

communities regeneration sustainability



West London Waste Plan

Proposed Sites and Policies Consultation
SUMMARY REPORT

June 2011

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

A report from **CAG Consultants**

June 2011

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Executive Summary

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

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

Of the consultation comments, 75% of respondents objected to one or more of the proposed sites¹.

One third of submissions² were against the sites proposed for Park Royal. Many of these were impassioned pleas from local residents with significant fears about the impacts of the sites. In addition a 193-signature petition against the sites was received. The site which received most specific separate objections was 191 (Atlas Road), closely followed by 186, 187, 182, and 183. The main issues mentioned were: the unfairness of locating so many sites in the area; the cumulative impact of new sites when added to existing waste and industrial facilities; proximity to housing; increased traffic; air pollution and the health impacts of pollution.

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

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

All the sites and policies included in the Plan will now be reviewed, taking account of the consultation comments and the results of a deliverability assessment³. It is intended to produce a new Plan with a revised list of sites and updated policies, which will be available for comment by the end of 2011.

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

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

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

1. Introduction

1.1 This report

This report is a summary of the responses received to the consultation carried out on the West London Waste Plan (WLWP) Proposed Sites and Policies report. The consultation was conducted during February and March 2011. This version of the report was published online on August 12th 2011. It contains some minor amendments for accuracy to the earlier version published online on July 3rd.

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

1.2 Summary of consultation

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

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

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

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



Figure 1 consultation leaflet

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

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

1.3 Level of response

In summary:

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

Details are shown in the table below.

Table 1 Consultation submissions

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

2. Key issues

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

Table 2 Key issues

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

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

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

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

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

3 Sites

3.1 Summary

The overwhelming focus of the consultation responses was on the 24 sites proposed for potential waste management use. The main objections were to site 241 (Tavistock Road Coal Depot West Drayton) and to the proposed sites at Park Royal. In addition to individual responses, the proposals against Tavistock Road and Park Royal sites were the subject of petitions. The chart below summarises the percentages of submissions commenting on sites. Looking at the combination of online responses to the short questionnaire and the other submissions, 75% were against some of the sites⁶.

