

Firstplan



**PROPOSED AGGREGATE
RECYCLING FACILITY, ASPHALT
PLANT AND GULLY WASTE
RECYCLING PLANT**

**AT
FORMER POWERGEN SITE
NORTH HYDE GARDENS
BULLS BRIDGE
HAYES
UB3 4QR**

**PLANNING
STATEMENT**

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SECTION 1: INTRODUCTION

- 1.1 This Planning Statement has been prepared by Firstplan on behalf of FM Conway Ltd ('FM Conway') in support of a planning application in respect of the Former Powergen Site, North Hyde Gardens, Bulls Bridge, Hayes, London, UB3 4QR ('the application site'). The site comprises vacant brownfield land measuring 3.00 hectares, located either side of North Hyde Gardens. Because this section of North Hyde Gardens comprises a shared access with the adjoining occupant, it has been included within the red line boundary for the purposes of the planning application. Accordingly the area enclosed within the red line actually amounts to 3.09 hectares. This is explained further in Section 3 below.
- 1.2 Submission of the application follows discussions with the London Borough of Hillingdon (LBH), the Greater London Authority (GLA) and British Waterways (now the Canal and River Trust).
- 1.3 The application seeks permission for the following:
- “Redevelopment of the site to provide an aggregate recycling and processing plant, asphalt plant and storage facility, gully waste recycling plant, aggregate storage facility, and term maintenance depot, with ancillary offices, structures and facilities, car and lorry parking, regrading, and landscaping.”**
- 1.4 This statement is submitted as part of the planning application documentation, and should be considered in conjunction with the application drawings, Design and Access Statement, Heritage Statement, accompanying environmental studies and the Transport Impact Assessment.
- 1.5 The proposals have, as far as possible, been developed having regard to the discussions with LBH and the GLA, and have been designed to meet the requirements of the applicant and the relevant policies in the development plan.
- 1.6 Information regarding the applicants, their operations and how they have developed their business is provided in the following Section. A description of the site and surrounding area is provided at Section 3. An outline of the relevant planning history for the site is detailed at Section 4. A description of the application proposals is provided at Section 5. Relevant national planning policy is set out at Section 6 and strategic policy considerations are set out at Section 7. The relevant development



plan policies are considered at Section 8. General planning considerations and an evaluation of the proposals are provided at Section 9. The pattern of existing aggregate recycling facilities and asphalt production plants serving the area is dealt with at Section 10. Our conclusions are set out at Section 11.



SECTION 2: THE APPLICANT AND MARKET NEED

a) The Applicant

- 2.1 FM Conway was established as a road surfacing and maintenance contractor by Frank Conway in 1961 and remains a privately owned company. The company ethos is dedicated to customer care, quality and the environment. Under the guidance of Michael Conway since 1978 the company has grown considerably and now has the capacity to embrace a fully comprehensive range of disciplines within the Highway Maintenance Civil Engineering & Building Industries. Turnover in 2011 was in the order of £140m. The company currently has just over 750 direct employees, with a similar number of sub-contractors.
- 2.2 In January 2001 the main offices, workshops and yard was centralised and relocated to a 5.7 hectare (14 acres) site close to the A2 Rochester Way, Dartford Heath, which was well placed for serving Contracts to the south east of London. This move provided the necessary space and facilities to further develop the company's expertise in waste minimisation in conjunction with recycled and alternative materials.
- 2.3 Since moving to Dartford Heath the business has continued to grow. The culmination of the investment can be seen in a new, state of the art Asphalt Plant at Erith, with its own jetty on the River Thames, capable of receiving aggregate cargoes of up to 6,000 tonnes. The plant commenced operations during June 2010 and was officially opened in on the 25th November 2011, producing what the company claims is the "greenest" asphalt in the UK, utilising recycled aggregates from the Company's recycling operation at Dartford Heath.
- 2.4 The company also owns and operates one of the largest, most modern fleet of vehicles in the South East.
- 2.5 As a company, FM Conway has different functions, and a number of specialist Divisions, combining, to provide a comprehensive service to its clients, most of which are the London Boroughs. The various divisions are detailed below:



i) The Highway Maintenance Division

2.6 This has made FM Conway Ltd one of the major Highways Term Maintenance contractors, currently operating in 20 of the 33 London Boroughs.

2.7 Term Maintenance contracts presently carried out include the following:

- Carriageway / footway reconstruction
- Carriageway planing
- Drainage
- 24hour emergency service
- General emergencies
- Gully emptying
- Maintenance of bridges/ structures
- Planned and responsive highway maintenance
- Traffic management schemes
- Surfacing of carriageways/ footways
- Trench reinstatements
- Vehicle crossovers
- Bus stop improvements
- Winter Maintenance

2.8 The map attached at Appendix 1 identifies the London Boroughs where the company currently operates.

APPENDIX 1

ii) The Surfacing Division

2.9 This Division operates its own planers and paving machines. It has a one stop capability for all types of surfacing or resurfacing including:

- Carriageways resurfacing



- Footway resurfacing
- Highway Maintenance
- White-Lining
- Car parks
- Cycle ways
- Decorative Surfacing
- Motor Racing/ Karting tracks

iii) The Cleansing Division

2.10 This division offers a comprehensive range of specialist vehicles, equipment and trained staff to tackle all drainage and sweeping needs, such as:

- High pressure drain cleaning
- Gully emptying
- Soakaway cleaning
- Interceptor gulping
- Sewer cleaning
- CCTV in sewer surveys
- Road sweeping
- Drain locating and investigations
- Flood clearing
- Cesspool and septic tank emptying
- Root cutting
- Traffic Management

iv) The Building and Maintenance & Structures Division

2.11 This division maintains and repairs a diverse range of structures and buildings from minor repairs on schools to carrying out cathodic protection and concrete repairs to a



major London flyover structure. In addition, general building, mechanical and electrical maintenance works are carried out for a wide client base on the following:

Structures

- Bridge - Construction, Repair and Maintenance
- Embankment walls - Construction, Repair and Maintenance
- Pedestrian subways - Refurbishment and maintenance including graffiti removal
- Pipe subways - Entry maintenance and repair by confined space crews
- Underpasses - Cleaning, lighting and management
- Parks and gardens - Maintenance of statues and park buildings
- Rail/Underground Structures (Link-Up registered supplier)

Building and Maintenance

- Public Buildings - Construction, Repair and Maintenance
- Defence Establishments - Construction, Repair and Maintenance
- Schools and Colleges - Construction, Repair and Maintenance
- Commercial Buildings - Construction, Repair and Maintenance
- Framework Contracts - Construction, Repair and Maintenance
- M&E - Construction, Repair and Maintenance

vi) The Civil Engineering Division

2.12 This division has the capability of undertaking a diverse range of civil engineering contracts from £60k to £10m including:

- Carriageways/ footways/ highway structures improvement schemes
- Construction/ reconstruction of school playgrounds
- Construction/ reconstruction of streetscapes
- Car park construction/ reconstruction
- Rail/Underground Civil Engineering (Link-Up registered supplier)
- High Quality Landscapes (BALI member)



- Dock construction repairs and improvements
- Drainage connections and improvements including deep shafts and headings
- Excavation and groundwork's
- Ducts and chambers for IT and Services
- Environmental improvement works
- Motor racing/ Karting circuit construction and improvements
- Piling works
- Remediation works
- Restoration of parks and cemeteries
- Retaining wall construction
- Revetment works
- Traffic Management schemes
- York stone paving
- Artificial stone paving
- Block paving and SUDS drainage

2.13 The Company is also an authorised contractor for Rhinopatch infra-red blacktop patch recycling as an alternative to carriageway or footway patching.

vii) The London Paving Division

2.14 The Paving Division has the technical expertise and traditional craftsmanship to offer cost effective solutions to a variety of quality paving and hard landscaping projects. In partnership with a number of local authorities, London Paving has completed many high profile pedestrian schemes in and around London which include many of London's premier Heritage sites.

2.15 The Division can provide a fully integrated design and installation package which includes:

- Decorative paving
- Pedestrian schemes



- Traffic calming
- Environmental improvements
- Hard and Soft Landscaping (BALI Member)
- Infrastructure works
- Monuments
- Statues

viii) The Aggregates & Asphalt Division

2.16 This principally supports the other Divisions operating, at present, from Dartford and Erith. The company philosophy is to recycle and reuse everything possible with a 'Zero to Landfill' ethos (see attached Company brochure at Appendix 2). By a combination of innovation and experience, up to 98% of all arisings are recycled and re-used, principally to the sites from which the material came. The 2% (scrap metal, plastic, wood & paper) which cannot be recycled or re-used by the company is recovered and sent elsewhere for recycling.

APPENDIX 2

ix) Aggregate Recycling Plant at Dartford

2.17 Products from the recycling activities include:

- Type 1
- Sub-bases & capping materials
- Type 4
- Recycled Asphalt Products (RAP) Used as raw material at Erith Asphalt Plant
- Single size and graded concreting aggregates including ballast
- Recycled sand
- Drainage materials

2.18 Much of the recycled ballast is used as a raw ingredient in the supply of concrete. The company operates a fleet of volumetric truck mixers. These vehicles carry the



quantity of concrete required for each different job, and the mixing takes place at the point of use, with no wastage.

- 2.19 The facility at Dartford also houses the company's own specialised Drainage Treatment Plant which is capable of treating 30,000 tonne of drainage waste per year, and produces water for aggregate washing and concrete production, as well as providing a percentage of the fine aggregates via the wash plant.

b) The need for Bulls Bridge

- 2.20 The growth and continuing demand for the company's services has led to the need for a new operating centre as its activities spread towards west London. The demand by clients, notably London Boroughs, for sustainable development, environmental best practice, innovative solutions, and cost effectiveness, underpins the company's desire to meet this need. At present the west London market is primarily served by companies without the comprehensive state of the art facilities proposed by FM Conway for the Bulls Bridge site.
- 2.21 The intention is to establish an operating centre at the application site that will combine the company's activities at Dartford and Erith at a single site which will minimize traffic movements, satisfy the company's customers, and represent a more sustainable operating model, better able to serve its growing business. Unnecessary traffic movements from west London to the company's current operations at Dartford or Erith will also be avoided.
- 2.22 This planning application seeks permission for the following facilities:
- Aggregate recycling plant
 - Asphalt production and storage plant
 - Gully waste recycling plant
 - Operating centre for Term Maintenance and other Company Divisions
 - Operating hub for company vehicles and equipment
 - Ancillary offices
 - Car and lorry parking



- 2.23 Full details of the application proposals are set out in the following sections of this report as well as in the other supporting reports, statements and drawings that comprise this planning application.
- 2.24 The proposals represent a significant new investment for the company and an important step in the company's evolution. When at full capacity the new development will provide up to 79 jobs including those working on site, company lorry drivers, and Term Maintenance employees.
- 2.25 From the company's viewpoint, sustainability and cost effectiveness are the two key factors behind FM Conway's aspirations to obtain planning permission on the application site.



SECTION 3: SITE AND SURROUNDING AREA

- 3.1 The application site is located at the end of North Hyde Gardens, adjacent to, and below, the elevated A312 flyover. Historically the site was used as a creosote works, and more recently as a power station, although the site has remained vacant for over 10 years.
- 3.2 Since the last use ceased, the site has been cleared and the buildings demolished and the former surface has been moved to form approximately 3 metre high bunds around the perimeter of the main site. The centre of the site, within the bund, is predominantly level and some light scrub vegetation remains. The bunds prevent views into the site from all sides, with the exception of the elevated flyover to the west.
- 3.3 The site is bounded to the north by a main railway line (on an embankment approximately 5 metres above the site level), to the east by the Paddington Branch of the Grand Union Canal and towpaths, and by North Hyde Gardens - a private road owned and maintained by occupants of the industrial estate - to the south and west. A separate parcel of land is located between North Hyde Gardens and Yeading Brook, part of which is located beneath the elevated flyover, also forms part of the application site.
- 3.4 The total site area proposed for development is 3.00 hectares. However, as set out in paragraph 1.1, for completeness, the short section of North Hyde Gardens which runs North to South along the western boundary of the main part of the site has been included within the red line boundary for the purposes of this planning application. This is because this part of North Hyde Gardens will form the shared access road to the FM Conway site, when operational, together with the DHL storage and distribution centre to the west of the site, beyond Yeading Brook.
- 3.5 Including this short section of North Hyde Gardens increases the area enclosed within the red line on the planning application drawings to 3.09 hectares. However, no works are proposed to the access road, save for the creation of the site entrance and exit. As such, this will remain unaffected by the works associated with the planning application.



- 3.6 This short section of North Hyde Gardens splits the site into two distinct portions. The larger, main part of the site measures 2.7ha, whilst the smaller area, to the west of North Hyde Gardens measures 0.3ha. This smaller area provides the proposed location for staff and visitor car parking, together with landscaping.
- 3.7 The industrial nature of the site and surrounding area is well established. The historic uses of the site were heavy industrial. Indeed, the surrounding uses still comprise significant manufacturing, storage and distribution facilities; and, furthermore, the most recent planning permission for the site (November 2008) permitted the erection of large-scale buildings for use as B1, B2 or B8 purposes.
- 3.8 On the western boundary, beyond North Hyde Gardens, is Yeading Brook. This is bounded by self-seeded vegetation of limited ecological value. Beyond Yeading Brook is the British Airways Component Engineering building and a DHL Storage and Distribution Centre (accessed via the short section of North Hyde Gardens which cuts through the application site).
- 3.9 To the east, beyond the existing rows of trees, which are located either side of the site boundary (delineated by a chainlink fence) is the Canal. The Paddington branch of the Grand Union Canal and adjoining land up to the site boundary forms part of the adjacent Bulls Bridge Conservation Area.
- 3.10 Ealing Council's administrative area is located further to the east, and this extends to the middle of the canal. Immediately beyond the canal and towpaths, is the Brent Park Industrial Estate (within Ealing). Leisure moorings are located along part of this canal, on the western side.
- 3.11 Beyond North Hyde Gardens, to the south, is an area of land owned by the Canal and River Trust (formerly British Waterways). This accommodates dilapidated buildings, including an old tollhouse building. Planning permission has recently been granted for the redevelopment of this site to provide accommodation for up to 20 coaches and a large workshop / warehouse building, together with a separate consent for the demolition of the derelict cottages within the site (see details below).
- 3.12 Beyond this, to the south-east, is Bulls Bridge, which is a grade II listed structure. The centre of the Grand union canal, which passes east to west beyond Bulls Bridge, forms the administrative boundary between Hillingdon and Hounslow Council.



- 3.13 A Volvo Truck and Bus Centre is also located to the South of North Hyde Gardens, adjacent to the British Waterways Land.
- 3.14 Beyond the immediate vicinity of the application site the predominant land use is also heavy industrial and/or storage and distribution. The various operators, including Nestle, British Airways and Vodafone, occupy the remainder of the Industrial Estate. On the opposite side of the canal – in the London Borough of Ealing – the Industrial Estate continues and the general industrial, storage and distribution uses line the eastern boundary of the Grand Union Canal, Paddington Branch. In this context it is noteworthy that the only vacant site on the Industrial Estate is the application site. To the south, beyond the Grand Union Canal, is a large 24 hour Tesco foodstore and surface level car park (located within the London Borough of Hounslow).
- 3.15 There is therefore a varied mix of operators in the surrounding area, although industrial and storage and distribution uses are by far the most prevalent.
- 3.16 With regards to access, North Hyde Gardens provides the only vehicular access to the application site and the wider Industrial Estate, and this in turn leads to North Hyde Road and the wider strategic highway network beyond. There is no direct access from the Grand Union Canal, or the towpaths, to the application site.



SECTION 4: PLANNING HISTORY

a) Former Powergen Site

- 4.1 The application site has been vacant for over 10 years although the former power station was decommissioned in 1993. It is characterised by cleared ground with self-seeded vegetation with a significant bund, approximately 3 metres high, around the perimeter. Since the last use ceased a number of industrial and commercial proposals have been approved and details of the relevant applications are set out below.
- 4.2 An outline application was approved on 3 September 1997 for the erection of buildings for use within Classes B1, B2 and B8 (involving demolition of disused power station) (ref: 13226/G/96/0250). A number of reserved matters applications were subsequently approved (ref: 13226/K/97/1889; 13226/L/97/1889; 13226/AF/98/2445; 13226/5/98/0093; 13226/AK/99/1758; 13226/Z/98/1635 and 13226/APP/2000/2743).
- 4.3 Following this, an application was approved on 12 February 1998 for the erection of a building for use as a civil flight training centre or for purposes within Class B2/ B8 with ancillary offices and associated car parking and landscaping (ref: 13226/J/97/1460). A number of subsequent applications (ref: 13226/X/98/0867; 13226/AA/98/1634 and 13226/AE/98/2359) were approved for details required by conditions attached to permission 13226/J/97/1460.
- 4.4 An application was then approved on 7 June 1999 for the remedial treatment of on-site contamination involving installation of funnels, soakaway chambers and monitoring wells including temporary diversion of Yeading Brook and restoration with associated landscaping (ref: 13226/AG/99/0457). This planning permission was implemented and the works permitted remain in place today.
- 4.5 A subsequent application was approved at the site on 26 September 2000 for the use of land for the parking of trailers, lorries and cars, provision of a lorry area and fuel areas and erection of a security office (13226/APP/2000/1902).
- 4.6 An application was submitted to the Council for the erection of a building for use within Class B1(c), B2 or B8 of the Town and Country Planning (Use Classes) Order 1987 or a construction waste recycling centre (13226/APP/2001/527). The Council



sent a letter to the applicant on 21/11/2008 requesting additional documentation, however, the agent did not respond and as a result the application was withdrawn on 4 March 2009. The Council does not have a record of any of the associated planning application documents.

