

West London Waste Plan – Emerging Draft Strategic Flood Risk Assessment



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Executive Summary

In West London, six London Councils and the Old Oak and Park Royal Development Corporation (OPDC) (the Mayor of London's statutory Mayoral Development Corporation) are working together to update the West London Waste Plan (WLWP) adopted in 2015. This plan will form part of the development plan for each of their respective areas and be used when determining waste related planning applications. For the OPDC, this only includes the areas within Brent and Ealing.

Flooding is a key consideration in terms of the expansion and development of waste sites at locations throughout West London, and therefore this report assesses the flood risk associated with the proposed approach to the safeguarding of waste management capacity and provision for its expansion where appropriate. This Strategic Flood Risk Assessment (SFRA) has been prepared to enable the seven West London Local Planning Authorities (LPAs) to understand the implication of its preferred strategy for the WLWP. It provides a strategic overview of the flood risk implications in West London, based on the current SFRA production process, to meet statutory requirements for the LPAs in the updated WLWP. This includes the West London SFRA (produced for the London Boroughs (LBs) of Brent, Ealing, Harrow, Hillingdon and Hounslow), and the LB of Richmond upon Thames SFRA.

This document addresses the relevant national, regional, and local policies which need to be considered in terms of flood risk. The latest policy requirements are identified, including where policy has been updated since the previous WLWP was adopted. The local requirements that this SFRA addresses include the impacts of climate change, localised flood risk issues, and specific policies and interpretations of the Flood Zones.

West London is subject to flood risk from a variety of sources which include: fluvial, tidal, surface water, sewer, groundwater, and artificial sources of flood risk. The flood risk maps produced as part of the West London and Richmond upon Thames SFRAs are used to indicate the level of flood risk within West London. This document and the associated maps serve to address statutory requirements and manage flood risk.

This SFRA has not been produced as a full SFRA as there are no additional sites proposed as part of the updated WLWP. No changes are planned to be made to land proposed to be allocated, other than the release of a limited number for non-waste uses which will in turn be subject to planning applications where flood risk will be considered. Therefore, this SFRA summarises updates to policy and flood risk which have taken place since the WLWP was produced, with a current analysis of flood risk and further guidance should development be required in the future. This includes the potential for changes that could be made to existing sites, or the addition of windfall sites.



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Acronyms and Abbreviations

Abbreviation	Definition
AEP	Annual Exceedance Probability
BNG	Biodiversity Net Gain
DPD	Development Plan Document
EA	Environment Agency
FCERM	National Flood and Coastal Erosion Risk Management
FRMP	Flood Risk Management Plans
FWMA	Flood & Water Management Act
GLA	Greater London Authority
LB	London Borough
LDF	Local Development Framework
LLFA	Lead Local Flood Authority
LFRMS	Local Flood Risk Management Strategy
LPA	Local Planning Authority
LSDAP	London Sustainable Drainage Action Plan
NPPF	National Planning Policy Framework
NPPW	National Planning Policy for Waste
OPDC	Old Oak and Park Royal Development Corporation
PPG	Planning Practice Guidance
RMA	Risk Management Authority
SAB	SuDS Approving Body
SFRA	Strategic Flood Risk Assessment
SuDS	Sustainable Urban Drainage Systems
SWMP	Surface Water Management Plan
NAP3	Third National Adaptation Programme
TE2100	Thames Estuary 2100
TRBD	Thames River Basin District
TfL	Transport for London
TWUL	Thames Water Utilities Limited
WLWP	West London Waste Plan



1 Introduction

1.1 Background

The West London Waste Plan (WLWP) is a joint development plan document (DPD) and covers the geographical area comprising the London Boroughs (LBs) of Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond upon Thames, and the Old Oak and Park Royal Development Corporation (OPDC)¹. It contains policies to guide the determination of planning applications for waste related development and identifies existing waste sites to be safeguarded and that may also be suitable for redevelopment / intensification.

The current WLWP was adopted in 2015 and set out a strategy and policies for the sustainable management of all waste produced within the Plan area for the period up to 2031. Local Plans are required to be reviewed every 5 years, and as the waste plan is being updated, an updated Strategic Flood Risk Assessment (SFRA) is also required as outlined by the Flood Risk and Coastal Change Planning Practice Guidance (PPG).

When developing a local development plan, the risk of flooding must be considered in line with the PPG and therefore this SFRA accompanies the WLWP to fulfil this role and assess the flood risk associated with the preferred strategy for the provision of waste management capacity.

A full SFRA is not necessary in this case as there are no additional sites being proposed, and no changes currently proposed to the existing sites as part of the WLWP. Although it is acknowledged that windfall sites may come forward. Therefore, this SFRA has been prepared with this in mind, and provides an overview of the updated policies, current flood risk, and further guidance on the preparation of Flood Risk Assessments. Further analysis has been undertaken of the existing sites identified for safeguarding in the updated WLWP which includes a summary of each site (*Appendix A – Sites*) and further detail including mapping (*Appendix B – Site Specific Flood Risk Analysis*) to summarise the existing flood risk at each site. This will allow for further analysis should any amendments be proposed to the existing sites.

1.2 Methodology

The main sources of information used for this SFRA have been taken from the current borough SFRA reports, including the West London SFRA (2024) and Richmond upon Thames SFRA (2021). Further information can be found in *Sections 2.4.1* and *2.4.2*. The data sourced from these SFRAs includes, but is not limited to the following:

- Detailed flood risk mapping

¹ In relation to the parts of Brent and Ealing that falls within the ODCP.



- Flood Zones (Environment Agency (EA) and Local Authority)
- Historical flooding information
- Sewer flooding records
- Groundwater flooding information

The data listed above and used in the SFRAs were in turn sourced from the respective Borough Councils, the EA, and Thames Water Utilities Limited (TWUL).

Shapefiles for the existing sites were also received from each LPA to analyse the current flood risk at each site. The most up to date Flood Zones and Risk of Flooding from Surface Water data was downloaded to allow for a current analysis of flood risk at each site. Flood Zone 3b was also used from the borough SFRAs to compare with the sites. No additional data has been requested from the sources referenced to aid the production of this report.



2 Planning Policy Updates

2.1 Overview

This section serves to outline the various requirements, policies, and strategic documents that are relevant to assessing flood risk across West London. These are at national, regional, and local levels, each of which are summarised below. Where possible, hyperlinks to the referenced source material have been provided.

2.2 National Policy

2.2.1 Town and Country Planning Act 1990

The [Town and Country Planning Act \(1990\)](#) regulates land development in England and Wales, providing a statutory definition of ‘development’ and a legal framework for the planning system. The Act deals with matters including:

- The roles and responsibilities of Local Planning Authorities (LPAs).
- Control over development, including development orders, planning permission, and appeals.
- Enforcement of planning law, including stop notices.

