GP PLANNING LTD

PLANNING STATEMENT

CONSTRUCTION OF A REPLACEMENT WASTE TRANSFER STATION BUILDING

LAND OFF NEW YEAR'S GREEN LANE, HAREFIELD, UXBRIDGE, HILLINGDON, UB9 6LX

WEST LONDON COMPOSTING LTD

APRIL 2025

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Planning Statement		
WTS Highview Farm	West London Composting Ltd	E001-17

Revision	Comments	Author	Date
1	Initial drafting	CS	Nov 2024
2	Updates – Grey Belt / Environmental assessment work	CS	Jan 2025
3	Circular economy and energy statement	CS	Feb 2025
4	Non-validation Updates	CS	April 2025

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1 INTRODUCTION

1.1 Context

1.1.1 This Planning Statement accompanies a Planning Application prepared on behalf of West London Composting Ltd ("the Applicant") which is submitted to Hillingdon Borough Council, as Waste Planning Authority (WPA), seeking planning permission for a replacement Waste Transfer Station building including the demolition of a small shed building at the Applicant's existing waste management facility, Highview Farm, New Year's Green Lane, Harefield, UB9 6LX.

1.1.2 The existing waste transfer facility benefits from an Established Use Certificate and a Certificates of Lawful Use or Development (CLUED) granted in the early 1990's by the Secretary of Statement on behalf of the Department of Environment.

1.1.3 This submission is supported by the following documents and drawings:

- Planning Statement (this document)
- Appendix 1 – Established Use Certificate and a Certificates of Lawful Use or Development (CLUED)
- Appendix 2 – Transport Statement
- Appendix 3 – Noise Assessment
- Appendix 4 – Air Quality Screening
- Appendix 5 – Preliminary Ecological Appraisal
- Appendix 6 – Fire Prevention Plan

Drawings

- Site Location Plan - GPP-E-WLC-WTS-24-01 v3
- Existing Site Layout Plan - GPP-E-WLC-WTS-24-03 v3
- Proposed Site Layout Plan - GPP-E-WLC-WTS-24-03 v3
- Elevations and Floor Plan - GPP-E-WLC-WTS-24-04 v1

1.2 The Application Site and its Setting

1.2.1 The Application Site is approximately 0.64 hectares in size. The land subject of this Planning Application is shown edged red on drawing GPP-E-WLC-WTS-24-01 v3 entitled Site Location Plan. Access to the site is via the eastern end of New Year's Green Lane, which links to the A4180 to the east, which provides access to the Rickmansworth to the north and the A40/M40 and M25 motorway to the South and South

West. The southern site is bounded by open land to the south, east and West with Elm tree farm situated to the North East of the site.

1.2.2 The Application Site lies within land designated as Green Belt in the Local Plan.

1.2.3 There are a number of Sites of Special Scientific Interest (SSSI) in the vicinity of the Application site, the nearest being Ruislip Woods (Specifically Bayhust Woods Country Park), which lies approximately 450 metres to the north.

1.2.4 The existing, and adjacent, In-Vessell Composting (IVC) facility has the ability to process 75,000 tonnes per annum of green/organic waste material.

1.2.5 Adjacent to the existing Waste Transfer Station building are a number of redundant building and structures related to the IVC Facility as shown on the enclosed Existing Site Layout Plan - GPP-E-WLC-WTS-24-02 v3. The main structures are as follows:

- Weighbridge and Site Office
- Maintenance Building
- Reception hall
- Shredder
- 32 composting vessels
- 4 dirty water tanks
- 3 rainwater tanks
- 2 freshwater tanks
- Car parking area
- Concrete work areas and roadways
- Sealed drainage system

1.3 Planning History

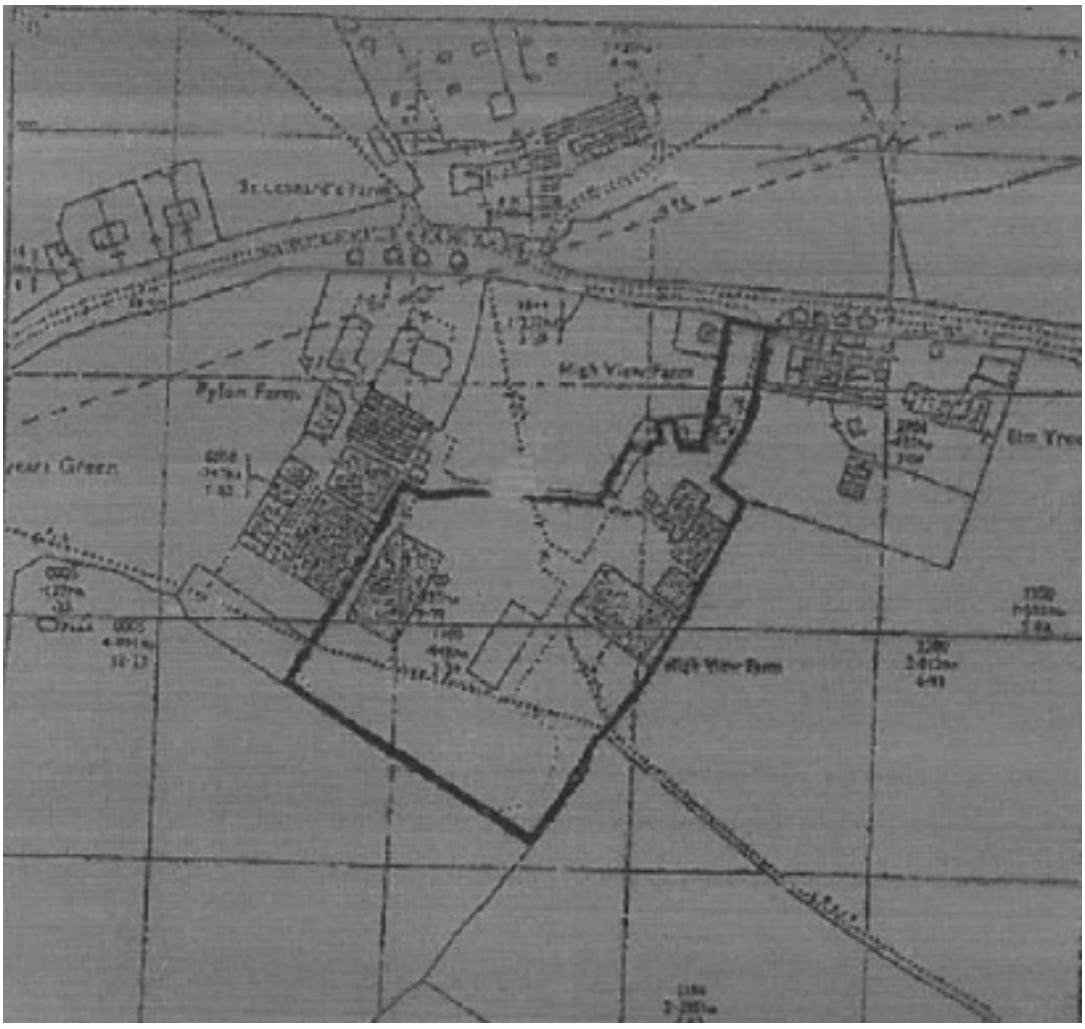
Established Waste Transfer Use

1.3.1 West London Composting Limited acquired the West London Composting site in May 2021. The Application Site benefits from an Established Use Certificate which was granted by the Secretary of Statement on behalf of the Department of Environment for the '*purposes of agricultural and transfer of waste*' on 21st October 1991 (reference App/D/90/R550/1).

1.3.2 A Certificates of Lawful Use or Development (CLUED) was also granted by the Secretary of Statement on behalf of the Department of Environment for the '*continued use of land for the transfer of waste, with a maximum of 24 deliveries by motor vehicles each week involving a cumulative total of a maximum of 320 cubic yards (244.7 cubic metres) of waste input each week and agriculture*.'

1.3.3 The land that is the subject of the Established Use Certificate and CLUED is shown on the drawing image extract below.

Figure 1 – Extent of Land subject to Established Use Certificate and CLUED



Wider Waste Management Operations

1.3.4 The Application Site forms part of the Applicant's wider waste management uses, which has a long planning history. Planning permission was granted on 17 September 2015 (LPA ref: 12579/APP/2012/2366) for the continuation and formalization of existing recycling operations at land to the North and South of New Year's Green Lane for an In-Vessel Composting Facility (IVC) operation to

handle a maximum throughput of 75,000 tonnes per annum of organic waste for a temporary period of five years. The application was supported by the previous Mayor. However, the temporary approval expired in September 2020 and a further one year extension was granted in May 2021.

1.3.5 Planning permission was granted on 31st August 2022 under planning reference 12579/APP/2021/2010 for the following:

> *"The permanent residency of the land to the North and South of Newyears Green Lane for the continued use of an organic composting facility operation to handle a maximum throughput of up to 75,000 tonnes per annum of organic waste, including retrospective retention of two above ground leachate storage tanks and the installation of three freshwater storage tanks."*

1.3.6 This consolidating planning permission covered land to north and south of New Year's Lane. This proposal was subject to a Stage 2 Referral to the GLA and also the Secretary of State in terms of being a departure from the Development Plan (Green Belt). Neither the GLA nor the Secretary of State called the application in.

1.3.7 Most recently, planning permission was granted by Hillingdon Borough Council on 21st June 2024 (under reference 39755/APP/2023/652) to regularise and extend the green waste composting operation north of New Years Green Lane as follows:

> *Regularisation of the existing green waste composting operations and proposed extension to the green waste open windrow compost maturation yard, construction of a storage container, site offices, welfare building, weighbridge/weighbridge offices, 2 no. leachate holding tanks, 2 no. 180kW generator sets, landscaping and areas of ecological enhancement, including a change of use of the land from pasture to a waste management use.*

1.3.8 Other relevant planning permission history (South of New Year's Green Lane) includes:

- A permanent planning permission ref: 39755/APP/2002/3026 dated 5th June 2003 was granted for the reception building and associated infrastructure. A further permanent planning permission ref: 39755/APP/2006/1446 was granted in June 2006 for the erection of 16 further vessels (June 2006). There were restrictions governing the level of use on this site to a maximum of 50,000 tonnes of waste per annum.

