

Schedule of Changes to the Regulation 18 Draft Updates West London Waste Plan

Version 1.0 — 28 May 2026

The following schedule documents the substantive changes that have been made to the Regulation 18 version of the Draft West London Waste Plan (WLWP) that was subject to consultation between December 2025- February 2026.

The changes respond to representations received during that process, as well as ongoing development of the Plan reflecting the fact the Regulation 19 version of the Plan is the version the WLLPAs intend to submit to the Secretary of State for examination. They include correctly referencing the current stage of the plan making process in the document and improving the clarity of policy and supporting text.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
Chapter 1: Executive Summary			
1.2	In west London, the adopted waste local plan, known as the 'West London Waste Plan 2015' (WLWP 2015), was adopted in 2015. The West London Waste Plan plans for the management of waste through to 2031 2041 within the following London boroughs: Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond u...	Change from Reg. 18 to Reg. 19 version	Text updated to reflect this now being the Proposed Submission Version of the Plan to be submitted for adoption.
1.3	The updated version of the This West London Waste Plan (WLWP) will covers all types of waste expected to be produced within west London during the Plan period. It will focusses especially on the management of Household, Industrial and Commercial (HIC) waste, Construction, Demolition and Excavation (C, D & E) waste and Hazardous waste. In doing so this version of the WLWP takes account of the requirements of the London Plan and the West London Waste Authority's strategy for managing Local Authority Collected Waste (LACW).	Change from Reg. 18 to Reg. 19 version	Text updated to reflect this now being the Proposed Submission Version of the Plan to be submitted for adoption.
1.5	This draft emerging updated WLWP includes a Vision and five Strategic Objectives, along with six <u>seven</u> policies that will guide decisions about waste related planning applications...	Improved clarity	Replacement of 'six' with 'seven' policies to reflect the inclusion of the new Policy WLWP 7 (Wastewater Infrastructure).
1.5 (bullet list)	...• <u>Policy WLWP 7 – Wastewater Infrastructure</u>	Thames Water Utilities	New bullet added to the list of WLWP policies to reflect the inclusion of a new wastewater infrastructure policy in this version of the Plan.
1.6	They provide a clear framework to support waste management development to meet targets <u>emerging needs</u> , protect existing capacity and allow for the release of land from waste use where appropriate.	Improved clarity	Replacement of the word 'targets' with 'emerging needs' more accurately reflects the strategic objectives of the Plan.'

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
1.7	A <u>The most</u> recent assessment shows that west London has sufficient capacity for the management of current and forecast future waste arisings, other than for landfill. This includes the amounts of HIC waste apportioned for management by each London borough through <u>in</u> the 2021 London Plan through to 2041 . Therefore, there is no immediate need for more waste management requirements <u>capacity</u> within the Plan area.	Improved clarity	Addition of 'The most', 'through to 2041' and 'capacity', and removal of 'through' and 'requirements', to clarify the timeframe and confirm that it is management capacity that is sufficient.
1.8	This updated WLWP is considered to be in general conformity with the requirements of the 2021 London Plan. However the London Plan is under review and once the new version is adopted, this updated WLWP may also need to be reviewed to ensure it aligns with it. For now, this draft version is considered to be in general conformity with the requirements of the 2021 London Plan.	Change from Reg. 18 to Reg. 19 version	Addition of text confirming general conformity with the 2021 London Plan.
1.8	<u>In addition the possibility of the Heathrow expansion plan going ahead within the Plan period, may also trigger an early review, depending on its precise implications for provision of waste management capacity in west London.</u>	Heathrow Airport	Addition of text noting that the possibility of Heathrow expansion within the Plan period may trigger an early review of the Plan.
1.9	...e sites in west London. It also supports additional waste development where such development will help achieve the Plan's goals. However , It does not identify specific areas of land for the development of additional waste management capacity.	Improved clarity	Removal of 'However,' as there is no need for it.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
Chapter 2: Introduction and background			
2.2	.. to determine applications for planning permission relating to waste management -development.	Improved clarity	Removal of 'management' as implicit in the surrounding wording.
2.3	In W est London, the current <u>version of waste local plan</u> , known as the 'West London Waste Plan' (WLWP 2015), was adopted in 2015	Change from Reg. 18 to Reg. 19 version	Addition of 'version of' and removal of 'waste local plan, known as' to streamline the description of the current WLWP.
2.4	...Once adopted, <u>this version of the updated</u> West London Waste Plan ('WLWP' or 'the Plan'), will replace the adopted West London Waste Plan 2015 taking account of changes in policy and taking the planning horizon forward for another 15 years. The adopted West London...	Change from Reg. 18 to Reg. 19 version	Removal of 'updated' from the phrase 'this version of the updated West London Waste Plan'. At Regulation 19 stage the word 'updated' is redundant — the Plan title alone is sufficient. Removal of 'will' so that the clause reads 'replaces' rather than 'will replace'. Removal of 'adopted' before 'West London Waste Plan 2015' anticipates adoption of this version of the WLWP following examination.
2.5	The other areas of London have either prepared, or are in the process of <u>are also responsible for</u> preparing their own waste plans and/or planning policies <u>for waste in order that</u> the requirements of the <u>extant</u> London Plan are met	Improved clarity	The retained wording 'are also responsible for preparing their own waste plans' gives no implied understanding of the status of the other area's plan-making processes. Removal of the word 'waste' as unnecessary repetition given the context of 'planning policies for waste'. 'Extant' as the London Plan is subject to review.
Figure 1	...Figure 1 <u>Map of West London Waste Plan area</u> The plan area of the West London Waste Plan	Improved clarity	Simplification of the Figure 1 caption sub-title with the cleaner, more conventional map title .
2.7 (bullet list)		Improved clarity	The whole set of sub-bullets in paragraph 2.7 has been deleted as considered to be of historical interest only.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
2.7	... Once adopted the WLLPAs will use the policies in this WLWP when determining planning applications relating to waste management development, so it is essential that the Plan provides an up-to-date policy framework that reflects these changes to support the more sustainable management of waste that is produced.	Change from Reg. 18 to Reg. 19 version	Wording reflects Proposed Submission status of this version of WLWP.
2.9	shown below are the various stages with regard to the preparation of the new WLWP. The different stages provide opportunities for residents, businesses and other key stakeholders to comment and be involved in determining the content of the Plan. A Consultation Protocol has been prepared that sets out in more detail how the WLLPAs are seeking to engage with <u>how</u> communities and stakeholders <u>have been engaged</u> during the preparation of the Plan.	Change from Reg. 18 to Reg. 19 version	Wording reflects Proposed Submission status of this version of WLWP.
2.9 (bullet list)	End Feb 2026 — WLWP 8 week public consultation Regulation 18 Mid 2026 — Final submission WLWP published for representations Regulation 19 Late 2026 — WLWP submitted for independent examination Early 2027 — Examination hearings, if needed Mid 2027 — Main modifications, if needed, published for representations Late 2027 — Inspector's Report Late 2027 — Adoption	Change from Reg. 18 to Reg. 19 version	Removal of the timetable as inclusion no longer appropriate in Regulation 19 version.
2.12	The Vision and Strategic Objectives set out how it is proposed that waste <u>ought to</u> be managed to ensure its <u>management</u> benefits, protects and enhances communities and the environment of west London. The Policies and Policies Map are intended to ensure the Vision is realised and the Strategic Objectives are achieved. To ensure the objectives of <u>this</u> the Plan are being met and the policies are working effectively, certain indicators <u>(as set out in Appendix 1)</u> will be monitored on a regular basis as set out in Appendix 1.	Reg. 19 update	At Regulation 19 stage the Vision and Strategic Objectives are established for the Plan rather than proposals.