- 4.7 The most recent planning permission was in November 2008, when consent was granted for the erection of buildings for use within classes B1(c), B2 and B8 of the Town and Country Planning (Use Classes) Order 1987 (as amended) (ref: 13226/APP/2001/849). This was not implemented.
- 4.8 An application was also submitted for the erection of buildings for use within Class B1(c), B2 and B8 (13226/APP/2002/2226), however, this was subsequently withdrawn on 04/12/2008.

b) Other Sites

- 4.9 A number of applications have also been submitted for the various commercial and industrial sites adjacent to and near to the application site. These demonstrate the recognised, established, accepted industrial use of the area. Those of relevance are set out below.

i) Nestle UK Ltd, North Hyde Gardens

- 4.10 A number of applications have been approved at the Nestle site, which is a large-scale industrial use, to the west along North Hyde Gardens. An application was approved on 26 February 2003 for the installation of pipe gantry supported by three tubed masts and four lattice towers (ref: 1331/APP/2002/2851).
- 4.11 Permission was granted for the installation of 10 new windows and 14 ventilation grilles to the south elevation of the eden building on 31 December 2007 (ref: 1331/APP/2007/3351).
- 4.12 An application was approved on 17 March 2009 for the installation of a new canopy between the main building and Eden building (ref: 1331/APP/2009/103).
- 4.13 A further application was granted consent on 30 April 2009 for an outbuilding for use as plant and equipment store (ref: 1331/APP/2009/161). Subsequently, two applications and were approved in relation to the raising of the roof height of an



existing building (ref: 1331/APP/2010/1849) and construction of a galvanised steel platform with staircase to support a de-aerator vessel (ref: 1331/APP/2010/2897).

ii) DHL Distribution Site, North Hyde Gardens

- 4.14 The DHL site is a well established distribution centre and is located immediately to the west of the application site, beyond Yeading Brook. Access to the DHL site is via the short section of North Hyde Gardens which runs between the two portions of the application site. The site is a well-established distribution centre, with many HGV movements.
- 4.15 Permission was granted on 29 September 2003 for the installation of a HGV washing facility (ref: 3226/APP/2003/1906).
- 4.16 An application (ref: 67904/APP/2011/1599) was submitted on 30 June 2011 for a 'single storey building with mezzanine floor' at the Lorry Park, DHL Distribution Site. The application is still pending consideration. The submitted application forms state the proposed hours of opening as 5.30am – 10.30pm (Monday – Friday) and 5.30am – 1.30pm (Saturday).

iii) Canal and River Trust Site

- 4.17 The Canal and River Trust owns the area of land immediately to the south-east of the application site, at the end of North Hyde Gardens, together with the Grand Union Canal and towpaths. The land is located within the Bulls Bridge Conservation Area (which is shared with the London Borough of Ealing and London Borough of Hounslow Councils) and accommodates the grade II listed Bulls Bridge.
- 4.18 An application was approved on 22 May 2002 for the erection of new sanitary station, bin store and re-opened access (involving demolition of existing pre-fabricated garage) (ref: 56943/APP/2002/22). Later in 2002, on 18 October, planning permission was granted for the rebuilding and extension of cottage no.3 together with the change of use for British Waterways' operational facility (involving demolition of cottages nos.2 and 3); erection of 6 small industrial units; erection of a two storey side and rear extension, front porch extension and change of use of existing toll house from residential to commercial; erection of new garage; and formation of new mooring car park and associated landscaping (ref: 56912/APP/2001/2691). A



number of subsequent applications for the discharge of conditions have been approved.

- 4.19 Most recently, planning permission was granted on 9 May 2012 for the erection of a large Class B2 (general industrial) workshop unit with ancillary offices and staff facilities, refurbishment of the toll house, coach and car parking and landscaping (ref: 67194/APP/2010/2992). Conservation area consent was also granted (ref: 56912/APP/2012/719) for 'demolition of entire structures of cottages 2 and 3, Grand Union Canal, Bulls Bridge'.

iv) Volvo HGV and Coach Park

- 4.20 This site is located to the south of the application site, on the southern side of North Hyde Gardens, and is a repair centre for Volvo HGVs and coaches. Planning permission was granted on 20 February 2003 for the erection of an extension to provide 3 additional servicing bays decision (ref: 53493/APP/2002/1238).
- 4.21 A further application was approved on 26 September 2006 for the erection of a 3.4 metre high security fence and gates (ref: 53493/APP/2006/2185).

v) Tarmac Site, Pump Lane

- 4.22 The Tarmac site on Pump Lane is well established and has been in operation for many years. It is located to the north-west of the application site, beyond the railway. It provides some similar facilities to the application proposals and is, therefore, directly relevant to the current proposals. There is an extensive planning history as the facility has developed and increased in size and scale over the years. The relevant applications are listed below.
- 4.23 The Council's online planning history records show that an application was approved for the erection of ground storage bays for aggregates on 13 May 1977 (ref: 19377/F/77/0213). On 28 July 1977 an application was approved for the erection of an eight foot wall (ref: 19377/G/77/0854).
- 4.24 An application was then subsequently approved for a 'Readycrete' concrete batching plant and ancillary equipment in March 1980 (ref: 19377/H/79/0690). A separate application was approved for the erection of a weighbridge, office, 2 storey offices, new lab, amenity block and stores on 11 January 1980 (ref: 19377/J/79/1694).



- 4.25 Two years later, on 27 March 1982, an application was approved for the retention of the concrete batching plant (ref: 19377/Q/82/0015). A further application was also approved in 1983 for the renewal of this permission (ref: 19377/R/83/1641).
- 4.26 An application for replacement plant, machinery and existing buildings in relation to the asphalt operations was considered permitted development on 6 September 1988 (ref: 19377/W/88/1483).
- 4.27 More recently, an application was approved on 30 April 2009 for the construction of a new concrete batching plant with associated facilities, relocation of the incoming weighbridge, construction of a new weighbridge office and minor alterations to the routing of vehicles within the site (ref: 19377/APP/2007/3089).
- 4.28 Planning permission was also granted on 30 April 2009 to facilitate the upgrading of the existing asphalt plant, by permitting the installation of plant to allow pre-heating of recycled asphalt plantings (RAP). One of the approved application drawings (ref: HAY/585/A) shows that the asphalt plant, with the proposed RAP system above, is 38 metres high (ref: 19377/APP/2008/893).
- 4.29 Following this, and most recently, an application was approved on 12 July 2010 for the installation of inclined conveyor to replace an existing vertical elevator with associated storage units (ref: 19377/APP/2010/869). Finally, on the same day, an application was approved for the relocation of the permitted concrete batching plant (ref: 19377/APP/2010/870). Further applications were approved on 21 March 2011 discharging the conditions.

vi) Moorings along Grand Union Canal, Paddington Branch

- 4.30 There is no record of any planning applications relating to the leisure moorings along the Grand Union Canal, Paddington Branch. This confirms that the moorings are only permitted to be used for leisure purposes.

vii) Southall Gas Works Site (West Southall)

- 4.31 Permission was granted for outline and full planning permission for the redevelopment of the Southall Gas Works Site on 29 September 2010 (ref: P/2008/3981-S).
- 4.32 The outline application was approved for 'demolition of 22 houses; the remediation of the land and the redevelopment of the site to deliver a large mixed use development



including residential, non-food retail, food retail, restaurants, bars and cafes, hotel, conference and banqueting, cinema, health care facilities, education facilities, office/studio units, sports pavilion, an energy centre, multi-storey car park and associated car and cycle parking, landscaping, public realm, open space and children's play space'.

- 4.33 The approved full application comprised 'new access roads from the Hayes by-pass and Southall town centre to the application site for vehicle, cycle and pedestrian access, including drainage and a flood relief pond. Widening of South Road across the railway line, for the creation of a bus lane and three new accesses onto Beaconsfield Road. Two bridges over the Grand Union Canal and Yeading Brook to provide pedestrian and cycle access to the Minet Country Park and Springfield Road'. This permission has not been implemented.



SECTION 5: APPLICATION PROPOSALS

a) Proposed Development Scope

- 5.1 The development proposals are for the construction and operation of an Aggregate Recycling Plant; Asphalt Storage and Production Plant; Gully Waste Recycling Plant; together with associated ancillary structures and facilities, car and HGV parking, regrading and landscaping.
- 5.2 The redevelopment proposals provide for:
- clearance and spreading of the existing bund material across the Site (as outlined in the Proposed Development's Land Contamination Strategy Report); capping of the Site with concrete and/or asphalt as appropriate for circulation and parking;
 - construction of administration offices;
 - construction of an Aggregate Recycling Plant;
 - construction of a Gully Waste Recycling Plant;
 - construction of an Asphalt Production Plant; and
 - implementation of landscaping.
- 5.3 Upon completion the Aggregate Recycling Plant will have a maximum process and recycle capacity of approximately 300,000 tonnes per annum (tpa) of waste material extracted from pavements that will otherwise have been landfilled. Some of this material will be used within the Asphalt Production Plant which will at completion, have a production capacity of 300,000 tpa. In addition, the Gully Waste Recycling Plant, will accept material from road sweepers and gully suckers (that will otherwise have been sent to landfill) to recycle up to 20,000 tpa. The recycled water and the recovered solid materials from this process will be redirected back into the Aggregate Recycling Plant.
- 5.4 The Proposed Development's key objective will be to recycle all the waste materials that arise from the delivery of the Applicant's wide ranging services. These include asphalt; road and pavement sub base, paving, concrete and wet wastes such as gully waste and road sweepings.



- 5.5 The Proposed Development will also serve as an operating centre for the Applicant's Term Maintenance Division by providing parking for vehicles and storage for equipment and materials.

b) Proposed Development Layout

- 5.6 The layout of the Proposed Development is shown on the application drawings. This has been informed by a number of limitations, considerations and requirements, including:

- the constrained area of the Site, especially following the set back of the eastern Site boundary to safeguard existing woodland trees immediately to the east of the Site;
- environmental issues including the location of sensitive receptors, the visibility of the Site, the setting of the Site; the past uses at the Site;
- the Applicant's operational experience based on their existing facilities at Dartford and Erith;
- site logistical arrangements including internal circulation and swept path analyses; and
- design criteria, including the desire to ensure uniformity in building presentation and to 'contain' industrial features to least visible areas of the Site.

- 5.8 Following the re-spreading of the existing bund material across the Site, together with the capping layers on top, the current site levels are likely to be raised by up to a maximum of 1.2 m. These materials will be retained by means of a 1.2 m high retaining wall along the entire site perimeter. The following boundary treatment will be implemented on top of this retaining wall:

- north-west: 2.4 m palisade fence;
- north-east :6 m acoustic boundary wall;
- east: 7 m acoustic boundary wall;
- south-east: 3-5 m acoustic boundary wall with 1.2 m high landscaping planters;
- south: 2 m acoustic boundary wall with 1.2 m high landscaping planters; and
- west: 2.4 m palisade fence.

- 5.9 In all instances the walls, and their respective heights, will be provided for acoustic attenuation purposes.



5.10 Road access will be provided from two points along the existing road - one access point to the main facility and one access point to the staff car parking located beneath the A312 Parkway.

5.11 The development layout will comprise the following:

Northern and North-Eastern Site Area:

- Aggregate Recycling Plant including Washing Plant and Inbound Material Stockpile up to 5 m high
- Low level cement silo
- Water storage tank
- Staff welfare and storage facilities

Eastern Site Area:

- Inbound storage bays
- Covered aggregate storage bays
- Site storage and/or parking (comprising hardstanding areas, enclosed as necessary)
- Water storage tank

Southern Site Area:

- Asphalt Plant
- Asphalt HGV tracking lanes and parking space
- Site storage

Western Site Area:

- Landscaped car park with 70 car parking spaces, five cycle and five motorcycle spaces
- Staff welfare facilities
- Office building and visitor car parking spaces
- Term Maintenance Yard (enclosed as necessary) and fuel storage areas
- Main site entrance point with entry and exit roads, incorporating weighbridges, on either side of the weighbridge office including the plant control room
- Gully Waste Recycling Plant
- Concrete washout bay



- Water storage tank
- Diesel fuel tank with 60,000 litre capacity and bunded containment of 110%.

Central Site Area:

- Hardstanding and circulation routes
- Drive-through wheel wash

c) Proposed Development Components and Processes

5.12 This section discusses in more detail the component parts and processes of the Proposed Development, as well as ancillary components.

i) Aggregate Recycling Plant

Component Parts

5.13 The Aggregate Recycling Plant will comprise a processing plant, screens, washing plant, hoppers, conveyors, fines treatment equipment, control cabins, inbound storage bays (of block wall or sleeper construction) and other ancillary plant, equipment and structures.

5.14 The processing plant will be fully housed/ enclosed as necessary to accord with the Proposed Development's noise and vibration impact assessment. Dry product conveyors will be enclosed whilst wet product conveyors will be open; dust suppression will be fitted as appropriate (water sprays).

5.15 Recovered materials delivered to the Site for recycling will be from the Applicant's existing contracts and will be stored in the inbound storage bays. Materials will typically include the following:

- road and pavement infrastructure materials including asphalt, sub-base, concrete, kerbs, slabs and drainage media (all inert);
- construction and demolition waste – inert only;
- road planings;
- waste asphalt;
- waste concrete;
- solid materials recovered from Gully Waste Recycling Plant; and
- primary aggregate for blending with recycled products.



5.16 The combined volume of the above components will reach up to 300,000 tpa.

Processes

5.17 The processing of material will be carried out through any combination of processing, re-grading, screening, washing, blending or simply re-handling. The process can be summarised as follows:

- Recovered materials will be delivered to Site in HGVs and unloaded into the inbound storage bays or stockpile in the north-eastern corner of the Site, not to exceed 5 m in height. Potential dust from these stock piles would be attenuated by means of perimeter installed dust suppression sprays.
- The processing plant will be fed material by a hydraulic excavator.
- All Materials will initially pass through the enclosed processing plant and be screened to produce either 0-25 mm product or 0-45 mm material stream. Both these activities will take place within high performance noise attenuation.
- The 0-25 mm material will be further washed and screened by transporting the material, via a semi covered conveyor, directly to the washing plant with a high pressure washing system. The material will be screened to 0-4 mm, producing recovered 4 mm sand and 4-20 mm recovered stone. These products will then be blended to produce fully recycled ballast. The recycled ballast is the principal raw material used by the Applicant's fleet of volumetric concrete mixers. The recycled ballast, together with cement, water and any required additives are mixed at the delivery point to produce fresh concrete. Only the exact quantity of concrete required is therefore mixed to avoid any wastage via the volumetric concrete mixers.
- The processing and washing plant are designed to allow for different size products to be produced including drainage media. The 0-45 mm material will be used for Type 1 sub base, and sold to the Applicant's own contracts or any third party customers. Stockpiles of recycled aggregates will not exceed 6 m in height and will be regularly dampened down to ensure that dust and visual impacts are minimised.

5.18 A loading shovel will be used for moving materials and loading lorries.



5.19 The above processes will produce the following products:

- sub-bases;
- capping materials;
- Type 1;
- Type 4;
- drainage media;
- graded aggregate;
- sand;
- ballast; and
- recycled asphalt products (('RAP') a screened blend of road planings) and waste asphalt.

5.20 These products will be re-used on-site or loaded for off-site sale or re-use. Any unusable arisings, including fines and filter cake from the washing process, that cannot be re-used will be disposed of off-site. Any scrap metal, wood, plastic or litter will be separated as part of the process and recycled as appropriate. This would be less than 2% of all inbound material.

5.21 The above processes will be subject to the conditions of any waste management license as appropriate, issued by the Environment Agency, as is the case with the Applicant's existing Dartford Facility.

Operating Hours

5.22 The Aggregate Recycling Plant will operate as follows:

Plant Activity	Weekday Operating Hours	Weekend Operating Hours
Inbound material delivery	24/7, although principally from 07.00-18.00	24/7, although principally from 07.00 - 14.00
Aggregate processing and washing	07.00-18.00	07.00-14.00 Saturday
Loading out of recycled materials for off-site sale or collection by customers	06.00-18.00	06.00-14.00 Saturday



ii) Asphalt Production Plant

Component Parts

- 5.23 The Asphalt Plant will comprise the production unit, an asphalt hot storage facility (with six 80 tonne capacity bins), twelve covered aggregate storage bays and ancillary plant, equipment and structures, including three sea-container style units for the storage of spare parts and equipment.
- 5.24 It will have a rated capacity of 160 tpa incorporating a parallel dryer drum for the use of hot RAP, which will significantly increase the proportion of RAP that can be used in different product mixes.
- 5.25 The hot storage facility would be fed by an enclosed conveyor from a ground level unloading facility. These component parts will all be fully contained and clad.
- 5.26 The fleet of vehicles serving the Asphalt Plant will be parked in the south-western corner of the Site. All vehicles would be fitted with air brake silencers, rubber tailgate buffers and white-noise proximity beepers (as per the loading shovel).

