

Report of the Head of Planning, Transportation and Regeneration

Address OLD COAL DEPOT TAVISTOCK ROAD YIEWSLEY

Development: Change of use to provide a Civic Amenity Site (part retrospective) accommodating public recycling area with circular route and in and out access arrangement, trade waste area and storage areas with associated container storage, site and welfare offices and installation of palisade fencing and gates for a 5 year period (8:00 to 18:00 hours - Mondays to Fridays and 9:00 to 17:00 hours - Saturdays, Sundays and Bank /Public Holidays (subject to seasonal variation)).

LBH Ref Nos: 18736/APP/2018/628

Drawing Nos: 2018/D/238/P/02
2018/D/238/P/03
2018/D/238/P/01
Planning Statement
Transport Statement

Date Plans Received: 20/02/2018

Date(s) of Amendment(s):

Date Application Valid: 01/03/2018

1. **SUMMARY**

The proposal is to use part of the former Coal Yard Depot for the extension of the operation of an existing Civic Amenity Site from 28 days per year to full time operation for a temporary 5 year period (a proposal which also involves a change of use of the land). The works involve accommodating a public recycling area with a circular route and in and out access arrangements, trade waste area and storage areas with associated container storage, site and welfare offices and installation of palisade fencing and gates.

The site is currently designated as an Industrial and Business Area where waste type uses can be accommodated, subject to other development control criteria. The site is being allocated for more of a mixed use within the emerging Local Plan and it is considered that providing that the use is for a temporary period only, its temporary use as a Civic Amenity site would not conflict with the emerging plan.

The application is considered to be acceptable in terms of its traffic impacts and would not result in any significant adverse impacts for surrounding residents, given the industrial nature of the site and the separation distances involved.

It is recommended for approval.

2. **RECOMMENDATION**

APPROVAL subject to the following:

1 NONSC **Temporary Time Limit**

The use of the Civic Amenity Site hereby permitted shall be discontinued and the land restored to its former condition on or before five years from the date of this permission, in accordance with a scheme of work submitted to and approved by the Local Planning

Authority.

REASON

In order to comply with the terms of the application and in order to accord with the emerging Site Allocations and Designations of the Hillingdon Local Plan.

2 NONSC Waste Limit

The site shall not handle more than 48,000 tonnes of waste per annum of which no more than 10,000 tonnes can be made up of trade waste. The site shall only accept trade waste when subject to a waste transfer note and it shall not handle hazardous, agricultural, industrial, asbestos or clinical waste.

The waste throughputs shall be recorded and records be submitted to and approved in writing by the Local Planning Authority.

REASON

In order to comply with the terms of the application, to safeguard the surrounding properties from excessive levels of activity on site and in order to ensure that traffic generation does not prejudice the safe and efficient operation of the surrounding highway network, in accordance with Policies OE1, OE11 and AM7 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

3 COM4 Accordance with Approved Plans

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers 2018/D/238/P/03 and shall thereafter be retained/maintained for as long as the development remains in existence.

REASON

To ensure the development complies with the provisions Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and the London Plan (March 2016).

4 COM9 Landscaping (car parking & refuse/cycle storage)

No development shall take place until a landscape scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include: -

1. Details of Soft Landscaping

- 1.a Planting plans (at not less than a scale of 1:100),
- 1.b Written specification of planting and cultivation works to be undertaken,
- 1.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate

2. Details of Hard Landscaping

- 2.a Refuse Storage
- 2.b Cycle Storage
- 2.c Means of enclosure/boundary treatments, to include measures to prevent wind blown litter
- 2.d Car Parking Layouts (including demonstration that 10% of the spaces satisfy accessibility standards and 5% of all parking spaces are served by electrical charging points)
- 2.e Hard Surfacing Materials

4. Details of Landscape Maintenance

4.a Landscape Maintenance Schedule (to include the wooded landscape areas within the site) for a minimum period of 5 years or when the use ceases.

4.b Proposals for the replacement of any tree, shrub, or area of surfing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.

Thereafter the development shall be carried out and maintained in full accordance with the approved details.

REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with policies BE13, BE38 and AM14 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and Policy 5.17 (refuse storage) of the London Plan (March 2016)

5 COM22 Operating Hours

The premises shall not be used except between:-

08:00 and 18:00 hours, Mondays - Fridays, and

09:00 to 17:00 hours Saturdays, Sundays, Public or Bank Holidays.

No processes, machinery operated, services or deliveries shall occur outside of these hours.

REASON

To safeguard the residential amenity of the occupiers of adjoining and nearby properties in accordance with Policies OE1 and OE3 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

6 NONSC Surface Water Drainage

Prior to the commencement of development full details of the surface water drainage regime shall be submitted to and approved in writing by the Local Planning Authority. The drainage scheme needs to detail clearly the methods to prevent contaminated runoff from entering controlled waters as well as the details of discharges, including locations and rates. The development must proceed in accordance with the approved scheme.

Reason

To protect water quality in accordance with Policy EM8 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).

7 NONSC Delivery and Servicing Plan

A Delivery and Servicing Plan (DSP) shall be submitted to and be approved by the Local Planning Authority, prior to the implementation of the development hereby permitted. The plan shall be implemented as approved.

REASON

To safeguard the residential amenity of the occupiers of surrounding properties and to ensure that pedestrian and vehicular safety is not prejudiced, in compliance with Policies OE1 and AM7 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).

8 NONSC Height Limit of Stored Materials

The stockpiles of materials on site shall not exceed 3 meters in height.

REASON

To protect the visual amenities of the surrounding area and residential amenities of surrounding residential occupiers in accordance with Policies BE13 and OE1 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).

9 NONSC Signage Details

Prior to the implementation of the development hereby approved details of the warning sign to be located on Tavistock Road shall be submitted to and approved in writing by the local planning authority; and
the site shall not be occupied until the signage has been erected in accordance with the approved details.

REASON

To ensure that traffic generation does not prejudice the safe and efficient operation of the surrounding highway network, in accordance with Policies OE1, OE11 and AM7 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

INFORMATIVES

1 I52 Compulsory Informative (1)

The decision to GRANT planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

2 I53 Compulsory Informative (2)

The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Unitary Development Plan Saved Policies (September 2007) as incorporated into the Hillingdon Local Plan (2012) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan - The Spatial Development Strategy for London consolidated with alterations since 2011 (2016) and national guidance.

NPPF	National Planning Policy Framework
LPP 2.7	(2016) Outer London: Economy
LPP 2.8	(2016) Outer London: Transport
LPP 4.1	(2016) Developing London's economy
LPP 4.4	(2016) Managing Industrial Land and Premises
LPP 5.1	(2016) Climate Change Mitigation
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.3	(2016) Sustainable design and construction
LPP 5.7	(2016) Renewable energy
LPP 5.13	(2016) Sustainable drainage
LPP 5.14	(2016) Water quality and wastewater infrastructure
LPP 5.15	(2016) Water use and supplies
LPP 5.16	(2016) Waste net self-sufficiency
LPP 5.17	(2016) Waste capacity
LPP 5.18	(2016) Construction, excavation and demolition waste

LPP 6.1	(2016) Strategic Approach
LPP 6.2	(2016) Providing public transport capacity and safeguarding land for transport
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.4	(2016) Enhancing London's Transport Connectivity
LPP 6.5	(2016) Funding Crossrail and other strategically important transport infrastructure
LPP 6.11	(2016) Smoothing Traffic Flow and Tackling Congestion
LPP 6.12	(2016) Road Network Capacity
LPP 6.13	(2016) Parking
LPP 6.14	(2016) Freight
LPP 7.1	(2016) Lifetime Neighbourhoods
LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character
LPP 7.8	(2016) Heritage assets and archaeology
LPP 7.14	(2016) Improving air quality
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 8.2	(2016) Planning obligations
LPP 8.3	(2016) Community infrastructure levy
BE13	New development must harmonise with the existing street scene.
BE25	Modernisation and improvement of industrial and business areas
BE34	Proposals for development adjacent to or having a visual effect on rivers
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
OE1	Protection of the character and amenities of surrounding properties and the local area
OE3	Buildings or uses likely to cause noise annoyance - mitigation measures
OE8	Development likely to result in increased flood risk due to additional surface water run-off - requirement for attenuation measures
OE11	Development involving hazardous substances and contaminated land - requirement for ameliorative measures
LE1	Proposals for industry, warehousing and business development
LE2	Development in designated Industrial and Business Areas
AM2	Development proposals - assessment of traffic generation, impact or congestion and public transport availability and capacity
AM7	Consideration of traffic generated by proposed developments.
AM8	Priority consideration to pedestrians in the design and implementation of road construction and traffic management schemes
AM9	Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
AM13	AM13 Increasing the ease of movement for frail and elderly people and people with disabilities in development schemes through (where appropriate): - (i) Dial-a-ride and mobility bus services (ii) Shopmobility schemes (iii) Convenient parking spaces (iv) Design of road, footway, parking and pedestrian and street

	furniture schemes
AM14	New development and car parking standards.
AM15	Provision of reserved parking spaces for disabled persons
SPD-PO	Planning Obligations Supplementary Planning Document, adopted July 2008

3

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from the 'Saved' UDP 2007, Local Plan Part 1, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

4

The Environment Agency advise that the submitted planning statement states that 'the site is to be operated by London Borough of Hillingdon (LB Hillingdon) only...', however the current Environmental Permit with this application is in the name of Powerday PLC. Please note that the permit holder must be the legal operator of the site.

This means the permit holder must have 'sufficient control' of the activity or facility. You must, for example:

- Have day-to-day control of the facility or activity, including the manner and rate of operation.
- Make sure that permit conditions are complied with.
- Decide who holds important staff positions and have incompetent staff removed, if required.
- Make investment and financial decisions that affect the facility's performance or how the activity is carried out.
- Make sure your activities are controlled in an emergency.

From the application it would appear that LB Hillingdon will be the legal operator and as such the permit either needs to be transferred to them or they need to apply for their own permit for the site. More information on the legal operator can be found here: <https://www.gov.uk/guidance/legal-operator-and-competence-requirementsenvironmental-permits>

5

The applicant should consider measures to encourage the use of low emission vehicles through measures such as prioritisation of services for electric vehicles. The applicant should also consider setting restrictions on the HGVs using the facility to Euro V and Euro VI standards.

