



Cabinet
27 July 2026

**Report from the Corporate Director
Neighbourhoods and Regeneration**

**Cabinet Member Regeneration
and Planning
(Councillor Matt Kelcher)**

West London Waste Plan Regulation 19 consultation

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
List of Appendices:	Two Appendix A: Regulation 19 Proposed Submission version of the West London Waste Plan Appendix B: Integrated Impact Assessment Please note, due to their size, the above appendices have been published as a supplementary pack to the main Cabinet agenda The following additional supporting documents are available to view under the heading "West London Waste Plan" via the following link: Brent Local Plan (adopted 2022) Brent Council Appendix C: Schedule of Changes between Regulation 18 and Regulation 19 Appendix D: Regulation 18 Draft West London Waste Plan Consultation Statement Appendix E: Habitats Regulations Assessment Appendix F: Strategic Flood Risk Assessment Appendix G: Strategic Flood Risk Assessment (Appendix B) Members are asked to note that the following additional consultation documents will also be available to view under the above link in advance of the Cabinet meeting:

	Integrated Impact Assessment Non-technical summary • Assessment of existing capacity • Assessment of safeguarded waste sites for release • Construction, demolition and excavation waste arising to 2041 • Hazardous waste arising to 2041 • Strategically Significant Waste Flows • Waste management Topic Paper • Circular Economy Topic Paper • Climate Change Topic Paper
Background Papers:	Adopted West London Waste Plan (2015) National planning policy for waste (2014) GOV.UK
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1.0 Executive Summary

- 1.1. The new West London Waste Plan will form a part of the Local Development Plan and will be used for determining planning applications for waste development within Brent and across West London. The current Waste Plan, adopted in 2015, is now outdated and in need of replacement.
- 1.2. The new Waste Plan identifies sites for waste facilities and provides planning policies to guide decisions on planning applications for those sites, with the aim of reducing waste, increasing recycling and ensuring the proper treatment of waste in line with the waste hierarchy, as close to source as possible. It will help ensure that waste is managed in the most appropriate areas, protecting residents' living conditions and providing environmental and economic benefits.
- 1.3. The draft Plan has been prepared jointly with the London Boroughs of Ealing, Harrow, Hillingdon, Hounslow and Richmond Upon Thames and the Old Oak and Park Royal Development Corporation (OPDC) over approximately two years and includes amendments that have been made in response to comments received through the previous ('Regulation 18') consultation that was carried out earlier this year. The Plan must be submitted to the Secretary of State for examination by a government deadline of 31 December 2026 before its formal adoption (subject to successful examination) by each of the planning authorities. This paper contains the draft policies together with a discussion of

the comments that were received. The full draft plan that will be consulted on has been appended to this paper.

- 1.4. Cabinet approval is sought to undertake public consultation ('Regulation 19') for an eight-week period, commencing in August 2026. A report will then be prepared seeking approval from Full Council in November 2026 that the Waste Plan is approved as "sound", subject to the conclusion of the Regulation 19 consultation, so that the Plan can be submitted to the Secretary of State for examination.

2.0 Recommendations

2.1 Cabinet is requested:

- a) to approve the publication of the proposed submission version of the West London Waste Plan ('Regulation 19') and associated evidence base documents for consultation and consultation arrangements outlined in this report;
- b) to approve delegated authority being given to the Head of Planning and Development Services (in consultation with the Corporate Director of Neighbourhoods and Regeneration) to make minor modifications to the Proposed Submission version of the West London Waste Plan and accompanying documents prior to public consultation, including inserting any outstanding process or background elements, making presentational, typographical and accuracy amendments and finalising evidence base documents (in conjunction with other participating authorities);
- c) to agree that the WLWP in its current form is "sound" and therefore to recommend the Plan as such to Full Council in November, and recommend that Full Council in turn authorise submission of the Plan and associated documents to the Secretary of State for examination, subject to the conclusion of the Regulation 19 consultation. These documents will include the representations received during the Regulation 19 consultation process and any suggested amendments to the Plan in response to these.

