



HILLINGDON  
LONDON



# CABINET

## To all Members of the Cabinet:

**Date:** THURSDAY, 20  
NOVEMBER 2025

**Time:** 7.00 PM

**Venue:** COMMITTEE ROOM 6 -  
CIVIC CENTRE, HIGH  
STREET, UXBRIDGE UB8  
1UW

**Meeting  
Details:** The public and press are welcome  
to attend and observe the meeting.

For safety and accessibility, security measures will be conducted, including searches of individuals and their belongings. Attendees must also provide satisfactory proof of identity upon arrival. Refusal to comply with these requirements will result in non-admittance.

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Ian Edwards, Leader of the Council  
(Chair)

Jonathan Bianco, Deputy Leader of the  
Council & Cabinet Member for Corporate  
Services & Property (Vice-Chair)

Susan O'Brien, Cabinet Member for  
Children, Families & Education

Jane Palmer, Cabinet Member for Health  
& Social Care

Eddie Lavery, Cabinet Member for  
Finance & Transformation

Steve Tuckwell, Cabinet Member for  
Planning, Housing & Growth

**Published:**  
Wednesday, 12 November 2025

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**Putting our residents first**

Lloyd White  
Head of Democratic Services  
London Borough of Hillingdon,  
Phase II, Civic Centre, High Street, Uxbridge, UB8 1UW

# Useful information for residents and visitors

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# Notice

## **Notice of meeting and any private business**

The London Borough of Hillingdon is a modern, transparent Council and through effective Cabinet governance, it seeks to ensure the decisions it takes are done so in public as far as possible. Much of the business on the agenda for this Cabinet meeting will be open to residents, the wider public and media to attend. However, there will be some business to be considered that contains, for example, confidential, commercially sensitive or personal information. Such business is shown in Part 2 of the agenda and is considered in private. Further information on why this is the case can be sought from Democratic Services.

This is formal notice under The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 to confirm that the Cabinet meeting to be held on:

*20 November 2025 at 7pm in Committee Room 6, Civic Centre, Uxbridge*

will be held partly in private and that 28 clear days public notice of this meeting has been given. The reason for this is because the private (Part 2) reports listed on the agenda for the meeting will contain exempt information under Part 1 of Schedule 12A to the Local Government Act 1972 (as amended) and that the public interest in withholding the information outweighs the public interest in disclosing it. An online and a hard copy notice at the Civic Centre in Uxbridge indicates a number associated with each report with the reason why a particular decision will be taken in private under the categories set out below:

- (1) information relating to any individual
- (2) information which is likely to reveal the identity of an individual
- (3) information relating to the financial or business affairs of any particular person (including the authority holding that information)
- (4) information relating to any consultations or negotiations, or contemplated consultations or negotiations, in connection with any labour relations matter arising between the authority or a Minister of the Crown and employees of, or office holders under, the authority.
- (5) Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.
- (6) Information which reveals that the authority proposes (a) to give under any enactment a notice under or by virtue of which requirements are imposed on a person; or (b) to make an order or direction under any enactment.
- (7) Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.

## **Notice of any urgent business**

To ensure greater transparency in decision-making, 28 clear days public notice of the decisions to be made both in public and private has been given for these agenda items. Any exceptions to this rule are the urgent business items on the agenda marked \*. For such items it was impracticable to give sufficient notice for a variety of business and service reasons. The Chairman of the relevant Select Committee has been notified in writing about such urgent business.

## **Notice of any representations received**

No representations from the public have been received regarding this meeting.

## **Date notice issued and of agenda publication**

12 November 2025  
London Borough of Hillingdon

# Agenda

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*The reports in Part 2 of this agenda are not for publication because they involve the disclosure of information in accordance with Section 100(A) and Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended), in that they contain exempt information and that the public interest in withholding the information outweighs the public interest in disclosing it.*

- |           |  |           |
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## Minutes & Decisions

### **CABINET**

**Thursday, 23 October 2025**

**Meeting held at Committee Room 6 - Civic Centre,  
High Street, Uxbridge UB8 1UW**



**Decisions Published on: 24 October 2025**

**Decisions come into effect, where stated: 5pm, 31 October 2025**

#### **Cabinet Members Present:**

Ian Edwards (Chair)  
Jonathan Bianco (Vice-Chair)  
Martin Goddard  
Susan O'Brien  
Jane Palmer  
Eddie Lavery  
Steve Tuckwell

#### **Members also Present:**

Stuart Mathers  
Sital Punja  
Jan Sweeting  
Kamal Kaur  
Gursharan Mand

#### **1. APOLOGIES FOR ABSENCE**

All Cabinet Members were present.

#### **2. DECLARATIONS OF INTEREST IN MATTERS BEFORE THIS MEETING**

No interests were declared by Members present.

#### **3. TO APPROVE THE MINUTES OF THE LAST CABINET MEETING**

The minutes and decisions of the Cabinet meeting held on 18 September 2025 were agreed as a correct record.

#### **4. TO CONFIRM THAT THE ITEMS OF BUSINESS MARKED PART 1 WILL BE CONSIDERED IN PUBLIC AND THAT THE ITEMS OF BUSINESS MARKED PART 2 IN PRIVATE**

It was confirmed that items of business marked Part 1 would be considered in public and those marked Part 2 in private.

## **5. HOUSES OF MULTIPLE OCCUPATION: CONSULTATION ON ADDITIONAL LICENSING CONTROLS**

### **RESOLVED:**

#### **That:**

- 1) the draft Additional HMO Licensing Policy Appendix 1 and associated proposed licence conditions in Appendix 1a, be agreed for consultation;**
- 2) the draft Fees and Charges Schedule in Appendix 2 be agreed for consultation;**
- 3) it be noted the consultation period will start at 5pm on 31<sup>st</sup> October 2025 and end at midnight on 11<sup>th</sup> January 2026;**
- 4) the Consultation and Engagement Plan for the consultation in Appendix 3, also be noted.**

### **Reasons for decision**

The Cabinet Member for Planning, Housing & Growth provided an update on the proposed additional licensing policy for Houses in Multiple Occupation (HMOs), seeking Cabinet's approval to proceed with the public consultation. It was noted that unlicensed HMOs could pose risks to communities and that the Council aimed to gather comprehensive evidence before finalising any policy.

A draft policy had been prepared, outlining proposed conditions and fees, and would be subject to consultation from through to January 2026. The consultation would engage residents, landlords, associations and other stakeholders, with final proposals to be brought back to Cabinet in February 2026. The Cabinet Member emphasised the Council's commitment to resident safety, stronger communities and effective local leadership.

The Leader of the Council welcomed the update and expressed hope for a successful conclusion.

Cabinet agreed the draft policy, conditions and fees for public consultation.

### **Alternative options considered and rejected**

Cabinet could have decided to do nothing, but this would have failed to meet the Council's commitments and had no impact on private rented sector issues. Cabinet could have used existing powers, whilst viable, would not have effectively controlled HMO impacts. Additionally, Cabinet could have considered a proposal for a partial licensing policy but noted that concerns on this matter were found across all wards.

<b>Relevant Select Committee</b>	<b>Residents' Services</b>
<b>Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)</b>	Cabinet's decisions on this matter can be called in by a majority of the select committee by 5pm, Friday 31 October 2025. If not called-in by then, Cabinet's decisions can then be implemented.
<b>Officer(s) to action</b>	Stephanie Waterford, Michelle Greenidge



## **6. THE ANNUAL REPORT OF CHILD SAFEGUARDING ARRANGEMENTS**

### **RESOLVED:**

#### **That:**

- 1) the Annual Report 2024-25 and the assurance that the partnership continues to provide leadership and scrutiny of the safeguarding arrangements for Hillingdon residents, be noted;**
- 2) the way in which the partnership has responded to the challenges posed by changing local, national and international contexts, be noted and;**
- 3) the strategic priorities for safeguarding for 2025-26, be noted.**

### **Reasons for decision**

The Cabinet Member for Children, Families & Education presented the annual report of the Hillingdon Safeguarding Children's Partnership, outlining the work undertaken in 2024–2025 to support and protect children and families.

The report highlighted the increasing complexity of safeguarding needs and reaffirmed the partnership's vision for children to feel safe, healthy, and supported. The three statutory partners—the local authority, police, and Integrated Care Board—worked alongside other agencies to deliver priorities focused on contextual safeguarding, child sexual abuse, educational safeguarding, and transitional safeguarding.

For 2025–2026, the partnership aimed to strengthen multi-agency responses, embed transitional safeguarding approaches, address harm outside the home through the MAROTH framework, and promote the voice of children and young people. The work was aligned with the Joint Targeted Area Inspection framework, with efforts underway to improve data sharing and collaborative planning across services.

The Leader of the Council welcomed the report and particularly endorsed the comments made by the Independent Scrutineer, Alan Caton OBE, who praised the strength of the partnership, its openness to scrutiny and challenge, and its commitment to continuous improvement. The Leader described the partnership as one built on high support and high challenge, where difficult conversations were encouraged, and congratulated all involved for their work.

## Alternative options considered and rejected

None.

Relevant Select Committee	Children, Families & Education
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Not for call-in, as report was noted.
Officer(s) to action	Senay Nidai
Directorate	Children's Services
Classification	<b>Public</b> - <i>The report and any background papers relating to this decision by the Cabinet are available to view on the Council's website or by visiting the Civic Centre, Uxbridge</i>

## 7. THE ANNUAL REPORT OF ADULT SAFEGUARDING ARRANGEMENTS

### RESOLVED:

That:

- 1) the Annual Report 2024-25 and the assurance that the partnership continues to provide leadership and scrutiny of the safeguarding arrangements for Hillingdon residents, be noted;
- 2) the way in which the partnership has responded to the challenges posed by changing local, national and international contexts, be noted and;
- 3) the strategic priorities for safeguarding for 2025-26, be noted.

### Reasons for decision

The Cabinet Member for Health & Social Care informed Cabinet of the annual Safeguarding Adults report, which detailed the work of the Hillingdon Safeguarding Adults Board as part of the wider safeguarding partnership.

The report provided assurance that the partnership continued to offer strong leadership and scrutiny, and outlined strategic priorities for 2025–2026, including safeguarding adults with complex needs such as rough sleeping and substance abuse, improving engagement with carers, and enhancing collaboration across strategic partnerships, particularly in cases involving domestic abuse.

The report highlighted neglect and acts of omission as the most common safeguarding concerns, followed by financial, psychological, and discriminatory abuse, with eight cases related to modern slavery.

The Cabinet Member praised the training programme, which delivered over 2,400 sessions, and thanked the report authors and the independent scrutineer, Alan

Canton OBE, whose comments commended the partnership's strong leadership and commitment to improvement.

The Leader of the Council echoed this praise, noting the powerful case studies and the breadth of work undertaken to safeguard residents of all ages.

### Alternative options considered and rejected

None.

Relevant Select Committee	Health & Social Care
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Not for call-in, as report was noted.
Officer(s) to action	Suzi Gladish / Senay Nidai
Directorate	Adult Social Care & Health
Classification	<b>Public</b> - <i>The report and any background papers relating to this decision by the Cabinet are available to view on the Council's website or by visiting the Civic Centre, Uxbridge</i>

## 8. TEMPORARY ACCOMMODATION ACTION PLAN MONITORING

### RESOLVED:

**That the content of the quarterly update report be noted.**

### Reasons for decision

The Cabinet Member for Planning, Housing & Growth presented the second quarterly update on the delivery of the temporary accommodation strategy and action plan, originally approved in February 2025.

Progress was reported across all four objectives: managing demand, increasing move-on rates, reducing costs, and expanding housing supply. A reduction in new placements into temporary accommodation was noted, alongside strengthened prevention work and ongoing pressures from private landlord evictions and arrivals linked to Heathrow.

The Council was on track to meet its target of 350 private rented tenancies, supported by a new landlord forum and incentive package. Cost reductions were achieved through the rent cap initiative and the leasing of 87 homes at Frayswater Place. The acquisition programme for social housing was progressing ahead of schedule. However, the Cabinet Member highlighted the severe national funding shortfall, with Hillingdon facing acute pressures as a Port Authority. The Council's next priorities included increasing access to private rented homes, completing the next phase of rent cap reductions, and continuing acquisitions to meet targets by March 2026.

The Cabinet Member concluded by noting the progress made in reducing costs, improving prevention, and helping more families move into permanent homes. While the Council was delivering on its responsibilities, it was stressed that central Government must now step up and provide fair funding.

The Leader of the Council welcomed the report, praised the effective activity underway, and emphasised the need for fair government funding, particularly to address the unfunded burden from Heathrow-related demand.

### Alternative options considered and rejected

None.

Relevant Select Committee	Residents' Services
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Not for call-in, as report was noted.
Officer(s) to action	Debbie Weller
Directorate	Residents Services
Classification	<b>Public</b> - <i>The report and any background papers relating to this decision by the Cabinet are available to view on the Council's website or by visiting the Civic Centre, Uxbridge.</i>  <i>The Chair agreed the report relating to this matter as an late urgent item.</i>

## 9. POLICY FRAMEWORK: CONSULTATION ON THE COMMUNITY SAFETY STRATEGY

### RESOLVED:

**That the draft Hillingdon Community Safety Strategy 2025-2029 in Appendix 1 be agreed for consultation.**

### Reasons for decision

The Cabinet Member for Community & Environment introduced the draft Community Safety Strategy, which was due to go out for a six-week consultation before returning to Cabinet in January and being adopted by full Council in February 2026.

The strategy, led by the Council through the Safer Hillingdon Partnership, involved key agencies including the Police, Fire Brigade, probation services, and representatives from adult and children's services. The draft priorities included safer neighbourhoods, tackling violence against women and girls, addressing serious violence including knife crime, and safeguarding communities. These priorities were informed by statistical data and a strategic needs assessment.

The Leader of the Council welcomed the strategy and highlighted the successful campaign to prevent the closure of Hayes Police Station, describing it as a symbolic and practical win for community safety in the borough.

Cabinet agreed for the plan to go out for public consultation.

### **Alternative options considered and rejected**

None, as there was a statutory requirement to develop, consult and adopt a Community Safety Strategy for the area.

<b>Relevant Select Committee</b>	<b>Residents' Services</b>
<b>Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)</b>	Decision takes immediate effect. Not for call-in. This is a policy framework document and the decision to adopt is reserved to the full Council. The relevant select committee will be consulted prior to this.
<b>Officer(s) to action</b>	Richard Webb,
<b>Directorate</b>	Residents Services
<b>Classification</b>	<b>Public</b> - <i>The report and any background papers relating to this decision by the Cabinet are available to view on the Council's website or by visiting the Civic Centre, Uxbridge</i>

## **10. TRANSPORT FOR LONDON LOCAL IMPLEMENTATION PLAN - ANNUAL SPENDING SUBMISSION**

### **RESOLVED:**

**That;**

- 1) the proposed bid outlined in this report for funds from Transport for London (TfL) to implement the Council's Local Implementation Plan (LIP) for 2026/27, be approved in principle;**
- 2) authority be delegated to the Corporate Director of Residents Services, in consultation with the Cabinet Member for Planning, Housing and Growth, to agree any changes or additions prior to the submission deadline and to submit the Council's new three-year Local Implementation Plan Delivery Programme bid by the deadline.**

### **Reasons for decision**

The Cabinet Member for Planning, Housing & Growth introduced the proposed funding bid to Transport for London under the Local Implementation Plan for 2026–2027, seeking Cabinet approval and delegated authority for final submission by the 31 October deadline.

The bid aimed to secure significant external investment to improve transport across the borough, with a focus on safety and connectivity. Planned improvements

included safer walking and cycling routes, upgraded junctions and crossings, bus priority measures, and the borough-wide Safer Streets programme, starting in Uxbridge. The proposals built on existing transport and cycling strategies and came at no direct cost to the Council.

The Cabinet Member emphasised the benefits to residents, including safer journeys, cleaner air, and more sustainable travel options, and recommended approval of the bid.

### Alternative options considered and rejected

Cabinet could have authorised the final submission, but considered delegation would enable any minor changes to be made before the submission deadline.

Relevant Select Committee	Corporate Resources & Infrastructure
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Cabinet's decisions on this matter can be called in by a majority of the select committee by 5pm, Friday 31 October 2025. If not called-in by then, Cabinet's decisions can then be implemented.
Officer(s) to action	Sophie Wilmot
Directorate	Residents Services
Classification	<b>Public</b> - <i>The report and any background papers relating to this decision by the Cabinet are available to view on the Council's website or by visiting the Civic Centre, Uxbridge</i>

## 11. STRATEGIC CLIMATE ACTION PLAN - 2024/25 REVIEW

### RESOLVED:

**That the progress made in the Strategic Climate Action Plan Progress Report 2024-25, be noted.**

### Reasons for decision

The Cabinet Member for Community & Environment introduced the review of the Strategic Climate Action Plan, following the Council's declaration of a climate emergency in 2020. The report updated Cabinet on actions already taken and outlined new measures through to 2028. A 34% reduction in carbon emissions at the Civic Centre was noted, with ongoing work to monitor and reduce fleet emissions. Hillingdon was recognised as having the second largest tree canopy in London, with continued tree planting contributing to carbon sequestration. Natural flood mitigation measures had also been implemented in response to changing weather patterns, particularly increased rainfall intensity.

The Leader of the Council welcomed the report and expressed hope that the borough's green spaces and tree canopy would remain protected from the Mayor of London's expansion plans.

## Alternative options considered and rejected

None.

Relevant Select Committee	Residents' Services
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Not for call-in, as report was noted.
Officer(s) to action	Ian Thynne
Directorate	Residents Services
Classification	<b>Public</b> - <i>The report and any background papers relating to this decision by the Cabinet are available to view on the Council's website or by visiting the Civic Centre, Uxbridge</i>

## 12. BETTER CARE FUND SECTION 75 AGREEMENT

### RESOLVED:

That:

- 1) the London Borough of Hillingdon enter into an agreement with Northwest London Integrated Care Board (ICB) under section 75 of the National Health Service Act 2006 for the delivery of the Better Care Fund plan as described in the report from the 1st April 2025 to 31st March 2026 at a value of £74,160,937.
- 2) Authority be delegated to the Corporate Director, Adult Social Care and Health, to amend the terms of the agreement with Northwest London Integrated Care Board during 2025/26, in consultation with the Leader of the Council and the Cabinet Member for Health and Social Care.

### Reasons for decision

The Cabinet Member for Health & Social Care introduced the Better Care Fund Section 75 agreement with the North West London Integrated Care Board, which formalised the financial and partnership arrangements for pooled budgets under the national initiative first established in 2015. The agreement, commencing on 1 April 2025, aimed to improve care outcomes for older people, adults with long-term conditions, and individuals with learning disabilities or autism. It supported hospital discharge with appropriate equipment and care to enhance recovery and independence.

The Cabinet Member noted delays due to Integrated Care Board reorganisation and funding challenges but recommended approval of the agreement.

The Leader of the Council acknowledged the recurring, but improving, delays in such agreements and welcomed the growing collaboration between health services and



the Council, expressing optimism about the benefits of closer integration in future years.

### Alternative options considered and rejected

Cabinet had the option not to enter the agreement or not delegate authority to amend it in-year, but considered this would risks funding and the need for flexibility in responding to evolving health and care system demands.

Relevant Select Committee	Health & Social Care
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Cabinet's decisions on this matter can be called in by a majority of the select committee by 5pm, Friday 31 October 2025. If not called-in by then, Cabinet's decisions can then be implemented.
Officer(s) to action	Gary Collier
Directorate	Adult Social Care and Health
Classification	<b>Public</b> - <i>The report and any background papers relating to this decision by the Cabinet are available to view on the Council's website or by visiting the Civic Centre, Uxbridge</i>

## 13. MONTHLY COUNCIL BUDGET MONITORING REPORT

### RESOLVED:

That the Cabinet:

1. Note the budget monitoring position and treasury management update as at August 2025 (Month 5) as set out in Part A of the report, furthermore, noting the actions proposed by officers.
2. Approve the financial recommendations as set out below:
  - a. Approve the forward phasing of £24m of HRA Capital Programme General Contingency into 2025/26 and to vire this budget to the HRA Acquisitions Programme Budget.
  - b. Approve the transfer of £20m of capital budget relating to Housing Developments from the General Fund Capital Programme to the Acquisitions Programme within the HRA Capital Programme.
  - c. Approve the transfer of £8.0m from the 2025/26 HRA Capital Contingency budget to the HRA Capital Acquisitions budget.
  - d. Note and endorse the implementation of enhanced revenue spend controls across all service areas in order to reinforce financial discipline, ensure alignment with the Council's MTFS and mitigate further deterioration of the Council's financial position.



- e. **Note and endorse a comprehensive review of the General Fund Capital Programme to identify schemes where expenditure is not critical and may be delayed, reduced, or discontinued.**
- f. **Agree to increase the Council's No Recourse to Public Funds (NRPF) policy rates to match the Home Office asylum support rates, ensuring compliance with legal standards and safeguarding the welfare of families supported under Section 17 of the Children Act 1989.**

### **Reasons for decisions**

The Cabinet Member for Finance & Transformation presented the Month 5 Budget Monitoring Report, highlighting a projected adverse position of £30.2 million for the 2025–2026 financial year, driven by increased demand for statutory services including adult and children's social care, homelessness, and asylum support. Without exceptional financial support from central Government, reserves were forecast to be overdrawn by £24.9 million.

The Cabinet Member emphasised that these pressures stemmed largely from historic underfunding and the Council's commitment to maintaining low Council Tax and charges. Additional funding was being sought to address costs linked to asylum seekers arriving via Heathrow. Savings of £38.8 million were projected, with the majority on track for delivery.

The Housing Revenue Account remained balanced, despite variances in rental income and operating costs, and the acquisition of housing stock was exceeding expectations.

The Dedicated Schools Grant cumulative deficit to be carried forward was projected at £78.4 million, though recent improvements had been acknowledged in a letter from the Department for Education.

The Cabinet Member also recommended capital budget adjustments to support housing acquisitions.

The Leader of the Council acknowledged the financial pressures facing local authorities and welcomed the anticipated fair funding formula, stressing the need for it to address the unique burdens faced by Hillingdon.

### **Alternative options considered and rejected**

None

<b>Relevant Select Committee    Corporate Resources &amp; Infrastructure</b>	
<b>Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)</b>	Cabinet's decisions on this matter (2 a-f) can be called in by a majority of the select committee by 5pm, Friday 31 October 2025. If not called-in by then, Cabinet's decisions can then be implemented.
<b>Officer(s) to action</b>	Steve Muldoon / Andy Goodwin
<b>Directorate</b>	Finance

<b>Classification</b>	<b>Public</b> - <i>The report and any background papers relating to this decision by the Cabinet are available to view on the Council's website or by visiting the Civic Centre, Uxbridge</i>
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#### 14. PUBLIC PREVIEW OF CONFIDENTIAL REPORTS

##### RESOLVED:

That Cabinet note the reports to be considered later in private and Part 2 of the Cabinet agenda and comment on them as appropriate for public information purposes.

##### Reasons for decision

The Leader of the Council introduced the public preview report outlining items to be considered in private later in the meeting, with one additional private report tabled at short notice.

##### Alternative options considered and rejected

As set out in the public Cabinet report and also within the private report.

<b>Relevant Select Committee</b>	N/A
<b>Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)</b>	This matter is not for call-in, as noting only.
<b>Officer(s) to action</b>	Mark Braddock
<b>Directorate</b>	Corporate Services
<b>Classification</b>	<b>Public</b> - <i>The report and any background papers relating to this decision by the Cabinet are available to view on the Council's website or by visiting the Civic Centre, Uxbridge.</i>

#### 15. WINDOWS RENEWALS CONTRACT

##### RESOLVED:

That the following tenders for the Planned Windows Renewals Framework be accepted:

- 1) Lot 1 (North) – EVANDER GLAZING & LOCKS LIMITED for the provision of Windows Renewals Programme – AREA NORTH to the London Borough of Hillingdon for a 3+2 YEAR period at the potential estimated value of £2,356,672.
- 2) Lot 2 (Central) - EVANDER GLAZING & LOCKS LIMITED for the provision of Windows Renewals Programme – AREA CENTRAL to the

London Borough of Hillingdon for a 3+2 YEAR period at the potential estimated value of £7,804,968.

- 3) Lot 3 (South) – SOVEREIGN GROUP LIMITED for the provision of Windows Renewals Programme – AREA SOUTH to the London Borough of Hillingdon for a 3+2 YEAR period at the potential estimated value of £10,327,139.

#### Reasons for decision

The Cabinet Member for Corporate Services & Property introduced a report and recommendations, which Cabinet agreed, to accept tenders for the Replacement Framework of PVCu Double Glazed Windows to housing properties over a 5-year period. The Cabinet Member noted how this significant investment would improve heating and conditions in council housing properties.

#### Alternative options considered and rejected

Cabinet could have considered ad-hoc contracts but discounted this for operational reasons.

Relevant Select Committee	Corporate Resources and Infrastructure
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Cabinet's decisions on this matter can be called in by a majority of the select committee by 5pm, Friday 31 October 2025. If not called-in by then, Cabinet's decisions can then be implemented.
Officer(s) to action	Merrick Knight
Directorate	Residents Services
Classification	<b>Private</b> - <i>Whilst the Cabinet's decisions above are always made public, the officer report relating to this matter is not because it was considered in the private part of the meeting and contained information relating to the financial or business affairs of any particular person (including the Authority holding that information) and the public interest in withholding the information outweighed the public interest in disclosing it in accordance with Section 100(A) and paragraph 3 of Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended).</i>

#### 16. PROVISION OF VETERINARY SERVICES AT THE IMPORTED FOOD OFFICE

##### RESOLVED:

##### That:

- 1) the tender from Senlac Associates for the provision of veterinary services to the London Borough of Hillingdon Imported Food Office for a three-year period from 1 April 2026 to 31 March 2029 and at the estimated value of £1,861,947, be accepted.

- 2) Furthermore, it is agreed this includes the provision to extend the contract for a two-year period (five years in total), delegating approval of any extension to the Leader of the Council and the Cabinet Member for Community and Environment, in consultation with the Corporate Director of Residents Services which would be at a total contract value of £3,166,138 over the full five years.

### Reasons for decision

The Cabinet Member for Community & Environment introduced a report and recommendations, which Cabinet agreed, to accept a tender for providing veterinary services at the Imported Food Office, Heathrow. The Leader of the Council noted how this contract would be fully funded [via fees and charges].

### Alternative options considered and rejected

Cabinet could have recruited Official Veterinarians directly but discarded this on recruitment issue grounds.

Relevant Select Committee	Residents' Services
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Cabinet's decisions on this matter can be called in by a majority of the select committee by 5pm, Friday 31 October 2025. If not called-in by then, Cabinet's decisions can then be implemented.
Officer(s) to action	Samantha Doherty
Directorate	Residents Services
Classification	<b>Private</b> - <i>Whilst the Cabinet's decisions above are always made public, the officer report relating to this matter is not because it was considered in the private part of the meeting and contained information relating to the financial or business affairs of any particular person (including the Authority holding that information) and the public interest in withholding the information outweighed the public interest in disclosing it in accordance with Section 100(A) and paragraph 3 of Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended).</i>

## 17. DRAINAGE AND WATER MAIN REPAIRS SERVICE CONTRACT

### RESOLVED:

That the 2-year extension of the existing contract with CCR Property Services Ltd for the provision of reactive drainage and water main repairs throughout the Borough from 1<sup>st</sup> February 2026 until 31<sup>st</sup> January 2028, be approved.

## Reasons for decision

The Cabinet Member for Corporate Services & Property introduced a report and recommendations, which Cabinet agreed, to extend an existing contract to provide reactive drainage and water main repairs across the borough's social housing properties.

## Alternative options considered and rejected

Cabinet could have considered ad-hoc quotations, or retendering the contract, but considered these to be inefficient and would have resulted in higher costs.

Relevant Select Committee	Corporate Resources and Infrastructure
<b>Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)</b>	Cabinet's decisions on this matter can be called in by a majority of the select committee by 5pm, Friday 31 October 2025. If not called-in by then, Cabinet's decisions can then be implemented.
<b>Officer(s) to action</b>	Liam Bentley
<b>Directorate</b>	Residents Services
<b>Classification</b>	<b>Private</b> - <i>Whilst the Cabinet's decisions above are always made public, the officer report relating to this matter is not because it was considered in the private part of the meeting and contained information relating to the financial or business affairs of any particular person (including the Authority holding that information) and the public interest in withholding the information outweighed the public interest in disclosing it in accordance with Section 100(A) and paragraph 3 of Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended).</i>

## 18. SUPPORTED LIVING AND CARE & WELLBEING SERVICES

### RESOLVED:

That the existing contracts for the provision of Care and Wellbeing services for people with mental health needs and people with learning disabilities and/or autism with the providers be extended at the costs shown below:

1. Extend the Contract with Ability Housing Association for one year and 4 months from 1<sup>st</sup> December 2025 to 31<sup>st</sup> March 2027 at the value of £2,462,743.55
2. Extend the two service contracts with CCS Homecare Services for a period of one year from 1<sup>st</sup> September 2026 (one of the contracts is from 2<sup>nd</sup> September 2026) to 1<sup>st</sup> September 2027 at the value of £7,902,204.94 in total.
3. Extend the services with Support for Living for a period of 12 months from 28<sup>th</sup> September 2026 to 28<sup>th</sup> September 2027 at the value of £2,668,996.55.

## Reasons for decision

The Cabinet Member for Health & Social Care introduced a report and recommendations, which Cabinet agreed, to extend four existing contracts, with three providers, for the provision of care and wellbeing services to people with learning disabilities and/or autism and/or people with mental health needs. The Cabinet Member informed Cabinet of new legislation coming into force requiring such services to be reviewed in the future.

## Alternative options considered and rejected

None, given emerging statutory implications.

Relevant Select Committee	Health and Social Care
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Cabinet's decisions on this matter can be called in by a majority of the select committee by 5pm, Friday 31 October 2025. If not called-in by then, Cabinet's decisions can then be implemented.
Officer(s) to action	Graham Puckering / Sally Offin
Directorate	Adult Social Care & Health / Corporate Services
Classification	<b>Private</b> - <i>Whilst the Cabinet's decisions above are always made public, the officer report relating to this matter is not because it was considered in the private part of the meeting and contained information relating to the financial or business affairs of any particular person (including the Authority holding that information) and the public interest in withholding the information outweighed the public interest in disclosing it in accordance with Section 100(A) and paragraph 3 of Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended).</i>

## 19. RECRUITMENT AGENCY SERVICES REVIEW

### RESOLVED:

That:

- 1) the direct award from Pertemps Recruitment Partnership Limited for the provision of Temporary Recruitment Services as a Managed Services Provider for Hillingdon Council Contingent Labour via the ESPO MSTAR4 Framework to the London Borough of Hillingdon for a four-year period provisionally from 6th April 2026 to 5th April 2030 at a maximum value of up to £120 million (£30 million annually) based on current levels of temporary workforce usage, be accepted.
- 2) Furthermore, it is agreed that this includes the provision to extend the contract for a one-year period, delegating approval of any extension to



**the Leader of the Council, in consultation with the Cabinet Member for Corporate Services and Property and the Chief Operating Officer.**

### **Reasons for decision**

The Cabinet Member for Corporate Services & Property introduced a report and recommendations, which Cabinet agreed, to award a contract for a Managed Services Provider for Contingent Labour to the Council for its agency staff. The Cabinet Member advised how this was a significant contract in value, and one that was vital for the Council to continue its delivery of front-line services.

### **Alternative options considered and rejected**

Cabinet considered a range of other procurement options, as set out in the confidential report.

<b>Relevant Select Committee Corporate Resources and Infrastructure</b>	
<b>Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)</b>	Cabinet's decisions on this matter can be called in by a majority of the select committee by 5pm, Friday 31 October 2025. If not called-in by then, Cabinet's decisions can then be implemented.
<b>Officer(s) to action</b>	Stephen Ball
<b>Directorate</b>	Corporate Services
<b>Classification</b>	<b>Private</b> - <i>Whilst the Cabinet's decisions above are always made public, the officer report relating to this matter is not because it was considered in the private part of the meeting and contained information relating to the financial or business affairs of any particular person (including the Authority holding that information) and the public interest in withholding the information outweighed the public interest in disclosing it in accordance with Section 100(A) and paragraph 3 of Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended).</i>

## **20. SOCIAL CARE CATERING SERVICES**

### **RESOLVED:**

**That:**

- 1) the tender via an ESPO procurement framework from Caterplus Services Limited for the provision of Catering Services at two of the London Borough of Hillingdon's Extra Care services at a total cost of £1,867,916 for a four-year period from 15<sup>th</sup> January 2026, with the option to extend for a further 3 years at a minimum cost of £1,400,937 (£466,979 per annum), be accepted;**

- 2) the short-term extension of the existing contract for the provision of catering services from Caterplus Services Limited from 23<sup>rd</sup> September 2025 until 14<sup>th</sup> January 2026 at a cost of £155,800, be agreed.

### Reasons for decision

The Cabinet Member for Health & Social Care introduced a report and recommendations, which Cabinet agreed, to award, following competitive tender, a contract for catering services at two of Hillingdon's Extra Care schemes - Grassy Meadow Court and Park View Court. The Cabinet Member noted the short transitional extension required to the current contract and advised Cabinet that in respect of the new contract, resident user feedback would be integral to service delivery.

### Alternative options considered and rejected

Alternative procurement options considered were set out in the confidential report.

Relevant Select Committee	Health and Social Care
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Cabinet's decisions on this matter can be called in by a majority of the select committee by 5pm, Friday 31 October 2025. If not called-in by then, Cabinet's decisions can then be implemented.
Officer(s) to action	Tanya Bedoyian
Directorate	Adult Social Care & Health
Classification	<b>Private</b> - <i>Whilst the Cabinet's decisions above are always made public, the officer report relating to this matter is not because it was considered in the private part of the meeting and contained information relating to the financial or business affairs of any particular person (including the Authority holding that information) and the public interest in withholding the information outweighed the public interest in disclosing it in accordance with Section 100(A) and paragraph 3 of Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended).</i>

## 21. MINOR PROPERTY TRANSACTIONS - ELECTRICITY SUBSTATION LEASE, OTTERFIELD ROAD HOUSING PROJECT

### RESOLVED:

That the negotiated rent set out in the report, and the grant of a 99-year lease at a peppercorn rent to Scottish and Southern Electricity Networks to supply electricity to the new Otterfield Road Housing Development in Yiewsley, be approved.



## Reasons for decision

The Cabinet Member for Corporate Services & Property introduced a report and recommendations, which Cabinet agreed, to grant a long lease for a new substation to supply electricity to the new Otterfield Road Housing Development in Yiewsley.

## Alternative options considered and rejected

None.

