Strategic Cooperation Statement

Submission Version (2026)

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Abbreviations

- DtC - Duty to Cooperate
- EA - Environment Agency
- EoEWTAB - East of England Waste Technical Advisory Body
- GLA - Greater London Authority
- LBTH - London Borough of Tower Hamlets
- LP - London Plan
- LWPF - London Waste Planning Forum
- NPPF - National Planning Policy Framework
- NPPW - National Planning Policy for Waste
- OPDC - Old Oak and Park Royal Development Corporation
- PPG - Planning Practice Guidance
- SEWPAG - South East Waste Planning Advisory Group
- SoCG - Statement of Common Ground
- Reg 18 / Reg 19 - Regulation 18 / Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended
- WPA - Waste Planning Authority
- WLLPAs - West London Local Planning Authorities
- WLWA - West London Waste Authority
- WLWP - West London Waste Plan

1 Introduction

1.1 This Strategic Cooperation Statement, (hereinafter referred to as 'this Statement') has been produced to support the new West London Waste Plan 2026 to 2041 (WLWP). The new WLWP has been prepared by the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, and Richmond upon Thames plus the Old Oak and Park Royal Development Corporation (OPDC) (for the area of west London that falls within its scope), collectively referred to as the West London Local Planning Authorities (WLLPAs). This Statement sets out the approach and steps taken by the WLLPAs to engage and collaborate with other bodies/organisations while preparing the new WLWP, including those with specific interests in strategic planning for waste in west London. Some of these bodies may have been formerly subject to the Duty to Cooperate, but this was rescinded as a legal compliance matter for plan production with effect from 25 March 2026.

1.2 This Statement has been prepared to accompany the version of the WLWP submitted to the Secretary of State for examination in accordance with Regulation 22 of the plan making Regulations[1]. This Statement demonstrates that the preparation of the new WLWP was undertaken in accordance with the expectation for ongoing cooperation set out in the National Planning Policy Framework (NPPF). This Statement is therefore intended to inform the part of the independent examination concerned with determining whether the Plan is consistent with national policy requirements.

1.3 It has been prepared in accordance with the Planning Inspectorate legacy Procedure Guide for Local Plan Examinations[2] that expects a statement identifying strategic matters, agreements/disagreements, engagement and influence on the Plan.

1.4 In accordance with the NPPF, the WLLPAs have engaged positively with other authorities as well as statutory bodies through the preparation of the Plan and this remains an ongoing process. Statements of Common Ground (SoCG) will be prepared where appropriate and published once agreed. Any updates to the matters set out in this Statement, including completed SoCGs, will be published

[1] Town & Country Planning (Local Planning) (England) Regulations 2012
[2] https://www.gov.uk/government/publications/examining-local-plans-procedural-practice/procedure-guide-for-local-plan-examinations

separately and should be read alongside it.

1.5 A separate Consultation Statement, providing information required by Regulation 22 of the plan making regulations, has also been prepared. The Consultation Statement sets out how the WLLPAs have engaged with the public, statutory consultees and other organisations during the preparation of the new WLWP. It summarises the representations received during both consultation stages - Regulation 18 Draft WLWP and Regulation 19 Proposed Submission WLWP. This Strategic Statement of Cooperation should be read alongside the Consultation Statement.

2 Policy Context

2.1 The NPPF expects local planning authorities to work collaboratively on strategic matters that cross administrative boundaries. For waste planning, relevant strategic matters include making sufficient provision for waste management capacity and infrastructure and cross boundary relationships, including strategic movements of waste between the WLWP area and other waste planning authority boundaries, and any associated strategic environmental, transport, and other infrastructure considerations.

2.2 The WLWP is being prepared under the transitional arrangements for the legacy plan-making system. Whilst the statutory Duty to Cooperate no longer applies to plan-making, national policy continues to emphasise the importance of effective cooperation on strategic cross-boundary matters and the preparation of Statements of Common Ground (SoCG) where appropriate.

2.3 The WLWP has been prepared in this context. The Plan has been informed by engagement with neighbouring and other planning authorities, statutory bodies, infrastructure providers, and other relevant organisations. This includes engagement on waste management capacity and waste movements within west London, across London and beyond, recognising the strategic nature of waste planning and the role of cross-boundary movements in managing waste arisings.

3 What are the strategic planning matters?

3.1 Waste management is inherently a strategic planning matter as waste often arises in one area and is managed in another. Waste management facilities may also serve catchments extending beyond local planning authority boundaries. Consequently, the planning and provision of waste management capacity requires cooperation between waste planning authorities and other relevant organisations.