Processes

- 5.27 The Asphalt Plant will manufacture coated road-stone (asphalt) from a mix of primary and secondary aggregates, as well as RAP which will be combined with bitumen and fillers depending upon the required asphalt mix. RAP will be sourced from the adjoining Aggregate Recycling Plant, and could in some instances comprise 70% of product mixes. At full capacity, maximum output will be up to 300,000 tpa.
- 5.28 The process comprises five main stages:-

1) Site Storage of Raw Materials

- 5.29 The majority of aggregates, sand, fillers, bitumen, fuel and various additives necessary for production of asphalt will be brought to Site by sheeted HGVs. Bitumen will be delivered to the Site by delivery tanker and will be drawn directly from the delivery tanker into one of five dedicated bitumen tanks (located within the Asphalt Production Plant) to minimise any risk of spillages.
- 5.30 On-site storage arrangements will be as follows:
- Aggregates, sand and RAP will be stored in 12 box profile clad and covered storage bays each capable of holding up to 1,200 tonnes, of material. Reclaimed



and imported fillers including hydrated lime will be stored within three sealed silos located inside the main enclosure of the Asphalt Plant;

- Pigment will be stored within the main plant enclosure in a small 3m³ hopper with closable lid;
- Bitumen will be stored within five electrically heated vertical tanks, three will hold 80 m³ and the fourth will be split into 2 x 40 m³ held at approximately 160 °C;
- Emulsion will be stored in a 30,000 litre heated tank holding the emulsion at approximately 80 °C. All binder tanks will comply with the Refined Bitumen Association (RBA) safe storage regulations.
- Fuel oil will be stored within a 80,000 litre tank within the main plant enclosure with bunded containment of 110%.
- Diesel fuel will be stored in a 60,000 litre tank with bunded containment of 110%.

2) Aggregate Feed and Proportioning

- 5.31 Aggregates and sands will be fed independently via a wheeled loading shovel from the storage bays into one of the thirteen three sided and roofed 14 m³ capacity “cold feed” steel storage hoppers; each providing a variable feed onto the transfer conveyor belts feeding the rotary dryer drum. RAP will be similarly fed by loading shovel into the plant but will proceed via an inclined slinger conveyor and elevator to the parallel dryer drum. The walls of the hoppers will be insulated and heated to keep the material at the required temperature.

3) Heating and Drying

- 5.32 During the production process, the bitumen will be heated by a “high efficiency” automated system. Binder heating will be controlled using a P100 sensor with electric temperature regulator and analogue output for remote readouts. Additional safety thermostats will be installed to monitor the products.
- 5.33 The aggregate will be dried and heated in a sealed steel contra flow rotary dryer which will be 10 m in length by 2.8 m in diameter. This step is required to ensure the aggregate is free from moisture prior to mixing with bitumen and filler. The dryer has a 23,720 kW burner which will be fired on gas oil. Water vapour and exhaust air will pass through the bag filtration plant to be discharged via a 30 m stack and trapped particulates fed back as filler into the process.
- 5.34 A second parallel flow drum dryer, will receive and dry the RAP via a recycle elevator.



4) Screening, Weighing and Mixing

- 5.35 Heated and dried aggregates discharged from the dryer will be passed via a bucket elevator to the top of the mixing tower to the vibrating screen deck and separated by size, in terms of the recipe mix required and pass into six hot stone bins. The required proportions of aggregate and RAP will be mixed with the bitumen and fillers and transferred to the paddle mixer. The plant will be able to mix up to 3 tonnes per batch. The mixing time is typically no more than 45 seconds per batch.

5) Mixed Material Storage

- 5.36 The final asphalt product will either be directly loaded out into a waiting HGV below or stored in one of six 80 tonne capacity electrically heated mixed material storage hoppers. From these the asphalt is directly discharged via overhead doors into an insulated HGV for final dispatch from the plant. HGVs tippers will drive under the plant to a pre-notified hopper. The hopper would then discharge the required amount into the tipping body of the vehicle. The operation is controlled by computer via the plant control room, which will be located in the weighbridge office. All asphalt carrying HGVs will leave the Site sheeted.
- 5.37 Asphalt can be stored in the hot storage bins for up to twelve hours but this depends upon a number of factors including the amount and individual product mix. Any asphalt unused or, returned from site will be recycled on-site at the Aggregate Recycling Plant

Processes

- 5.38 The Asphalt Plant will be subject to the conditions of a Local Authority Pollution Prevention Control (LAPPC) Permit, issued by LBH. In the case of the Applicant's existing Erith Facility it was the London Borough of Bexley.
- 5.39 The Permit will control all aspects of the operation through a series of enforceable conditions that will specify the acceptable levels of any emission including smoke, moisture, odour or airborne dust. Any breach of these conditions could potentially lead to revocation of the Permit by the Local Authority.



Operating Hours

- 5.40 The Asphalt Plant will operate on a 24/7 basis to meet the needs of service contracts with different London Boroughs and other public and private sector clients.

iii) Gully Waste Recycling Plant

Component Parts

- 5.41 The Gully Waste Recycling Plant comprises a shallow sloping concrete pad (10 x 24 m), filters and two below ground tanks for the treatment and recycling of gully sucker waste and road sweeper waste arising from street cleansing activities. At maximum output, up to 20,000 tpa of waste will be treated and recycled.

Processes

- 5.42 Gully waste treatment is a passive process. As the gully sucker tips up, water will drain through a series of filters, whilst trapping any hydrocarbons, and recovering any solid residue. These residues will be moved from the plant by loading shovel or hydraulic excavator, and processed at the Aggregate Recycling Plant. All water used in the process, will be re-circulated and used again (either by gully suckers or elsewhere on-site).
- 5.43 Any residue that cannot be recycled will be collected and disposed of off-site.
- 5.44 The above process will be subject to the conditions of any waste management license as appropriate, issued by the Environment Agency.

Operating Hours

- 5.45 There will be a requirement for 24/7 availability; however, the gully suckers typically only operate between 06.00-18.00 Monday to Friday and 06.00-14.00 on Saturday.

iv) Cement Silo

- 5.46 The low level cement silo will comprise a 100 tonne capacity, prefabricated steel constructed silo. Cement from the silo will be taken by the Applicant's fleet of volumetric concrete mixer trucks as required, to facilitate the mixing of concrete at the point of use. No concrete will be produced on-site. The operation and maintenance of the cement silo will be governed by the terms of an LAPPC issued by LBH.



v) Concrete Washout Bay

5.47 The proposed Concrete Washout Bay, or settlement bay, will be used to wash down volumetric concrete mixers at the end of each working day. Through a system of weirs, the water will be recycled for re-use and residues will be removed for re-processing in the Aggregate Recycling Plant. The use of the Concrete Washout Bay will be subject to the conditions of a LAPPC Permit or Discharge Licence as may be deemed appropriate, by the Local Authority or Environment Agency.

vi) Term Maintenance Yard

5.48 The Term Maintenance Yard will comprise the following:

- Open storage of plant, equipment and materials such as paving slabs, setts, lighting, street furniture etc.;
- Low-level enclosed storage of plant equipment and material items such as power tools, PPE, high value items and items requiring inside storage;
- Vehicle parking; and
- Security fencing.

vii) Welfare Facilities

5.49 Up to six Portacabin style units will be provided along the perimeter of the Site to provide changing, washing, toilet, drying and seating areas.

viii) Office Buildings

5.50 Two buildings will be provided on-site:

- Two storey weighbridge office from where site access and plant control will take place.
- Three storey administrative office that will provide for general site and contract management and control.

ix) Ancillary Components

5.51 The following ancillary components will be provided within the Proposed Development:

- Service supply cabins/buildings including brick constructed substations;



- Two surface mounted 50 tonne capacity weighbridges (15 x 3 m) located on either side of the Weighbridge Office;
- Up to 70 car parking spaces for employees/visitors beneath the A312 Parkway flyover;
- Up to 50 HGV parking spaces;
- Fuel storage tanks;
- Up to four water tanks, each with 60,000 litre capacity;
- Recycling skips and waste bins;
- CCTV;
- Site lighting (in accordance with lighting strategy to be developed post consent); and
- Landscaping.

d) Proposed Development Appearance

i) Massing and Scale

5.52 The scale and massing of proposed buildings and structures are dictated by standard plant and process requirements, although a reduction in the height of the Asphalt Plant has been achieved during the design process by separating the proposed storage facility from the main production plant. This will limit visual impact considerably and is discussed further below, and in the accompanying reports.

5.53 The principal elements of the proposal will range from 7.55 to 27.8m as summarised in the table below:



Plant Component	Height above Finished Site Level
Aggregate Recycling Plant	9.5 and 10.4 m
Asphalt Plant	27.8 m
Asphalt Stack	30.0 m
Asphalt Storage Facility	20.0m
Aggregate Storage Bays	9.5 m
Office Buildings	Weighbridge Office 7.55m Admin Office 11.4m
Cement Silo	6 m
Welfare Facilities	Single storey 3m, stacked two storey 6 m
Water Storage Tanks	Up to 6 m and 4 m diameter
Acoustic Boundary Treatment	Up to 7 m

ii) Materials and Finishes

- 5.54 Foundations will comprise standard spread foundations and where necessary Continuous Auger Piling (CFA) piling, which is recognised as a quiet and vibration free method of construction.
- 5.55 Buildings will be steel frame constructed with holorib decking and concrete structural floors. Exterior finishes will be similar to that adopted at the Applicant's Erith and Dartford Facilities and therefore will comprise:
- proprietary metal composite roof panels with an approximate 5 degree duo pitch;
 - non-combustible metal profiled panel system cladding, finished with a coloured PVC coating; and
 - ventilation louvres at various external locations, which will be finished with a coloured polyester powder coating or standard paint finish.
- 5.56 The colour coding of the building elevations will comprise goose wing grey and Conway green. The same coding would be applied to welfare facilities and storage containers.
- 5.57 Process Plant will be fully enclosed and will comply with the noise limits prescribed in the Proposed Development's Noise and Vibration Impact Assessment.



iii) Landscaping and Biodiversity Enhancements

5.58 Landscaping and biodiversity enhancement proposals will comprise the following:

- a 1 m wide strip of ivy planting along the northern Site boundary;
- a 1m wide strip of ivy planting along the eastern Site boundary, in addition to approximately 4 m of native woodland understorey shrub, ground layer planting and twining plants (on the existing chain link fence);
- two new semi mature maple trees along the eastern Site boundary to complete the existing row;
- 5 m wide terrace planting on the south-eastern Site boundary with native thicket planting and specimen trees;
- 2m wide planting on the southern and south-western Site boundary with native thicket planting and specimen trees;
- native thicket planting in the car parking area, as well as the western boundary along the Yeading Brook with ground cover planting and occasional trees, space permitting;
- living roofs (brown roofs) on the two aggregate storage bay;
- timber cladding to the perimeter acoustic wall where appropriate; and
- bird and bat boxes within the existing woodland.

5.59 In total an area of approximately 3,000 m² will be landscaped, whilst up to 1,200 m² will be provided as living (brown) roofs. This is considered further in the accompanying reports.



SECTION 6: NATIONAL PLANNING POLICY

a) National Planning Policy Framework (NPPF) March 2012

- 6.1 The NPPF was adopted in March 2012 and sets out the Government's planning policies for England and supersedes the Government's Planning Policy Statements and Guidance documents.
- 6.2 The NPPF sets out the Core Planning Principles which should underpin both plan-making and decision-taking. This includes proactively driving and supporting sustainable economic development and supporting the transition to a low carbon future, and encouraging the reuse of existing resources. The Government also encourages the effective use of land by utilising brownfield land.
- 6.3 The application proposals are a key example of sustainable economic development and will work towards the Government's aims for a low carbon future by utilising land which is currently vacant.
- 6.4 With regard to delivering sustainable development, paragraph 21 states that investment in business should not be over burdened by the combined requirements of planning policy expectations. In addition, paragraph 22 goes on to state that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.
- 6.5 Chapter 4 on promoting sustainable transport states that encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. Paragraph 32 sets out that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.
- 6.6 It will be demonstrated within the supporting Transport Impact Assessment that the proposals fully accord with the Government's sustainable transport objectives and the proposals will not have a significant detrimental impact on the highway network.
- 6.7 With regard to good design, paragraph 65 states:

“Local Planning Authorities should not refuse planning permission for buildings or infrastructure which promote high levels of



sustainability because of concerns about compatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits)".

- 6.8 The proposals promote high levels of sustainability and the design of all plant, including the asphalt plant, has been carefully considered with great consideration given to the surrounding context of the site. This is addressed further in Section 9, as well as in the accompanying Townscape and Visual Impact Assessment prepared by Environ. It is our conclusion, however, that the proposals will not have a detrimental impact on the heritage assets, or the wider area, and that the proposal is wholly in character with the industrial heritage and current uses in the area.
- 6.9 Chapter 10, *Meeting the challenge of climate change, flooding and coastal change*, sets out that in order to support the move to a low carbon future, local planning authorities should plan for new development in locations and ways which will reduce greenhouse gas emissions. Paragraph 97 states that local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources.
- 6.10 The proposals will allow a maximum capacity of 300,000 tonnes of inert road and pavement infrastructure material (arising exclusively from FM Conway controlled works) to be recycled per annum, which could otherwise be sent to landfill as waste material. The material will then be transformed into a valuable resource suitable for reuse. It is therefore widely supported by the policy guidance.
- 6.11 With specific regard to flooding, paragraph 100 states that inappropriate development in areas at risk from flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.
- 6.12 Paragraph 103 goes on to say that when determining planning applications, local planning authorities should only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exception Test, it can be demonstrated that:



- **“within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and**
 - **development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems”.**
- 6.13 Issues relating to flood risk, and how this, together with site drainage, will be managed, are dealt with in detail in the accompanying Flood Risk Assessment.
- 6.14 Paragraph 111 states that planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.
- 6.15 The application proposal is, therefore, strongly supported, by Paragraph 111. Indeed the application site is a vacant brownfield site, possessing little, if any, environmental value. The former uses of the site have rendered the site contaminated and the proposal provides an opportunity to bring this derelict piece of land back into active use.
- 6.16 In terms of noise generation, paragraph 123 outlines that planning policies and decision should aim to:
- **“avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;**
 - **mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions;**
 - **recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established; and**
 - **identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason”.**



- 6.17 The potential for impact on existing amenity has been a primary consideration during the design stage of the application and a number of measures have been taken to ensure that the amenity of the surrounding area is protected. There are no residential properties immediately surrounding the application site - indeed the nearest residential receptor is some 400 metres away - however, the final layout of the proposal ensures that the part of the development which has the potential to generate the most noise, namely the aggregate recycling and processing plant, is located furthest away from the site boundary and noise sensitive properties. The aggregate recycling plant will be fully enclosed in acoustically designed cladding to ensure that noise levels are minimised.
- 6.18 Chapter 12 of the NPPF, on conserving and enhancing the historic environment, states that local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposals on their significance.
- 6.19 Paragraph 131 goes on to say that in determining planning applications, local planning authorities should take account of:
- **“the desirability of sustaining and enhancing the significance of heritage assets and pitting them to viable uses consistent with their conservation;**
 - **the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and**
 - **the desirability of new development making a positive contribution to local character and distinctiveness”.**
- 6.20 Paragraph 134 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposals, including securing its optimum viable use. Paragraph 137 further sets out that local planning authorities should look for opportunities for new development within Conservation Areas to enhance or better reveal their significance. Proposals that preserve those elements



of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

- 6.21 The supporting Heritage Statement reviews the surrounding designated heritage assets in relation to the application site and the development proposals. This concludes that because the proposals seek to bring a vacant brownfield site back into use, which has a history of heavy industrial uses (together with the surrounding area), the heritage assets are preserved and indeed, to a degree, enhanced by the reuse of land in the way it was historically intended.
- 6.22 Chapter 13 targets the sustainable use of minerals, and sets out that in preparing local plans, local planning authorities should safeguard existing, planned and potential sites for the handling, processing and distribution of substitute, recycled and secondary aggregate material.
- 6.23 It is clear that the proposals are in line with the Government's vision for the safeguarding of land for sustainable reuse and recycling of aggregate materials. Indeed it is clear, that the wider principles of the NPPF, which seeks to encourage sustainable, brownfield development, which reuses and manages existing resources are fully aligned with the application proposal. Of course, there is an obligation to ensure that these benefits are considered against the environmental impacts of the proposal, including the impact on existing heritage assets. However, we are confident that this will be successfully demonstrated in the accompanying assessments, to the satisfaction of the Local Authority.

b) Technical Guidance to the National Planning Policy Framework (March 2012)

- 6.24 The Technical Guidance was published at the same time as the National Planning Policy Framework and provides guidance on minerals, with specific reference to issues relating to dust and noise emissions, as well as guidance on flood risk assessment. These issues are considered within the accompanying technical reports submitted with the application.

c) The Future of Transport (2004)

- 6.25 Paragraph 8.2 on freight states that the Government's key aims for the freight industry are to facilitate the continuing development of a competitive and efficient



freight sector, while reducing the impact that moving freight has on congestion and the environment.