Relevant Select Committee	Corporate Resources & Infrastructure
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Cabinet's decisions on this matter can be called in by a majority of the select committee by 5pm, Friday 31 October 2025. If not called-in by then, Cabinet's decisions can then be implemented.
Officer(s) to action	Jacob Davis
Directorate	Residents Services
Classification	<b>Private</b> - <i>Whilst the Cabinet's decisions above are always made public, the officer report relating to this matter is not because it was considered in the private part of the meeting and contained information relating to the financial or business affairs of any particular person (including the Authority holding that information) and the public interest in withholding the information outweighed the public interest in disclosing it in accordance with Section 100(A) and paragraph 3 of Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended).</i>

## 22. INCREASING LOCAL CARE PROVISION & DISPOSAL OF LAND AT THE CIVIC CENTRE

### RESOLVED:

That:

- 1) The project to increase local care provision and create a new Care Facility Development in Uxbridge, as set out in this report, be supported;
- 2) In order to progress this development opportunity, The Civic Centre Car Park, Cricket Field Road, Uxbridge, be declared surplus to requirements (the property as shown edged red on the plan at Appendix 1);
- 3) The sale of the freehold interest of the Site to the proposed purchaser, on the terms and conditions as detailed in this report, be approved;
- 4) It be noted the development will be subject to planning consent; rescinding of a Traffic Management Order and a change to private parking lease arrangements, as set out in the report;

- 5) Subject to the above, the intention for The Hillingdon Care Company (THCC) to enter into the lease-back of the development once completed, be noted;
- 6) The Corporate Director of Residents Services, in consultation with the Cabinet Member for Corporate Services & Property and the Corporate Director of Finance (s151 Officer), be given delegated authority for all further necessary decisions required including those in respect of progressing the disposal, sale, leases and any future property arrangements in respect of the site on behalf of the Council;
- 7) The Corporate Director of Adult Social Care & Health, in consultation with the Cabinet Member for Health & Social Care, be given delegated authority for all necessary future decisions required in respect of related care and local service provision on behalf of the Council;
- 8) Consideration of shareholder matters in relation to The Hillingdon Care Company be delegated to the Shareholder Committee (a sub-committee of the Cabinet) established in 2018 and that Councillor Jane Palmer be appointed to the Committee.

### Reasons for decision

The Cabinet Member for Corporate Services & Property introduced a report and recommendations, which Cabinet agreed, to dispose of the Civic Centre Car Park site in Uxbridge to facilitate a major new development project to increase dementia nursing care provision in the Borough. This would increase the number of local care beds, reducing reliance on costly private provision in a way that is more sustainable and cost-effective over time.

It was further noted the project would align with NHS plans and the early discharge of patients from hospital, and that the intention of such care provision was for it to be provided by the Council's new care company.

### Alternative options considered and rejected

Cabinet could have decided to keep the status quo or use the site for alternative use, which would have impacted on the accessibility of, and cost, of nursing dementia beds well into the future.

Relevant Select Committee	Health & Social Care
<b>Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)</b> <b>Officer(s) to action</b> <b>Directorate</b> <b>Classification</b>	<p>Cabinet's decisions on this matter can be called in by a majority of the select committee by 5pm, Friday 31 October 2025. If not called-in by then, Cabinet's decisions can then be implemented.</p> <p>Sandra Taylor &amp; Jan Major / Andrew Low</p> <p>Adult Social Care &amp; Health / Residents Services</p> <p><b>Private</b> - <i>Whilst the Cabinet's decisions above are always made public, the officer report relating to this matter is not because it was considered in the private part of the meeting and contained information relating to the financial or business affairs of any particular person (including the Authority holding that</i></p>

information) and the public interest in withholding the information outweighed the public interest in disclosing it in accordance with Section 100(A) and paragraph 3 of Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended).

**Urgency provisions** – The Chair agreed the report relating to this decision as an urgent item. This decision was taken under special urgency provisions in accordance with the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012.

## 23. ANY OTHER ITEMS THE CHAIRMAN AGREES ARE RELEVANT OR URGENT

Item 22 on the agenda was taken as urgent business. There were no further items. The meeting closed at 7.44pm

Internal Use only*	Implementation of decisions & scrutiny call-in
<b>When can these decisions be implemented by officers?</b>	<p>Officers can implement Cabinet's decisions in these minutes only from the expiry of the scrutiny call-in period, unless otherwise stated in the minutes above, which is:</p> <p><b>5pm, Friday 31 October 2025</b></p> <p>However, this is subject to the decision not being called in by Councillors on the relevant Select Committee. Upon receipt of a valid call-in request, Democratic Services will immediately advise the relevant officer(s) and the Cabinet decision must then be put on hold.</p>
<b>Councillor scrutiny call-in of these decisions</b>	<p>Councillors on the relevant Select Committee shown in these minutes for the relevant decision made may request to call-in that decision. The call-in request must be before the expiry of the scrutiny call-in period above.</p> <p>Councillors should use the Scrutiny Call-in App (link below) on their devices to initiate any call-in request. Further advice can be sought from Democratic Services if required: <a href="#">Scrutiny Call-In - Power Apps</a> (secure)</p>
<b>Notice</b>	<p>These decisions have been taken under The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012.</p> <p>This Cabinet meeting was also broadcast live on the Council's YouTube channel <a href="#">here</a> for wider resident engagement.</p>

Please note that these minutes and decisions are the definitive record of proceedings by the Council of this meeting.

If you would like further information about the decisions of the Cabinet, please contact the Council below:

[democratic@hillingdon.gov.uk](mailto:democratic@hillingdon.gov.uk)

Democratic Services: 01895 250636

Media enquiries: 01895 250403

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## REPORT FROM THE HEALTH & SOCIAL CARE SELECT COMMITTEE: GP COVERAGE IN HILLINGDON

<b>Cabinet Member &amp; Portfolio</b>	Councillor Jane Palmer, Cabinet Member for Health and Social Care
<b>Responsible Officer</b>	Sandra Taylor. Corporate Director of Adult Social Care and Health
<b>Report Author &amp; Directorate</b>	Nikki O'Halloran, Chief Executive's Office
<b>Papers with report</b>	None.

### HEADLINES

<b>Summary</b>	<p>At its meeting on 19 June 2025, the Health and Social Care Select Committee confirmed that it would undertake a single meeting review of General Practitioner (GP) coverage in Hillingdon. The review aimed to consider the number and geographical location of GPs in the Borough as well as the adequacy of the provision in serving the local population now and into the future.</p> <p>The report highlights the challenges faced by GP practices amid population growth and evolving healthcare demands, and outlines recommendations to improve service delivery and patient experience. The recommendations are based around meeting future demand, the expansion of the champions role, awareness raising, streamlining IT systems, improving online bookings and equality.</p>
<b>Putting our Residents First</b>  <b>Delivering on the Council Strategy 2022-2026</b>	<p>This report supports our ambition for residents of: Live active and healthy lives</p> <p>This report supports our commitments to residents of: Thriving, Healthy Households</p> <p>Joint Health &amp; Wellbeing Strategy</p>
<b>Financial Cost</b>	There is no direct financial cost to the Council associated with the recommendations in this report.
<b>Select Committee</b>	Health and Social Care Select Committee
<b>Ward(s)</b>	All

## RECOMMENDATIONS

That the insight and findings of the Health and Social Care Select Committee be welcomed and that:

1. officers work with partners to identify where GP surgeries are likely to be needed by 2035;
2. The Health and Wellbeing Board partners be asked to:
  - a. investigate a reduction in the complexity and quantity of data governance and IT systems currently being used in Hillingdon to enable patient data to be easily passed between professionals;
  - b. subject to the outcome of the pilot, expand the provision of champions to other health related issues;
  - c. increase awareness that the nature of community care is changing; and
3. The Confederation Hillingdon CIC be asked to:
  - a. investigate the possibility of increasing patients' use of online bookings systems, including being able to specify convenient call back times; and
  - b. ensure equality with regard to the ability to request to be seen by the same sex medical professionals at GP surgeries; and
4. The Health and Social Care Select Committee be provided with an update by March 2027 on any progress made in progressing these recommendations alongside the implementation of the NHS 10 Year Health Plan and the development of neighbourhoods.

### Additional recommendation from the Cabinet Member for Health & Social Care

5. Actions to progress all the above recommendations from the Select Committee be regularly monitored at Health & Wellbeing Board meetings and added to its work programme.

### Reasons for recommendations

Health partners have provided the Health and Social Care Select Committee (and its predecessor, the External Services Select Committee) with regular updates on the challenges faced by GPs in Hillingdon. With population growth in the Borough expected to continue, it is important that action is taken to ensure that this does not compound the challenges already being faced by GPs. The Committee looked at the work that has already been undertaken in the Borough and identified possible further improvements. These recommendations have been formulated to improve organisational resilience in providing GP services in the Borough.

Should Cabinet agree the recommendations, it is proposed that the relevant Chief Officer (Chief Executive and/or Corporate Director of Adult Social Care and Health) raise the recommendations from the Committee with the organisations / bodies concerned, ensuring they are taken forward and monitored accordingly. This will be added to the work programme for the Health & Wellbeing Board to monitor all recommendations.



## Alternative options considered / risk management

Cabinet could choose to not approve or amend any of the recommendations.

## SUPPORTING INFORMATION

### Background

1. The system of GPs and primary care is the cornerstone of the NHS. They are often the first point of contact for anyone with a physical or mental health need and either treat patients or refer them on to the appropriate pathway for diagnosis and treatment. An NHS GP is a medical doctor who works in primary care and provides general healthcare services to patients within the NHS system. They are highly trained professionals who provide a broad range of services, from managing common illnesses to offering preventative care and coordinating more specialised treatments. At the end of September 2024, there were 38,421 FTE NHS GPs in England (according to data from NHS Digital).
2. NHS England has delegated its responsibilities for the direct commissioning of primary care services (primary medical, dental, ophthalmic and community pharmacy services) to Integrated Care Boards (ICBs). The responsibilities delegated are set out in the standard Delegation Agreement between NHS England and each ICB. This includes contractual management and supporting improvement and transformation of services<sup>1</sup>.
3. In 2018, the average number of patients per fully qualified GP was higher in North West London (NWL) (2,696) than the London (2,497) and England (2,255) averages (these figures do not include other practice staff). NHS Digital states that there are 1,081 fully qualified GPs and 234 GPs in training grades in NWL which is a reduction of 5.1% in fully qualified GPs and a 134% increase in GPs in training grades, giving an overall combined increase of 7.9%.
4. 42 of Hillingdon's 44 GP surgeries have been organised into six Primary Care Networks (PCNs) – there are no GPs in Ruislip Manor or Hillingdon West wards<sup>2</sup>. A PCN is a group of general practices and other health and care providers that come together to provide health and care services for their community. PCNs are a key aspect of the NHS Long Term Plan, allowing services to be developed locally in response to the needs of patients in their area.
5. In Hillingdon, GP hubs have been set up to support practices by providing same day appointments for patients who have an urgent need on the day. GP and ANP (Advanced Nurse Practitioner) appointments are available face-to-face and by telephone, depending on the patient's needs. GP practices may book patients into the hub if they need a same day appointment but the practice is unable to see them. Appointments are available for all ages but the hubs are not suitable for routine appointments (which should be booked with the patient's own GP).
6. The NHS 10 Year Health Plan outlines the strategic ambitions for the NHS in England and emphasises a shift towards a more integrated health system, focusing on prevention and

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<sup>1</sup> NHS England - <https://www.england.nhs.uk/commissioning/primary-care/>

<sup>2</sup> Draft Pharmaceutical Needs Assessment 2025 - [https://www.hillingdon.gov.uk/media/16706/Draft-PNA-2025/pdf/s8Hillingdon\\_DRAFT\\_PNA\\_2025.pdf?m=1750254962493](https://www.hillingdon.gov.uk/media/16706/Draft-PNA-2025/pdf/s8Hillingdon_DRAFT_PNA_2025.pdf?m=1750254962493)

early intervention. Hillingdon has been identified as a health integrator and it is anticipated that the Neighbourhood Plan will change the landscape of what is delivered outside of hospital. The Health and Social Care Select Committee will receive updates over time on the progress of how these developments have improved same day emergency care for all patients in the community by giving them equity in access.

## **The Health and Social Care Select Committee Review**

7. Having received regular updates from partners on GP services in the Borough, the Health and Social Care Select Committee met on 22 July 2025 to undertake a single meeting review of GP coverage in Hillingdon. The Committee was able to question and solicit evidence from the following witnesses:

- Sean Bidewell, Assistant Director – Integration & Delivery / Acting Joint Borough Director, North West London Integrated Care Board (NWL ICB)
- Carleen Duffy, Your Voice in Health and Social Care (Healthwatch)
- Edmund Jahn, Chief Executive Officer, The Confederation Hillingdon CIC
- Lisa Taylor, Managing Director, Healthwatch Hillingdon

8. The discussions held during the meeting highlighted a number of matters as set out below:

## **Future Demand**

9. Although there has been an increase in the overall number of GP appointments available, the feedback on patient experience is still not where partners would like it to be. In 2022/23, there were 1.7 million appointments with a 6% increase in 2023/24 and a 9% increase in 2024/25 (68% of these had been face-to-face, which was an increase on the previous year). There had also been an increase in the number of patients wanting a same day appointment (up from about 3k to 3½k). A lot of effort is being made by partners to try to improve this.
10. As the commissioner, the ICB is responsible for proactively deciding where and when additional GP capacity is needed and how this is done in practice. Given the increasing demand for GP appointments and the increasing average age of current GPs in Hillingdon, Members have concerns about the possibility that practices may close when the last GP in a practice retires. If no action is taken to ensure continuity, their list would need to be redistributed to other practices that are already dealing with longer-than-average patient lists.
11. Although a new GP surgery had been planned for inclusion in the St Andrews Park development, this had not happened and a large number of patients had had to join the Uxbridge practice list, making that one of the largest practices in the Borough and putting it under greater pressure. The Confederation had worked closely with the Council, NWL ICB and providers to put an integrated estates strategy in place. However, the development of general practice had not followed the plan very closely and there are gaps where some GP practices cater for four times as many patients for the same size practice as others. It had been hoped that the strategic plan would address these inconsistencies (for example, more GP capacity is needed in Yiewsley / West Drayton).
12. It is recognised that this is not an easy challenge to resolve and that, if a practice is needed, it will be referenced on the basis of the strategic plan. However, partners need to look at

predicting where the increasing population within Hillingdon will settle and where new major developments are likely to arise. Insofar as GP premises are concerned, although the current commissioners have not had it in their gift over the last ten years, they now have a reference document / plan.

13. Closer working relations have also developed between the Council and health partners so there is the possibility of sharing estate as the local authority has fewer restrictions (freeing up capital allocation is a Government decision and is hampered by significant restrictions). Although not in complete control, it is hoped that place partners will be able to put pressure on the centre by identifying where future GP capacity will need to be located.

## IT Systems

14. There had been some confusion about how patients from different practices are able to access the same services (for example, dressings) and where they are provided, particularly if the patient is unable to use / access IT. Healthcare is complex and staff will often try to deal with this complexity behind the scenes, but this doesn't always work. There are currently at least five patient digital systems in use by General Practice in Hillingdon that patients needed to interact with for different things (this should probably be a maximum of two). The computer systems tend to be siloed, and patients often have to move from one system to another providing the same information multiple times.
15. Although it seems logical that the NHS should be able to work as a single team without the patient having to intervene, the data governance needs to be sorted out to enable this to happen. Members have been advised that this challenge is bigger than NWL ICB but that, locally, work is being undertaken to enable systems to talk to each other through Whole Systems Integrated Care (WSIC) dashboards which provide a linked integrated summary of patient's health and social care. This information could be used to case find and case manage patients who require more targeted and proactive care.
16. This issue is regularly brought to Members attention and there are continuing concerns that residents get lost in the system between services. With regard to the communication with GPs in relation to actions taken by other clinicians, the last four years have seen better cooperation across practices and networks, and staff have been collaborating more than ever. First contact physiotherapists have been employed in general practice with another tier in CNWL (MSK) and another at the hospital. However, these siloes have still not been completely joined together and patients might be asked to complete similar forms for each of the services which ask for very similar information. Ideally, as part of the 3-5 year plan being developed across and between local NHS providers (including GPs), there will be integrated physiotherapy teams collocated in each of the three Hubs.
17. With the increasing integration of services, it is becoming even more important to ensure that the patients' journey around the NHS is as seamless and smooth as possible, with as little repetition as is necessary. This means reducing the number of systems, eradicating the duplication of information and minimising effort on the part of the patient as well as partners.

## Champions

18. GPs are, by definition, general practitioners and are therefore not expert in everything health related. Consideration is regularly given to potential additional services that could be explored and implemented that would take the pressure off GPs. One such initiative is the creation of a Children and Young People's Champion role as a one-year pilot in one of the PCNs. The aim of this role is to alleviate the impact of mental health presentations on GPs and get young people and their families to the right support as quickly as possible (there is also a need to reduce the reliance on CAMHS by diverting to other services that are available and more appropriate). There are also plans to introduce additional roles such as practice nurses in some PCNs.
19. As the neighbourhood population needs are analysed, action will be needed to ensure that services are tailored to meet those needs. Where patients need detailed and personalised support (and this is not available from GPs), a knowledgeable champion would be useful to help guide them. This is especially true for young people's mental health, as the Committee knows from its report on this subject. However, it is suggested that, subject to the outcome of the pilot, consideration be given to introducing champion roles for other issues that would benefit a large number of patients, for example, weight loss.

## Awareness Raising

20. The way that health services are being delivered is changing. The Integrated Neighbourhood Teams are working to bring care closer to patients (including the PCNs) and core services (such as community nursing, musculoskeletal (MSK), adult social care, third sector and acute services). The Paediatric Clinics are a good example of this closer working in the community, which see teams from different organisations working together to improve patient experience and increase the number of patients seen. These clinics are being run from the Integrated Neighbourhood Hub and practices can book appointments at the Hub through patient contact with GPs. In future, neighbourhood working should enable patients to be booked in to see the community nurse and the community nurse should be able to book the patient in to see their GP.
21. Action is being taken to try to introduce more personalised care for patients with complex needs as well as dealing with same day access for other patients. The Pharmacy First consultation service enables patients to be referred into community pharmacy for a minor illness or an urgent repeat medicine supply. It enables community pharmacies to complete episodes of care for seven common conditions following defined clinical pathways (infected insect bites, impetigo, shingles, sinusitis, sore throat, urinary tract infections and ear infection) thus circumventing the need to see a GP.
22. Patients are often unaware of the role of each individual in a practice (or the role of other organisations) so will sometimes feel that they are not being seen by the most appropriate person. It seems that residents have not really engaged with how community health care is changing and still see the GP as being the answer to all of their issues (rather than an alternative, and more appropriate, pathway that could help them). More effort is needed to ensure that residents understand that community health care goes beyond the GP.

## Online Bookings

23. Healthwatch Hillingdon (HH) has recently published its report on GP access which highlights that the most common reason for residents to contact the organisation is in relation to getting a GP appointment. Seemingly, patient satisfaction has not improved even though there has been an increase in the total number of GP appointments available.
24. HH's research for the GP access report had started in 2024 but, as the survey had been put on hold whilst NWL ICB looked at same day access issues, discussions had been undertaken with groups such as carers, travellers and asylum seekers. Although 62% had been satisfied with GP contact there were concerns about issues such as booking appointments, telephone systems and continuity of care (these concerns were largely from people of working age).
25. The PATCHS system had been introduced to try to reduce phone waiting times by enabling patients to make an appointment request online. However, access times have been limited and there have been some technical issues resulting in practice staff having to call patients back. Furthermore, issues have been identified with regard to the telephone call back system (which is not currently working properly). Currently, the system does not allow patients to specify a convenient time for a call back so they might be busy and unable to answer their telephone when the call comes. Four Digital Transformation Managers have been looking at this type of issue to help simplify it from the patient perspective.
26. The Committee is mindful that it should be standard practice that residents can make all of their bookings online as this would alleviate pressure on the GP receptionists. Whilst the receptionist would still need to triage, this should be designed as simply as possible, for example, include a free text box (maximum 500 words) for the patient to explain what the appointment is for. This online triaging system would need to be simple because if it is too complicated, it will put people off.
27. To this end, the Committee would like The Confederation to investigate the ways in which patients' use of online bookings systems could be increased and include the ability for patients to specify convenient call back times.

## Equality

28. Over a number of years, there has been a shift to ensure that GP practices make every effort to meet patients' preferences to see the doctor, nurse or other healthcare professional when they need an appointment (although there are some occasions when this might not be possible). This has been publicised particularly for women who would like to see a female practitioner but greater effort is needed to publicise that this is also open to male patients who may want to see a male practitioner as some men may feel uncomfortable with a female.
29. It is suggested that future publicity about choices proactively advertises the ability for men to request a male practitioner.

Should Cabinet agree the recommendations contained within this report, it is proposed that the relevant Chief Officer (e.g. Chief Executive and / or the Corporate Director for Adult Social Care and Health) write to the organisations concerned to raise the recommendations from the

Committee, ensuring they are taken forward and monitored accordingly. This will be added to the work programme for the Health & Wellbeing Board to monitor all recommendations.

### **Financial Implications**

There are no direct financial implications arising from this report to the Council.

## **RESIDENT BENEFIT & CONSULTATION**

The recommendations in this report are designed with the purpose improving the resilience of GP practices in the Borough.

### **Consultation & Engagement carried out (or required)**

Witness testimony from the Committee as outlined in this report.

## **CORPORATE CONSIDERATIONS**

### **Corporate Finance**

Corporate Finance has reviewed this report, confirming that there are no direct financial implications associated with the recommendations outlined above.

### **Legal**

There are no legal implications arising from the recommendations in this report.

## **BACKGROUND PAPERS**

NIL

## WEST LONDON WASTE PLAN REGULATION 18 CONSULTATION

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

### HEADLINES

<b>Summary</b>	<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>
<b>Putting our Residents First</b>  <b>Delivering on the Council Strategy 2022-2026</b>	<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>
<b>Financial Cost</b>	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.
<b>Select Committee</b>	Resident's Services
<b>Ward(s)</b>	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

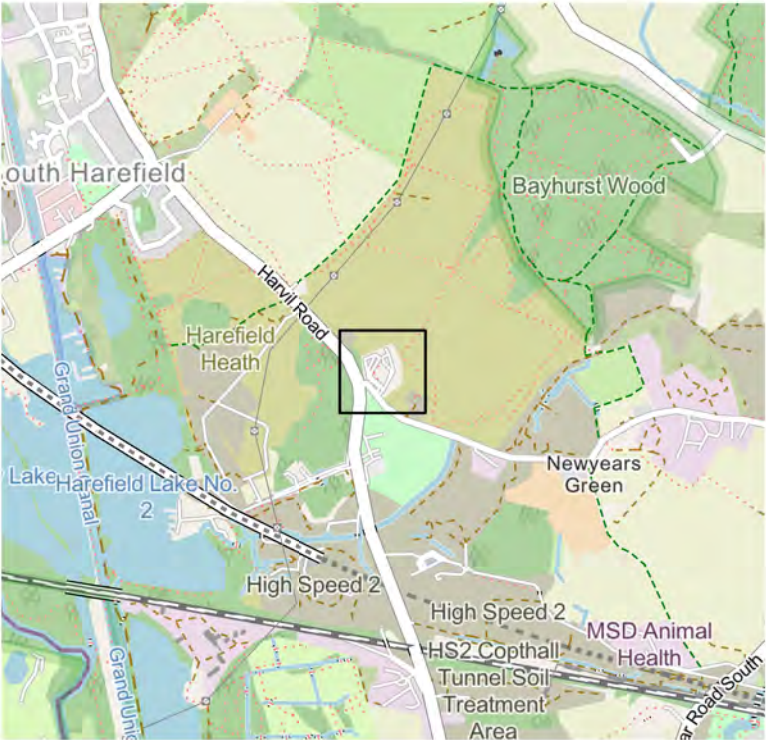
CLEUD – Certificate of Lawful Existing Use or Development

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

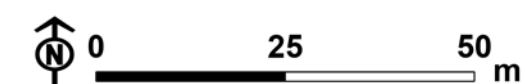
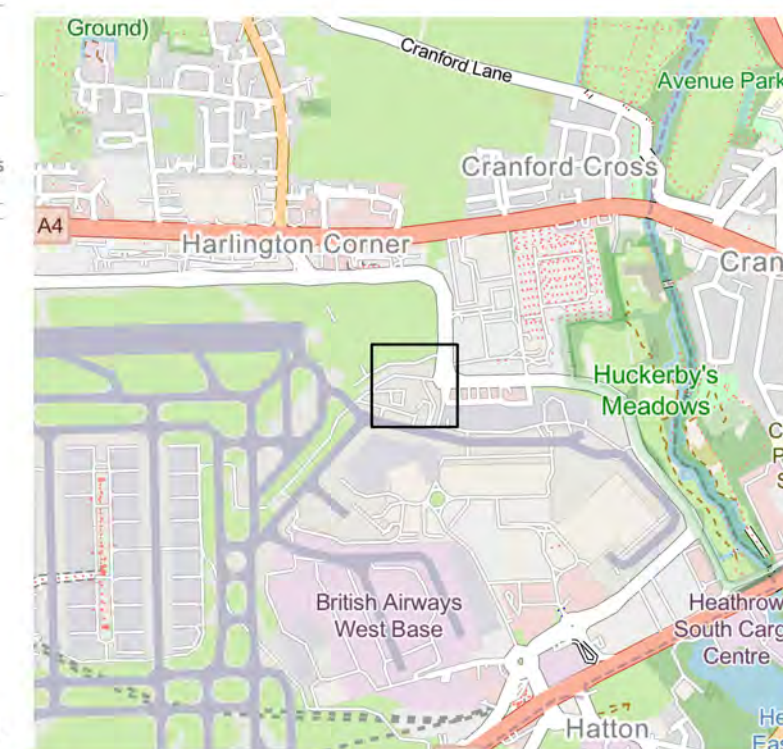
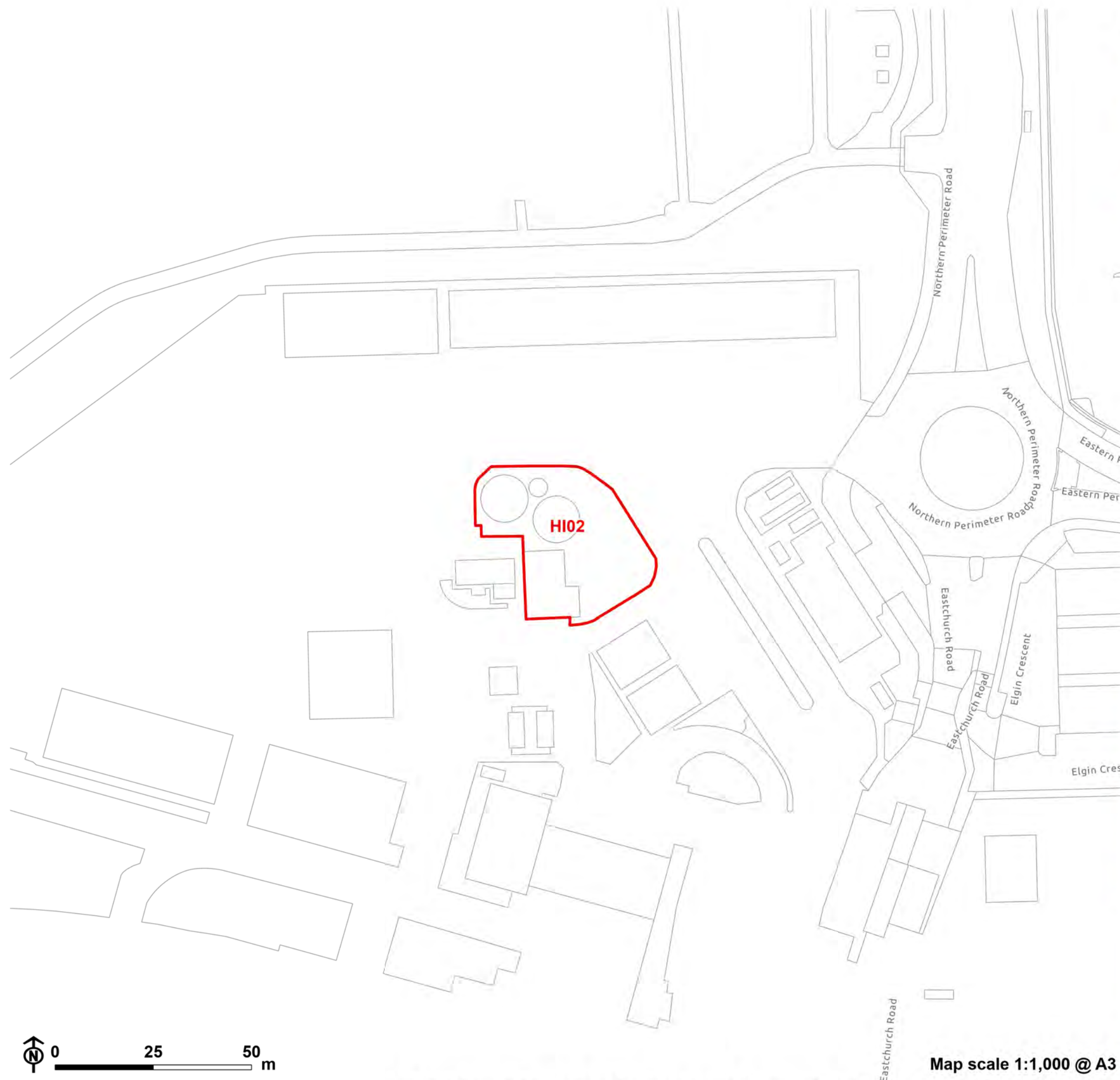
 Site boundary





**Figure : HI02 - Airside Waste Sweepings  
Treatment Facility**

 Site boundary



Map scale 1:1,000 @ A3



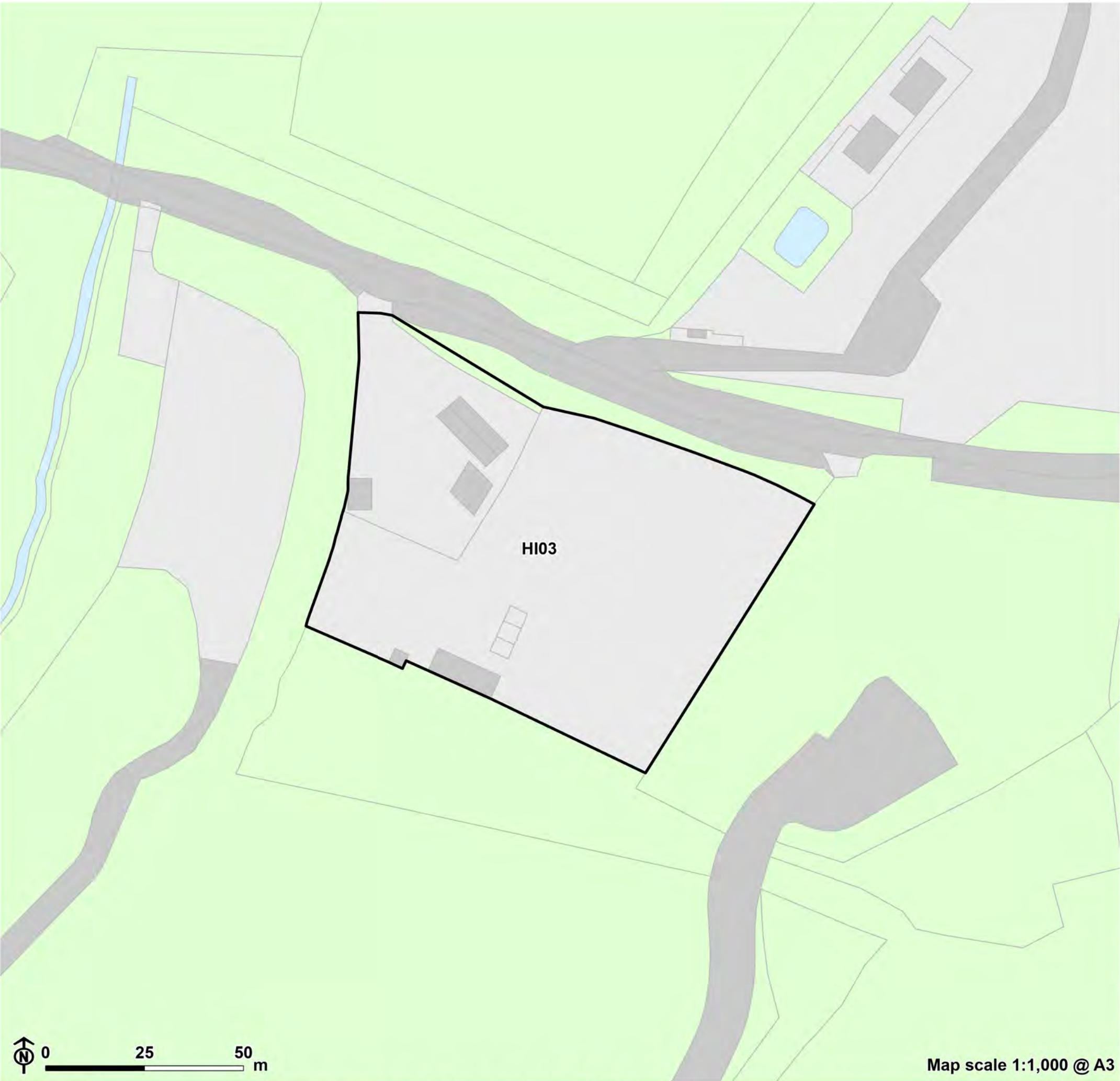
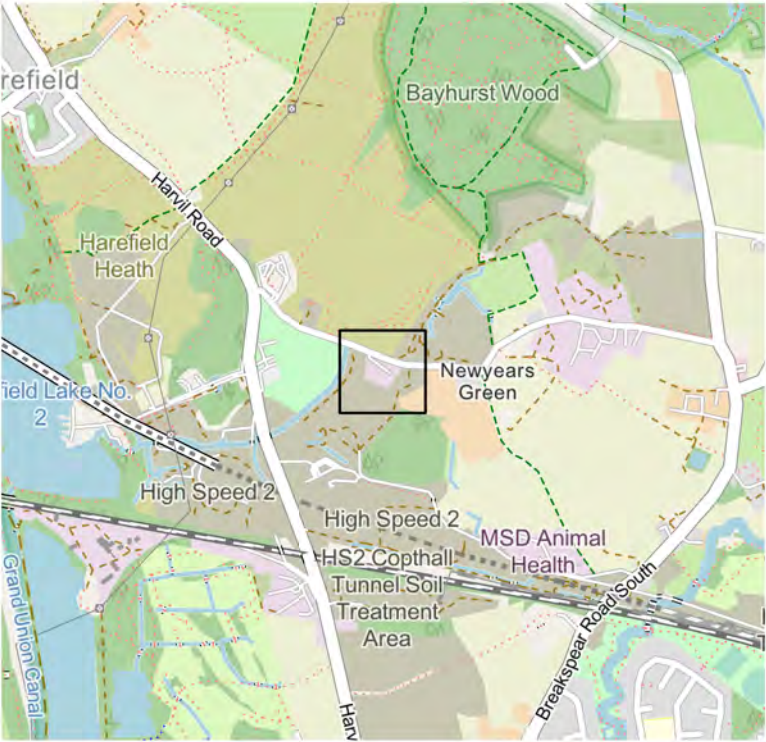


