



Integrated Impact Assessment

Non-Technical Summary

Proposed Submission West London Waste Plan

West London Waste Planning Authorities

Final report

Prepared by LUC

July 2026

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Introduction

1.1 LUC was commissioned to undertake an Integrated Impact Assessment (IIA) of the new West London Waste Plan (WLWP). The WLWP area is formed by the six west London Boroughs: Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames and also includes the area within Brent and Ealing covered by the Old Oak and Park Royal Development Corporation (OPDC). IIA is an assessment process designed to identify the likely significant effects of a plan on environmental, social and economic factors and ways of minimising its negative effects and maximising its positive effects. So that it can best influence the plan, the IIA process runs alongside the plan-making process, considering and informing alternatives and opportunities for mitigation. The IIA also documents the ‘story’ of the plan – why the plan is the way it is (and not something else).

1.2 The new WLWP will cover the period to 2041 and will provide the local waste planning policy framework for the WLWP area. Alongside the London Plan and the relevant local plans it forms the development plan against which applications for waste related development will be determined. The current version of the WLWP was adopted in 2015. There have been two iterations of the London Plan since adoption of the WLWP: the London Plan (2016), and the current adopted London Plan (2021). A new version of the Draft London Plan (2026) has been published for consultation in July 2026.

1.3 The WLWP is not prepared in isolation and must align with national planning policy and be in general conformity with the London Plan. It is supported by other evidence base documents including the Strategic Flood Risk Assessment Report; 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; and Waste Management in West London Topic Paper.

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1.4 This report is the Non-Technical Summary of the IIA Report for the Proposed Submission West London Waste Plan.

1.5 The IIA includes a number of types of assessment:

- Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) – which consider environmental, social and economic effects of the plan.
- Health Impact Assessment (HIA) – focussing on public health effects.
- Equality Impact Assessment (EqIA) – considering equalities issues and avoidance of discrimination against the nine protected groups in the Equality Act 2010, such as older people and disabled people.
- Habitats Regulations Assessment (HRA) – considering the impacts on designated Habitat Sites.

1.6 The IIA process has followed the stages of SA/SEA set out in government guidance that need to be undertaken alongside Local Plan preparation:

- Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope of the IIA.
- Stage B: Developing and refining options and assessing effects.
- Stage C: Preparing the IIA Report.
- Stage D: Consulting on the Local Plan and the IIA Report.
- Stage E: Monitoring the significant environmental effects of implementing the Local Plan.

Stage A: Scoping

1.7 The IIA began with a ‘Scoping’ process. This brought together information about current and emerging conditions and issues relating to waste management in the WLWP area that the WLWP could try to address. It also establishes what higher level policy such as the London Plan and national planning policy say the WLWP must or should aim to do.

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1.8 The information about existing issues and external policy requirements was used to develop a set of environmental and sustainability objectives (known as the IIA framework) against which the likely effects of the WLWP, including reasonable alternatives, have been assessed.

Baseline Information

1.9 Baseline information provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps to identify key sustainability issues. In line with the requirements of the SEA Regulations, consideration has been given to the current state of the environment in west London. Detailed baseline information is presented in Appendix C of the IIA Report. As well as environmental issues, the baseline information includes a description of social and economic context in west London to help inform the wider sustainability appraisal, health and equality impact assessments that are part of the IIA.

1.10 The baseline information contributed to the identification of a set of key sustainability issues for the area, which in turn were used to develop the IIA framework. The key sustainability issues identified for west London are set out below. In line with a specific requirement of the SEA Regulations, the IIA considers 'the likely evolution of the environment' if the WLWP were not to be implemented. The IIA Report sets out more detailed considerations of the 'likely evolution without the plan' for each of the key issues listed below.

Key Sustainability Issues

1.11 Key sustainability issues for the new WLWP were identified through the preparation of the IIA Scoping Report in June 2025. The key issues identified through the analysis of the baseline, policy context and consultations on the Scoping Report are summarised below.

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1.12 The analysis below shows that, in general, the current trends in relation to the various social, economic and environmental issues affecting west London would be more likely to continue without the implementation of the WLWP.

Waste

1.13 The WLWP evidence indicates:

- Sufficient capacity is expected at existing west London waste sites to manage forecast waste arisings in accordance with the Plan's strategic objectives.
- No additional sites are expected to be needed to accommodate new waste facilities.
- Existing sites may offer redevelopment opportunities to increase capacity (although such redevelopment is not essential for the Plan's objectives to be met).
- If applications for new capacity come forward there may be future opportunities to improve rail or water-based waste transport.
- Without the Proposed Submission WLWP, the adopted WLWP already includes clause WLWP4d relating to consideration of transportation of waste by modes other than road. However, as it becomes more out of date, in the absence of a new WLWP these opportunities could be missed.

Climate change adaptation and mitigation

1.14 Extreme weather and flood events are increasingly more common. The WLWP may provide opportunities to help mitigate and reduce the causes of climate change and also adapt to climate change impacts:

- WLWP can support emissions reductions via energy efficient measures in facilities and low or zero emission transport modes for waste collection (see the section on transport).

