



Emerging Updated West London Waste Plan Integrated Impact Assessment Scoping Report

West London Waste Planning Authorities

Final report

Prepared by LUC

June 2025

Version	Status	Prepared	Checked	Approved	Date
1	Draft	R Finnigan H Naylor L Haddad K Tandavanitj	K Nicholls T Livingston A Potter	T Livingston	23.05.2025
2	Final	H Naylor L Haddad M Sparks	T Livingston	T Livingston	23.06.2025



Land Use Consultants Limited

Registered in England. Registered number 2549296. Registered office: 250 Waterloo Road, London SE1 8RD. Printed on 100% recycled paper

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Chapter 1

Introduction

1.1 LUC was commissioned in October 2023 to undertake an Integrated Impact Assessment (IIA), comprising Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA), and Habitats Regulations Assessment (HRA) for the updated West London Waste Plan (WLWP).

1.2 Production of an updated WLWP is a collaborative venture between the following local planning authorities:

- London Borough of Brent;
- London Borough of Ealing;
- London Borough of Harrow;
- London Borough of Hillingdon;
- London Borough of Hounslow;
- London Borough of Richmond upon Thames; and
- the Old Oak and Park Royal Development Corporation (OPDC).

1.3 The purpose of this Scoping Report is to establish an appropriate scope and level of detail for the IIA of the WLWP and to document this as a basis for consultation with the statutory consultees.

Geographical context for the West London Waste Plan

1.4 The WLWP area is formed by the six westerly London Boroughs: Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames. The WLWP also includes the area covered by the Old Oak and Park Royal Development Corporation (OPDC). The OPDC is a Mayoral Development Corporation (MDC), established by the Mayor of London to secure the regeneration of the Old Oak and Park Royal Opportunity area, spanning land in three London boroughs – Ealing, Brent, and Hammersmith and Fulham.

1.5 The administrative geography of London is overseen at a regional level by the Greater London Authority (GLA). There are 33 administrative areas within

London: 12 inner boroughs, 20 outer boroughs, and the City of London. The WLWP area sits within outer London. The plan area is bordered within London:

- To the east by the London Borough of Barnet and the London Borough of Camden; and
- To the southeast by the London Borough of Westminster, the London Borough of Kensington and Chelsea, the London Borough of Hammersmith & Fulham, the London Borough of Kingston upon Thames, and the London Borough of Wandsworth.

1.6 The Plan area shares borders with planning authority areas outside London as follows:

- To the north within the county of Hertfordshire, are the districts of Three Rivers and Hertsmere.
- To the west are the unitary authorities of Buckinghamshire, Slough, and Windsor and Maidenhead, as well as the Surrey county districts of Spelthorne and Elmbridge.

1.7 The population of the WLWP area has grown from 1.6m in the 2011 Census to over 1.75m in the 2021 Census **[See reference 1]**. The London Plan predicts that the population of London as a whole is projected to increase by 70,000 every year, reaching 10.8 million in 2041, and growth in West London will be supported by the development of High Speed 2 (HS2), Crossrail 2 and within the OPDC **[See reference 2]**.

1.8 West London is a diverse area, including urban centres, industrial hubs, transport corridors, and extensive green spaces. Waste management development in this area is principally affected by:

- Strategic industrial clusters providing key locations for waste management facilities;
- Major regeneration areas have been identified for significant new development of homes and employment space, which could increase waste production and impact waste sites but also create opportunities to plan for innovative and sustainable waste solutions;
- Development constraints such as:
 - Residential areas and other conflicting land uses;
 - Green Belt;
 - Metropolitan Open Land (MOL);

- Heritage and conservation designations;
- Ecological designations;
- Flood risk zones;
- Air Quality Management Areas (AQMAs); and
- Transport infrastructure, including key road and rail freight networks and interchanges, that affect waste logistics.

Borough by Borough Summary Profile (alphabetical order)

1.9 The London Borough of Brent (LBB) is located in the north east of the plan area, with Harrow to the north and Ealing to the south. There are currently 15 permitted waste management facilities operational within the Borough.

- Key Strategic Industrial Locations (SIL) for waste management development include Wembley and Alperton. East Lane SIL and other industrial areas may also offer opportunities for waste development in the future.
- The main growth and regeneration areas including Wembley, Alperton and the Neasden Stations Growth Area will grow through high-density development, requiring integrated waste solutions to facilitate management of separate waste streams.
- Major transport routes are provided by the North Circular (A406), A5, and M1, but, like all of the plan area, congestion is an issue across the Borough.
- Designations such as the borough-wide AQMA, Air Quality Focus Areas (AQFAs), the Welsh Harp reservoir SSSI and flood risk along the River Brent and Wealdstone Brook may limit further waste development.

1.10 The London Borough of Ealing (LBE) is located in the central section of the plan area with Harrow and Brent to the north, Hillingdon to the west, and Hounslow and Richmond to the south. There are currently 19 permitted waste management facilities operational within the Borough.

- The main locations for waste transfer and recycling facilities are the Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) in Greenford, Perivale, Northolt, and Southall.
- Regeneration pressures in the Southall Opportunity Area is expected to increase waste production and require integration with the circular economy.

- The main transport routes are the A40, A406 and Uxbridge Road. There is potential for the development of rail-based freight locations for waste transport.
- The designated borough-wide AQMA, Green Belt and potential flood risk along the River Brent, and in Southall and Acton may limit further waste development.

1.11 The London Borough of Harrow is located to the north of the plan area with Brent, Ealing and Hillingdon to the south. There are two permitted waste management facilities operational within the Borough.

- There is relatively limited industrial land within the Borough. The main areas are Wealdstone (SIL and LSIS) and Honeypot Lane.
- Wealdstone and Harrow Town Centre growth areas are expected to increase waste production, but space for new stand alone waste management facilities is limited.
- Compared to the other Boroughs in the plan area, a lack of major highway or rail freight connections, make waste transport more reliant on local road networks.
- The borough-wide AQMA and Green Belt land may limit further waste development.

1.12 London Borough of Hillingdon (LBHi) sits to the west of the plan area with Harrow and Ealing to the east, and Hounslow to the south. There are 34 permitted waste management facilities operational within the Borough.

- The key industrial and transport hubs are Heathrow Airport, Stockley Park, and Hayes & West Drayton Corridor which produce significant quantities of commercial and industrial (C&I) waste.
- There are existing waste infrastructure locations at West Drayton Waste Transfer Station, South Hillingdon Recycling Centre and Harmondsworth Quarry/Sipson (historic mineral workings).
- Key transport routes include the M4, A40, M25 and West Drayton Rail Freight Terminal. There is potential for waste transport by rail and already one rail transfer station at Victoria Road.
- The designated AQMA covering three quarters of the borough, Green Belt, and potential flood risk from the River Colne and Grand Union Canal may limit further waste development.

1.13 The London Borough of Hounslow (LBHo) sits to the south west of the plan area, with Richmond to the south east and Hillingdon and Ealing to the north. There are currently 12 permitted waste management facilities operational within the Borough.

- The key Strategic Industrial Locations for waste management facilities are the Great West Corridor, North Feltham Trading Estate, and Brentford.
- Regeneration opportunities in the Great West Corridor Opportunity Area and the Hounslow part of the Heathrow Opportunity Area (aka the 'West of the Borough' area, which includes Feltham Town Centre) are expected to increase waste management requirements.
- Strategic road connections include the M4 and rail freight at Brentford sidings and rail transfer station at Transport Avenue.
- The designated borough-wide AQMA, Green Belt, and potential flood risk from the River Thames and its tributaries, as well as surface water and groundwater influenced flooding may limit further waste development.

1.14 The London Borough of Richmond upon Thames (LBR) is located in the very south of the plan area, with Hounslow to the north. There are 3 permitted waste management facilities operational within the Borough.

- Smallest industrial base in West London - Limited industrial land, with waste facilities concentrated at Townmead Road Household Waste and Twickenham Depot.
- Regeneration and waste growth - Mortlake (Stag Brewery redevelopment), Twickenham and Richmond town centre redevelopment are expected to increase waste generation.
- Other key development constraints include:
 - Borough-wide AQMA,
 - Richmond Park (NNR, SSSI and SAC, Historic Park and Garden), Bushy Park and Home Park (SSSI, Historic Park and Garden), Kew Gardens (UNESCO World Heritage Site),
 - Green Belt, Metropolitan Open Land (MOL) and Other Open Land of Townscape Importance (OOLTI), and
 - Flood risk from the River Thames and its tributaries, as well as surface water and groundwater influenced flooding.
- Transport considerations - limited road capacity for HGV waste transport.

1.15 The Old Oak and Park Royal Development Corporation (OPDC) is a Mayoral Development Corporation (MDC), established by the Mayor of London to secure the regeneration of the Old Oak Opportunity area, spanning land in three London boroughs – Ealing, Brent (within the WLWP area), and Hammersmith & Fulham.

- The OPDC contains London’s largest SIL which accommodates over 2,000 businesses. Key sectors include transport and logistics, food manufacturing and creative industries.
- The OPDC area has the potential to deliver up to 19,850 new homes and space for 36,350 up to 2038 with more planned in later stages. It includes one of the UK’s largest regeneration projects at Old Oak, which includes planned construction of infrastructure and up to 9,000 new homes and thousands of new jobs, with opportunities to use advanced waste solutions and apply circular economy principles.
- Existing waste management sites are located in SIL or outside of this, within proposed major, mixed-use neighbourhoods.
- Key transport routes include the A40 and A406. There are multiple existing and future planned rail connections which provide potential for non-road based waste transport.
- The designated AQMA covering the whole OPDC, proximity to Wormwood Scrubs Metropolitan Open Land (MOL) and potential flood risk from the Grand Union Canal, alongside surface water flooding, may limit development. Development may also be impacted temporarily by HS2 construction.

1.16 Due to the location of the plan area, the WLWP area benefits from strategic transport links including access to the M1, M4 and M25 motorways, and the A3, A4, A30, A40 and A406.

West London Waste Plan

1.17 The current version of the WLWP was adopted in 2015 **[See reference 3]** and set out to meet the requirements of the national policy and the London Plan (2011), to plan effectively for waste across the WLWP area and London's wider needs as set out in the apportionments in the London Plan, as amended by the Further Alterations to the London Plan (2015). There have been two iterations of the London Plan since adoption of the West London Waste Plan: the London Plan (2016), and the current adopted London Plan (2021).

1.18 The current WLWP was prepared under the original National Planning Policy Framework (NPPF 2012), the National Waste Plan for England (2013), and the National Planning Policy for Waste (NPPW, 2014). To meet the London Plan apportionments for municipal solid waste (MSW) and commercial and industrial (C&I) waste, the current WLWP allocated seven existing waste sites already managing MSW and C&I waste identified as capable of redevelopment to increase their waste recovery capacity, and an additional suitable site not currently developed for waste management use.

1.19 No allocations were made in the current WLWP for construction and demolition (C&D) waste facilities or for hazardous waste management. The plan was designed to be flexible to allow for developments and improvements in waste management technologies and the changing habits of consumers and waste producers.

1.20 The WLWP is now being updated, and once adopted, the updated WLWP will form the principal part of the development plan against which planning applications for waste management facilities across the plan area will be determined. The emerging evidence base being prepared for the updated WLWP does not indicate that additional capacity is needed, which would justify the allocation of additional land for the development of new waste facilities in the plan.

Sustainability Appraisal and Strategic Environmental Assessment

1.21 Under the amended Planning and Compulsory Purchase Act 2004 [See reference 4], SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC) as transposed into law in England by the SEA Regulations [See reference 5], which currently remain in force despite the UK exiting the European Union in January 2020. Therefore, it is a legal requirement for the WLWP to be subject to SA and SEA throughout its preparation.

1.22 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the national Planning Practice Guidance [See reference 6]), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA process – this is the process that is being undertaken for the

WLWP, as part of the wider IIA. From here on, the term 'SA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Regulations'.

1.23 The SA process comprises a number of stages, which are being undertaken as part of the IIA, with scoping being Stage A as shown below:

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.

Stage B: Developing and refining options and assessing effects.

Stage C: Preparing the SA (or IIA) Report.

Stage D: Consulting on the WLWP and the SA (or IIA) Report.

Stage E: Monitoring the significant effects of implementing the WLWP.

Health Impact Assessment

1.24 Although not a statutory requirement, Health Impact Assessment (HIA) aims to ensure that health-related issues are integrated into the plan-making process. The HIA of the WLWP will be carried out as part of the IIA by ensuring that the IIA objectives against which the Plan is appraised address relevant health issues. Recommendations will be made in relation to how the health-related impacts of the Plan can be optimised as the options are developed into detailed policies.

Equalities Impact Assessment

1.25 The requirement to undertake formal Equalities Impact Assessment (EqIA) of development plans was introduced in the Equality Act 2010 but was abolished in 2012. Despite this, authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions.

1.26 In fulfilling this duty, many authorities still find it useful to produce a written record of how equality issues have been considered. In this IIA report, equalities issues are considered within the appraisal framework.

Habitats Regulations Assessment

1.27 The requirement to undertake Habitats Regulations Assessment (HRA) of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in July 2007 and updated in 2010 and again in 2012 and 2017 [See reference 7]. The Regulations translate Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) and 79/409/EEC (Birds Directive) into UK law and currently remain a legal requirement despite the UK exiting the European Union.

1.28 The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of any European Sites present within or in proximity to a plan area, and to ascertain whether it would adversely affect the integrity of that site.

1.29 The HRA will be undertaken separately but the findings will be taken into account in the IIA where relevant.

Approach to scoping

1.30 The main tasks associated with the scoping stage of the IIA (stage A) are as follows:

- **Stage A1:** Setting out the policy context for the IIA of the Plan, i.e., key policies and strategies that influence what the Plan and the IIA need to consider.
- **Stage A2:** Setting out the baseline for the IIA of the Plan, i.e., the current and environmental, social (including health and equalities), and economic conditions in the West London Waste Plan area and their likely evolution in the absence of an updated Plan.
- **Stage A3:** Drawing on A1 and A2, identify the sustainability problems and/or opportunities ('issues') that the Plan and the IIA should address.
- **Stage A4:** Drawing on A1, A2 and A3, develop a framework of IIA objectives and assessment criteria against which to appraise the constituent parts of the Plan in isolation and in combination.
- **Stage A5:** Consulting on the intended scope and level of detail of the IIA.

1.31 This Scoping Report sets out the intended scope and level of detail of the IIA of the emerging WLWP, for consultation with the relevant environmental

authorities. It fulfils the requirements set out above and provides the foundations for later appraisal of the likely effects of constituent parts of the WLWP, as plan-making progresses. In accordance with the Government's Planning Practice Guidance on SEA/SA, the Scoping Report is proportionate and relevant to the WLWP, focussing on what is needed to assess likely significant effects [See reference 8]. It also takes account of the National Planning Policy Framework (NPPF) and the emphasis it places on achieving sustainable development.

1.32 This IIA Scoping Report follows and takes account of key legislation, policy and guidance including:

- Directive 2001/42/EC on the assessment of the effects of certain plans, and programmes on the environment i.e., the SEA Directive [See reference 9];
- The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633) [See reference 10], as amended by the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) [See reference 11];
- Strategic Environmental Assessment and Sustainability Appraisal National Planning Practice Guidance [See reference 12];
- A Practical Guide to the Strategic Environmental Assessment Directive [See reference 13];
- Guidance on Integrating Climate Change and Biodiversity into Strategic Environmental Assessment [See reference 14];
- Guidance on Strategic Environmental Assessment / Sustainability Appraisal and the Historic Environment [See reference 15];
- Strategic Environmental Assessment: Improving the effectiveness and efficiency of Strategic Environmental Assessment / Sustainability Appraisal for land use plans [See reference 16];
- Draft Guidance on Assessing Health Impacts in Strategic Environmental Assessment [See reference 17]; and
- Health Impact Assessment in spatial planning: A guide for local authority public health and planning teams [See reference 18].

1.33 The Levelling-up and Regeneration Act 2023 (LURA 2023) [See reference 19] provides for changes to the planning system, including the replacement of the current environmental reports regime. These changes have not been

brought forward through secondary legislation at the time of writing this report. Any future changes to the planning system through the LURA will be picked up at later stages of the IIA process, where it is appropriate to do so.

Where the SEA Regulations are addressed in this Scoping Report

1.34 The text in this section signposts the relevant sections of the Scoping Report that are considered to meet the SEA Regulations requirements (the remainder will be met during subsequent stages of the IIA of the WLWP). This section will be updated and included in the full IIA Report at each stage of the IIA to show how the requirements of the SEA Regulations have been met through the IIA process.

Regulation 12 and Schedule 2

1.35 The SEA Regulations require the responsible authority to prepare, or secure the preparation of, an 'environmental report', which in this case comprises the IIA report. The environmental report must identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives, taking into account the objectives and geographical scope of the plan or programme (Regulation 12). The information required by Schedule 2 of the SEA Regulations is set out below, indicating which part(s) of the IIA Scoping Report provide that information:

- An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.
 - Covered in **Chapter 1** of this Scoping Report.
- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.
 - Covered in **Chapter 3** of this Scoping Report.
- The environmental characteristics of areas likely to be significantly affected.
 - Covered in **Chapter 3** of this Scoping Report.
- Any existing environmental problems which are relevant to the plan or programme including those relating to any areas of a particular

environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.

- Covered in **Chapter 3** of this Scoping Report.
- The environmental protection objectives established at international, community or national level that are relevant to the plan or programme and the way those objectives and any environmental considerations have been considered during its preparation.
 - Covered in **Chapter 2** and **Appendix A** of this Scoping Report. **Chapter 4** describes the IIA Framework, which shows how the objectives have been considered.
- The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and the interrelationship between these issues.
 - This requirement will be met at a later stage in the IIA process. **Chapter 4** describes the method by which significant effects will be identified.
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.
 - This requirement will be met at a later stage in the IIA process.
- An outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken, including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.
 - This requirement will be met at a later stage in the IIA process.
- A description of measures envisaged concerning monitoring in accordance with Regulation 17.
 - This requirement will be met at a later stage in the IIA process.
- A non-technical summary of the information provided under the above headings.

- This requirement will be met at a later stage in the IIA process.

1.36 The report shall include the information that may reasonably be required considering current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process, and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3)).

- This is addressed throughout the Scoping Report.

1.37 When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible authority shall consult the consultation bodies (Reg. 12(5)).

- Consultation will be undertaken on the IIA Scoping Report in Spring 2025 with the three consultation bodies (Environment Agency, Historic England and Natural England).

Regulation 13

1.38 Authorities with environmental responsibility, and the public, are required to be given an effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Regulation 13).

- Public consultation on the WLWP and accompanying IIA Reports will take place as the WLWP develops in accordance with the LPAs' Local Development Schemes.

Regulation 14

1.39 EU Member States must be consulted where the implementation of the plan or programme is likely to have significant effects on the environment of that Member State (Regulation 14).

- The WLWP is not expected to have significant effects on any EU Member States.

Regulation 16

1.40 Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed:

- The plan or programme as adopted;
- A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed, and the results of consultations entered have been considered, and the reasons for choosing the option set out in the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures to be taken to monitor the likely significant effects of the plan or programme.
 - To be addressed after the WLWP is adopted.

Regulation 17

1.41 Monitoring of the significant environmental effects of the plan's or programme's implementation.

- To be addressed after the WLWP is adopted.

Quality assurance

1.42 Environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.

- This Scoping Report has been produced in line with current guidance and best practice for SEA/SA and this section has demonstrated where the requirements of the SEA Regulations have been met.

Structure of the Scoping Report

1.43 This chapter describes the background to the production of the emerging updated West London Waste Plan and the requirement to undertake SA and the other assessment processes included in the IIA. The remainder of this Scoping Report is structured into the following sections:

- **Chapter 2** presents the policy context for the emerging updated WLWP and the IIA. (**Appendix A** provides more detail on the environmental protection and other relevant objectives within international and national plans and programmes.)
- **Chapter 3** presents the environmental, social and economic baseline against which the effects of the policies and site options in the emerging updated WLWP will be assessed. It also identifies the key environmental, social and economic issues in the WLWP area of relevance to the emerging updated WLWP and considers the likely evolution of those issues without its implementation.
- **Chapter 4** presents the IIA framework that will be used for the appraisal of the emerging updated WLWP and the proposed method for carrying out the IIA.
- **Chapter 5** describes the next steps to be undertaken in the IIA of the emerging updated WLWP.

Chapter 2

Relevant Plans and Programmes

2.1 The WLWP is not being prepared in isolation and needs to be consistent with international and national policy and guidance and should contribute to the goals of a wide range of other programmes and plans. It must also conform to environmental protection legislation and the sustainability objectives established at the international, national and local levels.

2.2 Schedule 2 of the SEA Regulations requires:

- (1) “an outline of the...relationship with other relevant plans or programmes”; and
- (5) “the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”

2.3 In order to establish a clear scope for the IIA it is necessary to review and develop an understanding of the environmental, social and economic objectives contained within international and national plans and programmes that are of relevance to the emerging updated WLWP. This chapter presents a summary review of key international and national plans and programmes, with further detail included in **Appendix A**. The review is not exhaustive, and an exhaustive approach would not be proportionate or be useful in understanding the policy environment that the emerging updated WLWP must be prepared within. Instead, the review focuses on a limited number of key policy documents that are of particular relevance in setting the parameters of what the emerging updated WLWP should cover.

Key international plans and programmes

2.4 Relevant international plans and policy (including those at the EU level) are transposed into national plans, policy and legislation and these have been considered.

2.5 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the ‘SEA Directive’) and Directive 92/43/EEC on the conservation of natural habitats and

of wild fauna and flora (the 'Habitats Directive') have been transposed into UK Regulations. They are particularly significant given that Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) are to be undertaken in relation to the emerging WLWP. These assessment processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on nature conservation sites of international importance) are identified and can be mitigated.

2.6 Furthermore, the 2030 Agenda for Sustainable Development (2015) [**See reference 20**] initiative, adopted by all United Nations Member States, provides their shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SDG 6: Clean Water and Sanitation
- SDG 08: Decent Work and Economic Growth
- SDG 09: Industry, Innovation and Infrastructure
- SDG 11: Sustainable Cities and Communities
- SDG 12: Responsible Consumption and Production
- SDG 13: Climate Action
- SDG 14: Life Below Water.
- SDG 15: Life on Land.

2.7 Further detail on the relevant international plans and programmes is included in **Appendix A**.

Key national plans and programmes

2.8 The National Planning Policy Framework (NPPF) [**See reference 21**] is the overarching planning framework which provides national planning policy and principles for the planning system in England. The updated WLWP must be consistent with the requirements of the NPPF which sets out information about the purposes of local plan-making. It states:

“Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other

economic, social and environmental priorities; and a platform for local people to shape their surroundings”.

2.9 The NPPF does not contain specific waste policies. National waste planning policies are contained in the National Planning Policy for Waste (NPPW, 2015). The policies state that when preparing Local Plans, waste planning authorities should take account of a number of criteria including:

- Driving waste up the waste hierarchy (i.e. focusing on prevention or reduction of waste first, then recovery of value from waste by means of recycling, re-use or reclamation or any other process with a view to extracting secondary raw materials, or the use of waste as a source of energy, with safe disposal of waste as a last resort);
- Identifying the need for waste management facilities;
- Working jointly and collaboratively with other planning authorities to provide a network of waste management facilities to deliver sustainable waste management; and,
- Identifying suitable sites and areas for additional waste management facilities in line with the proximity principle, giving priority to the re-use of previously developed land.

2.10 The NPPW is supported by Planning Practice Guidance (PPG) on Waste (2015) [See reference 22]. The PPG provides guidance on implementing the waste hierarchy, the preparation of local plans and Sustainability Appraisals for waste local plans, and determining planning applications for waste management facilities. According to the guidance on flood risk and coastal change, waste management facilities are classified as less vulnerable and are suitable in all flood zones, excluding 3b (the functional floodplain). Landfills and sites used for management of hazardous waste are considered to be more vulnerable and are suitable only in Flood Zones 1 and 2, and potentially 3a.

2.11 Also of relevance to the WLWP is the National Waste Management Plan for England (2021) [See reference 23] which provides an analysis of the current waste management situation in England and partially fulfil the requirements of the revised Waste Framework Directive for Member States to plan for waste on a national basis enshrined into law by the Waste (England and Wales) Regulations 2011 [See reference 24]. The production of the updated WLWP is intended to fulfil this obligation.

2.12 The national plans and programmes that are of greatest relevance to the emerging updated WLWP are set out below. Further detail on the national plans

and programmes is included in **Appendix A**. It should be noted that some of the documents will be updated in the timeline of preparing the IIA for the WLWP. This list will be updated at each stage of the IIA, where appropriate.

■ National Legislation:

- HM Government (2021) The Environment Act 2021
- HM Government (2010) Flood and Water Management Act 2010
- HM Government (2008) The Climate Change Act 2008 (as amended)
- HM Government (2008) The Planning Act 2008
- HM Government (2006) The Natural Environment and Rural Communities (NERC) Act
- HM Government (2003) Sustainable Energy Act
- HM Government (2000) Countryside and Rights of Way Act 2000
- HM Government (1990) Planning (Listed Building and Conservation Areas) Act
- HM Government (1990) Environmental Protection Act 1990
- HM Government (1981) The Wildlife and Countryside Act 1981
- HM Government (1979) Ancient Monuments and Archaeological Areas Act 1979

■ National Regulations:

- HM Government (2022) The Environmental Targets (Residual Waste) (England) Regulations 2022.
- HM Government (2020) The Waste (Circular Economy) (Amendment) Regulations 2020
- HM Government (2017) The Conservation of Habitats and Species Regulations 2017 (as amended)
- HM Government (2016) Environmental Permitting (England and Wales) Regulations 2016
- HM Government (2015) Water Framework Directive (England and Wales) (Amendment) Regulations 2015
- HM Government (2011) The Waste (England and Wales) Regulations 2011 (as amended)
- HM Government (2011) The Animal By-Products (Enforcement) (England) Regulations 2011

- HM Government (2010) The Conservation of Habitats and Species Regulations 2010
- HM Government (2006) Waste Management (England and Wales) Regulations 2006
- HM Government (2005) The Hazardous Waste (England and Wales) Regulations 2005
- HM Government Circular 1/2003: Safeguarding, Aerodromes, Technical Sites and Military Explosive Storage Areas
- HM Government (2002) Air Quality (England) (Amendment) Regulations 2002
- HM Government (2002) The Landfill (England and Wales) Regulations 2002
- HM Government (1994) Urban Waste Water Treatment (England and Wales) Regulations 1994
- National Plans, Programmes and Strategies:
 - MHCLG and DLUHC National Planning Practice Guidance (living document)
 - MHCLG (2024) National Planning Policy Framework
 - DECC (2024) Overarching National Policy Statement for energy & National Policy Statement for Renewable Energy Infrastructure (EN-3)
 - DEFRA (2023) Environmental Improvement Plan
 - British Energy Security Strategy (2022)
 - Environment Agency (2022) National Flood and Coastal Erosion Risk Management Strategy for England
 - DLHC (2022) Flood risk and coastal change guidance
 - Environment Agency (2022) Flood risk assessments: climate change allowances – National Guidance
 - DLUHC (2021) National Design Guide
 - BEIS (2021) Industrial Decarbonisation Strategy
 - DEFRA (2021) National Waste Management Plan for England
 - HM Government (2021) Net Zero Strategy: Build Back Greener
 - DfT (2021) Transitioning to zero emission cars and vans: 2035 delivery plan – National Guidance

- Natural England (2021) Guide to assessing development proposals on agricultural land – National Guidance
- MHCLG (2019) Clean Air Strategy
- DEFRA (2018) 'A Green Future: Our 25 Year Plan to Improve the Environment'
- Environment Agency (2017) Groundwater protection guides
- DEFRA (2017) Groundwater Protection
- DECC (2014) Community Energy Strategy
- DCLG (2014) National Planning Policy for Waste
- DCMS (2013) Scheduled Monuments & Nationally Important but Non-Scheduled Monuments Policy Statement
- DEFRA (2013) Hazardous Waste National Policy Statement
- HM Government (2013) Waste prevention programme for England: Prevention is better than cure – The role of waste prevention in moving to a more resource efficient economy
- DEFRA (2012) National Policy Statement for Waste Water
- DECC (2012) Strategy for the management of solid low level radioactive waste from the non-nuclear industry
- Government Policy Papers:
 - DEFRA (2023) Waste prevention programme for England: Maximising Resources, Minimising Waste
 - BEIS (2022) British Energy Security Strategy Policy Paper
 - DEFRA (2022) Landscapes Review (National Parks and AONBs): government response
 - DfT (2022) Air quality: clean air zone framework for England
 - DEFRA (2021) The Water White Paper
 - DEFRA (2020) Rural proofing in England 2020
 - DEFRA (2020) Agricultural Transition Plan 2021 to 2024
 - Environment Agency (2020) National Flood and Coastal Erosion Risk Management Strategy for England
 - HM Government (2019) Clean Air Strategy 2019
 - DEFRA (2018) Our Waste, Our Resources: A strategy for England
 - HM Government (2017) Litter Strategy for England

- DEFRA (2011) Safeguarding our Soils: A Strategy for England
- DEFRA (2011) Future Water: The Government's Water Strategy for England

Regional, sub-regional and local plans and programmes

2.13 It is not a requirement of the SEA Regulations to describe the relevance of policy objectives established at sub-national level for the emerging updated WLWP. However, since they set out requirements the emerging updated WLWP must meet (the London Plan) and provide further context, those considered of most relevance (e.g. relating to the economy, transport, climate change and green infrastructure) are listed below.

