

West London Waste Plan

Potential Sites Assessment

Technical Report

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Produced for
London Borough of Hillingdon

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1 Introduction

To enable the selection of potential sites for hosting new or upgraded waste management facilities in the six west London boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames, the following stages were undertaken:

- Establish a long list of sites;
- Establish site assessment criteria;
- Assess sites against criteria; and
- Create a shortlist of potential sites.

Planning Policy Statement 10 (PPS10)¹ states that sites must be allocated to support the pattern of waste management facilities set out in the regional spatial strategy (RSS). The London Plan² is the relevant RSS for London and sets out the broad locations which are considered suitable for locating waste management facilities.

The London Plan has a number of policies which guide the allocation of waste sites:

- Policy 4A.22 Spatial policies for waste management;
- Policy 4A.23 Criteria for the selection of sites for waste management and disposal;
- Policy 4A.24 Existing provision – capacity, intensification, re-use and protection; and
- Policy 4A.27 Broad locations suitable for recycling and waste treatment facilities.

These policies are then used in the development of the long (and short) list of potential sites for west London.

¹ *Planning Policy Statement 10: Planning for Sustainable Waste Management (2006) Communities and Local Government www.communities.gov.uk*

² *The London Plan (Spatial Development Strategy for Greater London)(Consolidated with alterations since 2004) Greater London Authority, February 2008*

2 Area of Search

2.1 Introduction

A number of sources of information were used to establish a long list of potential sites, namely:

- The broad locations suitable for recycling and waste treatment facilities suggested in Policy 4A.27 of the London Plan, which are:
 - Strategic Industrial Locations (Preferred Industrial Locations and Industrial Business Parks),
 - Local Employment Areas identified in borough Development Plans, and
 - Existing licensed and exempt waste management facilities;
- Sites suggested through public consultation.
- Sites suggested through a Call for Sites

2.2 London Plan

The London Plan identifies Preferred Industrial Locations (PILs) and Industrial Business Parks (IBPs) as broadly suitable for waste management facilities. All PILs and IBPs within the Plan area are included in the long list. The sites identified in the west London area are listed in Table 2 1.

Table 2-1: Broad locations suitable for waste management use identified in the London Plan

Broad Location	Borough	Type of Site
Staples Corner	Brent/Barnet	Preferred Industrial Location
Wembley and Neasden	Brent	Preferred Industrial Location
Park Royal	Brent/Ealing/Hammersmith & Fulham	Preferred Industrial Location/Industrial Business Park
Northolt, Greenford, Perivale	Ealing	Preferred Industrial Location
Great Western Road	Ealing	Preferred Industrial Location
Hayes Industrial Area	Hillingdon	Preferred Industrial Location
North Uxbridge Industrial Estate	Hillingdon	Industrial Business Park

2.3 Local Employment Areas

The term 'Local Employment Areas' has been interpreted locally by the boroughs as employment sites and opportunity areas suitable for industrial use. Each of the boroughs identified sites designated for industrial employment use in their current Local Development Frameworks. In total 116 sites were identified (Table 2-2).

Table 2-2: Local Employment Areas in west London

Area Title	Borough	Designation
Alperton	Brent	Borough Employment Area
Brentfield Road	Brent	Borough Employment Area
Church End	Brent	Borough Employment Area
Cricklewood	Brent	Borough Employment Area
Colindale	Brent	Borough Employment Area
Honeypot Lane	Brent	Borough Employment Area
Kingsbury	Brent	Borough Employment Area
Brent Crescent	Ealing	Major Employment Location
Westgate	Ealing	Major Employment Location
The Vale	Ealing	Major Employment Location
South Acton	Ealing	Major Employment Location
Park Royal	Ealing	Major Employment Location
Trumper Ways	Ealing	Major Employment Location
Northolt	Ealing	Major Employment Location
Perivale	Ealing	Major Employment Location
Southbridge Way	Ealing	Major Employment Location
Great Western	Ealing	Major Employment Location
International Trading Estate	Ealing	Major Employment Location
Greenford Road, Greenford	Ealing	Employment Site
Kingsbridge Crescent	Ealing	Employment Site
Merrick Road	Ealing	Employment Site
Poplar Avenue	Ealing	Employment Site
Manor Road	Ealing	Employment Site
Alexandria Road	Ealing	Employment Site
Northfields Avenue	Ealing	Employment Site
Popes Lane	Ealing	Employment Site
Queens Drive	Ealing	Employment Site
Cunnington Street	Ealing	Employment Site

Area Title	Borough	Designation
Acton Goods Yard, Horn Lane	Ealing	Employment Site
Horn Lane	Ealing	Employment Site
Bilton Road, Perivale	Ealing	Employment Site
Barratt Way Industrial Estate, Tudor Road, Wealdstone	Harrow	Industrial and Business Use Areas
Christchurch Industrial Estate/Harrow Council Depot, Wealdstone	Harrow	Industrial and Business Use Areas
Tudor Enterprise Park, Tudor Road, Wealdstone	Harrow	Industrial and Business Use Areas
Colart Fine Art and Graphics site, Wealdstone	Harrow	Industrial and Business Use Areas
Crystal Centre, Elmgrove Road, Harrow	Harrow	Industrial and Business Use Areas
Hawthorne Centre, Elmgrove Road, Harrow	Harrow	Industrial and Business Use Areas
Dalston Gardens (off Honeypot Lane) Stanmore	Harrow	Industrial and Business Use Areas
Parr Road/Garland Road (off Honeypot Lane), Stanmore	Harrow	Industrial and Business Use Areas
Kodak site, Wealdstone	Harrow	Industrial and Business Use Areas
Palmerston Road / Oxford Road area, Wealdstone	Harrow	Industrial and Business Use Areas
Rosslyn Crescent, off Station Road, Harrow	Harrow	Industrial and Business Use Areas
Waverley Industrial Park, Hailsham Drive, Wealdstone	Harrow	Industrial and Business Use Areas
Whitefriars Industrial Estate, Tudor road, Wealdstone	Harrow	Industrial and Business Use Areas
BR Goods Yard, Cecil Road, Wealdstone	Harrow	Industrial and Business Use Areas
Barratt Way Industrial Estate, Tudor Road, Wealdstone	Harrow	Industrial and Business Use Areas
Christchurch Industrial Estate/ Harrow Council depot, Wealdstone	Harrow	Industrial and Business Use Areas
Tudor Enterprise Park, Tudor Road, Wealdstone	Harrow	Industrial and Business Use Areas
Brember Road industrial estate, South Harrow;	Harrow	Industrial and Business Use Areas
Neptune Road Industrial Estate	Harrow	Industrial and Business Use Areas
Brember Road Industrial Estate, South Harrow	Harrow	Industrial and Business Use Areas

