

# Overview and Scrutiny Committee

## AGENDA

**DATE:** Tuesday 13 December 2011

**TIME:** 7.30 pm

**VENUE:** Committee Rooms 1&2  
Harrow Civic Centre

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### MEMBERSHIP (Quorum 4)

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**Chairman:** Councillor Jerry Miles

**Councillors:**

Sue Anderson  
Ann Gate  
Sachin Shah  
Victoria Silver

Kam Chana  
Barry Macleod-Cullinane  
Paul Osborn (VC)  
Stephen Wright

**Representatives of Voluntary Aided Sector:** Mrs J Rammelt/Reverend P Reece  
**Representatives of Parent Governors:** Mrs A Khan/1 Vacancy

(Note: Where there is a matter relating to the Council's education functions, the "church" and parent governor representatives have attendance, speaking and voting rights. They are entitled to speak but not vote on any other matter.)

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### Reserve Members:

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1. Nana Asante  
2. Varsha Parmar  
3. Krishna Suresh  
4. Sasi Suresh  
5. Krishna James

1. Chris Mote  
2. Tony Ferrari  
3. Christine Bednell  
4. Susan Hall

**Contact:** Alison Atherton, Senior Professional - Democratic Services  
Tel: 020 8424 1266 E-mail: [alison.atherton@harrow.gov.uk](mailto:alison.atherton@harrow.gov.uk)

# **AGENDA - PART I**

## **1. ATTENDANCE BY RESERVE MEMBERS**

To note the attendance at this meeting of any duly appointed Reserve Members.

Reserve Members may attend meetings:-

- (i) to take the place of an ordinary Member for whom they are a reserve;
- (ii) where the ordinary Member will be absent for the whole of the meeting; and
- (iii) the meeting notes at the start of the meeting at the item 'Reserves' that the Reserve Member is or will be attending as a reserve;
- (iv) if a Reserve Member whose intention to attend has been noted arrives after the commencement of the meeting, then that Reserve Member can only act as a Member from the start of the next item of business on the agenda after his/her arrival.

## **2. DECLARATIONS OF INTEREST**

To receive declarations of personal or prejudicial interests, arising from business to be transacted at this meeting, from:

- (a) all Members of the Committee;
- (b) all other Members present in any part of the room or chamber.

## **3. MINUTES (Pages 1 - 12)**

That the minutes of the meeting held on 1 November 2011 and of the Special meeting held on 24 November 2011 (to follow) be taken as read and signed as correct records.

## **4. PUBLIC QUESTIONS**

To receive questions (if any) from local residents/organisations under the provisions of Committee Procedure Rule 17 (Part 4B of the Constitution).

## **5. PETITIONS**

To receive petitions (if any) submitted by members of the public/Councillors under the provisions of Committee Procedure Rule 15 (Part 4B of the Constitution).

## **6. DEPUTATIONS**

To receive deputations (if any) under the provisions of Committee Procedure Rule 16 (Part 4B) of the Constitution.

## **7. REFERENCES FROM COUNCIL/CABINET**

(if any).

## **8. WEST LONDON WASTE PLAN: PRE-SUBMISSION CONSULTATION DOCUMENT (Pages 13 - 138)**

Report of the Corporate Director of Place Shaping

**9. STRATEGIC OVERVIEW OF VOLUNTARY SECTOR SUPPORT AND UPDATE ON IMPLEMENTATION OF THIRD SECTOR STRATEGY (Pages 139 - 198)**

Report of the Divisional Director of Community and Culture

**10. SENIOR MANAGEMENT STRUCTURE RESTRUCTURE PROPOSALS CHALLENGE PANEL REPORT (To Follow)**

Report of the Divisional Director of Partnership Development and Performance

**11. REPORT FROM THE DEBT RECOVERY CHALLENGE PANEL (To Follow)**

Report of the Divisional Director of Partnership Development and Performance

**12. STANDING SCRUTINY REVIEW OF THE BETTER DEAL FOR RESIDENTS - QUARTERLY REPORT (To Follow)**

Report of the Divisional Director of Partnership Development and Performance

**13. REPORT OF THE PERFORMANCE AND FINANCE SCRUTINY SUB-COMMITTEE CHAIR (To Follow)**

Report of the Divisional Director of Partnership Development and Performance

**14. REPORT FROM SCRUTINY LEAD MEMBERS (To Follow)**

Report of the Divisional Director of Partnership Development and Performance

**15. ANY OTHER BUSINESS**

Which the Chairman has decided is urgent and cannot otherwise be dealt with.

**AGENDA - PART II**

**Nil**

*Note: In accordance with the Local Government (Access to Information) Act 1985, the following agenda items have been admitted late to the agenda by virtue of the special circumstances and urgency detailed below:-*

<u>Agenda item</u>	<u>Special Circumstances/Grounds for Urgency</u>
10. Senior Management Restructure Proposals Challenge Panel Report	Members are requested to consider the report, as a matter of urgency, so that a reference can, if necessary, be submitted to Cabinet on 15 December 2011. The report was not available when the main agenda was printed and circulated due to the need to consult with Members and officers.

11. Report from the Debt Recovery Challenge Panel

Members are requested to consider the report, as a matter of urgency, so that a reference can, if necessary, be submitted to Cabinet on 15 December 2011. The report was not available when the main agenda was printed and circulated due to the need to consult with Members and officers.

12. Standing Scrutiny Review of the Better Deal for Residents – Quarterly Report

Members are requested to consider the report, as a matter of urgency, so that a reference can, if necessary, be submitted to Cabinet on 15 December 2011. The report was not available when the main agenda was printed and circulated due to the need to consult with Members and officers.

*Note: In accordance with the Local Government (Access to Information) Act 1985 following agenda items have been admitted late to the agenda by virtue of the special circumstances and urgency detailed below:-*

Agenda item

Special Circumstances/Grounds for Urgency

3. Minutes of the Special Meeting held on 24 November 2011

Members are requested to consider the minutes, as matter of urgency, as they were not available at the time the main agenda was printed and circulated due to the proximity of the two meetings.

13. Report of the Performance and Finance Scrutiny Sub-Committee Chair

Members are requested to consider the report, as a matter of urgency, so that the Committee can be informed of the work of the Sub-Committee. The report was not available when the main agenda was printed and circulated due to the proximity of the two meetings.

12. Report from Scrutiny Lead Members

Members are requested to consider the report, as a matter of urgency, so that they can be kept informed of the work being done. The report was not available when the main agenda was printed and circulated due to the need to consult with Members and officers.

# OVERVIEW AND SCRUTINY COMMITTEE MINUTES

## 1 NOVEMBER 2011

**Chairman:** \* Councillor Jerry Miles

**Councillors:**

* Sue Anderson	* Barry Macleod-Cullinane
* Kam Chana	* Sachin Shah
* Tony Ferrari (2)	* Victoria Silver
* Ann Gate	* Stephen Wright

**Voting** (Voluntary Aided) (Parent Governors)

**Co-opted:**

* Mrs J Rammelt	* Mrs A Khan
Reverend P Reece	

\* Denotes Member present  
(2) Denotes category of Reserve Members

### 191. Attendance by Reserve Members

**RESOLVED:** To note the attendance at this meeting of the following duly appointed Reserve Member:-

Ordinary Member

Councillor Paul Osborn

Reserve Member

Councillor Tony Ferrari

### 192. Declarations of Interest

A Member stated that the Vice-Chair had raised the issue of dispensations for those Members of the Committee that were school governors in order to

facilitate their participation in the discussion on certain education matters with Legal & Governance. Members discussed issues around interests in relation to item 8, School Place Planning (including Admissions Policy).

An officer advised that there was currently no update on the position regarding dispensations but that she would follow this up. The Chair stated that as the report related to primary schools it was, in his view, unnecessary for those Members who were governors of high schools to leave the room during the discussion on item 8.

**RESOLVED:** To note that the following interests were declared:

Agenda Item 8 – School Place Planning (including Admissions Policy)

Councillor Kam Chana declared a personal interest in that although he was a governor of a primary school, it was not one of those included in the report. He would remain in the room whilst the matter was considered and voted upon.

Councillor Tony Ferrari declared a prejudicial interest in that he was a governor of a primary school accepting a bulge class. He would leave the room whilst the matter was considered and voted upon.

Councillor Ann Gate declared a personal interest in that she was married to the Portfolio Holder for Schools and Colleges. She would remain in the room whilst the matter was considered and voted upon.

Mrs Khan declared a personal interest in that she was a governor of a high school. She would remain in the room whilst the matter was considered and voted upon

Councillor Barry Macleod-Cullinane declared a personal interest in that his sister taught in a Harrow School. He would remain in the room whilst the matter was considered and voted upon, unless the interest became prejudicial and he would then leave.

Mrs Rammelt declared a personal interest in that she was a governor of a sixth form. She would remain in the room whilst the matter was considered and voted upon

Councillor Sachin Shah declared a personal interest in that he was a governor of Rooks Heath High School. He would remain in the room whilst the matter was considered and voted upon.

Councillor Stephen Wright declared a personal interest in that he was a governor of a high school and his wife was a teacher in a high school. He would remain in the room whilst the matter was considered and voted upon.

Agenda Item 9 – Neighbourhood Champions

Councillor Susan Anderson declared a personal interest in that she was a neighbourhood champion. She would remain in the room whilst the matter was considered and voted upon.

Councillor Kam Chana declared a personal interest in that he was a neighbourhood champion. He would remain in the room whilst the matter was considered and voted upon.

Councillor Barry Macleod-Cullinane declared a personal interest in that he had been a member of the Cabinet that had approved the Neighbourhood Champions scheme. He would remain in the room whilst the matter was considered and voted upon.

Councillor Stephen Wright declared a personal interest in that he was a neighbourhood champion. He would remain in the room whilst the matter was considered and voted upon.

### **193. Minutes**

**RESOLVED:** That the minutes of the meeting held on 22 September 2011, be taken as read and signed as a correct record.

### **194. Public Questions, Petitions and Deputations**

**RESOLVED:** To note that no public questions were put, or petitions or deputations received at this meeting under the provisions of Committee Procedure Rules 17, 15 and 16 (Part 4B of the Constitution) respectively.

### **195. References from Council/Cabinet**

There were none.

## **RESOLVED ITEMS**

### **196. School Place Planning (including Admissions Policy)**

The Committee received the report which provided information on the Council's primary school expansion programme and related school organisation issues. These included proposals for the secondary school strategy, up-dates on free schools and academies, and school admissions.

An officer outlined the content of the report and advised that the consultation on a set of proposals affecting schools across Harrow would close on 11 November 2011. The consultation documents were included at Annex A to the report.

Members made comments and asked a number of questions as follows:

- A Member stated that a number of primary schools had previously had smaller class sizes in order to accommodate equipment as they had children with physical disabilities and she questioned whether such schools, for example, Elmgrove, were going to be expanded or have their status changed. She questioned how these schools could know that they no longer required additional equipment, and therefore space, for those children. The officer advised that it was a calculated risk by

the school but they had agreed to take on additional pupils either because they felt they could cope or did not foresee any issues.

- A Member questioned the cost of the proposals in terms of revenue and capital and was advised that the revenue budget was cost neutral as it was funded from the government's Direct Schools Grant (DSG). In terms of capital, the officer advised that London Councils were putting together a case to Government regarding the lack of sufficient funding.
- Referring to page 4 of the consultation document, a Member questioned how the list of proposed schools for extra permanent places had been prepared. The officer advised that the criteria had been agreed by a group of officers and a representative group of primary school head teachers. Another officer advised a range of factors, including accommodation and site size, had been considered. The group had needed to be sure that there was potential to expand a school, had considered the popularity of a school, demand across the borough and the school ranking in terms of the primary school planning area.
- A Member stated that the report did not provide an analysis of how well forecasts of school roll projections had been done in the past and how changes in the number of pupils would affect the criteria. The officer, referred to the table on page 22 of the consultation document, which presented the accuracy analysis.
- Given the current economic climate, a Member questioned the additional pressures given that parents may no longer be able to afford to send their children to independent schools. An officer reported that this issue had been more prevalent in other boroughs, such as Richmond and Kingston, and that to date there had not been significant change in Harrow.
- A Member requested the details on applications to the government's Priority Schools Building Programme for the 11 schools referred to on page 17 of the report and which schools they were. An officer advised that the applications were as follows:

Aylward Primary School  
Cedars Manor School  
Elmgrove Primary School and Nursery  
Kenmore Park Infant and Nursery School and Kenmore Park Junior School  
Longfield Primary School  
Marlborough Primary School  
Priestmead Primary School and Nursery  
Vaughan Primary School  
Weald Infant and Nursery School and Weald Junior School  
Salvatorian College  
Hatch End High School (academy)



An application for a new secondary school was also included anticipating the impact of the increasing number of pupils in the primary school sector that would transfer to the secondary school sector in future.

- Responding to a question on the primary projections, the officer advised that a 5% planning margin had been included which allowed for peaks in demand and some flexibility and choice which would be managed by permanent expansion and the use of bulge classes as required. Given the Member's question on the number of bulge classes and number of permanent classes, he would look at the presentation of the data to see if it could be improved.
- A Member, referring to the predicted peak in 2019, questioned how officers from Children's Services were working with other departments to address this growth pressure. The officer advised that there were discussions with planners and performance officers in terms of developments and expected number of young people.
- A Member stated that the environmental impact paragraph of the report required more detail and the officer took her comments on board.
- A Member questioned the likely impact of primary school academies. The officer responded that currently no primary school had formally applied for academy status but if every primary school did apply, a nationwide programme would need to be devised. This matter was now included on the corporate risk register.
- Responding to a Member's question as to the cost of the primary expansion programme and whether the assumption was £7 million, an officer confirmed this figure was an assumed estimate of the future funding from the Department for Education and that the programme would be phased over several years. The Member was advised that, in terms of deprivation, the local authority received funding. As part of a feasibility study, consideration would be given to the impact of additional pupils on school sites in terms of a range of issues including dining.
- A Member stated that Harrow had changing needs due to its demographics and questioned whether the Council was receiving adequate grant per pupil. The officer advised that the government allocated funding to local authorities for schools and that the Schools Forum decided on the formula to allocate this funding to schools. The argument in terms of Harrow's transient population and deprivation may now be redundant as the Government's proposed new national funding formula reduced the impact of these considerations.
- The officer confirmed that the bulge classes would be for one year only.

The Chair thanked the officers for their attendance and responses.

**RESOLVED:** That the report be noted.

## **197. Neighbourhood Champions**

The Committee received a report which set out the progress on the Neighbourhood Champions initiative, summarised the points raised at the Neighbourhood Champions Conference and described changes in principle to the scheme agreed by Cabinet. The report advised that officers would be developing plans to implement the changes and seek the views of the Committee on the scheme.

The Corporate Director of Community and Environment outlined the content of the report and stated that the view emerging from the conference was that the anonymity of the neighbourhood champions could be a barrier. There had been mixed views on this but it was clear that the champions were willing to take on more responsibility.

Members made comments and asked questions as follows:

- A Member questioned, in terms of anonymity, how much information was published. The Corporate Director advised that there was a centrally held database within public realm that had limited access. With permission, it was appropriate to share neighbourhood champion information with other champions within a ward or the ward councillor. There was also a neighbourhood champion facebook page. The issue would be discussed further at the next conference.
- In response to a Member's question as to the target number of neighbourhood champions, the Corporate Director advised that the aim was to have one on each postcode section of a street, 2000 in total.
- A Member requested transcripts of what was said at the conference and the Corporate Director undertook to see if this information could be provided. Whilst being supportive of the role, the Member expressed concern at the possible overloading of the champions and she indicated that she would like to see the scheme being shared with other departments to enable them to identify suitable champions. She also suggested that other schemes, such as Sutton's book lending service, be considered and that the Communications team needed to report what had been achieved. The Corporate Director advised that the scheme was approached in a 'one Council' way and agreed that it could be developed for use in Children's Services. It was about reporting anything that did not seem right for professional assessment.
- A Member questioned the number of champions trained this year and was advised that, due to the re-structure in public realm, there had been a period of 4 months when no training had taken place. There was no issue in terms of funding this work area and training material was currently being revised.

- Referring to paragraph 9 of the report, a Member stated that burglary and security activities should also be included. The Corporate Director acknowledged that the Safer Neighbourhood Teams provided regular newsletters and thanked the Police for their active involvement with the scheme.
- Members questioned whether there was any cost associated with inactive champions and what was being done to capture information on those individuals ceasing to be champions. The Corporate Director undertook to look into this, although if there was clearly inactivity it would be investigated.
- Responding to a Member's question, the Corporate Director advised that approximately 60-70 reports were received from neighbourhood champions each month. The Member stated that there had been input from the Primary Care Trust and public health at the training for champions and the Corporate Director indicated that he would be happy to consider well being issues too. Another Member stated that it was necessary to engage with colleagues in public health. The Corporate Director undertook to discuss these issues further with the Director of Public Health.
- A Member stated that, despite the report stating that there were no financial implications, there clearly were as there was a budget in public realm. The benefits of the scheme did, however, justify the funding. The Corporate Director responded that there was no increase in costs.

The Chair thanked the Corporate Director for his attendance and responses.

**RESOLVED:** That the report be noted.

## **198. Corporate Complaints - Annual Report**

The Committee received a report which provided information on complaints received by Harrow Council and how they were handled. The officer reported that the number of complaints recorded on CRM had risen to over 1,500 and this could be viewed as positive. If complaints were understood, they could be rectified and responded to and common themes could be addressed. 85% of complaints had been responded to within timescales set.

The officer reported that it was necessary to do more promotion to advise residents of the complaints procedure. Currently, only 4% of complaints were received through the web and officers would like to increase the usage of this channel. In terms of the next steps, officers would be looking at the possibility of sharing complaints data with neighbouring authorities.

Having considered the report and the figures contained therein, Members made comments and asked questions as follows:

- A Member stated that it would have been helpful if the officer had spoken to the officer that had attended the last meeting of the Committee to present the reports on Adults and Children's Services' complaints in order to address the issues raised at that meeting in the report currently before Members.
- In terms of communications, a Member advised that Aberdeen Council were doing well in this area and she questioned how Harrow was performing. The officer responded that a considerable amount of data was collected via Access Harrow and that the complaints database was operated through a CRM system. Work would continue with the Communications team in order to convey the message in terms of complaints reporting.
- A Member challenged the officer, questioning the aim of the report and what it sought to report. The Member stated that the report contained 2 sets of unrelated data and that there was no basis for comparison. It appeared that the complaints process was isolated from the operation of the Council and he questioned what residents actually complained about as the report did not provide that information. The officer advised that the report detailed the 2011/12 figures compared with previous year's, highlighted issues and provided information on Local Government Ombudsman complaints. The officer reported that there was a mismatch of data as in previous years as not all departments had used CRM. This would be improved in future years as the quality of data improved. There were regular meetings of the complaints co-ordinators and information was shared at the quarterly improvement boards. In order to try to address some of the Member's concerns, the officer undertook to try to make the report clearer in the future.
- Responding to a Member's question, the officer advised that the increase in the number of complaints recorded was due to the CRM system and that previously there had not been a holistic approach. He advised that the complaint's co-ordinators were authorised to respond to stage one complaints in their service area. The Member reiterated the view that he had expressed at the Committee's previous meeting in that the Chief Executive should see all stage 3 complaints prior to submission to the Local Government Ombudsman. In terms of the number of complaints seen by the Ombudsman, the officer advised that of the 147 considered, approximately  $\frac{1}{3}$  had bypassed Harrow's complaints process. Once the Ombudsman's annual report was received, it would be possible to identify which complaints had progressed to stage 3.
- A Member questioned the reasons for late responses from Housing and was advised that sometimes the Council let itself down by not keeping the customer informed of any on going investigation. There was a need to manage customer expectations.
- A Member stated that he could not tell from the report whether complaints was properly resourced. The officer advised that, in terms

of benchmarking, information had been requested from other boroughs.

- Following questions from a Member as to the accuracy of recording complaints, the officer advised that the issue was determining whether a matter was a complaint or service request and that a stage 1 complaint was an issue that could not be resolved on the spot. In terms of a complaint that had not been resolved within the specified service standard, he advised that he would expect the matter to be escalated. In terms of the procedure in place, he advised that he chaired the customer service group and that a regular report was submitted to the Corporate Strategy Board, which was also shared with the service lead. The Councillor enquiry email address was monitored by Access Harrow and he was looking to see if councillor requests could be captured through CRM on their dedicated enquiry line.
- A Member commented that it would be beneficial for the Chief Executive to see the whole process and added that, in the re-structure, complaints did not appear to be cross cutting. The officer advised that a regular report was considered by the Improvement Boards, that all directorates were represented at the quarterly complaints meetings and that a number of complaints were initially directed to the Chief Executive's office and he was therefore aware of the process.
- In terms of equalities, the officer would be discussing this issue with the Council's Equalities officer in 3-4 weeks. He would like to see an increase in the use of the web form to capture equalities information.
- A Member questioned the use of mystery shoppers and was advised that whilst such exercises had been carried out annually, from January 2012 they would be monthly.

The officer advised that both his Director and the Assistant Chief Executive participated in a back to the floor exercise on a monthly basis in order to better understand customer demand. Corporate and Divisional Directors were also encouraged to take part. He invited any Member that was interested to contact him if they wished to work in Access Harrow to see how it operated.

The Chair thanked the officer for his report and responses.

**RESOLVED:** That the report be noted.

#### **199. Project Report - Measuring up: Harrow Council's Use of Performance Information (Phase 2)**

The Committee received the report which outlined the findings and recommendations from the recent scrutiny review which had examined the Council's use of performance information. The purpose of the review had been to consider the principles that should underpin Harrow's local performance management framework going forward.

The Chair stated it was an extremely useful and well researched report and thanked all those involved in the review and with the production of the report. He advised there had been three work streams to the report (Best practice, Customer engagement, and Technology and Data presentation) which had contributed to the recommendations arising and that he and the Vice-Chair (the Chair of the Review) had discussed the report with the Chief Executive and a meeting with the relevant Portfolio Holder would be arranged.

**RESOLVED:**

That the report of the review group be agreed and be referred to Cabinet for consideration.

**200. Scrutiny Lead Member Report**

The Committee received a number of reports of Scrutiny Lead Members. An officer apologised for the delay in the Safer and Stronger Communities report.

In terms of the carbon reduction commitment, following a comment that there should be caution, the scrutiny lead advised that there was clear evidence that climate change existed.

**RESOLVED:** That the reports be noted and the actions proposed be agreed.

**201. Any Other Business**

**RESOLVED:** In accordance with the Local Government (Access to Information) Act 1985, the following items, which were not available at the time the agenda was printed and circulated, were admitted to the agenda in order to enable the work to be progressed as soon as possible:

14. Standing Scrutiny Better Deal for Residents – Phase Two Scope
15. Standing Scrutiny Review of the Budget Scope

**202. Standing Scrutiny Better Deal for Residents - Phase Two Scope**

The Committee considered the scope for the second phase of the Standing Scrutiny Review of the Better Deal for Residents.

**RESOLVED:** That the scope for the project be approved.

**203. Standing Scrutiny Review of the Budget Scope**

The Committee considered the scope for the Standing Scrutiny Review of the Budget. The Chair of the Review reported that Place Shaping had suggested that spending on capital be considered but that, in his view, a challenge panel may be required for this topic given the Area Action Plan.

**RESOLVED: That the scope for the project be approved.**

**204. Termination of Meeting**

In accordance with the provisions of Committee Procedure Rule 14 (Part 4B of the Constitution) it was

**RESOLVED:** At 9.59pm to continue until 10.15pm.

(Note: The meeting, having commenced at 7.35 pm, closed at 10.10 pm).

(Signed) COUNCILLOR JERRY MILES  
Chairman

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**REPORT FOR: OVERVIEW AND  
SCRUTINY COMMITTEE**

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<b>Date of Meeting:</b>	13 December 2011
<b>Subject:</b>	West London Waste Plan: Pre-Submission Consultation document
<b>Responsible Officer:</b>	Andrew Trehern – Corporate Director of Place Shaping
<b>Scrutiny Lead Member area:</b>	Councillor Stephen Wright – Policy Lead – Sustainable Development and Enterprise Councillor Chris Mote – Policy Lead – Safer and Stronger Communities Councillor Nana Asante – Performance Lead – Safer and Stronger Communities Councillor Sue Anderson – Performance Lead - Sustainable Development and Enterprise
<b>Exempt:</b>	No
<b>Enclosures:</b>	Appendix 1 - Summary Report of Consultations - West London Waste Plan: Proposed Sites and Policies Consultation Document Appendix 2 - Proposed West London Waste Plan: Pre-Submission Consultation document

**Section 1 – Summary and Recommendations**

This report presents the results of the consultation held in February and March 2011 on the West London Waste Plan Proposed Sites and Policies Consultation Document and introduces the next version of the Plan – the Pre-Submission document – proposed for publication for public consultation in January 2012.

**Recommendations:**

That the report be noted and the comments of the Committee be forwarded to Cabinet.

## **Section 2 – Report**

### **A. Background**

1. The West London Waste Plan (WLWP) forms part of Harrow's Local Development Framework (LDF) and those LDFs of the other five West London Waste Authority partner boroughs.
2. The purpose of the WLWP is to set out a planning strategy to 2026 for sustainable waste management, the delivery of national and regional targets for waste recycling, composting and recovery, and to provide sufficient waste management capacity to manage waste arisings across the six west London boroughs.
3. The drafting of the WLWP has taken into account relevant planning legislation; national planning policy statements; on-going advice from the Greater London Authority and the Planning Inspectorate; and also from lessons learnt from professional planning bodies and agencies. The previous key consultation stages in the drafting of the WLWP comprised:
  - Issues and Options (February 2009)
  - Proposed Sites and Policies (February 2011)
4. Once adopted, planning applications for any new waste management facilities will be considered in the light of the WLWP policies, and they will also be assessed by the relevant council against the individual borough's Local Development Framework, including its local development management policies and any other material considerations.

### **B. 2011 Consultation on the West London Waste Plan: Proposed Sites and Policies Consultation Document**

5. The WLWP Proposed Sites and Policies Consultation Document was reported to this Committee at its meeting of 2 November 2010 and subsequently approved by Cabinet on 18 November 2010 for publication for public consultation.
6. The detailed arrangements made in Harrow to involve the public and key stakeholders in consultations on the Proposed Sites and Policies stage of the WLWP followed the approach set out in the Council's adopted Statement of Community Involvement (SCI). The SCI sets out a minimum of six weeks for public consultations for each of the stages in the plan-making process. Consultations on the WLWP were carried out over a six-week period between 9 February and 25 March 2011.
7. During this period:
  - A press notices was placed in the Harrow Observer on 10 February.
  - The consultation documents were made available for viewing and comment at all borough public libraries and at the Civic Centre Planning Desk.
  - Public information displays were exhibited at the Civic Centre, Central Reference Library, and Wealdstone Library.

- An information drop in session was held at the Civic Centre on 18 February that was attended by both planning and waste officers to raise awareness and encourage discussion about the draft WLWP.
- The consultation was also advertised on the Council's website as well as the WLWP website from 9 February.

8. In addition to the above, a direct letter drop was also undertaken of residents and businesses in the immediate area surround the Council's Depot site, notifying them of the site's inclusion as a proposed waste site in the WLWP. The letter informed them of the proposal, where they could obtain further information including attending the drop in session being held at the Council as well as the other events being held across West London, and how they could make representation to document.

9. In Harrow alone, approximately 1,200 letters and emails were sent to various groups and individuals, inviting comments on the consultation documents. The letters included a brief summary about the draft WLWP, where to view it and how to provide comments. Relevant groups were also provided with a copy of the draft Plan on a CD Rom. Responses were invited on-line, by email, by completing a Consultation Response Form, by letter or fax.

10. All elected members and local MPs were posted a letter explaining the consultation process and an invitation to a drop-in session, with a hard copy of the draft Plan delivered to the Group offices, with additional hard copies delivered upon request. A letter, copy of the draft WLWP and CD-Rom was sent to all statutory consultees.

### **C. The West London Waste Plan: Proposed Sites and Policies Consultation Document – Consultation Results**

11. A total of 374 responses were received from organisations and individuals on the various chapters, policies and proposals. A summary report on the responses received is attached at Appendix 1. The main areas of concern which arose are summarised below.

12. The overwhelming focus of the consultation responses was on the 24 sites proposed for potential waste management use. The main objections were to the Tavistock Road former Coal Depot at West Drayton in Hillingdon and to a set of proposed sites at Park Royal in Brent and Ealing.

13. To summarise the main concerns raised:

- Former Coal Depot, Tavistock Road, West Drayton - this proposed new site received the most objections (67) of any single proposal. In addition, a petition with 2,201 signatures was submitted against including the site in the WLWP. The main concerns raised by the petitioners were the location of the site close to three residential estates and its likely environmental impact on local residents; and the likely impact of traffic congestion which would result from a major waste facility being sited there. There were also specific criticisms of the site assessment scoring system used by the consultants,

particularly, that the weighting given to proximity to residential areas had not been consistently applied.

- Park Royal Sites (existing site numbers 352 and 328 and proposed new sites numbers 386,129,186, 187,183,182,191) - one third of total responses to the draft WLWP opposed the sites proposed at Park Royal. Many of these expressed local residents' concerns at the designation of several sites for waste use in such close proximity. A 193-signature petition was received on this issue. The main concerns raised by the petitioners were the unfairness of locating so many sites in the area; the cumulative impact of new sites when added to existing waste and industrial facilities; proximity to housing; increased traffic; air pollution and the health impacts of pollution. A number of submissions addressed the site assessment procedure, suggesting that the weighting on transport accessibility resulted in the impacts on local residents not being properly considered. It was also suggested that existing air quality and the cumulative impacts of more than one site should be included in the site assessment.

14. A total of four objections were received to the proposed Council Depot site, three from residents in Cullington Close and one from Harrow Local Agenda 21. The representation all raised concerns with proximity and potential for impact on the neighbouring residential area and access issues. Two of the representations made by residents suggested the Kodak site would be a much better site for a waste treatment facility in Harrow. However, as set out in the O&S Committee and Cabinet reports on the Proposed Sites and Policies stage document, the Kodak site did not score above the threshold for inclusion in that document for further public consideration, following a robust site suitability assessment.

15. The Consultation Document included four proposed policies which would be used to determine future planning applications for proposed new sites. To summarise the response to these:

- Policy 1: Location of Waste Development – a key concern with this policy was that sites should not be located close to residential communities. Other concerns were the fact that the Plan is technology neutral and there were requests from the waste sector for greater flexibility in the Plan to make clear that other sites, not allocated in the Plan, could still be considered in the future. The draft Plan seeks to safeguard residents' amenity through its policies - together with detailed development management policies in boroughs' individual Local Development Frameworks.
- Policy 2: Ensuring High Quality Development - key suggestions here were that the sustainable transport requirements should be strengthened; there should be greater protection for local residents taking account of their views on proposals, particularly regarding the cumulative impacts of a number of sites; and ensuring effective monitoring. Officers consider that the draft policies in the Plan sufficiently cover the transport implications of individual waste proposals. Residents' views on individual proposals will be taken into account by individual boroughs, in accordance with their own

Statements of Community Involvement. Monitoring will continue through boroughs' Annual Monitoring Reports.

- Policy 3: Decentralised Energy - while there was considerable support for this policy a number of concerns were expressed about the impacts of particular technologies on local communities, and the potential negative impact on recycling rates if more waste went to energy generation. The environmental aspects of proposed developments will be taken into account through the planning application process in each borough.
- Policy 4: Sustainable Site Waste Management - a third of those commenting on this policy considered that the proposal that at least 10% of materials / products used in the construction of new waste developments should come from reused or recycled materials was too low. There is no defined level of materials' use in new developments. It will be for boroughs to determine the viability of requesting this level of recycled materials' use when planning applications are submitted.

## **D. The Proposed Submission Draft of the WLWP**

16. The WLWP Pre-Submission documents has been amended to take into account the consultation responses, the findings of a detailed Site Delivery Assessment carried out by the consultants, a Sustainability Appraisal and an Equalities Impact Assessment which have also been prepared in support of the draft Plan. Two detailed schedules, comprising all comments received on the sites included in the draft Plan and all comments received on other matters (the proposed approach to waste management in the draft Plan, the individual proposed policies, monitoring and other aspects and the Sustainability Appraisal) are included as background papers to this report and will form part of the background evidence base. The main changes to the draft Plan are set out below.

### **a) Land take requirement for the WLWP**

17. The WLWP Proposed Sites and Policies document stated that West London needed to identify a maximum of 56 ha of land for waste management facilities to ensure that the 2008 London Plan apportionment is met. The replacement London Plan, which is now adopted, revised the total waste arising forecasts and borough appointments (provided at Table 3.4), which have reduced West London's required land requirement a maximum of 22.4ha to ensure that the 2011 London Plan apportionment is met. The reduction in the land take requirement is largely because the 2008 London Plan included very high and unrealistic projections for municipal solid waste and commercial and industrial waste arisings.

### **b) Existing sites**

18. The WLWP Proposed Sites and Policies document included 10 existing sites totalling 16.19 hectares. The revised plan now includes 8 sites totalling 19.39 hectares, namely:

- Twyford Waste Transfer Station in Brent

- Veolia Transfer Station, Marsh Road in Brent
- Greenford Reuse and recycling site, Greenford in Ealing
- Greenford Depot, Greenford Road in Ealing
- Quattro, Victoria Road, Park Royal in Ealing
- Victoria Road Transfer Station in Hillingdon
- Transport Avenue Waste Transfer Station in Hounslow
- Twickenham depot in Richmond

19. The two sites that have come off the initial list are Rigby Lane Waste Transfer Station in Hillingdon and the Townmead Reuse and Recycling Site in Richmond. Following a further review of existing uses it was determined that the Rigby Lane site was actually a waste treatment facility and was therefore transfer to the existing waste treatment sites list. The Townmead Reuse and Recycling Site had ceased waste transfer activities and had been sold for redevelopment. The increase in the total from 16.19 ha to 19.39ha is largely due to a recalculation of the site area at the Twickenham Depot.

**c) Proposed sites**

20. The WLWP Proposed Sites and Policies document included 14 new sites totalling 50.42 hectares. It was prepared with the intention of including a sufficient number of sites in order to allow a meaningful consultation to take place. The revised plan now includes 3 sites totalling 9.15 hectares, namely:

- Council Depot at Forward Drive in Harrow
- Yeading Brook, Bulls Bridge in Hillingdon
- Western International Market in Hounslow

21. It should be noted that the following sites have been removed from further consideration through the WLWP Pre-Submission document:

- Tavistock Road Coal Depot, West Drayton, Hillingdon
- Silverdale Road Industrial area, Hayes, Hillingdon
- Abbey Road, Park Royal, Brent
- Rail sidings, Premier Park Road, Park Royal, Brent
- Alperton Lane Industrial area, Marsh Road, Alperton, Brent
- Hannah Close/Great Central Way, Wembley, Brent
- Three Park Royal sites (2, 8 and 9).
- Park Royal site 1 in Ealing
- Atlas Road site at Park Royal in Ealing

22. As stated in paragraph 17 above, the land take requirement is now a maximum of 22.4 ha to ensure that the 2011 London Plan apportionment is met. An additional amount of land is required in the WLWP to ensure some flexibility in the event that sites do not come forward. From the details given above, it is apparent that the WLWP Pre-Submission document includes 8 existing sites totalling 19.39 hectares and 3 new sites totalling 9.15 hectares, which amount to a total of 28.54 hectares. It can therefore be included that the Plan being put forward includes sufficient land for waste management facilities to ensure that the 2011 London Plan apportionment is met.

**d) The WLWP policies**

23. In order to be in conformity with the London Plan adopted in July 2011, a further policy has been introduced. This makes clear that existing and proposed waste management and transfer sites in west London will be safeguarded for waste use. Development for non-waste uses will not be considered unless compensatory and equal provision of sites for waste, in scale and quality, is made elsewhere within the west London boroughs.

24. The wording of policy on the location of waste development has been amended in order to strengthen the requirement to ensure that there is no loss in existing capacity at existing or allocated waste sites.

25. The wording of the policy on ensuring high quality development has been amended with several new additions to protect the amenities of the area; to incorporate sustainable urban drainage systems; to ensure no increased flood risk in the area; to protect heritage assets such as conservation areas and listed buildings; and to ensure that adjacent development proposals do not prejudice the use of sites allocated for waste purposes.

26. The policy on decentralised energy remains unchanged and the policy on sustainable site waste management has been strengthened to ensure that construction plans are comprehensive and capable of being delivered.

**e) Volumes of different types of waste**

27. A substantial amount of information has been added at Section 3.2 in order to explain the volumes of different waste flows, in order to meet the requirements of central Government planning guidance.

28. The Sustainability Appraisal is being updated and an Equalities Impact Assessment has also been undertaken for the proposed policies and both will be published as part of the Pre-Submission consultation.

