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

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

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

**Date: 16<sup>th</sup> March 2015**

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**PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)**

**SECTION 20**

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

Document submitted for examination on 30 July 2014

Examination hearings held between 7 and 10 October 2014

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## **ABBREVIATIONS USED IN REPORT**

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

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

## **Non-Technical Summary**

This report concludes that the West London Waste Plan provides an appropriate basis for waste planning in the west London boroughs<sup>1</sup> over the next 17 years providing a number of modifications are made to the Plan. The borough councils have specifically requested me to recommend any modifications necessary to enable the Plan to be adopted. All of the modifications to address this were proposed by the boroughs and I have recommended their inclusion after considering the representations from other parties on these issues.

The principal main modifications can be summarised as follows:

- adding reference to superseded policies;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

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

## Introduction

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

## Assessment of Duty to Co-operate

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

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<sup>2</sup> See PMM7

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

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

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

## **Assessment of Legal Compliance**

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

### **Local Development Schemes**

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

### **Spatial Development Strategy**

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

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

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

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

### **Superseded Policies**

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

### **Inviting Representations**

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

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<sup>5</sup> See ED34; also ED35

<sup>6</sup> Regulation 18(2)(c)

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

### **Sustainability Appraisal**

18. The relevant Sustainability Appraisal is set out in the document "Proposed submission plan - Sustainability appraisal: pre-submission version" (SD9). This has been criticised for reasons that include:

- § a failure to properly consider negative effects on adjoining land uses and Green Belt issues;
- § a failure to consider alternative sites; and
- § a failure to make provision for waste development in a sustainable way.

19. For my part, I consider it sensible to concentrate on the sites that are deemed to be appropriate and reasonable. Deliverable sites are appraised in Section 6 of the Appraisal with an assessment against 27 headings. I would not expect any general assessment against Green Belt matters bearing in mind that Green Belt sites were excluded at the site selection stage. However, the inclusion of relevant comments would have been informative where, for example, there were issues concerning adjacent Green Belt. With regard to negative effects on adjoining business land uses, I was told that these could be recorded against "Local Employment".

20. The "failure" to make provision for waste development in a sustainable way essentially refers to a concern that alternative sites for anaerobic digestion and the production of energy have not received adequate attention. However, as discussed below, I consider that the allocated sites could accommodate an adequate range of waste management developments.

21. I appreciate that, in the light of current knowledge, it would have been helpful to record in particular the presence of sensitive land uses where adjacent to sites proposed for allocation. However, I do not find that the conclusions of the boroughs are significantly flawed. The sustainability appraisal is part of an overall assessment of the environmental effects of the West London Waste Plan. Even if some of the comments were varied to reflect up-to-date circumstances, I do not consider that the conclusions of the exercise would be materially different. I conclude that the sustainability appraisal is adequate.

### **National Policy**

22. Shortly after the final adjournment of the examination hearings, the Government published replacement planning policy on waste.<sup>7</sup> At the same time, updated guidance was added to Planning Practice Guidance. The West London boroughs subsequently produced a Statement of Consistency on the matter (PMM5). The consultation version of the emerging policy<sup>8</sup> was before the hearings and was referred to as appropriate. However, views on the new

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<sup>7</sup> National Planning Policy for Waste, Department for Communities and Local Government, October 2014