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- Promoting green infrastructure within any redevelopment of waste sites.
- Encouraging flood and heat resilient design on waste site redevelopment.
- Promoting on-site biodiversity net-gain and sustainable drainage systems (SuDS), and links to green infrastructure for flood retention, shading and air quality improvements.

Population, health and wellbeing

1.15 The key issues and opportunities that the WLWP provides are:

- Population and housing growth may increase waste arisings (depending on residents' behaviours with respect to waste) and pressure on waste sites. Younger (0 to 15) and older (over 65) age groups are forecast to grow the most.
- Safeguarding and modernising existing waste facilities is important to reduce amenity impacts and futureproof the existing waste site estate.
- The provision of local waste sites through the WLWP may help reduce illegal waste sites and fly-tipping giving waste enforcement authorities greater control.
- Deprivation, socio-economic conditions, and protected group demographics are unlikely to be significantly affected by the WLWP, though inequalities and low recycling participation are expected to persist due to factors beyond the control of the WLWP.

Economy

1.16 The existing inequalities and higher unemployment rates in some areas could be improved by the WLWP as it could contribute towards:

- Supporting diversity and quality of local jobs, skills, and investment in training in deprived areas.
- Potential benefits through modernisation of existing local waste facilities.

Transport

1.17 The existing congestion on key highways is likely to worsen with growth within the WLWP area and impact economic productivity, increase air and noise pollution and therefore adversely affect health. The WLWP provides opportunities to reduce transport impacts where applications for new capacity come forward including:

- Promoting and prioritising sustainable travel.
- Supporting the provision of electric vehicle infrastructure at waste sites.

Historic Environment

1.18 Without the WLWP, the designated and undesignated heritage assets and areas of cultural and historical interest in the WLWP area, could be at risk from poorly located development design or climate change, and undesignated assets will not be protected (as they do not benefit from statutory protection). The WLWP provides opportunity to continue to protect these assets through:

- The criteria set out in the Proposed Submission WLWP policies.
- Strengthening design requirements to minimise impacts on the historic environment.

Landscape and townscape

1.19 West London's more rural landscapes and townscapes are sensitive to adverse effects from urban intensification, increasing recreational pressures and seasonal climate change. The WLWP provides an opportunity to:

- Protect and enhance areas by ensuring the design of any new or redeveloped existing waste facilities is sympathetic to the surrounding area.

Biodiversity and Geodiversity

1.20 There are many sites and networks designated in the WLWP area for ecological significance. These areas face a number of challenges relating to pollution and habitat degradation. There is a need to protect these areas and the WLWP provides an opportunity for:

- Protection, strengthening and management of habitats, including for those sites / networks outside designations.
- Safeguard site and biodiversity network sensitivities in new/redeveloped waste sites.
- Important habitats and sites that are not covered in the WLWP will continue to receive protection in Local Plan policies.

Air, land and water quality

1.21 Without the WLWP, there is a risk of unnecessary sterilisation of mineral and soil resources and unplanned development for waste in areas where water bodies are protected and sensitive to water quality changes from run off or spills from waste facilities. Air pollution is also a major issue linked to the area's road network and from the emissions associated with Heathrow Airport and this could worsen with new waste developments. The WLWP provides:

- Opportunities to promote sustainable drainage systems and grey water recycling, support water efficiency and protect sensitive areas.
- Opportunities to support sustainable low-emission alternatives for road based transport.

IIA Framework

1.22 As described in the Methodology chapter of the IIA Report (Chapter 2), the relevant objectives of international and national plans, policies, and

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programmes and the key sustainability issues identified by the baseline review informed development of a framework of sustainability objectives, the IIA framework, against which the vision, strategic objectives and proposed policies of the new WLWP was assessed. For each of the sustainability objectives, a number of appraisal questions are included to act as prompts when considering the potential effects of the new WLWP in relation to that objective. These questions are set out in Chapter 3 of the main IIA Report.

1.23 The IIA framework is presented below:

- IIA objective 1: Minimise the WLWP's contribution to climate change and promote climate resilient infrastructure.
- IIA objective 2: Move treatment of waste up the Waste Hierarchy.
- IIA objective 3: Support, maintain and enhance the development of an inclusive economy.
- IIA objective 4: Protect and improve people's health.
- IIA objective 5: Manage waste close to the source and promote sustainable modes of transport.
- IIA objective 6: Protect and enhance the historic environment.
- IIA objective 7: Protect, enhance, restore, and expand biodiversity and geodiversity assets.
- IIA objective 8: Protect, enhance, and restore townscapes including open spaces.
- IIA objective 9: Protect and enhance the quality and quantity of watercourses and water bodies and maximise the efficient use of water.
- IIA objective 10: Manage and reduce flood risk from all sources.
- IIA objective 11: Minimise noise, vibration, odour, light and air pollution relating to waste development.
- IIA objective 12: Protect and enhance mineral resources and soils.