**E. Next Steps**

29. The remaining timetable for the preparation of the WLWP will involve:

a) A six-week public consultation on the Pre-Submission version of the WLWP to be held across the six boroughs during February and March 2012.

b) The consultation responses will then be assessed and any further evidence base research undertaken before officers report back to LDF Panel, this Committee, Cabinet and full Council on the outcomes of consultation and seek Members' approval to submit the final WLWP, with any further proposed changes, to the Secretary of State for formal examination.

30. Officers then anticipate the Examination in Public to be held during the autumn of 2012 and the Plan to be adopted by the six boroughs, as part of their respective LDFs, in early 2013.

## **F. Why a Change is Needed**

31. At the moment, the London Plan and national policy provide the only direct policy guidance to councils. The absence of local policies does not prevent private companies making applications for waste treatment developments within the borough, completely separate from the development of the Waste Plan. This highlights the importance of developing an effective local policy framework against which to consider such applications.

32. As stated in the introduction to the report, there are also a number of other influences driving the requirement to bring forward the WLWP. These include the EU Landfill Directive, which seeks to direct waste away from landfill and includes landfill allowances that reduce over time, which if not achieved result in a landfill tax being imposed. In addition to this financial implication, there is also a need to acknowledge changing best practice and the achievement of wider sustainability objectives. In particular, the acceptance of the proximity principle in national and regional policy, which requires the treatment of waste take place close to where the waste is generated. In summary, London should treat London's own waste within London.

## **Financial Implications**

33. The costs of preparing, publishing, and consulting on the WLWP are shared equally between the six partner boroughs, and Harrow's share of the cost of undertaking the next public consultation stage on the WLWP are contained within the existing LDF budget. The cost of subsequent work required to progress the document to adoption is incorporated in the LDF team budget for 2011/12 and the MTFs.

## **Performance Issues**

34. The WLWP will deal with municipal waste and commercial and industrial waste in accordance with the London Plan.

35. 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)

36. Since 2004/05 the amount of household waste generated in Harrow has decreased year upon year from 105,331 tonnes to 95,610 tonnes in 2008/09. Harrow has increased the amount it recycles and composts significantly in recent years, achieving 50% in 2010/11 (the highest rate in London). The remaining 50% continues to go to landfill.

37. 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 the above targets.



## Environmental Impact

38. The draft 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. The Sustainability Appraisal has been used generally to identify constraints and assess the suitability of sites. New sites proposed to be taken forward in the Plan for allocation as a waste treatment site have undergone a site specific sustainability appraisal. This highlighted a number of issues regarding the Council's Depot site that will need to be mitigated through any future waste proposal on the site, including potential impacts on neighbouring residential and commercial properties, the requirements for relocation or consolidation of the existing depot functions, and the transport implications. Much depends on the type of waste treatment facility to be proposed for the site. Mitigations measures envisaged include putting all new and existing waste facilities undercover, to address existing a potential visual, odour and noise impacts.

39. The Sustainability Appraisal will be published for public consultation alongside the WLWP Pre-Submission Consultation document. The Committee are advised to refer to that document to gain a full understanding of the environmental and other sustainability implications of the proposed WLWP.

## Risk Management Implications

40. 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 DPDs are required to comply with the legal requirements for preparing and consulting on DPDs under the Planning and Compulsory Purchase Act.	Officers will seek to ensure compliance with the relevant legislative requirements, including the undertaking of Sustainability Appraisal, Equalities Impact Assessment and requirements for consultation. A log is to be maintained that chronicles legal compliance as the DPD progresses towards examination and adoption.
Changes to the plan-making system	The Localism Act 2011 amends both the Planning Act 2008 and the Planning and Compulsory Purchase Act 2004. A new National Planning Policy Framework is also currently the subject of consultation. The process for preparing, and content of, Development Plan Documents will need to be consistent with these	Officers will continue to keep abreast of proposals and consultation on changes to the planning legislation and national planning policy. Where potential issues arise, these will be reported to the Member Steering Group for the WLWP and to Harrow's LDF Panel to consider and advise on a way forward.

	changes.	
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 DPD includes a contingency that would allow for one or even two allocated sites not to come forward. It also 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 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 will need to work 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.

41. The WLWP is being prepared jointly. A memorandum of understanding has therefore been signed by six West London boroughs, which details the working arrangements. However, careful planning will be necessary to ensure that individual borough issues and concerns, political sensitivities, community involvement and decisions making processes are consistent to ensure the Plan is developed in accordance with the revised LDS timeframe.

## **Equalities implications**

42. Was an Equality Impact Assessment carried out? Yes

43. Equalities Impact Assessment (EQIA) for DPDs is an iterative process. An equalities impact assessment will be undertaken of the Site Allocations DPD. This will build on the previous EQIA prepared for the WLWP Proposed

Sites and Policies Consultation document, and will be published along side publication of the Plan.

## Corporate Priorities

44. The completion of key LDF documents, including the WLWP, is a corporate priority for Place Shaping that will enable the Council to better manage waste in the Borough and avoid costs associated with the current practice of exporting the majority of our waste for disposal to landfill. It will assist in the delivery of other corporate priorities relevant to building stronger communities and delivering cleaner and safer streets.

Please identify which corporate priority the report incorporates and how:

- Keeping neighbourhoods clean, green and safe.
- United and involved communities: A Council that listens and leads.
- Supporting and protecting people who are most in need.
- Supporting our town centre, our local shopping centres and businesses.

## Section 3 - Statutory Officer Clearance

Name: Kanta Hirani	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 29 November 2011		
Name: Abiodun Kolawole	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 22 November 2011		

## Section 4 - Contact Details and Background Papers

Contact: Matthew Paterson, Senior Professional Policy Planning, Development and Enterprise, phone 02087366082

Background Papers: WLWP Issues and Options Consultation Document (January 2009); Sustainability Appraisal of the WLWP Proposed Sites and Policies Consultation Document (February 2011); Equalities Impact Assessment; O&S Committee Report of 2 November 2010 LDF Panel Report of 9<sup>th</sup> November 2010 Cabinet Report of 18<sup>th</sup> November 2010

West London Waste Plan Proposed Sites and Policies Consultation document, February 2011  
West London Waste Plan Proposed Sites and Policies Consultation: Consultation Responses - CAG Consultants, July 2011  
Site Deliverability Assessment (September 2011)



## West London Waste Plan

Proposed Sites and Policies Consultation  
**SUMMARY REPORT**

June 2011

# **West London Waste Plan Proposed Sites and Policies Consultation: Summary Report**

A report from **CAG Consultants**

June 2011

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# Executive Summary

This report is a summary of the responses received to the consultation carried out on the West London Waste Plan (WLWP) Proposed Sites and Policies report. The consultation was conducted during February and March 2011.

A total of 374 responses were received, using the online questionnaires, and by direct email and written contact. In addition 2430 people signed 3 petitions, and comments were recorded from 3 public meetings.

Of the consultation comments, 75% of respondents objected to one or more of the proposed sites<sup>1</sup>.

One third of submissions<sup>2</sup> were against the sites proposed for Park Royal. Many of these were impassioned pleas from local residents with significant fears about the impacts of the sites. In addition a 193- signature petition against the sites was received. The site which received most specific separate objections was 191 (Atlas Road), closely followed by 186,187,182, and 183. The main issues mentioned were: the unfairness of locating so many sites in the area; the cumulative impact of new sites when added to existing waste and industrial facilities; proximity to housing; increased traffic; air pollution and the health impacts of pollution.

The proposed new site at Tavistock Rd Coal Depot in West Drayton (site 241) received the most objections (67) of any single site. As with Park Royal, many of these were from local residents with significant fears about the impacts of the site. Two petitions were submitted against the site with a total of 2237 signatures. The main issues mentioned were: the location of the site close to three residential estates; its likely impact on the local residents; the impacts of traffic and congestion and related impacts of air pollution and health.

Comments were also received on the four policies proposed for the Plan. Key concerns were that policies should ensure that sites are not located close to housing and that protection for local residents should be strengthened.

All the sites and policies included in the Plan will now be reviewed, taking account of the consultation comments and the results of a deliverability assessment<sup>3</sup>. It is intended to produce a new Plan with a revised list of sites and updated policies, which will be available for comment by the end of 2011.

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<sup>1</sup> Responses to the technical questionnaire are not included in this analysis, as there were two separate site questions in that questionnaire.

<sup>2</sup> 34% of responses (excluding the technical questionnaire) were against one or more Park Royal sites.

<sup>3</sup> A detailed assessment of each site's suitability and availability for waste use.



# 1. Introduction

## 1.1 This report

This report is a summary of the responses received to the consultation carried out on the West London Waste Plan (WLWP) Proposed Sites and Policies report. The consultation was conducted during February and March 2011. This version of the report was published online on July 10th 2011. It contains some minor amendments for accuracy to the earlier version published online on July 3<sup>rd</sup>.

The first section outlines the consultation which has been carried out and the level of response received. Section 2 summarises the key issues arising from the consultation, and the responses to each of the consultation questions. It also includes initial WLWP responses to the key issues. These comments will be considered during the preparation of the next stage of the Plan which will be produced later this year. It will include a revised list of sites.

## 1.2 Summary of consultation

The West London Waste Plan will, once adopted, provide a framework of identified sites suitable for waste facilities and for meeting West London's future needs for the management of all waste streams and types. The West London Waste Plan will become part of the Local Development Framework of each of the local authorities involved.

Six west London Boroughs (Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames) have joined together to prepare the West London Waste Plan. They are employing [Mouchel](#) and [CAG Consultants](#) to help them develop the Plan, and to make sure that local people have their say.

The programme of consultation on the Proposed Sites and Policies report included the following elements:

1. An information leaflet (front and back page shown), providing information about the report and the consultation, which was distributed by the six boroughs.

## How can you be involved?

### drop in sessions

Come along to see and discuss the proposals at:

Brent: 28th February 2011, 1pm-8pm, Bridge Park Community Leisure Centre, Brentfield, Harrow Road, London NW10 0RG

Ealing: 8th March 2011, 1pm-8pm, Priory Community Centre, Acton Lane, Acton, W3 8NY

Harrow: 18th February 2011, 2pm-8pm, Committee Room 5, Harrow Civic Centre, Civic 1, Station Road, Harrow, HA1 2XY

Hillingdon: 10th March 2011, 1pm-8pm, Botwell Library, East Avenue, Hayes, UB3 2HW

Hounslow: 1st March 2011, 1pm-8pm, Civic Centre, Lampton Road, Hounslow, TW3 4DN

Richmond upon Thames: 3rd March 2011, 1pm-8pm, Atrium of the Civic Centre, 44 York Street, Twickenham

### website

See [www.wlwp.net](http://www.wlwp.net) for details of the Plan. You can also give your views using the simple online questionnaire, or by email to: [consultation@wlwp.net](mailto:consultation@wlwp.net)

### phone

Use the freephone number 0800 389 4276 to find out about the plan

### in writing

CAG Consultants, West London Waste Plan Consultation Gordon House, 6 Lissenden Gardens, London NW5 1LX

The Proposed Sites and Policies document and copies of the consultation questionnaire are available in all borough libraries and main council offices.

West London currently produces enough waste to fill Wembley Stadium every 2 years ...

Consultation on Proposed Sites and Policies Document

From 9th February to 25th March 2011

see inside ...

how you can find out what is planned

how you can have your say

**wlwp**  
west london waste plan  
planning for West London's waste

Figure 1 consultation leaflet

2. Articles on the consultation programme were published in each of the borough's newsletters.
3. Six drop-in sessions, one in each of the boroughs. These were staffed by planning officers from the relevant boroughs along with consultants from CAG and Mouchel. Residents and organisations on the consultation databases of the six boroughs' planning departments were invited to the sessions. The sessions were also advertised in local newspapers and a press release resulted in additional press coverage.
4. Copies of the Proposed Sites and Policies report and associated technical reports were made available on the WLWP website ([www.wlwp.net](http://www.wlwp.net)) and in Council offices and libraries across the six boroughs.
5. Two questionnaires were used seeking responses on the proposed sites and policies (see Appendix A). Paper copies were provided alongside the report, an interactive electronic version of the questionnaire was also provided for completion online, and the questionnaires were also made available for download from the website.
6. The project team also attended meetings in West Drayton, North Acton and Twickenham. Local residents groups near to proposed sites were also contacted directly by CAG Consultants to offer the opportunity for an additional meeting with the project team.

7. Written and email feedback was invited via the information leaflet and poster, project website and during the drop-in sessions.

### 1.3 Level of response

In summary:

- over 120 people attended the 6 drop-in sessions;
- 82 people attended the 3 additional meetings;
- 248 online questionnaires were completed;
- 126 additional written and email submissions were made; and
- 3 petitions were submitted.

Details are shown in the table below.

**Table 1 Consultation submissions**

Short questionnaires completed	180
Technical questionnaires completed	68
Email and written submissions	126
Petition against proposed Park Royal sites (signatures)	193
2 petitions against proposed Tavistock Road site (signatures)	2201
	36
<b>Total</b>	<b>2804</b>

## 2. Key issues

The following table provides an overview of the key issues arising from the consultation submissions, and gives an initial response. Each of these is described in more detail in the subsequent sections of this report.

**Table 2 Key issues**

Issue	Details	Initial WLWP response
Site selection	Of the consultation comments, 75% of respondents objected to one or more of the proposed sites <sup>4</sup> . The Environment Agency response noted a number of issues that need to be considered when assessing sites.	All the consultation comments will be reviewed and taken into consideration when assessing the sites and deciding whether to take them forward into the final Plan. Issues to be addressed will include deliverability (whether it is likely to be available for development), flood risk, groundwater and protection of the river corridor. As part of this process, there will be a detailed assessment of each site's suitability and availability for waste use. The assessment will include: an assessment of the site's potential to accommodate a waste facility; the identification of the freehold, leasehold and occupier interests on site; site visits; and contacting land owners to confirm the sites are deliverable.
Inclusion of Park Royal sites (existing sites 352, 328, proposed new sites 386,129,186, 187,183,182,191)	One third of submissions <sup>5</sup> were against the sites proposed for Park Royal. Many of these were impassioned pleas from local residents, with significant fears about the impacts of the sites. In addition a 193- signature petition against the sites was received. The main issues mentioned in the objections were: the unfairness of locating so many sites in the area; the cumulative impact of new sites when added to existing waste and industrial facilities; proximity to housing; increased traffic; air pollution and the health impacts of pollution.	All the Park Royal sites will be included in the assessment of the sites to be taken forward in the Plan. This will take account of deliverability and all the consultation comments, and will consider local concerns including existing air quality and the cumulative impact of existing and proposed sites, in addition to the issues mentioned above. Of the existing sites, the London Plan requires these to be safeguarded for waste management use, but the deliverability

<sup>4</sup> Responses to the technical questionnaire are not included in this analysis, as there were 2 separate site questions in that questionnaire.

<sup>5</sup> 34% of responses (excluding the technical questionnaire) were against one or more Park Royal sites.

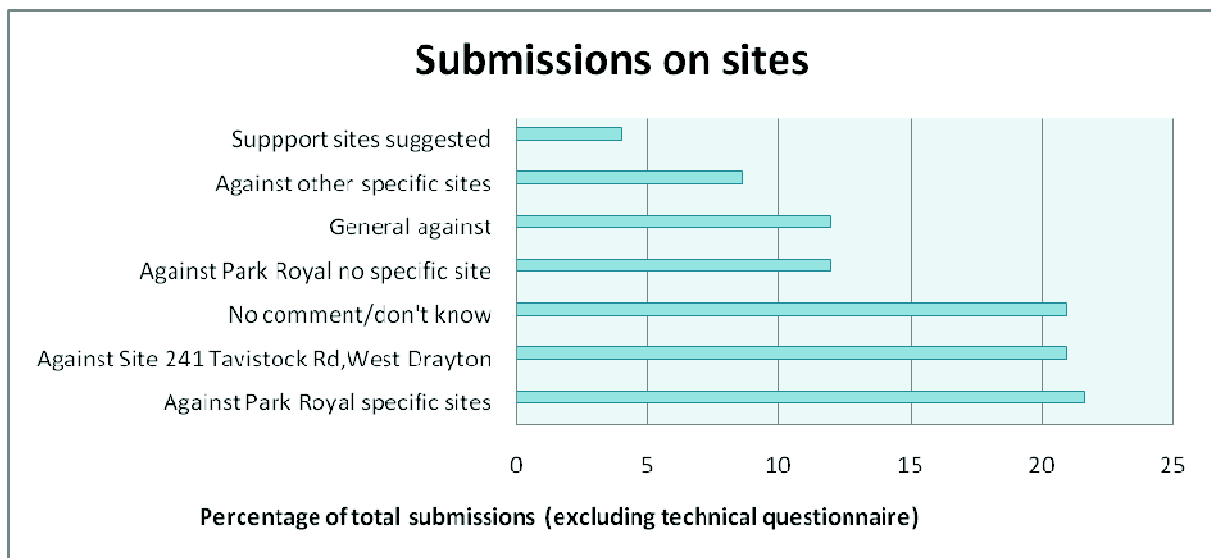
	<p>A number of submissions addressed the site assessment procedure, suggesting that the weighting on transport accessibility resulted in the impacts on local residents not being properly considered. It was also suggested that existing air quality and the cumulative impacts of more than one site should be included in site assessments.</p>	<p>assessment will consider whether they will be highlighted in the final Plan as having potential for re-development.</p>
<p>Inclusion of Tavistock Rd Coal Depot (site 241)</p>	<p>This proposed new site (site 241) received the most objections (67) of any single site. In addition 2 petitions were submitted against the site; one with 2201 signatures and the other with 36 signatures. As with Park Royal, many of these were from local residents with significant fears about the impacts of the site. The main issues mentioned in the objections and the petitions were: the location of the site close to three residential estates; its likely impact on the local residents; the impacts of traffic and congestion and related impacts of air pollution and health.</p> <p>There were specific criticisms of the site scoring system, particularly, that the weighting given to proximity to residential areas has not been consistently applied.</p>	<p>The site will be reviewed in the assessment of sites to be taken forward in the Plan. This will take account of deliverability and the feedback received on the site during consultation including local concerns regarding the closeness of residential estates and transport impacts.</p>
<p>Does policy 1 need to be changed to reflect concerns expressed?</p>	<p>More people disagreed with policy 1 than agreed. A key concern was that the sites should not be located close to residential communities. Other concerns were the fact that the Plan is technology neutral and a plea (from the waste sector) for greater flexibility so that new sites could be considered in the future.</p>	<p>Scores for proximity to residential areas will be reviewed where required to ensure scoring is realistic and robust.</p>
<p>Can policy 2 be strengthened to better protect local residents and ensure sustainable transport?</p>	<p>A number of criticisms were made about this policy. Key suggestions were strengthening the sustainable transport requirements, strengthening the protection of local residents, taking account of the views of local residents, taking account of cumulative impacts of a number of sites and ensuring effective monitoring.</p>	<p>This policy will be reviewed in light of the comments received.</p>
<p>Can policy 3 be strengthened to</p>	<p>While there was considerable support for this policy, a number of concerns</p>	<p>This policy will be reviewed in light</p>

protect local communities and avoid affecting recycling?	were expressed, particularly about the impacts of particular technologies on local communities, and the potential negative impact on recycling rates.	of the comments received.
Does the requirement in policy 4 for 10% of materials to be reused/recycled need to be increased?	One third of those who expressed an opinion on Policy 4 considered that the 10% figure was too low.	This policy will be reviewed in light of the comments received.

# 3 Sites

## 3.1 Summary

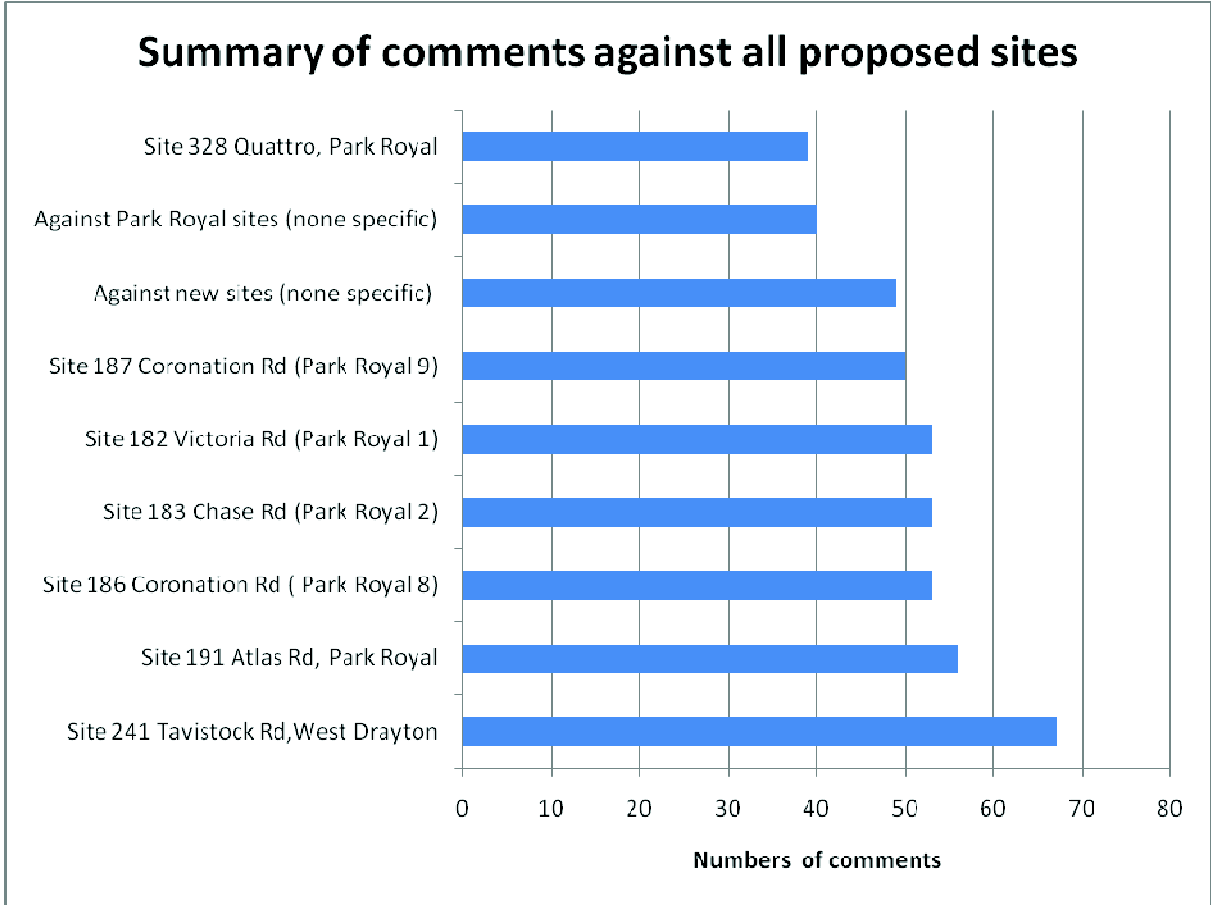
The overwhelming focus of the consultation responses was on the 24 sites proposed for potential waste management use. The main objections were to site 241 (Tavistock Road Coal Depot West Drayton) and to the proposed sites at Park Royal. In addition to individual responses, the proposals against Tavistock Road and Park Royal sites were the subject of petitions. The chart below summarises the percentages of submissions commenting on sites. Looking at the combination of online responses to the short questionnaire and the other submissions, 75% were against some of the sites<sup>6</sup>.



**Figure 2 Breakdown of submission on sites**

<sup>6</sup> Responses to the technical questionnaire are not included in this summary, as there were 2 separate site questions in that questionnaire.

The numbers of all comments against proposed sites are shown in the chart below (only sites with more than 10 objections shown)<sup>7</sup>.



**Figure 3 Summary of comments against all proposed sites**

### 3.2 Park Royal sites

The consultation document included 2 existing sites and 6 proposed new sites in Park Royal. These are shown in the following table.

<sup>7</sup> Includes technical questionnaire comments and comments against more than one site in the same submission



**Table 3 Park Royal sites**

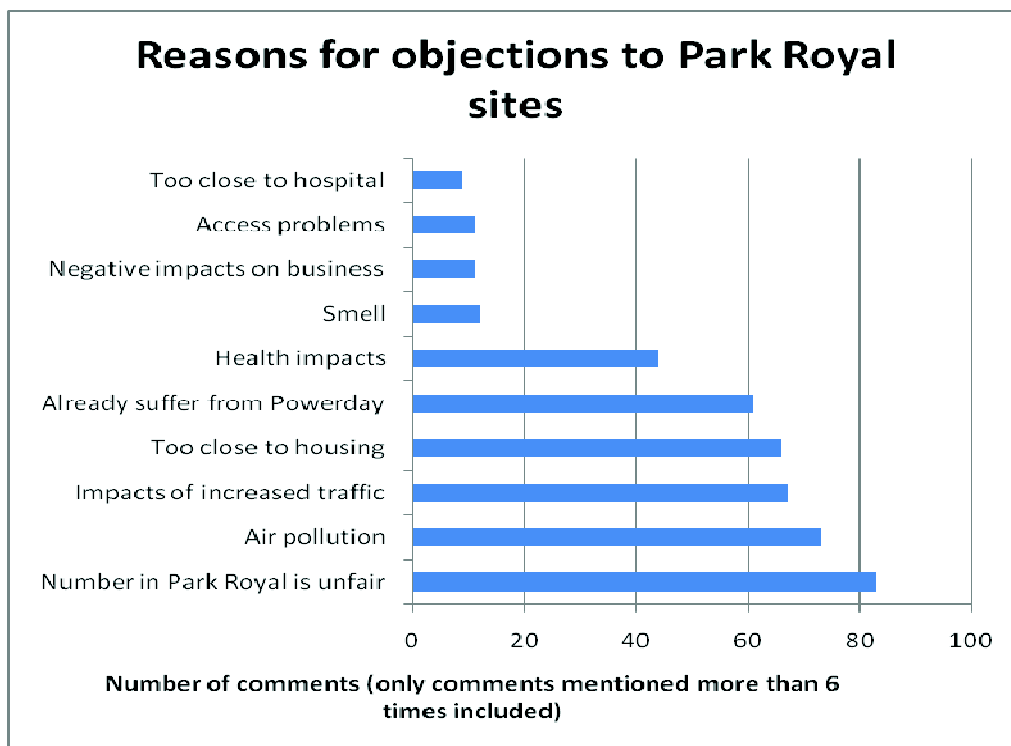
<b>Existing waste sites considered to have the potential for redevelopment</b>		
<b>Site</b>	<b>Borough</b>	<b>Description</b>
352	Brent	Twyford Waste Transfer Station
328	Ealing	Quattro, Victoria Road, Park Royal
<b>Proposed new sites with opportunity for developing waste management facilities</b>		
386	Brent	Abbey Road, Park Royal
129	Brent	Brent Rail Sidings, Premier Park Road, Park Royal
186	Ealing	Park Royal 8 (Coronation Road)
187	Ealing	Park Royal 9 (Coronation Road)
183	Ealing	Park Royal 2 (Chase Road)
182	Ealing	Park Royal 1 (Victoria Road)
191	Ealing	Atlas Road Park Royal

As noted earlier, one third of submissions<sup>8</sup> were against the sites proposed for Park Royal. In addition a 193 signature petition against the sites was received. There was also a public meeting against the sites, attended by over 50 people.

Many of the submissions expressed objections to either the Plan itself (for example the petition), to 'the proposed new waste sites in Park Royal' (wording in a form letter submitted by 33 residents) or to groups of sites. The site which received most specific separate objections was 191 (Atlas Road), closely followed by 186,187,182, and 183. Of the proposed new sites 386 and 129 received fewer objections. Of the existing sites, there was a significant level of objection against site 328 (Quattro site) but much less against 352 (Twyford Waste Transfer Station). The following chart shows the main reasons given for objecting to the sites.

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<sup>8</sup> 34% of responses (excluding the technical questionnaire) were against one or more Park Royal sites



**Figure 4 Reasons given for objecting to Park Royal sites**

Many of the responses received were impassioned pleas from local residents. A frequent argument was that the area already bears its fair share of waste and industrial sites. In particular many respondents referred to their experience of living close to the Powerday MRF, and of the noise, smells and heavy traffic connected to this facility. The residents that responded have strong fears that any future waste plants would have a similar range of impacts. The impacts of the existing Quattro site were also mentioned. This was reflected by the wording of the petition, shown in the box below.

*We the undersigned wish to object most strongly, to the proposed West London Waste Plan, and to its affects on our area. The plan appears to entail lots of extra lorries bring(ing) rubbish from outside our area to be tipped and sorted beside our homes. Then to be stored or transported by yet more lorries. The whole plan promises lots of extra lorries rubbish dust pollution obnoxious smells rats and other rodents around our homes hospitals and schools. Creating yet more traffic on roads which are already jammed solid for most of the day.*

The concern about the impacts of traffic is reflected throughout the responses. Noise and air pollution, and the health impacts of the pollution was a major concern frequently mentioned. The following comment from the Wesley Estate Residents' Association reflects the concerns on air quality.

*Many parts of Ealing borough suffer from poor air quality with high concentrations of PM<sub>10</sub> and NO<sub>2</sub> in many areas. Transport is the main source of these pollutants, particularly the road*

*corridors with heavy goods vehicle flows such as the A40, A406 and the A4020.*

*Chase road is used every night as a rat run from gipsy corner through to A406. Heavy lorries up and down the narrow road; shake the houses to the very foundations.*

*Ealing borough is an Air Quality Management Area and the Council has three automatic monitoring stations in close proximity to many of the proposed sites in Park Royal (Ealing Hanger Lane Gyrotory, Ealing Western Avenue, Acton and Ealing Horn Lane, Acton), all of which monitor PM<sub>10</sub> and NO<sub>2</sub>. These regularly exceed national air quality objectives and EU targets, and one of the monitoring stations (Ealing Horn Lane) has recorded some of the highest PM<sub>10</sub> pollution levels in the UK. Air pollution in this area was recently the subject of a Parliamentary debate.*

Similar strong opposition was expressed at a public meeting<sup>9</sup> organised by the Wesley Estate Residents' Association. The meeting was attended by 53 residents, and there was unanimous opposition to the proposals. Attendees objected to the number of sites included in Park Royal, their proximity to local residents and the impacts of traffic and pollution.

Other consultation responses commented on the criteria used to select the sites. Key points were:

- The criteria did not include air quality impacts, or take account of current air quality, including Air Quality Management Areas;
- The site selection did not adequately consider the cumulative impacts of existing waste facilities;
- The weighting given to transport access and the use of sustainable transport options (rail and canal) unfairly favoured transport benefits over impacts on local residents; and
- In addition, it was suggested that the sustainable transport was unlikely to be delivered. This was based on the current experience of the Powerday plant, which it was claimed is not using the canal despite expectations that it would.

A number of local residents' and community groups made submissions against the sites. These included Wesley Estate Residents' Association, West Acton Residents' Association, Titra (the Island Triangle Residents Association), Wells House Residents' Association, Roxborough Road Residents' Association and Ealing Civic Society.

A number of local businesses also objected, citing negative impacts on business and employment. This included: Vale Europe which objected to site 183; Tarmac which objected to site 186; SEGRO Plc which objected to sites 352, 328, 129, 186, 187, 182, and 183; and Ashia Centur Ltd and Century City which objected to site 386.

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<sup>9</sup> Held in North Acton on 2<sup>nd</sup> March 2011

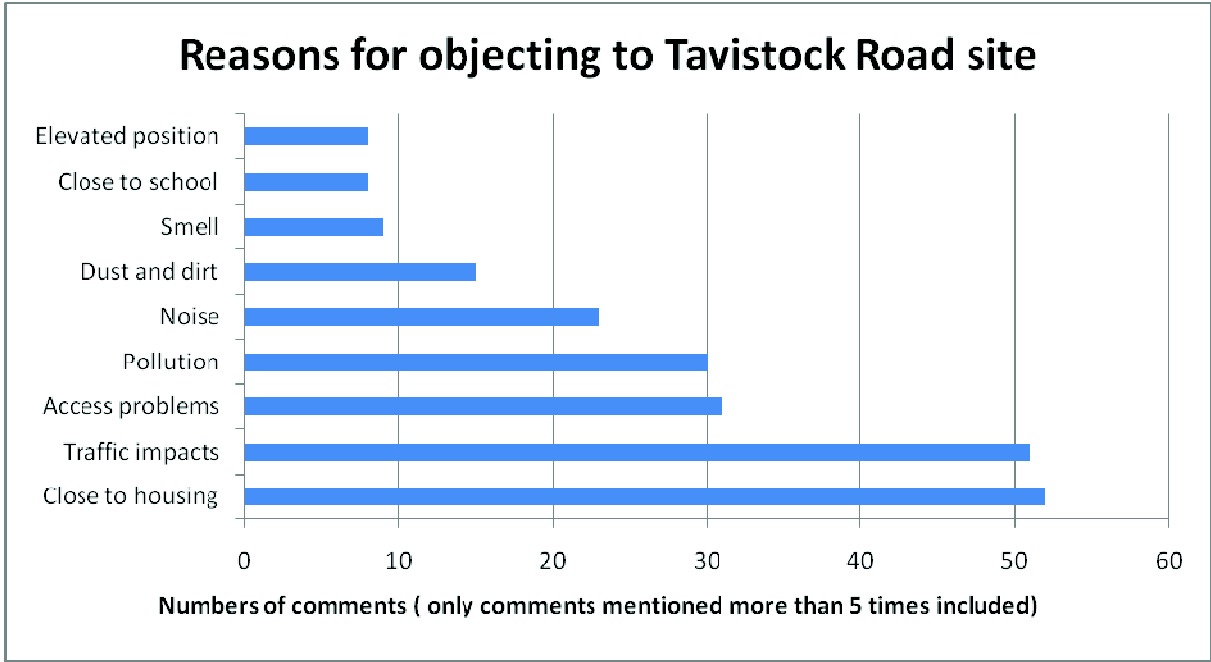
In addition, the Park Royal Partnership, which supports the local area from a business growth and employment perspective also made a submission. It made comments on the sites, objecting to some on the basis of loss of employment land and business premises and potential vehicle movements (182, 183, 186 and 187). However it supported the inclusion of the existing sites (352 and 328) and the proposed new sites 191, 386 and 129.

A range of other objections were made to specific sites and these are listed in Appendix B.

### 3.3 Tavistock Road Coal Depot

This proposed new site (site 241) received the most objections (67) of any single site. In addition 2 petitions were submitted against the site; one with 2201 signatures, and the second with 36 signatures and it was the focus of a meeting of the Yiewsley & West Drayton Town Centre Action Group, attended by over 20 people<sup>10</sup>.

The chart below shows the main reasons given for objecting to the proposal.



**Figure 5 Reasons given for objecting to Tavistock Road site**

As with the Park Royal responses, many of the objections were strong pleas from local residents. They were supported by local residents’ associations, particularly the Garden City Estate Residents’ Association (GCERA), which organised both petitions and

<sup>10</sup> Held at Key House, 106 High Street, West Drayton on Wednesday 2<sup>nd</sup> March 2011

made a comprehensive submission against the site. Objections were also received from Hillingdon Alliance of Residents' Associations, Hayes and Harlington Community Development Forum, Hayes Conservation Area Advisory Panel, West Drayton Safer Neighbourhood Team, London Borough of Hillingdon Labour Group, South Buckinghamshire District Council, and John Randall MP.

As shown in the table, the two key areas of concern were traffic and access issues, and the site's impact on nearby housing. These concerns were also the focus of the meeting of the Yiewsley & West Drayton Town Centre Action Group.

Traffic and access issues were mentioned in almost all submissions. It was suggested that the site is capable of generating in the order of 120,000 heavy goods vehicle movements per annum. In general there were concerns about the impacts of this amount of traffic on local people, particularly in terms of increased traffic congestion, noise, pollution, and road safety. GCERA suggested that, were a Transport Impact Assessment done it would *'prove that the Coal Yard site should not be used for Waste Processing because of the inevitable large increase in vehicle traffic in local roads, given the large size of this site; a general problem that would be exacerbated should the site usage be for industrial waste processing, or processing of wastes collected by vehicles servicing the 6 boroughs.'*

A number of specific traffic and access issues for the site were identified. These are shown in the table below.

**Table 4 Traffic and access issues mentioned in submissions**

- The local roads are already highly congested, and this will be increased by the opening of a new Tesco store, and by new residential development.
- The site has a difficult and restricted access from a residential road off the main high road. For northbound traffic the residential road is a sharp left turn immediately after going under the railway bridge where the main road is at its narrowest and is subject to flooding.
- There is only one way into and out of the site by a narrow ramped access way. There will therefore be queuing of traffic which is likely to have significant impacts on the local area and residents.
- All heavy goods traffic would have to come through the town centre. It was suggested that local residents have already said (in comments on the Local Transport Plan) that they want only cars, vans and buses to have access. through Yiewsley/West Drayton town centre.
- The main road is on the routes to several local schools.
- The amount of heavy goods vehicle traffic will worsen air quality in the Air Quality Management Area.
- The opportunity to use rail access, which is why the site scored highly, is limited to the transportation of materials from the site. Waste will still arrive at the site by truck.
- One local resident has already been killed in recent years by a heavy goods vehicle from this site driving through the town centre.
- Large left-turning vehicles accessing the site from the south cannot turn into Tavistock Road in one movement. Some large vehicles accessing the road at present turn into the bus turning area at the West Drayton train station in order to turn and access the road with a right turn.

