# Planning Statement

Construction and use of a waste transfer station and provision of site office, container storage, vehicle parking and ancillary infrastructure for a temporary period

**Old Coal Depot, Tavistock Road, West Drayton, London Borough of Hillingdon**

on behalf of

PUNJAB SKIPS

May 2024

by

Heatons

Planning Environment Design

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# 1 INTRODUCTION

## 1.1 Background

1.1.1 This planning application, submitted on behalf of Punjab Skips Limited (the Applicant), proposes the construction and use of a new temporary building for the screening, sorting and bulking of skip waste on land at the Old Coal Depot, Tavistock Road, West Drayton in the London Borough of Hillingdon. The proposed development would be temporary for a period of 5 years.

1.1.2 The Applicant currently operates a skip hire business on land within the Old Coal Depot site. The business has operated on this site since December 2021 and accepts a mix of household, commercial, industrial and construction and demolition waste from local households and businesses. The waste activities are currently undertaken under an exemption from Environmental Permitting which allows the bulking of limited quantities of materials with no sorting.

1.1.3 Discussions have been held between the Applicant and the landowner, Network Rail, regarding the potential to relocate from the existing site. During the course of these discussions, Network Rail identified a parcel of land within the north east of the Old Coal Depot site, which was considered preferable for waste operations due to its larger size and concrete hard surface. This parcel of land is the subject of this planning application (the application site). It is proposed that, should planning permission be granted, the Applicant would move from their current site to the application site.

1.1.4 This planning application seeks permission for the construction and use of a new building which would be used for the delivery, storage, processing (e.g. sorting and screening) and bulking of skip waste for a period of five years.

1.1.5 This supporting Planning Statement should be read in conjunction with the accompanying application forms, certificates and supporting documents/drawings. These include:

- Site Location Plan;
- Planning Application Boundary;
- Site Plan;
- Site Layout Plan;
- Elevations;
- Sound Level Assessment (Sharps Redmore, November 2023);
- Air Quality Assessment (Redmore Environmental, December 2023)

- Landscape and Visual Technical Note, November 2023); and
- Transport Statement (Cora IHT, November 2023).

## 1.2 Applicant

1.2.1 Punjab Skips Limited is a family-run skip hire business. The company has been operating since 2003 within the skip hire and recycling industry. They supply skips for small and large scale projects and aim to divert as much waste away from landfill as possible, with a current recycling performance of over 90%.

1.2.2 The company has a proven track record for fast delivery and efficient service at cost effective prices. This has led them to become a leader within the industry. In recent years they have made a conscious effort to reduce their carbon footprint by replacing all older vehicles with new Euro 6 standard lorries.

# 2 SITE APPRAISAL

## 2.1 Site Location

2.1.1 The site is located within the Old Coal Depot, off Tavistock Road, West Drayton which is within the London Borough of Hillingdon. The site is centred on National Grid Reference TQ 0552 8025.

2.1.2 The site lies in the west of Greater London, approximately 25km from central London and approximately 1.4km east of the M25. Junction 4B of the M4 junction with the M25 lies approximately 1.6km to the south west of the site.

2.1.3 The proposed site for the waste transfer station amounts to approximately 2,000m$^2$. However, it is necessary to extend the planning application boundary to the nearest public highway (Tavistock Road) and the total planning application area therefore amounts to 6,012m$^2$ (0.6 hectares).

## 2.2 Site Description

2.2.1 The Old Coal Depot site is owned by Network Rail and is currently in use by several businesses which are primarily industrial in nature, including a number of waste management operations (cardboard, window and wood recycling businesses), a scaffolding company and haulage business. Parts of the site are also used for vehicle parking. The planning application site lies in the north of the depot.

2.2.2 The site has previously been used by Powerday plc for waste management purposes although all equipment and infrastructure has been removed and the site is currently vacant. Powerday currently operates a temporary Civic Amenity Site on land in the north east of the wider depot, which operates on Saturdays and Sundays only.

2.2.3 The site is accessed from Tavistock Road approximately 425m to the east-south east of the site. An internal access road routes through the Old Coal Depot and provides access to separate businesses located within the site.

## 2.3 Site Setting

Surrounding Area

2.3.1 The site is located within a wider site known as the Old Coal Depot which is currently in industrial use by multiple businesses. The area immediately surrounding the application site is therefore industrial in nature.

2.3.2 The plots to the immediate east and west of the site are both currently vacant. The plot to the south of the site is occupied by a scaffolding business. The new Elizabeth

London Underground line lies approximately 95m to the south of the site with a rail sidings and West Drayton aggregate depot, which is operated by Hanson, located in between. A railway line lies close to the northern boundary of the application area and the wider Old Coal Depot site.

2.3.3 Tavistock Road lies approximately 225m to the east at its closest point.

2.3.4 The closest residential properties are located approximately 140m to the south of the site, beyond the Elizabth Line, and 140m to the east of the site in Merrivale Mews. New housing is being built to the north east of Tavistock Road approximately 350m east-south east of the site, although the development plot (proposed for future development) is approximately 270m at its closest point.

2.3.5 The closest public rights of way (PROW) to the site are Colne Valley Walk which runs to the west and north of the Old Coal Depot site approximately 230m to the west of the application site at its closest point, Bridleway Y1 which lies approximately 200m to the north and footpath Y26 which runs adjacent to the Grand Union Canal approximately 620m to the north. A walk known as the London Loop runs alongside the Grand Union Canal approximately 500m to the east of the site.

2.3.6 The site does not lie within the London Green Belt. However land to the north and north west, adjacent to and north of the railway line, is designated as Green Belt.

Water Environment

2.3.7 Fray's River lies approximately 110m to the east of the site and the Grand Union Canal lies to the north and east of the site, approximately 450m from the site at its closest point. The River Colne lies approximately 430m to the west at its closest point. Bigley Ditch lies to the north west and south west of the site. A number of waterbodies associated with Thorney Weir Fishing Club Lake lie to the north and north west of the site with The Mets Lake beyond.

2.3.8 According to the Flood Map for Planning website, the site lies within Flood Zone 1, which is land at the lowest risk of flooding.

2.3.9 The site does not lie within a groundwater Source Protection Zone.

Nature Conservation

2.3.10 There are no statutory nature conservation sites within 2km of the site. However land approximately 100m east of the site is designated as a 'Nature Conservation Site of Metropolitan or Borough Grade I Importance'.

Heritage

2.3.11 There are no designated heritage assets situated within the site boundary. There is one Scheduled Monument within 2km of the site. 'Two concentric ditches showing as crop marks at Thorney' is located approximately 1.5km to the south west of the site.

2.3.12 There are a number of listed buildings and structures within 2km of the site, the closest being the Grade II listed 'Offices of the Valentine Varnish and Lacquer Company' approximately 350m to the south east and the 'De Burgh Arms Public House' and 'The Railway Arms Public House' approximately 480m from the site.

2.3.13 Within the adopted Hillingdon Local Plan Part 2 Policies Map (January 2020), the site is located within a wider area designated as an 'Archaeological Priority Zone'.

## 2.4 Planning History

2.4.1 Through a search of the Local Planning Authority's planning website, no valid planning permissions have been identified for the application site.

2.4.2 Planning permission 18736/APP/2019/2343 was granted on 21st October 2019 for land to the east/south east of the application site for '*Proposed use of the site to provide a Civic Amenity facility at weekends only (Saturdays and Sundays – 9am to 5pm) accommodating public recycling area with a circular access arrangement, associated waste drop zones and container storage and installation of palisade fencing with gates for a five year period*'. The application was submitted by London Borough of Hillingdon through its Capital Programme Works Service.

2.4.3 A new large scale residential development has been granted planning permission on land to the east of the Old Coal Depot, which is the former 'Comag' site. This is Site Allocation SA38 within the Hillingdon Local Plan and is partially built out with two plots nearest to Tavistock Road likely to be developed in the near future.

# 3 DESCRIPTION OF DEVELOPMENT

## 3.1 Existing Situation

3.1.1 The application site is currently vacant.

3.1.2 Punjab Skips Limited is currently operating a small scale skip business on land within the south of the Old Coal Depot site. The company wishes to expand its business and is therefore currently seeking a longer term and larger site within the local area. However, a suitable site has not currently been identified.

3.1.3 As an interim measure, discussions have therefore been held with the landowner, Network Rail, regarding a potential move from the current site to an alternative site within the Old Coal Depot. Network Rail indicated that the application site in the north of the Old Coal Depot may be more suitable for the skip waste operations due to its larger size and concrete hard standing surface.

## 3.2 Proposed Development

Site Layout and Proposed Building

3.2.1 The proposed layout of the site is shown on ' Site Layout Plan'. The site would be accessed from Tavistock Road using an existing access road which runs through the Old Coal Depot and provides access to a number of existing businesses. The site would be secured by an existing concrete block wall with entrance gate on the southern boundary.

3.2.2 This application proposes the construction of a waste transfer station building which would accommodate the waste transfer operations. The proposed building would be located in the north of the application site, as shown on the Site Layout Plan. The waste transfer station building would have a total height of approximately 11.5m to the roof ridge (10m to the eaves) and an approximate footprint of 30m length by 30m width (i.e. 900m$^2$). It is proposed that the building walls and roof would be constructed of 0.4mm profiled steel cladding. The colour of the building would be discussed and agreed with the Planning Authority.

3.2.3 The waste transfer station building would be open fronted on its southern elevation with enclosed sides on the western, eastern and northern elevations. The open front would provide high levels of natural light.

3.2.4 The proposed development would be of a temporary nature for a period of 5 years.

3.2.5 A site office and welfare cabin would be located in the south eastern corner of the site. The cabin would be stacked on a storage container and would have an overall height of approximately 5.1m.

3.2.6 In order to collect foul water from the toilet and sink within the site office, there would be a need for an above ground foul water treatment tank on site (similar to a cesspool). This would be connected to the office via pipework and would be located adjacent to the office at the location shown on the Block Plan.

**3.3 Proposed Operations**

3.3.1 The site would be accessed from Tavistock Road to the south east of the application site. Skip lorries would enter the site and signage would instruct drivers to report to the site office situated in the south eastern corner of the site, adjacent to the site entrance. A banksman would then direct the waste vehicles into the waste transfer station building.