Area Title	Borough	Designation
Chantry Place, Hatch End	Harrow	Industrial and Business Use Areas
Uxbridge Industrial Estate	Hillingdon	Industrial Business Areas
Stonefield Way/Victoria Road, Ruislip	Hillingdon	Industrial Business Areas
Packet Boat Lane Industrial Area, Cowley	Hillingdon	Industrial Business Areas
Bath Road, Heathrow – Skyport Drive	Hillingdon	Industrial Business Areas
Bath Road, Heathrow – Polar Park	Hillingdon	Industrial Business Areas
Covert Farm, Bedfont	Hillingdon	Industrial Business Areas
Braintree Road Industrial Area, South Ruislip	Hillingdon	Industrial Business Areas
Trout Road Industrial Area	Hillingdon	Industrial Business Areas
Eastcote Industrial Estate	Hillingdon	Industrial Business Areas
Saxon Trading Estate	Hillingdon	Industrial Business Areas
Summerhouse Lane, Harefield	Hillingdon	Industrial Business Areas
Braintree Road Industrial Area	Hillingdon	Industrial Business Areas
Tavistock Road, West Drayton	Hillingdon	Industrial Business Areas
Bulls Bridge, Hayes	Hillingdon	Industrial Business Areas
Ascot Road Industrial Estate	Hounslow	Locally Significant Industrial Site
Cargo Service Centre	Hounslow	Locally Significant Industrial Site
Ashford Industrial Estate	Hounslow	Locally Significant Industrial Site
Challenge Road Industrial Estate	Hounslow	Locally Significant Industrial Site
Bedfont North Industrial Park	Hounslow	Locally Significant Industrial Site
Maple Industrial Estate	Hounslow	Locally Significant Industrial Site
Feltham Corporate Centre	Hounslow	Locally Significant Industrial Site
Plane Tree Crescent	Hounslow	Locally Significant Industrial Site
Five Ways Business Centre	Hounslow	Locally Significant Industrial Site
Felthambrook Industrial Location	Hounslow	Locally Significant Industrial Site
Hanworth Trading Estate	Hounslow	Locally Significant Industrial Site
Popham Close	Hounslow	Locally Significant Industrial Site
Feltham Marshalling Yards	Hounslow	Locally Significant Industrial Site
Radius Park	Hounslow	Locally Significant Industrial Site
Sun Life Trading Centre	Hounslow	Locally Significant Industrial Site
Heathrow Causeway Estate	Hounslow	Locally Significant Industrial Site
Haslemere Heathrow Industrial Estate	Hounslow	Locally Significant Industrial Site
Heathrow International Trading Estate	Hounslow	Locally Significant Industrial Site

Area Title	Borough	Designation
Prologis Park	Hounslow	Locally Significant Industrial Site
Parkway Trading Estate	Hounslow	Locally Significant Industrial Site
Heston Industrial Estate	Hounslow	Locally Significant Industrial Site
Heston Phoenix Distribution Park	Hounslow	Locally Significant Industrial Site
Victory Way	Hounslow	Locally Significant Industrial Site
The Heston Centre	Hounslow	Locally Significant Industrial Site
Spitfire Estate	Hounslow	Locally Significant Industrial Site
Airlinks Industrial Estate	Hounslow	Locally Significant Industrial Site
Harlequin Centre	Hounslow	Locally Significant Industrial Site
Serco	Hounslow	Locally Significant Industrial Site
Bulls Bridge Industrial Estate	Hounslow	Locally Significant Industrial Site
Worton Hall Industrial Estate	Hounslow	Locally Significant Industrial Site
Victory Business Centre	Hounslow	Locally Significant Industrial Site
Clock Tower Road Industrial Estate	Hounslow	Locally Significant Industrial Site
Phoenix Trading Park	Hounslow	Locally Significant Industrial Site
Kew Bridge Distribution Centre	Hounslow	Locally Significant Industrial Site
Power Road Industrial Estate	Hounslow	Locally Significant Industrial Site
Bollo Lane Industrial Estate	Hounslow	Locally Significant Industrial Site
Orchard Road/Market Road, Lower Richmond Road	Richmond	Proposal Sites
St Margarets Business Centre, Winchester Rd/ Moor Mead Rd, Twickenham	Richmond	Proposal Sites
Heathlands Industrial Estate, Heath Rd, Twickenham	Richmond	Proposal Sites
West Twickenham/Hamilton Road/Norcutt Rd/Gould Road	Richmond	Proposal Sites
Mereway Centre, Mereway Road/ Rowntree Rd, Twickenham	Richmond	Proposal Sites
St George's Industrial Estate, The Green, Twickenham	Richmond	Proposal Sites
Teddington Business Park, Station Rd, Teddington	Richmond	Proposal Sites
St Clare Business Park, Holly Rd, Hampton Hill	Richmond	Proposal Sites
Port Hampton, Platts Eyott, Hampton	Richmond	Proposal Sites
Kingsway Business Park/ Sandfield	Richmond	Proposal Sites