6.26 The document sets out the Government's strategy to achieve more sustainable distribution of goods, which, *inter alia*, comprises the following elements

- **“Access to infrastructure – improving journey reliability will help freight transport as well as private motorists.**
- **Local and regional regulation – the Government will encourage local authorities to consider how their various regulatory powers that relate to freight transport (traffic and parking regulations, night-time bans, planning powers and the use of planning conditions) can be co-ordinated to make life easier for businesses while protecting the interests of local people. Freight policy also needs to be considered by regional bodies and we will encourage them to think strategically about freight, especially in the context of regional strategies on transport, housing and spatial development.**
- **Modal-shift programmes – rail and water. The Government will continue to encourage freight traffic to be shifted from road to rail or water where this makes sense, and where appropriate will offer financial support”.**

6.27 This is considered further in the accompanying Transport Impact Assessment.

d) **Planning Policy Statement 10 (PPS10) – Planning for Sustainable Waste Management (Revised March 2011)**

6.28 Paragraph 1 of PPS10 confirms that the overall objective of Government policy on waste is to protect human health and the environment, by producing less waste and by using it as a resource wherever possible. Through more sustainable waste management, moving the management of waste up the ‘waste hierarchy’ (reduction, reuse, recycling and composting, using waste as a source of energy, and only disposing as a last resort), the Government aims to break the link between economic growth and the environmental impact of waste. This involves a step change in the way waste is handled and significant new investment in waste management facilities. The Government sees that the planning system is pivotal to the provision of new facilities that will be needed to fulfill this aim.

6.29 This does, therefore, offer strong support for the proposals, which fully align with this guidance, as the proposed facility would process up to 300,000 tonnes per annum of



inert road and pavement infrastructure material, which is likely to otherwise be sent to landfill.



SECTION 7: STRATEGIC PLANNING POLICY

7.1 There are a number of strategic policy documents which need to be considered, and these are detailed below. For ease of reference, consideration of specific technical policy documents, such as guidance on transport, energy, biodiversity, noise and air quality, is provided in the accompanying assessments only.

a) The London Plan (Adopted 2011)

7.2 The London Plan was adopted in July 2011 and comprises the new spatial development strategy for London for the next 20-25 years. Local development plans must be in general conformity with its content.

7.3 Policy 7.2 targets economic development in outer London, stating that boroughs and other stakeholders should seek to address constraints and opportunities in the economic growth of outer London by managing and improving the stock of industrial capacity to meet both strategic and local needs.

7.4 Policy 4.4 states

“LDFs should demonstrate how the borough stock of industrial land and premises in strategic industrial locations (Policy 2.17), locally significant industrial sites and other industrial sites will be planned and managed in local circumstances in line with this strategic policy and the location strategy in Chapter 2, taking account of:

- **the need to identify and protect locally significant industrial sites where justified by evidence of demand;**
- **strategic and local criteria to manage these and other industrial sites;**
- **the borough level groupings for transfer of industrial land to other uses (see Map 4.1) and strategic monitoring benchmarks for industrial land release in supplementary planning guidance;**
- **the need for strategic and local provision for waste management, transport facilities (including inter-modal freight interchanges), logistics and wholesale markets within London and the wider city region; and to accommodate demand for workspace for small and medium sized enterprises and for**



new and emerging industrial sectors including the need to identify sufficient capacity for renewable energy generation;

- **quality and fitness for purpose of sites;**
- **accessibility to the strategic road network and potential for transport of goods by rail and/or water transport;**
- **accessibility to the local workforce by public transport, walking and cycling;**
- **integrated strategic and local assessments of industrial demand to justify retention and inform release of industrial capacity in order to achieve efficient use of land;**
- **the potential for surplus industrial land to help meet strategic and local requirements for a mix of other uses such as housing and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal”.**

7.5 The application site falls within the Hayes Industrial Estate Preferred Industrial Location (PIL), and this designation is reflected in the Local Planning Policies (detailed in the following section). The site is therefore protected for industrial / commercial uses, in line with the application proposals. Furthermore, it has already been set out that there is a strong market need for FM Conway to develop a facility in the western sub-region of London, thus ensuring there is a viable and active future use for the site. This demand for development of the site, combined with the other strategic and localised benefits which will arise from the proposals, including the use of previously developed land, means the application proposals fully adhere with the thrust of Policy 4.4.

7.6 With regard to sustainable design principles, Policy 5.3 sets out that developments should adopt the following sustainable design principles:

- **“minimise carbon dioxide emissions across the site, including the building and services (such as heating and cooling systems)**
- **avoiding internal overheating and contributing to the urban heat island effect**



- **efficient use of natural resources (including water), including making the most of natural systems both within and around buildings**
- **minimising pollution (including noise, air and urban run-off)**
- **minimising the generation of waste and maximising reuse or recycling**
- **avoiding impacts from natural hazards including flooding**
- **ensuring developments are comfortable and secure for users, including avoiding the creation of adverse local climatic conditions**
- **securing sustainable procurement of materials, using local supplies where feasible, and**
- **promoting and protecting biodiversity and green infrastructure”.**

7.7 Sustainable design has been a key consideration in the evolution of the application proposals. Indeed, the whole purpose of the development is to increase sustainability and reduce waste, both in terms of energy and materials.

7.8 Regarding energy consumption, Policy 5.2 states:

“Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

- 1 Be lean: use less energy**
- 2 Be clean: supply energy efficiently**
- 3 Be green: use renewable energy**

The Mayor will work with boroughs and developers to ensure that major developments meet the following targets for carbon dioxide emissions reduction in buildings. These targets are expressed as minimum improvements over the Target Emission Rate (TER) outlined in the national Building Regulations leading to zero carbon residential buildings from 2016 and zero carbon non-domestic buildings from 2019.



Major development proposals should include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction outlined above are to be met within the framework of the energy hierarchy”.

7.9 Paragraph 5.42 goes on stating:

“Individual development proposals will also help to achieve these targets by applying the energy hierarchy in Policy 5.2. There is a presumption that all major development proposals will seek to reduce carbon dioxide emissions by at least 20 per cent through the use of on-site renewable energy generation wherever feasible. Development proposals should seek to utilise renewable energy technologies such as: biomass heating; cooling and electricity; renewable energy from waste; photovoltaics; solar water heating; wind and heat pumps.”

- 7.10 Accordingly, a detailed Energy Strategy is provided with the application and this considers the implications of this policy requirement.
- 7.11 Policy 5.12 on flood risk management sets out that development must comply with the flood risk assessment requirements set out in PPS25. The NPPF now replaces PPS25. However, the principles of flood risk management are discussed within the Flood Risk Assessment submitted with the application.
- 7.12 Policy 5.13 targets sustainable drainage, setting out that development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. The Drainage Strategy submitted with the application discusses the drainage for the proposals, although it is an important consideration that significant amounts of water from around the site will be collected, stored and reused in the various proposed processes.
- 7.13 With regard to waste self-sufficiency, Policy 5.16 sets out that the Council aims to exceed recycling/composting levels in commercial and industrial waste of 70 per cent by 2020 and exceed recycling and reuse levels in construction, excavation and demolition (CE&D) waste of 95 per cent by 2020.



7.14 In line with this, Policy 5.17 on waste capacity supports developments for manufacturing related to recycled waste, and the policy states that proposals for waste management should be evaluated against the following criteria:

- a) **“locational suitability (see LDF preparation paragraphs F and G below)**
- b) **proximity to the source of waste**
- c) **the nature of activity proposed and its scale**
- d) **a positive carbon outcome of waste treatment methods and technologies (including the transportation of waste, recyclates and waste derived products) resulting in greenhouse gas savings, particularly from treatment of waste derived products to generate energy**
- e) **the environmental impact on surrounding areas, particularly noise emissions, odour and visual impact and impact on water resources**
- f) **the full transport and environmental impact of all collection, transfer and disposal movements and, in particular, the scope to maximise the use of rail and water transport using the Blue Ribbon Network”.**

7.15 The proposals fully accord with the Mayor’s aspirations for significantly increasing recycling quantities by 2020. The facility will be supplied by material generated by FM Conway works only, of which the majority is on behalf of London Boroughs. This principle, which reuses material, which otherwise would become a waste product, most likely in landfill, is wholly supported by the policies within the London Plan. In line with the criteria of the policy, all essential assessments have been prepared and submitted with the application to demonstrate that there will not be a significant adverse environmental impact.

7.16 Policy 5.18 further asserts that new construction, excavation and demolition (CE&D) waste management facilities should be encouraged at existing waste sites and supported. The Policy also states that waste should be removed from construction sites, and materials brought to the site, by water or rail transport wherever that is practicable.



- 7.17 Whilst the policy does not explicitly target the creation of new facilities for the management and processing of construction material, the emphasis is to reduce waste, recycle and reuse materials wherever possible. The proposals therefore accord with the broad aims of the policy.
- 7.18 With regards to access, it is acknowledged within the supporting Transport Impact Assessment that the application site is only accessible by North Hyde Gardens. However, the assessment also demonstrates that the impact from the proposed vehicle movements will be minimal. It is also noteworthy that the applicant is continuing to explore whether use of the adjacent canal is feasible. Whilst not part of this application, it is something being considered for potential in the future.
- 7.19 With regards to the supply of aggregates, Policy 5.20 provides guidance, stating that the Mayor will work with all relevant partners to ensure there is an adequate supply of aggregates to support construction in London. The policy states that this will be achieved by:
- 1) **“encouraging re-use and recycling of construction, demolition and excavation waste within London;**
 - 2) **extraction of land-won aggregates within London;**
 - 3) **importing aggregates to London by sustainable transport modes”.**
- 7.20 The policy goes on to state that in order to reduce the environmental impact of aggregates, Council's LDFs should:
- a) **“ensure that appropriate use is made of planning conditions dealing with aftercare, restoration and re-use of minerals sites following extraction;**
 - b) **safeguard wharves and/or railheads with existing or potential capacity for aggregate distribution;**
 - c) **minimise the movement of aggregates by road and maximise the movement of aggregates via the Blue Ribbon Network;**
 - d) **develop policies that support the protection and enhancement of aggregates recycling facilities”.**



7.21 Paragraph 5.91 confirms the Mayor's support for the Government's objective of achieving an essential level of aggregates supply in the most sustainable fashion. Paragraph 5.94 goes on to add that as aggregates are bulky materials, policies should maximise their use and minimise their movement, especially by road.

7.22 Supporting paragraph 5.94 continues, stating,

“Sites for depots may be particularly appropriate in preferred industrial locations and other employment areas”.

7.23 The application proposals fully accord with the London Plan's policies in this regard, resulting in the recycling of 300,000 tonnes per annum of material, which otherwise is likely to be disposed of, as waste. Furthermore, the processing of this material means a new valuable resource is created in the form of sub-base material and secondary aggregate, which can in turn be used in a variety of construction and maintenance works. The site's location, within a preferred industrial / employment area, is also noted as being 'particularly appropriate' for the nature of the proposals.

7.24 With regard to the transport network Policy 6.3 sets out that development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. Development should not adversely affect safety on the transport network.

7.25 In terms of freight movements, part of Policy 6.14 states:

“Development proposals that:

- **locate developments that generate high levels of freight movements close to major transport routes**
- **promote the uptake of the Freight Operators Recognition Scheme, construction logistics plans and delivery and servicing plans. These should be secured in line with the London Freight Plan and should be co-ordinated with travel plans and the development of approaches to consolidate freight**
- **increase the use of the Blue Ribbon Network for freight transport will be encouraged”.**



- 7.26 Policy 6.1 sets out the Mayor's strategic approach towards integrating transport and development and aims to encourage this in a number of ways, which includes, facilitating the efficient distribution of freight whilst minimising its impacts on the transport network.
- 7.27 Paragraph 6.41 supports Policy 6.12 on road network capacity, and sets out that the Mayor is committed to encouraging freight journeys to shift to rail and water in order to reduce pressure on the highway network. The paragraph goes on to state that there will, however, continue to be a need for some journeys to be undertaken by commercial vehicles.
- 7.28 The policy goes on to state that, *inter alia*, Local Authorities should locate developments that generate high numbers of freight movements close to major transport routes.
- 7.29 The site is located within close proximity to a number of major transport routes and the proposed movements would not significantly impact on either the local or strategic road network. Indeed, one of the key benefits of the proposal is to minimise long-distance cross-London movements from the applicant's existing south-east London facilities.
- 7.30 A further consideration is the impact of the proposals on the adjacent Bulls Bridge Conservation Area, which follows the route of the Grand Union Canal, Paddington Branch beyond the eastern boundary of the site. Policy 7.8 on heritage assets sets out that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- 7.31 The accompanying Heritage Statement provides further detail on the likely impact of the proposals on the surrounding heritage assets. This concludes that the proposals are wholly appropriate for the application site and that there is not a significant impact on the nearby heritage assets. The rich industrial heritage of the area, including the canal itself, is also explored, demonstrating long-standing heavy industrial uses on the application site and throughout the wider area.
- 7.32 Policy 7.7 targets large and tall buildings and states proposals should not have a detrimental impact on the surroundings. Paragraph 7.25 defines tall buildings as those that are substantially taller than their surroundings, cause a significant change



to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor.

- 7.33 The emphasis of this policy is, therefore, to manage particularly tall buildings, which are substantially taller than the surrounding area. Whilst the largest element of the proposal – the stack for the asphalt plant – is 30m high, and the main asphalt plant structure is 27.8m high (comprising an enclosure for the asphalt plant only), this is set in the context of surrounding taller structures (e.g. Nestle chimney, Tarmac plant and Southall gas holders). An assessment of the impact of the proposed structures on the surrounding area is, however, considered further in the accompanying Townscape and Visual Impact Assessment
- 7.34 With regard to air quality, Policy 7.14 sets out that Councils should promote sustainable design and construction to reduce emissions and development should at least be ‘air quality neutral’ and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs). This is fully considered within the accompanying Air Quality Impact Assessment submitted with the application.
- 7.35 In terms of reducing noise, Policy 7.15 sets out that development should minimise the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals. New noise sensitive development should be separated from major noise sources wherever practicable through the use of distance, screening, or internal layout in preference to sole reliance on sound insulation.
- 7.36 Issues relating to potential noise generation, and the likely impact of this on surrounding receptors, is discussed within the supporting Acoustic Assessment. It should be noted, however, that extensive noise attenuation measures are to be incorporated into the development, including attenuation of individual plant elements, together with site-wide acoustic mitigation.
- 7.37 Located adjacent to the Grand Union Canal, Paddington Branch, policies within the London Plan on the Blue Ribbon Network are relevant. In this regard, Policy 7.24 states:

“The Blue Ribbon Network is a strategically important series of linked spaces. It should contribute to the overall quality and sustainability of London by prioritising uses of the waterspace and land alongside



it safely for water related purposes, in particular for passenger and freight transport”.

- 7.38 Policy 7.30 sets out that development proposals along London’s canal network and other rivers and water space should respect their local character and contribute to their accessibility and active water related uses, in particular transport uses, where these are possible. As set out above, whilst not part of this proposal, the feasibility of utilising the canal for operational purposes is currently being explored by the applicant.
- 7.39 The London Plan provides strong policy support for the application proposals. It encourages the redevelopment of vacant brownfield land, the retention of land designated for industrial uses and the reuse of recyclable materials, all of which is incorporated in the application proposals.

b) The Mayor’s Transport Strategy (May 2010)

- 7.40 This Strategy sets out the Mayor’s targets and priorities for transport within Greater London over the next 20 years. The relevant policies are considered below.
- 7.41 Policy 15 outlines the Mayor’s aspirations to reduce emissions of air pollutants from transport.
- 7.42 Policy 24 goes on to state:

“The Mayor, through TfL, and working with the DfT, Defra and other government agencies, Network Rail, train operating companies, freight operators, London boroughs and other stakeholders, will take the necessary steps to deliver the required contribution from ground-based transport to achieve a 60 per cent reduction in London’s CO2 emissions by 2025 from a 1990 base; and to contribute to further targets that maybe set by the Mayor from time to time”.

- 7.43 Proposal 97 states:

“The Mayor, through TfL, and working with the London boroughs, transport operators, and other stakeholders, will support, promote and improve sustainable, low CO2-emitting transport (including public transport, cycling, walking, and rail and water for freight), and reduce the need to travel through integration of transport and land use planning”.