- A separate planning application was approved (reference 12579/APP/2016/4099) to discharge condition 3, 8, 9, 13, 15 and 16 of application reference - 12579/APP/2012/2366 (Details pursuant to the full discharge of condition 3, 8 and 9 and partial discharge of condition 13 (Landscape maintenance plan, a Construction Logistics Plan (CLP) and a delivery and Servicing Plan (DSP), bio filters, and Travel Plan), of planning permission ref: 12579/APP/2012/2366 dated 15-09-2015 (Increase in throughput from 50,000 tonnes per annum to 75,000 tonnes per annum of green waste material for a temporary period of five years).

2 PROPOSED DEVELOPMENT

2.1 Introduction & Background

2.1.1 The existing wider waste management site straddles both sides of New Year's Green Lane (north and south). On the southern side of the road there is the weighbridge, weighbridge offices, reception area, buildings and structures associated with the in-vessel composting operation and a building associated with the existing bulky waste transfer station. The northern side of the road has the composting maturation area (Open Windrows) and has recently obtained planning permission (June 2024) to regularise and extend the green waste composting operations.

2.1.2 The existing waste transfer station building within the context of the existing waste management facility is shown edged in red on the aerial image below.

2.2 The Application Site

2.2.1 The Planning Application boundary is shown edged red on drawing reference GPP-E-WLC-WTS-24-01 v3 entitled Site Location Plan. Other land within the Applicant's control is shown edged blue. The Application Site is approximately 0.64 hectares in size.

2.2.2 The proposed development will utilise the site's existing infrastructure including hard surfacing, drainage and weighbridge. Drawing reference GPP-E-WLC-WTS-24-02 v3 shows the existing layout of the site and the main features on the site.

2.3 Description of Development

2.3.1 The proposed description of development is as follows:

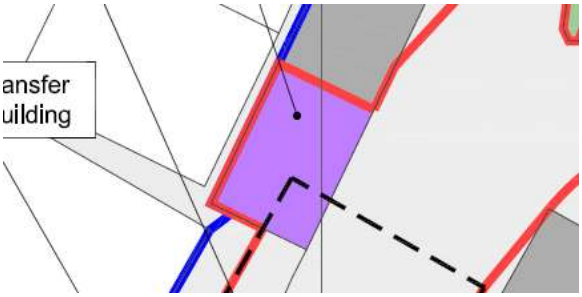
"Construction of a replacement Waste Transfer Station Building, and demolition of a lean-to shed building."

2.4 New Waste Transfer Station Building

2.4.1 The proposed waste transfer station and treatment building will have a steel portal frame construction and clad in box profiled cladding coloured dark green. The building will be used for the tipping of imported waste, bulking up and exportation from the site in bulk loads. The building will have 2x roller shutter doors on the northern elevation. The building will have dimensions of 60 metres long by 25 metres wide and 11 metres high to the ridge (9 metres high to the eaves).

2.4.2 Elevations and a floor plan of the proposed waste transfer station building are shown drawing GPP-E-WLC-WTS-24-04 v1. The proposed layout of the site is shown on drawing reference GPP-E-WLC-WTS-24-03 v3.

2.4.3 To make room for the proposed replacement waste transfer station and treatment building, a small covered structure/building will be taken down as shown on the drawing extract below.



2.5 Storage and Management of Waste (Loading and Unloading)

2.5.1 The handling and storage of waste material will be within the proposed waste transfer/treatment building (none outside). Waste materials will be stored in bays using moveable concrete Lego blocks or similar suitable structure such as "A -Blocks" as walls. The Applicant proposes to keep the internal layout of the storage bays flexible to respond to the requirements of the operations and types of waste streams.

2.5.2 Waste material will be tipped with the reception bay and moved to separate storage bays using a front loader/and or telehandler. There will be a baler located within the building for baling cardboard, paper, and packaging. Once there is a sufficient quantity of material bulked up, it will be exported from site in HGV (e.g., roll-on roll-off's or articulated loads).

2.5.3 Treatment on Site will only consist of manual sorting, and separation, storage, bulking up and transfer off Site for further recovery / disposal.

2.6 Waste Types & Quantities

2.6.1 The waste transfer station and treatment facility will have a throughput of approximately 50,000 tonnes per annum. The proposal will involve the bulking, treatment and transfer of commercial/industrial/municipal and construction and demolition waste. Commercial, industrial and municipal waste will include (but not limited to) cardboard, plastics, metal, paper and wood whilst the construction and demolition waste will include rubble, and hardcore and general municipal waste streams. The proposal also has the potential to bulk up food waste in sealed vessels and dry mixed recyclables.

2.6.2 It is proposed that the Site will accept a small amount of clinical waste consisting of nappies and sharps (approximately 10,000 tpa). Clinical waste will be stored within designated containers within the bay inside the WTS building. The WTS building will benefit from impermeable surfacing and a sealed drainage system throughout.

2.6.3 There will be no treatment of clinical waste undertaken on the Site, only storage and bulking up prior to transfer to a suitably permitted alternative facility for further recovery or disposal. Clinical waste will be stored for a maximum of 5 days.

2.6.4 Clinical waste will be stored and handled, as described in the site's Operating Techniques document which form part of the site's Environmental Permit and in accordance with the EA's Guidance "Healthcare waste: appropriate measures for permitted facilities.

2.7 Plant & Equipment

2.7.1 The waste transfer station and treatment facility will use x1 front loading shovel to load and unload waste materials for onward despatch. This will include a standard loading shovel, telehandler or material handling machinery as required. The plant/machinery will mainly operate inside the building.

2.8 Storage and Handling of Waste

2.8.1 Waste will be stored within concrete bays inside the building. There will be no handling or storage of waste material outside of the building except for asbestos, tyres and metal which will stored in enclosed skips in the yard. The storage of waste will be designed to comply with the Environment Agency's Fire Prevention Plan guidance at all times.

2.9 Access Arrangements

2.9.1 The Application Site includes two access points from New Years Green Lane to the north of the existing WTS building. To ensure there is no conflict of vehicle movements, a one-way in/out arrangement is in place at the site, with the eastern access providing access only for vehicles and the western access providing egress only. The existing access arrangements have been in-situ for some significant time and on this basis are well-established as being safe and suitable for the waste management use at the site.

2.9.2 The proposed development will utilise the site's existing infrastructure including hard surfacing, drainage and weighbridge. Drawing reference GPP-E-WLC-WTS-24-03 v3 shows the proposed layout of the site and the two main access and egress locations.

2.9.3 Newyears Green Lane meets Breakspear Road South and Harvill Road at simple priority junctions to the east and west of the site respectively. Access to the A40, which forms part of the strategic road network, can be achieved to the south or east of the site via B467 through Ickenham or A4180 through Ruislip respectively.

2.10 Traffic & Transportation

Existing/Permitted Traffic Movements

2.10.1 The existing waste transfer station at the site benefits from a Certificate of Lawful Use (dated 1991) which permits up to 24 deliveries of waste per week (48 two-way movements). The existing waste transfer

station generates some 8 two-way vehicle movements per day, and up to 2,304 two-way vehicle movements per annum. This is a nominal amount of vehicular traffic.

Proposed Traffic Movements

2.10.2 The proposed development will see the existing waste transfer station replaced with a new facility that can accommodate a throughput of 50,000 tonnes per annum. The replacement facility will continue to operate in conjunction with the existing waste management operation at the site. The breakdown of the different vehicles importing waste materials to the site is anticipated to be as follows:

50,000	Input Tonnage	Annual Tonnage	Average Payload
50%	REL (Dustcart)	25000	9
20%	RO-RO	10000	11
20%	Artic	10000	25
10%	Small Van	5000	1.5

2.10.3 The various waste streams will be exported from site in bulk articulated vehicles with an average payload of 25 tonnes.

2.10.4 The proposed throughput of waste material of up to 50,000 tonnes per annum would involve the following approximate vehicle movements. This broadly equates to between 1-2 additional vehicle trips per hour during operational hours, equating to one extra movement every 30-60 minutes.

Use	Typical Vehicle Movements (Two-way)			
	Daily	Weekly	Monthly	Annually
Existing Use	8	48	192	2,304
Proposed Use	26	155	618	7,420
Net Traffic Impact	***+18***	***+107***	***+426***	***+5,116***

2.11 Hours of Use

2.11.1 The proposed hours of use are as follows:

- 0700-1800 hours Monday to Friday
- 0700-1800 hours Saturdays, Sundays, Bank and Public Holidays

2.12 Environmental Permit

2.12.1 The Applicant is in the process of applying for an Environmental Permit with the Environment Agency. A number of detailed management and monitoring management plans will be required to be agreed with the EA including:

- Environmental (Amenity) Risk Assessment (ERA);
- Fire Prevention Plan (FPP);
- Dust and Emissions Management Plan (DMP);
- Noise Management Plan (NMP), and
- Odour Management Plan (OMP).

2.13 Security

2.13.1 The site entrance has a lockable gate's access. The applicant uses a CCTV system to deter and prevent crime and also has an overnight security guard on patrol. The Site Manager will be responsible for ensuring that the site is safe and secure when not operating.

3 PLANNING POLICY CONTEXT

3.1 Introduction

3.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of a Planning Application must be made in accordance with the Development Plan unless material considerations indicate otherwise.

3.1.2 In this instance, the Development Plan for the London Borough of Hillingdon consists of the following documents:

- The Local Plan: Part 1 - Strategic Policies (2012)
- The Local Plan: Part 2 - Development Management Policies (2020)
- The Local Plan: Part 2 - Site Allocations and Designations (2020)
- The West London Waste Plan (2015)
- The London Plan (2021)

3.2 The Development Plan

Hillingdon Borough Local Plan – Part 1 (2012)

3.2.1 The Local Plan Part 1 sets out the overall level and broad locations of growth up to 2026. It comprises a spatial vision and strategy, strategic objectives, core policies and a monitoring and implementation framework with clear objectives for achieving delivery. These policies are supported by more detailed policies and allocations set out in the Local Plan Part 2.

- EM2 - Green Belt, Metropolitan Open Land and Green Chains
- EM6 - Flood Risk Management
- EM7 - Biodiversity and Geological Conservation
- EM8 - Land, Water, Air and Noise

Hillingdon Borough Local Plan – Part 2 (2020)

3.2.2 The Local Plan Part 2 comprises Development Management Policies, Site Allocations and Designations and the Policies Map. Once adopted, it will deliver the detail of the strategic policies set out in the Local Plan Part 1.