Area Title	Borough	Designation
Industrial Estate, Oldfield Rd, Hampton		
Budweiser Stag Brewing Co, Lower Richmond Road, Mortlake,	Richmond	Proposal Sites
Third Cross Road, Twickenham	Richmond	Proposal Sites
Marlborough Trading Estate, 159 Mortlake Road	Richmond	Proposal Sites
Thames Water, Hampton Water Treatment Works	Richmond	Proposal Sites

2.4 Licensed and Exempt Waste Management Facilities

To establish a list of licensed waste management facilities in the West London Waste Plan (WLWP) area, records of all such facilities were obtained from the Environment Agency. Relevant exempt facilities handling large quantities of waste and recycled aggregates were also included in the list (Table 2-3). Some specific types of waste management operations do not require an Environmental Permit (formerly known as a Waste Management Licence) and are therefore registered with the Environment Agency as exempt activities/facilities. Exemptions for companies dealing with or storing their own waste on site were not included in the list, for example pharmacies and mobile phone shops that store returned products for recycling. Policy 4A.24 of the London Plan states that all existing waste sites should be safeguarded and their use re-orientated or intensified where possible.

Table 2-3: Existing waste management facilities in west London to be safeguarded

Site	Borough	Type of Site
Twyford Waste Transfer Station	Brent	Transfer Station
Veolia/Brent Transfer Station & Depot	Brent	Transfer Station
Ace Waste - Neasden Goods Yard	Brent	Transfer Station
Wembley Transfer Station & Recycling Facility	Brent	Transfer Station
Fifth Way, Wembley (2)	Brent	Transfer Station
Powerday	Brent	Transfer Station
Ace Waste - Neasden Goods Yard	Brent	Transfer Station
William Fry Neasden	Brent	Metal Recycling Site
Fourth Way, Wembley	Brent	Transfer Station
Glynns Waste	Brent	Metal Recycling Site
L & B Haulage, Neasden	Brent	Transfer Station
Ace Waste 2	Brent	Transfer Station
Wembley Car Breakers	Brent	Metal Recycling Site

Site	Borough	Type of Site
Waste Skips	Brent	Transfer Station
Bardon Aggregates	Brent	Exempt Site
Green-works	Brent	Exempt Site
TRAID	Brent	Exempt Site
Keanes Environmental Ltd	Brent	Exempt Site
Canon Hygiene	Ealing	Transfer Station
Yeoman Aggregates Ltd	Ealing	Physical Treatment Facility
Quattro Park Royal	Ealing	Transfer Station
Gowing & Pursey, Horn Lane	Ealing	Transfer Station
Coronation Road, Park Royal	Ealing	Transfer Station
London Auto Parts Limited	Ealing	Metal Recycling Site
E T D, Chase Road	Ealing	Transfer Station
Acton Waste & Recycling Centre	Ealing	Transfer Station
Greenford Waste Transfer Station	Ealing	Transfer Station
Simpsons - Atlas Road, Park Royal	Ealing	Transfer Station
Greenford HWRC	Ealing	Transfer Station
Southall Waste & Recycling Centre	Ealing	Transfer Station
Greenford Depot	Ealing	Transfer Station
Thamesdown Glass Recycling	Ealing	Exempt Site
Horn Lane Metals	Ealing	Exempt Site
Greener World Ltd	Ealing	Exempt Site
Hansons Aggregates site, Acton Main Line Depot	Ealing	Exempt Site
Forward Drive CA Site	Harrow	Household Waste Recycling Centre
Paxton Recycling - Wealdstone	Harrow	Transfer Station
Harrow Breakers	Harrow	Metal Recycling Site
Rigby Lane, Hayes	Hillingdon	Transfer Station
Victoria Road Waste Transfer Station	Hillingdon	Transfer Station
Pump Lane, Hayes	Hillingdon	Transfer Station
Hillingdon Waste Transfer Station	Hillingdon	Transfer Station
SITA Holloway Lane MRF 2	Hillingdon	Materials Recycling Facility
SITA Holloway Lane MRF 1	Hillingdon	Materials Recycling Facility
Cranford Lane TS, Heathrow	Hillingdon	Transfer Station
Hayes	Hillingdon	Transfer Station