Figure 2: HI03 - New Years Green Lane

Site boundary





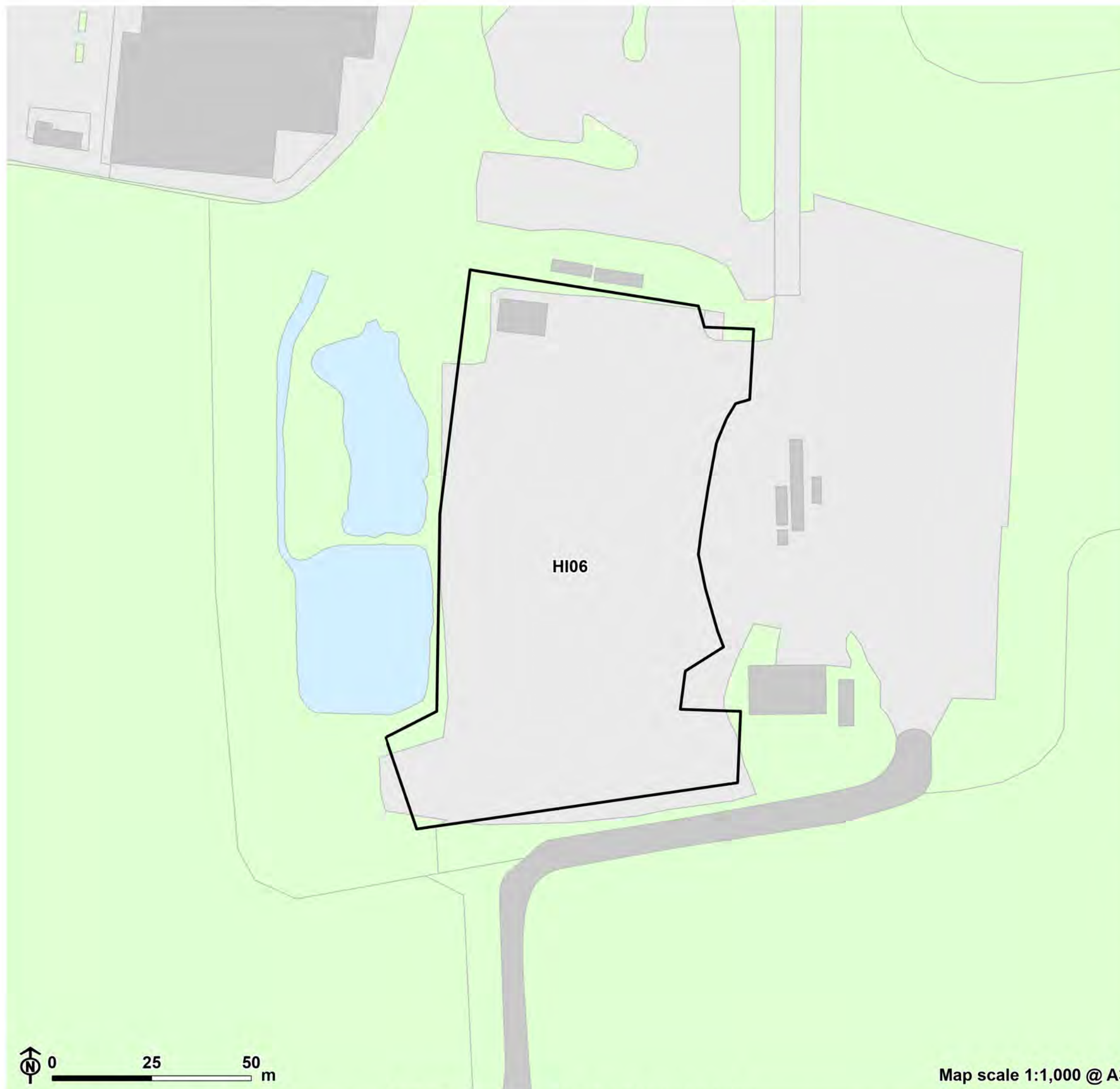


**Figure 3: HI04 - B&K WTS,Civic Way, Victoria Rd**

 Site boundary







**Figure 4: HI06 - Land off Holloway Lane  
Harmondsworth**

 Site boundary

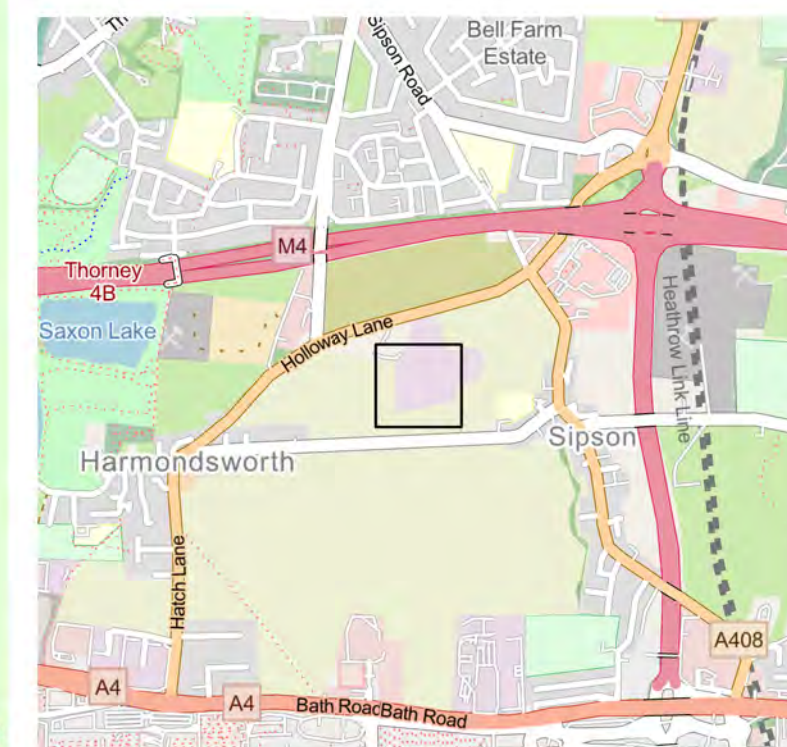
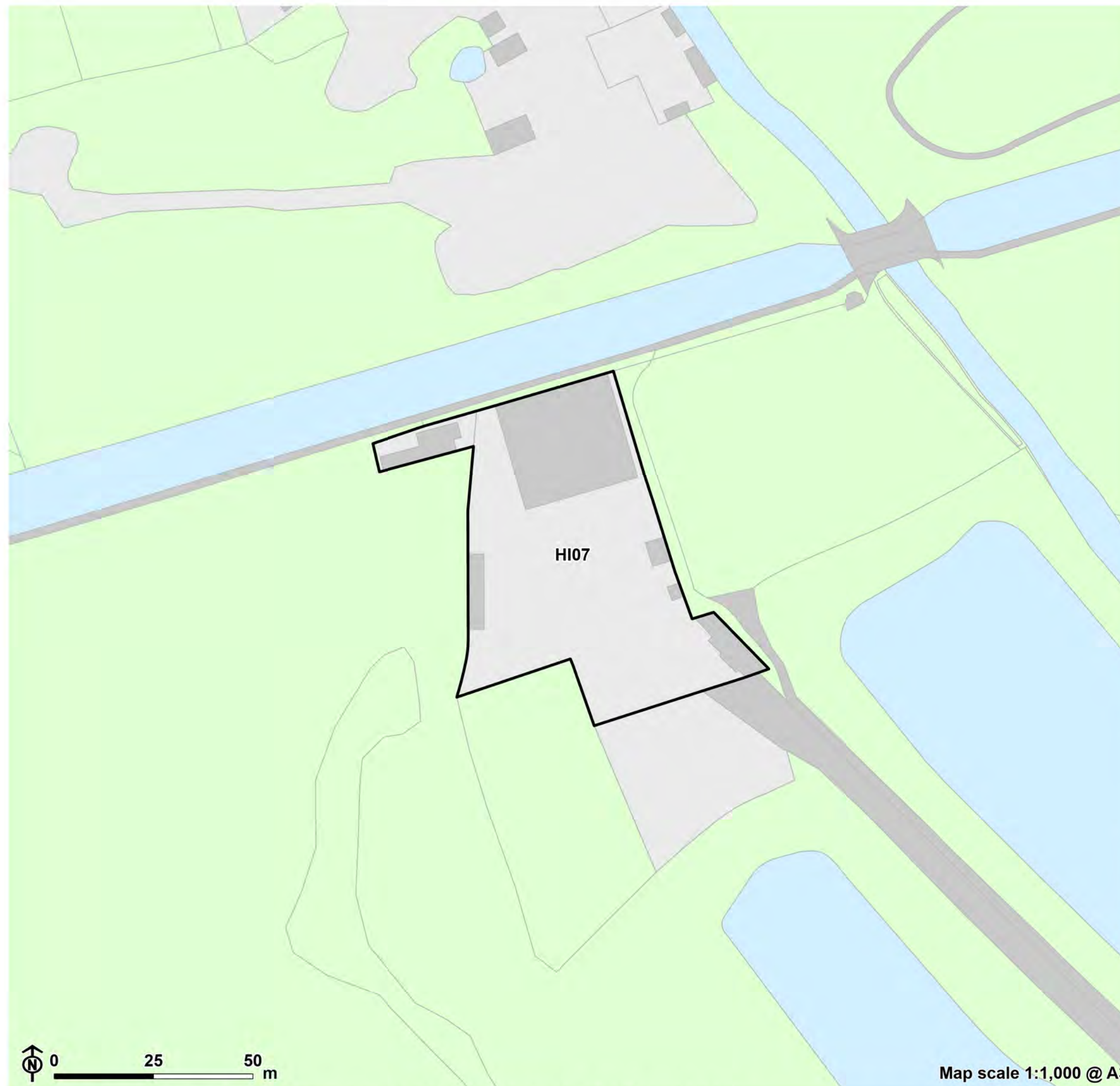