- Key Greater London Authority (GLA) policies, strategies and guidance
 - The London Plan (2021) and any amendment
 - London Local Nature Recovery Strategy (in progress)
 - Urban Greening Factor London Plan Guidance (LPG) (2023)
 - Air quality neutral LPG (2023)
 - Air quality positive LPG (2023)
 - Characterisation and Growth Strategy (2023)
 - Optimising Site Capacity: A Design-Led Approach LPG (2023)
 - London Environment Strategy (2022)
 - Sustainable Transport, Walking and Cycling (2022)
 - Whole life carbon LPG (2022)
 - Energy Planning guidance (2022)
 - Circular economy statements LPG (2022)
 - Be Seen energy monitoring LPG (2021)
 - Climate Action Strategy 2020–2027 (2020)
 - London Sustainable Drainage Action Plan (2015)
 - The control of dust and emissions in construction Supplementary Planning Guidance (SPG) (2014)
 - Accessible London SPG (2014)

Key Local Plans, programmes and policies

2.14 There are also a wide range of plans and programmes at the Borough / Local Authority scale plus a combined waste disposal authority in the form of the West London Waste Authority that initiates programmes across the west London area. While such local level plans do not set policy objectives that the WLWP must follow, the WLWP may nevertheless need to take into account development provided for by those local level plans. This section therefore also lists local level plan, policy and strategy documents considered of greatest potential relevance to the WLWP, identified by the Waste Planning Authorities as part of the evidence gathering exercise. The list includes plans and strategies that have either been adopted or, where applicable, have reached Regulation 19 stage at the date this document was published. Chapter 3 which sets out the baseline of the WLWP area, draws from these local plans, programmes and policies, as well as other documents and published data, to highlight future trends relevant to waste management in West London, such as the scale and distribution of each London Borough's housing and employment growth.

- West London wide:
 - West London Local Area Energy Plan – Phase 1 (2023)
 - West London Strategic Flood Risk Assessment (2018)
 - Strategic Environmental Assessment of the WLWP (2015)
 - The adopted waste plan - West London Waste Plan (2015)
 - West London Waste Authority Household Reuse and Recycling Centre Report (2024)
 - West London Waste Authority Circular Economy and Net Zero Carbon update (2021)
 - Treating Waste as a valuable resource – West London Waste Annual Report (2021)
 - New Joint Municipal Waste Management Strategy Report 2020–2035 (2020)
 - West London Waste Authority Business Plan 2020–2035 (2020)
- London Borough of Brent:
 - Brent Local Plan 2019-2041 (2022)
 - Local Development Scheme (2025)
 - Brent Authority Monitoring Report 20121/22 & 2022/23 (2024)

- Air Quality Action Plan (2023)
- Sustainable Environment and Development SPD (2023)
- Air quality monitoring and reports (2019 – 2023)
- Neasden Stations Growth Area and Supplementary Planning Document (2022)
- Brent Climate & Ecological Emergency Strategy 2012- 2030 (2021)
- Locally listed buildings (2020)
- Strategic Flood Risk Assessment Level 2 (2020)
- Strategic Flood Risk Assessment Level 2 Appendix B (site assessments) (2020)
- Historic Environment Place-making Strategy (2019)
- Declared Climate Emergency (2019)
- Brent Infrastructure Delivery Plan (2019)
- Brent Design Guide Supplementary Planning Document (2018)
- Waste and Recycling Storage and Collection Guidance for Residential Properties (2013)
- London Borough of Ealing:
 - Ealing’s Draft Local Plan (2024)
 - West London Employment Land Review (2022)
 - Local Development Scheme (2023)
 - Green Belt and Metropolitan Open Land (MOL) Review Stage 2 (2024)
 - Sites for Importance Nature Conservation (2024)
 - Strategic Flood Risk Assessment – Level 2 (2024)
 - Ealing Infrastructure Delivery Plan Part One: Infrastructure Baseline Report (2024)
 - Ealing Infrastructure Delivery Plan Part Two: Infrastructure Delivery Schedule (2024)
 - Delivering Net Zero (2023)
 - Generic Management Plan for Conservation Areas (2023)
 - Health and Wellbeing Strategy 2023-2028 (2023)
 - Green Belt and Metropolitan Open Land (MOL) Review Stage 1 (2022)
 - Climate and Ecology Emergency Strategy (2021)

- Ealing’s Authority Monitoring Report 2018/19 (2021)
- Ealing Council Air quality strategy 2022–2030 (2019)
- Ealing Council Transport Strategy 2019-2022 (2018)
- Ealing Council Waste management guidelines for architects and developers (2018)
- Development Management DPD (2013)
- Development Sites DPD (2013)
- Development Strategy 2026 (2012)
- London Borough of Harrow:
 - New Harrow Local Plan (2024)
 - Harrow Biodiversity Net Gain (Regulation 19 working draft) (2024)
 - Harrow Infrastructure Delivery Plan (2024)
 - Harrow Views Management Guidance (2024)
 - New Harrow Local Plan Strategic Flood Risk Assessment – Level 2 (2024)
 - West London Employment Land Review (2022)
 - Delivering Net Zero Carbon Report (2023)
 - Harrow Long term Transport Strategy – Consultation Draft (2023)
 - Harrow Tall Buildings SPD (2023)
 - Living Harrow: The London Borough of Harrow’s Climate and Nature Strategy 2023-2030 (2023)
 - Local Development Scheme (2023)
 - Edgware Growth Area SPD (2021)
 - Harrow Local Plan Authority’s Monitoring Report (2021)
 - Harrow Biodiversity Action Plan 2015–2020 (2015)
- London Borough of Hillingdon:
 - Local Development Scheme (2025)
 - Hillingdon Local Plan Part 2: Site Allocations and Designations (2020)
 - Hillingdon Local Plan Part 2: Development Management Policies (2020)
 - Authority Monitoring Report (2019)

- Hillingdon Third Local Implementation Plan 2019–2041 (2019)
- Development Infrastructure Study (DIFS) (2017)
- London Borough of Hillingdon Strategic Infrastructure Plan (SIP) (2017)
- London Borough of Hounslow:
 - Hounslow Transport Strategy (2025)
 - Local Plan Volumes 1 and 2 (2015)
 - Emerging (proposed submission version) Hounslow Local Plan 2020-2041 (2024)
 - Emerging Climate Change Mitigation and Adaptation SPD
 - Character, Sustainability and Design Codes SPD (2024)
 - Draft Infrastructure Delivery Plan (2024)
 - Hounslow Characterisation & Growth Study (2024)
 - Hounslow Local Development Scheme (2025)
 - Nature Recovery Action Plan (NRAP) 2023–2028 (2023)
 - Authority Monitoring Report (2022)
 - Recycling and Refuse Guidance (2022)
 - Climate Emergency Action Plan (2020)
 - Planning obligations and CIL SPD (2015)
 - Air Quality SPD (2008)
- London Borough of Richmond upon Thames:
 - Richmond Local Plan Publication (Regulation 19) Consultation Version (2023) – undergoing examination
 - Infrastructure Delivery Plan Addendum (2024)
 - Local Development Scheme (2025)
 - Local Plan Infrastructure Delivery Plan (2023)
 - Richmond upon Thames Reduction and Recycling Plan (2025)
 - Net Zero Carbon Study (2023)
 - Employment Land and Premises Needs Assessment (2021)
 - Strategic Flood Risk Assessment – Level 1 Update (2021)
 - Air Quality SPD (2020)
 - Sustainable Construction Checklist Guidance Document (2020)

- Planning Obligations SPD (2020)
- Transport SPD (2020)
- Climate Emergency and Nature Strategy (2025)
- Development Control for Noise Generating and Noise Sensitive Development (2018)
- Richmond Preliminary Flood Risk Assessment (2011)
- Old Oak Common & Park Royal Development Corporation
 - OPDC Local Plan 2018-2038 (2022)
 - Policies Map (2022)
 - Authority Monitoring Report (2023-2024)
 - Integrated Impact Assessment (2021)
 - Local Development Scheme (2018)
 - Old Oak West SPD part 1 (2024)
 - Old Oak West SPD part 2 (2024)
 - Public Realm and Green Infrastructure SPD (2024)
 - OPDC Biodiversity and Urban Greening Strategy (undated)
 - Industrial SPD (2023)
 - Waste Management in High Density Development SPD (2022)
 - Industrial Land Review Addendum (2021)
 - Infrastructure Delivery Plan (2021)
 - OPDC Landscape Strategy (2020)
 - Integrated Water Management Strategy (2018)
 - Old Oak North Development Framework Principles (2018)
 - Park Royal Development Framework Principles (2018)
 - Park Royal Transport Strategy (2018)
 - Waste Apportionment Study (2018)
 - Waste in Tall Buildings Study (2018)
 - Waste Management Strategy (2018)
 - Waste Technical Paper (2018)

Chapter 3

Baseline Information and Key Issues

3.1 Baseline information provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps to identify key sustainability issues.

3.2 Schedule 2 of the SEA Regulations requires information to be provided on:

1. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.
2. The environmental characteristics of areas likely to be significantly affected.
3. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and the Habitats Directive [92/43/EEC].

3.3 The environmental, social and economic baseline for the WLWP is set out in this chapter under the following topic headers:

- Waste.
- Climate change, adaptation and mitigation.
- Population, health and wellbeing.
- Economy.
- Transport.
- Historic environment.
- Landscape and townscape.
- Biodiversity and Geodiversity.
- Air, land and water quality.

3.4 In line with the requirements of Schedule 2 of the SEA Regulations (see box above), analysis of baseline information and the policy context has informed identification of sustainability issues facing the Local Planning Authorities party

to the emerging updated WLWP. The key sustainability issues that have been identified are set out underneath each baseline topic section, along with an indication of the likely evolution of these issues without the emerging updated WLWP, i.e. whether the WLWP could avoid exacerbating these issues or help to solve them. It is assumed that even if the emerging updated WLWP were not adopted, there would still be the policies in the NPPF, NPPW, the London Plan, the adopted WLWP and West London Local Plans, which would all provide policies that any new waste management applications would be assessed against.

3.5 Maps illustrating the spatial dimension of some of the baseline conditions described below are presented at the end of this chapter.

Waste

Waste Streams

3.6 An “Assessment of Existing Waste Management Capacity in West London 2025” [See reference 25] has been prepared to inform the emerging updated WLWP supported by baseline and forecasts for C,D&E waste [See reference 26] and Hazardous Waste in the Plan area [See reference 27]. Drafts of these documents have been used to prepare the following text. The baseline will be updated within future iterations of the IIA as more information becomes available.

3.7 The London Plan 2021 includes forecast arisings of Local Authority Collected Waste (referred to as household waste) plus Commercial and Industrial waste for London by Borough to 2041 - collectively referred to as HIC waste. These forecasts are used as a starting point to allocate quantities of HIC waste to be managed by each Borough in west London in specific ways (referred to as qualifying capacity as set out below) so that the overall goal of managing the equivalent of 100 per cent of London’s waste within London (i.e. net self-sufficiency) by 2026 (London Plan Policy SI 8) is achieved. This specifically excludes excavation waste from the aim of overall net self-sufficiency as the particular characteristics of this waste stream mean that it will be challenging for London to provide either the sites or the level of compensatory provision needed (paragraph 9.8.1 of the London Plan). These allocations of HIC waste for management are referred to as "LP apportionments". The apportionments have been derived through a process that includes assessment of existing capacity in each Borough along with a number of other factors that are considered to determine the ability of a

particular Borough to accommodate qualifying waste management capacity [See reference 28].

3.8 The types of capacity considered to count towards the management of apportioned HIC waste (referred to as "qualifying capacity") are listed in paragraph 9.8.4 of the London Plan as follows:

- energy recovery in London;
- production of solid recovered fuel (SRF) and refuse derived fuel (RDF) in London;
- sorting or bulking for re-use or recycling including anaerobic digestion. The reuse or recycling may take place within or outside London providing the sorting and bulking capacity is located within London; and
- reuse or recycling including anaerobic digestion within London.

3.9 The London Plan also sets out management targets for waste generated in London in Policy SI 7 Reducing waste and supporting the circular economy as follows:

- ensure that there is zero biodegradable or recyclable waste arising in London going to landfill by 2026;
- meet or exceed the municipal waste recycling target of 65 per cent by 2030 (London Plan Footnote 163: Based on the EU definition of municipal waste being household waste and other waste similar in composition to household waste. This includes business waste collected by local authorities and by the private sector.);
- meet or exceed the targets for each of the following waste and material streams:
 - construction and demolition – 95 per cent reuse/recycling/recovery
 - excavation – 95 per cent beneficial use (London Plan Footnote 164 All inert excavation waste should be used for beneficial purposes.)

3.10 In addition, in connection with hazardous waste management capacity, paragraph 9.8.18 of the London Plan states "...a need to continue to identify hazardous waste capacity for London. The main requirement is for sites for regional facilities to be identified. Boroughs will need to work with neighbouring authorities to consider the necessary facilities when planning for their hazardous waste." Hence there is no expectation that London should be net self-sufficient in management capacity for hazardous waste alone, although

hazardous waste that arises in the HIC waste stream is included in the LP apportionment values (Para 9.8.18 LP).

3.11 The report provides an assessment of how the existing waste management capacity in West London meets the management requirements for:

- household, commercial and industrial waste (HIC) apportioned to the six Boroughs by the London Plan 2021 through to 2041; and
- Construction, Demolition and Excavation (C, D & E) waste and hazardous waste forecast to arise in West London to 2041.

3.12 The methodology applied replicates that used to undertake the capacity assessment that underpinned the adopted WLWP (July 2015) following examination, where the methodology was subject to scrutiny and its outputs found sound by the Inspector. The findings of the capacity review are set out below.

Qualifying Management Capacity for Apportioned HIC Waste

3.13 There is sufficient qualifying management capacity to manage the LP apportioned HIC waste to 2041.

Management Capacity for C, D & E Waste

3.14 There is sufficient capacity to manage the forecast C, D & E waste arisings from West London to 2041.

Landfill Capacity for Residual non-inert waste

3.15 In the absence of any operational non-hazardous landfill capacity in the Plan area, and the expectation of a continuing, albeit reducing, requirement for non-hazardous waste landfill, estimated to be c33,500 tonnes per annum at 2025 declining to c17,500 tonnes per annum in 2041, there will be a need to export residual waste for which landfill remains the only management option through to 2041.

3.16 The cumulative non-inert waste landfill capacity requirement for the whole Plan area is estimated to be c. 0.43Mt by the end of the Plan period 2041.

Permanent Deposit to Land Management Capacity for Inert Waste

3.17 There is a predicted shortfall in inert excavation waste permanent deposit to land capacity throughout the Plan period. This will need to be met either through export or incorporation into development sites for such purposes as acoustic or visual bunding or flood alleviation.

Management Capacity for Hazardous Waste

3.18 There is sufficient capacity to manage the forecast hazardous waste arisings in the Plan area with the exception of milestone 2031 when arisings are forecast to peak but then tail off. As stated previously there is no policy expectation that individual Plan areas be net self-sufficient for the management of hazardous waste forecast to be produced.

Waste key issues and evolution without the WLWP

3.19 The emerging updated evidence indicates that there is likely to be sufficient capacity at existing waste management sites in West London to deal with waste arisings as required through national policy and the London Plan (2021), and therefore there should not be a need to allocate additional sites for the development of new waste facilities in the plan. As with the adopted WLWP, there may be opportunities for redevelopment of facilities at existing sites to increase capacity, and in the future it may also be the case that existing sites could make better use of rail transport. Without the WLWP, these opportunities could be missed.

Climate change adaptation and mitigation

Climate change predictions

3.20 Climate change presents a global risk, with a range of different social, economic and environmental impacts that are likely to be felt across numerous receptors. A key challenge in protecting the environment will be to tackle the causes and consequences of climate change. The consequences include predictions of warmer, drier summers and wetter winters with more severe weather events all year as well resulting in higher sea levels and increased river flooding. A strong reaction is required from planning to ensure appropriate

action can be taken to help species and habitats adapt and to enable the agricultural sector to continue to deliver diverse, affordable and good quality produce.

3.21 There has been a general trend towards warmer average temperatures in recent years. 2024 was provisionally the fourth warmest year on record for the UK, with a mean temperature of 9.78°C, which is 0.64°C above the 1991 – 2020 average. Only 2022, 2023, and 2014 recorded higher average temperatures. All the top ten warmest years for the UK in the series from 1884 have occurred since 2000, with five of them in the most recent decade (2015 – 2024) [\[See reference 29\]](#).

3.22 Heavy rainfall and flooding events have been demonstrated to have increased potential to occur in the UK as the climate has generally become wetter. For example, five of the 10 wettest years for the UK in the series from 1836 have occurred in the 21st century. The most recent decade (2014–2023) has been 2% wetter than 1991–2020 and 10% wetter than 1961–1990 [\[See reference 30\]](#). 2024 was another relatively wet year with the UK recording 1242mm, 107% of average rainfall. It was particularly wet across parts of central southern England with a quarter to a third more rain than normal. Oxfordshire, Wiltshire, Gloucestershire, Bedfordshire and Buckinghamshire each recorded their second-wettest year in records from 1836. England had its 8th wettest year, although not as wet as 2023 (ranked 4th) [\[See reference 31\]](#).

3.23 The Intergovernmental Panel on Climate Change (IPCC) special report on global warming outlines that, under emissions in line with current pledges under the Paris Agreement, global warming is expected to surpass 1.5°C, even if these pledges are supplemented with very challenging increases in the scale and ambition of mitigation after 2030. This increased action would need to achieve net zero CO₂ emissions in less than 15 years [\[See reference 32\]](#).

3.24 In December 2018, the London Assembly declared a climate emergency and called on the Mayor of London to do likewise and put in place specific emergency plans so that London is carbon neutral by 2030 [\[See reference 33\]](#). The Mayor declared a climate emergency shortly after the Assembly and set a target for London to be net zero-carbon by 2030.

3.25 Climate change emergencies have been declared by each of the West London Boroughs. These occurred in:

- London Borough of Brent: July 2019 [\[See reference 34\]](#)
- London Borough of Ealing: April 2019 [\[See reference 35\]](#)

- London Borough of Harrow: July 2019 [See reference 36]
- London Borough of Hounslow: June 2019 [See reference 37]
- London Borough of Hillingdon: January 2020 [See reference 38]
- London Borough of Richmond upon Thames: July 2019 [See reference 39]

3.26 The OPDC as a mayoral development corporation has not made its own declaration but, as noted above, the Mayor of London declared a climate emergency in 2018.

3.27 UK Climate Projections 18 (UKCP18) for London identify the following main changes (relative to 1981-2000) to the climate by the end of the plan period (2038) [See reference 40]:

- Increase in mean winter temperature by 0.9°C;
- Increase in mean summer temperature by 1.3°C;
- Increase in mean winter precipitation by 8%; and
- Decrease in mean summer precipitation by -9%.

3.28 The UK Climate Risk Independent Assessment (CCEA3) identifies likely trends from climate change and sets out 61 specific risks and opportunities to the UK from climate change, including the following [See reference 41]:

Risks

- The number of incidents of food poisoning, heat stress and heat related deaths may increase in summer.
- Domestic energy use may increase during summer months as refrigeration and air conditioning demand increases.
- Wetter winters and more intense rainfall events throughout the year may result in a higher risk of flooding from rivers.
- More intense rainstorms may in some locations result in the amount of surface water runoff exceeding the capacity of drainage systems, consequently leading to more frequent and severe localised flash flooding.
- More frequent storms and floods may cause increased damage to property and infrastructure, resulting in significant economic costs.

- Periods of drought in summer could lead to soil shrinking and subsidence, causing damage to buildings and transport networks. Drought may also impact negatively on agriculture, industry and biodiversity.
- Warmer and drier summers are likely to affect the quantity and quality of water supply, which will need careful management.
- The changing climate will impact on the behaviour and distribution of species and may encourage the spread of invasive species.

Opportunities

- Milder winters should reduce the costs of heating homes and other buildings, helping to alleviate fuel poverty and reducing the number of winter deaths from cold.
- Domestic energy use may decrease in winter due to higher temperatures.
- Warmer and drier summers may benefit the recreation and tourism economy.

Emissions and energy

3.29 Carbon dioxide (CO₂) is the main greenhouse gas, accounting for about 80% of the UK greenhouse gas emissions. Emissions are produced when fossil fuels such as coal or gas are burnt or processed. In recent years, increasing emphasis has been placed on the role of regional bodies and local government in contributing to energy efficiency improvements, and hence reductions in carbon dioxide emissions. In line with the wider UK, London has seen a decrease in CO₂ emissions in recent years. One of the main drivers for reduced levels of emissions has been a decrease in the use of coal for electricity generation, accounting for a decrease in emissions for domestic electricity.

3.30 The Government regularly publishes local authority and regional carbon dioxide emissions national statistics [See reference 42]. The statistics are largely consistent with the UK national Greenhouse Gas Inventory and with the Devolved Administration Greenhouse Gas Inventories. In London, CO₂ emissions have fallen from 6.4 tonnes (t) per capita to 2.9t per capita (equivalent to a 75% reduction) from 2005 to 2022. Emissions in each of the West London Boroughs (excluding OPDC) are like those of London, falling

steadily over the same period as demonstrated in **Table 3.1 (Total Emissions)** and **Table 3.2 (Per Capita Emissions)**.

Table 3.1: CO₂ emissions estimates in the WLWP Area 2005-2022 (Kt)

Year	Brent	Ealing	Harrow	Hounslow	Hillingdon	Richmond
2005	1,514.9	1,796.1	1,050.7	1,664.3	2,399.9	1,081.7
2006	1,535.3	1,814.0	1,035.0	1,693.3	2,385.1	1,076.0
2007	1,492.1	1,792.6	1,010.4	1,646.7	2,280.8	1,049.8
2008	1,492.9	1,754.9	1,002.4	1,568.6	2,374.8	1,022.9
2009	1,508.3	1,614.6	907.0	1,463.4	2,122.7	931.5
2010	1,370.7	1,678.2	991.6	1,566.6	2,144.8	969.2
2011	1,363.7	1,559.4	889.6	1,460.2	1,870.6	863.4
2012	1,224.4	1,652.3	946.1	1,520.9	2,116.7	925.5
2013	1,421.0	1,640.7	915.7	1,465.5	2,072.5	907.1
2014	1,379.7	1,441.9	801.8	1,308.4	1,780.3	790.8
2015	1,159.5	1,347.3	773.0	1,203.4	1,708.0	750.6
2016	1,072.6	1,250.9	728.1	1,130.7	1,631.6	711.9
2017	1,030.8	1,209.1	691.0	1,061.7	1,564.2	674.8
2018	1,000.4	1,197.8	690.2	1,049.8	1,537.9	666.1
2019	1,022.5	1,125.3	662.6	995.4	1,480.8	631.5
2020	972.7	1,021.3	604.4	860.6	1,229.7	572.6
2021	898.8	1,115.8	611.9	943.4	1,343.5	623.1

Year	Brent	Ealing	Harrow	Hounslow	Hillingdon	Richmond
2022	971.0	1,049.6	556.0	904.8	1,327.8	572.5

Table 3.2: CO2 emissions estimates by West London Borough (per capita, tonnes of carbon dioxide equivalent)

Year	Brent	Ealing	Harrow	Hounslow	Hillingdon	Richmond
2005	5.7	5.7	4.8	7.4	9.5	6.0
2006	5.4	5.8	4.6	7.4	9.4	5.9
2007	5.3	5.6	4.5	7.1	8.9	5.8
2008	5.2	5.4	4.4	6.6	9.1	5.6
2009	4.6	4.9	3.9	6.0	8.0	5.1
2010	4.5	5.0	4.2	6.3	8.0	5.2
2011	3.9	4.6	3.7	5.7	6.8	4.6
2012	4.4	4.8	3.8	5.8	7.5	4.9
2013	4.2	4.6	3.6	5.5	7.3	4.7
2014	3.5	4.1	3.1	4.9	6.1	4.1
2015	3.2	3.8	3.0	4.4	5.8	3.9
2016	3.1	3.5	2.8	4.1	5.5	3.7
2017	3.0	3.4	2.7	3.8	5.2	3.5
2018	3.1	3.3	2.7	3.8	5.1	3.4
2019	2.9	3.1	2.6	3.5	4.9	3.2

Year	Brent	Ealing	Harrow	Hounslow	Hillingdon	Richmond
2020	2.6	2.8	2.3	3.0	4.0	2.9
2021	2.9	3.0	2.3	3.3	4.4	3.2
2022	2.6	2.8	2.1	3.1	4.3	2.9

3.31 The Department for Energy Security and Net Zero produced the following consumption figures for the WLWP area in 2022 **[See reference 43]**:

- **Electricity** – a total of 542.5ktoe predominantly through industrial and commercial use;
- **Petroleum** – a total of 664.2ktoe predominantly through road transport;
- **Bioenergy and wastes** – a total of 55.6ktoe, predominantly through road transport;
- **Coal** – a total of 0.6 kilo tonnes of oil equivalent (ktoe) predominantly through domestic use;
- **Manufactured fuels** – a total of 1.2ktoe predominantly through domestic use; and,
- **Gas** – a total of 899.1ktoe predominantly through domestic use.

3.32 Between 2005 and 2022 the total reported energy consumption (all fuels) for London fell from 14,133.5 to 10,779.2ktoe. The changes in consumption by type are shown in **Tables 3.3-3.9**. Tables for energy consumption for each borough are shown in turn.