- DMEI 4 Development on the Green Belt or Metropolitan Open Land

- DMEI 7 Biodiversity Protection and Enhancement
- DMHB 14 Trees and Landscaping
- DMT 1 Managing Transport Impacts
- DMT 2 Highways Impacts
- DMEI 10 Water Management, Efficiency and Quality
- DMEI 11 Protection of Ground Water Resources
- DMEI 12 Development of Land Affected by Contamination
- DMEI 13 Importation of Material
- DMEI 14 Air Quality
- DMEI 9 Management of Flood Risk

West London Waste Local Plan 2015

3.2.3 The 6 West London Waste Authority boroughs (Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames) and the Old Oak and Park Royal Development Corporation have formally adopted the West London Waste Plan as part of the Local Plan for their areas.

3.2.4 The Plan sets out a strategy and policies for the sustainable management of all waste produced within the Plan area for the period up to 2031.

3.2.5 The following main policies of the West London Waste Local Plan are relevant to proposal:

- Policy WLWP 2 – Safeguarding and Protection of Existing and Allocated Waste Sites

London Plan 2021

3.2.6 The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth.

3.2.7 The Plan is part of the statutory development plan for London, meaning that the policies in the Plan should inform decisions on planning applications across the capital. Borough's Local Plans must be in 'general conformity' with the London Plan, ensuring that the planning system for London operates in a joined-up way and reflects the overall strategy for how London can develop sustainably, which the London Plan sets out.

3.2.8 The following main policies of the London Plan are relevant to proposal:

- LPP D12 Fire safety

- LPP D13 Agent of change
- LPP HC1 Heritage conservation and growth
- LPP D14 Noise
- LPP DF1 Delivery of the Plan and Planning Obligations
- LPP G2 London's Green Belt
- LPP G6 Biodiversity and access to nature
- LPP G7 Trees and woodlands
- LPP G9 Geodiversity
- LPP GG2 Making the best use of land
- LPP SI1 Improving air quality
- LPP SI12 Flood risk management
- LPP SI13 Sustainable drainage
- LPP SI7 Reducing waste and supporting the circular economy
- LPP SI8 Waste capacity and net waste self-sufficiency
- LPP SI9 Safeguarded waste sites
- LPP SI2 Minimizing greenhouse gas emissions
- LPP T4 Assessing and mitigating transport impacts

3.3 Other Relevant Documents

3.3.1 The National Planning Practice Guide (NPPG) confirms that the National Planning Policy Framework (NPPF) represents up-to-date government planning policy and must be taken into account where it is relevant to a Planning Application.

3.3.2 The following documents are therefore considered to represent a material consideration in the determination of this planning application:

- National Planning Policy Framework (Dec 2024);
- National Planning Practice Guidance;
- National Planning Policy for Waste (2014);

4 MAIN PLANNING CONSIDERATIONS

4.1 Introduction

4.1.1 From an assessment of the Development Plan and other relevant documents, the main issues in the assessment of the proposed development are as follows:

- Principle of Development
- Grey Belt
- Green Belt
- Environmental and Amenity Considerations.

4.1.2 The following section considers the main planning issues in turn.

4.2 Principle of Development

4.2.1 The adopted London Plan promotes resource conservation, waste reduction and a circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible. It sets out to meet or exceed the following targets:

- Zero biodegradable or recyclable waste to landfill by 2026
- Municipal waste recycling target of 65% by 2030
- Construction and demolition reuse/ recycling/ recovery target of 95%
- Excavation beneficial use target of 95%

4.2.2 Policy WLWP 7 (National Planning Policy Framework: Presumption in Favour of Sustainable Development) states that:

> *"When considering development proposals, Boroughs and OPDC will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. They will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in this waste plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise."*

4.2.3 Policy WLWP 2 (Safeguarding and Protection of Existing and Allocated Waste Sites) of the West London Waste Local Plan (WLWLP) and Policy SI9 (Safeguarded Waste Sites) of the West London Plan 2015 seek to ensure that land accommodating existing waste management uses in West London will be protected for continued use for waste management.

4.2.4 Policy WLWP 3 (Location of Waste Development Waste) of the WLWLP states that:

"development proposals on existing waste management sites and the sites listed in Table 5-2 will generally be supported, provided that the proposals comply with the development plan for the area"

4.2.5 In this case, the Applicant's waste management site is identified as an existing waste management facility set out in the table at Appendix 2 to the WLWLP as shown on the extract below:

L J Grundon & Sons Ltd	High View Farm, Harefield	CDE Waste Processing/ Transfer	Hillingdon	

4.2.6 In addition to being identified as an existing waste management facility in the Waste Local Plan, the planning history of the site confirms that the Applicant has planning permission for bulking and transferring waste streams from the Application Site (reference the Established Use Certificate and the Certificates of Lawful Use or Development referred to in paragraph 1.3.1 to 1.3.2).

4.2.7 Policy SI 8 (Waste capacity and net waste self-sufficiency) of the London Plan states that in order to manage London's waste sustainably:

1) the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026
2) existing waste management sites should be safeguarded (see Policy SI 9 Safeguarded waste sites)
3) the waste management capacity of existing sites should be optimised
4) new waste management sites should be provided where required
5) environmental, social and economic benefits from waste and secondary materials management should be created.

4.2.8 There is a clear aspiration in Policy SI 8 for London to manage its own waste streams and that waste management capacity at existing sites should be maximised. The Applicant's proposal will make an important contribution to increasing waste recycling in the West London area providing a sustainable (environmental, social and economic benefits) solution to moving waste up the hierarchy.

4.2.9 Part D of Policy SI 8 (Waste capacity and net waste self-sufficiency) of the London Plan states that:

4.2.10 Developments proposals for new waste sites or to increase the capacity of existing sites should be evaluated against the following criteria:

- *1) the nature of the activity, its scale and location*
- *2) effective implementation of the waste hierarchy and its contribution to London's circular economy*
- *3) achieving a positive carbon outcome (i.e. re-using and recycling high carbon content materials) resulting in significant greenhouse gas savings – all facilities generating energy from waste will need to meet, or demonstrate that steps are in place to meet, a minimum performance of 400g of CO2 equivalent per kilowatt hour of electricity produced*
- *4) the impact on amenity in surrounding areas (including but not limited to noise, odours, air quality and visual impact) – where a site is likely to produce significant air quality, dust or noise impacts, it should be fully enclosed*
- *5) the transport and environmental impacts of all vehicle movements related to the proposal – the use of renewable fuels from waste sources and the use of rail and waterway networks to transport waste should be supported.*

4.2.11 In terms of criterion 1, the proposal is considered to be of an appropriate scale and activity in a location which compliant with the locational criterion of the WLWLP.

4.2.12 The proposal is fully compliant with criterion 2 in that it involves recycling and bulking up commercial and industrial waste streams moving waste up the hierarchy and contributing to London circular economy aspirations.

4.2.13 The proposal is fully compliant with criterion 3 in that it involves recycling and bulking up commercial and industrial waste streams, some of which have a high carbon content (such as wood, paper card), that can be recovered and either recycled or used as RDF or SFR as feedstock for energy from waste plants.

4.2.14 Section 4 of this Planning Statement demonstrates that the proposal will not have any adverse local amenity or transport related impacts on the surrounding area demonstrating fully compliance with criteria 4 and 5 of part D.

4.2.15 In light of the above, the principle of a replacement Waste Transfer Station building on the Application Site is considered compliant with Policy WLWP 3 (Location of Waste Development Waste) of the WLWLP and Policy SI 8 of the London Plan.

4.3 Grey Belt

Planning Policy Context

4.3.1 The recently updated NPPF (December 2024) includes a new planning policy test (Grey Belt) for development proposals that are located within land designated as Green Belt. It states at paragraph 155:

> *"The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where:*
>
> *a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
>
> *b. There is a demonstrable unmet need for the type of development proposed;*
>
> *c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
>
> *d. Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.*

4.3.2 The Glossary to the Framework defines Grey Belt as, "…*Grey Belt is defined as land in the GB comprising previously developed land (PDL) and/or3 any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in Framework paragraph 143. Grey Belt excludes land where the application of the policies relating to the areas or assets in Footnote 7 (other than GB) would provide a strong reason for refusing or restricting development."*

Paragraph 155, Part A – Grey Belt & Fundamental Purposes

4.3.3 The Applicant's proposal is considered under paragraph 155 as follows. Under part **a**, the proposed development would use grey belt land which by its definition would not fundamentally undermine the purposes of the wider Green Belt. Paragraph 143 of the NPPF states that Green Belt serves five purposes:

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

4.3.4 The proposal will not conflict with part a) or b) because the proposed development would be of limited intervisibility with surrounding areas and will not contribute to the unrestricted sprawl of large built-up areas or make any contribution to neighbouring towns merging into one another. In terms of part c) the proposal will be constructed on land that is in an existing waste management use and will not therefore encroach into the countryside. Given the location of the proposal on land within in an industrial/waste management context, and the physical separation from the setting or special character of historic towns, there is also no conflict with part d). Finally, the proposed development has no relevance to urban regeneration and therefore there is no conflict with part e) of paragraph 143.

4.3.5 It is therefore concluded that the proposal will not conflict with the five main purposes of which Green Belt serves and any harm is limited. The proposal is therefore compliant with Part a) of paragraph 155 of the NPPF.

Paragraph 155, Part B – Demonstrable Need

Introduction

4.3.6 The following section sets out an assessment of whether there is a 'demonstrable need' for the proposed waste management facility having regard to part b) of paragraph 155.

4.3.7 The London Plan (2021) identifies that at present 32% of London's waste that is biodegradable is sent to landfill. The Mayor is committed to sending no biodegradable waste to landfill by 2026. The Applicant's existing composting site has been operating for a number of years and is the primary facility for managing organic waste across West London. It is an allocated site within the West London Waste Local Plan and therefore plays a crucial role in managing green waste in the West London area and moving waste up the Waste Hierarchy.