3.3.2 Waste would be tipped onto the floor with the skip lorry lifting equipment and waste would be visually checked for compliance with the site's Environment Permit.

3.3.3 Waste would be sorted within the building using two 14 tonne excavators with selector grabs, which would separate larger items of waste into different sized fractions. Waste may be further sorted using a trommel screen. Ground staff would also manually sort smaller fractions of waste along a conveyor/ picking line where it would be placed into separate containers.

3.3.4 Inert waste, for example hardcore, soils and stone, would be transferred to storage bays within the building using an excavator. Non inert waste, such as plastic, wood, card, metal and mixed waste, would be transferred to a number of 40 yard roll on/off steel containers, which would also be stored within the building.

3.3.5 Waste would be regularly removed from the site in accordance with the requirements of the site's Environmental Permit. Inert waste would be loaded into 8 wheel tipper lorries using an excavator. Non-inert material stored in 40 yard containers would be taken off site by hook-loader lorries.

3.3.6 The site and access road have a concrete hard surface and road sweepers would be used to routinely sweep the site and access road in order to maintain high standards of housekeeping and minimise the potential for mud and debris to be transported onto the public highway.

Mobile Plant and Equipment

3.3.7 The following plant and equipment would be used on site as part of the daily waste management activities:

- 2 x 14 tonne 360$^{o}$ excavators with selector grab attachments; and
- 1 x trommel screen with conveyor (for picking line).

Employment

3.3.8 Punjab Skips Limited currently employs 2 full time operatives, 1 administrator and 8 drivers within the existing waste management site in the south of the Old Coal Depot. If permission is granted for the proposed waste transfer station in the north of the Old Coal Depot, it is proposed that the site would employ 16 direct employees which would comprise 7 site based operatives, 1 administrator and 8 drivers.

3.3.9 The proposed development would therefore result in an additional 5 full time jobs.

Operating Hours

3.3.10 The proposed operating hours for the site are 7am to 6pm Monday to Friday, 8am to 1pm on Saturdays, with no operations on Sundays or Bank/Public Holidays.

3.3.11 The waste transfer station would operate on Saturdays to accept waste and to bulk up sorted materials and load it into waste vehicles. However, no screening of waste would be undertaken on Saturdays (i.e. by using the trommel).

Traffic

3.3.12 The construction phase would take approximately 1 month and would result in approximately 4 HGVs (i.e. 8 two-way HGV movements) entering and leaving the site during this period. An excavator, which is already being used on the Applicant's site in the south of the Old Coal Depot, would be used for earthworks and would not need to be transported by HGV.

3.3.13 Based on the maximum quantity of waste that would be allowed under the proposed Standard Rules Environmental Permit, (i.e. 75,000tpa), it is calculated that the waste transfer operations would generate approximately 68 skip wagons per day importing waste to the facility. Outgoing waste would generate approximately 23 x hook loaders and 8 x 8-wheel tippers per day. The proposed development would therefore generate a total of 99 waste vehicles (or 198 two-way vehicle movements) per day.

3.3.14 Notwithstanding the above calculations, it is anticipated that the actual throughput of the facility would be lower than that allowed under the Permit, with an average of 73 waste vehicles (or 146 two-way vehicle movements) per day.

3.3.15 All fleet vehicles are Euro 6 standard compliant.

# 4 PLANNING POLICY

## 4.1 Introduction

4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that when determining planning applications, such determination must be made in accordance with the Development Plan unless material considerations indicate otherwise. The Planning and Compulsory Purchase Act 2004 defines the Development Plan as the Development Plan Documents (taken as a whole) which have been adopted or approved in relation to that area.

4.1.2 In reaching a decision on this application the first consideration is therefore whether the proposals accord with the Development Plan. Having done this, it is then necessary to have regard to all other material considerations. Other material considerations include all relevant policy considerations contained in national planning policy and guidance as well as emerging local planning policy.

4.1.3 This chapter of the Planning Statement focuses on the key planning policy considerations including the acceptability of the proposed development.

## 4.2 The Development Plan

4.2.1 The suite of documents that comprise the Development Plan adopted by Hillingdon Council, and of relevance to the application, include:

- The London Plan 2021 (Adopted March 2021);
- West London Waste Plan (Adopted July 2015);
- Hillingdon Local Plan Part 1 – Strategic policies (Adopted November 2012);
- Hillingdon Local Plan Part 2 – Development Management Policies and Site Allocations and Designations (Adopted January 2020); and
- Hillingdon Local Plan Part 2 – Policies Map (Adopted January 2020).

<u>London Plan 2021</u>

4.2.2 The London Plan 2021 is the Spatial Development Strategy for Greater London and sets a framework for how London will develop over the next 20 to 25 years. The Plan is part of the statutory development plan for London, meaning that the policies in the Plan should inform decisions on planning applications across London.

4.2.3 The London Plan includes waste related policies. Policy SI 7 'Reducing waste and supporting the circular economy' seeks to conserve resources, reduce waste, increase material re-use and recycling and reduce waste sent to landfill through collaboration

between waste planning authorities and the waste industry. The policy sets a number of targets as follows:

1) promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible;
2) encourage waste minimisation and waste prevention through the reuse of materials and using fewer resources in the production and distribution of products;
3) ensure that there is zero biodegradable or recyclable waste to landfill by 2026;
4) meet or exceed the municipal waste recycling target of 65 per cent by 2030;
5) meet or exceed the targets for each of the following waste and material streams:
    a) construction and demolition – 95 per cent reuse/recycling/recovery;
    b) excavation – 95 per cent beneficial use (all inert excavation waste should be sent for beneficial use); and
6) design developments with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.

4.2.4 Policy SI 8 'Waste capacity and net waste self-sufficiency' promotes the sustainable management of waste within London. Part A of the policy states (inter alia):

1) The equivalent of 100 per cent of London's waste should be managed within London (i.e. net self sufficiency) by 2026;
2) New waste management sites should be provided where required; and
3) Environmental, social and economic benefits from waste and secondary materials management should be created.

4.2.5 Part E of Policy SI 8 also states that development proposals for new waste sites, or to increase the capacity of existing sites, should be evaluated against the following criteria:

1) The nature of the activity, its scale and location;
2) Effective implementation of the waste hierarchy and its contribution to London's circular economy;
3) Achieving a positive carbon outcome (i.e. reusing and recycling high carbon content materials) resulting in significant greenhouse gas savings;

4) The impact on amenity in surrounding areas (including but not limited to noise, odours, air quality and visual impact) – where a site is likely to produce significant air quality, dust or noise impacts, it should be fully enclosed;
5) The transport and environmental impacts of all vehicle movements related to the proposals.

4.2.6 Part F of Policy SI 8 states that when planning for new waste sites, or to increase the capacity at existing sites, the following points should be considered:

1) Job creation and social value benefits, including skills, training and apprenticeship opportunities;
2) Local need;
3) Accessibility of services for local communities and businesses.

4.2.7 Policies GG2 'Making the best use of land' and GG5 'Growing a good economy' seek to make the best use of land. Policy GG2 states that to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must (inter alia) enable the development of brownfield land, prioritise sites that are well connected by public transport, maximise opportunities to use infrastructure assets for more than one purpose and plan for the use of sustainable modes of transport.

4.2.8 Policy GG5 'Growing a good economy' seeks to conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners. Whilst the policy principally relates to longer term goals and objectives to support the city's economic development and success, and therefore does not directly relate to temporary development such as that proposed, the policy states that those involved in planning and development must '*plan for sufficient employment and industrial space in the right locations to support economic growth*' and '*recognise and promote the benefits of a transition to a low carbon circular economy to strengthen London's economic success*'.

<u>West London Waste Plan 2015</u>

4.2.9 The West London Waste Plan (WLWP) was adopted in July 2015 and plans for all waste in the Plan area up to 2031. The Plan covers the boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames and the Old Oak Common and Park Royal Development Corporation (OPDC) have joined together to plan for the future management of waste produced in their areas. The WLWP therefore forms part of the development plan for the Old Oak Common and Park Royal Development Corporation.

4.2.10 The WLWP explains that a significant amount of waste is transferred outside of London for treatment and disposal. However the London Plan (latest version 2021) requires that the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026.

4.2.11 The WLWP's vision is '*Over the period to 2031, the West London Waste Plan area will have made provision for enough waste management facilities of the right type and in the right locations to provide for the sustainable management of waste guided by the waste hierarchy to achieve net self-sufficiency and meet the needs of local communities. It will seek to do so, in a progressive manner, whilst protecting the environment, stimulating the economy and balancing the needs of West London's communities'.*

4.2.12 The WLWP has a number of strategic objectives as follows:

1) Identifying sufficient land for the management of the six borough's pooled waste apportionment and to provide for the sustainable management of an amount of waste equivalent to the amount arising within the Plan Area;

2) To ensure that waste is managed as far up the waste hierarchy as possible;

3) To reduce the impact of waste management on climate change by encouraging the use of sustainable transport and new, clean technologies, whilst seeking to locate waste management facilities as close to waste sources as practicable;

4) To ensure that, through appropriate policies, waste facilities meet the highest standards possible of design, construction and operation to minimise adverse effects on local communities and the environment; and to support the key aims and objectives of the Borough Council's Sustainable Community Strategies.

4.2.13 The Plan includes 8 sites which are allocated for waste management use. One allocated site (Rigby Lane Waste Transfer Station) lies within Hillingdon.

4.2.14 Paragraph 6.1.2 of the WLWP acknowledges the London Plan's commitment to sending zero biodegradable or recyclable waste to landfill by 2026. It refers to the 2011 London Plan which anticipated that net self sufficiency would not be achieved until 2029 for London as a whole (the more recent 2021 version considers this should be achievable by 2026). However, the WLWP states that '*in the interim, there would be a gap between the quantity of eligible existing capacity within West London (the apportionment baseline of 1.64 million tpa) and the quantity of municipal solid waste*

*(MSW) and commercial and industrial (C&I) waste forecast to arise in West London. In these circumstances, the provision of capacity to manage the requisite London Plan tonnages at a faster rate than indicated is encouraged. The expectation is that substantive provision would be made on allocated sites in the first instance. Any such provision should be consistent with the waste hierarchy'*.