Figure 5: HI07 - G K Depot



Site boundary

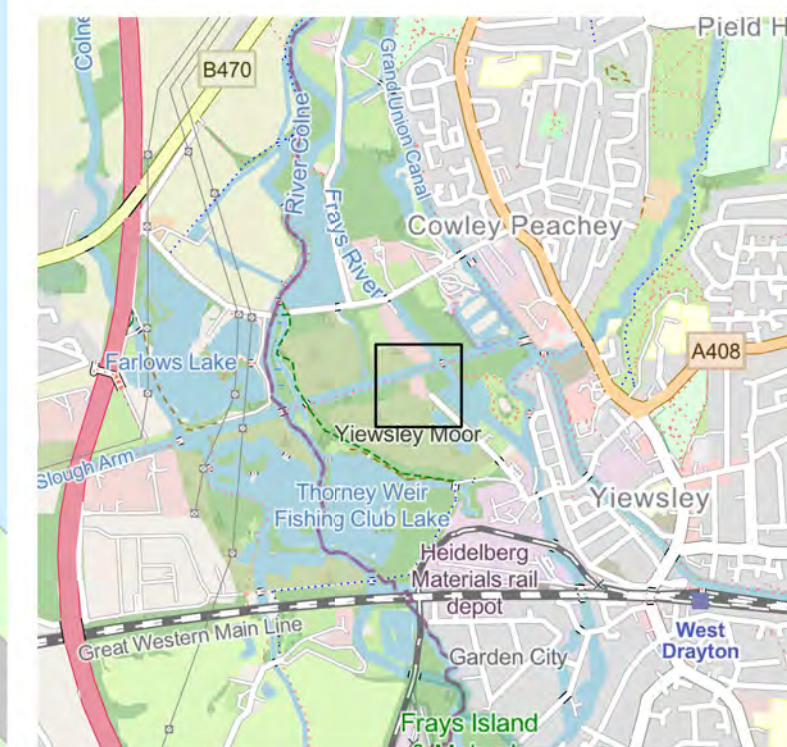

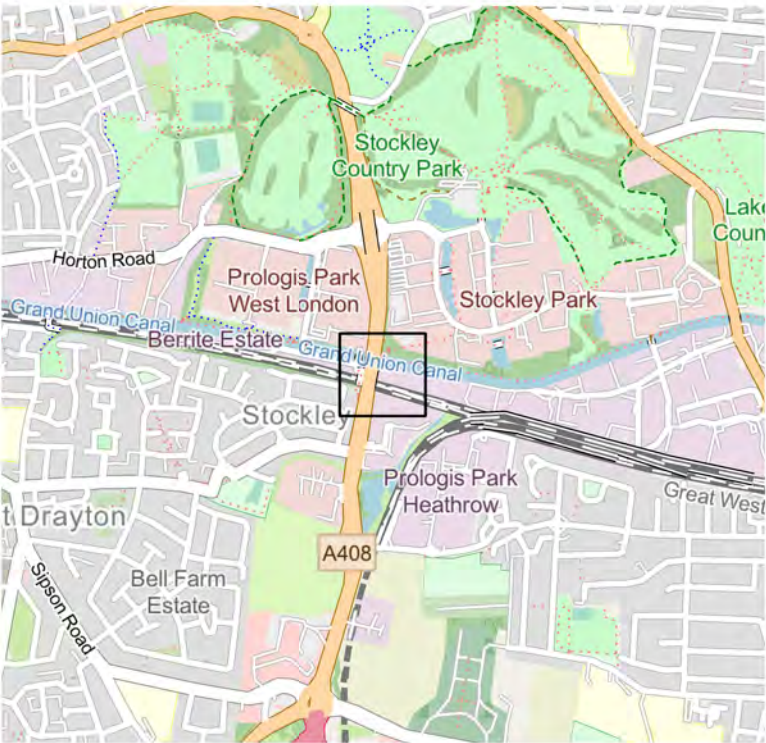




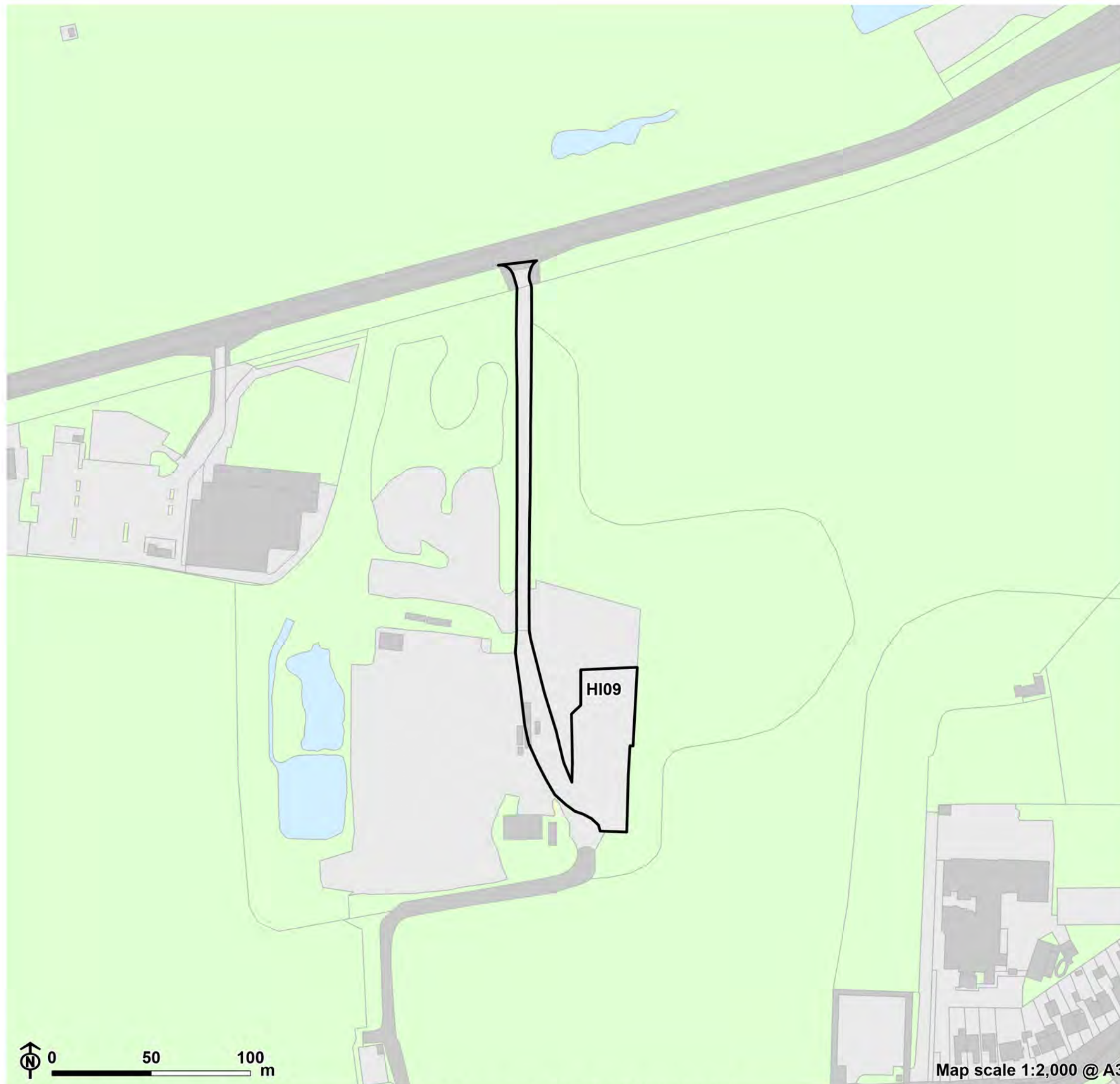


Figure 6: HI08 - West Drayton Aggregates

 Site boundary





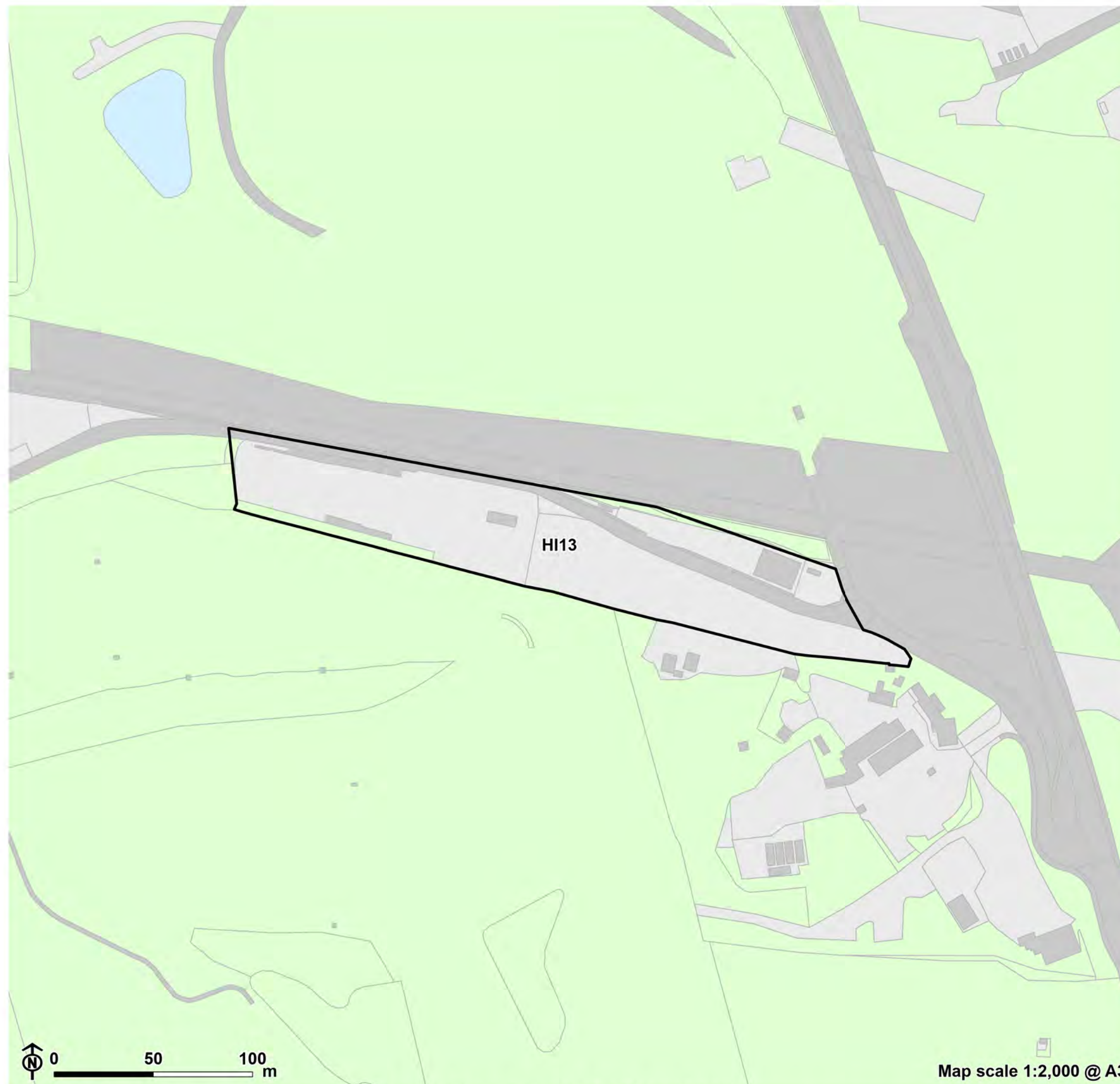


**Figure 7: HI09 - Holloway Lane Materials Recycling Facility**

Site boundary

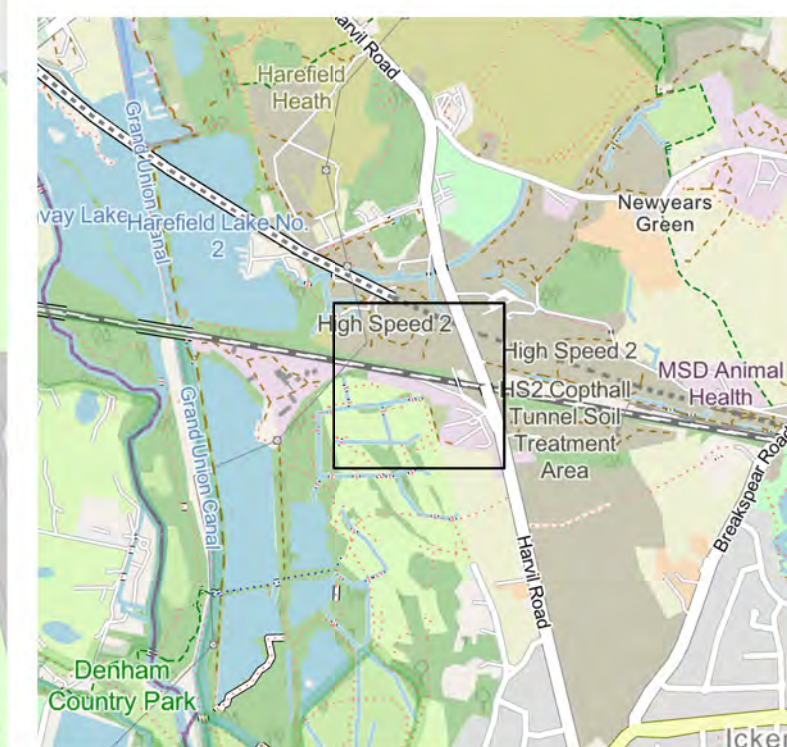




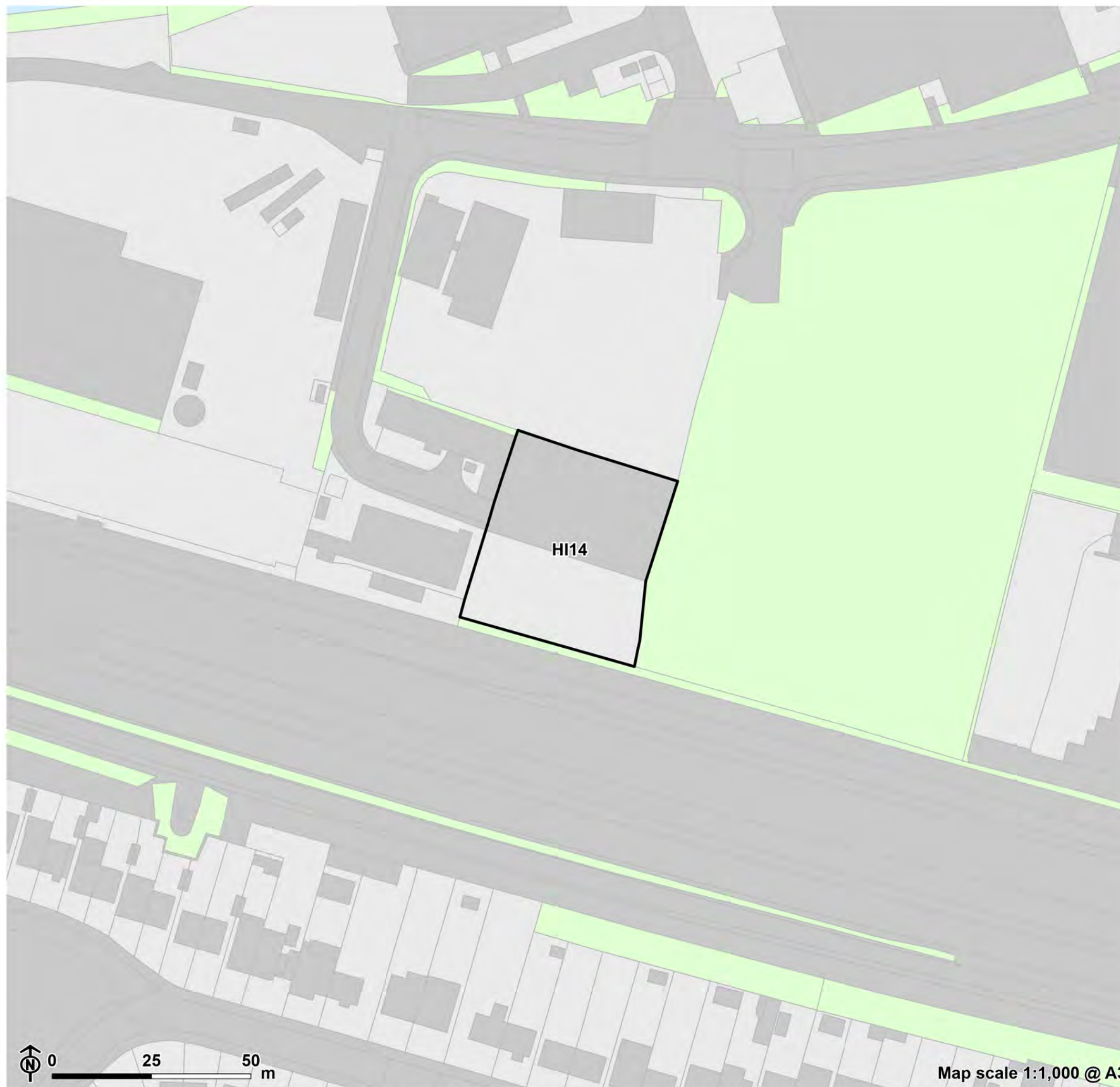


**Figure 8: HI13 - Skip Lane, Harville Road  
(Sortera)**

 Site boundary

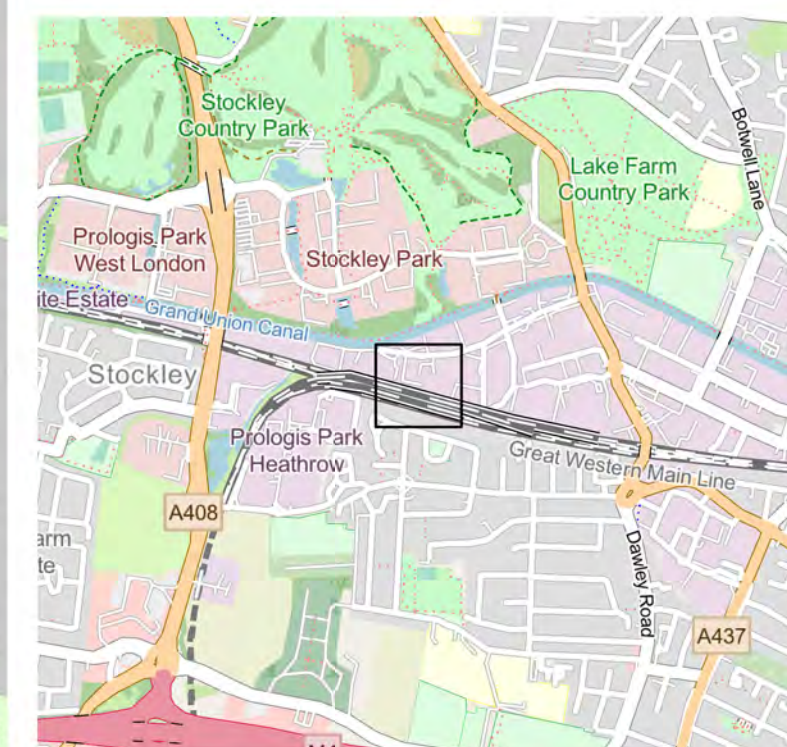




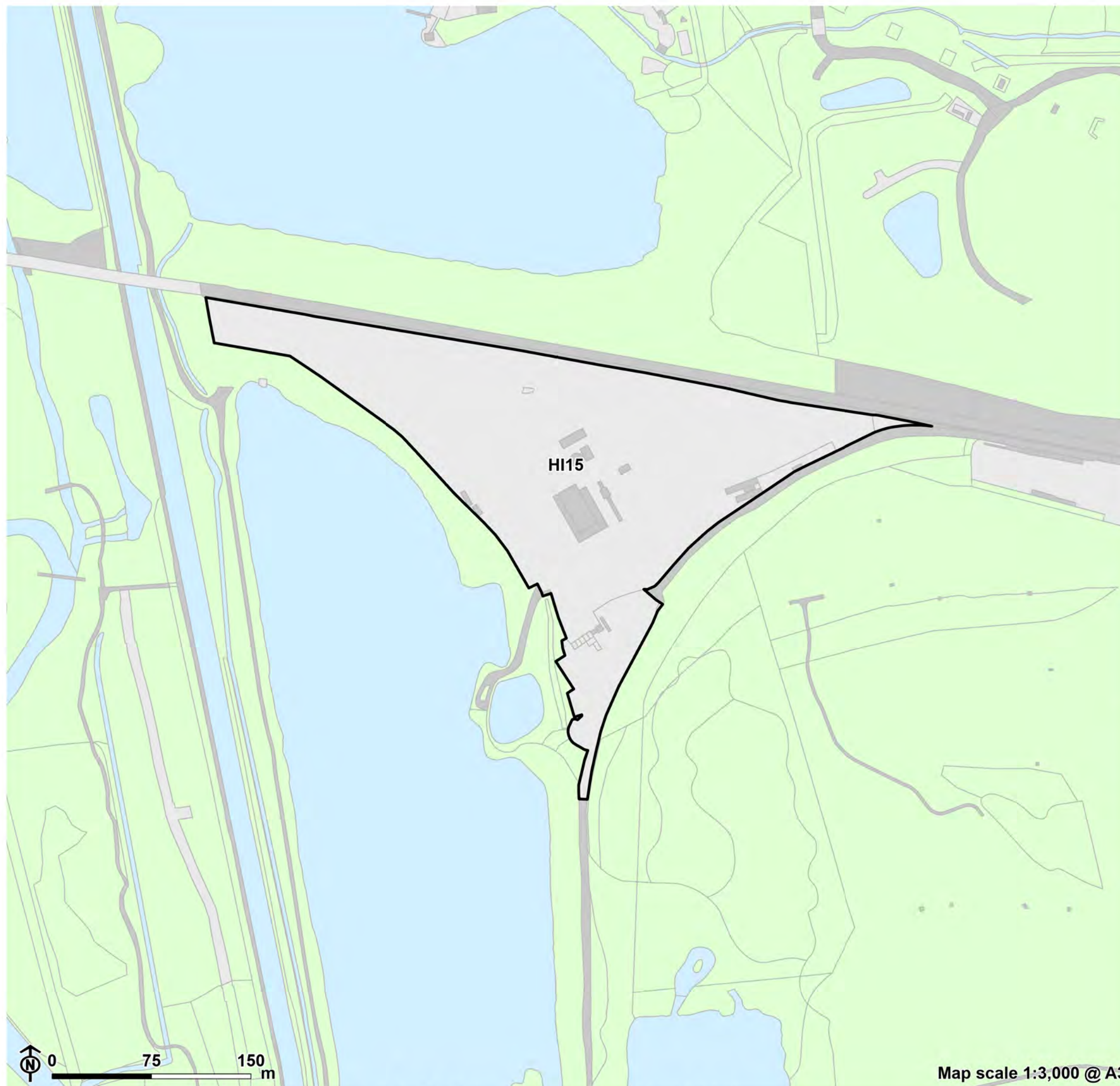


**Figure 9: HI14 - Talking Rubbish Waste Transfer Station Rigby Lane**

Site boundary

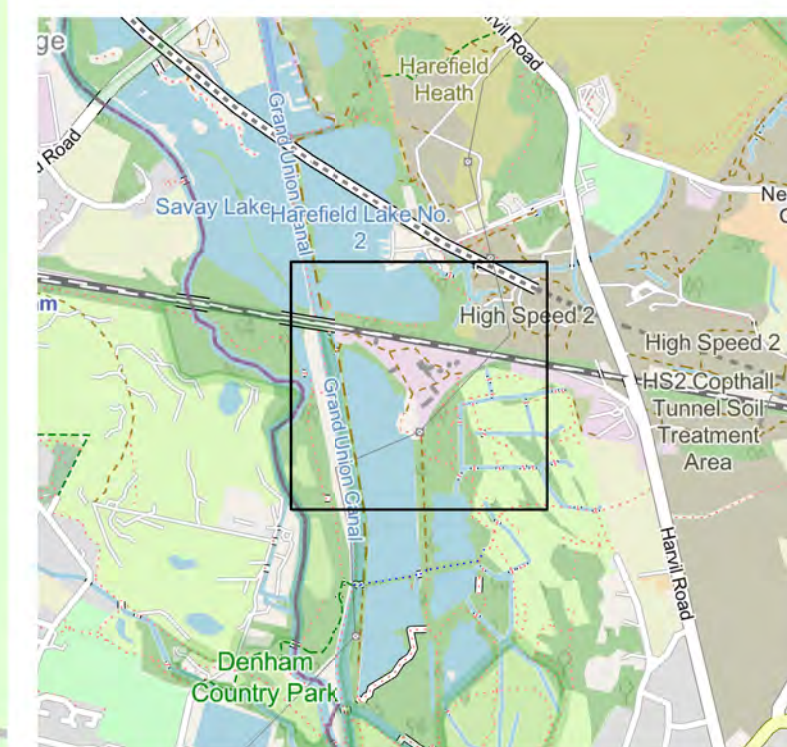






**Figure 10: HI15 - Thames Materials Skip Lane**

 Site boundary

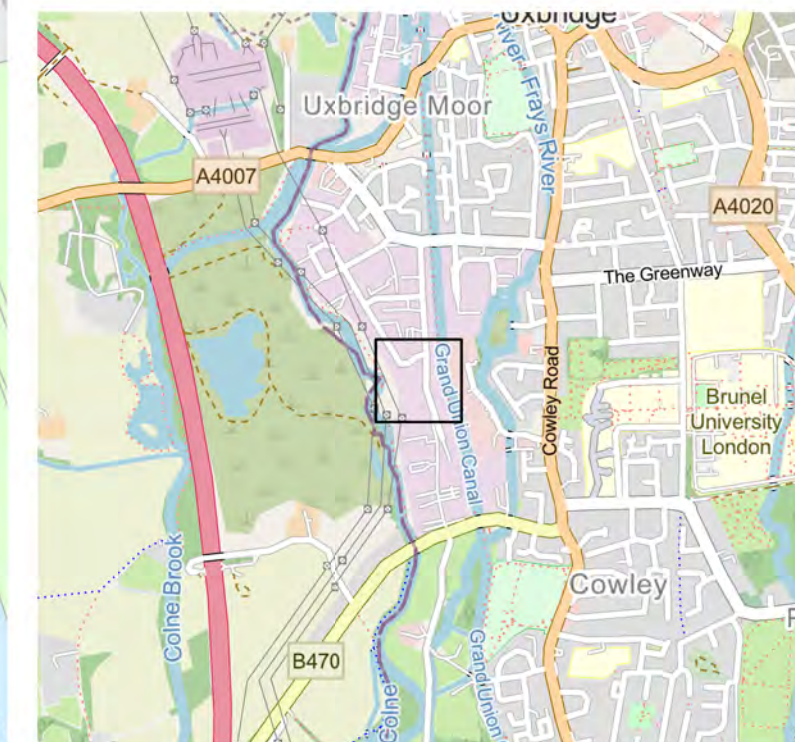






**Figure 11: HI16 - Wallingford Road Recycling Facility**

Site boundary





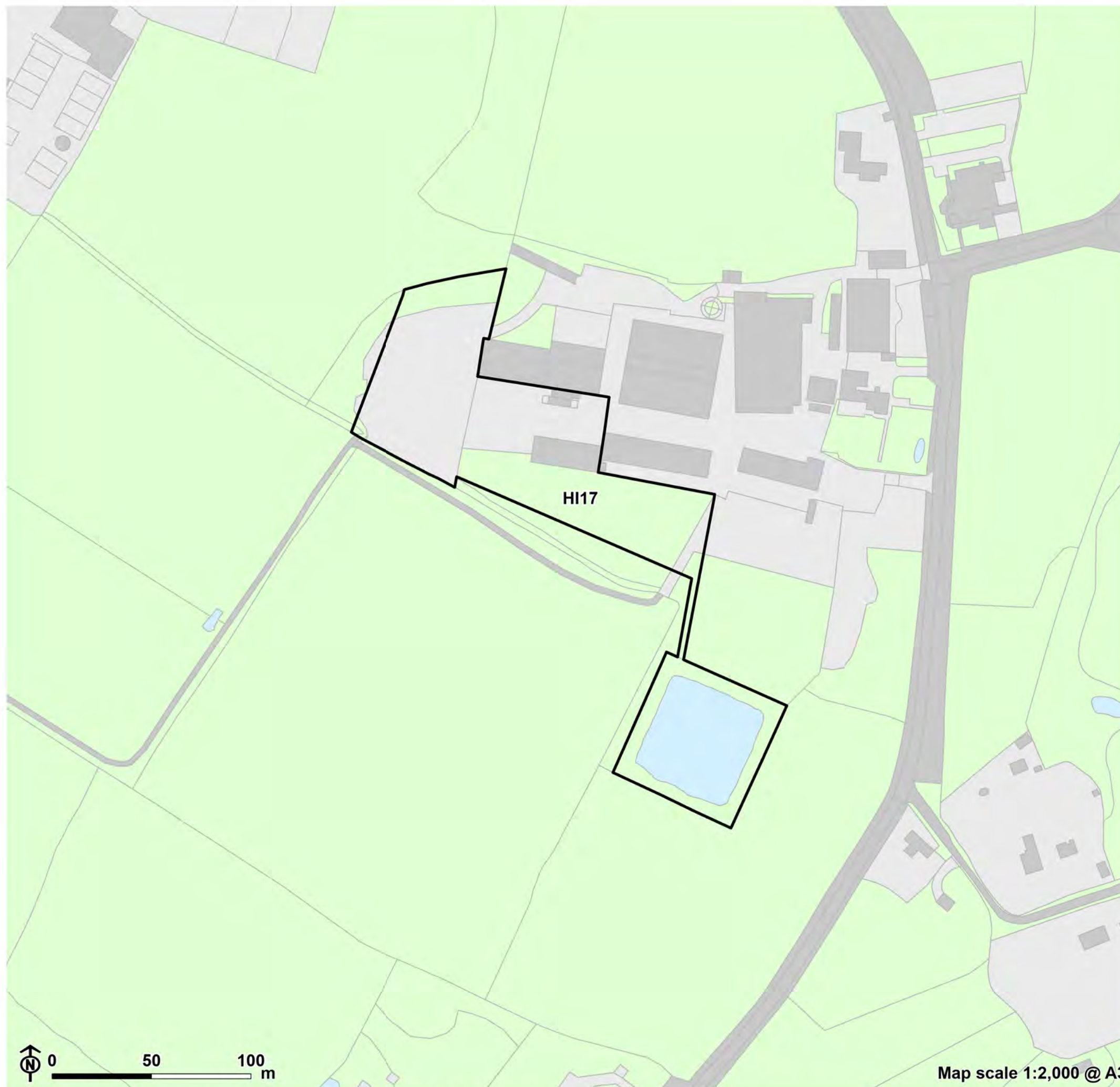
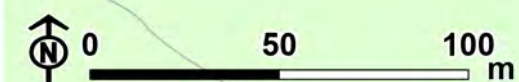
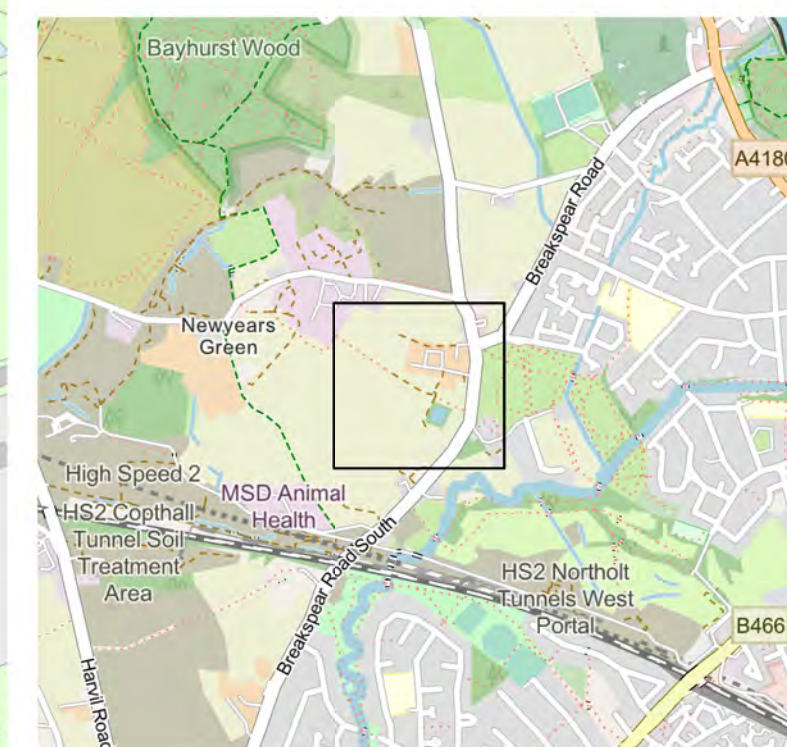


Figure 12: HI17 - Crows Nest Farm

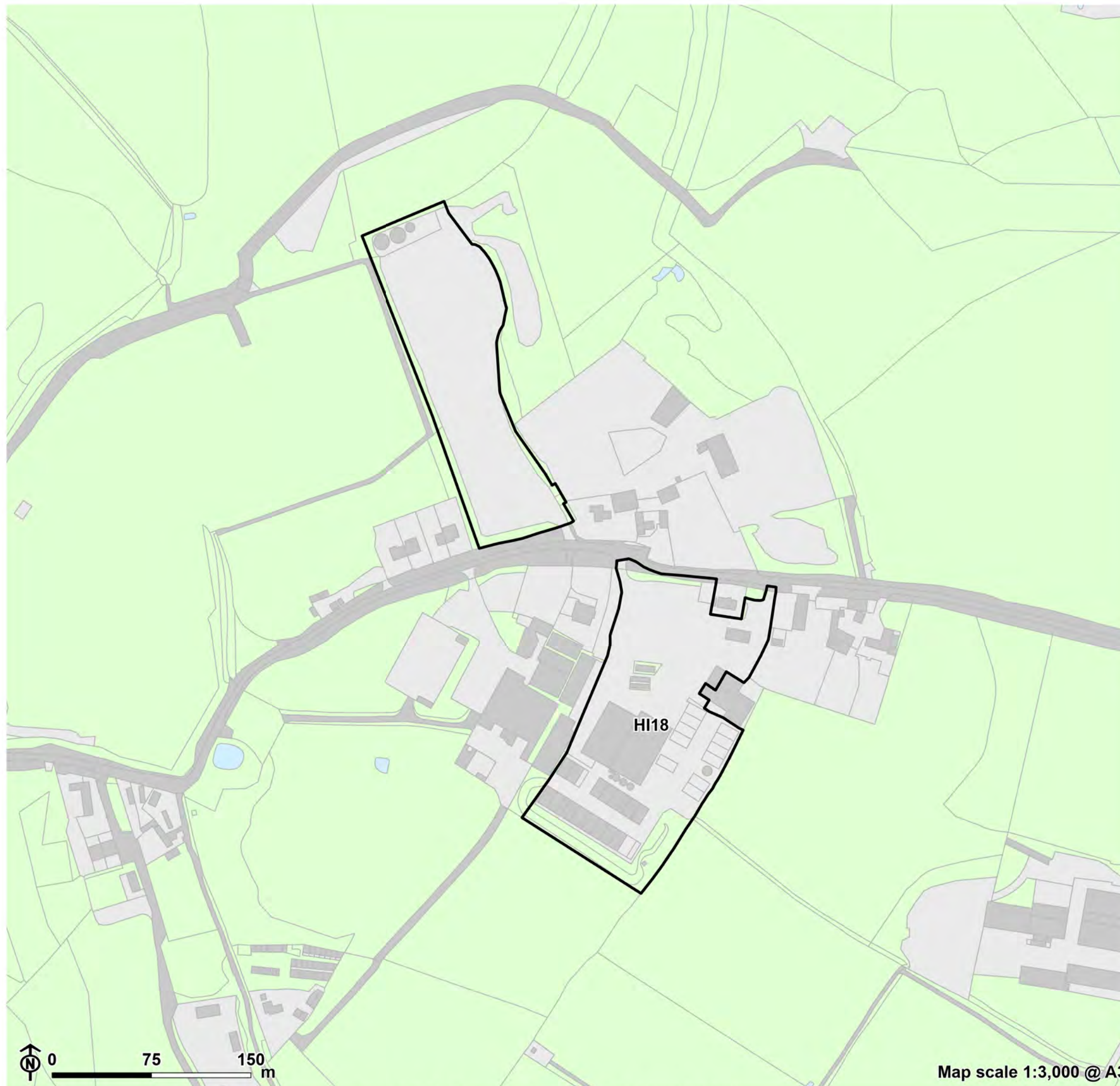
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
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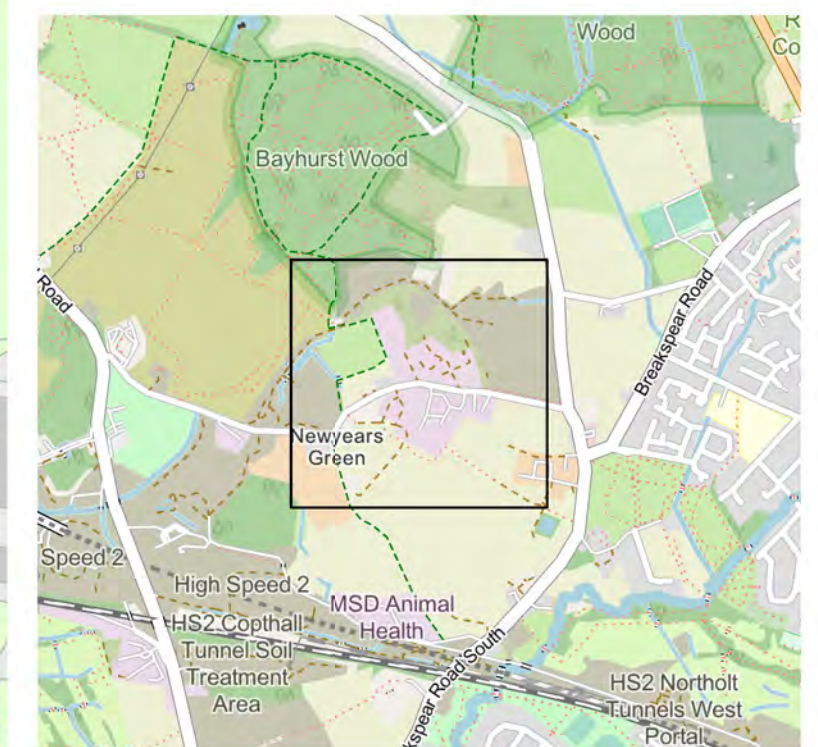






**Figure 13: HI18 - High View Farm**

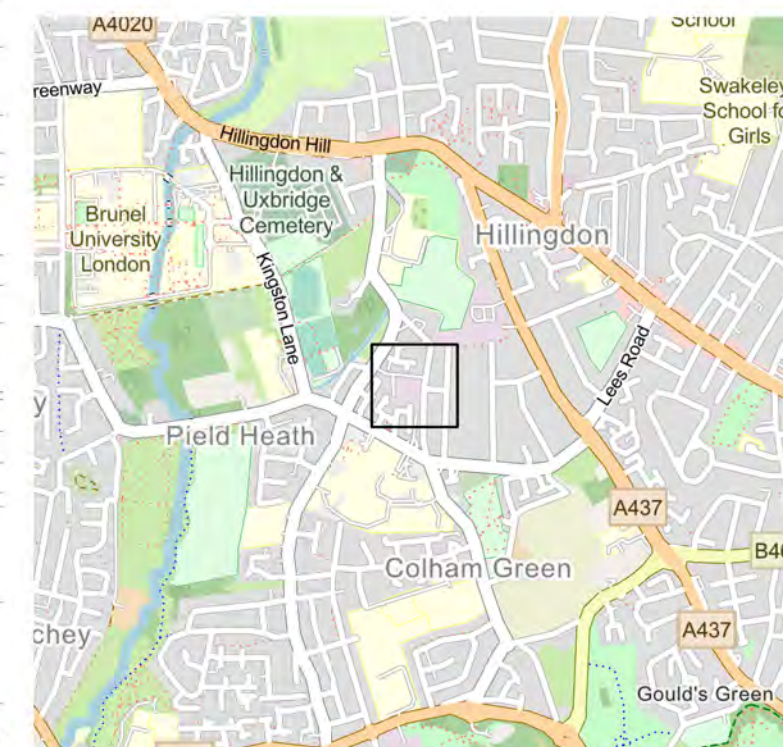
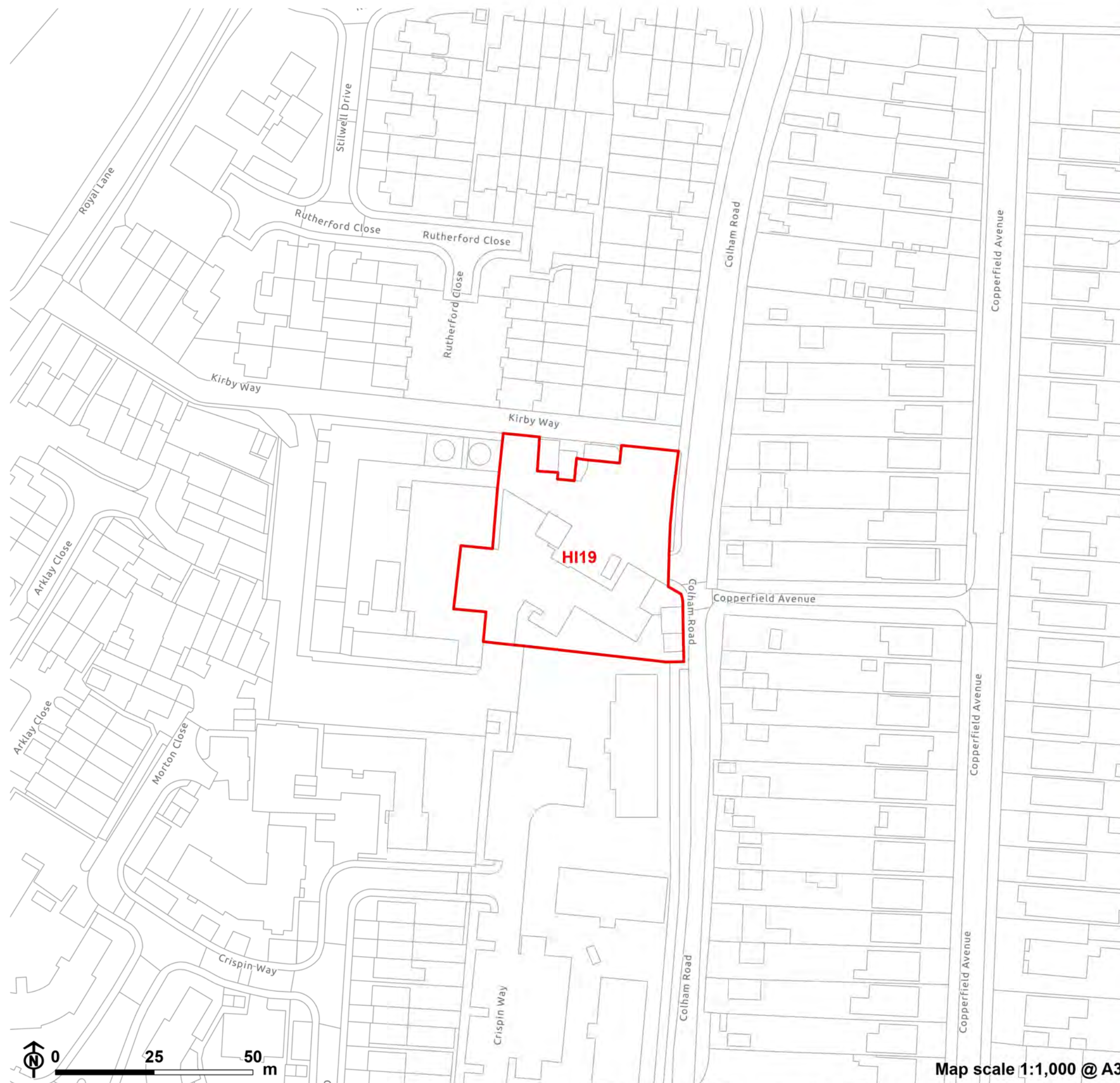
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**Figure : HI19 - Hillingdon Clinical Waste  
Incinerator**

Site boundary



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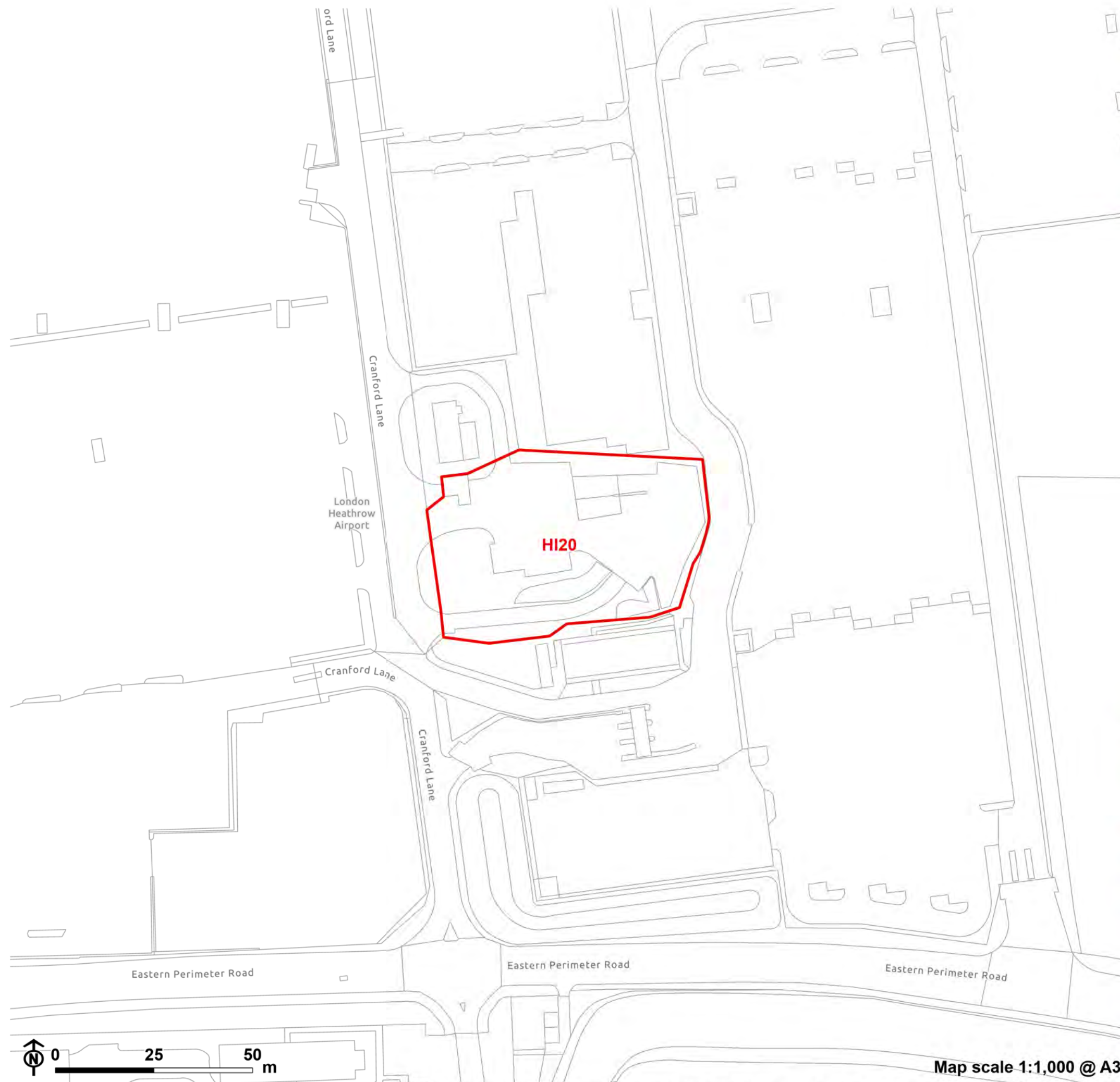
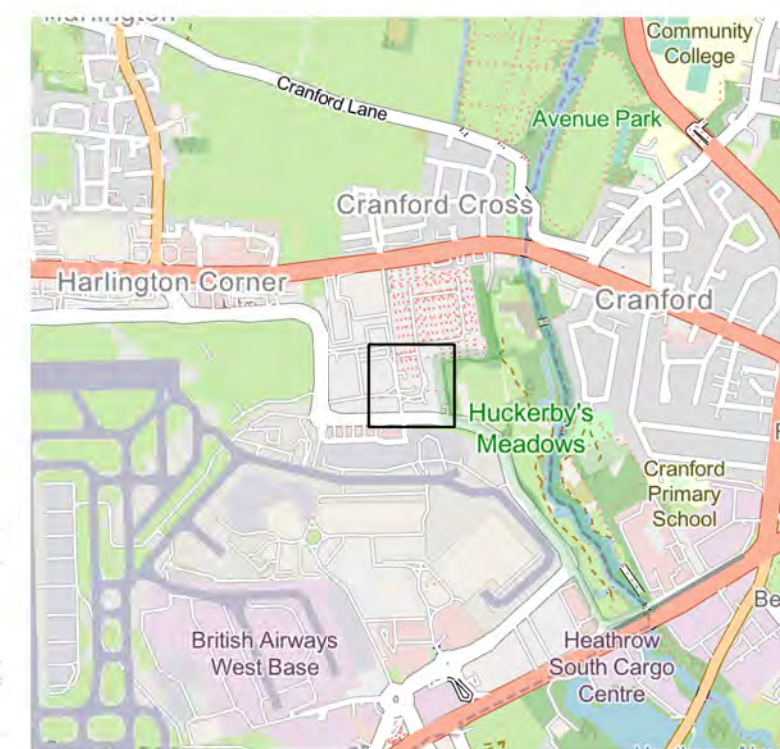



Figure : HI20 - Cranford Lane WTS, Heathrow

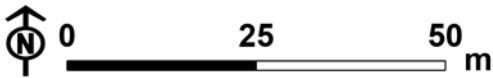
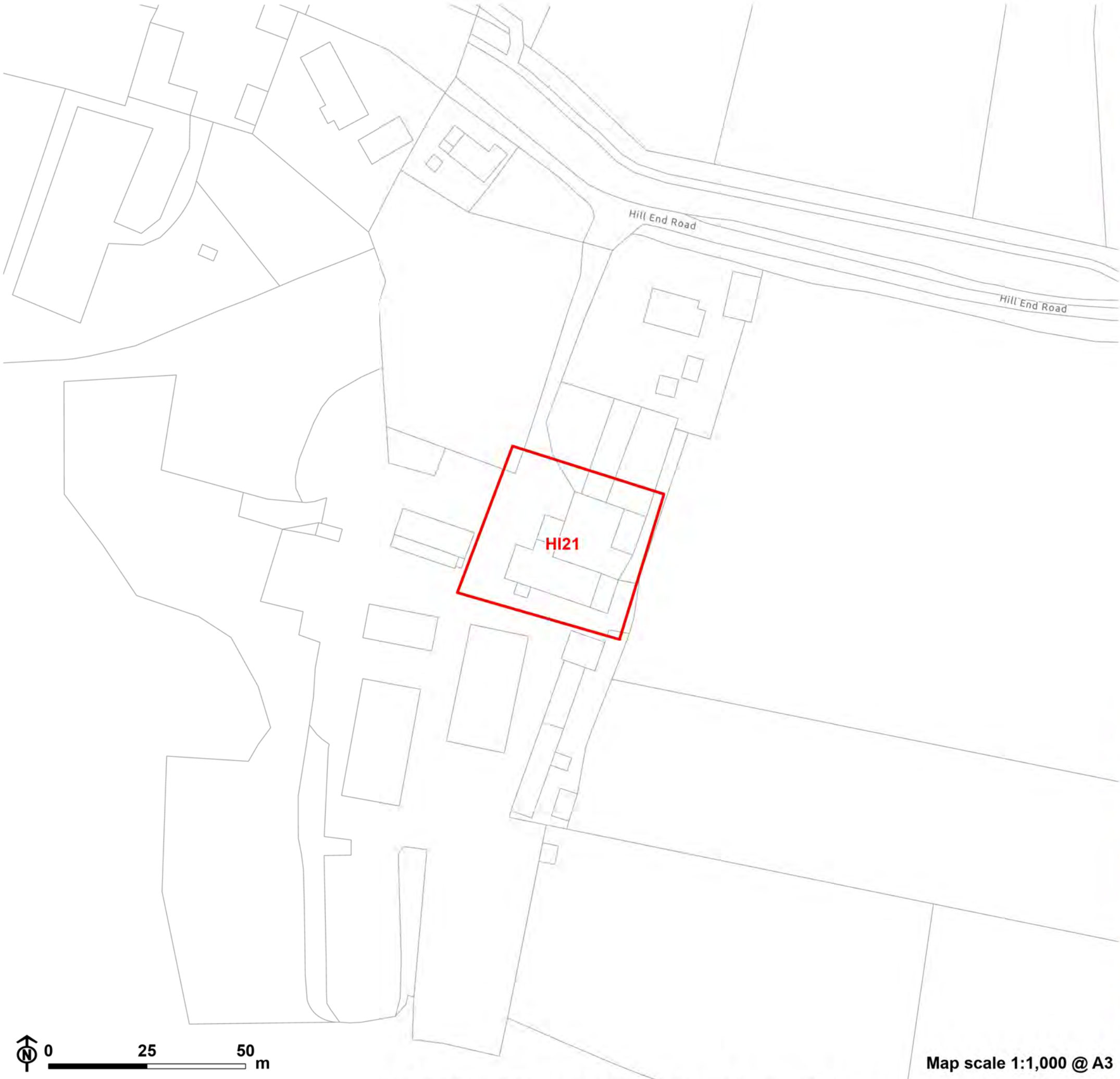
Site boundary





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

 Site boundary



**Map scale 1:1,000 @ A3**

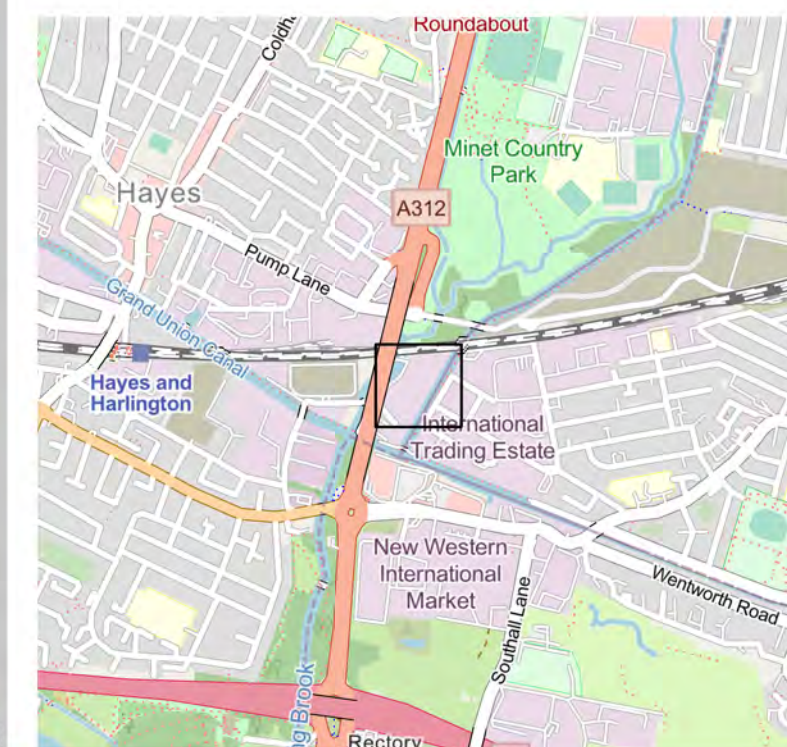







Figure 14: HI24 - Heathrow Depot

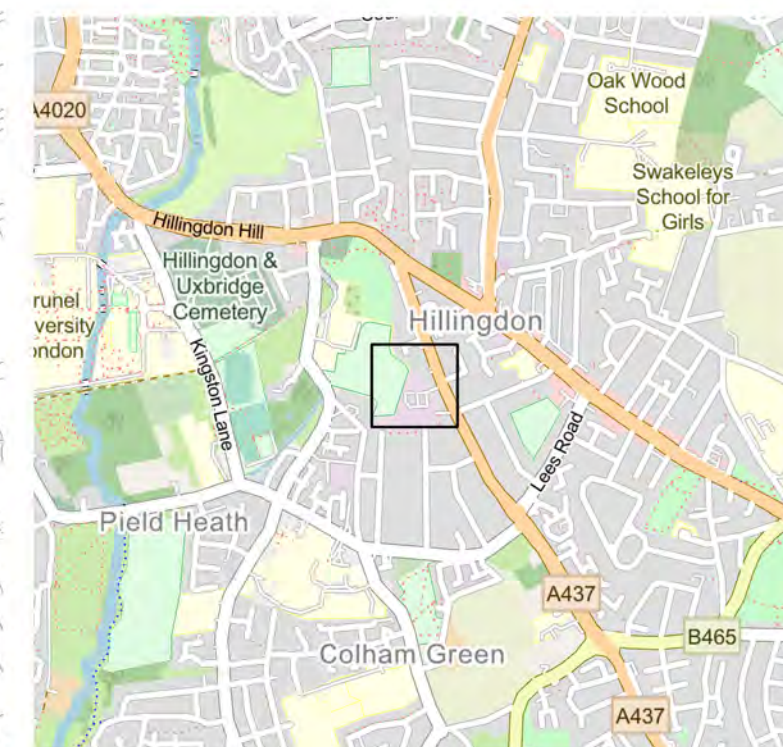
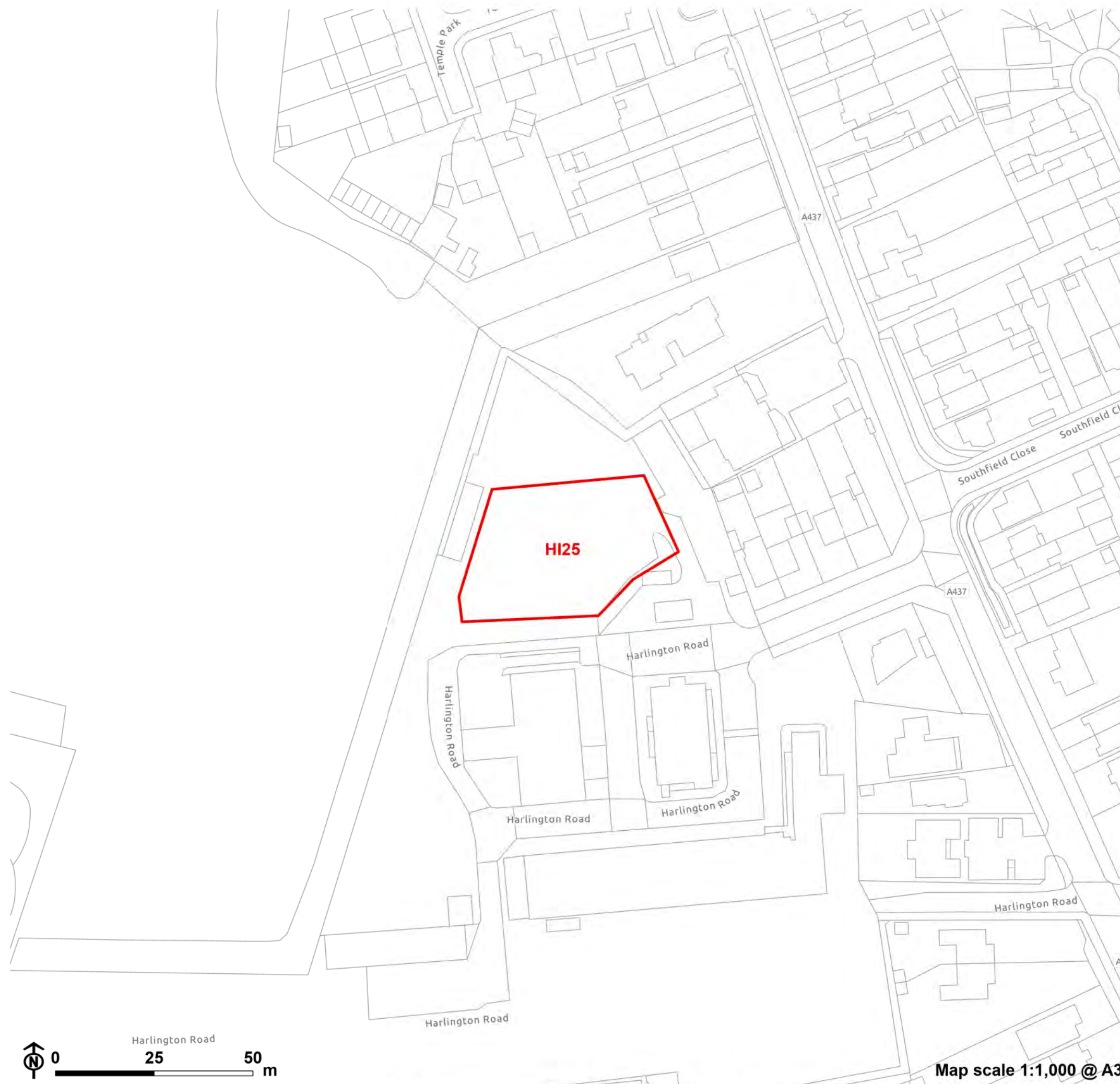
Site boundary





