

Council (Annual)

Tuesday 19 May 2015

CONFIRMATION OF CABINET AND COMMITTEE RECOMMENDATIONS AND RELEVANT ORIGINATING BACKGROUND PAPERS

ITEM ON SUMMONS	CABINET / COMMITTEE RECOMMENDATION	ORIGINATING REPORT
	Recommendation I : Cabinet (23 April 2015)	
12.	WEST LONDON WASTE PLAN ADOPTION	Report of Corporate Director of Environment and Enterprise (Pages 3 - 200)
	Recommendation I : Overview and Scrutiny Committee (14 April 2015)	
13.	SCRUTINY ANNUAL REPORT 2014/15	Report attached (Pages 201 - 226)

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REPORT FOR: **CABINET**

Date of Meeting:	23 April 2015
Subject:	West London Waste Plan Adoption
Key Decision:	Yes
Responsible Officer:	Caroline Bruce, Corporate Director of Environment and Enterprise
Portfolio Holder:	Councillor Keith Ferry, Deputy Leader and Portfolio Holder for Business, Planning and Regeneration
Exempt:	No
Decision subject to Call-in:	Yes, except to the recommendation to Council and where the recommendation is for noting only
Wards affected:	All
Enclosures:	Appendix 1 - West London Waste Plan Appendix 2 - Inspector's Report of the West London Waste Plan

Section 1 – Summary and Recommendations

This report documents the outcome of the Public Examination of the joint West London Waste Plan and requests that Cabinet Members recommend to full Council the adoption of the document as part of the local development plan framework for Harrow.

Recommendations:

Cabinet is requested to:

1. Note the outcome of the independent Examination in Public of the West London Waste Plan;
2. Recommend that the Council adopts the West London Waste Plan as part of the Borough's Local Plan;
3. Recommend that the Portfolio Holder for Business, Planning and Regeneration be notified as soon as practicable when the post-adoption statutory requirements for the West London Waste Plan have been complied with.

Reason: (For recommendation)

To progress the West London Waste Plan to adoption in accordance with the current Local Development Scheme, to ensure that an up-to-date Development Plan for the Borough is in place and to comply with regulatory requirements.

Section 2 – Report

Introduction

1. The purpose of the West London Waste Plan (WLWP) can be summarised as follows: to set out a planning strategy to 2031 for sustainable waste management; contribute to the delivery of national and regional targets for waste recycling, composting and recovery; and the provision of sufficient waste management capacity to manage waste arisings across the six west London boroughs. Planning applications for any new waste management facilities will be considered in the light of the WLWP policies, and they will also be assessed against the Borough's Local Plan and any other material considerations.

Preparation of the West London Waste Plan

1. Drafting of the WLWP has taken into account relevant planning legislation, national planning policy, on-going advice from the Greater London Authority (GLA) and the Planning Inspectorate, and also lessons learnt from professional planning bodies and agencies. Key public consultation stages have comprised the following:

- Issues and Options (February 2009)
- Proposed Sites and Policies (February 2011)
- Draft Pre-Submission Version of the WLWP (February 2014)

2. The Pre-Submission Version of the WLWP was reported to Cabinet at its meeting on 13 February 2014, where Cabinet approved its publication for a

six week period in order to receive representations on the Plan's soundness and legality and, subject to representations, Cabinet also approved submission to the Secretary of State for Public Examination. Cabinet noted changes made to the draft West London Waste Plan, following an officer's report on the draft in June 2012.

Public Examination

3. The representations received on the Pre-Submission Version of the WLWP, and the plan, were then submitted to the Secretary of State who appointed Planning Inspector Mr Andrew Freeman BSc (Hons) DipTP DipEM FRTPI FCIHT MIEEnvSc to examine the plan for its soundness and legality. The boroughs wrote to the Inspector on 1 September 2014 requesting that, as part of the Examination process, and pursuant to section 20(7C) of the Planning and Compulsory Purchase Act (2004) (as amended), the Inspector recommend modifications to be made to the WLWP to ensure it satisfied the requirements in subsection (5)(a) of the Act and is sound.

4. Between 7 October and 10 October 2014, the Inspector held public hearings on aspects of the WLWP as part of the plan's Public Examination. During the hearings the Inspector indicated that, in order for the Plan to be sound, the boroughs should modify the Plan in a number of areas. Proposed Main Modifications to the Plan were published for representations on their "soundness" and "legal compliance" during a six week consultation period running from 7 November to 19 December 2014.

5. On 16th March 2015, the Inspector issued his Report to the boroughs and, subject to the inclusion of the main modifications mentioned above, he has concluded that the Plan is legally compliant and sound. The Inspector's Report is attached as an enclosure to this report. The Inspector's Report includes an appendix which sets out the Main Modifications to the Plan and the Inspector's reasoning for these modifications is set out in his Report.

6. The boroughs have published the Inspector's Report in accordance with Regulation 25 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This means that the Report is available to view via the Council's website and in hard copy at the Borough's offices.

7. Members of the five other partner Boroughs, (Brent, Ealing, Hillingdon, Hounslow and Richmond upon Thames, as well as the Old Oak and Park Royal Development Corporation, will also consider whether to adopt the Plan at meetings between April and July 2015.

Options considered

8. This report recommends the adoption of the WLWP incorporating the modifications as agreed and as appended to the Inspector's Report. The modifications have been made in light of the discussion of the main issues between the Council's officers, other partner Borough Council officers and other participants at the public examination hearing sessions and the Inspector's comments throughout the process. They have been the subject of public consultation and, in making the modifications, the Planning Inspector has taken into account the responses received.

9. The only alternative to adoption that can be considered as an option is withdrawal of the WLWP. This would be at odds with the Council's adopted Local Development Scheme and, as related local waste policies were deleted by the Secretary of State on 28th September 2007 and upon the adoption of the Harrow Development Management Policies DPD on 4th July 2013, it would leave Harrow without a full suite of policies for determining planning applications for waste related development. Given the National Planning Policy Framework's (NPPF) presumption in favour of sustainable development that applies where boroughs do not have an up to date development plan, a decision not to adopt would leave the Council with little local policy control over the determination of applications for developments associated with the management of waste, relying solely on the Core Strategy and Development Management Policies Local Plan. It would also be a barrier to implementing the objectives of the Core Strategy and securing the infrastructure necessary to meet the demands of growth in the Borough. However, there are no grounds currently that would warrant Council's consideration of this option.

Purpose and Outcome of Examination in Public

10. Section 20 of the Planning and Compulsory Purchase Act 2004 requires every local development plan document to be submitted to the Secretary of State for independent examination. The purpose of the Examination is to determine that the plan has been prepared in accordance with legal requirements and that it is 'sound'.

11. Legal compliance means that the plan has been prepared:

- in accordance with the Council's Local Development Scheme and Statement of Community Involvement;
- has been the subject of sustainability appraisal;
- has regard to national policy;
- conforms generally to the regional spatial strategy; and
- has regard to the sustainable community strategy for the area.

12. The National Planning Policy Framework amplifies what is meant by 'sound' in relation to Local Plan Documents. To be sound, a DPD must be:

- justified (in relation to the evidence base and reasonable alternatives);
- effective (deliverable, flexible, and capable of being monitored);
- positively prepared (does not stifle development); and
- consistent with national policy.

13. As noted at paragraph 5 above, the Planning Inspector's Report confirms that the policies of the WLWP are legally compliant and 'sound'.

Main Issues and Inspector's Modifications

14. Following the Examination in Public hearing sessions, the Planning Inspector's Report into the WLWP addresses six key issues in order to make the Plan sound. These are:

- Whether the Plan sets out a positive and collective vision for the sustainable management of waste within the area
- Whether sufficient new waste management capacity of the right type would be provided in the right place and at the right time
- Whether there are clear and effective policies that will help secure the appropriate and timely provision of waste management facilities in line with the London Plan (2011) and national policy and guidance
- Whether the site selection process has led to the identification of sites that would meet appropriately the need for new waste management capacity in West London
- Whether the allocated sites are acceptable in environmental terms and in other respects; whether the locations are deliverable; and whether the Plan provides an appropriate context for the successful development of waste management facilities
- Whether there are clear arrangements for monitoring the Plan and reporting the results as part of a delivery strategy with clear targets and measurable outcomes

15. Consideration of these issues led to the modifications to the Plan. The Inspector summarises the principal main modifications in his report as follows:

- adding reference to superseded policies;
- recognising updated national policy (National Planning Policy for Waste);
- aligning the Vision and Strategic Objectives with national policy;
- encouraging appropriate provision for construction, demolition and excavation waste and hazardous waste;
- adding a policy on the provision of new waste management capacity;
- ensuring the effectiveness of policies on safeguarding, the location of development, high quality development, decentralised energy and sustainable site waste management;
- correcting details regarding allocated sites (including Forward Drive Council Depot);
- adding site descriptions and relevant considerations; and
- introducing monitoring triggers.

16. One of these modifications concerned a change to the boundary of the Forward Drive site allocation in Harrow. This modification was put forward to ensure that the boundary of the allocation in the Waste Plan reflected that in Site Allocation AAP21 of the adopted Harrow Area Action Plan.

17. It should be noted that some additional, or minor, modifications to the plan have also been made. These are minor changes to the plan that have been made to provide clarity, improve grammar, spelling corrections and factual changes where needed.

Sustainability Appraisal and Habitats Assessment

18. Section 19 of the Planning and Compulsory Purchase Act (2004) and the Environmental Assessment of Plans and Programmes Regulations (2004) require local planning authorities to carry out sustainability appraisal of Local Plan documents and to prepare a report of the findings of the appraisal. The Regulations prescribe the requirements for Environmental Assessment pursuant to relevant European Union directives. However as a matter of national policy, the UK Government requires sustainability appraisal to also assess economic and social effects, as well as those in relation to the environment.

19. At all stages of preparation of the WLWP the partner boroughs have undertaken sustainability appraisal of the document, in accordance with requirements and proportionate to the level of detail contained within the documents at the stage reached. This includes the public consultations on modifications made throughout the Public Examination process, as described above. The Sustainability Appraisal Report has been made available alongside the WLWP at each stage of public consultation including on the Main Modifications. The final Sustainability Appraisal Report will be permanently available for inspection alongside the WLWP.

20. The Conservation of Habitats and Species Regulations 2010 (the Habitats Regulations) requires local planning authorities to make an 'appropriate assessment' of the implications for designated 'European' sites of a plan that they intend to bring into effect. The Habitats Regulations prescribe the requirements for Habitats Assessment pursuant to relevant European Union directives.

21. The partner boroughs undertook an assessment in accordance with the Habitats Regulations, and in consultation with Natural England, of the impact of the WLWP on all European sites within 10 kilometres of the Plan area. The assessment was first carried out in December 2010 and an update was completed in 2014. As with the Sustainability Appraisal, the Habitats Assessment has also been made available alongside the WLWP for public consultation. The final Assessment will be permanently available for inspection on the Council's website.

Procedure upon Adoption

22. Section 23 of the Planning and Compulsory Purchase Act (2004) gives power to a local authority to adopt a local development plan document following compliance with any modifications recommended by the Inspector who carried out the independent examination of the document. Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended requires the local planning authority to fulfil the following obligations as soon as reasonably practicable after the adoption of a local development plan document. They are to:

- make available for inspection, at the same locations as the pre-submission document, the adopted document, an adoption statement and the sustainability appraisal report;

- publish the adoption statement on the authority's website;
- advertise the availability of the adoption statement and the adopted local development plan document;
- send the adoption statement to any person who has requested to be notified of the adoption of the local development plan document; and
- send the local development plan and the adoption statement to the Secretary of State.

23. Following decisions by this Council, all the partner Boroughs, and the Old Oak and Park Royal Development Corporation, to adopt the WLWP an adoption statement will prepared and officers will ensure compliance with the post adoption requirements. Officers will notify the Portfolio Holder for Planning and Regeneration once all of the post adoption requirements of the local planning authority have been discharged.

24. Prior to final publication, the WLWP may be subject to desktop publishing to improve its legibility. Any such re-design will not change the content, but would be focused on improving the "look and feel" of the Plan to future users.

Legal Comments

25. In the event that the Council adopts the WLWP it will form part of the development plan for the Borough. In determining planning applications, the decision must be made in accordance with the policies set out in the WLWP (where applicable) as well as the Borough's adopted Local Plans and Core Strategy unless material considerations indicate otherwise.

26. Following adoption of the WLWP, any person aggrieved by the adoption of the documents may challenge the validity of the documents by making an application to the High Court under Section 113 of the Planning and Compulsory Purchase Act (2004). Any such application must be made within six weeks of the date of adoption of the WLWP.

Equalities Impact

27. An equalities impact assessment has been undertaken for the WLWP. This confirms that the policies of the WLWP will have a positive impact on target groups. The EqIA is available to view on the West London Waste Plan website which can be accessed via the Local Plan pages of the Council's website. This assessment was circulated to the E&E Directorate Equalities Group for review and sign-off as stated in the Cabinet report regarding the Pre-Submission Plan dated 13 February 2014.

Financial Implications

28. The cost of complying with the post adoption requirements and publishing the adopted Local Plans is contained within the existing planning budget.

Performance Issues

29. The WLWP will deal with municipal waste and commercial & industrial waste in accordance with the London Plan. It includes a chapter on monitoring and implementation. This sets out indicators, with triggers, that will be measured to monitor the implementation of the Plan. Monitoring of the Plan against these indicators will be reported in the Authorities Monitoring Report (AMR).

30. It will help WLWA and the six councils reduce the amount of waste sent to landfill and improve the amount of waste reused, recycled and composted by ensuring provision is made for a range of new waste management facilities that are required to treat waste generated within west London higher up the waste hierarchy (reduce-reuse-recycle-recovery and as a final option, landfill)

31. Since 2007/08 the amount of municipal waste generated in Harrow has decreased year upon year from 113,669 tonnes to 93,327 tonnes in 2013/14. This is well below the London Plan projection of 129,000 tonnes per annum. Harrow has increased the amount it recycles and composts significantly in recent years, achieving 49.2% in 2013/14, which is above the 40% target set for recycling and composting in the West London Municipal Waste Strategy but on track to meet the Local Plan target of 50% by 2020. The remaining waste continues to go to landfill sites outside the borough.

32. As set out in the latest Annual Monitoring Report, there have been no new waste management facilities provided in the Borough since monitoring commenced in 2004. Unfortunately, this seems to be a common theme across most west London boroughs. Without the WLWP, and allocating sites for waste management provision, it is difficult to see how Harrow and the other five boroughs will be able to substantially improve their performance against any of the above targets.

Environmental Impact

Does the proposal comply with all relevant environmental legislation? Yes

33. The WLWP has been the subject of a comprehensive Sustainability Appraisal, incorporating the requirements of Strategic Environmental Assessment, in compliance with the regulatory requirements for preparing development plan documents as set out at paragraphs 18 – 21 above.

Risk Management Implications

Risk included on Directorate risk register? Yes

Separate risk register in place? Yes

Potential Risks	Commentary	Mitigation Measures
Compliance with legislation	To meet the test of 'soundness' of Local Plans are required to comply with the legal requirements for preparing and consulting on Local Plans under the Planning and Compulsory Purchase Act.	Officers ensured compliance with the relevant legislative requirements, including the undertaking of Sustainability Appraisal, Equalities Impact Assessment and requirements for consultation. A log was maintained that chronicles legal compliance as the WLWP progresses towards adoption.
Robust evidence	In preparing the WLWP, the boroughs have sought to apply a robust methodology to the assessment of existing and potential waste sites. However, there is a degree of professional judgment required, both in the assessment and in the interpretation of the outcomes that may give rise to potential 'soundness' concerns. In addition, the assessments represent a snapshot in time, and therefore the conclusions drawn now may not stand for the full life of the Plan.	The WLWP includes monitoring requirements that would necessarily trigger an analysis and potential review of the Plan should the monitoring indicate an undersupply of sites or capacity.
Politically sensitivity	Waste management is typically a sensitive topic, given its has a high profile with residents as being a key function of Council's, and one that can result in adverse environmental and amenity issues. Waste management facilities are perceived by most to be a 'bad neighbour' and therefore proposals, or even the allocation of sites for waste management, can draw significant resistance.	Officers have worked with Members to educate residents and other key stakeholders about the need for the Council to take a pro-active and positive approach to the management of Harrow's waste arisings. In particular, the implications of the EU Landfill Directive which requires waste to be diverted from landfill. Failure to do so will result in significant financial penalties for the Council. There is also a social and environmental requirement that waste be managed in the area in which it is generated (ie self-sufficiency), which is driving the change in London that we treat London's waste in London rather than transfer it out of London for disposal.

34. The WLWP is being prepared jointly. A memorandum of understanding was signed by six West London boroughs, which details the working arrangements. Adoption of the Plan will satisfy the MOU undertakings.

Section 3 - Statutory Officer Clearance

Name: Jessie Man	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 24 March 2015		
Name: Katherine Hamilton	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 30 March 2015		

Ward Councillors notified:	NO, as it impacts on all Wards
EqIA carried out:	No
EqIA cleared by:	EQIA was carried out prior to the Plans Submission – see paragraph 27

Section 6 - Contact Details and Background Papers

Contact: Philip Crowther, Planning Officer, Tel: 020 8736 6188

Background Papers:

Planning Inspector's Report into the West London Waste Plan, 16 March 2015

West London Waste Plan

WLWP Sustainability Appraisal, Habitats Regulations Assessment, Equalities Impact Assessment and Evidence Base Studies

NB: All of the above background papers are available via the west London waste plan website www.wlwp.net

Call-In Waived by the Chairman of Overview and Scrutiny Committee	NOT APPLICABLE <i>[Call-in applies except to the recommendation to Council and where the recommendation is for noting only]</i>
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Version for Adoption

March 2015

West London Waste Plan

A Joint Waste Plan for the London Boroughs of Brent,
Ealing, Harrow, Hillingdon, Hounslow and Richmond upon
Thames

Version for Adoption

March 2015

This is a version of the Plan to be considered for adoption.

Executive Summary

1. For some time, both the European and UK Governments have been concerned that we are sending too much of our waste for disposal – not enough is being recycled and re-used.
2. Consequently, every local authority must produce a plan detailing how it will deal with waste generated in its area over the next 15 years. These plans make up a part of the authority's Local Plan and show which factors they will take into account when deciding on whether to grant planning permissions for new waste management facilities or extensions and substantive changes to existing ones.
3. In West London, six London Boroughs agreed to co-operate to produce a single waste plan for their combined area. When adopted, this plan will form part of each of their respective Local Plans.
4. Preparation of the West London Waste Plan involved a number of stages and these have included evidence gathering, technical assessment and public consultation. This version of the Plan includes modifications made to the Proposed Submission Plan that underwent independent examination between July 2014 and March 2015 and was found sound by an independent planning Inspector in March 2015.
5. In London, the Mayor set out in the London Plan (adopted in 2011) projections of how much municipal waste and commercial and industrial waste is likely to be generated in the capital over the next 20 years. Each borough was allocated an amount of London's waste that it is required to positively plan for and manage. This includes ensuring that sufficient capacity is identified to meet the apportioned targets in the London Plan (2011). By each borough meeting its apportionment, London will dramatically reduce its reliance on landfill and move towards being net self-sufficient¹ overall.
6. The West London Waste Plan:
 - details the estimated amounts for the different types of waste that will be produced in West London up to 2031;
 - identifies and protects the current sites to help deal with that waste;
 - identifies the shortfall of capacity needed over the life of the Plan (to 2031); and

¹'Net self-sufficient' means that the equivalent of 100 per cent of London's waste will be managed within London.

- proposes a set of sites to meet the shortfall which are *preferred for waste related development*.
7. This Plan has been prepared with the objective of ensuring consistency with national Government policy and general conformity with the London Plan (2011).
 8. All policies of this Plan will be taken into account when decisions are made on planning applications for waste development along with any relevant policies in the development plan.
 9. The Plan comprises seven sections, covering:
 - i. An introduction to the West London Waste Plan;
 - ii. The Vision and Objectives of the Plan;
 - iii. How waste is managed at present;
 - iv. An explanation of what will be needed in the future to manage waste;
 - v. Details of the sites identified for future waste facilities;
 - vi. Policies to guide the determination of planning applications for new waste facilities; and
 - vii. An explanation of how the Plan will be monitored in future.
 10. The existing sites and additional sites proposed for inclusion in the Plan are set out in the tables below:

Table i: Existing waste sites proposed for allocation

Site Number	Name	Site Area (ha)	Borough
352	Twyford Waste Transfer Station	1.24	Brent
1261	Veolia Transfer Station, Marsh Road	2.71	Brent
309*	Greenford Reuse & Recycling Site	1.78	Ealing
310*	Greenford Depot, Greenford Road		
328#	Quattro, Victoria Road, Park Royal	0.7	Ealing
222	Council Depot, Forward Drive	2.31	Harrow

Site Number	Name	Site Area (ha)	Borough
331	Rigby Lane Waste Transfer Station	0.91	Hillingdon
342	Twickenham Depot	2.67	Richmond
Total		12.32	

**These two sites are contiguous and part of a larger site: for the purposes of the Plan, they are considered as a single, consolidated site*

This site is subject to a High Speed 2 (HS2) Safeguarding Direction and will not be available from 2017 until 2024

Table ii: Additional sites-allocated in the Plan for waste management uses

Site Number	Name	Site Area (ha)	Borough
2861	Western International Market	3.20	Hounslow
Total		3.20	

Combined Total Area = 15.52 hectares

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Maps of Allocated Sites

Site 352	Twyford Waste Transfer Station, Abbey Road, Brent.....	35
Site 1261	Veolia Transfer Station, Marsh Road, Alperton, Brent.....	35
Site 309	Greenford Reuse and Recycling Site & Site 310 Greenford Depot, Greenford Road, Greenford, Ealing.....	36
Site 328	Quattro, Victoria Road, Park Royal, Ealing.....	36
Site 331	Rigby Lane Waste Transfer Station, Hayes, Hillingdon.....	37
Site 342	Twickenham Depot, Langhorn Drive, Twickenham, Richmond.....	37
Site 222	Council Depot, Forward Drive, Harrow.....	38
Site 2861	Western International Market, Hayes Road, Southall, Hounslow.....	39

1 The West London Waste Plan

1.1 Preparation of the Plan

1.1.1 The West London Waste Plan has been prepared jointly by the six West London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames. The area covered by the plan, and how it is split into its constituent boroughs is shown in Figure 1-1. How the West London Waste Plan area sites within its wider regional context is illustrated at Figure 1-2.

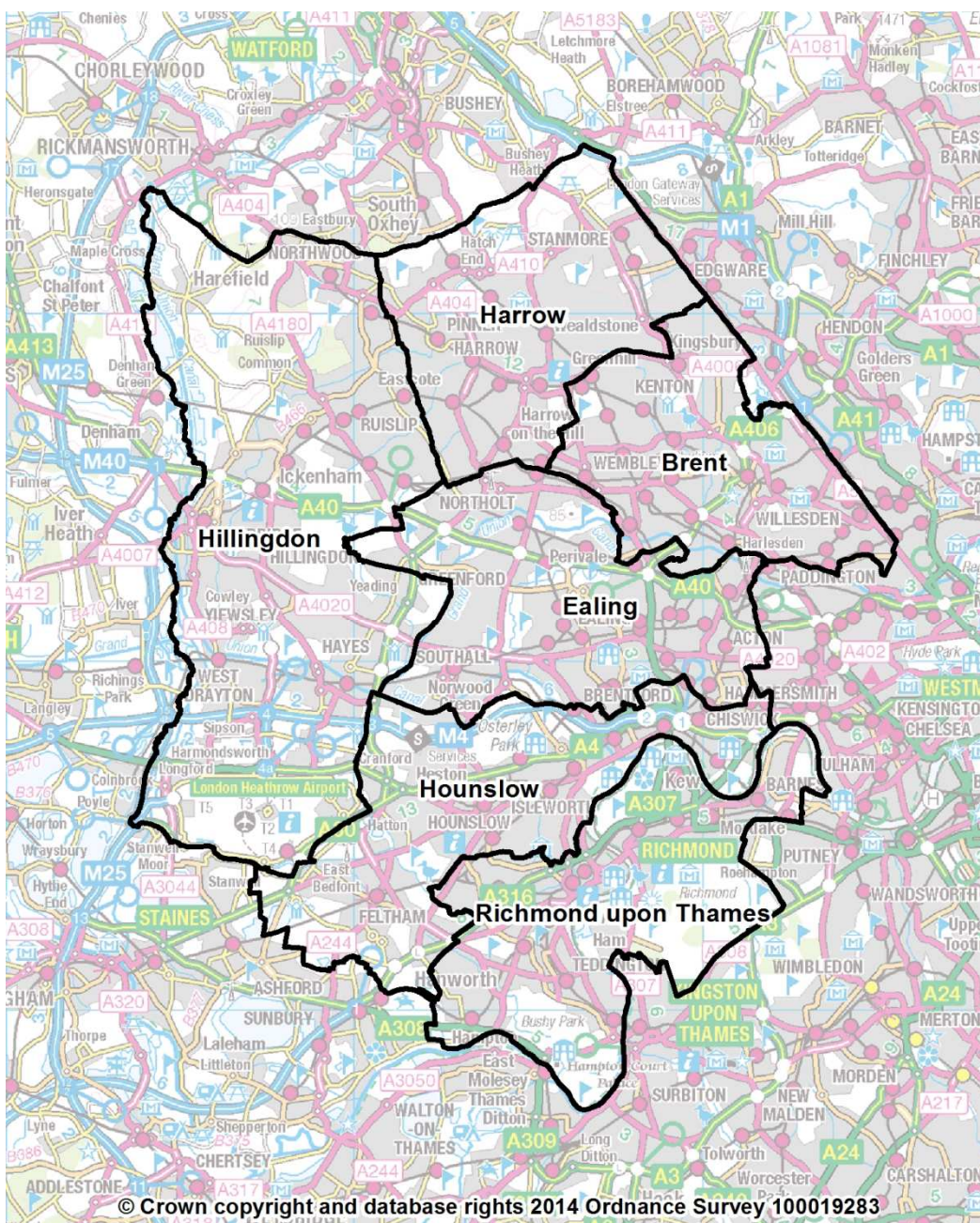


Figure 1-1: The West London Waste Plan Area

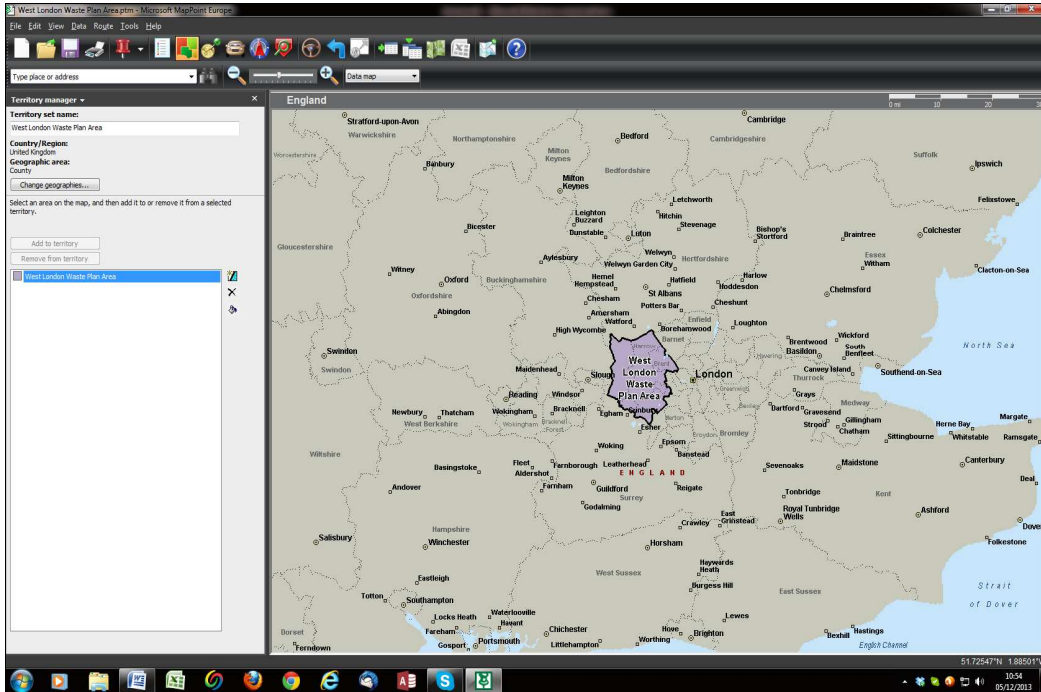


Figure 1-2: The West London Waste Plan Area context

1.2 Why Is The West London Waste Plan Needed?

1.2.1 The West London Waste Plan (the Plan) provides a planning framework for the management of all waste produced in the six Boroughs over the period to 2031. The Boroughs are required by Government to prepare local planning policy for waste management which needs to be in general conformity with the Mayor’s London Plan. The London Plan is the Mayor of London’s planning strategy for the capital that sets out targets for recycling and composting for waste from households, businesses and industry (See Table 1-1 below). At the time of preparation of this Plan the London Plan (2011)² was in force. The London Plan has been updated by the ‘Further Alterations to the London Plan’ (FALP) which were adopted by the Mayor in March 2015. This Plan reflects the targets and waste apportionments specified in the 2011 version. The Boroughs have committed to reviewing this Plan in light of FALP adoption.

Table 1-1: Recycling /composting/reuse targets set in the London Plan (2011)

Waste stream	2015	2020	2031
Municipal Solid Waste	45%	50%	60%
Commercial & Industrial Waste	-	>70%	-
Construction, Demolition & Excavation	-	>95%	-
Diversion of biodegradable/recyclable wastes from landfill	-	-	100%

Source: London Plan (2011)

²See <http://www.london.gov.uk/priorities/planning/london-plan>

- 1.2.2 A significant amount of waste is transferred outside of London for treatment or disposal. The London Plan (2011) aims to ensure that as much of London's waste is managed within London as practicable working towards managing the equivalent of 100% of London's waste within London by 2031.
- 1.2.3 The West London Waste Plan will form part of the Development Plan for each of the Boroughs and the Old Oak Common and Park Royal Development Corporation (which covers part of Brent and Ealing). This Plan supersedes certain policies in other Borough Development Plan Documents as set out in Appendix 7. The Development Plan comprises a number of development planning documents containing both specific policies for waste and sites identified for waste management. These planning documents must be in general conformity with the London Plan and pay regard to national policies and advice. Before the Plan can be adopted the independent Inspector has to find that it has been prepared in accordance with the Duty to Co-operate; that it satisfies legal and procedural requirements; and that it is sound.
- 1.2.4 This Plan identifies the sites proposed for waste management development in the plan area and provides policies with which planning applications for waste developments must conform. This Plan reflects the London Plan (2011) apportionment targets providing management of waste from households, business and industry in the Plan area up to 2031. The timetable for the production of the Plan and for its final adoption is shown in Table 1-2.

Table 1-2: Timetable for the development of the West London Waste Plan

Period	Stage of development
January - March 2009	Issues and Options Consultation
February - March 2011	Proposed Sites and Policies Consultation
March - April 2014	Proposed Submission Consultation
July 2014	Submission to the Secretary of State c/o Planning Inspectorate
Autumn 2014	Public Examination
Summer 2015	Adoption by the West London Boroughs

1.3 Relationship with Other Planning Strategies and the Plan's Status

1.3.1 The Plan is influenced by, and has to give consideration to, relevant European, national, regional and local policy in relation to waste development (both adopted and emerging). The Plan supports the implementation of the Boroughs' Sustainable Community Strategies in several ways which follow the three pillars of sustainable development, which underpin the Sustainable Community Strategies, as follows:

- Social: The Plan ensures that waste is managed in a way that protects communities and their health;

– Environmental: The Plan ensures that waste will be managed in a manner that does not harm the environment

– Economic: The Plan seeks to provide sufficient opportunities for the management of waste that is an essential part of a high performing economy.

- 1.3.2 Once this Plan is adopted by each of the constituent boroughs it will take on the status of a statutory Local Development Document, and form part of the Development Plan. Determination of planning applications shall be made in accordance with the Development Plan unless material considerations indicate otherwise.

European Legislation

- 1.3.3 The revised Waste Framework Directive [2008/98/EC]³, which has been implemented by the Waste (England and Wales) (Amended) Regulations 2012⁴, is the over-arching European Union (EU) legislation for waste. The directive requires Member States to take appropriate measures to encourage firstly, the prevention or reduction of waste and its harmfulness and secondly, the recovery of value from waste by means of recycling, re-use or reclamation or any other process with a view to extracting secondary raw materials, or the use of waste as a source of energy. This management scheme is called the waste hierarchy (see Figure 1-3), and the objective is to manage waste as near to the top of the hierarchy as possible with safe disposal of waste as a last resort. Article 28 of the Directive also requires Member States to prepare one or more waste management plans that cover its entire geographical area. Insofar as waste local plans are concerned, the key provisions relate to the waste hierarchy; protection of human health and the environment; the principles of proximity and self-sufficiency; the establishment of waste management plans; and periodic inspections.

³ *Waste Framework Directive (Directive 2008/98/EC)*: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:312:0003:0030:en:PDF>

⁴ See: <http://www.legislation.gov.uk/ukxi/2012/1889/made>

1.3.4 The West London Waste Plan provides for the management of waste according to the waste hierarchy (Figure 1-3 below).

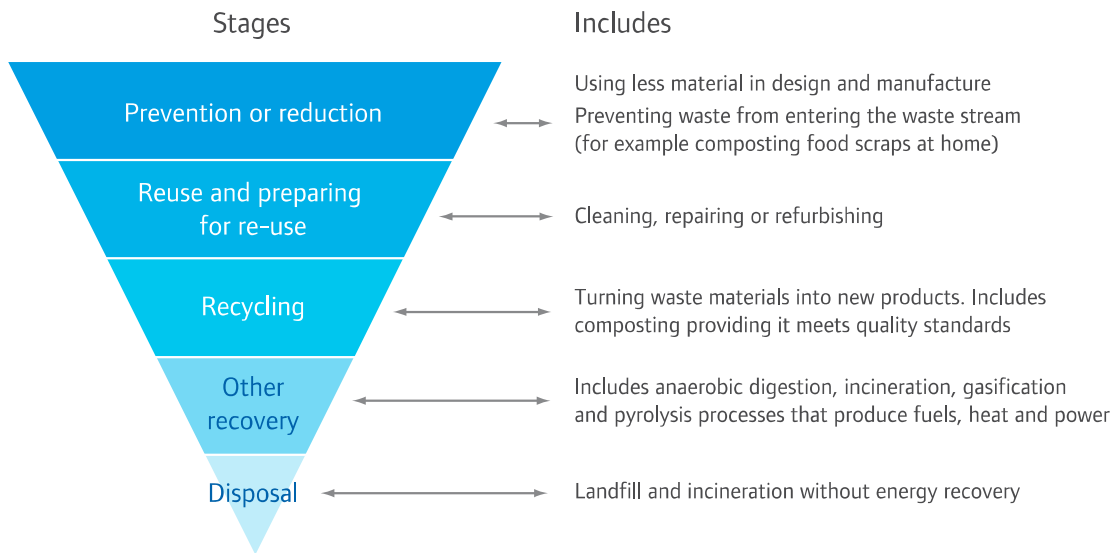


Figure 1-3 The Waste Hierarchy

National Policy

1.3.5 The planning system, as well as the waste management industry has undergone significant changes over the past few years. The National Planning Policy Framework (March 2012) sets out the national policy approach to ensuring sustainable development but does not include policy concerned specifically with the management of waste.

National Planning Policy for Waste

1.3.6 National Planning Policy for Waste⁵ sets out national objectives and guidance to be considered when producing planning policies for waste development and consideration of applications for waste development and for development that have waste management implications.

Waste Management Plan for England

1.3.7 To meet the requirement of the Waste Framework Directive for a national waste plan, in December 2013, the Government published an updated waste strategy for England

⁵ National Planning Policy for Waste, October 2014 <https://www.gov.uk/government/publications/national-planning-policy-for-waste>

in the form of a National Waste Management Plan (known as the 'Waste Management Plan for England' December 2013) along with a separate National Waste Prevention Plan. Production of local waste plans is also intended to contribute towards meeting this requirement.

- 1.3.8 Publication of the Waste Management Plan for England followed 'The Government Review of Waste Management Policy in England 2011'⁶, which was published following a comprehensive review of The Waste Strategy for England 2007. The Waste Management Plan for England provides an overview of waste management in England and fulfils Article 28 of the Waste Framework Directive mandatory requirements, and other required content as set out in Schedule 1 to the Waste (England and Wales) Regulations 2011.

Localism Act 2011 and the Duty to Co-operate

- 1.3.9 The Localism Act 2011 provides for the abolition of all Regional Spatial Strategies (RSSs), except the London Plan (2011) which is retained in the capital. The RSSs apportioned quantities of waste to be managed in each sub-regional area which generally corresponded to a Waste Planning Authority (WPA) area. WPAs outside London are no longer required to be in conformity with the now abolished RSSs or meet waste management apportionments for London. In the South East and East of England, this included provision for landfill of some residual waste from London. This means that some counties that previously considered West London's residual waste management needs when planning landfill capacity may no longer be doing so. Clearly this has a significant implication for the management of waste from London boroughs where waste is exported to be managed outside the London area. The London Plan (2011) expects London boroughs to plan for 100% net self-sufficiency in waste management by 2031, whilst recognising that there is likely to be ongoing management of waste arising in London outside of the capital, albeit in decreasing amounts.
- 1.3.10 The Localism Act 2011 introduced the 'Duty to Co-operate' requiring local planning authorities (and other public bodies) to co-operate in relation to the planning of sustainable development. All public bodies have a duty to co-operate on planning for strategic matters that have cross administrative boundary impacts. The NPPF notes the need for co-operation on strategic priorities⁷, such as the provision of infrastructure for waste management and wastewater. In carrying out their duty, the Act expects bodies to "engage constructively, actively and on an ongoing basis". In the case of West London the particular cross boundary movements of waste considered are as

⁶ *Government Review of Waste Management for England 2011* -<http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf>

⁷ *National Planning Policy Framework 2012, paragraph 156*

follows:

- Management of residual waste
- Management of hazardous waste

- 1.3.11 The extent of these movements is detailed in Section 3. In considering this, the West London boroughs have engaged formally with the Environment Agency as well as relevant WPAs. Contact was made with all WPAs currently accepting waste from the Plan area. Emails, meetings and telephone conversations were used to exchange and confirm information on waste flows between areas and to agree significant cross boundary issues regarding the waste flows, future requirements and other, related matters. Attendance at meetings of regional groupings of Waste Planning Authorities such as the London Regional Technical Advisory Board (RTAB) and the South East Waste Planning Advisory Group (SEWPAG) provided further opportunities to discuss cross boundary issues.
- 1.3.12 Published and emerging waste planning documents of the counties concerned were also consulted to assess current and projected capacities and policies regarding accepting waste from West London in the future.
- 1.3.13 Throughout the Plan process there has been ongoing engagement with other WPAs.
- 1.3.14 Details of how the West London Boroughs engaged with bodies to meet the Duty to Co-operate requirements are contained in a separate Duty to Co-operate Schedule.

Regional Policy

- 1.3.15 The London Plan provides the regional planning framework for the six West London Boroughs jointly preparing the Plan and outlines the principal guidelines for waste development. The Government has agreed that, although Regional Spatial Strategies (RSS) for other parts of England have been revoked, the London Plan will continue to provide strategic guidance for the capital, as part of the Development Plan.
- 1.3.16 This Plan is in general conformity with the policies in the London Plan and in particular those regarding waste management. As mentioned above, this includes an apportionment of the tonnages of municipal and commercial and industrial waste to be managed by each London borough; revised targets for recycling of municipal waste; and new targets for recycling of commercial and industrial waste and recycling or reuse of construction and demolition waste and diversion of waste from landfill (see Table 1-1).
- 1.3.17 Implementation of the policies in this Plan will ensure that the Boroughs contribute towards the London Plan aim of net self-sufficiency by 2031.
- 1.3.18 In March 2015 the Mayor adopted Further Alterations to the London Plan (FALP). These include amendments to the forecast quantities of commercial and industrial waste arising within London, based on baseline data adjusted down to reflect the

findings of the national C&I waste survey of 2010. As a consequence the revised projected overall capacity shortfall identified has fallen and hence the revised Borough apportionment targets have reduced. The need for changes to this Plan in light of the FALP will be considered in due course.

Local Policy

- 1.3.19 Each borough must produce a Local Plan which replaces what was previously called the Local Development Framework or Unitary Development Plan. The Local Plan includes policies, strategies and plans, such as this Plan, and may comprise more than a single document.
- 1.3.20 This Plan has been prepared jointly by the six West London Boroughs, and is aligned with their individual Local Plans and helps deliver their Sustainable Community Strategy.

1.4 Sustainability Appraisal and Other Assessments

- 1.4.1 The Plan has been subjected to a Sustainability Appraisal (SA) during the course of its development. An SA appraises whether planning documents accord with the principles outlined in the Government's UK Sustainable Development agenda⁸, and implements the EU Strategic Environmental Assessment Directive. The SA aims to ensure that sustainability considerations are taken into account early in the process of policy development.
- 1.4.2 A Habitats Regulations Assessment (HRA); an Equalities Impact Assessment (EqIA) and a Strategic Flood Risk Assessment (SFRA) have also been undertaken as part of the development of this Plan. Appendix 2 provides details on the processes followed for each of these assessments.

1.5 Community and Stakeholder Consultation

- 1.5.1 The West London Waste Plan has been informed by consultation with statutory bodies, local organisations, key stakeholders and the wider community throughout its preparation. This has been carried out in accordance with each borough's "Statement of Community Involvement". Initial consultation took place in January and February 2009 on the key issues which the West London Waste Plan needs to address, as set out in the West London Waste Plan Issues and Options report⁹. A wide range of responses was received at various public workshops and meetings held across the six Boroughs, and by written representations.

⁸ See DEFRA: <http://sd.defra.gov.uk/what/>

⁹ West London Waste Plan Issues and Options Report (February 2009) available to download from <http://www.wlwp.net/documents.html>

1.5.2 The Boroughs' preferred approach to deal with the issues raised, as well as a list of the proposed sites, was published for comment in February 2011 in the Proposed Sites and Policies report¹⁰. Staffed drop-in sessions in each of the six Boroughs were attended by over 120 people, with 64 people attending further meetings. In addition to responses received at these events, 248 questionnaires were completed, and a further 133 additional written and email submissions were made. Two petitions containing 2,399 signatures were also submitted. A summary report on this consultation is available on the West London Waste Plan website (www.wlwp.net).

1.6 Proposed Submission WLWP

1.6.1 Representations were received on the Proposed Submission draft of the West London Waste Plan, including the Sustainability Appraisal and Equalities Impact Assessment during a six week period between 28 February and 11 April 2014.

1.6.2 All representations (which were not withdrawn) were submitted for consideration by a Planning Inspector at a formal examination. The purpose of the examination was to consider whether the Waste Plan complies with the legal and procedural requirements and is 'sound'.

1.6.3 Since the Planning Inspector's purpose is to answer these questions, the representations relate to legal compliance and "soundness", as set out in the National Planning Policy Framework, 2012 (NPPF). This includes being prepared in accordance with the Duty to Co-operate.

1.6.4 In summary, for this Plan to have been found 'sound' it passed the following tests:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan is the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan is deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan enables the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

1.6.5 More guidance on the meaning of these terms is available from the Planning Inspectorate¹¹ and in the National Planning Policy Framework, 2012¹², which outlines

¹⁰ *Proposed Sites and Policies Report (February 2011) available to download from <http://www.wlwp.net/documents.html>*

¹¹ *See: http://www.planningportal.gov.uk/uploads/pins/dpd_brief_guide_examining.pdf*

the requirements for Local Plans and the National Planning Policy for Waste which provides specific guidance for planning for sustainable waste management.

Public Examination

1.6.6 Following submission, the Secretary of State appointed a Planning Inspector to hold an independent examination of the Plan. This examination included public hearings which took place between 7 and 10 October 2014.

1.6.7 Further information can be obtained via the website:

www.wlwp.net

1.6.8 The West London Waste Plan document and an accompanying, Sustainability Appraisal and Equalities Impact Assessment are available for download via the West London Waste Plan website at: www.wlwp.net. Hard copies are also available to view at:

1. All Libraries across the six Boroughs; and
2. Local Council Offices across the six Boroughs.

1.6.9 All other submission documents, including the evidence base, are available for download. The West London Boroughs will seek to ensure that all reports are accessible to everyone and will offer assistance to those who are blind or partially sighted or do not speak English fluently.

1.7 Planning applications for waste management facilities

1.7.1 Once adopted, the West London Waste Plan will be the primary policy framework against which planning applications for waste management facilities in the West London Boroughs will be assessed. In the first instance developers should use the plan to guide them in identifying suitable sites to accommodate new waste management facilities. These site allocations are also supplemented by development management policies which provide a framework to assess the acceptability of individual proposals. Developers should also consider requirements and policies within the following documents before submitting a planning application for a waste management facility in West London:

- National policy and guidance, including that relating to waste management;
- Borough Local Development Documents;
- London Plan;

¹² See: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

- Mayor of London Order (2008); and
- Supplementary Planning Guidance from the Mayor or relevant Supplementary Planning Documents from the Boroughs.

1.7.2 Certain types of waste development need to be referred to the Mayor. Under the Mayor of London Order (2008) the Mayor has powers to take a decision on the following types of waste development applications as follows:

- Waste development to provide an installation with capacity for a throughput of more than 5,000 tonnes per annum of hazardous waste, 50,000 tonnes per annum of waste or occupying more than one hectare.
- Waste development that does not accord with one or more provisions of the Local Plan (including this Plan once adopted) and either occupies more than 0.5 hectares or has capacity for more than 20,000 tonnes per annum of waste or 2,000 tonnes per annum of hazardous waste.