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2.14	...ion 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires Waste Planning Authorities (WPA) to <u>publish the version of the Plan that is to be submitted to the Secretary of State for examination on its legal compliance and soundness for a minimum period of six weeks . During this period representations can be made on the soundness and legal compliance of the Plan. A representation form and guidance note is available and should be used and referenced by anyone wishing to make such a representation.</u>	Reg 19 update	Addition of new text explaining the Regulation 19 requirement.
2.17	This draft emerging <u>Proposed Submission</u> WLWP is underpinned supported by <u>the following</u> evidence base documents including:	Reg 19 update and Improved clarity	Addition of 'Proposed Submission' and 'the following', and removal of 'underpinned' (replaced by 'supported'), to update terminology and improve readability.
Chapter 3: The Plan Context			
3.3	<u>...In addition the presence of Heathrow Airport and RAF Northolt introduce aerodrome safeguarding considerations. In addition, the prospect of the expansion of Heathrow Airport will place pressure on certain existing waste sites.</u>	Heathrow Airport/ Ministry of Defence	New text added in response to representations.
3.6	Brent currently accommodates 10 3 existing waste facilities adjudged to be lawful ...	Correction	Replacement to update/correct Reg. 18 count.
3.6	...ste sites identified within the adopted Brent Local Plan for comprehensive, residential-led redevelopment are put forward in this Waste Plan to be considered for release from safeguarding ...	Improved clarity Reg. 19 update	Removal of 'Waste' as not needed in context. Removal of 'to be considered' as this version of the Plan sets out the established position.
3.7	. With 14 existing waste management facilities in operation adjudged to be lawful (excluding those located in OPDC)....	Improved clarity	Removal of 'management' as 'waste facilities' is sufficient in context.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
3.8	... Harrow currently hosts only two existing waste management facilities adjudged to be lawful...	Improved clarity	Removal of 'management' as 'waste facilities' is sufficient in context.
3.9	Hillingdon benefits from industrial and transport hubs, including Heathrow Airport, Stockley Park , and the Hayes and West Drayton Corridor, which generate substantial <u>quantities of</u> commercial and industrial waste...	Improved clarity	
3.9	<u>In addition, the proposed expansion of Heathrow Airport can be expected to place additional pressure on waste infrastructure if it goes ahead.</u>	Heathrow Airport	New text added in response to representation.
3.9	With around 23 <u>21</u> existing waste facilities adjudged to be lawful, ...	Reg. 19 update	Update of number of existing waste sites to reflect change from Reg. 18 to Reg 19 deletion of site HI14.
3.10	 With <u>10</u> 1 existing waste management facilities adjudged to be lawful ...	Correction	Replacement to update/correct Reg. 18 count.
3.10	... One existing waste site identified within the adopted Hounslow Local Plan for comprehensive, residential-led redevelopment is put forward in this Waste Plan to be considered for release from safeguarding, ...	Reg. 19 update	Removal of 'adopted' as Hounslow Local Plan undergoing examination. Removal of 'to be considered' as this version of the Plan sets out the established position.
3.11	... <u>Two waste sites are identified for comprehensive redevelopment are put forward in this Plan for release from safeguarding, as their continued safeguarding and use for waste is likely to conflict with wider planning and regeneration objectives of the Local Plan.</u>	Reg. 19 update	Addition as this version of the Plan sets out the established position.
3.12	Richmond upon Thames has the smallest industrial base in <u>west</u> London, with just four existing waste management facilities adjudged to be lawful...	Improved clarity	Removal of 'management' as 'waste facilities' is sufficient in context.

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3.14	First, competition for land and conflicting uses highlights the need to safeguard existing waste management facilities, particularly where they are located on industrial sites. Waste management facilities are often under residential and commercial redevelopment pressure, while other brownfield land is productively used and designations such as Green Belt and MOL apply to greenfield areas limit opportunities for expansion....	Improved clarity	Removal of 'management' as 'waste facilities' is sufficient in context. Removal of 'apply to greenfield areas' as Green Belt designation not exclusive to greenfield areas (noting new Grey Belt designation).'
3.15	Growth areas will <u>are expected to</u> generate significant additional amounts of waste...	Improved clarity	Replacement of 'will' with 'are expected to' as less certain.
3.17	..., while opportunities for rail and river freight at locations such as West Drayton, Brentford, <u>using</u> the Grand Union Canal and the River Thames, should be fully exploited.	Improved clarity	Addition of 'using' to complete the sentence.
3.18	To address these issues, the planning strategy for waste management in west London focuses on two key areas: a. First, maintaining sufficient suitable management capacity by safeguarding key existing waste sites and <u>providing</u> allowing for the use of such sites to be intensified to meet emerging requirements <u>needs</u> , where appropriate.	Improved clarity	Removal of 'management', 'allowing' and 'requirements', and addition of 'providing' and 'needs', to tighten the description of the planning strategy and align with 'emerging needs' used elsewhere.

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Chapter 4: Waste Management in West London			
4.2	...This WLWP focuses on providing <u>management capacity</u> for the principal types of waste produced within west London...	Improved clarity	Focus of Plan is on provision of 'management capacity'.
4.3	LACW collected by or on behalf of the Boroughs <u>local authorities</u> can include household waste (residual, dry mixed recycling and food waste),	Improved clarity	Replacement of 'the Boroughs' with 'local authorities' as not all WCAs are Boroughs, but by definition all LACW is collected on behalf of local authorities.
4.4	... A significant proportion of commercial waste (c60%) is also classed as municipal waste and, which is therefore subject to statutory management targets that also affect LACW set out in a subsequent section of this Plan.	Improved clarity	Text changed to improve flow.
4.5	...These first two categories <u>of waste</u> (LACW and C&I) ...	Improved clarity	New text added for flow.
4.5	...The London Plan apportions quantities of <u>forecast</u> HIC waste arisings to each Borough within London for provision of management capacity through to 2041. ... It is this The 'HIC waste' categorisation is used throughout this Plan to reflect reflecting the influence of the London Plan on its <u>this Plan's</u> approach/trajectory.	Improved clarity	New text added for flow.
4.6	... and effects of plasterboard may also be present ..	Improved clarity	
4.6	... Due to their weight, the inert elements <u>generally</u> make up the majority (c.80%) of the total tonnage.	Improved clarity	