- 7.44 The Transport Strategy encourages the use of rail and water for the movement of freight, together with the reduction of pollutants and CO₂. With regard to the latter point, a significant advantage of the proposals is that they will result in the reduction of cross-London vehicle movements, from the applicant's existing facilities, to service contracts located in the western sub-region. This will result in significant CO₂ savings. Regarding use of the rail or river network, as set out above, there is currently no available access to the canal or rail network from the application site. However, the applicant is considering whether future use of the canal is feasible.
- 7.45 Impact on the local and strategic highway network is deemed to be minimal and this is considered in the TIA included with the application. With this in mind, the strategic benefits resulting from the proposals, which will be of particularly benefit to the wider strategic road network, are supported by the Mayor's Transport Strategy.

c) Draft Land for Industry and Transport SPG (February 2012)

- 7.46 The draft Land for Industry and Transport SPG sets out the proposed guidance to supplement the policies in the London Plan relating to land for industrial activities and transport.
- 7.47 Chapter 7 relates to waste management and recycling and Policy SPG 7 states (our underlining):

“In implementing London Plan policies, the Mayor will and TfL, boroughs and other partners should:

Take into account the need to accommodate additional waste management and recycling facilities in assessments of supply and demand for industrial land and make sufficient provision in DPDs to meet the waste apportionment targets set out in the London Plan;

Have regard to the indicative land requirements for additional waste management and recycling facilities 2011- 2031 set out in Annex 2;

Take a proactive approach to accommodate additional waste management and recycling facilities, make efficient use of available sites and facilitate the redevelopment and intensification of existing occupied industrial land for waste management purposes;

Consider existing and emerging best practice in the design of new waste management facilities and explore opportunities for co-



location of waste treatment facilities with other forms of development;

Take account of the capacity of existing and potential transport infrastructure to support sustainable movement of waste, and products arising from resource recovery, and to use modes other than road transport when practicable”.

- 7.48 The proposals are in line with the policy aims of the draft SPG, facilitating an aggregate and gully waste recycling plant, together with an asphalt production plant, which will utilise the recycled material. This combined process will result in the redevelopment of a vacant brownfield site and significant reductions in the quantity of material which otherwise is likely to end up as waste in landfill sites.

d) Industrial Capacity Supplementary Planning Guidance (March 2008)

- 7.49 This document provides guidance on the implementation of policies relating to industrial capacity in the Mayor's London Plan. The SPG addresses the London Plan's broader concerns, including those to secure efficient and effective use of land, environmental improvement and wider sustainability objectives, especially those to tackle climate change.

- 7.50 Paragraph 4.3 states:

“Preferred Industrial Locations (PILs) are suitable for firms that have less demanding environmental requirements and typically fall within the B1(c), B2 and B8 Use Classes. They are also suitable for waste management and recycling uses, utilities and some transport related functions such as rail and bus depots and inter-modal freight facilities. PILs will not normally be suitable for B1(a) and B1(b) uses, although some ancillary B1(a) use is acceptable and some transfer between these classes may be inevitable under the General

Permitted Development Order. PILs will not normally be suitable locations for large scale B1(a) office development. Nevertheless, they may be appropriate for other uses of an industrial nature, including some of those classified as sui generis such as car breaking, metal re-cycling, aggregate processing, iron and steel prefabrication. However, this cannot be taken as a general policy position, not least because, by their nature, sui generis uses must be treated on their individual merits”.

- 7.51 Policy SPG 6 states:



“In implementing London Plan policies, the Mayor will and the LDA, TfL, boroughs and others partners are asked to:

- (i) take into account the need to accommodate additional waste management and recycling facilities in assessments of supply and demand for industrial land and make sufficient provision in DPDs to meet the waste apportionment targets set out in the London Plan;**
- (ii) have regard to the indicative land requirements for additional waste management and recycling facilities 2006-2021 set out in Annex 6;**
- (iii) take a proactive approach to accommodate additional waste management and recycling facilities, make efficient use of available sites and facilitate the redevelopment and intensification of existing occupied industrial land for waste management purposes;**
- (iv) consider existing and emerging best practice in the design of new waste management facilities (see paragraphs 6.9 to 6.11) and explore opportunities for co-location of waste treatment facilities with other forms of development;**
- (v) take account of the capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from resource recovery, and to use modes other than road transport when practicable”.**

7.52 Policy SPG 9 states:

“In implementing London Plan policies, the Mayor will and Boroughs, the LDA, TfL and other partners are asked to:

- (i) ensure that development of land in, and provision and refurbishing of premises for, industrial and related uses contribute to strategic climate change mitigation and adaptation objectives;**
- (ii) encourage the redevelopment of London’s industrial areas to enhance their offer as competitive locations attractive to modern industry;**
- (iii) seek imaginative, sensitive design and investment solutions which do not entail a net loss of industrial capacity, which make more efficient use of space and enhance the environment within and around industrial areas;**



(iv) consider how planning agreements might be used in light of local circumstances to secure London Plan objectives, including premises for different types of industrial occupier, transport, training, e-related and other infrastructure, contributions towards site assembly and decontamination and meeting the needs of specialist industries;

(v) make provision for demand for ‘bad neighbour’ industrial uses in environmentally acceptable locations, normally within PILs, and through good design ensure that they do not compromise the viability of other activities or the regeneration potential of the wider area;

(vi) promote access to employment and target skills investment taking into account the LDA’s emerging Employment and Skills Strategy”.

- 7.53 It does, therefore, provides further clarity and support for the application proposals, encouraging use of Preferred Industrial Land for uses entirely in accordance with the application proposals.
- 7.54 To ensure the aspirations of the London Plan are delivered, including the provision of waste management and recycling facilities, the SPG encourages proactive thinking and decision making by Local Authorities, TfL and the Mayor.



SECTION 8: LOCAL PLANNING POLICY

8.1 There are a number of relevant local planning policy considerations and these are considered below.

a) London Borough of Hillingdon Unitary Development Plan (Saved Policies 2007)

8.2 The Proposals Map shows that the site falls within an area for industrial and business uses and lies south of a Park Site of Borough Grade I Importance for Nature Conservation (the Minet Country Park). The site also lies west of the Grand Union Canal (Site of Metropolitan Importance for Nature Conservation) and Bulls Bridge Conservation Area, and east of the A312 Strategic Route (a raised flyover).

8.3 Regarding the proposed land use, Policy LE1 states:

“all proposals for industry (b2), warehousing (b8) and business (b1) development will be assessed by taking into account other policies of this plan and, where appropriate, the following considerations:-

(i) whether the proposal conflicts with the local planning authority's overall objective of securing the development or regeneration of an area;

(ii) outstanding unimplemented planning permissions, development under construction and vacant floorspace elsewhere in the plan area;

(iii) the availability and capacity of public transport facilities serve proposals for employment intensive uses;

(iv) the ability of the road system, as existing or taking due account of committed improvements, to accommodate at normal peak hours the additional traffic generated;

(v) whether any proposal for major development will create unacceptable demands for other land to be developed (for example, to provide for new housing or community facilities);

(vi) the provision for access by people with disabilities and other accessible facilities both to and within buildings”.



8.4 The proposals are supported by the industrial and business allocation shown on the UDP Proposals Map, and, if permitted, will bring this large vacant site back into active use, in line with the industrial uses surrounding the site. The accompanying assessments demonstrate that there will be no significant adverse impact on the road system, and that there will be no associated access issues. Indeed, it is our view that the site is ideally located to accommodate the application proposals.

8.5 Policy LE7 states:

“The local planning authority will where appropriate, seek to ensure that development proposals for industrial, warehousing and business uses provide planning benefits related to the scale and type of the development”.

8.6 With specific reference to the former Powergen site (the application site) Policy PR10 states:

“Land at North Hyde Gardens, Hayes as identified on the proposals map should be developed for business, industrial and warehousing purposes and associated canalside activities within the conservation area and should take into account the following:

(i) the need for planned comprehensive treatment of the whole site;

(ii) the need for improvements to the junction of North Hyde Gardens and North Hyde Road;

(iii) measures to ameliorate the impact of traffic on residents;

(iv) adequate access arrangements for nestles;

(v) conservation area and canalside enhancement;

(vi) the contribution of the proposal to the economic regeneration of Hayes”.

8.7 The six considerations set out above have shaped the development proposals. The resulting proposal will see the application site brought back into active industrial use, providing up to 79 jobs and enhancing the economic regeneration of the area. The proposals achieve this whilst respecting the adjacent conservation area, the amenity of surrounding operators, including Nestle and other large scale industrial uses nearby, and the nearest existing and proposed residential receptors.



8.8 Regarding development near the Grand Union Canal, Policy BE32 states:

“When considering proposals for development adjacent to or having a visual effect on the grand union canal, the local planning authority will seek to ensure that every opportunity is taken to:

(i) secure and where possible enhance the role of the canal and its immediate surrounds as a wildlife corridor;

(ii) secure environmental improvements appropriate to waterside areas;

(iii) ensure that buildings are of a design which complements the visual qualities of the canal in terms of scale, bulk, layout and materials;

(iv) conserve buildings or features associated with the working life of the canal;

(v) create new public access to the waterside and towpath linked to the footpath network in the surrounding area;

(vi) enhance or create views through and from the development, from and towards the watercourse; and

(vii) retain existing leisure moorings unless alternative provision is made in suitable locations”.

8.9 In line with the requirements of this policy, the proposals will benefit the setting of the Grand Union Canal and ensure there is no adverse impact on the amenity or enjoyment currently experienced by users of the canal and towpaths. The proposals have been designed to safeguard the leisure moorings. Significant enhancement of the landscaping on the eastern boundary of the site, together with an acoustic screen, will enhance the setting of the canal.

8.10 As stated in the previous section, the applicant is also in discussion with the Canal and River Trust regarding the potential for future commercial use of the canal. Subject to the findings of a feasibility study, this may be incorporated at a later date.

8.11 In relation to the overall appearance of the development, Policy BE35 considers views from major transport routes, including the railway line which bounds the site to the north. It states:



“When considering proposals for major development adjacent to and visible from major road and rail connections to Heathrow and central London, namely the M4 and Heathrow Spur, the A4, the A40, the Paddington to Bristol and the Marylebone to Birmingham railway lines and the Heathrow express link, the local planning authority will seek to ensure:

(i) that development is of a high standard of design, layout and landscape;

(ii) that where opportunities arise, attractive views and important local landmarks are opened up from these transport corridors”.

8.12 The site is a vacant brownfield parcel of land, with a raised bund around the perimeter. An active industrial use, with various facilities and functions will ensure the site is used in a similar manner to the surrounding land, and indeed its industrial heritage, which is prevalent along this section of the railway line. The proposals are therefore in character and context with the area.

8.13 Policy EC1 states that development which would adversely affect the integrity of sites of special scientific interest, or be unacceptably detrimental to sites of Metropolitan or Borough (Grade I) importance for nature conservation, designated local nature reserved and other nature reserved will not be permitted. Development proposed on or in the vicinity of such sites will need to be accompanied by an ecological assessment.

8.14 Policy EC 3 requires that proposals for development in the vicinity of sites of nature conservation importance have regard to the potential effects resulting from changes in the water table and of air, water, soil and other effects. This is considered in greater detail in the accompanying Ecology Impact Assessment Report submitted with the application.

8.15 Policy AM18 states:

“Where appropriate, in developments adjoining the Grand Union Canal the local planning authority will seek to secure canalside facilities for canal borne freight, as well as for recreation, amenity and nature conservation”.

8.16 The use of the canal for transportation of material continues to be assessed and discussions are ongoing with the Canal and River Trust. In the meantime, however,



use of the wider highway network is considered an appropriate, and indeed the only, alternative.

- 8.17 Regarding the site's proximity to the Bulls Bridge Conservation Area, Policy BE4 states:

“New development within or on the fringes of conservation areas will be expected to preserve or enhance those features which contribute to their special architectural and visual qualities; development should avoid the demolition or loss of such features. There will be a presumption in favour of retaining buildings which make a positive contribution to the character or appearance of a conservation area. Applications for planning permission should contain full details, including siting and design, or replacement buildings. Applications for consent for demolition will depend upon the submission and approval of such details”.

- 8.18 The proposals have been fully assessed in terms of their visual impact, and Accurate Visual Representations have been produced. The accompanying Townscape and Visual Impact Assessment concludes that despite the proximity of the application site to the heritage assets, there will be no adverse impact. Indeed the site has been laid out to protect the character and appearance of the conservation area and the views to and from it. Consideration of the site's context is also provided, although it is clear that this is dominated by industrial and warehousing uses.

- 8.19 Policy BE 25 targets design further, stating:

“The local planning authority will seek to ensure modernisation and improvement of industrial and business areas through careful attention to the design and landscaping of buildings and external spaces. Where appropriate it will seek improved vehicular and pedestrian access and circulation routes through the area, and environmental improvements”.

- 8.20 Policy BE 34 considers development adjacent to rivers. It states:

“When considering proposals for development adjacent to or having a visual effect on rivers the local planning authority will, where appropriate, seek:

- i. to secure and where possible enhance the role of the river and its immediate surroundings as a wildlife corridor;**
- ii. environmental improvements to waterside areas;**



- iii. **building designs which complement the visual qualities of the Riverside;**
- iv. **public access to the waterside linked to the footpath network in the surrounding area;**
- v. **a minimum 6 metres of land reserved and landscaped alongside rivers, suitable for public access; and**
- vi. **to enhance or create views through and from the development, from and towards the watercourse”.**

8.21 The Yeading Brook runs along the western boundary of the site, at a significantly lower level. No access to the river is available from the application site. However, in order to ensure the Brook is enhanced, landscaping is proposed in the strip of land along the western boundary.

8.22 In relation to policies to control the construction of tall buildings, Policy BE36 states that within certain ‘sensitive’ areas, high buildings and structures, will only be permitted if the Local Planning Authority is satisfied that they will not:

- i. **“mar the skyline;**
- ii. **intrude unacceptably into important local views; or**
- iii. **interfere with aviation and navigation”.**

8.23 Paragraph 5.45 goes on to state that it is not the intention to refuse all high buildings in these areas as some tall Structures can offer benefits in functional or townscape terms. Whilst it is accepted that the proposed structures are likely to be considered tall, with a maximum height of 30 metres (for the asphalt plant stack only) the TVIA concludes that the proposal can satisfy the three criteria listed above. This is in the context of the existing tall structures which exist in the area, including the Tarmac Plant (38 metres), the Nestle chimney and the Southall Gas Holder.

8.24 Policy BE38 states that development proposals will be expected to retain and utilise topographical and landscape features of merit and provide new planting and landscaping wherever it is appropriate. Planning applications will be required to provide an accurate tree survey showing the location, height, spread and species of all trees where their proposals would affect any existing trees. Accordingly an



Arboricultural Impact Assessment is submitted with the application, which accurately plots the location of all trees on, or adjacent to, the application site. Furthermore, these are retained as part of the proposal.

8.25 Policy OE1 considers the impact of all proposals on existing amenity, stating:

“Planning permission will not normally be granted for uses and associated structures which are, or are likely to become, detrimental to the character or amenities of surrounding properties or the area generally, because of:

- i. the siting or appearance;**
- ii. the storage or display of vehicles, goods, equipment or other merchandise;**
- iii. traffic generation and congestion;**
- iv. noise and vibration or the emission of dust, smell or other pollutants, unless sufficient measures are taken to mitigate the environmental impact of the development and ensure that it remains acceptable”.**

8.26 In relation to noise, Policy OE3 sets out that proposals which have the potential to cause noise annoyance will only be permitted if the impact is mitigated within acceptable levels by engineering, lay-out or administrative measure.

8.27 Policy OE5 further states:

“Proposals for the siting of noise sensitive developments such as family housing, schools or certain forms of commercial activity where the occupiers may suffer from noise or vibration will not be permitted in areas which are, or are expected to become, subject to unacceptable levels of noise or vibration. where development is acceptable in principle, it will still be necessary to establish that the proposed building or use can be sited, designed, insulated or otherwise protected from external noise or vibration sources to appropriate national and local standards. account will be taken of any changes likely to occur in noise levels within a 10-15 year period following the date of submission of any application for planning permission”.

8.28 Issues with regard to noise have been dealt with separately in the accompanying Noise Report. It has been acknowledged that whilst the site is located within a



Preferred Industrial Location, noise sensitive receptors are located nearby, including the leisure moorings along the Grand Union Canal. The amenity value of the canal, the moorings and the towpaths is considered valuable, and this is reflected in the layout of the proposal and the design of the attenuation around the site.

8.29 Regarding flooding, Policy OE7 states:

“In the areas liable to flooding permission will not be granted for new development or the intensification of existing development unless a developer is prepared to implement flood protection measures as part of the proposed development to a standard satisfactory to the council, in consultation with the environment agency and where appropriate, other drainage bodies”.

8.30 Policy OE8 states:

“Planning permission will not be granted for new development or redevelopment of existing urban areas which would result in an increased flood risk due to additional surface water run-off, unless the proposed development includes appropriate attenuation measures to a standard satisfactory to the council, in consultation with the environment agency and, where appropriate, other drainage bodies”.

8.31 With regard to sewerage flooding, Policy OE9 states:

“In catchments which have a potential for sewerage flooding permission will not normally be granted for development which may precipitate such flooding or further flooding, until sufficient improvement has been implemented to alleviate the problem”.

8.32 Policy OE10 states:

“In areas of potential flooding or inadequate capacity of the foul and surface water sewerage system to receive the additional discharge from the development, a phased development may be required to match the provision of infrastructure so that the exiting system is not overloaded to the detriment of the community as a whole”.