2.2.2 Planning and Compulsory Purchase Act 2004

The [Planning and Compulsory Purchase Act \(2004\)](#) amended and repealed parts of the Town and Country Planning Act 1990. It sets out specific matters to which the LPA must have regard when preparing a Local Plan. [Regulations 8 and 9 of the Town and Country Planning Regulations 2012](#) prescribe the general form and content of Local Plans and adopted policies maps, while [regulation 10](#) states what additional matters LPAs must have regard to when drafting their Local Plans. It is designed to accelerate the planning process, making planning decisions more predictable and providing a more sustainable approach to planning.

The [Localism Act 2011](#) gave some planning rights and powers back to Local Authorities and local communities to give people at the local level the freedom and flexibility to achieve their own ambitions and aspirations for their area. This act, together with the NPPF, consolidated the plan preparation process, replacing the term ‘Local Development Framework’ with the term ‘Local Plan’.

2.2.3 Flood and Water Management Act 2010

The [Flood and Water Management Act \(FWMA\) 2010](#) provides a framework for managing flood risk across England and Wales. The FWMA identifies the EA, Lead Local Flood Authorities (LLFAs), local Councils (where there is no unitary authority), Internal Drainage Boards, Water and Sewerage Companies, and Highway Authorities as Risk Management Authorities (RMAs) and defines their roles and responsibilities. Brent, Ealing, Harrow, Hillingdon, Hounslow, and



Richmond upon Thames Councils are all LLFAs under the FWMA (the OPDC is not a LLFA) and have the following responsibilities:

- Managing flood risk from local sources (surface water, groundwater, and ordinary watercourses).
- Regulating works on ordinary watercourses.
- Developing, maintaining, and applying a Local Flood Risk Management Strategy (LFRMS).
- Investigating and recording key local flood incidents.
- Designating structures or features that significantly impact flood risk.
- Maintaining a flood risk asset register.
- Sharing information about flood risk.

Schedule 3 of the FWMA relates to sustainable drainage in new developments and has yet to be enacted in England. It sets out a framework for approving and adopting drainage systems, a SuDS Approving Body (SAB), and national standards for designing, constructing, operating, and maintaining Sustainable Drainage Systems (SuDS) for the development lifetime. It also makes the right to connect to public sewers conditional upon the drainage system being approved before construction work can start. Upon Schedule 3's implementation, the LPAs must therefore ensure that its requirements are incorporated within new developments.

2.2.4 Environment Act 2021

The [UK Environment Act](#) came into force in November 2021, and serves as the UK's new framework of environmental protection following its departure from the European Union. The Act retains previous environmental protection into law, whilst providing new powers to set binding targets for priority areas. These priority areas are water, air quality, biodiversity, waste, and resource efficiency.

The Act places duties on the Government regarding environmental governance, with actions including the requirement to set at least one long-term target for each priority area, to put in place processes for setting and amending long-term targets, and to have an Environmental Improvement Plan that outlines the steps necessary to improve the natural environment over a period of at least 15 years.

The Environment Act 2021 introduced the mandatory Biodiversity Net Gain (BNG) requirement for new development in England, which became mandatory for most new developments in January 2024. BNG is a requirement for developers to contribute to nature recovery through ensuring wildlife habitats are in a better state than prior to development. Further information, including the types of development that are exempt can be found [here](#).

2.2.5 UK Climate Change Adaptation Policy 2021

The UK [Climate Change Adaptation Policy](#) paper was published in June 2021, and was updated in August 2022. This policy details how preparing for climate change through undertaking climate adaptation will help reduce the negative impacts and take advantage of new



opportunities across the UK. The Third National Adaptation Programme (NAP3) was published in July 2023 and sets out the actions that the Government and others will take to help the UK adapt to the impacts of climate change from 2023 to 2028. This sets out a strategic five-year plan to boost resilience and protect people, homes, businesses and our cultural heritage against climate change risks such as flooding (from all sources, as outlined further in this SFRA), drought, and heatwaves.

2.2.6 National Flood and Coastal Erosion Risk Management Strategy 2022

The [National Flood and Coastal Erosion Risk Management \(FCERM\) Strategy](#) was published in July 2020 by the EA, with the strategy being most recently updated in June 2022. Climate change and the associated increased risk of flooding and coastal change is identified as a significant challenge within the National FCERM Strategy. The Strategy sets out the practical measures to be implemented by Risk Management Authorities (RMAs), partners, and communities, which will contribute to longer-term delivery objectives and the Government's vision of "a nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100". The Strategy has three core ambitions concerning future risk and investment needs:

- Climate resilient places: increasing nation-wide resilience to flooding and coastal change through bolstered partnership working.
- Today's growth and infrastructure resilient in tomorrow's climate: taking the correct planning decisions and investment to ensure resilient infrastructure, environmental improvements, and sustainable growth.
- A nation ready to respond and adapt to flooding and coastal change: ensuring local people understand their risk to coastal change and flooding, their responsibilities, and how to take action.

Alongside the final Strategy, the EA has developed an [FCERM Roadmap to 2026](#), (to coincide with the next scheduled review), published in 2022 to provide a longer-term view to implementing the strategy. This roadmap was developed between the EA and partners including National Highways and the National Flood Forum (a charity which helps, supports and represents people at risk of flooding) to set out various practical actions to be undertaken up until 2026, with completion of these actions helping ensure progress towards implementing the Strategy's 2100 vision.

2.2.7 Flood Risk and Coastal Change Planning Practice Guidance 2025

The PPG states that minerals and waste planning authorities need to take account of flood risk when allocating land for development, including preparing their plan policies with regard to any available SFRAs. They should apply the sequential approach (ensuring that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk) to the allocation of sites for waste management and, where possible, mineral extraction and processing.



The PPG sets out how flooding and coastal change related risks are to be considered and addressed within the land use planning process. This includes discussing how LPAs can apply the sequential approach to locating developments, understanding flood risk issues, using SuDS to manage surface water flood risk, and improving property flood resistance and resilience. The ‘Flood Risk and Coastal Change’ section of the PPG also provides the most recent guidance for how to prepare a SFRA.

The role of the Sequential Test is outlined which ensures that a sequential approach is followed to steer new development to areas with the lowest risk of flooding. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites (within medium risk areas, and, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas). Following application of the Sequential Test, before development is allowed to be allocated or permitted in situations where suitable sites at lower risk of flooding are not available, the Exception Test must be applied which requires additional elements to be satisfied. Further information on the application of the Sequential and Exception Tests can be found in *Section 4.2*.

2.2.8 National Planning Policy Framework 2025

The National Planning Policy Framework (NPPF) sets out the Government’s planning policies across England and how these should be applied. It provides a framework within which plans for housing and other developments can be produced by LPAs and also provides guidance for prospective applicants for submitting planning applications. Paragraph 20 of the NPPF states that strategic policies should set out an overall strategy and make sufficient provision for infrastructure for waste management. The NPPF should be read alongside the National Planning Policy for Waste (NPPW) 2016, in the context of waste management.

Chapter 14 of the NPPF encompasses the requirement to meet the “challenge of climate change, flooding and coastal change”, with paragraphs 165-175 relating specifically to “Planning and floodrisk”. Paragraph 166 emphasises the importance of SFRAs and their roles in planning and flood risk, stating the following:

“Strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.”