Site	Borough	Type of Site
Metronet Ruislip Depot West	Hillingdon	Transfer Station
Harvil Road, Harefield	Hillingdon	Transfer Station
Kershire Construction West Ruislip	Hillingdon	Transfer Station
Car Spares of West Drayton Ltd	Hillingdon	Metal Recycling Site
Country Composts Ltd	Hillingdon	Composting Facility
Wallingford Road, Uxbridge	Hillingdon	Transfer Station
Hillingdon CA Site	Hillingdon	Household Waste Recycling Centre
Trout Lane Depot, Yiewsley	Hillingdon	Transfer Station
Allens Yard, Hayes	Hillingdon	Transfer Station
Heps Oil	Hillingdon	Transfer Station
West London Composting	Hillingdon	Composting Facility
West London Composting	Hillingdon	Composting Facility
SRCL Ltd	Hillingdon	Clinical Treatment Facility
Tarmac Ltd	Hillingdon	Exempt Site
Severnside Recycling Wallingford Road	Hillingdon	Exempt Site
Iver Recycling Holloway Lane	Hillingdon	Exempt Site
Drinkwater Sabey Limited	Hillingdon	Exempt Site
Mr L D Hartland	Hillingdon	Exempt Site
Automotive Environmental Services Ltd	Hillingdon	Exempt Site
J Ellis And M Stevens T/a Heathrow Car Spares	Hillingdon	Exempt Site
BFA Recycling	Hillingdon	Exempt Site
BFI Ltd	Hillingdon	Exempt Site
Transport Avenue Transfer Station	Hounslow	Transfer Station
Ron Smith Recycling Ltd	Hounslow	Transfer Station
Mayer Parry Recycling Ltd	Hounslow	Metal Recycling Site
Space Waye Civic Amenity Site	Hounslow	Household Waste Recycling Centre
Rentokil – Brentford	Hounslow	Transfer Station
Veolia ES Cleanaway (UK) Ltd	Hounslow	Transfer Station
Dave Car Spares, Green Lane	Hounslow	Metal Recycling Site
Heathrow Japanese Spares Ltd	Hounslow	Metal Recycling Site

Site	Borough	Type of Site
Pears Road, Hounslow	Hounslow	Transfer Station
Thames Water	Hounslow	Sludge Treatment
Hounslow Homes	Hounslow	Transfer Station
Quattro Brentford	Hounslow	Transfer Station
Day Aggregates	Hounslow	Exempt Site
T Holloway & Sons (Metals)	Hounslow	Exempt Site
Townmead CA Site	Richmond	Transfer Station
Arlington Works	Richmond	Transfer Station
Twickenham Depot	Richmond	Exempt Site
M Sullivan (Metals)	Richmond	Exempt Site
Thames Water Kew	Richmond	Exempt Site

2.5 Sites Suggested through Public Consultation

The following additional sites (Table 2-4) were identified during the public consultation process, through the following methods:

- Six workshops, one in each of the boroughs, incorporating facilitated discussion of some of the key issues and options. Residents and organisations on the consultation databases of the six boroughs' planning departments were invited to the workshops. The workshops were also advertised in local newspapers and a press release resulted in additional press coverage.
- A questionnaire seeking responses on the issues and options was included within the Issues and Options report. An interactive electronic version of the questionnaire was also provided for completion online, and the questionnaires were also made available for download from the website.
- The project team have also visited a small number of local groups and organisations to discuss the issues and options. The opportunity for such meetings was advertised via the project website and the workshops.
- Written and email feedback was invited via the information leaflet and poster, project website and the workshops.

Table 2-4: Sites suggested during Issues and Options consultation process

Site	Borough
Former Guinness brewery site	Brent
Gas Works site	Ealing
Spiral Mounds Northolt	Ealing
Kodak site	Harrow
Farmlands south of Northolt aerodrome	Hillingdon
Brownfield site west of Yiewsley	Hillingdon
Land east of West Drayton station	Hillingdon
Tavistock site	Hillingdon
Taplin site	Hillingdon
Packet Boat Lane	Hillingdon
Site off New Year's Green Lane, Harefield	Hillingdon
RAF site, Porters Way	Hillingdon
RAF Uxbridge	Hillingdon
SITA Holloway Close	Hillingdon
Commerce Road, Brentford	Hounslow

2.6 Sites Suggested through Call for Site

The following additional sites (Table 2-5) were identified during the public Call for Sites process.

Table 2-5: Sites suggested during Call for Sites process

Site	Borough
Former Powergen site, Bulls Bridge	Hillingdon
Station Approach, Greenford	Ealing

2.7 Site boundary information

To enable each site to be assessed using the site assessment criteria, site boundaries were obtained. Existing waste management site boundaries were obtained from waste management licences/Environmental Permits held and complied by the Environment Agency. These areas were identified on there application for a permit or licence.

3 Assessment Methodology

3.1 Introduction

In paragraphs 20 and 21, PPS10 provides a clear set of expectations as to the range of issues that need to be considered in identifying and assessing sites for waste management use. These include:

1. To consider opportunities for on-site management of waste where it arises.
2. To consider opportunities to co-locate facilities together and with complimentary activities, reflecting the concept of resource recovery parks.
3. The extent to which they support the policies in PPS10.
4. The cumulative effect of previous waste facilities on the wellbeing of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential.
5. The capacity of existing and proposed transport infrastructure to support the sustainable movement of waste, and products arising from resource recovery, seeking when practicable and beneficial to use modes other than road transport.
6. To give priority to the re-use of previously developed land, and redundant agricultural and forestry buildings and their curtilages.
7. The physical and environmental constraints on development including existing and proposed uses of neighbouring land. These 'locational criteria' are given at Annex E of PPS10 as:
 - b) Protection of water resources
 - c) Land instability
 - d) Visual intrusion
 - e) Nature conservation
 - f) Historic environment and built heritage
 - g) Traffic and access
 - h) Air emissions including dust

- i) Odours
- j) Vermin and birds
- k) Noise and vibration
- l) Litter
- m) Potential land use conflict

The London Plan (Policy 4A.23) sets out criteria for the selection of sites for waste management and disposal as follows:

- proximity to source of waste;
- the nature of the activity proposed and its scale;
- the environmental impact on surrounding areas, particularly noise emissions, odour and visual impact and impact on water resources
- the full transport impact of all collection, transfer and disposal movements, particularly maximising the potential use of rail and water transport;
- primarily using sites that are located on Preferred Industrial Locations or existing waste management locations; and
- Wherever possible, opportunities should be taken to include provision for Combined Heat and Power and Combined Cooling Heat and Power and to accommodate various related facilities on a single site (resource recovery parks / consolidation centres).