4.3.8 Policy SI 8 (A) of the London Plan (2021) deals with 'Waste capacity and net waste self-sufficiency'. It states that in order to manage London's waste sustainably:

> ***1) the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026***
>
> *2) existing waste management sites should be safeguarded (see Policy SI 9 Safeguarded waste sites)*
>
> ***3) the waste management capacity of existing sites should be optimised***
>
> *4) new waste management sites should be provided where required*

5) environmental, social and economic benefits from waste and secondary materials management should be created.

4.3.9 The proposed facility will have a throughput of 50,000 tonnes, comprising mainly commercial and industrial waste. The following assessment covers "quantitative" need for the proposed facility, which is based on the size of any future predicted capacity gap in the West London Waste Authority sub-region for Municipal solid waste (MSW) and Commercial & Industrial (C&I) waste.

Quantitative Need Assessment Limitations

4.3.10 The following factors limit the assessment:

- The West London Waste Plan (WLWP) is now out -of-date;
- The London Plan 2021 updates the waste arisings apportionment in the WLWP;
- The London Plan does not differentiate between household C&I waste, and
- A significant amount of residual waste is managed outside of the sub-region

4.3.11 In addition, for the purposes of this assessment only facilities with planning permission have been included as contributing towards the area's waste capacity. There are some waste facilities within the WLWP area listed on the Mayor of London Waste Map which have not been included because they do not appear to have a valid *waste* planning permission. As such they may be operating unlawfully.

4.3.12 Proposals for new development to deal with waste commodities usually need planning permission, although in some cases an existing area of land or a building may already allow the treatment of waste, which is regarded as equivalent to any other B2 industrial development. Simple waste storage and transfer may not need permission.

The West London Waste Plan (WLWP)

4.3.13 The WLWP was prepared jointly by the six West London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames. It was adopted in July 2015.

4.3.14 The WLWP reflects the targets and waste apportionments specified in the 2011 version of the London Plan. The WLWP states at paragraph 1.2.2 "*The London Plan (2011) aims to ensure that as much of London's waste is managed within London as practicable working towards managing the equivalent of 100% of London's waste within London by 2031".* Table 4.2 of the WLWP shows the capacity requirements and this is reproduced below as Table 1.

Table 1: West London Capacity Requirements for Target Years based on the London Plan (2011)					
	2011	2016	2021	2026	2031
Apportionment (tonnes per annum)	1,399,000	1,595,000	1,798,000	2,019,000	2,250,000
Total existing waste management capacity (tonnes per annum)	1,636,000	1,636,000	1,636,000	1,636,000	1,636,000
Additional capacity required to meet the apportionment (tonnes perannum)	0	0	162,000	383,000	614,000
Land required to address the capacity gap (hectares)	0	0	2.5	5.9	9.4

4.3.15 Data entries for 2011, 2016 and 2021 are no longer relevant. There is a capacity gap for 2026 and 2031.

4.3.16 The WLWP identifies eight sites which are aimed at providing adequate waste management provision for the lifetime of the Plan. These are reproduced in Table 2 below, which is Table 5.1 of the WLWP.

Table 2: WLWP Table 5-1: Existing waste sites considered to have potential for redevelopment				
Site Number	Description	Site Type	Site Area (ha)	Borough
352	Twyford Waste Transfer Station	Transfer Station	1.24	Brent (OPDC)**
1261	Veolia Transfer Station, Marsh Road	Transfer Station	2.71	Brent
309*	Greenford Reuse & Recycling Site	Transfer Station	1.78	Ealing
310*	Greenford Depot, Greenford Road	Depot Facility		
328#	Quattro, Victoria Road, Park Royal	Transfer Station	0.7	Ealing (OPDC)**
222	Council Depot, Forward Drive	Depot Facility	2.31	Harrow
331	Rigby Lane Waste Transfer Station	Transfer Station	0.91	Hillingdon
342	Twickenham Depot	Depot Facility	2.67	Richmond
Total			**12.32**	

4.3.17 The sites in Table 2 are those existing sites that are considered to have particular potential for redevelopment for future waste capacity expansion. An additional site is also included at Table 5.2, in the WLWP, this being Western International Market in Southall.

4.3.18 In terms of capacity Policy WLWP 1 - Provision of New Waste Management Capacity, states:

"Apportioned Waste – Municipal Solid Waste & Commercial and Industrial Waste:

Over the period to 2031, there is a need for about 614,000 tonnes of additional annual capacity to meet the apportionment set in the London Plan (2011). This is to be delivered on the allocated sites identified in Policy WLWP 2 as follows:

- *162,000 tonnes in the period up to 2021*
- *A further 221,000 tonnes (total 383,000 tonnes) in the period 2021 to 2026*
- *A further 231,000 tonnes (total 614,000 tonnes) in the period 2026 to 2031"*

New Sites

4.3.19 A search of the individual authorities' public access web sites and the Mayor of London's online planning permissions map has revealed 2 "new" permissions which provide additional Municipal and C&I waste capacity. A "minded to grant permission" in Ealing is also included. These are shown in Table 3.

Table 3: Additional waste capacity

Site	Reference	Type	Date permitted	Capacity
Southall Lane, Hayes Road, Hounslow (Western Int Market)	1032/I/P1	Household waste recycling	31 May 2016	30,000
First Mile Ltd 32-38A Minerva Road, Park Royal Ealing	166095OPDFUL	Material Sorting Facility	24 February 2017	75,000
Land Off Collett Way, Glade Lane, Southall, Ealing	24/0602/FUL	MRF	7 November 2024	75,000*

*see below for explanation.

4.3.20 The site at Collette way will have a capacity of 150,000 tonnes half of which would be C&I waste. However, this site is a replacement for a facility at Twyford Abey Road, Park Royal which is a waste management facility safeguarded under the OPDC and WLWA local plans. It also an allocated site in the WLWP. The WLWP states that *input tonnage counted as 22,714 tpa in existing capacity*. Therefore, the replacement facility would provide an additional net tonnage of 52,286 (75,000 minus 22,714).

4.3.21 The technical background paper to the WLWP "Assessment of Existing Capacity & Apportionment" by BPP Consulting, published in February 2014, sets out the existing waste capacity at that time and so it is

assumed that the data would have been correct at the end of 2013. For the purposes of this assessment, therefore, the baseline existing capacity is taken as end of 2013.

4.3.22 In light of the above an additional capacity of 157,286 tonnes throughput needs to be added to the 2013 baseline.

The London Plan 2021

4.3.23 The WLWP was based on apportionment data from the 2011 London Plan. However, this has now been superseded with the publication of the London Plan (LP) 2021 in March 2021. Table 9.2 of the LP sets out the revised apportionment figures for each London Borough. Consequently Table 4.2 of the WLWP (as shown in Table 1 above) needs to be updated with new apportionment figures for the six West London Boroughs. Table 4 below sets out the revised arisings and apportionment figures.

Table 4: Apportionment and arisings

Borough	Appmt %	Arisings 2021	Arisings 2026 (estimate)	Arisings 2031 (estimate)	Arisings 2041	Appmt 2021	Appmt 2026 (estimate)	Appmt 2031 (estimate)	Appmt 2041
Brent	5	259	263	267	274	411	417	424	436
Ealing	6.6	291	295	299	306	542	551	559	576
Harrow	1.9	188	192	197	205	156	159	161	166
Hillingdon	5.1	347	352	356	365	419	426	432	445
Hounslow	5	260	264	268	275	411	417	424	436
Richmond	1.8	179	182	185	190	148	150	152	157
total	**25.4**	**1524**	**1547**	**1570**	**1615**	**2087**	**2119**	**2152**	**2216**
London		**8217**	**8344**	**8472**	**8726**	**8217**	**8344**	**8472**	**8726**

4.3.24 Only apportionment and arising figures for 2021 and 2041 are included in the LP. Apportionment and arisings for 2026 and 2031 have therefore been estimated as follows:

- London 2031 arisings = (8217 + 8726) ÷ 2 = 8472
- London 2026 arisings = (8217 + 8472) ÷ 2 = 8344

4.3.25 The same exercise has been undertaken for the apportionment estimates.

4.3.26 The apportionment figures in Table 4 in some cases are different from those shown in Table 9.2 of the 2021 LP. This may be due to some rounding up issues in the LP table, but the figures in Table 4 have been checked and are correct.

4.3.27 Table 5 shows the revised capacity figures after taking into account the updated apportionment and the additional *permitted* capacity of 157,286. This shows that there would be a capacity gap for each of the 3 "target" years. Even with the addition of the proposed 50,000 tonne facility there would still be a significant capacity gap for each year.

Table 5: Capacity gap estimates			
	2026	**2031**	**2041**
Apportionment	2108000	2152000	2216000
Existing Capacity	1793286	1793286	1793286
Additional Capacity required	**314714**	**358714**	**422714**
with new WTS	**264714**	**308714**	**372714**

Conclusions

4.3.28 The above assessment demonstrates that there is a quantitative need for additional waste management facilities in 2026, 2031 and 2041. This does not take into account any permissions for new/extended sites which may be granted between now and the subsequent target dates. However, given that only one of the "allocated" sites has had any additional capacity permitted since the WLWP was adopted in 2015, there is no certainty that any further capacity would be forthcoming before the next target date of 2026.

4.3.29 Policy S18 of the London Plan states that "*the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026".* It is not known what the situation is for London as a whole but based on this need assessment there is clearly a significant capacity gap for the West London Waste area. The proposed development will help to reduce this capacity gap and so would be fully supported by Policy SI 8.

4.3.30 It is therefore concluded that there is a demonstrable unmet need for the waste management development in contributing to the movement of waste up the hierarchy, optimising the waste management capacity of existing sites and contributing to the London Plan's (2011) aims to ensure that as much of London's waste is managed within London as practicable working towards managing the equivalent of 100% of London's waste within London by 2031. The proposed development therefore demonstrates compliance with Part b) of paragraph 155 of the NPPF.

Paragraph 155, Part C – Sustainable Location

4.3.31 The application site is forms part of land that is safeguarded for waste management uses and has a lawful use certificate for waste recycling uses. For the purposes of part **c**) of paragraph 155 of the NPPF, the proposed replacement waste transfer station building is considered to be located in sustainable location with a safe means of access to the strategic highway (the paragraphs referenced [110 & 115] relate specifically to transport). The wider sustainability credentials of the proposals are expressed in the submitted Planning Statement. The proposed development therefore demonstrates compliance with Part c) of paragraph 155 of the NPPF.

