

	<b>Corporate Director Neighbourhoods and Regeneration Delegated Decision</b> 24 November 2025
	<b>Report from the Director Inclusive Regeneration and Climate Action</b>
	<b>Cabinet Member Regeneration, Planning and Property (Councillor Teo Benea)</b>
<b>West London Waste Plan Regulation 18 Consultation</b>	
<b>Wards Affected:</b>	All
<b>Key or Non-Key Decision:</b>	Key decision
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>List of Appendices:</b>	Appendix A: Regulation 18 Draft West London Waste Plan Appendix B: Regulation 18 Draft West London Waste Plan Site Plans ('Appendix 3' of the Plan document)
<b>Background Papers:</b>	None
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## 1.0 Executive Summary

- 1.1. This report explains the background to, content of and proposed consultation arrangements for the emerging 'Regulation 18' draft updated West London Waste Plan (WLWP), which has been prepared to manage waste related development in the boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond Upon Thames. The WLWP also relates to those parts of Brent and Ealing covered by the Old Oak and Park Royal Development Corporation (OPDC). It seeks approval to consult on the draft WLWP for an eight week period, commencing in late 2025.

## **2.0 Recommendation**

- 2.1 That the Corporate Director Neighbourhoods and Regeneration in Consultation with the Cabinet Member Regeneration, Planning and Property:
- a) Consider the contents of this report and the draft updated West London Waste Plan attached at Appendix A.
  - b) Approve the consultation on the draft updated West London Waste Plan ('Regulation 18' consultation) based on the consultation arrangements outlined in paragraph 3.26 of the report.
  - c) Delegate to the Head of Planning (in consultation with the Corporate Director of Neighbourhoods and Regeneration) authority to make minor modifications to the draft document prior to consultation (in conjunction with other participating boroughs).
  - d) Note that, subject to response rate and complexity of responses, officers will aim to formally report the outcomes of the consultation to the Cabinet Member for Regeneration, Planning and Property in Spring 2026, when it is anticipated that approval will be sought for 'Regulation 19' consultation on the draft updated West London Waste Plan.

## **3.0 Detail**

### **Contribution to Borough Plan Priorities & Strategic Context**

- 3.1 The West London Waste Plan (WLWP) is one of the key documents in the Council's policy framework and the emerging updated version will replace the current version which was adopted in 2015. It is anticipated that the policies of the emerging West London Waste Plan will contribute to the achievement of the five strategic priorities set out in the Borough Plan. Policy WLWP 1 seeks to retain and optimise essential waste infrastructure which, together with associated economic activity, will help to deliver the Borough Plan's priority of 'Prosperity and Stability' in Brent. Policy WLWP 4 which promotes high quality and resilient waste facilities and Policy WLWP 6 which requires proposals for waste related development to incorporate circular economy principles and promote resource efficiency will contribute to delivering the priorities of 'A Cleaner, Greener Future', 'Thriving Communities', 'The Best Start in Life' and 'A Healthier Brent'.

### **Background**

- 3.2 Brent's Cabinet (Cabinet Report 8th September 2025: Brent Development Plan Documents Review) delegated authority to the Corporate Director Neighbourhoods and Regeneration in consultation with the Cabinet Member Regeneration, Planning and Property to approve Development Plan consultation material to be issued in the stages prior to any final draft plan proposed to be submitted for examination. This included following this approach to delegation for the West London Waste Plan consultation.

- 3.3 In line with this approach, the recommendation is for the Corporate Director Neighbourhoods and Regeneration in consultation with the Cabinet Member Regeneration, Planning and Property to approve the 'Regulation 18' consultation on the draft updated West London Waste Plan based on the consultation arrangements set out in this report. It is also recommended that authority is delegated to the Head of Planning (in consultation with the Corporate Director of Neighbourhoods and Regeneration) to make minor modifications to the draft document prior to consultation.
- 3.4 The current West London Waste Plan, which was adopted in 2015, is considered in many respects to be 'out-of-date' in the context of national and regional planning policy. Plans regarded as not being up-to-date have less weight in planning decision-making. The WLWP therefore needs to be updated or replaced. The process of preparing a new WLWP includes statutory consultation periods. Agreement is required from each of the participating authorities to undertake consultation. The new WLWP is being prepared in the context of the Government's expected December 2026 submission deadline (for plans to progress under the current plan making system) and delegated authority to carry out minor amendments to the WLWP prior to consultation is necessary to allow the process to continue in a timely manner.