Use of the IIA Framework

1.24 Each option and policy included in the new WLWP has been appraised and a judgement made as to its likely effect on the baseline in relation to the achievement of the sustainability objectives set out in the IIA framework presented above. The symbols and colour-coding shown in Table 1 have been used to show whether the effects of the WLWP in relation to each IIA objective are likely to be positive or negative, minor or significant, or uncertain.

1.25 Mixed effects were recorded for an IIA objective where there was potential for positive effects in relation to one aspect of the objective but potential for negative effects in relation to another. Where there was a considerable degree of uncertainty about the likelihood of the effect materialising, a question mark (?) was added to the score to indicate that there is uncertainty attached to the effect.

Table 1: IIA effects symbols

Symbol	Effect
++	Significant positive effect likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect likely
+/-	Mixed minor effects likely
++/--	Mixed significant effects likely
-	Minor negative effect likely
--/+	Mixed significant negative and minor positive effects likely

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Symbol	Effect
--	Significant negative effect likely
0	Negligible effect likely
?	Likely effect uncertain
N/A	Not applicable or relevant

Stage B: Identifying and appraising alternatives

1.26 As explained in Chapter 2 of the IIA Report, an important part of the IIA process is to assess 'reasonable alternatives' to what the WLWP is proposing. In particular, the IIA sets out:

- How reasonable alternatives were identified.
- The assessment results of these alternatives.
- Why the preferred alternatives have been chosen and others rejected.

1.27 The IIA of alternatives (or options) aims to inform the aspects of the WLWP that address the waste planning issues facing the plan area and where clear alternative approaches to addressing these issues exist.

Alternative policy approaches

1.28 A set of key strategic issues to be addressed by the new WLWP were identified in relation to the new WLWP strategic objectives. The issues were identified by the plan-makers as those matters which may act as barriers to the achievement of the draft vision and strategic objectives for the new WLWP, whose formulation was informed by a review of national, regional, and local

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policies and strategies. The issues also took account of the spatial and economic context within the WLWP area. A number of alternative policy approach options were identified for each issue, and these are described in full in Chapter 4 of the IIA Report.

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

1.30 The options were not mutually exclusive, and some of the options were combined and addressed in one policy, or addressed in elements of more than one policy. Where an option was addressed in one or more of the draft policies, the relevant WLWP policy/ies was identified. Deliverable approaches not taken forward in the draft policies were considered as 'reasonable alternatives' and assessed through the IIA.

1.31 Four reasonable alternative policy approaches that were not taken forward in the WLWP were assessed:

- Issue 1a, Option 3: Identify Areas of Search or site allocations for waste use (reasonable alternative to Policy WLWP1 and WLWP2)
- Issue 1b, Option 2: Continue to utilise facilities outside Plan area for management of residual waste (reasonable alternative to elements of Policy WLWP1, WLWP2, WLWP3 and WLWP5)
- Issue 1b, Option 3: Drive residual waste reduction to minimise exports (This approach is partially addressed by elements of Policy WLWP5 and WLWP6, although they do not set specific targets. Setting ambitious targets is therefore a reasonable alternative to Policy WLWP5 and WLWP6)
- Issue 4b, Option 2: Require landscaping and protection and enhancement of biodiversity at existing waste sites (reasonable alternative to elements of Policy WLWP4)

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1.32 Table 2 below sets out the likely effects of the reasonable alternative policy approaches. The reasoning for the likely effects for each IIA objective is set out in Appendix E of the IIA Report.

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Table 2: Summary of IIA findings for the reasonable alternative policy approaches to those taken in the new WLWP

IIA Objectives	Issue 1a, Option 3 Areas of Search or site allocations	Issue 1b, Option 2 External residual waste facilities	Issue 1b, Option 3 Ambitious targets for waste reduction	Issue 4b, Option 2 Landscaping and biodiversity
IIA1: Climate change mitigation	+	+/-	+	0
IIA2: Waste hierarchy	++	-	++	0
IIA3: Economy	+	-	+	+/-
IIA4: Health and wellbeing	+	0	0	+
IIA5: Sustainable transport	+	-	+	0
IIA6: Historic environment	0?	0	0	0
IIA7: Biodiversity and geodiversity	0?	0	0	+
IIA8: Open spaces and townscapes	0?	0	0	+
IIA9: Water	0?	0	0	+

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IIA Objectives	Issue 1a, Option 3 Areas of Search or site allocations	Issue 1b, Option 2 External residual waste facilities	Issue 1b, Option 3 Ambitious targets for waste reduction	Issue 4b, Option 2 Landscaping and biodiversity
IIA10: Flooding	0?	0	0	+
IIA11: Noise, light and air pollution	+	-	+/-	+
IIA12: Mineral resources and Soils	+/-	0	0	+

Safeguarding existing waste sites

1.33 Although not identified in the options above while drafting the policies in the Proposed Submission WLWP, the West London Waste Planning Authorities did consider different options for safeguarding existing waste sites, including the release of some of the sites safeguarded under the London Plan (and some currently safeguarded through the adopted WLWP) for uses other than waste.

