

WEST LONDON WASTE PLAN: DRAFT PROPOSED SUBMISSION VERSION

Cabinet Member(s)	Councillor Keith Burrows
Cabinet Portfolio(s)	Planning, Transportation and Recycling
Officer Contact(s)	Jales Tippell – Residents Services
Papers with report	Appendix 1: Changes to West London Waste Plan Policies WLWP 1 and 2 Appendix 2: Additional Policy: Presumption in Favour of Sustainable Development Appendix 3: Changes to Sites Appendix 4: West London Waste Plan – Amended Draft Proposed Submission Version, 2013

1. HEADLINE INFORMATION

Summary	Approval was given by the Cabinet in November 2011 to proceed with consultation on the Proposed Submission Draft West London Waste Plan. This report explains the reasons why further redrafting of the Plan has since been required and seeks approval to proceed to consultation, followed by submission to the Secretary of State for Communities and Local Government.
Contribution to our plans and strategies	The West London Waste Plan forms part of Hillingdon's Local Plan and that of the Local Plans of its other five west London partner boroughs.
Financial Cost	Hillingdon's share of the cost of preparing and taking the West London Waste Plan Proposed Submission Draft forward for the next consultation stage can be met from existing revenue budgets for 2013/14.
Relevant Policy Overview Committee	Residents' and Environmental Services Policy Overview Committee.
Ward(s) affected	All.

2. RECOMMENDATIONS

That Cabinet:

- 1. Agrees the changes made to the draft West London Waste Plan detailed in this report including the policy wording changes and additional policy, as set out at Appendices 1 and 2, and changes to safeguarded sites set out at Appendix 3, following Cabinet's previous approval to proceed with consultation in November 2011.**
- 2. Approves the revised Proposed Submission Draft of the West London Waste Plan (attached at Appendix 4) for publication and subsequent submission to the Secretary of State for Communities and Local Government.**
- 3. Instructs officers to publish the Proposed Submission Version of the West London Waste Plan and the accompanying Sustainability Appraisal for a statutory period of six weeks, inviting representations on the soundness and legality of the Plan, prior to its submission to the Secretary of State for Communities and Local Government for formal examination.**
- 4. Delegates authority to the Deputy Chief Executive and Corporate Director of Residents Services to agree, in conjunction with the Cabinet Member for Planning, Transportation and Recycling to:**
 - a) consider the representations made on the soundness and legality of the Proposed Submission Draft of the Plan;**
 - b) make such minor amendments to the final draft Plan as are necessary to make it sound, in consultation with the five other London boroughs; and**
 - c) approve and submit the final draft Plan to the Secretary of State for Communities and Local Government for the purposes of carrying out an Examination in Public.**
- 5. Approves the Proposed Submission Draft of the West London Waste Plan as a material consideration for the purposes of development management.**
- 6. Notes that subject to the Inspector's decision post-examination, that the Plan will be recommended to full Council for formal adoption.**

Reasons for recommendation

These recommendations are sought to enable the Council to make meaningful progress on the West London Waste Plan (WLWP) in order to meet targets set out in the London Plan 2011 and the policy guidance in Planning Policy Statement 10 and the National Planning Policy Framework (NPPF), together with the requirements of the Localism Act, 2011.

The WLWP will in due course provide an up-to-date policy framework to assess planning applications for waste management facilities across the six west London boroughs, namely Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames. Planning applications for waste management facilities will also be assessed by each borough against their individual Local Plans, including local development management policies and any other material considerations.

Alternative options considered / risk management

If the Cabinet chooses not to approve the Draft Proposed Submission Version of the West London Waste Plan for further consultation, this will delay adoption of the final Plan and impede progress on the Local Plans of the six west London boroughs. It would also affect their ability to determine planning applications for waste facilities in their areas using the latest policy framework and supporting specialist evidence on waste issues.

Policy Overview Committee comments

None at this stage.