### **The adopted West London Waste Plan**

- 3.5 The adopted West London Waste Plan contains seven policies that are used to determine planning applications related to waste development across the WLWP area. It identifies site allocations to meet the London Plan (2011) waste apportionments for the management of waste predicted to arise from households, business and industry in the WLWP area up to 2031. A number of other existing waste sites are also identified in the WLWP.

### **The emerging West London Waste Plan**

- 3.6 An updated West London Waste Plan is now being prepared with the support of waste planning consultants BPP Consulting, with input from representatives from each of the West London Boroughs and OPDC (the participating authorities). Its production is being managed by the West London Alliance (WLA). The new document will cover the period up to 2041 (the end of the period of the current London Plan).
- 3.7 The west London Boroughs and OPDC are seeking to submit the updated WLWP to the Secretary of State by December 2026, so that it can be prepared and examined under the current plan-making system and avoid any abortive work associated with the transition to the new plan-making system.
- 3.8 The draft updated WLWP follows a similar format to the adopted WLWP. Key elements include the amount of waste to be managed in west London over the plan period (waste arisings), an updated list of safeguarded waste sites across west London with sufficient waste management capacity to manage

expected waste arisings and updated policies against which planning applications for waste related development will be determined.

### **Waste Arisings in West London**

- 3.9 The starting point for the updated WLWP is the Household, Industrial and Commercial (HIC) waste apportionments set out in the current London Plan (March 2021). The apportionment is the percentage share of London's total predicted HIC waste arisings that each Borough is expected to plan for through to 2041.
- 3.10 The London Plan encourages Boroughs to pool these apportionments. When the HIC waste apportionments for each west London Borough are pooled it means they are expected to manage 25.4% (2,221,000 tonnes) of London's forecast HIC waste arisings between 2021 and 2041. Brent's waste apportionment is 5.0%, which amounts to managing 437,000 tonnes of London's total forecast HIC waste arisings in 2041.
- 3.11 In addition to the HIC waste apportionments, the participating authorities are expected to ensure sufficient capacity is available within the WLWP area for the amount of Construction and Demolition (C&D) waste forecast to arise in west London over the WLWP period, to be managed in accordance with the management targets set out in Policy SI 7 of the London Plan.
- 3.12 The participating authorities are not expected to ensure sufficient capacity is available to manage all the hazardous waste forecast to arise in west London within the WLWP area. Instead, there is an expectation that its management will be planned for in collaboration with neighbouring authorities. Similarly, there is no expectation that excavation waste will be exclusively managed within west London, or London as a whole.

### **Vision and Objectives of the emerging West London Waste Plan**

- 3.13 The draft Regulation 18 WLWP contains a high-level vision which sets out what the WLWP is seeking to achieve by the end of the WLWP period and a series of strategic objectives, that provide a framework to realise the vision. These elements have been developed with input from officers, drawing on the content of the various plans and strategies from each of the participating authorities.

### **Emerging West London Waste Plan policies**

- 3.14 As with the adopted WLWP, the emerging WLWP contains a series of policies against which planning applications for waste related development will be determined. A key aim of the policies is to safeguard existing waste sites. This means that planning applications for other forms of development (such as residential) that result in the restriction or loss of waste management capacity will be resisted, unless suitable alternative replacement capacity is identified elsewhere.

3.15 The policies included in the draft updated WLWP are as follows:

- Policy WLWP 1 – Safeguarding and Optimising the Waste Site Network: Keystone policy to make the most of the existing network of waste sites.
- Policy WLWP 2 – Provision of Additional Waste Management Capacity: Policy making provision for compensatory and windfall (additional) capacity.
- Policy WLWP 3 – Residual Waste Management & Energy Recovery: Policy defining specific conditions under which capacity for the management of residual waste may be supported.
- Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities: Policy setting out waste specific requirements/standards that facilities need to meet.
- Policy WLWP 5 – Recovery and Disposal of Waste to Land: Policy defining specific conditions under which proposals for non-inert landfill, placement of inert waste and excavation/mining of existing landfills may be consented.
- Policy WLWP 6 - Circular Economy & Resource Efficiency: Policy setting out the requirements for proposed development to fulfil certain sustainability criteria.

