



HILLINGDON
LONDON



Residents' Services Select Committee

Councillors on the Committee

Councillor Peter Smallwood OBE (Chair)
Councillor Ekta Gohil (Vice-Chair)
Councillor Darran Davies
Councillor Jas Dhot
Councillor Kamal Preet Kaur (Labour Lead)
Councillor Elizabeth Garelick
Councillor Jagjit Singh

Date: WEDNESDAY, 18
FEBRUARY 2026

Time: 7.00 PM

Venue: CR5

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Terms of Reference

Residents' Services Select Committee

To undertake the overview and scrutiny role in relation to the following Cabinet Member portfolio(s) and service areas:

Portfolio(s)	Directorate	Service Areas	
Cabinet Member for Community & Environment	Place	Green Spaces (incl. Woodlands, Colne Valley)	
		Crematorium Services	
		Waste Services	
		Flooding & watercourses	
		Environmental Projects (incl. Chrysalis, Street Champions, Alleygating & Ward Budgets)	
		Climate Change (incl. air quality) – cross-cutting brief	
		Homes and Communities	Library Services
			Theatres, Museums & Cultural Services
			Leisure Services and Centres
			Community Safety & Community Cohesion (incl. CCTV)
			Trading Standards, Environmental Health & Licensing (incl. Safety of Sports Grounds)
			Imported Food Office
			Anti-Social Behaviour and Localities
		Cabinet Member for Planning, Housing & Growth	Place
Parking & Parking Enforcement			
Emergency Response			
Adult Services & Health	Mortuary		
	Planning Services (incl. planning policy, building control, planning enforcement, specialist planning & conservation areas)		
	Regeneration (incl. town centres, master planning)		
Economic Development (incl. growth strategy, business engagement, inward investment & worklessness)			
Local Impacts of Heathrow Expansion (cross cutting brief)			
Local Impacts of High Speed 2 (cross-cutting brief)			
Homes & Communities	Housing Strategy & Commissioning (incl. housing policies & standards, assessment of housing stock size & condition and the		

		commissioning of housing stock repairs and housing stock acquisitions)
		HRA Strategy and delivery plan (operational delivery in Place and Cabinet Member for Corporate Services & Property)
		Housing Management (incl. tenancy management)
		Housing Options and Homeless Prevention
		Private Sector Housing

STATUTORY COMMITTEE	<u>Statutory Crime and Disorder Scrutiny</u>
	<p>This Committee will act as a Crime and Disorder Committee as defined in the Crime and Disorder (Overview and Scrutiny) Regulations 2009 and carry out the bi-annual scrutiny of decisions made, or other action taken, in connection with the discharge by the responsible authorities of their crime and disorder functions.</p> <p><u>Duty of partners to attend and provide information</u></p> <p>The Crime and Disorder (Overview and Scrutiny) Regulations 2009 permits this Select Committee to make a request in writing for information to bodies who form the local Crime and Disorder Reduction Partnership (Safer Hillingdon Partnership), which includes the Police. The Committee should scrutinise the work of the partnership at least once a year and may also require the attendance before it of an officer or employee of a responsible authority or of a co-operating person or body in order to answer questions. The Committee may not require a person to attend unless reasonable notice of the intended date of attendance has been given to that person.</p>

Agenda

- 1 Apologies for Absence
- 2 Declarations of interest in matters coming before this meeting
- 3 To receive the minutes of the previous meeting 1 - 18
- 4 To confirm that the items of business marked as Part I will be considered in public and those marked Part II will be considered in private

Part I - Members, Public and Press

- 5 Homelessness and Rough Sleeping Strategy Consultation Draft 19 - 132
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Minutes

RESIDENTS' SERVICES SELECT COMMITTEE

8 January 2026



HILLINGDON
LONDON

Meeting held at Committee Room 5

	<p>Committee Members Present: Councillors Peter Smallwood (Chair), Ekta Gohil (Vice-Chair), Darran Davies, Jas Dhot, Kamal Preet Kaur (Labour Lead), Elizabeth Garelick and Jagjit Singh</p> <p>Officers Present: Matt Davis – Director – Strategic and Operational Finance Dan Kennedy (Corporate Director of Residents Services) Ceri Lamoureux – Head of Finance Steve Muldoon (Corporate Director of Finance) Bernard Ofori-Atta – Head of Finance Liz Penny - Democratic Services Officer Ian Thynne - Head of Environmental Specialists Richard Webb (Director Community Safety & Enforcement)</p> <p>Others Present: Kenny McCamlie – APCOA Contract Manager Kedar Maharjan – APCOA</p>
126.	<p>APOLOGIES FOR ABSENCE (<i>Agenda Item 1</i>)</p> <p>There were no apologies for absence.</p>
127.	<p>DECLARATIONS OF INTEREST IN MATTERS COMING BEFORE THIS MEETING (<i>Agenda Item 2</i>)</p> <p>None.</p>
128.	<p>TO RECEIVE THE MINUTES OF THE PREVIOUS MEETING (<i>Agenda Item 3</i>)</p> <p>RESOLVED: That the minutes of the meetings dated 6 and 27 November 2025 be agreed as an accurate record.</p>
129.	<p>TO CONFIRM THAT THE ITEMS OF BUSINESS MARKED AS PART I WILL BE CONSIDERED IN PUBLIC AND THOSE MARKED PART II WILL BE CONSIDERED IN PRIVATE (<i>Agenda Item 4</i>)</p> <p>It was confirmed that all items of business were marked Part I and would be considered in public.</p>
130.	<p>MONTHLY BUDGET AND SPEND REPORT (<i>Agenda Item 5</i>)</p> <p>The Corporate Director for Residents' Services, Dan Kennedy, presented the Month 7 budget and spend report. Other officers in attendance to respond to Members' questions were Steve Muldoon - Corporate Director of Finance, Matt Davis - Director – Strategic and Operational Finance, Ceri Lamoureux - Head of Finance and Bernard</p>

Ofori-Atta - Head of Finance.

It was reported that the projected net overspend for services within the remit of the Residents' Services Select Committee stood at £7.8 million; a figure that had remained largely unchanged since Month 6. The pressures contributing to this position had been driven primarily by homelessness demand, which had been reported previously to the Committee.

It was explained that a number of proactive measures had been undertaken during the year. One notable initiative involved efforts to control temporary accommodation expenditure through the introduction of caps and other controls. This initiative had produced an estimated cost reduction of nearly £8 per unit, per night, amounting to just over £2 million in cost avoidance for the year. Despite this, the overall situation had remained exceptionally challenging, particularly in relation to securing accommodation in the private rented sector and accessing other forms of affordable or social housing. These challenges had been exacerbated by high levels of demand, including increased evictions from private rented homes, evictions by friends and family, and presentations from households fleeing domestic abuse.

Members were informed that a series of proposals had been set out in the subsequent agenda item to address these pressures, including growth proposals, budget rebasing and a range of further initiatives planned for the next year. These would include new efforts to secure private rented accommodation, continuation of the year's ambitious programme to acquire additional social rented properties, and partnership work with housing associations to increase supply. It was acknowledged that these efforts were operating in a highly challenging environment, consistent with the experience of other London boroughs and local authorities nationally. It was emphasised, however, that activity would continue and innovation would be pursued wherever possible.

It was also reported that the Housing Revenue Account was projecting a breakeven position and that reserves had been maintained at £15 million, which was considered positive. The Committee was advised that, of the £11.7 million savings target within its remit, £5.6 million (around half) had been banked and were on track to be delivered. A further £3.5 million (around 30%) had been classed as amber and were expected to be delivered, though possibly not fully within the current financial year. It was noted that some savings were deemed undeliverable and would be written out of the budget, with several identified as legacy targets no longer achievable.

Councillors referred to page 20 of the report, noting a £0.9 million shortfall in garden-waste subscription income as of Month 7. Clarification was requested on whether the shortfall had increased between Months 6 and 7 or whether the position had stabilised, allowing a more reliable full-year forecast.

In response, it was explained by officers that the position had largely stabilised. Income was reported at approximately £1.6 million, against the original £2.5 million target. Officers stated that, as the service had been a new subscription scheme introduced part-way through the year following consultation, income estimates had been based on the best available benchmarking from other boroughs. It was added that schemes of this nature tended to mature over two to four years, with steady growth expected before levelling off.

Members asked how the identified shortfalls, including slippages and undeliverable savings, were being mitigated. It was stated that the report outlined the figures but not

the associated improvement plan, and further detail was requested on actions being taken, how replacements for undeliverable savings would be identified, and how mitigation would be monitored.

Officers responded that some savings targets would never be achievable and were therefore being rebased, as shown in the next agenda item. It was explained that a wide range of control measures had been introduced corporately, including spend controls requiring panel approval for expenditure over £500, strengthened contract compliance, and recruitment controls. These measures were described as significant mitigations. It was emphasised that, in demand-led statutory services, total elimination of pressures was not possible; instead, actions focused on reducing overall costs rather than preventing expenditure outright. Officers noted that further detail could be provided outside the meeting if required.

Councillors observed that detailed information would help the Committee scrutinise trends more effectively. Clarification was sought regarding the effect of recruitment controls on day-to-day operations, and concern was raised about references to redundancies. They asked what assessments had been undertaken regarding the impact of such actions on service delivery.

It was explained that all service changes were subject to scrutiny by senior officers, finance and HR, as well as the corporate management team. It was confirmed that the Council's priority was to maintain frontline services and statutory duties. Any proposed changes underwent an equalities impact assessment. Officers reported that recruitment-related adjustments were largely driven by redesigned ways of working and efficiencies, with an emphasis on collaborative working rather than reducing service provision.

The Committee requested an update on homelessness, including the number of households in emergency accommodation, the scale of pressure, associated costs, and whether any levelling-off was expected. In response, it was reported that approximately 1,800 households were in temporary accommodation, with around 800 placed in higher-cost nightly or spot-purchased provision. It was confirmed that the Council had negotiated firmly with providers and introduced caps, achieving reduced costs. The challenges were described as significant and largely outside the Council's control, including unexpected arrivals through Heathrow and sharply rising private-sector rents, with some families facing increases of £400–£500 per month. Officers stated that mitigation efforts included persuading landlords to retain tenants, identifying alternative accommodation, expanding acquisition programmes, and developing new models for housing supply. It was reported that more than 200 additional homes for social rent would be acquired during the year. The underlying issue was described as one of affordability, with many families either unable to enter or unable to remain in the private rented sector.

In response to their questions regarding the high overspend and final forecast variance and whether these were attributable to a lack of new housing supply and slow delivery of new homes, Members were advised that turnaround times for existing Council stock were generally strong and that further opportunities were being explored to maximise the use of available stock, including downsizing incentives. It was reported that significant investment was being made in new schemes such as Hayes Town Centre and Avondale. However, lead-in times for new developments and market stagnation—particularly the reluctance of developers to proceed with blocks of flats unless a full sell-through was achievable—were described as constraints. When asked whether

homelessness applications had continued to rise, officers reported a stable but high volume of 100–120 applications per week.

Members sought clarification about the sustainability of reducing revenue contributions to capital schemes in order to maintain HRA balances, referencing page 21 of the report. Officers responded that the arrangement was sustainable and formed part of the budget's design. It was stated that the revenue contribution acted as a balancing mechanism and that the changes involved relatively modest amounts within the wider financial framework.

Councillors referred to the cost of the waking-watch service and asked whether a phased exit plan existed, noting that the report lacked such detail. In response, it was confirmed that the report before the Committee represented a snapshot of the financial position rather than an in-depth thematic report and that more detailed reporting could be provided separately. It was explained that the waking-watch arrangement had been introduced to prevent residents in affected private accommodation from being required to leave their homes following a likely prohibition notice from the London Fire Brigade. Officers confirmed that the Council had incurred unavoidable costs but reported that the Council was now close to exiting the waking-watch arrangement, subject to final sign-off.

RESOLVED: That the Select Committee:

- 1. Noted the budget monitoring position as of October 2025 (Month 7) for the Council; and**
- 2. Noted the budget monitoring position as of October 2025 (Month 7) for the services within the remit of the Residents' Services Select Committee.**

131. **CABINET BUDGET PROPOSALS 2026/27** (*Agenda Item 6*)

The Corporate Director of Finance, Steve Muldoon and the Corporate Director for Residents' Services, Dan Kennedy, presented the report. Other officers in attendance to respond to Members' questions were Matt Davis, Director – Strategic and Operational Finance, Ceri Lamoureux, Head of Finance and Bernard Ofori-Atta, Head of Finance.

It was explained that the overall Council budget had been reviewed by the Corporate Resources and Infrastructure Select Committee earlier in the week, with a more detailed discussion available via the meeting recording. The Corporate Director of Finance outlined the wider financial context, noting that the Medium-Term Financial Strategy, published in December 2025, reflected a highly challenging environment driven by rising demand, market pressures in social care and temporary accommodation, and inflation outpacing funding levels.

It was noted that Government funding for Hillingdon had increased but would be phased in over three years. Council reserves had been significantly depleted in recent years, reducing financial resilience. As a result, the Council required budget growth to meet unavoidable pressures and had identified a number of difficult savings proposals. To balance the 2024/25 budget legally, the Council was seeking Exceptional Financial Support (EFS), which required central Government approval and repayment.

Members heard that all savings proposals were owned by senior officers, had been through internal challenge sessions, and were intended to be realistic rather than

aspirational. Further detailed work was still required, particularly on high-risk or high-value proposals, and ongoing improvements to demand modelling and savings monitoring would continue.

It was noted that the meeting would focus on the proposals within the Residents' Services Select Committee's remit, including assumptions, savings, growth proposals, risks, and service impacts. The output would be the Committee's feedback and recommendations to Cabinet, to be considered alongside responses to the six-week public consultation. Final budget decisions were scheduled for Cabinet on 19 February and full Council on 26 February 2026.

It was noted that a net budget increase of approximately £15.8 million had been proposed within the remit of Residents' Services. This increase was composed of nearly £30 million in growth alongside £14 million in savings. It was explained that the majority of the growth had been driven by demand pressures, particularly in relation to homelessness, as well as the need to address legacy income targets and other longstanding budget pressures. An example was provided in which the budget for tree inspection and maintenance had been proposed for an uplift of £130,000 to ensure statutory duties continued to be met as tree numbers expanded across the Borough.

Members were informed that the efficiencies and savings proposals had been presented as arising from a range of service areas, with an emphasis placed on doing things differently. It was highlighted that greater collaboration across services, deployment of digital technology, expansion of self-service options, and process improvements designed to achieve tasks correctly at first attempt were being prioritised. Joint working both within Residents' Services and across the wider Council was expected to generate reductions in expenditure.

With reference to the proposed 10% increase in discretionary fees and services, Members sought clarification as to how the increase supported continued value for money for residents, whether the Council would remain benchmarked among the lowest-cost boroughs in London, and whether comparative information from neighbouring authorities could be provided. It was stated by officers that the Council had continued to be recognised as a value-for-money, high-quality service provider, supported by strong benchmarking across adult social care, children's social care and housing services. It was confirmed that the Council's fees and charges had historically remained positioned at the lower end relative to other London and West London boroughs. Officers noted that the proposed increase of the waste subscription charge to £77 would still leave the Council's costs lower than neighbouring authorities operating fortnightly collections, while Hillingdon continued to offer weekly collections. It was confirmed that additional benchmarking data could be made available outside the meeting.

A question was raised by Members concerning how the increase in fees might affect take-up of services, with reference to a previous decline in green waste subscriptions. It was asked what the implications would be should insufficient numbers of residents use those services and what measures had been considered. In response, Members were informed that all proposals had undergone significant testing, including assumptions around expected income. Where increased fees carried uncertainty, income projections had been cautiously reduced to account for potential reductions in demand for discretionary services. A further question was posed as to whether such reductions could prevent the Council from achieving planned savings. Officers were confident that income levels set out in the budget would be achieved. It was stated that

where new services carried greater uncertainty, income projections had been intentionally lowered. Reference was also made to corporate contingency funds maintained to mitigate non-delivery of savings or unexpected cost pressures.

Housing budget proposals were then queried. Councillors referred to the planned £8.5m savings and asked whether this represented continuation of current initiatives or acceleration of existing work, noting the scale of the existing pressures. Officers explained that a wide programme of initiatives was under way, particularly aimed at increasing access to private rental sector accommodation. It was reported that active discussions were ongoing with agents and landlords to increase supply, prevent homeless households from entering temporary accommodation, and to expedite move-on pathways. Various models were described, including temporary placements that could convert into private-rented tenancies, thereby discharging homelessness duties. It was explained that negotiations for multi-year arrangements were being explored to secure lower pricing from landlords and agents. It was further stated that a portion of the £8.5m savings related to inflation control, whereby keeping inflation below projected levels would contribute to the target. Officers acknowledged the challenge but confirmed that proactive work was already being undertaken.

The Committee sought clarification in relation to potential future arrivals and asked whether any advance notice from government had been provided and what contingency existed should such pressures reoccur. It was confirmed that no prior notice was given because the arrivals involved UK nationals acting independently. It was stated that contingency funding had been built into the budget for unforeseen increases in demand. It was emphasised that lobbying was being undertaken to secure government funding, as only a small number of port-authority councils had been affected.

A question was raised about emergency tree maintenance provision. Councillors observed that limited budget seemed to have been allocated for unplanned pressures, such as storm-related tree damage, and asked how the associated risks were being managed and whether a dedicated external agency might offer improved budget stability. Officers stated that statutory tree safety duties would always be fulfilled, regardless of in-year budget pressures. It was confirmed that a corporate contingency fund existed for unforeseen emergencies. Officers also highlighted a proposed £430k increase in the tree maintenance and inspection budget, intended to strengthen proactive maintenance and reduce the likelihood of storm-related failures. A follow-up question asked whether further funding could be secured if the £430k were exhausted. Officers stated that contingencies could be used, or costs could be mitigated elsewhere within service budgets. The Chair added that the £430k represented an increase, not the total budget.

Members asked for information on the number of people sponsored under the Council's sponsorship policy and the income generated. It was confirmed that detailed data would be provided separately.

Councillors raised questions regarding the Green Lane civic amenity site, where tables within the budget documentation appeared to present seemingly duplicated figures of £70k and £165k. It was explained that the two £70k figures related to separate items—one a saving offset by software costs—and that the £165k represented a pressure from undelivered savings carried forward into the next financial year.

Waste collection efficiencies were then queried, with Councillors asking how a

significant projected saving would be achieved. Officers explained that a service review was under way, focusing on waste prevention and diversion to lower-cost disposal streams. Initiatives such as the “simpler recycling” programme and food-waste diversion were highlighted as key cost-reduction mechanisms. Members asked whether the roll-out of food caddies to 20,000–25,000 flats was part of this work, and it was confirmed that the rollout to flatted properties was imminent and would significantly reduce costs by diverting food waste from residual streams.

The Committee asked how confident officers were that all proposed savings would be delivered, and what proportion of them could be considered secure. It was stated that all proposals had been through rigorous scrutiny, and that every efficiency was intended to be delivered. It was noted that, where external factors prevented delivery, directors would manage pressures through cost-control measures and internal mitigations. It was also stated that new spend-control measures required approval for all new expenditure and were expected to support delivery of savings.

A question was asked regarding the effectiveness of consultations, noting that past consultations had not always aligned with final decisions. Concern was raised as to how resident feedback could be ensured meaningful consideration. The Chair observed that consultations were not referendums and that final decisions were the responsibility of Cabinet and, ultimately, the electorate during elections. It was confirmed that the Councillor’s concerns would be recorded in the minutes.

Members sought clarity concerning fair funding and EFS. They asked whether fair funding was also conditional and whether it required Council Tax to be increased to the referendum limit over three years. Officers confirmed that the government’s figures had been predicated on all councils applying a 4.99% increase in each of the three years. It was explained that business-rate assumptions carried risk, particularly relating to appeals, and that EFS constituted borrowing requiring repayment over 20 years, plus interest if borrowed from the Public Works Loan Board.

Councillors requested further detail on investment in major capital projects, including the water sports facility and crematorium refurbishment, and asked whether these projects were expected to generate sustainable income. Officers stated that the capital programme encompassed schools’ expansion, the new leisure centre, new council housing, and significant housing investment to meet the decent homes standard. The water sports facility was described as a modern replacement offering improved amenities, while the crematorium improvements were intended to maintain service quality and introduce operational efficiencies. It was confirmed that income generation was sought where feasible.

A further question concerned how contingency funding would absorb unplanned pressures such as resident services, community safety needs, and emergency works. In response, it was confirmed that directors would be expected first to manage pressures within their budgets, including through internal mitigations and cross-service efficiencies. Underspends would be banked to offset pressures elsewhere and spend-control measures were expected to encourage cultural change and prevent unnecessary expenditure.

In response to Members’ questions regarding how the Council determined when efficiencies were negatively affecting frontline services, it was stated that thorough appraisals and impact assessments were undertaken during the planning process. If unforeseen impacts emerged during implementation, officers would reassess the

proposal and present options to Members, ensuring that residents remained prioritised.

It was confirmed that comments from the Committee would be delegated to the Democratic Services Officer, in conjunction with the Chair and in consultation with the Opposition Lead, for submission to Cabinet.

RESOLVED: That the Select Committee:

1. **Noted the draft revenue budget and Medium-Term Financial Strategy proposals for 2026/27 to 2030/31 relating to services within the Committee's remit;**
2. **Considered and commented on the financial assumptions, savings proposals, growth pressures, service impacts and delivery risks within those proposals; and**
3. **Agreed that comments to Cabinet for consideration as part of the final budget proposals to be presented to Council in February 2026, be delegated to Democratic Services in conjunction with the Chair and in consultation with the Opposition Lead.**

132. **PERFORMANCE REPORT** (*Agenda Item 7*)

Dan Kennedy, Corporate Director – Residents' Services, was in attendance to respond to any questions and queries from Members in respect of the performance report as set out in the agenda pack.

Councillors commented that the report contained several positive indicators, including the Council having the fourth-lowest net expenditure per 100,000 residents in London and strong performance in housing landlord services.

Members observed that the report referenced the delivery of 245 new council homes, but they believed this figure represented a gross total and did not account for homes lost through Right to Buy. An accurate net position was therefore requested, and it was agreed that officers would provide this outside of the meeting. The Corporate Director noted that in previous years around 50 homes per year had been lost through Right to Buy, though that number might have increased slightly following a surge in applications when the government reduced the available discount.

Councillors sought clarification regarding recycling contamination levels, noting that these levels had not been quantified in the report. They expressed a desire to understand how much of the Borough's waste and recycling was being contaminated so that potential problem areas could be identified. It was confirmed that the relevant data could be provided and it was suggested that the matter could be fully explored at the next waste-focused Committee session. The Chair agreed and asked that the Democratic Services Officer record this as an item for discussion in the forthcoming in-depth waste session.

The Committee then sought clarification on the statement that one-third of council homes in Hillingdon had failed the decent homes standard. Members observed that this appeared inconsistent with the Council's claims of strong performance in repairs and asked how the two positions could be reconciled. It was explained that the decent homes standard related to physical components such as kitchens, bathrooms, windows and energy efficiency, whereas repair performance related to tenant experience, including response times and achieving a first-time fix. It was stated that tenant

satisfaction remained high. Officers reported that the 30% non-decent figure reflected the position as of 31 March 2024, but significant progress had since been made. It was reported that Cabinet had previously approved £108 million for improvements, that non-decency was expected to fall to approximately 14%–15% by the end of March, and that the Council was on track to reach 5% non-decent homes within two to three years. It was confirmed that regulators had expressed no concerns regarding progress or trajectory.

Members raised a question regarding homelessness pressures linked to Heathrow. Reference was made to a previous report indicating that around 40 families had presented at Heathrow. They asked how many rough sleepers and how many families within the current reporting period had originated from Heathrow-related presentations. Officers confirmed that this information was held and could be provided through the Chair. The Chair stated that it would be appropriate to include the information within the February agenda item on the homeless and rough sleeping strategy and confirmed that this would be arranged.

Councillors referred to a chart showing data on vacant dwellings and asked for clarification. It was noted that the report stated that vacant dwellings were re-let within an average of 30.64 days, which had been reported as 14 days faster, yet the narrative later indicated performance remained 14% below the England average. Members sought clarification on how these statements aligned, as a 30-day void period appeared lengthy. It was acknowledged that the turnaround time could appear long but it was explained that a large number of mandatory checks were required before a property could be re-let, including health and safety inspections, gas safety, asbestos assessments and occasionally significant repairs or replacements, such as boiler installations. It was stated that as the proportion of non-decent homes decreased, the extent of major works required before re-letting would also diminish, resulting in improved turnaround times.

It was agreed that comments from the Committee would be submitted to full Council. The Chair confirmed that comments would be delegated to the Democratic Services Officer in conjunction with the Chair and in consultation with the Opposition Lead, in line with Committee practice.

RESOLVED: That the Select Committee:

- 1. Noted the six-month performance report for 2025/26, as attached in Appendix 1; and**
- 2. Agreed that Select Committee comments to be presented to full Council be delegated to Democratic Services in conjunction with the Chair and in consultation with the Opposition Lead.**

133. **PARKING ENFORCEMENT** (*Agenda Item 8*)

Richard Webb, Director of Community Safety and Enforcement presented the report which provided general background on the Council's parking enforcement approach and outlined key data. It explained that enforcement operations were delivered through a partnership with APCOA, whose contract had commenced in 2022 and was due to end the following year, with options available for extension. The contract scope, as described in the report, included the provision of Civil Enforcement Officers (CEOs) – also referred to as parking wardens – parking and moving-traffic enforcement cameras, and ancillary services such as cash collection.

Members heard that the Civil Enforcement Officers were deployed to monitor car parks to ensure that parking payments were made, to patrol on-street parking bays, and to enforce parking restrictions, including yellow lines and all permit zones. The contract contained a range of key performance indicators, particularly related to deployment levels, contracted service hours, acceptable error rates in Penalty Charge Notice (PCN) issuing, and responsiveness to the public enforcement line.

It was confirmed that the Council's parking team engaged with APCOA frequently, with daily operational contact and monthly performance meetings to review deployment patterns, emerging issues, and operational data. Formal annual reviews were also undertaken. Deployment decisions were jointly agreed and informed by a broad evidence base, including patterns of non-compliance, school pick-up and drop-off priorities, resident and elected member feedback, and other data identifying areas of highest need.

The challenges posed by the Borough's large and diverse geography were noted, which required CEOs to cover wide areas. To address this, Members were informed that the Council had recently leased a vehicle equipped with Automated Number Plate Recognition (ANPR) technology to support more efficient monitoring of extensive areas. The Council was evaluating the effectiveness of this approach and actively reviewing CEO deployment models to improve coverage and better respond to resident priorities.

Kenny McCamlie (Contract Manager) and Kedar Maharjan of APCOA were also in attendance. The Contract Manager addressed Members of the Select Committee thanking them for the opportunity to attend and noting APCOA's long-standing relationship with the Borough. He explained that APCOA's head office was located in Uxbridge and that its European headquarters had relocated there in the final quarter of the previous year. He also emphasised the company's strong commitment to Hillingdon and Uxbridge, noting that the organisation also managed a major contract at Heathrow and employed over 500 people within the Borough.

In relation to parking enforcement, Members heard that the organisation employed approximately 60 staff and maintained a flexible employment model that enabled 20–30% of the workforce to operate flexibly. The Contract Manager highlighted the challenging nature of the Civil Enforcement Officer (CEO) role, noting that officers worked in all weather conditions and often faced hostility despite performing a vital public service. It was confirmed that the organisation worked closely with the local police sergeant in Uxbridge to improve staff safety, develop methods for officers to protect themselves, and pursue prosecutions where necessary. He reported having achieved successful prosecutions, including two in the past year, and noted additional incidents of lower-level but often malicious abuse.

The Contract Manager expressed appreciation for any recognition the Committee could give to frontline officers and described the collaborative working relationship with the Council's team. He stated that both parties worked hard to ensure that the service provided to the Borough was efficient and cost-effective. The introduction of the new ANPR vehicle was being used as an opportunity to reassess service delivery, strengthen data-led deployment, and ensure that officers were sent to areas of known non-compliance. It was noted that year-on-year increases in Penalty Charge Notice (PCN) numbers were one indicator that deployments were targeting appropriate locations, although PCN volumes could not be treated as a target.

Councillors noted that Members of the Committee had previously undertaken frontline observations of Civil Enforcement Officers (CEOs). They enquired whether the CCTV control room had been equipped with colour monitors or a radio link to receive *code red* alerts, noting that under-reporting of such incidents had been previously identified. It was asked whether this option had been explored, and if so, why it had not been implemented. In response, officers advised that APCOA staff were not based in the Council's CCTV control room, which remained a secure, supervised-access environment and was not staffed 24/7. Redeploying the officer who ordinarily handled CEO radio communications into the control room had not been considered viable.

Members suggested that, although placing staff permanently in the control room might be impractical, providing a live radio link would allow CCTV staff to hear *code red* calls and activate cameras to support CEO safety. An incident witnessed by Councillors was cited, in which a CEO's device had been taken from them during a distress call. Officers explained that previous reviews had identified significant operational complications. When a *code red* was triggered, APCOA's dedicated control room was already fully engaged in supporting the CEO and, where necessary, contacting the police. CCTV staff simultaneously received multiple other inputs and could not guarantee priority handling. It was emphasised that CEO body-worn cameras were active at all times and pressing the *code red* button often deterred aggressors. Training had been developed with the police to encourage CEOs to move away from danger rather than remain in proximity until officers arrived. Over-involvement by multiple parties during emergencies had also been identified as unhelpful.

The Committee asked whether CEOs had access to "people-safe" technology, GPS connectivity, or devices enabling communication once *code red* was triggered. APCOA confirmed that activating the red button opened a live microphone, alerted nearby CEOs, and automatically transmitted the officer's location to APCOA's control room. GPS information on handheld devices also enabled emergency services to be directed to the officer's location if they were unable to speak.

Members queried 420 recorded verbal abuse incidents and 31 *code red* incidents, asking whether under-reporting might be linked to the diverse ethnic backgrounds of CEOs. Questions were raised regarding whistleblowing channels, reporting confidence, and how APCOA ensured staff safety in a challenging environment where abuse could relate both to role and ethnicity. APCOA responded that CEOs were strongly encouraged to report incidents, including "code blues"—lower-level but potentially harmful incidents, often racist in nature. Although such behaviour generally originated from passers-by and could not easily be prevented, reporting enabled pattern-spotting, dual deployment and targeted policing support. A confidential reporting line was available, although management actively fostered direct reporting relationships. CEOs were reminded that under-reporting prevented the organisation from building an accurate picture of risks.

Councillors sought clarifications as to whether racist incidents were logged as hate crimes and formally passed to the police. It was explained that staff were encouraged to do so and that an online reporting template had been jointly developed with the local Police Sergeant. Misconceptions—such as the belief that prosecutions might restrict international travel—were actively addressed. APCOA reported higher prosecution success than many boroughs but acknowledged that further improvements were welcome.

Councillors raised concerns about CEOs frequently being observed in groups of four to six in high-footfall areas, which appeared to reduce enforcement efficiency. It was asked whether this was common and how CEOs were being deployed effectively. In response, APCOA confirmed that CEOs were remote workers, and several operational reasons could explain groupings, including shift changes and deployment patterns. However, it was acknowledged that improvements were needed. GPS and live mapping were used to monitor CEO locations, and Council officers also had access. Human instinct to gather in groups existed, and management actively countered it through performance monitoring and training. Councillors were encouraged to report instances for review.

Members then asked how the Council's parking enforcement hotline data was logged—specifically whether it was recorded at road level—and how APCOA used that information to identify hotspots. APCOA confirmed that all hotline reports entered its system and were used to identify persistent problem areas, alongside complaints received by Council officers and Members. Data recorded during each visit—such as whether a vehicle was moved on or a Penalty Charge Notice (PCN) was issued—supported proactive deployment.

In response to Members' questions regarding the CCTV enforcement vehicle, its benefits, and its role in CEO and public safety, it was explained that the vehicle employed automatic number plate recognition to scan permit zones efficiently—something impossible on foot. Although officers still had to exit the vehicle to issue certain PCNs, use of the vehicle enabled redeployment of foot patrols to high-non-compliance areas.

A further question concerned repeated pavement parking near schools and what actions were taken to address high-risk areas. APCOA stated that significant resources were dedicated to school patrols, although enforcement could be challenging. Parents' responses varied, and statutory observation periods limited immediate action. Councillors were encouraged to submit specific locations for review.

Councillors asked about the three CEOs assigned as quality monitors, including their deployment and how data captured through their cameras had been used. It was explained that these officers were deployed daily, with data uploaded to the Council's digital system. Council officers would need to provide details on how the data was analysed, and APCOA committed to arranging this.

Questions were then raised about how required hours and PCN issue rates compared with other London boroughs and how enforcement officers were trained. APCOA outlined its training programme: online modules, British Parking Association-regulated exams, supervised local instruction, pairing with senior CEOs, and a strict sign-off process. Differences in observation times (e.g., instant for school zig-zags, 5 minutes for permit bays) were explained, and APCOA acknowledged that inconsistent answers given to residents should not have occurred.

Further questions were raised regarding enforcement of motorcycle parking, particularly relating to delivery drivers. APCOA explained that motorcycles were generally exempt from displaying pay-and-display tickets unless traffic orders specified otherwise. Restrictions had been updated in some areas (e.g., Ruislip) following Cabinet approval. In relation to complaints about deployment at Ruislip Lido, APCOA noted that winter and summer deployment patterns existed but could be reviewed.

Councillors asked whether CEOs worked to targets. It was confirmed that no PCN-issuing targets existed; however, issue rates per hour were analysed to identify anomalies, training needs, or deployment inefficiencies.

The Committee sought further clarification regarding a reduction in PCNs issued by CCTV cameras, noting that camera numbers had decreased from 120 to 75. It was asked whether the reduction in PCNs had resulted from fewer cameras rather than improved compliance. APCOA explained that compliance had improved particularly at new yellow-box junction enforcement sites. Older cameras with extremely low detection rates had been removed because replacement costs were unjustifiable.

The Chair concluded by thanking APCOA representatives for their comprehensive answers and invited APCOA to provide written information on wider enforcement services. A site visit for Members was also suggested.

RESOLVED: That the Select Committee:

Noted the contents of the report which provided background information to support the scheduled question and answer session on parking enforcement in the Borough, and in particular the ongoing work with APCOA through which they had brought forward initiatives to improve facilities for motorists whilst generating an income for the Council.

134. **CLIMATE CHANGE PROGRESS REPORT** (*Agenda Item 9*)

Ian Thynne, Head of Environmental Specialists, was in attendance to respond to Members' questions in relation to the Climate Change Progress Report included in the agenda pack. The Chair thanked him for his thorough, comprehensive and interesting report.

Councillors asked how confident the Council was that climate-change targets and associated deadlines would be met. The Head of Environmental Specialists responded that confidence was difficult to quantify because a trend analysis was still being undertaken to map the routes toward achieving carbon neutrality by 2030. He explained that climate action was **not** a statutory duty for local authorities and therefore competed with other pressures. He confirmed that meeting the targets would be challenging, although substantial progress had been made since the declaration of the climate emergency. A programme of activity and the release of £1.5m in Section 106 funding for community-facing carbon-reduction projects were highlighted as supporting elements, though the full cost and pathway to the targets had not yet been fully established.

Members enquired what major challenges existed in relation to fleet decarbonisation and whether electric-vehicle capacity could be retained in the future. It was explained that performance tracking had been difficult due to the absence of detailed dashboards showing mileage and fuel consumption. It was stated that electric refuse vehicles were extremely expensive and that prioritising them could reduce the Council's ability to deliver other services. It was also noted that required charging infrastructure was not yet available. Therefore, the heavy fleet was likely to retain a carbon footprint in 2030, and offsetting measures would be required. Smaller diesel vehicles had already been replaced by electric models but refuse lorries and heavy vehicles were unlikely to be electric by 2030 due to replacement costs and operational constraints.

In response to Members' questions as to whether initiatives such as carbon monitoring or energy-efficiency schemes had been assessed for cost-effectiveness, it was confirmed that the Council sought not only carbon savings but also financial savings for residents. It was noted that carbon-saving measures—such as replacing Civic Centre gas boilers with air-source heat pumps—were designed to reduce long-term energy costs during periods of high market volatility. Monetary and carbon savings were embedded jointly within strategic planning.

Councillor enquired whether the Council had considered the use of hydrogen-powered fleet vehicles. It was confirmed that hydrogen vehicles remained largely at pilot-stage development. The Council's realistic focus was on electric vehicles and that hydrogen was not currently on the Council's agenda.

The Committee sought clarification as to whether Heathrow expansion or changes associated with the Cranford Agreement could slow local climate-action progress. It was confirmed that the recent Cranford Agreement decision involved redistribution of existing flight movements rather than an increase, so no additional carbon output would result from that change. It was noted that a third runway would have a major carbon impact, but calculation of aviation emissions fell within central government responsibility. The Head of Environmental Specialists explained that the Council's targets related to its operational emissions, while major emissions sources such as the airport, the M4, and the M25 fell outside its control.

Members asked whether future pay-per-mile charging—expected around 2028—had been factored into fleet-modernisation planning, particularly regarding electric and hybrid vehicles. It was stated that significant work was still required on fleet analysis, and current data gaps meant that the question could not yet be answered; upcoming work in the calendar year would provide greater clarity.

In response to their questions regarding how much of the Council's capital programme depended on external or grant funding, Members were informed that the Council's operating model centred on embedding carbon saving within existing structures rather than creating costly additional programmes. It was stated that housing-improvement programmes, public-sector decarbonisation grants and Section 106 funding had been key sources of support. While grant funding remained useful, it was noted to be decreasing, and the Council would therefore continue to combine internal efficiencies with external funding where possible.

Councillors asked whether there were plans to install new electric-vehicle charging points in Council areas, and how many were planned for the year. In response, the Head of Environmental Specialists noted that the Council had joined the West London EV charging scheme and continued to use air-quality-related Section 106 funds. He confirmed that the EV strategy was being reviewed for increased ambition and that further rollout—especially on-street charging—was expected. He also described expanded tree-planting efforts and the development of "climate parks," providing cooler shaded areas and increased carbon sequestration.

The Committee sought further clarification as to how decisions were made regarding the replacement of large mature trees with smaller saplings, noting residents' concerns about environmental value. It was explained that the Borough planted tens of thousands of trees annually, far exceeding its loss rate. Although a precise carbon-equivalency calculation between mature trees and mass sapling planting had not yet been undertaken, it was confirmed that overall planting volumes surpassed

losses. Developers were also required to contribute to biodiversity net gain, and HS2-related planting would add hundreds of thousands of additional trees.

In response to their requests for clarification as to how the Council engaged with volunteers and community groups—including those supporting Ruislip Woods—and how a proposed People’s Assembly would interact with such groups, Members were informed that the Head of Environmental Specialists met monthly with Friends of the Earth and worked with other volunteer organisations, though more engagement was desired. Increased community-facing work had been funded through Section 106 allocations, and the Cleaner, Greener Festival was cited as an example of joint working. Collaboration with Ruislip Woods Trustees was being explored to secure innovative management approaches and external funding support.

RESOLVED: That the Residents’ Services Select Committee noted the content of the Progress Report.

135. **SECTION 19 FLOOD INVESTIGATION** (*Agenda Item 10*)

Ian Thynne, Head of Environmental Specialists, was in attendance to respond to Members’ questions in relation to the Section 19 Flood Investigation report included in the agenda pack.

Members asked what lessons had been learned from the recent increase in flooding incidents, noting that these had been significantly more frequent than in previous years. The Head of Environmental Specialists responded that the primary lesson learned was that flooding had worsened as the climate had continued to change. He stated that the September 2024 events had been among the worst the Borough had experienced, with devastating impacts on residents in areas such as Ruislip and Northwood. Flooding remained an emotive subject because residents could go years without incident and then suddenly face displacement, property loss, and severe distress.

It was explained that the Council had struggled to keep pace with flood-risk management due to ageing drainage infrastructure, limited funding, and complex interactions with Thames Water. As a result, the Council had shifted toward innovative approaches using green spaces to reduce flood risk. Thirteen projects were being delivered through external Environment Agency funding, a significant achievement given the small size of the team. However, much of the Council’s work necessarily remained reactive, given the impossibility of predicting exactly where future flooding would occur. It was noted that, while proactive projects were being implemented in areas identified as vulnerable, flooding often had to occur before intervention could begin. When incidents did occur, the Council acted quickly; for example, after more than 100 properties were flooded at Ruislip Gardens, a flood action group had been established and a project identified to reduce future risk.

Members enquired whether improved funding and monitoring would enable better preparedness and risk prediction. It was confirmed that, while additional information and funding would be helpful, flooding ultimately depended on unpredictable weather conditions. Officers described the extreme rainfall of 2024, equivalent to a month’s worth falling in a single day, which exceeded the design capacity of many local schemes. It was emphasised that forecasting precise impacts was extremely difficult because outcomes depended on seasonal conditions, infrastructure state, and unpredictable variables. It was noted that residents needed clearer information about their flood-risk status and greater encouragement to undertake their own resilience

measures.

The Committee Members asked specifically about situations where blocked gullies and drains were contributing to local flooding. They queried whether the Council could recharge Thames Water for the administrative time spent chasing the company to resolve issues for which it was responsible. In response, it was explained that responsibilities were highly fragmented: Council gullies drained into the Thames Water sewer network, which then flowed into rivers managed by the Environment Agency. In practice, disputes frequently occurred over ownership of drainage systems beneath carriageways or at property boundaries. Reports were often passed back and forth between agencies, creating inefficiencies.

It was believed that costs for reporting or chasing Thames Water were not recovered and it was acknowledged that residents often did not understand which authority held responsibility. Engagement with Thames Water was described as difficult because it was required to prioritise spending its customers' money carefully, while the Council also had statutory duties. The national "common reporting tool," intended to streamline processes, remained some distance away from implementation.

Councillors sought further clarifications as to whether, in cases where the Council had undertaken work that later proved to be Thames Water's responsibility, cost recovery was pursued or could be expanded. The Head of Environmental Specialists agreed that this was an important issue and stated that he would raise the matter with the Highways team to provide a more detailed answer on cost-recovery mechanisms. He noted that Thames Water's operational teams had often been helpful in clearing networks when asked, although strategic cooperation remained challenging.

Councillors queried whether the growing use of concrete in new developments—and the resulting reduction in natural drainage—was being addressed through planning requirements. They proposed measures such as mandating that residents retain part of their front gardens as permeable surfaces. In response, it was clarified that new developments were already required to achieve Greenfield runoff rates and to incorporate sustainable drainage systems. The greater issue was existing dwellings, many of which had paved front gardens and numerous dropped kerbs. These longstanding changes had reduced infiltration capacity across the Borough and formed part of the legacy issues contributing to current flood problems. The Council was therefore focusing on encouraging residents to adopt measures such as water-butt installation to reduce runoff at household level.

Members enquired who was responsible for cleaning canals and rivers, given that residents often dumped large items such as mattresses and pallets in local waterways. It was explained that canals were managed differently from rivers: canals did not generally have floodplains because their water levels were artificially controlled, whereas rivers were managed by the Environment Agency. It was noted that dredging, often requested by residents, was costly and only provided short-term relief before silt re-accumulated. River maintenance responsibilities depended on ownership, and many residents were unaware that they legally owned and were responsible for maintaining sections of watercourses adjoining their properties. This complexity was part of the wider challenge the Council faced in managing local flood risk.

The Chair asked for clarification regarding a historical flood reference in the report and requested that wording be updated. He also sought further clarification as to how flood action groups (FLAGs) would be engaged in a manner that ensured expert voices were heard without overshadowing residents who had concerns but less technical

	<p>knowledge. The Head of Environmental Specialists stated that flood action groups served as the frontline link with affected communities and that residents' lived experience was crucial to understanding local flood mechanisms. The value of working with these groups was highlighted, noting that different areas had different histories and patterns of flooding. It was confirmed that engagement would continue to be strengthened to ensure balanced representation and effective collaboration.</p> <p>Members thanked the Head of Environmental Specialists for his report and for providing acronyms and abbreviations for ease of reference</p> <p>RESOLVED: That the Residents' Services Select Committee:</p> <ol style="list-style-type: none"> 1. Noted the findings of the Section 19 investigation and the scale of impacts across priority catchments; and 2. Noted the programme of actions for 2025/26, including targeted drainage improvements, community Flood Action Groups (FLAGs), and collaborative schemes with EA and TWUL.
136.	<p>FORWARD PLAN (<i>Agenda Item 11</i>)</p> <p>RESOLVED: That the Residents' Services Select Committee noted the Forward Plan.</p>
137.	<p>WORK PROGRAMME (<i>Agenda Item 12</i>)</p> <p>The Chair, Councillor Peter Smallwood, updated the Committee on the plans for the next few months and explained that these had already been discussed with the opposition leader, Councillor Kamal Kaur. He paid tribute to Councillor Bridges, the former chairman, thanked him for chairing the Committee diligently and fairly for many years and congratulated him on becoming the Cabinet Member for Residents Services. He also thanked Councillor Farley for his excellent work as the previous opposition lead.</p> <p>The Chair welcomed Councillor Singh and Councillor Dot to the Committee and outlined recent discussions about whether to undertake a mini-review. Although footway parking had been considered, it was ultimately felt that such a review would be too substantial to complete properly in the short time remaining in the administration. Instead, it was noted that the Committee planned to focus on a series of smaller topic-based discussions.</p> <p>He explained that the January meeting would examine parking enforcement with input from officers. Waste services were scheduled for February, and Councillor Bridges had been invited to attend alongside the Corporate Director. In March, it was confirmed that the Committee would look at community safety and cohesion, inviting partners such as the police, fire service, and faith representatives. Members were encouraged to suggest additional contributors. In April, the Committee planned to consider the topic of HMOs, with Councillor Tuckwell agreeing to participate.</p> <p>It was confirmed that the Committee would continue to operate in the same way as under Councillor Bridges's chairmanship: external partners or officers would give a brief presentation before the Committee moved directly to questions. Members were expected to read the papers in advance. The questioning format would remain as one question plus an optional follow-up.</p>

	<p>The collaborative work undertaken by the Committee in respect of funfairs and circuses was also recognised by the Chair. It was noted that a deposit scheme was now in place, that had originated from cross-party collaboration within the Residents' Services Select Committee. This demonstrated that, by working together, positive outcomes could be delivered protecting land and ensuring that deposits were taken from those operating said funfairs and circuses.</p> <p>RESOLVED: That the Residents' Services Select Committee considered the Work Programme report and agreed any amendments.</p>
	<p>The meeting, which commenced at 7.00 pm, closed at 9.36 pm.</p>

These are the minutes of the above meeting. For more information on any of the resolutions please contact Liz Penny, Democratic Services Officer on epenny@hillingdon.gov.uk. Circulation of these minutes is to Councillors, officers, the press and members of the public.

Homelessness and Rough Sleeping Strategy Consultation Draft

Committee name	Residents' Services Select Committee
Officer reporting	Debby Weller
Papers with report	Appendix A: Hillingdon Homelessness and Rough Sleeping Strategy 2026 to 2030: Draft for Consultation Appendix B: Homelessness and Rough Sleeping Review 2025
Ward	All

HEADLINES

As part of its statutory responsibility to undertake a Homelessness and Rough Sleeping Review and to develop and publish a Homelessness and Rough Sleeping Strategy, this report provides the Residents' Services Select Committee with an opportunity to review and comment on the draft Strategy before Cabinet considers it.

RECOMMENDATIONS

That the Residents' Services Select Committee:

- 1. Notes the contents of the Homelessness and Rough Sleeping Review; and**
- 2. Reviews the draft Homelessness and Rough Sleeping Strategy for the Borough and comments on any matters it would like considered as this Strategy is finalised for approval by the Cabinet.**

SUPPORTING INFORMATION

Under the Homelessness Act 2022, local housing authorities must publish a comprehensive homelessness and rough sleeping strategy every 5 years based on a review of all forms of homelessness in their area.

The development of the review and the draft strategy (see attached appendices A & B) have included data analysis and engagement with internal and external partners during summer and autumn 2025. They have been informed by current challenges for homelessness at a national and more local level and take into account the Temporary Accommodation Strategy approved by Cabinet in February 2025 and the Residents' Services Select Committee Review of Homelessness and the Customer Journey which concluded in January 2025.

The Strategy is currently undergoing a six-week formal consultation process which began on 5th January 2026 and concludes on 15th February 2026. Following consultation, the consideration by Cabinet is scheduled for 19th March 2026.

The Vision in the draft for Homelessness and Rough Sleeping is:

Putting residents first: a compassionate, preventative and empowering approach to tackling homelessness and rough sleeping, with access to appropriate accommodation and support.

There are five strategic priorities, brief details of which are as follows:

Strategic Priority1: Early and Sustained Prevention of Homelessness

Improve Access to Early and Sustained Prevention of Homelessness	Strengthen Financial and Multi-Agency Support to Prevent Homelessness	Support Tenancy Sustainment and Long-Term Housing Stability
<ul style="list-style-type: none"> • Universal advice • Targeted advice to be expanded for high-risk groups • Tailored response to high volume presentations • Readiness for Renters Rights legislation • Digital tools for self - assessment and tailored advice • Joint working with Children’s Services to improve pathways for care leavers 	<ul style="list-style-type: none"> • Homelessness Prevention Fund • Coordinate wraparound support through range of homelessness partners • Hospital discharge protocol • Prison and probation services strengthened protocol 	<ul style="list-style-type: none"> • Floating support and tenancy management through partners and inhouse services • Employment and financial advice to support long-term stability • Discretionary Housing Payments kept under review to support households at risk • Preparation for Independent Living

Strategic Priority 2: Resident Focused Homelessness Services

Residents are Clear about their Rights and Responsibilities and are Respected, Understood and Supported	Staff are Equipped to Provide Excellent Services	Strengthening Partnerships
<ul style="list-style-type: none"> Residents' Charter to explain homelessness support and set expectations Providing a welcoming environment Efficient appointment systems Quality assurance controls Feedback mechanisms to inform service improvements and promote co-production Strengthening complaints process and learning to improve services Update communication materials to ensure clarity and understanding 	<ul style="list-style-type: none"> Training and development Supervision and Wellbeing - staff supervision and tools and policies to support mental health Learning culture, share good practice and promote continuous improvement Professionalism and consistency – clear service standards and protocols Effective case management with named case workers and active communication Staff voice – involved in service design 	<ul style="list-style-type: none"> Recognise and value contributions Shared protocols and integrated systems Referrals across departments Engage actively with partners Coordinate activities Forward planning work with partners Longer-term commissioning Shared learning and development

Strategic Priority 3: Support Access to Safe, Suitable, Sustainable Accommodation

Increase Access to Safe, Suitable and Sustainable Housing	Reduce Reliance on Emergency Housing	Improve Pathways to Settled Housing
<ul style="list-style-type: none"> Develop homelessness accommodation pipeline Maximise use of council owned assets 	<ul style="list-style-type: none"> Increase supply of temporary and supported housing Continue to develop relationships with private landlords 	<ul style="list-style-type: none"> Secure move-on options through collaboration with providers Promote tenancy sustainment and

<ul style="list-style-type: none"> • Address Homes in Multiple Occupation quality and regulation through licensing and inspections • Maximise use of existing council homes 	<ul style="list-style-type: none"> • Strengthen partnerships with housing associations and larger private sector providers 	<ul style="list-style-type: none"> • support services • Monitor and evaluate transition outcomes to inform future planning
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Strategic Priority 4: Targeted Housing Pathways for Single Homeless, Rough Sleepers and Other Groups

Build Clear and Sustainable Housing Pathways	Strengthen Partnership and Outreach to Address Complex Needs	Promote Recovery, Independence and Long-Term Stability
<ul style="list-style-type: none"> • Robust Pathways to effectively support movement to sustainable accommodation • Pathways for recent arrivals • Increase availability of shared accommodation for under 35s • Targeted supported housing for young people • Safe Temporary Accommodation for survivors of Domestic Abuse • Combined housing and employment advice for those who are benefit capped • Dedicated officer working with hospital discharge teams 	<ul style="list-style-type: none"> • Partnership working with other London Boroughs to address rough sleeping • Collaboration with commissioned and non-commissioned services to help transition away from the streets • Outreach services to be reviewed to ensure remain responsive to evolving needs 	<ul style="list-style-type: none"> • Focus on health and wellbeing and on access to meaningful opportunities in education, training and employment • Tailored support to transition to independent living • Housing first initiatives to provide a solid foundation to address deep rooted challenges

Strategic Priority 5: Modern data led cost effective services

Use Data to Drive Prevention and Early Intervention	Embed Performance, Workforce and Service Quality Monitoring
<ul style="list-style-type: none">• Centralised Homelessness Dashboard – provide real-time visibility of key metrics to support operational oversight, strategic planning and performance management• Predictive analytics to identify households at risk of homelessness earlier• Data modelling to support resource allocation, forecast demand and inform commissioning decisions	<ul style="list-style-type: none">• Benchmarking against other London boroughs and national indicators (outcomes framework)• Monitoring of staff caseloads and wellbeing indicators• Key metrics to include re-approach rates, resolution times and resident satisfaction

BACKGROUND PAPERS

[Residents' Services Select Committee Review of Homelessness and the Customer Journey – Review Findings](#)

APPENDICES

Appendix A Hillingdon Homelessness and Rough Sleeping Strategy 2026 to 2030: Draft for Consultation

Appendix B Homelessness and Rough Sleeping Review 2025

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Appendix A

Hillingdon Homelessness and Rough Sleeping Strategy 2026 to 2030: Draft for Consultation

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HILLINGDON
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Foreword

Homelessness and rough sleeping are among the most urgent and visible challenges facing our communities today and London is at the centre of the homelessness crisis. On 31st March 2025, of the 131 thousand homeless households in England in temporary accommodation, more than half were in London. Spending by councils in England on temporary accommodation reached £2.8 billion in 2024-25, up 25% from the year before.

Outer-London boroughs like Hillingdon, face significant housing needs and a critical shortage of affordable housing. As a port borough and a hub for asylum hotels and recently for Chagosian families, who have a route to British nationality in place, Hillingdon faces additional and unsustainable pressures. The influx of asylum seekers and other new arrivals, places further strain on already limited housing resources and rough sleeping, exacerbating the challenges of providing adequate accommodation and support services. In Hillingdon, we are determined to tackle these issues head-on with

compassion, innovation, and a relentless focus on prevention.

This strategy sets out our vision for a borough where homelessness is rare, brief, and non-recurring. It reflects our commitment to putting residents first—ensuring that every individual who faces or is at risk of homelessness is treated with dignity, empathy, and respect. It also recognises the complex and evolving landscape in which we operate.

Loss of private rented sector lettings is the most frequent reason for approaches to the council regarding homelessness and by far the most common reason for households becoming homeless and needing to be housed in temporary accommodation. Other key reasons for homelessness approaches are no longer being able to stay with family and friends and movement out of Home Office accommodation. Our services are being shaped to respond appropriately. We are also aware that the causes of homelessness are varied and often deeply rooted. That is why this strategy prioritises early intervention, tailored support, and strong partnerships across council services, voluntary organisations, health providers, and the

wider community. It builds on the progress we have made through initiatives such as the development of housing pathways for rough sleepers and advances made in delivering our Temporary Accommodation Reduction Strategy and our plan to reduce the budgetary impact of homelessness and adverse impacts on the lives of those affected. To reduce the use and unsustainable cost of temporary accommodation, workstreams are focused on increasing early intervention and preventions and on increasing the supply of both temporary and settled accommodation for homeless residents in the private rented and social sectors

The private rented sector is the main source of housing for homeless households. The private rented market is changing and to avoid costly nightly paid accommodation we need to review our offer and incentives to attract the larger and institutional parties who will provide stability and longer term housing options.

We are building on our existing relationships with private sector landlords and are actively seeking new partners to increase the availability of private rented accommodation for homeless residents,

Hillingdon Homelessness and Rough Sleeping Strategy 2026 to 2030: Draft for Consultation including longer-term leasing arrangements for groups of properties.

We are exploring alternative options for direct housing provision by the council through existing arrangements and/or new company structures.

We are proud of the work already underway—from securing new funding and

expanding supported housing, to strengthening our services through staff development. We are expanding the supply of council homes through acquisitions, development and regeneration and are working with Housing Associations to encourage further development. We make best use of existing homes through initiatives to reduce under-occupation and

to tackle housing fraud. We recognise that there is much more to do. This strategy sets out a clear roadmap for the next five years, with goals and measurable outcomes to guide our efforts.

Councillor Steve Tuckwell

Cabinet Member for Planning, Housing and Growth

Introduction

The Hillingdon Homelessness and Rough Sleeping Strategy 2026-2031 sets out how we will work to prevent and relieve homelessness and remove the need to sleep rough. It outlines five strategic priorities which will direct the work of the council and inform our work with partners over the next five years.

Our Strategic Priorities

Priority One: Early and sustained prevention of homelessness

Priority Two: Resident focussed homelessness services

Priority Three: Support access to safe, suitable and sustainable accommodation

Priority Four: Targeted housing pathways for single homeless, rough sleepers and other groups

Priority Five: Modern, data-led and cost-effective services

The strategy has been produced after engagement with a range of local stakeholders and it is informed by best practice and the wider policy and legislative environment.

We have completed a comprehensive homelessness review which evidences the extent of the challenges faced by Hillingdon in relation to homelessness and rough sleeping and identifies key trends and challenges. Key findings are covered under 'What we know about Homelessness in Hillingdon' below.

Our Vision for Homelessness and Rough Sleeping

Putting residents first: a compassionate, preventative and empowering approach to tackling homelessness and rough sleeping, with access to appropriate accommodation and support

We envision a borough where homelessness is rare, brief, and non-recurring. Our commitment is to put

residents first, ensuring that every individual facing or at risk of homelessness is treated with respect, dignity, and empathy.

We will prioritise prevention, intervening early to stop homelessness before it starts, and we will support people to help themselves, building resilience and independence through tailored support and opportunities. We recognise that appropriate accommodation and support are fundamental to achieving lasting solutions and enabling people to rebuild their lives.

We will deliver this vision through:

- **Respectful, person-centred and trauma informed services** that listen to and involve residents in shaping their own solutions.
- **Early intervention and prevention** strategies that tackle the root causes of homelessness.
- **Provision of safe, suitable, and sustainable accommodation**, matched with the right level of support to meet individual needs.

- **Sound financial management**, ensuring that resources are used effectively and sustainably to maximise impact.
- **Empowerment and partnership**, helping residents build the skills, confidence, and connections they need to thrive.
- **Collaborative working** across council departments, voluntary sector partners, and communities to create a joined-up response.



Context

Major Shifts Since the 2019 Strategy

COVID-19 Disruption: The pandemic reshaped service delivery, accelerating digital transformation and remote working. Unlike many councils, Hillingdon maintained face-to-face support for homeless individuals, preserving continuity of care.

‘Everyone In’ & Rough Sleeping Pathway:

The national initiative led to 160 rough sleepers being housed from Heathrow. Olympic House was leased as a 33-bed first-stage accommodation and multi-service hub. This marked a turning point in Hillingdon’s rough sleeping response.

Funding Landscape: The Rough Sleeper Initiative (RSI) enabled multi-agency partnership development. Additional funding from public health and accommodation grants expanded capacity, especially for substance misuse and wraparound support.

National Homelessness Challenges

- High levels of homelessness and households housed in temporary accommodation.
- The cost of temporary accommodation reaching crisis levels with local authorities less and less able to spend funding on homelessness prevention.
- Increasing numbers of households with children in B&B with shared facilities and the number that have been there for more than the six-week statutory limit.
- Placements made a long distance from communities, schools, work, families and friends.
- Rents growing far faster than benefit levels.
- The impact of providing asylum accommodation on the ability to tackle homelessness.
- Insufficient oversight of supported housing with some providing sub-standard housing with little support, supervision or care.
- There are concerns that welfare reforms could increase poverty and the risk of homelessness.

Evictions from private sector housing are the most common reason for homelessness approaches to local authorities.

Housing Market Dynamics & Affordability Challenges

Private Rented Sector (PRS) Pressures: Hillingdon’s average rent rose to £1,423 in 2024/25 — 12% higher than the previous year and £429 above the England average.

Despite being relatively affordable within London (ranked 28th of 33 boroughs), affordability remains a major barrier for low-income households.

Local Housing Allowance (LHA): Re-pegged to the 30th percentile in 2024, but not updated in 2025, creating a widening gap between LHA and actual rents.

Council data shows significant shortfalls in properties available at LHA rates, especially for larger households (e.g., £788 gap for 4-bed homes).

Structural Market Changes:

Small landlords are exiting the market rapidly — 290,000 PRS homes sold (2021–

Hillingdon Homelessness and Rough Sleeping Strategy 2026 to 2030: Draft for Consultation 2024), while only 130,000 new Build to Rent homes were delivered.

London PRS listings have dropped 41% since 2017, with larger homes hardest hit. Only 5% of listings were affordable to LHA recipients in mid-2024.

The PRS is evolving with professional and institutional investors stepping in. These buyers are well-capitalised, often operating with lower levels of debt and are focused on sustainability, operational efficiency and long-term capital appreciation rather than short term yields. Demand for rental housing continues to outstrip supply, supporting rental growth and underpinning long-term investment.

Legal and Policy Developments

Key Case Law:

Croydon v Imam: Financial constraints do not excuse councils from statutory duties.

Hajjaj v Westminster: Suitability assessments must be evidence-based.

Ciftci v Haringey: Reinforced procedural rigour in intentional homelessness decisions.

Renters' Rights Act

A major reform aimed at improving security and fairness for tenants in the private rented sector.

It will abolish Section 21 'no fault' evictions, meaning landlords must provide legitimate reasons—such as rent arrears or needing to sell the property—to end a tenancy. The Act introduces rolling periodic tenancies, strengthens protections against retaliatory evictions, and enhances tenant rights, including the ability to request pets and challenge poor housing conditions.

It also establishes a Private Rented Sector Database and Landlord Ombudsman, applies the Decent Homes Standard to private rentals, and bans discrimination against tenants on benefits or with children.

These changes aim to reduce homelessness risk by making tenancies more secure and improving housing standards although landlord withdrawal and court delays may offset benefits.

The Act may well continue to impact on supply and procurement as more landlords leave the market, particularly those with small portfolios. There may other consequences as landlords become

increasingly selective about tenants and seek alternative eviction routes.

Ending of private rented sector evictions is a major cause of homelessness. It accounted for the highest number of approaches to Hillingdon's Homelessness services in 2024/25 and by far the highest number of bookings into temporary accommodation.

Although the Renters' Rights Act is intended to protect tenants there are considerable risks. Without court reform many landlords believe they will be left stranded if tenants stop paying rent. If possession becomes too slow or uncertain more landlords may simply exit the market leaving fewer homes and upward pressure on rents.

Supported Housing Oversight (SHROA 2023):

The Act aims to raise standards in a part of the housing system perceived to lack oversight. It introduces licensing and national standards for supported housing providers, motivated by concerns that exemptions from housing benefit subsidy caps were being exploited by some providers.

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Councils must conduct needs assessments and develop supported housing strategies, improving regulation and quality assurance.

The intent of the legislation is supported but there remains a lot of uncertainty regarding the impact of the legislation. Many people at risk of homelessness have support needs and over the past six years the share of households owed a duty with at least one identified support need has steadily increased across the country from 45% in 2019 to 58% in early 2025.¹

Cross-government Homelessness and Rough Sleeping Strategy published 11 December 2025 with a focus on prevention and long-term planning. Implications for Hillingdon's Homelessness and Rough Sleeping Strategy will be further considered during the consultation period.

Government Housing Strategy expected 2025/26.

Repeal of the Vagrancy Act (1824) to decriminalise rough sleeping.

Allocation of Social Housing Regulations

2025: have exempted domestic abuse survivors and care leavers under 25 from local connection tests.

Fair Funding Review 2.0 to include separating temporary accommodation funding from Homelessness Prevention Grant, creating ring-fenced preventions stream.

Mayor of London's Rough Sleeping Plan (2025–2030)

Aims to eliminate rough sleeping by 2030 through prevention, early intervention, and sustainable housing pathways.

Key initiatives: Ending Homelessness Hubs, prevention phoneline, outreach expansion, and refurbishment of 500 social homes via 'Homes Off the Streets'.

Government Investment Commitments:

£100m for homelessness prevention.

£950m for Local Authority Housing Fund (Round 4) to reduce reliance on B&Bs and hotels.

£39bn Social and Affordable Homes Programme (2025–2035), with 60% for social rent. London receives 30% of funding despite having 56% of TA households.

Demand Pressures & Vulnerable Groups

Asylum Seekers: Applications nationally surged to 109,000 in 2025.

Hotel placements in the borough have increased local demand on homelessness services.

Policy changes (e.g., pause on refugee family reunion) may lessen future strain on services to some extent, but new arrivals are a considerable pressure on homelessness resources.

¹ Ministry of Housing, Communities and Local Government, 'Statutory homelessness England level time series "live tables"', GOV.UK, 22 July

2025, www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness

Policy Landscape

Housing Supply Constraints

Delivery Challenges: Only 3,991 affordable homes started in London last year — second-lowest on record.

Viability issues due to land costs, interest rates, build cost inflation, and fire safety regulations (e.g., second staircase requirement).

Provider Pressures: Housing associations are scaling back development to focus on existing stock.

Retrofitting for fire safety, damp, and mould is diverting resources from new builds.

For-Profit Registered Providers (FPRPs):

Rapid growth expected — current 43,100 homes projected to triple by 2030.

May help fill gaps left by traditional providers, especially for social rent.

Technology and Homelessness Services

AI & Digital Tools: Potential to identify homelessness risk factors, coordinate support, and match services to needs.

Risks include misinformation, bias, and undermining person-centred approaches.

Digital Exclusion: A growing barrier for those in TA or on low incomes. Limited access to secure connectivity affects ability to manage benefits, health appointments, and engage with support services.

Landlord Practices: Increased use of digital tenant screening tools (e.g., risk profiling algorithms).

May disadvantage benefit recipients, those in non-standard employment, or with limited digital literacy.

A multi-year settlement is expected from 26/27. The formula for distributing the Homelessness Prevention Grant is being reformed and will shift the focus towards prevention. It is likely that the RSP&RG will become part of the HPG. The funding will be split into two components – Temporary Accommodation demand and costs and Prevention and Relief demand and costs. The existing split of 49% for prevention/relief and 51% for TA will shift to a greater proportion for prevention/relief. The TA element may be consolidated into the Local Government Finance Settlement.

Ending rough sleeping in London

In May 2025 the Mayor launched his new plan of action on rough sleeping, promising to break the ‘vicious cycle’ of street homelessness and to put London on a pathway to end rough sleeping for good by 2030. The Plan is framed around three key steps to achieve this ambition.

- Provide leadership to join together services and make sure people can get the help they need, as early and as simply as possible.
- Prevent rough sleeping wherever possible.
- Deliver rapid, sustainable routes away from the streets

What we know about homelessness in Hillingdon

There are roughly 109 thousand households in Hillingdon. During April 2024 to March 2025, 7306 contacted the council because they were either already homeless or they were threatened with homelessness. This number has more than doubled over a 3 year period and is likely to increase again in the current year.

Three reasons account for 58% of all approaches:

- Family and friend evictions
- Evictions from private rented sector housing
- Ending of Home Office accommodation

A homelessness prevention or relief duty was accepted for 2053 households, around a third for prevention of homelessness and the other two thirds for relief when the resident had already become homeless.

Nightly paid temporary accommodation

The number of households booked into nightly paid temporary accommodation during 2024/25 was 740.

- 208 with a 1 bedroom need,
- 269 with a 2 bedroom need,
- 198 with a 3 bedroom need, and
- 69 with a 4 bedroom need

Private sector evictions are by far the most common reason, accounting for 42% of these bookings, and three quarters of those are for families with children. Of all 3 bedroom bookings, 58% are due to private sector evictions and this rises further to 82% for 4 bedroom bookings. Other prominent reasons for nightly paid temporary accommodation bookings are domestic abuse, ending of Home Office accommodation and friends and family evictions.

The number of homeless households in temporary accommodation on 1 April 2025

was 1,562 of which 796 were in nightly paid accommodation.

The cost of providing temporary accommodation has increased markedly in Hillingdon as it has in local authorities across the country. Councils in England spent £2.8bn on temporary accommodation in 2024/25 – an increase of 25 per cent in just 12 months.² Reducing the number of residents placed in and the cost of nightly paid temporary accommodation is an imperative for the borough.

Declining availability in the private rented sector

Since our last homelessness strategy, housing affordability has worsened, private renting is more expensive and the gap between rents and the amount of benefit that can be claimed to cover housing costs has grown.

Small, individual landlords are leaving the housing market at an accelerated pace driven by rising costs, tax changes, ageing landlord demographics and forthcoming legislative changes under the Renters'

²[Local authority revenue expenditure and financing England 2024 to 2025](#)

Rights Act. A study by Savills and the London School of Economics³ found that the availability of private rented homes had dropped by 41%, with the steepest decline in larger properties. The contraction is most severe in the more affordable areas - Hillingdon is one of the most affordable London boroughs ranking 28th out of 33 boroughs.

If the private rented sector continues to shrink, the pressure on social housing, already severe, will continue to grow. However, not all types of landlords are in decline. Corporate landlords and institutional investors benefit from economies of scale, streamlined management, and lower financing costs, making them more resilient to economic and legislative pressures.

New arrivals from overseas

There has been a significant increase in the number of people claiming asylum and action to speed up applications and reduce use of hotels has meant additional pressures for homelessness services.

³ [Supply of Private Rented Sector Accommodation in London](#)

There has been higher migration for humanitarian reasons via bespoke schemes such as those for Ukrainians and Afghans. Chagossian families, that have a right under the Nationality and Borders Act 2022 to apply to be registered as British citizens have been arriving following the agreement that Diego Garcia will no longer remain a British Indian Ocean Territory.

Rough sleeping in Hillingdon

Hillingdon has a high number of rough sleepers compared to other London boroughs. During 2024/25 there were 793 CHAIN⁴ verified rough sleepers – 301 at Heathrow airport and 492 in the rest of the borough. The number at the airport is similar to the previous year, but the number in the rest of the borough increased by 66%.

- 315 rough sleepers had a mental health support need,
- 145 had an alcohol related support need,
- 155 had a drugs related support need, and
- 217 had more than one of these needs.

⁴ CHAIN (Combined Homelessness and Information Network) is a multi-agency database recording

- 17 were previously in the armed forces
- 86 had been in prison
- 21 had been in care

We have a growing cohort of people facing homelessness and rough sleeping after being moved on from Home Office accommodation. An increasing number are becoming street homeless as the council struggles to meet statutory obligations amid funding shortfalls and rising demand.

Temporary Accommodation Reduction

Hillingdon Council already has in place a strategy to reduce temporary accommodation. The associated Delivery Plan has four workstreams:

- Increase prevention and reduce new temporary accommodation placements
- Increase access to alternative housing options
- Reduce cost of temporary accommodation
- Increase move-on into social housing

information about people sleeping rough and the wider street population in London.