Paragraphs 167-174 of the NPPF summarise the Sequential and Exception Tests as a tool to encourage new development proposals to be located within areas that are at the lowest flood risk. This SFRA provides the basis for applying the Sequential and Exception Tests, with guidance for their application provided within *Section 4.2*.



2.3 Regional Policy

2.3.1 London Sustainable Drainage Action Plan 2016

Published in 2016 by the Greater London Authority (GLA), the [London Sustainable Drainage Action Plan](#) (LSDAP) addresses the flood risk challenges to London's drainage and sewer system posed by a combination of population growth, climate change, and land use changes. As increased foul water discharges and surface water runoff have often resulted in the over-utilisation of London's existing drainage infrastructure, the LSDAP has been produced to help implement a reduction to the increasing flood risk. The LSDAP focuses on retrofitting SuDS to existing infrastructure, land, and buildings. The aim is to identify when and where other planned maintenance, repair or improvement works are scheduled and then to identify opportunities to retrofit sustainable drainage as part of those works.

The LSDAP aims to set the direction for the next 20 years, but also provides 40 shorter-term actions which require the GLA to undertake collaborative work with RMAs including TWUL, the EA, the LBs, and Transport for London (TfL). These actions include delivery of SuDS projects, wider policy improvements, and the identification of opportunities to improve implementation of SuDS in schools, transport schemes, and housing. Building on this foundation, the [London Surface Water Strategy](#) was developed which sets out a series of actions and recommendations to be progressed to deliver transformational change, further information is provided in *Section 2.3.4*.

2.3.2 London Plan 2021

The London Plan is the GLA's spatial development strategy for London, which the Mayor must publish under the legislation establishing the GLA. The Plan was prepared in accordance with the [GLA Act 1999](#), and sets out a unified environmental, economic, transport, and social framework for development in London from 2019 to 2041. The [current London Plan](#) was adopted in March 2021.

Chapter 9 of the London Plan discusses 'Sustainable Infrastructure' and includes various policies that relate to climate change, flood risk and water management, and waste management. The key policies relevant to the update of the WLWP to which this SFRA relates are summarised below:

- **Policy SI 7 Reducing waste and supporting the circular economy:** Resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal.
- **Policy SI 8 Waste capacity and net waste self-sufficiency:** London's waste should be managed sustainably and criteria are provided for development proposals when planning for new waste sites or to increase the capacity at existing sites.
- **Policy SI 9 Safeguarded waste sites:** Existing sites should be safeguarded and retained in waste management use, development proposals for the relocation of



waste sites within London are supported where strategic waste management outcomes are achieved.

- **Policy SI 12 Flood risk management:** Current and expected flood risk from all sources across London should be managed in a sustainable and cost-effective manner. This policy also sets out requirements for Developments Plans and development proposals.
- **Policy SI 13 Sustainable drainage:** This policy provides an updated drainage hierarchy (from that under the previous London Plan Policy 5.13) which development proposals must adhere to when managing surface water runoff. Proposals should aim to achieve greenfield runoff rates and manage surface water runoff as close to its source as possible, using sustainable solutions to reduce runoff rates and volumes. To achieve this, development proposals should seek to include SuDS features to provide multiple benefits through their drainage scheme. LFRMS and Surface Water Management Plan (SWMP) documents produced by LLFAs should identify areas with specific surface water management issues and aim to reduce these risks.
- **Policy SI 17 Protecting London's waterways:** New developments should support river and watercourse restoration, and developments which facilitate the protection of water spaces and their characteristics (with a particular priority for improving and restoring them) should be supported.
- **Policy GG6 Increasing efficiency and resilience:** Those involved in development and planning must guarantee that buildings and infrastructure should be designed to adapt to climate change, reduce flooding impacts, and utilise water efficiently.
- **Policy D11 Safety, security and resilience to emergency:** Development proposals should maximise building resilience and minimise potential physical risks that may arise from various hazards, including flooding.

2.3.3 Thames River Basin District Flood Risk Management Plan 2022

The most recent version of the [Thames River Basin District \(TRBD\) Flood Risk Management Plan \(FRMP\)](#) was published in December 2022. It is a joint plan prepared and developed under the [Flood Risk Regulations 2009](#) (now revoked). It also contributes towards helping to deliver the ambitions of the National FCERM Strategy, and the government's [25-Year Environment Plan](#). The EA and other RMAs worked together to develop the first cycle FRMP, which was produced in 2015. The second cycle (2021 to 2027) builds upon the approach that was taken.

This Plan outlines how RMAs will plan for and manage the risk of flooding to all communities within the TRBD from 2021 to 2027. There are 18 national objectives within the current FRMP cycle, all of which apply to the TRBD area and outline the primary areas in which RMAs should aim to make improvements. These objectives are outlined within the FRMP national overview and fall within one of one of three categories that are consistent with the National FCERM Strategy ambitions of:

- Climate resilient places.



- Today's growth and infrastructure resilient in tomorrow's climate.
- A nation ready to respond and adapt to flooding and coastal change.

2.3.4 Thames Estuary 2100 Plan 2023

The [Thames Estuary 2100 \(TE2100\) Plan](#) was developed by the EA and provides strategic direction for managing flood risk in the Thames Estuary to the end of the century. The TE2100 plan is an adaptive strategy and is reviewed on an interim basis every five years and on a full basis every ten years. The plan considers different long-term options for managing tidal flood risk depending on changes in factors which determine the level of flood risk, including sea level rise. The Thames Estuary is divided into 23 areas called 'policy units'. These affect Hounslow and Richmond upon Thames Councils. Each policy unit explains how to manage flood risk in that area.

2.3.5 London Surface Water Strategy 2025

Following severe flooding in 2021, the Mayor of London convened a roundtable of key stakeholders to discuss how to improve the response to, and reduce the impact of, surface water flooding. These discussions led to the establishment of a Task and Finish Group which identified key areas of further work and recommendations, including establishing a Surface Water Strategic Group for London.

An [Interim Report](#) was produced in July 2024, prior to the [final version](#) of the strategy being published in May 2025. The finalised report sets out a vision of how London can address the increasing risk of surface water flooding between 2025 and 2030. Six guiding principles underpin this work:

- Prioritise the most vulnerable
- Prioritise nature-based solutions
- Develop evidence-based actions informed by hydrology
- Work in more effective partnerships
- Enable change through strong leadership
- Manage surface water flood risk at the right scales

In order to achieve this vision, it would be necessary to act in the short, medium and long term. A Roadmap was also produced to outline what would be done in the first year, including launching the strategy and priority catchments, beginning a community campaign and releasing a data toolbox, identifying schemes and creating and progressing 10 strategic Surface Water Catchment Partnerships (which do not follow borough boundaries), and undertaking annual monitoring and continuing the rollout of catchment partnerships. It is intended that London is resilient enough to handle extreme rainfall events without major disruption.



2.4 Local Policy

There are multiple local policies which are relevant to flood risk in West London. In particular, the SFRA produced to determine the flood risk policies included in the LBs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames' development plans. These are described below, in addition to other local documents with the links provided to each LPA's local policies in *Table 1* where available.

