Brent	**Full Council** 16 November 2026
	Report from the Corporate Director Neighbourhoods and Regeneration
	Lead Member - Cabinet Member Regeneration and Planning (Councillor Matt Kelcher)

West London Waste Plan Submission to the Secretary of State for examination

Wards Affected:	All
Key or Non-Key Decision:	Council
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:	Appendix A: Regulation 19 Proposed Submission 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 Council agenda** The following additional appendices 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 to the SFRA report) Appendix H: Integrated Impact Assessment Non-technical summary Appendix I: Construction, demolition and excavation waste arising in West London to 2041 Appendix J: Hazardous waste arising in West London to 2041

	Appendix K: Strategically Significant Waste Flows Appendix L: Climate Change Topic Paper Appendix M: Circular Economy Topic Paper Appendix N: Waste management Topic Paper Appendix O: Assessment of existing waste sites for release Appendix P: Assessment of existing waste capacity in West London 2025 Appendix Q: Regulation 22 Proposed Submission West London Waste Plan Consultation Statement Appendix R: Regulation 22 Proposed Submission West London Waste Plan Consultation Statement Appendix 6 (Representations received) Appendix S: Strategic Cooperation Statement
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 (WLWP) will form a part of the Brent Local Development Plan and will be used for determining planning applications for waste related development within Brent and across West London. It will replace the current West London Waste Plan, adopted in 2015, which is now outdated and in need of replacement.

1.2. The WLWP 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).

1.3. The WLWP identifies existing sites that accommodate waste facilities in West London and provides planning policies to guide decisions on planning applications for additional capacity, with the overall aim of reducing waste, increasing recycling and ensuring the proper management of waste in line with the waste hierarchy (under Article 4 EU Waste Framework Directive 2008/98/EC), as close to source as possible. It is intended to help ensure that waste is managed in the most appropriate locations, protecting residents' living conditions and providing environmental and economic benefits. The WLWP is

concerned with planning policies and planning decisions in relation to waste related development, it does not cover operational matters such as how household waste collections are organised in the borough.

1.4. Full Council approval is sought to submit the Proposed Submission version of the West London Waste Plan, that has now completed public consultation under Regulation 19, to the Secretary of State for independent public examination, under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations (2012).

2.0 Recommendations

Full Council is requested:

2.1 To resolve that it is satisfied that the Proposed Submission version of the West London Waste Plan is sound (in accordance with paragraph 36 of the National Planning Policy Framework 2024) and legally compliant and to authorise submission of the Plan and associated documents to the Secretary of State for Housing, Communities and Local Government, for independent public examination.

2.2 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:

(a) make any inconsequential changes, such as typographical and accuracy amendments and factual updates, to the associated supporting and evidence base documents which will be submitted with the Plan (in conjunction with the other participating authorities) to facilitate submission of the Plan to the Secretary of State.

(b) make a formal request of the Planning Inspector at an appropriate point during the examination of the West London Waste Plan to recommend modifications to the Plan to make it sound and legally compliant in accordance with section 20 (7c) of the Planning and Compulsory Purchase Act if that proves to be necessary; and

(c) exercise all examination procedural matters as prescribed by the Planning and Compulsory Purchase Act 2004 and associated Regulations, including updates to submission documents, agreeing statements of common ground and agreeing and consulting on further modifications, that may be required to make the Plan sound.

2.3 To note that after completion of the examination process and a determination by the appointed inspector that the Plan can proceed to adoption, the West London Waste Plan will be presented to Full Council to seek its approval for the formal adoption of the 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 strategy and policy portfolio and the updated Plan will replace the current version, which was adopted in 2015. It is anticipated that the policies of the new WLWP will contribute to the achievement of the five strategic priorities set out in the Borough Plan. In particular Policy WLWP 1 seeks to retain and optimise essential waste infrastructure and Policy WLWP 2 guides the provision of additional waste management capacity 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 on or close to existing 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 A new 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 combined Borough level Household, Industrial, and Commercial (HIC) waste apportionments and management targets for construction and demolition waste set out in the 2021 version of the London Plan to be met through to 2041.

3.6 The first stage of public consultation, the 'Regulation 18' consultation, 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 Regulation 18 consultation, the responses received and amendments made to

the Plan following the consultation, are available in the Cabinet report of 27th July 2026**.**

3.7 On 27th July 2026, Cabinet approval was obtained to undertake the second stage of public consultation, the 'Regulation 19' stage, for an eight-week period, commencing in August 2026: West London Waste Plan Regulation 19 Consultation decision. The Regulation 19 Proposed Submission version of the WLWP was published 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. Further details of the Regulation 19 consultation are set out below.

