

# **West London Waste Plan**

**Amended DRAFT Proposed Submission Version**

13 December 2013

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

## Executive Summary

1. For some time, both the European and UK Governments have been concerned that we are sending too much of our waste for disposal – not enough is being recycled and re-used.
2. Consequently, every local authority must produce a plan detailing how it will deal with waste generated in its area over the next 15 years. These plans make up a part of the authority's Local Plan and show which factors they will take into account when deciding on whether to grant planning permissions for new waste management facilities.
3. In West London, six London boroughs have agreed to co-operate to produce a single waste plan for their combined area. When adopted, this plan will form part of each of their respective Local Plans.
4. Preparation of the West London Waste Plan involves a number of stages and so far these have included evidence gathering, technical assessment and public consultation. It is proposed that this version of the Plan is that which will be submitted to Government for testing its 'soundness' and legality. Prior to its submission, this Plan has been published to allow for representations to be made on its soundness and legality.
5. 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 has been allocated an amount of London's waste that it is required to positively plan for managing, which includes ensuring that sufficient sites are identified to meet the apportioned targets. By each borough meeting its apportionment, London will dramatically reduce its reliance on landfill and move towards being self-sufficient.
6. This proposed submission version of the West London Waste Plan:
  - details the estimated amounts for the different types of waste that will be produced in West London up to 2031;
  - identifies and protects the current sites to help deal with that waste;
  - identifies the shortfall of facilities needed over the life of the Plan; and
  - proposes a set of sites to meet the shortfall which are to be safeguarded.
7. This Plan has been prepared with the objective of ensuring consistency with national Government policy and general conformity with the London Plan (2011).

8. The report comprises seven sections, covering:
- i. An introduction to the West London Waste Plan;
  - ii. The Vision and Objectives of the Plan;
  - iii. How waste is managed at present;
  - iv. An explanation of what will be needed in the future to manage waste;
  - v. Details of the sites identified for future waste facilities;
  - vi. Policies to guide the determination of planning applications for new waste facilities; and
  - vii. A short explanation of how the Plan will be monitored in future.
9. The existing sites and additional sites proposed for inclusion in the Plan are set out in the tables below:

*Table i: Existing waste sites proposed for allocation*

Site Number	Name	Site Area (ha)	Borough
352	Twyford Waste Transfer Station	1.46	Brent
1261	Veolia Transfer Station, Marsh Road	2.71	Brent
309*	Greenford Reuse & Recycling Site	1.78	Ealing
310*	Greenford Depot, Greenford Road		
328#	Quattro, Victoria Road, Park Royal	0.94	Ealing
331	Rigby Lane Waste Transfer Station	0.88	Hillingdon
342	Twickenham Depot	2.67	Richmond
<b>Total</b>		<b>10.44</b>	

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

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

*Table ii: Additional sites identified for waste management uses*

<b>Site Number</b>	<b>Name</b>	<b>Site Area (ha)</b>	<b>Borough</b>
222	Council Depot, Forward Drive	1.83	Harrow
2861	Western International Market	3.20	Hounslow
<b>Total</b>		<b>5.03</b>	

**Combined Total Area = 15.47 hectares**

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# Contents

<b>Executive Summary</b> .....	<b>i</b>
<b>Contents</b> .....	<b>iv</b>
<b>Figures &amp; Tables</b> .....	<b>vi</b>
<b>Maps of Allocated Sites</b> .....	<b>vii</b>
<b>1 The West London Waste Plan</b> .....	<b>1</b>
1.1 Preparation of the Plan .....	1
1.2 Why is the West London Waste Plan Needed? .....	2
1.3 Relationship with Other Planning Strategies and the Plan's Status .....	3
1.4 Sustainability Appraisal and Other Assessments .....	7
1.5 Community and Stakeholder Consultation .....	8
1.6 Commenting on the Plan.....	8
1.7 Planning applications for waste management facilities.....	11
1.8 West London Waste Authority.....	11
<b>2 Vision and Objectives of the Plan</b> .....	<b>13</b>
2.1 Vision.....	13
2.2 Strategic Objectives .....	13
<b>3 Existing Waste Management</b> .....	<b>14</b>
3.1 Existing Waste Management.....	14
3.2 Municipal Solid Waste.....	14
3.3 Commercial and Industrial Waste.....	16
3.4 Construction, Demolition and Excavation Waste .....	16
3.5 Hazardous Wastes.....	17
3.6 Wastewater and Sewage sludge.....	18
3.7 Agricultural Waste.....	18
3.8 Radioactive Waste .....	18
3.9 Cross boundary Movement of Waste .....	19
3.10 Role of Landfill in the Management of Residual Waste .....	21
<b>4 Future Waste Management</b> .....	<b>23</b>
4.1 How much waste will need to be managed in West London? .....	23
4.2 How much capacity is needed?.....	24
4.3 What kind of facilities will be needed? .....	28
4.4 Construction, Demolition and Excavation Wastes .....	28
4.5 Hazardous Wastes.....	29
<b>5 The Sites</b> .....	<b>30</b>
<b>6 West London Waste Plan Policies</b> .....	<b>37</b>
6.1 Policy WLWP 1 – Safeguarding and Protection of Existing and Allocated Waste Sites.....	37
6.2 Policy WLWP 2 – Location of Waste Development .....	38
6.3 Policy WLWP 3 – Ensuring High Quality Development .....	39
6.4 Policy WLWP 4 – Decentralised Energy.....	41
6.5 Policy WLWP 5 – Sustainable Site Waste Management .....	42

6.6	Policy WLWP 6 – National Planning Policy Framework: Presumption in Favour of Sustainable Development .....	43
<b>7</b>	<b>Monitoring of the West London Waste Plan.....</b>	<b>44</b>
7.1	Monitoring Mechanisms and Proposed Indicators.....	44
7.2	Review of the West London Waste Plan.....	46
<b>8</b>	<b>Glossary .....</b>	<b>47</b>
<b>9</b>	<b>Appendices.....</b>	<b>56</b>
	<b>Appendix 1: Existing Waste Sites in West London .....</b>	<b>57</b>
	<b>Appendix 2: Supporting Assessments .....</b>	<b>61</b>
	<b>Appendix 3: General Waste Treatment Facility Descriptions .....</b>	<b>62</b>
	<b>Appendix 4: Borough Waste Arisings and Apportionments .....</b>	<b>63</b>

DRAFT

## Figures & Tables

Figure 1-1: The West London Waste Plan Area .....	1
Figure 1-2: The West London Waste Plan Area context.....	2
Figure 1-3: The Waste Hierarchy.....	4
Figure 3-1: West London Waste Authority MSW management route (2008 – 2012).....	15
Figure 3-2: Destination of hazardous waste arisings from West London (2012).....	17
Figure 3-3: Exports of waste out of West London by management type.....	20
Figure 3-4: Where West London sent waste in 2012 by fate & WPA.....	21
Figure 4-1: Forecast Arisings and Capacity Apportionment for West London Boroughs from the London Plan (2011).....	24
Figure 4-2: Projected Capacity Gap between London Plan (2011) Apportionment and Existing Capacity.....	25
Figure 4-3: Interim Capacity Gap between Existing Capacity and Arisings as forecast by the London Plan (2011).....	27
Figure 5-1: Location Plan showing all proposed sites.....	30
Table 1-1: Recycling/composting/reuse targets set in the London Plan (2011) .....	2
Table 1-2: Timetable for the development of the West London Waste Plan .....	3
Table 3-1: West London Waste Authority management of MSW (2011-2012).....	15
Table 3-2: Management of CD&E waste in West London.....	17
Table 3-3: Principal Flows of Waste out of West London 2012.....	19
Table 3-4: Waste sent to Landfill from West London in 2012, by receiving site type.....	22
Table 4-1: Quantity of MSW and C&I waste forecast to be produced in West London & the apportionment figures from the London Plan (2011) for target years ...	23
Table 4-2: West London Capacity Requirements for Target Years based on the London Plan (2011) .....	26
Table 5-1: Existing waste sites considered to have potential for redevelopment.....	30
Table 5-2: Additional sites with opportunity for developing waste facilities.....	35
Table 7-1: Monitoring programme for the West London Waste Plan .....	45

## Maps of Allocated Sites

<b>Site 352</b> Twyford Waste Transfer Station, Abbey Road, Brent.....	32
<b>Site 1261</b> Veolia Transfer Station, Marsh Road, Alperton.....	32
<b>Site 309</b> Greenford Reuse and Recycling Site & <b>Site 310</b> Greenford Depot, Greenford Road, Greenford, Ealing.....	33
<b>Site 328</b> Quattro, Victoria Road, Park Royal, Ealing.....	33
<b>Site 331</b> Rigby Lane Waste Transfer Station, Hayes, Hillingdon.....	34
<b>Site 342</b> Twickenham Depot, Langhorn Drive, Twickenham, Richmond.....	34
<b>Site 222</b> Council Depot, Forward Drive, Harrow.....	35
<b>Site 2861</b> Western International Market, Hayes Road, Southall, Hounslow.....	36

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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. How the West London Waste Plan area sites within its wider regional context is also illustrated at Figure 1-2.

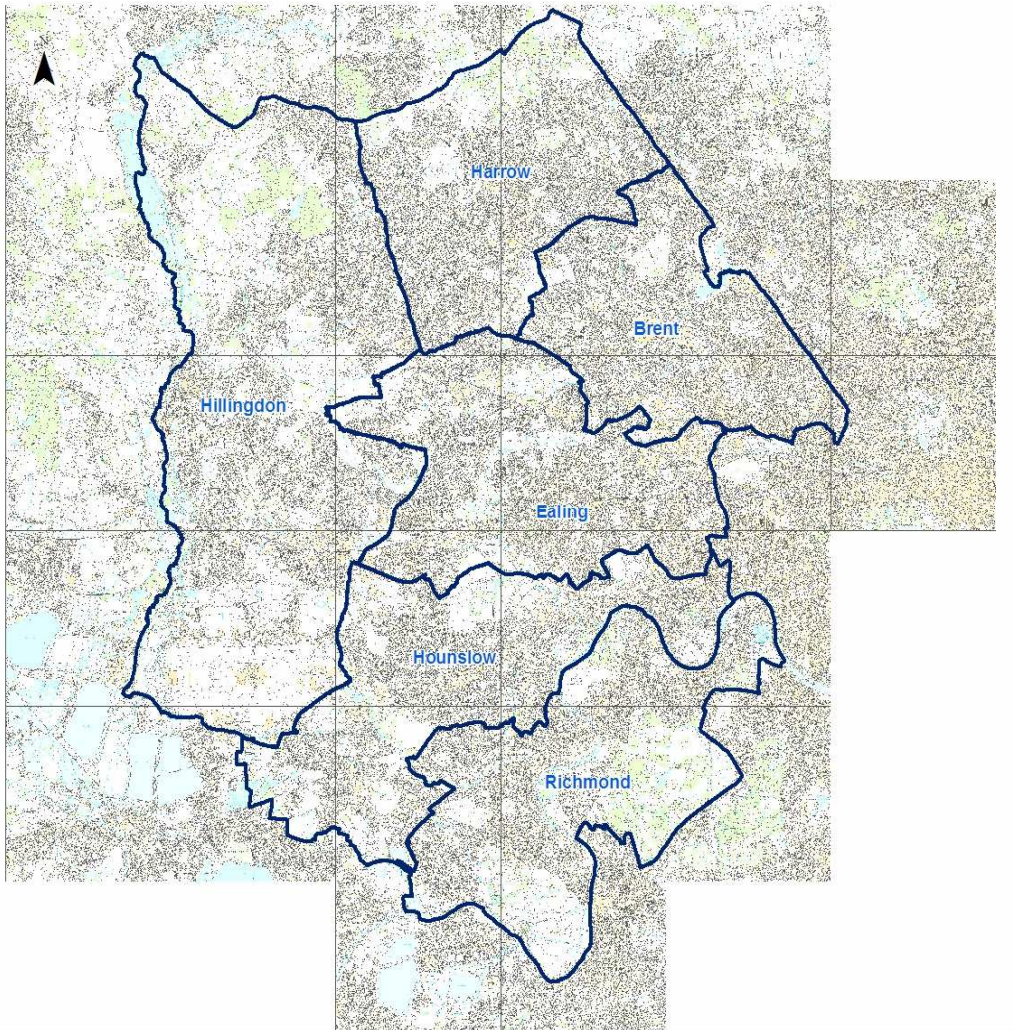


Figure 1-1: The West London Waste Plan Area



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

1.2 Why Is The West London Waste Plan Needed?

1.2.1 The West London Waste Plan (the Plan) will provide a planning framework for the management of all waste produced in the six boroughs over the next 15 years. The boroughs are required by Government to prepare local planning policy for waste management which needs to be in general conformity with the Mayor’s London Plan (2011)<sup>1</sup>. The London Plan (2011) is the Mayor of London’s planning strategy for the capital that sets out targets for recycling and composting for waste from households, businesses and industry (See Table 1-1 below).

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

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

Source: London Plan (2011)

<sup>1</sup>See <http://www.london.gov.uk/priorities/planning/london-plan>

- 1.2.2 A significant amount of waste is transferred outside of London for treatment or disposal. The London Plan (2011) aims to ensure that as much of London's waste is managed within London as practicable working towards managing the equivalent of 100% of London's waste within London by 2031.
- 1.2.3 The West London Waste Plan will form part of the Development Plan for each of the boroughs. The Development Plan comprises a number of development planning documents and must contain both specific policies for waste and sites identified for waste management. These planning documents must be in general conformity with the London Plan (2011), in addition to national planning policy. Before the Plan can be adopted it has to be independently tested through a public examination to ensure it meets all of the key tests for a 'sound' plan.
- 1.2.4 This Proposed Submission Plan identifies the proposed sites for waste management development in the plan area and provides policies with which waste developments must conform. This Plan reflects the London Plan (2011) apportionment targets providing management of waste from households, business and industry in the Plan area up to 2031. The timetable for the production of the Plan and for its final adoption is shown in Table 1-2.

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

<b>Period</b>	<b>Stage of development</b>
January - March 2009	Issues and Options Consultation
February - March 2011	Proposed Sites and Policies Consultation
March - April 2014	Proposed Submission Draft Consultation
May 2014	Submission to the Secretary of State c/o Planning Inspectorate
Summer 2014	Public Examination
Spring 2015	Adoption by the West London boroughs

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

- 1.3.1 The Plan is influenced by, and has to give consideration to, relevant European, national, regional and local policy in relation to waste development (both adopted and emerging).
- 1.3.2 Subject to the Plan being found sound and legally compliant, the Plan will be adopted by each of the constituent boroughs. It will then take on the status of a statutory Local Development 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. Prior to its adoption, it will be a material consideration but accorded limited weight in decision making.