2.4.1 West London SFRA

The West London Boroughs of Barnet, Brent, Ealing, Harrow, Hillingdon and Hounslow commissioned the production of a joint Level 1 SFRA in 2018 to provide evidence to guide planned development and proposed land use changes away from areas most at risk of flooding. The West London SFRA covers these six west London Boroughs, and this area overlaps with the Brent and Ealing parts of the OPDC area. It is periodically updated with the latest mapping available and is used by Barnet, Brent, Ealing, Harrow, Hillingdon and Hounslow Councils for strategic planning and by developers to better understand flood risk in the area.

The information provided in the West London SFRA has been used to inform this SFRA. The West London SFRA has been produced in a website format with interactive web maps which can be found [here](#).

2.4.2 Richmond upon Thames SFRA

Richmond upon Thames Council commissioned the production of a Level 1 SFRA in 2020, to deliver their planning and flood risk requirements. This has been used to inform this SFRA in terms of local flood risk within the LB of Richmond upon Thames. It is available to view online with interactive maps which can be found [here](#).

2.4.3 Additional Documents

The **Local Plan (LP)** is produced by each LPA and sets out planning policies to be used when determining planning applications. Local Plans should be prepared in line with national policy including section 20 of the Planning and Compulsory Purchase Act 2004 and the NPPF.

A **Local Flood Risk Management Strategy (LFRMS)** is required under the FWMA, for the LLFA to outline the flood risk in its area and provide strategic objectives which aim to achieve successful flood risk management during the period in which the strategy is active (6 year period). It should consider local issues and policy and reflect issues relating to all aspects of flood risk.

A **Surface Water Management Plan (SWMP)** is a non-statutory plan which outlines the preferred surface water management strategy in the LLFAs jurisdiction. It provides an understanding of the causes and effects of surface water flooding and deciding the most cost-effective way of managing surface water flood risk for the long term. It should therefore



establish a long-term action plan to manage surface water in an area, tailored to local needs and requirements.

Table 1: Relevant local policies

Area	Policy	Date published
Brent	Local Plan	February 2022
	Local Flood Risk Management Strategy	February 2025
	Surface Water Management Plan	October 2011
Ealing	Local Plan	November 2024
	Local Flood Risk Management Strategy	September 2016
	Surface Water Management Plan	December 2013
Harrow	Local Plan	February 2012
	Local Flood Risk Management Strategy	May 2016
	Surface Water Management Plan	October 2011
Hillingdon	Local Plan	November 2012
	Local Flood Risk Management Strategy	June 2024
	Surface Water Management Plan	October 2011
Hounslow	Local Plan	September 2015
	Local Flood Risk Management Strategy	August 2022
	Surface Water Management Plan	April 2021
Richmond upon Thames	Local Plan	March 2020
	Local Flood Risk Management Strategy	August 2023
	Surface Water Management Plan	December 2021
OPDC	Local Plan	June 2022



3 Sources of Flooding

3.1 RMA responsibilities

The Risk Management Authorities (RMAs) are organisations / bodies that are responsible for flood and coastal risk management and the ensuing actions that result from the flood risk. The Department for Environment, Food and Rural Affairs (DEFRA) carries the overall responsibility for forming policy on FCERM in England. The RMAs therefore have a responsibility to carry out and enact these policies within their realms of responsibility. DEFRA provides the funding required by the RMAs for flood risk management through grants. The main RMAs (relevant to this report) are as follows: the EA, LLFAs, LPAs, water and sewerage companies (i.e TWUL) and Highways Authorities. These RMAs must co-operate with each other and share information for the purposes of mitigating flood risk and aim to contribute towards sustainable development.

Table 2: Risk Management Authority Responsibilities

Risk Management Authority	Responsibility (within the context of this SFRA)
Department for Environment, Food & Rural Affairs (DEFRA)	Overall national responsibility for policy on FCERM in England. DEFRA also provides funding for flood risk management.
Environment Agency (EA)	The EA oversees and works with other organisations to manage risk of flooding and coastal erosion. The EA is mainly responsible for flood risk from Main Rivers, the sea and reservoirs and carries out works to alleviate any flood risk flooding from these sources. Providing flood risk advice to LPAs regarding development proposals in Flood Zones 2 and 3. • Managing fluvial and coastal flood risk by carrying out works. • Provides and operates flood warning systems. • Issues consent for works on or near main rivers, and works affecting watercourses, flood and sea defences and other structures protected by its byelaws • Facilitating works on or near main rivers, and works affecting watercourses, flood and sea defences and other structures protected by its byelaw by issuing consent. • Providing advice on development proposals. • Issues environmental permits for waste management facilities.
Lead Local Flood Authorities (LLFAs)	All boroughs within London deliver the LLFA role for their respective administrative areas. LLFAs have the lead operational role in managing flood risk from <u>surface water</u>, <u>ordinary watercourses</u> and <u>groundwater</u> sources. Their responsibilities include: • Developing, applying, maintaining and monitoring strategies for local flood risk management, including being involved in the preparation of SFRAs.



	• Preparing and maintaining a Preliminary Flood Risk Assessment, flood hazard maps, flood risk maps and FRMPs. • Designating structures and features that may have an effect on local flood or coastal erosion risk. • Investigating and reporting flood incidents (that reach a certain threshold). • Creating policies and guidelines to ensure that flood risk management work is effective. • Providing advice on major development proposals with surface water drainage implications • Regulation and enforcement of works on ordinary watercourses.
Local Planning Authorities (LPAs)	The LPA is a government body (often a Council department) that manages planning and development for a specific area. The LBs of Brent, Ealing, Harrow, Hounslow, Hillingdon and Richmond upon Thames, and the OPDC are all LPAs. Their key functions are as follows: • Determining planning applications. • Producing Local Plans. • Granting planning permission. • Planning enforcement. • Supporting neighbourhood planning.
Highway Authorities	Within London this includes Highways England, all LBs and Transport for London, responsible for providing and managing highway drainage. When necessary, they must work with the EA and the LLFA team when: • Working on highway drainage. • Working in roadside ditches. • Carrying out works on part of a watercourse. • Managing highway flooding.
Water and Sewerage Companies	Water and Sewerage companies hold the primary responsibility to manage any floods from burst sewers or water main pipes or system failures. Within West London, the main sewerage and water providers are Thames Water and Affinity Water and they hold powers under the Water Industry Act 1991 regarding connection of proposed developments to their networks.

3.2 Types of flooding

3.2.1 Fluvial flooding

Fluvial flooding occurs when water levels in rivers, streams or lakes rise above their banks, overflowing and flooding the surrounding areas, generally as a result of high levels of rainfall. Fluvial flooding can also be caused by excessive snow melt or by high tides and storm surges for rivers with tidal influences such as the lower reaches of the River Thames. Urbanisation exacerbates the effects of fluvial flooding due to the increased permeable surfaces and development within potential floodplains. The possibility of fluvial flooding is also broken down based on the EA's Flood Zone categories, as shown in *Table 3*. These Flood Zones are



based on the undefended flood scenario and do not account for the actual flood risk in an area that benefits from flood defence assets.