3.2 In the context of the WLWP, the principal strategic matters are considered to primarily relate to:

- The management of waste capacity and dealing with surplus capacity in west London;
- The future availability of non-hazardous landfill capacity; and
- Continued access to facilities receiving strategically significant waste exports from west London.

These issues are considered in more detail below.

Waste Management Capacity and Cross-Boundary Needs

3.3 The London Plan apportions waste management capacity requirements to London boroughs and allows boroughs to work together to meet those requirements through joint waste plans[3]. The west London boroughs have prepared the WLWP jointly as part of this approach.

3.4 The WLWP identifies a surplus waste management capacity within west London. Through the WLWP consultation process, requests to share this surplus capacity were received from waste planning authorities who state that they have unmet needs. This raises strategic cross-boundary issues regarding whether or not this unmet need could be accommodated in the WLWP area.

3.5 The London Plan 2021[4] expects Boroughs considering the release of safeguarded waste sites to engage with London boroughs facing a shortfall in waste capacity, before such sites are released. Boroughs seeking to release sites may only do so if existing waste management capacity exceeds their Plan area management requirements (prescribed by the London Plan for HIC

[3] Paragraph 9.8.6

[4] Paragraph 9.8.6

waste and determined locally for other waste types).

3.6 Evidence prepared to support the WLWP identifies surplus waste management capacity in west London for both household, industrial and commercial (HIC) waste and construction and demolition (C&D) waste. The Plan proposes the release of six safeguarded waste sites identified in Appendix 6 of the Plan. The implications of the proposed releases have been assessed through the evidence base, including the 'Assessment of Existing Waste Sites for Release (July 2026)' document.

3.7 The availability of surplus waste management capacity within west London was identified through the references in the Plan and the details in the evidence base published as part of the Regulation 18 and Regulation 19 consultations. This enabled other London boroughs to consider this in relation to their own position, in terms of whether there might be a potential need for reliance on capacity within west London when planning for their future waste management needs. Requests regarding reliance on surplus capacity were subsequently received from the London Borough of Tower Hamlets (LBTH), Westminster City Council (WCC) and the London Borough of Lambeth (LBL). However, LBL subsequently confirmed it was no longer seeking capacity. Discussions with LBTH and WCC are on-going, and Statements of Common Ground are being prepared with these remaining authorities.

3.8 This matter has also been subject to discussion with the Greater London Authority (GLA). In response to the Regulation 19 consultation, the Mayor raised concerns regarding the proposed release of safeguarded waste sites and the approach to surplus capacity. Discussions with the GLA are on-going and a Statement of Common Ground is being prepared.

Future Availability of Non-Hazardous Waste Landfill Capacity

3.9 National policy and legislation seeks to minimise the amount of waste managed through landfill. This is reflected in the continual decline in the amount of waste requiring landfill disposal. Despite the amount of waste arising in west London being managed by landfill reducing significantly, there is likely to be a limited (and reducing) quantity of non-hazardous residual waste for which disposal to landfill remains the only viable management option. Therefore, there is still a residual requirement for non-hazardous landfill capacity to remain through the Plan period.

3.10 As the amount of waste managed through landfill has reduced, fewer non-hazardous landfill sites remain in operation and those that do, typically serve wider catchment areas. Such facilities therefore perform a strategic function in

the management of waste.

3.11 Opportunities for new non-hazardous landfill development within west London are limited. Consequently, any remaining requirement for landfill disposal is likely to continue to be met at facilities outside the Plan area. The continued availability of suitable landfill capacity is therefore a strategic cross-boundary matter. The WLLPAs have therefore sought to establish where other landfill capacity exists, or might come forward, that might serve to meet west London's future needs for the management of non-hazardous waste requiring landfill through engagement with host waste planning authorities (details are included in Appendix 6 of this Statement).

Strategically Significant Waste Exports

3.12 Although west London benefits from substantial waste management capacity and is a net importer of waste overall, certain waste streams continue to be managed at facilities outside the Plan area.

3.13 In particular, inert excavation waste and hazardous waste are commonly managed at specialist facilities serving wider catchment areas. Owing to the nature of these waste streams and economies of scale, such facilities are often located outside west London and may serve several waste planning authority areas.