1.34 In terms of the approach to identifying the existing waste sites proposed to be safeguarded in the new WLWP, a number of reasonable alternatives were identified:

- Safeguarding all sites that have planning permission for waste use or an environmental permit (as per the definition in the London Plan). This includes sites that are subject to an environmental permit but have no planning permission.
 - This is partly addressed by Policy WLWP1, which safeguards existing sites with planning permission for waste use, but not sites that are only subject to an environmental permit (see below).
- Safeguarding all sites lawful under land-use planning including those subject to Certificate of Lawful Existing Use or Development (CLEUD) for a waste use, or deemed lawful over time in planning terms.
 - This approach is addressed by Policy WLWP1.
- Safeguarding sites that are only subject to an environmental permit for waste use but are not considered lawful under planning legislation.
 - This was not considered a reasonable alternative as while such sites benefit from an Environmental Permit issued by the Environment Agency for waste-related operations, this relates to pollution control only and does not mean that the site will have been subject to proper assessment through the planning application process to determine the suitability of the use of the land itself.

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- Release some safeguarded sites to enable re-development for non-waste uses (provided capacity of the remaining existing safeguarded waste sites is surplus to requirement for London as a whole over the Plan period to be net self sufficient).
- This approach is addressed by elements of Policy WLWP1.

1.35 The likely effects of safeguarding existing sites that have planning permission for waste use, a CLEUD for a waste use, or are deemed lawful in planning terms have been assessed and described in relation to Policy WLWP1. Similarly, the potential release of some safeguarded sites for re-development for non-waste uses has been assessed in the IIA of the WLWP. However, the effects of releasing safeguarded sites and their subsequent redevelopment for non-waste uses (e.g. housing, mixed use, other employment uses) has not been assessed in the IIA. While any ongoing effects of the waste use on those sites will cease, new effects from construction of different development types may occur, but the effects of that new development will be assessed through the individual waste planning authorities' Local Plan IIA process.

Potential waste site options

1.36 Although land to accommodate additional waste development does not need to be allocated in the new WLWP due to there being sufficient capacity available in existing waste facilities, the Regulation 18 consultation for the new WLWP did provide an opportunity for organisations to respond and put forward a site for a specific waste management development through a 'Call for Sites' exercise.

1.37 Three sites were nominated under the Call for Sites as follows:

- Broadwater Lake, Tarmac (LB Hillingdon). The call for sites response was seeking to allocate the site as a waste management development to infill the former quarry with non-hazardous excavation waste and create new habitats at the lake.

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- High View Farm, Envar Composting (LB Hillingdon). The site is already in existing operation. The call for sites response was seeking to increase the site footprint subject to safeguarding and that might accommodate expansion of the existing open air green waste composting by adding several parcels of land adjacent to the northern section of the existing site boundary .
- McGovern Plant/The Wet Waste Company (LB Hounslow). The site is already in existing waste use and subject to an environmental permit but does not benefit from planning consent. The call for sites response was seeking to ensure that the existing waste use (which does not currently benefit from planning consent) is referenced and afforded protection within the WLWP as a safeguarded site.

1.38 Of the three sites, only two were assessed as reasonable alternative waste site options. These were High View Farm in Hillingdon and McGovern Plant/Wet Waste Site in Hounslow. The Broadwater Lake site in Hillingdon was discounted by the waste planning authorities, as a separate planning application was already in progress for the redevelopment of the site to create an outdoor activity centre and so the site is unlikely to be available due to the proposed use, given permission for it was granted during the assessment process.

1.39 The two site options were assessed in line with the IIA site assessment criteria set out in Appendix D of the IIA Report, and the IIA findings are presented in Appendix E of the IIA Report. The summary of effects of the potential waste site options is provided below.

High View Farm Site

1.40 Positive effects were identified for IIA Objective 2: Waste Hierarchy as the High View Farm site is a recycling and composting facility which is higher up the waste hierarchy than landfill and will therefore contribute to the circular economy. IIA objective 3: Economy is also expected to result in positive effects due to the potential employment opportunities that may arise from the extended waste management activities. However, all the positive effects were assessed

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to be uncertain as much of the conclusions depend on the final design and layout of the operations, which is not confirmed at this stage.

1.41 Negative effects were identified for the High View Farm site in relation to IIA objective 4: Health and Wellbeing, due to the potential for effects on more deprived areas in proximity, as well as the effect on nearby recreation users from the potential release of odours and noise. IIA objective 6: Historic Environment and IIA objective 7: Biodiversity and Geodiversity are also expected to have negative effects due to the potential for the waste operations to impact the setting of the historic assets or local ecosystems. The location of the site close to source protection zones, flood risk zones and on higher grade agricultural land means negative effects have been identified for IIA objective 9: Water, IIA objective 10: Flooding and IIA objective 12: Mineral resources and soils. Additionally, negative effects are expected for IIA objective 5: Sustainable transport due to the site being located far from rail or other sustainable transport methods, therefore the site is not likely to reduce reliance on road freight.

1.42 Negligible effects were found for the High View Farm site in relation to IIA objective 1: Climate change mitigation, IIA objective 8: Open spaces and townscapes, IIA objective 11: Noise, light and air pollution.