**Figure : HI25 - Central Depot Harlington Road**

 Site boundary



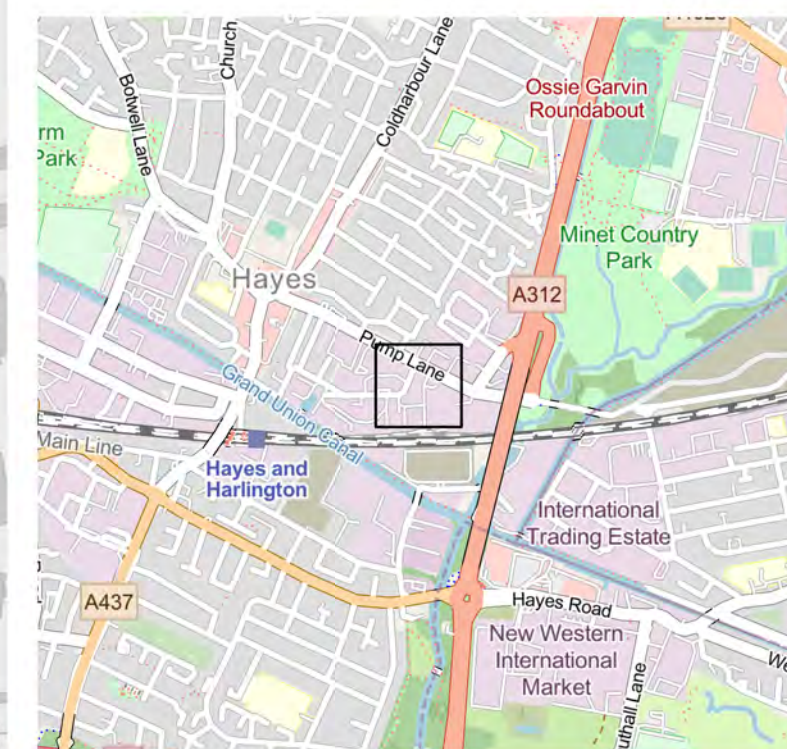
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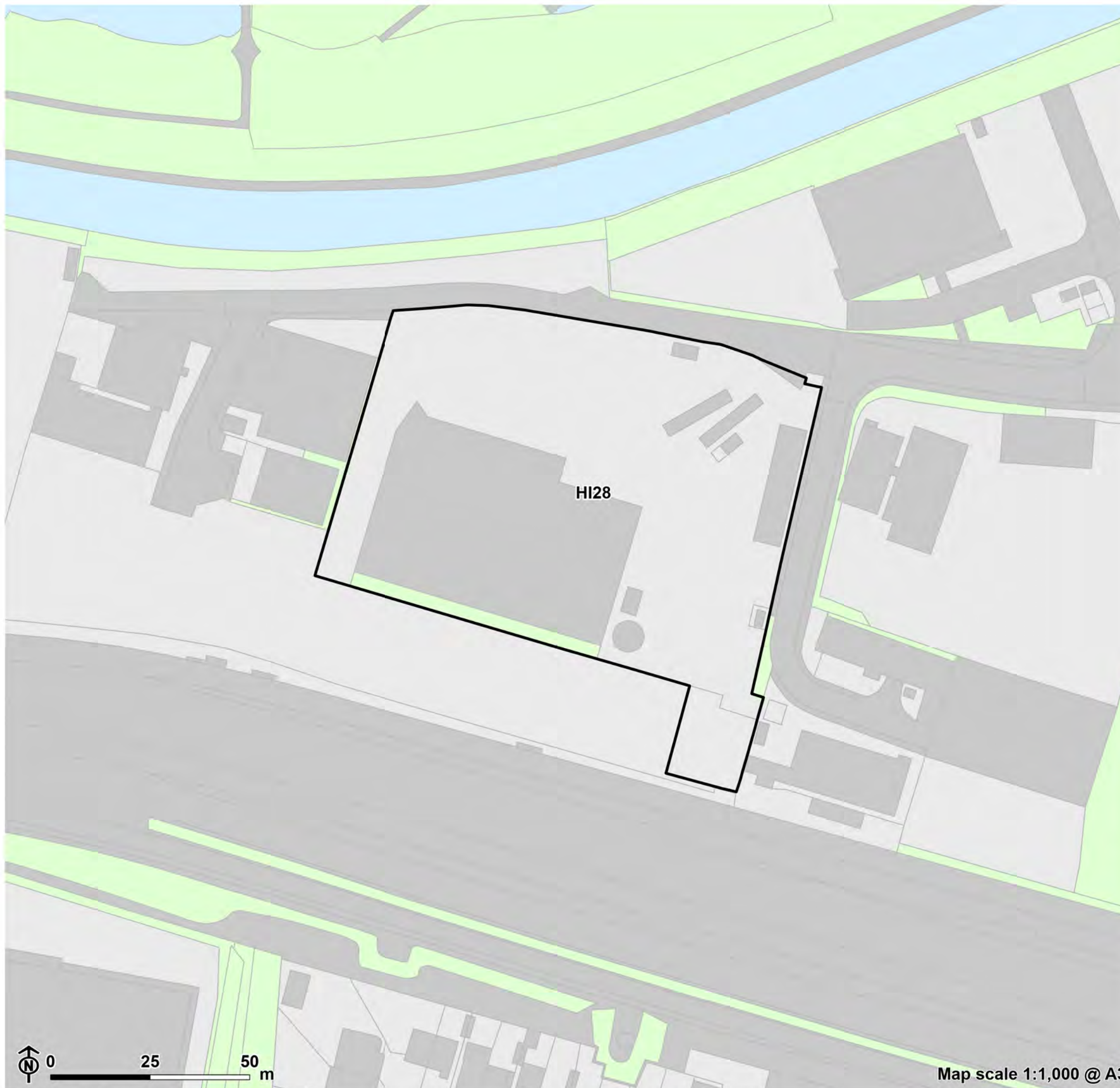


**Figure 15: HI27 - Unit 1 & 2 Pump Lane  
Industrial Estate**

Site boundary

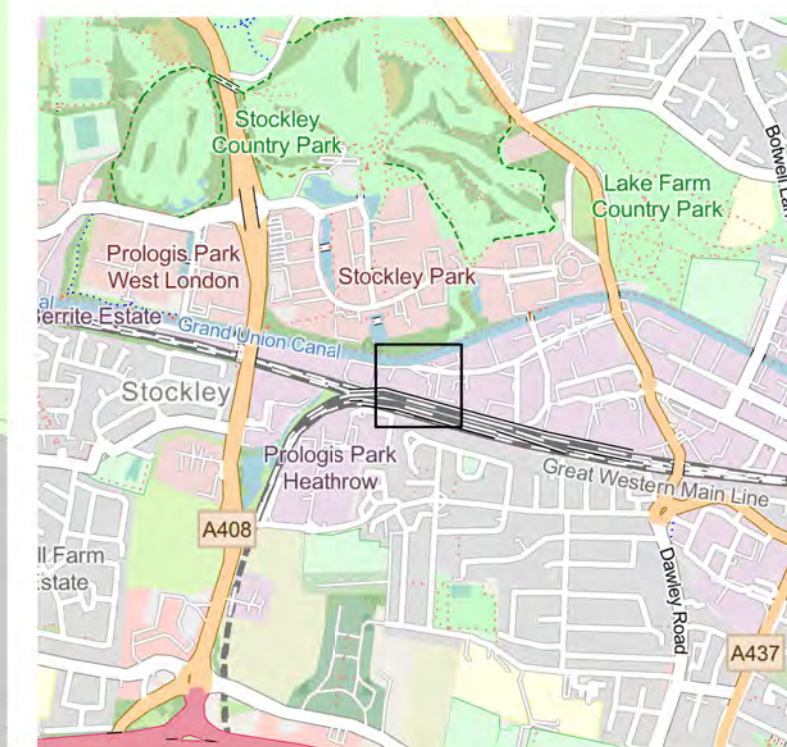







**Figure 16: HI28 - Hayes Transfer Station, Rigby Road**

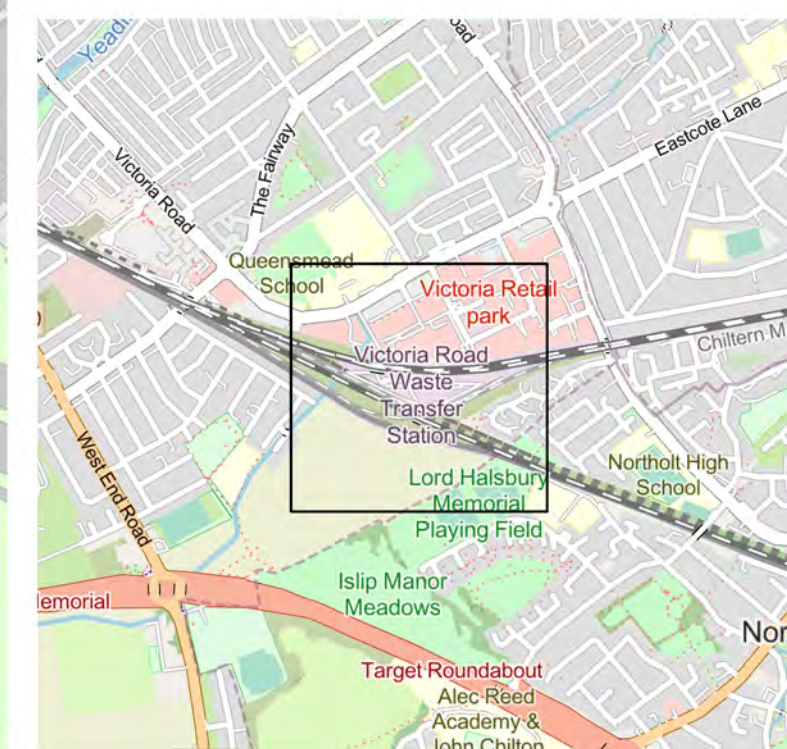
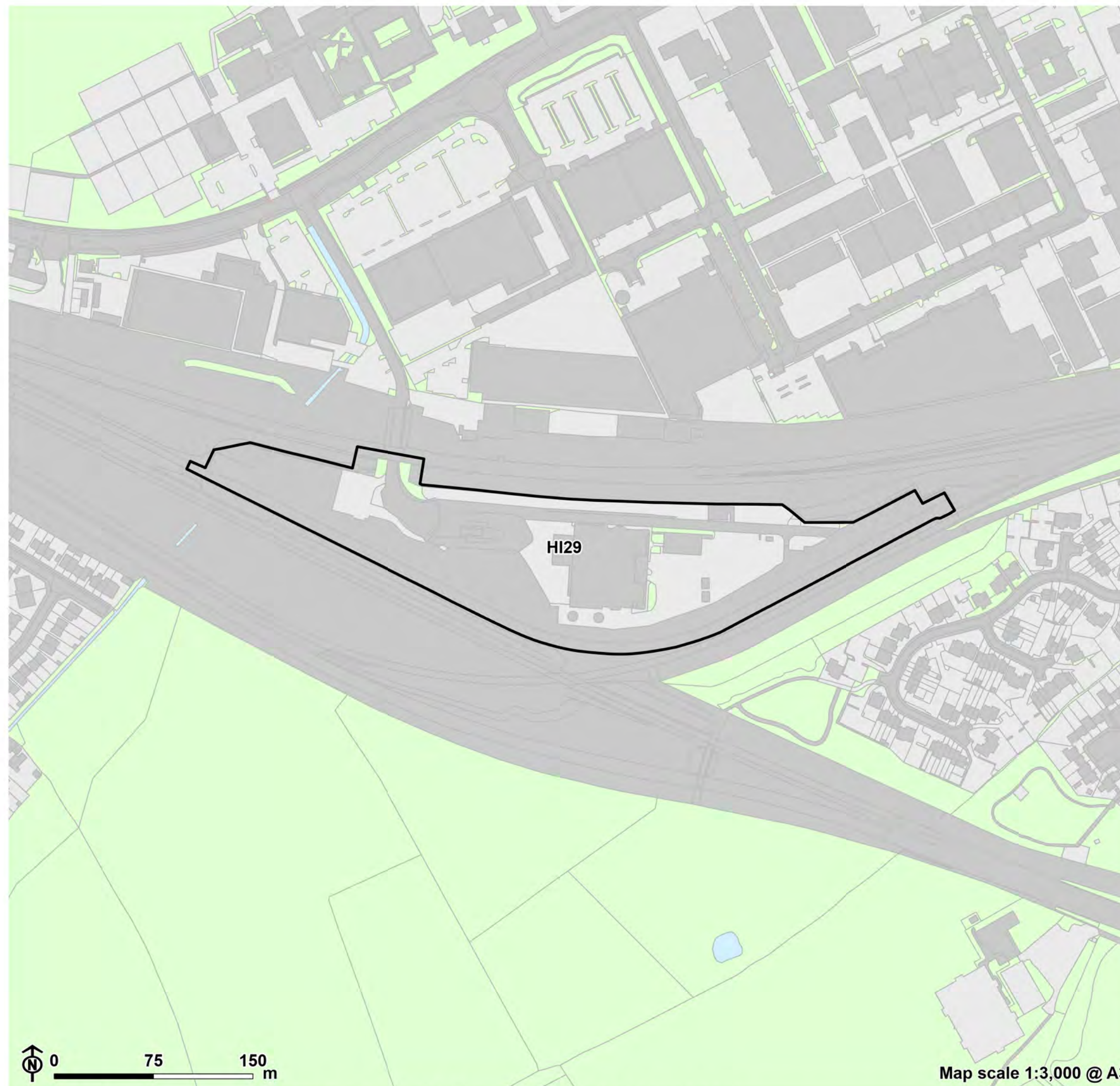
 Site boundary





**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.

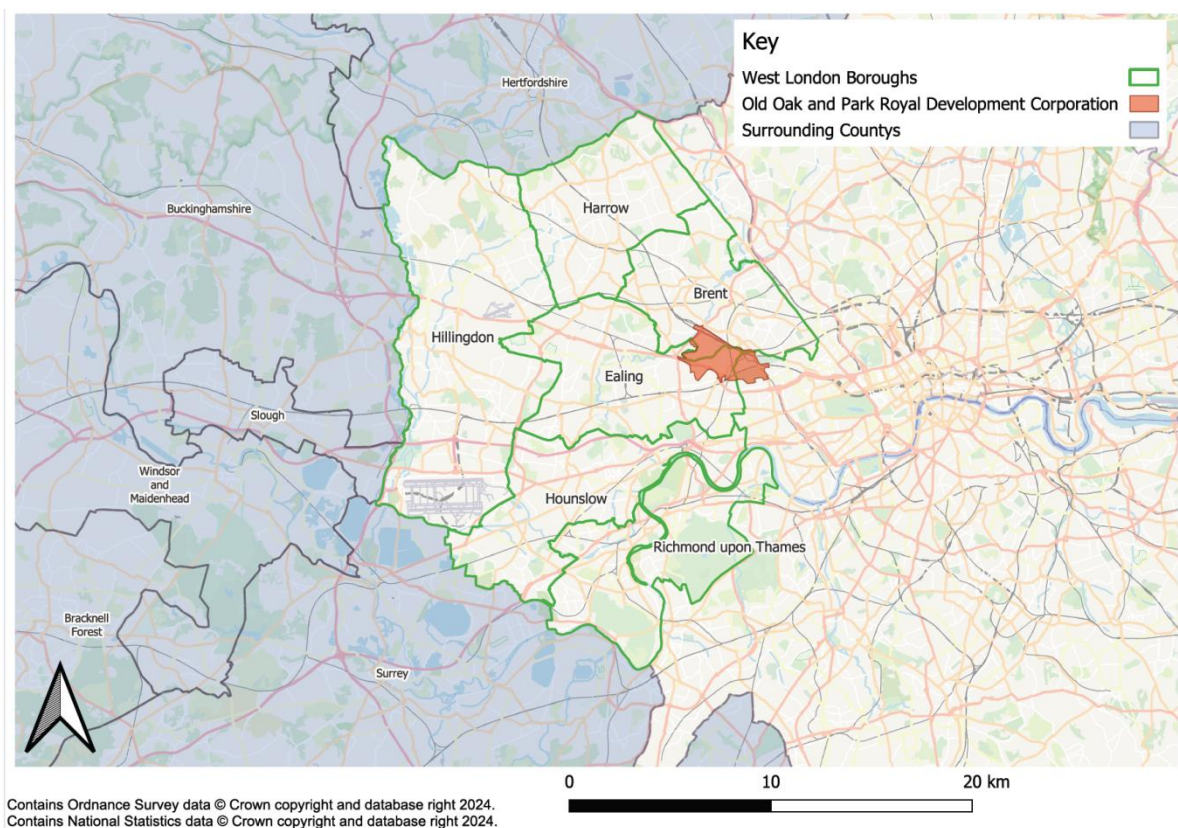
## 2 Introduction and background

### 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 legislation<sup>1</sup> and policy<sup>2</sup> 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.

---

<sup>1</sup> Planning and Compulsory Purchase Act 2004 and the Town and Country (Local Planning) (England) Regulations 2012

<sup>2</sup> National Planning Policy Framework, December 2024

**Table 1: Anticipated Timetable for Preparation of the West London Waste Plan**

<b>Key Stage</b>	<b>Timeline</b>
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.<sup>3</sup> 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/>.

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<sup>3</sup> 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](mailto: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 1990<sup>4</sup>, 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 waste<sup>5</sup>. 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.

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<sup>4</sup> Transposing the Waste Framework Directive as amended 2008/98/EC.

<sup>5</sup> 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 inert<sup>6</sup> 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.

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<sup>6</sup> 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
<b>Brent</b>	259,000	274,000
<b>Ealing</b>	291,000	306,000
<b>Harrow</b>	188,000	205,000
<b>Hillingdon</b>	347,000	365,000
<b>Hounslow</b>	260,000	275,000
<b>Richmond upon Thames</b>	179,000	190,000
<b>Total</b>	<b>1,524,000</b>	<b>1,615,000</b>

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 2023<sup>7</sup> is set out in Table 4 below.

<sup>7</sup> 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
<b>C&amp;D Waste</b>	Inert	25%	<1%	7%	7%	0%
	Non-inert	25%	<1%	<1%	35%	0%
	<b>Subtotal C&amp;D</b>	<b>50%</b>	<b>1%</b>	<b>7%</b>	<b>42%</b>	<b>0%</b>
<b>Excavation Waste</b>	Inert	14%	65%	0%	21%	<1%
	Non-inert	<1%	0%	<1%	0%	0%
	<b>Subtotal Excavation</b>	<b>14%</b>	<b>65%</b>	<b>&lt;1%</b>	<b>21%</b>	<b>&lt;1%</b>

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 offsite<sup>8</sup>. 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;*

<sup>8</sup> Data provided by the National Federation of Demolition Contractors.

- *excavation – 95 per cent beneficial use overall and 100% of inert excavation beneficial used.*<sup>9</sup>

### 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)*

<b>Hazardous Waste Type/Source</b>	<b>2023</b>
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
<b>Total</b>	<b>45,720<sup>10</sup></b>

### 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) areas<sup>11</sup>. 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 dataset<sup>12</sup>, the Waste Data Interrogator (WDI), and therefore cannot be

<sup>9</sup> London Plan Footnote 164

<sup>10</sup> Totals less than the 52,500t total above as these are the principal waste components.

<sup>11</sup> See 'Identification of Strategically Significant Cross Boundary Waste Movements from West London', BPP Consulting, October 2025

<sup>12</sup> 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
<b>Total West London waste managed</b>	<b>3,676,877</b>			

4.25 Figure 2<sup>13</sup> displays the balance between imports and exports by waste management method and waste type to and from West London in 2023.

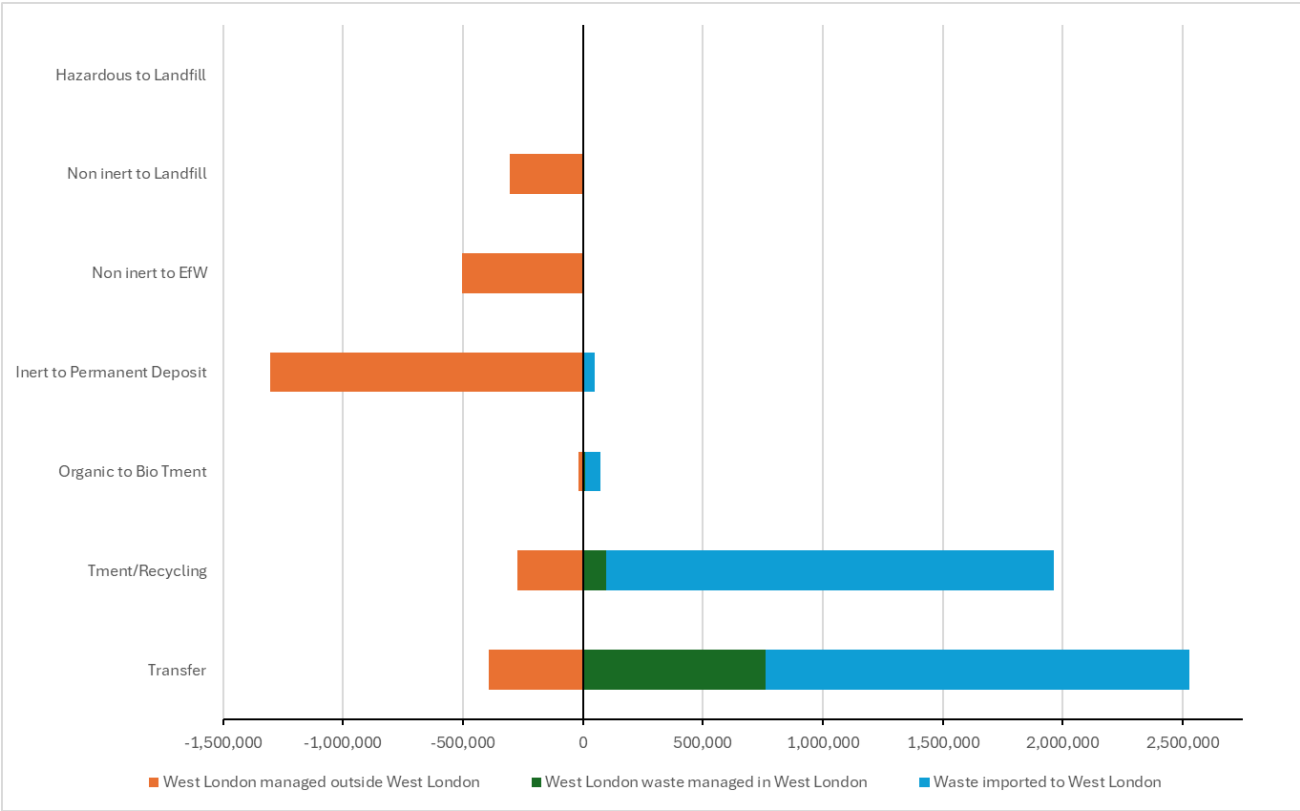


Figure 2:: Flows of Waste for Management at Permitted Facilities

October 2025  
<sup>13</sup> 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.

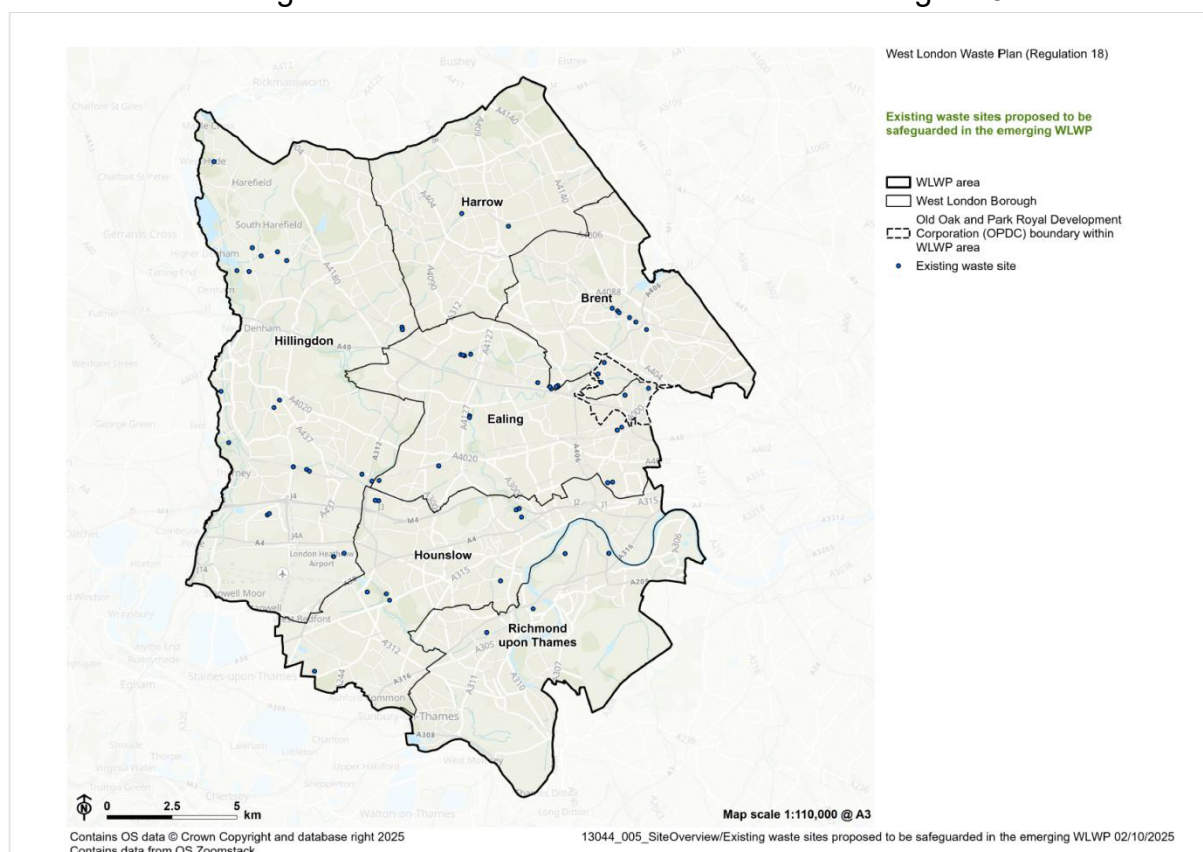
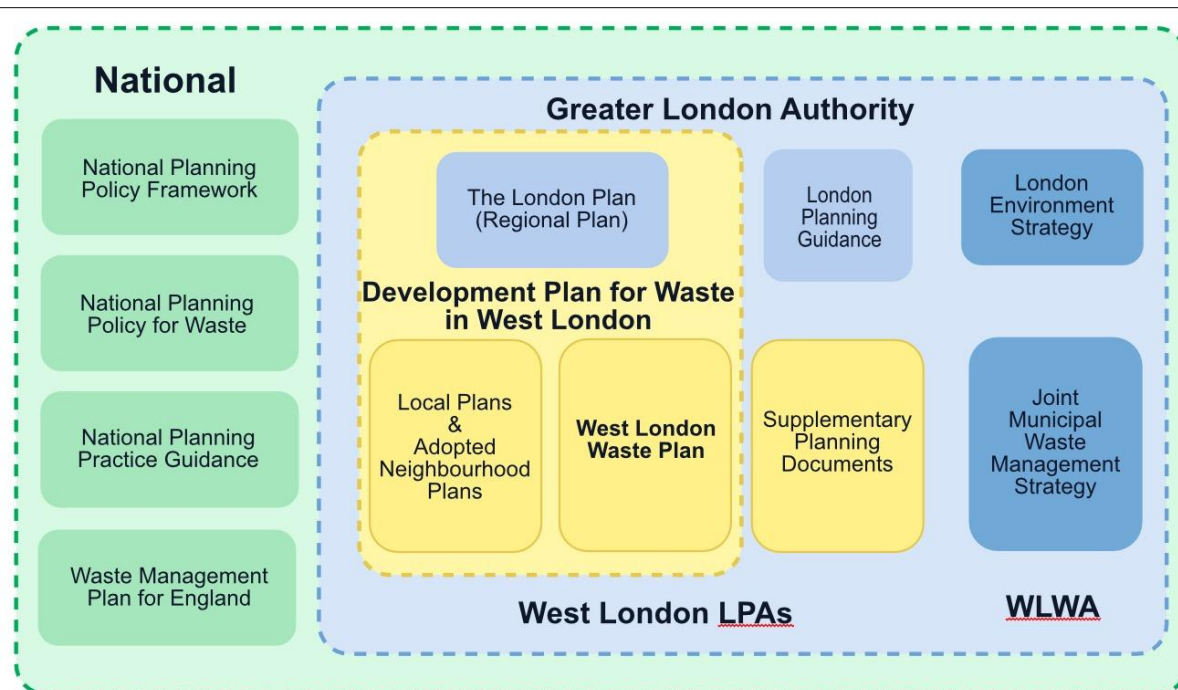


Figure 3: Map of West London Existing Waste Sites Proposed to be Safeguarded

## 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 waste<sup>14</sup> 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)<sup>15</sup>, associated Planning Practice Guidance<sup>16</sup> and the Resources and Waste Strategy for England 2018 (RWS)<sup>17</sup> 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 England<sup>18</sup> 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 requirement<sup>19</sup>.

<sup>14</sup> See *The Waste (England and Wales) Regulations 2011* and *The Waste (Circular Economy) (Amendment) Regulations 2020*

<sup>15</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/364759/141015\\_National\\_Planning\\_Policy\\_for\\_Waste.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)

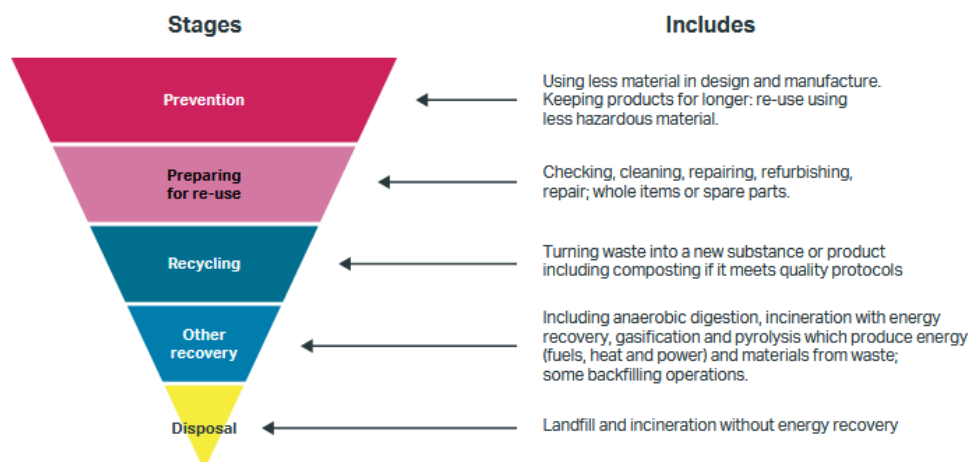
<sup>16</sup> <https://www.gov.uk/guidance/waste>

<sup>17</sup> <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>

<sup>18</sup> <https://www.gov.uk/government/publications/waste-management-plan-for-england-2021>

<sup>19</sup> 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.

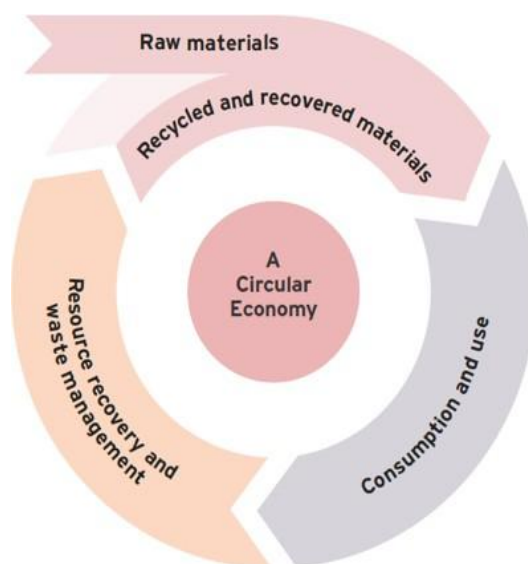


Figure 6: Circular Economy

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 2023<sup>20</sup> (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.

<sup>20</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1168372/environmental-improvement-plan-2023.pdf](https://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*<sup>21</sup>, 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 <sup>22</sup> 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%.

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<sup>21</sup> *The Environmental Targets (Residual Waste) (England) Regulations 2023*  
<https://www.legislation.gov.uk/en/uksi/2023/92/made>

<sup>22</sup> 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'<sup>23</sup>. 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 2021<sup>24</sup> 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.<sup>25</sup>

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<sup>23</sup> <https://www.gov.uk/government/publications/waste-prevention-programme-for-england-maximising-resources-minimising-waste>

<sup>24</sup> <https://www.gov.uk/government/publications/national-modeldesign-code>

<sup>25</sup> 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 Paper<sup>26</sup> 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.

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<sup>26</sup> 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
<b>Brent</b>	259,000	412,000	274,000	437,000
<b>Ealing</b>	291,000	542,000	306,000	576,000
<b>Harrow</b>	188,000	160,000	205,000	170,000
<b>Hillingdon</b>	347,000	423,000	365,000	449,000
<b>Hounslow</b>	260,000	407,000	275,000	432,000
<b>Richmond upon Thames</b>	179,000	148,000	190,000	157,000
<b>Total</b>	<b>1,524,000</b>	<b>2,092,000</b>	<b>1,615,000</b>	<b>2,221,000</b>

- 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 report<sup>27</sup>.
- 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.<sup>28</sup>

<sup>27</sup> ‘Identification of Strategically Significant Cross Boundary Waste Movements from West London’, BPP Consulting, October 2025

<sup>28</sup> 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.<sup>29</sup>

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<sup>29</sup> *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 Waste<sup>30</sup>, 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.

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<sup>30</sup> <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 study<sup>31</sup> 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 HIC<sup>32</sup> 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
<b>Difference</b>	<b>+715,589</b>	<b>+584,432</b>

### 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.

<sup>31</sup> West London Waste Plan, *Assessment of Existing Waste Management Capacity*, BPP Consulting, October 2025

<sup>32</sup> 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 Plan<sup>33</sup> 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).<sup>34</sup>
- 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

<sup>33</sup> Paragraph 9.8.6, London Plan 2021

<sup>34</sup> 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 report<sup>35</sup>. 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
<b>Hounslow</b>	Unit 8 Initial Washrooms (Brentford) Service Centre,	Waste transfer	2,156	0	1,094
<b>OPDC</b>	Atlas Wharf, Atlas Road		0	65,382	0
<b>OPDC</b>	Quattro, Victoria Road	Waste transfer	0	0	0
<b>Brent</b>	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
<b>Totals</b>			<b>18,646</b>	<b>209,359</b>	<b>1,094</b>

<sup>35</sup> *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 reprovision 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 period<sup>36</sup>, 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

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<sup>36</sup> 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 Assessment<sup>37</sup>.

- 9.9 Proposals to develop a safeguarded waste site for waste management uses

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<sup>37</sup> 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 <sup>42</sup>.

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.

<sup>38</sup> 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 assessment<sup>39</sup> 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 use<sup>40</sup> 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

<sup>39</sup> See *West London Waste Capacity Assessment*, 2025, BPP Consulting

<sup>40</sup> 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 legislation<sup>41</sup> 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**

<sup>41</sup> *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 as 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' status<sup>42</sup>. 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.

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<sup>42</sup> 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 CO<sub>2</sub> 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.<sup>43</sup>
- 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.

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<sup>43</sup> 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 landfill<sup>44</sup> 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

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<sup>44</sup> 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

<b>A</b>	
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>B</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.
<b>C</b>	
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.
<b>D</b>	
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

<b>E</b>	
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.
<b>G</b>	
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.
<b>H</b>	
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).

<b>L</b>	
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.

<b>M</b>	
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 <sup>2</sup> 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.
<b>N</b>	
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.
<b>O</b>	
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'.



<b>P</b>	
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.

<b>R</b>	
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.
<b>S</b>	
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
<b>T</b>	
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.
<b>W</b>	
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

## 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



### 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

### 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 Station<sup>45</sup>

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<sup>45</sup> 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 <sup>46</sup>	
B13	Alpertons Lane Waste Transfer Station	Sortera	Treatment	300,000	CDEW/HIC/Haz	Permanent Permission	2015	
B14	Brent Transfer Station, Alpertons 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	

<sup>46</sup> Site was previously permitted.

		Contractors Ltd						
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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 <sup>47</sup>	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

<sup>47</sup> 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 Alperton 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 <sup>48</sup>	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 <sup>49</sup>	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	

<sup>48</sup> Site provided as compensatory capacity for release of B02. Total capacity 150,000tpa.

<sup>49</sup> 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 Waye 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.