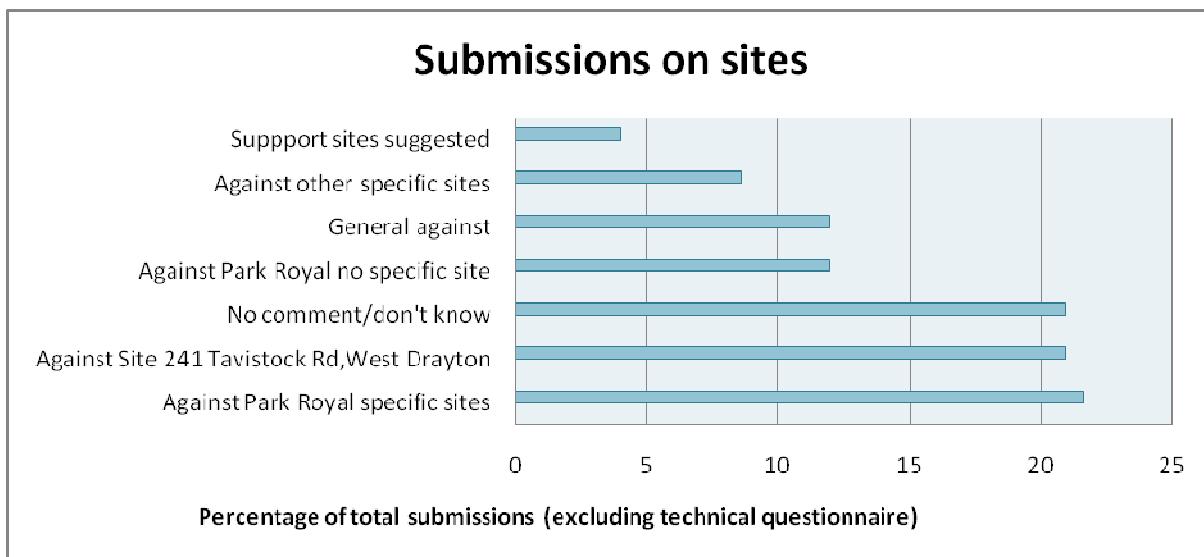


Figure 2 Breakdown of submission on sites

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

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

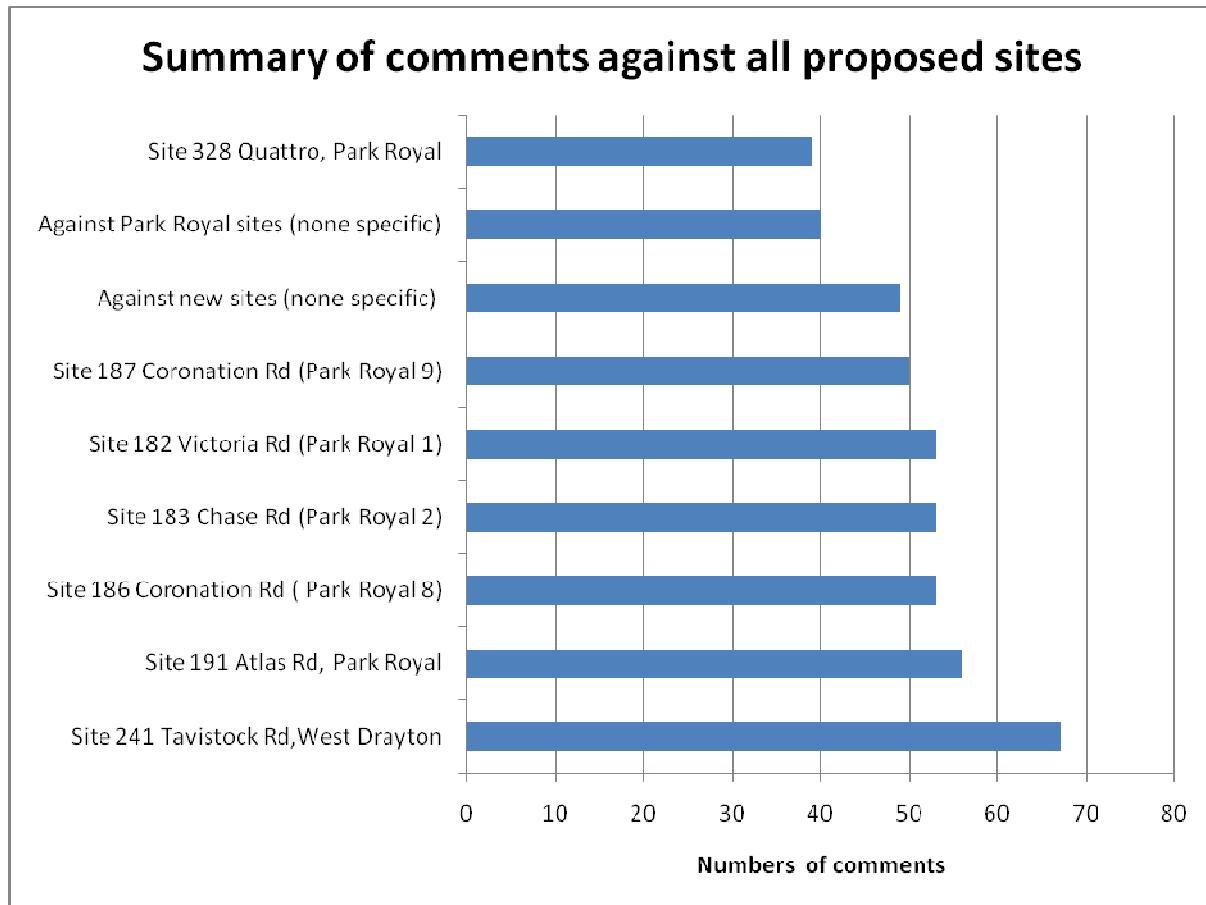


Figure 3 Summary of comments against all proposed sites

3.2 Park Royal sites

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

⁷ Includes technical questionnaire comments and comments against more than one site in the same submission

Table 3 Park Royal sites

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

As noted earlier, one third of submissions⁸ were against the sites proposed for Park Royal. In addition a 193 signature petition against the sites was received. There was also a public meeting against the sites, attended by over 50 people.

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

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

Reasons for objections to Park Royal sites

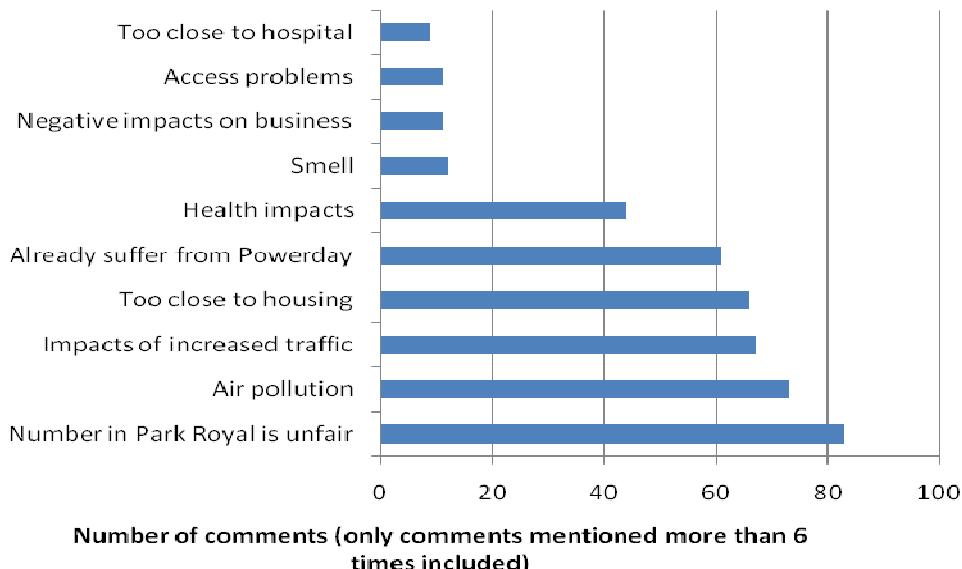


Figure 4 Reasons given for objecting to Park Royal sites

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

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

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

Many parts of Ealing borough suffer from poor air quality with high concentrations of PM₁₀ and NO₂ in many areas. Transport is the main source of these pollutants, particularly the road

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

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

Ealing borough is an Air Quality Management Area and the Council has three automatic monitoring stations in close proximity to many of the proposed sites in Park Royal (Ealing Hanger Lane Gyratory, Ealing Western Avenue, Acton and Ealing Horn Lane, Acton), all of which monitor PM₁₀ and NO₂. These regularly exceed national air quality objectives and EU targets, and one of the monitoring stations (Ealing Horn Lane) has recorded some of the highest PM₁₀ pollution levels in the UK. Air pollution in this area was recently the subject of a Parliamentary debate.