**European Legislation**

1.3.3 The revised Waste Framework Directive [2008/98/EC]<sup>2</sup>, which has been implemented by The Waste (England and Wales) (Amended) Regulations 2012<sup>3</sup>, is the over-arching European Union (EU) legislation for waste. The directive requires member states to take appropriate measures to encourage firstly, the prevention or reduction of waste and its harmfulness and secondly, the recovery of value from waste by means of recycling, re-use or reclamation or any other process with a view to extracting secondary raw materials, or the use of waste as a source of energy. This management scheme is called the waste hierarchy (see Figure 1-3), and the objective is to manage waste as near to the top of the hierarchy as possible with safe disposal of waste as a last resort. The Directive also requires Member states to prepare a national waste plan.

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

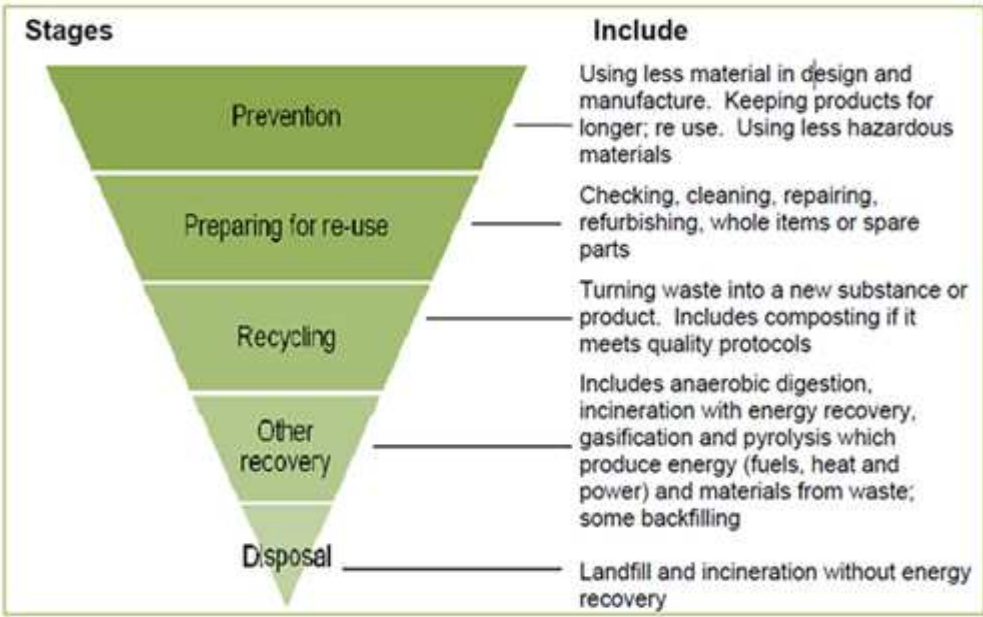


Figure 1-3 The Waste Hierarchy

**National Policy**

1.3.5 The planning system, as well as the waste management industry has undergone significant changes over the past few years. The National Planning Policy Framework (March 2012) sets out the national policy approach to ensuring sustainable development.

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<sup>2</sup> Waste Framework Directive (Directive 2008/98/EC): <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:312:0003:0030:en:PDF>

<sup>3</sup> See: <http://www.legislation.gov.uk/ukxi/2012/1889/made>

### **Planning Policy Statement 10**

- 1.3.6 Planning Policy Statement 10: Planning for Sustainable Waste Management<sup>4</sup> sets out national objectives and guidance to be considered when producing planning policies for waste development and consideration of applications for waste development. The Government intends to update this policy.

### **Government Review of Waste Management Policy**

- 1.3.7 The Government Review of Waste Management Policy in England 2011<sup>5</sup> was published following a comprehensive review of The Waste Strategy for England 2007. The key objectives of these documents are to:

- Separate 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 set national targets for recycling and composting of household waste and the recovery of municipal waste.

- 1.3.8 To meet the requirement of the Waste Framework Directive for a national waste plan, the Government has recently published an updated waste strategy for England in the form of a National Waste Management Plan along with a separate National Waste Prevention Plan. Production of local waste plans is also intended to contribute towards meeting this requirement.

### **Localism Act 2011 and the Duty to Co-operate**

- 1.3.9 The Localism Act 2011 provides for the abolition of all Regional Spatial Strategies (RSSs), except the London Plan (2011) which is retained in the capital. The RSSs apportioned quantities of waste to be managed in each sub-regional area which generally corresponded to a Waste Planning Authority (WPA) area. WPAs outside London are no longer required to be in conformity with the now abolished RSSs or meet waste management apportionments for London. In the South East and East of England, this included provision for landfill of some residual waste from London.

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<sup>4</sup> *Planning Policy Statement 10, revised March 2011 -*  
<http://www.communities.gov.uk/documents/planningandbuilding/pdf/1876202.pdf>

<sup>5</sup> *Government Review of Waste Management for England 2011 -*  
<http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf>

This means that some counties that previously considered West London's residual waste management needs when planning landfill capacity are no longer doing so. Clearly this has a significant implication for the management of waste from London boroughs where waste is exported to be managed outside the London area. The London Plan (2011) expects London boroughs to plan for 100% net self sufficiency in waste management by 2031, whilst recognising that there is likely to be ongoing management of waste arising in London outside of the capital, albeit in decreasing amounts.

1.3.10 The Localism Act 2011 introduced the 'Duty to Co-operate' requiring local planning authorities (and other public bodies) to co-operate in relation to the planning of sustainable development. All public bodies have a duty to co-operate on planning issues that have cross administrative boundary impacts, particularly those relating to the strategic priorities<sup>6</sup> set out in the NPPF, such as the provision of infrastructure for waste management and wastewater. In carrying out their duty, the Act expects bodies to "engage constructively, actively and on an ongoing basis". In the case of West London there are several cross boundary movements of waste which need to be considered as follows:

- Management of residual waste
- Management of hazardous waste

1.3.11 The extent of these movements is detailed in Section 3. In considering this, the West London boroughs have engaged formally with the Environment Agency as well as relevant WPAs. Initial contact was made with all WPAs currently accepting waste from the Plan area, and those who export waste to the Plan area. Emails, meetings and telephone conversations were used to exchange and confirm information on waste flows between the two areas and to agree significant cross boundary issues regarding the waste flows, future requirements and other, related matters. Attendance at meetings of regional groupings of Waste Planning Authorities such as the London Regional Technical Advisory Board (RTAB) and the South East Waste Planning Advisory Group (SEWPAG) have provided further opportunities to discuss cross boundary issues.

1.3.12 Published and emerging waste planning documents of the counties and regions concerned were also consulted to assess current and projected capacities and policies regarding accepting waste from West London in the future.

1.3.13 Throughout the Plan process there has been ongoing engagement with other WPAs, although not necessarily agreement on all matters.

1.3.14 Further details of how the West London boroughs have engaged with bodies to meet

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<sup>6</sup> *National Planning Policy Framework 2012, paragraph 156*

the Duty to Co-operate requirements are contained in a separate Duty to Co-operate Schedule.

### **Regional Policy**

- 1.3.15 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 Spatial Strategies (RSS) for other parts of England have been revoked, the London Plan (2011) will continue to provide strategic guidance for the capital and thus be accorded significant weight in guiding the formulation of development plans and in determining planning applications.
- 1.3.16 This Plan must be in general conformity with the policies in the London Plan (2011) and in particular those regarding waste management. As mentioned above, this includes an apportionment of the tonnages of municipal and commercial and industrial waste to be managed by each London borough; revised targets for recycling of municipal waste; and new targets for recycling of commercial and industrial waste and recycling or reuse of construction and demolition waste and diversion of waste from landfill (see Table 1-1).
- 1.3.17 Implementation of the policies in this Plan will ensure that the boroughs contribute towards the London Plan (2011) aim of 100% waste net self-sufficiency by 2031.

### **Local Policy**

- 1.3.18 Each borough must produce a Local Plan which replaces what was previously called the Local Development Framework or Unitary Development Plan. The Local Plan is a collection of local development documents that include policies, strategies and plans such as this Plan.
- 1.3.19 This Plan is being prepared jointly by the six West London boroughs, and must be aligned with their individual Local Plans and help deliver their Community Strategy as well as be in general conformity with the regional strategy set out in the London Plan (2011).

## **1.4 Sustainability Appraisal and Other Assessments**

- 1.4.1 The Plan has been subjected to a Sustainability Appraisal (SA) during the course of its development. An SA appraises whether planning documents accord with the principles outlined in the Government's UK Sustainable Development agenda<sup>7</sup> and implement the EU Strategic Environmental Assessment Directive. The SA aims to ensure that sustainability considerations are taken into account early in the process of policy development.

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<sup>7</sup> See DEFRA: <http://sd.defra.gov.uk/what/>

- 1.4.2 A Habitats Regulations Assessment (HRA); an Equalities Impact Assessment (EqIA) and a Strategic Flood Risk Assessment (SFRA) have also been undertaken as part of the development of this Plan. Appendix 2 provides details on the processes followed for each of these assessments.

## **1.5 Community and Stakeholder Consultation**

- 1.5.1 The West London Waste Plan has been informed by consultation with statutory bodies, local organisations, key stakeholders and the wider community throughout its preparation. This has been carried out in accordance with each borough's "Statement of Community Involvement". Initial consultation took place in January and February 2009 on the key issues which the West London Waste Plan needs to address, as set out in the West London Waste Plan Issues and Options report<sup>8</sup>. A wide range of responses was received at various public workshops and meetings held across the six boroughs, and by written representations.
- 1.5.2 The boroughs' preferred approach to deal with the issues raised, as well as a list of the proposed sites, was published for comment in February 2011 in the Proposed Sites and Policies report<sup>9</sup>. Staffed drop-in sessions in each of the six boroughs were attended by over 120 people, with 64 people attending further meetings. In addition to responses received at these events, 248 questionnaires were completed, and a further 133 additional written and email submissions were made. Two petitions containing 2,399 signatures were also submitted. A summary report on this consultation is available on the West London Waste Plan website ([www.wlwp.net](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 {insert date TBC}
- 1.6.2 All representations made will be considered by a Planning Inspector at a formal examination. The purpose of the examination is to consider whether the Waste Plan complies with the legal and procedural requirements and is 'sound'.
- 1.6.3 Since the Planning Inspector's purpose is to answer these questions, any comments on this Plan will need to be related to legal compliance and "soundness", as set out in the National Planning Policy Framework, 2012 (NPPF). This includes being prepared in accordance with the Duty to Co-operate.
- 1.6.4 In summary, comments on the "soundness" of this Plan need to address the following issues:

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<sup>8</sup> *West London Waste Plan Issues and Options Report (February 2009) available to download from <http://www.wlwp.net/documents.html>*

<sup>9</sup> *Proposed Sites and Policies Report (February 2011) available to download from <http://www.wlwp.net/documents.html>*



- Is it 'positively prepared'? This means that the document must be:
  - based on a strategy which seeks to meet objectively assessed development and infrastructure requirements
  - seeking to meet unmet requirements from neighbouring authorities where it is reasonable to do so
  - consistent with achieving sustainable development.
- 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
  - able to demonstrate how the social, environmental, economic and resource use objectives of sustainability will be achieved.
- Is it 'effective'? This means that the document must be:
  - deliverable over its period
  - based on effective joint working on cross boundary strategic priorities
  - 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? This means the document must be:
  - able to deliver sustainable development
  - able to specify how decisions are to be made against the sustainability criterion.

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>10</sup> and in the National Planning Policy Framework, 2011<sup>11</sup> which outlines the requirements for Local Plans and Planning Policy Statement 10 which provides specific guidance for planning for sustainable waste management.

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<sup>10</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>11</sup> See: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/11443/1876202.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/11443/1876202.pdf)

1.6.6 All responses must be received by [insert date]. All representations and other material in support of any comments made should be sent to:

**Project Manager West London Waste Plan  
Planning Policy Team  
3N/02 Civic Centre  
High Street, Uxbridge, Middlesex, UB8 1UW**

**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)**

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 boroughs will seek to ensure that all reports are accessible to everyone and will offer assistance to those who are blind or partially sighted or do not speak English fluently.

1.6.10 It is currently anticipated that the representations made on the West London Waste Plan Proposed Submission document will be submitted to the Secretary of State, along with associated documents including underpinning evidence, in May 2014. The Secretary of State will then appoint a Planning Inspector to hold an independent examination of the Plan. This examination may include public hearings and the Inspector may decide to hold a pre-hearing meeting at which they will set out the programme for the examination and discuss any administrative or procedural issues.

1.6.11 The current timetable anticipates the examination will commence during the summer of 2014.

1.6.12 In the event that the Inspector reports that the Plan is sound and legally compliant (possibly subject to modifications), the boroughs may then adopt the Plan. It is envisaged that this will take place during the spring of 2015.

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

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

- Any national statutory guidance, including planning policy on waste management;
- Borough Local Development Documents;
- London Plan, 2011 and any subsequent revision;
- Mayor of London Order (2008); and
- Supplementary Planning Guidance from the Mayor or relevant Supplementary Planning Documents from the boroughs.

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

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

## **1.8 West London Waste Authority**

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

- 1.8.2 The WLWA and its constituent boroughs consulted on and subsequently adopted a Joint Municipal Waste Management Strategy<sup>12</sup> in 2005. The strategy sets out the future waste and recycling plans and targets for the Authority and each of the six boroughs to 2020. This was updated in 2009.
- 1.8.3 The WLWA Strategy has a vision of achieving a 70% reuse/recycling/recovery rate and zero waste to landfill although there is no timescale for these targets.

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<sup>12</sup> See: WLWA Draft Joint Municipal Waste Management Strategy, September 2005 - <http://westlondonwaste.gov.uk/about-us/waste-strategy/>

## 2 Vision and Objectives of the Plan

### 2.1 Vision

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

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

#### West London Waste Plan Vision

By 2031, 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 underpin the achievement of the vision and were developed in response to the key issues for West London and responses received through community consultation.