Review of Housing advice and Homelessness Service

- The Council's Cabinet has approved taking forward recommendations made by the Residents' Services Select Committee Review into the Council's Housing Advice and Homelessness Service. Recommendations are made in the following areas:
 - Enhancing Resident Experience
 - Managing expectations and process efficiency
 - Staff support & training
 - Partnerships & collaboration

Stakeholder engagement – Emerging themes

Engagement with internal and external colleagues and partners in developing this consultation draft has been carried out. The following themes have been highlighted in these discussions:

- Prioritising prevention at an early stage.
- Integration of employment support with housing services.

- Addressing needs of some specific groups – including households: with an autistic member; under age 35; that are benefit capped, ex-offenders, that have no recourse to public funds, and victims of domestic abuse.
- Improved partnering including planning and coordination of services, data sharing and referral pathways.
- More joint training, protocols and communication channels with internal and external partners.
- Engagement wider range of voluntary and faith based organisations
- Ensure that residents are provided with information to enable them to make an informed choice about realistic, sustainable options. Unaffordable housing, especially for single adults combines with a reluctance to consider other locations.
- Capture learning from complaints and reviews.
- Structured approach to gathering resident feedback
- Framework to promote staff wellbeing and prevent burnout
- Increase accommodation options for both temporary and permanent housing across tenures. To include longer term leasing options. planned acquisitions and development
- Address concerns around the quality of accommodation and anti-social behaviour.
- Develop an engagement plan to build relationships with corporate landlords. Address concerns regarding S21 changes causing landlords to exit the market.
- Coordinate work to identify HMO landlords early and to work with them.
- Address concerns regarding increased numbers of predominantly single male asylum seekers and fairness of the particular pressure on Hillingdon.
- Lack of resources for non-priority need homelessness groups is impacting on rough sleeping.
- Need for mental health outreach services

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- Consider how a Housing First model could work in Hillingdon.
- Focus on service delivery to ensure professionalism, consistency and efficiency. Better collaboration between teams. Clear plans and guidelines. Clear governance and decision making structures.
- Need for a quality control and performance management culture.
- Develop existing work to enhance data capabilities and allow for access to data on demand. Explore opportunities for use of AI in service delivery.

The data gathered during our Homelessness Review, existing plans and

the feedback from internal and external colleagues and partners has helped to inform our proposed priorities and goals.

More detailed action plans to deliver the Homelessness Strategy will be prepared on an annual basis.

Key Stats



305,900

Population in Hillingdon increased by 7.5% from 273,900 in 2011 to 305,900 in 2021. This compares to a London average of 7.7% and England average of 6.6%.



23.4%

Households with a couple and dependent children rose from 22.2% in 2011 to 23.4% in 2021. Lone parent households fell slightly from 12.8% to 12.7%.



33.3%

In 2021, 33.3% of residents identified as Asian; 48.2% White; 7.8% Black; 6.3% Other.



25.9%

Hillingdon saw a rise in privately rented homes from 18.1% in 2011 to 25.9% in 2021.



14.4%

In 2021, 14.4% identified as Muslim; 39% Christian; 19.4% no religion; 10.8% Hindu; 8.6% Sikh.



£481,197

Average house price in Hillingdon rose 38% from £347,828 in 2015 to £481,197 in 2025.



3,226

In April 2025, there were 3,226 households on the housing register.



129%

Homeless approaches increased by 129% from 3,198 in 2021/22 to 7,306 in 2024/25.



1,537

Households in temporary accommodation rose from 485 in 2020 to 1,537 in 2024.



0

Zero households with dependent children in non-self-contained B&Bs at end of March 2025.



96%

New social lettings increased by 96% from 290 in 2020/21 to 569 in 2023/24.



£1,526

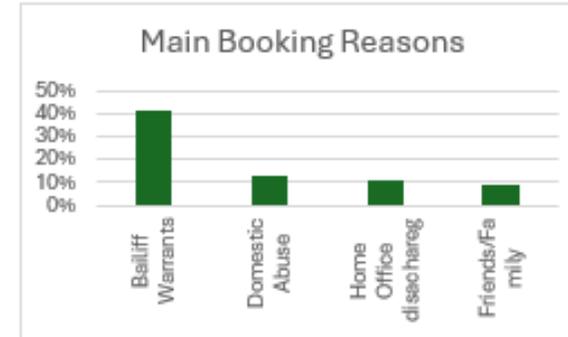
Average monthly private rent in Hillingdon was £1,526 in May 2025.



On 1 April 2025 there were 1,562 households in temporary accommodation (TA), an increase of 36% compared to the previous year. Of these 796 were in nightly paid



Bookings into nightly paid accommodation between April 2025 and March 2026 totalled 740. This is 8% more than the previous year.

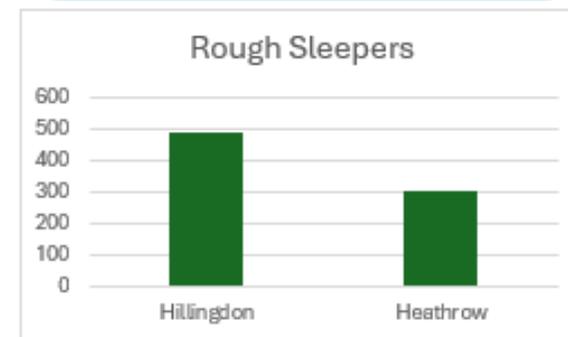
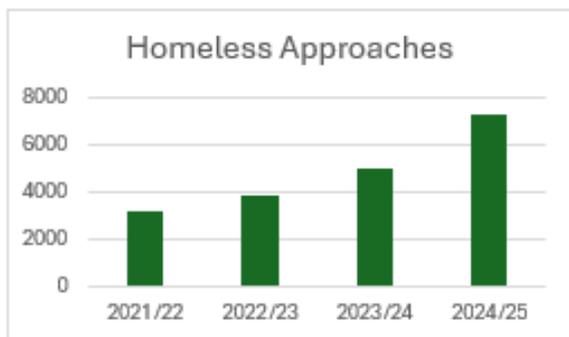


Bailiff warrants for private sector evictions are by far the most prominent reason for bookings into nightly paid accommodation

Homeless Approaches have seen a steady increase for the past four years and there is an expectation it will continue to rise in 2025/26

3,194 households on Hillingdon Housing Register 895 of those registered were homeless households (29% 1 bed need, 34% 2 bed, 26% 3 bed & 11% 4 bed or more).

CHAIN data for rough sleepers shows a total of 793 individuals were recorded as sleeping rough in Hillingdon between 1 April 2024 and 31 March 2025



Strategic Priority 1: Early and sustained prevention of homelessness

The best way to reduce
homelessness is to prevent it
happening in the first place.

Hillingdon's approach to
homelessness is rooted in early
intervention, targeted support,
and sustained tenancy
outcomes.

We provide signposting information on our website for residents in housing need who are able to self-help and also provide residents with tailored advice and information to empower them to make informed decisions about their housing options.

We aim in particular to target upstream preventative measures to achieve most impact. This includes prevention activity designed to address the main causes of

homelessness and to address the needs of particular groups of residents.

Private rented sector evictions are by far the most frequent reason for households in Hillingdon to become homeless and require temporary accommodation. We want to make sure all avenues to relieve the threat of homelessness are available as soon as our service becomes aware of the threat. This can include working with the current landlord, investigating benefit issues, and helping to locate alternative accommodation. We will track success in preventing homelessness for this reason through the numbers of prevention versus the number of relief duties and how those duties are ended.

The changes being brought forward by the Renters' Rights Act will have significant impacts for Housing Advice and Homelessness Officers. The nature of approaches is likely to change. Without the availability of Section 21 evictions use of other grounds will become more likely and there may also be an increase in illegal evictions.

Current Service Provision

- The Homelessness Team works collaboratively with applicants, their support networks—including family and friends—and landlords to offer guidance and assistance aimed at preventing homelessness and maintaining tenancies where appropriate.
- We work in close partnership with hospital discharge teams to ensure appropriate support is in place for individuals transitioning from hospital into the community.
- We work in close partnership with relevant agencies to prevent and address domestic abuse. This includes funding the Sanctuary Scheme, which enables victims to remain safely in their own homes. Additionally, we are actively progressing towards achieving Domestic Abuse Housing Alliance (DAHA) accreditation
- Housing staff actively participate in a range of multi-agency forums, including the Multi-Agency Risk Assessment Conference (MARAC), which coordinates risk management strategies for victims and survivors identified as being at the highest risk of harm due to domestic abuse.

- The Housing Protocol for Care Leavers has been updated and includes direct offers of accommodation as well the implementation of a panel to determine best course of action.
- Hillingdon has established a Single Homelessness and Rough Sleepers Group that includes Public Health, CNWL NHS Trust, ARCH, social care colleagues and other partners. This multi-agency forum coordinates responses to complex cases and ensures wraparound support.
- We successfully secured funding for the Accommodation for Ex-Offenders (AfEO) scheme. Through this programme, we work collaboratively with partners to support individuals with offending histories who are at risk of homelessness, helping them access suitable accommodation with a strong focus on tenancy sustainment.

Universal Advice – Targeted Advice

Hillingdon’s homelessness services provide both universal and targeted advice. Universal advice is delivered through the Housing Needs and Homelessness Service, including triage, reception, and online resources. However, targeted advice

is increasingly prioritised for high-risk groups such as care leavers, asylum seekers, victims of domestic abuse, and those with complex support needs. The P3 service for young people and the tailored Personal Housing Plans are examples of targeted interventions. The Council is exploring digital tools to help residents self-assess eligibility and receive tailored guidance earlier in their journey.

Homeless Prevention Fund

A dedicated Homeless Prevention Fund is being reviewed to support upstream interventions. This includes financial incentives to retain tenancies, prevent family evictions, and support “Find Your Own” schemes. The fund will be used flexibly to reduce new placements into temporary accommodation and support sustainable housing outcomes. Staff are encouraged to use the fund proactively, and a consistent framework is being developed to ensure equitable access and impact tracking.

Joint Working with Social Care – Pipeline for Care Leavers

Joint working with Children’s Services is being strengthened to improve housing

pathways for care leavers. The review highlights the need for clearer protocols, better communication, and earlier planning. The Council is working to embed housing officers within social care teams and develop a shared pipeline of supported and general needs accommodation. Partnerships with P3 and YMCA are key components of this pathway, offering tailored support and transitional housing.

Links with Social Care, Health Services, and Public Health

Hillingdon has established a Single Homelessness and Rough Sleepers Group that includes Public Health, CNWL NHS Trust, ARCH, and social care colleagues. This multi-agency forum coordinates responses to complex cases and ensures wraparound support. Public Health leads on the Rough Sleeping Drug and Alcohol Treatment Grant, and a Hospital Discharge Officer has been appointed to improve transitions from hospital to housing. The Council is also working to align with national safeguarding guidance and improve data sharing across services.

Sustaining Tenancies – Support

Tenancy sustainment is a core focus of the strategy, particularly for households in temporary accommodation and those rehoused via PRS or social housing. Support includes floating support services (e.g. P3), tenancy support, and integration with employment and financial advice. The Council constantly reviews its Discretionary Housing Payment process to better support households at risk of arrears and subsequent eviction. Trinity's shared housing model and YMCA's keywork system are examples of tenancy sustainment in action helping prepare for longer term solutions.

Hospitals – Protocols

Protocols are being developed to improve hospital discharge processes. A dedicated Hospital Discharge Officer is now in post, working with Hillingdon Hospital and CNWL to ensure timely and appropriate housing solutions. The aim is to prevent discharge into homelessness and reduce repeat admissions. The Council is exploring joint training and referral pathways with health services to embed housing considerations into discharge planning.

Prison / Probation – Protocols

We will be looking at stronger protocols with probation and prison services. A significant number of rough sleepers have a history of custody, and ex-offenders face barriers in accessing housing. The Council is working to improve referral pathways, engage landlords, and develop supported housing options. Trinity and Olympic House provide accommodation for ex-offenders, and the Council is exploring Housing First models for those with multiple support needs.

Asylum seekers – early work in the hotels

Hillingdon has the highest concentration of asylum seekers in contingency hotel accommodation in London. A specialist asylum team works with NASS applicants before and after status decisions to prevent homelessness. Early engagement includes housing advice, reconnection planning, and coordination with Heathrow Travel Care. The Council is advocating for fairer funding and national dispersal to reduce local pressures. Rough sleeping among asylum seekers is rising, and targeted outreach is being expanded.

Strategic Priority 1: Early and sustained prevention of homelessness – Our Goals

Improve Access to Early Advice and Intervention

- **Universal advice:** We will deliver universal advice through triage, reception, and online resources.
- **Targeted advice:** This will be expanded for high-risk groups including care leavers, asylum seekers, victims of domestic abuse, and those with complex needs.
- **Tailored response to high volume presentations:** We will focus on ensuring effective and consistent responses where homelessness is related to PRS evictions, family or friend evictions or other prominent reasons for homelessness.
- **Readiness for Renters Rights legislation:** Preparation for the Act's implementation will include developing our understanding of the likely impacts and available tools. Staff will receive comprehensive training and work will be

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cross service to coordinate the work of Homelessness Prevention with Private Sector Enforcement.

- **Digital tools:** Enhancements will enable residents to self-assess and to receive tailored guidance earlier.
- **Joint working with Children's Services:** We will strengthen our working arrangements to improve housing pathways for care leavers, including linking housing officers with colleagues in Children's Services and developing shared accommodation pipelines.

Strengthen Financial and Multi-Agency Support to Prevent Homelessness

- **Homelessness Prevention Fund:** We will review and promote proactive use of the Homeless Prevention Fund to retain tenancies and prevent family evictions.
- **Coordinate wraparound support:** through the Single Homelessness and Rough Sleepers Group, involving Public Health, CNWL NHS Trust, ARCH, and social care.
- **Hospital discharge protocols:** Housing considerations will be embedded into

protocols, supported by a dedicated Hospital Discharge Officer.

- **Prison and probation services:** We will develop stronger protocols with prison and probation services to support ex-offenders into housing.

Support Tenancy Sustainment and Long-Term Housing Stability

- **Floating support:** We will continue to provide floating support and tenancy management services through partners such as P3 and YMCA and our own inhouse services.
- **Employment and financial advice:** We will engage employment support and financial support with housing services to promote long-term stability.
- **Discretionary Housing Payments:** The process for making discretionary housing payments will be kept under review to better support households at risk.
- **Preparation for independent living:** We will promote innovative models such as Trinity's shared housing coaching and YMCA's keyworker system to prepare residents for independent living.

Outcomes for residents

- Improved Access to Early Advice and Intervention
- Strengthened Financial and Multi-Agency Support
- Enhanced Tenancy Sustainment and Long-Term Stability

Measuring Success

- Publication of a supported housing needs assessment and strategy
- Establishment of a Homelessness Forum to support coordinated and effective partnership working
- Achievement of Domestic Abuse Housing Alliance (DAHA) accreditation
- Increasing the proportion of cases addressed at the prevention stage rather than at the relief stage
- Proportion of prevention and relief cases resulting in a successful outcome
- Increased move-on for individuals to independent living

Strategic Priority 2: Resident focused homelessness services

We are committed to delivering homelessness services that are compassionate, empowering and responsive to the needs of our residents.

We believe that everyone deserves to be treated with dignity, to understand their rights and responsibilities, and to receive high quality support from well trained staff.

Hillingdon Council has adopted the following set of values to guide how we engage with our communities, our residents and each other.

Respect: Collaboration: Efficient: Integrity: Open and honest.

We will work to make sure that our staff working with homeless people and those threatened with homelessness embody these values.

Current service provision

Our Residents' Services Select Committee has undertaken a review of our Housing Advice and Homelessness Service. The primary aims were to identify ways to improve the experience of those presenting as homeless, better manage their expectations, enhance satisfaction, streamline processes and ultimately provide improved support to prevent homelessness. Key findings from the review included:

- The importance of prevention and early intervention in addressing homelessness.
- The need for improved communication and empathy from housing officers.
- The necessity for better systems and technology for case handovers.
- The challenges faced by victims of domestic abuse in accessing housing support.

This strategy will take forward the recommendations from the review which cover:

- Enhancing Resident Experience
- Managing Expectations and Process Efficiency
- Staff Support & Training
- Partnerships and Collaboration

Equalities and diversity

We are committed to promoting equality of opportunity, celebrating and valuing diversity, eliminating unlawful discrimination, harassment and victimisation, and promoting good relations.

Complaints

Our Corporate complaints policy and procedure enables complaints to be made quickly and easily 24 hours a day, seven days a week.

Complaints reports analyse complaints received across the council. It is however our intention to have a stronger framework in place, within homelessness services to ensure that learning from complaints and translating that learning into service improvements is part of our standard practice.

Priority 2: Resident focussed homelessness Services – Our Goals

Residents are clear about their rights and responsibilities and are respected, understood and supported

We will ensure that every resident who engages with our homelessness services feels heard, valued and informed. This means:

- **Residents' Charter:** We will develop a clear, accessible guide explaining each stage of the homelessness support process. This will set expectations, reduce confusion and address common questions.
- **Welcoming Environment:** We will reconfigure the Housing Reception to be more empathetic and welcoming.
- **Efficient Appointments:** We will improve appointment systems by exploring automated text reminders and a self-check-in system at reception. These changes are intended to reduce missed appointments and improve flow through the service.

- **Quality assurance:** We will adopt quality control standards and procedures to continuously monitor service delivery.
- **Feedback Mechanisms:** We will gather resident feedback on an ongoing basis to inform service improvements and we will promote co-production opportunities.
- **Complaints:** We will strengthen our complaints process, ensuring residents know how to raise concerns and that we have mechanisms to learn from complaints and reviews to improve services.
- **Document Review:** We will continue to update resident facing materials to ensure clarity and understanding.

Staff are equipped to provide excellent services

We will invest in our workforce to ensure that they are confident, capable and supported to deliver high- quality, person-centred and trauma informed services. This includes:

- **Training and Development:** We will deliver joint training with partners, including trauma informed approaches, safeguarding and legal duties.

- **Supervision and Wellbeing:** All staff will receive regular casework supervision and will have access to tools and policies that support mental health and burnout.
- **Learning Culture:** We will create a learning environment to share good practice and promote continuous improvement.
- **Professionalism and Consistency:** We will embed clear service standards, protocols and guidelines to ensure consistent delivery.
- **Effective Case Management:** We aim to make sure that every homeless applicant will have a named case worker. We will actively communicate to provide advice and assistance throughout.
- **Staff Voice:** We will actively promote staff involvement in service design. This will include creating a forum for staff to participate and encouraging use of the suggestion box system for ideas to improve service efficiency and resident experience.

Strengthening Partnerships

We recognise that homelessness cannot be tackled in isolation. Our partners play a vital

role in supporting residents and delivering joined-up services. We are committed to strengthening these relationships through meaningful engagement, shared planning and clear coordination. We will:

- **Recognise and Value Contributions:** Acknowledge the expertise, resources, and commitment that partners bring to supporting residents, and celebrate collaborative successes.
- **Shared protocols and integrated systems:** We will ensure working processes are in place across partners to ensure timely and appropriate support for residents, reducing duplication and improving outcomes.
- **Referrals across departments:** A streamlined referral system will be implemented to improve coordination between housing, children's services, adult social care, public health, and voluntary sector partners.
- **Engage Actively:** Facilitate regular meetings, forums, and joint planning sessions with internal and external partners to share updates, align priorities, and build trust.
- **Coordinate Activities:** Improve planning and coordination of services to reduce

duplication, close gaps, and ensure residents receive timely, holistic support.

- **Forward Planning:** Work with partners to anticipate future challenges, plan strategically, and respond proactively to emerging needs.
- **Longer-Term Commissioning:** Where possible, we will move toward longer-term contracts with voluntary and community sector partners, underpinned by clear outcomes, performance indicators, and robust monitoring arrangements. This will support service continuity, innovation, and stronger relationships.
- **Shared Learning and Development:** Promote joint training, peer learning, and shared resources to build capacity and consistency across organisations.

Outcomes for residents

- Residents feel respected, heard, understood and supported throughout their homelessness journey leading to higher satisfaction with the service and staff interactions.
- Residents understand their rights, responsibilities and what to expect at each stage and they receive timely

updates and reminders reducing missed appointments and delays.

- Improved support for complex needs including mental health and substance misuse.
- Services are inclusive and accessible. Residents with language barriers or additional needs can access services equitably and residents are able to provide feedback on services received.
- Residents are supported by well-trained empathetic staff and benefit from coordinated support across council and partner services.
- Residents build resilience and independence

Measuring Success

We will monitor progress through:

- A "One Council" approach to cross-departmental collaboration
- Resident satisfaction and feedback mechanisms
- Staff training uptake
- Joint training manuals developed and disseminated across housing and social care
- Staff satisfaction and wellbeing surveys
- Quality assurance and case audit outcomes

- Regularly updated Personal Housing Plans
- Improved referral and partnership data
- Reduction in complaints and improved resolution times
- Positive outcomes in homelessness prevention and sustained tenancies
- Delivery against commissioned service outcomes and KPIs

**Strategic Priority 3:
Support access to safe,
suitable, sustainable
accommodation**
**Vastly increasing the supply
of settled accommodation
available for homeless
households is imperative to
reduce the number of
households currently living in
nightly paid temporary
accommodation.**

London is at the centre of a homelessness crisis with high levels of homelessness demand and supply pressures in both social and private rented sectors, record numbers of homeless households are in temporary accommodation,

more than half of them in London.

Private Rented Sector Pressures

Incremental reform of the private rented sector has led to significant churn, with small-scale landlords exiting the market and rental stock becoming increasingly concentrated among professional landlords with larger portfolios.

These landlords are more likely to offer settled, good quality homes, but are current incentives are not structured to attract long term landlords and investors.

In London, private rented sector availability has dropped by 41% since 2017, with the steepest decline in larger properties.

Demand for private sector housing remains high. During 2024/25, Hillingdon’s average rent reached £1,423 – a 12% increase year on year.

The gap between average rents and the amount that can be covered by benefits ranged from an average £223 for 1 bedroom property to an average £788 for a 4 bedroom property in mid-2024

Temporary Accommodation Pressures

In Hillingdon, there are in the region of 1,500 households in temporary accommodation. Over time the proportion of insecure nightly paid accommodation has increased and now makes up more than half of temporary accommodation used.

We do not have any households with children in non- self-contained temporary accommodation and are committed to maintaining this.

Temporary accommodation can have wide-ranging negative impacts for those living in it, including worse outcomes for health, education and employment. It is also an unsustainable cost pressure for the council.

Our Temporary Accommodation Strategy includes measures aimed at increasing prevention activity and keeping the cost of temporary accommodation secured as low as possible.

We are transitioning our temporary accommodation supply towards that which is council owned or leased over a longer

period to bring greater stability and reduce costs.

The strategy also needs to address the shortage of supply of homes to meet housing demand.

Homelessness Accommodation Demand

The number of homeless families needing to be housed during the course of a year 2025/26 is estimated at 674, and this is anticipated to increase by a further 10% to 741 in 2026/27. Some of these households will find their own solution, but we forecast that 628 will require accommodation in either the social or private rented sector. Our aim is to eliminate the use of nightly paid accommodation and for housing supply to keep pace with new demand from homeless households.

To do this, in addition to meeting the demand arising during the year, settled accommodation is also needed for the currently 800+ households in nightly paid temporary accommodation.

This is demand from homelessness households only and demand from other residents is additional to this.

We need to increase supply significantly, particularly private sector supply, but also social sector supply in order to meet demand. We need to frontload meeting this demand as much as possible to achieve a rapid impact.

Social Housing Supply

Hillingdon Council owns approximately 10,000 homes for social renting and there are a further roughly 8,000 homes owned by Private Registered Providers (mainly Housing Associations) in the borough.

During 2024/25 there were 690 social housing lettings of which 383 went to homeless households. This includes both re-lets of current social homes as they become vacant and through lettings of additional stock from new development and acquisitions of existing properties.

Our target is for 500 social housing lettings to homeless households during 2025/26. This will be achieved mostly through a marked increase in acquisitions and new house building.

An increased proportion of lettings will go to homeless households, and we will engage with Housing Associations working in the

borough to also maximise social lettings within their housing stock.

We will also consider including quotas for young people, vulnerable adults and single homeless in an annual lettings plan.

Making best use of our existing homes

We have a number of workstreams that are focused on using our existing council properties to better meet housing need. These include:

- Tackling Fraud – Our Counter Fraud team are active in recovering social housing properties that have been fraudulently let and in identifying when temporary accommodation is not being used as arranged for homeless households
- A cash incentive scheme provides incentives for existing tenants to purchase alternative properties, freeing homes for those in need.
- We have an active extension programme which modifies suitable void properties to create much needed larger homes.
- A Home Release Downsizer programme includes incentives for tenants to move

to smaller properties and release family homes.

The council uses some of its own housing stock for temporary accommodation. Where appropriate we will consider making settled offers in the existing homes.

Property Acquisitions

During 2024/25 there were 228 property acquisitions completed, some, but not all of which were let to homeless households.

More than half of the acquisitions were studios and 1 bedroom properties; 2 and 3 bedroom properties made up 20% each and 4 bedroom properties accounted for 4% of acquisitions.

The acquisitions included a pilot programme with a company to purchase and refurbish 20 properties on our behalf. This programme has now been extended to purchase an additional 200 properties. The contract runs for 2 years, but the aim is for all of the properties to be purchased in the first year.

We also have an in-house team that is continuing to purchase additional homes. The Single Homeless Accommodation Programme (SHAP) accounted for 10 of the

properties purchased in 2024/25 and the Local Authority Housing Fund (LAHF) accounted for 16 purchases in 2024/25 and will provide grant funding towards the purchase of a further 19 properties in 2025/26.

For 2025/26 we have a target for 300 acquisitions to be completed in total.

By focusing activity on property purchase we will be able to bring additional properties on stream quickly. In future years the balance of acquisition to new build will switch further in favour of new build.

New Housing Development

During 2024/25 the combined number of newly built properties for Social or London Affordable Rent was 176. Of these 19% had 1 bedroom, 69% had 2 bedrooms, 9% had 3 bedrooms and just 3% had 4 bedrooms.

For 2025/26 the projected number of newly developed properties for Social or London Affordable rent is increased by 36% to 239. The new development is still weighted towards smaller properties, but a healthier proportion of 3 bedroom homes is included and a slight increase in the proportion of 4 bedroom homes. 36% have 1 bedroom,

35% have 2 bedrooms, 25% have 3 bedrooms and 4% have 4 bedrooms.

Private Rented Sector

We aim to increase private sector supply for both settled housing and to provide temporary accommodation.

Leasing Programme

The Council is transitioning from a temporary accommodation portfolio significantly reliant on insecure, expensive nightly paid accommodation to a more secure and cost effective, leased based portfolio.

Longer term leases for a minimum of 10 years and one day are being secured and held within the Housing Revenue Account.

We are exploring the option to transfer existing leased properties used for temporary accommodation to Hillingdon First or the Housing Revenue Account. This will allow increased funds to be reclaimed via government subsidy.

This will ensure due diligence and full evaluations of any future leasing arrangements.

Settled housing in the Private Rented Sector

We will continue to engage with private sector landlords to ensure a good working relationship with them and to understand how best we can attract landlords to provide homes for our homeless residents.

Our most recent Landlord Forum was successfully held in July 2025. We aim to hold forums on an annual basis at a minimum. It provides a networking opportunity to explore working relationships and new supply opportunities and to keep landlords up to date with changes to legislation, policy etc.

Our offer to landlords including incentives is kept regularly under review and other initiatives, such as insurance and bonds are being explored.

We will actively engage larger landlords and investors to understand what is needed for them to be able to operate in Hillingdon and meet our housing needs.

We will explore the opportunity of becoming a direct provider of PRS through Hillingdon First or a similar entity and will review our Allocations Policy to include enhancements for residents who secure their own PRS from temporary accommodation.

We will review temporary accommodation rents so that they are more into line with those charged in the private rented sector. The disparity between rents acts as a disincentive to move-on.

Standards in the Private Rented Sector

We are committed to ensuring a good quality accommodation in the private rented sector and supporting our resident to find their own homes

All temporary accommodation is subject to routine inspections. We aim to increase the regularity of inspections. Ideally these would happen at least once a year.

We carry out or arrange for inspections for properties that we lease or offer incentives for.

The physical standards in temporary accommodation should be comparable to those in the general council housing stock. The homes should be free from damp and mould or major hazards and repairs should be carried out in set timescales.

Supported Housing

Supported housing is an important part of our supply for single homeless people. This is provided in properties leased from private sector landlords by Trinity and dwellings in Ventura House provided by YMCA. (See Priority 4: Housing Pathways for Single Homeless and Rough Sleepers).

Temporary Accommodation

An HRA Capital funded lodge acquisition programme is under consideration to acquire 100 units of temporary accommodation. These will be hostel-like units, such as HMOs, decommissioned care homes and hotels. This will deliver improved temporary accommodation property and management standards and reduced costs.

Strategic Priority 3: Support Access to Safe, Suitable, Sustainable Accommodation – Our Goals

Increase Access to Safe, Suitable and Sustainable Housing

- Develop a homelessness accommodation pipeline plan
- Maximise use of council-owned assets for homelessness provision
- Address HMO quality and regulation through licensing schemes and inspections

Maximise use of existing council housing stock through:

- Fraud recovery
- Promoting downsizing
- Extension programme to create larger homes
- Cash incentives to release properties

Reduce Reliance on Emergency Housing

- Increase supply of temporary and supported accommodation
- Continue to develop relationships with individual private sector landlords to

reduce the number of properties let on a nightly basis and maximise settled housing opportunities

- Strengthen partnerships with housing associations and larger private sector housing providers

Improve Pathways to Settled Housing

- Secure move-on options through collaboration with housing providers
- Promote tenancy sustainment and support services
- Monitor and evaluate transition outcomes to inform future planning

Outcomes for Residents

- Residents have timely access to safe, suitable and stable accommodation
- Fewer residents are placed in emergency housing
- Residents experience smoother transitions from temporary to permanent housing
- Accommodation meets the needs of different household types

Strategic Priority 4: Targeted housing pathways for single homeless, rough sleepers and other groups

Sleeping rough can have serious and lasting impacts on both physical and mental health. Where instances do occur, we are committed to ensuring they are rare, short-lived, and not repeated.

High numbers of asylum seekers are currently placed by the Home Office near to Heathrow airport and the Council is also seeing significant number of families arrive from the Chagos

Islands via Heathrow Airport seeking housing support.

We remain committed to working collaboratively with both commissioned and non-commissioned services to support individuals sleeping rough, ensuring they are assisted off the streets as swiftly and sustainably as possible.

In 2024/25, Thames Reach Hillingdon Street Outreach team, has supported 793 individuals who have been bedded down and sleeping rough in Hillingdon. 492 have been seen in Hillingdon borough and 301 at Heathrow airport. Of these, 16% were female and the vast majority were male. 3 were noted as not known. The number seen bedded down at the airport is 2% lower than in 2023/24, but the number in Hillingdon borough increased by 66%. Anecdotally, the number of rough sleepers made up of asylum seekers/refugees has increased. Numbers of rough sleepers increased with each consecutive quarter of 2024/25.

The proportion of rough sleepers from EEA European countries declined between

2021/22 and 2024/25, while those from African nations increased. While the 26 to 35 age range consistently has the highest number of rough sleepers, over the last couple of years there has been an increase in younger rough sleepers aged 18 to 25. The number of individuals seen sleeping rough on multiple occasions rose significantly between 2023/24 and 2024/25, highlighting a growing issue of entrenched or repeat homelessness in the borough.

The following tables show the support needs of roughs sleepers and if there is an institutional or armed forces history. There is a mental health support need for 43% of rough sleepers at Heathrow and 38% of rough sleepers in the rest of the borough. Support needs related to alcohol are more prevalent than for drugs at Heathrow but a support need for drugs is more prevalent than for alcohol in the rest of the borough.

Support needs 2024/25	Heathrow	Rest of Hillingdon
Mental Health	128	187
Alcohol	49	96
Drugs	34	106
More than one of alcohol, drugs	49	106

and mental health		
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Institutional & Armed Forces history 2024/25	Heathrow	Rest of Hillingdon
Armed forces	16	12
Prison	43	86
Care history	9	21

Total rough sleepers	301	492
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- Heathrow Travel Care (HTC) is a social work team based at the airport. Their purpose is to assess, advise and assist anyone in potential difficulty at the airport and this includes working with rough sleepers. HTC is part funded by the Council.
- Hillingdon offers dedicated accommodation for rough sleepers at Olympic House, comprising 33 supported beds and including 5 emergency bed spaces and 5 bedspaces for individuals without recourse to public funds. The service is delivered in partnership with Trinity who provide tailored support to help residents access education, training, employment opportunities, private rented accommodation, and immigration advice where appropriate.
- Additional services, including ARCH and Central and North West London NHS Foundation Trust (CNWL), attend Olympic House regularly to provide specialist support. Their involvement helps improve outcomes by supporting individuals to remain off the streets and prepare for move-on accommodation.
- Funding was successfully secured through the Rough Sleeping Drug and

Alcohol Treatment Grant (RSDATG), provided by the Office for Health Improvement and Disparities (OHID). This funding enables targeted support for individuals who are rough sleeping or at risk of doing so, helping them to access substance misuse treatment and wider health services.

- Single Homelessness Accommodation Programme (SHAP) delivered supported housing for young people aged 18-25 at risk of homelessness. The scheme enabled Hillingdon to provide 20 single-person units across 10 properties, combining stable housing with tailored support to help people move on and rebuild their lives.
- We successfully secured grant funding through the Accommodation for Ex-Offenders (AfEO) scheme, enabling us to work in partnership with key agencies to support individuals leaving custody who may be at risk of homelessness. The programme aims to provide stable accommodation and tailored support to reduce reoffending and promote successful reintegration into the community.
- Trinity Shared Supported Housing: Trinity help to unblock the shortage of

Current Service Provision

- Voluntary and community sector (VCS) organisations are encouraged to engage with residents through community-based projects, fostering a sense of belonging and connection to the local area.
- Thames Reach is commissioned to deliver a borough-wide rough sleeping outreach service, operating up to seven days a week. The team provides direct support to individuals found sleeping rough, including those with restricted eligibility, with the aim of helping them exit street homelessness as swiftly and sustainably as possible.

housing for single people by making it accessible through creating shared housing in the Private Rented Sector without the need for employment, deposits or credit history. The council has 100% nomination rights to the accommodation. As at September 2025 they were 195 bedspaces.

- Riverside Hotel is owned by Trinity and provides 41 self-contained affordable apartments. These units are designed to support low-income households, especially those who have experienced homelessness or social exclusion. The development is part of a move-on accommodation strategy, helping individuals transition from shared housing to independent living.
- Trinity also currently supports 15 ex-rough sleepers via floating support in the community to ensure tenancy sustainment.
- We are committed to improving the welfare of asylum seekers and supporting them wherever possible. Welfare bridging support has been established for families and individuals to help them settle into new accommodation and access services. We work with organisations from the voluntary sector to support asylum seekers.

- Housing support is being provided for those arriving from the Chagos islands via Heathrow, where they are eligible.

Strategic Priority 4: Targeted housing pathways for single homeless, rough sleepers and other groups – Our Goals

Build Clear and Sustainable Housing Pathways

- **Robust Pathways:** We are committed to establishing and maintaining clear, robust pathways and processes that effectively support individuals to move away from rough sleeping and into sustainable accommodation.
- **Pathways for new arrivals:** Housing options for those recently arrived in the country take account of eligibility and the cost of accommodation. Accommodation is in short supply and options in other areas are part of our considerations.
- **Shared accommodation:** We aim to increase our shared accommodation provisions for under-35s.
- **Targeted Supported Housing for 18-25s:** Create dedicated pathways into

supported housing that reflect the transitional needs of young adults, including access to education, employment and mental health services.

In 2025/56, the most significant reason for loss of settled home among the group is being required to leave accommodation provided by the Home Office as asylum support, accounting for 30.6% of all cases. This is closely followed by situations where the family is no longer willing or able to accommodate the individual, which makes up 24.7% of the total.

Together, these two reasons represent over half of all cases, highlighting the critical impact of both institutional transitions and family breakdowns on housing stability for young people.

- **Safe Temporary Accommodation for Survivors of Domestic Abuse:** a proposal is under consideration to acquire 30 units of accommodation for domestic abuse survivors which would provide improved property and management standards.
- **Benefit capped households:** Combine housing advice with employment and

other support to expand the range of available options.

- **Hospital discharge:** A dedicated officer is working with hospital discharge teams to relieve pressure on bedspaces by assisting patients to return home or find alternative accommodation.

Strengthen Partnership and Outreach to Address Complex Needs

- **Partnership Working:** We will continue to work collaboratively with other London boroughs in partnership to provide coordinated support for individuals experiencing complex rough sleeping, ensuring a joined-up approach to addressing their needs.
- **Off-street transition:** We are committed to ongoing collaboration with both commissioned and non-commissioned services to support individuals experiencing rough sleeping, with the aim of helping them transition away from the streets and into stable accommodation with focused outreach.
- **Outreach Services:** Review our rough sleeping outreach service to ensure it remains responsive to the evolving needs and challenges within the

borough, and continues to deliver effective, targeted support.

Promote Recovery, Independence and Long-Term Stability

- **Health and wellbeing:** Focus on the health and wellbeing of individuals experiencing rough sleeping across all services, while also ensuring access to meaningful opportunities in education, training, and employment to support long-term recovery and independence.
- **Independent living:** We aim to empower individuals to progress positively in their lives by providing tailored support that enables a successful transition from supported accommodation into independent living.
- **Housing first:** Begins with a simple but powerful principle: a settled home. From that solid foundation, people can access the tailored, wraparound support they need to address deep rooted challenges. It is suitable for those with complex challenges and disadvantages requiring intense support like an adult social care intervention.

Outcomes for Residents

- More effective and joined-up support for individuals with complex needs
- Clearer and more accessible pathways
- Increased access to shared accommodation
- Successful transitions from street homelessness
- Dedicated supported housing for young people aged 18–25
- Access to Housing First placements for those with complex needs, offering stability and wraparound care.
- Tailored support for refugees and asylum seekers, ensuring smoother transitions from Home Office accommodation.

Measuring Success

- Identification and pursuit of new funding opportunities to support rough sleeping initiatives
- Number of individuals accessing support through the dedicated pathways
- Number of people supported into settled and secure accommodation
- Increase in the number of single homeless individuals placed into

Hillingdon Homelessness and Rough Sleeping Strategy 2026 to 2030: Draft for Consultation
sustainable accommodation, including
Housing First and shared housing.

- Reduction in the number of individuals sleeping rough, as measured by CHAIN and local outreach data.
- Increased participation in training, education, and employment programmes among formerly homeless individuals.

Strategic Priority 5: Modern data led cost effective services

A desire to adopt a modern, intelligence-led approach that places data, digital innovation, and value for money at the heart of service design and delivery.

This priority recognises the need to improve operational efficiency, enhance decision-making, and ensure resources are targeted where they have the greatest impact. Predictive analytics, and performance monitoring, will allow the Council to strengthen its ability to respond to emerging trends, reduce reliance on costly temporary accommodation, and improve outcomes for residents.

One of the council's ambitions is to be a digital-enabled, modern, well-run sustainable council with sound financial

management achieving positive outcomes for residents.

Our Digital Strategy sets out our vision to embrace technology to be efficient and make it easier for residents to use council services, including supporting those who are unable to use technology.

We aim to better understand our residents' needs, through the smarter use of joined up data sets and for our workforce to be digitally skilled and equipped with the systems they need for their work and to put residents first.

Current Service Provision

- Temporary Accommodation costs, Private Rented Sector incentive payments, and acquisition programme spend are tracked against budget forecasts to ensure value for money.
- Hillingdon's commissioned outreach team records rough sleeping data via the London-wide CHAIN system. Data quality is routinely monitored to ensure accuracy and track performance against targets. This enables the Council to identify trends and respond proactively.
- Homelessness Case Level Information Collection (H-CLIC) statistical returns

are used to provide overview of key homelessness trends in the borough

- Online portal for creation and ongoing homelessness applications for resident and service to collaborate
- Data analytics supports corporate strategic planning and improved service outcomes with more targeted interventions.
- Referrals made under the Duty to Refer are made formally and properly recorded.

Strategic Priority 5: Modern data led cost effective services – Our Goals

Use Data to Drive Prevention and Early Intervention

- **Centralised Homelessness Dashboard:** A dashboard will be developed to provide real-time visibility of key metrics including case volumes, temporary accommodation usage, referral pathways, and service outcomes. The dashboard will support operational oversight, strategic planning, and performance management across departments.

- **Predictive Analytics:** Predictive analytics will be used to identify households at risk of homelessness earlier, enabling targeted interventions.
- **Data Modelling:** will support resource allocation, forecast demand, and inform commissioning decisions. This approach will reduce crisis presentations and improve long-term outcomes.

Embed Performance, Workforce and Service Quality Monitoring

- **Benchmarking:** Benchmarking against other London boroughs and national indicators will ensure services remain competitive, efficient, and responsive. Comparative analysis will inform policy development, highlight areas for

improvement, and support continuous learning.

- **Monitoring case volumes, staff burnout:** Regular monitoring of case volumes, staff caseloads, and wellbeing indicators will be embedded into service management. This will support workforce sustainability, reduce burnout, and maintain service quality.
- **Key metrics:** so as re-approach rates, resolution times, and resident satisfaction will be tracked.

Outcomes for Residents

- Earlier identification and prevention of homelessness.
- Reduced time spent in temporary accommodation.

- Enhanced resident experience through digital access and empathetic service delivery.
- Greater housing stability and reduced repeat homelessness.
- More equitable access to services for underrepresented groups.

Measuring Success

- Reduction in average case handling time
- Increase in resident engagement via online portals (e.g. appointment bookings, document uploads)
- Number of households identified as at-risk before crisis presentation
- Reduction in repeat homelessness cases
- Evidence of service redesign informed by benchmarking insights

Effective from:	xxxxx		xxxxxx
Policy Owner:	Dan Kennedy – Corporate Director Residents Services		
Policy Author:	Debby Weller/Sachin Patel		
Approved by:			
Version Number:	V1		

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Appendix B

Homelessness and Rough Sleeping Review 2025

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Executive Summary

Hillingdon faces rising homelessness demand, driven by affordability pressures, asylum dispersal, and private rental market contraction.

This review document considers the following to inform the development of our homelessness strategy:

- Current and future demand related to homelessness in Hillingdon.
- Existing prevention activity, accommodation, and support for homeless households.
- gaps and challenges in current homelessness services.

Key findings

Recent and future developments impacting on Homelessness and Rough Sleeping

- COVID-19 and resulting changes in responses to rough sleeping. This included 'Everyone In' and an increase in grant funding options for rough sleepers which aided development of our rough sleeping pathway.
- Changing working patterns with much more online and hybrid working.
- World affairs, increased migration and shifting public opinion and political scene. High numbers of asylum seekers and government speeding up of decision making with the aim to reduce use of hotels for migrants.
- Periods of increased inflation and interest rates, increasing unaffordability and wider sections of the population affected by homelessness.
- Widening gap between Local Housing Allowance and rental costs.
- Landlord rent increases, Section 21 evictions, and some exiting of the market particularly by landlords with small numbers of properties.
- Impact of the building safety agenda and social housing regulation on the balance of social housing provider investment going to existing homes rather than new provision.
- Change of government. Stated ambition for 1.5m homes and increase in social rented supply, but considerable challenges in delivering.
- Big increase in the numbers of homeless families in nightly paid temporary accommodation with associated costs and risks to council finances.
- Forthcoming licensing of supported housing.
- Renters' Rights Bill will bring major reforms to tenancy law—ending Section 21 evictions, introducing Decent Homes Standards (including Awaab's Law), capping rent increases, and launching a landlord ombudsman.
- The nature of the housing sector continues to evolve, with larger landlord portfolios in the private rented sector and an increasing presence of for profit providers in the social rented sector. More small landlords exiting the market.
- Advances in digital technology bringing both efficiencies and additional challenges around digital exclusion and potentially large changes associated with AI.

Homelessness and related data

England January to March 2025

- Initial assessments to determine whether a homelessness duty is owed were down 6.3% compared to the same quarter in 2024.
- Those owed a prevention duty were down 4.5%.
- Those homeless and owed a relief duty were down 7.1%.
- Those owed a main homelessness duty were down 7.9%.
- 131,140 households were in temporary accommodation on 31 March 2025, an increase of 11.8%.
- Households with children in temporary accommodation increased by 11.6%.
- Single households in temporary accommodation increased by 12%.
- 3,870 households with children were in non-self-contained accommodation, nightly paid accommodation; down 30.1% from 31 March 2024. 2,300 had been resident for more than 6 weeks, a 29% drop.
- The number of households in temporary accommodation is much higher in London than in other parts of the country.

Hillingdon data April 2024 to Mar 2025

- The number of households assessed as owed a prevention or relief duty during 2024/25 was 2053 (728 prevention 35%, 1325 relief 65%). Of these 1,381 had a household member with a support need.
- The ethnic profile of homeless applicants in Hillingdon shows a substantial overrepresentation of certain ethnic minority groups, particularly Black and 'Other' ethnic communities including Arab and other unspecified categories. White and Asian residents are underrepresented.
- Approaches by those threatened with homelessness in Hillingdon are on an upward trend. There were 7,306 approaches in 2024/25. The most common reasons for approach are family and friend evictions (63% singles, 37% families), private rented sector (PRS) S21 evictions (25% singles, 75% families), and ending of home office accommodation (81% singles, 19% families). These three reasons account for 58% of approaches. The number of approaches is expected to increase again in 2025/26.
- The number of households in nightly paid accommodation and the cost of that accommodation is increasing. This has become a significant financial issue for the Council and prompted the development of a dedicated action plan to reduce use of high cost provision.
- On 1 April 2025 there were 1,562 households in temporary accommodation (TA), an increase of 36% compared to the previous year. Of these 796 were in nightly paid accommodation, a 10% increase over the previous year. There were no households in non-self-contained nightly paid accommodation on or since 1 April 2025.
- Bookings into nightly paid accommodation between April 2025 and March 2026 totalled 740. This is 8% more than the previous year.
- Bailiff warrants for private sector evictions are by far the most prominent reason for bookings into nightly paid accommodation, accounting for 42% of all bookings in 2024/25. This rises to 58% of bookings for families requiring 3 bedrooms and 82% of bookings for those requiring 4 bedrooms or more. Other prominent reasons for bookings are domestic abuse (13%), ending of Home Office accommodation (11%), and friends and family evictions (9%). The most common booking reason for those needing a single bedroom was domestic abuse, accounting for 18% of bookings, followed by hospital discharge (14%) and bailiff warrant/PRS eviction, medical and, ending of Home Office accommodation (all 13%).

- The highest number of bookings was for households needing 2 bedrooms (269), followed by 1 bedroom (208), 3 bedrooms (198), and then 4 or more bedrooms (69).
- On 31 March 2025 there were 3,194 households on Hillingdon Housing Register (28% 1 bed need, 32% 2 bed, 29% 3 bed & 11% 4 bed or more).
- 895 of those registered were homeless households (29% 1 bed need, 34% 2 bed, 26% 3 bed & 11% 4 bed or more). The vast majority, 830, were owed the main homelessness duty. 46 were owed the relief duty and 19 the prevention duty.
- The main age groups of homeless households on the housing register are 25 to 44 (507) and 45-59 (248). These two groups account for 85% of applicants.
- Overcrowding is the most common cause for registration accounting for 38% of applicants compared to 29% homeless.
- CHAIN data for rough sleepers shows a total of 492 individuals were recorded as sleeping rough in Hillingdon between 1 April 2024 and 31 March 2025. When including figures from Heathrow, this number increases by a further 301 individuals, bringing the total to 793. This combined figure places Hillingdon above neighbouring boroughs such as Hounslow (336), Hammersmith & Fulham (439), Brent (551) and Ealing (723). Harrow recorded the lowest number of rough sleepers across West London, with 94 individuals during the same period.
- The number seen bedded down at the airport is 2% lower than in 2023/24, but the number in Hillingdon borough increased by 66%.
- The vast majority of rough sleepers in Hillingdon borough (excluding Heathrow) are male, 26 to 35 is the large age group. The main ethnic make-up is 33% White, 28% Asian or Asian British and 26% Black or Black British. The number seen rough sleeping on multiple occasions rose significantly between 2022/23 and 2023/24 and remained high in 2024/25, highlighting a growing issue of entrenched or repeat homelessness.
- During 2024/25 there were 187 rough sleepers in Hillingdon borough (excluding Heathrow) with a mental health support need, 106 with a drugs related support need and 96 alcohol. There were 49 rough sleepers with more than one support need and 121 with no alcohol, drugs or mental health support needs.
- The corresponding figures for Heathrow were: 128 rough sleepers at Heathrow with a mental health support need, 49 with an alcohol related support need and 49 drugs. There were 106 rough sleepers with more than one support need and 168 with no alcohol, drugs or mental health support needs.
- The proportion of female rough sleepers is much higher at Heathrow accounting for between 23% and 29% each year since 2020/21.
- Of the rough sleepers in Hillingdon borough in 2024/25 there were 9 people previously in the armed forces, 86 in prison and 21 care leavers. The corresponding numbers for Heathrow were 8 armed forces, 43 prison and 9 care leavers.
- Hillingdon has a 'Target Priority Group' of 19 complex and entrenched rough sleepers.
- We have a growing cohort of people facing homelessness and rough sleeping after being moved on from Home Office accommodation. Hillingdon has the highest concentration of asylum seekers in contingency hotel accommodation in any London borough. A growing number are becoming street homeless as the council struggles to meet statutory obligations amid funding shortfalls and rising demand.
- There is a generally upward trend in repossession across landlord types.
- Based on July 2024 to June 2025 average rental costs were between £224 more per month than Local Housing Allowance rates for a 1 bed roomed property to £788 more for a 4 bed roomed property.

- We estimate that there will be approximately 741 bookings into nightly paid temporary accommodation during 2026/27. To remove the need for nightly paid accommodation and keep pace with homelessness demand, it is estimated that we will need to source accommodation placements for around 628 of these bookings as some will make their own arrangements. We will also need find alternative accommodation for the 800+ households currently in nightly paid temporary accommodation.

Homelessness Challenges and Priorities

- A dedicated plan has been developed to reduce the number and cost of households placed in temporary accommodation. The following four workstreams are taking this work forward.
 - Increase prevention and reduce new temporary accommodation placements
 - Increase access to alternative housing options
 - Reduce the cost of temporary accommodation
 - Increase move-on into social housing
- The Council's Cabinet has approved taking forward recommendations made by the Residents' Services Select Committee Review into the Council's Housing Advice and Homelessness Service. Recommendations are made in the following areas:
 - Enhancing Resident Experience
 - Managing expectations and process efficiency
 - Staff support & training
 - Partnerships & collaboration
- Engagement with stakeholders in developing the strategy has covered a wide range of issues and recommendations. Key emerging themes are:
 - Prioritise preventative work to prevent homelessness at an early stage.
 - Improved partnering arrangements with better planning and coordination of services. Improved data sharing and referral pathways.
 - Engagement with wider range of voluntary and faith based organisations
 - A focus on service delivery to ensure professionalism, consistency and efficiency. Better collaboration between teams. Clear plans and guidelines. Clear governance and decision making structures.
 - Need for more joint training, protocols and communication channels with internal and external partners.
 - Further integration of employment support with housing services.
 - Need for a quality control and performance management culture along with a framework that promotes staff wellbeing and prevents burnout.
 - Concerns regarding increased numbers of asylum seekers and the fairness of pressure on Hillingdon in particular. A large proportion are single males and a lack of resources for this group, that does not have statutory priority need, is impacting on rough sleeping.
 - A need for mental health outreach services.

- Specific groups - Increase in households with an autistic member; housing options for those under 35 and for those who are benefit capped; reluctance of landlords to accept ex-offenders, solutions for those without recourse to public funds; increased domestic abuse presentations.
- Further develop existing work to enhance data capabilities and allow for access to data on demand. Explore opportunities for use of AI to assist in service delivery.
- Focus on increasing accommodation options for both temporary and permanent housing across tenures. To include longer term leasing options and a planned acquisitions and development programme with a key focus on reducing TA volumes and costs.
- Building corporate landlord relationships, concerns regarding S21 changes causing landlords to exit the market. Engagement plan for landlords; coordination to identify HMO landlords early and to work with them.
- Unaffordable housing options, especially for single adults combine with a reluctance to consider other geographical areas. Need to ensure that residents are provided with information to enable them to make an informed choice about realistic, sustainable options.
- Concerns around the quality of accommodation and anti-social behaviour.
- Mechanism to monitor and capture learning from complaints and reviews. Structured approach to gathering resident feedback.
- Consideration should be given to see how a Housing First model could potentially work in Hillingdon.

1. Introduction

The homelessness review is about understanding the picture related to homelessness in Hillingdon. Its purpose is to determine the extent to which the population in the district is homeless or at risk of becoming homeless, assess the likely extent in the future, identify what is currently being done and by whom, and identify what resources are available, to prevent and tackle homelessness.

The Homelessness code of guidance for local authorities requires that the review of homelessness includes:

- (a) The levels and likely future levels of homelessness in the borough;
- (b) The activities which are carried out for any of the following purposes (or which contribute to achieving any of them):
 - I. Preventing homelessness in the borough
 - II. Securing that accommodation is available for people in the district who are or may become homeless; and
 - III. Providing support for people in the district who are homeless or who may become at risk of homelessness; or who have been homeless and need support to prevent them becoming homeless again; and,
- (c) The resources available to the housing authority, the social services authority, other public authorities, voluntary organisations and other persons for the activities outlined in (b) above.

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Changes since our last Homelessness and Rough Sleeping Strategy

Our last strategy was published right at the end of 2019 and there have been huge changes in the landscape around homelessness services since that time. It was shortly before Covid hit and the accompanying lockdowns. This had significant impacts for homelessness and for the working environment in general. It speeded up a transition to more online and home working. Many councils stopped in person work with homeless people altogether although that wasn't the case in Hillingdon.

'Everyone In', Rough Sleeping Initiative and development of Hillingdon's Rough Sleeping Pathway

Of particular significance was the 'Everyone In initiative which saw around 160 rough sleepers moved into accommodation from Heathrow Airport. Arrangements were made for leasing of Olympic House, a 33 bed unit which provides first stage accommodation for rough sleepers and a hub to provide other services for homeless clients.

Throughout the last homelessness strategy there have been grant funding regimes for homelessness, especially for rough sleepers. The Rough Sleeper Initiative (RSI) in particular has been significant in developing the rough sleepers' partnership in Hillingdon. Other funding streams such as public health funding for drug and alcohol services for homeless people and funding for accommodation has also enabled increased service provision.

Affordability, private rental market and cost of living

Incremental reform of the PRS has created churn in the market as small-scale investors sell up and the stock becomes slightly more concentrated among professional business landlords with larger portfolios. Large landlords, such as those in the Build to Rent market have emerged as an important component but remain peripheral.

Demand in the PRS remains high and rents have risen. In 2024/25, Hillingdon's average rent stood at £1,423, marking a 12% annual increase from the previous year. This is £429 higher than the England average (£994), but still below the London average, which reached £2,698 for new tenancies in Q1 2025. Hillingdon ranks 28th out of 33 London boroughs in terms of rental cost, indicating it's relatively more affordable position within the capital.¹ The most common rental property type in Hillingdon is 2-bedroom homes, comprising 39.1% of the rental stock.

The Local Housing Allowance (LHA) rates for Hillingdon are set annually by the Rent Officer. After having been frozen for a number of years, the government re-pegged LHA rates to the 30th percentile of local rents as of September 2023 and applied this rate from April 2024, resulting in an average increase of 16% across Broad Rental Market Areas (BRMAs). In Central London, households renting a 3-bedroom property saw support rise by up to £82 per week. In Outer London areas like Hillingdon, increases were more modest but still significant. The April 2004 adjustment was not repeated for 2025 when 2004 rates were carried forward. While exact figures on how many properties were listed at LHA levels aren't published, anecdotal evidence and council data suggest a significant shortfall in properties available at or below LHA rates, especially for larger households. The gap between average rents charged between July 2024 and June 2025 ranged from £223 for 1 bed properties to £788 for 4 bed properties.

Savills has recently published a comprehensive analysis on the availability of private rented accommodation in the UK, highlighting a significant structural shift in the market. Their report, *Beyond Buy to Let*, reveals that small individual landlords are exiting the market at an accelerated pace, with 290,000 rental properties sold between 2021 and 2024, compared to just 130,000 new Build to Rent homes delivered.² The ratio of homes sold by landlords to those bought by landlords from owner occupiers reached 5.4:1 in 2024, up from 1:1 in 2021. This trend is driven by rising costs, tax changes, and ageing landlord demographics, with many seeking to cash in on capital gains. The result is a net loss of rental supply, particularly in suburban areas, where listings remain 31% below pre-pandemic levels.

¹ [Council and housing association evictions: Overview - GOV.UK](#)

² [Savills UK | Beyond Buy to Let: Where next for the UK private rented sector](#)

In London, a joint study by Savills and the London School of Economics found that the availability of private rented homes has dropped by 41% since 2017, with the steepest decline in larger properties³. The research shows that only 5% of listings were affordable to households relying on Local Housing Allowance (LHA) in mid-2024, despite a nominal LHA rate increase. The contraction is most severe in the most affordable areas, where rental stock is disappearing fastest. This has profound implications for homelessness prevention, as boroughs increasingly struggle to source suitable accommodation. The reports call for urgent government intervention, including raising LHA rates, offering fiscal incentives to landlords, and funding public acquisition of rental stock to stabilise the market and vulnerable renters.

Developments in Housing Case Law

In recent years, the legal landscape surrounding homelessness in England has undergone notable shifts, driven by evolving interpretations of statutory duties and the impact of broader societal challenges such as the COVID-19 pandemic. For housing professionals and policy officers, staying abreast of these developments is essential - not only to ensure compliance with legal obligations but also to uphold the rights and dignity of those experiencing homelessness. Since 2020, several key court decisions have clarified the responsibilities of local authorities, particularly in relation to the provision of suitable accommodation, assessments of vulnerability, and the treatment of repeat applications. The following case law highlights some of the most influential rulings that continue to shape policy and practice in this sector.

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Croydon LBC v Imam reinforced that financial constraints do not absolve councils from their statutory obligations, with the Supreme Court affirming that mandatory orders can compel compliance unless robust justification is provided⁴.

Other cases have focused on the quality and suitability of accommodation offered. In Hajjaj v Westminster, the Court of Appeal ruled that councils must base suitability assessments on evidence, not assumptions, especially when offering private rented homes. Similarly, Ciftci v Haringey clarified that while councils have discretion in determining intentional homelessness, they must still conduct reasonable enquiries and document their decisions thoroughly. Collectively, these rulings underscore the need for transparency, evidence-based decision-making, and procedural rigour in how homelessness duties are administered.⁵

Increase in number of asylum seekers

³ [Private Rented Sector Supply in London | London Councils – Home](#)

⁴ [Key Supreme Court judgment concerning... - Landmark Chambers](#)

⁵ [Homelessness duties for local authorities - Birketts](#)

Since the last Hillingdon homelessness strategy was published there has been a significant increase in the number of people claiming asylum. Between 2004 and 2020 there were between 22,000 and 46,000 people claiming asylum in the UK each year. However, since the second half of 2021 the increase has been notable, with 109,000 applications in the year to the end of March 2025, of which 33% arrived via small boats.⁶ The total asylum caseload has grown, driven both by applicants waiting longer for an initial decision and a growth in the number of people subject to removal action following a negative decision.

The North East and the North West regions have the highest number of asylum seekers relative to their population. London also has a high ratio compared to other areas (21.2 per 10,000 at the end of March 2025) due to the presence of a large number of asylum seekers in hotels which, along with the proximity of Heathrow airport, has impacted on the number of asylum seekers in Hillingdon and Hounslow. The topic has become increasingly contentious, marked by demonstrations and legal action in some areas.

As the government has taken actions to speed up processing of asylum applications and reduce the number housed in hotels, this has meant additional pressure on local authority homelessness advice and housing services and has negatively impacted on rough sleeping numbers in the capital.

Action has been taken from September 2025 to pause the Refugee family reunion scheme, while changes are made to the law. Under proposed new rules, refugees will have to remain in the UK for two years to qualify to bring their family and will face tougher financial and language requirements.

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Future changes affecting homelessness and rough sleeping

The Mayor's Rough Sleeping Plan of Action 2025

The Mayor of London's 2025 Rough Sleeping Plan of Action outlines a comprehensive and ambitious strategy to eliminate rough sleeping across the capital by 2030. Central to the approach are measures aimed at prevention, early intervention, and the provision of sustainable housing pathways. A key reform includes transitioning from the current requirement for individuals to be visibly rough sleeping before receiving support, to a needs-based assessment model by 2028. The plan proposes the establishment of Ending Homelessness Hubs, the launch of a dedicated prevention phoneline, and the expansion of support worker outreach in community settings such as day centres and food banks.

A flagship initiative, 'Homes off the Streets', will see up to 500 vacant social housing units refurbished for long-term accommodation for those at risk. The Mayor has secured £17 million in government funding, alongside a £10 million investment from City Hall, to underpin these interventions. The strategy also urges central government to enhance funding for local authorities, restore the social safety net, and significantly increase the

⁶ [How many people claim asylum in the UK? - GOV.UK](#)

supply of affordable housing. Building on previous achievements, including supporting over 18,000 individuals off the streets, the plan marks a shift from reactive crisis management to a system-wide, preventative approach.⁷

Applications for the Homes Off the Streets Programme (part of the Affordable Homes Programme 2021–2026) must be submitted via the GLA’s Open Project System (OPS), with projects starting on site by March 2026 and most completions expected by 2028 (some strategic sites may extend to 2029). Application proposals should include project details, tenure mix, financials, and timelines. The GLA prioritises large-scale, deliverable schemes that demonstrate value for money, quality, and alignment with Mayoral priorities such as sustainability, equality, and building safety.

National Government Approach to Homelessness

The government has in December 2025 published ‘A National Plan to End Homelessness⁸’, its Homelessness and Rough Sleeping Strategy and is set to publish a wider Housing Strategy. The Homelessness Strategy is cross-government, to include a focus on prevention and to deliver a long-term plan. The Plan aims (1) to halve rough sleeping within 3 years; (2) to end the use of bed and breakfast as temporary accommodation for families with children beyond the statutory limit of 6 weeks and (3) prevent more households from becoming homeless in the first place. Public investment over the next three years includes a fourth round of the Local Authority Housing Fund which will help to increase the supply of good-quality temporary accommodation. Action to help prevent homelessness includes an additional Homelessness Prevention Grant in the current year, 2025/26, and a new duty on public bodies to work together to prevent homelessness, which is intended to ensure that no-one is discharged from prison, hospital or asylum accommodation without accommodation being available for them. There will also be a review of social housing allocations policy to assess how effectively housing associations and local authorities are using new homes and relets to meet the needs of homeless households.

The wider ‘Plan for Change aims to also boost social and affordable housing and end no fault evictions. It has been confirmed that the Vagrancy Act 1824 will be repealed by Spring next year to ensure that rough sleeping is no longer a criminal offence.

The Government has proposed reforms to how homelessness services and temporary accommodation are funded as part of the Fair Funding Review 2.0. Temporary accommodation funding currently provided through the Homelessness Prevention Grant will be transferred to the Revenue Support Grant which will have a new Temporary Accommodation funding formula to account for varied need for temporary accommodation across the country. All other homelessness and rough sleeping funding will come through a consolidated Homelessness and Rough Sleeping Grant. The separation of TA funding aims to resolve the current tension faced by local authorities between investing in prevention and covering TA costs and will create dedicated ring fenced funding streams for homelessness and rough sleeping prevention.

⁷ [The Mayor's Rough Sleeping Plan of Action 2025 | London City Hall](#)

⁸ [A National Plan to End Homelessness](#)

The Spending Review announced an additional £100 million to fund increased homelessness prevention activity by local authorities. The government is also providing £950 million of investment for the fourth round of the Local Authority Housing Fund to support local authorities in England to increase the supply of good quality temporary accommodation and drive down the use of costly bed and breakfasts and hotels.

A commitment has been made for a £39bn Social and Affordable Homes Programme over the next 10 years to boost the supply of social and affordable housing. 60% of the programme will be aimed at properties for social rent. More of the funding will be in the latter half of the time period, with only around a third in the current parliament. The proportion for London is 30% despite having 56% of the households in temporary accommodation. The Government's overall housing target is for 1.5 million homes over the current Parliament.

Local Housing Allowance (LHA) rates have been periodically capped and frozen and this has resulted in a growing number of households facing a shortfall between the LHA they receive and the rent they pay, impacting on homelessness. For temporary accommodation, funding is essentially based on the 2011 rate and has not kept pace with local authorities' rising TA costs. Government is reluctant to increase spending on LHA but have signalled that they may look again at the time of the Autumn 2025 budget.

New homes delivery across London

Last year, 3,991 affordable homes were started in London. This was well above the 2,358 starts in 2023-24, but still the second-lowest on record.

A number of factors have been highlighted as undermining housing supply and the delivery of affordable homes across the capital. Complex brownfield sites, high land values, rising interest rates, and sustained build cost inflation have increased development costs, leading developers to conclude many projects are 'unviable'. The Mayor has also stated that the requirement for a second staircase in residential buildings over 18 metres as a fire safety measure has also impacted viability.

Affordable housing providers have said that macroeconomic conditions, increased costs relating to their existing stock, and reduced forecast rental incomes have pressured their budgets for building new homes. The rising cost of retrofitting existing homes, especially in relation to fire safety, damp and mould, are major constraints on development plans. Lack of suitable land and inadequate grant levels, given increased build costs and higher environmental standards are also cited.⁹

Renters' Rights Bill

The Renters Rights Bill currently working its way through parliament will strengthen tenants' rights and professionalise property management in the sector. It is expected to receive Royal Assent in late 2025 and to become law in early 2026. It will:

- Abolish section 21 evictions

⁹ [Affordable homes programmes in London, July 2025](#)

- Ensure possession grounds are fair to both parties
- Provide stronger protections against backdoor evictions
- Introduce a new Private Rented Sector Landlord Ombudsman
- Create a Private Rented Sector Database
- Give tenants strengthened rights to request a pet in the property
- Apply the Decent Homes Standard to the private rented sector
- Apply 'Awaab's Law' to the private rented sector
- Make it illegal for landlord and agents to discriminate against prospective tenants in receipt of benefits or with children
- End the practice of rental bidding by prohibiting landlords and agents from asking for or accepting offers above the advertised rent
- Strengthen local authority enforcement
- Strengthen rent repayment orders

Once the bill has received royal assent there is an expected phased introduction of the various measures. Some will only become law when additional regulations are made. Private rented sector enforcement powers are expected to be amongst the earlier measures introduced. The abolition of S21 evictions is currently expected around April 2026. The introduction of the PRS database and of Awaab's law are expected to be further in the future.

The Renters' Rights Bill marks a significant shift in the private rented sector by abolishing Section 21 'no fault' evictions, a long-standing mechanism that allowed landlords to terminate tenancies without providing a reason. This reform is expected to enhance housing security for millions of renters, reducing the risk of sudden displacement and the associated pathway into homelessness. By moving to a system of rolling periodic tenancies and requiring landlords to cite legitimate grounds for possession—such as persistent rent arrears or the need to sell or occupy the property—the Bill aims to create a fairer and more transparent framework. These changes are anticipated to empower tenants to challenge poor conditions and unfair rent increases without fear of retaliatory eviction, thereby contributing to greater housing stability and potentially easing pressure on homelessness services.

In Hillingdon, where demand for temporary accommodation is already high and budgets are under pressure, the removal of this eviction route could help reduce the number of households entering homelessness by offering greater security of tenure. However, the effectiveness of this reform will depend on the timely implementation of court system improvements and the availability of genuinely affordable housing. Without these, the pressure on local services may persist, even as the legislative landscape shifts.

There is concern that some landlords may choose to exit the rental market in response as landlords will no longer be able to regain possession of their properties without citing specific legal grounds, such as rent arrears or anti-social behaviour. The increased reliance on Section 8 and the court system may also raise concerns about delays and administrative burdens, prompting some to reconsider their involvement in the sector. The actual scale of landlord withdrawal will likely depend on how effectively the new system is implemented, including court efficiency and support for landlords navigating the new legal framework.

Supported Housing Regulatory Oversight Act 2023 (SHROA)

The introduction of this legislation was motivated by gaps in regulation, which led to some inconsistencies in standards amongst providers. Additionally, the rapid growth of exempt accommodation, has raised concerns in some areas about high rental charges and limited support being provided. The SHROA seeks to improve oversight by enabling councils to identify and respond to providers who do not meet expected standards. Supported housing provides essential services to diverse groups of individuals with support needs, of interest to homelessness services as well as colleagues and partners working in related areas. Primary groups of people served by supported housing include:

- Older adults
- People with physical and learning disabilities
- People with mental health conditions
- People fleeing domestic abuse
- People experiencing or at risk of homelessness
- People recovering from substance misuse
- Individuals transitioning from the justice system
- Young people leaving care

The SHROA requires local councils to conduct comprehensive needs assessments to understand local demand and plan service provision accordingly. It also requires each council to develop a supported housing strategy outlining how the council plans to meet the assessed needs and include frameworks for monitoring, evaluation and enforcement.

One of the most significant provisions of the SHROA is the introduction of a licensing system for supported housing providers. Councils will be responsible for issuing licences based on a provider's ability to meet new National Supported Housing Standards. This provides the mechanisms and relevant powers for LA s to regulate both commissioned and non-commissioned providers, ensuring that all housing meets consistent standards. Draft regulations are expected early in 2026.

For profit housing providers

The presence of For-Profit Registered Providers (FPRP) in the affordable housing sector is continuing to increase. Savills has found a clear ambition from investors to scale up their portfolios, with an expectation that a current 43,100 homes will triple by 2030. A quarter of the sector's housing stock is expected to be for social rent through new build and through investment in existing homes, releasing capacity for housing associations. This comes at a time when many traditional housing associations have reduced development programmes in favour of investment in existing homes.

Advances in digital technology

The increasing use and the capabilities of digital technology have profound significance for many service areas, including those impacted by homelessness and those working in homelessness services. Digital service delivery is becoming more and more relevant in increasing resident accessibility to services and delivering efficiencies.

Embracing GenAI tools has the potential to assist with general tasks such as writing emails, project planning, and writing up notes for instance. It has also been suggested that AI could be used in homelessness for identifying risk factors that may lead to homelessness and for coordinating the support people experiencing homelessness receive from various channels helping to match services to a person's specific needs. There are also potential pitfalls including the need to check the accuracy of information produced and ensuring that confidential and sensitive information is not shared. AI has potential but can also draw unhelpful conclusions and undermine professional and person-centred approaches.

