time limited consents will only be safeguarded as far as the date at which the consent permitting the waste use expires), in that it too requires further clarification.<br>Background – Quattro Waste Site (HO2): operated under planning permission 01032/E/P48 (18 January 2018, as amended by 01032/E/P48/NMA, 2 February 2022) for a waste recycling facility and concrete batching plant. Critically this is a time limited permission: Condition 1 requires the use to cease and buildings/plant to be removed on or before 21 December 2027 (reason: permanent use would prejudice the 2015 WLWP proposal for Municipal Waste use). The WLWA consultee response was No objections provided site can be made available for Municipal Waste Use by the WLWA if required.<br>Background – history: it was agreed by Hounslow and the WLWA that the site could be occupied by Quattro until required for its apportioned waste use; the operation was considered acceptable partly because, whilst not an 'apportioned' waste use, it did comprise a waste use and a co-located CBP using recycled material. Quattro came to the | provided as part of the supporting / explanatory text to Policy WLWP 1. | |

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| | | | | | | site after being forced to vacate Lionel Road South, Brentford (TW8 0JA) as a result of the Brentford Football Club stadium CPO; a permanent relocation to this site could not be provided given its safeguarding for apportioned waste use. The lease (originally three years to January 2021) was extended by another 6 years to December 2027.<br>Background – relocation: Quattro continue to experience difficulties securing a permanent relocation site and it is becoming increasingly urgent that a solution is found. LB Hounslow Property (freeholder) has indicated, at this stage and in broad terms, that it supports Quattro as a tenant over the long term; does not currently identify any urgent need for other waste uses at the Waste Site (HO02), albeit it cannot rule out that the site may be needed by the Council at some point in the future; and would support relocation to the Quarry Site with a further temporary lease at the Waste Site to allow transition – a period of five years initially suggested (i.e. to December 2032).<br>A pre-application advice request has been made to Hounslow Planning on a further temporary period for the existing C&D recycling and CBP at the Waste | | |

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| | | | | | | Site; advice is still to be provided, but subject to this it is likely a planning application will follow. Either way it is fully envisaged that at minimum some limited additional temporary period of operation beyond December 2027 will be required, and it should be assumed that at minimum an application will be forthcoming in the short-term for a further temporary period.<br>Footnote 51 to Appendix 1 of the BPP Consulting Assessment of Existing Waste Capacity report (July 2026) states for HO2: Site subject to temporary planning permission expiring in 2027 so site is only proposed to be safeguarded through updated WLWP to that date.<br>It can only be assumed that Part (C) should be read on the basis that if a temporary permission is extended the safeguarding would similarly be extended; clearly, if permanent permission were granted the site would fall to be safeguarded under Part (B). It must be good planning practice, and the 'sound' approach, that the WLWP be clear that 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. | | |

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| | | | | | | Raised at Regulation 18; the WLWPA responses (Consultation Statement, May 2026, pages 25 and 41) proposed no change (quoted: matter already addressed through Part (B); WLWP1 Clause C is generic to time-limited … In the event of permanent permission being granted then the site would revert to being safeguarded solely under Clause B of WLWP 1). There is nothing to suggest anything other than continued safeguarding if a temporary permission is extended, but the issue remains that this is not expressly stated either in the Policy itself by way of a footnote or in supporting text; a modification is warranted and required to support the overall objective of safeguarding such sites and to ensure the Plan is sound.<br>The intent is to be absolutely clear that the Southall Lane 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); any suggestion that safeguarded status could be lost would mean the site would not benefit from the protective provisions which Policy WLWP 1 Part (I) imparts in terms of | | |

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| | | | | | | neighbouring development. The existing Waste Site maintains its position as unallocated land within the emerging Hounslow Local Plan, however it is proposed for continued site specific waste site safeguarding [in] the emerging WLWP for a temporary basis in line with its extant planning permission.<br>Policy context cited: NPPF (2024) para 200 (agent of change; existing businesses should not have unreasonable restrictions placed on them), para 85 (conditions in which businesses can invest, expand and adapt), paras 16(a) and 16(d); NPPW para 4 (co-locate waste management facilities together and with complementary activities); London Plan Policy SI8(A) (existing waste sites should be safeguarded and capacity optimised), Policy D13 Agent of Change and paras 3.13.1, 3.13.2 and 3.13.6 (applies to waste sites). A new NPPF was published on 17 August 2026; the WLWP is being prepared under the legacy plan-making system and falls within the transitional provision, so its soundness should be assessed against the December 2024 Framework. The NPPF 2026 decision-making policies apply from 17 August 2026 and are a material consideration; the | | |

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| | | | | | | safeguarding matters raised are considered to be reinforced by the immediate decision-making policies of the NPPF 2026.<br>Not justified: not clarifying how safeguarding of sites subject to a time limited consent applies is not an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. Not effective: the lack of clarity and ambiguity points to the conclusion that the Plan would not be effective in this respect. Not consistent with national policy and not in 'Conformity with the London Plan' (heading 4.16(iii)): NPPF paras 16(a) and 16(d); similarly the lack of a clear and unambiguous policy on sites subject to time limited consents is not consistent with para 85.<br>The Submission WLWP continues to propose a free standing allocation for the Quattro Site (HO02); as at Regulation 18 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 (para 2.23). | | |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| 35.2 | Laura Waters | Spelthorne Borough Council | Policy WLWP 1; paragraph 1.8 – Heathrow expansion monitoring and review | See 35.1 | See 35.1 | 1. "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." | 1. "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." | Noted<br>Paragraph 1.8 recognises that Heathrow expansion may trigger an early review. Project-specific waste and capacity implications would need to be assessed as part of the project as proposals become sufficiently defined; to do so now would be premature see Reps 12.2 and 12.3. |
| 37.2 | Emma Smyth | SUEZ Recycling and Recovery UK Ltd | Policy WLWP 1 Parts H and I; Strategic Objective 1; Policy WLWP 2 | | | 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, considers that incompatible neighbouring or planned development should not prejudice the continued operation or reasonable future utilisation of waste-related rail infrastructure.<br><br>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. Particularly welcomes the recognition that the development of housing and other development with sensitive users | | Representation noted and support welcomed. |

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| | | | | | | should not constrain a safeguarded site's "current and future operation or capacity".<br><br>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. | | |
| 44.1 | Adham Aloka | | Policy WLWP 1 | Yes | No | The 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). (General statement introducing Reps 44.1–44.3.)<br>Unjustified spatial inequality: the programme rigidly safeguards the existing network of waste sites without providing an equitable framework for the future.<br>By locking in historical industrial categorisations, the plan forces traditionally industrialised and | Introduce a "Spatial Redistribution Mandate": 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."<br>(Respondent states that the modifications "must be integrated prior to submission".) | Noted<br>Policy WLWP 2 A3 supports reuse, repair, remanufacturing and circular economy hubs, with paragraph 8.60 recognising a network of local facilities. Allocating a site in every borough irrespective of need or suitability is not justified by the capacity evidence. Safeguarding does not grant permission for additional operations; and were such proposals to come forward they would be subject to the environmental and cumulative-effects criteria in Policies WLWP 2 and WLWP 4. |

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| | | | | | | lower-income wards to perpetually shoulder the severe externalities of waste management — HGV traffic, noise, and air pollution — through to 2041. Wealthier, non-industrial boroughs are effectively permitted to export their waste footprint.<br>An evidence base that permanently centralises environmental degradation in specific neighbourhoods while ignoring the necessity for equitable burden-sharing is fundamentally unjustified.<br>The proposed modification would ensure 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. | | |
| 49.2 | Victoria Hollertz | | Policy WLWP 1 (Powerday site, NW10) | No | No | Would like to ask that the Plan consider, over the plan period, whether sites such as Powerday remain appropriately located. The 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 | Please see 49.1. | Noted. Powerday Wharf, Scrubs Lane is within Hammersmith & Fulham (LBHF) part of the OPDC area. This area is not covered by the WLWP. Instead, the adopted OPDC Local Plan sets out the policies that apply to the Powerday site. The OPDC Local Plan safeguards the Powerday site in order to help ensure LBHF can meet |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | 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.<br><br>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 own decision about whether to [Location/address removed for data protection].<br><br>Do not believe residents should be placed in a position where ongoing quality of life [Location/address removed for data protection] depends on voluntary improvement rather than enforceable policy.<br>In the meantime, and for as long as the site remains, conditions regarding pest control, monitoring and enforcement should apply. | | its waste needs. Please see Reps. 49.1 and 49.3. |
| | Jack Clemance, Firstplan (agent) | Quattro (UK) Ltd – Horn Lane | Policy WLWP 1 | | | See also Rep No. 28.1 (Quattro – Horn Lane) under Appendix 2, site E07, which supports Policy WLWP 1. | | Support noted |

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| | | | Policy WLWP 1 | | | See also Rep No. 19.18 (London Parks & Gardens) under Appendix 2 – safeguarding of sites following regularisation. | | |
| **8. Proposed Policies – Policy WLWP 2: Provision of Additional Waste Management Capacity** | | | | | | | | |
| 04.3 | Vilna Walsh / Jack Clemance, Firstplan (agent) | Day Group Ltd | Policies WLWP 2 Part (5) and WLWP 4 | | | Policy WLWP 2 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.<br>Policy WLWP 4 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. | | Noted and recognition welcomed. |
| 06.5 | Charlotte Mann | Environment Agency | Policy WLWP 2, Emerging Capacity Needs, Part 3 (Hazardous Waste) | | | Part 3 of WLWP3 supports proposals for additional hazardous waste management capacity where they meet an identified need within west London or London as a whole and contribute towards a network providing safe and sustainable treatment across London.<br>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. | | Noted. The wording in WLWP2 makes hazardous waste an exception to the principle of providing for west London's waste in west London first and foremost. Extending it to facilities serving a catchment beyond London goes beyond the scope of the WLWP. |
| 18.3 | Jasvir Mann | London Borough of Tower Hamlets | Policy WLWP 2 | | | To note, Policy WLWP 2 is missing from the list of contents for the Plan. | | Comments noted.<br>A modification could be considered to correct this |

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| | | | | | | 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. | | unintended omission in the contents list. |
| 19.2 | Philip Barnes | London Parks & Gardens (London Historic Parks & Gardens Trust) | Policy WLWP 2 Part C(6); paragraph 8.29 | | No | The policy fails the test of soundness on the grounds of not being effective. | Our objection to Policy WLWP 2(C)(6) could be resolved by:<br>- inserting the following three matters after "the environment or local amenity", and add them to the list of impacts in paragraph 8.29.<br>Add to the impacts to be avoided:<br>- 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;<br>- harm to landscape and townscape character; and<br>- loss of or harm to open space." | Noted. The Plan is to be read alongside national decision-making policies in the NPPF and the rest of the Development Plan, which includes adopted local plans i.e. relevant development plan and spatial strategies that expressly address the impacts of concern. |
| 29.3 | Vilna Walsh / Jack Clemance, Firstplan (agent) | Quattro (UK) Ltd – Southall Lane | Policy WLWP 2 Parts B and C | | | Supports Policy WLWP 2 particularly in relation to the in principle support for C, D & E waste uses at Part (B).<br><br>Supports the 'Locational Criteria' under Part (C) (quoted: supported in principle where | | Noted and recognition welcomed. |

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| | | | | | | located within industrial areas or 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"), with particular regard to that including areas designated as LSIS.<br>Context – Quattro Quarry Site (Land South of Western International Market, UB2 5XJ; 14.3 ha; leased from Hounslow Council): operated under planning permission 01032/E/P50 (3 April 2024) for sand and gravel extraction, importation of recycling and secondary aggregate and an aggregate processing plant, with progressive restoration to agricultural land; extraction anticipated to take circa 15 years. Not identified in the Adopted WLWP; Green Belt, Safeguarded Minerals Site, Advert Special Control Area and Archaeological Priority Area in the adopted Hounslow Local Plan (2015).<br>Context – emerging Hounslow Local Plan (submitted 23 June 2025; hearings concluded; main modifications consultation to follow; adoption not expected until at least the end of 2026): proposes release of the Quarry Site from the Green Belt and | | |

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| | | | | | | designation as LSIS with Site Allocation 77 ('Minerals Extraction followed by Industrial (B2/B8)'; 34,760 sqm industrial floorspace, phasing 2030-2041). Understood that no objection has been made to this; it now carries some weight and "at this stage, it is reasonably expected to be carried through to Adoption". Draft Policy ED2 encourages industrial uses (London Plan Policy E4, which includes waste management) in LSIS.<br><br>Removal of the Quarry Site from the Green Belt and replacement with a LSIS designation and industrial allocation "in particular identifies potential for future waste (amongst other) uses to be located here". One key option being considered is relocation of the Waste Site operation to the Quarry Site; work is progressing on a Pre-App for relocation of some or all of the existing activities, having regard to progress of the emerging Hounslow Local Plan. | | |
| 37.3 | Emma Smyth | SUEZ Recycling and Recovery UK Ltd | Paragraph 8.21; Policy WLWP 2 | | | Whilst the WLWP concludes there is enough overall waste management capacity to meet demand during the plan period, this does not necessarily mean there is sufficient capacity for specific waste streams, particularly food waste, of which volumes are increasing due to the introduction of mandatory | 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, | Noted. Clause A1 of Policy WLWP 2 is considered sufficiently clear to address this concern.<br>Paragraph 8.25 also expressly recognises specific needs, including a facility that is not currently separately manage d; a HIC waste |