#### West London Waste Plan Strategic Objectives

1. To identify sufficient land for the management of the six boroughs' pooled waste apportionment as set out in the London Plan (2011), including safeguarding existing waste sites and maximising their use as waste management sites.
2. To ensure that waste is managed as far up the waste hierarchy as possible, by encouraging the minimisation of waste and the use of waste as a resource.
3. To reduce the impact of waste management on climate change by encouraging the use of sustainable transport and new, clean technologies, whilst seeking to locate waste management facilities as close to waste sources as practicable.
4. To ensure that, through appropriate policies, waste facilities meet the highest standards possible of design, construction and operation to minimise adverse effects on local communities and the environment.
5. To support the key aims and objectives of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond's Sustainable Community Strategies.

## 3 Existing Waste Management

### 3.1 Existing Waste Management

3.1.1 West London produces, and is expected to continue to produce, a significant quantity of waste. This section looks at the different types of waste being generated in West London and how it is currently being managed, along with future trends allowing for the West London boroughs to determine what policies and sites are needed that will facilitate the development of the sustainable infrastructure required to meet the London Plan (2011) waste apportionment figures (Table 4-2) and 100% net self sufficiency. The main types of waste produced include:

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

It should be noted that the London Plan (2011) apportionment targets are for municipal and commercial & industrial wastes only.

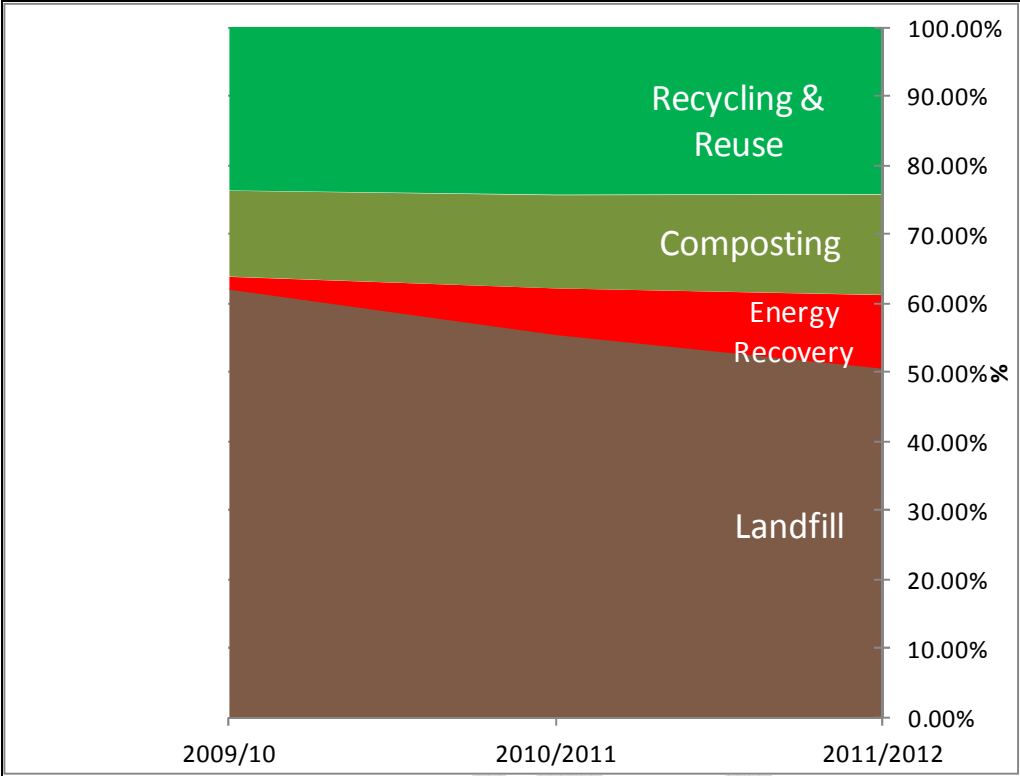
### 3.2 Municipal Solid Waste

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

3.2.2 As the statutory body responsible for managing MSW generated in the West London boroughs, the WLWA is procuring a new long term contract for the management of this waste. The main objective of the procurement is to significantly reduce the landfilling of residual municipal waste. The contract will involve the management of up to 300,000 tonnes of MSW per year.

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

Figure 3 – 1 West London Waste Authority MSW management (2008 – 2012)



Source: WLWA

3.2.4 In 2012 the WLWA and its constituent boroughs dealt with around 657, 000 tonnes of municipal solid waste (MSW), excluding abandoned vehicles. Of this total some 154, 000 tonnes was recycled, 90,000 tonnes was composted, and 93,000 tonnes was sent to Materials Recovery Facilities (MRFs) from which waste went on to other routes. Ultimately, 403,000 tonnes was sent either to Energy from Waste (EfW) or to landfill sites in Oxfordshire and Buckinghamshire (nearly all by rail from the WLWA’s transfer stations in Brentford and South Ruislip). See Table 3-1 below.

Table 3-1: WLWA management of Municipal Solid Waste 2012 (rounded to nearest 000)

Municipal Solid Waste management	Tonnes	Percentage
Recycling	154,000	23.3
Composting	90,000	13.7
Energy from Waste	117,000	17.8
Landfill	296,000	45
<b>TOTAL</b>	<b>657,000</b>	<b>100</b>

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

### **3.3 Commercial and Industrial Waste**

3.3.1 The most recent and comprehensive national Survey of C&I waste arisings<sup>13</sup> took place in 2009. This survey estimated that West London produced 845,000 tonnes of C&I waste during that year, which is a reduction of 621,000 tonnes (42%) on the previous C&I Survey conducted in 2002/03 (this estimated that 1,466,000 tonnes of C&I waste was produced). Work carried out to underpin the London Plan (2011)'s apportionment targets has estimated that West London produced 1,299,000 tonnes of C&I waste in 2009 and for the purposes of consistency, this estimate has been used in the Plan

### **3.4 Construction, Demolition and Excavation Waste**

- 3.4.1 It is estimated that just over 3 million tonnes of Construction, Demolition and Excavation waste (CD&E) waste is produced in West London each year. This is managed at sites within and beyond West London. This estimate is based on consideration of previous national surveys and analysis of data within the most recent Environment Agency Waste Data Interrogator (WDI).
- 3.4.2 According to the EA WDI 2012, around 776,000 tonnes of CD&E was imported for management at facilities within West London last year. This estimate is based on an analysis of waste managed at sites permitted for the management of waste by the Environment Agency, and does not account for aggregate production nor uses of CD&E in development (e.g. as an engineering material) which are exempt from the need for a permit. Table 3-2 below shows the management of CD&E waste in West London based on data from the EA Waste Data Interrogator.

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<sup>13</sup> DEFRA: Commercial and Industrial Waste Survey 2009 Final Report (May 2011) - <http://archive.defra.gov.uk/evidence/statistics/environment/waste/documents/commercial-industrial-waste101216.pdf>



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

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

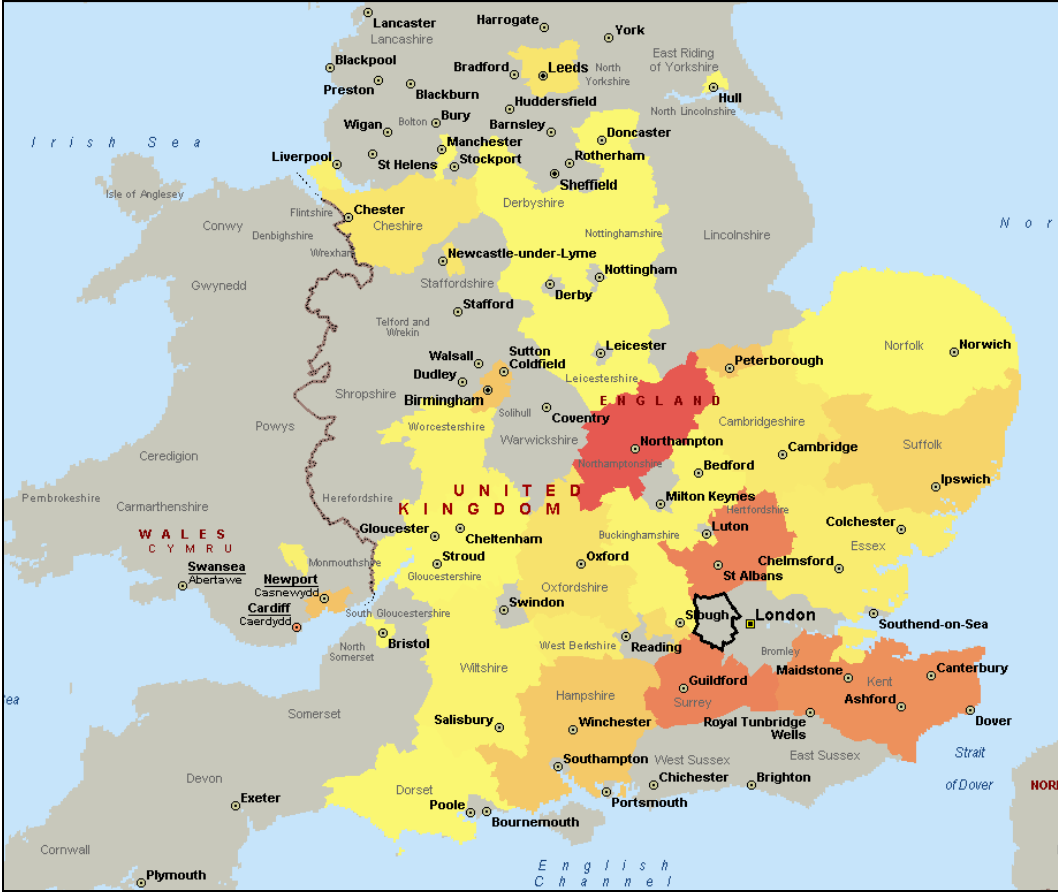
3.5 Hazardous Wastes

3.5.1

Hazardous wastes are categorised as those that are harmful to human health, or the environment, either immediately or over an extended period of time. They range from asbestos, chemicals, and oil through to electrical goods and certain types of healthcare waste. In 2012, West London produced just under 100,000 tonnes of which approximately 75% was exported for management. Compared with other waste streams generated in West London, hazardous waste is not a large waste stream, but does require a range of specialist facilities for treatment and disposal.

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

Increasing intensity of colour corresponds to increasing tonnage sent.



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

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

### **3.6 Wastewater and Sewage sludge**

3.6.1 Thames Water Limited is responsible for wastewater and sewage sludge treatment in London and, as part of this responsibility, it manages key pieces of sewerage infrastructure, including a number of sewage treatment works (STW). The majority of wastewater in West London is either treated at Mogden STW in Isleworth, Beckton STW in East London, 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 either through incineration with energy recovery, recycled to agricultural land or used for land restoration.

### **3.7 Agricultural Waste**

3.7.1 The Environment Agency Waste Data Interrogator (WDI) indicates that in 2012, a total of 7, 236 tonnes of waste from agricultural sources (EWC<sup>14</sup> chapter 02 01) in West London was managed at waste management sites with Environment Permits. 99% of this was managed through treatment. However this figure doesn't include waste types which are known to be produced on farms recorded in the WDI under other waste codes. The main types of this type of waste include:

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

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

### **3.8 Radioactive Waste**

3.8.1 Limited information is available regarding the generation of radioactive waste in West London, with no records held by either the Environment Agency or the Department of Energy and Climate Change. It has been 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.

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<sup>14</sup> EWC = European Waste Classification

3.8.2 Most radioactive waste produced by minor waste producers is not reported in the UK Inventory as it is either low volumes of LLW that can be disposed of by “controlled burial” at landfill sites under special licence, or low volume VLLW that is disposed within the MSW and C&I waste streams. The nearest available landfill accepting LLW is a nationally strategic site in Northamptonshire. In addition a High Temperature Incinerator in Fawley, near Southampton has some capability to deal with these types of waste too. These facilities are preferred for use than sending it to the dedicated facility in Drigg, Cumbria.

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

### 3.9 Cross boundary Movement of Waste

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

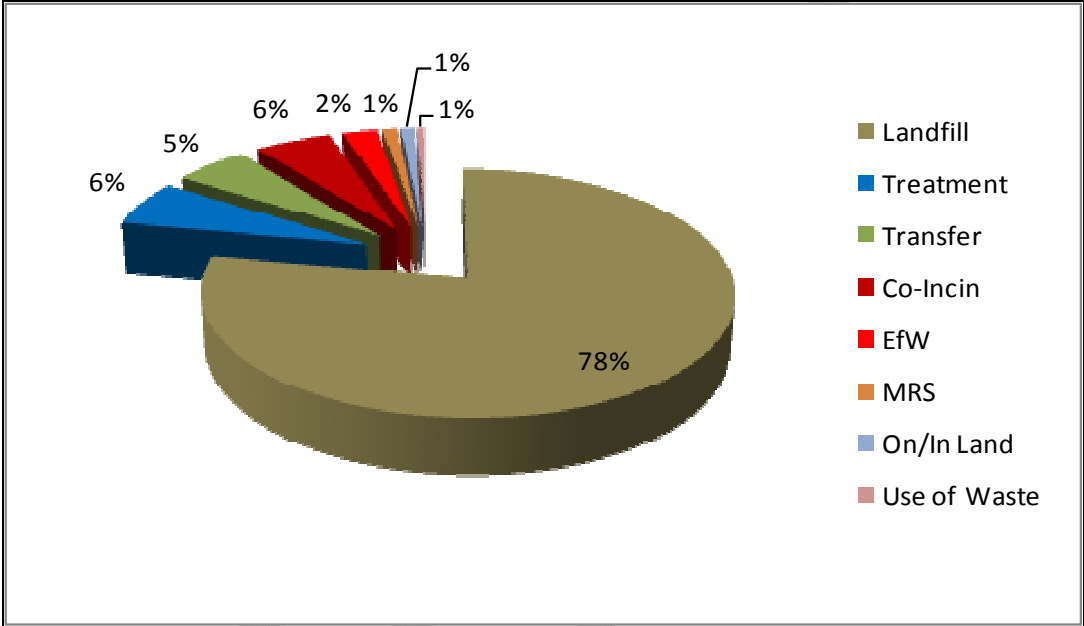
*Table 3-3: Principal Flows of West London Waste out of West London, 2012 & data sources  
(% shown is expressed as total of waste stream exported)*

	Tonnes	Principal Destination	Principal Management Route
Municipal Solid Waste (from WDF)	340,000	Bucks (45%) Oxon (30%) Slough (9%)	Landfill Landfill EfW
Hazardous waste (WDI plus HWI)	74,000	Northants (9%) Herts (7%) Kent (6%) Surrey (6%) Hants (4%) Peterboro (4%)	Treatment Treatment Recovery/Treatment/Landfill Treatment Transfer Treatment /Landfill
Commercial and Industrial Waste (from WDI +)	418,000	Bucks (84%) Berks (14%) Herts (7%)	Landfill Landfill Landfill
Construction, Demolition and Excavation Waste (from WDI)	365,000	Bucks (56%) Berks (20%) Herts (12%)	Landfill Landfill Landfill
<b>TOTAL</b>	<b>1.3 million</b>		

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

- 3.9.2 Around 1.3 million tonnes of West London's waste were exported out of London in 2012. This comprises Municipal Solid Waste (MSW), Commercial and Industrial Waste (C & I), Construction, Demolition and Excavation Waste (C, D & E) and certain types of hazardous waste. A proportion of this waste is handled by the WLWA. Table 3-3 above shows the level of exports or flows out of the West London area.
- 3.9.3 Landfill accounted for almost 80% of the movements of all waste out of the Plan area as shown in Figure 3-3 below.