The location of the site close to three residential estates and its likely impact on the local residents was mentioned by almost all objectors. In addition to the impacts of traffic and congestion, there were many concerns expressed about the impacts of any facility on local residents. Key concerns were noise, smells, pollution, and dust. Other feared impacts were an increase in rodents, flies and light pollution. The elevated nature of the site was frequently mentioned as it was feared that it would exacerbate impacts on local residents such as noise and visual amenity.

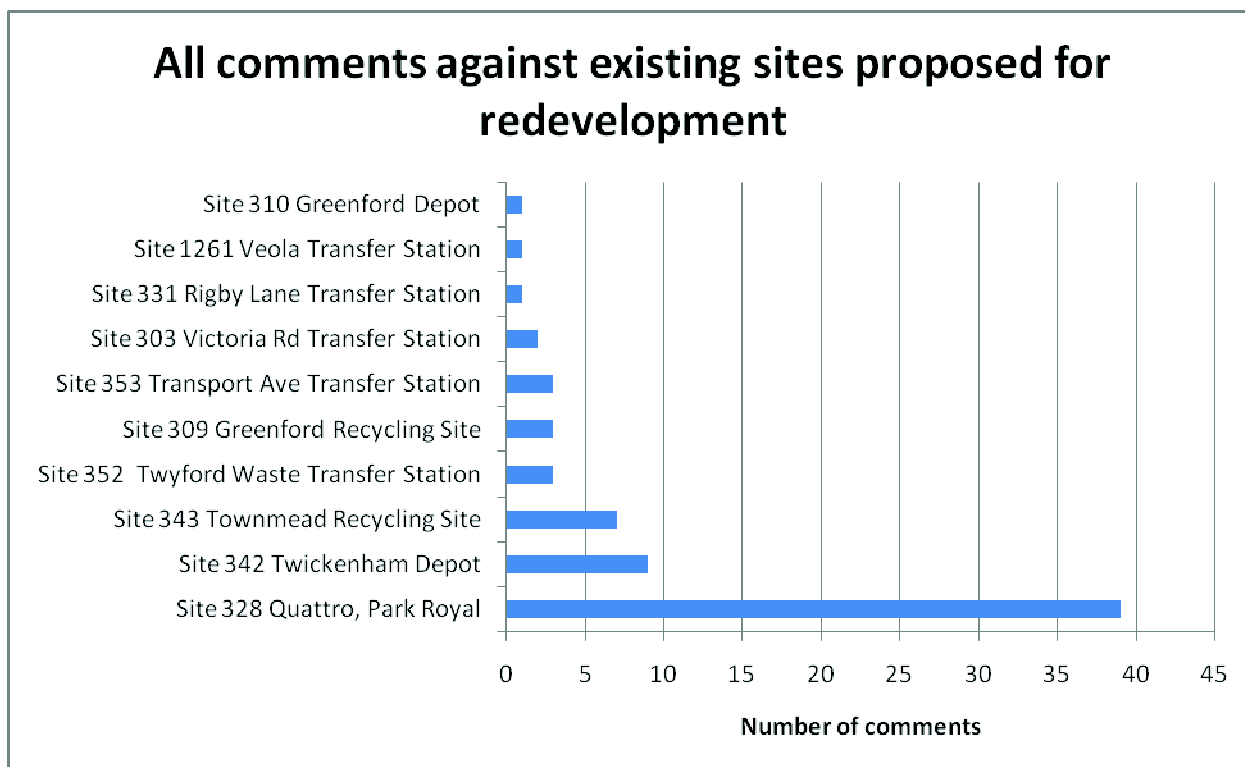
In addition to impacts on residents, consultees suggested it would affect local schools and businesses, and have a negative effect on regeneration of the area. Other concerns mentioned were the impacts on the nearby nature reserve, the Green Belt and the Colne Valley Regional Park. It was also suggested that the site would be affected by the Crossrail development.

A submission from the Garden City Estate Residents' Association criticises the application of the scoring system that led to the site being shortlisted. It suggests that the weighting given to proximity to residential areas has not been consistently applied, and that where double weighting has been used (for vehicle routing) the negative impacts have not been fairly represented.

A submission in support of the proposal was received from Powerday, which is understood to be preparing an application for a Materials Recovery and Recycling Facility and potential Civic Amenity provision on this site. They have noted that it is not constrained by any national or local environmental designations and that a detailed environmental assessment has already been undertaken. Powerday also noted that their proposal involves the use of sustainable transport by making use of an existing siding with direct access on to the main rail network. They suggest that the redevelopment of the site from the existing open storage and yards to a *'more homogenous structure'* (presumably a contained building) *'could improve the appearance, noise and dust impacts on the surrounding area'*.

### **3.4 Other existing sites proposed for redevelopment**

The numbers of comments against individual existing sites proposed for redevelopment are shown in the following chart.



**Figure 6 Total numbers of comments against existing sites proposed for redevelopment**

Apart from the Park Royal Sites already discussed, the two sites which received the most objections were the Twickenham Depot (site 342) and Townmead Reuse and Recycling Site (site 343). The Twickenham Depot received 9 objections and Townmead received 7 objections.

The objections<sup>11</sup> received for all the existing sites outside Park Royal are summarised in the table below.

**Table 5 Objections against existing sites (excluding Park Royal)**

Site	Borough	Description	Objections Received	Main reasons for objecting
1261	Brent	Veolia Transfer Station, Marsh Road Alperton	Ealing Civic Society	River Brent suffers pollution from existing uses, and access is limited by congestion.
309	Ealing	Greenford Reuse and Recycling Site	GLA, Ealing Civic Society and one other	Reuse and recycling provision should be retained (GLA and one other submission) Unsuitable for expansion of use, because it visually dominates the Brent

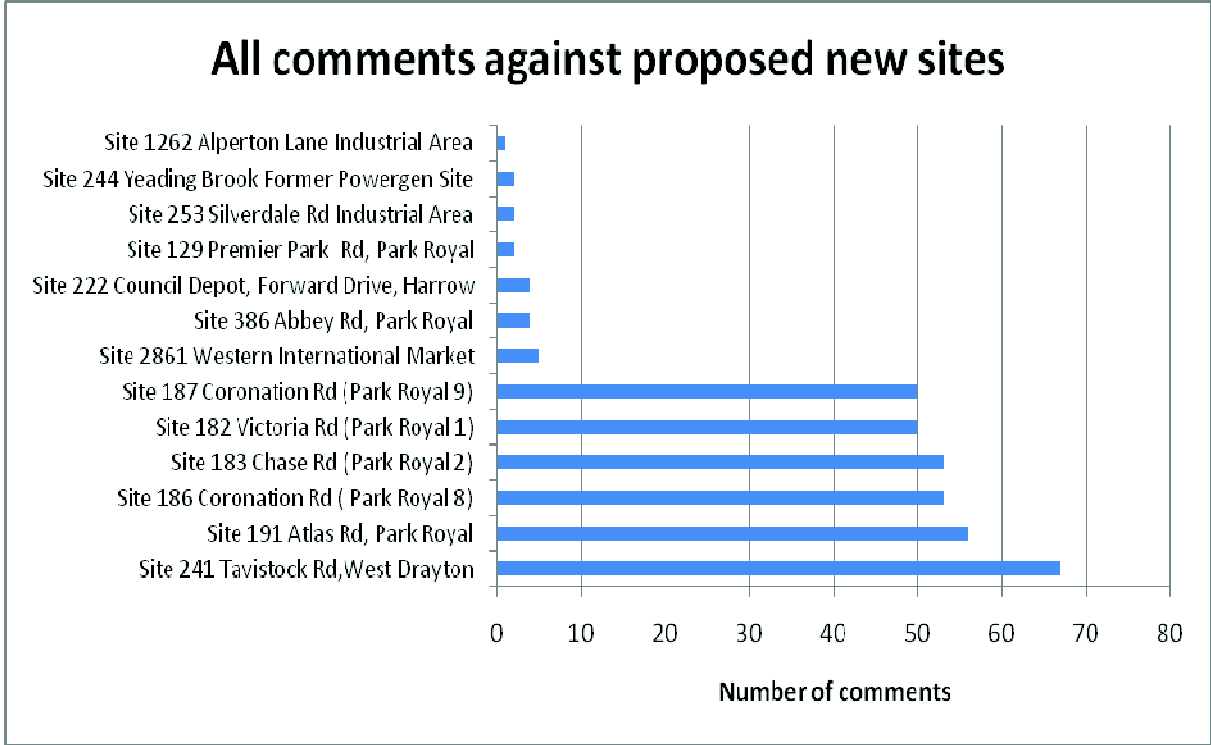
<sup>11</sup> Includes responses where issues are raised without a clear objection being stated

				River Park in a narrow section and is very close to housing and a secondary school. Brent River Park is Municipal Open Land (MOL) which is protected by the Ealing LDF.
310	Ealing	Greenford Depot	Ealing Civic Society	Close to the River Brent. LDF requires development adjacent to MOL to respect their purpose, sense of openness or environmental character.
331	Hillingdon	Rigby Lane Waste Transfer Station	Wells House Residents	Concern about HGV traffic.
303	Hillingdon	Victoria Road Waste Transfer Station	Ruislip Residents Association and Ealing Civic Society	Concern about loss of existing facility and potential impact of HS2 rail development. Proximity to housing and Green Belt land.
353	Hounslow	Transport Avenue Waste Transfer Station	GLA, SEGRO Plc and GlaxoSmith Kline (GSK)	Possible problems with access and parking (GLA). Negative impact on the long term viability of the adjacent West Cross Industrial Park. Concerns about traffic congestion, air quality and road safety and noise, dust and pollution impacts on nearby occupiers including GSK.
342	Richmond	Twickenham Depot	GLA and 8 objections from local residents (including FORCE (River Crane Friends))	Broken into three small sites, so there may be problems in supporting a facility, facilitating traffic movement, and providing the necessary buffering for surrounding land uses (GLA) Impact on the quality of life of local residents and on house prices. There was concern about noise, smell and traffic. Negative impact on Harlequins Rugby Club which is adjacent to the site. Negative impact on the River Crane and conservation area.
343	Richmond	Townmead Reuse and Recycling Site	GLA and 6 objections from local residents	Reuse and recycling provision should be retained (GLA and others). Impact on the quality of life of local residents.



### 3.5 Other proposed new sites

The numbers of comments against individual sites proposed for redevelopment are shown in the chart below.



**Figure 7 Total numbers of comments against proposed new sites**

There were very few objections received for proposed new sites other than Park Royal or Tavistock Road (site 241). The most received for any other single site was 5 against the vacant site at Western International Market (site 2861).

The objections<sup>12</sup> received for all the proposed new sites excluding Park Royal and Tavistock Road are summarised in the table below.

<sup>12</sup> Includes responses where issues are raised without a clear objection being stated

**Table 6 Objections received for proposed new sites (excluding Park Royal and site 241)**

Site number	Borough	Description	Objections/ comments Received	Reasons for objecting
1262	Brent	Alperton Lane Industrial Area, Marsh Lane, Alperton	Park Royal Partnership	Loss of employment land and existing business premises.
144	Brent	Hannah Close, Great Central Way, Wembley	None	
222	Harrow	Council Depot, Forward Drive	Harrow Local Agenda 21 and 3 residents	Impact on residential areas, and access issues.
253	Hillingdon	Silverdale Road Industrial Area	2 objections: Tarmac and Hillingdon Alliance of Residents Associations (HARA)	Site is the largest site within the south-east of England for the production of asphalt materials for highway surfacing. Tarmac considers it to be irreplaceable. The redevelopment of the western part of the Pump Lane Industrial Estate which adjoins Silverdale Road would not be compatible with any waste management uses. Need to use sustainable transport options (HARA).
244	Hillingdon	Yeading Brook	3 comments: English Heritage, HARA and FORCE (River Crane Friends)	Need to protect the canal and brook and footpath links.
2861	Hounslow	Vacant site, Western Industrial Market	3 objections from local residents and 2 comments from SEGRO and English Heritage	Concerns about traffic and access issues (local residents). Adjacent to SEGRO's Heston Centre and Airlinks depot, would like to be consulted. Within the setting of a Grade II listed drinking fountain (English Heritage).

### 3.6 Additional sites suggested

Question 8 of the technical questionnaire asked ‘are there any other sites not already identified that you think would be suitable for waste management facilities?’ This question received 11 responses, of which only 3 referred to specific sites. These were:

- British Waterways noted that the Powerday Materials Recycling Facility at Old Oak Sidings has a wharf on the Grand Union Canal –they considered that while this site falls (just) within LB Hammersmith and Fulham and is therefore not within the WLWP area, it is important to highlight the link to nearby sites so that operators can be encouraged to utilise waterborne methods.
- There were 2 sites suggested by local residents: the Kodak site in Harrow; and the West London Composting site at Harefield.

Four submissions were made by landowners promoting specific sites. These are shown in the table below.

**Table 7 Sites promoted by landowners**

Site	Borough	Landowner	Comment
Stockley Farm Road, Hillingdon	Hillingdon	Kerville Associates	In Green Belt but has been in industrial use since 19 <sup>th</sup> century.
Holloway Lane Sipson	Hillingdon	SITA UK	Sites 3711 and 3712, reviewed but not included within list of existing sites suitable for redevelopment. Exclusion is contested by SITA.
Holloway Close Sipson	Hillingdon	SITA UK	Site 400, reviewed but not included within list of existing sites suitable for redevelopment. Exclusion is contested by SITA.
Additional new sites		SITA UK	SITA state that they may have suggestions of additional sites over the coming months, and would like to bring these forward during the plan making process.
Thorney Mill Road, West Drayton	Hillingdon	Trehaven	Sites largely in and gains access from South Bucks District Council administrative area. Comprises a rail fed aggregates depot and bitumen plant as well as a plant hire yard.
Bedfont Trading Estate	Hounslow	Trehaven	Existing operational commercial waste and industrial site.
Rectory Farm Minerals and Waste Site	Hounslow	Rectory Farm Landowners	Site to be promoted to LB Hounslow for minerals extract with inert landfill. Believe the co-location of inert landfill/recycling facilities for CDE waste could be included.

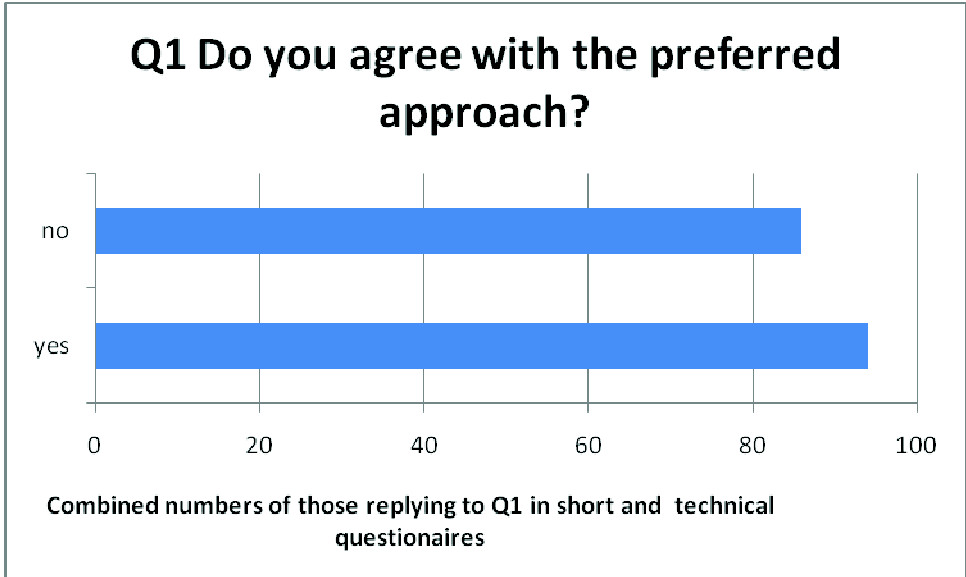
# 4 Other consultation questions

## 4.1 The preferred approach

This question referred to the Plan’s preferred approach of:

*‘meeting the London Plan’s waste predictions plus providing a level of flexibility in the event some sites are not found to be suitable’*

Of those who expressed a view, slightly more agreed with the contingency approach (52%) than disagreed (48%<sup>13</sup>).

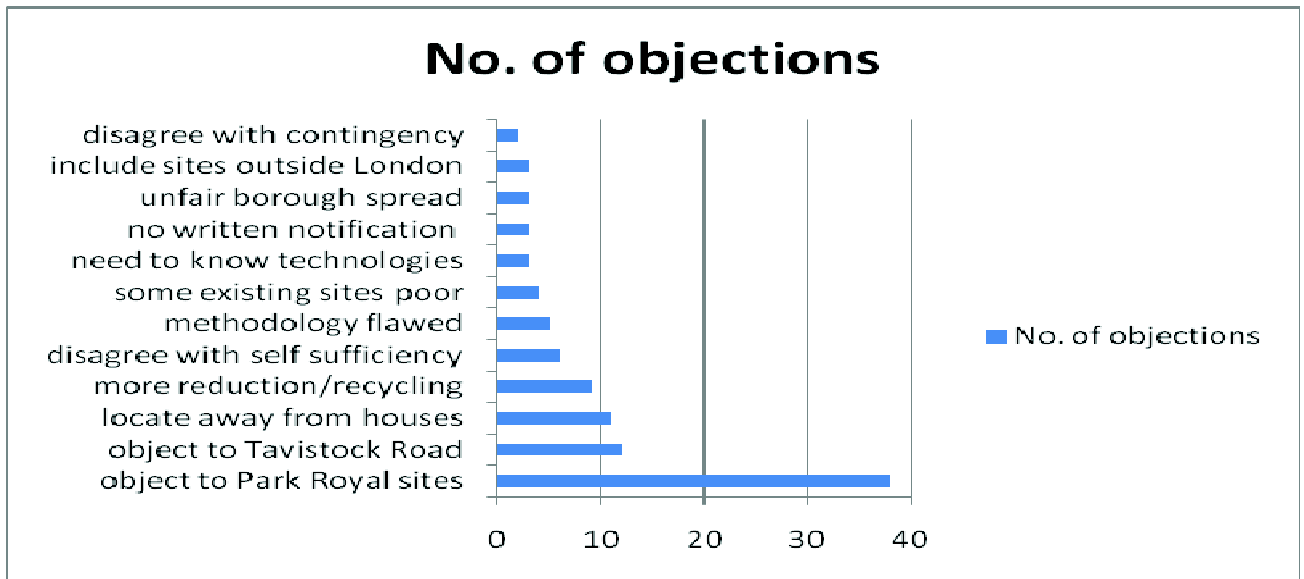


**Figure 8 Views on the preferred approach**

In general, people who disagreed with the approach did so on the basis of opposition to particular sites, or groups of sites, especially Park Royal (38 objections from both questionnaires) and Tavistock Road (12 objections). Only 2 objections actually disagreed with the contingency approach itself.

The figure below shows the reasons for disagreement as set out in responses to both questionnaires.

<sup>13</sup> Taking all responses, 39% agreed, 35% disagreed and 26% didn’t comment.



**Figure 9: reasons for objecting to the preferred approach**

Some relevant comments included:

- **Notification** - concern that not all site owners and occupiers had been contacted.
- **Assumptions about use and capacity** -the Plan proposes that existing waste treatment facilities are assumed to operate at 75% of their licensed capacity (method used for apportionment within the London Plan) and Household Waste and Recycling Centres (HWRCs) at 50%. It was suggested that information on known usage should be used instead. It was maintained that licensed capacity often bears little resemblance to operational capacity and that, for example, HWRCs in Brent, Richmond and Ealing all currently recycle more than 50%.
- In terms of the **contingency**, one respondent suggested that the level of contingency provided for is excessive.

## 4.2 Policies

### 4.2.1 Overview

The Consultation document included 4 policies which would be used to determine planning applications for proposed sites. Both the short and technical questionnaires asked questions about these policies. Overall:

- 19% agreed with all 4 policies;
- 46% didn't answer/didn't know for all 4 policies; and

- 35% either disagreed with some, or didn't express a view on some.

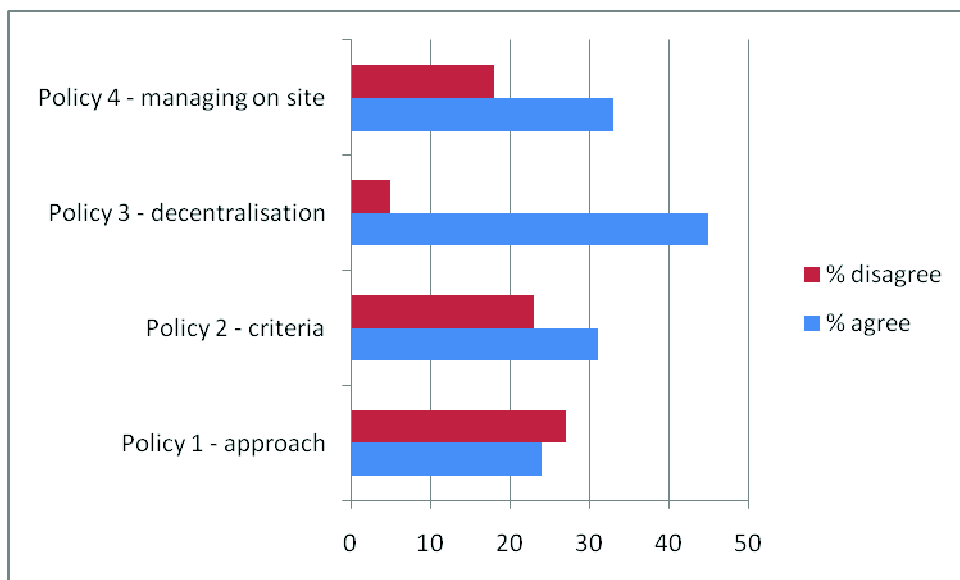
For the Short questionnaire:

- 22% agreed with all 4 policies (out of 180 responses);
- 47% answered 'don't know' or didn't answer the question;
- 31% disagreed with one or more of the 4 policies – although 8% didn't give a reason.

For the Technical questionnaire (62 responses):

- 13% agreed with all 4 policies and 42% didn't answer/didn't know for all 4 policies. The remaining 45% agreed with some and disagreed with others;
- 24% agreed with Policy WLWP1 and 27% disagreed (rest answered don't know or didn't answer);
- 31% agreed with Policy WLWP2, 23% disagreed;
- 45% agreed with policy WLWP3, only 5% disagreed; and
- 33% agreed with policy WLWP4, 18% disagreed.

This is summarised in the chart below.



## Figure 10 Policy summary (technical questionnaire)

### 4.2.2 Key issues

#### Policy 1

- Policy 1 had higher level of disagreement. This was partly due to this 'general approach' policy bearing the brunt of people's concerns regarding waste in particular opposition to various sites;
- The primary concern was that waste sites should not be located close to residential communities, for a variety of reasons (traffic, air pollution, noise, smell etc). People's experiences of current proximity to waste providers appeared a major factor;
- The fact that the Plan was technology neutral was objected to by a number of people as not offering any certainty of what facilities would be developed locally;
- There was also a plea (from the waste sector) for greater flexibility so that new sites could be considered in the future;

#### Policy 2

- In relation to Policy 2, enforcement is the key – many people's experience suggests that such criteria are ignored even when part of the waste licence. Monitoring should be as much about enforcing the prevention of impact to residents and the environment, as it is about tonnages;
- Many comments related to the transport criteria, with support for scoring sites with sustainable modes more highly and support for inclusion of waste transport emissions;
- The cumulative impact of sites clustered in particular areas should be assessed;

#### Policy 3

- Policy 3 concerning decentralisation and 'energy from waste' received strong support – but both those in favour and those opposing this policy agreed that it shouldn't be used to create a preference for incineration;
- Concerns were expressed about the negative impact that 'energy from waste' facilities could have on recycling rates, including plastics;
- The WLWA felt that promoting refuse derived fuel to be used in combined heat and power facilities in London or as a direct replacement for fossil fuels in London may be an impractical suggestion in the short-term, and indeed, possibly for the first five to ten years of the WLWP;

#### Policy 4

- One third of those who expressed an opinion on Policy 4 considered that the 10% figure was too low – this included those that agreed in principle with the policy as well as those who disagreed (indeed this appeared in many cases to be the reason for most disagreement);

#### 4.2.3 Detailed comments

There was some evidence of consultees sending in the same agreed response. Some supported the policies with provisos that all factors are considered ('environment, people, no disruption etc') and that disturbances are kept to a minimum. Others supported the policies, but had objections or concerns in relation to particular sites.

Points made by consultees who agreed with all 4 policies are shown below.

#### Table 8 Points made by consultees who agreed with all four policies

- Need adequate means of controlling noise, dust, litter, odours and other emissions;
- need provision for an Environmental Impact Assessment and an appraisal of the biodiversity impact;
- development to be restricted to an appropriate scale, form and character;
- active consideration to use of the Grand Union Canal (this is particularly relevant to two of the Hayes Town sites and is strongly welcomed by the Hayes Town Partnership);
- adequate attention to the impact on the road network;
- provision for a Health Impact Assessment;
- inclusion of Green Travel Plans (particularly important for Town Centre locations);
- need to develop the policies into more detailed plans, including involvement in private companies;
- how the regulating authorities interpret phrases like 'adequate means of control' and 'no significant adverse effect';
- guidelines for developers need to be enforced and that the canals and railways can be used for bulk carrying to take trucks off the roads;
- importance of the transport impact assessment;
- assessing the impact of odours: are pollution dispersion studies being carried out, if so, how and by whom?

#### Policy WLWP1: Location of waste development

The proposed draft policy WLWP Policy 1 outlines the strategic approach that existing and new sites identified as potential waste development will generally be supported, provided that the proposals comply with other policies in the WLWP and the borough's Local Development Framework. The draft policy wording is shown in the box below.



## Table 9 WLWP Policy 1

Waste development proposals on sites listed in Tables 4-1 and 4-2 will generally be supported, provided that the proposals comply with the other WLWP policies and the borough's Local Development Framework.

Waste development on other sites, not listed in Tables 4-1 and 4-2, may be permitted if the proposals comply with the other WLWP policies and the borough's Local Development Framework, and:

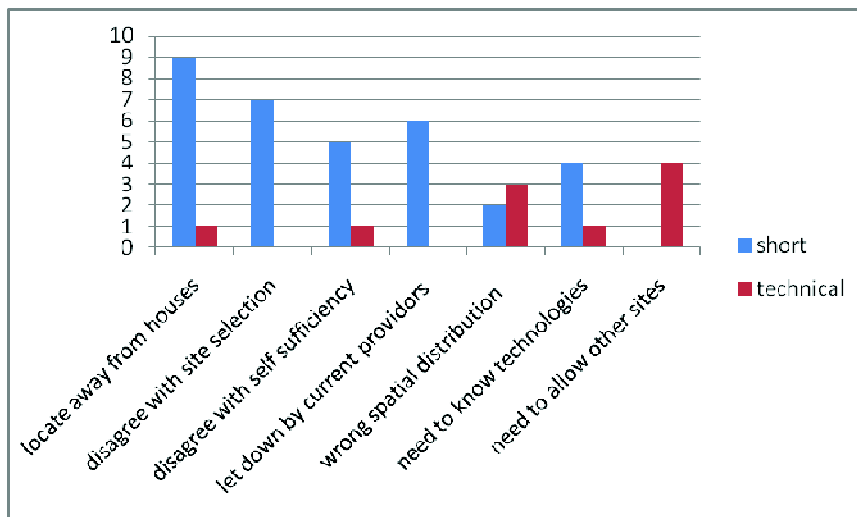
- it can be demonstrated that the development is not suitable for any Sites listed in Tables 4-1 and 4-2; and
- for some reason, identified Sites have not come forward and it can be demonstrated that there is emerging shortfall in capacity.

To ensure no loss in existing capacity, re-development of any existing waste 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 permitted for.

Consultees **supporting** Policy WLWP1 made the following points:

- Concern expressed that WLWA has a long term incineration contract with Grundon at Colnbrook, perceived as diverting from recycling to incineration: *'hope that the possibility of renegotiating the contract and recycling and processing other than incineration will be borne in mind when deciding the amount of land that should be allocated under this plan'*;
- WLWA may need more capacity to deal with commercial and industrial waste and waste which is no longer being incinerated in the future so support the addition of extra suitable sites, provided these are taking waste mainly from West London not a broader geographical area.

The main **objections** to this policy are set out in the chart below.



**Figure 11 Reasons for objecting to Policy WLWP1 (numbers of objections)**

The primary concern was that waste sites should not be located close to residential communities, for a variety of reasons (traffic, air pollution, noise, smell etc). People’s experiences of current proximity to waste providers appeared a major factor, with considerable criticism of Powerday’s site in Park Royal. Many people also re-emphasised their objections to individual sites or groups of sites here too (in particular Park Royal and the ‘West Drayton – Hayes corridor’). Some felt that self sufficiency (London-wide or sub regionally in West London) was; wrong, flawed or undeliverable. The fact that the Plan was technology neutral was objected to by a number of people as not offering any certainty of what facilities would be developed locally. There was also a plea (from the waste sector) for greater flexibility so that new sites could be considered in the future.

Other specific concerns raised by individual consultees are shown in the box below.

**Table 10 Specific concerns about policy 1**

- WLWA had concerns about the last line of Policy WLWP1, suggesting that this line be deleted. This line requires that “to ensure no loss in existing capacity, redevelopment of any existing waste site 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 planned for.” The Authority suggested that this is an unrealistic expectation since “if any form of composting treatment is applied with gestation period measured in days or weeks, this will severely limit the potential through-put of a treatment facility when compared to a waste transfer station arrangement” Surrey County Council thought that the WLWP would be better based on the Draft Replacement London Plan (especially if the waste apportionment has reduced); One Consultee felt that the sites were undeliverable and this meant that the WLWP was unsound;
- One commercial waste operator was aware of unidentified land that it was interested in developing for waste use, but was concerned that identifying it in the WLWP may make waste use commercially unviable. It also felt that conditions stipulated for the development of other sites not allocated within the WLWP are too restrictive. Other concerns or suggestions include: one big facility would be preferable; the Plan should

address waste water and sewerage issues; the level of consultation was insufficient; and criticism of the site selection methodology.

### Policy WLWP2: Ensuring High Quality Development

WLWP Policy 2 aims to ensure high quality development during both its construction and operational phases. The draft policy wording is shown in the box below.

**Table 11 WLWP Policy 2**

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

- adequate means of controlling noise, dust, litter, odours and other emissions are incorporated into the scheme;
- there is no significant adverse effect on the established, permitted or allocated land uses likely to be affected by the development; where necessary this is to be demonstrated by a Environmental Impact Assessment
- 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. An appropriate BREEAM or CEEQUAL rating may be required;
- active consideration has been given to the transportation of waste by modes other than road, principally by water and rail;
- transport directly and indirectly associated with the development will not exceed the capacity of the local road network; where necessary this is to be demonstrated by a Transport Impact Assessment;
- the development makes a positive contribution to climate change adaptation and mitigation to be demonstrated through the submission of a sustainable design and construction statement;
- the development has no significant adverse effects on local biodiversity and that there are no likely significant impacts or adverse effects on the integrity of an area designated under the Habitats Directive;
- there will be no significant impact on the quality of surface and groundwater. A Sustainable Urban Drainage System may be required;
- there will be no increased flood risk in line with PPS25; where necessary this is to be demonstrated by a Flood Risk Assessment;
- there is no foreseeable adverse impact on health; where necessary this is to be demonstrated by a Health Impact Assessment; and
- Green Travel Plans have been considered, where appropriate.

Those **supporting** this policy made the following points:

- One respondent considered that the language contained with WLWP Policy 2 sought to address minimum standards only, *'with not enough provision to encourage positive outcomes'*. For example, they suggested *'active consideration'* for transportation is too vague, and felt that the Plan should go further than this and state that more sustainable modes (i.e. rail and water) are scored higher. They applied the same principal to the point about *'positive contribution to climate change adaptation and mitigation'*, considering that those facilities providing a positive contribution should be scored higher. It was also suggested that the

flexibility (a key over-arching principle throughout the Plan) of waste development proposals should also be considered positively, such that this will provide maximum opportunity to adapt to changes in the market which are inherently difficult to predict beyond the short-term;

- British Waterways supported the requirement for consideration of water use whilst pointing out that this does not require an operator to utilise this method, even if it is viable: *'quite often waterborne freight is found to be viable, but it may be slightly more complicated or expensive than the established practice of road transport and is therefore not taken forward. However, the associated benefits in terms of reduced lorry loads and road-related accidents can outweigh this, and we consider that it should be more proactively encouraged'*;
- Appropriate funding for high quality development must be made available to absolutely minimise impact on residents affected; and
- Whole life cycle is a very important element: future-proofing should be included and invest to save options.

The following comments and amendments were suggested by those **disagreeing** with this policy:

- Make the policy more robust in terms of who arbitrates these criteria – make it clear 'to whom' and for 'how long';
- Consideration for residents should be paramount in these policies;
- Enforcement is the key – many people's experience suggests that such criteria are ignored even when part of the waste licence. Monitoring should be as much about enforcing the prevention of impact to residents and the environment, as it is about tonnages;
- Energy and CO<sub>2</sub> emissions in transporting waste should be included;

There was a degree of scepticism about whether residents views would be listened to and taken on board. It was suggested that previous consultations on waste sites had ignored residents views, and that the monitoring on existing sites does not effectively protect local residents;

- Some felt that the transport implications were too narrowly defined in terms of local road network capacity. It was suggested that they should also be about impacting on the street as a place - particularly important for suburban streets typically largely residential or 'High Streets' (shops etc with residential above). They felt that 'active consideration to transportation of waste by means other than road' is not emphatic enough and should be strengthened. The outputs/products of waste management which may no longer be termed waste should be included so that

recycled material for reprocessing elsewhere is encouraged to be transported other than by road;

- It was felt by some that 'adequate' means of controlling noise, odours etc and 'significant adverse effects' did not sound strong enough: instead the following were suggested - 'stringent' means and demonstrating 'no adverse effects';
- Cumulative impacts need to be considered. It was suggested that greater evidence from monitoring existing sites and view of residents close to existing sites needs to feed into the process of site assessment.

### Policy WLWP3: Decentralised Energy

WLWP Policy 3 encourages all waste facilities capable of producing energy, where practicable and compliant, to contribute to the provision of decentralised energy (i.e. generating local supplies of low carbon energy) in the form of heat and/or power facilities. The draft policy wording is shown in the box below.

**Table 12 Policy WLWP 3**

All waste 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 utilisation of biogas/syngas in Combined Heat and Power facilities, either directly through piped supply or indirectly through pressurisation and transport;
- the utilisation 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 are a recovery facility as defined in the Waste Framework Directive.

There was considerable **support** for Policy WLWP3 and decentralised energy with 45% of respondents to the technical questionnaire in support and only 5% against. However, many supporters of the principle also had some caveats and concerns, as set out below.

- There were concerns about the impacts of concentrating waste and energy facilities in a particular area and any negative impact on communities. Also particular sites were also felt to be unsuitable for this approach;
- Technology such as anaerobic digestion and incineration should be located close to commercial areas and away from residential communities (400m cordon suggested);

- Waste development that would be able to generate significant energy would require specific site characteristics in terms of its specific character, scale and technology. No assessment of how the sites identified in the plan would perform in these terms has been presented. As a result, there is no clarity in respect of the effect on his policy or its implementation;
- Air quality issues may constrain some technologies e.g. biomass, incineration;
- Add a reference to the production of biogas/syngas for use in vehicles (i.e. waste collection fleet);
- Sites with the ability to co-locate facilities should be viewed positively in that they can maximize efficiencies of energy and fuel use;
- Four supporters of decentralised energy in principle didn't want this approach to create a preference for incineration;
- Need for local communities to be educated sufficiently about these provisions. Information must be provided in plain English and in a way that is directly relevant to the communities around these facilities. The benefits need to be made clear (e.g. cheaper energy?);
- Existing waste policies should be doing this now and investment proposed for new sites put into this area; and
- Any waste to energy facility should be CHP ready where appropriate. Biogas facilities such as AD should also be considered and the best environmental option used, whether this is providing energy for the grid or conversion of the fuel to a biogas for transport.