Similar strong opposition was expressed at a public meeting⁹ organised by the Wesley Estate Residents' Association. The meeting was attended by 53 residents, and there was unanimous opposition to the proposals. Attendees objected to the number of sites included in Park Royal, their proximity to local residents and the impacts of traffic and pollution.

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

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

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

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

⁹ Held in North Acton on 2nd March 2011

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

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

3.3 Tavistock Road Coal Depot

This proposed new site (site 241) received the most objections (67) of any single site. In addition 2 petitions were submitted against the site; one with 2201 signatures, and the second with 36 signatures and it was the focus of a meeting of the Yiewsley & West Drayton Town Centre Action Group, attended by over 20 people¹⁰.

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

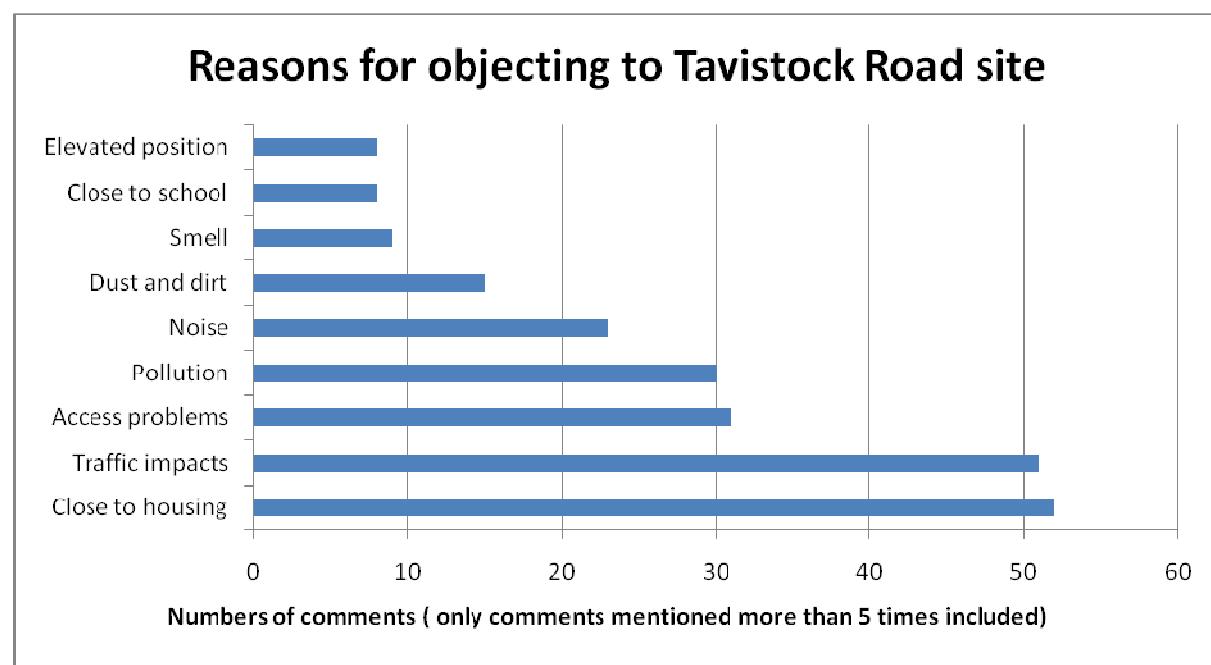


Figure 5 Reasons given for objecting to Tavistock Road site

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

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

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

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

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

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

Table 4 Traffic and access issues mentioned in submissions

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

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

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

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

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

3.4 Other existing sites proposed for redevelopment

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

All comments against existing sites proposed for redevelopment

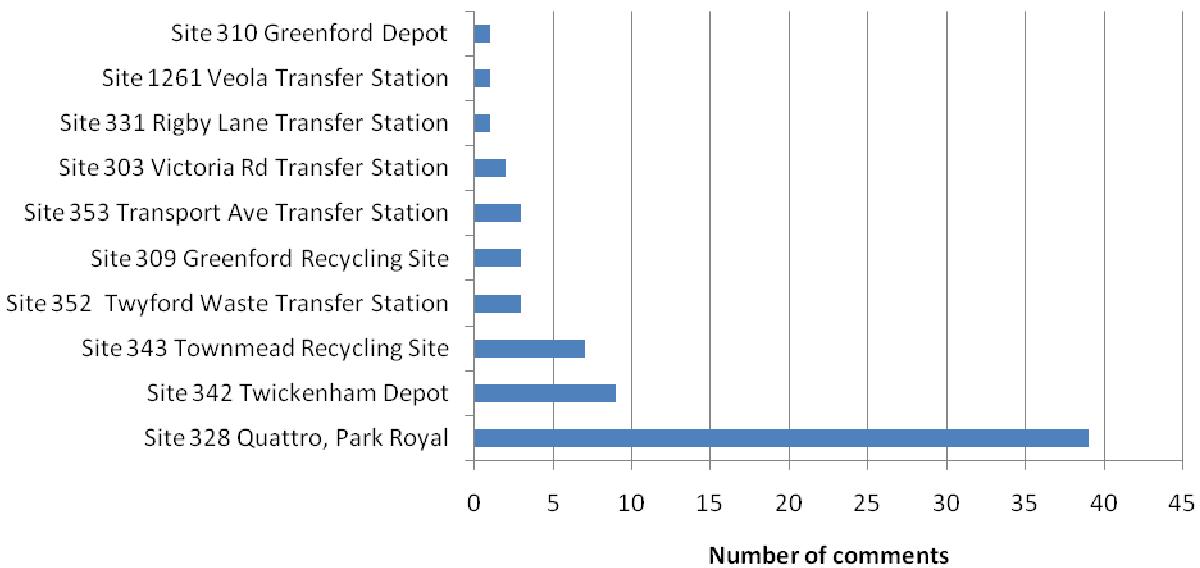


Figure 6 Total numbers of comments against existing sites proposed for redevelopment