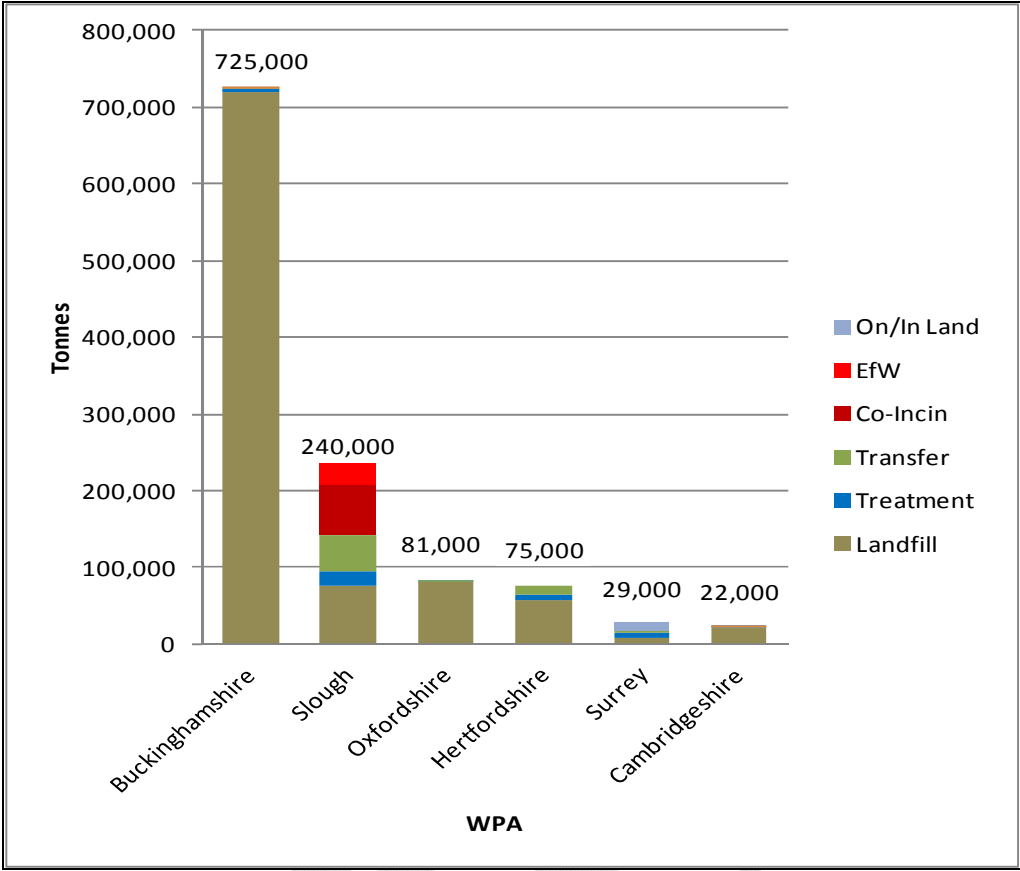
*Figure 3-3: Exports of waste out of West London by management type*



Source: WDI 2012

- 3.9.4 Figure 3-4 below illustrates that the majority of waste exported in 2012 was sent to Buckinghamshire (60%) and Slough (20%) followed by Oxfordshire (7%) with the remaining 11% divided between four other authorities. This has changed significantly from previous years when Bedfordshire received substantial quantities of waste for landfilling (just under 200,000 tonnes in 2011).

Figure 3-4: Where West London sent waste in 2012 by fate & WPA



Source: WDI 2012

**3.10 Role of Landfill in the Management of Residual Waste**

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

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

Type of waste received by site	Tonnes
Hazardous including via Separate Cell	5,459
Non Hazardous	1,079,915
Inert	57,655
<b>Total</b>	<b>1,143,029</b>

Source: WDI & HWI, 2012

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## 4 Future Waste Management

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

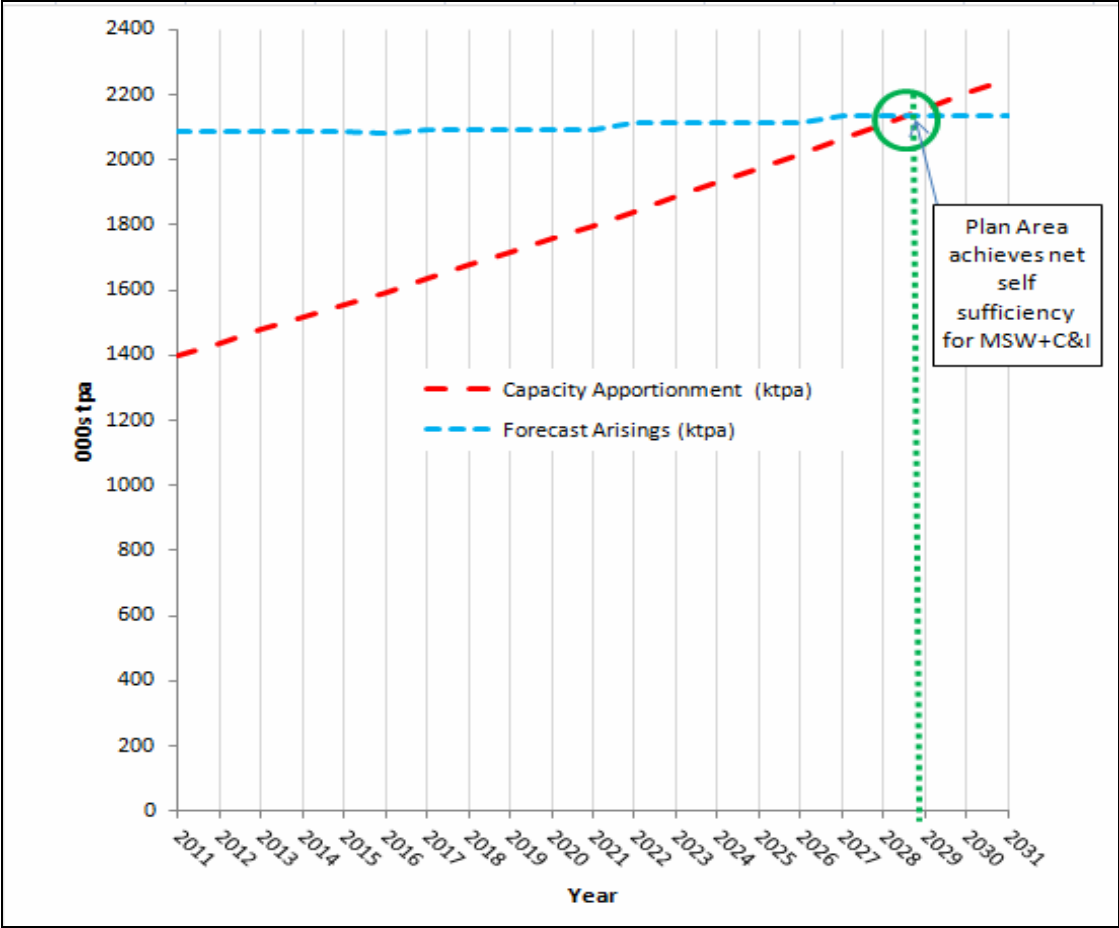
4.1.1 The London Plan (2011) sets a target for London to become the equivalent of 100% self-sufficient in the management of waste by 2031. To help achieve this target each borough has been given a share of London's total MSW and C&I waste to manage (called the borough's "apportionment" figure) for which it must identify sufficient and suitable potential sites for the development of waste management facilities. The West London boroughs have pooled their apportionments and will meet the collective apportionment figures through this Plan.

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

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

	2011	2016	2021	2026
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

Figure 4-1: Forecast arisings and capacity apportionment for West London boroughs from the London Plan (2011)



4.2 How much capacity is needed?

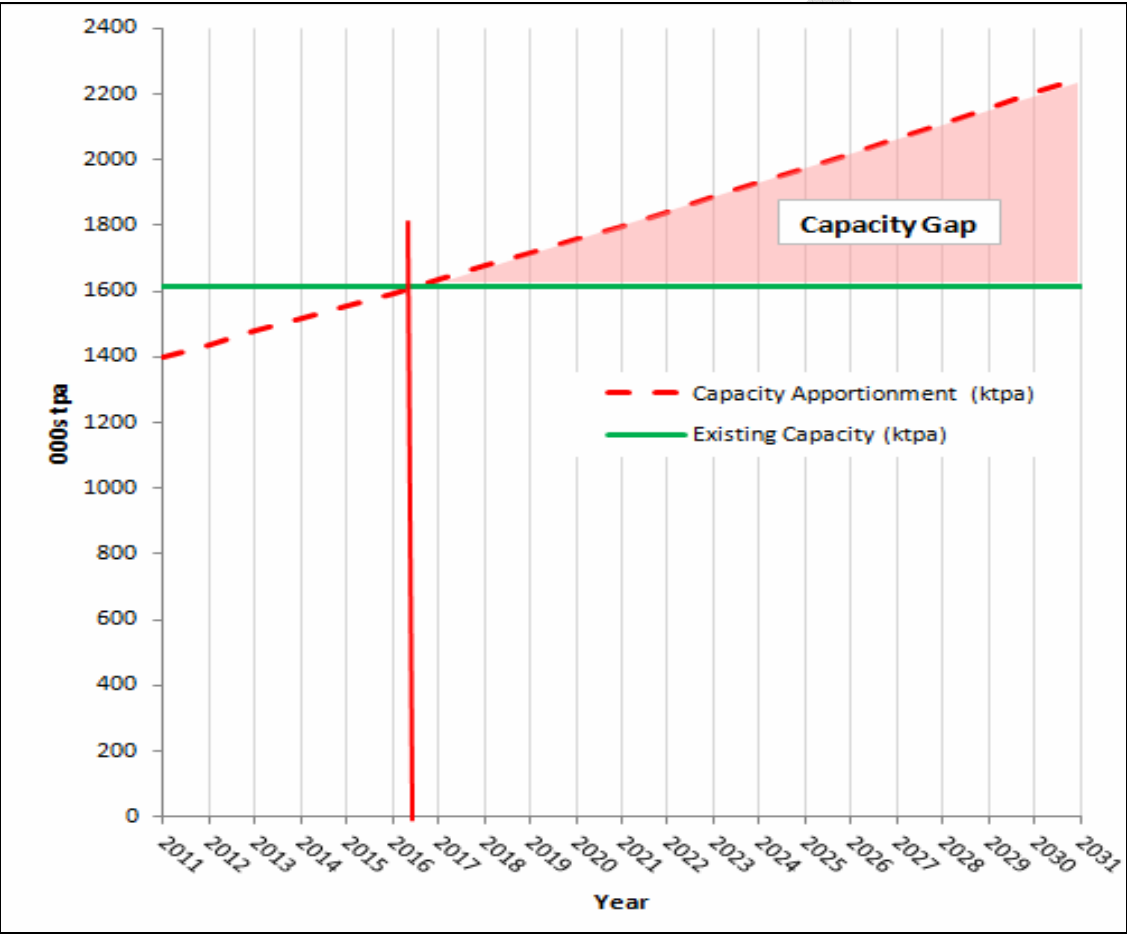
London Plan 2011 apportionment

- 4.2.1 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) separately as long as the total combined apportionment figure is addressed. This will require the delivery of sites and capacity as set out in the Plan.
- 4.2.2 Currently, West London has several sites where the management of waste is taking place. The intention of the Plan is to prioritise the use of the existing sites in West London, including redevelopment of some waste transfer sites and depots, and then adding some new sites for waste management uses, as necessary.
- 4.2.3 The current existing waste management capacity in West London is 1.64 million tonnes per annum including both waste treatment sites and the recycling undertaken



at household waste and recycling centres and civic amenity sites (see Appendix 1). Subsequently, additional waste management facilities will need to be developed in West London during the Plan period up to 2031 to address the 'gap' between the apportionment target and the waste management capacity that currently exists (see Figure 4-2 below). Table 4-2 below sets out the existing and projected waste management capacity in West London and the additional capacity required to address the apportionment 'gap' for target years.

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



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

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

amount,<sup>15</sup> based on the range of possible processes and their processing intensity.

4.2.5 The London Plan (2011) does not prescribe the specific waste management technologies, their scale, or the number that will need to be implemented across London. Accordingly, the West London Waste Plan also does not take a prescriptive approach to what types of waste management facilities/technologies are required. This approach allows for innovation in the management of waste to be incorporated into proposed development in West London.

4.2.6 The land required to meet the apportionment capacity gap is also displayed in Table 4-2 below. This shows that by 2031, West London boroughs will need to have an additional 9.4 hectares of land available for waste management.

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

	2011	2016	2021	2026	2031
<b>Apportionment (tonnes per annum)</b>	1,477,000	1,595,000	1,798,000	2,019,000	2,250,000
<b>Total existing waste management capacity (tonnes per annum)</b>	1,636,000	1,636,000	1,636,000	1,636,000	1,636,000
<b>Additional capacity required to meet the apportionment (tonnes per annum)</b>	0	0	162,000	383,000	614,000
<b>Land to address the capacity gap (hectares)</b>	0	0	2.5	5.9	9.4

4.2.7 To meet this land requirement, six existing waste sites (accounting for 10.44 hectares) have been identified as suitable and available for redevelopment. An additional 5.03 hectares of land currently not developed for waste management use has also been identified as suitable and deliverable (see Section 5 for details of the sites).

