



West London Waste Plan

Issues and Options Consultation
Full report

September 2010

West London Waste Plan Issues and Options Consultation: Full Report

A report from **CAG Consultants**

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CAG CONSULTANTS
Gordon House
6 Lissenden Gardens
London NW5 1LX
Tel/fax 020 7482 8882
hq@cagconsult.co.uk
www.cagconsultants.co.uk

for direct enquiries about this report please contact:

Gerard Couper
tel 01364 653003 mob 07866 361111
gc@cagconsult.co.uk

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1. Introduction

1.1 This report

This report describes the responses received to the consultation carried out on the West London Waste Plan (WLWP) Issues & Options report. It is being published alongside the *Draft Consultation Document: Proposed Sites and Policies*. It incorporates and updates information included in the Issues and Options Consultation Summary report dated June 2009. It also includes the WLWP responses to individual consultation comments, not included in the Summary Report.

The first section outlines the consultation which has been carried out and the level of response received. Section 2 summarises the key issues arising from the consultation, and the responses to each of the consultation questions. It then describes how the views of consultees have been addressed in the Draft Plan. Section 3 lists consultation comments, and gives responses to these comments, where relevant showing how they have been addressed in the Draft Plan.

The consultation was conducted between October 2008 and March 2009. The consultation programme sought to explore views on key issues and options for the planning of West London's waste facilities up to 2026. Further public consultation on the *Draft Consultation Document: Proposed Sites and Policies* is planned to take place in early 2011. The results of this further consultation will then be reviewed and a submission version of the Plan finalised for publication in September or October 2011.

1.2 Summary of consultation

The West London Waste Plan will, once adopted, provide a framework of identified sites suitable for waste facilities and for meeting West London's future needs for the management of all waste streams and types. The West London Waste Plan will become part of the Local Development Framework of each of the local authorities involved.

Six west London Boroughs (Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames) have joined together to prepare the West London Waste Plan. They are employing [Mouchel](#) and [CAG Consultants](#) to help them develop the Plan, and to make sure that local people have their say.

The programme of consultation on the Issues & Options report included:



1. An information leaflet (front page shown) and poster, providing a brief introduction to the key issues, which was distributed by the six boroughs.
2. Articles on the consultation programme were published in each of the borough's newsletters.
3. Six workshops, one in each of the boroughs, incorporating facilitated discussion of some of the key issues and options. Residents and organisations on the consultation databases of the six boroughs' planning departments were invited to the workshops. The workshops were also advertised in local newspapers and a press release resulted in additional press coverage.
4. Copies of the Issues and Options report and associated technical reports were made available on the WLWP website (www.wlwp.net) and in Council offices and libraries across the six boroughs.
5. A questionnaire seeking responses on the issues and options was included within the Issues and Options report. An interactive electronic version of the questionnaire was also provided for completion online, and the questionnaires were also made available for download from the website.
6. The project team have also visited a small number of local groups and organisations to discuss the issues and options. The opportunity for such meetings was advertised via the project website and the workshops.
7. Written and email feedback was invited via the information leaflet and poster, project website and the workshops.

1.3 Level of response

Appendix A details the level of response received. In summary:

- 240 people attended the public meetings;
- 25 completed interactive forms have been received; and
- 83 other written responses including completed questionnaires have been received.

2. Summary of consultation comments

2.1 Key issues

The Draft Plan has taken in to account all of the responses received during the consultation, as described in this document. The table below summarises the key issues arising from the consultation responses along with an explanation of how they have been addressed in the development of the Plan.

Key issue	How these issues have been addressed in the Draft Plan
<p>General agreement to vision and strategic objectives, but more wanted on:</p> <ul style="list-style-type: none"> • Climate change/ emissions; and • Waste minimisation. 	<ul style="list-style-type: none"> • It is agreed that climate change is a key objective and it has been included in the Draft Plan. • The objective on waste minimisation has been enhanced, and it has been made clear that it applies to all waste streams, not just municipal waste. The role of the individual Boroughs in promoting waste minimisation is also described in the Plan.
<p>Concern that assumptions of waste forecast too pessimistic and waste collected actually going down in West London in last 5 years.</p>	<p>The London Plan predicts that overall waste will increase slightly, despite a recent reported reduction in municipal waste collected, and an increase in minimisation activities. It is understood that this is largely because of predicted population growth, i.e. that population growth will outstrip reduction arising from minimisation activities.</p> <p>In addition there are good reasons for over planning for provision, as to operate on the minimalist approach would leave the boroughs with insufficient flexibility to react to change in a relatively short period should this be necessary. The annual monitoring of the plan will prevent overprovision of sites occurring. In any event there should be little difficulty in translating land reserved for waste uses to other beneficial uses should this prove necessary.</p> <p>For these reasons, the Draft Plan provides sufficient sites to be sure of meeting its apportionment requirement in the London Plan. It currently provides for a total of 66ha, which includes contingency above the existing and proposed replacement London Plans.</p>

Key issue	How these issues have been addressed in the Draft Plan
<p>Support to go beyond apportionment (either to allow for contingency or to achieve some practical self sufficiency), but residents challenge need for provision if assumptions too pessimistic.</p>	<p>It is not considered necessary for west London to aim to achieve self-sufficiency, as the apportionment requirements aim to ultimately achieve self-sufficiency across London. If west London aims for self-sufficiency, there is a risk of overprovision, as there is no ability to control the movement of waste across London. However, as noted above, the amount of waste arising is predicted to increase despite improvements in waste minimisation. The Draft Plan therefore considers that the most practical option is to provide for apportionment plus some contingency. It identifies a longer list of sites than its exact requirement to give the Plan flexibility, should some sites not come forward for development.</p>
<p>Support to include provision for hazardous waste and construction, demolition and excavation (CDE) waste (but concern about on site recycling of latter).</p>	<ul style="list-style-type: none"> • The Draft Plan does not make specific provision for hazardous waste as it is not considered efficient to deal with hazardous wastes at a sub-regional (west London) Level, but rather at a regional (London) level. This is because hazardous waste usually requires specialised treatment facilities which need to be of a certain size to be viable. However, planning applications for hazardous waste facilities will be treated in the same way as applications for all waste management facilities and the capacity of hazardous waste facilities will be monitored closely to establish whether additional provision is required at a later date. • Whilst there was strong support to make a provision for construction, demolition and excavation wastes within the plan it is difficult to do so without suitable data on how much of this type of waste is produced within the area. The approach taken by the Draft Plan is to ensure more on-site recycling and re-use takes place by using Policy 4 whilst ensuring that boroughs monitor the types and capacities of waste management facilities developed against any new waste arising data that is produced. • The importance of enforcing on-site recycling of CDE waste is acknowledged. Policy 4 in the Draft Plan aims to deal with this issue.
<p>Support for London Plan location and site selection criteria but:</p> <ul style="list-style-type: none"> • Concern about suitability of some existing sites; and • Fear it could lead to uneven spread and no incentive to recycle in affluent areas. <p>In addition, many were against the use of the green belt for waste facilities, though some saw compatibility with processes like composting.</p>	<ul style="list-style-type: none"> • The Draft Plan lists existing sites, divided into treatment and transfer facilities. It identifies the existing waste transfer sites which are considered suitable for redevelopment. All other existing sites are considered to have constraints that will prevent their re-development. Constraints identified include, for example, the site area being too small for re-development, or the site being within a zone safeguarded for the Crossrail development. • The Plan is required by the London Plan to safeguard all existing sites. However, it is important to note that just because a site is safeguarded it does not automatically mean that planning permission for any waste management related activity of the site will be granted. Re-development of any site will still be subject to the relevant borough's development control processes and require permitting by the Environment Agency. Their suitability for

Key issue	How these issues have been addressed in the Draft Plan
	<p>redevelopment will be addressed through Policy 2 in the Draft Plan. Policy 2 also provides for the relocation of badly located, existing sites through the development process.</p> <ul style="list-style-type: none"> • In producing the list of sites in the Draft Plan, the distribution across west London, especially in terms of sustainable transport movements, has been taken into account. However, it has not been possible to achieve a uniform distribution due to the lack of availability of suitable sites in all areas. • London Plan policy is to avoid inappropriate development in the greenbelt. In the site review process, the impact on the surroundings of any potential sites in the Green Belt was carefully considered.
<p>Support for some specification of a range of technologies being suitable/ unsuitable for zoned sites.</p>	<p>The Draft Plan suggests that sites should be identified for general waste use and that the policies within the West London Waste Plan should be used to manage developments to ensure they are suitable for the site and its surrounding uses. This is because Plan needs to be flexible to allow for developments and improvements in waste management technologies and in the changing habits of consumers and waste producers.</p>
<p>Differing views with respect to incineration, but general support for energy from waste schemes.</p>	<p>The Draft Plan seeks to promote the management of waste in line with the waste hierarchy. As outlined in Policy 3, and in line with the London Plan, advanced energy from waste technologies such as gasification, pyrolysis and anaerobic digestion will be considered in preference to conventional incineration. The policy requires all waste facilities where practicable to contribute to combined heat and power or other forms of decentralised energy.</p> <p>Conventional incineration is defined as the controlled burning of waste in the presence of air to achieve complete combustion. Therefore, there is a difference between conventional incineration and other forms of incineration/advanced thermal treatment which recover energy from waste. Policy 3 says that energy from waste facilities will only be considered where it can be demonstrated that the facilities are a recovery facility as defined by the Waste Framework Directive. The Directive requires recovery facilities to meet minimum standards of energy efficiency and also covers gasification and pyrolysis in this category.</p>
<p>Support for a mix of large and small sites.</p>	<p>In reviewing potential sites for the Draft Plan, a large number of sites were assessed for suitability, and the result of this exercise has identified a range of sites from small to large.</p>
<p>Support for range of transport modes, but not all suitable in all 6 boroughs.</p>	<p>This is acknowledged and suitability has been assessed as part of the site assessment process.</p>

2.2 Responses to consultation questions

The following is an overview of the responses to the consultation, presented in the order of the 11 questions contained in the questionnaire, which was available in an interactive form¹, as a download, and as a paper copy. Five of these questions were discussed at the public meetings.

This section contains a summary of the key findings from the consultation in relation to the questions posed in the questionnaire. It includes charts which provide an overview of the views expressed in response to the eleven questions. However, it should be noted that:

- The charts in this report only include the responses received via completed questionnaires, interactive forms, email and letter which could be categorised according to the 11 questions. These responses are described as “respondents to the questionnaire” in this report.
- The numbers of people supporting or opposing particular options has not necessarily determined which options are chosen. Although the weight of different opinions has been an important consideration, decisions about the Plan have to take in to consideration the relative merit of all of the views expressed. The reasons for selecting the option chosen for the Draft Plan are discussed at the end of each question.

The details of individual responses can be found in section 3. This includes additional comments received by letter and email which did not relate to any of the eleven consultation questions.

Q1. Do you agree with the spatial vision and strategic objectives?

Summary of responses

Support for the spatial vision and strategic objectives outlined in the Issues and Options consultation document was generally positive, though a significant percentage (35%) did not address the question. However, 41% of the respondents to the questionnaire said they agreed with the vision and objectives, with 4% saying they disagreed. In addition, 20% did not say whether they disagreed but made specific comments. Some of the specific comments made were:

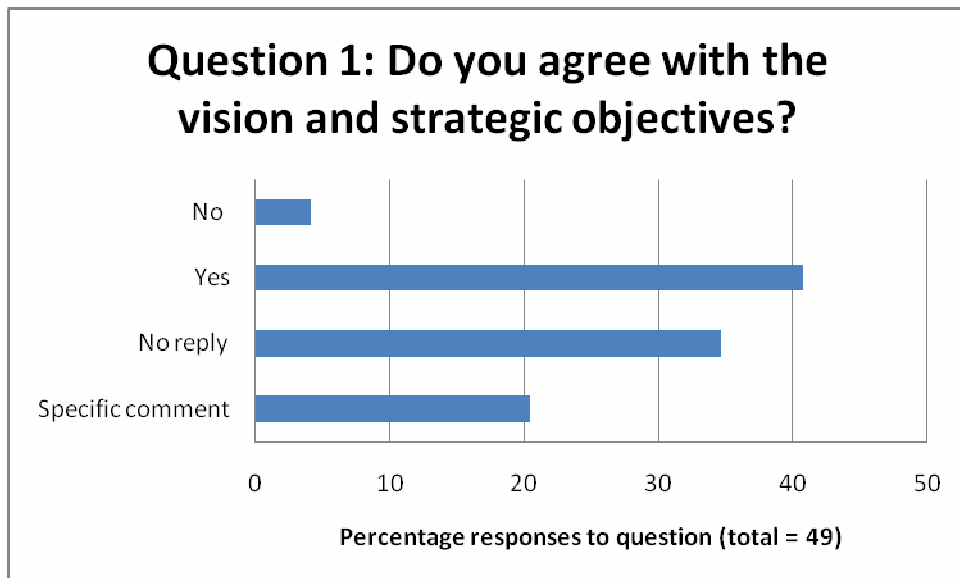
- Supporting economic growth and employment is too broad an objective;
- There is a need to mitigate against the impact on residents living in the immediate locality of any new waste development;

¹ Note that there was a minor variation in the numbering of the questions in the interactive questionnaire, which has been accounted for in collating the results. The numbering used here is that in the published form of the questionnaire.

- The minimisation of waste movement should include all types of waste, e.g. post-treatment waste such as ash; and
- Concerns regarding funding, accountability and control.

Other responses were generally supportive of the vision and strategic objectives. The two commercial waste operators questioned the viability of Objective 3 (that by 2015 only inert waste will end up in landfill). It was also pointed out that there may be a tension between national and regional waste policy in terms of the national policy of treating waste at the nearest appropriate location, and the London Plan’s desire for self sufficiency. There was a general call for a greater emphasis on waste reduction/ minimisation (and reducing associated greenhouse gas emissions), plus recognition that a step change in recycling and composting is needed (objective 4). It was noted that the GLA apportionment figure only ran to 2020, yet the Plan went through to 2026: in addition, there was a call to break down targets for 2010, 2015 and 2020. One response questioned the assumptions the Plan used to forecast future waste (‘a huge increase in waste over the next 10-15 years’) citing that the amount of waste dealt with by WLWA has actually decreased every year for the last five years. The Environment Agency pointed out that the need to include text to ensure flood risk is reduced. In terms of transport, there was support for use of water transport for waste, and a call from the Highways Authority to include reference to minimising the distance travelled by waste to meet the PPS12 test of soundness.

The chart below illustrates questionnaire responses.



How the comments are addressed in the Draft Plan

The objectives were revised, and now include waste minimisation and climate change as strategic priorities.

Q2. What other strategic objectives would you suggest, if any?

Summary of responses

The most commonly suggested additional strategic objective was the need to minimise environmental impacts with comments including air quality and the carbon footprint of waste transportation. The three other objectives that were raised by more than one of the participants completing the questionnaire were:

- The general need for waste reduction;
- Reduction of industrial and commercial waste; and
- Support for businesses to reduce waste production.

The other responses made similar points, particularly the need for an objective around reducing greenhouse gas emissions/ carbon footprint. Other suggestions included something on self-sufficiency and use of waterways for the movement of waste.

How the comments are addressed in the Draft Plan

The objectives were revised, and now include waste minimisation and climate change as strategic priorities.

Q3. Are there any other key policies the WLWP should address?

Summary of responses

Other key policies the WLWP should address identified by those completing the questionnaire included:

- Consideration of Local Development Framework policies;
- Environmental regulations, particularly those related to airborne emissions; and
- European Union regulations.

Other responses received made a strong case for including policies on climate change as a key policy driver for the waste Plan. It was considered that these should include national legislation, London Plan climate change policies (4A.6, 4A.7, 4A.8 and 4A.23), plus the relevant policies and strategies from the six boroughs themselves. One key issue was seen as the co-location of new waste facilities and decentralised energy schemes such as CHP and CCHP. There was also a call for addressing air quality policy in a similar vein. Other suggested policies included: water transport; air safety (in relation to bird flocks and flue heights); and including wastewater and sewage in the Plan citing the TCPA (Prescription of County Matters) Regulations 2003, PPS10 and London Plan policy 4A.18. One group made a plea for the Plan to aim higher than government targets.

How the comments are addressed in the Draft Plan

These policies are addressed throughout the objectives and policies of the Plan, though they have not been specifically listed in the document. Policy 2 in particular requires all waste proposals to meet a range of environmental requirements, while policy 3 encourages support for decentralised energy.

Q4. Should the WLWP provide just enough land to meet the waste tonnages apportioned through the London Plan or go beyond the target and identify sufficient land to manage even more of West London's waste within the WLWP area to become more self-sufficient?

The question

This question seeks responses to the issue of how self-sufficient west London should be in dealing with its waste, i.e. to what extent should the exporting of waste for treatment or disposal outside the area be reduced? Each borough in London has been allocated a certain tonnage of waste and the borough must find suitable sites for facilities to manage and process this waste. This allocation or 'apportionment' has been set by the Mayor as a result of a study on the suitability of each borough to host waste sites. In west London the six boroughs have pooled their apportionment. Three options were suggested:

Option 1 Make provision only for the quantity of waste apportioned to West London through the London Plan

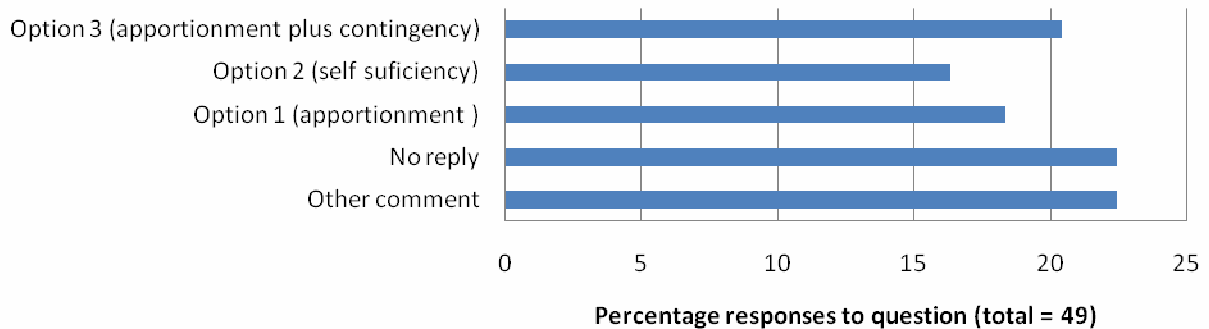
Option 2: Make more sites available to manage even more of West London's waste, being as self-sufficient as possible

Option 3: Make provision for the apportionment and some extra provision to allow for contingency

Summary of responses

There was a roughly equal split of support for the three options from respondents to the questionnaire (18%, 16% and 20% respectively). In addition 22% of questionnaire respondents made comments but did not specify which option they supported, and 22% did not reply to this question. Some of these other comments favoured the need for contingency/ flexibility, i.e. supported Options 2 and 3 (going beyond apportionment). A popular comment was 'to be as self sufficient as possible'. The chart below illustrates questionnaire responses.

Question 4: How much land should the WLWP provide to manage West London's Waste?



This question was also discussed at the public meetings, where there was a consensus for the principle of self-sufficiency. Moral, financial, climate change and other sustainability reasons were given for this. However, a point frequently made was to challenge the need for the provision of extra sites to meet self sufficiency. The Plan provides for extra sites based on a predicted increase in waste arisings. This predicted increase was frequently challenged at the meetings. A common point made was that this is “planning to fail” and that there is a need to give a strong priority to waste minimisation and reuse.

However it was acknowledged at four of the public meetings that self-sufficiency is an ideal and may not be practical, and in this case it was considered that the proximity principle should apply. This means that waste should be treated as close to west London as possible.

Extra provision for waste can include providing for hazardous waste and construction, demolition and excavation waste, which are not included within the apportionment requirements. These specific issues are discussed under questions 5 and 6.

How the comments are addressed in the Draft Plan

The consultation comments reflect a range of views, including support for self-sufficiency. However, the Draft Plan considers that the most practical option is to provide for apportionment plus some contingency. It identifies a longer list of sites than its exact requirement to give the Plan flexibility, should some sites not come forward for development.

Q 5. Should we account for hazardous waste when making provision for waste management facilities?