As public and other services move increasingly online, being digitally excluded is a growing barrier to everyday life and is especially so for those facing housing instability, low income or health challenges. For those living in temporary accommodation, access to private, secure connectivity can be difficult. Many are forced to rely on free public access Wifi in shared public spaces. They may struggle to manage bank or benefit accounts, access health appointments or communicate confidentially with support services.

Digital technology is also changing how landlords let properties and seek to protect their income and property. Landlords with fewer properties face heightened vulnerability, where a single non-paying tenants can result in substantial income loss. In response, landlords increasingly prioritise stringent tenant screening to mitigate risks such as rent arrears and property damage. 'Professionals only' advertisement are common on digital platforms.

Estate agents are leveraging technology to augment rather than replace services, including use of digital tenant risk-profiling tools which use algorithms to streamline tenant selection, replacing traditional judgement based methods. Services combine identify verification and credit checks with other data sources to offer comprehensive tenant screening and risk scoring. The adoption of these tools raises questions about their impacts on fairness, discrimination and tenant rights. The tools enable landlords to access financial and administrative data, enhancing tenant selection decisions while streamlining processes. However, digitalisation also exacerbates accessibility barriers, particularly for tenants in non-standard employment, reliant on benefits or with limited digital proficiency.

2. Homelessness and related data

This section is concerned with the types of homelessness in Hillingdon and the number of people and households affected. It considers what types of households are most susceptible to homelessness in Hillingdon and, what causes them to be homeless or threatened with homelessness.

National statutory homelessness statistics published for the 2025 January to March quarter show that the total number of households in temporary accommodation continues to rise and is at record levels for households both with and without children. At the end of March 2025, 131,140 households were living in TA an increase of 11.8% over the previous year, two-thirds (63.4%) of which are households with children.

There have been some improvements. The number of households owed a main homelessness duty fell by 7.9% and accommodation secured at the end of both relief and prevention duties are higher than for the previous two years. The number in non-self-contained B&B also dropped and those in this accommodation for more than 6 weeks also reduced. Section 21 evictions remain a leading cause of homelessness presentations.

In the quarter January to March 2025 the number of households per 1,000 in the area threatened with homelessness was 2.86 in London compared with 1.71 for the Rest of England. The following number per 1,000 were recorded for West London Boroughs.

West London Borough	Threatened with homelessness per 1,000 households
Brent	5.10
Ealing	2.79
Hammersmith and Fulham	2.61
Harrow	1.77
Hounslow	4.16
Hillingdon	4.01
Kensington and Chelsea	2.60

On 31 March 2025, there were 19.9 households living in temporary accommodation per 1,000 households in London, compared to 2.8 households per 1,000 in the Rest of England. Newham had the highest rate in London with 57.7 households per 1,000. The corresponding figure for Hillingdon is **17.7**. Slough Borough Council had the highest rate outside London with 23.8 households per 1,000.

Summary of Statutory Homelessness Data for Hillingdon

	Q1	Q2	Q3	Q4	Total
Initial assessment completed	393	435	688	639	2155
Total households with support needs owed a duty	178	277	463	463	1381
Households owed a prevention duty	154	126	280	168	728
Households owed a relief duty	218	258	393	456	1325
Secured accommodation for 6 months at prevention stage	45	57	66	36	204
- alternative accommodation	16	25	33	23	97
- existing accommodation	29	32	33	13	107
Helped to secure with a financial payment at prevention stage	4	8	14	11	37
Secured accommodation for 6 months at relief stage	48	105	66	60	279
Helped to secure with a financial payment at relief stage	4	13	10	6	33
Number of main duty decisions	172	158	109	90	529
Of which, accepted priority need, unintentional	138	134	90	71	433
- includes dependent children	115	105	61	47	328
Number of main duty ended	10	14	35	15	74

Ethnicity of homeless applicants	Q1		Q2		Q3		Q4		Total	
White	105	28.2%	113	27.6%	169	25.1%	122	19.6%	509	25.1%
Black / African / Caribbean / Black British	74	19.9%	95	23.2%	170	25.3%	193	30.9%	532	24.8%
Asian / Asian British	83	22.3%	91	22.2%	174	25.9%	144	23.1%	492	23.4%
Mixed / Multiple ethnic groups	25	6.7%	15	3.7%	28	4.2%	23	3.7%	91	4.6%
Other ethnic groups	64	17.2%	79	19.3%	105	15.6%	113	18.1%	361	17.6%
Not known	21	5.6%	16	3.9%	27	4.0%	29	4.6%	93	4.6%

In 2024/25, the ethnic profile of homeless applicants in Hillingdon shows notable disparities when compared to the borough's overall population based on the 2021 Census¹⁰. White residents, who make up around 48.2% of Hillingdon's population, accounted for only 25.1% of homeless

¹⁰ [How life has changed in Hillingdon: Census 2021](#)

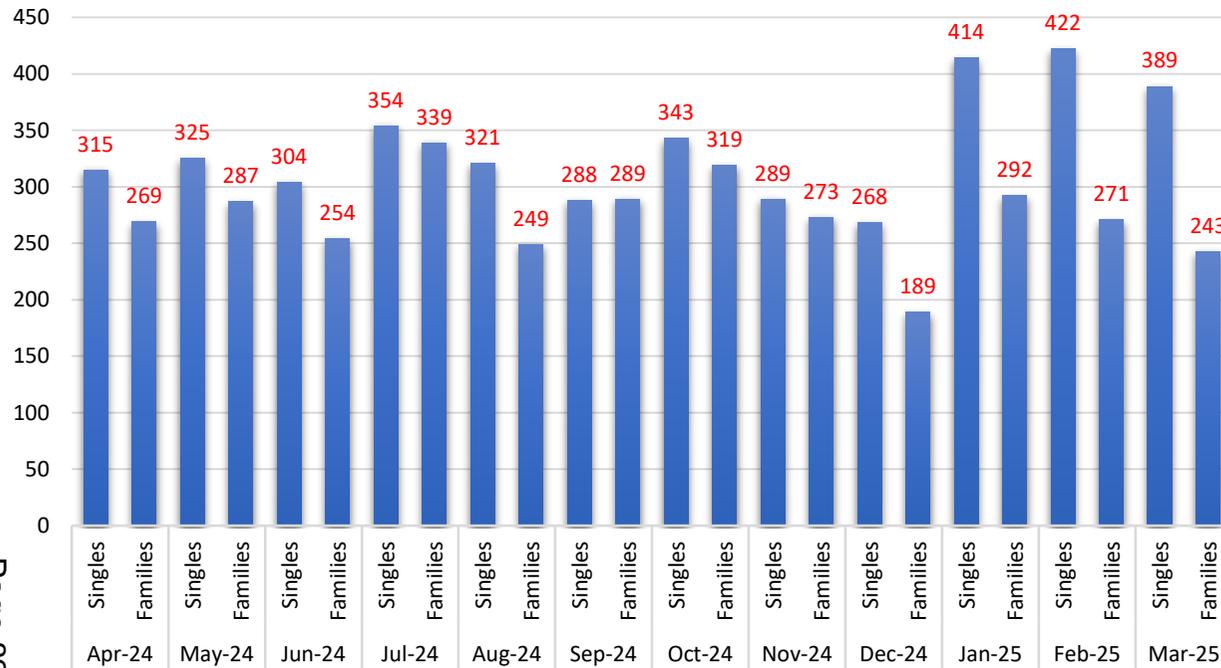
applicants, indicating significant underrepresentation. Conversely, Black / African / Caribbean / Black British individuals represented 24.8% of homeless applicants, despite comprising just 7.8% of the general population—highlighting a substantial overrepresentation. Asian / Asian British residents were also underrepresented, making up 23.4% of homeless applicants compared to 33.3% of the population. Other ethnic groups, including Arab and other unspecified categories, were overrepresented at 17.6% of applicants versus 6.3% of the population. Mixed / Multiple ethnic groups were proportionally represented, with 4.6% of applicants compared to 4.4% of the population. These figures suggest that homelessness in Hillingdon disproportionately affects certain ethnic minority groups, particularly Black and Other ethnic communities.

Homeless Approaches

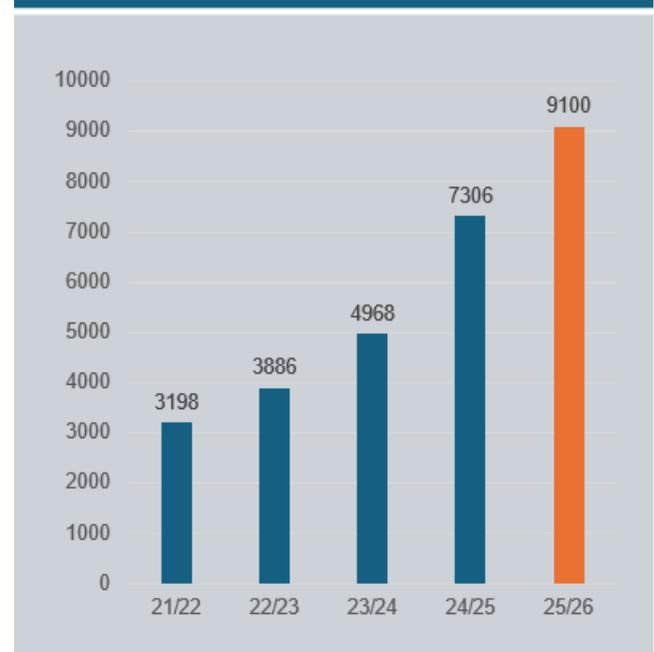
In the fiscal year 2024/25, Hillingdon Council experienced a significant increase of 47% in homelessness approaches over the previous year, which was itself an increase of 28% over the year before that. Single-person households constituted 55% of these cases. This is a reduction from 66% the year before.

In 2024/25, the total number of homelessness approaches received by the local authority rose significantly to **7,306**, compared with **4,968** in 2023/24 and **3,886** in the preceding year. This upward trend is expected to continue over the coming year. The pattern of two-thirds of approaches originating from single-person households remained consistent with previous years. Of the total, **4,032** approaches were from single individuals, while **3,274** were from households with families. This upward trend is expected to continue into 2025/26.

Homeless Approaches 2024/25

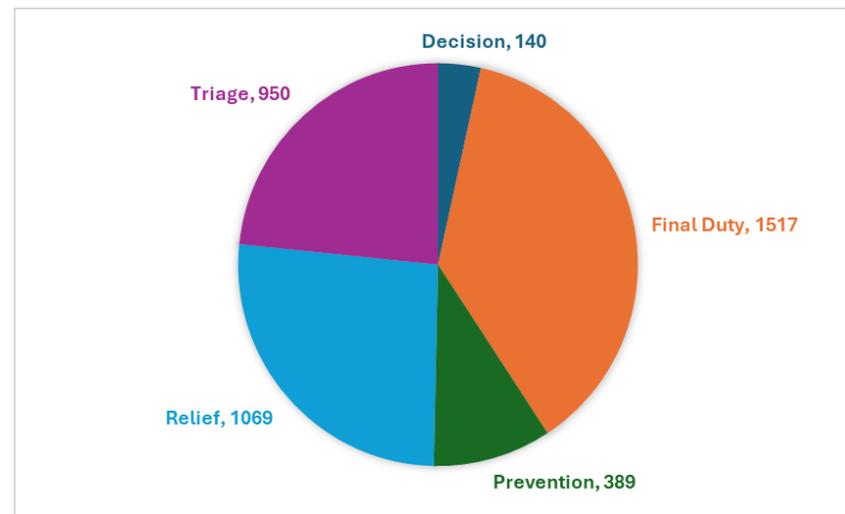
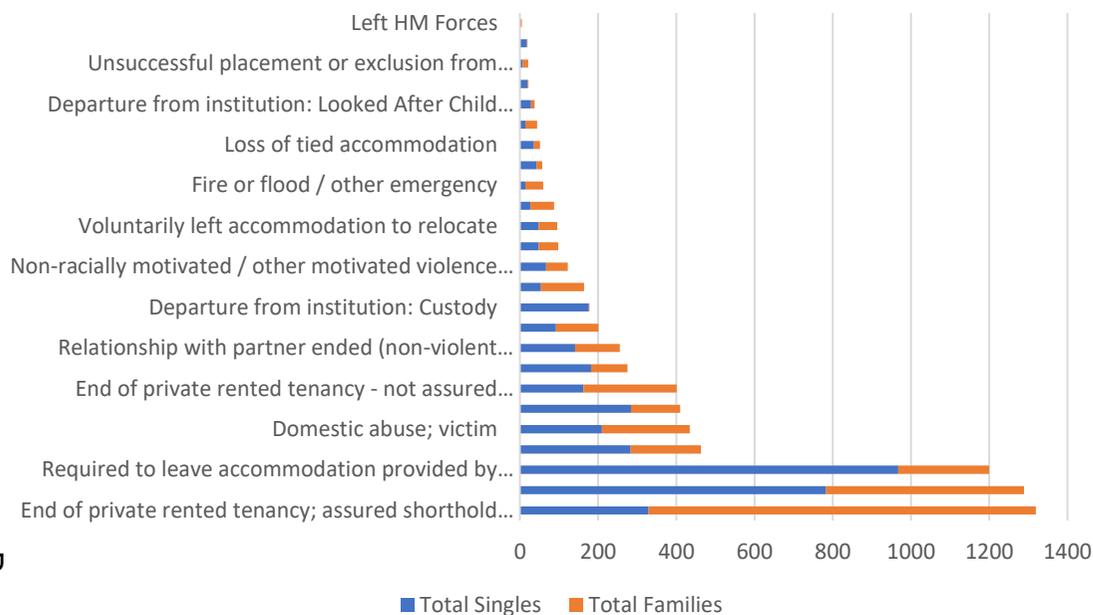


Approaches



Homeless approaches in Hillingdon remained consistently high throughout 2024/25, with notable fluctuations. Singles accounted for the majority of approaches each month, peaking sharply in January 2025 at 414 cases, while families reached their highest point in February at 422 cases. The winter period (December–February) saw a significant surge compared to earlier months, suggesting seasonal pressures and possibly clearance of court backlog driving demand. Overall, the trend indicates sustained and rising pressure on homelessness services, with single households consistently forming the largest cohort, though family approaches also spiked during the year.

Approach Reasons 2024/25



The chart highlights the main reasons for homelessness approaches in Hillingdon during 2024/25. The two dominant causes are end of private rented tenancy (assured shorthold) and requirement to leave Home Office-provided accommodation, together accounting for the largest share of cases. Both reasons affect families more than singles, with family approaches for assured shorthold tenancy terminations exceeding 1,200 cases, compared to around 330 for singles. Conversely, leaving Home Office accommodation disproportionately impacts singles, with nearly 970 cases, compared to 233 for families. Other significant factors include domestic abuse, relationship breakdown, and eviction from supported housing, though these are far less frequent. This pattern underscores the dual pressures of private rental insecurity and asylum dispersal policies as key drivers of homelessness demand, alongside persistent issues such as domestic abuse and institutional discharge.

HOMELESS APPROACHES 2024/25	Total Singles	Total Families	Overall Total
Friends/Family no longer willing or able to accommodate	1067	632	1699
End of private rented tenancy; assured shorthold tenancy	329	990	1319
Required to leave accommodation provided by Home Office as asylum support	967	233	1200
Eviction from supported housing	283	180	463
Domestic abuse; victim	210	224	434
End of private rented tenancy - not assured shorthold tenancy	162	239	401
Not known due to last settled accommodation Not known	182	93	275
Relationship with partner ended (non-violent breakdown)	141	114	255
Home no longer suitable due to disability / ill health	92	109	201
Departure from institution: Custody	176	2	178
Mortgage repossession or sale of owner occupier property	54	110	164
Non-racially motivated / other motivated violence or harassment	67	55	122
End of social rented tenancy	48	50	98
Voluntarily left accommodation to relocate	48	47	95
Property disrepair (Inhabitable)	27	60	87
Fire or flood / other emergency	14	45	59
Domestic abuse; alleged perpetrator excluded from property	42	15	57
Loss of tied accommodation	36	15	51
Racially motivated violence or harassment	14	30	44
Departure from institution: Looked After Child Placement	28	9	37
Departure from institution: Hospital (general or psychiatric)	37	4	41
Unsuccessful placement or exclusion from resettlement scheme/sponsorship	7	14	21
Left HM Forces	1	4	5

to age 18

Youth Homelessness

Analysis of the 2024/25 dataset reveals that the most prevalent reason for homelessness is “**Required to leave accommodation provided by Home Office as asylum support**”, accounting for **279 cases (31.2%)**. This is most commonly associated with applicants previously housed in National Asylum Support Service (NASS) accommodation, refuges, and temporary arrangements. The second most frequent reason is “**Family no longer willing or able to accommodate**”, with **271 cases (30.3%)**, predominantly linked to those living with family or friends. **Domestic abuse** (victim) ranks third, contributing to **53 cases (5.9%)**, with a notable proportion coming from refuge settings and temporary accommodation. These findings highlight the critical intersection between immigration status, family breakdown, and domestic abuse in driving housing instability. The data underscores the need for tailored support pathways for individuals exiting asylum support and those affected by familial or relationship breakdowns. The most common accommodation outcome under both prevention and relief duties was securing self-contained units in the private rented sector, accounting for 0.6% and 3.4% of cases respectively.

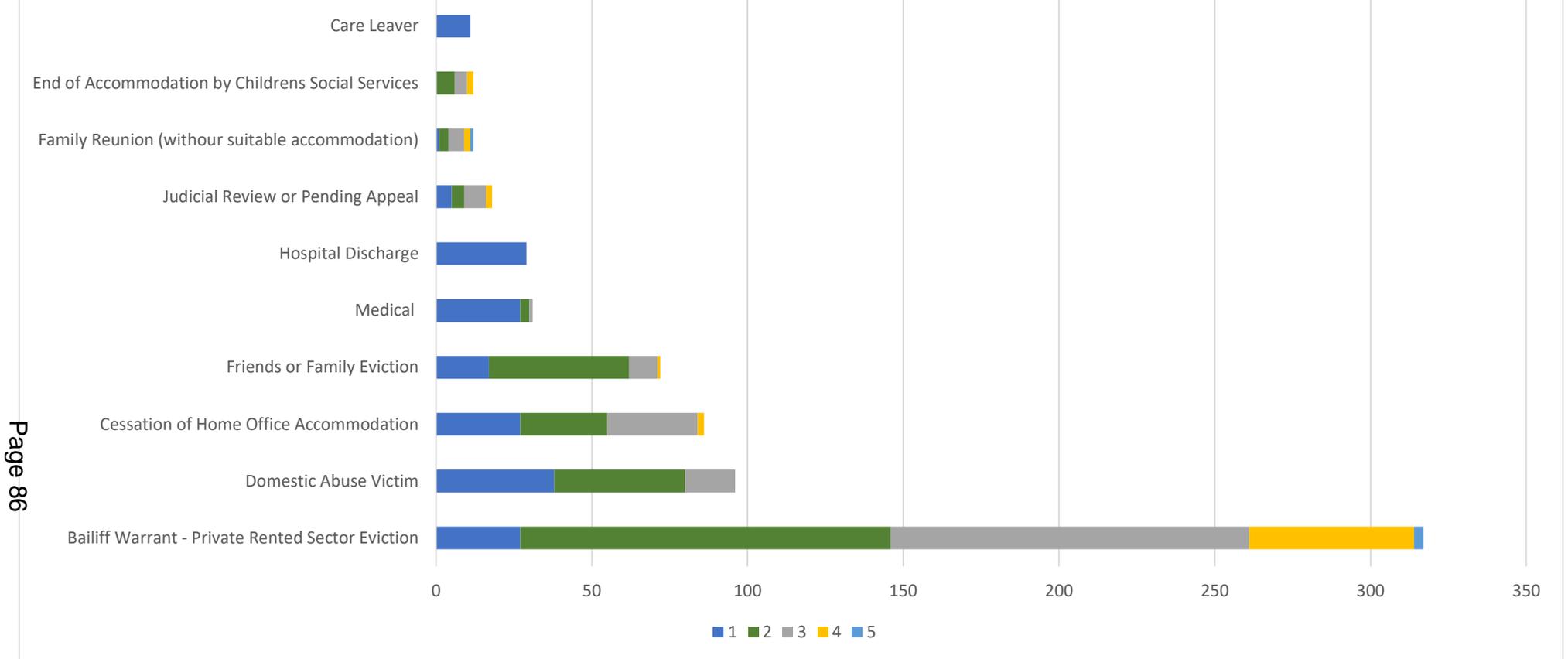
Main reason for loss of settled home (Top 10)	Total
Required to leave accommodation provided by Home Office as asylum support	279
Family no longer willing or able to accommodate	271
Domestic abuse; victim	53
Eviction from supported housing	43
End of private rented tenancy; assured shorthold tenancy	43
Friends no longer willing or able to accommodate	35
Departure from institution: Custody	27
Not known due to last settled accommodation Not known	26
End of private rented tenancy - not assured shorthold tenancy	26
Departure from institution: Looked After Child Placement	17

Temporary Accommodation/B&B

At the close of the 2024/25 period, the count of households residing in temporary accommodation (TA) stood at **1,562**, marking an increase of **415** from the **1147** recorded at the year’s commencement. During 2024/25 there were 740 new bookings into temporary accommodation. This is 58 more than the previous year. On 31 March 2025 the number of households in high cost B&B was 796 which is an increase of 18.3% over two years.

Throughout the 2024/25 year, the **B&B** bookings distributed as follows: **206** for one-bedroom (-15 compared to 2023/24), **267** for two-bedroom (+20), **199** for three-bedroom (+40), **64** for four-bedroom (-8), and **4** for accommodations larger than four bedrooms (-1).

Top 10 Booking Reasons by Bed Size



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Private rented sector evictions via bailiff warrants dominate, accounting for the largest share of bookings across all bed sizes, particularly for larger homes (3–4 bedrooms), where this reason represents the overwhelming majority. Domestic abuse and cessation of Home Office accommodation are the next most common causes, with a more even distribution across smaller bed sizes (1–2 bedrooms). Other reasons such as friends or family eviction, hospital discharge, and medical needs appear less frequently and are concentrated in smaller properties. This pattern highlights that eviction from the private rented sector is the primary driver of high-cost temporary accommodation, especially for families requiring larger homes, while single-person households are more likely to enter TA due to domestic abuse or health-related issues.

Reason	1B	2B	3B	4B	5B	Total	% of Approaches	% of all bookings
Bailiff Warrant - Private Rented Sector Eviction	27	119	115	53	3	317	24%	43%
Domestic Abuse Victim	38	42	16			96	22%	13%
Cessation of Home Office Accommodation	27	28	29	2		86	7%	12%
Friends or Family Eviction	17	45	9	1	0	72	4%	10%
Medical	27	3	1			31	15%	4%
Hospital Discharge	29					29	71%	4%
Judicial Review or Pending Appeal	5	4	7	2	0	18	-	2%
Family Reunion (without suitable accommodation)	1	3	5	2	1	12		2%
End of Accommodation by Children's Social Services (S17) / Eviction from supported living	4	10	4	2		20	4%	3%
Care Leaver	11					11	30%	1%
Rough Sleeper	8	1				9	3%	1%
Victim of Civil Unrest - Chagos Islands		5	3			8		1%
Prison Release	6					6	3%	1%
Regeneration Scheme		2	4			6		1%
Victim of Civil Unrest - Lebanon	1		3	1		5		1%
Illegal Eviction	2		1			3		0%
Fire	1	1				2	3%	0%
Relationship Breakdown	1	1				2	1%	0%
Accepted Main Housing Duty		1	1			2		0%
Victim of Civil Unrest - Sudan			1	1		2		0%
Modern Trafficking Victim	1					1		0%
Referral by Local Authority under S198		1				1		0%
Unsuitable Housing		1				1	1%	0%
	206	267	199	64	4	740		100%

Private sector evictions are by far the most prominent reason for bookings into nightly paid accommodation, especially for larger homes - 58% of bookings for families requiring 3 bedrooms and 82% of bookings for those requiring 4 bedrooms or more. One bed bookings are much more evenly split between private sector evictions, domestic abuse, cessation of home office accommodation, medical and hospital discharge, with domestic abuse being the most prevalent reason.

Families in need of four or more bedrooms predominantly consisted of households at risk of:

- homelessness under section 21 (56 compared to 42 last year),
- those fleeing domestic violence (zero compared to 11 last year), and
- family reunion (3, not one of the top 3 last year), representing the three primary categories.

In contrast, families in need of three bedrooms largely consisted of:

- households at risk of homelessness under section 21 (115 compared to 83 last year +32),
- asylum seekers whose Home Office-provided housing had ceased (29 compared to 23 last year +6) and
- domestic abuse (16 compared to 8 last year) making up the three primary categories.



Housing Register Analysis

As of 31st March 2025, Hillingdon’s housing register listed **3,194 households** (29% 1 bed need, 34% 2 bed, 26% 3 bed & 11% 4 bed or more). At this time, we were transitioning to a new banding system with bands 1 to 14, 3,112 had been placed on the new banding system as shown in the table below. A further 82 were still to transition.

Housing Register by Band on 31 March 2025						
	0&1 bed	2 beds	3 beds	4 beds	5 beds	Total
Band 1	0	0	1	0	0	1
Band 2	1	1	3	1	0	6
Band 3	5	11	3	0	1	20
Band 4	109	63	12	5	0	191
Band 5	8	1	3	6	0	18
Band 6	14	10	15	5	0	44
Band 7	2	0	2	0	0	4

Band 8	14	5	1	1	0	21
Band 9	25	59	119	97	1	301
Band 10	64	86	91	27	0	268
Band 11	72	270	365	122	0	829
Band 12	305	234	132	23	0	694
Band 13	254	244	163	54	0	715
Band 14	0	0	0	0	0	0
Total 1 to 14	873	984	910	341	2	3112

Of those registered, 895 were homeless households, 819 of which were in the new bands.

Housing Register by Band on 31 March 2025				
	Homeless Main Duty	Homeless Relief	Homeless Prevention	Total
Band 1	0	0	0	0
Band 2	0	0	0	0
Band 3	0	0	0	0
Band 4	0	0	0	0
Band 5	3	0	0	3
Band 6	2	0	0	2
Band 7	1	0	0	1
Band 8	1	0	0	1
Band 9	64	0	2	66
Band 10	68	4	2	74
Band 11	69	0	2	71
Band 12	19	2	4	25
Band 13	534	36	6	576
Band 14	0	0	0	0
Total	761	42	16	819

The proportion on the register for different bedsizes is similar for homeless households and the housing register as a whole. There is a slightly higher proportion requiring 1 and 2 bed properties and slightly lower proportion requiring 3 bed properties.

Housing Register by Homelessness Duty/Beds						
	0&1 bed	2 beds	3 beds	4 beds	5 beds	Total
Homeless Main Duty	211	297	227	95	0	830
Homeless Relief	40	4	2	0	0	46
Homeless Prevention	6	6	6	1	0	19
Total	257	307	235	96	0	895

Housing Register by Transfers/Beds						
	0&1 bed	2 beds	3 beds	4 beds	5 beds	Total
Total	220	276	385	167	2	

Housing Register for Overcrowding for Beds						
	0&1 bed	2 beds	3 beds	4 beds	5 beds	Total
Total	179	446	411	108	0	

Page 6 of 6
Age Bands

Housing Register by Homelessness Duty/Age band							
	16-24	25-44	45-59	60-64	65-74	75+	Total
Homeless Main Duty	66	478	228	27	24	7	830
Homeless Relief	7	18	13	4	3	1	46
Homeless Prevention	0	11	7	0	1	0	19
Total	73	507	248	31	28	8	895

84% of homeless households on the housing register have a main applicant aged between 25 and 59.

The primary cause for registration on the housing list is due to overcrowding, which affects 1144 households (where known), representing 38% of the total registrations with homeless household accounting for 29%. Many homeless cases (84%) fall within the 25 to 59 age group.

Housing Register by Main Reasons	
Overcrowding	1144

No Priority	52
Elderly Sheltered	150
Medical	246
Under Occupation	212
Homeless	876
Unsatisfactory Housing Conditions	11
Social Hardship	0
Management Transfer	49
Leaving Care	13
Release Supported	0
Ex-Service	6
Permanent Decants	8
Statutory overcrowding	282

Among the households experiencing homelessness listed on the housing register, 30% had been registered prior to 2020, compared to 61% of all households on the housing register. Those with a 3 or 4 bed need are more likely to have been waiting since prior to 2020.

Homeless households registered prior to 2020	
Before 2010	68
2010 to 2014	92
2015 to 2019	103
2020 to 2023	108
2024 to present	36

Larger homeless households are more likely to have been on the housing register for a longer period of time.

	Before 2010	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020 to 2023	2024 to present
0 & 1 Bed	17.6	13.6	20.0	16.7	11.8	20.0	15.8	8.3	15.0	17.4	29.4	18.5	38.9
2 Bed	29.4	31.8	15.0	33.3	52.9	20.0	26.3	37.5	35.0	34.8	47.1	54.6	27.8
3 Bed	36.8	36.4	40.0	22.2	23.5	40.0	52.6	45.8	40.0	30.4	5.9	19.4	16.7
4 Bed	16.2	18.2	25.0	27.8	11.8	20.0	5.3	8.3	10.0	17.4	17.6	7.4	16.7
Total	17%	5%	5%	4%	4%	4%	5%	6%	5%	6%	4%	27%	9%

Housing Register Applicant gender		
	Whole register	homeless
Male	1016	328
Female	2173	564
Unknown/other	5	3
Total	3194	895

As with the register as whole, homeless families are more likely to have been registered with a female applicant

While there are some apparent differences in the ethnic breakdown across the housing register as a whole compared to homeless applicants, this is inconclusive because of high numbers where the ethnicity is unknown, especially for homeless households.

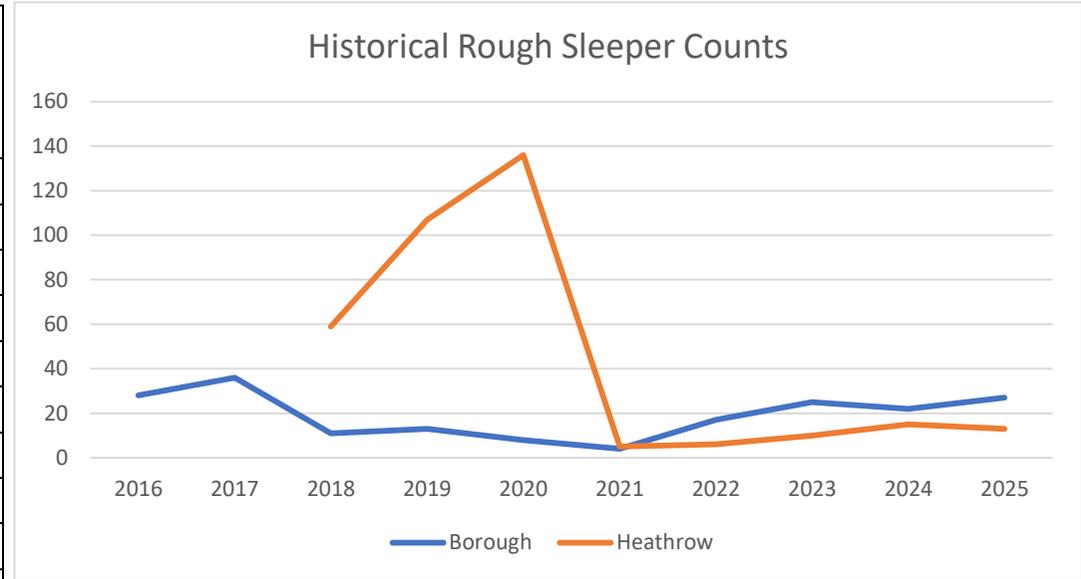
Ethnicity of Homeless Housing Applicants					
	Whole register	Homeless	% Homeless vs Whole Register	Whole Register % by ethnicity	Homeless % by ethnicity
White	1090	166	15.2%	34%	19%
Black/ African/ Caribbean/ Black British	543	117	21.5%	17%	13%
Asian/ Asian British	453	127	28%	14%	14%
Mixed/ Multiple Ethnic groups	91	19	21%	3%	2%
Other Ethnic groups	193	65	37%	6%	7%
Not Known	824	401	49%	26%	45%
Total	3194	895	28%	100%	100%

Rough Sleepers

Annual Rough Sleeper Count

Each autumn an official count is completed and reported to MHCLG. At the most recent count in November 2024 there were 37 people in total recorded for Hillingdon, of which 15 were at Heathrow. This is slightly more than the 2023 count, which recorded 35. We also conduct monthly counts for own purposes, which are recording similar numbers. The highest recorded was in March 2020 when 155 people were recorded. This was just before the 'everyone in' initiative during covid.

Annual Hillingdon Rough Sleepers Count		Nov-2024 Totals	In-Borough Nov 2024	Heathrow Nov 2024	Nov-2025 Totals
Total		37	22	15	40
Sex	Female	6	3	3	7
	Male	31	19	12	33
Nationality	UK	15	12	3	9
	EU	4	2	2	6
	Other non-UK	13	8	5	24
	Not known	5	0	5	1
Age	Under 18	0	0	0	0
	18 to 25	4	3	1	7
	Over 25	26	18	8	32
	Not known	7	1	6	1



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CHAIN Data

Between 1 April 2024 and 31 March 2025, a total of 142 cases were allocated to officers within the Rough Sleepers Team for individuals verified on CHAIN as rough sleepers. Of these, 21 cases involved NASS applicants who later became verified rough sleepers.

The council has a specialist asylum team that works with NASS applicants prior to the Home Office decision on their status and once confirmed works with refugees regarding their housing options.

The following table shows CHAIN data giving the total number of bedded down rough sleepers seen in each of the West London boroughs over the last five years.

Borough	2020/21	2021/22	2022/23	2023/24	2024/25
Brent	374	283	373	455	551
Ealing	624	448	563	710	723
Hammersmith & Fulham	243	214	238	462	439
Harrow	67	58	96	128	94
Heathrow	117	233	233	308	301
Hillingdon	282	140	167	296	492
Hounslow	223	144	196	328	336
RBKC	271	193	199	226	218

In 2024/25, Thames Reach Hillingdon Street Outreach team, has supported 793 individuals who have been bedded down and sleeping rough in Hillingdon. 492 have been seen in Hillingdon borough and 301 at Heathrow airport. Of these, 128 were female and 645 were male. 3 were noted as not known. The number seen bedded down at the airport is 2% lower than in 2023/24, but the number in Hillingdon borough increased by 66%. Anecdotally, the number of rough sleepers made up of asylum seekers/refugees has increased.

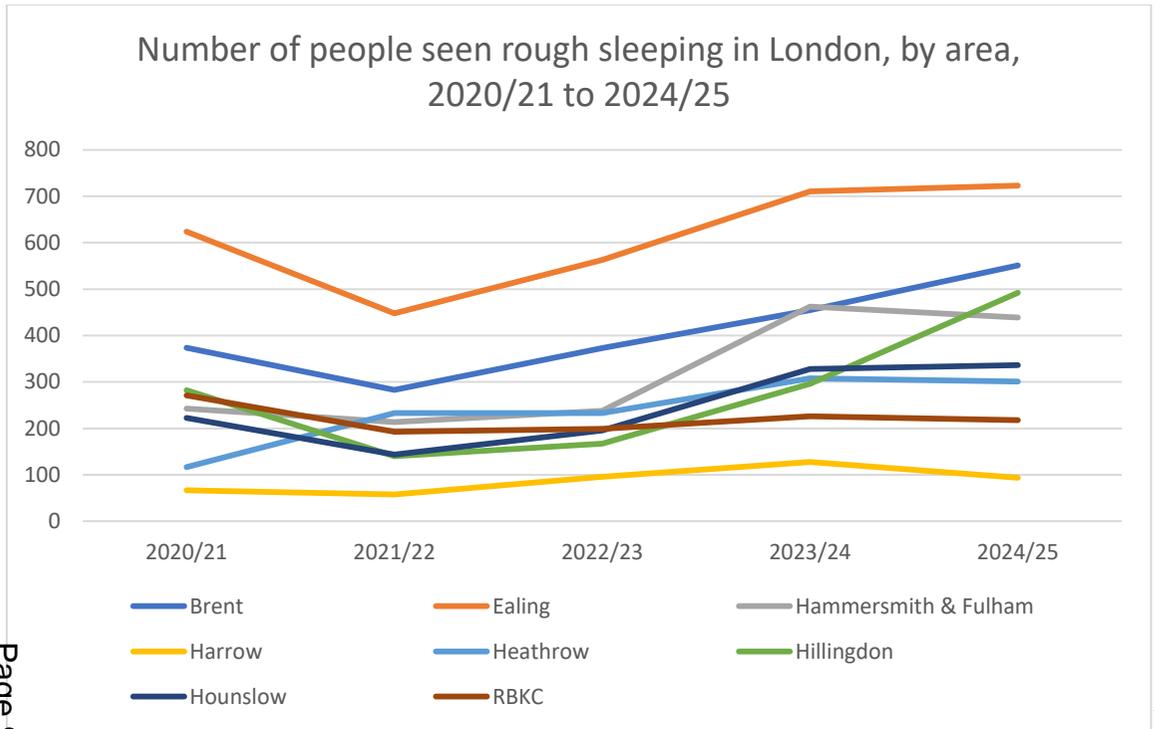
Numbers of rough sleepers have increased quarter by quarter during 2024/25. and numbers are rising. Q1 – 193 Q2 – 205 Q3 – 237 Q4 – 256. Some individuals including our entrenched and complex cohorts are seen bedded down in multiple quarters.

Accommodation outcomes in 2024/25, summarises that without Severe Weather Emergency Protocol (SWEP) placements, Hillingdon SORT supported 300 clients into 399 accommodations, and 348 clients into 521 accommodations when SWEP is included.

There are also rough sleepers that we are unable to place in accommodation due to non-engagement, dis-engagement after national reconnections, international reconnections, and those that we lose touch with and are unable to locate.

The demographic profile, nationalities and reconnections are shaped differently in borough to the airport. There are more UK nationals found in borough, with the Heathrow cohort being more diverse and more likely to need support with reconnection both within the UK to other boroughs or further away, and internationally.

Hillingdon SORT have conducted 237 out of hours shifts during the 24/25 year, alongside other individual targeted outreach, and appointment support that Thames Reach conduct day to day.



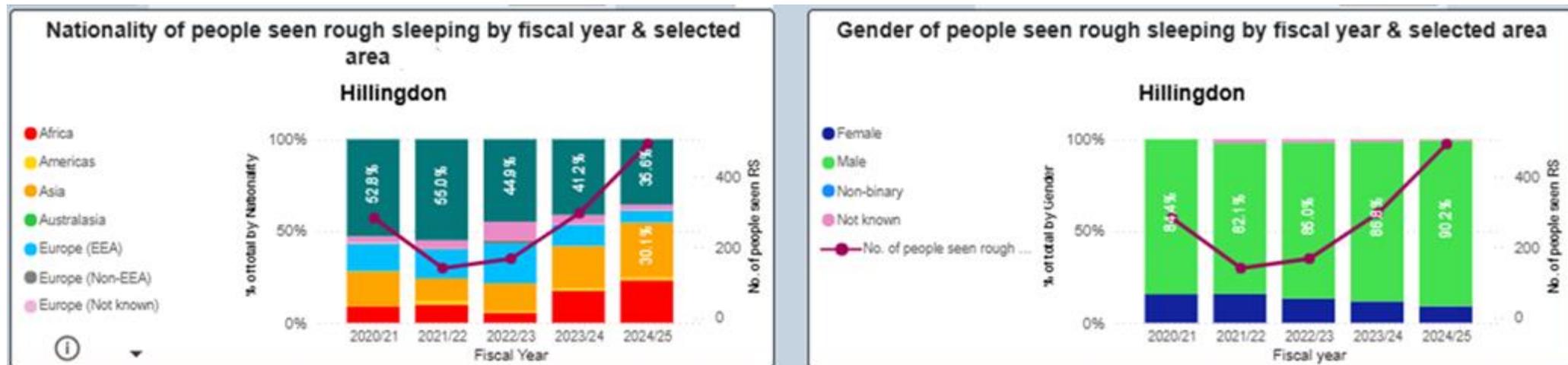
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CHAIN Annual Data

Between 2021/22 and 2024/25, the data on individuals seen rough sleeping in Hillingdon reveals several notable shifts. The proportion of individuals from EEA European countries declined, while those from African nations increased, suggesting a change in the demographic composition of the rough sleeping population. Gender distribution remained predominantly male, though there was a slight rise in cases where gender was not recorded.

¹¹ [Rough sleeping in London \(CHAIN reports\) - London Datastore](#)

Hillingdon CHAIN Data



The 26–35 age group consistently represented the largest cohort, indicating a sustained trend in younger adults experiencing homelessness. Ethnically, individuals identifying as White continued to form the majority, though there was a modest increase in those from mixed ethnic backgrounds. Importantly, the number of individuals seen rough sleeping on multiple occasions rose significantly, highlighting a growing issue of entrenched or repeat homelessness in the borough.

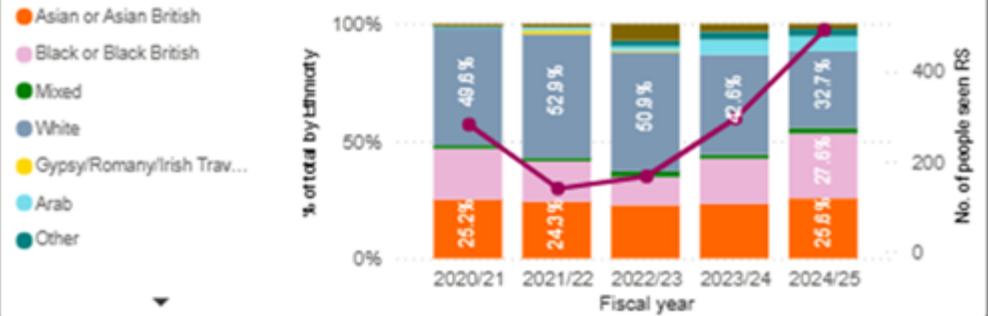
Age group of people seen rough sleeping by fiscal year & selected area

Hillingdon



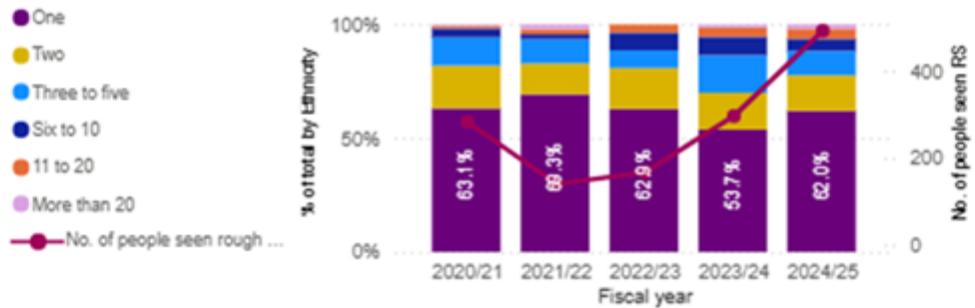
Ethnicity of people seen rough sleeping by fiscal year & selected area

Hillingdon



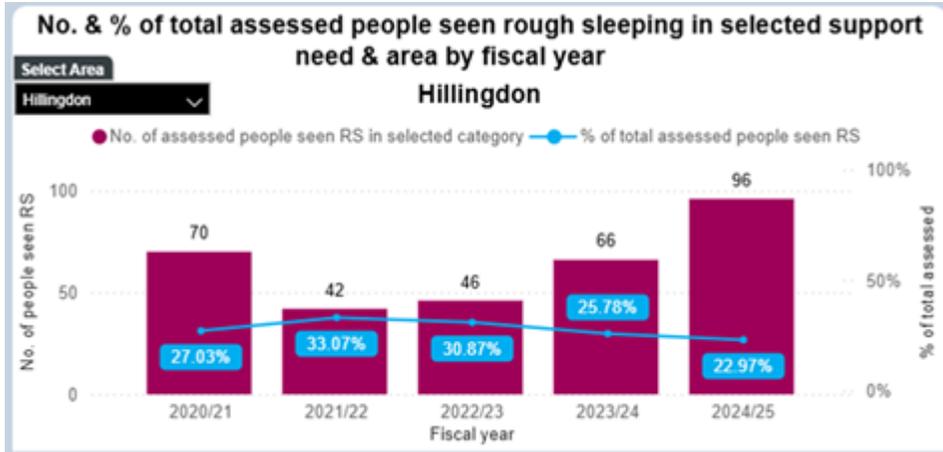
No. of times people were seen rough sleeping by fiscal year & selected area

Hillingdon

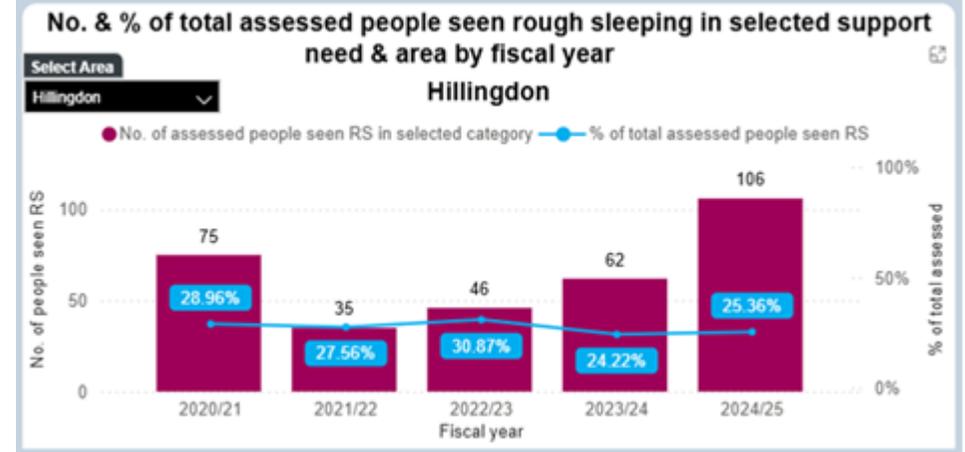


Support Needs of people seen rough sleeping in Hillingdon by fiscal year

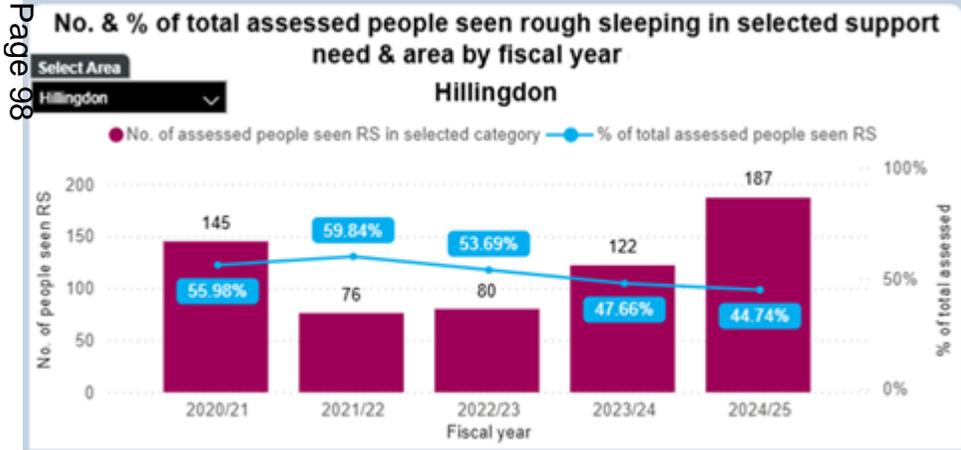
Alcohol



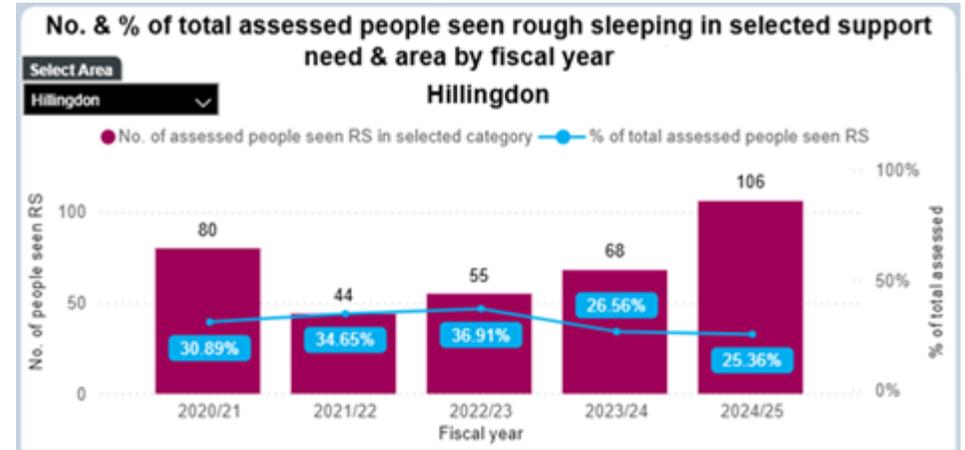
Drugs



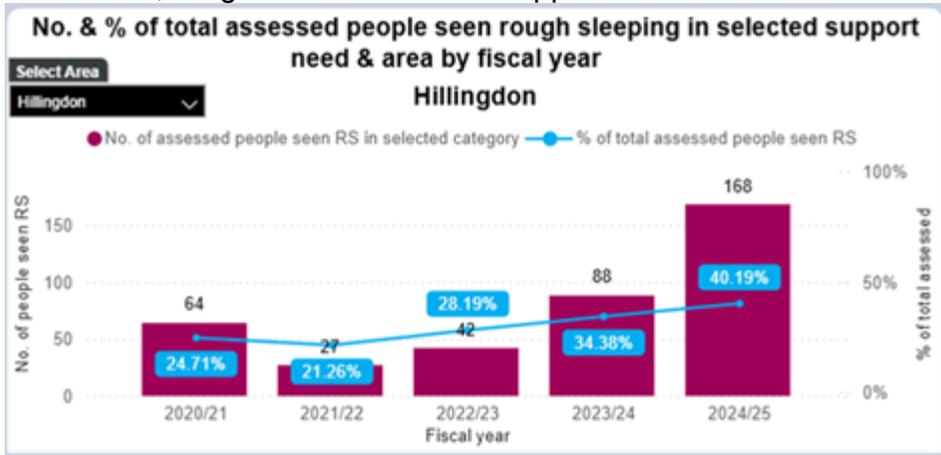
Mental health



More than one of alcohol, drugs and mental health



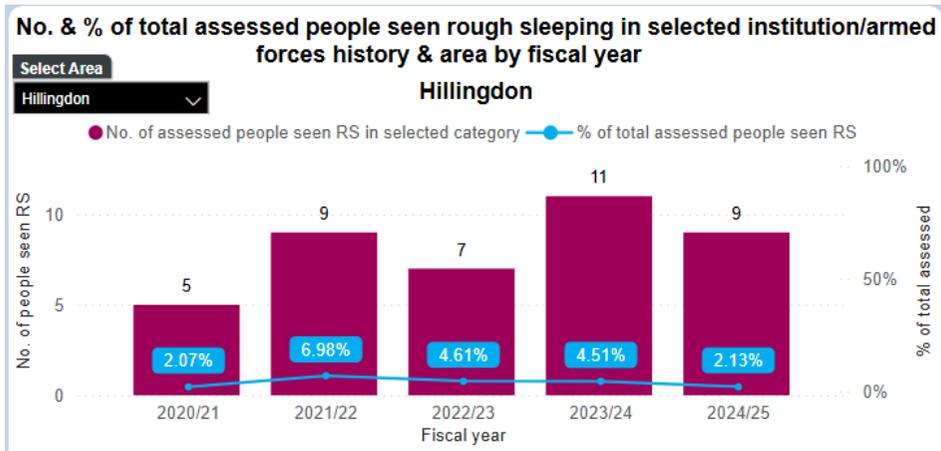
No alcohol, drugs or mental health support needs



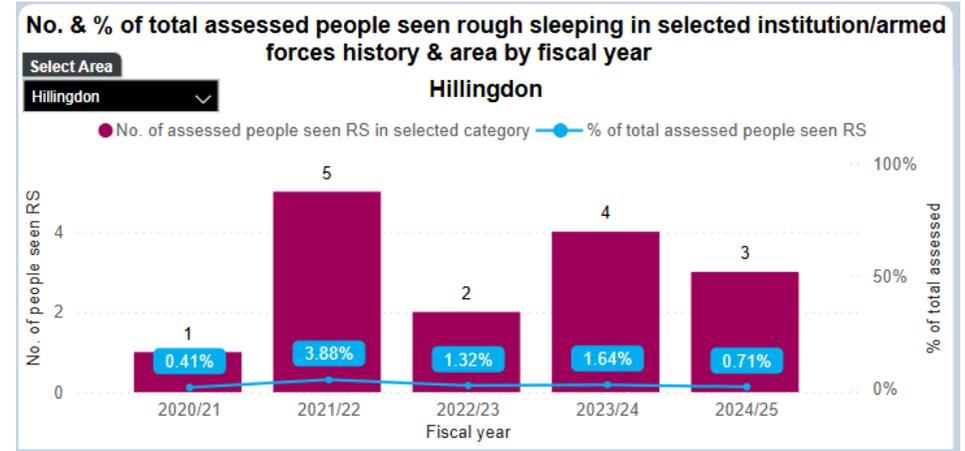
During 2024/25 there were 187 rough sleepers in Hillingdon borough (excluding Heathrow) with a mental health support need, 106 with a drugs related support need and 96 alcohol. There were 106 rough sleepers with more than one support need.

Institutional & Armed Forces history of those seen rough sleeping by fiscal year

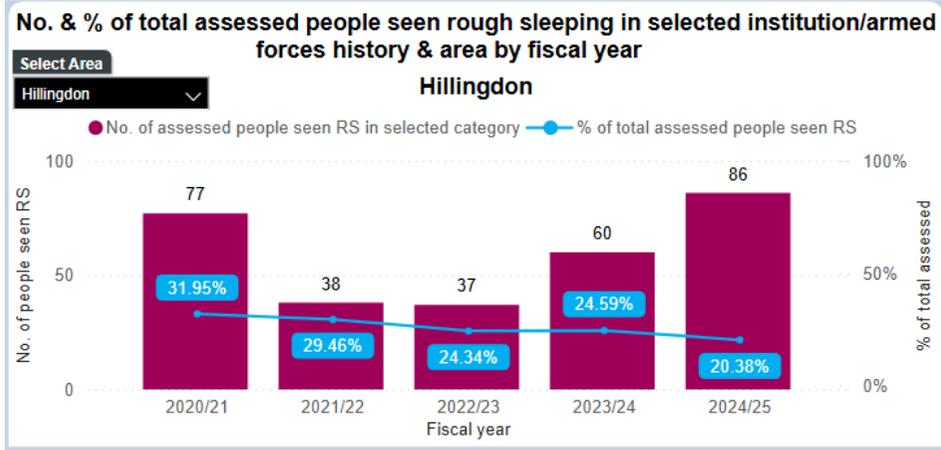
Armed Forces



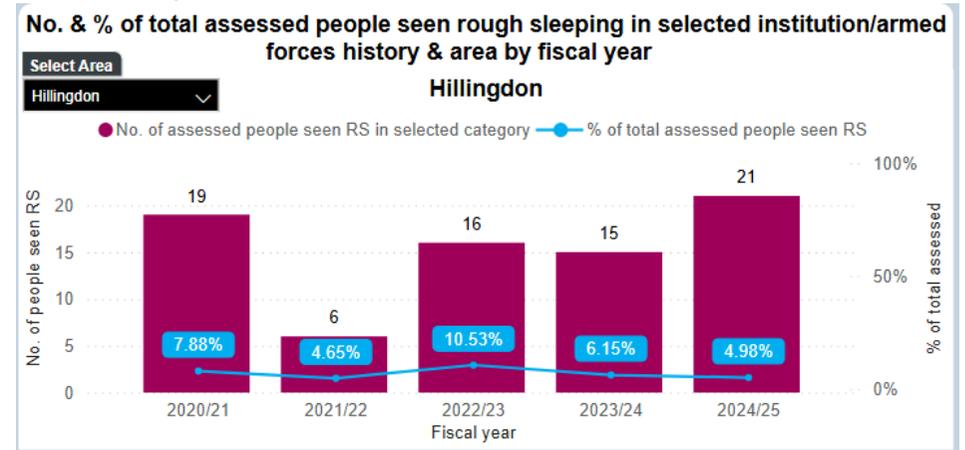
Armed Forces – UK Nationals



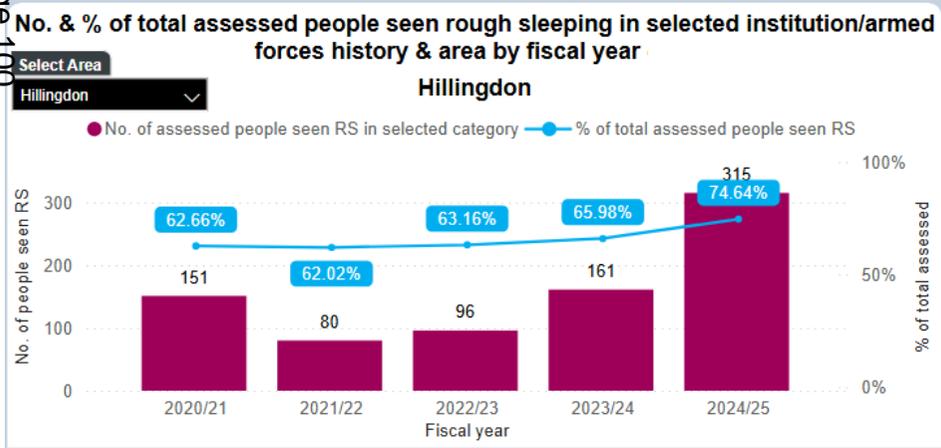
Prison



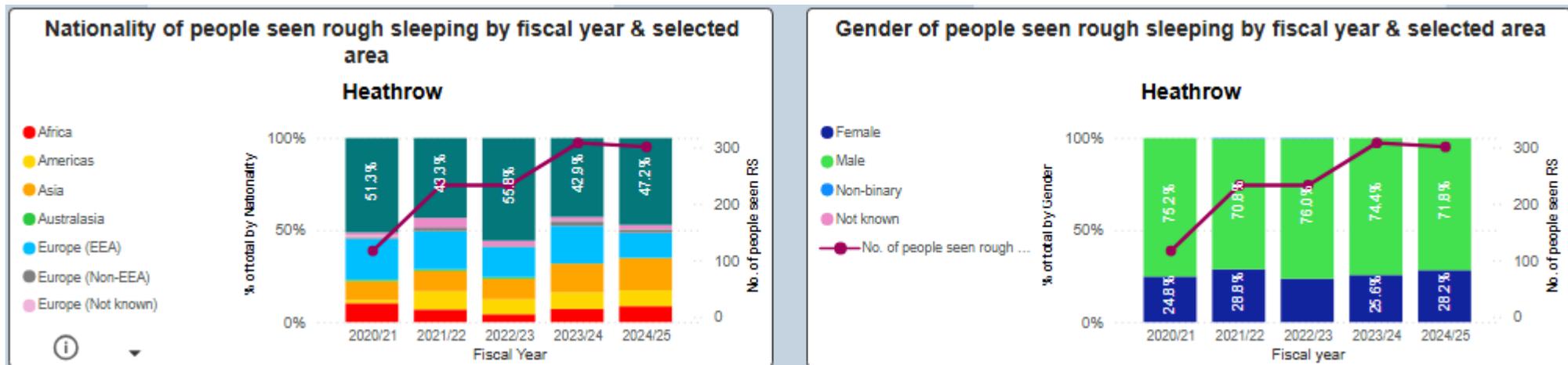
Care history



No Armed Forces, Care or Prison History

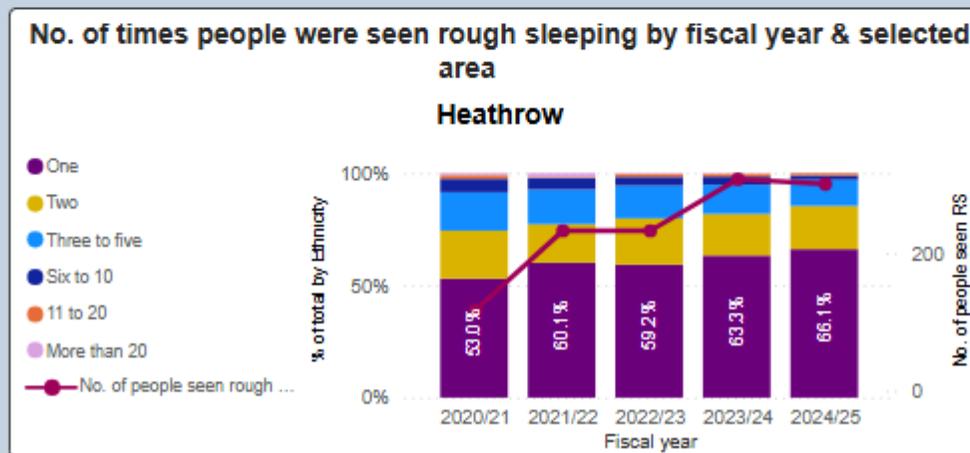
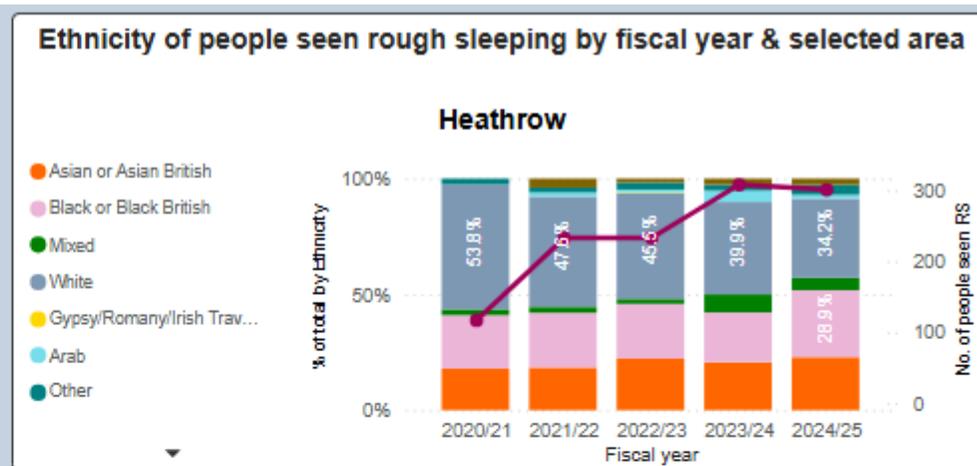
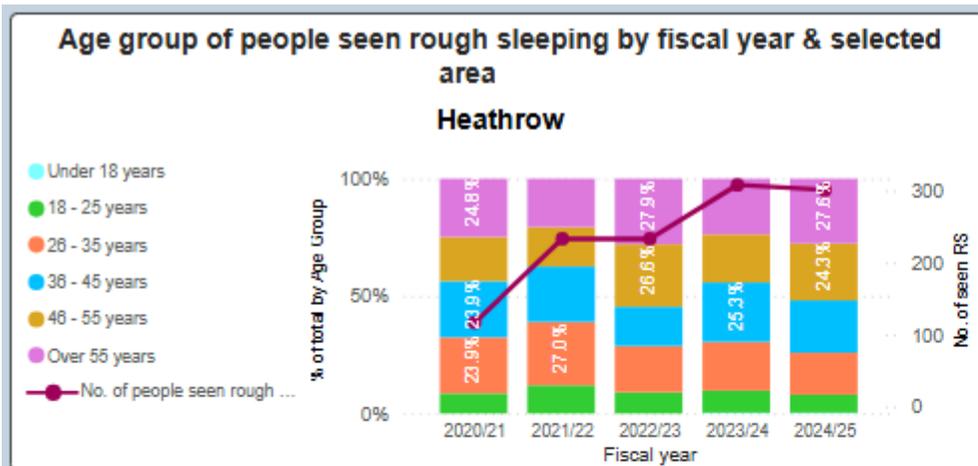


Heathrow CHAIN Data



From 2020/21 to 2024/25 in Heathrow, the majority of rough sleepers were consistently male (around 70–76%) and predominantly of European (EEA) nationality, with their share fluctuating between 42% and 57%. Female representation varied between 23% and 29%, showing no clear trend.

Compared to Hillingdon, Heathrow shows similar patterns in rough sleeping demographics, with European (EEA) nationals and males consistently making up the majority. However, Hillingdon appears to have slightly more variation in nationality distribution year-on-year and a marginally lower proportion of females. Both areas reflect persistent rough sleeping trends dominated by European males, with limited shifts over the five-year period.

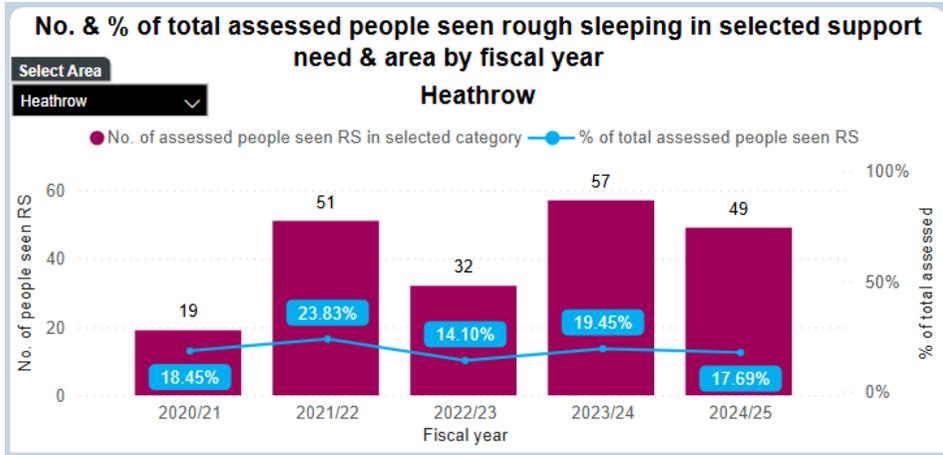


Rough sleeping in Heathrow is most prevalent among individuals aged 26–45 and predominantly among those identifying as White. The frequency chart indicates that most people are seen rough sleeping only once, though a notable minority are seen multiple times. These patterns suggest a recurring but varied population, highlighting the need for targeted interventions based on age, ethnicity, and repeat occurrences.

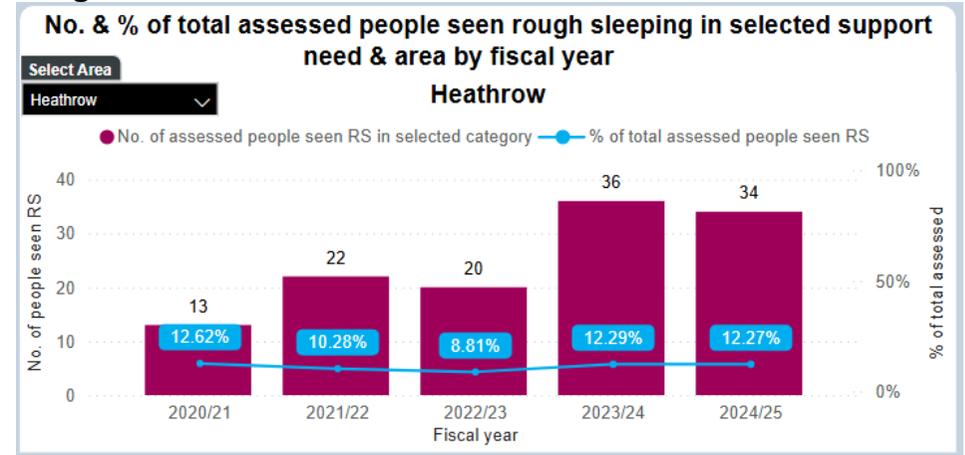
When comparing to in-borough, Heathrow shows a similar age and ethnicity profile among rough sleepers, However, Hillingdon has a slightly higher proportion of individuals seen rough sleeping multiple times, suggesting more entrenched homelessness. These comparisons highlight the need for tailored local responses, with Hillingdon potentially requiring more intensive support for repeat rough sleepers.