3.14 The continued availability of these facilities is important to the implementation of the WLWP and therefore represents a strategic cross-boundary matter. Evidence prepared to support the Plan identifies the facilities receiving strategically significant quantities of waste from West London and engagement has been undertaken with the relevant host waste planning authorities to understand the likely availability of this capacity during the Plan period.

3.15 Responses received through this process are summarised elsewhere in this statement and the supporting evidence base.

4 Organisations Engaged on Strategic Matters

4.1 During the preparation of the new WLWP, the WLLPAs have engaged with a range of organisations relevant to the strategic matters identified in section 3. These included neighbouring and other waste planning authorities, London boroughs, the Greater London Authority (GLA) and other statutory consultees. Full details of engagement activities are set out in Section 5 of this Statement.

Waste Planning Authorities

4.2 Waste Planning Authorities (WPAs) with which west London may have a strategic relationship were identified through analysis of strategically significant waste movements and consideration of future waste management capacity requirements. This included authorities hosting facilities receiving strategically significant quantities of waste from west London, together with authorities relevant to the future availability of landfill and specialist waste management capacity. More details are included in the 'Strategically Significant Waste Flows' report[5].

4.3 These authorities were contacted to discuss strategic waste management matters relevant to the preparation of the WLWP, including future capacity, cross-boundary waste movements and the continued availability of facilities serving West London. Outside of London, the neighbouring authorities are generally two tier with waste disposal dealt with at a unitary level by County Councils, however district or borough Councils within Surrey, Berkshire, Buckinghamshire and Hertfordshire with whom a boundary is shared, were also notified of the preparation of the WLWP.

Table 1: WPAs contacted

WPAs contacted		
Buckinghamshire*	LB Enfield†	Slough*
Cambridgeshire *	Royal Borough of Greenwich*	South Gloucestershire*
Hertfordshire*	LB Newham†	Suffolk*
Kent*	Milton Keynes*	Surrey*
	Sandwell†	Thurrock*

Key: * Hosts a facility that received strategically significant amounts of waste from West London in 2023.
† Identified in 2021/2022 data but not in 2023.

4.4 The WPAs listed above were also notified regarding the publication of the Proposed Submission WLWP in August 2026 and invited to make representations.

London Local Planning Authorities

4.5 All London Boroughs and the City of London were notified of the preparation of the WLWP and consulted at the Regulation 18 and Regulation 19 stages. The

[5] *Strategically Significant Waste Flows from West London in 2023*, BPP Consulting, July 2026

Plan referenced the evidence indicating a potential surplus of waste management capacity within west London and boroughs were invited to provide a view on the implications of this evidence and any relevance to planning for waste management needs in their respective areas.

Greater London Authority (GLA)

4.6 The Greater London Authority (GLA) was engaged throughout the preparation of the WLWP on matters relating to the Plan's general conformity with the 2021 London Plan.

Waste Technical Advisory Bodies

4.7 Waste Technical Advisory Bodies (WTABs) facilitate cooperation and coordination on strategic waste planning matters that extend beyond administrative boundaries and bring together Waste Planning Authorities and other relevant organisations.

4.8 In London, the Waste Technical Advisory Body is the London Waste Planning Forum (LWPF). The LWPF brings together all the London Boroughs and includes other organisations such as the Mayor of London, the Environment Agency, and representatives of the waste management industry to discuss strategic waste planning matters affecting London. More details are included in the LWPF terms of reference included in Appendix 2.

4.9 There are also neighbouring advisory Waste Technical Advisory Bodies covering the South East and East of England, who each coordinate at a regional level across the Waste Planning Authorities in their respective areas. The South East Waste Planning Advisory Group (SEWPAG) and East of England Waste Technical Advisory Body (EoEWTAB) representatives are included in the LWPF Terms of Reference *(please see Appendix 2 for the Terms of Reference)*.

Other Strategic Waste Authorities

4.10 Engagement was also undertaken with the West London Waste Authority (WLWA) who are the Waste Disposal Authority for west London and therefore have strategic responsibility for managing and/or planning of waste across the Plan area.

Other Strategic Consultees

4.11 In addition to local planning authorities and waste planning authorities, engagement was undertaken with a range of organisations with responsibilities relevant to the preparation of the WLWP, including:

- Civil Aviation Authority
- Environment Agency
- Historic England
- Marine Management Organisation
- National Highways
- NHS (West and North London and South West London Integrated Care Boards)
- Natural England
- Network Rail
- Office of Rail and Road
- Transport for London
- London Local Nature Partnership

5 Cooperative Activities and Outcomes

5.1 This section summarises the cooperation activities undertaken by the WLWPA during the preparation of the WLWP. It identifies the key authorities and organisations engaged, the strategic matters discussed, the engagement undertaken and the outcomes arising from that cooperation. Where relevant, references are made to representations submitted on the Proposed Submission WLWP and the ongoing preparation of Statements of Common Ground. Detailed summaries of the consultation responses are contained within the Consultation Statement.