The question

The apportionment figure discussed above does not cover hazardous waste. This question asks about whether the Plan should provide sites for its management. The following options were suggested:

Option 1: Include capacity provision to manage hazardous waste arising

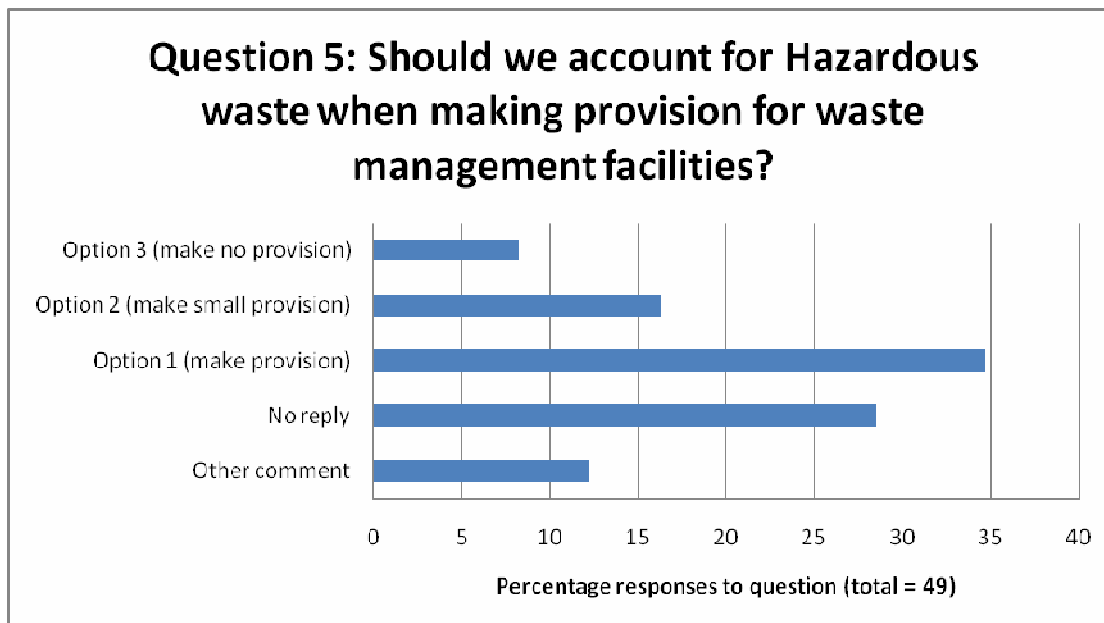
Option 2: Assume hazardous waste is managed elsewhere and make a small provision for what may need to be treated or disposed of

Option 3: Make no provision for hazardous wastes

Summary of responses

Although 29% of questionnaire respondents did not answer this question, there was support from those who did answer it for making some provision for hazardous waste in the WLWP. The data shows that a total of 14% of all respondents supported option 1, with 17% supporting option 2. Only 8% of respondents said that no provision should be made (option 3). A further 12% made specific comments but did not select an option.

Within the comments made, there was strong support for dealing with hazardous waste within West London (Option 1). These included GOL, the Highways Agency and GLA. The GLA recommending making provision for hazardous waste treatment plants to meet regional level waste management requirements (identifying suitable sites for the storage, treatment and reprocessing of certain hazardous waste streams). Exceptions were the Environment Agency, which supported Option 2 (where it was supported by proactive monitoring) and the WLWA who felt that the Plan should include policies on managing hazardous waste, but not allocate any land for hazardous waste facilities (stating that sub regional management of such waste is not efficient). The point was also made that if it were decided to deal with such waste on a wider scale outside of West London, then we would still need bulking facilities. The chart below illustrates questionnaire responses.



How the comments are addressed in the Draft Plan

The Draft Plan has considered the consultation comments. However, it has been decided not to make specific provision for hazardous waste as it is not considered efficient to deal with hazardous wastes at a sub-regional (west London) Level, but rather at a regional (London) level. This is because hazardous waste usually requires specialised treatment facilities which need to be of a certain size to be viable. However, planning applications for hazardous waste facilities will be treated in the same way as applications for all waste management facilities and the capacity of hazardous waste facilities will be monitored closely to establish whether additional provision is required at a later date.

Q 6. Should we account for Construction, Demolition and Excavation wastes when making provision for waste management facilities?

The question

The apportionment figure discussed above also does not cover construction, demolition and excavation (CD&E) waste. This question asks about whether the Plan should provide sites for its management. The following options were suggested:

Option 1: Include capacity provision to manage CD&E waste arising

Option 2: Assume CD&E waste is managed on site and therefore make a small provision for what may need to be disposed of

Option 3: No particular provision for CD&E wastes

Summary of responses

There was strong support for the inclusion of capacity provision to manage CD&E waste when making provision for waste management facilities from those who responded to the questionnaire. A total of 45% of respondents expressed their support for this option, and 12% supported making a small provision (option 2), while only 8% supported making no provision (option 3). Altogether 27% did not reply to this question, and 8% did not specify an option, but made specific comments.

There was a mixed response on this issue within the specific comments made, although the general feeling was that CD&E waste needed to be addressed by the Plan, i.e. either Option 1 or 2. Local provision was important due to the high impact of transporting this waste, neatly summed up by a Hounslow resident in the phrase 'do not transport further than required'. Both the EA and the GLA made the point that it is not always possible to manage this waste on site, questioning the assumption made in Option 2. Various respondents made reference to London Plan policy 4A.28 which seeks to address many of these issues (including on site treatment and movement by water where possible). The commercial waste operators differed slightly on this issue, one accepting the need to make some provision if the Plan's objective 3 is to be met (only inert waste to go to landfill by 2015), whereas the other advocated policies in the Plan to encourage on site management, rather than allocating any land. The lack of data on CD&E arisings was a problem in terms of making future provision.

The chart below illustrates questionnaire responses.



How the comments are addressed in the Draft Plan

Whilst there was strong support to make a provision for construction, demolition and excavation wastes within the plan it is difficult to do so without suitable data on how much of this type of waste is produced within the area. The approach taken by the

Draft Plan is to ensure more on-site recycling and re-use takes place by using Policy 4 whilst ensuring that boroughs monitor the types and capacities of waste management facilities developed against any new waste arising data that is produced.

Q 7. Do you think the site and location assessment criteria listed in paragraph 10.2, which are derived from PPS 10 and the London Plan, are sufficient for identifying capacity for waste management facilities within West London?

The question

The Issues and Options report listed location and site assessment criteria derived from PPS 10 and the London Plan. These are shown in the box below.

In identifying and assessing sites for waste management use Government advice, in the form of PPS 10, provides a clear set of expectations as to the range of issues that need to be considered in this process. These are summarised below:

- Physical and environmental constraints, including existing and proposed neighbouring land uses, such as protection of water resources, visual intrusion, nature conservation, traffic and access, air emissions, odours, etc.
- The cumulative effect of previous waste disposal facilities on the well being of the local community; and
- The capacity of the transport infrastructure.

The London Plan also identifies criteria for the selection of sites for waste management and disposal, as follows:

- Proximity to source of waste;
- The nature of the activity proposed and its scale;
- The environmental impact on surrounding areas, particularly noise, emissions, odour and visual impact, and impact on water resources;
- The full transport impact of all collection, transfer and disposal movements, particularly maximising the potential use of rail and water transport; and
- Prioritising using sites that are located on preferred industrial locations or existing waste management locations.

The questionnaire asked whether these were sufficient, giving the following 2 options:

Option 1: The location and site assessment criteria as specified in paragraph 10.2 above are sufficient

Option 2: The location and site assessment criteria as specified in paragraph 10.2 above alone are not sufficient and need to be developed to provide a more detailed set of criteria specific to West London

Summary of responses

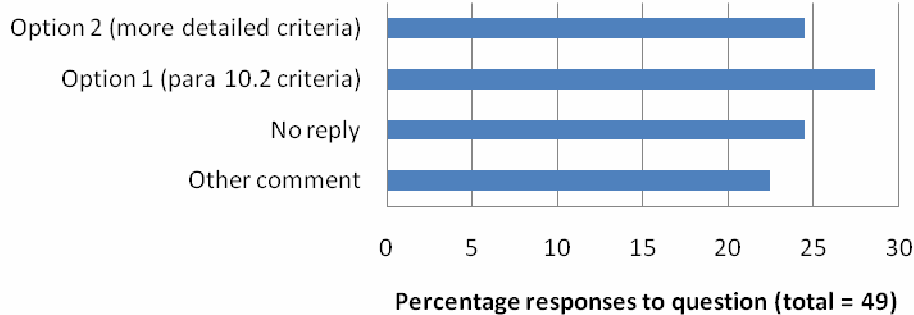
The responses of those who replied to the questionnaire are not conclusive on this issue, with slightly more (29%) supporting option 1 than option 2 (24%). In addition 24% did not reply to this question, and 22% did not specify an option, but made specific comments. Suggestions for other criteria included:

- Ensuring that recycling is a more attractive option than dumping waste, particularly for businesses;
- The adaptation of brownfield land and existing structures for use in waste management; and
- The need to ensure that the burden for waste management is shared across all boroughs.

Other comments contained a wealth of varied suggestions and detail. There was general support for the broad locations, especially existing sites and the idea that these could be redeveloped in some way in terms of waste requirements. Some felt that proximity to source is less important given the nature of the area, although proximity to markets may be an issue. The EA referred to the need to apply the PPS25 sequential test and Level 1 Strategic Flood Risk Assessment. Some respondents highlighted the CHP/CCHP issue of the need to locate next to receptors for waste heat (e.g. housing). A popular plea was to consider the whole transport journey of waste when looking at impact, including carbon emissions. Maximising rail and water transport was supported. For many residents and local groups, the need to protect residential amenity and emphasise more detailed social and environmental criteria were paramount. One group made the point that prioritising existing sites and preferred industrial locations would lead to an uneven spread of facilities, causing an increase in road transport and failing to tackle poor waste awareness in large parts of west London. One respondent stated that PPS10 did not preclude use of Green Belt for waste management.

The chart below illustrates questionnaire responses.

Question 7: are the para 10.2 criteria appropriate for selecting sites for waste management facilities?



The question was also discussed at the public meetings, which generally saw the London Plan broad location suggestions as a good starting point. There was considerable support for using existing sites and larger preferred industrial locations. There was little support for using smaller employment locations. Many people made the point that existing sites need to be assessed with caution as many had problems in terms of local impacts. Some preferred existing sites to be used for sorting, with industrial sites used more for processing, whilst others thought that converting existing transfer stations for processing may reduce the need for new land take and extra sites. In terms of location criteria, popular suggestions were: access (road, rail, water); impact on air quality (and AQMAs); avoidance of flood plain; avoidance of residential areas; and use positive criteria (e.g. creation of employment). There were differing views on whether the Green Belt was appropriate for waste facilities, whilst many were against the idea, some saw compatibility with processes like composting.

How the comments are addressed in the Draft Plan

The Draft Plan uses a number of sources of information to establish a list of potential sites, including London Plan criteria. A range of local criteria including distance from residential areas and routing of vehicles to sites were also considered. The sources were:

- Existing broad locations suggested in the London Plan;
- Local Employment and Opportunity Areas;
- Existing licensed waste management facilities;
- Sites suggested during public consultation; and

- Sites suggesting during the Call for Sites.

Q 8. How should we allocate sites with respect to the type of waste management activity taking place on each site?

The question

A mixture of different waste facilities will be required in west London during the Plan period. There may be concern about which types of facilities are allocated to which sites. If the Plan specifies particular facilities for particular sites, this will give clarity to residents and developers. On the other hand, it will reduce flexibility in managing waste in new ways in the future. The consultation sought views as to whether or not sites should be allocated for specific waste management technologies. Four options were suggested:

Option 1: Allocate specific technology types to specific sites

Option 2: Allocate sites for general waste use

Option 3: Allocate sites that are suitable for a given range of specified facility/technology types

Option 4: A combination of the above options so that some sites are specific for certain technologies and other sites will be suitable for a mixture of technologies

Summary of responses

There was very strong support for adopting a combination of the outlined options for the allocation of sites in order to ensure that some sites are identified for certain technologies, with other sites suitable for mixed technologies. The data showed 49% of those who responded to the consultation questionnaire expressed their support for such an approach (option 4). However, 31% did not answer the question.

Only 4% favoured option 1 (that sites should be allocated on the basis of whether they are suitable for a given range of specified facilities or technology types), whilst 8% favoured allocating specific technology types to specific sites (option 2). There were similar levels of support for the allocation of sites for general waste use with 8% of those responding to the questionnaire identifying this as their preferred option. The remaining 2% did not specify an option but made specific comments.

The comments made supported a degree of flexibility along the lines of Option 4, although one response supported total flexibility (Option 2). Again, there was opposition to incineration, especially near housing. The GLA noted that London Plan Policy 4A.23 (which deals with site selection criteria) makes no reference to technology-type, whilst Policy 4A.26 calls for boroughs to provide a range of facilities. The GLA does, however, demonstrate a preference for advanced conversion treatment technologies in Policy 4A.21. The GLA expressed support for opportunities for co-

location and local energy and heat use (thinking that this will result in a clustered/de-centralised distribution reducing transportation and maximising energy efficiencies) and the co-location of manufacturing from waste with waste management facilities, and renewable energy generation with waste management facilities.

The chart below illustrates questionnaire responses.



This question was also discussed at the public meetings. The prevailing view expressed at the meetings was for a degree of flexibility (especially in terms of not restricting technological innovation), but many suggesting a 'common sense filter' which would specify a range of appropriate technologies for a particular site, plus making it clear what would not be appropriate. However, there was support for the whole spectrum of 'specificity' options (even within individual meetings, e.g. Ealing). However, a popular view was that 'residents need to know what to expect'. The majority felt that incineration should be excluded, although the view was also expressed that everything should be considered. There was good support for CHP. Many people felt unqualified to make such judgements and many wanted more information about the various technologies and, more importantly, their impact on the local environment. There was a plea for someone to produce impact assessments on the various technologies to inform people in this respect. Other comments were: need to explore sharing resources with other boroughs (not just the 6); and a suggestion that the Plan should include a policy requiring state of the art waste minimisation and recycling facilities for all new major development.

How the comments are addressed in the Draft Plan

The Draft Plan identifies sites for general waste use only, as this is considered the best approach to provide flexibility. The approach suggested in the Draft Plan is to use the policies within the Plan to manage developments to ensure they are suitable for the site

and its surrounding uses. This will help the Plan to be flexible and allow for developments and improvements in waste management technologies and in the changing habits of consumers and waste producers. All proposed developments will have to submit a planning application which will be assessed in line with the West London Waste Plan and other borough plans and strategies and also public consultation.

Q 9. Which of the following options offers the best approach for maximising capacity of waste management facilities within West London?

The question

The consultation sought views on which approach would be best for determining the number, size and distribution of waste management facilities within west London. The following options were suggested:

Option 1: A centralised approach that relies on a fewer number of large facilities

Option 2: A de-centralised approach that is based on a larger number of smaller facilities

Option 3: A hybrid of these two approaches

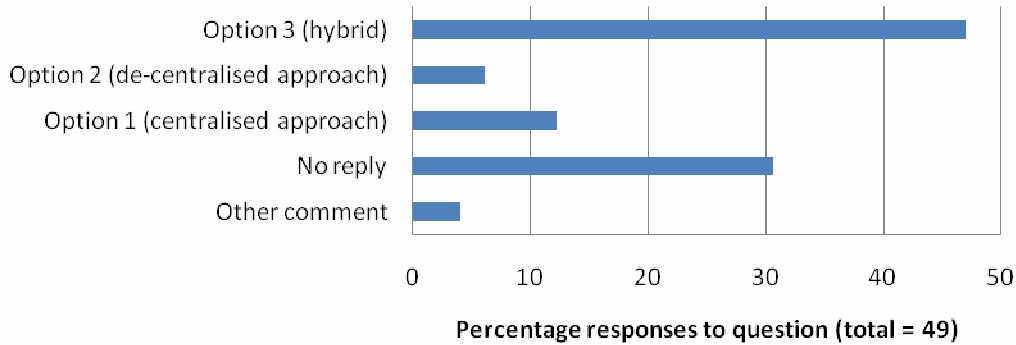
Summary of responses

There was strong support for the adoption of a hybrid of the two approaches from those who responded to the questionnaire, with 47% selecting this option. However, 31% of respondents did not reply to this question, 12% supported option 1 (a centralised approach), whilst only 6% supported the de-centralised option (option 2). The remaining 4% did not specify an option, but made specific comments.

Specific comments received showed strong support for the hybrid approach, Option 3 as it allows boroughs to tailor the approach best suited to their circumstances. It was noted that this option accorded with the London Plan and could reduce waste transport (Highways Agency). The GLA made a plea to ensure that when identifying existing capacity to meet the West London boroughs apportionment, the correct facility type is being included. For example Reuse and Recycling Centres do not count as management for waste apportionment in line with paragraph 4.71 page 230 of the London Plan. A new alternative option was also suggested, based on the identified need and capacity requirements for all waste streams.

The chart below illustrates questionnaire responses.

Question 9: Which option offers the best approach for maximising capacity of waste management facilities within west London?



This question was also discussed at the public meetings. The prevailing view at the meetings was for a mix of small and large, with many feeling that certain technologies would be suitable for certain sites (e.g. small sites near residential areas; larger sites in industrial areas). The next most popular view supported more, smaller facilities as these would encourage recycling and composting. A typical plea was to 'share the pain'. Many wanted more information in order to make a judgement.

How the comments are addressed in the Draft Plan

The Draft Plan adopts the hybrid approach of identifying sites ranging from larger sites suitable for collocation of one or more facilities through to smaller sites for smaller-scale facilities and local facilities.

Q 10. Which of the following five options provides the most suitable approach to the sustainable transport of waste within West London?

The question

The question examined the following 5 options for ensuring sustainable transport of waste in west London:

Option 1: Prioritise sites offering access through a range of the modes i.e. road, rail and navigable water

Option 2: Prioritise sites at locations allowing access to transport alternatives to road i.e. have wharves for water access and/or rail depots

Option 3: Prioritise sites at locations providing access just to main road networks

Option 4: Prioritise sites whose locations offer suitable access via any road networks

Option 5: Do nothing to encourage waste travel by any alternative transport methods

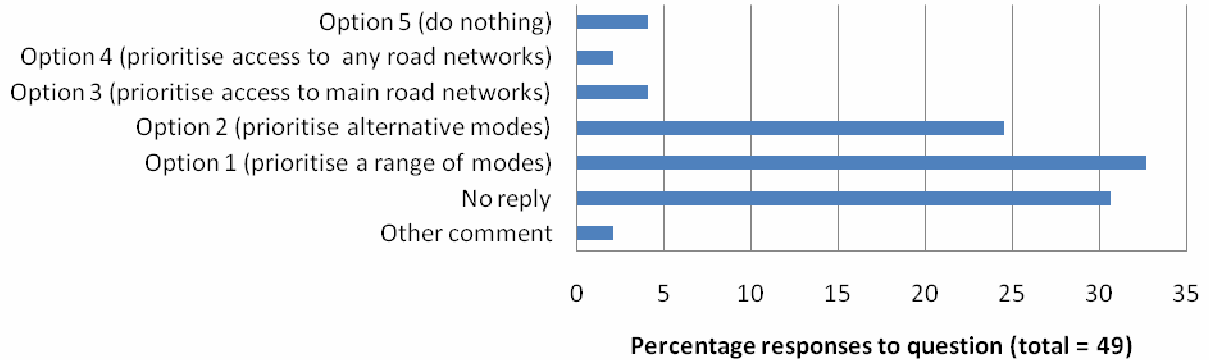
Summary of responses

There was strong support from those who responded to the questionnaire for the prioritisation of access through a range of transport modes (option 1), with 33% expressing their support. The prioritisation of access to transport alternatives to road (option 2) was supported by 24%, while 31% did not answer the question. Support for prioritising access to exclusively road networks (option 3) was very limited with only 4% of respondents supporting this option. Support for options 4 and 5 was also very limited at 2% and 4%. The remaining 2% did not specify an option but made specific comments.

In terms of specific comments received, the EA supported Option 2 as this would appear to offer sustainable options with a degree of flexibility. However, both the commercial waste operators favoured Option 4, as they saw the other options as potentially prejudicing existing waste management sites and areas identified in the London Plan that are otherwise acceptable for waste management development. The GLA commented that the WLWP must set clear policy to safeguard any sites that have access to sustainable transport modes: *'preference should be given to managing waste close to point of source. A location policy that minimises the number and volume of waste movement on the Transport for London Road Network or the Strategic Road Network should be one of the key aims. Consideration should be given to this factor in deciding where new facilities are located in accordance with London Plan Policy 4A.22 (Spatial Policies for Waste Management)'*. It was stated that TfL would not support the do nothing option (option 5) and would want to see sites prioritised that maximised the potential to use alternatives to road transport including water and rail. The Highways Agency recommended that the Plan should seek to promote transportation of waste by rail or waterborne modes wherever this may be possible, particularly to support the export of waste. It sought further evidence on existing capacity of the strategic road network or the implications of the Waste Plan proposals on the strategic road network, considering that the number, size and distribution of waste management facilities should be informed by this evidence base. It further stated that the absence of such an evidence base would mean that the Plan would not be in line with PPS12 soundness requirement that it is 'justified' (and recommended transport assessments and travel plans for individual developments).

The chart below illustrates questionnaire responses.

Question 10: what is the most suitable approach to the sustainable transport of waste within West London?



The question was also discussed at the public meetings. The prevailing view at the meetings was for waste to be transported using sustainable, non-polluting means but without prejudicing local residents. Whilst there was general support for all modes (including multi-modal sites), including road, rail and water (including canal), some modes were thought to be unsuitable in some boroughs. Rail capacity was thought to be limited in Harrow, Ealing and Richmond, and water use inappropriate for Richmond. The Hillingdon meeting made the point that not all roads will be suitable for the amount of traffic generated, citing possible appropriate roads in the Borough as being the A40, A25, M25, M4 and A4.