## MINOR PROPERTY TRANSACTION: *ACADEMY LEASE, PINN RIVER SCHOOL, EASTCOTE*

<b>Cabinet Member &amp; Portfolio</b>	Cllr Susan O'Brien - Cabinet Member for Children, Families and Education Cllr Jonathan Bianco - Cabinet Member for Corporate Services & Property
<b>Responsible Officer</b>	Julie Kelly – Corporate Director Children Services Dan Kennedy – Corporate Director of Residents Services
<b>Report Author &amp; Directorate</b>	Gary Binstead - Education & SEND and Andrew Low - Residents Services
<b>Papers with report</b>	Appendix 1 and 2 site plans

### HEADLINES

<b>Summary</b>	Pinn River School is a new 180-place all-through Free School for pupils with SLD/PMLD, funded and delivered by the DfE due to open in January 2026. It replaces Grangewood School within The Eden Academy Trust, which was demolished to accommodate the new provision. It is proposed that the Council: 1. <b>Grants a 125-year lease</b> on standard terms for the new Free School.
<b>Putting our Residents First</b>  <b>Delivering on the Council Strategy 2022-2026</b>	This report supports our ambition for residents / the Council of: An efficient, well-run, digital-enabled council working with partners to deliver services to improve the lives of all our residents  This report supports our commitments to residents of: Thriving, Healthy Households
<b>Financial Cost</b>	The creation of Pinn River increases capacity for special schools in the borough which will be in keeping with the strategy for achieving a balanced in-year DSG budget by FY2028-29.
<b>Select Committee</b>	Children, Families & Education
<b>Ward(s)</b>	Eastcote

## RECOMMENDATION

**That a 125-year lease on standard terms for the new Free School Pinn River be agreed with the Eden Academy Trust, as set out in the report and site plan, subject to DfE approval for the formal closure of Grangewood School and the opening of Pinn River.**

### Reasons for recommendation

Pinn River School is a new all-through Free School, offering 180 places. The successful application for the school was submitted by the Eden Academy Trust in 2012 and the project is being funded and delivered by the Department for Education (DfE). It replaces the former Grangewood School, which was demolished to make way for the new, expanded provision. Subject to DfE approval for the formal closure of Grangewood School and the opening of Pinn River, the school will serve children and young people with severe and profound learning difficulties (SLD/PMLD) and is a key project in creating additional special school places in Hillingdon.

- **DfE Requirement** - The DfE requires a 125-year lease from January 2026 and Insuring as standard for Free Schools to ensure long-term security and viability of the site.
- **Retention of Public Ownership** - A lease arrangement allows the local authority to retain ownership of the land while enabling the school to operate independently, thereby protecting the public asset.
- **Support for Capital Investment** - The DfE is making a significant capital investment in the development of Pinn River School. A long-term lease ensures the site remains dedicated to educational use, justifying the investment.
- **Operational and Strategic Stability** - A 125-year lease provides the Eden Academy Trust with the stability needed for long-term planning, recruitment, and service delivery.
- **Compliance with Legal and Funding Frameworks** - The lease term aligns with legal and funding frameworks governing Free Schools, ensuring compliance and facilitating smooth project delivery.

To facilitate the delivery of the new free school, the boiler room as shown in blue area of land illustrated in Appendix 1 within the existing lease between London Borough of Hillingdon and The Eden Academy dated 2012 was surrendered and terms thereof simultaneously varied to reflect the omission of the blue land which is now included within the free school as illustrated in Appendix 2.

The new lease supports the delivery of Hillingdon's SEND and Alternative Provision Sufficiency Strategy (2025–2030), which aims to expand specialist provision and meet rising demand locally. The strategy outlines plans to create over 700 new SEND places, reduce out-of-borough placements, and improve inclusion across mainstream and specialist settings. Pinn River School contributes directly to these priorities by increasing capacity and offering high-quality, local provision for children with complex needs.

## Alternative Options Considered

- a) Shorter Lease Term (e.g. 99 Years) - While still offering long-term tenure, a shorter lease may not meet DfE expectations and could lead to delays in project approval or funding. It introduces a risk that the site may not be considered sufficiently secure for the scale of investment, potentially requiring additional negotiation or legal variation. This option is therefore less favourable in terms of compliance and delivery certainty.
- b) Freehold Transfer - This option would involve transferring full ownership of the site to the academy trust. While it simplifies tenure, it results in the permanent loss of a public asset. The DfE generally discourages freehold transfers for Free Schools unless there are exceptional circumstances. It may also trigger legal and financial complexities, including potential clawback provisions if the site is no longer used for educational purposes.
- c) Assignment of the existing lease to the Eden Academy Trust but this would not give the 125 year term required as there is only 112 years left unexpired on the existing lease.

## Select Committee comments

None at this stage.

## SUPPORTING INFORMATION

### Background

1. Grangewood School a specialist academy for primary aged pupils with severe and profound learning difficulties was located on the Fore Street, Eastcote. The school joined The Eden Academy Trust in 2012 and currently has a lease with the Local Authority for 125 years.
2. The site is now being redeveloped to accommodate Pinn River School, a new 180-place all-through Free School with SLD/PMLD needs.
3. The redevelopment is being delivered by the Department for Education (DfE) in partnership with Kier Construction, and is designed to provide a modern, inclusive learning environment tailored to the needs of children and young people with complex SEND.
4. The Fore Street location was selected due to its existing educational use, proximity to local services, and suitability for expansion. The site will continue to serve the community as a dedicated specialist education facility under the Eden Academy Trust.
5. The school site is situated within the London Borough of Hillingdon adjacent to Ruislip Woods National Nature Reserve and adjacent to Coteford Junior School (part of the Partnership Learning Trust), which remains operational.
6. During discussions with the DfE, it was requested for the boiler house, situated within the Coteford Junior School boundary to be relocated in order for the floor space to be incorporated within the school. This was agreed by both Trusts.

## Free School Academy Lease

7. The template free school academy lease includes the following main terms:
- The annual rent is to be a peppercorn for the duration of the term and on a full repairing terms.
  - The site must be used solely for educational purposes, including ancillary activities such as community engagement, recreation, and fundraising.
  - The academy trust is responsible for keeping the property clean, safe, and in good repair.
  - The landlord may enter the site to carry out repairs in cases of persistent breaches that pose safety risks, with costs recoverable from the tenant.
  - Structural or external changes require landlord consent, which cannot be unreasonably withheld.
  - Initial development works are typically covered by a separate agreement; future changes are subject to lease terms.
  - Subletting or transferring the lease is restricted and requires prior approval to ensure the site remains under the control of the approved academy trust.
  - If the school ceases to operate or breaches key terms, the lease may be terminated and the site reverts to the landlord.
  - Clauses are included to safeguard the capital investment made by the Secretary of State, particularly in cases of closure or change of use.

## Financial Implications

- The creation of Pinn River increases capacity for special schools in the borough which will be in keeping with the strategy for achieving a balanced in-year DSG budget by FY2028-29.
- Increased capacity in our special schools reduces the incidence of placements in more expensive independent settings. Currently any placement where an independent provision is avoided results in a cost avoidance of £24k per annum on average.
- With Pinn River set to reach a capacity of 180 places, there is a possibility of an annual cost avoidance of £1.2m should the additional 49 places created be filled by pupils who would have otherwise gone to independent placements.

## RESIDENT BENEFIT & CONSULTATION

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

Granting a 125-year lease to Pinn River Free School will deliver significant long-term benefits to the local community and aligns with the strategic objectives of the Safety Valve Agreement for Hillingdon:

- The school will provide high-quality, tailored education for children and young people with severe and profound learning difficulties (SLD/PMLD), addressing a growing local need and helping to reduce reliance on costly out-of-borough placements.

- The long lease ensures the site remains dedicated to specialist education for generations, offering stability for families and service users, and supporting sustainable SEND planning under the Safety Valve programme.
- The redevelopment will deliver modern, purpose-built facilities, improving the learning environment and supporting better outcomes for pupils, in line with Hillingdon's commitment to improving local SEND infrastructure.
- The school will offer opportunities for inclusive activities, partnerships, and engagement with local residents and organisations, fostering a sense of belonging and shared purpose.
- Local provision reduces travel time for families, enabling better access to wraparound services and support networks, and contributing to improved wellbeing and educational continuity.

### **Consultation & Engagement carried out (or required)**

No public consultation required.

### **Conclusion**

It is recommended that Cabinet approve the granting of a 125-year lease on standard terms for the new Free School, Pinn River, to the Eden Academy Trust. This approval is subject to confirmation from the Department for Education regarding the formal closure of Grangewood School and the opening of Pinn River. The proposal supports the strategic objective of ensuring sufficient and suitable school places for children and young people with special educational needs and disabilities (SEND) in Hillingdon.

## **CORPORATE CONSIDERATIONS**

### **Corporate Finance**

Corporate Finance have reviewed this report and concur with the Financial Implications set out above, noting approval is sought for granting a 125-year lease on standard terms to the Eden Academy Trust for the new Free School, Pinn River, subject to DfE approval for the formal closure of Grangewood School and the opening of Pinn River.

Furthermore, it is noted that the creation of Pinn River increases local special school capacity and supports the strategy to achieve a balanced in year DSG budget by 2028/29. The additional 49 places has a potential cost avoidance of up to £1.2m annually, if fully utilised by pupils who would have been placed into independent placements.

### **Legal**

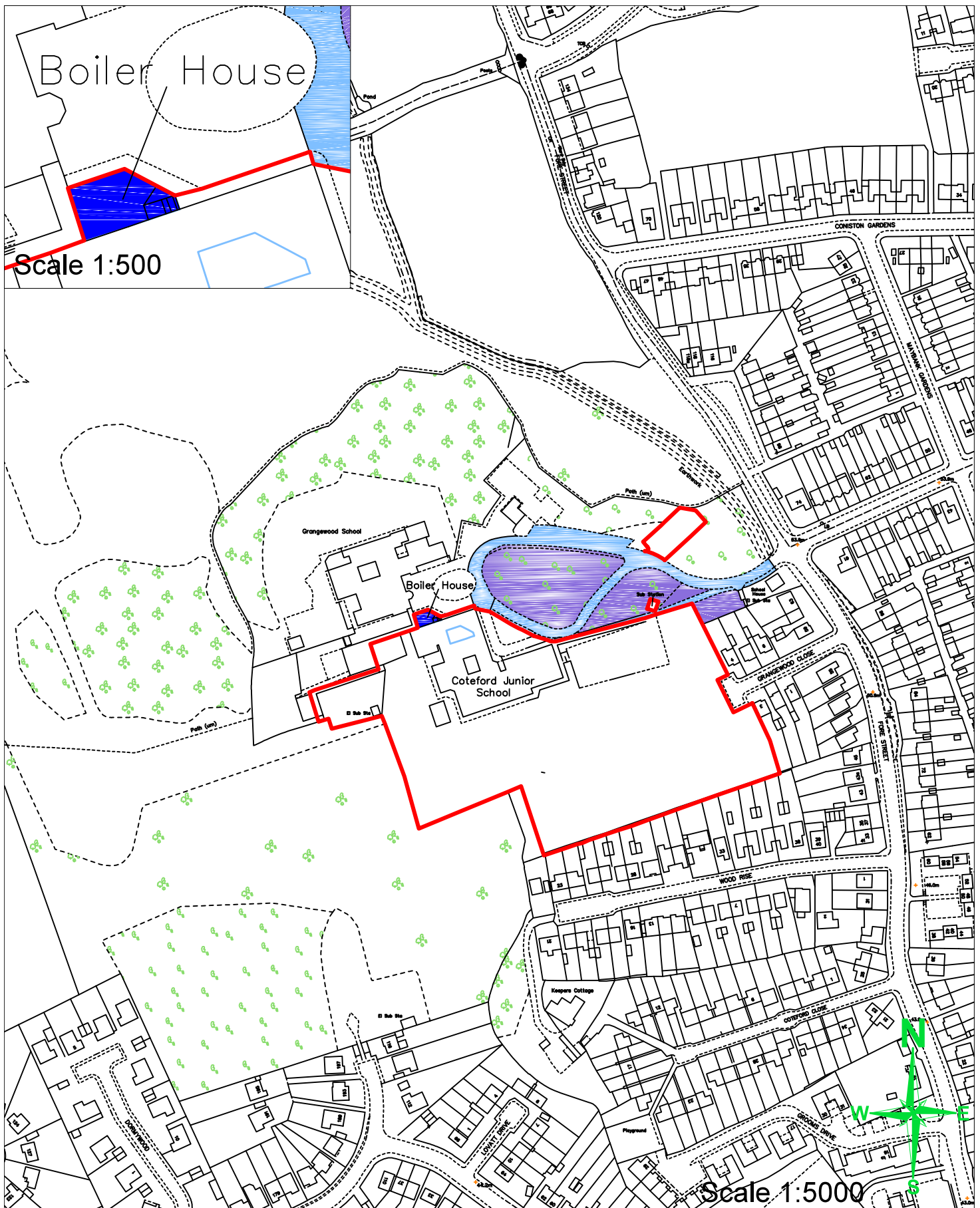
The Council will be entering into a new lease with the tenant in question. The lease will set out the obligations and rights to be accepted by the tenant and the obligations and rights the Council will accept as landlord. In the event of any disputes, regard will be given to the lease in question to determine what rights exist in respect of either party.

Legal relationships will be created by virtue of this lease and thus any future dealings with the tenant in question in respect of the property will be regulated by such lease. Legal Services confirm there are no legal impediments in the Council agreeing the recommendation.



## BACKGROUND PAPERS

NIL



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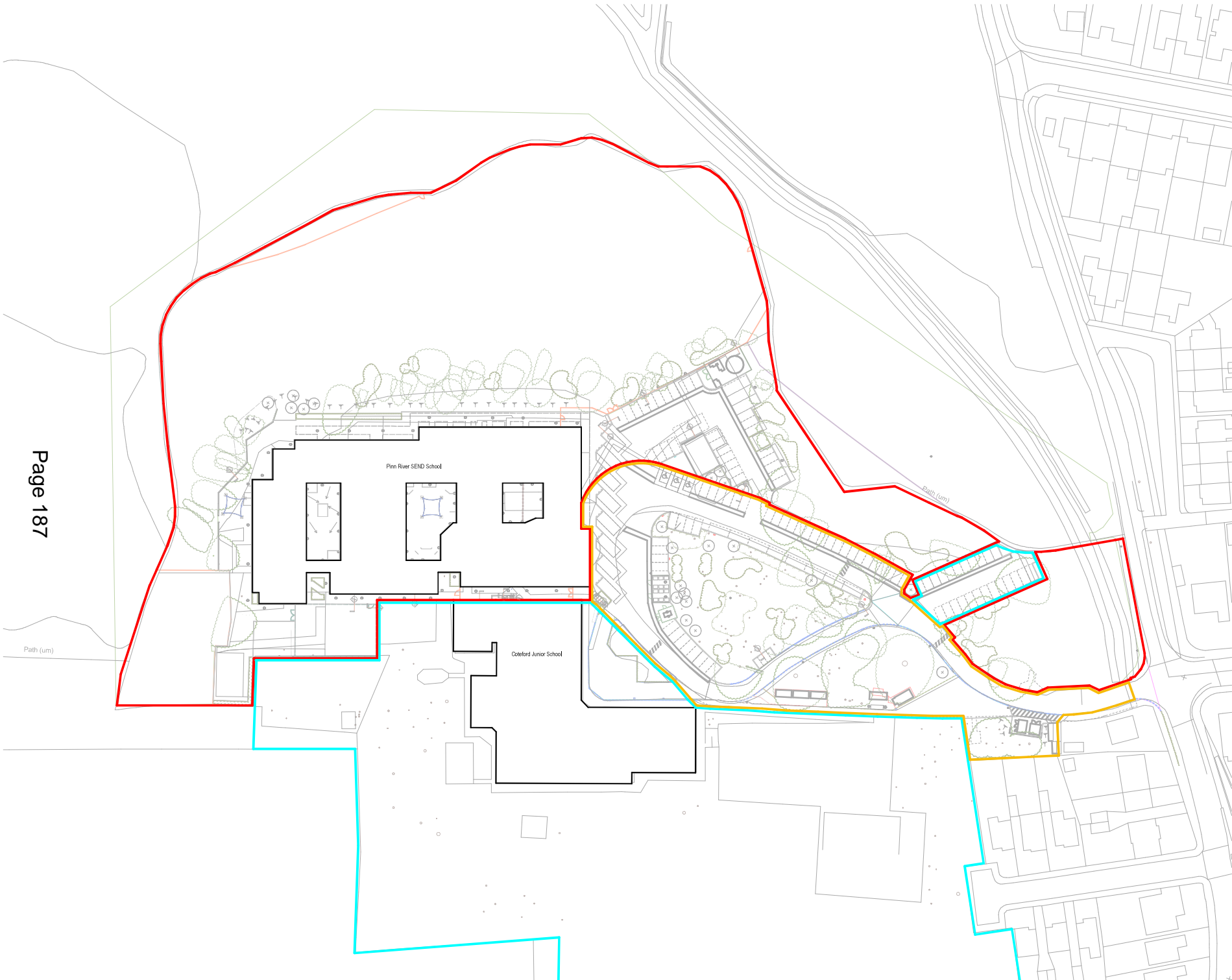


PROPERTY SERVICES  
CIVIC CENTRE,  
HIGH STREET  
UXBRIDGE,  
MIDDLESEX,  
UB8 1UW

TITLE  
**Coleford Junior School**  
Fore Street  
Eastcote HA5 2HX  
**Boiler House - Surrendered area**  
Page 185

DRG No	<b>GEN 1056/4</b>
SCALE	<b>1:500 &amp; 1:5000 @ A4</b>
DATE	<b>11/09/2023</b>

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Notes:

- Pinn River SEND School
- Coleford Junior School
- London Borough of Hillingdon

Scale 1:6 500

0 5 10 25 Metres

Assessments

No.	Description	Date	Issued by
PD2	Issue to Site	2025-09-22	FR
PD2	Issue to Site	2025-09-08	FR

Use figured dimensions only. All levels and dimensions to be checked on site. This drawing is to be read in conjunction with all other relevant drawings and specifications. CH2000 Limited. All rights reserved.

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Project Name  
**Pinn River SEND School**

Design Reference  
**Stakeholder Lease Plan**

Drawn: FR Checked: NM  
Scale: 1:500 @ A1 Project Issue Date: Sep 2022

Project	Originator	Volume	Level	Type	Rate	Number
<b>FS0728 - NOV - 02 - 00 - DR - A - 02002</b>						

Status	Submittal Description	Orig Paper Size
S2	For Information	A1
Revision	Revision Description	Novium Job No
PD2	For Information	28575

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## COUNCIL BUDGET - 2025/26 BUDGET MONITORING

<b>Cabinet Member &amp; Portfolio</b>	Councillor Eddie Lavery Cabinet Member for Finance & Transformation
<b>Responsible Officer</b>	Steve Muldoon, Corporate Director of Finance
<b>Report Author &amp; Directorate</b>	Andy Goodwin, Head of Strategic Finance
<b>Papers with report</b>	None

### HEADLINES

#### Overview

This report sets out a summary of the Council's General Fund and Housing Revenue Account forecast positions for both revenue and capital budgets as at the end of September 2025 (Period 6) for the financial year 2025/26.

#### General Fund Revenue

The Council has an approved expenditure budget of £974m, comprised of £552m within the General Fund and £422m within the Dedicated Schools Grant. As at the end of September 2025 (Period 6), the General Fund forecast shows an overspend of £36.0m, leading to an adverse movement of £5.8m from Month 5 against the General Reserves position.

The aggregate year to date forecast overspend represents a variance predominantly driven by service operations and reflects the ongoing pressures and risks local authorities face in homelessness, children's and adults social care provision, as well as challenges in the delivery of savings in year, whilst the changes from Month 6 are largely comprised of changes to the assumptions of expenditure to be funded by the flexible use of capital receipts. There remain significant inherent risks which continue to be reviewed and may impact the forecast at a future point.

#### Dedicated Schools Grant (DSG)

The in-year forecast deficit relating to DSG remains in line with budget, i.e. a £12.5m in-year increase in the deficit reserve position. It should be noted that the in-year deficit for 2025/26 represents an improvement of £2.5m on the in-year deficit reported for 2024/25. When factoring in the opening deficit position of £65.9m, this forecast position leads to a closing cumulative deficit for 2025/26 of £78.4m. The statutory override is in place until March 2028 while the Council continues with its deficit management plan.

#### Housing Revenue Account (HRA)

The 2025/26 HRA revenue budget consists of £85.4m expenditure matched by an equivalent level of income (rents, service charges and other contributions). The Month 6 forecast reflects an unchanged position (nil variance) against this budget. This comprises a £1.3m pressure against service expenditure offset by a reduction in the revenue contribution to the capital programme.

## General Fund and HRA Capital Programmes

The Council set itself ambitious targets to invest in local services, infrastructure and homes during 2025/26 – a total of £357.5m being budgeted across both the General Fund and HRA areas in 2025/26. 83% of that target is expected to be spent in year, with the majority of the underspend potentially rephased into 2026/27 at this stage, subject to further review as part of the 2026/27 budget setting process and Cabinet approval as part of the draft outturn report in early 2026/27.

The General Fund capital programme budget includes £17.0m of capital receipts to be used to fund transformation costs leading to ongoing future revenue savings or cost avoidance through the flexible use of capital receipts mechanism as allowed for under Government regulation. The level of available capital receipts and how this will be applied to qualifying expenditure in this year has been reviewed with reductions factored into the Month 6 update.

<b>Putting our Residents First</b>  <b>Delivering on the Council Strategy 2022-2026</b>	This report supports our ambition for residents / the Council of: An efficient, well-run, digital-enabled council working with partners to deliver services to improve the lives of all our residents  This report supports our commitments to residents of: A Digital-Enabled, Modern, Well-Run Council
<b>Financial Cost</b>	N/A
<b>Select Committee</b>	Corporate Resources & Infrastructure
<b>Ward(s)</b>	All

## RECOMMENDATIONS

That:

1. the revenue and capital budget monitoring positions and treasury management update as at September 2025 (Month 6) as set out in Part A of the report be noted, furthermore, the actions proposed by officers be noted.
2. the financial recommendations as set out in Part B of this report be approved.

### Reasons for recommendation

1. The reason for **Recommendation 1** is to measure performance against the Council's budgetary objectives, providing Cabinet with the update on performance against budgets approved by Council on 27 February 2025 contained within **Part A** of this report. An update on the Council's Treasury Management activities is included within this.
2. **Recommendation 2** seeks approval for the financial recommendations set out within **Part B** of this report, which may include acceptance of grant funding, revisions to fees & charges and ratification of decisions taken under special urgency provisions.

### Alternative options considered / risk management

3. There are no other options proposed for consideration.

## Select Committee comments

None at this stage.

# PART A: 2025/26 MONTHLY BUDGET MONITORING

## SUMMARY

### GENERAL FUND REVENUE

4. As at Month 6, the Council is forecasting a net overspend of £36.0m on its core operating activities. This includes overspends of £27.1m across Service Operating Budgets, a £4.2m pressure against the budgeted use of reserves and a £6.7m pressure across centralised and Corporate Budgets including Corporate Funding. These pressures are partially mitigated by £2.0m of planned interventions, which are expected to deliver savings aligned with the Target Operating Model (TOM), spend control measures and other mitigations. For Month 6, it is recommended that Cabinet approve a budget virement of £8.8m from General Contingency to permanently fund underlying budget issues including Adult Social Care demand and the pay award shortfall, leaving £1.7m of the funds to offset the overall position. The update presented in this report is based on the position after this virement is actioned.
5. The service operating budget pressure of £27.1m, represents an underlying £4.7m adverse movement from Month 5, but the General Contingency virement of £5.6m in this area reduces this to a £0.9m favourable movement from Month 5. The pressure against Service Operating Budgets is largely being driven by four pressure areas:
  - i. c£13.5m relating to further demand pressures above the budget position presented to February Cabinet and Council, with £3.2m being driven by Adult Social Care demand (after the £5.6m budget virement), £6.5m from homelessness support, £4.6m within Children's Social Care, offset by a £0.6m reduction in the waste forecast.
  - ii. c£7.9m relates to a shortfall against the savings budgeted in 2025/26 and the £38.8m target to be delivered this year (with a further £7.1m included in unallocated savings budgets), representing 34% slippage.
  - iii. c£2.3m from the General Fund share of Treasury activities and the interest costs arising from the increase in borrowing resulting from the forecast
  - iv. Lastly, c£3.4m net overspend relating to a number of other smaller updates, with a shortfall against the capital receipts target leading to some transformation activity now being funded from revenue, alongside further pressures from the use of agency staff, offset by staffing underspends across SEND Transport of c£1.0m Adult Social Care & Health (c£0.8m) and other minor movements.
6. Within centralised and Corporate Budgets, a forecast overspend of £6.7m is presented, which includes a pressure of £7.1m from an under-delivery against unallocated savings. A further pressure of £1.3m is reported against Corporate Funding due to the Children's Prevention Grant that was announced as part of Core Spending Power needing to be spent on new

initiatives leading to the grant being transferred to the Children's Social Care service. The forecast then includes two mitigations, firstly the remaining £1.7m general contingency and secondly £2.0m of interventions to incorporate an anticipated reduction in expenditure as a consequence of introducing more stringent spend controls.

7. Within the position, the planned use of reserves of £4.2m will not proceed due to the Council's low balance of opening reserves
8. As part of the Month 6 review, the Council has carried out an analysis of exposure to risks and where further opportunities exist. This review has identified more risks than opportunities, with risks totalling £6.9m against further opportunities of £2.3m. The identified risks include demand exposure from homelessness (£0.8m), adult social care (£1.8m) and Waste Services (£0.3m) with wider corporate risks linked to the delivery of the interventions (£1.0m). The level of risk has reduced at Month 6 as the risk associated with the level of capital receipts used to fund transformation activity has now been incorporated into the forecast. The remaining risks come from a number of smaller updates including funding strategies such as buyers premium and potential environmental costs associated with compliance related activities. It should be noted that risks not able to be quantified include the cost of any redundancies that may arise from any TOM savings implementation (redundancies would precede any savings that ensue), and also the financial impact relating to the amortisation of any EFS that may get agreed in respect of the 2024/25 financial year.
9. Opportunities in this position include £1.3m related to the Council's ability to positively impact the homelessness support pressure through demand and market management, maximising available funding sources, reducing energy costs and potential upsides from fees and charges.
10. It should be noted that the risk of further overspend against homelessness costs remains high, like many London boroughs, given the rising levels of homeless presentations and the challenges in securing suitable alternative accommodation to prevent homelessness, particularly in the private rented sector. This position is being reviewed in detail and updates will be provided in future budget monitoring reports.
11. Within the £1.0m homelessness demand risk, it is worth noting that the Council is seeing exceptional costs as a result of being a port authority. This includes the arrival of UK nationals, which remains an unknown quantum at this time, given the costs incurred by the Council are not fully funded by the Government. The Council's forecast is based on the current run rate to date. It should be noted that a review commissioned by London Councils has identified a "Funding Gap" of £740m for London Councils between homelessness costs incurred and funding provided by Central Government in 2024/25.

**Table 1: General Fund Overview**

Service	Approved Budget £m	Forecast Outturn £m	Variance £m	Forecast Variance Prior Month £m	Change in Variance £m
Service Operating Budgets	272.2	299.3	27.1	28.0	(0.9)
Development & Risk Contingency	1.7	0.0	(1.7)	(10.5)	8.8
Unallocated Budget Items: Pay Award Inflation	0.0	0.0	0.0	2.7	(2.7)
Unallocated Budget Items: Unallocated Savings	(7.1)	0.0	7.1	7.1	0.0
Budgeted Use of Reserves	(4.2)	0.0	4.2	4.2	0.0
<b>Total Net Expenditure</b>	<b>262.6</b>	<b>299.3</b>	<b>36.7</b>	<b>31.5</b>	<b>5.2</b>
Corporate Funding	(262.6)	(261.3)	1.3	0.7	0.6
<b>Subtotal</b>	<b>0.0</b>	<b>38.0</b>	<b>38.0</b>	<b>32.2</b>	<b>5.8</b>
Interventions	0.0	(2.0)	(2.0)	(2.0)	0.0
<b>Net Total</b>	<b>0.0</b>	<b>36.0</b>	<b>36.0</b>	<b>30.2</b>	<b>5.8</b>

<b>Opening General Reserve</b>		<b>1.5</b>	<b>1.5</b>	<b>0.0</b>
Less: Underlying Variance		(36.0)	(30.2)	5.8
<b>Closing General Reserve</b>		<b>(34.5)</b>	<b>(28.7)</b>	<b>5.8</b>

<b>Opening Controllable Earmarked Reserves</b>		<b>5.2</b>	<b>5.2</b>	<b>0.0</b>
Use of Controllable Earmarked Reserves		(2.0)	(1.4)	0.6
<b>Closing Controllable Earmarked Reserves</b>		<b>3.2</b>	<b>3.8</b>	<b>0.6</b>

12. The Council's unaudited opening reserves position, comprising both General and Controllable Earmarked Reserves, stands at £1.5m of General Reserves and £5.2m of Earmarked Reserves. In arriving at the net £36.0m overspend projected above, the forecast assumes a £2.0m drawdown from Earmarked Reserves to support service-level requirements, bringing the forecast usable General Reserve position to £34.5m overdrawn whilst Controllable Earmarked Reserves are forecast to close at £3.2m. This is stated before any potential impact from other financial risks which are not currently built into the forecast. It is clearly untenable for the Council to leave this position unaddressed.
13. To this end, the Council is engaged in conversations with the Ministry for Housing, Communities & Local Government (MHCLG) with a view to securing Exceptional Financial Support (EFS), and in order to progress matters has already made a formal submission to MHCLG for support in the form of a capitalisation direction and additional grant funding.
14. Exceptional Financial Support may be granted by the Ministry of Housing, Communities and Local Government (MHCLG) to councils facing significant financial pressures and unable to deliver a balanced budget or maintain adequate reserves. Support can be provided in one or more of the following forms:
  - i. Capitalisation Direction – This permits a council to account for its revenue overspend as capital, subject to Government approval. Without such approval, this approach



would be unlawful. Once approved, this capital item can be addressed either through offsetting capital receipts or amortised as MRP over a maximum of twenty years. If a council were to have to borrow to make the cash flow balance this would also incur interest costs.

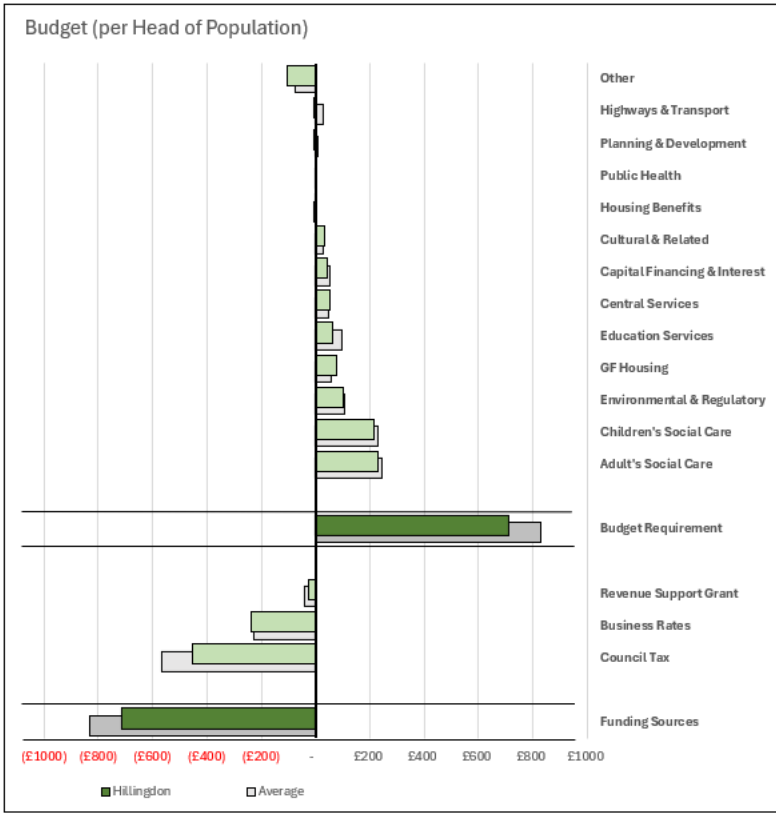
- ii. Additional Grant Funding – In certain circumstances, a council may receive direct grant support to help manage exceptional financial pressures.
- iii. Council Tax Flexibility – A council may be granted permission to raise Council Tax above the referendum threshold without holding a referendum. This option is only available as part of the annual Council Tax setting process.

15. The S151 Officer remains of the view that he is not minded to issue a S114 notice at this point in time on the basis that MHCLG are engaged in substantive discussions and reviewing the Council's position. There remains a reasonable likelihood that EFS can be approved within an appropriate timeline. This position is held on the current assumption that MHCLG will support the Council's application for EFS and that the level of EFS agreed will be seen through on time and to the level required by the Council. The decision not to issue a S114 at this time is wholly contingent on the discussions with MHCLG and ultimately without reassurance and progress of substance in these discussions very serious consideration would need to be given to issuing such a notice. Under S114(3) legislation, consideration needs to be given to whether the expenditure of the Council in a financial year (i.e. 2025/26) will exceed the resources (including sums borrowed) available to it to meet that expenditure. This condition will be satisfied through the agreement of EFS, for which there is currently a reasonable likelihood. MHCLG agreement to EFS will come with certain conditions that demonstrate to the Ministry that the Council is taking the necessary steps to address the situation. These would include, but are not limited to, ongoing engagement with MHCLG officials and representatives, working towards implementing the "Section 24" recommendations of the auditor, utilising peer support and advice from outside the authority, and potentially an additional external assurance review. These steps mentioned are already underway to ensure that the Council is heeding the advice and expectations to facilitate the agreement to EFS.
16. The Council is actively reviewing all available options to address the current financial pressure and the forecast negative reserves position. Central to this is the delivery of the 2025/26 savings programme, totalling £34.0m. In addition, £4.8m of unresolved savings from previous years have been carried forward, increasing the total savings requirement for 2025/26 to £38.8m. To date, slippage of £13.0m has been identified within this savings requirement and built into the forecast position.
17. Under Government guidance, councils may fund transformation activity using capital receipts from asset disposals. Given the scale of the savings programme, it is likely that the Council will need to utilise all available capital receipts to support transformation. The Council is reviewing the pipeline of assets which can be targeted with a view to delivering capital receipts in this financial year. Any receipts will need to be verified to assure that they qualify under the regulations pertaining to flexible capital receipts. A view has now been formed of the extent of qualifying receipts that can be achieved and be put towards qualifying expenditure. As a

consequence of this, the level of expenditure set to be funded in this way has been reduced, leading to a c£4m impact on the revenue forecast. The Council has a level of capital receipts brought forward from previous years which, along with known 2025/26 disposals, will be able to fund the residual requirement. There is no further risk now anticipated from this updated position.

18. The Council remains firmly committed to achieving a sustainable financial position. It continues to be run efficiently, with spend per capita on frontline services below that of comparable authorities, primarily Outer London boroughs. Despite the financial pressures, the Council has consistently delivered high-quality, well-regarded services in a cost-effective manner, while maintaining one of the lowest Council Tax levels in its comparator group. The chart below, based on 2023/24 data, illustrates this position:

**Chart 1: Income & Spend per Head Compared to Cohort Average**



19. The Council’s forecast of overdrawn reserves by year-end reflects a range of national challenges, compounded by insufficient funding from central government to meet rising demand. A key pressure continues to be the delivery of temporary accommodation and homelessness support. This is particularly acute in Hillingdon, due to the presence of Heathrow Airport - a major port of entry into the UK - which places additional strain on local housing supply and demand, driving up costs. This housing pressure also affects Children’s Social Care, where vulnerable young people in supported accommodation are unable to transition into independent tenancies due to a shortage of general needs housing. At the same time, demand for Adult Social Care remains consistently high following the pandemic, with funding from the Department of Health and Social Care failing to keep pace with increasing client demand volume and complexity and market pressures.