3. INFORMATION

Supporting Information

The West London Waste Plan (WLWP) - Background

1. The purpose of the WLWP is to set out a planning strategy to 2031 for sustainable waste management, deliver national and regional targets for waste recycling, composting and recovery and provide sufficient waste management capacity to manage waste arisings across the six west London boroughs. Planning applications for any new waste management facilities will be considered in the light of the WLWP policies and they will also be assessed by the relevant council against that individual borough's Local Plan, including its local development management policies and any other material considerations.
2. The drafting of the WLWP has taken into account relevant planning legislation, national planning policy statements, on-going advice from the Greater London Authority (GLA) and the Planning Inspectorate and also lessons learnt from professional planning bodies and agencies. The previous key consultation stages in the drafting of the WLWP comprised:
 - Issues and Options (February 2009)
 - Proposed Sites and Policies (February 2011)
3. Details of the previous consultation in February 2011 were reported to the Cabinet at its meeting on 24 November 2011, when it agreed to approve publication of the Draft Proposed Submission Version of the WLWP.
4. Since that decision was taken, five factors have delayed further preparation and publication of the Plan:

- a) The introduction of the Duty to Co-operate which came into effect in November 2011 as part of the Localism Act, 2011 and a subsequent nationally significant decision by an independent Planning Inspector, who, following the Examination in Public of the North London Waste Plan, recommended non-adoption of the Plan in his final report of 14th March 2013. In his decision on the North London Waste Plan the Inspector advised that to comply with the “Duty to Co-operate” introduced by the 2011 Localism Act, the boroughs needed to engage in the work of the relevant regional waste bodies and in one-to-one discussions with individual county waste planning authorities (WPAs) with jurisdiction for landfill sites where waste is sent for disposal. As a result of this, the north London boroughs agreed to start work on a new waste plan to comply with the Duty to Co-operate.
- b) The NPPF issued by the Government in March 2012 introduced a general presumption in favour of sustainable development. Legal officers have advised that a policy on this should be introduced into the WLWP, similar to that now included in Part 1 of the Hillingdon Local Plan adopted in November 2012.
- c) A need to resolve policy wording issues to achieve general conformity with the London Plan 2011 waste planning policies.
- d) A need to revise sites in the London Boroughs of Harrow, Ealing and Richmond-Upon-Thames as well as the change in availability of various sites originally identified in the 2011 draft of the WLWP.
- e) The withdrawal of consultants Mouchel in July 2013, due to financial and capacity issues and the subsequent need to procure new consultants, BPP Consulting LLP.

Duty to Co-operate

5. Legal officers have advised that following the introduction of the Duty to Co-operate and the decision in the North London Waste Plan case, the WLWP will similarly be expected to demonstrate evidence of having effectively co-operated to plan from the outset for issues with cross-boundary impacts when it is submitted for examination. Officers working on the West London Waste Plan have therefore started contacting the various WPAs which receive waste from West London seeking views on the proposed content of the WLWP. The main points covered in their responses revolved around concerns that:

- a. for some WPAs there was often only a limited period remaining (e.g. 2-3 years) for waste to be sent for landfill to their area. In order to be sound the WLWP will need to demonstrate that alternative provision will be available during the Plan period;
- b. the WLWP wording should be updated to fully reflect the National Planning Policy Framework, the 2011 review of the National Waste Strategy 2007 and the latest waste plans covering the counties;
- c. in order to properly reflect the wording of national waste planning guidance in Planning Policy Statement 10 the WLWP should consider all waste arisings in the West London area (especially hazardous waste);

- d. greater detail is required on monitoring and implementation; and
- e. details should be given in the Plan on the level of engagement that has taken place with other authorities. This is in order to satisfy an Inspector that the Duty to Co-operate has been complied with, especially as the Plan makes clear that on-going export of waste is likely to continue well into the Plan period and beyond.

6. Officers have also engaged in discussions with the GLA, London Councils, the East of England and South East England county regional waste bodies to progress further with the preparation of the WLWP so as to meet the requirements of the Duty to Co-operate.

Summary of Changes made to the Plan since the Cabinet approval of 24 November 2011

7. The Plan has now been extended to 2031 to take into account the delays to the Plan and to align with the London Plan 2011 apportionment target end date.

8. The main changes to the text of the Plan include:

- a. revising the wording of WLWP Policy 1 and WLWP Policy 2 to ensure that they are in general conformity with the wording of the waste planning policies in the 2011 London Plan (see Appendix 1);
- b. including a policy on the Presumption of Sustainable Development to conform to the NPPF (see Appendix 2).
- c. updating waste flow data and facility capacities in the Plan using information from the relevant WPAs and the latest available Environment Agency data (see Sections 3 and 4 of the Proposed Submission Draft of the West London Waste Plan attached at Appendix 4);
- d. revising the Plan text regarding:
 - the Duty to Co-operate
 - implications of the NPPF
 - further requirements of Planning Policy Statement 10
 - the review of the 2007 National Waste Strategy; and
- e. preparing further documents required to accompany the Plan at the Submission Stage, such as an accompanying Sustainability Appraisal.