Respondents who **disagreed** with this policy highlighted the following issues:

- Concerns about energy from waste related to the technologies, emissions/pollution and climate change impact;
- The West London Waste Authority, whilst supporting the policy's preference for use of any refuse derived fuel to be used in combined heat and power facilities in London or as a direct replacement for fossil fuels in London in principle, suggested that this is an impractical suggestion in the short-term, and indeed, possibly for the first five to ten years of the WLWP. The Authority noted that this requirement is caveated by the phrase 'where reasonably practicable', but as reasonably practicable can be difficult to define it was suggested that the use of this fuel type in London is stated as preference rather than a requirement;
- Energy from Waste was felt by some to actively discourage greater recycling rates, as the quote below illustrates:

*'Incineration costs maybe £100-million and require long-term contracts that demonstrably stop local authorities reducing waste quantities offered, or improving recycling which reduce the calorific value of the incinerator fuel supplied. It is unacceptable for the WLWP to encourage market demand for new, new-style incinerators. It is acceptable to partly-process waste so that land-fill material is inert, and produces no gases. It is also acceptable to produce material that is structurally suitable for permanent landscaping, and never require maintenance. The WLWP must include the RISK that incinerators are rapidly becoming politically unacceptable, and that planning permission can be successfully opposed. The WLWP must not create any demand for them'.*

- Some felt that the Plan gave heavy emphasis on waste being used as a source of energy but little emphasis to its use as a resource (e.g. para 3.2.1 and table, with the low quantity allocated to MRFs and the high quantity allocated to various energy producing options). This was seen as being contrary to the Waste Hierarchy. An example given concerned plastics: the most combustible component of waste is its plastic content – the Plan should recognise that the heat of combustion is about a fifth of the energy that has been used to produce the plastic item, and that there is a substantial resource saving in recycling plastics over producing new product from virgin raw materials. Techniques for separating plastic waste into the separate polymers are improving substantially, and will continue to do so by 2026 - the Plan should recognise the existence of Plastic Reclamation Facilities (PRFs) and WRAP's work and should major on waste as a resource, and downplay its use as a source of energy. The Plan could include the definition Plastics Reclamation Facility (PRF) in the glossary: 'A plant capable of separating a mixed stream of plastic components into their separate polymers'.
- Decentralised energy is not a 'given' and land-fill is preferable to incineration, or 'energy from waste'. Land-fill must be reduced year on year, but by redesigning manufacturing, reuse and recycling, not by a techno-fix of incineration;

#### **Policy WLWP4: Sustainable Site Waste Management**

WLWP Policy 4 encourages sustainable waste management. The draft policy wording is shown in the box below.

**Table 13 WLWP Policy 4**

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

- 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 locally;
- Construction, demolition and excavation wastes are reused or recycled on site, where practicable.
- All waste management developments must produce construction phase Site Waste Management Plans.

One third of those who expressed an opinion considered that the 10% figure was too low – this included those that agreed in principle with the policy as well as those who disagreed (indeed this appeared in many cases to be the reason for most disagreement).

Comments expressed by those in **support** of the policy included:

- The minimum target of 10% reused/recycled material use during construction/operation is not ambitious enough. A minimum target of 25% is readily achievable;
- Demolition waste should not travel distances to central waste units. Disposal should be at existing units where possible;
- Scepticism that it will happen given that proposed sites don't have a waste facility attached to them.

Respondents who **disagreed** with this policy cited the following issues:

- The encouragement of the recycling of construction and demolition waste should be one of the criteria against which the acceptability of a particular proposal is judged, rather than the achievement of recycling conferring what appears to be a policy presumption in favour of it;
- 10% is a very low figure for reuse. Major construction projects such as the Olympics have achieved much higher figures than this. Need to increase the percentage;
- Sites with a Part A Environmental Permit do not need a Site Waste Management Plan (the requirements are in effect covered by the permit conditions);
- The plan over emphasises composting (in tonnages to go to such facilities and hence number of sites). Gasification / Pyrolysis results in renewable heat and electricity as well as sequestration of carbon in useful Biochar (used by Lichen Renewable in the manufactured soil layer above a low permeability cap on historic landfills). The Waste Hierarchy needs further thought;
- The policy does not set a high enough sustainability benchmark as it largely focuses on the development of the site and not its whole life for waste management. The operations of a site generally have much greater significance for sustainability/climate change than those relating to site development/construction.



## 4.3 Monitoring

18% of respondents agreed with the performance indicators and 16% disagreed. The majority – 66% - either didn't answer or said they didn't know. The issue of monitoring was clearly less important or relevant to people than the sites or policies.

The main issues for those disagreeing with the KPIs were:

- The effect on local communities (smell, noise, pollution, vermin etc) should be a key indicator (4 responses);
- The quantity and composition of waste being sent to the Colnbrook incinerator should be included as an indicator (2 responses);
- Indicators should be included on: climate change mitigation e.g. linked to renewable energy production (1 suggestion); and waste transportation by road and rail (1 suggestion).

Other key points from those in favour of the KPIs included:

- One respondent suggested that these indicators should look beyond total tonnage capacity given planning permission, and consider actual tonnage treated as a more accurate indicator of success. The WLWA offered to share information for three of the proposed performance indicators; the quantity of municipal waste generated by household; reuse, recycling and composting figures of municipal waste; the quantity of municipal waste landfilled, it is difficult to understand how these performance indicators measure accurately the quantity of waste that is managed within the Authority area.
- Supporters of the KPIs also suggested possible new indicators on: the engagement with owner/occupiers of proposed new sites and their willingness to become involved in the delivery of the aims of the WLWP; and 'whether provision is necessary'.

# Appendix A Questionnaires

## Short Questionnaire

<p><b>1. Do you agree with the preferred approach of meeting the London Plans waste predictions plus providing a level of flexibility in the event some sites are not found to be suitable?</b></p> <p>Yes...</p> <p>No...</p> <p>Please provide reason(s): _____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p><b>2. Please provide your views on the existing and new sites identified within the document?</b></p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p><b>3. Do you agree with the 4 policies outlined in the document?</b></p> <p>Yes...</p>

No...

Please provide reason(s): \_\_\_\_\_

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**4. Do you have any other particular issues you like to raise regarding the document?**

Yes...

No...

If so, please provide reason(s) and suggestions for improvement: \_\_\_\_\_

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# Technical Questionnaire

## 1. General approach of the West London Waste Plan (WLWP)

The general approach of the WLWP is to identify sites with the potential for developing waste management facilities in order to meet West London’s share of waste requirements (apportionment) and providing a level of flexibility (i.e. some over-provision should sites not come forward).

*Do you agree with this general approach?*

*Yes...*

*No...*

*Please provide reason(s):* \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
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*Is there anything else to include in the general approach?* \_\_\_\_\_  
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\_\_\_\_\_  
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## 2. Preferred approach of the WLWP

There are three elements to the preferred approach of the WLWP, as follows:

- 1) To identify the general land boundaries of potential waste sites, rather than also to identify the specific technology(s) and/or facility(s)

associated with the site;

- 2) To identify potential waste sites of different sizes to allow for both large and small scale waste management facilities; and
- 3) To support on-site recycling and reuse of construction / demolition / excavation waste takes place on waste sites, and to ensure that the quantities of waste arisings will be recorded.

*Do you agree with the preferred approach?*

*Yes, I agree with all three elements of the preferred approach...*

*No, I disagree with one or more element(s) of the preferred approach...*

*Please provide reason(s):* \_\_\_\_\_  
\_\_\_\_\_  
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*Are there any other elements that should be included within the WLWP as part of the preferred approach?* \_\_\_\_\_  
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\_\_\_\_\_

**3. WLWP Policy 1**

WLWP Policy 1 outlines the strategic approach that existing and new sites identified as potential waste development will generally be supported, provided that the proposals comply with other policies in the WLWP and the borough's Local Development Framework. The policy also emphasises that other sites, not identified within the WLWP, may still be permitted, where it has been demonstrated there are emerging shortfalls in waste management capacity.

*Do you agree with WLWP Policy 1?*

*Yes...*

*No...*

*Please provide reason(s):* \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

*Do you have any further comments and suggestions to make about WLWP Policy 1?* \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

#### **4. WLWP Policy 2**

WLWP Policy 2 aims to ensure high quality development during both its construction and operational phases. This Policy sets out development criteria for new waste management facilities to minimise adverse impacts on the environment and local residents.

*Do you agree with WLWP Policy 2?*

*Yes...*

*No...*

*Please provide reason(s):* \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

*Do you have any further comments and suggestions to make about WLWP Policy 2?* \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
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**5. WLWP Policy 3**

WLWP Policy 3 encourages all waste facilities capable of producing energy, where practicable and compliant, to contribute to the provision of decentralised energy (i.e. generating local supplies of low carbon energy) in the form of heat and/or power facilities.

*Do you agree with WLWP Policy 3?*

Yes...

No ...

*Please provide reason(s):* \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
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*Do you have any further comments and suggestions to make about WLWP Policy 3?* \_\_\_\_\_

\_\_\_\_\_  
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**6. WLWP Policy 4**

WLWP Policy 4 encourages sustainable waste management, permitting waste

management facilities where it can be demonstrated that: at least 10% of the materials or products used during construction and operation phases are reused or sourced locally and recycled; construction / demolition / excavation wastes are reused and recycled; and construction phase Site Waste Management Plans are provided.

*Do you agree with WLWP Policy 4?*

Yes...

No...

*Please provide reason(s):* \_\_\_\_\_

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*Do you have any further comments and suggestions to make about WLWP Policy 4?* \_\_\_\_\_

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### **7. Suitability of existing waste sites for re-development for continued waste management**

Eleven existing waste sites have been identified within the *Proposed Sites and Policies* consultation document as being suitable for re-development listed in Table 4-1 (Pg 16).



a) Do you agree that all of the existing waste sites identified are suitable for re-development?

Yes, all of the sites are suitable...

No, one or more of the sites is unsuitable...

Please provide reason(s): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

b) Do you agree with the justifications associated with the inclusion of existing waste sites that are below the minimum site assessment criteria score?

Yes, all of the justifications are acceptable...

No, one or more of the justifications are unacceptable...

Please provide reason(s): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**8. Suitability of new sites for developing as waste management facilities**

Thirteen new sites have been identified suitable for being developed as waste management facilities listed in Table 4-2 (Page 21).

a) Do you agree that all of the new waste sites identified are suitable for

waste management facilities?

*Yes, all of the new sites are suitable.....*

*No, one or more of the sites is unsuitable.....*

*Please provide reason(s):* \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
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*b) Do you agree with the justifications associated with the exclusion of potential new sites that are above the minimum site assessment criteria score?*

*Yes, all of the justifications are acceptable...*

*No, one or more of the justifications are unacceptable...*

*Please provide reason(s):* \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

*c) Are there any other sites not already identified that you think would be suitable for waste management facilities?*

*Yes, there are one or more other sites suitable (please provide a site map and/or address if possible)...*

*No...*

*Please provide reason(s) why you think a particular site is suitable:* \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
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**9. Monitoring the Plan**

To determine whether the allocation of sites is sufficient and whether the WLWP may need to be modified in the future, key performance indicators are to be reported each year in an Annual Monitoring Report (Page 33).

*Do you agree with the key performance indicators?*

*Yes ...*

*No, one or more of the key performance indicators are unsuitable...*

*Please provide reason(s):* \_\_\_\_\_

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**10. Do you have any further comments?** \_\_\_\_\_

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# Appendix B: additional information on objections

## Park Royal sites

In addition the main objections discussed in section 3.2, the following specific reasons were given for objecting to particular Park Royal sites.

**Table 14 Other reasons for objecting to specific Park Royal sites**

Objector	Reason for objection	Relating to sites												
		Existing					Proposed new							
		352	328	386	129	186	187	183	182	191				
Ashia Centur Ltd and Century City	Negative impacts on neighbouring regeneration development			√										
Bestway Cash and Carry	Adverse impact on access to Bestway site	√												
Bestway Cash and Carry	Impact on Bestway staff and customers				√									
Bestway Cash and Carry	Adverse impact on access to Bestway site, and adverse visual impact					√								
Bestway Cash and Carry	Concern about adverse access impacts										√			
GLA	May be access and parking issues				√									
GLA	Inclusion of site may compromise long term ambition to provide bus operations													√
Local	Loss of business premises and employment,					√								

Objector	Reason for objection	Relating to sites										
		Existing		Proposed new								
		352	328	386	129	186	187	183	182	191		
business	closeness to ASDA											
Local resident	Impact on new student accommodation being built by North Acton Station, and on hotels near station							√	√			
Local resident	Impacts on leisure use of the canal				√						√	
Local resident	Would prevent development at adjacent Nash House										√	
Local resident	Impact on water environment	√										
Local resident and English Heritage	Potential impacts on Conservation areas. Site appears to be adjacent (rather than 500m) from the Canalside Conservation Area and Old Oak Lane Conservation Area (English Heritage)										√	
Local residents	Impact on Central Middlesex hospital					√	√	√	√			
Local residents	New development sites are already planned which will increase traffic					√	√					
Local residents	Impact on school and proposed crèche					√	√					
National Grid	Proximity to national grid transmission cables		√			√					√	
SEGRO Plc	Impact on existing industrial estate	√				√	√	√	√			
Tarmac	Impact on existing Tarmac concrete batching plant which forms a small part of proposed new site					√						
Vale Europe Ltd	Access issues and impact on neighbouring uses											

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## West London Waste Plan

### **DRAFT Proposed Submission Version**

11th November 2011

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## 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 incineration or to landfill – not enough is being recycled and re-used.
2. Consequently, the Government now requires every local authority to produce a plan which details 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 Development Framework and show which factors they will take into account when deciding on whether to grant planning permissions for new waste facilities.
3. In London, the Mayor has set out in the London Plan (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 is then allocated an apportionment of that waste that it is required to actively plan for managing and has to ensure that sufficient sites are identified to meet the apportionment targets. By meeting the apportionment London will dramatically improve its reliance on landfill and move towards being self-sufficient.
4. In west London, six London boroughs have agreed to co-operate to produce a single waste plan for their combined area. When finalised, this plan will form part of each of their respective Local Development Frameworks. The West London Waste Plan details the amount for the different types of waste expected to be produced in west London up to 2026; identifies the current sites available to help deal with that waste; identifies the current shortfall of facilities needed, and proposes a set of further sites which might be used for waste facilities in the future.
5. The West London Waste Plan has been prepared with the objective of ensuring compliance with the waste apportioned to the six boroughs as detailed in the London Plan (2011).
6. The report comprises six sections, covering:
  - i. An introduction to the West London Waste Plan;
  - ii. The Vision and Objectives of the Plan;
  - iii. An explanation of what will be needed in the future to manage waste;
  - iv. Details of the Proposed Sites for future waste management use;
  - v. Policies to guide the determination of planning applications for new waste facilities, and
  - vi. A short explanation of how the Plan will be monitored in future.

7. The existing sites and proposed sites are:

Table i: The proposed sites allocated for redevelopment

Site Number	Site Area (ha)	Borough	Description	Site Type
352	1.46	Brent	Twyford Waste Transfer Station	Existing
1261	2.71	Brent	Veolia Transfer Station, Marsh Road	Existing
309	1.15	Ealing	Greenford Reuse & Recycling Site,	Existing
310	0.94	Ealing	Greenford Depot, Greenford Road,	Existing
328	2.10	Ealing	Quattro, Victoria Road, Park Royal	Existing
303	4.25	Hillingdon	Victoria Road Transfer Station	Existing
353	3.11	Hounslow	Transport Avenue Waste Transfer Station	Existing
342	3.67	Richmond	Twickenham Depot	Existing
222	2.83	Harrow	Council depot, Forward Drive	Proposed
244	3.12	Hillingdon	Yeading Brook, Bulls Bridge	Proposed
2861	3.20	Hounslow	Western International Market	Proposed

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# 1 The West London Waste Plan

## 1.1 Preparation of the Plan

- 1.1.1 The West London Waste Plan is being 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.

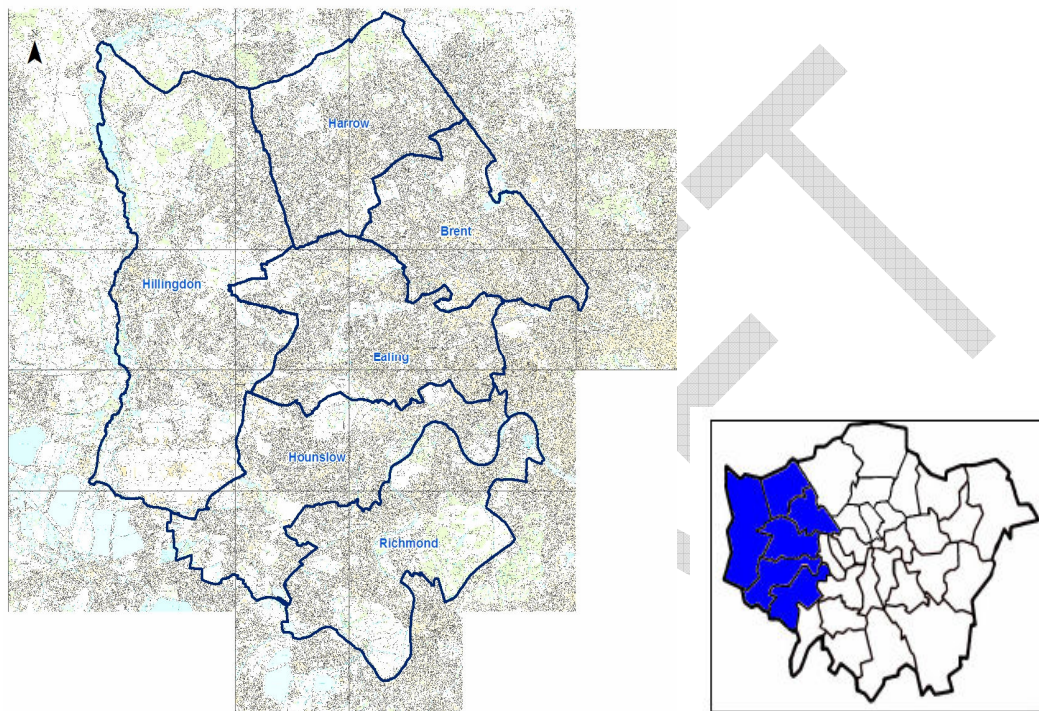


Figure 1-1: West London boroughs

## 1.2 Why Is The West London Waste Plan Needed?

- 1.2.1 The West London Waste Plan (the Plan) will provide a planning framework for the management of all waste produced in the six boroughs over the next 15 years. It is needed to comply with the Mayor's London Plan (2011), which sets out targets for recycling and composting for waste from households, businesses and industry. The London Plan (2011) also requires that the majority of waste generated in London is managed in London, so that the Capital moves towards waste self-sufficiency by 2031.
- 1.2.2 Currently, a significant amount of waste is transferred outside of London for treatment or disposal in landfill. Table 1-1 shows the London Plan (2011) targets for the proportion of waste to be managed within London for various target years. Overall, the target states that the aim is to manage the equivalent of 100 per cent of London's waste within London by 2031.

Table 1-1: Self-Sufficiency targets for London

Waste stream	2015	2020	2031
Municipal Solid Waste	45%	50%	60%
Commercial & Industrial Waste		70%	
Construction, Demolition & Excavation		95%	
All wastes			100%

- 1.2.3 Under the Planning and Compulsory Purchase Act 2004, London boroughs are required to replace their existing Land Use Plans (called Unitary Development Plans) with Local Development Frameworks. Local Development Frameworks comprise a number of planning documents and must contain both specific policies for waste and sites identified for waste use. These planning documents must be in general conformity with the London Plan; the Mayor of London's planning strategy for the capital, in addition to national planning policy. Before the Plan can be adopted it will be independently tested through a public examination to ensure it meets all of the key tests for a sound plan.
- 1.2.4 The Plan will outline the proposed sites for waste management development in the plan area and provide a set of policies with which waste developments must conform. The Plan will cover the London Plan (2011) apportionment targets outlining the amount of waste from households, business and industry required to be managed in the west London area up to 2026. 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	Draft Plan Consultation
January - February 2012	Representations on Proposed Submission Version
January 2013	Examination of the Plan
May 2013	Adoption of the Plan 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 national, regional and local policy in relation to waste development (both adopted and emerging).
- 1.3.2 This Plan will be adopted, after Examination in Public and consideration of the appointed Inspector's report, by each of the constituent boroughs. It will take on the status of a statutory Development Plan Document, and its policies will be accorded considerable weight by each local planning authority and the Secretary of State in determining planning applications for waste management facilities within the plan area.

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## European Legislation

- 1.3.3 The Waste Framework Directive [2008/98/EC, which has been implemented by the Waste England and Wales Regulation 2011,]<sup>1</sup> is the principal EU legislation for waste, and requires that measures be put in place to ensure that waste is recovered or disposed of without endangering human health or causing harm to the environment. A key principle of the directive is the waste hierarchy, with the objective to manage waste as near to the top of the hierarchy as possible.

## National Policy

- 1.3.4 National policy relevant to waste development is outlined in the UK Sustainable Development Strategy<sup>2</sup> which sets out the national policy approach to ensuring sustainable development. The Waste Strategy for England 2007<sup>3</sup> was published following a comprehensive review of Waste Strategy 2000. The key objectives of these documents are to:

- Decouple waste growth from economic growth and put more emphasis on waste prevention and re-use;
- Increase diversion of municipal and non-municipal waste from landfill;
- Secure investment in waste infrastructure; and
- Get the most environmental benefit from the investment through increased recycling of resources and recovery of energy from residual waste.

The Waste Strategy for England (2007) also sets national targets for recycling and composting of household waste and the recovery of municipal waste.

- 1.3.5 Planning Policy Statement 10: Planning for Waste Development<sup>4</sup> outlines the key objectives and considerations when producing planning policies for waste development and the consideration of relevant applications for development.

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<sup>1</sup> Waste Framework Directive (Directive 2008/98/EC - <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32008L0098:EN:NOT>)

<sup>2</sup> The UK Government Sustainable Development Strategy - <http://www.defra.gov.uk/publications/files/pb10589-securing-the-future-050307.pdf>

<sup>3</sup> Waste Strategy for England 2007 - <http://archive.defra.gov.uk/environment/waste/strategy/strategy07/documents/waste07-strategy.pdf>

<sup>4</sup> Planning Policy Statement 10 - <http://www.communities.gov.uk/documents/planningandbuilding/pdf/1876202.pdf>

## Regional Policy

- 1.3.6 The London Plan (2011) 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 strategies for other parts of England will be abolished, the London Plan will continue to provide strategic guidance within the capital and thus be accorded significant weight in guiding the evolution of development plans and in determining planning applications.
- 1.3.7 Boroughs must be in general conformity with the relevant waste management policies in the London Plan (2011). 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.
- 1.3.8 Each of the six west London boroughs is preparing a number of other strategies and plans which, along with the Plan, will form its Local Development Framework (LDF).
- 1.3.9 Each borough must produce Development Plan Documents (DPDs) which make up their LDF. The main DPD is the Core Strategy which sets out the general spatial vision and objectives for delivery of the LDF. It also helps the borough to deliver its Community Strategy and must reflect the regional strategy, which is set out in the London Plan.
- 1.3.10 The Plan is a DPD (see 1.3.2) and, although being prepared jointly by the six west London boroughs, must be aligned with their individual Core Strategies and adopted development plans.

## 1.4 Sustainability Appraisal

- 1.4.1 The Plan has been subjected to a Sustainability Appraisal (SA) during the course of its development. An SA ensures that planning documents accord with the principles defined in the Government's UK Sustainable Development agenda<sup>5</sup>. The timing of the SA aims to ensure that sustainability considerations are taken into account early in the process of policy development. A Habitats Regulations Assessment (HRA); an Equalities Impact Assessment (EqIA); and a Strategic Flood Risk Assessment (SFRA) have also been undertaken in conjunction with the development of this Plan. Appendix 1 provides details on the process for each of these assessments.

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<sup>5</sup> Defra Sustainable Development Unit - <http://www.sustainable-development.gov.uk/publications/uk-strategy/framework-for-sd.htm>

## **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".
- 1.5.2 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 report<sup>6</sup>. A wide range of responses was received via the various public workshops and meetings held across the six boroughs, via the project website and in writing. 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 report. Staffed drop-in sessions in each of the six boroughs were attended by over 120 people along 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 alongside two petitions containing 2,399 signatures. A full report on this consultation is available on the West London Waste Plan website ([www.wlwp.net](http://www.wlwp.net)).

## **1.6 Commenting on the Plan**

- 1.6.1 You can make representations on this proposed submission draft of the West London Waste Plan, including the Sustainability Appraisal and Equalities Impact Assessment during a six week period commencing from the 19 January 2012.
- 1.6.2 All representations made will be considered by a Planning Inspector at a formal process called an examination in public. The purpose of the examination is to consider whether the Waste Plan complies with the legal requirements and is 'sound'.
- 1.6.3 Since the Planning Inspector's role is to answer these questions, any comments on the Plan will need to be related to legal compliance and "soundness".

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<sup>6</sup> *West London Waste Plan Issues and Options Report (February 2009) available to download from <http://www.wlwp.net/documents.html>*

1.6.4 In summary, comments on the “soundness” of the Plan need to address the following issues:

- Is it ‘justified’? This means that the document must be:
  - founded on a robust and credible evidence base
  - the most appropriate strategy when considered against the reasonable alternatives
- Is it ‘effective’? This means that the document must be:
  - deliverable
  - Flexible, so that the local authorities can adapt the plan to respond to unexpected changes in circumstances
  - able to be monitored against clear, and measurable criteria
- Is it consistent with national policy?

1.6.5 More guidance on the meaning of these terms will be included with the comments form. Other guidance is available from the Planning Inspectorate<sup>7</sup> and in Planning Policy Statement 12 which outlines the requirements for Core Strategies<sup>8</sup>.

1.6.6 All responses must be received by 1 March 2012. All representations and other material in support of any comments made should be sent to:

**CAG Consultants**  
**West London Waste Plan Consultation**  
**Gordon House, 6 Lissenden Gardens, London, NW5 1LX**  
**Email: [consultation@wlwp.net](mailto:consultation@wlwp.net)**

1.6.7 Comments can also be given via the website:

**[www.wlwp.net](http://www.wlwp.net)**

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<sup>7</sup> See: [http://www.planningportal.gov.uk/uploads/pins/dpd\\_brief\\_guide\\_examining.pdf](http://www.planningportal.gov.uk/uploads/pins/dpd_brief_guide_examining.pdf)

<sup>8</sup> The Waste Plan is a joint Core Strategy for waste. PPS12 outlines the requirements for Core Strategies in section 4:  
<http://www.communities.gov.uk/publications/planningandbuilding/pps12/sp>

1.6.8 The West London Waste Plan Proposed Submission document and an accompanying Technical Report, Sustainability Appraisal and Equalities Impact Assessment are available for download via the West London Waste Plan website at: [www.wlwp.net](http://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 The west London authorities 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. This may include spoken or written translation in different languages, Braille, audio or large print format.

1.6.10 The representations made on the West London Waste Plan will be forwarded to the Planning Inspector.

1.6.11 There will be an independent Examination in Public of the West London Waste Plan which will start upon its submission to the Secretary of State in September 2012 and culminate in a hearing before an independent Planning Inspector in January 2013. Following the Examination, the Inspector will issue a binding report. Following ratification of the Inspector's report by each borough, the West London Waste Plan will be formally adopted by each borough in May 2013.

## **1.7 Planning applications for waste management facilities**

1.7.1 The Plan and its policies will be the primary material consideration when assessing planning applications for new waste management facilities in the west London boroughs. After this Plan has been adopted, developers should first use the West London Waste Plan to identify a suitable site when considering the development of a potential new waste management facility. If the developer cannot find a suitable site in the Plan, any alternative site proposed will have to conform to the policies within the Plan. Developers should also consider requirements and policies within the following documents before submitting a planning application for a waste management facility in west London:

- Any national statutory guidance, e.g. Planning Policy Statement 10;
- Borough Development Plan Documents;
- London Plan;
- Mayor of London Order (2008); and
- Supplementary Planning Guidance from the Mayor or Supplementary Planning Documents from the relevant borough.

## **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 waste collected by the boroughs.
- 1.8.2 The WLWA and its constituent boroughs consulted on and subsequently adopted a Joint Municipal Waste Management Strategy<sup>9</sup> in 2005. It sets out the future waste and recycling plans and targets for the Authority and each of the six boroughs. An Addendum followed in 2009, providing an update on the Authority's Partnership waste management performance.
- 1.8.3 The WLWA has a vision of achieving a 70% reuse/recycling/recovery rate and zero waste to landfill although there is no timescale for these targets.
- 1.8.4 In 2008/09 the WLWA and its constituent boroughs dealt with a total of 767,000 tonnes of municipal waste, including abandoned vehicles. Of this total some 176,000 tonnes was recycled, 84,000 tonnes was composted, and the remaining 507,000 tonnes was sent for disposal, nearly all by rail from the WLWA's transfer stations in Brentford and South Ruislip, to landfill sites in Oxfordshire and Buckinghamshire.
- 1.8.5 From 2009/10 increasing quantities of waste not recycled or composted will be diverted from landfill. The WLWA has a contract to send waste to the Lakeside Energy from Waste plant near Slough, for the next 25 years. This contract started in 2009/10 with an annual tonnage of 25,000 tonnes. It remains at this level 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 2034/35.

## **1.9 Cross boundary movement of waste**

- 1.9.1 Whilst waste is both generated and treated within west London boroughs, there is still the transfer of waste both into the WLWA area as well as exported out of it for treatment in other areas. It is important to assess the level of this cross boundary movement of waste and to identify potential implications this may cause to the West London Waste Plan during the Plan period.
- 1.9.2 The WLWA and its constituent boroughs exported 995,900 tonnes of waste out of west London for landfill disposal in 2008. The majority of this waste was sent to Buckinghamshire (28%) and Bedfordshire (24%), followed by Oxfordshire (12%), with the remaining 36% divided between eight other authorities.

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<sup>9</sup> WLWA Draft Joint Municipal Waste Management Strategy, September 2005 - <http://www.westlondonwaste.gov.uk/west-london-waste-authority/strategy/>

1.9.3 The relevant authorities to whom this waste was exported have adopted waste plans which have identified sufficient sites to accommodate the declining levels of waste that will be exported from London for the period of this Plan, which is until 2026.

1.9.4 As such, it is considered with the implementation of the policies in this Plan which are designed to help achieve the London Plan (2011) aim of 100% of waste produced in London being managed in London by 2031, and the move towards providing energy production from waste sites, that there will be no overriding issues with regards to the impact of any cross boundary movement of waste.

**1.10 Waste Minimisation**

1.10.1 The west London boroughs are committed to waste reduction and minimisation initiatives and understand the importance of such issues to the residents of west London and to the success of sustainable waste management in the area. Although the Plan cannot directly enforce waste reduction, it will encourage waste minimisation through appropriate policies.

1.10.2 The West London Waste Plan supports the management of waste according to the waste hierarchy (Figure 1-2) as identified in the Waste Strategy for England<sup>10</sup> and the London Plan (2011).

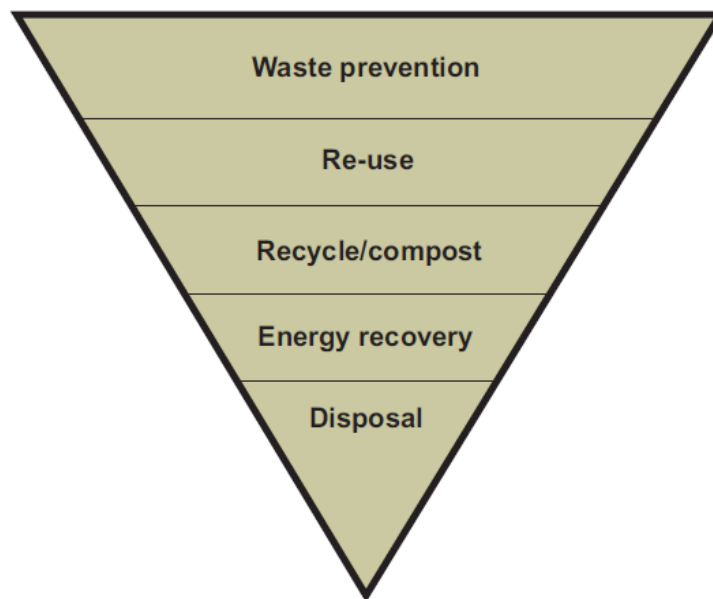


Figure 1-2: The Waste Hierarchy

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<sup>10</sup> Waste Strategy for England (2007), Department for Environment, Food and Rural Affairs (DEFRA) [www.defra.gov.uk](http://www.defra.gov.uk)



Each of the six boroughs is already dealing with wider waste issues such as encouraging waste minimisation and increasing recycling in accordance with the waste hierarchy. The waste hierarchy states that we should first try to reduce and re-use waste, then recycle waste into useful materials and, if this is not possible, recover energy from waste before considering the safe disposal of waste as a last resort. All boroughs operate household waste recycling collections, reuse and recycling centres and offer information on waste minimisation activities such as home composting or using re-usable nappies.

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## 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 ensures that the long-term management of waste in west London will allow for the best possible outcomes for the west London boroughs. It brings together 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**

By 2026, the West London Waste Plan area will have made provision for enough waste management facilities in the right locations to provide for the sustainable management of waste. It will seek to do so 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 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, including safeguarding existing waste sites and maximising their use as waste management sites.
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 and future waste management needs

### 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 infrastructure is required to meet the London Plan (2011) waste apportionment figures.

### 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 and recycling centres.

3.2.2 Overall in 2009/10 the WLWA and its constituent boroughs managed approximately 693,000 tonnes of MSW. Of this total, 41% was reused, recycled or composted, with the remaining 59% sent for disposal, nearly all to landfill outside west London. This figure for landfill compares favourably with previous years (Table 3-1), both in terms of the total tonnage sent to landfill and the percentage of the total MSW stream this represents. Figure 3 shows the means of waste management in the plan area in 2009/10, the latest full year for which figures are available.

Table 3-1: WLWA management of MSW (2006-2010)

Waste (tonnes)	2006/07	%	2007/08	%	2008/09	%	2009/10	%
Recycling & Reuse	116,000	14.6	131,000	16.9	139,000	19.0	155,000	22.4
Composting	62,000	7.8	71,000	9.2	84,000	11.5	86,000	12.4
Energy Recovery	3,000	0.4	3,000	0.4	1,000	0.1	12,000	1.7
Landfill	603,000	75.8	555,000	71.8	485,000	66.2	395,000	57.0
Materials Recovery Facility	13,000	1.6	13,000	1.7	25,000	3.4	45,000	6.5
Total waste	796,000		773,000		733,000		693,000	

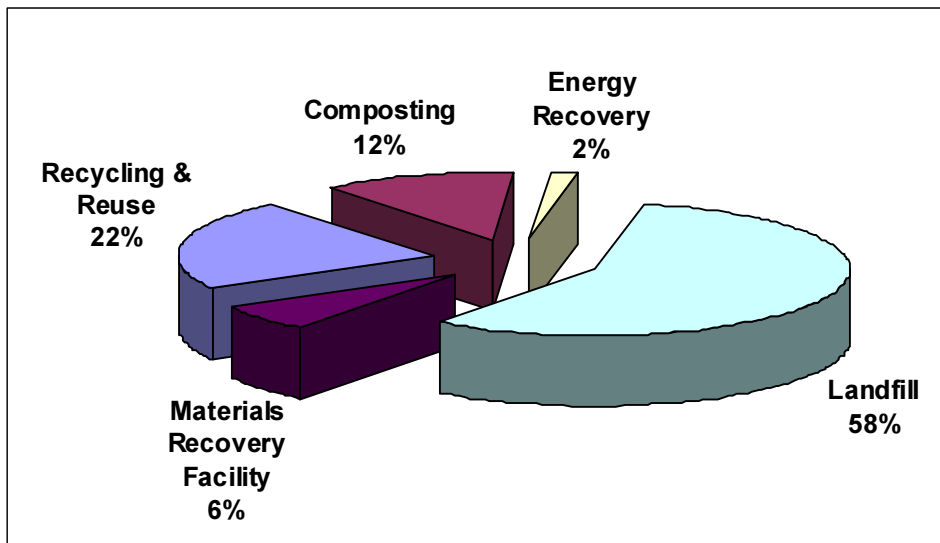


Figure 3-1 - West London Waste Authority MSW management (2009/10)

3.2.3 As the statutory body responsible for managing MSW generated in the west London boroughs, the WLWA is in the process of procuring a new long term contract for the management of this waste. The main objective of the procurement is to eliminate (or significantly reduce) the landfilling of municipal waste. The WLWA has been working in partnership with its constituent boroughs and has produced a Procurement Strategy<sup>11</sup>. The procurement is outcome-based, with targets for landfill diversion, affordability, recycling and carbon impact and has no preference on the technology to be used.

3.2.4 The WLWA, following consultation with the GLA, issued an Official Journal of the European Union (OJEU) notice on 16th May 2011 to commence the procurement process of the treatment of up to 300,000 tonnes of municipal waste per year.

### 3.3 Commercial and Industrial Waste

3.3.1 Historically, Commercial and Industrial Waste (C&I waste) was categorised as a distinct type of waste in the UK. However with the implementation of the European Waste Catalogue<sup>12</sup> (EWC) as a method of coding waste, much of this waste is increasingly being categorised as 'Municipal Wastes'.