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

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

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

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

## Assessment of Soundness

### Preamble

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



- § details the estimated amounts of the different types of waste that will be produced in west London over the Plan period;
  - § identifies and protects sites that currently deal with waste;
  - § identifies the shortfall of facilities that will be needed over the life of the Plan; and
  - § allocates sites that it is envisaged will meet the shortfall.
25. One of the key tasks is to meet the apportionment set out in the London Plan (2011). As such, over the plan period, there is a need for about 614,000 tonnes of additional annual capacity in the municipal solid waste and commercial and industrial waste categories.
26. The sites allocated in the Proposed submission plan include what are stated to be seven existing waste sites. Here it is envisaged that substantial new capacity would be generated through part or complete redevelopment. In addition, there are two sites (not existing waste sites) that are allocated for waste development.
27. In considering the soundness of the Plan, I have had regard to Government policy and guidance. This includes the National Planning Policy Framework, National Planning Policy for Waste and the Waste Management Plan for England. In addition, certain provisions of the Waste Framework Directive<sup>9</sup> are relevant. Article 34 of the Directive concerns inspections. This has been implemented in Part 6 of the Waste (England and Wales) Regulations 2011. However, specific reference would be included within the West London Waste Plan under main modification **MM21B**.
28. Specific waste policies are set out in the document National Planning Policy for Waste rather than in the National Planning Policy Framework. However, other policies in the Framework are relevant to the content of local plans. In particular, when testing soundness, it is necessary to consider whether the Plan has been "positively prepared".
29. For my part, I find that the West London Waste Plan has been positively prepared. An assessment of waste arisings in West London has been undertaken and the results are set out in the Data Compendium report (EB59). This report has been taken into account in formulating the approach to the future management of waste in West London as well as the management of imports.
30. Section 4 of the Plan specifically considers how much waste will need to be managed in west London and how much capacity will be needed. In response to this information, the Plan sets out a strategy of safeguarding existing sites and specifically allocating sites for waste management purposes thus providing the capacity that will be needed to meet the London Plan (2011) apportionment.
31. A presumption in favour of sustainable development is set out in WLWP Policy 6 of the Plan. This confirms that the boroughs will take a positive

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

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

## **Main Issues**

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

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

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

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

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

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

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

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

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

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

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

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

### ***Hazardous Waste***

41. Hazardous waste is one of the types of waste for which waste planning authorities should plan for sustainable management. Section 3.5 of the Plan discusses the existing management of hazardous waste. However, this is lacking in detail. Some of the key facts are that just over 88,000 tonnes of hazardous waste was produced in west London in 2012 of which about 85% was exported. At the same time imports amounted to some 20,000 tonnes. Overall, the Plan area achieved 40% net self-sufficiency.
42. The topic is also one that is addressed in the London Plan (2011). It is noted that the Mayor will prepare a Hazardous Waste Strategy for London<sup>10</sup> and that London as a whole will require more and better waste treatment facilities. Without sustained action there remains the risk of a major shortfall in the capital's capacity. There is a need to continue to identify hazardous waste

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

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

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

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

#### ***New Waste Management Capacity***

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

### ***Safeguarding and Protection of Existing and Allocated Waste Sites***

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

### ***Location of Waste Development***

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

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

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

### ***Ensuring High Quality Development***

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

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

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

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

### ***Decentralised Energy***

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

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

### ***Sustainable Site Waste Management***

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

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

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

### ***Non-Apportioned Capacity Gap***

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

### ***Meeting the London Apportionment***

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



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

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

### ***Harlington Quarry***

69. The Harlington Quarry site lies in the Green Belt south of the M4 motorway and generally to the northeast of Heathrow Airport. The site area is 2.59 ha. Representors envisage that an anaerobic digestion biogas plant would be erected on the site. This would be designed to process 49,500 tonnes of food waste a year sourced from within west London. Allocation of the site within the West London Waste Plan is sought although planning permission for a project specific proposal was refused by notice dated 30 October 2014.<sup>11</sup>
70. In terms of potential allocation of the site, I start by recognising that development of the nature proposed would represent inappropriate development in the Green Belt. In this regard, national policy states that waste planning authorities should first look for suitable sites and areas outside the Green Belt.<sup>12</sup>
71. The representors have carried out an extensive search for potential sites. They have been looking for a site of some 2 ha and have dismissed smaller sites such as the Greenford Depot site (1.78 ha) and Twyford Waste Transfer Station (1.24 ha). The Western International Market site was dismissed principally because it was deemed to be unavailable.
72. For my part, I do not accept that smaller sites could not house an anaerobic digestion facility. The research study "Planning for Waste Management Facilities" points to sites with a typical area of 0.6 ha in the context of a development with a throughput of 40,000 tonnes a year.<sup>13</sup> In addition, the West London Waste Authority is considering the suitability of the Twyford site for a facility with a capacity of 50,000 tonnes a year (ED29, Para 2.3). With regard to the Western International Market site, this was confirmed as available at the examination hearings.

