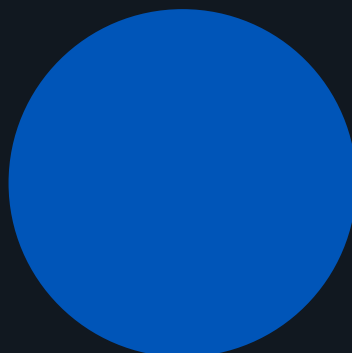
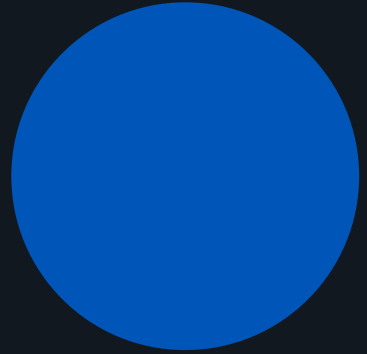
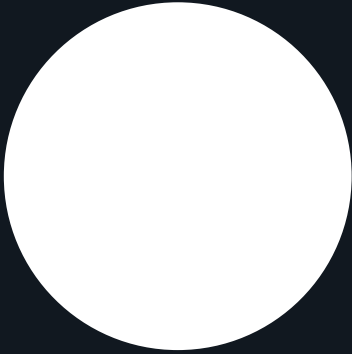




PLANNING STATEMENT (AUGUST 2020)

**Quattro UK – Land forming part of Former Western International
Market Site, Southall Lane, Hayes, UB2 5XJ**

Firstplan Ref: 16011/VW/jc

Date: August 2020

CONTENTS

Section 1	Introduction	4
Section 2	Background Information	6
Section 3	Description of Proposals and Operational Statement	14
Section 4	Planning Policy	24
Section 5	Relevant Planning Considerations	34
Section 6	Summary and Conclusions	45

SECTION 1: INTRODUCTION

1.1 This Planning Statement has been prepared by Firstplan Ltd on behalf of our client, Quattro UK Ltd ('Quattro'), in support of a planning application at Land Forming Part of Former Western International Market Site, Southall Lane, Hayes, UB2 5XJ.

1.2 Planning permission is sought for:

"Erection of construction and demolition waste recycling facility, concrete batching plant and associated weighbridge, weighbridge office, site office and welfare facilities, storage bays, substation, car and HGV parking and other ancillary structures, and use of land for fleet parking (works applied for retrospectively). Consent sought for temporary period ending 21 December 2027".

1.3 The application follows the grant of planning permission under application ref: 01032/E/P44, decision dated 18 January 2018, for substantially the same form of development, and comprising:

"Erection of a construction and demolition waste recycling facility, concrete batching plant and associated weighbridge, weighbridge office, and welfare facilities, storage bays, car and HGV parking and use of land for fleet parking. Consent sought for a temporary period of three years".

1.4 For the reasons detailed within this Statement, and principally relating to a reduction in the available developable area, alterations had to be made to the scheme as approved in 2018 at build out stage. Further to discussions with London Borough of Hounslow (LBH) Officers and for operational reasons – the built-out scheme has been further reviewed and additional works have been proposed to further enclose/clad elements of scheme, provide additional boundary treatment and relocate certain facilities. These additional works had been expected to be completed prior to the submission of this application – but have been held up by the impact of the Covid-19 Coronavirus and restrictions this has placed on site working. However, the application has been made and assessed on the basis that all of the works as detailed on the submitted plans will be fully built out.

1.5 It was the view of the applicant that the changes to the site layout and approved structures could have been dealt with by means of a S73 application coupled with a separate application for the small number of new ancillary structures erected. However, via discussion with LBH it was agreed that a new full retrospective application would be made for the retention of the scheme as now built out.

1.6 The preparation of the original planning application was fully informed by a range of relevant planning and environmental considerations and reflected pre-application advice received prior to submission. The original application scheme was further amended whilst it was under consideration and particularly in light of discussions with adjoining/neighbouring uses (Costco and the Virtus Data Centre). These relevant considerations and the principles established by the 2018 permission have all been translated through to the amended scheme now being applied for.