Differences between the approved and revised versions of the policies

9. Appendix 1 shows the original wording used for policies WLWP 1 & WLWP 2 which was approved by the Cabinet in November 2011. Discussions with the GLA concerning the implications of the waste policies in the 2011 London Plan and subsequent discussion between the boroughs' officers have resulted in revised wording to policies WLWP 1 & WLWP 2. The key change here is a wording amendment concerning the safeguarding of both existing and proposed waste sites. Additionally, any adverse cumulative impact of a concentration of waste uses on an area is also to be taken into account when proposals come forward.

10. The revised version of WLWP Policy 1 differs from the approved version in the following ways:

- The first paragraph separates out land for waste management uses, waste transfer sites and civic amenity sites, highlighting that they will be protected from alternative non-waste use in line with 2011 London Plan policy,
- The third paragraph has been transferred from Policy 2 with minor wording changes for clarification so that it relates to existing waste sites only.

11. The revised version of WLWP Policy 2 differs from the approved version in the following ways:

- As above, some of the content has been transferred, with amendments to Policy 1
- Two additional bullet points have been added to safeguard the local community from adverse cumulative impacts and to note the need for compliance with WLWP Policy 3 which details the development management criteria that all six boroughs will take into account when considering applications for new waste uses.

12. Following an advisory meeting held with Planning Inspector Andrew Mead in May 2013 on the draft Plan and his recommendations, officers propose minor changes to WLWP Policy 1 and WLWP 2 for clarification purposes, such as numbering rather than bulleting points within the policies.

13. The Inspector also advised that a new WLWP Policy 6 should be included, to be in conformity with the NPPF, confirming previous advice from legal officers. The wording of the new WLWP Policy 6 – National Planning Policy Framework: Presumption in Favour of Sustainable Development can be found at Appendix 2.

Changes to Chapter 4: Future Waste Management

14. Following discussions with officers, the GLA has agreed that a higher figure of 65,000 tonnes per annum per hectare can be used to calculate waste management capacity needs. (This replaces the previous figure of 54,012 tonnes per annum per hectare). This has resulted in the need to allocate a lesser amount of land to meet the London Plan 2011 apportionment.

15. In September 2013, BPP Consulting carried out a review of existing waste capacity in the Plan area due to the age of the data in the draft Plan. This work took into account changes to licensed capacity and throughput in existing and new waste management facilities as well as waste operations that might have shut down since the original waste capacity assessment was completed in 2010.

16. Verifying their method and results with the Environment Agency, BPP Consulting found the existing waste capacity in West London to be approximately 1.65 million tonnes per annum (tpa) compared to the previous figure of 900,000 tpa. This means that the

West London area has enough existing capacity to meet the London Plan apportionment up to 2017 through existing waste management sites.

17. From 2018, the apportionment gap and additional land needed to meet key apportionment targets in the London Plan 2011 will be:

- 162,000 tpa by 2021 corresponding to 2.5 hectares
- 383,000 tpa by 2026 corresponding to 5.9 hectares
- 614,000 tpa by 2031 corresponding to 9.4 hectares

The above amounts were calculated using the figure of 65,000 tpa per hectare as agreed by the GLA.

Changes to sites identified in the Plan

18. The main changes to the sites in the draft Plan since November 2011 are:

- a) loss of three sites: Victoria Road Transfer Station, Hillingdon; Transport Avenue Waste Transfer Station, Hounslow; and Yeading Brook, Bulls Bridge, Hillingdon
- b) revised boundaries of Forward Drive, Harrow, Twickenham Depot, Richmond and Greenford Depot and Greenford Reuse & Recycling Site, Ealing
- c) inclusion of one site: Rigby Lane Waste Transfer Station, Hillingdon

Details of the reasons behind these changes to sites are contained in Appendix 3.

HS2 Safeguarding Direction

19. A further issue to take note of is the HS2 Safeguarding Direction issued by the Secretary of State on 24 October 2013. The site affected by this is the Quattro Site in Park Royal, Ealing (Site 328), which is an existing waste site.