### **Safeguarded Sites**

3.16 To be in general conformity with the London Plan, the WLWP is required to identify sufficient waste management capacity to manage the projected C&D waste arisings and the total London Plan HIC waste apportionment for west London. The following types of sites are safeguarded in the emerging WLWP for this purpose:

- Sites with extant (existing) planning consents for a waste use;
- Sites with a waste use that is subject to a Certificate of Lawful Existing Use or Development (CLEUD); and
- Sites with a waste use that is deemed to be lawful over time or ancillary to another lawful use.

3.17 Ten sites in the part of the London Borough of Brent for which Brent Council serves as the local planning authority are proposed to be safeguarded in the emerging WLWP. These are set out in the table below. Site plans are included in Appendix B.

<b>Site reference and location</b>	<b>Operator</b>	<b>Types of waste processed</b>
B04: Neasden Sidings, Drury Way, Wembley	Quattro Limited on behalf of WRG (Midlands) Limited	CDEW* (Excavation)
B05: Atlas Road Wembley	O'Hara Bros.	CDEW

	Aggregates Limited	
B06: Unit 4, Second Way, Wembley	HAWK Rubbish Clearance Limited	CDEW
B07: SRC Aggregates Wembley Depot	Sewells Reservoir Construction Limited	CDEW
B10: Unit 28, Fourth Way WTF	Brent Oil Contractors Limited	Hazardous
B12: Unit 2, Hannah Close	London Energy Ltd	CDEW
B13: Alperton Lane Waste Transfer Station	Sortera	CDEW / HIC / Hazardous
B14: Brent Transfer Station, Alperton Lane	Veolia ES (UK) Ltd	HIC
B15: Wembley Transfer Station & Recycling Facility	Biffa Waste	HIC
B16: off Great Central Way, Neasden	L & B Haulage & Engineering Contractors Ltd	CDEW

\* CDEW = Construction, demolition and excavation waste

HIC = Household, industrial and commercial waste

- 3.18 Three sites in the part of the London Borough of Brent for which OPDC serves as the local planning authority are proposed to be safeguarded. These are set out in the table below, with their site plans included in Appendix B.

<b>Site reference and location</b>	<b>Operator</b>	<b>Types of waste processed*</b>
B01: Twyford WTS Abbey Road	West London Waste Authority	LACW
B02: 100 Twyford Abbey Road	Bridgemarts	CDEW
B08: Willesden F Sidings Rail Freight Terminal	Cappagh Public Works Limited	CDEW (Excavation)

\* CDEW = Construction, demolition and excavation waste

LACW = Local Authority collected waste

- 3.19 The WLWP also identifies six existing waste sites across the WLWP area which fall within areas identified for redevelopment in local planning authority Local Plans for non-waste uses. These sites are proposed for release from safeguarding on the basis that the WLWP area has a surplus of waste management capacity and their continued safeguarding and use for waste management may conflict with wider planning and regeneration objectives. If the waste management capacity offered by these sites were to be lost, surplus capacity for the management of HIC and C&D waste would still remain.
- 3.20 Of the six sites, one is in Hounslow, two are in OPDC's area and three are in Brent. The three sites in Brent proposed for release from safeguarding are set out in the table below. These waste sites are all within the 'Neasden Goods Yard' site and are within the area covered by the adopted Local Plan site allocation BEGA1 'Neasden Stations Growth Area' and the adopted Neasden

Stations Growth Area Masterplan SPD. Comprehensive mixed-use redevelopment is envisaged across this area.

Site location	Operator	Consented use*
Mitre Works, Neasden Lane	European Metal Recycling Ltd	Metal recycling (Apportioned waste)
Land at Neasden Goods Yard	X-Bert Haulage	Waste transfer (CDEW)
Unit 6 Neasden Goods Yard	X-Bert Haulage	Waste transfer (CDEW)

\* CDEW = Construction, demolition and excavation waste

### **Evidence Base for the emerging WLWP**

- 3.21 BPP Consulting has prepared a Waste Capacity Report, which assesses the management capacity of existing waste sites across the plan area to determine if the waste apportionments set out in the current London Plan 2021 will be met. A survey of the waste operators that run the principal waste sites across west London has been undertaken to test the findings of this work.
- 3.22 The Capacity Report forms a key part of the evidence base for the emerging WLWP and indicates that at this stage, there is sufficient waste management capacity within existing sites across west London to meet the London Plan apportionments and C&D waste management targets. However, there is a possibility that the waste apportionments could increase as part of the London Plan Review or that the Regulation 18 consultation might find that existing waste sites are no longer available. Officers are therefore of the view that a 'call for sites' exercise should be undertaken as part of the Regulation 18 consultation to invite the submission of potential additional waste sites for consideration for allocation in the draft WLWP.