- 1.7 A range of conditions were attached to the 2018 permission which required further details to be submitted. Applications had already been made to discharge the majority of these conditions, with some approved and some pending determination. Those applications pending determination have been put on hold whilst this application has been under preparation. This revised/retrospective application seeks to reflect the requirements of the relevant conditions previously imposed and as far as practicable the requisite information has now been provided as part of this application submission. This is with a view to minimising the requirement to attach conditions which require discharging post grant of any new planning permission, particularly given the structures are substantially in place and to ensure as comprehensive an application submission as possible. This is again as agreed with LBH at pre-submission stage.
- 1.8 The 2018 permission was for a temporary period of three years due to end on 18 January 2021. This application additionally seeks an extended temporary period of operation so that the uses can remain on site until 21 December 2027. This is an additional 7 years from the end of the currently consented period. This additional period is required due to the fact that Quattro have not yet secured an alternative site for the uses currently accommodated at the application site and is supported by the fact that the application site is not currently needed for apportioned waste uses.
- 1.9 Relevant background information including a description of the site and surrounding area and relevant planning history is provided at Section 2 of this Statement. The application proposals are detailed at Section 3 together with a summary of changes from the 2018 approved scheme. The planning policy context, which remains substantially unchanged from that in place when the original proposal was approved, is reviewed at Section 4. Relevant planning considerations are addressed at Section 5 and a summary and conclusions are provided at Section 6.
- 1.10 This Planning Statement should be read in conjunction with the accompanying planning application submission drawings, the Design and Access Statement (D&AS) and full suite of supporting technical assessments submitted. Critically it should also be considered in the context of the previous application submission and approval relatively recently granted in January 2018.

SECTION 2: BACKGROUND INFORMATION

a) Site and Surrounding Area

- 2.1 The application site, as identified on Site Location Plan (Ref: H11930-S1A), totals some 1.5 ha in size and is largely rectangular in shape. The development has been substantially completed and is as detailed at Section 3, Description of Development. The application site accommodates: an enclosed construction and demolition waste reception area for incoming waste, enclosed recycling plant and associated recycled material storage bays, a concrete batching plant, cement silos and associated aggregate storage bays, portable office and welfare facilities, weighbridge and weighbridge office. The site is laid to hardstanding with the southern half principally accommodating HGV and car parking.
- 2.2 The site lies on the western side of Southall Lane which runs north to south and forms the eastern boundary of the site and is located approximately mid-way between Hayes Road to the north and M4 to the south. Along the eastern boundary (with Southall Lane) the land is bunded with a number of mature trees running along the full extent. The bund and trees have been retained in full and accommodated by the development as now built out. To the east of Southall Lane lies an office complex, warehouse facilities, the Airlinks Golf Club and the David Lloyd Sports Centre.
- 2.3 The main site access road from Southall Lane (shared with the adjoining Hounslow Household Waste Recycling Facility to the west) forms the southern boundary of the application site. Vehicular access to the site is located centrally along the southern boundary. A pedestrian access route is provided to the south-eastern corner to/from Southall Lane. To the south of the shared access road (but outside of the application site) the land is again bunded with some vegetated areas and comprises part of a larger area of open space extend south and south-west. This land is characterised by grassland and scrub and is designated Metropolitan Green Belt and comprises a 'Safeguarded Minerals Site'. Beyond this open area of land lies the M4.
- 2.4 To the immediate west of the application site is the recently constructed Hounslow Household Waste Facility. This principally comprises a materials handling facility (12 m high), an office building (4m high) and vehicle workshop (8.5m high). As referenced, access from Southall Lane is shared with the Household Waste Site.
- 2.5 Further to the west of Household Waste Facility is the Western International Market redevelopment comprising of a number of large-scale buildings and associated car parking areas. It is understood that the Market operates Monday-Saturday from 2.30am. The western boundary of the Western International Market site is defined by The Parkway (A312). Beyond this is a swathe of undeveloped, heavily vegetated Greenfield land forming part of the River Crane separating The Parkway from substantial residential development forming part of Hayes.
- 2.6 On the northern boundary the development is set 8 m away (south) of the red line to allow for a foul sewer easement. Immediately to the north of the red line is a largescale Costco Wholesale warehouse

and associated car park. To the west of Costco is a large-scale data centre building and further free-standing commercial/retail units facing onto the Hayes Road. On the northern side of Hayes Road are a range of further industrial/commercial and retail uses including Toys R Us, a MOT Centre, and Builders Merchants. Beyond which lies the Grand Union Canal.