8.33 The application site falls within Flood Zone 1, and the accompanying Flood Risk Assessment concludes that there will be no greater risk of flooding as a result of the development proposals. This is supported by the content of the Drainage Strategy, which proposes outline drainage measures, utilising existing facilities on site, to help minimise any potential flood risk.



8.34 Policy OL 22 targets derelict and vacant sites, stating:

“Proposals relating to damaged, derelict and otherwise degraded land should be accompanied by an assessment of its current condition and of any adverse effects on adjacent land. Such an assessment should also indicate, as far as is practicable, measures that would negate or contain the causes of the land's unsatisfactory condition of the land”.

8.35 Policy OL 23 states:

“Where appropriate, the local planning authority will seek to ensure that schemes to restore/reclaim damaged, derelict and otherwise degraded land include provision for a period of aftercare continuing for five years after the completion of restoration works. Schemes should provide for maintenance of the restored land, pollution control measures, and the correction of any emerging deficiencies, and may include financial arrangements to guarantee such work for an appropriate period”.

8.36 In line with the requirements of both these policies, a Ground Conditions Assessment and Land Remediation Strategy Report is provided in support of the application. Appropriate measures are proposed to manage the existing contamination and ensure the safe future use of the site.

8.37 Policy MIN16 provides specific guidance on the nature of the use proposed. It states:

“The local planning authority in considering development proposals will encourage the provision and improvement of premises and facilities for efficient and environmentally acceptable disposal, recycling, energy recovery or other handling and treatment of waste materials, subject to other policies in the plan”.

8.38 Also of particular relevance in this regard is Policy MIN 17, which states, *inter alia*:

“The local planning authority will, subject to applicants being able to establish that their proposals are in accordance with the policies in this plan and other environmental considerations, regard concrete crushing/soil screening plants acceptable in broad principle:

In the following circumstances:-

... (iv) on sites within industrial and business areas on the proposals map which have good access to the primary road network;



(v) at waste transfer/ civic amenity sites where there is good access to the primary road network”.

8.39 The proposals are in line with both Policy MIN16 and MN17, facilitating use of the site as an aggregate and gully waste recycling plant, together with an asphalt plant to utilise the recycled material. This process will significantly reduce the amount of material sent to landfill as a waste product (currently projected to be up to 300,000 tonnes per annum).

8.40 Policy MIN23 also targets the proposed use, stating:

“Schemes for mineral extraction, mineral processing, landfill, waste handling or treatment must demonstrate at all adjacent noise sensitive locations that:

(i) the impact of noise is mitigated to the satisfaction of the minerals planning authority having regard to the noise limits specified in mpg11 and local circumstances; and

(ii) any permitted operations will be subject to an independent noise monitoring and control scheme throughout their duration, and the results submitted to the local planning authority.

Where appropriate the minerals planning authority will seek an agreement to achieve the aims of the policy.”

8.41 The impact of noise has been considered as the proposals have evolved, with operational noise levels taken from the applicant’s existing facilities in south east London. This is detailed in full in the accompanying Noise Report. The resulting scheme accords with the Council’s noise criteria, both in terms of impact on the nearest residential properties, and the impact on the adjacent Grand Union Canal, which is an area of high amenity value.

8.42 Policy MIN 24 supports the provision of new recycling facilities, close to existing long-term centres of demand, subject to three criteria:

- i. **“with satisfactory direct access to the primary road network;**
- ii. **where there will be no loss of environmental amenity, especially by excessive noise, dust, fumes or traffic;**



iii. **where visual impact is minimised and overall design is of a high standard”.**

- 8.43 Consideration of these tests is provided within the accompanying technical studies, and these confirm that all three criteria are satisfied.
- 8.44 Detailed policies relating to transport are further considered in the accompanying TIA, although a brief summary is provided below.
- 8.45 Policy AM2 sets out that all proposals will be assessed against, *inter alia*, their contribution to traffic generation and their impact on congestion, particularly on the principal road network.
- 8.46 Policy AM7 goes on to state that traffic generated by proposed developments must be acceptable in terms of capacity and functions of existing and committed principal roads only. Permission will not be granted for proposals that result in unacceptable increase in demand along roads or through junctions which are already at capacity.
- 8.47 Finally, Policy AM15 requires that car parks provided for new development shall contain conveniently located reserved spaces for disabled persons in accordance with the Council’s adopted car parking standards.

b) **Hillingdon Local Plan Part I – Strategic Policies (previously known as the Core Strategy)**

- 8.48 The Inspector’s Report on the examination was received from the Inspector on 26 July 2012. This concluded that the Hillingdon Local Plan Part I - Strategic Policies (formerly prepared as the Core Strategy) provides appropriate and sound policies to guide the planning of the Borough over the next 15 years, provided two main modifications are made, which relate to:

1. **“the presumption in favour of sustainable development, necessary for consistency with the National Planning Policy Framework; and**
2. **new policy (Policy T5) to require developer contributions to Crossrail, which is necessary to conform to the London Plan”.**

- 8.49 Once these modifications are made, and the document is adopted, it will gradually supersede the UDP (expected late 2012). It is therefore a material consideration.



- 8.50 Policy HE1 states that the Council will conserve and enhance Hillingdon's distinct and varied environment including its heritage assets, including conservation areas, listed buildings and 19th and 20th century industrial areas, including the Grand Union Canal and its features.
- 8.5 Policy BE1 seeks to achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place.
- 8.52 In relation to tall buildings, part of Policy BE 1 states proposals should not adversely affect their surroundings, impact on important views, or cause harm to the significance of heritage assets:
- 8.53 Para 7.12 goes on to state:
- “Tall buildings may be acceptable in a limited number of suitable locations where the Council considers that they will not seriously harm the surrounding area and its heritage assets, and will also deliver wider benefits to the proposed Opportunity Area. Parts of Uxbridge and Hayes may be appropriate locations for tall buildings subject to the Council preparing a characterisation study and tall buildings assessment together with such considerations as the Obstacle Limitation Surfaces for Heathrow Airport. The height of buildings should be appropriate to the surrounding townscape. All such proposals will require appropriate accompanying urban design assessments and will be assessed using the criteria for evaluation identified by CABI and English Heritage in ‘Guidance on Tall Buildings’ and local guidance. The Council will prepare a borough characterisation study and more detailed tall buildings study in order to identify appropriate strategic locations where tall buildings may be appropriate”.**
- 8.54 Consideration of the height of the proposals has been considered throughout the design process, resulting in the hot storage facility being located adjacent to the main asphalt plant, which ensures the overall height is kept to a minimum. It is also noticeable that structures in the surrounding area significantly exceed the height of the proposal asphalt plant, including the Tarmac site to the north, the Nestle chimneys to the west, and the Southall Gas Works gas holder to the north-east.
- 8.55 Policy EM1 focuses on climate change adaptation and mitigation and sets out that the Council will ensure that climate change mitigation is addressed at every stage of the development process and will encourage sustainable techniques for the



remediation of land. Details of the proposed remediation strategy, together with the operational energy and sustainability measures incorporated into the design are provided in the supporting documents.

- 8.56 Policy EM1 also goes on to state that the Council expects proposals for development of contaminated land to provide mitigation strategies that reduce the impacts on surrounding land uses. Major development proposals will be expected to demonstrate a sustainable approach to remediation that includes techniques to reduce the need to landfill. Further details on the proposed remediation techniques, which have been agreed in principle with the Environment Agency, are set out within the Remediation Strategy submitted with the application. In summary, however, in line with the emphasis of Policy EM1 the agreed approach will ensure there is minimal amount of material taken to landfill during the site enabling works, as material will be treated on site as required and reused. Indeed, the materials in the existing bund around the perimeter of the site will be spread across the site, rather than removed to landfill, and capped with hard standing in compliance with the EA's requirements. This will result in the site level rising by up to 1.2 metres above the current level. This demonstrates that the applicant has considered the environmental impacts of preparing the site for redevelopment.
- 8.57 Policy EM3 on the blue ribbon network states that the Council will continue to promote and contribute to the positive enhancement of the strategic river and canal corridors and the associated wildlife and habitats through the Biodiversity Action Plan and the Thames River Basin Management Plan. Developer contributions will also be sought, where appropriate, and reducing carbon emissions from developments will also assist.
- 8.58 Policy EM6 on flood risk management sets out that the Council will require new development to be directed away from away from Flood Zones 2 and 3 in accordance with the principles of the NPPF. Policy EM7 further states that the Council will encourage the use of sustainable urban drainage systems (SUDS) that promote ecological connectivity and natural habitats across the borough in all developments. The site is located in an area at low risk of flooding – Flood Zone 1 – and this is considered further in the accompanying FRA and outline Drainage Strategy.



- 8.59 With regard to air quality, Policy EM8 sets out that development should cause no deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors. Map 8.5 of the Core Strategy shows that the site is located within an Air Quality Management Area (AQMA) and Policy EM8 goes on to say that all major development within the Air Quality Management Area (AQMA) should demonstrate air quality neutrality (no worsening of impacts) where appropriate; actively contribute to the promotion of sustainable transport measures such as vehicle charging points and the increased provision for vehicles with cleaner transport fuels; deliver increased planting through soft landscaping and living walls and roofs; and provide a management plan for ensuring air quality impacts can be kept to a minimum.
- 8.60 With regard to noise, the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.
- 8.61 Issues relating to air quality and noise management, together with details on how the proposals have evolved to reflect these requirements, are set out in the accompanying Noise and Air Quality Impact Assessments and the Design and Access Statement.
- 8.62 Policy EM8 also states that the Council will require that all new development demonstrates the incorporation of water efficiency measures within new development to reduce the rising demand on potable water. All new development must incorporate water recycling and collection facilities unless it can be demonstrated it is not appropriate. This is achieved throughout the site, as water will be collected for re-use both from the gully waste recycling plant and indeed site-wide surface water as far as is practicable. This is detailed in the outline Drainage Strategy Report, and further details are likely to be agreed by condition.
- 8.63 Paragraph 8.148 of the document states that it is important that there is an adequate supply of raw materials to provide the infrastructure, buildings and goods that society, industry and the economy needs and, therefore, it is a key component in sustaining economic prosperity. Provision for the production and supply of recycled and secondary aggregates will be made through the Hillingdon Local Plan: Part 2 Site Specific Allocations LDD whereby permanent and long term temporary recycling facilities across the Borough which will make a positive contribution to the production



of recycled and secondary aggregates will be identified (not yet available). Aggregates come from a variety of sources, including recycling of construction waste, which is exactly what is proposed at the application site (albeit the construction material will arise from highways maintenance works rather than traditional construction works). The application proposals are therefore fully supported.

- 8.64 Policy EM9 outlines that the Council will safeguard mineral resources in Hillingdon from other forms of development that would prejudice future mineral extraction. Policy EM10 further states that the Council will make an appropriate contribution towards the West London waste/recycling apportionment figure in the London Plan.
- 8.65 Policy EM11 on sustainable waste management sets out that the Council will aim to reduce the amount of waste produced in the Borough and work in conjunction with its partners in west London, to identify and allocate suitable new sites for waste management facilities within the Joint West London Waste Plan to provide sufficient capacity to meet the apportionment requirements of the London Plan, (382 thousand tonnes per annum for Hillingdon by 2026). The Council will require all new development to address waste management at all stages of a development's life from design and construction through to the end use and activity on site, ensuring that all waste is managed towards the upper end of the waste hierarchy. The Council will follow the waste hierarchy by promoting the reduction of waste generation and will promote waste as a resource and encourage increased re-use of materials and recycling and seek to maximise the use of existing waste management sites through intensification or co-location of facilities.
- 8.66 Policy EM11 is, therefore, arguably the most relevant of all the policies at the local level. It fully supports the application proposals, encouraging the sustainable reuse of materials wherever possible in an attempt to minimise waste generation. This is precisely what the applicant proposes, as set out in paragraph 7.15 above.
- 8.67 In relation to transport and vehicle movements, Policy T1 outlines that the Council will steer developments to the most appropriate locations in order to reduce their impact on the transport network.
- 8.68 As outlined in the TIA, access to the site is restricted to North Hyde Gardens, which provides the sole means of access to the site. There is currently no direct access



from the canal or towpaths or the railway line to the north. However, use of the canal will continue to be explored to ascertain whether this provides a feasible alternative.

- 8.69 Policy E1 states that the Council will accommodate growth by protecting Strategic Industrial Locations and the designation of Locally Significant Industrial Sites (LSIS) and Locally Significant Employment Locations (LSEL) including the designation of 13.63ha of new employment land. The application site is included within these protected areas, thus ensuring the continued designation as an industrial / employment site.
- 8.70 E2 outlines that employment growth will be directed towards suitable sites in the Heathrow Opportunity Area, Strategic Industrial Locations, Locally Significant Employment Locations (LSEL) Locally Significant Industrial Sites (LSIS), Uxbridge town centre and Hayes Town Centre with a particular focus around transport nodes. In line with the application proposals, the Council will promote development in highly accessible locations that delivers sustainable travel patterns and contributes to the improvement of existing networks to reduce emissions and impacts on air quality.
- 8.71 Policy SD1 sets out that when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). The Council will always work proactively with applicants 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 Hillingdon.
- 8.72 The emerging Local Policy guidance does, therefore, provide strong support for the application proposals as it seeks to encourage the continued protection of existing industrial / employment land, together with new active uses of this nature, and an overarching presumption, in line with the NPPF, in favour of sustainable development.
- c) **West London Waste Plan (WLWP) (Proposed Site and Policies February 2011)**
- 8.73 Hillingdon Council is in the process of preparing a joint waste plan in association with London Boroughs of Brent, Ealing, Harrow, Hounslow and Richmond upon Thames Councils. The WLWP is due to be adopted by late 2012.



- 8.74 Table 1.1 of the WLWP reiterates that by 2020 the London Plan expects 95% of construction, demolition and excavation waste to be managed within Greater London. There is, therefore, an increasing demand for Local Authorities to act responsibly and maximise recycling capabilities, and minimise waste generation, wherever possible.
- 8.75 The WLWP identifies the application site, together with the adjoining DHL Storage and Distribution Centre, (referred to as '*Yeading Brook, Former Powergen Site, Bulls Bridge*'), as a possible new site for a waste management facility. The Site Report, prepared alongside the WLWP Proposed Sites and Policies main Report (attached at Appendix 3), confirms that there are no '*show stoppers*'.

APPENDIX 3

- 8.76 Indeed, the results from the other '*Manual Screening Criteria*' are particularly positive. Notably the report gives the highest score possible in relation to the '*proximity to residential areas*' criteria, confirming that:

“the site is approx. 400m from the nearest residential properties which is beyond a further industrial estate”.

- 8.77 In this regard it is acknowledged in the supporting documents that proposed residential properties are located at the Southall Gas Works site, the boundary of which is closer than 400m, although this planning permission has not yet been implemented.

- 8.78 Vehicle access also receives 10 out of 10, stating:

“access to the A312 is approx. 600m away in an industrial setting”.

- 8.79 In relation to the potential for visual intrusion, the application site also scores the highest possible mark (5 out of 5). The comment states:

“development on site is unlikely to result in an increase in visual intrusion as the site is well screened”.

- 8.80 In fact the only area in which the proposals do not receive the highest possible score with regards to its suitability, is the site configuration criterion, where 3 out of a possible 5 is scored. This is due to the overall size of the site, together with the fact



that the Yeading Brook cuts across the north-west corner of the site (between the application site and the DHL site).

8.81 The proposed allocation of sites as part of the WLWP commenced prior to FM Conway's interest in the site and therefore it has not been possible for FM Conway to publically express their own aspirations for the site as part of this process. Notably however, the application proposals correlate very closely with what the West-London Local Authorities consider to be a suitable alternative use for the site. Indeed, the policies are very supportive of waste / recycling uses, such as that proposed by the application.

8.82 WLWP Policy 1 states:

“Waste development proposals on sites listed in Tables 4-1 and 4-2 will generally be supported, provided that the proposals comply with the other WLWP policies and the borough's Local Development Framework. To ensure no loss in existing capacity, re-development of any existing waste sites must ensure that the quantity of waste to be managed is equal to or greater than the quantity of waste which the site is currently permitted for”.

8.83 Table 4-2 within the WLWP lists the application site as being a possible new site for a waste management facility.

8.84 WLWP Policy 2 states:

“All waste development proposals will be required to demonstrate, for the construction and operational phases of the development, that:

- **adequate means of controlling noise, dust, litter, odours and other emissions are incorporated into the scheme;**
- **there is no significant adverse effect on the established, permitted or allocated land uses likely to be affected by the development; where necessary this is to be demonstrated by a Environmental Impact Assessment**
- **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. An appropriate BREEAM or CEEQUAL rating may be required**



- active consideration has been given to the transportation of waste by modes other than road, principally by water and rail;
- transport directly and indirectly associated with the development will not exceed the capacity of the local road network; where necessary this is to be demonstrated by a Transport Impact Assessment;
- the development makes a positive contribution to climate change adaptation and mitigation to be demonstrated through the submission of a sustainable design and construction statement;
- the development has no significant adverse effects on local biodiversity and that there are no likely significant impacts or adverse effects on the integrity of an area designated under the Habitats Directive;
- there will be no significant impact on the quality of surface and groundwater. A Sustainable Urban Drainage System may be required;
- there will be no increased flood risk in line with PPS25; where necessary this is to be demonstrated by a Flood Risk Assessment;
- there is no foreseeable adverse impact on health; where necessary this is to be demonstrated by a Health Impact Assessment; and
- **Green Travel Plans have been considered, where appropriate”.**

8.85 Issues relating to the construction and operational use of the site have been fully considered within the supporting documents. The applicant is confident, however, that the proposals satisfy the range of policy requirements through the use of attenuation, mitigation and effective site management.