4.2.15 Policy WLWP1 'Provision of New Waste Management Capacity' supports proposals for waste management uses which would provide annual capacity to meet the apportionment figures set in the London Plan and which help to achieve net self-sufficiency across the Plan Area. Policy WLWP1 states that '*Provision over and above the tonnages required to meet the London Plan apportionment and of a nature similar to that identified above (i.e. re-use, recycling and other recovery) will be encouraged where this will contribute towards net self-sufficiency'*. Policy WLWP1 states that for apportioned waste (MSW and C&I waste) this provision should be delivered on allocated sites identified in Policy WLWP2. It also states that for non-apportioned waste (Construction, demolition and excavation waste) development of management capacity will be supported in principle that contributes towards net self sufficiency across the Plan Area, where that capacity accords with the waste hierarchy with particular support for the production of material suitable for use as substitutes for virgin materials such as recycled aggregates.

4.2.16 Policy WLWP 3 'Location of Waste Development' states that waste development on existing sites and those allocated within the WLWP will generally be supported, provided that the proposals comply with the Development Plan. However, it also states that '*waste development on other sites will be supported in principle if the proposals comply with the other WLWP policies and the Borough's and the OPCD's adopted development plans, and:*

*a. It can be demonstrated that the development cannot be delivered at any available and suitable existing waste management site within the Borough or OPCD area where the development is proposed and at the sites listed in Tables 5-1 and 5-2; and*

*b. In the case of facilities proposed for the management of MSW and C&I waste, identified sites in Tables 5-1 and 5-2 have not come forward and it can be demonstrated that there will be a shortfall in the waste management capacity required to meet the Borough's joint apportionment target as specified in Policy WLWP2; and*

c. *There is no adverse cumulative effect, when taken together with existing waste management facilities, on the well-being of the local community, including any significant adverse impacts against the WLWP sustainability objectives (see Appendix 1); and*

d. *The proposed site meets the criteria set out in the subsequent WLWP Policies if applicable*.'

4.2.17 The explanatory text states that '*as a general principle, all waste management developments are expected to complement the surrounding area and act as a good neighbour to all existing and proposed uses on neighbouring land and in the vicinity…….Noise, litter and all other emissions (including those to air and water) must be adequately controlled so as not to cause any adverse impact on the surrounding area.'*

4.2.18 Policy WLWP 4 'Ensuring High Quality Development' requires all waste proposals to demonstrate, for both the construction and operational phases, that development will not have an unacceptable impact on local amenity, there are adequate means of controlling emissions (e.g. noise, odour, litter, dust etc), the development is of a scale, form and character appropriate to its location and consideration has been given to sustainable modes of transport for the movement of waste. Other considerations include that traffic associated with the facility will not exceed the capacity of the local road network and there will be no adverse impact on flood risk, surface and groundwater quality, cultural heritage, health or biodiversity.

4.2.19 Policy WLWP 6 'Sustainable Site Waste Management' encourages sustainable waste management and requires at least 10% of the materials or products used in the construction and operation of the development to be re-used or recycled and sourced from within 100km of the site. It also requires the minimisation of construction, demolition and excavation wastes and for them to be reused or recycled on site, where practicable and environmentally acceptable.

4.2.20 Policy WLWP 7 'National Planning Policy Framework: Presumption in Favour of Sustainable Development' requires the Borough Councils and OPDC to take a positive approach that reflects the presumption in favour of sustainable development contained within the NPPF. They will work proactively with applicants to find solutions, and to secure development that improves the economic, social and environmental conditions of the area. Planning applications that accord with the

WLWP policies will be approved without delay unless material considerations indicate otherwise.

Hillingdon Local Plan Part 1 and Part 2

4.2.21 The two parts of the Hillingdon Local Plan form the Council's future development strategy for the borough. The Local Plan Part 1, which was adopted in November 2012, sets out the overall level and broad locations of growth up to 2026. It comprises a spatial vision and strategy, strategic objectives, core policies and a monitoring and implementation framework with clear objectives for achieving delivery. These policies are supported by more detailed policies and allocations set out in the Local Plan Part 2.

*Local Plan Part 1*

4.2.22 Local Plan Policy NPPF1 'National Planning Policy Framework – Presumption in Favour of Sustainable Development' confirms the Council's commitment to ensuring that a positive approach is taken that reflects the presumption in favour of sustainable development.

4.2.23 Policy BE1 'Built Environment' states that the Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working.

4.2.24 Policy EM8 'Land, Water, Air and Noise' states that the Council will seek to safeguard and improve all water quality, including groundwater and surface water. It also states that development should not cause deterioration in the local air quality levels and should ensure protection of both existing and new sensitive receptors. All major development within the Air Quality Management Area should demonstrate air quality neutrality. In terms of 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. Furthermore, all new development must demonstrate the incorporation of water efficiency measures, including water recycling and collection facilities unless it can be demonstrated that it is not appropriate.

4.2.25 Policy EM11 'Sustainable Waste Management' states that the Council will aim to reduce the amount of waste produced in the Borough and work in conjunction with its West London partners to identify and allocate suitable news sites for waste

management facilities to meet the London Plan's apportionment figures[1]. The policy promotes the waste hierarchy and the reduction of waste through measures such as bioremediation of soils and best practice in building construction. It states that the Council promotes using waste as a resource and reuse and recycling of materials.

4.2.26 Policy T1 'Accessible Local Destinations' states that development will be steered towards the most appropriate locations in order to reduce their impact on the transport network. All development should encourage access by sustainable modes and include good cycling and walking provision.

*Local Plan Part 2*

4.2.27 Local Plan Part 2 'Development Management Policies', adopted in January 2020, provides detailed policies that will form the basis of the Council's decisions on individual planning applications.

4.2.28 Policies DMHB 1 'Heritage Assets' and DMHB 2 'Listed Buildings' state that development should avoid harm to the historic environment and that permission will not be granted for proposals which are considered detrimental to the setting of a Listed Building.

4.2.29 Policy DMHB 11 'Design of New Development' requires all development, including extensions, alterations and new buildings to be designed to the highest standards and incorporate principles of good design. It states that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space. Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. Furthermore, proposals should make sufficient provision to allow for waste to be recycled.

4.2.30 Policy DMEI 14 'Air Quality' seeks to ensure that development proposals demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants. It states that development proposals should, as a minimum, be at least air quality neutral, include sufficient mitigation to ensure there is no unacceptable risk from air

[1] London Plan 2011 apportionment figure for Hillingdon was 3.7% of London's total waste arisings or 341,000 tonnes per annum by 2021, expected to rise to 382,000tpa by 2026 and 426,000tpa by 2031. London Plan 2021 apportionment figure for Hillingdon is 5.1% of London's total waste arisings or 423,000tpa by 2021, expected to rise to 449,000tpa by 2041.

pollution to sensitive receptors, and actively contribute towards the improvement of air quality (especially within the Air Quality Management Areas).

4.2.31 Policy DMIN 4 'Reuse and Recycling of Aggregates' promotes the recycling and re-use of construction, demolition and excavation waste and aggregates.

4.2.32 Policy DMT 1 'Managing Transport Impacts' requires development proposals to meet the transport needs of the development and address its transport impacts in a sustainable manner. In order for developments to be acceptable they are required to:

i. be accessible by public transport, walking and cycling either from the catchment area that it is likely to draw its employees, customers or visitors from and/or the services and facilities necessary to support the development;

ii. maximise safe, convenient and inclusive accessibility to, and from within developments for pedestrians, cyclists and public transport users;

iii. provide equal access for all people, including inclusive access for disabled people;

iv. adequately address delivery, servicing and drop-off requirements; and

v. have no significant adverse transport or associated air quality and noise impacts on the local and wider environment, particularly on the strategic road network.

4.2.33 Policy DMT 1 also states that proposals for major development are required to be accompanied by a satisfactory Transport Statement which should demonstrate how any potential impacts will be mitigated and how such measures will be implemented.

4.2.34 Policy DMT 2 'Highways Impacts' requires development proposals to have a safe and efficient vehicular access to the highway network and to ensure that they do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents. The policy also requires that safe access and facilities for cyclists and pedestrians are accommodated and that there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing and committed roads.

4.2.35 The Local Plan Part 2 'Site Allocations and Designations' was adopted in January 2020. Within this document, the application site (the Former Coal Depot) is allocated for a mixed-use development (site allocation SA37). Policy SA37 'Former Coal Depot, Tavistock Road', applies to the entire Old Coal Depot site, excluding the rail sidings to the south, and states that the Council will support proposals for mixed use development that capitalises on the proximity of the Crossrail station and promotes regeneration in Yiewsley Town Centre. Key development principles are as follows:

- One third of the site should accommodate residential development;
- Subject to demand and viability, a proportion of the site should accommodate B1 office (now Use Class E) and SME workshops that do not detract from residential uses;
- A proportion of community infrastructure should be provided that meets local needs;
- The provision of high quality open space; and
- Consideration should be given to the proposed access arrangements to the site.

4.2.36 Development considerations include the need to conserve and enhance the Beeches Nature Conservation Site and the need to not undermine the continued viability of the adjacent railhead and ensure that the amenity of the proposed development is not adversely affected by levels of noise, dust, light and air emissions.

4.2.37 The delivery of the scheme is indicated as being between 2021 and 2026.

## 4.3 National Policy

The National Planning Policy Framework (NPPF) (2023)

4.3.1 The NPPF is the primary national planning policy document and is a material consideration in the determination of planning applications. The most recent version of the NPPF was published in December 2023. The document sets out the overarching planning policy that shall be implemented through the Development Plan and determination process. Key paragraphs of relevance to the determination of the proposal are summarised below.

4.3.2 Paragraph 8 of the NPPF outlines the three overarching objectives for achieving sustainable development:

- An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of the present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect

current and future needs and support communities' health, social and cultural well-being; and

- An environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change including moving to a low carbon economy.