Paragraph 155, Part D – Golden Rules

4.3.32 For the final part of paragraph 155 (part **d**), *where applicable*, the proposed development meets the 'Golden Rules' requirements in paragraphs 156-157. Paragraphs 156 and 157 relate to residential development and are not considered applicable in this case. The proposed development therefore demonstrates compliance with Part d) of paragraph 155 of the NPPF.

Conclusions – Grey Belt Test

4.3.33 The Courts have found that where a development is found not to be inappropriate development it should not be regarded as harmful either to the openness of the Green Belt or to the purposes of including land within it.

4.3.34 Having regard to the above, it is considered that the proposed development is previously developed land and meets the 'Grey Belt' policy tests of paragraph 155 of the NPPF. The proposed development is **not** therefore considered to be inappropriate development in the Green Belt, and it is not necessary to demonstrate very special circumstances in this case. However, if the WPA disagrees with this analysis, the following section assesses the proposed development on the basis it is defined as inappropriate development for the purposes of the NPPF.

4.4 Green Belt

Planning Policy Context

4.4.1 The Application Site lies within the Metropolitan Green Belt. At a national level, paragraph 150 of the NPPF states certain other forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. Part d) states that:

"d) the re-use of buildings provided that the buildings are of permanent and substantial construction;"

4.4.2 Policy EM2: Green Belt, Metropolitan Open Land and Green Chains of the Local Plan (Part 2 Strategic Policies) states (inter alia):

"Any proposals for development in Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the very special circumstances test."

4.4.3 Part B of Policy DMEI 4 (Development in the Green Belt or on Metropolitan Open Land) of the Local Plan Part 2 (Development Management Policies) states:

"B) Extensions and redevelopment on sites in the Green Belt and Metropolitan Open Land will be permitted only where the proposal would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it, than the existing development, having regard to:

i) the height and bulk of the existing building on the site;

ii) the proportion of the site that is already developed;

iii) the footprint, distribution and character of the existing buildings on the site;

iv) the relationship of the proposal with any development on the site that is to be retained; and

v) the visual amenity and character of the Green Belt and Metropolitan Open Land."

Assessment of Openness

4.4.4 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The PPG confirms that there is both a spatial and visual dimension to openness, but requires a judgement based on the circumstances, which may include openness with its spatial and visual aspects, and the degree of activity likely to be generated. In this case, the proposed replacement Waste Transfer Station building will be located within an industrial estate context situated between a number of existing buildings and structures as can be seen from the aerial image overleaf.

4.4.5 The proposed replacement Waste Transfer Station building will be larger than the existing building but only by an increase on floorspace of approximately 43%. The impact of the proposal in terms of the spatial and visual dimension to openness is in the context of the area is therefore considered to be minimal. The proposal will therefore exert limited harm to openness.

The Exception Test

4.4.6 Paragraph 154 of the Framework states that

> *"A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:*
> *d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;"*

4.4.7 The proposal is compliant with the first part of section d) by the replacement building being in the same land use. The main question in regard to this case is whether the building is materially larger that the one it replaces.

4.4.8 In the judgement of R (Heath and Hampstead Society) v Camden LBC [2008] EWCA Civ 193 it was held that the words 'replacement' and 'not materially larger' must be read together and in the same context, with 'size' being the primary test. The general intention is that the new building should be similar in scale to that which it replaces. In terms of 'larger' Carnwath LJ commented: "*A small increase may be significant or insignificant in planning terms, depending on such matters as design, massing and disposition on the site. The qualification provides the necessary flexibility to allow planning judgement and common sense to play a part, and is not a precise formula. However, that flexibility does not justify stretching the word "materially" to produce a different, much broader test*." The judge also mentioned that the perception of the size of the new building could be relevant to the materiality of a measured increase in size.

4.4.9 In this case, the floor space of the existing building is approximately 644 square metres whereas the proposed replacement building will have a floor space of 1500 square metres. The proposed replacement Waste Transfer Station building is likely to be considered 'materially larger' than the one it replaces and therefore is unlikely to meet the second part of the exception test in part d). On the basis that it is the Waste Planning Authority's view that the proposal does not meet the policy tests of paragraph 155 (Grey Belt), the proposal would represent inappropriate development for the purposes of the Green Belt exception test. The Applicant therefore sets out a very special circumstances case below.

Very Special Circumstances – Inappropriate Development

4.4.10 Paragraph 152 of the NPPF confirms that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

4.4.11 Paragraph 153 of the NPPF states:

> *"…when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very Special Circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations".*

4.4.12 Paragraph 156 goes on to state that:

> *When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the*

wider environmental benefits associated with increased production of energy from renewable sources.

4.4.13 Again, on the basis that the Waste Planning Authority disagrees that the proposal does not meet the policy tests of paragraph 155 (Grey Belt), there would be a requirement for 'very special circumstances' to be demonstrated where inappropriate development, 'by definition', is harmful to the Green Belt. The Applicant's very special circumstances case is based on the following main matters:

- The existing permitted use of the land;
- Waste management capacity and need;
- Sustainable Waste Management, Waste Hierarchy and Climate Change, and
- Economic and Employment Benefits.

4.4.14 The above very special circumstances are discussed in turn below.

Existing Permitted Use of Land

4.4.15 There will be no change in the use of land as result of the proposed development. The Applicant's waste management site is not only identified as an existing waste management facility in the Waste Local Plan it also benefits from an Established Use Certificate and the Certificates of Lawful Use or Development for the bulking and transferring of waste streams relevant to this proposal.

4.4.16 There is an existing Waste Transfer Station building on site, which will be demolished to make way for the proposed purpose-built Waste Transfer Station building. The lawful use of the land for waste transfer and bulking of commercial waste streams is a special circumstance to which significant weight should be attached in the planning balance.

Waste Management Capacity and Need

4.4.17 Paragraphs 4.3.5 to 4.3.29 (inclusive) above demonstrate that there is a quantitative need for additional waste management facilities in 2026, 2031 and 2041. This does not take into account any permissions for new/extended sites which may be granted between now and the subsequent target dates. However, given that only one of the "allocated" sites has had any additional capacity permitted since the WLWP was adopted in 2015, there is no certainty that any further capacity would be forthcoming before the next target date of 2026.

4.4.18 Policy S18 of the London Plan states that "*the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026".* It is not known what the situation is for

London as a whole but based on this need assessment there is clearly a significant capacity gap for the West London Waste area. The Proposed Devel

4.4.19 The demonstrated demonstrable need for the proposed waste management facility is a very special circumstance to which significant weight should be attached in the planning balance.

Sustainable Waste Management, Waste Hierarchy and Climate Change

4.4.20 Strategic Objective 2 of the WLP seeks to encourage development which supports sustainable waste management at least in line with national targets for recycling, recovery and composting. At paragraph 3.2.1.1, the WLP confirms that:

> *National policy states that in preparing local plans, WPAs should drive waste management up the waste hierarchy. This means encouraging prevention of waste, and preparing for the re-use, recycling and recovery of waste (including recovery of inert waste to land).*

4.4.21 The proposal will make an important contribution to increasing recycling rates, reducing emissions and helping to meet the Government's climate change. In addition, the proposal will also contribute to towards the Mayor of London's aspirations of creating a circular economy, which is defined as 'Reducing waste and supporting the Circular Economy' as one where materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste. The end goal is to retain the value of materials and resources indefinitely, with no residual waste at all. The proposed Waste Transfer Station building, and operation will assist the Borough Council and the wider GLA of moving waste up the hierarchy and help tackle climate change.

4.4.22 The proposal's contribution to recycling targets, carbon savings and moving waste up the waste hierarchy are environmental benefits which are considered to constitute a very special circumstance which should be afforded significant weight against any harm to the Green Belt.

Economic and Employment Benefits

4.4.23 Policy SI 8 (A 5) of the London Plan (2021) deals with 'Waste capacity and net waste self-sufficiency'. It states that in order to manage London's waste sustainably the:

> *5) environmental, social and economic benefits from waste and secondary materials management should be created.*

4.4.24 The Government is committed to securing economic growth in order to create jobs and prosperity and meeting the twin challenges of global competition and of a low carbon future.

4.4.25 Paragraph 81 of the NPPF states that:

> *Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.*

4.4.26 Paragraph 84 of the NPPF also provides that

> *Planning policies and decisions should enable:*
> *a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;*
> *b) the development and diversification of agricultural and other land-based rural businesses;*

4.4.27 With a successful outcome of this planning application, the proposal will sustain 10 existing jobs, create 3 full-time positions, and assist to maintaining a prosperous rural based business. Maintaining and increasing employment in the Applicant's business and sustaining an existing rural based business is considered to represent a very special circumstance which should be afforded moderate weight.

Conclusions – Green Belt Planning Policy

4.4.28 The proposal has been assessed in accordance with Policy 9 of the WLP and the requirements of the NPPF. It is considered that the proposal will not conflict with the fundamental aims of Green Belt policy which is to prevent urban sprawl and keep land permanently open. In the light of the above, it is considered that the proposal will have limited harm to the fundamental aims of the Green Belt.

4.4.29 The main existing building and structures on site benefit from permanent planning permission and therefore only the maturation yard to the above is relevant to the assessment of harm to the Green Belt. This part of the site blends onto the landscape and exerts minimal visual impact. The lack of built structures in the northern part of the minimises any harm to the openness of the Green Belt.

4.4.30 In this case, it is considered that any harm by reason of inappropriateness is clearly outweighed by other considerations, which amount to a very special circumstances case, which includes:

- The existing permitted use of the land;
- Waste management capacity and need;
- Sustainable Waste Management, Waste Hierarchy and Climate Change, and
- Economic and Employment Benefits.