The site assessment criteria to determine suitable sites for waste management in West London were derived from PPS10 guidance, responses to the Issues and Options consultation, sustainability appraisal objectives and discussion with Borough Planning Officers and Members Groups.

The sites were assessed against a series of criteria using a combination of computer based and manual scoring. The computer based scoring uses Geographical Information System (GIS) layers for each criterion and the sites are scored based on proximity to each layer. The manual scoring involved professional judgement on a range of criteria undertaken during site visits.

The site assessment criteria consisted of a three stage process:

- Absolute Constraints
- Constraints Assessment (using GIS)

- Site based assessment

3.2 Absolute Constraints

The land designations and features identified as absolute constraints are protected by National and/or European and other International policies. The successful development of waste management facilities within these land designations is considered unlikely. Therefore, the location of a site within one of these areas resulted in the site being immediately excluded from the site selection process. However for the purposes of maintaining an audit trail all sites were taken through the complete assessment process.

Table 3-1: Policy justification for Absolute Constraints site criteria

Criteria	Justification	Source
Site of Special Scientific Interest (SSSI)	Sites of Special Scientific Interest (SSSI) are statutorily designated sites which show the best examples of our natural heritage of wildlife habitats, geological features and landforms. A SSSI is an area that has been notified as being of special interest under the Wildlife and Countryside Act 1981. Areas designated as SSSIs should receive the highest possible planning protection as outlined in Planning Policy Statement 9: Biodiversity and Geological Conservation (PPS9).	Natural England
Special Areas of Conservation (SAC)	SACs are areas which have been given special protection under the European Union's Habitats Directive. All terrestrial SACs in England are also Sites of Special Scientific Interest (SSSIs). The additional SAC designation is recognition that some or all of the wildlife and habitats are particularly valued in a European context.	Natural England
Special Protection Area (SPA)	Special Protection Areas (SPAs) are strictly protected sites classified in accordance with the European Union's Directive on the Conservation of Wild Birds (79/409/EEC), also known as the Birds Directive, which came into force in April 1979. All SPAs hold a SSSI status and are therefore afforded extra protection.	Natural England
Ramsar sites	Wetlands of International Importance, designated under the Ramsar Convention 1971. As a matter of policy, Ramsar sites in England are protected as European sites (as set out in the Conservation (Natural Habitats, etc.) Regulations 1994 (as amended). The vast majority are also classified as SPAs and	Natural England

Criteria	Justification	Source
	all terrestrial Ramsar sites in England are also notified as Sites of Special Scientific Interest (SSSIs).	
National Nature Reserve	Natural England is the body empowered to declare NNRs in England, the Reserves being a selection of the very best parts of England's Sites of Special Scientific Interest. It is this underlying designation which gives NNRs their strong legal protection. The majority also have European nature conservation designations.	Natural England
Sites of International or National important historic environment and built heritage:		Natural England/ English Heritage/Local Authority data
World Heritage Site	World Heritage Sites are places of 'outstanding universal value' selected by the United Nations Educational, Scientific and Cultural Organisation (UNESCO). Sites can be selected because they contain important cultural or natural features.	
Scheduled Ancient Monument	The Ancient Monuments and Archaeological Areas Act (1979) protects monuments whose preservation is given priority over other land uses.	
Conservation Area	Local Authorities have the power to designate as Conservation Areas in any area of 'special architectural or historic interest' whose character or appearance is worth protecting or enhancing. English Heritage can designate Conservation Areas in London, in consultation with the relevant London Borough Council. In exceptional circumstances the Secretary of State can also designate - usually where the area is of more than local interest.	
Listed Buildings	Listed buildings have statutory protection through the Planning (Listed Buildings and Conservation Areas) Act 1990. Listing identifies only those buildings which are of national 'special interest'.	
Registered Historic Battlefields	The English Heritage Register of Historic Battlefields identifies forty-three important English battlefields. Its purpose is to offer them protection and to promote a better understanding of their significance.	
Registered Parks and Gardens	English Heritage is enabled by Section 8C of the Historic Buildings and Ancient Monuments Act 1953 (inserted by section 33	

Criteria	Justification	Source
	of, and paragraph 10 of Section 4, to the National Heritage Act 1983) to compile the Register of Parks and Gardens of special historic interest in England. The main purpose of this register is to help ensure that the features and qualities which make the landscapes so listed of national importance are safeguarded during ongoing management or if any change is being considered which could affect them.	
Greenfield sites located within Flood Zone 3b	Planning Policy Statement 25: Development and Flood Risk (PPS25) requires Local Authorities to take a risk based approach to proposals for development in or affecting flood-risk areas. Flood Zone 3b is the Functional Floodplain and comprises land where water has to flow or be stored in times of flood.	Local Authority contracted surveys and site inspections
Crossrail Safeguarded areas	Areas of land to be safeguarded for the development of Crossrail	Crossrail
Sites less than 0.5 hectares in area	Sites less than 0.5 hectares in area were deemed to be less than optimal for waste management uses.	