3.0 Detail

Cabinet Member Foreword & 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 strategy and policy portfolio 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 The WLWP forms part of the local development plan for each of the participating authorities, alongside the London Plan and each authority's Local Plan and Neighbourhood Plans. The policies within the document are the main consideration when determining planning applications for waste related development and are also relevant when determining applications for non-waste development close to waste sites and developments that involve the production of waste.
- 3.3 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 newer 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.
- 3.4 An updated WLWP has been prepared with the support of waste planning consultants BPP Consulting and 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).
- 3.5 The new WLWP will provide an up-to-date set of policies to determine planning applications for waste related development and ensure that sufficient suitable capacity is available to manage waste in West London over the next 15 years. The updated Plan also provides for the Household, Industrial, and Commercial (HIC) waste apportionment and management targets for construction and demolition waste set out in the 2021 version of the London Plan.
- 3.6 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 and its consultation in the stages prior to any final draft plan proposed to be submitted for examination.
- 3.7 In line with this approach, the Corporate Director Neighbourhoods and Regeneration in consultation with the Cabinet Member Regeneration, Planning and Property approved the 'Regulation 18' consultation on the draft updated West London Waste Plan based on the consultation arrangements set out in the [West London Waste Plan Regulation 18 Consultation Report](#). Authority was 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. The public consultation on the Regulation 18 Draft Updated West London Waste Plan took place between 11th December

2025 and 5th February 2026. Ealing Council hosted the consultation portal on behalf of all the local authorities. Details of the consultation and the consultation documents are available here: [Regulation 18 West London Waste Plan consultation portal](#). The consultation process and responses received are summarised from paragraph 3.26 of this report.

- 3.8 Officers are now seeking approval to publish the Regulation 19 Proposed Submission version of the WLWP (The Regulation 19 version) for comments relating to soundness and legal compliance. This is the version of the WLWP that the participating authorities intend to submit to the Secretary of State for independent examination by the Planning Inspectorate and its production has been informed by the comments received at Regulation 18 stage.
- 3.9 The West London boroughs and OPDC are seeking to submit the updated WLWP to the Secretary of State 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. It should be noted that the suite of Regulations to enact the new system came into effect on 25th March 2026 (including The Town and Country Planning (Local Planning) (England) Regulations 2026). Guidance in relation to the process is being progressively released by the Government.
- 3.10 This report outlines:
- (a) The scope and content of the emerging Regulation 19 document;
 - (b) Progress made on the document to date;
 - (c) The consultation undertaken on the Regulation 18 version of the draft updated WLWP, the responses received and outcomes of the process; and
 - (c) The next steps in the plan making process, including the expected publication arrangements and the submission of the Proposed Submission version of the West London Waste Plan to the Secretary of State for independent examination.

The adopted West London Waste Plan

- 3.11 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 categorises waste sites across West London and identifies site allocations to meet the London Plan (2011) waste apportionments for the management of waste predicted to arise from households, business and industry up to 2031.

The emerging West London Waste Plan

- 3.12 The Regulation 19 version of the WLWP follows a similar format to the current adopted plan. Key elements include an assessment of 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.

Vision and Objectives of the emerging West London Waste Plan

- 3.13 The Regulation 19 version of the 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.

Policies in the Regulation 19 WLWP

- 3.14 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 granted planning permission.
- Policy WLWP 6 - Circular Economy & Resource Efficiency: Policy setting out the requirements for proposed development to fulfil certain sustainability criteria.
- Policy WLWP 7 - Provision of Wastewater Treatment Infrastructure: Policy providing for new wastewater treatment capacity to be developed and existing capacity to be enhanced where needed.

Safeguarded Sites

- 3.15 To be in general conformity with the London Plan, the WLWP is required to identify sufficient waste management capacity to manage the projected construction and demolition (C&D) waste arisings and the total London Plan

household, industrial and commercial (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.

3.16 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 3 of the WLWP.

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

3.17 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 3 of the WLWP.