How the comments are addressed in the Draft Plan

The criteria used to select the sites in the Draft Plan give priority to a range of modes. Criteria included both:

- Proximity to the Transport for London Road Network and/or Strategic Road Network; and
- Proximity to sustainable transport options e.g. rail and water.

Q 11. Do you agree with the monitoring framework? If not please state why.

The question

The question asks for views on the monitoring framework set out in the Issues and Options report. The framework is shown in the box below.

While the final waste plan for West London will be monitored by each of the Boroughs through their Annual Monitoring Reports (AMRs) it is important to highlight certain waste indicators and targets to include in the WLWP. The following indicators, derived from the government's LDF Core Output Indicators (Update 2/2008) dated July 2008, are proposed:

1 W1: Capacity of new waste management facilities by waste planning authority

Purpose: To show the capacity and operational throughput of new waste management facilities as applicable.

Definition: Capacity and operational throughput can be measured as cubic metres or tonnes or litres, reflecting the particular requirements of different types of management. Different units of measure should be clearly highlighted in the reporting of this data. Management types are defined on page 31 of Planning for Sustainable Waste Management: Companion Guide to PPS10. These are consistent with those management types defined in the Standard Planning Application Form. New facilities are those which have planning permission and are operable within the reporting year.

2 W2: Amount of municipal waste arising, and managed by management type in each Waste Planning Authority (WPA) area

Purpose: To show the amount of municipal waste arising and how that is being managed by type.

Definition: Management type should use the categories that are consistent with those currently used by DEFRA in their collection of waste data. Total amounts of waste should be measured in tonnes.

In addition to national indicators we will establish a broader monitoring framework of local indicators based on:

- 1 Future Waste Policy Guidance;
- 2 Policy advice on proposals for new waste management facilities; and
- 3 Waste Development Planning Permissions.

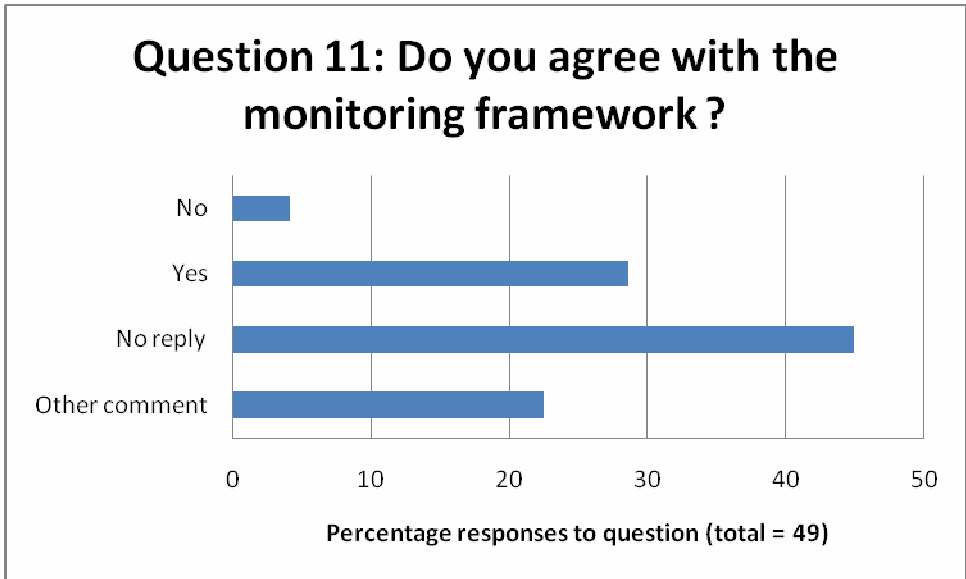
Summary of responses

Almost a half of those who responded to the questionnaire (45%) did not answer this question. However, 29% said they agreed with the monitoring framework, and only 4% said they disagreed. In addition, 22% did not say whether they agreed or disagreed, but made specific comments. There were a number of suggestions for improvement given which included:

- The addition of a measure of the energy efficiency of the types of waste management methods;
- The inclusion of the impact of waste handling on the environment, particularly air and water pollution; and
- The need to improve the way in which 'success' can be measured in order to improve the value of cost-benefit analysis.

Other specific comments generally supported the monitoring framework, with the exception of one group (SITA-UK) who saw it as too restrictive and thought that it should include all waste streams. Others recommended inclusion of C&I and CDE waste, as better data becomes available. Local groups recommended adding greenhouse gas/ carbon emissions to the framework.

The chart below illustrates questionnaire responses.



How the comments are addressed in the Draft Plan

The Draft Plan includes a list of proposed monitoring indicators, which reflects some of the consultation comments.

3. Responses to individual comments

This section contains responses to the comments received on each of the consultation questions. The response includes a description of how the issue has been dealt with in the Draft Plan, or why it has not been addressed, where relevant. As noted earlier the numbers of people supporting or opposing particular options has not necessarily determined which options are chosen. Although the weight of different opinions has been an important consideration, decisions about the Plan have to take in to consideration the relative merit of all of the views expressed.

Where a comment was simply support for one or other of the options, these have not been recorded here. These comments are captured in the charts in section 2.2.

Question 1: Do you agree with the spatial vision and strategic objectives?

Ref	Organisation	Q1 Consultation comments	WLWP response
1.1	Environment Agency	<p>The spatial vision: The plan should refer to requirements to meet statutory targets for waste diversion in 2010, 2013 and 2020 and say how it is envisaged that they will be treated within the JWDPD.</p> <p>Strategic objectives: Objective 4: suggest that a greater emphasis needs to be placed upon waste reduction/minimisation and re-use (this may happen through reference to other plans and policies on green procurement {London Plan} or joint working with the third sector for example).</p> <p>The strategic objectives lack any reference to the need to ensure flood risk is reduced.</p>	<p>It is not considered appropriate to refer to the waste diversion targets in the vision, as this is not the focus of the Plan.</p> <p>The objective on waste minimisation has been enhanced, and it has been made clear that it applies to all waste streams, not just municipal waste.</p> <p>Flood Risk has been addressed in the site assessment criteria and policy 2 in the Draft Plan.</p>
1.2	Friends of the Earth, Brent	<p>Shouldn't reducing the amount of waste generated be part of the vision?</p> <p>Not clear what the carbon footprint of waste refers to - whether it includes carbon emissions caused by its disposal as well as eg methane emissions from organic waste?</p>	<p>Waste minimisation has been included in the strategic objectives in the Draft Plan, as has reducing the impact on climate change. The phrase 'Carbon footprint of waste' includes emissions from disposal, but is not now used in the objective.</p>

Ref	Organisation	Q1 Consultation comments	WLWP response
1.3	Friends of the Earth, Richmond & Twickenham	<p>We do not think referring to “reducing [waste’s] carbon footprint” is enough – we suggest that the vision should include considerably reducing the greenhouse gas emissions caused by the disposal of West London’s waste.</p> <p>We understand the desire to refer to economic factors as part of the three components of sustainable development, but we think that “stimulating the economy” is a bit vague and would prefer to see reference to “encouraging sustainable enterprises that create local jobs and training opportunities” or similar.</p>	<p>Reducing the impact on climate change has now been included as a strategic objective.</p> <p>With regard to the suggested wording on the economy, this has not been addressed. It is considered that the suggested wording is outside the scope of the Plan.</p>
1.4	GLA	<p>However, the apportionment runs to 2020. The predicted growth in waste arisings was considered at the London Plan Early Alterations Examination in Public (EiP) and supported by the EiP Panel. The Early Alterations and Further Minor Alterations are founded upon this process. This view is clearly supported by PPS10 which states that there should be no need to reopen consideration of the principles of the London Plan or the annual rates of waste to be managed. As the Panel noted, changes in projections can be addressed through further reviews of the London Plan as a result of the plan, monitor, manage approach.</p>	<p>It is agreed that plan, monitor, review is a reasonable approach. Any future review of the WLWP will take account of any revised forecast for waste arisings.</p>
1.5	Greener Harrow	<p>Not fully. Doubtful if 7 should be a strategic objective. The WLWP must focus on waste related matters; it must employ people optimally (lowest cost) to support the waste activities - it is not a strategic objective to reduce unemployment by employing people. Similarly re supporting economic growth, the WLWP is not an engine of economic growth but has a requirement as an infrastructure service to be in line with the requirements of the local economy.</p>	<p>It is agreed that the WLWP is not an engine of economic growth. However, the Plan will support economic growth and employment by creating jobs optimally within the facilities themselves but also throughout the construction of such facilities, the servicing of facilities and potentially through development of end users of products.</p>
1.6	Hampton Society	<p>More substance required, less jargon</p>	<p>We have endeavoured to use plain English in writing the WLWP whilst keeping jargon to a minimum. We have also included a glossary of terms within the appendices.</p>
1.7	Heston Residents'	<p>Application of anaerobic digestion should be fully investigated.</p>	<p>The WLWP is a land use plan and as such will not be specifying or ruling out any technologies for specific sites. To maintain</p>

Ref	Organisation	Q1 Consultation comments	WLWP response
	Association	Incineration should not be discounted. Sensitive subject but full cost/revenue and H&S assessments should be made.	flexibility for developers it will also not specify the types and sizes of facilities suitable for each site and therefore it is difficult to conduct a meaningful cost/revenue analysis or H&S assessments. The draft WLWP policy 2 requires planning applications to be accompanied by full and detailed Environmental Impact Assessment.
1.8	Highways Agency, Network Operations SE	Support strategic objective 5. Strongly support objective 6. This objective should seek to minimise the distance travelled by waste, internalise trips within the West London area, and encourage the utilisation of sustainable transport options. This would help to ensure the impact of waste transportation on the SRN is minimised and would also ensure that the Plan is deliverable in transport terms, and therefore meets the PPS12 soundness requirement that it is 'effective'.	Sustainable transport is now addressed within strategic objective 3 in the Draft Plan.
1.9	K H Wembley Trust No. 2 (Completed by DP9 on their behalf)	The term 'right location' should be flexibly applied to reflect the changing land use characters. For instance, industrial fringe locations may become more residential in nature as a result of increasing demand for housing within west London. Such 'transitional' areas should be kept under review with respect to their suitability for the location of waste management facilities in view of potential increases in sensitive receptors. Strategic objectives in section 3.2, para 2, should also state that in addition to enhancing environmental quality, waste facilities should employ best practice techniques as an absolute minimum requirement. Additionally it should also state that councils should make every effort to be proactive rather than re-active when enforcing this.	The sites within the WLWP have been identified based on a range of assessment criteria. The sites have been drawn from suggested industrial areas from the London Plan, employment areas within each borough and sites suggested through consultation. The WLWP will be monitored annually and therefore kept under constant review. Draft Plan policy 2 outlines the requirements for all new waste facilities.
1.10	Natural England	No additional comments to those submitted re SA Scoping report at this time.	Noted.

Ref	Organisation	Q1 Consultation comments	WLWP response
1.11	Port of London Authority	<p>Pleased that there is a strategic objective which seeks to minimise the impact of transportation of waste. The use of the river for the transport of waste could play an important role in realising this objective. There is support at national and regional level for the transport of waste by water. The London Plan policy seeks for DPD policies to promote waste facilities that have good access to the Blue Ribbon Network and to identify sites and allocate land for waste management that maximises the potential use of water transport.</p>	<p>Access to sustainable transport options was used as one of a number of criteria for selecting the sites in the Draft Plan. This included access to navigable waterways and railheads.</p>
1.12	Richmond & Twickenham Friends of the Earth	<p>Objective 1- To provide “sufficient capacity”. The assumption of a huge increase in waste over the next 10-15 years may well be wrong. We note that the amount of municipal waste dealt with by the West London Waste Authority has decreased every year for the past 5 years from 854,000 tonnes (2003-4) to 773,000 tonnes (2007-8) (figures taken from the WLWA annual report 2007-8) and we expect this to continue to fall especially given that there is a recession at present. The figures for commercial and industrial waste are also likely to fall. Therefore we think that this objective needs qualifying to enable those implementing the Plan to work with the actual amount of waste that they think they are likely to need to manage rather than an imposed figure and suggest adding “and local needs” at the end of this objective.</p> <p>Objective 4. We think that this objective should refer to the need for a “large and rapid” increase in recycling and composting. Collection, sorting and bulking facilities for more different types of materials are needed if the amount of waste collected for disposal is to be further reduced. It is insufficient to provide a few bring sites and one civic amenity site in a Borough and expect all residents to save up everything that could be recycled but isn’t collected for a periodic visit to these sites.</p> <p>Objectives 5 and 8 We agree with these objectives but think that the knowledge that a lot of new waste facilities are being built may discourage waste minimisation by the public and businesses unless the West London Waste Authority and Boroughs also plan to increase the staff that they employ to work on waste minimisation issues.</p>	<p>See comments in section 2 above re waste minimisation. In terms of increasing the amount of recycling and composting, the aim of the WLWP is to provide the infrastructure to make this happen.</p>

Ref	Organisation	Q1 Consultation comments	WLWP response
1.13	SITA UK	<p>In principle we agree with the proposed spatial vision. It is appreciated that 2025 is the proposed term of the WLWP however in line with the aims of the WLWP and the London Plan there are interim targets to be achieved in 2010, 2015 and 2020.</p> <p>The vision to reduce the carbon footprint of West London is in principle appropriate given the concerns about climate change and greenhouse gases; however, it is considered that the supporting information in the WLWP consultation is insufficient to provide enough clarity and direction as to how this vision will be achieved through the plan.</p> <p>Strategic Objective 3. This objective should be revised because it is considered that it too ambitious and not realistic when considered against the fact that;</p> <ul style="list-style-type: none"> • The WLWP states that more than 70% of the areas municipal waste currently goes to landfill (predominantly outside the area); • The WLWP highlights there is a significant capacity gap in existing treatment capacity and what is required to achieve the apportionment targets set by the London Plan by 2015; • The need to allow an appropriate lead in time to develop new facilities. <p>Furthermore, it does not reflect the waste hierarchy, which recognises a need for provision for disposal for residual wastes (for all waste streams). The objective should be reviewed once the management options for all waste streams have been considered, including residual wastes for all waste streams and hazardous wastes, for example, asbestos.</p>	<p>The vision should be aspirational and the objectives should support that vision but the key is to set appropriate targets and to monitor progress in achieving each, revisiting the Plan where necessary over its life – ‘plan, monitor & review’. The vision and objectives have now been revised to concentrate on the need to meet apportionment requirements as well as supporting waste minimisation and reducing carbon emissions.</p>
1.14	WLWA	<p>WLWA generally support the strategic objectives of the WLWP with the following exceptions:</p> <ul style="list-style-type: none"> • There is some conflict between national policies on waste and the current London Plan. PPS10 requires regional 	<p>The Draft Plan is required to meet the requirements of the London Plan. The Draft Plan takes account of the current London Plan and the Draft Replacement London Plan. In response to other specific points:</p>

Ref	Organisation	Q1 Consultation comments	WLWP response
		<p>planning bodies to “enable waste to be disposed of in one of the nearest appropriate locations”. However, the current London Plan places undue and restrictive emphasis on regional self sufficiency.</p> <ul style="list-style-type: none"> • The level of emphasis placed on new technologies within the London Plan does not sit with the need to ensure that sufficient capacity is available to treat residual waste. • The projection in the London Plan for numbers and types of facilities to be built will be difficult to deliver and should be reviewed. <p>WLWP would be better reflecting national policy than London Plan policy especially as London Plan being reviewed.</p> <p>Whilst the presumption against landfilling of residual waste is supported the timescale of 2015 may be unrealistic, the objective should also be amended to recognise that most treatment processes produce some residual waste that needs to be landfilled and it may not all be inert waste. National policy as envisaged via the WET Act recognises that landfilling of waste will remain as a legitimate means of disposing of some municipal waste for the foreseeable future.</p>	<ul style="list-style-type: none"> • PPS10 also requires ‘a framework in which communities take more responsibility for their own waste;’ • New technologies can also be used to treat residual wastes; and • The target for landfilling of waste was removed, as it was not considered to be realistic.
1.15	Online Questionnaire	Supporting economic growth and employment is too broad an objective; the waste plan should focus on specifics.	It is necessary for the WLWP to offer flexibility to developers, therefore encouraging development and economic growth. It is difficult to be specific about employment at this stage. The Draft Plan actively promotes the use of combined, heat and power and other decentralised energy technologies, which are seen by most economists to be a growth sector, one of very few in industry in west London.
1.16	Online Questionnaire	I agree in principle but query funding, accountability and control (not via Europe or Whitehall).	The main method of accountability and control is through the planning system. See next answer re funding.
1.17	Online	However the minimisation of the movement of waste should include ALL waste such as post-treatment waste (e.g. ash).	The WLWP is a land use plan and is therefore not directly involved in the funding mechanisms used for the procurement

Ref	Organisation	Q1 Consultation comments	WLWP response
	Questionnaire	Also, long-term economic sustainability is an issue. PPP/PFI arrangements are a massive inflexible financial liability for the future and should therefore be avoided.	of long-term contracts by the waste disposal or waste collection authorities. However, there is significant money in waste management and proposals for the provision of new waste management facilities will come forward from the private sector supported by WLWA.
1.18	Online Questionnaire	Waste reduction should be a major objective to reduce the number and size of handling plants needed. This includes working with manufacturers and others to produce products and packaging that are easy to recycle.	The Draft Plan now includes a strategic objective on waste minimisation. However, working directly with manufacturers is outside the scope of the Plan.
	Online Questionnaire	Generally yes, but 'enough' sounds grudging and tautological if the Plan provides for sustainable management of waste. Don't know what 'improving the social environment' means - may be better deleted.	It is considered that "enough" is a useful word in this context, where it refers to providing the appropriate number of sites. Wording on the social environment has been removed, and replaced with a reference to the needs of west London's communities. This includes taking account of social issues such as health and safety and waste-related crime. The provision of adequate facilities for waste is likely to contribute to reducing fly-tipping for example.
1.19	Online Questionnaire	Except where National/London Policies conflict with local objectives as laid out above.	Agreed.
1.20	Online questionnaire	I do not agree that more waste management should be located in areas which already have these facilities of one sort or another. Alternative sites should be located so that particular areas (particularly residential) do not take the burden of this.	In choosing the sites listed in the Draft Plan, priority was given to choosing sites away from residential areas, schools and hospitals. In addition, the aim was to ensure the distribution of waste sites across west London. However, it has not been possible to ensure a totally even distribution, as suitable sites are not available to achieve this.
1.21	Online questionnaire	Not if it ends up right on my door step.	Concerns noted; see comments above (1.20)
1.22	Online questionnaire	The objectives may go some way to satisfy the needs of the West London Waste Plan but there is no clear operative to support and protect the needs of the very local residents that	Concerns noted; see comments above (1.20).

Ref	Organisation	Q1 Consultation comments	WLWP response
		would possibly suffer as a consequence opportunities present themselves.	
1.23	Online questionnaire	This is a talking shop. It will achieve little. Streamlined work with fewer people doing more work is what we want in a recession.	The WLWP will ensure that provision of waste facilities is appropriately planned, and this will contribute to the efficient operation of the local economy.

Question 2: What other strategic objectives, if any, would you suggest?