4.4.31 The Applicant's proposal therefore complies with Green Belt policy set out in the NPPF and the London Plan.

5 ENVIRONMENTAL AND LOCAL AMENITY CONSIDERATIONS

5.1 Introduction

5.1.1 Having regard to the Development Plan and other relevant planning policy documents, the following environmental and local amenity topics are covered in appropriate detail as follows:

- Traffic & Transportation
- Noise
- Air Quality
- Ecology & Biodiversity Net Gain
- Landscape & Visual Impact
- Flood Risk and the Water Environment
- Fire Prevention Plan

5.1.2 The above topics are considered in turn below.

5.2 Traffic & Transportation

5.2.1 Policy DMT 1 (Managing Transport Impacts) of Hillingdon Borough Local Plan (Part 2) requires development proposals to meet the transport needs of the development and address its transport impacts in a sustainable manner. In order for developments to be acceptable they are required to comply with a number criteria including a safe means of access and no significant adverse transport or associated air quality and noise impacts on the local and wider environment, particularly on the strategic road network.

5.2.2 Policy DMT 2 (Highways Impacts) of Local Plan (Part 2) Policy T4 (Assessing and mitigating transport impacts) of the London Plan have similar policy requirements.

5.2.3 Paragraph 116 of the NPPF states that:

> *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios."*

5.2.4 A Transport Statement report, prepared by i-Transport Consultancy Ltd, is enclosed at Appendix 2 to this Planning Statement. The purpose of the report is to consider the relevant key transport tests set out in the NPPF paragraph 115, namely:

- Will safe and suitable access be provided?
- Will the traffic impacts be acceptable?

5.2.5 Paragraph 116 of the NPPF also states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

5.2.6 Section 2 of the Transport Statement confirms that the existing arrangements provide safe and suitable access to the existing waste management operation at the site and will continue to provide safe and suitable access for the proposed replacement waste transfer station. Consistent with the existing waste management operation at the site, all vehicles will enter the site via the eastern access and egress via the western access. The existing access arrangements have been in-situ for some significant time and have a nearly unblemished highway safety record over the last 20 years.

5.2.7 When compared to the extant waste transfer station operation, the proposed replacement waste transfer station building is forecast to result in an increase of some 18 two-way vehicle movements per day. This broadly equates to between 1-2 additional vehicle trips per hour during operational hours. This is a negligible volume of additional traffic, equating to one extra movement every 30-60 minutes, that will have no noticeable, let alone 'severe' impact on the operation of the local highway network, or indeed the site access arrangements.

5.2.8 Section 4 of the Transport Statement sets out a Framework Construction Logistics Plan (CLP). The purpose of the CLP is to minimise the impacts of construction traffic on the environment and the surrounding highway network, including any impacts to existing users in terms of delay and amenity.

5.2.9 Section 5 of the Transport Statement sets out a Framework Delivery and Servicing Plan (DSP). The purpose of the DSP is to ensure that the operational efficiency of the development is increased by reducing delivery and servicing impacts to premises, specifically in relation to CO_2 emissions, congestion and collisions. DSP's aim to reduce delivery trips, particularly during network peak periods. If further details of the CLP and DSP are required, this can be secured by the imposition of planning condition(s) on the basis this Planning Application is successful.

5.2.10 The proposal is not likely to give rise to unacceptable traffic impacts or compromise highway safety. The proposal is therefore compliant with Policy DMT 1 and Policy DMT 2 of Local Plan (Part 2), Policy T4 of the London Plan and the NPPF.

5.3 Noise

5.3.1 Policy D14 (Noise) of the London Plan 2021 states that "A In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:

1) avoiding significant adverse noise impacts on health and quality of life

2) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change

3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses

4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity

5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials – in preference to sole reliance on sound insulation

6) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles

7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receive

5.3.2 Reference is made within the NPPF to the Noise Policy Statement for England (NPSE), which sets out the long-term vision of the Government noise policy. Further information has been provided on the assessment of noise within recent Planning Practice Guidance, updated in July 2019 and available on the Government planning web site. Whilst this guidance does not provide any objective criteria upon which to base noise assessments, the guidance provides a description of the relevant Effects Levels identified within the NPPF and NPSE.

5.3.3 This Planning Application is supported by a Noise Assessment Report, full details of which can be found at Appendix 3 to this statement. The Noise Assessment Report notes, that the site has been operational

for a number of years. West London Composting has recently obtained planning permission to regularise the development and obtain permanent planning permission for the northern part of the site, where the composting operations are undertaken (Hillingdon Application Ref. 12579/APP/2021/2010).

5.3.4 There is a small waste transfer building located within the northern part of the site. It is proposed to replace this building with a larger building, capable of processing up to 50,000 tonnes per annum. The plant which presently operates within the building would continue to operate, with the materials sorted by hand. No additional plant is therefore required. There would be an increase in the vehicle movements to the building associated with the increased throughput, although the overall vehicle movements would remain low compared to those using the main composting facility.

5.3.5 Calculations and an assessment of the noise levels generated by the operation of the presently permitted and proposed operations have been made at the surrounding dwellings along Newyears Green Lane.

5.3.6 The assessment concludes that, whilst there would be a small increase in noise levels attributable to the operation of the waste transfer station, principally attributable to the increase in vehicles, the overall noise levels would remain very low and substantially below those associated with the permitted composting operations on the site. The operation of the replacement waste transfer building would therefore not result in any potential for adverse noise impacts at the neighbouring properties.

5.3.7 The proposal will not therefore conflict with Policy D14 (Noise) of the London Plan in terms of noise related impacts on local amenity.

5.4 Air Quality (including Odour & Dust Management)

5.4.1 Poor air quality is a major issue for London which is failing to meet requirements under legislation. Poor air quality has direct impacts on the health, quality of life and life expectancy of Londoners. In response, Policy SI 1 of the London Plan relates to “improving air quality” and states:

> *To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed:*
>
> *1) Development proposals should not:*
>
> *a) lead to further deterioration of existing poor air quality*
>
> *b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits*
>
> *c) create unacceptable risk of high levels of exposure to poor air quality*

2) In order to meet the requirements in Part 1, as a minimum: a) development proposals must be at least Air Quality Neutral b) development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures

5.4.2 Hillingdon Local Plan Part 2 sets out strategic objectives and policies for development in the Borough. Policy DMEI 14 relates specifically to air quality and states that:

'Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants. Development proposals should, as a minimum:
i. be at least "air quality neutral";
ii. include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and
iii. actively contribute towards the continued improvement of air quality, especially within the Air Quality Management Area

5.4.3 An Air Quality Assessment (AQ) screening report accompanies this Planning Application and is enclosed at Appendix 4 to this statement. The AQ screening report notes that the Site is not in the AQMA, as it lies over 800m to the north of the AQMA which covers the bottom two thirds of the borough, for annual mean and hourly average nitrogen dioxide.

5.4.4 In terms of Air Quality impacts from traffic, the Highways Agency, Design Manual for Roads and Bridges (DMRB) methodology provides the following screening criteria for the determination of potential air quality impacts as a result of vehicle exhaust emissions:

- Daily AADT flows change by 1,000 or more;
- Daily HDV AADT flows change by 200 or more;
- Daily average speed changes by 10km/hr or more; or
- Peak hour speed changes by 20km/hr or more.

5.4.5 Should changes be lower than these criteria, then the DMRB considers air quality impacts associated with a scheme to be negligible, and no further assessment is required.

5.4.6 The EPUK/IAQM planning guidance5 provides further indicative screening criteria whereby, in respect of changes in road traffic. Outside an AQMA, an air quality assessment, which would include exhaust, brake and tyre wear, may be required where proposals will:

- Cause a significant change in Light Duty Vehicle (LDV = cars and small vans <3.5t gross vehicle weight) traffic flows on local roads with relevant receptors i.e. a change of LDV (Light Duty Vehicle) flows of more than 500 AADT; or
- Cause a significant change in Heavy Dust Vehicles (HDV) flows on local roads with relevant receptors i.e. a change of HDV flows of more than 100 AADT.

5.4.7 The Site lies outside the LBH AQMA and the increase in traffic of 14 AADT is much lower than the EPUK/IAQM guidance level of 100 AADT for HDVs and much less than the DMRB level of 200 AADT for HDVs. The increased traffic volumes are therefore unlikely to have significant air quality effect on receptors and no further assessment is required.

5.4.8 In terms of Air Quality Neutral Traffic Emissions Benchmark, the trip rate for an industrial site in outer London is 6.5 trips/m^2 GIA/yr.6 The proposed building has a gross internal area (GIA) of 1,500m^2 and the total AADT for the proposed development will be 7,420, which equates to 4.9 trips/m^2 GIA/yr. The proposed development is therefore air quality neutral with respect to the trips benchmark.

Odour

5.4.9 All of the waste transfer and bulking of waste will be undertaken within the proposed building minimising the risk of nuisance to local amenity by way of odour. An Environmental Permit will be required to be obtained from the Environment Agency which we require the submission and approval of a Odour Management Plan. This will be controlled and monitored by the Environment Agency under the conditions of the Permit. Measures to minimise and control odour within the OMP will include:

- Clinical waste types will be kept segregated from the other wastes streams at all times;
- All potentially odourous wastes will be accepted and stored within a new dedicated WTS building. The WTS building will be fully enclosed, to ensure egress of odour from the building is minimised;
- Fast-acting roller shutter doors will be installed on the new WTS building, and kept closed during tipping and unloading of wastes;
- Waste to be stored outside of the WTS building will consist of asbestos, tyres and metal waste only in enclosed skips;

- Strict waste acceptance procedures will be adhered to, to ensure only permitted wastes are accepted on Site;
- All waste storage containers and bays will be clearly labelled to ensure the segregation of waste;
- Odour masking sprays will be fitted within the WTS building;
- Potentially odorous wastes will be a stored for minimal periods of time, with clinical/offensive waste stored for a maximum of 5 days, food waste for a maximum of 2 days and green waste for a maximum of 4 days.
- If significant odours are detected, investigations will be undertaken to determine the cause and appropriate remedial action taken.

Dust

5.4.10 The Site will be operated so as to minimise dust emissions from the site, in line with the DMP submitted as part of the Environmental Permit application. Measures that will be taken at the site include:

- The majority of waste will be accepted and stored within a new fully enclosed WTS building. Waste types stored outside will be contained within enclosed skips.
- Wastes stored outside of the WTS building will consist of asbestos, tyres and metal waste only;
- The WTS building will have fast action roller shutter doors that will be closed during tipping and waste handling;
- Speed limits will be implemented for vehicles using the Site;
- Traffic calming measures will be implemented to enforce speed limits & reduce emissions of dust;
- Site access roads and operational areas will be maintained and repaired to minimise emissions of dust due to uneven and poor surfacing;
- All roads and operational areas will be swept where necessary to reduce dust emissions;
- All vehicles delivering waste to the Site shall be sheeted to minimise emissions of dust; and
- Drop heights will be minimised to prevent emissions of dust.