1.8 West London Waste Authority

1.8.1 The West London Waste Authority (WLWA) is the statutory Waste Disposal Authority for the six West London Boroughs and as such is solely responsible for the transport, treatment and disposal of municipal solid waste (MSW) collected by the Boroughs. The WLWA is not responsible for Commercial and Industrial Waste (C & I), Construction, Demolition and Excavation Waste (CD & E) or forms of non-municipal hazardous waste.

1.8.2 The WLWA and its constituent Boroughs consulted on and subsequently adopted a Joint Municipal Waste Management Strategy¹³ in 2005. The strategy sets out the future waste and recycling plans and targets for the Authority and each of the six Boroughs to 2020. This was updated in 2009.

¹³ See: WLWA Draft Joint Municipal Waste Management Strategy, September 2005 - <http://westlondonwaste.gov.uk/about-us/waste-strategy/>

2 Vision and Objectives of the Plan

2.1 Vision

2.1.1 The unique characteristics of West London, as well as the key challenges and opportunities that have been identified in developing the Plan, have fed into the vision of the Plan, which is supported by its aims and objectives.

2.1.2 The vision of the Plan sets out how the Boroughs wish to see waste managed in West London by 2031. Its formulation has been informed by national, regional and local guidance along with the views of key stakeholders and the evidence base that underlies the Plan.

West London Waste Plan Vision

Over the period to 2031, the West London Waste Plan area will have made provision for enough waste management facilities of the right type and in the right locations to provide for the sustainable management of waste guided by the waste hierarchy to achieve net self-sufficiency and meet the needs of local communities. It will seek to do so, in a progressive manner, whilst protecting the environment, stimulating the economy and balancing the needs of West London's communities.

2.2 Strategic Objectives

2.2.1 The West London Waste Plan strategic objectives underpin the achievement of the vision and were developed in response to the key issues for West London and responses received through community consultation.

West London Waste Plan Strategic Objectives

1. To identify sufficient land for the management of the six Boroughs' pooled waste apportionment as set out in the London Plan (2011), including safeguarding existing waste sites and maximising their use as waste management sites and to provide for the sustainable management of an amount of waste equivalent to the amount arising within the Plan Area.
2. To ensure that waste is managed as far up the waste hierarchy as possible, by encouraging the minimisation of waste and the use of waste as a resource.
3. To reduce the impact of waste management on climate change by encouraging the use of sustainable transport and new, clean technologies, whilst seeking to locate waste management facilities as close to waste sources as practicable.
4. To ensure that, through appropriate policies, waste facilities meet the highest standards possible of design, construction and operation to minimise adverse effects on local communities and the environment.

5. To support the key aims and objectives of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond's Sustainable Community Strategies.

3 Existing Waste Management

3.1 Existing Waste Management

3.1.1 West London produces, and is expected to continue to produce, a significant quantity of waste. This section looks at the different types of waste being generated in West London and how it is currently being managed, along with future trends allowing for the West London Boroughs to determine what policies and sites are needed that will facilitate the development of the sustainable infrastructure required to meet the London Plan (2011) waste apportionment figures (Table 4-2) and net self sufficiency. The main types of waste produced include:

- Municipal Solid Waste
- Commercial and Industrial Waste
- Construction, Demolition & Excavation Waste
- Hazardous Waste
- Wastewater and Sewage Sludge

It should be noted that the London Plan (2011) apportionment targets are for municipal and commercial & industrial wastes, including the hazardous element of both, only.

3.2 Municipal Solid Waste

3.2.1 Municipal Solid Waste (MSW) in the West London Boroughs is managed by the WLWA and includes household waste, kerbside collected recyclables, green waste and waste and recyclables collected at household waste recycling centres.

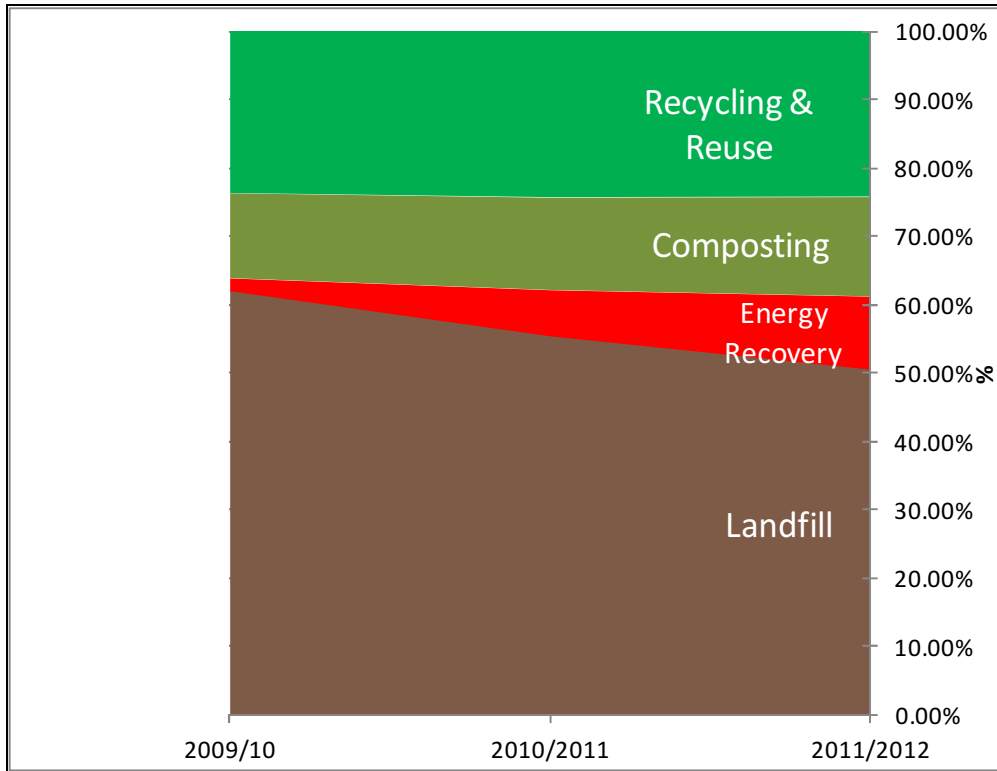
3.2.2 As the statutory body responsible for managing MSW generated in the West London Boroughs, the WLWA has in place long term contracts for the management of this waste. The main objective of the contracts is to end the landfilling of residual municipal waste. The contracts involve the management of up to 390,000 tonnes of MSW per year.¹⁴

3.2.3 Since 2008 there has been a steady decline in MSW sent to landfill from the Plan area, both in terms of the total tonnage sent and the percentage this represents of the area's total waste stream. Figure 3-1 below uses financial year data since 2008 and shows the different waste management routes used for the MSW stream. Note that the material initially sent to Materials Recovery Facilities (MRFs) is then sent on for management via other waste management routes.

¹⁴ See WLWA website for further detail <http://westlondonwaste.gov.uk/about-us/where-your-waste-goes/>

Figure 3 – 1 West London Waste Authority MSW management (2009 – 2012)

Financial years



Source: WLWA

3.2.4 In 2012 the WLWA and its constituent Boroughs dealt with around 657,000 tonnes of MSW, excluding abandoned vehicles. Of this total some 154,000 tonnes was recycled, 90,000 tonnes was composted, and 93,000 tonnes was sent to MRFs from which waste went on to other routes. Ultimately, 413,000 tonnes was sent either to Energy from Waste (EfW) or to landfill sites in Oxfordshire and Buckinghamshire (just over 80% by rail from the WLWA’s transfer stations in Brentford and South Ruislip). See Table 3-1 below.

Table 3-1: WLWA management of Municipal Solid Waste 2012
Calendar year (tonnes rounded to nearest 000 and percentages rounded)

Municipal Solid Waste management	Tonnes	Percentage
Recycling	154,000	23
Composting	90,000	14
Energy from Waste	117,000	18
Landfill	296,000	45
TOTAL	657,000	100

3.2.5 From 2009/10 increasing quantities of waste, not recycled or composted, have been diverted from landfill by sending it to EfW. The WLWA has a contract to send residual waste to the Lakeside Energy from Waste plant near Slough, until 2034/35. This contract has an annual tonnage of 25,000 tonnes until 2014/15 when for one year the tonnage increases to 45,000 tonnes. The following year (2015/16) the tonnage increases to 90,000 tonnes and remains at that level until the final year of the contract. In addition materials sent to certain MRFs in the Plan area are then sent to recycling, EfW and landfill respectively. The tonnages of these outputs are included in Table 3-1 and Figure 3-1 above (by financial year). This illustrates how the dominance of landfill has been broken by use of other management routes so that less than 50% of waste managed by the WLWA was actually landfilled in 2012 (calendar year).

3.3 Commercial and Industrial Waste

3.3.1 The most recent and comprehensive national Survey of C&I waste arisings¹⁵ took place in 2009. This survey estimated that West London produced 845,000 tonnes of C&I waste during that year, which is a reduction of 621,000 tonnes (42%) on the previous C&I Survey conducted in 2002/03 (this estimated that 1,466,000 tonnes of C&I waste was produced). Work carried out to underpin the London Plan (2011)'s apportionment targets has estimated that West London produced 1,299,000 tonnes of C&I waste in 2009 and for the purposes of consistency, this estimate has been used in the Plan. However the proposed Further Alterations to the London Plan (FALP) propose aligning the C&I waste baseline and forecasts with the national survey results. If the FALP is adopted as proposed, this would mean a significant fall in projected arising of this waste stream.

3.4 Construction, Demolition and Excavation Waste

3.4.1 A detailed study of arisings¹⁶ has been undertaken which estimated that just over 3 million tonnes of Construction, Demolition and Excavation waste (CD&E) waste is produced in West London each year. This is managed at sites within and beyond West London. This estimate is based on consideration of previous national surveys and analysis of data within the most recent Environment Agency Waste Data Interrogator (EA WDI).

3.4.2 According to the EA WDI 2012, around 776,000 tonnes of CD&E was imported for management at facilities within West London in 2012. This estimate is based on an analysis of waste managed at sites permitted for the management of waste by the Environment Agency, and does not account for aggregate production nor uses of CD&E in development (e.g. as an engineering material) which are exempt from the

¹⁵ DEFRA: *Commercial and Industrial Waste Survey 2009 Final Report (May 2011)* - <http://archive.defra.gov.uk/evidence/statistics/environment/waste/documents/commercial-industrial-waste101216.pdf>

¹⁶ CDEW *Baseline, Forecast & Target Setting Paper Final Issue v1.0 27.02.14*, BPP Consulting

need for a permit. Table 3-2 below shows the management of CD&E waste in West London based on 2012 data from the EA Waste Data Interrogator.

Table 3-2 Management of CD&E waste in West London 2012

	CD&E Arising in West London	CD&E Imported into West London	Total
Managed at permitted sites within West London	>331,000	776,000	1.107million
Managed at permitted sites beyond West London	411,000	N/A	N/A
Total	742,000	N/A	N/A

Source: EA Waste Data Interrogator 2012

3.5 Hazardous Wastes

3.5.1

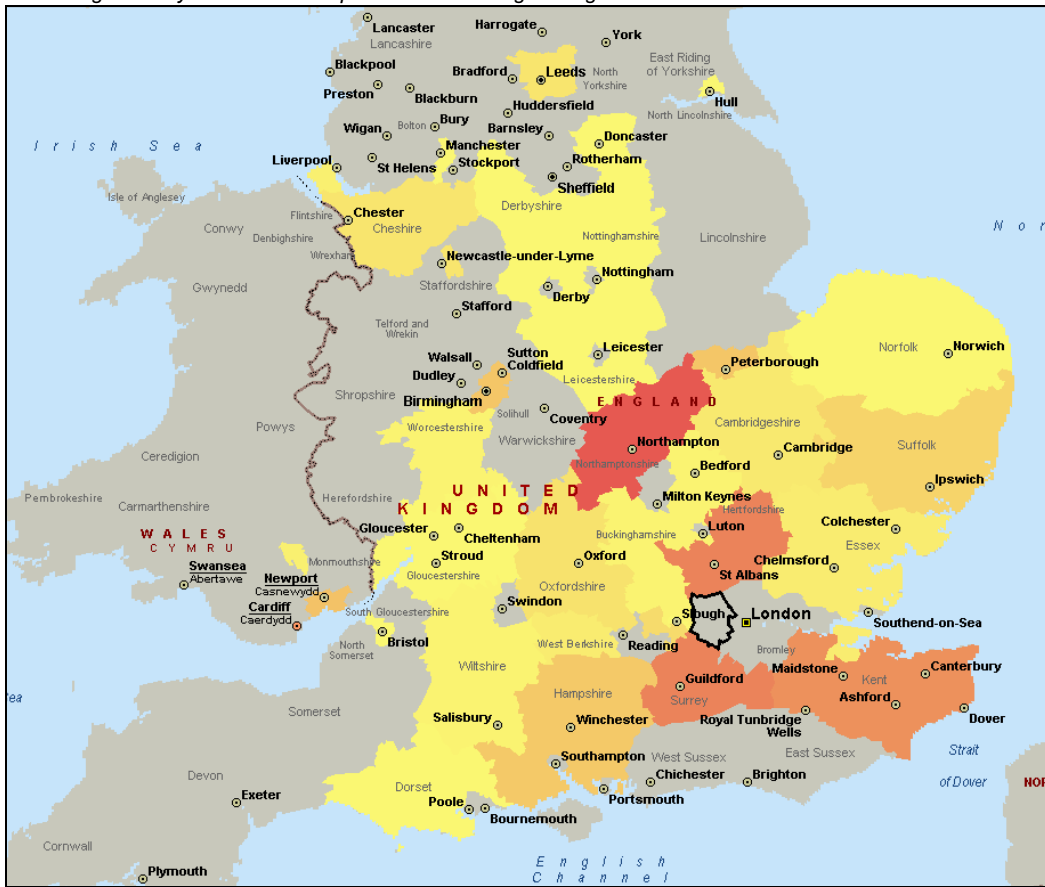
Hazardous wastes are categorised as those that are harmful to human health, or the environment, either immediately or over an extended period of time. They range from asbestos, chemicals, and oil through to electrical goods and certain types of healthcare waste. A detailed study of arisings¹⁷ has been undertaken which found the following:

- In 2012, West London produced just over 88,000 tonnes of which approximately 85% was exported for management.
- At the same time 20,000 tonnes was imported from outside the Plan area.
- Overall the Plan Area achieved 40% net self sufficiency in 2012.
- Hazardous waste requires a range of specialist facilities for treatment and disposal, but it is not anticipated that substantial additional need for new capacity locally will arise and so land allocations specifically for the development of additional hazardous waste management capacity have not been identified in this Plan.

¹⁷ Estimate of Baseline, Forecast, Management & Flows for Hazardous Waste Arising in west London Final issue v1.0 27.02.14, BPP Consulting

Figure 3-2 - Destination of hazardous waste arising from West London (2012)

Increasing intensity of colour corresponds to increasing tonnage sent.



Source: EA Hazardous Waste Interrogator (HWI) 2012 & EA Waste Data Interrogator 2012

- 3.5.2 In 2012, West London Boroughs exported hazardous waste to 38 different destinations across England, with the main ones being Northamptonshire, Hertfordshire, Surrey and Kent. The primary destinations of hazardous waste exported out of London generated in West London are shown in Figure 3-2 above.

3.6 Wastewater and Sewage sludge

- 3.6.1 Thames Water Limited is responsible for wastewater and sewage sludge treatment in London and, as part of this responsibility, it manages key pieces of sewerage infrastructure, including a number of sewage treatment works (STW). The majority of wastewater in West London is either treated at Mogden STW in Isleworth, Beckton STW in East London. During 2010, these facilities generated over 100,000 tonnes of sewage sludge (dry solids) with all of this sludge being recovered in some way either through incineration with energy recovery, recycled to agricultural land or used for land restoration.

3.7 Agricultural Waste

3.7.1 The Environment Agency Waste Data Interrogator (WDI) indicates that in 2012, a total of 7, 236 tonnes of waste from agricultural sources (EWC¹⁸ chapter 02 01) in West London was managed at waste management sites with Environmental Permits reporting through the WDI 99% of this was managed through treatment. However this figure doesn't include waste types which are known to be produced on farms recorded in the WDI under other waste codes. The main types of this type of waste include:

- Agricultural packaging such as plastic film;
- End of Life vehicles such as tractors;
- Tyres; and
- Asbestos construction waste.

Nor does it include waste managed through routes other than permitted sites. However, in light of the predominantly urban character of the Plan area there are limited opportunities for the production of this waste stream and so its management is not considered to be an issue needing specific consideration in this Plan.

3.8 Radioactive Waste

3.8.1 Limited information is available regarding the generation of radioactive waste in West London, with no arisings records held by either the Environment Agency or the Department of Energy and Climate Change. A detailed study of arisings¹⁹ has been undertaken which found the only identified sources that may generate small amounts of low level radioactive waste (LLW) and very low level radioactive Waste (VLLW) are at 21 locations across the Boroughs including hospitals, universities, research facilities and a few commercial operations.

3.8.2 Most radioactive waste produced by minor waste producers is not reported in the UK Inventory as it is either low volumes of LLW that can be disposed of by "controlled burial" at landfill sites under special licence, or low volume VLLW that is disposed within the MSW and C&I waste streams. As separate recording of VLLW production or management is not required it is not possible to quantify how much is managed from the Plan area. It is possible that some VLLW is managed at the Hillingdon clinical waste incinerator along with other wastes. The nearest available landfill accepting LLW is a nationally strategic site in Northamptonshire. In addition a High Temperature Incinerator in Fawley, near Southampton has some capability to deal with these types of waste. These facilities are preferred for use than sending it to the national LLW disposal facility near Drigg, Cumbria.

¹⁸ EWC = European Waste Classification

¹⁹ Review of Radioactive Waste Arising in west London Final Issue, BPP Consulting

3.8.3 There is no apparent market appetite or demand for a LLW management facility to be developed in the Plan area and so the practice of exporting those quantities that may be produced for management elsewhere is likely to continue. In light of this, the Plan does not include specific policies to cover such development.

3.9 Cross boundary Movement of Waste

3.9.1 Whilst around 1 million tonnes of West London's own waste is managed within West London Boroughs, waste also moves into and out of the Plan area for management. It is important to assess the level of this cross boundary movement of waste and to identify potential implications for the West London Waste Plan during the Plan period, particularly to meet the 'Duty to Co-operate'.

Table 3-3: Exports of waste out of West London by management type, 2012

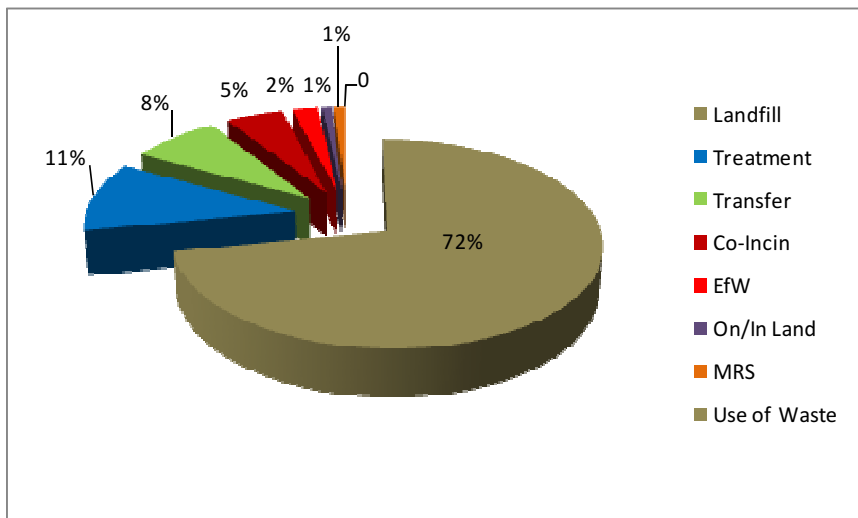
	<i>Tonnes</i>	<i>Principal Destination</i>	<i>Principal Management Route</i>
<i>Municipal Solid Waste (from WDF)</i>	<i>415,000</i>	<i>Bucks (35%) Oxon (33%) Slough (24%)</i>	<i>Landfill Landfill EfW</i>
<i>Commercial and Industrial Waste (from WDI +)</i>	<i>537,000</i>	<i>Bucks (33%) M Keynes (32%) Slough (15%) LB Southwark (6%) LB Bexley (5%) Herts (4%) NLWP (3%) Surrey (1%)</i>	<i>Landfill Landfill Co-Incineration Treatment Treatment Landfill Treatment Landfill</i>
<i>Construction, Demolition and Excavation Waste (from WDI)</i>	<i>412,000</i>	<i>Bucks (26%) M Keynes (24%) Slough (19%) Herts (11%) LB Greenwich (7%) NLWP (5%) Surrey (5%) Oxon (4%)</i>	<i>Landfill Landfill Landfill Landfill Treatment Treatment Landfill Landfill</i>
TOTAL	1.36 million		

NB: CD&E value excludes substantial quantities managed through activity that do not require permits

3.9.2 Around 1.3 million tonnes of West London's waste were exported out of London in 2012. This comprises Municipal Solid Waste (MSW), Commercial and Industrial Waste (C & I), Construction, Demolition and Excavation Waste (C, D & E) and certain types of hazardous waste. A proportion of this waste is handled by the WLWA. Table 3-3 above shows the level of exports or flows out of the West London area.

3.9.3 Landfill accounted for less than three quarters of the movements of all waste out of the Plan area in 2012 as shown in Figure 3-3 below which while varying from year to year is following a reducing trend.

Figure 3-3: Exports of waste out of West London by management type, 2012

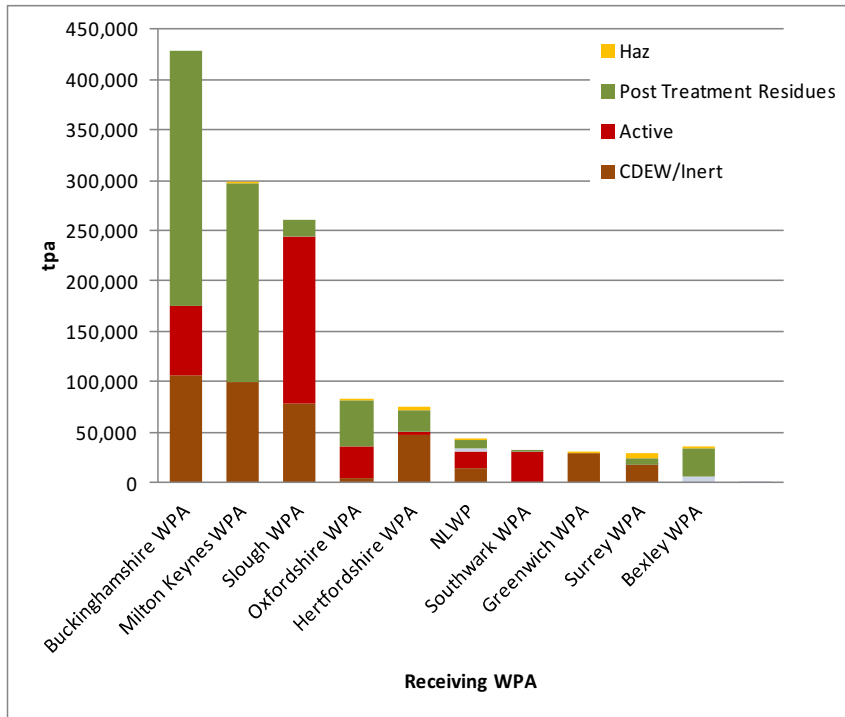


Source: WDI 2012

3.9.4 Figure 3-4 illustrates that the majority of waste exported in 2012 was sent to Buckinghamshire (31%), Milton Keynes (20%), Slough (19%) followed by Oxfordshire (11%) with the bulk of the remaining 19% divided between 6 other authorities. This has changed significantly from previous years when Bedfordshire received substantial quantities of waste for landfilling (just under 200,000 tonnes in 2011).

3.9.5 A high level totalling exercise of WDI 2012 data alone indicates that of the 2.37 million tonnes of waste received by permitted sites in West London from within the capital, up to 1.3 million tonnes comes from outside West London. This compares with 132,000 tonnes of waste from West London managed within the rest of London, which is only 10% of quantity of waste imported from London into West London. This demonstrates the significant contribution facilities within West London already make to the management of London's waste and overall target of achieving net self sufficiency by 2031.

Figure 3-4: Waste sent for management to any type of facility beyond the Plan area



NB: All 'active' i.e. biodegradable waste sent to landfill must be pre-treated in compliance with the Landfill Directive

Source: WDI 2012 plus EA Pollution Inventory

3.10 Role of Landfill in the Management of Residual Waste

- 3.10.1 Landfill disposal accounted for approximately 1,143,000 tonnes of waste arising in West London in 2012, with 90% of that exported to landfill facilities outside of the Plan area. The remaining 107,400 tonnes was managed at Harmondsworth Landfill located in southwest Hillingdon.
- 3.10.2 There are several different types of landfill, all of which play a different role in helping to manage waste from West London. Generally these are categorised by the types of waste they can accept for disposal. Table 3-4 below shows the types and amounts of waste sent to landfill from West London in 2012
- 3.10.3 Non-hazardous landfill usually receives residual MSW and C&I waste plus inert CD&E waste that is used for engineering and operational purposes, whereas Inert Landfill only receives inert waste from the CD&E waste stream. Hazardous waste landfills are highly specialised and only accept certain hazardous waste, while stable, non-reactive hazardous waste (SNRHW) (e.g. asbestos) sent to non-hazardous landfill can be deposited in an area specifically designed to accept SNRHW isolated from biodegradable waste.

Table 3-4 Waste sent to landfill from West London in 2012, by receiving site type

Type of waste received by site	Tonnes
Hazardous (SNRHW) via Separate Cell	5,459
Non Hazardous	1,079,915
Inert	57,655
Total	1,143,029

Source: WDI & HWI, 2012

4 Future Waste Management

4.1 How much waste will need to be managed in West London?

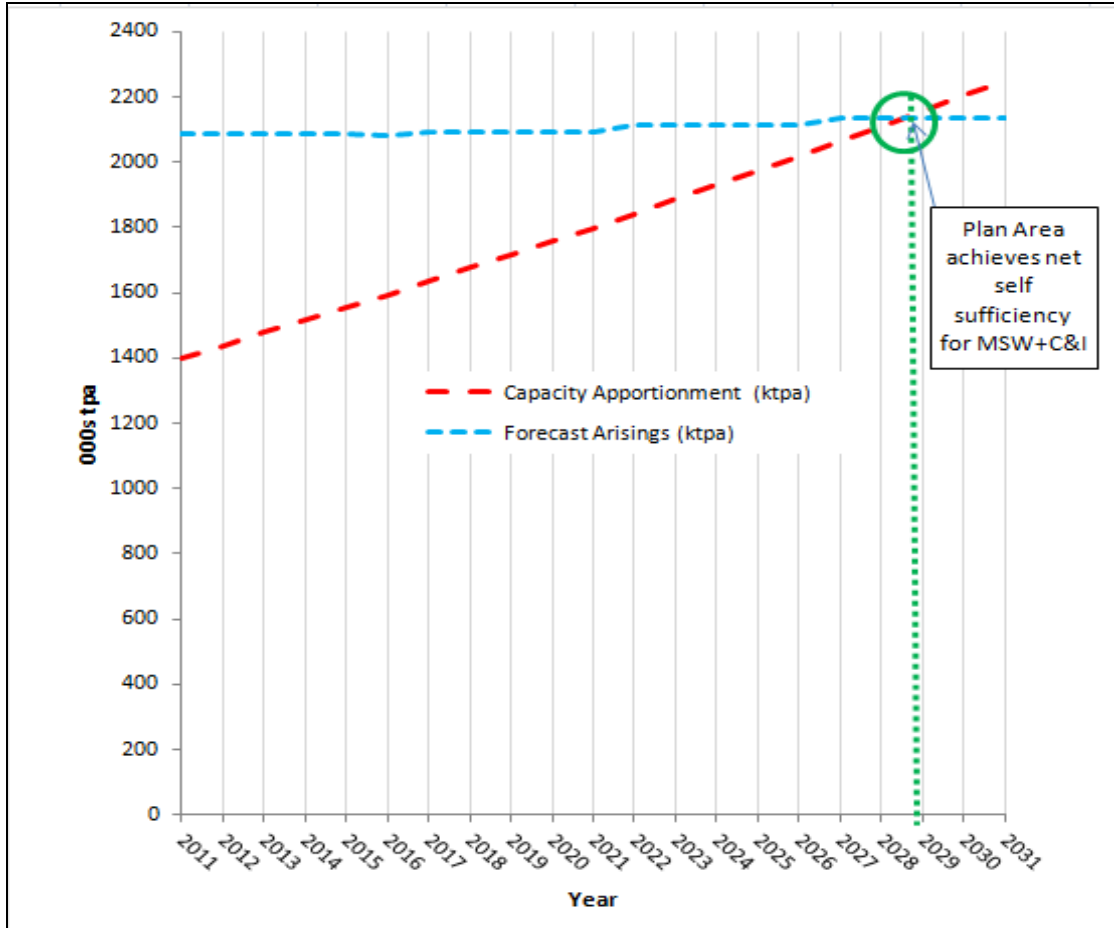
4.1.1 The London Plan (2011) sets a target for London of becoming net self-sufficient in the management of waste by 2031. To help achieve this target each borough has been given a share of London’s total MSW and C&I waste to manage (called the borough’s “apportionment” figure) for which it must identify sufficient and suitable existing waste management sites for the development of waste management capacity. The West London boroughs have pooled their apportionments and will meet the collective apportionment figures through this Plan.

4.1.2 MSW and C&I waste arisings projections are also included in the London Plan (2011). These figures were considered the most up-to-date for West London at the time and were also used by the Mayor to determine the apportionment figures. The waste arisings and apportionment figures for West London are displayed in Table 4 -1 below. Figure 4 -1 below shows the forecast arisings plotted against capacity apportionment targets from 2011 to 2031. It should be noted that CD&E wastes are not included in the waste projections but hazardous wastes from MSW and C&I sources are. These wastes are discussed in paragraphs 4.4 and 4.5 below.

Table 4-1: Quantity of MSW and C&I waste forecast to be produced in West London and the apportionment figures from the London Plan (2011) for target years

	2011	2016	2021	2026	2031
MSW arisings (tonnes per annum)	798,000	826,000	852,000	879,000	900,000
C&I waste arisings (tonnes per annum)	1,287,000	1,258,000	1,240,000	1,233,000	1,236,000
Total (MSW and C&I waste) arisings (tonnes per annum)	2,085,000	2,084,000	2,092,000	2,112,000	2,136,000
London Plan (2011) Apportionment (tonnes per annum)	1,399,000	1,595,000	1,798,000	2,019,000	2,250,000

Figure 4-1: Forecast arisings and capacity apportionment for West London Boroughs as set out in the London Plan (2011)



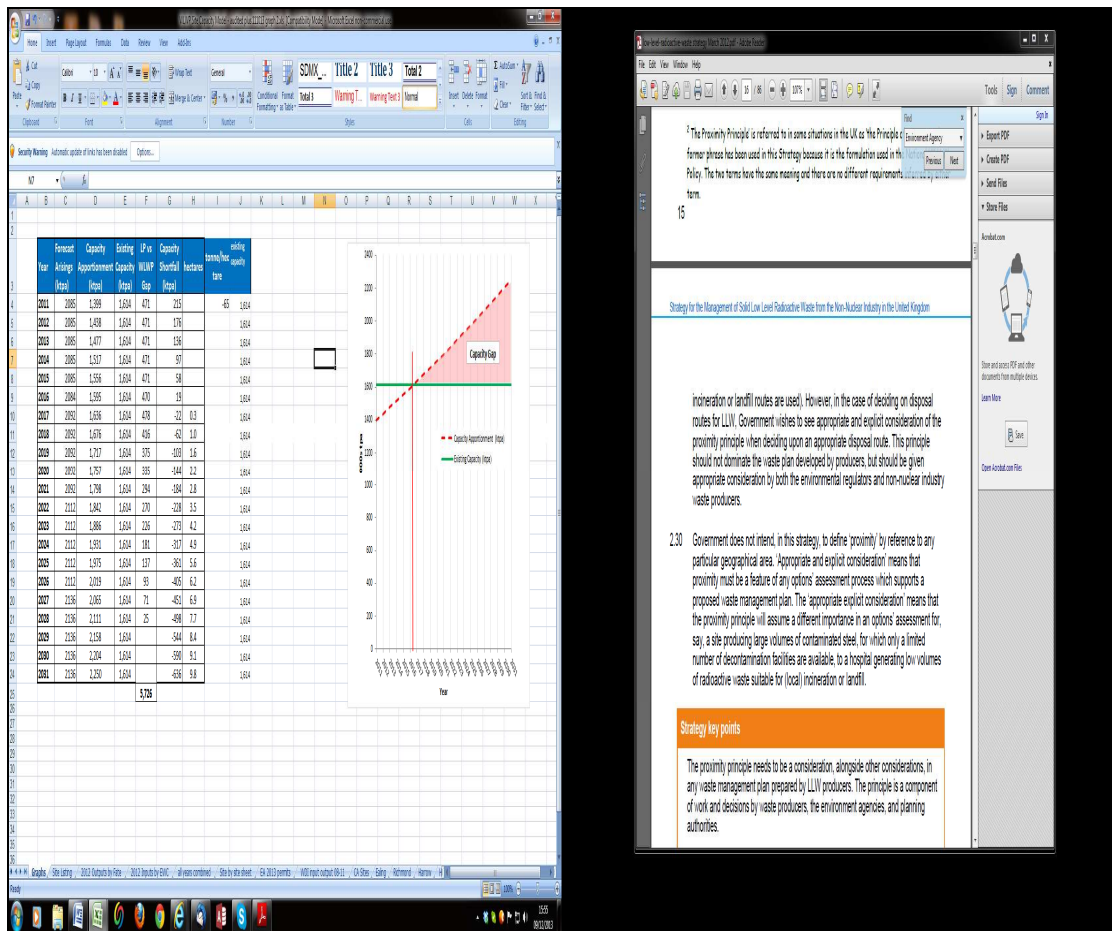
4.2 How much capacity is needed?

London Plan 2011 apportionment

- 4.2.1 The West London Waste Plan was prepared in accordance with the waste projections and apportionment figures contained in the London Plan (2011). The West London Boroughs are not required to meet the individual MSW and C&I waste apportionment figures in the London Plan (2011) separately as long as the total combined apportionment figure is addressed. This will require the delivery of sites and capacity as set out in the Plan.
- 4.2.2 Currently, West London has a range of sites where the management of MSW & C&I waste is taking place. The intention of the Plan is to prioritise the use of the existing sites in West London, including redevelopment of some waste management sites and depots, and then adding some new sites for waste management uses, as necessary.
- 4.2.3 Existing waste management capacity (excluding any landfill) in West London is 1.64 million tonnes per annum including both waste processing sites and the recycling undertaken at household waste and recycling centres (see Appendix 2).

Subsequently, additional waste management facilities will need to be developed in West London during the Plan period up to 2031 to address the ‘gap’ between the apportionment target and the waste management capacity that currently exists (see Figure 4-2 below). Table 4-2 below sets out the existing and projected waste management capacity in West London and the additional capacity required to address the apportionment ‘gap’ for target years.

Figure 4-2 Projected capacity gap (in pink) between London Plan (2011) apportionment and existing capacity



NB vertical red line indicates point at which apportionment exceeds existing capacity

4.2.4 For the six West London Boroughs to meet the London Plan (2011) apportionment targets for MSW & C&I waste, additional capacity of 162,000 tonnes by 2021, 383,000 tonnes by 2026 and 614,000 tonnes by 2031 will be needed (see Table 4-2 below). To determine what area of land will be required to provide this additional capacity, an average capacity of 65,000 tonnes per annum per hectare was used to calculate the

amount,²⁰ based on the range of possible processes and their processing intensity.

- 4.2.5 The London Plan (2011) does not prescribe the specific waste management technologies, their scale, or the number that will need to be implemented across London. Accordingly, the West London Waste Plan also does not take a prescriptive approach to what types of waste management facilities/technologies are required. This approach allows for innovation in the management of waste to be incorporated into proposed development in West London.
- 4.2.6 The land required to meet the apportionment capacity gap is also displayed in Table 4-2 below. This shows that by 2031, West London Boroughs will need to have an additional 9.4 hectares of land available for waste management.

Table 4-2: West London Capacity Requirements for Target Years based on the London Plan (2011)

	2011	2016	2021	2026	2031
Apportionment (tonnes per annum)	1,399,000	1,595,000	1,798,000	2,019,000	2,250,000
Total existing waste management capacity (tonnes per annum).²¹	1,636,000	1,636,000	1,636,000	1,636,000	1,636,000
Additional capacity required to meet the apportionment (tonnes per annum)	0	0	162,000	383,000	614,000
Land required to address the capacity gap (hectares)	0	0	2.5	5.9	9.4

- 4.2.7 To meet this land requirement, eight existing waste sites (accounting for 12.32 hectares) have been identified as suitable and available for redevelopment. An additional 3.20 hectares of land currently not developed for waste management use has also been identified as suitable and deliverable (see Section 5 for details of the sites).
- 4.2.8 Overall, it is thus estimated that within West London there are at least 15.52 hectares of land suitable and deliverable for development for additional waste related uses. This exceeds the notional land requirements of the London Plan (2011) apportionment targets and creates some flexibility in the Plan should some sites not come forward for development during the lifetime of the Plan. Annual monitoring of the Plan will help

²⁰ Calculations based on 'Table 4A.7 - throughput and land take of different types of facilities' from the London Plan (2008) and further discussions and agreement with the GLA in 2013.

²¹ This assumes that existing capacity remains constant via the operation of the safeguarding policy

assure that provision of capacity remains sufficient for the Plan period. The table below shows how the contribution of the allocated sites to the capacity required to meet the London Plan (2011) apportionment has been calculated.

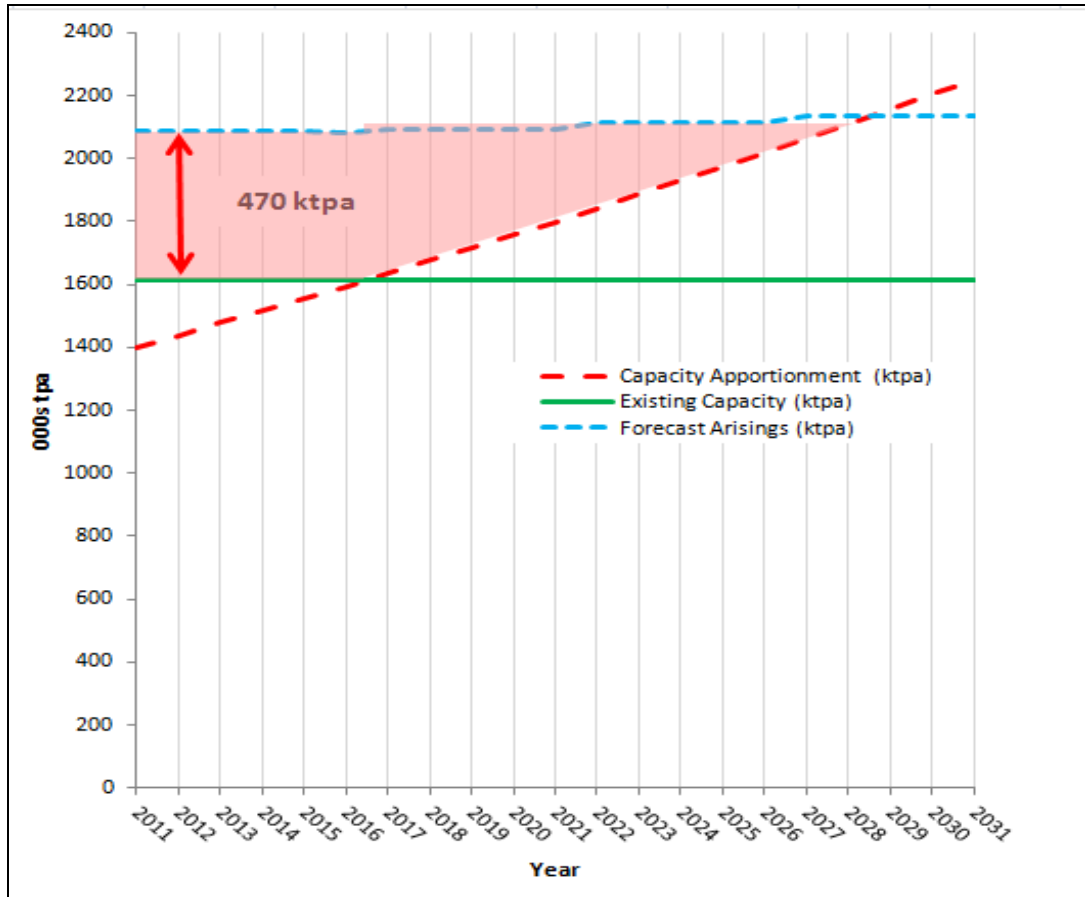
Table 4-3: Contribution of allocated sites to meeting the London Plan Apportionment

Site Name	Included Area (ha)	Potential contribution @ 65,000t/ha (tpa)	Existing Contribution (tpa)	Potential additional contribution
	Col1	Col2	Col3	Col4
		Col1 x 65,000	From WDI	Col2 minus Col3
Twyford Waste Transfer Station	1.24	80,600	22,714	57,886
Veolia/Brent Transfer Station & Depot	2.71	176,150	82,691	93,459
Greenford Depot (inc HWRC)	1.783	115,895	35,610	80,285
Rigby Lane Waste Transfer Station	0.91	59,150	25,280	33,870
Twickenham Depot	2.67	173,550		173,550
Quattro, Victoria Road, Park Royal	0.7	45,500		45,500
Forward Drive Depot	2.31	150,150	25,780	124,370
Western International Market	3.2	208,000		208,000
Total	15.523	1,008,995		816,920

Providing for the Plan area waste before net self sufficiency is achieved

4.2.9 National Planning Policy for Waste has a stated expectation that development plan documents should make provision for all waste arising within the Plan area. In this case the London Plan (2011) apportionment trajectory only aims for self sufficiency at 2029 (Figure 4 -1 above). Before that date a shortfall of capacity between forecast arisings and existing capacity is indicated if the apportionment targets are met on a progressive basis as suggested by the London Plan. This is illustrated in Figure 4 - 3 below. The pink section shows the theoretical gap were provision to be solely driven by the London Plan trajectory. The maximum amount per annum it represents is around 470,000 tonnes reducing from 2016 when planned provision to meet the apportionment target would start to kick in.

Figure 4-3 Interim capacity gap between existing capacity and arisings as forecast by London Plan (2011)



4.2.10 The following arrangements will operate in the interim. Firstly a long term contract for MSW has been entered into by the WLWA. This will involve the export of up to 300,000 tonnes per annum to an Energy from Waste facility in South Gloucestershire. In addition the WLWA has a contract to supply a minimum annual tonnage of 25,000 tonnes to Lakeside EfW plant until 2014/15 when the tonnage increases to 45,000 tonnes. The following year (2015/16) the tonnage increases to 90,000 tonnes and remains at that level until the final year of the contract in 2034/5. While this export of material to generate energy is not countable towards the apportionment targets under the terms of the London Plan (2011) it will account for the bulk of the shortfall. In addition around 70,000 tonnes of waste (as refuse derived fuel) may be sent to the Slough Heat & Power facility or exported abroad for energy recovery. So in total 460,000 tonnes per annum are accounted for to address the apparent shortfall. It should be emphasised that these arrangements reflect actual arrangements put in place and are not a strategy developed as part of the Plan-making process. However the fact that such long term arrangements catering for significant quantities of West London's waste exist, cannot be ignored.

4.3 What kind of facilities will be needed?

- 4.3.1 A range of different waste management facilities may be required to provide for management of waste within West London, including recycling, composting and energy recovery. Modern waste management facilities utilise clean technologies and are subject to stringent regulation and monitoring of their operations and impacts. Innovative design and architecture are important to ensure facilities are acceptable and sensitive to their settings, although many technologies can be housed in industrial building similar in appearance to a warehouse. Appendix 4 to this report gives a brief description of most of the principal waste treatment technologies.
- 4.3.2 It is important that modern methods of dealing with waste are found which also produce value added, usable outputs (including fuel, heat and power). Waste management facilities should be seen positively, as an opportunity rather than a 'bad neighbour', as they can be co- located with developments and industry to provide heat, power and other beneficial products potentially attractive to industrial, commercial and residential developments.
- 4.3.3 The West London Waste Plan identifies sites for general waste management use and sets out policies to ensure development is suitable for the site and its surrounding land uses. The Plan is designed to be flexible to allow for developments and improvements in waste management technologies and the changing habits of consumers and waste producers. Any planning application for additional waste management capacity will be considered against the West London Waste Plan policies, including those of the London Plan, and other relevant policies and material considerations and be subject to public consultation.

4.4 Construction, Demolition and Excavation Wastes

- 4.4.1 Construction, Demolition and Excavation (CD & E) waste is a large waste stream within London, although it is not included within the London Plan (2011) apportionment target assigned to boroughs. Work undertaken in support of the Plan has established that the Plan Area has a substantial quantity of processing capacity for this waste stream and that the London Plan (2011) city-wide targets of 95% recycling and reuse by 2020 are close to being met. This is expected to continue into the future and accordingly no allocations are made in this plan for facilities dealing specifically with such wastes. However the evidence also indicates that it is not possible for the more specific target of 80% of that recycling to be met in the form of aggregates by 2020 due to the lack of suitable waste. The preference in West London is to ensure more on-site recycling and re-use on construction sites together with effective use of existing waste management sites and the appropriate provision of facilities at mineral extraction sites to ensure adequate provision of treatment capacity for this waste stream. Particular policy encouragement will be given to development of capacity for the production of material suitable for use as substitutes for virgin materials such as recycled aggregates.