Site reference and location	Operator	Types of waste processed*
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

- 3.18 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.
- 3.19 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

Key benefits for Brent residents

- 3.20 Having a Plan for waste land use and development helps ensure that people's waste is managed in the most appropriate areas locally. It helps ensure that it happens in a way that has the least impact on people's living conditions or interference with economic activity (for example through the processing of waste itself or the activity generated around it, such as vehicle movements).
- 3.21 The older a Plan is, the less weight it holds, opening the borough up to a higher chance of development in places that people do not want.

- 3.22 Safeguarding existing waste sites will help ensure that sufficient waste management capacity is retained locally. This will be of benefit to Brent residents, Brent-based businesses and those engaged in construction and similar activities across the borough, as sites in the Plan offer opportunities for waste generated locally to be managed locally, with the environmental benefits and cost benefits that brings.
- 3.23 Safeguarding waste management capacity provided at existing waste sites will also make it less likely that new sites for waste management will need to be found in the future. It can be challenging to successfully accommodate new waste uses within an existing built environment, owing to conflict with adjacent uses, for example.
- 3.24 The Plan process also allows the Council to consider releasing existing sites for other uses where conditions (such as surplus capacity) allow. In this case, the Plan proposes that three existing waste sites in Brent are released from safeguarding to be redeveloped for other uses. This would assist the delivery of the regeneration of the Neasden Goods Yard sites in line with the Neasden Stations Growth Area Masterplan aspirations to deliver other development that the borough needs. A current planning application for these sites proposes the delivery of 1,150 homes, 604 student bedspaces and non-residential floorspace alongside other benefits.

Evidence Base for the emerging WLWP

- 3.25 BPP Consulting has prepared a Waste Capacity Assessment Report, which assesses the management capacity of existing waste sites across the plan area. This determines if sufficient qualifying capacity is available in west London for the waste apportionments set out in the current London Plan 2021 to be met. A survey of the waste operators that run the principal waste sites across west London was undertaken to test the findings of this work.
- 3.26 The Capacity Assessment Report forms a key part of the evidence base for the Regulation 19 version of the WLWP and has been updated in the light of comments received at the Regulation 18 stage. The assessment of safeguarded sites continues to show a surplus of waste management capacity for both HIC and C&D waste. This means that the amount of waste that can be managed by the sites identified in the plan exceeds the waste apportionments set out in the current London Plan. There is, however, a possibility that the waste apportionments could increase as part of the London Plan Review.
- 3.27 A Strategic Flood Risk Assessment (SFRA) relating to the sites has also been prepared as part of the evidence base by Metis Consultants.

Integrated Impact Assessment

- 3.28 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 Regulation 18 draft WLWP. The IIA appraises the likely environmental, social, economic, health and equalities effects of the vision, objectives and policies. An updated IIA Report will be published as part of the consultation on the Regulation 19 version of the WLWP. The HRA specifically focuses on the potential effects the policies of the new WLWP may have on certain designated nature conservation sites, and is contained in a separate HRA report, which will also be published for consultation.

- 3.29 The key findings of the IIA are that overall, the vision, strategic objectives and policies in the Regulation 19 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. A number of mixed minor positive and negative effects were identified for the environmental objectives because of the potential negative impacts associated with waste-related development, depending on when and where development comes forward. However, policies within the emerging WLWP and other parts of the development plan provide criteria to minimise the adverse effects of such development should it come forward. No significant negative effects were identified for the Regulation 19 WLWP.
- 3.30 The Habitat Regulations Assessment Screening highlighted the potential for some likely significant effects on Richmond Park SAC (Special Area of Conservation); South West London Waterbodies SPA (Special Protection Area)/Ramsar; Wimbledon Common SAC; Windsor Forest & Great Park SAC; Burnham Beeches SAC and Lee Valley SPA/Ramsar site. It is noted that some environmental impacts could arise from development proposals coming forward in unspecified locations, rather than within the safeguarded existing sites. However, the Appropriate Assessment process concluded that the environmental safeguards within the WLWP draft policies, along with environmental permitting requirements, are sufficient to avoid adverse effects on the integrity of these designated nature conservation sites. The Habitat Regulations Assessment is available as a background paper to this report.