4.3.3 The economic, social and environmental objectives should be pursued in mutually supportive ways. Paragraph 11 constitutes the Government's view of what sustainable development in England means in practice for the planning system. In terms of decision-taking, this means:

*'c) approving development proposals that accord with an up-to-date development plan without delay; or*

*d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'*

4.3.4 Paragraph 108 states that transport issues should be considered from the earliest stages of development proposals so that the potential impacts of development on transport networks can be addressed. It goes on to say that the environmental impacts of traffic and transport infrastructure should also be identified, assessed and taken into account, including appropriate opportunities for avoiding and mitigating any adverse effects.

4.3.5 Paragraph 115 states '*development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road would be severe.'*

4.3.6 Paragraph 192 states that planning decisions should seek to sustain and contribute towards compliance with relevant pollutant limit values, taking into consideration the presence of Air Quality Management Areas and Clean Air Zones and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality and mitigate impacts should be identified through preparation of relevant traffic and transport management plans.

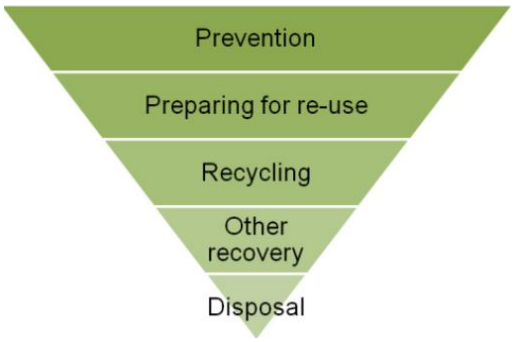
4.3.7 Paragraph 194 states that the focus of planning decisions should be on whether the proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively.

National Planning Policy For Waste - 2014

4.3.8 The NPPF does not provide any waste policies. However, the National Planning Policy for Waste (NPPW), published in October 2014, provides the national policy relating to waste management.

4.3.9 Paragraph 1 of the NPPW acknowledges that positive planning plays a pivotal role in delivering the country's waste ambitions through (inter alia) the delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits by driving waste management up the Waste Hierarchy.

4.3.10 The Waste Hierarchy is set out in Appendix A of the NPPW as below:




4.3.11 The 'Waste Hierarchy' ranks waste management options according to what is best for the environment. It gives priority to preventing waste in the first place. However, when waste is created, it gives priority to preparing it for re-use, then recycling, then recovery and last of all disposal (e.g. landfill). The proposed waste transfer station would facilitate the sorting and bulking of skip waste which would separate the

recyclable waste from the non-recyclable waste, thereby maximising the potential for materials to be recycled at third party re-processors.

4.3.12 Paragraph 4 of the NPPW states that Waste Planning Authorities should identify areas for new or enhanced waste management facilities in appropriate locations including giving priority to the re-use of previously developed land.

4.3.13 Paragraph 7 of the NPPW sets out criteria that Waste Planning Authorities should consider when determining planning applications including considering the likely impact on the local environment and on amenity ensuring that waste management facilities in themselves are well designed, so that they contribute positively to the character and quality of the area in which they are located.

Resources and Waste Strategy for England: 'Our Waste: Our Resources' – 2018

4.3.14 The Resources and Waste Strategy for England was published in December 2018. It builds upon the objectives of the Waste Hierarchy and sets out how the Government will continue to move toward a circular economy through reducing waste and promoting resource efficiency. The two overarching objectives of the Resources and Waste Strategy are to:

1. Maximise the value of resource use; and
2. Minimise waste and its impact on the environment.

4.3.15 The Strategy acknowledges that whilst the prevention of waste is key, some amount of waste is inevitable. Where waste does occur, it must be managed in the most resource efficient way possible, in keeping with the Waste Hierarchy.

### 4.4 Planning Policy Conclusions

4.4.1 The proposed development comprises the construction and operation of a temporary waste transfer station which would accept skip waste from household, commercial and industrial sources. The Applicant currently operates a skip hire business from a nearby plot within the wider Old Coal Depot site. During discussions with the landowner, Network Rail, regarding the potential to relocate the business, the proposed site in the north of the depot (i.e. the application site) was identified as an alternative which may provide a more suitable location for the Applicant. Planning permission is therefore being sought for this new site.

4.4.2 The application site lies within the wider Old Coal Depot site, which is allocated within the Hillingdon Local Plan as a site to be developed for mixed use, including up to a third of the land for residential use. The site allocation indicates that development

would be delivered between 2021 and 2026 although at the current time, no development proposals have been brought forward.

4.4.3 The proposed development would be for a temporary period of 5 years, which would provide additional time for the Applicant to identify and develop a new site within West London for its waste business. The proposed development constitutes a 'meanwhile use' of land which is currently vacant and would not preclude its future mixed use development. It is considered that the proposed development would make the best use of a brownfield site for a temporary period, which accords with policies within the NPPF and policy GG2 of the London Plan (2021).

4.4.4 The London Plan states that by 2026, 100% of London's waste should be managed within London to enable the city to be 'net self sufficient' and the WLWP seeks to locate waste management facilities as close as possible to the source of the waste. The proposed development would contribute towards these objectives by providing a London-based waste transfer facility for household, commercial, industrial, and C,D&E waste collected from within West London. The Applicant's current business has a recycling rate of approximately 90% and this could be further increased should permission be granted for the proposed development.

4.4.5 Punjab Skips Limited has been operating its skip hire business since 2003. The proposed development would provide continued employment for 11 staff and an additional 5 jobs for local people. Over half of the current employees live within West Drayton and the business provides a small but important contribution towards the local economy.

4.4.6 The proposed development would be subject to the conditions of an Environmental Permit, regulated by the Environment Agency, which would further ensure that the facility would be operated to high environmental standards. Specialist technical assessments undertaken to support this planning application have demonstrated that the proposed development would not give rise to any unacceptable environmental or amenity issues.

4.4.7 In conclusion, the proposed development of a waste transfer station for a temporary period, would accord with both the local and national policies described within this Section of the Planning Statement and is therefore in accordance with the Development Plan for Hillingdon.

# 5 ENVIRONMENTAL CONSIDERATIONS

## 5.1 Introduction

5.1.1 The proposed development is supported by assessments which consider the potential environmental impacts of the development and assesses the proposal's compliance with local and national policy. The following technical assessments have been prepared in support of this application:

- Sound Level Assessment;
- Air Quality Assessment;
- Landscape and Visual Technical Note; and
- Transport Statement

5.1.2 The assessments have been undertaken by specialist consultants to identify the potential for environmental effects associated with the operation of the proposed waste transfer station, including the construction of the facility, the delivery of waste to the facility, the sorting, processing and bulking of waste and the transport of waste off site. Where required, mitigation measures have been recommended in order to avoid, reduce or minimise the potential for environmental effects. These are set out within the following sections.

5.1.3 The proposed development would be for a temporary period of 5 years after which the WTS building and all plant and machinery would be decommissioned and removed from the site.

## 5.2 Noise

5.2.1 A Sound Level Assessment has been prepared and is provided within Appendix A of this Planning Statement. The Sound Level Assessment considers the impact at the nearest residential properties and has been undertaken in accordance with the guidance provided within BS 4142:2014+A1:2019[2] and relevant planning policy.

5.2.2 Relevant planning policy is described within the Sound Level Assessment report along with the methodology used within the assessment. However, in brief, the BS 4142 assessment method is to obtain an initial potential impact finding by comparing the difference in level between the site-attributable sound (called the rating level) and the background sound. The latter is the underlying value in the absence of the site sound. The initial impact finding is then to be considered in context and that can modify the outcome. In terms of the 'difference' comparison, a difference of around +10dB or

[2] BS 4142:2014+A1:2019, Methods for rating and assessing industrial and commercial sound

more is considered likely to be an indication of a 'significant adverse impact', depending on the context. A difference of around +5dB is likely to be an indication of an 'adverse impact', depending on the context. When the difference is around zero or negative in magnitude, the indication is of a 'low impact', again depending on the context.

5.2.3 Context is key and pertinent factors to consider include the absolute level of the source; the character of the neighbourhood sounds (with and without the site contribution); the sensitivity of the receptor and the presence or otherwise of sound mitigation measures (Clause 11 of BS4142). This includes whether dwellings or other premises used for residential purposes will already incorporate design measures that secure good internal and/or outdoor acoustic conditions such as facade insulation treatment.

5.2.4 It is therefore entirely possible that whilst the numerical outcome of a BS 4142 assessment is indicative of adverse or significant adverse impact, when the proposal is considered in context the significance of the impact is reduced to an acceptable level.

5.2.5 The site is located within an existing industrial estate with a variety of uses present within the surrounding area including existing waste facilities. In the southern part of the industrial depot, a rail freight sidings is present and is currently used by Hanson as an aggregates rail depot. It is understood that there are no operating hours restrictions on this site, however, the depot is in operation during daytime hours seven days a week. An extensive rail network is located to the south of the depot which is used by both passenger and freight trains with residential premises located beyond where existing ground levels are around 4m below the height of the railway.

5.2.6 An additional rail line traverses around the remaining boundary of the industrial estate with residential premises located off Tavistock Road beyond the line to the east. A household waste recycling depot is located within the industrial estate between the site and dwellings to the east. Various commercial / industrial premises are located beyond the rail line to the north with these uses surrounding a residential dwelling. The M25 is located around 1.5km to the west with Heathrow Airport located around 3.5km to the south.

5.2.7 A baseline sound level survey was undertaken on Friday 29th and Saturday 30th September 2023. Attended measurements were collected at two locations (NML1 and NML2) which were representative of the closest residential receptors. Location NML1

was located at the rear of dwellings on the western end of Merrivale Mews, off Tavistock Road. Location NML2 was located on grassland in front of apartments on Weirside Gardens. The locations of the attended measurements are shown within the Sound Level Assessment report (Figure 3.2). The dominant sound source in the area around the site was road and rail traffic sources along with overhead aircraft. Sources of industrial noise from the wider Old Coal Depot site, along with existing vehicle movements were also audible.

5.2.8 Consideration was also given to a receptor which is representative of a nearby parcel of land designated for residential development (the former Comag site) on Tavistock Road to the north east. Data submitted with the original planning application for the development (application reference 24843/APP/2022/2403) was used to represent baseline sound levels at the site.