4.5 Hazardous Wastes

- 4.5.1 Policy 5.19 of the London Plan (2011) states that the Mayor will prepare a Hazardous Waste Strategy for London and will work in partnership with the Boroughs, the Environment Agency, industry and neighbouring authorities to identify the capacity gap for dealing with hazardous waste and to provide and maintain direction on the need for hazardous waste management capacity. This policy also directs that existing hazardous waste sites should be safeguarded unless compensatory provision is made. In January 2014 the Mayor released a report²² to help inform London's hazardous waste management capacity requirements and planning policy for the next iteration of the London Plan (FALP) adopted in 2015. This study is a non-statutory document and sets out the Mayor's understanding of London's hazardous waste management arrangements.
- 4.5.2 Work undertaken in support of the Plan²³ has established that the Plan area has a moderate level of capacity for this waste stream with a number of sites managing hazardous waste within the Plan area. Other flows have been tracked with the general finding being that waste of this type travels within 1.5 hours of the Plan area for treatment. The resilience of these flows have been confirmed by contacting the appropriate receiving authorities. It is not anticipated that a substantial local need for new capacity will arise and so land allocations specifically for the development of additional hazardous waste management capacity have not been identified in this Plan. However Policy WLWP 1 is included to encourage the development of further capacity where it is identified as being needed in the regional context. Planning applications for new hazardous waste facilities will be determined in the same way as applications for all waste management facilities and the capacity of hazardous waste facilities will be monitored closely to establish whether additional provision is required at a later date.

²² *London's Hazardous Waste A Report For The Mayor Of London, January 2014*

²³ *Estimate of Baseline, Forecast, Management & Flows for Hazardous Waste Arising in west London Final issue v1.0 27.02.14, BPP Consulting [MM1G]*

5 The Sites

- 5.1.1 In accordance with the criteria outlined in National Planning Policy for Waste, the West London Waste Plan identifies 8 sites which it considers will ensure adequate waste management provision for the lifetime of the Plan. The sites have been subjected to a detailed evaluation and assessment which is summarised in an accompanying report on the site selection process²⁴. A description of the sites proposed for allocation is included in Appendix 6.
- 5.1.2 The Plan identifies 15.52 hectares considered to be suitable and available on existing and new sites for future waste management located as per Figure 5-1 below. Table 5-1 sets out existing sites capable of redevelopment to expand existing capacity, while Table 5-2 refers to additional sites that may be developed for waste management purposes. Maps showing the location of the sites and their boundaries are also provided.
- 5.1.3 In order to retain flexibility and avoid stifling innovation, the Plan does not dictate which type of waste management technology could be developed in which location. Any proposal for development at any of the allocated sites will be considered against its consistency with all the policies of this Plan, as well as other policies included in the wider Development Plan for that area at that time. This means that it is possible that detailed assessment may reveal that certain proposals may not prove to be acceptable in certain locations as their predicted impacts on the surroundings cannot be adequately mitigated. However all the allocated sites have been assessed as broadly suitable for the development of additional waste management capacity that would count towards meeting the London Plan apportionment.

²⁴ WLWP Site Selection and Assessment Process – Summary Report February 2014 - <http://www.wlwp.net/documents.html>

Figure 5-1: Location Plan showing all allocated sites (Policies Map)

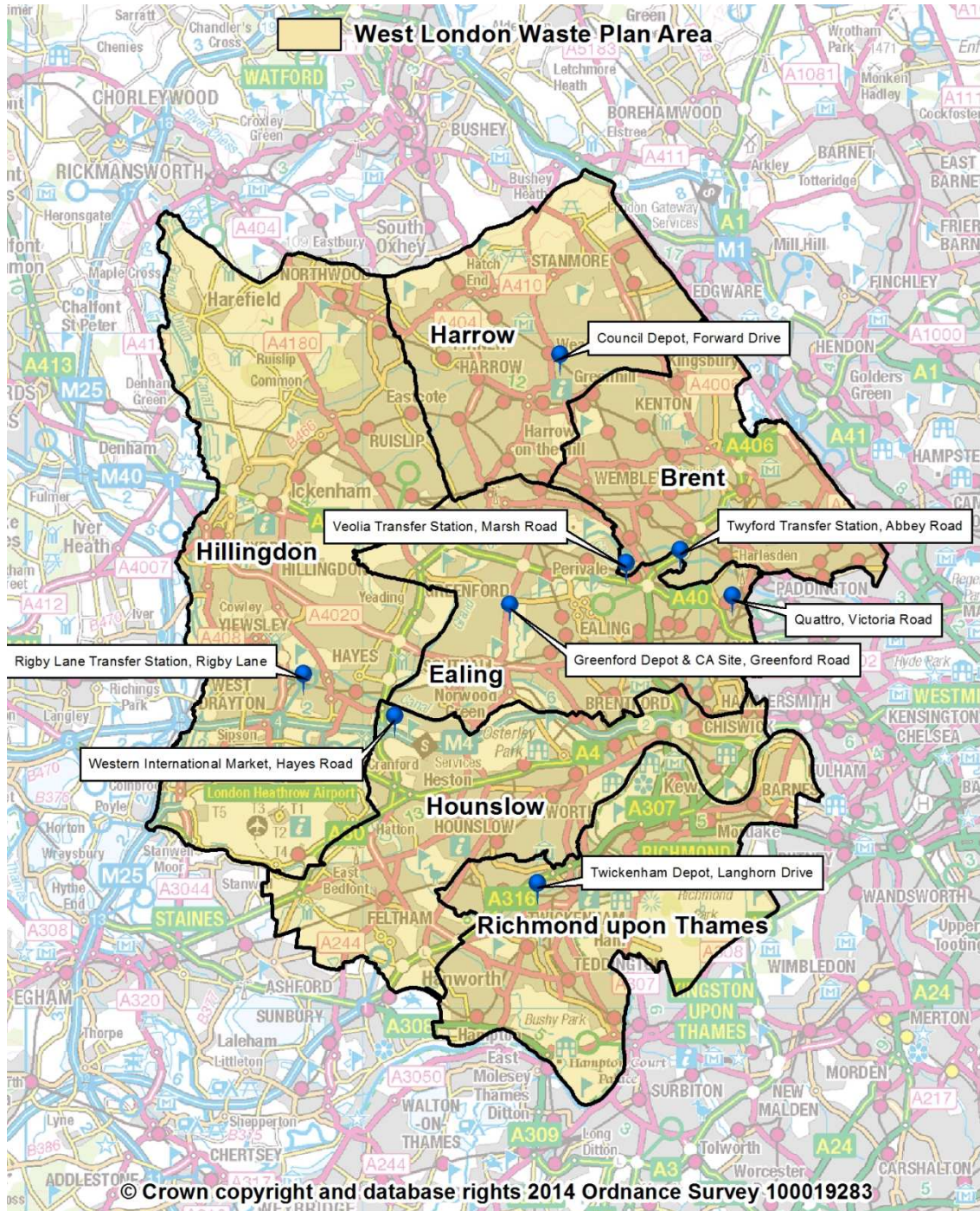


Table 5-1: Existing waste sites considered to have potential for redevelopment²⁵

Site Number	Description	Site Type	Site Area (ha)	Borough
352	Twyford Waste Transfer Station	Transfer Station	1.24	Brent
1261	Veolia Transfer Station, Marsh Road	Transfer Station	2.71	Brent
309*	Greenford Reuse & Recycling Site	Transfer Station	1.78	Ealing
310*	Greenford Depot, Greenford Road	Depot Facility		
328#	Quattro, Victoria Road, Park Royal	Transfer Station	0.7	Ealing
222	Council Depot, Forward Drive	Depot Facility	2.31	Harrow
331	Rigby Lane Waste Transfer Station	Transfer Station	0.91	Hillingdon
342	Twickenham Depot	Depot Facility	2.67	Richmond
Total			12.32	

**These two sites are contiguous and part of a larger site: for the purposes of the Plan, they are considered a single consolidated site*

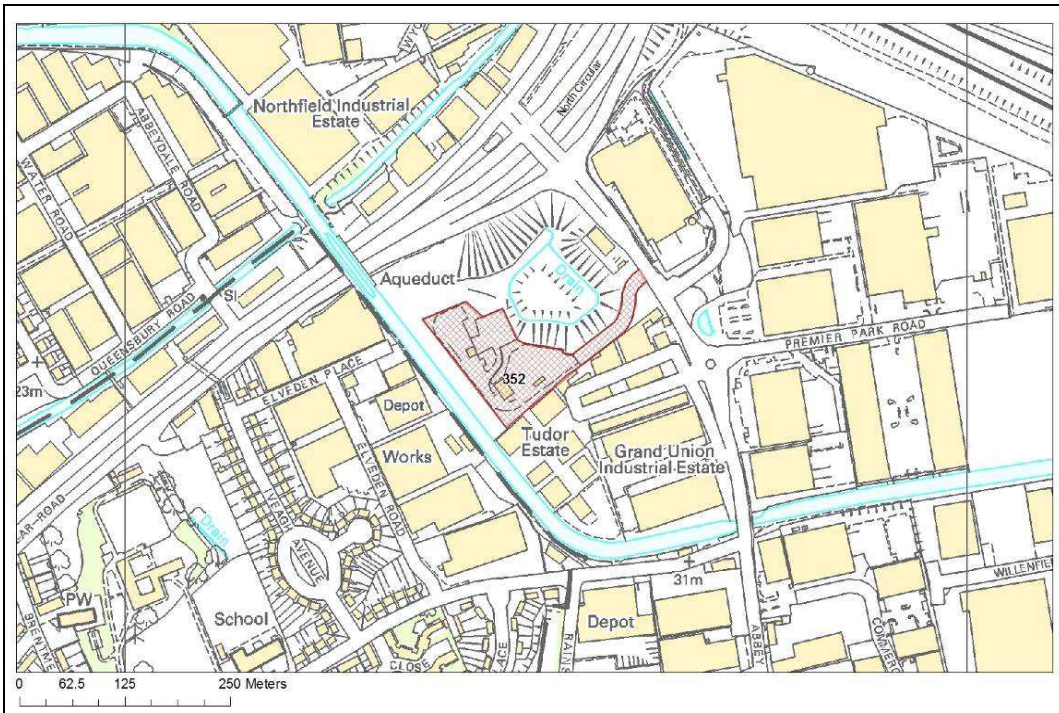
This site is subject to an HS2 Safeguarding Direction and will not be available from 2017 until 2024

High Speed 2 (HS2)

- 5.1.4 It should be noted that one of the sites proposed for allocation - Quattro at Victoria Road - has been identified by HS2 Ltd as requiring safeguarding under the HS2 Safeguarding Direction. This means that if HS2 proceeds it will only become available from 2024 for waste management uses, following its use to host a construction compound. The site has been included to provide a contingency capacity for the latter period of the Plan although it is not essential to meeting the apportionment targets of the London Plan (2011).

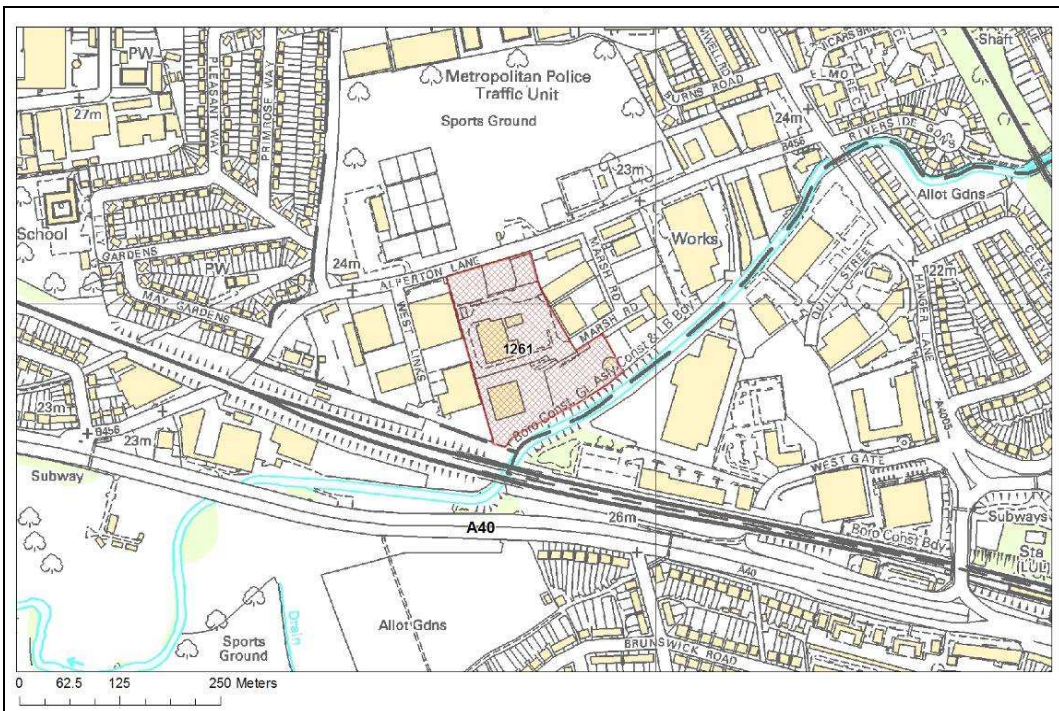
²⁵ 'Redevelopment' means changing existing waste management arrangements such that an increase in the site's recovery capacity is achieved.

Site 352 Twyford Waste Transfer Station, Abbey Road, Brent



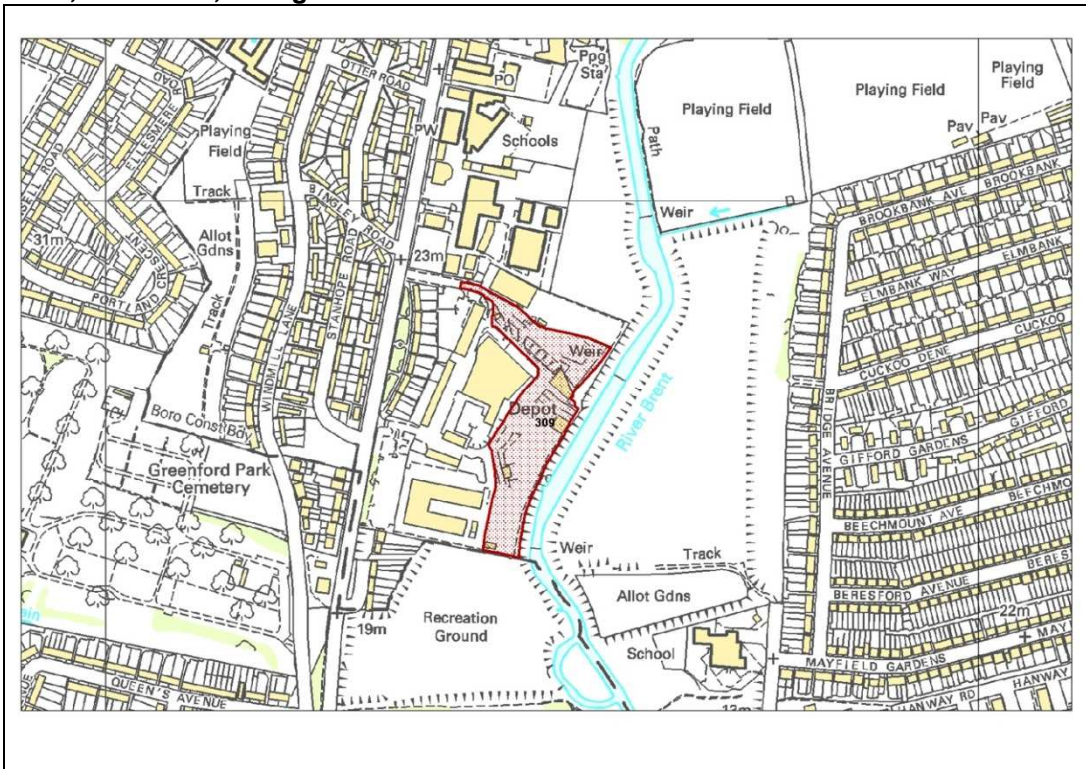
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Site 1261 Veolia Transfer Station, Marsh Road, Alperton, Brent



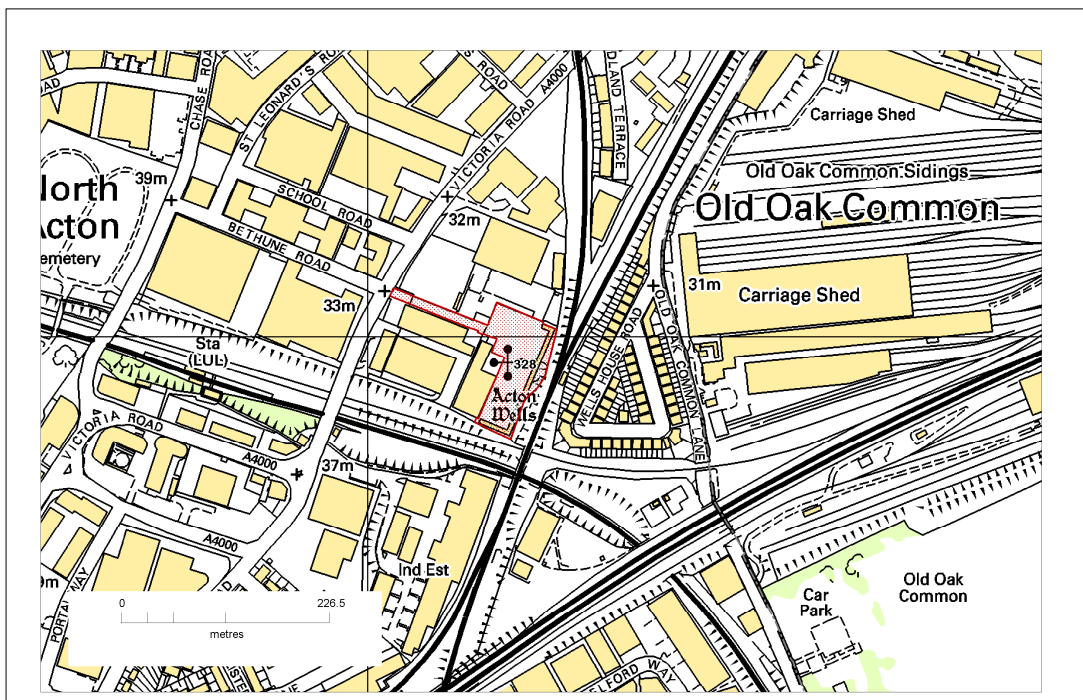
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Site 309 Greenford Reuse & Recycling Site & Site 310 Greenford Depot, Greenford Road, Greenford, Ealing



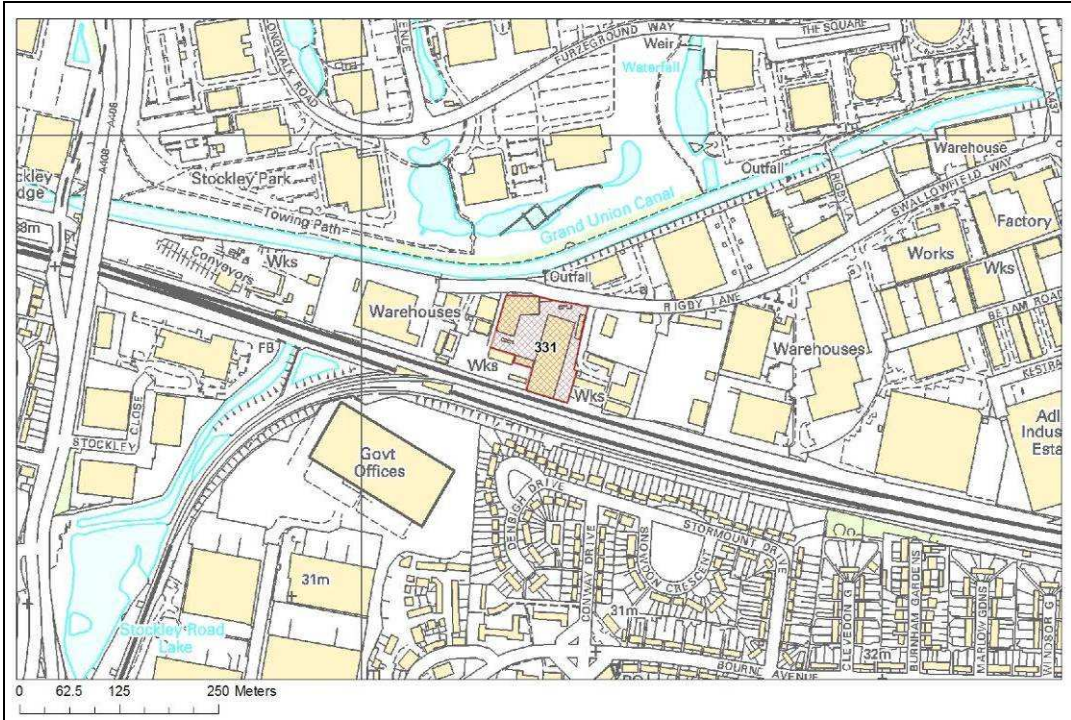
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Site 328 Quattro, Victoria Road, Park Royal, Ealing



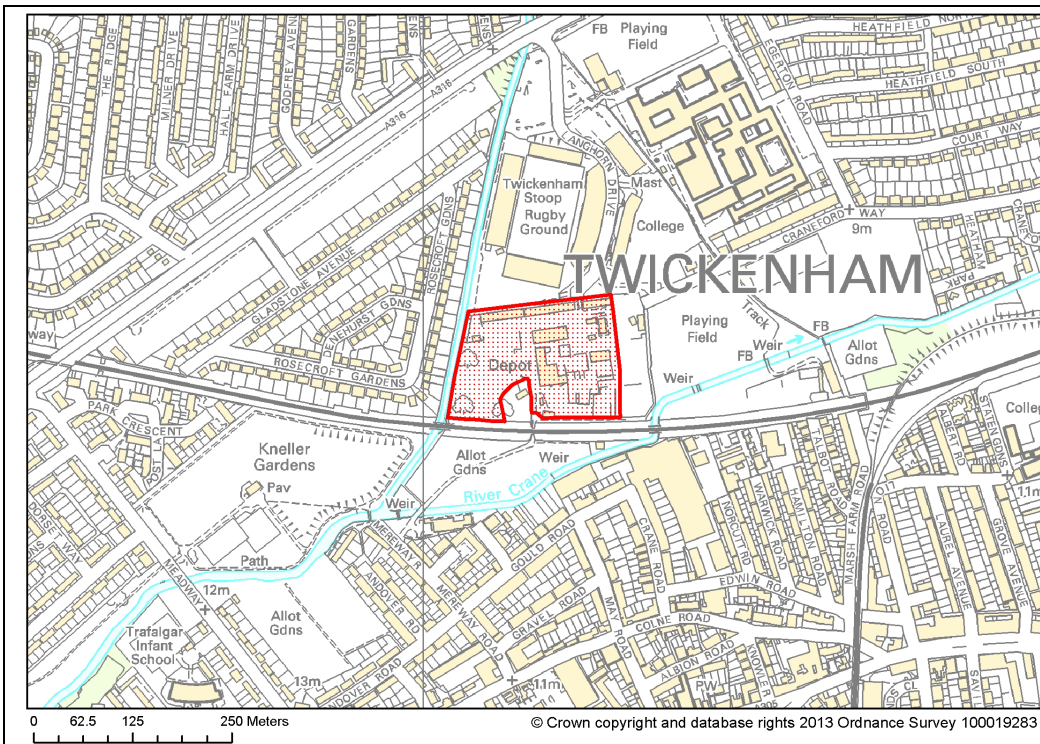
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Site 331 Rigby Lane Waste Transfer Station, Hayes, Hillingdon



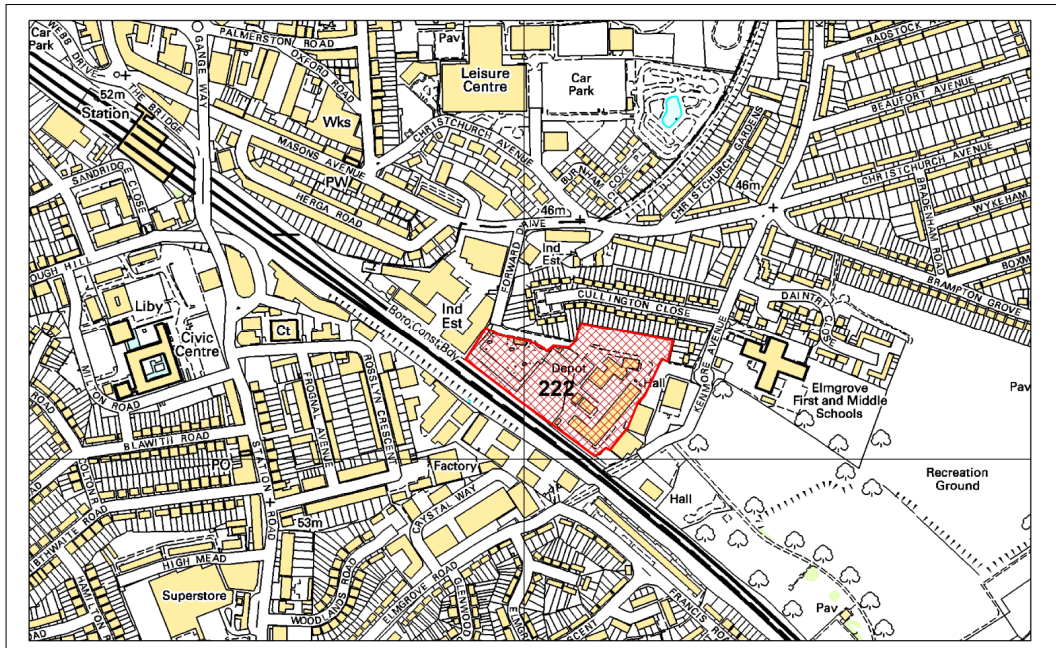
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Site 342 Twickenham Depot, Langhorn Drive, Twickenham, Richmond



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Site 222 Council Depot, Forward Drive, Harrow

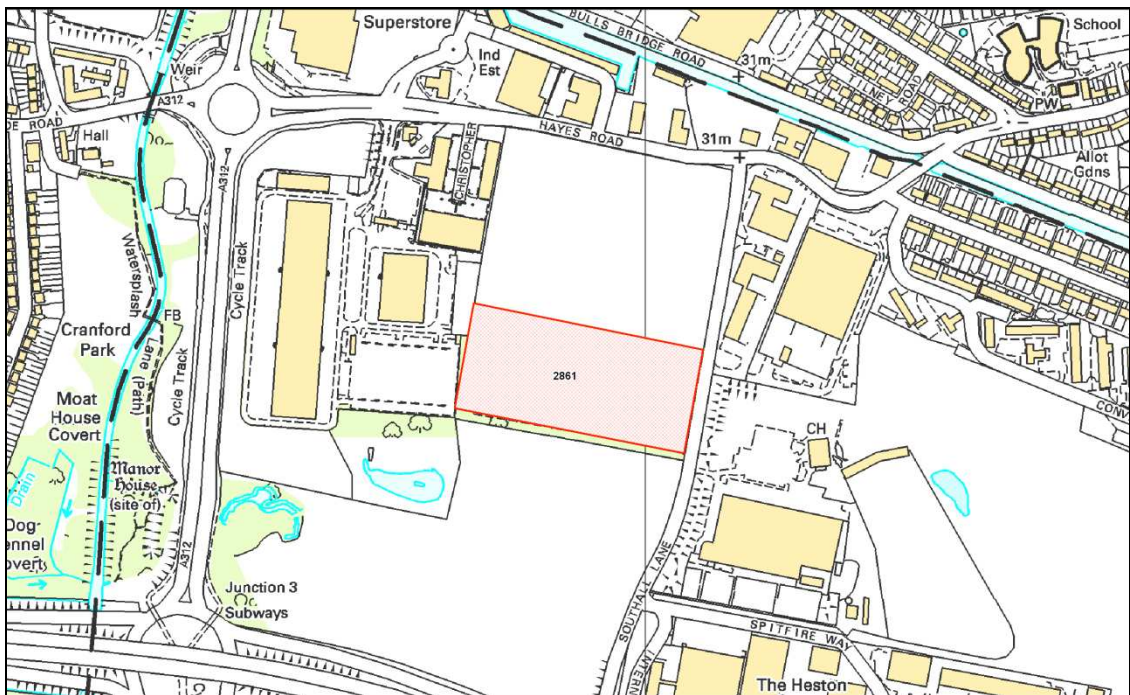


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Table 5-2: Additional sites with opportunity for developing waste facilities

Site Number	Site Name	Site Area (ha)	Borough
2861	Western International Market	3.20	Hounslow
Total		3.20	

Site 2861 Western International Market, Hayes Road, Southall, Hounslow



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6 West London Waste Plan Policies

6.1 Policy WLWP 1 – Provision of New Waste Management Capacity

- 6.1.1 The following policy is aimed at delivering the necessary minimum amount of additional waste management capacity of the right type and at the right time. Developments are to accord with all parts of the development plan unless material considerations indicate otherwise. Particular attention will be given to avoiding unacceptable harm to the environment and adverse effects on the well-being of communities.
- 6.1.2 In respect of Municipal Solid Waste, and Commercial and Industrial Waste, the main requirement arising out of the London Plan (2011) is to meet the stated apportionment for the six West London Boroughs combined. This is the principal aim of the policy. However, the current London Plan (2011) projections indicate that net self-sufficiency would not be achieved until 2029 for London as a whole. In the interim, there would be a gap between the quantity of eligible existing capacity within West London (the apportionment baseline of 1.64 million tpa) and the quantity of MSW and C&I waste forecast to arise in West London. In these circumstances, the provision of capacity to manage the requisite London Plan tonnages at a faster rate than indicated will be encouraged. The expectation is that substantive provision would be made on allocated sites (Policy WLWP 2) in the first instance. Any such provision should be consistent with the waste hierarchy.

Policy WLWP 1 - Provision of New Waste Management Capacity

Apportioned Waste – MSW & Commercial and Industrial Waste:

Over the period to 2031, there is a need for about 614,000 tonnes of additional annual capacity to meet the apportionment set in the London Plan (2011). This is to be delivered on the allocated sites identified in Policy WLWP 2 as follows:

- 162,000 tonnes in the period up to 2021
- A further 221,000 tonnes (total 383,000 tonnes) in the period 2021 to 2026
- A further 231,000 tonnes (total 614,000 tonnes) in the period 2026 to 2031

The requirement is for capacity in the re-use, recycling, and other recovery categories.

Provision over and above the tonnages required to meet the London Plan (2011) apportionment and of a nature similar to that identified above will be encouraged where this would contribute towards net self-sufficiency.

Provision should be made in accordance with the waste hierarchy,^{27a} and this should be addressed and justified as a pre-requisite of any grant of planning permission.

Non apportioned Waste:

Development of management capacity will be supported in principle that contributes towards net self sufficiency across the Plan Area for:

- a. Construction, Demolition and Excavation Waste in accordance with the waste hierarchy with particular support for the production of material suitable for use as substitutes for virgin materials such as recycled aggregates; and
- b. Hazardous waste treatment capacity that accords with any hazardous waste

6.2 Policy WLWP-2 Safeguarding and Protection of Existing and Allocated Waste Sites

- 6.2.1 A list of all the sites that are in existing waste management use in the West London Boroughs can be found in Appendix 2. These safeguarded sites form an essential resource for dealing with all waste streams within the Plan area and protection of these sites minimises the need for any additional sites and so they are all safeguarded. This also ensures general conformity with Policy 5.17 G (a) and paragraph 5.82 of the London Plan (2011). Policy WLWP 3 provides support for waste development proposals on existing sites.
- 6.2.2 The sites in Table 5.1 are those existing sites that are considered to have particular potential for redevelopment for future waste capacity expansion, including alternative forms of waste management that could result in waste moving up the hierarchy. Table 5.2 contains the additional site that is allocated in the Plan for future waste management facilities. The protection of these sites is required to ensure the West London Boroughs' pooled apportionment targets are met and thereby demonstrate general conformity with the requirement of the London Plan (2011).
- 6.2.3 The policies of this Plan apply to the existing management capacity for hazardous waste and to proposal's for additional such capacity.

Policy WLWP 2 – Safeguarding and Protection of Existing and Allocated Waste Sites

Land accommodating existing waste management uses in West London will be protected for continued use for waste management ^{27b}.

Existing sites which have been allocated as having the potential for capacity expansion by redevelopment (Table 5-1) and new sites with potential for development for waste management facilities (Table 5-2) will also be safeguarded.

To ensure no loss in existing capacity, re-development of any existing waste management sites must ensure that the quantity of waste to be managed is equal to or greater than the quantity of waste which the site is currently

permitted²⁶ to manage, or that the management of the waste is being moved up the waste hierarchy.

Development for non-waste uses will only be considered on land in existing^{27c} waste management use, or land allocated in Table 5-2 if compensatory and equal provision of capacity for waste, in scale and quality, is made elsewhere within the West London Boroughs.

6.3 Policy WLWP 3 – Location of Waste Development

- 6.3.1 To ensure conformity with the London Plan (2011), the Plan identifies 15.52 ha of land for the development of waste management facilities to meet the pooled apportionment for the six West London Boroughs up to 2031.
- 6.3.2 All existing waste management sites in the six Boroughs, allocated existing sites with potential for redevelopment, and new allocated sites are safeguarded for waste management uses under this Plan, unless an equal and compensatory suitable, acceptable and deliverable site can be provided, or there is an appropriate level of movement up the waste hierarchy.
- 6.3.3 The Plan identifies the safeguarded existing sites and proposed sites considered appropriate and suitable for waste management development as set out in Table 5-1 and Table 5.2. Policy WLWP 3 sets out the key criteria against which planning applications for waste management capacity will be determined.
- 6.3.4 Policy WLWP 3 also sets out the circumstances under which development proposed on unallocated or new sites may also come forward.
- 6.3.5 Assessments of ongoing requirements for capacity to meet the London Plan apportionment will take account of the most recent monitoring of the implementation of the Plan.

^{27a} Provision would not constrain movement up the waste hierarchy

^{27b} Existing waste management sites are those sites managing waste which are lawfully permitted to do so as set out in Appendix 2. The latest list of existing waste management sites will be found in Authority Monitoring Reports. Safeguarded existing permitted facilities will be shown on the Policies Maps associated within each Boroughs Local Plan.

²⁶ “permitted” = granted planning permission

^{27c} As stated in paragraph 5.14 the Quattro site is subject to HS2 safeguarding direction and therefore may be expected to be developed as an exception to this policy until 2024

Policy WLWP 3 – Location of Waste Development

Waste development proposals on existing waste management sites^{28A} and the sites listed in Table 5-2 will generally be supported, provided that the proposals comply with the Development Plan for the area.

Waste development on other sites will be supported in principle if the proposals comply with the other WLWP policies and the Boroughs' adopted development plans, and:

- a. It can be demonstrated that the development cannot be delivered at any available and suitable existing waste management site within the Borough²⁷ where the development is proposed and at the sites listed in Tables 5-1 and 5-2; and
- b. In the case of facilities proposed for the management of MSW and C&I waste, identified sites in Tables 5-1 and 5-2 have not come forward and it can be demonstrated that there will be a shortfall in the waste management capacity required to meet the Boroughs' joint apportionment target as specified in Policy WLWP 1; and
- c. There is no adverse cumulative effect, when taken together with existing waste management facilities, on the well-being of the local community, including any significant adverse impacts against the WLWP sustainability objectives (see Appendix 1); and
- d. The proposed site meets the criteria set out in the subsequent WLWP Policies if applicable.

6.4 Policy WLWP 4 – Ensuring High Quality Development

6.4.1 Modern waste management facilities should bring a benefit to the community and environment. 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 the local area. Developments should also comply with the London Plan, any borough Local Plans, Development Management Policy documents, Site Allocations and Area Action Plans.

6.4.2 As a general principle, all waste management developments will be expected to

^{28A} Existing waste management sites are those sites managing waste which are lawfully permitted to do so as set out in Appendix 2. The latest list of existing waste management sites will be found in Authority Monitoring Reports.

²⁷ Prospective developers are encouraged to contact the local planning authority for pre-application advice on suitability of existing sites. Suitability may be taken to mean capable of accommodating the type and scale of activity proposed including consideration of any specific requirements that arise from the Plan policies and operational needs

complement the surrounding area and act as a good neighbour to all existing and proposed uses²⁸ on neighbouring land and in the vicinity.

- 6.4.3 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 will be 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 enclosed with vertical sides with defined access and egress points.^{29A}
- 6.4.4 Developers will be expected to have actively considered innovative and sustainable design approaches to ensure that the development is in accordance with best practice and complements the local area in terms of topography, landscape and setting. Where necessary a Design and Access statement should be submitted to set out matters which include how the facility complements the local area and ensure that there is no significant effect on existing transport facilities, Public Rights of Way, or public safety.
- 6.4.5 Where sites include, or are likely to have an impact on the setting of a heritage asset, including archaeology, it should be demonstrated that the development will conserve the asset. Where the site has potential to include assets with archaeological interest, such as if it is in an archaeological area identified in a local plan or may affect a site recorded on the Greater London Historic Environment Record, an appropriate desk based assessment and where necessary, a field evaluation, will be required to accompany the planning application. Where such assessment and evaluation confirms a significant archaeological interest then appropriate mitigation by design or investigation will also be required.
- 6.4.6 The road network within West London is often congested and therefore proposals must demonstrate active consideration of transport modes other than by road. There must not be any significant or unacceptable adverse impacts on the local road network or other road users, in terms of congestion or parking associated with the development. Proposals should demonstrate that adequate parking for all vehicles is available on site.

²⁸ Proposed uses are those which have been granted planning permission and those allocations set out in adopted DPDs on neighbouring land and in the vicinity.

^{29A} Proposed control measures including the possible full enclosure of the waste handling (including processing and storage) operations where the site is located within an AQMA. The potential for waste handling activities to adversely affect air quality will depend both on the nature of materials and the processes to which they will be subjected. The requirement for full enclosure will take into account the likely impact that the waste handling operations will have on the achievement of the objectives of the relevant AQMA designation. Advice on the application of this requirement to a specific proposal should be sought from the local planning authority at pre-application stage.

- 6.4.7 If the proposed waste management development is required to have an Environmental Impact Assessment, then a Health Impact Assessment is also required.
- 6.4.8 The management of waste in accordance with the waste hierarchy is a key element of European, national and regional policy. The West London Boroughs support the increased management of wastes as far up the hierarchy as possible and each of the six Boroughs has a commitment to waste minimisation and recycling/reuse. Waste minimisation is also an important issue to the residents and community within West London.
- 6.4.9 The West London Boroughs support the use of local, reclaimed, renewable, recycled and low environmental impact materials in construction and estate management. Their details should be considered and included within the sustainable design and construction statement. Materials should be sourced from within 100km from the site, where available and appropriate.
- 6.4.10 Development should not exacerbate flood risk and should take place in accordance with the Environment Agency's policies on the protection of groundwater.

Policy WLWP 4 – Ensuring High Quality Development

All waste development proposals will be required to demonstrate, for both the construction and operational phases of the development, that:

- a. Development will be permitted only where it can be shown that unacceptable impact to local amenity will not arise from the construction and-operation of a facility;
- b. Adequate means of controlling noise, vibration, dust, litter, vermin, odours, air and water-borne contaminants and other emissions are incorporated into the scheme²⁹.
- c. The development is of a scale, form and character appropriate to its location and incorporates a high quality of design, to be demonstrated

²⁹ Where necessary, this is to be demonstrated through the submission of noise, air, odour and vibration surveys, impact assessments and proposed mitigation measures

^{31A} It should be assumed that waste management proposals will require a Transport Assessment although the need for one should be confirmed with the Highway Authority at the earliest opportunity.

- d. through the submission of a Design and Access statement³⁰ as appropriate;
- e. Active consideration has been given to the transportation of waste by modes other than road, principally by water and rail and this has been incorporated into the scheme or proven not to be practicable;
- f. Transport directly and indirectly associated with the development will not exceed the capacity of the local road network or result in any significant adverse impact on the amenities of the area. Where necessary, this is to be demonstrated by a Transport Assessment^{31A};
- g. An appropriate BREEAM³¹ or CEEQUAL³² rating, as specified in borough Development Plans, will be achieved;
- h. The development has no significant adverse effects on local biodiversity and it can be demonstrated that there will be no significant adverse impacts or effects on the integrity of an area designated under the “Habitats Directive”;
- i. There would not be a significant impact on the quality of surface and groundwater. The development incorporates the principles of Sustainable Drainage Systems (SUDS) unless evidence is provided to justify alternative drainage methods;
- j. There will be no increased flood risk, either to the immediate area or indirectly elsewhere. Where necessary^{33A}, this is to be demonstrated by a Flood Risk Assessment;
- k. Green Travel Plans have been considered, where appropriate.^{33B}
- l. The site does not contain features, or will not lead to substantial harm to, or

³⁰ Not all developments will need a Design and Access Statement - the need for such a statement is specified in legislation and reflected in local validation lists.

³¹ BREEAM: Building Research Establishment Environmental Method – an established method of assessing, rating and certifying the sustainability of buildings. www.breeam.org

³² CEEQUAL: Civil Engineering Environmental Quality Assessment and Award Scheme – a UK industry evidence scheme for assessing environmental and sustainability performance in civil engineering, infrastructure, landscaping and public realm projects. www.ceequal.com

^{33A} As specified by the National Planning Practice Guidance

^{33B} It should be assumed that waste management proposals will require a Green Travel Plan although the need for one should be confirmed with the Highway Authority at the earliest opportunity.

loss of significance of, any heritage assets such as conservation areas, archaeological sites, listed buildings etc;

- m. There is no foreseeable adverse impact on health, and where necessary this is to be demonstrated by a Health Impact Assessment.

In addition:

- n. Adjacent development proposals which would prevent or prejudice the use of safeguarded sites for waste purposes will be resisted unless suitable alternative provision is made.
- o. Applications shall provide details of the management arrangements for residues arising from any waste management facility.

6.5 Policy WLWP 5 – Decentralised Energy

6.5.1 New waste management and recycling methods can offer more efficient use of resources than existing waste management methods. Waste management facilities can also contribute to the provision of decentralised energy by providing heat and power for use in domestic and industrial processes.

6.5.2 The London Plan and emerging national planning policy guidance encourages boroughs to take opportunities for the development of combined heat and power technologies.

Policy WLWP 5 – Decentralised Energy

All waste management facilities that are capable of directly producing energy or a fuel must secure, where reasonably practicable:

The local use of any excess heat in either an existing heat network or through the creation of a new network;

The use of biogas/syngas in Combined Heat and Power facilities, either directly through piped supply or indirectly through pressurisation and transport;

The use of any solid recovered fuel in Combined Heat and Power facilities or as a direct replacement for fossil fuels in London; or

Any other contribution to decentralised energy in London.

Where it is demonstrated that the provision of decentralised energy is not economically feasible or technically practicable, the development shall not preclude the future implementation of such systems.

Energy from waste facilities will only be considered where it can be demonstrated

that they qualify as a recovery operation as defined in the Waste Framework Directive. Proposals for Energy from Waste should demonstrate that they will not compromise the management of waste in accordance with the waste hierarchy requirement of the Waste Framework Directive.

6.6 Policy WLWP 6 – Sustainable Site Waste Management

6.6.1 The management of waste in accordance with the waste hierarchy is a key element of European, national and regional policy. The West London Boroughs support the increased management of wastes as far up the hierarchy as possible and each of the six Boroughs has a commitment to waste minimisation and recycling/reuse. Waste minimisation is also an important issue to the residents and community within West London.

6.6.2 The West London Boroughs support the use of local, reclaimed, renewable, recycled and low environmental impact materials in construction and estate management. Their details should be considered and included within the sustainable design and construction statement and the Site Waste Management Plans. Materials should be sourced from within 100km from the site, where available and appropriate.

6.6.3 Site Waste Management Plans are intended to do the following:

- Describe each type of waste expected to be produced
- Estimate the quantity of each type of waste
- Identify the waste management action for each type of waste including re-using, recycling, recovery or disposal.

Once the development has commenced the developer should ensure the following takes place with respect to the plan:

- Review and update the plan
- Record quantities and types of waste produced
- Record the types and quantities of waste that have been:
 - Reused (on or off site)
 - Recycled (on or off site)
 - Sent of other forms of recovery (on or off site)
 - Sent to landfill
 - Otherwise disposed of

The Site Waste Management Plan should be updated to reflect the progress of the project.

Policy WLWP 6 – Sustainable Site Waste Management

To encourage sustainable waste management, waste management developments will be permitted where it can be demonstrated that:

- a. At least 10% of the materials or products used in the construction and operation of the development are re-used or recycled and sourced from within 100km from the site;
- b. Construction, demolition and excavation wastes are minimised and then reused or recycled on site, where practicable and environmentally acceptable; and
- c. Site Waste Management Plans are comprehensive and capable of being delivered.
- d. Where on-site management of waste is not possible, active consideration has been given to the transportation of construction, demolition and excavation wastes away from the site by modes other than road, principally by water and rail and this has been incorporated into the scheme or proven not to be practicable.

6.7 Policy WLWP 7 – National Planning Policy Framework: Presumption in Favour of Sustainable Development

6.7.1 The National Planning Policy Framework 2012 introduced the presumption in favour of sustainable development which applies to waste development.

Policy WLWP 7 – National Planning Policy Framework: Presumption in Favour of Sustainable Development

When considering development proposals, boroughs will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. They will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this waste plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the borough will grant permission unless material considerations indicate otherwise – taking into account whether:

- a. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in

the NPPF taken as a whole; or

- b. Specific policies in the NPPF indicate that development should be restricted.

7 Monitoring of the West London Waste Plan

7.1 Monitoring Mechanisms and Proposed Indicators

7.1.1 Once the West London Waste Plan is adopted, the implementation and effectiveness of its policies will be reported each year in each of the Boroughs' Authority Monitoring Reports. Monitoring will involve the collation of data to check progress against the Plan's objectives and implementation of the Plan's policies. For example, this mechanism will enable the West London Boroughs to compare quantities of waste actually produced with those forecast and to monitor development on the sites identified in the Plan. The Boroughs will then consider whether the allocation of sites is sufficient and whether the Plan needs reviewing and updating.