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

The objections¹¹ received for all the existing sites outside Park Royal are summarised in the table below.

Table 5 Objections against existing sites (excluding Park Royal)

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

¹¹ Includes responses where issues are raised without a clear objection being stated

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

3.5 Other proposed new sites

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

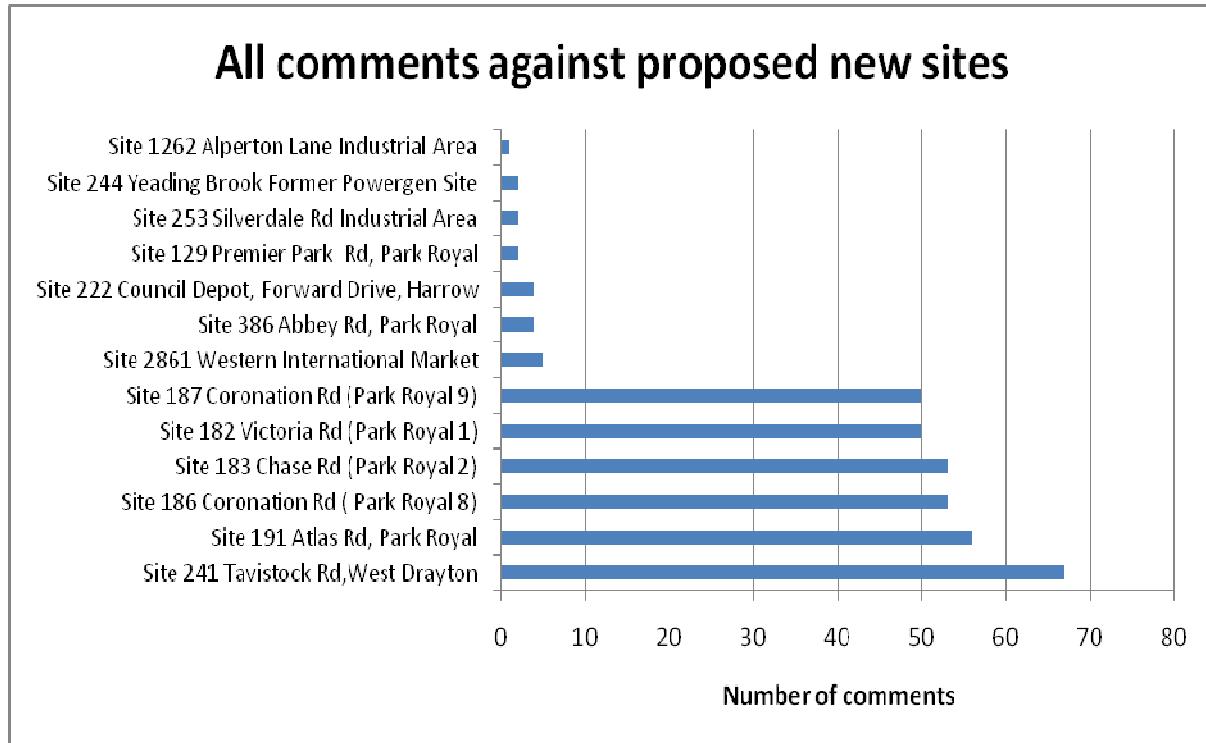


Figure 7 Total numbers of comments against proposed new sites

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

The objections¹² received for all the proposed new sites excluding Park Royal and Tavistock Road are summarised in the table below.

¹² Includes responses where issues are raised without a clear objection being stated

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

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

3.6 Additional sites suggested

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

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

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

Table 7 Sites promoted by landowners

Site	Borough	Landowner	Comment
Stockley Farm Road, Hillingdon	Hillingdon	Kerville Associates	In Green Belt but has been in industrial use since 19 th century.
Holloway Lane Sipson	Hillingdon	SITA UK	Sites 3711 and 3712, reviewed but not included within list of existing sites suitable for redevelopment. Exclusion is contested by SITA.
Holloway Close Sipson	Hillingdon	SITA UK	Site 400, reviewed but not included within list of existing sites suitable for redevelopment. Exclusion is contested by SITA.
Additional new sites		SITA UK	SITA state that they may have suggestions of additional sites over the coming months, and would like to bring these forward during the plan making process.
Thorney Mill Road, West Drayton	Hillingdon	Trehaven	Sites largely in and gains access from South Bucks District Council administrative area. Comprises a rail fed aggregates depot and bitumen plant as well as a plant hire yard.
Harlington Quarry Site (proposed for an anaerobic digestion plant)	Hillingdon	Summerleaze Ltd	Submission notes it is on brownfield land, remote from housing, has good access, and would have limited visual impact. It is in the green belt but the submission comments " <i>to make provision for AD plants a Green Belt site will be required</i> ".
Bedfont Trading Estate	Hounslow	Trehaven	Existing operational commercial waste and industrial site.
Rectory Farm	Hounslow	Rectory Farm	Site to be promoted to LB Hounslow for