Joint Preparation of WLWP

5.2 In line with Policy SI8 of the London Plan 2021, the WLWP has been prepared jointly by the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond upon Thames, and Old Oak and Park Royal Development Corporation. The WLWP provides a shared framework for planning and managing waste across the sub-region.

5.3 A Memorandum of Understanding (MoU) was entered into by January 2024 to facilitate the joint preparation of the Plan and supporting evidence base. Joint plan preparation commenced later in 2024 and included the preparation of evidence relating to waste management capacity, waste movements, landfill provision and the safeguarding of existing waste sites within the Plan area.

5.4 Key milestones have included the publication of the Regulation 18 Draft WLWP between 11th December 2025 and 5th February 2026, the publication of

the Regulation 19 Proposed Submission WLWP between 4th August and 28th September 2026, and the preparation for submission of the WLWP for independent examination in late 2026. Further details of the joint consultation activities undertaken as part of the process is detailed within the Consultation Statement.

Engagement Through the London Waste Planning Forum

5.5 Throughout the preparation of the WLWP, the WLLPAs have regularly attended and participated in the London Waste Planning Forum (LWPF), which is attended by all London local planning authorities, the Greater London Authority (GLA), Environment Agency, South East Waste Planning Advisory Group (SEWPAG) and East of England Waste Technical Advisory Body (EoEWTAB). Please refer to Appendix 2 of this Statement for the LWPF Terms of Reference.

5.6 The LWPF has provided an important mechanism for discussing strategic waste planning matters affecting London and adjoining areas. During the preparation of the WLWP, updates were provided, including on the commencement of the review, the Regulation 18 consultation, and the Regulation 19 consultation. Members of the LWPF were encouraged to engage in the consultation material.

5.7 LWPF meetings attended by the WLLPAs during the preparation of the Plan included:

- 26th March 2025 – *activities TBC*
- 11th June 2025 – *activities TBC*
- 5th November 2025 – *Provided update on the progress of the WLWP and expected timeframe for the commencement of Regulation 18 consultation*
- 29th April 2026 – *Provided update on progress of the WLWP and anticipated timeframes for the commencement of Regulation 19 consultation.*
- 8th September 2026 – *Reminded LWPF members that the Regulation 19 consultation was still open and was closing on the 28th September 2026. Encouraged members to participate.*

5.8 This engagement helped raise awareness of the emerging WLWP and its supporting evidence base, provided opportunities for early discussion on strategic waste planning matters and informed subsequent engagement with individual London boroughs and strategic stakeholders. The Forum also

facilitated discussions of strategic waste planning issues affecting London, including waste management capacity requirements, strategic waste movement, and emerging evidence relevant to the preparation of local waste plans and the review of the London Plan.

Engagement with the Greater London Authority (GLA)

5.9 The WLWPAs have engaged regularly with Officers of the GLA throughout the preparation of the WLWP. Discussions focused principally on the Plan's general conformity with the London Plan 2021, including around the approach towards assessing capacity, the definition of an existing waste site, proposed release of safeguarded waste sites, arrangements for providing compensatory capacity and opportunities for sharing surplus waste management capacity with London boroughs who have identified unmet waste needs.

5.10 Meetings took place on the 5th November 2025, 23rd July 2025, 9th January 2026, 29th April 2026, and 8th September 2026. Ongoing dialogue has continued through the exchange of further information and clarification on matters arising from these discussions.

5.11 Through this engagement, the GLA advised that London boroughs should be afforded the opportunity to identify reliance on surplus waste management capacity within west London. This has resulted in amendments to the WLWP to clarify the mechanisms through which other boroughs may rely upon surplus capacity in west London where appropriate.

5.12 The Mayor's representation on the Proposed Submission WLWP (Regulation 19) raised general conformity concerns regarding the proposed release of safeguarded waste management sites without compensatory capacity provision combined with the failure to offer surplus capacity to London boroughs with a shortfall in the ability to meet their waste needs prior to this release. However, the Mayor confirmed that the release of the former Quattro site, Victoria Road, would be acceptable. These matters continue to be addressed through ongoing engagement with the GLA and preparation of a Statement of Common Ground.