Table 3.3: Energy Consumption in London by type - 2005 to 2022

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)	Percentage change
Coal	28.6	15.0	47.6% decrease
Manufactured fuels	8.9	4.6	48.3% decrease

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)	Percentage change
Petroleum	3,645.7	2,801.0	23.2% decrease
Gas	6,865.8	4,760.9	30.7% decrease
Electricity	3,562.8	2,962.6	16.8% decrease
Bioenergy and wastes	21.7	235.1	983.4% increase
Total	14,133.5	10,779.2	23.7% decrease

Table 3.4: Energy Consumption in Brent - 2005 to 2022

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)	Percentage change
Coal	1.2	0.6	50% decrease
Manufactured fuels	0.1	0.1	No change
Petroleum	119.3	93.3	21.8% decrease
Gas	227.3	167.1	26.5% decrease
Electricity	104.9	97.7	6.8% decrease
Bioenergy and wastes	0.5	8.7	1640% increase
Total	453.3	367.4	19% decrease

Table 3.5: Energy Consumption in Ealing - 2005 to 2022

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)	Percentage change
Coal	1.3	0.7	46.2% decrease
Manufactured fuels	0.2	0.1	50% decrease
Petroleum	158.4	117.6	25.8% decrease
Gas	259.9	186.7	28.2% decrease
Electricity	114.4	115.4	0.9% increase
Bioenergy and wastes	0.6	10.0	1566% increase
Total	534.8	430.4	19.5% decrease

Table 3.6: Energy Consumption in Harrow - 2002 to 2025

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)	Percentage Change
Coal	0.5	0.2	60% decrease
Manufactured fuels	0.1	0.1	No change
Petroleum	69.3	54.6	21.2% decrease
Gas	210.9	129.8	38.5% decrease
Electricity	59.2	44.1	25.5% decrease

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)	Percentage Change
Bioenergy and wastes	0.3	4.0	1233% increase
Total	340.3	232.9	31.6% decrease

Table 3.7: Energy Consumption in Hounslow - 2005 to 2022

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)	Percentage Change
Coal	0.5	0.4	20% decrease
Manufactured fuels	0.2	0.3	50% increase
Petroleum	154.7	120.2	22.3% decrease
Gas	203.9	135.8	33.4% decrease
Electricity	115.5	100.1	13.3% decrease
Bioenergy and wastes	0.5	8.4	1580% increase
Total	475.3	365.1	23.2% decrease

Table 3.8: Energy Consumption in Hillingdon - 2005 to 2022

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)	Percentage Change
Coal	1.6	1.4	12.5% decrease

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)	Percentage Change
Manufactured fuels	0.5	0.5	No change
Petroleum	241.1	212.0	12.1% decrease
Gas	304.7	166.6	45.3% decrease
Electricity	153.6	135.3	11.9% decrease
Bioenergy and wastes	6.1	18.7	206.6% increase
Total	707.6	534.4	25.5% decrease

Table 3.9: Energy Consumption in Richmond - 2005 to 2022

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)	Percentage Change
Coal	0.5	0.4	20% decrease
Manufactured fuels	0.1	0.1	No change
Petroleum	84.9	66.6	21.5% decrease
Gas	175.2	113.1	35.4% decrease
Electricity	68.1	49.9	26.7% decrease
Bioenergy and wastes	0.3	6.0	1900% increase
Total	329.1	236.1	28.3% decrease

3.33 The Tyndall Centre for Climate Change Research has undertaken work to calculate the 'fair' contribution of local authorities towards the Paris Climate Change Agreement. Based on the analysis undertaken the following recommendations have been made for London **[See reference 44]**:

- Stay within a maximum cumulative carbon dioxide emissions budget of 203.5 million tonnes (MtCO₂) for the period of 2020 to 2100. At 2017 CO₂ emission levels, London would use this entire budget within 7 years from 2020.
- Initiate an immediate programme of CO₂ mitigation to deliver cuts in emissions averaging a minimum of -12.2% per year to deliver a Paris aligned carbon budget. These annual reductions in emissions require national and local action and could be part of a wider collaboration with other local authorities.
- Reach zero or near zero carbon no later than 2043. The Tyndall Centre report provides an indicative CO₂ reduction pathway that stays within the recommended maximum carbon budget of 203.5 MtCO₂. At 2043 5% of the budget remains. This represents very low levels of residual CO₂ emissions by this time, or the Authority may opt to forgo these residual emissions and cut emissions to zero at this point. Earlier years for reaching zero CO₂ emissions are also within the recommended budget, provided that interim budgets with lower cumulative CO₂ emissions are also adopted.

3.34 Given the trends in carbon emissions and energy consumption at both national and local level, carbon emissions in London and each of the Boroughs within the WLWP area, are likely to continue declining.

Road travel and associated energy consumption

3.35 CO₂ emissions in the UK are provisionally estimated to have increased by 6.3% in 2021 from 2020, to 341.5 million tonnes (Mt), however compared to 2019, the most recent pre-pandemic year, 2021 CO₂ emissions are still down 5.0% **[See reference 45]**. The increase in 2021 is primarily due to the increase in the use of road transport as nationwide lockdowns were eased. CO₂ emissions from transport rose 10.0% in 2021, accounting for almost half of the overall increase from 2020 **[See reference 46]**.

3.36 The overall road energy consumption in London decreased between 2005 and 2022 from 3,068 kilo tonnes of equivalent oil (ktoe) to 2,518.1ktoe. This change was most influenced by the decreasing energy consumption for personal road travel which fell during this period from 2,370.4ktoe to 1,797.3ktoe, potentially attributable to increasing use of electric vehicles (EVs). During this period energy consumption recorded in London for freight uses grew from 697.7ktoe to 720.8ktoe. This growth is due to an increase in outer London, which grew from 449.1ktoe to 509.1ktoe, whilst inner London saw a decrease from 248.6ktoe to 211.7ktoe **[See reference 47]**.

3.37 Recent trends across the UK indicate that diesel consumption excluding biodiesel fell in 2018 for the first time since 2009. The trend is due in part to a slowing of growth in the diesel vehicle fleet following sharp drops in new registrations as well as increased efficiencies. It is expected that the UK will diversify in road transport to include more electric, hybrid and ultra-low emissions vehicles in the coming years **[See reference 48]**.

3.38 The WLWP area benefits from strong transport links and connectivity to Central and Greater London, as well as neighbouring areas such as Berkshire, Buckinghamshire and Surrey. This connectivity will be further enhanced with new sub-regional and national rail connections. The area is well-served by a significant road network, including the A4, A40, A406 and the M4, with convenient access to the M25 and M3.

3.39 Growth in traffic levels may occur in London because of projected population growth and associated development needs. The UK Government aims to ban the sale of new petrol and diesel cars by 2030 **[See reference 49]** which will progressively cut carbon emissions from transport across the UK as fossil fuelled vehicles are replaced with other lower emission vehicles. While the full effect of this will not be seen immediately as people continue to use their existing fossil fuelled vehicles, the market share of electric cars in the UK is already significant and likely to continue to grow rapidly.

3.40 With much of the waste transport in West London occurring by road, there is a need to shift more waste transport to rail or even water-based modes if possible, although with no safeguarded wharves in West London **[See reference 50]**, this is not likely to be feasible in the short term. However, transitioning the waste collection fleet towards EV would also help to reduce waste transport related emissions.

Renewable and low carbon energy

3.41 The National Statistics publication Energy Trends produced by the Department for Business, Energy and Industrial Strategy (now by Department for Energy Security and Net Zero, Department for Science, Innovation and Technology, and Department for Business and Trade), includes data concerning renewable electricity generation, capacity and number of sites at Borough level between 2014 and 2023 **[See reference 51]**.

- In Brent capacity increased from 2.1 MW in 2014 to 9.8 MW in 2023, providing 8,022 MWh of electricity generation in 2023.
- In Ealing capacity increased from 3.4 MW in 2014 to 14.8 MW in 2023, providing 12,241 MWh of electricity generation in 2023.
- In Harrow capacity increased from 1.9 MW in 2014 to 8.4 MW in 2023, providing 7,033 MWh of electricity generation in 2023.
- In Hounslow capacity increased from 11.5 MW in 2014 to 21.7 MW in 2023, providing 12,641 MWh of electricity generation in 2023.
- In Hillingdon capacity increased from 4.3 MW in 2014 to 14.0 MW in 2023, providing 9,983 MWh of electricity generation in 2023.
- In Richmond upon Thames capacity increased from 1.7 MW in 2014 to 7.4 MW in 2023, providing 6,256 MWh of electricity generation in 2023.

3.42 It is clear from the above that capacity to generate renewable and low carbon sources of energy has increased significantly in west London over the past decade. It is considered there is scope to increase capacity further by deploying a range of technology types such as air and ground source heat pumps and solar panels. In addition, there is potential for waste management technologies to supply lower carbon energy.

Flood risk

3.43 The UK Climate Projections (UKCP18) predicts that by 2070, under a high emission scenario, average winter precipitation is projected to increase, whilst average summer rainfall is projected to decrease. Although summer rainfall is projected to decrease, there will be an increased frequency of short-lived high intensity showers **[See reference 52]**.

3.44 All areas within the WLWP will become more vulnerable to fluvial flooding and surface water flooding as the local climate continues to change. The

Thames Tidal Defences provides some protection to the WLWP area. A network of tidal flood defences provides a very high standard of protection in the Thames Estuary. The network includes:

- 330 kilometres (km) of walls and embankments;
- nine major barriers and gates, including the Thames Barrier; and
- over 400 other structures (including flood gates, outfalls and pumps).

3.45 Figure 3.1 at the end of this chapter illustrates the main areas of the WLWP exposed to flood risk.

3.46 Since becoming operational, the Thames Barrier has closed more frequently than originally planned for, as it has widened its remit and now helps manage fluvial flooding to areas upstream of Teddington Weir. The Environment Agency (EA) and Surrey County Council are jointly delivering the River Thames Scheme which focuses exclusively on fluvial flood risk upstream of Teddington Weir. The Thames Estuary 2100 Plan focuses primarily on tidal flood risk downstream of Teddington. There is a group of West London communities that will be impacted by the changes to Thames Barrier closures from 2035 onwards and for these communities the EA has established a separate project to investigate and deliver flood risk management measures to mitigate the change in risk. The EA is delivering the 'West London Communities' project as part of the Thames Estuary 2100 Plan [\[See reference 53\]](#).

3.47 Local flood risk assessments are summarised for each waste planning authority below:

- Brent: From the historical incidence of flooding, Brent has a low to moderate flood risk. The key flood risk to Brent is from surface water flooding. Surface water flooding occurs when the volume and intensity of a rainfall event exceeds the capacity of the sewer system, the responsibility for which lies with Thames Water, plus highway drains. Brent also has a small risk of groundwater flooding which occurs when the water table rises to ground level and inundates low lying areas. If there was a breach in the Welsh Harp Reservoir, the effects would be severe; however, the risk of this happening is low. Responsibility for maintaining the Welsh Harp Reservoir lies with the Canals & River Trust. There is a risk of fluvial flooding from the River Brent and Wealdstone Brook. Brent is at no risk of flooding from the sea [\[See reference 54\]](#).
- Ealing: The Borough is generally considered to have a low overall risk of flooding. However, certain localised areas are more susceptible. The

primary source of river flood risk within the borough is the River Brent. Other significant watercourses include the Osterley Park Boundary Stream and the Yeading Brook, which runs along the Borough's boundary with Hillingdon. Smaller watercourses also pose a flood risk and have the potential to cause disruption or damage to property and infrastructure. Among the Borough's 'ordinary watercourses' are Costons Brook, Dormers Wells Stream, and Northolt Brook, alongside various smaller ditches. Costons Brook has been largely culverted due to development, significantly reducing the risk of flooding from this watercourse [\[See reference 55\]](#).

- Harrow: Although Harrow as a borough has a relatively low susceptibility to surface water flooding, complex interactions exist between the pluvial (surface water), fluvial (river) and sewer systems which may increase the flood risk [\[See reference 56\]](#).
- Hounslow: Hounslow is at risk of flooding from multiple sources including tidal (caused by surges in the Thames Estuary), fluvial (from other rivers, such as the rivers Brent and Crane) and surface water, sewers, and groundwater. The risk of tidal flooding in Hounslow is relatively low due to the presence of the Thames Tidal Defences (TTD) which have been established downstream of the borough [\[See reference 57\]](#)
- Hillingdon: Hillingdon faces a range of flood risks, primarily from surface water, rivers, groundwater and artificial water bodies. River flooding, or fluvial flooding, is a risk along the Borough's principal watercourses, including the River Colne, River Crane, and River Pinn [\[See reference 58\]](#).
- Richmond upon Thames: Richmond is at risk of flooding from multiple sources including tidal (caused by surges in the Thames Estuary), fluvial (from other rivers, such as Beverly Brook and the River Crane) and surface water, sewers, and groundwater [\[See reference 59\]](#).
- OPDC: Overall, flood risk to the OPDC is relatively low for the majority of flood risk sources. Only a small area of the site, to the north west of Park Royal is affected by fluvial flooding associated with the River Brent. Existing property is currently not located within this area of fluvial flood risk. The main source of flood risk directly affecting the Opportunity Area is surface water flooding [\[See reference 60\]](#).

3.48 As previously outlined in the 'climate change predictions' section of this chapter, the climate in London is expected to change, presenting a series of risks. These include wetter winters, more intense rainfall events and more

frequent storms and floods, leading to increased damage to property and infrastructure and significant economic costs. The Environment Agency has provided 'local flood risk assessments: climate change allowances' [See **reference 61**] indicating climate change impacts on peak rainfall intensity and peak river flows.

Implications for health

3.49 Climate change has potential for substantial implications on human health, including:

- Disruption to health, social care, emergency management and waste collection services and schools' provision, from flooding, heatwaves and storms.
- Flooding poses multiple risks to people's health, such as heart attacks, trauma, an increase in waterborne infectious diseases, and common mental and post-traumatic stress disorders. Damage to water and sanitation infrastructure can further reinforce the adverse effects on health.

Climate change key issues and evolution without the WLWP

3.50 There is a need to significantly reduce greenhouse gas emissions to help meet international and national greenhouse gas reduction targets. The emerging updated WLWP may provide opportunities to help achieve this through:

- Encouraging energy efficiency measures in the construction or redevelopment of any buildings associated with waste management facilities.
- Reducing carbon emissions from freight use by supporting the use of low or zero emission transport modes for waste collection, as discussed below in the section covering transport.
- Promoting green infrastructure within any redevelopment of waste sites.

3.51 The effects of climate change in the WLWP area are likely to result in extreme weather events becoming more common and more intense. Flood risk is of particular significance in this regard, alongside heatwaves and drought. Fluvial and surface water flooding poses the most significant risk to the plan area, particularly in areas in close proximity to the River Thames. The emerging

updated WLWP provides an opportunity to help adapt to the unavoidable effects of climate change by:

- Encouraging flood and heat resilient buildings in any redevelopment of waste sites.
- Promoting on-site biodiversity net-gain, as well as links to green infrastructure to deliver flood retention, shading/ cooling, air quality improvements and safe havens for vulnerable species.

Population, health and wellbeing

Population

3.52 In England, more than one in six people (18.4%) were aged 65 years and over on Census Day in 2021. This is an increase of 20.1% since 2011. This is a higher percentage than ever before and contrasts with the increasing amounts of younger people in London. On average in London, the largest age group in 2011 was those aged 25 to 29 years [See reference 62]. More recently, in 2023, the largest age group in Inner London was those aged 25 to 29 years, while in Outer London, it was 35 to 39 years [See reference 63].

3.53 Within West London, Richmond upon Thames has seen the largest increase in residents aged 65 and over, with an increase of 16%, followed by Harrow at 15.4%, Hillingdon with 13.4%, Ealing at 12.1%, and Hounslow with 11.8%. Brent has seen the smallest increase in this age group, with an increase of 11.6% between 2011 and 2021. [See reference 64].

3.54 Since 2011, Hounslow's population has grown by 13.5%, the largest increase among West London boroughs. Hillingdon follows with an 11.7% rise, then Harrow (9.3%), Brent (9.2%), Ealing (8.5%), and Richmond upon Thames (4.4%). With the exception of Richmond upon Thames, these growth rates exceed London's overall increase of 7.7%. **Table 3.10** presents the most recent (2021) population changes for Brent, Ealing, Harrow, Hounslow, Hillingdon, Richmond upon Thames [See reference 65].

3.55 As of 2021, Richmond upon Thames is the fourth least densely populated local authority area in London, with a population density of 3,401 people per km² [See reference 66]. Hillingdon follows closely as the third least densely populated, with 2,644 people per km². In contrast, Hounslow has a higher population density of 5,147 people per km², while Brent has 7,860 people per

km², Ealing has 6,612 people per km², and Harrow has 5,176 people per km² **[See reference 67]**.

Table 3.10: Population change in the WLWP area from 2011- 2021

Area	2011 Census	2021 Census	Percentage Change
Brent	311,200	339,800	9.2% increase
Ealing	338,400	367,100	8.5% increase
Harrow	239,100	261,200	9.2% increase
Hounslow	254,000	288,200	13.5% increase
Hillingdon	273,900	305,900	11.7% increase
Richmond upon Thames	187,000	195,300	4.4% increase
Total	1,603,600	1,757,500	9.6% increase

3.56 In relation to the Old Oak and Park Royal Development Corporation (OPDC) which covers parts of the London Boroughs of Hammersmith and Fulham, Ealing, and Brent, the most recent population of the OPDC itself is 12,784 as of 2020, marking a 19% increase from 10,699 people in 2011 **[See reference 68]** **[See reference 69]**. This reflects the ongoing development and regeneration of the area as it transforms into a new urban district with new housing, infrastructure, and amenities.

3.57 Each of the boroughs' populations have grown over the last decade, and it is predicted that each of the boroughs' populations will continue to grow. The London Plan predicts that the population of London is projected to increase by 70,000 every year, reaching 10.8 million in 2041, and West London will play a large role in providing for this growth **[See reference 70]**. The London Plan also states that over a fifth of London's population is under 16, but over the coming decades the number of Londoners aged 65 or over is projected to increase by 90%. This is reflected in the high growth of those that are over 65 in each borough over the past decade, and it is predicted that this trend will continue.

3.58 As the population grows so do the boroughs' respective population densities. On average, the six Boroughs of West London, excluding the local planning authority of the OPDC have a lower population density (5,140 people per km²) than the London average of 5,690 people per km² [See reference 71]. The greater the population density the greater the challenge to ensure that each boroughs' communities have the quality of life, facilities and services and infrastructure they need, including public and private open space. However, increased population density can have both positive and negative effects in sustainable development terms, depending upon how new development is designed and delivered.

Housing

3.59 The housing targets in the London Plan (2021) for the period 2019/20 to 2028/29 are based on the 2017 London Strategic Housing Land Availability Assessment (SHLAA) [See reference 72]. These targets include Brent (23,250), Ealing (21,570), Harrow (8,020), Hounslow (17,820), Hillingdon (10,830), Richmond (4,110), and the OPDC (13,670).

3.60 The GLA's residential completions dashboard demonstrates that London is falling behind its housing completion targets. As a whole, London has failed to reach its housing delivery targets for the last seven years, although delivery did reach 120% in 2015/16. Since then, the average percentage of completions of target across London is 90%. The year 2023/24 achieved just 62% of its target to 52,297 homes [See reference 73].

3.61 To date, Brent has achieved 10,500 completions since 2019/20, Ealing has achieved 6,566, Harrow has achieved 4,145, Hounslow has achieved 6,715, Hillingdon has achieved 4,996, Richmond upon Thames has achieved 868, and the OPDC has achieved 2,854 [See reference 74], although it should be noted that 7,789 homes have been approved and over 4,300 homes have been completed since the inception of the OPDC in 2015 [See reference 75]. None of the six Boroughs, including the planning authority OPDC, have achieved their target housing delivery goal for over five years, although this can partly be attributed to the COVID-19 pandemic and wider changes in the economic landscape of the built environment.

3.62 Through the changes to the NPPF in December 2024, the government has set out new national requirements for the number of homes to be delivered across England. Over the ten-year period of the next London Plan, the government has said the housing need in London is 880,000 new homes, which is over double the current rate of housebuilding across London [See reference

76] Delivering the required new homes across London will contribute to construction, demolition and excavation waste arisings, along with increases in household waste to be managed.

Health

3.63 Health is a cross-cutting topic and as such many topic areas explored in this Scoping Report influence health either directly or indirectly.

3.64 The Office of National Statistics (ONS) have created an index that gives every local area in England an overall health score for each of the past six years. This overall score is made up of measures in different categories, called domains and subdomains. These measures include physical and mental health conditions like diabetes or anxiety, local unemployment, road safety, and behaviours like healthy eating [**See reference 77**].

3.65 This score can show whether health in a local area is improving. The Health Index score has a baseline of 100, which represents England's health in 2015. A score higher than 100 means that an area has better health for that measure than was average in 2015, lower than 100 means worse health than the 2015 average. In 2021, the six West London Boroughs scores were as follows:

- Brent – 101.8
- Ealing – 107.0
- Harrow – 110.1
- Hounslow – 101.1
- Hillingdon – 103.2
- Richmond upon Thames – 118.6

3.66 Data is not available regarding the Health Index score in relation to the Old Oak and Park Royal Development Corporation area.

Waste crime

3.67 Waste crime encompasses fly-tipping, illegal waste sites, illegal waste exports, the misdescription of waste and illegal waste dumping, among other illegal waste-related activities. If not handled properly, waste can cause serious pollution of the environment – air, land and water, which can also be harmful to

health. Waste crime also reduces the availability of resources from waste that could otherwise be recovered and reused.

3.68 Current data reported for the 25 Year Environment Plan include illegal waste sites and fly-tipping. The reporting on the indicator J6 on Waste Crime shows the total number of illegal waste sites in England has risen and fallen between a highest number of 1,011 active sites in 2011/2012 year to 556 in 2013/2014, reaching 685 sites in 2018/2019, before falling again to 344 sites in 2023/2024. The total number of fly-tipping incidents reported in England in 2018/2019 was 957,000. In the 5 years to 2023/2024, this total increased by 20.4% to 1.15 million incidents. [\[See reference 78\]](#).

3.69 In the WLWP authority areas, the number of fly-tipping incidents reported is shown in Table 3.11, with a total of 98,241, which is approximately 22% of the total number for London (444,519). Brent and Hounslow reported the most incidents with about 27,000 (or 6% of the London total) each [\[See reference 79\]](#).

Table 3.11: Fly-tipping incidents reported by local authorities in WLWP area 2012/2023/24

Borough	Number of fly-tipping incidents
Brent	27,023
Ealing	16,828
Harrow	12,609
Hillingdon	10,099
Hounslow	27,241
Richmond upon Thames	4,441

Deprivation

3.70 Poverty impacts upon entire families and has significant impacts on health, education, skills and life chances. Efforts to lift people out of poverty is a challenge, especially as it is linked to so many other factors such as income

levels, cost of living and family size. It has also been observed that many communities experiencing more waste crime are often the most economically and socially disadvantaged [See reference 80]. The Indices of Multiple Deprivation (IMD) 2019 [See reference 81] provide comparison data down to the postcode level. **Figure 3.2** at the end of this chapter shows the IMD data across the WLWP area, which shows there are disparities in the level of deprivation across all seven authorities and within each authority (at the Lower Super Output Area level). A summary is provided below for each LPA:

- Brent is 1.11 times more income-deprived than the average in London. Compared to the rest of England, Brent is 1.46 times more income-deprived, indicating that the borough experiences greater income deprivation than the national average [See reference 82]. The local authority area ranked 49th out of 317 local authorities in 2019, placing it within the 15% most income-deprived local authorities in England.
- In Ealing, the income deprivation rate is equivalent to the London average, although is 1.32 times more income-deprived than the average in the rest of England. The local authority area ranked 88th out of 317 local authorities in 2019, placing it within the 30% most income-deprived local authorities in England.
- Harrow is on average less income-deprived in comparison to London, with a relative deprivation ratio of 0.82, although is 1.08 times more income-deprived than the average in the rest of England. The local authority area ranked 199th out of 317 local authorities in 2019, placing it within the 40% most income-deprived local authorities in England.
- Hounslow is on average less income-deprived in comparison to London as a whole, with a relative deprivation ratio of 0.96, although the local authority is 1.26 times more income-deprived than the average in the rest of England. The local authority area ranked 95th out of 317 local authorities in 2019, placing it within the 30% most income-deprived local authorities in England.
- Hillingdon is on average less income-deprived in comparison to London, with a relative deprivation ratio of 0.85, although the local authority is 1.12 times more income-deprived than the average in the rest of England. The local authority area ranked 151st out of 317 local authorities in 2019, placing it within the 47% most income-deprived local authorities in England.
- Richmond upon Thames is on average the least income-deprived in comparison to London, with a relative deprivation ration of 0.5, and also

less income-deprived (0.66) than the average in the rest of England. The local authority area ranked 297th out of 317 local authorities in 2019, placing it within the 10% least income-deprived local authorities in England.

- Within the OPDC area, deprivation levels are high, with the IMD in 2015 ranking it among the top 20% of the most deprived areas in London [See reference 83]. OPDC's more immediate context contains some of the most deprived areas in the country. Locations such as Harlesden and Stonebridge are ranked within the top 10% most deprived wards nationally and have issues with income deprivation and health [See reference 84].

Equalities

3.71 The Equality Act 2010 identifies nine 'protected characteristics' and seeks to protect people from discrimination based on these characteristics. It presents three main duties: to eliminate discrimination, harassment, victimisation and other conduct that is prohibited under the Act; to advance equality of opportunity and to foster good relations between persons who share relevant protected characteristics and persons who do not share it. The nine protected characteristics identified through the Act are:

- Age: Children (0-4), Younger people (aged 16-24), older people (aged 65 and over);
- Disability: Disabled people, people with physical and mental impairment;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief;
- Sex; and
- Sexual orientation.

3.72 Data regarding the population groups including these protected characteristics is collected through the 2021 UK Census [See reference 85]. In summary, the data suggests that in general, West London has a younger than the London average population, greater ethnic and religious diversity, a slightly higher marriage and total fertility rate and similar percentages of males and

females. One of the boroughs, Brent, has the second-highest proportion of adults identifying as transgender in England and Wales, while Richmond upon Thames has the second smallest proportion of adults identifying as transgender in London. Apart from the age population trends, it is difficult to predict how rates within these other population groups may change in the future.

Population and health key issues and evolution without the WLWP

3.73 Across the WLWP authorities, population is forecast to increase, with younger (0 to 15) and older (over 65) groups seeing the largest increase. In the absence of any significant reduction in per capita resource consumption, the consequence of population growth will be an increase in the amount of waste being generated. The WLWP will provide opportunities to ensure that the existing network of waste management facilities can keep pace with demand for waste management services.

3.74 Associated with the growing population, the need for new houses to be delivered will continue, along with the challenges of under delivery of housing targets. Competition for land to develop housing can impact on the ability to deliver waste facilities, hence the importance of the WLWP for safeguarding existing facilities and enabling modernisation and expansion where appropriate. This should also help to contribute to reducing illegal fly-tipping, which is highest in Hounslow and Brent. However, the role of the WLWP is limited compared to other initiatives such as the WLWP authorities' ability to fine those caught fly-tipping, and the Environment Agency's fight against waste crime **[See reference 86]**.

3.75 Levels of deprivation and percentages of different population groups subject to the Equalities Act are influenced by many variables and are unlikely to change with or without the WLWP, although there can be challenges with increasing participation in household waste recycling schemes where there are large proportions of people with limited English within communities. The GLA and each of the authorities have strategies to address inequalities over time but there are uncertainties if current trends will continue over time.

Economy

Economy and employment

3.76 London is an international city which has established itself as a major centre of economic activity. As measured by Gross Value Added (GVA), London's total economic output was worth around £364 billion in 2014, 6.8% higher than in 2013. In 2014, London accounted for 22.5% of the UK's total GVA, up from 18.9% in 1997 **[See reference 87]**.

3.77 Between 1971 and 2015, the total number of jobs in London has increased by almost one million. The professional, scientific and technical activities sector accounts for the largest number of jobs, at 755,000 (or 14%). Compared to the wider UK, London is specialised (in terms of jobs) in both the information and communications sector and the financial and insurance activities sector. This sector is the largest in London, generating £68.7 billion of GVA and accounting for 18.9% of London's total economic output. Within these broad sectors there are a large number of significant subsectors of particular specialisation within London. In addition to this specialisation, there are significant levels of employment in a number of broad sectors – making for quite a diverse economic structure. The spatial make-up of London's economy shows that different sectors are important to different boroughs. The financial and insurance activities sector accounts for 66.6% of total output in the City of London; whereas Hillingdon has the greatest proportional share of the distribution, transport, accommodation and food sector, accounting for 39.7% of output. Brent has the greatest proportional share of the production industries, accounting for 13.4% of total output. Harrow has the greatest proportional share of local authority output, construction, accounting for 8.3% within London **[See reference 88]**.

3.78 In Brent, Harrow, Hillingdon and Hounslow, the largest percentage of residents aged 16 and over (28.1, 30.7%, 38.8, and 24.9% respectively) are employed in the public administration, education and health sector. In Ealing and Richmond upon Thames, the largest employment sector is banking, finance and insurance, employing 35.7% and 32% respectively **[See reference 89]**. In the OPDC area, the most prevalent occupational group is professional occupations (20%) **[See reference 90]**. It is uncertain how much the waste management sector contributes to employment within West London.

3.79 Across London in the year ending December 2023, 74.6% of people aged 16 to 64 years were employed. This means that Harrow, Hillingdon and Brent

are below the London average, with 73.4%, 68.2% and 67.7% respectively while Hounslow, Ealing, Richmond upon Thames and OPDC are above the London average, with 81.2%, 79.4%, 78.5% and 81% respectively. Across London in the year ending December 2023, 5% of people aged 16 to 64 years were unemployed. This means that Hillingdon (7%), Brent (5.7%) and OPDC (6.3%) have a higher unemployment rate than the London average. Harrow (4.7%), Richmond upon Thames (4.5%), Ealing (4.9%) and Hounslow (4.4%) all have lower unemployment rates than the London average [\[See reference 91\]](#) [\[See reference 92\]](#).

