



Regulation 18 Plan

Consultation Statement

Final 2.2

Date: May 2026



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1 Introduction

Purpose

- 1.1 This Consultation Statement 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 engaged with stakeholders in preparing the West London Waste Plan (WLWP) in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (the 'plan making Regulations').
- 1.2 This Consultation Statement has been prepared to accompany the publication of the Proposed Submission WLWP in accordance with Regulation 19 of the plan making Regulations. The Statement is intended to demonstrate that consultation undertaken during the preparation of the WLWP has been in accordance with the relevant Regulations and the 'West London Waste Plan Consultation Protocol' (the WLWP Consultation Protocol).
- 1.3 The WLWP Consultation Protocol sets out the overarching approach to consultation and communication taken during the preparation of the Plan including how the West London local planning authorities consult and involve the public, statutory consultees and other organisations when preparing the WLWP, reflecting the approaches taken in each LPA's Statement of Community Involvement (SCI). The latest version of the WLWP Consultation Protocol can be viewed on the [consultation website](#). This statement therefore considers the actual consultation activities undertaken so far.
- 1.4 This Consultation Statement comprises four 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 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 version of the WLWP. Section 4 is supported by Appendix 1 which provides more detail concerning the comments received and WLLPAs' responses.

2 Plan Production Timeline

- 2.1 The creation of a new Waste Local Plan requires thorough and robust consultation. Engagement with the local community, businesses and organisations helps develop a Plan that is tailored to meeting the needs of the Plan area in terms of strategy and the policies required to deliver it.
- 2.2 The timetable 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 plan making Regulations.

Key Plan Production Stages

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 draft WLWP (Regulation 18 draft) 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 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 development of the policies.

**Stage 2: Reg 18 Draft West London Waste Plan consultation – 11th
December 2025 – 6th February 2026**

2.7 The WLLPAs consulted on a draft version of the WLWP under Regulation 18 for an eight-week period between Thursday 11th December and Friday 6th February 2026 (taking account of the consultation period extending over Christmas). Evidence base and other supporting documents, including an Integrated Impact Assessment, were published alongside the draft WLWP. The [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
- Consultation Protocol
- Frequently Asked Questions
- Response Form
- Call for Sites Form
- Listing of Consultation Events & Locations
- Privacy Statement

Stage 3: Plan amendments and evidence base update – February 2025 - May 2026

- 2.8 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, Capacity Assessment and Assessment of Sites for Release from Safeguarding Report have been updated as necessary to reflect this. In addition, the small number of sites proposed in the Call-for-Sites were assessed, in the context of there being a surplus of capacity and so no strategic need to allocate additional sites through the Plan. The Plan was updated to take account of comments and ensure that it is both sound and legally compliant. The draft Regulation 19 Proposed Submission WLWP will be considered by each WLLPA (via Committee, Cabinet and/or full Council/Board as dictated by each Constitution) during the period May to July 2026 prior to publication.

Stage 4: Publish the Plan (Submission Plan Reg 19) – Mid/Late 2026

- 2.9 In accordance with Regulation 19 of the plan making Regulations, a Proposed Submission version of the WLWP will be made available for representations on its soundness and legality to be made for a minimum period of 6 weeks. 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

- 2.10 The WLLPAs will assess the representations received during the Regulation 19 formal consultation and submit a version of the WLWP they deem to be sound for examination by an independent inspector appointed by the Secretary of State.

Stage 6: Examination: Early-mid 2027

- 2.11 The Plan will be examined by an independent Planning Inspector.

Stage 7: Adoption - Late 2027

- 2.12 Subject to the Plan being found sound and legally compliant by the Inspector, the Plan will be adopted by each of the WLLPAs during 2027.

3 Summary of Regulation 18 Consultation Process

3.1 A draft Plan was published for consultation for a period of eight weeks between 11th December 2025 and 6th February 2026. The Plan, the evidence base and other supporting documents were made available for viewing [online](#) and hard copy documents were made available in each constituent local planning authority area. Organisations and persons were invited to make representations under Regulation 18.

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
 - 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 WLLAPs' planning contact databases.

How bodies and persons were invited to make representations

- 3.3 A range of engagement methods were used 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 an invitation to attend events (drop-ins and online event).
- 3.5 Public notices about the consultation were published in the local news publications and the WLLPA's also published information on their social media channels.
- 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 on the website from 11th December 2025.
- 3.7 Hard copies of the draft WLWP were made available for inspection at each of the WLLPA main offices and selected local libraries in each local planning authority area.
- 3.8 Two online consultation sessions were held (using Microsoft Teams) which took place on at 12.30pm on 16th December 2025 and 17.00pm on 21st January 2026. An event recording was made available for viewing on the consultation website.
- 3.9 Further information about the WLWP and the consultation was set in 'Frequently Asked Questions' which were published on the [consultation website](#).
- 3.10 A feedback form was provided specifically for use in submitting comments and queries either by email or post.
- 3.11 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.

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 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 and adjoining regions) and were able to inform 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 4 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 Meetings were held in late 2025, and further correspondence took place with representatives of Tower Hamlets Council and Westminster City Council to explore their requests to share capacity to meet unmet needs.