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| | | | | | | separate food waste collections under Simpler Recycling requirements. The WLWP area currently has food waste being sent to an anaerobic digestion (AD) facility in Mitcham, South London. Therefore, the WLWP's assessment of overall waste capacity should not be used to constrain the provision of specialist capacity needed for particular waste streams.<br><br>SUEZ strongly supports Policy WLWP 2, which allows new facilities where they address a specific need or move waste higher up the waste hierarchy and is particularly important in supporting the development of future AD capacity. AD is 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. | with reference to WLWP 2. (No wording proposed.) | management capacity surplus therefore does not, by itself, rule out a demonstrated need for specialist capacity such as that which may be need for the management of food waste for example. |
| | | | Policy WLWP 2 | | | See also Rep No. 14.1 (Historic England) under Policy WLWP 4, which also seeks changes to Policy WLWP 2. | | |
| **8. Proposed Policies – Policy WLWP 3: Residual Waste Management & Energy Recovery** | | | | | | | | |
| 06.6 | Charlotte Mann | Environment Agency | Policy WLWP 3 Parts A.2 and A.3 | | | Part A.2 of WLWP3 - 'the proposals are in accordance with the proximity principle' : recommend the inclusion of sustainable transport solutions in its definition to mirror the sending | | Noted. With regards to Part A.2, there is a distinction between planning for future provision, which is the purpose of the WLWP, and current contract |

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| | | | | | | of waste by West London Waste Disposal Authority by rail to Avonmouth.<br>Part A.3 of WLWP3 - '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. | | arrangements that sits outside of this process. The WLWP safeguards the key sites where waste is received and processed into RDF before export by rail for energy recovery in South Gloucestershire.<br>With regards to Part A.3, any application would need to be justified by need, and unless the long-term contract had ceased the tonnage could not be counted. |
| 15.1 | Tony Firkins | Hounslow Green Party | Paragraphs 8.35–8.37; Policy WLWP 3 (energy from waste); Figure 7 | | No | The plan is unsound as it does not properly address greenhouse gas emissions from energy from waste / incineration.<br>Clause 8.37 references the Sixth Carbon Budget and should reference the more recent Seventh Carbon Budget (2025).<br>The plan accepts a minimum EfW electricity performance of 400 $gCO_2$/kWh, which is viewed as too carbon intensive and the WLWP should be progressively lower carbon intensity requirements for EfW facilities over time.<br>Table 7.8.1 of the Seventh Carbon Budget anticipates all EfW facilities will have carbon capture and storage (CCS) by 2050.The WLWP is not clear how it has located EfW plants that will achieve a net-zero carbon | Clause 8.37 should reference the Seventh Carbon Budget (February 2025) rather than the Sixth. | Noted<br>The request to update the Carbon Budget reference will be considered as a factual supporting-text modification.<br>Policy WLWP 3 B already guards against recycling being undermined or residual waste being locked in; Clause E2 requires minimisation of non-biogenic carbon emissions and incorporation of carbon capture mechanisms into facility design.<br>The WLWP has no influence over how contracts for the management of waste from west London are arranged or awarded. |

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| | | | | | | emissions from this waste by 2050<br><br>National carbon budgets include a target for 22% of EfW capacity to have CCS by 2030. The plan contains no mechanism to ensure West London's waste is sent to facilities contributing to this target.<br>Approximately 500,000 tonnes of non-inert waste from West London was sent to EfW in 2023. The plan should contain targets for reducing the amount of waste sent to EfW as recycling and waste prevention improve. | | |
| 15.3 | Tony Firkins | Hounslow Green Party | Plan generally (climate change); Climate Change Topic Paper | | No | While the WLWP Climate Change Topic Paper discusses some concerns, the actual waste plan does not adequately address climate change impacts of the plan and is thus unsound.<br><br>Even the CCC's recommendations may be insufficient to meet the Paris Agreement temperature goals. Consequently, the WLWP should adopt even more ambitious climate and waste reduction measures. | None stated. | Noted<br>See Rep 15.1.<br>Policy WLWP 3 includes carbon and recycling safeguards for capacity managing residual waste, while Policy WLWP 6 requires proposals for waste related development to demonstrate their contribution to a low-carbon circular economy. |
| 37.4 | Emma Smyth | SUEZ Recycling and Recovery UK Ltd | Policy WLWP 3 | | | It is noted that the AD of food waste is considered separately from energy-from-waste facilities covered by Policy WLWP 3 which relates to the treatment of residual waste, whereas AD processes food waste and is | None stated. | Noted and agreed. |

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| | | | | | | categorised as recycling capacity under the London Plan, replicated at paragraph 5.37 of the WLWP. | | |
| 44.2 | Adham Aloka | | Policy WLWP 3 | Yes | No | Ineffective decarbonisation and the incineration loophole: the plan fails to align with stringent regional and national net-zero targets.<br>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.<br>This renders the broader environmental and circular economy objectives ineffective and internally contradictory.<br>4. The proposed modification resolves the internal contradiction with Policy WLWP 6, ensures consistency with national net-zero policy, and forces operators to pivot towards high-value material recovery rather than relying on high-emission disposal. | Implement strict carbon-intensity caps: "Insert a definitive moratorium on the approval of any new mass-burn incineration facilities."<br>"Introduce a phased, quantifiable reduction target for existing energy-from-waste reliance by 2041, tied strictly to local air quality monitoring data."<br>(Respondent states that the modifications "must be integrated prior to submission".) | Noted<br>Policy WLWP 3 A–C requires proposals to demonstrate that unavoidable residual waste, a need for the lifetime of the facility, and no undermining of recycling or lock-in of residual waste. Part E addresses carbon emissions and energy efficiency. These safeguards address the concern directly; the representation does not provide an evidence basis for the proposed blanket moratorium or a particular reduction trajectory. |
| 53.2 | Reza Maleki | | Policy WLWP 3 – energy from waste | | | 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 | None stated. | Representation noted. The WLWP supports the application of the waste hierarchy, seeking to ensure that waste is managed as high up the hierarchy as possible. In support of the |

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| | | | | | | pollution. Incorporating such priorities will make the plan sounder, more sustainable and aligned with climate action goals. | | hierarchy a key objective is to reduce the production of residual waste, by ensuring that all reasonable steps have been taken to reduce, reuse or recycle this material in the first instance.<br>Policy WLWP 3 provides a framework for assessing proposals for energy from waste involving residual waste. This policy sets strict criteria to minimise the amount of residual waste targeted by development proposals. This criteria also seeks to ensure that energy recovery is maximised. |
| | | | Policy WLWP 3 | | | See Rep No. 35.5 (Spelthorne BC) under Policy WLWP 4, which also relates to Policy WLWP 3. | | |
| **8. Proposed Policies – Policy WLWP 4: Ensuring High Quality and Resilient Waste Facilities** | | | | | | | | |
| 03.1 | Rosie Brake | Colne Valley Regional Park Trust | Policy WLWP 4; paragraph 8.48 (page 73) | Yes | No | Policy WLWP 4 is not sound "by reason of being not Effective."<br>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) (quotes Clause B(3): "deliver a lasting and positive contribution to local communities, the economy and to the protection and enhancement of the environment"). For development | Add a footnote 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."*), reading: "*Development within LB Hillingdon should refer to the Colne and Crane Valleys Green Infrastructure Strategy (and any supporting / successor | Disagree that the policy is ineffective. The west London boroughs will expect DM officers to refer to local guidance and policies when assessing applications.<br>. |

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| | | | | | | 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.<br>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.<br>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." | documents) Green Infrastructure Strategy - Colne and Crane Valleys - Colne Valley Regional Park" (the final words being a hyperlink to colnevalleypark.org.uk/project/green-infrastructure-strategy-colne-and-crane-valleys/). | |
| 10.2 | Husain Akhtar | Harrow Monitoring Group | Policy WLWP 4; Strategic Objectives; Policies WLWP 1, 2 and 6 | | No | 1. Representation relates to the Plan as a whole insofar as it addresses consultation, equality, environmental protection, site safeguarding, implementation and monitoring; more specifically to the strategic objectives, Policies WLWP1, WLWP2, WLWP4 and WLWP6, the schedule of safeguarded sites, the IIA and the monitoring and implementation framework.<br>2. Not seeking that waste facilities should never be safeguarded in Harrow; a Plan | 1. 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. | Noted<br><br>The WLWP has been tested as part of the IIA process to minimise environmental burdens.<br><br>The need for transport assessment for new waste facilities and the other matters raised in the representation, will be considered on a case by case basis through the |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | 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." A sound plan "must be more than technically comprehensive" and must provide a sufficiently clear and effective framework for the decisions that follow.<br>3. Environmental justice: Harrow is not socially uniform; the Council's deprivation evidence shows substantial geographical inequalities (Wealdstone historically Harrow's most deprived ward, with Roxbourne, Greenhill and Marlborough also among the most deprived). Necessary infrastructure should not result in communities already experiencing disadvantage carrying a disproportionate share of environmental burdens.<br>4. First, the Plan does not give sufficient prominence to environmental justice. The IIA is valuable, but equality and environmental disadvantage should be operational considerations within the planning policies themselves; a strategic plan should ask whether a development's location or expansion "adds | 2. 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.<br>3. The Plan should expressly require cumulative impact assessment where waste development may interact with other significant existing or planned development or environmental pressures (assessed alongside existing waste operations, background traffic, planned housing and commercial development, air-quality conditions and other significant sources of noise or emissions).<br>4. The supporting text should require particular consideration of sensitive receptors, including residential areas, schools and early-years provision, | development management process when applications come forward.<br><br>Overall, modifications are not considered necessary to ensure the soundness of the WLWP |

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| | | | | | | materially to burdens already borne by disadvantaged communities", not merely whether it produces an acceptable impact in isolation.<br>5. Second, treatment of transport impacts should be strengthened. Waste facilities can generate substantial HGV 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", and the relevant geography includes the roads connecting the facility to the strategic road network and the homes, schools, shops, parks, community facilities and pedestrians along those routes. A site may be operationally suitable while its routes 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."<br>6. Third, greater attention should be given to sensitive receptors – schools, nurseries, homes, care facilities, parks, walking and cycling routes and other community facilities – when assessing new or intensified waste uses. | health and care facilities, parks and community facilities. | |

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| | | | | | | 7. Fourth, the Plan needs a stronger approach to cumulative impact: assessments too often examine proposals separately, whereas the relevant question for a resident is the total environmental burden where they live. 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."<br>8. The modifications sought "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." | | |
| 14.1 | Greer Dewdney | Historic England (GLAAS) | Policies WLWP 2 and WLWP 4 | | | Response relates solely to archaeological issues.<br>The plan makes little reference to either the historic environment in general, or archaeology specifically.<br>The impact of development on heritage assets of all kinds is a material planning consideration to be handled in accordance with relevant NPPF and London Plan policies.<br>The IIA draws attention to this weakness at paragraph 3.40: "Although there is a high level of protection afforded historic sites | | Noted. Changes were made in the response to comments on the Regulation 18 Plan.<br>This matter is also considered to be covered by the NPPF and the Development Plan as a whole; and managed through local validation requirements where appropriate. Therefore, additional modifications are not considered necessary. |

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| | | | | | | 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.<br>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 and the setting of nearby heritage assets.<br>Across Greater London, local plans and decisions affecting archaeology are informed by Archaeological Priority Areas (APA) based on the Greater London Historic Environment Record. This system is endorsed by London Plan Policy HC1 and its supporting text and borough local plans.<br>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 | | |

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| | | | | | | appropriate archaeological assessment and, where appropriate, mitigation. | | |
| 19.1 | Philip Barnes | London Parks & Gardens (London Historic Parks & Gardens Trust) | Policy WLWP 4 Part B(3)(i) | | No | The policy fails the test of soundness on the grounds of not being effective and with not being consistent with national policy. | Our objection to Policy WLWP 4(B)(3)(i) could be resolved by<br>- 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."<br>- 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." | Comments noted. The Plan is to be read alongside national decision-making policies in the NPPF and the rest of the Development Plan, which includes adopted local plans i.e. relevant development plan and spatial strategies. A modification to Policy WLWP 4 could be considered to add a general reference to the natural and historic environment to link with Para 8.42 (see Rep No. 23.1). |
| 19.3 | Philip Barnes | London Parks & Gardens (London Historic Parks & Gardens Trust) | Paragraph 8.48 | No | No | The policy fails the test of soundness on the grounds of not being consistent with national policy.<br>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 | 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 | Noted. The Plan is to be read alongside national decision-making policies in the NPPF and the rest of the Development Plan, which includes adopted local plans i.e. relevant development plan and spatial strategies. |

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| | | | | | | whose list of asset types omits registered parks and gardens, although the Plan's own glossary includes them. | balanced judgement for non-designated assets.<br>Add registered parks and gardens to the list of asset types. | |
| 23.1 | Katy Wiseman | National Trust | Policy WLWP 4 criterion 3 (page 74) | Yes | No | The conservation of the natural and historic environment is of fundamental importance to the National Trust. Osterley House (Grade I listed, list entry 1080308) and Osterley Park (Grade II* Registered Park and Garden, list entry 1000287) are significant heritage assets in Hounslow Borough within 1km of existing waste sites HO07, HO14 and HO05.<br><br>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.<br><br>Welcomes the purpose of Policy WLWP 4, which seeks to deliver waste management facilities to the highest standards of environmental protection, and is pleased that paragraph 8.42 refers to heritage assets, archaeology and the historic | Criterion 3 to read: "*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…*" | A modification to Policy WLWP 4 Criterion 3 could be considered to add a general reference to the natural and historic environment to link with Para 8.42.<br><br>See also Rep 19.1. |