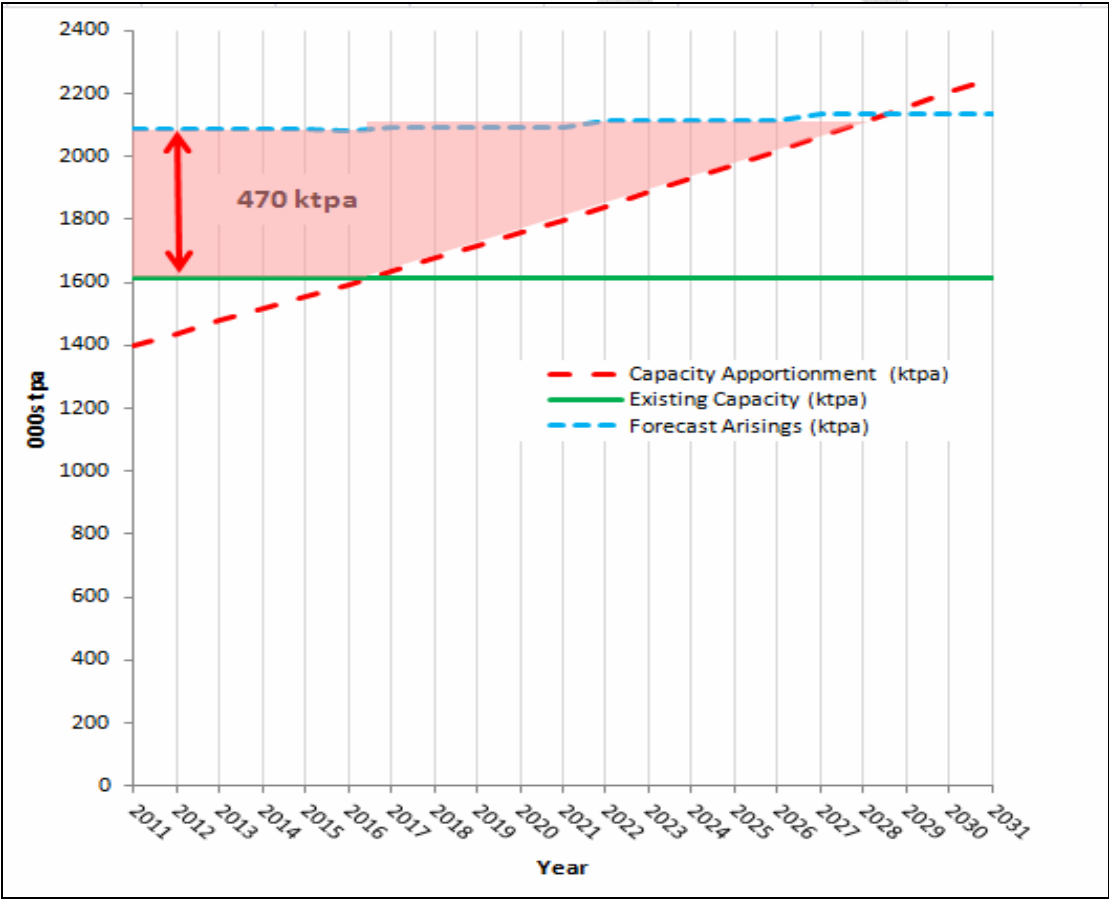
4.2.8 Overall, it is thus estimated that within West London there is 15.47 hectares of land suitable and deliverable for development for additional waste related uses. This exceeds the notional land requirements of the London Plan (2011) apportionment targets and creates some flexibility in the Plan should some sites not come forward for development during the lifetime of the Plan. Annual monitoring of the Plan will help assure that provision of sites remains sufficient for the Plan period.

<sup>15</sup> Calculations based on 'Table 4A.7 - throughput and land take of different types of facilities' from the London Plan (2008) and further discussions and agreement with the GLA in 2013.

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

4.2.9 PPS10 has a stated expectation that development plan documents should make provision for all waste arising within the Plan area. In this case the London Plan apportionment trajectory only aims for self sufficiency at 2029 (Figure 4 -1 above). Before that date there will be a shortfall of capacity between forecast arisings and existing capacity even if the apportionment targets are met. This is illustrated in Figure 4 - 3 below. The pink section shows this gap and the maximum amount per annum it represents is around 470,000 tonnes reducing from 2016 when provision to meet the apportionment target starts to kick in. To comply with PPS10 a strategy must be devised to address this shortfall.

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



4.2.10 To address the capacity gap, the following strategy has been developed. Firstly a long term contract for MSW has been entered into. This will involve the export of up to 300,000 tonnes per annum to an Energy from Waste facility in South Gloucestershire operated by SITA UK Ltd. In addition the WLWA has a contract to supply a minimum annual tonnage of 25,000 tonnes to Lakeside EfW plant until 2014/15 when 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 2034/5. While this export of material to generate energy is not countable towards the apportionment targets under the terms of the London Plan (2011) it will account for the bulk of the shortfall. In addition around 70,000 tonnes of waste may be sent to the Slough Heat & Power facility. So in total 460,000 tonnes per annum are accounted for to address the shortfall.

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

- 4.3.1 A range of different waste management facilities will be required to provide for management of waste within West London, including recycling, composting and energy recovery. Modern waste management facilities utilise clean technologies and are subject to stringent regulation and monitoring of their operations and impacts. Innovative design and architecture are important to ensure facilities are acceptable and sensitive to their settings, although many technologies can be housed in industrial building similar in appearance to a warehouse. Appendix 3 to this report gives a brief description of the principal waste treatment technologies.
- 4.3.2 It is important that modern methods of dealing with waste are found which also seek to produce value added, 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 management use and sets out policies to ensure development is suitable for the site and its surrounding land uses. The Plan is designed to be flexible to allow for developments and improvements in waste management technologies and the changing habits of consumers and waste producers. A planning application will be considered against the West London Waste Plan policies and other relevant policies and material considerations and be subject to public consultation.

### **4.4 Construction, Demolition and Excavation Wastes**

- 4.4.1 Construction, Demolition and Excavation (CD & E) waste is a large waste stream within London, although it is not included within the London Plan (2011) apportionment target assigned to boroughs. Work undertaken in support of the Plan has established that the Plan Area has a high level of capacity for this waste stream meaning that the Plan Area is already achieving net self sufficiency and that the London Plan (2011) city-wide targets are close to being met. This is expected to continue into the future and accordingly no allocations are made in this plan for facilities dealing specifically with such wastes. 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) and by using Policy WLWP 5 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**

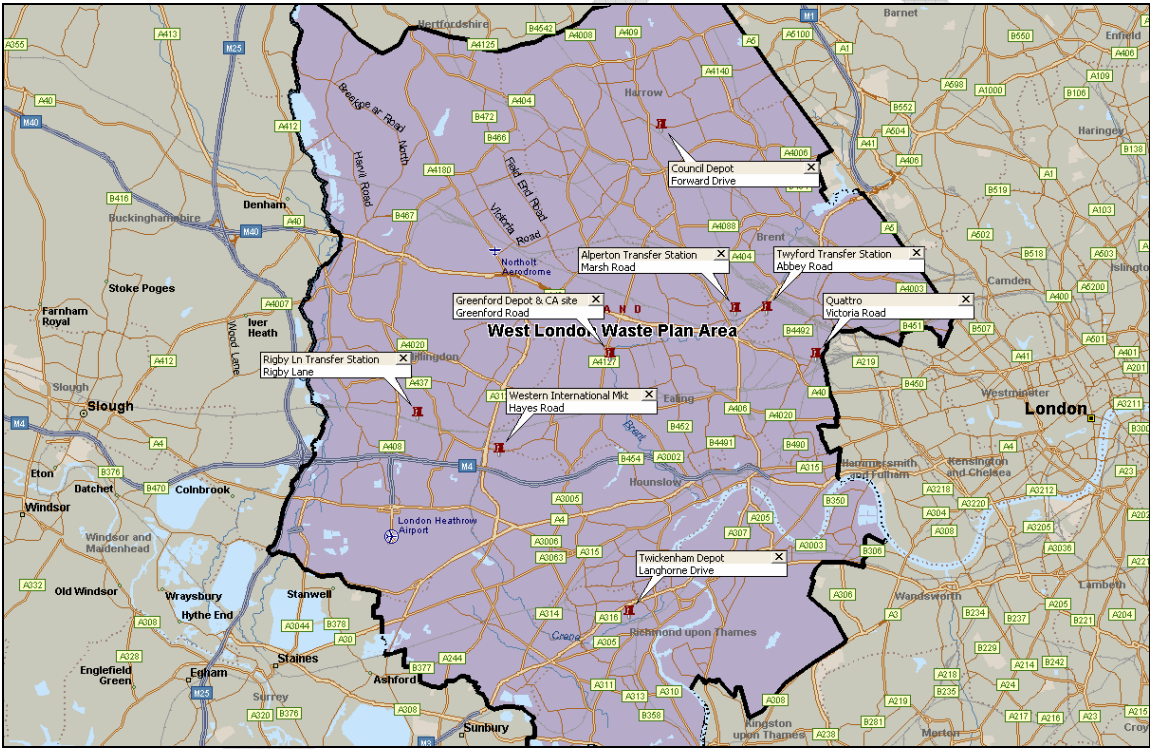
- 4.5.1 Policy 5.19 of the London Plan (2011) states that the Mayor will prepare a Hazardous Waste Strategy for London and will work in partnership with the boroughs, the Environment Agency, industry and neighbouring authorities to identify the capacity gap for dealing with hazardous waste and to provide and maintain direction on the need for hazardous waste management capacity. This policy also directs that existing hazardous waste sites should be safeguarded unless compensatory provision is made.
- 4.5.2 Work undertaken in support of the Plan has established that the Plan area has a moderate level of capacity for this waste stream with a number of sites managing hazardous waste within the Plan area. Other flows have been tracked with the general finding being that waste of this type travels within 1.5 hours of the Plan area for treatment. These flows are subject to further investigation under the Duty to Co-operate requirements but it is not anticipated that a substantial local need for new capacity will be identified. The West London Waste Plan therefore makes no specific provision for hazardous wastes. Planning applications for new hazardous waste facilities will be determined in the same way as applications for all waste management facilities and the capacity of hazardous waste facilities will be monitored closely to establish whether additional provision is required at a later date.

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# 5 The Sites

- 5.1.1 In accordance with the criteria outlined in PPS10, the West London Waste Plan identifies 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 subjected to a detailed evaluation and assessment which is documented in the accompanying Technical Report<sup>16</sup>.
- 5.1.2 The Plan identifies 15.47 hectares considered to be suitable and available on existing and new sites for future waste management. Table 5-1 sets out existing sites capable of redevelopment for future waste management purposes, while Table 5-2 refers to additional, new sites for waste management. Maps showing the location of the sites and their boundaries are also provided.

Figure 5-1: Location Plan showing all allocated sites



<sup>16</sup> WLWP Technical Report November 2011 - <http://www.wlwp.net/documents.html>

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

Site Number	Description	Site Type	Site Area (ha)	Borough
352	Twyford Waste Transfer Station	Transfer Station	1.46	Brent
1261	Veolia Transfer Station, Marsh Road	Transfer Station	2.71	Brent
309*	Greenford Reuse & Recycling Site	Transfer Station	1.78	Ealing
310*	Greenford Depot, Greenford Road	Depot Facility		
328#	Quattro, Victoria Road, Park Royal	Transfer Station	0.94	Ealing
331	Rigby Lane Waste Transfer Station	Transfer Station	0.88	Hillingdon
342	Twickenham Depot	Depot Facility	2.67	Richmond
<b>Total</b>			<b>10.44</b>	

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

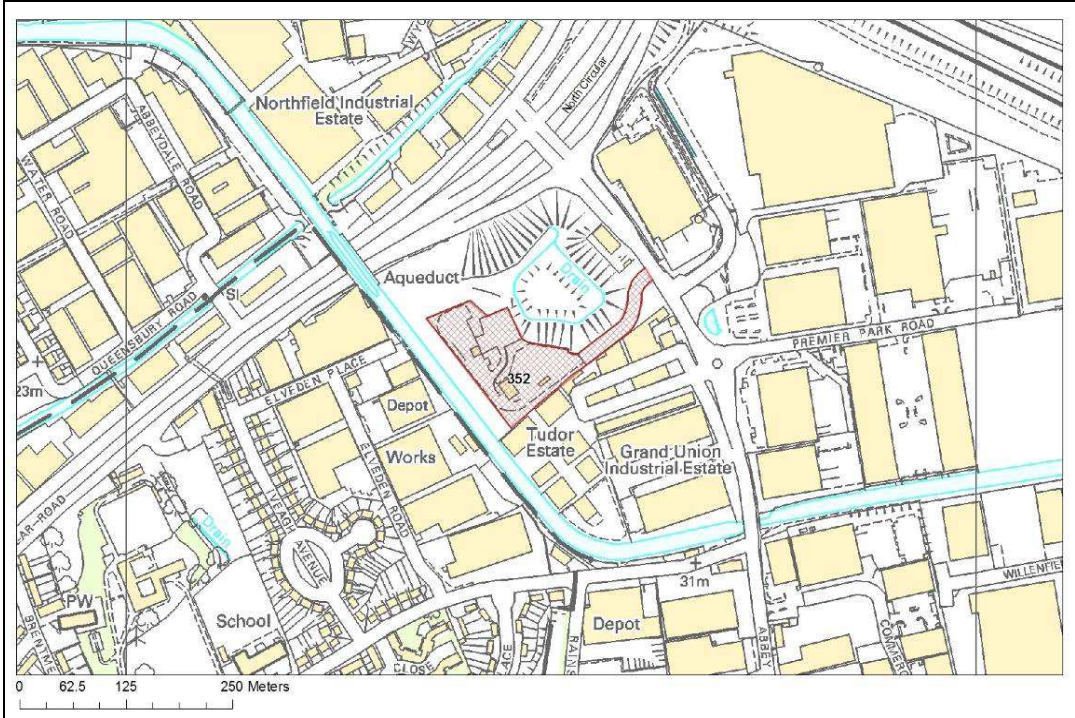
*# This site is subject to an HS2 Safeguarding Direction and will not be available from 2017 until 2024*