Growth Areas

3.80 The Inclusive Growth Strategy (IGS) for Brent 2019-2040 is a long-term strategy that identifies choices available to meet the challenges and seize the opportunities of growth over the next 20 years [\[See reference 93\]](#). The Brent Local Plan (2019) which was adopted in February 2022 [\[See reference 94\]](#) identifies the following areas for economic growth for the period between 2019 and 2041:

- Wembley
- Neasden Stations
- Staples Corner
- Burnt Oak and Colindale
- Northwick Park
- Church End
- South Kilburn
- Alperton

3.81 Ealing has one of the largest concentrations of industrial floorspace in London, with large areas of Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS). With some of the UK's biggest infrastructure hubs on its doorstep, including Heathrow and Old Oak Common, Ealing offers increased opportunities for economic and investment growth to build on the development of High Speed 2 and the new Elizabeth Line stations [\[See reference 95\]](#). The adopted Local Plan sets out how historic growth has been focussed on Acton, Ealing, and Southall, and the new Local Plan will seek to balance future investment across the whole Borough, including Hanwell, Greenford, Northolt and Perivale. Southall has been designated an Opportunity

Area within the London Plan (2021) and is entirely within Ealing. Old Oak Common and Park Royal Estate is partly within Ealing and falls under the responsibility of the OPDC.

3.82 Harrow's Local Plan 2021-2041 [See reference 96] incorporates the concept of 'Good Growth,' which underpins the London Plan. This is focussed on ensuring that future growth within London and its boroughs is socially and economically inclusive and environmentally sustainable. The Harrow Local Plan seeks to direct much of that development to the most sustainable and central locations such as the Harrow and Wealdstone Opportunity Area, designated in the London Plan 2021.

3.83 The Hillingdon Local Plan Part 2 Development Management Policies and Site Allocations and Designations were adopted as part of the Borough's development plan in January 2020. The Site Allocations and Designations Document [See reference 97] identifies key growth areas in the Borough, noting the inclusion of the Heathrow Opportunity Area and Hayes Opportunity Area which is consistent the London Plan (2021):

- Uxbridge
- Heathrow Airport
- Heathrow Opportunity Area
- Hayes/West Drayton
- Hayes Housing Zone/ Opportunity Area

3.84 In 2024 Hounslow Council launched 'Opportunity Hounslow, Gateway to London and the world' [See reference 98] setting out the Borough's aspirations for Hounslow, Chiswick, Brentford and Feltham. The Hounslow Local Plan 2015-2030 [See reference 99] notes that the Great West Corridor plays a greater than sub-regional role in the digital and media sector and will be one of the main areas of focus for economic development within the borough. The Hounslow Local Plan also identifies the Heathrow Opportunity Area (shared with London Borough of Hillingdon) as an area to accommodate significant new housing and employment growth (particularly related to logistics and warehousing).

3.85 The London Borough of Richmond upon Thames Regulation 19 Local Plan (2023) [See reference 100] seeks to direct development and growth to town centres: Richmond, Twickenham, Teddington, Whitton and East Sheen. The Local Plan notes that there is a large shortfall in industrial and office floorspace with very few opportunities to identify additional land to meet demands, due to

the historic environment in the Borough and the large number of protected open spaces.

3.86 The Old Oak and Park Royal Development Corporation (OPDC) is securing the regeneration of the Old Oak and Park Royal Opportunity area, spanning land in three London boroughs: Ealing, Brent and Hammersmith & Fulham [See reference 101]. OPDC's Local Plan was adopted in 2022, sets out the development framework for the area. OPDC is now developing plans for Old Oak on land surrounding Old Oak Common Station, Willesden Junction and North Acton, to create an urban district.

Implications for health

3.87 Employment and job security influence mental health and levels of stress. Income can also influence physical health, in terms of the quality and location of housing that people can afford. A strong local economy will help create more job opportunities, contribute to greater job stability and raise the quality of life for local people, resulting in improved health outcomes.

Economy key issues and evolution without the WLWP

3.88 Beneficial economic characteristics have not been equally shared across the communities within the seven WLWP authorities. The consequence for this has been levels of local inequality, including areas such as Yeats Close and Iron Bridge Close in Brent, and areas within the wards Townfield, Botwell, and Yeading in Hillingdon falling within the 10% more deprived Lower Super Output Areas in England. It is also reflected in Hillingdon and Brent having a higher unemployment rate than the London average.

3.89 The WLWP could contribute in a small way towards improving the diversity and quality of local employment opportunities available and potentially investment in training in more deprived urban localities, through encouraging protection, modernisation and possible expansion of existing waste facilities.

Transport

3.90 Although there are no specific data sources for vehicle movements associated with waste development within West London, they are likely to be smaller than other for activities (such as commuting, shopping, leisure), and include not only the transport of waste itself from collection points to waste

management facilities (either by householders or waste collection companies), but also commuting to and from work by waste facility employees.

3.91 The London Infrastructure Plan 2050: Transport Supporting Paper [\[See reference 102\]](#) notes that across London, trip rates are expected to remain constant on a per person basis, but that expected growth in population will require significant additional capacity across London's transport networks by 2050.

- **Brent:** The Brent Long Term Transport Strategy 2015-2035 [\[See reference 103\]](#) aspires to provide a transport network which supports economic development and works to improve safety, accessibility and inclusivity in the borough whilst also mitigating, where possible, the negative impact of traffic growth.
- **Ealing:** The transport strategy and local implementation plan (LIP) set the Borough's transport priorities. It builds on the transport strategy which aims to improve the quality of life in the borough. The three plans covering cycling, parking and school travel set out the Borough's policies, projects and targets in more detail. [\[See reference 104\]](#)
- **Harrow:** The Draft Long Term Transport Strategy [\[See reference 105\]](#) has been developed to guide the future delivery of sustainable transport schemes by the Borough. The Strategy sets out the vision for transport, the priority areas based on a robust evidence base, and an action plan of measures to help achieve the key objectives.
- **Hounslow:** The third Hounslow Local Implementation Plan (2018) [\[See reference 106\]](#) describes how the council will implement the Mayor's policies and proposals on a local level whilst responding to the unique challenges and opportunities present in the borough. The overarching aim of the strategy is for 80% of all trips in London to be made on foot, by cycle or using public transport by 2041.
- **Hillingdon:** The third Local Implementation Plan (2019) [\[See reference 107\]](#) transport policies, programme and long-term aspirations address demands on the existing transport network to not only maintain the existing network but improve mobility and access to employment, retail and leisure opportunities. The target for Hillingdon is for 56% of all trips to be made on foot, by cycle or using public transport by 2041 in the Borough.
- **Richmond upon Thames:** The Local Implementation Plan [\[See reference 108\]](#) focused on the headline target for 75% of trips to be undertaken by sustainable modes (walking, cycling and public transport)

by 2041, from a baseline of 61%. This target is supported by nine additional outcomes, covering three areas: healthy streets and active travel, a better public transport experience, and good growth.

- **Old Oak and Park Royal Development Corporation:** Given the significant growth at Old Oak, The Old Oak Strategic Transport Study (2016) [See reference 109] has three main interrelated tenets to enable the enable the maximum development and regeneration potential to be fulfilled:
 - Minimise highway congestion;
 - Address the significant severance; and
 - Maximise the potential of the proposed new HS2/Crossrail interchange

3.92 Figure 3.3 at the end of this chapter illustrates the main road, rail and cycling routes in the WLWP Area. Key highway routes within the WLWP area are subject to congestion during peak periods, not only in terms of absolute delays but also the unreliability of journey times.

3.93 At the time of Census 2021, UK government guidance and lockdown restrictions resulted in unprecedented changes to travel behaviour and patterns, with between one third and just over one half of residents working from home in 2021 in all five West London boroughs other than Brent (which had 14%). [See reference 110]. The Census data also showed higher percentages of car use over public transport in all of the boroughs.

Implications for health

3.94 A lack of sustainable and active travel options can have negative impacts on public health whilst also increasing reliance on relatively expensive private motorised transit and exacerbating existing inequalities. Encouraging active travel, such as walking, wheeling and cycling can have a wide range of positive implications for health, including increased physical activity and opportunities for social interaction. In addition, an increase in active travel could be associated with a decrease in reliance on often expensive vehicular transport, and an associated decrease in air pollutants that can be harmful to human health.

Transport key issues and evolution without the WLWP

3.95 Adverse traffic conditions on key highway routes within the WLWP area can have knock-on effects on local roads, leading to localised gridlock on

occasion and impacting negatively on economic productivity. In addition, with planned developments and increased housing and job provision, more pressure may be placed on the road networks.

3.96 Although the traffic movements associated with waste development may be smaller than other activities, without the WLWP it is anticipated that traffic congestion and air and noise pollution from transport associated with waste developments could continue to increase. The implications of air pollution for human health and the natural environment are described in subsequent sections.

3.97 The WLWP provides an opportunity to reduce the demand on the transport network from waste development and to address potential adverse effects of travel by:

- Supporting and prioritising sustainable travel choices through workplace travel plans; and
- Supporting the uptake of electric vehicles through the provision of electric vehicle charging infrastructure at waste sites.

Historic environment

3.98 The historic environment can be considered a finite resource. It cannot be replaced and is susceptible to decline over time as historic features experience degradation and decay. However, cultural heritage can evolve and change, and features which are not currently considered a valued part of the historic environment may become so in the future, either due to their uniqueness, past use, or historic or cultural significance.

3.99 At the local level, new, expanded or re-developments, infrastructure and environmental pressures, such as extreme weather and flooding, present the greatest risk to cultural heritage assets.

3.100 Historic England has a Heritage at Risk Register **[See reference 111]** which includes historic buildings, listed buildings, sites and Conservation Areas at risk of being lost through neglect, deterioration or decay. The register aims to highlight those places and buildings in greatest need of repair. As of 2024, there are 81 heritage assets registered as at risk within wider London. There are ten heritage assets registered at risk within Brent, 16 within Ealing and Harrow respectively, 31 in Hounslow, 50 in Hillingdon, 17 in Richmond upon Thames, and none in OPDC.

3.101 Figures 3.4a to 3.4f at the end of this chapter illustrate the historic environment assets for each of the boroughs as described below.

Brent

3.102 The adopted 2022 Brent Local Plan 2019 – 2041 [\[See reference 112\]](#) notes the importance of conserving and enhancing heritage and cultural assets as the borough continues to grow. As compared to many inner London boroughs, Brent has relatively few designated heritage assets, largely due to its significant development during the interwar period. The borough has:

- Just over 200 nationally listed buildings, a small number of archaeological sites and 22 Conservation Areas, which cover approximately 7% of the borough.
- Important cultural and heritage assets, which include the Grade I listed Old Parish Church of St Andrew and Grade II listed Sudbury Town Underground station, Oxgate Farm, and Wembley Arena along with a number of historic churches and areas of statutory listed land. , .
- Brent’s cultural diversity is reflected in its notable places of worship, including the BAPS Shri Swaminarayan Mandir in Neasden and the Shree Sanatan Hindu Mandir on Ealing Road. While it has cultural landmarks and a vibrant nightlife in Wembley and Kilburn, its 2020 London Borough of Culture status was awarded primarily for its people and activities. However, cultural and creative spaces face significant financial challenges, difficulties finding new sites together with potential displacement from competing higher value land uses.
- There are ten buildings on the Buildings at Risk Register, of which three are churches [\[See reference 113\]](#).
- There are four Archaeological Priority Areas and 40 Sites of Archaeological Importance in Brent. [\[See reference 114\]](#).

Ealing

3.103 The Regulation 19 Submission Local Plan for Ealing highlights the importance of placemaking, good growth, and good design to protect and enhance heritage assets, maximising their cultural, social, and economic benefits [\[See reference 115\]](#). The borough contains a wealth of designated heritage assets, including:

- Over 300 listed buildings and structures.
- There are six Scheduled Monuments, four Registered Parks and Gardens and 29 Conservation Areas **[See reference 116]**.
- There are over 700 non-designated heritage assets identified in Ealing's local heritage register.
- Five of Ealing's Conservation Areas are currently on Historic England's Heritage at Risk Register due to the deterioration of certain areas **[See reference 117]**. These are:
 - Acton Town Centre is currently listed with its Condition being classed as 'Fair', Vulnerability as 'Medium', and Trend as 'Deteriorating.'
 - Cuckoo Estate is currently listed with its Condition described as 'Poor', Vulnerability as 'Medium' and Trend as 'Deteriorating'.
 - Ealing Town Centre is currently listed its Condition being classed as 'Fair, Vulnerability as 'Medium' and Trend as 'No significant Change'.
 - Haven Green is currently listed with its Condition being classed as 'Fair', Vulnerability as 'Medium' and Trend as 'Deteriorating.'
 - Norwood Green is currently identified in Historic England's Heritage at Risk Register with its condition described as 'Very Bad', Vulnerability as 'Medium' and Trend as 'Deteriorating Significantly'.
- There are 23 Archaeological Priority Areas spread across the borough, which include Mill Hill Estate, Down Barns, and Manor Farm Road **[See reference 118]**.

Harrow

3.104 The Regulation 19 Submission Local Plan for Harrow 2021 – 2041 looks to integrate heritage growth to ensure that development respects and enhances historic character **[See reference 119]**. The Plan also seeks to safeguard listed buildings and locally significant heritage sites from inappropriate alterations or demolitions. The borough contains a wide variety of designated and undesignated heritage assets, which make a vital contribution to the local character of the borough:

- There are over 300 listed buildings in the borough, as well as four Registered Parks and Gardens, nine Scheduled Ancient Monuments, and 30 Conservation Areas.

- There are nine Archaeological Priority Areas in the borough **[See reference 120]**.

Hounslow

3.105 The Regulation 19 proposed submission of the Hounslow Local Plan 2020 – 2041 **[See reference 121]** notes the importance of protecting and enhancing natural and built heritage assets, and the distinctive established residential characters found across the borough. The rich and varied heritage of the borough include many important designated heritage assets:

- There are over 500 statutorily listed properties, both commercial and domestic.
- The borough also contains some of West London’s remaining Great Estates at Chiswick, Gunnersbury, Boston Manor, Osterley and Syon, a unique and distinct aspect of the borough which contributes significantly to the environmental and cultural wealth of the borough.
- There are 28 Conservation Areas in the borough, which are mostly concentrated in the east of the borough, specifically in Chiswick, Brentford and Isleworth.
- The 2023 London Borough of Hounslow Archaeological Priority Areas (APA) appraisal **[See reference 122]** found a total of 28 Archaeological Priority Areas. This includes five Tier 1 APAs, twenty-one Tier 2 APAs and two Tier 3 APAs.
- **Hounslow is home to 6 Scheduled Monuments, mostly located in the west of the borough.**
- **Hounslow maintains a Local List of non-designated heritage assets.**

Hillingdon

3.106 The Local Plan Part 1 sets out the Borough’s long-term spatial strategy, including policies on heritage conservation. With regard to heritage assets, including open spaces and historic buildings, which make an important contribution to our local identity, are safeguarded and enhanced in the Local Plan. Hillingdon contains:

- 409 statutory listed buildings, and 302 locally listed buildings. The borough also has five Scheduled Monuments. Among its notable heritage assets is Church Gardens in Harefield, a Grade II listed entry in the English

Heritage Register of Historic Parks and Gardens. Furthermore, the borough enforces an Article 4 Direction at Daisy Cottages, West Drayton Green, providing extra protection to this historically significant site.

- There are 31 Conservation Areas, and 14 Areas of Special Local Character (ASLC) in the borough.
- There are 22 Archaeological Priority Areas within the borough of Hillingdon **[See reference 123]**.

Richmond upon Thames

3.107 The Regulation 19 Submission Local Plan for Richmond upon Thames **[See reference 124]** notes the importance of protecting and enhancing key heritage assets, which contribute significantly to the distinctive character of the borough. The borough contains:

- Over 300 heritage assets across the borough.
- The borough comprises several wards with varying numbers of listed structures. For instance, South Richmond Ward has 181 listed buildings, whilst Kew Ward contains 84 listed buildings. Notably, the Royal Botanic Gardens, Kew, located within the borough, is one of only four World Heritage Sites in Greater London, further highlighting Richmond's historical and cultural significance.
- There are 85 Conservation Areas within the borough **[See reference 125]**.
- The 2023 London Borough of Richmond upon Thames Archaeological Priority Areas (APA) appraisal found a total of 31 Archaeological Priority Areas for Richmond, of which 7 are a Tier 1 APA, 24 are Tier 2 APAs, and 1 is a Tier 3 APA **[See reference 126]**.

Old Oak and Park Royal Development Corporation

3.108 The Old Oak and Park Royal Development Corporation Local Plan **[See reference 127]** recognises the area's rich social, cultural, and built heritage, shaped by its transformation from a rural landscape to an industrial hub. Heritage assets, both designated and non-designated, play a key role in placemaking and delivering social, economic, and environmental benefits. Key designated assets within or in close proximity to the OPDC include **[See reference 128]**:

- The Grand Union Canal, which runs through the Boroughs of Ealing, and Hammersmith & Fulham. These areas of the canal within the boroughs are designated Conservation Areas.
- Kensal Green Cemetery, a designated Conservation Area and Registered Park and Garden.
- St Mary's Catholic Cemetery, a designated Conservation Area.
- Kensal House and Day Nursery, which are both Grade II* listed.

3.109 On 27th February 2017 the OPDC designated the Cumberland Park Factory Conservation Area on Scrubs Lane [\[See reference 129\]](#).

3.110 It should be noted that the OPDC is not responsible for the adjacent St. Mary's Conservation Area and Kensal Green Cemetery Grade I Listed Registered Park and Garden. However, they contain a number of heritage assets which are identified by Historic England to be at risk.

3.111 On 20th January 2020, OPDC adopted its Local Heritage Listings which identified 64 non-designated heritage assets [\[See reference 130\]](#).

3.112 There are no known archaeological designations within Old Oak and Park Royal.

Implications for health

3.113 Historic England explored the links between the historic environment and health in Wellbeing and the Historic Environment [\[See reference 131\]](#). This identified mental and social wellbeing benefits of the historic environment, including opportunities to meet people and expand knowledge through volunteering or visiting historic sites and giving people a sense of place, community and belonging.

Historic environment key issues and evolution without the WLWP

3.114 There are many designated and undesignated heritage assets and areas of historical and cultural interest in the WLWP area that could be adversely affected by climate change and poorly located or designed development. While several of the historic assets in the plan area, for example listed buildings and Scheduled Monuments, will continue to be protected by statutory designations, without the WLWP it is possible that these, and undesignated assets, will be

adversely affected by inappropriate waste development. The WLWP provides an opportunity to protect these assets (including their settings) from inappropriate waste development, through criteria in its policies.

3.115 Although there is a high level of protection afforded historic sites within the NPPF and NPPW, more of an emphasis could be placed within the WLWP on requiring any waste redevelopments to be designed and built so as to minimise adverse effects on the county's historic environment above and below ground.

Landscape and townscape

3.116 The National Character Map defines the WLWP area as lying within National Character Areas 111 – Northern Thames Basin and 115 – Thames Valley [**See reference 132**].

3.117 The Northern Thames Basin area is a diverse mix of urban and rural landscapes. The rural and dispersed landscape adjacent to Essex becomes increasingly urban towards the centre of London. There is a mix of historic settlement patterns, with remnants of historical orchards and other communal green and farmed spaces. Urban areas have low levels of tranquillity with pockets of perceived tranquillity. Moving westwards in the WLWP area, the landscape transitions to a more varied mix of suburban and rural areas. As it extends further, the built environment gradually gives way to larger green spaces, farmland, and historic market towns. Furthermore, tranquillity increases as green space and Green Belt areas increase.

3.118 The Thames Valley area is mainly a low-lying area, widening from Reading, which includes Slough, Windsor, the Colne Valley and the southwest London fringes. The River Thames provides a unifying feature through a very diverse landscape of urban and suburban settlements, infrastructure networks, fragmented agricultural land, historic parks, commons, woodland, reservoirs and extensive minerals workings. Towards London in the east, urban influences increasingly dominate the landscape, replacing the natural character of the area. This includes a dense network of roads (including the M25 corridor), Heathrow Airport, railway lines, golf courses, pylon lines, reservoirs, extensive mineral extraction and numerous flooded gravel pits. To the south, the open Thames flood plain dominates, with its associated flat grazing land, becoming characterised by a number of formal historic landscapes on higher ground. Between Hampton and Kew, the River Thames forms the focus of a series of designed landscapes.

3.119 Within the **Northern Thames Basin NCA**, drivers for change include:

- Continued urban expansion of settlements putting pressure on their landscape setting;
- Provision of new open space to improve health and wellbeing, which could lead to habitat fragmentation and an altered landscape character;
- Increased development of infrastructure (transport, logistics and industrial);
- Continued demand for minerals;
- Climate change will lead to increased wind erosion in hotter and drier periods and water erosion in the wetter, colder periods;
- Loss of brownfield sites in developed areas putting pressure on invertebrate habitats; and
- Decreased water availability with potential loss of specific drought intolerant species and water quality of water bodies.

3.120 Within the **Thames Valley NCA**, drivers for change include:

- Climate change will lead to increased wind erosion in hotter and drier periods and water erosion in the wetter, colder periods;
- The Thames Barrier is currently effective but may become unsustainable. Climate change could increase peak river flows by 20% and fluvial flows at Teddington by up to 40% by 2080;
- Drier summers and increasing temperatures, in relation to climate change, could lead to deterioration in the area's semi-natural wetland habitats, including ancient wet meadows and could also lead to lower river flows and increased demand for water resources;
- Continued urban expansion of settlements putting pressure on their landscape setting;
- Designed parkland features at risk from changing agricultural activities, development pressure and lack of management for individual trees;
- Increased development of infrastructure (transport, logistics and industrial) contributing to the overall fragmentation of the landscape;
- Continued demand for recreation opportunities from those living in the more urban parts of the NCA and Inner London, which could lead to habitat fragmentation and an altered landscape character.

3.121 The urban landscapes can be conserved by maintaining green spaces, landscaping and trees and implementing good design practices in new developments. Maintaining the rural landscape and natural landforms will be dependent on being able to preserve and conserve ancient woodlands, unimproved grasslands, protected lanes, commons and hedge-rowed field patterns, as well as the ridges and hilltops from inappropriately located or designed development, changing agricultural practices and seasonal climate change.

Implications for health

3.122 The landscape can benefit mental health and wellbeing in providing a pleasant setting and identifying and enhancing local landscape contributes to sense of place and belonging. Sensitive landscape management can also improve social and physical health by encouraging physical recreation, including providing a pleasant environment for activities such as walking and cycling, providing good public access links and helping people to feel safe and confident in navigating landscapes.

Landscape and townscape key issues and evolution without the WLWP

3.123 West London's varied urban and more rural landscapes are vulnerable to adverse effects from urban intensification, increasing recreational pressures and seasonal climate change. The WLWP provides an opportunity to help to protect and enhance such areas by ensuring the design of any redevelopment waste facilities is sympathetic to the surrounding area.

Biodiversity and Geodiversity

3.124 Endangered species and habitats are protected through the compilation and delivery of Biodiversity Action Plans (BAPs) at national, regional and local levels. Priority Habitats and Species are regarded as the most important habitats and species that need to be conserved across the country.

3.125 At UK level, the publication of the State of Nature Report **[See reference 133]** provides an overview of the health of the country's wildlife and how human impacts are driving sweeping changes in the UK. It looks back over 50 years of monitoring to see how nature has changed since the 1970s, averaging a 13% decline in the average abundance of wildlife in the UK since the 1970s, with key

drivers for change being agricultural productivity, climate change and increasing average temperatures, urbanisation and hydrological changes. The report finds that on average, metrics suggest that decline in species abundance and distribution of species has continued in the UK throughout the most recent decade. These trends are likely to continue in the absence of concerted action.

3.126 Biodiversity net gain (BNG) is mandatory in England from February 2024 [See reference 134]. The NPPF emphasises that plans should identify and pursue opportunities for securing measurable net gains for biodiversity, and plans and decisions should minimise impacts and provide net gains for biodiversity. The statutory framework aims to ensure that developments will achieve at least a 10% gain in biodiversity value. The requirement will apply to most new planning applications within each borough, whether or not the requirement is captured within the adopted local plan.

3.127 The London Environment Strategy [See reference 135] includes policies and proposals that aim to ensure that more than half of London will be green by 2050 and the city's tree canopy cover increases by 10%. The Strategy aims to achieve this by:

- making it the first National Park City (achieved in 2019 [See reference 136]);
- working with others to expand and improve London's urban forest;
- highlighting the economic value of London's natural capital, and finding new ways to fund London's green infrastructure that recognise this value;
- providing guidance and support to help people manage and create habitats for wildlife and enhance London's biodiversity;
- making maps, data and research available to help others to make a case for and identify priorities for green infrastructure in their local area;
- including policies in the new London Plan to protect the green belt and our best wildlife habitats, and to ensure that new developments include enough urban greening; and,
- supporting communities and others to improve London's greenspaces and opportunities to enjoy nature through funding programmes.

3.128 The Strategy recognises that in the past, green spaces and biodiversity in London has deteriorated in size and quality and now faces many environmental challenges. One of the challenges identified is waste. The Strategy states that waste has a big impact on the biodiversity and the environment both locally and globally. Less than half of the 7m tonnes of waste that London's homes and

businesses produce each year is currently recycled, and landfill capacity is set to run out by 2026. Plastic packaging not only litters London streets, but often finds its way into waterways and oceans, releasing toxic chemicals before breaking down – a process that can take centuries. London needs to reduce, reuse and recycle more, to see waste as the valuable resource that it is, and to reduce London’s increasing waste bill as the city grows.

3.129 The WLWP authorities have a variety of national and locally designated nature conservation sites, as described below and illustrated on **Figure 3.5** at the end of this chapter.

Brent

3.130 There are a number of Grade I Sites of Importance for Nature Conservation (SINCs) of borough importance in Brent. These include Fryent Country Park, Brent Reservoir and Northwick Park and the Ducker Pool. There are also areas of Grade II SINC throughout the borough. Brent Reservoir (Welsh Harp), a nationally designated Site of Special Scientific Interest (SSSI), comprises 170 hectares of open water, marshes, trees and grassland, which provides a valuable habitat for wildlife. It is particularly significant for breeding wetland birds, notably great crested grebes, and supports a rich variety of marsh plant species. Although the SSSI is located on the border of the London Boroughs of Brent and Barnet, the majority of the site lies within Barnet [**See reference 137**]. The SSSI is currently assessed as being in a favourable condition. There are also three Local Nature Reserves including Fryent Country Park. [**See reference 138**].

Ealing

3.131 There are 10 Local Nature Reserves (LNR) in Ealing, of which eight are owned and managed by the borough:

- Blondin Nature Area
- Fox Wood
- Grove Farm
- Gunnersbury Triangle (London Wildlife Trust)
- Islip Manor Meadows
- Litten Nature Reserve

- Long Wood
- Northolt Manor
- Perivale Wood (The Selborne Society)
- Yeading Brook Meadows

3.132 Yeading Brook Meadows, Islip Manor Meadows, Perivale Wood, and Gunnersbury Triangle are also designated SINC of borough importance. Additionally, Horsenden Hill, another borough-important SINC in Ealing, and Regionally Important Geological and Geomorphological Site (RIGS), is recognised for its species-rich grassland meadows, ponds supporting Great Crested Newts, and areas of ancient woodland, whilst London's Canals, which cover boroughs including Brent, Ealing, Hillingdon, and Hounslow, support a variety of habitats, particularly in relation to West London, in and around the Brent River and Grand Union Canal. Due to their ecological significance, these waterways have been designated as a SINC of Metropolitan importance [See reference 139].

3.133 The Ealing Regulation 19 Submission Local Plan aims to establish a green link and wildlife corridor at the Ealing Common Deposit site, which would connect the Green Corridor/Piccadilly and District Line SINC. This initiative presents an opportunity to enhance biodiversity through tree planting and soft landscaping [See reference 140].