5.2.9 In order to quantify an internal specific sound level within the proposed building, reference was given to measured sound levels from within the noise consultant's database of waste processing plant and activities operating at full capacity which have been obtained at a number of comparable sites. In the specific context of sound emissions, based on previous experience of the noise consultant on similar sites, sound from the processing of waste using a trommel would be expected to be the principal source of sound associated with the proposed operations. The Sound Level Assessment considered the proposed waste transfer operations as well as the predicted number of waste and staff vehicles travelling to the site each day. The assessment assumed that the site would be fully operational during the week. However, on Saturdays the site would only be open between the hours of 0800 and 1300 hours and no screening would be carried out using the trommel.

5.2.10 Through a comparison between background sound levels and rating levels it was concluded that the initial impact outcome is predicted to be low at all receptors on both weekdays and Saturdays. Furthermore, the site is located within an existing industrial estate where existing industrial and waste premises are operating. A rail aggregates depot lies to the south of the site and this is understood to operate during the daytime period, seven days per week. The predicted change in sound level at the identified nearby receptors of less than 3dB would represent a negligible impact.

5.2.11 It is considered that the proposed development would not give rise to any unacceptable noise effects and would therefore accord with both national and local planning policy, particularly WLWP Policy 4, Hillingdon Local Plan (Part 1) Policy EM8 and Local Plan (Part 2) Policy DMHB11.

## 5.3 Air Quality

Introduction

5.3.1 The proposed development has the potential to give rise to air quality impacts as a result of fugitive dust emissions and road vehicle exhaust emissions during the operation of the site. As such an Air Quality Assessment has been undertaken in order to determine the baseline conditions and assess potential effects as a result of the scheme. The Air Quality Assessment is provided at Appendix B.

5.3.2 Potential air quality impacts may include:

- Fugitive dust emissions from the proposed operations during the operational phase; and
- Road traffic exhaust emissions associated with vehicles travelling to and from the site during the operational phase.

5.3.3 As required by the Environment Act (1995), the London Borough of Hillingdon (LBoH) has undertaken Review and Assessment of air quality within their area of jurisdiction. This process has indicated that annual mean concentrations of $NO_2$ are above the relevant Air Quality Objective (AQO) within the borough. As a result, one AQMA has been declared. This is described as follows:

*'The area from the southern boundary north to the border defined by, the A40 corridor from the western borough boundary, east to the intersection with the Yeading Brook north until its intersection with the Chiltern-Marylebone railway line.'*

5.3.4 In terms of the baseline conditions, the site lies within an Air Quality Management Area (AQMA). As such, there is the potential for vehicles travelling to and from the development to increase pollution levels in this sensitive area. This has been considered throughout the Air Quality Assessment.

5.3.5 The LBoH has concluded that concentrations of all other pollutants considered within the Air Quality Strategy are currently below the relevant AQOs. As such, no further AQMAs have been designated.

5.3.6 Monitoring of pollutant levels is undertaken by LBoH throughout their area of jurisdiction. Recent $NO_2$ concentrations recorded in the vicinity of the development indicate that annual mean $NO_2$ concentrations were below the relevant AQO of 40µg/$m^3$ at all monitors in recent years.

5.3.7 Pollution concentrations recorded during 2020 and 2021 were lower than 2019 due to a reduction in traffic and associated emissions caused by the COVID-19 pandemic. The results should therefore be viewed with caution.

5.3.8 LBoH do not undertake monitoring of $PM_{10}$ or $PM_{2.5}$ within the vicinity of the site.

5.3.9 Predictions of background pollutant concentrations on a 1km by 1km grid basis have been produced by DEFRA for the entire of the UK to assist Local Authorties in their Review and Assessment of air quality. The proposed development site is located in grid square NGR: 505500, 180500. Data for this location was downloaded from the DEFRA website for the purpose of the assessment and show that predicted background $NO_2$, $PM_{10}$ and $PM_{2.5}$ concentrations are below the relevant AQOs and Interim Target at the development site.

5.3.10 The methodology for the Air Quality Assessment uses a Source-Pathway-Receptor approach, as described within the report. A sensitive receptor is defined as any location which may be affected by changes in air quality as a result of a development.

Assessment of Dust

5.3.11 A desk-top study was undertaken in order to identify any sensitive receptor locations in the vicinity of the site that required specific consideration as part of the assessment of fugitive dust emissions. The receptors identified comprised four residential locations on Fairway Avenue to the south, south east and south west of the site and a residential location on Weirside Gardens to the south east.

5.3.12 In terms of the Source Emission Potential of the operations (materials handling, material processing and stockpiles and exposed surfaces), the magnitude of residual source emissions from dust generating activities was classified as 'small' to 'medium'. As such a classification of 'medium' was used throughout the assessment as a worst case.

5.3.13 The Pathway Effectiveness was subsequently defined based on the distance between the facility and the identified receptors, as well as the prevailing meteorological conditions. The Pathway Effectiveness was determined to be 'moderately effective' at five receptor locations and 'ineffective' at four receptor locations.

5.3.14 The residual source emission, Pathway Effectiveness and receptor sensitivity were combined to assess potential effects resulting from the proposed development. The assessment demonstrated that the effect significance was predicted to be 'slight' at five receptor locations and 'negligible' at four receptor locations. The relevant guidance[3] states that only if the impact is 'moderate' or 'substantial' is the effect considered 'significant'. Therefore the impact is considered 'not significant'.

[3] Guidance on the Assessment of Mineral Dust Impacts for Planning v1.1, IAQM, 2016

Assessment of Road Vehicle Exhaust Emissions

5.3.15 Vehicle movements associated with the operation of the waste transfer station will generate exhaust emissions on the local and regional road networks. An assessment was therefore undertaken using dispersion modelling in order to quantify potential changes in pollutant concentrations at sensitive locations in the vicinity of the site.

5.3.16 Locations sensitive to potential operational phase road vehicle exhaust emission impacts were identified from a desk top study. These comprised 9 receptors along Tavistock Road, High Street and Horton Road. Eight of these were residential receptors and one was Yiewsley Health Centre. All receptors are shown on Figures 3 and 4 of the Air Quality Assessment report (Appendix B).

5.3.17 The assessment of potential impacts considered three scenarios:

- 2019 - Verification;
- Opening year Do-Minimum (DM) (predicted traffic flows in 2024 should the proposals not proceed); and,
- Opening year Do-Something (DS) (predicted traffic flows in 2024 should the proposals be completed).

5.3.18 The annual mean $NO_2$ concentrations were predicted at the sensitive receptor locations for the DM and DS scenarios. The assessment demonstrated that the predicted annual mean $NO_2$ concentrations were below the AQO of 40µg/m$^3$ at all receptors in both the DM and DS scenarios.

5.3.19 Annual mean $PM_{10}$ concentrations were predicted at the sensitive receptor locations for the DM and DS scenarios. The assessment demonstrated that the predicted annual mean $PM_{10}$ concentrations were below the AQO of 40µg/m$^3$ at all receptors in both the DM and DS scenarios.

5.3.20 Annual mean $PM_{2.5}$ concentrations were predicted at the sensitive receptor locations for the DM and DS scenarios. The assessment demonstrated that the predicted annual mean $PM_{2.5}$ concentrations were above the Interim Target of 12µg/m$^3$ at 17 receptors and below at two receptors in both the DM and DS scenarios.

5.3.21 Impacts on annual mean $NO_2$, $PM_{10}$ and $PM_{2.5}$ concentrations as a result of the proposed development were predicted to be 'negligible' at all receptors. The overall significance of operational phase road traffic emission impacts was determined as 'negligible'. Further justification is provided within the Air Quality Assessment report.

5.3.22 Relevant guidance[4] states that only if the impact is 'moderate' or 'substantial' is the effect considered 'significant'. Therefore the impact is considered 'not significant'.

5.3.23 In conclusion, the risk of potential effects as a result of fugitive dust emissions from the facility during the operational phase was assessed using the IAQM methodology. This included consideration of the Source Emission potential, Pathway Effectiveness and sensitivity of relevant receptors in the vicinity of the site. The results of the assessment indicated the overall effects as a result of the development were predicted to be 'not significant'.

5.3.24 Potential impacts during the operational phase of the proposals may occur due to road traffic exhaust emissions associated with vehicles travelling to and from the site. Dispersion modelling was therefore undertaken in order to predict pollutant concentrations at sensitive locations as a result of emissions from the highway network both with and without the development in place. Results were subsequently verified using local monitoring data. The assessment concluded that impacts on annual mean $NO_2$, $PM_{10}$ and $PM_{2.5}$ concentrations were predicted to be 'negligible' at all sensitive receptor locations. Following consideration of the relevant issues, air quality impacts as a result of road vehicle exhaust emissions associated with the operation of the development were considered to be 'not significant'.

5.3.25 The proposal would not result in any unacceptable impact upon the environment or local amenity from fugitive dust emissions or vehicle exhaust emissions and therefore it is considered to be in accordance with both national and local policy, in particular policy EM8 of the Hillingdon Local Plan (Part 1) and policies DME1, DMT 1 and DMT 2 of the Hillingdon Local Plan (Part 2).

## 5.4 Landscape and Visual

5.4.1 A Landscape and Visual Technical Note has been prepared and is provided within Appendix C of this Planning Statement.

5.4.2 The proposed development would include the construction of a 30m by 30m waste transfer station building, which would have height of 10m to the eaves and 11.5m to the roof ridge, providing a site and welfare cabin in the south east of the site and creating an area for vehicle parking and skip storage. An existing access would be used to allow vehicles to enter and leave the site. The proposed development would be temporary in nature for a period of 5 years.

[4] Land-Use Planning & Development Control: Planning for Air Quality, IAQM, 2017

5.4.3 In terms of it setting, the boundary of Colne Valley Park and Green Belt is located immediately to the north of the site, along with Nature Conservation Sites of Metropolitan or Borough Grade I Importance to the north and east. The edge of an Area of Special Local Character (Garden City, West Drayton – residential area) is located approximately 50m to the south of the site access, south of the railway line.