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

<sup>12</sup> National Planning Policy for Waste, Para 6

<sup>13</sup> Office of the Deputy Prime Minister, August 2004, Page 80

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

### **Tavistock Road**

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

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

## **Conclusions**

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

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

#### **Preliminary Points**

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

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

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

#### *Existing waste management sites as proposed for allocation*

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

#### *Additional site allocated in the Plan for waste management uses*

Western International Market

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

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

### ***Capacity Assumptions***

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

### ***Twyford Waste Transfer Station***

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

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

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

### ***Western International Market***

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

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

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

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

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

**Overall Conclusion and Recommendation**

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

*Andrew S Freeman*

INSPECTOR

This report is accompanied by the Appendix containing the main modifications

## Appendix A – Main Modifications

### ***Key to the Schedule of Main Modifications:***

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

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

Ref. No.	Page	Policy/ Paragraph	Main Modification																																					
MM1	Throughout Plan	Throughout Plan	Reference to the combined total area of sites allocated in the Plan changed from '15.24'ha to '15.52'ha																																					
	Pages ii and iii	Table i and ii	<p>Modifications made to reflect those made to tables 5-1 and 5-2</p> <p><i>Table i: Existing waste sites proposed for allocation</i></p> <table border="1"> <thead> <tr> <th>Site Number</th> <th>Name</th> <th>Site Area (ha)</th> <th>Borough</th> </tr> </thead> <tbody> <tr> <td>352</td> <td>Twyford Waste Transfer Station</td> <td>1.24</td> <td>Brent</td> </tr> <tr> <td>1261</td> <td>Veolia Transfer Station, Marsh Road</td> <td>2.71</td> <td>Brent</td> </tr> <tr> <td>309*</td> <td>Greenford Reuse &amp; Recycling Site</td> <td rowspan="2">1.78</td> <td rowspan="2">Ealing</td> </tr> <tr> <td>310*</td> <td>Greenford Depot, Greenford Road</td> </tr> <tr> <td>328#</td> <td>Quattro, Victoria Road, Park Royal</td> <td><del>0.97</del> 0.7</td> <td>Ealing</td> </tr> <tr> <td><b>222</b></td> <td><b>Council Depot, Forward Drive</b></td> <td><b>2.31</b></td> <td><b>Harrow</b></td> </tr> <tr> <td>331</td> <td>Rigby Lane Waste Transfer Station</td> <td><del>0.91</del><sup>84</sup></td> <td>Hillingdon</td> </tr> <tr> <td>342</td> <td>Twickenham Depot</td> <td>2.67</td> <td>Richmond</td> </tr> <tr> <td><b>Total</b></td> <td></td> <td><del>10.21</del> <b>12.32</b></td> <td></td> </tr> </tbody> </table> <p>*These two sites are contiguous and part of a larger site: for the purposes of the Plan, they are considered as a single, consolidated site  # This site is subject to a High Speed 2 (HS2) Safeguarding Direction and will not be available from 2017 until 2024</p> <p><i>Table ii: Additional sites identified allocated in the Plan for waste management uses</i></p>	Site Number	Name	Site Area (ha)	Borough	352	Twyford Waste Transfer Station	1.24	Brent	1261	Veolia Transfer Station, Marsh Road	2.71	Brent	309*	Greenford Reuse & Recycling Site	1.78	Ealing	310*	Greenford Depot, Greenford Road	328#	Quattro, Victoria Road, Park Royal	<del>0.97</del> 0.7	Ealing	<b>222</b>	<b>Council Depot, Forward Drive</b>	<b>2.31</b>	<b>Harrow</b>	331	Rigby Lane Waste Transfer Station	<del>0.91</del> <sup>84</sup>	Hillingdon	342	Twickenham Depot	2.67	Richmond	<b>Total</b>		<del>10.21</del> <b>12.32</b>
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Site Number	Name	Site Area (ha)	Borough
222	Council Depot, Forward Drive	1.83	Harrow
2861	Western International Market	3.20	Hounslow
<b>Total</b>		<b>5.03</b> <del>3.20</del>	