3.8 The Proposed Submission version of the Plan (the same version of the Plan that was published for comment at Regulation 19 stage) is appended to this report. The documents appended to this report also include a Consultation Statement setting out the representations received during the Regulation 19 consultation process and the authorities' responses to these, which identify matters and potential amendments for the Inspector's consideration during the independent examination of the Plan.

3.9 The government set a deadline of 31st December 2026 for the submission of the Plan to the Secretary of State for independent examination, following which it will be formally adopted (subject to successful examination) by each of the West London planning authorities party to it. On 23rd October 2026 the government issued updated information about deadlines, including a possible time extension, and clarity on the implications of this is currently being sought. Meeting the government deadline is necessary to allow the Plan to be prepared and examined under the current plan-making system, avoid abortive work and prevent significant delays in having a new plan in place associated with the transition to the new plan-making system.

3.10 This report outlines:

(a) The scope and content of the new West London Waste Plan;

(b) An overview of the Regulation 19 consultation and the representations received; and

(c) The next steps in the plan making process, including the submission of the Proposed Submission version of the West London Waste Plan to the Secretary of State for independent examination.

The new West London Waste Plan

3.11 Key elements of the WLWP 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 capacity to manage expected and apportioned waste arisings and substantially updated policies reflecting national policy against which planning applications for waste related development will be determined.

Vision and Objectives of the emerging West London Waste Plan

3.12 The WLWP contains a high-level vision which sets out what the WLWP is seeking west London 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 WLWP

3.13 The policies included in the 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 specific requirements/standards that additional waste 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 and placement of inert waste 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 additional wastewater treatment capacity to be developed and existing capacity to be enhanced where needed.

Safeguarded Sites

3.14 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 apportioned to each of the West London Boroughs. Existing waste sites across West London need to be safeguarded to ensure that sufficient waste management capacity is retained to meet forecast needs.

3.15 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 new WLWP. These are listed below and 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

3.16 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 (HIC)
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

3.17 The WLWP also identifies six existing waste sites across the WLWP area for release from safeguarding, as each falls within areas identified for redevelopment in local planning authority Local Plans for non-waste uses.

These sites are to be released on the basis that their continued safeguarding and use for waste management conflict with wider planning and regeneration objectives. If the waste management capacity offered by these sites were to be lost, sufficient surplus capacity for the management of HIC and C&D waste would still remain.

3.18 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 existing waste sites are all within the 'Neasden Goods Yard' site 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 (HIC 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

3.19 Having a Plan for waste land use and development helps ensure that waste produced in west London is managed by the most appropriate means at facilities in appropriate locations. 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).

3.20 The older a Plan is, the less weight it holds in decision making, opening the borough up to a greater chance of development being granted permission on appeal in sensitive or less suitable locations.

3.21 Safeguarding most 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. As noted above, the Plan making process also allows the Council to consider releasing existing sites for other uses where conditions justify it.

The Regulation 19 final draft plan consultation

3.22 The Regulation 19 consultation involved the following:

- A website-based portal was used to host a questionnaire, provide information about the consultation and opportunities for involvement and to host consultation materials.

- Information was published on Borough and OPDC websites and documents were made available for inspection at main Council Offices and libraries.

- Notification of the process was carried out by each of the participating authorities in line with an agreed Consultation Protocol (based on Statements of Community Involvement), which generally involved emailing stakeholders in their respective area using details held on consultation databases, in addition to other publicity.

3.23 For Brent specifically, emails were sent to those on the planning policy consultation database and a Brent 'Have Your Say' page was created to provide Brent-specific details about the WLWP consultation and a link to the Ealing-hosted portal to complete the survey. In addition, a press notice was published in the Brent and Kilburn Times (jointly with OPDC), a drop-in session was held in the Civic Centre atrium on 20th August and internal notifications were made including articles in two Members' Information Bulletins and a Viva Engage post.

3.24 The 'Regulation 19' consultation is a statutory consultation stage that has specific questions respondents are able to respond to. The purpose of a Regulation 19 consultation is specifically to seek views on whether the Proposed submission WLWP is "sound" and "legally compliant" as defined by the National Planning Policy Framework and planning legislation. It also gives respondents the opportunity to confirm whether they wish to appear at an examination hearing session.