Minerals and Waste Site		Landowners	minerals extract with inert landfill. Believe the co-location of inert landfill/recycling facilities for CDE waste could be included.
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4 Other consultation questions

4.1 The preferred approach

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

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

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

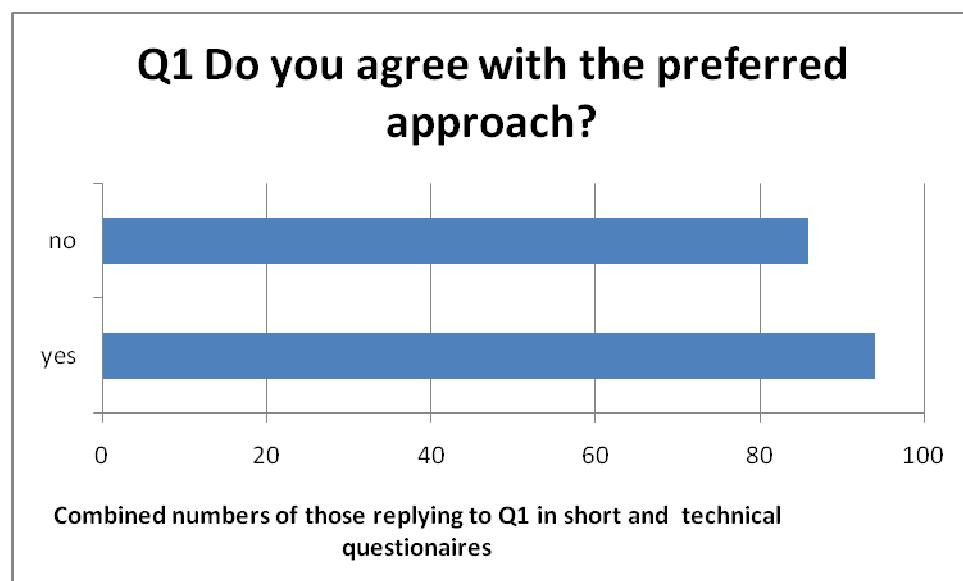


Figure 8 Views on the preferred approach

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

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

¹³ Taking all responses, 39% agreed, 35% disagreed and 26% didn't comment.

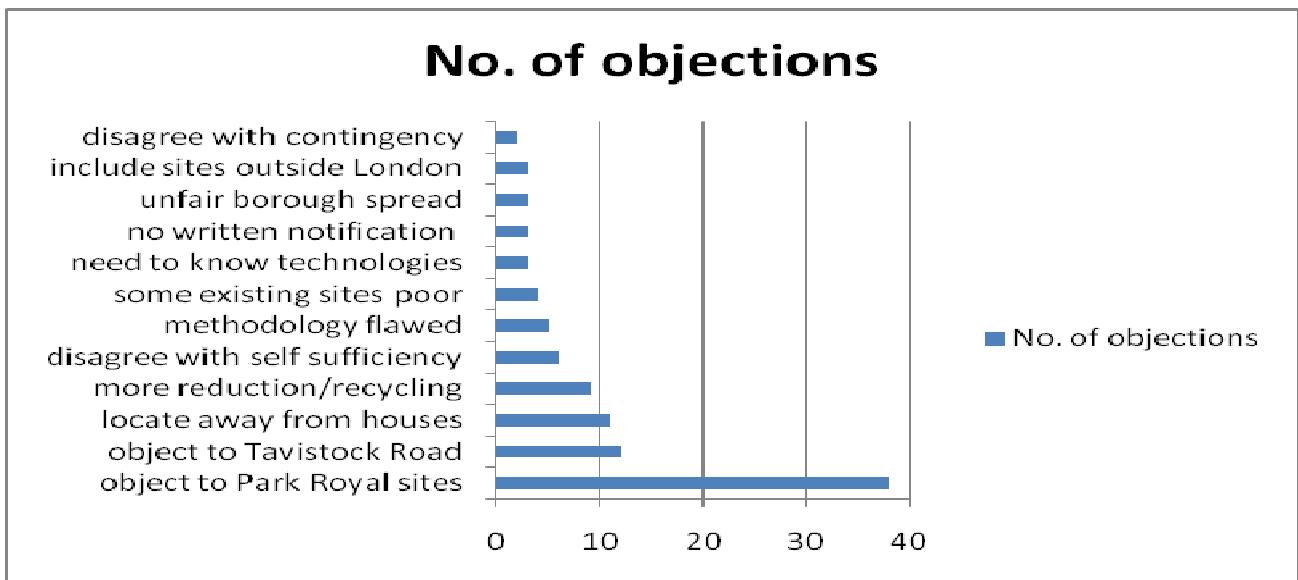


Figure 9: reasons for objecting to the preferred approach

Some relevant comments included:

- **Notification** - concern that not all site owners and occupiers had been contacted.
- **Specifying technologies** – In the Plan it is not proposed to specify technologies, but to specify sites. One respondent suggested that an issue with this approach is that not all waste facilities have the same site requirements. It was suggested that the approach therefore needs to be modified to make provision for Anaerobic Digestion sites, and similar facilities such as composting sites and Aggregates Recycling Facilities that need low value open sites.
- **Assumptions about use and capacity** -the Plan proposes that existing waste treatment facilities are assumed to operate at 75% of their licensed capacity (method used for apportionment within the London Plan) and Household Waste and Recycling Centres (HWRCs) at 50%. It was suggested that information on known usage should be used instead. It was maintained that licensed capacity often bears little resemblance to operational capacity and that, for example, HWRCs in Brent, Richmond and Ealing all currently recycle more than 50%.
- In terms of the **contingency**, one respondent suggested that the level of contingency provided for is excessive.