### **Integrated Impact Assessment and Strategic Flood Risk Assessment**

- 3.23 Land Use Consultants (LUC) were commissioned in October 2023 to undertake an Integrated Impact Assessment (IIA), comprising the Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA), and Habitats Regulations Assessment (HRA) for the emerging WLWP. The IIA appraises the likely environmental, social and economic effects of the vision, objectives and policies. The IIA Report will be published as part of the consultation on the Regulation 18 version of the WLWP.
- 3.24 The key findings of the IIA are that overall, the draft vision, strategic objectives and policies in the Regulation 18 WLWP are likely to have a range of minor positive and significant positive effects, particularly in relation to moving waste management up the waste hierarchy (reduce, reuse, recycle), helping to reduce CO2 emissions, supporting the local economy, and health and wellbeing.

- 3.25 A Strategic Flood Risk Assessment (SFRA) relating to the sites is being prepared as part of the evidence base by Metis consultants.

### **Consultation on the emerging Plan**

- 3.26 The Regulation 18 version of the updated WLWP is scheduled to be issued for consultation in November/December 2025, once it has the necessary authority for consultation by all of the participating authorities. The approach to the consultation process will meet statutory requirements, including the provisions of Statements of Community Involvement (SCI) for each borough. The following methods are intended to be used for the consultation:
- A website-based portal for updates, consultation materials and opportunities for involvement.
  - Information will be published on Borough and OPDC websites and documents will be made available for inspection at main Council Offices and libraries.
  - Notification of the process by each of the participating authorities in line with SCIs, (generally) emailing stakeholders in its area using details held on consultation databases.
  - Key stages of the WLWP production will be publicised using established social media channels (e.g. X (Twitter), Facebook, Instagram).
- 3.27 An online joint launch event is intended to take place at the initial publication of the emerging WLWP at Regulation 18 stage. It is also anticipated that in person drop-in sessions will be held at accessible venues.
- 3.28 There will be a minimum of two consultation periods during the WLWP production process, each lasting at least six weeks. The first will begin following the publication of the draft Regulation 18 version of the WLWP and its supporting documents, with a second taking place once the Regulation 19 proposed submission WLWP is published. If significant new issues arise from the Regulation 18 consultation, a further round (or targeted re-consultation on specific issues) may also be undertaken.
- 3.29 Comments received at all consultation stages will be recorded and a summary report produced. The responses received will be analysed and the findings used to inform the production of the Regulation 19 version of the WLWP that boroughs intend to submit for examination.

### **Options**

- 3.30 There are two options open to the Corporate Director Neighbourhoods and Regeneration in Consultation with the Cabinet Member Regeneration, Planning and Property:
- a) Proceed with the recommendations, or
  - b) Do not proceed with the recommendations

### **Option a)**

- 3.31 The West London Waste Plan is one of the key documents in the Council's policy framework. The National Planning Policy Framework (NPPF) requires local plans to be reviewed and updated as necessary at least once every five years. After this, plans are regarded as not being up-to-date and tend to be given less weight in planning decision-making.
- 3.32 The current WLWP was adopted over 10 years ago. It is being reviewed to provide an up-to-date set of policies to determine planning applications for waste related development and ensure that sufficient capacity is available to manage expected waste arisings over the next 15 years. The updated WLWP will also address the (HIC waste apportionment and management targets for C&D waste set out in the 2021 London Plan.
- 3.33 The Council's Local Development Scheme (LDS) provides a timetable for the review of the documents that form part of the development plan. The current LDS anticipates Publication of the emerging WLWP in Summer 2026, which is consistent with the timetable for the Regulation 18 consultation currently proposed.
- 3.34 Considering the NPPF requirement for local plans to be regularly reviewed and updated along with the benefits associated with an up-to-date WLWP, it is recommended that Option a) is pursued.

### **Option b)**

- 3.35 Option b) would involve not approving the draft updated WLWP for consultation. This decision would delay the adoption of the WLWP, meaning that the participating west London boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond upon Thames and the OPDC would not have an up-to-date Waste Local Plan against which to determine planning applications for waste related development. Significant delay could result in LB Brent not being able to participate in the WLWP update process.
- 3.36 It would also increase the risk of missing the Government's December 2026 submission expectation (for plans to progress under the current plan making system). Considering the benefits to the Council of progressing towards an up-to-date WLWP and the lack of compelling reasons for departing from option a), it is recommended that option b) is not pursued.