Combined Total Area = 15.24 ~~52~~ hectares

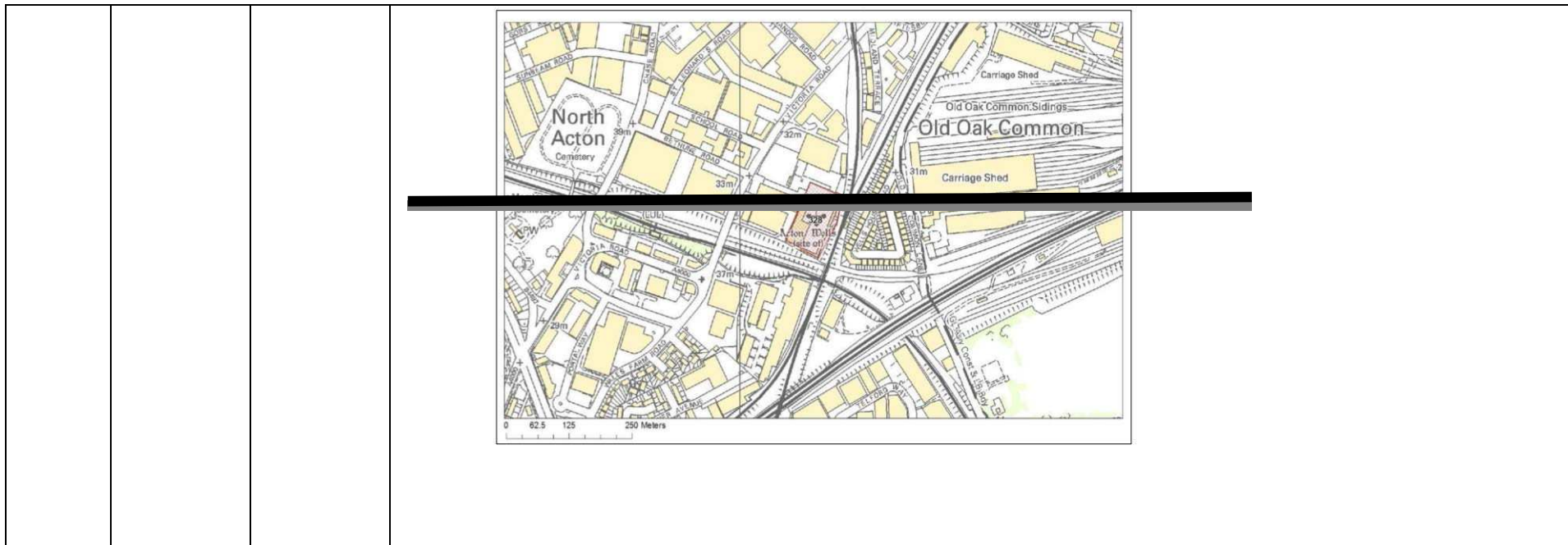
MM1A	Page 3	1.2.3	After “The West London Waste Plan will form part of the Development Plan for each of the boroughs.” Insert new sentence: <i>This Plan supersedes certain policies in other Borough Development Plan Documents as set out in Appendix 7.</i>
MM1B	Page 3	1.3.1	Add new sentence:  <i>The Plan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