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
4.6	Construction, demolition & excavation (C, D & E) waste comprises waste arising from construction and demolition activity, including excavation during construction activities, and is made up of mainly inert materials such as soils, stone, concrete, brick and tile <u>and soils and stone excavated during ground work prior to construction.</u> However, non-inert elements such as wood, metals, plastics, cardboard, and offcuts of plasterboard may also be present in this waste stream. Due to their weight, the inert elements <u>generally</u> make up the majority (c.80%) of the total tonnage.	Improved clarity	Reorganisation of text 'including excavation during construction activities,' and 'soils, stone,' as excavation waste is dealt with separately. Removal of 'offcuts of' as 'plasterboard may present in more than just offcut form.' Addition of 'generally' as the c.80% proportion is approximate, not fixed.
4.7	The London Plan deals with construction and demolition waste separately to excavation waste, as excavation waste is not normally suited to recycling, and this distinction is recognised in the waste evidence reports produced to that support production of this Plan. The London Plan does not apportion quantities of <u>C & D & E</u> waste for management, but <u>this Plan LPAs are required to still-plans for this waste stream to meet national planning policy.</u>	Improved clarity	Removal of redundant wording ('produced to', 'production of', 'required to', 'to meet national planning policy') and replacement of 'LPAs are' with 'this Plan', to clarify that it is the Plan, rather than the LPAs, that plans for this waste stream and it does so because it is needed not just because it is required to do so through national planning policy.
4.9	...The London Plan states that hazardous waste arising in the HIC waste stream (to which <u>the apportionments relate</u>) <u>is included in the apportioned tonnages</u> includes hazardous waste , and therefore does not distinguish its management needs from the non-hazardous component of HIC waste ...	Improved clarity	Reorganization to improve flow.
	Existing Management Arrangements for West London's waste Moved to Appendix 5	Reg. 19 update	Moved as text relates to a time bounded description.
4.10	... It is intended that <u>6 8</u> sites would be safeguarded through the Plan for ongoing waste management uses...	Reg. 19 update	Number of safeguarded sites revised from 68 to 66.
Figure 2	...Figure 2 Map of West London Existing Waste Sites Proposed to be Safeguarded	Colne Valley Regional Park Rep	Figure 2 replaced with a version that includes site reference numbers.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
Chapter 5: The Policy Context			
5.2	To be found sound the updated new WLWP will need to be in general conformity with the London Plan and consistent with national policy. The WLWP is also aligned with the policies of the adopted Local Plans in West London of the WLLPAs. The WLWP may updates relevant aspects of the Development Plan and where any conflict between policies exists, the policy to have been adopted most recently generally takes precedence in decision making. Once adopted, the policies in <u>this version of the updated</u> WLWP will supersede the policies in the existing WLWP (2015). Appendix 4 sets out how the existing WLWP (2015) policies will be <u>are</u> replaced by those set out in <u>this version of the updated</u> WLWP.	Reg. 19 update	Text updated to reflect Proposed submission version of WLWP.
5.3	Once adopted <u>this version of the updated</u> WLWP will-forms part of the statutory Development Plan for the WLLPAs, to guide decision-making on planning applications in relation to waste management and related developments. ..	Improved clarity	Text updated to reflect Proposed submission version of WLWP.
5.4	... within a <u>local planning authority's</u> borough's Development Plan,	Improved clarity	Replacement to cover OPDC which isn't a borough.
5.4	... policies that are also relevant to <u>a waste application s for waste related development</u>	Improved clarity	Replacement 'a waste' with 'applications for waste related development' as more precise.
5.4	 Each <u>LPA</u> borough may also have adopted ...	Improved clarity	Replacement 'borough' with 'LPA' as OPDC isn't a borough.
5.4	... adopted Supplementary Planning Documents (<u>SPDs</u>) which may be relevant.	Improved clarity	Addition of abbreviation '(SPDs)' for its later use in the same sentence.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
5.4	... when proposing waste related development, a number of adopted Local Plans the extant London Plan and, if relevant SPDs, will have to <u>should</u> supplementary planning documents will have to be consulted.	Improved clarity	Replacement to use SPD as acronym introduced.
5.10	 <u>The Government established a Circular Economy Task Force in 2024, and is expected to consult on five sector-specific roadmaps in 2026. Each roadmap is expected to include specific actions, timelines and policy recommendations to drive circularity within each target sector – textiles, transport, construction, agri-food and chemicals & plastics.</u>	Reg. 19 update	New text added to reflect post-Reg. 18 policy development (Circular Economy Task Force 2024 and forthcoming 2026 sector roadmaps).
5.12	 <u>Management</u> Waste routes which will count as residual are:	Improved clarity	Insertion to improve meaning.
5.13	... 31 January 2028 <u>(deferred to December 2030 in EIP update published December 2025):</u>	Reg. 19 update	New text added to reflect the December 2025 EIP update which deferred the interim residual waste target from Jan 2028 to Dec 2030.
5.15 (bullet list)	... • Chapter 2 of the ...	Improved clarity	Removal of chapter reference; a general citation to the NPPF is more durable through future NPPF revisions.
5.16	- NPPW expects planning authorities to ensure that new development includes proposals for handling waste arising from the construction and operation of development maximises reuse and recovery opportunities, and minimises off-site disposal Chapter 2 of the NPPF recognises the need for the planning system to consider the prudent use of natural resources and waste minimisation in the pursuit of sustainable development.	Improved clarity	Removal of 'of development' and 'Chapter 2 of' to generalise the references.
5.17	... when all residual waste was considered, were assuming that all such waste suitable for diversion from landfill.	Improved clarity	Replacement to improve flow.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
5.18	... accompanying this Plan summarises <u>how</u> the measures that waste planning and management can take both to mitigate climate change, by reducing greenhouse gas emissions, and to adapt to its likely impacts.	Improved clarity	Replacement improves flow.
5.19	..., and <u>other</u> recovery are maximised.	Improved clarity	Addition of 'other' signals that recovery extends beyond recycling (e.g. energy recovery).
5.20	... such measures <u>can</u> depend on...	Improved clarity	Addition of 'can' to qualify the dependency as conditional rather than absolute.
5.21	... (for example, anaerobic digestion <u>of organic waste</u> producing biogas for	Improved clarity	Addition specifies that anaerobic digestion applies to organic (biodegradable) waste in particular.
5.21	... producing biogas for <u>heating or</u> transport	Improved clarity	Addition acknowledges that biogas may be used for both heating and transport fuel.
5.21	... transport fuel compared with composting for soil conditioning, ...	Improved clarity	Removal of 'fuel' as an editing artefact; the sentence reads correctly without it.
5.24	... direct influence over <u>provision of type, quantity, and</u> management <u>facilities available for method</u> waste.	Improved clarity	Replacement improves flow/meaning.
5.24	... promote co-location of synergistic waste operations ...	Improved clarity	Removal of jargon..
5.25	... maximising recycling and recovery , and enabling	Improved clarity	Removal as recycling is included under the umbrella term 'recovery'.
5.25	 enabling <u>development of</u> the lowest-carbon waste management solutions.	Improved clarity	Addition clarifies that waste planning relates to the development of low-carbon solutions.
5.26	... including process water recycling and <u>rainwater harvesting for</u> on-site dust suppression, ...	Reg. 19 update	Addition of rainwater harvesting strengthens the suite of water-efficiency measures expected of waste facilities.

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5.29	...The network <u>of installations</u> ...	Improved clarity	Addition clarifies the subject of the sentence.
5.31	...The NPPW requires local planning authorities, with responsibility <u>for waste</u> planning as Waste Planning Authority ...	Improved clarity	Change specifies waste planning focus rather than WPA alone.
5.32	... unmet needs of other areas could be met within their <u>respective</u> own areas.	Improved clarity	Replacement improves flow.
5.33	... As stated previously, to be found sound the <u>this</u> WLWP needs to be in general conformity with the London Plan <u>to be found sound</u>	Improved clarity	Replacement to relate to this document itself being the Plan and improve flow/meaning.
5.33	... current adopted London Plan (2021) it is considered the updated Plan needs to address.	Reg. 19 update	Removal of unnecessarily tentative wording at Reg. 19 stage.
5.36	... to each borough (<u>'the borough apportionments'</u>) i...	Improved clarity	Addition introduces the defined term 'borough apportionments' used throughout this section.
5.36	... Hence <u>provision for its management</u> has been considered separately in the development of this emerging Plan.	Improved clarity	Addition explains that excavation waste has been considered.
5.37	...The borough apportionments were derived <u>by the GLA</u> through an assessment process ...	Improved clarity	Addition clarifies that the apportionments were derived by the GLA, not the WLLPAs.
5.37	... the ability of a particular borough to <u>accommodate</u> provide additional management capacity.	Improved clarity	'Accommodate' better reflects land-use considerations than 'provide'.
5.38	... although Mayoral Development Corporations such as OPDC <u>are</u> to cooperate.	Improved clarity	Addition acknowledges there may be more than one MDC.
5.39	... significantly higher than the <u>Plan</u> area's projected arisings	Improved clarity	Insertion makes specific to this Plan.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
5.39	... significant contribution <u>towards achievement of</u> the London Plan's <u>objective of</u> achieving net self-sufficiency <u>for London as a whole by 2026.</u>	Improved clarity	Addition of 'towards achievement of' and 'objective of', and removal of 'target', to describe net self-sufficiency as a London Plan objective rather than a target.. Addition clarifies that net self-sufficiency is a London Plan objective.
5.40 (bullet list)	...• ensure that there is zero biodegradable or recyclable waste <u>going</u> to landfill by 2026	Improved clarity	Insertion to improve flow.
5.41	 These neighbouring authorities could either be within London, or may be located beyond its boundaries.	Improved clarity	Removal of unnecessarily hedged wording.
5.41	 allows for this This <u>as well. Capacity provision is achieved assured</u> through Duty to Cooperate engagement with WPAs outside London hosting facilities	Reg. 19 update	Duty to Cooperate abolished by the Levelling-up and Regeneration Act 2023.
5.41	... engagement with WPAs outside London hosting facilities <u>identified in the evidence base report</u> that receive strategically significant amounts of hazardous waste from west London.	Improved clarity	Addition provides a link to the evidence base for the cross-boundary engagement referenced.
5.41 footnote 26	<i>Identification of Strategically Significant Cross Boundary Waste Movements from West London</i> , BPP Consulting, October 2025 <u>and/or any subsequent update</u>	Future proof Plan	Included in case of future update.
5.42	...The London Plan requires <u>local</u> borough Development Plans to	Improved clarity	Correction to acknowledge OPDC is not a borough. Development Plans' in line with London Plan terminology.
5.42	... with host boroughs to meet identified waste needs.	Improved clarity	Removal of 'host' as unnecessary jargon..
5.43	..to meet the apportionment and in the case of non-apportioned waste the target of achieving net self sufficiency, where it applies, is not compromised	Improved clarity	Make specific to apportioned waste capacity to align with London Plan.
5.44	... the transfer of apportioned waste <u>the unmet apportionment.</u>	Improved clarity	Addition to clarify meaning that it relates to the apportioned tonnages rather than the actual waste.