Engagement with Other London Boroughs

Westminster City Council (WCC)

5.13 Engagement with Westminster City Council (WCC) focused on Westminster's request for surplus waste management capacity within west London to be shared with WCC.

5.14 Following initial correspondence on 21st September 2025, after our initial email informing all London Boroughs of the progress of the review of the WLWP and forthcoming Regulation 18 consultation, further discussions took place regarding Westminster's emerging waste management requirements, including a meeting on the 12th December 2025 and subsequent correspondence during 2026.

5.15 The initial engagement contributed to the development of the WLWP policy wording for Regulation 18 Draft WLWP to clarify the potential mechanisms for London Boroughs with unmet waste needs to meet waste management capacity requirements via surplus capacity in west London where sites were to be released. As well as development of the criteria relating to requests for surplus capacity.

5.16 On the 16th June 2026 the WLLPAs sent a letter to WCC setting out criteria for how WLLPAs would assess their request to share capacity and sought additional information from WCC to understand WCC's evidence base and unmet waste need in more detail. WCC subsequently submitted supporting evidence regarding its identified needs on the 14th August 2026. At the time of writing, the response has been reviewed and further clarification is required regarding the assessment of local capacity, how site options were considered and existing cross-boundary arrangement. Discussions are ongoing and have informed the preparation of a Statement of Common Ground.

5.17 In WCC's representation on the Proposed Submission WLWP (Regulation 19), Westminster expressed support for the Plan and emphasised the importance of retaining policy support for using surplus capacity within west London to help address identified waste management needs elsewhere in London.

London Borough of Tower Hamlets (LBTH)

5.18 The WLWPAs have engaged extensively with the London Borough of Tower Hamlets (LBTH) regarding its identified waste management capacity requirements.

5.19 A request for assistance in meeting London Plan waste apportionment requirements was initially received during the preparation of the LBTH's Local

Plan in October 2024 and was subsequently formalised through correspondence received on the 20th June 2025. Discussions included an Officer meeting on the 18th December 2025 and subsequent correspondence during 2026 concerning the assessment of requests for surplus capacity. The WLLPAs requested additional information to understand LBTH's evidence base and unmet waste need in more detail on 16th June 2026. LBTH subsequently submitted supporting evidence regarding its identified needs on the 20th August 2026.

5.20 The engagement informed amendments to the Regulation 19 Proposed Submission WLWP, to further clarify the mechanisms of how surplus waste management capacity within West London may assist boroughs with identified waste management deficits. A Statement of Common Ground is currently being prepared.

5.21 LBTH's representation on the Proposed Submission WLWP (Regulation 19) confirmed the continued request that surplus waste management capacity identified within west London should contribute towards meeting its identified waste management capacity shortfall. LBTH also sought the inclusion of capacity-sharing assessment criteria within the Plan. These matters have formed part of the ongoing engagement between the authorities and are being progressed through continued dialogue and the preparation of a Statement of Common Ground.

London Borough of Lambeth (LBL)

5.22 The WLLPAs engaged with the London Borough of Lambeth (LBL) regarding whether it anticipated a need to rely on surplus waste management capacity within west London to meet its waste apportionments.

5.23 Correspondence received on the 10th July 2026 confirmed that Lambeth was not seeking to rely on surplus waste management capacity within west London. As a result, no further engagement was required on this matter.

5.24 LBL raised no concerns regarding the Proposed Submission WLWP (Regulation 19) and did not identify any strategic cross-boundary issues requiring further ongoing cooperation.

Engagement with West London Waste Authority (WLWA)

5.25 The WLLPAs engaged with the West London Waste Authority (WLWA) during

the preparation of the WLWP, including meetings held on the 7th March 2025 and the 11th June 2025 to discuss the emerging Regulation 18 Draft Plan and supporting evidence base.

5.26 Discussions focused on the operational waste management infrastructure within west London, including assumptions used in the waste capacity assessment and information relating to facilities operated by, or on behalf, of the constituent authorities.

5.27 Engagement with the WLWA informed both the Regulation 18 Draft WLWP and its supporting evidence base. In particular, capacity assumptions relating to local authority/WLWA operated waste management facilities were refined following discussions with the WLWA, including decisions not to apply the standard 15% capacity uplift to local authority/WLWA operated waste sites. Information provided by the WLWA also informed the assessment of the Acton Circular Economy Hub (site ref no: E02), with the WLWA's site's capacity calculated using operational data relating to the reuse facility at Twyford WTS Abbey Road (site ref: no: B01).