### **High Speed 2 (HS2)**

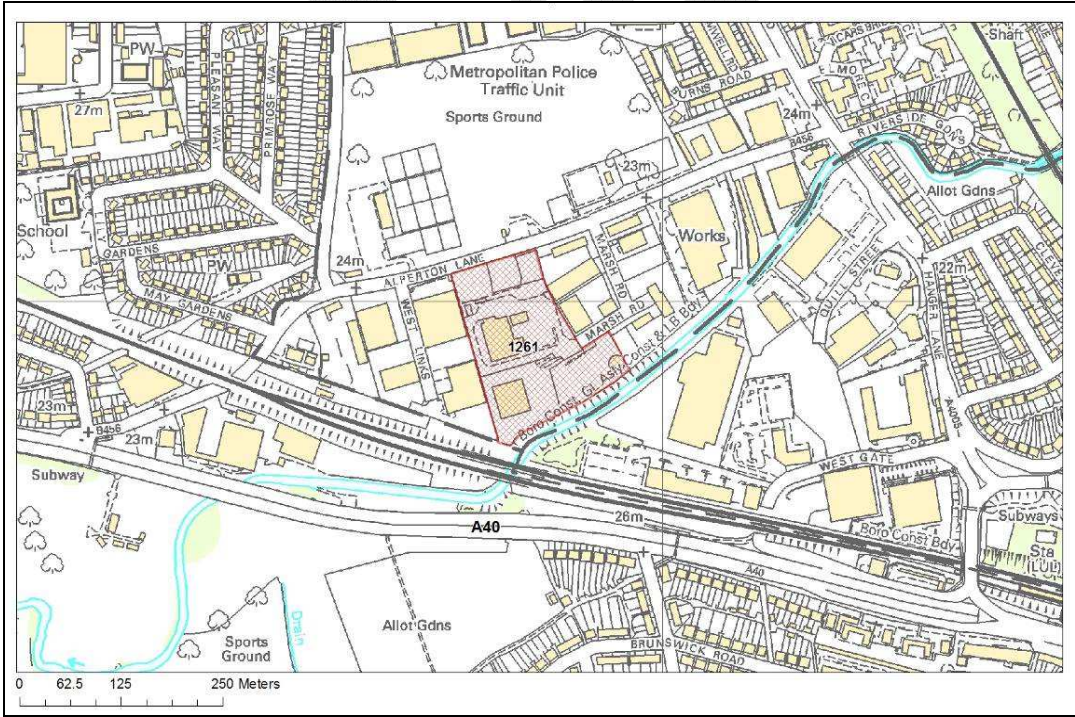
- 5.1.3 It should be noted that one of the sites proposed for allocation - Quattro at Victoria Road - has been identified by HS2 Ltd as requiring safeguarding under the HS2 Safeguarding Direction. This means that if HS2 proceeds it will only be available from 2024 for waste management uses, following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



Site 352 Twyford Waste Transfer Station, Abbey Road, Brent

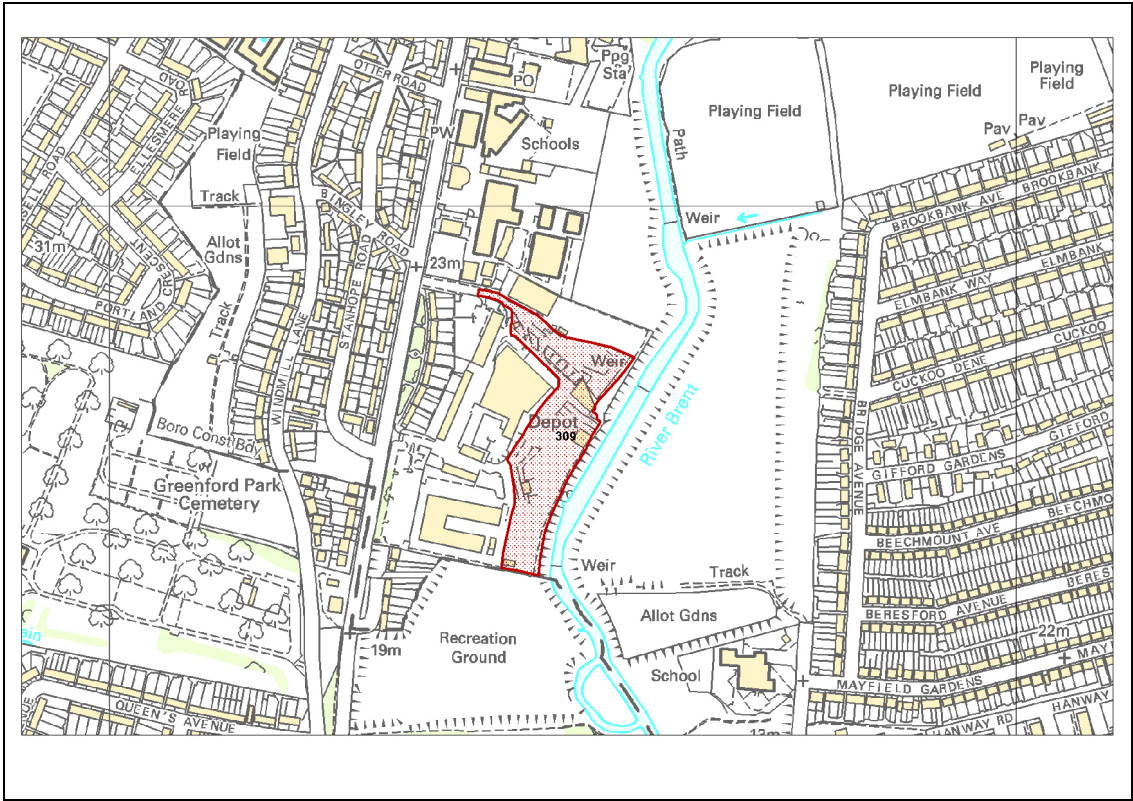


Site 1261 Veolia Transfer Station, Marsh Road, Alperton, Brent

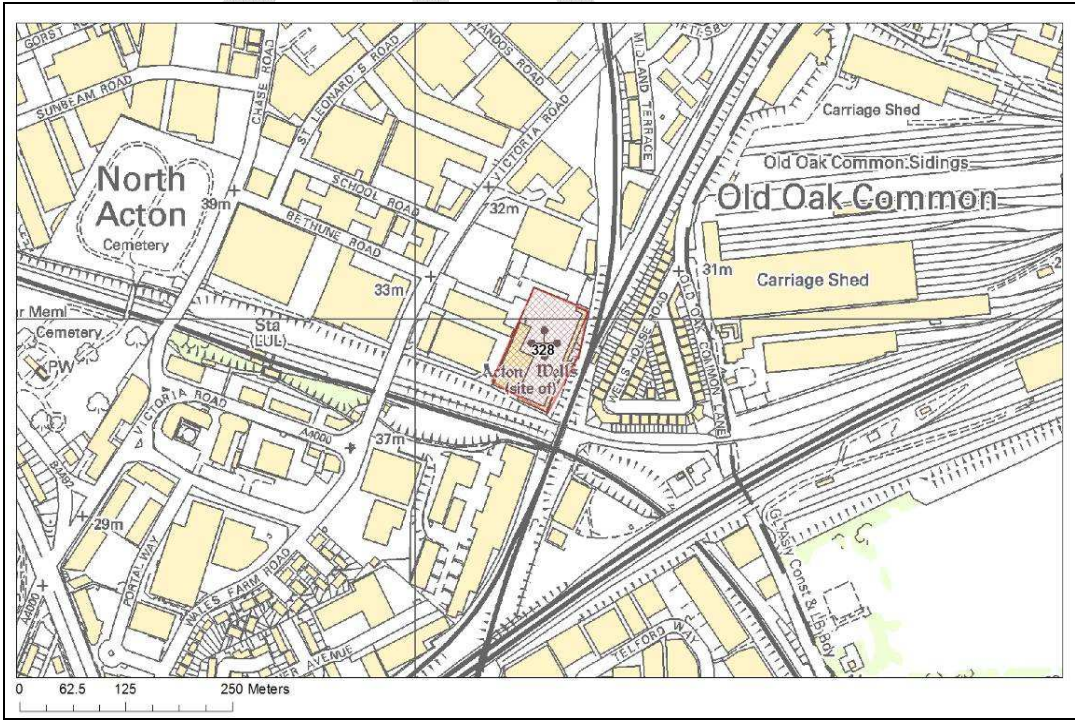




Site 309 Greenford Reuse & Recycling Site & Site 310 Greenford Depot, Greenford Road, Greenford, Ealing

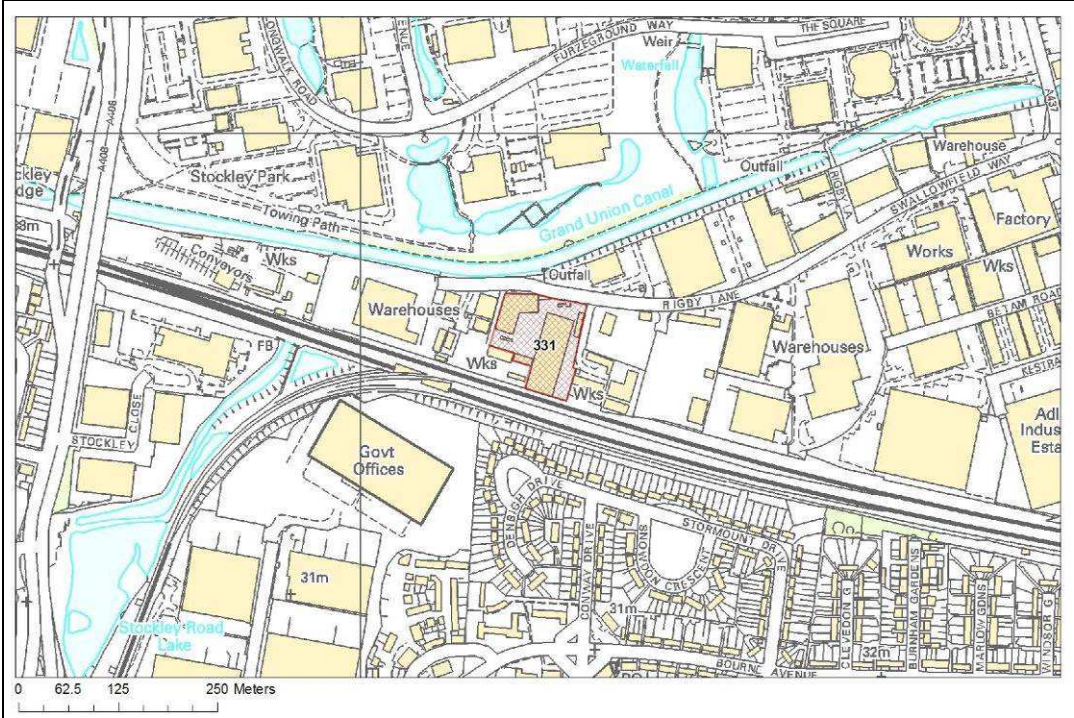


Site 328 Quattro, Victoria Road, Park Royal, Ealing





Site 331 Rigby Lane Waste Transfer Station, Hayes, Hillingdon



Site 342 Twickenham Depot, Langhorn Drive, Twickenham, Richmond

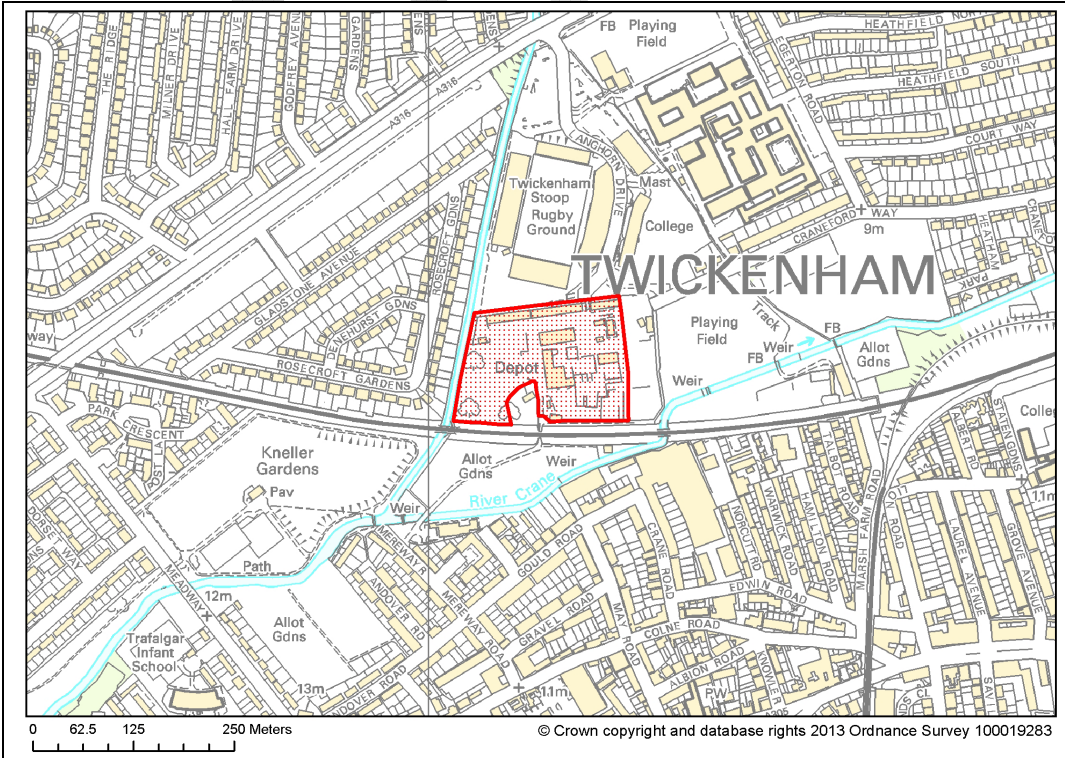
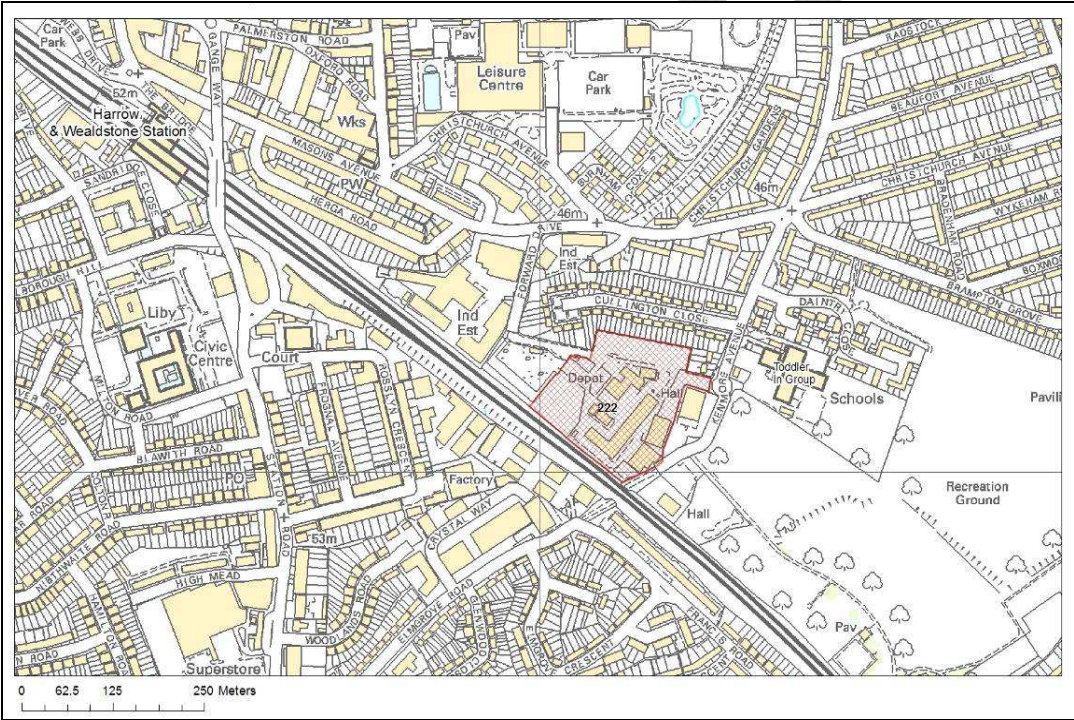