Ref	Organisation	Q2 Consultation comments	WLWP response
2.1	Friends of the Earth, Brent	Replace "To promote waste hierarchy" with "To work with boroughs to collect as many recyclable materials as possible and to encourage domestic and local composting or other schemes for dealing with organic waste." Reduction of emissions should be a strategic objective.	The Plan relates to the provision of waste management sites and does not deal with recycling and composting schemes directly. These are covered by local boroughs' waste management strategies. It is considered that is important to include the waste hierarchy here, as a key element of national policy on waste. In terms of emissions, objective 3 now addresses the issue of carbon emissions, and objective 4 addresses the overarching issue of impacts on the local community and environment.
2.2	Friends of the Earth, Hillingdon	Add in "To try to achieve self sufficiency in the management and treatment of waste.	Self-sufficiency is an issue that is dealt with in question 4.
2.3	Greener Harrow	Reduction of primary waste; the strategy focuses on handling the waste post generation. The critical mass of the 6 London Boroughs should be able to influence the generators of waste (e.g. supermarkets, other wholesale & retail outlets) so that there is a meaningful reduction in the predicted amount generated which is to be handled by the WLWP. Once facilities are constructed there is no incentive to minimise use - in fact financial incentive will be to maximise use which only encourages waste production! Incentivise negative waste i.e. pay not to produce waste - this may be a more cost effective, sustainable option than capex etc. for new technology facilities (which may not work)?	The reduction of primary waste is the first priority of the waste hierarchy. Waste minimisation has now specifically been included in the Draft Plan's objectives. However, the ability of this document to influence the producers is limited.
2.4	Hampton Society	Attention to costs.	The cost of provision is an issue which is dealt with by the West London Waste Authority for municipal wastes and

Ref	Organisation	Q2 Consultation comments	WLWP response
			developers for all other wastes. It is not something this Plan can influence.
2.5	Richmond & Twickenham Friends of the Earth	Objective 2. This objective should state that a reduction in greenhouse gas emissions is a strategic objective.	Has now been added as objective 3.
2.6	Online questionnaire	Attempt to persuade retailers/ suppliers to reduce/ remove packaging before supply.	This is one of the tenets of the waste hierarchy however there is only so much that the waste plan can do towards this.
2.7	Online questionnaire	To keep businesses in West London informed of changes in legislation. To encourage businesses to share best practice. To inform businesses about cost/benefit analysis. With the current economic situation businesses are recycling at a cost. With rebates not being provided recycling is being stored in order to reduce the no of uplifts requested resulting in shortage of space.	These are important objectives, but not a key objective for the plan.
2.8	Online questionnaire	To include commercial and industrial waste fully into this plan to ensure that the domestic sector does not bear the brunt of the work of recycling whilst commercial waste producers continue to send waste to landfill.	The WLWP is a land use plan for the management of ALL wastes including commercial and industrial wastes.
2.9	Online questionnaire	Self-funding. The re-sale/use of recycled waste materials should contribute and ultimately pay waste collection and disposal costs.	The WLWP is a land use plan and therefore not directly involved in the funding mechanisms used for the collection and treatment of wastes
2.10	Online questionnaire	Minimising noise and air pollution associated with waste handling operations.	This is now encompassed by objective 4 in the Draft Plan, as well as being specifically addressed by policy 2. .
2.11	Online questionnaire	Yes to encourage the community to do their bit, but I would like to see the incentives early on in the planning stage to motivate people to get involved. Also a campaign in local areas to promote recycling and to even get them involved at committee stage to represent their area.	Some of the issues are outside the scope of the Plan. Promoting recycling is an issue that is addressed by individual boroughs and by the West London Waste Authority.
2.12	Online questionnaire	Reduction of commercial and industrial waste, and financial incentives for companies to recycle properly.	See comments in section 2 above about paying more attention to waste minimisation in the Plan. Unfortunately the ability of this document to influence the producers is limited.
2.13	Online questionnaire	An objective aimed specifically at reducing carbon footprint.	Objective 3 in the Draft Plan now addresses carbon impacts.

Ref	Organisation	Q2 Consultation comments	WLWP response
2.14	Online questionnaire	I think there should be more emphasis on working with businesses in the area as they produce a higher volume of waste than residents. Offer them support and advice.	See comments in section 2 above about paying more attention to waste minimisation in the Plan. Unfortunately the ability of this document to influence the producers is limited.
2.15	Online questionnaire	To support education and child development.	It is not considered that this is an objective of the Plan.
2.16	Online questionnaire	Minimising carbon footprint of waste transportation.	Objective 3 in the Draft Plan now addresses carbon impacts.
2.17	Online questionnaire	Local Councils need to be able to use local (pollution free) incinerators	The aim of the Plan is to provide local facilities for waste management. See comments in section 2 above regarding incineration.
2.18	Online questionnaire	Waste management should be shared and dealt with in all boroughs of West London and not only in the poorer areas of west London. Affluent areas need to share burden	The distribution of waste sites across west London, especially in terms of sustainable transport movements, has been taken into account in choosing the sites listed in the Draft Plan. However, it has not been possible to achieve a uniform distribution due to the lack of availability of suitable sites in all areas.

Question 3: Are there any other key policies the WLWP should address in respect of waste?

Ref	Source	Q3 Consultation comments	WLWP response
3.1	British Waterways London	<ul style="list-style-type: none"> Waterways & Development Plans (British Waterways 2003) highlights the reference to freight under paragraph 45 of PPG 13: Transport. Waterways for Tomorrow (DETR 2000) set out the Government's wish to "promote the inland waterways, encouraging a modern, integrated and sustainable approach to their use. We want to protect and conserve an important part of our national heritage. At the same time, we want to maximise the opportunities the waterways offer for leisure and recreation; as a catalyst for urban and rural regeneration; for education; and for freight transport." The document highlights the scope to increase the amount of freight carried on the inland Waterways and the Government's wish to encourage the 	The potential for using water-based transport has been included in the criteria used for selecting the sites in the Draft Plan.

Ref	Source	Q3 Consultation comments	WLWP response
		<p>transfer of freight from roads to waterborne transport.</p> <ul style="list-style-type: none"> Planning a future for the Inland Waterways (Inland Waterways Amenity Advisory Council 2001) 	
3.2	Defence Estates	<p>Whether new waste facilities, particularly compost facilities, attract flocking or large numbers of birds which can be dangerous for air traffic control.</p> <p>Also concern about height of flue stacks from EfW facilities and possible infringement on aerodrome height criteria for air safety.</p>	Aerodrome height criteria have been included in the criteria used for selecting the sites in the Draft Plan.
3.3	Friends of the Earth, Brent	Seek to manage waste in accordance with the six boroughs' climate change policies/strategies and where relevant their UDPs or LDFs.	The WLWP will be part of each borough's LDF and therefore in accordance with other strategies, policies and plans.
3.4	Friends of the Earth, Richmond & Twickenham	The Plan should address climate change and air quality legislation and policies and consider the impacts that its disposal choices, especially technologies and transport, will have.	Objective 3 in the Draft Plan now addresses carbon impacts This is carried forward to specific policies which encourage CHP and other forms of decentralised energy production, as well as sustainable transport.
3.5	GLA	Consideration should be given to the London Plan policies 4A.6, 4A.7, 4A.8, and 4A.23 on climate change and the co-location of new waste facilities and decentralised energy systems such as combined heat and power and CCHP. Such consideration should be given when devising the criteria for assessing suitable sites and technology for resource recovery. Any energy that is recovered from biological waste can be regarded as renewable energy and there are many ways of combining waste disposal with energy recovery. There are a number of well established advanced technologies that are available for generating heat and power from wastes. These technologies have the potential to increase the efficiency of energy recovery. Opportunities for local energy and heat use should be favoured and their positioning in relation to existing and potential heat networks (as identified in policy 4A.5) of the London Plan) should be considered for any waste to energy plant or any waste facilities where co-location of waste to energy would be beneficial.	See above. Co-location and CHP/CCHP potential of facilities/sites has been specifically addressed by policy 3.
3.6	GOL	<p>Strongly support site and location assessment criteria being included.</p> <p>We consider that to demonstrate consistency between the documents of each Borough it is important to include</p>	Criteria for determining planning applications are outlined in the policies in the Draft Plan.

Ref	Source	Q3 Consultation comments	WLWP response
		development management policies setting out criteria to be used for selecting sites. In addition to ensuring consistency this is preferable because delays in the production of borough Core Strategies in several of the constituent boroughs will have a knock on effect in bringing forward these important policies in subordinate Development Management DPDs. If the DPD provides common development management policies, the Plan would be better able to demonstrate a fully holistic approach across the boroughs, make a clearer statement on implementation and more adequately demonstrate compliance with the EU Waste Framework Directive. There would also be a clearer framework for boroughs receiving applications on unallocated sites. Criteria from PPS10 Annex E and the London Plan can form the starting point for assessing applications on unallocated sites.	
3.7	Greener Harrow	Primary Waste minimisation policies. Requirements for retail outlets to take back "broken" white and grey goods. Increase in domestic hazardous waste e.g. CFLs, batteries.	See comments in section 2 above about paying more attention to waste minimisation in the Plan.
3.8	Hampton Society	Costs.	As noted above the cost of provision is an issue which is dealt with by the West London Waste Authority for municipal wastes and developers for all other wastes. It is not something this Plan can influence.
3.9	Port of London Authority	The info in the online appendices only relates to European and National Policy and not Regional Policy as set out in the London Plan. No information is provided for example on the criteria for the selection of sites for waste management and disposal (policy 4A.23), the broad locations suitable for recycling and waste treatment facilities (policy 4A.27) and construction, excavation and demolition waste (policy 4A.28).	The criteria for the selection of waste sites is outlined in the Draft Plan.
3.10	Teddington Society	<u>Page 12. 4.3.</u> We do not feel that government targets are high enough. The WLWP should be aiming much higher.	The purpose of the Plan is to propose sites for waste management to meet the requirements of the London Plan. This includes targets for managing waste within London. The targets discussed in 4.3 in the consultation document are outside the scope of this Plan and are dealt with by the West London Waste Authority.

Ref	Source	Q3 Consultation comments	WLWP response
3.11	Thames Water Property Services	<p>The Plan should cover wastewater and sewage waste and help to deliver the requisite wastewater and sewage sludge treatment infrastructure.</p> <p>The Councils' support in the provision of infrastructure to serve growth or to meet tighter environment standards would be welcomed.</p> <p>Sewage treatment plant facilities are a Waste Planning Authority responsibility as set out in the Town and Country Planning (Prescription of County Matters) Regulations 2003 which are referred to in Annex A of PPS10. It is therefore considered that they should be planned for in the Waste Authority Plan and in our experience County Planning Authorities do include policies on waste water/sewage treatment in their Waste Development Frameworks in addition to infrastructure requirement policies in the LDF Core Strategies. (Example Adopted Surrey Waste Plan 2008 Policy WD6 provided).</p> <p>The consolidated London Plan as published in February 2008 does include a requirement for sewage treatment plant facilities to be planned for by local authorities under Policy 4A.18: Water and sewerage infrastructure.</p> <p>Policy 4A.18 also sets out the Mayor will work with Thames Water, the Environment Agency and other relevant organisations to ensure that London's drainage and sewerage infrastructure is sustainable and meets the requirements placed upon it by population growth and climate change. The policy goes onto state that additional capacity for the management of sewage sludge will be needed over the plan period to meet the requirements of growth and tighter environmental standards.</p> <p>The capacity to manage sewage sludge in an appropriate and sustainable manner has been reviewed by Thames Water in the form of a new Sludge Strategy. The Sludge Strategy was undertaken in the context of national waste policy in PPS10 and the Waste Strategy 2006 Review. It concludes that there is a requirement to develop additional treatment capacity at some of our London STWs in the short to medium term.</p> <p>Thames Water is therefore concerned to ensure that a clear and relevant planning policy framework is put in place within which to consider this requirement and to determine the</p>	<p>We have sought advice on this from the GLA and their initial response is that sewage is not considered to be controlled waste and does therefore not fall within the remit of the WLWP.</p>

Ref	Source	Q3 Consultation comments	WLWP response
		<p>appropriateness of future options for its delivery. The issues and options set out in the waste strategy, whilst readily capable of interpretation in relation to municipal, industrial/commercial, construction/demolition and hazardous wastes, is less capable of unambiguous interpretation in the context of specialist waste streams such as the management of sewage sludge. We consider a broader base of issues should be encompassed within the Waste Plan, to make it explicit that appropriate sewage sludge treatment capacity in London is supported. In so doing it will be important to establish the relationship between the general waste policies of the plan and the management of sewage sludge. This should be set out clearly within the supporting text to the policy.</p>	
3.12	WLWA	<p>As some of the regional policy drivers are to be reviewed, in the meantime national policy guidance should be adopted in any areas of conflict.</p> <p>The WLWP should also include the issue of Climate Change as one of its policy drivers. Tackling climate change is a key imperative for environmental and energy policy, and the West London authorities should lead ideas and actions to show how, through strategic interventions, cities can significantly reduce emissions and adapt to the impacts of unavoidable climate change. The various technologies that recover energy from waste have significant potential to help London reduce its emissions or contribute to national reductions whilst providing a source of de-centralised energy which has the potential to reduce transmission losses.</p> <p>Waste is a valuable resource. Recycling can have substantial carbon benefits by replacing virgin materials. For very mixed waste streams energy recovery can also make a significant contribution towards reducing dependence on fossil fuels.</p> <p>Large organisations also need to deliver on the Carbon Reduction Commitment. Better waste management can help to deliver this.</p>	<p>Reducing climate change emissions has now been included as a strategic objective for the Plan.</p>
3.13	Business, Brent	<p>Encourage recycling for businesses. No separate collection for paper, biodegradable waste, glass cans or plastic.</p>	<p>Promoting recycling is an issue that is addressed by individual boroughs, and by the West London Waste Authority.</p>
3.14	Resident, Brent	<p>All waste should be incinerated and use energy.</p>	<p>Policy 3 encourages the development of decentralised energy infrastructure, rather than conventional incineration.</p>

Ref	Source	Q3 Consultation comments	WLWP response
3.15	Resident, Hounslow	Ban junk mail. Stop free plastic bags - charge 10p and use to offset rubbish collection costs. More dog poo bins.	Some of the issues are outside the scope of the Plan. See comments in section 2 above about paying more attention to waste minimisation in the Plan.
3.16	Resident, Hounslow	Has council considered using incineration to generate energy?	Policy 3 encourages the development of decentralised energy infrastructure, rather than conventional incineration.
3.17	Resident, Richmond	Incinerate waste that can't be recycled and create energy.	Policy 3 encourages the development of decentralised energy infrastructure, rather than conventional incineration.
3.18	Online questionnaire	Who are they accountable to? Should remain a "nationalised" industry not a private one. Equal proportionment of costs borough by borough.	These are not issues that can be addressed by the Plan.
3.19	Online questionnaire	Environmental regulations, particularly those related to airborne emissions. Also EU regulations on NOx which West London already breaches thanks to Heathrow and traffic density.	Climate change has now been included as key objective. There are of course other airborne emissions from the transport of waste. However, it is not considered this is a key policy driver. Sustainable transport of waste has been considered in the site assessment criteria.
3.20	Online questionnaire	Not sure is this fits the pupose but I would say put people first and if you find a gap to recycle other areas rubbish look at it locally to the envionment and the people and not just a money spinner.	The aim of the Plan is to provide a policy framework which promotes short term and long terms social benefits.
3.21	Online questionnaire	Waste reduction. The starting point should be that everything has a value and could be re-used or recycled.	See comments in section 2 above about paying more attention to waste minimisation in the Plan.
3.22	Online questionnaire	Needs to take into account local (UDP/LDF) policies.	The document will be part of each borough's LDF.
3.23	Online questionnaire	The effects of these sites on the local community.	These issues are addressed by Policy 2 in the Draft Plan.
3.24	Online questionnaire	This questionnaire is not about me having my say more about making this so un-understandable that it is impossible for me to strongly object.	The difficulty in understanding the consultation document is noted. We will aim to improve the next phase of the consultation.
3.25	Online questionnaire	Consultation should be jargon free. Perhaps a direct representative to liaise with the community in question that will enable their concerns raised to be responded to in a timely and effective manner could be a start to combat this issue.	A series of consultation meetings was held for this purpose.
3.26	Online questionnaire	Just get rid of the rubbish in a green way and get on with it.	The aim of the Plan is to identify sites and policies to promote sustainable waste management.

Question 4: Should the WLWP provide just enough land to meet the waste tonnages apportioned through the London Plan, or go beyond the target and identify sufficient land to manage even more of West London’s waste within the WLWP area to become more self sufficient?

Ref	Source	Q4 Consultation comments	WLWP response
4.1	Ealing Friends of the Earth public meeting	There was a consensus that West London should be self-sufficient, but this should be based on waste minimisation.	It is not considered necessary for west London to aim to achieve self-sufficiency, as the apportionment requirements aim to ultimately achieve self-sufficiency across London. If west London aims for self-sufficiency, there is a risk of overprovision, as there is no ability to control the movement of waste across London. As discussed in 2.1, the amount of waste arising is predicted to increase despite improvements in waste minimisation. The Draft Plan therefore considers that the most practical option is to provide for apportionment plus some contingency. It identifies a longer list of sites than its exact requirement to give the Plan flexibility, should some sites not come forward for development .
4.2	Hounslow public meeting	Some support for self sufficiency, but the need to minimise waste was stressed. A number of concerns/provisos were expressed: <ul style="list-style-type: none"> • Will there be enough sites to be self-sufficient; • It may not be practical to be self-sufficient and the aim should be to use the most sustainable method; • Concern about the accuracy of the waste predictions. 	See 4.1 above.
4.3	Brent public meeting	There was a consensus that west London should aim for self-sufficiency with the following comments/provisos: <ul style="list-style-type: none"> • The plan should aim for self sufficiency on the basis of reducing volumes of waste and 70% recycling rates; • It should be an ideal, but may not be practical, and there may be cost implications; • There may be a need to treat waste outside the area, but the proximity principle should be used. 	See first reply above. The London Plan acknowledges that if London becomes 85% self sufficient in the management of wastes by 2020, then some wastes will still be disposed of outside of London.

Ref	Source	Q4 Consultation comments	WLWP response
4.4	Harrow public meeting	<p>There was a consensus that west London should aim for self-sufficiency with the following comments/provisos:</p> <ul style="list-style-type: none"> • Priority should be given to minimisation and reuse; • There is a concern about the accuracy and validity of targets; • Ability to deal with waste will vary from borough to borough. 	See 4.1 above.
4.5	Ealing public meeting	<p>There was a consensus that west London should aim for self-sufficiency, but the need to have waste minimisation at the heart of the Plan was stressed. It was suggested that there are moral and financial reasons for doing so. It was also noted that there are likely to be some types of waste that it will not be possible to deal with in the area.</p>	See 4.1 above.
4.6	Hillingdon public meeting	<p>There was strong support for self sufficiency, which was seen to have financial and sustainability benefits, though there were dissenting voices in some groups. The following comments/provisos were expressed:</p> <ul style="list-style-type: none"> • Waste minimisation should be given priority in the Plan; • The need for additional sites to achieve self-sufficiency was disputed • Should look to deal with waste on a regional level (ie wider than the 6 boroughs) for reasons of cost, efficiency, flexibility and ease of access; • West London should specialise in dealing with particular kinds of waste. 	<p>See 4.1 above.</p> <p>The London Plan acknowledges that if London becomes 85% self sufficient in the management of wastes by 2020, then some wastes will still be disposed of outside of London.</p>
4.7	Richmond upon Thames public meeting	<p>There was some support for self-sufficiency, but the following additional points/provisos were made:</p> <ul style="list-style-type: none"> • Waste minimisation should be the first principle; • Should make sure that existing sites are used 	<p>See 4.1 above.</p> <p>The London Plan acknowledges that if London becomes 85% self sufficient in the management of wastes by 2020,</p>

Ref	Source	Q4 Consultation comments	WLWP response
		<p>efficiently;</p> <ul style="list-style-type: none"> Should apply the proximity principle, deal with waste locally, not necessarily in west London. 	then some wastes will still be disposed of outside of London.
4.8	British Waterways London	Query the intention of Waste Authorities to handle waste from other regions if this demonstrates best value?	The WLWP must offer some flexibility to developers and therefore some facilities could potentially accept wastes from outside West London.
4.9	Environment Agency	A Strategic Flood Risk Assessment needs to be undertaken in order to Sequentially Test the sites. This will enable flood risk constraints to be identified, which may render some of the site options unacceptable. Option 3 would appear to provide the best fit solution; we believe that in order to implement the plan there will be a requirement for some flexibility that would be provided by headroom in capacity. We have taken a position that MSW and C & I wastes are often similar in composition and that therefore, these waste streams should be treated in conjunction, thus offering economies of scale. This view is supported in the Mayor's draft business waste management strategy 'Making waste work in London' and through the objectives of the London Waste and Recycling Board.	The boroughs have individual SFRAs which have been reviewed as part of the development of the WLWP.
4.10	GLA	Option 2: The proposal to go above the London Plan apportionment is commended. Waste Planning authorities should achieve the maximum degree of self-sufficiency possible commensurate with their obligations for managing waste. Ensure site selection follows criteria in London Plan Policy 4A.23. The WLWP should use London Plan data for arisings and projected waste growth to ensure the West London planning authorities are able to achieve the London Plan apportionment. PPS10 sets out that the regional spatial strategy should produce data.	The WLWP uses London Plan data.
4.11	Greener Harrow	Considers London Plan (2008) contradictory in requiring self sufficiency, whilst it apportions tonnages which are more or less than the self sufficiency amount. Provision for C, D (& E) waste - see Q6. Land requirement will not only be a function of tonnage, but also type of waste, technology, local impact, cost of land, carbon footprint etc.	To ensure that the self sufficiency targets for London are achieved, the amount of waste required to be managed across London has been apportioned to boroughs on the basis of 'suitability' i.e. the amount of existing facilities, suitable land and supporting infrastructure, that exist in the borough to manage wastes. Therefore some boroughs have

Ref	Source	Q4 Consultation comments	WLWP response
		An optimisation model should be constructed.	a larger apportionment than others but if all boroughs meet their apportionment then London will meet its self sufficiency targets. The borough's apportionment only considers MSW and C&I wastes.
4.12	Hampton Society	Comparative costs and benefits.	Decisions on the development of individual sites will be strongly influenced by the cost of doing so, but that is outside the scope of this Plan.
4.13	Heston Residents' Association	The use of land should be controlled. It must not be seen as an easy option. The use of allocated land must be maximised in order to include as many users of a site/sites as possible.	The purpose of the Plan is to ensure the most efficient use of land for waste purposes.
4.14	Highways Agency, Network Operations SE	Would support Option 2 , or Option 3 . Through the identification of additional sites in the area to accommodate waste materials, it is recognised that Option 3 would help make West London as self-sufficient as possible, resulting in fewer trips on the SRN.	See 4.1 above.
4.15	Metropolitan Police Authority	Supports option 1 because it complies with London Plan Policy 4A.23	See 4.1 above.
4.16	Nugent's Park Residents Assoc, Hatch End Harrow.	The plan should cater for the expected quantity of waste to be managed during the plan period and not more.	See 4.1 above.
4.17	SITA UK	As a minimum Option 1 should be provided, i.e. make provision for the quantity of waste apportionment through the London Plan. All waste streams and all waste management options should however be catered for. The apportionment requirement should be shown for all the target years and whilst it is perhaps easier to show MSW and C&I figures collectively the target requirements for each waste stream are different and they should be shown separately for clarity. This will also assist developers in the formulation of waste management proposals, as the waste source (i.e. MSW, C&I, C&D and hazardous) does influence the type, location and management of facilities, as they all require specific considerations. Where uncertainties exist, the best possible assumptions need to be made. There should be policy provision to enable unidentified sites to be developed, subject to meeting other policies within the	See 4.1 above. The boroughs are required to meet the apportionment as a whole rather than individual MSW and C&I apportionment. The London Plan acknowledges that if London becomes 85% self-sufficient in the management of wastes by 2020, then some wastes will still be disposed of outside of London. The WLWP must offer some flexibility to developers and therefore some facilities could potentially accept wastes from outside West London.