7.1.2 The proposed indicators to be used to report progress for each borough and the six combined West London Boroughs include:

- Quantity of each type of waste produced;
- Capacity (maximum permitted throughput in tonnes per annum) of new waste management facilities given planning permission in the previous year:
 - separately for MSW, C&I and CD&E
 - recycling and composting
 - other recovery
 - landfill;
- Additional waste management capacity (maximum permitted throughput in tonnes per annum) on:
 - sites allocated within the West London Waste Plan, and
 - non-allocated sites;
 - Loss of waste management capacity on:
 - sites identified as contributing to the London Plan (2011) apportionment
 - other sites;
- The quantity (maximum permitted throughput in tonnes per annum) of consented capacity that is actually active in any given year - active being accepting waste;
- The quantity (maximum permitted throughput in tonnes per annum) of consented capacity that is under construction in any given year;

- The quantity of municipal waste (tonnes) managed in the following ways:
 - Re-use;
 - recycling;
 - Composting
 - other recovery;
 - landfilled (showing whether management took place within or beyond the Plan area (where known));
- Comparison of municipal and commercial & industrial waste that is recovered compared with the apportionment targets set out in the London Plan (2011). This should show whether management took place within or beyond the Plan area (where known);
- Tonnage of construction, demolition and excavation waste managed, showing management method and whether management took place within or beyond the Plan area (where known);
- The quantity of recycled aggregates produced and other waste which could be used in place of primary materials following processing (in the Plan area);
- Tonnage of hazardous waste produced and managed, showing if management took place within or beyond the Plan Area;
- Amount of energy produced and delivered using waste as a fuel source; and
- Other indicators that may be decided to measure performance against policies and/or the Sustainability Indicators set out in the Sustainability Appraisal.
- the number of sites consented that offer non-road transport options, the number of those sites where such options have been implemented and the total tonnage transported through non-road options where known.

7.1.3 Where monitoring identifies that there is a major failure to meet the targets for waste management within the Plan area the six West London Boroughs will seek to identify the reasons why this is occurring and take effective management measures to rectify any problems that may put delivery of the Plan’s strategy at risk. The triggers for such an investigation are included in table 7-1.

7.1.4 Table 7-1 indicates how the policies of the Plan will be monitored.

Table 7-1 – Monitoring programme for the West London Waste Plan

WLWP Policy & Strategic Objective	Indicator	Reason	Delivery	Delivery Agency	Trigger for review of Plan/policy
Policy WLWP 2 & 3 Objectives 1, 2, 5	Number and capacity of safeguarded sites and amount of any compensatory land provided	To ensure no loss of waste capacity in the West London area	The planning process	Local Authorities Waste industry Developers	The waste management capacity provided by existing and allocated sites falls to a level 10% below or rises to a level 10% above that required by the London Plan apportionment
Policy WLWP 4 Objectives 1, 3, 4, 5	Number, type and capacity of waste facilities approved and completed at safeguarded sites and new identified sites Impact of new sites measured using: 1. Number of sites failing to comply with any relevant environmental permit 2. Number of enforcement complaints breaches of conditions 3. Negative impact/damage to heritage asset or setting	Compliance with sequential policy approach To ensure adequate waste capacity is being provided To ensure sites are not causing harm to the environment or communities including heritage assets	The planning process and combined private and public initiative to provide waste management developments	West London Waste Authority Waste industry	1. 10% of existing sites are failing to comply with any relevant environmental permit. 2. Substantiated complaints regarding permitted waste sites exceed one per borough in any six month period. 3. Breaches of

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WLWP Policy & Strategic Objective	Indicator	Reason	Delivery	Delivery Agency	Trigger for review of Plan/policy
					conditions exceed one per borough in any six month period. 4. One existing waste site causes a negative impact or damage to a heritage asset or setting (confirmed by English Heritage).
Policy WLWP 5 Objectives 1, 3, 5	Amount of energy produced and delivered	To ensure compliance with the aims of the London Plan (2011) and prescribed carbon savings	Through the planning and permitting process.	Local Authorities Waste industry Developers	One existing permitted thermal treatment facility operating without harnessing energy
Policy WLWP 6 Objectives 1, 2, 5	Amount of construction waste sent to landfill	To monitor progress towards Plan strategy of zero waste to landfill.	Use of Site Waste Management Plans; monitoring and enforcement of these and planning conditions	Developers West London Boroughs	Amount of construction waste sent to landfill (for non-engineering purposes) exceeds London Plan landfill diversion targets
Policy WLWP 7 Objectives 1, 5	The success of the implementation of Policy WLWP 7 will be dependent on the success of implementation of all other policies	To ensure compliance with the NPPF	Through the planning process	Developers West London Boroughs	N/A

7.2 The Boroughs will carry out appropriate inspections of waste facilities when investigating compliance with planning conditions and possible breaches of planning control.

7.3 Review of the West London Waste Plan

7.3.1 The Plan will be reviewed following adoption of the Further Alterations to the London Plan (FALP) and any other changes to the policies of the London Plan and at least every five years. In part this is to ensure that the Plan is still meeting the apportionment requirements of the London Plan (2011) and to take into account any changes to waste management capacity and the need for the identified sites.

8 Glossary

Term/Acronym	Definition
Anaerobic Digestion (AD)	A process whereby biodegradable material is broken down in the absence of air (oxygen). Material is placed into a closed vessel and in controlled conditions it breaks down into digested material and biogas.
Apportionment	Please see 'London Plan (2011) Apportionment'.
Area Action Plan	Type of Local Development Document focused on a specific location or area which guides development and improvements. It forms one component of a Local Plan.
Autoclave	A method of sterilisation. Waste is loaded into a rotating sealed cylinder and the biodegradable fraction of this waste is then broken down by steam treatment into a homogeneous 'fibre'.
Biodegradable	Biodegradable materials are generally organic, such as plant and animal matter. They can be chemically broken down by naturally occurring micro-organisms into simpler compounds. Waste which contains organic material can decompose producing bio-gas (methane) and other by-products.
Biodegradable Municipal Waste (BMW)	Waste from households and similar that is capable of undergoing natural decomposition such as paper and cardboard, garden and food waste. Typically BMW makes up around 68% of residual municipal solid waste (MSW).
Biogas	Biogas is a gaseous fuel, especially methane, produced by the fermentation of organic matter
Civic Amenity Site (CAS)	Facilities where members of the public can bring a variety of household waste for recycling or disposal. Materials accepted include, for example: paper, plastic, metal, glass and bulky waste such as tyres, refrigerators, electronic products, waste from DIY activities and garden waste. These sites are also known as 'HWRCs' (Household Waste Recycling Centres), or 'RRCs' (Reuse and Recycling Centres).
Climate Change	Regional or global-scale changes in historical climate patterns arising from natural and/or man-made causes that produce an increasing mean global surface temperature.
Clinical Waste	Waste arising from medical, nursing, veterinary, pharmaceutical, dental or related practices, (where risk of infection may be present).
Combined Heat and Power (CHP)	The use of heat (usually in the form of steam) and power (usually in the form of electricity). The heat can be used as hot water to serve a district-heating scheme while power is generally supplied to the National Grid.

Term/Acronym	Definition
Commercial and Industrial Waste (C&I)	Waste arising from business and industry. Industrial waste is waste generated by factories and industrial sites. Commercial waste is waste produced from premises used for the purpose of a trade or business or for sport, recreation or entertainment and arising from the activities of traders, catering establishments, shops, offices and other businesses. Commercial and Industrial waste may, for example, include food waste, packaging and old computer equipment.
Composting	A biological process which takes place in the presence of oxygen (i.e. it is aerobic) in which organic wastes, such as garden and kitchen waste are converted into a stable granular material. This material (compost) can be applied to land to improve soil structure and enrich the nutrient content of the soil.
Construction, Demolition and Excavation Waste (CD&E)	Waste arising from the construction, maintenance, repair and demolition of roads, buildings and structures. It is mostly composed of concrete, brick, stone and soil, but can also include metals, plastics, timber and glass. Generally collected in skips or trucks.
Department for Communities and Local Government (DCLG)	Government department with overall responsibility for, amongst other things, the planning system.
Department for the Environment Food and Rural Affairs (DEFRA)	Government department with national responsibility for waste management policy amongst other things.
Development Management Document	A set of criteria-based policies in accordance with the Local Plan, against which planning applications for the development and use of land and buildings will be considered. Also known as Site Development Policies.
Energy from Waste (EfW)	Energy that is recovered through thermally treating waste. EfW is also used to describe some thermal waste treatment plants.
Energy Recovery	The combustion of waste under controlled conditions in which the heat released is captured to provide hot water and steam (usually) for electricity generation (see also Recovery). For waste sent to energy from waste plants to qualify as recovery they should meet the R1 formula specified in the revised Waste Framework Directive.
Environment Agency (EA)	Environmental regulatory authority formed in 1996, that issues and monitors compliance with environmental permits. Referred to as a 'pollution control authority'

Term/Acronym	Definition
European Waste Catalogue (EWC)	A comprehensive listing of all wastes. Wastes are categorised using a 6 digit code which identifies the source of the waste. For example, EWC code 20.01.01 is paper and cardboard, separately collected from municipal waste, whereas 20.03.01 is mixed municipal waste. The full catalogue can be downloaded from: http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2000D0532:20020101:EN:PDF
Environmental Permit (EP)	A permit issued by the Environment Agency to regulate the operation of a waste management activity. Formerly known as a Waste Management Licence or PPC permit.
Examination	Process presided over by an Inspector appointed by the Secretary of State; this can consist of hearing sessions, or consideration of written representations to consider whether the policies and proposals of the local planning authority's Local Development Documents are sound. Only persons who have made representations seeking change to a Local Development Document at the submission stage are entitled to an oral hearing at the examination.
Gasification	The thermal breakdown of organic material by heating waste in a low oxygen atmosphere to produce a gas. This gas may then be used to produce heat/electricity or as a fuel/feedstock.
Greater London Authority (GLA)	Strategic citywide government for London. It is made up of a directly elected Mayor – the Mayor of London – and a separately elected Assembly – the London Assembly.
Green Belt	A planning designation intended to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns from merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
Green Waste	Organic waste from households, parks, gardens, wooded and landscaped areas such as tree prunings, grass clippings, leaves etc.
Greenhouse Gas	A gas in the Earth's atmosphere that traps heat and can contribute to global warming. Examples include carbon dioxide and methane.
Ha	Hectare (10,000m ² of area, which is equivalent to 2.47 acres).
Habitat Directive Assessment	This is a requirement of the European Habitats Directive. Its purpose is to assess the predicted impacts of plans and projects on internationally designated sites and nature conservation sites.
Hazardous Waste	Waste that has potentially damaging properties which may make it harmful to human health or the environment. It includes materials such as asbestos, fluorescent light tubes and lead-acid batteries. The European Commission has issued a Directive on the controlled management of hazardous waste; wastes are defined as hazardous on the basis of a list created under that Directive.

Term/Acronym	Definition
Heritage Asset	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. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).
Household Waste	Waste from homes or other specified premises, including waste taken to household waste recycling centres.
Household Waste Recycling Centre (HWRC)	Facilities to which the public can bring household waste, such as bottles, textiles, cans, paper, green waste and bulky household items/waste for free disposal. Otherwise known as Reuse & Recycling Centres or Civic Amenity Sites.
Incineration	The burning of waste at high temperatures in the presence of sufficient air to achieve complete combustion, either to reduce its volume (in the case of municipal solid waste) or its toxicity (such as for organic solvents). Municipal solid waste incinerators can recover power and/or heat. Incinerators are often referred to as EfW (energy from waste) plants.
Industrial Business Park (IBP)	Strategic employment location designed to accommodate general industrial, light industrial and research and development uses that require a higher quality environment and less heavy goods access than a Preferred Industrial Location.
Inert Waste	Waste that does not decompose or otherwise change.
In-vessel Composting (IVC)	Process to produce compost from green waste combined with food waste. It is a controlled process and is capable of treating both food and green waste by achieving the required composting temperatures. It is also known as enclosed composting.
Joint Municipal Waste Management Strategy (JMWMS)	The development of a Municipal Waste Management Strategy is a dynamic process and results in a clear framework for the management of municipal waste, and waste from other sectors as appropriate. It sets out how authorities intend to optimise current service provision as well as providing a basis for any new systems or infrastructure that may be needed. The Strategy acts as an up to date, regularly reviewed, route-map for further investment in management of MSW generated in the Plan Area.
Kerbside Collection	Any regular collection of waste/recyclables from premises, including collections from commercial or industrial premises as well as from households.
ktpa	Kilo-tonnes per annum (a kilo-tonne is 1,000 tonnes).
Landfill	The disposal of waste onto and into land, in such a way that pollution or harm to the environment is prevented and, through restoration, to provide land which may be used for another purpose.

Term/Acronym	Definition
Local Development Document (LDD)	Local Development Documents are statutory documents prepared under the Planning and Compulsory Purchase Act 2004, which set out the spatial planning strategy and policies for an area. They have the weight of development plan and are subject to community involvement, public consultation and independent examination.
Local Development Framework (LDF)	LDFs are now referred to as Local Plans. Formerly a portfolio of local development documents that provides the framework for delivering the spatial planning strategy and policies for an area.
Local Development Scheme (LDS)	A document setting out the local planning authority's intentions for its Local Development Framework; in particular, the Local Development Documents it intends to produce and the timetable for their production and review.
Local Plan	A Local Development Document (formerly known as a Core Strategy) which provides a written statement of the policies for delivering the spatial strategy and vision for a borough, supported by a reasoned justification.
London Plan (2011)	This is the Spatial Development Strategy for London. This document was produced by the Mayor of London to provide a strategic framework for the Boroughs' Local Plans. It was first published in February 2004 and alterations have since been published in September 2006, September 2007, February 2008 and July 2011. It has the status of a development plan under the Planning & Compulsory Purchase Act 2004.
London Plan (2011) Apportionment	A given proportion of London's total MSW and C&I waste (expressed in tonnes) allocated to each individual borough for which the borough must identify sufficient sites for managing and processing waste within their Local Plans.
Materials Recycling Facility or Materials Recovery Facility (MRF)	A sorting 'factory' where mixed recyclables are separated into individual materials prior to despatch to reprocessors who prepare the materials for manufacturing into new recycled products or use as a fuel.
Mechanical Biological Treatment (MBT)	A combination of mechanical separation techniques and biological treatment – either aerobic or anaerobic, or a combination of the two, which are designed to recover value from and/or treat fractions of waste to reduce its degradability and amount.
Mechanical Heat Treatment (MHT)	A combination of mechanical and heating techniques which are designed to sterilise, stabilise and treat waste and recover value from it.
Metropolitan Open Land	Metropolitan Open Land is afforded the same level of protection as the Green Belt. Designation is intended to protect areas of landscape, recreation, nature conservation and scientific interest within London which are strategically important.

Term/Acronym	Definition
Municipal Solid Waste (MSW)	Any waste collected by or on behalf of a local authority. For most local authorities the vast majority of this waste is from the households of their residents. Some is from local businesses and other organisations such as schools and the local authority's own waste.
National Planning Policy for Waste	Policy document produced by central government relating to planning for sustainable waste management that sets out a number of key concepts which should be considered and statutory requirements of local and regional planning policy documents. First published in October 2014.
Net self-sufficiency	Situation where there a balance between incoming and outgoing waste such that the Plan area deals with an equivalent amount of waste to that produced within its area.
Planning Policy Statement 10 (PPS10)	Precursor to National Planning Policy for Waste, policy document produced by central government relating to 'Planning for Sustainable Waste Management' which sets out a number of key concepts which should be considered and statutory requirements of local and regional planning policy documents.
Preferred Industrial Location (PIL)	Strategic employment site normally suitable for general industrial, light industrial and warehousing uses.
Policies Map	Formerly known as the 'Proposals Map', a map showing the location of the sites identified in the Plan
Pyrolysis	The heating of waste in a closed environment, in the absence of oxygen, to produce a fuel and char.
Railhead	This is a terminus of a railway line that interfaces with another transport mode e.g. road network.
RAMSAR	Sites which are wetlands of international importance designated under the Ramsar Convention.
Recovery	The process of extracting value from waste materials, including recycling, composting and energy recovery. For waste sent to energy from waste plants to qualify as recovery they should meet the R1 formula specified in the revised Waste Framework Directive.
Recycling	Recovering re-usable materials from waste for manufacturing into new products.
Refuse Derived Fuel (RDF)	Material produced from waste that has undergone processing that is suitable for use as a fuel. Processing can include separation of recyclables and non-combustible materials, shredding, size reduction, and pelletising. Similar to solid recovered fuel but more generic.
Residual waste	Residual waste refers to the material that remains that cannot practicably be recycled, re-used, or composted any further.
Re-use	The re-use of materials in their original form, without any processing other than cleaning and/or small repairs.

Term/Acronym	Definition
Re-use and Recycling Centre (RRC)	Facilities to which the public can bring household waste, such as bottles, textiles, cans, paper, green waste and bulky household items/waste for free disposal.
Scoping	The process of deciding the scope and level of detail of the strategic environmental assessment (SEA) or environmental impact assessment (EIA) which might be required to support a planning application.
Section 106 Agreement	A legal agreement between the planning authority (borough) and the developer, linked to a planning permission, which requires the developer to carry out works to offset the potential impacts of their development or to benefit the local community.
Site Development Policies	A set of criteria-based policies in accordance with the Local Plan against which planning applications for the development and use of land and buildings will be considered. To set out all qualifying site allocations other than those contained in Area Action Plans.
Site of Special Scientific Interest (SSSI)	A statutory designation that gives legal protection to specifically defined areas which have ecological or geological value.
Site Waste Management Plan (SWMP)	A detailed plan setting out how waste will be managed during a construction project.
Solid Recovered Fuel (SRF)	These are fuels prepared from non-hazardous waste to be used for energy recovery that meet a specified quality specification. (May also be known under more generic name 'Refuse Derived Fuels' or RDF)
Sound (Soundness)	According to the NPPF, for a plan to be "sound" it should be positive, justified, effective and consistent with national policy. "Justified" means that the document must be founded on a robust and credible evidence base and must be the most appropriate strategy when considered against the reasonable alternatives. "Effective" means that the document must be deliverable, flexible, and able to be monitored (see para. 1.6.4).
Spatial Planning	Spatial Planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function.
Special Protection Areas (SPA)	An SSSI which is considered to be of international importance designated under the EC Directive on the Conservation of Wild Birds.
Statement of Community Involvement (SCI)	A statement of a local authority's policy for involving the community in preparing and revising local development documents and for consulting on planning applications.

Term/Acronym	Definition
Strategic Employment Locations (SELs)	These comprise Preferred Industrial Locations, Industrial Business Parks and Science Parks and exist to ensure that London provides sufficient quality sites, in appropriate locations, to meet the needs of the general business, industrial and warehousing sectors.
Strategic Environmental Assessment (SEA)	A process of incorporating environmental considerations into policies, plans and programmes. It is sometimes referred to as a Strategic Environmental Impact Assessment and is a legally enforced assessment procedure required by European Directive 2001/42/EC.
Sub-Regions	Sub-regions are the primary geographical features for implementing strategic policy at the sub-regional level.
Sustainable Waste Management	Using material resources efficiently to cut down on the amount of waste we produce and, where waste is generated, dealing with it in a way that actively contributes to economic, social and environmental goals of sustainable development.
Sustainability Appraisal (SA)	A formal process and statutory requirement which analyses and evaluates the environmental, social and economic impacts of a plan or programme. May be conducted with SEA.
Sustainability Appraisal Commentary	A commentary report that raises sustainability issues relating to the Issues and Options report.
Syngas	Syngas is short for 'synthesis gas' which is a mixture of carbon monoxide and hydrogen produced industrially, from the treatment of waste.
Transport for London (TfL)	Body responsible for London's transport system. The primary role of TfL, which is a functional body of the Greater London Authority, is to implement the Mayor of London's Transport Strategy and manage transport services across London.
Thermal Treatment	Treatment of waste using heat e.g. incineration, pyrolysis, gasification, etc.
tpa	Tonnes per annum.
Unitary Development Plan (UDP)	A type of development plan introduced in 1986, which was replaced by Local Development Frameworks, which in turn have been replaced by Local Plans.
Waste Arisings	The amount of waste generated in a given locality over a given period of time.
Waste Collection Authority (WCA)	Organisation responsible for collection of household wastes e.g. your local council.
Waste Local Plan (WLP)	Planning document which provides a basis for the provision of waste management infrastructure in a sub-region e.g. the West London Waste Plan (see 'West London Waste Plan').
Waste Disposal Authority (WDA)	Organisation responsible for disposing of municipal waste. For West London this is the West London Waste Authority (WLWA).

Term/Acronym	Definition
Waste Hierarchy	An order of waste management methods, enshrined in European and UK legislation, based on their predicted sustainability. The hierarchy is summarised as “prevention, preparing for re-use, recycle/compost, other recovery, dispose”.
Waste Management Capacity	The amount of waste currently able to be managed (recycled, composted or recovered) by waste management facilities within a given area.
Waste Management Licence (WML)	Licence required by in most cases where proposes to deposit, recover or dispose of most waste. These are now known as an Environmental Permit.
Waste Minimisation	Reducing the quantity of waste that is produced. This is at the top of the Waste Hierarchy.
Waste Planning Authority (WPA)	Local authority responsible for waste planning. In West London each of the six Boroughs are the Waste Planning Authority for their respective areas.
Waste Transfer Station	A facility where waste is delivered for bulking prior to transfer to another place e.g. landfill. Some sorting may take place there too.
West London Waste Authority (WLWA)	West London’s statutory waste disposal authority. The WLWA’s main function is to arrange the disposal of waste collected by its six constituent Boroughs.
West London Waste Plan (WLWP)	The Waste Local Development Document being produced for West London (see ‘Waste Local Plan’).

9 Appendices

Appendix 1: Sustainability Objectives

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Appendix 1 – Sustainability Objectives

No	Objectives
1	To create conditions to improve health and well being of the community
2	To improve health and safety of workers
3	To reduce waste related crime
4	To actively challenge discrimination in a consistent and comprehensive way and ensure equal access to waste management services
5	To promote social inclusion and ensure that waste management sites do not have a disproportionate effect on communities
6	To protect, manage and, where possible, improve local environmental quality (noise, air quality, light, vermin etc.)
7	To ensure active voluntary and community engagement in decision making for waste planning
8	To provide opportunities for waste education and awareness raising
9	To reduce the need to travel and improve choice and use of more sustainable transport modes
10	To minimise the impacts of waste related transport by promoting sustainable transport including rail and water freight transport options
11	To protect and, where possible, enhance biodiversity
12	To protect and improve surface and Groundwater quality
13	To reduce the risk and impacts of flooding
14	To use derelict, vacant or previously developed land and buildings
15	To prevent air pollution or limit it to levels that do not damage natural systems (including human health)
16	To encourage energy efficiency, maximise use of renewable energy sources and minimise greenhouse gas emissions
17	To mitigate the impacts of climate change
18	To protect maintain and enhance the quality, integrity and distinctiveness of West London's open space/green infrastructure, landscape and townscape including its historic environment and cultural assets
19	To minimise the production of waste and increase reuse, recycling, composting and recovery rates
20	To improve utilisation of waste related resources
21	To minimise the impacts of hazardous waste
22	To actively promote clean technologies, particularly potential growth sectors of the economy
23	To ensure that West London uses natural resources more efficiently and sustainably in particular land, mineral aggregates and water
24	To promote sustainable design and construction techniques for both new and existing waste management facilities
25	To maximise economic opportunities and benefits for development of waste management facilities

26	To ensure that inward investment projects are environmentally, socially and economically sustainable
27	To maximise opportunities for the local workforce

Appendix 2– Existing Waste Sites in West London

Operator Name	Facility Name	Site Activity	Borough	Counted Against Apportionment?
Ace Waste Haulage Ltd	Neasden Goods Yard	CDE Waste Processing/ Transfer	Brent	
G. Pauncefort	Steele Road, London	CDE Waste Processing/ Transfer	Brent	
X - Bert Haulage Ltd.	Neasden Goods Yard	CDE Waste Processing/ Transfer	Brent	
X- Bert Haulage Ltd (Glynn Skips)	Fifth Way, Wembley	CDE Waste Processing/ Transfer	Brent	
Biffa Waste Services Ltd	Wembley Transfer Station & Recycling Facility	MSW&C&I Waste Processing/ Transfer	Brent	✓
Seneca Environmental Solutions Ltd	Hannah Close, Neasden	MSW&C&I Waste Processing/ Transfer plus biomass CHP	Brent	✓
Veolia	Veolia Transfer Station, Marsh Road	MSW&C&I Waste Processing/ Transfer	Brent	✓
West London Waste Authority	Twyford Waste Transfer Station	MSW&C&I Waste Processing/ Transfer	Brent	✓
Metal & Waste Recycling Ltd	Mitre Works, Neasden Goods Yard	Metal Recycling & Vehicle Depollution	Brent	✓
Brent Oil Contractors Ltd.	Fourth Way Waste Transfer Facility	Oil Reclamation Facility	Brent	✓
Wembley Car Breakers	Edwards Yard Mount Pleasant	Vehicle Depollution	Brent	✓
Bridgemarts Ltd (Gowing & Pursey)	100 Twyford Abbey Road	CDE Waste Processing	Brent	
London Borough Of Ealing Council	Acton Waste & Recycling Centre	Civic Amenity Site	Ealing	✓
London Borough of Ealing	Greenford Reuse & Recycling Site,	Civic Amenity Site	Ealing	✓
O C S Group U K Ltd.	Unit 2 & Yard, Sovereign Park, Park Royal Site	Clinical Waste Transfer	Ealing	✓
Yeoman Aggregates Ltd	Stone Terminal, Acton	CDE Waste Processing	Ealing	
Quattro (UK) Ltd	Victoria Road, Park Royal	CDE Waste Processing/ Transfer	Ealing	
Bridgemart Ltd (Gowing & Pursey)	Atlas Wharf	CDE Waste Processing/ Transfer	Ealing	
Bridgemart Ltd (Gowing & Pursey)	Horn Lane Waste Transfer Station	CDE Waste Processing/ Transfer	Ealing	
Iver Recycling (U K)	British Rail Goods	CDE-Processing/	Ealing	✓

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Ltd	Yard, Greenford	Transfer		
D B Schenker Rail (UK) Ltd.	Willesden Freight Terminal	Waste Transfer	Ealing	
Environmental Tyre Disposals Ltd	Chase Road, Park Royal	C&I Waste Processing	Ealing	✓
London Borough Of Richmond	Greenford Depot, Greenford Road,	MSW&C&I Waste Processing/ Transfer	Ealing	✓
London Auto Parts Ltd	Alperton Lane, Wembley	Metal Recycling	Ealing	✓
London Borough of Harrow	Forward Drive C A Site, Harrow	Civic Amenity Site	Harrow	✓
Metronet Rail B C V Ltd	Ruislip Underground Depot	CDE Waste Transfer	Harrow	
Paxton Recycling	Barratt Way, Wealdstone	MSW&C&I Waste Processing/ Transfer	Harrow	✓
R J Gower & G G Gower	Roxeth Green Avenue, South Harrow	Metal Recycling	Harrow	✓
Harrow Breakers	Pinner View, Harrow	Vehicle Depollution	Harrow	✓
Powerday Plc	Yiewsley Rail Sidings, Temporary H W R C	Civic Amenity Site	Hillingdon	
SRCL Ltd	Hillingdon Hospital	Clinical Waste Incinerator	Hillingdon	✓
Personnel Hygiene Services Ltd	Pump Lane Ind. Estate, Hayes	Clinical Waste Transfer	Hillingdon	✓
Country Compost Ltd	Crows Nest Farm, Harefield	Composting	Hillingdon	✓
West London Composting Ltd	High View Farm, Harefield	Composting	Hillingdon	✓
West London Composting Ltd	Pylon Farm, Harefield	Composting	Hillingdon	✓
A & A Recycling Ltd	Wallingford Road, Uxbridge	CDE Waste Processing/ Transfer	Hillingdon	
Bridgemart Ltd (Gowing & Pursey)	Civic Way, Waste Transfer Station	CDE Waste Processing/ Transfer	Hillingdon	
Envirowayste (London) Ltd	Trout Lane Depot, West Drayton	CDE Waste Processing/ Transfer	Hillingdon	
Heathrow Airport Ltd	Cranford Lane T S, Heathrow	CDE Waste Processing/ Transfer	Hillingdon	
P G Allen	Allens Yard, Hayes	CDE Waste Processing/ Transfer	Hillingdon	
Uxbridge Skip Hire Ltd	Harvil Road, Harefield	CDE Waste Processing/ Transfer	Hillingdon	
F M Conway Ltd	Bulls Bridge, Yeading Brook, Hayes	CDE Waste Treatment Plus gulley emptying processing	Hillingdon	✓ (gulley emptying only counts as MSW)

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Iver Recycling (UK) Ltd.	Holloway Lane Materials Recycling Facility	MSW/ C&I Waste Processing/ Transfer	Hillingdon	✓
L J Grundon & Sons Ltd	High View Farm, Harefield	CDE Waste Processing/ Transfer	Hillingdon	
Hep Oils	Waybeards Farm, Harefield	Oil Reclamation Facility	Hillingdon	✓
Kershire Ltd	Station Goods Yard, West Ruislip	MSW&C&I Waste Processing/ Transfer	Hillingdon	✓
London Borough Of Hillingdon	New Years Green Lane Civic Amenity Site	Civic Amenity Site	Hillingdon	✓
SITA UK Ltd	Victoria Road Waste Transfer Station, South Ruislip	MSW&C&I Waste Transfer	Hillingdon	
Balfour Beatty Rail Projects Ltd.	Ruislip Depot Hazardous Waste Containment Bay	Hazardous Waste Transfer	Hillingdon	
Powerbuild Ltd.	Downes Barns Farm Golf Course, Northolt	Land Recovery	Hillingdon	
B F A Recycling Ltd	New Years Green Lane, Harefield	Metal Recycling	Hillingdon	✓
SITA Wastecare Ltd	Rigby Lane Waste Transfer Station	Metal Recycling	Hillingdon	Inactive
Johal Mya Waste Management Ltd.	Wallingford Road Recycling Facility	MSW&C&I Waste Processing/ Transfer	Hillingdon	✓
Car Spares of West Drayton Ltd	Riverside Cottages, West Drayton	Vehicle Depollution	Hillingdon	✓
London Borough of Hounslow Council	Space Way Civic Amenity Site	Civic Amenity Site	Hounslow	✓
Heathrow Airport Ltd	Heathrow Airport Camp 4	Composting	Hounslow	✓
London Borough of Hounslow Council	Bridge Road Depot, Pears Road	CDE Waste Transfer	Hounslow	
Fowles Crushed Concrete Ltd	Bedfont Trading Estate, Feltham	CDE Waste Treatment	Hounslow	
Day Group Ltd	Brentford Aggregate Materials Recycling Facility	CDE Waste, MSW & C&I Processing	Hounslow	✓(MSW/C&I only)
Ron Smith (Recycling) Ltd	St Albans Farm Recycling Facility, Feltham	CDE Waste Processing/ Metal Recycling	Hounslow	✓(Metal only)
Rentokil Initial Services Ltd	Brentford Service Centre, West Cross Ind Park	Clinical Waste Transfer	Hounslow	✓
Veolia E S Cleanaway (UK) Ltd	Bedfont Way, Feltham	General Waste Transfer	Hounslow	Inactive
SITA UK Ltd	Transport Avenue Transfer Station,	MSW & C&I Waste Transfer & Civic	Hounslow	✓(CA only)

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Operator Name	Facility Name	Site Activity	Borough	Counted Against Apportionment?
	Brentford	Amenity Site		
Hounslow Homes Ltd	Ashmead Road Depot	Hazardous waste transfer	Hounslow	
Mayer Parry Recycling Ltd	Transport Avenue, Brentford	Metal Recycling	Hounslow	✓
Thames Water Utilities Ltd	Mogden Sewage Treatment Works, Isleworth	Sewage Treatment	Hounslow	
Goldstar Commercials	North Feltham Trading Est., Feltham	Vehicle Depollution	Hounslow	✓
Whitton Salvage	Kneller Road, Whitton	Vehicle Depollution	Hounslow	✓
London Borough Of Richmond	Townmead Civic Amenity Site, Kew	Civic Amenity Site	Richmond	✓
The Royal Botanic Gardens	The Royal Botanic Gardens, Kew	Composting	Richmond	✓
London Borough Of Richmond	Twickenham Depot	CDE Waste Transfer	Richmond	
Oakland Golf & Leisure Ltd.	Richmond Park Golf Club	Land Recovery	Richmond	
Sharpes Recycle Oil Ltd.	Arlington Oil Reclamation Facility, Twickenham	Oil Reclamation Facility	Richmond	✓

Appendix 3 - Supporting Assessments

Strategic Flood Risk Assessment

The Strategic Flood Risk Assessment (SFRA) was undertaken to ensure that flood risk is considered as part of the spatial planning process. As required by the National Planning Policy Framework, 2012, we have used the findings of the Strategic Flood Risk Assessment on regional and local flood risk issues in the assessment of sites suitable for waste management.

Equalities Impact Assessment

The Equalities Impact Assessment (EqIA) was undertaken to ensure that the West London Waste Plan does not discriminate against specific target groups. The Equalities Impact Assessment of the Issues and Options identified the options that may have a negative impact on certain target groups. Since the development of the Plan's policies, a further assessment has been undertaken and suggested mitigation has been incorporated into the Plan and Sustainability Appraisal Report. We have taken this into account when developing the Plan to ensure that no target group experiences a high level negative impact from the West London Waste Plan. The EqIA was published alongside the draft Proposed Submission Version of the Plan.

Habitats Regulations Assessment

The Habitats Regulations Assessment relates to Natura 2000 sites designated under the European Habitats and Birds Directive³³.

In October 2009 a screening exercise was carried out to determine the need for a Habitat Directive Assessment of the potential impacts of the West London Waste Plan's Issues and Options upon any European designated site located within 10 km of the six West London Boroughs. The report concluded that some of the Issues and Options had the potential to impact the Natura 2000 sites identified, and that an Appropriate Assessment and ascertainment of the effect on site integrity was required. A further screening exercise was undertaken to determine whether any of the recently developed policies are likely to trigger the need for a full Habitats Directive Assessment of the Plan, in compliance with the EC Habitats Directive.

The Plan policies have now been updated to incorporate the recommendations from the Habitats Regulations Assessment Screening. The Screening Report therefore concludes that the Plan is unlikely to have an adverse effect on the qualifying features of any Natura 2000 sites and therefore no further work is required.

³³ *European Directive 992/43/EC on the conservation of natural habitats and of wild fauna and flora and European Directive 79/409/EEC on the conservation of wild birds.*

The Strategic Flood Risk Assessment, Equalities Impact Assessment and Habitats Directive Screening Assessment can be found at <http://www.wlwp.net/>.

Appendix 4: General Waste Treatment Facility Descriptions

Facility type	General Description	General Appearance
Anaerobic Digestion	Anaerobic Digestion is only suitable for organic wastes such as food and garden waste. The waste is enclosed in tanks without oxygen and digested to produce a biogas which can be used as a fuel. A sludge is also produced which can be composted and used on land.	Large industrial tanks and warehouse-type buildings.
Composting	Composting facilities are generally enclosed in special units to minimise odours. Enclosed composting units can compost food and garden waste collected from homes and businesses.	Generally housed inside warehouse type buildings.
Gasification/ Pyrolysis/Autoclave	Advanced thermal treatment technologies are methods of breaking down waste using heat, to produce heat and power. Gasification uses a little oxygen to break the waste down whereas pyrolysis does not use any oxygen. Such methods give more control over the process and reduce emissions. Autoclaving involves 'cooking' the waste with steam to separate materials to produce recyclables and fuel.	Industrial type buildings, normally with a low chimney.
Materials Recovery Facility (MRF)	A facility that sorts recyclable material collected from households or businesses into separate materials. The materials are then sent for reprocessing into useful materials or products.	Consists of mechanical sorting equipment and conveyor belts. Normally housed inside a warehouse type building.
Mechanical Biological Treatment (MBT)	MBT is generally used to treat residual waste biologically and mechanically. This separates the materials suitable for recycling from an organic fraction which may be used as a fuel or can be composted.	Generally housed inside warehouse type buildings.
Recycling and Reuse Centre (RRC)	Site for the public to take recyclable and general waste to. The sites normally consist of skips and containers for a wide range of different materials, encouraging recycling.	Open facilities with accessible waste containers.

Appendix 5: Borough Waste Arisings and Apportionments

Waste arising figures –London Plan (2011)

Borough	2011		2016		2021		2026		2031	
	MSW	C&I	MSW	C&I	MSW	C&I	MSW	C&I	MSW	C&I
Brent	136	202	143	200	149	199	156	196	161	194
Ealing	158	232	164	219	170	211	176	209	181	207
Harrow	120	143	123	139	126	136	129	134	131	133
Hillingdon	152	336	157	335	162	338	167	341	171	348
Hounslow	132	231	136	223	140	215	144	212	147	211
Richmond	100	143	103	142	105	141	107	141	109	143
Totals	798	1,287	826	1,258	852	1240	879	1,233	900	1,236

All figures are in a 1000 tonnes. MSW = Municipal Solid Waste C&I = Commercial and Industrial Waste

Waste apportionment figures –London Plan (2011)

Borough	2011		2016		2021		2026		2031	
	MSW	C&I	MSW	C&I	MSW	C&I	MSW	C&I	MSW	C&I
Brent	90	160	109	174	130	190	152	207	175	225
Ealing	114	202	138	221	165	241	193	262	221	286
Harrow	57	101	69	110	82	120	96	131	111	143
Hillingdon	96	170	116	186	139	202	162	220	186	240
Hounslow	92	165	112	179	134	195	157	213	180	232
Richmond	56	100	68	109	81	119	95	129	109	141
Totals	505	898	612	979	731	1067	855	1162	982	1267

All figures are in a 1000 tonnes. MSW = Municipal Solid Waste C&I = Commercial and Industrial Waste

Appendix 6: Descriptions of Allocated Sites

Descriptions of each site allocated in the WLWP are provided below. The descriptions bring together information collected as part of the process of selecting these sites as well as that received during stages of consultation on the Plan.

General Information

Suitable waste management technologies

It is considered that the sites would be likely able to accommodate most non-landfill waste management technologies. Environment Agency permitting rules do not allow certain activities to operate within certain distances of a sensitive receptor, which includes a dwelling or workplace, under a standard permit.

Land Contamination

Each allocated site is located on previously developed land but no investigation has been carried out to establish whether the ground itself is contaminated³⁴. Redevelopment of the sites might therefore require work to decontaminate the sites.

Setting Back from Rivers

Where a site is adjacent to a river the Environment Agency has advised that a setback of a minimum of 8 metres from the top of the bank be incorporated into any redevelopment proposals. Setting back development from watercourses and providing an undeveloped buffer zone free from built structures is important for maintaining access to the river, to allow the riparian landowner access for routine maintenance activities and for the Environment Agency to carry out Flood Defence duties. It is also important that a sufficient wildlife and riverside corridor should be maintained to minimise the potential adverse impacts to the water quality and riverine habitats. This will provide opportunities for flood risk management in line with the Environment Agency Catchment Flood Management Plans. Opportunities for river restoration through the redevelopment of sites should also be encouraged which will also ensure compliance with requirements under the Water Framework Directive.

Air Quality Management Areas

All sites are located within Local Authority Air Quality Management Areas.

Waste Input tonnages

The input tonnages provided are taken from records provided by the Environment Agency Waste Data Interrogator for waste inputs for 2011. This information is only supplied for sites that hold an environmental permit and received waste during the course of that year.

³⁴ In all cases, in light of current and previous uses it is possible that the sites might be classified as 'contaminated land' under the Environment Act 1995.

Site Name	Twickenham Depot		
Site Ref. No.	342		
Locational Information			
Borough	Richmond Upon Thames	Site Area (hectares)	2.67
Easting	TQ 15163	Northing	73590
Site Address	Twickenham Central Depot, Langhorn Drive, Twickenham Middlesex, TW2 7SG		
Site Location	To the north is the Harlequins Rugby ground (The Stoop). The land immediately abutting the northern edge of the Depot is an open tarmacked area (used for a hospitality marquee by Harlequins Rugby stadium on match days). To the North East is a 4 storey residential block fronting Langhorn Drive. To the east is public open space including a children's playground. To the south is a railway line and across the railway line is open space. To the west is the Duke of Northumberland's River (a branch of the River Crane) beyond which is a residential area (Conservation Area).		
Neighbouring Uses (within 250 metres)	The site is immediately adjacent to the Harlequins Rugby ground and stadium. A block of 4 storey residential apartments is located along Langhorn Drive to the north, and Richmond upon Thames College lies to the north east. A playing field with children's playground is located to the east. Allotments are just to the south of the railway line. To the west of the site, a residential area of detached houses is located on the opposite bank of the Duke of Northumberland's River (branch of the River Crane).		

Planning Status	<p>The Depot site has been, amongst other things, used for the following purposes for in excess of 10 years:</p> <ul style="list-style-type: none"> • Facilities for the parking of refuse and recycling vehicles • Material Recovery Facility and bulking facilities to support municipal recycling services.
Allocation in Borough Local Plan	<p>The site is identified as a Proposals site in the London Borough of Richmond Site Allocations Plan for Council Depot facilities and continued waste management (TW 9). "To improve and rationalise the Council's existing depot facilities, and repositioning, intensification and improvement of the waste and recycling facilities." The adjacent Harlequins Site (TW8) and the Richmond upon Thames College site (TW10) are also identified.</p>
Current Use	<p>Civic Depot hosting contractors for LB Richmond and some DSO staff and services, including a number of waste related operations. Waste related use includes bulking of: source separated and partially commingled kerbside collected recyclables, arboriculture wood/ green wastes, street cleansing waste and construction and demolition waste from pavement repairs. There are many buildings on site including prefabricated offices, a Victorian brick building, bulking bays, workshops and covered vehicle storage. There is a two storey detached house (owned by LB Richmond and occupied by former employees) located immediately adjacent to the boundary at the south of the site.</p>
Current Vehicle Movements	<p>The site is currently accessed by employee's private vehicles and light vans and HGVs of various sizes.</p>
Current Waste Inputs	<p>This site was recently permitted (May 2013) but contractors operate under exemptions. Input tonnage not counted in existing capacity.</p>
Nominal potential throughput (tpa) (based on 65,000 per hectare)	<p>173,550 tpa.</p>
Environmental Considerations	
Access/Highway	<p>Primary access to the site is from the A316 along Langhorn Drive which is also used for access to Harlequins Rugby Club, Richmond College and residential properties. Access may also be gained from Craneford Way through a controlled gate.</p>
CCHP Potential	<p>The Site Allocations Plan identifies the Harlequins Site and the Richmond upon Thames College site as proposals sites which will have significant power requirements. A part of the site may be used for ancillary educational facilities or limited residential development and this might provide a heat load opportunity.</p>

Archaeology/Historic Interest	There is a disused Victorian pump house in the middle of the site. This building is designated as a Building of Townscape Merit which would need to be retained, potentially constraining development. Lies within the Crane Valley Archaeological Priority Area.
Ecology/HRA	The site is greater than 1km from any internationally/nationally designated site. However parts of the Crane Valley are identified as a Local Site of Nature Conservation Importance.
Flood Risk/Water Protection	The site is not located within a Flood Zone. But as the site is greater than 1ha, a flood risk assessment that focuses on the management of surface water run-off will be required for any re-development.
Green Belt/MOL	The site is not in or near Green Belt. There is MOL (Metropolitan Open Land) to the south and east of the site and along the Duke of Northumberland's River to the west.
Landscape/Visual Impact	<p>Existing buildings on the site range between 2 and 6 metres high. Apart from a small raised area in the middle of the site, the site is level with the surrounding area. There is a mixture of buildings, fencing and trees which offer partial or full screening of the site from all directions.</p> <p>Views of the site from the north would be from the Harlequins Rugby stadium, and a new 4 storey block of residential apartments on Langhorn Drive, and across open ground from Richmond College.</p> <p>Views of the site from the east can be gained across the open space and the access from Craneford Way. This may be obscured if the additional land on the eastern portion of the site were to be developed.</p> <p>Views of the site from the south would be screened by trees on the boundary and the undeveloped land south of the railway line designated as Public Open Space.</p> <p>Views of the site from the west would be partially screened by the vegetation and trees along the site boundary adjacent to the river.</p>
Public Rights of Way (PRoW)	<p>There are no PRoW crossing the site.</p> <p>The site is bounded by public footpaths including the River Crane path that provides pedestrian access to the Harlequins Stadium.</p>
Key Development Criteria	
Archaeology	Proposals should be supported by a desk-based assessment unless agreed with English Heritage

Flood Risk/Water Protection	<p>Redevelopment of this site is likely to require a Stage 2 Flood Risk Assessment. National Planning Practice Guidance advises that waste treatment is compatible with Floodzone 3a. Although the site is not within a Flood Zone, a flood risk assessment that focuses on the management of surface water run-off will be required.</p> <p>The Environment Agency has advised that a setback of a minimum of 8 metres from the top of the bank of the River Crane - a tributary of the River Thames - should be incorporated into any re-development proposals. Prior written consent will be required from the Environment Agency for any works within 8 metres of the River Crane and the Duke of Northumberland's River; this is irrespective of planning permission.</p>
Access/Highway	<p>Redevelopment of the site would need to pay particular attention to the site access along Langhorn Drive which is shared with the occupiers of residential dwellings and visitors to the rugby stadium (especially on match days). The emerging LB Richmond Site Allocations Plan recognises that any intensification of uses is likely to require the provision of a signalised junction between Langhorn Drive and the A316, subject to TfL approval. Vehicular access from Craneford Way should be kept to a minimum.</p>
Archaeology/Historic Interest	<p>Any new scheme would be required to retain the Victorian pump house; result in improvement and extension of the public open space adjoining the Duke of Northumberland River and the backdrop to the Craneford Way playing fields; and preserve or enhance the character or appearance of the Rosecroft Conservation Area.</p>

Site Name	Quattro Park Royal		
Site Ref. No.	328		
Locational Information			
Borough	Ealing	Site Area (hectares)	0.7
Easting	TQ 20931	Northing	82109
Site Address	Quattro Ltd, Park Royal, Regency Street (off Victoria Road), Park Royal NW10 6NR		
Site Location	The site is situated within the Park Royal Industrial Estate situated just off the A4000 (Victoria Road) adjacent to Old Oak Common rail sidings.		
Neighbouring Uses (within 250 metres)	The site adjoins a distribution depot to the north (this includes the handling of foodstuffs), a railway line runs along the eastern and southern boundary on an embankment and to the west is an office block and distribution warehouse. The nearest residential properties are approximately 40 metres away at Wells Road (East) with their gardens as close as 25 metres on the other side of the railway embankment.		
Planning Status	Permanent consent granted in 2001 on appeal for continued use of premises as waste transfer station (ref P/2000/0570).		
Allocation in Borough Local Plan	No		
Current Use	A construction materials distribution, concrete batching and waste bulking depot for excavation waste from utility works. There are two industrial units on site and several portacabins.		
Current Vehicle	The site is currently accessed by HGVs delivering and removing materials and		

Movements	waste to the site plus employees' private vehicles.
Current Waste Inputs	Input tonnage not counted in existing capacity as this is currently utilised for CDEW.
Nominal potential throughput (tpa) (based on 65,000 per hectare)	45,500 tpa
Environmental Considerations	
Access/Highway	The site is accessed from the A4000 (Victoria Road.) Routing is via Victoria Road to the A40, a route carrying industrial estate traffic.
Archaeology/Historic Interest	Acton Wells was a mineral bearing spring discovered in the 17th century but which ceased to be used from the 18th century. No apparent evidence of the spring onsite. The site is less than 500m from local nature reserve Wormwood Scrubs.
CCHP Potential	The site is located in a predominately light industrial area which may offer opportunities for use of space heating generated at the site. In the event that redevelopment associated with HS2 goes ahead there may be opportunities to redevelop adjacent land in a manner that allows for the use of any heat and power generated at this site.
Ecology/HRA	The site is greater than 1km from any internationally/nationally designated site.
Flood Risk/Water Protection	There are no open water bodies in proximity to the site.
Green Belt	The site is not in or near Green Belt.
Landscape/Visual Impact	Existing buildings on the site are around 6 metres high. Views of the site from the north would be obscured by the distribution warehouse. The site currently has 8-10 metre high boundary structures on the eastern boundary which combined with the railway embankment would reduce any potential impacts on the residential properties to the east beyond the railway line. Views of the site from the south would be obscured by a railway embankment. Views of the site from the west would be obscured by the office

	block/warehouse on the adjacent site.
Public Rights of Way	There are no PRow crossing or adjacent to the site.
Key Development Criteria	
Archaeology	Applications involving groundworks should be supported by desk-based assessment, and may require evaluation trenching.
Visual amenity	Careful attention would be needed to avoid adverse impact on sensitive receptors formed by residential area at Wells House Road (East).