Consultation on the Regulation 18 Draft West London Waste Plan

- 3.31 The Regulation 18 version of the Draft Updated West London Waste Plan was issued for consultation across all participating boroughs on 11th December 2025. A 'call for sites' exercise inviting potential additional sites for inclusion in the Plan formed part of this process. The consultation ran for 8 weeks until 5th February 2026. The process was undertaken in accordance with the relevant statutory requirements, including the provisions of Brent's Statement of Community Involvement (SCI).
- 3.32 The consultation portal was hosted on Ealing Council's website but also highlighted on the web pages of the participating authorities. Hard copies of the consultation documents were made available for inspection at main offices and libraries across West London. An in person drop-in information event was held

in each of the participating boroughs over the course of the consultation period. Two online drop-in information events were also held.

Responses to the Regulation 18 Consultation

- 3.33 Representations on the Regulation 18 version of the WLWP were received from 77 separate individuals and organisations. A summary table of the responses received and a comprehensive Consultation Report have been prepared. The key issues raised are summarised in the following paragraphs:
- 3.34 *Waste Capacity Calculations:* Some concerns were raised regarding the Identified capacity of safeguarded sites (the calculated amount of waste that sites are assessed to be able to manage in any year within the plan period). For example, the GLA noted that the capacity of some sites is based on the maximum throughput of waste at the site over the last five years (which is the GLA's default approach), while the capacity of other sites is calculated based on other data. Some site owners did not agree with the capacity attributed to their sites.
- 3.35 *Release of Safeguarded Sites:* The GLA raised concerns regarding the proposed release of six identified sites without expressly requiring the provision of alternative waste management provision elsewhere to compensate for the loss (compensatory capacity).
- 3.36 *Policy WLWP 1: Safeguarding and Optimising the Waste Network:* The GLA noted that as drafted, part G of policy WLWP 1 supported the release of safeguarded waste sites for other land uses through the development management process, without securing compensatory capacity. They considered that this part of the policy conflicted with policy SI9 of the London Plan, which requires compensatory capacity to be provided if sites are redeveloped for non-waste purposes.
- 3.37 *Discrepancies in the definition of waste sites:* The GLA and others noted discrepancies between the definition of a waste site in the draft Regulation 18 WLWP and that contained in the current London Plan.
- 3.38 *Need for additional policy on wastewater:* Thames Water Utilities identified a need for an additional policy in the plan related to wastewater treatment infrastructure.
- 3.39 *Response to the Call for Sites exercise:* Three sites were submitted in response to the 'call for sites' process undertaken as part of the Regulation 18 consultation. Two of the proposed sites are located in Hillingdon and one is located in Hounslow. One of the Hillingdon sites comprises an extension to an existing safeguarded facility. The other site at Broadwater Lake proposes a new waste management facility. However, this site has since been granted planning consent for a leisure-based use. The remaining site in Hounslow is an existing waste site that has, through the Plan-making process, been identified as operating unlawfully, and the submission is to support an application to

regularise the operation. Details of the submitted sites are contained in the Consultation Statement.