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5.46	... the loss of <u>existing</u> waste management sites,	Improved clarity	Adjustment aligns with term used elsewhere in the Plan ('existing waste sites' rather than 'waste management sites').
5.46	... as the emerging WLWP develops and continue to engage with the GLA accordingly.	Reg. 19 update	Clearer commitment to ongoing engagement with GLA..
5.51	... General conformity in that context only applies to activities involving local authority collected waste (LACW). <u>The principal entity upon which the above obligations fall in west London is the West London Waste Authority, otherwise known as WLWA.</u>	Reg. 19 update	Addition to add clarity as to which entity this falls to identifying the West London Waste Authority (WLWA) as the principal entity on which the obligations fall in west London.
5.52	 Shortly after, t he Mayor declared a climate emergency shortly after the Assembly and	Improved clarity	Relocation to improve flow.
5.52 footnote 28	Climate Change Topic Paper BPP Consulting October 2025 <u>and/or any subsequent update</u>	Future proof Plan	Included in case of future update.
5.53	 The following summary identifies policies <u>to that</u> will be considered alongside the policies in	Improved clarity	Deletion as unnecessary wording.
5.53	... the policies <u>in this version of the emerging WLWP following adoption.</u>	British Land	Addition clarifies that the identified policies apply when the WLWP once adopted.
5.56	...Harrow's <u>adopted</u> Proposed Submission Local Plan ...	Reg. 19 update	Update to reflect adoption of the Harrow Local Plan since Reg. 18 stage.
5.57	...Hillingdon's Local Plan <u>expects all developments to be designed to make the most efficient use of natural resources and include sustainable design and construction techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill. More broadly, encourages high density development in urban centres and modal shift away from car use. Policies ...</u>	Improved clarity	Replacement improves summary of Hillingdon's adopted Local Plan policy.
5.57	... SuDS are required unless demonstrated to be unviable, <u>where financial contributions will be sought</u> , ...	Improved clarity	Addition reflects Hillingdon's policy that financial contributions are sought where SuDS are unviable and not just flood mitigation.