Harrow

3.134 There are 44 SINC in the Borough of Harrow, covering 803.6 hectares, or 15.9% of the borough. Five are of Metropolitan Importance, six are of Borough Grade 1 importance, 14 are of Borough Grade II importance and 19 are of Local importance. The Bentley Priory Nature Reserve is both a SINC and an LNR and comprises the Borough's only SSSI. There are four LNRs in the Harrow [See reference 141]:

- Bentley Priory (59.25 ha)
- Stanmore Common (49.2 ha)
- Stanmore Country Park (30.75 ha)
- Roxbourne Rough (5.2 ha)

Hounslow

3.135 Hounslow's Nature Recovery Action Plan (NRAP) 2023 – 2028 [See reference 142] outlines the wildlife designations in the borough. With regard to international and national designated sites, the Southwest London Waterbodies Special Protection Area (SPA) and Ramsar site includes Kempton Park Reservoir, which lies in the south-west of Hounslow. The reservoir is also designated as part of the Kempton Park Reservoirs SSSI. These designations reflect overwintering wildfowl population, which is particularly successful due to its limited public access. The SSSI is assessed as being in 'unfavourable recovering' condition owing to infestation of the invasive New Zealand pygmyweed.

3.136 The Sydon Park Tide Meadow SSSI is also located in the borough of Hounslow and is the last remaining section of the River Thames within Greater London which is unbanked. This means that the meadows flood twice daily with the tide. The SSSI is recorded to be in favourable condition.

3.137 There are 10 LNRs in Hounslow, totalling 163ha. The network of SINCs spans the borough but trends toward the habitats associated with the Thames, Crane and Brent corridors, the western boundary (including Bedfont Lakes to Kempton Park), around Osterley Park in the north and Syon Park in the south. There is a total of 74 SINC sites in Hounslow.

Hillingdon

3.138 Hillingdon is one of the most biodiverse boroughs in London. The borough has a diverse range of habitats, including woodlands, scrublands, grasslands, wetlands, rivers, gardens, and parklands. These varied environments support a vast range of species, both common and protected. Hillingdon has six SSSIs, of which two are in unfavourable condition. These are Fray's Farm Meadows SSSI, and Harefield Pit SSSI [See reference 143]. The borough is home to one National Nature Reserve, Ruislip Woods, which is the largest expanse of ancient, semi-natural woodland in Greater London.

3.139 In addition, Hillingdon boasts a range of other protected areas, including four Local Nature Reserves (LNRs), 13 other nature reserves, and 14 Sites of Metropolitan Importance designated for their ecological value across London. The borough also features 15 Sites of Borough Grade I Importance, 25 Sites of Borough Grade II Importance, and 7 Sites of Local Importance, all contributing to its rich natural heritage. Furthermore, Hillingdon includes three Sites of

Countryside Conservation Areas, reflecting a commitment to preserving local landscapes [\[See reference 144\]](#).

Richmond upon Thames

3.140 Richmond upon Thames is one of the richest boroughs in regard to the total area of green space, the quality and diversity of parks, open spaces, and conservation areas, as well as the wealth of different habitats and species these areas support, as many of the species are also important on a regional, national and international scale.

3.141 There are currently three SSSIs in the borough. These are Richmond Park SSSI, Bushy Park and Home Park SSSI, and WWT London Wetland Centre SSSI. All three of these SSSIs are in favourable condition [\[See reference 145\]](#).

3.142 Additionally, there are ten SINCs of metropolitan importance in the borough, which include Ham Lands, Barnes Common, and Royal Botanical Gardens (RBG) Kew. RBG Kew is also a designated World Heritage Site, reflecting its diverse historic landscape, and rich architectural legacy. The London Borough of Richmond upon Thames also contains 23 SINCs of local importance [\[See reference 146\]](#). The emerging Local Plan is taking forward the recommendations from the Review of Sites of Importance for Nature Conservation (2021 and 2022), which includes new SINCS, expansion areas or removing areas from existing SINCS, and changing the SINC status, as well as amalgamating and renaming existing SINCS.

3.143 The London Borough of Richmond upon Thames (LBR) is taking several key actions to enhance the Borough's biodiversity. LBR will collaborate with schools to promote the rewilding of playing fields, supporting initiatives like the Thames Landscape Strategy's Rewilding Arcadia project. It will also stop installing artificial grass at LBR facilities (except for sports areas) to preserve natural habitats. LBR plans to identify additional tree planting opportunities across the borough and launch a Tree Warden Scheme, encouraging the community to care for local trees. These efforts will help improve biodiversity by creating more natural spaces, supporting local ecosystems, and increasing green cover throughout Richmond [\[See reference 147\]](#).

Old Oak and Park Royal Development Corporation (OPDC)

3.144 SINC's within the OPDC area are designated under the OPDC Local Plan [See reference 148]. In total across the OPDC, there are 19 SINC's. This includes the Grand Union Canal, which is recognised as a SINC of Metropolitan Importance. Additionally, part of Wormwood Scrubs are designated as a LNR [See reference 149].

3.145 OPDC has recently delivered biodiversity improvements along the Grand Union Canal. This includes towpath clean ups, planting events, and maintenance events [See reference 150].

Implications for health

3.146 A strong link exists between access to nature and biodiversity and associated health and societal benefits. Considering the COVID-19 pandemic, the importance of safe, accessible and well-connected green and blue spaces for improving quality of life has also never been more pertinent.

3.147 According to the recently published World Health Organisation report 'Nature, Biodiversity and Health: An Overview of Interconnections' [See reference 151] increased exposure to nature has been associated with a lower risk of specific health conditions including depression, anxiety, cortisol, blood pressure, pre-term birth, low birthweight, type 2 diabetes, and reduced risk of death from all causes. There is generally positive evidence relating to the impacts of activities in natural environments on children's mental health and their cognitive, emotional and behavioural functioning. These health benefits are thought to arise through a range of pathways, including providing opportunities and safe spaces for physical activity, for restoration and relaxation, and for socialising with friends and family. Exposure to green and blue space is also associated with higher levels of life satisfaction. Impacts appear to differ according to socio-economic status and other demographic factors such as age or gender.

Biodiversity and geodiversity key issues and evolution without the WLWP

3.148 The WLWP area contains many areas of high ecological value ranging from nationally designated Sites of Special Scientific Interest, Sites of Metropolitan Nature Conservation Importance and Sites of Importance for Nature Conservation among local green spaces and networks that provide

ecological connectivity and greater biodiversity, and there is proximity to sites of national importance.

3.149 There is a need for continued preservation and long-term management of these areas within the plan area, as well as consideration of potential effects on sites outside the plan area boundary. The Brent Reservoir (Welsh Harp) SSSI, while in favourable condition, faces challenges related to water pollution and habitat degradation. SINCs across the boroughs require effective management to maintain quality and prevent degradation from traffic pollution and recreational activities. Without proactive conservation efforts, these sites could lose their ecological value, limiting the contribution they make to biodiversity, landscapes and the natural environment. Biodiversity harm can occur outside of protected areas, and local wildlife corridors should also be protected, appropriately within the hierarchy of types of designations.

3.150 Without the WLWP, important habitats and biodiversity sites will continue to receive statutory protection. However, the WLWP presents an opportunity to manage the sensitivities of the sites and biodiversity networks, for example by providing for biodiversity net-gain in any new or redeveloped waste management site.

Air, land and water quality

Soils and geology

3.151 Soil is a finite natural resource which regenerates only over extremely long geological timescales and provides many essential services including food production, water management and support for valuable biodiversity and ecosystems. It also plays a role in preventing climate change as a larger storer of carbon.

3.152 Although all seven of the local authorities comprising the WLWP area are within the large urban expanse of Greater London, there are still large areas of green space, although these are mostly in non-agricultural use. Natural England land classification maps for London and the Southeast **[See reference 152]** show that although most land is classified as 'land predominantly in urban use' there are pockets of Good to Moderate within the WLWP area.

3.153 Most of the WLWP area is considered brownfield or previously developed land (PDL). All seven of the local authority areas have a history of industrial

land use and potential for the discovery of contaminated land requiring mitigation in tandem with new development.

3.154 There are limited minerals deposits or mineral processing facilities within the WLWP area. National policy requires that mineral resources are safeguarded for future use [See reference 153]. The recycling of soils and construction wastes on development sites is one of the main ways that use of these resources is minimised in the WLWP area.

Water

3.155 Water consumption rates per household are still mainly composed of flushing toilets, washing clothes or taking a bath or shower. The London Plan 2021 [See reference 154] sets water efficiency standards for new development of 105 litres or less per person per day.

3.156 Figures from the Thames Water annual performance report (2021/22), indicated that daily water consumption in London was 144.4 litres per capita, down from 152.2 litres per capita in 2020/21, but still higher than their target of 142.6 litres per capita [See reference 155]. Data on water usage by the waste sector is not readily available.

3.157 Several water bodies across the seven local authority areas do not meet the required 'good' status, and a number of water bodies and watercourses are protected sites and sensitive to changes in water quality. In relation to Richmond upon Thames, water quality in the River Thames has not improved in recent years. Surveys indicate that while overall water quality has remained stable, 92% of samples contained significant levels of coliform bacteria. Additionally, in 1% of cases, dissolved oxygen levels dropped to critically low levels, posing a threat to aquatic life [See reference 156]. The Brent Rivers and Lake Operation Catchment, which comprises the River Brent and tributaries including Lower Brent, Wealdstone Brook, and Bently Priory, which flow through the West London Boroughs of Brent, Ealing, Harrow, Hounslow, Hillingdon, and the OPDC area, are considered to be in 'moderate' ecological health. The main reasons for the catchment not achieving good ecological status are the effects of pollution from multiple sources and physical modifications that have been made to the river channel and floodplain shape and structure, neglect and lack of visibility. All of the rivers, lakes and canals in the Brent Catchment also fail on Chemical quality [See reference 157] [See reference 158].

3.158 Under predicted climate change scenarios, more frequent drought conditions are expected in London and the South East of England, along with

increased demands on water resources. The combination of limited water resources and high demand has resulted in the Environment Agency designating the Thames Water region to be 'seriously' water stressed, meaning that more water is taken from the environment than the environment can sustain in the long term. Future developments will create additional demand for water abstraction from surface and groundwater sources in London. At a high level, it is broadly assumed that the quality of water bodies will improve in line with national objectives. However, water quality is influenced by a wide range of internal and external factors, including climate change, geology and soils, human consumption and population change, and pollution from human activities such as industry, agriculture, contaminated runoff from roads and other built surfaces, combined sewer overflows, and nutrient enrichment from treated wastewater.

Air and noise pollution

3.159 Human health, quality of life and the environment can all be negatively affected by air and noise pollution. The London Boroughs of Brent, Ealing, Harrow, Hounslow, and Richmond upon Thames have designated Air Quality Management Areas (AQMAs) covering their entire boroughs, while the Hillingdon AQMA covers approximately three-quarters of the borough. The OPDC area spans parts of Brent, Ealing, and Hammersmith & Fulham, all of which have borough-wide AQMAs.

3.160 Transport is the primary source of NO₂ and PM_{2.5} pollution in the local authorities' areas, with Heathrow Airport notably contributing to emissions in Hillingdon and Hounslow [\[See reference 159\]](#).

3.161 Air quality data for London shows that 2016 monitoring sites in London recorded over 4,000 hours above the safe threshold for NO₂. In 2023, this reduced to just 22 hours, a reduction of 99% in the number of hours when NO₂ concentrations exceeded the hourly legal limit. The introduction of the world's first 24-hour Ultra Low Emission Zone (ULEZ) in 2019, followed by its expansion across London in 2023, has helped transform the city into the largest clean air zone of its kind. As of 2023, over 95% of vehicles in London comply with ULEZ emissions standards, up from just 39% in 2017. Additionally, between 2019 and 2022, emissions of NO_x, PM_{2.5}, and CO₂ has reduced. Specifically, ULEZ policies were estimated to have reduced nitrogen oxides (NO_x) emissions from road traffic by 13,500 tonnes in London between 2019 and 2022 [\[See reference 160\]](#). The ULEZ covers all London boroughs, except for the area of the M25, and applies to all cars, motorcycles, vans and specialist

vehicles (up to and including 3.5 tonnes) and minibuses (up to and including 5 tonnes). The Mayor of London also designated a Low Emission Zone (LEZ), which covers all roads within Greater London, those at Heathrow and parts of the M1 and M4 are included, except the M25 (even where it passes within the GLA boundary). The LEZ is designed to target pollution from the heaviest polluting heavy diesel vehicles.

3.162 The WLWP boroughs declared AQMA for the following pollutants:

- Brent AQMA declared in 2006 for Nitrogen dioxide NO₂ and Particulate Matter PM₁₀
- Ealing AQMA declared in 2000 for Nitrogen dioxide NO₂ and Particulate Matter PM₁₀
- Harrow AQMA declared in 2002 for Nitrogen dioxide NO₂ and Particulate Matter PM₁₀
- Hounslow AQMA declared in 2006 for Nitrogen dioxide NO₂
- Hillingdon AQMA declared in 2003 for Nitrogen dioxide NO₂
- Richmond upon Thames AQMA declared in 2000 for Nitrogen dioxide NO₂ and Particulate Matter PM₁₀

3.163 There is a possibility that air quality may worsen in the long-term because of climate change, due to a greater likelihood of prolonged periods of still, dry days, and to-date this relationship has been difficult to predict. This will need to be considered in the potential development of air quality action plans and monitoring regimes, as will the effects of major infrastructure developments.

Implications for health

3.164 Air pollution is associated with several adverse health impacts and is recognised as a contributing factor in the onset of heart disease and cancer. Pollution particularly affects the most vulnerable in society such as children, the elderly, and those with existing heart and lung conditions. There is also often a strong correlation between poor air quality areas and less affluent areas.

3.165 London and the South East of England is one of the driest areas of the country and thus faces ongoing water resource challenges, growing demand, and uncertainty from climate change. In addition, poor water quality can increase the risk of water-borne disease.

Air, land and water key issues and evolution without the WLWP

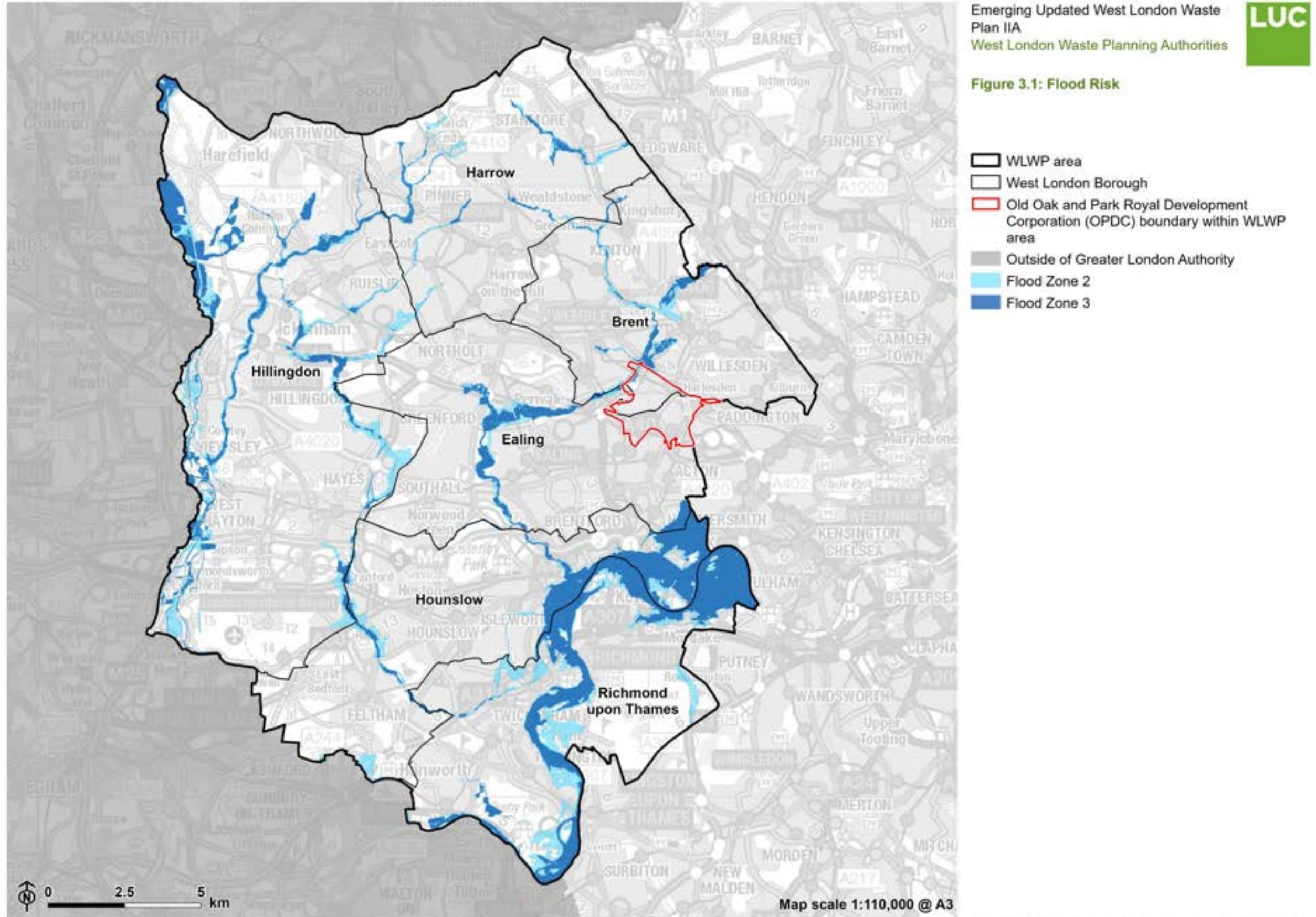
3.166 Without the WLWP, it is possible that waste development could result in the unnecessary sterilisation of mineral and soil resources thereby preventing their use for future generations, if any new proposals for waste facilities came forward. In the absence of the WLWP, the NPPF would apply, which also supports the reuse of brownfield land.

3.167 Without the WLWP, it is possible that unplanned development for waste could be in areas that could lead to further water quality issues and risks to the natural environment. However, existing safeguards, such as the Water Framework Regulations, would help to reduce the potential for this to occur. The WLWP provides an opportunity to ensure that waste development is designed to consider the sensitivity of the water environment and water-dependent protected sites, to incorporate sustainable drainage systems (SuDS), and to promote water efficiency and grey water recycling.

3.168 Air pollution associated with London's road network has exceeded statutory NO₂ levels and needs active monitoring and management. In the absence of the WLWP, the policies in the NPPF and the Clean Air Strategy [See reference 161] would apply which support measures to improve air quality through traffic and travel management; to develop and enhance green infrastructure; and to direct any unplanned waste development to sustainable locations which limits the need to travel and offer a choice of transport modes. In addition, the Mayor's ULEZ and LEZ designations remain in place, along with the waste planning authorities' various Air Quality SPDs, Action Plans and Strategies.

3.169 However, there is a risk that local air quality could be worsened by new waste development, particularly through emissions from conventional fossil-fuel based transport of waste. The WLWP could support a spatial strategy that could seek to use more sustainable alternatives to emission-generating fossil-fuel based road transport of waste. This could include switching waste transport to more sustainable modes or to low and zero carbon road-based transport.

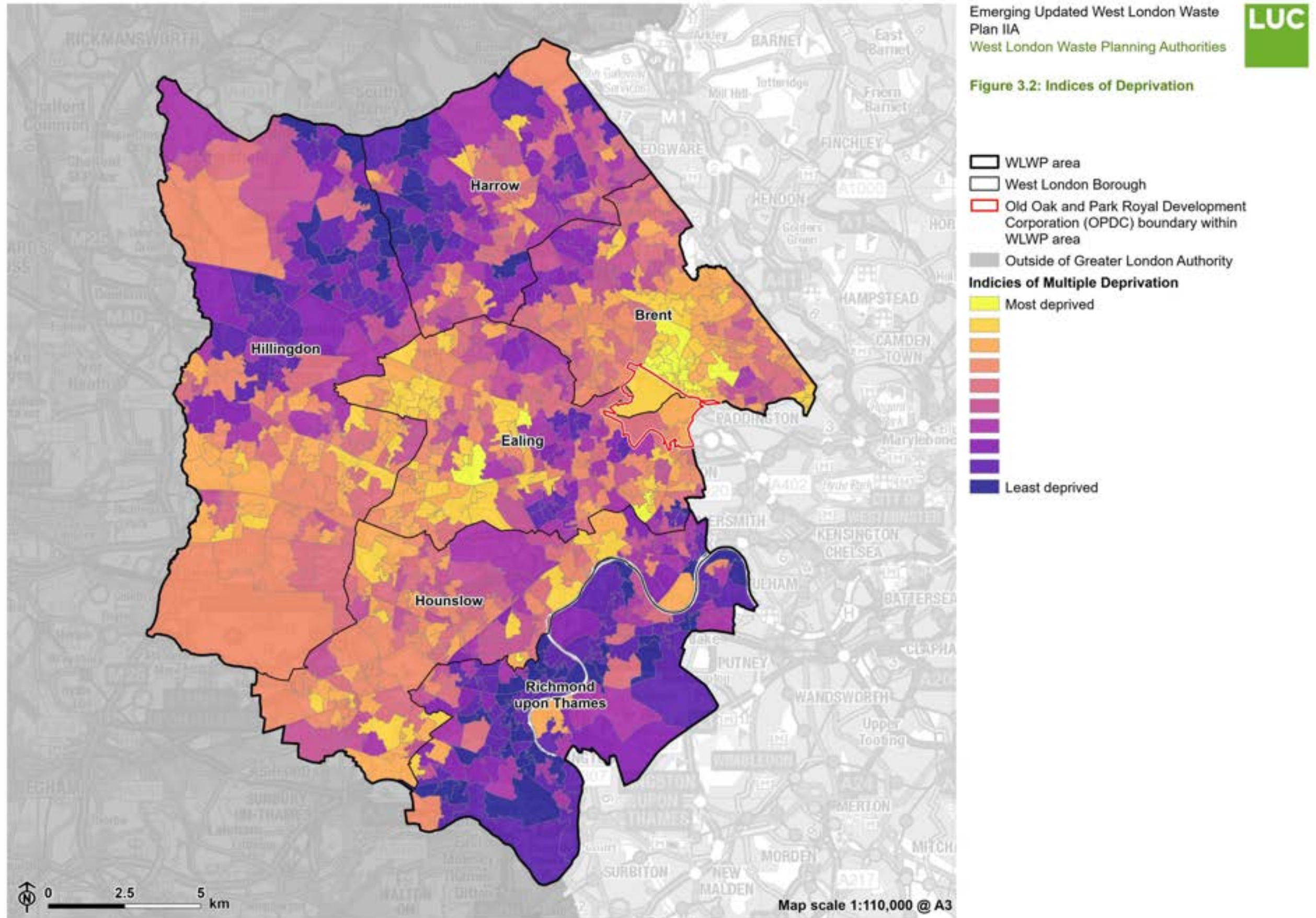
Figure 3.1: Areas of Flood Risk



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Figure 3.2: Indices of Deprivation



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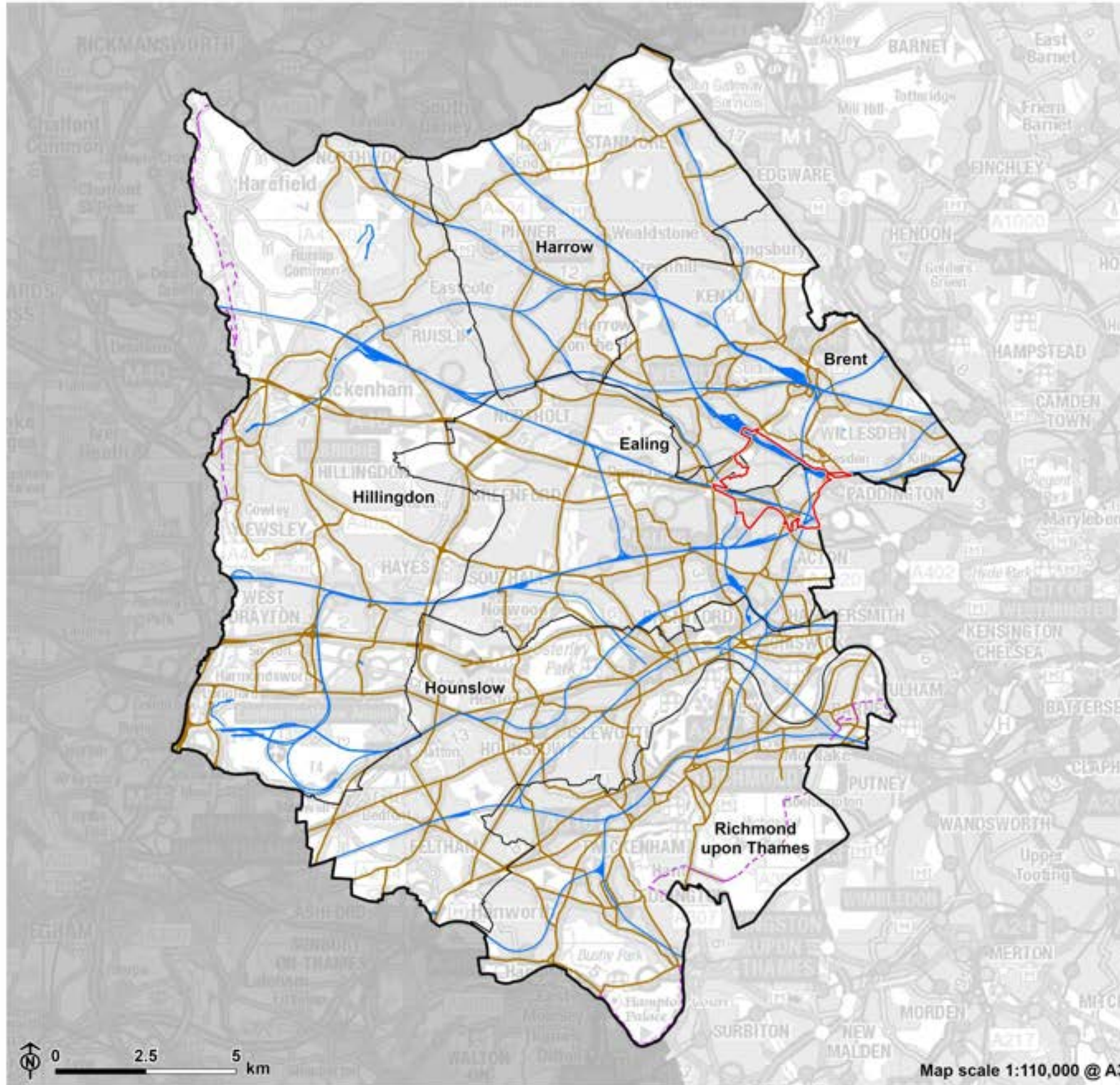
Figure 3.3: Transport Network within the WLWP area

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Plan IIA
West London Waste Planning Authorities



Figure 3.3: Transport Network

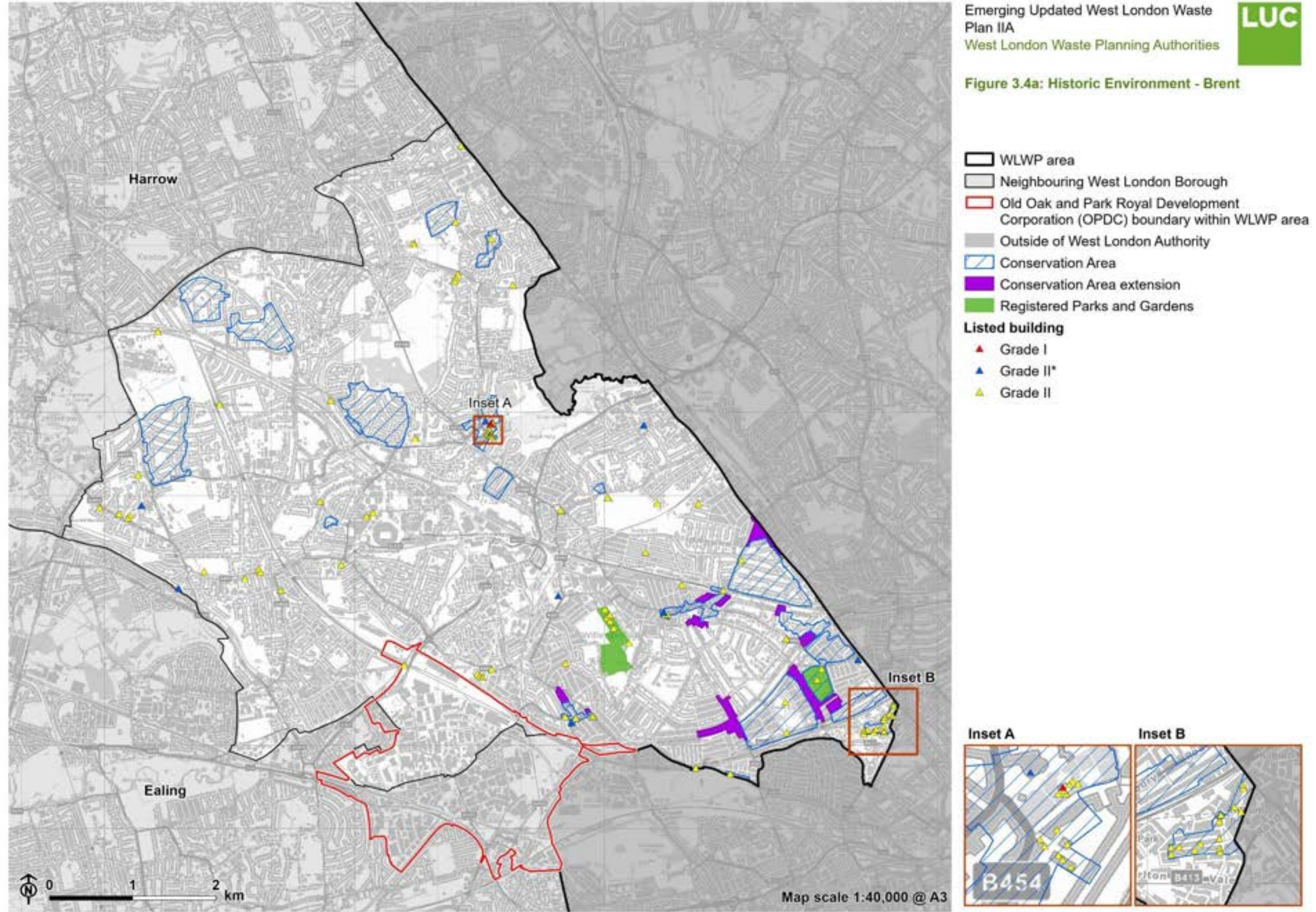
- WLWP area
- West London Borough
- Old Oak and Park Royal Development Corporation (OPDC) boundary within WLWP area
- Outside of Greater London Authority
- National Cycle Network
- Major road
- Railway