- 3.40 *Site Specific representations:* A number of comments were received in relation to the proposed safeguarded sites identified in the draft WLWP. In general terms, these comments were made on the principle of safeguarding a particular site (either supporting or objecting to the proposed safeguarding) or the proposed waste management capacity figures for the site (noting that the figures should be reduced or could be increased). Comments made in relation to specific safeguarded sites can be found in the Consultation Statement.
- 3.41 *Heathrow Airport Ltd representations:* Heathrow Airport Ltd noted that several safeguarded sites are located in the proposed airport expansion area, two of which may be at risk should the proposed expansion proceed. In addition, the Plan should recognise that airport expansion will generate a significant amount of construction and demolition waste and may place a significant burden on existing waste management facilities across West London.
- 3.42 *Engagement with other London Boroughs:* Comments were received from other Boroughs outside of the west London area that are not part of a waste planning group and are requesting to make use of the surplus of waste management capacity that is identified in the plan to meet their unmet needs.
- 3.43 Westminster City Council stated that it has been unable to identify sites within its boundary and would welcome the opportunity to join the West London waste planning partnership to plan positively for its unmet need.
- 3.44 Tower Hamlets Council is a Unitary Waste Plan Making Authority (i.e. not part of a Waste Plan-making group) and has identified a shortfall in meeting its waste management needs. Noting the surplus capacity identified in the plan, Tower Hamlets is seeking to transfer 192,370 tonnes per annum of HIC waste and 56,935 tonnes per annum of C, D and E waste capacity to west London to meet its own waste needs.
- 3.45 Lambeth Council noted that a slight shortage of waste management capacity had been identified over the period of its Local Plan and would like to explore the potential to accommodate unmet need in West London. Lambeth noted that this matter could be progressed through a Statement of Common Ground.

Changes to the Regulation 18 Version

- 3.46 All responses made at the Regulation 18 stage have been carefully considered and a number of changes are proposed as a direct result of the comments received. The changes are detailed in the Schedule of Changes report and a tracked changes version of the Regulation 18 Draft Updated West London Waste Plan is available as a background document. Some of the key changes that are proposed to the Regulation 18 version of the WLWP are summarised below:

Executive Summary

- Additional text to provide a factual update on the London Plan review and the current position regarding the proposed expansion of Heathrow Airport

Chapter 2: Introduction and Background

- Text updated to explain the process of preparing the Regulation 19 version of the WLWP.
- New 'How to Comment' text added to note that comments are invited on the overall soundness and legal compliance of the plan at the Regulation 19 stage.

Chapter 3: The Plan Context

- Reference added to confirm the release of safeguarded waste sites for other land uses within the boundaries of the Old Oak and Park Royal Development Corporation.

Chapter 4: Waste Management in West London

- Contextual information in this chapter has been moved from the main body of the Plan to an Appendix.

Chapter 5: The Policy Context

- Chapter updated to note that Harrow's Local Plan 2021-2041 has now been adopted.
- Additional text noting that the proposed expansion of Heathrow Airport would place pressure on certain existing waste sites.

Chapter 6: Vision and Objectives

- No substantive changes are proposed to this chapter.

Chapter 7: Future Requirements for Waste Management Capacity

- Figures for the total waste management capacity for processing Household, Industrial and Commercial (HIC) waste have been updated in response to comments relating to the management capacity of specific safeguarded sites. The management capacity for HIC waste has decreased slightly from the Regulation 18 version of the plan.
- Updated text noting that continued engagement will take place regarding the potential to accommodate unmet needs from other London Boroughs.

Chapter 8: Future Waste Management Capacity in West London

- No substantive changes are proposed to this chapter

Chapter 9: Proposed Policies

- Minor textual changes to the policies.
- Deletion of Part G in Policy WLWP 1 in response to comments received from the GLA about conflict with policy SI9 of the London Plan.
- Additional supporting text to explain how the key provisions of WLWP 1 should be interpreted. In particular, Part F lists a number of criteria that will be given weight when assessing proposals to release safeguarded sites, including 'wider market conditions'. Additional text to explain this term has been added to the supporting text.
- Minor updates added to WLWP 2 to explain how the policy criteria should be applied.
- No substantive changes have been made to WLWP 3.
- In relation to WLWP 4, specific reference is added to note that measures should be incorporated into the design of facilities to minimise the risk of bird strike in response to comments received from the Ministry of Defence. The supporting text has also been amended to include reference to securing biodiversity net gain in accordance with statutory requirements.
- The supporting text to WLWP 5 has also been amended to include specific reference to reducing the risk of bird strike where waste is disposed of to land.
- No substantive changes are proposed to WLWP 6.
- Addition of policy WLWP 7: Provision of Wastewater Treatment Infrastructure in response to comments received from Thames Water Utilities.

Chapter 10: Glossary

- No substantive changes are proposed to this chapter.