5.4.4 There are Listed Buildings to the east of the site entrance, including The Railway Arms Public House (Grade II) and the De Burgh Public House (Grade II) and the Offices of the Valentine Varnish and Lacquer Company (Grade II), which is located to the south.

5.4.5 The site is located within National Character Area 115 Thames Valley, which is described in the summary as '*a mainly low-lying, wedge-shaped area, widening from Reading, which includes Slough, Windsor, the Colne Valley and the southwest London fringes. The River Thames provides a unifying feature through a very diverse landscape of urban and suburban settlements, infrastructure networks, fragmented agricultural land, historic parks, commons, woodland, reservoirs and extensive minerals workings*.'

5.4.6 The Hillingdon Townscape Character Study (Allies and Morrison, Nov 2013) identified the site as located on the boundary between the 'Colne Valley corridor - defining a clear western edge to the borough dominated by canal, rivers and larger bodies of water', and the 'Canal corridor – Industrial development following the Grand Union Canal and the focus for significant growth and change'. This document also included a reference in Figure 6 to the Hillingdon Landscape Character Assessment (Land use Consultants) which identified the site within an area of 'Inter-war Suburb / Metroland'.

5.4.7 The existing site includes hardstanding and roadways, associated with the former Coal Depot and the access road extends to the public highway at Tavistock Road. There are several storage containers and skips on the main site, with concrete uprights / walling.

5.4.8 The site is located within a built-up predominately urban area, with the following elements and features adjacent:

- There are two large industrial buildings immediately to the south of the site (measuring 33m x 26m x 9m high (approx.) and 22m x 11m x 5m high (approx.)), with hardstanding extending up to the railway line (with 8m high gantries). The residential development along Fairway Avenue lies beyond the railway approximately 120m away from the main site (with dwellings typically up to 8m high);

- A belt of vegetation extends along the northern site boundary, adjacent to the disused railway line, with areas of hardstanding and a scattered pattern of

buildings associated with Marshalls Yard and Meadows Cabins Container Storage beyond (typically up to 4-5m high). Beeches Way follows along Trout Lane at approximately 150m to the north;

- Hardstanding extends for over 100m to the east of the main site, up to a belt of vegetation (12-16m high) along the railway line and Frays River. The residential development along Tavistock Road lies beyond the river at 140m away from the main site (with dwellings typically up to 8m high), with Yiewsley settlement and High Street further east; and

- Hardstanding and roadways (with storage containers, etc) extends for over 200m to the west, up to a belt of vegetation adjacent to the disused railway line. Beyond this point there is additional vegetation alongside the Thorney Weir Fishing Club Lake and River Colne. The Colne Valley Trail passes through this area.

5.4.9 The topography within the site is generally flat at ~30m AOD and part of the broader river valley basin area which ranges in elevations from ~24-27m AOD.

5.4.10 The existing site is of relatively low landscape value overall due to the following:

- The site has little to no natural heritage interest, being hardstanding, roadways and containers on the former Coal Depot;

- The site has no historical or cultural interest which contributes positively to the landscape and is developed land; and

- The site is not particularly distinctive, is of low scenic quality and not particularly tranquil or wild.

5.4.11 The site has very limited visibility, due to its flat valley topography, vegetation belts and built forms around the boundaries and surrounding areas.

5.4.12 The nearest potential visual receptors include the following:

- Inhabitants of settlements and local residents within individual properties, such as on the edge of Yiewsley (along Tavistock Road) to the east and 'Garden City, West Drayton' (along Fairway Avenue) to the south;

- Users of the local road network such as along Tavistock Road to the east, Fairway Avenue to the south and Trout Road to the north;

- Travellers along railway line to the south; and
- Users of the Public Rights of Way around the application site, including Colne Valley Way to the west and Beeches Way to the north.

5.4.13 The proposed development would not result in any perceptible change to the landscape character and it would be positioned within an existing built up area. At a local scale, although the building would be approximately 2m higher than the existing building to the south, it would have a similar overall footprint. The container storage and vehicle movements would be similar to the existing situation on site. It is therefore concluded that the changes would be limited and consistent with existing landscape characteristics.

5.4.14 In terms of visibility, there would be very limited visibility of the proposed development due to the dimensions of the building, its position within an area with very flat topography, as well as vegetation belts and built forms around the boundaries and surrounding areas. There would be little to no visibility of the site for inhabitants of Garden City, West Drayton or Yiewsley. Users of the railway line to the south would be transient in nature and there is intervening vegetation and development. Users of the Colne Valley Way to the west and Beeches Way to the north would have obscured views due to existing vegetation, although localised open views may be possible from short sections. Little to no change is therefore anticipated to views and visual amenity as a result of the proposed development.

5.4.15 The proposed development would be of a temporary nature for a period of 5 years, after which time all buildings, plant and machinery would be removed from the site.

5.4.16 It is concluded that the proposed development would not result in any unacceptable landscape or visual effects and the proposal therefore accords with both national and local planning policy, in particular Hillingdon Local Plan (Part 1) policies HE1 and BE1.

### 5.5 Traffic and Transport

5.5.1 A Transport Statement (TS) has been prepared and is provided within Appendix D of this Planning Statement.

5.5.2 The proposed waste transfer station would be located within the northern part of the Old Coal Depot and would be accessed from the existing site entrance off Tavistock Road to the south east of the site. Waste vehicles would enter and leave the site using the existing internal access road. A turning traffic count was carried out in September

2023 at the junction of the site entrance and Tavistock Road. The results are provided within the TS.

5.5.3 The latest accident data was obtained for the TS which indicated that 1 serious accident was recorded along Tavistock Road to the west of the site entrance, 2 slight accidents and 1 serious accident were recorded at the High Street/West Drayton Station Approach mini roundabout. However, there were no recorded accidents at the site entrance itself. It is considered that the recorded accident data within the vicinity of the site does not indicate any existing highway safety patterns or problems.

5.5.4 During the construction phase of the proposed development, there would be approximately 4 HGVs (i.e. 8 two-way HGV movements) associated with the delivery of building materials over a period of approximately 4 weeks. All delivery vehicles would use the existing site entrance and follow the route along the existing access road to the site. Construction traffic associated with the proposal is therefore anticipated to be extremely low.

5.5.5 During the operation of the waste transfer station there would be waste vehicles entering and leaving the site associated with the importation and export of waste. Waste would be imported to the site in skips, which have an average payload of approximately 4 tonnes. Inert waste and soils would be transported off the site in 8 wheel tippers which have an average payload of 17 tonnes. Non-inert materials would be transported off the site in rigid containers on a hook loader. The containers have an average payload of approximately 6 tonnes.

5.5.6 The maximum throughput of the waste transfer station would be 75,000 tonnes per annum (tpa) as this is the maximum allowed under the proposed Environmental Permit. To assess the worst case scenario, a figure of 75,000tpa has therefore been used in the assessment within the TS. Based on 275 working days per year (i.e. 5.5 working days over 50 weeks per year), this equates to 68 skip wagons per day, importing waste to the site.

5.5.7 Outgoing waste is generally taken to either Fowles Recycling in Stanwell near Heathrow or to Cappagh's Stanwell Recycling Facility in Hounslow. The TS assumes a 50/50 split between inert waste being transported in 8 wheel tippers and non-inerts being transported in rigid containers on hook loaders. Assuming 37,500 tonnes of each waste stream and 275 working days per year, the predicted numbers of vehicles associated with transporting waste off site are as follows:

- Non-inert – 23 vehicles per day;

- Inert – 8 vehicles per day.

5.5.8 Based on the maximum quantity of waste which would be allowed under the Standard Rules Permit (i.e. 75,000tpa), the total number of HGVs associated with transporting waste into and from the site is calculated to be an average of 99 HGVs per day, although the site would work reduced hours on a Saturday (see Section 3.2.15).

5.5.9 Notwithstanding the calculations set out above, which are based on a throughput of 75,000tpa, discussions with the Applicant have established that a lower quantity of waste is likely to be accepted at the facility. Based on the business's current activity, and allowing for a reasonable level of commercial expansion, it is anticipated that approximately 55,000tpa would be accepted at the site. This would result in approximately 50 skips lorries transporting waste into the site per day (based on an average 4t payload and 275 working days per year). Assuming a 50/50 split of inerts and non-inerts (i.e. 27,500tpa of inerts and 27,500tpa of non-inerts), the predicted number of vehicles associated with transporting waste off site is as follows:

- Non – inert – 17 vehicles per day ;
- Inert – 6 vehicles per day.

5.5.10 Based on a predicted throughput of 55,000tpa, the total number of HGVs associated with transporting waste into and from the site is calculated to be an average of 73 HGVs per day.

5.5.11 In addition, there would be 8 site-based operatives who would travel to the site. The use of public transport or car sharing would be encouraged as far as possible and 6 cycle stands would also be provided.

5.5.12 The existing surfaced internal road is hard surfaced along its length and would be routinely monitored for mud and debris. If required, existing road sweepers would be used to ensure that high standards of housekeeping are maintained and to prevent mud and debris being tracked onto the public highway. In addition, the significant length of the internal access road would help to minimise mud being tracked onto Tavistock Road.

5.5.13 All of the fleet HGVs are Euro 6 standard compliant.

5.5.14 The proposal would not result in any unacceptable impact upon the highway in terms of capacity or safety and therefore it is considered to be in accordance with both national and local policy, in particular policies T1 of the Hillingdon Local Plan (Part 1) and DMT 1 and DMT 2 of the Hillingdon Local Plan (Part 2).

## 5.6 Drainage and Flood Risk

5.6.1 The site lies within Flood Zone 1 which is land at the lowest risk of flooding.

5.6.2 The site has an existing concrete hard surface which would form the development platform for the waste transfer station.

5.6.3 Surface water at the site currently drains both to an existing 10,000 litre underground tank and off site to an adjacent watercourse via interceptors. Surface water would be managed in accordance with current guidance and would flow to the existing surface water drainage system (which runs through the Old Coal Depot) via a new on-site underground storage/attenuation tank, the flow from which would be controlled to ensure appropriate run-off rates. The planning application is supported by a Drainage Assessment which provides further details of the proposed surface water drainage arrangements.