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| | | | | | | environment.<br><br>But the 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.<br><br>The suggested change would ensure Policy WLWP 4 of the Waste Plan is consistent with policy objectives set out within Chapters 19 and 20 of the NPPF. | | |
| 35.5 | Laura Waters | Spelthorne Borough Council | Policies WLWP 3 and WLWP 4 – environmental protection, climate adaptation and green infrastructure | See 35.1 | See 35.1 | "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."<br>"Particular regard should be given to the River Colne corridor, the Colne Valley area, and designated ecological sites identified through the Habitats Regulations Assessment." | "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." | Noted and welcome support.<br>Policy WLWP 2 C6 expressly addresses cumulative effects. Paragraph 8.48 identifies biodiversity, green infrastructure and flood risk among the matters addressed with the wider development plan. The specific River Colne, Colne Valley and ecological connectivity points are noted in that context. |
| 37.5 | Emma Smyth | SUEZ Recycling and Recovery UK Ltd | Policy WLWP 4 (environmental standards); footnote | n/s* | n/s* | Supports the principle in WLWP4 that waste management facilities should achieve high environmental standards. However, we consider that the term "highest practicable environmental standards" lacks | 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 | Noted. No alternative wording is proposed.<br>Footnote reference to the NPPF: noted although the Plan has been produced under NPPF 2024. |

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| | | | | | | sufficient clarity as currently drafted.<br>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. Further clarification is needed to ensure that WLWP 4 provides a clear and deliverable basis for decision-making, having regard to the test of soundness in 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. | Policy PM15 of the NPPF (no wording proposed).<br>Update the footnote to Policy WLWP 4 to reference the NPPF 2026. | |
| 37.6 | Emma Smyth | SUEZ Recycling and Recovery UK Ltd | Paragraph 8.44 | | | SUEZ welcomes and supports the recognition that there may be circumstances where enclosure is not a practicable option and | | Noted, recognition welcomed |

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| | | | | | | supports the identification of other mitigation measures which could be appropriate as per paragraph 8.44. | | |
| 40.1 | Maria Kenworthy | Transport for London (officer comments) | Supporting text (transport); development / release and redevelopment of safeguarded sites near LU and railway infrastructure | | | Comments represent the views of TfL officers, made on a "without prejudice" basis, and should not be taken to indicate any subsequent Mayoral decision; provided alongside the views of the GLA.<br><br>TfL fully support achieving logistical efficiency in waste management facilities in West London through a sound, sustainable waste plan, as it will result in more efficient waste collection, easing pressures on TfL's and local councils' highway network and more broadly complying with London Plan policies.<br><br>Having considered the changes made between the Regulation 18 and regulation 19 plan, TfL wishes to reiterate the following points raised at Regulation 18, which reman applicable and have not been addressed:<br>The WLWP 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, nor to TfL's | Encourages the inclusion of reference to the following in the supporting text: –Direct Vision Lorries, FORS (or similar) and TfL's Vision Zero Action Plan. | Representation noted. Whilst not considered necessary for soundness, consideration could be given to whether a modification would be helpful to specify through the supporting text additional procedural requirements should work be proposed to a safeguarded site in the vicinity of LU assets / rail infrastructure.<br>The separate request to reference Direct Vision Lorries, FORS (or equivalent) and Vision Zero will also be considered as a modification alongside paragraph 8.47. This could explain their relevance to safe waste transport without creating a separate accreditation requirement through the WLWP. |

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| | | | | | | Vision Zero Action Plan. It is requested that such schemes / initiatives are referenced in the supporting text of the plan.<br>TfL wishes to raise the following infrastructure protection comment in relation to the proposed release and redevelopment of safeguarded waste sites:<br>- London Underground Infrastructure Protection needs to be consulted when the safeguarded waste site is developed in the vicinity of LU assets, to ensure the development does not impact on existing LU transport infrastructure, in accordance with London Plan 2021 Policy T3 and Sustainable Transport Walking and Cycling LPG 2022.<br>- 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; | | |

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| | | | | | | 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, developed jointly between TfL and the developer on a site-specific basis. | | |
| 49.1 | Victoria Hollertz | | Policy WLWP1; Policy WLWP 4 (pages 71–75); paragraph 8.29 | No | No | [Location/address removed for data protection] wish to comment on Policy WLWP 4 and WLWP 1 as they relate to [Powerday] site.<br><br>Over the years [Location/address removed for data protection] air quality and odour from the site appear to have improved and understand some nearby illegal waste operations have since been closed, which is welcomed.<br>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, believes this is very likely linked to on-site waste storage and processing, though have not seen this formally investigated.<br><br>Would like the Plan to ensure that:<br>1. Policy WLWP 4 explicitly requires pest | Note that a complaints route already nominally exists: residents can contact the OPDC which has planning authority over this part of the site. However, 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. | Noted. Powerday Wharf, Scrubs Lane is within Hammersmith & Fulham (LBHF) part of the OPDC area. This area is not covered by the WLWP. Instead, the adopted OPDC Local Plan sets out the policies that apply to the Powerday site. The OPDC Local Plan safeguards the Powerday site in order to help ensure LBHF can meet its waste needs. There are a range of policies in the OPDC Local Plan to ensure any new development does not cause unacceptable harm to amenity, including D5, EU4, EU5 and EU6. OPDC is the local planning authority but is not responsible for issuing environmental permits for waste sites or regulating waste management sites; these responsibilities are undertaken by the Environment Agency. |

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| | | | | | | management (not just odour and dust control) as a condition of continued operation for safeguarded sites handling putrescible or mixed waste<br>2. Ongoing monitoring and enforcement mechanisms so residents can report and have investigated amenity impacts such as pest infestations, with a clear route for complaints to be acted on<br>3. Continued safeguarding of the site under Policy WLWP 1 is linked to demonstrable, monitored compliance with amenity protections, not treated as unconditional.<br>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.<br><br>No, the Plan is not sound in relation to Policy WLWP 4. The Policy is relied upon (Plan para 8.29; IIA paras 1.52–1.53) 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 does not include an explicit, monitored requirement for pest control at | | |

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| | | | | | | 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 living near [Location/address removed for data protection]<br>Is not objecting to the Plan as a whole, which consider sound in other respects. | | |
| **8. Proposed Policies – Policy WLWP 5: Deposit of Waste on Land** | | | | | | | | |
| 02.1 | Anne Denby | Canal & River Trust | Policy WLWP 5 – beneficial use of non-inert excavated material | | | The Trust is a charity who look after 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places. 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. Caring for our waterways and promoting their use can improve the wellbeing of our nation.<br>The Trust is a statutory consultee in the Development Management process and a Specific Consultation Body for Local Plan making, and welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and | | Noted. WLWP 5 addresses the recovery and disposal of inert and non inert waste to land by way of permanent deposit, with deposit of inert waste being generally supported, whereas the disposal of inert or non inert waste is subject to more stringent requirements.<br>In that context sub-soil, if waste, will generally be regarded as inert, which leaves topsoil and mineral-based dredgings. Care would need to be exercised if using waste that exceeds inert landfill thresholds in construction due to potential to degrade or spread contamination. Topsoil can be regarded as waste, see for example Environment Agency guidance on the use of manufactured topsoil (RPS190 https://www.gov.uk/governme |

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| | | | | | | enhanced within an appropriate policy framework.<br>The Trust own and manage the Grand Union Canal (GUC), the Paddington Arm and Slough Arm of the GUC and Brent (Welsh Harp) Reservoir.<br>The Trust previously commented that the policy is supportive of the deposit of inert waste for beneficial purposes and mentions soil. 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.<br>The Council's comments are noted. The Trust is not in agreement that topsoil is not generally regarded as a waste. Based on 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.<br>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. | | nt/publications/use-of-manufactured-topsoil-rps-190/use-of-manufactured-topsoil-rps-190). The assessment of proposals will take into account the whole Development Plan to ensure sustainable waste management practices are employed. Site Specific issues can be considered as part of planning applications. |

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| | | | | | | 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. | | |
| 19.4 | Philip Barnes | London Parks & Gardens (London Historic Parks & Gardens Trust) | Policy WLWP 5 Part C | | No | The policy fails the test of soundness on the grounds of not being effective. | 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. | Noted. The Plan is to be read alongside national decision-making policies in the NPPF and the rest of the Development Plan, which includes adopted local plans i.e. relevant development plan and spatial strategies. |
| | | | Policy WLWP 5 | | | See Rep No. 12.3 (Heathrow West) under Policy WLWP 1, which also seeks changes to Policy WLWP 5. | | |
| **8. Proposed Policies – Policy WLWP 6: Circular Economy and Resource Efficiency** | | | | | | | | |
| 18.4 | Jasvir Mann | London Borough of Tower Hamlets | Policy WLWP 6 | | | Policy demonstrates consistency with London Plan Policy SI7 and is justified in its approach; it also aligns with the approach and objectives of Policy CG4 in the draft LBTH Local Plan. | | Comment noted. |
| 44.3 | Adham Aloka | | Policy WLWP 6 | Yes | No | While the theoretical ambition of Policy WLWP 6 is welcome, the current drafting is performative rather than effective. The policy lacks robust, quantifiable metrics. | Mandate quantifiable thresholds: replace the existing aspirational text with hard operational metrics, for example: "All new waste management applications must legally | Noted. The WLWP sits underneath the London Plan in terms of the policy hierarchy and is to be in general conformity with the Plan. Policy SI 7 Reducing waste and supporting the |

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| | | | | | | 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.<br>The proposed modification makes the policy effective and deliverable, providing local planning committees with the precise, unambiguous regulatory leverage needed to reject substandard applications and enforce the circular economy transition. | 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."<br>(Respondent states that the modifications "must be integrated prior to submission".) | circular economy sets requirements for all London boroughs, which will need to be followed in addition to WLWP 6.<br>Policy WLWP 6 requires proposals to demonstrate how circular economy principles are incorporated in design, construction and operation, with proportionate supporting information under paragraph 8.61.<br>No specific value or evidence is supplied for the suggested "[X]%" threshold; a uniform ring-fenced proportion would not necessarily suit the different waste streams and facility types. |
| 50.1 | Mari Honda-Wulf | | General – circular economy (Policy field: "Circular economy") | Yes | Yes | Feedback is not on 'Waste Sites', deemed to be the primary focus of the plans, but each citizen's participation in Circular Economy i.e. how to tackle HIC wastes, while C&D etc wastes cannot be controlled from the individual level.<br><br>UK population's manner and behaviour with wastes have been found one of the worst in the OECD countries: littering, dumping, little knowledge on recyclable items<br><br>Councils should work on educating the population through bills and mails or at public | None stated | Representation noted. Whilst the WLWP is principally concerned with ensuring that adequate waste management capacity is provided, the policies also seek to ensure that waste is managed as high up the hierarchy as possible. The strategy of the WLWP is therefore intended to complement prevention and reduction initiatives. |

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| | | | | | | facilities how to reduce and recycle wastes, detailing how each recyclable is treated in the chain of circular economy (paper, cans, glasses and plastics should be the mains from households);<br>Introduce ASAP cans and bottles (glasses and plastics) recycling points for credit (like 10–20p per item) at major supermarkets, as most continental European countries introduced decades ago. | | |
| 53.1 | Reza Maleki | | Policy WLWP 6 – food and organic waste; Plan generally | | | As a local resident engaged with Ealing Council on environmental initiatives, welcomes the updated strategy for managing waste across the West London boroughs up to 2041.<br>Submits the following points to help ensure the plan is environmentally sound and effective.<br>- 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.<br>- Promoting Plant-Based and Sustainable Solutions: Encouraging home composting and supporting community-based organic recycling | None stated. | Representation noted.<br>The WLWP supports the application of the waste hierarchy. Whilst it is principally concerned with the ensuring that adequate waste management capacity is provided, the policies seek to ensure that waste is managed as high up the hierarchy as possible. The strategy is therefore intended to complement prevention and reduction initiatives. Policy WLWP6 also seeks to embed circular economy principles into all waste related developments. |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | schemes will significantly reduce emissions and lower the carbon footprint of waste management in West London.<br>Incorporating these priorities will make the West London Waste Plan sounder, more sustainable, and aligned with climate action goals. | | |
| 57.1 | Ruth Mayorcas | | Circular economy; single-use plastics | Yes | No | Seriously very disappointing to see the lack of ambition to reduce either single use plastic use or even biodegradable products.<br>Where there 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 biodegradable does not mean it biodegrades unless in an industrial machine — likewise composting.<br>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 this waste is thrown in street bins and is not recycled nor composted nor biodegraded. | It is unsound as it is simply not good enough for the mountain of waste being generated.<br><br>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. | Noted.<br>Policy WLWP 6 supports waste prevention and resource efficiency as part of waste related development proposals.<br>The WLWP is a land use plan and can only deal with planning matters. Charging for takeaway containers, product taxation and conditions for council events are operational or fiscal matters and cannot be imposed through a land use plan such as the WLWP. |
| **8. Proposed Policies – Policy WLWP 7: Provision of Wastewater Treatment Infrastructure** | | | | | | | | |