Chapter 11: Appendix 1 - Monitoring Framework:

- No substantial changes are proposed.

Chapter 11: Appendix 2 - List of Safeguarded Waste Sites

- Updates to the capacity figures for some sites.
- One site in Hillingdon (HI14 in the WLWP) is proposed to be removed from the Plan.

Chapter 11: Appendix 3 - Maps of Safeguarded Sites

- Site boundaries have been amended in some instances in response to comments received.

Chapter 11: Appendix 4 - Replacement Policies in the West London Waste Plan:

- No substantive changes are proposed.

Assessment of Submissions Received Through the Call for Sites Process

- 3.47 The submissions received in response to the Call for Sites exercise have been subject to a thorough assessment to determine their suitability for inclusion in the Regulation 19 version of the WLWP. This process assessed the sites against criteria related to their characteristics (size and planning status), site suitability (site configuration, existing uses, proximity to sensitive receptors and transport considerations) and other planning considerations, such as the planning designations that related to the sites. A score was assigned to each site against these criteria to determine their suitability. In addition, the sites were also assessed through the updated Integrated Impact Assessment as 'reasonable alternative' site options considered during preparation of the plan.
- 3.48 Taken together, the assessment process and IIA findings do not support the inclusion of any of the three sites submitted through the Call for Sites process in the Regulation 19 version of the WLWP. Further information on the findings of the assessment process is available in the background documents attached to this report.

Publication of the Regulation 19 Proposed Submission Version of the WLWP

- 3.49 The Regulation 19 Proposed Submission version of the West London Waste Plan is attached to this report at Appendix A and is scheduled to be published for comment over an eight-week period starting in August 2026, once it has the necessary authority for consultation by all of the participating authorities. This version of the plan is the one which (following the relevant independent examination process) the authorities want to be adopted. Regulation 19 will be the final opportunity for stakeholders to submit comments on the Plan prior to its examination. At Regulation 19 stage, stakeholders will be invited to comment only on whether the Plan is legally compliant and whether it meets the tests of soundness as set out in the National Planning Policy Framework. They will also be asked whether they wish to appear at an Examination hearing session.

Methods of Engagement at the Regulation 19 Stage

- 3.50 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.

Duty to Cooperate

- 3.51 The Government has confirmed that the provisions of the 'duty to cooperate' process have been removed from the plan-making system. However, the requirement for Councils to engage in relation to strategic matters will continue and will be a key consideration for Inspectors when assessing the soundness of plans submitted for examination. Discussions with key stakeholders will continue throughout the forthcoming stages of preparing the WLWP, including with the London authorities who are seeking to rely on the surplus waste management capacity identified in the Regulation 19 WLWP.

Next Stages in the Plan Making Process

- 3.52 Subject to the approval of the recommendations outlined above, the Regulation 19 version of the WLWP will be published for comment over an eight-week period commencing in August 2026. Views will be sought on the overall soundness of the plan, as assessed against the tests of soundness set out in the NPPF, and its legal compliance.
- 3.53 During the remaining plan-making process, other activities will include:
- Maintaining dialogue with the GLA to ensure the Regulation 19 version of the WLWP is in general conformity with the current and emerging London Plan.
 - Continuing with engagement activities, including preparing and agreeing statements of common ground with neighbouring authorities and relevant organisations as needed.
 - Engaging in governance activities, including briefings with Members from each of the participating west London boroughs.
- 3.54 Following the Regulation 19 publication period, it is intended that a report will be taken to Full Council in November 2026, to present the documents proposed to be submitted to the Secretary of State for examination and to seek authorisation to submit these documents to the Secretary of State for formal examination. These documents will include the Plan at Appendix A of this

report, the representations received during the Regulation 19 consultation process and any suggested amendments to the Plan in response to these. The following documents will be submitted with the Plan:

- The Integrated Impact Assessment (IIA);
- A submission policies map;
- A statement setting out: who was invited to make representations on the plan at Regulation 18 consultation stage, how those representations were invited, a summary of the main issues raised, and how the representations were taken into account; and the number of representations made under Regulation 20 (in response to consultation at Regulation 19 stage) and a summary of the main issues raised;
- Copies of all representations made under Regulation 20 (in response to consultation at Regulation 19 stage); and
- Such supporting documents which the LPA considers are relevant to the preparation of the plan (these will include the evidence base).