20. Following meetings with HS2 Ltd and LB Ealing, it has been agreed that the Quattro Site will be allocated in the Plan for future waste uses up to 2017 should the HS2 project commence. If the HS2 project commences, the site will only be available after HS2 has finished using the site and cleared it, estimated to be at the beginning of 2024. Should the site not be required by HS2, the site will remain allocated as an existing waste site for future reorientation.

Meeting the apportionment gap up to 2031

21. With the recalculation of existing capacity within the West London area, the additional amount of land required to meet the apportionment gap up to 2031 has been calculated as 9.4 hectares (to manage 614,000 tpa).

22. Excluding the HS2 safeguarded site, the amount of additional land available in existing sites allocated for future reorientation is 9.5 hectares, which is just enough to fill the predicted apportionment gap in 2031. Additional land totalling 5.03 hectares is also

available through two additional non-waste sites. Inclusion of the HS2 safeguarded Quattro Site at 0.94 hectares gives further contingency post 2024. In total, 14.53 hectares will be available without the HS2 safeguarded site, which is sufficient to meet the apportionment target for 2031 and makes some provision for management of waste beyond the apportionment target as is stipulated by national guidance (PPS10).

Other statutory documents

23. The Sustainability Appraisal has been updated and an Equalities Impact Assessment has also been undertaken for the proposed policies and both will be published as part of the Proposed Submission consultation documents.

Next Steps

24. The other five West London boroughs are all in the process of securing the requisite formal approvals to ensure that the approved version of the WLWP Proposed Submission Draft is identical in order to go out on public consultation. Once all six boroughs have approved the Draft Proposed Submission Version of the WLWP, the remaining timetable for its preparation will involve:

- a) a statutory six-week period seeking representations on soundness (and legality) to take place across the six boroughs during March – April 2014.
- b) assessment of representations and any further work to support the Plan prior to its submission to the Secretary of State for formal examination.
- c) submission of the Plan to the Secretary of State in April or May 2014.

25. Officers anticipate that an Examination in Public will be held during Summer 2014 and that the WLWP will be adopted by the six boroughs as part of their respective Local Plans in Spring 2015.

Financial Implications

Hillingdon is the lead borough for the preparation of the joint West London Waste Plan on behalf of the six west London boroughs covered by the plan. Hillingdon incurs the costs of managing and co-ordinating the development plan process and undertaking necessary consultation across the west London area. These costs are shared equally between the six partner boroughs under a previously agreed protocol and Hillingdon's share of the cost of undertaking the next public consultation stage on the draft WLWP will be met from the existing planning policy budget.

Likewise, once the draft WLWP reaches an Examination in Public, the costs for this payable to the Planning Inspectorate will be shared equally between the six boroughs and Hillingdon's share will be met from existing earmarked reserves and the corporate contingency allocation for developing the Local Plan included in the 2013/14 budget.

4. EFFECT ON RESIDENTS, SERVICE USERS & COMMUNITIES

What will be the effect of the recommendation?

The WLWP will form part of the Local Plans of the six partner west London boroughs and will provide a planning framework for sustainable waste development for the next 15 years. Planning applications for any new waste management facilities will be considered in the light of the WLWP policies, and they will also be assessed by the relevant council against the individual borough's Local Plan, including its local development management policies and any other material considerations. The WLWP therefore has the potential to have a significant impact, both short term and long term, upon residents, businesses, service users and potentially all members of Hillingdon's communities.

Consultation Carried Out or Required

The preparation of the WLWP has involved the close and active involvement of the west London borough partners and involved widespread consultation across the six partner boroughs. As outlined above, further consultation is to be held on a Draft Proposed Submission Version of the Plan across the six boroughs during this summer.

5. CORPORATE IMPLICATIONS

Corporate Finance

Corporate Finance has reviewed this report and concurs with the financial implications set out above, noting that Hillingdon's share of costs associated with the preparation of the West London Waste Plan are to be contained within existing resources. Any material financial implications of potential new waste management sites within the Borough will be factored into the Council's Medium Term Financial Forecast as necessary.

Legal

Section 15 of the Planning & Compulsory Purchase Act 2004 places a statutory duty on the Council to prepare and maintain a Local Development Scheme ("the Scheme"). The Scheme will specify those documents that are Development Plan Documents. Regulation 5 of the Town and Country Planning (Local Planning) (England) Regulations 2012 states that any document which includes a site allocation policy (such as the draft West London Waste Plan: Proposed Sites and Policies) will be a Development Plan Document. Section 28(1) of the Planning and Compulsory Purchase Act 2004 states that two or more local planning authorities may agree to prepare one or more joint local development documents as is the case with the West London Waste Plan. Section 33A of the Planning & Compulsory Purchase Act 2004 (as amended) requires local authorities to cooperate with each other in order to maximize the effectiveness of Development Plan Documents.