3. CONSIDERATIONS

3.1 Site and Locality

The application site is located off Tavistock Road to the west of Yiewsley town centre, and comprises part of an elevated railway yard which formerly operated as a coal yard adjacent to the Great Western Main Line. Vehicular access to the site is gained from Tavistock Road

to the east along a two way tarmac carriageway, which measures approximately 215m in length and is truncated after approximately 150m by a level rail crossing through which a single track branch line crosses which gains access from the main line further to the east. The access then crosses the Fray's River before reaching the main former coal yard depot

The 0.97 hectare, irregularly shaped application site is a relatively small plot within a complex of open storage yards on the wider former coal yard site, measuring approximately 192m x 100m at its widest points and is located in the north-east corner of the wider site, at the end of the access road. Due to the operational nature of the site, the site is almost completely covered in hardstanding with no existing vegetation apart from the wooded area along the northern boundary of the site. The existing yard areas are already contained within a mix of concrete walls and steel palisade fencing. There is an existing weighbridge sited in the south east corner of the application site with an adjoining two storey brick office building being sited just outside.

The application site is currently used to provide a Civic Amenity Site on one weekend every month whilst much of the rest of the wider former Old Coal Yard was previously used as open storage and other industrial type uses, it now appears largely vacant with some use being made for storage, including skip and waste container storage. The area to the south of the application site, adjacent to the main line railway did provide a mineral and aggregate depot, the use ceased during Crossrail works, but have recently recommenced.

The north eastern boundary is defined by wooded slopes which run down to the adjoining River Frays, beyond which is a railway embankment which carries the single track branch line which the access road crosses. Beyond the railway embankment are traditional residential and industrial areas along and adjoining Tavistock Road, with a number of industrial sites currently being re-developed for residential purposes. The branch line continues along the northern boundary of the application site and is used for aggregates traffic, and follows the northern and western boundaries of the wider coal yard site before continuing directly south past the M4 and M25 interchange. Beyond the branch line to the north, there are residential areas on Trout Road and Trout Lane, along with further business/industrial uses, mainly comprising storage/haulage type uses, all of which are located within the Colne Valley Park. This area forms designated Green Belt and includes the Slough Arm section of The Grand Union Canal and Little Britain, Cowley, both of which are Nature Conservation Sites of Metropolitan or Borough Grade I Importance; Cowley Lock Conservation Area lies further north. Immediately to the south, the application site is adjoined by the wider coal yard site, with the Great Western Main Line forming the wider yard area's southern boundary. Beyond the Main Line are residential properties in Fairway Avenue, Fairway Gardens and Weirside Gardens of which the first two roads form part of an Area of Special Local Character.

The surrounding land in the vicinity of the application site lies within the floodplain of the River Colne and its tributaries, albeit the site itself lies at a man-made higher elevation of approximately 30.0m Above Ordnance Datum (AOD). The relatively flat natural topography characterises the surrounding area of the application site to the north, west and south.

Colne Valley Park, is a large north/south linear park that runs from the northern edge of Staines in the south to the southern edge of Rickmansworth in the north, wraps around the Application Site from the north to the west, where the administrative boundary of Hillingdon ends and gives way to South Buckinghamshire District Council; the River Colne runs north south through the park. The Iver Water Treatment Works lies further to the west, inside the

M25.

The application site is located within an Air Quality Management Area and forms part of an Archaeological Priority Area. The adjoining site to the south, which adjoins the Great Western Mainline is also proposed as a Railhead Safeguarded Area for minerals within the emerging Local : Part 2- Site Allocations and Designations (Revised Proposed Submission Version, October 2015).

3.2 Proposed Scheme

The planning application is for the change of use of the site to provide a Civic Amenity Site (part retrospective) accommodating a public recycling area with circular route and in and out access arrangement, trade waste area, back of house facilities including storage and separation areas with associated container storage, site and welfare offices and installation of palisade fencing and gates for a 5 year temporary period.

The site would handle up to 48,000 tonnes of waste per year with opening hours of 8:00 to 18:00 hours - Mondays to Fridays and 9:00 to 17:00 hours - Saturdays, Sundays and Bank /Public Holidays (subject to seasonal variation).

The applicant responsible for this planning application is London Borough of Hillingdon. The Council's Environmental Services Waste Team require a facility in the south of the borough due to the acute and long-standing shortage of Civic Amenity (CA) facilities in the wider Council area. Originally, the Council had three full-time sites, Rigby Lane, Hayes, New Years Green Lane, Harefield and the very large site at Victoria Road, South Ruislip. Now only the Harefield site operates on a full time basis, supplemented by the temporary facility at Tavistock Road which only operates on one weekend per month.

The long term solutions to address this deficiency in service provision within the borough are being sought, but in the meantime a temporary facility at Tavistock Road would provide a much needed increase in CA capacity, the principal beneficiaries of which will be local residents.

The proposals seek to provide a public area at the front of the site with a new tarmacked circular vehicle route provided through separate in and out gates. Waste containers with stepped access would be sited within the middle and along the northern boundary and part of the front boundary on the existing hardstanding areas with servicing/parking space provided at the front / by the sides of the containers. Staff parking spaces for 5 vehicles, and a small existing site office and staff welfare building would be sited along the southern boundary of the site. A separate trade vehicle access would be sited to the left of the public access gate.

At the rear of the public area, behind palisade fencing would be a trade waste area comprising of the servicing area using the existing hardstanding tarmac surface with waste containers sited along the northern boundary. This is a common service/feature of typical Civic Amenity sites such as at New Years Green Lane, Harefield and is aimed at small businesses/builders/gardeners/landscape gardeners operating locally and small loads on vans, small pick-ups etc would be the normal type of service vehicle. This service has not been offered by the Council from this site before due to the restricted opening on one weekend per month i.e. the 'Golden Weekends' which could not be presented as a reasonable service offering to small businesses. The other main reason that Councils across the country like to offer such a facility to local businesses is that it generates revenue for the

Council which effectively reduces the net cost to the Council of operating their Civic Amenity sites. This is Hillingdon's intention here. The proposed tonnage per annum collected from trade waste is minimal, and would be capped at 10,000 tonnes and would mostly be small builders waste, green/garden waste/brick rubble etc.

To the rear of trade waste area would be the back of house facilities comprising of full/empty skip storage area and lorry car park as existing and a waste separation area.

The application is supported by the following documents:-

Planning Statement:

This provides some background to the statement, advising that the waste plan for the area, the West London Waste Plan (WLWP) was adopted in July 2015 which identifies Tavistock Road as an existing Civic Amenity site.

The Planning Statement goes on to state that the proposed application is simply seeking a temporary 5 year permission for the existing Civic Amenity use to be expanded from its current 28 days a year. The applicant is very mindful of the sites planning history and sensitivities, such as the previously refused planning applications and recent enforcement appeal. As a result of discussions with the Council's planning team, the following 4 measures are proposed to address any possible local concerns:

- (i) Annual waste tonnage will be less than 48,000 tonnes a year (in total),
- (ii) Hours of use will be restricted to between 8am and 6pm (9am to 5pm on weekends and public and bank holidays)
- (iii) The site will be operated by LB Hillingdon with high level site management controls similar to those that exist at Harefield Civic Amenity Site,
- (iv) A temporary permission only is sought, so that there is no possible conflict with the Part Two Hillingdon Plan emerging site allocation proposals for the site.

The statement goes on to advise that the proposals will operate within the defined plot of land as covered by the Environment Agency Permit and will adhere to all associated conditions as set out in the permit. The use will not involve any changes to the existing topographical features within the site, with only some surface finishing to allow for safe loading and off-loading areas with clearly marked out vehicle in and out routes.

The statement goes on to list the benefits of the scheme, including:-

- Continued use of the existing Civic Amenity site as opposed to construction of a new facility, convenient location for residents across the borough and a lot closer for those living in the southern part of the borough
- Provide residents with an alternative to roadside collections,
- Improve the level of recycling across the borough and in London as a whole,
- Encourage trade waste disposal south of the borough,
- Reduce fly tipping as easier and closer to dispose of unwanted items from households and businesses,
- Creation of an LB of Hillingdon hub for various council services and increase efficiency,
- Saving of approximately 10 miles of round trip for residents living south of Uxbridge town centre to use Harefield Civic Amenity Site which would equate to saving of about 40 minutes per trip to Harefield,
- Substantial saving in fuel and pollution from lengthy queues at peak times,
- Past few years has seen major residential developments in the south of the borough and this facility will benefit those residents and encourage residents to dispose of waste

responsibly,

- There has been a sharp rise in fly-tipping which impacts upon Council's budgets in clearing the waste materials. Having a Civic Amenity site nearby would help to reduce fly-tipping, particularly of bulkier items,
- Would create new jobs which would be sourced locally.

The report goes on to provide a brief physical assessment of the works.

Transport Statement

This describes the site and advises that the existing part-time Civic Amenity Site has been operational since 2009. The statement then goes on to describe existing conditions and notes that the internal access road at 6.5m wide is more than suitable for normal two-way traffic, including HGVs. It advises that the number of times access to the site is disrupted. Planning policy is briefly described, together with the development proposals. Residents will be able to deposit waste in 15 locations and staff will be on hand to deal with queries and to ensure the facility operates efficiently. There will be 7 full-time staff on site as compared to the current weekend operation when 4 staff are employed. There will be up to 10 container lorries based at the site that will be used to remove full waste containers and ensure a regular supply of empty containers for residents to use. The longer hours of opening will reduce queuing at the site and with the more convenient operating hours, it will provide residents in the southern part of the Borough with a full time facility and reduce the distance that residents have to travel to use such a facility. The report then considers trip generation resulting from the proposals, having regard to the weekday morning and afternoon peaks and Saturday and Sunday peak hours. Baseline and future traffic is considered, which includes traffic from consented schemes /sites under construction such as the adjoining COMAG site and the report assumes that all traffic will pass through the Tavistock Road/High Street junction. The report concludes that with 1773 vehicles passing through the junction in the afternoon peak hour and an additional 23 vehicles generated by the proposal, the impact would not be significant. The same would apply in the morning peak hour and the additional traffic would be less than 2% of the total passing through the junction. With the much reduced Saturday and Sunday traffic flows which result from the extended hours of opening, the generated traffic would be within the operating capacity of the junction and will not result in significant delays. The report then advises that although the internal access road can accommodate over 20 vehicles so that even during peak periods at busy weekends, queues back to the Tavistock Road are unlikely, a warning sign should be installed to advise when queues are 15 minutes are likely. The geometry of the Tavistock Road/ High Street junction does restrict the movement of HGVs turning left or right into Tavistock Road but the scale of the issue is in the order of 1 HGV per hour and this can be reduced by the future operator liaise with highway authorities and Police to minimise the impact of the problem. The report presents its summary and conclusions and estimates that the proposed development will have a minimal and acceptable level of impact on the local highway infrastructure and offers an opportunity for local residents to reduce journey times and distances when compared to the use of the existing Harefield CAS.