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| 55.1 | Paul Massey | | | No | No | Wish to record that strongly opposes "the West London wastewater plan". Given the history of failed sewage treatment dumping in the Thames, cannot trust Thames Water to conform.<br>The idea of legally pumping treated sewage into the Thames appals him, particularly as some Richmond residents use the Thames for bathing and other water sports; environmentally it would be a disaster. Paris has shown that it appreciates the benefit of the cleanliness of its river; 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.<br>Build more reservoirs.<br>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".<br>. | | Comments noted.<br>Policy WLWP7 was added to the Plan to provide a planning framework for the provision, safeguarding and enhancement of wastewater treatment infrastructure, following the statutory utility provider (Thames Water) request at Regulation 18.<br>The operation and regulation of wastewater treatment and sewage discharges go beyond the land-use planning matters addressed by the WLWP, and proposals will be assessed against the established planning and environmental frameworks. No modification is proposed.<br>The Plan has been prepared in accordance with the relevant statutory requirements. |
| **9. Policies Map** | | | | | | | | |
| | | | | | | No representations received. | | |
| **Glossary** | | | | | | | | |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | No representations received. | | |
| **Appendix 1: Monitoring Framework** | | | | | | | | |
| 10.3 | Husain Akhtar | Harrow Monitoring Group | Appendix 1, Monitoring Framework | n/s* | No* | 1. Fifth, the 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. | 1. 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. | Noted<br>The Monitoring Framework is considered appropriate for WLWP. |
| 19.8 | Philip Barnes | London Parks & Gardens (London Historic Parks & Gardens Trust) | Appendix 1, Monitoring Framework | | No | The plan fails the test of soundness on the grounds of not being effective.<br>Appendix 1, the monitoring framework, contains no heritage, historic environment, landscape, open space or green infrastructure indicator. | 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. | Comments noted.<br>The Monitoring Framework is considered to provide a robust basis against which plan implementation will be monitored. |
| 35.3 | Laura Waters | Spelthorne Borough Council | Appendix 1, Monitoring Framework | See 35.1 | See 35.1 | "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." | "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 | Noted<br>The effectiveness of any indicators should be considered against the information available and their ability to identify a material change to which the plan making system can respond, including the |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | | biodiversity and green infrastructure outcomes." | Heathrow review provision in paragraph 1.8. |
| 49.3 | Victoria Hollertz | | Appendix 1, Monitoring Framework; paragraph 2.12 | See 49.1 | See 49.1 | 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 [Location/address removed for data protection]. Asks 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.<br>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, 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 | Please see 49.1. | Noted. The WLWP, national planning policy and the rest of the Development Plan include policies that protect amenity. The WLWP Monitoring Framework is considered to provide sufficient detail to monitor plan implementation effectively. Outside of the planning process, there will also be other regulatory controls.<br>The WLWP Monitoring Framework cannot impose a reporting requirement on sites outside of the WLWP area. |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | transparent, ongoing means of assessing whether Policy WLWP 4's protections are being delivered in practice, rather than relying on ad hoc complaints. | | |
| | | | | | | | | |
| **Appendix 2: List of Safeguarded Waste Sites (site-specific representations listed by site reference)** | | | | | | | | |
| 01.1 | DP9 Ltd (agent) | British Land Properties Limited | Site B12 Unit 2, Hannah Close, Wembley – removal from safeguarding | See 01.2 | See 01.2 | At Regulation 18 BL sought removal of the Site or, if not removed, reduction of the safeguarded capacity to 185,000 tpa; the capacity was reduced to 185,000 tpa at Regulation 19, but the representation reiterates the need to go further and remove the Site as a safeguarded waste site in its entirety.<br>Summary case: release would not compromise a significant continuing regional waste capacity surplus; the Site's location within the Wembley Growth Area and SIL means it would provide a valuable contribution by being used for other industrial purposes; there is a lack of market demand for waste use due to its size, condition and location; and the temporary NLWA operations, currently frustrated by the major fire at the Site with no prospect of resumption, would have in any event ceased next year. Release accords with Policy WLWP 1 and | Remove the Site (B12, Unit 2 Hannah Close) as a safeguarded waste site in its entirety – i.e. add it to the list of sites to be removed from allocation/released from safeguarding, so that it is no longer subject to waste use safeguarding. | Comments noted. The Submission Plan continues to support the safeguarding of sites with an established lawful waste use as part of a locally justified and evidence-based approach to safeguarding existing and potential waste management capacity, consistent with the objectives of the London Plan safeguarding framework. No modifications proposed.<br><br>The August 2026 fire, the stated position on NLWA's occupation, rebuilding costs and marketing evidence are site-specific considerations, distinct from planning status of the land. |

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| | | | | | | the justifications for other sites proposed for release.<br>Site context: Unit 2 is leased to the NLWA, who are due to vacate during 2027 (relocating to Geron Way, Brent Cross Cricklewood, LB Barnet); the Site has been used as a temporary waste transfer station for the last 5 years. The Site is in the Wembley Growth Area (Brent Local Plan), the Wembley Opportunity Area (London Plan) and the Wembley SIL; the OPA (ref. 25/3290, submitted December 2025) for a range of uses forming part of BL's last-mile logistics portfolio was recommended for approval by delegated authority on 18 August 2026.<br>Fire: on 28 August 2026 a major fire (reportedly 20 fire engines and around 125 fire fighters) broke out; the building was already of poor condition. NLWA have had to divert operations elsewhere and no waste is currently managed at the Site. Initial indications … are that the building … would need to be rebuilt and it is unlikely that the Site would be capable of repair during the term of NLWA's lease; whether it is repaired for future waste use will be subject to further consideration, having regard to all relevant matters, including the insurance position. Further detail to be provided at | | |

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| | | | | | | or prior to the EiP. (Elsewhere the letter states that as a result there is currently no building on Site which could accommodate the waste facility and this would need to be rebuilt, and that 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.)<br>Industrial intensification: development in SIL should intensify industrial uses (London Plan GG2, SD1, E4, E5, E7) and meet LBB's projected need of 46.9 hectares of industrial land by 2041. The Brent Industrial Land Audit (October 2019) identifies 834,486 sqm of industrial floorspace and clear opportunities for intensification at the Wembley NW10 site; LBB's Delegated Report on the OPA refers to a significant opportunity to optimise and significantly intensify the use of a designated Strategic Industrial Location. Brent AMRs show a net loss of 2,152 sqm of industrial floorspace (since 2021 / up to 2023), against BLP Policy BE2's target of 0.6 ha (6,000 sqm), increasing the target to 0.8 ha.<br>In the draft London Plan (July 2026) the Site is within the Wembley Brownfield First Opportunity Area; dLP Policies | | |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | PV1, MBUL1, MBUL2, GLE2 and GLE3 (data centres) support intensification and alternative industrial uses. The Site has excellent vehicular accessibility via Hannah Close and Great Central Way (B4557) to the A406, confirming suitability for industrial intensification, in particular logistics including last-mile.<br>Site history: waste consent in 2009 (ref. 09/2245, as amended) for a MRF and 2.5 MW biomass CHP plant; the CHP plant was never constructed. The previous operator, Seneca, failed to sustain a successful permanent waste management operation, leading to the transfer of the environmental permit; There is clear evidence that the Site has never achieved a sustained period of successful and permanent waste operations: Seneca saw declines in throughput from 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. NLWA's relatively well sustained operations have been temporary, for North London waste, and will end in 2027. It is evident the Site has not been able to achieve the establishment of a permanent sustainable waste use within the last 16 years. | | |

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| | | | | | | LB Barnet opted against more permanent operations at the Site for reasons of viability and costs; after NLWA leave there are no arrangements for any waste to be managed on the Site. BL has been active in seeking other waste occupiers.<br>Knight Frank survey (September 2026): approximately 20 waste operators/participants contacted; 15 responses (further awaited). Assumptions: site and buildings fit for purpose; operational rail connection; capable of approximately 185,000 tpa of HIC and/or CD&I waste; current NLWA passing rent – the survey did not take account of fire damage and the sidings are not operational, so results should be considered on a qualified basis. Result: 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; reasons cited include rent, business rates, insurance, operating and permitting costs, plant/infrastructure costs, limited capital for speculative ventures; various operators would only consider it with a long-term LA contract or guaranteed waste stream; many had no requirement for that capacity in the area; one noted limited offtakes and that rail use would | | |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | need an additional 1,000 tonnes per day (equal to 1 train load). The viability concerns were raised notwithstanding the impacts of the fire; the passing rent assumed was based on the building now damaged to an extent that it is anticipated it will require rebuilding.<br>CBRE market testing (September 2024) of all major London operators achieved an 89% response rate; all respondents had no interest in the Site, due to existing capacity and the potential to expand at their own or other sites. The lack of demand for the Site has been evidenced to be unchanging for multiple years.<br>Even before the fire the building could not have taken an institutional lease and significant investment/redevelopment would have been required. As indicated by the Survey, the facility is unviable as a private sector investment and would require public funding, aggravated by the fire; a new building would generate higher rents, which would likely be exacerbated by fit-out costs (MEP, fire protection) and the need to meet the highest practicable environmental standards under Policy WLWP 4. All of the available information evidences that there is not a realistic prospect of any such | | |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | operations being established at the Site in the future.<br>Applying the Policy WLWP 1 Part F factors: (i) particular circumstances – condition and impact of the fire, not currently in use, location in the Wembley Growth Area and SIL, where continued safeguarding would undoubtedly compromise policy support for intensification and very arguably prevents its optimal use; (ii) wider market conditions (para 8.19) – the surveys show (a) insufficient ongoing demand for waste use, and (b) the concerns apply equally to other waste uses so there is no realistic prospect of future waste operations. General policy direction (WLWP 6, dLP GLE11, GLE12) points to waste reduction and circular economy. BL has had advanced discussions with a potential industrial tenant.<br>Surplus: considering para 8.5 of the dWLWP (release without replacement capacity where capacity is sufficient; London Plan para 9.9.3), it is beyond any question that the Site has been shown to be surplus to capacity requirements, so the Site could be released for other land uses, and the WLLPAs must consider the Site for release; in such cases compensatory capacity under Policy SI9 is not required. After release there would still be | | |

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| | | | | | | surplus waste capacity … so its removal would not be prejudicial to meeting waste needs; adding the Site to the release list would ensure the dWLWP simultaneously accommodates for the appropriate amount of waste capacity as well as the need for industrial intensification, noting the live application for significant intensification.<br><br>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. (HO12 Initial Washrooms, E10 Atlas Wharf, E21 Quattro, B11 Mitre Works, B03 Land at Neasden Goods Yard, B09 Unit 6 Neasden Goods Yard)<br><br>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 | | |

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| | | | | | | within a growth area; or the cessation of operations.<br><br>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.<br><br>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<br><br>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 | | |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | conditions in that context, should be released from safeguarding for waste use.<br><br>Conclusion: the lack of demand and feasibility, supported by the surplus remaining without the Site, 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 release. | | |
| 04.4 | Vilna Walsh / Jack Clemance, Firstplan (agent) | Day Group Ltd | Site HO07 Brentford Aggregates Materials Recycling Facility (Appendices 2 and 3) | n/s* | n/s* | 1. Day Group hold a long leasehold interest in and operate the site at Unit 8 Transport Avenue, Brentford (Site Ref: HO07) for, amongst other activities, waste management and transfer functions. The site "extends to some 3.8 hectares" (Figures 1 and 2).<br>2. The 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, plus other aggregates and recycling activities and a rail served concrete batching plant (operated by Holcim) "which uses exclusively rail imported aggregates supplied by Day Group." | None. | Representation noted |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | 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." If this capacity was not available locally, importing primary aggregates instead "would add another 3,500,000 lorry miles (700 lorry movements per week) and 4,400 tonnes of CO2" together with increased particulates and nitrogen oxides in west London.<br>4. Day Group has operated from the site since 1955 and continues to make substantial investments in new plant and equipment; it is "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."<br>5. Appendix 2, Site HO07 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."<br>6. Appendix 3 is supported by way of mapping of the Day | | |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | Transport Avenue site (Site Ref: HO07). | | |
| 05.1 | Christian Smith, GP Planning Ltd (agent) | Envar Composting Ltd | Site HI18 High View Farm (Appendices 2 and 3) – safeguarded boundary | No | No | The Envar site is safeguarded as HI 18 (Appendix 3, p.171). 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, and the Proposed Submission WLP has not taken into account the representations made; Envar 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."<br>Planning permission 39755/APP/2023/652 (21 June 2024, Hillingdon as WPA) was granted for regularisation of the existing green waste composting operations and extension to the open windrow compost maturation yard, a storage container, site offices, welfare building, weighbridge/weighbridge offices, "2 no. leachate holding tanks, 2 no. 180kW generator sets", landscaping and ecological enhancement, "including a change of use of the land from pasture to a waste management use." On drawing GPP-E-WLC-EX-22-01 v04 (Appendix 2) the existing safeguarded land is shaded light orange and the other land with the June 2024 permission is edged red (other | Modify Map for HI18 to cover the whole area subject to planning permission (39755/APP/2023/652) to be identified as safeguarded; "Map HI 18 should be amended." | The site boundary for HI 18 will be amended in line with the most up to date planning permission red line boundary and could be considered as a modification. |

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| | | | | | | land in Envar's ownership is edged blue). "That land should be safeguarded as it is a lawfully implemented planning permission."<br>The Regulation 18 Consultation Statement (Final v2.2 28.05.26, p.45) confirms that the boundary has been amended ("Change Proposed – boundary amended"), but the safeguarding plan has not been amended. The Plan "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." | | |
| 05.3 | Christian Smith, GP Planning Ltd (agent) | Envar Composting Ltd | Site HI18 – relocation of Waste Transfer Station | No | No | As part of the proposed change of use of the IVC facility, Envar proposes to relocate the existing Waste Transfer Station building to the north of New Years Green Lane (drawing GPP-E-WLC-COU-26-05) "so that all waste operations can benefit from being co-located avoiding the need to cross the road." Relocation will enable Envar to consolidate and co-locate its entire waste treatment and recycling operations north of the lane, "optimising recycling and providing economic and operational benefits", negating the need for heavy machinery crossing the road regularly throughout the day, reducing time and travel costs, with public and employee safety, highway | None stated. (The relocation of the WTS is put forward as part of the proposed change of use of the IVC land – see 05.2.) | At present the Waste Transfer Station is south of the lane and was granted planning permission in April 2026 subject to S106, which remains outstanding at present, for expansion. This undermines the claim about movements across the road, as it appears the Waste Transfer Station is related to the composting operation in some way (hence the claimed benefit of co-location). |