Ref	Source	Q4 Consultation comments	WLWP response
		WLWP. The importation of waste from other areas should not be prevented, especially where the facility represents the nearest appropriate installation or is proximate to the waste arisings. The aim should be to provide 'net' self-sufficiency. Market forces will play a part in the movement of wastes.	
4.18	Teddington Society	Provision must be made for contingencies, particularly overload/breakdown/sharing with other LA's.	Agreed, the proposed sites in the Draft Plan make provision for contingency.
4.19	WLWA	London Plan is being reviewed. The growth indicators used in the plan and hence the number of facilities and capacity required are now thought to be overstated. However, if the waste modelling were corrected then the Authority would support the proposal to make more sites available to allow more of West London's waste to be managed within the area and be as self sufficient as possible.	See comments in section 2 on waste figures.
4.20	Online questionnaire	These tonnages do not seem to take account of the impact of a concerted effort to reduce the production of waste. The minimum area should be used to encourage incentives to reduce waste creation.	See comments in section 2 on waste figures.
4.21	Online questionnaire	Develop facilities to recycle waste that is hard to recycle and is currently landfilled, as a commercial venture.	The WLWP, in line with national and regional policy, will seek to ensure that waste is managed in accordance with the waste hierarchy.
4.22	Online questionnaire	The Plan should provide sufficient land for waste management facilities in order to ensure that the West London area is as self-sufficient as possible in terms of waste management. We would also urge the WLMP authorities to make some provision for contingency. This would allow for the fact that not all the sites identified for waste will come forward, whilst others might not deliver the expected waste management capacity. Furthermore, the provision of some contingency would also provide flexibility in terms of waste management across London, in the event that other areas are unable to manage all of their own waste.	Agreed, the plan proposes enough sites to allow for contingency.
4.23	Online questionnaire	West London should only have to deal with west London's waste.	The London Plan acknowledges that if London becomes 85% self-sufficient in the management of wastes by 2020, then some wastes will still be disposed of outside of London.

Ref	Source	Q4 Consultation comments	WLWP response
			The WLWP must offer some flexibility to developers and therefore some facilities could potentially accept wastes from outside West London.
4.24	Online questionnaire	What you want me to say, yes lets make it bigger and put and even bigger rubbish dump on my door step, are you mad I don't want it at all.	The Plan is aiming to propose sites for managing wastes in ways which will avoid the need for "rubbish dumps".
4.25	Online questionnaire	Do not look at sites which combine residents and industry side by side in such close proximity.	The site criteria address the issue of proximity to housing.

Question 5: Should we account for hazardous waste when making provision for waste management facilities?

Ref	Source	Q5 Consultation comments	WLWP response
5.1	Ealing Friends of the Earth public meeting	There was a consensus that sites should be provided locally for hazardous waste to minimise the transport of waste. However, it was noted that hazardous waste tends to be less bulky, so is less environmentally damaging to transport.	The Draft Plan does not make specific provision for hazardous waste as it is not considered efficient to deal with hazardous wastes at a sub-regional (west London) Level, but rather at a regional (London) level. This is because hazardous waste usually requires specialised treatment facilities which need to be of a certain size to be viable. However, planning applications for hazardous waste facilities will be treated in the same way as applications for all waste management facilities and the capacity of hazardous waste facilities will be monitored closely to establish whether additional provision is required at a later date.
5.2	Hounslow public meeting	There was little discussion on this issue, though it was noted that cost is an important factor.	Noted.
5.3	Brent public meeting	One of the discussion groups reached a consensus that self-sufficiency should apply to all types of waste.	See 5.1 above.
5.4	Harrow public meeting	There were differing views on the need for hazardous waste provision in west London, with one discussion group suggesting there is no need for a site in west London	See 5.1 above.

Ref	Source	Q5 Consultation comments	WLWP response
5.5	Ealing public meeting	One of the discussion groups stressed the importance of not treating the waste near local residents.	See 5.1 above.
5.6	Hillingdon public meeting	One of the discussion groups reached a consensus that hazardous wastes should be treated within west London.	See 5.1 above.
5.7	Richmond upon Thames public meeting	One of the groups reached a consensus that it is not feasible or sensible to provide local or sub-regional hazardous waste facilities.	See 5.1 above.
5.8	British Waterways London	Hazardous waste is an ideal material to be transported by water, in a similar way to fuel transport.	See 5.1 above.
5.9	Environment Agency	The plan is correct in making the assumption that hazardous waste can have different properties that require specialised treatment, which may only be available at a national or regional level. However, there are a number of wastes that arise in sufficient quantity that are being transported over considerable distances for treatment/disposal (from fig. 8-1) that they should be considered within the plan because of their potential transport impact. We are also committed to reducing both quantity and hazardous nature of waste produced in this sector, through substitution, process efficiency and good practice, something that we would wish to see included in supplementary planning documents. Thus we support Option 2 where it is supported by proactive monitoring.	See 5.1 above.
5.10	Friends of the Earth, Brent	If there are specialist sites then probably best solution.	See 5.1 above.
5.11	Friends of the Earth, Hillingdon	Seek to minimise transportation of hazardous waste by providing for its management within West London.	See 5.1 above.
5.12	GLA	Make a provision for hazardous waste treatment plants to achieve at regional level the necessary waste management requirements. Identify suitable sites for the storage, treatment and reprocessing of certain hazardous waste streams.	See 5.1 above.
5.13	GOL	Subject to the GLA's work and views on this matter, in	The review of sites will include sites which are suitable for

Ref	Source	Q5 Consultation comments	WLWP response
		investigating possible sites it would seem prudent to include consideration of their suitability for storage, treatment and reprocessing of hazardous waste streams.	hazardous waste. However, at this stage, no sites will be identified for particular uses.
5.14	Hampton Society	Avoid sub-optimisation [?] by keeping to London Plan.	See 5.1 above.
5.15	Heston Residents' Association	Suggests centralised registered agency for prescribed areas. Use licensed centres which make usage easy.	See 5.1 above.
5.16	Highways Agency, Network Operations SE	We recognise that the transportation of hazardous waste on the SRN can cause disruption and, in the event of an accident, cause further delays to road users. As such, we would wish to see that the West London Waste Plan recognises the importance of minimising the distance travelled by hazardous wastes. This should include the provision of treatment or disposal capacity within the West London area.	See 5.1 above.
5.17	Friends of the Earth, Richmond & Twickenham	We are concerned at the continued failure to make provision for collecting household hazardous waste e.g. batteries as part of kerbside collection schemes.	Noted, however this is the remit of waste collection and disposal authorities rather than a land use plan.
5.18	Nugent's Lane Residents Assoc, Hatch End Harrow	Hazardous waste should be managed as far as possible by those producing these materials. This is the principle of 'the polluter pays'	See 5.1 above.
5.19	SITA UK	If one of the objectives of the WLWP is to minimise transport then the plan should make provision for this waste to be managed within the area or at least make provision in the policy for unidentified sites to be developed, subject to meeting other policies within the plan. If the hazardous waste is to be treated out the sub-region consideration should be given to providing facilities where it can be bulked up to reduce transport miles. Facilities for treating hazardous waste in West London should not be excluded.	No specific provision has been made. However, planning applications for hazardous waste facilities will be treated in the same way as applications for all waste management facilities and the capacity of hazardous waste facilities will be monitored closely to establish whether additional provision is required at a later date.
5.20	Teddington Society	We must make provision for hazardous waste. There appears to be little reference to hospital waste, and how this is dealt with. P26. item 8.2. Is oil/water (waste oil) re-used in any way? Where, and what is the end use?	See 5.1 above.

Ref	Source	Q5 Consultation comments	WLWP response
5.21	WLWA	For the majority of hazardous waste, to maximise efficiencies of scale it should not be managed on a sub regional basis, therefore the WLWP should have policies for managing this waste, but should not allocate land for hazardous waste facilities. Possible exceptions could be hazardous wastes that are more similar in nature to or are generated as household waste such as clinical waste, but even these are currently dealt with on a regional basis.	See 5.1 above.

Question 6: Should we account for Construction, Demolition and Excavation wastes when making provision for waste management facilities?

Ref	Source	Q6 Consultation comments	WLWP response
6.1	Ealing Friends of the Earth public meeting	There was a consensus that sites should be provided locally for CD&E waste to minimise the transport of waste.	Whilst there was strong support to make a provision for construction, demolition and excavation wastes within the plan it is difficult to do so without suitable data on how much of this type of waste is produced within the area. The approach taken by the Draft Plan is to ensure more on-site recycling and re-use takes place by using Policy 4 whilst ensuring that boroughs monitor the types and capacities of waste management facilities developed against any new waste arising data that is produced.
6.2	Hounslow public meeting	There was some debate on whether the reuse of CD&E waste on site precludes the need to make provision for dealing with this waste.	See 6.1 above.
6.3	Brent public meeting	One of the discussion groups reached a consensus that self-sufficiency should apply to all types of waste.	See 6.1 above.
6.4	Harrow public meeting	There were a range of views including support for local provision, concerns about the cost of provision, and a question on the need for provision.	See 6.1 above.
6.5	Ealing public	One discussion group suggested that west London should	See 6.1 above.

Ref	Source	Q6 Consultation comments	WLWP response
	meeting	be self-sufficient in treating CD&E waste	
6.6	Richmond upon Thames public meeting	It was suggested that there is a need to promote the reuse of CD&E waste	See 6.1 above.
6.7	British Waterways London	Powerdays Old Oak Wharf has demonstrated that construction and demolition waste is an ideal material to be moved by water.	The Plan aims to encourage the sustainable transport of waste, including by water.
6.8	Environment Agency	<p>We support Option 1 as an approach. Whilst an increasing amount of CDEW is managed at the site of production this is not always possible. There needs to be a local provision, due to the high impact from transporting such materials over any distance.</p> <p>We also strongly support the use of Site Waste Management Plans as a means of improving material recovery and data and would advocate that Local Planning Authorities make these a requirement for planning applications.</p> <p>However a clear constraint to the development of waste sites will be flood risk, and the proximity of proposed sites to watercourses. This section must refer to this and the relevant sections of PPS25, PPS25 Practice Guide, the Thames CFMP and the London Plan.</p>	See 6.1 above. Flood Risk is addressed in the site assessment criteria and in the SFRA review.
6.9	Friends of the Earth, Hillingdon	The aim should be to increase the percentage of CD&E waste that is reused/recycled.	See 6.1 above.
6.10	GLA	Due to the nature of excavation activities, and especially for excavation works in urban areas there is rarely an opportunity to manage excavation waste on site and therefore this should not be assumed probable. A number of organisations including CE, WARP, the KPI consortium, UKCG and BRE may have useful data on construction and demolition waste. Some of the assumptions about the quantities of construction and demolition waste are likely to be affected by the costs of waste permits (currently the subject of consultation) that could discourage re-use of materials on site. This could exacerbate the transport	See 6.1 above.

Ref	Source	Q6 Consultation comments	WLWP response
		impacts.	
6.11	GOL	We consider that, as set out in London Plan policy 4A.28, on-site mobile facilities for recycling this waste stream should be encouraged to locate on large development sites wherever practicable.	See 6.1 above.
6.12	Highways Agency, Network Operations SE	This option is particularly important in terms of construction, demolition and excavation waste as these operations may lead to a significant number of HGV movements which could impact upon the operation of the SRN. It is important that trends in waste management are monitored as this will help ensure that extra land required to manage waste can be identified at the earliest opportunity, thereby preventing the unnecessary transportation of waste outside the boroughs' boundaries. Allocation of extra land within the borough will help to reduce the need to travel, in accordance to PPG13.	See 6.1 above.
6.13	Port of London Authority	One of the key issues for this type of waste is transport. The London Plan has a policy which deals with CDE (Policy 4A.28). It specifically states that DPDs should require waste to be removed from sites and materials brought to site by water wherever that is practicable.	See 6.1 above.
6.14	Resident, Hounslow	Do not transport further than required.	See 6.1 above.
6.15	SITA UK	The WLWP confirms data on C&D waste arisings is not available which makes it difficult to make provision. The best possible assumptions should however be made and it is appropriate to include an assumption of on site recycling in this regard, but whether this can be considered to leave a 'small' residue (as proposed in Option 2) should be verified. The WLWP should make provision in the policy for unidentified sites to be developed, subject to meeting other policies within the plan. Not making provision and assessing the need does not correlate well with Objective 3, which aims to only have landfill for inert waste by 2015.	See 6.1 above.
6.16	Teddington Society	Include capacity provision to manage CDE waste as <u>a must</u> . Page 27 Para 9.1. We are surprised that there is no regional policy in place to take account of CDE waste.	See 6.1 above.
6.17	WLWA	The WLWP should put in place policies requiring CD&E waste is managed effectively on site and therefore should	See 6.1 above.

Ref	Source	Q6 Consultation comments	WLWP response
		not allocate land for the management of this waste stream. Need a policy of requiring better management on site and delivery to construction facilities such as aggregates and concrete depots.	

Question 7. Do you think the site and location assessment criteria listed in paragraph 10.2, which are derived from PPS 10 and the London Plan, are sufficient for identifying capacity for waste management facilities within West London?

Ref	Source	Q7 Consultation comments	WLWP response
7.1	Ealing Friends of the Earth public meeting	<p>Participants felt that the broad location, while a starting point, were not necessarily appropriate locations for new sites. Concern over problems at existing sites, e.g. pollution of River Brent from Brent depot at Greenford and the Ealing depot. Considered that better site/facility management is needed for all waste sites, and that clusters around existing (polluting) sites should possibly be avoided. If anaerobic digestion is used – then this has implications for the location of facilities – e.g. put waste facilities close to public buildings that can use the methane and/or waste heat.</p> <p>It was suggested that the criteria for site selection should include positive criteria, e.g. provision of local employment; sustainable transport use; transport minimisation.</p> <p>Industrial areas were originally chosen because few people lived in those areas, but some industrial sites may not now be so suitable. For example in some cases significant residential areas have grown up round them (e.g. Acton).</p> <p>Existing waste transfer sites should be converted for processing use where possible, to minimise the need for new sites (e.g. they may be suitable for MRF facilities).</p>	<p>The Draft Plan looks at the potential for re-orientating existing waste transfer sites to manage or treat wastes. Not all sites are identified as suitable for this purpose. The London Plan requires that all existing waste sites are safeguarded, or equal and compensatory sites provided. However, policy 1 provides for the replacement of existing waste sites.</p> <p>A number of site assessment criteria have been used to determine the most suitable sites including proximity to residents and nature conservation areas. There are also criteria on sustainable forms of transport and potential for combined heat and power.</p>
7.2	Hounslow public meeting	Support for using existing facilities ('always have to start where an existing facility is because less transportation and	See 7.1 above. PPS2 and London Plan policy is to avoid inappropriate

Ref	Source	Q7 Consultation comments	WLWP response
		<p>less of an issue for residents') but:</p> <ul style="list-style-type: none"> • Need to assist existing facilities to maximise their sites; • Can't assume that all areas that have been used as facilities in the past are good; <p>Differing views on acceptability of green belt. Some thought waste use analogous to uses such as quarrying in green belt (and CDE waste is a good way to restore quarries!). Others were opposed to use of green belt.</p>	<p>development in the Green Belt. In the site review process, the impact on the surroundings of any potential sites in the Green Belt was carefully considered.</p>
7.3	Brent public meeting	<p>Sites suggested in the Mayors' Plan appropriate for larger sites. Road access considered important and even motorway access for heavy/ dirty waste. Lighter facilities could be located in residential areas. The plan needs to take account of Air Quality Management issues. The North Circular Road already breaks air quality limits, and there is an Air Quality Management Area covering the North Circular and the South of Brent. It was felt that whilst all waste sites would impact on air quality to some degree (re transport of waste), incinerators and composting sites may have particular impact. The assessment of (larger) sites should include consideration of: protecting air quality; transport of waste (minimisation/sustainable modes); avoiding proximity to residential areas (particularly high density areas); and flood risk.</p>	<p>The issues discussed, including proximity to AQMA, have been included in the site assessment criteria.</p>
7.4	Harrow public meeting	<p>Industrial sites are suitable. Would prefer industrial sites rather than sites located near to residential areas. Debate about whether green belt would be suitable: pros and cons. General agreement that sites have to be appropriate to the area, e.g. composting may be appropriate to green belt. One view that small employment sites are not appropriate.</p>	<p>Site assessment criteria include avoiding proximity to residential areas. PPS2 and London Plan policy is to avoid inappropriate development in the Green Belt. In the site review process, the impact on the surroundings of any potential sites in the Green Belt was carefully considered.</p>
7.5	Ealing public meeting	<p>Consensus that in general, existing sites and industrial locations were appropriate. However, some caveats:</p> <ul style="list-style-type: none"> • Some existing sites may have problems (e.g. residential location). If an area has a known problem with dust, health, air pollution, flies, noise etc – then it should not 	<p>See 7.1 above.</p>

Ref	Source	Q7 Consultation comments	WLWP response
		<p>have more polluting activities located there. Park Royal was referred to as a site that may be considered, but concern expressed about the impact of new waste facilities on existing businesses and residential areas;</p> <ul style="list-style-type: none"> • Need to be accessible; • Existing sites may be better for sorting, and industrial sites for processing; • Need to co-ordinate with other non west London boroughs; 	
7.6	Friends of the Earth, Hillingdon	<p>Sites should promote additional benefits such as sources of local employment, transport minimisation, maximisation of more sustainable transport modes, etc. Fringe or peripheral locations, eg Green Belt existing waste management locations, may consolidate/reinforce existing environmental costs/disbenefits.</p>	See 7.1 above.
7.7	Hillingdon public meeting	<p>Support for existing locations, but capacity an issue. Participants felt that the Plan should not consider any additional or new sites until it has maximised use of existing sites. There are only a limited number of industrial locations in the borough. Green belt, country parks or flood plain should be exempt. No mega-sites should be located in the Green Belt, because it is away from where the waste is made.</p>	See 7.1 above.
7.8	Richmond upon Thames public meeting	<p>Broadly, support for Mayor's broad categories, except that due to Richmond's geography, most employment areas are very small, and therefore not suitable. Comments included:</p> <ul style="list-style-type: none"> • Waste facilities shouldn't be on green belt land; • CHP needs to be near new housing; • Avoid floodplains; • Should look at green waste composting on green areas such as Kew, Bushy Park, Richmond Park, allotments. 	<p>See 7.1 above. Flood risk was one of the criteria used in site assessment.</p> <p>PPS2 and London Plan policy is to avoid inappropriate development in the Green Belt. In the site review process, the impact on the surroundings of any potential sites in the Green Belt was carefully considered.</p>
7.9	British Waterways London	<p>The site criteria should look at inter-modal sites as priorities, such as the connections between road and water along the M4 corridor, and between rail and water at Willesden</p>	<p>The site criteria include access to railheads and navigable waterways.</p>

Ref	Source	Q7 Consultation comments	WLWP response
		Junction and King's Cross, where sites are viable, practical, sensible and feasible.	
7.10	Environment Agency	In order to allocate sites for waste management the sequential test as detailed in PPS25 must be applied. In order to sequentially test site allocations you will need to undertake a Level 1 Strategic Flood Risk Assessment, you have already been advised of this need. If your sequential test identifies a need to redevelop floodplain sites for waste management purposes then it will be necessary to then undertake a Level 2 SFRA to establish whether the Exceptions Test can be passed. Consideration needs to be given to potential for synergies between facilities (i.e. provision of recycle for a production process) and siting of facilities for cleaner waste technologies (such as Producer Responsibility and reverse logistics).	The boroughs have individual SFRAs which have been reviewed as part of the development of the WLWP. The sites have been considered with regard to the SFRA and exceptions tests applied where necessary.
7.11	Friends of the Earth, Brent	Proximity to source is not necessarily the best test of where sites should be, particularly if those sites are transfer stations. Proximity to the ultimate market is also relevant as are economies of scale. The full transport impact must follow the waste for the whole of its journey.	Agreed, but unless we know the size and type of facility to be built on each site it is difficult to assess the full transport impact at this stage. Traffic Impact Assessment will be required, through draft policy 2, at the planning application stage.
7.12	Friends of the Earth, Hillingdon	All waste to be planned for, but expect increasing efficiency in reuse/ recycling etc.	See comments in section 2 on waste minimisation.
7.13	Friends of the Earth, Richmond & Twickenham	Concerned that the extent of prioritising existing waste sites and industrial locations may lead to an uneven spread across West London which will increase the need to use road transport and mean that the public in some parts of West London are less aware of how their waste is being dealt with. It may also lead to facilities that generate heat being built in locations where the heat is not needed with corresponding climate change implications.	In producing the list of sites in the Draft Plan, the distribution across west London, especially in terms of sustainable transport movements, has been taken into account. However, it has not been possible to achieve a uniform distribution due to the lack of availability of suitable sites in all areas. CHP and CCHP have been considered in the site assessment criteria.
7.14	GLA	Option 1 & 2 - reflects the criteria identified in London Plan policy 4A.23 (and policy 4A.20). Wherever possible opportunities should also be taken to include provision for CHP and CCHP and to accommodate the various related facilities on a single site (resource recovery parks).	CHP and CCHP opportunities have been considered in the site assessment criteria. The criteria also prioritise access to rail and water transport.