Support Needs of people seen rough sleeping in Heathrow by fiscal year

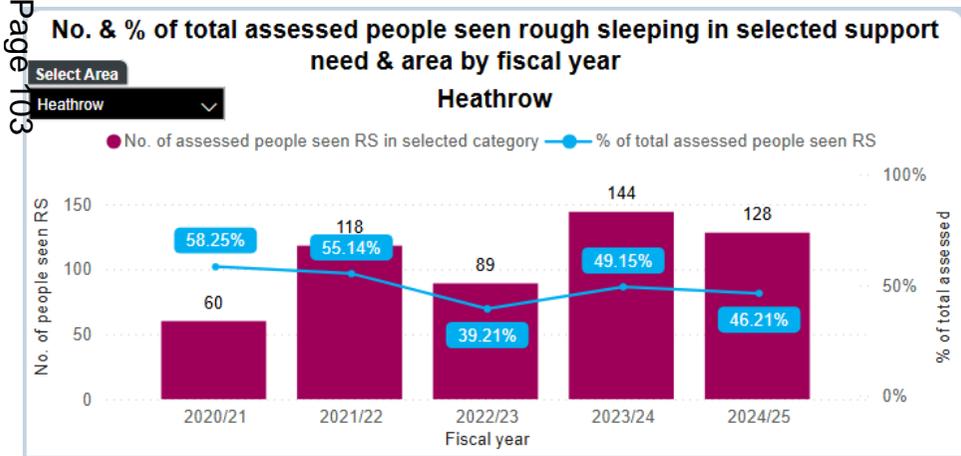
Alcohol



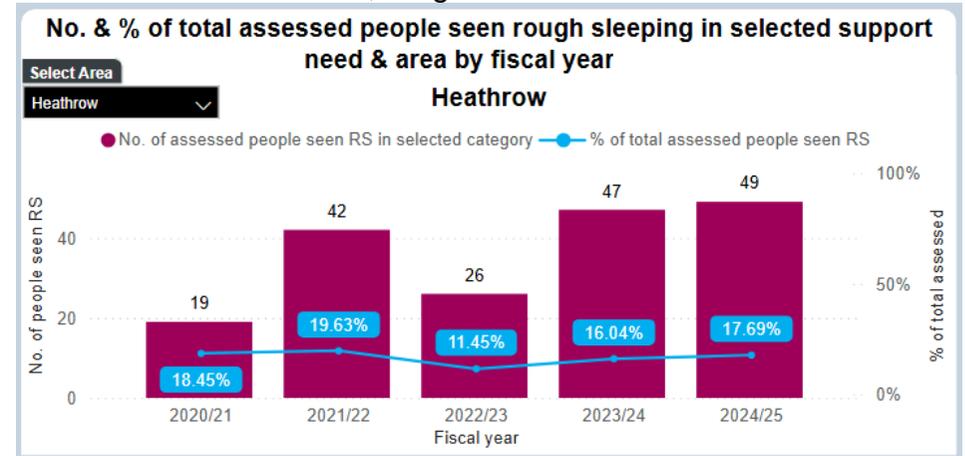
Drugs



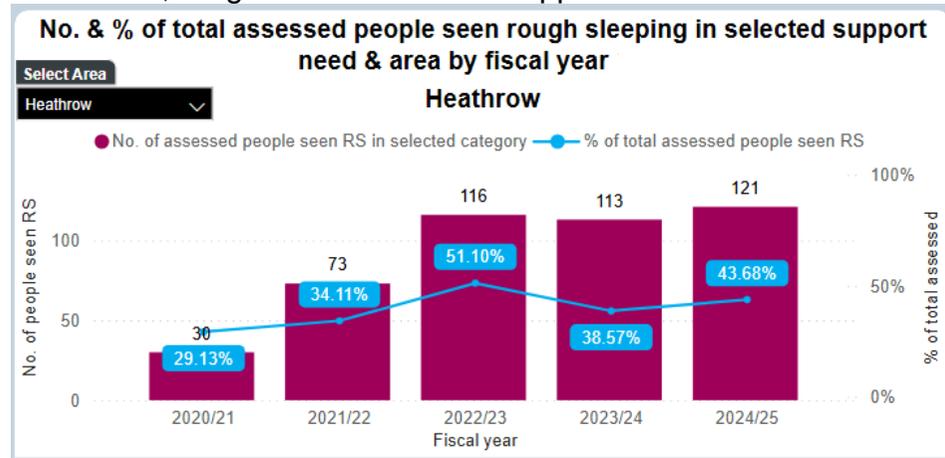
Mental health



More than one of alcohol, drugs and mental health

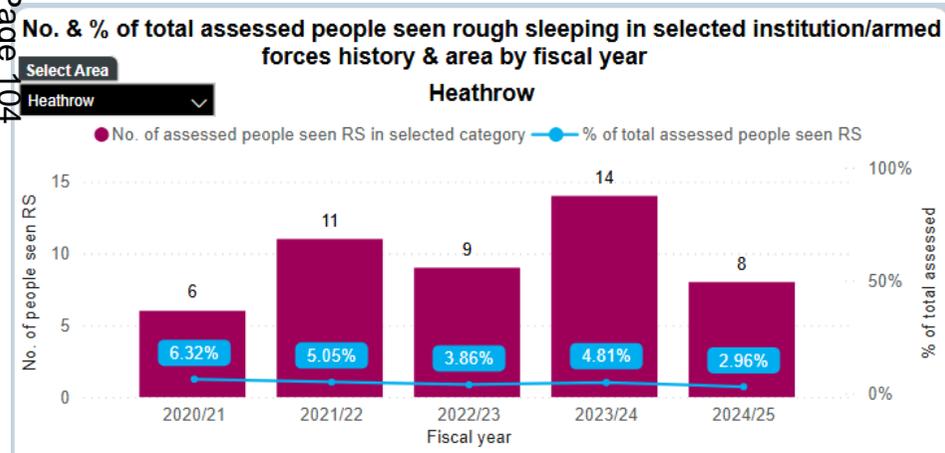


No alcohol, drugs or mental health support needs

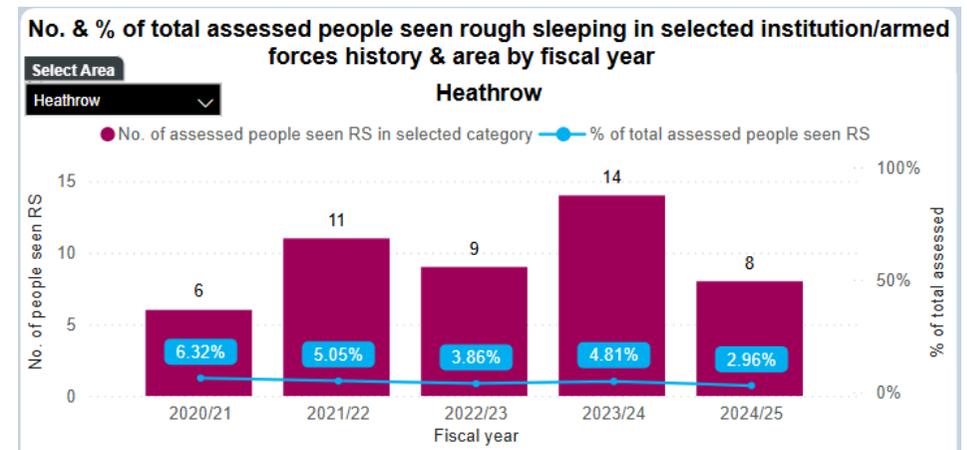


Institutional & Armed Forces history of those seen rough sleeping by fiscal year

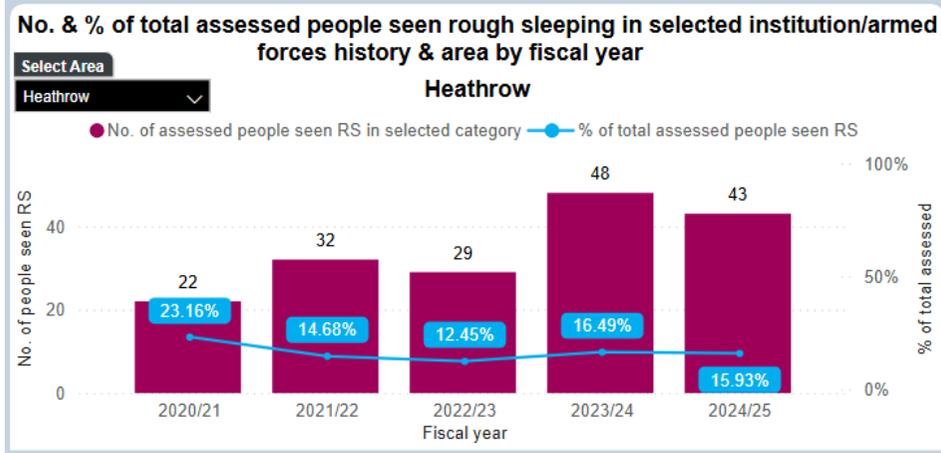
Armed Forces



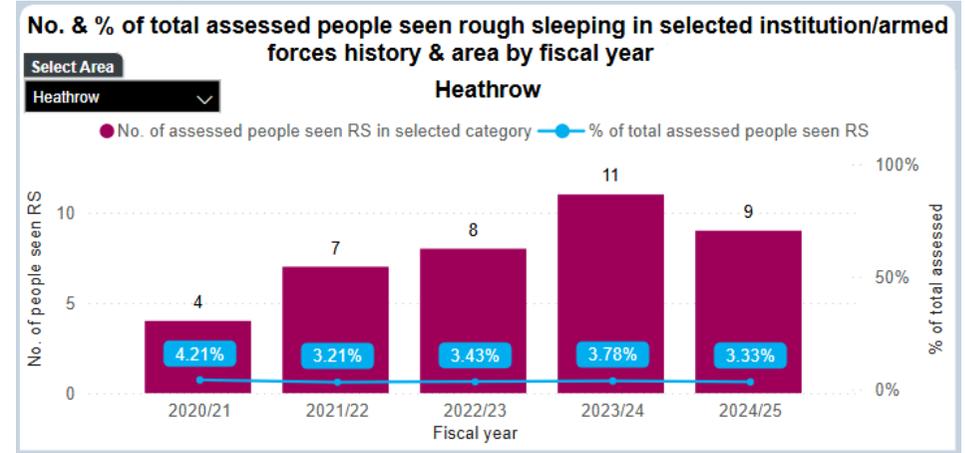
Armed Forces – UK Nationals



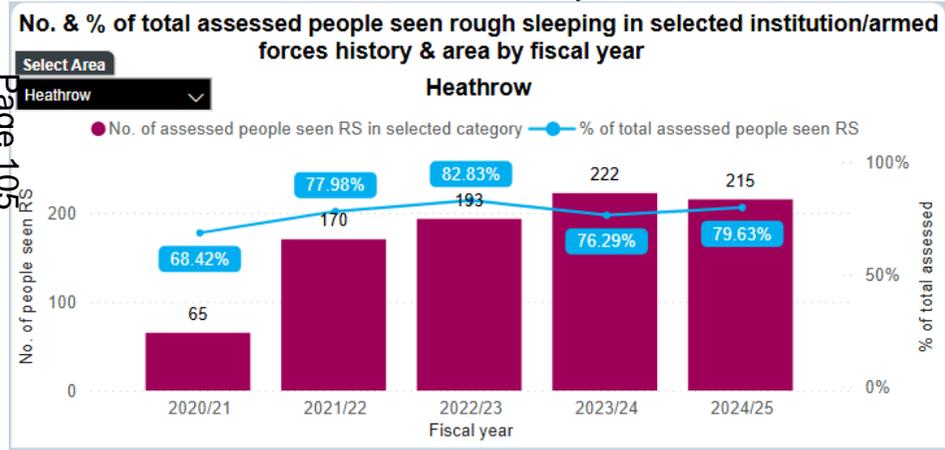
Prison



Care history



No Armed Forces, Care or Prison History



Target Priority Group

The Target Priority Group (TPG) for rough sleepers refers to individuals who are furthest from having their rough sleeping resolved and are unlikely to exit homelessness without a bespoke, multi-agency intervention.

The TPG list has been revised for London boroughs. Eight individuals from the previous cohort have been included in the 2025 revised list. Among the now 19 TPG clients, 10 have been confirmed as rough sleeping within the past month in Hillingdon. Of these, four have been accommodated by the London Borough of Hillingdon. An additional five clients have not been seen as they are bedded down in Ealing and Harrow.

In terms of eligibility, 11 of the 19 clients have full entitlement to public funds and are eligible for housing support. Two of these individuals are already in accommodation. The remaining eight clients have no recourse to public funds; however, two are currently being supported through no recourse bed spaces at Shackleton House in Ealing, enabling continued engagement and the opportunity to work towards more sustainable outcomes.

The cohort consists of 18 males and one female. Ethnic breakdown includes five White British nationals, two White Polish individuals, and ten clients of Asian background—seven from India, one from Pakistan, one from France, and one British Asian. Additionally, two clients are of Black ethnicity, one from Kenya and one from the UK.

Age distribution within the group shows that nine individuals fall within the 26–35 age range, six within the 46–55 range, three within the 36–45 range, and one is aged between 18–25.

Those leaving Home Office accommodation

We have a growing cohort of people facing homelessness and rough sleeping after being evicted from home office accommodation due to receiving positive status decisions. The Home Office has taken action to speed up decision making in order to reduce the use of hotels for housing asylum seekers.

In recent months, the media campaign surrounding the housing of asylum seekers in hotels across the UK; particularly in Hillingdon; has intensified, reflecting growing public concern and political tension. Hillingdon has emerged as a focal point, accommodating approximately 2,238 asylum seekers in contingency hotel accommodation as of the end of March 2025¹². This figure represents the highest concentration of asylum seekers in any London borough and nearly one-tenth of the national total housed in hotels¹³. Most of the asylum population is single people. The borough's

¹² https://consent.yahoo.com/v2/collectConsent?sessionId=3_cc-session_fb28dbae-2264-49f4-a0db-9cc7b28944ff

¹³ [Hillingdon being asked to take in a 10th of country's refugees | Hillingdon Times](#)

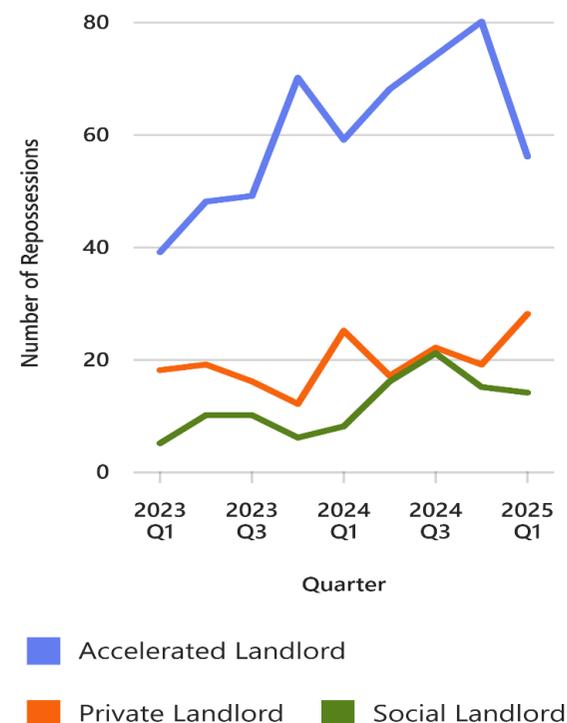
status as a port authority, due to its proximity to Heathrow Airport, has further compounded pressures, with a significant number of arrivals - including families from Chagos Islands seeking support without onward travel plans.

Hillingdon Council has publicly criticised the government's approach, citing inadequate funding and the disproportionate burden placed on local services. The council is currently spending over £5 million annually to support individuals evicted from Home Office accommodation, with the cumulative cost exceeding £16 million¹⁴. Alarming, a growing number of these evicted asylum seekers are becoming street homeless, as the council struggles to meet statutory obligations amid funding shortfalls and rising demand. The situation has prompted calls for a national dispersal strategy and equitable funding to prevent further strain on local resources and to mitigate the risk of entrenched homelessness among vulnerable migrant populations.

Court Action Statistics

	2023				2024				2025	
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2
Accelerated Landlord Repossession	39	48	49	70	59	68	74	80	56	60
Private Landlord Repossession	18	19	16	12	25	17	22	19	28	26
Social Landlord Repossession	5	10	10	6	8	16	21	15	14	11
Mortgage Repossession	2	2	3	4	5	1	6	1	6	4

The chart illustrates a clear upward trend in repossessions across all landlord types from Q1 2023 to Q1 2025. Accelerated landlord repossessions show the most significant increase, peaking in Q4 2024 before a slight decline in early 2025—likely reflecting increased use of Section 21 notices ahead of anticipated legislative changes. Private landlord repossessions fluctuate but rise steadily, possibly linked to affordability pressures and reduced tolerance for arrears. Social landlord repossessions also increase, suggesting growing strain on tenancy sustainment despite support mechanisms. These patterns highlight the need for early intervention, tenancy tracking, and targeted prevention strategies, particularly as the Renters Reform Bill approaches implementation.



¹⁴ [Council calls on government to refund asylum support costs - Hillingdon Council](#)

Private Rental Costs and Local Housing Allowance

LHA vs Average Private Rent (Monthly) – West London Boroughs (July 2024 – June 2025)¹⁵

Borough	1 Bed (LHA / Avg. Rent)	2 Bed (LHA / Avg. Rent)	3 Bed (LHA / Avg. Rent)	4 Bed (LHA / Avg. Rent)
Hillingdon	£997 / £1,221	£1,298 / £1,549	£1,472 / £1,861	£1,794 / £2,582
Ealing	£1,346 / £1,450	£1,621 / £1,750	£1,931 / £2,150	£2,543 / £2,950
Hounslow	£1,298 / £1,400	£1,621 / £1,700	£1,931 / £2,050	£2,543 / £2,850
Brent	£1,346 / £1,500	£1,621 / £1,800	£1,931 / £2,200	£2,543 / £3,000
Harrow	£1,298 / £1,420	£1,621 / £1,720	£1,931 / £2,100	£2,543 / £2,900
Hammersmith & Fulham	£1,346 / £1,750	£1,621 / £2,100	£1,931 / £2,600	£2,543 / £3,500

LHA rates are based on the 30th percentile of rents in each Broad Rental Market Area (BRMA), while average rents reflect median private sector rents from ONS/GLA data (July 2024–June 2025). Figures are rounded for clarity.

Homelessness demand

This section is concerned with understanding the level of homelessness demand during 2025/26 and later years

Both homelessness approaches and the numbers of homeless households requiring temporary accommodation have increased between 2023/24 and 2024/25 and our expectation is that there will be a further estimated 10% increase in the number of bookings into temporary accommodation during 2025/26.

Our homelessness demand is made up of:

- The number of households residing in temporary accommodation, particularly those in nightly paid accommodation.
- New bookings into temporary accommodation minus those moving on from temporary accommodation for reasons other than rehousing.
- Temporary accommodation admissions avoided through rehousing at the prevention stage or a payment made to retain the existing home.

Our priority is to eliminate the use of nightly paid accommodation. The temporary accommodation portfolio is transitioning to a mixture of council owned HRA properties used as temporary accommodation and private sector long term leased properties also held in the HRA.

¹⁵ [Private rental market in London: July 2024 to June 2025 - Office for National Statistics](#)
[London rents map | London City Hall](#)

At the beginning of 2025/26 we had in the region of one and half thousand homeless household in temporary accommodation, of which around 800 were in nightly paid accommodation – 18% 1 bed, 35% 2 bed, 33% 3 bed and 14% 4 bed.

The flow of households into nightly paid accommodation during 2024/25 was 740 households – 206 x 1 bed, 267 x 2 bed, 199 x 3 bed and 68 x 4 bed. For the first five months of 2025/26 there have been an average of 55 bookings per month into nightly paid accommodation. The estimate for 2026/27 is 741 bookings. To remove the need for nightly paid accommodation and keep pace with homelessness demand, it is estimated that we will need to source accommodation placements for around 628 of these bookings as some will make their own arrangements. We will also need find alternative accommodation for the 800+ households currently in nightly paid temporary accommodation.

A focus on prevention aims to hold demand at as low level as possible, but there are numerous factors influencing demand many of which are beyond the control of the council.

3. Homelessness Resources

The Ministry for Housing, Communities and Local Government (MHCLG) provide Homelessness and Rough Sleeping grant funding. For 2025/26 the original provision was £7,884,575 for 2025/26. Within this the previously separate funding streams for the Rough Sleeping Initiative and the Accommodation for Ex Offenders grants were consolidated into a single 2025/26 Rough Sleeping Prevention and Recovery Grant

The breakdown of the allocation across programmes is:

Programme	£ 2025/26
Homeless Prevention Grant 2025/26	£5,197,625
Rough Sleeper Prevention and Recovery Grant	£1,941,407
Rough Sleeping Drug and Alcohol Treatment Grant	£585,543
Emergency Accommodation Reduction Pilots	£160,000
Total	£7,884,575

Homeless Prevention Grant

The Homeless Prevention Grant (HPG) is ringfenced and an additional ringfence has been introduced requiring that 49% of the funding allocation must be spent on prevention, relief and staff activity and cannot be spent on temporary accommodation. HPG is expected to be used to:

- Embed the Homelessness Reduction Act by increasing activity to prevent single homelessness and rough sleeping.

- Reduce the number of families in unsuitable temporary accommodation by maximising family homelessness prevention.
- Reduce the use of bed and breakfast accommodation for families and eliminate family B&B placements beyond the statutory six-week limit.

MHCLG ask that services are designed to focus on achieving the following outcomes:

- **Services are designed to meet local need across family and single homelessness and rough sleeping.** This includes provision targeted at people at highest risk of repeat and enduring homelessness, such as people leaving institutions and care, and the most vulnerable families.
- **Deliver a high-quality service that is accessible to all**, delivering provision that includes face to face engagement for all, and is designed to meet needs of those with additional access or support needs in mind.
- **Homelessness and rough sleeping are prevented**, increasing prevention activities that result in fewer placements in temporary accommodation and fewer people sleeping rough for the first time before accessing services.
- **Homelessness and rough sleeping are brief**, delivering a reduction in:
 - the number of families in unsuitable temporary accommodation and B&B.
 - long stays in temporary accommodation without plans to move on.
 - the number of people sleeping rough in the long-term.
- **Returns to homelessness and rough sleeping are minimalised** through delivering sustainable accommodation and support solutions.

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Rough Sleeping Prevention and Recovery Grant

Within the homelessness and rough sleeping grant funding the previously separate funding streams for the Rough Sleeping Initiative and the Accommodation for Ex Offenders grants were consolidated into a single 2025/26 Rough Sleeping Prevention and Recovery Grant.

Emergency Accommodation Reduction Pilots

Hillingdon received additional funding as one of the Emergency Accommodation Reduction Pilots to reduce B&B usage and explore solutions to improve the overall quality and value-for-money of temporary accommodation. There are no longer any households with children in non-self contained accommodation and consequently none breaking the 6 week limit.

Rough Sleeping Drug and Alcohol Treatment Grant (RSDATG)

RSDATG funds specialist drug and alcohol treatment and support services.

The purpose of the funding is to:

- Improve substance misuse outcomes and recovery for people experiencing or at risk of rough sleeping

- Reduce the numbers of people sleeping rough as a result of substance misuse
- Reduce the number of deaths of people sleeping rough or experiencing homelessness from drug and alcohol poisoning.

The programme is managed by our Public Health team and ARCH are commissioned to provide the service.

Top up Homelessness and Rough Sleeper funding

In August 2025 MHCLG announced additional funding for homelessness and rough sleeping support for 2025/26 in London. For Hillingdon, the Rough Sleeping Prevention and Recovery Grant was increased by a further £465,938. An additional £219,941 was allocated for Supporting Children Experiencing Homelessness and £29,926 for Rough Sleeping Drug and Alcohol Treatment.

There was also further sub-regional Rough Sleeping Prevention and Recovery Grant funding of £3,528,960 for North West London. The London Sub-Regions have a requirement to spend a specified portion of their funding allocation to deliver and add value to partnerships and services with voluntary, community and faith sector organisations in their area.

Additional grant funding programmes

In addition to this core grant funding for homelessness services the council has successfully secured grant funding the following MHCLG and GLA grant funding programmes. Further detail is provided in the section on Housing Supply and Homelessness Support.

- Local Authority Housing Fund (LAHF)
- Rough Sleeping Accommodation Programme (RSAP)
- Single Homeless Accommodation Programme (SHAP)
- Affordable Housing Programme (AHP) 16-23
- Affordable Housing Programme (AHP) 21-26
- Council Homes Acquisitions Programme (CHAP)

Future Homelessness and Rough Sleeping Grant Funding

The rough sleeping funding allocation for 2025/26 reflects a transitional period ahead of the multi-year spending review and homelessness strategy from 2026/27, and is largely a continuation of existing funding. The rough sleeping grants remain ring-fenced for 2025/26 to protect funding to support individuals sleeping rough, at risk of sleeping rough, or at risk of returning to rough sleeping.

4. Prevention of Homelessness

Homelessness services are delivered by our Housing Needs and Homelessness Service with the Residents' Services Directorate. The Homeless Prevention Team provide advice to homeless households and residents threatened with homelessness and make decisions on whether households are owed a homelessness duty. The statutory duty to prevent homelessness sits with the council. The Homelessness Prevention Team carry out assessments in line with the requirements of the HRA and complete Personal Housing Plans designed to prevent a household from becoming homeless.

Hillingdon Council is fortunate in also having some excellent partners working together to combat homelessness and rough sleeping in the borough. A wide range of colleagues across the council, in other statutory services and in voluntary and faith sector partners are involved in supporting those who are homeless or threatened with homelessness. Some have a formalised relationship with the council through commissioned services and/or are in receipt of grant funding via the council.

Within the council, a variety of other services impact on, or are impacted by homelessness services. Important connections include those with other parts of the Housing Service, Community Safety including the Domestic Abuse Team and Private Sector Housing; Social Services, both adults and children's, Youth Justice, Public Health, and Housing Benefits. There are also connections to Employment Support and Planners

A Single Homelessness and Rough Sleepers Groups has been established for key partners to increase our understanding of the causes and impacts of homelessness and rough sleeping in Hillingdon, share information and concerns, manage risks; to influence future activity. The Group includes key partners; Trinity Homeless Projects, Central and North West London NHS Foundation Trust, P3 (Young People's housing advice service), Addiction Recovery Community Hillingdon (ARCH), Heathrow Travel Care, Thames Reach, YMCA, as well as internal housing and social care colleagues.

Prevention homelessness is the responsibility of the Housing Needs and Homelessness Service at the council. The numbers of preventions increased in the latter half of 2024/25. The first two quarters totalled 280 compared to 448 in the last two quarters. The overall number of duties, prevention and relief was also considerably higher in the second half of the year. The proportion owed a prevention duty rather than relief has decreased in each quarter during 2024/25.

	Q1	Q2	Q3	Q4	Total
Total number owed a duty (prevention and relief)	372	384	673	624	2053
% owed a prevention duty	71%	49%	42%	37%	55%

Trinity

Trinity has a longstanding presence in the borough, providing support and accommodation for vulnerable people. Trinity is an important partner for the council in preventing homelessness and providing accommodation and support services.

P3: People, Potential, Possibilities

P3 is a national charity with a mission to improve lives and communities by delivering services for socially excluded and vulnerable people to unlock their potential and open up new possibilities. P3 has also been a longstanding service provider in Hillingdon particularly working with young people.

P3 provide a floating support service which is also aimed at young people. The service engages with other agencies in tackling mental health and substance misuse and assist young people into employment and / or education, including through a Neet to Eat project. At least 2 education road shows are delivered in schools during each school term, targeting schools where there is a greater need for this level of advice.

Homeless Advice Services

The Homeless Prevention Youth Service (Navigator) is for young people aged 18-25 who may be homeless or at risk of homelessness. It is focused on early intervention, prevention and on-going support where needed. The project is based in Yiewsley and the service looks at each case holistically and includes giving information advice and guidance for education, health and training.

	Number of Young People supported	% Male	% BAME	New cases opened	Cases closed	% that had their housing needs met through housing advice or securing accommodation for at least 6 months
Q1 Apr to Jun 24	64	58%	66%	20	27	89%
Q2 Jul to Sep 24	49	59%	73%	24	32	95%
Q3 Oct to Dec 24	66	65%	76%		37	100%
Q4 Jan to Mar 25	68	68%	76%		26	100%
Q1 Apr to Jun 25	68			24	35	

Heathrow Travel Care

Heathrow Travel Care (HTC) is a voluntary sector, crisis social work team based at the airport. Their purpose is to assess, advise and assist anyone in potential difficulty at the airport and this includes working with rough sleepers.

ARCH (Addiction, Recovery, Community, Hillingdon)

ARCH is a local Hillingdon service, based in Uxbridge, providing support for those who have addiction problems. They provide a free and confidential service for those who live or are registered with a GP in Hillingdon. ARCH work with people at any stage of their alcohol or drug difficulties to provide a single point of access to assessment and treatment for problems. Substance misuse and homelessness often come together

when there is social services involvement and a person can no longer stay. Frequently mental health issues are also involved. Drug and alcohol addiction may also be associated with rent arrears, anti-social behaviour and eviction.

Thames Reach

Thames Reach provide outreach services in the borough, including at Heathrow Airport as they do in many other London Boroughs. There are a number of immediate options available to help prevent rough sleeping and this includes referrals to Olympic House and access to No Second Night Out (NSNO). NSNO is a GLA commissioned project that provides emergency shelter at three locations across London. The nearest hubs to Hillingdon are in Hammersmith & Fulham and Islington. If a rough sleeper wants to be supported and there are spaces available, local outreach teams will take the client immediately to one of the hubs.

Once in the Hub, they can stay there for a maximum of three days and in this time the Hub will work with the local authority where the client has a local connection in order to try and provide them with housing options. If a rough sleeper is not eligible, mainly through immigration issues, then other options including re-connection are also looked at.

Domestic Abuse Victims

Support for those suffering domestic abuse includes a domestic abuse refuge run by Refuge and a sanctuary scheme.

The Sanctuary scheme is part of a range of options to help victims of domestic violence to stay in their homes with the support and security they need to feel safe in their home. Under the scheme, security improvements are made to the property and can turn one room into a sanctuary room.

Over the past five years, the London Borough of Hillingdon has seen a notable increase in the number of individuals approaching the local authority as homeless due to domestic abuse. This trend reflects a wider London-wide pattern, where the number of domestic abuse survivors seeking homelessness support has nearly doubled. In Hillingdon, domestic abuse remains one of the leading causes of homelessness presentations, there is a need for continued targeted interventions and multi-agency support. Rising demand continues to place pressure on temporary accommodation and support services. The borough's Independent Domestic Violence Advocacy (IDVA) service plays a critical role in safeguarding victims and facilitating access to safe housing options, though ongoing funding and capacity challenges remain.

A Rapid Evidence Assessment commissioned by the Ministry of Housing, Communities and Local Government (MHCLG) in July 2025 outlines several models currently in use or under development.

- Domestic Violence Transitional Housing: Short-term housing (12–24 months) with financial and emotional support to bridge the gap to permanent accommodation.
- Domestic Violence Housing First: A trauma-informed, needs-led model where mobile advocates help survivors secure long-term housing without requiring engagement with other services first.

The 2025 Housing Regulations introduced a major shift by removing local connection tests for victims of domestic abuse seeking social housing for which the Housing Allocations Policy will be amended. This means survivors can now relocate to safer areas without being penalised by residency requirements, a key barrier previously faced by many.

Additionally, updated statutory guidance encourages local authorities to prioritise domestic abuse survivors in housing allocations and to ensure consistent, trauma-informed responses across services.

The London Domestic Abuse Safe Accommodation Strategy 2025–28 outlines a coordinated city-wide approach, including:

- Investment in new specialist homes.
- Inclusive commissioning practices.
- Support for survivors with insecure immigration status.
- Strengthened multi-agency collaboration

The **Whole Housing Approach**, endorsed by DAHA and the GLA, integrates housing options across tenures to support survivors in maintaining or accessing safe housing. It's adaptable to local needs and increasingly used by councils.

5. Housing Supply and Homelessness Support

A range of accommodation and support is used to meet the needs of homeless households. This includes:

- Social housing lettings to homeless from:
 - existing homes
 - property acquisitions
 - new housing developments and regeneration
 - The number of social lettings for homeless households is dependent on both the overall number of lettings and the relative proportion of lettings for homeless households and others on the housing register
- Private rented sector placements Lower cost temporary accommodation options including use of local authority owned housing and leased accommodation.
- Single homeless supported housing placements
- Nightly paid temporary accommodation is used if another option is not available
- We also work with landlords to enable residents to remain in their existing home and this can involve a financial payment.

Social Housing Lettings

During 2024/25 there were a total of 690 lettings of which **383** were to homeless households.

Lettings to homeless households by Bedsize Need		
	Total on housing register	Homeless on register
1 Bed	55%	40%
2 Bed	27%	39%
3 Bed	12%	13%
4 Bed	6%	8%
Total	100%	100%

The data reveals that the homeless population has a significant need for rehousing, with 383 individuals in total. The highest demand is for 1 bed accommodations, followed by 2 bed, 3 bed, and 4 bed accommodations.

When considering the overall lettings, including the homeless, the number housed is 690 individuals. The highest need is for 1 bed accommodations (256), followed by 2-bed (125), 3-bed (56), and 4-bed (28) accommodations. There are also 225 individuals with unknown bedsize needs which is a concern.

The following breakdown ignores any lettings where the bedsize is unknown and extra care lettings. Just under 65% of 3 bed lettings went to homeless households. A majority of 4 bed lettings (79%) also went to homeless households. In total 32% of all lettings had no associated bedsize.

Rehousing List by Bedsize Need					
	1	2	3	4	Total
Homeless	112	93	36	22	263
Transfer	50	17	10	3	80
General Housing Register	94	15	10	3	122
Total	256	125	56	28	465

The Rehousing List by Bedsize Need indicates that the majority of individuals requiring rehousing are homeless, accounting for 56.56% of the total need (263 out of 465), with the highest demand for single-bed accommodations (256 out of 465, or 55.05%). Transfers and general housing register needs are significantly lower, representing 17.20% and 26.23% of the total respectively.

Affordable housing development and acquisition plans need to take account of demand from other new housing register applicants and those requiring a transfer as well as homelessness applicants. They also need to take account of overall demand for affordable housing as expressed in the Strategic Housing Market Assessment including demand for intermediate as well as social housing.

Property Acquisitions

During 2024/25 there were a total of 228 property acquisitions as detailed in the table below. Some, but not all of these will have been used to house homeless applicants and are included in the social housing lettings above. Madison Brooke was a pilot scheme and a contract has been let for them to purchase a further 200 properties.

		Studio	1 bed	2 bed	3 bed	4 bed+	Total
Acquisitions	Mayors refugee programme	0	0	0	0	1	1
	LAHF3	0	0	0	13	2	15
	SHAP	0	0	10	0	0	10
	Buybacks	0	1	3	19	4	27

Station Approach	0	3	2	1	0	6
HPH3 Millington Road	108	5	0	0	0	113
Bartram Close	0	1	1	0	0	2
Elmgrove Court	0	2	3	1	0	6
2 Little Road	0	0	0	0	1	1
89 Bishops Road	0	0	0	0	1	1
Carpenters Court	0	7	4	1	0	12
Madison Brook	0	1	23	10	0	34
Acquisitions total	108	20	46	45	9	228

LAHF – The council has previously received funding under LAHF 2 for 10 properties. The current LAHF 3 funding runs from 2024/25 to 2025/26 and contributes towards the purchase of 35 dwellings over the 2 years. LAHF3 funding totals £7,908,763, mostly capital funding but including £68,763 revenue.

SHAP funding – SHAP funding has covered the purchase of 10 x 2 bed shared homes for use by young homeless people. Revenue funding will enable the young people to be supported in the accommodation. SHAP revenue funding is £100,000 per year.

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During 2025/26 the expectation is for 300 acquisitions, 200 via Madison Brooke and 100 in house.

The Council's acquisition programme is supported by GLA Council homes acquisition programme (CHAP) Indicative funding secured for 200 purchases.

New housing development and regeneration

		Studio	1 bed	2 bed	3 bed	4 bed+	Total
New build	Petworth Gardens	0	0	0	0	4	4
	Rowan Road	0	0	0	1	0	1
	Maple & Poplar	0	6	27	1	0	34
	Sullivan Crescent	0	0	0	4	2	6
	Atlas Lodge RP placements	0	0	72	0	0	72
	Nestle site RP placements	0	28	22	9	0	59
	New build total		0	34	121	15	6

The Council's affordable housing development programme is supported by GLA Affordable Housing Programme (AHP)

[16-23](#)

Hayes Town Centre
Avondale

[21-26](#)

Falling Lane
Vernon Drive
Hayes Town Centre additional units
Haydon Drive

New Council and Housing Association low cost rented homes scheduled to deliver 2025/26

2025/26		Studio	1 bed	2 bed	3 bed	4 bed	5 Bed	Total
Hayes Town Centre Phase 1	LBH	0	21	28	11	4	0	64
Avondale Phase 1	LBH	0	7	16	5	2	0	30
Midhurst Gardens	LBH	0	0	1	1	0	0	2
Cranford Drive	LBH	0	0	4	0	0	0	4
Juniper Way	LBH	0	0	2	0	0	0	2
Transport House**	LBH	8	4	3	0	0	0	15
Total	LBH	8	32	54	17	6	0	117
Nestle Block B	L&Q	1	29	23 (incl. 13 WC*)	15	0	0	68
Crown Trading Estate	MTVH	0	16 (incl. 1 WC)	6 (incl. 2 WC)	28 (incl. 2 WC)	4	0	54

Total	RP	1	45	29	43	4	0	122
Overall Total	All	9	77	83	60	10	0	239

*WC = Wheelchair accessible

** Temporary Accommodation

New Council and Housing Association low cost rented homes scheduled to deliver 2026/27

2026/27		Studio	1 bed	2 bed	3 bed	4 bed	Total
New Peachey Lane	LBH	0	0	4	2	0	6
Falling Lane	LBH	0	20	23 (incl. 3 WC)	7 (incl. 3 WC)	0	50
Otterfield Social Rent	LBH	0	23 (incl. 4 WC)	11	11	0	45
Total	LBH	0	43	38	20	0	101
1 Vinyl Square	Network	0	22	22	13	0	57
Stanford House	SBHG	0	17	6	7	0	30
Total	RP	0	39	28	20	0	87
Overall Total	All	0	82	66	40	0	188

Approved

Currently approved schemes (July 2025) form a development programme of 1,215 homes profiled to deliver within the next 5 years, subject to funding and further staged approvals

Private Rented Sector

During the 2024/25 financial year, a total of 338 moves into the private rented sector (PRS) were facilitated. Of these, 32 were preventative interventions, enabling residents to remain in their existing homes and avoid homelessness.

The breakdown of property sizes secured through PRS placements is as follows:

- 132 x one-bedroom properties
- 127 x two-bedroom properties
- 62 x three-bedroom properties
- 17 x four-bedroom properties

Single Homeless Supported Accommodation

Trinity

Trinity shared houses

Trinity help to unblock the shortage of housing for single people by making it accessible through creating shared housing in the Private Rented Sector without the need for employment, deposits or credit history. The council has 100% nomination rights to the accommodation.

Private landlords lease their properties to Trinity for five years. The charity assumes all the risk regarding tenancy management, voids, bad debt and general maintenance whilst providing a risk and hassle free income to the landlord.

To access Trinity supported accommodation, single homeless people must be aged 18+ and have a local connection to the borough. Applicants must be suffering from the effects of homelessness and a life dominating problem; have some form of support need which may involve drugs/alcohol misuse, diagnosed or undiagnosed mental health conditions, ex-offenders, rough sleepers or be suffering from the effects of social exclusion.

Individuals remain in accommodation leased by Trinity for at least 12 months and must engage with the Trinity staff through support plans and regular agreed contact which is aimed at assisting the resident to gain independence. Trinity categorise dwellings based on the level of support required as stage one, two or three with stage three being the highest level of support.

Olympic House 2024/25

Olympic House is a 33-bed space hostel based in Hillingdon which provides accommodation for those who are homeless or facing homelessness. It includes 5 EBS (emergency bed spaces) & 5 No Recourse to Public Funds (NRPF). During 2024/25 Olympic House had 12 evictions- this is a mix of duty being ended, and eviction due to behaviour with 87 people moved out and 83 people moved in.

Move-on to:

PRS	31%
Internal Trinity move (supported)	18%
Supported housing	12%
Sheltered	8%
Rehab	6%

Support Needs:

Criminal history	41%
Physical health	52%
Drug and Alcohol	65%
Diagnosed mental health	24%

Not known	8%
Abandoned	2%
Surrendered	2%
Social Housing	3%
Custody	2%
Returned to rough sleeping - case closed	2%
Staying with friends	2%
Moved out of borough	2%
Returned to Olympic	2%

Hospital treatment	12%
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Riverside

Trinity acquired the Riverside Hotel and converted it into 41 self-contained affordable apartments. These units are designed to support low-income households, especially those who have experienced homelessness or social exclusion. The development is part of a move-on accommodation strategy, helping individuals transition from shared housing to independent living.

YMCA

Ventura House in Hayes, Hillingdon, is a supported housing facility operated by the YMCA. It provides short-term accommodation for individuals aged 18–60 who are experiencing homelessness and have low to medium support needs. The facility offers 106 units, including single rooms and family flats, and is staffed 24/7 by a dedicated team of full-time and part-time workers. Residents receive tailored support through keywork systems, monthly action plans, and guidance on life skills, budgeting, training, and emotional wellbeing. Referrals are typically made via Hillingdon Council and other local agencies. The programme aims to help residents rebuild their lives and transition to independent living, with a strong emphasis on social inclusion and personal development. In the year 2024/25 a total of 18 new placements were made which came from direct referrals from London Borough of Hillingdon Homeless Prevention Team.

St Mungo's

In 2024/25, St Mungo's continued its vital work in Hillingdon as part of its broader mission to end homelessness and rebuild lives. The charity focused on supporting individuals experiencing or at risk of homelessness through tailored services that promote recovery, empowerment, and long-term stability. Their outreach teams and supported housing initiatives provided safe accommodation and practical support, including employment services and health care access. In the same year, 75 new former rough sleepers were accommodated under their Somewhere Safe

to Stay provisions with 47 still being supported at the end of March 2025. The Somewhere Safe to Stay provisions is not located in Hillingdon but does provide support and accommodation for a number of our rough sleepers. The West Hub SSTS is located in Kensington and Chelsea with No Second Night Out hostel is in Brent, Hackney, Lewisham and Southwark.

Rough Sleeping Accommodation Programme (RSAP)

RSAP - provides longer-term move-on accommodation for people who have experienced rough sleeping, with integrated support to help them sustain tenancies and progress toward independent living. There are 23 council owned. properties previously purchased with assistance of capital grant funding. RSAP revenue funding is ring fenced for the sole purpose of providing support to people who are recovering from rough sleeping. This funding has been extended to March 2026.

6. Homelessness Challenges and Priorities

Temporary Accommodation (TA) Strategy and Action Plan

Due to the rapid escalation of the number and cost of households in temporary accommodation and the financial risk posed to the Council, a dedicated strategy and action plan was approved by Cabinet in February 2025. Regular monitoring takes place including tracking the following measures.

Measure	Target	Baseline
1.A higher proportion of households whose homelessness is prevented	London Average 54% (based on Oct-Dec 2024)	32%
2.No. families with children/pregnant women in non-self-contained B&B for more than 6 weeks	0	0
3.Fewer households becoming homeless and needing temporary accommodation	50 (per month)	62
4.Fewer households in nightly charged (high cost) temporary accommodation	Zero by 31/03/2026	780
5.Lower overall cost of temporary accommodation (Gross)	Balanced budget by year end (2025/26)	£2,077,960
6.Lower cost per temporary accommodation unit (Gross monthly and per night)	Zero over caps set by bedsize	£70,303 £81.28
7.Implementation of acquisition and new build development programme (LBH)	300 (acquisitions) 100 (new build)	19 15
Fewer households threatened with homelessness (approaches)	600 (monthly)	617
Private rented sector placements	30 (monthly)	
Lettings to homeless households in TA	50 (monthly)	

In March 2025, a MTFs action plan was put in place to operationalise the TA strategy and aims to eliminate the use of the highest cost, nightly paid accommodation. The MTFs action plan has four workstreams to take forward the objectives in the strategy, each with an identified lead officer:

- Workstream 1: Increase prevention and reduce new temporary accommodation placements
 - The key target for workstream 1 is for less than 11 new placements a week into temporary accommodation (no more than 50 per month).

- The high and sustained levels of homelessness demand represent a risk to achieving the prevention targets for this workstream.
- Workstream 2: Increase access to alternative housing options
 - The key target under workstream 2 of the strategy is to secure access to more than 7 new private rented sector properties a week (30 per month), to either prevent homelessness or support the discharge of a homeless duty.
- Workstream 3: Reduce the cost of temporary accommodation
 - Setting of rate caps for different bed sizes of temporary accommodation and negotiations with landlords to step down payments to be within the cap.
 - This workstream included a target to secure an additional 100 leased properties for use as temporary accommodation by March 2026.
- Workstream 4: Increase move-on into social housing
 - The key indicator for this workstream is for a minimum of 11 social housing lettings to be made to homeless households per week (overall 50 per month).

The unsustainable The Temporary Accommodation (TA) Strategy and Action Plan was approved by Cabinet in February 2025 and it was agreed that quarterly updates would be provided to Cabinet, or less frequent as required, and that these would include impact on the Medium-Term Financial Strategy (MTFS).

Residents' Services Select Committee Review: Homeless Prevention and the Customer Journey

During 2024 the Council's Residents' Services Select Committee undertook a major review of the Council's Housing Advice and Homelessness Service, with a particular focus of the residents' journey through the system and experience of customer service. Notwithstanding whom, why and from where people present themselves as homeless, through the review's terms of reference, the Committee's primary aims were to identify ways to improve their experience, better manage their expectations, enhance satisfaction, streamline processes and ultimately provide improved support to prevent homelessness. In undertaking the review, the Committee held several formal in-depth witness sessions, which included representatives from voluntary sector organisations, and experts in homelessness and domestic abuse support, along with relevant Council officers. The Committee was mindful of the need to find cost effective, workable solutions to improve performance going forward. Importantly, the finalisation of the Committee's review benefited from close collaboration between the Chair and Opposition Lead, along with Council officers, in formulating the recommendations presented in this report to ensure they could be consistent with and add value to the direction of travel of the service area. In June 2025 Cabinet accepted and resolved to implement the Select Committee recommendations.

Key findings included:

- The importance of prevention and early intervention in addressing homelessness.
- The need for improved communication and empathy from housing officers.
- The necessity for better systems and technology for case handovers.
- The challenges faced by victims of domestic abuse in accessing housing support.

Select Committee Recommendations

Enhancing Resident Experience

- I. All staff to refer to those applicants who approach the service for help as 'residents' rather than 'customers' or 'clients'.
- II. Create a clearer Residents' Charter: a more accessible guide explaining each stage of the homelessness support process for new applicants, from intake to case closure. This guide will set expectations, reduce confusion, and address common questions. Consider new technologies for instant translation requirements.
- III. Reconfigure the Housing Reception Centre to provide a more welcoming and empathetic environment within existing budget plans.
- IV. Continue unannounced random checks/management oversight of calls and correspondence ensure a high-quality, professional, empathetic, and resident focused service.
- V. Continue to gather feedback from residents regarding homelessness services using a simple anonymous feedback form.
- VI. Actively promote the current suggestion box system to encourage staff to submit suggestions for improving service efficiency and resident interactions.

Managing Expectations and Process Efficiency

- I. Consider incorporating ways to help applicants check their eligibility online for assistance before applying formally. Preventative avoidance can stop unnecessary applications from those who are not entitled, saving time and resources for both the applicants and the Council.
- II. For applicants in the process, to avoid processing delays, to explore the possibility of using automated text reminders for appointments and deadlines.
- III. Explore the feasibility of introducing a self-check-in system for applicants at reception linked to service transformation.
- IV. Continue to review and update current documentation, guides and resident facing processes in relation to eligibility, case preparation and action planning.

Staff Support & Training

- I. Ensure all Housing staff receive regular casework supervision and promote current Staff Welfare policies.
- II. Consider implementing a comprehensive peer support and training programme in collaboration with a partner organisation. This programme should include access to peer mentors with lived experience of homelessness and offer refresher training to staff. The training should also incorporate 'walk-in-my-shoes' sessions to build understanding and connection with residents.
- III. Create a learning set of resources for staff to encourage the sharing of good practice.

Partnerships and Collaboration

- I. Build on existing partnerships and further develop these with local organisations to create a wider support network for residents to access.
- II. Assign named officers to be liaisons for relevant partner agencies for accountability and, to aid effective communications going forward, introduce a generic email as the primary contact and communication tool between them and the Council.

Findings from Stakeholder Engagement

External Partners and Colleagues

- Increase outreach and support for individuals with mental health needs.
- Preference for long-term planning over short-term reactive measures
- Staff turnover and lack of consistency in partner agencies. Improve communication and consistency
- Insufficient early intervention and prevention efforts
- Limited engagement with undocumented individuals and those with no recourse to public funds.
- Uncertainty and administrative burden from Home Office policy changes. Monitor and respond to Home Office policy changes. Ensure fair distribution of asylum support responsibilities across boroughs.
- Enhance early intervention and prevention strategies to reduce homelessness.
- Improve coordination with third-sector and religious organizations.
- Utilize supported housing options outside the borough more proactively.
- Invest in long-term planning and sustainable housing solutions.
- Provide training and resources to staff for proactive referrals and support.
- Engage with young people to raise awareness and prevent homelessness.
- Address administrative inefficiencies in housing application systems (e.g., Locata).
- Concerns over succession planning and tenancy rights after family bereavement.

Front line Housing Needs and Homelessness Staff – Group 1

- Landlords are concerned about the ending of S21 evictions and this is causing small portfolio landlords to leave the rental market
- Need to build partnerships with corporate landlords
- Engage with landlords at planning stage for potential nomination rights on HMOs
- Clear guidelines needed for PRS incentives, including confirmed budgets / spending caps. Carry out regular benchmarking
- Need for a landlord engagement team
- Increased interworking between TA and Homefinders Teams
- Implement a matching system for TA residents to secure move on to PRS at an early stage

Front line Housing Needs and Homelessness Staff – Group 2

- Further training is necessary with Homelessness Prevention staff to ensure understanding of the new Social Housing Allocation Policy and Housing Register
- Cases are closed earlier at triage stage if no response received – 7 as opposed to 10 days. The re-approach rate is 30 to 40% and each requires a new case
- Website information has been extended and updated but has not impacted in terms of homelessness approach numbers
- There is an increasing backlog in processing housing register applications
- There has been a reduction in Duty to Refer numbers

Front line Housing Needs and Homelessness Staff – Group 3

- There has been an increase in households with an autistic household member approaching the authority and difficulties with finding suitable accommodation
- Locata is not currently holding sufficient information for reviews and legal assessments and results in residents having to come in to the office in person to provide documents. There is scope to increase the available Locata capacity
- Staff are struggling with case volumes. This is resulting in minimal work being done on each case and staff burnout
- Reviews are being overturned at a high rate

Front line Housing Needs and Homelessness Staff – Group 4

- There have been increased pressures from refugees leaving Home Office accommodation. The majority are single males and most are assessed as non-priority need homeless cases. They become used to the area and don't want to move elsewhere. Legal challenges are increasing.
- Asylum seekers/refugees are adding to rough sleeper numbers in the borough
- There is a shortage of affordable housing. Particular shortages include HMOs for those under 35 with more restricted benefit rates. YMCA has a long waiting list. Benefit capped families are also a challenge.
- There is a need for additional funding for single homeless clients. And greater partnership working to establish effective housing pathways.

Front line Housing Needs and Homelessness Staff – Group 5

- TA is consistently being rejected due to geographical location and S188 duty is not being discharged. Most sought after area is Hayes. Need for support workers to manage expectations
- Rough sleepers outside Civic Centre are asked to Street Link which introduces an unnecessary delay and additional rough sleepers before dealing with the homelessness issue. Review pathways and options for those verified and not verified
- Increasing numbers of approaches are coming directly bypassing the Home Office pathway (Family reunion and delayed processing by Home Office)
- There is a reluctance from landlords to accept ex-offenders and more landlords are doing their own background checks
- Despite Hillingdon having a high volume of HMOs there is no pipeline into the homelessness team

Front line Housing Needs and Homelessness Staff – Group 6

- Prolonging of cases being open due to time it takes for Locata processing,
- Lack of affordable self-contained or supported self-contained for single adults.
- Key contacts in partner agencies leaving
- Trinity Housing and YMCA waiting lists are long.
- Managing young people's housing expectations.
- NASS not wanting to move out of Borough.
- Unaffordability of private rented accommodation locally.
- Recruitment due to contract ending
- Continuing our partnership working with REAP and delivering the workshops.
- We will continue to liaise with out of Borough providers to build relationships, enabling us to refer to them.
- Ensuring we establish contact with the replacement staff and build relationships

Housing Needs Seniors and Housing Colleagues in other Housing Teams

- The lack of Article 4 direction for most of the borough or discretionary licensing has fostered a surge in unlicensed HMOs and this is associated with poor quality and anti-social behaviour concerns
- There are resource constraints which limit inspections
- A shift is underway towards long-term leasing and acquisitions, many already completed and many more under evaluation
- Short life properties are working well.
- High mental health needs but good service engagement
- There are limited move-on options due to stock shortages
- Shifted needed from 60% to 70% relief towards greater upstream prevention. Plans include new prevention fund and court officer, incentives to prevent family/friends evictions, 'Find Your Own' scheme
- Need for clearer decision-making structures, improved cross-departmental coordination.

Related services council colleagues

- We are seeing an increase in homelessness due to violence and exploitation. There is a need for joint protocols and training
- There has been a 58% increase in domestic abuse related homelessness approaches. There is a low referral rate from Housing Needs to advocacy services. There is a need for women only accommodation
- Care leaver pathways need to be clearer. More communication needed
- There is a need for a collaborative framework around housing and mental health. Issues regarding expensive supported housing placements and unsuitability for general needs housing
- Issues related to poor quality of TA and hotels and need for better regulation of HMOs.
- There is a lack of notification when other boroughs place vulnerable families in Hillingdon
- There is a need to align with 'Working Together 2023 'national safeguarding guidance'
- Develop joint training, protocols, and communication channels between housing and social care and youth and adolescent services.
- Improve data sharing, monitoring, and referral pathways.
- Address temporary accommodation quality, supply, and specialist needs.
- Consider public perception and realistic messaging about housing pressures.
- Explore licensing schemes and Pan-London notification systems.

Housing Needs Managers

- Broad consensus in support of the overarching vision presented.
- A strong emphasis was placed on compassion and empowering residents throughout service delivery.
- Preventative work must be prioritised, including the implementation of a tenancy tracking system to identify households at risk of homelessness at an earlier stage.
- Properties should be matched and referred to the Homefinders team from day one to ensure timely intervention.
- Consistent approach to utilising a prevention fund for landlord incentives
- The potential to access “data on demand” should be investigated to enhance responsiveness and decision-making.
- Bare licence eviction process requires review, as it remains the predominant reason for approaches to the local authority in 2024/25.
- Improved tracking of cases at the triage stage is needed to identify missed opportunities for early prevention.
- The service is currently experiencing staffing shortages, with recruitment underway for an additional 10–15 full-time equivalent (FTE) posts.
- A review is needed of rough sleepers currently on the street who have no recourse to public funds (NRPF).
- A more detailed analysis of emerging trends is required to inform strategic planning.
- The rough sleeping population is becoming younger, with Home Office cessation identified as a contributing factor.
- The Discretionary Housing Payment (DHP) process should be reviewed in collaboration with the Housing Benefit teams.
- Further integration of employment support with housing services is required to better assist residents in achieving sustainable outcomes.
- A Hospital Discharge Officer is now in post, enabling closer collaboration with Hillingdon hospitals to support timely and appropriate housing solutions.
- A comprehensive review of the Housing Reception service is necessary, with a particular focus on improving accessibility. The Q-Matic appointment system should be revisited to enhance service delivery.
- Mechanisms for capturing complaints and embedding learning into service improvements must be strengthened.
- A formal quality assurance framework should be introduced to ensure consistency and accountability across housing services.
- A structured approach to gathering resident feedback should be adopted to inform service development and responsiveness.
- Equalities impact assessments and regular monitoring of equalities data should be carried out to ensure services remain inclusive and equitable.
- An awareness programme aligned with the Renters Reform Bill should be developed for landlords, with a focus on Section 21 changes and the risks of discriminatory practices on families with pets etc.
- There is a recognised gap in housing provision for individuals with high-level complex needs; suitable accommodation options must be explored.
- Consideration should be given to see how a Housing First model could potentially work in Hillingdon.
- Outreach efforts should be expanded through deeper engagement with voluntary and community sector (VCS) organisations and faith-based groups.

Commercial Waste and General Waste Services

Committee name	Residents' Services Select Committee
Officer reporting	Jordan Groves, Head of Waste and Green Spaces
Papers with report	None
Ward	All

HEADLINES

This report provides the Residents' Services Select Committee with an overview of the Council's commercial waste service performance and an update on borough-wide waste and recycling services for the 2025/26 financial year. It includes key operational data, service changes linked to Simpler Recycling reforms, performance indicators, resident impacts, and ongoing improvement initiatives across Waste Services, Recycling, Trade Waste, Street Cleansing and Civil Amenities

RECOMMENDATIONS

That the Residents' Services Select Committee:

- 1. Notes the update in the report.**

SUPPORTING INFORMATION

Commercial Waste Service Performance (Trade Waste)

To date in the 2025/26 financial year, the service has secured 79 new contracts generating £198,301.90 in income. Over the same period, 98 contracts have ended, representing a loss of £138,913.84. This results in a net positive income position of £59,388.06, despite operating within a highly competitive and challenging commercial environment.

The primary reasons for contract cessation are price sensitivity within the market and non-payment of invoices. Of the contracts lost, 43 accounts were terminated specifically due to non-payment. The service is currently working with Corporate Recovery to determine appropriate next steps regarding unpaid debts, including escalation to external debt collection agencies or legal processes where necessary. In addition, there have been 11 cancellations relating to pricing and 30 instances where businesses have either ceased trading or relocated outside the borough boundary.

The service has continued to focus on service optimisation and upselling opportunities with existing customers. As part of this, the service has successfully increased recycling and food waste capacity where appropriate and has upsold 76 additional 140-litre food waste containers and 36 additional recycling bins. The service has also seen an uplift in general waste collections

from existing customers whose waste generation has increased.

Overall, while the total number of contracts has decreased, income remains on an upward trajectory. This is due to enhanced service uptake among existing customers and the higher value of new contracts compared to those lost. Without the recent increase in non-paying customers, the service would have recorded a net gain in both contract numbers and income.

Furthermore, the service continues to review the Council's existing trade waste agreements identifying potential and working with businesses to ensure they are compliant with waste legislation, in particular ensuring they have a valid waste disposal contract in place. Where non-compliance is identified and not remedied officers are working increasingly with the enforcement team to ensure they do become compliant and not impede on residents' experience of the Borough.

General Waste Update

The service remains unchanged from previous years with the exception of Garden Waste becoming a paid for service halfway through 2025. The Service operates a weekly sack collection model with the exception of properties that require bulk bins or those that present a kerbside food waste container.

Garden waste has a current subscription base of 23,240 with the new subscription period due to open in April. The income generated from the subscription in this financial year was £1.62m which is a strong contribution to the operating costs of the waste service. For the current financial year, the garden waste service collected 10,126 tonnes of green waste which contributes to the Council's recycling rate. Over the Christmas period the garden waste service continued to operate, and residents were also offered a free kerbside Christmas tree collection. There were some issues with this service as residents who did not have a garden waste permit were unable to report misses in the system or identify what their scheduled collection day would be over the fortnight available.

December and early January were a busy time of year for the Waste collection teams with the Christmas period one of the busiest in the year due to the 3 bank holidays that impact on the regular waste collection schedules for residents. This most recent Christmas the service was "pulled forward" which means that instead of working a day behind the normal collection schedule the schedule was instead worked a day in advance beginning with Monday 22 December being rescheduled to Saturday 20 December. These changes were communicated ahead of time by the Council; however, this change resulted in a large number of residents not having their waste collected as they presented on their normal days. This had an impact on the service which then experienced a large number of missed collection reports which it reacted to and cleared well but it did result in the service being under pressure for the period as it reacted to these.

The service is currently experiencing some challenges with an aging fleet of vehicles which will require replacing via a capital programme in the current years and the procurement team will support the service in acquiring these. Some changes to the vehicle layout and design may be required as the existing fleet profile, particularly cab capacity, is being phased out by suppliers which may have an impact on the way the service operates some of its rounds.

The service is also aware that there have been a number of reported issues with the recycling and food waste sacks supplied to residents. In the previous financial year, the contract for sacks

was expiring and a procurement exercise was undertaken which was awarded to a new supplier. The service has conducted an investigation into the sacks provided to the Council and has identified that these are not to the standard required. Officers are currently working through remedial actions with the supplier to address these quality concerns.

Alongside this, a mobile waste collection pilot has been established, with eight “drop and go” events planned across the Borough, beginning with the first event at Charville Community Centre on Saturday 31 January from 10am to 2pm. Efforts to reduce contamination continue to show progress: at kerbside, a structured three step education process is being applied using crew reports to target persistent issues; while in communal settings, trials of reverse lidded recycling bins at high contamination sites have shown significant improvements, and work is underway to assess the feasibility of a boroughwide roll out. A step education process is being applied using crew reports to target persistent issues. Lidded recycling bins at high contamination sites have shown significant improvements, and work is underway to assess the feasibility of a boroughwide rollout. -step education process is being applied using crew reports to target persistent issues-lidded recycling bins at high-contamination sites have shown significant improvements, and work is underway to assess the feasibility of a borough-wide rollout

Simpler Recycling

Implementation of the Simpler Recycling programme is progressing to schedule across all housing types. For Flats Above Shops (FLASH), surveying has been completed on time and database updates are now being finalised to accurately define collection points, with communication letters due to be issued imminently. All required stock has been secured to support the rollout, which commenced in the first week of February to provide new food waste and recycling containers to a further 2,200 properties. For private blocks, 17,000 information letters have been printed and delivered to the depot, and the rollout - initiated on 19 January - is expected to conclude within six weeks, bringing an additional 17,000 properties into the food waste service.

PERFORMANCE DATA

A summary of key service performance indicators:

- Commercial waste income: **£2.1m turnover**.
- Monthly trade users: **1,414**.
- Harefield CA diversion rate: **increased to 74%**. (Diversion means waste diverted from incineration or landfill)
- Additional food waste properties delivered (2025/26): **19,200+** across FLASH and private blocks.
- Recycling contamination: Improvements evidenced in trial blocks through reverse-lidded bins.

RESIDENT BENEFIT

- Expanded food waste and recycling services improve sustainability, reduce landfill dependency and prepare residents for statutory national requirements.

- Drop & go events provide safe alternatives to waste dumping and reduce fly-tipping.
- Enhanced contamination reduction work improves recycling quality and reduces disposal costs.

FINANCIAL IMPLICATIONS

- Commercial Waste contributes £2.1m income towards service costs.
- Debt recovery work is ongoing to mitigate risk from unpaid trade waste accounts.
- Harefield CA site trade income reached £1.16m by December 2025.

LEGAL IMPLICATIONS

- The Council must comply with national Simpler Recycling legislation requiring separate collection of core recyclable materials.

BACKGROUND PAPERS

Nil.

DRAFT WEST LONDON WASTE PLAN

Committee name	Resident's Services Select Committee
Officer reporting	Gavin Polkinghorn
Papers with report	Appendix A: Cabinet Report – West London Waste Plan Regulation 18 Consultation Appendix B: Maps of safeguarded waste sites Appendix C: West London Waste Plan Regulation 18 Draft
Ward	All

HEADLINES

This report describes the West London Waste Plan, which was approved by Cabinet for public consultation in line with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

RECOMMENDATIONS

That the Residents' Services Select Committee

- 1. Notes the contents of the draft report and appendices; and**
- 2. Reviews the draft West London Waste Plan and comments on any matters it would like considered as this Plan is sent for further Cabinet consideration in June.**

SUPPORTING INFORMATION

It is a statutory requirement for each area to have a 'waste local plan' that sets out how and where waste expected to be produced within the area is to be managed. Policies in waste local plans are used by the Local Planning Authority (LPA) alongside policies contained in other development plan documents, to determine applications for planning permission relating to waste management development.

The West London Waste Plan (WLWP) is a strategic plan that plans for waste management sites in the West London Boroughs (Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond upon Thames, and the Old Oak & Park Royal Development Corporation).

Key elements of the WLWP include:

- the amount of waste to be managed in West London over the plan period (waste arisings);
- an updated list of safeguarded waste sites across West London with sufficient waste management capacity to manage expected waste arisings; and
- updated policies against which planning applications for waste-related development will be

determined.

The WLWP is part of the Council's development plan and, therefore a policy framework document. The current plan was adopted in 2015 and is considered in many respects to be out-of-date in the context of national and regional planning policy and therefore needs to be replaced. The West London Boroughs with the West London Alliance have commissioned BPA consultants to prepare the new WLWP. Once adopted the updated WLWP will replace the 2015 West London Waste Plan taking account of changes in policy and taking the planning horizon forward for another 15 years.

Work is underway on the new WLWP. The first consultation relating to the updated West London Waste Plan (known formally as the 'Regulation 18 Draft Updated West London Waste Plan') recently completed. The consultation ran from Thursday 11 December 2025 to Thursday 5 February 2026.

Safeguarded sites

A total of 23 sites in the London Borough of Hillingdon is proposed to be safeguarded. These sites are listed in the Draft WLWP (Appendix 2) and maps of the sites are provided in Appendix 3. This is a decrease on the existing number of safeguarded sites in Hillingdon (25) and no new site allocations are proposed.

Next steps

The full timetable is set out in the cabinet report (Appendix 1). The proposed submission version of the WLWP is set for consultation in mid-2026 and examination expected for early to mid-2027.

RESIDENT BENEFIT

Managing waste is a key part of a well-functioning modern society. If waste is not handled in the right facilities or locations, it can harm both the environment and local communities. The WLWP is the key strategic planning tool to manage waste in the Borough.

FINANCIAL IMPLICATIONS

The costs of the consultation arising from approving the Regulation 18 Consultation are estimated to not exceed £3k and would be funded from the existing Planning Policy Service revenue budget. The costs for the West London Waste Plan have been agreed and are £30k per borough per year over the five-year period 2023/24 to 2027/28, which is met from the Strategic Planning Earmarked Reserve and is reflected within the budget monitoring position.

LEGAL IMPLICATIONS

The legal implications are set out in full in Appendix 1 to this report, the Cabinet report for approval to consult on the regulation 18 West London Waste Plan. The Council will be conducting the consultation in accordance with the Town and Country Planning (Local Planning) Regulations 2012 (as amended).

BACKGROUND PAPERS

NIL

APPENDICES

[Appendix 1: Cabinet Report – West London Waste Plan Regulation 18 Consultation](#)

[Appendix 2: West London Waste Plan Regulation 18 Draft](#)

[Appendix 3: Maps of safeguarded waste sites](#)

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WEST LONDON WASTE PLAN REGULATION 18 CONSULTATION

Cabinet Member & Portfolio	Cllr Steve Tuckwell, Cabinet Member for Planning, Housing and Growth Cllr Eddie Lavery, Cabinet Member for Community & Environment
Responsible Officer	Dan Kennedy, Corporate Director of Residents Services
Report Author & Directorate	Gavin Polkinghorn, Planning Policy Team Leader, Residents Services
Papers with report	Appendix A: List of Safeguarded Sites. Appendix B: Maps of Safeguarded Sites. Appendix C: West London Waste Plan Regulation 18 Draft.

HEADLINES

Summary	<p>This report seeks Cabinet agreement to undertake a public consultation on the Draft West London Waste Plan in line with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). A draft version of the consultation document is provided (Appendix C).</p> <p>This decision also seeks approval for a number of other related steps that are deemed necessary to progress the West London Waste Plan after the Regulation 18 Consultation.</p>
<p>Putting our Residents First</p> <p>Delivering on the Council Strategy 2022-2026</p>	<p>This report supports our ambition for residents / the Council of: Live in a sustainable borough that is carbon neutral</p> <p>This report supports our commitments to residents of: A Green and Sustainable Borough</p>
Financial Cost	The costs of the consultation arising from approving the Regulation 18 Consultation are estimated to not exceed £3k and would be funded from the existing Planning Policy Service revenue budget.
Select Committee	Resident's Services
Ward(s)	All

RECOMMENDATIONS

That:

- 1) Regulation 18 consultation on the Draft West London Waste Plan attached in Appendix C be agreed;
- 2) Authority be delegated to the Director of Planning and Sustainable Growth (as Chief Planning Officer) to make minor modifications to the draft Plan before consultation launch (in conjunction with other participating boroughs);
- 3) the outcome of the consultation be reported back to Cabinet in 2026 with subsequent approval sought for a second round of consultation known as Regulation 19.

Reasons for recommendations

The West London Waste Plan (WLWP) is part of the Council's development plan and, therefore a policy framework document. The current plan was adopted in 2015 and is considered in many respects to be out-of-date in the context of national and regional planning policy and therefore needs to be replaced.

The process of preparing a new WLWP includes statutory consultation periods. Cabinet approval is required from each of the participating boroughs to commence the Regulation 18 consultation. The new plan is being prepared in the context of the national December 2026 submission deadline for plans to progress under the current plan-making legislation. Delegated authority to recommend minor amendments to the Plan prior to consultation is necessary to allow the process to continue in a timely manner. The final submission version of the plan, which will be produced next year, will require further Cabinet consideration and ultimately Full Council approval in accordance with the Council's Constitution.

It is a statutory requirement for relevant local planning authorities to produce plans to assist with decisions involving waste developments. These plans can be produced jointly with other planning authorities to address strategic matters. There are also significant cost savings achieved by doing so jointly.

Alternative options considered / risk management

The option of not approving the draft updated WLWP for consultation. This decision would delay the adoption of the WLWP, meaning that the participating west London boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond upon Thames and the OPDC would not have an up-to-date Waste Local Plan against which to determine planning applications for waste related development. Significant delay could result in LB Hillingdon not being able to participate in the WLWP update process.

Democratic compliance / previous authority

The WLWP forms a Development Plan document and thereby consideration and adoption of it follow the procedures for Policy Framework documents in the Constitution. The timetable for this is set out in the report below.

Select Committee comments

None at this stage. The relevant select committee will be engaged in this as part of the consultation process, as a policy framework document.

SUPPORTING INFORMATION

Why is the waste plan being reviewed?

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 or parts of plans may be regarded as not being up-to-date and may be given less weight in planning decision-making.

The current WLWP was adopted over 10 years ago. It is being updated to provide an up-to-date set of policies to determine planning applications for waste-related development and ensure that sufficient capacity is available to manage expected waste arisings over the next 15 years. The updated Plan will also address the Household, Industrial and Commercial (HIC) waste apportionment and management targets for construction and demolition waste set out in the 2021 London Plan.

Key elements of the emerging WLWP

The emerging updated WLWP follows a similar format to the adopted plan. Key elements include the amount of waste to be managed in West London over the plan period (waste arisings), an updated list of safeguarded waste sites across West London with sufficient waste management capacity to manage expected waste arisings and updated policies against which planning applications for waste-related development will be determined.

Waste arisings in West London

The starting point for the updated WLWP is the Household, Industrial and Commercial (HIC) waste apportionments set out in the current London Plan (March 2021). The apportionment is the percentage share of London's total predicted HIC waste arisings that each Borough is expected to plan for through to 2041 in terms of the land take required to process the anticipated flows of waste.

The London Plan encourages Boroughs to pool these apportionments. When the HIC waste apportionments for each west London Borough are pooled it means they are expected to manage 1,615,000 tonnes of the forecast London's HIC waste arisings between 2021 and 2041. Hillingdon's waste apportionment is 365,000 tonnes of London's total forecast HIC waste arisings in 2041.

In addition to the HIC waste apportionments, the Boroughs are expected to ensure sufficient capacity is available within the plan area for the amount of Construction and Demolition (C&D) waste forecast to arise in west London over the Plan period, to be managed in accordance with the management targets set out in Policy SI 7 of the London Plan.

The Boroughs are not expected to ensure sufficient capacity is available to manage all the hazardous waste forecast to arise in west London within the Plan area, rather there is an expectation that its management be planned for in collaboration with neighbouring authorities. Similarly, there is no expectation that excavation waste will be exclusively managed within west London, or London as a whole.

Vision and objectives

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

WLWP policies

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

The draft updated WLWP contains the following policies:

- Policy WLWP 1 – Safeguarding and Optimising Waste Site Network: Keystone policy to make the most of 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 introducing waste specific requirements/standards facilities need to meet.
- Policy WLWP 5 – Recovery and Disposal of Waste to Land: Policy defining specific conditions under which proposals for non-inert landfill, placement of inert waste; and excavation/mining of existing landfills may be consented.
- Policy WLWP 6 – Circular Economy: Policy setting out the requirements for proposed development to fulfil certain sustainability criteria.

Safeguarded sites

To be in general conformity with the London Plan, the WLWP is required to identify sufficient waste management capacity to manage the projected C&D waste arisings and the total London Plan HIC waste apportionment for west London. Sites that are:

- Sites with extant planning consents for a waste use;
- Sites granted Certificate of Lawful Existing Use or Development; and
- Sites deemed to be lawful over time or ancillary to another lawful use.