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5.57	...nts such as green roofs and living walls are promoted. Developments within proximity to heat networks must connect unless exempted , and financial contributions may be sought for flood mitigation.	Improved clarity	Removal of duplicated reference to financial contributions covered earlier in the same passage.
5.60	... OPDC <u>also</u> does not have a separate <u>HIC waste</u> apportionment in the London Plan.	Improved clarity	Addition links the OPDC apportionment point to the preceding statement about OPDC's waste-authority status.
5.60	 Only the Brent and Ealing parts of the OPDC area <u>that fall within Brent and Ealing</u> are covered by	Improved clarity	Improves meaning.
5.60	...e the six other local planning authorities working together to develop this Plan. Only the Brent and Ealing parts of the OPDC area <u>that fall within Brent and Ealing</u> are covered by the this WLWP.	Reg. 19 update	Improves meaning.
5.61	... <u>Alongside the WLWP, it demonstrates how OPDC is helping the three host boroughs to meet their waste needs which it relates.</u>	Reg. 19 update	Addition explains how the OPDC Local Plan helps provide for waste needs.
5.61	... Water management, <u>urban greening and</u> biodiversity enhancement,	Reg. 19 update	Addition includes urban greening among the OPDC Local Plan requirements.
5.61	... biodiversity enhancement, <u>waste hierarchy and</u> circular economy principles	Reg. 19 update	Addition includes the waste hierarchy alongside circular economy principles in the OPDC summary.
5.61	... circular economy principles <u>as well as consideration of air quality, noise, vibration</u> are integral to the design.	Reg. 19 update	Addition broadens the OPDC summary to include amenity considerations particularly relevant to waste facilities.
5.62	... Reuse and Recycling Centre at Twyford to serve local residents	Improved clarity	Removal as the purpose of a public Reuse and Recycling Centre is self-evident.
5.63	<u>WLWA has entered into a Residual Waste Services Contract with West London Energy Recovery Ltd operated by Suez, to deliver an Integrated Waste Management Contract for the management of over 300,000 tpa of residual</u> to deliver an Integrated Waste Management Contract LACW produced in west London	Reg. 19 update	Replacement corrects contract detail.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
5.63	... LACW produced in west London <u>that runs to 2041</u> .	Reg. 19 update	Addition specifies the contract duration.
5.63	... following processing into RDF <u>for EfW outside London</u>	Reg. 19 update	Addition clarifies that RDF produced at the west London railheads is managed at EfW facilities outside London.
5.64	In 2002 WLWA has entered into a 25 year Residual Waste Services Contract with West London Energy Recovery Ltd operated by Suez, to deliver an Integrated Waste Management Contract for the management of over 300,000 tpa of residual LACW produced in west London that runs to 2041. This relies extensively on the export by rail of residual LACW by rail for EfW from two existing waste sites with railheads, Transport Avenue (Hounslow) and Victoria Road (Hillingdon) following processing into RDF for EfW outside London...	Change from Reg. 18 to Reg. 19 version	Update of the contract detail: the WLWA Residual Waste Services Contract is with West London Energy Recovery Ltd (operated by SUEZ), for the management of over 300,000 tpa of residual LACW, running to 2041, with RDF processed for EfW outside London.
Chapter 6: Vision and Objectives			
6.2	...6.2 The 'Strategic Objectives' set <u>out</u>	Improved clarity	Insertion of missing word ('set out').
Chapter 7: Future Requirements for Waste Management Capacity			
7.1	<u>.... In response to the Regulation 18 consultation, a number of representations were received relating to the inclusion or otherwise of particular sites in Appendix 2, and the tonnages attributed to these. As a result, and after careful consideration the WLLPAs have determined that in some cases the tonnages set out should be revised. The values relating to surplus capacity set out below reflect these changes. The site-specific alterations are shown in Appendix 2 against the relevant entry. The findings of the study are set out below.</u>	Reg. 19 update	Addition explains how Reg. 18 representations led to revised site tonnages reflected in the surplus capacity figures below.
7.1 footnote 30	West London Waste Plan, Assessment of Existing Waste Management Capacity, BPP Consulting, October 2025 <u>and/or any subsequent update.</u>	Future proof Plan	Included in case of future update.
7.2	...It is estimated that current qualifying waste management capacity in west London is capable of managing c.2.8 <u>8</u> million tpa of HIC waste	Reg. 19 update	Capacity figure updated to c.2.88 Mtpa following revised Appendix 2 tonnages.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
7.2	... Table 2 below shows that the surplus capacity for the management of apportioned waste at 2041 is estimated to be c0. <u>62</u> Mtpa.	Reg. 19 update	Surplus capacity at 2041 updated to c.0.62 Mtpa following revised tonnages.
Table 2	...Table <u>2</u>	Reg. 19 update	Replacement as previous Table 2 now moved to Appendix.
7.2 (bullet list)	...Assessed Capacity (<u>2026</u>)	Improved clarity	Addition specifies 2026 as the base year for the capacity assessment.
7.2 (bullet list)	<u>2,597,357</u> 2,807,586	Reg. 19 update	Revised capacity figure following updated Appendix 2 tonnages..
7.2 (bullet list)	<u>2,578,711</u> 2,805,432	Reg. 19 update	Revised capacity figure following updated Appendix 2 tonnages.
7.2 (bullet list)	<u>+505,357</u> +715,589	Reg. 19 update	Revised surplus figure reflecting updated capacity data.
7.2 (bullet list)	<u>+357,711</u> +584,432	Reg. 19 update	Revised surplus figure reflecting updated capacity data.
7.4	...When C&D waste is considered alone, the arisings value is 1.13Mt in 2023 rising to 1.26 <u>1.34</u> Mt in 2041.	Reg. 19 update	C&D arisings figure for 2041 completed (1.34 Mt).
7.4	... This compares with assessed capacity of 2. <u>41</u> Mtpa in 2023 reducing to 2	Reg. 19 update	C&D assessed capacity figure for 2023 completed (2.41 Mtpa).
7.4	... the arisings value is 1.13Mt in 2023 rising to <u>1.34</u> 2.6 Mt in 2041. This compares with assessed capacity of 2.41 2.5 Mtpa in 2023 reducing to <u>2.13Mtpa</u> 2.47 in 2041 (<u>after site release</u>).	Reg. 19 update	C&D capacity figure for 2041 completed (2.13 Mtpa). Addition clarifies that the 2041 capacity figure is after accounting for site releases.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
7.4	... giving a capacity surplus of 1. 28.35 Mtpa in 2023 and	Reg. 19 update	C&D capacity surplus for 2023 completed (1.28 Mtpa).
7.4	...and 0.79 <u>1.2</u> Mtpa in 2041 respectively.	Reg. 19 update	C&D capacity surplus for 2041 (0.79 Mtpa) reflecting updated capacity data.
7.4	... As excavation waste is not subject to the expectation of net self-sufficiency, capacity <u>adequacy</u> has not been assessed <u>in the same way, although a number of facilities where this waste is managed exist and are included in the safeguarded waste site listing in Appendix 2 of this Plan.</u>	Improved clarity	Addition clarifies that it is capacity adequacy (not capacity itself) that has not been assessed in the same way but excavation waste management facilities are still listed in Appendix 2.
7.5	...A forecast for hazardous waste arisings to 2041 indicates that 50,900 tpa <u>may</u> will be produced in 2041.	Improved clarity	Replacement of 'will' with 'may' reflecting uncertainty about predicting the future.
7.5	 This compares to existing hazardous waste management capacity of 129,400 <u>116,000</u> tpa which indicates there is a capacity surplus of approximately	Reg. 19 update	Hazardous waste capacity figure updated to include Arlington Works capacity.
7.5	... which indicates there is a capacity surplus of approximately 78,500 <u>64,400</u> tpa in 2041.	Reg. 19 update	Hazardous waste capacity surplus figure inserted (capacity minus forecast arisings).
7.7	... number 83) does however provide for the possible development of such capacity within west London where exceptional circumstances <u>are shown to</u> prevail.	Improved clarity	Addition tightens the policy by requiring exceptional circumstances to be demonstrated, not merely asserted.
7.8	...The London Plan expects <u>London boroughs</u> to offer to share any surplus capacity with other London boroughs that may be facing a shortfall <u>in meeting their apportionments</u>	Improved clarity	Insertion completes the subject of the sentence ('The London Plan expects London boroughs to offer to share...'). Addition specifies that the shortfall is in meeting London Plan apportionments.
7.8	...that may be facing a shortfall before considering release of existing sites from waste use. In light of the identified surplus of in C, & D waste and apportioned HIC waste management capacity, the LPAs	Improved clarity	Removal narrows the clause to apportioned HIC capacity, which is the relevant surplus for this point.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
7.8	...ease of existing sites from waste use. In light of the identified surplus of apportioned HIC waste management capacity, the LPAs have engaged with intend to invite other London boroughs <u>that have identified unmet needs to consider whether the surplus in West London might offer an opportunity for their and intend to continue to do so to be met</u> . It should be noted that the	Reg. 19 update	Replacement updates the language: at Reg. 19 stage the LPAs have already engaged with other boroughs. Replacement reframes the engagement around boroughs with identified unmet need. Replacement makes the LPAs' ongoing commitment to engagement explicit.
7.8	... It should be noted that the most recent dataset for 2023 shows significant tonnages of waste that arise from outside the WLWP area are managed at facilities located within the WLWP area (hence the <u>achievement of net self-sufficiency an</u> existence of the identified capacity surplus).	Improved clarity	Removal of 'most recent' as the dataset year (2023) is already specified. Addition explains why surplus capacity exists — west London facilities manage waste from outside the WLWP area.
7.9	...Any agreements on sharing capacity will be formalised <u>through an appropriate mechanism which may include a Statement of Common Ground</u> (or similar) to which all the LPAs party to this WLWP, and the Plan making entity seeking to share in west London <u>surplus</u> capacity will be signatories. ...	Improved clarity	Addition allows for alternative mechanism to be applied.
7.10 (bullet list)	... and therefore the <u>previous</u> existing sites allocated in the 2015 WLWP are released	Reg. 19 update	'Previous' correctly describes sites allocated in the 2015 WLWP, avoiding confusion with current sites.
7.11	...The list of sites proposed to be safeguarded through the emerging updated WLWP is included in Appendix 2, with maps <u>of each boundary</u> included in Appendix 3. ...	Improved clarity	Addition clarifies that Appendix 3 contains maps of each safeguarded site boundary.
7.12	... LPA Local Plans for non-waste uses are considered in a separate report. When the prospective loss of capacity offered by these sites and has been factored into the assessment of existing waste management capacity, <u>set out outlined</u> above, <u>and</u> surpluses for the management of HIC waste and C&D waste still that remain.	Improved clarity	Addition clarifies that the capacity loss has already been factored into the assessment. Addition links the two conclusions of the capacity assessment (HIC and C&D surpluses). Removal of 'still' for a more direct statement that the surpluses remain.
7.12 (Table 8)	Table 8 (Existing Waste Sites Proposed for Release from Safeguarding) — full table moved to Appendix 6.	Reg. 19 update	Relocation of Table 8 to Appendix 6 for reference.
7.12 footnote 34	<i>Safeguarded Sites for Release in West London – Assessment Report</i> , BPP Consulting, October 2025 <u>and/or any subsequent update</u> .	Future proof Plan	Included in case of future update.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
Chapter 8: Proposed Policies			
8.1	...The following section sets out the policies to <u>be used when included in the updated WLWP for use when the LPAs are</u> determining applications for planning consent for waste related development in west London. ...	Reg. 19 update	More direct wording given the version of the WLWP.
8.2	<u>Policy WLWP 7 –Wastewater Infrastructure</u> <u>Policy setting out requirements for applications seeking to expand wastewater treatment infrastructure and associated safeguarding requirements.</u>	Thames Water Utilities	Addition of new Policy WLWP 7 in response to representation from Thames Water Utilities representation.
Policy WLWP 1 – Policy Purpose (text box)	Policy Purpose: Protecting, enhancing and optimising the existing network of waste sites so that sufficient suitable waste management capacity is provided for the Plan period as follows <u>as a minimum:</u> <u>and whilst</u> allowing for the reprovision of capacity at suitable locations within west...	Improved clarity	Addition of 'as a minimum' recognises that provision is a minimum position reflecting London Plan. Replacement of 'whilst' with 'and' less arcane language.
8.5	... There is also a provision in the London Plan that allows for <u>site</u> release without replacement capacity being provided where it is demonstrated there is already sufficient capacity to allow the London Plan apportionm...	Improved clarity	Addition specifies that the release referenced relates to a specific waste site.
8.5	... the London Plan apportionments to be met elsewhere in London and the capacity that would be lost is not required to ensure net self-sufficiency is met. ...	Improved clarity	Removal as London Plan apportionments may be met across London as a whole.
8.5	... is based on the assumption that the current capacity provided by existing waste sites across London is insufficient to meet the London Plan objectives...	Improved clarity	Removal of 'current' as applies to whole Plan period.
8.5	... the London Plan objectives and <u>apportionments</u> . targets	Improved clarity	Replacement aligns terminology with London Plan.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
8.8 (bullet list)	..., existing waste sites are defined as land that <u>can prove meet at least</u> can prove one of the following	Improved clarity	Correction of drafting artefact.
8.8 (bullet list)	...• where a Certificate of Lawful Existing Use or Development (CLEUD) for	Improved clarity	Addition introduces the sub-bullet correctly.
8.8 (bullet list)	...• a Certificate of Lawful Existing Use or Development (CLEUD) for <u>a</u> waste use has been granted	Improved clarity	Insertion of missing article as CLEUDs are specific to a use..
8.9 footnote 36	See <i>West London Waste Capacity Assessment</i> , 2025, BPP Consulting <u>and/or any subsequent update</u>	Future proof Plan	Included in case of future update.
8.10	...Proposals to develop a safeguarded waste site for waste management uses will be supported.	Improved clarity	Removal of 'management' as redundant.
8.11	...Proposals to redevelop a safeguarded waste site for a non-waste use will need to demonstrate that other existing <u>safeguarded</u> waste sites already provide sufficient capacity to meet ...	Improved clarity	Replacement of 'existing' with 'safeguarded' as that is the key operating condition.
8.11	..., and net self-sufficiency target for London as a whole..	Improved clarity	Removal aligns terminology with London Plan.
8.11	... before the change in use sought <u>is</u> may be consented.	Improved clarity	Replacement removes ambiguity.
8.12	... As per Policy SI 9 of the 2021 London Plan this should <u>be</u> in the first instance be located within the Plan area, but failing that, elsewhere within London. In either case, provision of the additional capacity must be capable of being secured through a legal agreement.	Improved clarity	Removal of wording to align with the London Plan.
8.16	... must be capable of entering into operation <u>to the level required as assessed under part F</u> , in accordance with part H of policy WLWP 1.	Reg 19 update	Deletion of part G of Policy changes reference and addition of 'level required' to ensure compensatory capacity is capable of operating at a the scale needed.
8.17	..., the safeguarding of the associated railhead or wharf <u>for waste transportation</u> will also cease, <u>while safeguarding of capacity for other uses continues to apply.</u>	Day GroupAggregate	Addition to distinguish between safeguarding cessation for waste use as opposed to other purposes such as minerals which will remain unaffected.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
Policy WLWP 1	A. Waste sites in west London will be safeguarded for their identified waste use unless otherwise identified for release <u>(see Appendix 6)</u> .	Reg 19 update	Cross-reference to Appendix 6 added, and wording on bespoke environmental permits.
(bullet list) E	...E. Opportunities should be explored to co-locate waste management facilities uses together.	Improved clarity	Removal of 'facilities' as 'waste uses' more accurate term for land-use planning.
(bullet list) E	and with complementary activities ³⁸ , provided cumulative effects remain acceptable ³⁸ <u>Such as activities that make use of the outputs of associated waste management operations.</u>	Quattro Rep	Addition of footnote to clarify what 'complementary activities' may include.
(bullet list) F	...In certain instances, the following will also be <u>given</u> relevant considerations a degree of weight:	Improved clarity	Removal of garbled phrase.
(bullet list) F	throughput capacity consented through a previous planning consent <u>or bespoke environmental permit</u>	Reg 19 update	Addition to reflect that fact that capacity set in a bespoke environmental permit may be a relevant factor.
(bullet list) G	G. If the capacity of the existing safeguarded waste site is shown to be surplus to requirement for London as a whole over the Plan period (and it can be demonstrated, where relevant, that this takes account of current and upcoming London Plan apportionment targets and net self-sufficiency targets), such sites could be released for other land uses. This approach should be applied by facility and waste type.	Mayor/ GLA representation	Removal of sub-clause G
(bullet list)	H. Provision of Replacement capacity must be capable of entering operation <u>to the level required</u> prior to commencement of the development which would result in the l...	Improved clarity	Removal of drafting artefact. Addition of 'level required' to ensure compensatory capacity is capable of operating at a the scale needed
8.18	Safeguarded <u>waste</u> sites are those waste sites whose capacity has been counted as contributing towards meeting the above need as listed in Appendix 2, unless they have been released from safeguarding <u>(see Appendix 6)</u> . <u>Safeguarding extends to other sites which meet the definition post adoption of the plan.</u> Following adoption of this Plan....	Improved clarity	Addition of a cross-reference to Appendix 6, and of text confirming that safeguarding extends to other sites meeting the definition post-adoption.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
8.19	When assessing 'wider market conditions' a holistic view should be <u>taken of current and emerging legislation, market trends, and changing composition and volumes of waste streams. This should be demonstrated through feasibility assessment to determine whether there is sufficient ongoing demand for the existing waste use to continue at the particular location, and robustly explores all reasonable alternative waste uses. Particular regard should be given to the potential for the site to accommodate other waste related or circular economy functions, across all relevant waste streams at an equivalent or higher level of waste hierarchy. Proposals should be supported by clear evidence, including trend analysis and market data, demonstrating that such reasonable alternatives have been considered.</u> The...	Improved clarity & Mayor/GLA rep	Addition of text to clarify evidence requirements for prospective applicants and reassure Mayor/GLA about how such requirements may be applied when site release is being considered.
8.21	...The most recent waste management capacity assessment <u>Capacity Assessment</u> demonstrates that there is <u>sufficient existing</u> a surplus of capacity in west London. This is needed for the management of current and forecast future waste arisings within the Plan area, plus that <u>apportioned via the London Plan to be managed appropriately.</u> Therefore, there is no identified need for development of additional capacity within the Plan area <u>for the Plan's objectives to be met.</u>	Improved clarity	Addition clarifies wording and relates existing capacity to London Plan apportionment more explicitly, and links provision of additional capacity more directly to the Plan's objectives.
8.22	... including through intensification of existing <u>safeguarded</u> sites...	Improved clarity	Addition relates specifically to existing safeguarded sites as per London Plan focus.
8.23	... development of additional capacity, for example to move the management of waste up the waste hierarchy or to provide <u>higher quality compensatory capacity to replace aging</u> existing waste infrastructure site is still encouraged.	Improved clarity	Addition reflects Policy WLWP 4 aim of high-quality design to achieve Plan Vision and Strategic Objectives.
8.23	...The London Plan (Policy SI 8 B4) identifies <u>the following</u> locations <u>as being suitable</u> for the provision of additional waste management capacity:	Improved clarity	Addition improves flow/meaning and connection to London Plan.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
8.23	...waste management. WLWP reflects the same approach as the London Plan Policy SI 8 B4 and supports development of waste management <u>capacity sites</u> providing it is located either on existing waste sites, or on industrial land identified as suitable in LPA Local plans, ...	Improved clarity	Addition relates text more specifically to capacity (which may be located on existing sites).
8.24 (?)	... Preferred locations are therefore those close to railheads and wharves <u>that can be used for waste transport</u> and/ or close to the strategic road network (motorways and trunk and principal roads).	Improved clarity	Addition links to objective of reducing road haulage.
Policy WLWP2 (bullet list)	...A. Proposals for additional waste management capacity will be supported in principle where they <u>satisfy at least one of the following criteria</u> :	Improved clarity	Addition makes clear the criteria are not additive.
(bullet list)	<u>Construction, Demolition & Excavation (C, D & E) Waste</u>	Reg. 19 update	Addition of waste-type heading to structure Policy WLWP 2 so clause B relates to waste category that follow.
(bullet list)	<u>1.</u> C. Proposals for capacity that will facilitate the use of C, D & E waste,...	Reg. 19 update	Addition of sub-number under the new waste-type structure for Policy WLWP 2.
(bullet list)	<u>2.</u> D. On major development sites..	Reg. 19 update	Addition of sub-number under the new waste-type structure for Policy WLWP 2.
(bullet list)	<u>Hazardous Waste</u>	Reg. 19 update	Addition of waste-type heading to structure Policy WLWP 2 so clause B relates to waste category that follow.
(bullet list)	<u>3.</u> E. Proposals for additional hazardous waste management capacity will be supported where ...	Reg. 19 update	Addition of sub-number under the new waste-type structure for Policy WLWP 2.
(bullet list)	<u>C.</u> F. Proposals for waste management capacity will be supported in principle where <u>at least one of</u> the following criteria are met:	Reg. 19 update	Renumbering of criterion under the restructured Policy WLWP 2 and addition to clarify application of criteria is not additive.
(bullet list)	It is demonstrated that:	Improved clarity	Removal of redundant phrase.
1	...1. It is located within the boundaries of a safeguarded waste site; or	Improved clarity	Removal of connective criteria are now introduced collectively by 'at least one of'..