Site Name	Twyford Waste Transfer Station		
Site Ref. No.	352		
Locational Information			
Borough	Brent	Site Area (hectares)	1.24
Easting	TQ 19380	Northing	83461
Site Address	Twyford Waste & Recycling Centre, Abbey Road, Brent, NW10 7TJ		
Site Location	The site is located in a predominantly industrial area.		
Neighbouring Uses (within 250 metres)	The Paddington Branch of the Grand Union Canal, which is a navigable waterway, follows the south western boundary of the site divided by a 22 metre wide strip of land owned by the adjacent landowner. There are other industrial properties at varying distances to the north, east, south and west. The nearest residential properties are located 150m to the west of the site boundary beyond the industrial estates.		
Planning Status	The site benefits from a Certificate of Lawfulness for use as a waste transfer station (CLUD 92/1830).		
Allocation in Borough Local Plan	No		
Current Use	Waste Transfer Station (for trade waste, processing site for waste wood from WLWA) and Household Waste Site.		
Current Vehicle Movements	HGVs (including articulated lorries and Rollonoffs) and private vehicles currently deliver waste to the site. Waste is removed by articulated lorries		

	and Rollonoffs.
Current Waste Inputs	<p>Input tonnage counted as 22,714 tpa in existing capacity.</p> <p>Site once operated as a transfer station with an approximate throughput of 125,000tpa.</p> <p>Maximum current capacity is estimated to be 85-90,000tpa.</p>
Nominal potential throughput (tpa) (based on 65,000 per hectare)	57,886 tpa (after deduction of existing capacity contribution)
Environmental Considerations	
Access/Highway	<p>The site has a dedicated 100m access onto Abbey Road near to the junction of the A406 North Circular Road.</p> <p>The Grand Union Canal follows the south western boundary of the site divided from the site by a 22 metre wide strip of land owned by the adjacent landowner.</p>
Archaeology/Historic Interest	Site contains no known archaeological sites.
CCHP Potential	The site is adjacent to other industrial areas which may be able to utilise heat and power generated although no anchor load has been identified.
Ecology/HRA	The site is greater than 1km from any internationally/nationally designated site.
Flood Risk/Water Protection	The Grand Union Canal follows the south western boundary of the site.
Green Belt	The site is not in or near Green Belt
Landscape/Visual Impact	<p>The site is on a number of levels. Existing buildings on the site are no more than 10 metres high at the lower level. There is a 10m high structure on the highest part of the site.</p> <p>Views of the site from the north - across the north circular or Abbey Road are obscured by the old landfill mound.</p> <p>Views of the site from the south are obscured by large warehouse buildings on the adjacent site.</p> <p>Views of the site from the west are across the Grand Union Canal and from the residential area would be across an industrial area with chimney stacks.</p>

Public Rights of Way	There are no PRow crossing or immediately adjacent to the site. The Grand Union Canal Walk runs along the opposite side of the Grand Union Canal with views into the site.
Key Development Criteria	
Flood Risk	The site is greater than 1ha and so a flood risk assessment that focuses on the management of surface water run-off will be required.
Neighbouring Land Uses	Proposals should carefully consider existing and proposed neighbouring land uses and ensure that any development will not result in any significant adverse impact on these uses. In particular, such impacts will include those which might arise from the construction and operation of the site and the movement of vehicles associated with any proposal.

Site Name	Veolia/Brent Transfer Station, Marsh Road		
Site Ref. No.	1261		
Locational Information			
Borough	Brent	Site Area (hectares)	2.71
Easting	TQ 17784	Northing	83085
Site address	Veolia Waste Transfer Station, Marsh Road, Wembley, HA0 1ES		
Site Location	This site is located in the Alperton Lane Industrial Estate and borders the River Brent, a railway line, Alperton Lane, a scrap yard and another waste facility.		
Neighbouring Uses (within 250 metres)	There is housing 170 metres to the north west of the site across Alperton Lane and 130 metres to the south. There are sports fields on the other side of Alperton Lane. A railway line runs past the southern corner of the site. The site is above the River Brent which runs adjacent to the south eastern boundary. There are industrial areas immediately to the west and east of the site.		
Planning Status	94/1413 Erection of single detached building in connection with the use of the site as a waste transfer station.		
Allocation in Borough Local Plan	Site is a designated site in the 'saved' Brent UDP as a 'Waste Management Manufacturing Area'.		
Current Use	Permitted Waste Transfer Station plus Vehicle Depot for Veolia refuse vehicle fleet serving Westminster & Camden collection contracts and salt store serving Westminster, Camden and Brent. There are existing, large waste transfer station buildings on site, and open hard stand areas for storage and vehicle depot facilities. Existing building heights are approximately 10-18 metres.		

Current Vehicle Movements	Waste is delivered to the site in refuse vehicles and removed in articulated HGVs.
Current Waste Inputs	Input tonnage 82,691 tpa counted in existing capacity.
Nominal potential throughput (tpa) (based on 65,000 per hectare)	93,459 tpa (after deduction of existing capacity contribution)
Environmental Considerations	
Access/Highway	<p>The site is close to strategic roads A4005, A40 and A406. The site is currently accessed from the A4005 from Alperton Lane and then along Marsh Road which runs through an industrial estate including another waste transfer station. The site has in the past been accessed directly from Alperton Lane.</p> <p>The River Brent runs along the southern boundary of the site, being a small tributary running from Brent Reservoir to the River Thames at Brentford.</p>
Archaeology/Historic Interest	No internationally or nationally designated site present. There is potential for palaeo – environmental remains alongside the River Brent.
CCHP Potential	The site is adjacent to other industrial areas which may be able to utilise heat and power generated.
Ecology/HRA	Site is within 250m of a SINC designated in the Ealing Local Plan which is of Grade 1 Borough Importance. It forms part of the much larger 'Brent River Park: Hanger Lane to Greenford Line' SINC (site 15/EaBI14A).
Flood Risk/Water Protection	Southern boundary is adjacent to the River Brent
Green Belt	The site is not in or near Green Belt
Landscape/Visual Impact	<p>The site is level with the surrounding area. Existing buildings on the site are between 10 and 18 metres high which is in keeping with heights of buildings on adjacent land.</p> <p>Distant views from the north would be across the open Alperton Sports Ground.</p> <p>Views from the east would be from Marsh Lane and would be obscured by light industrial units.</p> <p>Views from the south would be from low and high rise office space with views from the residential area obscured by the railway embankment.</p>

Public Rights of Way	The pedestrian pavement of Alperton Lane runs adjacent to the site's northern boundary.
Key Development Criteria	
Archaeology	Proposals should be supported by a desk-based assessment unless agreed with English Heritage.
Flood Risk/Water Protection	The site is greater than 1ha and so a flood risk assessment that focuses on the management of surface water run-off will be required. The Environment Agency advises a setback of a minimum of 8 metres from the top of the bank of the River Brent must be incorporated into re-development proposals. The site boundary is itself over 8 metres from the bank.
Visual amenity	Careful attention would be needed to avoid adverse impact on sensitive receptors including the sports fields to the north of the site.
Access	Any redevelopment would need to pay particular attention to impacts on Marsh Lane which can be constricted due to vehicles parking on this highway.

Site Name	Greenford Reuse & Recycling Site & Greenford Depot, Greenford Road		
Site Ref. No.	309 & 310		
Locational Information			
Borough	Ealing	Site Area (hectares)	1.78
Easting	TQ 14334	Northing	81848
Site Address	Greenford Road Reuse and Recycling Centre & Greenford Depot, Greenford Road, Middlesex, UB6 9AP		
Site Location	The site is adjacent to the Greenford Bus Depot and near to Brent River Park.		
Neighbouring Uses (within 250 metres)	There is a bus depot adjacent to the northern boundary of the site. The River Brent runs along the south-eastern boundary. Beyond the river is Brent River Park Metropolitan Open Land (MOL). There are residential properties to the west (separated from the site by a large bus maintenance garage) and also a school to the north of site.		
Planning Status	Consent granted in 1973 for waste use. More recent consents have however been granted. These include: P/2000/4510 (completed 2004) - The erection of building for paper and leather storage and two additional bays for storage of paper and glass for recycling. P/2005/2560 (completed 2006) - The installation of a new organic waste recycling facility enclosure.		
Site Identified in Borough Local Plan?	Redevelopment of Greenford Depot is covered by policy 4.3 of Ealing Development (Core) Strategy.		
Current Use	Part of the site is a raised split level household waste recycling centre, located in the north-eastern corner. The recycling centre includes a three-sided covered tipping and bulking area (10 metres high from site level 15 metres from ground level) and the remainder of the site is open. Commercial waste may also be tipped at the re-use and recycling centre.		

	<p>The adjacent depot site incorporates various Ealing Council services including the Ealing Council highways services, street cleansing, grounds maintenance and refuse vehicle depot. The majority of the allocated depot site is used for open storage of refuse vehicles. There are two waste/recycling bulking areas: a small open one and a larger enclosed area. Baling of recyclable materials takes place on the depot site. Building heights range from approx. 3-8 metres.</p>
Current Vehicle Movements	<p>At peak periods approximately 600 vehicles deliver waste to the re-use and recycling centre which can cause vehicles to queue back to, and onto, the main highway. Approximately 30% of the waste deliveries is from commercial sources including transit vans and small lorries. These movements are additional to those associated with the depot including the waste use.</p>
Current Waste Inputs	<p>The re-use and recycling and recycling centre handles approximately 15,000 tonnes of waste per annum.</p> <p>The depot receives source segregated and comingled recyclables from recycling rounds. In total approximately 30,000 tonnes per annum of food waste and bulky waste is also brought into the depot.</p> <p>Combined input tonnage 35,610 tpa is counted in existing capacity.</p>
Nominal potential throughput (tpa) (based on 65,000 per hectare)	<p>80,285 tpa (after deduction of existing capacity contribution)</p>
Environmental Considerations	
Access/Highway	<p>The nearest strategic road (A40) is over a mile away to the north with access via Greenford Road (a busy thoroughfare). The Depot and Re-use and Recycling Centre have separate entrances onto the shared access road which are adjacent to each other. The access onto the highway is shared with the bus depot to the north of the site. The entrances are lower than the main highway.</p>
Archaeology	<p>The site is located within the Brent River Valley Archaeological Interest Area as defined in Ealing Local Plan with some potential for palaeo- environmental remains but largely former landfill.</p>
CCHP Potential	<p>There are industrial areas adjacent to the site.</p>
Ecology/HRA	<p>The site is greater than 1km from any internationally/nationally designated site.</p>

Flood Risk/Water Protection	Site within Flood Zone 2
Green Belt	The site is not in or near Green Belt.
Landscape/Visual Impact	There are sensitive receptors in proximity to the site in the form of residential areas and the River Brent Park. Current noise impact has been mitigated by erection of an acoustic barrier along north eastern boundary to the rear of bays.
Public Rights of Way	A PRoW runs alongside the River Brent on the opposite bank but diverts away before it passes the main body of the depot.
Key Development Criteria	
Archaeology	Proposals should be supported by a desk-based assessment unless agreed with English Heritage
Flood Risk/ Water Protection	A setback of a minimum of 8 metres from the top of the bank of the River Brent must be incorporated into re-development proposals. The site is greater than 1ha and so a flood risk assessment that focuses on the management of surface water run-off will be required.
Visual and amenity impact	Redevelopment of the site would need to consider views of the site from the River Brent Park in particular. Policy 7D of Ealing Development Management DPD expects a buffer strip to be provided around existing or proposed open spaces. The depth of the buffer is to be determined having regard to the particular circumstances of the site and the open space, but would typically be in the region of 5-10m (see para. E7.D.5). Policy 2.18 of the same document is also relevant as regards views to and from open space. In addition impact on residential uses including noise would need to be mitigated.
Highways	Any redevelopment should seek to mitigate the current congestion on the highway which occurs at peak times.

Site Name	Council Depot, Forward Drive		
Site Ref. No.	222		
Locational Information			
Borough	Harrow	Site Area (hectares)	1.83 ³⁵
Easting	TQ 15830	Northing	89266
	Harrow Council Depot, Forward Drive, Harrow, .HA3 8NT		
Site Location	The site is located directly adjacent to the Forward Drive Civic Amenity (CA) Site.		
Neighbouring Uses (within 250 metres)	A residential area of two storey dwellings lies immediately to the north of the site. To the east there is a religious temple and a school across Kenmore Avenue. To the south is a railway line which runs on an embankment above the level of the site. Beyond the railway line are prominent industrial units.		
Planning Status	Various permissions depending on Unit No and inclusion of adjacent CA site. Secure Parking Area On Site Of Garages & Loading Platform With Fencing & Lighting EAST/477/01/LA3 Granted 09/07/2001. (Unit 1). Change Of Use: Warehouse Storage To Training Facility And Alterations Including: Fire Escape Canopy Disabled Ramps Bin Enclosure & New Pedestrian Access To Kenmore Avenue (unit 4) Granted 11/02/2005.		

³⁵ This represents the portion of the depot site which may be redeveloped with the CA/WTS site immediately to the west.

Allocation in Borough Local Plan	Allocated for waste management and depot functions.
Current Use	The site comprises a current council works depot and base for other Harrow Council services. The site has a mixture of vehicle workshops, open hard stand areas, car parking, office blocks and other buildings varying in size and construction.
Current Vehicle Movements	The site is very busy and there is a range of HGVs entering the site as well as school buses and private vehicles. At peak periods vehicles visiting the adjacent household waste recycling site queue back to the main road which hinders access to the depot.
Current Waste Inputs	The Depot site has a registered exemption which recognises existing limited waste inputs. The household waste site and WTS component input tonnage of 25,780 tpa is already counted toward the apportionment so is discounted from overall capacity contribution.
Nominal potential throughput (tpa) (based on 65,000 per hectare)	124,370tpa
Environmental Considerations	
Access/Highway	The nearest strategic road is the A409 with the routing via residential/commercial areas. Emergency access is from Kenmore Avenue.
Archaeology/Historic Interest	No internationally or nationally designated site present.
CCHP Potential	There are industrial areas adjacent to the site.
Ecology/HRA	The site is greater than 1km from any internationally/nationally designated site.
Flood Risk/Water Protection	There are no open water bodies in proximity to the site.
Green Belt	The site is not in or near Green Belt.
Landscape/Visual Impact	The site is generally well screened. Acoustic screening has been erected between the residential area in the north and the adjacent CA site. This screening does not currently extend along the northern boundary of the

	depot where normal fencing is in place.
Public Rights of Way	There are no PRow crossing or immediately adjacent to the site.
Key Development Criteria	
Local amenity	Development of a waste facility on site would need to result in an overall improvement to the existing levels of amenity (noise, odour and dust emissions) experienced by neighbouring uses, especially the residential area to the north of the site, through enclosing any new facility, as well as the existing civic amenity facility.
Access	Redevelopment of the site would need to take into account the cumulative congestion created by vehicles entering the depot and the adjacent household waste recycling site. Proposals would need to provide for adequate circulation arrangements within the site. There is scope for one way routing to be established on approach roads for HGVs.

Site Name	Western International Market		
Site Ref. No.	2861		
Locational Information			
Borough	Hounslow	Site Area (hectares)	3.2
Easting	TQ 5109	Northing	1785
Site Address	Western International Market, Southall, UB2 5XH		
Site Location	Site is located in an industrial area to the northeast of Junction 3 of the M4 motorway. The site is located to the south of Hayes Road and to the west of Southall Lane. To the north of Hayes Road is Bulls Bridge Industrial Estate.		
Neighbouring Uses (within 250 metres)	There is a raised soil embankment on the southern site boundary and no buildings currently overlooking the site. The land to the west has been developed in association with the redevelopment of Western International Market which sells food and horticultural produce, open land to south, and industrial/retail areas to the east and north with the most proximal uses being Costco and a data centre. The M4 is audible from the site.		
Planning Status	In March 2006, planning permission was granted subject to a legal agreement which provided for the demolition of buildings on the site and development of a wholesale horticultural market with offices, food wholesale facilities, loading bays, storage areas, associated buildings, ancillary facilities and surface car parking to the west of the site. This included the provision of a public weekend market and development of an employment building (B1, B2, and B8 uses) with associated car parking, loading and access (Ref No: 01032/E/25).		
Allocation in Borough Local Plan	No		

Current Use	The large site comprises land which is level and undeveloped. The international market has been demolished, so the site is clear of any buildings or other structures.
Current Vehicle Movements	None
Current Waste Inputs	None
Nominal potential throughput (tpa) (based on 65,000 per hectare)	208,000 tpa
Environmental Considerations	
Access/Highway	The site has very good access to strategic roads A312 and M4 via Hayes Road which is primary road.
Archaeology/Historic Interest	Major prehistoric/Saxon site excavated to northwest. The Brentford Fountain Western International Market - a Grade II Listed Monument is adjacent to the site.
CCHP Potential	There are industrial areas adjacent to the site.
Ecology/HRA	The site is greater than 1km from any internationally/nationally designated site.
Flood Risk/Water Protection	There are no open water bodies in proximity to the site.
Green Belt	The Site is adjacent to Green Belt
Landscape/Visual Impact	The site is in an industrial/retail setting and so there are few sensitive receptors. There is at least one gas holder in the vicinity of the site that forms a prominent landmark and draws the eye when viewing the site from the south.
Public Rights of Way	There are no PRow crossing or immediately adjacent to the site.
Key Development Criteria	
Archaeology	Applications involving groundworks should be supported by desk-based assessment, and likely to require evaluation trenching.

Flood Risk/Water Protection	The site is greater than 1ha and so a flood risk assessment that focuses on the management of surface water run-off will be required.
Visual amenity	Some screening of the site would be required depending on the nature and scale of any development. Particular attention would need to be paid to building siting, materials, height, design and landscaping so as to be sympathetic to the adjacent Green Belt.
Neighbouring Land Uses	Proposals should carefully consider existing and proposed neighbouring land uses and ensure that any development will not result in any significant adverse impact on these uses. In particular, such impacts, including those on air quality, will include those which might arise from the construction and operation of the site and the movement of vehicles associated with any proposal.

Site Name	Rigby Lane Waste Transfer Station		
Site Ref. No.	331		
Locational Information			
Borough	Hillingdon	Site Area (hectares)	0.91
Easting	TQ 082	Northing	798
Site Address	SITA UK Ltd, 1 Rigby Lane, Hayes, Middlesex, UB3 1ET		
Site Location	The site is located within an established industrial estate approximately 1.3 kilometres south west of Hayes town centre, 1.3 kilometres north of the M4 Motorway and south of the Grand Union Canal.		
Neighbouring Uses (within 250 metres)	The site is surrounded immediately to the north, east and west by commercial/industrial units. To the south it adjoins an elevated section of land occupied by Crossrail and the existing railway. To the north of the site is the Grand Union Canal. The nearest residential housing is approximately 70m away beyond the railway embankment. The northern boundary of the site faces onto the main access road (Rigby Lane) to the industrial estate. Across the road is an industrial unit and beyond that a band of trees shields the Grand Union Canal from view. The surrounding building heights vary greatly between 3-35m high with a concrete batching plant circa 15m high in view from the site.		
Planning Status	Planning permission exists for waste management comprising a Waste Transfer Station and overnight parking for goods vehicles. The existing permission also consents operation of a Civic Amenity Site (CA) in the north-western corner of the site, although this has not been implemented.		

Allocated in Borough Local Plan	No
Current Use	The site currently operates as a waste management facility comprising a Waste Transfer Station (WTS). The Transfer Station building is approximately 8 metres in height. There is also an office building and weighbridge on site. The site has been operating as a waste facility for over two decades and did until 2008 operate a dual facility including a CA site for members of the public.
Current Vehicle Movements	The site is accessed by HGVs and employee's private vehicles. N.B. There is no planning condition that limits the number of vehicle movements that may be used to deliver waste.
Current Waste Inputs	Input tonnage 25,280 tpa counted in existing capacity. Existing planning condition limiting daily inputs to 1,030 tonnes.
Nominal potential throughput (tpa) (based on 65,000 per hectare)	33,870 tpa (after deduction of existing capacity contribution).
Environmental Considerations	
Access/Highway	Vehicular access to the site is from three priority junctions that connect onto Rigby Lane at the site's north-eastern and north-western boundaries. The north-eastern boundary of the site is currently designed to accommodate vehicular traffic movements associated with the WTS whilst the north-western access combines public access to the consented (as yet unbuilt) CA alongside HGV ingress for permitted CA collections. Egress by HGVs collecting from the CA occurs from the WTS access.
Archaeology/Historic Interest	Lies in vicinity of significant Palaeolithic finds.
CCHP Potential	There are industrial areas adjacent to the site.
Ecology/HRA	The site is greater than 1km from any internationally/nationally designated site.
Flood Risk/Water Protection	There are no open water bodies in proximity to the site. Grand Union Canal across the road & Stockley Road lake is to south west.
Green Belt	The site is near (55m) to Green Belt north of the Grand Union Canal.
Landscape/Visual	The site is not overlooked by sensitive receptors. Tall structures

Impact	including concrete batching plant visible from site.
Public Rights of Way	The pedestrian pavement of Rigby Lane runs alongside the road adjacent to the main access road.
Key Development Criteria	
Archaeology	Proposals should be supported by a desk-based assessment unless agreed with English Heritage
Landscape/Visual Impact	The site falls within a height restriction zone with limits applied.

Appendix 7 - Relationship between WLWP policies and previously adopted policies in Boroughs' DPDs

The following tables show how the policies of the West London Waste Plan have superseded previously adopted policies contained in the six constituent Boroughs' Development Plan Documents.

London Borough of Brent

Superseded Policy in Core Strategy (Adopted 2010)		Replacement West London Waste Plan Policy	
Policy No.	Policy Title	Policy No.	Policy Title
N/A	N/A	N/A	N/A

Brent Unitary Development Plan (UDP), 2004 (Planning Policy Relevant in Brent, June 2011) ³⁶		Replacement West London Waste Plan Policy	
Policy No.	Policy Title	Policy No.	Policy Title
W3	New Waste Management/ Manufacturing Proposals – Environmental and Access Criteria	WLWP 4	Ensuring High Quality Development
W4	Waste Management / Manufacturing Areas	WLWP 3	Location of Waste Development
W5	Safeguarding of Waste Facilities	WLWP 2	Safeguarding and Protection of Existing and Allocated

³⁶ Some of the policies in the Brent UDP (adopted in 2004) still make up part of the development plan for Brent. A Development Management Development Plan Document (DPD) will replace the remaining saved UDP policies once adopted. Consultation took place from 20 June to 31 July 2014. Development will need to be in accordance with the relevant development management policies of the UDP policies and in due course the Development Management DPD.

			Waste Sites
W6	Proposals for Waste Management Facilities outside Waste Management/Manufacturing Areas	WLWP 3	Location of Waste Development
W11	Waste Transfer Facilities/Waste to Landfill	WLWP 4	Ensuring High Quality Development

Superseded Policy in Site Specific Allocations DPD July 2011		Replacement West London Waste Plan Policy	
Policy No.	Policy Title	Policy No.	Policy Title
N/A	N/A	N/A	N/A

London Borough of Ealing

Superseded Policy in Local Plan Core Strategy (Adopted April 2012)		Replacement West London Waste Plan Policy	
Policy No.	Policy Title	Policy No.	Policy Title
1.2 (i)	Delivery of the Vision for Ealing 2026 (clause (i))	WLWP 2	Safeguarding and Protection of Existing and Allocated Waste Sites
		WLWP 3	Location of Waste Development
		WLWP 4	Ensuring High Quality Development
		WLWP 5	Decentralised Energy

		WLWP 6	Sustainable Site Waste Management
		WLWP 7	National Planning Policy Framework: Presumption in Favour of Sustainable Development

London Borough of Harrow

The table below lists the relevant waste policies of the Harrow Unitary Development Plan (2004) that were deleted by the Secretary of State on 28th September 2007 and those deleted upon the adoption of the Harrow Development Management Policies DPD on 4th July 2013.

Policy	Title	Date of Deletion
SEP3	Waste General Principles	28 th September 2007
EP16	Waste Management, Disposal and Recycling	4 th July 2013
EP17	Waste Generating Activities	28 th September 2007
EP18	Landfilling	28 th September 2007
EP19	Aggregates	28 th September 2007
D8	Storage of Waste, Recyclable and Reusable Materials in New Development	28 th September 2007

Superseded Policy in the Harrow Core Strategy (Adopted 16th February 2012)		Replacement West London Waste Plan Policy	
Policy No.	Policy Title	Policy No.	Policy Title
N/A	N/A	N/A	N/A

Superseded Policy in the Harrow Development Management Policies DPD (Adopted 4 th July)		Replacement West London Waste Plan Policy	
Policy No.	Policy Title	Policy No.	Policy Title
N/A	N/A	N/A	N/A

Superseded Policy in the Harrow & Wealdstone Area Action Plan DPD (Adopted 4 th July)		Replacement West London Waste Plan Policy	
Policy No.	Policy Title	Policy No.	Policy Title
N/A	N/A	N/A	N/A

Superseded Policy in the Harrow Site Allocations DPD (Adopted 4 th July)		Replacement West London Waste Plan Policy	
Policy No.	Policy Title	Policy No.	Policy Title
N/A	N/A	N/A	N/A

London Borough of Hillingdon

Superseded Policy in Local Plan Strategic Policies (Adopted November 2012)	Replacement West London Waste Plan Policy
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Policy No.	Policy Title	Policy No.	Policy Title
EM11	Sustainable Waste Management	WLWP 2	Safeguarding and Protection of Existing and Allocated Waste Sites
		WLWP 3	Location of Waste Development
		WLWP 4	Ensuring High Quality Development
		WLWP 5	Decentralised Energy
		WLWP 6	Sustainable Site Waste Management
		WLWP 7	National Planning Policy Framework: Presumption in Favour of Sustainable Development

London Borough of Hounslow

Superseded Policy in Unitary Development Plan (December 2003)		Replacement West London Waste Plan Policy	
Policy No.	Policy Title	Policy No.	Policy Title
ENV-P.2.2	Landfill	WLWP 3	Location of Waste Development
ENV-P.2.1	Waste management	WLWP 6	Sustainable Site Waste Management
ENV-P.2.3	Waste management facilities	WLWP 2	Safeguarding and Protection of Existing and Allocated Waste Sites

London Borough of Richmond

Saved Policy in the Unitary Development Plan (Adopted 2005)		Replacement West London Waste Plan Policy	
Policy No.	Policy Title	Policy No.	Policy Title
CCE22	Waste Collection and Disposal	WLWP 2	Safeguarding and Protection of Existing and Allocated Waste Sites
		WLWP 3	Location of Waste development
		WLWP 4	Ensuring High Quality Development
		WLWP 5	Decentralised Energy
		WLWP 6	Sustainable Site Waste Management
		WLWP 7	National Planning Policy Framework: Presumption in Favour of Sustainable Development

Core Strategy (Adopted 2009)		Replacement West London Waste Plan Policy	
Policy No.	Policy Title	Policy No.	Policy Title
CP6	Waste	WLWP 2	Safeguarding and Protection of Existing and Allocated Waste Sites
		WLWP 3	Location of Waste development

		WLWP 4	Ensuring High Quality Development
		WLWP 5	Decentralised Energy
		WLWP 6	Sustainable Site Waste Management
		WLWP 7	National Planning Policy Framework: Presumption in Favour of Sustainable Development

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Report to the Councils of the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames

by Andrew S Freeman BSc(Hons) DipTP DipEM FRTPI FCIHT MIEEnvSc

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 16th March 2015

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION INTO THE
WEST LONDON WASTE PLAN**

Document submitted for examination on 30 July 2014

Examination hearings held between 7 and 10 October 2014

File Ref: PINS/R5510/429/9

ABBREVIATIONS USED IN REPORT

Examination documents (referenced in parentheses in the text) are prefixed by the letters EB, ED, PMM or SD. Duly-made representations have the prefix SU.

AA	Appropriate Assessment
BREEAM	Building Research Establishment Environmental Assessment Method
CEEQUAL	Civil Engineering Environmental Quality Assessment and Award Scheme
cu	cubic
ha	hectares
LDSs	Local Development Schemes
m	metres
MM	main modification
Para	Paragraph
PPS	Planning Policy Statement
PSED	Public Sector Equality Duty
SA	Sustainability Appraisal
SCIs	Statements of Community Involvement
SCSs	Sustainable Community Strategies
WLWP	West London Waste Plan

Non-Technical Summary

This report concludes that the West London Waste Plan provides an appropriate basis for waste planning in the west London boroughs¹ over the next 17 years providing a number of modifications are made to the Plan. The borough councils have specifically requested me to recommend any modifications necessary to enable the Plan to be adopted. All of the modifications to address this were proposed by the boroughs and I have recommended their inclusion after considering the representations from other parties on these issues.

The principal main modifications can be summarised as follows:

- adding reference to superseded policies;
- recognising updated national policy (National Planning Policy for Waste);
- aligning the Vision and Strategic Objectives with national policy;
- encouraging appropriate provision for construction, demolition and excavation waste and hazardous waste;
- adding a policy on the provision of new waste management capacity;
- ensuring the effectiveness of policies on safeguarding, the location of development, high quality development, decentralised energy and sustainable site waste management;
- correcting details regarding allocated sites;
- adding site descriptions and relevant considerations; and
- introducing monitoring triggers.

¹ The London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames and including also the area administered by the Old Oak and Park Royal Development Corporation (see Footnote 3)

Introduction

1. This report contains my assessment of the West London Waste Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (Paragraph 182) makes clear that, to be sound, a local plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the borough councils have submitted what they consider to be a sound plan. The basis for my examination is the "Proposed submission plan" dating from February 2014 (SD8). This is the document upon which consultation took place between 28 February and 11 April 2014.
3. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with Section 20(7C) of the 2004 Act the borough councils requested that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.
4. The main modifications that are necessary for soundness and legal compliance all relate to matters that were discussed at the examination hearings. Following these discussions, the boroughs prepared a schedule of proposed main modifications (PMM1) and carried out sustainability appraisal (PMM2). These were subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report.
5. In the light of the consultation responses, and as proposed by the boroughs,² I have made some amendments to the detailed wording of the main modifications. None of these amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken.

Assessment of Duty to Co-operate

6. Section 20(5)(c) of the 2004 Act requires that I consider whether the borough councils complied with any duty imposed on them by Section 33A of the 2004 Act in relation to the Plan's preparation. Section 33A requires constructive, active and on-going engagement with local authorities and a variety of prescribed bodies in order to maximise the effectiveness of plan preparation.
7. The way in which the duty to co-operate was met is documented in the report "Statement of Duty to Cooperate" (SD6). In particular, the boroughs:
 - consulted with the duty to co-operate bodies, and other bodies, at various stages of the plan preparation process;

² See PMM7

- were represented at meetings of the London Regional Technical Advisory Board;
- carried out repeat engagement with a large number of waste planning authorities; and
- were represented through regular attendance at meetings of the South East Waste Planning Advisory Group.

The various iterations of the emerging Plan were amended in response to the consultations and discussions.

8. I conclude that the boroughs have collaborated with other authorities and bodies and have co-operated effectively through a continuous period of engagement. The local planning authorities have fulfilled the duty to co-operate with regard to the West London Waste Plan.

Assessment of Legal Compliance

9. My examination of the compliance of the Plan with the legal requirements is summarised in the table below Paragraph 23. I conclude that the Plan meets them all. However, I have comments with regard to Local Development Schemes, the Spatial Development Strategy, superseded policies, inviting representations, Sustainability Appraisal and National Policy.³

Local Development Schemes

10. As stated in the following table, the content and timing of the Plan are compliant with all but the Local Development Scheme for Hillingdon. However, up-to-date information is set out on Hillingdon's Local Plans web page. In addition, readers of the web page are directed to the West London Waste Plan web site which contains full current details of the timescales involved with regard to consultation, submission, examination and adoption. As such, I am satisfied that there is no significant impediment regarding accordance with the local development schemes.

Spatial Development Strategy

11. Given that the West London Waste Plan has been prepared by six London boroughs, regard must be had to the spatial development strategy and the Plan must be in general conformity with that strategy. The spatial development strategy that is in force at the time of the writing of this report is the London Plan (2011). This is the version of the London Plan upon which the West London Waste Plan is predicated. It is the opinion of the Greater London Authority that the West London Waste Plan is in general conformity with the London Plan.⁴

³ Shortly before completion of this report, I was advised of the creation of a Mayoral Development Corporation (Old Oak and Park Royal Development Corporation) which would have planning powers over related parts of the boroughs of Brent and Ealing. Having considered the notes on this matter (ED36 and ED37), I am satisfied there are no significant implications, at present, concerning the preparation and content of the Plan. However, the consequences of the establishment of the Development Corporation will need to be considered by the west London boroughs.

⁴ See the duly-made representation of the Greater London Authority, 14 April 2014 (SU52)

12. In parallel with the examination of the West London Waste Plan there has been an examination in public into Further Alterations to the London Plan. Adoption of the Further Alterations is envisaged in Spring, 2015. Amongst other things, the Further Alterations include revision of the waste arising figures and a change to the apportionment to the west London boroughs. A new Carbon Intensity Floor policy is also proposed.
13. The emerging West London Waste Plan has not been fully assessed for general conformity with the Further Alterations to the London Plan. However, there are not considered to be any potential issues.⁵ Under the Further Alterations, the apportioned amount of waste to be managed in west London would be lower. The Waste Plan would then have identified land in excess of that required to meet the apportionment. Any sites allocated for waste management purposes could be de-allocated in a subsequent revision of the West London Waste Plan.
14. With regard to the proposed introduction of the Carbon Intensity Floor, this may go no further than Policy WLWP 4 in the West London Waste Proposed submission plan but the policy is still in general conformity with the Further Alterations. Also, any development triggering Policy WLWP 4 would likely be referable to the Mayor of London and therefore must also be compliant with the Carbon Intensity Floor policy.

Superseded Policies

15. Regulation 8(5) of the Town and Country Planning (Local Planning) (England) Regulations 2012 states that, where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy. In the case of the West London Waste Plan, there are a large number of policies that would be superseded. However, through an omission, these policies and the replacement policies have not been identified. This matter would be corrected under main modifications **MM1A and MM25**.

Inviting Representations

16. Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out requirements with regard to the notification of prescribed persons and bodies in the preparation of a local plan and invitations to make representations. At the examination hearings, it was argued that adjoining land owners should have been directly notified; also that, where there was a potential impact on a particular business, notification should certainly have taken place.
17. For my part, I find that there has been no failure to comply with the Regulations. They require the boroughs to invite representations from such residents and other persons carrying on business in the area *as they consider appropriate*.⁶ Further, in the particular case at issue, the e-mail trail demonstrates consultation with agents of the business throughout plan preparation. Bearing in mind also that the representor had an opportunity to

⁵ See ED34; also ED35

⁶ Regulation 18(2)(c)

make statements to and participate in the examination hearings, there has been no related failing on the part of the boroughs.

Sustainability Appraisal

18. The relevant Sustainability Appraisal is set out in the document "Proposed submission plan - Sustainability appraisal: pre-submission version" (SD9). This has been criticised for reasons that include:
- a failure to properly consider negative effects on adjoining land uses and Green Belt issues;
 - a failure to consider alternative sites; and
 - a failure to make provision for waste development in a sustainable way.
19. For my part, I consider it sensible to concentrate on the sites that are deemed to be appropriate and reasonable. Deliverable sites are appraised in Section 6 of the Appraisal with an assessment against 27 headings. I would not expect any general assessment against Green Belt matters bearing in mind that Green Belt sites were excluded at the site selection stage. However, the inclusion of relevant comments would have been informative where, for example, there were issues concerning adjacent Green Belt. With regard to negative effects on adjoining business land uses, I was told that these could be recorded against "Local Employment".
20. The "failure" to make provision for waste development in a sustainable way essentially refers to a concern that alternative sites for anaerobic digestion and the production of energy have not received adequate attention. However, as discussed below, I consider that the allocated sites could accommodate an adequate range of waste management developments.
21. I appreciate that, in the light of current knowledge, it would have been helpful to record in particular the presence of sensitive land uses where adjacent to sites proposed for allocation. However, I do not find that the conclusions of the boroughs are significantly flawed. The sustainability appraisal is part of an overall assessment of the environmental effects of the West London Waste Plan. Even if some of the comments were varied to reflect up-to-date circumstances, I do not consider that the conclusions of the exercise would be materially different. I conclude that the sustainability appraisal is adequate.

National Policy

22. Shortly after the final adjournment of the examination hearings, the Government published replacement planning policy on waste.⁷ At the same time, updated guidance was added to Planning Practice Guidance. The West London boroughs subsequently produced a Statement of Consistency on the matter (PMM5). The consultation version of the emerging policy⁸ was before the hearings and was referred to as appropriate. However, views on the new

⁷ National Planning Policy for Waste, Department for Communities and Local Government, October 2014

⁸ Updated national waste planning policy: Planning for sustainable waste management, Consultation, Department for Communities and Local Government, July 2013

documents were invited as part of the consultation on the proposed main modifications. I have had regard to the responses in writing this report.

23. Under the heading of National Policy, the Plan makes reference to the former Planning Policy Statement 10. The updated national policy would be recognised through main modification **MM1BB**.

LEGAL REQUIREMENTS	
Local Development Schemes (LDSs)	The Local Plan is identified within the approved LDSs of the various London Borough Councils (EB7 to EB12). The LDSs date from between April 2009 and March 2014. The Hillingdon scheme (EB10) sets out an expected adoption date of February 2012. All the other schemes show an expected adoption date of Spring or Summer 2015. The Local Plan's content and timing are compliant with all but the Hillingdon Local Development Scheme (see above).
Statements of Community Involvement (SCIs) and relevant regulations	The SCIs (EB1 to EB6) were adopted between June 2006 and June 2013. Consultation has been compliant with the requirements therein including consultation on the post-submission proposed "main modification" changes (MM).
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitat (sic) Regulations Appropriate Assessment Screening Report December 2010 including 2014 update (SD11) sets out why AA is not necessary.
National Policy	The Local Plan complies with national policy except where indicated and modifications are recommended.
Spatial Development Strategy	The Local Plan has regard to and is in general conformity with the Spatial Development Strategy (London Plan (2011)).
Sustainable Community Strategies (SCSs)	Satisfactory regard has been paid to the SCSs.
Public Sector Equality Duty (PSED)	The Local Plan complies with the Duty and is adequate.
2004 Act (as amended) and 2012 Regulations.	The Local Plan complies with the Act and the Regulations except where indicated and modifications are recommended.

Assessment of Soundness

Preamble

24. The West London Waste Plan (SD8) is intended to provide the policy framework for decisions by the west London boroughs on waste matters over the period to 2031. In this regard, the Plan:

- details the estimated amounts of the different types of waste that will be produced in west London over the Plan period;
 - identifies and protects sites that currently deal with waste;
 - identifies the shortfall of facilities that will be needed over the life of the Plan; and
 - allocates sites that it is envisaged will meet the shortfall.
25. One of the key tasks is to meet the apportionment set out in the London Plan (2011). As such, over the plan period, there is a need for about 614,000 tonnes of additional annual capacity in the municipal solid waste and commercial and industrial waste categories.
26. The sites allocated in the Proposed submission plan include what are stated to be seven existing waste sites. Here it is envisaged that substantial new capacity would be generated through part or complete redevelopment. In addition, there are two sites (not existing waste sites) that are allocated for waste development.
27. In considering the soundness of the Plan, I have had regard to Government policy and guidance. This includes the National Planning Policy Framework, National Planning Policy for Waste and the Waste Management Plan for England. In addition, certain provisions of the Waste Framework Directive⁹ are relevant. Article 34 of the Directive concerns inspections. This has been implemented in Part 6 of the Waste (England and Wales) Regulations 2011. However, specific reference would be included within the West London Waste Plan under main modification **MM21B**.
28. Specific waste policies are set out in the document National Planning Policy for Waste rather than in the National Planning Policy Framework. However, other policies in the Framework are relevant to the content of local plans. In particular, when testing soundness, it is necessary to consider whether the Plan has been "positively prepared".
29. For my part, I find that the West London Waste Plan has been positively prepared. An assessment of waste arisings in West London has been undertaken and the results are set out in the Data Compendium report (EB59). This report has been taken into account in formulating the approach to the future management of waste in West London as well as the management of imports.
30. Section 4 of the Plan specifically considers how much waste will need to be managed in west London and how much capacity will be needed. In response to this information, the Plan sets out a strategy of safeguarding existing sites and specifically allocating sites for waste management purposes thus providing the capacity that will be needed to meet the London Plan (2011) apportionment.
31. A presumption in favour of sustainable development is set out in WLWP Policy 6 of the Plan. This confirms that the boroughs will take a positive

⁹ Directive 2008/98/EC on waste and repealing certain Directives

approach in considering waste management proposals. Planning applications that accord with the Plan will be approved unless material considerations indicate otherwise. However, WLWP Policy 2 is couched in negative terms. To ensure that the Plan has been positively prepared in all respects, and to be consistent with national policy, main modification **MM5D (part)** is recommended.

Main Issues

32. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified six main issues upon which the soundness of the Plan depends.

Issue 1 – Whether the Plan sets out a positive and collective vision for the sustainable management of waste within the area

33. Chapter 2 of the Plan includes a Vision of how enough provision for waste management facilities will have been made by 2031. The Vision is supported by a number of Strategic Objectives. The Vision and Strategic Objectives have been prepared in the context of national policy and guidance on waste management.

34. I would expect the Vision to set out matters that are of fundamental importance to waste planning in west London. However, the Vision is lacking in a number of respects:

- The Vision refers to 2031 as the date by which sufficient provision will have been made. However, provision should be a continuous and on-going process with facilities being provided in a progressive manner. "Over the period to 2031" should be referred to as the appropriate timeframe.
- There is no reference to making provision "of the right type". However, the need for a mix of types of facilities is emphasised in national policy.
- There is an absence of any reference to the waste hierarchy. Driving waste management up the waste hierarchy is a fundamental plank of waste management planning.
- There is no indication as to whether the boroughs are aiming to achieve net self-sufficiency of provision within the Plan area. As such, the geographic context of the Plan is unclear.
- It would be appropriate to refer to meeting the needs of local communities as part of the Vision.

35. These matters would be addressed under main modification **MM1C**. In this way, the Vision would be aligned with national policy.

36. In terms of the Strategic Objectives, Objective 1 deals with the identification of land sufficient to meet the apportionment set in the London Plan (2011). However, in line with the Vision as proposed to be modified, it should be made clear that provision is to be made for the sustainable management of an

amount of waste equivalent to the amount arising within the Plan area. Main modification **MM1D** refers.