Table 3: Flood Zone definitions

Flood Zone	Definition
Flood Zone 1	Defined in the PPG as land with a 'Low Probability' of experiencing flooding from fluvial or tidal sources. Annual flooding probability (fluvial or tidal sources) of less than 1 in 1,000 years (<0.1% Annual Exceedance Probability (AEP)).
Flood Zone 2	Defined in the PPG as land with a 'Medium Probability' of experiencing flooding from fluvial or tidal sources. - Annual flooding probability (fluvial sources) of between 1 in 100 years to 1 in 1,000 years (1% to 0.1% AEP). - Annual flooding probability (tidal sources) of between 1 in 200 years to 1 in 1,000 years (0.5% to 0.1% AEP).
Flood Zone 3a	Defined in the PPG as land with a 'High Probability' of experiencing flooding from fluvial or tidal sources. - Annual flooding probability (fluvial sources) of greater than 1 in 100 years (>1% AEP). - Annual flooding probability (tidal sources) of greater than 1 in 200 years (>0.5% AEP).
Flood Zone 3b	'The Functional Floodplain' where land is deemed to be at the greatest risk of flooding from rivers or seas, and where water must flow or be stored during times of flood. This includes land that has an annual probability of flooding from rivers or seas of 1 in 30 years or greater ($\geq 3.3\%$ AEP), and land that is designed to flood (such as a flood attenuation scheme). <i>*Depending on the date of the latest update, and the river model layers available, some of the LPAs have used 1 in 20 or 1 in 50 year extents for their Flood Zone 3b. Further information on the extents used can be found in the West London SFRA and Richmond upon Thames SFRA.</i>

For more vulnerable uses, which the waste sites used for hazardous waste are, the central allowance must be used which in London is 17%CC for the 2080s epoch. The allowances are based on the percentiles from UKCP18 data. The main rivers each have a modelled output that also include certain climate change allowances.

The following main rivers are located within the West London catchment area: River Brent, River Colne, River Pinn, River Crane and River Thames. These also includes smaller tributaries from these main rivers. Detailed mapping has been undertaken for fluvial flood risk which can be found within the [West London SFRA](#) and [Richmond upon Thames SFRA](#).



3.2.2 Tidal flooding and residual flood risk

Tidal flooding occurs when water levels in rivers, estuary and coastal areas rise above adjacent land generally because of wave action, high tides and storm surges. Tidal flooding can also occur as a result of overtopping or breaching of flood defences, wave action or where tide-locking causes ponding of fluvial or surface water flows.

Due to the risk of tidal flooding from the River Thames, London has several defences that are called the Thames Tidal Defences, which are a collection of walls, embankments, flood gates, pumping stations and barriers designed to protect at risk properties against flooding from the Thames. The Thames Barrier is the most significant as it provides protection against high tides and storm surges originating from the North Sea, moving towards the Thames Estuary. These flood defences currently protect properties within the Thames floodplain up to a 1 in 1000-year event. Tidal breach modelling for the River Thames has been undertaken by the EA which provides an overview of the residual risk of tidal flooding. Within West London, only Hounslow is affected by tidal flooding.

Detailed mapping has been undertaken for tidal flood risk which can be found within the [West London SFRA](#) and [Richmond upon Thames SFRA](#).

3.2.3 Surface water flooding

Surface water flood risk (pluvial flooding) is induced by extreme rainfall events, which cause the local drainage infrastructure and infiltration capacity of an area to be overwhelmed or runoff adjacent land as sheet flow. Ordinary watercourse flooding is mainly associated with non-main river watercourses or ditches. This type of flooding is considered alongside surface water flooding as the EA also includes ordinary watercourses within their Risk of Surface Water flood mapping.

Surface water flooding is more likely to be severe and of longer duration in low lying areas, but local problems may result in all areas because of very heavy rain or infrastructure failure.

As part of the West London SFRA, the West London Boroughs of Barnet, Brent, Ealing, Harrow, Hillingdon and Hounslow adopted a definition of Flood Zone 3a that also includes surface water flood extents. This is defined as ‘Land within EA modelled surface water flood risk extents predicted for up to and including 1 in 100 year return period events’. This therefore may impose additional requirements for developments proposed within these areas.

Detailed mapping has been undertaken for surface water flood risk which can be found within the [West London SFRA](#) and [Richmond upon Thames SFRA](#). Further information on surface water flood risk, which was updated in January 2025 can be found under the ‘[Check your long term flood risk for an area in England](#)’ map. This also includes the impact of climate change on the risk of surface water flooding.



3.2.4 Groundwater flood risk

Groundwater flooding occurs when a rising water table within the underlying geology rises above ground, causing flooding at the surface or within basements. This can occur for prolonged periods of weeks or months, and often occurs after extensive and protracted heavy rainfall, resulting in an underlying aquifer rising above its regular depth. Aquifer vulnerability and ground composition significantly influence the potential groundwater flooding rate. Groundwater flood risk is increased at springs and low-lying areas where the water table is likely to be situated closer to the surface, and in areas where the underlying soil and bedrock are vulnerable to saturation.

Detailed mapping has been undertaken for groundwater flood risk which can be found within the [West London SFRA](#) and [Richmond upon Thames SFRA](#).

3.2.5 Sewer flood risk

Sewer flooding occurs when sewer infrastructure fails, or from an increased flow and volume of water entering a sewer system which exceeds its hydraulic capacity, causing the system to surcharge. If the outfalls of sewers are either blocked or submerged due to high water levels, this leads to the drainage system's capacity to be overloaded as water backs up into the system. This can result in water surcharging and overflowing from gullies and manholes, causing flooding in the local area. Furthermore, blockages caused by sediment or debris can further exacerbate the probability of sewer flooding.

TWUL is the statutory utility company that manages the drainage system and provides surface water, foul and combined sewer systems. The drainage systems are usually designed to accommodate the 1 in 30-year rainfall event. However, there are some older sewer systems within London that are not designed to accommodate the 1 in 30-year rainfall events. Furthermore, there are older sewer systems within the London area which use combined systems, including the eastern parts of the LBs of Ealing and Hounslow. TWUL's Drainage and Wastewater Management Plan Capacity Framework mapping indicates that there are widespread areas across West London where sewer surcharge would occur in a 1 in 2-year storm from 2020 and 2025 onwards.

Detailed mapping has been undertaken for sewer flood risk which can be found within the [West London SFRA](#) and [Richmond upon Thames SFRA](#).

3.2.6 Artificial sources of flood risk

Artificial sources of flooding include reservoirs, canals and lakes. Reservoir or canal flooding may occur as a result of the water body being overwhelmed or as a result of dam or bank failure.

The Grand Union Canal is the prevalent artificial waterbody within West London, with the Brent Reservoir (Welsh Harp) featured within the LB of Ealing, The Duke of Northumberland



River (a man-made artificial waterway) situated within the LBs of Hillingdon and Harrow and the Ruislip Lido within the LB of Hillingdon.