A total of 23 sites in the London Borough of Hillingdon are safeguarded. These sites are included in Appendix A with maps provided in Appendix B. It should be noted that this is a decrease on the existing number of safeguarded sites in Hillingdon (25) and no new site allocations are proposed.

Integrated Impact Assessment and Evidence Base for the draft WLWP

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

The IIA is undertaken as an iterative process during the plan's preparation. It includes assessments of preferred policy approaches and reasonable alternatives. Reports are published and consulted on at key stages in the plan process, often alongside draft Local Plan documents. The IIA helps to identify potential issues at an early stage so that measures to avoid or mitigate harm, and improve expected outcomes, can be incorporated into the plan. The IIA team had the opportunity to comment and make recommendations on the Regulation 18 WLWP policies as they were being drafted, and this resulted in more comprehensive mitigation requirements within some of the draft policies to help to minimise adverse effects of new or redeveloped waste management facilities.

The key findings of the IIA can be summarised as follows:

- Overall, the draft Vision, Strategic Objectives and Policies in the Regulation 18 WLWP are likely to have a range of minor positive and significant positive effects particularly in relation to moving waste management up the waste hierarchy, helping to reduce CO2 emissions, supporting the local economy and health and wellbeing.
- Several mixed minor positive and negative effects were identified for the environmental objectives because of the potential negative impacts associated with the development of new waste facilities, depending on when and where development comes forward, and the specific features and design of any new facility.
- Policies within the draft WLWP and other parts of the development plan provide criteria to minimise any adverse effects of new or redeveloped waste sites.
- No significant negative effects were identified for the Regulation 18 WLWP proposed policies.

Other evidence

BPP Consulting has prepared a Waste Capacity Report, which assesses the management capacity of existing waste sites across the plan area to determine if the waste apportionments set out in the current London Plan 2021 will be met. A survey of waste operators (that run the principal waste sites across west London) has been undertaken to test the findings of this work.

The Capacity Report forms a key part of the evidence base for the emerging updated WLWP and indicates that at this stage, there is sufficient waste management capacity within existing sites across west London to meet the London Plan apportionments and C&D waste management

targets. There is a possibility that the waste apportionments could increase as part of the London Plan Review or the Regulation 18 consultation might find that existing waste sites are no longer available. Officers are therefore of the view that a 'call for sites' exercise should be undertaken as part of the Regulation 18 consultation.

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

Next steps in the plan making process

Subject to Cabinet approval, the Regulation 18 draft updated WLWP will be issued for consultation over an eight-week period commencing in November/December 2025. Following the closure of the consultation, the responses received will be analysed and the findings used to inform the production of the Regulation 19 version of the Plan that boroughs intend to submit for examination. This version of the WLWP will return to Cabinet for approved, prior to being published for further comment and further information on the timetable for submission and examination process will be provided at this stage. The final submission version of the plan will require Full Council approval. The full WLWP programme is set out below.

Key Stage	Timeline
Draft emerging WLWP – 6/8-week public consultation (Regulation 18)	November/December 2025
WLWP Proposed Submission (Regulation 19) to Cabinet then Full Council	TBA prior to mid 2026
Proposed Submission WLWP published for representations (Regulation 19)	Mid 2026
WLWP submitted for independent examination	Late 2026
Examination hearings (if needed)	Early/Mid 2027
Main modifications (if needed) published for representations	Mid 2027
Inspector's Report	Late 2027
Adoption	Late 2027/Early 2028

Going forward, other activities in the plan making process will include:

- Maintaining dialogue with the Greater London Authority to ensure the emerging updated WLWP is in general conformity with the current and emerging London Plan, which has also recently commenced review.
- Continuing with duty to co-operate activities, including preparing and agreeing statements of common ground with neighbouring authorities and relevant organisations as needed.
- Keeping the evidence base under review to ensure it continues to support the emerging plan. At this stage, it is not considered that additional evidence is required to support the emerging policies or sites.
- Engaging in governance activities, including the potential establishment of a working group with elected representatives from each of the west London boroughs.

Financial implications

The preparation of the West London Waste Plan is being led by BPP Consulting, with specialist sub-consultancy input from Land Use Consultants (Integrated Impact Assessment) and Metis (Strategic Flood Risk Assessment). The overall project is being managed by the West London Alliance. The cost of undertaking the project (consultancy and project management) is £29,500 per year per borough over the duration of the project (2023/24-2027/28). The WLWP funding has been agreed at directorate level and is funded by the Strategic Planning EMR. It has been included in the budget monitoring position. This decision will help ensure that the WLWP is completed on time and that no further funding is required.

This decision has a cost of no more than £3k to cover administering the consultation activities at borough level. This includes advertisements in local newspapers and printing and distribution of the consultation documents to libraries and selected stakeholders. These costs will be funded from the existing Planning Service revenue budget.

RESIDENT BENEFIT & CONSULTATION

The benefit or impact upon Hillingdon residents, service users and communities

Managing waste is a key part of a well-functioning modern society. If waste is not handled in the right facilities or locations, it can harm both the environment and local communities. The WLWP is the essential planning tool to manage waste in the borough.

Equalities implications

The draft WLWP has been informed by an Integrated Impact Assessment that includes an Equalities Impact Assessment as set out in this report. This will be updated as the project progresses. The report has been included as a background paper.

Consultation and Engagement

The Regulation 18 version of the updated WLWP is scheduled to be issued for consultation in November/December 2025, once it has been approved for consultation by all of the participating boroughs. The approach to the consultation process will meet statutory requirements, including the provisions of each borough's Statement of Community Involvement (SCI). The following methods will be used to communicate how the WLWP is being prepared.

- A dedicated website will serve as a single, accessible portal for all updates, consultation materials, FAQs, and opportunities for involvement.
- Information and consultation documents will be published on Borough's websites and made available for inspection at main offices, libraries, and other community venues.
- Notification of the process by each Borough, in line with SCIs, (generally) emailing stakeholders in its area using details held on consultation databases.
- Boroughs will publicise key stages of the WLWP production using established social media channels (e.g. X (Twitter), Facebook, Instagram, YouTube channel)
- Publication of hard copies of draft versions of the Plan at each consultation stage for inspection at main offices and certain libraries.

- Publicise using local media (e.g. local newspapers or newsletters) at key stages of the process.

An online joint launch event will take place at the initial publication of the draft updated WLWP at Regulation 18 stage. A particular purpose of the online meetings is to ensure that all those who are interested are given an opportunity to be involved. There is also an option to hold in person drop-in sessions at accessible venues and convenient times.

There will be a minimum of two consultation periods during the Plan production process, each lasting at least six weeks. The first will begin following the publication of the draft Regulation 18 version of the plan and its supporting documents, with a second taking place once the Regulation 19 draft plan is published. If significant new issues arise from the Regulation 18 consultation, a further round (or targeted re-consultation on specific issues) may also be undertaken.

Comments received at all consultation stages will be recorded (on a project database), and a summary report produced, which will be made publicly available on the project website.

Duty to Cooperate

Engagement with key organisations has commenced to ensure the emerging WLWP is compliant with the duty to co-operate (a legal requirement of the plan-making process). In particular, discussions have been held with the GLA to determine expectations and statements of common ground will be drafted with neighbouring authorities and other key partners.

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance have reviewed this report and concur with the Financial Implications set out above, noting approval is sought to proceed with the Regulation 18 consultation for the Draft West London Waste Plan, with delegated authority for minor pre-consultation modifications to be granted to the Director of Planning and Sustainable Growth, with the outcome of the consultation to be reported in 2026, ahead of the proposed Regulation 19 consultation.

Furthermore, it is noted the West London Waste Plan is managed by the West London Alliance, with the total consultancy and project management cost of £30k per borough per year over the five-year period 2023/24 to 2027/28, which is met from the Strategic Planning Earmarked Reserve and is reflected within the budget monitoring position. An additional £3k will be required to support the borough-level consultation activities, which will be met from the existing approved Planning Service revenue budget. As at Month 5 the Planning, Regeneration and Environment Service were reporting a favourable variance of £4k. The cost of the consultation will be monitored through the regular monthly monitoring cycle.

Legal

When preparing the Local Plan, the Local Planning Authority (“LPA”) must comply with the consultation requirements set out in Regulation 18 of the Town and Country Planning (Local

Planning) Regulations 2012 (as amended) (“the Regulations”). The LPA must consult with specific consultation bodies as defined in Regulation 2 of the Regulations. Any representations received must be taken into account before a formal consultation on the proposed submission documents and statement of the representations procedure (“Regulation 19”).

Property

Only two of the sites listed are Council owned sites and these are both currently used for waste purposes, so it is not considered the contents of this report will have any impact on the Council’s property portfolio.

BACKGROUND PAPERS

Existing West London Waste Plan: [West London Waste Plan 2015](#)

West London Waste Plan Integrated Impacts Assessment Regulation 18 Draft Plan: [IIA Report for the Reg. 18 West London Waste Plan](#)

Appendix A

Reference	Site Name	Operator	Type of Facility	Safeguarding justification	Permit date
HI01	New Years Green Lane CA Site & WTS	Hillingdon Council	WTS	Permanent permission	1989
HI02	Airside Waste Sweepings Treatment Facility	Heathrow Airport Ltd	Treatment	Lawful over time	2015
HI03	New Years Green Lane	BFA Recycling Ltd	MRS	Lawful over time	2012
HI04	WTS, Civic Way, Ruislip	B&K Environmental Services Ltd	WTS	Lawful over time	2007
HI06	Land off Holloway Lane, Harmondsworth	Foley Haulage Ltd	Treatment	CLEUD	2020
HI07	GK Depot, Trout Road	Recycling with Skips Ltd	Treatment	CLEUD	2018
HI08	Old Stockley Road, West Drayton	Hanson Quarry Products Europe Ltd	Treatment	Lawful over time	2015
HI09	Holloway Lane Materials Recycling Facility	Powerday Ltd	Treatment	CLEUD	2002
HI13	Skip Lane, Harvill Road	Sortera Ltd	Treatment	Permanent Permission	1991
HI14	WTS Off Rigby Lane	Talking Rubbish Waste Solutions Ltd	Treatment	-	2022
HI15	Skip Lane, Harvill Road	Thames Materials Ltd	Treatment	Lawful over time	2015
HI16	Unit 1, Wallingford Road Recycling Facility	Uxbridge Recycling Ltd	Treatment	Permanent Permission	2012
HI17	Crows Nest Farm	Country Compost Ltd	Compost	Permanent Permission	2005
HI18	High View Farm	West London Composting Ltd	Compost	Permanent Permission	1995
HI19	Hillingdon Clinical Waste Incinerator	Medisort Ltd	Incin	-	2021
HI20	Cranford Lane WTS, Heathrow	Heathrow Airport Ltd	WTS	Lawful over time	1981
HI21	Waybeards Farm, Hill End Road, Harefield	FJ Heppelthwaite Solutions Ltd	WTS	Lawful over time	2008

HI24	Heathrow Depot	FM Conway	Treatment	Permanent Permission	2015
HI25	Central Depot Harlington Road	Hillingdon Council	WTS	Permanent Permission	2023
HI27	Unit 1 & 2 Pump Lane Industrial Estate	Personnel Hygiene Services Ltd	WTS	Lawful over time	1999
HI28	Hayes Transfer Station Rigby Lane	Suez Recycling and Recovery UK Ltd	WTS	Permanent Permission	1993
HI29	Victoria Road WTS	Suez Recycling and Recovery UK Ltd	WTS / RDF	Permanent Permission	2014

Acronyms:

WTS – Waste Transfer Station

Incin – Incinerator

MRS –

RDF – Refuse Derived Fuel

CLEUD – Certificate of Lawful Existing Use or Development

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Figure 1: HI01 - New Years Green Lane Civic Amenity Site

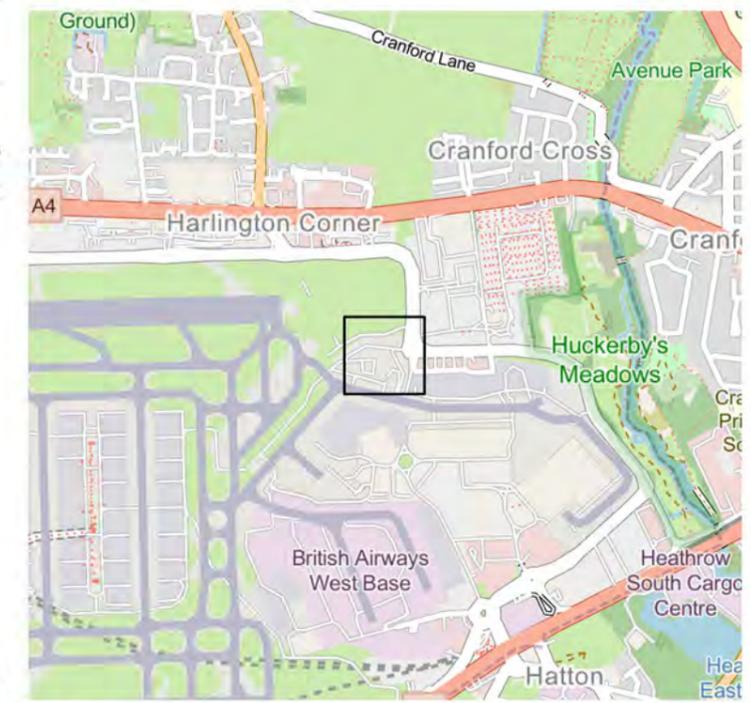
Site boundary





Figure : HI02 - Airside Waste Sweepings Treatment Facility

 Site boundary



Map scale 1:1,000 @ A3



Figure 2: HI03 - New Years Green Lane



Site boundary



Map scale 1:1,000 @ A3





Figure 3: HI04 - B&K WTS, Civic Way, Victoria Rd

Site boundary



Map scale 1:1,000 @ A3



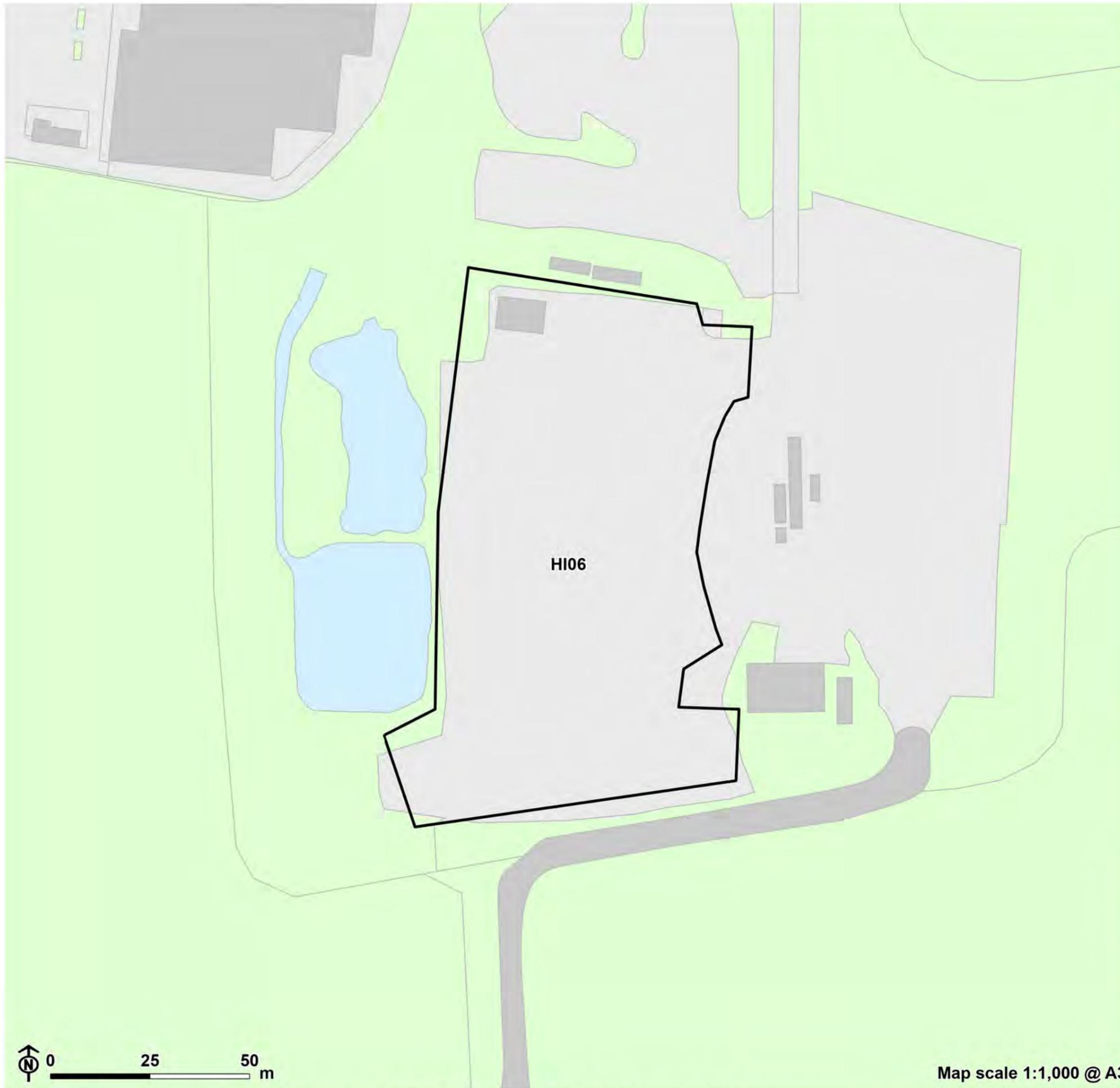
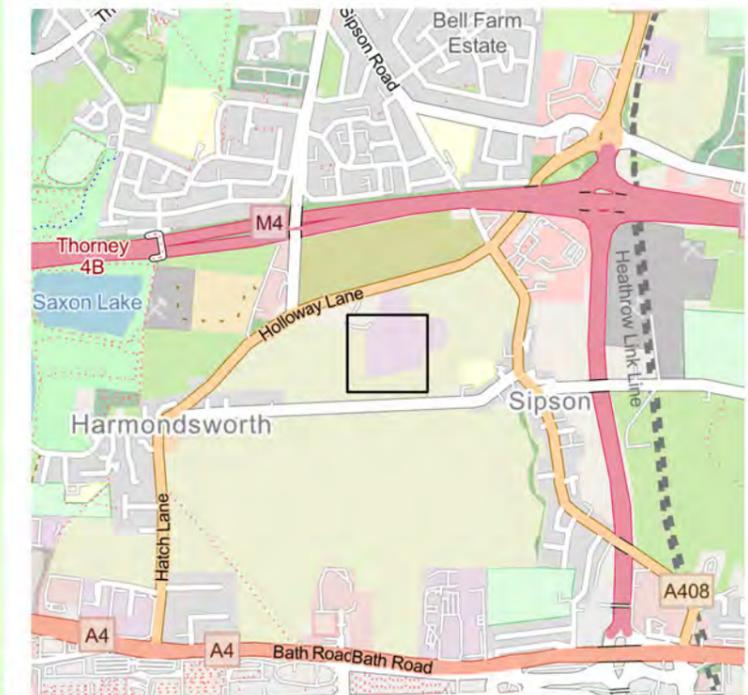


Figure 4: HI06 - Land off Holloway Lane Harmondsworth

Site boundary



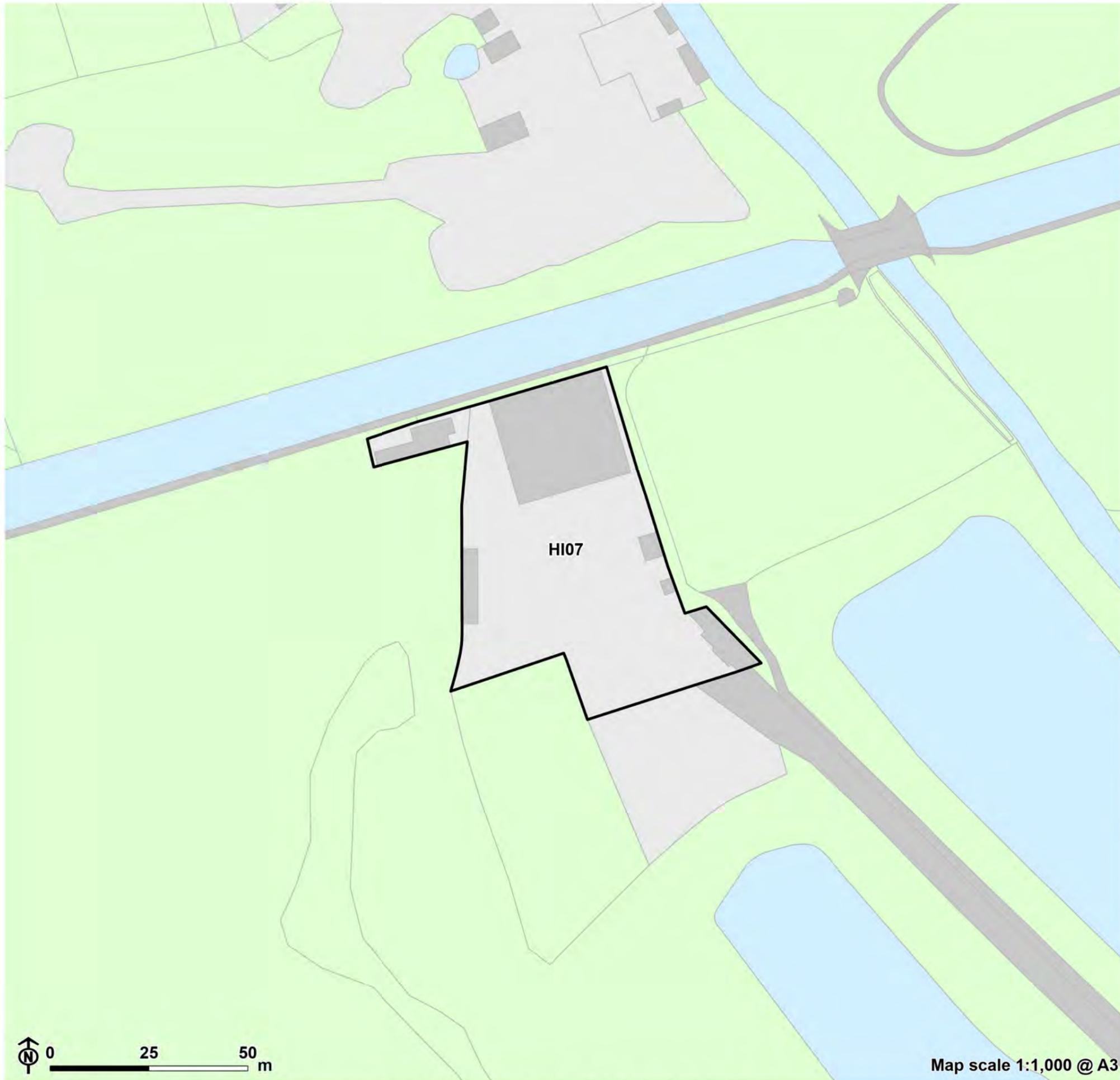


Figure 5: HI07 - G K Depot

Site boundary

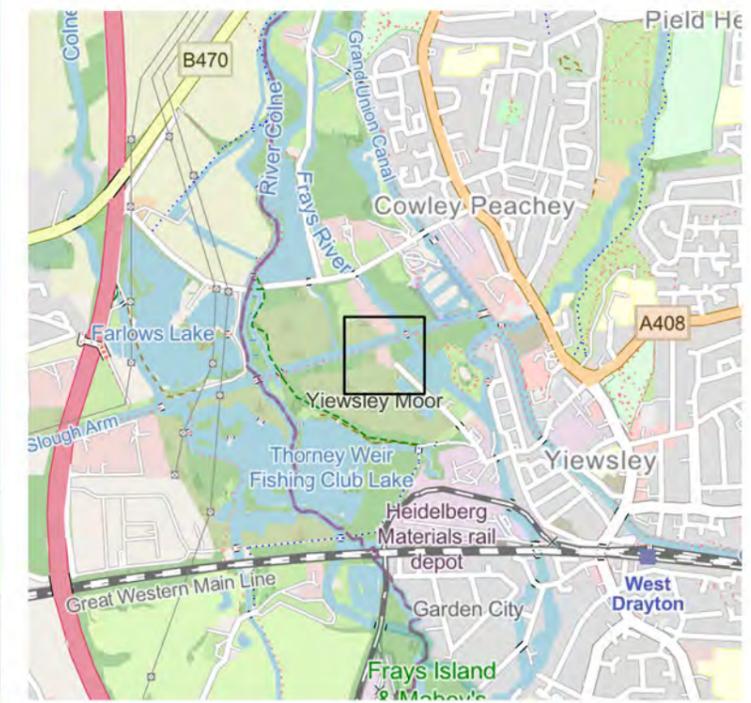
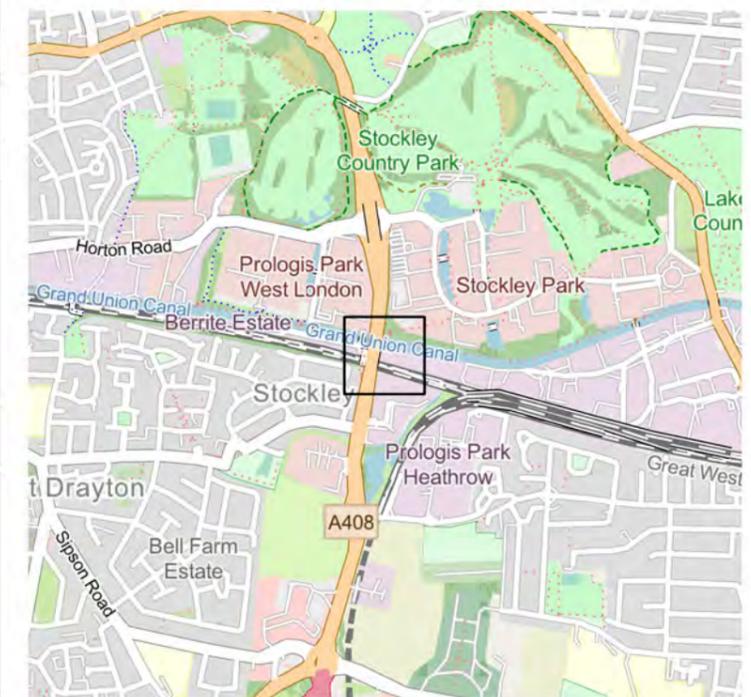
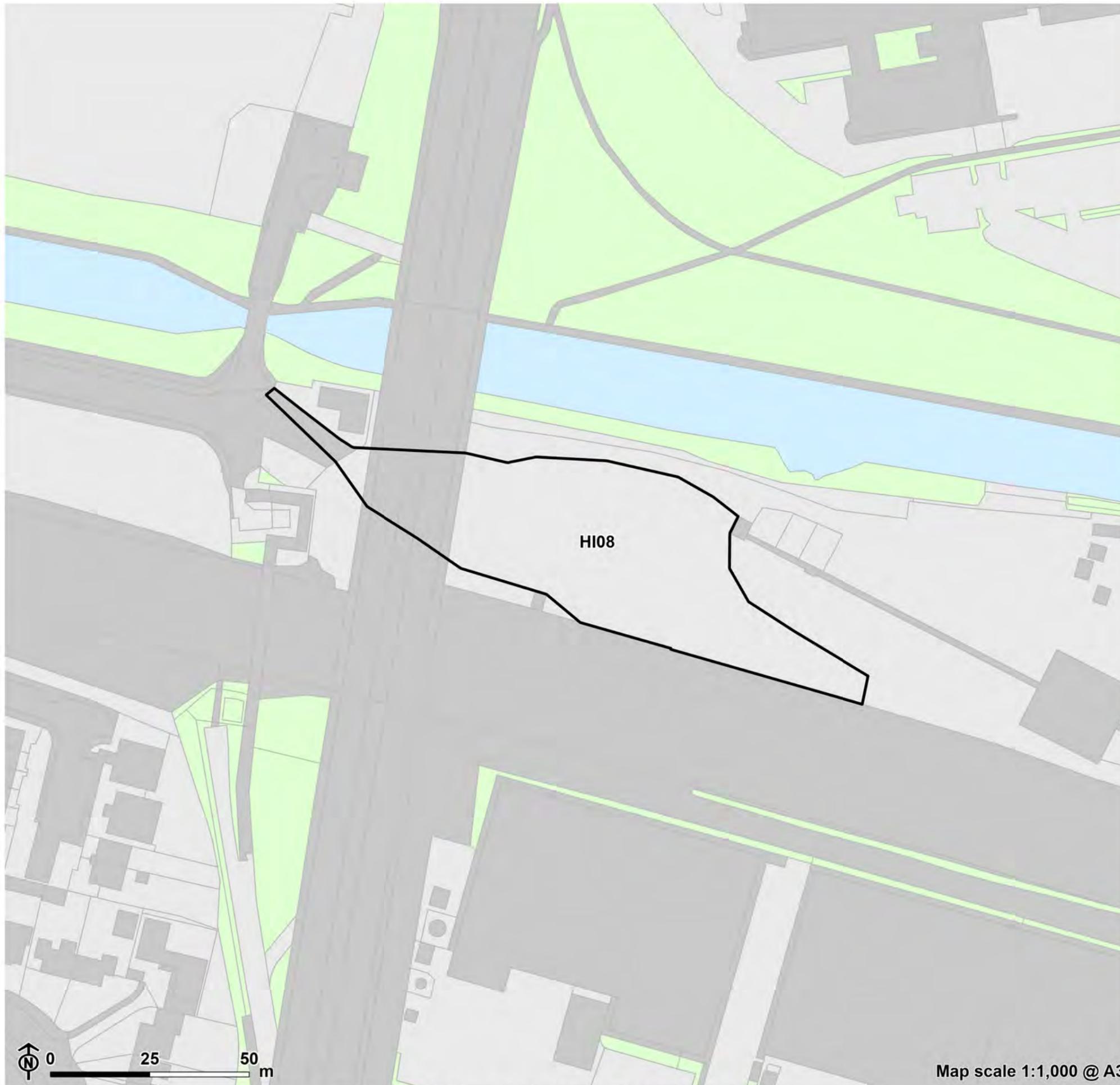


Figure 6: HI08 - West Drayton Aggregates

Site boundary



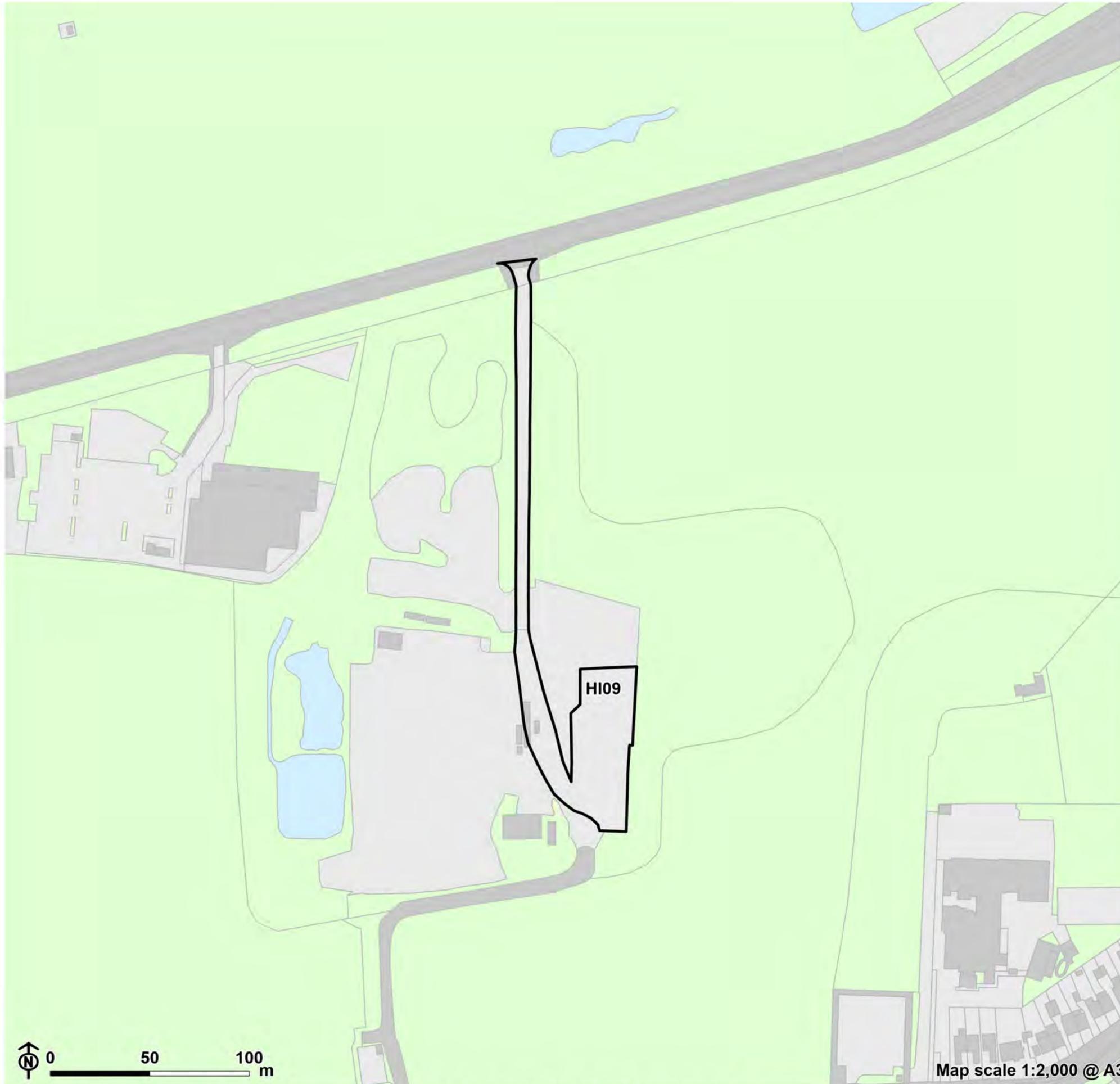


Figure 7: HI09 - Holloway Lane Materials Recycling Facility

 Site boundary



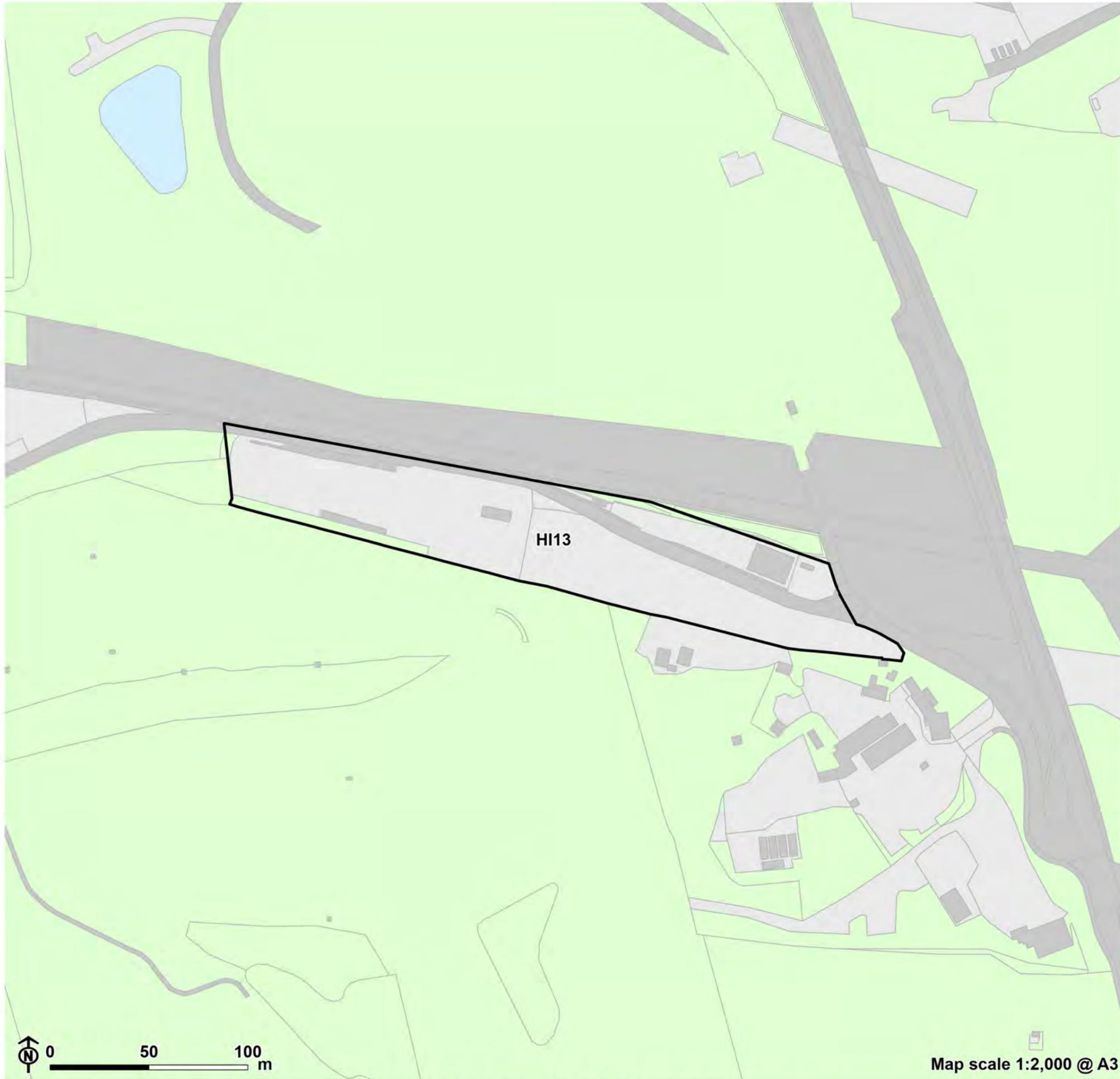
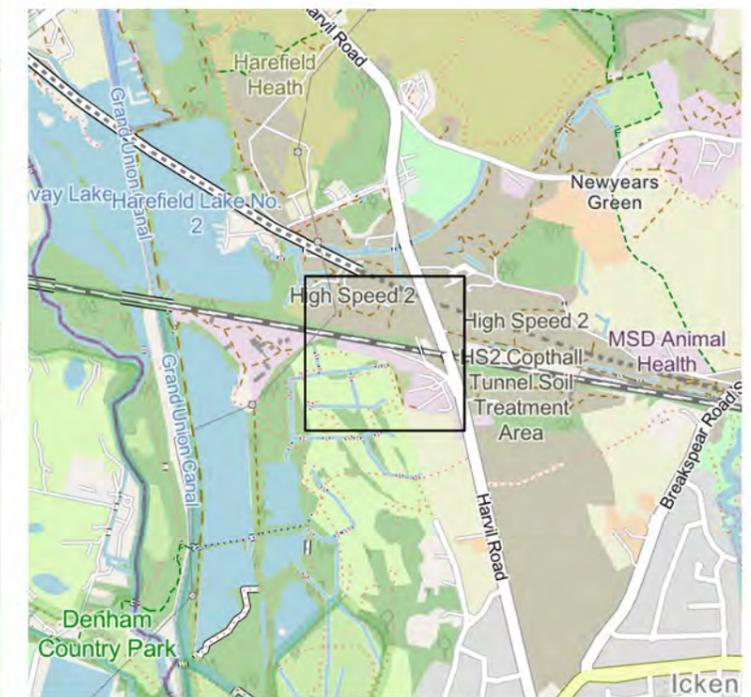


Figure 8: HI13 - Skip Lane, Harville Road (Sortera)

 Site boundary



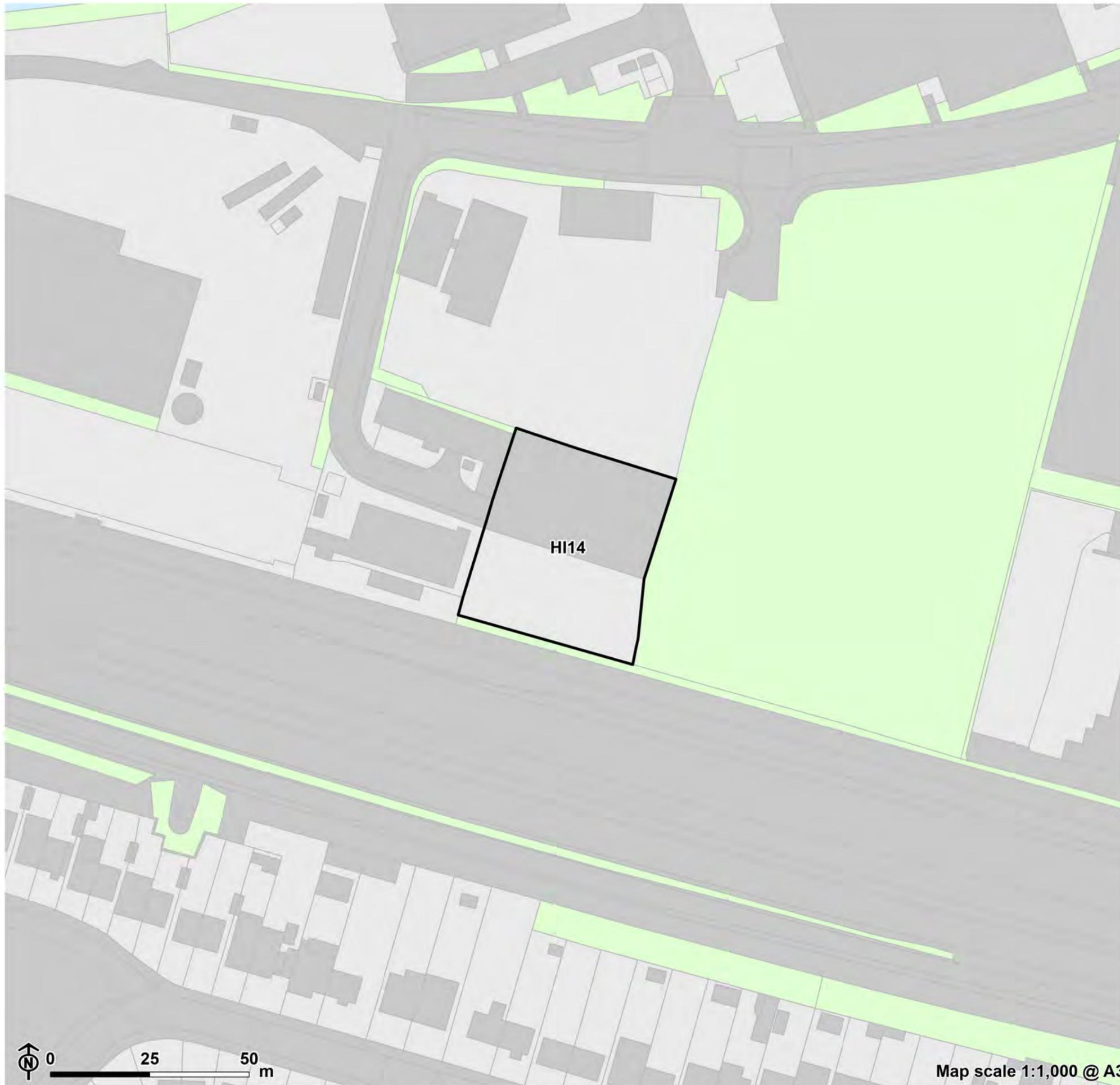


Figure 9: HI14 - Talking Rubbish Waste Transfer Station Rigby Lane

Site boundary

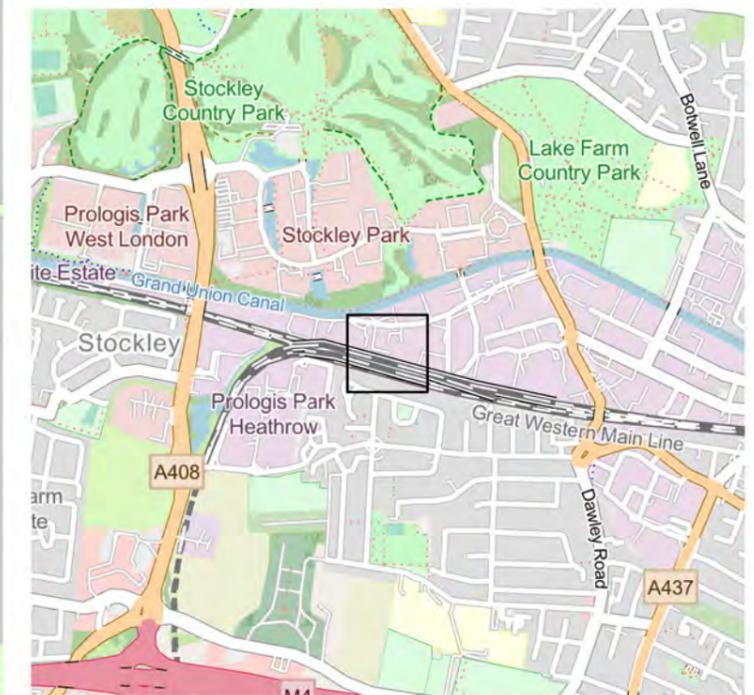
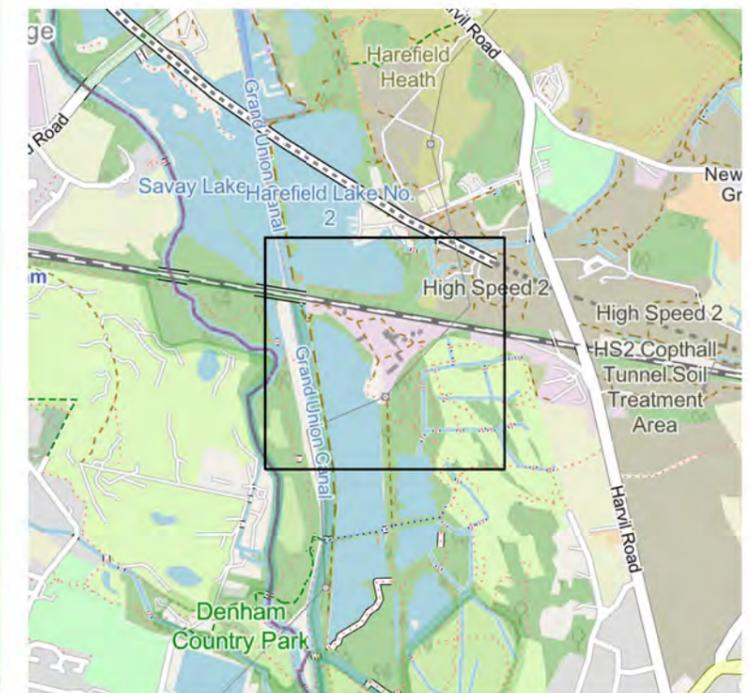
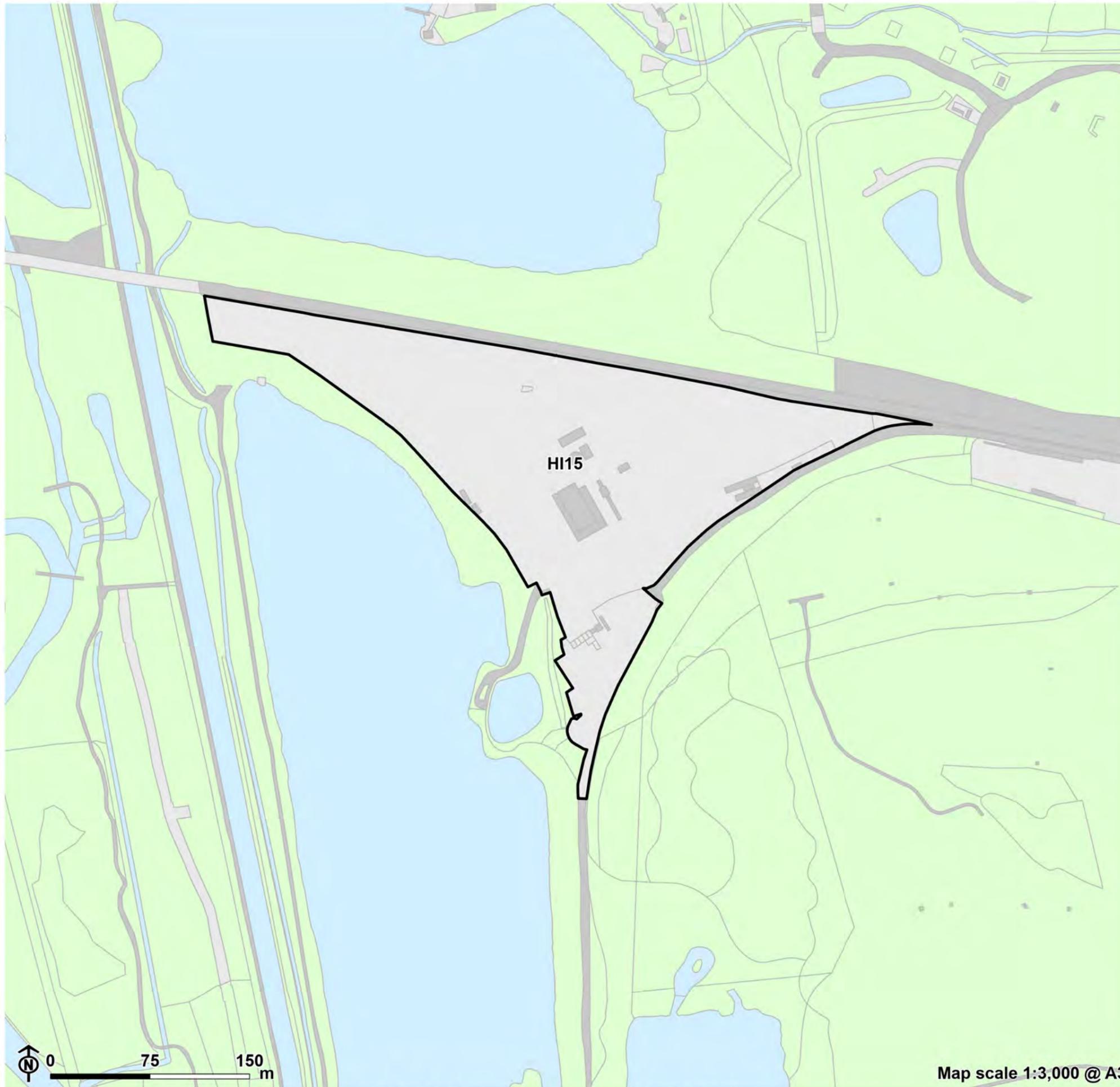




Figure 10: HI15 - Thames Materials Skip Lane

Site boundary



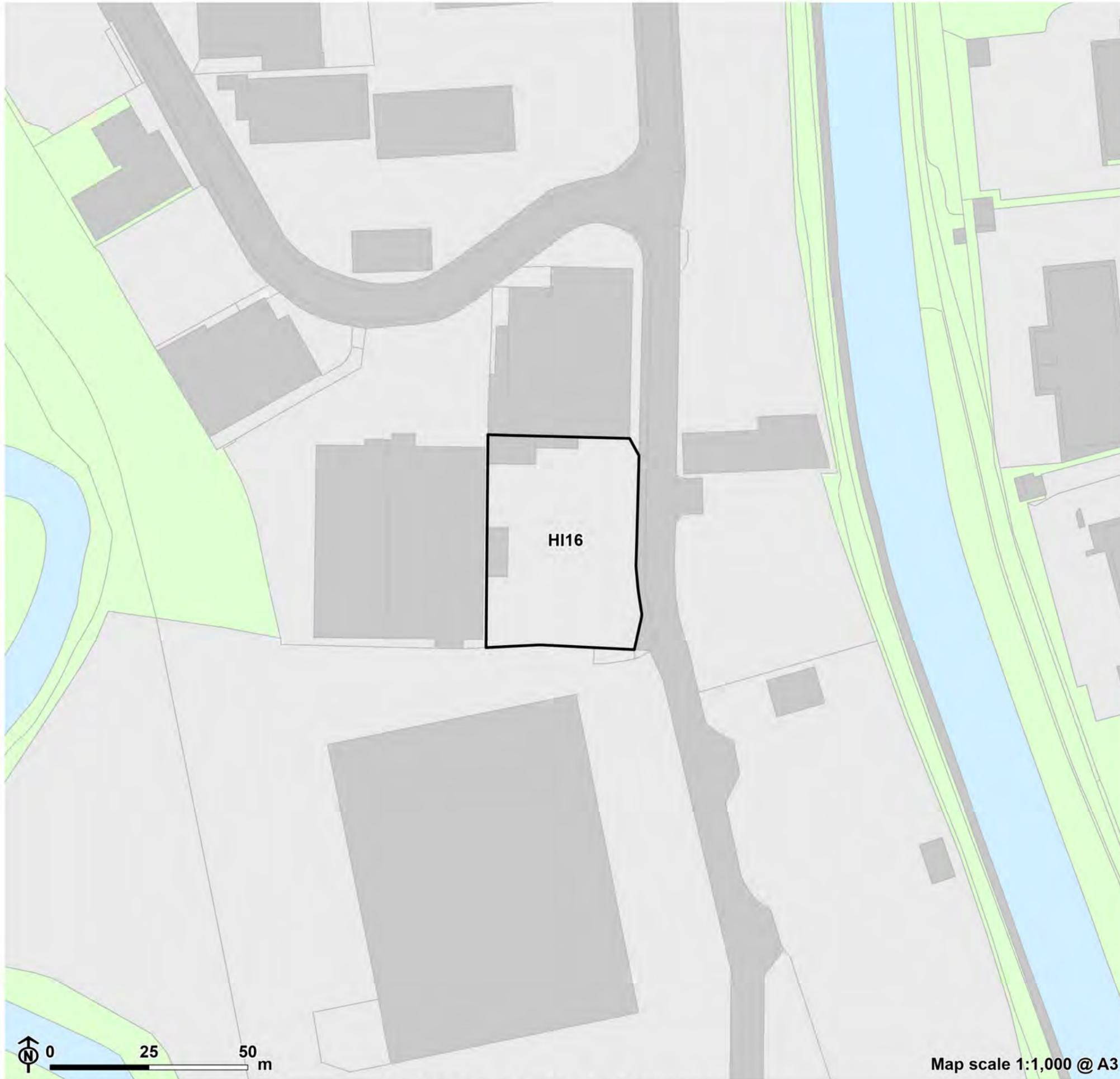


Figure 11: HI16 - Wallingford Road Recycling Facility

□ Site boundary



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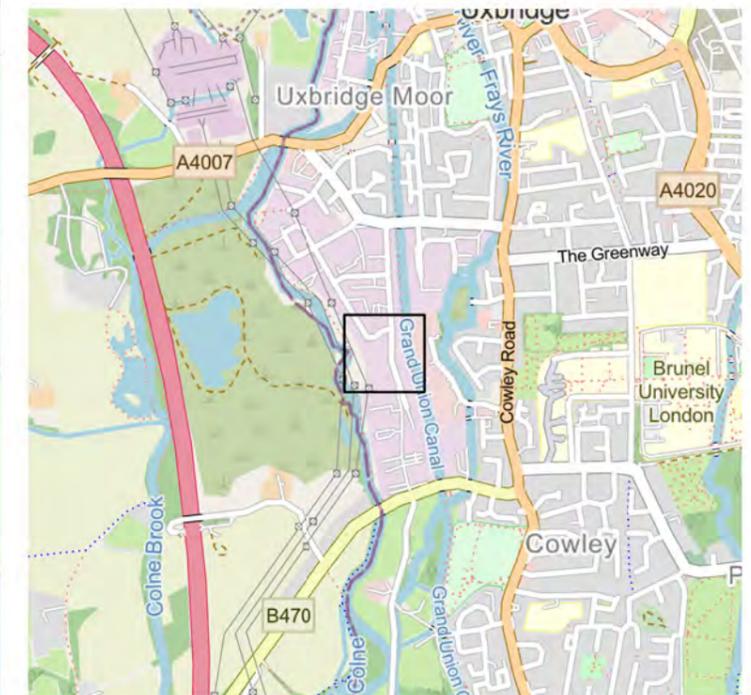
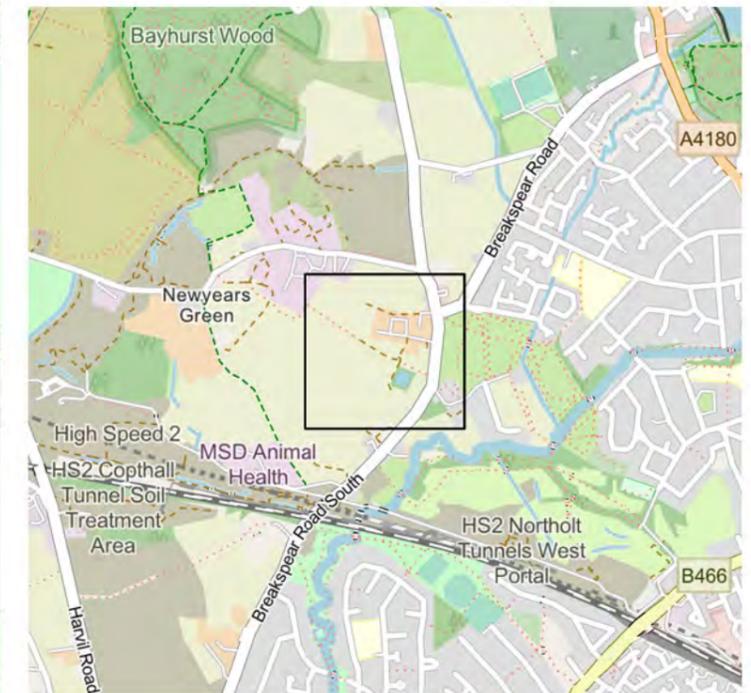
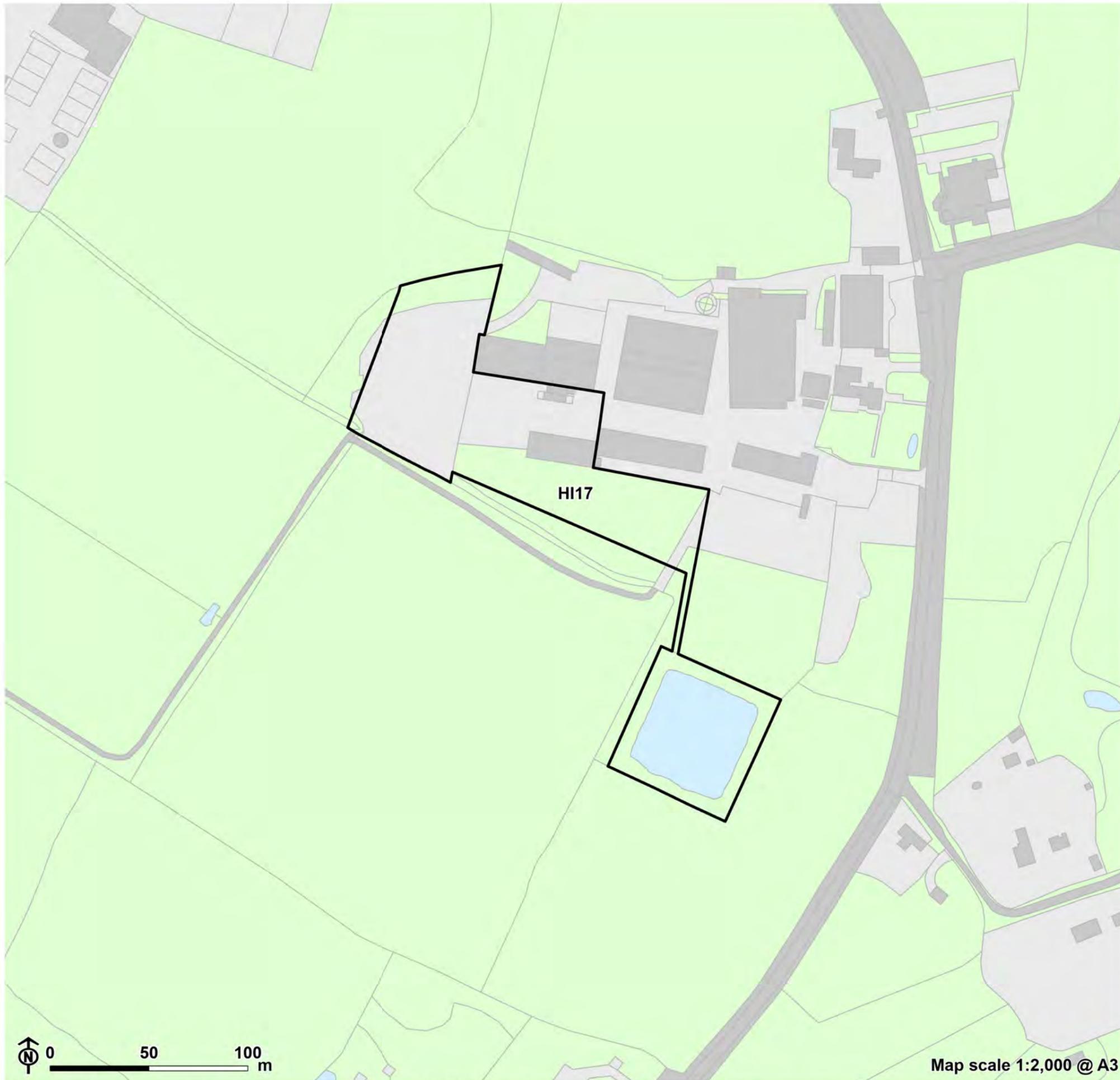


Figure 12: HI17 - Crows Nest Farm

Site boundary



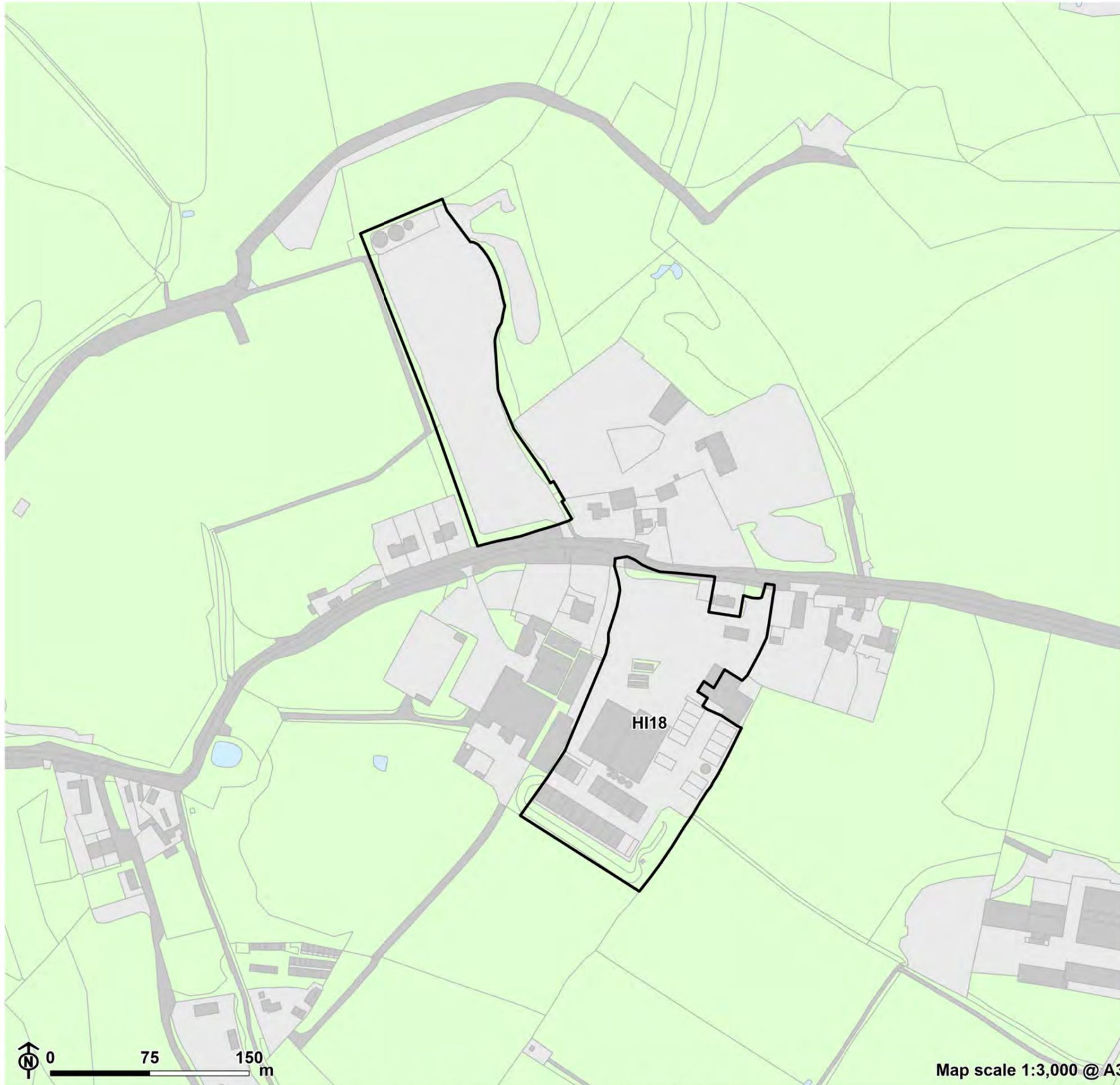


Figure 13: HI18 - High View Farm

Site boundary

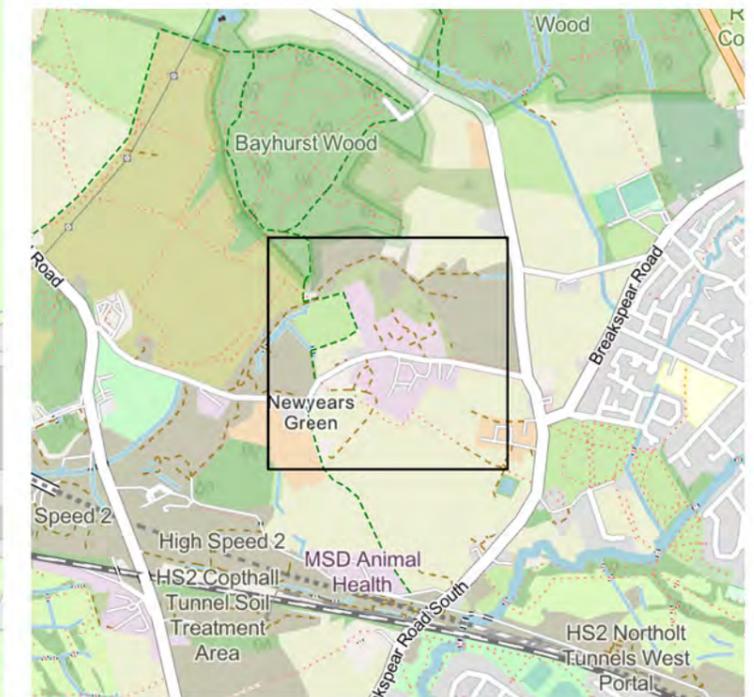
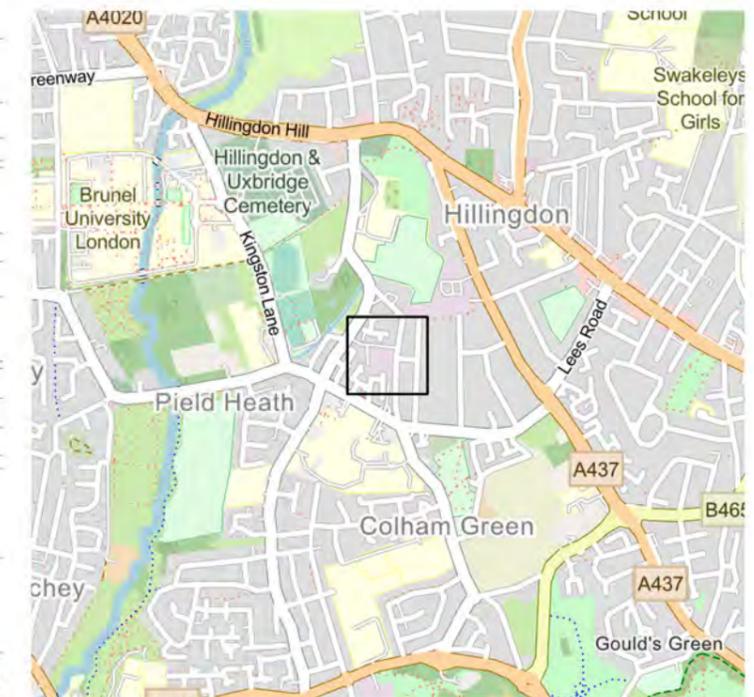
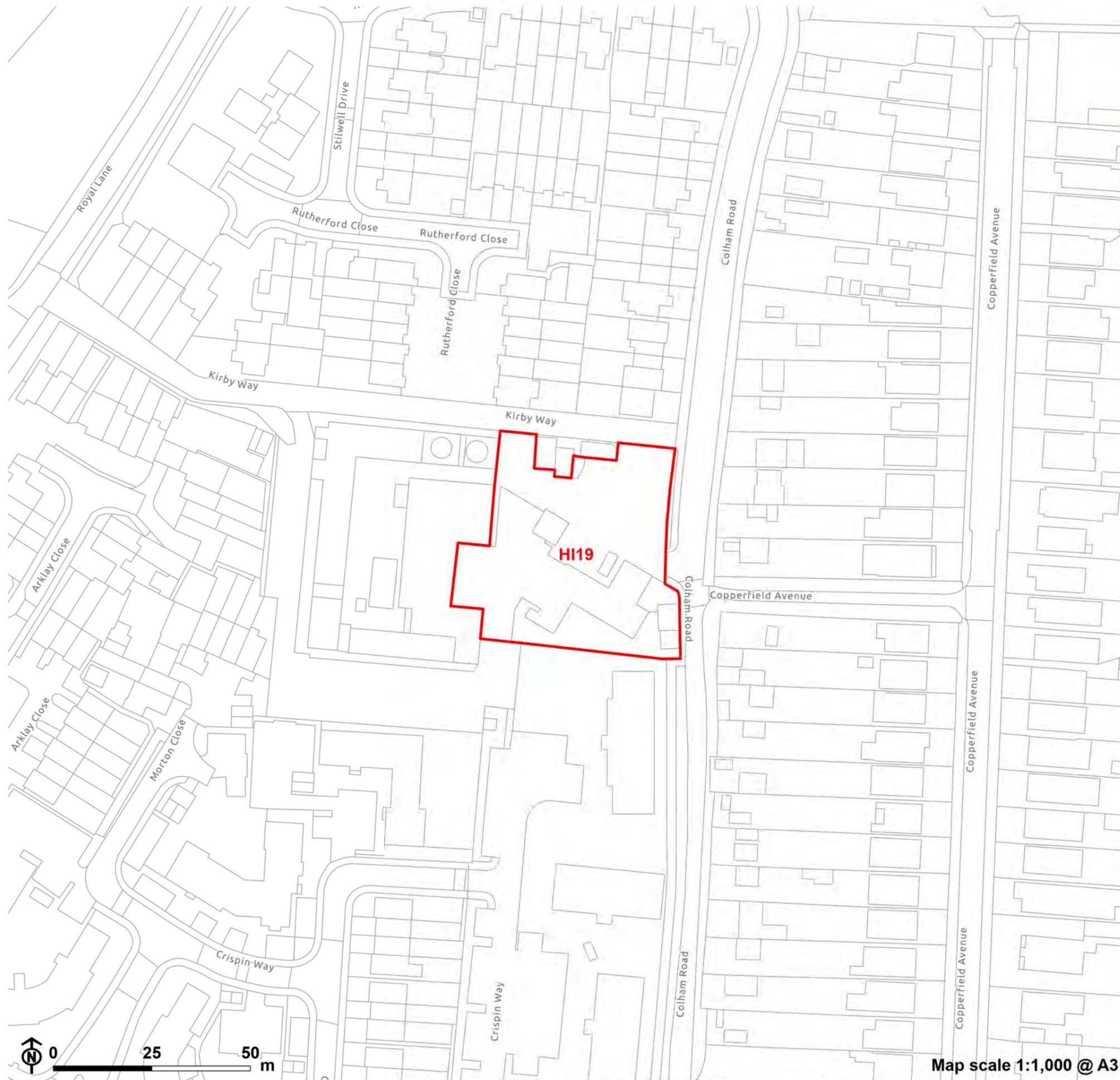