- 2.7 The accompanying Design and Access Statement provides a further description of the site and surrounding area. The Transport Assessment provides further detail of the accessibility of the site, road and transport connections.

b) Planning History – Site and Surrounding Area

- 2.8 The application site together with land to the north and east formerly accommodated large structures housing the Western International Market, prior to its re-location to its current home running along the Parkway further west of the application site.

i) Original Quattro Proposal - Application Ref: 01032/E/P44 dated 18 January 2018

- 2.9 The key planning history for the application site is the permission granted on 18 January 2018 for the same uses and substantially the same structures as proposed by this new application. The original application was subject to pre-app consultation, was accompanied by a full suite of technical assessments. The scheme was reviewed and subject to design alterations and additional mitigation (principally additional enclosure, boundary treatment and dust mitigation measures) and assessment whilst the application was under consideration. The application was approved subject to compliance with and discharge of a range of conditions.

- 2.10 In terms of conditions that were attached to the 2018 permission which required further details to be submitted, applications have already been made to discharge the majority of these conditions, with some approved and some pending determination. Those applications pending determination have been put on hold whilst this revised application has been under preparation. The new application reflects and incorporates the key principles established during the preparation and determination of the original application and seeks to include information previously required by condition up front as part of the application submission.

- 2.11 The approved scheme is key to the consideration of the revised application proposals in terms of the parameters it sets for scale and form of development already considered acceptable in this location.

ii) Southall Lane Household Waste Recycling Facility

- 2.12 A full planning application submission was made in February 2016 and registered under application ref: P/2016/0685 proposing a: *“Local Authority Household Waste Facility to receive, handle, bale and store prior to transport of up to approximately 30,000 tonnes of dry recyclable waste (Use Class Sui Generis) at Southall Lane, Hayes, including ancillary office accommodation and vehicle workshop, together with improvements to existing site access, car parking, lighting and associated works”*. This application was subject to a resolution to grant pending referral to the Mayor. Following confirmation from the Mayor

that the LPA could proceed with issuing a decision notice, planning permission was granted by letter dated 31 May 2016.

- 2.13 The Household Waste facility has now been substantially constructed and shares its access route with the Quattro proposal. The facility is referenced in the accompanying design and access statement to assist in considering the Quattro proposals in context of permitted and comparable industrial type development in the immediate proximity of the application site.

iii) Costco

- 2.14 The Costco warehouse located immediately north of the application site was granted planning permission in July 2013 under Application Ref: 01032/E/P38. This permission allowed for: *“Erection of a warehouse club (13,006 sqm) to include provision for tyre installation, sales and other associated facilities as well as associated landscaping and car parking provision”*.

iv) Data Centre, Western International Park

- 2.15 The data centre warehouse located to the north west of the application site was granted planning permission in March 2012 under Application Ref 01302/E/P35. This allowed for: *“Erection of a 15,893 sqm, three storey data centre warehouse with associated parking, single storey gatehouse, new access road, and access onto Hayes Road”*. A number of non-material amendments were approved prior to the scheme being built out.

v) Self-Contained Industrial Units

- 2.16 Planning permission was granted under Application Ref 01302/E/P36 for: *“Construction of trade city development to comprise of 9 self-contained units B1/B2/B8 use and associated works”* on land immediately north of the Data Centre in September 2012.

vi) Airlinks Golf Club Southall Lane

- 2.17 Planning permission was granted by decision notice dated 19 December 2012 under Application ref 01032/F/P20 for *“Landscaping and remodelling of the Airlinks Golf Club”* which is located on the opposite side of Southall Lane to the application site. It is understood that these works have now been completed.

c) Pre-application Consultation (2016 and 2020)

- 2.18 A pre-application advice request was made in July 2016 ahead of the submission of the original planning application. This was followed by a meeting held at the Council offices on 17 August 2016. A written response was issued by letter dated 16 September 2016, with further clarification provided by email dated 4 October 2016.