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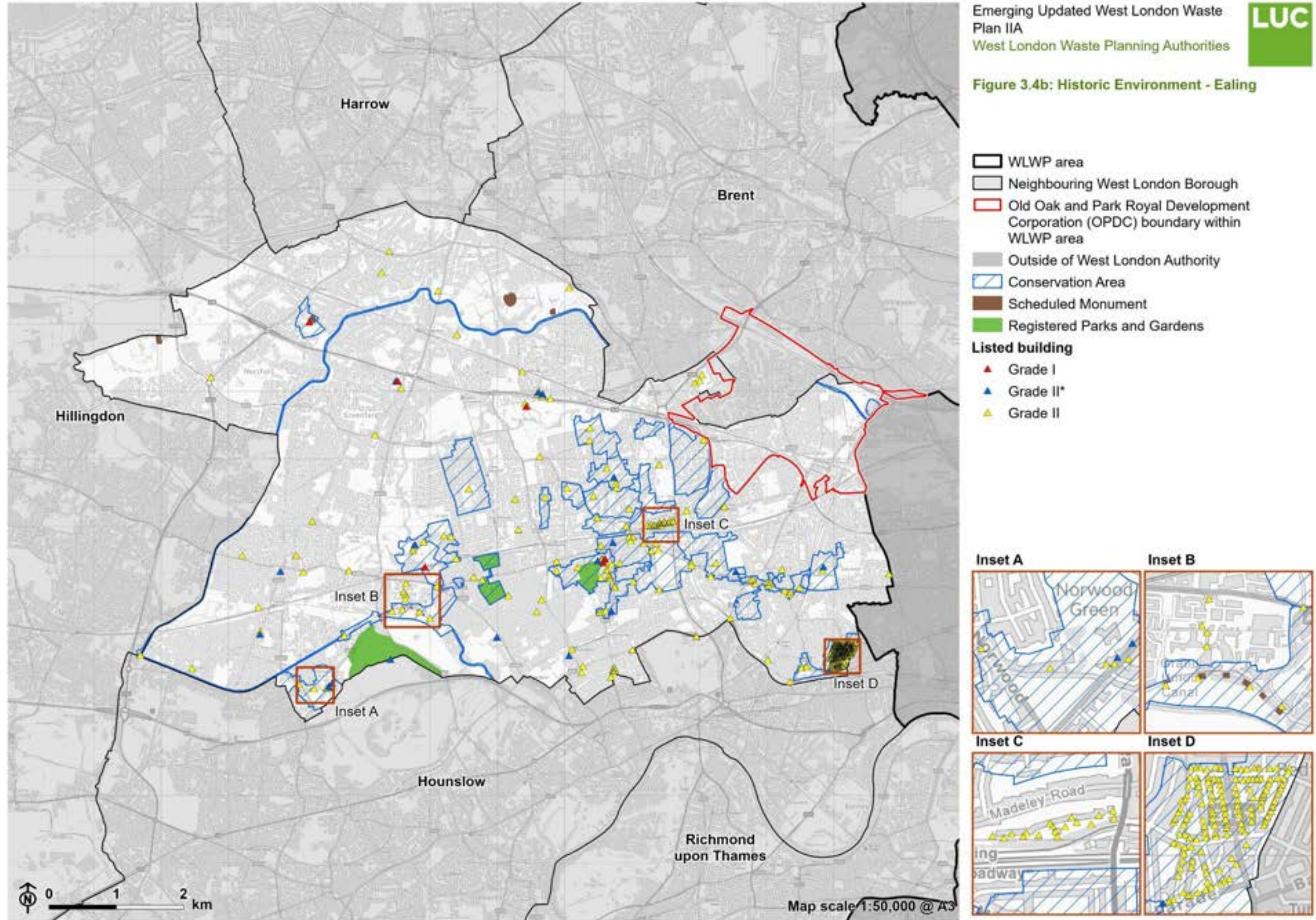
13044_Scoping_20250117/13044_003_Fig3_3_r1_Transport_A3L 19/06/2025

Figure 3.4a: Historic Environment - Brent



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Figure 3.4b: Historic Environment - Ealing



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Figure 3.4c: Historic Environment - Harrow

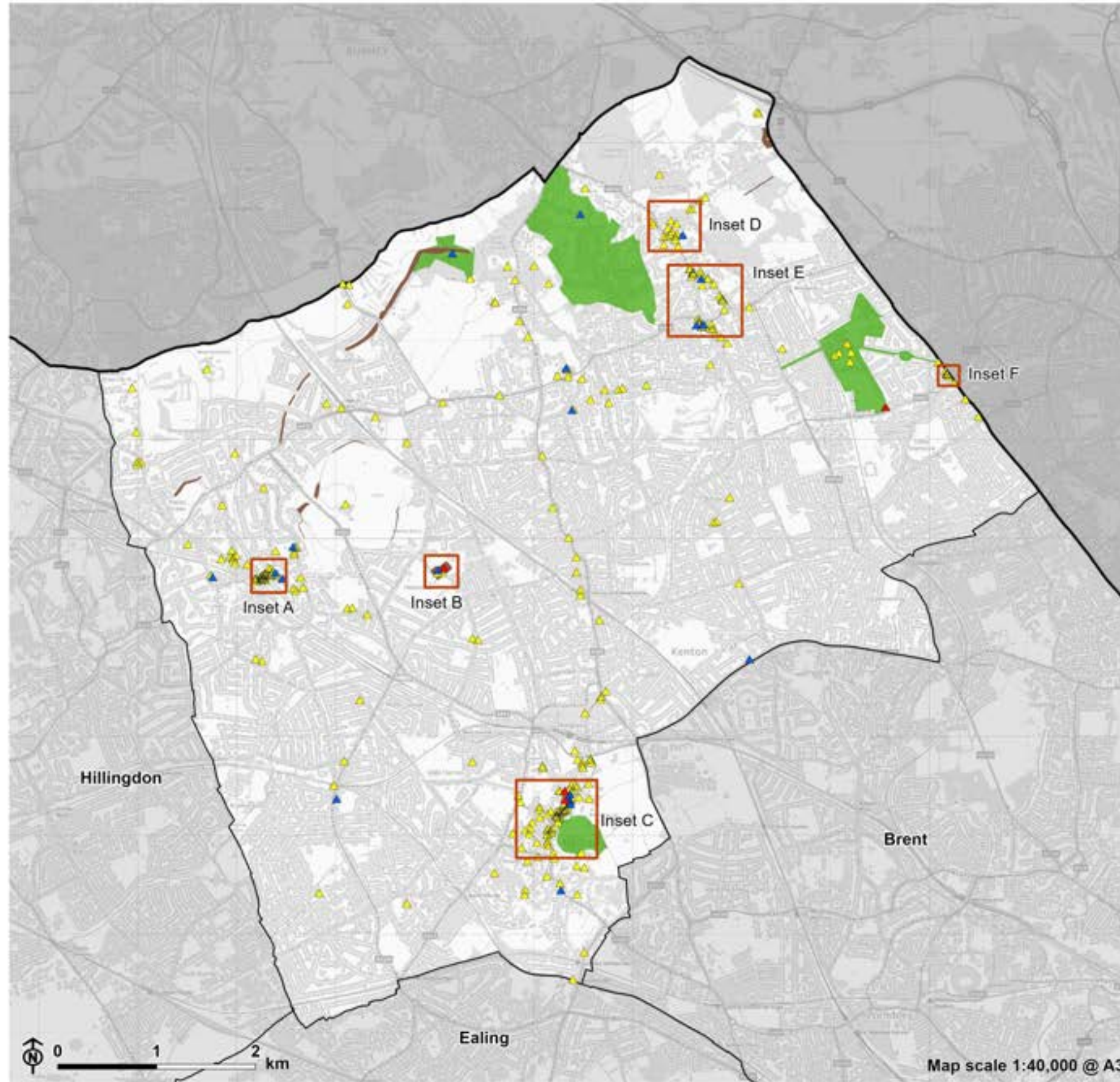


Figure 3.4c: Historic Environment - Harrow

-  WLWP area
-  Neighbouring West London Borough
-  Outside of West London Authority
-  Scheduled Monument
-  Registered Parks and Gardens
- Listed building**
-  Grade I
-  Grade II*
-  Grade II

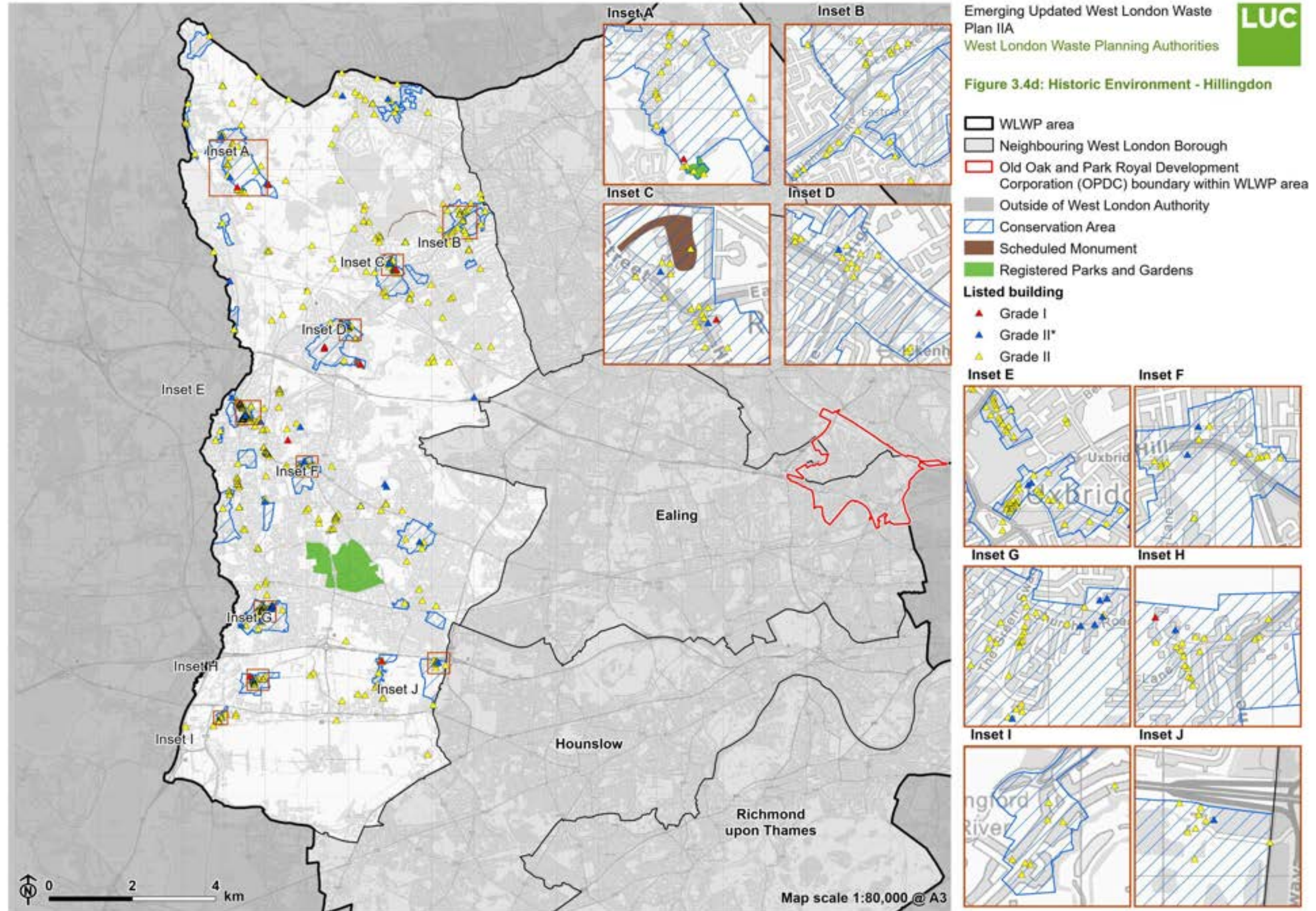


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Map scale 1:40,000 @ A3

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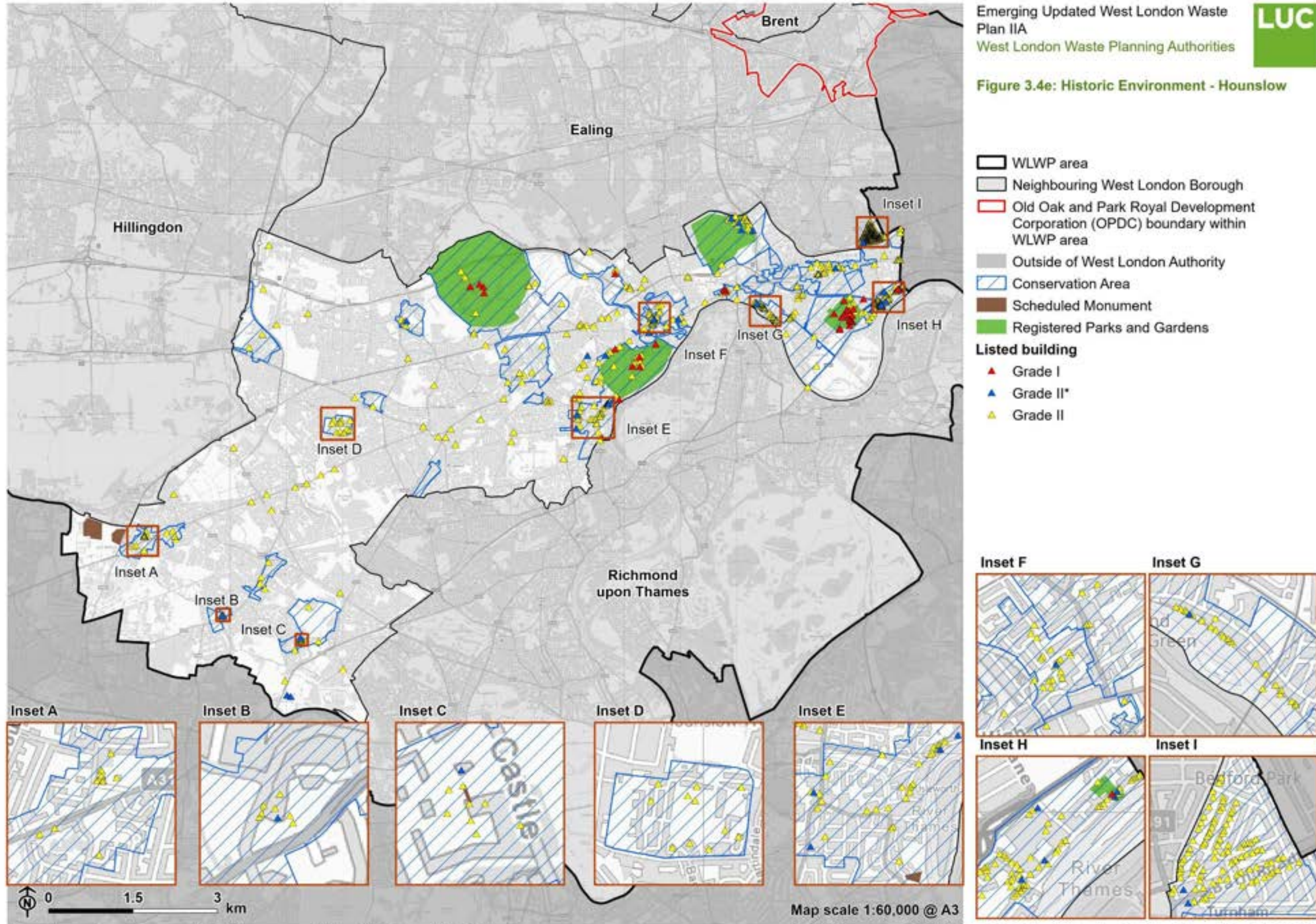
Figure 3.4d: Historic Environment - Hillingdon



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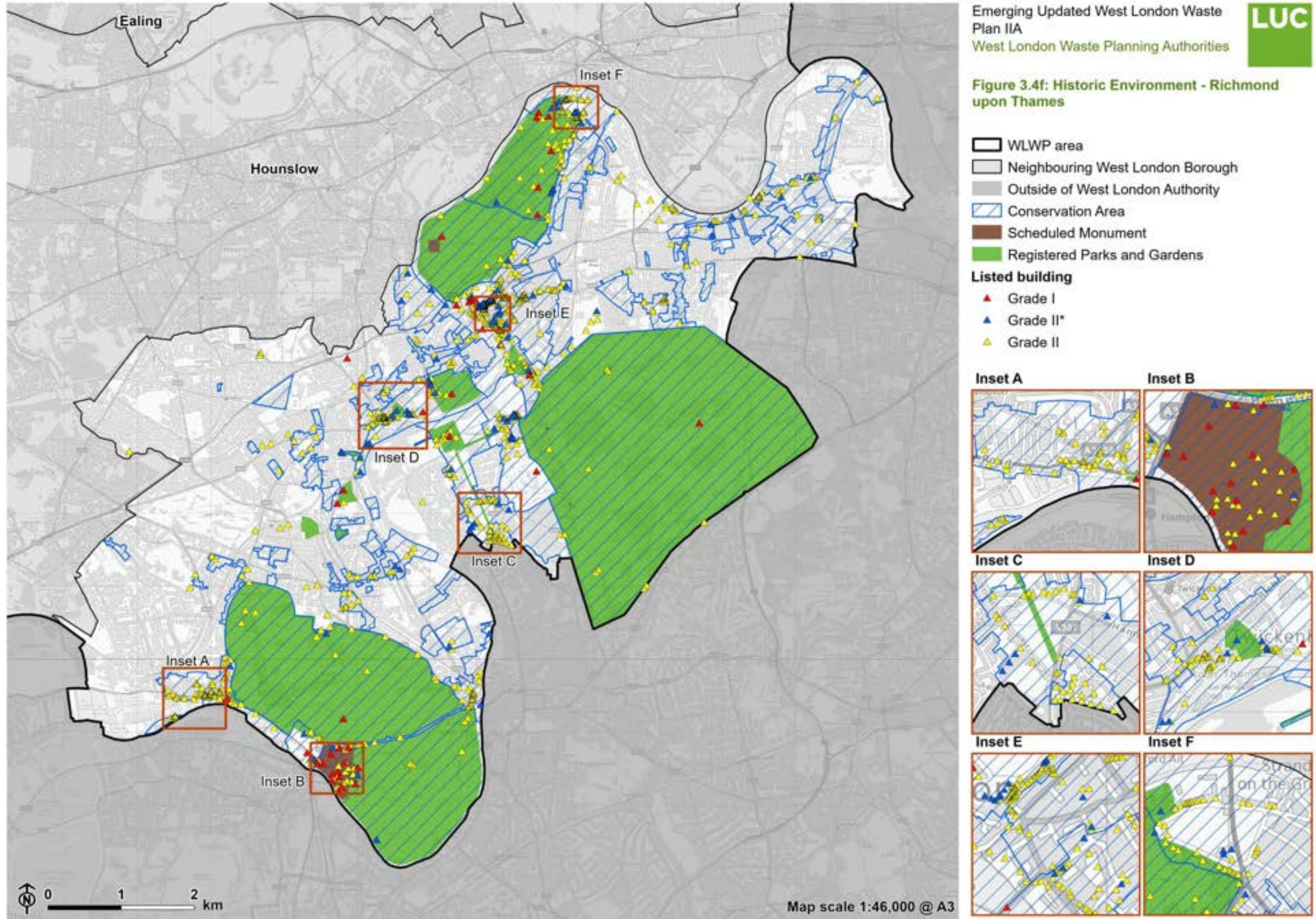
Figure 3.4e: Historic Environment - Hounslow



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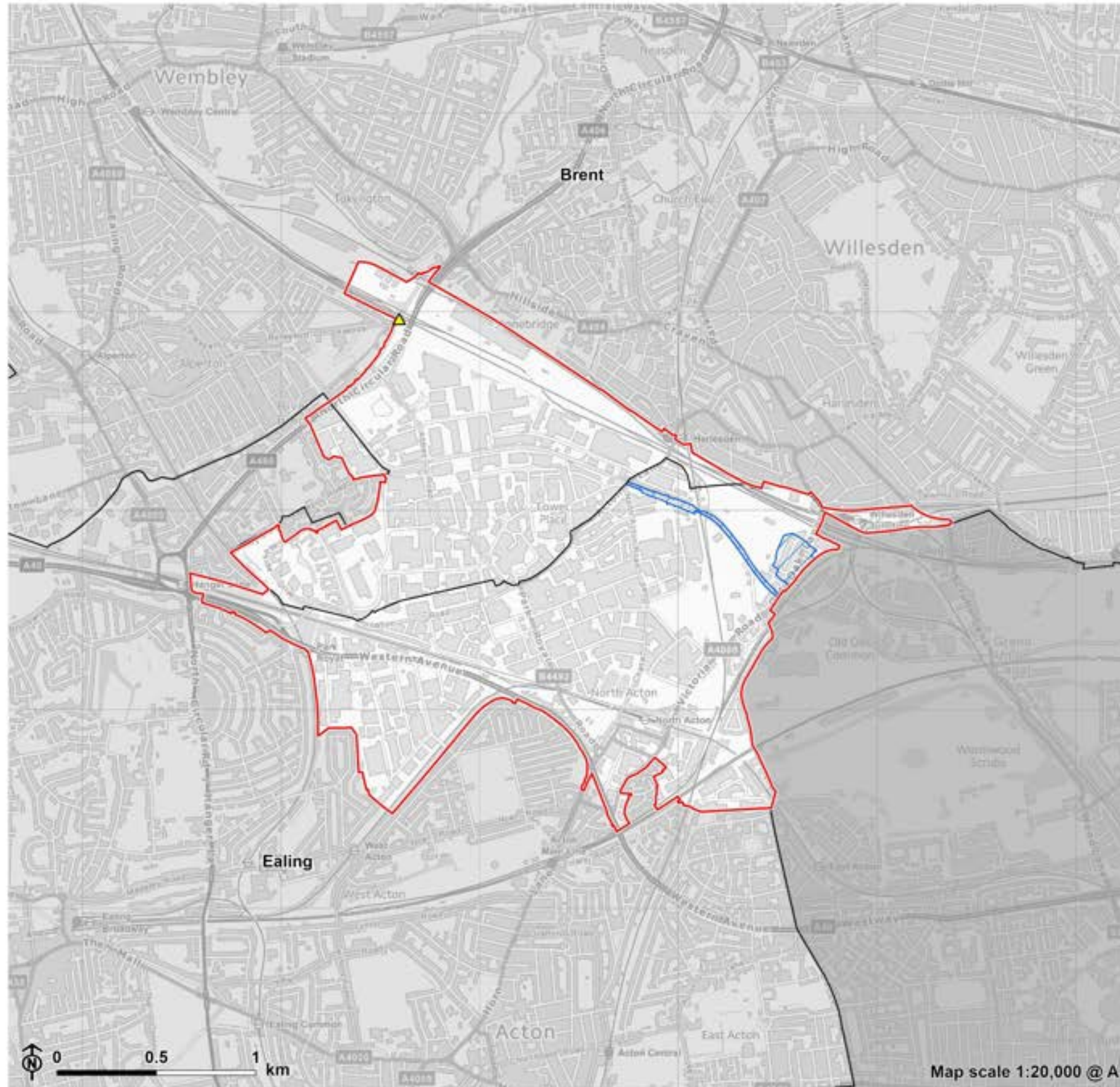
Figure 3.4f: Historic Environment - Richmond upon Thames



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Figure 3.4g Historic Environment – Old Oak Park and Common Development Corporation



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**Figure 3.4g: Historic Environment - Old Oak
and Park Royal Development Corporation
(OPDC)**

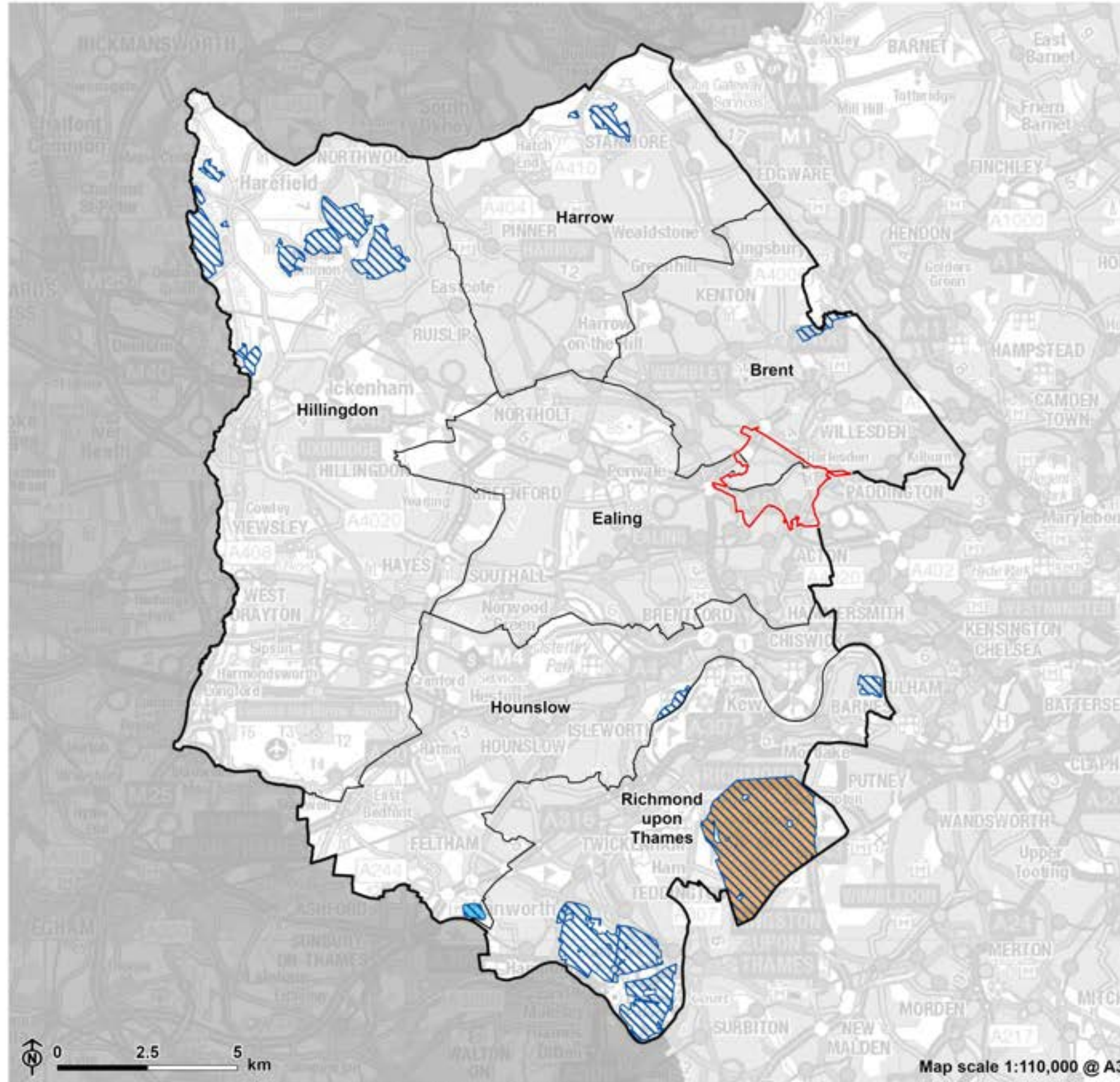
-  Old Oak and Park Royal Development Corporation (OPDC) boundary within WLWP area
-  West London Borough
-  Outside of West London Authority
-  Conservation Area
- Listed building**
 -  Grade II

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Map scale 1:20,000 @ A3

13044_Scoping_20250117/13044_004g_Fig3_4g_r0_HistoricEnv_A3L 19/06/2025

Figure 3.5: Biodiversity



Emerging Updated West London Waste Plan IIA
West London Waste Planning Authorities



Figure 3.5: Biodiversity

- WLWP area
- West London Borough
- Old Oak and Park Royal Development Corporation (OPDC) boundary within WLWP area
- Outside of Greater London Authority
- Site of Special Scientific Interest (SSSI)
- Special Area of Conservation (SAC)
- Special Protection Area (SPA)

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Chapter 4

Integrated Impact Assessment Framework

4.1 The SEA Regulations, Schedule 2(6) require the Environmental Report to consider:

“The likely significant effects on the environment, including short, medium and long term effects, permanent and temporary effects, positive and negative effects and secondary, cumulative and synergistic effects, on issues such as (a) biodiversity, (b) population, (c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage including architectural and archaeological heritage, (l) landscape and (m) the inter-relationship between the issues.”