McGovern Plant/Wet Waste Site

1.43 Positive effects were identified for IIA objective 2: Waste hierarchy, IIA objective 3: Economy and IIA objective 12: Mineral resources and soils, with regards to McGovern Plant/Wet Waste site. This is because the site is operational and provides waste management higher up the waste hierarchy than landfill, creates raw materials for further use and is not located on high grade agricultural land, respectively.

1.44 Negative effects are expected for the McGovern Plant/Wet Waste site for IIA objective 4: Health and Wellbeing and IIA objective 11: Noise, light and air pollution. This is due to the location of the site in an area that affects vulnerable populations and users of recreational facilities, and impacts on local amenities

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through releasing odour, noise, vibration and light from the facility. IIA objective 7: Biodiversity and Geodiversity is also expected to receive negative effects, as the site adjoins a Site of Important Nature Conservation and is adjacent to the River Crane. The site therefore has the potential to adversely affect these biodiversity assets. Negative effects are also expected for IIA objective 5: Sustainable transport, because the site is not located close to provisions of sustainable transport methods. However, it is noted that the site is already in existing waste use so these effects would not change or increase.

1.45 Negligible effects are likely for IIA objective 1: climate change mitigation, IIA objective 8: Open spaces and townscapes, IIA objective 9: Water, IIA and IIA objective 10: Flooding.

1.46 Upon detailed review of the proposed site options, the waste planning authorities discounted all three site options proposed through the Call for Sites exercise. For the latter two site options (High View Farm and The Wet Waste Company), the waste planning authorities determined that the inclusion of each site for allocation was neither necessary or justified. With respect to the High View Farm site, this was based on the conclusion that given the lack of additional capacity being proposed and the lack of an identified shortfall in capacity in the new WLWP for the management of apportioned waste, the allocation of the additional land was not necessary or justified. The Wet Waste site is currently operational subject to an environmental permit but the site requires a retrospective planning application for regularisation. It was concluded that the site was not necessary or justified as the primary intent of the nomination related to the site being safeguarded which would only be achieved should planning permission be granted following an application for regularisation being submitted. Therefore, the three site options proposed in the Call for Sites exercise have not been allocated in the new WLWP. Full details of the waste planning authorities' reasons are provided in the supporting documents to the Proposed Submission WLWP.

Stage C: Reporting

1.47 The IIA Report describes the process that has been undertaken to date in carrying out the IIA of the WLWP. It sets out the IIA findings for the policies in the Proposed Submission WLWP consultation document, as well as the reasonable alternatives considered. Likely significant effects, both positive and negative, have been presented, taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects where relevant. The IIA findings are summarised below.

IIA findings for the WLWP Vision, Strategic Objectives and Policies

1.48 Chapter 5 in the IIA Report sets out the detailed description of the IIA effects of the WLWP Vision, Strategic Objectives and Policies. Tables 3 and 4 below provide a visual summary of the effects identified through the use of colour-coded symbols (which are explained above under the heading 'IIA Framework').

Table 3: Summary of IIA findings for the WLWP Vision and Strategic Objectives

IIA Objectives	Overarching Vision	Strategic Objective 1: Make best use of existing waste infrastructure to manage waste efficiently	Strategic Objective 2: Encourage facilities that contribute to the achievement of a Circular Economy to come forward	Strategic Objective 3: Decarbonise Waste Transport and Processing	Strategic Objective 4: Deliver high quality waste facilities (protect and enhance the environment and communities)	Strategic Objective 5: Ensure sufficient capacity of the right type in the right place so that unavoidable residual waste produced is managed safely and effectively
IIA1: Climate change mitigation	++	+	+	++	+	+/-
IIA2: Waste hierarchy	++	++	++	++	0	-
IIA3: Economy	+	+	+	0	+	0
IIA4: Health and wellbeing	+	+	+	+	+	+
IIA5: Sustainable transport	++	+	+	++	0	+

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IIA Objectives	Overarching Vision	Strategic Objective 1: Make best use of existing waste infrastructure to manage waste efficiently	Strategic Objective 2: Encourage facilities that contribute to the achievement of a Circular Economy to come forward	Strategic Objective 3: Decarbonise Waste Transport and Processing	Strategic Objective 4: Deliver high quality waste facilities (protect and enhance the environment and communities)	Strategic Objective 5: Ensure sufficient capacity of the right type in the right place so that unavoidable residual waste produced is managed safely and effectively
IIA6: Historic environment	0	0	0	0	+	+
IIA7: Biodiversity and geodiversity	0	0	0	0	+	+
IIA8: Open spaces and townscapes	0	+	0	0	+	+
IIA9: Water	0	0	0	0	+	+
IIA10: Flooding	+	0	0	0	+	0
IIA11: Noise, light and air pollution	++	+	+	+	+	+
IIA12: Mineral resources and Soils	+	+	0	0	+	-

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Table 4: Summary of IIA findings for the Regulation 19 WLWP policies