3.25 62 responses were received as part of the Regulation 19 consultation. 20 were from individuals while the other 42 were from bodies including local authorities, non-governmental organisations, infrastructure operators, businesses and landowners. A table has been prepared which sets out representations received during the Regulation 19 consultation process and the authorities' responses to these, which identify key matters and potential amendments for the Inspector's consideration during the independent examination of the Plan. This is available within the Regulation 22 Consultation Statement at Appendix Q to this report.

Summary of other key issues raised within the representations

3.26 **General conformity with the London Plan:** Development Plans in London, including Waste Plans, are required to be in general conformity with the London Plan. At Regulation 19 stage, local authorities must seek the Mayor's formal opinion on whether the plan is in general conformity with the London Plan. The GLA have provided formal comments on the WLWP, its approach, definitions and policies.

3.27 The GLA has identified one area in which it considers the Plan, as currently drafted, is not in general conformity with the London Plan 2021. It states that this is due to the proposed release of six safeguarded waste sites without providing compensatory capacity combined with the failure to offer surplus waste handling capacity to those boroughs in London with a shortfall in the ability to meet their waste needs prior to the release of the identified sites.

3.28 The participating authorities consider that the WLWP is in general conformity with the London Plan. They are engaged in dialogue with Westminster City Council and Tower Hamlets Council about potentially sharing surplus capacity to meet a demonstrated unmet need. The GLA have expressed a willingness to continue to offer support and to work with the participating authorities to provide guidance and to ensure that the WLWP aligns with London Plan 2021 as well as delivering the authorities' objectives. The participating authorities will continue to engage in dialogue with the GLA in an attempt to reach agreement on key matters and achieve a confirmation of general conformity via a Statement of Common Ground.

3.29 **Sharing of surplus capacity:** Requests were made by two other London planning authorities (Westminster City Council and LB Tower Hamlets) to share West London's surplus capacity so that their unmet waste capacity needs are provided for. It should be noted that the participating authorities are engaged in ongoing dialogue with these authorities on the potential sharing of surplus capacity.

3.30 **Heathrow airport expansion:** Two representations were received in relation to the proposed expansion of Heathrow airport. One of these explicitly requested that two sites in Hillingdon, Site HI06 (Unit 1 Wallingford Road Recycling Facility) and Site HI09 (Holloway Lane Materials Recycling Facility), be released from safeguarding to support the Heathrow airport expansion plans.

3.31 **Site specific representations**: A number of comments were received in relation to specific proposed safeguarded sites identified in the WLWP. Many of these comments related to the principle of safeguarding a particular site while others related to fine tuning the safeguarding by adjusting boundaries, capacities and operator details. Representations were received which, overall, requested that seven additional sites, or parts of sites (in addition to the two identified in relation to Heathrow airport expansion and the six sites already earmarked for release) be released from safeguarding. These related to part of Site HI18 in Hillingdon (High View Farm), Site E19 in Ealing (Unit 42a Sheraton Business Park), two sites in Richmond – Site R02 (Kew Gardens) and Site R04 (Arlington Works), two sites in the part of Brent where Brent Council is the local planning authority – Site B12 (Unit 2, Hannah Close) and Site B16 (Land off Great Central Way, Neasden) and one site in the OPDC part of Brent – Site B02 (100 Twyford Abbey Road).

3.32 **Discrepancies in the definition of waste sites:** The GLA and others noted discrepancies between the definition of a waste site to be safeguarded set out in the WLWP and that contained in the current London Plan.

3.33 **Evidence base and waste capacity methodology:** Some concerns were raised regarding the identified capacity of safeguarded sites, the method used to assess site capacity and how waste flows were accounted for.

3.34 **Need for stronger policy protection / more emphasis on certain matters:** These include for heritage assets, registered parks and gardens and archaeology, natural environment, biodiversity and green infrastructure, amenity, health, transport and environmental justice, climate change, energy from waste, carbon, circular economy, waste reduction and plastics and dealing with hazardous waste.

3.35 **Other matters:** Representations were also raised about other matters including the Integrated Impact Assessment, the monitoring framework, infrastructure and asset protection, the deposit of waste on land and wastewater.