5.28 This engagement helped ensure that waste capacity assumptions used within the WLWP and supporting evidence reflected current operational arrangements, and were informed by the best available information available regarding waste management infrastructure serving west London, thereby improving the robustness of the supporting evidence base.

Engagement with Waste Planning Authorities

5.29 The WLLPAs engaged with a range of Waste Planning Authorities that host facilities receiving strategically significant waste flows from west London. Engagement was undertaken through direct correspondence, targeted requests for information via a letter sent on the 23rd October 2025, and formal consultation on both the Regulation 18 and Regulation 19 consultation stages.

5.30 The engagement focused on strategic cross-boundary matters including:

- The continued export of waste from west London to facilities outside of the Plan area.
- The future availability of non-hazardous and inert landfill capacity.
- The resilience of existing waste management arrangements.
- The future operation of facilities receiving waste from West London.
- Any strategic issue or constraints affecting the continued management of

waste arising within west London.

5.31 As part of the preparation of the WLWP, letters were sent to authorities hosting facilities receiving strategically significant quantities of waste from west London seeking information on future waste management capacity, landfill provision and the continued operation of facilities relied upon by west London. Responses were received from a number of authorities, including Cambridgeshire and Peterborough, Surrey, Suffolk, Hertfordshire, Slough, South Gloucestershire, and the Royal Borough of Greenwich.

5.32 The responses provided valuable evidence regarding the future capacity and operational life of facilities receiving waste from west London and confirmed that existing arrangements for managing waste arising in west London remain generally robust. The exercise also identified a number of future changes to waste management infrastructure, including the anticipated closure of Buckden Landfill at the end of 2026, Patteson Court Landfill on 31 December 2030, and Barrington Works Landfill on 31 December 2033. Surrey County Council also identified the closure of Homers Farm Inert Landfill in September 2024 and noted the potential future pressures on inert landfill capacity.

5.33 The engagement improved understanding of how waste arising in west London is managed across administrative boundaries and provided greater clarity regarding the capacity, lifespan, and planning context of facilities that form part of the wider waste management network serving the Plan area. It also highlighted the importance of continuing to monitor waste movements and maintain dialogue with authorities receiving waste from west London throughout the Plan period.

5.34 The findings of this engagement informed the WLWP evidence base, including the assessment of strategically significant waste flows, future landfill availability and the resilience of existing waste management arrangements.

5.35 Consultation on the Proposed Submission (Regulation 19) broadly reinforced the matters identified through earlier engagement. Oxfordshire County Council highlighted the strategic importance of waste movements to Sutton Courtenay Landfill and sought further clarification regarding assumptions relating to the continuity of those flows following the anticipated closure of the facility in 2030. Surrey County Council reiterated previously identified landfill closure dates, whilst Suffolk County Council confirmed that waste flows to facilities within Suffolk remain manageable. Spelthorne Borough Council highlighted the importance of continued monitoring of strategic waste management

infrastructure serving west London, including Lakeside Energy from Waste Facility and the implications of any Heathrow Airport expansion proposals.

5.36 This engagement with neighbouring Waste Planning Authorities has contributed to a clearer understanding of the opportunities and challenges associated with cross-boundary waste movements and has helped ensure that the WLWP is informed by the best available information regarding facilities serving the west London area. No significant concerns regarding the effectiveness of cooperation were raised by other responding Waste Planning Authorities.

Engagement with Technical Advisory Bodies

5.37 The WLLPAs have engaged with the Environment Agency, SEWPAG and EoEWTAB through the London Waste Planning Forum (LWPF), strategic waste flow discussions and formal consultation stages.

5.38 Through its representation on the Proposed Submission WLWP (Regulation 19), the Environment Agency supported continued engagement with SEEWPAG and EoEWTAB, recognising that significant quantities of waste are exported from west London to both regional areas. The Environment Agency also recommended that additional waste movements be considered within the 'Strategically Significant Waste Flows Assessment' dated July 2026.

5.39 This engagement has informed ongoing discussions regarding strategic waste movements and future Statements of Common Ground where appropriate.

Consultation and Ongoing Cooperation

5.40 All relevant London Boroughs, Waste Planning Authorities, Waste Technical Advisory Bodies, and other statutory and waste infrastructure consultees were notified of the Regulation 18 and Regulation 19 consultation stages.