Ref	Source	Q7 Consultation comments	WLWP response
		Also highlight the importance of reflecting London Plan criteria in any site assessment criteria adopted for west London in particular the need to assess the full transport impact of all collection, transfer and disposal movements, particularly maximising the potential use of rail and water transport.	
7.15	GOL	In terms of safeguarding existing sites, it would be sensible to include these sites in the DPD so that there is a coherent strategy for waste management in place, in the one document, that is clearly in general conformity with the London Plan requirements. In addition to existing waste management sites presumably the most favourably considered broad locations for sites are likely to be those in identified Strategic Industrial Locations (table 4A.8 in London Plan refers) and Local Employment Areas?	All existing safeguarded sites are listed in the Proposed Sites Technical Report, attached to the Draft Plan. A range of sources of information were used to establish the list of potential sites, including the criteria in the London Plan.
7.16	Heston Residents' Association	Existing local infrastructure, particularly road network, will be critical in site selection.	Proximity to the Transport for London Road Network and the Strategic Road Network have been considered as part of the site assessment.
7.17	K H Wembley Trust No. 2	More emphasis should be put on the assessment of 'proposed neighbouring land uses';. It is important to consider the location of new and existing sites for waste facilities in the context of wider town planning frameworks and to have considerations for any emerging strategic/masterplan aspirations being prepared by the council. In particular, regard should be paid to any emerging plans for new areas of residential development which are likely to be sensitive receptors.	The WLWP is being developed in conjunction with each borough's LDF to ensure it conforms to emerging strategies, plans and policies.
7.18	Metropolitan Police Authority	Two additional points recommended: <ul style="list-style-type: none"> • Minimising conflict with current/potential uses; • Consultation with key stakeholders (ie police) which will ensure that sites are most appropriate and won't conflict with other land use requirements. 	How the sites link with existing users was considered in the site assessment. The consultation on the Draft Plan gave stakeholders an opportunity to comment on individual proposed sites.
7.19	Nugent's Park Residents Association	In choosing sites, priority should be given to environmental and social criteria rather than those based simply on economic viability. Policies should pay particular attention to the impact on residential neighbourhoods and their character. Areas of	A range of social and environmental criteria have been included in the site assessment process. This specifically includes proximity to residential areas, and areas of historical value and character.

Ref	Source	Q7 Consultation comments	WLWP response
		<p>historical and/or special architectural value need to be protected. The impact of policies on the role of individual householders should also have a high priority.</p>	
7.20	SITA UK	<p>Option 2, the location and site assessment criteria are not sufficient and need to be developed to provide a more detailed set of criteria specific to West London. SITA support the prioritising of existing waste management facilities. However, any existing use should not preclude the potential for the sites to be redeveloped for other types of waste management activities and the site assessment should review the potential to redevelop existing sites, especially and including the sites referred to in SITA's response to Question 4a above. PPS10 and other policy do not preclude the development of certain waste management activities in the Green Belt and in this regard Green Belt should not be considered as a constraint to development. The infill of quarries (with regard to all waste streams) should be considered as an appropriate method of restoring quarry developments. The need to consider the requirements for landfilling residual wastes has been raised in responses to other questions in this consultation response. The reference to proximity needs to be reviewed to ensure it confirms with the policy within PPS10.</p>	<p>See first answer above. PPS2 and London Plan policy is to avoid inappropriate development in the Green Belt. In the site review process, the impact on the surroundings of any potential sites in the Green Belt was carefully considered.</p>
7.21	South Ruislip Residents' Association	<p>Table no. 5-9 on page 40 gives considerable concern because of the extra traffic that would be associated with a new facility at Stonefield Way/Victoria Rd. The traffic generated from the use of the West Waste refuse transfer facility already creates a considerable problem. That problem is recognised by LB Hillingdon who recently engaged MVA Consultants to assist them in finding a solution to the long running problem of heavy freight traffic entering and leaving South Ruislip. Part of that problem is the heavy traffic going to the West Waste site and the other licensed Waste Transfer site in Civic Way operating by Gowing and Pursey. We therefore request the removal of Preferred Industrial Location</p>	<p>The review of existing waste sites undertaken in developing the Draft Plan has suggested that Victoria Road Transfer Station has the potential for redevelopment. It has been therefore been included in the list of sites in the Draft Plan. The Residents' Association's concerns about the traffic generated from the existing site are understood, and these are issues which can be considered further in the consultation process on the Draft Plan. It should be noted that if the site was to be developed, it would need to be the subject of a planning application, and any proposed development would need to meet the requirements of WLWP policies, including the policies in draft policy 2, which</p>

Ref	Source	Q7 Consultation comments	WLWP response
		at Stonefield Way/Victoria Road, Hillingdon to be removed from the list.	addresses a wide range of potential impacts, including transport issues.
7.22	Teddington Society	The location and site assessment criteria as specified in Para 10.2, alone are not sufficient and need to be developed to provide a more detailed set of criteria. It is suggested that a much broader relationship must be allowed for eg. Proximity to adjoining (other LA, existing or planned) waste facilities. Or indeed adjoining landscape, nature reserves, historical features, flooding etc. We note that this is partially recognised in the Sustainability Appraisal (P23, 6.4). There is no mention under "transport" of conveyance by tube. This could be an effective means of transport, considerably reducing the need to transport waste overland.	The criteria used to assess potential sites includes the issues suggested.
7.23	WLWA	The proximity to source of waste is less important in a relatively built up area such as West London as almost any site in the area will be close to the source of the waste. The criteria on the full transport impact should be measured in terms of carbon impact and should compare the journey time and fuel consumption when travelling in congested areas. The issue of potentially high land costs within the area of the WLWP needs to be considered with care, and consideration be given to balancing disproportionate cost, particularly for Council tax payers, that could be incurred by adopting a rigid approach to self sufficiency. The WLWA suggests that the Waste Plan emphasise the links between sustainable waste management and climate change and ensure that policies enable the boroughs to work towards a reduction in climate change impact.	The criteria used to select the sites in the Draft Plan includes proximity to the Transport for London Road Network and/or Strategic Road Network. Because specific technologies or uses are not identified for specific sites in the Draft Plan, it is not possible to identify more detailed transport impacts at this stage. Therefore, the approach taken by the Draft Plan is for transport impacts to be identified at the planning application stage. This is specifically covered in policy 2. The importance of reducing climate change impact is agreed, and draft policy 2 addresses this issue.
7.24	Online questionnaire	Ensure the materials are separated and moved to areas where the environment benefits and to look at methods of recycling at every venue.	The aim of the Plan is to identify sites and policies to facilitate sustainable waste management.
7.25	Online questionnaire	Make it easier and/or cheaper to reuse or recycle than to dump, especially for companies.	As discussed earlier, this is the remit of waste collection and disposal authorities rather than a land use plan.
7.26	Online questionnaire	How do you assess the cumulative impact of previous waste facilities on the community - and how realistic is it to infer that areas might be freed of waste management uses when it	See first reply above.

Ref	Source	Q7 Consultation comments	WLWP response
		is likely to be even more difficult to find sufficient new sites for waste uses.	
7.27	Online questionnaire	We need more use made of (pollution free) incinerators	See comments in section 2 about promoting new technologies rather than conventional incineration.
7.28	Online questionnaire	Areas already dealing with waste and recycling should not be further burdened. Affluent areas need to share burden	The London Plan requires that all existing waste sites are safeguarded, or equal and compensatory sites provided. An assessment of suitability and deliverability in terms of expansion of existing sites has been carried out. In producing the list of sites in the Draft Plan, the distribution across west London, especially in terms of sustainable transport movements, has been taken into account. However, it has not been possible to achieve a uniform distribution due to the lack of availability of suitable sites in all areas.
7.29	Online questionnaire	Support Option 1. However, request that additional criteria are developed to recognise the importance of maximising the use of brownfield/previously developed land and also the potential for existing building/structures to be adapted to provide waste management facilities.	The sites assessed include preferred industrial locations, existing waste management sites, local employment land and opportunity areas, as suggested in the London Plan. Sites have been visited and assessed on their existing uses, amongst other criteria.
7.30	Online questionnaire	The last item on the criteria should be taken out....existing waste management locations should not be added to if there are residents/communities nearby. These facilities should be shared and other sites used.	The London Plan requires that all existing waste sites are safeguarded or equal and compensatory sites provided. An assessment of suitability and deliverability in terms of expansion of existing sites has been carried out
7.31	Online questionnaire	Again this does not make any sense to a lay person, what I want to make sure is that you are not going to put a rubbish dump on my door step, and frankly I don't want to have to read through all the rubbish typed above.	We understand that this is the main issue that concerns most local residents. The Draft Plan gives local people an opportunity to comment on specific sites.
7.32	Online questionnaire	A list of fulfilled criteria of already live sites both for the borough and country should be presented, with corresponding research and feed back from residents in the UK that presently live in proximity of sites that provide the planned resources in the WLWP.	The criteria are derived from national and regional policy guidance. The criterion includes but is not restricted to proximity to residents, roads, waterways and nature conservation areas.

Q 8. How should we allocate sites with respect to the type of waste management activity taking place on each site?

Ref	Source	Q8 Consultation comments	WLWP response
8.1	Ealing Friends of the Earth public meeting	Technologies which are 'bad neighbours' should not be located near residential areas. Ideally, the process should be to identify the technology first and then an appropriate site. This could be achieved by specifying site selection criteria for each technology. For example: small, local sites may be appropriate for composting; but glass recycling may require a bigger site to allow enough space for the relevant technology. No site will be suitable for all technologies, so the plan could specify a range of possible technologies for each particular site.	The Draft Plan identifies sites for general waste use only, as this is considered the best approach to provide flexibility. The approach suggested in the Draft Plan is to use the policies within the Plan to manage developments to ensure they are suitable for the site and its surrounding uses. This will help the Plan to be flexible and allow for developments and improvements in waste management technologies and in the changing habits of consumers and waste producers. All proposed developments will have to submit a planning application which will be assessed in line with the West London Waste Plan and other borough plans and strategies and also public consultation.
8.2	Hounslow public meeting	The prevailing view was a degree of flexibility – not being too prescriptive as new technologies develop. Need to engage with the developers: what level of flexibility/certainty will the developers need? Financial viability is relevant. Whilst some thought that we shouldn't close the door on anything at this stage, some wanted to exclude incinerators, others encourage CHP.	See 8.1 above, and comments on energy from waste in section 2.
8.3	Brent public meeting	Consensus to support a criteria based approach, i.e. the plan should set out principles and criteria (e.g. restricting the impacts of facilities, particularly for certain types of sites), and allow this to inform the choice of technology. The plan should be clear about what is planned for an area, to inform residents. Points noted included: <ul style="list-style-type: none"> • West London Waste Authority should provide impact assessments on various technologies to help inform plan; • The plan should specify that waste management technologies should have the least environmental impact and should keep materials in use. It was felt that these principles would effectively rule out incineration. 	See 8.1 above. The Draft Plan includes a list of proposed sites. Policy 2 in the Draft Plan lists the requirements that any developments on the proposed sites will have to address.

Ref	Source	Q8 Consultation comments	WLWP response
8.4	Harrow public meeting	Accepted need for degree of flexibility, but some technologies could be ruled out on location grounds. Plan should not be prescriptive about technology. May be OK for some sites but not apply to all. Can look to have multiple facilities on one site. Felt that the Plan should have a policy which ensures that all new built development must incorporate state of the art waste minimisation/ recycling facilities on site.	See 8.1 above. Policies on provision of waste minimisation and recycling facilities in new development need to be addressed by individual borough's Core Strategies.
8.5	Ealing public meeting	<p>There were differing views between the break out groups on the best approach with 3 views expressed:</p> <ul style="list-style-type: none"> • The plan being as <u>specific as possible</u> with the plan setting out criteria for each site, and each type of facility, the method of transport, the predicted impacts and the criteria that would rule different facilities in or out for this site: 'we want to know what decisions are based on'. Any changes in technology or use of site should be communicated to local residents on good time; • Need to develop a criteria-based approach, specify a range of technologies, but <u>not too definitive</u>, need to allow for new technologies, though should rule out certain technologies from the beginning (e.g. incineration, but also had concerns about pyrolysis and gasification, as they all need feedstocks of plastics and paper, which it is better to separate for recycling); • You <u>can't specify the technology</u> to be used. Depends on the site and what's appropriate. Technologies are so new that not sure which are best. Sites will dictate the kind of technology. Can't say which sites would be suitable for what because just don't know. <p>Other comments:</p> <ul style="list-style-type: none"> • Good to provide for effective CHP, small and large scale, and District heating, should all be encouraged • Waste sites should use clean technologies and noise control etc. • Ealing Council has a 'no incinerator' policy. The group as a whole wanted no incineration in the borough. If an incinerator was proposed, the council should be asked to 	See 8.1 above. See also comments on energy from waste (as opposed to conventional incineration) in section 2. Policy 3 in the Draft Plan aims to promote decentralised energy schemes.

Ref	Source	Q8 Consultation comments	WLWP response
		justify how this would fit with the Climate Change Act. <ul style="list-style-type: none"> The plan should provide sites suitable for supporting <u>reuse</u> (e.g. refilling bottles) as well as recycling 	
8.6	Hillingdon public meeting	Wide range of views expressed. Considerable support for being flexible (e.g. as technology changes and new technological advances are likely) but it should still be possible to specify ranges appropriate for particular sites. Facilities proposed should be appropriate for specific locations. Others wanted to be more specific, seeking a framework that gives criteria or suggesting that the Plan could state what the site is not suitable for i.e. excludes unacceptable waste management facilities. Other views: <ul style="list-style-type: none"> We should share certain facilities (dependent on the type of waste) with other West London boroughs and develop a network of waste facilities; Many felt that they needed more information on different technologies and what happens at present; Don't say what goes on it but just that it must benefit the local community; Best to go for 'best practice' (and avoiding bad practice) as part of the planning criteria; There should be no blanket 'no' to any technology; Experts/ market should decide. 	See first reply above. Policy 2 in the Draft Plan lists the requirements that any developments on the proposed sites will have to address.
8.7	Richmond upon Thames public meeting	Prevailing view was for a 'middle ground', or 'common sense filter', based on issues like noise, smell etc. Don't be too specific, as this could exclude new technologies. Could specify non 24 hour operations in some cases. Needs to be practical and reflect scale of facilities. Only some technologies will be suitable on some sites, depends on size needed by the technology. Need flexibility for new technologies, but composting will always be required. However, some felt it important to identify what technologies will be used.	See 8.1 above.
8.8	British Waterways London	Offer assistance with site and wharf assessments to facilitate waste by water. Refer to TfL's Freight Unit for further	Proximity to sustainable transport options, including water has been addressed in site assessment criteria.

Ref	Source	Q8 Consultation comments	WLWP response
		guidance on the planning policy toolkit being developed to help with site allocations.	
8.9	Friends of the Earth, Richmond & Twickenham	We believe that building a mass burn incinerator in West London would be a great mistake for a variety of reasons including inflexibility, the need to feed it with material that should be recycled, air quality, CO2 emissions, ash disposal and the fact that any proposal to build an incinerator will cause a public outcry which is likely to lead to delay in being able to get such a facility up and running.	See 8.1 above. See also comments on energy from waste (as opposed to conventional incineration) in section 2. Policy 3 in the Draft Plan aims to promote decentralised energy schemes, rather than conventional incineration.
8.10	GLA	London Plan policy 4A.23 which deals with site selection criteria makes no reference to technology-type. Policy 4A.26 calls for boroughs to provide a range of facilities. The table with the range, number and land-take of waste facility is purely indicative and is supported as it allows for flexibility in a waste technology provider coming forward. The GLA does, however, demonstrate a preference for advanced conversion treatment technologies in policy 4A.21. In general the waste DPD should allocate land based on the location of suitable land ie existing waste sites, Preferred Industrial Locations and local employment areas. Opportunities for co-location and local energy and heat use should be favoured. Ideally this will result in a clustered/de-centralised distribution reducing transportation and maximising energy efficiencies. The Plan should support the co-location of manufacturing from waste with waste management facilities and renewable energy generation with waste management facilities.	See 8.1 above.
8.11	Resident, Hounslow	Incinerators should be 2 miles from any housing.	See 8.1 above. See also comments on energy from waste (as opposed to conventional incineration) in section 2. The criteria used to choose all the waste sites in the Draft Plan includes proximity to residential areas.
8.12	SITA UK	Favour Option 4, a combination of the options so that some sites are specific for technologies and some sites have a range of technologies. All sites should be considered for different types of technologies and only where a technology has been determined to be unsuitable should a site not be allocated for a technology. Allocations should refer to the potential suitability of sites for certain waste management options. Care must be taken not to be too specific about the technology to be	See 8.1 above.

Ref	Source	Q8 Consultation comments	WLWP response
		provided to provide flexibility and avoid stifling innovation.	
8.13	Teddington Society	It is essential to combine options, so there is facility for flexibility. If one site fails the test (planning/community opposition/geology/ecology say) then a geographically related alternative must be available.	See 8.1 above.
8.14	WLWA	The WLWP should be as flexible as possible in its approach to size of sites and should not allocate any technologies to any site to not stifle innovation, including effectively frustrating the use of any emerging technologies.	See 8.1 above.

Question 9: Which of the following options offers the best approach for maximising capacity of waste management facilities within West London?

Ref	Source	Q9 Consultation comments	WLWP response
9.1	Ealing Friends of the Earth public meeting	There was generally more support for many smaller facilities, rather than a few larger facilities: 'small is beautiful'. But it was recognised that, for some waste technologies, there may be tensions between 'small is beautiful' and 'economies of scale'.	The Draft Plan adopts the hybrid approach of identifying sites ranging from larger sites suitable for collocation of one or more facilities through to smaller sites for smaller-scale facilities and local facilities.
9.2	Hounslow public meeting	No real consensus. Views included: <ul style="list-style-type: none"> • Need a mix of size of facilities. Depends on the amount. For hazardous you'd only need one; • Need lots of small sites to avoid transporting waste any distance: road system is a problem; • Need 2 civic amenity sites in the Borough. 	See 9.1 above.
9.3	Brent public meeting	General consensus for a mixture of large and small sites would be ideal. Some in favour of few large sites (have it all in one place, plus economic argument), others saw drawbacks of this approach (generate too much traffic). Small facilities make sense for some processes, egg green waste composting. There probably need to be some bigger sites, but not too much concentration of these. Overall, there was consensus that certain technologies would be suitable for certain sites (e.g. small sites near residential	See 9.1 above.

Ref	Source	Q9 Consultation comments	WLWP response
		areas; larger sites in industrial areas).	
9.4	Harrow public meeting	<p>Could see pros and cons of both centralised and decentralised approaches. Views included:</p> <ul style="list-style-type: none"> • Dealing economically with large amounts of waste needs large sites, e.g. could be need for one large site in West London; • Need a number of smaller facilities – say 20,000-50,000 tonnes – to take account of technological advances. 	See 9.1 above.
9.5	Ealing public meeting	<p>Mixed response.</p> <ul style="list-style-type: none"> • depends on the facility e.g. don't need glass reprocessing facility in every borough; • need to restrict amount of transport, but need to consider economies of scale; • support for small facilities – 'intermediate collection'; • should be strong encouragement for people to compost their own waste; • Don't centralise facilities in one place – share out the pain. 	See 9.1 above.
9.6	Hillingdon public meeting	<p>More support for more small sites than a few large ones. Even where people supported 'large sites' recognition that we would still require a number of smaller Civic Amenity sites providing a good level of accessibility for local people. Others felt that it was too early to answer this question. Issues that they would want to understand better before answering it are:</p> <ul style="list-style-type: none"> • How far would waste be transported in each case? • What would be treatment costs are? (E.g. One participant, working in the waste industry, reported that she recently shipped a consignment of tyres off to Cornwall because they were too expensive to treat locally.) • What would efficiency and best practice imply? 	See 9.1 above. The market influences the cost of disposal and also therefore the distances that waste is transported (example illustrated within the question). Presumably if there were more sites able to treat wastes locally the costs would be more competitive and distances waste travels would be reduced.
9.7	Richmond upon	Views expressed both ways e.g. small facilities may not be	See 9.1 above.