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| | | | | | | safety and business viability benefits. "The relocation of the WTS will also ensure that there is no loss of waste management capacity in the WLP review." | | |
| 08.2 | Frederick Bomford | FM Conway Ltd | Site HI24 - Heathrow Recycling / Heathrow Asphalt Plant | Yes | Yes | Good to see Heathrow Recycling (site HI24) listed as a safeguarded site in the new waste plan.<br>Please note Heathrow Asphalt Plant (site HI24) will be operated by Conway Eurovia Industries Limited (CEIL) as of Jan 1st 2027 and not FM Conway Ltd (Change of name only).<br>The capacity 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). | None stated. | Noted. Agreed that operator details could be updated in Appendix 2. |
| 10.4 | Husain Akhtar | Harrow Monitoring Group | Sites HA01 Forward Drive CA Site and HA02 151 Pinner View (Harrow) | n/s* | No* | 1. Published planning material identifies Forward Drive (operated by Harrow Council) as a waste transfer/civic amenity operation with assessed capacity of 30,757 tonnes per annum; the Pinner View metal-recycling site (operated by Harrow Breakers) has an assessed capacity of 2,247 tonnes per annum and handles hazardous waste.<br>2. Pinner View also provides access to Headstone Manor Park and the historic Headstone | 1. 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 | Noted - any proposals to intensify existing sites will be assessed through the planning application process, and under Policy WLWP2 and WLWP 4 in particular |

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| | | | | | | 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 "deserves explicit site-level consideration."<br>3. Climate resilience: the WLWP flood evidence records areas of low, medium and high surface-water flood risk at both Harrow sites – throughout the site at Forward Drive, and predominantly in the eastern section at 151 Pinner View. The assessment recommends directing future expansion away from high-risk areas and appropriate mitigation.<br>4. Harrow provides a case study because two sites are proposed for continued safeguarding while the borough contains pronounced differences in deprivation and environmental circumstances. | irrespective of its local consequences." | |
| 11.3 | Emily Fitzpatrick | Heathrow Airport Limited | Sites HI06 Land off Holloway Lane, Harmondsworth (27,209 tpa, CDEW) and HI09 Holloway Lane Materials | | No | The EIA Scoping Report Addendum Figure 2.1 (Appendix 2) demonstrates these sites will fall within the Heathrow expansion DCO limits and will form part of the CNGI, strongly supported by the Government in national policy. "Therefore, there | "For the plan to become sound these sites – HI06 and HI09 - must be removed from the safeguarded list." | Release of these sites without proper justification would not be in general conformity with the London Plan, and the sites do not meet the qualifying criteria adopted by the WLLPAs in identifying sites for release |

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| | | | Recycling Facility (63,758 tpa, HIC/CDEW) | | | 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."<br>The paragraph 7.3 capacity assessment for CDEW demonstrates a surplus of 0.37 Mtpa over the 2041 forecast; if both sites were released, as a worst case there would be 0.28 Mtpa residual CDEW capacity by 2041.<br>Loss of HI09 would result in residual HIC capacities of 0.44 "Mtp" against the baseline and 0.29 "Mtp" against the 2041 forecast as a worst case. This demonstrates sufficient residual capacity for their waste types if released, "meaning their loss would not prejudice the wider Waste Plan."<br>Inclusion of the sites is unsound: need not justified for capacity; not effective as the surpluses mean 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 not consistent with national policy (HENPS and NPPW).<br>Summary: there is a conflict with the draft DCO limits for HI06 and HI09 "where these sites will be necessary to support the CNGI works." "Their inclusion is | | through the WLWP so release is 'plan led'.<br>See also Rep 37.1 (SUEZ). |

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| | | | | | | 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." | | |
| 16.2 | Matt Mehegan, Waste Planning & Permitting Ltd (agent) | L&B Holdings Limited | Site B16 Hannah Close, Neasden – boundary and Regulation 18 record | No | No | L&B owns 3 Hannah Close, Great Central Way, Neasden (NW10 0UX), identified as site B16. Welcomes that the size of the safeguarded area has been reduced by about 1/3, so that it is consistent with the boundary shown for Environmental Permit EPR/DP3791NJ.<br>That permit was granted in December 1998, so existed when 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.<br><br>L&B has been put through entirely unnecessary bureaucracy - and cost - to achieve a just outcome; 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.<br>L&B's Regulation 18 response calculated the then assessed | Correct the Regulation 18 Consultation Statement record to read: "Should be released from safeguarding. Waste acceptance ceased in December 2023. If released, would reduce surplus capacity by [4% struck through] 1% in West London leaving a surplus by 2041 of 1,159,340t. Site well located for alternative use, which safeguarding stifles" ("1% in West London" and "a" shown as insertions). | Noted that change in site boundary since Regulation 18 stage welcomed.<br><br>With regard to the site boundary shown on the Brent Local Plan policies map, it is acknowledged that this does extend across a wider area than that covered by the Environmental Permit which has led to a lack of clarity. Once the WLWP is adopted, the boundaries of safeguarded waste sites will be updated on Brent's Local Plan policies map.<br><br>The WLLPAs understand the basis of the different calculations put forward within the Regulation 18 representation. As the authorities are working |

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| | | | | | | capacity (16,696 tonnes) as 4% of Brent's C&D current capacity contribution (408,545 tonnes) and 1% of the WLWP area's C&D capacity contribution in 2027 (1,484,795 tonnes),and said release would reduce the 2041 surplus across the WLWP area by 1.4% (16,696 ÷ 1,176,036), leaving a surplus of 1,159,340 tonnes.<br>The Regulation 18 Consultation Statement (page 38) summarised the representation as …If released, would reduce surplus capacity by 4% leaving surplus by 2041 of 1,159,340t… (representor On behalf of L&B Haulage (site occupier); response No change proposed - site retained as meets proposed WLWP safeguarding criteria).<br>The Alliance has mis-stated its representation: it appears to imply L&B said release would reduce the surplus capacity by 4% in the WLWP area; L&B did not say that. L&B said its site accounted for 4% of Brent's current capacity, 1% of WLWP's current capacity and, if lost, 1.4% of the then stated surplus capacity predicted for 2041 would be lost. Requests the Alliance correct the record. | | together as a group to meet capacity requirements, the regional capacity is the key measure rather than individual boroughs' capacities. |

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| | | | | | | | | |
| 16.3 | Matt Mehegan, Waste Planning & Permitting Ltd (agent) | L&B Holdings Limited | Site B16 – assessed capacity | No | No | The site's assessed capacity is stated as 16,696 tonnes of CDEW (Appendix 3); the figure was in the adopted 2015 plan and has been rolled forward. It relates to the year 2011 and would have been the highest peak figure in the 5-year rolling period up to the date of the adoption of the 2015 Plan.<br>Table 2 (WDI data): tonnes received 2006 37,729; 2007 27,982; 2008 19,582; 2009 21,695; 2010 20,932; 2011 16,696; 2012 11,112; 2013 3,428; 2014 5,847; 2015 3,640; 2016 5,400; 2018 8,900; no figures for 2017 or 2019-2025. 5-year rolling maximum falls from 37,729 (2010) to 16,696 (2015), 11,112 (2016), 5,847 (2017) and 8,900 (2018-2022); none shown 2023-2025.<br>L&B's experience is that tonnages received into its site reduced over time, a trend plainly visible in the WDI data; L&B considers this trend to be typical across the industry and it | 1. Give the assessed capacity for B16 as 8,900 tonnes, with the waste being in respect of CDEW. And the process being transfer, not treatment. | The WLWP Capacity Assessment 2026 (update) (para 4.21) sets out that reference has been made to the peak capacity assessed as part of the evidence base of the adopted WLWP 2015 when assessing site capacity. In the absence of justification for a lower capacity figure, 16,696tpa is considered to be a realistic measure of the site's capacity.<br><br>Comment regarding declining tonnages of waste received over time, at this site and across the industry, noted. However, the C, D & E data |

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| | | | | | | is among the reasons leading to L&B's closure of the site. The pattern is also recognised in the Regulation 18 representation by British Land (adjacent site, 2-6 Hannah Close).<br>Reviewing the WDI data over the current 5-year rolling period identifies a figure of 8,900 tonnes. L&B considers this figure has been arrived at in a way that is consistent with the currently adopted development plan, whilst taking account of and placing relevant weight on proposals in the Regulation 19 Plan. | | report which forms part of the WLWP evidence base does not indicate declining tonnages over time sector-wide. |
| 16.4 | Matt Mehegan, Waste Planning & Permitting Ltd (agent) | L&B Holdings Limited | Site B16 – removal from safeguarding | No | No | The Regulation 19 evidence gives the 2041 C&D surplus for West London as 851,204 tonnes (Capacity Assessment v3.1, Table 5). Loss of L&B's proposed revised capacity would reduce this by (8,900 ÷ 851,204) x 100 = 1.0%, which L&B submits would be insignificant, still leaving a surplus of some 842,304 tonnes; L&B further says even after the loss of its contribution sufficient suitable waste management capacity would remain.<br>London Plan Policy SI 9, and particularly the principle in para 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 | L&B 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. | Comments noted. The Submission Plan continues to support the safeguarding of sites with an established lawful waste use as part of a locally justified and evidence-based approach to safeguarding existing and potential waste management capacity, consistent with the objectives of the London Plan safeguarding framework. No modifications proposed. |

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| | | | | | | substantial surplus remaining even after B16 is removed.<br>L&B considers it is caught in the middle of the issue raised by the East London Boroughs at Regulation 18 and the inconclusive replies by the Alliance as to the need for (and lack of) a formal process for capacity sharing across London (Consultation Statement page 54): its site is inhibited from release even though there appears to be surplus capacity.<br>The site is in the Wembley Area Action Plan area on land identified as SIL, and well suited to assist economic growth and employment (Brent Local Plan policy BE1). It 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, prejudicing new investment, preventing evolution and innovation and inhibiting wider planning and regeneration objectives.<br>L&B questions whether the updated WLWP is sound and does not consider it justified to retain B16 as a safeguarded site, including because it makes only a limited contribution to capacity in the context of the scale of the surplus identified.<br>If the Alliance insists on retaining B16, asks it to respond in writing | | |

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| | | | | | | to L&B, specifically addressing why, with such a large overcapacity for C&D waste and the site's location in the Wembley Area Action Plan area, B16 should still remain – why is it required?<br>Reserves its position to participate in the Examination Hearings if B16 remains safeguarded when the WLWP is submitted. | | |
| 19.9 | Philip Barnes | London Parks & Gardens (London Historic Parks & Gardens Trust) | Site R02 Kew Gardens Compost (Richmond) | No | No | 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.<br>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.<br>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. | Delete R02 from Appendices 2 and 3.<br>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. | Noted. The Plan is to be read alongside national decision-making policies in the NPPF and the rest of the Development Plan, which includes adopted local plans i.e. relevant development plan and spatial strategies. The IIA does not have to assess the effects of safeguarding ongoing, existing waste management uses.<br>Safeguarding an existing waste use does not grant permission for intensification or remove heritage protections. New or enlarged operations would be assessed under Policy WLWP 4 and the wider development plan, including effects on the historic environment; see also Rep 23.1 on the proposed policy clarification. |

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| | | | | | | Proposal results in statutory safeguarding applied inside a Grade I registered landscape and World Heritage Site "(legally compliant?)".<br>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.<br>See London Parks & Gardens Inventory: Royal Botanic Gardens, Kew (RIC068). | | |
| 19.10 | Philip Barnes | London Parks & Gardens (London Historic Parks & Gardens Trust) | Sites B01 and B02 Twyford Abbey Road (Brent / OPDC) | | No | 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.<br>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.<br>Twyford Abbey is a Grade II listed house of 1807-09 with | Implement our recommended changes to WLWP 4 and WLWP 1(I) (see 19.1 and 19.6).<br>Insert an Appendix 2 annotation recording proximity to EAL053 so intensification under 1(D) is assessed against the setting.<br>Support the release of B02. | Noted. The Plan is to be read alongside national decision-making policies in the NPPF and the rest of the Development Plan, which includes adopted local plans i.e. relevant development plan and spatial strategies. The safeguarding of existing waste sites, form part of the baseline assessment, noting that most are safeguarded by virtue of the London Plan already. Formalising that safeguarding through the WLWP does not therefore require a fresh assessment. |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | 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.<br>See London Parks & Gardens Inventory: Twyford Abbey (EAL053); St Mary's Churchyard, West Twyford (EAL048). | | |
| 19.11 | Philip Barnes | London Parks & Gardens (London Historic Parks & Gardens Trust) | Sites HI18 High View Farm, HI13, HI15, HI21 (Hillingdon) | No | No | Failure to consider heritage impacts on adjacent sites of heritage interest.<br>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.<br>Harefield Place is on the National Heritage List.<br>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 | Implement the respondent's recommended changes to WLWP 4 (see 19.1).<br>The IIA's site-level finding should be carried into an annotation in Appendix 2 so it informs any future application. | Noted. The Plan is to be read alongside national decision-making policies in the NPPF and the rest of the Development Plan, which includes adopted local plans i.e. relevant development plan and spatial strategies. The safeguarding of existing waste sites, form part of the baseline assessment, noting that most are safeguarded by virtue of the London Plan already. Formalising that safeguarding through the WLWP does not therefore require a fresh assessment. |