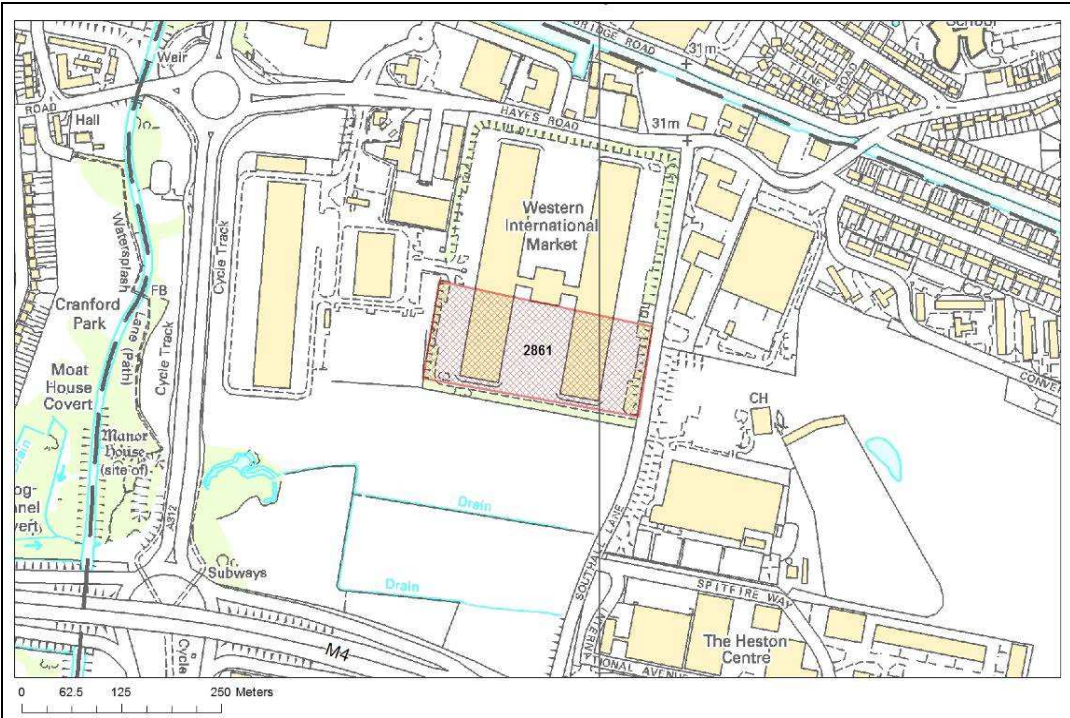
Table 5-2: Additional sites with opportunity for developing waste facilities

Site Number	Site Name	Site Area (ha)	Borough
222	Council depot, Forward Drive	1.83	Harrow
2861	Western International Market	3.20	Hounslow
<b>Total</b>		<b>5.03</b>	

Site 222 Council Depot, Forward Drive, Harrow



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



## 6 West London Waste Plan Policies

### 6.1 Policy WLWP 1 – Safeguarding and Protection of Existing and Allocated Waste Sites

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

Land accommodating existing waste management uses in West London will be protected for continued use for waste management, together with waste transfer and civic amenity sites required for the delivery of the West London Waste Authority's (WLWA) Municipal Waste Strategy.

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

To ensure no loss in existing capacity, re-development of any existing waste management sites must ensure that the quantity of waste to be managed is equal to or greater than the quantity of waste which the site is currently permitted<sup>17</sup> to manage, or that the management of the waste is being moved up the waste hierarchy.

Development for non-waste uses will only be considered on land in existing waste management use, waste transfer sites, civic amenity sites or land allocated in Table 5-2 if compensatory and equal provision of sites for waste, in scale and quality, is made elsewhere within the West London boroughs.

- 6.1.1 A list of all the sites that are in existing waste management use in the West London boroughs can be found in Appendix 1. All these sites are safeguarded in the Plan in accordance with Policy 5.17 G (a) and para 5.82 of 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 5.1 are those existing sites that the Plan considers have the potential for redevelopment for future waste purposes, including alternative forms of waste management that could result in waste moving up the hierarchy. Table 5.2 contains the list of additional sites that are allocated in the Plan for future waste 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).

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<sup>17</sup> "permitted" = granted planning permission

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

- 6.2.1 To ensure conformity with the London Plan (2011), the Plan identifies 15.47 ha of land for the development of waste management facilities to meet the pooled apportionment for the six west London boroughs up to 2031.
- 6.2.2 All existing waste management sites in the six boroughs, allocated transfer sites with potential for redevelopment, and new allocated sites are safeguarded for waste management uses under this Plan, unless an equal and compensatory and suitable, acceptable and deliverable site can be found, or there is an appropriate level of movement up the waste hierarchy.
- 6.2.3 The Plan identified the safeguarded existing sites and proposed new sites considered appropriate and suitable for waste management use as set out in Table 5-1 and Table 5.2. Policy WLWP 2 sets out the key criteria against which planning applications for waste facilities will be determined for the proposed sites.

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

Waste development proposals on existing waste management sites, waste transfer and civic amenity sites or sites listed in Table 5-2 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 may be permitted if the proposals comply with the other WLWP policies and the boroughs' adopted development plans, and:

- a. It can be demonstrated that the development is not suitable for, or cannot be delivered at any existing waste management sites, waste transfer sites, civic amenity sites or sites listed in Table 5-2;
- b. Identified sites have not come forward and it can be demonstrated that there is a shortfall in the waste management capacity required to meet the boroughs' joint apportionment target; and
- c. There is no adverse cumulative effect, when taken together with existing waste management facilities, on the well-being of the local community, including any significant adverse impacts against the WLWP sustainability objectives; and
- d. The proposed site meets the criteria set out in WLWP Policy 3.



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

- 6.3.1 Modern waste management facilities should bring a benefit to the 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 borough Local Plans, Development Management Policy documents, 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 matters which include how the facility complements the local area and ensure that there is no significant effect on existing transport facilities, Public Rights of Way, or public safety.
- 6.3.5 The road network within West London is regularly congested and therefore proposals must demonstrate active consideration of transport modes other than by road. There must not be any significant or unacceptable adverse impacts on the local road network or other road users, in terms of congestion or parking associated with the development. Proposals should demonstrate that adequate parking for all vehicles is available on site.
- 6.3.6 If the proposed waste development is required to have an Environmental Impact Assessment, then a Health Impact Assessment is also required.
- 6.3.7 The management of waste in accordance with the waste hierarchy is a key element of European, national and regional policy. West London boroughs support the increased management of wastes as far up the hierarchy as possible and each of the six boroughs has a commitment to waste minimisation and recycling/reuse. Waste minimisation is also an important issue to the residents and community within West London.
- 6.3.8 West London boroughs support the use of local, reclaimed, renewable, recycled and low environmental impact materials in construction and estate management. Their details should be considered and included within the sustainable design and construction statement. Materials should be sourced from within 100km from the site, where available and appropriate.



### WLWP Policy 3 – Ensuring High Quality Development

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

- a. Development will be permitted only where it can be shown that unacceptable impact to local amenity will not arise from the construction and/or operation of a facility;
- b. Adequate means of controlling noise, vibration, dust, litter, vermin, odours, air and water-borne contaminants and other emissions are incorporated into the scheme;
- c. 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;
- d. Active consideration has been given to the transportation of waste by modes other than road, principally by water and rail;
- e. 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;
- f. 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;
- g. An appropriate BREEAM<sup>18</sup> or CEEQUAL<sup>19</sup> rating will be achieved in order to comply with any adopted borough Development Plans;
- h. The development has no significant adverse effects on local biodiversity and it can be demonstrated that there will be no significant adverse impacts or effects on the integrity of an area designated under the “Habitats Directive”;
- i. There would not be a significant impact on the quality of surface and groundwater. The development should incorporate the principles of Sustainable Drainage Systems (SUDS) unless evidence is provided to justify alternative drainage methods;
- j. There will be no increased flood risk, either to the immediate area or indirectly elsewhere. Where necessary, this is to be demonstrated by a Flood Risk Assessment;

- k. Green Travel Plans have been considered, where appropriate.
- l. The site does not contain features, or will have a significant adverse effect on any heritage assets such as conservation areas, archaeological sites, listed buildings etc;
- m. There is no foreseeable adverse impact on health, and where necessary this is to be demonstrated by a Health Impact Assessment.

In addition:

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

#### **6.4 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.

#### **WLWP Policy 4 – Decentralised Energy**

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

- a. The local use of any excess heat in either an existing heat network or through the creation of a new network;
- b. The use of biogas/syngas in Combined Heat and Power facilities, either directly through piped supply or indirectly through pressurisation and transport;
- c. The use of any solid recovered fuel in Combined Heat and Power facilities or as a direct replacement for fossil fuels in London; or
- d. 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 boroughs support the increased management of wastes as far up the hierarchy as possible and each of the six boroughs has a commitment to waste minimisation and recycling/reuse. Waste minimisation is also an important issue to the residents and community within West London.
- 6.5.2 West London boroughs support the use of local, reclaimed, renewable, recycled and low environmental impact materials in construction and estate management. Their details should be considered and included within the sustainable design and construction statement and the Site Waste Management Plans. Materials should be sourced from within 100km from the site, where available and appropriate.

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

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

- a. At least 10% of the materials or products used in the construction and/or operation of the development are re-used or recycled and sourced from within 100km from the site;
- b. Construction, demolition and excavation wastes are reused or recycled on site, where practicable and environmentally acceptable; and
- c. Construction phase Site Waste Management Plans are comprehensive and capable of being delivered.

**6.6 Policy WLWP 6 – National Planning Policy Framework: Presumption in Favour of Sustainable Development**

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

**WLWP Policy 6 – National Planning Policy Framework: Presumption in Favour of Sustainable Development**

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

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

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

- a. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or
- b. Specific policies in the NPPF indicate that development should be restricted.

## 7 Monitoring of the West London Waste Plan

### 7.1 Monitoring Mechanisms and Proposed Indicators

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

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

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

- The quantity of municipal waste (tonnes) managed in the following ways:
  - Re-use;
  - recycling and composting;
  - other recovery;
  - landfilled;
- Comparison of municipal and commercial & industrial waste that is recovered compared with the apportionment targets set out in the London Plan (2011);
- Tonnage of construction, demolition and excavation waste managed, showing management method and whether management took place within or beyond the Plan area;
- The quantity of recycled aggregates produced in the Plan area;
- Tonnage of hazardous waste produced and managed, showing if management took place within or beyond the Plan Area;
- Amount of energy produced and delivered using waste as a fuel source; and
- Other indicators that may be decided to measure performance against policies and/or the Sustainability Indicators set out in the Sustainability Appraisal.

7.1.3 Where monitoring identifies that there is a major failure to meet the targets for waste management within the Plan area the six West London boroughs will seek to identify the reasons why this is occurring and take effective management measures to correct any problems.

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

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

<b>WLWP Policy</b>	<b>Indicator</b>	<b>Reason</b>	<b>Delivery</b>	<b>Delivery Agency</b>
Policy WLWP 1 & 2	Number and capacity of safeguarded sites and amount of any compensatory land provided	To ensure no loss of waste capacity in the West London area	The planning process	Local Authorities Waste industry Developers
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 To ensure sites are	The planning process and combined private and public initiative to provide waste management	West London Waste Authority Waste industry



WLWP Policy	Indicator	Reason	Delivery	Delivery Agency
	measured using: 1. Number of sites failing to comply with any relevant environmental permit 2. Number of enforcement complaints breaches of conditions	not causing harm to the environment or communities.	developments	
Policy WLWP 4	Amount of energy produced and delivered	To ensure compliance with the aims of the London Plan (2011) and required carbon savings	Through the planning process	Local Authorities Waste industry Developers
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
Policy WLWP 6	The success of the implementation of Policy 6 will be dependent on the success of implementation of all other policies	To ensure compliance with the NPPF	Through the planning process	Developers West London Boroughs

## 7.2 Review of the West London Waste Plan

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

## 8 Glossary

Term/Acronym	Definition
Anaerobic Digestion (AD)	A process whereby biodegradable material is broken down in the absence of air (oxygen). Material is placed into a closed vessel and in controlled conditions it breaks down into digested material and biogas.
Apportionment	Please see 'London Plan (2011) Apportionment'.
Area Action Plan	Type of Local Development Document focused on a specific location or area which guides development and improvements. It forms one component of a Local Plan.
Autoclave	A method of sterilisation. Waste is loaded into a rotating sealed cylinder and the biodegradable fraction of this waste is then broken down by steam treatment into a homogeneous 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 and other by-products.
Biodegradable Municipal Waste (BMW)	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 material (compost) can be applied to land to improve soil structure and enrich the nutrient content of the soil.
Construction, Demolition and Excavation Waste (CD&E)	Waste arising from the construction, maintenance, repair and demolition of roads, buildings and structures. It is mostly composed of concrete, brick, stone and soil, but can also include metals, plastics, timber and glass. Generally collected in skips.
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 waste management policy amongst other things.
Development Management Document	A set of criteria-based policies in accordance with the Local Plan, against which planning applications for the development and use of land and buildings will be considered. Also known as Site Development Policies.
Energy from Waste (EfW)	Energy that is recovered through thermally treating waste. EfW is also used to describe some thermal waste treatment plants.
Energy Recovery	The combustion of waste under controlled conditions in which the heat released is recovered to provide hot water and steam (usually) for electricity generation (see also Recovery).
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>20</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.