IIA Objectives	Policy WLWP 1 – Safeguarding and Optimising the Waste Site Network	Policy WLWP 2 – Provision of additional Waste Management Capacity	Policy WLWP 3 – Residual Waste Management and Energy Recovery	Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities	Policy WLWP 5 – Recovery and Disposal of Waste to Land	Policy WLWP 6 – Circular Economy and Resource Efficiency	Policy WLWP 7 – Wastewater Infrastructure
IIA1: Climate change mitigation	+	+/-	+/-	++	+/-	+	+?
IIA2: Waste Hierarchy	++	++	+/-	+/-	+/-	++	+
IIA3: Economy	+	+	+	-	+?	+	+
IIA4: Health and wellbeing	+	+	+	++/-?	+?	+?	+
IIA5: Sustainable transport	+	+/-	+/-?	+	0	+	+
IIA6: Historic environment	0?	+/-?	-?	++/-?	+/-?	0	+/-?
IIA7: Biodiversity and geodiversity	0?	+/-?	-?	++/-?	+/-	0	+/-?

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IIA Objectives	Policy WLWP 1 – Safeguarding and Optimising the Waste Site Network	Policy WLWP 2 – Provision of additional Waste Management Capacity	Policy WLWP 3 – Residual Waste Management and Energy Recovery	Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities	Policy WLWP 5 – Recovery and Disposal of Waste to Land	Policy WLWP 6 – Circular Economy and Resource Efficiency	Policy WLWP 7 – Wastewater Infrastructure
IIA8: Open spaces and townscapes	0?	+/-?	-?	++/-?	+/-	+	+/-?
IIA9: Water	0?	+/-?	-?	+/-	+/-?	0	+
IIA10: Flooding	0?	+/-?	-?	+	+/-	0	+/-?
IIA11: Noise, light and air pollution	+	+/-?	+/-?	+	+/-	0	+/-?
IIA12: Mineral resources and Soils	+	+	-	+/-?	+	+	+/-

Equalities Impact Assessment, Health Impact Assessment

1.49 The EqlA and HIA criteria are embedded within the IIA objectives used to appraise the WLWP, as set out in Chapter 3 of the IIA Report, and the findings for IIA objectives 3, 4 and 11 are particularly relevant.

1.50 With regards to meeting the Public Sector Duty in the Equality Act 2010, which requires public authorities to have due regard for equalities considerations when exercising their functions, the potential impacts of the Proposed Submission WLWP are also described in a separate section within **Chapter 5**. A number of the waste planning authorities also recognise care experience and socio-economic status as protected characteristics. The vision, strategic objectives and policies for the new WLWP are likely to have a negligible effect on people with protected characteristics given their strategic nature, their focus on waste management issues, and as the plan does not allocate land for development. However, the WLWP does indirectly give consideration to the potential effects of waste development on specific groups, where there may be increased vulnerability to the effects of waste management facilities and processes, including air pollution, climate change, employment opportunities and social deprivation.

Habitats Regulations Assessment

1.51 The HRA was undertaken separately but the findings have been taken into account in the IIA where relevant (for example to inform judgements about the likely effects of potential development locations on biodiversity). The HRA will be published alongside the WLWP Regulation 19 consultation

1.52 The first stage of HRA was to screen for likely significant effects. Following the HRA screening, likely significant effects could not be ruled out in relation to a range of different potential impact pathways (physical damage and loss of

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habitat, non-physical disturbance, air pollution, pests and vermin, changes in water quantity/quality).

1.53 These potential impacts could arise from five of the WLWP's policies: WLWP 1, WLWP 2, WLWP 3, WLWP 5 and WLWP 7. However, the next stage of assessment, known as the Appropriate Assessment concluded that, with safeguards provided by policy WLWP 4 and other policies in the WLWP, the London Plan and relevant Local Plans, as well as environmental permitting requirements, adverse effects on the integrity of Habitats Sites will be avoided.

Cumulative effects

1.54 Cumulative effects are considered both in terms of the plan as a whole, and in relation to other plans or development in the plan area, and potentially outside of the plan area, depending on the potential impacts.

Total effects of the WLWP

1.55 The total effects of the vision, strategic objectives and policies in the Regulation 19 WLWP in relation to each of the IIA objectives are discussed below and summarised in Table 5.

Table 5: Total effects of the WLWP (Regulation 19) document

IIA objectives	Total effect
IIA1: Climate change mitigation	+
IIA2: Waste hierarchy	++
IIA3: Economy	+
IIA4: Health and wellbeing	+
IIA5: Sustainable transport	+

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IIA objectives	Total effect
IIA6: Historic environment	+/-?
IIA7: Biodiversity and geodiversity	+/-?
IIA8: Open spaces and townscapes	+/-?
IIA9: Water	+/-?
IIA10: Flooding	+/-?
IIA11: Noise, light and air pollution	+
IIA12: Mineral resources and Soils	+

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

1.56 The vision, strategic objectives and policies of the Proposed Submission WLWP have a mixture of significant and minor positive effects on this objective. This is in recognition of the WLWP's consistent focus on pursuing the sustainable location and management of waste in west London, minimising carbon emissions through on-site operations and the sustainable transportation of waste within and beyond the city. Overall, a minor positive effect is recorded for this objective.