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| | | | | | | 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.<br>See London Parks & Gardens Inventory: Old Park Wood (HIL035); Harefield Village Green (HIL023). | | |
| 19.12 | Philip Barnes | London Parks & Gardens (London Historic Parks & Gardens Trust) | Sites HO05, HO07, HO14 Brentford (Hounslow) | | No | Failure to consider heritage impacts on adjacent sites of heritage interest.<br>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.<br>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; | Could be resolved by our proposed WLWP 4 modification (see 19.1), with a landscape and visual appraisal and heritage statement required for any intensification under WLWP 1(D), given the concentration of registered landscapes here. | Noted. The Plan is to be read alongside national decision-making policies in the NPPF and the rest of the Development Plan, which includes adopted local plans i.e. relevant development plan and spatial strategies. The safeguarding of existing waste sites, form part of the baseline assessment, noting that most are safeguarded by virtue of the London Plan already. Formalising that safeguarding through the WLWP does not therefore require a fresh assessment. |

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| | | | | | | HO14 operates on a 1993 permission.<br>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). | | |
| 19.13 | Philip Barnes | London Parks & Gardens (London Historic Parks & Gardens Trust) | Site HO2 Western International Market (Hounslow) | No | No | Failure to consider heritage impacts on adjacent sites of heritage interest.<br>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.<br>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.<br>See London Parks & Gardens Inventory: Osterley Park (HOU038). | 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 (see 19.4). | Noted. The Plan is to be read alongside national decision-making policies in the NPPF and the rest of the Development Plan, which includes adopted local plans i.e. relevant development plan and spatial strategies. The safeguarding of existing waste sites, form part of the baseline assessment, noting that most are safeguarded by virtue of the London Plan already. Formalising that safeguarding through the WLWP does not therefore require a fresh assessment..<br>Appendix 2 identifies HO2 as a treatment facility with temporary permission, not a facility consented for permanent deposit of inert waste to land. The heritage concern is nevertheless noted; see Rep 19.9 on the effect of safeguarding and assessment of any new development. |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| 19.14 | Philip Barnes | London Parks & Gardens (London Historic Parks & Gardens Trust) | Sites HA01 Forward Drive and HA02 151 Pinner View (Harrow) | | No | Failure to consider heritage impacts on adjacent sites of heritage interest.<br>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.<br>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 (see 19.1).<br>The site plan boundary does not seem to be the same as on the Appendix 3 maps. | The boundary reflects lawful extent of waste uses on sites.<br>Noted. The Plan is to be read alongside national decision-making policies in the NPPF and the rest of the Development Plan, which includes adopted local plans i.e. relevant development plan and spatial strategies. The safeguarding of existing waste sites, form part of the baseline assessment, noting that most are safeguarded by virtue of the London Plan already. Formalising that safeguarding through the WLWP does not therefore require a fresh assessment. |
| 19.15 | Philip Barnes | London Parks & Gardens (London Historic Parks & Gardens Trust) | Sites R01 Townmead and R03 Langhorn Drive (Richmond) | | No | Failure to consider heritage impacts on adjacent sites of heritage interest.<br>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 | Our objection could be resolved by making our proposed modification to WLWP 4 (see 19.1), so that intensification under 1(D) is assessed against the Crane corridor and the Kew riverside. | Noted. The Plan is to be read alongside national decision-making policies in the NPPF and the rest of the Development Plan, which includes adopted local plans i.e. relevant development plan and spatial strategies. The safeguarding of existing waste sites, form part of the baseline assessment, noting that most are safeguarded by virtue of the London Plan already. Formalising that safeguarding through the |

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| | | | | | | submission or adoption of the plan.<br>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. | | WLWP does not therefore require a fresh assessment. |
| 19.16 | Philip Barnes | London Parks & Gardens (London Historic Parks & Gardens Trust) | Sites HI06 and HI09 Holloway Lane (Hillingdon) | | No | Failure to consider heritage impacts on Harmondsworth village green and St Mary's churchyard.<br>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.<br>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) (see 19.1 and 19.4). | Noted. The Plan is to be read alongside national decision-making policies in the NPPF and the rest of the Development Plan, which includes adopted local plans i.e. relevant development plan and spatial strategies. The safeguarding of existing waste sites, form part of the baseline assessment, noting that most are safeguarded by virtue of the London Plan already. Formalising that safeguarding through the WLWP does not therefore require a fresh assessment. |
| 19.17 | Philip Barnes | London Parks & Gardens (London | Site HO13 Fleming Way, | | No | Failure to consider heritage impacts on Redlees Park & Silverhall Park. | Objection would be resolved by Policy WLWP 4 | Noted. The Plan is to be read alongside national decision-making policies in the NPPF and the rest of the |

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| | | Historic Parks & Gardens Trust) | Isleworth (Hounslow) | | | 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.<br>Impacts of small hazardous and non-hazardous transfer site close to both parks of heritage interest.<br>See London Parks & Gardens Inventory: Redlees Park (HOU040); Silverhall Park (HOU049). | & WLWP 5 modification (see 19.1 and 19.4). | Development Plan, which includes adopted local plans i.e. relevant development plan and spatial strategies. The safeguarding of existing waste sites, form part of the baseline assessment, noting that most are safeguarded by virtue of the London Plan already. Formalising that safeguarding through the WLWP does not therefore require a fresh assessment. |
| 19.18 | Philip Barnes | London Parks & Gardens (London Historic Parks & Gardens Trust) | McGovern Plant / Wet Waste (Hounslow) – not currently safeguarded | | No | 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.<br>Our concern relates to policy weaknesses already identified and illustrates need for heritage | 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. | Noted. The site is still to be regularised, so any comment on what may follow would be premature as predetermination is to be avoided. |

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| | | | | | | impacts to be assessed in the plan.<br>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.<br>See London Parks & Gardens Inventory: Crane Valley Park (HOU018). | | |
| 28.1 | Jack Clemance, Firstplan (agent) | Quattro (UK) Ltd – Horn Lane | Site E07 Horn Lane Waste Transfer Station (Appendices 2 and 3); Strategic Objective 1; Policy WLWP 1 | Yes | Yes | Quattro operate the site at No. 307 Horn Lane (WLWP Site Ref: E07) as a waste transfer station, 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).<br>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 | None. | Noted and welcomed.<br><br>Given the site is located in Ealing, it is slightly confusing that reference is made to "Hounslow Planning Team via a pre-application advice request". |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | regard to increasing the amount of waste able to be managed.<br>Supports WLWP Strategic Objective 1, which 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.<br>Supports Policy WLWP 1 Safeguarding and Optimising the Waste Site Network in terms of achieving its intended approach of protecting, enhancing and optimising existing waste sites.<br>Supports Appendix 2 Site Allocation E07 'Horn Lane Waste Transfer Station' in that it identifies the Quattro Horn Lane Site as a Safeguarded Waste Site.<br>Supports Appendix 3 Site Ref: E07 'Horn Lane Waste Transfer Station' by way of mapping of the Quattro Horn Lane Site. | | |
| 29.4 | Vilna Walsh / Jack Clemance, Firstplan (agent) | Quattro (UK) Ltd – Southall Lane | Site HO2 Southall Lane Western International Market (Appendices 2 and 3) | | No | Supports Appendix 2 Site Allocation HO02 in that it identifies the Quattro Waste Site individually as a Safeguarded Waste Site (separate from the adjoining Household Waste Recycling Facility, now HO11; jointly allocated as Site Ref 2861 in the Adopted WLWP 2015). Fully supports the recognition that the site manages CDEW waste and the inclusion of | The assessed capacity for Site Ref: HO2 should be amended to state: 150,000 tpa. | Representation noted.<br>A modification could be considered so that capacity value listed against the site in Appendix 2 and subsequent amends to the capacity totals and calculated surpluses for the management of C&D waste which can be agreed through the examination process. |

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| | | | | | | CDEW as 'waste type managed' (Support in Part / Object in Part).<br>Supports Appendix 3 Site Ref HO02 'Quattro Site Southall' in terms of correctly mapping and identifying the Quattro Waste Site at Southall Lane.<br>Site description: C&D waste recycling facility and co-located concrete batching plant (CBP). The plant as assessed and erected can import and process up to 150,000 tonnes of C, D and E waste per year, and Quattro have secured an Environmental Permit to allow for this level. The CBP produces in the region of 65,000m3 of ready mixed concrete per year, requiring some 130,000 tonnes of sand and stone and some 19,500 tonnes of cement; co-location allows the recycling facility to supply 15% of the CBP's aggregate requirement as recycled aggregate, "amounting to some 19,500 tonnes of material per year". The CBP is described as highly sustainable an entirely complementary operation<br>Objects to the 'Assessed Capacity' of 64,347 tpa as incorrectly stated. It is understood to be based on the recent operation of the site, but does not reflect that under planning permission 01032/E/P48 (as amended by 01032/E/P48/NMA) the site has | | |

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| | | | | | | been assessed on the basis of managing up to 150,000tpa and, through grant of permission, confirmed as acceptable; Quattro have also secured an Environmental Permit for 150,000tpa.<br>At Regulation 18 the Consultation Statement (May 2026, page 41) responded to this point (summarised as "Confirm assessed capacity is up to 150,000 tpa") with "Change Proposed - Capacity assessment values adjusted to reflect feedback". It can only be assumed that 64,347tpa has been retained by mistake and should have been updated to 150,000 tpa; this "is potentially simply an omission".<br>Not justified: not correctly stating the assessed capacity of a site is not an appropriate strategy; the Consultation Statement appears to indicate agreement that a change was needed at least on assessed capacity but has not progressed that change. Not consistent with national policy / not in 'Conformity with the London Plan' (heading 4.16(iii)): not consistent with NPPF para 32 (policies underpinned by relevant and up-to-date evidence), the operator having provided the most up to date evidence at Regulation 18 and again through this response. | | |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | Quattro would be keen to engage early with the WLWA to review the required modifications ahead of submission of the WLWP. | | |
| 30.1 | Charlie Wan | Rapleys LLP (agent for the owners of sites B02 and E20) | Site B02 100 Twyford Abbey Road (page 115); Site E20 Land off Collett Way | Yes | No | 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).<br>The compensatory provision is to be provided at 'land off Collett Way' in the London Borough of Ealing (Planning Reference: 2405602FUL); the applicant is Rail Logistics Consultancy Ltd; planning permission was granted 18 February 2026.<br>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 than the maximum capacity assessed at 100 Twyford Abbey Road (when it was operational).<br>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 | 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 | Noted. The response to comments on the Regulation 18 Plan and footnote for B02 and E20 set out the need to retain site B02 until compensatory capacity has been built out and is ready to commence full operation. It's noted that the respondent will inform WLLPAs when Collett Way has been completed. If this information is provided in time, then the WLLPAs' can consider updating the position in the WLWP as we progress towards examination.<br>The EA permit register shows the permit is still held in the name of Wards of London Properties Limited (or Waste Management Ltd), so this was included. |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | more than 150,000 tonnes per year.<br>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.<br><br>All pre-commencement conditions relating to the compensatory site at Collett Way (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.<br>Below is a summary of completed works: groundworks commenced; foundations for the frame were started; the existing building was demolished and all | | |

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| | | | | | | remaining foundations and pits within the build area removed; the roof of the waste facility has been completed.<br>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 Site E20, Collett Way, as compensatory provision for site B02, with the footnote stating that the process to secure provision still has to be completed. As such B02 remains safeguarded until provision is secured at Collett Way.<br>As the planning permission for the compensatory waste facility at Site E20 has been implemented, with construction having commenced and progressing rapidly towards practical completion, the adopted plan should remove Site B02 from Appendix 2 to avoid any confusion.<br>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.<br>On behalf of the owners of both sites, request that Site B02 be removed from Appendix 2 and that the above minor changes to | | |

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| | | | | | | the site details be made in the adopted Plan.<br>Intend to remain as participants to ensure the profiles are updated and that Site B02 is removed as safeguarded site, and will inform WLWA when Collett Way has been completed and in operation. | | |
| 33.1 | Peter Dines | RPH Town Planning Limited (agent for the owner of site E19) | Site E19; Policy WLWP 1 (page 57, paragraph 8.17) | No | No | The site should be removed from the list of safeguarded sites in this draft plan.<br>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. This was not the whole site, but only the middle third. Autofleet had a licence from 2015 to break cars.<br>In the letter from LB Ealing, on the last page table, Autofleet Salvage Ltd are listed as occupiers of the whole site E19. LB Ealing's information is incorrect because:<br>- (1) Autofleet only ever occupied a third of the site (Block 2), between 2015 and mid 2026, and never occupied any other part of the site;<br>- (2) they have been gone from the site for the last three months.<br>No waste management operation has ever been carried out in either Block 1 or Block 2. | Exclude site E19 from the plan (Appendix 2 and Appendix 3). | Representation noted. The site continues to qualify for safeguarding based on the recent waste operation which is considered the lawful use in light of the duration of such activities. The extent of safeguarding illustrated in appendix 3 aligns with the plan supplied in the standard rules permit from 2015 (EPR/CB3406LH). Further information has been sought regarding the extent of Autofleet's operations across the site. Pending further clarity on this matter, there is insufficient evidence to justify a boundary amendment at this time. |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | 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.<br>The plan is not legally compliant or sound: The site is incorrectly identified in the Plan, and its contents is therefore not soundly based. | | |
| 34.1 | Philip Villars, PMV Planning (agent) | Sharp Refinery Service Ltd – Arlington Works | Arlington Works (Site R04 ) | No | No | Various pages including 14, 127, 193, various paragraphs including 3.12. Policy WLWP 1 – Safeguarding Waste Sites. Site Arlington Works (Facility Id 04) – Richmond upon Thames.<br>On behalf of the owner of Arlington Works, 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.<br>Emphasise that 17 local residents and the Twickenham Park Residents Association submitted representations to the Regulation 18 consultation objecting to the proposed safeguarding of Arlington works site. These comments highlight the concerns and issues associated with a waste use in this location.<br>Any waste use would require planning permission (see below), | 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. | Comments noted. The WLLPAs' response to the Regulation 18 representations provided clarification on the approach to safeguarding Arlington Works and the definition of an existing waste site within the WLWP.<br>The Submission Plan continues to support the safeguarding of sites with an established lawful waste use as part of a locally justified and evidence-based approach to safeguarding existing and potential waste management capacity, consistent with the objectives of the London Plan safeguarding framework. No modifications proposed. |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | and any application would clearly be opposed by local residents and likely refused by the Council.<br>As set out in 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.<br>The site does not have planning permission for a waste use. A 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).<br>The CLUED 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 | | |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | 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 closure of the of the oil transfer ad treatment business in 2018.<br>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.<br>Waste site definition: as set out on page 54 of the WLWP, the London Plan 2021 defines existing waste sites as having one or both of the following:<br>• sites that benefit from permanent planning permission that expressly consents the management of waste<br>• sites subject to an Environmental Permit that permits a waste management activity.<br>The draft new London Plan 2026 proposes the below definition of a waste site:<br>• a site whose primary activity is a waste-management operation that is authorised by the Environment Agency; or | | |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | • a site that has a lawful planning use as a waste site.<br>However, paragraph 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:<br>• is subject to an extant planning consent for waste use<br>• where a CLEUD for waste use has been granted<br>• is used for a waste use that has become lawful through the passage of time under planning legislation<br>• where waste use is ancillary to a wider lawful use.<br>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.<br>In any event, as explained in our previous representations and summarised below, the Arlington | | |