<sup>11</sup> WLWA Procurement Strategy - <http://www.westlondonwaste.gov.uk/west-london-waste-authority/procurement/>

<sup>12</sup> European Waste Catalogue - <http://www.environment-agency.gov.uk/static/documents/GEHO1105BJVS-e-e.pdf>

3.3.2 The DEFRA Survey of C&I waste arisings for 2009 estimated west London produced 845,000 tonnes of C&I waste during that year, which is a reduction of 621,000 tonnes (42%) from the previous C&I Survey in 2002/03, which estimated that 1,466,000 tonnes of C&I waste was produced. Conversely, the London Plan 2011 has estimated that west London produced 1,299,000 tonnes. For purposes of consistency, this Technical Report will use the more conservative London Plan (2011) C&I waste data estimate, as this was used as part of the basis for the apportionment figures determined for west London boroughs and offers flexibility over the DEFRA 2009 estimate.

3.3.3 Figure 3-2 displays the generation of C&I waste by sector in west London, with the largest source of waste arising in the retail and wholesale sector (approximately one third). The largest components of the C&I waste stream in west London are mixed waste (41%) followed by non-metallic waste (30%) and the remainder including mostly chemical or animal and vegetable wastes.

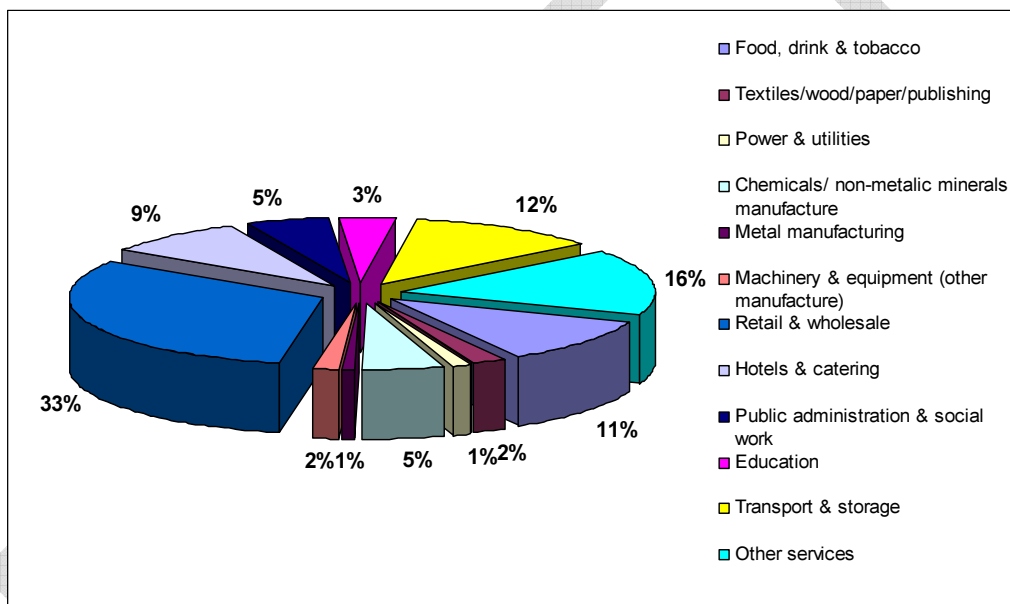


Figure 3-2 - C&I waste generation in west London by sector

### 3.4 Construction, Demolition and Excavation Waste

3.4.1 Construction, Demolition and Excavation waste (CD&E) waste makes up almost half of London's total waste, and this is also reflected in west London, where 47% of the total waste arising in the boroughs is CD&E waste.

Analysis of the most recent Environment Agency data (2009) for CD&E waste indicates that an estimated 754,000 tonnes was generated in west London, while 837,000 tonnes was transported into the area, resulting in a net importation of about 83,000 tonnes of CD&E waste. The principal fate of CD&E waste exported from west London is reprocessing (66%), with a further 30% landfilled, and the remaining

amount either treated or with an unknown fate. In comparison, 99% of CD&E waste imported into west London is transferred for treatment or disposal elsewhere, with the remainder managed through recycling, treatment or landfill within the area.

### 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 fluorescent tubes. In 2009, west London exported approximately 73,000 tonnes. Compared with other waste streams generated in west London, hazardous waste is not a large waste stream, but is a sensitive one which requires a range of specialist facilities for treatment and disposal.

3.5.2 In 2009, west London boroughs exported hazardous waste to 48 different destinations across England, with the main destinations including Northamptonshire, the Western Riverside Waste Authority, Berkshire; and Surrey. The fate of this hazardous waste generated in west London is presented in Figure 3-3.

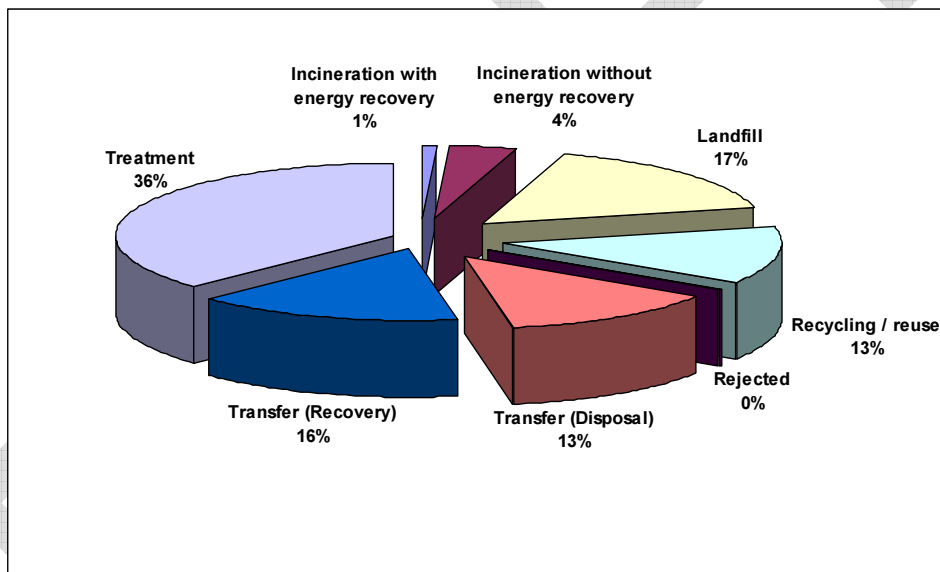


Figure 3-3 - Fate of hazardous waste arisings from west London (2009)

### 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 drained to Mogden STW in Isleworth, Beckton STW in East London, or Hogsmill STW in Kingston upon Thames. During 2010, these facilities generated over 100,000 tonnes of sewage sludge (dry solids) with all of this sludge being beneficially reused through either incineration with energy recovery, recycled to agricultural land or used for land restoration.

### **3.7 Healthcare Waste**

3.7.1 Healthcare waste covers a wide range of hazardous and non-hazardous waste including from hospitals, nursing homes, health centres, GP, dental or veterinary surgeries etc. West London's healthcare waste is either managed by the boroughs (Ealing, Hounslow and Richmond upon Thames) or their Primary Care Trusts (PCT) where the collection, transfer and disposal is taken care of by local waste contractors (Harrow). Brent and Hillingdon have a combination of the two, in which they only undertake the management of household collections with contractors managing the remainder. Healthcare waste accounts for approximately 822 tonnes per year of waste arising in west London. However, Hillingdon hospital also has an incinerator used for clinical waste disposal and it is estimated that this facility received approximately 7,600 tonnes of clinical waste for disposal in 2009.

### **3.8 Agricultural Waste**

3.8.1 The total amount of agricultural waste arisings in west London in 2009 was approximately 6,900 tonnes. The majority of this waste (94%) was sent to a Civil Amenity site located in Harrow, with a further 5% composted in Hillingdon and the remaining 41 tonnes sent to a waste transfer facility in Brent.

### **3.9 Radioactive Waste**

3.9.1 Limited information is available regarding the generation of radioactive waste in west London, with no records held by either the Environment Agency or the Department of Energy and Climate Change. It is assumed that, as west London does not accommodate any nuclear power generation facilities, radioactive waste arisings in the area are low. The only identified sources that may generate small amounts of low level radioactive waste (LLW) and very low level radioactive Waste (VLLW) are hospitals and universities in the boroughs. 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, or low volume VLLW that can be disposed of with MSW and C&I wastes at landfill site.

### **3.10 Role of Landfill in the Disposal of Waste**

3.10.1 Landfill disposal accounted for approximately 1,056,000 tonnes of west London's waste in 2009, with over 94% of that exported to landfill facilities outside of west London. The remaining 60,080 tonnes was sent to Harmondsworth Landfill located in southwest Hillingdon. Figure 3-4 illustrates the majority of this was sent to both Buckinghamshire (28%) and Bedfordshire (24%), followed by Oxfordshire (12%) and the remaining 36% was divided between eight other authorities.

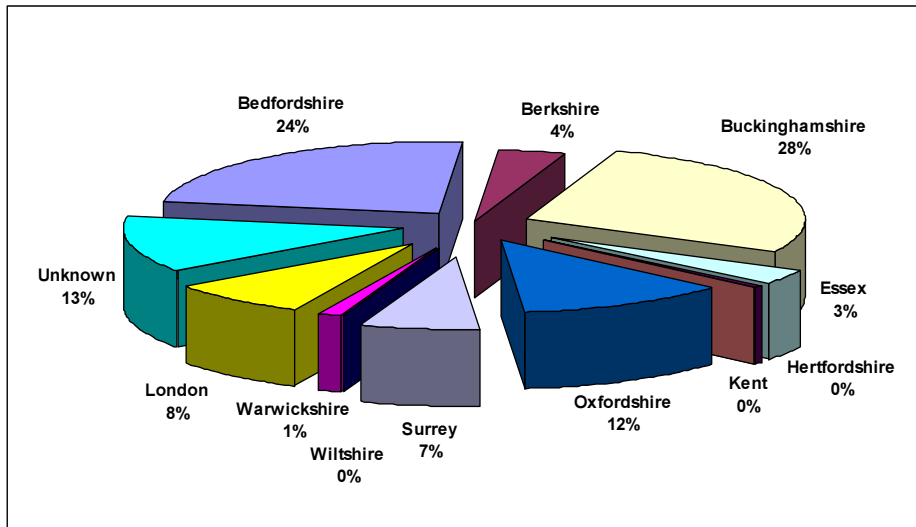


Figure 3-4 - Destinations where west London sends residual waste for landfill disposal (2009)

3.10.2 There are several different types of landfill, all of which play a different role in helping to manage west London's waste. Generally these are categorised by the types of waste they can accept for disposal.

3.10.3 Non-hazardous landfill usually accounts for residual MSW and C&I waste, whereas Inert Landfill usually accounts for CD&E waste. Hazardous waste landfills are highly specialised and only accept certain hazardous waste, while stable, non-reactive hazardous waste (SNRHW) landfill can be placed in a cell (specifically designed in a landfill to accept SNRHW (e.g. asbestos)) isolated from biodegradable waste.

In order to ensure that for the life of the WLWP there continues to remain capacity in areas surrounding London for the landfill of residual waste, further information was sourced. Published waste planning documents for the counties and regions concerned were consulted and followed up with discussions with local waste officers to cross-reference and confirm the information where possible.

Regional Spatial Strategies for London, the South East and East of England all refer to the requirement for the on-going (but declining) landfilling of residual waste from London in surrounding areas and provide directions on the apportionment for each of the waste planning authorities in their region. Subsequently, the counties that currently landfill residual waste from west London in significant quantities (as per Figure 3-4) will continue to be able provide capacity to receive waste for disposal at landfill from west London during the life of the WLWP, albeit in declining amounts.



## 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 to become the equivalent of 100% self-sufficient in the management of waste by 2031. To 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 potential sites for the development of waste management facilities. The west London boroughs have pooled their apportionments and will meet the collective apportionment figures.

4.1.2 Waste arisings projections are also included in the London Plan (2011), with these figures considered the most up-to-date for west London 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.

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

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

### 4.2 How much land is needed?

4.2.1 The London Plan (2011) is the statutory regional strategy of London. In order to comply with central Government requirements and be considered a "sound" planning document, the West London Waste Plan is being 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) as long as the total apportionment figure is addressed.

4.2.2 Currently, west London has few waste management sites but it has many waste transfer sites which bulk waste for disposal elsewhere. The intention of the Plan is to maximise the use of the existing waste sites in the area, including re-orientation of some waste transfer sites to new waste management facilities, as well as the

identification of new sites in west London for waste management uses.

- 4.2.3 The current existing waste management capacity in west London is 811,541 tonnes per annum including both waste treatment sites and the recycling undertaken at household waste and recycling centres and civic amenity sites. Subsequently, west London will need to develop extra waste management facilities during the period to 2026 to address 'gap' between the apportionment figures and the waste management capacity that currently exists.
- 4.2.4 For the six west London boroughs to meet the apportionment for MSW & C&I waste, an additional 2,100,645 treatment capacity will need to be planned and licensed by 2021 and circa 3,222,380 tonnes by 2026. In order to determine how much area will be required to provide this waste management capacity, an average processing capacity of 54,012 tonnes per annum per hectare was used 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, nor 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 will allow for innovation in the management of waste to be incorporated into development in west London.
- 4.2.6 The identification of the land required to meet the apportionment is displayed in Table 4-2 and shows that by 2026, west London boroughs need to have an additional 22.4 hectares of waste management capacity.

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

	2011	2016	2021	2026
<b>Apportionment (tonnes per annum)</b>	1,399,000	1,595,000	1,798,000	2,019,000
<b>Total existing waste management capacity (tonnes per annum)</b>	811,541	811,541	811,541	811,541
<b>Additional capacity required to meet the apportionment (tonnes per annum)</b>	587,459	783,459	986,459	1,207,459
<b>Land to address the capacity gap (hectares)</b>	10.9	14.5	18.3	22.4

- 4.2.7 The West London Waste Plan has identified land area slightly above its requirements (using existing safeguarded and new sites) to give the Plan flexibility

should some sites not come forward for development during the lifetime of the Plan. Annual monitoring of the plan will prevent overprovision of sites occurring.

- 4.2.8 The Plan identifies 22.4 hectares of land is required to develop waste management capacity by 2026.
- 4.2.9 In order to meet this land allocation, eight existing waste transfer sites (accounting for 19.4 hectares) have been identified as suitable and available for reorientation into waste treatment facilities. An additional 9.2 hectares was identified as potentially deliverable from new sites in west London. Overall, it is thus estimated that within west London there is 28.6 hectares of land potentially available for waste treatment, which exceeds the land allocation required to meet the London Plan (2011) and creates flexibility in the Plan.

### **4.3 What kind of facilities will be needed?**

- 4.3.1 Ensuring that more waste is managed within west London will mean that a range of different waste management facilities will be considered 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 can also be applied making facilities sensitive to their settings, although many technologies can be housed in industrial building similar in appearance to a warehouse. Table 3-4 in Appendix 4 to this report gives a brief description of the principal waste management technologies.
- 4.3.2 It is important that modern methods of dealing with waste are found which also seek to produce valuable, usable products such as fuel, heat and power. Waste 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 attractive to industrial, commercial and potentially residential developments.
- 4.3.3 The West London Waste Plan identifies sites for general waste use and to use the policies within the Plan to manage such developments to ensure they are 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. A planning application will have to be submitted for each proposed development, which will be assessed in line with the West London Waste Plan and other borough plans and strategies and through public consultation.

### **4.4 Construction, demolition and excavation wastes**

- 4.4.1 Construction, Demolition and Excavation (CDE) waste is a large waste stream within London, although it is not included within the apportionment target assigned to boroughs. Accordingly, no allocations are made in this plan for facilities dealing specifically with such wastes. The preference in west London is to ensure more on-site recycling and re-use takes place in accordance with Policy 5.18 of the London

Plan (2011) by using Policy WLWP 4 whilst ensuring that boroughs monitor the types and capacities of waste management facilities developed against any new waste arising data that is produced.

#### **4.5 Hazardous wastes**

- 4.5.1 Hazardous waste can cause concern amongst residents and communities; however it is also not included within the apportionment targets assigned to boroughs. 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 site should be safeguarded unless compensatory provision is made.
- 4.5.2 The West London Waste Plan therefore makes no specific provision for hazardous wastes. However, planning applications for 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.

## 5 The Proposed Sites

5.1.1 The West London Waste Plan, in accordance with the criteria outlined in PPS10, has identified a number of existing and new sites which it considers will ensure adequate waste management provision for the lifetime of the Plan. The sites have been subject to a detailed evaluation and assessment which is documented in the accompanying Technical Report<sup>13</sup>. Further details of these sites including details of their locations, are contained in Appendices 4 and 5 of this Plan.

5.1.2 The Plan identifies (see paragraph 4.2.9) that 28.6 hectares are considered available on existing and new waste sites. Maps showing the location and the site boundary of all sites are provided in Appendices 4 and 5 of the Plan. Table 5-1 sets out those existing sites capable of redevelopment, while Table 5-2 refers to potential new waste sites.

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

Site Number	Site Area (ha)	Borough	Description	Site Type
352	1.46	Brent	Twyford Waste Transfer Station	Transfer Station
1261	2.71	Brent	Veolia Transfer Station, Marsh Road	Transfer Station
309	1.15	Ealing	Greenford Reuse & Recycling Site,	Transfer Station
310	0.94	Ealing	Greenford Depot, Greenford Road,	Depot Facility
328	2.10	Ealing	Quattro, Victoria Road, Park Royal	Transfer Station
303	4.25	Hillingdon	Victoria Road Transfer Station	Transfer Station
353	3.11	Hounslow	Transport Avenue Waste Transfer Station	Transfer Station
342	3.67	Richmond	Twickenham Depot	Depot Facility

<sup>13</sup> WLWP Technical Report November 2011 - <http://www.wlwp.net/documents.html>

Table 5-2: Proposed new sites with opportunity for developing waste management facilities

Site Number	Site Area (ha)	Borough	Description
222	2.83	Harrow	Council depot, Forward Drive
244	3.12	Hillingdon	Yeading Brook, Bulls Bridge
2861	3.20	Hounslow	Western International Market

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## 6 West London Waste Plan Policies

### 6.1 Policy WLWP 1 – Safeguarding and protection of Existing sites

#### **WLWP Policy 1 – Safeguarding and Protection of Existing and Allocated sites**

Land accommodating existing waste management and waste transfer uses in west London will be safeguarded for continued use for waste facilities (Annexe 4 Table 4.1 and 4.2). Sites in Annexe 5 Table 5.1 are also allocated for waste use. Development for non-waste uses will not be considered on the land identified in these three tables unless compensatory and equal provision of sites for waste, in scale and quality, is made elsewhere within the west London Boroughs.

- 6.1.1 Table 4.1 and 4.2 in Appendix 4 list the sites that are in existing waste management use in the west London boroughs. All these sites are safeguarded in the Plan as required by the London Plan (2011). The safeguarded sites form an essential resource for dealing with waste within the Plan area and protection of these sites reduces the requirement for any additional sites.
- 6.1.2 The sites in Table 4.2 are those existing sites the Plan considers have the potential for redevelopment to waste management sites including alternative forms of waste management that could result in waste moving up the hierarchy. Table 5.1 of Appendix 5 contains the list of new sites that are allocated in the Plan for waste treatment facilities. The protection of these sites is required to ensure that the west London boroughs can comply with the apportionment requirement of the London Plan (2011).
- 6.2 Policy WLWP 2 – Location of Waste Development**
- 6.2.1 As explained above in Section 3, in order to conform with central Government planning requirements and be considered a "sound" planning document, the Plan has been prepared on the basis of the waste planning apportionment figures in the current adopted London Plan (2011). Consequently, the Plan has identified over 28.6 ha of land for the development of waste management facilities to meet the pooled apportionment for the six west London boroughs up to 2026.
- 6.2.2 All existing waste management sites in the six boroughs, with potential for re-orientation, along with the allocated sites are safeguarded for waste management uses under this Plan, unless an equal and compensatory site can be found, or there is an appropriate level of movement up the waste hierarchy.

- 6.2.3 The West London Waste Plan lists the safeguarded existing sites and proposed new sites considered appropriate and suitable for waste management use in (Table 4-1, 4-2 of Appendix 4 and Table 5.1 of Appendix 5). Policy WLWP 2 sets out the key criteria against which planning applications for waste facilities will be determined for the proposed sites.

#### **WLWP Policy 2 – Location of Waste Development**

Waste development proposals on sites listed in Tables 4-1, 4-2 and 5.1 will generally be supported, provided that the proposals comply with the other WLWP policies and the boroughs' adopted development plans.

Waste development on other sites, not listed in Tables 4-1, 4-2 and 5.1, may be permitted if the proposals comply with the other WLWP policies and the boroughs' adopted development plans, and:

- It can be demonstrated that the development is not suitable for, or cannot be delivered at, any sites listed in Tables 4.1 and 5.1; and
- For some reason, identified sites have not come forward and it can be demonstrated that there is an emerging shortfall in capacity.

To ensure no loss in existing capacity, re-development of any existing or allocated waste 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 permitted to manage, or that the management of the waste is being moved up the waste hierarchy.

#### **6.3 Policy WLWP 3 – Ensuring High Quality Development**

- 6.3.1 Modern waste management facilities should bring a benefit to the local community and environment. Policy WLWP 3 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 any adopted borough Development Plans, including Core Strategies, Development Management DPDs, Site Allocations and Area Action Plans
- 6.3.2 As a general principle, all waste developments will be expected to complement the surrounding area and act as a good neighbour to all existing developments.
- 6.3.3 Noise, litter and all other emissions are expected to 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.



- 6.3.4 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 colour. A Design and Access statement should be submitted to set out how the facility complements the local area and ensure that there is no adverse effect on existing transport facilities, Public Rights of Way, or public safety.
- 6.3.5 The road network within west London is regularly congested and therefore proposals must demonstrate active consideration of alternative transport uses. 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 and that any necessary changes to the local road network are made.
- 6.3.6 Developers of waste facilities will need to fully identify the health implications of the development and plan the most appropriate development to protect the surrounding uses and community. If the proposed waste development is required to have an Environmental Impact Assessment, then a Health Impact Assessment is also required.

### **WLWP Policy 3 – Ensuring High Quality Development**

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

- Development will be permitted only where it can be shown that unacceptable impact to local amenity will not arise from the construction and/or operation of a facility.
- Adequate means of controlling noise, vibration, dust, litter, vermin, odours, air and water-borne contaminants and other emissions are incorporated into the scheme;
- 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.
- Active consideration has been given to the transportation of waste by modes other than road, principally by water and rail;
- 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;
- The development makes a positive contribution to climate change adaptation

and mitigation to be demonstrated through the submission of a sustainable design and construction statement;

- An appropriate BREEAM or CEEQUAL rating will be required to comply with any adopted borough Development Plans;
- The development has no significant adverse effects on local biodiversity and that 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”;
- There will be no significant impact on the quality of surface and groundwater. The development should incorporate the principles of Sustainable Urban Drainage Systems (SUDS) unless evidence is provided to justify alternative drainage methods.
- There will be no increased flood risk, either to the immediate area or indirectly elsewhere, in line with PPS25. Where necessary, this is to be demonstrated by a Flood Risk Assessment;
- Green Travel Plans have been considered, where appropriate.
- The site does not contain features, or will have a significant adverse effect on any heritage assets such as conservation areas, archaeological sites listed building etc.
- There is no foreseeable adverse impact on health and where necessary this is to be demonstrated by a Health Impact Assessment

In addition:

- 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.
- Applications shall provide details of the management arrangements for residues arising from any waste management facility.

## 6.4 Policy WLWP 4 – Decentralised Energy

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

6.4.2 The London Plan (2011) encourages boroughs to take opportunities for the development of combined heat and power technologies.

### Policy WLWP 4 – Decentralised Energy

All waste 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 utilisation of biogas/syngas in Combined Heat and Power facilities, either directly through piped supply or indirectly through pressurisation and transport;
- The utilisation 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 are a recovery facility as defined in the Waste Framework Directive.

## 6.5 Policy WLWP 5 – Sustainable Site Waste Management

6.5.1 The management of waste in accordance with the waste hierarchy is a key element of European, National and regional policy. West London supports 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. Waste minimisation is also an important issue to the residents and community within West London.

- 6.5.2 West London supports 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.

#### **WLWP Policy 5 - Sustainable Site Waste Management**

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

- 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;
- Construction, demolition and excavation wastes are reused or recycled on site, where practicable and environmentally acceptable; and
- Construction phase Site Waste Management Plans are comprehensive and capable of being delivered.

## 7 Monitoring of the West London Waste Plan

7.1.1 Once the West London Waste Plan is adopted, key performance indicators are proposed to be reported each year in the boroughs' Annual Monitoring Report to assess the effectiveness of the Plan's policies. This mechanism will enable the west London boroughs to compare quantities of waste actually produced with those forecast in the London Plan (2011) 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. The proposed indicators that will be reported both for each borough and the six combined west London boroughs include:

- Quantity of each type of waste produced;
- Total capacity (in tonnes) of new waste management facilities given planning permission in the previous year, by process (e.g. recycling, composting, anaerobic digestion etc) and against annual forecast of quantity of waste produced and how the new, additional, capacity, affects the total capacity within the plan area;
- Capacity (in tonnes) of new waste management facilities on existing sites (including re-developed transfer sites), on new sites allocated within the West London Waste Plan, and on non-allocated sites;
- The quantity of municipal waste generated per household;
- Re-use, recycling and composting figures for municipal waste;
- The quantity of municipal waste landfilled;
- Comparison of municipal and commercial & industrial waste that is managed compared with the apportionment targets set out in the London Plan (2011);
- Tonnage of construction, demolition and excavation waste produced and disposed of in the boroughs;
- Tonnage of hazardous waste produced and disposed of in the boroughs; and
- Other indicators that may be decided to measure performance against policies.

7.1.2 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 correct any problems.

7.1.3 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	Indicator	Reason	Delivery	Delivery Agency
Policy WLWP 1 & 2	Number of safeguarded sites list and amount of compensatory measures achieved	To ensure no loss of waste capacity in the west London area	The planning process	Local Authorities
Policy WLWP 3	Number, type and capacity of waste facilities approved and completed at: safeguarded sites and new identified sites  Impact of new sites	Compliance with sequential policy approach  To ensure adequate waste capacity is being provided  Number of sites failing to comply with any relevant environmental permit  Number of enforcement complaints breaches of conditions	The planning process and combined private and public initiative to provide waste management developments	Wes London Waste Authority and private sector
Policy WLWP 4	Amount of energy produced and delivered	To ensure compliance with the aims of the London Plan 2011 and	Through the planning process	

WLWP Policy	Indicator	Reason	Delivery	Delivery Agency
		required carbon savings		
Policy WLWP 5	Amount of construction waste sent to landfill	Reduce amount of waste sent to landfill	Use of site waste management plans monitoring and enforcement of these and planning conditions	Developers West London Boroughs

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## 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 Apportionment'.
Area Action Plan	Type of Development Plan Document focused on a specific location or area which guides development and improvements. It forms one component of a Local Development Framework.
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 organic 'fibre'.
Biodegradable	Biodegradable materials are generally organic, such as plant and animal matter and other substances originating from living organisms. They can be chemically broken down by naturally occurring micro-organisms into simpler compounds. Waste which contains organic material can decompose producing bio-gas, leachate and other by-products.
Biodegradable Municipal Waste (BMW)	The proportion of waste from households 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).
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 combined production 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.
Commercial Waste	Waste produced from premises used solely or mainly, for the purpose of a trade or business or for sport, recreation or entertainment.



Term/Acronym	Definition
Commercial and Industrial Waste (C&I)	Waste arising from business and industry. Industrial waste is waste generated by factories and industrial plants. Commercial waste is waste produced from premises used solely or mainly, 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 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 comprised of concrete, brick, stone and soil, but can also include metals, plastics, timber and glass.
Core Strategy	A Local Development Document (which is also a Development Plan Document) which provides a written statement of the core policies for delivering the spatial strategy and vision for a borough, supported by a reasoned justification.
Department for Communities and Local Government (DCLG)	The 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 sustainable waste management amongst other things.
Development Management Document	A set of criteria-based policies in accordance with the Core Strategy, against which planning applications for the development and use of land and buildings will be considered. Also known as Site Development Policies.
Development Plan Document (DPD)	These are statutory local development 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 status and are subject to community involvement, public consultation and independent examination.
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 recovered to provide hot water and steam (usually) for electricity generation (see also Recovery).

Term/Acronym	Definition
Environment Agency (EA)	Environmental regulatory authority formed in 1996, combining the functions of the former National Rivers Authority, Waste Regulation Authorities and Her Majesty's Inspectorate of Pollution.
European Waste Catalogue <sup>14</sup> (EWC)	All 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.
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.
Examination	Presided over by an Inspector or a Panel of Inspectors 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 Development Plan Documents are sound. Only persons who have made representations seeking change to a Development Plan 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 is then used to produce heat/electricity.
Greater London Authority (GLA)	The GLA is a unique form of 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 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 <sup>2</sup> 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 impacts of plans and projects on internationally designated sites and nature conservation sites.

<sup>14</sup> The full catalogue can be downloaded from [http://www.environment-agency.gov.uk/static/documents/Leisure/EWC\\_31-03-09\\_CH.pdf](http://www.environment-agency.gov.uk/static/documents/Leisure/EWC_31-03-09_CH.pdf)

Term/Acronym	Definition
Hazardous Waste	Waste that contains 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.
Household Waste	Waste from a private dwelling or residential house or other such specified premises, and includes 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.
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.
Industrial Waste	Waste from a factory or industrial process.
Inert Waste	Waste that is not active – it does not decompose or otherwise change.
In-vessel Composting (IVC)	Shredded waste is placed inside a chamber or container through which air is forced. This speeds up the composting process. 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. This 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 should act as an up to date, regularly reviewed, route-map for further investment required.
Kerbside Collection	Any regular collection of recyclables from premises, including collections from commercial or industrial premises as well as from households. Excludes collection services delivered on demand.
ktpa	kilo-tonnes per annum (a kilo-tonne is 1,000 tonnes).

Term/Acronym	Definition
Landfill	The deposit 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.
Local Development Framework (LDF)	A portfolio of local development documents that will provide 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.
London Plan	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' Unitary Development Plans. It will perform this function in respect of Local Development Frameworks. 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 Apportionment	Allocates to each individual borough a given proportion of London's total waste (expressed in tonnes) for which sufficient sites for managing and processing waste must be identified within their Local Development Frameworks.
Materials Recycling Facility or Materials Recovery Facility (MRF)	A special 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.
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.
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.
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.

Term/Acronym	Definition
Planning Policy Statement 10 (PPS10)	Guidance documents produced by central government relating to 'Planning for Sustainable Waste Management' which set out a number of key concepts which should be considered and statutory requirements of local and regional planning policy documents.
Planning Policy Statement 12 (PPS12)	Guidance documents produced by central government relating to 'Local Spatial Planning'.
Planning Policy Statement 25 (PPS25)	Guidance documents produced by central government relating to 'Development and Flood Risk' which aims to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas of highest risk
Preferred Industrial Location (PIL)	Strategic employment site normally suitable for general industrial, light industrial and warehousing uses.
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 secondary fuel product.
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.
Recycling	Recovering re-usable materials from waste or using a waste material for a positive purpose.
Refuse Derived Fuel (RDF)	Material produced from waste that has undergone processing. Processing can include separation of recyclables and non-combustible materials, shredding, size reduction, and pelletising.
Re-use	The re-use of materials in their original form, without any processing other than cleaning.
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.

Term/Acronym	Definition
Self-sufficiency	Dealing with wastes within the administrative region where they are produced.
Site Development Policies	A set of criteria-based policies in accordance with the Core Strategy, 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 specifically defined area which protects ecological or geological features.
Site Waste Management Plan (SWMP)	A detailed plan setting out how waste will be managed during a construction project. This is a legal requirement for most construction projects.
Solid Recovered Fuel (SRF)	These are solid fuels (also known as 'Refuse Derived Fuels' – RDF) prepared from non-hazardous waste to be utilised for energy recovery.
Sound (Soundness)	According to PPS 12 (¶4.52) for a plan to be “sound” it should be 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
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)	A SSSI 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.
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 system of incorporating environmental considerations into policies, plans and programmes. It is sometimes referred to as Strategic Environmental Impact Assessment and is a legally enforced assessment procedure required by Directive 2001/42/EC.

Term/Acronym	Definition
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 which analyses and evaluates the environmental, social and economic impacts of a plan or programme.
Sustainability Appraisal Commentary	A commentary report that raises sustainability issues relating to the Issues and Options report.
Transport for London (TfL)	An integrated body responsible for the Capital'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, that is to be replaced by Local Development Frameworks.
Waste Arising	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 waste e.g. your local council.
Waste Development Plan Document (WDPD)	Planning document which will provide a basis for the provision of waste management infrastructure in the 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).
Waste Hierarchy	An order of waste management methods, enshrined in European and UK legislation, based on their predicted sustainability. The hierarchy is summarised as "reduce (prevent), re-use, recycle/compost, recover, dispose".
Waste Management Capacity	The amounts of waste currently able to be managed (recycled, composted or recovered) by waste management facilities within west London.

Term/Acronym	Definition
Waste Management Licence (WML)	The licence required by anyone who proposes to deposit, recover or dispose of controlled waste. These are now known as Environmental Permits.
Waste Minimisation	Reducing the volume 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 the six boroughs are the Waste Planning Authority for their area.
Waste Transfer Station	A facility where waste is delivered for sorting prior to transfer to another place e.g. landfill.
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 Development Plan Document being produced for west London (see 'Waste Development Plan Document').



## 9 Appendices

**Appendix 1: Sustainability Appraisal**

**Appendix 2: General waste treatment facility descriptions**

**Appendix 3: Borough waste projection and apportionment figures - London Plan (2011)**

**Appendix 4: Map of existing waste management sites considered to have potential for re-development as waste management facilities**

**Appendix 5: Map of proposed new sites with opportunity for developing waste management facilities**

## Appendix 1 - Sustainability Appraisal

The purpose of Sustainability Appraisal is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of revisions of Regional Spatial Strategies and for new or revised Development Plan Documents and Supplementary Planning Documents.

This process will ensure that planning decisions are made that accord with the principles defined in the Government's UK Sustainable Development agenda<sup>15</sup>. The timing of the Sustainability Appraisal aims to ensure that sustainability considerations are taken into account early in the process of policy development.

Sustainability Appraisals must also, where appropriate, incorporate the requirements of the Strategic Environmental Assessment Directive (2001/EC/42) (SEA Directive)<sup>16</sup>. The SEA Directive requires that a formal assessment is undertaken of plans and programmes which are likely to have significant effects on the environment. This has been transposed into UK law through the SEA Regulations (July 2004)<sup>17</sup>. The purpose of the SEA Directive is "to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development".

### Sustainability Appraisal Approach

The approach adopted for the Sustainability Appraisal was iterative and involved a high degree of interaction between those individuals responsible for the Sustainability Appraisal and those individuals responsible for development of the Plan.

### Scoping

The first stage in the Sustainability Appraisal process (Stage A of DCLG guidance) involves assembling information on the existing environmental, social and economic baseline to provide a starting point for appraising the effects of implementing the Plan. To provide a sound basis for analysis, the Sustainability Appraisal Scoping Report also identified relevant plans and programmes, key sustainability issues and problems and detailed a Sustainability Framework through which the appraisal could

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<sup>15</sup> Defra Sustainable Development Unit - <http://www.sustainable-development.gov.uk/publications/uk-strategy/framework-for-sd.htm>.

<sup>16</sup> European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment" (the Strategic Environmental Assessment or 'SEA Directive')

<sup>17</sup> The Environmental Assessment of Plans and Programmes Regulations. Statutory Instrument 2004 No. 1633.

take place; this information was reported in the form of the Sustainability Appraisal Scoping Report<sup>18</sup>.

## Issues and Options

The Issues and Options vision and objectives were tested for compatibility with the Sustainability Appraisal objectives through a compatibility matrix. During development of the draft issues and options for the Plan, the draft Sustainability Framework set out in the Sustainability Appraisal Scoping Report was applied to each potential option (Stage B of DCLG guidance).

A Sustainability Commentary<sup>19</sup> was produced in which the key findings were provided in association with each of the identified issues and options. The Sustainability Commentary was prepared to meet the requirements of DCLG guidance (para 3.39) *“As each option is refined, a commentary on the key sustainability issues and problems arising must be prepared, with recommendations on how each of the options could be improved, e.g. through mitigation measures.”*

## Proposed Sites and Policies/Draft Plan

The Proposed Sites and Policies for the Plan were developed taking into account findings presented in the Sustainability Commentary as well as the results of consultation on the Issues and Options and relevant evidence base material.

The Proposed Sites and Policies were tested for compatibility with the Sustainability Appraisal Objectives and the results were taken into account, as necessary, during further drafting and refinement of the options.

The Site Assessment Criteria used to evaluate the long list of sites were assessed using the Sustainability Appraisal objectives, and the results were incorporated into the Plan.

The majority of the Sustainability Appraisal objectives are addressed by the site selection criteria. When it was considered that the objectives were not being met, mitigation was recommended and incorporated into the Plan.