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
2	... Sites (LSIS) provided they do not compromise these designations and allocations in development plans for non-waste development; or	Improved clarity	Removal of connective; criteria are now introduced collectively by 'at least one of'.
3	...he site is otherwise suitable for the proposed use and is consistent with the relevant development plan and its spatial strategy; and	Improved clarity	Removal of connective criteria are now introduced collectively by 'at least one of'..
(bullet list)	<u>In addition the following criteria should also be met:</u>	Improved clarity	Addition introduces second criteria set more clearly.
C5.	...t (rail or water) for the transportation of materials including waste to and from the site both during construction and operation (<u>where waste would be moved by rail or water this might allow unmet needs from outside west London to be met</u>); and	Environment Agency	Addition recognises potential to serve unmet needs from outside west London if movement by rail or water is an option.
8.25	...For facilities <u>proposals intended to manage</u> Household Commercial & Industrial (HIC) waste, either the combined current capacity of the safeguarded <u>waste sites (as assessed in Appendix 2 or any subsequent assessment based on planning consent)</u>) should be taken into account	Improved clarity	Replacement of 'facilities' with 'proposals' as more relevant wording. Replacement of 'planning consent' with 'assessment' as various sources may be used and the Appendix 2 assessment is the starting point.
8.25	...y will meet an identified need or enhance the range of waste management facilities available to serve the Plan area. <u>For example</u> , (e.g. a specialist facility to recover	Improved clarity	Replacement of e.g. with 'For example,' to improve clarity..
8.25	... For example, a specialist facility to <u>recover</u> ycle a waste or material not currently separately managed in the <u>Plan</u> area.	Improved clarity	Reference to 'recover' more generic.
8.26	...Proposals will be assessed as waste-related development if the <u>primary purpose is the management</u> use involves processing of waste, unless there is a clear case for them not to be dealt with	Improved clarity	Replacement for clarity.
8.29	The assessment of impacts shall include (but is not limited to) traffic, air quality, noise, vibration, odour, litter, visual impact, <u>biodiversity</u> and community safety and well-being as set out in Policy WLWP 4.	Herts & Middlesex Wildlife Trust Rep	Addition of 'biodiversity' to the list of matters to be considered.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
WLWP 3 Policy Purpose	...Where <u>proposals involve the provision of....</u>	Improved clarity	Addition to link to proposals for planning permission.
8.32	... via the use of district heating schemes. Other forms of energy from waste such a pyrolysis and gasification are sometimes termed classed as 'Advanced Thermal Treatment'.	Improved clarity	Replacement descriptor.
8.33	waste managed through EfW is counted alongside waste disposed to landfill and waste converted to RDF <u>regardless of its recovery status.</u>	Improved clarity	Addition of 'regardless of its recovery status.' to clarify the scope of the Regulations.
8.34	... indicates that there is no identified need for EfW capacity to be developed in west London, and the LPAs are currently unaware of any specific proposals for such capacity , given this form of waste management has certain characteristics which need particular consideration, Policy WLWP 3 is included ...	Reg. 19 update	Removal as wording may date.
8.36	...bustion of the biogenic elements of residual waste can generate low- carbon renewable energy, whereas burning non-biogenic waste, which includes materials like <u>such as</u> oil-based plastics, does not....	Improved clarity	Replacement to improve flow.
8.37	... reduction in waste management is anticipated to result from increased recycling, which should not be undermined by the <u>provision</u> creation of additional-extra EfW capacity	Improved clarity	To improve flow..
8.39	EfW is likely to remain an essential part of waste management infrastructure <u>in the medium term at least</u> especially if the management of unavoidable residual waste including.	Improved clarity	Addition of 'in the medium term at least' to qualify the statement and reflect the longer term aspiration to reduce residual waste.
Policy WLWP3 (bullet list)	...Is for the final management of residual waste by either 'other recovery' or disposal will only be supported if it is demonstrated <u>all of the following criteria are met</u> :	Improved clarity	Addition makes clear all criteria apply.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
1	... the waste to be managed constitutes unavoidable residual waste that cannot practicably be managed higher up the waste hierarchy, and	Improved clarity	Removal of connective; criteria are now introduced collectively.
2	...2. the proposals are in accordance with the proximity principle , and	Improved clarity	Removal of connective; criteria are now introduced collectively.
E	1. they qualify as a recovery operation as defined in the <u>retained EU Waste Framework Directive</u>	Improved clarity	Improve accuracy
E	2. the release of non-biogenic gaseous carbon emissions will be minimised, with mechanisms to capture for use and/or storage if use (and prevention) is not viable y , incorporated into facility design; and	Improved clarity	Improve meaning/flow.
8.42	...All waste related development Where waste capacity is developed should be of high quality and contribute to the achievement of other national and development plan policies and objectives including reducing greenho...	Improved clarity	Application of Policy broadened to all waste related development, not just that relating to provision of waste capacity.
8.42	protection and enhancement of the environment (including the water environment) and, <u>biodiversity, heritage assets, archaeology and the historic environment</u>) and the protection of amenity and health.	Colne Valley Regional Park Rep & Historic England	Criteria added to cover broader considerations raised by representors including Historic England.
8.43	Policy WLWP 4 provides a range of criteria to ensure <u>prospective</u> developers consider and mitigate the impacts of their <u>proposed</u> development on the environment, the community and the appearance of the local area. <u>While the</u> criteria detailed in <u>this the</u> Policy has been tailored to the specific waste requirements <u>characteristics of waste management facilities</u> , it should not be read as an exhaustive list. Other policy areas may be relevant to specific <u>types of developments or locations</u> and applicants are advised to refer to other relevant policies set out in the London Plan, Borough or OPDC Local Plans, development management policy documents, site allocations and <u>other local plan documents</u> area action plans as appropriate.	Improved clarity	To steer applicants early, and make more generic..