3.3 Relevant Planning History

Comment on Relevant Planning History

A planning application (18736/APP/2013/1784 refers) for the demolition of existing buildings and redevelopment of site to provide a materials recovery and recycling facility and Civic Amenity Site, incorporating a recovery and recycling building, storage bays, administration office/training building, external processing and storage area, two weighbridges, reuse and

extension of railway sidings, and Civic Amenity Centre, together with associated car parking, landscaping, fencing and infrastructure was refused permission on 19/3/14 for the following reasons:-

1. The proposal involves a significant number of traffic movements, including many by heavy goods vehicles and the application fails to provide an accurate assessment of highways and transportation impacts associated with the proposed development and as such the scheme fails to demonstrate that it would not be detrimental to highway and pedestrian safety and the free flow of traffic contrary to policies AM2, AM7 and LE1 of the Hillingdon Local Plan Part 2 Saved Policies (November 2012) policies 2.15, 5.17 and 6.3 of the London Plan (July 2011) and paragraph 32 of the National Planning Policy Framework.

2. The proposed development will significantly increase the traffic passing over the level rail crossing, and in the absence of a full risk assessment in respect of the use of the level crossing the application fails to demonstrate that it would be safe for the public and rail operators, contrary to policies AM7 and AM11 of the Hillingdon Local Plan Part 2 Saved Policies (November 2012), policies 2.6, 6.2, 6.3 and 6.4 of the London Plan (July 2011) and paragraph 32 of the National Planning Policy Framework.

3. The applicant has failed to demonstrate that the air quality impacts of the development would not be unacceptable. The scale and magnitude of the development requires a much greater understanding of the air quality impacts and without this no proper assessment of mitigation can occur. The extent of the impacts is not sufficiently clearly set out in the Air Quality Assessment. Accordingly the proposal is contrary to Policy 7.14 of the London Plan and the Council's Supplementary Planning Guidance on Air Quality and the provisions set out in the National Planning Policy Framework.

4. The applicant has failed to provide a contribution towards the improvement of services and facilities as a consequence of demands created by the proposed development in respect of construction training, Highways matters, air quality monitoring, environmental mitigation (including but not limited to measures to control impacts of activities that would impact on residential amenity) and project management. The proposal therefore conflicts with Policies AM1, AM11 and R17 of the adopted Hillingdon Local Plan Part 2 Saved Policies (November 2012) and Policies 4.1, 4.12, 6.7 and 7.1 of the London Plan (July 2011) and the London Borough of Hillingdon Planning Obligations Supplementary Planning Document.

The application is of very little relevance to the current proposal as it related to a vastly different scale of operation (900,000 tonnes) and involved the actual recycling of materials.

A subsequent application (18736/APP/2015/4457 refers) for the demolition of existing buildings and redevelopment of site to provide a materials recovery and recycling facility and Civic Amenity Site, incorporating a recovery and recycling building, storage bays, administration office/training building, external processing and storage area, two weighbridges, reuse and extension of railway sidings, and Civic Amenity Centre, together with associated car parking, landscaping, fencing and infrastructure was refused on 5/8/16 for the following reasons:-

1. The application has failed to demonstrate that the development cannot be delivered at any available and suitable existing waste management site within the Borough or OPDC area where the development is proposed and at the sites listed in Tables 5-1 and 5-2 of the

West London Waste Plan (July 2015) contrary to Policy WLWP3 of the West London Waste Plan (July 2015) nor has the application demonstrated how the requirements under paragraphs b to d of Policy WLWP3 of the West London Waste Plan (July 2015) shall be met.

2. The proposal involves a significant number of traffic movements, including many by heavy goods vehicles and the application fails to provide an accurate assessment of highways and transportation impacts associated with the proposed development and as such the scheme fails to demonstrate that it would not be detrimental to highway and pedestrian safety and the free flow of traffic contrary to policies AM2, AM7 and LE1 of the Hillingdon Local Plan Part 2 Saved Policies (November 2012) policies 5.17 and 6.3 of the London Plan (March 2015) and paragraph 32 of the National Planning Policy Framework.

3. The applicant has failed to demonstrate that the air quality impacts of the development would not be unacceptable. The scale and magnitude of the development requires a much greater understanding of the air quality impacts and without this no proper assessment of mitigation can occur. The extent of the impacts is not sufficiently clearly set out in the Air Quality Assessment. Accordingly the proposal is contrary to Policy 7.14 of the London Plan (March 2015) and the Council's Supplementary Planning Guidance on Air Quality and the provisions set out in the National Planning Policy Framework.

4. The applicant has failed to provide a contribution towards the improvement of services and facilities as a consequence of demands created by the proposed development in respect of construction training, Highways matters, air quality monitoring, environmental mitigation (including but not limited to measures to control impacts of activities that would impact on residential amenity) and project management. The proposal therefore conflicts with Policies AM1, AM11 and R17 of the adopted Hillingdon Local Plan Part 2 Saved Policies (November 2012) and policies 4.1, 4.12, 6.7 and 7.1 of the London Plan (March 2015) and the London Borough of Hillingdon Planning Obligations Supplementary Planning Document July 2014.

5. It is considered on the basis of information provided by Network Rail concerning circumstances where a level crossing upgrade is required that the proposals would necessitate an upgrade of the existing level crossing. In the absence of a full risk assessment and details of any level crossing upgrade the Council has insufficient information to demonstrate that the proposals would be safe for the public and rail operators, contrary to policies AM7 and AM11 of the Hillingdon Local Plan Part 2 Saved Policies (November 2012), policies 2.6, 6.2, 6.3 and 6.4 of the London Plan (FALP March 2016) and paragraph 32 of the National Planning Policy Framework.

This proposal is similarly of limited relevance to the consideration of the proposal for a Civic Amenity Facility.

An enforcement notice was also issued on 5/6/15 against the change of use of land from General Industrial (B2)/Storage and Distribution (B8) to a Skip and Waste Container Transport Operation (Sui Generis). The notice was appealed and was dismissed by the Planning Inspectorate on 27/7/17.

4. Planning Policies and Standards

UDP / LDF Designation and London Plan

The following UDP Policies are considered relevant to the application:-

Part 1 Policies:

PT1.E1	(2012) Managing the Supply of Employment Land
PT1.BE1	(2012) Built Environment
PT1.EM1	(2012) Climate Change Adaptation and Mitigation
PT1.EM6	(2012) Flood Risk Management
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.EM8	(2012) Land, Water, Air and Noise
PT1.EM11	(2012) Sustainable Waste Management

Part 2 Policies:

NPPF	National Planning Policy Framework
LPP 2.7	(2016) Outer London: Economy
LPP 2.8	(2016) Outer London: Transport
LPP 4.1	(2016) Developing London's economy
LPP 4.4	(2016) Managing Industrial Land and Premises
LPP 5.1	(2016) Climate Change Mitigation
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.3	(2016) Sustainable design and construction
LPP 5.7	(2016) Renewable energy
LPP 5.13	(2016) Sustainable drainage
LPP 5.14	(2016) Water quality and wastewater infrastructure
LPP 5.15	(2016) Water use and supplies
LPP 5.16	(2016) Waste net self-sufficiency
LPP 5.17	(2016) Waste capacity
LPP 5.18	(2016) Construction, excavation and demolition waste
LPP 6.1	(2016) Strategic Approach
LPP 6.2	(2016) Providing public transport capacity and safeguarding land for transport
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.4	(2016) Enhancing London's Transport Connectivity
LPP 6.5	(2016) Funding Crossrail and other strategically important transport infrastructure
LPP 6.11	(2016) Smoothing Traffic Flow and Tackling Congestion
LPP 6.12	(2016) Road Network Capacity
LPP 6.13	(2016) Parking
LPP 6.14	(2016) Freight

LPP 7.1	(2016) Lifetime Neighbourhoods
LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character
LPP 7.8	(2016) Heritage assets and archaeology
LPP 7.14	(2016) Improving air quality
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 8.2	(2016) Planning obligations
LPP 8.3	(2016) Community infrastructure levy
BE13	New development must harmonise with the existing street scene.
BE25	Modernisation and improvement of industrial and business areas
BE34	Proposals for development adjacent to or having a visual effect on rivers
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
OE1	Protection of the character and amenities of surrounding properties and the local area
OE3	Buildings or uses likely to cause noise annoyance - mitigation measures
OE8	Development likely to result in increased flood risk due to additional surface water run-off - requirement for attenuation measures
OE11	Development involving hazardous substances and contaminated land - requirement for ameliorative measures
LE1	Proposals for industry, warehousing and business development
LE2	Development in designated Industrial and Business Areas
AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
AM7	Consideration of traffic generated by proposed developments.
AM8	Priority consideration to pedestrians in the design and implementation of road construction and traffic management schemes
AM9	Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
AM13	AM13 Increasing the ease of movement for frail and elderly people and people with disabilities in development schemes through (where appropriate): - (i) Dial-a-ride and mobility bus services (ii) Shopmobility schemes (iii) Convenient parking spaces (iv) Design of road, footway, parking and pedestrian and street furniture schemes
AM14	New development and car parking standards.
AM15	Provision of reserved parking spaces for disabled persons
SPD-PO	Planning Obligations Supplementary Planning Document, adopted July 2008

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- 30th March 2018

5.2 Site Notice Expiry Date:- 30th March 2018

6. Consultations

External Consultees

85 neighbouring properties have been consulted on this application, together with Yiewsley Ward Councillors, West Drayton Residents' Association, West Drayton Garden City Residents' Association, Yiewsley and West Drayton Town Centre Action Group, West Drayton and District Local History Society and South Buckinghamshire District Council. The application has been advertised in the local press on 7/3/18 and a total of 14 site notices have been displayed adjacent to the site and in adjoining residential areas to the north of Tavistock Road and along the High Street on the 9/3/18 with a closing date of 30/3/18.

83 responses have been received, together with a petition, with circa 400 signatories (the final figure to be confirmed at committee) objecting to the proposals.