Ref	Source	Q9 Consultation comments	WLWP response
	Thames public meeting	<p>practical, but then who wants to live near a large facility? Small local sites thought to be good for:</p> <ul style="list-style-type: none"> • composting, e.g. on allotment sites of which there are 24 sites in Richmond; and • Lots of small sites then better incentive to recycle and journey distance less. <p>Size of facility depends on use. Sites need to be located with reference to where waste is created and processed.</p>	
9.8	British Waterways London	Site allocation is subject to economies of scale, and it may be more cost effective to provide larger accommodating sites such as Powerday.	See 9.1 above.
9.9	Ealing residents' associations' meeting, 30 March 2009	Could say that it's favourable to have recycling facilities near where they live as recycling rates would increase. If rich areas in Ealing had a site on their doorstep they would be more involved in the waste management.	See 9.1 above.
9.10	Friends of the Earth, Brent	Essential to position the facilities taking into account the waste's onward journey.	See 9.1 above.
9.11	GLA	Support Option 3 which supports paragraph 4.81 of the London Plan. It allows boroughs to tailor the approach best suited to their circumstances. There are benefits in both small and large sites. In considering energy from waste facilities preference should be given to advanced waste technologies such as gasification, pyrolysis and anaerobic digestion. These could be co-located with pre-treatment facilities (thereby utilising larger sites). When considering the options the maximum opportunity to beneficially use the waste heat from the treatment facility needs to be taken into account. Please ensure that when identifying existing capacity to meet the West London boroughs apportionment, the correct facility type is being included. For example Reuse and Recycling Centres do not count as management for waste apportionment in line with paragraph 4.71 page 230 of the London Plan. TfL recognises that both a centralised approach and a decentralised approach have advantages and disadvantages from a transport perspective and would support an approach that took full transport impact as the starting point. As identified a decentralised approach may reduce travel distances but a centralised approach may provide	See 9.1 above. The comments about the type of facilities included within apportionment capacity have already been addressed in developing the Draft Plan.

Ref	Source	Q9 Consultation comments	WLWP response
		economies of scale that enable sustainable transport options to be adopted. Transfer facilities between transport modes including wharves and depots may be necessary, particularly for a hybrid approach but again the site selection should take into account full transport impact. If a centralised approach were to be adopted with a smaller number of large sites, good access for staff would be needed including provision for cycling as well as walking.	
9.12	Greener Harrow	Recommend using an optimisation model which also includes transport modes to/from sites (link to Q9). Optimise costs, recycle/reuse and Carbon footprint.	Optimisation models are useful if it is known exactly where the wastes will be coming from, the treatment technology to be used and where any end products may be going to. We do not know this information at this stage although the Draft Plan policy 2 requires developers to undertake a traffic impact assessment of any facility at planning application stage.
9.13	Highways Agency, Network Operations SE	Supports Option 3 as it seeks to ensure that waste disposal sites are located close to the sources of waste. This means that majority of the waste will be managed locally without the need to travel outside the West London area. Consequently this approach will minimise the need to travel as recommended by PPG13, and therefore reduce the impacts of waste transportation on the local roads and the SRN. Furthermore, we also support Option 3 in 'bulking up recyclables for onward movement', as this will reduce the number of waste vehicle movements on the highway network, and therefore reduce the impacts of waste transportation on local roads and the SRN.	See 9.1 above. Draft Plan policy 2 requires developers to undertake a traffic impact assessment of any facility at planning application stage.
9.14	SITA UK	Option 4, alternative to the other options. It is considered that the approach cannot really be determined until the need and capacity requirements for all waste streams have been considered. When considering allocations their deliverability should be considered. Targets for new facilities (including new facilities on existing sites) should be expressed as a minimum and that exceed the targets would be welcomed.	See 9.1 above.
9.15	Teddington Society	A hybrid approach must be the answer. Each LA within the WLWA has a considerable variation of different land uses, and each will be able to adapt and accommodate in a different manner.	See 9.1 above.

Ref	Source	Q9 Consultation comments	WLWP response
9.16	WLWA	The WLWP should be as flexible as possible in its approach to size of sites	See 9.1 above.
9.17	Online questionnaire	Alternatives: small sites for local recycling/reuse - e.g. collection and distribution of wood for space heating, and direct transfer of recyclable materials to local factories that can use them.	The Draft Plan aims to propose a range of sites for different uses.

Q 10. Which of the following five options provides the most suitable approach to the sustainable transport of waste within West London?

Ref	Source	Q10 Consultation comments	WLWP response
10.1	Ealing Friends of the Earth public meeting	<p>Advocated the use of canals for transport although there was some discussion as to whether canals are currently usable for the transport of waste (e.g. sourcing the right size of barge for the East Acton site). It was noted that there are three aspects to transport, not all of which will be suitable for canal-based transport:</p> <ul style="list-style-type: none"> • Collection of waste (waste coming in – less suitable for water-based transport); • Residual landfill (waste going out – more suitable); • Recycled products/intermediate products (going out - more suitable). 	<p>The criteria used to select the sites in the Draft Plan give priority to a range of modes. Criteria included both:</p> <ul style="list-style-type: none"> • Proximity to the Transport for London Road Network and/or Strategic Road Network; and • Proximity to sustainable transport options e.g. rail and water.
10.2	Hounslow public meeting	<p>Advocated sustainable transportation of waste, including keeping it as close to place of production. If you have to transport it best to be near the railroad or major trunk road. Support for road/ motorway access, rail network, using obsolete wharves and railheads. Still have sites in Hounslow that are accessible by rail: egg Boundary Road, Feltham.</p>	See 10.1 above.
10.3	Brent public meeting	Road transport considered important, even motorway access for heavy/ dirty waste. Where possible, sites should be	See 10.1 above.

Ref	Source	Q10 Consultation comments	WLWP response
		located near: railway lines; or the Grand Union Canal (GUC) or other waterways.	
10.4	Harrow public meeting	Support for using waterways, but rail capacity limited.	See 10.1 above.
10.5	Ealing public meeting	Consensus – want waste to be transported in ways which minimise pollution (e.g. water, rail...) but without prejudicing local residents. Use water first, rail second and then road. Sites should be close to accessible transport; canals, road network, rail but capacity issues. Concerned not to write-off rail, need to properly investigate.	See 10.1 above.
10.6	Hillingdon public meeting	General support for road, rail and waterway access, although recognition that not all roads are suitable. Major issue re identifying sites is around transport access. Only a few (or 2) roads suitable for volume of traffic generated: A40; A25; M25; M4; A4. Need sites with access to rail and water transport so sites close to rail line and Grand Union Canal should be considered. Participants were generally very complimentary about management of waste sites in South Ruislip, which are clean and well run, but they said that traffic congestion was a major problem around the waste sites in the area.	See 10.1 above. Proximity to the Transport for London Road Network and the Strategic Road Network been considered as part of the site assessment along with access to railheads and navigable waterways. Sites have also been visited and assessed on the suitability of current access roads. In addition Draft Plan policy 2 addresses the issue of impact of development on local traffic.
10.7	Richmond upon Thames public meeting	View expressed that rail and water transport is not practical in Richmond.	Has been reviewed in site assessment process.
10.8	Brentford Community Council	Have advocated use of waste freight by canal for some time. They have recommended that the covered canal side wharfs on the Commerce Rd site west of the Brentford canal basin should be brought back into use. This proposal has been welcomed by residents facing the canal but not by the Inspector who held the public enquiry in 2007.	Access to railheads and navigable waterways has been considered within the site assessment criteria.
10.9	Ealing residents' associations' meeting 30 March 2009.	Houses shake when the lorries pass and the area is jam packed from 10.30am.	Local residents' concerns about traffic are appreciated. There is an opportunity at the consultation on the Draft Plan to express concerns in relation to specific sites included in the Draft Plan. In addition Draft Plan policy 2 addresses the issue of impact of

Ref	Source	Q10 Consultation comments	WLWP response
			development on local traffic.
10.10	Environment Agency	We support Option 2 as this would appear to offer sustainable options with a degree of flexibility.	See 10.1 above.
10.11	GLA	The WLWP must set clear policy to safeguard any sites that have access to sustainable transport modes. Preference should be given to managing waste close to point of source. A location policy that minimises the number and volume of waste movement on the Transport for London Road Network or the Strategic Road Network should be one of the key aims. Consideration should be given to this factor in deciding where new facilities are located in accordance with London Plan policy 4A.22 (Spatial Policies for Waste Management). TfL would not support the do nothing option (option 5) and would want to see sites prioritised that maximised the potential to use alternatives to road transport including water and rail. However, minimising adverse impacts on the road network should be given equal prominence. Direct access onto the Transport for London Road Network or Strategic Road Network would be resisted. There will also be locations that may have good strategic road access but capacity is limited due to congestion. There may be a need to consider transport improvements to mitigate adverse traffic impacts at particular locations. Waste movements may also need to be restricted to off peak periods when congestion less severe. Dialogue will be required with TfL and the local highway authorities to agree preferred locations from a transport perspective and the routing of waste movements that arise.	See 10.1 above. There is an opportunity at the consultation on the Draft Plan to express concerns in relation to specific sites included in the Draft Plan. In addition Draft Plan policy 2 requires consideration of transport by rail and water and addresses the issue of impact of development on local road networks.
10.12	Highways Agency, Network Operations SE	The Plan should seek to promote transportation of waste by rail or waterborne modes wherever this may be possible, particularly to support the export of waste. No information has been supplied to show that the existing capacity of the SRN or the implications of the Waste Plan proposals on the SRN have been appraised. In accordance with PPS12 requirements, the increased emphasis on evidence-based plans means it is more likely that an evaluation of the transport impact of the Waste Plan proposals will be required. Attached a note produced by the HA, which broadly advises that the level of assessment	As noted above, the criteria used to select the sites in the Draft Plan includes proximity to the Transport for London Road Network and/or Strategic Road Network. Because specific technologies or uses are not identified for specific sites in the Draft Plan, it is not possible to identify more detailed transport impacts at this stage. Therefore, the approach taken by the Draft Plan is for transport impacts to be identified at the planning application stage. This is specifically covered in policy 2.

Ref	Source	Q10 Consultation comments	WLWP response
		<p>required is related to the likely impact on the SRN. The note also provides guidance on potential methods of assessment. It is recommended that the number, size and distribution of waste management facilities should be informed by this evidence base. Spatial distribution options which are likely to have a significant impact on the SRN would not be deemed appropriate, unless mitigation measures are identified to minimise the impact to ensure a nil-detrimental effect. The absence of such an evidence base would mean that the Plan would not be in line with PPS12 soundness requirement that it is 'justified'².</p> <p>It is also vital for mitigation measures to be identified to ensure that impacts caused by waste management and disposal sites on the SRN are mitigated, and therefore demonstrate that the sites are deliverable and the Plan is 'effective'.</p> <p>This is also inline with advice set out in PPS10 and the London Plan that the capacity of the transport infrastructure should be considered, and the full transport impact of all collection, transfer and disposal movements should be taken into account for the selection of waste management sites, as outlined in page 30 of the WLWP.</p> <p>The HA would also like to emphasise that where developments are likely to have significant transport implications, Transport Assessments should be prepared, including a Travel Plan. The requirement for a Travel Plan should apply to all types of development, including waste management sites. Sustainable measures that are offered through these plans should be secured via appropriate planning mechanisms, and travel plans should specifically require the consideration of targets, monitoring, incentives for compliance and a funding stream to maximise their potential for success.</p>	
10.13	Port of London Authority	It is stated that "such sites could be developed due to their ability to exploit alternative transport modes such as rail or water (this is discussed further in Issue 6)". However, on the website when you download Chapter 12 Issue 6 Transport, you get Chapter 6 Existing Capacity of Waste Facilities in West London so unable to comment at this time.	Apologies for this glitch on the website, which has now been resolved. Chapter 12 was available online in the full version of the report.

Ref	Source	Q10 Consultation comments	WLWP response
10.14	Resident, Ealing	Use bio-diesel from used cooking oil and methane from anaerobic digestion for collection vehicles. The resulting reductions in emissions would lead to greater compliance and cooperation from the residents.	This is an interesting idea, but outside the scope of this Plan.
10.15	SITA UK	<p>Favour Option 4, do nothing and encourage waste travel by alternative transport methods and assess at the planning application stage.</p> <p>The other options may prejudice existing waste management sites and areas identified in the London Plan that are otherwise acceptable for waste management development. Some sites may have other attributes and potential that may outweigh any disadvantages with regard to its closeness to alternative modes of transport. The viability of developing alternative modes of transport for local should be carefully considered, including the infrastructure requirements for waste to be delivered to the facility. The distribution of facilities will have a role in determining a preference for alternative modes of transport.</p>	The site assessment criteria include potential for alternative transport, alongside other criteria
10.16	Teddington Society	Prioritise sites allowing access to transport <u>alternatives</u> to roads. Tube transport must come in as a high priority, and this could make systems independent of roads/wharfs etc.	The site assessment criteria include potential for alternative transport, alongside other criteria
10.17	WLWA	Do nothing to encourage waste travel by any alternative transport methods and continue the existing approach of assessing alternative transport opportunities at the planning application stage (e.g. through transport assessments). WLWA suggest that the WLWP should focus on the total environmental and carbon impact of waste management rather than having separate approaches focusing on transportation of waste. The risk with some of the priorities identified above may lead to the exclusion of some existing waste facilities, which have protected status under the London Plan, if they are not close to the main road network. There is a danger that prioritising sites based on their proximity to the road network also assumes that there would be spare capacity on the existing network for more vehicles which may not be the case.	See 10.1 above. The Draft Plan addresses the London Plan requires that all existing waste sites are safeguarded, or equal and compensatory sites provided. Any site included in the Draft Plan will still need to meet the requirements of the Draft Plan policies, including policy 2 which addresses the impacts on the local road network.

Question 11: Do you agree with the monitoring framework? If not, please state why.

Ref	Source	Q11: Consultation comments	WLWP response
11.1	British Waterways London	The indicators should also record the method of transportation of waste, including that transported by water, to assess the sustainable transport of waste.	The monitoring framework in the Draft Plan provides for additional indicators to measure performance against specific policies. It may be possible to monitor development of sites which have capacity for sustainable transport of waste.
11.2	Environment Agency	We agree with the proposed monitoring framework, but would like to see it extended to take account of issues highlighted in the preceding questions, along with a commitment to implement further monitoring, should better data become available for C & I waste and CDEW. The monitoring process needs to take account of the markets for recycle and locational criteria of reproprocessors.	The importance of ongoing monitoring C & I (commercial and industrial) waste and CDEW (construction, demolition and excavation waste) is accepted and has been included in the monitoring framework in the Draft Plan.
11.3	Friends of the Earth, Brent	Level of emissions produced as a result of waste management and disposal in West London should be monitored and that data is made available to the public.	While this is an important issue, this data is not currently readily available, and could not be collated within the Plan monitoring framework.
11.4	Friends of the Earth, Hillingdon	Monitoring of all/total waste by management type.	Agreed, and it has been included in the monitoring framework in the Draft Plan. It is difficult to obtain up to date data on most waste streams but where data is available it will be included in the monitoring of the WLWP.
11.5	Friends of the Earth, Richmond & Twickenham	We think that the level of greenhouse gas emissions produced as a result of waste management and disposal in West London should be monitored.	While this is an important issue, this data is not currently readily available, and could not be collated within the Plan monitoring framework.
11.6	GLA	A monitoring framework is welcomed. Please ensure most up to date data is used in the development of this plan.	Agreed. It is difficult to obtain up to date data on most waste streams but where data is available it will be included in the monitoring of the WLWP.
11.7	GOL	We agree that establishment of the proposed monitoring framework outlined in section 13 is very important in order to enhance existing knowledge about waste arising in terms of both amount and capacity of new management facilities	Monitoring framework included in Draft Plan.

Ref	Source	Q11: Consultation comments	WLWP response
		within the WLWP area.	
11.8	SITA UK	No. The monitoring framework is considered to be restrictive and should include monitoring for all waste streams.	The importance of ongoing monitoring of all waste streams is accepted and has been included in the monitoring framework in the Draft Plan. However, it is difficult to obtain up to date data on most waste streams but where data is available it will be included in the monitoring of the WLWP.
11.9	Teddington Society	Systems of up-to-date monitoring could have been improved in the past, and proposals appear to be sensible. We should be seeking new efficient methods of monitoring and be seen to be leading in this field.	Monitoring framework included in Draft Plan.
11.10	WLWA	The monitoring of the WLWP based on waste arisings is welcomed, particularly in view of the over estimation of waste growth made in the London Plan. Whilst the amounts of municipal waste arisings are accurately recorded by the Authority and its constituent boroughs, quantities of other waste have not been measured. However it is appropriate that the total waste arisings, especially commercial and industrial waste, within the west London area should be assessed and measured on an on-going basis and form part of the monitoring process for the WLWP.	Monitoring framework included in Draft Plan.
11.11	Online questionnaire	Specific "success criteria" should be set plus some guidance on how to measure the success criteria. Measurement of waste is difficult and thought needs to be given on how to improve measurement techniques. A cumulative improvement in measurement techniques would help the cost-benefit analyses which are (presumably) being used in this project.	It is agreed that accurate measurement is important. However, it is difficult to obtain up to date data on most waste streams but where data is available it will be included in the monitoring of the WLWP.
11.12	Online questionnaire	Yes, but with the addition of a measure of the energy efficiency of the types of waste management methods employed.	This is an important issue, but it is not practical to collect information on it as part of the monitoring framework.
11.13	Online questionnaire	These are just words with no bite, meaning or guidance. If LPAs don't meet targets what are punitive measures?	The role of the Plan is to propose sites to allow for West London's Waste to be dealt with in a sustainable way. Punitive measures are outside its scope.

Ref	Source	Q11: Consultation comments	WLWP response
11.14	Online questionnaire	Monitoring should also include the impact of waste handling on the environment, particularly air and water pollution. It should also include monitoring of efforts to reduce the volume of waste arising.	Total waste arising is included in the monitoring framework. While impacts on water and air are important, this data is not currently readily available, and could not be collated within the Plan monitoring framework.
11.15	Online questionnaire	Agree but be sensitive to the consumer and the environment and watch other areas to see if you can combine resources	Agreed, but not really a monitoring issue as such.
11.16	Online questionnaire	Also need close monitoring of commercial waste and recycling levels, and monitoring of waste reduction. Reducing waste is the top priority, as it is at the top of the waste hierarchy. It needs challenging targets and carrots and sticks to achieve them, especially for commercial waste.	Agreed, and these issues have been included in the monitoring framework. It is difficult to obtain up to date data on most waste streams but where data is available it will be included in the monitoring of the WLWP.
11.17	Online questionnaire	Beyond Indicators W1 and W2, too vague to comment.	More detailed indicators have been included in the Draft Plan.
11.18	Online questionnaire	How much freedom will LAs have to implement local solutions?	The West London Waste Authority has the responsibility for the management of municipal waste arising in the 6 west London boroughs. The role of the Plan is to provide sites to allow this to happen, and it does not control local provision.
11.19	Online questionnaire	Use plain English not jargon to allow the average person to understand fully the implications of plans. To use jargon is to unfairly disadvantage the less affluent areas.	We have endeavoured to use plain English in writing the WLWP whilst keeping jargon to a minimum. We have also included a glossary of terms within the appendices. The Draft Plan consultation includes a short questionnaire for the general public, as well as a longer technical questionnaire.
11.20	Online questionnaire	Questionnaires should be short, simple and to the point!	Agreed. The Draft Plan consultation includes a short questionnaire for the general public, as well as a longer technical questionnaire.
11.21	Online questionnaire	Plans need to be MUCH clearer for residents to make any valid judgement on what you are proposing	Agreed. The Draft Plan consultation includes a short questionnaire for the general public, as well as a longer technical questionnaire.
11.22	Online questionnaire	No as it does not truly listen to the residents and their location to already live locations.	Specific locations are defined in the Draft Plan.
11.23	Online	You should write things in Plain English.	We have endeavoured to use plain English in writing the WLWP whilst keeping jargon to a minimum. We have also

Ref	Source	Q11: Consultation comments	WLWP response
	questionnaire		included a glossary of terms within the appendices.