Figure : HI19 - Hillingdon Clinical Waste Incinerator

 Site boundary



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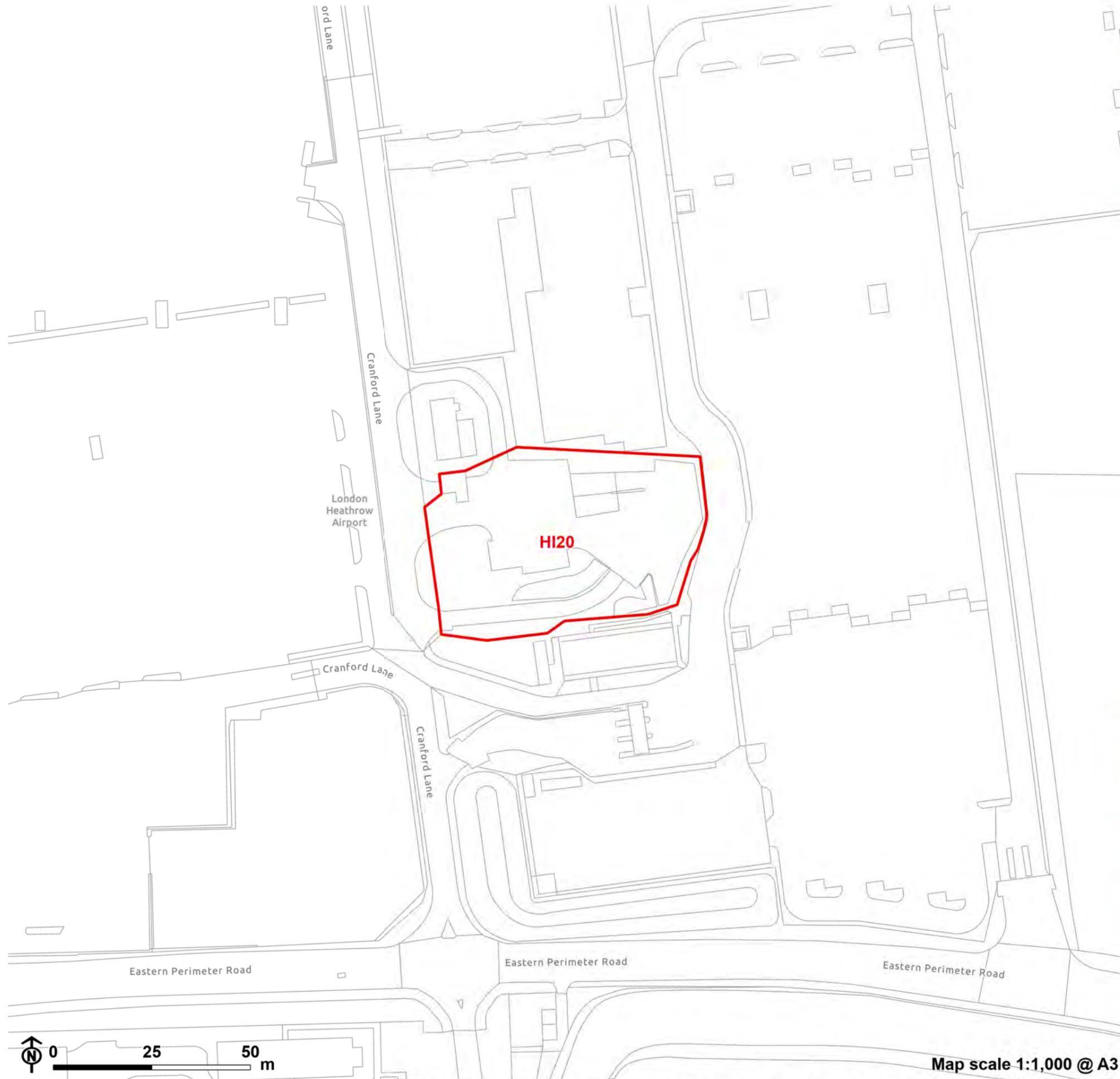


Figure : HI20 - Cranford Lane WTS, Heathrow

Site boundary



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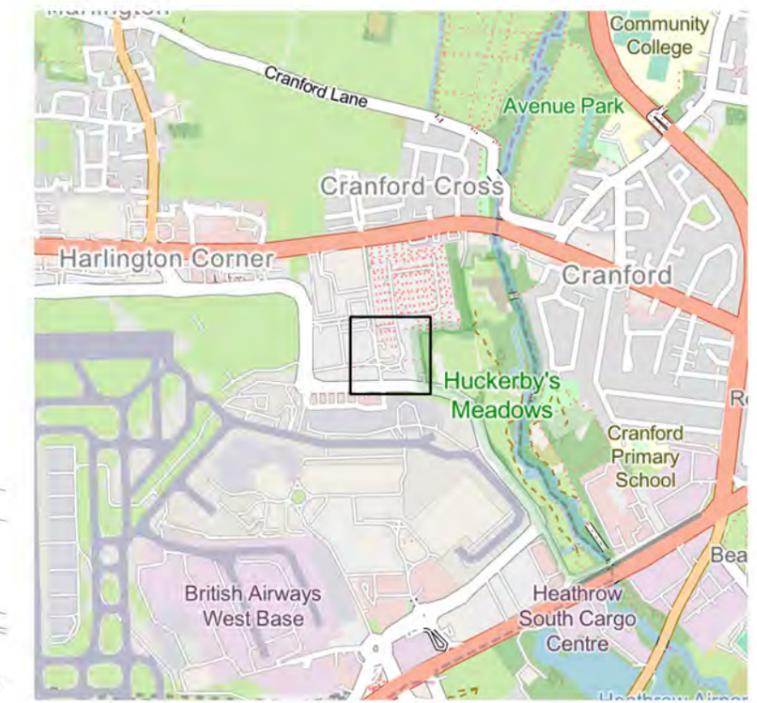
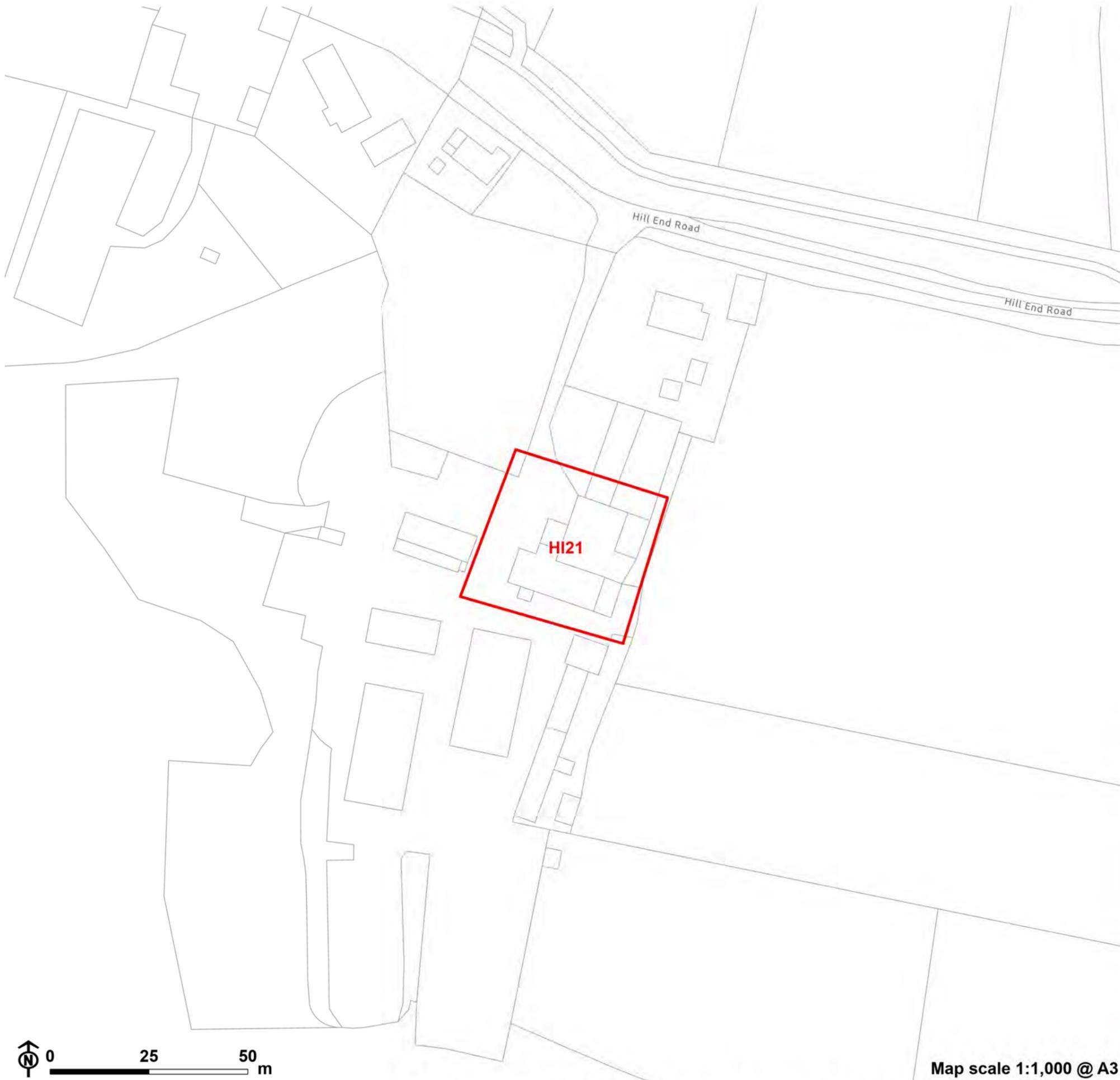


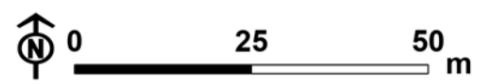


Figure : HI21 - Waybeards Farm, Hill End Road, Harefield

 Site boundary



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Map scale 1:1,000 @ A3

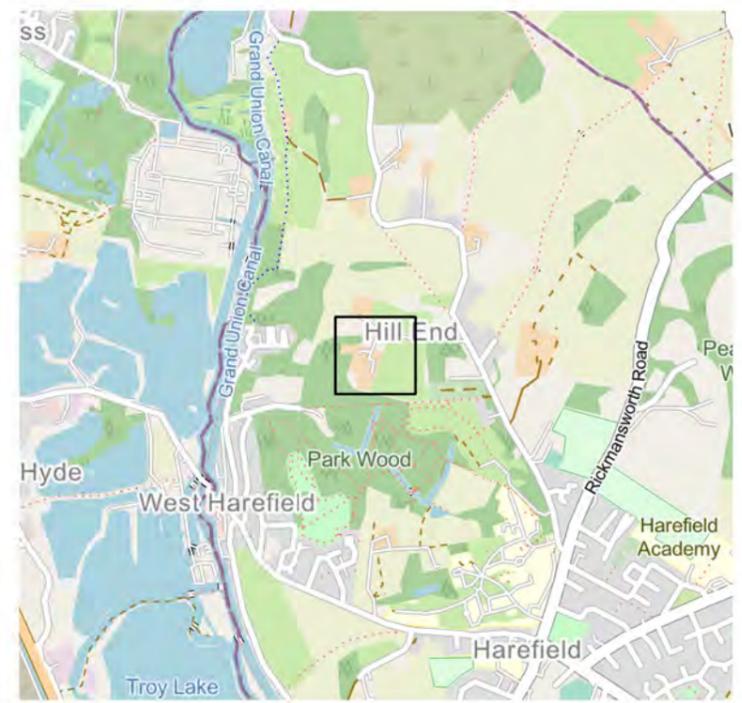


Figure 14: HI24 - Heathrow Depot



Site boundary

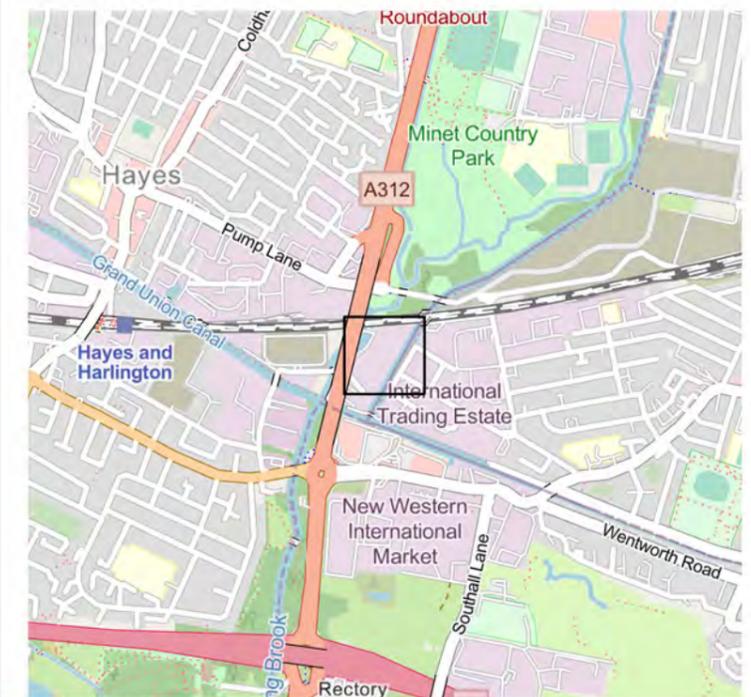
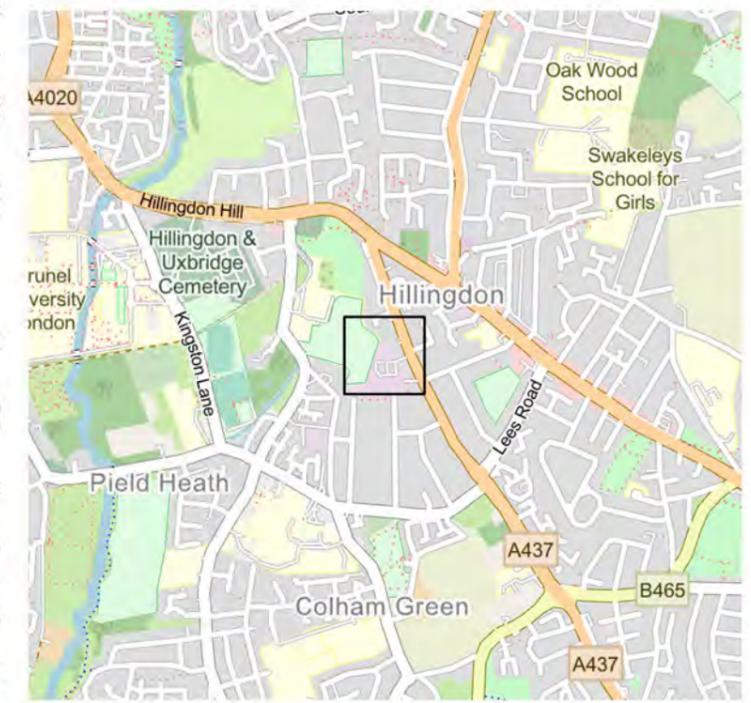
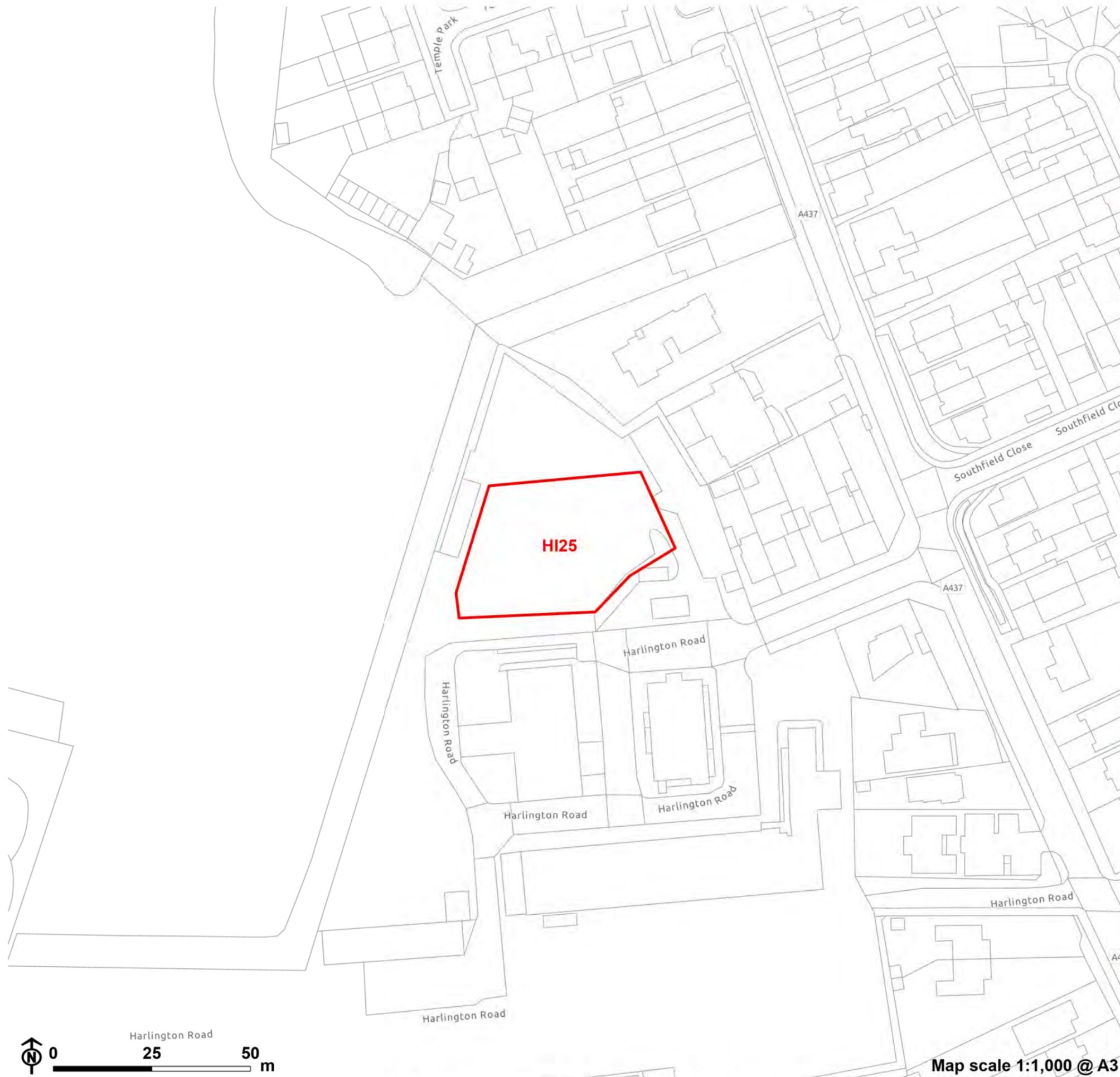




Figure : HI25 - Central Depot Harlington Road

 Site boundary



Map scale 1:1,000 @ A3



Figure 15: HI27 - Unit 1 & 2 Pump Lane Industrial Estate

Site boundary

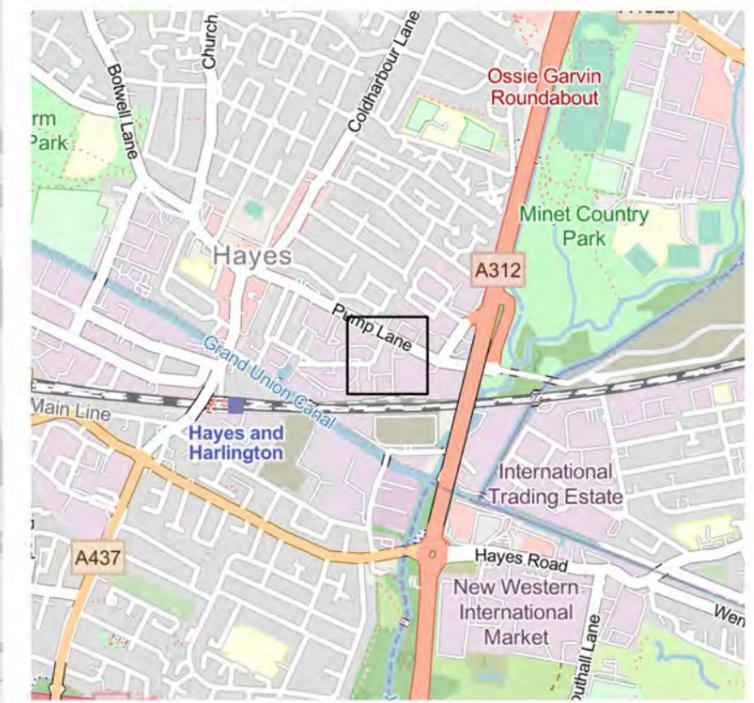




Figure 16: HI28 - Hayes Transfer Station, Rigby Road

Site boundary

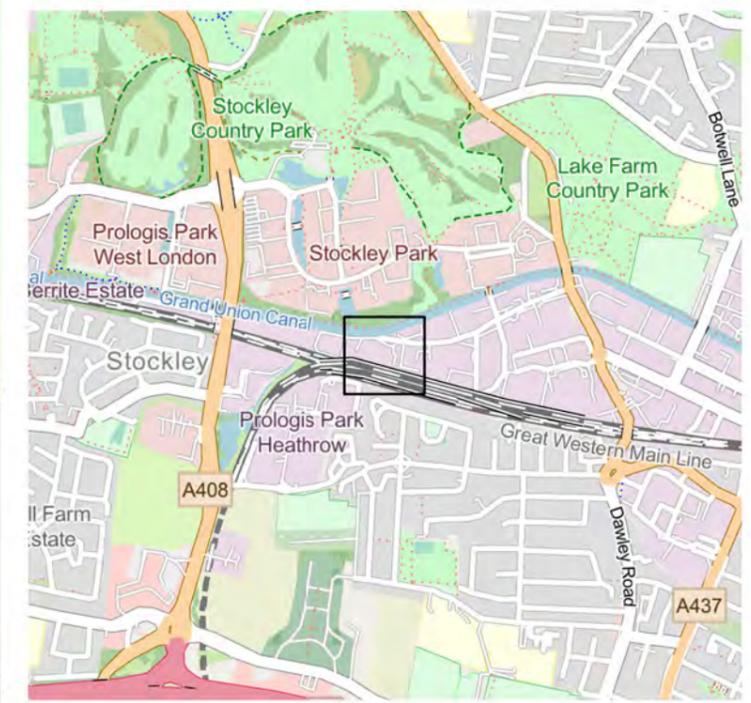
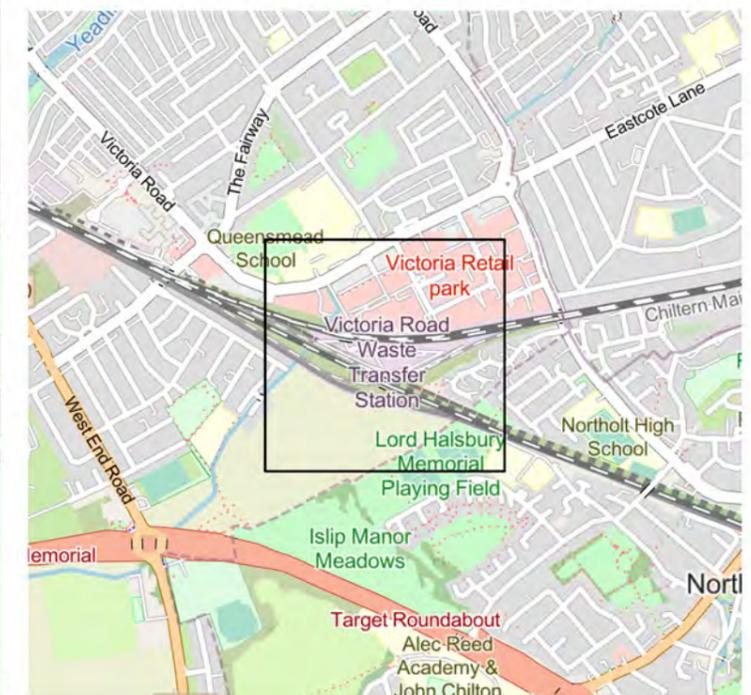
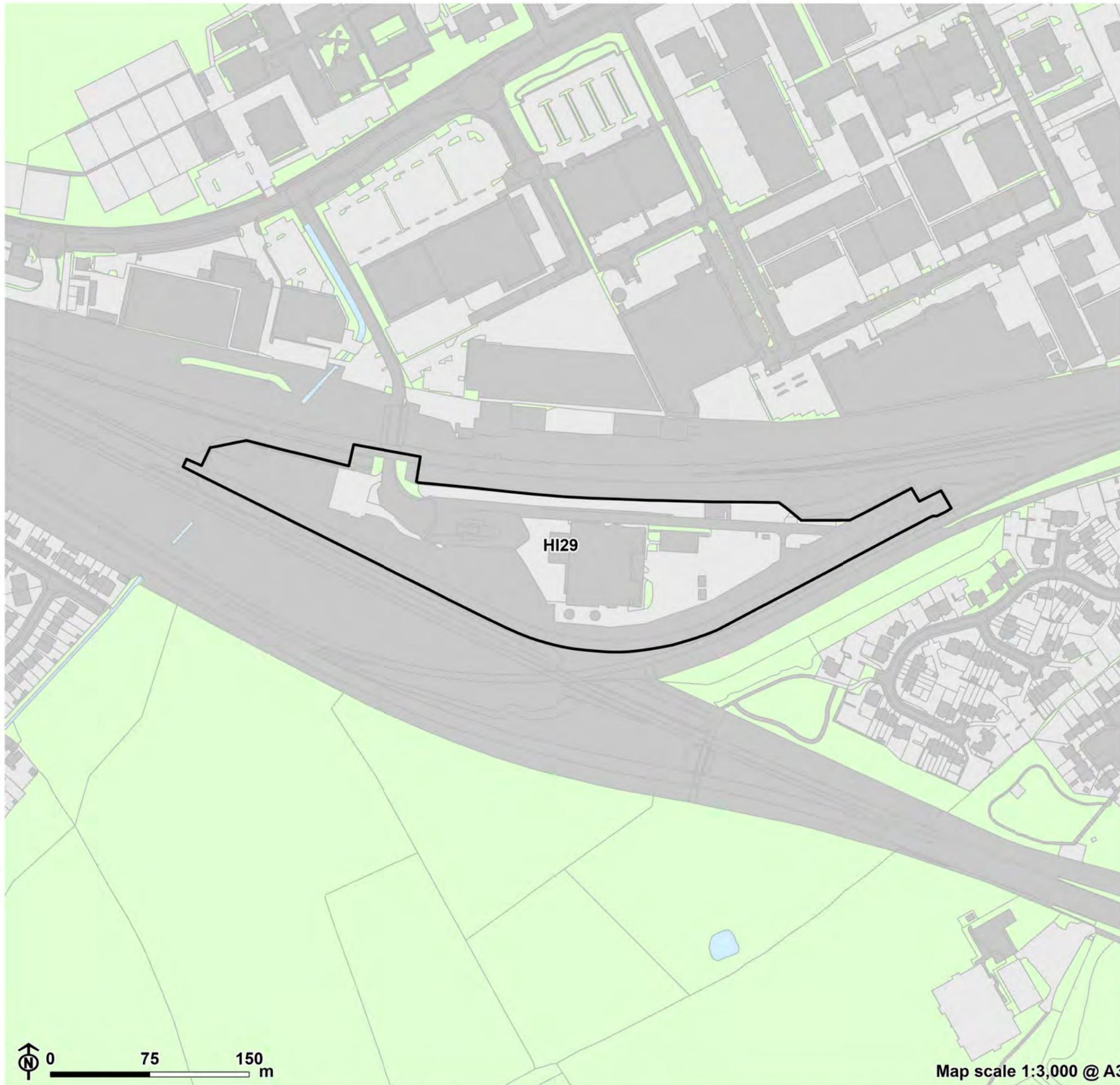




Figure 17: HI29 - Victoria Road Waste Transfer Station

□ Site boundary





Regulation 18 Draft Updated West London Waste Plan

LPA Member Sign Off

October 2025

Logos

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Abbreviations

AMR	Authority Monitoring Report
BAP	Biodiversity Action Plans
CCC	Climate Change Committee
CCS	Carbon Capture and Storage
CE	Circular Economy
C, D & E	Construction, Demolition and Excavation
C&I	Commercial and Industrial
HRA	Habitats Regulation Assessment
LACW	Local Authority Collected Waste
LNR	Local Nature Reserve
Mtpa	Million tonnes per annum
MBT	Mechanical Biological Treatment
NPPF	National Planning Policy Framework
OPDC	Old Oak & Park Royal Development Corporation
OS	Ordnance Survey
RBMP	River Basin Management Plan
RDF	Refuse Derived Fuel
RWS	Resources and Waste Strategy
SIL	Strategic Industrial Location
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
tpa	Tonnes per annum
WDI	Waste Data Interrogator
WLLPAs	West London Local Planning Authorities
WLWA	West London Waste Authority
WLWP	West London Waste Plan
WLWP 2015	West London Waste Plan 2015
WPA	Waste Planning Authority

1 Executive Summary

- 1.1 Managing waste is a key part of a well-functioning modern society. If waste is not handled in the right facilities or locations, it can harm both the environment and local communities. The National Planning Policy for Waste (NPPW) requires all waste plans to follow the *waste hierarchy*, which prioritises prevention, reuse, recycling, and then recovery over disposal. It also encourages managing waste close to where it is produced. Because of this, the future management of waste needs to be carefully planned for, and it is a statutory requirement for each waste planning authority to have a 'waste local plan' that sets out how and where waste is to be managed.
- 1.2 In west London, the adopted waste local plan, known as the 'West London Waste Plan 2015' (WLWP 2015), was adopted in 2015. It plans for the management of waste through to 2031 within the following London boroughs: Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames. Those parts of the boroughs of Brent and Ealing that fall under the planning jurisdiction of the Old Oak & Park Royal Development Corporation (OPDC) are also included. Together these seven local planning authorities are referred to as the West London Local Planning Authorities (WLLPAs).
- 1.3 Since 2015, both planning policy and the national waste management policy has changed. New waste management technologies, collection methods and understanding of the impacts of different approaches have also improved. Because of this, the WLLPAs decided to update the WLWP.
- 1.4 The updated version of the WLWP will cover all types of waste expected to be produced within west London during the Plan period. It will focus especially on the management of Household, Industrial, Commercial (HIC) waste, Construction, Demolition and Excavation (C, D & E) waste and Hazardous waste. In doing so the updated WLWP will take account of the requirements of the London Plan and the West London Waste Authority's strategy for managing Local Authority Collected Waste (LACW).
- 1.5 This document is the draft version of the updated WLWP published for public consultation. Once adopted, the WLWP will replace the WLWP 2015 and form part of each authority's wider development plan. It will sit alongside their adopted Local Plans, the London Plan and any relevant neighbourhood plan(s). The updated WLWP is designed to support existing planning policies rather than repeat them.

- 1.6 This draft emerging updated WLWP includes a Vision and five Strategic Objectives, along with six policies that will guide decisions about waste related planning applications, or applications for planning permission which would impact on safeguarded waste sites as follows:
- Policy WLWP 1 – Safeguarding and Optimising Waste Site Network
 - Policy WLWP 2 – Provision of additional Waste Management Capacity
 - Policy WLWP 3 – Residual Waste Management & Energy Recovery
 - Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities
 - Policy WLWP 5 – Recovery and Disposal of Waste to Land.
 - Policy WLWP 6 – Circular Economy & Resource Efficiency
- 1.7 These policies aim to ensure that waste related development, such as new or expanded waste management facilities, is well located and does not cause harm to local communities or the environment. They provide a clear framework to support waste management development to meet targets, protect existing capacity and allow for the release of land from waste use where appropriate.
- 1.8 A recent assessment shows that west London has more than enough capacity for the management of current and forecast future waste arisings, other than for landfill. This includes the amounts of HIC waste apportioned for management by each London Borough through the 2021 London Plan. Therefore, there is no immediate need for more waste management requirements within the Plan area.
- 1.9 The London Plan is under review. Once the new version is adopted, this updated WLWP may also need to be reviewed to ensure it aligns with it. For now, this draft version is considered to be in general conformity with the requirements of the 2021 London Plan.
- 1.10 The updated WLWP proposes to protect most existing waste sites in west London. It also supports additional waste development where such development will help achieve the Plan's goals. However, it does not identify specific areas of land for the development of additional waste management capacity.

2 Introduction and background

What is the West London Waste Plan?

- 2.1 The efficient and effective management of waste is an important aspect of a well-functioning society. While essential, waste management has the potential to cause impacts on the environment and communities if it is not undertaken in the right facilities located in the right place.

- 2.2 It is a statutory requirement for each area to have a 'waste local plan' that sets out how and where waste expected to be produced within the area is to be managed. Policies in waste local plans are used by the responsible decision maker, usually the Local Planning Authority (LPA) alongside policies contained in other development plan documents, to determine applications for planning permission relating to waste management development.
- 2.3 In West London, the current waste local plan, known as the 'West London Waste Plan' (WLWP 2015), was adopted in 2015 and plans for the management of waste over the period until 2031 within the following LPA areas located in west London ('the WLLPAs'):
- a. London Borough of Brent
 - b. London Borough of Ealing
 - c. London Borough of Harrow
 - d. London Borough of Hillingdon
 - e. London Borough of Hounslow
 - f. London Borough of Richmond upon Thames
 - g. plus those parts of Brent and Ealing that fall under the jurisdiction of the Old Oak & Park Royal Development Corporation.
- 2.4 Once adopted the updated joint West London Waste Plan (WLWP or 'the Plan'), will replace the adopted 2015 West London Waste Plan taking account of changes in policy and taking the planning horizon forward for another 15 years. The new West London Waste Plan will form part of each authority's Development Plan.
- 2.5 A map of the area covered by the Plan ('the Plan area') is presented in Figure 1. The other areas of London have either prepared, or are in the process of preparing, their own waste plans and planning policies so the requirements of the London Plan are met.

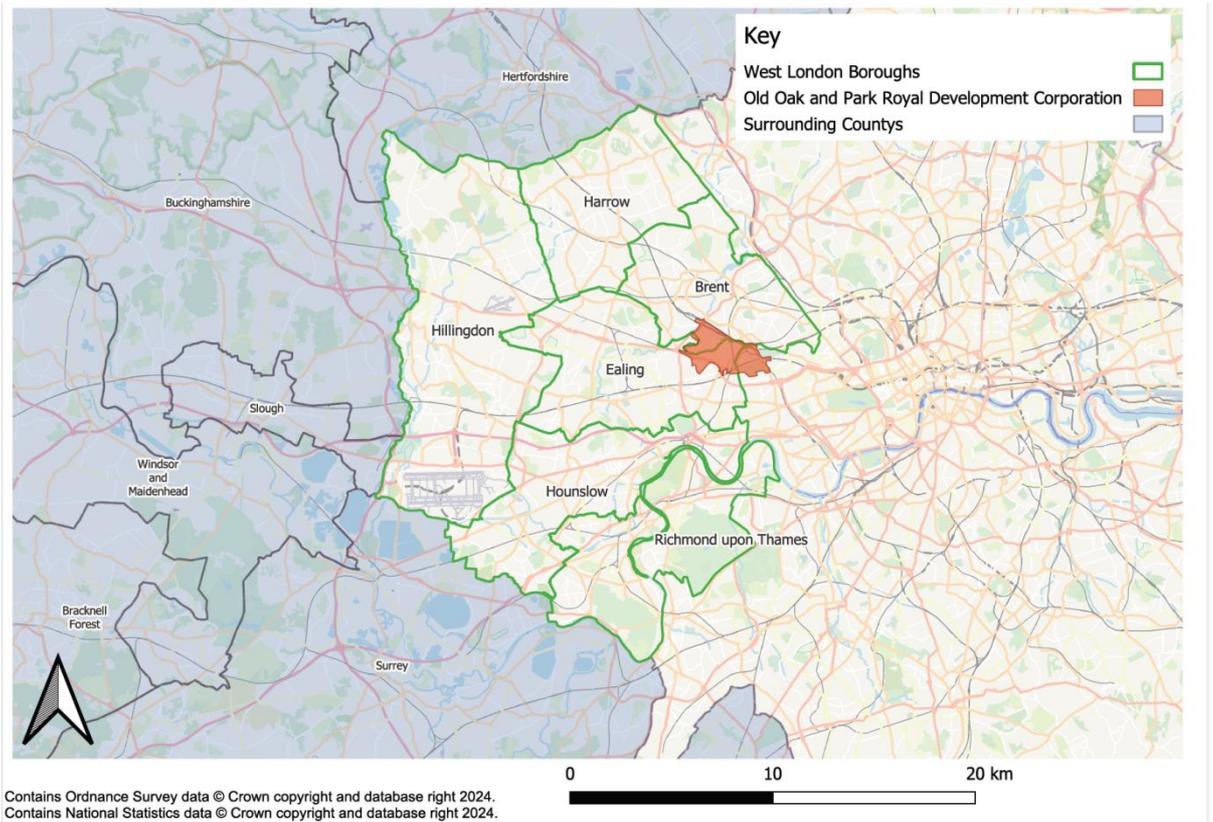


Figure 1: Area Covered by the updated West London Waste Plan (‘The Plan Area’) and wider context

The need to replace the current waste plan

- 2.6 Waste management is a rapidly evolving sector, shaped by new initiatives aimed at reducing waste generation and ongoing innovation in the way it is managed.
- 2.7 Since the current plan was adopted in 2015, a number of changes have occurred which include:
 - a. Changes in the planning policy landscape including:
 - i. a new London Plan published in 2021;
 - ii. several updates to national planning policy;
 - iii. new Local Plans adopted by WLLPAs; and,
 - b. Changes in the national waste management policy landscape including the introduction of Simpler Recycling requirements and a target to halve residual waste produced in England by 2042.
 - c. Evolution of waste management technologies, collection methods and better understanding of the impacts of different approaches.

- d. Current and emerging local conditions including pressure to release existing waste sites to alternative development, in particular that relating to alleviating the pressures in London for more housing.
 - e. Changes in patterns of waste production.
 - f. Emergence of the 'Circular Economy' as a concept to be embedded into planning policy to promote the management of waste in accordance with the waste hierarchy in priority order and thereby driving it up the hierarchy.
- 2.8 The WLLPAs will use the policies in this draft emerging WLWP when determining planning applications relating to waste management development, so it is essential that the Plan provides an up-to-date policy framework that reflects these changes to support the more sustainable management of waste that is produced.
- 2.9 Through safeguarding existing capacity and ensuring that additional waste management capacity provided within the Plan area is of the right type and in the right locations and contributes towards more sustainable management of waste when it is needed, this draft emerging WLWP will ensure that there continues to be sufficient capacity to manage waste in west London over the Plan period.

The process of preparing the West London Waste Plan

- 2.10 The process by which a Local Plan is prepared is prescribed in legislation¹ and policy² and Table 1 shows the related various stages with regard to the preparation of the new WLWP. The different stages provide opportunities for residents, businesses and other key stakeholders to comment and be involved in determining the content of the Plan. A 'Consultation Protocol' has been prepared that sets out in more detail how the WLLPAs are seeking to engage with communities and stakeholders during the preparation of the Plan.

¹ Planning and Compulsory Purchase Act 2004 and the Town and Country (Local Planning) (England) Regulations 2012

² National Planning Policy Framework, December 2024

Table 1: Anticipated Timetable for Preparation of the West London Waste Plan

Key Stage	Timeline
Draft emerging WLWP – 6/8-week public consultation ('Regulation 18')	End 2025
'Final' Submission WLWP published for representations ('Regulation 19')	Mid 2026
WLWP submitted for independent examination	Late 2026
Examination hearings (if needed)	Early/Mid 2027
Main modifications (if needed) published for representations	Mid 2027
Inspector's Report	Late 2027
Adoption	Late 2027/Early 2028

Key elements of the West London Waste Plan

2.11 The key elements of the emerging updated West London Waste Plan are:

- i. Vision
- ii. Strategic Objectives
- iii. Policies
- iv. Policies Map
- v. Monitoring Framework

2.12 Together, these elements will set out how and where the WLLPAs intend the management of waste to take place in West London

2.13 The Vision and Strategic Objectives set out how it is proposed that waste be managed to ensure it benefits, protects and enhances communities and the environment of west London. The Policies and Policies Map are intended to ensure the Vision is realised and the Strategic Objectives are achieved. To ensure the objectives of the Plan are being met and the Policies are working effectively, certain indicators will be monitored on a regular basis as set out in Appendix 1.

This stage of preparing the WLWP

- 2.14 Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires the Waste Planning Authority (WPA) to notify and invite representations from key stakeholders and communities on the content of the plan.
- 2.15 This draft emerging updated WLWP is the first formal opportunity for stakeholders to contribute to the draft emerging updated WLWP. The Topic Papers published alongside this draft emerging Plan explore the issues that affect the delivery of waste management capacity in West London.
- 2.16 The consultation, on this first draft of the emerging Plan, will run for a minimum period of eight weeks during December 2025 and January 2026. A ‘Consultation Protocol’ has been prepared that sets out how the WLLPAs are seeking to engage with communities and stakeholders during the preparation of the Plan.³ Following closure of the consultation period, the WLLPAs will publish a statement summarising the comments received and how each, if necessary, will be addressed in changes to the content of the emerging WLWP.

Supporting documents

- 2.17 This draft emerging updated WLWP is underpinned by supporting evidence including:
- a. Waste Capacity Assessment and Arisings Estimates
 - b. Strategic Waste Flows Report
 - c. Existing Safeguarded Sites for Release – Assessment Report
 - d. Integrated Impact Assessment comprising:
 - e. Sustainability Appraisal
 - f. Habitats Regulation Assessment
 - g. Climate Change Topic Paper
 - h. Circular Economy Topic Paper
 - i. Waste Management in West London Topic Paper
 - j. Strategic Flood Risk Assessment
- 2.18 The draft emerging WLWP and all evidence base documents can be found on the following website: <http://www.wlwp.net/>.

³ See *Consultation Protocol* October 2025. This is based on a distillation of each LPAs' own Statements of Community Involvement.

How to comment on the Regulation 18 Draft WLWP

- 2.19 A questionnaire has been prepared to help all stakeholders in West London respond to this consultation. The questionnaire is available online and at the Borough's main offices (and certain libraries in some LPA areas). There is also the potential for respondents to raise other issues that they consider the emerging Plan needs to take account of, which may need to be reflected in revisions to this draft emerging updated Plan. This includes inviting stakeholders to nominate sites for waste management facilities, either new or expansion to existing.
- 2.20 You can respond during the consultation period between December 2025 and January 2026 via the following email address: info@wlwp.net

3 The Plan Context

Spatial Portrait

- 3.1 This section sets out the key spatial characteristics and constraints affecting development involving the management of waste in West London, providing the context for the updated West London Waste Plan (WLWP).
- 3.2 West London is a diverse sub-region comprising dense urban centres, established industrial hubs, strategic transport corridors, and extensive green spaces. Waste management development in this area is shaped by a combination of opportunities and challenges. Strategic industrial areas provide essential locations for waste management facilities, while major regeneration areas are delivering new homes and employment space that will increase waste generation but also create opportunities for innovative and sustainable management solutions.
- 3.3 Waste management development is constrained by the presence of residential areas and other sensitive land uses particularly, Green Belt, Metropolitan Open Land (MOL), heritage and conservation designations, ecological protections, and widespread Air Quality Management Areas (AQMAs).
- 3.4 Transport infrastructure, including road, rail, and waterborne freight networks, also plays a critical role in determining where waste produced in West London ends up being managed.
- 3.5 These unique spatial characteristics determine the location of existing waste management facilities within each local planning authority area, and availability of land to support expansion of the network where needed.

Local Planning Authority-Level Summaries

London Borough of Brent

- 3.6 In Brent, Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) in Wembley, Neasden and Alperton currently host waste management facilities. Growth and regeneration across the borough are driving high-density development, which requires integrated waste solutions. Road transport is supported by the A406, A5, and M1 corridors, though congestion is a major challenge. Railheads for materials transportation exist in Wembley and Neasden. Environmental and land-use constraints include AQMA coverage, flood risk along the River Brent, and the protected Welsh Harp Reservoir (SSSI). Brent currently accommodates 13 existing waste facilities adjudged to be lawful (excluding those located in OPDC), and its overarching strategy is to protect and modernise them while promoting low-carbon transport solutions. Three existing waste sites identified within the adopted Brent Local Plan for comprehensive, residential-led redevelopment are put forward in this Waste Plan to be considered for release from safeguarding, as their continued safeguarding and use for waste is likely to conflict with wider planning and regeneration objectives of the Local Plan.

London Borough of Ealing

- 10.1 Ealing's strategic industrial areas — including Greenford, Perivale, Northolt, and Southall — host several waste management facilities. The Southall Opportunity Area is expected to generate significant additional waste, highlighting the need to embed circular economy principles into development. The A40, A406, and Uxbridge Road provide vital transport routes, with further potential for rail-based waste movement. Future development is constrained by AQMA coverage, Green Belt land, and flood risk in Southall and Acton. With 14 existing waste management facilities in operation adjudged to be lawful (excluding those located in OPDC), Ealing's strategy is to safeguard existing suitable sites, establish circular economy hubs, and expand rail-based freight transport.

London Borough of Harrow

- 3.7 Harrow has limited industrial land, with only Wealdstone and Honeypot Lane designated as SIL or LSIS. Regeneration in Wealdstone and Harrow Town Centre will increase waste production, but space for new waste management facilities is scarce. The borough lacks major highways or rail freight links, making it reliant on local road transport. Additional constraints include AQMA coverage and significant areas of Green Belt. Harrow currently hosts only two existing waste management facilities adjudged to be lawful, and its strategy is to protect and intensify their use where needed, while integrating waste infrastructure into any major non-waste developments and supporting localised recycling facilities.

London Borough of Hillingdon

- 3.8 Hillingdon benefits from industrial and transport hubs, including Heathrow Airport, Stockley Park, and the Hayes and West Drayton Corridor, which generate substantial commercial and industrial waste. Existing infrastructure includes the West Drayton Waste Transfer Station, the South Hillingdon Recycling Centre, and former mineral sites such as Harmondsworth Quarry. Transport strengths include access to the M4, A40, M25, and West Drayton Rail Freight Terminal, as well as the Grand Union Canal, which offers potential for non-road waste movement. However, Green Belt, AQMA coverage, and flood risk from the River Colne and canal present constraints. With around 23 existing waste facilities adjudged to be lawful, Hillingdon's strategy is to modernise and intensify existing sites where needed, expand sustainable transport use, and safeguard key facilities from displacement by redevelopment.

London Borough of Hounslow

- 3.9 Hounslow's Strategic Industrial Locations (SIL), including in Brentford along the Great West Road, and the North Feltham Trading Estate, and other local sites (LSIS), accommodate a number of existing waste management facilities. Growth pressures from the Great West Corridor and Heathrow Opportunity Areas are expected to increase demand for waste management capacity. The M4 provides a strategic road link, supplemented by rail freight at Transport Avenue and potential river transport via the Thames. Constraints include high air pollution along the A4/M4, flood risk in Brentford and Feltham, and extensive Green Belt. With 11 existing waste management facilities adjudged to be lawful, the borough aims to expand low-carbon waste management, modernise and intensify existing sites where needed, and increase sustainable waste movements through utilising river and rail-based waste transport options. One existing waste site identified within the adopted Hounslow Local Plan for comprehensive, residential-led redevelopment is put forward in this Waste Plan to be considered for release from safeguarding, as its continued safeguarding and use for waste is likely to conflict with wider planning and regeneration objectives of the Local Plan.

Old Oak & Park Royal Development Corporation (OPDC)

- 3.10 The OPDC area includes London's largest Strategic Industrial Location, accommodating around 2,000 businesses in sectors such as logistics, food production, and creative industries. It is also one of the UK's largest regeneration projects, supporting the delivery of tens of thousands of new homes and jobs. Existing waste management facilities are located within Park Royal SIL as well as in areas planned for new mixed-use neighbourhoods.

Transport links are strong, with the A40, A406, multiple rail connections, and the Grand Union Canal offering multimodal opportunities. However, constraints include AQMA coverage, the proximity of Wormwood Scrubs MOL, High Speed 2 (HS2) construction impacts, and flood risk from the canal. With five existing waste facilities adjudged to be lawful, the OPDC's strategy is to safeguard existing waste infrastructure when it doesn't conflict with wider development aspirations, embed waste solutions into regeneration, and promote rail and canal-based waste transport.

London Borough of Richmond upon Thames

- 3.11 Richmond upon Thames has the smallest industrial base in West London, with just four existing waste management facilities adjudged to be lawful, most notably the Townmead Road Council Depot, a Household Waste & Recycling Centre, a composting site in Kew Gardens and a dormant waste oil treatment site at Arlington Works. Regeneration in Mortlake, Twickenham, and Richmond will increase waste generation, but opportunities for developing additional capacity are extremely limited. The borough's constraints include extensive protected land, such as Richmond Park and Kew Gardens, alongside Green Belt, MOL, and flood-prone riverfront areas. The Borough is rich in built heritage and has a number of protected vistas/views. Transport capacity is constrained, though there may be limited scope for river-based waste movement on the Thames. Richmond's strategy is to safeguard existing facilities, integrate waste solutions into redevelopment where possible, and develop Circular Economy hubs.

Common Themes

- 3.12 Several themes emerge from the above Plan area analysis.
- 3.13 First, competition for land and conflicting uses highlight the need to safeguard existing waste management facilities, particularly where they are located on industrial sites. Waste management facilities are often under residential and commercial redevelopment pressure, while other brownfield land is productively used and designations such as Green Belt and MOL apply to greenfield areas and limit opportunities for expansion. This means intensification and modernisation of existing waste sites should be prioritised.
- 3.14 Second, regeneration projects and circular economy initiatives present opportunities for integration of waste management. Growth areas will generate significant additional amounts of waste, but could also create opportunities for circular economy hubs, facilitating reuse and recycling of materials, and possible co-location of compatible industries.
- 3.15 Third, environmental challenges such as climate change require resilient infrastructure and low-emission technologies to protect air and soil quality, mitigate flood risk, and deliver biodiversity net gain.
- 3.16 Finally, transport and logistics remain a central concern. Congestion on key routes, including the A40, A406, A316, M4, and the North Circular hampers efficiency, while opportunities for rail and river freight at locations such as West Drayton, Brentford, the Grand Union Canal, and the River Thames should be fully exploited.

Proposed Planning Strategy

- 3.17 To address these issues, the planning strategy for waste management in west London focuses on two key areas:
- a. First, maintaining sufficient suitable management capacity by safeguarding key existing waste sites and allowing for the use of such sites to be intensified to meet emerging requirements where appropriate.
 - b. Second, high standards of environmental protections in line with best practice be applied to all facilities whether new or expanded, including robust emissions controls, enclosed operations, sustainable drainage systems, and climate resilience measures, ensuring that waste management safeguards health, enhances local amenity, and supports wider environmental goals. Finally, encouraging the increased use of low-carbon transport, with greater use of rail and river freight supported by electric and low-emission vehicles for road-based transport.

4 Waste Management in West London

- 4.1 The legal definition of waste, set out in section 75(2) of the Environmental Protection Act 1990⁴, is “..any substance or object which the holder discards, or intends or is required to, discard”. The key concept relates to the producer or holder's intention regardless of whether the waste may have a value to the recipient.

Scope of the emerging updated WLWP

- 4.2 The emerging updated WLWP will focus on providing for the principal types of waste produced within West London, which are as follows:

Local Authority Collected Waste (mainly household waste) (LACW)

- 4.3 Local Authority Collected Waste (LACW) consists of waste which comes into the possession of, or under the control of, the local authority including waste collected from households (household waste). LACW collected by or on behalf of the Boroughs can include household waste (residual, dry mixed recycling and food waste), street sweepings, green waste from maintenance of open spaces, and a small quantity of clinical waste⁵. Depending upon the local arrangements, LACW can include commercial waste collected by trade waste operations.

Commercial & Industrial Waste (from businesses & industry) (C&I waste)

- 4.4 Waste produced by businesses. A significant proportion of commercial waste (c60%) is also classed as 'municipal waste' and is therefore subject to statutory management targets that also affect LACW set out in a subsequent section of this draft Plan.
- 4.5 These first two categories (of LACW and C&I) are combined into a single category of 'household, industrial and commercial' waste in the London Plan ('HIC waste' for short). The London Plan apportions quantities of HIC waste arisings to each Borough within London for provision of management capacity through to 2041. It is this categorisation that is used throughout this Plan to reflect the influence of the London Plan on its approach/trajectory.

⁴ Transposing the Waste Framework Directive as amended 2008/98/EC.

⁵ Household clinical waste is not deemed hazardous unless a particular risk has been identified (based on medical diagnosis).

Construction, Demolition and Excavation Waste (C, D & E waste)

- 4.6 Construction, Demolition & Excavation (C, D & E) waste comprises waste arising from construction and demolition activity, including excavation during construction activities, and is made up of mainly inert⁶ materials such as soils, stone, concrete, brick and tile. However, non-inert elements such as wood, metals, plastics, cardboard, and offcuts of plasterboard may also be present in this waste stream. Due to their weight, the inert elements make up the majority (c.80%) of the total tonnage.
- 4.7 The London Plan deals with Construction and Demolition waste separately to excavation waste, as excavation waste is not normally suited to recycling, and this distinction is recognised in the waste evidence reports produced to support production of this Plan. The London Plan does not apportion quantities of C, D & E waste for management, but LPAs are still required to plan for this waste stream to meet national planning policy.

Hazardous Waste

- 4.8 Hazardous wastes are categorised as those that are harmful to human health, or the environment, either immediately or over an extended period of time. In West London, hazardous waste arises mainly from: construction and demolition activity, vehicle maintenance and/or dismantling activity and healthcare. Hazardous waste may also be present in C,D & E waste particularly when development takes place on brownfield sites that have been affected by historical contamination
- 4.9 The London Plan states that hazardous waste arising in the HIC waste stream (to which apportionments relate) includes hazardous waste, and therefore does not distinguish its management needs from the non-hazardous component of HIC waste. However, for the purposes of this Plan, all hazardous waste has been considered and planned for separately. Therefore, to some degree there will be an element of double counting between the London Plan apportionment values and the hazardous waste management capacity needs identified.

⁶ Inert waste is defined as “waste that does not undergo any significant physical, chemical or biological transformations”.

Existing Management Arrangements for West London's waste

- 4.10 This section sets out how the main waste streams relevant to the draft emerging WLWP are currently managed.

Management Profiles

Local Authority Collected Waste

- 4.11 In 2023/24 0.65 million tonnes of LACW was generated in West London, of which 0.43 million tonnes is managed through incineration with Energy from Waste (EfW) (at facilities outside of West London), 0.2 million tonnes recycled or composted, and only 101 tonnes managed through disposal to landfill.

Commercial & Industrial Waste

- 4.12 Data for the amount of C&I waste produced is not readily available as businesses are not currently required to report on waste produced. The London Plan 2021 estimates that this waste stream represented 28% of total waste arisings in London in 2015. This compares with household waste at 17% and C,D & E waste at 54%. If that % is applied to the LACW arisings for West London above, it indicates that arisings in the Plan area may be in the region of 1 million tonnes per annum.
- 4.13 The London Plan provides Borough level forecasts for arisings of HIC waste combined and these are presented in Table 2 below:

Table 2: London Plan Forecast Waste Arisings for the West London Boroughs

Borough	Waste Arising (tonnes per annum)	
	2021	2041
Brent	259,000	274,000
Ealing	291,000	306,000
Harrow	188,000	205,000
Hillingdon	347,000	365,000
Hounslow	260,000	275,000
Richmond upon Thames	179,000	190,000
Total	1,524,000	1,615,000

Given the known amount of LACW in 2023/24 was 0.65 million tonnes, that confirms the estimate for C&I waste arisings in West London to be c1 million tonnes. However, the management profile of this waste stream is not fully understood because it is not reported on separately.

Construction, Demolition and Excavation Waste

4.14 The production of C, D & E waste is influenced by large-scale infrastructure projects, as well as commercial and residential developments, which means that peaks and troughs in its production are often observed with arisings not following a regular pattern. Given it is a bulky and heavy waste type it does not tend to travel significant distances from source for management unless moved by rail or water.

Table 3: Non-hazardous C, D & E Waste arisings from West London 2020-2023 Mean (tonnes)

Category	Type	Tonnes	
C&D waste	Inert	538,506	1,134,622
	Non-inert	596,116	
Excavation waste	Inert	2,128,422	2,132,006
	Non-inert	3,584	
Total Non hazardous C, D & E waste:		3,266,628	

4.15 Different types of C, D & E waste require different forms of management. For example, hard inert materials (such as concrete, brick and road planings arising from demolition and road maintenance) can be recycled for use as an aggregate, while soft materials such as soils and sub-soils can be used for beneficial purposes such as the restoration of minerals workings and in other engineering projects. The non-inert component includes timber, plasterboard and plastics which may be recycled if separated. Ultimately there is very little C, D & E waste that cannot be recycled or recovered in some way.

4.16 Excavation waste will mainly be managed through the deposit on land for beneficial purposes. This may in certain cases be consented as non-waste development and, either be subject to an Environmental Permit as a recovery to land operation, or managed as non-waste under the CL:AIRE definition of waste protocol.

4.17 The management profile for Non-hazardous C, D & E waste (including inert waste) arising in West London in 2023⁷ is set out in Table 4 below.

⁷ At the time of writing 2023 Waste Data Interrogator (WDI) was the most current dataset available.

Table 4: Non-hazardous C, D & E Waste in West London - Waste Management Profile 2023 (% of Total Arisings)

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D Waste	Inert	25%	<1%	7%	7%	0%
	Non-inert	25%	<1%	<1%	35%	0%
	Subtotal C&D	50%	1%	7%	42%	0%
Excavation Waste	Inert	14%	65%	0%	21%	<1%
	Non-inert	<1%	0%	<1%	0%	0%
	Subtotal Excavation	14%	65%	<1%	21%	<1%

4.18 To summarise the management profile for non-hazardous C&D waste managed at permitted facilities is as set out below:

- At least 51% was managed through recycling or recovery;
- With 7% disposed at permitted landfills; and
- 42% transferred on for recovery or disposal.

4.19 Waste going for re-use may not be managed through permitted sites, plus a substantial proportion of C&D waste that constitutes hardcore may be converted into recycled aggregate and either used on site or sold offsite⁸. Hence the recycled/recovery value of 51% should be taken to be a minimum.

4.20 The management profile for non-hazardous excavation waste is as below:

- Just less than 80% was managed through recycling or recovery;
- With <1% disposed at permitted landfills; and
- c.21% transferred on for recovery or disposal.

Given that disposal would only be to landfill, and backfilling of mineral workings and other uses would be classed as recovery, it is considered highly unlikely that the inert fraction of this stream would end up being disposed of.

4.21 This compares with the targets for C, D & E waste management in Policy SI7 of the London Plan, *Reducing waste and supporting the circular economy: meet or exceed the targets for each of the following waste and material streams:*

- *construction and demolition – 95 per cent reuse/recycling/recovered;*

⁸ Data provided by the National Federation of Demolition Contractors.

- excavation – 95 per cent beneficial use overall and 100% of inert excavation beneficial used.⁹

Hazardous Waste

4.22 It has been estimated that around 52,500 tonnes of hazardous waste was produced in West London in 2023. The term 'hazardous waste' covers a wide range of waste types which each may require management at specialist facilities, and given they generally arise in relatively small amounts, such facilities are usually developed to manage quantities greater than that which would arise in a single Plan area.

4.23 The principal types of hazardous waste arising in West London making up 90% of the total arisings in 2023 are presented in Table 5 below. The five principal hazardous waste streams arose from construction activity, oil/ water separator cleaning, vehicle maintenance/ELV depollution, infectious clinical waste and Waste Electrical and Electronic Equipment (WEEE).

Table 5: Principal Hazardous Waste Component Arisings in West London 2023

Source: HWI 2023 (Environment Agency)

Hazardous Waste Type/Source	2023
C, D & E Waste	22,721
Oil/Water Separator Waste	7,159
Infectious Clinical Waste	6,323
WEEE	5,499
Vehicle Maintenance & ELV depollution	4,018
Total	45,720¹⁰

Flows to and from West London

4.24 Analysis of the best available data shows that significant quantities of waste are routinely transported between West London and other Waste Planning Authority (WPA) areas¹¹. This cross- boundary movement is typical of the way in which waste is managed in general. Table 6 shows the balance between waste exported from West London and received at West London waste management facilities in 2023. This indicates that overall, a balance is achieved with the exported amount equating to the imported amount. The totals shown in Table 6 do not correspond to the arisings totals given for each waste stream above. This is because an additional tonnage of C,D & E waste has been accounted for, that is not actually attributed to West London in the source dataset¹², the Waste Data Interrogator (WDI), and therefore cannot be

⁹ London Plan Footnote 164

¹⁰ Totals less than the 52,500t total above as these are the principal waste components.

¹¹ See 'Identification of Strategically Significant Cross Boundary Waste Movements from West London', BPP Consulting, October 2025

¹² See Construction, Demolition & Excavation Waste Arising in West London to 2041 BPP Consulting

allocated by management location.

Table 6: Adjusted Tonnages of West London waste managed in permitted facilities within West London and outside West London, and tonnage of imported waste to West London facilities
 Source: WDI 2023

West London arisings		Managed in West London		
	West London waste managed outside West London	West London waste managed in West London	Waste imported to West London	Total Managed in West London
	2,806,945	869,932	2,796,481	3,666,413
Total West London waste managed	3,676,877			

4.25 Figure 2¹³ displays the balance between imports and exports by waste management method and waste type to and from West London in 2023.

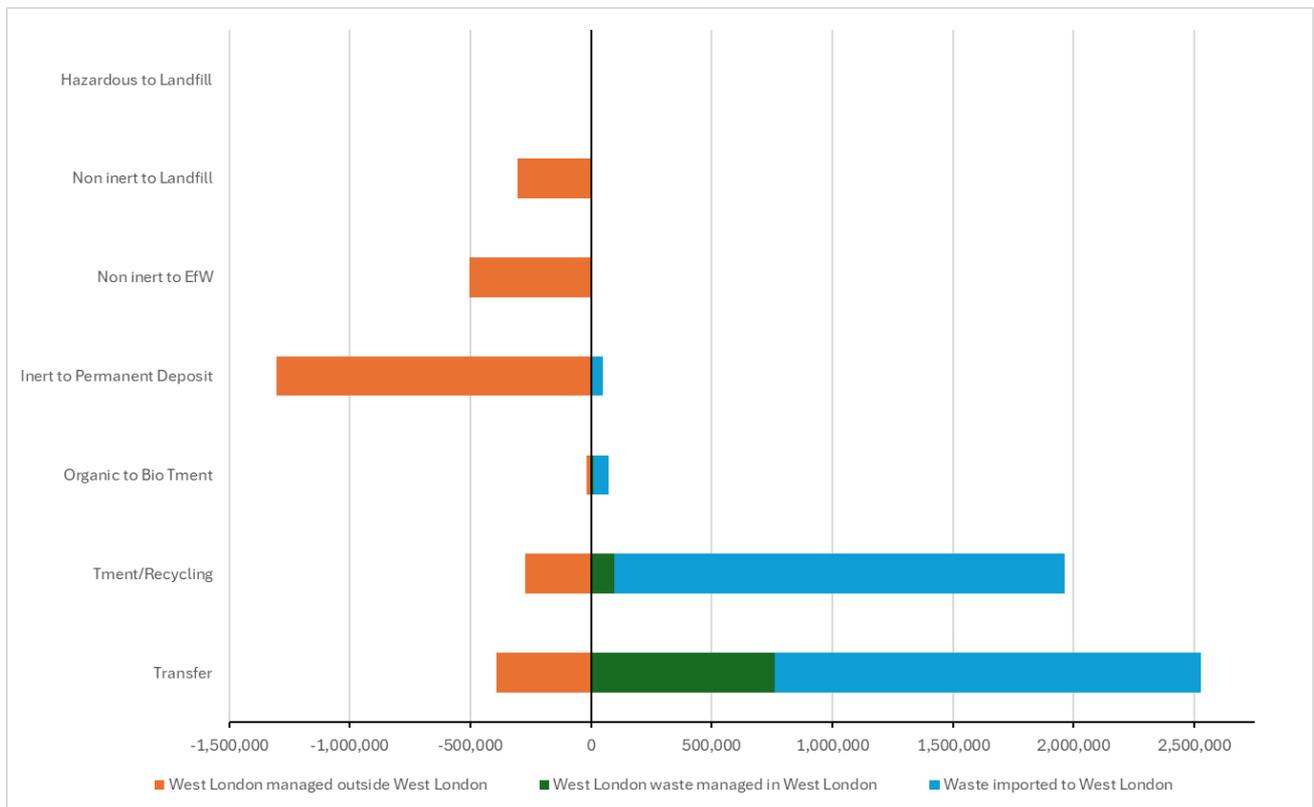


Figure 2:: Flows of Waste for Management at Permitted Facilities

October 2025

¹³ Note that Figure 2 only includes waste managed at permitted sites in England and does not include any waste exported to Wales, Scotland or further afield as this is not reported in the WDI.

4.26 Certain flows of waste from West London have been assessed to be of such a strategic nature to the management of waste arising in West London over the Plan period. The WPAs hosting the receiving facilities of this waste will be contacted to confirm that such flows may continue over the Plan period.

Existing Waste Management Sites in West London

4.27 There are a range of existing waste management facilities located in West London that manage waste both arising within and outside West London. It is intended that 68 sites would be safeguarded through the Plan for ongoing waste management uses and their location is shown in Figure 3 below.

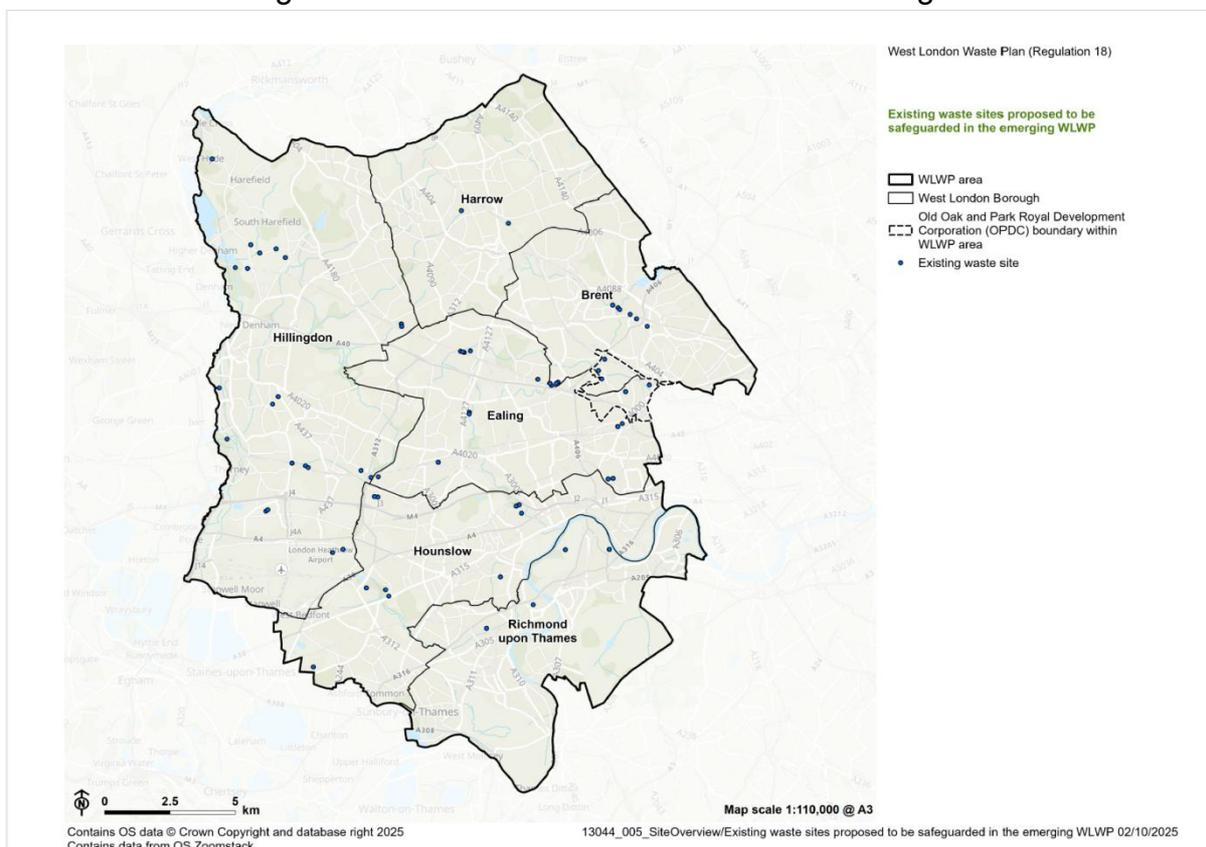


Figure 3: Map of West London Existing Waste Sites Proposed to be Safeguarded

5 The Policy Context

5.1 The policy context within which the new WLWP sits is illustrated in Figure 4 below.

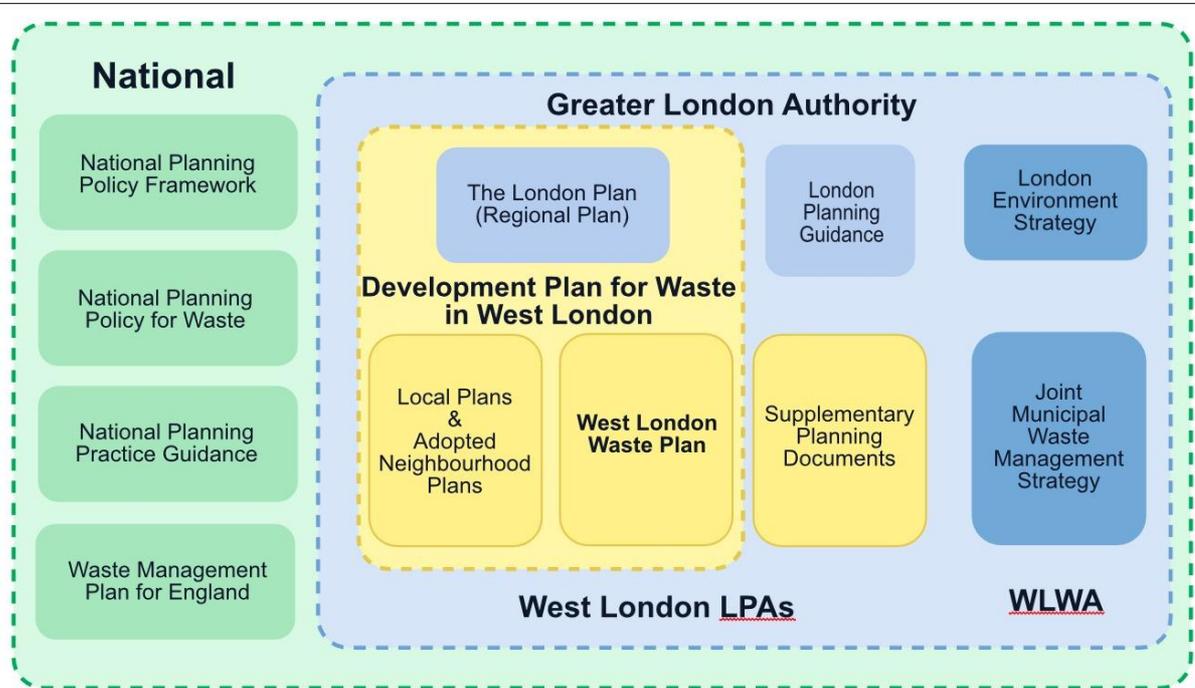


Figure 4: The Policy Context for the new WLWP

- 5.2 To be found sound the updated WLWP will need to be in general conformity with the London Plan and consistent with national policy. The WLWP is also aligned with the policies of the adopted Local Plans in West London. The WLWP may update relevant aspects of the Development Plan and where any conflict between policies exists the policy to have been adopted most recently generally takes precedent in decision making. Once adopted, the policies in the updated WLWP will supersede the policies in the existing WLWP. Appendix 4 sets out how the existing WLWP policies will be replaced by those set out in the updated WLWP.
- 5.3 Once adopted the updated WLWP will form part of the statutory development plan for the WLLPAs, to guide decision-making on planning applications in relation to waste management and related developments. The WLWP is in accordance with national policy by applying a presumption in favour of sustainable development. The Planning and Compulsory Purchase Act 2004 requires that “... for the purpose of making any determination under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise”.