The petition states:-

'We object to the proposals for a full time Civic Amenity, Trade Waste and Waste Separation Site on the grounds that they would result in:-

- (i) An unacceptable increase in traffic 7 days a week when added to traffic generation from large housing developments nearby under construction and the opening of Crossrail Elizabeth line at West Drayton Station. This will add to existing traffic, parking and road safety pressures in the area,
- (ii) The introduction of the use of processing of Trade Waste to the site which is a new unlicensed use,
- (iii) The introduction of the use of waste separation to the site which is a new unlicensed use,
- (iv) Increased noise, dust and pollution from this elevated site in a densely populated residential area and material loss of amenity and health for residents,
- (v) Would prejudice the long term Local Plan proposed allocation for mixed Town Centre uses for the site.

Residents consider that this may be a way of established trade and waste separation on the site. Residents do not wish the Council to assist this and therefore request that the Planning Application is refused.'

The individual responses raise the following concerns:-

Highways and traffic

- (i) Major concern on Powerday proposals was the disruption to local traffic flow, yet this proposal would result in self same movement of large trucks, 10 hours a day, 7 days a week which is a lot of traffic in an area the Council previously agreed was untenable for trucks,
- (ii) Since opposition to Powerday, Council have granted over a thousand residencies off both sides of the High Street, not including the new 250+ unit capacity of the new residential blocks that would now overlook the Civic Amenity site,
- (iii) Traffic in area is already very heavy, with High Street almost a constant traffic jam from well before 08:00 to after 18:00, often 20:00 on Fridays when can take 20 minutes to get through the town. This will become worse once newly built residential complexes around Tavistock Road are occupied and Crossrail works start.

- (iv) There is only very restricted access to the site via a residential road and a very busy mini roundabout which is used by all buses and private traffic in and out of West Drayton Station. Extra traffic on this busy road junction, which is already a major route back onto the High Street especially as Bentinck Rd is one way already makes the junction with High Street a road safety risk with vehicles from Tavistock Road having to inch forward which holds up traffic from West Drayton so they can enter the High Street,
- (v) Proposal, particularly with extra traffic associated with new residential developments in the area and crossrail, will adversely affect local bus services.
- (vi) Gridlock is often caused at this junction by HGVs trying to turn right. HGVs should not be allowed to exit or enter during peak hours (7:30 - 10:00 and 15:00 to 18:00),
- (vii) Proposal would generate further heavy traffic in an already congested area. This area contains schools and has high populous of school children, particularly along Station Road and Yiewsley High Street which is already dangerous,
- (viii) Having refuse lorries and residents driving through the main high street to dispose of household and trade waste seems ludicrous, especially as other sites have good transport links. An increase in traffic along the High Street should be avoided under all circumstances,
- (ix) This needs to be assessed with the added traffic from the COMAG developments and other nearby developments still to happen (ie: ex Blues Bar).
- (x) Transport Statement contains inaccuracies of facts; outdated or irrelevant data which is used to make invalid conclusions (a marked up copy of the Transport Assessment has been submitted),
- (xi) Assumptions made in the proposal of additional traffic of 23 vehicles per hour is an underestimate and flawed as site will be better advertised and taking waste from all those properties south of Uxbridge. The assessment also does not take into account the increasing density and residential population of West Drayton and Yiewsley from new developments and impact Crossrail will have (when more cars likely to be using Warwick Road at rear of Station). Colham Mill Road junction also not considered and Stockley Bypass already frequently gridlocked,
- (xii) The plan suggests an increase of only around 1,000 vehicle movements per week, but this is for 1,000 tonnes of waste per week. For that amount of waste, (at 50kg of waste per trip) around 20,000 additional vehicle movements would be required. Of course, it is possible that the majority of waste would be 'trade' waste delivered in a smaller number of larger vehicles. This 'trade' waste is referred to but not specified in the application so will the majority of the 48,000 tonnes be trade processing,
- (xiii) Whole road structure for the area between the canal and Frays river needs to be reviewed - there is a lack of suitable roads and alternatives need to be reviewed.
- (xiv) Proposal will exacerbate the poor condition of badly maintained roads and increase formation of potholes,
- (xv) The branch line crossing on access road has no safety barriers and there are no plans shown on the application to mitigate the risks associated with the higher level of usage,
- (xvi) The rail sidings at Tavistock Road are strategically important and have been used by Tarmac over the last 15 years to import circa 150,000 tonnes of aggregates into London. The information submitted in support of the application is inadequate as it does not demonstrate that the development would not prejudice or be prejudiced by the existing rail facilities as it does not consider the cumulative impact and the figures used from 2014 are not representative as this was when Crossrail were occupying the site so not based on an aggregates use which has now resumed. The submitted assessment(s) are therefore not sufficiently robust to comply with the policy threshold requirements and we would expect to see at the least a safeguarded rail sidings assessment which fairly reflects the nature and use of the existing sidings. As such, the scheme fails to accord with national and strategic policy which seeks to safeguard to safeguard existing, planned and proposed railheads and when determining applications, LPAs should not normally permit other development in mineral safeguarding areas where they might constrain potential future use for these purposes.

Noise, pollution, vermin and disturbance

- (xvii) This proposal is in a highly populated urban area and involves processing and moving

hazardous industrial waste and materials in and around a busy town centre and through residential areas. It will result in increased noise, dust, noxious smells (as it will be handling trade waste and commercial waste) and light pollution close to people's homes on a site which will operate all day, seven days a week which will be emitted en route as well as from the site which will contravene Human Rights Act and will be unsustainable and blight area for years to come. Access is via the High Street which contains a school, two doctors surgeries and two libraries and increase in HGV traffic will increase air pollution, particularly from diesels, in an area that already has extremely high pollution levels from Heathrow, planes, trains and traffic etc. Noise from machinery and unloading lorries will be horrendous and residents will not be able to sit and relax in their gardens,

(xviii) There is a potential for more weekend vehicle movements and noise from traffic and the site is way too close to residential locations and residents are already having to put up with Powerday,

(xix) The so called 'Golden weekend' facility has not been used by me and should never have been started by the Council due to risk of airborne contaminants from this elevated position falling on nearby roads and homes risking health and well being,

(xx) Proposal will generate litter which will not be collected,

(xxi) the proposal will attract vermin, near to residential area,

(xxii) Proposal will increase risk to public health, particularly local asthma patients and can already smell burning/recycling from the site,

(xxiii) There is already a problem of rubbish and fly-tipping in and around West Drayton without another tip,

(xxiv) Proposal will threaten investment benefits of Crossrail,

(xxv) West Drayton needs smartening up not having a dump placed in the middle of it,

(xxvi) Proposal will destroy quality of life for local people,

(xxvii) Residents in Fairway Avenue chose to live in a quiet resident road and over the years have had to contend with this and similar threats to right to live in peace without constant threats to mental and physical well being.

Consultation

(xxviii) As resident in Fairway Avenue, we have not been consulted on this application nor have we seen anything in the free papers or magazines,

(xxix) Residents have been given a very short timeframe to object to proposal and consultation period needs to be extended to the end of April,

(xxx) Tarmac have leased the rail siding at Tavistock Road for use as an aggregate freight terminal since 2004. As the nearest neighbouring development, it is not clear why Tarmac were not consulted on the submission,

General comments

(xxxi) This Council scheme is a betrayal of the 4,000 petitioners and others who have fought Powerday in what was believed to be a joint effort between citizens and the Council. Hillingdon are now proposing something which could conceivably be worse,

(xxxii) Will Powerday be given the operating contract and thereby gain permission by the back door?

(xxxiii) Other sites should be considered for waste disposal,

(xxxiv) There has been significant regeneration in the borough, in part due to crossrail. This site is perfect for residential use and central London commuters and this should be explored further,

(xxxv) High Street should be made greener to encourage trade in local shops, not an artery to dispose of waste

(xxxvi) Rubbish from the elevated site is visible from Tavistock Road and is obtrusive and a perpetual eyesore

(xxxvii) A medical centre which was promised or a leisure centre is desperately needed in the area, especially given all the new housing that has been allowed to be built,

(xxxviii) Do not need a new recycling facility as already perfectly good, easily accessible sites at Harefield and Langley, Buckinghamshire. The site was withdrawn from the West London Waste Plan

on the basis that it is not required and not accessible,
(xxxix) We do need a new civic amenity site in the south but the current proposal is not suitable
(xxxx) Council should not be putting in a temporary site but committed to finding a permanent solution. Unlikely that the use would be abandoned once building work had been undertaken and a five year temporary permission will be extended to another 5 years etc,
(xxxxi) More filth and waste for West Drayton. The south of the borough is again being used as a dumping ground,
(xxxxii) The application fails to identify, in any form whatsoever, the ownership, composition, transport activities, etc of the collection, sorting, transportation and quantities and types of materials entering and leaving the trade waste unit,
(xxxxiii) This is not putting 'residents first',
(xxxxiv) The negatives of the proposal such as processing and movement of hazardous industrial waste close to town centre and residential areas, additional heavy traffic etc will far outweigh the 'convenience' factor relating to residential waste access and financial savings cannot be compared to the cost to the residents of such a massive loss of quality of life that proposal will bring
(xxxxv) Local infrastructure has not kept pace with new development and such a facility would be inappropriate in an area that now has a much higher population than when the site was a coal yard,
(xxxxvi) Would be fairer to all residents of borough if this was put in Ickenham or Ruislip instead,
(xxxxvii) I use the tip rarely and would much rather drive to Harefield once a year than suffer continuous congestion, noise and smell of a tip a hundred yards from home,
(xxxxviii) Need to recycle more is a national imperative and we should not have to show Hillingdon First card to use facilities.

Environment Agency:

We have reviewed the submitted information and have no objection to the planning application.

Advice to Local Planning Authority

The submitted planning statement states that 'the site is to be operated by London Borough of Hillingdon (LB Hillingdon) only...', however the current Environmental Permit with this application is in the name of Powerday PLC. Please note that the permit holder must be the legal operator of the site

This means the permit holder must have 'sufficient control' of the activity or facility. You must, for example:

- Have day-to-day control of the facility or activity, including the manner and rate of operation.
- Make sure that permit conditions are complied with.
- Decide who holds important staff positions and have incompetent staff removed, if required.
- Make investment and financial decisions that affect the facility's performance or how the activity is carried out.
- Make sure your activities are controlled in an emergency.

From the application it would appear that LB Hillingdon will be the legal operator and as such the permit either needs to be transferred to them or they need to apply for their own permit for the site. More information on the legal operator can be found here:

<https://www.gov.uk/guidance/legal-operator-and-competence-requirementsenvironmental-permits>

Officer note:

An informative has been added to deal with the permit issue.