Detailed mapping has been undertaken for artificial sources of flood risk which can be found within the [West London SFRA](#) and [Richmond upon Thames SFRA](#).



4 Flood Risk Assessment Guidance

4.1 Overview

Applicants and LPAs must consider flood risk to and arising from proposed developments, including waste sites, within all planning proposals. For guidance on where a site-specific FRA is required within West London, the [West London SFRA](#) (for the LBs of Brent, Ealing, Harrow, Hillingdon and Hounslow) the [Richmond upon Thames SFRA](#), or OPDC should be consulted, dependent upon the site location. Applicants must demonstrate that the development will not increase flood risk elsewhere or be at risk of flooding itself, and that developments are appropriately resilient to potential climate change impacts. This section provides guidance on the planning application and development requirements for the LPA and applicants, should changes be made to the existing sites, which would require planning permission. Should there be any windfall sites, this information would also apply, in addition to the application of the Sequential and Exception Tests.

4.2 The Sequential and Exception Tests

The [Flood Risk Vulnerability Classification in Annex 3](#) defines waste sites as one of the following vulnerability classifications:

- **Less Vulnerable** - Waste treatment (except landfill and hazardous waste facilities).
- **More Vulnerable** - Landfill and sites used for waste management facilities for hazardous waste.

The NPPF requires that a sequential, risk-based approach to the location of development is applied to avoid the risk of flooding to people and property where possible. The Sequential Test requires that proposed development is avoided as far as possible in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding. Application of the Sequential Test is illustrated in [Diagram 2 of the PPG](#).

The NPPF recognises that it may not always be possible for developments to be situated within areas that have a lower flood risk, such as in cases where developments may be proposed within established communities that require continued development to grow. The NPPF provides the Exception Test for these types of proposals, which is a means of demonstrating and ensuring that there will be satisfactory management of flood risk to people and property whilst permitting necessary development in situations where there are no suitable sites at a lower flood risk available. The [Flood risk vulnerability and Flood Zone 'incompatibility' table](#) from the PPG, highlights where, according to the vulnerability classification of the development, the Exception Test is required / not required and where development should not be permitted. Application of the Exception Test is illustrated in Diagram 3 of the [PPG](#).



As there are no new sites proposed as part of the WLWP, application of the Sequential and Exception Tests is not currently applicable to the existing safeguarded sites, however, should any development come forward on windfall sites, the Sequential and Exception Tests should be applied as per the guidance provided above. The vulnerability of the site may also need to be taken into account should there be any further development proposed within the existing sites. This information is provided in *Appendix A – Sites*, in addition to a high-level analysis of whether there are any constraints on expansion potential. This should be used in conjunction with *Appendix B – Site Specific Flood Risk Analysis*, to determine whether further development would be appropriate in accordance with the flood risk identified at the site.

4.3 Planning Application and Development Requirements

According to [Section 57 of the Town and Country Planning Act 1990](#), planning permission is required for all work falling under the statutory definition of ‘development’ defined in [Section 55 of the Town and Country Planning Act 1990](#), unless it meets permitted development criteria. Major development is defined by the [Town and Country Planning Order 2015](#), for which the definition can be found below. Waste collection and processing facilities are defined as major development. Despite there being no additional sites proposed within this SFRA, planning permission would still be required should any development take place within the existing sites, and windfall sites may come forward which would need to follow the requirements set out. Proposals should also be in line with Policy 4 of the WLWP ‘Ensuring High Quality and Resilient Waste Facilities’.

Major Developments:

- For residential developments, a site with 10+ dwellings or an area over 0.5 hectares if the number of dwellings is not known.
- For non-residential developments, a site area over 1 hectare or a total building floorspace of at least 1,000m².
- A site involving mining or processing mineral materials.
- Waste or sewage collection or processing facilities.

Information on when a FRA is required as part of a planning application, and how to complete one can be found within the [EA’s Guidance](#). Further information is also provided on how to access the right advice and information for preparing the FRA. The following advice is provided dependent upon the proposed development and its location:

- [EA’s standing advice for vulnerable developments](#), for a FRA for a development (including change of use) in Flood Zone 2 classed as: ‘more vulnerable’, ‘less vulnerable’ or ‘water compatible’, and for change of use development in Flood Zone 3 where the vulnerability classification will be ‘water compatible’ or remain unchanged as ‘less vulnerable’
- [EA’s advice for all other development types](#) requiring a FRA in Flood Zones 1, 2, 3, or 3b



- If a site is in Flood Zone 1, but the EA's [Flood Map for Planning](#) or the LPAs SFRA shows that it will be at increased risk of flooding from rivers or the seas during the development lifetime, a FRA should be done, and the site should be treated as if it were in Flood Zone 2 when deciding on the required advice needed

It should be noted that Flood Zone 3b (The Functional Floodplain) is defined by LPAs. Flood Zone 3b for the LBs of Brent, Ealing, Harrow, Hillingdon, Hounslow, and Richmond upon Thames is defined within the West London and Richmond upon Thames SFRAs. In addition, the LBs of Brent, Ealing, Harrow, Hillingdon and Hounslow have a Flood Zone 3a extent for surface water. This therefore must be considered should there be future windfall proposals or changes to existing sites.

Local requirements that must be addressed as part of the SuDS Strategy and flood risk submission documents for sites located within the LBs of Brent, Ealing, Harrow, Hillingdon and Hounslow can be found in Tables [4-1](#) (Major Developments), [4-2](#) (Minor Developments), [4-3](#) (Change of Use Developments and changes to Prior Approvals), and [4-4](#) (Individual Sites) of the [West London SFRA](#). For sites located in the LB of Richmond upon Thames, local requirements can be found in Table 6-1 of their [SFRA Report](#). The guidance is applicable for Major, Minor, and Changes Under Prior Approved Notifications developments. For sites, in OPDC area, please refer to OPDC's Local Plan and relevant supporting documents. At a site level, developers should also consult the EA, sewerage undertakers, highways authorities and any other relevant bodies to supply information for a FRA for the site.

4.4 Climate Change Guidance

In 2016, the EA published its [FRAs: Climate Change Allowances guidance](#). This document sets out how climate change allowances should be applied in both SFRAs and site-specific FRAs, ensuring that development decisions account for future climate impacts.

Since 2019, the EA has progressively updated these allowances to reflect the UK Climate Projections 2018 (UKCP18). The most recent revisions, as of December 2025, were the August 2025 updates. This includes changes to the Global Warming Levels methodology for the UKCP18 regional and probabilistic elements. The update also included revisions to the guidance pages. Peak rainfall intensity allowances are now defined at the Management Catchment level (sub-catchments within large River Basin Districts) providing more regionally specific guidance. Under the latest approach, the central allowance should be applied to developments with lifetimes extending between 2100 and 2125, supporting long-term resilience planning.

These updated peak rainfall allowances will need to be incorporated into any future planning applications to ensure that planning decisions remain aligned with the most up-to-date climate science and national flood risk management frameworks. Further information on the peak rainfall allowances required to be used can be found within the [map](#) produced alongside the guidance.