3.3 Constraints

The sites were assessed against proximity to the list of constraints using a GIS approach. The site boundaries and GIS layers relevant to each criterion were entered into a GIS which scored each site against the criterion according to the agreed scoring system. The criteria and relevant scoring approach consisted of:

3.3.1 Green Belt, Metropolitan Open Land (MOL) and Open Space

PPG2: Green Belts states there are five purposes of including land in the Green Belt which are as follows:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns from merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraph 3 of PPS10 recommends that areas of Green Belt are protected but recognises that particular locational needs may justify development of certain waste management facilities. However, paragraph 3.4 in Planning Policy Guidance 2 states;

“The construction of new buildings inside a Green Belt is inappropriate unless it is for the following purposes:

- agriculture and forestry (unless permitted development rights have been withdrawn – see paragraph D2 of Annex D);
- essential facilities for outdoor sport and outdoor recreation, for cemeteries, and for other uses of land which preserve the openness of the Green Belt and which do not conflict with the purposes of including land in it (see paragraph 3.5 below);
- limited extension, alteration or replacement of existing dwellings (subject to paragraph 3.6 below);
- limited infilling in existing villages (under the circumstances described in the box following paragraph 2.11), and limited affordable housing for local community needs under development plan policies according with PPG3 (see Annex E, and the box following paragraph 2.11); or
- limited infilling or redevelopment of major existing developed sites identified in adopted local plans, which meets the criteria in paragraph C3 or C4 of Annex C1”

Policy 3D.9 of the London Plan recognises that development should not be approved in the Green Belt except in very special circumstances. London Plan Policy 3D.10 affords MOL the same level of protection as Green Belt and states that essential facilities for appropriate uses will only be acceptable where they do not have an adverse impact on the openness of the MOL.

Also within this criterion is open space which includes the boroughs’ designated open space, public open space, green chains, green corridors, educational open space, allotments and caravan sites. These areas provide a valuable local amenity area which is particularly important within urban areas. Policy 3D.11 of the London Plan encourages the protection of such land.

To reflect the importance of these designations the site scoring will be as outlined in Table 3-2.

Table 3-2: Green Belt, MOL and Open Space scoring

Score	Location
5	Site is not located within Green Belt, Open Space or Metropolitan Open Land
1	Site is located within Green Belt, Open Space or Metropolitan Open Land

3.3.2 *Environment Agency Flood Zone*

PPS25³ states that 'In areas at risk of river or sea flooding, preference should be given to locating new development in Flood Zone 1. If there is no reasonably available site in Flood Zone 1, the flood vulnerability of the proposed development can be taken into account in locating development in Flood Zone 2 and then Flood Zone 3.' Accordingly, sites which have lower risk of flooding are therefore given a higher score to reflect the fact that these are more suitable for the development of waste management facilities.

Table 3-3: Flood Zone scoring

Score	Location
5	Site within Flood Zone 1
3	Site within Flood Zone 2
1	Site within Flood Zone 3a or is a Brownfield site in Flood Zone 3b

³ *Planning Policy Statement 25: Development and Flood Risk (2006) Communities and Local Government, www.communities.gov.uk*

3.3.3 Ground Water Source Protection Zones (SPZs)

PPS10 states 'considerations will include the proximity of vulnerable surface and groundwater.' In accordance with this, sites were scored using the criteria defined in Table 3-4.

Table 3-4: Ground Water Source Protection Zone Scoring

Score	Location
5	Site is located within the catchment area (SPZ3) or is not located in any SPZ area
3	Site is located within the outer core (SPZ2)
1	Site is located within the inner core (SPZ1)

3.3.4 Sustainable Transport

PPS10 states that any site assessment should assess sites against the proximity to existing transport infrastructure to support sustainable movements of waste. In the development of the WLWP this has been interpreted as access to railheads or potential railheads⁴ and navigable waterways.

Table 3-5: Sustainable transport scoring

Score	Location
5	Site has established access to railhead or navigable waterway
3	Site is less than 500m from railhead or navigable waterway or has potential for access.
1	Site is 500m or greater from a railhead or navigable waterway

3.3.5 Transport for London Road Network (TLRN)/ Strategic Road Network (SRN)

PPS10 states 'Considerations will include the suitability of the road network and the extent to which access would require reliance on local roads.'

Sites nearer to major trunk roads are considered more favourably than sites further away from such routes so that routing of vehicles to and from sites is more likely to be on suitable roads and less likely to impact on local or residential roads. The distances chosen reflect the urban environment in west London.

⁴ Rail Freight Strategy, Rail Freight Sites List Guidance note, Transport for London 2007

Table 3-6: Transport for London Road Network / Strategic Road Network scoring

Score	Location
5	Site is less than 250m from or has direct access to TLRN/SRN
3	Site is between 500m and 250m from TLRN/SRN
1	Site is greater than 500m from TLRN/SRN

3.3.6 Public Rights of Way (PROW)

Public Rights of Way (PROW) are protected by the Countryside and Rights of Way Act 2000. Site scores are determined on the basis that a site containing a PROW will present more difficulty in deliverability as the PROW may have to be diverted and/or access granted to the site to maintain the PROW.

Table 3-7: Public Rights of Way scoring

Score	Location
5	There are no Public Rights of Way across the site
1	There are Public Rights of Way across the site

3.3.7 Local Conservation Areas (LCA)

Local Planning Authorities have a duty, in exercising their planning powers, to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. The distances used reflect the urban environment within west London.

Table 3-8: Local Conservation Areas scoring

Score	Location
5	Site is 100m or greater from a Conservation Area
3	Site is within 100m of a Conservation Area.
1	Site or part of site is in a Conservation Area

3.3.8 Nature Conservation Areas

PPS10 states 'considerations will include any adverse effect on a site of international importance for nature conservation (Special Protection Areas, Special Areas of Conservation and Ramsar Sites) or a site with a nationally recognised designation (Sites of Special Scientific Interest, National Nature Reserves).'

Table 3-9: Nature Conservation Areas scoring

Score	Location
5	Site is greater than 1km from internationally/nationally designated site
3	Site is greater than 500m and less than 1km from internationally/nationally designated site
1	Site is less than 500m from internationally/nationally designated site

3.3.9 Locally important nature conservation areas

The use of these designations and the scoring reflects their local importance. Sites of Importance to Nature Conservation (SINCs) have no statutory protection and development on or near SINCs may require mitigation to protect the SINC. Local Nature Reserves are a statutory declaration and must be managed to maintain their special features. Ancient woodland is not a statutory designation. Distances chosen reflect the need to protect and/or mitigate against negative impact on such areas.