3.36 As noted above, the authorities have provided responses to these representations within the Consultation Statement, which identify key matters and potential amendments for the Inspector's consideration during the independent examination of the Plan. The participating authorities do not consider that any of the representations raised matters or identified grounds which would require amendments to be made to the Plan that would materially affect its policy content. The potential amendments identified relate to more minor matters such an improving the clarity and comprehensiveness of the Plan and incorporating factual updates.

3.37 It is important to note that all the representations received will be submitted in full to the appointed Planning Inspector for their consideration. A number of parties have requested to speak during hearing sessions. The Inspector can invite them to attend relevant hearing sessions to express their views in person.

3.38 The Inspector will consider the WLWP, the evidence which underpins it and the representations received at the Regulation 19 consultation. At an appropriate point within the examination process the participating authorities can, if necessary, formally request that the Planning Inspector recommends modifications to the Plan to make it sound and legally compliant if the inspector considers that it is not already.

Engagement and cooperation on strategic matters

3.39 The Government has confirmed that the provisions of the ‘duty to cooperate’ have been removed from the plan-making system. However, the requirement for Councils to engage in relation to strategic matters continues and this is expected to be a key consideration for Inspectors when assessing the soundness of plans submitted for examination.

3.40 Discussions with key stakeholders will continue throughout the forthcoming stages of preparing for submission and examination of the WLWP, including with the London authorities seeking to rely on the surplus waste management capacity identified in the WLWP. ‘Statements of Common Ground’ (SoCG) can

be produced to document cross-boundary matters being addressed, and the progress in cooperating to address these. Once signed, these SoCG will be submitted to the Secretary of State, to demonstrate cooperation. At present, it is anticipated that Statements of Common Ground to be progressed will include the below:

Relevant body	**Summary of issues likely to be covered in the Statement of Common Ground**
Greater London Authority (Mayor of London)	Compensatory capacity for sites proposed for release. Sharing surplus capacity with other boroughs (notably Westminster City Council and LB Tower Hamlets) and how any agreements should be reflected in the Plan. Alignment of 'waste site' definition.
London Borough of Tower Hamlets (LBTH)	LBTH request for sharing of surplus waste capacity. Evidence/monitoring of cross-boundary flows.
Westminster City Council (WCC)	WCC request for sharing of surplus waste capacity. Evidence/monitoring of cross-boundary flows.
Oxfordshire County Council (OCC)	Future management of residual waste from West London by landfill in Oxfordshire, given that Sutton Courtenay landfill site is due to close in 2030.

Submission Documents

3.41 The participating authorities intend to submit the Plan and other submission documents to the Secretary of State by 31st December 2026. The documents will include the WLWP itself, the Integrated Impact Assessment (IIA), the Habitats Regulations Assessment (HRA) and various evidence base documents, topic papers and associated documents that support and justify the Plan.

3.42 The IIA which has been prepared and updated alongside the Plan comprises the Sustainability Appraisal incorporating Strategic Environmental Assessment, Health Impact Assessment and Equalities Impact Assessment. The IIA appraises the likely environmental, social, economic, health and equalities effects of the vision, objectives and policies. The HRA specifically focuses on the potential effects the chosen policies of the new WLWP may have on certain designated nature conservation sites.

Next Stages in the Plan Making Process

3.43 During the remaining plan-making process, other activities will include:

- Maintaining dialogue with the GLA to resolve its concerns about the WLWP not being in general conformity with the London Plan.

- Continuing with engagement activities, including preparing and agreeing statements of common ground with other local authorities and relevant organisations as needed.

3.44 As part of the examination process, the participating authorities can invite the Inspector to recommend main modifications to the plan where necessary to make the plan sound and legally compliant. Substantive changes can be made through a 'main modification', which would necessitate further formal public consultation, as part of the examination process (with a timescale determined by the Inspector) alongside an updated IIA. The Inspector would then consider any representations made on the main modifications as part of the examination. To ensure that the partners can continue to prepare to submit all the necessary material for the examination and that the examination process runs in a timely manner, it is recommended that Council delegates authority to the Head of Planning and Development Services (in consultation with the Corporate Director of Neighbourhoods and Regeneration) to carry out what is necessary to ensure that the inspector can conclude the examination.

3.45 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 the WLWP to be 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 is to recommend 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.

3.46 Following the receipt of the Inspector's Report and subject to its conclusions, it is expected that the participating authorities will then be in a position to adopt the new WLWP. For Brent, the decision to adopt will be taken by Full Council.