3.55 As part of the examination process, which will include a series of public hearing sessions, the participating authorities can ask the inspector to recommend main modifications to the plan where necessary to make the plan sound and legally compliant. Any main modifications are then subject to a further period of public consultation (timescale determined by the Inspector) alongside an updated IIA. The Inspector will then consider any representations made on the main modifications as part of the examination.

3.56 At the end of the examination the Inspector will produce a report setting out recommendation(s) and the reasons for them. The participating authorities will be required to publish this report. There are three possible outcomes to the examination:

- The Inspector finds that the WLWP is sound and legally compliant as submitted: in these circumstances the Inspector must recommend that the plan is adopted;
- The Inspector finds that the plan is unsound and/or legally noncompliant as submitted, but that it is possible to make it sound and legally compliant by making 'main modifications' to it. In these circumstances the Inspector must recommend the necessary modifications, if requested to do so. The modifications must relate directly to the reasons why the Inspector has found the plan unsound or legally non-compliant; or
- The Inspector finds the plan unsound and/or legally non compliant as submitted, and that it is not possible to make it sound and legally compliant by making modifications to it.

- 3.57 Following the receipt of the Inspector's Report and subject to its conclusions, the participating authorities will then be in a position to adopt the new West London Waste Plan. For Brent, the decision to adopt will be one taken by Full Council.
- 3.58 Whilst 'main' modifications may have to be recommended by the Inspector for the Plan to be found 'sound', these must be proposed to the Inspector by the participating authorities. Any such modifications cannot be so substantial that they fundamentally alter the Plan. This should mean that the Council will not be put into a position where it has a fundamental issue with the final version of the Plan that the Inspector recommends it should adopt. If officers perceive this is a risk, the proposed main modifications the authorities are proposing to the Inspector will be subject to prior consideration by Council.

Options

- 3.59 There are two options open to the Cabinet:
- a) Proceed with the recommendations that the Plan is found to be sound, subject to the conclusion of the Regulation 19 consultation, and agree to recommend the Plan as such to Full Council in November in order for Full Council to authorise the submission of the Plan to the Secretary of State for examination.
 - b) Do not proceed with the recommendations

Option a)

- 3.60 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.
- 3.61 The current WLWP was adopted over 11 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, including addressing the HIC waste apportionment targets and the management targets for C&D waste set out in the adopted and emerging London Plans.
- 3.62 The Council's Local Development Scheme (LDS) provides a timetable for the review of the documents that form part of the development plan, which includes the WLWP. The current LDS anticipates Publication of the emerging WLWP in Summer 2026 and Submission in December 2026.
- 3.63 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.

- 3.64 Specifically in order to allow time for the Plan to proceed through the Regulation 19 consultation stage and for the results of this consultation and suggested responses to be agreed between the participating local authorities and reported to Full Council in November 2026, the consultation would need to commence in August 2026.

Option b)

- 3.65 Option b) would involve not approving the draft updated WLWP for publication. This decision would delay the adoption of the new 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 production process. This would also prevent the other participant local authorities from progressing towards adoption of the Plan, because the Plan is based on a joint strategy with waste management requirements pooled and capacities shared across the West London area.
- 3.66 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 Briefings have been offered to Members of all the political parties within the Council. To date, briefings have been provided to Conservative Party and Liberal Democrat Members and to the new Cabinet Member for Regeneration, Planning and Property. The Members who previously held the positions of Cabinet Member for Regeneration, Planning and Property and Cabinet Member for Climate Action and Community Power were briefed at earlier stages. The Member who previously held the position of Cabinet Member for Public Realm and Enforcement also attended a briefing hosted by the West London Alliance and delivered by the consultants, BPP. The Members who currently hold these positions have all been offered a briefing by the Planning team. The proposed Regulation 19 consultation arrangements are outlined in paragraph 3.42 of this report. Appropriate notifications consistent with the Council's Statement of Community Involvement will be carried out for this and subsequent stages of the plan preparation process.