37. Strategic Objective 5 indicates that the Plan will support the key aims and objectives of the Sustainable Community Strategies of the respective boroughs. However, there is no further reference to these aims and objectives within the Plan. To address this matter, it is proposed to set out, in the Plan, the pillars of sustainable development which underpin the Sustainable Communities Strategies of the boroughs. This would be dealt with under main modification **MM1B**. There would then be clear measures against which the effectiveness of actions, and of the Plan, could be judged.

Issue 2 - Whether sufficient new waste management capacity of the right type would be provided in the right place and at the right time

Construction, Demolition and Excavation Waste

38. Section 4.4 of the Plan discusses the need for facilities for the treatment of construction, demolition and excavation waste. Attention is drawn to a background paper on arisings, forecasts and targets (EB55). The Plan concludes that the area has sufficient permitted capacity for this waste stream and that city-wide targets with regard to net self-sufficiency are close to being met.
39. There are, in fact, two relevant targets. The London Plan (2011) has a city-wide target of 95% recycling and reuse by 2020. This is the target that is close to being met in west London. However, it is also intended that 80% of that recycling should be met in the form of aggregates. It is not possible to meet this more specific target in the Plan area due to a lack of suitable waste.
40. Nonetheless, encouragement for the increased use of materials suitable for use as substitutes for virgin materials such as recycled aggregates is a matter of national policy. To reflect that policy, and to correct the Plan text on construction, demolition and excavation waste, main modifications **MM1F and MM3B (part)** are recommended.

Hazardous Waste

41. Hazardous waste is one of the types of waste for which waste planning authorities should plan for sustainable management. Section 3.5 of the Plan discusses the existing management of hazardous waste. However, this is lacking in detail. Some of the key facts are that just over 88,000 tonnes of hazardous waste was produced in west London in 2012 of which about 85% was exported. At the same time imports amounted to some 20,000 tonnes. Overall, the Plan area achieved 40% net self-sufficiency.
42. The topic is also one that is addressed in the London Plan (2011). It is noted that the Mayor will prepare a Hazardous Waste Strategy for London¹⁰ and that London as a whole will require more and better waste treatment facilities. Without sustained action there remains the risk of a major shortfall in the capital's capacity. There is a need to continue to identify hazardous waste

¹⁰ The commitment to prepare a strategy has now been removed (Further Alterations to the London Plan, Policy 5.19)

capacity for London although the main requirement is for sites for regional facilities.

43. Under the West London Waste Plan, it is not anticipated that a substantial need for new capacity will arise. There is no necessity for allocations specifically for the development of additional hazardous waste management facilities. Nevertheless, in line with national policy and the Spatial Development Strategy, the Plan should not be unsupportive of hazardous waste proposals. Additional modifications **MM1E, MM1G and MM3B (part)** are proposed in order to address the above matters.

Issue 3 - Whether there are clear and effective policies that will help secure the appropriate and timely provision of waste management facilities in line with the London Plan (2011) and national policy and guidance

New Waste Management Capacity

44. As noted in the preamble to this report, one of the key tasks of the Plan is to meet the apportionment set out in the London Plan (2011). The apportionment covers the municipal solid waste and commercial and industrial waste categories. Over the period to 2031, there is a need for about 614,000 tonnes of additional annual capacity. Of this, 162,000 tonnes would be needed in the period up to 2016. A further 221,000 tonnes would be required in the period 2021 to 2026. A final 231,000 tonnes would be needed post-2026.
45. Although these requirements are identified in the London Plan (2011), and discussed in the supporting text of the West London Waste Plan, the requirements are not expressed as a policy commitment. As such, the effectiveness of the Plan would be undermined. There would be no policy driving provision including provision by key dates.
46. To address these shortcomings, a new policy and supporting text are recommended. The policy would be directed at delivering the necessary minimum amount of additional waste management capacity of the right type and at the right time. The provisions would also recognise that net self-sufficiency, in accordance with the stated apportionment, would not be achieved until 2029. In the circumstances, provision of capacity at a faster rate would be encouraged.
47. The new policy would govern provision in the re-use, recycling and other recovery categories. Provision should be made in accordance with the waste hierarchy and this would need to be addressed and justified as a pre-requisite of the grant of planning permission.
48. The new policy and supporting text would be given effect through main modification **MM3B**. The new policy would also support the provision, in appropriate circumstances, of new facilities for the treatment of construction, demolition and excavation waste, and hazardous waste, as discussed above.

Safeguarding and Protection of Existing and Allocated Waste Sites

49. The safeguarding and protection of existing and allocated waste sites are dealt with in WLWP Policy 1 and the related text. In this regard, a list of all the sites that are in existing waste management use is to be found in Appendix 1 of the Plan. However, the list is incomplete and the Plan is not fully effective. Corrections would be made under main modifications **MM22, MM22A, MM22B and MM23**.
50. There are a number of other matters whereby the effectiveness of the Plan is questionable:
- The spatial extent of the safeguarded existing permitted facilities is not shown. This will need to be identified on the policies maps of the Local Plans of the west London Boroughs.
 - Through the wording of the policy, there is a (false) implication that waste transfer and civic amenity sites are *not* waste management uses.
 - Superfluous terminology is included.
 - The policy should deal with compensatory and equal provision of *capacity* not compensatory and equal provision of *sites*.
 - The status of the Quattro site should be clarified given that it would not be available until 2024.
51. A number of related modifications are recommended. These are main modifications **MM4A, MM4B and MM4C**.

Location of Waste Development

52. The main provisions with regard to the location of waste development are set out in Section 6.2 and WLWP Policy 2 of the Plan. However, the supporting text is ineffective in a number of respects.
53. First, there is inaccurate use of terminology. The Plan needs to refer to waste management development (not use) and waste management capacity (not facilities). Secondly, reference to one of the purposes of the policy needs to be included. This is the circumstances under which development proposed on unallocated sites may come forward. Thirdly, there needs to be identification of matters that will be taken into account in assessments of on-going requirements for capacity to meet the London Plan (2011) apportionment.
54. Turning to the policy itself, a number of main modifications are necessary in order to ensure the effectiveness of the policy and the Plan:
- Deletion of the reference to waste transfer stations and civic amenity sites and thus the implication that they are not existing waste management sites.

- Correction of the reference to development plans to ensure consideration of the development plan as a whole, not just the boroughs' development plans.
- Addition of a footnote defining existing waste management sites.
- Re-phrasing of the proviso regarding suitability of development to state that it is the availability and suitability of existing waste management sites or allocated sites that is the consideration.
- Addition of a footnote on suitability.
- Modification of Clause b to ensure that the policy does not act as a cap on capacity outside the London apportionment.
- Identification in a new appendix of the sustainability objectives referred to in Clause c.
- Clarification of the role of other Plan policies.

55. The supporting text would be modified under main modifications **MM5, MM5A and MM5C**. Main modifications **MM5D, MM5E, MM5F, MM5G, MM5H, MM5I and MM5J** refer to the necessary changes to the policy. The appendix setting out the sustainability objectives would be added under main modification **MM21C**.

Ensuring High Quality Development

56. Paragraph 7 of the National Planning Policy for Waste seeks to ensure that waste management facilities are well-designed and hence contribute positively to the character and quality of the area in which they are located. This aim is reflected in Section 6.3 of the Plan and under WLWP Policy 3. However, a number of modifications are necessary in order to make sure that the Plan is effective in this regard:

- Indicating, by way of a footnote, the surveys, assessments and mitigation measures that would be necessary to address the various potential nuisances referred to in the policy.
- Stating that Design and Access Statements will be required *as appropriate* (clarified by reference to a footnote).
- With regard to the movement of waste by modes other than road, requiring incorporation of provision within the scheme or demonstration that this would not be practicable.
- Correcting the reference to Transport Assessments and including a footnote to indicate when such assessments are likely to be necessary.
- Removing Clause f (climate change adaptation and mitigation). This is covered under Clause g.

- Indicating that the achievement of appropriate BREEAM and CEEQUAL ratings will be as specified in borough development plans.
- Adding footnote reference with regard to BREEAM and CEEQUAL.
- Clarifying the provisions relating to quality of surface and groundwater.
- Clarifying the circumstances under which a Flood Risk Assessment would be required.
- Indicating by way of a footnote the circumstances under which a Green Travel Plan would be likely to be required.
- With regard to heritage assets, ensuring consistency with the wording in the National Planning Policy Framework.

57. The relevant main modifications are **MM6, MM7, MM8, MM9, MM10, MM11A, MM11B, MM12, MM13A, MM13B, MM14, MM15, MM16 and MM17**. They are hereby recommended.

Decentralised Energy

58. In common with the policies discussed above, modifications to the provisions relating to decentralised energy are necessary to ensure effectiveness. The necessary modifications are **MM18 and MM19**. The policy would be modified by stating that:

- The policy provisions relate to waste *management* facilities.
- Energy from waste facilities will only be considered where they qualify as recovery operations.
- Energy from waste proposals would need to demonstrate that they would not compromise the management of waste in accordance with the waste hierarchy.

Sustainable Site Waste Management

59. To ensure effectiveness, WLWP Policy 5 Clause a needs to be modified to state that at least 10% of the materials or products used in construction *and* operation of the development are re-used or recycled and sourced from within 100 km of the site. In addition, Clause b needs to refer to the minimisation of construction, demolition and excavation waste. This is to ensure compliance with the waste hierarchy. Further, a new clause is necessary to address circumstances where on-site management is not possible. Active consideration would have to be given to transportation by modes other than road.

60. The necessary modifications are set out in main modifications **MM20, MM20A and MM21**. They are hereby recommended.

Issue 4 - Whether the site selection process has led to the identification of sites that would meet appropriately the need for new waste management capacity in West London

Non-Apportioned Capacity Gap

61. As indicated above, one of the key tasks of the West London Waste Plan is to meet the apportionment set out in the London Plan (2011). At present, the apportionment is below existing capacity. However, up until about 2029, arisings will exceed capacity by a significant margin (presently about 470,000 tonnes of capacity a year). This margin represents the "non-apportioned capacity gap".
62. In terms of provision a number of arrangements are in place. First, the West London Waste Authority has entered into a contract that involves the annual export of 300,000 tonnes of municipal solid waste to an energy from waste facility in South Gloucestershire. Secondly, there is a contract to supply waste to the Lakeside energy from waste plant. From 2015/16 this will be at a level of 90,000 tonnes a year. Thirdly, around 70,000 tonnes of waste may be sent annually to the Slough Heat and Power facility or exported abroad. In total, these arrangements amount to the treatment of some 460,000 tonnes of waste a year.
63. Representors have indicated that energy from waste is low down in the waste hierarchy and that it would be better to allocate additional sites in the re-use, recycling and materials recovery categories rather than to send large quantities of waste across country. This is a point that would be partly addressed by encouraging provision over and above the tonnages required to meet the London apportionment as addressed in the new policy on provision. However, the existence of the long-term contacts cannot be ignored. They largely fill the non-apportioned capacity gap. No allocations are needed in this regard.

Meeting the London Apportionment

64. The London apportionment concerns municipal solid waste and commercial and industrial waste. The requirement is to supply 614,000 tonnes of additional capacity by 2030. Under the West London Waste Plan, this would be met by the allocation of nine sites. Based on the assumptions discussed elsewhere, these sites could provide annual capacity in excess of 800,000 tonnes.
65. Some representors are concerned that the provision is too high; others too low. For my part, I recognise the possibility that not all the sites will be developed as envisaged or developed at all. A degree of flexibility is necessary. I do not consider that the provision is too high. As to whether the provision is too low, part of the argument is to the effect that the site selection process was flawed. Certain allocated sites should not have been selected. Others should have been included.
66. In large measure, sites have been selected based on the scores as recorded in reports such as the Potential Sites Assessment Technical Report (EB65). I appreciate that the methodology could be criticised on a number of levels. For example, different parameters could have been included, different multipliers

could have been applied and different scores could have been accorded. Nevertheless, I consider that the methodology adopted was perfectly reasonable. Even if the scores were varied in the light of up-to-date information, I do not consider that the selection of the allocated sites would be significantly undermined.

67. In determining whether the provision is too low, I have also had regard to the suitability of the allocated sites. To my mind they are all suitable for waste management development of one sort or another. They would provide for a mix of types of waste management development in appropriate locations across the boroughs. Bearing in mind also the fact that, under the Further Alterations to the London Plan, the apportionment to the west London boroughs is likely to be lower, I do not consider that any further allocations are necessary.
68. Notwithstanding the forgoing conclusion, I have considered the merits of all the omission sites that have been proposed for allocation. As discussed at the examination hearings, there are two main contenders. One site is known as Harlington Quarry. The other is the former coal yard at Tavistock Road.

Harlington Quarry

69. The Harlington Quarry site lies in the Green Belt south of the M4 motorway and generally to the northeast of Heathrow Airport. The site area is 2.59 ha. Representors envisage that an anaerobic digestion biogas plant would be erected on the site. This would be designed to process 49,500 tonnes of food waste a year sourced from within west London. Allocation of the site within the West London Waste Plan is sought although planning permission for a project specific proposal was refused by notice dated 30 October 2014.¹¹
70. In terms of potential allocation of the site, I start by recognising that development of the nature proposed would represent inappropriate development in the Green Belt. In this regard, national policy states that waste planning authorities should first look for suitable sites and areas outside the Green Belt.¹²
71. The representors have carried out an extensive search for potential sites. They have been looking for a site of some 2 ha and have dismissed smaller sites such as the Greenford Depot site (1.78 ha) and Twyford Waste Transfer Station (1.24 ha). The Western International Market site was dismissed principally because it was deemed to be unavailable.
72. For my part, I do not accept that smaller sites could not house an anaerobic digestion facility. The research study "Planning for Waste Management Facilities" points to sites with a typical area of 0.6 ha in the context of a development with a throughput of 40,000 tonnes a year.¹³ In addition, the West London Waste Authority is considering the suitability of the Twyford site for a facility with a capacity of 50,000 tonnes a year (ED29, Para 2.3). With regard to the Western International Market site, this was confirmed as available at the examination hearings.

¹¹ Application Ref: 2373/APP/2012/2011 (London Borough of Hillingdon)

¹² National Planning Policy for Waste, Para 6

¹³ Office of the Deputy Prime Minister, August 2004, Page 80

73. It is appropriate to consider the particular locational needs of some types of waste management facilities when preparing Local Plans. When developing anaerobic digestion plants, particular regard must be paid to operational considerations and surrounding land uses. However, whatever the merits of anaerobic digestion, and on the evidence before me, there are no exceptional circumstances that would warrant the allocation of the proposed Green Belt site at Harlington Quarry.

Tavistock Road

74. The Tavistock Road site is a former coal depot site, with rail siding, towards the western fringe of the Plan area. The site is designated as local employment land and has an area stated to be 8.96 ha. Planning permission for a materials recovery and recycling facility and Civic Amenities Site with an annual throughput of 950,000 tonnes of waste was refused in March 2014. The proposal was said to broadly comply with the London Plan. At the time of the examination hearings plans for a smaller scheme (450,000 tonnes) were in preparation.¹⁴
75. Opposition to the proposed allocation by the local residents' group and others has been well articulated. Nevertheless, there are points in favour of the site. In the Potential Sites Assessment report (EB65), a high score is awarded in recognition of the separation of the site from residential areas. It is also recorded that the site is large enough for co-location and that the development of a homogeneous structure could lead to an improvement in appearance, noise and dust impacts.
76. At the examination hearings, I was told that the designation as local employment land was to be removed. No information was forthcoming on proposed uses notwithstanding the size and value of the site. I do not necessarily see the removal of the designation as an impediment to waste development. Indeed, Planning Practice Guidance on waste (Paragraph 018) states that, as reviews of employment land are undertaken, it is important to build in the needs of waste management before releasing land for other development.
77. On the other hand, Planning Practice Guidance points to the suitability of local transport infrastructure as one of the factors likely to drive the identification of suitable sites and areas (Paragraph 037). In this regard, I saw that the access to the site, at its junction with Tavistock Road, is totally inadequate. In addition, heavy goods vehicles accessing the site would have to pass through areas and along highways that are unsuited to the volumes likely to be associated with a major waste use.
78. I appreciate that the site is and has the potential to be a major traffic generator in any event. However, I was told that there are no proposals to improve the access. In addition, I am concerned that the nature of the traffic would be damaging to the environment and local communities. In the circumstances, allocation of the site would not be appropriate.

¹⁴ The applicant company is now considering options for the site following a decision not to appeal against the refusal of planning permission or to proceed with the smaller scheme (Press Statement, Powerday, 20 January 2015)

Conclusions

79. I consider that the sites selection exercise was satisfactory. Sites suitable in nature, size, number and distribution to meet the on-going needs of the Plan area have been identified and allocated. The West London Waste Plan is sound without the inclusion of any other sites.

Issue 5 – Whether the allocated sites are acceptable in environmental terms and in other respects; whether the locations are deliverable; and whether the Plan provides an appropriate context for the successful development of waste management facilities

Preliminary Points

80. On a preliminary point, I note that there are a number of factual aspects of the Plan that are not supported by the evidence. In particular:

- The areas of the allocated sites need to be corrected in a number of instances (also the totals).
- The boundary of the Quattro site does not accurately reflect the potential developable area of the site.
- The boundary of the Forward Drive Council Depot site needs to be adjusted to accord with that shown in Policy AAP21 of the Harrow Action Area Plan. With this change, the allocated site would incorporate an existing household waste recycling centre and would require re-categorisation as an "existing site".

81. To correct these matters, a number of main modifications are proposed. These are main modifications **MM1, MM2A, MM2B, MM2C, MM3a and MM3**. The allocated sites would then be as follows:

Existing waste management sites as proposed for allocation

Twyford Waste Transfer Station
Veolia Transfer Station, Marsh Road
Greenford Reuse and Recycling Site
Greenford Depot, Greenford Road
Quattro, Victoria Road, Park Royal
Rigby Lane Waste Transfer Site
Council Depot, Forward Drive
Twickenham Depot

Additional site allocated in the Plan for waste management uses

Western International Market

82. A second preliminary matter concerns description of the various allocated sites and the considerations that would apply in bringing forward development proposals. Such provisions are central to the effectiveness of the Plan but are

absent from the Proposed submission version. Main modification **MM25** is recommended. As a result, a new appendix would be added to the Plan. This would contain a description of all the allocated sites and identify matters relevant to the determination of planning applications.

Capacity Assumptions

83. In matching the apportionment requirement with a sufficient array of sites, the boroughs have made assumptions as to the capacity of the allocated sites. They have assumed that the sites could be developed or redeveloped with facilities having an annual capacity of 65,000 tonnes a hectare. This nominal potential throughput is based on work carried out in connection with the London Plan. Where appropriate, a deduction has been made for existing capacity to represent the contribution to be provided from retained facilities.
84. Many of the existing waste management sites that are proposed for allocation house substantial buildings and structures that would pose a significant impediment to redevelopment. In addition, they are busy, active sites often providing important space for the parking of heavy goods vehicles such as refuse collection vehicles. These conditions, and constraints posed by adjacent land uses, have led representors to question the assumed capacity of the sites.
85. In response to doubts about how the sites might be developed and brought forward, the boroughs produced a paper entitled "Position Statements on Practicalities of Reorientation" (ED29). Amongst other things, this paper seeks to demonstrate that redevelopment of the sites in line with the boroughs' assumptions is indeed a realistic proposition.
86. The concerns of representors tended to be of a general nature. There was no worked demonstration of difficulties at any particular site. For my part, I acknowledge that redevelopment of many of the sites will prove to be a challenge. However, bearing in mind the work presented in the boroughs' paper, I have no reason to dismiss the broad assumptions that have been made.

Twyford Waste Transfer Station

87. I continue with an assessment of sites where significant issues have been identified. The first of these is the Twyford Waste Transfer Station, Abbey Road, Brent. This is a site of 1.24 ha that is currently used as a household waste recycling centre and as a waste transfer station for trade waste that also hosts a wood processing operation. It is owned and operated by the West London Waste Authority.
88. The adjacent site has the benefit of planning permission, granted in 1993, for an hotel, television centre and social, community and leisure facilities. There has been a commencement of development and the sponsors are intent on proceeding with the scheme. The key issues, to my mind, are compatibility with the proposed allocation and the availability of access.
89. Dealing with the access point first, I note that part of the access is in the ownership of the representors. They have questioned the right to redevelop the allocated site for the purposes proposed bearing in mind their interests in

the access. This was a matter that was considered at the examination hearings. Guidance was given by the barrister representing the London Borough of Hillingdon. My conclusion, having heard the evidence, is that use of the access in connection with waste development can lawfully take place (subject to consideration of the level of interference). Therefore, there would be no impediment to the allocation.

90. On the matter of the compatibility of the land uses, I have no doubt that a very prestigious development is planned by the representors. To avoid prejudicial effects, considerable care would need to be taken in developing and operating the waste management site. Policies in the development plan provide a degree of protection in this regard.
91. Proposals for waste development should carefully consider existing and proposed neighbouring land uses and ensure that any development would not result in any significant adverse impact on permitted uses. In particular, such impacts would include those which might arise from the construction and operation of the site and the movement of vehicles associated with any proposal. To draw attention to the need to address this particular matter, I am recommending the addition of related wording to the boroughs' appendix containing descriptions of allocated sites. Main modification **MM24 (part)** refers.

Western International Market

92. The Western International Market site comprises level and undeveloped land extending to 3.2 ha. It is the only allocated site that is not an existing waste management site. It lies adjacent to the Green Belt and north of the M4 motorway. Developments to the north of the site include a Costco warehouse and a data centre. The Costco warehouse sells foodstuffs and includes a café. As to the data centre, evidence submitted on behalf of the operator suggested that this is extremely sensitive to dust emissions including corrosive gaseous compounds.
93. It is apparent that, in the past, there may have been an intention to retain the allocated site as open space. This was as part of a deal to off-set the loss of Green Belt land occasioned by the relocation and redevelopment of the Western International Market. This intention has featured in negotiations regarding other developments in the area.
94. However, there is no contractual commitment or covenant in this regard. Whilst land to the south, west and east is subject to a Green Belt-related policy, there is no related policy or designation that affects the allocation site. In my view, the site is ripe for development. Given adequate safeguards to respect the Green Belt and other matters, I see no related grounds for denying the allocation. A suitable modification would be introduced under main modification **MM24 (part)**.
95. With regard to adjacent land uses, it is clear that, amongst other things, potential pollution from the allocated site is a major issue. The data centre is particularly vulnerable in this regard. In this regard, a degree of protection is available under the existing and emerging development plan. Relevant policies include WLWP Policy 3, Policy ENV-P.1.6 of Hounslow's Unitary

Development Plan and Policy EQ4 of the emerging Hounslow Local Plan (EB30).

96. In addition, and in common with the Twyford Waste Transfer Station site, I am recommending a modification highlighting the need to consider existing and proposed neighbouring land uses (main modification **MM24 (part)**). It may be that waste management development on the Western International Market sites would have to be curtailed. Nevertheless, this does not rule out allocation of the site. The precise extent of appropriate development can be determined at the application stage.

Issue 6 - Whether there are clear arrangements for monitoring the Plan and reporting the results as part of a delivery strategy with clear targets and measurable outcomes

97. With regard to Plan review, matters relevant to monitoring and reporting are identified in Paragraph 9 of the National Planning Policy for Waste. However, the simple recording of raw data would be insufficient. I would expect to see triggers that would prompt a review of the provisions of the Plan.
98. The proposed submission West London Waste Plan is lacking in this regard. In response, it is proposed to introduce triggers that would set in train a review or partial review of the Plan. In this way, and to give effect to national policy, there would be clear arrangements for monitoring the Plan and reporting the results as part of a delivery strategy that has clear targets and measurable outcomes. Main modification **MM21A** refers. The revised table would also identify the Strategic Objectives that would be monitored.

Overall Conclusion and Recommendation

99. The Plan has a number of deficiencies in relation to soundness and/or legal compliance for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.
100. The borough councils requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the West London Waste Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Andrew S Freeman

INSPECTOR

This report is accompanied by the Appendix containing the main modifications

Appendix A – Main Modifications

Key to the Schedule of Main Modifications:

- Additions of new text are shown in bold, green and italicised *like this*
- Deleted text is shown with a strike through and yellow highlight ~~like this~~

The page numbers and paragraph numbering below refer to the “Proposed submission plan” (SD8) and do not take account of the deletion or addition of text.

Ref. No.	Page	Policy/ Paragraph	Main Modification																																					
MM1	Throughout Plan	Throughout Plan	Reference to the combined total area of sites allocated in the Plan changed from '15.24'ha to '15.52'ha																																					
	Pages ii and iii	Table i and ii	<p>Modifications made to reflect those made to tables 5-1 and 5-2</p> <p><i>Table i: Existing waste sites proposed for allocation</i></p> <table border="1"> <thead> <tr> <th>Site Number</th> <th>Name</th> <th>Site Area (ha)</th> <th>Borough</th> </tr> </thead> <tbody> <tr> <td>352</td> <td>Twyford Waste Transfer Station</td> <td>1.24</td> <td>Brent</td> </tr> <tr> <td>1261</td> <td>Veolia Transfer Station, Marsh Road</td> <td>2.71</td> <td>Brent</td> </tr> <tr> <td>309*</td> <td>Greenford Reuse & Recycling Site</td> <td rowspan="2">1.78</td> <td rowspan="2">Ealing</td> </tr> <tr> <td>310*</td> <td>Greenford Depot, Greenford Road</td> </tr> <tr> <td>328#</td> <td>Quattro, Victoria Road, Park Royal</td> <td>0.97 0.7</td> <td>Ealing</td> </tr> <tr> <td>222</td> <td>Council Depot, Forward Drive</td> <td>2.31</td> <td>Harrow</td> </tr> <tr> <td>331</td> <td>Rigby Lane Waste Transfer Station</td> <td>0.91 0.84</td> <td>Hillingdon</td> </tr> <tr> <td>342</td> <td>Twickenham Depot</td> <td>2.67</td> <td>Richmond</td> </tr> <tr> <td>Total</td> <td></td> <td>10.21 12.32</td> <td></td> </tr> </tbody> </table> <p>*These two sites are contiguous and part of a larger site: for the purposes of the Plan, they are considered as a single, consolidated site # This site is subject to a High Speed 2 (HS2) Safeguarding Direction and will not be available from 2017 until 2024</p> <p><i>Table ii: Additional sites identified allocated in the Plan for waste management uses</i></p>	Site Number	Name	Site Area (ha)	Borough	352	Twyford Waste Transfer Station	1.24	Brent	1261	Veolia Transfer Station, Marsh Road	2.71	Brent	309*	Greenford Reuse & Recycling Site	1.78	Ealing	310*	Greenford Depot, Greenford Road	328#	Quattro, Victoria Road, Park Royal	0.97 0.7	Ealing	222	Council Depot, Forward Drive	2.31	Harrow	331	Rigby Lane Waste Transfer Station	0.91 0.84	Hillingdon	342	Twickenham Depot	2.67	Richmond	Total		10.21 12.32
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2861	Western International Market	3.20	Hounslow
Total		5.03 3.20	

Combined Total Area = 15.2452 hectares

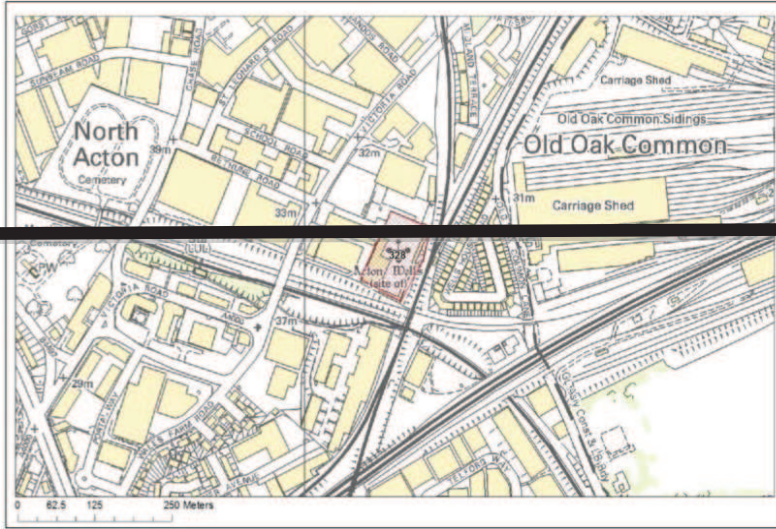
MM1A	Page 3	1.2.3	After “The West London Waste Plan will form part of the Development Plan for each of the boroughs.” Insert new sentence: <i>This Plan supersedes certain policies in other Borough Development Plan Documents as set out in Appendix 7.</i>
MM1B	Page 3	1.3.1	Add new sentence: <i>The Plan supports the implementation of the boroughs’ Sustainable Community Strategies in several ways which follow the three pillars of sustainable development, which underpin the Sustainable Community Strategies, as follows:</i> <ul style="list-style-type: none"> – <i>Social: The Plan ensures that waste is managed in a way that protects communities and their health;</i> – <i>Environmental: The Plan ensures that waste will be managed in a manner that does not harm the environment</i> – <i>Economic: The Plan seeks to provide sufficient opportunities for the management of waste that is an essential part of a high performing economy.</i>

MM1BB	Page 5	1.3.6	<p>National Planning Policy for Waste Statement 10</p> <p>1.3.6 National Planning Policy for Waste Statement 10: Planning for Sustainable Waste Management⁴ sets out national objectives and guidance to be considered when producing planning policies for waste development and consideration of applications for waste development. The Government intends to update this policy.</p> <p>Change to related footnote:</p> <p>⁴ National Planning Policy for Waste, October 2014 https://www.gov.uk/government/publications/national-planning-policy-for-waste Planning Policy Statement 10, revised March 2011 http://www.communities.gov.uk/documents/planningandbuilding/pdf/1876202.pdf</p>
MM1C	Page 13	West London Waste Plan Vision	<p>By Over the period to 2031, the West London Waste Plan area will have made provision for enough waste management facilities of the right type and in the right locations to provide for the sustainable management of waste guided by the waste hierarchy to achieve net self-sufficiency and meet the needs of local communities. It will seek to do so, in a progressive manner, whilst protecting the environment, stimulating the economy and balancing the needs of West London's communities.</p>
MM1D	Page 13	West London Waste Plan Strategic Objectives 1	<p>To identify sufficient land for the management of the six boroughs' pooled waste apportionment as set out in the London Plan (2011), including safeguarding existing waste sites and maximising their use as waste management sites and to provide for the sustainable management of an amount of waste equivalent to the amount arising within the Plan Area.</p>
MM1E	Page 20	3.5.1	<p>Hazardous Wastes</p> <p>Hazardous wastes are categorised as those that are harmful to human health, or the environment, either immediately or over an extended period of time. They range from asbestos, chemicals, and oil through to electrical goods and certain types of healthcare waste. A detailed study of arisings¹⁸ has been undertaken which found the following:</p> <ul style="list-style-type: none"> In 2012, West London produced just under 100 over 88,000 tonnes of which approximately 87 75% was exported for management.

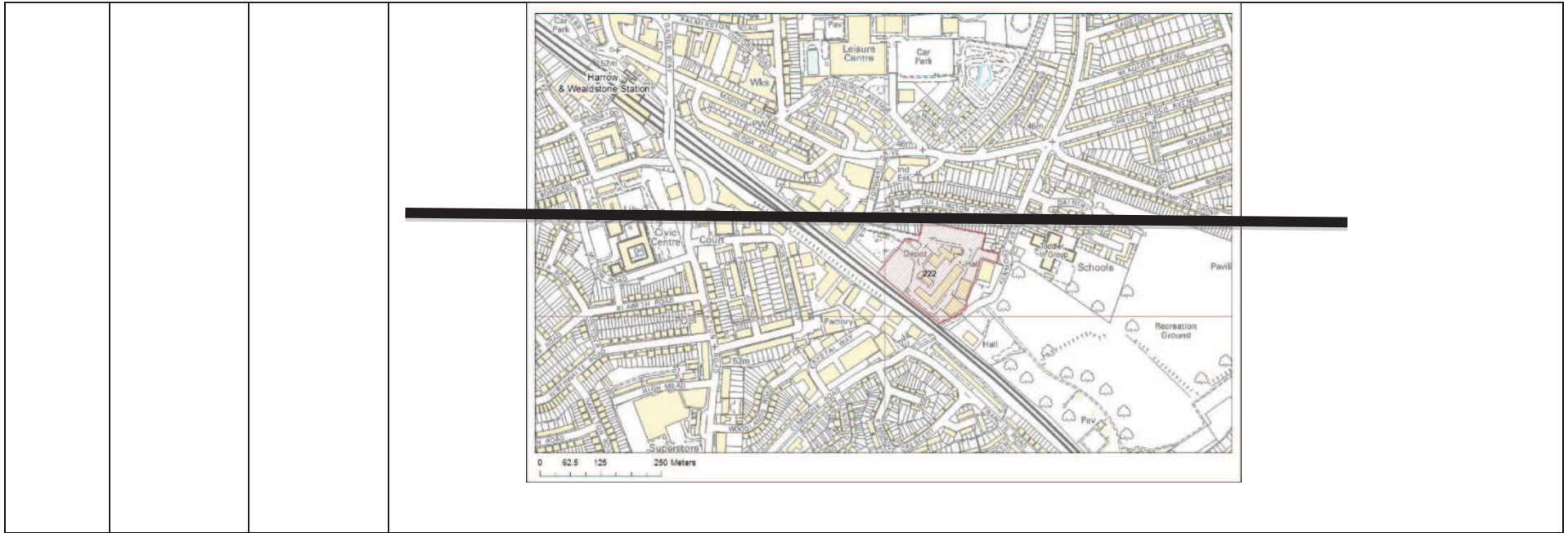
			<ul style="list-style-type: none"> • <i>At the same time 20,000 tonnes was imported from outside the Plan area.</i> • <i>Overall the Plan Area achieved 40% net self sufficiency in 2012. Compared with other waste streams generated in West London,</i> <p><i>Hazardous waste is not a large waste stream, but does requires a range of specialist facilities for treatment and disposal, but it is not anticipated that substantial additional need for new capacity locally will arise and so land allocations specifically for the development of additional hazardous waste management capacity have not been identified in this Plan.</i></p> <p>Insert related footnote:</p> <p><i>¹⁸Estimate of Baseline, Forecast, Management & Flows for Hazardous Waste Arising in west London Final issue v1.0 27.02.14, BPP Consulting</i></p>
MM1F	Page 28	4.4.1	<p><i>Construction, Demolition and Excavation (CD & E) waste is a large waste stream within London, although it is not included within the London Plan (2011) apportionment target assigned to boroughs. Work undertaken in support of the Plan has established that the Plan Area has a substantial quantity of processing capacity for this waste stream and that the London Plan (2011) city-wide targets of 95% recycling and reuse by 2020 are close to being met. This is expected to continue into the future and accordingly no allocations are made in this plan for facilities dealing specifically with such wastes. However the evidence also indicates that it is not possible for the more specific target of 80% of that recycling to be met in the form of aggregates by 2020 due to the lack of suitable waste. The preference in West London is to ensure more on-site recycling and re-use on construction sites together with effective use of existing waste management sites and the appropriate provision of facilities at mineral extraction sites to ensure adequate provision of treatment capacity for this waste stream. Particular policy encouragement will be given to development of capacity for the production of material suitable for use as substitutes for virgin materials such as recycled aggregates.</i></p>
MM1G	Page 29	4.5.2	<p>Work undertaken in support of the Plan²⁵ has established that the Plan area has a moderate level of capacity for this waste stream with a number of sites managing hazardous waste within the Plan area. Other flows have been tracked</p>

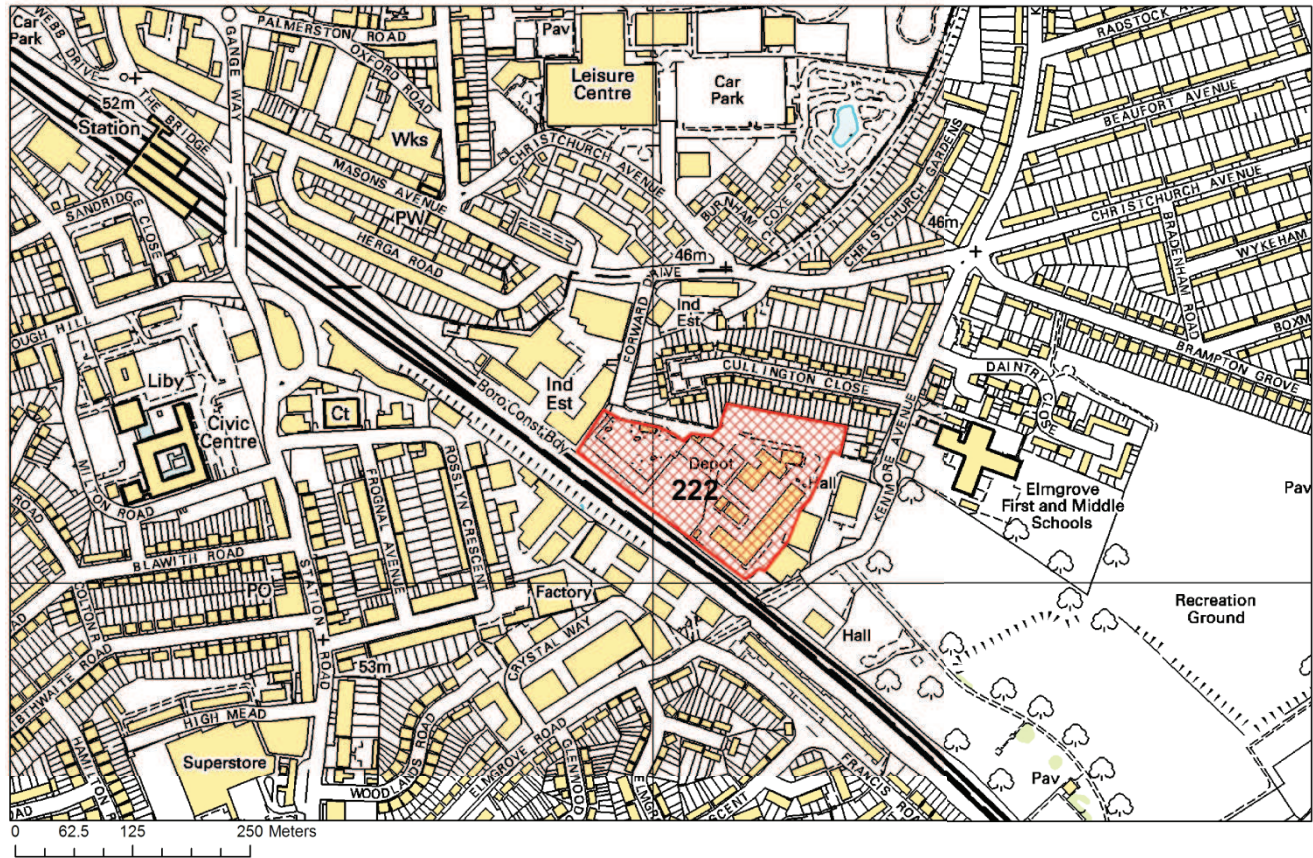
			<p>with the general finding being that waste of this type travels within 1.5 hours of the Plan area for treatment. These resilience of these flows are subject to further have been confirmed by contacting the appropriate receiving authorities. investigation under the Duty to Co-operate requirements but It is not anticipated that a substantial local need for new capacity will arise be identified. The West London Waste Plan therefore makes no specific provision for hazardous wastes and so land allocations specifically for the development of additional hazardous waste management capacity have not been identified in this Plan. However policy WLWP 1 is included to encourage the development of further capacity where it is identified as being needed in the regional context. Planning applications for new hazardous waste facilities will be determined in the same way as applications for all waste management facilities and the capacity of hazardous waste facilities will be monitored closely to establish whether additional provision is required at a later date.</p> <p>Insert related footnote:</p> <p>²⁵<i>Estimate of Baseline, Forecast, Management & Flows for Hazardous Waste Arising in west London Final issue v1.0 27.02.14, BPP Consulting</i></p>																																	
MM2A	Page 31	Table 5-1	<table border="1"> <thead> <tr> <th>Site Number</th> <th>Description</th> <th>Site Type</th> <th>Site Area (ha)</th> <th>Borough</th> </tr> </thead> <tbody> <tr> <td>352</td> <td>Twynford Waste Transfer Station</td> <td>Transfer Station</td> <td>1.24</td> <td>Brent</td> </tr> <tr> <td>1261</td> <td>Veolia Transfer Station, Marsh Road</td> <td>Transfer Station</td> <td>2.71</td> <td>Brent</td> </tr> <tr> <td>309*</td> <td>Greenford Reuse & Recycling Site</td> <td>Transfer Station</td> <td rowspan="2">1.78</td> <td rowspan="2">Ealing</td> </tr> <tr> <td>310*</td> <td>Greenford Depot, Greenford Road</td> <td>Depot Facility</td> </tr> <tr> <td>328#</td> <td>Quattro, Victoria Road, Park Royal</td> <td>Transfer Station</td> <td>0.97 0.7</td> <td>Ealing</td> </tr> <tr> <td>222</td> <td>Council Depot, Forward Drive</td> <td>Depot Facility</td> <td>2.31</td> <td>Harrow</td> </tr> </tbody> </table>	Site Number	Description	Site Type	Site Area (ha)	Borough	352	Twynford Waste Transfer Station	Transfer Station	1.24	Brent	1261	Veolia Transfer Station, Marsh Road	Transfer Station	2.71	Brent	309*	Greenford Reuse & Recycling Site	Transfer Station	1.78	Ealing	310*	Greenford Depot, Greenford Road	Depot Facility	328#	Quattro, Victoria Road, Park Royal	Transfer Station	0.97 0.7	Ealing	222	Council Depot, Forward Drive	Depot Facility	2.31	Harrow
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MM2B	Page 35	Table 5-2	<table border="1"> <thead> <tr> <th>Site Number</th> <th>Name</th> <th>Site Area (ha)</th> <th>Borough</th> </tr> </thead> <tbody> <tr> <td>222</td> <td>Council Depot, Forward Drive</td> <td>1.83</td> <td>Harrow</td> </tr> <tr> <td>2861</td> <td>Western International Market</td> <td>3.20</td> <td>Hounslow</td> </tr> <tr> <td>Total</td> <td></td> <td>5.033 3.20</td> <td></td> </tr> </tbody> </table>						Site Number	Name	Site Area (ha)	Borough	222	Council Depot, Forward Drive	1.83	Harrow	2861	Western International Market	3.20	Hounslow	Total		5.033 3.20	
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2861	Western International Market	3.20	Hounslow																					
Total		5.033 3.20																						
MM2C	Page 26	Para 4.2.7	<p>To meet this land requirement, six eight existing waste sites (accounting for 10.23 12.32 hectares) have been identified as suitable and available for redevelopment. An additional 5.03 3.20 hectares of land currently not developed for waste management use has also been identified as suitable and deliverable</p> <p>Amend Para 4.2.7 to read '5.51 hectares' and para 4.2.8 to read '15.52 hectares'</p>																					
MM3a	Page 33	Plan for Site 328, Quattro, Park Royal, Ealing	Replace plan for Site 328, Quattro, Park Royal, Ealing																					



MM3	Page 35	Plan for Site 222 Council Depot, Forward Drive Harrow	Replace plan for Site 222 Council Depot, Forward Drive Harrow





MM3B	Throughout Plan Page 43	All policies New policy WLWP 1	Policy numbers to change in light of insertion of new policy WLWP1 Insert the following new paragraphs and Policy WLWP1: Policy WLWP 1 - Provision of New Waste Management Capacity
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		<p><i>The following policy is aimed at delivering the necessary minimum amount of additional waste management capacity of the right type and at the right time. Developments are to accord with all parts of the development plan unless material considerations indicate otherwise. Particular attention will be given to avoiding unacceptable harm to the environment and adverse effects on the well-being of communities.</i></p> <p><i>In respect of Municipal Solid Waste, and Commercial and Industrial Waste, the main requirement arising out of the London Plan (2011) is to meet the stated apportionment for the six West London boroughs combined. This is the principal aim of the policy. However, the current London Plan (2011) projections indicate that net self-sufficiency would not be achieved until 2029 for London as a whole. In the interim, there would be a gap between the quantity of eligible existing capacity within West London (the apportionment baseline of 1.64 million tpa) and the quantity of MSW and C&I waste forecast to arise in West London. In these circumstances, the provision of capacity to manage the requisite London Plan tonnages at a faster rate than indicated will be encouraged. The expectation is that substantive provision would be made on allocated sites (Policy WLWP 2) in the first instance. Any such provision should be consistent with the waste hierarchy.</i></p> <p><i>Policy WLWP 1 - Provision of New Waste Management Capacity</i></p> <p><i>Apportioned Waste – MSW & Commercial and Industrial Waste</i> <i>Over the period to 2031, there is a need for about 614,000 tonnes of additional annual capacity to meet the apportionment set in the London Plan (2011). This is to be delivered on the allocated sites identified in Policy WLWP 2 as follows:</i></p> <ul style="list-style-type: none"> <i>• 162,000 tonnes in the period up to 2021</i> <i>• A further 221,000 tonnes (total 383,000 tonnes) in the period 2021 to 2026</i> <i>• A further 231,000 tonnes (total 614,000 tonnes) in the period 2026 to 2031</i> <p><i>The requirement is for capacity in the re-use, recycling, and other recovery categories.</i></p> <p><i>Provision over and above the tonnages required to meet the London Plan (2011) apportionment and of a nature similar to that identified above will be encouraged where this would contribute towards net self-sufficiency.</i></p> <p><i>Provision should be made in accordance with the waste hierarchy^{27A} and this should be addressed and justified as a pre-requisite of any grant of planning permission.</i></p>
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			<p>Non apportioned Waste <i>Development of management capacity will be supported in principle that contributes towards net self sufficiency across the Plan Area for:</i></p> <p><i>a. Construction, Demolition and Excavation Waste in accordance with the waste hierarchy with particular support for the production of material suitable for use as substitutes for virgin materials such as recycled aggregates; and</i></p> <p><i>b. Hazardous waste treatment capacity that accords with any hazardous waste strategy, or similar, prepared by the Mayor of London.</i></p> <p>Insert footnote: 27A Provision would not constrain movement up the waste hierarchy</p>
MM4A	Page 37	Policy WLWP 2 (previously policy WLWP 1)	<p>Land accommodating existing waste management uses in West London will be protected for continued use for waste management^{27b}, together with waste transfer and civic amenity sites required for the delivery of the West London Waste Authority's (WLWA) Municipal Waste Strategy.</p>
MM4B	Page 37	Policy WLWP 2 (previously policy WLWP 1)	<p>Insert footnote: 27b Existing waste management sites are those sites managing waste which are lawfully permitted to do so as set out in Appendix 2. The latest list of existing waste management sites will be found in Authority Monitoring Reports. Safeguarded existing permitted facilities will be shown on the Policies Maps associated within each Boroughs' Local Plan</p>