4 Outcome of 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 of 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 has been prepared which summarises each of the issues raised in response to the consultation, and how these issues have been addressed, as appropriate, in preparing the Regulation 19 Submission WLWP. This is included in Appendix 1 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 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 compensation 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 safeguarding** from specified sites, 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 WLWP area 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 forty five were from individuals, residents or representatives of 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 that there is sufficient waste management capacity to meet 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 2.

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

Strategic Cooperation

4.22 Engagement has taken place primarily with the GLA through a number of meetings.

Next Steps

4.23 The WLLPAs intend to reach out to the London WPAs that have made initial requests to discuss sharing surplus capacity.

4.24 Engagement with GLA is expected to continue, with the possibility of a Statement of Common Ground being agreed nearer to Plan Examination

4.25 A separate Engagement Activity Statement will be prepared post Regulation 19 which will itemise each specific action and outcomes.

Appendix 1: 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

Part of Plan (references to Draft Plan Reg 18)	Subject of representation	Representor	Response
			development management decision where relevant. See Figure 3 of this Plan to show inter relationship.
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 - text added. 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. 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 ' <i>Assessment of Safeguarded Waste Sites to be Released</i> ' report. While certain other sites have been proposed for release in the representations received, they do not meet the criteria and so cannot currently be released without compensatory capacity being provided.

Part of Plan (references to Draft Plan Reg 18)	Subject of representation	Representor	Response
	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). <i>"Without sustained action, there remains the risk of a major shortfall in our capacity to treat and dispose of hazardous waste safely."</i> 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
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 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 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			
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. 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. 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
	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. 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. Quattro no longer has an interest in the site in terms of land ownership or operation. 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			
Part of Plan (references to Draft Plan Reg 18)	Subject of representation	Representor	Response
Para 9.28	Should refer to assessment of impact 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			
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. 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 explains the locally relevant definition of a waste site to ensure the effective

			safeguarding of critical waste management capacity. 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. 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. See further details in the response to the Mayor of London/GLA comment regarding the definition. 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 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	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: • extant planning permission; • Certificates of Lawful Existing Use or Development; • that have become lawful through the

	aligned with London Plan.		passage of time; or those ancillary to other uses should be safeguarded in principle. 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. 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 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
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			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. 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. Use of greener transport modes should be prioritised. 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). 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. 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
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. 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
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 applied through safeguarding. Capacity will depend on rail capacity and train paths, available freight trains and	Day Group	No change proposed. Part (I) of Policy WLWP 1 is not intended to quantify rail capacity (for example in terms of train movements or throughputs), but

	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.		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 transshipment 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 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 repeat in WLWP. Reference to archaeology added to para 8.42 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
	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. 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 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			
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			
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). Dredgings may or may not be inert depending on chemical composition (and hence Clause B more likely to apply).
	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

Policy WLWP 5: Deposit of Waste on Land			
			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: <i>'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'</i> . 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 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 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 no effect on	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). 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
	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 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. 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 Station Approach,	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
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	Query's 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 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 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 Unit 1 Wallingford Rd	Site HI16: Adjacent - unaffected by proposed airport expansion	Heathrow Airport	Noted
HI20 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 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 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 (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
	Confirm assessed capacity is up to 150,000tpa		Change Proposed - Capacity assessment values adjusted to reflect feedback

Part of Plan (references to Draft Plan Reg 18)	Subject of representation	Representor	Response
HO3 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 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 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. 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.).
	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	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

Part of Plan (references to Draft Plan Reg 18)	Subject of representation	Representor	Response
	local amenities.		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. 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.	On behalf of Bambra (site owner)	No change proposed. The wider site already encompasses three safeguarded sites (E05, E14 & E06), covering approximately 40% of the western part of this proposed larger site. Whilst the eastern half of the wider site may be covered by waste exemptions, no part of this site is covered by a planning permission or long-term use. Therefore, currently that part of the site does not satisfy the proposed WLWP definition of a waste site.
HI09 Holoway 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. 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). 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 new site at Holly Hilly Farm for excavation waste, which began operating in 2022		Any idea of capacities and any end dates?

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, SINC's do not receive statutory protection. 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. 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		Change Proposed - Para. 3.45 has been updated to refer to policy protection in the London Plan rather than statutory protection for SINC's, 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 Report: "Although some potential minor negative effects have still been identified for the

	response to that policy.		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 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.		No change proposed to the IIA.

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 " <i>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</i> " 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

Representor	Subject of representation	Response
		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 " <i>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</i> " 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 locations better used for industrial intensification (and LBTH has shortfall of industrial land)	No expectation in London Plan to share capacity for non apportioned waste.
	LBTH seeks 'transfer' of 192,370tpa HIC capacity and 56,935tpa CDE	Noted - pending outcome of discussions with

Representor	Subject of representation	Response
	capacity.	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.
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	Noted

Representor	Subject of representation	Response
	costs, management etc are key to determining suitability of proposals for freight on the waterway.	
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
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 2: 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 is 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 Areas 1 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 management²⁸ (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 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 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 existing³⁰ 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.**