GLAAS:

Recommend - No Archaeological Requirement

Having considered the proposals with reference to information held in the Greater London Historic

Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

Although within an Archaeological Priority Area, this development is unlikely to have a significant impact on archaeological remains.

No further assessment or conditions are therefore necessary.

Yiewsley and West Drayton Town Centre Action Group:

For and on behalf of Yiewsley & West Drayton Town Centre Action Group, and myself individually as a resident within 60 metres directly from the proposed site in the Coal Yard, I object to the application, as not only will I as a resident within range of the site, be subjected to noise, fumes and dust from the operation, there will be enormous impact on the High streets in both Yiewsley and West Drayton, particularly at peak times and the Junction of Tavistock Road with Station Road is, in spite of what TfL say, cannot cope when a log jam occurs, as those routes are the only means of ingress and egress for the site, and I would therefore hope that another location in the south can be found and the current application is withdrawn.

Garden City Estate Residents' Association:

We ask the planning committee to reject this application. We do so for two reasons: our objections on planning grounds, for example the failure to apply Policy 3 of the West London Waste Plan. We also object because the number of questions that we have had to ask, at this late stage, reflects the lack of sufficient detail in the proposal for those living locally to arrive at an informed judgement on the merits of this proposal.

Here an example is the limit of 48,000 tonnes per annum on the waste accepted by the proposed site. There are two concerns. First, no reasons are given why 48,000 is proposed. Second, even an approximate calculation of the number of vehicle journeys needed to achieve this capacity - given the restriction of traffic to the site to 'cars and vans', suggests the amount of additional traffic generated will cause major traffic problems in already noticeably busy local roads. (An estimate of number of journeys is offered but, without a view on what weight of materials this equates to, even approximately, we cannot put the proposed 48,000 tonnes per annum in context.)

Summary of Detailed comments

Overview

The Committee of the Garden City Residents' Association has more questions than we would wish on this application, due to the lack of detail or explanation in some areas:-

- The upper limit of waste processed is set at 48,000 tonnes per annum but no explanation of how this figure was arrived at. It compares with 300,000 tonnes pa used in the earlier Powerday application.

Planning Statement

- Para. 1 states that the WLWP shows the Coal Yard as an existing site but the activity at this site does not count towards Hillingdon's apportionment of Waste Management facilities under the WLWP. Is this because the service is also seen as temporary?

- Temporary 5 year permission for existing Civic Amenity site is to be expanded from its current 28 days a year, but the expansion proposed is not just to the days open but also the kind of waste accepted. Application makes specific mention of 'Trade Waste' but this is not a term used in the relevant current policy document, the West London Waste Plan which classifies waste as Municipal Solid Waste (MSW), Commercial and Industrial (C&I) and Construction, Demolition and Excavation Waste (CD&E). Not clear why standard terms are not used,

- It is stated that temporary permission is sought to avoid conflict with Part 2 of the Hillingdon Local Development Plan. Council planners should be able to say whether a Waste Management Site, permanent or temporary, conflicts with the LDP or not,

- It is stated that site to be operated by LB Hillingdon Staff only, but the Environment Permit submitted is for Powerday to cover the 'Golden Weekends'. Does the permit, unlike the Golden Weekends include 'Trade Waste'?,
- The WLWP includes policies for the development of new or existing sites for waste management, notably WLWP 3. It does not have any special provisions for temporary sites. The current application does not refer to WLWP 3 or to any special provisions for temporary site proposals. If 'Trade Waste' is covered by MSW and C&I waste, the Coal Yard site is not included in Tables 5-1 or 5-2 so not known if proposal conforms with the WLWP,
- Council have promised to add a waste management site to Harefield and one in the South of the Borough. If this site is only temporary, given what is shown in the WLWP, what other site is a candidate for future permanent development? Without a suitable candidate, how can this proposal be temporary? Or if there are other possibilities and given the sensitivities of this site, why spend tax payer's money when other candidates offer a permanent solution?,
- This proposal at the front of the site may deter interest for mixed use development on the remainder of the Coal Yard site,
- The proposal may also restrict options for improving the access route into the site,
- What are the site's 'permitted development rights' and do these just include the 'Golden Weekend' site or do they extend to the Powerday operation/ whole site?,
- Does the full time operation not involving any changes to the topographical features on site extend to the new palisade fencing?
- No detail on the waste separation area and the kind of waste to be allowed on site and where and how the separated waste will be stored. Risks include noise, dust, smells and vermin. We understood that all waste handling operations that presented risk to the public/neighbouring properties should take place indoors. Without this information, it is not possible for the public to comment sensibly on the proposal,
- Where will separated waste be disposed? Given that taking waste from this site by rail forms no part of the proposal, all waste journeys will be done on local roads,

Transport Statement

- It remains unclear whether the 'Golden Weekends' site is the same as the application site,
- Area around the application site, with the recent re-development, is increasingly becoming more residential and therefore, a waste management facility is increasingly unacceptable,
- Will Powerdays bin storage facility continue should this proposal go through?,
- Figures relate to 2014 but since 2014, after a planning appeal, the hours of Powerday's current operation have been restricted. Do we have an up-to date estimate of Powerday's traffic levels?
- Under 4 Development Proposals, rather than only cars or vans, there will be 'as many as 10 container lorries based on the site', which will generate 'approximately 1,000 tonnes per week' which needs to be transported from the site,
- Proposal does not address the strategic objectives of the WLWP as it does not address 'sustainable transport' or new, clean technologies', with main consideration being the availability of any suitable sites, not their proximity to 'waste sources',
- In EIP of the WLWP, the Inspector gave his reasons for not agreeing to this site as suitable for waste management:-

'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 site 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.' The Transport Assessment does not acknowledge the Inspector's view,

- As regards trips generation, with 1,000 tonnes of waste leaving the site per week, the assessment states that this will involve 40 HGV movements out per week, giving average load of HGV of 25 tonnes, which equals 6 vehicles a day. What is not clear is the average expected load of vehicles coming in. With 1,000 tonnes, this is 2,200,000 pounds approximately so if average vehicle delivered 200 pounds of waste, this equates to 11,000 vehicle loads per week or 1,570 in per day. Even if average were to be 500 pounds, number of vehicle loads in per week would be 4,400 or 629 per day. The averages quoted for the existing service are 262 per day (Saturdays) and 320 (Sundays). Even with an average load of 500 pounds/227kgs, the tonnage of material presently received on site once multiplied up would be considerably less than the proposed maximum tonnage of 48,000 tonnes per year. Will the difference be accounted for by the extension to trade waste as well as domestic waste and the diversion of waste from Harefield and other sites outside of Hillingdon? Given these preliminary calculations, more work is required.

Internal Consultees

Planning Policy (Summary):

The existing Civic Amenity site is listed in Appendix 2 of the Adopted West London Waste Plan (WLWP) as an existing waste facility. Policy WLWP 3 (Location of Waste Development) states that waste development proposals on existing waste management sites will generally be supported, provided the proposals comply with the development plan for the area.

The Old Coal Yard site is currently identified as an Industrial Business Area (IBA) in the Council's Unitary Development Plan Saved Policies document. This designation is subject to the provisions of policy LE2 in this document, which was retained following the adoption of the Local Plan Part 1 in November 2012. The proposed Civic Amenity site is consistent with the uses that are listed in policy LE2 as being acceptable in IBAs.

Policy SA37 in the emerging Local Plan Part 2 Site Allocations and Designations document identifies the Former Coal Depot, Tavistock, Yiewsley as a site that is suitable for mixed-use development. The Civic Amenity facility occupies a proportion of the proposed allocation and subject to suitable mitigation, it may be possible for residential development to come forward elsewhere on the Coal Depot site.

In any event, it is anticipated that the proposed allocation would not be implemented until the end of the plan period, after the proposed 5 year consent for the Civic Amenity site has expired.

Highway Engineer:
Site Characteristics

Entry and exit to the development site is gained via an internal access road that connects to Tavistock Road at a currently uncontrolled junction. Just 50 metres east of this junction Tavistock Road intersects with High Street Yiewsley. This access road provides the only means of access to the site. The driveway joins Tavistock Road at an acute angle making right turns into the site and left turns out of the site difficult.

The internal access road is measured approximately 150 metres from the Tavistock Road junction; this provides capacity for up to 25 vehicles to wait in a queue at times of high demand.

Travel choice

Given that the development will be used by residents to deposit waste, much of which will be bulky, it is very likely that most visitors will arrive by private car. Nevertheless, the site does offer good connectivity to the local public transport network. This provides people working at the site with travel choice helping to reduce their reliance on the private car for trip making.

West Drayton station is nearby providing trains to Central London and Reading as well as interchange with numerous bus services including:-

- U1 West Drayton to Uxbridge;
- U3 Heathrow Central bus station to Uxbridge;
- U5 Hayes to Uxbridge;
- 222 Hounslow to Uxbridge;
- 350 Hayes to Heathrow Terminal 5; and
- 698 School Service.

The site has a PTAL of 3 indicating that the site has reasonable access to public transport.

Trip Generation

To build an understanding of the amount of vehicular trips the site is likely to generate the TRICS data base has been interrogated. TRICS is the 'industry standard' national database of trip generation. This works by selecting a comparable site from the data base in terms development type and location. The most similar site found is situated in Kingston which similar to West Drayton forms part of outer West London. This site is described as being situated in a suburban area and provides work for 9 members of staff, 6 of whom work full time, 3 part time compared to the 7 full time members of staff associated with this application. The Kingston site also has 17 recycling bays compared to The Old Coal Depot's 15 bays. According to TRICS, the time of peak trip generation is 13:00 to 14:00 hours, at this time 44 vehicles arrive at the site. During the full day when the site was open, 09:00 to 16:00 hours, according to TRICS there were 178 arrivals and 174 departures.

The Transport Statement that accompanies this application presents baseline and future traffic flows taken from a Transport Assessment prepared for a site adjacent to the development site dated November 2017. This TA was prepared as part of planning application ref, 24843/APP/2017/2974 for a residential development, referred to as COMAG, situated on Tavistock Road on a site opposite the developments access road. Taking into account this TA which officers validated, together with other evidence provided, the Highway Authority raised no objections.