8.86 Policy WLWP Policy 4 states:

“To encourage sustainable waste management, waste management developments will be permitted where it can be demonstrated that:



- **At least 10% of the materials or products used in the construction and/or operation of the development are re-used or recycled and sourced locally;**
- **Construction, demolition and excavation wastes are reused or recycled on site, where practicable.**
- **All waste management developments must produce construction phase Site Waste Management Plans”.**

8.87 The preferred option is to maximise on-site recycling from the moment construction works commence. Indeed, as set out above, the existing material formed into the bund around the perimeter of the site will be utilised in preparing the site for development, minimising transfer to landfill. Likewise, when operational, all material delivered to site, whether by HGV or in the gully waste suckers, will be processed and reused on site (with the exception of perhaps 2% of material – paper, metals, plastics etc – which cannot be recycled on-site, is sent off-site for recycling). The proposals do, therefore, fully accord with the principle of Policy WLWP4.

d) Southern Hillingdon Area Action Plan (AAP)

8.88 This document was produced as part of the LDF suite of documents. Following discussions with the Council’s Planning Policy department it is understood that the content of the Draft WLWP is considered more relevant and up to date. Interestingly, however, the emphasis of the AAP is the same as the more recent documents, confirming the site’s allocation as part of the Hayes Industrial Estate Preferred Industrial Location, and encouraging heavy industrial / large scale uses on the site, such as a recycling centre, a distribution facility or a renewable energy installation. The document states that in the case of significant trip generating development, mitigation will be sought for the widening of North Hyde Road Bridge.



SECTION 9: PLANNING CONSIDERATIONS

9.1 There are a number of key planning considerations relevant to determination of the application. These are considered in turn below.

a) **Compatibility with Policy**

i) Proposed Land Use

9.2 The application proposals, to redevelop a vacant brownfield site to facilitate the recycling of inert construction / roadwork material and street gully waste, which will then be processed to generate asphalt, secondary aggregate and sub-base construction products on-site, fully accords with the Government's core planning principles set out within the NPPF, to proactively drive and support sustainable economic development and the transition to a low carbon future, through the re-use of existing resources.

9.3 The London Plan carries substantial weight for the purposes of decision making and its policies promote sustainable development and transport. It encourages the re-use and recycling of materials and supports the use of depots in areas designated for industrial / employment uses, including Preferred Industrial Land (PIL), in which the application site is located. The application proposals accord with the relevant policies and will allow for the recycling of 300,000 tonnes per annum of extracted roadwork material, which is likely to otherwise be sent to landfill. The site falls within an industrial/ employment area and it is proposed that material will be moved by road, which is currently the only means of access to the application site. Ongoing works are continuing to assess the feasibility of transporting some material in the future by the adjoining canal. However, this does not form part of this planning application. Regardless of this, the very principle of the proposals is to maximise sustainability, through the reuse of recyclable materials.

9.4 The WLWP identifies the former Powergen site as a proposed new site for a waste management facility. The WLWP, *inter alia*, encourages sustainable waste management and the use of on-site recycling. The emphasis of the WLWP is, of course, for a commercial waste management facility, rather than a privately owned and operated facility, such as that now proposed. However, the fundamental



principle, that the application site possesses the correct characteristics to be used for for a waste / recycling use, nonetheless applies.

- 9.5 As discussed within Section 5, the proposals allow for an aggregate recycling plant, gully waste recycling plant and an asphalt production plant, together with ancillary facilities, to be located on what is currently vacant brownfield land. By locating these separate elements on one site, the need for further movements are minimised as the site provides a complete range of services and products. Material to be recycled can be taken to the site where it will be processed into a reusable end product. This centralised facility will minimise movements to and from a range of different existing facilities (detailed in the following section), and, crucially, will also prevent the need for FM Conway vehicles to make journeys across Greater London to the applicant's existing facilities at Dartford and Erith. This is, again, a fundamental principle supported by all levels of Planning Policy, as development is pushed to become increasingly sustainable, minimising use of the highway network wherever possible.

ii) Compatibility of Proposal and Surrounding Uses

- 9.6 The UDP and emerging Hillingdon Local Plan Part I make specific reference to the impact of any development at the application site having regard to the Grand Union Canal and surrounding heritage assets. The Council seeks to protect these assets by conserving buildings and features related to the canal, retaining existing leisure moorings, and preserving and enhancing the conservation area and the listed structure within.
- 9.7 Due consideration has been given to the proximity of the Bulls Bridge Conservation Area and the grade II listed Bulls Bridge. The layout of the proposals has evolved, and the size of buildings minimised in order to ensure the character and appearance of the Conservation Area is respected. Indeed, as discussed in the Townscape and Visual Impact Assessment, and the Design and Access Statement, the proposals relate sensitively to the surrounding heritage assets, including the Grand Union Canal by enhancing the acoustic protection and landscaping.
- 9.8 Over and above the visual appearance of the proposals, the applicant also proposes to use the latest available technology to minimise noise and dust generation. This is in line with the policies set out at National, Regional and Local level, all of which seek to ensure that industrial proposals can sit comfortably in their surroundings and minimise environmental impacts.



- 9.9 The measures proposed involve enclosing plant in acoustically clad structures, which can then be finished in any colour. In this case, it is proposed to use 'goose wing grey', together with FM Conway's green. This approach has the combined benefit of enhancing the overall appearance of the development, together with enclosing the various pieces of plant and equipment. This ensures there is a uniform appearance across the site and views onto the site are of single, warehouse-like structures, which share the same characteristics as the buildings in the vicinity.
- 9.10 Over and above the attenuation measures, extensive acoustic and air quality mitigation measures will be incorporated. These include, for example, installing dust suppressions systems around the site (to dampen down the material and hard surfaces as required), together with the installation of a significant acoustic barrier treatments around the perimeter of the site.
- 9.11 The proposals compliance with all levels of planning policy provides a strong case for the grant of planning permission. Indeed it is government guidance that there is a legal requirement for planning decisions to be taken in accordance with the development plan unless there is a material consideration to indicate otherwise. Having established the full compliance of the proposals with national, strategic and local plan policy the following sections consider other material considerations relevant to the determination of this application.

b) Redevelopment of Vacant Brownfield Land

- 9.12 This application comprises a key example of the practical application of the London Plan and Hillingdon's local policy documents. The policy context of these documents has been fully set out in previous sections of the report. The NPPF also confirms that the Government encourages the effective use of land by utilising brownfield land.
- 9.13 Since the previous use ceased, the site has been cleared and approximately three metre high bunds have been formed around the perimeter of the main site. The centre of the site, within the bund, has been predominantly levelled and some light scrub vegetation remains.
- 9.14 The site has been vacant for a number of years, and has been contaminated for a long period of time - most probably due to its former use as a creosote works and a power station - and this is discussed within the Ground Conditions Assessment and Land Remediation Strategy Report. The current proposals therefore provide an



opportunity to redevelop the site and bring it back into use, whilst managing any contamination.

- 9.15 As Section 4 sets out above, there have been a number of permissions at the site. The most recent permission (ref: 13226/APP/2001/849 approved on 18 November 2008) for the erection of buildings for use within classes B1(c), B2 and B8, which was, we understand, not implemented for viability reasons. The current application provides a real opportunity to ensure the viable redevelopment of the site. It is the only vacant piece of land along North Hyde Gardens, so redevelopment to provide a sustainable recycling facility and asphalt plant, which is in line with the aspirations of all levels of planning policy, should be encouraged.

c) Suitability of Site

- 9.16 As discussed in Section 2 of this report, FM Conway seeks to expand their business into the western sub-region of London, as it is already established in south east London. The former Powergen site has a number of key characteristics which make it particularly attractive in general terms for the use as an aggregate recycling facility and asphalt production plant.
- 9.17 One of the main positive attributes is the proximity of the site in relation to the road network, which makes the site highly accessible and will allow for the easy movement of materials. Given that a substantial amount of the material to be recycled will be collected from roadworks, and then brought to the site by HGVs, good access to the road network is imperative. Once the material has been processed through the aggregate recycling plant, gully waste recycling plant and asphalt production plant, the onward distribution will be by road.
- 9.18 Beyond the benefit of good access to the local area via the existing links to the road network, another positive attribute of the proposals is the significant reduction in cross-London movements to and from FM Conway's existing facilities. Indeed, the application site will provide a localised facility - providing all services in one location - for contracts on the west side of London.
- 9.20 The fact that the site is surrounded largely by industrial uses, located within the heart of a Preferred Industrial Location, and has the potential to be intensively used is a key benefit and attraction of the site. It is rare in intensively developed urban areas to identify sites which share the same characteristics as adjacent uses. There are no



residential properties, and previous permissions, including the most recent consent for industrial / warehousing uses, considered that the proposals would not give rise to any significant amenity issues.

- 9.21 The size of the site (3 hectares) is also one of the main attractions for FM Conway. In order for the operation of the recycling plant to be viable, and to meet FM Conway's sustainability credentials, a single site of this size is required in order for the company to perform their primary function of recycling, together with the production of asphalt and sub-base products for onward sale and distribution. By locating all facilities on one site, the sustainability and efficiency of the operation is dramatically increased.
- 9.22 The proposed development will provide the most sustainable, economic and efficient way of processing the recyclable material within Greater London, and will limit the need for cross-London freight movements. FM Conway aspire to expand their business in line with growing market demand for recycled aggregates, and the proposed development will allow the company to compete whilst providing their clients – which are predominantly Local Authorities – with a sustainable, economic and environmentally beneficial operation.

d) Environmental Benefits

- 9.23 The application proposes a highly sustainable form of development, where the primary focus is the recycling and re-use of construction / roadwork material. This will significantly limit the amount of material being transferred to landfill or waste sites. Indeed, FM Conway's operational strategy is '*zero to landfill*', as set out in the company brochure, '*Zero to Landfill by 2012*', (attached at Appendix 2).

APPENDIX 2

- 9.24 Reference has already been made to the growing importance of using recycled aggregate and materials. Local Authorities and developers are under increasing pressure to demonstrate the means by which their proposals will meet sustainability objectives. The use of materials such as recycled aggregate and concrete, which are processed on-site, plus the re-using of water collected from the gully waste recycling facility, also on-site, ensures clients will be provided with the most sustainable products available.



- 9.25 The siting of the facility on the west side of London will also mean that vehicles can be based at the site and movements localised. This will prevent cross-London movements, significantly reducing overall vehicle emissions.
- 9.26 The fact that this sustainable process can be secured, without a detrimental impact on the immediate environment, is also a strong positive element to the proposals. The supporting technical documents demonstrate that, with suitable mitigation, attenuation and effective site management, environmental impacts can be minimised, ensuring there is no significant adverse impact on the amenity of occupants or users of the surrounding area, or indeed, on habitats and wildlife.

e) Employment

- 9.27 As detailed in Section 5 in the description of the development, the proposals will result in the creation of 79 full time jobs, including those working on site, company lorry drivers, and Term Maintenance employees.
- 9.28 This is of particular relevance bearing in mind the recent announcement earlier this year that the Nestle factory (further to the west along North Hyde Gardens) is to close in 2014, with the loss of approximately 230 jobs (*The Telegraph*, 16 January, 2012).

f) Impact on Landscape and Ecology

- 9.29 The application site is located within an industrial area of west London, and large scale commercial and industrial uses are prevalent. However, it is also adjacent to the Grand Union Canal – Paddington Branch. Protection of this valuable asset, which is of ecological, heritage and leisure value, is a key consideration for the applicant, and the design proposals have evolved to reflect this.
- 9.30 Indeed the treatment of the eastern boundary of the site, which abuts the Conservation Area, will incorporate a significant set back from the boundary line, to leave sufficient space for a Root Protection Area (RPA) to ensure the existing rows of trees, either side of the site boundary, are retained. In addition to retention of the trees, extensive planting and landscaping is also proposed, which includes a strategy for the site boundary, together with various mitigation and attenuation measures across the site. This will ensure there is no adverse impact on the ecological or landscape value of the adjoining land, or indeed the application site. Further details



of the measures proposed are provided in the various technical reports supporting the application.

g) Impact on Grand Union Canal and Heritage Assets

- 9.31 The users of the canal and towpaths, including the owners / occupants of the leisure moorings, which are located along the western boundary of the canal, have been acknowledged through the design process. There is evidence available of the leisure status of these moorings.
- 9.32 Firstly, we understand that the Canal and River Trust let the moorings on a leisure basis only. There is evidence of the leisure rates online.
- 9.33 Secondly, we have found no evidence of any planning applications seeking a permanent residential use of the moorings.
- 9.34 Despite this, the application proposals will have no adverse impact on the amenity currently enjoyed by the occupants of the leisure moorings, or indeed other users of the canal and towpaths. Details of the noise and air quality mitigation measures to be incorporated are provided in the accompanying reports.
- 9.35 Consideration of the potential effects on the adjoining Bulls Bridge Conservation Area, and the grade II listed Bulls Bridge, is also provided in the accompanying Heritage Statement submitted with the application. This concludes that the proposals will enhance the industrial heritage of the area, providing a natural sense of enclosure to the canal and towpaths. The proposals will therefore be beneficial overall, with the only direct effect being a view of the tallest part of the application proposals from Bulls Bridge. However, this view must be seen in the context of all views, up and down the Paddington branch and from the Grand Union Canal. The application site is, in fact, enclosed from most public viewpoints.



SECTION 10: EXISTING FACILITIES SERVING THE AREA

a) Pattern of Existing FM Conway Facilities Serving the Area

- 10.1 FM Conway currently has two facilities serving London: Dartford and Erith. These comprise:
- Dartford – In January 2001 the main offices, workshops and yard was centralised and relocated to a 14 acre site next to the A2 in Rochester Way, Dartford Heath. The Dartford facility operates a state of the art gully waste recycling plant, together with an aggregate recycling plant.
 - Erith– This site opened in 2011 and accommodates a river served aggregate jetty and storage facility, and asphalt production plant, which is considered one of the most technically advanced plants in Europe;
- 10.2 Both sites are well placed to serve FM Conway contracts in the south east London area, but because the sites provide different facilities and functions, vehicles will often visit both sites, depending on the contracts they are serving and the materials or processes they require.
- 10.3 In terms of serving the west London area, these existing facilities are less well placed. Whilst they are currently used for contracts across Greater London, this is not the most sustainable or practical solution, as the company looks to expand into other areas of London. These existing facilities will therefore be complemented by the application proposals, providing a superior basis for serving Greater London as a whole.
- 10.4 The provision of an additional facility which is centred within an expanding market, and which combines all processes onto one site, will deliver environmental and sustainable benefits to both the applicant and customers.

b) Pattern of Existing Asphalt Producers and Aggregate Recyclers in the Area

- 10.5 To our current knowledge there are a limited number of asphalt producers and aggregate recyclers within the area, which include:



OPERATOR	PLANT ADDRESS
Tarmac	Pump Lane, Hayes
Days Aggregates	Transport Avenue, Brentford
Brett Aggregates	Hithermoor Quarry, Staines
Bardon Aggregates	Thorney Mill Road, West Drayton
London Concrete	Colnbrook By Pass, Colnbrook

10.6 Whilst this table demonstrates that there are competitors locally, they do not provide the comprehensive range of sustainable services that FM Conway will provide. Indeed no other facility, or operator, offers the unique blend of 'closed loop' recycling, including procurement (from Local Authority sites), recycling, manufacturing and reuse (predominantly at other Local Authority sites). The application proposals also have the benefit of reducing HGV road miles in the west London area as vehicles need only visit a single site.

10.8 Due to the demand from clients for greener solutions and the considerable success of the company's recycling efforts, FM Conway continues to grow both its Term Maintenance and Civil Engineering divisions. To meet the demand for recycling, the application site will feature a 'one-stop shop' range of services to accommodate all customers' requests.

c) Pattern of Existing Term Maintenance Services Locally by Borough

10.9 West London is served at present by a range of existing term maintenance services, which include self-delivery via a Direct Labour Organisation in Hillingdon, Enterprise Mouchel in Harrow, part Direct Labour Organisation and part contractor (Eurovia) in Hounslow, Murrill Construction Ltd in Ealing and range of contractors in Brent.

10.10 In our opinion there are limited facilities and there is therefore significant scope to enhance the level of services west London currently receives.