5.4.11 If significant dust is detected, investigations will be undertaken to determine the cause and appropriate remedial action taken.

5.4.12 In overall terms, the proposal will not give rise to unacceptable Air Quality impacts (including odour and dust) in compliance with Policy SI 1 of the London Plan, Policy DMEI 14 of the Hillingdon Local Plan Part 2 and the NPPF.

5.5 Ecology & Biodiversity Net Gain

5.5.1 Policy G6 (Biodiversity and access to nature) of the London Plan states that Sites of Importance for Nature Conservation (SINCs) should be protected. It also requires development proposals to manage impacts on nature conservation and aim to secure net biodiversity gain as part of development proposals. This should be informed by the best available ecological information and addressed from the start of the development process. Proposals which reduce deficiencies in access to nature should be considered positively.

5.5.2 Policy DMEI 7 (Biodiversity Protection and Enhancement) of the Hillingdon Borough Local Plan (Development Management Policies) states that:

> *The design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site… If development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects. The development must provide a positive contribution to the protection and enhancement of the site or feature of ecological value.*

5.5.3 Chapter 14 of the NPPF also deal with 'Conserving and enhancing the natural environment' and seeks to protect and enhance the natural environment.

5.5.4 An Ecological Assessment report is enclosed at Appendix 5 to this Planning Statement. The report presents the approach, results and evaluation of the assessments and survey undertaken at the Site in order to determine the ecological baseline and nature conservation value of the Site.

5.5.5 The Site lies within the Impact Risk Zone (IRZ) of two statutory designated sites of nature conservation importance: Ruislip Woods SSSI & NNR and the Mid Colne Valley SSSI. The proposed waste transfer and bulking operations will be undertaken within the proposed building and no activities outside in the yard. The Ruislip Woods SSSI & NNR and the Mid Colne Valley SSSI's are more than 400 metres from the proposed development and will not in any way be impacted by the replacement waste transfer station building operations.

5.5.6 The Site is comprised of predominantly hardstanding alongside three storage buildings/features associated with the active West London Composting facility on site. A small area of bare ground is present adjacent to one the building features within the Site. The Site is unlikely to impact upon any protected or notable species. No further surveys are considered necessary.

5.5.7 No non-statutory Nature Conservation Sites or S41/Priority Habitats will be negatively impacted by the proposed development.

Biodiversity Net Gain

5.5.8 In terms of Biodiversity Net Gain, the Biodiversity Gain Requirements (Exemptions) Regulations 2024 at paragraph 4 sets out the "de minimis exemption" in relation applications for development and confirms that:

> *4.—(1) The biodiversity gain planning condition **does not apply** in relation to planning permission for development which meets the first and second conditions*
> *(2) The first condition is that the development does not impact an onsite priority habitat.*
> *(3) The second condition is that the development impacts—*
> *(a)less than 25 square metres of onsite habitat that has biodiversity value(1) greater than zero; and*
> *(b)less than 5 metres in length of onsite linear habitat.*
> *(4) For the purposes of this regulation—*
> *(a)"priority habitat" means a habitat specified in a list published under section 41 of the Natural Environment and Rural Communities Act 2006(2);*
> *(b) a habitat is impacted where the habitat is lost or degraded such that there is a decrease in the biodiversity value of that habitat;*
> *(c) "linear habitat" means the types of hedgerow habitat or watercourse habitat identified for the purposes of the biodiversity metric(3) (which are measured by length (expressed in kilometres) rather than area)*

5.5.9 Due to the nature of the proposals, there will be only very minor habitat loss largely associated with bare ground related to the development of the Site boundaries. This area was approximately 1m wide and 20m in length. The proposal will not therefore affect any onsite priority habitat and will affect less than 25 square metres of onsite habitat that has biodiversity value greater than zero; and less than 5 metres in length of onsite linear habitat. The biodiversity net gain planning condition therefore does not apply to the proposal as it meets the de minimis exemption tests set out above.

5.5.10 In overall terms, the proposal is fully compliant with the policy aspirations of Policy G6 on the London Plan, Policy DMEI 7 of the of the Hillingdon Borough Local Plan (Development Management Policies) and the NPPF in terms of protecting and enhancing nature conservation.

5.6 Landscape & Visual Impact

5.6.1 Policy WLWP 4 (Ensuring High Quality Development) of the WLWP provides that all waste development proposals will be required to demonstrate, for both the construction and operational phases of the development, that

> *c. The development is of a scale, form and character appropriate to its location and incorporates a high quality of design, to be demonstrated through the submission of a Design and Access statement as appropriate;*

5.6.2 The proposed replacement waste transfer station building will be located in the same location as the existing waste transfer station building. To the east of the proposal there a number of existing structures/buildings associated with the adjacent In-Vessell Composting Facility. Immediately adjacent and to the west, there are a number of large industrial buildings which are of a similar size and scale to the proposed replacement waste transfer station building.

5.6.3 Views of the proposed building from public and residential viewpoints will be limited due to intervening hedgerows, trees and vegetation and the surrounding buildings. Nearby land-uses immediately outside of the site within 1km typically consist of farms and their associated farmland, small industrial sites with a variety of businesses, several individual properties, works associated with High Speed 2 and woodland.

5.6.4 The proposed replacement waste transfer station building will not give rise to unacceptably adverse landscape and visual effects and therefore does not conflict with Policy WLWP 4 of the WLWP.

5.7 Flood Risk & Surface Water Drainage

5.7.1 Policy DMEI 9 (Management of Flood Risk) of the Hillingdon Borough Local Plan (Development Management Policies) seeks to steer new development away from Flood Zones 2 and 3 unless there is no suitable alternative.

5.7.2 Policy SI 12 (Flood risk management) of the London Plan 2021 requires development proposals to minimise and mitigate flood risk and ensure that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.

5.7.3 Chapter 14 of the NPPF (Meeting the challenge of climate change, flooding and coastal change) seeks to locate development in low flood risk areas and avoid unacceptable impacts upon the water environment.

5.7.4 In this case, the Application Site is located within Flood Zone 1 of the Environment Agency's Flood Zone Maps. The NPPF confirms that 'A site-specific flood risk assessment is required for proposals of 1 hectare or greater in Flood Zone 1'. The Planning Application boundary is only 0.64 hectares in size and therefore a site-specific flood risk assessment is not required in this case.

5.7.5 The waste transfer and handling operations will be undertaken within the proposed replacement building. Rainwater from the roof of the building will be harvested and delivered to the fire water tanks. The outside yard has an impermeable concrete surface which drains to a manhole which drains to a ditch on Newyears Green Lane outside the gate on the northern boundary via an oil interceptor.

5.8 Fire Prevention Plan

5.8.1 In line with Policy D12 of the London Plan, an application should be accompanied by a fire statement, prepared by a suitably qualified third-party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

5.8.2 The proposed development relates to a waste management facility which requires an Environmental Permit to be obtained from the Environment Agency in order to operate the facility. As part of that Environmental Permit Application, the Applicant will be required to demonstrate compliance with the strict Fire Prevention Plan (FPP) guidance – see link to the guidance here: Fire prevention plans: environmental permits - GOV.UK (www.gov.uk)

5.8.3 The Applicant's has enclosed at Appendix 6 to this report a Fire Prevention Plan, which accompanies an Environmental Permit application. Paragraph 201 of the National Planning Policy Framework (Dec 2024) states that:

> *"The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities"*

5.8.4 In light of the NPPF's policy position, the LPA should therefore assume that the FPP requirements of the Environmental Permitting Regulations 2016 will minimise fire risk and provide measures of adequately

dealing with a fire in an environmentally sensitive manner. It is therefore concluded that no Policy D12 compliant fire safety statement is required in this case.

5.9 Other Environmental Issues

5.9.1 Policy WLWP 4 (Ensuring High Quality Development) states that:

> *'All waste development proposals will be required to demonstrate, for both the construction and operational phases of the development, that:*
> *b. Adequate means of controlling noise, vibration, dust, litter, vermin, odours, air and water-borne contaminants and other emissions are incorporated into the scheme…'*

5.9.2 All of the waste transfer and bulking of waste will be undertaken within the proposed building minimising the risk of nuisance to local amenity by way of odour, vermin, and litter. Asbestos, tyres and metals will be stored outside in a sealed skip.

5.9.3 The proposed waste transfer station facility will be controlled by the Environment Agency via the requirement to vary the Applicant's existing Waste Management Licence (now referred to as an Environmental Permit). That permit will require the Applicant to manage, control and continuously update various management plans as part of the running of the waste management operations. Together with the controls imposed by planning conditions, the proposed development will not give rise to unacceptable local amenity impacts in compliance with Policy WLWP 4.

6 ENERGY EFFICIENCY

6.1.1 The Applicant is required under the existing Environmental Permit, issued and controlled by the Environment Agency, to improve energy efficiency on site. On the basis that this Planning Application is successful, the Applicant will seek a variation of the Permit. This also extends to resource procurement, sourcing and usage. In brief, the Applicant's existing Environmental Permit requires:

- Take appropriate measures to ensure that energy is used efficiently in the activities and that raw materials are used efficiently including water
- Review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and minimise the use of raw materials
- Take any further appropriate measures identified by a review.
- Avoid and if not, possible recover wastes produced as part of the site operations and associated activities

6.1.2 The Environmental Permitting Regulations also require the Applicant to show compliance to various Best Available Techniques (BAT) conclusions. This includes BAT 29 – Energy Efficiency. Energy efficiency has a strong financial as well as environmental footing and is widely adopted across many businesses with the primary motivator being the reduction in costs rather than any environmental credential. The IMS (integrated Management System) already includes functions to assess and justify energy efficiency within the system.