MM4C	Page 37	Policy WLWP 2 (previously policy WLWP 1)	<p>Existing waste transfer sites which have been allocated as having the potential for capacity expansion by redevelopment to waste management (Table 5-1) and new sites with potential for development for waste management facilities (Table 5-2) will also be safeguarded.</p> <p>Development for non-waste uses will only be considered on land in existing waste management use^{27C}, waste transfer sites, civic amenity sites or land allocated in Table 5-2 if compensatory and equal provision of capacity sites for waste, in scale and quality, is made elsewhere within the West London boroughs.</p> <p>Insert footnote 27C As stated in paragraph 5.14 the Quattro site is subject to HS2 safeguarding direction and therefore may be expected to be developed as an exception to this policy until 2024</p>
MM5	Page 38	Paras 6.2.3 to 6.2.6 and policy WLWP 3 (previously policy WLWP 2)	<p>The Plan identifies the safeguarded existing sites and proposed sites considered appropriate and suitable for waste management use development as set out in Table 5-1 and Table 5-2. Policy WLWP 2 sets out the key criteria against which planning applications for waste management capacity facilities will be determined for the proposed sites.</p>
MM5A	Page 38	Ditto	<p>Policy WLWP 3 also sets out the circumstances under which development proposed on unallocated or new sites may also come forward.</p>
MM5C	Page 38	Ditto	<p>Assessments of ongoing requirements for capacity to meet the London Plan apportionment will take account of the most recent monitoring of the implementation of the Plan.</p>
MM5D	Page 38	Ditto	<p>Policy WLWP 23 – Location of Waste Development Waste development proposals on existing waste management sites^{28A}, waste transfer and civic amenity sites and the</p>

MM5E	Page 38	Ditto	<p>sites listed in Table 5-2 will generally be supported, provided that the proposals comply with the Development Plan for the area other WLWP policies and the boroughs' adopted development plans. Waste development on other sites may be permitted will be supported in principle if the proposals comply with the other WLWP policies and the boroughs' adopted development plans, and:</p> <p>a. It can be demonstrated that the development is not suitable for, or cannot be delivered at any available and suitable existing waste management sites within the Borough²⁹ where the development is proposed, waste transfer sites, civic amenity sites and at the sites listed in Tables 5-1 and 5-2; and</p>
MM5F	Page 38	Ditto	<p>b. In the case of facilities proposed for the management of MSW and C&I waste, identified sites in Tables 5-1 and 5-2 have not come forward and it can be demonstrated that there is will be a shortfall in the waste management capacity required to meet the boroughs' joint apportionment target as specified in Policy WLWP 1; and</p>
MM5G	Page 38	Ditto	<p>c. There is no adverse cumulative effect, when taken together with existing waste management facilities, on the well-being of the local community, including any significant adverse impacts against the WLWP sustainability objectives (see Appendix 1); and</p>
MM5H	Page 38	Ditto	<p>d. The proposed site meets the criteria set out in the subsequent WLWP Policies where if applicable.</p>
MM5I	Page 38	Ditto	<p>Insert new footnote:</p> <p>28A Existing waste management sites are those sites managing waste which are lawfully permitted to do so as set out in Appendix 2. The latest list of existing waste management sites will be found in Authority Monitoring Reports.</p>
MM5J	Page 38	Ditto	<p>Insert new footnote:</p> <p>29 Prospective developers are encouraged to contact the local planning authority for pre-application advice on suitability of existing sites. Suitability may be taken to mean capable of accommodating the type and scale of activity proposed including consideration of any specific requirements that arise from the Plan policies and operational needs.</p>

MM6	Page 40	Policy WLWP 4 (previously policy WLWP 3)	b. Adequate means of controlling noise, vibration, dust, litter, vermin, odours, air and water-borne contaminants and other emissions are incorporated into the scheme ³¹ ;
MM7	Page 41	Policy WLWP 4 footnote	³¹ <i>Where necessary, this is to be demonstrated through the submission of noise, air, odour and vibration surveys, impact assessments and proposed mitigation measures</i>
MM8	Page 40	Policy WLWP 4 (previously policy WLWP 3)	The development is of a scale, form and character appropriate to its location and incorporates a high quality of design, to be demonstrated through the submission of a Design and Access statement ³² <i>as appropriate</i> ;
MM9	Page 41	Policy WLWP 4 footnote	³² <i>Not all developments will need a Design and Access Statement - the need for such a statement is specified in legislation and reflected in local validation lists.</i>
MM10	Page 40	Policy WLWP 4 (previously policy WLWP 3)	c. Active consideration has been given to the transportation of waste by modes other than road, principally by water and rail <i>and this has been incorporated into the scheme or proven not to be practicable</i> ;
MM11A	Page 40	Policy WLWP 4 (previously policy WLWP 3)	d. Transport directly and indirectly associated with the development will not exceed the capacity of the local road network or result in any significant adverse impact on the amenities of the area. Where necessary, this is to be demonstrated by a Transport Impact Assessment ^{31A} ;
MM11B	Page 41	Ditto	Insert footnote 31A: <i>It should be assumed that waste management proposals will require a Transport Assessment although the need for one should be confirmed with the Highway Authority at the earliest opportunity.</i>
MM12	Page 40	Policy WLWP 4	e. <i>The development makes a positive contribution to climate change adaptation and mitigation to be</i>

		(previously policy WLWP 3)	demonstrated through the submission of a Sustainable Design and Construction statement;
MM13A	Page 40	Policy WLWP 4 (previously policy WLWP 3)	g-f. An appropriate BREEAM ²⁴³³ or CEEQUAL ²²³⁴ rating, as specified in borough Development Plans , will be achieved in order to comply with adopted borough Development Plans;
MM13B	Page 40	Policy WLWP 4 (previously policy WLWP 3)	h. There would not be a significant impact on the quality of surface and groundwater. The development should incorporate the principles of Sustainable Drainage Systems (SUDS) unless evidence is provided to justify alternative drainage methods;
MM14	Page 41	Policy WLWP 4 (previously policy WLWP 3)	j i. Where necessary ^{33A} , this is to be demonstrated by a Flood Risk Assessment; Insert footnote 33A: As specified by the National Planning Practice Guidance
MM15	Page 41	Policy WLWP 4 (previously policy WLWP 3)	j. Green Travel Plans have been considered, where appropriate ^{33B} . Insert footnote 33B: It should be assumed that waste management proposals will require a Green Travel Plan although the need for one should be confirmed with the Highway Authority at the earliest opportunity. f.—
MM16	Page 41	Policy WLWP 4 (previously policy WLWP 3)	k l. The site does not contain features, or will have a significant adverse effect on will not lead to substantial harm to, or loss of significance of , any heritage assets such as conservation areas, archaeological sites, listed buildings etc;
MM17	Page 41	Policy 4 Footnotes	³³ BREEAM: Building Research Establishment Environmental Method – an established method of assessing, rating and certifying

			<p><i>the sustainability of buildings. www.breeam.org</i></p> <p>³⁴<i>CEEQUAL: Civil Engineering Environmental Quality Assessment and Award Scheme – a UK industry evidence scheme for assessing environmental and sustainability performance in civil engineering, infrastructure, landscaping and public realm projects. www.ceequal.com</i></p>
MM18	Page 42	Policy WLWP 5 (previously policy WLWP 4)	All waste management facilities that are capable of directly producing energy or a fuel must secure, where reasonably practicable:
MM19	Page 42	Policy WLWP 5 (previously policy WLWP 4)	Energy from waste facilities will only be considered where it can be demonstrated that they are a qualify as a recovery operation facility as defined in the Waste Framework Directive. Proposals for Energy from Waste should demonstrate that they will not compromise the management of waste in accordance with the waste hierarchy requirement of the Waste Framework Directive.
MM20A	Page 43	Policy WLWP 6 (previously policy WLWP 5)	At least 10% of the materials or products used in the construction and or operation of the development are re-used or recycled and sourced from within 100km from the site;
MM20	Page 43	Policy WLWP 6 (previously policy WLWP 5)	b. Construction, demolition and excavation wastes are minimised and then reused or recycled on site, where practicable and environmentally acceptable; and
MM21	Page 43	Policy WLWP 6 (previously policy WLW P5)	Insert additional clause 'd': d. Where on-site management of waste is not possible, active consideration has been given to the transportation of construction, demolition and excavation wastes away from the site by modes other than road, principally by water and rail and this has been incorporated into the scheme or proven not to be practicable.

MM21A	Page 46	Table 7-1	Changes to Table 7-1 "Monitoring programme for the West London Waste Plan" to be main modifications (see below)					
			WLWP Policy & Strategic Objective	Indicator	Reason	Delivery	Delivery Agency	Trigger for review of Plan/policy
			Policy WLWP 1 2 & 3 <i>Objectives 1, 2, 5</i>	Number and capacity of safeguarded sites and amount of any compensatory land provided	To ensure no loss of waste capacity in the West London area	The planning process	Local Authorities Waste industry Developers	<i>The waste management capacity provided by existing and allocated sites falls to a level 10% below or rises to a level 10% above that required by the London Plan apportionment.</i>
			Policy WLWP 3 4	Number, type and capacity of	Compliance with sequential policy approach	The planning process	West London Waste Authority	<i>1. 10% of existing sites are</i>

			<p>Objectives 1, 3, 4, 5</p> <p>waste facilities approved and completed at safeguarded sites and new identified sites</p> <p>Impact of new sites measured using:</p> <p>1. Number of sites failing to comply with any relevant environmental permit</p> <p>2. Number of enforcement complaints breaches of conditions</p> <p>3. Negative</p>	<p>To ensure adequate waste capacity is being provided</p> <p>To ensure sites are not causing harm to the environment or communities including heritage assets.</p>	<p>and combined private and public initiative to provide waste management developments</p>	<p>Waste industry</p>	<p>failing to comply with any relevant environmental permit.</p> <p>2. Substantiated complaints regarding permitted waste sites exceed one per borough in any six month period.</p> <p>3. Breaches of conditions exceed one per borough in any six month period.</p> <p>4. One existing waste site</p>	
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				<i>impact/damage to heritage asset or setting</i>				<i>causes a negative impact or damage to a heritage asset or setting (confirmed by English Heritage).</i>	
			Policy WLWP 4 5 <i>Objectives 1, 3, 5</i>	Amount of energy produced and delivered	To ensure compliance with the aims of the London Plan (2011) and prescribed carbon savings	Through the planning and permitting process.	Local Authorities Waste industry Developers	<i>One existing permitted thermal treatment facility operating without harnessing energy</i>	
			Policy WLWP 5 6 <i>Objectives 1, 2, 5</i>	Amount of construction waste sent to landfill	To monitor progress towards Plan strategy of zero waste to landfill.	Use of Site Waste Management Plans; monitoring and enforcement of these and planning conditions	Developers West London Boroughs	<i>Amount of construction waste sent to landfill (for non-engineering purposes) exceeds London Plan landfill diversion</i>	

								<i>targets</i>	
			Policy WLWP 6-7 <i>Objectives 1, 5</i>	The success of the implementation of Policy WLWP 6-7 will be dependent on the success of implementation of all other policies	To ensure compliance with the NPPF	Through the planning process	Developers West London Boroughs	<i>N/A</i>	
MM21B	Page 47	7.2 (Para 7.2 to become para 7.3)	a. Insert " <i>The Boroughs will carry out appropriate inspections of waste facilities when investigating compliance with planning conditions and possible breaches of planning control.</i> "						
MM21C	Page 58	Insert new Appendix 1	<i>No</i>	<i>Objectives</i>					
			<i>1</i>	<i>To create conditions to improve health and well being of the community</i>					
			<i>2</i>	<i>To improve health and safety of workers</i>					
			<i>3</i>	<i>To reduce waste related crime</i>					
			<i>4</i>	<i>To actively challenge discrimination in a consistent and comprehensive way and ensure equal access to waste management services</i>					
			<i>5</i>	<i>To promote social inclusion and ensure that waste management sites do not have a disproportionate effect on communities</i>					

			6	<i>To protect, manage and, where possible, improve local environmental quality (noise, air quality, light, vermin etc.)</i>	
			7	<i>To ensure active voluntary and community engagement in decision making for waste planning</i>	
			8	<i>To provide opportunities for waste education and awareness raising</i>	
			9	<i>To reduce the need to travel and improve choice and use of more sustainable transport modes</i>	
			10	<i>To minimise the impacts of waste related transport by promoting sustainable transport including rail and water freight transport options</i>	
			11	<i>To protect and, where possible, enhance biodiversity</i>	
			12	<i>To protect and improve surface and Groundwater quality</i>	
			13	<i>To reduce the risk and impacts of flooding</i>	
			14	<i>To use derelict, vacant or previously developed land and buildings</i>	
			15	<i>To prevent air pollution or limit it to levels that do not damage natural systems (including human health)</i>	
			16	<i>To encourage energy efficiency, maximise use of renewable energy sources and minimise greenhouse gas emissions</i>	
			17	<i>To mitigate the impacts of climate change</i>	
			18	<i>To protect maintain and enhance the quality, integrity and distinctiveness of West London's open space/green infrastructure, landscape and townscape including its historic environment and cultural assets</i>	
			19	<i>To minimise the production of waste and increase reuse, recycling, composting and recovery rates</i>	
			20	<i>To improve utilisation of waste related resources</i>	
			21	<i>To minimise the impacts of hazardous waste</i>	

			<p>22 <i>To actively promote clean technologies, particularly potential growth sectors of the economy</i></p> <p>23 <i>To ensure that West London uses natural resources more efficiently and sustainably in particular land, mineral aggregates and water</i></p> <p>24 <i>To promote sustainable design and construction techniques for both new and existing waste management facilities</i></p> <p>25 <i>To maximise economic opportunities and benefits for development of waste management facilities</i></p> <p>26 <i>To ensure that inward investment projects are environmentally, socially and economically sustainable</i></p> <p>27 <i>To maximise opportunities for the local workforce</i></p>
MM22	Page 58	(Former) Appendix 1	Added: F M Conway Ltd (and details)
MM22A	Page 59	Ditto	Bridgemarts (and details)
MM22B	Page 59	Ditto	Modify entry for Iver Recycling (UK) Ltd in Hillingdon as follows: Add tick in 'apportionment' and modify description to 'MSW/C&I Waste Processing/Transfer'
MM23	Page 61	Ditto	Deleted: Quattro (UK) Ltd (and details)
MM24	After Page 64	New Appendix 6	Entirely new appendix to be added with particulars of each site allocated in the Plan (see below)
MM25	After Page 64	New Appendix 7	Add new appendix: "Relationship between WLWP policies and previously adopted policies in Boroughs' DPDs" (see text below)

Appendix 6: Descriptions of Allocated Sites

[MM24]

Descriptions of each site allocated in the WLWP are provided below. The descriptions bring together information collected as part of the process of selecting these sites as well as that received during stages of consultation on the Plan.

General Information

Suitable waste management technologies

It is considered that the sites would be likely able to accommodate most non-landfill waste management technologies. Environment Agency permitting rules do not allow certain activities to operate within certain distances of a sensitive receptor, which includes a dwelling or workplace, under a standard permit.

Land Contamination

Each allocated site is located on previously developed land but no investigation has been carried out to establish whether the ground itself is contaminated³⁷. Redevelopment of the sites might therefore require work to decontaminate the sites.

Setting Back from Rivers

Where a site is adjacent to a river the Environment Agency has advised that a setback of a minimum of 8 metres from the top of the bank be incorporated into any redevelopment proposals. Setting back development from watercourses and providing an undeveloped buffer zone free from built structures is important for maintaining access to the river, to allow the riparian landowner access for routine maintenance activities and for the Environment Agency to carry out Flood Defence duties. It is also important that a sufficient wildlife and riverside corridor should be maintained to minimise the potential adverse impacts to the water quality and riverine habitats. This will provide opportunities for flood risk management in line with the Environment Agency Catchment Flood Management Plans. Opportunities for river restoration through the redevelopment of sites should also be encouraged which will also ensure compliance with requirements under the Water Framework Directive.

Air Quality Management Areas

All sites are located within Local Authority Air Quality Management Areas.

Waste Input tonnages

The input tonnages provided are taken from records provided by the Environment Agency Waste Data Interrogator for waste inputs for 2011. This information is only supplied for sites that hold an environmental permit and received waste during the course of that year.

³⁷ *In all cases, in light of current and previous uses it is possible that the sites might be classified as 'contaminated land' under the Environment Act 1995.*

Site Name	Twickenham Depot		
Site Ref. No.	342		
Locational Information			
Borough	Richmond Upon Thames	Site Area (hectares)	2.67
Easting	TQ 15163	Northing	73590
Site Address	Twickenham Central Depot, Langhorn Drive, Twickenham Middlesex, TW2 7SG		
Site Location	<i>To the north is the Harlequins Rugby ground (The Stoop). The land immediately abutting the northern edge of the Depot is an open tarmacked area (used for a hospitality marquee by Harlequins Rugby stadium on match days). To the North East is a 4 storey residential block fronting Langhorn Drive. To the east is public open space including a children's playground. To the south is a railway line and across the railway line is open space. To the west is the Duke of Northumberland's River (a branch of the River Crane) beyond which is a residential area (Conservation Area).</i>		
Neighbouring Uses (within 250 metres)	<i>The site is immediately adjacent to the Harlequins Rugby ground and stadium. A block of 4 storey residential apartments is located along Langhorn Drive to the north, and Richmond upon Thames College lies to the north east. A playing field with children's playground is located to the east. Allotments are just to the south of the railway line. To the west of the site, a residential area of detached houses is located on the opposite bank of the Duke of Northumberland's River (branch of the River Crane).</i>		
Planning Status	<i>The Depot site has been, amongst other things, used for the following purposes for in excess of 10 years:</i> <ul style="list-style-type: none"> • <i>Facilities for the parking of refuse and recycling vehicles</i> • <i>Material Recovery Facility and bulking facilities to support municipal recycling services.</i> 		
Allocation in Borough Local Plan	<i>The site is identified as a Proposals site in the London Borough of Richmond Site Allocations Plan for Council Depot facilities and continued waste management (TW 9). "To improve and rationalise the Council's existing depot facilities, and repositioning, intensification and improvement of the waste and recycling facilities." The adjacent Harlequins Site (TW8) and the Richmond upon Thames College site (TW10) are also identified.</i>		
Current Use	<i>Civic Depot hosting contractors for LB Richmond and some DSO staff and services, including a number of waste related operations. Waste related use includes bulking of: source separated and partially commingled kerbside collected recyclables, arboriculture wood/ green wastes, street cleansing waste and construction and demolition waste from pavement repairs. There are many buildings on site including prefabricated offices, a Victorian brick building, bulking bays, workshops and covered vehicle storage. There is a two storey detached house (owned by LB Richmond and occupied by former employees) located immediately adjacent to the boundary at the south of the site.</i>		

Current Vehicle Movements	<i>The site is currently accessed by employee's private vehicles and light vans and HGVs of various sizes.</i>
Current Waste Inputs	<i>This site was recently permitted (May 2013) but contractors operate under exemptions. Input tonnage not counted in existing capacity.</i>
Nominal potential throughput (tpa) (based on 65,000 per hectare)	<i>173,550 tpa.</i>
Environmental Considerations	
Access/Highway	<i>Primary access to the site is from the A316 along Langhorn Drive which is also used for access to Harlequins Rugby Club, Richmond College and residential properties. Access may also be gained from Craneford Way through a controlled gate.</i>
CCHP Potential	<i>The Site Allocations Plan identifies the Harlequins Site and the Richmond upon Thames College site as proposals sites which will have significant power requirements. A part of the site may be used for ancillary educational facilities or limited residential development and this might provide a heat load opportunity.</i>
Archaeology/Historic Interest	<i>There is a disused Victorian pump house in the middle of the site. This building is designated as a Building of Townscape Merit which would need to be retained, potentially constraining development. Lies within the Crane Valley Archaeological Priority Area.</i>
Ecology/HRA	<i>The site is greater than 1km from any internationally/nationally designated site. However parts of the Crane Valley are identified as a Local Site of Nature Conservation Importance.</i>
Flood Risk/Water Protection	<i>The site is not located within a Flood Zone. But as the site is greater than 1ha, a flood risk assessment that focuses on the management of surface water run-off will be required for any re-development.</i>
Green Belt/MOL	<i>The site is not in or near Green Belt. There is MOL (Metropolitan Open Land) to the south and east of the site and along the Duke of Northumberland's River to the west.</i>
Landscape/Visual Impact	<p><i>Existing buildings on the site range between 2 and 6 metres high. Apart from a small raised area in the middle of the site, the site is level with the surrounding area. There is a mixture of buildings, fencing and trees which offer partial or full screening of the site from all directions.</i></p> <p><i>Views of the site from the north would be from the Harlequins Rugby stadium, and a new 4 storey block of residential apartments on Langhorn Drive, and across open ground from Richmond College.</i></p> <p><i>Views of the site from the east can be gained across the open space and the access from Craneford Way. This may be obscured if the additional land on the eastern portion of the site were to be developed.</i></p> <p><i>Views of the site from the south would be screened by trees on the boundary and the undeveloped land south of the railway line designated as Public Open Space.</i></p> <p><i>Views of the site from the west would be partially screened by the vegetation and trees along the site boundary adjacent to the river.</i></p>

<i>Public Rights of Way (PRoW)</i>	<p><i>There are no PRoW crossing the site.</i></p> <p><i>The site is bounded by public footpaths including the River Crane path that provides pedestrian access to the Harlequins Stadium.</i></p>
Key Development Criteria	
<i>Archaeology</i>	<i>Proposals should be supported by a desk-based assessment unless agreed with English Heritage</i>
<i>Flood Risk/Water Protection</i>	<p><i>Redevelopment of this site is likely to require a Stage 2 Flood Risk Assessment. National Planning Practice Guidance advises that waste treatment is compatible with Floodzone 3a. Although the site is not within a Flood Zone, a flood risk assessment that focuses on the management of surface water run-off will be required.</i></p> <p><i>The Environment Agency has advised that a setback of a minimum of 8 metres from the top of the bank of the River Crane - a tributary of the River Thames - should be incorporated into any re-development proposals. Prior written consent will be required from the Environment Agency for any works within 8 metres of the River Crane and the Duke of Northumberland's River; this is irrespective of planning permission.</i></p>
<i>Access/Highway</i>	<i>Redevelopment of the site would need to pay particular attention to the site access along Langhorn Drive which is shared with the occupiers of residential dwellings and visitors to the rugby stadium (especially on match days). The emerging LB Richmond Site Allocations Plan recognises that any intensification of uses is likely to require the provision of a signalised junction between Langhorn Drive and the A316, subject to TfL approval. Vehicular access from Craneford Way should be kept to a minimum.</i>
<i>Archaeology/Historic Interest</i>	<i>Any new scheme would be required to retain the Victorian pump house; result in improvement and extension of the public open space adjoining the Duke of Northumberland River and the backdrop to the Craneford Way playing fields; and preserve or enhance the character or appearance of the Rosecroft Conservation Area.</i>

Site Name	Quattro Park Royal		
Site Ref. No.	328		
Locational Information			
Borough	Ealing	Site Area (hectares)	0.7
Easting	TQ 20931	Northing	82109
Site Address	Quattro Ltd, Park Royal, Regency Street (off Victoria Road), Park Royal NW10 6NR		
Site Location	The site is situated within the Park Royal Industrial Estate situated just off the A4000 (Victoria Road) adjacent to Old Oak Common rail sidings.		
Neighbouring Uses (within 250 metres)	The site adjoins a distribution depot to the north (this includes the handling of foodstuffs), a railway line runs along the eastern and southern boundary on an embankment and to the west is an office block and distribution warehouse. The nearest residential properties are approximately 40 metres away at Wells Road (East) with their gardens as close as 25 metres on the other side of the railway embankment.		
Planning Status	Permanent consent granted in 2001 on appeal for continued use of premises as waste transfer station (ref P/2000/0570). Site is within the Park Royal Opportunity Area. Site is subject to HS2 safeguarding (see paragraph 5.1.4).		
Allocation in Borough Local Plan	No		
Current Use	A construction materials distribution, concrete batching and waste bulking depot for excavation waste from utility works. There are two industrial units on site and several portacabins.		
Current Vehicle Movements	The site is currently accessed by HGVs delivering and removing materials and waste to the site plus employees' private vehicles.		
Current Waste Inputs	Input tonnage not counted in existing capacity as this is currently utilised for CDEW.		
Nominal potential throughput (tpa) (based on 65,000 per hectare)	45,000tpa		
Environmental Considerations			
Access/Highway	The site is accessed from the A4000 (Victoria Road.) Routing is via Victoria Road to the A40, a route carrying industrial estate traffic.		
Archaeology/Historic Interest	Acton Wells was a mineral bearing spring discovered in the 17th century but which ceased to be used from the 18th century. No apparent evidence of the spring onsite.		
	The site is less than 500m from local nature reserve Wormwood Scrubs.		
CCHP Potential	The site is located in a predominately light industrial area which may offer opportunities for use of space heating generated at the site. In the event that redevelopment associated with HS2 goes ahead there may be opportunities to redevelop adjacent land in a manner that allows for the use of any heat and power generated at this site.		

Ecology/HRA	<i>The site is greater than 1km from any internationally/nationally designated site.</i>
Flood Risk/Water Protection	<i>There are no open water bodies in proximity to the site.</i>
Green Belt	<i>The site is not in or near Green Belt.</i>
Landscape/Visual Impact	<p><i>Existing buildings on the site are around 6 metres high.</i></p> <p><i>Views of the site from the north would be obscured by the distribution warehouse.</i></p> <p><i>The site currently has 8-10 metre high boundary structures on the eastern boundary which combined with the railway embankment would reduce any potential impacts on the residential properties to the east beyond the railway line.</i></p> <p><i>Views of the site from the south would be obscured by a railway embankment.</i></p> <p><i>Views of the site from the west would be obscured by the office block/warehouse on the adjacent site.</i></p>
Public Rights of Way	<i>There are no PRoW crossing or adjacent to the site.</i>
Key Development Criteria	
Archaeology	<i>Applications involving groundworks should be supported by desk-based assessment, and may require evaluation trenching.</i>
Visual amenity	<i>Careful attention would be needed to avoid adverse impact on sensitive receptors formed by residential area at Wells House Road (East).</i>

Site Name	<i>Twyford Waste Transfer Station</i>		
Site Ref. No.	<i>352</i>		
<i>Locational Information</i>			
Borough	<i>Brent</i>	Site Area (hectares)	<i>1.24</i>
Easting	<i>TQ 19380</i>	Northing	<i>83461</i>
Site Address	<i>Twyford Waste & Recycling Centre, Abbey Road, Brent, NW10 7TJ</i>		
Site Location	<i>The site is located in a predominantly industrial area.</i>		
Neighbouring Uses (within 250 metres)	<i>The Paddington Branch of the Grand Union Canal, which is a navigable waterway, follows the south western boundary of the site divided by a 22 metre wide strip of land owned by the adjacent landowner. There are other industrial properties at varying distances to the north, east, south and west. The nearest residential properties are located 150m to the west of the site boundary beyond the industrial estates.</i>		
Planning Status	<i>The site benefits from a Certificate of Lawfulness for use as a waste transfer station (CLUD 92/1830). Site is within the Park Royal Opportunity Area.</i>		
Allocation in Borough Local Plan	<i>No</i>		
Current Use	<i>Waste Transfer Station (for trade waste, processing site for waste wood from WLWA) and Household Waste Site.</i>		
Current Vehicle Movements	<i>HGVs (including articulated lorries and Rollonoffs) and private vehicles currently deliver waste to the site. Waste is removed by articulated lorries and Rollonoffs.</i>		
Current Waste Inputs	<i>Input tonnage counted as 22,714 tpa in existing capacity.</i> <i>Site once operated as a transfer station with an approximate throughput of 125,000tpa.</i> <i>Maximum current capacity is estimated to be 85-90,000tpa.</i>		
Nominal potential throughput (tpa) (based on 65,000 per hectare)	<i>57,886 tpa (after deduction of existing capacity contribution)</i>		
<i>Environmental Considerations</i>			
Access/Highway	<i>The site has a dedicated 100m access onto Abbey Road near to the junction of the A406 North Circular Road.</i> <i>The Grand Union Canal follows the south western boundary of the site divided from the site by a 22 metre wide strip of land owned by the adjacent landowner.</i>		
Archaeology/Historic Interest	<i>Site contains no known archaeological sites.</i>		
CCHP Potential	<i>The site is adjacent to other industrial areas which may be able to utilise heat and power generated although no anchor load has been identified.</i>		

Ecology/HRA	<i>The site is greater than 1km from any internationally/nationally designated site.</i>
Flood Risk/Water Protection	<i>The Grand Union Canal follows the south western boundary of the site.</i>
Green Belt	<i>The site is not in or near Green Belt</i>
Landscape/Visual Impact	<p><i>The site is on a number of levels. Existing buildings on the site are no more than 10 metres high at the lower level. There is a 10m high structure on the highest part of the site.</i></p> <p><i>Views of the site from the north - across the north circular or Abbey Road are obscured by the old landfill mound.</i></p> <p><i>Views of the site from the south are obscured by large warehouse buildings on the adjacent site.</i></p> <p><i>Views of the site from the west are across the Grand Union Canal and from the residential area would be across an industrial area with chimney stacks.</i></p>
Public Rights of Way	<i>There are no PRow crossing or immediately adjacent to the site. The Grand Union Canal Walk runs along the opposite side of the Grand Union Canal with views into the site.</i>
Key Development Criteria	
Flood Risk	<i>The site is greater than 1ha and so a flood risk assessment that focuses on the management of surface water run-off will be required.</i>
Neighbouring Land Uses	<i>Proposals should carefully consider existing and proposed neighbouring land uses and ensure that any development will not result in any significant adverse impact on these uses. In particular, such impacts will include those which might arise from the construction and operation of the site and the movement of vehicles associated with any proposal.</i>

Site Name	Veolia/Brent Transfer Station, Marsh Road		
Site Ref. No.	1261		
Locational Information			
Borough	Brent	Site Area (hectares)	2.71
Easting	TQ 17784	Northing	83085
Site address	Veolia Waste Transfer Station, Marsh Road, Wembley, HA0 1ES		
Site Location	This site is located in the Alperton Lane Industrial Estate and borders the River Brent, a railway line, Alperton Lane, a scrap yard and another waste facility.		
Neighbouring Uses (within 250 metres)	There is housing 170 metres to the north west of the site across Alperton Lane and 130 metres to the south. There are sports fields on the other side of Alperton Lane. A railway line runs past the southern corner of the site. The site is above the River Brent which runs adjacent to the south eastern boundary. There are industrial areas immediately to the west and east of the site.		
Planning Status	94/1413 Erection of single detached building in connection with the use of the site as a waste transfer station.		
Allocation in Borough Local Plan	Site is a designated site in the 'saved' Brent UDP as a 'Waste Management Manufacturing Area'.		
Current Use	Permitted Waste Transfer Station plus Vehicle Depot for Veolia refuse vehicle fleet serving Westminster & Camden collection contracts and salt store serving Westminster, Camden and Brent. There are existing, large waste transfer station buildings on site, and open hard stand areas for storage and vehicle depot facilities. Existing building heights are approximately 10-18 metres.		
Current Vehicle Movements	Waste is delivered to the site in refuse vehicles and removed in articulated HGVs.		
Current Waste Inputs	Input tonnage 82,691 tpa counted in existing capacity.		
Nominal potential throughput (tpa) (based on 65,000 per hectare)	93,459 tpa (after deduction of existing capacity contribution)		
Environmental Considerations			
Access/Highway	<p>The site is close to strategic roads A4005, A40 and A406. The site is currently accessed from the A4005 from Alperton Lane and then along Marsh Road which runs through an industrial estate including another waste transfer station. The site has in the past been accessed directly from Alperton Lane.</p> <p>The River Brent runs along the southern boundary of the site, being a small tributary running from Brent Reservoir to the River Thames at Brentford.</p>		
Archaeology/Historic Interest	No internationally or nationally designated site present. There is potential for palaeo – environmental remains alongside the River Brent.		
CCHP Potential	The site is adjacent to other industrial areas which may be able to utilise heat and power generated.		

Ecology/HRA	<i>Site is within 250m of a SINC designated in the Ealing Local Plan which is of Grade 1 Borough Importance. It forms part of the much larger 'Brent River Park: Hanger Lane to Greenford Line' SINC (site 15/EaBI14A).</i>
Flood Risk/Water Protection	<i>Southern boundary is adjacent to the River Brent</i>
Green Belt	<i>The site is not in or near Green Belt</i>
Landscape/Visual Impact	<p><i>The site is level with the surrounding area. Existing buildings on the site are between 10 and 18 metres high which is in keeping with heights of buildings on adjacent land.</i></p> <p><i>Distant views from the north would be across the open Alperton Sports Ground.</i></p> <p><i>Views from the east would be from Marsh Lane and would be obscured by light industrial units.</i></p> <p><i>Views from the south would be from low and high rise office space with views from the residential area obscured by the railway embankment.</i></p>
Public Rights of Way	<i>The pedestrian pavement of Alperton Lane runs adjacent to the site's northern boundary.</i>
Key Development Criteria	
Archaeology	<i>Proposals should be supported by a desk-based assessment unless agreed with English Heritage</i>
Flood Risk/Water Protection	<i>The site is greater than 1ha and so a flood risk assessment that focuses on the management of surface water run-off will be required. The Environment Agency advises a setback of a minimum of 8 metres from the top of the bank of the River Brent must be incorporated into re-development proposals. The site boundary is itself over 8 metres from the bank.</i>
Visual amenity	<i>Careful attention would be needed to avoid adverse impact on sensitive receptors including the sports fields to the north of the site.</i>
Access	<i>Any redevelopment would need to pay particular attention to impacts on Marsh Lane which can be constricted due to vehicles parking on this highway.</i>

Site Name	Greenford Reuse & Recycling Site & Greenford Depot, Greenford Road		
Site Ref. No.	309 & 310		
Locational Information			
Borough	Ealing	Site Area (hectares)	1.78
Easting	TQ 14334	Northing	81848
Site Address	Greenford Road Reuse and Recycling Centre & Greenford Depot, Greenford Road, Middlesex, UB6 9AP		
Site Location	The site is adjacent to the Greenford Bus Depot and near to Brent River Park.		
Neighbouring Uses (within 250 metres)	There is a bus depot adjacent to the northern boundary of the site. The River Brent runs along the south-eastern boundary. Beyond the river is Brent River Park Metropolitan Open Land (MOL). There are residential properties to the west (separated from the site by a large bus maintenance garage) and also a school to the north of site.		
Planning Status	Consent granted in 1973 for waste use. More recent consents have however been granted. These include: P/2000/4510 (completed 2004) - The erection of building for paper and leather storage and two additional bays for storage of paper and glass for recycling. P/2005/2560 (completed 2006) - The installation of a new organic waste recycling facility enclosure.		
Site Identified in Borough Local Plan?	Redevelopment of Greenford Depot is covered by policy 4.3 of Ealing Development (Core) Strategy.		
Current Use	<p>Part of the site is a raised split level household waste recycling centre, located in the north-eastern corner. The recycling centre includes a three-sided covered tipping and bulking area (10 metres high from site level 15 metres from ground level) and the remainder of the site is open. Commercial waste may also be tipped at the re-use and recycling centre.</p> <p>The adjacent depot site incorporates various Ealing Council services including the Ealing Council highways services, street cleansing, grounds maintenance and refuse vehicle depot. The majority of the allocated depot site is used for open storage of refuse vehicles. There are two waste/recycling bulking areas: a small open one and a larger enclosed area. Baling of recyclable materials takes place on the depot site. Building heights range from approx. 3-8 metres.</p>		
Current Vehicle Movements	At peak periods approximately 600 vehicles deliver waste to the re-use and recycling centre which can cause vehicles to queue back to, and onto, the main highway. Approximately 30% of the waste deliveries is from commercial sources including transit vans and small lorries. These movements are additional to those associated with the depot including the waste use.		
Current Waste Inputs	<p>The re-use and recycling and recycling centre handles approximately 15,000 tonnes of waste per annum.</p> <p>The depot receives source segregated and comingled recyclables from recycling rounds. In total approximately 30,000 tonnes per annum of</p>		

	<p>food waste and bulky waste is also brought into the depot.</p> <p>Combined input tonnage 35,610 tpa is counted in existing capacity.</p>
Nominal potential throughput (tpa) (based on 65,000 per hectare)	80,285 tpa (after deduction of existing capacity contribution)
Environmental Considerations	
Access/Highway	The nearest strategic road (A40) is over a mile away to the north with access via Greenford Road (a busy thoroughfare). The Depot and Re-use and Recycling Centre have separate entrances onto the shared access road which are adjacent to each other. The access onto the highway is shared with the bus depot to the north of the site. The entrances are lower than the main highway.
Archaeology	The site is located within the Brent River Valley Archaeological Interest Area as defined in Ealing Local Plan with some potential for palaeo-environmental remains but largely former landfill.
CCHP Potential	There are industrial areas adjacent to the site.
Ecology/HRA	The site is greater than 1km from any internationally/nationally designated site.
Flood Risk/Water Protection	Site within Flood Zone 2
Green Belt	The site is not in or near Green Belt.
Landscape/Visual Impact	There are sensitive receptors in proximity to the site in the form of residential areas and the River Brent Park. Current noise impact has been mitigated by erection of an acoustic barrier along north eastern boundary to the rear of bays.
Public Rights of Way	A PRoW runs alongside the River Brent on the opposite bank but diverts away before it passes the main body of the depot.
Key Development Criteria	
Archaeology	Proposals should be supported by a desk-based assessment unless agreed with English Heritage
Flood Risk/ Water Protection	A setback of a minimum of 8 metres from the top of the bank of the River Brent must be incorporated into re-development proposals. The site is greater than 1ha and so a flood risk assessment that focuses on the management of surface water run-off will be required.
Visual and amenity impact	Redevelopment of the site would need to consider views of the site from the River Brent Park in particular. Policy 7D of Ealing Development Management DPD expects a buffer strip to be provided around existing or proposed open spaces. The depth of the buffer is to be determined having regard to the particular circumstances of the site and the open space, but would typically be in the region of 5-10m (see para. E7.D.5). Policy 2.18 of the same document is also relevant as regards views to and from open space. In addition impact on residential uses including noise would need to be mitigated.
Highways	Any redevelopment should seek to mitigate the current congestion on the highway which occurs at peak times.

Site Name	Council Depot, Forward Drive		
Site Ref. No.	222		
Locational Information			
Borough	Harrow	Site Area (hectares)	1.83 ¹
Easting	TQ 15830	Northing	89266
	Harrow Council Depot, Forward Drive, Harrow, HA3 8NT		
Site Location	The site is located directly adjacent to the Forward Drive Civic Amenity (CA) Site.		
Neighbouring Uses (within 250 metres)	A residential area of two storey dwellings lies immediately to the north of the site. To the east there is a religious temple and a school across Kenmore Avenue. To the south is a railway line which runs on an embankment above the level of the site. Beyond the railway line are prominent industrial units.		
Planning Status	Various permissions depending on Unit No and inclusion of adjacent CA site. Secure Parking Area On Site Of Garages & Loading Platform With Fencing & Lighting EAST/477/01/LA3 Granted 09/07/2001. (Unit 1). Change Of Use: Warehouse Storage To Training Facility And Alterations Including: Fire Escape Canopy Disabled Ramps Bin Enclosure & New Pedestrian Access To Kenmore Avenue (unit 4) Granted 11/02/2005.		
Allocation in Borough Local Plan	Allocated for waste management and depot functions.		
Current Use	The site comprises a current council works depot and base for other Harrow Council services. The site has a mixture of vehicle workshops, open hard stand areas, car parking, office blocks and other buildings varying in size and construction.		
Current Vehicle Movements	The site is very busy and there is a range of HGVs entering the site as well as school buses and private vehicles. At peak periods vehicles visiting the adjacent household waste recycling site queue back to the main road which hinders access to the depot.		
Current Waste Inputs	The Depot site has a registered exemption which recognises existing limited waste inputs. The household waste site and WTS component input tonnage of 25,780 tpa is already counted toward the apportionment so is discounted from overall capacity contribution.		
Nominal potential throughput (tpa) (based on 65,000 per hectare)	124,370tpa		

¹ This represents the portion of the depot site which may be redeveloped with the CA/WTS site immediately to the west.

Environmental Considerations	
Access/Highway	<i>The nearest strategic road is the A409 with the routing via residential/commercial areas. Emergency access is from Kenmore Avenue.</i>
Archaeology/Historic Interest	<i>No internationally or nationally designated site present.</i>
CCHP Potential	<i>There are industrial areas adjacent to the site.</i>
Ecology/HRA	<i>The site is greater than 1km from any internationally/nationally designated site.</i>
Flood Risk/Water Protection	<i>There are no open water bodies in proximity to the site.</i>
Green Belt	<i>The site is not in or near Green Belt.</i>
Landscape/Visual Impact	<i>The site is generally well screened. Acoustic screening has been erected between the residential area in the north and the adjacent CA site. This screening does not currently extend along the northern boundary of the depot where normal fencing is in place.</i>
Public Rights of Way	<i>There are no PRow crossing or immediately adjacent to the site.</i>
Key Development Criteria	
Local amenity	<i>Development of a waste facility on site would need to result in an overall improvement to the existing levels of amenity (noise, odour and dust emissions) experienced by neighbouring uses, especially the residential area to the north of the site, through enclosing any new facility, as well as the existing civic amenity facility.</i>
Access	<i>Redevelopment of the site would need to take into account the cumulative congestion created by vehicles entering the depot and the adjacent household waste recycling site. Proposals would need to provide for adequate circulation arrangements within the site. There is scope for one way routing to be established on approach roads for HGVs.</i>

Site Name	<i>Western International Market</i>		
Site Ref. No.	2861		
Locational Information			
Borough	<i>Hounslow</i>	Site Area (hectares)	<i>3.2</i>
Easting	<i>TQ 5109</i>	Northing	<i>1785</i>
Site Address	<i>Western International Market, Southall, UB2 5XH</i>		
Site Location	<i>Site is located in an industrial area to the northeast of Junction 3 of the M4 motorway. The site is located to the south of Hayes Road and to the west of Southall Lane. To the north of Hayes Road is Bulls Bridge Industrial Estate.</i>		
Neighbouring Uses (within 250 metres)	<i>There is a raised soil embankment on the southern site boundary and no buildings currently overlooking the site. The land to the west has been developed in association with the redevelopment of Western International Market which sells food and horticultural produce, open land to south, and industrial/retail areas to the east and north with the most proximal use being Costco and data centre. The M4 is audible from the site.</i>		
Planning Status	<i>In March 2006, planning permission was granted subject to a legal agreement which provided for the demolition of buildings on the site and development of a wholesale horticultural market with offices, food wholesale facilities, loading bays, storage areas, associated buildings, ancillary facilities and surface car parking to the west of the site. This included the provision of a public weekend market and development of an employment building (B1, B2, and B8 uses) with associated car parking, loading and access (Ref No: 01032/E/25).</i>		
Allocation in Borough Local Plan	<i>No</i>		
Current Use	<i>The large site comprises land which is level and undeveloped. The international market has been demolished, so the site is clear of any buildings or other structures.</i>		
Current Vehicle Movements	<i>None</i>		
Current Waste Inputs	<i>None</i>		
Nominal potential throughput (tpa) (based on 65,000 per hectare)	<i>208,000 tpa</i>		
Environmental Considerations			
Access/Highway	<i>The site has very good access to strategic roads A312 and M4 via Hayes Road which is primary road.</i>		
Archaeology/Historic Interest	<i>Major prehistoric/Saxon site excavated to northwest. The Brentford Fountain Western International Market - a Grade II Listed Monument is adjacent to the site.</i>		
CCHP Potential	<i>There are industrial areas adjacent to the site.</i>		

Ecology/HRA	<i>The site is greater than 1km from any internationally/nationally designated site.</i>
Flood Risk/Water Protection	<i>There are no open water bodies in proximity to the site.</i>
Green Belt	<i>The Site is adjacent to Green Belt</i>
Landscape/Visual Impact	<i>The site is in an industrial/retail setting and so there are few sensitive receptors. There is at least one gas holder in the vicinity of the site that forms a prominent landmark and draws the eye when viewing the site from the south.</i>
Public Rights of Way	<i>There are no PRow crossing or immediately adjacent to the site.</i>
Key Development Criteria	
Archaeology	<i>Applications involving groundworks should be supported by desk-based assessment, and likely to require evaluation trenching.</i>
Flood Risk/Water Protection	<i>The site is greater than 1ha and so a flood risk assessment that focuses on the management of surface water run-off will be required.</i>
Visual amenity	<i>Some screening of the site would be required depending on the nature and scale of any development. Particular attention would need to be paid to building siting, materials, height, design and landscaping so as to be sympathetic to the adjacent Green Belt.</i>
Neighbouring Land Uses	<i>Proposals should carefully consider existing and proposed neighbouring land uses and ensure that any development will not result in any significant adverse impact on these uses. In particular, such impacts, including those on air quality, will include those which might arise from the construction and operation of the site and the movement of vehicles associated with any proposal.</i>

Site Name	Rigby Lane Waste Transfer Station		
Site Ref. No.	331		
Locational Information			
Borough	Hillingdon	Site Area (hectares)	0.91
Easting	TQ 082	Northing	798
Site Address	Sita Uk Ltd, 1 Rigby Lane, Hayes, Middlesex, UB3 1ET		
Site Location	The site is located within an established industrial estate approximately 1.3 kilometres south west of Hayes town centre, 1.3 kilometres north of the M4 Motorway and south of the Grand Union Canal.		
Neighbouring Uses (within 250 metres)	The site is surrounded immediately to the north, east and west by commercial/industrial units. To the south it adjoins an elevated section of land occupied by Crossrail and the existing railway. To the north of the site is the Grand Union Canal. The nearest residential housing is approximately 70m away beyond the railway embankment. The northern boundary of the site faces onto the main access road (Rigby Lane) to the industrial estate. Across the road is an industrial unit and beyond that a band of trees shields the Grand Union Canal from view. The surrounding building heights vary greatly between 3-35m high with a concrete batching plant circa 15m high in view from the site.		
Planning Status	Planning permission exists for waste management comprising a Waste Transfer Station and overnight parking for goods vehicles. The existing permission also consents operation of a Civic Amenity Site (CA) in the north-western corner of the site, although this has not been implemented.		
Allocated in Borough Local Plan	No		
Current Use	The site currently operates as a waste management facility comprising a Waste Transfer Station (WTS). The Transfer Station building is approximately 8 metres in height. There is also an office building and weighbridge on site. The site has been operating as a waste facility for over two decades and did until 2008 operate a dual facility including a CA site for members of the public.		
Current Vehicle Movements	The site is accessed by HGVs and employee's private vehicles. N.B. There is no planning condition that limits the number of vehicle movements that may be used to deliver waste.		
Current Waste Inputs	Input tonnage 25,280 tpa counted in existing capacity. Existing planning condition limiting daily inputs to 1,030 tonnes.		
Nominal potential throughput (tpa) (based on 65,000 per hectare)	33,870 tpa (after deduction of existing capacity contribution).		
Environmental Considerations			

Access/Highway	<i>Vehicular access to the site is from three priority junctions that connect onto Rigby Lane at the site's north-eastern and north-western boundaries. The north-eastern boundary of the site is currently designed to accommodate vehicular traffic movements associated with the WTS whilst the north-western access combines public access to the consented (as yet unbuilt) CA alongside HGV ingress for permitted CA collections. Egress by HGVs collecting from the CA occurs from the WTS access.</i>
Archaeology/Historic Interest	<i>Lies in vicinity of significant Palaeolithic finds.</i>
CCHP Potential	<i>There are industrial areas adjacent to the site.</i>
Ecology/HRA	<i>The site is greater than 1km from any internationally/nationally designated site.</i>
Flood Risk/Water Protection	<i>There are no open water bodies in proximity to the site. Grand Union Canal across the road & Stockley Road lake is to south west.</i>
Green Belt	<i>The site is near (55m) to Green Belt north of the Grand Union Canal.</i>
Landscape/Visual Impact	<i>The site is not overlooked by sensitive receptors. Tall structures including concrete batching plant visible from site.</i>
Public Rights of Way	<i>The pedestrian pavement of Rigby Lane runs alongside the road adjacent to the main access road.</i>
Key Development Criteria	
Archaeology	<i>Proposals should be supported by a desk-based assessment unless agreed with English Heritage</i>
Landscape/Visual Impact	<i>The site falls within a height restriction zone with limits applied.</i>

Appendix 7 - Relationship between WLWP policies and previously adopted policies in Boroughs' DPDs [MM25]

The following tables show how the policies of the West London Waste Plan have superseded previously adopted policies contained in the six constituent Boroughs' Development Plan Documents.