5.41 Representations received at both consultation stages broadly reflected matters already identified through the cooperation activities described in this section. In particular, representations focused on:

- Sharing surplus waste management capacity to assist authorities with identified unmet waste needs;
- The proposed release of safeguarded waste management sites and associated compensatory capacity requirements;

- Future availability of non-hazardous and inert landfill capacity;
- Continued reliance on facilities outside of west London; and
- The identification and monitoring of strategically significant waste flows.

5.42 The WLLPAs continue to engage with relevant authorities and organisations on these matters, including through the preparation of Statements of Common Ground where appropriate.

6 Summary of Cooperation and Next Steps

6.1 Cooperation with statutory consultees, neighbouring and other planning authorities, the Greater London Authority (GLA), host Waste Planning Authorities for facilities receiving strategically significant quantities of waste from West London, and other relevant organisations has informed the preparation of the new WLWP. This includes amendments made between Regulation 18 Draft WLWP and the Regulation 19 Proposed Submission WLWP, the approach to sharing surplus waste management capacity (set out in paragraphs 7.8 and 7.9 of the Plan), and the identification of matters requiring further agreement through Statements of Common Ground (SoCG).

6.2 At the time of writing, discussions remain ongoing in relation to:

- The GLA's opinion on general conformity, including the approach to site release without compensatory capacity and sharing of surplus waste management capacity; and
- Requests from the London Borough of Tower Hamlets and Westminster City Council to share surplus waste management capacity within west London.

6.3 The WLWPAs will continue to engage with relevant authorities up to submission of the WLWP and throughout the examination, including through Statements of Common Ground, the London Waste Planning Forum, and other established co-operation mechanisms. Where relevant, strategic waste matters may also be considered through regional forums and technical advisory bodies. Strategic waste movements and the use of surplus capacity will continue to be monitored through the Authority Monitoring Report (AMR). The latest position on ongoing cooperation will be reported separately at the point of submission.

Appendix 1: Template letter sent to Waste Planning Authorities regarding status of facilities identified as receiving strategically significant amounts of waste from West London and availability of non-hazardous waste landfill capacity

Dear Sir/Madam,

West London Waste Movement Enquiry - Duty to Cooperate Request

This enquiry is sent on behalf of the west London Local Planning Authorities (London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames and Old Oak and Park Royal Development Corporation (OPDC)) to inform development of the emerging updated West London Waste Plan.

The WLWP, originally adopted in 2015, sets out how waste is to be managed across west London up to 2031. The West London Waste Planning Authorities have now commenced the update of the WLWP to ensure that it remains up to date and continues to provide a sound and effective framework for meeting waste management needs in accordance with national policy, the London Plan, and local priorities.

As you will be aware, under Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) Local Planning Authorities are required to engage constructively, actively and on an ongoing basis with relevant authorities in the preparation of development plan documents, particularly where there are strategic and/or cross boundary issues. As such we wanted to make you aware that the draft updated WLWP (Regulation 18 stage) is expected to be published for consultation in Winter 2025/26, subject to it being approved by all seven authorities as part of their respective decision-making processes.

As such we are writing with a Duty to Cooperate (DtC) request regarding waste movements between our respective Waste Planning Authority (WPA) areas as a facility located in [WPA area] has been identified as having received strategic quantities of waste from at least one of the seven west London LPAs in at least one of the most recent years (2021-2023) for which data is available at the time of writing.

Waste movements from west London considered strategic have been identified through the following steps:

1. When the tonnage of west London waste going to a particular Plan area reported in the Environment Agency Waste Data Interrogator (WDI) 2023 cross checked with the Hazardous Waste Interrogator (HWI) 2023 exceeds the following thresholds (as agreed by National Waste TAB Chairs 'Duty to Cooperate on Waste – Practice Guide for Waste Planning Authorities in England'):
    - Non-hazardous waste: 5,000 tonnes per annum
    - Inert waste: 10,000 tonnes per annum
    - Hazardous waste: 500 tonnes per annum (increased from 100t); and
2. Where that waste flow went to a single or small number of sites such that the dependency is greater than if it was distributed across a large number of sites.

Our analysis of the available datasets shows [WPA area] as having received waste from west London in excess of the thresholds set out above, for at least one of the three principal waste streams, and this tonnage going to at least one facility.

The following table shows the destination sites in [WPA area] which received more than 500 tonnes of hazardous waste from west London in 2023.