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| | | | | | | Works site does not meet the proposed WLWP definition:<br>• planning permission has never been granted for a waste use or operational development and the CLUED granted in 1994 cannot be relied upon<br>• the historic waste infrastructure including storage tanks has been cleared. The site has not been used for a waste use for over seven years.<br>• planning permission would be required to recommence a waste use.<br>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 concerns and issues with a waste use at Arlington Works. The site has been marketed since May 2025 and no interest has been received from waste or re-cycling operators.<br>Removal of Arlington Works as a safeguarded site would make better use of this underutilised brownfield site, in accordance | | |

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| | | | | | | with Policy L2 in the National Planning Policy Framework.<br>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. | | |
| 37.1 | Emma Smyth | SUEZ Recycling and Recovery UK Ltd | Sites HI28, HI29, HO14, HI06 and HI09; Policy WLWP 1 | n/s* | n/s* | (Headed Safeguarding existing sites – sound.) 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 and supported by Policy WLWP 1.<br>Also supports the recognition of the contribution of waste sites where a Certificate of Lawful Existing Use or Development (CLEUD) has been granted. | None. | Representation noted and welcomed |
| | | | Sites HO05, HO07, HO14 | | | See also Rep No. 23.1 (National Trust) under Policy WLWP 4 – proximity to Osterley House and Park. | | |
| **Appendix 3: Maps of Safeguarded Waste Sites** | | | | | | | | |
| | | | Appendix 3 maps | | | See Reps 19.14 (HA01/HA02 boundary), 28.1 (E07) and 29.4 (HO2) under Appendix 2. | | |
| **Appendix 4: Replacement of Policies in the 2015 WLWP** | | | | | | | | |
| | | | | | | No representations received. | | |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| **Appendix 5: Management Arrangements for West London's Waste** | | | | | | | | |
| 08.4 | Frederick Bomford | FM Conway Ltd | Appendix 5, paragraph A5.6 (road scrapings) | Yes | Yes | With reference to paragraph A5.6 of the plan which describes hard inert materials as including road scrapings, concern is raised that grouping all road scrapings as hard inert material is too broad an approach failing to distinguish between the different types of road scrapings.<br>The wording should distinguish between:<br>• Non-hazardous bitumen-based asphalt planings, 17 03 02;<br>• Hazardous asphalt containing coal tar, 17 03 01*;<br>• Any genuinely inert road materials."<br>The text refers only to recycling as aggregate and does not recognise scrapings (or even planings) reuse in asphalt as RAP, and the text should be amended accordingly The text should specify that RAP is a high value product (therefore not downcycling) which should be prioritised. | None stated. | Representation noted.<br>A modification could be considered to paragraph A5.6 to distinguish genuinely inert road materials from non-hazardous asphalt planings (17 03 02) and hazardous asphalt containing coal tar (17 03 01*), and to recognise recycling of suitable asphalt planings back into asphalt.<br>However review of the data does not indicate such a modification is necessary for soundness. |
| 26.1 | Debbie Prince | Oxfordshire County Council (Minerals and Waste Policy and Strategy) | Appendix 5, 'Flows to and from West London' (pages 200–201), paragraph A5.17 – strategic flows | | | Only one comment, on the section 'Flows to and from West London' , paragraph A5.17, and the supporting waste evidence.<br>The Environment Agency Waste Data Interrogator figures for 2024 show that Hounslow, | | Comments noted. This context is recognised, as referenced in the supporting documents - Strategically Significant Waste Flows and Waste Management Topic Paper. See further details in the Strategic Cooperation |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | to Oxfordshire; and supporting waste evidence | | | 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.<br>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':<br>- non-hazardous waste – 5,000 tonnes per annum;<br>- hazardous waste – 100 tonnes per annum;<br>- inert waste – 10,000 tonnes per annum.<br>We consider any movements above these thresholds to be a strategic waste movement.<br>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.<br>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 | | Statement, including on the engagement undertaken and future liaison, with regard to strategic flows.<br>Paragraph A5.17 states that the WPAs hosting the receiving facilities of this waste have been contacted to confirm that such flows may continue over the plan period. Given the flow to Oxfordshire was screened out, Oxfordshire County Council was not contacted. Table 3 of The Waste Management Topic Paper notes the end date of Sutton Courtenay, and review of WDI data over the past 3 yrs shows inputs from west London to have consistently declined. |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | made for the disposal of non-hazardous waste by landfill.<br>We have not had any discussions or reached agreement with West London for the management of waste past our current Plan Period.<br>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.<br>Happy to discuss the matter further. | | |
| 35.4 | Laura Waters | Spelthorne Borough Council | Appendix 5 – strategic facilities outside west London | See 35.1 | See 35.1 | "The Plan relies upon a network of strategic waste facilities outside the Plan area, including facilities within Slough, Buckinghamshire, Surrey and other neighbouring authorities."<br>"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." | "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."<br>The monitoring aspect is sought through the indicator on "reliance on strategic facilities outside west London" – see Rep 35.3. | Noted.<br>The plan can do little to influence the continuation of flows.<br>The potential cessation of existing flows would inform the need case, were proposals for replacement facilities to be located within west London to come forward. |
| **Appendix 6: Waste Sites Proposed for Release from Safeguarding** | | | | | | | | |
| 05.2 | Christian Smith, GP Planning Ltd (agent) | Envar Composting Ltd | Appendix 6 – release of the IVC facility land south of New | No | No | The now redundant IVC facility (land south of New Years Green Lane) has not been included in the 'Release of Existing Waste | Include the IVC facility land south of New Years Green Lane in the sites to be released from waste | The Submission Plan continues to support the safeguarding of sites with an |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | Years Green Lane (HI18) | | | Sites'; Envar objects to its lack of inclusion. The WLP has not taken into account Envar's Regulation 18 representation ("The Assessment of Safeguarded Site to be Released") that the IVC area should be released.<br>Responding to the Regulation 18 Consultation Statement (quoted, which called it "somewhat perverse" to seek to expand to the north while converting the IVC area to non-waste use): the IVC development was specially designed to recycle commingled green and food waste (x2 large reception hall buildings, a number of IVC tunnel structures and 6x water tanks; elevations enclosed at Appendix 3).<br>Open windrow green waste composting cannot be undertaken on the land south of the lane: it requires an open pad development with plenty of room, and "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."<br>Operations north and south should be kept separate, avoiding the need for vehicles, plant and equipment to cross the public highway, which "would create an unacceptable highway | safeguarding (Appendix 6), i.e. remove its safeguarded status through the WLP, to enable a subsequent application for light industrial/commercial uses. | established lawful waste use as part of a locally justified and evidence-based approach to safeguarding existing and potential waste management capacity, consistent with the objectives of the London Plan safeguarding framework.<br>The land does not meet the criteria for inclusion in Appendix 6 and will therefore need to be regularised through a formal planning application. |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | 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."<br>The IVC facility has become obsolete because local authority collection services have ceased collecting co-mingled green and food waste. (The land south of the lane was granted permission 12579/APP/2021/2010 on 31 August 2022 for "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.")<br>Section 57 of the Environment Act 2021 came into force on 31 March 2025; separate food waste collections are mandated for all households by 31 March 2026 and most businesses by 31 March 2025 (micro-businesses until 2027). Most collected food waste will go to AD plants, which benefit from financial incentives (FITs/Renewable Heat Incentive, Green Gas Support Scheme); "AD plants commonly offer more | | |

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| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | competitive gate fees as opposed to IVC facilities."<br>As a result 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"; Envar's IVC facility has become redundant and the IVC structures will need to be removed.<br>There is no reasonable likelihood of the IVC receiving further food or co-mingled green and food waste: 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" [sic] 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.<br>"Given that the IVC facility is redundant, the Applicant seeks to remove its safeguarded status through the WLP making process", which will lead to it seeking planning permission for a change of use "in due course". Envar will seek planning permission for change of use of the IVC land to Class B1, E1 and | | |

| Rep No. | Respondent name | Organisation (if given) | Part(s) of Plan responding to | Do you consider the Plan to be: | | Summary of issue(s) raised in representation | Modification(s) considered necessary by representor | WLLPAs' response |
|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | B8 (light industrial and commercial) uses. London Plan para 9.9.2 confirms release of existing waste sites should form part of the plan-led process (rather than ad hoc via planning applications).<br>The change of use "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."<br>The Plan "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 [response] to the Regulation 18 Consultation"; Envar therefore objects to the Plan as ineffective and not meeting the tests of soundness. | | |
| 06.10 | Charlotte Mann | Environment Agency | Appendix 6; Assessment of Existing Waste Sites for Release | | | Quotes paragraph 20 of the 'Assessment of Existing Waste Sites for Release' document on engagement activities including in relation requests received from other LPAs.<br>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, acknowledge they are | | Noted. The Assessment of Existing Waste Sites for Release document set out the rationale for the release of all six sites and demonstrates that identified waste needs will still be met |

| Rep No. | Respondent name | Organisation (if given) | Part(s) of Plan responding to | Do you consider the Plan to be: | | Summary of issue(s) raised in representation | Modification(s) considered necessary by representor | WLLPAs' response |
|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | part of a much larger masterplan for developing the area. | | |
| 09.9 | Nina Miles (for the Mayor of London) | Greater London Authority | Appendix 6 – sites proposed for release | | | Appendix 6 includes six existing waste sites proposed for release, with further details in the Assessment of Existing Waste Sites for Release (July 2026) paper. These sites are the same sites put forward at Regulation 18, when the Mayor made it clear that their loss without compensatory capacity would likely raise a general conformity issue.<br><br>[Table of sites : Hounslow – Unit 8 Initial Washrooms, Service Centre, TW8 9EZ (waste transfer; apportioned waste 2,156 tpa, hazardous 1,094 tpa); OPDC – Atlas Wharf, Atlas Road, NW10 6DN (permit: none; 65,382 tpa) and 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 tpa, C&D 143,976 tpa)]<br>While it is acknowledged that the draft WLWP assessment illustrates a surplus capacity for apportioned waste once these sites are 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 | | Note support for the release of the Quattro Victoria Road site.<br><br>The response to comments on the Regulation 18 Plan and the Assessment of Existing Waste Sites for Release document set out the rationale for the release of all six sites and demonstrates that identified waste needs will still be met. |

| Rep No. | Respondent name | Organisation (if given) | Part(s) of Plan responding to | Do you consider the Plan to be: | | Summary of issue(s) raised in representation | Modification(s) considered necessary by representor | WLLPAs' response |
|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | uses where waste processing capacity is re-provided elsewhere within London, based on the maximum achievable throughput achieved over the last five years.<br>The Mayor is concerned that this approach to releasing sites without reprovision elsewhere within London could impact on achieving key aims of Policies SI8 and SI9, including ensuring net self-sufficiency and optimising the capacity of existing sites.<br>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. | | |
| | | | | | | | | |
| 25.1 | Irene Man | Old Oak and Park Royal | Appendix 6 | Yes | Yes | Comments submitted on behalf of the OPDC Delivery Team. | | Noted and support welcomed. |

| Rep No. | Respondent name | Organisation (if given) | Part(s) of Plan responding to | Do you consider the Plan to be: | | Summary of issue(s) raised in representation | Modification(s) considered necessary by representor | WLLPAs' response |
|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | Development Corporation (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 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.<br>The Delivery Team is supportive of the Plan's proposal to release the Atlas Wharf, Atlas Road and Formerly Quattro, Victoria Road sites from safeguarding as identified in Appendix 6.<br>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.<br>The release of these sites is fundamental to enable the comprehensive mixed-use regeneration of Old Oak. | | |
| | | | Appendix 6 | | | See also Rep No. 01.1 (British Land) under Appendix 2, which | | |

| Rep No. | Respondent name | Organisation (if given) | Part(s) of Plan responding to | Do you consider the Plan to be: | | Summary of issue(s) raised in representation | Modification(s) considered necessary by representor | WLLPAs' response |
|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/ No) | | | |
| | | | | | | seeks the addition of site B12 to the sites proposed for release. | | |
| | | | Appendix 6 | | | See also Rep No. 19.10 (London Parks & Gardens) under Appendix 2, which supports release of site B02. | | |

