



HARROW MONITORING GROUP

advocating inclusion so everyone can access - and shape - the services they need

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Harrow Monitoring Group Response to the Regulation 19 Proposed Submission West London Waste Plan Consultation

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24 August 2026

Introduction: who we are and why we are responding

Harrow Monitoring Group (HMG) is an independent community organisation concerned with public services, inclusion, transparency, accountability, value for money and the quality of local decision-making in the London Borough of Harrow. Our work is informed by engagement with residents and by examination of council policies, reports, consultations and governance arrangements.

We are responding to the Proposed Submission West London Waste Plan (WLWP) because this is not simply a technical waste-management document. Once adopted, it will form part of the statutory planning framework and influence decisions about waste-related development across West London until 2041. In Harrow, it proposes the continued safeguarding of two waste sites, at Forward Drive and 151 Pinner View. The consequences of such decisions can be highly local even though the planning strategy is sub-regional.

HMG supports the principle that West London requires a coherent, environmentally sustainable and properly planned approach to waste. Waste must be reduced, reused, recycled and, where necessary, managed through appropriately located facilities. Our concern is therefore not with the existence of a waste plan but with whether this particular Plan adequately demonstrates that its strategic objectives will be achieved fairly, transparently and without imposing disproportionate environmental burdens on particular communities.

Our response is also informed by our earlier examination of Harrow Council's governance of the WLWP. We noted that Harrow Full Council approved Regulation 19 consultation on 2 July

2026 while also delegating authority to officers to consider representations, modify the documents and proceed to submission unless officers determine that consultation produces significant changes to the overall approach. By comparison, Brent retained a final Full Council decision after consultation. We argued that legality and democratic accountability are different tests and that residents should be able to see how their representations have influenced the final document before it is submitted.

Quality and accessibility of the consultation

We welcome the fact that the consultation is available online and that documents can also be inspected at Harrow libraries and the Council Hub. Harrow Council's own consultation information confirms these alternative arrangements.

However, there is a fundamental tension between inviting views from “local communities” and presenting those communities with a consultation whose effective entry point is the specialist language of planning law: legal compliance, general conformity and soundness.

Regulation 19 necessarily operates within a statutory planning framework. We recognise that. But statutory complexity does not remove the responsibility of public authorities to make participation intelligible to ordinary residents.

The volume of supporting material illustrates the problem. Residents are confronted with the Proposed Submission Plan, an Integrated Impact Assessment, Habitats Regulations Assessment, flood-risk assessments, waste-flow and capacity studies, hazardous-waste and construction-waste papers, circular-economy, waste-management and climate-change papers, a consultation statement, protocol, guidance notes and other supporting documents. Much of this evidence is technically necessary. It does not follow that presenting it constitutes meaningful community engagement.

A resident living close to a safeguarded waste site is unlikely to begin with the question: “Is this Plan positively prepared, justified, effective and consistent with national policy?” The questions more likely to matter to that resident are: Will there be more heavy lorries? Which roads will they use? What will happen to air quality? Will there be more noise, dust or odour? What are the risks to children, older people and people already experiencing poor health? Could the site expand? What safeguards will apply if it does? How will impacts from different developments be considered together? And why is this activity located here rather than somewhere else?

The consultation architecture does not foreground those questions sufficiently.

This is particularly important in a diverse borough such as Harrow. Accessibility is not achieved merely because documents can be downloaded or inspected in a library. Genuine accessibility requires plain-English explanations, proportionate summaries, understandable

maps and site-specific information that enables residents to see what a strategic planning decision could mean for their neighbourhood.

The very limited engagement at the earlier stage reinforces this concern. Harrow's Overview and Scrutiny Committee was told that only 77 responses had been received across all participating authorities and that there had been no Harrow-specific comments. Such limited engagement should have prompted a searching examination of whether the consultation methodology was actually reaching affected communities. Absence of representations cannot safely be equated with absence of concern.

What the consultation asks – and what it does not ask

The formal response form asks respondents to identify which part of the Plan their representation concerns, whether they consider the Plan legally compliant and sound, why it is not legally compliant or sound, what modifications are necessary and whether they wish to participate in examination hearings.

Those questions satisfy the procedural requirements of a Regulation 19 consultation, but they are designed principally around the needs of the plan-making and examination process rather than around the way residents experience environmental impacts.

There is no equally prominent invitation to identify whether a safeguarded site creates or reinforces environmental inequality; whether surrounding communities already experience disproportionate environmental pressures; whether HGV movements are likely to affect residential roads; whether vulnerable groups could be disproportionately affected; or whether cumulative effects from waste activity, traffic, housing growth and other development have been adequately assessed.

Nor does the consultation directly ask whether the authorities have succeeded in engaging residents living closest to safeguarded sites. That is an important omission. Consultation quality should not simply be measured by whether an opportunity to respond technically existed. It should consider who actually knew about the consultation, who understood its relevance to them, who participated and which communities remained effectively absent.

The Harrow dimension: environmental justice and cumulative impact

Harrow illustrates why these issues matter.