The policies contained within the Plan were assessed against sustainability objectives. Where mitigation was recommended this has been addressed where appropriate in the Plan.

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<sup>18</sup> Sustainability Appraisal Scoping Report for the WLWP July 2008.

<sup>19</sup> West London Waste Plan Issues and Options, Sustainability Appraisal, Sustainability Commentary, February 2009.

The SEA Directive requires the significant environmental effects of implementing the plan or programmes to be monitored “*in order to identify unforeseen adverse effects and to be able to undertake remedial action*” (Article 10(1)). Responsible Authorities must ensure when designing their monitoring arrangements that they comply with this provision. This guidance uses the term ‘SEA monitoring’ to cover the overall monitoring of environmental effects. The Sustainability Appraisal Report includes draft monitoring recommendations and these will be updated following the consultation period.

## Reporting

Outputs from the Sustainability Appraisal are presented in this Sustainability Appraisal Report which is designed to fulfil the requirements of the SEA Directive in respect of the Strategic Environmental Assessment Environmental Report. This report is published alongside the Proposed Sites and Policies Report.

## 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 in Planning Policy Statement 25<sup>20</sup>, 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 Proposed Sites and Policies to ensure that no target group experiences a high level negative impact from the West London Waste Plan. The EqIA will be published alongside the Proposed Sites and Policies/ Draft Plan.

## Habitats Regulations Assessment

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<sup>20</sup> *Planning Policy Statement 25: Development and Flood Risk – DCLG, 2006.*

The Habitats Regulations Assessment relates to Natura 2000 sites designated under the European Habitats and Birds Directives<sup>21</sup>.

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 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, was undertaken.

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. This Screening Report is published alongside the Proposed Sites and Policies and will be available to individuals and organisations involved in consultation on the Proposed Sites and Policies.

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

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<sup>21</sup> *European Directive 92/43/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.*

## Appendix 2: General Waste Treatment Facility Description

Facility type	General Description	General Appearance
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.
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.
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.
Mechanical Biological Treatment (MBT)	MBT is generally used to treat general (residual) waste (that is waste that is not in the recycling bin) from homes and businesses. The waste is treated biologically and mechanically which essentially separates the materials suitable for recycling from an organic fraction which is generally used as a fuel or can be composted.	Generally housed inside warehouse type buildings.
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.
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 chimney.

## Appendix 3: 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
<b>Totals</b>	<b>798</b>	<b>1,287</b>	<b>826</b>	<b>1,258</b>	<b>852</b>	<b>1240</b>	<b>879</b>	<b>1,233</b>	<b>900</b>	<b>1,236</b>

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
<b>Totals</b>	<b>505</b>	<b>898</b>	<b>612</b>	<b>979</b>	<b>731</b>	<b>1067</b>	<b>855</b>	<b>1162</b>	<b>982</b>	<b>1267</b>

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

## Appendix 4: Details of Existing Waste Management Sites considered to have potential for re-development as waste management facilities

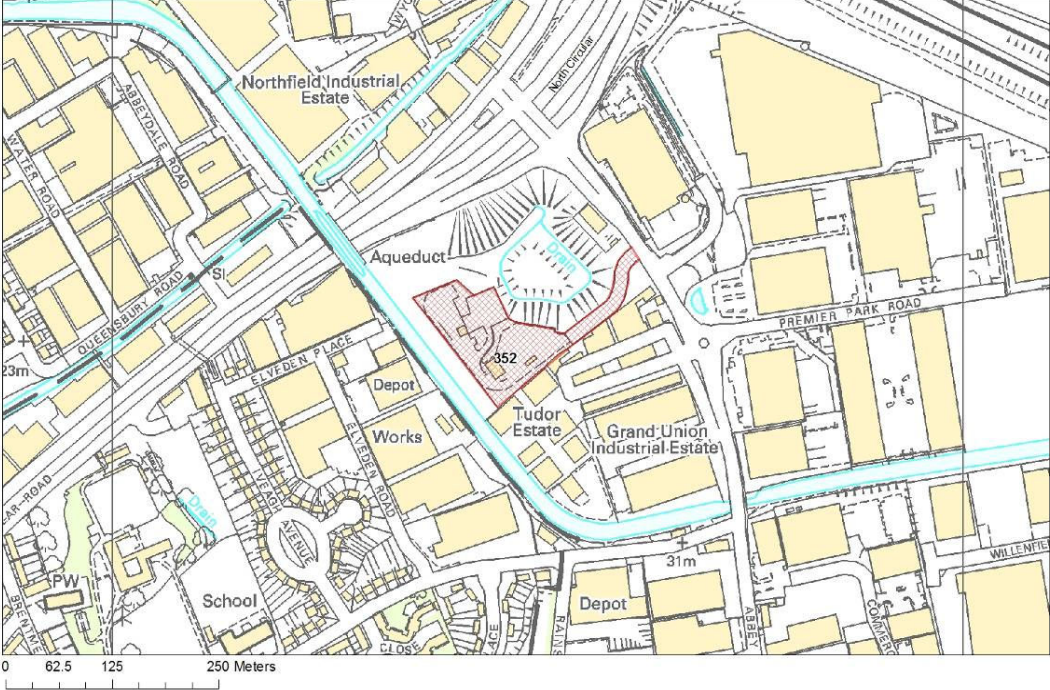
**Table 4-1 Existing Waste Management and Waste Transfer Sites**

*Table 4-2: Existing waste sites considered to have potential for redevelopment*

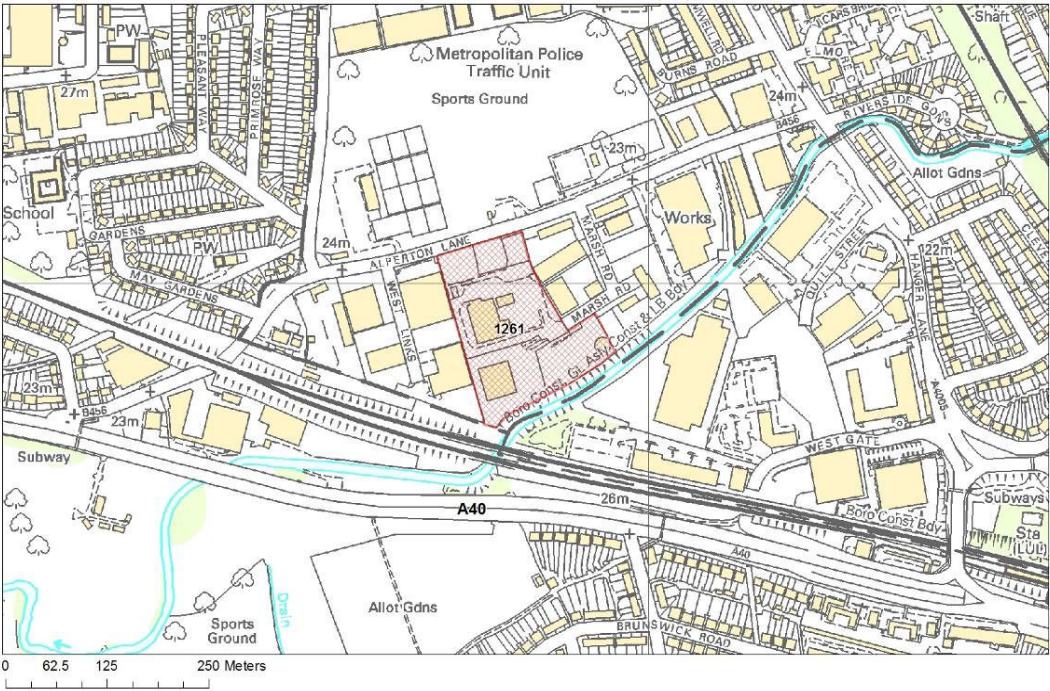
Site Number	Site Area (ha)	Borough	Description	Site Type
352	1.46	Brent	Twyford Waste Transfer Station	Transfer Station
1261	2.71	Brent	Veolia Transfer Station, Marsh Road	Transfer Station
309	1.15	Ealing	Greenford Reuse & Recycling Site	Transfer Station
310	0.94	Ealing	Greenford Depot, Greenford Road	Depot Facility
328	2.10	Ealing	Quattro, Victoria Road, Park Royal	Transfer Station
303	4.25	Hillingdon	Victoria Road Transfer Station	Transfer Station
353	3.11	Hounslow	Transport Avenue Waste Transfer Station	Transfer Station
342	3.67	Richmond	Twickenham Depot	Depot Facility



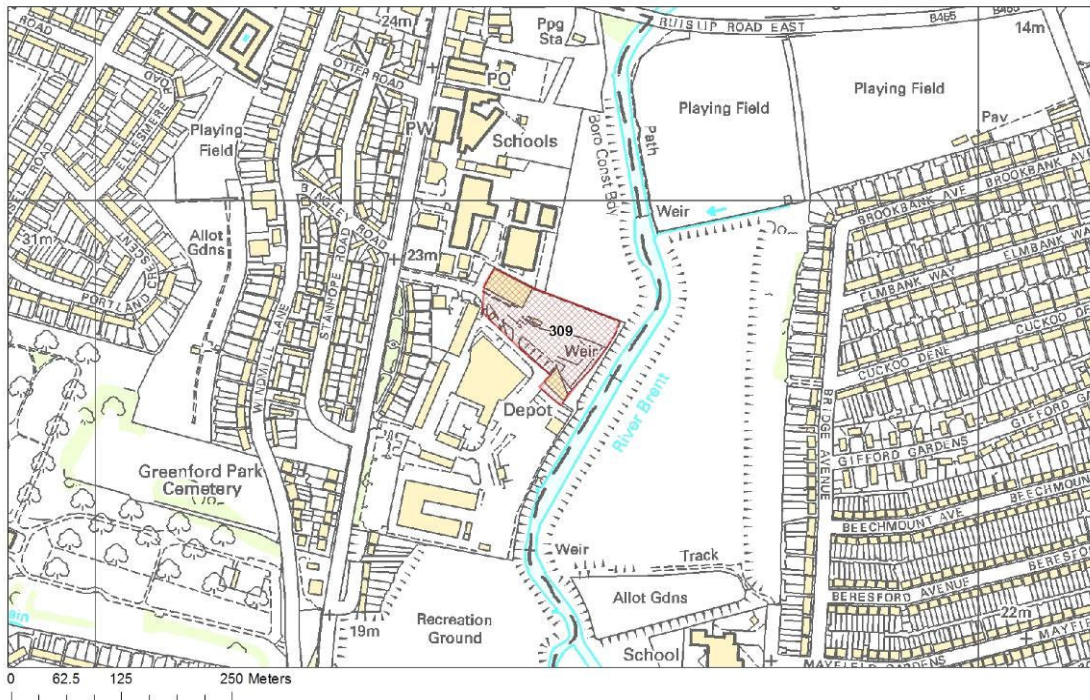
Site 352 Twyford Waste Transfer Station, Abbey Road, Brent



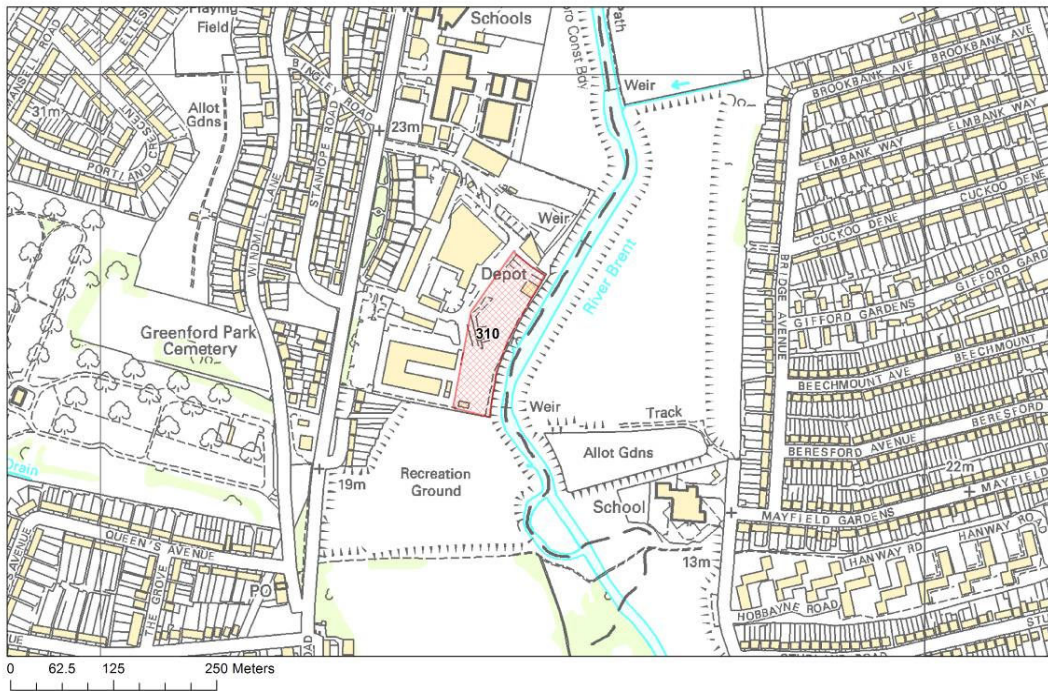
Site 1261 Veolia Transfer Station, Marsh Road, Alperton, Brent



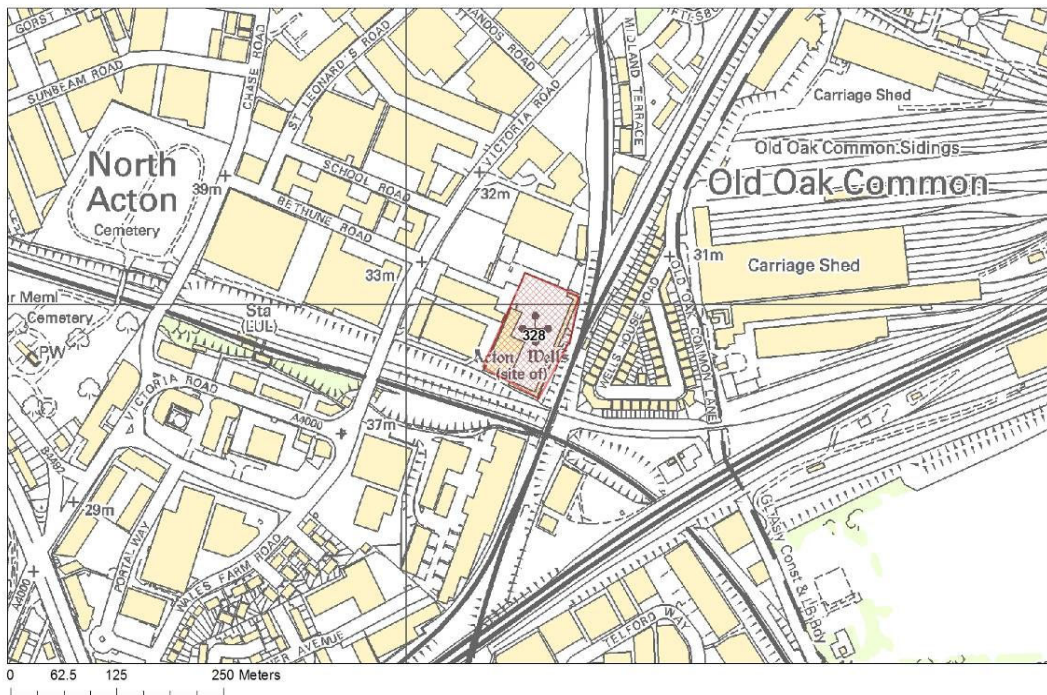
Site 309 Greenford Reuse & Recycling Site, Greenford Road, Greenford, Ealing



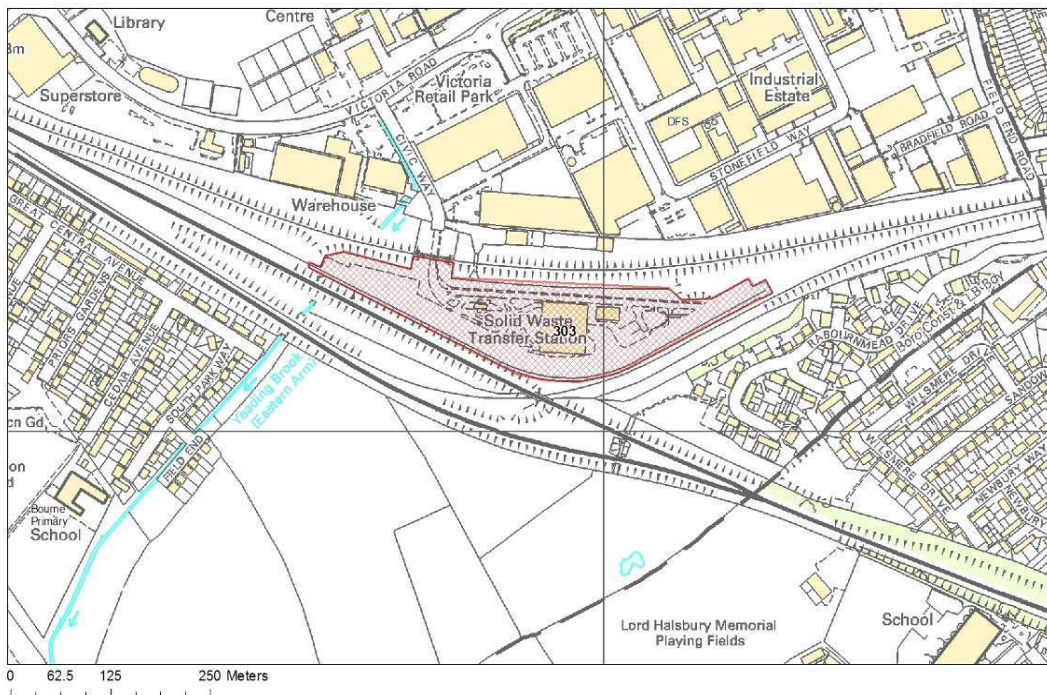
Site 310 Greenford Depot, Greenford Road, Greenford, Ealing



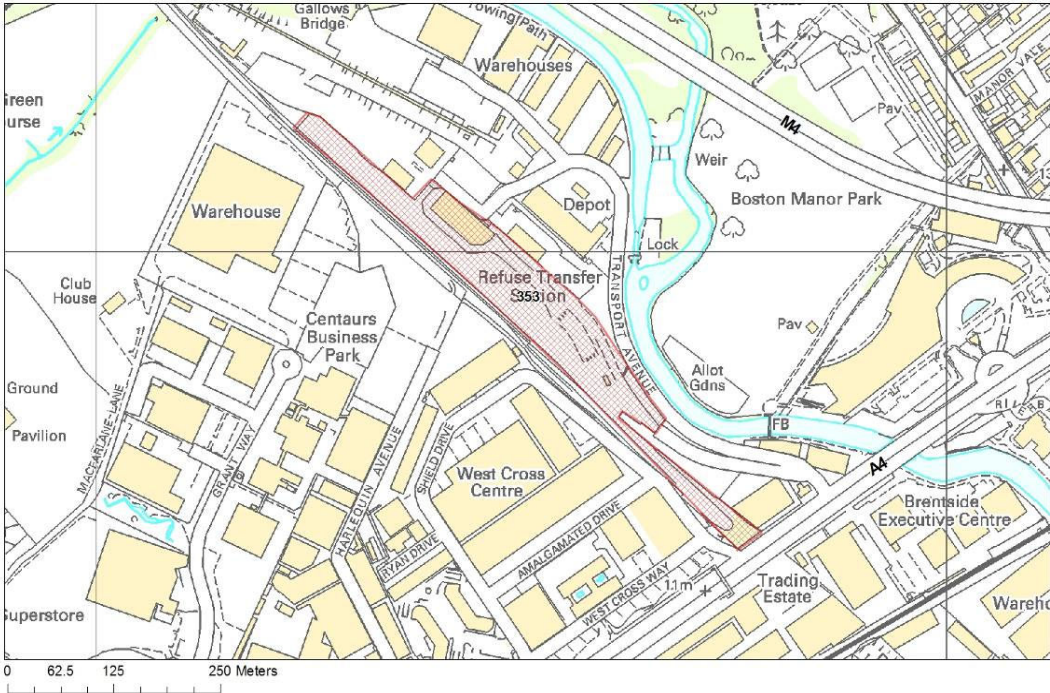
Site 328 Quattro, Victoria Road, Park Royal, Ealing



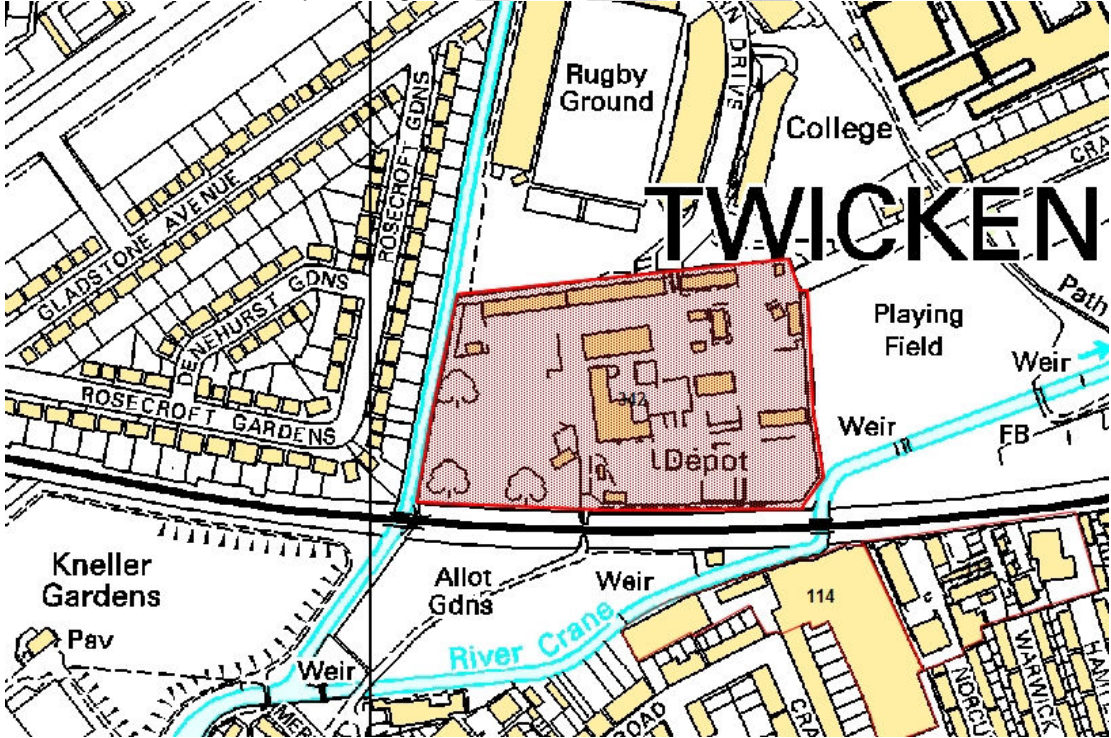
Site 303 Victoria Road Waste Transfer Station, Civic Way, Hillingdon



Site 353 Transfer Avenue Waste Transfer Station, Brentford, Hounslow



Site 342 Twickenham Depot, Langhorn Drive, Twickenham, Richmond

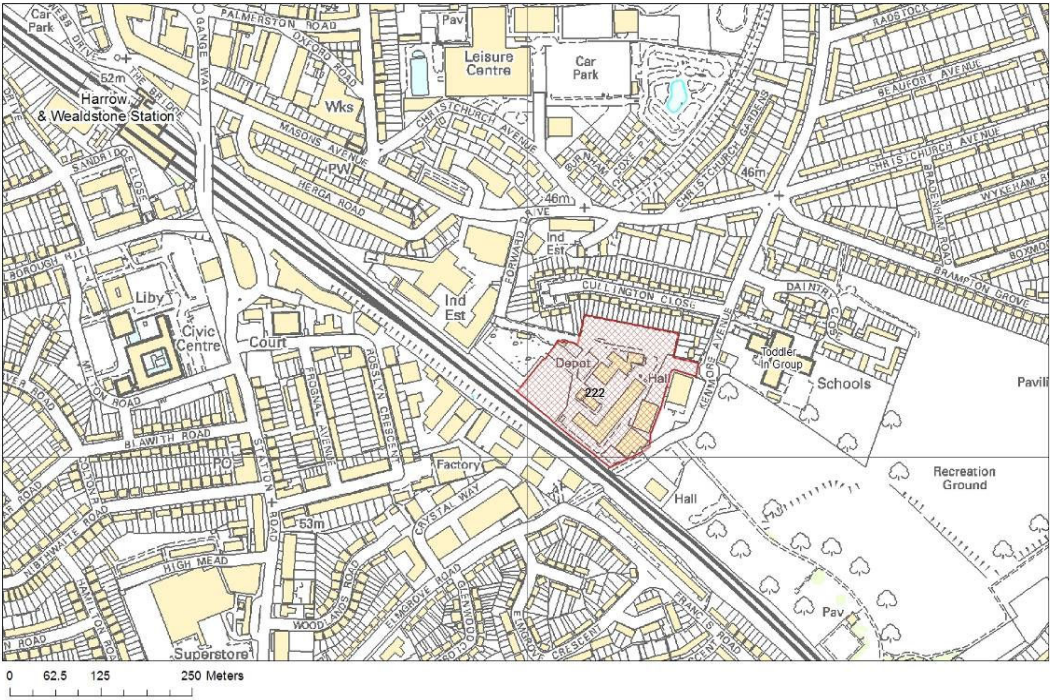


# Appendix 5: Details of Proposed New Sites with opportunity for developing waste management facilities

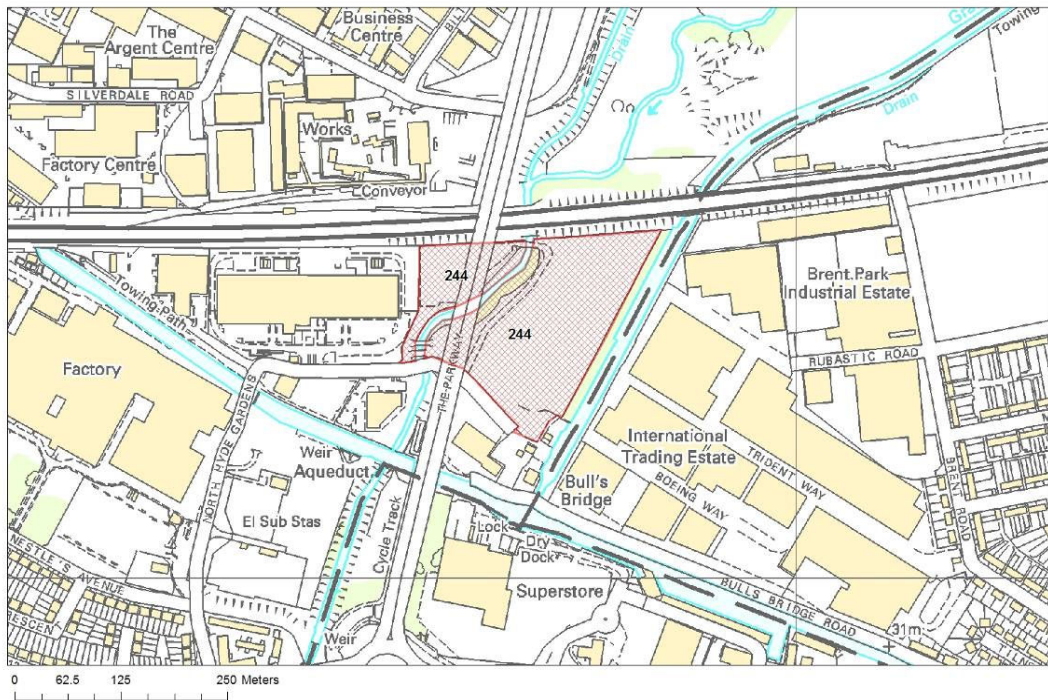
Table 0-2: Proposed new sites with opportunity for developing waste management facilities

Site Number	Site Area (ha)	Borough	Description
222	2.83	Harrow	Council depot, Forward Drive
244	3.12	Hillingdon	Yeading Brook, Bulls Bridge
2861	3.20	Hounslow	Western International Market

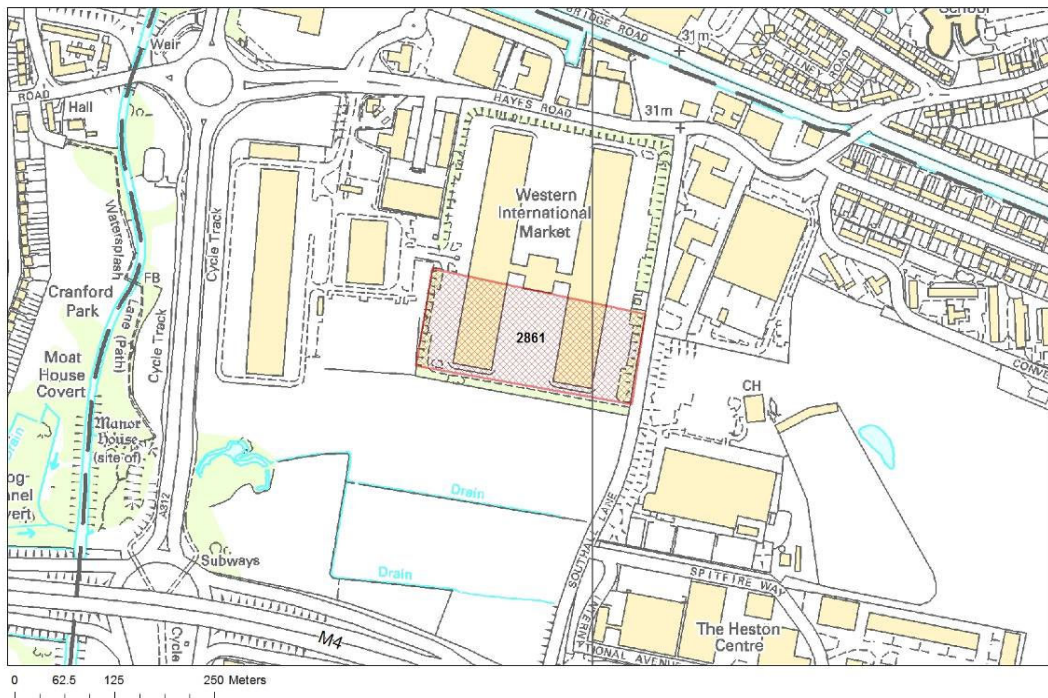
Site 222 Council Depot, Forward Drive, Harrow



Site 244 Yeading Brook, Former Powergen Site, Bulls Bridge, Hayes, Hillingdon



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



**REPORT FOR: OVERVIEW AND  
SCRUTINY COMMITTEE**

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Date of Meeting:	13 <sup>th</sup> December 2011
Subject:	Strategic overview of Voluntary Sector support and update on implementation of Third Sector Strategy
Responsible Officer:	Marianne Locke, Divisional Director Community and Culture
Scrutiny Lead Member area:	Councillor Chris Mote, Policy Lead – Safer and Stronger Communities  Councillor Nana Asante, Performance Lead – Safer and Stronger Communities
Exempt:	No
Enclosures:	Appendix 1: Third Sector Strategy Appendix 2: Third Sector Investment Plan Appendix 3: Third Sector Strategy action plan progress update Appendix 4: Draft Third Sector Strategy action plan: future priorities

**Section 1 – Summary and Recommendations**

This report provides an overview of Council support to the Voluntary Sector and an update on the implementation of the Third Sector Strategy.

**Recommendations:**

The Overview and Scrutiny committee is requested:

1. To note progress against the action plan for the Third Sector Strategy and current developments regarding Council support to the Voluntary Sector.

- |   |
|---|
| <p>2. To consider proposed updated actions (Appendix 4) in the light of these developments which will be the subject of consultation with the Third Sector in January 2012.</p> |
|---|

## **Section 2 – Report**

### **2.1 Introductory paragraph**

- 2.1.1 This report provides an overview of Council support to the Voluntary Sector and an update on the implementation of the Third Sector Strategy. The terms ‘Voluntary Sector’ and ‘Third Sector’ are often used interchangeably and generally refer to not-for-profit organisations set up to achieve social benefit. To ensure consistency, this report will use the term Third Sector as defined in the Third Sector Strategy:

*Not for profit independent, voluntary and community groups or organisations formed by local people, or those with a local interest, to improve the quality of lives for themselves and/or fellow citizens in Harrow. These include registered charities; voluntary organisations; community groups; faith groups involved in social action; community interest companies and; social enterprises.*

- 2.1.2 The Council is committed to supporting the Third Sector and recognises the valuable contribution it makes in providing services to local residents. In recent years the Council has sought to ensure that it aligns the provision of that support to the delivery of its Corporate Priorities. This report sets out developments that have taken place in achieving this and the future direction of Council support to the Third Sector.

### **2.2 Background**

- 2.2.1 In 2008, the Overview and Scrutiny committee published its report ‘Delivering a strengthened voluntary sector’. Twenty-one of the recommendations were accepted by Cabinet in March 2009. In response to these recommendations, the Council conducted a consultation with the Third Sector in 2009 on revisions to the grant application process that resulted in changes to the 2010-11 grant application process. These changes included the introduction of a scoring mechanism and revisions to the grant eligibility criteria.
- 2.2.2 In 2010, consultation was undertaken to inform the development of the Third Sector Strategy (Appendix 1) which was adopted by Cabinet in April 2010. The Strategy sets out the Council’s strategic view of its future relationship with the Third Sector. The Strategy’s action plan now requires revision for the next phase of implementation.
- 2.2.3 In 2011, further consultation was undertaken with the Third Sector on reviewing the way that Council support was provided. As a result of this consultation the Council approved the Third Sector Investment Plan 2012-15 in October 2011 (Appendix 2).



## 2.3 Current situation

2.3.1 A cross-corporate internal stakeholders' working group was reinstated in November 2010 to monitor the delivery of actions against the Third Sector Strategy and as a consultation group for the development of strategic support for the sector (such as the Funding and Procurement Compact Code and the Third Sector Investment Plan). It is proposed to hold a workshop in January 2012 with the Third Sector to as part of the next stage of reviewing progress against the strategy and revising the action plan and to seek nominations from the sector to become part of the working group.

2.3.2 The objectives of the Third Sector Strategy have been delivered to date in the following ways (see action plan update Appendix 3):

**(i) Objective 1: To deepen partnership working by strengthening the role of the Third Sector as a strategic partner;**

- The Funding and Procurement code of the Compact is currently being updated in consultation with internal and external stakeholders so that it reflects proposed changes to funding and commissioning arrangements. The new revision will be circulated to the HSP VCS reps in December 2011 for final comments before formal adoption early in the new year.
- The new HSP structure reflects the current strategic role of the partnership in particular with strategic direction. Three sector representatives are on the HSP Board and all five reps are part of the HSP Assembly. The VCS are holding elections for these positions in May 2012 through the Voluntary Sector Forum and will be supported by the Council.
- The Grants Advisory Panel has a VCS representative to advise on matters and the sector has been consulted on the proposals for the Third Sector Investment Plan and changes to grant application processes.
- The VCS representatives were members of the HAVS 'Way Forward' Group which supported HAVS trustees in a potential turnaround project and are key members of the Interim CVS Board with the Council, from developing a specification for interim services to monitoring and developing services for the future.

**(ii) Objective 2: To build the capacity of the Third Sector to help it change itself to address the future;**

The move towards commissioning will be a challenge for many Third Sector organisations, however, the Third Sector itself recognises the need to change itself to address the future. The Council has put in place training workshops to support the Third Sector and further support to help organisations prepare for commissioning is also planned. Following the difficulties at Harrow

Association of Voluntary Service (HAVS) the Council commissioned a new Interim CVS service from a consortium of Ealing, Hillingdon, Hammersmith and Fulham CVS. The new service started in September 2011 and will be in place until 31<sup>st</sup> March 2012. The interim service is working closely with the Council and Third Sector representatives to provide capacity building and fundraising support, volunteer brokerage, ICT support and training workshops. The consortium is also supporting the Voluntary Sector Forum and Interim CVS board in undertaking a consultation to inform the service specification for a potential new infrastructure support service.

**(iii) Objective 3: Enabling participation by increasing opportunities for Third Sector involvement in the design and delivery of public services through a more transparent commissioning process and improving the management and administration of grant funding.**

The Third Sector Investment Plan will deliver a transparent commissioning process for securing services that align with the Council's corporate priorities. With longer term funding arrangements in place organisations will be able to plan their services more effectively and work with the Council in designing and delivering services that meet the needs of local residents.

Since 2008 there have been a number of developments that have improved the management and administration of grant funding. Most recently an internal audit report commissioned by the HAVS Scrutiny Challenge Panel made a number of recommendations for improvement. Action has been taken to address these recommendations that led to an improved process for the 2011-12 grant-funding round. Further improvements have been put in place for the 2012-13 funding round including the inclusion of VCS representatives as observers on the grant assessment panels.