**Table A4.2: Representations on the Integrated Impact Assessment**

| Rep No. | Respondent name | Organisation (if given) | Part(s) of document responding to | Do you consider the Plan to be: | | Reason(s) for representation | Modification(s) considered necessary by representor | WLLPAs' response |
|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/No) | | | |
| **Integrated Impact Assessment** | | | | | | | | |
| 05.5 | Christian Smith, GP Planning Ltd (agent) | Envar Composting Ltd | IIA Report (Regulation 19, LUC May 2026) pp.86–87, paragraph 4.13 – assessment of High View Farm promoted land | See 05.1 | See 05.1 | The response form identifies IIA pages 86–87, paragraph 4.13. The letter quotes the IIA conclusion: "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."<br>Envar objects to the non-inclusion of the promoted land; the land would provide "the potential for an increase in waste management capacity which will be required to meet future growth requirements" (full reasons recorded at 05.4). | None stated separately (see 05.4). | Noted. The role of the IIA is to provide an outline of the WLLPAs' reasons for discounting or selecting options. Paragraph 4.13 outlines the WLLPAs' reason for not including the High View Farm site for allocation in the WLWP, which is discussed in more detail in Appendix 3 of this Consultation Statement. |

| Rep No. | Respondent name | Organisation (if given) | Part(s) of document responding to | Do you consider the Plan to be: | | Reason(s) for representation | Modification(s) considered necessary by representor | WLLPAs' response |
|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/No) | | | |
| 13.2 | Simon Marsh | Herts & Middlesex Wildlife Trust | IIA Appendix E – Call for Sites Proposed Site 1, Broadwater Lake (not assessed) | See 13.1 | See 13.1 | 1. "We cannot find any reference to this site [Proposed Site 1, Broadwater Lake] in the Integrated Impact Assessment; Sites 2 and 3 are considered at Appendix E, but not Site 1." | None. | Noted. Para. 4.11 of IIA Report explains why Broadwater Lake (Site 1) was not assessed in the IIA, as it was not considered to be a reasonable alternative due to the recent planning permission granted for an alternative use (outdoor activity centre). |
| 19.19 | Philip Barnes | London Parks & Gardens (London Historic Parks & Gardens Trust) | Integrated Impact Assessment; Plan policies generally | No | No | 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.<br>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. | Noted. Not clear which part of the IIA Report is referred. Para. 5.131 of the IIA notes that although some potential minor negative effects have been identified for the WLWP policies included in the Regulation 19 plan, it is recognised that proposals for waste related development coming forward will also need to be in conformity with the development management policies in each LPA's Local Plans, as well as the London Plan, and the national decision-making policies in the NPPF. Therefore, in order to avoid duplicating requirements in relation to issues such as biodiversity protection and enhancement, use of green infrastructure and SuDS, protection and enhancement of the historic environment etc., the IIA does not have any further recommendations to make for the updated WLWP policies. |

| Rep No. | Respondent name | Organisation (if given) | Part(s) of document responding to | Do you consider the Plan to be: | | Reason(s) for representation | Modification(s) considered necessary by representor | WLLPAs' response |
|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/No) | | | |
| 48.2 | Mohamed Hanafy | | IIA – reasonable alternatives | Yes | No | The IIA appears to assess the impacts of the proposed WLWP approach, but does not give sufficient consideration to alternative waste management strategies.<br>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.<br>Such an assessment should consider:<br>- the environmental impact of transporting waste longer distances, including the potential use of rail freight;<br>- whether larger facilities could provide improved efficiency, resource recovery and reduced operational impacts;<br>- the opportunity cost of using scarce London industrial land for waste management instead of housing, employment and other strategic uses;<br>- the potential economic and regeneration benefits of locating some facilities in areas with greater land availability.<br>Without a transparent comparison of these reasonable alternatives, it is difficult to conclude that the proposed strategy represents the most sustainable option. | See Rep 48.1. | Noted. Chapter 4 of the IIA outlines the reasonable alternatives considered for the WLWP. Issues 1a and 1b addressed the approach to the spatial strategy, and Issue 1b, Option 2 focused on using facilities outside the Plan area. This was assessed in the IIA, in Appendix E. |

| Rep No. | Respondent name | Organisation (if given) | Part(s) of document responding to | Do you consider the Plan to be: | | Reason(s) for representation | Modification(s) considered necessary by representor | WLLPAs' response |
|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/No) | | | |
| 49.4 | Victoria Hollertz | | IIA Non-Technical Summary, page 24, paragraphs 1.52–1.53; Table 4; | No | No | Concern is corroborated by the Plan's own evidence base. The IIA 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.<br><br>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. | Please see 49.1. | Noted. The<br>IIA has informed and influenced the development of the Plan so as to avoid, and if necessary mitigate, negative impacts that might occur. By adopting this approach, the IIA aims to maximise the Plan's contribution toward sustainable development. WLWP4 sets out the need to avoid unacceptable adverse impacts including vermin. The wider Development Plan also includes policies to protect amenity. |
| 14.2 | Greer Dewdney | Historic England | IIA paragraph 3.40 | | | The plan makes little reference to either the historic environment in general, or archaeology | | Noted. Please see response under 14.1. |

| Rep No. | Respondent name | Organisation (if given) | Part(s) of document responding to | Do you consider the Plan to be: | | Reason(s) for representation | Modification(s) considered necessary by representor | WLLPAs' response |
|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/No) | | | |
| | | | | | | 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. | | |

**Table A4.3: Representations on the Habitats Regulations Assessment**

| Rep No. | Respondent name | Organisation (if given) | Part(s) of document responding to | Do you consider the Plan to be: | | Reason(s) for representation | Modification(s) considered necessary by representor | WLLPAs' response |
|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/No) | | | |
| **Habitats Regulations Assessment** | | | | | | | | |
| 35.6 | Laura Waters | Spelthorne Borough Council | Habitats Regulations Assessment | Yes | Yes | See Rep No. 35.5 (Spelthorne BC) under Policy WLWP 4: The Council supports the emphasis placed on environmental protection but considers there is scope for greater recognition of | 1. None stated separately (see 35.5). | Reference to HRA findings noted. |

| Rep No. | Respondent name | Organisation (if given) | Part(s) of document responding to | Do you consider the Plan to be: | | Reason(s) for representation | Modification(s) considered necessary by representor | WLLPAs' response |
|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/No) | | | |
| | | | | | | 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. | | |

# Appendix 5: Late representation received to Reg 19 consultation

One late representation dated the 9th October 2026 was received from Natural England.

**Table A5.1: Late representation**

| Rep No. | Respondent name | Organisation (if given) | Part(s) of document responding to | Do you consider the Plan to be: | | Reason(s) for representation | Modification(s) considered necessary by representor | WLLPAs' response |
|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/No) | | | |
| **Habitats Regulations Assessment** | | | | | | | | |
| 63.1 | Piotr Behnke | Natural England | Whole Plan | Yes | Yes | Natural England are broadly supportive of the Plan and do not raise any fundamental concerns regarding legal compliance or soundness. Where comments are provided these are intended to strengthen the effectiveness of the plan and to provide additional | | Noted and support welcomed. |

| Rep No. | Respondent name | Organisation (if given) | Part(s) of document responding to | Do you consider the Plan to be: | | Reason(s) for representation | Modification(s) considered necessary by representor | WLLPAs' response |
|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/No) | | | |
| | | | | | | certainty regarding the protection and recovery of the natural environment. | | |
| 63.2 | Piotr Behnke | Natural England | Habitats Regulations Assessment | Yes | Yes | Natural England welcomes the preparation of the HRA and the assessment of potential impact pathways affecting Habitats Sites within and beyond the Plan area.<br><br>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.<br><br>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. | | Noted and support for the HRA approach welcomed. Both the IIA and HRA recognise that any proposals for waste related development coming forward will also need to be in conformity with the whole development plan, i.e. the development management policies in each LPA's Local Plans, as well as the London Plan, and the national decision-making policies in the NPPF. Therefore, in order to avoid duplicating requirements in relation to issues such as biodiversity protection and enhancement, the IIA and HRA did not have any further recommendations to make for the WLWP policies. |

| Rep No. | Respondent name | Organisation (if given) | Part(s) of document responding to | Do you consider the Plan to be: | | Reason(s) for representation | Modification(s) considered necessary by representor | WLLPAs' response |
|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/No) | | | |
| 63.3 | Piotr Behnke | Natural England | Habitats Regulations Assessment | Yes | Yes | 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.<br><br>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.<br><br>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. | | Noted and support for the HRA approach welcomed. Both the IIA and HRA recognise that any proposals for waste related development coming forward will also need to be in conformity with the whole development plan, i.e. the development management policies in each LPA's Local Plans, as well as the London Plan, and the national decision-making policies in the NPPF. Therefore, in order to avoid duplicating requirements in relation to issues such as biodiversity protection and enhancement, the IIA and HRA did not have any further recommendations to make for the WLWP policies. |
| 63.4 | Piotr Behnke | Natural England | Habitats Regulations Assessment | Yes | Yes | Designated Sites - Natural England welcomes the Plan's recognition of biodiversity and environmental protection.<br>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 | | Noted and support for the HRA approach welcomed. Both the IIA and HRA recognise that any proposals for waste related development coming forward will also need to be in conformity with the whole development plan, i.e. the development management policies in each LPA's Local Plans, as well as the London Plan, and the national |

| Rep No. | Respondent name | Organisation (if given) | Part(s) of document responding to | Do you consider the Plan to be: | | Reason(s) for representation | Modification(s) considered necessary by representor | WLLPAs' response |
|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/No) | | | |
| | | | | | | improve clarity and assist in demonstrating consistency with national policy.<br><br>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. | | decision-making policies in the NPPF. Therefore, in order to avoid duplicating requirements in relation to issues such as biodiversity protection and enhancement, the IIA and HRA did not have any further recommendations to make for the WLWP policies. |
| 63.5 | Piotr Behnke | Natural England | Habitats Regulations Assessment | Yes | Yes | Nature Recovery - Natural England's strategic priorities place increasing emphasis on nature recovery, environmental enhancement and the creation of resilient ecological networks.<br><br>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.<br><br>This may assist in ensuring that opportunities for habitat enhancement, ecological connectivity and biodiversity recovery associated with waste development are fully realised where appropriate. | | Noted and support for the HRA approach welcomed. Both the IIA and HRA recognise that any proposals for waste related development coming forward will also need to be in conformity with the whole development plan, i.e. the development management policies in each LPA's Local Plans, as well as the London Plan, and the national decision-making policies in the NPPF. Therefore, in order to avoid duplicating requirements in relation to issues such as biodiversity protection and enhancement, the IIA and HRA did not have any further recommendations to make for the WLWP policies. |

| Rep No. | Respondent name | Organisation (if given) | Part(s) of document responding to | Do you consider the Plan to be: | | Reason(s) for representation | Modification(s) considered necessary by representor | WLLPAs' response |
|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/No) | | | |
| 63.6 | Piotr Behnke | Natural England | Habitats Regulations Assessment | Yes | Yes | Restoration and Recovery Schemes - Natural England welcomes the Plan's recognition of environmental restoration and enhancement opportunities associated with land recovery and restoration proposals.<br><br>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.<br><br>The supporting text could encourage restoration proposals, where appropriate, to contribute towards wider nature recovery objectives and biodiversity enhancement. | | Noted and support for the HRA approach welcomed. Both the IIA and HRA recognise that any proposals for waste related development coming forward will also need to be in conformity with the whole development plan, i.e. the development management policies in each LPA's Local Plans, as well as the London Plan, and the national decision-making policies in the NPPF. Therefore, in order to avoid duplicating requirements in relation to issues such as biodiversity protection and enhancement, the IIA and HRA did not have any further recommendations to make for the WLWP policies. |
| 63.7 | Piotr Behnke | Natural England | Habitats Regulations Assessment | Yes | Yes | Air Quality - Natural England notes the consideration of air quality impact pathways within the Habitats Regulations Assessment.<br><br>Matters relating to air quality are generally addressed through existing regulatory processes and relevant environmental assessment requirements. We therefore have no specific | | Noted. |

| Rep No. | Respondent name | Organisation (if given) | Part(s) of document responding to | Do you consider the Plan to be: | | Reason(s) for representation | Modification(s) considered necessary by representor | WLLPAs' response |
|---|---|---|---|---|---|---|---|---|
| | | | | Legally compliant (Yes/No) | Sound (Yes/No) | | | |
| | | | | | | comments on air quality impacts at this strategic plan stage. | | |
| 63.8 | Piotr Behnke | Natural England | Habitats Regulations Assessment | Yes | Yes | Water Environment - Natural England welcomes the HRA's consideration of water quality and hydrological impact pathways.<br><br>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.<br><br>This would assist in ensuring that the Plan remains effective and consistent with environmental legislation and national policy requirements. | | Noted and support for the HRA approach welcomed. Both the IIA and HRA recognise that any proposals for waste related development coming forward will also need to be in conformity with the whole development plan, i.e. the development management policies in each LPA's Local Plans, as well as the London Plan, and the national decision-making policies in the NPPF. Therefore, in order to avoid duplicating requirements in relation to issues such as biodiversity protection and enhancement, the IIA and HRA did not have any further recommendations to make for the WLWP policies. |

# Appendix 6: Schedule of representations received to Reg 19 consultation

This Appendix is available in a separate document.