The TA reports that the peak two-way traffic flows along Tavistock Road was 220 vehicles in the AM Peak and 240 two-way flows in the PM Peak. The TA also mentions that 1,655 vehicles passed through the Tavistock Road/High Street junction in the AM peak hour and 1,689 passing in the PM peak hour. The TA goes on to predict future traffic growth for the year 2022. Using a TEMPRO growth factor of 1.05, the 1,655 vehicles in the AM Peak would increase to 1,738 and the 1,689 vehicles in the PM Peak would increase to 1,773. TEMPRO is the industry standard modelling tool designed to allow users to review road traffic growth actual and forecast based on data supplied by the Department for Transport.

The TA also presents the outputs of a traffic modelling built to test the performance of the Tavistock Road/High Street junction with background traffic growth and committed developments. These results show that that in 2022, even in a worst case scenario the junction would still have adequate capacity allowing it to operate satisfactorily.

Taking into account the modest number of trips, the number of trips that a comparable site on the TRICS data base generated and that the outcome of recent modelling show that with background growth and committed development the junction of Tavistock Road/High Street still operates

satisfactorily in 2022, based on the evidence provided there are no concerns that the development would have a detrimental impact upon road safety or the flow of traffic on the surrounding road network.

In accordance with Council policy, 20% of all staff car parking spaces would have active electric vehicle charging points and 20% passive electric vehicle charging points. A passive electric vehicle charging point is one which has servicing only allowing a charging point itself to be installed relatively easily at a later date.

It is also Council policy that 10% of all car parking spaces should be accessible for disabled people.

It is noted that the application is for a Civic Amenity site that would process no more than 48,000 tonnes per annum of deposited material. It is key to the satisfactory operation of this site that this limit is managed so as not to be exceeded. It is required that is addressed by way of condition.

Conclusion

Taking into account that with the development the junction of Tavistock Road/High Street will continue to operate in 2022, there are no objections to the development on transportation grounds.

Tree/ Landscape Officer:

This site is occupied by a railway yard, formerly operating as a coal depot, situated on an elevated plot, to the west of Yiewsley Town Centre.

The red line area is a relatively small plot within a complex of open storage yards on the whole plateau, located in the north-east corner of the site at the end of an access road.

The existing yard is already contained within a mix of concrete walls and steel palisade fencing.

The north boundary is defined by wooded slopes down to the River Frays, which help to screen the site from the residential properties on Tavistock Road.

The site is bounded to the south by the Great Western Main Line Railway, beyond which is a residential area, Fairway Avenue, which is locally designated as an ASLC.

Due to the operational nature of the site, there are few notable trees, albeit the boundary trees have an important screening function.

There are no TPO's or Conservation Area designations affecting the site.

The site overlooks the Green Belt and a Nature conservation Site of Metropolitan, or Borough Grade 1 Importance.

Comment

No trees or other vegetation will be affected by the proposal.

The proposed character and appearance of the area will be little changed with the proposed use of the concrete storage yards contained by existing boundary treatments.

One important consideration for the management of amenity sites is the control of wind-borne litter. Wherever there are no solid perimeter barriers (such as palisade fencing the inner face should be lined with netting or a solid timber fence to contain all litter within the site.

No landscape proposals have been suggested for this 5 year temporary permission. However, there may be incidental areas available for planting, such as at the site entrance.

Any opportunities for landscape enhancement should taken in accordance with saved policy BE38.

Recommendation

No objection subject to conditions COM9 (parts 1, 2 and 4)

Sustainability Officer:
Comments on the Civic Amenity Site:

1 - Drainage

The drainage from the site is not entirely clear. There are clear linkages towards the Frays River. It is accepted the site will not increase runoff but what runoff there is needs to be managed appropriately. The following condition is necessary:

Condition

Prior to the commencement of development full details of the surface water drainage regime shall be submitted to and approved in writing by the Local Planning Authority. The drainage scheme needs to detail clearly the methods to prevent contaminated runoff from entering controlled waters as well as the details of discharges, including locations and rates. The development must proceed in accordance with the approved scheme.

Reason

To protect water quality in accordance with Policy EM8 of the Local Plan

2 - Air Quality

The site is within an air quality management plan but no traffic concerns have been reported to the air quality team. Assuming no traffic concerns the following informative is necessary:

The applicant should consider measures to encourage the use of low emission vehicles through measures such as prioritisation of services for electric vehicles. The applicant should also consider setting restrictions on the HGVs using the facility to Euro V and Euro VI standards.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The application seeks an intensification of use of the existing Civic Amenity site from the current two days (one weekend) per month to allow its full time operation for a temporary period.

The NPPF sets out the Core Planning Principles which should underpin both plan-making and decision-taking. This includes proactively driving and supporting sustainable economic development and supporting the transition to a low carbon future, and encouraging the reuse of existing resources. The Government also encourages the effective use of land by utilising brownfield land.

With regard to delivering sustainable development, paragraph 21 states that investment in business should not be over burdened by the combined requirements of planning policy expectations. In addition, paragraph 22 goes on to state that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.

Chapter 4 on promoting sustainable transport states that encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. Paragraph 32 sets out that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

The Government's Planning Practice Guidance provides guidance on waste management

issues and sets out the circumstances when unallocated sites can be used for waste related development (i.e. sites that are not allocated for that use in a Local Plan document). It states that there may be significant changes in, for example, technological impact and land ownership that occur over a short period of time and provide opportunities that were not anticipated. In the case of waste disposal facilities, applicants should be able to demonstrate that the envisaged facility will not undermine the waste planning strategy through prejudicing movement up the Waste Hierarchy. If the proposal is consistent with an up to date Local Plan, there is no need to demonstrate 'need'.

Policy 5.17 of the London Plan relates to waste capacity and states that:

"A The Mayor supports the need to increase waste processing capacity in London. He will work with London boroughs and waste authorities to identify opportunities for introducing new waste capacity, including strategically important sites for waste management and treatment, and resource recovery parks/consolidation centres, where recycling, recovery and manufacturing activities can co-locate.

Planning decisions

B Proposals for waste management should be evaluated against the following criteria:

- a locational suitability (see LDF preparation paragraphs F and G below)
- b proximity to the source of waste
- c the nature of activity proposed and its scale
- d minimising waste and achieving high reuse and recycling performance
- e achieving a positive carbon outcome of waste treatment methods and technologies (including the transportation of waste, recyclates and waste derived products) resulting in greenhouse gas savings. Facilities generating energy from waste will need to meet, or demonstrate that steps are in place to meet, a minimum CO₂eq performance of 400 grams of CO₂eq per kilowatt hour (kwh) of electricity produced. Achieving this performance will ensure that energy generated from waste activities is no more polluting in carbon terms than the energy source it replaces (see paragraph 5.85 below).
- f the environmental impact on surrounding areas, particularly noise emissions, odour, air quality and visual impact and impact on water resources
- g the full transport and environmental impact of all collection, transfer and disposal movements and, in particular, the scope to maximise the use of rail and water transport using the Blue Ribbon Network.

The following will be supported:

- h developments that include a range of complementary waste facilities on a single site
 - i developments for manufacturing related to recycled waste
 - j developments that contribute towards renewable energy generation, in particular the use of technologies that produce a renewable gas
 - k developments for producing renewable energy from organic/biomass waste.
- C Wherever possible, opportunities should be taken to provide combined heat and power and combined cooling heat and power.
- D Developments adjacent to waste management sites should be designed to minimise the potential for disturbance and conflicts of use.
- E Suitable waste and recycling storage facilities are required in all new developments.

LDF preparation

F Boroughs must allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in this Plan. Boroughs may wish to collaborate by pooling their apportionment requirements.

G Land to manage borough waste apportionments should be brought forward through:

- a protecting and facilitating the maximum use of existing waste sites, particularly waste transfer facilities and landfill sites

- b identifying sites in strategic industrial locations (see Policy 2.17)
- c identifying sites in locally significant employment areas (see Policy 4.4)
- d safeguarding wharves (in accordance with policy 7.26) with an existing or future potential for waste management.

H If, for any reason, an existing waste management site is lost to non-waste use, an additional compensatory site provision will be required that normally meets the maximum throughput that the site could have achieved."

In terms of local planning policy the site is currently located within a designated Industrial and Business Area (IBA). However, as noted below, the emerging Local Plan Part 2 proposes that this designation is removed and the site is allocated for mixed use development. Policies LE1 and LE2 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012), seek to retain land within these areas for B1, B2, B8 and appropriate sui generis uses.

Policy LE1 of the Local Plan Part 2 states that:

"All proposals for industry (B2), warehousing (B8) and business (B1) development will be assessed by taking into account other policies of this plan and, where appropriate, the following considerations:-

- (i) whether the proposal conflicts with the local planning Authority's overall objective of securing the development or regeneration of an area;
- (ii) outstanding unimplemented planning permissions, development under construction and vacant floorspace elsewhere in the plan area;
- (iii) the availability and capacity of public transport facilities to serve proposals for employment intensive uses;
- (iv) the ability of the road system, as existing or taking due Account of committed improvements, to accommodate at normal peak hours the additional traffic generated;
- (v) whether any proposal for major development will create unacceptable demands for other land to be developed (for example, to provide for new housing or community facilities);
- (vi) the provision for access by people with disabilities and other accessible facilities both to and within buildings."

Policy LE2 requires that IBAs are designated for Business, Industrial and Warehousing purposes (Use Classes B1 - B8) and for Sui Generis uses appropriate in an industrial area. The proposal has a sui generis use which are generally considered appropriate within an IBA. As such the proposal is considered to comply with Policy LE2.

The West London Waste Plan (WLWP) was adopted in July 2015 and covers the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames. The Plan provides an up-to-date policy framework to assess planning applications for waste management facilities. Principally, it identifies sufficient sites for waste management facilities to satisfy the waste apportionment targets established in the London Plan and the site allocations are supplemented by development management policies. However, Civic Amenity/household waste does not form part of the WLWP's apportionment and therefore the WLWP does not identify sites suitable for this type of waste. The Old Coal Yard site is only identified in Appendix 2 as providing an existing temporary Household Waste and Recycling Centre (HWRC).

Policy EM11 of Local Plan Part 1 (Strategic Policies) states that the Council will aim to reduce the amount of waste produced in the Borough and work in conjunction with its partners in West London, to identify and allocate suitable new sites for waste management

facilities within the West London Waste Plan to provide sufficient capacity to meet the apportionment requirements of the London Plan, which is 294 thousand tonnes per annum for Hillingdon by 2026. Whilst the household waste and civic amenity use is not captured in the 294 thousand tonne requirement, the Council is required to reduce and manage waste and this would be delivered by the proposed use of this site over the future 5 year period.