5.6.4 Rainwater from the waste transfer station roof would be directed into above-ground tanks and used for dust suppression and jet washing within the site.

5.6.5 Toilets within the site office/welfare cabin would be drained to an above ground foul water treatment tank which would be routinely emptied by a third party company.

5.6.6 The proposed development would not be at risk from flooding or increase the risk of flooding elsewhere. The proposed development would not have an unacceptable effect on surface water or foul water drainage. Measures would be in place to adequately manage drainage on site. It is therefore considered that the proposed development is in accordance with both national and local policy, in particular policy 4 of the WLWP and policy EM8 of the Hillingdon Local Plan (Part 1).

# 6 NEED AND ALTERNATIVE SITES

## 6.1 Need

6.1.1 The Applicant, Punjab Skips Limited, has operated a successful skip hire business since 2003. Until recently, the business's skip waste was delivered to third party waste transfer stations or Material Recycling Facilities, sometimes up to 20 miles from the customer's location. However this caused operational difficulties due to high fuel costs, associated carbon emissions and unsustainable working practices due to lengthy travel times. Furthermore, sites were sometimes closed to external customers at short notice (e.g. when close to capacity). The number of available waste transfer stations has also reduced in recent years, with some being redeveloped for residential or commercial development.

6.1.2 In order to reduce operating costs and have greater control over its waste management operations, the company started accepting and sorting its skip waste on a small plot within the southern part of the Old Coal Depot. The land is industrial in nature and the Applicant originally understood that the bulking of waste would be permitted under the wider site's B8 (storage and distribution) planning permission. Having subsequently sought advice on this issue, the Applicant now acknowledges that the site may not have a suitable planning permission for a waste use. The Applicant has therefore been searching for potential alternative sites within the West Drayton/Heathrow area, as this is the main geographical area of the company's customer base. However, the Applicant has been unable to find any sites that are available, suitable and deliverable. Discussions with Network Rail, the landowner of the Old Coal Depot, indicated that the application site in the north of the Old Coal Depot was currently available and could be more suitable for the Applicant's business as it is larger than the existing site and has a concrete hardstanding surface. A move to this site has since been agreed with Network Rail, subject to the Applicant obtaining the relevant planning permission and Environmental Permit.

6.1.3 The Applicant proposes to operate from the application site for a temporary period of up to 5 years, which would enable them to search for a more permanent site within the local area. The 5 year period would provide a reasonable timeframe for them to search for a site and apply for both planning permission and an Environmental Permit. As there is a known lack of available sites within this geographical area, and timeframes for determining Environmental Permit applications are currently significant, it is considered that a shorter timeframe would not be sufficient.

6.1.4 It is noted that the application site lies within the Old Coal Depot which is allocated within the Hillingdon Local Plan (Part 2) 'Site Allocations and Designations' as Site Allocation SA37 comprising mixed use development, with up to a third of the site to be developed for residential use. However, at the time of preparing this Planning Statement, it is understood that no proposals have been brought forward for mixed use development on the allocated site. Furthermore, as the proposal is for a temporary period of 5 years, it is considered that the proposed development would not preclude a mixed use being delivered in the future. The proposed development can be considered a 'meanwhile use' which is defined as a situation where a site is utilised for a duration of time before it is turned into a more permanent end use. Such uses are often located on vacant or under-utilised land and buildings and can drive economic outputs, increase positive environmental impacts and deliver social value within a local area. If permission is granted for the use of the site as a waste transfer station, it would provide the Applicant with more time to search for a new, permanent base for its business whilst allowing it to continue to serve its existing customers within the local area.

6.1.5 The Applicant has been operating a successful and profitable skip hire business since 2003 and currently employs 11 staff. The business wishes to increase its productivity and profitability through the expansion of its customer base and by increasing the amount of waste that it collects. The Applicant's current site within the Old Coal Depot does not provide sufficient space for the business to expand. It is therefore essential that the business is able to move to a new site as soon as possible. The application site would enable the Applicant to construct a new temporary building in which to operate and this would have significant environmental and amenity benefits as it would enable the waste to be accepted, sorted and bulked up within a building. The site would be operated in accordance with the conditions of an Environment Permit, regulated by the Environment Agency, which would provide further environmental controls on the site and its operations.

6.1.6 The proposed development would be for a temporary period of 5 years. The use of the application site would constitute a 'meanwhile use' and would not preclude the wider site from being developed in the future. However it would provide a temporary location for the Applicant to continue its skip hire business, whilst it seeks a permanent location to for its business.

6.1.7 The London Plan 2021 sets out the forecast arisings for household, commercial and industrial waste by borough for 2021 and 2041. The forecasts for each of the 6 West London boroughs are set out below:

**Table 6.1: Forecast arisings of household, commercial and industrial waste by borough 2021- 2041 (000's tonnes)**

| Borough | 2021 | 2041 |
|---|---|---|
| Brent | 259 | 274 |
| Ealing | 291 | 306 |
| Harrow | 188 | 205 |
| Hillingdon | 347 | 365 |
| Hounslow | 260 | 275 |
| Richmond Upon Thames | 179 | 190 |
| **Total** | **1,524** | **1,615** |

6.1.8 The borough level apportionment for the 6 boroughs within the West London Waste Plan Area are also provided as follows:

**Table 6.2: Borough level apportionments of household, commercial and industrial waste 2021 – 2041 (000's tonnes)**

| Borough | Apportionment (%)* | 2021 | 2041 |
|---|---|---|---|
| Brent | 5.0 | 412 | 437 |
| Ealing | 6.6 | 542 | 576 |
| Harrow | 1.9 | 160 | 170 |
| Hillingdon | 5.1 | 423 | 449 |
| Hounslow | 5.0 | 407 | 432 |
| Richmond Upon Thames | 1.8 | 148 | 157 |
| **Total** | **25.4** | **2,092** | **2,221** |

*Apportionment is % share of London's total waste to be managed by the borough

6.1.9 The latest available data[5] shows that the quantity of household, commercial and industrial waste received by waste facilities within the 6 West London boroughs amounted to 1,574,039 tonnes (in 2022). This is similar to, but slightly higher than, the amount forecast within the WLWP for 2021 (i.e. 1,524,000t) but is significantly lower than the 2021 apportionment figure for West London of 2,092,000t. The WLWP requires the 6 West London boroughs to provide sufficient capacity to meet their combined apportionment (i.e. not their forecast arisings).

[5] Environment Agency Waste Data Interrogator – Waste Received Version 2, 2022 (added 13th November 2023) which lists waste received at permitted sites

6.1.10 It should be noted that the proposed development would also sort and bulk construction, demolition and excavation (C,D&E) waste in addition to household, commercial and industrial waste. C,D&E waste does not fall within the London Plan apportionment figures. It is likely that the incoming skip waste would comprise an approximate 50/50 split between these waste streams (i.e. approximately 37,500t of household, commercial and industrial waste and 37,500t of C,D&E waste). The Environment Agency's Waste Data Interrogator 2022 indicates that in 2022, 2,473,476t of C,D&E waste was received within the West London Waste Authority Area, of which 947,972t was accepted at waste transfer facilities. It is considered that a significant proportion of this waste stream was sent directly to waste recovery projects. However, there is a clear requirement for around 1 million tonnes of waste transfer capacity within West London.

6.1.11 Paragraph 9.8.9 of the London Plan 2021 states:

*'Waste planning authorities and groups should plan to meet the identified waste management needs of their local area and are encouraged to identify suitable additional capacity for waste, including those waste streams not apportioned by the London Plan, where practicable. This could include, waste transfer sites, new sites managing construction, demolition and excavation waste, or the reconfiguration and intensification of existing uses that increase management capacity.'*

6.1.12 The proposed development would contribute towards the sustainable management of household, commercial and industrial as well as C,D&E waste arisings within the West London Plan Area and adjacent Waste Planning Authorities. The facility would allow the incoming waste to be sorted into separate fractions so that it can be bulked up for onward transport to waste reprocessing facilities. The bulking up of waste has significant environmental and sustainability benefits and reduces the number of vehicle movements on the public highway by using larger vehicles to transport the material to re-processors. This is particularly important for certain waste streams where there are only a limited number of re-processors and travel distances can be significant. The existing business achieves a recycling rate of approximately 90% and this performance could be further improved if the material is able to be sorted using a trommel screen and bulked up within a building.

6.1.13 The business already employs 11 full time staff, more than half of whom are from the West Drayton area. The proposed development would provide employment for a further 5 staff, which would provide a small but important contribution to the local economy.

## 6.2 Alternative Sites

6.2.1 The WLWP identifies 15.52ha of land which is considered to be suitable and available on existing and new sites for future waste management capacity. The sites have been assessed as being broadly suitable for the development of additional waste management capacity and are therefore preferred sites for new waste management development. Policy WLWP 1 'Provision of New Waste Management Capacity' states that over the period to 2031, there is a need for about 614,000 tonnes of additional annual capacity to meet the apportionment set in the London Plan[6]. The policy states that the capacity should be delivered on the allocated sites identified within the WLWP. However it also states '*Provision over and above the tonnages required to meet the London Plan 2011 apportionment and of a nature similar to that identified above[7] will be encouraged where this would contribute towards net self sufficiency'.*

6.2.2 The sites allocated within the WLWP for waste management uses are as follows:

Twyford Waste Transfer Station, Abbey Road, Brent (site number 352)

6.2.3 The full extent of this site is currently occupied by West London Waste which operates a waste transfer station and Household Waste Recycling Facility (HWRC) and it is therefore concluded that the site is not currently available.

Veolia Transfer Station, Marsh Road, Alperton, Brent (site number 1261);

6.2.4 The full extent of this large, allocated site is occupied by Veolia as a waste transfer station. It is therefore concluded that the site is not currently available.

Greenford Reuse and Recycling Site / Greenford Depot, Greenford Road, Ealing (site numbers 309 and 310)

6.2.5 The full extent of this allocated site is currently in use as a HWRC and waste management depot. It is therefore concluded that the site is not currently available.