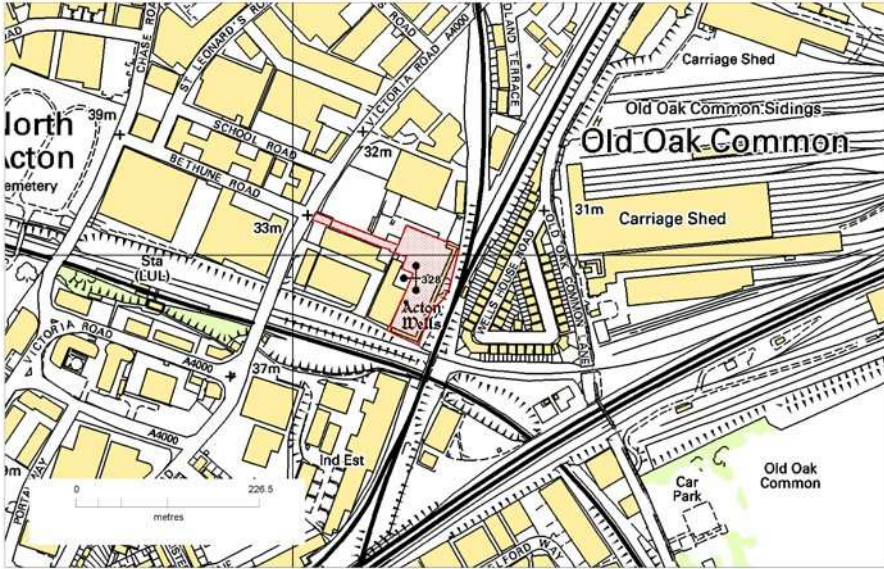
MM1BB	Page 5	1.3.6	<p><b>National Planning Policy for Waste</b> <b>Statement 10</b></p> <p>1.3.6 <b>National Planning Policy for Waste</b> <b>Statement 10: Planning for Sustainable Waste Management</b><sup>4</sup> sets out national objectives and guidance to be considered when producing planning policies for waste development and consideration of applications for waste development. <b>The Government intends to update this policy.</b></p> <p>Change to related footnote:</p> <p><sup>4</sup> <b>National Planning Policy for Waste, October 2014</b> <a href="https://www.gov.uk/government/publications/national-planning-policy-for-waste">https://www.gov.uk/government/publications/national-planning-policy-for-waste</a> <b>Planning Policy Statement 10, revised March 2011 -</b> <a href="http://www.communities.gov.uk/documents/planningandbuilding/pdf/18/6202.pdf">http://www.communities.gov.uk/documents/planningandbuilding/pdf/18/6202.pdf</a></p>
MM1C	Page 13	West London Waste Plan Vision	<p><b>By</b> <b>Over the period to 2031</b>, the West London Waste Plan area will have made provision for enough waste management facilities <b>of the right type and</b> in the right locations to provide for the sustainable management of waste <b>guided by the waste hierarchy to achieve net self-sufficiency and meet the needs of local communities</b>. It will seek to do so, <b>in a progressive manner</b>, whilst protecting the environment, stimulating the economy and balancing the needs of West London's communities.</p>
MM1D	Page 13	West London Waste Plan Strategic Objectives 1	<p>To identify sufficient land for the management of the six boroughs' pooled waste apportionment as set out in the London Plan (2011), including safeguarding existing waste sites and maximising their use as waste management sites <b>and to provide for the sustainable management of an amount of waste equivalent to the amount arising within the Plan Area.</b></p>
MM1E	Page 20	3.5.1	<p><b>Hazardous Wastes</b></p> <p>Hazardous wastes are categorised as those that are harmful to human health, or the environment, either immediately or over an extended period of time. They range from asbestos, chemicals, and oil through to electrical goods and certain types of healthcare waste. <b>A detailed study of arisings<sup>18</sup> has been undertaken which found the following:</b></p> <ul style="list-style-type: none"> <li>In 2012, West London produced just under 100 <b>over 88</b>,000 tonnes of which approximately <b>87.5</b>% was exported for management.</li> </ul>