Table 3-10: Locally important nature conservation areas scoring

Score	Location
5	Site is 100m or greater from a locally important nature conservation area.
3	Site is within 100m of a locally important nature conservation area.
1	Site or part of site is within a locally important nature conservation area.

3.3.10 Archaeological sites

Planning Policy Guidance 16 – Archaeology and Planning (PPG16)⁵ states 'Development plans should reconcile the need for development with the interests of conservation including archaeology. Detailed development plans should include policies for the protection, enhancement and preservation of sites of archaeological interest and of their settings.'

⁵ Planning Policy Guidance 16 – Archaeology and Planning (PPG16) (1990) Communities and Local Government www.communities.gov.uk

Table 3-11: Archaeological site scoring

Score	Location
5	Site contains no known archaeological sites.
3	Site contains known archaeological site.
1	Site contains nationally or regionally important archaeological site

3.3.11 Historic Environment and Built Heritage

PPS10 states 'considerations will include any adverse effect on a site of international importance (World Heritage sites) or a site or building with a nationally recognised designation (Scheduled Ancient Monuments, Conservation Areas, Listed Buildings, Registered Historic Battlefields and Registered Parks and Gardens)'

Table 3-12: Historic Environment and Built Heritage

Score	Location
5	Site is greater than 1km from internationally/nationally designated site
3	Site is greater than 500m and less than 1km from internationally/nationally designated site
1	Site is less than 500m from internationally/nationally designated site

3.3.12 Strategic/Protected Views

Where boroughs have adopted locally important views, these have been included as a constraint to preserve the view.

Table 3-13: Strategic/Protected views scoring

Score	Location
5	Site is not within a strategic or protected view
1	Site is within a strategic or protected view

3.3.13 Land Stability

Annex E of PPS10 lists land instability as a criterion for sites assessment. Whilst it is encouraged that waste management facilities are developed on brownfield or previously developed land, it is not necessarily suitable to build on areas where landfill activity has previously taken place.

Table 3-14: Land Stability scoring

Score	Location
5	Site is not over mine workings/underground workings/old landfill sites
3	Site is within 250m of mine workings/underground workings/old landfill sites
1	Site is over mine workings/underground workings/old landfill sites

3.3.14 Criteria Not Considered

The following criteria were removed from the scoring methodology for the reasons stated:

- Aerodrome Safety: criterion removed. Aerodrome issues will be dealt with at planning application stage
- Air Quality Management Areas: criterion removed as all but 2 west London boroughs are designated AQMAs.
- Controlled Waters: criterion removed as all new facilities will be required to have sufficient measures to protect controlled waters. Requirements will be set out in policies.
- Sensitive Receptors: criterion removed as visual inspection at site visit stage is more specific and appropriate.
- Decentralised energy opportunities: criterion removed as requirements will be set out in policies

3.4 Site Based Assessment

To further assess the suitability of the site a site based assessment was conducted where a number of criteria were assessed. This involved a physical inspection of the site and evaluation of its potential against a number of scored criteria. Sites were scored on the following criteria:

3.4.1 Site Configuration

An assessment was made of the layout of the site with regard to suitability of the ground surface and whether the land had been previously developed.

Table 3-15: Site Configuration scoring

Score	Location
5	Site requires no change to existing layout
3	Site requires only minor modifications to existing layout
1	Site requires significant changes to site layout

3.4.2 Existing uses/buildings on site

An assessment was made on the type, size and layout of existing buildings on site and whether they were compatible with waste uses e.g. an industrial warehouse would be compatible with waste use.

Table 3-16: Existing Uses/Building on Site scoring

Score	Location
5	Existing uses/buildings compatible with feasible waste development
3	Existing uses/buildings require only minor modifications to be compatible with feasible waste development
1	Existing site uses/buildings incompatible with feasible waste development

3.4.3 Proximity to residential areas, schools and hospitals

An assessment was made on the impact of the site on local sensitive receptors. If the site was very close to residential areas an assessment was made on whether mitigation measures would reduce any potential impact on residents e.g. screening of site from sensitive receptors.

Table 3-17: Proximity to Residential Areas, Schools and Hospitals scoring

Score	Location
5	Site is not proximate to and/or would not negatively impact on residential areas, schools or hospitals
3	Site is proximate to and could impact negatively on residential areas, schools and hospitals
1	Site is proximate to and would negatively impact on residential areas, schools and hospitals

3.4.4 Vehicles Routing e.g. conflict with schools, residential areas and local amenity

Access to the site was assessed in terms of whether the site was currently accessed via residential roads or roads past other sensitive receptors e.g. schools.

Table 3-18: Routing of Vehicles to Site scoring

Score	Location
5	Given physical site access, the development of the site for waste use would not impact negatively on surrounding uses
3	Given physical site access, the development of the site for waste use could impact negatively on surrounding uses
1	Given physical site access, the development of the site for waste use would impact negatively on surrounding uses

3.4.5 Visual Intrusion on surrounding area

The visual intrusion on the immediate surrounding area was assessed on the basis of the land use in the area e.g. if the area is largely industrial the visual impact would be less than if the area was residential.