20. The Council is taking steps to address the rising cost of temporary accommodation by seeking to make acquisitions which can then be used to address the issue and mitigate the impact of high rental costs in the private sector. For this reason, Cabinet recently approved the forward phasing of future years' HRA capital budget alongside a virement of £20m from the General Fund capital programme to the HRA to support developments and acquisitions.
21. The Government has now closed its consultation on the Fair Funding Review 2.0 with the Council awaiting the outcome of the consultation. The fair funding review has been delayed since the pandemic, with the consultation covering the funding distribution formulae used by Government to allocate funds to each council across the country. Whilst the outcome of the review is still awaited, early modelling by both London Councils and Pixel indicate that Hillingdon should see a net growth in funding from 2026/27 and beyond. Whilst it is recognised that the borough was aware of the current level of Government funding at the time of setting the 2025/26 budget, the review indicates that Hillingdon has been significantly underfunded by Government over an extended period of time and had this review taken place in line with the original timescale, Hillingdon's financial position is likely to have been far more favourable.
22. Hillingdon's consultation response largely agreed with the Fair Funding Review 2.0 information and data that the Government shared, supported by the London Councils model. The Council's primary response was focused on the timing of the transition period, with the Government indicating transitioning to the new funding level over a 3-year period. The Council's stance is that residents should not be required to fund transitional arrangements and that the Government should seek alternative methods to fund any such arrangements, rather than restrain the release of funding due to Hillingdon.
23. The pressures presented in this report therefore present a challenge for the Council, with the above table setting out this position against service operating budgets, corporate budgets and the use of reserves. This forecast position does not include any potential outcome from the Exceptional Financial Support conversations being held with Government, likewise it does not reflect the revenue impact of any EFS which may be agreed in respect of 2024/25 and would begin to be amortised from 2025/26.
24. The Council's forecast position is therefore a highly challenging one and is highly dependent on the assumptions built into the forecast being deliverable. The contingency has been fully released in the forecast and so there is no capacity to offset further unforeseen costs, or savings or income shortfalls. It is of critical importance that all areas of the Council aim to deliver on, and give support to, all of the savings commitments made to ensure they are delivered on time and to the value and scale planned in the budget. Equally, it is important that any savings falling short are still pursued so that they can be delivered in full and on time in order to deliver the maximum benefit to 2026/27 and the MTFS.
25. The risks and upsides not encapsulated within the forecast will also need to be carefully reviewed and addressed in order to mitigate and prevent or limit the impact they may present. Any further impacts may have consequences for the EFS requirement and add pressure to the Council's finances in repaying this over time. The Council will have to continue to focus on identifying options to address these risks and not assume that the increase in funding

anticipated through the Fair Funding review, which may only be phased in over three years, will fully resolve the situation.

26. The Leader and his Cabinet have asked officers to do everything they can to address and mitigate the overspend and financial pressures faced. To this end, officers have been working on developing strict spend control processes across all areas of the Council, extending the existing controls over staffing costs to non-staff costs. This will bring with it a burden of administration but is essential to demonstrate that the Council is taking its fiduciary duties seriously. These measures are expected to bring a reduction in the level of non-essential expenditure as well as challenge to the scope of spend which is currently deemed to be statutory in nature. Consequently, an assumption has been made that this intervention could lead to a cost reduction of circa £2m in this financial year.
27. Alongside this, officers have been asked to review the capital expenditure programme to identify any schemes which can be deferred, reduced or stopped, in particular any which require Council borrowing in order to fund, or will be a drain on Council cash. This will in turn lead to a reduction in the level of borrowing required and hence the interest cost of such borrowing. In future years this would lead to a reduction in the level of Minimum Revenue Provision (MRP) arising from capital schemes and so help to mitigate the impact of MRP arising from Exceptional Financial Support. MRP is a charge that local authorities must set aside for the repayment of debt. The reduction in the capital forecast this quarter shows the first signs of the review work, and while some of this reduction is reflected as slippage, there will be a review of the programme of works as part of the 2026/27 budget setting process to establish which schemes will not progress.
28. Finally, it should be remembered that not all of the potential risks facing the Council this financial year have been quantified and built into the forecast. All efforts will be undertaken to minimise the impacts of these risks on the Council both in this and into future years.

## **GENERAL FUND CAPITAL EXPENDITURE**

29. The Council updates its capital forecasts on a quarterly basis, with Month 6 being the second update presented to Cabinet. A £43.4m underspend is projected on the 2025/26 General Fund Capital Programme of £138.4m, with the forecast outturn variance over the life of the 2025/26 to 2029/30 programme currently projected to bank in-year cost underspends of £4.8m. General Fund Capital Receipts of £17.0m were budgeted for 2025/26, with these funds planned to fund transformation activity. At Month 6, the use of capital receipts has reduced due to the DSG safety valve contributions currently being suspended (£4.0m) and a reduction in the Transformation Capitalisation forecast presented in the revenue update. Overall, Prudential Borrowing required to support the 2025/26 to 2029/30 General Fund capital programme remains on budget. These projections will be revisited as part of the Month 9 forecast as well as the 2026/27 budget setting process.

## **SCHOOLS BUDGET**

30. The Dedicated Schools Grant (DSG) total Block for the Maintained Schools is forecast to have an in-year deficit of £12.5m, unchanged from Month 5, representing an ongoing improvement from the draft outturn for 2024/25 of £15.0m as a result of a broad range of

positive measures deployed by the Council. The in-year deficit is largely driven by High Needs placement demand and cost pressures which continue to be significantly underfunded in the DSG settlement from the DfE. This position means that the cumulative deficit carried forward to 2026/27 is forecast at £78.4m.

31. There is currently a time-limited statutory override in place, now extended until 31 March 2028, ringfencing the Schools Budget deficit such that this does not impact upon general reserves. The Council is one of many local authorities managing a large deficit within the Schools Budget and this stood at £65.9m at 31 March 2025, exceeding the level of General Fund reserves held. It is worth noting that between outturn 2024/25 and the position presented in this report, the Council has successfully reduced the in-year spend against the Schools Budget by £2.5m and continues to make good progress in this.
32. The issue of mounting DSG deficits remains a national issue, with projections for a £6.2bn deficit across the country by 2026/27 forming a key strand to lobbying by sector bodies such as the LGA and London Councils. Were the Council faced with having to absorb the deficit into its own reserves from 1 April 2028, it would have no option other than to request a further increase in EFS. Given the national cumulative position indicated above, it is hard to see how this can be managed and so the proposed way forward from Government is keenly awaited by councils across the country.

## **HOUSING REVENUE ACCOUNT**

33. The Housing Revenue Account (HRA) continues to forecast a breakeven position at Month 6. Operating costs are showing an in-year pressure of £1.3m, an adverse movement of £0.4m, primarily driven by staffing costs, emergency B&B placements and leaseholder insurance premiums, with the adverse movement related to a shortfall in the forecast rental income. These pressures are offset by a reduction in the revenue contributions to the capital programme, ensuring the HRA remains financially viable. The 2025/26 closing HRA General Balance is forecast to be £15m, in line with the target level established for 2025/26. The HRA Capital Programme is forecast to breakeven over the five-year programme, with investment of £549.2m increasing housing supply and maintaining and improving existing stock.



## **FURTHER INFORMATION**

### **General Fund Revenue Budget**

34. As at Month 6, the Council's General Fund is reporting an overspend of £36.0m after allowing for the anticipated delivery of £2.0m in savings through interventions including tighter spend controls, and the remaining £1.7m contingency. This leads to an adverse movement in general and controllable earmarked reserves from Month 5 of £6.4m. This position includes a £13.0m shortfall against the total £38.8m savings target, and a reduction in the level of capital receipts being used to fund transformation activity.
35. The Month 6 position also includes the deployment of £2.0m from Earmarked Reserves, primarily to support insurance claims and homelessness related pressures. In addition, £1.2m is being drawn down from the Public Health ringfenced reserve, accumulated from prior year underspends against the Public Health Grant, with the £0.6m movement in month against Earmarked Reserves being wholly driven by the Public Health ringfenced reserve.
36. To support the delivery of the savings programme, the Council is utilising £5.7m of capital receipts to fund transformation costs, in line with Government guidance. Asset disposals in 2025/26 plus previously unspent capital receipts are expected to support this transformation activity in the current financial year.

### **Progress on Savings**

37. The savings requirement for 2025/26 is £34.0m as set out in the Council's budget strategy. This position has been supplemented by a further £4.8m of savings carried forward from 2024/25 as set out in the outturn report presented to July Cabinet, resulting in an overall programme of £38.8m savings being targeted in year:

**Table 2: Savings Tracker**

Directorate	Blue Banked £m	Green Delivery in progress £m	Amber I Initial stages of delivery £m	Amber II Potential problems in delivery £m	Red Serious problems in delivery £m	Savings to be Written Out £m	Total £m
Finance	(0.8)	0.0	0.0	0.0	(0.4)	0.0	<b>(1.2)</b>
Adult Services & Health	(3.1)	(0.7)	(0.6)	(0.1)	(3.8)	0.0	<b>(8.3)</b>
Children & Young People's Services	(2.9)	(1.4)	0.0	(0.3)	0.0	0.0	<b>(4.6)</b>
Place	(2.6)	(1.4)	(0.6)	(1.0)	(0.9)	(0.1)	<b>(6.6)</b>
Homes & Communities	(1.5)	(1.2)	(2.7)	(0.2)	(1.1)	(0.3)	<b>(7.0)</b>
Corporate Services	(2.0)	(1.0)	(0.1)	0.0	(0.4)	0.0	<b>(3.5)</b>
Chief Executive Office	0.0	0.0	(0.3)	(0.1)	0.0	0.0	<b>(0.4)</b>
Cross-Cutting	0.0	0.0	0.0	0.0	(5.7)	(1.5)	<b>(7.2)</b>
<b>Total 2025/26 Savings Programme</b>	<b>(12.9)</b> 33%	<b>(5.7)</b> 15%	<b>(4.3)</b> 11%	<b>(1.7)</b> 4%	<b>(12.3)</b> 32%	<b>(1.9)</b> 5%	<b>(38.8)</b> 100%
<b>Prior Month Change</b>	<b>(3.9)</b> 10%	<b>1.3</b> -3%	<b>4.5</b> -12%	<b>1.5</b> -4%	<b>(2.9)</b> 8%	<b>(0.5)</b> 1%	<b>(38.8)</b> 100%

38. As of Month 6, £18.6m (48%) of the savings and interventions are being recorded as banked or on track for delivery. A further £6.0m (15%), being tracked above as amber, are in delivery but may not deliver in full this financial year. Of this, £1.6m is currently anticipated to slip but deliver in 2026/27. There are £12.3m (32%) of savings reported as red and having challenges in delivery, with mitigations being sought in-year where feasible. Of these, £11.4m are forecast to slip into 2026/27 but are ultimately expected to be delivered. Thus, a total of £13.0m in savings is forecast to slip into 2026/27 and forms part of the overall forecast overspend. A further £1.9m of savings are considered to be undeliverable and will need to be written out of the Council's budget from 2026/27. Of these, £1.7m relate to the brought forward balance from the prior year while £0.2m of savings budgeted for delivery in 2025/26 can no longer be delivered.
39. Where savings are at risk of not being delivered in full during 2025/26, the associated pressures have been factored into the monitoring position with compensating actions being implemented where possible to offset the impact.

### Service Operating Budgets

40. Service Operating Budgets represent the majority of the Council's investment in day-to-day services for residents. With the Council continuing to operate in an environment driven by national pressures and exceptionally high demand, these budgets have been supplemented with £5.5m of funding to meet forecast inflationary pressures and £17.8m for demographic growth and other drivers impacting on demand for services.
41. Table 3.3 represents the position reported against normal activities for the Service Operating Budgets now being presented at Corporate Director level. The salient risks and variances within this position are summarised in the following paragraphs.

**Table 3: Service Operating Budgets**

Directorate		Approved Budget	Underlying Forecast	Earmarked Reserves	Provisions	Transformation Capitalisation	Forecast Outturn	Variance	Forecast Variance Prior Month	Change in Variance
		£'m	£'m	£'m	£'m	£'m	£'m	£'m	£'m	£'m
Finance	Expenditure	113.7	118.1	0.3	0.0	(0.6)	117.7	4.0	2.4	1.6
	Income	(79.7)	(78.3)	0.0	0.0	0.0	(78.3)	1.4	1.3	0.1
	<b>Subtotal</b>	<b>34.0</b>	<b>39.8</b>	<b>0.3</b>	<b>0.0</b>	<b>(0.6)</b>	<b>39.4</b>	<b>5.4</b>	<b>3.7</b>	<b>1.7</b>
Adult Social Care & Health	Expenditure	185.4	192.8	0.0	0.0	(0.1)	192.7	7.3	11.4	(4.1)
	Income	(84.2)	(85.2)	(1.3)	0.0	0.0	(86.5)	(2.3)	(1.5)	(0.8)
	<b>Subtotal</b>	<b>101.2</b>	<b>107.6</b>	<b>(1.3)</b>	<b>0.0</b>	<b>(0.1)</b>	<b>106.2</b>	<b>5.0</b>	<b>9.9</b>	<b>(4.9)</b>
Children & Young People Services	Expenditure	79.3	85.2	(0.4)	0.0	(0.7)	84.1	4.8	3.5	1.3
	Income	(22.2)	(20.9)	(0.1)	0.0	0.0	(21.0)	1.2	0.6	0.6
	<b>Subtotal</b>	<b>57.1</b>	<b>64.3</b>	<b>(0.5)</b>	<b>0.0</b>	<b>(0.7)</b>	<b>63.1</b>	<b>6.0</b>	<b>4.1</b>	<b>1.9</b>
Place	Expenditure	78.8	79.3	(0.4)	0.0	(0.3)	78.6	(0.2)	(0.4)	0.2
	Income	(34.3)	(32.4)	0.1	0.0	0.0	(32.3)	2.0	2.2	(0.2)
	<b>Subtotal</b>	<b>44.5</b>	<b>46.9</b>	<b>(0.3)</b>	<b>0.0</b>	<b>(0.3)</b>	<b>46.3</b>	<b>1.8</b>	<b>1.8</b>	<b>0.0</b>
Homes & Communities	Expenditure	46.6	72.2	(0.2)	0.0	(0.6)	71.3	24.7	22.4	2.3
	Income	(38.9)	(55.4)	0.0	0.0	0.0	(55.4)	(16.5)	(14.5)	(2.0)
	<b>Subtotal</b>	<b>7.7</b>	<b>16.8</b>	<b>(0.2)</b>	<b>0.0</b>	<b>(0.6)</b>	<b>15.9</b>	<b>8.2</b>	<b>7.9</b>	<b>0.3</b>
Corporate Services	Expenditure	22.0	26.5	0.0	0.0	(3.3)	23.2	1.2	1.2	(0.0)
	Income	(0.7)	(1.4)	0.0	0.0	0.0	(1.4)	(0.7)	(0.7)	0.0
	<b>Subtotal</b>	<b>21.3</b>	<b>25.1</b>	<b>0.0</b>	<b>0.0</b>	<b>(3.3)</b>	<b>21.8</b>	<b>0.5</b>	<b>0.5</b>	<b>(0.0)</b>
Chief Executive Office	Expenditure	8.0	8.5	0.0	0.0	(0.2)	8.3	0.3	0.1	0.2
	Income	(1.6)	(1.7)	0.0	0.0	0.0	(1.7)	(0.1)	0.0	(0.1)
	<b>Subtotal</b>	<b>6.4</b>	<b>6.8</b>	<b>0.0</b>	<b>0.0</b>	<b>(0.2)</b>	<b>6.6</b>	<b>0.2</b>	<b>0.1</b>	<b>0.1</b>
<b>Total Service Operating Budgets</b>		<b>272.2</b>	<b>307.3</b>	<b>(2.0)</b>	<b>0.0</b>	<b>(5.8)</b>	<b>299.3</b>	<b>27.1</b>	<b>28.0</b>	<b>(0.9)</b>

42. As can be seen from the table above, Service Operating Budgets are forecasting a £27.1m overspend which is the cumulative effect of a number of variances which are briefly outlined below by Cabinet Portfolio:
- i. **Finance** – As at Month 6 the service is reporting a pressure of £5.4m, which is a £1.7m adverse movement against the previous report. The variance is predominantly caused by a £2.2m pressure against the Council's Treasury budget as a result of the adverse financial position for the Council. The cash balance is forecast to reduce through the year as a consequence of the revenue overspend and the increase in the DSG deficit, leading to increased finance costs, however the forecast borrowing costs have reduced at Month 6 leading to a favourable movement in this area. This position is compounded by staffing pressures from agency staffing and the associated premium above the workforce budget. The adverse movement relates to the reduction in the use of flexible capital receipts to fund transformation costs.
  - ii. **Adult Social Care & Health** – are reporting an overspend of £5.0m, with adult care placements forecasting a pressure of £7.3m offset by a c£1.0m underspend against SEND Transport and further mitigations of £1.3m through reductions in staff forecasts and holding vacant posts. This position is driven by the ongoing and unrelenting growth in demand for the service since the pandemic, with all client groups reporting ongoing exceptional demand in 2025/26. To date, client numbers continue to grow above the budgeted position, particularly in Learning Disabilities and Mental Health services. The underspend in SEND Transport is driven by a more economical procurement of personal assistants and maximising efficiencies through the mix of delivery options. The movement against the prior month's forecast is primarily driven by the proposed budget virement from the general contingency budget.
  - iii. **Children & Young People's Services** – As at Month 6, services within this directorate are reporting a pressure of £6.0m, representing an adverse movement of £1.9m from Month 5. The pressure in this area is driven by additional demand for care, with this position being in part impacted by the Temporary Accommodation pressure leading to a lack of general needs properties within the Housing Revenue Account (HRA) for move-on. Additional pressure, and the reason for the forecast change since last month, is driven by a reduction in the use of flexible capital receipts to fund transformation costs within Education.
  - iv. **Place** – Are reporting an overspend of £1.8m at Month 6, representing no movement in forecast from Month 5. £2.2m of this variance relates to income, the largest driver for which is the forecast shortfall against the Garden Waste subscription fee (£0.8m), with further pressures across other income streams including the delivery of the Trade Waste income target rolled forward into 2025/26. Further shortfalls include pressures in Property Services against lease income. Part of this is linked to the Civic Centre Transformation saving and compounded by assumptions made about staffing costs incurred and the associated recharge into

the capital programme, and buyers premium. The underspend against expenditure is largely driven by staff vacancies being held to support the position where possible.

- v. **Homes & Communities** – Are reporting a net overspend of £8.2m, representing an adverse movement of £0.3m, driven by a gross expenditure pressure of £24.7m offset by additional income of £16.5m. The gross pressure is largely driven by temporary accommodation and homelessness support pressures. This reflects a national pressure, but with Hillingdon particularly impacted by Heathrow having a material impact on local supply and demand economics. The additional income is linked to the same driver whereby the additional demand for temporary accommodation attracts Housing Benefit Subsidy payments and grant funding where applicable. The change in forecast in this area is wholly driven by this pressure, with further risks reported in the summary of this report, particularly relating to those arriving from the Chagos Islands.
- vi. **Corporate Services** – As at Month 6 are reporting an overspend of £0.5m driven by a number of minor variances, with the most salient being an overspend within Human Resources of £0.4m due to staffing cost pressures, offset by a £0.2m underspend within Procurement.
- vii. **Chief Executive's Office** – Are reporting a pressure of £0.2m driven largely by staffing cost pressures within the Legal service.

### Collection Fund

43. At Month 6, the Council continues to report a minor deficit of £0.1m within the Collection Fund against 2025/26 activity, before the prior year deficit variance of £10.1m takes the total deficit to £10.2m. Within the Collection Fund, an adverse position is reported within Council Tax of £2.8m against in-year activity, offset by a favourable position within Business Rates of £2.7m. This position remains unchanged from Month 5 and is driven by the following key factors:
- i. Council Tax is presenting an in-year pressure of £2.8m against a £154.1m budget as a result of slow growth in the taxbase, with a further £9.2m being driven by the adverse movement on 2024/25.
  - ii. Business Rates is presenting an in-year surplus of £2.7m against a £72.1m budget, with this position being driven by pressures within collection, predominantly linked to empty properties, offset by a reduction in the Council's levy against retained business rates above the Government determined baseline level.
  - iii. The Business Rates position is then compounded by an adverse £0.8m against the 2024/25 outturn position.
  - iv. The Council continues to monitor the outstanding debt associated with Council Tax and Business Rates and provide cover against this debt, with this position remaining under review.



44. Any surpluses or deficits within the Collection Fund impact on the Council's future year budgets, with the position reported up to Month 9 impacting on the 2026/27 budget. This leads to an adverse impact of £10.2m set to be incorporated in the Council's refresh of the budget strategy for 2026/27, with any further updates thereafter between Month 10 and outturn impacting on 2027/28. This position therefore will increase the Council's 2026/27 budget gap by £10.2m.

### **General Fund Capital**

45. Table 4 presents the Month 6 forecast position for the 2025/26 General Fund Capital Programme, presented on a directorate basis. This represents the second formal monitoring position since the 2024/25 outturn and incorporates the latest approved budget movements, virements, and rephasing adjustments following the capital virements approved by Cabinet in Month 5.
46. The 2025/26 forecast expenditure stands at £95.0m against a revised budget of £138.4m, representing a net variance of £43.4m below budget. This comprises £38.6m of rephasing and a £4.8m cost variance (underspend). These variances are summarised in Table 4, including £0.1m newly announced grant funding from Thames Water Crane Valley for the Queenswalk River Restoration Project.
47. Across the five-year programme to 2029/30, total forecast expenditure is £361.3m, £4.8m below the approved budget of £366.1m. The principal driver of this movement remains the removal of DSG Capitalisation Support forecast (£4.0m) in relation to the Safety Valve contribution whilst the Council's contributions are suspended by the DfE. The remainder reflects genuine underspends on completed schemes rather than rephasing.
48. The programme continues to be characterised by timing and profiling movements across major education, regeneration, digital, and fleet schemes, with no material cost escalation reported. The overall variance remains consistent with prudent programme management and the phasing of delivery into future years, with the underspend reflecting Council activities to actively reduce spend and reduce borrowing requirement.
49. **Major Projects:** The in-year forecast of £63.8m is £26.7m below the revised budget of £90.5m, comprising £21.9m rephasing and a £4.8m cost variance.
50. The main drivers are rephasing within Meadow High School (£9.5m), Hillingdon Water Sports Facility (£7.0m), and Secondary School Expansions (£4.4m), reflecting construction sequencing, planning dependencies, and programme re-profiling.
51. Additional rephasing includes Harefield Family Hub (£2.0m), Otterfield Road Library (£1.1m), and Breakspear Crematorium (£0.6m), alongside smaller deferrals across depot, fleet, and green-space projects.
52. These are partly offset by £4.0m acceleration at the Civic Centre Transformation, where refurbishment activity has advanced ahead of schedule, with this investment linked to a revenue saving for the Council.
53. **Programme of Works:** The in-year forecast of £31.2m reflects £16.7m of rephasing, led by the School Building Condition Programme (£6.2m), Disabled Facilities Grant (£3.5m), and

Corporate Technology & Innovation (£3.4m), where project starts have been deferred to 2026/27 pending approval.

54. Fleet purchases (£2.0m) continue to experience delivery delays, particularly for electric vehicles, partially offset by the early arrival of heavy fleet and plant later this year.
55. Minor deferrals are also noted within the Chrysalis Programme (£0.4m). Overall, this represents delivery profiling rather than slippage due to performance or funding constraints.

**Table 4: General Fund Capital Programme Summary**

	Revised Budget 2025/26	Forecast 2025/26	Cost Variance 2025/26	Rephasing Variance 2025/26	5 Year Budget	5 Year Forecast	5 Year Variance
	£m	£m	£m	£m	£m	£m	£m
<b>Breakdown by Directorate</b>							
Finance	5.1	3.1	0.0	(2.0)	31.2	31.2	0.0
Adult Social Care and Health	2.4	2.4	0.0	0.0	13.8	13.8	0.0
Children's Services	4.0	0.0	(4.0)	0.0	4.0	0.0	(4.0)
Corporate Services	16.4	11.9	0.0	(4.5)	45.7	45.7	0.0
Place	110.5	77.6	(0.8)	(32.1)	271.3	270.6	(0.8)
<b>Grand Total</b>	<b>138.4</b>	<b>95.0</b>	<b>(4.8)</b>	<b>(38.6)</b>	<b>366.0</b>	<b>361.3</b>	<b>(4.8)</b>
<b>Breakdown by Category</b>							
GF Major Projects	90.4	63.8	(4.8)	(21.9)	186.8	182.1	(4.8)
GF Programme of works	48.0	31.2	0.0	(16.7)	173.2	173.2	0.0
Capital GF Contingency	0.0	0.0	0.0	0.0	6.0	6.0	0.0
<b>Grand Total</b>	<b>138.4</b>	<b>95.0</b>	<b>(4.8)</b>	<b>(38.6)</b>	<b>366.0</b>	<b>361.3</b>	<b>(4.8)</b>

56. The below section sets out the salient variance by directorate, with a full programme breakdown included in Appendix A1:
  - i. **Finance** – Forecast £3.1m against a £5.1m budget, reflecting £2.0m of rephasing within vehicle purchases due to ongoing electric fleet supply constraints. A minor acceleration in heavy fleet procurement is expected later in the year.
  - ii. **Adult Social Care and Health** – Forecast £2.4m, in line with the £2.4m budget, with steady progress across Investment in Home Care Capacity and Equipment Capitalisation. No rephasing or cost variances are reported.
  - iii. **Children's Services** – Forecast nil spend against a £4.0m budget, resulting in a £4.0m cost variance, reflecting the removal of DSG Capitalisation Support at Month 6 with the DfE having suspended the Council's Safety Valve contributions where negotiations are ongoing.
  - iv. **Corporate Services** – Forecast £11.9m against a budget of £16.4m, representing £4.5m of rephasing. The variance is primarily within Corporate Technology & Innovation, where several Digital projects (e.g. Cloud Telephony, GIS Security/API, and AI Assistant) have been deferred pending contract release. No material cost pressures are reported.

- v. **Place** – Forecast £77.6m against a budget of £110.4m, representing a total variance of £32.9m, comprising £32.1m rephasing and a £0.8m underspend. The rephasing reflects movements across education, housing, and leisure schemes, including Meadow High (£9.5m), Water Sports Facility (£7.0m), Secondary Expansions (£4.4m), and Harefield Family Hub (£2.0m). The underspend reflects completed or scaled-back projects such as the Battle of Britain Bunker (£0.3m) and Flood Alleviation (£0.3m)

- 57. A number of schemes remain paused or under management review across Directorates, including Flood Alleviation, Older People's Initiatives, and Appropriation of Townfield. Other schemes, such as Battle of Britain Bunker Water Mitigation and ERI Pinn Meadow, have now completed with underspends to be released.
- 58. Acceleration continues within the Civic Centre Transformation, consistent with revised delivery sequencing and design progress, contributing to reduced rephasing in-year within Corporate Services, with this investment generating a revenue saving for the Council.
- 59. Rephasing remains the predominant factor across the General Fund capital programme, primarily reflecting planning dependencies, procurement lead times, and supply constraints within major education, regeneration, fleet, and ICT projects. These reflect timing rather than cost pressures, and while delivery profiles continue to be actively managed, no systemic delivery or financial risks have been identified at this stage. The wider capital programme, including schemes slipping from 2025/26, will be reviewed as part of the 2026/27 capital budget setting process to assess those projects which are no longer suitable to progress in the Council's current financial position.

### Capital Financing – General Fund

- 60. The funding for the above expenditure is set out in the table below.

**Table 5: General Fund Capital Financing**

	Approved Financing 2025/26	Forecast 2025/26	Cost Variance 2025/26	Rephasing Variance 2025/26	Total Financing Budget 2025- 2030	Total Financing Forecast 2025-2030	Total Variance
	£m	£m	£m	£m	£m	£m	£m
Grants & Other Contributions	39.9	18.1	0.0	(21.8)	95.8	94.1	(1.7)
S106	0.4	0.6	0.0	0.2	0.4	0.6	0.2
Capital Receipts	17.0	5.7	(4.0)	(7.3)	46.5	41.5	(5.0)
CIL	3.0	3.0	0.0	0.0	21.0	17.2	(3.8)
Prudential Borrowing	78.1	67.6	(0.8)	(9.7)	202.3	207.9	5.5
<b>Total Funding</b>	<b>138.4</b>	<b>95.0</b>	<b>(4.8)</b>	<b>(38.6)</b>	<b>366.0</b>	<b>361.3</b>	<b>(4.8)</b>

- 61. Table 5 summarises the Month 6 General Fund financing position. The in-year forecast of £95.0m is £43.4m below the revised budget of £138.4m, comprising £38.6m of rephasing and a £4.8m underspend. The lower in-year spend profile reduces immediate borrowing and grant drawdown requirements.

62. The £38.6m of rephasing is primarily funded from Government grants (£21.8m) and prudential borrowing (£9.7m), with minor movements across capital receipts driven by the revised transformation capitalisation spend in revenue. Grant-funded rephasing reflects projects that have not yet reached delivery or approval milestones (e.g. School Buildings Condition Programme £6.2m, Disabled Facilities Grant £3.5m, and Hillingdon Water Sports Facility £7.0m). Associated grants will be carried forward in accordance with funding conditions. Borrowing reductions mainly relate to deferred fleet and ICT procurement, driven by supply-chain lead times. This reduction in capital spend will reduce the pressure on the Council's cash position by year end.
63. Overall, the five-year financing forecast of £361.3m remains broadly aligned with the approved programme value, with the £4.8m variance corresponding to known cost adjustments. Capital receipts remain a key funding stream, and continued close monitoring of receipt attainment will be essential to ensure alignment between financing and delivery, informing any required reprioritisation within the programme.

### **Schools Budget**

64. As of Month 6 (September 2025), the Dedicated Schools Grant (DSG) is forecasting a deficit of £12.5m with no change from Month 5, representing an improvement from the £15m outturn for 2024/25. This in-year shortfall is entirely driven by continued demand and cost pressures in High Needs placements, which remain significantly underfunded in the DSG allocation from the Department for Education (DfE). These pressures are not unique to the local authority; nationally, local authorities are facing similar challenges. Rising demand for specialist provision, a shortage of maintained special school places, and increasing reliance on costly independent non-maintained placements are contributing to widespread overspends in the High Needs Block. Despite efficiency targets and mitigation efforts, the structural underfunding of High Needs provision continues to place significant strain on DSG budgets across the country. The table below provides a summary of the Schools Budget and the current forecast.
65. Whilst the Safety Valve funding with the Department of Education (DfE) is currently suspended the Council is actively progressing a range of strategic initiatives aimed at improving outcomes for children and young people with Special Educational Needs and Disabilities (SEND), while ensuring more sustainable use of resources. These efforts include reducing the overall number of Education, Health and Care Plans (EHCPs), lowering the average top-up funding required per EHCP, and decreasing the average cost of education placements. In parallel, the Council is working to enhance the value for money of commissioned services and to increase financial contributions from partner agencies towards the support of children and young people with SEND. The Council is beginning to see a significant reduction in the in-year deficit as a consequence.

**Table 6: DSG Income and Expenditure Summary**

Dedicated Schools Grant (DSG) Blocks	Budget 2025/26			Forecast  £m	Variance  £m	Month 4  £m	Change  £m
	DSG Settlement	Academy Recoupment	LBH Maintained				
	£m	£m	£m				
Schools Block	297.9	(187.0)	110.9	110.9	0	0	0
Early Years Block	48.3	0	48.3	48.3	0	0	0
Central Schools Block	2.5	0	2.5	2.5	0	0	0
High Needs Block	86.8	(13.1)	73.7	73.7	0	0	0
Budgeted Use of Reserves	(12.5)	0	(12.5)	(12.5)	0	0	0
<b>Total</b>	<b>423.0</b>	<b>-200.1</b>	<b>222.9</b>	<b>222.9</b>	<b>0</b>	<b>0</b>	<b>0</b>
Balance Brought Forward 1 April 2025					<b>65.9</b>		
Budgeted Use of Reserves					<b>12.5</b>		
Pressure					<b>0</b>		
<b>Total Deficit at 31 March 2026</b>					<b>78.4</b>		

66. A core target for the revised High Needs Safety Valve Plan is to actively reduce unit costs by concentrating SEN support in-borough within our maintained schools and thereby reduce dependence on high cost independent and out-of-borough placements. Trend data shows clear evidence that the approach which has been in place since early 2024/25 is now beginning to have a positive impact.
67. The mounting DSG deficits remain a significant national issue, with projections indicating a substantial funding gap for English councils. Specifically, English councils face a £2.3 billion funding gap in 2025/26, rising to £3.9 billion by 2026/27, creating a £6.2 billion shortfall over two years, according to the Local Government Association (LGA). This deficit is primarily driven by increased demand for services for children with special educational needs and disabilities (SEND).



## Housing Revenue Account

68. The Housing Revenue Account (HRA) is currently forecasting a breakeven position, with ongoing market and demand risk being closely monitored throughout the year. The 2025/26 closing HRA General Balance is forecast to be £15.0m, in line with the target level set out in the Council's budget strategy. The table below presents key variances with a £0.5m pressure against operating costs being compounded by a £0.4m variance against rental income. This position is kept to breakeven by a reduction in the capital financing costs, with the Council opting to reduce the revenue contribution to capital schemes in order to maintain the target level of balances, whilst ensuring the HRA remains in a financially sustainable position. This position therefore represents a £0.4m adverse movement since Month 5 offset by a £0.4m reduction in revenue contributions to capital.

**Table 7: Housing Revenue Account**

Service	Budget £m	Forecast Outturn £m	Variance £m	Prior Month £m	Change £m
Rent & Other Income	(85.7)	(85.3)	0.4	0.4	0.0
<b>Net Income</b>	<b>(85.7)</b>	<b>(85.3)</b>	<b>0.4</b>	<b>0.4</b>	<b>0.0</b>
Operational Assets	16.0	16.0	0.0	0.0	0.0
Director of Housing	10.3	10.8	0.5	0.5	0.0
Other Service Areas	1.0	1.4	0.4	0.0	0.4
Contribution to Shared Services	17.4	17.4	0.0	0.0	0.0
<b>HRA Operating Costs</b>	<b>44.7</b>	<b>45.6</b>	<b>0.9</b>	<b>0.5</b>	<b>0.4</b>
Capital Programme Financing	<b>18.9</b>	<b>21.5</b>	<b>2.6</b>	<b>3.0</b>	<b>(0.4)</b>
Interest and Investment Income	22.1	18.2	(3.9)	(3.9)	0.0
<b>Total Capital Programme Financing</b>	<b>41.0</b>	<b>39.7</b>	<b>(1.3)</b>	<b>(0.9)</b>	<b>(0.4)</b>
<b>(Surplus) / Deficit</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		
General Balance 01/04/2025	15.0	15.0	0.0		
<b>General Balance 31/03/2026</b>	<b>15.0</b>	<b>15.0</b>	<b>0.0</b>		

69. At Month 6, rent and other income is forecasting a pressure of £0.4m. The Council's budget strategy to deliver a net increase of 209 new homes is anticipated to be on track to deliver but weighted towards the latter part of the year. The budgets are based on a void rate of 1.02%, with any material variation from this level feeding into rental projections as appropriate.
70. The HRA Operating Costs budget is £44.7m at Month 6 is forecasting a minor £0.9m overspend against the budget, due to staffing pressures, B&B costs associated with emergency housing and leaseholder insurance premiums. The £0.4m adverse movement is driven by costs associated with the implementation costs of a system upgrade. These budgets are based on supporting the Council's housing stock as at 1 April 2025, with growth added in line with the increase in stock numbers and to support the additional costs associated with this increase and ensuring regulatory compliance. This area remains under

review, with growth in these budgets included in the approved budget from February 2025 being deployed as and when new homes are brought online.