- 5.4 The development plan is to be read as a whole. Most adopted plans within a borough's Development Plan, such as a Local Plan, are likely to have policies which are also relevant to a waste application. Each borough may also have adopted Supplementary Planning Documents which may be relevant. Furthermore, applications will also be decided according to the policies in the London Plan, which also forms part of the development plan. Therefore, when proposing waste related development, a number of adopted plans and supplementary planning documents will have to be consulted.

National Policy

- 5.5 The key objective of national policy for waste¹⁴ is to protect the environment and human health by:
- preventing or reducing the generation of waste;
 - where its production is unavoidable, reducing the adverse impacts of its generation and management; and
 - reducing the overall impacts of the use of resources from which waste may arise and improving the efficiency of such use.
- 5.6 The National Planning Policy for Waste 2014 (NPPW)¹⁵, associated Planning Practice Guidance¹⁶ and the Resources and Waste Strategy for England 2018 (RWS)¹⁷ currently set the national policy context for waste planning in England. Whilst the NPPF does not contain policies specific to waste, its principles remain relevant. The Waste Management Plan for England¹⁸ signposts policies concerning waste management in England.
- 5.7 The 'Waste Hierarchy' is one of the keystone principles of sustainable waste management and is enshrined into English Law. This categorises different methods of managing waste and ranks them in order of preference. This is illustrated in Figure 5 below. This shows that 'Prevention' is the most preferred option with 'Disposal' at the bottom being the option of last resort. Application of the Waste Hierarchy in priority order i.e. from the top down is a legal requirement¹⁹.

¹⁴ See *The Waste (England and Wales) Regulations 2011* and *The Waste (Circular Economy) (Amendment) Regulations 2020*

¹⁵ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

¹⁶ <https://www.gov.uk/guidance/waste>

¹⁷ <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>

¹⁸ <https://www.gov.uk/government/publications/waste-management-plan-for-england-2021>

¹⁹ Part 6 of *the Waste (England and Wales) Regulations 2011* sets out the duties placed on all planning authorities with regard to application of the hierarchy in decision making.

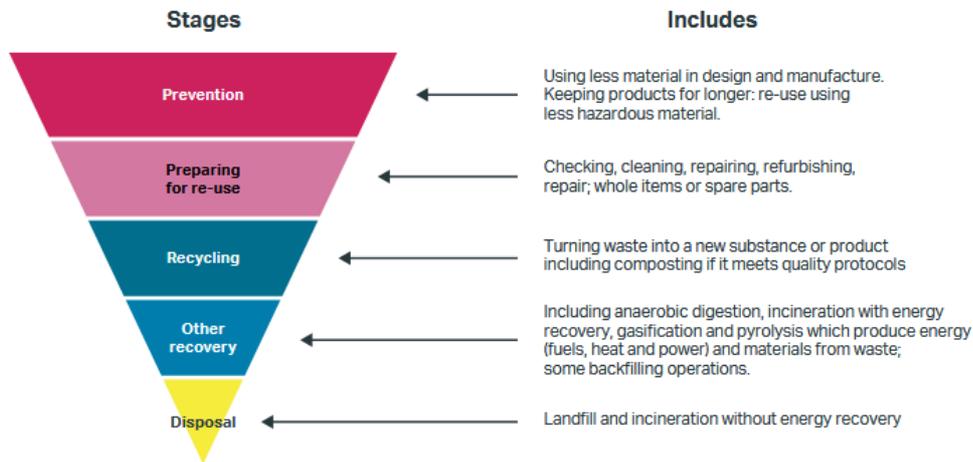


Figure 5: The Waste Hierarchy
 Graphic from the Mayor's Environment Strategy (Figure 44)

5.8 The RWS was published in December 2018 and set out Government thinking on waste management in England at that time. This included five strategic ambitions:

- To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025;
- To work towards eliminating food waste to landfill by 2030;
- To eliminate avoidable plastic waste by the end of 2042;
- To double resource productivity by 2050; and
- To eliminate avoidable waste of all kinds by 2050.

5.9 The RWS introduced the concept of Circular Economy into waste management policy for the first time. *The London Plan 2021* defines Circular Economy as "...where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste." (Para 9.7.1).

5.10 The central role waste management plays in the material cycle as part of more circular economy is illustrated in Figure 6 below.

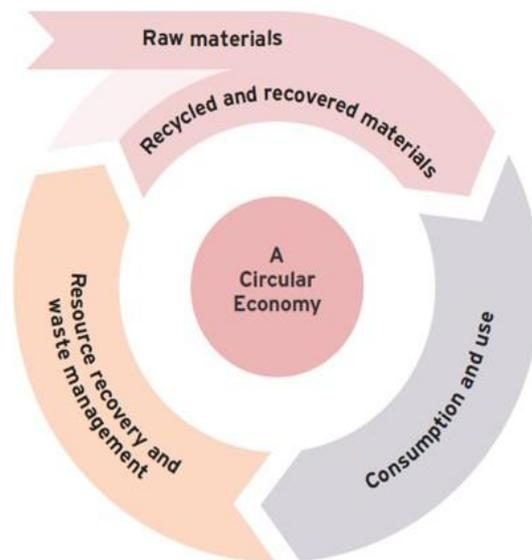


Figure 6: Circular Economy

Source: *Resources and Waste Strategy*, DEFRA, 2018

5.11 The Circular Economy is also a tool for tackling the climate emergency. When applied to the built environment, circular economy principles significantly reduce greenhouse gas emissions by avoiding extraction of raw materials, reducing production of virgin construction materials, retaining embodied carbon and eliminating waste.

5.12 The Government set the following targets in the Environmental Improvement Plan 2023²⁰ (EIP), which build on existing recycling and landfill diversion targets:

- eliminate avoidable waste by 2050 and double resource productivity by 2050;
- explore options for the near elimination of biodegradable municipal waste to landfill from 2028;
- eliminate avoidable plastic waste by 2042;
- seek to eliminate waste crime by 2042; and,
- halve ‘residual’ waste (excluding major mineral waste) produced per person by 2042.

²⁰https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1168372/environmental-improvement-plan-2023.pdf

5.13 The target for the reduction in residual waste is enshrined in *The Environmental Targets (Residual Waste) (England) Regulations 2023*²¹, which came into force on 30 January 2023. The waste target is for the reduction of residual waste (excluding major mineral wastes) on a kg per capita ²² basis by 50% by 2042 from 2019 levels (574 kg per capita). Accordingly, the residual waste long-term target is that by the end of 31 December 2042 the total mass of residual waste for the calendar year 2042 does not exceed 287 kg per capita. Waste routes which will count as residual are:

- sent to landfill in the United Kingdom;
- put through incineration in the United Kingdom;
- used in energy recovery in the United Kingdom; or
- sent outside the United Kingdom for energy recovery.

5.14 The EIP also set the following interim targets for the residual waste target to be achieved by 31 January 2028:

- Reduce residual waste (excluding major mineral waste) produced per person by 24%.
- Reduce residual waste (excluding major mineral waste) in total tonnes by 21%.
- Reduce municipal residual waste produced per person by 29%.

In addition, the following material specific targets were set:

- Reduce residual municipal food waste produced per person by 50%.
- Reduce residual municipal plastic waste produced per person by 45%.
- Reduce residual municipal paper and card waste produced per person by 26%.
- Reduce residual municipal metal waste produced per person by 42%.
- Reduce residual municipal glass waste produced per person by 48%.

²¹ *The Environmental Targets (Residual Waste) (England) Regulations 2023*
<https://www.legislation.gov.uk/en/uksi/2023/92/made>

²² Per head of population in England

5.15 In July 2023 the Government published a national waste prevention plan entitled ‘Waste prevention programme for England: Maximising Resources, Minimising Waste’²³. This document sets out how strategic principle 2 of the Resources and Waste Strategy – to prevent waste from occurring in the first place and manage it better when it does – is to be achieved.

5.16 The Plan also notes that:

- the Government intends to prepare a ‘Waste Sector Decarbonisation Plan’ that will set out how the waste sector will contribute to the targets in the 6th Carbon Budget (see below);
- the National Model Design Code published in 2021²⁴ provides tools and guidance for developers to embed circular economy principles in all new development including waste management facilities;
- NPPW expects planning authorities to ensure that new development includes proposals for handling waste arising from the construction and operation of development maximises reuse and recovery opportunities, and minimises off- site disposal; and,
- Chapter 2 of the NPPF recognises the need for the planning system to consider the prudent use of natural resources and waste minimisation in the pursuit of sustainable development.

5.17 In addition to the above, in 2024, the Government announced its ambition for the country to achieve a ‘zero waste economy’ by 2050.

5.18 In December 2024, The Government published a ‘Residual waste infrastructure capacity note’ indicating that, following the implementation of policies mentioned above, there would be sufficient residual waste infrastructure capacity to treat forecast municipal residual waste arisings in London. However, it did identify a possible capacity shortfall in London when all residual waste was considered, assuming that all such waste was suitable for diversion from landfill.²⁵

²³ <https://www.gov.uk/government/publications/waste-prevention-programme-for-england-maximising-resources-minimising-waste>

²⁴ <https://www.gov.uk/government/publications/national-modeldesign-code>

²⁵ It found that for London while 2.86 Mt of EfW capacity will be available, and the total quantity of residual LACW is 2.46Mt ie a 0.4Mt surplus, an additional 1.84Mt of residual municipal waste might require diversion, suggesting a possible capacity shortfall of 1.44Mt.
<https://www.gov.uk/government/publications/residual-waste-infrastructure-capacity-note/residual-waste-infrastructure-capacity-note>

Climate change

- 5.19 The Climate Change Topic Paper²⁶ accompanying the draft Plan summarises the measures that waste planning and management can take both to mitigate climate change, by reducing greenhouse gas emissions, and to adapt to its likely impacts.
- 5.20 In general, application of the waste hierarchy in priority order (and driving waste management as far up the hierarchy as possible) will reduce greenhouse gas emissions. This is reinforced by the application of life cycle assessment and circular economy approaches, which ensure that the environmental benefits of waste prevention, reuse, recycling, and recovery are maximised.
- 5.21 Diverting biodegradable waste from landfill reduces methane emissions, while diverting non-biogenic waste from inefficient incineration can avoid emissions by capturing its calorific value in more sustainable ways. Recycling generally offers greater avoided emissions than burning waste to recover energy, because it exploits the material value of both biogenic and non-biogenic waste, substituting for virgin materials and their associated carbon burden. Reuse extends the lifespan of products and reduces the need for replacement production, avoiding emissions that would otherwise be generated from both manufacturing and raw material extraction. Waste prevention avoids creating waste in the first place, for example through servitisation (replacing products with services), although the carbon benefits of such measures depend on renewable energy sources being used in service delivery.
- 5.22 Maximising carbon reduction benefits requires applying the hierarchy from the top down, rather than progressing from the bottom step by step. The scale of benefit varies according to the material involved (biogenic vs non-biogenic), the use to which it is put (for example, anaerobic digestion producing biogas for transport fuel compared with composting for soil conditioning or glass going back to remelt rather than aggregate production), and the transport requirements associated with different management methods.
- 5.23 Beyond the hierarchy, general mitigation measures include improving energy efficiency and increasing the supply and use of renewable and low-carbon energy and heat. Development should identify opportunities to source energy from decentralised systems and facilitate co-location of potential heat customers and suppliers, for example by linking waste management facilities with district heating networks.

²⁶ WLWP *Climate Change Topic Paper* BPP Consulting October 2025

- 5.24 Adaptation measures involve planning development in ways that avoid increasing vulnerability to climate change impacts. Where new development occurs in areas that are already vulnerable, risks must be managed through appropriate adaptation measures to ensure facilities remain resilient and effective in the long term.
- 5.25 Waste planning also has a direct influence over the type, quantity, and management method of waste. The spatial distribution of facilities is particularly important. From a mitigation perspective, spatial strategy can reduce emissions by locating facilities closer to major sources of waste, reducing the need for road transport, and encouraging use of rail or water freight. It can also promote co-location of synergistic waste operations that share energy or resources, and create synergies with other types of development, such as supplying heat and power to nearby commercial or residential development. From an adaptation perspective, spatial planning can guide waste development away from areas of existing or future vulnerability to flooding, water resource stress, water quality issues, coastal erosion, and land instability, consistent with the sequential approach set out in national planning guidance.
- 5.26 Development type, design, layout and operation are further areas where planning policy can exert influence. In terms of mitigation, this includes promoting the waste hierarchy by minimising landfill, maximising recycling and recovery, and enabling the lowest-carbon waste management solutions. Built facilities should be designed for energy efficiency, utilise renewable and low-carbon energy sources (including those generated on site), and connect to local energy networks where possible. Waste management facilities can also support wider decarbonisation by providing electric vehicle charging infrastructure or generating biogas for vehicles or injection into the gas grid.
- 5.27 In terms of adaptation, the design and operation of facilities can mitigate risks associated with climate change. This may involve incorporating flood resistance and resilience measures such as raised floor levels, protected utilities, and appropriate site layouts. Processes should be enclosed to reduce odour, dust, and litter, ensuring healthy conditions for staff in extreme weather. Water efficiency measures, including process water recycling and on-site dust suppression, should be adopted, supported by sustainable drainage systems or other water storage solutions to manage runoff. Finally, planning conditions can require the implementation of dust, flood, and emergency management plans to ensure operational resilience under changing climate conditions.

The Proximity Principle and Net Self Sufficiency

- 5.28 The 'proximity principle' is set out in paragraph 4 of Part 1 of Schedule 1 to the *Waste (England and Wales) Regulations 2011*. This is within the context of the requirement for mixed municipal waste collected from private households to be disposed of, or recovered, in one of the nearest appropriate installations, by means of the most appropriate methods and technologies, in order to ensure a high level of protection for the environment and public health.
- 5.29 This is to be achieved by establishing an integrated and adequate network of installations for disposal and recovery of mixed municipal waste collected from private households. The requirement also extends to where the collection includes similar types of waste collected from non-household sources (e.g. waste from offices and retail).
- 5.30 The network is to be designed in such a way as to enable movement towards the aim of self-sufficiency in the disposal and recovery of waste at a national level, while giving consideration to geographical circumstances and/or the need for specialised installations for certain types of waste.
- 5.31 This principle is to be applied when decisions are taken on the location of facilities for the management of mixed municipal waste collected from private households and similar waste (see above) by disposal or recovery. This is recognised in NPPW that expects waste planning authorities to:
'plan for the disposal of waste and the recovery of mixed municipal waste in line with the proximity principle, recognising that new facilities will need to serve catchment areas large enough to secure the economic viability of the plant;'
- 5.32 The NPPW requires local planning authorities, with responsibility as Waste Planning Authority for their area, to include policies in their development plans which set out an overall strategy for the pattern and scale of waste development, ensuring sufficient provision is made for infrastructure for waste management, and energy that may be produced (including heat).
- 5.33 When planning for waste, the NPPW expects WPA areas to assess whether the unmet needs of other areas could be met within their own areas.

Regional Policy – The London Plan

- 5.34 As stated previously, to be found sound the updated WLWP will need to be in general conformity with the London Plan. Hence this section presents a summary of the key requirements of the current adopted London Plan (2021) it is considered the updated Plan needs to address.
- 5.35 The administrative geography of London is overseen at a regional level by the Greater London Authority (GLA). There are thirty-three administrative areas within London: twelve inner boroughs, twenty outer boroughs, and the City of London. There are no inner city boroughs within the WLWP area.
- 5.36 The London Plan provides strategic planning policy for the whole of London and sets out how certain matters, including waste, should be addressed in Local Plans including waste local plans.
- 5.37 The London Plan states that London should manage as much of its waste within its boundaries as practicable, aiming to achieve waste net self-sufficiency by 2026 in all waste streams except for excavation waste. To meet this aim, the London Plan 2021 forecasts arisings of Local Authority Collected Waste (referred to as household waste) plus Commercial and Industrial waste (C&I waste) for London by borough to 2041 (collectively referred to as household, industrial and commercial waste (HIC)). These forecasts are used as a basis to apportion quantities of this waste for management to each borough so that the overall goal of managing the equivalent of 100 per cent of London's waste within London (i.e. net self-sufficiency) by 2026 (Policy SI 8) is achieved. Excavation waste is excluded from the London Plan net self-sufficiency target as it is difficult to recycle and it is more difficult for London to provide sites for management or beneficial use. Hence it has been considered separately in the development of this emerging Plan.
- 5.38 The borough apportionments were derived through an assessment process that included assessment of existing capacity in each borough along with a number of other factors that are considered to determine the ability of a particular borough to provide additional management capacity. The quantities arrived at are referred to as the London Plan apportionments (LP apportionments for short). The types of capacity considered to count towards the management of apportioned waste (hereinafter referred to as 'qualifying capacity') is defined in paragraph 9.8.4 of the London Plan as follows:
- energy recovery in London;
 - production of solid recovered fuel (SRF) and refuse derived fuel (RDF) in London;
 - sorting or bulking for re-use or recycling including anaerobic

digestion. The reuse or recycling may take place within or outside London providing the sorting and bulking capacity is located within London; and

- reuse or recycling including anaerobic digestion within London.

The London Plan forecasts of arisings and apportionments of HIC waste for the West London Boroughs to which this Plan relates are set out in Table 7 below. There are no separate forecasts or apportionments for the area falling under the jurisdiction of the OPDC – although Mayoral Development Corporations such as OPDC must cooperate with host boroughs to meet identified waste needs in line with London Plan policy.

Table 7: London Plan Forecast HIC Waste Arisings & Apportionments for the West London Boroughs (tonnes per annum)

	Waste Arising		Waste Apportionments	
	2021	2041	2021	2041
Brent	259,000	412,000	274,000	437,000
Ealing	291,000	542,000	306,000	576,000
Harrow	188,000	160,000	205,000	170,000
Hillingdon	347,000	423,000	365,000	449,000
Hounslow	260,000	407,000	275,000	432,000
Richmond upon Thames	179,000	148,000	190,000	157,000
Total	1,524,000	2,092,000	1,615,000	2,221,000

5.39 The apportionments for West London are significantly higher than the area’s projected arisings which demonstrates how West London is expected to make a significant contribution to the London Plan's 2026 net self-sufficiency target.

5.40 The London Plan also sets out management targets for waste generated in London in Policy SI 7 Reducing waste and supporting the circular economy. These targets reflect those in the London Environment Strategy (LES) as follows:

- ensure that there is zero biodegradable or recyclable waste to landfill by 2026
- meet or exceed the municipal waste recycling target of 65 per cent by 2030
- meet or exceed the targets for each of the following waste and material streams:
 - construction and demolition – 95 per cent reuse/recycling/recovery
 - excavation – 95 per cent beneficial use (with 100% inert put to use).

- 5.41 In addition, in connection with hazardous waste management capacity, paragraph 9.8.18 of the London Plan identifies ‘...a need to continue to identify hazardous waste capacity for London’ within the context of identifying sites for regionally significant facilities working with neighbouring authorities. These neighbouring authorities could either be within London, or may be located beyond its boundaries. Given national policy does not include an expectation for Plan areas to achieve net self sufficiency for the management of hazardous waste due to its diverse nature and the need for regionally significant facilities to have an extensive catchment to capture a critical mass of waste, it is taken that the London Plan allows for this. This is achieved through Duty to Cooperate engagement with WPAs outside London hosting facilities that receive strategically significant amounts of hazardous waste from west London, identified in the evidence base report²⁷.
- 5.42 The London Plan requires borough Development Plans to “3) allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste...” (Policy SI 8 Criterion B 3)). This is in line with the NPPW which requires waste planning authorities to “identify sites and/or areas for new or enhanced waste management facilities”. The London Plan identifies existing waste sites, Strategic Industrial Locations, Locally Significant Industrial Sites and safeguarded wharves as suitable for new waste facilities. As stated previously, it also requires Mayoral Development Corporations such as the OPDC, to cooperate with host boroughs to meet identified waste needs.
- 5.43 The London Plan seeks to safeguard existing waste sites and retain them in waste use. Paragraph 9.9.1 of the London Plan defines existing waste sites as “...land with planning permission for waste use or a permit from the Environment Agency for a waste use.” The London Plan requires compensatory capacity to be provided in London if an existing waste site is redeveloped for a non waste use. Compensatory capacity must be at or above the same level of the waste hierarchy of that which is lost, and any loss of hazardous waste treatment or disposal capacity must be replaced on a like for like basis. Existing waste sites may be released without re-providing capacity if it can be demonstrated that there is sufficient capacity elsewhere in London to meet the apportionment and in the case of non-apportioned waste the target of achieving net self-sufficiency, where it applies, is not compromised.²⁸

²⁷ ‘Identification of Strategically Significant Cross Boundary Waste Movements from West London’, BPP Consulting, October 2025

²⁸ The target of net self sufficiency for London is not applied to the management of excavation waste or hazardous waste.

- 5.44 The London Plan supporting text indicates that boroughs with surplus capacity should offer to share this with boroughs facing a shortfall before considering release of sites from safeguarding protection. The London Plan also acknowledges that it may not always be possible for boroughs to provide for their apportionment within their boundaries and in these circumstances boroughs should seek to agree the *'transfer of apportioned waste'*.
- 5.45 Furthermore, the London Plan includes policy (Policy SI 8 Waste capacity and net waste self sufficiency) that sets criteria that development proposals for additional waste management capacity are expected to address, plus wider considerations such as job creation and social value, local need and accessibility of services to local communities and businesses.
- 5.46 A review of the London Plan 2021 has commenced. The consultation 'Towards a new London Plan' (May 2025) recognises future changes could require an evolving approach to waste policy in London, recognising the land pressures that continue to threaten the loss of waste management sites, reducing London's capacity to process its own waste. It states the new London Plan will address these challenges by updating borough-level waste apportionments, ensuring they align with the latest data and policy reforms. This draft emerging WLWP has been prepared to be in general conformity with the London Plan 2021. The Plan making bodies will continue to monitor work on the emerging new London Plan as the emerging WLWP develops.

London Environment Strategy (May 2018)

- 5.47 The London Environment Strategy sets out the Mayor of London's vision for improving London's environment. It covers a wide range of issues including air quality, green infrastructure, climate change mitigation and transitioning to a low carbon circular economy alongside waste specific policies and targets.
- 5.48 Policy 7.2.1 sets a target of increasing municipal waste recycling rates to achieve 65 per cent by 2030. To aid in this the Mayor expects waste authorities i.e. Waste Disposal Authorities and Waste Collection Authorities to collectively achieve a 50 per cent LACW recycling target by 2025 and aspire to achieve:
- a 45 per cent household waste recycling rate by 2025.
 - a 50 per cent household waste recycling rate by 2030.

- 5.49 Specific waste related actions include the expectation that waste authorities produce strategies setting out how their waste activities will:
- help move waste up the waste hierarchy to ensure a greater focus on reduction, reuse and recycling
 - provide local economic, social and environmental benefits from improved waste management
 - make a meaningful contribution to meeting the Mayor’s targets
 - make best use of local waste sites and facilities identified in local waste plans
 - support the phase out of fossil fuel waste transport and boost uptake of low or zero emission alternatives.
- 5.50 Policy 7.3.1 is aimed at reducing emissions from transport of waste. It includes an expectation that waste authorities demonstrate how they will transition their waste fleets to low or zero emission options, prioritising the phasing out of diesel. Waste authority waste fleets are expected to comply with the Ultra Low Emission Zone (ULEZ) vehicle exhaust emission standards and to work towards the Mayor’s overall ambition for:
- all new cars and vans (less than 3.5 tonnes) being zero emission capable from 2025
 - all heavy vehicles (greater than 3.5 tonnes) being fossil fuel-free from 2030
 - zero emission fleets by 2050
- Fossil-fuel free can include the use of 100 per cent renewable fuels derived from sources such as food waste and waste oils.
- 5.51 In performing their waste functions, waste authorities are expected to act in general conformity with the municipal waste provisions of the strategy. General conformity in that context only applies to activities involving local authority collected waste (LACW).

London-wide Climate Emergency

- 5.52 In December 2018, the London Assembly declared a climate emergency and called on the Mayor of London to do likewise and put in place specific emergency plans for London to achieve carbon neutrality by 2030. The Mayor declared a climate emergency shortly after the Assembly and set a target for London to be net zero-carbon by 2030. All six West London boroughs have declared a climate emergency and the impact of these on the emerging Plan is considered in detail in the accompanying Climate Change Topic Paper.²⁹

²⁹ *Climate Change Topic Paper* BPP Consulting October 2025

Local Policy

LPA Local Plans and Related Plans and Guidance

5.53 Each West London LPA has adopted its own Local Plan, which forms part of the statutory development plan and sets out the spatial strategy, objectives, and policies to guide development within its area. These Plans include provisions relevant to waste development, particularly in relation to climate resilience, sustainable design, biodiversity, and infrastructure. The following summary identifies policies that will be considered alongside the policies in the emerging WLWP when proposals seeking planning permission for waste related development are being determined.

Brent

5.54 Brent's Local Plan (2019–2041) includes policies that require proposals to demonstrate climate resilience and connect to district heat networks unless using 100% renewable heating. Air quality, flood risk mitigation, and sustainable transport are also key considerations, with specific requirements for SuDS, water management, and safeguarding land for future infrastructure.

Ealing

5.55 Ealing's emerging Local Plan and adopted Core Strategy support the borough's ambition to be carbon neutral by 2030. Development proposals are expected to incorporate energy efficiency measures, renewable energy, and follow circular economy principles. Urban greening standards are set in line with the London Plan, and major development schemes must demonstrate net-zero operational energy and reduced embodied carbon.

Harrow

5.56 Harrow's Proposed Submission Local Plan responds to declared climate and ecological emergencies. All new development must be net-zero carbon and incorporate sustainable design, energy efficiency, and water conservation. Flood risk policies require elevated floor levels and SuDS, while waste and transport policies promote recycling and reuse. Developments must support heat network connections and provide electric vehicle charging infrastructure.

Hillingdon

5.57 Hillingdon's Local Plan encourages high-density development in urban centres and modal shift away from car use. Policies support renewable energy generation, sustainable land remediation, and comprehensive water management. SuDS are required unless demonstrated to be unviable, and biodiversity enhancements such as green roofs and living walls are promoted. Developments within proximity to heat networks must connect unless exempted, and financial contributions may be sought for flood mitigation.

Hounslow

- 5.58 Hounslow's adopted and emerging Local Plans set out requirements for net-zero carbon development, energy efficiency, and integration with district heat networks. Sustainable design features, including SuDS and urban greening, are expected in major schemes. Air quality assessments and mitigation measures are required, and waste management must be addressed in consultation with relevant services.

Richmond upon Thames

- 5.59 Richmond's adopted and emerging Local Plans require developments to reduce carbon emissions. Circular economy principles are embedded, with emphasis on reuse and sustainable construction. Energy strategies must be submitted, and developments are expected to connect to decentralised energy networks. Flood resilience measures, water infrastructure capacity, and urban greening are key considerations for all proposals.

Old Oak and Park Royal Development Corporation (OPDC)

- 5.60 The Old Oak & Park Royal Development Corporation (OPDC) is a Mayoral Development Corporation, which covers parts of three London Boroughs including Brent and Ealing (see Figure 3 above). The OPDC is the local planning authority for its area but does not have responsibility as a waste collection or waste disposal authority for its area. OPDC does not have a separate apportionment in the London Plan. As a Mayoral Development Corporation, OPDC is expected to "...cooperate with host boroughs to meet identified waste needs" (Policy SI8 of the London Plan) and is a joint partner alongside the six other local planning authorities working together to develop the Plan. Only the Brent and Ealing parts of the OPDC area are covered by the WLWP.
- 5.61 The OPDC Local Plan (2018–2038) forms part of the Development Plan for the part of the London Boroughs of Brent, Ealing and Hammersmith and Fulham to which it relates. It supports integrated development aligned with strategic housing and employment targets. Policies require carbon emissions to meet or exceed London Plan standards, with financial contributions where on-site reductions are not achievable. Water management, biodiversity enhancement, and circular economy principles are integral to the design and delivery of development proposals.

West London Waste Authority

- 5.62 The West London Waste Authority (WLWA) otherwise known as West London Waste³⁰, is a statutory joint 'waste disposal authority' (WDA) with responsibility for the management of household and commercial waste collected by or on behalf of the West London Boroughs, serving approximately 1.7 million residents across 38,000 hectares. WLWA also operates a public Reuse and Recycling Centre at Twyford to serve local residents. WLWA is a resource transformation body and has a dedicated Circular Economy team to drive innovation, so materials are kept in use for longer through reuse, repair, remanufacture, and recycling.
- 5.63 In 2002, WLWA entered into a 25-year contract with SITA (now SUEZ) to deliver an Integrated Waste Management Contract for LACW produced in West London. This relies extensively on the export of residual LACW by rail for EfW from two existing waste sites with railheads, Transport Avenue (Hounslow) and Victoria Road (Hillingdon) following processing into RDF. As a result the quantity of west London LACW sent to landfill has reduced to virtually nil.

Local Climate Change Strategies

- 5.64 As stated previously in 2019, all six West London Boroughs declared a climate emergency and committed to achieving net zero emissions by 2030. WLWA has adopted the same target and is working in partnership with the boroughs to support broader sustainability goals beyond waste management.

³⁰ <https://westlondonwaste.gov.uk/>

6 Vision and Objectives

The Vision

6.1 The Vision below describes how waste will be managed in West London looking ahead over the next 15 years.

West London Waste Plan Vision

To contribute to the ambition of being net zero by 2030 across west London, land to be used for waste management over the next 15 years will focus on **the efficient and flexible use of safeguarded sites, railheads and wharves for waste**. This will allow **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.

A **zero-waste to disposal** approach will exist whereby any waste produced in west London is managed applying the waste hierarchy in priority order, with residual waste being minimised, and maximum value recovered from any remaining unavoidable residual waste through high efficiency low-carbon recovery facilities if needed.

The **network of management facilities** across west London will continue to ensure that **at least an equivalent amount** of waste produced within west London is managed within it plus a contribution is made to achieving net self-sufficiency for London as a whole as necessary. There will be sufficient flexibility to manage waste from outside the area where this represents a sustainable option that supports circular economy goals. This, together with sustainable transport options, will minimise adverse impacts on road networks and local air quality.

Through partnerships between local authorities, businesses, and local communities, west London will have established a network of **Circular Economy Hubs**, that foster innovation in waste prevention, material exchange and reuse, and repair. These hubs will help drive green business growth, sustainable entrepreneurship, and job creation, ensuring the transition to a low-carbon circular economy continues strengthening local prosperity, material security and skills development through education and community engagement.

Carbon emissions from west London's waste management system will have been virtually eliminated through:

- electrification of operations using renewable and other clean/ zero carbon energy sources,
- use of sustainable waste transport and low-emission collection services, and
- minimisation of greenhouse gas emissions that may arise from specific types of waste management facilities.

All waste infrastructure will be **resilient to climate change**, meet all relevant **environmental standards** as a minimum and meet evolving operational needs.

Strategic Objectives

6.2 The 'Strategic Objectives' set what needs to be done to realise the vision.

West London Waste Plan Strategic Objectives

Strategic Objective 1: Make best use of Existing Waste Infrastructure to manage waste efficiently

- **Safeguard existing waste sites** across west London to retain sufficient capacity to manage at least the equivalent tonnage of waste arisings in west London plus an amount from elsewhere in London if needed.
- Encourage development of operations at existing waste sites to **improve efficiency, throughput and quality of outputs** through innovation, automation, and **proximity** to material and energy users.
- Encourage appropriate **co-location** of waste uses with other industrial uses to promote **circular economy** solutions as part of a west London wide network
- **Safeguard capacity, capability and future potential** of existing waste management facilities from being compromised by incompatible proximate development such as housing, including by implementing the Agent of Change principle.

Strategic Objective 2: Encourage facilities that contribute to the achievement of a Circular Economy to come forward

- Support local **Circular Economy Hubs** that facilitate material exchange, re-use and remanufacturing. This may comprise a network of local facilities combined with larger-scale infrastructure that may be outside a waste use.
- Provide for waste management capacity that supports production of **high quality material from waste suitable for direct utilisation** by material users.

Strategic Objective 3: Decarbonise Waste Transport and Processing

- Utilise and expand **sustainable transport** options for waste movement, including rail and water freight, to reduce road-miles, by safeguarding railheads and wharves in waste use.
- Require waste management facilities to integrate **low-carbon technologies**.
- Require **waste-to-energy** projects to be integrated with local energy supply from Day 1 of their operation and maximise re-use of any residues produced.

Strategic Objective 4: Deliver High Quality Waste Facilities (Protect and Enhance the Environment and Communities)

- Ensure all waste infrastructure development implements best practice for **protection of the environment and local amenity**.
- **Minimise unacceptable adverse impacts** of waste management operations.
- Require that waste development contributes to local employment and sustainability objectives.

Strategic Objective 5: Ensure sufficient capacity of the right type in the right place so that unavoidable residual waste produced is managed safely and effectively.

- Only consent facilities for the management of **residual waste where it is shown that the waste to be managed is unavoidable**.
- Ensure that such facilities operate to best practice with **minimal adverse impact** to the locality and the environment as a whole including greenhouse gas emissions.

7 Future Requirements for Waste Management Capacity

7.1 In order to establish how much waste management capacity is needed over the Plan period a study³¹ was undertaken that considered amongst other matters how the requirements of the London Plan could be met. The findings of the study are set out below.

Management Capacity for Apportioned HIC³² Waste

7.2 It is estimated that current qualifying waste management capacity in West London is capable of managing c.2.81 million tpa of HIC waste. This is more than sufficient to manage the London Plan apportioned forecast arisings to 2041. Table 8 below shows that the surplus capacity for the management of apportioned waste at 2041 is estimated to be c0.58.Mtpa.

Table 8: Combined apportionment for West London Boroughs compared to Estimated Apportionment Capacity in West London (after release of sites)

	Baseline	2041 Forecast
Apportionment (London Plan 2021)	2,092,000	2,221,000
Assessed Capacity (2025)	2,807,586	2,805,432
Difference	+715,589	+584,432

Management Capacity for C, D & E Waste

7.3 An estimate of 3.3 Mtpa was derived for C, D & E waste arising in 2023 rising to 3.5Mtpa in 2041. Comparing this to an estimate of existing C, D & E waste management capacity to be safeguarded of c3.9Mtpa reveals a capacity surplus estimated to be approximately 0.37Mtpa in 2041 (after site release deductions). However given C& D waste is dealt with separately to Excavation Waste in the London Plan, each has been considered separately.

7.4 When C&D waste is considered alone, the arisings value is 1.13Mt in 2023 rising to 1.26Mt in 2041. This compares with assessed capacity of 2.5Mtpa in 2023 reducing to 2.47Mtpa in 2041, giving a capacity surplus of 1.35Mtpa in 2023 and 1.2Mtpa in 2041 respectively. As excavation waste is not subject to the expectation of net self-sufficiency, capacity has not been assessed.

³¹ West London Waste Plan, *Assessment of Existing Waste Management Capacity*, BPP Consulting, October 2025

³² Household Waste plus Commercial and Industrial waste

Management Capacity for Hazardous Waste

- 7.5 A forecast for hazardous waste arisings to 2041 indicates that 50,900 tpa will be produced in 2041. This compares to existing hazardous waste management capacity of 116,000tpa which indicates there is a capacity surplus of approximately 64,400tpa in 2041.

Requirements for landfill

- 7.6 Non-hazardous residual waste will continue to be diverted from landfill due to the landfill tax escalator and other initiatives, slowing the depletion of available void space in existing sites. This helps to preserve remaining landfill capacity. In the absence of any non-hazardous landfill capacity within the Plan area, the anticipated demand for non-inert landfill capacity from West London could be met by landfills outside the Plan area.
- 7.7 Monitoring of landfill availability, and ongoing liaison with relevant WPAs will help ensure sufficient capacity is planned for while the Plan's focus remains on reducing the area's non-hazardous landfill requirement to an absolute minimum in line with the national residual waste reduction target. Policy WLWP5 does however provide for the possible development of such capacity within West London where exceptional circumstances prevail.

Providing for Unmet Needs from Elsewhere within London

- 7.8 The London Plan³³ expects Boroughs to offer to share any surplus capacity with other London boroughs that may be facing a shortfall before considering release of existing sites from waste use. In light of the identified surplus in C, & D waste and apportioned HIC waste management capacity, the LPAs intend to invite other London boroughs to consider whether the surplus in West London might offer an opportunity for their unmet needs to be met. It should be noted that the most recent dataset for 2023 shows significant tonnages of waste that arise from outside the WLWP area are managed at facilities located within the WLWP area (hence the existence of the identified capacity surplus).³⁴
- 7.9 Any agreements on sharing capacity will be formalised in a Statement of Common Ground (or similar) to which all the LPAs party to the WLWP, and the Plan making entity seeking to share in West London capacity will be

³³ Paragraph 9.8.6, London Plan 2021

³⁴ See '*Identification of Strategically Significant Cross Boundary Waste Movements from West London*', BPP Consulting, October 2025

signatories. Such agreements would cover a specified period (which may be less than the period of this Plan) and be subject to review and renegotiation, including as part of future reviews of the WLWP in light of adoption of the new London Plan. Any such agreements will be reported in the West London LPAs' Authority Monitoring Reports (AMR).

8 Future Waste Management Capacity in West London

- 8.1 Given there is sufficient capacity in West London to meet the management requirements for all three principal waste streams throughout the Plan period, this Plan:
- does not propose to allocate specific areas of land for the development of additional waste management facilities, and therefore the existing sites allocated in the adopted WLWP for intensification are released; and
 - safeguards existing waste management sites where such safeguarding protection does not hinder the wider development aims of the host LPAs as set out in adopted Local Plans.
- 8.2 The list of sites proposed to be safeguarded through the emerging updated WLWP is included in Appendix 2, with maps included in Appendix 3. The safeguarding policy is Policy WLWP1. WLWP1 also sets out the circumstances when proposals for additional waste management capacity might be acceptable.
- 8.3 Existing waste sites that fall within areas identified for redevelopment in LPA Local Plans for non-waste uses are listed in Table 9 below. The loss of the capacity offered by these sites is considered in a separate report³⁵. When the prospective loss of capacity offered by these sites is factored into the assessment of existing waste management capacity, outlined above, surpluses for the management of HIC waste and C&D waste still remain.

Table 9: Existing Waste Sites Proposed for Release from Safeguarding

LPA	Site	Consented Use	Assessed Peak Waste Capacity (tpa)		
			HIC	CDEW	Haz
Hounslow	Unit 8 Initial Washrooms (Brentford) Service Centre,	Waste transfer	2,156	0	1,094
OPDC	Atlas Wharf, Atlas Road		0	65,382	0
OPDC	Quattro, Victoria Road	Waste transfer	0	0	0
Brent	Mitre Works, Neasden Lane (European Metal Recycling Ltd)	Metal recycling	16,490	0	0
	Land at Neasden Goods Yard (X-Bert Haulage)	Waste transfer	0	60,254	0
	Unit 6 Neasden Goods Yard (X-Bert Haulage)	Waste transfer	0	83,722	0
Totals			18,646	209,359	1,094

³⁵ *Safeguarded Sites for Release in West London – Assessment Report*, BPP Consulting, October 2025

- 8.4 Available capacity will be monitored over the Plan period, taking account of any agreements reached with other boroughs and will be reported periodically.

9 Proposed Policies

- 9.1 The following section sets out the policies the west London LPAs intend to include in the updated WLWP for use when the LPAs are determining applications for planning consent for waste related development in West London. The relevant policies set out below will be applied alongside any relevant policies in other documents that form part of the development plan.

- 9.2 The proposed policies are summarised below:

Policy WLWP 1 –Safeguarding and Optimising the Waste Site Network.

Keystone policy to make the most of existing network of suitable sites.

Policy WLWP 2 – Provision of Additional Waste Management Capacity.

Policy making provision for compensatory and windfall capacity.

Policy WLWP 3 – Residual Waste Management and Energy Recovery.

Policy defining specific conditions under which capacity for the management of residual waste may be supported.

Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities.

Policy setting out waste specific requirements/standards that facilities need to meet.

Policy WLWP 5 – Recovery and Disposal of Waste to Land.

Policy defining specific conditions under which proposals for:

- non-inert landfill;
- placement of inert waste; and
- excavation/mining of existing landfills may be consented.

Policy WLWP 6 - Circular Economy & Resource Efficiency.

Policy setting out the requirements for proposed waste related development to support the Circular Economy and ensure the land, facilities and infrastructure necessary to deliver waste related Circular Economy & Resource Efficiency proposals that come forward.

9.3 Each of the proposed policies are set out in detail in the following section.

Policy WLWP 1 – Safeguarding and Optimising the Waste Site Network

Policy Purpose: *Protecting, enhancing and optimising the network of waste sites so that sufficient waste management capacity is provided for the plan period as follows:*

- 1. the apportionments for Household and Commercial & Industrial (HIC) waste for 2041 set out in the London Plan 2021 will continue to be met (noting that the London Plan is currently undergoing review); and*
- 2. the equivalent amount of C, D & E waste forecast to arise in West London will continue to be managed within the Plan area (with the exception of excavation waste); and*
- 3. for hazardous waste, capacity that would meet a need for west London or London as a whole if the need for the capacity to be located within west London is demonstrated;*

whilst allowing for the reprovion of capacity at suitable locations within west London.

- 9.4 The London Plan 2021 Policy SI 9 sets out that existing waste sites should be safeguarded and retained in waste management use. The purpose of safeguarding existing waste management sites is to ensure sufficient capacity is maintained in west London so that the objectives and targets for waste management set out in the Plan are met throughout the Plan period.
- 9.5 The London Plan 2021 allows for the redevelopment of existing waste sites for non-waste uses providing an equivalent amount of replacement (aka compensatory) capacity is provided. There is also a provision in the London Plan that allows for release without replacement capacity being provided where it is demonstrated there is already sufficient capacity to allow the London Plan apportionments to be met elsewhere in London and the capacity that would be lost is not required to ensure net self-sufficiency is met. This is based on capacity increases at waste sites being implemented over the Plan period³⁶, which in turn is based on the assumption that the current capacity provided by existing waste sites across London is insufficient to meet the London Plan objectives and targets. Where compensatory capacity is required, the London Plan 2021 states that the quantum should be based on the peak recorded input to the site in question over the most recent five years for which data is available. If such data is unavailable, an appropriate assessment of potential capacity may need to be made. The Environment

³⁶ London Plan 2021 paragraph 9.9.3

Agency's Waste Data Interrogator dataset is recommended for the identification of peak input to sites that have been operational during the five year period to which data relates.

- 9.6 This Waste Plan proposes to safeguard waste management capacity based on the assessed capacity of existing waste sites, rather than solely on the five year peak recorded input. This is in order to avoid an incremental loss of waste management capacity over the Plan period within the context of strong development pressure from competing land uses across West London.
- 9.7 The London Plan 2021 currently defines existing waste sites as:
- sites that benefit from permanent planning permission that expressly consents the management of waste, and/or
 - sites subject to an Environmental Permit that permits a waste management activity.

The London Plan definition does not include sites with a waste use that has become lawful through the passage of time under planning legislation or where the waste use is ancillary to a wider lawful use. The lawful status of such sites can be confirmed by issue of a Certificate of Lawful Existing Use or Development (CLEUD). For the purposes of the WLWP, existing waste sites are defined as land that:

- is subject to an extant planning consent for waste use; or
 - for which a Certificate of Lawful Existing Use or Development (CLEUD) for waste use has been granted; or
 - is used for a waste use that has become lawful through the passage of time under planning legislation; or
 - where the waste use is ancillary to a wider lawful use.
- 9.8 Such sites may also benefit from an Environmental Permit issued by the Environment Agency for waste-related operations, but such a permit's existence is not considered determinative on the matter of safeguarding as that is properly a land-use planning rather than pollution control matter. Therefore sites that are only subject to an Environmental Permit for waste use, and do not have a planning permission, a CLEUD, or are not otherwise considered lawful under planning legislation, are not included within this definition. An assessment of the capacity for each safeguarded site in West London was undertaken and included in the Waste Capacity Assessment³⁷.
- 9.9 Proposals to develop a safeguarded waste site for waste management uses

³⁷ See West London Waste Capacity Assessment, 2025, BPP Consulting

will be supported where this contributes to the optimisation of waste management capacity of the Plan area.

- 9.10 Proposals to redevelop a safeguarded waste site for a non-waste use will need to demonstrate that other existing waste sites already provide sufficient capacity to meet both the apportionments set by the London Plan for the Plan area and the net self-sufficiency target for London as a whole over the Plan period, or that appropriate replacement capacity is secured before the change in use sought may be consented.
- 9.11 Where replacement capacity must be provided, this may either be through enhancing the capability of an existing safeguarded waste site or through securing a new site capable of managing at least the required amount of waste. As per Policy SI 9 of the 2021 London Plan this should in the first instance be located within the Plan area, but failing that, elsewhere within London. In either case, provision of the additional capacity must be capable of being secured through a legal agreement.
- 9.12 Replacement capacity must be at least equivalent in terms of:
- the type of waste managed (HIC (LACW & C&I), C, D & E, Hazardous); and
 - its position on the waste hierarchy (a lower throughput for management further up the hierarchy may be acceptable).
- 9.13 If the current capacity qualifies as capacity for managing apportioned waste as set out in Para 9.8.4 of the London Plan (reproduced above), any replacement must also satisfy the London Plan's criteria for qualifying capacity.
- 9.14 There must also be no existing or proposed developments that could constrain provision of the replacement capacity, such that it might not be deliverable in practice.
- 9.15 LPAs will enforce provision of replacement capacity through conditions on the planning consent granted to the site to be released and legal agreements to ensure that replacement capacity must be capable of entering into operation, in accordance of part H.
- 9.16 Railheads and wharf capacity for waste transportation associated with a safeguarded waste site are also safeguarded for waste use, where such use does not conflict with other existing or planned uses. However, in the event that the waste site ceases to be safeguarded for waste use, the safeguarding of the associated railhead or wharf will also cease.

Policy WLWP 1: Safeguarding Existing Waste Sites

- A. Waste management sites in west London will be safeguarded for their identified waste use unless otherwise identified for release.
- B. Waste management sites are those subject to planning consent or CLEUDs for a waste use, or deemed lawful in planning terms (those listed in Appendix 2 and meeting the definition post-adoption of this Plan).
- C. Sites subject to time limited consents will only be safeguarded as far as the date at which the consent permitting the waste use expires.

Development of safeguarded waste sites for waste management uses

- D. Proposals to develop safeguarded waste sites for waste management uses will be supported where this contributes to the optimisation of waste management capacity of the Plan area. The waste management capacity of the redeveloped site must not be less than the assessed potential waste management capacity of the existing site, as set out in Appendix 2 (or in any subsequent assessment), unless it will demonstrably result in waste being managed further up the waste hierarchy and the site is being optimised for this purpose
- E. Opportunities should be explored to co-locate waste management facilities together and with complementary activities, provided cumulative effects remain acceptable.

Release of safeguarded waste sites for non-waste uses

- F. At the time of an application for re-development of a safeguarded waste site for non-waste uses, the replacement capacity requirement will be determined, with the assessed potential waste management capacity of the existing site as set out in Appendix 2 (or in any subsequent assessment) being the starting point.

In certain instances, the following will also be relevant considerations with a degree of weight:

- the site's particular circumstances (including allocation within a Local Plan for an alternative use),
- throughput capacity consented through a previous planning consent,
- reported throughput (based on the Waste Data Interrogator or an equivalent data source), and
- wider market conditions.

The replacement capacity must be at or above the same level of the waste hierarchy as the capacity it would replace.

Policy WLWP 1: Safeguarding Existing Waste Sites (continued)

G. If the capacity of the existing safeguarded waste site is shown to be surplus to requirement for London as a whole over the Plan period (and it can be demonstrated, where relevant, that this takes account of current and upcoming London Plan apportionment targets and net self-sufficiency targets), such sites could be released for other land uses. This approach should be applied by facility and waste type ⁴².

H. Provision of replacement waste management capacity must be capable of entering operation prior to commencement of the development which would result in the loss of capacity. This will be secured through condition and/or legal agreement if consent for the change of use for non-waste uses is granted.

Railheads and Wharves

I. Railheads and wharf capacity for waste transportation associated with a safeguarded waste site will be safeguarded for waste use where it does not conflict with other existing or planned uses. In the event that the existing waste site ceases to be safeguarded for waste use, the safeguarding of the associated railhead or wharf will also cease.

Neighbouring developments

J. To protect the ongoing operation of safeguarded waste sites, the Agent of Change principle will be applied to ensure that any sensitive receptors or potentially incompatible developments in proximity to safeguarded waste sites will not constrain the waste site's current and future operation or capacity, including through incorporating appropriate mitigation as part of the design.

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Implementation

- 9.17 Safeguarded sites are those waste sites whose capacity has been counted as contributing towards meeting the above need as listed in Appendix 2, unless they have been released from safeguarding. Following adoption of this Plan, updates on the list of waste management sites that meet the definition will be provided in Authority Monitoring Reports produced by the LPAs.
- 9.18 The planning authority may seek financial reimbursement from the applicant to cover the cost of independent expert scrutiny where capacity matters require further verification.

³⁸ See para 9.8.20 and Policy D13 of the London Plan (2021)

Policy WLWP 2 – Provision of Additional Waste Management Capacity

Policy Purpose: To enable the Plan area waste network to evolve in response to emerging needs for capacity, including moving waste up the hierarchy, supporting development of the circular economy, and provision of compensatory capacity.

Need for additional capacity and waste hierarchy

- 9.19 Waste management capacity' is taken to be the maximum amount of waste that can be managed at a site or facility (generally measured in tonnes per annum throughput, or, for permanent deposit to land e.g. landfill, may be overall volume in cubic metres) on an annual basis.
- 9.20 The most recent waste management capacity assessment³⁹ demonstrates that there is a surplus of capacity in West London. This is needed for the management of current and forecasted future waste arisings within the Plan area, plus that to meet the London Plan apportionments. Therefore, there is no identified need for development of additional capacity within the Plan area. The capacity of sites to be safeguarded for waste use⁴⁰ exceeds that assessed to be needed over the Plan period. This provides a degree of flexibility should waste management requirements change or London Plan apportionments increase through the new London Plan.
- 9.21 However, there may be scope for development of additional capacity, including through intensification of existing sites, to provide for management further up the waste hierarchy.

Location

- 9.22 While existing capacity in west London has been assessed to be sufficient to meet identified management needs over the Plan period, development of additional capacity, for example to move the management of waste up the waste hierarchy or to provide compensatory capacity to allow release of select existing waste sites is still encouraged. The London Plan (Policy SI8 B4) identifies suitable locations for the provision of additional waste management capacity as existing waste sites, Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs), and safeguarded wharves with existing or potential for waste management. The emerging WLWP reflects the same approach as the London Plan Policy SI8 B4 and supports development

³⁹ See *West London Waste Capacity Assessment, 2025*, BPP Consulting

⁴⁰ See Appendices 2 and 3.

of waste management sites providing it is located either on existing waste sites, or on industrial land identified as suitable in LPA Local plans, where the grant of consent would be consistent with other policies of the development plan including those protecting the environment, health and amenity.

- 9.23 Possible impacts on the local highway network and air quality that may be caused by increased vehicle movements are often key areas of concern for local communities. Preferred locations are therefore those close to railheads and wharves and/ or close to the strategic road network (motorways and trunk and principal roads). It is also important that the full potential of locations which allow for non-road modes of transport i.e. by rail and water, are utilised so that unnecessary movements of waste by road is eliminated.

Policy WLWP 2: Provision of Additional Waste Management Capacity

Emerging Capacity Needs

- A. Proposals for additional waste management capacity will be supported in principle where they:
 - a. Demonstrate they would contribute towards meeting a specific need for the management of waste arising within West London; or,
 - b. Are for capacity which would result in target waste being managed as far up the waste hierarchy as possible; or
 - c. involve re-use, repair, and remanufacturing activities, including Circular Economy Hubs, assessed to constitute waste development.
- B. Development of capacity to manage non-apportioned waste streams will be supported to sustain Plan area net self-sufficiency as follows:

Construction, Demolition & Excavation (C, D & E) Waste

- C. Proposals for capacity that will facilitate the use of C, D & E waste, and its conversion into products suitable for use (reflecting circular economy principles) will be supported in principle.
- D. On major development sites, the establishment of temporary material exchanges and C, D & E waste processing facilities during construction should be considered where this is demonstrated to not have significant adverse effects on the environment, local amenity and does not hinder timely completion of construction.

Hazardous Waste

- E. Proposals for additional hazardous waste management capacity will be supported where they meet an identified need either within west London or within London as a whole, and would contribute towards a network of facilities that promote the safe and sustainable treatment of hazardous waste across London.

Policy WLWP 2: Provision of additional Waste Management Capacity (con)

Locational Criteria

F. Proposals for waste capacity will be supported in principle where the following criteria are met:

It is demonstrated that:

- i. It is within a safeguarded waste site; or
- ii. It is located within industrial areas or previously developed land (PDL) with priority given to Strategic Industrial Locations (SIL) or Locally Significant Industrial Sites (LSIS) provided they do not compromise these designations and allocations in development plans for non-waste development; or
- iii. The site is otherwise suitable for the proposed use and is consistent with the relevant development plan and its spatial strategy; and
- iv. Existing transport links are adequate to serve the development, or where necessary can be improved to an appropriate standard; and
- v. Where practicable and economically viable, the development makes use of sustainable modes of transport (rail or water) for the transportation of materials to and from the site both during construction and operation; and
- vi. The proposal would not result in significant adverse impacts on the environment or local amenity, or unacceptable impacts on highway safety, including cumulative effects in combination with other existing or proposed development in the vicinity.

9.24 For facilities managing Household Commercial & Industrial (HIC) waste, either the combined current capacity of the safeguarded sites (based on planning consent) should be taken into account to demonstrate an identified need to meet London Plan apportionment/management targets or specific needs (such as a particular technology), hence justifying the proposed additional capacity. For other waste streams, it should be shown that the proposed additional capacity will meet an identified need or enhance the range of waste management facilities available to serve the Plan area (e.g. a specialist facility to recycle a waste/material not currently separately managed in the area).

- 9.25 Proposals will be assessed as waste-related development if the primary use involves processing of waste, unless there is a clear case for them not to be dealt with as such; certain uses such as small-scale reuse facilities may be assessed as non-waste uses depending on the precise nature of their activity.
- 9.26 Temporary material exchanges, for example for materials such as timber pallets and architectural salvage, and deployment of mobile plant for crushing and screening, which serve major development sites during the construction and demolition phase, will be supported in principle.
- 9.27 The Plan recognises that industrial land is generally appropriate for waste uses, paying regard to any emerging pressures or planned development that might limit land supply.
- 9.28 The assessment of impacts shall include (but is not limited to) traffic, air quality, noise, vibration, odour, litter, visual impact, and community safety/well-being as set out in Policy WLWP4.

Policy WLWP 3 – Residual Waste Management & Energy Recovery

Policy Purpose: To allow for provision of additional residual waste management capacity where a need in west London is demonstrated that won't compromise the achievement of the objective of managing waste as high up the waste hierarchy as possible and the reduction in residual waste arisings.

Where provision involves energy from waste capacity, to ensure that this is for residual waste only, that the use of energy produced is maximised and carbon emissions are minimised.

- 9.29 Residual waste is normally defined as waste that is left after reuse, repair and recycling has been maximised. However, it is now defined in national legislation⁴¹ as all waste subject to final treatment, whether sent to landfill, incinerated or treated through energy recovery (including Refuse Derived Fuel exported for energy recovery).

- 9.30 The term also captures within it, that amount of household waste that is managed through these routes, as well as waste arising from other sources of a similar nature as municipal waste plus certain wastes from other sources such as C, D & E waste. Figure 7 below illustrates how the total residual waste is made up.



Figure 7: Residual Waste

⁴¹ The Environmental Targets (Residual Waste) (England) Regulations 2023

- 9.31 Given the above, the reduction of residual waste is a key objective of the new West London Waste Plan. This policy is included to reflect this, restricting the provision of additional capacity to manage residual waste only to that which is proven to be unavoidable. i.e., the fraction remaining after all reasonable measures to reduce, reuse, or recycle have been applied. In such cases the capacity should be appropriately sized so as to ensure that the long term national per head target of halving residual waste by 2042 is not compromised.
- 9.32 The management of the combustible proportion of residual waste that arises from municipal sources in particular often involves technology that converts it to energy. Energy from Waste (EfW) generally takes the form of plants that incinerate waste and capture the heat to generate electricity. 'Surplus' heat may also be captured and utilised in heating, or cooling, of other development sometimes via the use of district heating schemes. Other forms of energy from waste such a pyrolysis and gasification are sometimes classed as 'Advanced Thermal Treatment'.
- 9.33 In terms of the waste hierarchy, EfW is classed as 'Other Recovery' and so, as a means of managing waste is generally less preferred than recycling but more preferred than disposal. To qualify as 'recovery', energy from waste plants must achieve a minimum level of energy efficiency as defined by 'R1' status⁴². Without R1 status such plants are technically classed as disposal. However as noted above for the purpose of monitoring progress towards the halving residual waste production per head target for 2042, waste managed through EfW is counted alongside waste disposed to landfill and waste converted to RDF.
- 9.34 At present there are no plants in West London which incinerate waste, however some facilities manufacture refuse derived fuel from residual waste arising in West London for incineration elsewhere. While the assessment of future waste management capacity requirements indicates that there is no identified need for EfW capacity to be developed in West London, and the LPAs are currently unaware of any specific proposals for such capacity, given this form of waste management has certain characteristics which need particular consideration, Policy WLWP 3 is included to address these matters in the event that an application seeking planning consent for such a facility were to be received.

⁴² The 'R1' value relates to the energy efficiency factor of an incinerator which determines the extent to which an incinerator uses waste as a fuel to generate energy. The minimum R1 value is 0.65 for municipal waste incinerators permitted and in operation after 31 December 2008. For further information see <https://www.gov.uk/guidance/waste-incinerator-plant-apply-for-ri-status>

- 9.35 Unless captured, the burning of waste leads to the release of carbon dioxide, therefore, the more energy that can be recovered, the less carbon dioxide is emitted per energy unit. Policy SI 10 (E) 3) of the London Plan 2021 expects EfW facilities to meet a minimum performance of 400g of CO₂ equivalent per kilowatt hour of electricity produced (this is known as the ‘Carbon Intensity Floor’). To maximise their efficiency, EfW facilities should be designed and located so that surplus heat can be fully exploited. This could be through district heating or by nearby industry that can utilise the process heat either for heating or cooling. This kind of EfW is known as Combined Heat and Power (CHP). The LPA Local Plans include policies related to developments that deliver heat and cooling to buildings near a CHP facility.
- 9.36 The combustion of the biogenic elements of residual waste can generate low-carbon renewable energy, whereas burning non-biogenic waste, which includes materials like oil-based plastics, does not. The split of biogenic and non-biogenic materials in residual waste is currently thought to be roughly equal, but this is likely to shift during the Plan period as measures like separate food waste collection from households and businesses are put into place. However, non-biogenic waste generally has high calorific value and so may be required to ensure EfW plants are viable.
- 9.37 The Sixth Carbon Budget of the Government’s Climate Change Committee suggests that all EfW facilities should implement carbon capture and storage by 2040 to meet the national goal of net-zero carbon emissions by 2050. Considering that EfW plants have a minimum lifespan of 30 years, any EfW development proposal must account for this, as retrofitting Carbon Capture, Utilization, and Storage (CCUS) may not be feasible once the plant is operational. The Committee’s budget also indicates that the required carbon reduction in waste management is anticipated to result from increased recycling, which should not be undermined by the creation of extra EfW capacity.
- 9.38 EfW results in the production of solid ash residues. In the case of mass burn incineration, two types of ash are produced: ‘incinerator bottom ash’ (IBA) which is heavy ash that falls through the grate and ‘air pollution control residues’(APCr) which are reaction residues from emission control systems. Bottom ash can be recycled into an aggregate with some metal extraction and technologies can utilise APCr in the manufacture of construction materials.
- 9.39 EfW is likely to remain an essential part of waste management infrastructure especially if the management of unavoidable residual waste including such materials as persistent organic pollutants and other chemicals that are no longer acceptable for disposal to landfill increases in future.

Policy WLWP 3: Residual Waste Management & Energy Recovery

- A. Proposals for the final management of residual waste by either 'other recovery' or disposal will only be supported if it is demonstrated:
 - a. that the waste to be managed constitutes unavoidable residual waste that cannot practicably be managed higher up the waste hierarchy, and
 - b. the proposals are in accordance with the proximity principle; and
 - c. a need for the capacity to serve west London will exist for the lifetime of the proposed facility.

No Conflict with Recycling

- B. Proposals for management capacity for residual waste must not undermine recycling or lock-in the supply of residual waste for the lifetime of a plant.
- C. Proposals must demonstrate that:
 - a. incoming waste will be managed in accordance with waste hierarchy in priority order, and
 - b. a local need for capacity will exist for the life time of the proposed facility.

Energy Recovery

- D. Proposals for waste management facilities capable of producing energy or a fuel must secure:
 - a. The local use of any heat through either connection to an existing heat network or through the provision to connect to a network in the future, including providing sufficient land to accommodate structures to facilitate the future implementation of local supply; or
 - b. The use of fuel either directly through piped supply or indirectly through pressurisation and transport; or if relevant
 - c. The use of any RDF produced in energy efficient facilities as a direct replacement for fossil fuels; or any other contribution to decentralised energy provision in London.
- E. Energy from Waste facilities must demonstrate:
 - a. they qualify as a recovery operation as defined in the Waste Framework Directive and include measures to ensure energy recovery efficiency performance standards are maintained throughout their operational life as a minimum; and
 - b. the release of non-biogenic gaseous carbon emissions will be minimised, with mechanisms to capture for use and/or storage if use (and prevention) is not viably incorporated into facility design; and

Policy WLWP 3: Residual Waste Management & Energy Recovery (continued)

- c. residues requiring offsite management will be managed prioritising further recovery and otherwise demonstrate safe disposal as a last resort.

9.40 Applicants for final fate capacity to manage residual waste will be required to submit a Waste Hierarchy Statement setting out how incoming waste will be managed in accordance with application of the waste hierarchy in priority order plus that a local need for capacity will exist for the lifetime of the proposed facility.

9.41 Any EfW development will be subject to a condition that it shall cease to operate (or be upgraded within an agreed timeframe) if it falls below the minimum energy recovery efficiency performance standard.

Policy WLWP 4 – Ensuring High Quality and Resilient Waste Facilities

Policy Purpose: All proposed waste management facilities in west London are designed and operated to the highest standards of environmental protection and contributes positively to the local area. The proximity principle is complied with where it is applicable, and the movement of processing residues is accounted for if/where they arise.

- 9.42 Where waste capacity is developed, it should be of high quality and contribute to the achievement of other national and development plan policies and objectives including reducing greenhouse emissions, efficient resource use, protection and enhancement of the environment (including the water environment) and protection of amenity and health. Such requirements are set out in the London Plan Policy SI8 and Local Plan policies. This applies not only to their operational impacts but also to the ‘whole life-cycle’ carbon emissions associated with construction.
- 9.43 Policy WLWP 4 provides a range of criteria to ensure developers consider and mitigate the impacts of their development on the environment, the community and the appearance of local area. The criteria detailed in the Policy has been tailored to specific waste requirements, but it should not be read as an exhaustive list. Other policy areas may be relevant to specific developments and applicants are advised to refer to other relevant policies set out in the London Plan, Borough or OPDC Local Plans, Development Management Policy documents, Site Allocations and Area Action Plans as appropriate.
- 9.44 Development design is crucial in managing and reducing adverse impacts on the environment, amenity, and sensitive receptors. Noise, litter and all other emissions (including those to air and water) must be adequately controlled so as not to cause any adverse impact on the surrounding area. Developers are expected to submit details of proposed control measures with any planning application. Where proposals involve operations which could result in fugitive emissions (e.g. noise, dust, litter etc.) there is an expectation that such operations will be properly contained and normally this will be achieved by enclosing operations within a covered building with vertical sides and defined access and egress points. Enclosure of operations within a building is particularly important given the majority of the Plan area is designated as an Air Quality Management Area. In exceptional cases, if it is shown that enclosure is not a practicable option, other mitigation such as acoustic screening and operational management measures will be required. Re-configuration and intensification of existing waste management sites may present opportunities to improve the design and performance of a facility.

- 9.45 The design and layout of the development must ensure that proposed uses can successfully co-exist with surrounding uses, having regard to the amenity of adjacent occupiers and the operational requirements of existing and future businesses, ensuring that the potential conflicts will be adequately mitigated in accordance with the London Plan 2021 Policy D13 Agent of Change and any revised versions of the London Plan.
- 9.46 The development is expected to be designed to be resilient to climate change impacts including in terms of its location, setting and orientation and managing flood risk and extreme weather events.
- 9.47 The road network within West London is often congested and therefore proposals must demonstrate active consideration of transport modes other than by road. Where development relies on road based transport, there must not be any significant or unacceptable adverse impacts on the local road network or other road users. Careful routing of HGVs should be used and access must be shown to be safe and appropriate to the scale and nature of movements associated with normal level of operations. Proposals should demonstrate that adequate parking for all vehicles is available on site.
- 9.48 Other considerations to the local environment (such as flood risk, and transport), amenity and sensitive receptors (such as health and wellbeing) will need to be addressed, but as detailed earlier in the plan, the development plan should be read as a whole and therefore have not been duplicated in this policy. 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 maximized to improve visual amenity and provide ecological benefit. In addition, proposed developments will be required to conserve and avoid harm to, or loss of significance of any heritage assets such as conservation areas, archaeological sites, listed buildings (etc.) unless justification is provided.
- 9.49 Environmental permitting provides the appropriate mechanism for control of operational impacts and should be assumed to operate efficiently though it is strongly recommended that applicants consider these matters in tandem with the planning application and seek early advice from the Environment Agency. The need to enclose operations may be prescribed by Environmental Permitting and such requirements will normally require planning consent.

Policy WLWP 4: Ensuring High Quality and Resilient Waste Facilities

- A. All proposed waste management facilities in west London must be designed, built and operated to achieve the highest practicable environmental standards, recognising that environmental standards will evolve over the lifetime of the Plan.⁴³
- B. Proposals for development must demonstrate that:
1. The development is of a scale, form and character appropriate to its location; and
 2. the proximity principle has been complied with (where applicable); and
 3. it will deliver a lasting and positive contribution to the local environment, economy and community throughout its operational life and post-closure (if applicable) and incorporates measures to;
 - avoid unacceptable adverse impacts arising from noise, dust, litter, vermin, vibration, odour, bioaerosols, external lighting, visual intrusion, traffic or associated risks to the environment and health and wellbeing of local communities;
 - adapt and be resilient to the impacts of climate change; and
 - minimise greenhouse gas emissions from all aspects of its operation, and
 - control, reduce and mitigate impacts from vehicles including the use of low emission vehicles, installation of vehicle charging points and scheduling and management of vehicle routing.
 - any process residues requiring offsite management will be subject to further recovery wherever practicable, or otherwise demonstrate how these will be disposed safely.

⁴³ Noting that where subject to an environmental permit, operational standards may be defined by the pollution control body from time to time; and standards for the performance of all built development set in Local Plans and the London Plan apply.

Policy WLWP 5 – Deposit of Waste on Land

Policy Purpose: To ensure that the landfill of non-inert waste is minimised (in accordance with the waste hierarchy) and that potential impacts of landfill, including any reworking and restoration and aftercare are properly managed. Provision for the deposit of inert waste on land for beneficial purposes where needed.