SECTION 11: CONCLUSIONS

- 11.1 Planning permission is sought for the redevelopment of the application site to accommodate an aggregate recycling and processing plant, gully waste recycling plant, asphalt plant and storage facility, and term maintenance depot, with ancillary offices, structures and facilities, car and lorry parking, regrading, and landscaping.
- 11.2 The application site is currently vacant brownfield land which has been cleared and vacant for over 10 years. The site is currently serving no purpose. It is allocated for industrial / business uses in both Regional and Local planning policies, including the most recent policy document – the Draft West London Waste Plan – which identifies the site as being suitable to accommodate a future waste management facility. It is, therefore, ideally suited for the application proposals which are fully supported by planning policy.
- 11.3 The site has a long history of heavy industrial uses, including a creosote works and a power station. The most recent planning permission for the site, in November 2008, permitted use of the site for a range of industrial uses, and included the construction of large scale warehouse buildings.
- 11.4 The proposals provide an opportunity to bring this unused land back into active use, consolidating the range of services offered by the applicant at their existing facilities. Over and above the strong environmental benefits offered by the proposed processes, the added benefit of the proposals are that they will significantly reduce HGV road miles.
- 11.5 The applicant, FM Conway, is fully dedicated to the recycling and reuse of materials wherever possible and has a proven track record, demonstrated by the standards of its operations at Dartford and Erith, and the long term contractual relations it has with several London Boroughs.
- 11.6 The site layout and design of the application proposals has evolved to accommodate a range of considerations, including the setting of the nearby heritage assets, the amenity value of the Paddington branch of the Grand Union Canal, and other environmental considerations. The development of the proposals and its assessment have taken into account these land uses and have shown that the proposals can co-exist in terms of environmental and amenity considerations.



- 11.7 In conclusion, there are clear and wide-ranging benefits which will arise from the application proposals, including the meeting of key sustainability objectives and the redevelopment of a large brownfield site. The applicant is confident that agreement can be reached on other matters relevant to consideration of the application, throughout the determination period, and, on this basis, the proposals can be fully supported.



APPENDIX 1

MAP OF LONDON BOROUGHES WHERE FM CONWAY CURRENTLY OPERATES



APPENDIX 2



FM Conway has become the UK's leading Highway recycling company, through the long term commitment and drive of Michael Conway, and a desire to deliver the most sustainable service possible for the company's clients.

In July 2010, Michael publically committed FM Conway to



and we are achieving over 95% in early 2010.

FM Conway Recycling Facility

Key Fact

FM Conway recognises that construction operations have significant impact on the environment.

We have addressed these impacts through innovative solutions demonstrated throughout this document, and it is that which separates us from our competitors.

Our Recycling Facility at Dartford, the most technically advanced facility in Europe, has the capability to

recycle over 200,000 tonnes of highway arisings

that we excavate from sites and bring back into our yard each year.

Materials are kept segregated on site and brought back to our site at Dartford where they are placed onto separate stock piles to await processing into sub base materials and converted into concreting aggregates and base course materials that comply with the WRAP quality protocol.

We also recycle the waste from over 1,000,000 Gully Cleansings, recycling aggregates, sand, hydrocarbons, organics, scrap metals and water they contain.



Arisings brought back over the weighbridge into our recycling facility



Arising fed into our static crusher housed in an acoustic silenced building





Processed through our comprehensive wash plant and screening plant

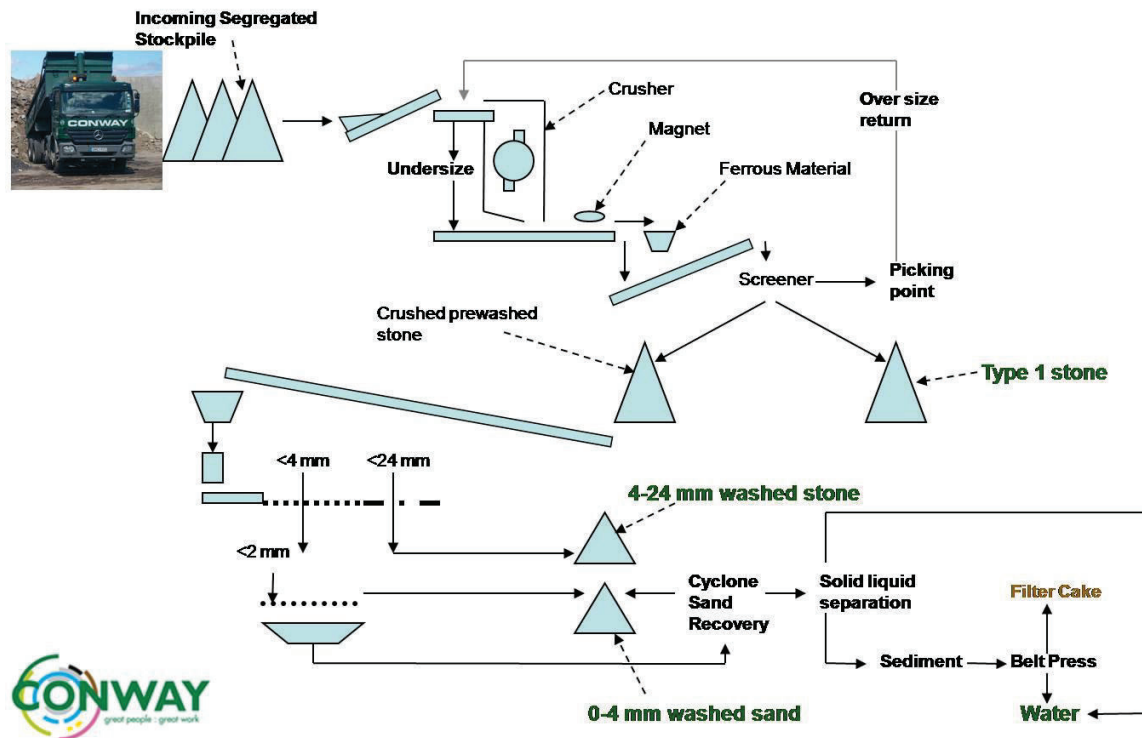


Output as Type I, and Concreting Aggregates



Delivered in Volumetric Concrete Mixers and Grab Loads of Aggregates

Aggregate Recycling and Wash Plant Operation



Our facility at Dartford also houses the company's unique Drainage Treatment Plant which is capable of

treating 30,000 tonne of drainage waste per year

and produces water for our aggregate washing and concrete production as well as providing a percentage of the fine aggregates via our wash plant.

We recycle over 9 million litres of water each year.

Recycling Gully Waste – FM Conway operates a state of the art Gully Waste Recycling Plant at our Dartford depot, which as part of our overall recycling facility achieves a 95% recycling record for everything that comes over the weighbridge. Annually we cleanse over 1 million gulleys across London, the South East and the East Midlands.

The company's unique Drainage Treatment Plant is designed to process and treat drainage waste and to render its constituents safe and suitable for reuse in a variety of applications. Previously all drainage waste was disposed of in landfill but now less than 5%, mainly litter, necessitates this kind of disposal, and we are actively working on recycling solutions for this minor fraction too.

The plant is capable of treating 30,000 tonne of drainage waste per year, thus diverting it from a rapidly reducing number of landfill sites that are licensed to accept it. This innovative solution to the treatment of drainage waste not only reduces the need for long distance transportation to the nearest special waste site but also enables the recovery of valuable aggregates, organics, hydrocarbons and even scrap metal.

The plant also performs another valuable function. Intrinsically linked to the Aggregate Washing Plant (AWP), water required for washing is continually recycled and cleansed as it flows through the Drainage Treatment Plant (DTP) and is then pumped back to the AWP for repeat use. Drainage waste is often up to 50-60% water and this together with a unique system of rainwater collection from the entire site helps to maintain the volume of water needed to satisfy the demand of the AWP, even through periods of hot weather.

The DTP automatically separates all of these constituents. Sand is recycled for use in concrete production. Organics and silt are pressed into a cake format via a system of belt-presses for use in topsoil. Hydrocarbons are recovered and can be used to enhance the calorific value of incinerator fuel. Scrap metal is transferred for scrap. Hypodermic needles are identified and removed for disposal as medical waste. Water is cleansed beyond current legislative levels and recycled within the DTP and AWP system. Surplus water can be utilised in drain jetting activities.



The company believes that the system on which its DTP is based is the only environmentally acceptable method of drainage waste treatment available today. Unfortunately there are still some clients that do not share that principal and continue to landfill gully waste.

It is particularly suited for locations in the urban environment where other known settlement techniques are precluded. The main benefits of this system are:

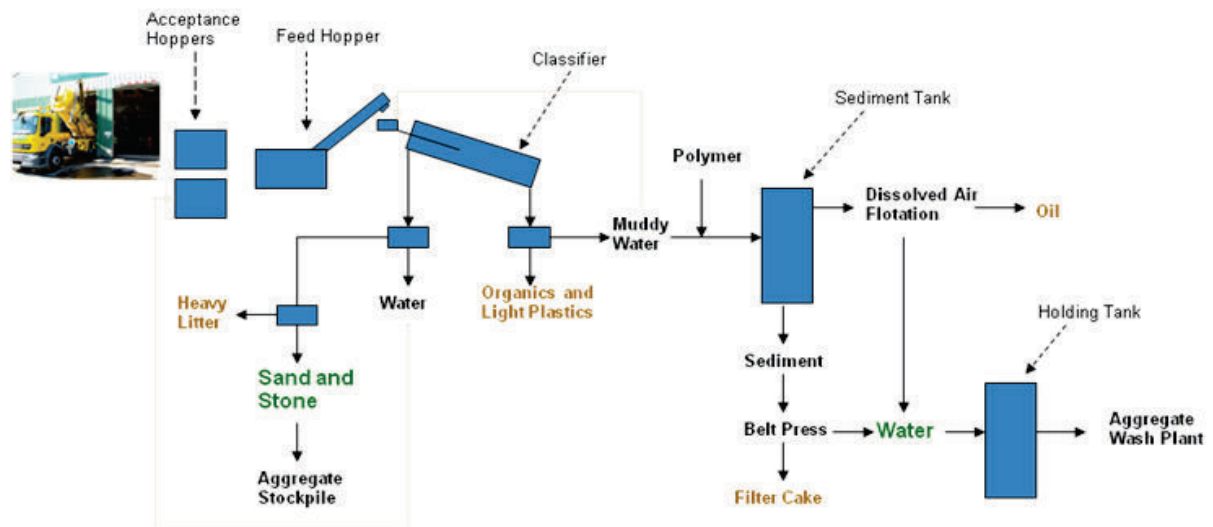
- Environmentally preferred solution to the problem of drainage waste

- Thoroughly cost effective by greatly reducing transportation costs
- 95% of the waste deposited in the DTP is reused facilitating 'Closed Loop Recycling'
- Designed to be virtually silent in operation its location is not site sensitive
- Fully bunded and enclosed the plant is safe and poses no risk of leakage into ground water or water courses
- Improved utilisation and efficiency of cleansing fleet allowing the disposal of drainage waste at any time throughout the working day
- Special on site storage and collection service available for remote locations

This is the only plant of its kind in the UK

and we always welcome the opportunity to demonstrate how it works to prospective clients. It is briefly outlined in the following illustration.

Drainage Treatment Plant Process Flow Diagram



Asphalt Recycling

We have recently invested over £10million in a new “state of the art” asphalt plant at Erith, which came on stream during June 2010, and produces the “greenest” asphalt in the UK, utilising recycled aggregates from our Dartford recycling operation and asphalt plantings.

This plant has been designed to incorporate all of the latest savings in energy when in operation, and is able to utilise alternative fuel technology for drying/heating aggregates.

It operates at low temperatures, offering materials both to British and European Standards and to NHSS 14, as well as cost effective recycled solutions.

Wherever practical on site, we plane asphalt from highways that are to be resurfaced, and these plannings are returned to and stockpiled at Erith for use in recycled mixes.



Due to the demand from our clients for greener solutions, and the considerable success of our recycling efforts, FM Conway continues to grow both its Term Maintenance and Civil Engineering divisions.

To meet the demand for recycling, a further site has been acquired at Bulls Bridge, North of Heathrow Airport, where the company plans to build a complete recycling facility that will incorporate all of the above facilities.

As we have learnt much from our existing operation, we will work with our plant manufacturers to ensure that this new facility will have an even greater capacity for aggregate and gulley waste than currently at Dartford, and an identical plant for asphalt to Erith all on one site. This will help to deliver even lower transport costs and CO₂ emissions.

Award Winning Environmental Performance



AWARD FOR ENVIRONMENTAL SUSTAINABILITY IN THE HIGHWAYS SECTOR

HIGHWAYS MAGAZINE
EXCELLENCE
AWARDS 2010

Criteria:

Open to partnership initiatives and /or products that can demonstrate consideration of sustainability on the environment such as: carbon footprint reduction; local environmental benefits; sustainable material use; reduction of Co2; community liaison and consultation.

Sponsored by



HIGHWAYS MAGAZINE
EXCELLENCE
AWARDS 2010

**Winner: FM Conway Ltd –
Closed Loop Highway Waste Management**



Judges comment:

"This is a comprehensive system for recycling – demonstrating that recycling is embedded in the ethos of the company. A very good benchmark for the industry."

FM Conway delivers what it calls "Closed Loop Highway Waste Management" with a Waste Not, Want Not approach.



Short Listed:

Leicestershire County Council & Leicester City Council – Enderby Park & Ride



Enderby Park and Ride is a £9.2 million joint venture setting a new standard of environmental best practice for park and ride schemes. It boasts a low-energy terminus building using ground source heat pump technology and extensive SuDS.

Judges comment:

"A project which demonstrates clear commitment to sustainability with a positive link between sustainable construction and travel."



Short Listed:

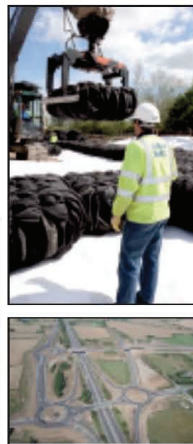
Balfour Beatty Major Civil Engineering – A421 Improvements M1 Junction 13 to Bedford



Balfour Beatty's A421 Improvement M1 Junction 13 to Bedford demonstrates fervent commitment to the preservation and enhancement of the local environment.

Judges comment:

"A project which demonstrates a wide appreciation of the whole sustainability agenda."



Highways Magazine Excellence Awards 17

APPENDIX 3

Site Report for 244

General Information

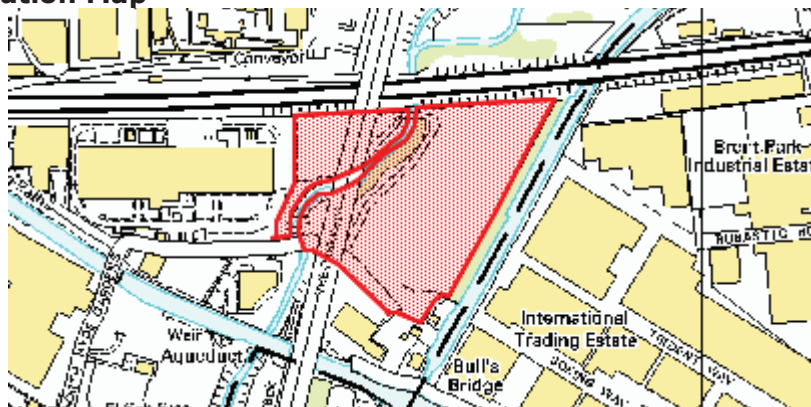
Borough: Hillingdon
Area: 4.3

Description:

Yeading Brook, Former Powergen Site,
Bulls Bridge.

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London Borough of Brent: 100025260
London Borough of Ealing: 100019807
London Borough of Harrow: 100019206
London Borough of Hillingdon: 100019283
London Borough of Hounslow: 100019263
London Borough of Richmond: 100019441
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Location Map



Score & Ranks

Show Stoppers

SSSI	False
SPA	False
SAC	False
RAMSAR	False
NNR	False
Int & Nat Historic Importance	False
Greenfield & Flood Zone 3b	False
Area	False
Crossrail Safeguard	False
All	False

Screening Criteria

Protected Views	5
Greenbelt, Open Space & MOL	5
Flood Zone	1
SPZ	5
Sustainable Transport	6
SRN	10
PROW	5
Local Conservation Area	5
Nature Conservation	5
Locally Important NCA	5
Archaeological Site	5
Land Stability	1
HE and Built Heritage	1
Total	59

Manual Screening Criteria

Site Configuration	3	The site is large and located under the A312, with a river cutting across the north west corner.
Existing Use /Buildings On Site	5	The site is brownfield and undeveloped at present.
Proximity To Residential Areas	10	The site is approx. 400m from the nearest residential properties which is beyond a further industrial estate.
Vehicle Routing	10	Access to the A312 is approx. 600m away in an industrial setting.
Visual Intrusion	5	Development on site is unlikely to result in an increase in visual intrusion as the site is well screened.
Potential for co-location	5	The site is large enough for co-location.
General	0	The existing building heights on site are approx. 8-12m. The site is surrounded by industrial estates to the east and west, by the railway to the north and the canal to the south.
Total	38	
Grand Total	97	

The site is proximal to waste arising from the following borough/boroughs:

Hillingdon
Hounslow