Table 1: Sites receiving 500 tonnes or more of Hazardous Waste from West London (in 2023)

Site category	Site Name	Operator	Principal Waste Type 500t or more	Tonnes	HWI (Inferred Value)

Given the strategic nature of these flows, it is important for us to ascertain the continued availability of capacity at the receiving facility identified, through to the end of the intended West London Waste Plan period (until 2041).

We therefore request you respond on the following points:

1. Do you consider the information outlined in the table above to be accurate? If not, please explain any discrepancies.
2. Do you agree that the guideline thresholds applied are appropriate to identify strategic movements of waste from west London to your [WPA area]? If not, please explain why, identifying specific concerns such as omissions of flows to sites you consider to be strategic.
3. Does [WPA area] Council expect the facility identified above to remain operational through to 2041?
4. Is [WPA area] Council aware of any planning reasons such as consent conditions, end dates or if the site has been earmarked in local plans for redevelopment that might mean the acceptance of wastes from west London cannot continue through to 2041? If there is no planning reason the Council is aware of, please confirm that the facility is safeguarded for the management of the type of waste shown.
5. Does [WPA area] Council have any specific policies in its local plan concerning providing for the management of waste that arises from outside [WPA area]?
6. Has [WPA area] Council entered into any Statements of Common Ground, or whether correspondence with, other source WPAs concerning the continued availability of

capacity at the facility in question that might compromise continued access to capacity for west London's waste?

7. Do you consider a Statement of Common Ground is necessary considering the cross-boundary movements of waste shown?

8. Given the finite nature of capacity within the Plan area, we also take this opportunity to enquire about the future availability of:

   a. Non-hazardous landfill capacity; and

   b. Permanent deposit to land for inert waste capacity;

   within your Plan area.

   In particular do you anticipate such capacity being available within your Plan area up to 2041, and if so, is there any planning reason why such capacity would not be available to accept waste from west London?

We also welcome any other comment you may have in relation to cross boundary movements of waste between our authorities.

We would be grateful for a response within 21 days of the date of transmission of this letter. If a response is not received from you by the stated date, we shall assume there are no known issues with the continued movement of waste as set out in the table above from west London to [WPA area] to 2041.

Should you have any questions please contact us at info@wlwp.net.

Yours faithfully,

on behalf of West London Waste Planning Authorities.

London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames and Old Oak & Park Royal Development Corporation.

Appendix 2: London Waste Planning Forum Terms of Reference

London Waste Planning Forum

Terms of Reference

1 Aims

a) Provide a framework to support and coordinate waste planning in London
b) Enable authorities to engage and cooperate on strategic waste matters that cross administrative boundaries
c) Encourage a consistent approach to waste planning
d) Consider the implications of London's waste planning for neighbouring authorities
e) Advise on the implications of waste planning policy
f) Raise awareness of waste planning issues and share best practice

2 Activities

a) Considering future waste management needs in London
b) Act as a key stakeholder in the development and delivery of Mayor's Spatial Development Strategy (London Plan)
c) Making representations to central government, regulatory bodies and local government organisations on matters of concern
d) Discussing impacts of new EU and Government legislation and guidance
e) Taking up issues of concern to members
f) Maintaining webpages on waste planning in London to disseminate information
g) Sharing information and best practice
h) Offering support and training related to waste planning
i) Arranging visits to waste facilities

3 Membership

a) All waste planning authorities in London - WPAs in waste planning consortia may choose to be represented by one of the boroughs involved
b) The GLA, LWARB, London Councils and other London organisations dealing with waste
c) Environment Agency
d) Private sector involved with waste planning in London to be coordinated through ESA
e) Community and voluntary sector organisations involved with waste planning in London

f) Representatives from neighbouring regional waste planning fora (East of England and South East England)

g) Other government and non-governmental organisations including waste industry trade bodies and professional bodies as agreed from time to time by the LWPF

4 Conduct of activities

a) The Forum will elect a chair and secretary at the start of each municipal year
b) The chair and secretary will take steps to ensure that members can submit agenda items for meetings
c) Members will nominate a representative and do their best to attend all meetings
d) The Forum may set up subgroups of members which can also include outside representatives to work on defined issues within a defined timescales
e) The Forum may set out a work programme
f) The Forum will meet four times a year

5 Subscriptions

a) The Forum may raise a subscription from its members to fund its activities at a level to be agreed by the Forum

6 Timescale

a) These terms of reference will last for three years and will be reviewed at the start of each municipal year