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

1.57 The vision, strategic objectives and policies of the Proposed Submission WLWP have a mixture of significant and mixed minor positive and minor negative effects on this objective. This is in recognition of the WLWP's consistent focus on moving waste up the waste hierarchy and the safeguarding of existing facilities that contribute towards the strategic objectives of the WLWP being met. Therefore, overall, a significant positive effect is recorded for this objective.

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

1.58 The effects of the WLWP's vision, strategic objectives and policies on IIA3 will have an overall minor positive effect. This is in recognition of the Proposed Submission WLWP's continued emphasis on safeguarding and optimisation of existing waste sites within west London and the potential for new waste management facilities which would benefit the local economy with growth and job creation. The development of Circular Economy Hubs would also result in the creation of local jobs, further benefiting the local economy.

IIA objective 4: Protect and improve people's health

1.59 The effects on the WLWP's vision, strategic objectives and policies will have a mostly minor positive effect in relation to IIA4. Despite the potential for waste management activities to have some potential effects on people's health due to odour, noise or air pollutions for example, the WLWP strategic objectives and policies require a range of measures to be implemented to avoid adverse impacts from waste development on the environment including effects on health and well-being of local communities which results in the overall minor positive effect.

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

1.60 Overall, the WLWP is considered to have a minor positive effect on IIA5. The Vision and SO3 have significant positive effects on this objective. This is in recognition of their focus on pursuing the sustainable location and management of waste in west London, minimising travel through application of the proximity principle and encouraging the transportation of waste via more sustainable modes. The strategic objectives also seek to reduce the distance waste has to travel by co-locating waste facilities and establishing Circular Economy Hubs. The policies safeguard existing waste sites, managing waste close to the

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source (i.e. residents and employees in west London) thereby reducing the need to transport waste.

IIA objective 6: Protect and enhance the historic environment

1.61 The vision and most of the objectives will have a negligible effect on the historic environment as there are no specific references to the historic environment. The policies are generally considered to have an uncertain effect on IIA 6 with a mix of positive and minor negative effects as any effects will depend on the location of any development that comes forward. The WLWP requires any new waste developments or redevelopments to be designed and operated to the highest practicable standards of environmental protection and contribute positively to the local area, which may include the historic environment. Consequently, overall the WLWP is considered to have an uncertain but mixed minor positive and minor negative effect on IIA6.

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

1.62 The vision, most of the objectives and some of the policies will have a negligible or uncertain negligible effect on IIA 7. Strategic objectives SO4 and SO5 have minor positive effects on IIA7 as the objectives seek to protect the environment. The policies have uncertain mixed positive and negative effects. These effects recognise the efforts of the WLWP to protect the natural environment; however, the nature of waste management means that all adverse effects on biodiversity cannot be ruled out. Consequently, overall the WLWP is considered to have an uncertain but mixed minor positive and minor negative effect on IIA7.

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

1.63 The vision, objectives and policies have a mix of effects on IIA8. They are mostly negligible or minor positive, due to the measures put in place within the WLWP to maximise the efficient use of land within west London by safeguarding existing waste uses, but also to protect environment and local amenity which should include townscapes and open space. However, the nature of waste management means that all adverse effects on open spaces and townscape cannot be ruled out. Consequently, overall the WLWP is considered to have an uncertain but mixed minor positive and minor negative effect on IIA8.

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

1.64 The vision and some of the objectives and policies have a negligible effect on IIA9. Where an effect was identified, the policies have mixed minor positive and minor negative effects on IIA9. These effects recognise the efforts of the WLWP to maximise the efficient use of water in waste management and protect the quality of west London's water resources; however, the nature of waste management means that all adverse effects on water quality cannot be ruled out. Consequently, overall the WLWP is considered to have an uncertain but mixed minor positive and minor negative effect on IIA9.

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

1.65 Some of the objectives and some of the policies have a negligible effect or an uncertain negligible effect on IIA10. Where an effect was identified, the policies have a mix of minor positive and negative effects. These effects

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recognise the appropriate efforts of the WLWP to reduce flood risk associated with waste management, and overall, the WLWP is considered to have an uncertain but mixed minor positive and minor negative effect on IIA10.

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

1.66 The vision, objectives and policies have a mix of minor and significant positive and minor negative effects, with some uncertainty. The effects recognise the focus in the vision and policies on avoiding and minimising pollution generated by waste management in west London. Overall, a minor positive effect is recognised overall in acknowledgement of safeguards put in place.

IIA Objective 12: Protect and enhance mineral resources and soils

1.67 The vision, objectives and policies are considered to have minor or significant positive effects on IIA12. These effects acknowledge the measures put in place within the policies to maximise the efficient use of land within west London and use waste as a resource wherever possible. Consequently, the WLWP is considered to have a minor positive effect overall.

Cumulative effects of the WLWP with other plans

1.68 New or redevelopment waste proposals that come forward for determination in line with the WLWP will not be delivered in isolation from development proposals in other plans and projects covering west London and the surrounding area. This section outlines the development proposed by nationally significant infrastructure projects, plans covering London as a whole, and the Local Plans of the neighbouring authorities which may combine with the

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Proposed Submission WLWP to produce cumulative effects. However, it is noted that no new development is proposed through the WLWP.