Hillingdon's emerging Local Plan Part 2 consists of the Development Management Policies, Site Allocations and Designations and Policies Map. The Revised Proposed Submission version of the Site Allocations and Designations document identifies the Old Coal Yard site for a mix of residential and B1 uses, including SME workshops.

Having regard to the various policy documents outlined above, it is considered that the proposal would not be contrary to adopted or emerging policy providing that the use was only temporary.

7.02 Density of the proposed development

Not applicable to this type of development.

7.03 Impact on archaeology/CAs/LBs or Areas of Special Character

The site does not form part of a conservation area or an area of special local character or sited close to such areas so that their characters would be adversely affect and it also does not contain any listed buildings.

The site does form part of an Archaeological Priority Area. The Greater London Archaeology Advisory Service have been consulted and they advise that although the site does lie within an Archaeological Priority Area, this development is unlikely to have a significant impact on archaeological remains and they do not consider that any further assessment or conditions are necessary.

7.04 Airport safeguarding

As the proposal does not involve any new buildings, no airport safeguarding issues are raised by this application.

7.05 Impact on the green belt

Policy OL5 states that development adjacent or conspicuous from the Green Belt will only be permitted if it would not injure the visual amenities of the Green Belt, by reason of siting, materials, design, traffic or activities generated.

The nearest part of the Green Belt adjoins the railway line which runs along the northern boundary of the site. The proposal does not involve any new buildings, but it will involve the more intensive use of waste containers and skips. However, the Green Belt is well screened from the site by the railway and the wooded landscaped area along its northern boundary and access to the site is not gained through the Green Belt. As such, it is considered that the scheme would not material injure the visual amenities of the Green Belt, in compliance with Policy OL5 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).

A clause in the landscaping condition has been added to ensure that the wooded landscaped area within the site is adequately maintained.

7.07 Impact on the character & appearance of the area

Policy BE13 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seeks to ensure that new development makes a positive contribution to the character and amenity of the area in which it is proposed.

The site is already in use as a Civic Amenity Area, albeit less intensively than the usage proposed. This is an industrial site which is not particularly visible from surrounding roads and is surrounded by similar open yard areas. The site is also contained by existing boundary treatments. As such, the proposal will not be out of keeping with the character of the area.

7.08 Impact on neighbours

Policies BE20, BE21 and BE24 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seek to prevent developments which would be detrimental to the amenity of nearby occupiers by way of their siting, bulk, proximity, loss of light and loss of privacy.

There are no residential properties that directly abut the site. To the north, the nearest residential properties are in Merrivale Mews, off Tavistock Road some 50m away from the northern boundary of the application site. The closest properties to the site to the south are in Weirside Gardens, some 90m away. The development would be separated from surrounding residential properties on all sides by railway lines, including the Great Western Mainline in the south. This relationship and the separation distances involved are considered adequate to ensure the development does not have adverse impacts on the amenity of residential occupiers in respect of dominance or loss of light.

Accordingly, the proposal would comply with policies BE20, BE21 and BE24 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

Issues relating to air quality and noise are dealt with elsewhere in this report.

7.09 Living conditions for future occupiers

Not applicable to this commercial development.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

The National Planning Policy Framework (NPPF) at Paragraph 32 states that plans and decisions should take account of whether safe and suitable access to the site can be achieved for all people; and development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. Paragraph 35 of NPPF also refers to developments and states that developments should be located and designed where practical to give priority to pedestrian and cycle movements; create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians.

London Plan (March 2016) policy 5.17 states that proposals for waste management should be evaluated against the full traffic impact of all collection, transfer and disposal movements.

Policy 6.3 notes that Development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. It also requires that development should not adversely affect safety on the transport network

Local Plan requirements in relation to impacts on traffic demand, safety and congestion are set out in Local Plan Part 2 policy AM7 which states that the LPA will not grant permission for developments whose traffic generation is likely to (i) unacceptably increase demand along roads or through junctions which are already used to capacity, especially where such roads or junctions form part of the strategic London road network, or (ii) prejudice the free flow of traffic or conditions of general highway or pedestrian safety.

A Transport Statement dated February 2018 has been submitted which has been reviewed by the Council's Highways Engineer.

The Highway Engineer advises that given the nature of the use, with residents depositing waste, much of which will be bulky, it is very likely that most visitors will arrive by private car. Nevertheless, the site does offer good connectivity to the local public transport network which would allow people working at the site to reduce their reliance on the private car for trip making.

The Highway Engineer advises that trip generation of the proposal has been calculated by using the TRICS data base which is the 'industry standard' national database of trip generation. This works by selecting a comparable site from the data base in terms of development type and location. The most similar site found is situated in Kingston which is similar to West Drayton and forms part of outer West London. This site is described as being situated in a suburban area and provides work for 9 members of staff, 6 of whom work full time, 3 part time compared to the 7 full time members of staff associated with this application. The Kingston site also has 17 recycling bays compared to The Old Coal Depot's 15 bays. According to TRICS, the time of peak trip generation is 13:00 to 14:00 hours, at this time 44 vehicles arrive at the site. During the full day when the site was open, 09:00 to 16:00 hours, according to TRICS there were 178 arrivals and 174 departures.

The Transport Statement that supports this application presents baseline and future traffic flows taken from a Transport Assessment prepared for a site adjacent to the development site dated November 2017. This TA was prepared as part of planning application ref, 24843/APP/2017/2974 for a residential development, referred to as COMAG, situated on Tavistock Road on a site opposite the site's access road. Taking into account this TA which officers validated, together with other evidence provided, the Highway Authority raised no objections to the adjoining residential development.

The TA on the adjoining site reports that the peak two-way traffic flows along Tavistock Road was 220 vehicles in the AM Peak and 240 two-way flows in the PM Peak. The TA also mentions that 1,655 vehicles passed through the Tavistock Road/High Street junction in the AM peak hour and 1,689 passed in the PM peak hour. The TA goes on to predict future traffic growth for the year 2022. Using a TEMPRO growth factor of 1.05, the 1,655 vehicles in the AM Peak would increase to 1,738 and the 1,689 vehicles in the PM Peak would increase to 1,773 (TEMPRO is the industry standard modelling tool designed to allow users to review road traffic growth actual and forecast based on data supplied by the Department for Transport).

The Highway Engineer goes on to advise that the TA on the adjoining site also presented the outputs of traffic modelling undertaken to test the performance of the Tavistock Road/High Street junction with background traffic growth and committed developments. This predicts that 1773 vehicles would pass through the junction in the afternoon peak hour and the additional 23 vehicles generated by the proposed use would not be viewed as significant. As regards the morning peak, the additional traffic would be less than 2% of the total passing through the junction which is not significant. These results show that that in 2022, even in a worst case scenario the junction would still have adequate capacity allowing it to operate satisfactorily.

The Highway Engineer concludes that taking into account the modest number of trips, the number of trips that a comparable site on the TRICS data base generated and that the outcome of recent modelling show that with background growth and committed development the junction of Tavistock Road/High Street would still operate satisfactorily in 2022, based on the evidence provided there are no concerns that the development would have a

detrimental impact upon road safety or the flow of traffic on the surrounding road network.

7.11 Urban design, access and security

It is not considered that with the provision of palisade fencing, the development would result in any security issues, safety concerns or anti-social behavior. Any of these issues resulting from the proposed use would largely be controlled and dealt with under legislation outside of planning controls.

Urban design and access are dealt with in other section of the report.

7.12 Disabled access

The proposal is for a temporary Civic Amenity Site.

A condition is recommended to ensure that 10% of the car parking spaces satisfy disability standards in order to accord with the Council's standards.

7.13 Provision of affordable & special needs housing

Not applicable to this development.

7.14 Trees, landscaping and Ecology

Policy BE38 of the Hillingdon Local Plan: Part Two - Saved Unitary Development Plan Policies (November 2012) states, amongst other things that development proposals will be expected to retain and utilise topographical and landscape features of merit and provide new planting wherever it is appropriate.

The Council's Trees and Landscape Officer has assessed the application and advises that due to the operational nature of the site, there are few notable trees on site and there are no Tree Preservation Orders or other designations affecting the site. However, there are boundary trees which provide an important screening function.

The Tree Officer goes on to advise that no trees or other vegetation will be affected by the proposal and that the character and appearance of the area will be little changed with the proposed use of the concrete storage yards contained by existing boundary treatments.

One important consideration for the management of amenity sites is the control of wind-borne litter.

Wherever there are no solid perimeter barriers (such as palisade fencing) the inner face should be lined with netting or a solid timber fence to contain all litter within the site.

No landscape proposals have been suggested for this 5 year temporary permission. However, there may be incidental areas available for planting, such as at the site entrance. Any opportunities for landscape enhancement should taken in accordance with saved policy BE38.

The officer's recommended landscape condition forms part of the officer recommendation.

7.15 Sustainable waste management

This proposal is situated on a site already in waste management since 2009. The site offers a disposal or recycling route for household waste and trade waste that cannot be collected as part of the usual weekly waste collection service and are provided by the Council under the auspices of the Refuse Disposal (Amenity) Act 1978. If any particular waste cannot be recycled then the Civic Amenity Site operations can ensure it is appropriately disposed of. The proposed rationalisation of the site will enable the facility to continue providing the necessary means to ensure that the Borough can make a full contribution to sustainable

waste management, both within the Authority's administrative boundary and toward London's self-sufficiency aspirations, in compliance with relevant London Plan Policies for up to 5 years until permanent solutions can be found.

7.16 Renewable energy / Sustainability

This is an application for the continued temporary use of an existing Civic Amenity site, which will help deliver sustainable development through driving waste management up the waste hierarchy, addressing waste as a resource.

7.17 Flooding or Drainage Issues

The Council's Sustainability Officer advises that the drainage from the site is not entirely clear. There are clear linkages towards the Frays River. It is accepted that the site will not increase runoff but what runoff there is needs to be managed appropriately.

The officer recommends a condition requiring the submission of a surface water drainage scheme which forms part of the officer's recommendation.

7.18 Noise or Air Quality Issues

Noise Issues

Policy OE3 seeks to ensure that uses which have the potential to cause noise be permitted only where the impact is appropriately mitigated. The site will be used generally in a similar manner to the existing situation and the proposals are not anticipated to result in any significant changes to noise levels at the site.

Additional noise impacts associated with the construction phase are anticipated to be negligible.