3.47 Whilst 'main modifications' may have to be recommended by the Inspector for the Plan to be found 'sound', these would 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 concern with the version of the Plan the Inspector recommends it 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

3.48 There are two options open to Full Council:

a) Proceed with the recommendations that the Plan is sound and legally compliant and agree to authorise the submission of the Plan to the Secretary of State for examination, that the inspector be requested to recommend modifications, along with delegation to the Head of Planning to undertake any inconsequential changes to material prior to submission and exercise all examination procedures that may be required to make the Plan sound.

b) Do not proceed with the recommendations.

Option a)

3.49 The WLWP 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.

3.50 The current WLWP was adopted over 11 years ago. It has been reviewed so that it provides an up-to-date set of policies against which planning applications for waste related development can be determined ensuring 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 London Plan.

3.51 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 submission of the Plan in December 2026.

3.52 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)

3.53 Option b) would involve not submitting the WLWP to the Secretary of State for examination. 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 in place 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.

3.54 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 consultation carried out at Regulation 19 stage is outlined in paragraphs 3.22 and 3.23 of this report. This included email mailouts, a notice published in the press, a drop-in session at the Civic Centre and a Viva Engage post. Briefings were provided to Members of all the political parties within the Council prior to the report seeking authority to proceed to Regulation 19 consultation being presented to Cabinet in July 2026. Following on from this, during the Regulation 19 period, an article was published in two Members' Information Bulletins. Appropriate notifications consistent with the Council's Statement of Community Involvement were carried out at Regulation 19 stage and will be carried out for subsequent stages of the plan preparation process.

5.0 Financial Considerations

5.1 The preparation of the WLWP is being led by an officer steering group, 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. The costs associated with submission, including using the services of a Programme Officer, venue hire for public hearings, legal and technical support, and document preparation are expected to be covered by the annual contributions which have already been budgeted for. By the end of the examination process, the total cost to Brent is expected to be around £147,500

5.3 The cost of not proceeding with the recommendations for the WLWP (option b)) would likely result in costs greater than the £147,500 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 were taken into account in shaping the Regulation 19 submission draft. The statutory procedures set out in Regulation 19 of the 2012 Regulations for the Regulation 19 stage consultation were followed.

6.3 Now that the Regulation 19 publication (consultation) period has finished, approval is 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. The representations received in response to the Regulation 19 publication (consultation) period will be amongst the documents submitted to the Secretary of State for consideration by a Planning Inspector during the formal Plan examination process.

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 has been 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 new 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 new 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 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 The publication of the Proposed Submission version of the WLWP and its IIA at Regulation 19 stage allowed stakeholder/resident views on the documents in relation to any likely adverse impacts of policies and proposals on specific groups to be identified and considered prior to the submission of the Plan and its IIA to the Secretary of State for examination. Environmental justice and cumulative-impact issues were raised within one representation and are summarised in the Consultation Statement alongside the authorities' response to these. The authorities' response notes that the IIA (Integrated Impact

Assessment) process tested the Plan to ensure that environmental burdens were minimised. On this basis, no changes to the Plan are considered necessary in relation to these issues. The Inspector will have access to both the summary and the full representation submitted which raised these issues and may wish to explore them further during the examination process. This could potentially result in the Inspector recommending changes to the Plan including its Monitoring Framework.

8.0 Climate Change and Environmental Considerations

8.1 Climate change and environmental considerations are central to the Vision of the WLWP, 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 this 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 and 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 local planning authority.

9.0 Communication Considerations

9.1 The Regulation 19 consultation engagement measures set out in the Council's Statement of Community Involvement were followed, and were supplemented by a drop-in session at the Civic Centre. Advice was also sought from the Communications team regarding additional actions that could be taken. These included placing articles in the Members' Information bulletin and on Viva Engage. Fuller details of the engagement activities are set out in paragraphs 3.22 and 3.23 above.

9.2 As soon as reasonably practicable after submission of the WLWP to the Secretary of State, the post-submission measures set out in the Council's Statement of Community Involvement will be carried out. These include making copies of relevant documents available on the Council's website, at the Civic Centre and at other locations and publicising details of where, when and how these can be viewed.

Related document(s) for reference:

Cabinet 27/7/26 Decision - West London Waste Plan Regulation 19 Consultation

Report sign off:

Jehan Weerasinghe
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