The Plan identifies two safeguarded Harrow sites: Forward Drive CA Site, operated by Harrow Council, and 151 Pinner View, operated by Harrow Breakers. Published planning material identifies Forward Drive as a waste transfer/civic amenity operation with assessed capacity of

30,757 tonnes per annum, while the Pinner View metal-recycling site has an assessed capacity of 2,247 tonnes per annum and handles hazardous waste.

Harrow is not socially uniform. The Council's own deprivation evidence shows substantial geographical inequalities within the borough. Wealdstone has historically ranked as Harrow's most deprived ward, with Roxbourne , Greenhill and Marlborough also among the most deprived areas. This contrasts markedly with some of the borough's more affluent areas.

This makes environmental justice an essential planning consideration. Waste infrastructure is necessary, but necessary infrastructure should not result in communities already experiencing disadvantage carrying a disproportionate share of environmental burdens.

Heavy vehicle movements are particularly important. Waste facilities do not exist in isolation from the transport network. Their operation can generate HGV and other vehicle movements, with potential consequences for congestion, road safety, noise, emissions and the quality of the pedestrian environment. These effects can extend well beyond the red line of a safeguarded site.

For residents, therefore, the relevant environmental geography is not merely the waste site itself. It includes the roads connecting the facility to the strategic road network and the homes, schools, shops, parks, community facilities and pedestrians along those routes.

The Pinner View site raises a different but equally important issue. Pinner View also provides access to Headstone Manor Park and the historic Headstone Manor complex. Harrow Council describes the park as extending over 50 acres and records significant heritage assets there, including a scheduled monument and four historic listed buildings. The relationship between safeguarded industrial or waste uses and nearby residential, recreational, environmental and heritage assets therefore deserves explicit site-level consideration.

There is also a climate-resilience dimension. The WLWP flood evidence records areas of low, medium and high surface-water flood risk at both Harrow sites. For Forward Drive, such areas occur throughout the site; at 151 Pinner View they are predominantly in the eastern section. The assessment recommends directing future expansion away from high-risk areas and appropriate mitigation.

These are precisely the kinds of interconnected issues that make cumulative assessment important. Flood risk, HGV traffic, air pollution, noise, site expansion, climate change, deprivation and proximity to sensitive receptors should not be considered as unrelated technical boxes.

Question 4: To which parts of the Proposed Submission West London Waste Plan does our response relate?

Our representation relates to the Plan as a whole insofar as it addresses consultation, equality, environmental protection, site safeguarding, implementation and monitoring. More specifically, it relates to the strategic objectives and to Policy WLWP1 on safeguarding waste sites, Policy WLWP2 on additional waste-management capacity, Policy WLWP4 on high-quality and resilient waste facilities, Policy WLWP6 on the circular economy and resource efficiency, the schedule of safeguarded sites, the Integrated Impact Assessment and the monitoring and implementation framework.

It particularly concerns the application of those provisions to HA01 Forward Drive CA Site and HA02 151 Pinner View in Harrow.

Question 5: Do we consider the West London Waste Plan legally compliant and sound?

HMG does not seek to assert, without the benefit of the full evidence available to the planning authorities and ultimately the examining Inspector, that the entire WLWP is legally non-compliant.

Our principal representation is that aspects of the Plan require strengthening before it can convincingly demonstrate soundness, particularly in relation to effectiveness and justification.

We therefore raise an objection on soundness and seek modifications.

Our concern is not that waste facilities should never be safeguarded in Harrow. It is that a Plan extending to 2041 should demonstrate more clearly how environmental justice, cumulative impact, community accessibility, HGV impacts and the circumstances of communities surrounding safeguarded sites have influenced both its strategy and its implementation safeguards.

Question 6: Why do we consider aspects of the Plan unsound?

A sound plan must be more than technically comprehensive. It must provide a sufficiently clear and effective framework for decisions that will follow from it.

First, the Plan does not give sufficient prominence to environmental justice. The Integrated Impact Assessment is valuable, but equality and environmental disadvantage should be operational considerations within the planning policies themselves. A strategic plan should be

capable of asking not merely whether an individual waste development produces an acceptable impact in isolation, but whether its location or expansion adds materially to burdens already borne by disadvantaged communities.

Second, the treatment of transport impacts should be strengthened. Waste facilities can generate substantial HGV movements. A site may be operationally suitable while the routes serving it impose adverse consequences elsewhere. The Plan should therefore require assessment of realistic HGV numbers, routing, times of operation, road safety, air quality and noise, including cumulative impacts where other development is expected.

Third, greater attention should be given to sensitive receptors. Schools, nurseries, homes, care facilities, parks, walking and cycling routes and other community facilities should be explicitly considered when assessing new or intensified waste uses.

Fourth, the Plan needs a stronger approach to cumulative impact. Planning assessments too often examine individual proposals separately. The relevant question for a resident is the total environmental burden experienced where they live. Waste development should therefore be assessed alongside existing waste operations, background traffic, planned housing and commercial development, air-quality conditions and other significant sources of noise or emissions.