Potential for cumulative effects with Nationally Significant Infrastructure Projects

1.69 At the time of writing seven NSIP projects within London were identified on the National Infrastructure Planning website:

- Expansion of Heathrow (third runway)
- North London (Electricity Line) Reinforcement
- North London Heat and Power Project
- Riverside Energy Park
- Silvertown Tunnel
- Teddington Direct River Abstraction
- Thames Tideway Tunnel

1.70 There is uncertainty around the potential cumulative effects of NSIP projects across London in relation to the Proposed Submission WLWP, given no new waste facilities are allocated in the WLWP. Any cumulative effects would only occur if proposals for new or redevelopment of existing waste facilities come forward within proximity of the NSIPs, which cannot be known at this time. In these cases, there could be potential for cumulative effects in relation to NSIPs such as flood risk and water quality in the Thames; air quality, including from increased road traffic on the major arterial roads; noise and vibration; biodiversity; and landscape and visual amenity.

Potential for cumulative effects with the London Plan and other London strategies

1.71 The London Plan 2021 provides the regional planning framework for London. The relevant plans and strategies in relation to the WLWP are set out in Chapter 3 and an expanded list is contained in Appendix A of the main IIA Report.

1.72 The Proposed Submission WLWP could result in in-combination effects with the London Plan depending on the specific location and type of development that may come forward for waste management use, and its relationship to growth areas identified in the London Plan. Given that there are no specific site allocations for new waste facilities within the Proposed Submission WLWP, it is likely that any in-combination effects will be minimal.

1.73 The London Transport Plan is designed to deliver the transport solutions required to support development delivered through Borough Local Plans in London, while also addressing existing transport challenges and issues, including improving the public transport network, to improve use of public transport and to reduce air pollution. The small amount of development that might come forward for determination against policies in the WLWP is likely to result in a negligible effect when combined with the large-scale projects within the London Transport Plan.

West London Local Plans and neighbouring Local Plans

1.74 Each of the waste planning authorities within the WLWP area has an adopted local plan. The main development proposed by their respective Local Plans is summarised in Appendix C (Baseline) of the main IIA Report.

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1.75 All of the local plans, provide for both increases in housing supply as well as job creation. The increased level of development in west London and neighbouring authorities will lead to increased traffic, which in turn has the potential to increase air pollution and carbon emissions. These effects may combine with similar effects if any new or redevelopment of existing waste facilities are proposed for determination in line with the WLWP. To mitigate this, the Local Plans aim to support sustainable transport modes and energy efficiency in built development. Many of the in-combination effects at the west London scale are likely to be concentrated within and around major development areas and along the strategic transport corridors. The main development proposed by their respective Local Plans is summarised in Appendix C (Baseline) of the IIA Report. A number of the locations targeted for large-scale growth by neighbouring plans are close to the border of the plan area, increasing the potential for more localised in-combination effects. There may be localised impacts in relation to health, noise, air quality, water resources and flooding, and transport.

1.76 Although there may be increased negative cumulative effects when the Proposed Submission WLWP is considered alongside other plans and projects, the policies within the Proposed Submission WLWP that seek to protect the environment and local amenity could result in increased positive effects, when taken alongside similar policies in the wider development plan.

1.77 However, given the lack of allocations within the Proposed Submission WLWP for new or improved waste facilities over the plan period as there is a lack of need for additional waste management capacity, it is likely that the cumulative effect of the Proposed Submission WLWP with other local plans will be minimal.

Stage D: Consultation

1.78 This Non-Technical Summary will be available on the Ealing Council consultation website and accompany the main IIA Report. Both documents will be consulted on with the Regulation 19 Proposed Submission WLWP.

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1.79 The Regulation 19 WLWP will be published to give interested parties an opportunity to comment on its legal compliance and soundness. Following this, the local planning authorities intend to submit the Proposed Submission WLWP and accompanying documents, including the IIA, for independent examination.

1.80 At examination, the Inspector will consider the representations received on both the WLWP and IIA, before reporting back on soundness or identifying the need for main modifications. If the Inspector identifies the need for main modifications, these will be prepared and published for consultation alongside an updated IIA if necessary.

1.81 Once found to be ‘sound’ by the Inspector, the WLWP will be adopted by each of the west London waste planning authorities. At that time, the ‘IIA Adoption Statement’ must be published that sets out certain information required by the SEA regulations, including on monitoring indicators to be used for monitoring the effects of the new WLWP.

Stage E: Monitoring

1.82 Chapter 7 of the main IIA Report suggests indicators for monitoring the potential sustainability effects of implementing the new WLWP taking into account monitoring indicators included within the Proposed Submission WLWP. Any additional sustainability monitoring indicators should be integrated into the WLWP monitoring framework with the purpose of identifying adverse sustainability effects at an early stage and being able to undertake appropriate remedial action.

Report produced by LUC

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