Table 3-19: Visual Intrusion on Surrounding Area scoring

Score	Location
5	The development of the site for waste use would not have any negative impact
3	The development of the site for waste use would have some negative impact, but this could be mitigated through appropriate design solutions
1	The development of the site for waste use would have a negative visual impact on surrounding area and where it would probably not be practicable to effectively mitigate through design

3.4.6 Potential for advantageous co-location of facilities with existing industrial, commercial or mixed use developments

The potential for co-location was based on whether there were existing industrial or commercial uses surrounding the site and on the size of the site itself. For example if the site was large then it could be feasible that waste facilities and industrial facilities could co-locate on the site.

Table 3-20: Potential for Advantageous Co-Location of Facilities scoring

Score	Location
5	The development of the site offers some potential for feasible co-location
1	The development of the site offers no feasible potential for co-location

3.4.7 *General commentary*

As part of the site assessment process a general commentary was provided for each site:

- A description of the character of the area surrounding the site;
- Potential impacts from development on the surrounding area which any development would need to mitigate against;
- Potential issues which any developer would need to invest in to enable the site to be developed e.g. if land is unstable due to previous excavation work;
- A comment on the appropriate scale of any new building, given the local context;
- A comment on how close the site is to potential waste arisings;
- A comment on whether the site is suitable for an open facility e.g. open windrow composting, and/or for an enclosed facility e.g. Materials Recovery Facility / In-Vessel Composting / Anaerobic Digestion etc; and
- If sites have particular issues with regard to the development of thermal treatment facilities, these will also be identified (e.g. open routes to provide infrastructure from the site to the nearest heat/power user, whether the height of any stack would be particularly intrusive, given the local context etc.).

3.5 **Site information sheets**

Site information sheets were produced for each site containing the following information:

- Site name and description;
- Location;
- Map;
- Scoring; and,
- Site assessment commentary.

4 Potential Sites

4.1 Scoring

Each site was scored against the criteria and a ranked list was produced. A full list of all sites considered and their scores can be found at Appendix 1.

4.2 Sensitivity Testing

Sensitivity testing was carried out for each site to check the scoring under the GIS scored criteria. The testing was required as some sites were scored as being located within a constraint when the site boundary and the constraint boundary were merely touching. The site scores affected by this were amended accordingly.

4.3 Weighting

In line with national and regional guidance some criteria may be considered more important than others and some criteria may have relevant local significance. To emphasize the importance of such criteria, weighting is applied to effectively double the score attributed to those criteria for every site. Within the West London Waste Plan the following criteria were weighted:

- Proximity to the Transport for London Road Network and Strategic Road Network;
- Routing of vehicles to site;
- Distance from residential areas, schools and hospitals; and,
- Proximity to sustainable transport options.

Proximity to the TLRN and SRN, distance from housing and schools and hospitals, proximity to sustainable transport and vehicle routing were weighted as important local criteria to ensure that waste facilities and their associated traffic movements do not have a detrimental effect on local people.

4.4 Land Requirement

The west London boroughs will provide sufficient land identified as being suitable for waste management purposes to meet the apportionment in terms of municipal solid waste and commercial waste arisings. The amount of land required to meet the apportionment has been calculated as 56 hectares. The background behind the calculation can be found at Appendix 2.

4.5 Potential deliverability constraints

PPS12⁶ (paragraph 4.28) states ‘it is essential that stakeholders key to the plan’s delivery are engaged early... early engagement with stakeholders may enable potential impediments to the plan to be identified and overcome’. The companion guide to PPS10⁷ (paragraph 7.26) also states ‘consideration should be given to any identified constraints to site deliverability’. At this stage, sites with potential deliverability constraints, including existing sites, were identified. Potential constraints included designation of the site for other uses or planning permission granted for other uses. Constraints were also identified where sites were affected by absolute criteria e.g. Crossrail safeguarded zone or area of less than 0.5 hectares.

The constituent boroughs of the West London Waste Plan, undertook a deliverability assessment of all the sites within the Plan. This assessment identified the new and existing sites suitable for future development as waste management sites (shown in Appendix 3 and 4).

4.6 Potential Sites

In order for the West London Waste Plan to provide an effective, plan led, strategy for sites for waste management use it must identify sufficient land to meet the identified need. Key to the success of the plan will be flexibility. Therefore there is a need to consult on an increased land take; over and above the minimum identified need, so that feedback from the consultation process can be accounted for in the final allocation of sites. In order to have a plan that is flexible there needs to be a range of site sizes to allow for development of new facilities of an appropriate size on a suitable site.

The potential sites for waste management use were divided into categories as follows:

4.6.1 *Existing waste management sites considered to have potential for development as waste management facilities*

Appendix 3 lists the existing waste management sites considered to have potential for re-development as waste management facilities and includes a site assessment sheet for each site listed and a map showing the location of each site listed across the West London Waste Plan area.

4.6.2 *New sites with opportunity for developing waste management facilities*

The new sites cover a much larger land area than the 56 hectares required for the West London Waste Plan. Appendix 4 lists the sites in this category and includes a

⁶ Planning Policy Statement 12: creating strong safe and prosperous communities through Local Spatial Planning, DCLG 2008

⁷ Planning for Sustainable Waste Management: Companion Guide to Planning Policy Statement 10, DCLG, 2006

site assessment sheet for each site and a map showing the location of each site across the West London Waste Plan area.

5 Appendices

- Appendix 1a** List of all existing sites assessed including scores
- Appendix 1b** List of all new (potential) sites assessed including scores
- Appendix 2** Updated waste management capacity and land area requirement calculations
- Appendix 3** Existing waste management sites considered to have potential for development as waste management facilities, site assessment sheets and map of sites across plan area.
- Appendix 4** New sites with opportunity for developing waste management facilities, site assessment sheets and map of sites across plan area
- Appendix 5** Site assessment sheets for remaining sites assessed