For peak river flow allowances, another [map](#) is provided to show the allowances required to be used. Appropriate climate change allowances must be applied in line with the guidance, and applicants must consider the flood risk vulnerability classification of their proposed development and the flood zone in which it falls.



5 Conclusions and Recommendations

5.1 Conclusions

This SFRA assesses the flood risk present in West London from various sources to inform production of the updated WLWP. This flood risk is analysed at a strategic level based on the information and data provided in the West London and Richmond upon Thames SFRAs. The flood risk across West London is variable and is dependent on a number of sources which include fluvial, tidal, surface water, sewer, groundwater, and artificial sources of flooding. Climate change is a key factor increasing the risk of flooding across the UK and should also be considered in terms of its impact on the various flood risk sources within West London.

There are no additional sites proposed as part of the updated WLWP, and no changes proposed to the existing sites. Despite this, there may be a possibility of expansion of existing facilities, a change in the waste type managed, or potential windfall sites. The SFRA therefore provides guidance on how flood risk must be considered in this context. A summary of the flood risk in West London is outlined, with additional guidance should applications for additional waste related development come forward during the updated Plan period. Further analysis has also been undertaken on a site level on each existing site proposed to be safeguarded, to inform applicants of the current flood risk to the sites should there be any future amendments proposed. A summary of the key information identified for each site can be found in *Appendix A – Sites*, with further detail including mapping provided in *Appendix B – Site Specific Flood Risk Analysis*.

This SFRA has been developed using the most recent policy, legislation and information available at the time of writing (December 2025). This SFRA is however also intended to be used to assist various parties in considering flood risk should there be a need to make planning decisions if future development is proposed. It is therefore essential that the data contained within the SFRA is as up to date as possible to ensure that decisions are made on the best information available. Events that may trigger a possible review could include the following: changes to the NPPF and associated PPG which forms the basis of the SFRA, updates to any of the overarching legislation, or updates to the available flood risk information used to develop the SFRA. This may also include the West London and Richmond upon Thames SFRAs, for which some of the data available has been used to inform this report.

5.2 Recommendations

The West London LPAs should consider all possible sources of flooding and the flood vulnerability categories of the waste sites in accordance with the Sequential and Exception Test approach recommended in the NPPF. There is currently no further development of waste sites proposed as part of the updated WLWP. Should any further development be required,



site-specific FRAs should be undertaken at the planning application stage where appropriate in accordance with the proposed vulnerability and level of risk presented. This SFRA should be used to guide any future development of waste sites across West London through implementation of the processes outlined within the SFRA and use of the associated mapping.



Appendix A – Sites



Facility ID	Location	Operator	Facility Type	Use Vulnerability	Flood Zones	Development constraints
London Borough of Brent: 10 Sites						
B04	Neasden Sidings, Drury Way, Wembley	Quattro Limited obo WRG (Midlands) Limited	Transfer	Less Vulnerable	No	None
B05	Atlas Road Wembley	O'Hara Bros. Aggregates Limited	Non-haz Treatment	Less Vulnerable	Flood Zone 3a (Surface Water)	Flood Zones 2, 3, and 3b are located to the west of the site which limits expansion here. Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site. A Flood Risk Activity Permit may be required.
B06	Unit 4, Second Way, Wembley	HAWK Rubbish Clearance Limited	Non-haz Treatment	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
B07	SRC Aggregates Wembley Depot	Sewells Reservoir Construction Limited	Transfer	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.



Facility ID	Location	Operator	Facility Type	Use Vulnerability	Flood Zones	Development constraints
B10	Unit 28, Fourth Way WTF	Brent Oil Contractors Limited	Transfer	More Vulnerable	No	None
B12	Unit 2, Hannah Close	LondonEnergy Ltd	Treatment	Less Vulnerable	Flood Zone 2 (Fluvial), Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
B13	Alperton Lane Waste Transfer Station	Sortera	Treatment	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
B14	Brent Transfer Station, Alperton Lane	Veolia ES (UK) Ltd	Transfer	Less Vulnerable	Flood Zones 2 and 3 (Fluvial), Flood Zone 3a (Surface Water)	Flood Zones 2, 3, and 3b are located on the edge of the site to the south which limits expansion here. Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site. A Flood Risk Activity Permit may be required.
B15	Wembley Transfer Station & Recycling Facility	Biffa Waste	Transfer	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
B16	Hannah Close, off Great Central Way, Neasden,	L & B Haulage & Engineering Contractors Ltd	Transfer	Less Vulnerable	Flood Zone 3a (Surface Water)	Flood Zones 2, 3, and 3b are located to the west of the site



Facility ID	Location	Operator	Facility Type	Use Vulnerability	Flood Zones	Development constraints
						which limits expansion here. Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site. A Flood Risk Activity Permit may be required.
London Borough of Brent/OPDC: 3 Sites						
B01	Twyford WTS Abbey Road	West London Waste Authority	WTS	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
B02	100 Twyford Abbey Road	Bridgemarts	WTS	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
B08	Willesden F Sidings Rail Freight Terminal	Cappagh Public Works Limited	Transfer	Less Vulnerable	Flood Zones 2 and 3 (Fluvial)	Flood Zones 2 and 3 are located on the western edge of the site which limits expansion here. Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
London Borough of Ealing: 14 Sites						



Facility ID	Location	Operator	Facility Type	Use Vulnerability	Flood Zones	Development constraints
E01	Greenford Depot Reuse & Recycling Centre	Ealing Council	Transfer	Less Vulnerable	Flood Zone 3a (Surface Water)	Flood Zones 2, 3, and 3b are located to the south-east of the site which limits expansion here. Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site. A Flood Risk Activity Permit may be required.
E02	Acton Waste & Recycling Centre	Ealing Council	Transfer	Less Vulnerable	No	None
E05	WTS Station Approach Greenford	360 Waste Limited	Non-haz Treatment	Less Vulnerable	No	None
E06	British Rail Goods Yard, Greenford	Link2london Ltd	Transfer	Less Vulnerable	No	None
E07	Horn Lane Waste Transfer Station	Quattro (UK) Limited	Transfer	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
E08	163-165 Brent Rd, International Trading Estate	Link2london Ltd (formerly J Simpson Waste Management)	Transfer	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.



Facility ID	Location	Operator	Facility Type	Use Vulnerability	Flood Zones	Development constraints
E09	Stone Terminal (aka Western Regions Good Yard), 205 Horn Lane	Holcim UK Ltd (formerly Aggregate Industries UK Limited)	Non-haz Treatment	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
E12	London Auto Parts Alpertown Lane	London Auto Parts Limited	MRS	More Vulnerable	Flood Zone 3a (Surface Water)	Flood Zones 2, 3 and 3b are located on the eastern edge of the site which limits expansion here. The Exception Test may be required for the site should further development be proposed. A Flood Risk Activity Permit may be required.
E14	Station Approach, Oldfield Lane North, Greenford (Haulage World WTS)	Link2london Ltd	Treatment	Less Vulnerable	No	None
E15	Greenford Depot (Waste Transfer Station)	Ealing Council	Treatment	Less Vulnerable	Flood Zone 3a (Surface Water)	Flood Zones 2, 3 and 3b are located on the eastern edge of the site which limits expansion here. Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site. A Flood Risk Activity Permit may be required.