The operational activities and traffic movements associated with the operational phase of the site are not anticipated to generate any noise impact, over and above the noise levels generated by the existing use of the Civic Amenity site.

Air Quality

Given the nature of the use, the vast majority of vehicle trips would be by private car. As the full time operation of this facility is likely to reduce the need for residents south of the Uxbridge town centre to travel to the Harefield Civic Amenity site and with the extended hours, reduce queuing, it is likely that overall, the proposal would not be detrimental to overall air quality in terms of nitrous emissions.

An informative has been added as advised by the Sustainability Officer which advises that consideration should be given to the use of low emission vehicles.

As regards odours and dust generation, the site would be managed in accordance with the Environment Agency's Permit for the site which lays down strict conditions on how the site shall be managed in order to control such matters as odour and smell generation. The Environment Agency raise no objections to the proposal, although they do advise that the Permit is required to be in the Council's name and an informative has been added to advise that this needs to be done.

7.19 Comments on Public Consultations

The petitioner comments have been considered in the main report.

As regards the individual responses, points (i) - (xi), (xiii), (xvii) to (xx), (xxii) to (xxvii), (xxxi), (xxxii) (xxxvi), (xxxviii) to (xxxxi) and (xxxiii) to (xxxv) have been dealt with either directly or indirectly in the officer's report. As regards point (xii), the 48,000 tonne limit is the maximum limit that the site would be allowed to handle, the day to day volume that the site would handle would be likely to be much less. As regards point (xiv), proposal is likely to result in the reduction in the use of the borough's roads. As regards point (xv) no objections have been received from Network Rail and the site operates safely at present. As regards point (xvi), and the aggregates depot, a safeguarded rail sidings assessment is not needed as they are safeguarded in the Local Plan Part 2. It is not considered that the proposed use would in any way impede the use of the Tarmac site. As regards vermin, (point (xxi)) the nature of the waste, being largely inert householder and green garden waste is unlikely to attract vermin, but pest control is a matter for environmental health legislation. In terms of points (xxviii) and (xxix), the level of consultation undertaken on the application, with 85 neighbouring properties and 14 site notices being displayed is considered to be commensurate with the scale and type of development proposed. Consultation responses are taken into account up until the time that a decision is made on the application. As regards point (xxx), site notices were displayed around the site, including at the site entrance. In terms of points (xxxiii), (xxxiv) and (xxxvii), the points are noted but the Local Planning Authority has to consider each application that is presented to it on its individual merits. Point (xxxv) is noted but need to make provision for recycling facilities is also an important consideration. As regards point (xxxii), it has been conditioned that the trade waste element shall not exceed 10,000 tonnes of the overall 48,000 tonnes per annum. Points and (xxxvi) to (xxxviii) are noted.

7.20 Planning obligations

The scale of the development does not give rise for the need for planning obligations.

7.21 Expediency of enforcement action

No enforcement issues are raised by this application.

7.22 Other Issues

There are no other issues raised by this application.

8. Observations of the Borough Solicitor

General

Members must determine planning applications having due regard to the provisions of the development plan so far as material to the application, any local finance considerations so far as material to the application, and to any other material considerations (including regional and national policy and guidance). Members must also determine applications in accordance with all relevant primary and secondary legislation.

Material considerations are those which are relevant to regulating the development and use of land in the public interest. The considerations must fairly and reasonably relate to the application concerned.

Members should also ensure that their involvement in the determination of planning applications adheres to the Members Code of Conduct as adopted by Full Council and also the guidance contained in Probity in Planning, 2009.

Planning Conditions

Members may decide to grant planning consent subject to conditions. Planning consent should not be refused where planning conditions can overcome a reason for refusal.

Planning conditions should only be imposed where Members are satisfied that imposing the conditions are necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects. Where conditions are imposed, the Council is required to provide full reasons for imposing those conditions.

Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

Equalities and Human Rights

Section 149 of the Equalities Act 2010, requires the Council, in considering planning applications to have due regard to the need to eliminate discrimination, advance equality of opportunities and foster good relations between people who have different protected characteristics. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The requirement to have due regard to the above goals means that members should consider whether persons with particular protected characteristics would be affected by a proposal when compared to persons who do not share that protected characteristic. Where equalities issues arise, members should weigh up the equalities impact of the proposals against the other material considerations relating to the planning application. Equalities impacts are not necessarily decisive, but the objective of advancing equalities must be taken into account in weighing up the merits of an application. The weight to be given to any equalities issues is a matter for the decision maker to determine in all of the circumstances

Members should also consider whether a planning decision would affect human rights, in particular the right to a fair hearing, the right to respect for private and family life, the protection of property and the prohibition of discrimination. Any decision must be proportionate and achieve a fair balance between private interests and the public interest.

9. Observations of the Director of Finance

Not applicable.

10. CONCLUSION

It is considered that the extension of the operation of an existing Civic Amenity Site from 28 days per year to full time operation for a temporary 5 year period is acceptable on this IBA site. Although there have been two refusals of planning permission for the redevelopment of the much larger Coal Yard site to provide a materials recovery and recycling facility and Civic Amenity Site, these proposals were for a much larger and intensive operation that involved greater waste tonnages and HGV movements. Reasons for refusal on both these applications included inadequate information as regards the traffic impacts and the access which involves using an open level crossing. By comparison, this is for a much smaller scheme that will not involve the same level of impact. The Council's Highway Engineer has assessed the access and concludes that it will be able to serve the development now and into the future. Given the nature of the site and its relationship with surrounding residential properties and the management regime that would have to operate in order to comply with the Environmental Agency's Permit for the site, it is also considered that the site would not generate noise, dust and odours that would be likely to adversely affect the amenities of

surrounding residents.

The application is recommended for approval.

11. Reference Documents

National Planning Policy Framework (March 2012)

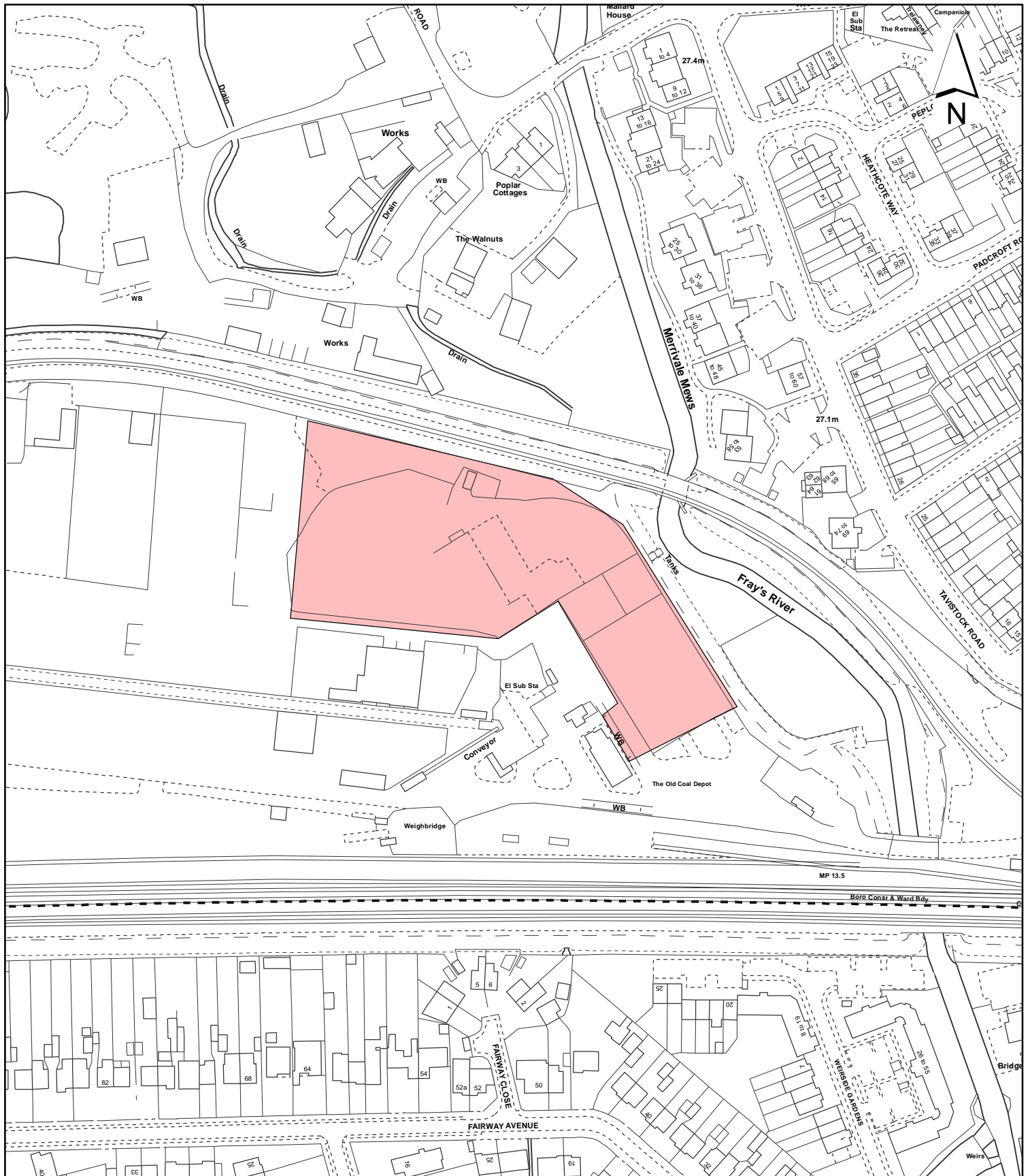
London Plan (March 2016)

Hillingdon Local Plan (November 2012)

West London Waste Plan (July 2015)

Contact Officer: Richard Phillips

Telephone No: 01895 250230



Notes:

 Site boundary

For identification purposes only.
 This copy has been made by or with the authority of the Head of Committee Services pursuant to section 47 of the Copyright, Designs and Patents Act 1988 (the Act).
 Unless the Act provides a relevant exception to copyright.
 © Crown copyright and database rights 2018 Ordnance Survey 100019283

Site Address:

Civic Amenity Site

Planning Application Ref:
18736/APP/2018/628

Planning Committee:
Major

Scale:
1:2,000

Date:
May 2018

LONDON BOROUGH OF HILLINGDON
 Residents Services
 Planning Section
 Civic Centre, Uxbridge, Middx. UB8 1UW
 Telephone No.: Uxbridge 250111