71. Operational Assets are forecast to breakeven. This incorporates a number of minor pressures, the most material of which is a reduction in the cost of subsidence surveys, offset by in-year mitigations, predominantly linked to a reduction in boiler repairs driven by the replacement programme. Inflation was added to HRA Operating Costs in the Council's budget strategy, with forecasts indicating the uplift is sufficient to meet inflationary demands on the service.
72. The detail behind the service delivery of the blocks included in table 7 are as follows:
  - i. Operational Assets budget funds the services provided for repairs and maintenance, void repairs, compliance and inspections.
  - ii. The Director of Housing budget includes tenancy management and tenants' services. The budgets include utility costs, and these will continue to be monitored given the volatility of the electricity and gas markets in recent times.
  - iii. The Other Service Areas budget includes the Careline contract, HRA specific ICT costs and the revenue regeneration costs.
  - iv. The Contribution to Shared Services budget includes the development and risk contingency, overheads and corporate and democratic core charges, and the bad debt provision.
73. The Medium Term Financial Strategy (MTFS) savings target is £1.0m which is expected to be delivered by virtue of the Council's general fund savings against support services, leading to a reduction in the recharge to the HRA for these services.
74. As at Month 6 the capital programme financing budget of £41.0m was forecast to underspend by £1.3m. This budget forecast includes £21.5m (depreciation and revenue contributions) to fund the HRA capital programme, the position also includes £18.2m for repayments of loans and interest on borrowing. This position will be closely monitored throughout the year with clear linkages to the commissioning plan.

### **HRA Capital Programme**

75. At Month 6, the HRA Capital Programme is forecasting an underspend of £16.1m, with the whole of this variance proposed for rephasing into future years.

**Table 8: HRA Capital Programme**

	Revised Budget 2025/26	Forecast 2025/26	Cost Variance 2025/26	Rephasing Variance 2025/26	5 Year Budget	5 Year Forecast	5 Year Variance
	£m	£m	£m	£m	£m	£m	£m
HRA Major Projects	142.2	134.4	0.0	(7.8)	239.5	239.5	0.0
HRA Regeneration	19.6	19.6	0.0	0.0	104.1	104.1	0.0
HRA Programme of Works	57.3	49.0	0.0	(8.3)	205.6	205.6	0.0
<b>Grand Total</b>	<b>219.1</b>	<b>203.0</b>	<b>0.0</b>	<b>(16.1)</b>	<b>549.2</b>	<b>549.2</b>	<b>0.0</b>

76. **HRA Major Projects** – The in-year forecast of £134.4 million represents £7.8 million rephasing against the £142.2 million revised budget. The variance arises mainly within Development Allocated, where £7.8 million has been reprofiled into 2026/27 to reflect the timing of start onsite and contract mobilisation at Falling Lane. Acquisition programmes, including properties purchased and repaired under the Madison Brooke contract, are forecast to spend to budget, maintaining delivery momentum and supporting stock acquisition objectives across the year. All major schemes remain within approved five-year allocations, and no cost pressures are reported.
77. **HRA Regeneration** – Forecast expenditure of £19.6 million remains fully aligned to the approved delivery profile for Hayes Regeneration, with no rephasing or cost movement reported. Progress continues across enabling and early-works phases, with the five-year allocation of £104.1 million unchanged.
78. **HRA Programme of Works** – Forecast expenditure of £49.0 million is £8.3 million below budget, wholly attributable to rephasing: Green Homes Initiatives – £5.0 million rephased following delays in supplier mobilisation and extended delivery times for insulation and heat-pump works. HRA Works to Stock – £1.0 million rephased as contractor scheduling is adjusted for structural and compliance projects. House Extensions – £2.3 million rephased due to ongoing access and planning constraints. All other workstreams, including Major Adaptations and Kitchens and Bathrooms, continue broadly to plan with spend forecast to meet annual targets.
79. Overall, the £16.1 million rephasing across the programme is timing-related only, reflecting delivery sequencing and resource planning. No cost pressures, funding gaps, or scope reductions have been identified at Month 6. Full programme level details are set out in Appendix A2.

### **HRA Capital Financing**

80. The capital financing that supports this position is set out in the table below.

**Table 9: HRA Capital Financing**

	Approved Financing 2025/26	Forecast 2025/26	Cost Variance	Phasing Variance	Total Financing Budget 2025/26- 2029/30	Total Financing Forecast 2025/26- 2029/30	Total Variance 2 025/26- 2029/30
	£m	£m	£m	£m	£m	£m	£m
Grants & Other Contributions	79.9	74.5	0.0	(5.4)	194.0	188.6	(5.4)
Capital Receipts	0.0	0.0	0.0	0.0	20.6	20.6	0.0
Revenue Contribution	39.8	38.1	0.0	(1.8)	109.4	116.3	6.9
Prudential Borrowing	99.4	90.4	0.0	(8.9)	225.2	223.7	(1.5)
<b>Total Funding</b>	<b>219.1</b>	<b>203.0</b>	<b>0.0</b>	<b>(16.1)</b>	<b>549.2</b>	<b>549.2</b>	<b>0.0</b>

81. The Month 6 capital monitoring position reports £16.1m rephasing within the HRA capital programme. This is primarily driven by Development (£7.8m), Green Homes Initiatives (£5.0m), House Extensions (£2.3m), and Works to Stock (£1.0m).
82. The rephasing is reflected across grant funding (£5.4m), revenue contributions (£1.8m), and prudential borrowing (£8.9m). This results in lower in-year grant drawdown and borrowing, as works and milestones shift into 2026/27.
83. The slippage reflects delivery timing rather than funding loss, and overall financing remains within the approved HRA programme envelope.

**Table 10: Outstanding Deposits**

Period	Actual (£m)	Actual (%)	Movement from M5 (£m)
Call Accounts and Month Market Funds	35.8	64.1%	14.3
Up to 3 Month Fixed-Term Deposits	5.0	9.0%	(5.3)
<b>Total</b>	<b>40.8</b>	<b>73.1%</b>	<b>9.0</b>
Strategic Pooled Funds	15.0	26.9%	0
<b>Deposits at 30 September 2025</b>	<b>55.8</b>	<b>100.0%</b>	<b>9.0</b>
Average Investment Balances M6	<b>54.9</b>		<b>(4.6)</b>

84. Deposits are held with UK institutions, all of which hold a minimum A- Fitch (or lowest equivalent) long-term credit rating and AAA rated Money Market Funds (MMFs). UK deposits are currently held in NatWest Bank plc and the DMADF. There is also an allocation of £15m to three externally managed strategic pooled funds.
85. The average rate of return on day-to-day operational treasury balances since the beginning of the new financial year is 4.23%. As part of the Council's investment strategy for 2024/25, the Council continues to hold a total of £15m in three long-dated strategic pooled funds (£5m in each). The strategic pooled funds have a long-term investment horizon with dividends being distributed periodically. When including projected dividend income on these strategic pooled funds, the overall rate of return increases to 4.27% based on the previous six months income average.
86. Bank of England base rate fell to 4% in August which will result in lower future returns on day-to-day operational investments in money market funds and the DMADF.
87. The Council aims to minimise its exposure to bail-in risk by utilising bail-in exempt instruments and institutions whenever possible. However, due to the significant amount held in instant access facilities, which is needed to manage daily cashflow, it is not possible to fully protect Council funds from bail-in risk. Over September on average 82% of the Council's day-to-day operational treasury investments had exposure to bail-in risk compared to a September benchmark average of 75% for London and metropolitan boroughs, as investments were partly held in money market funds which were returning a higher yield than DMADF. However, money market funds reduce the risk of bail-in compared to bank deposits as they provide wide diversification of investment risks with professional fund manager services.
88. Liquidity was maintained by placing surplus funds in instant access accounts and making short-term deposits, including overnight deposits, in the DMADF. Cash flow was managed by ensuring maturities of any short-term deposits with the DMADF were matched to outflows. Average investments over the month (including strategic pooled funds) were £54.9m, a decrease of £4.6m from Month 5 and balances at the end of September were £9m higher than at the end of August.



**Table 11: Outstanding Debt**

	<b>General Fund</b>	<b>HRA</b>	<b>Total</b>	<b>Average Interest Rate (Total)</b>
	<b>£m</b>	<b>£m</b>	<b>£m</b>	<b>%</b>
PWLB Long Term	167.9	304.4	472.3	3.96%
Market	10.0	28.0	38.0	4.11%
Temporary Borrowing:				
Local Authorities	78.0	0.0	78.0	4.56%
PWLB	0.0	0.0	0.0	0.0%
	<b>255.9</b>	<b>332.4</b>	<b>588.3</b>	<b>4.05%</b>
Movement from Prior Month	18.7	(2.2)	16.5	(0.02%)

89. During September 2025, a £15m GF LA loan was repaid. A £42m loan was acquired from PWLB to replace the LA loan and fulfil cashflow requirements.
90. PWLB rates fluctuated throughout September, ending in a higher position to the beginning of the month – an overall increase of 6bps from the end of August.

### **Treasury Management and Non- Treasury Prudential Indicators as at 30<sup>th</sup> September 2025**

#### **Treasury Management Indicators**

91. As required by the 2021 CIPFA Treasury Management Code, the Council monitors and measures the following treasury management prudential indicators.
92. **Liability Benchmark:** This indicator compares the Council's actual existing borrowing against a liability benchmark that has been calculated to show the lowest risk level of borrowing. The liability benchmark is an important tool to help establish whether the Council is likely to be a long-term borrower or long-term investor in the future and so shape its strategic focus and decision making. It represents an estimate of the cumulative amount of external borrowing the Council must hold to fund its current capital and revenue plans while keeping treasury investments at the minimum level of investments of £25m (comprising £10m required to manage day-to-day cash flow plus £15m held in Strategic Pooled Funds).

	Actual 2024/25 £m	Budget 2025/26 £m	Forecast 2025/26 £m
General Fund CFR	307.4	408.7	385.7
HRA CFR	279.6	322.2	346.1
<b>Total CFR</b>	<b>586.9</b>	<b>730.9</b>	<b>731.7</b>
Existing Borrowing including lease liabilities	-523.0	-642.9	-722.0
<b>Gross External Borrowing Required to meet CFR</b>	<b>63.9</b>	<b>88.0</b>	<b>9.7</b>
Projected Useable Reserves**	-95.0	-60.1	-95.0
Accumulated DSG Deficit	65.9	63.3	78.4
Projected Working Capital**	-30.6	-40.0	-30.0
<b>(Investments) / New Borrowing Required</b>	<b>4.3</b>	<b>51.2</b>	<b>-36.9</b>
Plus Minimum Investments	25.0	25.0	25.0
Liability Benchmark	<b>29.3</b>	<b>76.2</b>	<b>-11.9</b>

\*\*it is assumed projected usable reserves and working capital for 2025/26 will remain at similar levels to 2024/25. This may vary depending on outturn.

93. **Maturity Structure of Borrowing:** This indicator is set to control the Council's exposure to refinancing risk. The upper and lower limits on the maturity structure of all borrowing are set out in table below:

	Upper Limit %	Lower Limit %	30/09/25 Actual %	Complied Yes/No
Under 12 months	0	50	18.49	Yes
12 months and within 24 months	0	50	15.17	Yes
24 months and within 5 years	0	50	23.55	Yes
5 years and within 10 years	0	100	21.93	Yes
10 years and within 20 years	0	100	9.53	Yes
20 years and within 30 years	0	100	0.85	Yes
30 years and within 40 years	0	100	5.88	Yes
40 years and within 50 years	0	100	3.91	Yes
50 years and above	0	100	0.68	Yes

\*Time periods start on the first day of each financial year. LOBO loans are shown at first call option.

94. **Long-term Treasury Management Investments:** The purpose of this indicator is to control the Council's exposure to the risk of incurring losses by seeking early repayment of its investments. The prudential limits on the long-term treasury management limits are:

Price Risk Indicator	2024/25 £m	2025/26 £m	2026/27 £m	2027/28 £m	2028/29 £m
Limit on principal invested beyond year end	35.0	35.0	35.0	35.0	35.0
Principal invested beyond year end	15.0	15.0	15.0	15.0	15.0
Complied	Yes	Yes	Yes	Yes	Yes

\*Figures include Strategic Pooled Funds with no fixed maturity date.

95. **Security:** The Council has adopted a voluntary measure of its exposure to credit risk by monitoring the value-weighted average credit rating of its investment portfolio.

	2025/26 Target	30/09/25 Actual	Complied Yes/No
Portfolio average credit rating	A-	AA-	Yes

96. **Liquidity:** The Council has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments within one working day, without additional borrowing.

Liquidity Risk Indicator	2025/26 Target £m	Year To September Average Actual £m	Complied Yes/No
Total cash available within one working day	10.0	32.4	Yes

97. **Interest Rate Exposures:** This indicator is set to control the Council's exposure to interest rate risk. Bank Rate fell by 0.5% from 4.50% on 1st April to 4.00% by 30th September.

Interest rate risk indicator	2025/26 Target £m	30/09/25 Actual £m
Upper limit on one-year revenue impact of a 0.5% <u>rise</u> in interest rates	1.00	0.16
Upper limit on one-year revenue impact of a 0.5% <u>fall</u> in interest rates	(1.00)	(0.16)

98. The impact of a change in interest rates is calculated both on the assumption that fixed-rate maturing loans and investments will be replaced at their existing fixed rates and with a forecast maximum variable rate net investment and debt position of £100m.

### Non-Treasury Indicators

99. The Council measures and manages its capital expenditure, borrowing and commercial and service investments with references to the following indicators. Budget estimates reported in the following tables are from the Treasury Management Strategy (TMS) report approved by Cabinet in February 2025.
100. **Capital Financing Requirement:** The Council's cumulative outstanding amount of debt finance is measured by the capital financing requirement (CFR). This increases with new debt-financed capital expenditure and reduces with MRP / loans fund repayments and capital receipts used to replace debt. The actual CFR is calculated on an annual basis.

	2024/25 Actual £m	2025/26 TMS Estimate	2025/26 Forecast £m
General Fund services	307.3	408.7	385.6
Council housing (HRA)	279.6	322.2	346.1
<b>TOTAL</b>	<b>586.9</b>	<b>730.9</b>	<b>731.7</b>

101. **Gross Debt and the Capital Financing Requirement:** Statutory guidance is that debt should remain below the capital financing requirement, except in the short term. Council debt is now almost at the limit of its stated Capital Financing requirement. This, aligned with the revenue overspend position, adversely impacting the councils cash position.

	2024/25 Actual £m	2025/26 TMSS Estimate £m	2025/26 Forecast £m
Debt (incl. PFI & leases)	523.0	642.9	722.0
Capital Financing Requirement	586.9	730.9	731.7

102. Forecast external debt is higher than anticipated at the time of the February Treasury Management Strategy report reflected in the in-year cost pressure reported within treasury in the budget monitoring report.
103. **Debt and the Authorised Limit and Operational Boundary:** The Council is legally obliged to set an affordable borrowing limit (also termed the Authorised Limit for external debt) each year. In line with statutory guidance, a lower “operational boundary” is also set as a warning level should debt approach the limit.

	Debt at 30/09/25 £m	2025/26 Operational Boundary £m	2025/26 Authorised Limit £m	Complied? Yes/No £m
Borrowing	588.3	958.6	988.6	Yes
PFI/Leases	5.5	25.0	50.0	
<b>Total debt</b>	<b>593.8</b>	<b>983.6</b>	<b>1,038.6</b>	

104. Since the operational boundary is a management tool for in-year monitoring it is not significant if the boundary is breached on occasions due to variations in cash flow, and this is not counted as a compliance failure. However, the total debt has remained below the operational boundary.
105. **Net Income from Commercial and Service Investments to Net Revenue Stream:** The Council’s income from commercial and service investments as a proportion of its net

revenue stream has been and is expected to be as indicated below.

	2024/25 Actual £m	2025/26 Forecast £m
Total net income from service and commercial investments	0.3	0.3
Proportion of net revenue stream	0.1%	0.1%

106. **Proportion of Financing Costs to Net Revenue Stream:** Although capital expenditure is not charged directly to the revenue budget, interest payable on loans and (MRP / loans fund repayments) are charged to revenue. Note investment income has been removed from the definition of financing costs.

107. The net annual charge is known as financing costs; this is compared to the net revenue stream i.e. the amount funded from Council Tax, business rates and general government grants.

	2024/25 Actual £m	2025/26 Budget £m	2025/26 Forecast £m
Financing costs (interest payable and MRP)	16.8	18.9	19.8
Proportion of net revenue stream	6%	6%	7%



## Appendix A1: General Fund Capital

	Revised Budget 2025/26 £m	Forecast 2025/26 £m	Cost Variance 2025/26 £m	Rephasing Variance 2025/26 £m	5 Year Budget £m	5 Year Forecast £m	5 Year Variance £m	Total Council Resource s £m	5 Year Grants and Contribution £m	5-Year Forecast Spend £m
<b>GF Major Projects</b>										
<b>Children's Services</b>										
DSG Capitalisation Support		4.0	0	(4.0)	0	4.0	0	(4.0)	0	0
<b>Children's Services Total</b>		<b>4.0</b>	<b>0</b>	<b>(4.0)</b>	<b>0</b>	<b>4.0</b>	<b>0</b>	<b>(4.0)</b>	<b>0</b>	<b>0</b>
<b>Corporate Services</b>										
Capitalisation of Transformation Expenditure		10.0	10.0	0	0	31.0	31.0	0	0	31.0
<b>Corporate Services Total</b>		<b>10.0</b>	<b>10.0</b>	<b>0</b>	<b>0</b>	<b>31.0</b>	<b>31.0</b>	<b>0</b>	<b>0</b>	<b>31.0</b>
<b>Resident's Services</b>										
SRP / SEND		23.5	14.0	0	(9.5)	23.5	23.5	0	20.2	3.3
Jubilee Leisure Centre, West Drayton		10.2	10.2	0	0	10.8	10.8	0	9.8	0.0
Investment in Home Care Capacity		9.9	9.9	0	0	29.9	29.9	0	27.4	0
Hillingdon Water Sports Facility		8.0	1.0	0	(7.0)	18.0	18.0	0	0	18.0
Secondary School Expansions		6.0	1.6	0	(4.4)	6.0	6.0	0	1.3	4.7
Ovic Centre Transformation		2.5	6.5	0	4.0	7.3	7.3	(0.0)	7.3	0
Northwood Hills Library (New)		2.4	2.4	0	0	2.4	2.4	0	2.4	0
Harefield Family Hub New Build		2.2	0.2	0	(2.0)	3.6	3.6	0	3.6	0
Carbon Initiatives		1.9	1.9	0	0	7.9	7.9	0	6.0	1.9
Green Spaces Machinery		1.5	1.2	0	(0.3)	4.5	4.5	0	4.5	0
Otterfield Road library		1.4	0.3	0	(1.1)	1.9	1.9	0	1.9	0
Charville Lane - Children Specialist House		1.3	1.2	0	(0.1)	1.4	1.4	0	1.4	0.1
Refurbishment of Crematorium		0.9	0.3	0	(0.6)	9.0	9.0	0	6.0	3.0
New Years Green Lane Extension		0.9	0.2	0	(0.7)	0.9	0.9	0	0.8	0.1
Staying Close Project - Children's Respite		0.7	0.7	0	0	0.7	0.7	0	0.7	0
Cranford Park Heritage		0.5	0.5	0	0	0.6	0.6	0	0.5	0.1
Waste Services Improvements		0.5	0.5	0	0	0.6	0.6	0	0.6	0
Shopping Parade Initiatives		0.4	0.4	0	0	0.4	0.4	0	0.4	0
Battle of Britain Underground Bunker		0.4	0.0	(0.3)	0	0.4	0.0	(0.3)	0.4	0
Flood Alleviation		0.3	0	(0.3)	0	0.7	0.4	(0.3)	0.1	0.5
Harlington Road Depot Fuel Pumps & Canopy		0.3	0	0	(0.3)	0.6	0.6	0	0.6	0
Botwell Leisure Centre Adaptations		0.3	0.3	0	0	0.3	0.3	0	0.3	0
Uxbridge Cemetery Gatehouse & Chapel Refurbishment		0.2	0.2	0	0	0.2	0.2	0	0.2	0
Parking Improvements		0.2	0.2	0	0	0.2	0.2	0	0.2	0
Appropriation of Townfield to General Fund		0.1	0	(0.1)	0	0.1	0	(0.1)	0.1	0
Yewlsley / West Drayton Community Centre		0.0	0.0	0	0	0.0	0.0	0	0.0	0
Asha Day Centre Refurbishment		0.0	0.0	0	0	0.0	0.0	0	0.0	0
Housing Developments		0	0	0	0	20.0	20.0	0	20.0	0
Motor Vehicle Workshop - Relocation		(0.0)	(0.0)	0	0	(0.0)	(0.0)	0	(0.0)	(0.0)
<b>Resident's Services Total</b>		<b>76.5</b>	<b>53.8</b>	<b>(0.8)</b>	<b>(21.9)</b>	<b>151.8</b>	<b>151.1</b>	<b>(0.8)</b>	<b>116.7</b>	<b>31.7</b>
<b>GF Major Projects Total</b>		<b>90.5</b>	<b>63.8</b>	<b>(4.8)</b>	<b>(21.9)</b>	<b>186.8</b>	<b>182.1</b>	<b>(4.8)</b>	<b>116.7</b>	<b>31.7</b>
<b>GF Programme of works</b>										
<b>Finance</b>										
Purchase of Vehicles		4.7	2.7	0	(2.0)	23.3	23.3	0	23.3	0
Devolved Capital to Schools		0.4	0.4	0	0	1.9	1.9	0	0	1.9
<b>Finance Total</b>		<b>5.1</b>	<b>3.1</b>	<b>0</b>	<b>(2.0)</b>	<b>25.2</b>	<b>25.2</b>	<b>0</b>	<b>23.3</b>	<b>1.9</b>
<b>Corporate Services</b>										
Corporate Technology and Innovation Programme		6.4	1.9	0	(4.5)	14.7	14.7	0	11.5	0
<b>Corporate Services Total</b>		<b>6.4</b>	<b>1.9</b>	<b>0</b>	<b>(4.5)</b>	<b>14.7</b>	<b>14.7</b>	<b>0</b>	<b>11.5</b>	<b>0</b>
<b>Adult Social Care and Health</b>										
Equipment Capitalisation - Social Care		2.4	2.4	0	0	13.8	13.8	0	0	13.8
<b>Adult Social Care and Health Total</b>		<b>2.4</b>	<b>2.4</b>	<b>0</b>	<b>0</b>	<b>13.8</b>	<b>13.8</b>	<b>0</b>	<b>0</b>	<b>13.8</b>
<b>Resident's Services</b>										
Highways Structural Works		12.7	12.7	0	0	52.7	52.7	0	42.3	5.7
School Building Condition Works		7.8	1.5	0	(6.3)	20.2	20.2	(0.0)	0	20.2
D.F.G. - Mandatory		5.6	2.1	0	(3.5)	14.2	14.2	0.0	0	14.2
Orchylis Programme		2.1	1.7	0	(0.4)	6.1	6.1	0	6.1	0
Transport for London		1.2	1.2	0	0	7.0	7.0	0	0	7.0
Street Lighting Replacement		1.0	1.0	0	0	5.2	5.2	0	5.2	0
Infrastructure Investments		0.7	0.7	0	0	0.7	0.7	0	0.7	0
Environmental and Recreational Initiatives - Green Spaces		0.5	0.5	0	0	0.5	0.5	0	0.4	0.1
Youth Provision		0.5	0.5	0	0	0.5	0.5	0	(0.6)	1.2
Property Works Programme		0.5	0.5	0	0	6.1	6.1	0	6.1	0.0
Highways Bridges and Structures		0.4	0.4	0	0	2.0	2.0	0	2.0	0
Playground Replacement Programme		0.3	0.3	0	0	1.1	1.1	0	1.1	0
Leisure Centre Refurbishment		0.3	0.3	0	0	0.7	0.7	0	0.7	0
Older Peoples Initiative		0.2	0	(0.2)	0	1.0	0.8	(0.2)	1.0	0
CCTV Programme		0.2	0.2	0	0	0.9	0.9	0	0.9	0
Road Safety		0.1	0.1	0	0	0.6	0.6	0	0.6	0
Highways Section 106 Projects		0	0.2	0.2	0	0	0.2	0.2	0	0
<b>Resident's Services Total</b>		<b>34.0</b>	<b>23.8</b>	<b>(0.0)</b>	<b>(10.2)</b>	<b>119.5</b>	<b>119.5</b>	<b>(0.0)</b>	<b>66.4</b>	<b>48.3</b>
<b>GF Programme of works Total</b>		<b>48.0</b>	<b>31.2</b>	<b>(0.0)</b>	<b>(16.7)</b>	<b>173.2</b>	<b>173.2</b>	<b>(0.0)</b>	<b>101.1</b>	<b>64.1</b>
<b>Capital GF Contingency</b>										
<b>Finance</b>										
General Fund Capital Contingency		0	0	0	0	6.0	6.0	0	6.0	0
<b>Finance Total</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>6.0</b>	<b>6.0</b>	<b>0</b>	<b>6.0</b>	<b>0</b>
<b>Capital GF Contingency Total</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>6.0</b>	<b>6.0</b>	<b>0</b>	<b>6.0</b>	<b>0</b>
<b>Grand Total</b>		<b>138.4</b>	<b>95.0</b>	<b>(4.8)</b>	<b>(38.6)</b>	<b>366.1</b>	<b>361.3</b>	<b>(4.8)</b>	<b>223.8</b>	<b>95.8</b>

## Appendix A2: HRA Capital Programme

	Revised Budget 2025/26 £m	Forecast 2025/26 £m	Cost Variance 2025/26 £m	Rephasing Variance 2025/26 £m	5 Year Budget £m	5 Year Forecast £m	5 Year Variance £m	Total Council Resources £m	5 Year Grants and Contribution £m	5-Year Forecast Spend £m
<b>HRA Major Projects</b>										
<b>Resident's Services</b>										
Acquisitions	115.6	115.6	0	0	115.6	115.6	0.0	60.8	45.5	115.6
Development Allocated	26.7	18.8	0	(7.8)	123.9	123.9	(0.0)	20.8	93.0	123.9
HRA General Contingency	0	0	0	0	0	0	0	0	0	0
<b>Resident's Services Total</b>	<b>142.2</b>	<b>134.4</b>	<b>0</b>	<b>(7.8)</b>	<b>239.5</b>	<b>239.5</b>	<b>0.0</b>	<b>81.6</b>	<b>138.5</b>	<b>239.5</b>
<b>HRA Major Projects Total</b>	<b>142.2</b>	<b>134.4</b>	<b>0</b>	<b>(7.8)</b>	<b>239.5</b>	<b>239.5</b>	<b>0.0</b>	<b>81.6</b>	<b>138.5</b>	<b>239.5</b>
<b>HRA Programme of works</b>										
<b>Resident's Services</b>										
HRA Works to Stock Programme	36.9	35.9	0	(1.0)	136.5	136.5	0	63.0	5.0	136.5
Green Homes Initiatives Programme	14.1	9.1	0	(5.0)	44.9	44.9	0	16.5	7.6	44.9
Major Adaptations	3.2	3.2	0	0	17.2	17.2	0	6.0	0	17.2
House Extension Programme	2.8	0.5	0	(2.3)	6.8	6.8	0	1.7	0	6.8
Food Waste Housing Units for Communal Properties	0.3	0.3	0	0	0.3	0.3	0	0.3	0	0.3
HRA Corporate Technology	0	0	0	0	0	0	0	0	0	0
<b>Resident's Services Total</b>	<b>57.3</b>	<b>49.0</b>	<b>0</b>	<b>(8.3)</b>	<b>205.6</b>	<b>205.6</b>	<b>0</b>	<b>87.6</b>	<b>12.6</b>	<b>205.6</b>
<b>HRA Programme of works Total</b>	<b>57.3</b>	<b>49.0</b>	<b>0</b>	<b>(8.3)</b>	<b>205.6</b>	<b>205.6</b>	<b>0</b>	<b>87.6</b>	<b>12.6</b>	<b>205.6</b>
<b>HRA Regeneration</b>										
<b>Resident's Services</b>										
Hayes Regeneration	19.6	19.6	0	0	104.1	104.1	0	55.9	42.9	104.1
<b>Resident's Services Total</b>	<b>19.6</b>	<b>19.6</b>	<b>0</b>	<b>0</b>	<b>104.1</b>	<b>104.1</b>	<b>0</b>	<b>55.9</b>	<b>42.9</b>	<b>104.1</b>
<b>HRA Regeneration Total</b>	<b>19.6</b>	<b>19.6</b>	<b>0</b>	<b>0</b>	<b>104.1</b>	<b>104.1</b>	<b>0</b>	<b>55.9</b>	<b>42.9</b>	<b>104.1</b>
<b>Grand Total</b>	<b>219.1</b>	<b>203.0</b>	<b>0</b>	<b>(16.1)</b>	<b>549.2</b>	<b>549.2</b>	<b>0.0</b>	<b>225.1</b>	<b>194.0</b>	<b>549.2</b>

## PART B: FINANCIAL RECOMMENDATIONS

That:

- a. the budget virement of £8,850k from the General Contingency budget to resolve underlying budget pressures that are currently being covered by the release of these funds, be approved.
- b. the introduction of non-commercial photography fees for the use of council-owned green spaces for engagement or wedding photography, be approved.

### Reasons for recommendation

108. **Recommendation a** – Following Cabinet's approval to release the full contingency budget in 2025/26, it is recommended that £8.9m of the initial £10.5m available budget is allocated to service areas where there is a direct relationship between the contingency cover and the service spend, including funding for the pay award shortfall with the balance being vired to support Adult Social Care placements.
109. **Recommendation b** – The council's film office has a charge for commercial photography as part of its rate card but has received enquiries relating to using green spaces, specifically Eastcote House Gardens, for engagement and wedding photography shoots. It is recommended to introduce a £100 admin fee and location fee of £100 per hour for up to five people (including the photographer) and £125 per hour for a maximum of 10 people (including the photographer).

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## PUBLIC PREVIEW:

### *MATTERS TO BE CONSIDERED LATER IN PRIVATE*

<b>Cabinet Member(s)</b>	As appropriate
<b>Cabinet Portfolio(s)</b>	As appropriate
<b>Officer Contact(s)</b>	Mark Braddock – Democratic Services
<b>Papers with report</b>	None

## HEADLINES

<b>Summary</b>	<p>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.</p> <p>This will enable Cabinet Members to openly discuss such matters generally in public, and via the Council's live broadcast of the meeting, without prejudicing their later consideration in private.</p>
<b>Putting our Residents First</b>  <b>Delivering on the Council Strategy 2022-2026</b>	<p>This report supports our ambition for residents / the Council of: An efficient, well-run, digital-enabled council working with partners to deliver services to improve the lives of all our residents</p> <p>This report supports our commitments to residents of: A Digital-Enabled, Modern, Well-Run Council</p>
<b>Financial Cost</b>	As set out in the report.
<b>Relevant Select Committee</b>	As set out in this report under each item – however, this item is not for scrutiny call-in as it is information only.
<b>Ward(s)</b>	As set out in the report

## RECOMMENDATION

**That Cabinet note the reports to be considered later in private and Part 2 of the Cabinet agenda and comment on them as appropriate for public information purposes.**

## Reasons for recommendation

### Why are certain reports considered in private?

As a transparent, democratic organisation, the Council's Cabinet will consider matters in public on Part 1 of this Cabinet agenda. However, there will inevitably be some reports that will need to be considered in private. These would generally relate to contracts, property transactions or commercially sensitive information, for example, tender bids from commercial organisations, which if made public, could prejudice the Council's ability secure value-for-money for resident taxpayers.

This information is also called 'exempt' information and is considered in Part 2 of any Cabinet agenda by applying the relevant section of the Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended), in that the report contains certain information and that the public interest in withholding that information outweighs the public interest in disclosing it.

### How can the public find out more about the private reports?

To ensure maximum transparency when the Cabinet considers such private reports:

- 1) They are first given advance notice on the Cabinet's Forward Plan in summary form setting out the reason why they will be considered in private. The [Forward Plan](#) is a public document setting out all the expected decisions the Cabinet will make over the coming year, except those that are urgent, and is available on the Council's website to view;
- 2) This report provides a fuller public preview of the matters to be discussed in Part 2 of this Cabinet meeting and gives an opportunity for Cabinet Members to highlight issues of significance within and for public information purposes, without prejudicing their later fuller consideration in private. It also sets out the recommendations in general terms that are being proposed for a decision on.
- 3) Consideration of this report will also be broadcast live on the Council's YouTube channel: Hillingdon London, and available for viewing afterwards, for wider democratic engagement.
- 4) After these private reports are considered in Part 2 of this Cabinet meeting, Cabinet's full decisions on them will then be published on the Council's website the day after the Cabinet meeting, along with the decisions on the other matters already considered in public.

## Alternative options considered

Cabinet could resolve to release any private report into the public domain in extraordinary or highly exceptional cases, where it considers the public interest in disclosing the information outweighs the public interest in withholding it. However, to ensure greater transparency on all private matters considered, this public preview item is advised as the most suitable way forward.

## Legal comments

Such private matters are considered in accordance with Local Government Act 1972 (as amended) Access to Information provisions and also The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012. This report enables such matters to be discussed in public as far as is possible under the relevant legislation.



## SUPPORTING INFORMATION

### ITEM 10 - CORPORATE DISPOSALS PROGRAMME 2025/26 - MAD BESS WOOD COTTAGE, HAREFIELD

Relevant Cabinet Members	Councillor Jonathan Bianco, Cabinet Member for Corporate Services & Property
Relevant Ward(s)	Ruislip
Relevant Select Committee	Corporate Resources & Infrastructure

#### Information

Mad Bess Wood Cottage is a three-bedroom detached house located about two miles from Ruislip High Street. Following the service tenancy coming to an end, Cabinet will consider the disposal and sale of the cottage on the open market, contributing to the Council's Annual Disposal Target.

### ITEM 11 - CORPORATE DISPOSALS PROGRAMME 2025/26 - FORMER CARETAKERS HOUSE, WHITEHEATH JUNIOR SCHOOL, RUISLIP

Relevant Cabinet Members	Councillor Jonathan Bianco, Cabinet Member for Corporate Services & Property
Relevant Ward(s)	Ruislip
Relevant Select Committee	Corporate Resources & Infrastructure

#### Information

The report proposes the disposal and sale of the Caretaker's House at Whiteheath Junior School, Ruislip, as part of the Council's Corporate Disposals Programme for 2025/26. The property was previously used as tied accommodation, but the house has been vacated and surrendered back to the Council. Education Services have confirmed there is no further educational need for the property.

### ITEM 12 - CORPORATE DISPOSAL PROGRAMME 2025/26 - APPROPRIATION OF FORMER CARETAKERS HOUSE, 12 FORE STREET, EASTCOTE

Relevant Cabinet Members	Councillor Jonathan Bianco, Cabinet Member for Corporate Services & Property
Relevant Ward(s)	Eastcote
Relevant Select Committee	Corporate Resources & Infrastructure

#### Information

The report seeks Cabinet approval for the appropriation (transfer of use or ownership) of a former caretaker's house at 12 Fore Street, Eastcote, as part of the Council's wider Corporate Disposal Programme for 2025/26. The property is currently vacant and is deemed suitable for being transferred to the Housing Revenue Account, for use as part of the Council's housing portfolio supporting residents in housing need.

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