4.2 The development of a set of IIA objectives (known as the IIA Framework) is a recognised way in which the likely environmental and sustainability effects of a plan can be described, analysed and compared. The formulation of the IIA Framework presented overleaf, considered the SA Frameworks set out in the SA documents for each of the Local Planning Authorities within the WLWP area. The frameworks have also been reviewed to consider the requirements of Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA) as well as Sustainability Appraisal (SA), the latest baseline and key sustainability issues and opportunities identified for each of the authorities (see **Chapter 3**), and the latest targets and objectives set out in other relevant plans, programmes and strategies (see **Appendix A**). This IIA Framework will help to ensure that the IIA of the WLWP reflects recent global events (such as the COVID-19 pandemic), challenges and priorities.

4.3 The IIA objectives and appraisal guidance (which provide a guide to the factors that should be considered when carrying out assessments) set out in the IIA Framework are subject to change as new information comes to light during the IIA process.

4.4 The IIA Framework for the appraisal of the WLWP is set out below; each primary bullet point constitutes an IIA objective and the sub-bullet points set out further questions to help guide the appraisal of each objective. The questions included in the framework are not exhaustive, and some may be more relevant to certain Plan elements than others. The framework below also highlights the most relevant SEA topics for each IIA objective, and whether each objective

supports the WLWP Health Impact Assessment and/or Equalities Impact Assessment.

IIA framework for the WLWP

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

Appraisal questions:

- Will it [the WLWP] promote energy efficiency by encouraging the use of energy efficient buildings and plant, and the use of appropriate renewable or low carbon energy sources on waste sites?
- Will it reduce the WLWP's contribution to climate change by reducing greenhouse gas emissions from waste management activities?
- (Note that carbon emissions associated with waste transport are dealt with under IIA objective 5.)
 - SEA topics covered: Climatic Factors; Air; Water; Material assets; Population; Human health.
 - Equalities Impact Assessment: all Equality Act 2010 protected characteristics.
 - Health Impact Assessment: Activities that generate greenhouse gas emissions often generate other pollutants that adversely affect health and wellbeing.

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

Appraisal questions:

- Will it promote the re-use, recycling and recovery of waste in accordance with the waste hierarchy?
- Will it contribute to minimising disposal of all forms of waste, across the WLWP area and across the wider London area?

- Will it contribute to the aim in the London Plan of a zero waste city by 2050?
- Will it promote a circular low carbon economy within the WLWP area, and within London?
- Will it support community engagement and education to empower local communities to take action to reduce waste?
 - SEA topics covered: Population; Human health; Material assets.
 - Equalities Impact Assessment: all Equality Act 2010 protected characteristics.
 - Health Impact Assessment: Promoting the sustainable treatment of waste provides mental health benefits of security and physical health benefits of having a healthy living environment.

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

Appraisal questions:

- Will it generate employment opportunities in the waste and resource sector for local people, especially within areas of deprivation, providing opportunities to improve local skills?
- Will it minimise harm to the existing local economy, locating waste uses away from existing sensitive receptors?
 - SEA topics covered: Population and human health; Material assets.
 - Equalities Impact Assessment: all Equality Act 2010 protected characteristics.
 - Health Impact Assessment: Security of employment is important for mental wellbeing.

IIA objective 4: Protect and improve people's health

Appraisal questions:

- Will it avoid or minimise adverse effects on human health and safety, including disproportionate impacts on communities, including those with

protected characteristics, mental health vulnerabilities, and those in more deprived areas?

- Will it provide opportunities to improve health and amenity through delivery of green infrastructure, enhanced public rights of way and improved access to recreation as part of the restoration of sites, or provision of biodiversity net-gain in any redeveloped sites?
- Will it avoid or minimise adverse effects on the quality and extent of existing recreational assets?
- Will it reduce the incidence of crime associated with waste (e.g. fly-tipping and illegal dumping of large amounts of waste) by ensuring a sustainable network of waste facilities across the WLWP area, and London?
 - SEA topics covered: Population; Human Health.
 - Equalities Impact Assessment: all Equality Act 2010 protected characteristics.
 - Health Impact Assessment: This objective directly addresses health and wellbeing:
 - Ensuring access to green infrastructure means that people can meet their daily needs, ensuring both physical and mental wellbeing.
 - Reducing crime, anti-social behaviour and fear of crime is important for physical and mental wellbeing.

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

Appraisal questions:

- Will it manage waste as close to source as possible?
- Will it support an overall reduction in the distance travelled by waste, either within the WLWP area or across the wider London area?
- Will it contribute towards a reduction in traffic congestion, particularly where areas of poor air quality might be affected?
- Will it reduce reliance on road-based freight movements and support the use of rail and water where this represents a deliverable, efficient and sustainable choice?

- Will it support the transition from low to ultra-low and then zero emission vehicles for the transportation of waste by road?
 - SEA topics covered: Air; Climatic factors; Population; Human Health; Biodiversity.
 - Equalities Impact Assessment: all Equality Act 2010 protected characteristics.
 - Health Impact Assessment: Encouraging active travel, such as walking, wheeling and cycling can have a wider range of positive implications for health, including increased physical activity and opportunities for social interaction. In addition, an increase in active travel would be associated with a decrease in vehicular transport and an associated decrease in air pollutants that can be harmful to human health. Poor air quality can lead to and aggravate respiratory diseases.

IIA objective 6: Protect and enhance the historic environment

Appraisal questions:

- Will it conserve, protect and enhance designated and undesignated heritage assets and their settings?
 - SEA topics covered: Historic environment; Landscape.
 - Equalities Impact Assessment: all Equality Act 2010 protected characteristics.
 - Health Impact Assessment: The historic environment can promote wellbeing by providing a sense of place, pride in the local area, and intellectual stimulation.

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

Appraisal questions:

- Will it avoid effects on habitats of international, national, regional or local importance?

- Will it protect and enhance habitats of international, national, regional or local importance?
- Will it protect and improve local populations of terrestrial species that are of international, national, regional or locally importance?
- Taking into account the impact of climate change, will it conserve and enhance designated and undesignated ecological assets and networks?
- Will it maintain and enhance wildlife corridors and minimise fragmentation of ecological areas and green spaces, enhancing biodiversity and securing the level of net-gain set out in local, regional and national policy?
- Will it protect and support enhanced knowledge and understanding of geological sites of national, regional or local importance?
 - SEA topics covered: Biodiversity; Climatic Factors; Soil; Water.
 - Equalities Impact Assessment: all Equality Act 2010 protected characteristics.
 - Health Impact Assessment: Well-functioning ecosystems provide a range of ecosystem services, including clean air and water, pollination of food crops and opportunities for recreation. Connection with nature can improve mental wellbeing.

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

Appraisal questions:

- Will it minimise the visual intrusion of waste facilities on sensitive and/or distinct townscapes?
- Will it enhance and protect townscape features including open spaces, parks and gardens and their settings?
- Will it provide for the restoration of land to an appropriate after-use including the creation of accessible greenspaces and open spaces at former waste sites?
 - SEA topics covered: Historic environment; Landscape.
 - Equalities Impact Assessment: all Equality Act 2010 protected characteristics.

- Health Impact Assessment: The landscape and townscape can promote wellbeing by providing a sense of place, a sense of peace and beauty, interest and providing sites for recreation.

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

Appraisal questions:

- Will it maximise the efficient use of water?
- Will it protect the quantity of ground and surface water from over abstraction?
- Will it protect and enhance the quality of watercourses and water bodies?
 - SEA topics covered: Climatic factors; Water; Soil; Population; Human health; Biodiversity.
 - Equalities Impact Assessment: Equality Act 2010 protected characteristics:
 - Age: Children (0-4), Younger people (aged 18-24), older people (aged 60 and over);
 - Disability: Disabled people, people with physical and mental impairment; and
 - Pregnancy and maternity.
 - Health Impact Assessment: Issues with water quality and availability can result in the spread of disease and impact on mental health. Increased risk of flooding resulting from climate change poses risks to physical and mental health.

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

Appraisal questions:

- Will it promote the use of SuDS, nature-based solutions or other flood resilient design measures?

- Will it ensure waste developments are not at risk of flooding both presently and in the future, taking into account climate change, and will it not result in an increase in the risk of flooding elsewhere?
 - SEA topics covered: Climatic factors; Water; Soil; Population; Human health; Biodiversity.
 - Equalities Impact Assessment: Equality Act 2010 protected characteristics:
 - Age: Children (0-4), Younger people (aged 18-24), older people (aged 60 and over);
 - Disability: Disabled people, people with physical and mental impairment; and
 - Pregnancy and maternity.
 - Health Impact Assessment: Flooding can result in emotional and financial stress, as well as the spread of disease.

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

Appraisal questions:

- Will it minimise pollution and impacts on amenity, including from noise, vibration, odour and light, from activities associated with waste developments and minimise the potential for such pollution, particularly in areas already subject to noise and light pollution?
- Will it minimise air pollution and help achieve the objectives of Air Quality Management Plans, particularly within the designated AQMAs?
 - SEA topics covered: Air; Climatic factors; Population; Human health; Biodiversity.
 - Equalities Impact Assessment: all Equality Act 2010 protected characteristics.
 - Health Impact Assessment: Poor air quality as well as other amenity nuisances can lead to and aggravate respiratory diseases, and impact on mental health.

IIA objective 12: Protect and enhance mineral resources and soils

Appraisal questions:

- Will it ensure the safeguarding of mineral resources from sterilisation by waste management related development?
- Will it safeguard soil quality and quantity and reduce soil contamination?
- Will it avoid the loss of the best and most versatile agricultural land?
- Will it minimise effects on Regionally Important Geological Sites?
 - SEA topics covered: Material assets; Climatic factors; Soil; Water; Biodiversity; Landscape.
 - Equalities Impact Assessment: all Equality Act 2010 protected characteristics.
 - Health Impact Assessment: Sustainable use of resources ensures that resources are available for essential infrastructure, including transport, health centres and local amenities. Optimising reuse and minimising waste also benefit the wider environment and the ecosystem services it provides. Best and most versatile land is important for food growing.

Predicting and evaluating effects

4.5 The prediction and evaluation of the effects of options in the WLWP relies heavily on the IIA Framework – every policy option (and reasonable alternative) will be appraised for their likely impacts in relation to achievement of the IIA objectives. In line with the SEA Regulations, the following characteristics of effects will be predicted and evaluated:

- Probability;
- Duration, including short, medium and long-term impacts;
- Frequency;
- Reversibility;
- Cumulative and synergistic nature;
- Transboundary nature;
- Secondary nature;

- Permanent or temporary nature; and
- Positive or negative nature.

Probability

4.6 There is an inherent degree of uncertainty in carrying out an IIA. Once adopted, the WLWP is expected to be in force for several years. Over this time, currently unforeseen changes are likely to occur. These circumstances are impossible to predict. The planning system is generally robust enough to deal with such changes by re-assessing the needs of sites and communities at the time applications are made. Uncertainties are dealt with in IIA by adopting a precautionary approach, wherein a reasonable worst-case scenario is assumed unless reliable evidence suggests otherwise. This is to ensure that any potentially significant negative effects are identified, and appropriate consideration is given to how the WLWP could help to avoid or mitigate the worst effects if such scenarios were to arise. However, it is accepted that the likelihood of many such worst-case scenarios occurring is low, particularly as the comprehensive array of policies proposed in WLWP would help to avoid or mitigate negative impacts.

4.7 The assessment of WLWP options will indicate where uncertainties exist in relation to the effects identified.

Duration, including short, medium and long-term impacts

4.8 For the purposes of the IIA:

- Short term covers the period for 0-5 years, or during construction (inclusive of temporary impacts);
- Medium term covers the period from 5-20 years; and
- Long term covers the period over 20 years and beyond the Plan period.

4.9 Effects can occur over multiple terms, such as arising in the short-term and residing in the long-term.

Frequency

4.10 All effects of the WLWP are considered to occur once, unless indicated otherwise.

Reversibility

4.11 The assessment will consider whether effects are reversible or irreversible. Reversible effects may be identified where a former waste site is proposed for restoration to open space; irreversible effects may be identified where new waste development would result in the loss of open space, metropolitan open land (MOL) or Green Belt land.

Cumulative and synergistic effects

4.12 The IIA will provide an appraisal of all reasonable options considered for inclusion in the WLWP. The vision, strategic objectives and policies of the Plan will not be adopted in isolation and therefore an evaluation of the cumulative and synergistic effects will be undertaken. Cumulative and synergistic effects are defined as follows:

- Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect, or where several individual effects have a combined effect; and
- Synergistic effects interact to produce a total effect greater than the sum of the individual effects, so that the nature of the final impact is different to the nature of the individual impacts.

Transboundary effects

4.13 The geographical extent of effects will be experienced predominantly in the WLWP area. However, where effects would be likely to be discernible in neighbouring authorities or at a greater scale, this will be specified. For example, transboundary effects may be experienced in relation to waste transported across local authority boundaries, either through an increase in air pollution or an increase in waste to be dealt with outside of the plan area.

Secondary effects

4.14 The assessment process inherently includes a consideration of secondary effects. Secondary effects are defined as “effects that are not a direct result but occur away from the original effect or as a result of a complex pathway”.

Permanent or temporary

4.15 The assessment will indicate whether effects are temporary or permanent in nature. Should the WLWP be adopted, it would only be in place for the Plan period and would subsequently be replaced by a new or revised WLWP. Many of the effects of policies in the Plan are therefore typically temporary effects. Nevertheless, several of the effects of new development on a greenfield site would be likely to be permanent (e.g. changes in landscape/townscape).

Positive and negative effects and significance

4.16 The IIA will evaluate whether the nature of effects is likely to be positive, negative or mixed. The magnitude of effects in relation to each IIA objective will be defined as significant or minor. For example, a significant positive effect would be identified where an option is likely to significantly contribute to the achievement of an IIA objective, whereas an adverse effect (either significant or minor negative) would be identified where the option conflicts with the IIA objective. Options which are unlikely to significantly influence whether an objective will be achieved will receive a 'no effect' rating. Mixed effects may be identified where an option is expected to have both a positive and negative effect on the IIA objective.

4.17 The IIA assessments will be carried out at a high level and so the dividing line between sustainability effects is often quite small. The effect of an option on a IIA objective will be significant where it is of such magnitude that it will have a noticeable and measurable effect compared with other factors that may influence the achievement of that IIA objective.

4.18 Minor effects will still be identified as these assist with the identification of cumulative and synergistic effects (e.g. several minor effects can combine to become a significant effect), can help to identify opportunities for enhancements (e.g. enhancing a minor positive effect to make it significant) and better enable the Authorities to make a more informed decision over the sustainability performance of options.

4.19 In determining the significance of the effects of the options for potential inclusion in the WLWP, the IIA will consider the plan's relationship with the other documents in the planning system such as the NPPF and other national policy approaches, and regulatory requirements, as these may provide additional safeguards or mitigation of potentially significant adverse effects.

4.20 The findings of the IIA will be presented as a colour coded symbol showing a score for each option (including reasonable alternatives) against each of the IIA objectives along with a concise justification for the score given, where appropriate. The use of colour coding in the matrices will allow for the magnitude of effects (both positive and negative) to be easily identified. **Table 4.1** presents the colour coded symbols and definitions that will be used to report the significance of effects of the WLWP policies and their reasonable alternatives.

Table 4.1: Effect symbols and colours used in IIA

IIA Effect	Description of Effect
++	Significant positive effect likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect likely
+/-	Mixed minor effects likely
++/--	Mixed significant effects likely
-	Minor negative effect likely
--/+	Mixed significant negative and minor positive effects likely
--	Significant negative effect likely
0	No or negligible effect likely
?	Likely effect uncertain
N/A	Assessment criterion not applicable

Reasonable alternatives

4.21 The IIA must appraise not only the preferred options for inclusion in the WLWP but also ‘reasonable alternatives’ to these options. This implies that alternatives that are not reasonable do not need to be subject to appraisal. Part

(b) of Regulation 12(2) notes that reasonable alternatives will consider the objectives of the plan, as well as its geographical scope. Therefore, alternatives that do not meet the objectives of national policy or are outside the Plan area are unlikely to be reasonable. PAS guidance on SA [\[See reference 162\]](#) notes that reasonable alternatives should be real options that would be likely to be chosen and able to be delivered; reasons do not need to be given for rejecting obvious non-starters. Alternative plan objectives do not need to be assessed.

4.22 For the WLWP, therefore, there may be reasonable alternatives (i.e. different ways of achieving) the policies being considered for inclusion within the WLWP, and these are currently in the process of being identified and reviewed. The authorities' reasons for selecting the preferred policy options for inclusion in the WLWP and rejecting the alternative policy options will be reported at a later stage in the IIA process.

Health Impact Assessment

4.23 The background and overall approach to HIA is set out in **Chapter 1**. The IIA Framework above identifies the IIA objectives that will help to assess any impact on the health and wellbeing of the population.

Equality Impact Assessment

4.24 This report summarises data regarding the protected characteristics within **Chapter 3**. The IIA Framework above identifies the IIA objectives that will help to assess any impacts on equalities. The WLWP will therefore be assessed to consider the likely impacts of policy options on each of the nine protected characteristics from the Equality Act.

Chapter 5

Conclusion and next steps

5.1 In order to meet the requirements of the SEA Regulations, the views of the three statutory consultees (Natural England, Historic England and the Environment Agency) are being sought in relation to the scope and level of detail to be included in the IIA report.

5.2 In particular, the consultees are requested to consider:

- Whether any additional international or national plans and programmes should be included in the policy review (see **Appendix A**) because their objectives are of particular relevance to the sustainability of the WLWP (see **Chapter 2**).
- Whether the information provided in **Chapter 3** provides a sufficient baseline against which the WLWP's sustainability effects can be assessed and monitored, and which allows exiting sustainability issues of relevance to the WLWP to be identified.
- Whether there are any additional key sustainability issues of relevance to the WLWP (**Chapter 3**) that should be included.
- Whether the IIA Framework (**Chapter 4**) is appropriate and includes a suitable range of objectives relevant to the WLWP's remit.

5.3 As the WLWP is drafted, its vision, objectives and policies and reasonable alternatives to these will be subject to appraisal against the IIA Framework presented in **Chapter 4**. A full IIA Report (incorporating the later stages of the IIA process) will then be produced and made available to stakeholders and the general public for consultation alongside the emerging draft WLWP.

LUC

June 2025

Appendix A

Review of relevant plans, policies and programmes

International

IPCC's Sixth Assessment Report on Climate Change (IPCC, 2022)

Key objectives relevant to the WLWP

- To limit and/or reduce all greenhouse gas emissions which contribute to climate change.

Key targets and indicators relevant to the WLWP

- None.

Implications for the WLWP

- Plan should support reduction in emissions of greenhouse gases.

Implications for the IIA

- Include sustainability objectives to support reduction in emissions of greenhouse gases.

Johannesburg Declaration on Sustainable Development (2002)

Key objectives relevant to the WLWP

- Commitment to building a humane, equitable and caring global society aware of the need for human dignity for all.
- Areas of focus include:

- Sustainable consumption and production patterns.
- Accelerate shift towards sustainable consumption and production – 10-year framework of programmed of action.
- Reverse trend in loss of natural resources.
- Renewable energy and energy efficiency.
- Urgently and substantially increase Global share of renewable energy.
- Significantly reduce the rate of biodiversity loss by 2010.

Key targets and indicators relevant to the WLWP

- To promote greater resource efficiency, increase energy efficiency and develop new technology for renewable energy.

Implications for the WLWP

- Allocate sites and develop policies that take account of the Declaration.

Implications for the IIA

- Include sustainability objectives to enhance the natural environment and promote renewable energy and energy/resource efficiency.

Aarhus Convention (1998)

Key objectives relevant to the WLWP

- Established a number of rights of the public with regard to the environment.
- Local authorities should provide for:
 - The right of everyone to receive environmental information.
 - The right to participate from an early stage in environmental decision making.
 - The right to challenge in a court of law public decisions that have been made without respecting the two rights above or environmental law in general.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Allocate sites and develop policies that take account of the Convention.

Implications for the IIA

- Ensure that the public are involved and consulted at all relevant stages of IIA production.

Bern Convention (1979)

Key objectives relevant to the WLWP

- The Convention on the Conservation of European Wildlife and Natural Habitats (the Bern Convention) was adopted in Bern, Switzerland in 1979, and came into force in 1982.
- The principal aims of the Convention are to ensure conservation and protection of wild plant and animal species and their natural habitats (listed in Appendices I and II of the Convention), to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species) listed in Appendix III.
- To this end the Convention imposes legal obligations on contracting parties, protecting over 500 wild plant species and more than 1,000 wild animal species.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Allocate sites and develop policies that take account of the Convention.

Implications for the IIA

- Include sustainability objectives to protect and enhance biodiversity.

Ramsar Convention – Convention on Wetlands of International Importance (1971)

Key objectives relevant to the WLWP

- To promote the conservation and wise use of all wetlands through local, regional and national actions and international co-operation, as a contribution towards achieving sustainable development throughout the world.

Key targets and indicators relevant to the WLWP

- The number of Ramsar sites being designated in the UK.

Implications for the WLWP

- Plan should promote the conservation and make wise use of all wetland areas.

Implications for the IIA

- Consider inclusion of objectives which aim to promote conservation and wise use of wetland areas.

UN Paris Climate Change Agreement (2015)

Key objectives relevant to the WLWP

- International agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Allocate sites and develop policies that take account of the Agreement.

Implications for the IIA

- Consider climate change.

National

NPPF (2024)

Key objectives relevant to the WLWP

- Economic objective:
 - To help build a strong, responsive and competitive economy
 - By ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity
 - By identifying and coordinating the provision of infrastructure.
- Social objective:
 - To support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations
 - By fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.
- Environmental objective:
 - To protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution
 - Mitigating and adapting to climate change, including moving to a low carbon economy.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Economic objective:
 - Plan should make adequate provision for waste management infrastructure to ensure the growth of the waste economy.
- Social objective:
 - Plan should include policies and objectives to promote a circular economy and the delivery of green infrastructure, enhanced public rights of way or improved access to recreation as part of the development and restoration of waste sites.
- Environmental objective:
 - Plan should include policies and objectives to address the causes and impacts of climate change relating to waste development activity, including using opportunities arising from waste operations and reclamation activity to mitigate and adapt to climate change and to leave a positive legacy.

Implications for the IIA

- Economic objective:
 - Include a sustainability objective relating to strengthening the economy.
- Social objective:
 - Include a sustainability objective relating to health and well-being.
- Environmental objective:
 - Include a sustainability objective relating to climate change mitigation and adaptation, conservation of historic features, conservation and enhancement of the natural environment.

NPPW (2015)

Key objectives relevant to the WLWP

- The National Planning Policy for Waste was adopted in October 2014 and sets out the need for local authorities to:
 - Prepare local plans using a robust proportionate evidence base
 - Identify need for waste management facilities
 - Identify suitable sites and areas
 - Determine planning applications
 - Monitor and report
 - Take up in allocated sites and areas
 - Existing stock and changes in the stock of waste management facilities.
 - The amount of waste recycled, recovered or going for disposal

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Allocate sites and develop policies that take account of the National Planning Policy for Waste.

Implications for the IIA

- Include a sustainability objective relating to sustainable waste management.

DEFRA (2021): National Waste Management Plan for England

Key objectives relevant to the WLWP

- Provides an analysis of the current waste management situation in England and evaluates how it will support implementation of the objectives and provisions of the revised Waste Framework Directive.
- At the local authority level, the Waste Management Plan notes that waste planning authorities (county and unitary authorities in England) are responsible for producing local waste management plans that cover the land use planning aspect of waste management for their areas.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Allocate sites and develop policies that take account of the National Waste Management Plan.

Implications for the IIA

- Include a sustainability objective relating to sustainable waste management.

Resources and Waste Strategy for England (2018)

Key objectives relevant to the WLWP

- Sets out how to preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy in England.
- It identifies five strategic ambitions:
 - To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025;
 - To work towards eliminating food waste to landfill by 2030;

Appendix A **Review of relevant plans, policies and programmes**

- To eliminate avoidable plastic waste over the lifetime of the 25 Year Environment Plan;
- To double resource productivity by 2050; and
- To eliminate avoidable waste of all kinds by 2050.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Allocate sites and develop policies in line with the Resources and Waste Strategy.

Implications for the IIA

- Include a sustainability objective relating to sustainable waste management.

DCLG (2015): Planning Practice Guidance on Waste

Key objectives relevant to the WLWP

- Provides further information in support of the implementation of waste planning policy.
- At the local authority level, the Guidance outlines who is responsible for waste developments and which matters come within the scope of 'waste development'.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Allocate sites and develop policies that take account of the Planning Practice Guidance on Waste.

Implications for the IIA

- Include a sustainability objective relating to sustainable waste management.

MHCLG Planning Practice Guidance (2021)

Key objectives relevant to the WLWP

- The PPG documents provide guidance on the interpretation and implementation of the NPPF.
- Of particular relevance are:
 - Planning Practice Guidance on waste
 - Planning Practice Guidance on air quality
 - Planning Practice Guidance on climate change
 - Planning Practice Guidance on conserving and enhancing the historic environment
 - Planning Practice Guidance on ensuring the vitality of town centre
 - Planning Practice Guidance on flood risk and coastal change
 - Planning Practice Guidance on health and wellbeing
 - Planning Practice Guidance on local plans
 - Planning Practice Guidance on the natural environment
 - Planning Practice Guidance on noise
 - Planning Practice Guidance on light pollution
 - Planning Practice Guidance on open space, sports and recreation facilities, public rights of way and local green space
 - Planning Practice Guidance on rural housing
 - Planning Practice Guidance on renewable and low carbon energy
 - Planning Practice Guidance on water supply, wastewater and water quality

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Plan needs to be produced in accordance with the guidance outline in the NPPG.

Implications for the IIA

- The SA should be prepared in line with the NPPG.

DEFRA (2012): National Policy Statement for Waste Water

Key objectives relevant to the WLWP

- Sets out the proposed policy framework to inform planning decisions on applications for large waste water infrastructure projects.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Allocate sites and develop policies that take account of the National Policy Statement for Waste Water.

Implications for the IIA

- Include IIA objectives that relate to sustainable waste management and the protection of water quality.

DEFRA (2013): National Policy Statement for Hazardous Waste

Key objectives relevant to the WLWP

- Sets out the strategic need and justification of Government policy for the provision of national significant infrastructure for the management of hazardous waste.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Allocate sites and develop policies that take account of the National Policy Statement for Hazardous Waste.