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
8.44	High quality Development design <u>that is sensitive to its context</u> is crucial in managing and reducing adverse impacts of waste related development on the environment, amenity, and sensitive receptors.	Improved clarity	Improved meaning
8.45	... the operational requirements of existing and future businesses <u>uses including aerodromes</u> , ensuring that potential conflicts will be adequately mitigated in accordance with the London Plan 2021 Policy D13 Agent o...	MoD Rep	Made more generic with specific reference to aerodromes.
8.46	The Proposed development is expected to <u>should</u> be designed to be resilient to...	Improved clarity	Wording more definite.
8.47	... Where development relies <u>is intended to rely</u> on road based transport, there must not be any significant or unacceptable adverse impacts on the local road network or other road users	Improved clarity	In future, rather than actual.
8.47	Proposals should demonstrate that adequate parking for all vehicles is available on <u>the proposed development</u> site.	Improved clarity	Addition of 'the proposed development', to clarify the wording.
8.48	 As a general principle, proposed development should have no significant adverse effects on local biodiversity (<u>applying the mitigation hierarchy of avoiding and minimising adverse impacts, before offsetting or compensating for damage</u>) and opportunities to enhance biodiversity and green infrastructure on and around the site should be maximised to improve visual amenity and provide ecological benefit. <u>Biodiversity net gain should also be secured in line with the statutory framework and any local policy requirements set out in the development plans of each WLLPA.</u> In addition, proposed developments will be required to conserve and avoid harm to, or loss of significance of any heritage assets such as conservation areas, archaeological sites, listed buildings (etc.) unless <u>strong</u> justification is provided.	Herts & Middlesex Wildlife Trust Rep	Addition of text on applying the mitigation hierarchy and on securing biodiversity net gain in line with the statutory framework, and of 'strong' before 'justification'.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
8.49	Environmental permitting provides the appropriate mechanism for control of operational impacts <u>from pollution</u> and should be assumed to operate efficiently though it is strongly recommended that applicants consider these matters in tandem with the planning application and seek early advice from the Environment Agency. The need to enclose operations may be prescribed under environmental permitting and such requirements will normally require express planning consent. <u>Where proposed developments give rise to effects that may adversely impact communities or areas outside the Plan area, consideration should be given to how these will be mitigated, with particular regard being given to any particularly sensitive receptors.</u>	Improved clarity Spelthorne Borough Council rep	New text added requiring consideration of how effects on communities or areas outside the Plan area will be mitigated, with particular regard to sensitive receptors.
Policy WLWP 4 (policy text box)	i. avoid unacceptable adverse impacts arising <u>from air and waterborne contaminants and other emissions</u> , noise, dust, litter, vermin, vibration, odour, bioaerosols, external lighting, visual intrusion, traffic, <u>birdstrike</u> or associated risks to the environment and health and wellbeing of local communities;	Ministry of Defence / Heathrow Airport/ Colne Valley	Additions within Policy WLWP 4 criterion (i): 'air and waterborne contaminants and other emissions' from adopted WLWP and addition of 'birdstrike'.
WLWP5 (bullet list)	...The Policy Purpose: To ensure that the landfill <u>ing</u> of non-inert waste is minimised (in accordance with the waste hierarchy) ...	Improved clarity	Completion of the truncated word 'landfilling' which is the action.
8.50	Such wastes are generated in comparatively limited amounts and are generally handled at specific landfill sites <u>which may be specifically</u> designated for hazardous waste or within specially constructed cells at non-inert landfill sites.	Improved clarity	