## **4.0 Stakeholder and ward member consultation and engagement**

- 4.1 The Cabinet Member for Regeneration, Planning and Property has been briefed at earlier stages. The Cabinet Member for Public Realm and Enforcement has also attended a briefing hosted by the West London Alliance and delivered by the consultants, BPP. Appropriate notifications consistent with the Council's Statement of Community Involvement will be carried out for

the next stages. The proposed Regulation 18 consultation arrangements are outlined in paragraph 3.26 of this report.

## **5.0 Financial Implications**

- 5.1 The preparation of the emerging West London Waste Plan is being coordinated by BPP Consulting, with specialist input from Land Use Consultants (Integrated Impact Assessment) and Metis (Strategic Flood Risk Assessment). The project is being managed by the West London Alliance.
- 5.2 The total cost of the project, covering consultancy services and project management, is up to £29,500 per borough per annum over the plan preparation period, with Brent's contribution covered by the Local Plan review budget.
- 5.3 The cost of not proceeding with the recommendations of WLWP (option 2) would likely result in costs greater than the £29,500 per year for Brent.

## **6.0 Legal Implications**

- 6.1 The Planning and Compulsory Purchase Act 2004 (as amended) ("the 2004 Act") and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) ("the 2012 Regulations") set out the statutory requirements for the preparation of a Local Plan.
- 6.2 Regulation 18 of the 2012 Regulations requires the local planning authority to notify and invite representations on the content of the draft plan to: (i) such specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan; (ii) such of the general consultation bodies as the local planning authority consider appropriate; and (iii) such residents or other persons carrying on business in the local planning authority's area as the local planning authority consider appropriate. Paragraph 3.26 above outlines the proposed consultation arrangements which are considered to meet the statutory requirements.
- 6.3 All representations received during the Regulation 18 stage will be taken into account in helping to shape the Regulation 19 submission draft. The Regulation 19 submission draft will follow the necessary statutory procedures including a further Council decision to proceed to a Regulation 19 stage consultation.

## **7.0 Equity, Diversity & Inclusion (EDI) Considerations**

- 7.1 The Equality Act 2010 introduced the public sector equality duty under section 149. It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Council must, in exercising its functions, have "due regard" to the need to:
  - 1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.

2. Advance equality of opportunity between people who share a protected characteristic and those who do not.
  3. Foster good relations between people who share a protected characteristic and those who do not.
- 7.2 The preparation of the WLWP is being informed by an Integrated Impact Assessment which includes an Equalities Impact Assessment (EqIA).
- 7.3 The Consultation on the emerging WLWP allows stakeholder/resident views on the content of the document and any likely adverse impacts of policies and proposals on equality groups to be identified and carefully considered prior to the preparation of the final plan document.
- 7.4 The proposed submission version of the WLWP (at Regulation 19 stage) will be supported by an updated IIA / EqIA. Consultation arrangements will consider how best to engage with stakeholders having regard to the protected characteristics.

## **8.0 Climate Change and Environmental Considerations**

- 8.1 Climate change and environmental considerations are central to the Vision of the West London Waste Plan. The Vision focusses on allowing waste materials to be managed as a valuable resource, keeping them in circulation through innovative re-use, repair, and high-quality recycling for as long as possible in line with circular economy principles. It advocates a zero-waste to disposal approach, the establishment of a network of Circular Economy Hubs, minimising carbon emissions from west London's waste management system and promoting waste infrastructure that is resilient to climate change. This vision is reflected in the WLWP's Strategic Objectives and in the six draft policies which would be used to determine applications for planning consent for waste related development in west London.

## **9.0 Communication Considerations**

- 9.1 There will be an appropriate level of the Communications team's support to raise awareness, e.g. through council social media notifications to complement the engagement measures set out in the Council's Statement of Community Involvement. Councillors will be made aware of the consultation through the Members' bulletin. The consultation will be hosted either through the Council's consultation portal on the Brent website or through a joint consultation portal with the participating West London authorities. This is currently under discussion. Those on the Council's planning policy database will be notified of the consultation.

### **Related Documents:**

[Cabinet Report 8th September 2025: Brent Development Plan Documents Review](#)

[Adopted West London Waste Plan \(2015\)](#)

[National planning policy for waste \(2014\) GOV.UK](#)

**Report sign off:**

*Jehan Weerasinghe*

Corporate Director Neighbourhoods and Regeneration