Quattro Waste Transfer Station, Victoria Road, Park Royal, Ealing (site number 328)

6.2.6 The WLWP, which was published in 2015, states that this site has been identified by HS2 Limited as requiring safeguarding under the HS2 Safeguarding Direction and that the site would only be available for waste management use from 2024 as it will be needed to host a construction compound. Given the well documented delays to the construction of HS2, and the uncertainty relating to the Old Oak Common HS2 Station,

[6] The figure of 614,000t is based on the apportionment figure in the London Plan 2011. The apportionment figure in the London Plan 2021 is higher and therefore the capacity gap is likely to be greater.
[7] i.e. re-use, recycling and other recovery

it can reasonably be assumed that this site will need to be safeguarded beyond 2024 and is therefore not currently available.

Council Depot, Forward Drive, Harrow (site number 222)

6.2.7 The full extent of this allocated site is occupied by Harrow Waste Reuse and Recycling Centre, Harrow Council Depot and a Fleet Services and MOT Centre. It is therefore concluded that this site is not currently available.

Rigby Lane Waste Transfer Station, Hillingdon (site number 331)

6.2.8 The full extent of this site is occupied by Suez's West London recycling and recovery depot. It is therefore concluded that this site is not currently available.

Twickenham Depot, Langhorn Drive, Twickenham, Richmond (site number 342)

6.2.9 The full extent of this site is currently occupied as the London Borough of Richmond upon Thames' Central Depot (Environment Directorate). It is therefore concluded that the site is not currently available.

6.2.10 An additional site was identified within the WLWP as having potential for developing waste facilities. The site is:

Western International Market, Hayes Road, Southall, Hounslow (site number 2861).

6.2.11 The full extent of this site is currently occupied by a large commercial premises building (NatWest Southall Branch), a recycling facility and Quattro's ready mixed concrete depot. It is therefore concluded that the site is not currently available.

Summary

6.2.12 In conclusion, the sites allocated within the WLWP are not currently available for new waste management development. The application site at the Old Coal Depot is not an allocated site. WLWP Policy WLWP 3 'Location of Waste Development' makes provision for waste management development on non-allocated sites, but such proposals must meet certain criteria. The policy states:

'*Waste development on other sites will be supported in principle if the proposals comply with the other WLWP policies and the Boroughs' and the OPDC's adopted development plans, and:*

*a. It can be demonstrated that the development cannot be delivered at any available and suitable existing waste management site within the Borough or OPDC area*

*where the development is proposed and at the sites listed in Tables 5-1 and 5-2[8]; and*

b. *In the case of facilities proposed for the management of MSW and C&I waste, identified sites in Tables 5-1 and 5-2 have not come forward and it can be demonstrated that there will be a shortfall in the waste management capacity required to meet the Boroughs' joint apportionment target as specified in Policy WLWP 1; and*

c. *There is no adverse cumulative effect, when taken together with existing waste management facilities, on the well-being of the local community, including any significant adverse impacts against the WLWP sustainability objectives (see Appendix 1); and*

d. *The proposed site meets the criteria set out in the subsequent WLWP Policies if applicable.'*

6.2.13 The proposed development includes the erection of a temporary 30m by 30m building, a small site cabin and requires additional external space for skip storage, vehicle parking and manoeuvring space for HGVs. The minimum amount of space required for this is approximately 2,000m$^2$. Waste management facilities require significant internal headroom within buildings to allow waste vehicles to operate and tip waste safely. Should an existing building be used, it would be necessary for it to have a minimum height of 10m to the eaves in order to allow safe and effective working. Many existing industrial buildings do not offer sufficient height to the eaves or sufficiently high roller shutter doors, which significantly reduces the number of suitable sites.

6.2.14 Approximately 50% of the Applicant's customer base is within Hillingdon with the remaining 50% being spread out across the adjacent London boroughs and therefore it is important that the proposed site is either within Hillingdon or as close as possible to Hillingdon in order to reduce mileage and travel costs for both waste vehicles and site staff travelling to work. Additional mileage would not only have financial implications on the business but would increase the carbon footprint associated with the collection of waste from customers. Furthermore, the WLWP requires waste management facilities to be located as close as possible to the source of waste arisings.

[8] i.e. the allocated sites specified within the West London Waste Plan 2015.

6.2.15 Unless the existing waste management sites listed in the WLWP are vacant, it is not practical for an existing waste management site to share the required space with a third party operator or to allow the construction of a new building, which would still require the submission of a planning application. Existing waste sites will also operate under an Environmental Permit, which are specific to the operator as well as the site activity. It is therefore considered impractical to share permitted waste sites. The Applicant has already undertaken extensive searches of the local area and has not identified any suitable and vacant sites at the current time. The site which lies to the east of the application site, which is currently operated as a Civic Amenity Site by Powerday plc, is an existing (temporary) waste management facility and is listed within the WLWP as an existing facility. The previous and existing uses within the site have included waste management businesses which are similar in nature to an industrial use and are considered appropriate within the context and setting of the site.

**6.3 Conclusions**

6.3.1 The Applicant has operated a successful skip hire business since 2003 which currently employs 11 staff. The proposed development comprises the construction of a waste transfer facility which would enable waste to be sorted, screened and bulked up so that it can be transported to local re-processors. The business currently recovers approximately 90% of incoming waste for recycling and it is anticipated that the proposed development would enable the Applicant to further increase its waste recovery performance, particularly with the C,D&E waste stream.

6.3.2 The application site is not a preferred (allocated) site within the WLWP, although the site to the east which is operated by Powerday plc is listed as a temporary Civic Amenity Site. The wider Old Coal Depot site is allocated within the Hillingdon Local Plan (Part 2 Site Allocations and Designations) for mixed use development, including residential use. Permission is being sought for a waste transfer station for a temporary period of 5 years. It is considered that this a reasonable period of time which would enable the Applicant to search for an alternative site, and would not preclude the development of the site for mixed use in the future. At the time of writing, it is understood that no detailed proposals have been brought forward for a mixed use on the site. The proposed development is considered to constitute 'meanwhile development' which would maximise the use of this vacant site, whilst detailed proposals are developed for the mixed use of the land.

6.3.3 The proposed development would facilitate the sustainable management of skip waste produced by the business's customers and would contribute towards the waste

management capacity within the West London Waste Plan Area as well as the London Plan's objective of being net self-sufficient by 2026.

## 7 CONCLUSIONS

7.1.1 The application site is currently vacant but lies within the wider Old Coal Depot site, which has a history of industrial uses. The wider site is currently occupied by a mix of businesses. Land to the east is used as a temporary Civic Amenity Site. The site is not allocated within the West London Waste Plan as a preferred waste management site. However, the allocated sites are fully occupied and are not currently available. There are a number of existing waste management sites within the West London Waste Plan Area. However, it is not considered feasible for the Applicant to operate within an existing waste management facility, given the required space and footprint of the proposed building and the lack of availability of vacant sites.

7.1.2 The NPPF states in paragraph 8 that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives; economic, social and environmental. The economic and social objectives would be met through the retention of 11 existing jobs within the business, the provision of 5 additional jobs and the contribution towards the local economy. The business also serves a range of residential and commercial customers and provides a reliable and valued waste management service within the community. The environmental objective of sustainable development is to '*protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution…*'. The proposed construction and use of a temporary waste transfer station satisfies this objective through the effective use of a vacant site for a temporary period, maximising the potential for waste materials to be recycled, minimising waste and pollution through sustainable waste management measures and ensuring high environmental standards. The recovery of waste through the sorting and bulking process also ensures that as much waste as possible is diverted from landfill, which is a key objective at both a national and local policy level.

7.1.3 A Noise Assessment has been prepared and accompanies this planning application. The Noise Assessment has demonstrated, in the context of nationally recognised standards and planning guidance, that the effects of identified sources of noise being emitted from the site would not give rise to a significant adverse impact.

7.1.4 An Air Quality Assessment has also been prepared and accompanies this application. The site lies within an Air Quality Management Area. The significance of fugitive dust

impacts, as a result of emissions from the facility, was predicted to be negligible at all receptor locations. The Institute of Air Quality Management (IAQM) guidance states that only if the impact is greater than 'slight' is the effect considered significant. As such, impacts are considered to be 'not significant' in accordance with the stated methodology. The potential impacts associated with road traffic exhaust emissions was also assessed. The assessment concluded that impacts on annual mean $NO_2$, $PM_{10}$ and $PM_{2.5}$ concentrations were predicted to be negligible at all sensitive receptor locations. Following consideration of the relevant issues, air quality impacts as a result of road vehicle exhaust emissions associated with the operation of the development were considered to be 'not significant'.

7.1.5 Consideration has been given to the potential for unacceptable effects on the landscape and on visual amenity. The assessment of potential effects concluded that the proposed waste management building would not give rise to any unacceptable effects on the landscape character of the locality or on the visual amenity of nearby receptors.

7.1.6 The planning application is accompanied by a Transport Statement. Based on the maximum quantity of waste that would be allowed under the proposed Standard Rules Environmental Permit (which is considered to be a worst case scenario), the waste transfer station would result in an average of 99 HGVs per day (Monday to Friday with a lower number on Saturdays). Whilst the actual vehicle numbers are likely to be much lower, the TS concluded that the proposed development would not give rise to any unacceptable effects on the public highway in terms of capacity or safety.

7.1.7 The proposed waste transfer station would be temporary in nature for a period of 5 years after which time all buildings would be removed from the site and the land reinstated.

7.1.8 At the heart of the NPPF is the presumption in favour of sustainable development for proposals which are in accordance with the Development Plan. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission should be determined in accordance with the provisions of the Development Plan unless material considerations indicate otherwise.

7.1.9 The Planning Statement and supporting assessments have demonstrated that the proposed development is, on balance, in accordance with the Development Plan for Hillingdon and there are no material considerations which indicate otherwise.

## DRAWINGS

Site Location Plan

Planning Application Boundary

Site Plan

Block Plan

Elevations

## APPENDICES

Appendix A Sound Level Assessment (Sharps Redmore, November 2023);

Appendix B Air Quality Assessment (Redmore Environmental, December 2023)

Appendix C Landscape and Visual Technical Note, November 2023)

Appendix D Transport Statement (Cora IHT, November 2023)

**Appendix A** Sound Level Assessment (Sharps Redmore, November 2023);

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