London Borough of Brent

Superseded Policy in Core Strategy (Adopted 2010)		Replacement West London Waste Plan Policy	
Policy No.	Policy Title	Policy No.	Policy Title
N/A	N/A	N/A	N/A

Brent Unitary Development Plan (UDP), 2004 (Planning Policy Relevant in Brent, June 2011)³⁹		Replacement West London Waste Plan Policy	
Policy No.	Policy Title	Policy No.	Policy Title
W3	New Waste Management/ Manufacturing Proposals – Environmental and Access Criteria	WLWP 4	Ensuring High Quality Development
W4	Waste Management / Manufacturing Areas	WLWP 3	Location of Waste Development
W5	Safeguarding of Waste Facilities	WLWP 2	Safeguarding and Protection of Existing and Allocated Waste Sites
W6	Proposals for Waste Management Facilities outside Waste Management/Manufacturing Areas	WLWP 3	Location of Waste Development
W11	Waste Transfer Facilities/Waste to Landfill	WLWP 4	Ensuring High Quality Development

³⁹ Some of the policies in the Brent UDP (adopted in 2004) still make up part of the development plan for Brent. A Development Management Development Plan Document (DPD) will replace the remaining saved UDP policies once adopted. Consultation took place from 20 June to 31 July 2014. Development will need to be in accordance with the relevant development management policies of the UDP policies and in due course the Development Management DPD.

Superseded Policy in Site Specific Allocations DPD July 2011		Replacement West London Waste Plan Policy	
Policy No.	Policy Title	Policy No.	Policy Title
N/A	N/A	N/A	N/A

London Borough of Ealing

<i>Superseded Policy in Local Plan Core Strategy (Adopted April 2012)</i>		<i>Replacement West London Waste Plan Policy</i>	
<i>Policy No.</i>	<i>Policy Title</i>	<i>Policy No.</i>	<i>Policy Title</i>
<i>1.2 (i)</i>	<i>Delivery of the Vision for Ealing 2026 (clause (i))</i>	<i>WLWP 2</i>	<i>Safeguarding and Protection of Existing and Allocated Waste Sites</i>
		<i>WLWP 3</i>	<i>Location of Waste Development</i>
		<i>WLWP 4</i>	<i>Ensuring High Quality Development</i>
		<i>WLWP 5</i>	<i>Decentralised Energy</i>
		<i>WLWP 6</i>	<i>Sustainable Site Waste Management</i>
		<i>WLWP 7</i>	<i>National Planning Policy Framework: Presumption in Favour of Sustainable Development</i>

London Borough of Harrow

The table below lists the relevant waste policies of the Harrow Unitary Development Plan (2004) that were deleted by the Secretary of State on 28th September 2007 and those deleted upon the adoption of the Harrow Development Management Policies DPD on 4th July 2013.

<i>Policy</i>	<i>Title</i>	<i>Date of Deletion</i>
<i>SEP3</i>	<i>Waste General Principles</i>	<i>28th September 2007</i>
<i>EP16</i>	<i>Waste Management, Disposal and Recycling</i>	<i>4th July 2013</i>
<i>EP17</i>	<i>Waste Generating Activities</i>	<i>28th September 2007</i>
<i>EP18</i>	<i>Landfilling</i>	<i>28th September 2007</i>
<i>EP19</i>	<i>Aggregates</i>	<i>28th September 2007</i>
<i>D8</i>	<i>Storage of Waste, Recyclable and Reusable Materials in New Development</i>	<i>28th September 2007</i>

<i>Superseded Policy in the Harrow Core Strategy (Adopted 16th February 2012)</i>		<i>Replacement West London Waste Plan Policy</i>	
<i>Policy No.</i>	<i>Policy Title</i>	<i>Policy No.</i>	<i>Policy Title</i>
<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>

<i>Superseded Policy in the Harrow Development Management Policies DPD (Adopted 4th July)</i>		<i>Replacement West London Waste Plan Policy</i>	
<i>Policy No.</i>	<i>Policy Title</i>	<i>Policy No.</i>	<i>Policy Title</i>
<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>

<i>Superseded Policy in the Harrow & Wealdstone Area Action Plan DPD (Adopted 4th July)</i>		<i>Replacement West London Waste Plan Policy</i>	
<i>Policy No.</i>	<i>Policy Title</i>	<i>Policy No.</i>	<i>Policy Title</i>
<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>

<i>Superseded Policy in the Harrow Site Allocations DPD (Adopted 4th July)</i>		<i>Replacement West London Waste Plan Policy</i>	
<i>Policy No.</i>	<i>Policy Title</i>	<i>Policy No.</i>	<i>Policy Title</i>
<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>

London Borough of Hillingdon

<i>Superseded Policy in Local Plan Strategic Policies (Adopted November 2012)</i>		<i>Replacement West London Waste Plan Policy</i>	
<i>Policy No.</i>	<i>Policy Title</i>	<i>Policy No.</i>	<i>Policy Title</i>
<i>EM11</i>	<i>Sustainable Waste Management</i>	<i>WLWP 2</i>	<i>Safeguarding and Protection of Existing and Allocated Waste Sites</i>
		<i>WLWP 3</i>	<i>Location of Waste Development</i>
		<i>WLWP 4</i>	<i>Ensuring High Quality Development</i>
		<i>WLWP 5</i>	<i>Decentralised Energy</i>
		<i>WLWP 6</i>	<i>Sustainable Site Waste Management</i>
		<i>WLWP 7</i>	<i>National Planning Policy Framework: Presumption in Favour of Sustainable Development</i>

London Borough of Hounslow

<i>Superseded Policy in Unitary Development Plan (December 2003)</i>		<i>Replacement West London Waste Plan Policy</i>	
<i>Policy</i>	<i>Policy Title</i>	<i>Policy</i>	<i>Policy Title</i>

No.		No.	
ENV-P.2.2	Landfill	WLWP 3	Location of Waste Development
ENV-P.2.1	Waste management	WLWP 6	Sustainable Site Waste Management
ENV-P.2.3	Waste management facilities	WLWP 2	Safeguarding and Protection of Existing and Allocated Waste Sites

London Borough of Richmond

Saved Policy in the Unitary Development Plan (Adopted 2005)		Replacement West London Waste Plan Policy	
Policy No.	Policy Title	Policy No.	Policy Title
CCE22	Waste Collection and Disposal	WLWP 2	Safeguarding and Protection of Existing and Allocated Waste Sites
		WLWP 3	Location of Waste development
		WLWP 4	Ensuring High Quality Development
		WLWP 5	Decentralised Energy
		WLWP 6	Sustainable Site Waste Management
		WLWP 7	National Planning Policy Framework: Presumption in Favour of Sustainable Development

Core Strategy (Adopted 2009)		Replacement West London Waste Plan Policy	
Policy No.	Policy Title	Policy No.	Policy Title
CP6	Waste	WLWP 2	Safeguarding and Protection of Existing and Allocated Waste Sites
		WLWP 3	Location of Waste development
		WLWP 4	Ensuring High Quality Development
		WLWP 5	Decentralised Energy
		WLWP 6	Sustainable Site Waste Management
		WLWP 7	National Planning Policy Framework: Presumption in Favour of Sustainable Development

LONDON BOROUGH OF HARROW

CABINET – 23 APRIL 2015

REFERENCE FROM OVERVIEW AND SCRUTINY COMMITTEE – 14 APRIL 2015

WEST LONDON WASTE PLAN

The Committee received a report of the Corporate Director of Environment and Enterprise on the outcome of the Public Examination of the joint West London Waste Plan. It was noted that the officers had requested Cabinet Members to recommend the adoption of the West London Waste Plan to Full Council.

The Portfolio Holder for Business, Planning and Regeneration outlined the background to the formation of the Plan and highlighted that it was a planning document and part of the Local Plan. The main principle was to establish the amount of waste in the area and safeguard sites for waste facilities. The Forward Drive Depot was the only site affected in Harrow, the boundary for which had been amended as a result of the prior adoption of the Area Action Plan.

In response to questions, the Portfolio Holder stated that:

- should Harrow decide not to adopt the West London Waste Plan, the Council would be required to produce its own Plan which would apply to the Forward Drive Depot only and would not be integrated with other Councils;
- the targets were set by the London Plan;
- the effect of the introduction of the caddy and brown bins on the percentage recycled was a matter for environment services and not planning officers. The planning perspective was to ensure the safeguarding of sites to meet projected need by ensuring that the land was not developed;
- Harrow was the second best performing London Borough in terms of percentages for recycling and composting;
- the West London Waste Authority (WLWA) had responsibility for decisions as to what waste was sent to landfill.

The Chairman thanked the Portfolio Holder and Planning Policy Officer for their attendance.

RESOLVED: That

1. the outcome of the independent Examination in Public of the West London Waste Plan be noted;
2. that the Portfolio Holder for Business, Planning and Regeneration be notified as soon as practicable when the post-adoption statutory requirements for the West London Waste Plan have been complied with;
- 3. that Cabinet be informed of the comments made by the Committee**

Background Documents:

Draft minutes of the Overview and Scrutiny Committee – 14 April 2015

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Scrutiny Annual Report 2014-2015



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Introduction

This report summarises some of our most important achievements this year, the first year of a new four year cycle of scrutiny work following the local elections in May 2014. The election also saw a large turnover in the number of Councillors, with around half of those elected being elected for the first time. That means that, this year, we have a rich mix of Councillors new to Scrutiny and experienced in Scrutiny work which has helped to bring new perspectives to our work.

The big issue continues to be the serious financial difficulties we face and the fact that the Council is required to deliver a further £82m of savings over the next four years. The impact of reductions on this scale will be felt by residents, so the role of scrutiny in championing the needs of our most vulnerable residents has never been more important. That is why our first review this year was of the Council's Council Tax Support Scheme. It is also the reason why Scrutiny has received four major public petitions for consideration this year.

However, the resources supporting the Council's scrutiny function have not been immune from the budget savings and were also reduced and reorganised in 2014. The new work programme that was agreed in September reflects this decrease in capacity, so it is crucial that our activities are targeted on the most important issues, where we can have a real and meaningful impact and that we use the most effective means of undertaking our investigations. Scrutiny can add real value to the work of the Council. We fervently believe that by engaging scrutiny early in the process of policy development, we can bring extra capacity, challenge, ideas and experience to the debate that would ultimately lead to better outcomes for our residents. We will continue to encourage the executive and officers to engage with scrutiny earlier in the decision-making process.

As in previous years, the Scrutiny Leadership Group, comprising the chairs and vice-chairs of the committees and scrutiny leads, continues to provide strategic direction to the scrutiny function and is helping to ensure we maintain an effective focus for our work. We are extremely grateful to all of the councillors who have contributed to the Leadership Group this year.

The two scrutiny sub-committees continue to play a key role in our deliberations:

- The Performance and Finance Sub-Committee's focus on the performance and finances of the organisation continues to provide an excellent steer to our deliberations.
- The Healthy and Social Care Sub-Committee maintains a determined oversight of the activities of our health partners as they undergo similar significant change and budget challenges.

Reports from both of the Sub Committees and the Call-In Committees are included below. Similarly, this report also includes a summary of the work undertaken by each of the lead councillor pairs and the major reviews we have undertaken.

We have got off to a great start and have already achieved a huge amount in a short space of time this year. Thank you to everyone who has contributed. And if you have any suggestions for issues that you think scrutiny should look into, please do let us know.



Cllr Jerry Miles
Chair of Overview & Scrutiny



Cllr Paul Osborn
Vice Chair of Overview &
Scrutiny

Report from the Overview and Scrutiny Committee

Our Committee

The committee has met 10 times this year. The papers and details of the outcomes from all of these meetings can be found [here](#).

Our remit continues to be the consideration of the Council's and our partners' strategic direction and major projects and policy decisions and we are grateful for the support we have received in doing this from portfolio holders, council officers and representatives from partner agencies. A full list of the portfolio holders who have supported our Committee's discussions is given at the end of this section of the annual report.

Our Meetings

During the course of the year we have, as in previous years, met with the Leader of the Council, the Finance Portfolio Holder, the Interim Head of Paid Service and the Finance Director for a question and answer session to consider the budget proposals (in January). We are grateful for the information which they shared with us. This year we have also received four major petitions as references from Cabinet for consideration. These were on:

- Cambridge Road Car Park
- Harrow Arts Centre
- Harrow Museum
- Cuts to Park Services – Pinner Memorial Park

The specific items which have been considered at ordinary meetings of our Committee include:

- Corporate Plan
- Community Safety Plan
- Youth Justice Plan and the Youth Offending Team Inspection
- Progress towards national procurement standards
- The impact of the Outer London Fund on Harrow town centre
- Children's services self-assessment & Child Sexual Exploitation
- Project Minerva (back office restructuring) and IT contract re-tendering
- Scrutiny Work Programme
- Implementation of Universal Credit
- Implementation of the Care Act
- How well is the Council doing at being a Public Health Authority
- Introduction of universal free school meals to infant schools
- West London Waste Plan

Review Programme

We have started a new programme of more detailed scrutiny investigations, undertaken mainly via in-depth reviews or challenge panels. The content of the review programme is identified through the Performance and Finance Sub-Committee's deliberations or via our

scrutiny leads and is discussed at the Scrutiny Leadership Group and then agreed by the Overview and Scrutiny committee.

This year we have conducted four reviews:

- a. Council Tax Support Scheme Challenge Panel – Chaired by Cllr Barry Macleod-Cullinane
- b. The Funding Challenge: Saving £75m from the Council’s Budget Challenge Panel – Chaired by Cllr Pamela Fitzpatrick
- c. Capital Expenditure Challenge Panel – Chaired by Cllr Barry Kendler
- d. Libraries review Challenge Panel joint with Ealing Council – Chaired by Cllr Paul Osborn.

We have been helped in our work by members of the public, the voluntary and community sector, other Councils and organisations, Members and officers and in particular the staff of the Policy Team. We would like to thank all of them for their time, evidence, research and constructive way in which they have engaged with the scrutiny of the Council.

a. Council Tax Support Scheme Challenge Panel

As part of the Spending Review 2010, the Government announced that it would localise support for Council Tax Benefit (CTB) from 2013/14, passing that budget over to local government but at a level 10% less than the CTB grant. Local Authorities were required to set up localised Council Tax Support (CTS) Schemes to provide support to low income households liable for council tax for implementation from 1 April 2013. In light of proposed changes to Harrow’s current CTS Scheme, the Scrutiny Leadership Group decided to review both the Scheme and the implications of the proposed changes recently consulted on. The CTS Scheme Challenge Panel took place on the 27th October 2014.

The Challenge Panel gathered substantial evidence, heard from and questioned several key witnesses and considered evidence put before them to understand the impact of the Council’s current CTS Scheme upon those residents affected by it. The Panel had particular regard to the impact Harrow’s CTS Scheme is having on household debt. The Panel also sought to assess the likely impact of the Administration’s proposed changes so as to produce a report that could inform councillors deliberating in both Cabinet and at full Council on implementing proposed changes to the CTS Scheme.

The Panel’s key findings and unanimous recommendations were grouped by the following themes:

- Consultation
- Harshes Scheme in the Country
- Recovery, Collection Rates and Enforcement
- Access and Customer Service
- Mitigating the Impact

The Panel recommend that the Council overall makes a decision to prioritise alternative spending cuts above reductions to CTS, but that, whatever the final state of the Scheme, to consider the series of important recommendations on consultation, collections, and the hardship fund. The Panel's aim was to both lessen the impact of Harrow's current extremely harsh CTS Scheme and to mitigate the impact of the proposed changes of the Scheme on some of our most vulnerable residents.

Whilst Scrutiny is pleased that as a result of this review, further detrimental changes to the scheme were not made, we are disappointed that recommendations to improve the incentives to work by reducing the minimum payment for working age claimants and reducing the taper were not accepted.

b. The Funding Challenge: Saving £75m from the Council's Budget

It is clear that the next few years will see big budgetary challenges for Harrow Council. It is essential that Harrow Council's budget-setting process and other associated processes are as effective as possible at enabling Harrow to rise to the financial challenges ahead.

Incremental Budgeting uses the last year's budget as a starting point, and makes incremental changes according to new legislative requirements, additional or reduced resources, service developments, anticipated price inflation and labour costs. This approach has helped Harrow to make significant savings to date but it is less well suited to scrutinising the cost and effectiveness of spending. Further, since departments consider spending reductions separately, cross-departmental efficiencies are likely being overlooked.

The Challenge Panel supports the ideas of reform in the budget-setting process, particularly moving to an Outcomes Based Budgeting approach, with zero-based budgeting elements. This allocates funds according to a set of pre-defined outcomes and priorities, focussing on what impact the wide variety of services run by a Council has on outcomes.

The Panel believes that the key benefits of such an approach could be:

- Providing the evidence to support investment in prevention and early intervention.
- Allowing us to be much clearer about the impact of capital programme proposals on outcomes and therefore being able to prioritise between them, or between revenue and capital spending.
- Encouraging innovative ideas to reduce duplication or improve outcomes through new ways of thinking in areas in which multiple departments operate.
- Using zero-base budgeting to re-set the expectation that funding levels for a service will be derived from adjusting previous funding levels, rather than the level of funding needed for a service to deliver outcomes.

The Panel believes that the Greater Manchester 'Cost Benefit Analysis' tool may help the Council advance along a journey to outcomes based budgeting, and perceive this to be very useful for advancing public sector partnerships to deliver public value and better outcomes too.

In this context, public consultation approaches will need to change to give the public a say on the Council's priority outcomes and help them understand the outcome impacts from various options featured in a consultation. Whatever the budgeting process, in future, consultations must give residents a choice and give them the information they need to understand the trade-offs involved in these choices.

Scrutiny's recommendations went to Cabinet in March. We expect their response in April.

c. Capital Expenditure Challenge Panel

A Challenge Panel to investigate the recurrent capital underspend of the Capital Programme Budget was requested at the meeting of the Performance and Finance Scrutiny Sub-Committee (3 July 2014).

The Challenge Panel gathered evidence, heard from and questioned witnesses, and considered evidence put before them in order to understand the impact of the capital underspend upon the residents of Harrow, the Council and its partners. The panel also sought to identify the key reasons for the capital underspend and to assess the financial implications. Additionally, the panel reviewed the management of the Council's capital programme and identified proposals for improvement.

The key findings and recommendations are presented in the report, grouped by the following themes:

- Governance Management
- Financial Management
- Project Management

The panel found that overall, the corporate business processes to develop the capital programme is strong and well managed, but there are areas of weaknesses within the management of the programme which require improvement. The current system needs to be strengthened to ensure that there is a corporate overview of the whole programme; that a formal interface is established between the programme management boards and members; and that the Council's decision making, payment and contract processes do not delay the start and completion of capital projects.

Extending the rolling capital programme in alignment with the four year Medium Term Financial Strategy (MTFS) will give greater stability and opportunities to plan spend. Furthermore, the panel recognise the importance of improving the profiling of capital expenditure so as to better identify genuine underspend from slippage.

Scrutiny's recommendations went to Cabinet in March. We expect their response in April.

d. Libraries review Challenge Panel joint with Ealing Council

This review considered Carillion’s performance in providing a library service for Harrow and Ealing residents in the first year of the contract (2013/14). It also considered the outcomes of the Take Part consultation on the future of Harrow libraries which ran from November 2014 to January 2015. Given the timeframe for this review, it was not in a position to influence the decisions around the budget for 2015/16, but rather inform the strategic direction of library services for 2015/16 and beyond.

The aims and objectives of the review were:

Jointly with Ealing Council:

- To review the current contract with Carillion Integrated Services for the delivery of library services across the two boroughs.
- To examine the current performance of libraries in Harrow and Ealing, as provided by Carillion.

Harrow specific:

- To consider the changes proposed for Harrow’s libraries in light of the proposed budget savings for 2015/16 and the outcome of consultation with residents (November 2014 to January 2015).
- To develop an understanding of what residents want from their local libraries.
- To explore innovative practices in the delivery of library services by Councils.
- To identify ways in which Harrow Council can deliver 21st century libraries for residents within the context of the financial challenges facing local government.
- To inform the implementation of a 3-year Harrow Library Strategy and work towards a potential West London Library Strategy with the other library authorities also managed by Carillion (Ealing and Hounslow).

The final report and recommendations are due to be agreed by Scrutiny at their April meeting and presented to Cabinet in April. We expect their response in May.

MEETING STATISTICS	10
Committee meetings	
Attendance by Portfolio Holders	<p>Cllr David Perry – Leader of the Council; Strategy, Partnerships & Corporate Leadership Portfolio Holder x2</p> <p>Cllr Varsha Parmar – Environment, Crime & Community Safety Portfolio Holder</p> <p>Cllr Sachin Shah – Finance & Major Contracts Portfolio Holder x2</p> <p>Cllr Simon Brown – Children, Schools & Young People</p>

	<p>Portfolio Holder x3</p> <p>Cllr Graham Henson – Performance, Corporate Resources & Policy Development Portfolio Holder x2</p> <p>Cllr Sue Anderson – Community, Culture & Resident Engagement Portfolio Holder</p> <p>Cllr Keith Ferry – Deputy Leader of the Council; Business, Planning & Regeneration Portfolio Holder</p>
Attendance by Partners	CX Business Improvement District Harrow Town Centre



Cllr Jerry Miles
Chair of Overview & Scrutiny



Cllr Paul Osborn
Vice Chair of Overview & Scrutiny

Report from Performance and Finance Scrutiny Sub-Committee

Our Sub-Committee

The Performance and Finance Scrutiny Sub-Committee looks in detail at how the Council's services are performing in-year. We monitor service and financial performance by analysing data and then requesting briefings or details of action plans where necessary. The Sub-Committee can make recommendations for improvement and, if necessary, make referrals to the Overview and Scrutiny committee if further work is needed.

This work includes, for example, regular review of the Cabinet's Revenue and Capital Monitoring report and quarterly Corporate Scorecard. In addition, we can decide to review and monitor the performance of the Council's partners. The papers and details of the outcomes from all our committee meetings can be found [here](#).

Our meetings

Our regular Chair and Vice-Chair's briefings and co-ordination of items with the Overview and Scrutiny Committee together drive the work programme of the Sub-Committee. Our main areas of interest in 2014-15 have been:

- Revenue and Capital Monitoring – we have been briefed on a quarterly basis by the Director of Finance and Assurance on the revenue and capital position of the authority and have been able to seek assurance with regard to the Council's likely outturn position and to question the Director on any particular areas of concern.
- Strategic Performance Report – we are briefed quarterly by the Divisional Director for Strategic Commissioning on performance against key indicators in the Corporate Scorecard. We have paid particular attention to the increased use of Bed and Breakfast accommodation and rise in homelessness across the borough this year.
- Adults and Children's Complaints Annual Reports 2013/14.
- Update on implementation of scrutiny review recommendations – Accessible Transport Review and Customer Care Review.
- Mid-year voluntary and community grants monitoring report.
- School expansions programme – we have questioned the effectiveness and milestones of the contracts used in The School Expansion programme.
- Staff Survey results and the costs of sickness absences to the authority and how such costs could be reduced in the current climate of reducing Council budgets.
- Corporate Equality Objectives Review and Annual Monitoring.
- School travel plans.

MEETING STATISTICS	5
Committee meetings	
Attendance by Portfolio Holders	<p>Clr Glen Hearnden – Housing Portfolio Holder</p> <p>Clr Sue Anderson – Community, Culture & Resident Engagement Portfolio Holder</p> <p>Clr Simon Brown – Children, Schools & Young People Portfolio Holder</p> <p>Clr Graham Henson – Performance, Corporate Resources & Policy Development Portfolio Holder</p> <p>Clr Anne Whitehead – Public Health, Equality & Wellbeing Portfolio Holder</p>



Cllr Phillip O'Dell
Chair of Performance & Finance



Cllr Barry Macleod-Cullinane
Vice-Chair Performance and Finance

Report from the Health and Social Care Lead Members and the Health and Social Care Scrutiny Sub-Committee

Our Sub-Committee

The Health and Social Care Sub-Committee considers health, social care and wellbeing issues key to Harrow residents on a local, London-wide and national level. Much of the scrutiny activity undertaken in 2014-15 was focused on the performance and inspections of the hospitals and health services that serve the residents of Harrow and our on-going participation in the Joint Health Overview and Scrutiny Committee that scrutinises the implementation of 'Shaping A Healthier Future', the NHS Programme which is implementing significant re-configuration of acute healthcare in North West London. The papers and details of the outcomes from all our committee meetings can be found [here](#).

Given the many different partners and boards involved in health policy, we requested that a protocol be drafted to outline the independent, but complementary, roles and responsibilities of the Council's health scrutiny function, the Health and Wellbeing Board and the local Healthwatch. Each body has distinct roles but there are potential overlaps in work and therefore scope for duplication. This duplication can be positive if the bodies are approaching the issues from different angles and adding value, however where the duplication is unnecessary, this does not represent the best use of resources. Therefore, developing a protocol for working collaboratively and making best use of resources is particularly warranted at a time when resources in the public sector are being further stretched. We expect the protocol to be in place by the summer of 2015.

Our meetings

Our main areas of interest in 2014-15 have been:

- Local Safeguarding Adults Board Annual Report
- Joint Health Overview & Scrutiny Committee reports on Shaping a Healthier Future
- Royal National Orthopaedic Hospital, Central North West London Hospital Trusts Quality Accounts
- Response to health checks scrutiny review
- Integration of public health into the Council – 1 year on
- North West London Hospitals Trust and Royal National Orthopaedic Hospital inspection results
- Clinical Commissioning Group Commissioning Intentions
- Public Health Annual Report
- CQC inspection of Central North West London Mental Health and Community Services
- Northwick Park winter pressures
- Healthwatch annual report and updates
- Annual Local Account

MEETING STATISTICS	6
Committee meetings	
Attendance by Portfolio Holders	None
Attendance by Partners	Deputy Chief Executive Officer London North West Hospitals Trust
	Chief Operating Officer London North West Hospitals Trust x2
	Interim Medical Director London North West Hospitals Trust

Looking Forward:

Care Act implementation

The introduction of the Care Act 2014 will come in two stages for Harrow:

- i. From April 2015, with new rights for carers to request assessments on the same basis as those that they care for, portability of care support packages when service users move into other boroughs, and the requirement that local authorities signpost people to independent advice and information services;
- ii. The introduction of the new care accounts, the introduction of the £72,000 care cap, the extended means test threshold and the increase in people coming forward for assessments following the introduction of the new care accounts/care cap (most of them previous self-funders).

The Department of Health has previously promised to “fully fund” the Care Act’s implementation costs for local authorities. However after discussions we have had with Council officers and London Council scrutiny members on this, we remain concerned about the situation in Harrow where there is an estimated funding shortfall of up to £3 million from 2015 – 2017. Similarly, London Councils have estimated a funding shortfall of around £30 million for Councils in London in 2015/16. The main financial pressures on Harrow (and other local authorities) will come in 2016 when the second wave of the Care Act’s measures are introduced and again in 2019/20 when service users start to reach the care cap. We therefore recommend the need for continued monitoring of the implementation of the Care Act in Harrow.

Better Care Fund

The £5.3bn Better Care Fund was announced by the Government in the June 2013 spending round to ensure a transformation in integrated health and social care. The Better Care Fund (BCF) is one of the most ambitious programmes ever across the NHS and Local Government. It creates a local single pooled budget to incentivise the NHS and local government to work more closely together around people, placing their well-being as the focus of health and

care services. Lead members will keep a close eye on how progress against plans will be managed.

Accident & Emergency Waiting Times

The Sub-Committee is monitoring how North West London Health Trust is improving the emergency care at Northwick Park Hospital. We are concerned that current performance levels at Northwick Park Hospital are unacceptable and have not been helped by the closure in September 2014 of the Accident and Emergency (A&E) department at Central Middlesex. Whilst there are signs of improvement, the system has failed to meet its national target. North West London Hospitals NHS Trust, which manages the hospital, has failed to meet current waiting time targets as it struggles to cope with the demand. We hope that the implementation of the Out of Hospital Strategy and the £21m investment of a new emergency department will bring expansion and improvement. However, until the committee is satisfied we will continue to monitor the performance.

Care Quality Commission Inspections (CQC)

A comprehensive inspection of North West London Hospitals Trust was carried out by the CQC between 20 and 23 May 2014. The CQC rating was inadequate for critical care and A&E required improvement. The hospital has had some issues in the past, particularly around its maternity services. However, the management team has worked hard to address these. Improvements had been made to a number of areas within the maternity services, but it still requires further improvements in order to provide a safe, effective, caring and responsive service.

The A&E department at Northwick Park required improvement. There were inadequate staffing levels to provide safe care to patients within the major treatment area. The Chief Operating Officer presented a report to the committee and proposals for addressing the issues. The committee will be monitoring the progress of the action plan and also those relating to the inspections of the Royal National Orthopaedic Hospital and Central North West London Mental Health and Community Services that took place in 2014/15 and any other inspections that will take place in 2015/16.

NHS Harrow Clinical Commissioning Group

The NHS Harrow Clinical Commissioning Group is responsible for buying Harrow health services including community health and hospital services. The committee is monitoring their plans and intentions.

Public Health Report

The Sub-Committee received a report of the Director of Public Health which looked back over 50 years at a selection of topics which were then public health issues and remained issues currently, and the report contained proposals to address these. They had the following key areas of responsibility:

- Health protection and ensuring appropriate plans were in place,
- Leading health improvement and reducing health inequalities,

- Public health support to health service commissioning and joint Commissioning
- Providing public health knowledge and intelligence

There is a great deal of work that will need to be done over the coming year to monitor progress and consider service development and changes.

NHS Health Checks

NHS Health Checks were a mandatory service which local authority public health functions have been required to deliver since 1 April 2013. Health checks were piloted and the scrutiny review showed that uptake on Health Checks in both Harrow and Barnet boroughs had been lower than expected. The Committee was informed that the take up rate for Health Checks had improved since 2014. The point of care testing equipment had been rolled out to local pharmacies and had also been offered at other venues to improve uptake even further. We will be inviting the Public Health Director to our future meetings to report on progress with these and other Public Health issues.



Cllr Mrs Rekha Shah
Chair Health Sub Committee



Cllr Michael Borio
Vice-Chair Health Sub Committee
& Policy Scrutiny Lead



Cllr Mrs Vina Mithani
Performance Scrutiny Lead for Health

Report from the Children and Families Lead Members

In 2014/15 we addressed a range of important issues that affect children and young people in Harrow. We have had meetings with the Corporate Director of Children's Services and officers every three months. The issues we have raised and discussed include:

Housing Needs

Concerns were raised over children leaving care and the connection between Children's and Housing services. We heard how the Council is intending to provide a planned distribution of permanent housing (i.e. quotas). The housing service and Children's and Families Services will continue to work in partnership and actively manage and respond to care leavers' housing needs.

Education and Children Looked After

We requested information on the action being taken to address under-performance in closing the educational gap and, in the process, learnt more about the Virtual School for Children Looked After that provides robust support and has a school improvement plan with excellent targets for 2014/2015. The virtual head has overarching control for stability and security, reviews Personal Education Plans every term and is recruiting to key roles in the team.

Youth Offending Team

The short quality screening inspection by HMI Probation Service in 2014 was disappointing as it was in 2011. Consequently a quality screening action plan has been produced and the report highlighted those issues already addressed and those which remain outstanding. Staff issues have been addressed to deliver better performance and outcomes, and measures are now in place to provide continued improvement. We will continue to monitor how the action plan is being implemented and the impact it is having.

School Expansion Programme

The need for school places ever increases and schools are being invited to offer to open additional bulge classes in September. The school expansion programme is being managed according to the Council's project management framework and regularly monitored by the stakeholder reference group and Overview & Scrutiny. Our focus has been on the delivery, transport assessment and schools travel planning of phase 3. We also heard that the free school programme is progressing well with free schools for Harrow being accepted by the Department Of Education.

Care Act

We attended a London Scrutiny Network Training Day for councillors on the delivery of The Care Act 2015. We will need to monitor the effect on young carers next year.

Looking Ahead

Our focus in the forthcoming year will be to continue to monitor Children Looked After with regard to housing; the virtual school; the performance of the Youth Offending Team; school travel plans and the support being given to schools to reach Gold Standard and lastly the implementation of the Special Educational Needs and Disability Act.



Cllr Lynda Seymour
Policy Lead for Children's and Families



Cllr Janet Mote
Performance lead for Children's and Families

Report from the Resources Lead Members

This year, the Resources Scrutiny Leads have focused on three areas within Corporate Resources: the ongoing delivery of Project Minerva, intended to make substantial savings in back office costs; the performance of the Access Harrow contact centre and website; and the impact of Universal Credit on Harrow.

1) Project Minerva

Project Minerva was agreed by Cabinet in January 2014 in anticipation of the need for the Council to continue to make substantial savings over the course of the 2015-2020 Parliament. The project is intended to reduce costs significantly in a number of back-office functions, including HR, Finance, Revenues and Benefits and IT. Over the course of the year, there have been several significant developments, notably the start of a shift towards a self-service HR model and the re-procurement of Harrow's end-to-end IT contract. Critical to the success of this project is the delivery of savings while performance is maintained or even improved (particularly in the case of IT).

2) Access Harrow performance

Scrutiny had major concerns about the performance of the Access Harrow call centre earlier in the year after widespread reports of unacceptable call wait times. Following a detailed review of operational metrics, it is clear that this issue was almost entirely due to increasing Revenue and Benefits calls resulting from welfare reform changes. This was accompanied by a reduction in the number of staff available to answer those calls. Since then, call wait times in "Revs and Bens" have fallen substantially. We will keep a sharp focus in this area in the near term as 2015/16 bills are sent out. The increase in headcount in this area provides some reassurance that we will not see a repeat of last year's problems.

Aside from this issue, Access Harrow continues to perform well on most dimensions, especially in terms of encouraging channel shift towards online access through the MyHarrow account. We look forward to a continued dialogue with Corporate Resources about developments in this area, particularly around ensuring that digitally-disadvantaged residents get equal access and, at the other end, improved mobile compatibility.

More broadly, the customer services team have responded to a 2013/14 Scrutiny review with the development of a revised set of Customer Services Standards and Complaints Procedures.

3) Impact of Universal Credit

The introduction of Universal Credit (UC) to Harrow residents this autumn (through a long phased approach) will have a knock-on implication for the Council. Firstly, the Department for Work and Pensions will not be providing any in-person support for people claiming UC. This means that many residents may end up approaching the Council for help. Secondly, Harrow will no longer be responsible for processing Housing Benefit claims, since these will

be centralised. As a result, Harrow will lose its grant for delivering this service – yet we are likely to still be expected to support DWP to verify some aspects of Housing Benefit claims.

Aside from these delivery challenges, we anticipate that some of the issues with UC (e.g. direct payment to residents at the end of the month, rather than to landlords/weekly) will have a serious, negative impact. The Council may, therefore, be called on to support people who are made homeless or suffer a loss of income as a result of issues with their UC claim. We will continue to review this carefully both in the run-up to, and the aftermath of, UC's introduction to Harrow.

And finally...

We would like to thank the fantastic support we have had from Tom Whiting, the Corporate Director for Resources and his team over the course of this year. In particular, we would single out Jonathan Milbourn and Fern Silverio for exceptionally helpful presentations. The detailed briefings and responses to questions we have received have been invaluable in allowing us to fulfil our Scrutiny role.



Cllr Adam Swersky
Performance Lead for Resources



Cllr Stephen Wright
Policy Lead for Resources

Report from the Community, Health & Well-being Lead Members

Our focus this year has been the performance of Northwick Park A&E. At times, this has been characterised by very long waiting times, people held in casualty as no beds were available, and ambulances stacked up the delivery ramp. The new casualty department was delayed in its opening but the A&E at Central Middlesex Hospital closed anyway. Things got worse at Northwick Park.

This made us decide to look at the numbers treated and the numbers that were looked after by the urgent care teams. Both had risen. The figures are still being monitored as the new A&E opened and we wanted to get a full view of the throughput. There is only a forty bed unit to receive the patients after they leave casualty. On one day, over one hundred patients had to be admitted. We ask why this was not thought about before. Now there are plans to build a further sixty beds in a modular unit, giving over one hundred beds but this still may not be enough at times.

We think that there need to be more urgent care centres with longer opening hours than at present. Again we are trying to get figures for Pinn Medical Centre and Alexander Road Centre to see what their throughput is, as well as the Care Centre at Northwick Park.

We feel that the chart below needs to be made available everywhere to guide people in what they should do if they think they need medical care. If this was used, it would reduce the demand and waiting time in casualty.



Looking ahead

We will continue to maintain our focus on A&E waiting times at Northwick Park in conjunction with the Health scrutiny leads and Sub-Committee. Other areas to be looked at are the community use of the Borough's parks and the impact of library closures, both items from the 2015/16 Budget. We will look at the affect of the closure of four libraries on the people of the borough as libraries are not just about books but are a community asset. Parks are now all getting green gyms and we are pleased to say that they are being well used this year. We will need to look at the parks and the affect that the planned reduction of maintenance will have on their usage.



Cllr Chris Mote
Policy Lead for Community, Health and
Well-being



Cllr Kiran Ramchandani
Performance Lead for
Community, Health and Well-
being

Report from the Environment & Enterprise Lead Members

Overview and Scrutiny considered reports on Climate Change and Delivering Warmer Homes Strategy to ensure progress of the Council's strategy and that the Council was successfully meeting carbon emission targets. We also considered the impact of the Outer London Funding on Harrow, noting a healthy vacancy rate continued despite small increase caused in part by the loss of some large chain stores. A positive trend in employment was also noted, boosted by growth in office jobs that in turn increased retail footfall and spend. The creation of a new park, including cafe and performance space on Lowlands Recreation Ground was progressing on schedule.

The Environment and Enterprise Leads met with the Director and other divisional managers to look at progress and work programmes within the Directorate and other public realm/environment issues including refuse collection and access; and the plans for the improvement scheme for Sudbury Hill Village (Sudbury Hill Shopping Area), a joint Scheme with London Borough of Ealing as the centre straddles the borough.



Cllr Jeff Anderson
Policy Scrutiny Lead for
Environment & Enterprise



Cllr Manjibhai Kara
Performance Scrutiny Lead for
Environment & Enterprise

Report from the Call-in Sub-Committee

The Call-In Sub-Committee met three times in 2014/15:

- 2nd October 2014
- 2nd February 2015 (education sub committee)
- 10th March

On the **2nd October** the Call-In Sub-Committee met to consider the outcome of the consultation on the senior management arrangements submitted by 10 members of the Council.

The reasons for the call-in of the decision to the Sub-Committee were:

- The Council had to make significant financial savings in the next couple of years. By re-establishing the role of the Chief Executive this would add to the savings required;
- There had been an inadequate amount of consultation and this had only involved members of staff. There had been no widening of the consultation to involve residents. Additionally the time period over which the consultation had taken place was too short;
- In a poll conducted by a local newspaper, 66% of residents had indicated that the role of the Chief Executive should remain deleted;
- There had been no engagement with the Overview and Scrutiny Process on the new proposals;
- There was no independent evidence obtained to support the new proposals. The only source of independent evidence from the Council's auditors had not highlighted any issues with the Chief Executive role having been deleted;
- There was no specific evidence contained in the report to Cabinet which supported its decision;
- The Council had passed its Revenue Budget for the financial year. This had included financial savings of up to £1.5 million as a result of the deletion of the role of the Chief Executive. By re-instating the position this would be contrary to the Budget Framework;
- Re-establishing the role of the Chief Executive was contrary to the Council's adopted Pay Policy Statement;
- The Corporate Plan also referred to the Council achieving Value for Money. Re-introducing the role of the Chief Executive would be contrary to this principle.

The Committee resolved that the challenge to the decision should be taken no further and the decision be implemented.

On the **2nd February**, the Call-In Education Sub-Committee met to consider the proposals for the expansion of Grimsdyke School which was called in by 8 members of the Council. The reasons for the call-in of the decision to the Sub-Committee were:

- The school was unique in relation to its location and the issues which impacted on its proposed expansion;

- The objection to the proposed expansion of Grimsdyke School was not related to its performance or reputation. It was recognised as a good school and the need for more school places in the borough was recognised;
- It was felt that there was inadequate consultation on the proposals. Residents within the area who would be affected by the proposals had not received any notification of the proposed expansion. These included residents on Derwent Avenue and Coburn Road;
- Of the consultation that did take place, 56% of residents were against the proposed expansion. 70 letters of objections to the proposed expansion had been submitted;
- This Sub-Committee had rarely met over a number of years. This was an indication of the level of objections against the proposed development;
- There were severe traffic problems in the area of Grimsdyke School. There was only one access route for all of the houses in that area via Coburn Road and any proposed expansion would only add to the difficulties encountered;
- There were concerns that the traffic issues around Grimsdyke School currently prevented Emergency Vehicles from entering the surrounding roads and this issue would only become worse if the expansion proposals were agreed;
- There was insufficient evidence on which Cabinet based their decision on. There was no evidence provided on how the traffic issues expressed would be mitigated. There was also no consideration given to the responses provided to the proposed expansion and how this would be addressed.

The committee resolved on a majority basis that:

- The call-in on ground (a) – inadequate consultation with stakeholders prior to the decision be not upheld;
- The call-in on ground (b) – absence of adequate evidence on which to base a decision be upheld and referred back to Cabinet for re-consideration as it was believed that the evidence provided to Cabinet was too broad and strategic for the borough and should have been more focused and specific to Grimsdyke School, particularly in relation to the traffic management issues.

On the **10th March**, the Call-In Committee met to consider the Environment and Enterprise Medium Term Financial Strategy Implementation Plan which was called in by 7 members of the Council. The call-in related specifically to the 'Garden Waste' element of the decision, which is a major part of the E&E department's savings programme over the MTFs. Having considered the report in conjunction with the main budget report it was resolved that:

- The outcome of the public consultation on the Environment and Enterprise proposals be noted;

Subject to the approval of the related budgetary proposals by full Council, the Environment and Enterprise proposals be approved and the Corporate Director for Environment and Enterprise be authorised to take all necessary steps to implement the proposals.

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