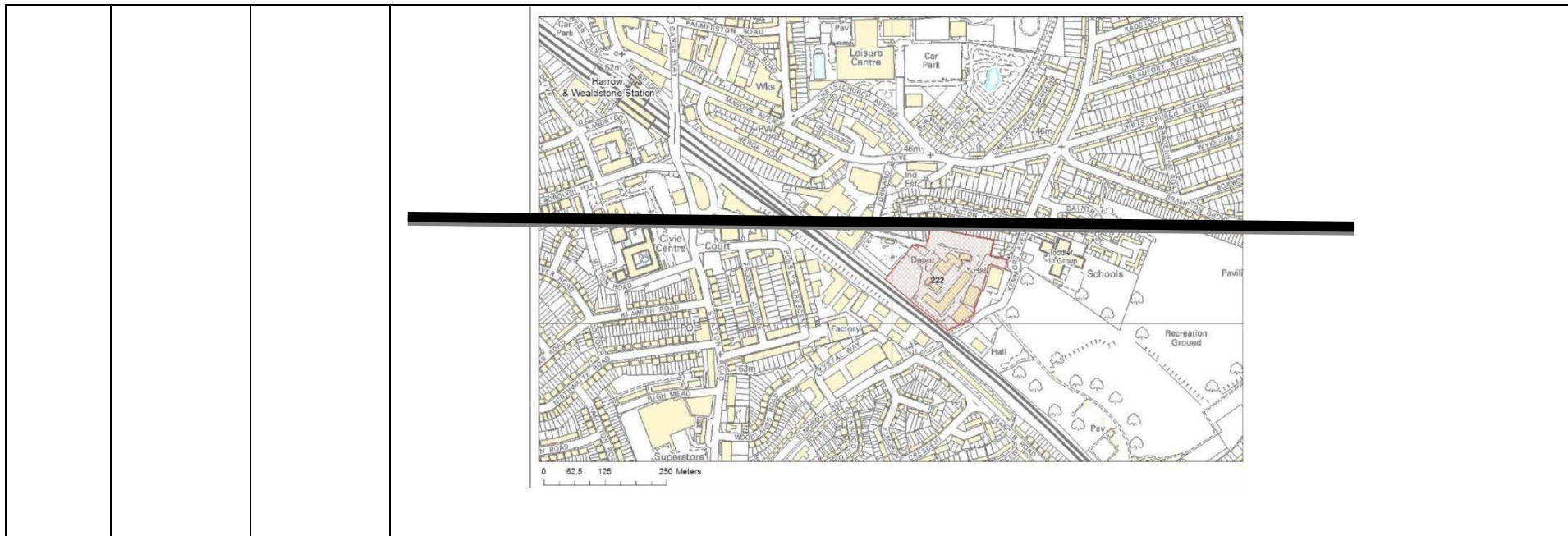
			<ul style="list-style-type: none"> <li>• <i>At the same time 20,000 tonnes was imported from outside the Plan area.</i></li> <li>• <i>Overall the Plan Area achieved 40% net self sufficiency in 2012. Compared with other waste streams generated in West London,</i></li> </ul> <p><i>Hazardous waste is not a large waste stream, but does requires a range of specialist facilities for treatment and disposal, but it is not anticipated that substantial additional need for new capacity locally will arise and so land allocations specifically for the development of additional hazardous waste management capacity have not been identified in this Plan.</i></p> <p>Insert related footnote:</p> <p><i><sup>18</sup>Estimate of Baseline, Forecast, Management &amp; Flows for Hazardous Waste Arising in west London Final issue v1.0 27.02.14, BPP Consulting</i></p>
MM1F	Page 28	4.4.1	<p><i>Construction, Demolition and Excavation (CD &amp; E) waste is a large waste stream within London, although it is not included within the London Plan (2011) apportionment target assigned to boroughs. Work undertaken in support of the Plan has established that the Plan Area has a substantial quantity of processing capacity for this waste stream and that the London Plan (2011) city-wide targets of 95% recycling and reuse by 2020 are close to being met. This is expected to continue into the future and accordingly no allocations are made in this plan for facilities dealing specifically with such wastes. However the evidence also indicates that it is not possible for the more specific target of 80% of that recycling to be met in the form of aggregates by 2020 due to the lack of suitable waste. The preference in West London is to ensure more on-site recycling and re-use on construction sites together with effective use of existing waste management sites and the appropriate provision of facilities at mineral extraction sites to ensure adequate provision of treatment capacity for this waste stream. Particular policy encouragement will be given to development of capacity for the production of material suitable for use as substitutes for virgin materials such as recycled aggregates.</i></p>
MM1G	Page 29	4.5.2	<p>Work undertaken in support of the Plan<sup>25</sup> has established that the Plan area has a moderate level of capacity for this waste stream with a number of sites managing hazardous waste within the Plan area. Other flows have been tracked</p>