6.1.3 In addition, the Applicant undertakes energy reviews as part of ISO 14001 accreditation to continually improve its performance in efficiency as is required by the standard. The only site energy input is the use of diesel in heavy plant machinery of which there is no alternative at this moment in time. The Applicant does though intend seek to improve energy efficiency through the following methods:

- Analysing new machinery purchases and maintaining a modern fleet of machines which have been assessed against environmental suitability/efficiency
- Engaging employees on training which aids in efficient driving of machinery
- Monitoring and recording usage
- Ensuring machines are maintained in the most efficient order as per the manufacturer's schedules

6.1.4 Where possible replacing the more polluting with the less polluting or replacing COSHH substances which are more harmful with those that are less harmful.

7 CIRCULAR ECONOMY STATEMENT

7.1 Introduction

7.1.1 A potentially referable application is defined as "an application for planning permission of potential strategic importance (PSI)" by the Mayor of London Order 2008. Part 3 (Development Which May Affect Strategic Policies)) states at Category 3D:

> *'Development – (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floor space of more than 1,000 square metres or a material change in the use of such building.'*

7.1.2 Policy SI7 of the London Plan requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, whilst London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. Therefore, the Applicant has therefore set out below a Circular Economy Statement in accordance with GLA guidance.

7.2 Planning Policy Context

7.2.1 Paragraph 9.7.1 of the London Plan 2021 states that:

> *Waste is defined as anything that is discarded. A circular economy is one where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste. London should move to a more circular economy as this will save resources, increase the resource efficiency of London's businesses, and help to reduce carbon emissions. The successful implementation of circular economy principles will help to reduce the volume of waste that London produces and has to manage. A key way of achieving this will be through incorporating circular economy principles into the design of developments (see also Policy D3 Optimising site capacity through the design-led approach) as well as through Circular Economy Statements for referable applications.*

7.2.2 Policy SI 7 (Reducing waste and supporting the circular economy) of the London Plan 2021. Part B of Policy SI 7 requires that referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:

1) how all materials arising from demolition and remediation works will be re-used and/or recycled
2) how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life
3) opportunities for managing as much waste as possible on site
4) adequate and easily accessible storage space and collection systems to support recycling and re-use
5) how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy
6) how performance will be monitored and reported.

7.2.3 Policy D3 of the London Plan 2021 deals 'Optimising site capacity through the design-led approach'.

7.2.4 The GLA has produced guidance (adopted March 2022) for Applicant's who are required to submit Circular Economy (CE) statements. The document notes that the six circular economy (CE) principles, which should be a fundamental part of the building design process, are:

1. building in layers – ensuring that different parts of the building are accessible and can be maintained and replaced where necessary
2. designing out waste – ensuring that waste reduction is planned in from project inception to completion, including consideration of standardised components, modular build, and reuse of secondary products and materials
3. designing for longevity
4. designing for adaptability or flexibility
5. designing for disassembly
6. using systems, elements or materials that can be reused and recycled.

7.2.5 The principles support the application of the waste hierarchy in that avoiding or reducing waste is prioritised.

7.2.6 At paragraph 9.7.2 of the London Plan, it states:

The adoption of circular economy principles for referable applications means creating a built environment where buildings are designed for adaptation, reconstruction and deconstruction. This is to extend the useful life of buildings and allow for the salvage of components and materials for reuse or recycling. Un-used or discarded materials should be

brought back to an equal or comparable level of quality and value and reprocessed for their original purpose (e.g. recycling glass back into glass, instead of into aggregate).

7.2.7 The proposed development seeks to replace an existing dilapidated building with a purpose built waste transfer station building on the site. A proportionate response to the need for Circular Economy Statement is therefore required in this case. The following section therefore sets out a response to the matters 1 - 6 in Part of Policy SI 7 of the London Plan 2021.

1) How all materials arising from demolition and remediation works will be re-used and/or recycled

7.2.8 The existing building is a steel frame portal building with concrete blocks, corrugated sheeting and cement fibre roof panels (as shown on the photographs below). All of the materials (where possible) will be recycled and re-used. The concrete blocks and cement roof sheets will be crushed and re-used as secondary aggregate. All of the steel will be taken to a metal recycling facility for onward processing and recycling.

2) How the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life

7.2.9 The proposed building will be a simple portal frame design with internal concrete push walls. Corrugated plastic-coated steel sheeting on the walls and roofs will be used to enclose the building. All of these materials will be capable of being recycled and re-used once the building has come to the end of its useful life.

3) Opportunities for managing as much waste as possible on site

7.2.10 It is in the Applicant's interest to use as much waste on site as possible. Recovered concrete during the construction works has the opportunity to be used as a sub-base during the construction of the base of the new building.

7.2.11 Strategic Objective 2 of the Waste Local Plan (WLP) seeks to encourage development which supports sustainable waste management at least in line with national targets for recycling, recovery and composting. At paragraph 3.2.1.1, the WLP confirms that:

> *National policy states that in preparing local plans, WPAs should drive waste management up the waste hierarchy. This means encouraging prevention of waste, and preparing for the re-use, recycling and recovery of waste (including recovery of inert waste to land).*

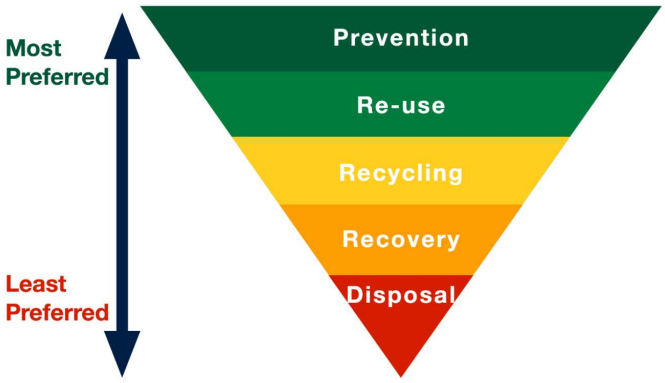
7.2.12 The proposal will make an important contribution to improving recycling rates and helping to meet the Government's climate change agenda. The proposal therefore complies with the London Plan's aspiration of moving towards a circular economy and increasing the resource efficiency of London's businesses.

4) Adequate and easily accessible storage space and collection systems to support recycling and re-use

7.2.13 One of the fundamental objectives of the Applicant's proposal is to provide a waste transfer station to increase the recycling of commercial/industrial/municipal and construction and demolition waste. Commercial, industrial and municipal waste will include (but not limited to) cardboard, plastics, metal, paper and wood whilst the construction and demolition waste will include rubble, and hardcore and general municipal waste streams. The proposal also has the potential to bulk up food waste in sealed vessels and dry mixed recyclables. The proposal therefore provides adequate and accessible storage space to support the recycling and reuse of waste streams in compliance with part 4) of Policy SI 7.

5) How much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy

7.2.14 All of the waste materials generated during demolition works are capable of being recycled and re-used. Once the new WTS building is constructed and operational, the proposed development will make a significant and important contribution to improving recycling rates in the West London area diverting waste from landfill and moving waste up the waste hierarchy (as shown below).



7.2.15 The Applicant's proposal shows full compliance with the Mayor of London's aspirations of moving towards a circular economy and is therefore a sustainable form of development.

6) How performance will be monitored and reported.

7.2.16 The Applicant's sustainable waste management activities are monitored and controlled under the existing Environmental Permit by the Environment Agency who make regular monitoring and audited site visits. The Applicant is required to provide annual reports to the Environment Agency demonstrating compliance with the conditions of the Permit.

7.2.17 On the basis that the Planning Application is successful, the Applicant will be required to vary the existing permit to bring it in line with the Environment Agency's modern 'appropriate measures' guidance. The monitoring and reporting requirements of the Environmental Permitting Regulations 2016, together with the planning conditions imposed on any grant of planning permission will ensure that the proposal complies with Policy SI 7 of the London Plan in terms of monitoring the site's performance.

7.2.18 The Circular Economy Statement confirms that the proposal is highly sustainable form of development by recovering recyclable waste materials thereby complying with the Government's aspirations of creating a circular economy and moving waste up the hierarchy.

7.3 Conclusion

The Applicant's proposal shows full compliance with the Mayor of London's aspirations of moving towards a circular economy. The proposed development will make a significant and important contribution to increasing waste recycling capacity in the West of London area and will divert waste from landfill, moving waste up the waste hierarchy.

8 CONCLUSIONS

8.1 The Planning Balance

8.1.1 The Application Site is identified as an existing waste management facility in the West London Waste Local Plan and safeguarded for waste management uses. The Application Site also benefits from lawful use certificates for the operation of a waste transfer station. The principle of a replacement Waste Transfer Station building on the Application Site is therefore fully compliant with the suite of Development Plan requirements.

8.1.2 The proposal is considered to meet the 'Grey Belt' policy tests of paragraph 155 of the NPPF. The proposed development is not therefore considered to be inappropriate development in the Green Belt, and it is not necessary to demonstrate very special circumstances in this case. However, on the basis that the WPA considers that the proposal is inappropriate development in the Green Belt, the Applicant's very special circumstances case clearly outweighs any limited harm by reason of inappropriateness.

8.1.3 The proposal will make an important contribution to increasing recycling rates, reducing emissions and helping to meet the Government's climate change agenda. In addition, the proposal will also contribute to towards the Mayor of London's aspirations of creating a circular economy, which is defined as 'Reducing waste and supporting the Circular Economy' as one where materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste. The proposal will also contribute to the aspirations of Policy S18 of the London Plan to enable London to manage the equivalent of a 100% of its own waste by 2026. There is therefore a clear and demonstrable need for the proposal.

8.1.4 The assessment of environmental and local amenity impacts demonstrates that the proposal will not give rise to any unacceptable impacts. Planning conditions can be imposed to control and mitigate the proposed development alongside the Applicant's Environmental Permit which will control emissions and pollution (e.g. dust, odour, fire etc) related issues. Paragraph 201 of the NPPF notes that:

> *"The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities".*

8.1.5 Having regard to the assessment above, it concluded that the benefits of the proposal significantly outweigh any limited negative impacts. The proposal is therefore fully compliant with the Development Plan and the NPPF by being a sustainable form of waste management development which should be supported by the Waste Planning Authority.

APPENDIX 1: CERTIFICATES OF LAWFUL USE

APPENDIX 2: TRANSPORT STATEMENT

APPENDIX 3: NOISE ASSESSMENT

APPENDIX 4: AIR QUALITY

APPENDIX 5: ECOLOGICAL ASSESSMENT

APPENDIX 6: FIRE PREVENTION PLAN

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