2.3.3 Since the adoption of the Third Sector Strategy there have been a number of significant developments that have affected local Third Sector organisations. As well as major changes to the funding landscape, the lack of a CVS service has had an impact on the Sector's access to good quality capacity building support and representation. Despite this, the Council has continued to work with the Voluntary Sector Forum and HSP representatives to achieve good progress against the action plan. In light of the recent approval of the Third Sector Investment Plan, the action plan now requires updating. Appendix 4 provides an updated action plan which the Overview and Scrutiny Committee is requested to consider and comment upon.

2.3.4 The Council is now implementing the Third Sector Investment Plan which sets out a strategic framework for the delivery of Council support to the Third Sector to replace the current Main Grants programme and accommodation offer as follows:

- I. The delivery of commissioning and small projects funding through the Main Grants programme.
- II. A strategic approach to the development of Third Sector accommodation hubs and a review of premises for venue hire.
- III. Alignment of the provision of other support such as discretionary rate relief to the principles of the Third Sector Investment Plan.

2.3.3 Following feedback from the Third Sector and other stakeholders the Council agreed to a phased implementation of these proposals during 2012-13. These are as follows:

I. The Main Grants Programme is being offered using the current processes for the funding period 2012-13. Decisions will be brought to Grants Advisory Panel in February and Cabinet in March 2012 for approval. The process will be conducted as in 2011/12 incorporating the recommendations of the Internal Audit. Assessments will be made by grants panels drawn from officers across the Council. Representatives from the Third Sector will be invited as observers to the panels to further ensure transparency.

II. Pilots for commissioned services for the Main Grants funding will be identified in consultation with the Third Sector at the January workshop and with internal stakeholders early in 2012 and service specifications will be developed in consultation with the Portfolio Holder and other stakeholders. Procurement will be carried out in line with the Council's procurement procedures.

III. A number of projects are underway to support the development of the accommodation offer for the Third Sector in Harrow. These include:

- a) A review of the Discretionary Rate Relief policy. Consultation is currently being conducted with the sector.
- b) The development of community hub bookable space in libraries, children's centres and community halls. This cross-Directorate project will consider where Third Sector organisations can be supported/encouraged to make better use of existing facilities through appropriate hire or licence agreements to be agreed with Corporate Estate and Legal Services. A pilot project has been submitted for consideration for the Transformation Priority Fund.
- c) Potential funding of £60,000 from the Harrow Strategic Partnership (HSP) that has been set aside from the Local Area Agreement reward grant to support accommodation options. Applications were initially received from CARRAMEA (a cooperative of organisations based at the existing Community Premises base in South Harrow) and RAFT which is a cooperative including Mencap, African SANG and others. Both consortia have been invited to resubmit applications which will be considered by the HSP in December 2011.
- d) Harrow Third Sector organisations are part of a West London funding application to the Big Lottery 'Transforming Local Infrastructure Fund' which if successful would also provide funding for the development of a resource centre in the Borough.

Whilst proposals are being developed, organisations based at Community Premises in South Harrow have had their Facilities Use Agreements extended. Projects under consideration include:

- 2.3.5 The community lettings scheme, whereby organisations receive a 50% discount on school bookings made through the Council, has been reviewed several times over the years. Community organisations have been concerned to preserve the Council subsidy for these bookings. Seven schools which transferred to Academy status during the year made a commitment to take direct bookings at the rates currently charged for the first year of bookings. This leaves nine primary schools in the Community Lettings scheme.
- 2.3.6 If the Council retains bookings for certain schools, processes will be revised in order to reduce a potential negative financial impact for the Council. A number of alternative arrangements are under discussion, which could include a consortium approach for schools, and/or placing bookings through an automated booking system to reduce costs. This transition will need to be worked through over the next months with the alternative in place by 2012/13.

## **2.4 Why a change is needed**

- 2.4.1 The Council supports the Third Sector in a number of ways including;
- Directly with funding either in the form of grants or commissioning;
  - Support with accommodation either directly or through the provision of discretionary rate relief;
  - Other support such as fund-raising advice and employee volunteering.

This support is delivered across a number of Council Directorates and the Third Sector Strategy and Investment Plan aim to ensure that there is co-ordination and a strategic overview of how this support is delivered in the future. In the current financial climate however, all Directorates are reviewing the way support is provided to ensure that resources are used in the most cost effective way for the benefit of Harrow residents.

- 2.4.2 The Council commissions a range of services from the Third Sector where the Council recognises that these organisations are better placed to deliver than statutory agencies. Both the Adults and Housing and Children's Services Departments are reviewing their commissioning strategies to ensure they align with future service delivery requirements.
- 2.4.3 There is a high level of demand for grant funding. During the 2011/12 grant funding round the Council received a record number of applications with a total funding request of approximately £2.3 million against a budget of £670,000. The Third Sector will need to change and adapt to meet the challenges of potentially fewer resources and/or commissioning. The Third Sector Strategy and Investment Plan aim to

address these challenges against a continued commitment to build a sustainable and independent Third Sector.

## Implications of the Recommendation

### 2.5 Staffing/workforce

2.5.1 The delivery of the Third Sector Strategy and Investment Plan may have implications for changes to staff roles and responsibilities. These changes will be managed within the Council's policies and procedures including the Protocol for Managing Change.

### 2.6 Legal comments

2.6.1 Decision makers should have due regard to the public sector equality duty. The equalities duties are continuing duties they are not duties to secure a particular outcome. The equalities impact will be revisited on each of the proposals as they are developed. Consideration of the duties should precede the decision. It is important that decision makers have regard to the statutory grounds in the light of all available material such as consultation responses. The statutory grounds of the public sector equality duty are found at section 149 of the Equality Act 2010 and are as follows:

*A public authority must, in the exercise of its functions, have due regard to the need to:*

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;*
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.*

*It is important that when making decisions involving voluntary groups who serve persons with the relevant protected characteristics that a full equalities Impact is completed.*

*The relevant protected characteristics are:*

- *Age*
- *Disability*
- *Gender reassignment*
- *Pregnancy and maternity*
- *Race,*
- *Religion or belief*
- *Sex*
- *Sexual orientation*
- *Marriage and Civil partnership*

## **2.7 Financial Implications**

- 2.7.1 The budget for the delivery of the Main Grants Programme in 2011/12 was £669,360. The proposals contained within this report are based on the assumption that the budget in 2012/13 will remain at the same level however, this level of funding is by no means guaranteed and whether it stays the same, is increased, or decreased, depends on the outcome of the budget and medium term financial planning process.
- 2.7.2 The proposed changes to the delivery of the Main Grants Programme will impact on the way that the budget is distributed between grants and commissioning in future years. Proposed changes will be contained within the overall Main Grants budget or as part of an overall corporate commissioning model.
- 2.7.3 The commissioning of services from the Third Sector will be managed in accordance with EU procurement rules and regulations where applicable.
- 2.7.4 The re-provision of Council support with Third Sector accommodation will be managed within existing budgets or supported through applications for external funding as described above in paragraph 2.3.6.

## **2.8 Performance Issues**

- 2.8.1 The implementation of the Third Sector Strategy and Investment Plan will contribute to the delivery of the Council's corporate priorities. Outcomes for grant funded or commissioned services will be aligned to these priorities and monitored through the annual monitoring process. The results of this monitoring will be used to assess overall performance of funded services and help inform future service specifications.

## **2.9 Environmental Impact**

- 2.9.1 The commissioning of services from the Third Sector will be undertaken using the Council's standard procurement processes. These include a requirement for applicants to demonstrate that they have Environmental Policies in place.
- 2.9.2 The Third Sector Investment Plan supports the Council's commitment to ensure that procurement and supply chain management should be inclusive of the local Third Sector.

## **2.10 Risk Management Implications**

- 2.10.1 The following risks have been identified for the implementation of the Third Sector Strategy and Investment Plan;
- Capacity of the Third Sector to respond to commissioning: This risk will be mitigated by putting in place training and capacity building support to the Third Sector.

- The need to ensure adequate contract management and monitoring systems are in place: This risk will be mitigated by (1) working with the Council's Procurement team to ensure that contract management issues are addressed and (2) continued improvement of monitoring processes across Council directorates.
- Continued heavy demand on the Council's Main Grants Programme: This risk will be mitigated by improving the provision of advice and guidance on other funding opportunities.
- Risk to Council funds where a Third Sector organisation is at risk of financial instability: This risk will be mitigated by undertaking financial checks on organisations prior to the payment of funds and during the mid-year monitoring process.

## **2.11 Equalities implications**

2.11.1 Changes to the way that Council support is delivered to the Third Sector has been based on the results of consultations that have been ongoing since 2009. These consultations include;

- I. Consultation with the Third Sector undertaken during May 2009 to inform changes to the grant application process.
- II. Consultation with the Third Sector to inform the Third Sector Strategy.
- III. Consultation with the Third Sector undertaken during December 2010 - January 2011 to inform the Third Sector Investment Plan.
- IV. Focus group meetings with the VCS, Community Premises user groups, community lettings user groups and schools representatives, during January 2011.
- V. Consultation feedback meetings with VCS representatives, schools representatives, Community Premises user groups, community lettings user groups, during March – May 2011.
- VI. Consultation Workshop with internal stakeholders, in May 2011.
- VII. Consultation Workshop with Third Sector stakeholders, in June 2011.
- VIII. Consultation with members of the Grants Advisory Panel, during June, July and September 2011.
- IX. Internal consultation with senior management group in August 2011.

2.11.2 An equalities impact assessment was undertaken on the Third Sector Investment Plan. This assessment identified that the changes could have both a potential positive and potential negative impact on protected equality groups. The commissioning and grant funding principles contained in the Plan are designed to support the delivery of discretionary services for the Council in accordance with its statutory functions including its equalities duties. The commissioning principles aim to support the delivery of services that;

- tackle disadvantage based on evidence of need;
- prevention services that promote health and well-being;
- advocacy, information / advice and sign-posting service;
- culturally specific services that address the needs of communities
- and infrastructure support services for the Third Sector to support all Third Sector organisations delivering services in Harrow.

The adoption of these principles should enable the Council to secure services that meet the needs of the protected equality groups.

2.11.3 It is recognised however, that the proposals will have an impact on the availability of grant funding for the annual process that has traditionally supported a range of services delivered by Third Sector organisations. With increasing competition for grant funding there is a potential impact on some organisations and services that serve the needs of protected groups.

2.11.4 The decision to introduce the changes to commissioning and small grants using a phased approach aims to mitigate the potential negative impact on groups. A phased implementation will allow Third Sector organisations likely to be affected by the changes more time to prepare for commissioning and more time to put in place alternative fund-raising strategies. The Council will also put in place training and capacity building support to assist organisations during this transition period. The piloting of commissioning in one or two service areas will also allow the Council to test the approach and learn any lessons before full implementation. The Council will continue to review its equalities duties during the development and implementation phases.

## 2.12 Corporate Priorities

2.12.1 This report incorporates the following corporate priorities:

- Keeping neighbourhoods clean, green and safe.
- United and involved communities: A Council that listens and leads.
- Supporting and protecting people who are most in need.

Council support to the Third Sector will be aligned to the delivery of these priorities thereby facilitating closer partnership working between the sectors.

## Section 3 - Statutory Officer Clearance

Name: Kanta Hirani	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 1 December 2011		



Name: Jessica Farmer



on behalf of the  
Monitoring Officer

Date: 30<sup>th</sup> November 2011

#### **Section 4 - Contact Details and Background Papers**

**Contact:** Kashmir Takhar, Head of Service Community Development, 020 8420 9331

**Background Papers:**

None

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# **Harrow Council**

# **Third Sector Strategy**

## **Working Better Together**

**March 2010**

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# Harrow Council Third Sector Strategy

Working Better Together

## Foreword

Harrow Council and Harrow Association of Voluntary Services work with other partners through the Harrow Strategic Partnership. Our aim is to improve Harrow as a place to live; work or study by working together rather than pursuing separate outcomes. Our work is illuminated by our Total Place Initiative, which encourages us to cut bureaucracy and costs and put residents first in joined-up services, which provide what individuals and families need. Harrow Council is transforming itself, through its 'Better Deal For Residents Programme' to be part of a network of provision with partners and this strategy shows how it will re-engage with the Third Sector as a strong, flexible and increasingly important partner.

We are very grateful for the contribution that the Third Sector Project Working Group made to the development of this strategy.

### Vision:

Harrow will have strong community leadership where public services, voluntary groups and businesses work together to improve residents' quality of life and well-being. Harrow's Third Sector will shape, influence and play its part in determining how local services are delivered. Services will be developed on the basis of a shared understanding of priorities and available resources.

## Project Sponsors:

Brendon Hills	–	Harrow Council
Julia Smith	–	Harrow Association of Voluntary Services

## Definition

By the 'Third Sector' we mean

*Not for profit independent, voluntary and community groups or organisations formed by local people, or those with a local interest, to improve the quality of lives for themselves and/or fellow citizens in Harrow. These include registered charities; voluntary organisations; community groups; faith groups involved in social action; community interest companies and; social enterprises.*

## Executive Summary

Over the next three years Harrow Council will lead the transformation of the public sector's relationship with the local Third Sector. We will change the way that we, along with our public sector partners such as NHS Harrow and Harrow Police, work with the Third Sector so that local people get the best possible services and that we make a real difference to their lives. Harrow already has a thriving Third Sector and our joint task is to make it stronger.

The outcome we all seek is to improve the lives of people in the borough.

### Our objectives are to:

#### Deepen Partnerships

- **Strengthen the role of the Third Sector as a strategic partner in shaping Harrow's future;**

#### Build Capacity

- **Supporting the development of the capacity of voluntary and community organisations in the borough so they continue to meet the needs of Harrow's diverse communities. Help the Third Sector to change itself to address the future.**

#### Enable Participation

- **Increase opportunities for Third Sector involvement in design and delivery of public services through a more transparent commissioning process; and improving the management and administration of grant funding;**

In this strategy we set out what the council will do over the next three years so that the Third Sector can build its capability as a service provider, position itself as part of our future plans for co-location and shared services, make better use of resources through more flexible and innovative ways of providing services and activities, and influence how residents respond for example in changing behaviour.

How we share information, have dialogues, learn and transact with the Third Sector is the key to our future as a service provider. Our communications work will build on the links that already exist and promote dialogue between organisations, as well as with the Council and other public services, to support the delivery of this strategy and its ambitions.

## Section 1 Why has Harrow Council developed a Third Sector Strategy?

### Local Context

In 2008 Harrow Council Overview and Scrutiny Committee undertook a Review, 'Delivering a Strengthened Voluntary and Community Sector for Harrow'. This Review involved research, interviews and meetings to uncover the obstacles to there being a strong and vibrant Third Sector in Harrow. This strategy takes forward the recommendations of this review.

The sponsors for the strategy are Harrow Council and Harrow Association of Voluntary Services (HAVS) on behalf of the Harrow Strategic Partnership. There has been wide consultation and research conducted with the Third Sector and other key stakeholders in the preparation of Harrow's Third Sector Strategy.

The Harrow Sustainable Community Strategy sets out the vision for the Borough and the priorities for the Harrow Strategic Partnership over the next 11 years to improve services, maintain environmental, economic and community sustainability, and improve the quality of life for local people. There are six themes, each with a vision, short-term actions and longer-term ambitions that contribute to Harrow's vision for 2020. They are shown in Diagram 1.

The Third Sector has a significant role in delivering the sustainable community strategy and in particular, theme six which focuses on 'the future of public service delivery and democracy in Harrow.

*'Community views will shape and influence public services and everyone will have the opportunity to play their part on how local services are delivered. Harrow will have strong community leadership and public services, voluntary groups and businesses will work together to improve resident's quality of life and well-being. Partners' services will be based on a mutual vision of priorities, finances and resources will be more integrated.'*

The Harrow Strategic Partnership has included National Indicator 7 - An environment for a thriving Third Sector - in its suite of indicators to measure how well it is doing to meet local needs and outcomes. NI 7 will measure the effectiveness of our work with the local Third Sector, and provide important data to enable us to focus our work to ensure that the local Third Sector remains vibrant and able to meet the needs of local communities. Other outcomes will include progress with National Indicators.

Harrow Council will transform the way it delivers services. It is currently reviewing the services it provides and how these can be delivered, either directly by the council, the Third Sector or private sector partners. The Council is developing criteria to help select services that could be provided differently and pilot new operating models for service delivery. The reality of individual clients of Adult Services now each holding their own budget with which to buy services is already impacting on the Council and represents an opportunity for the Third Sector.

These new operating models could include: co-locating services delivered by Harrow Council and NHS Harrow, with Third Sector or private sector organisations; commissioning services to be provided on behalf of the council by another agency (whether public, private or voluntary sector) or by other innovative and creative ways. The Council wants to work with the sector in shaping this agenda.

As part of the transformation programme Public Sector partners have developed a programme of work called Better Together. This workstream involves working better with residents to encourage a cleaner, safer and healthier Harrow. The Third Sector is critical to the success of this programme through championing or delivering activities around civic, engaged and proactive resident.

The Third Sector Strategy will enable council to work with, and support the sector in preparing to take an active part in shaping and contributing to the Transformation Agenda, and in delivering its vision and priorities.

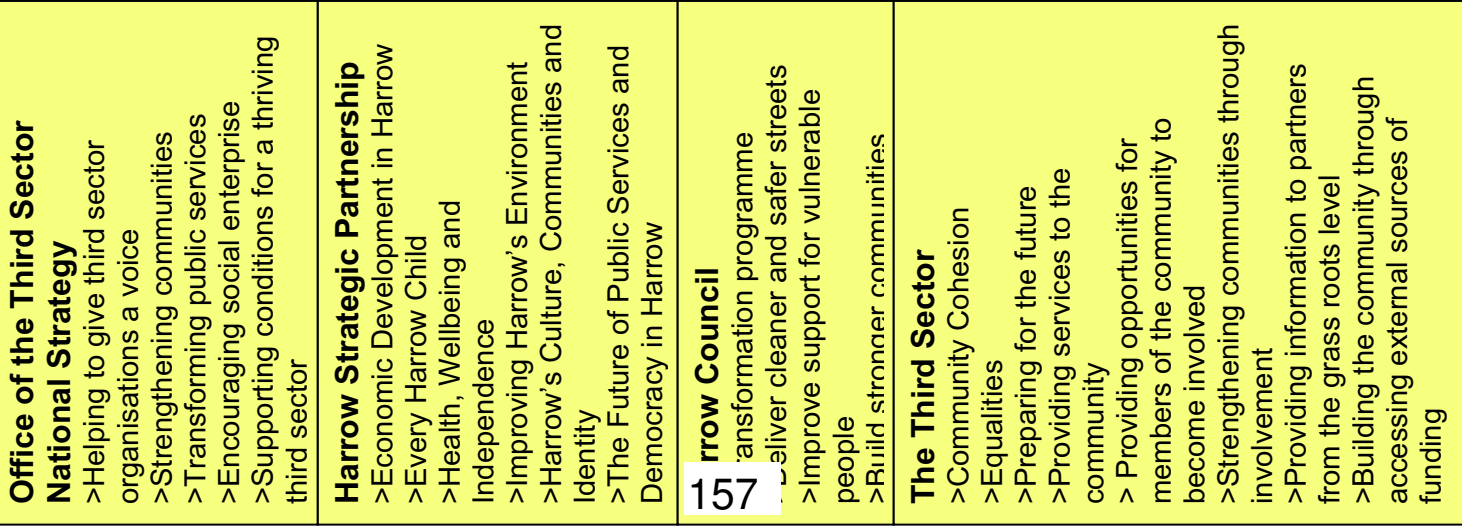
### **National Context**

The National Strategy sets out the measures to be led by the Office of the Third Sector, which will invest more than £515 million in third sector programmes. The main aims are shown in Diagram 1.

### **Provenance**

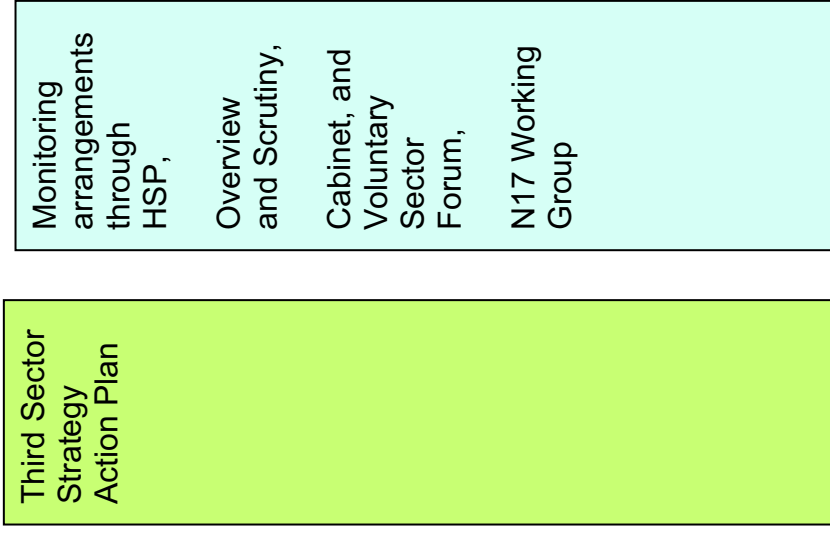
The actions put forward in this strategy have been identified from a research study commissioned from Carole Stewart (SKA8 Consultancy) and in consultation with the Third Sector Strategy Project Working Group.





Harrow Third Sector Strategy

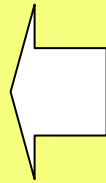
Diagram 1



## Section 2: How will Harrow's Third Sector Strategy work?

By 2020, Harrow will be recognised for:

- Integrated and co-ordinated quality services, many of which focus on preventing problems from arising, especially for vulnerable groups, and all of which put users in control, offering access and choice;
- Environmental, economic and community sustainability, because we actively manage our impact on the environment and have supported inclusive communities which provide the jobs, homes, education, healthcare, transport and other services all citizens need.
- Improving the quality of life, by reducing inequalities, empowering the community voice, promoting respect and being the safest borough in London.



### Deepening Partnership

- Wider involvement of the Third Sector organisations in the HSP
- Build networks for unaffiliated groups
- Develop robust governance framework
- Compact Champion
- Joint Compact Management Board
- 3rd tier officer level Compact Champions
- Compact Peer Review arrangements
- Communications plan and Third Sector web portal

### Building capacity

- Mapping and impact study
- Identify piloting opportunities for innovative service delivery
- HAVS and other strategic partners to lead Third Sector response to strategy
- Establish a Third Sector Leaders Programme
- Review capacity to participate in HSP
- Conduct a feasibility study on commissioning a Third Sector grant-giving body to deliver grants
- Establish HSP Property Network
- Consider the activities of the Third Sector into the Council's review of its property
- Support external funding post
- Establish a new independent equalities body
- Establish a community volunteering delivery group

### Enabling participation

- Establish a Third Sector Commissioning Network
- Adopt a Third Sector Commissioners Check List
- Provide information about upcoming procurement
- Scope action to support social enterprises
- Communicate strategic commissioning priorities
- Training and support for Third Sector organisations
- Facilitate joint bidding and collaborations
- Agree methodology for Full Cost Recovery
- Monitor the action plan and NI 7 indicators and refresh the strategy annually.

## **Section 3: Our Ambitions and Expectations**

### **Ambition 1 – Deepening Partnership – to build trust and renewed confidence for joint working The Third Sector is a strong strategic partner to public services**

#### **1.1 Working as a strategic partner**

##### **Third Sector in Harrow**

There are an estimated 700 to 1300 Third Sector organisations in Harrow. These range from small community groups to larger organisations delivering a range of services and activities to meet the needs of Harrow's communities. Second tier organisations have a key role in engaging with public sector partners to represent the needs of the sector and acting as a communication channel between the public sector and the organisations they represent.

Harrow Association for Voluntary Services (HAVS) is the local council for voluntary service. It is the second tier (infrastructure) organisation that represents the largest number of Third Sector organisations in Harrow. It is a membership organisation with 230 Third Sector organisations signed up as members. HAVS is recognised by the Harrow Strategic Partnership as the lead third sector representative organisation in the borough. There are other second tier, infrastructure organisations providing capacity building services and representation for smaller groups and organisations in the borough. These include Harrow Refugee Forum and the equalities organisation, which will be established in the borough within the next year. In addition to this there are strategic delivery groups that are able to represent the views of specific client groups eg. disability, older people etc.

Harrow Council will work with HAVS and other second tier organisations to ensure that the voices of the smaller voluntary and community groups and organisations in the borough are heard, alongside those of the larger or more established organisations.

The Voluntary Sector Forum provides a platform for the local Third sector to engage with public sector partners. The forum is independent, though affiliated to the Harrow Strategic Partnership. It has the potential to play an important role in developing a more effective network that enables a wider cross section of Third Sector organisations, including arts and sports groups, to engage with public sector partners.

The challenge for the Third Sector and the Voluntary Sector Forum is to work with Harrow Council to deliver the changes needed to achieve the aims of the Harrow Third Sector Strategy.

#### **Action**

1. HAVS, the Voluntary Sector Forum (VSF) and the Council will jointly develop a way of ensuring all groups can have a voice in the HSP.
2. The Council will work with HAVS and the VSF to build appropriate networks for unaffiliated Third Sector Groups to use. These may be on-line rather than meetings-based.

#### **1.2. Bringing the Harrow Compact to life**

The Harrow Compact provides a framework for the behaviours and expectations that govern how we do business together. The Compact sets out responsibilities and undertakings for public sector partners and the third sector. The Compact may need to be strengthened by a robust Governance Framework, which sets out matters such as declarations of interest and other expectations that the Council has of its partners. Within Harrow Council the Director of Community and Environment leads on the delivery of the Third Sector Strategy across the Council and HSP with the Service manager of Policy and Partnership coordinating compact activity across the partnership. The Harrow Compact is underpinned by Compact Codes. These codes give specific guidance on; how partners engage in consultation; addressing equalities needs – specifically people with disabilities and Black and Minority Ethnic Communities, encouraging opportunities for volunteering; and a funding protocol. Work is being undertaken with the Commission for the Compact, NHS Harrow and the Police to publicise the compact among statutory partners.

### **Action**

3. Ensure the Compact contains a robust Governance Framework.
4. Appoint a Compact Champion across the HSP
5. Set up a joint Compact Management Board to lead on embedding the Compact across HSP
6. Designate 3rd tier officer level Compact Champions to lead on Compact issues in each Council Directorate; and initiate discussions with NHS Harrow to embed Compact Champions within its organisation
7. Establish Compact Peer Review arrangements through the West London Alliance.

### **1.3 A better flow of information between the Council and the Third Sector**

Harrow Council and HAVS will develop a communications plan for the Harrow Third Sector Strategy; and improve the general communication channels between the public sector and Third Sector organisations it should include a comprehensive section on the Harrow Council website as a portal to its work with the Third Sector, with links to the HAVS website, which could carry identical information and also act as a portal. Many ethnic minority organisations have cultural and language barriers and need accessible information about the voluntary sector and sources of support.

### **Action**

8. Produce a Communication Plan and establish a Harrow Council Third Sector portal on Harrow Council website and HAVS websites, [www.harrowcvs.org.uk](http://www.harrowcvs.org.uk).

## **Ambition 2 – Build Capacity Building the capacity of the Third Sector – to develop a strong and sustainable sector**

### **2.1 Understanding the Third Sector**

The third sector is strong, flexible and diverse, made up of large and small organisations delivering a wide range of services and activities. There is no consensus on the number of local organisations or what they do. The sector's contribution to the shared priorities of the local strategic partnership is difficult to quantify beyond individual contributions and generalisations on the value of the sector. More information is needed about its strengths, contribution, spread and impact.

Public sector partners are gathering intelligence on what the future might look like, the kind of services that will be needed, and want to find new and innovative ways of delivering these services. If we are to work effectively as partners we need a better understanding of each partner's contribution, capacity and capability. The Council and other commissioners need better information about what services the Third Sector can offer and its current strengths. For example whole larger groups can be commissioned to deliver services via Service Level Agreements, a network of smaller unaffiliated groups could help the 'Better Together' work of changing resident behaviour, and this could be developed as a joint aim. Rather than overall capacity building it may be better to select and focus on a few areas as a pilot.

### **Action**

9. Commission a mapping and impact study to provide benchmark data on the local Third Sector to identify development needs and contributions to wider outcomes.
10. Identify piloting opportunities with Third Sector organisations to deliver services in new and innovative ways.

### **2.2 A strong Harrow Association of Voluntary Services**

The environment in which the third sector is operating will continue to change over the coming years. Public sector partners will be providing services that are more flexible and responsive to the way that people live their lives. More services will be commissioned and innovative partnerships sought to provide services in different ways. The challenge for the Third Sector is to adapt to these changes and reposition itself, without compromising its uniqueness as independent, voluntary and community focused.

HAVS has an important role as the lead organisation representing the Third Sector. The expectation is that HAVS will provide leadership for the local Third Sector in preparing for the many challenges ahead and with, Harrow Council, champion the delivery of the Harrow Third Sector Strategy. HAVS is a strategic second tier infrastructure organisation with many strengths and the Council will support it in fulfilling that role. The Third Sector's aim is to be able to articulate resource and achieve its ambitions.

### **Action**

11. Harrow Council to support HAVS and other strategic partners in leading a third sector response to the council's strategy.

### **2.3 A stronger Harrow Strategic Partnership with Third Sector nominated representatives**

Harrow Council and HAVS will jointly develop a Third Sector Leaders Programme to raise awareness of, the workings of the Harrow Strategic Partnership and public sector agencies; the strategic issues shaping our priorities, and other relevant skills training that would make the Harrow Strategic Partnership more accessible and encourage more Third Sector organisations to participate in the Harrow Strategic Partnership and local decision making. The HSP recognises that third sector organisations may not have the capacity to release staff from their daily responsibilities to participate in the HSP or other public bodies: lack of resources may also act as a deterrent to them taking a more active role.

#### **Action**

12. Harrow Council to support the development of a Third Sector Leaders Programme to support Third Sector organisations, and widen participation in the HSP and other bodies
13. Review the capacity for the Third Sector to participate in the HSP and other bodies

### **2.4 Harrow Grants Programme**

Grants are important for the survival of small voluntary and community organisations whose activities add to the rich diversity of community life in Harrow. Harrow Council will maintain a grants programme that enables third sector organisations to undertake general activities that meet the objectives of the Harrow Sustainable Community Strategy. The Council's grants programme includes a mix of grants and Service Level Agreements (SLAs) to organisations providing a range of services and activities. This year (2009-10), the Council has made the availability of grant aid more widely known, improved access and grants administration and adopted a clear assessment process. However, we need to do more to align grant aid to the aims of the Sustainable Community Strategy. The Council has started and will complete an examination of whether it should deliver grants through an independent body. Preliminary work and research has been undertaken but the issue is very complex so a separate report is planned in the same timeframe as the strategy. A Member-led task group will be established to consider final options on this issue.

#### **Action**

14. Conduct a feasibility study of commissioning an experienced grant giving Third Sector organisation (Trust) to deliver the Harrow Grants Scheme and report the findings with recommendations to Cabinet.

### **2.5 Improving access to premises and external funding premises**

There are three types of property used/occupied by the Third Sector – one is in public ownership and leased to or rented by third sector organisations; the second is owned by third sector organisations and the third is leased or rented from private landlords. The second and third categories are beyond co-ordinated management as they 'belong' in one sense or another to an individual organisation either permanently or for a period. The first category could be managed in a co-ordinated way but the drive behind the property element of the Transformation Programme is to dispose of property, which is or can be made to be surplus to requirements and, at the same time seek the benefits of co-location. The needs of the third sector should be injected into the Transformation Programme and the wider social benefits of third sector activity be balanced against the value of private market disposals. An HSP property network could ensure co-ordinated management of Third Sector property and accommodation issues for instance it could

- Consider Third Sector property and accommodation issues in the forthcoming HSP property review and property strategy
- Produce an online register of (HSP) premises and spaces for hire available to the Third Sector

- Produce an audit of future Third Sector accommodation needs as part of the Third Sector Mapping and Impact Study and use this data to inform the HSP property review and property strategy.

#### **Action**

15. Establish HSP property network to ensure co-ordinated management of Third Sector property and accommodation issues across the Council and other HSP partners.
16. Consider the activities of the Third Sector in the Council's review of its property.

### **2.6 External Funding**

Harrow Council supports the Third Sector in seeking as much external funding as possible to support the delivery of services. However, the Council cannot endorse any and every bid on request but will endorse bids which align with the vision, priorities, policies and objectives of LB Harrow. The Council has established and is helping to finance a funding officer, located within HAVS, to help Third Sector Groups with strategic bids, build bids, winning technique across both sectors and to extend the sector's knowledge of what is available. It plans to continue this support in 2010-11.

#### **Action**

17. Continue to support the post of external funding officer, located in HAVS to support strategic bids and build bid-winning technique.

### **2.7 Equalities**

The Third Sector has many strengths and one of its major strengths is in addressing inequality. Harrow is the ninth most ethnically diverse Borough in the country and the most religiously diverse in the country. Equalities are a fundamental principle that underpins the work of all agencies in Harrow. The Third Sector has a particularly significant role to play in delivering the equalities agenda. There are particular challenges ahead with both the proposed Single Equalities Bill that expands the range of protected groups and increasing local concerns around community cohesion. The council is leading on the development of a new equalities body for the Borough that will reflect the changing national policy context and meet the changing needs of the Borough. It will be important to cut through cultural and language barriers to bring about representation of all the communities in Harrow.

#### **Action**

18. Set up a new independent equalities body for Harrow.

### **2.8 Volunteering**

Harrow is fortunate in having a healthy supply of volunteers. The Overview and Scrutiny committee report confirmed that there is a current over-supply of volunteers and corresponding under-supply of volunteering opportunities to match them to. The potential contribution of volunteers in helping to build the capacity of third sector organisations is immense. The Championing Harrow volunteering legacy is inspired by the London 2012 games and should encourage more groups to come forward with volunteering opportunities.

#### **Action**

19. Establish a Community Volunteering delivery group as part of the Championing Harrow Task Force.

## **Ambition 3 – Enable Participation – to increase the sector’s involvement in service delivery**

### **3.1 Third Sector Commissioning**

Harrow Council along with its partners aspires to provide excellent services through World Class Commissioning from a range of providers, which includes the Third Sector. The characteristics of world class commissioners include; working with community partners; prioritising investment; promoting improvement and innovation; and where necessary, stimulating the local market to provide services that local people need. The Council is aiming to make the changes needed to reach this model way of working, and a checklist would be helpful.

Harrow Council will continue to use their resources to provide local people with excellent services that help individuals and communities achieve better outcomes. Funds will be targeted through strategic commissioning to deliver best value services from a range of providers, locally, regionally and nationally. Commissioning will require provider organisations to demonstrate their ability to deliver cost efficient, quality, value added services and activities for the people of Harrow. The Council will seek to develop its website to promote opportunities for the Third Sector to tender for work with the Council. The Council has a Corporate Procurement Team and an Economic Development Function, which offer help to small businesses. We will bring these functions together in a discussion with HAVS on how this help could be extended to the Third Sector. We will work with the regional and national partners to share information locally and learn from best practice in the field of Third Sector commissioning. The National Programme on Third Sector Commissioning is researching how the Third Sector can evidence its impact on public service delivery by demonstrating value for money and public benefit. We will work jointly with the Harrow Third Sector to understand the new tools and methodologies that provide a framework for evidencing the value of the Third Sector to public service design and delivery. We could usefully give more information about upcoming tenders.

The environment in which the Third Sector is operating will continue to change over the coming years. Public sector partners will be providing services that are more flexible and responsive to the way that people live their lives. More services will be commissioned and innovative partnerships sought to provide services in different ways. The task facing the Third Sector is to adapt to these changes and reposition itself, without compromising its uniqueness as independent, voluntary and community focused. The Council offers support to small businesses and could extend this work to social enterprises.

All services for adult social care will be commissioned through the Adults Joint Commissioning Board. Services for children, young people and families are commissioned through the Children’s Trust. Both the Adults Joint Commissioning Board and the Children’s Trust will formalise the pooling and aligning of budgets, where appropriate, across Harrow Council and NHS Harrow. The Third Sector needs to understand this process in order to be able to bid for work while commissioners need to be aware that social enterprises could be good services providers and ensure they can access the information they need.

The principle at the heart of service provision is ‘personalisation’ providing people with choice so they can access services that meet their individual circumstances and needs. Individual clients now hold their own budgets or receive direct payments to enable them to do this. The Local Area Agreement for Harrow expects that at least 35% of clients (or their carers) will hold personal budgets or receive direct payments by March 2011. The Council, working with the Mental Health Trust is currently on track to achieve this.



## Action

20. We will establish a Third Sector Commissioning Network to provide professional development and training opportunities for public sector commissioners and the local Third Sector. Cross sector training will enable us to improve our technical skills and expertise; grow respect and understanding across sectors and; strengthen the capacity of the local Third Sector to compete in the new environment.
21. We will adopt a Third Sector checklist to prompt and aid commissioners to include the local third sector when designing services, developing specifications and throughout the commissioning process.
22. Provide information about upcoming procurement to improve planning and co-ordination across commissioners and inform the Third Sector of opportunities.
23. Corporate Procurement, Economic Development, Harrow in Business and HAVS to scope action to support social enterprises.
24. Public sector partners will, in liaison with HAVS, ensure that the strategic priorities for commissioning services are communicated to the local Third Sector and that there is, as far as possible, a consistent application process for commissioning across public sector partners.