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



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





MM3B	<p>Throughout Plan</p> <p>Page 43</p>	<p>All policies</p> <p>New policy WLWP 1</p>	<p>Policy numbers to change in light of insertion of new policy WLWP1</p> <p>Insert the following new paragraphs and Policy WLWP1:</p> <p><b>Policy WLWP 1 - Provision of New Waste Management Capacity</b></p>

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

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

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

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

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

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



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

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

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

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

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

## **Appendix 6: Descriptions of Allocated Sites**

### **[MM24]**

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

#### **General Information**

##### **Suitable waste management technologies**

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

#### **Land Contamination**

*Each allocated site is located on previously developed land but no investigation has been carried out to establish whether the ground itself is contaminated<sup>37</sup>. Redevelopment of the sites might therefore require work to decontaminate the sites.*

#### **Setting Back from Rivers**

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

#### **Air Quality Management Areas**

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

#### **Waste Input tonnages**

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

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

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



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

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

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

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

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

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

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

<b>Ecology/HRA</b>	<i>Site is within 250m of a SINC designated in the Ealing Local Plan which is of Grade 1 Borough Importance. It forms part of the much larger 'Brent River Park: Hanger Lane to Greenford Line' SINC (site 15/EaB114A).</i>
<b>Flood Risk/Water Protection</b>	<i>Southern boundary is adjacent to the River Brent</i>
<b>Green Belt</b>	<i>The site is not in or near Green Belt</i>
<b>Landscape/Visual Impact</b>	<p><i>The site is level with the surrounding area. Existing buildings on the site are between 10 and 18 metres high which is in keeping with heights of buildings on adjacent land.</i></p> <p><i>Distant views from the north would be across the open Alperton Sports Ground.</i></p> <p><i>Views from the east would be from Marsh Lane and would be obscured by light industrial units.</i></p> <p><i>Views from the south would be from low and high rise office space with views from the residential area obscured by the railway embankment.</i></p>
<b>Public Rights of Way</b>	<i>The pedestrian pavement of Alperton Lane runs adjacent to the site's northern boundary.</i>
<b>Key Development Criteria</b>	
<b>Archaeology</b>	<i>Proposals should be supported by a desk-based assessment unless agreed with English Heritage</i>
<b>Flood Risk/Water Protection</b>	<i>The site is greater than 1ha and so a flood risk assessment that focuses on the management of surface water run-off will be required. The Environment Agency advises a setback of a minimum of 8 metres from the top of the bank of the River Brent must be incorporated into re-development proposals. The site boundary is itself over 8 metres from the bank.</i>
<b>Visual amenity</b>	<i>Careful attention would be needed to avoid adverse impact on sensitive receptors including the sports fields to the north of the site.</i>
<b>Access</b>	<i>Any redevelopment would need to pay particular attention to impacts on Marsh Lane which can be constricted due to vehicles parking on this highway.</i>



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

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

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

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

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

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

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

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

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



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

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

**London Borough of Brent**

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

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

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

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

**London Borough of Ealing**

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

**London Borough of Harrow**

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

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

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

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

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

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

**London Borough of Hillingdon**

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

**London Borough of Hounslow**

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

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

**London Borough of Richmond**

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

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