Non-inert Waste Landfill

- 9.50 The disposal of waste is at the bottom of the waste hierarchy as the least preferred form of waste management, and non-inert waste should be sent to landfill only if it cannot be managed by methods higher up the Waste Hierarchy i.e. it is an option of last resort. In exceptional circumstances it may be demonstrated that there are certain types of waste (e.g. some hazardous waste) which cannot practically be managed by any other means and so landfill⁴⁴ is the only option. Such wastes are generated in comparatively limited amounts and are generally handled at specific landfill sites designated for hazardous waste or within specially constructed cells at non-inert landfill sites.
- 9.51 Non-inert landfill has been undertaken in west London in the past, however there are currently no voids which would be suitable for non-inert waste landfilling. Therefore, any provision of such capacity would involve the creation of new void space either by extracting material for other purposes like engineering, or by altering the land's natural contours, or a combination of these two methods. In either case the underlying geology would need to be suitable to prevent escape of pollution to underlying groundwater resources.
- 9.52 Landfilled non-inert waste often gives rise to the production of landfill gas (including methane) and leachate, both of which need proper containment and management to ensure they do not cause pollution of the environment or harm to human health. In light of this, the provision of new capacity is largely reliant on the presence of certain geological and hydrogeological conditions needed to minimise the risk of groundwater pollution. While being a potential pollutant, landfill gas can be captured and put to use as a fuel to produce energy.
- 9.53 The restoration of landfill sites offers opportunities to enhance the environment for example by providing wildlife habitats and/or recreational

⁴⁴ The term 'landfill' should also be taken to include landraising.

opportunities e.g. country parks.

- 9.54 In addition to generating more void space, the reworking (or ‘mining’) of current or historical and restored landfill sites could potentially free up land for development and/or create opportunity for the extraction of recyclable/recoverable materials previously discarded. Older landfills might also require reworking to remove waste causing pollution and/or to prevent the uncontrolled release of pollutants. However, there are significant risks associated with the reworking of landfill sites as hazardous materials may have been disposed of without being recorded. After the closure of landfills, other development, such as the building of housing, may have taken place in proximity, which could be sensitive to any change in the historic site, and the need to avoid negative impacts from disturbing a settled waste mass must be considered very carefully. Generally, the disturbance of existing waste masses containing hazardous waste should be avoided due to the risks associated with it. An Environmental Permit, intended to ensure there is no pollution of the environment or harm to human health will also likely be required for any such activity and advice from the Environment Agency should be sought.

Deposit of Inert Waste on Land for Beneficial Purposes

- 9.55 Some inert waste (mainly excavation waste e.g. soils and subsoils) is of a nature that lends itself for use in engineering operations such as landscaping and engineered structures such as flood defences or amenity bunds. To mitigate impacts on landscape and visual amenity, voids created by mineral working often require restoration by backfilling.
- 9.56 In waste hierarchy terms, the beneficial use of inert waste on land is classed as ‘other recovery’. Policy SI 7 of The London Plan expects that 100% of inert excavation waste to be put to a beneficial use.
- 9.57 The availability of land in west London for the deposit of inert excavation waste is constrained and so such waste may be transported outside of London for management. Paragraph 9.8.1 of the London Plan 2021 recognises that the target net self-sufficiency by 2026 does not apply to excavation waste in particular.

Policy WLWP 5 – Recovery and Disposal of Waste to Land

A. Proposals for the deposit of inert waste to land will be supported in principle where it is demonstrated that:

- a) the waste will be deposited for a beneficial purpose, which cannot practicably or reasonably be achieved in any other way; and
- b) the minimum amount of waste necessary will be used to deliver intended benefits or improvements; and
- c) It is not practical to re-use or recycle the waste.

B. Proposals for the disposal of non-inert or inert waste to land will be resisted unless it can be demonstrated that:

- a) there is an overriding need for additional disposal capacity; and
- b) the waste cannot practicably and reasonably be re-used, recycled, or recovered in some other way in any other way; and
- c) measures to maximise landfill gas capture and utilisation and minimise leachate production from the proposal.

C. In all cases, the resulting final landform, landscaping treatment and afteruses must be designed to take account of and, where appropriate, enhance the surrounding landscape, topography and the natural and historic environment.

Policy WLWP 6 – Circular Economy and Resource Efficiency

Policy Purpose: To drive waste reduction and high-value resource recovery in west London, all development proposals for new or substantially redeveloped waste management facilities must demonstrate how Circular Economy principles will be integrated.

- 9.58 Circular Economy principles are an alternative to a traditional linear economy (make, use, dispose) and keeps resources in use for as long as possible until the resources and products are recovered and regenerated at the end of each service life. This means, therefore, that proposals coming forward should be designed so that materials are kept in use for as long as possible, via reuse and repair, and high quality locally relevant recovery.
- 9.59 Integrating circular economy principles into waste management and related development delivers a wide range of environmental, social and economic benefits. By keeping materials in use for longer, circular approaches contribute to reducing the demand for the extraction of virgin materials, reducing associated environmental impacts including-carbon emissions. Waste related development designed to support repair, remanufacturing, recycling and innovative reuse centres can support local job creation in emerging green industries while reducing a reliance on landfill and incineration.
- 9.60 Planning will need to play a role in delivery of the necessary infrastructure to facilitate the circular economy, although it is recognised that delivery will also need to be on a strategic level with reliance on other parties. There is a need to consider the current, future and legacy waste infrastructure, and what waste management looks like in a fully circular economy. Delivery may be through local Circular Economy Hubs that facilitate material exchange, re-use and remanufacturing, supported by a network of local high quality facilities combined with larger-scale infrastructure. There should be consideration as to how proposals integrate with the existing network, ensuring where relevant there is inclusive public access, as well as integration with existing communities including local groups. Proposals for waste related development located in or near designated industrial areas should seek synergies with the wider needs of the locality. The co-location of waste uses with complementary industrial uses will be supported where it enhances resource efficiency.

Circular Economy Statements

- 9.61 Supporting information with an application for waste related development should be proportionate to the nature and scale of the proposal, detailing how materials will be managed throughout the lifecycle of the facility. A Circular Economy Statement or checklist should be submitted in accordance with London Plan Policy SI 7 and relevant Local Plan policy requirements.
- 9.62 Construction of waste related built development should maximise the use of recycled and/or reused materials and sourcing of materials should prioritise local supply. There should be consideration as to how built development can be designed and constructed to ensure that it is less likely to result in waste being produced in the first place. Examples include using modular off-site construction techniques and designing built development in ways to facilitate adaptable to changes in their use.
- 9.63 Proposals for waste related development are expected to demonstrate how the development will integrate with digital technologies, modular systems and be located close to complementary land uses (e.g. energy users, users of materials and logistics) to maximise resource efficiency opportunities.
- 9.64 Soil management is essential to sustaining all natural systems, and impacts across a range of matters including landscape, ecology, forestry, flooding and contaminated land issues. The retention of healthy soil structure is essential and can be aided by minimising the installation of hard surfaces on development sites. Where appropriate, applicants may need to submit a soil survey and soils management plan that sets out the quality and type of soils on site, the impact of development on the soil, as well as detail on how the movement and damage to soils will be minimised during construction.
- 9.65 Policy WLWP6 provides the framework on the specific requirements for the land, facilities and infrastructure required to deliver the local needs to support the principles of the circular economy and promote sustainable waste management practices within the Plan area. This Policy should be read in conjunction with other strategic and local planning policies set out in the London Plan, Borough or OPDC Local Plans, Development Management Policy documents, Site Allocations and Area Action Plans as appropriate. In particular, waste related proposals should support local development plan policies on waste, industrial land, climate resilience and biodiversity.

Policy WLWP 6: Circular Economy and Resource Efficiency

Proposals for waste related development should:

- A. ensure, where practicable, that waste infrastructure supports the transition to a low-carbon circular economy, consistent with the London Environment Strategy (current and any subsequent update) and relevant local sustainability targets, by demonstrating how the proposal will ensure materials are managed at the highest level of the Waste Hierarchy; and
- B. demonstrate how Circular Economy principles have been incorporated into all aspects of its design, construction and operation.

10 Policies Map

10.2 The Policies Map for the Plan comprises location maps of the existing waste sites proposed to be safeguarded shown in Appendix 3.

11 Glossary

A	
Agent of change	A new development within an area that is of such a nature that it might be impacted by existing development or impact on that development (e.g. housing proposed within an industrial area). The 'agent of change principle' sets out a position that an applicant for planning permission (i.e. the 'agent of change') is responsible for managing any conflicts between the proposed development and existing development.
Aggregates and soils recycling	Rubble, hardcore and soil from construction and demolition projects may be retained for use on-site in place of primary aggregate. Alternatively, it can be taken to purpose-built facilities for crushing, screening and re- sale.
Agricultural waste	This mostly covers natural waste such as animal slurry/by products but also scrap metals, plastics, batteries, oils, tyres, etc. The regulations for this waste stream mean farmers can no longer manage certain waste produced within a farm unit, within the unit (historically the case) as regulations determine whether or not waste can be burnt, buried, stored or used on the farm or must be sent elsewhere for management.
Amenity	Amenity is a broad concept and is not specifically defined in Planning legislation. It is a matter of interpretation by the local planning authority and is usually understood to be the pleasant or normally satisfactory aspects of a location which contribute to its overall character and the enjoyment of residents, business users and visitors. Amenity can be adversely affected by development impacts such as noise, dust, odour and visual change.
Anaerobic Digestion (AD)	A process comprising the breakdown of organic material in the absence of air. It is carried out in an enclosed vessel and produces methane that powers an engine used to produce electricity. The useful outcomes of AD are electricity, heat, and the solid material left over called the digestate. Both the heat and the electricity can be used or sold if there is a market and the digestate can either be sold or used for agricultural purposes (land spread). AD can only be used for some biodegradable parts of the waste stream e.g. sewage sludge, agricultural waste and some organic municipal and industrial waste.
Apportionment	The amount of HIC waste allocated by the London Plan to each London Borough for which management capacity needs to be provided.

Authority Monitoring Report (AMR)	The AMR reports progress in meeting the milestones of the adopted Local Development Scheme and monitors the impact of policies when the plans are adopted. The timescale covered in each report is determined by the nature of the topic in terms of its strategic importance and sensitivity to changing circumstance.
B	
Best and most versatile agricultural land	Land categorised as being of grades 1, 2 or 3a under the Agricultural Land Classification system.
Bioaerosols	Airborne material containing biological material from animals, plants, insects or microorganisms. They are produced wherever biological material is being processed, milled, or chopped and are commonly associated with organic waste composting facilities. Bioaerosols can have impacts on health.
Biodegradable waste	Any waste that is capable of undergoing natural decomposition, such as food and garden waste, paper and cardboard.
Biodiversity	The variety of all life on earth (mammals, birds, fish, invertebrates, plants, etc). In planning, it is often used to refer to nature conservation.
C	
Catchment	The geographical area served by a particular waste management activity. This will vary according to the adequacy of transport links and the economics of transporting different types of waste
Circular Economy	A circular economy is an alternative to a traditional linear economy (make, use, dispose) in which resources are kept in use for as long as possible, the maximum value is extracted from goods and services whilst in use, and, finally, resources and products are recovered and regenerated at the end of each service life.
Climate change adaptation	Adjustments to natural or human systems in response to actual or expected climatic factors or their effects, including from changes in rainfall and rising temperatures, which mitigate harm or exploit beneficial opportunities
Climate change mitigation	Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.
Combined heat and power facilities (CHP)	CHP plants generate electricity as well as providing local heat, and sometimes even cooling, to various types of users.
Commercial and Industrial (C & I) Waste	Waste generated by business and industry, for example: wholesalers; catering establishments; shops and offices; factories and industrial plants. Generally, businesses are expected to make their own arrangements for the collection, treatment and disposal of waste generated by their actions. Waste from smaller businesses where collection arrangements have been set up by the local authority is considered to be LACW.

Composting	The breaking down of organic matter aerobically into a stable material that can be used as a fertiliser or soil conditioner. This can be undertaken commercially in open air (in 'windrows') or inside containment ('in-vessel'), and at a smaller scale by households at home or collectively by communities.
Conservation Area	An area designated by the LPA because of its special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance.
Contaminated Land	Contaminated land is land that has been polluted or harmed in some way making it unfit for safe development and usage unless cleaned.
Construction, Demolition and Excavation (C, D & E) Waste	The combined waste produced from earth moving, demolition of buildings/structures and construction of new buildings/structures. It mostly comprises brick, concrete, hardcore, subsoil and topsoil, but can also include timber, metals and plastics.
D	
Decentralised Energy	Local renewable energy and local low-carbon energy usually but not always on a relatively small scale that may encompass a range of technologies.
Deposit of Waste on Land	The placement of waste on land for the purpose of its management. This may include landfill or landraise operations, or, in the case of inert waste may involve its use in engineering works such as landscaping mounds.
Development Plan	The development plan has statutory status as the starting point for decision making. Section 38(6) of the Planning & Compulsory Purchase Act 2004 and Section 70(2) of the TCPA 1990 require that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. For waste proposals within London the development plan comprises the London Plan, Local Plans and DPDs and joint Waste Plans as well as neighbourhood plans.
Disposal	Disposal means any waste management operation which is not 'recovery' even where the operation has a secondary consequence, the reclamation of substances or energy
Dry Mixed Recyclables (DMR)	Typically composed of: Paper - e.g. dry paper waste, newspapers, office paper and magazines Cardboard – e.g. corrugated cardboard, cereal boxes and card Metal cans – e.g. clean, empty drinks cans and food tins Plastic – e.g. packaging films, rinsed out milk bottles, empty drinks bottles & clean salad trays, rinsed out margarine tubs & microwaveable meal trays

E	
Encroachment	Development which is sensitive to the normal operations of a waste/wastewater facility being built near to an existing such facility which may hinder its operation by requiring changes to its operating practices (e.g. reduced vehicle movements, operating hours)
Energy from Waste (EfW)	The process of managing waste to generate energy - usually in the form of electricity or heat usually by means of thermal treatment. Many wastes are combustible, with relatively high calorific values – this energy can be recovered through processes such as incineration with electricity generation, gasification or pyrolysis. EfW generally falls within the ‘other recovery’ category in the waste hierarchy.
Energy Recovery	Covers a number of technologies, though most energy recovery is through incineration. Many wastes are combustible, with relatively high calorific values – this energy can be recovered through processes such as incineration with electricity generation (and where possible heat recovery), gasification or pyrolysis.
European Site	Sites designated for their nature conservation importance (under the EC Birds Directive and EC Habitats and Species Directive) and protected by the Habitats Regulations. This includes Special Protection Areas (SPAs) for birds, and Special Areas of Conservation (SACs) under the Habitats Directive.
G	
Green Belt	A national planning designation, which aims to prevent urban sprawl by keeping land around certain cities and large built-up areas permanently open or largely undeveloped, defined more fully in the NPPF.
Greenfield land	Land that has not been developed. Not to be confused with Green Belt.
Greenhouse gas (GHG)	GHGs trap heat in the atmosphere. Many gases exhibit greenhouse properties, including carbon dioxide, methane, water vapour, and nitrous oxide.
Green and blue infrastructure	A network of multi-functional green space or wetlands and waterways, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.
H	
Habitats Regulation Assessment (HRA)	An assessment under the Habitats Regulations to test if a plan or project could significantly harm the designated features of a ‘Habitat site’. Proposals affecting proposed SACs, potential SPAs, Ramsar Sites (wetlands of international importance) also require HRA.

Hazardous waste	Controlled waste that is dangerous or difficult to treat, keep, store or dispose of, so that special provision is required for dealing with it. Hazardous wastes are the more dangerous wastes and include toxic wastes, acids, alkaline solutions, asbestos, fluorescent tubes, batteries, oil, fly ash (flue ash), industrial solvents, oily sludges, pesticides, pharmaceutical compounds, photographic chemicals, waste oils, wood preservatives. If improperly handled, treated or disposed of, a waste that, by virtue of its composition, carries the risk of death, injury or impairment of health, to humans or animals, the pollution of waters, or could have an unacceptable environmental impact. It should be used only to describe wastes that contain sufficient of these materials to render the waste as a whole hazardous within the definition given above. Defined in the Hazardous Waste (England and Wales) Regulations 2005 (as amended).
Heritage assets	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Designated Heritage assets are the most protected and include listed buildings, scheduled ancient monuments, registered parks and gardens, registered battlefields, and World Heritage Sites.
Household waste	Waste from a domestic property, caravan, and residential home or from premises forming part of a university or school or other educational establishment and premises forming part of a hospital or nursing home. Defined in The Controlled Waste (England & Wales) Regulations 2012.
I	
Incineration	The controlled burning of waste usually in purpose-built plant subject to stringent standards for emissions to air. Bottom ash may be used in building materials. Incineration that involves the capture of energy falls within the category 'Energy from Waste'.
Inert waste	Inert waste means waste that does not undergo any significant physical, chemical or biological transformations when untreated. Inert waste will not dissolve, burn or otherwise physically or chemically react, biodegrade or adversely affect other matter with which it comes into contact in a way likely to give rise to environmental pollution or harm human health. The total leachability and pollutant content of the waste and the ecotoxicity of the leachate must be insignificant, and in particular must not endanger the quality of surface water and/or groundwater. Non-inert (including non-hazardous) waste is all other waste other than as identified above (including hazardous).

L	
Landfill and landraise	The term landfill relates to waste disposal mainly below ground level (by filling a void) whereas landraise refers to waste disposal mainly above pre-existing ground levels. They are generally the least preferred method of waste management in the waste hierarchy.
Listed buildings	A building of special architectural or historic interest in a list compiled by the Secretary of State under the Planning (Listed Buildings & Conservation Areas) Act 1990, thereby having statutory protection. Listing of buildings includes the interior as well as the exterior of the building, and any nearby buildings or permanent structures within the curtilage (e.g. walls and outbuildings). Historic England is responsible for designating buildings for listing in England.
Local Authority Collected Waste (LACW)	All waste collected by or on behalf of a local authority. It includes household waste and other waste where collection is arranged by the local authority. LACW replaced the term 'municipal' waste.
Local Development Scheme	The timetable produced by each LPA for the preparation of Local Plans.
Local Nature Reserves (LNRs)	An area designated by local authorities, in consultation with Natural England under the National Parks & Access to the Countryside Act 1949, to provide opportunities for educational use and public enjoyment, in addition to protecting wildlife or geological and physiographical features of special interest.
Local Planning Authorities (LPAs)	The public authority whose duty it is to carry out specific planning functions for a particular area.
Local Plan	A plan for the future development of a local area, drawn up by the LPA in consultation with the community. In law this is described as the development plan documents adopted under the Planning & Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under law would be considered to be DPDs, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.
Local roads	These are taken to include: A roads (not including trunk roads and primary routes). B roads – which are roads intended to connect different areas, and to feed traffic between A roads and smaller roads on the network. Classified unnumbered roads which are smaller roads intended to connect together unclassified roads with A and B roads, and often linking a housing estate or a village to the rest of the network. Similar to 'minor roads' on an Ordnance Survey map and sometimes known unofficially as C roads. Unclassified roads which are local roads intended for local traffic. The vast majority (60%) of roads in the UK fall within this category.
LSIS	Locally Significant Industrial Sites.

M	
Major development	For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m ² or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.
Mass burn incinerator	Large facilities where waste is burnt, and normally where energy is captured for use to produce electricity as a minimum.
N	
National Planning Policy Framework (NPPF)	The NPPF sets out the Government's planning policies for England and how these are expected to be applied.
National Planning Policy for Waste (NPPW)	Adopted in October 2014, this document sets out the Government's waste planning policies for England.
Net self-sufficiency	To have sufficient waste management capacity capable of managing the equivalent amount of waste to that expected to arise within a Plan area.
Non-inert waste	A waste that will biodegrade or decompose, releasing environmental pollutants. Examples include: wood and wood products, paper and cardboard, vegetation and vegetable matter, leather, rubber and food processing wastes.
O	
Open space	All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.
Other Recovery	Other recovery is not specifically defined in the revised Waste Framework Directive, although 'energy recovery' is referenced as an example. It can be assumed by their exclusion in the definition of recycling, that processing of wastes into materials to be used as fuels or for backfilling can be considered 'other recovery'.

P	
Plan area	The geographical area covered by the West London Joint Waste Plan i.e. the area covered by the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond upon Thames and that part of Ealing and Brent that falls under the aegis of OPDC.
Pollution	Anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.
Planning Practice Guidance (PPG)	Government guidance intended to assist practitioners in interpreting national planning policy.
Previously developed land	Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardsurfacing providing it has been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.
Proximity Principle	The 'proximity principle' is set out in paragraph 4 of Part 1 of Schedule 1 to the <i>Waste (England and Wales) Regulations 2011</i> within the context of the requirement for mixed municipal waste collected from private households to be disposed of, or recovered, in one of the nearest appropriate installations, by means of the most appropriate methods and technologies, in order to ensure a high level of protection for the environment and public health.
Public Rights of Way (PRoW)	PRoW are paths that all members of the public can legally use: footpaths – for walking, running, in mobility scooters or powered wheelchairs; bridleways – for walking, horse riding, bicycles, mobility scooters or powered wheelchairs; restricted byways – for any transport without a motor and mobility scooters or powered wheelchairs; byways open to all traffic – for any kind of transport, including cars (but mainly used by walkers, cyclists and horse riders).
Pyrolysis	The combustion of waste in the absence of oxygen, resulting in the production of liquid, gas, char, whose after-use depends on the type of waste incinerated.

R	
Receptor	Existing land uses that could be affected by a proposed development. Some examples of receptors include: Residential dwellings; hospitals; commercial premises; and, footpaths.
Recovery	Recovery means any waste management operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfill a particular function, or waste being prepared to fulfill that function, in the plant or in the wider economy.
Recovery to Land	The use of inert material for a genuine beneficial use such as landscape and/or amenity improvements.
Recycling	Recycling is a recovery operation by which waste materials are returned to be processed into products, materials or substances whether for the original e.g. glass to remelt or other purposes e.g. glass to aggregate. Includes the reprocessing of organic material but not energy recovery or the reprocessing into materials that are to be used as fuels or for backfilling operations.
Refuse Derived Fuel (RDF)	Residual waste that is prepared for thermal treatment in an energy from waste facility or co-incineration plant.
Renewable and low carbon energy	Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass, ground and air, and geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).
Residual waste	The elements of the waste streams that remain following the maximising of recovery operations. Residual waste now defined as that managed by landfill, EfW and as RDF.
Restoration	Process of returning a site or area to a desirable condition following waste management use or mineral extraction.
Reuse	Re-using products and materials as part of the circular economy, avoiding the need for re-processing or disposal. The preferred fate on the waste hierarchy for waste produced. The commercial sector can reuse products designed to be used a number of times, such as reusable packaging. Householders can buy refillable containers or reuse plastic bags. Reuse can save raw materials, energy and transport costs.
S	
Safeguarding	The protection of existing waste sites from development that may limit or constrain such uses, now or in the future.
Sites of Special Scientific Interest (SSSI)	A site which is of special interest by reason of any of its flora, fauna, or geological or physiographical features and has been designated by Natural England under the Wildlife and Countryside Act 1981.

Special Areas of Conservation (SAC)	Areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites.
Special Protection Areas (SPAs)	Areas classified under regulation 15 of the Conservation of Habitats and Species Regulations 2017 which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds.
Strategic Industrial Locations	Sites identified (including in the London Plan, Policy E5) as critical to the London economy and which can accommodate concentrations of industrial, logistics and related activities and land uses including waste management.
Sustainability Appraisal (SA)	A process of analysing and evaluating the environmental, social and economic impacts of the plan or programme, often in conjunction with an SEA.
Sustainable Waste Management	Waste management in line with the waste hierarchy in which waste generation is avoided as far as possible, materials and products are re-used, recycled or have as much value recovered from them as possible, before disposal is considered. This is delivered through product design, behaviour and choices, and through provision of sufficient waste management capacity of the required type, where possible proximate to where waste arises.
Supplementary planning documents	Planning documents which expand upon policy or provide further detail to policies in development plan documents, but do not have development plan status
T	
Thermal treatment	A waste management operation that involves the use of heat to process waste and generally involves the production of energy. Incineration is a thermal treatment but 'Energy from waste' is the term more generally used to describe waste management involving incineration.
Tonne	Metric Ton. 1000 kilos, equal to 2004 lbs.
tpa	Tonnes per annum
Mtpa	Million tonnes per annum.
W	
Waste	Any substance or object that the holder or the possessor discards or intends to discard or is required to discard.
Waste arisings	This is the amount of waste produced in a given area, normally a Plan area, at a given period of time, usually reported as tpa.
Waste Disposal Authority (WDA)	A local authority responsible for managing the waste collected by the collection authorities and the provision of household waste recovery centres. In this case the West London Waste Authority (WLWA) is a joint WDA for the whole Plan area.

Waste Hierarchy	A framework for management of waste, which ranks waste management options according to what is best for the environment. The most preferable option is preventing waste generation, followed by preparing materials for re-use, then recycling and composting, then recovering as much value from them as possible including energy. Disposal to landfill or incineration without energy recovery at the bottom as last the option of last resort.
Waste Planning Authority (WPA)	The local authority responsible for waste development planning and development management. In this case the West London Local Planning Authorities.
Waste streams	Waste that may arise from distinct activity such as 'commercial and industrial', 'construction, demolition and excavation, or has specific characteristics such as 'hazardous'.
Wastewater	Water discharged to sewers including waste in liquid form as well as surface water runoff. This raw wastewater is collected in sewers and transferred to wastewater treatment works where it is treated in such a way that produces largely reusable sewage sludge and effluent that is discharged to watercourses.
Water environment	The "water environment" encompasses all waterbodies and ecosystems that are influenced by water, including rivers, lakes, wetlands, groundwater, coastal waters, and seas. It also involves the complex interactions between water, land, and living organisms, as well as the human activities that affect these systems. The water environment therefore includes the broader ecological and environmental context in which water exists. This includes the quality, availability, and sustainability of water resources, as well as the impact of human activities on these water bodies.

Appendices

Appendix 1 – Monitoring Framework

Monitoring of the West London Waste Plan will take place in accordance with the framework set out below. Results will be reported in Authority Monitoring Reports.

Introduction

This Monitoring Framework explains how implementation of the West London Waste Plan (WLWP) will be monitored over the plan period. It translates the Strategic Objectives and Plan Policies into a set of measurable indicators, targets and review triggers so that it is possible to establish how effective implementation of the Policies are in achieving the Strategic Objectives and the extent to which corrective action may be needed.

Monitoring will take place at least annually and outcomes reported Authority Monitoring Reports.

Structure

- The indicators are grouped under each of the Strategic Objectives and mapped to the policies intended to achieve the specific objectives. This ensures that there is a coherent thread from the Vision and Objectives to policy delivery and measurable outcomes.
- The framework focuses on indicators that are material to decision-making and measurable from established datasets.
- Each entry identifies the bodies primarily responsible for delivering the outcomes each of the policies is intended to achieve (not just collecting data). The fact that there may be more than one body identified with responsibility illustrates that there is shared responsibility in achieving the Plan's objectives.

Column headings associated with the Monitoring Framework are explained below:

- **Policy** – The reference number of the Policy which the indicator is seeking to monitor the efficacy and implementation of;
- **Indicator** – What the monitoring indicator is intended to measure;
- **Purpose** – How the indicator will monitor for the policy outcome;
- **Target** – The intended measure of success achieved by implementation of the Policy;
- **Data Sources** – various sources of data available to measure implementation of the policy. The framework relies on publicly accessible statutory/official datasets and local registers (e.g., Waste Data Interrogator, WasteDataFlow,

Hazardous Waste Interrogator, Environment Agency permit register, local planning registers and compliance data gathered). Where data is incomplete, an explanation will be provided in the AMR, and, if appropriate, interim proxy indicators used until full data is available. During the Plan period the LPAs may also monitor additional indicators and report on associated performance in the AMRs as additional datasets become available.

- **Delivery Responsibility** – which bodies contribute towards implementation of the policy:
 - Local Planning Authorities (LPAs): maintain planning registers, apply policies through development management decisions, and report through AMRs.
 - WLWA and operators: supply operational data and are primarily responsible for the type and quantum of waste management capacity provided in the Plan area.
 - Environment Agency (EA): Maintains the WDI and HWDI, as well as permit registers. The EA also issues Environmental Permits which permit the operation of waste management facilities including conditions to limit pollution events and enforces these conditions.
 - Strategic partners (e.g., Network Rail, Port of London Authority, GLA): support safeguarding and utilisation of rail/water transport capacity.

Strategic Objective 1: Make best use of existing waste infrastructure to manage waste efficiently

Ref.	Policy	Indicator	Purpose	Target	Data Sources	Delivery Responsibility
1	WLWP 1	HIC waste qualifying management capacity (tpa)	Ensure local capacity is sufficient to ensure London Plan apportionments are met for duration of Plan period	Provide sufficient qualifying capacity that meets collective WLWP London Plan apportionments	Planning register; EA permit register; DM teams; Operators inc. WLWA. Waste Data Interrogator (WDI); Wastedataflow;	Local planning authorities (LPAs), Waste Industry, Environment Agency (EA) WLWA (LACW)
2	WLWP 1	C & D waste arisings and recovery capacity (tpa)	Maintain self-sufficiency for C & D waste for duration of Plan period Ensure London Plan management targets are met,	C & D waste arisings are less than, or equivalent to, C&D waste capacity in West London (WL)	WDI; planning register; EA permit register; DM teams; Operators inc. WLWA	LPAs, Waste Industry, EA
3	WLWP 2	Hazardous waste arisings, capacity and exports (tpa)	Provide for identified hazardous waste management needs	Capacity sufficient to meet identified WL / London need except where capacity elsewhere is confirmed as secure.	Hazardous Waste Data Interrogator (HWDI); planning register; EA permit register; DM teams; Operators.	LPAs, Waste Industry, EA
4	WLWP 1	Safeguarded HIC waste management capacity (tpa)	Maintain sufficient existing HIC waste management capacity	No net loss of safeguarded HIC waste management capacity	Planning register; EA permit register; DM teams; WDI.	LPAs, developers
5	WLWP 1	Safeguarded C&D waste management capacity (tpa)	Maintain sufficient C&D waste management capacity	No net loss of safeguarded C&D waste management capacity	Planning register; EA permit register; DM teams; WDI.	LPAs, developers

6	WLWP 1	Safeguarded hazardous waste management capacity (tpa)	Maintain sufficient hazardous waste management capacity	No net loss of safeguarded hazardous waste management capacity	Planning register; EA permit register; DM teams; HWDI.	LPAs, developers
7	WLWP 1	Nature of new development adjacent to existing waste site.	Ensure new development does not encroach on/limit potential of safeguarded existing waste operations	New development only consented with appropriate mitigation	Planning register; DM teams	LPAs, developers

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Strategic Objective 2: Encourage facilities that contribute to the achievement of a Circular Economy to come forward

Ref.	Policy	Indicator	Purpose	Target	Data Sources	Delivery Responsibility
8	WLWP 2 & WLWP 6	No. of Circular Economy (CE) Hubs	Reduce waste production through reuse, repair and material exchange	1 CE hub per LPA area	Planning register; DM teams; EA permit / exemptions register (if applicable);	LPAs, industry, WLWA, developers
9	WLWP 2	Sufficient capacity for recycling rate for municipal (HIC) waste to be achieved(%)	Minimise production of residual waste i.e. waste left after reuse/ recycling maximised	Meet/exceed London Plan recycling targets (≥65% by 2030 for municipal waste)	WDI; Wastedataflow; WLWA GLA municipal waste dataset	LPAs, WLWA, Waste Industry, EA
10	WLWP 2	Sufficient capacity for recycling rate for C&D waste to be achieved(%)	Minimise production of residual waste i.e. waste left after reuse/ recycling maximised	95% recycling / reuse / recovery of C&D waste	WDI; DM Teams LAA (recycled aggregate supply) SWMP and Circular Economy Statements submitted by developers	LPAs, Waste Industry, EA, Developers via SWMP and Circular Economy Statements
11	WLWP 2	Sufficient capacity to facilitate beneficial use of inert excavation waste (%) inc railheads	Maximise beneficial use of inert excavation waste.	100% inert excavation waste put to beneficial use as per London Plan target..	WDI; DM teams SWMP and Circular Economy Statements submitted by developers	LPAs, WLWA, Waste Industry, EA, Developers via SWMP and Circular Economy Statements

12	WLWP 2	Landfill rate for biodegradable or recyclable waste (%)	Disposal to landfill as last resort for non residual waste	No biodegradable or recyclable waste sent to landfill from 2026 onwards.	WDI; Wastedataflow; WLWA Landfill Tax returns	LPAs, WLWA, Waste Industry, EA, HMRC
13	WLWP 2	Location of facilities	Facilities are in appropriate locations	100% of newly consented waste management facilities in locations described in WLWP2	Planning register; EA permit / exemptions register; DM teams;	LPAs, Waste Industry, EA

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Strategic Objective 3: Decarbonise waste transport and processing

Ref.	Policy	Indicator	Purpose	Target	Data Sources	Delivery Responsibility
14	WLWP 3	% of newly consented EfW projects with local heat utilisation	Reduce carbon emissions from EfW by recovering waste heat	100% of newly consented EfW projects to include heat network plans	Planning register; EA permits; DM teams	LPAs, local energy providers, waste industry, developers, EA
15	WLWP 1	Number of railheads / wharves safeguarded for waste transport	Support low-carbon waste transport (rail/water freight)	No net loss of rail/water freight capacity unless associated waste use lost..	Planning register; EA permits; DM teams	LPAs, transport authorities (Network Rail, PLA), WLWA, GLA, developers
16	WLWP 3; WLWP 4	Non-biogenic gaseous carbon emissions emitted as part of a waste management process	Reduce carbon emissions from waste processing	Annual reduction in non-biogenic gaseous carbon emissions that are emitted as part of waste processing operation e.g. EfW.	Annual EA permit monitoring data	LPAs, WLWA, Waste Industry, EA

Strategic Objective 4: Deliver High Quality Waste Facilities (Protect and Enhance the Environment and Communities)

Ref.	Policy	Indicator	Purpose	Target	Data Sources	Delivery Responsibility
17	WLWP 4	New waste facilities with low-emission vehicle measures and traffic management plans (%)	Control and mitigate impacts from waste vehicles.	100% of new waste facility permissions include measures to control, reduce and mitigate impacts from vehicles	Planning register (conditions/obligations); operator fleet data	LPAs; waste operators; WLWA; local highways authorities
18	WLWP 4; WLWP5	Number of serious (Category 1 or 2) pollution incidents and statutory nuisance incidents at waste management sites (per year)	Avoid unacceptable adverse impacts on environment and communities (e.g. pollution, nuisance).	0 serious and statutory nuisance incidents per year.	EA incident reports; EA permit compliance data; local authority environmental health records	EA; waste site operators; LPAs

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Strategic Objective 5: Ensure sufficient capacity of the right type in the right place so that unavoidable residual waste produced is managed safely and effectively.

Ref.	Policy	Indicator	Purpose	Target	Data Sources	Delivery Responsibility
19	WLWP 5	Type of waste managed by landfill or EfW or export as RDF	Management of waste up the waste hierarchy	Only waste which cannot be managed by other means is managed by landfill, EfW or as RDF.	WDI; Wastedataflow	LPAs, WLWA, Waste Industry, EA

Appendix 2 – List of Safeguarded Sites

Notes: 'Lawful over time' or 'Lawful waste use' entry is based on evidence available to the relevant LPA at the time and is not intended to confer formal confirmation of lawfulness of the use. This would need to be confirmed through submission of an application for an CLEUD or a planning application.'

Abbreviations

- CLEUD = Certificate of Lawful Existing Use or Development
- WTS = Waste Transfer Station⁴⁵

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⁴⁵ Site type based on Environment Agency permitting categories; sites identified as waste transfer may be conducting treatment as well.

London Borough of Brent: 10 Sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
B04	Neasden Sidings, Drury Way, Wembley	Quattro Limited obo WRG (Midlands) Limited	Transfer	250,000	CDEW (Excavation)	Lawful waste use	2018	y
B05	Atlas Road Wembley	O'Hara Bros. Aggregates Limited	Non-haz Treatment	24,180	CDEW	CLEUD	2023	
B06	Unit 4, Second Way, Wembley	HAWK Rubbish Clearance Limited	Non-haz Treatment	65,575	CDEW	Temporary Planning	2015	
B07	SRC Aggregates Wembley Depot	Sewells Reservoir Construction Limited	Transfer	66,596	CDEW	Lawful waste use	2022	
B10	Unit 28, Fourth Way WTF	Brent Oil Contractors Limited	Transfer	4,903	Hazardous	CLEUD	2007	
B12	Unit 2, Hannah Close	LondonEnergy Ltd	Treatment	399,000	HIC	Permanent Permission	2021 ⁴⁶	
B13	Alperton Lane Waste Transfer Station	Sortera	Treatment	300,000	CDEW/HIC/Haz	Permanent Permission	2015	
B14	Brent Transfer Station, Alperton Lane	Veolia ES (UK) Ltd	Transfer	365,000	HIC	Permanent Permission	2016	
B15	Wembley Transfer Station & Recycling Facility	Biffa Waste	Transfer	150,000	HIC	CLEUD	2002	
B16	off Great Central Way, Neasden,	L & B Haulage & Engineering	Transfer	16,696	CDEW	Lawful over time'	1998	

⁴⁶ Site was previously permitted.

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London Borough of Brent/OPDC: 3 Sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
B01	Twyford WTS Abbey Road	West London Waste Authority	WTS	30,003	LACW	CLEUD	1993	
B02	100 Twyford Abbey Road ⁴⁷	Bridgemarts	WTS	91,492	CDEW	Permanent Permission	Surrendered	
B08	Willesden F Sidings Rail Freight Terminal	Cappagh Public Works Limited	Transfer	10,400	CDEW (Excavation)	Permanent Permission	2018	y

⁴⁷ Site has planning permission for alternative use. Site E20 has been identified as compensatory provision but the process to secure provision has still to be completed, so site remains safeguarded until such time as it is.

London Borough of Ealing: 14 Sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
E01	Greenford Depot Reuse & Recycling Centre	Ealing Council	Transfer	13,268	HIC (LACW)	Permanent Permission	1977	
E02	Acton Waste & Recycling Centre	Ealing Council	Transfer	3,881	HIC (LACW)	Permanent Permission	1994	
E05	WTS Station Approach Greenford	360 Waste Limited	Non-haz Treatment	3,099	CDEW	Permanent Permission	2023	
E06	British Rail Goods Yard, Greenford	Link2london Ltd	Transfer	131,985	CDEW & HIC	Permanent Permission	2003	
E07	Horn Lane Waste Transfer Station	Quattro (UK) Limited	Transfer	17,618	CDEW & HIC	Lawful over time	1993	
E08	163-165 Brent Rd, International Trading Estate	Link2london Ltd (formerly J Simpson Waste Management)	Transfer	40,699	CDEW	Temporary Permission to 2027	2024	
E09	Stone Terminal (aka Western Regions Good Yard), 205 Horn Lane	Holcim UK Ltd (formerly Aggregate Industries UK Limited)	Non-haz Treatment	79,777	CDEW	Lawful over time	2005	
E12	London Auto Parts Alperon Lane	London Auto Parts Limited	MRS	14,013	Hazardous	CLEUD	2003	
E14	Station Approach, Oldfield Lane North, Greenford	Link2london Ltd	Treatment	10,928	CDEW	Permanent Permission	2022	

	(Haulage World WTS)							
E15	Greenford Depot (Waste Transfer Station)	Ealing Council	Treatment	101,003	HIC (LACW)	Permanent Permission	1992	
E16	Oldfield Lane North, Greenford Ocean Estate Distribution Centre	GXO Logistics FST Limited	Transfer	4,399	HIC	Temporary Permission to 2026	2023	
E18	Colville Rd	Elis UK Ltd	Transfer	1,000	Hazardous	Permanent Permission	2024	
E19	Unit 42a Sheraton Business Park,	Autofleet Salvage Limited	MRS	2,500	Hazardous	Lawful over time	2015	
E20	Land off Collett Way ⁴⁸	Wards of London Properties Ltd	Non-haz Treatment	33,117 (after B02 deducted)	CDEW/HIC	Permanent Permission	2024	

London Borough of Ealing/OPDC : 2 sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
E11	Willesden Euro Terminal	Costain Limited (Formerly Skanska Construction UK Limited)	Transfer	600,000 ⁴⁹	CDEW (Excavation)	Deemed consent under HS2 Act 2017	2016	y
E13	First Mile Recycling Facility	First Mile Limited	Treatment	75,000	HIC	Permanent Permission	2017	

⁴⁸ Site provided as compensatory capacity for release of B02. Total capacity 150,000tpa.

⁴⁹ See *Capacity Assessment Report* BPP Consulting October 2025 for further detail.

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London Borough of Harrow: 2 Sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (Tpa)	Waste Type Managed	Grounds For Safeguarding	Permit Issued	Associated Railhead or wharf?
HA01	Forward Drive CA Site,	Harrow Council	WTS	30,757	HIC (LACW)	Permanent Permission	1990	
HA02	151 Pinner View	Harrow Breakers	MRS	2,247	Hazardous	CLUED	2005	

London Borough of Hillingdon : 23 Sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
HI01	New Years Green Lane CA Site & WTS	Hillingdon Council	WTS	75,000	HIC (LACW)	Permanent Permission	1989	
HI02	Airside Waste Sweepings Treatment Facility	Heathrow Airport Ltd	Treatment	70,000	HIC/Haz	Lawful over time	2015	
HI03	New Years Green Lane	B F A Recycling Limited	MRS	57,424	HIC	Lawful over time	2012	
HI04	WTS, Civic Way, Ruislip	B & K Environmental Services Limited	WTS	250,000	CDEW	Lawful over time	2007	
HI06	Land off Holloway Lane Harmondsworth	Foley Haulage Limited	Treatment	27,209	CDEW	CLEUD	2020	
HI07	GK Depot, Trout Road	Recycling With Skips Limited	Treatment	275,000	CDEW	CLEUD	2018	
HI08	Old Stockley Road, West Drayton	Hanson Quarry Products Europe Limited (formerly West Drayton Aggregates)	Treatment	35,077	CDEW	Lawful over time	2015	y
HI09	Holloway Lane Materials Recycling Facility	Powerday Plc	Treatment	63,758	CDEW/HIC	CLEUD	2002	
HI13	Skip Lane, Harvill Road	Sortera Limited (formerly Uxbridge Skip & Recycling Ltd)	Treatment	113,229	CDEW	Permanent Permission	1991	
HI14	WTS Off Rigby Lane	Talking Rubbish Waste Solutions Limited	Treatment	10,000	CDEW		2022	

HI15	Skip Lane, Harvill Road,	Thames Materials Limited (formerly Pioneer Concrete)	Treatment	766,031	CDEW (Excavation)	Lawful over time	2015	
HI16	Unit 1 Wallingford Road Recycling Facility	Uxbridge Recycling Limited (formerly A&A Recycling Ltd)	Treatment	15,760	CDEW	Permanent Permission	2012	
HI17	Crows Nest Farm	Country Compost Limited	Compost	24,900	HIC	Permanent Permission	2005	
HI18	High View Farm	West London Composting Limited	Compost	119,790	HIC	Permanent Permission	1995	
HI19	Hillingdon Clinical Waste Incinerator	Medisort Ltd	Incin	8,000	HIC/ Haz		2021	
HI20	Cranford Lane WTS, Heathrow	Heathrow Airport Limited	WTS	525	HIC	Lawful over time	1981	
HI21	Waybeards Farm, Hill End Road, Harefield	F J Heppelthwaite Solutions Limited (formerly Hep Oils)	WTS	6,451	HIC	Lawful over time	2008	
HI24	Heathrow Depot	FM Conway	Treatment	193,490	HIC/ Haz/ CDEW	Permanent Permission	2015	
HI25	Central Depot Harlington Road	Hillingdon Council	WTS	9,500	HIC (LACW)	Permanent Permission	2023	
HI27	Unit 1 & 2 Pump Lane Industrial Estate	Personnel Hygiene Services Limited	WTS	90,976	HIC	Lawful over time	1999	
HI28	Hayes Transfer Station Rigby Lane	Suez Recycling & Recovery UK Ltd	WTS	100,000	HIC	Permanent Permission	1993	
HI29	Victoria Road WTS	Suez Recycling & Recovery UK Ltd	WTS/RDF	250,047	HIC (LACW)	Permanent Permission	2014	y

London Borough of Hounslow: 10 Sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
HO01	Space Way C A Site	Hounslow Council	WTS	20,084	HIC (LACW)	Permanent Permission	2002	
HO2	Southall Lane Western International Market	Quattro (UK) Limited	Treatment	64,347	HIC/CDEW	Temporary Permission to 2027	2018	
HO3	St Albans Farm Recycling Facility	Ron Smith (Recycling) Limited	MRS	65,415	CDEW	Permanent Permission	1993	
HO04	Norris House	Globalparts- (UK) Limited	MRS	1,128	Hazardous	Permanent Permission	2019	
HO05	Mayer Parry, Brentford	European Metal Recycling Limited	MRS	74,999	LACW	Permanent Permission	1998	
HO07	Brentford Aggregate Materials Recycling Facility	Day Group Limited	Treatment	750,000	CDEW/HIC	CLEUD	2015	y
HO09	ATS Building, Amberley Way	Rubber Recycling Solutions Limited	Treatment	12,000	HIC	Lawful over time	2023	
HO11	Southall Lane Depot	Lampton Recycle 360 Limited	Treatment	30,000	HIC (LACW)	Permanent Permission	2017	
HO13	Isleworth Site, Fleming Way Trading Estate	Citron Hygiene (UK) Limited	WTS	687	HIC/Haz	Permanent Permission	2020	
HO14	Transport Avenue WTS	Suez Recycling & Recovery UK Ltd	WTS/RDF	195,000	HIC (LACW)	Permanent Permission	1993	y

London Borough of Richmond upon Thames: 4 Sites

Facility Id	Location	Operator	Facility Type	Assessed Capacity (tpa)	Waste Type Managed	Grounds for safeguarding	Permit Issued	Associated Railhead or wharf?
R01	Townmead C A Site	Richmond Upon Thames Council	WTS	21,584	HIC (LACW)	Permanent Permission	1996	
R02	The Royal Botanic Gardens, Kew	The Royal Botanic Gardens, Kew	Compost	5,000	HIC	Lawful over time	2012	
R03	Central Depot, Langhorn Drive	Richmond Upon Thames Council	WTS	26,702	HIC (LACW)	Permanent Permission	2013	
R04	Arlington	Sharpes Oil	Treatment	-	Hazardous	CLEUD	Surrendered in 2020	

Appendix 3 – Maps of Safeguarded Sites (see Separate Document)

Included in separate document due to file size

Appendix 4 – Replacement of Policies in the West London Waste Plan

The table below shows how the policies in the 2015 West London Waste Plan are replaced by those in the West London Waste Plan

West London Waste Plan (2015) Policies		Replacement Policies in the West London Waste Plan	
Policy WLWP 1	Provision of New Waste Management Capacity	Policy WLWP 2	Provision of Additional Waste Management Capacity
Policy WLWP2	Safeguarding and Protection of Existing and Allocated Waste Sites	Policy WLWP 1	Safeguarding and Optimising Waste Site Network
Policy WLWP 3	Location of Waste Development	Policy WLWP 2	Provision of Additional Waste Management Capacity
Policy WLWP 4	Ensuring High Quality Development	Policy WLWP 4	Ensuring High Quality and Resilient Waste Facilities
Policy WLWP 5	Decentralised Energy	Policy WLWP 3	Policy WLWP3 Residual Waste Management & Energy Recovery
Policy WLWP 6	Sustainable Site Waste Management	n/a	Not applicable as issues addressed through Local Plan and London Plan policies.
Policy WLWP 7	NPPF: Presumption in Favour of Sustainable Development	n/a	No longer necessary as integrated into policies.

CABINET FORWARD PLAN

Committee name	Residents' Services Select Committee
Officer reporting	Liz Penny, Democratic Services Officer
Papers with report	Appendix A – Latest Forward Plan
Ward	As shown on the Forward Plan

HEADLINES

To monitor the Cabinet's latest Forward Plan which sets out key decisions and other decisions to be taken by the Cabinet collectively and Cabinet Members individually over the coming year. The report sets out the actions available to the Committee.

RECOMMENDATION

That the Residents' Services Select Committee notes the Cabinet Forward Plan.

SUPPORTING INFORMATION

The Cabinet Forward Plan is published monthly, usually around the first or second week of each month. It is a rolling document giving the required public notice of future key decisions to be taken. Should a later edition of the Forward Plan be published after this agenda has been circulated, Democratic Services will update the Committee on any new items or changes at the meeting.

As part of its Terms of Reference, each Select Committee should consider the Forward Plan and, if it deems necessary, comment as appropriate to the decision-maker on the items listed which relate to services within its remit. For reference, the Forward Plan helpfully details which Select Committee's remit covers the relevant future decision item listed.

The Select Committee's monitoring role of the Forward Plan can be undertaken in a variety of ways, including both pre-decision and post-decision scrutiny of the items listed. The provision of advance information on future items listed (potentially also draft reports) to the Committee in advance will often depend upon a variety of factors including timing or feasibility, and ultimately any such request would rest with the relevant Cabinet Member to decide. However, the 2019 Protocol on Overview & Scrutiny and Cabinet Relations (part of the Hillingdon Constitution) does provide guidance to Cabinet Members to:

- Actively support the provision of relevant Council information and other requests from the Committee as part of their work programme.
- Where feasible, provide opportunities for committees to provide their input on forthcoming executive reports as set out in the Forward Plan to enable wider pre-decision scrutiny (in addition to those statutorily required to come before committees, *i.e. policy framework documents – see para. below*).

As mentioned above, there is both a constitutional and statutory requirement for Select Committees to provide comments on the Cabinet's draft budget and policy framework proposals after publication. These are automatically scheduled in advance to multi-year work programmes.

Therefore, in general, the Committee may consider the following actions on specific items listed on the Forward Plan:

	Committee action	When	How
1	To provide specific comments to be included in a future Cabinet or Cabinet Member report on matters within its remit.	<p>As part of its pre-decision scrutiny role, this would be where the Committee wishes to provide its influence and views on a particular matter within the formal report to the Cabinet or Cabinet Member before the decision is made.</p> <p>This would usually be where the Committee has previously considered a draft report or the topic in detail, or where it considers it has sufficient information already to provide relevant comments to the decision-maker.</p>	<p>These would go within the standard section in every Cabinet or Cabinet Member report called "Select Committee comments".</p> <p>The Cabinet or Cabinet Member would then consider these as part of any decision they make.</p>
2	To request further information on future reports listed under its remit.	<p>As part of its pre-decision scrutiny role, this would be where the Committee wishes to discover more about a matter within its remit that is listed on the Forward Plan.</p> <p>Whilst such advance information can be requested from officers, the Committee should note that information may or may not be available in advance due to various factors, including timescales or the status of the drafting of the report itself and the formulation of final recommendation(s). Ultimately, the provision of any information in advance would be a matter for the Cabinet Member to decide.</p>	<p>This would be considered at a subsequent Select Committee meeting. Alternatively, information could be circulated outside the meeting if reporting timescales require this.</p> <p>Upon the provision of any information, the Select Committee may then decide to provide specific comments (as per 1 above).</p>
3	To request the Cabinet Member considers providing a draft of the report, if feasible, for the Select Committee to consider prior to it being considered formally for decision.	<p>As part of its pre-decision scrutiny role, this would be where the Committee wishes to provide an early steer or help shape a future report to Cabinet, e.g., on a policy matter.</p> <p>Whilst not the default position, Select Committees do occasionally receive draft versions of Cabinet reports prior to their formal consideration. The provision of such draft reports in advance may depend upon different factors, e.g., the timings required for that decision. Ultimately any request to see a draft report early would need the approval of the relevant Cabinet Member.</p>	<p>Democratic Services would contact the relevant Cabinet Member and Officer upon any such request.</p> <p>If agreed, the draft report would be considered at a subsequent Select Committee meeting to provide views and feedback to officers before they finalise it for the Cabinet or Cabinet Member. An opportunity to provide specific comments (as per 1 above) is also possible.</p>
4	To identify a forthcoming report that may merit a post-decision review at a later Select Committee meeting	<p>As part of its post-decision scrutiny and broader reviewing role, this would be where the Select Committee may wish to monitor the implementation of a certain Cabinet or Cabinet Member decision listed/taken at a later stage, i.e., to review its effectiveness after a period of 6 months.</p> <p>The Committee should note that this is different to the use of the post-decision scrutiny 'call-in' power which seeks to ask the Cabinet or Cabinet Member to formally re-consider a decision up to 5 working days after the decision notice has been issued. This is undertaken via the new Scrutiny Call-in App members of the relevant Select Committee.</p>	<p>The Committee would add the matter to its multi-year work programme after a suitable time has elapsed upon the decision expected to be made by the Cabinet or Cabinet Member.</p> <p>Relevant service areas may be best to advise on the most appropriate time to review the matter once the decision is made.</p>

BACKGROUND PAPERS

- [Protocol on Overview & Scrutiny and Cabinet relations adopted by Council 12 September 2019](#)
- [Scrutiny Call-in App](#)

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Ref	Business Item	Further information	Ward(s)	NEW ITEM	Decision-Maker			Cabinet Member Lead & Officers				Status		
					CABINET meeting	Cabinet Member	Shareholder Committee	Full COUNCIL	Cabinet Member(s) Responsible	Relevant Select Committee	Report Author		Corporate Director Responsible	Public or Private (with reason)
MARCH 2026														
113	Rough Sleeper Prevention and Recovery Services	Cabinet will consider the renewal or extension of contracts in relation to rough sleeping and prevention and recovery services up to March 2027, supported by external funding.	N/A	NEW ITEM	19 March					Cllr Steve Tuckwell - Planning, Housing Growth	Residents' Services	Kellie Murphy	Dan Kennedy	Private (3)
116	Local Plan Scoping Consultation	Cabinet will consider approving the Local Plan Scoping Consultation for public consultation. The consultation is a statutory requirement in the new plan-making system. This is a 'call for views' consultation. No planning policies or proposals will be consulted upon. The consultation asks stakeholders what the plan should contain and sets out how the Council will engage with stakeholders for the Local Plan.	All	NEW ITEM	19 March					Cllr Steve Tuckwell - Planning, Housing Growth	Residents' Services	Gavin Polkinghorn	Dan Kennedy	Private (3)
115	Extension of the existing Dynamic Purchasing System (DPS) for Temporary Accommodation placements.	This report seeks Cabinet consideration to extend the existing Dynamic Purchasing System (DPS) for Temporary Accommodation placements for a further two years, in accordance with the original procurement terms approved by Cabinet in October 2021. In addition, the report will seek continuation of the existing delegated authority to officers to approve Temporary Accommodation placements, under the DPS to enable the Council to meet its statutory homelessness duties.	N/A	NEW ITEM	19 March					Cllr Steve Tuckwell - Planning, Housing Growth	Residents' Services	Lorrita Johnson / Adam Stephenson	Dan Kennedy	Private (3)
41	HRA Business Plan	The Housing Revenue Account (HRA) business plan will set out a long-term financial strategy for managing council housing stock, maintain homes, fund improvements, and support new housing opportunities and development.	All		19 March					Cllr Steve Tuckwell - Planning, Housing Growth / Cllr Jonathan Bianco - Corporate Services & Property	Residents' Services	Sam Strong	Dan Kennedy	Public

Ref	Business Item	Further information	Ward(s)	NEW ITEM	Decision-Maker				Cabinet Member Lead & Officers				Status
					CABINET meeting	Cabinet Member	Shareholder Committee	Full COUNCIL	Cabinet Member(s) Responsible	Relevant Select Committee	Report Author	Corporate Director Responsible	
112	Homelessness and Rough Sleeping Strategy	Cabinet will consider an updated Strategy, setting out the Council's long-term approach to preventing homelessness and reducing rough sleeping by improving access to housing, support services, and early intervention.	All		19 March				Cllr Steve Tuckwell - Planning, Housing Growth	Residents' Services	Debbie Weller	Dan Kennedy	Public
SI	Public Preview of matters to be considered in private	A report to Cabinet to provide maximum transparency to residents on the private and confidential matters to be considered later in Part 2 of the Cabinet meeting and agenda.	TBC		19 March				TBC	TBC	Democratic Services		Public
SI	Reports from Select Committees	Reports, findings and recommendations for consideration by the Cabinet, when referred from the appropriate Committee.	All		19 March				TBC	TBC	Democratic Services		Public

APRIL 2026

24	Temporary Accommodation Action Plan Monitoring	Cabinet will receive a quarterly update, or at a frequency as determined by the Cabinet Member, on progress on the delivery of the Temporary Accommodation Strategy and Action Plan presented to Cabinet in February 2025. This will be aligned with the Homelessness Prevention and Rough Sleeping Strategy and the Medium-Term Financial Strategy, which is to include details of actions taken to bring empty homes across the Borough back into occupation.	All		23 April				Cllr Steve Tuckwell - Planning, Housing Growth	Residents' Services	Debbie Weller	Dan Kennedy	Public
SI	Public Preview of matters to be considered in private	A report to Cabinet to provide maximum transparency to residents on the private and confidential matters to be considered later in Part 2 of the Cabinet meeting and agenda.	TBC		23 April				TBC	TBC	Democratic Services		Public
SI	Reports from Select Committees	Reports, findings and recommendations for consideration by the Cabinet, when referred from the appropriate Committee.	All		23 April				TBC	TBC	Democratic Services		Public

BOROUGH LOCAL ELECTIONS - 7 MAY 2026

MAY 2026

Ref	Business Item	Further information	Ward(s)	NEW ITEM	Decision-Maker				Cabinet Member Lead & Officers				Status
					CABINET meeting	Cabinet Member	Shareholder Committee	Full COUNCIL	Cabinet Member(s) Responsible	Relevant Select Committee	Report Author	Corporate Director Responsible	
SI	Corporate Disposals Programme 2026/27	As part of the Corporate Disposal programme, Cabinet will consider recommendations on property and land disposals for the financial year 2026-2027 and make the necessary decisions on sites to be declared surplus and provide delegated authority to enable the implementation of any decisions made.	Various		28 May				TBC	TBC	Andrew Low / Richard Mortimer	Dan Kennedy	Private (3)
SI	Minor Property Transactions	This monthly standing report to Cabinet covers operational property matters requiring approval. These may include: granting discounted leases to voluntary organisations; approving easements, wayleaves, or utility leases supporting capital projects; authorising academy school property issues; and agreeing leases for temporary housing or other service-related property needs.	All		28 May				TBC	TBC	Andrew Low	Dan Kennedy	Private (3)
SI	Reports from Select Committees	Reports, findings and recommendations for consideration by the Cabinet, when referred from the appropriate Committee.	Various		28 May				TBC	TBC	Democratic Services		Public
SI	Public Preview of matters to be considered in private	A report to Cabinet to provide maximum transparency to residents on the private and confidential matters to be considered later in Part 2 of the Cabinet meeting and agenda.	TBC		28 May				TBC	TBC	Democratic Services		Public
SI	Review of Council Constitution	The Council may reviews it's Constitution on a regular basis and may make changes at any Council meeting. The Annual Council meeting in May also provides an opportunity for such reviews at the start of the new Municipal Year, if any changes are required.	N/A					14 May (AGM)	N/A	N/A	Lloyd White		Public
SI	Annual Report of the Select Committees	This annual report sets out the important work undertaken by the Council's Select Committees during the previous Municipal Year. The Select Committee are responsible for monitoring and scrutinising council services and the Cabinet, holding to account external bodies and making recommendations on policy to the decision-making Cabinet.	N/A					14 May (AGM)	N/A	All	Mark Braddock		Public

JUNE 2026

Ref	Business Item	Further information	Ward(s)	NEW ITEM	Decision-Maker			Cabinet Member Lead & Officers				Status	
					CABINET meeting	Cabinet Member	Shareholder Committee	Full COUNCIL	Cabinet Member(s) Responsible	Relevant Select Committee	Report Author		Corporate Director Responsible
82b	West London Waste Plan (policy framework)	Following consultation, Cabinet will consider regulation 19 consultation to commence on the Joint Waste Plan. This Plan forms part of the Council's development plan documents, therefore it is policy framework.	N/A	NEW ITEM	25 June			26 November	TBC	TBC	Gavin Polkinghorn	Dan Kennedy	Public
45a	Housing Strategy (Policy Framework)	The Housing Strategy is a key policy framework document and provides the borough's strategic direction and priorities for housing services. Cabinet will approve commencement of formal consultation process. This is policy framework document under the Council's Constitution so it will be subject to statutory public consultation including by the relevant select committee, before further Cabinet, and ultimately full Council, consideration.	All		25 June			26 November	TBC	TBC	Debbie Weller	Dan Kennedy	Public
84b	Local Plan - Draft for consultation (policy framework)	To seek Cabinet agreement to undertake a public consultation on the Local Plan at Draft Plan stage in line with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations. This is policy framework document under the Council's Constitution so it will be subject to statutory public consultation including by the relevant select committee, before further Cabinet, and ultimately full Council, consideration.	All		25 June			Date TBC	TBC	TBC	Gavin Polkinghorn	Dan Kennedy	Public
26	Biannual Performance Report	Cabinet will receive its biannual report performance report for the current year, looking back on how the Council is delivering on key service metrics and the Council Strategy - and looking ahead at planned actions.	All		25 June				TBC	TBC	Ian Kavanagh	Matthew Wallbridge	Public
SI	Budget Outturn 2025/26	Cabinet will review the Council's budget outturn position for the previous financial year.	All		25 June				TBC	TBC	Andy Goodwin	Steve Muldoon	Public

Ref	Business Item	Further information	Ward(s)	NEW ITEM	Decision-Maker				Cabinet Member Lead & Officers				Status
					CABINET meeting	Cabinet Member	Shareholder Committee	Full COUNCIL	Cabinet Member(s) Responsible	Relevant Select Committee	Report Author	Corporate Director Responsible	
SI	Corporate Disposals Programme 2026/27	As part of the Corporate Disposal programme, Cabinet will consider recommendations on property and land disposals for the financial year and make the necessary decisions on sites to be declared surplus and provide delegated authority to enable the implementation of any decisions made.	Various		25 June				TBC	TBC	Andrew Low / Richard Mortimer	Dan Kennedy	Private (3)
SI	Minor Property Transactions	A regular report to Cabinet on minor property matters that may arise during the course of the year that require a Cabinet decision. These will relate to discounted leases to voluntary sector organisations and/or any easements, wayleaves and leases relating to utilities in order to support the Council's capital programmes and other such similar matters.	All		25 June				TBC	TBC	Andrew Low	Dan Kennedy	Private (3)
66	Reports from Select Committees	A report from the Select Committee into Homelessness and the customer journey	All		25 June				TBC	TBC	Democratic Services	N/A	Public
SI	Public Preview of matters to be considered in private	A report to Cabinet to provide maximum transparency to residents on the private matters to be considered later in Part 2 of the Cabinet meeting and agenda.	TBC		25 June				TBC	TBC	Democratic Services	TBC	Public
JULY 2026													
104	Landlord Service Annual Complaint & Service Improvement Report 2025/26	Cabinet will review the Landlord Service Annual Complaints and Service Improvement report before submission to the Housing Ombudsman.	N/A	NEW ITEM	23 July				TBC	TBC	Sam Strong / Debbie Weller	Dan Kennedy	Public
94	Hillingdon Parking Strategy	The Cabinet will consider a Parking Strategy following public consultation. A parking strategy will seek to establish a framework through which the Council will provide a fair, accessible, and sustainable parking service that supports residents, local businesses, and visitors, while contributing to Hillingdon's wider transport, economic, environmental, and land use goals.	All		23 July				TBC	TBC	Richard Webb	Dan Kennedy	Public

Ref	Business Item	Further information	Ward(s)	NEW ITEM	Decision-Maker				Cabinet Member Lead & Officers				Status
					CABINET meeting	Cabinet Member	Shareholder Committee	Full COUNCIL	Cabinet Member(s) Responsible	Relevant Select Committee	Report Author	Corporate Director Responsible	
24	Temporary Accommodation Action Plan Monitoring	Cabinet will receive a quarterly update, or at a frequency as determined by the Cabinet Member, on progress on the delivery of the Temporary Accommodation Strategy and Action Plan presented to Cabinet in February 2025. This will be aligned with the Homelessness Prevention and Rough Sleeping Strategy and the Medium-Term Financial Strategy, which is to include details of actions taken to bring empty homes across the Borough back into occupation.	All		23 July				TBC	TBC	Debbie Weller	Dan Kennedy	Public
SI	Corporate Disposals Programme 2026/27	As part of the Corporate Disposal programme, Cabinet will consider recommendations on property and land disposals for the financial year and make the necessary decisions on sites to be declared surplus and provide delegated authority to enable the implementation of any decisions made.	Various		23 July				TBC	TBC	Andrew Low / Richard Mortimer	Dan Kennedy	Private (3)
SI	Minor Property Transactions	This monthly standing report to Cabinet covers operational property matters requiring approval. These may include: granting discounted leases to voluntary organisations; approving easements, wayleaves, or utility leases supporting capital projects; authorising academy school property issues; and agreeing leases for temporary housing or other service-related property needs.	All		23 July				TBC	TBC	Andrew Low	Dan Kennedy	Private (3)
SI	Monthly Council Budget - monitoring report	The Cabinet receives a monthly report setting out in detail the Council's revenue and capital position.	All		23 July				TBC	TBC	Andy Goodwin	Steve Muldoon	Public
SI	Reports from Select Committees	Reports, findings and recommendations for consideration by the Cabinet, when referred from the appropriate Committee.	All		23 July				TBC	TBC	Democratic Services	N/A	Public
SI	Public Preview of matters to be considered in private	A report to Cabinet to provide maximum transparency to residents on the private matters to be considered later in Part 2 of the Cabinet meeting and agenda.	TBC		23 July				TBC	TBC	Democratic Services	TBC	Public

Schedule of Individual Cabinet Member Decisions that may be taken each month (standard items non key-decisions)

Ref	Business Item	Further information	Ward(s)	NEW ITEM	Decision-Maker				Cabinet Member Lead & Officers				Status
					CABINET meeting	Cabinet Member	Shareholder Committee	Full COUNCIL	Cabinet Member(s) Responsible	Relevant Select Committee	Report Author	Corporate Director Responsible	
SI	Urgent Cabinet-level decisions & interim decision-making (including emergency decisions)	The Leader of the Council has the necessary authority to make decisions that would otherwise be reserved to the Cabinet, in the absence of a Cabinet meeting or in urgent circumstances. Any such decisions will be published in the usual way and reported to a subsequent Cabinet meeting for ratification. The Leader may also take emergency decisions without notice, in particular in relation to the COVID-19 pandemic, which will be ratified at a later Cabinet meeting.	Various						Cllr Ian Edwards - Leader of the Council	TBC	TBC		Public / Private
SI	Release of Capital Funds	The release of all capital monies requires formal Member approval, unless otherwise determined either by the Cabinet or the Leader. Batches of monthly reports (as well as occasional individual reports) to determine the release of capital for any schemes already agreed in the capital budget and previously approved by Cabinet or Cabinet Members	TBC						Cllr Eddie Lavery - Finance & Transformation (in conjunction with relevant Cabinet Member)	All - TBC by decision made	various		Public but some Private (1,2,3)
SI	Petitions about matters under the control of the Cabinet	Cabinet Members will consider a number of petitions received by local residents and organisations and decide on future action. These will be arranged as Petition Hearings.	TBC						All	TBC	Democratic Services		Public
SI	To approve compensation payments	To approve compensation payments in relation to any complaint to the Council in excess of £1000.	n/a						All	TBC	various		Private (1,2,3)
SI	Acceptance of Tenders	To accept quotations, tenders, contract extensions and contract variations valued between £50k and £500k in their Portfolio Area where funding is previously included in Council budgets.	n/a						Cllr Ian Edwards - Leader of the Council OR Cllr Eddie Lavery - Finance & Transformation / in conjunction with relevant Cabinet Member	TBC	various		Private (3)

Ref	Business Item	Further information	Ward(s)	NEW ITEM	Decision-Maker			Cabinet Member Lead & Officers				Status	
					CABINET meeting	Cabinet Member	Shareholder Committee	Full COUNCIL	Cabinet Member(s) Responsible	Relevant Select Committee	Report Author		Corporate Director Responsible
SI	All Delegated Decisions by Cabinet to Cabinet Members, including tender and property decisions	Where previously delegated by Cabinet, to make any necessary decisions, accept tenders, bids and authorise property decisions / transactions in accordance with the Procurement and Contract Standing Orders.	TBC			Cabinet Member Decision - date TBC			All	TBC	various		Public / Private (1,2,3)
SI	Chrysalis Programme of Environmental Improvements	The Cabinet Member will be asked to consider the approval of projects.	Various			Cabinet Member Decision - date TBC			Cllr Wayne Bridges - Community & Environment	Residents' Services	Neil O'Connor		Public
SI	External funding bids	To authorise the making of bids for external funding where there is no requirement for a financial commitment from the Council.	n/a			Cabinet Member Decision - date TBC			All	TBC	various		Public
SI	Response to key consultations that may impact upon the Borough	A standard item to capture any emerging consultations from Government, the GLA or other public bodies and institutions that will impact upon the Borough. Where the deadline to respond cannot be met by the date of the Cabinet meeting, the Constitution allows the Cabinet Member to sign-off the response.	TBC			Cabinet Member Decision - date TBC			All	TBC	various		Public

SI = Standard Item that may be considered each month/regularly

The Cabinet's Forward Plan is an official document by the London Borough of Hillingdon, UK

WORK PROGRAMME

Committee name	Residents' Services Select Committee
Officer reporting	Liz Penny, Democratic Services Officer
Papers with report	Appendix A – Work Programme
Ward	All

HEADLINES

To enable the Committee to note future meeting dates and to forward plan its work for the current municipal year.

RECOMMENDATION:

That the Residents' Services Select Committee considers the Work Programme report and agrees any amendments.

SUPPORTING INFORMATION

- The Committee's meetings will start at 7pm and the witnesses attending each of the meetings may include representatives from external organisations, some of whom travel from outside of the Borough. Forthcoming meeting dates are as follows:

Meeting Date	Room
12 June 2025	CR6
15 July 2025	CR6
9 September 2025	CR5
6 November 2025	CR5
8 January 2026	CR5
18 February 2026	CR5
10 March 2026	CR5
22 April 2026	CR5

Site Visits

Members of the Residents' Services Select Committee have undertaken a number of site visits to include the CCTV room in the Civic Centre, Harlington Road Depot, Heathrow Imported Food Office, Hillingdon Fire Station, Botwell Leisure Centre, Breakspear Crematorium, the Recycling Centre at Edmonton, visits with the Traffic Wardens and the Noise Team, the Platinum Jubilee Leisure Centre works and Heathrow Skills Academy.

Implications on related Council policies

The role of the Select Committees is to make recommendations on service changes and improvements to the Cabinet, who are responsible for the Council's policy and direction.

How this report benefits Hillingdon residents

Select Committees directly engage residents in developing policy proposals and recommendations to Cabinet - and as such, Committees seek to improve the way the Council provides services to residents.

Financial Implications

None at this stage.

Legal Implications

None at this stage.

BACKGROUND PAPERS

Nil.

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