5.0 Financial Considerations

- 5.1 The preparation of the 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 reserves budget.
- 5.3 The cost of not proceeding with the recommendations for the WLWP (option b)) would likely result in costs greater than the £29,500 per year for Brent.

6.0 Legal Considerations

- 6.1 This Plan is being prepared under the 'legacy' plan-making system, in accordance with 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"), as saved by transitional provisions.
- 6.2 Representations received during the Regulation 18 stage have been taken into account in helping to shape the Regulation 19 submission draft. The local planning authority will follow the statutory procedures set out in Regulation 19 of the 2012 Regulations for the upcoming Regulation 19 stage consultation.
- 6.3 Following the Regulation 19 publication (consultation) period, approval will be sought from Full Council to submit the plan to the Secretary of State for examination under section 20 of the Planning and Compulsory Purchase Act 2004.

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 also internally recognises care experience and socio-economic status as protected characteristics. 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 (attached as a background paper to this report), which includes an Equalities Impact Assessment (EqIA). The EqIA and its criteria are embedded within the IIA objectives used to appraise the emerging WLWP, rather than being undertaken as a separate assessment.

- 7.3 With regards to equality, the IIA notes that the vision, strategic objectives and policies for the emerging WLWP are likely to have a negligible effect on protected characteristics given their strategic nature, their focus on waste management issues, and as the Plan does not allocate land for development. However, the emerging WLWP does indirectly give consideration to the potential effects of waste development on specific groups, where there may be increased vulnerability to the effects of waste management facilities and processes, including air pollution, climate change, employment opportunities and social deprivation.
- 7.4 Consultation on the emerging WLWP and its IIA at Regulation 18 stage gave stakeholders/residents the opportunity to comment on the documents and any likely adverse impacts of policies and proposals on specific groups. The publication of the Regulation 19 version of the WLWP and its IIA will allow stakeholder/resident views on the documents in relation to any likely adverse impacts of policies and proposals on specific groups to be identified and carefully considered prior to the submission of the Plan and its IIA to the Secretary of State for examination. The broad purpose of this duty is to integrate considerations of equality into day-to-day business and keep them under review in decision making, the design of policies and the delivery of services.

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, with broad alignment to the five key themes within Brent's Climate and Ecological Emergency Strategy. It has been constructed with due consideration to environmental sustainability via a comprehensive Sustainability Appraisal, Strategic Environmental Assessment and Habitats Regulations Assessment which accompany the report.
- 8.2 This vision is reflected in the WLWP's five Strategic Objectives and in the seven policies which would be used to determine applications for planning consent for waste related development in west London. Each of the five objectives have factored in the importance of environmental sustainability in some form.
- 8.3 The Vision reflects this via a focus 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 also 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 improving energy efficiency, encouraging the increased use of low-carbon transport, with greater use of rail river freight supported by electric and low-emissions vehicles and promotes waste infrastructure that is resilient to extreme weather effects of climate change.
- 8.4 It also considers the ecological emergency, and the potential impact on biodiversity and habitats. The plan states that as a general principle, proposed development should have no significant adverse effects on local biodiversity and opportunities to enhance biodiversity and green infrastructure on and

around the site should be maximised to improve visual amenity and provide ecological benefit. Biodiversity net gain should also be secured in line with the statutory framework and any local policy requirements set out in the development plans of each LPA.

9.0 Communication Considerations

- 9.1 There will be an appropriate level of the Communications team's support to raise awareness, e.g. potentially 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 through a joint consultation portal with the participating West London authorities. Those on the Council's planning policy database will be notified of the consultation.

Related document(s) for reference:

November 2025 [Decision - Draft West London Waste Plan Regulation 18 Consultation](#)

Report sign off:

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