<b>Term/Acronym</b>	<b>Definition</b>
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 Local Development Documents are sound. Only persons who have made representations seeking change to a Local Development Document at the submission stage are entitled to an oral hearing at the examination.
Gasification	The thermal breakdown of organic material by heating waste in a low oxygen atmosphere to produce a gas. This gas is then used to produce heat/electricity.
Greater London Authority (GLA)	Strategic citywide government for London. It is made up of a directly elected Mayor – the Mayor of London – and a separately elected Assembly – the London Assembly.
Green Belt	A planning designation 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.
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.

<b>Term/Acronym</b>	<b>Definition</b>
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. It sets out how authorities intend to optimise current service provision as well as providing a basis for any new systems or infrastructure that may be needed. The Strategy should act as an up to date, regularly reviewed, route-map for further investment.
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).
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 Document (LDD)	Formerly known as 'Development Plan Documents', Local Development Documents are statutory documents prepared under the Planning and Compulsory Purchase Act 2004, which set out the spatial planning strategy and policies for an area. They have the weight of development plan status and are subject to community involvement, public consultation and independent examination.
Local Development Framework (LDF)	LDFs are now referred to as Local Plans. Formerly a portfolio of local development documents that provides the framework for delivering the spatial planning strategy and policies for an area.

<b>Term/Acronym</b>	<b>Definition</b>
Local Development Scheme (LDS)	A document setting out the local planning authority's intentions for its Local Development Framework; in particular, the Local Development Documents it intends to produce and the timetable for their production and review.
Local Plan	A Local Development Document (formerly known as a Core Strategy) which provides a written statement of the policies for delivering the spatial strategy and vision for a borough, supported by a reasoned justification.
London Plan (2011)	This is the Spatial Development Strategy for London. This document was produced by the Mayor of London to provide a strategic framework for the boroughs' Local Plans. It was first published in February 2004 and alterations have since been published in September 2006, September 2007, February 2008 and July 2011. It has the status of a development plan under the Planning & Compulsory Purchase Act 2004.
London Plan (2011) Apportionment	Allocates to each individual borough a given proportion of London's total MSW and C&I waste (expressed in tonnes) for which sufficient sites for managing and processing waste must be identified within their Local Plans.
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.
Planning Policy Statement 10 (PPS10)	Guidance document produced by central government relating to 'Planning for Sustainable Waste Management' which sets out a number of key concepts which should be considered and statutory requirements of local and regional planning policy documents.
Preferred Industrial Location (PIL)	Strategic employment site normally suitable for general industrial, light industrial and warehousing uses.
Proposals Map	A map showing the location of the sites identified in the Plan



<b>Term/Acronym</b>	<b>Definition</b>
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. The resulting materials can be used as fuel.
Residual waste	Residual waste refers to the material that remains after the process of waste treatment has taken place that cannot practicably be recycled, re-used, composted or recovered any further.
Re-use	The re-use of materials in their original form, without any processing other than cleaning and/or small repairs.
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.
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 Local Plan against which planning applications for the development and use of land and buildings will be considered. To set out all qualifying site allocations other than those contained in Area Action Plans.
Site of Special Scientific Interest (SSSI)	A 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.

<b>Term/Acronym</b>	<b>Definition</b>
Solid Recovered Fuel (SRF)	These are solid fuels (also known as 'Refuse Derived Fuels' – RDF) prepared from non-hazardous waste to be used for energy recovery.
Sound (Soundness)	According to the NPPF, for a plan to be “sound” it should be positive, justified, effective and consistent with national policy. “Justified” means that the document must be founded on a robust and credible evidence base and must be the most appropriate strategy when considered against the reasonable alternatives. “Effective” means that the document must be deliverable, flexible, and able to be monitored (see para. 1.6.4).
Spatial Planning	Spatial Planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function.
Special Protection Areas (SPA)	An SSSI which is considered to be of international importance designated under the EC Directive on the Conservation of Wild Birds.
Statement of Community Involvement (SCI)	A statement of a local authority's policy for involving the community in preparing and revising local development documents and for consulting on planning applications.
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 European Directive 2001/42/EC.
Sub-Regions	Sub-regions are the primary geographical features for implementing strategic policy at the sub-regional level.
Sustainable Waste Management	Using material resources efficiently to cut down on the amount of waste we produce and, where waste is generated, dealing with it in a way that actively contributes to economic, social and environmental goals of sustainable development.
Sustainability Appraisal (SA)	A formal process and statutory requirement which analyses and evaluates the environmental, social and economic impacts of a plan or programme.
Sustainability Appraisal Commentary	A commentary report that raises sustainability issues relating to the Issues and Options report.

<b>Term/Acronym</b>	<b>Definition</b>
Transport for London (TfL)	An integrated body responsible for London's transport system. The primary role of TfL, which is a functional body of the Greater London Authority, is to implement the Mayor of London's Transport Strategy and manage transport services across London.
Thermal Treatment	Treatment of waste using heat e.g. incineration, pyrolysis, gasification, etc.
tpa	Tonnes per annum.
Unitary Development Plan (UDP)	A type of development plan introduced in 1986, which was replaced by Local Development Frameworks, which in turn have been replaced by Local Plans.
Waste Arisings	The amount of waste generated in a given locality over a given period of time.
Waste Collection Authority (WCA)	Organisation responsible for collection of household wastes e.g. your local council.
Waste Local Plan (WLP)	Planning document which provides a basis for the provision of waste management infrastructure in a sub-region e.g. the West London Waste Plan (see 'West London Waste Plan').
Waste Disposal Authority (WDA)	Organisation responsible for disposing of municipal waste. For West London this is the West London Waste Authority (WLWA).
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 a given area.
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 respective areas.
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.

<b>Term/Acronym</b>	<b>Definition</b>
West London Waste Plan (WLWP)	The Waste Local Development Document being produced for West London (see 'Waste Local Plan').

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## 9 Appendices

**Appendix 1: Existing Waste Sites in West London**

**Appendix 2: Supporting Assessments**

**Appendix 3: General Waste Treatment Facility descriptions**

**Appendix 4: Borough waste arisings and apportionments**

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## Appendix 1 – Existing Waste Sites in West London

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



**Draft West London Waste Plan  
Proposed Submission Version**

<b>Operator Name</b>	<b>Facility Name</b>	<b>Site Activity</b>	<b>Borough</b>	<b>Counted Against Apportionment?</b>
		Transfer		
Bridgemart Ltd (Gowing & Pursey)	Atlas Wharf	CDE Waste Processing/ Transfer	Ealing	
Bridgemart Ltd (Gowing & Pursey)	Horn Lane Waste Transfer Station	CDE Waste Processing/ Transfer	Ealing	
Iver Recycling ( U K) Ltd	British Rail Goods Yard, Greenford	CDE Waste Processing/ Transfer	Ealing	
D B Schenker Rail (UK) Ltd.	Willesden Freight Terminal	Waste Transfer	Ealing	
Environmental Tyre Disposals Ltd	Chase Road, Park Royal	C&I Waste Processing	Ealing	
London Borough Of Richmond	Greenford Depot, Greenford Road,	MSW&C&I Waste Processing/ Transfer	Ealing	
London Auto Parts Ltd	Alperton Lane, Wembley	Metal Recycling	Ealing	
London Borough of Harrow	Forward Drive C A Site, Harrow	Civic Amenity Site	Harrow	
Metronet Rail B C V Ltd	Ruislip Underground Depot	CDE Waste Transfer	Harrow	
Paxton Recycling	Barratt Way, Wealdstone	MSW&C&I Waste Processing/ Transfer	Harrow	
R J Gower & G G Gower	Roxeth Green Avenue, South Harrow	Metal Recycling	Harrow	
Harrow Breakers	Pinner View, Harrow	Vehicle Depollution	Harrow	
Powerday Plc	Yiewsley Rail Sidings, Temporary H W R C	Civic Amenity Site	Hillingdon	
SRCL Ltd	Hillingdon Hospital	Clinical Waste Incinerator	Hillingdon	
Personnel Hygiene Services Ltd	Pump Lane Ind. Estate, Hayes	Clinical Waste Transfer	Hillingdon	
Country Compost Ltd	Crows Nest Farm, Harefield	Composting	Hillingdon	
West London Composting Ltd	High View Farm, Harefield	Composting	Hillingdon	
West London Composting Ltd	Pylon Farm, Harefield	Composting	Hillingdon	
A & A Recycling Ltd	Wallingford Road, Uxbridge	CDE Waste Processing/ Transfer	Hillingdon	
Bridgemart Ltd (Gowing & Pursey)	Civic Way, Waste Transfer Station	CDE Waste Processing/	Hillingdon	

**Draft West London Waste Plan  
Proposed Submission Version**

<b>Operator Name</b>	<b>Facility Name</b>	<b>Site Activity</b>	<b>Borough</b>	<b>Counted Against Apportionment?</b>
		Transfer		
Envirowayste (London) Ltd	Trout Lane Depot, West Drayton	CDE Waste Processing/ Transfer	Hillingdon	
Heathrow Airport Ltd	Cranford Lane T S, Heathrow	CDE Waste Processing/ Transfer	Hillingdon	
P G Allen	Allens Yard, Hayes	CDE Waste Processing/ Transfer	Hillingdon	
Uxbridge Skip Hire Ltd	Harvil Road, Harefield	CDE Waste Processing/ Transfer	Hillingdon	
Iver Recycling (UK) Ltd.	Holloway Lane Materials Recycling Facility	CDE Waste Processing/ Transfer	Hillingdon	
L J Grundon & Sons Ltd	High View Farm, Harefield	CDE Waste Processing/ Transfer	Hillingdon	
Hep Oils	Waybeards Farm, Harefield	Oil Reclamation Facility	Hillingdon	
Kershire Ltd	Station Goods Yard, West Ruislip	MSW&C&I Waste Processing/ Transfer	Hillingdon	
London Borough Of Hillingdon	New Years Green Lane Civic Amenity Site	Civic Amenity Site	Hillingdon	
West London Waste Authority	Victoria Road Waste Transfer Station, South Ruislip	MSW&C&I Waste Transfer	Hillingdon	
Balfour Beatty Rail Projects Ltd.	Ruislip Depot Hazardous Waste Containment Bay	Hazardous Waste Transfer	Hillingdon	
Powerbuild Ltd.	Downes Barns Farm Golf Course, Northolt	Land Recovery	Hillingdon	
B F A Recycling Ltd	New Years Green Lane, Harefield	Metal Recycling	Hillingdon	
SITA Wastecare Ltd	Rigby Lane Waste Transfer Station	Metal Recycling	Hillingdon	Inactive
Johal Mya Waste Management Ltd.	Wallingford Road Recycling Facility	MSW&C&I Waste Processing/ Transfer	Hillingdon	
Car Spares of West Drayton Ltd	Riverside Cottages, West Drayton	Vehicle Depollution	Hillingdon	
London Borough Of Harrow Council	Space Way Civic Amenity Site	Civic Amenity Site	Hounslow	
Heathrow Airport Ltd	Heathrow Airport Camp 4	Composting	Hounslow	
London Borough Of Harrow Council	Bridge Road Depot, Pears Road	CDE Waste Transfer	Hounslow	

**Draft West London Waste Plan  
Proposed Submission Version**

<b>Operator Name</b>	<b>Facility Name</b>	<b>Site Activity</b>	<b>Borough</b>	<b>Counted Against Apportionment?</b>
Fowles Crushed Concrete Ltd	Bedfont Trading Estate, Feltham	CDE Waste Treatment	Hounslow	
Quattro (UK) Ltd	British Rail Goods Yard, Brentford	CDE Waste Processing/ Transfer	Hounslow	
Day Group Ltd	Brentford Aggregate Materials Recycling Facility	CDE Waste, MSW & C&I Processing	Hounslow	(MSW/C&I only)
Ron Smith (Recycling) Ltd	St Albans Farm Recycling Facility, Feltham	CDE Waste Processing/ Metal Recycling	Hounslow	(Metal only)
Rentokil Initial Services Ltd	Brentford Service Centre, West Cross Ind Park	Clinical Waste Transfer	Hounslow	
Veolia E S Cleanaway (UK) Ltd	Bedfont Way, Feltham	General Waste Transfer	Hounslow	Inactive
West London Waste Authority	Transport Avenue Transfer Station, Brentford	MSW & C&I Waste Transfer & Civic Amenity Site	Hounslow	(CA only)
Hounslow Homes Ltd	Ashmead Road Depot	Hazardous waste transfer	Hounslow	
Mayer Parry Recycling Ltd	Transport Avenue, Brentford	Metal Recycling	Hounslow	
Thames Water Utilities Ltd	Mogden Sewage Treatment Works, Isleworth	Sewage Treatment	Hounslow	
Goldstar Commercials	North Feltham Trading Est., Feltham	Vehicle Depollution	Hounslow	
Whitton Salvage	Kneller Road, Whitton	Vehicle Depollution	Hounslow	
Thames Water Utilities Ltd	Kew Biomethane Plant	Biomethane Plant	Richmond	
London Borough Of Richmond	Townmead Civic Amenity Site, Kew	Civic Amenity Site	Richmond	
The Royal Botanic Gardens	The Royal Botanic Gardens, Kew	Composting	Richmond	
London Borough Of Richmond	Twickenham Depot	CDE Waste Transfer	Richmond	
Oakland Golf & Leisure Ltd.	Richmond Park Golf Club	Land Recovery	Richmond	
Sharpes Recycle Oil Ltd.	Arlington Oil Reclamation Facility, Twickenham	Oil Reclamation Facility	Richmond	

## Appendix 2 - Supporting Assessments

### **Strategic Flood Risk Assessment**

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

### **Equalities Impact Assessment**

The Equalities Impact Assessment (EqIA) was undertaken to ensure that the West London Waste Plan does not discriminate against specific target groups. The Equalities Impact Assessment of the Issues and Options identified the options that may have a negative impact on certain target groups. Since the development of the Plan's policies, a further assessment has been undertaken and suggested mitigation has been incorporated into the Plan and Sustainability Appraisal Report. We have taken this into account when developing the 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 draft Proposed Submission Version of the Plan.

### **Habitats Regulations Assessment**

The Habitats Regulations Assessment relates to Natura 2000 sites designated under the European Habitats and Birds 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 was undertaken to determine whether any of the recently developed policies are likely to trigger the need for a full Habitats Directive Assessment of the Plan, in compliance with the EC Habitats Directive.

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

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

## Appendix 3: General Waste Treatment Facility Descriptions

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



## Appendix 4: 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