Facility ID	Location	Operator	Facility Type	Use Vulnerability	Flood Zones	Development constraints
E16	Oldfield Lane North, Greenford Ocean Estate Distribution Centre	GXO Logistics FST Limited	Transfer	Less Vulnerable	No	None
E18	Colville Rd	Elis UK Ltd	Transfer	More Vulnerable	No	None
E19	Unit 42a Sheraton Business Park,	Autofleet Salvage Limited	MRS	More Vulnerable	No	None
E20	Land off Collett Way	Wards of London Properties Ltd	Non-haz Treatment	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
London Borough of Ealing/OPDC: 2 Sites						
E11	Willesden Euro Terminal	Costain Limited (Formerly Skanska Construction UK Limited)	Transfer	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
E13	First Mile Recycling Facility	First Mile Limited	Treatment	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
London Borough of Harrow: 2 Sites						
HA01	Forward Drive CA Site	Harrow Council	WTS	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the



Facility ID	Location	Operator	Facility Type	Use Vulnerability	Flood Zones	Development constraints
						Exception Test may be required for the site.
HA02	151 Pinner View	Harrow Breakers	MRS	More Vulnerable	Flood Zone 3a (Surface Water)	The Exception Test may be required for the site should further development be proposed.
London Borough of Hillingdon: 22 Sites						
HI01	New Years Green Lane CA Site & WTS	Hillingdon Council	WTS	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
HI02	Airside Waste Sweepings Treatment Facility	Heathrow Airport Ltd	Treatment	Less Vulnerable	No	None
HI03	New Years Green Lane	B F A Recycling Limited	MRS	Less Vulnerable	No	None
HI04	WTS, Civic Way, Ruislip	B & K Environmental Services Limited	WTS	Less Vulnerable	Flood Zone 2 (Fluvial), Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
HI06	Land off Holloway Lane Harmondsworth	Foley Haulage Limited	Treatment	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.



Facility ID	Location	Operator	Facility Type	Use Vulnerability	Flood Zones	Development constraints
HI07	GK Depot, Trout Road	Recycling With Skips Limited	Treatment	Less Vulnerable	No	None
HI08	Old Stockley Road, West Drayton	Hanson Quarry Products Europe Limited (formerly West Drayton Aggregates)	Treatment	Less Vulnerable	No	None
HI09	Holloway Lane Materials Recycling Facility	Powerday Plc	Treatment	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
HI13	Skip Lane, Harvill Road	Sortera Limited (formerly Uxbridge Skip & Recycling Ltd)	Treatment	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
HI14	WTS Off Rigby Lane	Talking Rubbish Waste Solutions Limited	Treatment	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
HI15	Skip Lane, Harvill Road,	Thames Materials Limited (formerly Pioneer Concrete)	Treatment	Less Vulnerable	No	A Flood Risk Activity Permit may be required.
HI16	Unit 1 Wallingford Road Recycling Facility	Uxbridge Recycling Limited (formerly A&A Recycling Ltd)	Treatment	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.



Facility ID	Location	Operator	Facility Type	Use Vulnerability	Flood Zones	Development constraints
HI17	Crows Nest Farm	Country Compost Limited	Compost	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
HI18	High View Farm	West London Composting Limited	Compost	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
HI19	Hillingdon Clinical Waste Incinerator	Medisort Ltd	Incin	Less Vulnerable	No	None
HI20	Cranford Lane WTS, Heathrow	Heathrow Airport Limited	WTS	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
HI21	Waybeards Farm, Hill End Road, Harefield	F J Heppelthwaite Solutions Limited (formerly Hep Oils)	WTS	Less Vulnerable	No	None
HI24	Heathrow Depot	FM Conway	Treatment	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site. A Flood Risk Activity Permit may be required.
HI25	Central Depot Harlington Road	Hillingdon Council	WTS	Less Vulnerable	No	None



Facility ID	Location	Operator	Facility Type	Use Vulnerability	Flood Zones	Development constraints
HI27	Unit 1 & 2 Pump Lane Industrial Estate	Personnel Hygiene Services Limited	WTS	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
HI28	Hayes Transfer Station Rigby Lane	Suez Recycling & Recovery UK Ltd	WTS	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
HI29	Victoria Road WTS	Suez Recycling & Recovery UK Ltd	WTS/RDF	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site. A Flood Risk Activity Permit may be required.
London Borough of Hounslow: 10 Sites						
HO01	Space Waye C A Site	Hounslow Council	WTS	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
HO2	Southall Lane Western International Market	Quattro (UK) Limited	Treatment	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.



Facility ID	Location	Operator	Facility Type	Use Vulnerability	Flood Zones	Development constraints
HO3	St Albans Farm Recycling Facility	Ron Smith (Recycling) Limited	MRS	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site.
HO04	Norris House	Globalparts- (UK) Limited	MRS	More Vulnerable	No	None
HO05	Mayer Parry, Brentford	European Metal Recycling Limited	MRS	Less Vulnerable	Flood Zone 3a (Surface Water)	Flood Zones 2, 3 and 3b are located along the northern edge of the site which limits expansion here. Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site. A Flood Risk Activity Permit may be required.
HO07	Brentford Aggregate Materials Recycling Facility	Day Group Limited	Treatment	Less Vulnerable	Flood Zone 3a (Surface Water)	Flood Zones 2, 3 and 3b are located along part of the northern edge of the site which limits expansion here. Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site. A Flood Risk Activity Permit may be required.
HO09	ATS Building, Amberley Way	Rubber Recycling Solutions Limited	Treatment	Less Vulnerable	No	None



Facility ID	Location	Operator	Facility Type	Use Vulnerability	Flood Zones	Development constraints
HO11	Southall Lane Depot	Lampton Recycle 360 Limited	Treatment	Less Vulnerable	No	None
HO13	Isleworth Site, Fleming Way Trading Estate	Citron Hygiene (UK) Limited	WTS	Less Vulnerable	No	None
HO14	Transport Avenue WTS	Suez Recycling & Recovery UK Ltd	WTS/RDF	Less Vulnerable	Flood Zone 3a (Surface Water)	Should the vulnerability change to 'More Vulnerable', the Exception Test may be required for the site. A Flood Risk Activity Permit may be required.
London Borough of Richmond upon Thames: 4 Sites						
R01	Townmead C A Site	Richmond Upon Thames Council	WTS	Less Vulnerable	Flood Zone 3 (Fluvial)	The Exception Test may be required for the site should further development be proposed.
R02	The Royal Botanic Gardens, Kew	The Royal Botanic Gardens, Kew	Compost	Less Vulnerable	No	None
R03	Central Depot, Langhorn Drive	Richmond Upon Thames Council	WTS	Less Vulnerable	No	A Flood Risk Activity Permit may be required.
R04	Arlington	Sharpes Oil	Treatment	More Vulnerable	No	None



Appendix B – Site Specific Flood Risk Analysis

