

WEST LONDON WASTE PLAN REGULATION 18 CONSULTATION

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

HEADLINES

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

RECOMMENDATIONS

That:

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

Reasons for recommendations

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 The current plan was adopted in 2015 and is considered in many respects to be out-of-date in the context of national and regional planning policy and therefore needs to be replaced.

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

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

Alternative options considered / risk management

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

Democratic compliance / previous authority

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

Select Committee comments

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

SUPPORTING INFORMATION

Why is the waste plan being reviewed?

The National Planning Policy Framework (NPPF) requires local plans to be reviewed and updated as necessary at least once every five years. After this, plans or parts of plans may be regarded as not being up-to-date and may be given less weight in planning decision-making.

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

Key elements of the emerging WLWP

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

Waste arisings in West London

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

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

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

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

Vision and objectives

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

WLWP policies

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

The draft updated WLWP contains the following policies:

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

Safeguarded sites

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

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

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

Integrated Impact Assessment and Evidence Base for the draft WLWP

Land Use Consultants (LUC) were commissioned in October 2023 to undertake an Integrated Impact Assessment (IIA), comprising the Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA), and Habitats Regulations Assessment (HRA) for the draft WLWP. The IIA appraises the likely environmental, social and economic effects of the vision, objectives and policies. The IIA Report will be published as part of the consultation on the Regulation 18 of the WLWP. The HRA specifically focuses on the potential effects of the WLWP on certain designated nature conservation sites, and is contained in a separate HRA report, which will also be published for consultation.

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

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

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

Other evidence

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

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

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

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

Next steps in the plan making process

Subject to Cabinet approval, the Regulation 18 draft updated WLWP will be issued for consultation over an eight-week period commencing in November/December 2025. Following the closure of the consultation, the responses received will be analysed and the findings used to inform the production of the Regulation 19 version of the Plan that boroughs intend to submit for examination. This version of the WLWP will return to Cabinet for approval, 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