This report indicates that the Council has engaged in this process with other waste authorities that may be affected by the West London Waste Plan, if it is adopted.

When preparing the draft West London Waste Plan, the Local Planning Authority must comply with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012. The West London Waste Plan must be in conformity with the NPPF and the London Plan. The Town and Country Planning (Local Planning) (England)

Regulations 2012 requires the Council to publish a draft of the West London Waste Plan before that draft is submitted to the Secretary of State for examination in public. The method of publication and the time period for consultation is a matter for the Council to decide upon, but it must be sufficient to enable full and fair public participation and must be in compliance with the Council's Statement of Community Involvement. The Council must consider any representations in deciding whether to formally submit the plan for examination in public. Any representations received must be reported to the examination in public.

Following examination in public, the appointed inspector will decide whether the plan is sound. If the document is found to be sound, the plan will need to be put before full Council in order for it to be formally adopted. Once formally adopted by the Council, any planning applications must be determined in accordance with the Development Plan (which will at that point include the West London Waste Plan) unless material planning consideration indicates otherwise.

Corporate Property and Construction

Corporate Property and Construction supports the recommendations made in the report.

6. BACKGROUND PAPERS

Cabinet Report on 24 November 2011: Draft West London Waste Plan - Proposed Submission Stage

APPENDIX 1:

CHANGES TO WEST LONDON WASTE PLAN POLICIES WLWP 1 AND 2

Previously Approved Version of the Policies

WLWP Policy 1 – Safeguarding and Protection of Existing and Allocated Sites

Land accommodating existing waste management and waste transfer uses in west London will be safeguarded for continued use for waste facilities (Appendix 4 Table 4-1 and 4-2). Sites in Appendix 5 Table 5-1 are also allocated for waste use. Development for non-waste uses will not be considered on the land identified in these three tables unless compensatory and equal provision of sites for waste, in scale and quality, is made elsewhere within the west London Boroughs.

WLWP Policy 2 – Location of Waste Development

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

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

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

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

Revised Version of the Policies – including suggestions made by Inspector Andrew Mead

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 redevelopment to 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 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.

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:

1. 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;
2. 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
3. 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
4. The proposed site meets the criteria set out in policy WLWP3.

APPENDIX 2:

ADDITIONAL POLICY: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

The Government expects a policy to be included in all development plan documents to ensure implementation of the presumption in favour of sustainable development contained in the National Planning Policy Framework. WLWP Policy 5 is taken directly from advice provided by PINS.

The new policy reads as follows:

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:

1. 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
2. Specific policies in the NPPF indicate that development should be restricted.

APPENDIX 3:

a) Existing Sites

Existing sites in draft Plan approved by Cabinet in November 2011

Site Number	Site Area (ha)	Borough	Description	Site Type
352	1.46	Brent	Twyford Waste Transfer Station	Existing
1261	2.71	Brent	Veolia Transfer Station, Marsh Road	Existing
309	1.15	Ealing	Greenford Reuse & Recycling Site, Greenford	Existing
310	0.94	Ealing	Greenford Depot, Greenford Road, Greenford	Existing
328	2.10	Ealing	Quattro, Victoria Road, Park Royal	Existing
303	4.25	Hillingdon	Victoria Road Transfer Station	Existing
353	3.11	Hounslow	Transport Avenue Waste Transfer Station	Existing
342	3.67	Richmond	Twickenham Depot	Existing
Total	19.39			

Revised list of sites for draft Submission Version of Plan, January 2014

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

* These sites are contiguous and for the purposes of this Plan are considered as a single, consolidated site

This site will not be available from 2017 to 2024 following an HS2 Safeguarding Direction

b) Proposed new sites

Proposed New Sites in Plan approved by Cabinet in November 2011

Site Number	Site Area (ha)	Borough	Description	Site Type
222	2.83	Harrow	Council depot, Forward Drive	Proposed
244	3.12	Hillingdon	Yeading Brook, Bulls Bridge	Proposed
2861	3.20	Hounslow	Western International Market	Proposed
Total	9.15			