Implications for the IIA

- Include IIA objectives that relate to sustainable waste management which will include hazardous waste.

HM Government (2013) Waste prevention programme for England: Prevention is better than cure – The role of waste prevention in moving to a more resource efficient economy

Key objectives relevant to the WLWP

- The aim of the Programme is to:
 - Improve the environment and protect human health by supporting a resource efficient economy, reducing the quantity and impact of waste produced whilst promoting sustainable economic growth.
 - Encourage businesses to contribute to a more sustainable economy by building waste reduction into design, offering alternative business models and delivering new and improved products and services.
 - Encourage a culture of valuing resources by making it easier for people and businesses to find out how to reduce their waste, to use products for longer, repair broken items, and enable reuse of items by others.
 - Help businesses recognise and act upon potential savings through better resource efficiency and preventing waste, to realise opportunities for growth.
 - Support action by central and local government, businesses and civil society to capitalise on these opportunities.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Policies should take account of the strategic measures in the Programme.

Implications for the IIA

- Include IIA objectives which seek to promote waste prevention.

HM Government (2009): The UK Low Carbon Transition Plan

Key objectives relevant to the WLWP

- The Plan plots how the UK will meet the 34 percent cut in emissions on 1990 levels by 2020.
- The Plan shows how reductions in the power sector and heavy industry; transport; homes and communities; workplaces and jobs; and farming, land and waste sectors could enable carbon budgets to 2022 to be met.

Key targets and indicators relevant to the WLWP

- The plan includes a 5-point Action Plan covering the following areas:
 - Protecting the public from immediate risk;
 - Preparing for the future;
 - Limiting the severity of future climate change through a new international climate agreement;
 - Building a low carbon UK;
 - Supporting individuals, communities and businesses to play their part.

Implications for the WLWP

- Plan should include policies that contribute towards achieving lower carbon emissions.

Implications for the IIA

- Objectives should reflect the aims set in the UK Low Carbon Transition Plan to reduce carbon emissions.

HM Government (2011): The Carbon Plan: Delivering our low carbon future

Key objectives relevant to the WLWP

- The Carbon Plan is a Government wide plan of action on climate change, including domestic and international activity.

Key targets and indicators relevant to the WLWP

- The plan includes a range of sectorial plans and targets including low carbon industry.

Implications for the WLWP

- Plan should include policies that contribute towards achieving lower carbon emissions such as:
 - Diverting waste from landfill by driving it up the waste hierarchy.
 - Using alternate or low emission transport options where viable.

Implications for the IIA

- Include a sustainability objective relating to reducing carbon emissions.

DECC (2009): The UK Renewable Energy Strategy

Key objectives relevant to the WLWP

- Increase our use of renewable electricity, heat and transport, and help tackle climate change.
- Build the UK low-carbon economy, promote energy security and take action against climate change.

Key targets and indicators relevant to the WLWP

- 15% of energy from renewable sources by 2020.
- Reducing UK CO2 emissions by 750 million tonnes by 2030.

Implications for the WLWP

- Ensure that site allocations and policies will support renewable energy provision including electricity, heat and transport.

Implications for the IIA

- Include a sustainability objective relating to increasing energy provided from renewable sources.

HM Government (2017) The Clean Growth Strategy

Key objectives relevant to the WLWP

- Under the Climate Change Act, the Government is required to publish a set of policies and proposals that will enable the legally-binding carbon budgets, on track to the 2050 target, to be met.
- The Clean Growth Strategy sets out a range of policies and proposals, as well as possible long-term pathways for UK emissions in two ways – by decreasing emissions and by increasing economic growth.

Key targets and indicators relevant to the WLWP

- The strategy covers the fourth and fifth carbon budgets, spanning 2023-2027 and 2028-2032, by when the UK must cut its greenhouse gas emissions to 57% below 1990 levels.

Implications for the WLWP

- Plan should support renewable energy provision including electricity, heat and transport.

Implications for the IIA

- Include a sustainability objective relating to promoting energy efficiency and the use of appropriate renewable or lower carbon energy sources on site.

DEFRA (2018): The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting— Making the Country Resilient to a Changing Climate

Key objectives relevant to the WLWP

- The report sets out visions for the following sectors:
 - People and the Built Environment – “to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change on buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to address the risks and make the most of the opportunities of a changing climate.”
 - Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate”.
 - Natural Environment – “the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides.”
 - Business and Industry – “UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change.”
 - Local Government – “Local government plays a central role in leading and supporting local places to become more resilient to a range of future risks and to be prepared for the opportunities from a changing climate.”

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Policies should take account of the aims of the Programme.

Implications for the IIA

- Include IIA objectives which seek to promote the implementation of adaptation measures to make the area more resilient to a changing climate.

DEFRA (2017): Groundwater Protection

Key objectives relevant to the WLWP

- To prevent pollution of groundwater.

Key targets and indicators relevant to the WLWP

- To meet Water Framework Directive requirements for groundwater quality.

Implications for the WLWP

- Plan should recognise the importance and vulnerability of groundwater resources and ensure that they are not detrimentally affected by waste development.

Implications for the IIA

- Include an objective to protect groundwater quality.

Environment Agency (2011): The National Flood and Coastal Erosion Risk Management Strategy for England

Key objectives relevant to the WLWP

- This Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities.
- The strategic aims and objectives of the Strategy are to:

Appendix A **Review of relevant plans, policies and programmes**

- “manage the risk to people and their property;
- Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national;
- Achieve environmental, social and economic benefits, consistent with the principles of sustainable development”.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Policies should seek to reduce and manage the risk of all types of flooding.

Implications for the IIA

- The IIA framework should include objectives which seek to reduce the risk and manage flooding sustainably.

DEFRA (2008) Future Water: The Government’s Water Strategy for England

Key objectives relevant to the WLWP

- Sets out how the Government want the water sector to look by 2030 and an outline of the steps which need to be taken to get there.
- The vision for 2030 is one where we, as a country have:
 - “improved the quality of our water environment and the ecology it supports, and continue to maintain high standards of drinking water quality from taps;
 - Sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface water;
 - Ensure a sustainable use of water resources, and implement fair, affordable and cost-reflective water charges;
 - Cut greenhouse gas emissions; and

- Embed continuous adaptation to climate change and other pressures across the water industry and water users”.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Policies should aim to contribute to the vision set out in this Strategy.

Implications for the IIA

- Include IIA objectives which seek to protect, manage and enhance the water environment and promote water management and efficiency.

Environment Agency (2009): Water for People and the Environment: Water Resources Strategy for England and Wales

Key objectives relevant to the WLWP

- The Strategy vision for water resource “is for there to be enough water for people and the environment, meeting legitimate needs”.
- Its aims include:
 - To manage water resource and protect the water environment from climate change.
 - Restore, protect, improve and value species and habitats that depend on water.
 - To contribute to sustainable development through good water management.
 - People to understand how water and the water environment contribute to their quality of life.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Policies should reflect the aims of the strategy where relevant.

Implications for the IIA

- Include IIA objective which seeks to promote water management and efficiency.

DEFRA (2009) Safeguarding our Soils: A Strategy for England

Key objectives relevant to the WLWP

- The vision is “by 2030, all England’s soils will be managed sustainability and degradation threats tackled successfully. This will improve the quality of England’s soils and safeguard their ability to provide essential services for future generations”.
- The Strategy highlights the areas for priority including:
 - Better protection for agricultural soils.
 - Protecting and enhancing stores of soil carbon.
 - Building the resilience of soils to a changing climate.
 - Preventing soil pollution.
 - Effective soil protection during construction and development.
 - Dealing with our legacy of contaminated land.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Ensure that site allocations and policies will help protect and enhance the quality of soils and seek to sustainably manage their quality for future generations.

Implications for the IIA

- Include IIA objective which seeks to safeguard and enhance the quality of soil.

DEFRA (2007): The Air Quality Strategy for England, Scotland, Wales and Northern Ireland

Key objectives relevant to the WLWP

- Make sure that everyone can enjoy a level of ambient air quality in public spaces, which poses no significant risk to health or quality of life.
- Render polluting emissions harmless.

Key targets and indicators relevant to the WLWP

- Sets air quality standards for 13 air pollutants.

Implications for the WLWP

- Develop policies that aim to meet the standards.

Implications for the IIA

- Include sustainability objectives to reduce pollution and protect and improve air quality.

DEFRA Clean Air Strategy 2019

Key objectives relevant to the WLWP

- The Clean Air Strategy 2019 sets out actions to improve air quality by reducing pollution from a wide range of sources. The Clean Air Strategy informs the detailed National Air Pollution Control Programme.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Ensure that site allocations and policies will contribute to maintaining and improving air quality.

Implications for the IIA

- Include sustainability objectives to protect and improve air quality.

DEFRA and DfT (2017): UK plan for tackling roadside nitrogen dioxide concentrations

Key objectives relevant to the WLWP

- The strategy aims to help local authorities by setting up a £225 million implementation fund, establishing a clear air fund and £100 million for retrofitting and new low emission buses.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Ensure that site allocations and policies will contribute to maintaining and improving air quality.

Implications for the IIA

- Include sustainability objectives to protect and improve air quality.

DEFRA (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services

Key objectives relevant to the WLWP

- The strategy aims to guide conservation efforts in England up to 2020 and move from a net biodiversity loss to gain. The strategy includes 22 priorities which include actions for the following sectors:

- Agriculture;
- Forestry;
- Planning and Development;
- Water Management;
- Marine Management;
- Fisheries;
- Air Pollution; and
- Invasive Non-Native Species.

Key targets and indicators relevant to the WLWP

- The strategy develops ambitious yet achievable goals for 2020 and 2050, based on Aichi Targets set at the Nagoya UN Biodiversity Summit in October 2010.

Implications for the WLWP

- Develop policies that promote conservation and enhancements of biodiversity and ensure that site allocations take account of the aims of the strategy.

Implications for the IIA

- Include sustainability objective that relates to biodiversity.

DEFRA (2011): Securing the Future: Delivering UK Sustainable Development Strategy

Key objectives relevant to the WLWP

- Enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life for future generations.
- There are 4 shared priorities:
 - sustainable consumption and production;
 - climate change and energy;

Appendix A **Review of relevant plans, policies and programmes**

- natural resource protection and environmental enhancement; and
- sustainable communities.

Key targets and indicators relevant to the WLWP

- Sets out indicators to give an overview of sustainable development and priority areas in the UK.
- They include 20 of the UK Framework indicators and a further 48 indicators related to the priority areas.

Implications for the WLWP

- Ensure that site allocations and policies meet the aims of the Sustainable Development Strategy.

Implications for the IIA

- Include sustainability objectives to cover the Strategy's shared priorities.

DoH (2010): Healthy Lives, Healthy People: our Strategy for public health in England

Key objectives relevant to the WLWP

- Protect the population from serious health threats; helping people live longer, healthier and more fulfilling lives; and improving the health of the poorest, fastest.
- Prioritise public health funding from within the overall NHS budget.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Ensure that site allocations and policies reflect the objectives of the strategy.

Implications for the IIA

- Include a sustainability objective relating to health and well-being.

DECC (2014): Community Energy Strategy

Key objectives relevant to the WLWP

- Sets out plans to promote and facilitate the planning and development of decentralised community energy initiatives in four main types of energy activity:
 - Generating energy (electricity or heat)
 - Reducing energy use (saving energy through energy efficiency and behaviour change)
 - Managing energy (balancing supply and demand)
 - Purchasing energy (collective purchasing or switching to save money on energy)

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Ensure that site allocations and policies will support community low carbon and renewable energy provision including electricity, heat and transport.

Implications for the IIA

- Include a sustainability objective relating to increasing energy provided from decentralised low carbon and renewable sources.

HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment

Key objectives relevant to the WLWP

- The 25 Year Environment Plan sets out government action to tackle a wide range of environmental pressures.
- The 25 Year Environment Plan identifies six areas around which action will be focused. These include:
 - Using and managing land sustainably.
 - Recovering nature and enhancing the beauty of landscapes.
 - Connecting people with the environment to improve health and wellbeing.
 - Increasing resource efficiency and reducing pollution and waste.
 - Securing clean, productive and biologically diverse seas and oceans.
 - Protecting and improving the global environment.

Key targets and indicators relevant to the WLWP

- The 25 Year Environment sets out ambitious goals to manage pressures on the environment in the UK, based on England's 159 National Character Areas and monitoring indicators.

Implications for the WLWP

- Develop policies that promote conservation and enhancements of the natural environment and ensure that site allocations take account of the goals of the Environment Plan.

Implications for the IIA

- Include sustainability objective that relates to the protection of the natural environment.

Our Waste, Our Resources: A strategy for England (2018)

Key objectives relevant to the WLWP

- The Strategy sets out how the Government will preserve stocks of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy.
- The strategy is framed by natural capital thinking and guided by two overarching objectives:
 - To maximise the value of resource use; and
 - To minimise waste and its impact on the environment.

Key targets and indicators relevant to the WLWP

- The Strategy seeks to contribute to the delivery of five strategic ambitions:
 - To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025;
 - To work towards eliminating food waste to landfill by 2030;
 - To eliminate avoidable¹⁵ plastic waste over the lifetime of the 25 Year Environment Plan;
 - To double resource productivity by 2050; and
 - To eliminate avoidable waste of all kinds by 2050.

Implications for the WLWP

- Develop policies that promote conservation and enhancements of the natural environment and ensure that site allocations take account of the goals of the Strategy.

Implications for the IIA

- Include sustainability objective that relates to the efficient use of resources.

British Energy Security Strategy (2022)

Key objectives relevant to the WLWP

- The Strategy sets out long-term targets for offshore wind, solar, hydrogen, and nuclear energy following the onset of conflict in Ukraine.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Ensure that site allocations and policies will support community low carbon and renewable energy provision.

Implications for the IIA

- Include sustainability objective that relates to renewable energy.

DLHC (2022) Flood risk and coastal guidance

Key objectives relevant to the WLWP

- This report advises how to take account of and address the risks associated with flooding and coastal change in the planning process.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Ensure that site allocations and policies will mitigate against flood risk.

Implications for the IIA

- Include sustainability objective that relates to mitigating and managing flood risk.

Environment Agency (2022) National Flood and Coastal Erosion Risk Management Strategy for England

Key objectives relevant to the WLWP

- The strategy outlines a series of measures risk management authorities must undertake to manage flood and coastal erosion risk.

Key targets and indicators relevant to the WLWP

- No targets or indicators.

Implications for the WLWP

- Ensure that site allocations and policies will mitigate against flood risk.

Implications for the IIA

- Include a sustainability objective that relates to mitigating and managing flood risk.

London

The London Plan (2021)

Key objectives relevant to the WLWP

- This spatial development strategy for London sets out an integrated economic, environmental, transport and social framework for London's development. As such it has a number of key objectives (policies) it seeks to achieve on waste:
 - To reduce waste as part of establishing a circular economy.
 - To achieve and maintain sufficient waste capacity such that London achieves self-sufficiency on waste management.
 - To safeguard and retain waste sites for waste management.

Key targets and indicators relevant to the WLWP

- The three objectives (representing three distinct policies within the London Plan) contain a number of commitments for the Mayor, Mayoral Development Corporations and Local Authorities. Key targets amongst these are:
 - ensure that there is zero biodegradable or recyclable waste to landfill by 2026.
 - meet or exceed the municipal waste recycling target of 65 per cent by 2030.
 - meet or exceed the targets for each of the following waste and material streams:
 - a) construction and demolition – 95 per cent reuse/recycling/recovery
 - b) excavation – 95 per cent beneficial use
 - the equivalent of 100 per cent of London’s waste should be managed within London (i.e. net self-sufficiency) by 2026.

Implications for the WLWP

- Include objectives for new and existing waste sites to promote circular economy practices as well as for circular economy practices to be supported through other activities that support resource conservation, re-use and recycling and reductions in waste going for disposal.
- Include objectives for full net self-sufficiency for waste management for the affected area.
- Include objectives to identify compensatory waste capacity where the loss of waste sites is possible.

Implications for the IIA

- The London Plan sets out a series of intentions for waste management policy, the design and operation of waste sites and the design and operation of all built developments in London. As such, it has a number of implications for the IIA on environmental, social and economic factors to be assessed. In particular, key implications from policies specifically aimed at waste policy and waste sites are to:

- Include objectives and site assessment criteria for waste facilities to be integrated with non-waste related development and provide other local benefits.
- Include objectives for achieving circular economy principles.
- Include objectives for renewable energy generation.
- Include objectives for greenhouse gas savings.
- Include objectives for reducing impact on amenity in surrounding areas to waste sites.
- Include objectives that support waste minimisation.
- Include objectives and site assessment criteria to ensure waste sites are developed in accessible locations.

London Environment Strategy (2022)

Key objectives relevant to the WLWP

- This strategy of the Greater London Authority has a range of environmental objectives including for London to become a ‘zero waste city’. This means that by 2026 no biodegradable or recyclable waste will be sent to landfill, and by 2030 65 per cent of London’s municipal waste will be recycled. It also aims for London boroughs, businesses and the waste industry to increase the availability of recycling facilities and services.

Key targets and indicators relevant to the WLWP

- By 2026 no biodegradable or recyclable waste will be sent to landfill.
- By 2030 65 per cent of London’s municipal waste will be recycled.
- By 2030 75 per cent minimum target for business waste recycling.

Implications for the WLWP

- Ensure a net zero waste capacity.
- Develop policies that support the creation of recycling facilities.

- Develop policies in relation to waste sites that support households and commercial entities to recycle (including reuse, repair, and remanufacturing services).

Implications for the IIA

- Include objectives and sites criteria that prioritise the movement of waste up the waste hierarchy and away from landfill

Climate Action Strategy 2020-2027 (2020)

Key objectives relevant to the WLWP

- The main objective of the Climate Action Strategy is for London to become a zero carbon city by 2050. This requires zero emissions from all transport and buildings, and any residual emissions in London to be offset.

Key targets and indicators relevant to the WLWP

- The London wide actions are:
 - 40% reduction in CO2 between 2018 and 2022
 - 50% reduction in CO2 between 2023 and 2027
 - Zero waste to landfill in 2026
 - 15% of demand for energy will be met by renewable and district heating sources
 - 60% reduction in CO2 between 2028 and 2032

Implications for the WLWP

- Consideration of policy to meet the requirement of zero waste to landfill across London by 2026.
- Consideration of policy to reduce emissions across the plan period.

Implications for the IIA

- Inclusion of a sustainability objective and site assessment criteria in relation to the reduction of CO2 and the complete diversion of waste from landfill by 2026

Local Nature Recovery Strategy (*Upcoming*)

The Greater London Authority is currently preparing a Local Nature Recovery Strategy for London. This is a new system of spatial biodiversity strategies that will involve all 33 of the London boroughs as well as its six neighbouring counties, including Essex. It will provide a statement of London's strategic biodiversity priorities and a fully updated and comprehensive spatial habitat map.

The strategy is intended to be completed in 2025.

Accessible London: Achieving an Inclusive Environment Supplementary Planning Guidance (2014)

Key objectives relevant to the WLWP

- The document makes reference to the separate Housing SPG for London which requires new housing developments to make communal facilities and any storage facilities for waste and recycling to be accessible to all residents, including children and wheelchair users.

Key targets and indicators relevant to the WLWP

- No indicators or targets above those in the London Plan.

Implications for the WLWP

- Consider the inclusion of policy in relation to accessible spaces

Implications for the IIA

- Inclusion of a sustainability objective and site assessment criteria for waste sites and their accessibility.

Optimising Site Capacity: A Design-led Approach LPG (2023)

Key objectives relevant to the WLWP

- The LPG provides guidance on delivering the requirements of London Plan policies:
 - Policy D1 London's form, character and capacity for growth – Part (B3)
 - Policy D3 Optimising site capacity through the design-led approach Policy
 - D4 Delivering good design
- The design capacity approach applies to all existing site allocations as well as any new sites that come forward for development.

Key targets and indicators relevant to the WLWP

- Use of the 'Indicative Capacity Toolkit'
- Indicators within the toolkit provide additional detail in relation to the London Plan, and do not set further targets.

Implications for the WLWP

- Consideration of policy and site allocations through use of the toolkit to determine suitable capacity of development on allocated waste sites and other new waste development.

Implications for the IIA

- Inclusion of objectives relating to site capacity, green infrastructure, SuDS, accessibility and heritage

Characterisation and Growth Strategy (2023)

Key objectives relevant to the WLWP

- The Characterisation and Growth Strategy guidance provides information on how to carry out a borough or neighbourhood-wide character

assessment (or study). This assessment should be used to inform a borough or neighbourhoods growth strategy, setting out how an area will change in the future. This includes identifying if and where there are locations where tall buildings may be appropriate.

Key targets and indicators relevant to the WLWP

- The Characterisation and Growth Strategy guidance relates to the implementation of London Plan polices:
 - Policy D1 London's form, character and capacity for growth
 - Policy D2 Infrastructure requirements for sustainable densities
 - Policy D3 Optimising site capacity through the design-led approach
 - Policy D9 Tall buildings
 - Policy HC1 Heritage conservation and growth
 - Policy SD9 (Part B) Town centres: Local partnerships and implementation

Implications for the WLWP

- Consideration of the location of waste sites in relation to the relevant Characterisation and Growth Study for each borough or neighbourhood.

Implications for the IIA

- Inclusion of objectives and site assessment criteria in relation to local characterisation and growth studies

Air Quality Positive (2023)

Key objectives relevant to the WLWP

- The Air Quality Positive approach is a process of identifying and implementing ways to push development beyond compliance with both the Air Quality Neutral benchmarks and the minimum requirements of an air quality assessment.

Key targets and indicators relevant to the WLWP

- Maximising improvements to air quality through consideration of design and layout, transport and energy.

Implications for the WLWP

- Consideration of policy to demonstrate a holistic approach to the improvement of air quality.

Implications for the IIA

- Inclusion of objectives and site assessment criteria to minimise effects on air quality.
- Inclusion of 'in combination' assessment in relation to effects on air quality.

Air Quality Neutral (2023)

Key objectives relevant to the WLWP

- To improve air quality by a reduction in emissions from the built environment.

Key targets and indicators relevant to the WLWP

- The document sets out a range of targets in relation to the emissions from heating or cooling buildings, and the effects of any trip rates associated with an individual development proposal.

Implications for the WLWP

- Consideration of site allocations in locations where trip rates will be reduced
- Consideration of policy in relation to energy from waste

Implications for the IIA

- Inclusion of objectives and site assessment criteria in relation to the reduction of emissions from waste facilities.

- Inclusion of objectives and site assessment criteria in relation to sustainable transport.

'Be Seen' energy monitoring guidance (2023)

Key objectives relevant to the WLWP

- The Be Seen energy monitoring guidance sets out a process of monitoring energy performance in development from planning through to 'as built' stages.

Key targets and indicators relevant to the WLWP

- Policy SI 2 of the London Plan.

Implications for the WLWP

- Consideration of policy to implement the requirement of new waste facilities to demonstrate energy performance.

Implications for the IIA

- Inclusion of objectives in relation to energy use and reduction in emissions

Circular Economy Statements (2022)

Key objectives relevant to the WLWP

- This document provides guidance for developers on producing Circular Economy Statements for new developments in London. Developers must produce statements on waste management from development and operational waste management plans should be produced as part of the Circular Economy Statements, satisfying the London Plan and London Environment Strategy (see above)

Key targets and indicators relevant to the WLWP

- As a guidance document for producing statements that show conformity with the London Plan Policy SI7 on Circular Economy and the London

Plan and London Environment Strategy (see above) more broadly, it does not contain new targets or indicators to meet.

Implications for the WLWP

- Consideration of policy in relation to the requirements and outputs of Circular Economy Statements.
- Consider the requirements of new types of waste facilities to meet demands in relation to the circular economy.

Implications for the IIA

- Inclusion of objectives in relation to the circular economy and waste minimisation.
- Inclusion of site assessment criteria in relation to waste sites needed to support the circular economy.

Energy Planning Guidance (2022)

Key objectives relevant to the WLWP

- This document provides Greater London Authority guidance on preparing energy assessments as part of planning applications. It provides some guidance for waste facilities that intend to produce fuel on maximising heat and power opportunities. The updated guidance confirms that all major developments in London must continue to meet the London Plan net zero carbon target by following the energy hierarchy (Policy SI 2), the heating hierarchy (Policy SI 3) and by maximising on-site carbon reductions.

Key targets and indicators relevant to the WLWP

- As a guidance document for producing statements that show conformity with the London Plan Policy SI7 on Circular Economy and the London Plan and London Environment Strategy (see above) more broadly, it does not contain new targets or indicators to meet.

Implications for the WLWP

- Major non-residential development is included within the scope of the guidance, including the requirement for non-carbon heating.
- Possible opportunities and demand for energy from waste facilities

Implications for the IIA

- Inclusion of objectives that take account of the requirement for carbon reduction within new waste developments

The Control of Dust and Emissions During Construction and Demolition (2014)

Key objectives relevant to the WLWP

- This document provides guidance on the control of dust and emissions during construction and demolition, responding to the requirements of the London Plan 2011. As such it does not provide new objectives relevant to the WLWP.

Key targets and indicators relevant to the WLWP

- This document provides guidance on the control of dust and emissions during construction and demolition, responding to the requirements of the London Plan 2011. As such it does not provide additional objectives relevant to the WLWP.

Implications for the WLWP

- Implications for all sites producing construction and demolitions wastes which may have an impact on waste streams

Implications for the IIA

- Include objectives for new or existing waste sites in relation to dust suppression and reduction of emissions

Whole Life-Cycle Carbon Assessments (2022)

Key objectives relevant to the WLWP

- This document provides guidance for explains how to prepare a Whole Life-Cycle Carbon (WLC) assessment in line with Policy SI2F of the London Plan 2021. As such it does not provide new objectives relevant to the WLWP.

Key targets and indicators relevant to the WLWP

- This document provides guidance for explains how to prepare a WLC assessment in line with Policy SI2F of the London Plan 2021. As such it does not provide new targets relevant to the WLWP.

Implications for the WLWP

- Consideration of WLC in relation to new or expanded waste sites.

Implications for the IIA

- Inclusion of WLC in objectives relating to climate change.

Sustainable Transport, Walking and Cycling LPG (2022)

Key objectives relevant to the WLWP

- This document provides guidance for plan-makers and developers on transport, walking and cycling in London, including the protection of planned schemes.

Key targets and indicators relevant to the WLWP

- None above the requirements of the London Plan.

Implications for the WLWP

- Consideration of the location new or expanded waste sites in relation to the effects on sustainable transport networks.

Implications for the IIA

- Inclusion of objectives and site assessment criteria relating to the impacts of waste sites on sustainable transport networks.

Urban Greening Factor (2023)

Key objectives relevant to the WLWP

- The Urban Greening Factor is a tool used to evaluate the quality and quantity of natural features proposed as part of a development application, such as planting, waterbodies, and green roofs, collectively referred to as urban greening. This document advises developers on how to meet these requirements under London Plan Policy G5 Urban Greening.

Key targets and indicators relevant to the WLWP

- The Urban Greening Factor tool sets out design considerations in relation to the natural and built environment and provides a score in terms of meeting the aims of policy G5 of the London Plan.

Implications for the WLWP

- Consideration of the location of waste sites in relation to Sites of Importance for Nature Conservation (SINC), the Public Realm and Sustainable Drainage Systems (SuDS), as well as the potential opportunities for biodiversity in relation to roofs and facades of buildings.

Implications for the IIA

- Inclusion of objectives and site assessment criteria relating to SINC, SuDS, and biodiversity gain.

London Sustainable Drainage Action Plan (2015)

Key objectives relevant to the WLWP

- This document is a long-term plan to coordinate the development of 'sustainable drainage' systems across London. The plan has been developed by the Drain London Programme, a partnership of the Mayor of

London, Environment Agency, London Boroughs and Thames Water. It sets out a range of actions for each major land-use sector including major utilities. As such, it makes very brief mention of some waste management sites likely being able to deliver SuDS cost-effectively.

Key targets and indicators relevant to the WLWP

- To achieve a 1% reduction in surface water flows in the sewer network each year for 25 years, resulting in a 25% reduction in flows by 2040.

Implications for the WLWP

- Consideration of policy and site allocations in relation to sustainable drainage within a London wide context.

Implications for the IIA

- Inclusion of objectives and site assessment criteria in relation to urban drainage

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