In the Draft Plan it is not proposed to specify technologies, but to specify sites. The fault of this approach is that not all waste facilities have the same site requirements. As noted above, AD sites cannot be provided on industrial land that may be 'deliverable' for an MRF or EfW facility. The approach therefore needs to be modified to make provision for AD sites, and similar facilities such as composting sites and Aggregates Recycling Facilities that need low value open sites.

-

4.2 Policies

4.2.1 Overview

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

- 19% agreed with all 4 policies;
- 46% didn't answer/didn't know for all 4 policies; and
- 35% either disagreed with some, or didn't express a view on some.

For the Short questionnaire:

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

For the Technical questionnaire (62 responses):

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

This is summarised in the chart below.

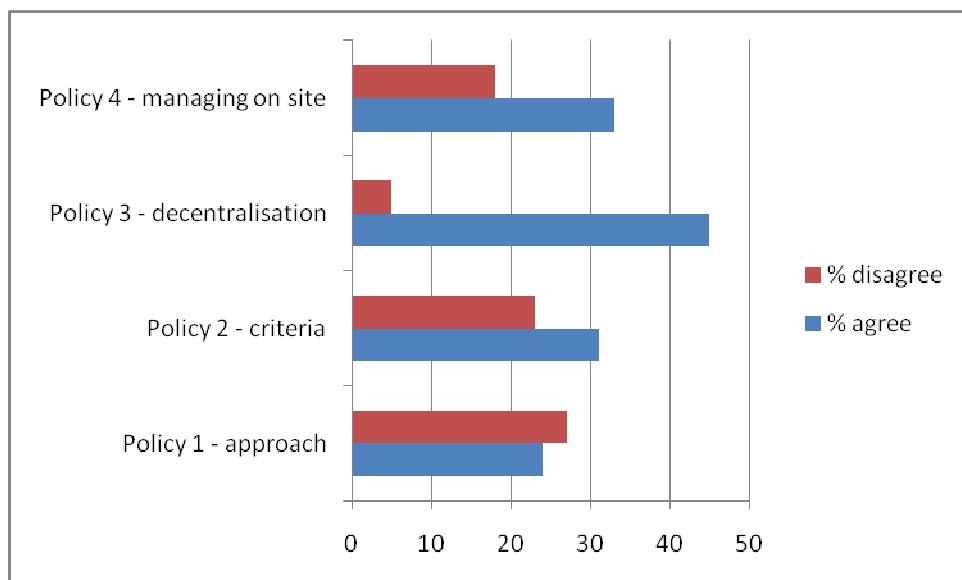


Figure 10 Policy summary (technical questionnaire)

4.2.2 Key issues

Policy 1

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

Policy 2

- In relation to Policy 2, enforcement is the key – many people's experience suggests that such criteria are ignored even when part of the waste licence. Monitoring should be as much about enforcing the prevention of impact to residents and the environment, as it is about tonnages;

- Many comments related to the transport criteria, with support for scoring sites with sustainable modes more highly and support for inclusion of waste transport emissions;
- The cumulative impact of sites clustered in particular areas should be assessed;

Policy 3

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

Policy 4

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

4.2.3 Detailed comments

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

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

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

<ul style="list-style-type: none"> • Need adequate means of controlling noise, dust, litter, odours and other emissions; • need provision for an Environmental Impact Assessment and an appraisal of the biodiversity impact; • development to be restricted to an appropriate scale, form and character; • active consideration to use of the Grand Union Canal (this is particularly relevant to two of the Hayes Town sites and is strongly welcomed by the Hayes Town Partnership); • adequate attention to the impact on the road network; • provision for a Health Impact Assessment; • inclusion of Green Travel Plans (particularly important for Town Centre locations); • need to develop the policies into more detailed plans, including involvement in private

companies;

- how the regulating authorities interpret phrases like 'adequate means of control' and 'no significant adverse effect';
- guidelines for developers need to be enforced and that the canals and railways can be used for bulk carrying to take trucks off the roads;
- importance of the transport impact assessment;
- assessing the impact of odours: are pollution dispersion studies being carried out, if so, how and by whom?