Other comments

Ref	Source	Other comments.	WLWP response
12.1	British Waterways London	Also worked with TfL in the development of a prototype multi-modal refuse collection vehicle (MMRCV) which will facilitate the movement of 10 tonnes of consolidated waste per container between the road, rail and water (barge) as outlined in 'Developing a Multi-Modal Refuse Collection system for London' November 2008 which can be viewed on line. Planning permission was granted by Hammersmith and Fulham for Powerday - a new wharf at Old Oak Sidings, Willesden Junction (planning ref 2003/3409/FUL) - for the movement of 1.6mtonnes of materials and waste streams pa.	The Draft Plan aims to support the transport of waste by water and rail. This issue has been included in the site assessment process, and is also supported by policy 2.
12.2	Business, Brent	The time plan seems very long.	The WLWP must cover a 10 year period from the time it is likely to be approved. The Draft Plan actually covers the period to 2026, to reflect the scope of individual borough Core Strategies.
12.3	CABE	Robust design policies should be included within all LDF documents and the Community Strategy, embedding design as a priority from strategic frameworks to site specific scales. Local planning authorities' officers and members should champion good design. Treat design as a cross cutting issue. Check CABE publications.	Design is addressed in policy 2 in the Draft Plan.
12.4	Civil Aviation Authority	General list of development / aviation related issues for background info - not pertaining to waste - including Other Civil Aerodromes, Telecom installations, Wind Turbines, High Structures, Venting and Flaring.	Aerodrome issues have been included in site assessment criteria.
12.5	Ealing residents' associations' meeting 30 March 2009	Don't want Park Royal to be considered as just an industrial area as there are lots of residents. The area always appears in the top 10 most polluted areas of London. There should be focus groups for people to ask about the various technologies. Clarification requested re if an existing site is used would a	The review of potential sites undertaken in developing the Draft Plan used a number of different sources of information in identifying potential sites. These sites were reviewed using a range of criteria, including proximity to residential areas. As a result of the review, a number of sites in Park Royal have been included in the Draft Plan.

Ref	Source	Other comments.	WLWP response
		<p>new planning application be sought? We don't want historical conditions carried over. Is it possible to have new criteria? Residents want the impact of Powerday site taken into consideration.</p> <p>Some concerns and questions were expressed about the consultation process:</p> <ul style="list-style-type: none"> • Why they hadn't heard about the November meeting in Ealing town hall. • When they nominate the sites - how widely will the council notify people locally? • In the past council has said look at the website but many people don't have access to a computer. 	<p>The Residents' Association's concerns about the impacts on local residents are understood, and these are issues which can be considered further in the consultation process on the Draft Plan. It should be noted that if any of the sites were to be developed, they would need to be the subject of a planning application, and any proposed development would need to meet the requirements of WLWP policies, including the policies in draft policy 2, which addresses a wide range of potential impacts. With regard to the specific question about an existing site, if it was redeveloped for a new use, it would require a new planning application (although Council will need to look at the final judgement), and would need to meet the requirements of the Plan.</p> <p>In terms of the comments on the consultation process:</p> <ul style="list-style-type: none"> • The public meeting was advertised through a direct mailing to organisations on its consultation list by the Council, in the Borough magazine "Around Ealing" in October and November, through a press release, through a leaflet and poster, and through the website. • The nominated sites have been included in the Draft Plan. We recognise the importance of circulating the information as widely as possible, and realise that many people do not have access to the internet. In addition to the previous methods of circulating information, all those who have expressed an interest will be directly contacted, along with community groups. We will also look at other methods of circulating information and hope to generate more media interest in this stage of the Plan.
12.6	Environment Agency	<p>Capacity and facility types: Although not covered directly by a specific question, we believe that there could be a widening of the debate on this issue. The capacity of facilities has been measured using data on permitted capacity (set in fairly broad bands for charging), however as stated, this is not</p>	<p>WLWP will contact the Environment Agency to discuss the first two points.</p> <p>Flood risk has been addressed in the site appraisal process.</p>

Ref	Source	Other comments.	WLWP response
		<p>likely to be the true throughput for any given facility for a number of reasons. We believe the plan should seek to obtain more accurate data (we can help with this) in order to better inform the monitoring process.</p> <p>The issue of facility type is not as widely discussed as that of capacity, however it is critically important as certain facilities may only be able to accept certain types of waste, thus creating a greater gap in treatment capacity (i.e. a high proportion of treatment/recycling of CDEW as opposed to C & I waste). In the present scenario the majority of waste is being exported outside of the plan boundary using the existing transfer facilities that comprise the majority of permitted capacity. We believe that if much less of this waste were to be exported, that there would be an economic impact on the mix of existing facilities. We believe that this chapter needs to have a greater exploration of these issues (or cross-referencing to discussion in other places within the document).</p> <p>It is of concern that the document makes no reference to flood risk or proximity to watercourses as a key constraint to the development of waste sites. No reference is made to PPS25 and the need to undertake a Strategic Flood Risk Assessment (SFRA), nor is the Thames Catchment Flood Management Plan (CFMP) referred to. It is vital that an SFRA is undertaken, this should be easy as all of the six LPAs have an SFRA that can be used. I would also expect that the waste DPD seeks opportunities to achieve the goals of the CFMP looking at strategic options to reduce flood risk. We may find a document unsound if flood risk is not fully considered when allocating sites and developing policies. To discuss the requirements of the SFRA, please contact Lydia Burgess-Gamble on 01707 632402. If you have any other queries, please contact Deborah Simons on 01707 632390,</p>	
12.7	GLA	In terms of indicative land take and the number, type and scale of technologies anticipated to meet apportionment it is noted that the document looks to plan ahead of the London	The Draft Plan covers a time period to 2026, which allows for a 15 year period from approval, in line with core strategy planning horizons. An apportionment has been calculated up

Ref	Source	Other comments.	WLWP response
		<p>Plan 2020 vision to the year 2025. However, it should be noted that apportionment can only be considered up to the year 2020 as per the London Plan figures and methodology available to date since the London Plan data has been approved through extensive consultation and by Examination in Public.</p> <p>Consideration should be given to the London Plan policies (4A.6, 4A.7, 4A.8, 4A.23), on climate change and the co-location of new waste facilities and decentralised energy systems such as combined heat and power (CHP) and combined cooling, heat and power (CCHP). Such consideration should be given when devising the criteria for assessing suitable sites and technology for resource recovery. Opportunities for local energy and heat use should be favoured and their positioning in relation to existing and potential heat networks (as identified in policy 4A.5 of the London Plan) should be considered for any waste to energy plant or any waste facilities where co-location of waste to energy would be beneficial.</p>	<p>to 2026. This has been based on the same ratio of apportionment compared to waste arisings for 2020.</p> <p>Draft Plan policy 3 supports the provision of decentralised energy systems.</p>
12.8	GOL	<p>Advice on timetable: PINS advise that the pre hearing meeting should usually take place 8 weeks after the submission date and they would expect 14 weeks between submission and the start of the hearing sessions. We would therefore advise that the date for the pre examination meeting is April with the examination hearing sessions scheduled to start in May 2011. For most DPDs PINS advises allowing 26 – 29 weeks from submission for receipt of final Inspector’s report so if received in September / October this should enable you to meet the end of 2011 adoption date.</p> <p>In terms of the time period covered ideally waste DPDs should share the 15 year time horizon of Core Strategies. In the case of your DPD with an anticipated adoption date of 2011 this would mean until at least 2026. However, given the need to bring forward waste policies and allocations as soon as possible, the difficulties with preparing joint documents and the slippage that has already occurred with Core Strategies, a</p>	<p>In terms of the timetable, it is now anticipated that the Plan will be adopted by October 2012, with the examination being held in April 2012.</p> <p>The Draft Plan covers a time period to 2026, as suggested in the comments.</p> <p>The Draft Plan considers the potential for intensification or re-use of existing waste sites.</p>

Ref	Source	Other comments.	WLWP response
		<p>pragmatic way forward is required. Therefore we advise that if sub-regional Borough groupings or individual Boroughs can plan for waste over a 15 year time horizon in a Joint Waste DPD or Core Strategy without delaying their overall programme we would encourage them to do this.</p> <p>In terms of indicative landtake and the number and type of additional facilities anticipated to meet apportionment we note that the draft document looks ahead to 2025. If you are not already in discussion with the GLA about your post 2020 apportionment methodology it is very important that you do so at the earliest possible opportunity to ensure compatibility with existing and developing London Plan policy.</p> <p>In terms of safeguarding existing sites, it would be sensible to include these sites in the DPD so that there is a coherent strategy for waste management in place, in the one document, that is clearly in general conformity with the London Plan requirements.</p> <p>Section 6 notes that whilst across the six boroughs there is a total of 6,425,000 per annum of licensed capacity for handling waste, this is predominantly waste transfer capacity. As is noted here, within the London Plan transfer facilities are not classed as waste management capacity. If transfer capacity is excluded section 7 reveals that without additional capacity West London will increasingly be unable to meet the apportionment figures from 2010 onwards. Clearly, as noted in section 7, if existing transfer stations were to be redeveloped as treatment facilities the need to identify additional sites could be reduced. Demonstrating the delivery of sites able to handle the apportionment figure will be a key matter to address when the plan reaches publication and submission stages. In drawing up the list of potential sites, is it likely that these will be prioritised for coming forward to manage waste? In the plan led spatial planning system it will be important to not only physically identify the sites needed but also - in terms of PPS 12 (para 4.10) reasonable prospects</p>	

Ref	Source	Other comments.	WLWP response
		of delivery test - be able to demonstrate deliverability to the Inspector. Whilst it may not be appropriate to include all the detail on individual sites within the DPD itself it will be important to have done this work - including the scope for transfer sites to become treatment facilities - and to be able to show this in supporting documentation used to underpin what is said in the DPD. The general advice given in PPS12 (paras 4.45 - 4.47) on deliverability, flexibility and monitoring although couched in terms of Core Strategies might equally apply to your joint waste DPD.	
12.9	Greener Harrow	Where are the drivers to minimise primary waste & residual waste? Facility tonnage only seeks to encourage capacity utilisation. No measure of sustainability of waste processing facilities.	Draft Plan policies seek to ensure waste is managed according to the waste hierarchy.
12.10	Hampton Wick Assoc	Waste of time and money to drive to Kew when can just drive over the bridge to use Kingston waste disposal site.	This is accepted, but it is not an issue that the Plan can address.
12.11	Highways Agency, Network Operations SE	HA would have concerns if any material increase of traffic and/or safety concerns occur on these sections of the SRN (M25, M4, M40, M3, M1 and sections of the A40, A30, A316, A3113 and the A3) without careful consideration to mitigation measures.	The Draft Plan policy 2 addresses impacts on the road network.
12.12	Metropolitan Police Authority	Mindful that PPS1 states that councils should prepare development plans which promote inclusive, healthy, safe and crime free communities. Also circular 05/05 para B9 advises that developers may be expected to pay for or contribute to the cost of all, or that part of additional infrastructure provision which would not have been necessary but for their development. Strategic policy - various refs to London Plan 3.99, 3A.17, 3A.18, 3A.26.	Draft Plan policy 2 deals with potential impacts of development on local communities.
12.13	Chairperson, South Ruislip Residents' Association	Table no. 5-9 on page 40 gives considerable concern because of the extra traffic that would be associated with a new facility at Stonefield Way/Victoria Rd. The traffic generated from the use of the West Waste refuse transfer facility already creates a considerable problem. That problem is recognised by LB Hillingdon who recently engaged MVA Consultants to assist them in finding a solution to the long running problem of heavy freight traffic entering and leaving South Ruislip. Part	See response to this issue under question 7 comments.

Ref	Source	Other comments.	WLWP response
		<p>of that problem is the heavy traffic going to the West Waste site and the other licensed Waste Transfer site in Civic Way operating by Gowing and Pursey. We therefore request the removal of Preferred Industrial Location at Stonefield Way/Victoria Road, Hillingdon to be removed from the list.</p>	
12.14	Teddington Society	<p>Objective: Ensure that there is a greater reduction of waste at source, and seek that Local Authorities themselves take a more positive attitude to recycling <u>all</u> materials.</p> <p>To achieve these policies we seek a greater co-operation between Local Authorities – not just members within the WLWA, but those adjoining.</p> <p><u>Page 16. Para 5.4.</u> We feel that there should be more up-to-date and accurate measuring of waste, of whatever type.</p> <p><u>Page 32. Chapter 1. Issue 5. Approaches to treatment. 7. 11.1. (2)</u> Is there a definite reason why green composting cannot be carried out in a built up area? There could be immediate benefits to communities if composting was to be carried out locally.</p> <p><u>11.1(4)</u> Clearly, high efficiencies are required for each and every site, but there is a necessity to examine whether small sites and ones near to a built up area are necessarily inappropriate? Some sites, if smaller, might essentially be near housing to give greater benefit to that housing eg heat draw off, and local heating benefit.</p> <p>We are unsure why lower efficiencies than 65% need to be classified as disposal.</p> <p><u>11.3 Large versus small</u> Definitions are lacking.</p> <p>[More info supplied on examples of waste management]</p>	<p>Please note the comments in section 2.1 on waste minimisation and waste arisings data. The importance of monitoring of waste arisings is agreed, and the Draft Plan monitoring framework outlines the data that will be collected.</p> <p>Green waste composting can be carried in built-up areas, though there are strict regulatory requirements which are likely to rule out large scale 'open' composting.</p> <p>The efficiency limits and definitions are set out in the Waste Framework Directive.</p> <p>Thank you for the waste management information.</p>

Ref	Source	Other comments.	WLWP response
12.15	Resident, LB Ealing	Why was the timetable extended to 2025? And how will the programme be funded - by PFI/PPP perhaps?	The Draft Plan now covers a time period to 2026, which allows for a 15 year period from approval. This has been done so that it is the same as the time span which the local borough Core Strategies plan for.
12.16	Resident, LB Ealing	No more sites in this [Powerday Recycling Plant] area please due to existing environment impacts.	Concerns about local impacts are understood. Please see reply to the Ealing Residents' Association comments above.
12.17	Resident, LB Hillingdon	Build a proposed London Island Airport out of waste which will negate the need to build a third runway at Heathrow.	This is beyond the scope of this Plan.
12.18	Resident, LB Hillingdon	The Edmonton and Colnbrook Incinerators are working well under capacity and need to be utilised to the full before building another is considered.	The Draft Plan provides for sites for new waste facilities, but does not define the technologies that will be used. However, see comments in section 2 about promoting new technologies rather than conventional incineration.

Appendix A: Attendance at meetings

The organisations who attended consultation meetings are listed below. Individuals are not listed for the sake of privacy.

Public meetings

Brent: Town Hall Wembley Wednesday 29th October 2008

Approximately 30 people attended. This comprised local residents and other interested parties including:

Local Councillors:

- Cllr Janice Long
- Cllr Irwin van Colle
- Cllr Robert Dunwell (who also represents Barn Hill Residents Association and QARA Group)

Representatives/members from the following organisations and businesses:

- Friends of the Earth
- Brent Council's Streetcare unit
- Mapesbury Residents Association
- Queen's Park Area Residents Association
- Energy Solutions
- Arab Community Association in Brent

Ealing: Town Hall Tuesday 25th November 2008

Approximately 40 people attended. This comprised local residents and other interested parties including:

Local Councillors:

- Cllr Katherine Crawford
- Cllr Diana Pagan
- Cllr Jim Randall
- Cllr John Ross

Representatives/members from the following organisations and businesses:

- Central Ealing Residents Association
- Ealing Friends of the Earth
- Green Party
- Island Triangle Residents Association

Harrow: Civic Centre, Tuesday 2nd December 2008

Approximately 30 people attended. This comprised local residents and other interested parties including:

Local Councillors:

- Cllr Camilla Bath
- Cllr Mrinal Choudhury
- Cllr Susan Hall
- Cllr Nizam Ismail
- Cllr Eileen Kinnear

Representatives/members from the following organisations and businesses:

- Harrow & Hillingdon Geological Society
- Harrow Agenda 21 Waste & Recycling Group
- Merryfield Gardens Residents
- Nugents Park Residents Association
- Roxborough Road Residents Association

Hillingdon: Civic Centre, Uxbridge, Monday 1st December 2008

Approximately 60 people attended. This comprised local residents and other interested parties including:

Local Councillors

- Cllr George Cooper
- Cllr Judith Cooper
- Cllr Graham Horn
- Cllr Allan Kauffman
- Cllr Mary O'Connor
- Cllr Andrew Retter
- Cllr David Routledge

Representatives/members from the following organisations and businesses:

- Alex Associates
- Brunel University
- Carey Group Plc
- Chimes Shopping Centre
- Eastcote Residents Association
- Harmondsworth & Sipson Residents Association
- Hillingdon Friends of the Earth
- Hillingdon Natural History Society
- Ickenham Conservation Advisory Panel
- Ickenham Residents Association
- Initial Medical Services
- Inland Waterways Association
- Kalkwik
- Metropolis PD
- Ruislip Residents Association
- South Ruislip Residents Association
- SRRA
- West Drayton & District Local History Society
- Workspace Glebe Ltd

- Yiewsley & West Drayton Town Centre Action Group
- Yiewsley Community Involvement Group

Hounslow: Civic Centre, Hounslow, Thursday 27th November 2008

Approximately 20 people attended. This comprised local residents and other interested parties including:

Local Councillors:

Cllr. Ruth Cadbury

Representatives/members from the following organisations and businesses:

Inland Waterways Association

Planning Perspectives

Brett Group

Richmond upon Thames: Curriculum and Training Centre, Twickenham Wednesday 10th December 2008

Approximately 20 people attended. This comprised local residents and other interested parties including:

Local Councillors:

- Cllr Geoff Acton
- Cllr Martin Elengorn

Representatives/members from the following organisations and businesses:

- The Teddington Society
- Green Party
- Friends of the Earth

Follow up meetings

Ealing Friends of the Earth meeting, St. John's Church Hall, 18 March 2009

Attended by 15 members of Friends of the Earth.

Ealing Residents' Association, INCO, Bashley Road, North Action, 30th March 2009

Attended by approximately 25 members.

Appendix B: Questionnaire

Question 1: Do you agree with the proposed spatial vision and strategic objectives of the WLWP and the WLWP plan making process?

Question 2: What other strategic objectives, if any, would you suggest

Question 3: Are there any other key policies the WLWP should address in respect of waste?

Question 4: How much land should the WLWP provide to manage West London's waste?

Options:

1. Make provision only for the quantity of waste apportioned to West London through the London Plan; or
2. Make more sites available to manage even more of West London's waste, being as self sufficient as possible; or
3. Make provision for the apportionment and some extra provision to allow for contingency; or
4. Another option (please specify).

Question 4A: Please suggest any sites which you consider to be suitable for waste management facilities.

Question 5: Should we account for Hazardous waste when making provision for waste management facilities?

Options:

1. Include capacity provision to manage Hazardous waste arising; or
2. Assume Hazardous waste is managed elsewhere and make a small provision for what may need to be treated or disposed of; or
3. Make no provision for Hazardous wastes.

Question 6: Should we account for Construction, Demolition and Excavation wastes when making provision for waste management facilities?

Options:

1. Include capacity provision to manage CD&E waste arising; or
2. Assume CD&E waste is managed on site and therefore make a small provision for what may need to be disposed of; or
3. Make no particular provision for CD&E wastes.

Question 7: Do you think the site and location assessment criteria listed in paragraph 10.2, which are derived from PPS 10 and the London Plan, are appropriate in selecting sites for waste management facilities within West London?

Options:

1. The location and site assessment criteria as specified in paragraph 10.2 above are sufficient; or
2. The location and site assessment criteria as specified in paragraph 10.2 above alone are not sufficient and need to be developed to provide a more detailed set of criteria specific to West London. Please suggest other criteria.

Question 8: How should we allocate sites with respect to the type of waste management activity taking place on each site?

Options:

1. Allocate specific technology types to specific sites; or
2. Allocate sites for general waste use; or
3. Allocate sites that are suitable for a given range of specified facility/technology types; or
4. A combination of the above options so that some sites are specific for certain technologies and other sites will be suitable for a mixture of technologies.

Question 9: Which of the following options offers the best approach for

maximising capacity of waste management facilities within West London?

Options:

1. A centralised approach that relies on a fewer number of large facilities;
or
2. A de-centralised approach that is based on a larger number of smaller facilities; or
3. A hybrid of these two approaches. A hybrid of these approaches would see sub-regional clusters of larger sites, perhaps with multiple facilities, combined with a larger number of smaller sites either supplying waste to these larger sites and facilities or bulking recyclables for onward movement.
4. Can you suggest any alternatives to the above?

Question 10: Which of the following five options provides the most suitable method relating to the sustainable transport of waste within West London?

Options:

1. Prioritise sites offering access through a range of the modes i.e. road, rail and navigable water;
2. Prioritise sites at locations allowing access to transport alternatives to road i.e. have wharves for water access and/or rail depots; or
3. Prioritise sites at locations providing access just to main road networks; or
4. Prioritise sites whose locations offer suitable access via any road networks; or
5. Do nothing to encourage waste travel by any alternative transport methods and continue the existing approach of assessing alternative transport opportunities at the planning application stage (e.g. through transport assessments).

Question 11: Do you agree with the monitoring framework as set out above?
If not please state why?