## Developing the local market

The local third sector will review and decide how it might need to change in order to take advantage of these opportunities and be more competitive in this new climate. This could mean working more closely with other organisations in Harrow, in neighbouring boroughs or nationally by:

- sharing resources (staff, assets, premises etc) under formal agreements;
- working as a federation with other similar organisations whilst remaining legally independent;
- working in consortia for bids and tender opportunities;
- merging with another organisation where there is 'organisational' and/or 'charitable' fit.

A training and development programme could be helpful to improve skills in bidding for work tendered and technical skills in business planning and costing, including Full Cost Recovery.

The Harrow Consortium of voluntary organisations was formed to enable local Third Sector organisations and small groups to bid for medium to large scale contracts to provide services. The Consortium is supported by HAVS. Though unsuccessful in its first joint bid, it has the potential to develop in to an effective vehicle for smaller organisations to access public sector contracts.

## Action

25. Work with HAVS to scope and commission appropriate training.
26. Strengthen Harrow Consortium of voluntary organisations to facilitate joint bidding and collaborations by the local Third Sector.

## **Full Cost Recovery**

The HSP accepts that no activity or service can be undertaken without its provider incurring some cost in providing that service. Full Cost Recovery means that it is legitimate for third sector organisations to include a proportion of their overheads (core administration costs) when bidding to provide services or activities. This is normal commercial practice.

Applying full cost recovery is complex and requires the Third Sector to cost their services using methods that can be scrutinised and challenged where necessary.

## **Action**

27. Harrow Council and NHS Harrow will work with the local third sector towards a common understanding locally on an agreed methodology for calculating Full Cost Recovery.

## Section 4 Action Plan

Programme Area	Lead	Timeframe from start of Implementation	Resources
<b>Ambition 1 – Deepening Partnership</b>			
1. HAVS, the Voluntary Sector Forum (VSF) and the Council will jointly develop a way of ensuring all groups can have a voice in the HSP.	Divisional Director of Community & Culture	To be developed through scoping exercise	Realign existing resources
2. The Council will work with HAVS and the VSF to build appropriate networks for unaffiliated Third Sector Groups to use. These may be on-line rather than meetings-based.	Community Development (Head of Service)	To be developed through scoping exercise	Existing resources
3. Ensure the Compact contains a robust Governance Framework	Policy & Partnerships (Service Manager)	3 months	Existing resources
4. Appoint a Compact Champion across the HSP	Policy & Partnerships (Service Manager)	3 months	Realign existing resources
5. Set up a joint Compact Management Board to lead on embedding the Compact across HSP	Policy & Partnerships (Service Manager)	3 months	Realign existing resources
6. Designate 3rd tier officer level Compact Champions to lead on Compact issues in each Council Directorate; and initiate discussions with NHS Harrow to embed Compact Champions within its organisation	Policy & Partnerships (Service Manager)	3 months	Realign existing resources
7. Establish Compact Peer Review arrangements through the West London Alliance	Policy & Partnerships (Service Manager)	Within 3 months	Realign existing resources
8. Produce a Communications Plan and establish a Harrow Council Third Sector portal on the Harrow Council website and HAVS website.	Community Development (Head of Service)	3 months	To be costed
<b>Ambition 2 Building the capacity of the Third Sector</b>			

<b>Programme Area</b>	<b>Lead</b>	<b>Timeframe from start of Implementation</b>	<b>Resources</b>
9. Commission a mapping and impact study to provide benchmark data on the local Third Sector to identify development needs and contributions to wider outcomes.	HAVS Chief Executive / Head of Community Development	Update HSP Board within 3 months	To be costed
10. Identify piloting opportunities with Third Sector organisations to deliver services in new and innovative ways.	Head of Community Development / HAVS / VSF	Within 6 months	Realign existing resources
11. Harrow Council to support HAVS and other strategic partners in leading a third sector response to the council's strategy.	HAVS Chief Executive / Head of Community Development	Update board by 31.01.10	Realign existing resources
12. Harrow Council to support the development of a Third Sector Leaders Programme to support Third Sector organisations, and widen participation in the HSP and other bodies.	HAVS Chief Executive / Head of Community Development	Update board by 31.01.10	To be costed
13. Review the capacity for the Third Sector to participate in the HSP and other bodies.	HAVS Chief Executive / HSP representatives	To be developed through scoping exercise	Realign existing resources
14. Conduct a feasibility study of commissioning an experienced grant giving Third Sector organisation (Trust) to deliver the Harrow Grants Scheme and report the findings with recommendations to Cabinet.	Head of Community Development	Parallel exercise	To be costed
15. Establish HSP property network to ensure co-ordinated management of Third Sector property and accommodation issues across the Council and other HSP partners.	Corporate Director Place Shaping	Update board by 31.01.10	Realign existing resources
16. Consider the activities of the Third Sector into the Council's review of its property.	Corporate Director Place Shaping	Immediate	Realign existing resources
17. Continue to support the post of external funding officer located in HAVS to support strategic bids and build bid – winning technique.	Head of Community Development	Budget March 2010	Existing resources
18. Establish a new independent equalities body.	Head of Community Development	April 2010	Existing resources
19. Establish a Community Volunteering delivery group as part of the Championing Harrow Task Force.	Head of Community Development	April 2010	Realignment of existing resources

Programme Area	Lead	Timeframe from start of Implementation	Resources
<b>Ambition 3 – Enabling Participation</b>			
20. Establish a Third Sector Commissioning Network to provide professional development and training opportunities for public sector commissioners and the local Third Sector quarterly.	Head of Community Development / Service Manager Procurement	3 months	To be costed
21. Adopt a Third Sector Check List to prompt and aid commissioners to include the local third sector when designing services, developing specifications and throughout the commissioning process.	Head of Community Development	6 months	Realign existing resources
22. Provide information about upcoming procurement to improve planning and co-ordination across commissioners and inform the Third Sector of opportunities.	Head of Community Development	6 months	Realign existing resources
23. Corporate Procurement, Economic Development, Harrow in Business and HAVS to scope action to support social enterprises.	Head of Economic Development / Service Manager Procurement / Harrow in Business and HAVS Chief Executive	3 months	Realign existing resources
24. Public sector partners will, in liaison with HAVS, ensure that the strategic priorities for commissioning services are communicated to the local Third Sector and that there is, as far as possible, a consistent application process for commissioning across public sector partners.	HSP Partners	Within 3 months	Realign existing resources
25. Work with HAVS to scope and commission appropriate training eg in bidding for tendered work.	HAVS Chief Executive / Head of Community Development	Update HSP Board within 3 months	Realign existing resources
26. Strengthen the Harrow Consortium of voluntary organisations to facilitate joint bidding and collaborations by the local Third Sector.	HAVS Chief Executive / Head of Community Development	Within 6 months	Realign existing resources

Programme Area	Lead	Timeframe from start of Implementation	Resources
27. Harrow Council and NHS Harrow will work with the local third sector towards a common understanding locally on an agreed methodology for calculating Full Cost Recovery.	Head of Community Development	Within 6 months	Existing resources
28. Monitor the action plan and NI 7 indicators, report to Overview & Scrutiny, HSP, Cabinet and Voluntary Sector Forum and refresh the strategy annually.	Divisional Director Community & Culture	Annual review plus interim reports to Overview & scrutiny / cabinet via the Portfolio Holder	Realign existing resources

## Section 5 – Implementation and Monitoring

Much of the action plan is for initiation in 2010-11 and once this is underway a further scan is needed of action into the future. An annual refresh and the introduction of stretch targets will assist. Monitoring will mainly capture tracking the action plan and establishing the suite of indicators composing National Indicator 7 ‘An environment for a thriving Third Sector’. The annual monitoring report should be received by

- HSP
- Overview & Scrutiny Committee
- Cabinet
- Voluntary Sector Forum

And they should all report into the annual refresh of the strategy.

If the strategy develops successfully as a partnership tool, the outcome should be that people’s lives improve, problems will be identified earlier and responses will be prompter.

Implementing the Third Sector Strategy should impact favourably on a number of National Indicators, not just NI 7. For example there should be a positive outcome in relation to:

- NI 6 Participation in regular volunteering
- NI 141 Vulnerable people achieving independent living.
- NI 136 People supported to live independently - Third sector activity feeds directly into this Indicator which measures the number of people who have been assisted to remain living in their own homes as a result of either Council-commissioned services following an assessment, or through groups funded by the Council via grants.

There is also the potential for third sector groups to impact on several of the National Indicators around Health & Wellbeing. For example;

- NI 119. Self-reported measure of people’s overall health and wellbeing
- NI 120. All-age all cause mortality rate
- NI 121. Mortality rate from all circulatory diseases at ages under 75
- NI 122. Mortality rate from all cancers at ages under 75
- NI 124. People with a long-term condition supported to be independent and in control of their condition
- NI 129. End of life care –access to appropriate care enabling people to be able to die at home
- NI 137. Healthy life expectancy at age 65
- NI 138. Satisfaction of people over 65 with both home and neighbourhood
- NI 139. The extent to which older people receive the support they need to live independently at home

### Action

28. Monitor the action plan and NI 7 indicators, through the N17 working group report to Overview and Scrutiny, HSP, Cabinet and Voluntary Sector Forum and refresh the strategy annually.



Appendix 2

**Harrow Council**

**Third Sector Investment Plan**

**2012 - 2015**

## **1. Introduction**

- 1.1 This plan sets out a strategic approach to delivering Council support to the Third Sector. Using the definition adopted by the Third Sector Strategy<sup>1</sup> this sector is defined as:

Not for profit, independent, voluntary and community groups or organisations formed by local people, or those with a local interest, to improve the quality of lives for themselves and/or fellow citizens in Harrow. These include registered charities; voluntary organisations; community groups; faith groups involved in social action; community interest companies and social enterprises.

- 1.2 The aim of this plan is to ensure that the Council makes the best use of its resources by aligning these with the delivery of its corporate priorities and statutory duties. The Council wishes to support the development of an independent and sustainable Third Sector that delivers outcomes for local residents alongside statutory agencies. This plan therefore sets out a delivery framework for;

- I. Commissioning and Small Projects funding through the Main Grants programme.
- II. The development of Third Sector accommodation hubs.
- III. Aligning the provision of discretionary rate relief to commissioning.

- 1.3 The proposals contained within this plan are based on the results of consultation undertaken with the Third Sector, Council departments and Members during 2009, 2010 and 2011. The proposals are also based on an analysis of current Council support of the Third Sector and consideration of relevant Council plans and strategies.

## **2. Background**

### **2.1 Third Sector Strategy**

The Third Sector Strategy seeks to strengthen the relationship between the Third Sector and the Council. It has three objectives;

- (i) To deepen partnership working by strengthening the role of the Third Sector as a strategic partner;
- (ii) To build the capacity of the Third Sector to help it change itself to address the future;
- (iii) To enable participation by increasing opportunities for Third Sector involvement in the design and delivery of public services through a more

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<sup>1</sup> Third Sector Strategy, April 2010

transparent commissioning process and improving the management and administration of grant funding.

## 2.2 Voluntary Sector Compact

The Harrow Compact sets out agreed shared principles and commitments between the statutory and Third Sectors. The aims of the Compact are to build on existing partnerships and develop the relationship between the sectors through mutual respect and trust so that they can together provide more effective services to local people and communities within the borough. The shared principles set out in the Compact include working in partnership to enhance the ability of public sector bodies and Third Sector organisations to fulfil their own purposes whilst also imposing responsibility for each sector to contribute towards mutual aims and objectives.

## 2.3 Overview and Scrutiny review: Delivering a strengthened voluntary and community sector

The Overview and Scrutiny report 'Delivering a strengthened voluntary and community sector' made a number of recommendations to support the strengthening of the relationship between the Council, partners and the Third Sector. It also recognised the pressure on the Council and partners to deliver services that are responsive to local needs.

## 3. Key Principles

3.1 The Third Sector Investment plan proposes a set of key principles to under-pin decisions around resource allocation to the Third Sector. These principles have been derived from the results of consultation which indicate strong support for ensuring that Council resources are allocated for the benefit of people living, working or schooling in Harrow. The consultation results also showed strong support for a focus on using resources to support preventative services and for ensuring that services provide value for money in the delivery of outcomes. The key principles for this plan are;

- Resources will be allocated to organisations that operate on a not-for-profit basis only.
- Resources will be allocated where they are used for the benefit of people living, working or schooling in Harrow.
- Resources will be allocated where they help the Council deliver its priorities.

- The allocation of resources will be matched to the delivery of specified outcomes.
- Resources will be allocated where they achieve good value for money and deliver measurable added value.
- Resources will be allocated where they provide benefit to the protected equality groups under the Equalities Act 2010 and further the Council's public sector duty on equalities.

These key principles will underpin the future delivery of Council support to the Third Sector through commissioning, grant funding and premises support.

#### **4. Commissioning**

- 4.1 The Council commissions a range of services from the Third Sector where the Council recognises that these organisations are better placed to deliver these than statutory agencies. Both the Adults and Housing and Children's Services directorates have been commissioning services for a number of years and both are currently updating their commissioning strategies (current commissioning priorities are attached at Appendix 2).
- 4.2 Current commissioning priorities in Adults and Housing and Children's Services are informed by the Joint Strategic Needs Assessment and are aligned to the delivery of the Council's statutory duties. The Council is developing an overall commissioning model for services and Third Sector investment will be part of this development.
- 4.3 In January 2011 the Council consulted with the Third Sector on the future provision of support through the Council's Main Grants programme, community lettings and Community Premises. The results of this consultation indicated that 86% of respondents felt that commissioning was an effective way of securing some services.
- 4.4 The Main Grants Programme is currently structured as an annual, competitive grant funding scheme. This means that some services that could be commissioned are competing for funding alongside a range of smaller or one-off projects. In recent years the demand on this programme has been very high and this is expected to continue. Through commissioning these services could be removed from the annual process and instead be resourced more appropriately to deliver agreed outcomes. The commissioning of services will be undertaken through a formal tendering process and services will be commissioned against detailed service specifications funded on a three-year basis.

## 5. **Commissioning priorities for the Main Grants Programme**

5.1 The commissioning priorities for the Main Grants Programme have been developed in consultation with the Third Sector and Council Directorates. The priorities aim to fill the gaps in services not currently commissioned by other Directorates. The priorities are;

- Services that support the delivery of the Council's statutory functions
- Services that tackle disadvantage based on evidence of need
- Prevention services that promote health and well-being
- Advocacy, information / advice and sign-posting services
- Culturally specific services that address the needs of communities
- Infrastructure support services for the Third Sector

### 5.3 Training support to assist Third Sector organisations participate in commissioning

A survey of Third Sector training needs has been undertaken to identify the support needed. This survey indicated a high demand for training support, particularly in the area of preparing and submitting a tender. In response to this the Council is developing a package of training support that will include on-line information, training workshops and telephone support.

## 6. **Small Projects grant funding**

6.1 In addition to the commissioning of services a proportion of the grants budget will be set aside to support a Small Projects grant funding programme. This will be delivered as an annual, competitive application process and will offer small grants of up to £5,000 per annum. The scheme will be aimed at supporting smaller Third Sector organisations with an annual income of up to £50,000.

### 6.2 Application process

Following feedback from Third Sector representatives and others the application form, guidance notes and assessment scoring process have been improved. Information sessions on the new application process will be provided including guidance on use of the electronic application form.

### 6.3 Assessment process

Applications will be assessed against the following criteria:

- Evidence of need for the proposed project.
- Plans for addressing this need.
- How the project tackles disadvantage, fosters good relations and promotes equality of opportunity.
- How projects will deliver proposed outcomes
- How people can get involved and access the project.
- How the project will give added value such as through using volunteers and working collaboratively with others.
- Clear and realistic costs for the project.
- Exit strategy beyond the life of the funding.

6.4 A scoring sheet will be used as in previous years. The assessment process will be undertaken by a panel of assessors that will include two Council officers and one Third Sector representative elected via the Voluntary and Community Sector Forum.

6.5 A meeting of panel Chairs will take place both at the beginning and at intervals during the assessment process. A mediation meeting and random sample testing will take place at the end of the process. Quality assurance checks will be carried out throughout the process.

#### 6.6 Appeals process

The results of the consultation indicated mixed views on retaining the appeals process. Most other funding bodies do not have an appeals process. It is the view of the Grants Advisory Panel however, that an appeals process should be retained for the short term until the new process has been established.

The grounds for appeal will continue to be; *information presented to the Grants Advisory Panel was incorrect or information was omitted and that this had a material effect on the decision*

As agreed in 2011 appeals will be considered before final grant awards are confirmed to successful applicants. Appeals will be considered by an independent panel consisting of the Divisional Director Community and Culture, Portfolio Holder Community and Culture and an Independent Adviser.

### 7. **Accommodation support**

7.1 The future provision of accommodation support to the Third Sector will be developed in line with the key principles of this Plan.

7.2 The current process for the allocation of support across the Council is ad hoc with some organisations benefitting as a result of historical patronage. The allocation process should be based on a strategic view of resources and aligned to the achievement of the Council's corporate priorities and statutory duties.

7.3 Allocation policies should be considered alongside the provision of grants and other funding. The cost of providing premises support is significant and those receiving it should therefore be subject to the same level of expectation to deliver against agreed outcomes as those receiving direct financial support.

7.4 The results of the consultation indicated strong support across the Third Sector that organisations should:

- Contribute to the cost of provision
- That 'larger' organisations should support smaller ones with access to premises
- That there should be alternative provision possibly run by organisations themselves, such as a resource centre, or drop-in venue
- That organisations should be able to book venues directly with schools rather than the Council operating as an intermediary

There was also support for the provision of a directory of venues for hire and concessionary rates on certain Council venues.

7.5 Based on the results of this consultation the Council will support the development of Third Sector hubs that offer opportunities for shared costs, community management and flexible use. A number of hub locations will be identified that could offer a range of facilities for the community and Third Sector organisations that include;

- Office space
- Hot desking space
- Shared meeting / training space
- Shared activity space
- Postage / internet / IT facilities

7.6 Discretionary rate relief

The Council provides support with business rates to non-profit making organisations by either topping up relief to charities, in addition to the amount of mandatory relief that may be given (up to 100% of the rate charge) or by granting relief of up to 100% to non-profit making bodies where the property is "used by one or more institutions or organisations,

none of which is established or conducted for profit and whose main objects are charitable, philanthropic or religious or concerned with education, social welfare, science, literature or the fine arts.”

The Council currently provides different levels of discretionary and non-discretionary rate relief to Third Sector organisations in Harrow. The future provision of rate relief will be reviewed in line with the key principles set out in this plan.

## **8. Monitoring**

8.1 In 2010 the Community and Environment and Adults and Housing directorates introduced a process of joint monitoring for organisations receiving above £10,000 of Council funding. This process will be further enhanced for 2011/12 and will involve all directorates.

Improvements to this process will include;

- A simplified monitoring form that is pre-populated with information provided by the applicant.
- Standardisation of SLAs across the Council.
- Identification of monitoring officers and training prior to monitoring visits
- Development of a library of essential documents

8.2 The development of a library of essential documents has been started and the aim is to ensure that the Council holds one set of documents for each organisation funded or supported by it (irrespective of which directorate is providing the support). The expectation is that policy documents, except for Health and Safety, should be updated every three years (Health and Safety policies should be updated every year). Organisations will be responsible for ensuring that their policy documents are updated in line with any changes in legislation, Codes of Practice, regulations etc. and updated documents should be sent to the Council. Specialist officers from across the Council will provide support to monitoring officers to quality check documents received from Third Sector organisations.

## **9. Other forms of support**

### **9.1 Other support**

The Council provides support to the Third Sector in a number of other ways including:

- *External funding advice:* The External Funding Manager provides advice and guidance to Third Sector organisations on potential funding sources



and general support with bid writing. The External Funding Manager has facilitated strategic links with funding bodies such as the Heritage Lottery Fund that has resulted in Harrow being identified as a priority borough. This type of joint working will be further developed in the future.

- *Access to procurement contracts:* The Council's procurement service has piloted a scheme to give Third Sector organisations access to Council procurement contracts such as stationery, enabling them to benefit from favourable terms for the purchase of stationery items. There is scope to develop this pilot in partnership with the Third Sector going forward.
- *One-4-One employee volunteering scheme and Harrow's Heroes:* The Council supports its employees to participate in volunteering by matching hour for hour, the time an employee gives to volunteer in the local community, up to a limit of 36 hours a year. The scheme has successfully registered 40 local organisations and placed 60 employees in to volunteering opportunities. The Council also promotes volunteering through it's annual Harrow's Heroes event, that celebrates and recognises the contribution of volunteers in the community.

## **Appendix 1**

### Adults and Housing commissioning priorities

#### Principles for future funding

1. Direct correlation to Adult's commissioning priorities (set out below)
2. Social care emphasis rather than health focused projects
3. Offering value for money
4. Move from core funding small number of organisations to full cost recovery – Service Delivery focus
5. Service delivery rather than consultation focused services
6. Reduce duplication of services

### Adults commissioning priorities

- Prevention services including social and practical related tasks
- Advocacy, information/advice and sign-posting services
- Culturally specific services needed by new communities
- Carers breaks
- Employment for people with Learning disabilities and people with mental health issues

**Children's Services Priorities** (replaces Strategic Commissioning Focus 11/12)

1. **Early Intervention** - intervening early in the onset of difficulties to meet additional needs at the earliest point and preventing the escalation of need for more complex and costly interventions.
2. **Health Prevention** - improving physical and mental well-being of children & young people and educating them to make healthy lifestyle choices.
3. **Safeguarding** - making safeguarding every one's business and ensuring those most vulnerable to abuse are identified and intervention provided to ensure their safety.
4. **Narrowing the Gap** - between outcomes for the more vulnerable and disadvantaged groups of young people and the general child population.



Programme Area	Lead	Timescale	Update	Priority
<b>Ambition 1 – Deepening Partnership</b>				
1	HAVS, the Voluntary Sector Forum (VSF) and the Council will jointly develop a way of ensuring all groups can have a voice in the HSP.	Divisional Director of Community & Culture + 5 VCS representatives	Dec-10	M
2	The Council will work with HAVS and the VSF to build appropriate networks for unaffiliated Third Sector Groups to use. These may be on-line rather than meetings-based.	Community Development (Head of Service) + VCS reps	Sep-10	M
3	Ensure the Compact contains a robust Governance Framework	Policy & Partnerships (Service Manager)	Jun-11	H
4	Appoint a Compact Champion across the HSP	Policy & Partnerships (Service Manager)	Sep-10	H
5	Set up a joint Compact Management Board to lead on embedding the Compact across HSP	Policy & Partnerships (Service Manager)	Mar-11	H
6	Designate 3rd tier officer level Compact Champions to lead on Compact issues in each Council Directorate; and initiate discussions with NHS Harrow to embed Compact Champions within its organisation	Policy & Partnerships (Service Manager)	Mar-11	H
7	Establish Compact Peer Review arrangements through the West London Alliance or partner Borough	Policy & Partnerships (Service Manager)	Feb-11	M
			The HSP restructure was completed in October 2011. This included a streamlining of Third Sector representation however, the VCS Forum continues to meet and annually elects 5 representatives for the HSP. Regular quarterly meetings take place between these representatives, the Chief Executive and the Council Leader. As part of the interim CVS arrangements the Council has commissioned Ealing CVS to undertake some development work with the Forum to increase its membership and attendance.	
			The Compact was updated in 2009. The final code to be updated is the Funding and Procurement Code. Consultation has been undertaken with the Third Sector, internal stakeholders and the Grants Advisory Panel. This Code will be presented to the Corporate Strategy Board in February 2012. This will include consideration of the appointment of Directorate-wide Compact Champions and development of a joint Compact Board. The draft code has received positive feedback from the national organisation, Compact Voice.	

8	Produce a Communications Plan and establish a Harrow Council Third Sector portal on the Harrow Council website and HAVS website.	Community Development (Head of Service)	Mar-11	A number of measures have been undertaken to improve both internal officer communication on issues affecting the Third Sector as well as the Council's external communications with the Third Sector, these include; The reinstatement of the Third Sector Strategy Working group which will include Third Sector representation from January 2012; The development of Council web pages relating to this year's grant application process and regular meetings with Third Sector representatives on a range of issues.	M
<b>Ambition 2: Building the capacity of the Third Sector</b>					
9	Commission a mapping and impact study to provide benchmark data on the local Third Sector to identify development needs and contributions to wider outcomes.	HAVS Chief Executive / Head of Community Development	Jun-11	Work has been undertaken to update the database of Third Sector organisations. A survey of development needs will be undertaken by Ealing CVS on behalf of the Interim CVS Board. This survey will inform the development of a service specification for a new CVS service.	H
10	Identify piloting opportunities with Third Sector organisations to deliver services in new and innovative ways.	Head of Community Development / HAVS / VSF	Jun-11	The Adults & Housing Directorate have delivered Market Development seminars to help organisations develop services that respond to the Personalisation Agenda. Funding applications have been submitted and are awaiting approval, to develop pilot projects to deliver shared back office and accommodation support.	M
11	Harrow Council to support HAVS and other strategic partners in leading a third sector response to the council's strategy.	HAVS Chief Executive / Head of Community Development	Dec-10	As above (no. 1) the Council has continued to work with and receive feedback from Third Sector representatives through the quarterly meetings with the Chief Executive and the Council Leader. Membership of the Third Sector Strategy working group will be expanded to include Third Sector representation in January 2012. A consultation workshop is planned for January 2012 that will launch the refresh of the Third Sector Strategy.	M

12	Harrow Council to support the development of a Third Sector Leaders Programme to support Third Sector organisations, and widen participation in the HSP and other bodies.	HAVS Chief Executive / Head of Community Development	Dec-10	The HSP funded a six-month Trustee Development Project in 2010. This supported a number of organisations with Governance and Trustee training. The External Funding Network expanded its remit to include capacity building support and has received a number of presentations from organisations that offer leadership support eg. Pilotlight, Cranfield Trust.	M
13	Review the capacity for the Third Sector to participate in the HSP and other bodies.	HSP Voluntary sector representatives	Dec-10	The Council has continued to open up opportunities for Third Sector participation on a number of bodies including for example, Adults and Housing consultation steering group; Membership of the Corporate Equalities Task Group; Interim CVS Board etc. It is also exploring potential involvement in this year's grant assessment panels.	M
14	Conduct a feasibility study of commissioning an experienced grant giving Third Sector organisation (Trust) to deliver the Harrow Grants Scheme and report the findings with recommendations to Cabinet.	Head of Community Development	Mar-11	A consultation was undertaken with the Third Sector during December 210-January 2011. The consultation sought views on which organisation should manage the delivery of the grants programme. 62% stated support for Harrow Council continuing to manage the programme. There was little support for the management to be undertaken by any other body: 11% said Voluntary or Community Sector agency; 18% said Community Trust; 10% said Other.	M
15	Establish HSP property network to ensure co-ordinated management of Third Sector property and accommodation issues across the Council and other HSP partners.	Corporate Director Place Shaping	Dec-10	The Third Sector Strategy review group provides co-ordination of all issues affecting the Third Sector including accommodation. Within this remit the group has considered the Council's future policy on discretionary rate relief and potential Third Sector use of Council buildings such as libraries, Children's Centres and community centres. This group will provide regular reports to the HSP.	H
16	Consider the activities of the Third Sector into the Council's review of its property.	Corporate Director Place Shaping	Sep-10		H

17	Continue to support the post of external funding officer located in HAVS to support strategic bids and build bid – winning technique.	Head of Community Development	Review September 2010	As part of the new interim CVS support arrangements, Third Sector organisations are able to access fundraising support and advice from Hammersmith & Fulham CVS (CaVSA). Ealing CVS are also providing 2 workshops in the New Year; Developing a Fundraising strategy and Writing High Quality Funding Bids. The Council's External Funding Manager continues to operate an External Funding Network and circulates a regular funding newsletter.	M
18	Establish a new independent equalities body.	Head of Community Development	Sep-10	The new Equalities Body (Harrow Equalities Centre - HEC), has been operational since November 2010. The Centre has provided training on the new Equality Act 2010 and works strategically with the Council through its membership of the Corporate Equalities Task Group.	M
19	Establish a Community Volunteering delivery group as part of the Championing Harrow Task Force.	Head of Community Development	Sep-10	The refreshed Championing Harrow Action Plan includes actions to promote volunteering. This includes ensuring links to national programmes such as Sports Makers and creating local volunteering opportunities.	M
20	<b>Ambition 3 – Enabling Participation</b> Establish a Third Sector Commissioning Network to provide professional development and training opportunities for public sector commissioners and the local Third Sector quarterly.	Head of Community Development / Service Manager Procurement	Dec-10	The Council adopted its Sustainable Procurement Strategy in October 2011. This strategy aims to achieve improvements in social, economic and environmental sustainability through its procurement practices. The "procurement" pages of the Harrow Council website have been updated to provide the most up-to-date sources of information for the Third Sector and SMEs on how to improve their capacity to sell to the public sector. A "Sustainable Procurement Checklist" includes prompts for consideration of local Third Sector (and SMEs) throughout the commissioning and procurement cycle. The Third Sector Investment Plan establishes key commissioning principles which have been developed in consultation with the Third Sector and internal commissioning Directorates. Both Adults and Housing and Children's Services are currently reviewing their commissioning strategies and procurement processes. A standard Service Level Agreement is now in place and used by	M
21	Adopt a Third Sector Check List to prompt and aid commissioners to include the local third sector when designing services, developing specifications and throughout the commissioning process.	Head of Community Development	Dec-10		H
22	Provide information about upcoming procurement to improve planning and coordination across commissioners and inform the Third Sector of opportunities.	Head of Community Development	Sep-10		H



24	Public sector partners will, in liaison with HAVS, ensure that the strategic priorities for commissioning services are communicated to the local Third Sector and that there is, as far as possible, a consistent application process for commissioning across public sector partners.	HSP Partners	Sep-10	M	all funding Directorates. Joint Monitoring arrangements have also been developed across Children's, Adults and Housing and Community Environment to standardise and streamline processes
23	Corporate Procurement, Economic Development, Harrow in Business and HAVS to scope action to support social enterprises.	Head of Economic Development / Service Manager / Procurement / Harrow in Business and HAVS Chief	Dec-10	H	The survey being undertaken by the Interim CVS Board will assess Third Sector support needs to develop social enterprises. Harrow is also part of a West London funding application, which if successful will provide funding to provide support for social enterprises.
25	Work with HAVS to scope and commission appropriate training eg in bidding for tendered work.	HAVS Chief Executive / Head of Community Development	Sep-10	M	Harrow Council undertook a survey of training needs in June 2011. The new interim CVS service will also be undertaking a survey of development needs during December 2011-January 2012. Ealing CVS will be providing a training workshop on How to Tender and Manage Contracts in March 2012.
26	Strengthen the Harrow Consortium of voluntary organisations to facilitate joint bidding and collaborations by the local Third Sector.	HAVS Chief Executive / Head of Community Development	Sep-10	H	During 2011 there has been an increase in joint bids and collaborations amongst Third Sector organisations. For example; Two funding applications received by the HSP for the development of Third Sector accommodation were received by two consortium groups, CARRAMEA and RAFT. Third Sector organisations have also collaborated on the joint West London funding application to the Big Lottery Transforming Local Infrastructure fund. The interim CVS service is being delivered by a consortium of three CVSs.
27	Harrow Council and NHS Harrow will work with the local third sector towards a common understanding locally on an agreed methodology for calculating Full Cost Recovery.	Head of Community Development	Dec-10	M	The Funding and Procurement Code is currently being updated to reflect changes in the Council's funding arrangements. The Council will continue to work towards a common understanding of full cost recovery as part of the commissioning model to be developed during 2012.

28	Monitor the action plan, report to Overview & Scrutiny, HSP and Voluntary Sector Forum and refresh the strategy annually.	Divisional Director Community & Culture	Mar-11	The action plan is monitored by the Third Sector Strategy working group. Third Sector representatives will be invited to join this group in 2012 to provide reports back to the VCS forum. An update report has been provided to Overview and Scrutiny in December 2011. The annual review for 2012 will commence during a consultation workshop to be held in January.	M
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DRAFT ACTION PLAN PRIORITIES

Programme Area	Lead	Timescale	Update	RAG status	Priority
<b>Ambition 1 – Deepening Partnership</b>					
1 Undertake development work with the Voluntary Sector Forum to enable it to become a more effective and representative body.	Head of Community Development / VCS reps / Ealing CVS	Mar-12			M
2 Finalise Funding and Procurement Code in consultation with the VCS and internal stakeholders.	Policy & Partnerships (Service Manager)	Mar-12			H
3 Strengthen Compact Governance arrangements including setting up a Compact Management Board	Policy & Partnerships (Service Manager)	Jun-12			H

DRAFT ACTION PLAN PRIORITIES

Programme Area	Lead	Timescale	Update	RAG status	Priority
4 Appoint Compact Champions in each Council Directorate.	Divisional Director Community & Culture/ Policy & Partnerships (Service Manager)	Mar-12			H
5 Establish Compact Peer Review arrangements through the West London Alliance or partner Borough	Policy & Partnerships (Service Manager)	Mar-12			M
6 Deliver Compact awareness training to Officers, Members and VCS	Policy & Partnerships (Service Manager)	Dec-12			H

DRAFT ACTION PLAN PRIORITIES

Programme Area	Lead	Timescale	Update	RAG status	Priority
Further develop the One-4-One employee volunteering scheme to provide a range of Council volunteers to Third Sector organisations.	Head of Community Development	Dec-12			M

DRAFT ACTION PLAN PRIORITIES

Programme Area	Lead	Timescale	Update	RAG status	Priority
<b>Ambition 2</b>					
<b>Building the capacity of the Third Sector</b>					
8 Undertake consultation with the Third Sector on development needs to be addressed by a new CVS service.	VCS Representatives / Head of Community Development	Jan-12			H
9 Secure a new CVS service that provides relevant support for Third Sector organisations that prepares them to respond to future opportunities	Divisional Director Community & Culture	Jul-12			H
10 Develop and deliver workshops and on-line training to support organisations during transition to commissioning and small grants .	Head of Community Development / Ealing CVS / Sustainable Procurement Lead	Jul-12			H
11 Develop a range of accommodation options including atleast one Third Sector accommodation hub.	Divisional Director Community & Culture	Dec-12			H
12 Explore the feasibility of community management of premises and potential asset transfers.	Head of Community Development / Head of Corporate Estates	Dec-12			M
13 Identify and respond to funding opportunities to provide support for social enterprises.	Head of Economic Development / Sustainable Procurement Lead	Dec-12			H

DRAFT ACTION PLAN PRIORITIES

Programme Area	Lead	Timescale	Update	RAG status	Priority
13 Further develop the Council's joint monitoring processes so that they support organisational development.	Head of Community Development / A&H / Children's Services Commissioning Lead	Dec-12			M

DRAFT ACTION PLAN PRIORITIES

Programme Area	Lead	Timescale	Update	RAG status	Priority
<b>Ambition 3 – Enabling Participation</b>					
14 Develop and pilot a commissioning model for securing services from local Third Sector organisations.	Head of Community Development / Sustainable Procurement Lead	Jul-12			H



DRAFT ACTION PLAN PRIORITIES

Programme Area	Lead	Timescale	Update	RAG status	Priority
15 Develop an accessible Small Grants programme for 2013/12.	Divisional Director Community & Culture	Dec-12			M
16 Increase Third Sector involvement in decision-making processes including for example, grant assessment panels.	Head of Community Development	Dec-12			M
17 Improve planning and co-ordination across commissioners so that the Third Sector is notified of upcoming opportunities.	Head of Community Development/ Children's Services Commissioning Lead / Service Manager A & H	Sep-12			H
197 Encourage the development of consortias across the Third Sector.	Head of Community Development / H & F CVS / VSF	Dec-12			M

DRAFT ACTION PLAN PRIORITIES

Programme Area	Lead	Timescale	Update	RAG status	Priority
19 Harrow Council and NHS Harrow will work with the local third sector towards a common understanding of full cost recovery and implications for the Council and Voluntary sector of moving in this direction.	Head of Community Development / VCS reps / A & H / Children's sErVICES / NHS Harrow	Dec-10			M
20 Produce a Communications Plan and develop a Third Sector information page on the Harrow Council website.	Head of Community Development / Comms	Mar-12			H
21 Monitor the action plan; provide update reports to Overview & Scrutiny, HSP and the Voluntary Sector Forum; and refresh the strategy annually.	Divisional Director Community & Culture	Dec-12			M
198 VSF (Voluntary Sector Forum); VCS (Voluntary and Community Sector); CVS (Council for Voluntary Service); HSP (Harrow Strategic Partnership); H & F CVS (Hammersmith & Fulham CVS)					