Policy WLWP1: Location of waste development

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

Table 9 WLWP Policy 1

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

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

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

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

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

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

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

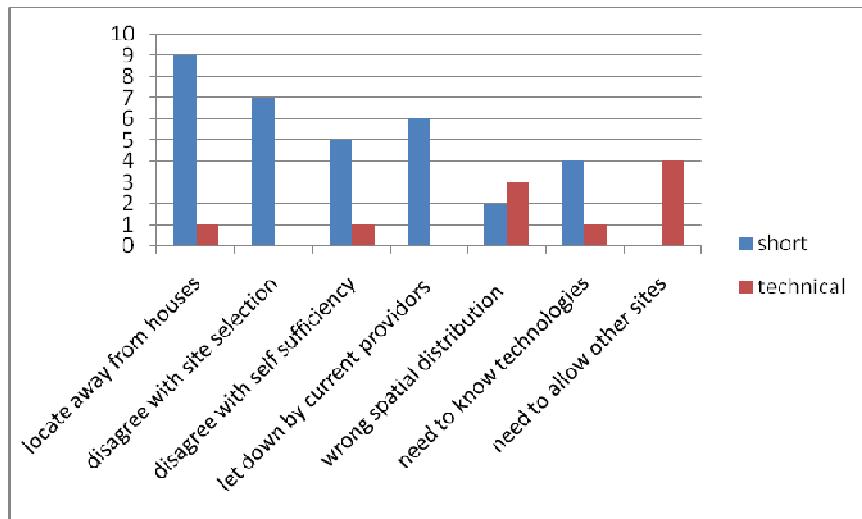


Figure 11 Reasons for objecting to Policy WLWP1 (numbers of objections)

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

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

Table 10 Specific concerns about policy 1

- WLWA had concerns about the last line of Policy WLWP1, suggesting that this line be deleted. This line requires that "to ensure no loss in existing capacity, redevelopment of any existing waste site must ensure that the quantity of waste to be managed is equal to or greater than the quantity of waste which the site is currently planned for." The Authority suggested that this is an unrealistic expectation since "*if any form of composting treatment is applied with gestation period measured in days or weeks, this will severely limit the potential through-put of a treatment facility when compared to a waste transfer station arrangement*" Surrey County Council thought that the WLWP would be better based on the Draft Replacement London Plan (especially if the waste apportionment has reduced);, One Consultee felt that the sites were undeliverable and this meant that the WLWP was unsound;

- One commercial waste operator was aware of unidentified land that it was interested in developing for waste use, but was concerned that identifying it in the WLWP may make waste use commercially unviable. It also felt that conditions stipulated for the development of other sites not allocated within the WLWP are too restrictive. Other concerns or suggestions include: one big facility would be preferable; the Plan should address waste water and sewerage issues; the level of consultation was insufficient; and criticism of the site selection methodology.

Policy WLWP2: Ensuring High Quality Development

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

Table 11 WLWP Policy 2

<p>All waste development proposals will be required to demonstrate, for the construction and operational phases of the development, that:</p> <ul style="list-style-type: none"> • adequate means of controlling noise, dust, litter, odours and other emissions are incorporated into the scheme; • there is no significant adverse effect on the established, permitted or allocated land uses likely to be affected by the development; where necessary this is to be demonstrated by a Environmental Impact Assessment • the development is of a scale, form and character appropriate to its location and incorporates a high quality of design; to be demonstrated through the submission of a design and access statement. An appropriate BREEAM or CEEQUAL rating may be required; • active consideration has been given to the transportation of waste by modes other than road, principally by water and rail; • transport directly and indirectly associated with the development will not exceed the capacity of the local road network; where necessary this is to be demonstrated by a Transport Impact Assessment; • the development makes a positive contribution to climate change adaptation and mitigation to be demonstrated through the submission of a sustainable design and construction statement; • the development has no significant adverse effects on local biodiversity and that there are no likely significant impacts or adverse effects on the integrity of an area designated under the Habitats Directive; • there will be no significant impact on the quality of surface and groundwater. A Sustainable Urban Drainage System may be required; • there will be no increased flood risk in line with PPS25; where necessary this is to be demonstrated by a Flood Risk Assessment; • there is no foreseeable adverse impact on health; where necessary this is to be demonstrated by a Health Impact Assessment; and • Green Travel Plans have been considered, where appropriate.

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

- One respondent considered that the language contained with WLWP Policy 2 sought to address minimum standards only, '*with not enough provision to encourage positive outcomes*'. For example, they suggested 'active consideration' for transportation is too vague, and felt that the Plan should go further than this and

state that more sustainable modes (i.e. rail and water) are scored higher. They applied the same principal to the point about 'positive contribution to climate change adaptation and mitigation', considering that those facilities providing a positive contribution should be scored higher. It was also suggested that the flexibility (a key over-arching principle throughout the Plan) of waste development proposals should also be considered positively, such that this will provide maximum opportunity to adapt to changes in the market which are inherently difficult to predict beyond the short-term;

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

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

- Make the policy more robust in terms of who arbitrates these criteria – make it clear 'to whom' and for 'how long';
- Consideration for residents should be paramount in these policies;
- Enforcement is the key – many people's experience suggests that such criteria are ignored even when part of the waste licence. Monitoring should be as much about enforcing the prevention of impact to residents and the environment, as it is about tonnages;
- Energy and CO₂ emissions in transporting waste should be included;

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

- Some felt that the transport implications were too narrowly defined in terms of local road network capacity. It was suggested that they should also be about impacting on the street as a place - particularly important for suburban streets typically

largely residential or 'High Streets' (shops etc with residential above). They felt that 'active consideration to transportation of waste by means other than road' is not emphatic enough and should be strengthened. The outputs/products of waste management which may no longer be termed waste should be included so that recycled material for reprocessing elsewhere is encouraged to be transported other than by road;