Revised list of Existing Sites for draft Submission Version Plan, January 2014

Site Number	Site Area (ha)	Borough	Description	Type
222	1.83	Harrow	Council depot, Forward Drive	Proposed
2861	3.20	Hounslow	Western International Market	Proposed
Total	5.03			

Details of changes to identified sites

1. The WLWP Proposed Submission Draft previously approved by the Cabinet included 8 existing sites totalling 19.39 hectares and 3 new sites totalling 9.15 hectares, which amounted to a total of 28.54 hectares. At the time, sufficient land had been identified for waste management facilities to ensure that the London Plan (2011) apportionment could be met up to 2026.
2. Re-appraisal of the existing and new sites has been undertaken by the boroughs as part of work for the Sustainability Appraisal accompanying the WLWP Proposed Submission Draft. Following discussions between the boroughs, amended designations of the following sites has resulted in a reduced area for each site:
 - Council Depot, Forward Drive site (Site 222) - London Borough of Harrow from 2.83 ha to 1.83 ha
 - Twickenham Depot (Site 342) - London Borough of Richmond from 3.67 ha to 2.67 ha
 - Combined Greenford Depot and Greenford Reuse & Recycling sites (Sites 309 & 310) - London Borough of Ealing from 2.09 ha to 1.78 ha.
4. LB Ealing suggested that two of their existing safeguarded sites, Greenford Reuse & Recycling Site and Greenford Depot be consolidated as they are located next to each other and form part of a larger site. Previously they were divided because each part has a separate licence from the Environment Agency. Combined, the sites total 1.78 hectares. The above values take account of this consolidated and reduced area.
5. The three sites that have been 'deleted' since the approved Proposed Submission Draft are:
 - Victoria Road Transfer Station (Site 303) – London Borough of Hillingdon
 - Transport Avenue Waste Transfer Station (Site 353) – London Borough of Hounslow
 - Yeading Brook, Bulls Bridge (Site 244) – London Borough of Hillingdon
6. Victoria Road and Transport Avenue are both owned by SITA UK. Both sites are now required for waste transfer (rather than treatment) following the decision by the West London Waste Authority to award SITA UK a long term contract to manage West London's residual household waste. Parts of the sites will still be providing recycling and composting facilities which will count toward the London Plan 2011 apportionment.
7. The Bulls Bridge site in Hillingdon has now been granted planning approval for an aggregates processing development.
8. Officers identified Rigby Lane Transfer Station, Hillingdon (Site 331), originally included in the "Proposed Sites and Policies" Consultation document, as an additional site to be allocated for future waste management in light of the loss of three sites discussed above. Rigby Lane is an existing facility which has been used as a waste facility for more

than two decades. It is currently owned by SITA UK, who recently submitted a planning application to re-orientate the site following the loss of 0.01 ha to Crossrail safeguarding. The site is 0.88 hectares in size.

9. The number of “existing” sites is now six, totalling 10.44 hectares and there are two “new” sites totalling 5.03 hectares, which amount to a combined total of 15.47 hectares of land available through safeguarding for future waste management. This means that there is a surplus capacity of 6.07 hectares identified for West London when measured against the projected London Plan 2031 apportionment target of 614,000 tonnes per annum. Therefore no further site assessments need to be undertaken prior to the WLWP Proposed Submission Draft being published for consultation.

10. In summary the changes to sites are as follows:

Sites with reduced areas

- Site 222, Council Depot, Forward Drive – LB Harrow – 1.83 hectares
- Site 342, Twickenham Depot – LB Richmond – 2.67 hectares
- Consolidated Site 309 & Site 310, Greenford Depot and Greenford Reuse & Recycling Site – LB Ealing – 1.78 hectares

Existing Sites no longer available for inclusion:

- Site 303, Victoria Road Transfer Station, LB Hillingdon – 4.25 hectares
- Site 353, Transport Avenue Waste Transfer Station, LB Hounslow – 3.11 hectares

New Site no longer available for inclusion:

- Site 244, Bulls Bridge, Yeading Brook, LB Hillingdon – 3.12 hectares

Additional (replacement) site:

- Site 331, Rigby Lane Transfer Station, LB Hillingdon – 0.88 hectares (existing site)

APPENDIX 4:

**WEST LONDON WASTE PLAN – AMENDED DRAFT PROPOSED SUBMISSION
VERSION, 2013**