Fifth, the Plan's monitoring framework should address community outcomes as well as waste capacity. Monitoring tonnes of waste, available capacity and safeguarded land does not establish whether the strategy is working acceptably for communities. Indicators should also address transport movements, complaints, environmental incidents, air-quality effects where measurable, and the distribution of waste infrastructure in relation to deprivation.

Finally, the experience of the Regulation 18 consultation raises questions about effective engagement. A consultation across seven planning authorities that generated only 77 responses, with no Harrow-specific comments reported to Harrow's scrutiny committee, should trigger analysis of why participation was so limited. An effective Plan requires continuing community engagement, particularly around safeguarded sites.

Question 7: Modifications we consider necessary

HMG asks the authorities to modify the Plan so that environmental justice becomes an explicit consideration in waste-planning decisions. The Plan should require decision-makers to consider whether a proposal would create or intensify a disproportionate environmental burden on communities experiencing socioeconomic disadvantage or existing environmental stress.

Policy WLWP4, or equivalent supporting text, should expressly require transport assessments for new, expanded or materially intensified waste facilities to consider HGV numbers, routes, operating hours, road safety, congestion, noise, emissions and impacts on pedestrians and

cyclists. Assessment should extend beyond the application boundary to the routes realistically used by waste vehicles.

The Plan should expressly require cumulative impact assessment where waste development may interact with other significant existing or planned development or environmental pressures.

The supporting text should require particular consideration of sensitive receptors, including residential areas, schools and early-years provision, health and care facilities, parks and community facilities.

For safeguarded sites, including HA01 and HA02, the Plan should provide clearer site-specific information about environmental constraints, access routes and circumstances in which expansion or intensification might be acceptable. Safeguarding should not be interpreted as an assumption that intensification is acceptable irrespective of its local consequences.

The monitoring framework should be expanded to include indicators capable of identifying adverse community and environmental outcomes, including complaints and significant environmental or transport effects associated with waste facilities.

We also recommend a commitment that communities around safeguarded sites will be proactively engaged when material expansion or intensification is proposed, using accessible information rather than relying solely on conventional statutory notices.

These changes would make the Plan more effective because they would translate broad commitments to sustainable waste management and high-quality facilities into clearer requirements capable of being applied consistently in future planning decisions.

Question 8: Do we consider it necessary to participate in examination hearing sessions?

Yes.

HMG would wish to retain the opportunity to participate in relevant examination hearings, particularly if the Inspector considers matters relating to environmental justice, consultation effectiveness, safeguarded sites, transport and HGV impacts, cumulative environmental effects, equality, monitoring or the Harrow sites.

Question 9: Why do we consider participation in the hearing sessions necessary?

Our concerns extend beyond the wording of an individual policy. They concern the relationship between strategic waste planning, local environmental impacts, socioeconomic disadvantage and democratic accountability.

Harrow provides a useful case study because two sites are proposed for continued safeguarding while the borough contains pronounced differences in deprivation and environmental circumstances. We believe community evidence can assist the Inspector in testing whether the Plan's strategic approach translates into adequate safeguards at neighbourhood level.

Participation would also allow examination of whether the Plan has sufficiently considered the practical accessibility and effectiveness of community engagement. The extremely limited response at Regulation 18, including the reported absence of Harrow-specific representations, makes this a legitimate matter for examination rather than simply an administrative observation.

Governance after the consultation

Although this issue extends beyond the narrow wording of the WLWP, HMG considers the post-consultation decision-making process relevant to public confidence.

Harrow Full Council has already authorised officers to consider Regulation 19 representations, make modifications and proceed to submission unless officers determine that the consultation has produced significant changes to the overall approach. The resolution does not establish an objective public definition of “significant” for that purpose. HMG has previously contrasted this with Brent's decision to retain a final political checkpoint after consultation.

We therefore ask that, irrespective of the delegated authority already granted, Harrow Council publishes the Harrow-related Regulation 19 representations, explains what changes have been made or rejected and why, and places the final submission version before elected members in public.

Consultation should form part of a visible chain of democratic accountability: residents are informed, residents are able to participate, their representations are considered, the response to those representations is transparent, and elected representatives take responsibility for the resulting decision.

Conclusion

HMG supports the preparation of an up-to-date West London Waste Plan and recognises the environmental importance of reducing waste, increasing reuse and recycling, promoting the circular economy and ensuring sufficient waste-management capacity.

But sustainable waste planning is also about people and places.

Communities should not be expected to accept environmental burdens simply because a facility is strategically necessary. Where waste sites are safeguarded close to residential communities, particularly communities experiencing socioeconomic disadvantage or other environmental pressures, the planning framework should demonstrate that distributional impacts, HGV movements, air quality, noise, road safety, flood risk and cumulative effects have been properly considered.

The central test should therefore not simply be whether West London has enough waste-management capacity to 2041. It should also be whether that capacity is planned and managed in a way that is environmentally sustainable, socially equitable, locally accountable and capable of retaining public confidence.

For those reasons, HMG considers that the Proposed Submission WLWP should be modified before adoption to strengthen environmental justice, cumulative-impact assessment, transport safeguards, site-specific transparency, monitoring and community engagement.