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
8.52	In light of this, the provision of new capacity is largely reliant on the presence of certain geological and hydrogeological conditions needed to <u>that</u> minimise the risk of groundwater pollution. While being a potential pollutant, landfill gas can be captured and put to use as a fuel to produce energy. <u>It should also be noted that such facilities can increase risk of birdstrike by aircraft. The Plan area includes RAF Northolt and Heathrow Airport subject to Aerodrome Safeguarding Zone, and development must not compromise aircraft safety or restrict the operational capability of these aerodromes. Applicants proposing developments that may attract scavenging birds within the Aerodrome Safeguarding Zones are encouraged to engage with airport operators at an early stage to ensure proposals are in compliance with relevant restrictions and will not compromise aircraft safety.</u>	Ministry of Defence / Heathrow Airport	Addition of text on the risk of birdstrike to aircraft, noting the RAF Northolt and Heathrow Airport Aerodrome Safeguarding Zones and the need for applicants to engage with airport operators.
8.57	...ed 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 <u>achieving</u> net self-sufficiency by 2026 does not apply to excavation waste in particular.	Improved clarity	Align terminology with London Plan.
Policy WLWP5 (bullet list)	...o take account of, and where appropriate, enhance the surrounding landscape, topography and the natural and historic environment, <u>and protect water quality</u> .	Colne Valley Regional Park Rep	Addition recognises water-quality protection as a material consideration for landfill development.
8.58	This means, therefore, that proposals <u>for waste related development</u> coming forward should be designed so that materials <u>used in their construction and the waste they intend to manage</u> are kept in use for as long as possible, via reuse and repair, and high quality locally relevant recovery	Improved clarity	Makes more specific to developments within scope of WLWP.
8.59	...Integrating circular economy principles into waste management <u>and</u> related development <u>can</u> deliver a wide range of environmental, social and economic benefits.	Improved clarity	Broadens to all types of development within scope of WLWP.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
8.59	Waste-related Development designed to support repair, remanufacturing, recycling and innovative reuse centres can support local job creation in emerging green indu...	Improved clarity	Removal of redundant qualifier.
8.60	...Planning will need to <u>has a role</u> to play in delivery of the necessary infrastructure to facilitate the circular economy ...	Improved clarity	More definite terms.
8.60	The co-location of waste uses with complementary industrial uses will be supported where it <u>demonstrably</u> enhances resource efficiency.	Improved clarity	Addition tightens policy requirement.
8.64	 The retention of healthy soil structure is essential and can be aided by minimising the installation of hard surfaces on development sites...	Improved clarity	Removal shifts to practical emphasis.
Policy WLWP 7	<u>Policy WLWP 7 Provision of Wastewater Treatment Infrastructure and supporting text added</u>	Thames Water Utilities	Addition of the new Policy WLWP 7 title in response to representation from Thames Water Utilities.
Chapter 9: Policies Map			
9.1	...The Policies Map for the Plan comprises location maps of the existing waste sites proposed to be safeguarded shown in Appendix 3.	Reg. 19 update	Removal of 'proposed' at Reg. 19 stage.
Glossary (Appendix): Glossary			
10 (bullet list)	...The combined waste produced from <u>the construction of new buildings/structures and associated demolition of existing buildings/structures</u> . It mostly comprises brick, concrete, hardcore, , but can also include timber, metals, <u>plasterboard</u> and plastics.	Improved clarity	Removal of 'combined' as redundant in the definition. Addition of plasterboard to non-inert list reflects scope of C&D waste.
10 (bullet list)	...of new buildings/structures . It mostly comprises brick, concrete, hardcore, , but can also include timber, metals, and plastics. <u>Excavation waste primarily arises from groundworks and earth moving, and consists of subsoil and topsoil.</u>	Improved clarity	Addition distinguishes excavation waste.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
Chapter 10: Appendices			
Appendix 1	Removal of the trailing sentence: ' Results will be reported in Authority Monitoring Reports. '	Improved clarity	Stated below.
Appendix 1 — Delivery Responsibility list (LPAs)	Local Planning Authorities (LPAs): <u>determine planning applications against policies and grant planning permission.</u> ...; ' apply policies through development management ' → ' <u>of their</u> ' decisions; <u>enforce against unlawful activities.</u>	Improved clarity	Expanded description of LPA monitoring responsibilities to cover determining applications, granting permission, and enforcing against unlawful activities.
SO1 - Ref 1	...Ensure local capacity is sufficient <u>capacity to meet</u> London Plan apportionments are met for duration of Plan period	Improved clarity	Insertion completes objective.
SO1 - Ref 1	<u>Maintain</u> Provide sufficient qualifying capacity to meet collective WLWP London Plan apportionments <u>and any capacity sharing agreements.</u>	Improved clarity	Addition of 'Maintain' for active formulation. Capacity sharing added in anticipation that this may be required.
SO1 - Ref 1	...Local planning authorities (LPAs), <u>GLA</u> , Waste Industry, Environment Agency (EA) WLWA (LACW)	Improved clarity	Addition of GLA to the list of monitoring data sources reflecting its role in reporting on London wide state of net self sufficiency.
SO1 - Ref 2	...C & D waste arisings are less than, or equivalent to, C&D waste <u>management</u> capacity in west London (WL)	Improved clarity	Insertion of 'management' for precision.
SO1 - Ref 4	...No net loss of safeguarded HIC waste management capacity <u>unless lack of London-wide need demonstrated</u>	Improved clarity	Addition qualifies the 'no net loss' target to allow site release where London-wide need does not require the capacity.
SO1 - Ref 4	<u>GLA monitoring data for London-wide net self sufficiency</u>	Improved clarity	Addition of GLA data source reflecting its role in reporting on London wide state of net self sufficiency..
SO1 - Ref 5	...No net loss of safeguarded C&D waste management capacity <u>unless lack of London-wide need demonstrated</u>	Improved clarity	Addition qualifies the 'no net loss' target to allow site release where London-wide need does not require the capacity.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
SO1 - Ref 5	<u>GLA monitoring data for London-wide net self sufficiency</u>	Improved clarity	Addition of GLA data as the source for the London-wide net self-sufficiency indicator.
SO1 - Ref 5	...LPAs, developers, <u>GLA</u>	Improved clarity	Addition of GLA to the list of monitoring bodies.
SO1 - Ref 6	...No net loss of safeguarded hazardous waste management capacity <u>unless lack of London wide need demonstrated</u>	Improved clarity	Addition qualifies the 'no net loss' target to allow site release where London-wide need does not require the capacity.
SO1 - Ref 6	<u>GLA monitoring data for London-wide net self sufficiency</u>	Improved clarity	Addition of GLA data as the source for the London-wide net self-sufficiency indicator.
SO1 - Ref 6	...LPAs, developers, <u>GLA</u>	Improved clarity	Addition of GLA to the list of monitoring bodies.
SO1 - Ref 7	...WLWP 1 & <u>WLWP 7</u>	Thames Water Utilities	Policy reference updated to include new Policy WLWP 7.
SO2 Ref 13	...100% of newly consented waste management <u>capacity</u> facilities in locations <u>specified</u> described in WLWP2	Improved clarity	'Capacity' is the correct metric for the monitoring target. 'Specified' is more precise than 'described' for locations set out in policy.
SO3 Ref 15	...No net loss of rail/water freight capacity <u>for waste purposes</u> unless associated waste use lost.	Improved clarity	Addition specifies scope to waste purposes

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
Appendix 2			
B12	... 185 399 ,000	British Land Rep	Capacity figure amended to reflect peak actuals rather than assessed capacity.
B02	Bridgemarts <u>Urban Prop 8 S.A.R.L</u>	URBAN PROP 8 SARL Rep	Replacement of 'Bridgemarts'. : 'Urban Prop 8 S.A.R.L'.
E01	<u>HWRC</u> Transfer	Improved clarity	'HWRC' is more accurate term.
E02	...Acton <u>Circular Economy Hub</u> Waste & Recycling Centre	Reg. 19 update	The old 'Waste & Recycling Centre' is now consented as a 'Circular Economy Hub'.
E02	<u>SUEZ Recycling & Recovery UK Ltd</u> Ealing Council	Reg. 19 update	Update of operator.
E02	<u>HWRC</u> Transfer	Improved clarity	'HWRC' is more accurate term.
E02	<u>55 3881</u>	Reg. 19 update	Capacity figure superseded by updated value.
E05	<u>10,097 3099</u>	Bambra Rep	Capacity figure superseded by updated value.
E05	...CDEW <u>& HIC</u>	Bambra Rep	Waste type updated to 'CDEW & HIC' to reflect actual operations on site.
E07	<u>CLEUD</u> Lawful over time	Quattro Rep	Lawfulness basis updated to a more formal designation.
E014	<u>46,51610,928</u>	Bambra Rep	Capacity figure superseded by updated value.
E014	...CDEW <u>& HIC</u>	Bambra Rep	Waste type updated to 'CDEW & HIC' to reflect actual operations on site.
E15	<u>30,046 101,003</u>	Mayor/GLA Rep	Updated capacity figure.

Paragraph no.	Proposed Change (new text underlined, deleted text strikethrough)	Reason for change	Comments
E20	...Wards of London Properties Ltd <u>(Rail Logistics Ltd)</u>	URBAN PROP 8 SARL Rep	Operator name added alongside permit holder.
HI01	<u>68,057</u> 75,000	Mayor/GLA Rep	Capacity figure superseded by updated value.
HI14	HI14 WTS Off Rigby Lane Talking Rubbish Waste Solutions Limited	Reg. 19 update	Site removed — site no longer included in the safeguarded sites list as not lawful.
HO07	<u>555,000</u> 750,000	Days Rep	Capacity figure superseded by updated value.
R04	<u>13,404</u>	Reg. 19 update	Capacity figure added.
Appendix 5			
11.3	Data for the amount of C&I waste produced is not readily available as businesses are not currently required to report on waste produced. The London Plan 2021 estimates that this waste stream represented 28% of total waste arisings in London in 2015. This compares with household waste at 17% and C,D & E waste at 54%. If that percentage is applied to the LACW arisings for West London above, it indicates that arisings in the Plan area may be in the region of 1 million tonnes per annum.	Improved clarity	Removal of the sentence estimating LACW arisings in the Plan area in the region of 1 million tonnes per annum as unnecessary.
11.7	..., or managed as non-waste under the Contaminated Land: Applications in Real Environments definition of waste protocol <u>(DoWCoP)</u> .	Improved clarity	Addition of the abbreviation '(DoWCoP).'