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

Policy WLWP3: Decentralised Energy

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

Table 12 Policy WLWP 3

All waste facilities that are capable of directly producing energy or a fuel must secure, where reasonably practicable: <ul style="list-style-type: none">• the local use of any excess heat in either an existing heat network or through the creation of a new network;• the utilisation of biogas/syngas in Combined Heat and Power facilities, either directly through piped supply or indirectly through pressurisation and transport;• the utilisation of any solid recovered fuel in Combined Heat and Power facilities or as a direct replacement for fossil fuels in London; or• any other contribution to decentralised energy in London;• Where it is demonstrated that the provision of decentralised energy is not economically feasible or technically practicable, the development shall not preclude the future implementation of such systems. Energy from waste facilities will only be considered where it can be demonstrated that they are a recovery facility as defined in the Waste Framework Directive.
--

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

- There were concerns about the impacts of concentrating waste and energy facilities in a particular area and any negative impact on communities. Also particular sites were also felt to be unsuitable for this approach;

- Technology such as anaerobic digestion and incineration should be located close to commercial areas and away from residential communities (400m cordon suggested);
- Waste development that would be able to generate significant energy would require specific site characteristics in terms of its specific character, scale and technology. No assessment of how the sites identified in the plan would perform in these terms has been presented. As a result, there is no clarity in respect of the effect on his policy or its implementation;
- Air quality issues may constrain some technologies e.g. biomass, incineration;
- Add a reference to the production of biogas/syngas for use in vehicles (i.e. waste collection fleet);
- Sites with the ability to co-locate facilities should be viewed positively in that they can maximize efficiencies of energy and fuel use;
- Four supporters of decentralised energy in principle didn't want this approach to create a preference for incineration;
- Need for local communities to be educated sufficiently about these provisions. Information must be provided in plain English and in a way that is directly relevant to the communities around these facilities. The benefits need to be made clear (e.g. cheaper energy?);
- Existing waste policies should be doing this now and investment proposed for new sites put into this area; and
- Any waste to energy facility should be CHP ready where appropriate. Biogas facilities such as AD should also be considered and the best environmental option used, whether this is providing energy for the grid or conversion of the fuel to a biogas for transport.

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

- Concerns about energy from waste related to the technologies, emissions/pollution and climate change impact;
- The West London Waste Authority, whilst supporting the policy's preference for use of any refuse derived fuel to be used in combined heat and power facilities in London or as a direct replacement for fossil fuels in London in principle, suggested that this is an impractical suggestion in the short-term, and indeed, possibly for the first five to ten years of the WLWP. The Authority noted that this requirement is caveated by the phrase 'where reasonably practicable', but as reasonably

practicable can be difficult to define it was suggested that the use of this fuel type in London is stated as preference rather than a requirement;

- Energy from Waste was felt by some to actively discourage greater recycling rates, as the quote below illustrates:

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

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

Policy WLWP4: Sustainable Site Waste Management

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

Table 13 WLWP Policy 4

To encourage sustainable waste management, waste management developments will be permitted where it can be demonstrated that:
• At least 10% of the materials or products used in the construction and/or operation of the

development are re-used or recycled and sourced locally;

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

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

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

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

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

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

operations of a site generally have much greater significance for sustainability/climate change than those relating to site development/construction.

4.3 Monitoring

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

The main issues for those disagreeing with the KPIs were:

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

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

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

Appendix A Questionnaires

Short Questionnaire

1. Do you agree with the preferred approach of meeting the London Plans waste predictions plus providing a level of flexibility in the event some sites are not found to be suitable?

Yes...

No...

Please provide reason(s): _____

2. Please provide your views on the existing and new sites identified within the document?

3. Do you agree with the 4 policies outlined in the document?

Yes...

No...

Please provide reason(s): _____

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

Yes...

No...

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

Technical Questionnaire

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

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

Do you agree with this general approach?

Yes...

No...

Please provide reason(s): _____

Is there anything else to include in the general approach?

2. Preferred approach of the WLWP

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

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

associated with the site;

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

Do you agree with the preferred approach?

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

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

Please provide reason(s): _____

Are there any other elements that should be included within the WLWP as part of the preferred approach? _____

3. WLWP Policy 1

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

Do you agree with WLWP Policy 1?

Yes...

No...

Please provide reason(s):

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

4. WLWP Policy 2

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

Do you agree with WLWP Policy 2?

Yes...

No...

Please provide reason(s):

Do you have any further comments and suggestions to make about WLWP Policy 2? _____

5. WLWP Policy 3

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

Do you agree with WLWP Policy 3?

Yes...

No ...

Please provide reason(s): _____

Do you have any further comments and suggestions to make about WLWP Policy 3? _____

6. WLWP Policy 4

WLWP Policy 4 encourages sustainable waste management, permitting waste

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

Do you agree with WLWP Policy 4?

Yes...

No...

Please provide reason(s): _____

Do you have any further comments and suggestions to make about WLWP Policy 4? _____

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

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

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

Yes, all of the sites are suitable...

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

Please provide reason(s):

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

Yes, all of the justifications are acceptable...

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

Please provide reason(s):

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

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

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

waste management facilities?

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

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

Please provide reason(s): _____

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

Yes, all of the justifications are acceptable...

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

Please provide reason(s): _____

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

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

No...

Please provide reason(s) why you think a particular site is suitable: _____

9. Monitoring the Plan

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

Do you agree with the key performance indicators?

Yes ...

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

Please provide reason(s):

10. Do you have any further comments?

Appendix B: additional information on objections

Park Royal sites

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

Table 14 Other reasons for objecting to specific Park Royal sites

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

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