- 2.19 The pre-app response was helpful in establishing the acceptability in principle of the development, on the basis of it comprising an application for a temporary period.
- 2.20 The pre-app response was also helpful in providing guidance in terms of the range of supporting documentation required, key issues to be addressed and areas where further information and clarification would be helpful.
- 2.21 The pre-application advice received was particularly helpful in terms of assisting in engaging at an early stage with the West London Waste Authority and GLA in terms of considering their likely views on the proposals.
- 2.22 The pre-application advice response confirmed in 2016 that having had initial discussions with the West London Waste Authority and Planning Policy Officers – there was no indication of any immediate plans for the site, and that there was adequate capacity on existing sites for municipal and commercial waste processing in the short term, therefore an opportunity was identified to utilise the spare capacity on the allocated site for an alternative short term use.
- 2.23 Recent engagement in early 2020 with the West London Waste Authority (WLWA) by LBH has indicated that this position has not changed. Having reviewed the proposed additional period of time sought for retention of the structures and previously approved uses, the WLWA have agreed that LBH can extend Quattro's lease to 21 December 2027 subject to a 12 month break clause should the site be required for apportioned waste uses.
- 2.24 As such the application for a further temporary permission to run to 21 December 2027 would not compromise municipal and commercial waste management objectives for the duration of the additional period of operation. The site remains safeguarded for apportioned waste uses and will be available for those purposes at the end of the proposed additional period of operation. The applicant is clear that should it be considered necessary the 12-month break clause in the lease could be reflected in a S.106 Agreement.
- 2.25 Pre-application discussions with officers at LBH in early 2020 has also established that the new application submission would provide as far as practicable all information previously required and submitted to discharge conditions attached to the original planning permission. These details to be where necessary appropriately updated to reflect the amendments to the scheme. This has been provided in the application submission documents.
- 2.26 It has also been agreed at pre-app stage with LBH that for operational reasons some additional enclosure is required to certain structures erected and to parts of the site boundary. This has been reflected in the application drawings submitted.

d) EIA and Screening

- 2.27 It is noted that the 2018 application was subject to an Environmental Impact Assessment (EIA) Screening Opinion request pursuant to Regulation 5(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended in 2015). That Screening Opinion request was made by letter dated 14 November 2016. The request set out the applicants' reasons for why the proposed development was not considered to be 'EIA Development'. The London Borough of Hounslow's Screening Opinion dated 12 December 2016 confirmed the LPA's determination that it was also of the opinion that the development did not require an Environmental Impact Assessment and the production of an Environmental Statement. The reasons for this decision were stated as:

"This development proposal exceeds the minimum threshold (0.5ha) for facilities for disposal of waste as set out in Schedule 2 (Paragraph 11, section (b)) of the Town and Country Planning Environmental Impact Assessment (amendment) Regulations 2015.

However due to the scale of the depot, its location in an industrial area and the manner in which it will operate it is considered that it is not likely to have significant effects on the environment."

- 2.28 The EIA Regulations have been updated in the interim and now comprise the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. These have been reviewed and it is confirmed that the applicable thresholds for the development 'Installations for the disposal of waste' remain the same as those in effect when the proposals were originally screened. On this basis the proposals do meet the relevant thresholds/criteria in Schedule 2. However, the information contained in this application submission, and previous and detailed consideration of the same proposals, demonstrate that it is not likely to have significant effects on the environment.
- 2.29 The selection criteria for screening Schedule 2 development as contained with Schedule 3 of the updated Regulations 2017 are fundamentally consistent with those against which the proposals were previously assessed under the 2015 Regulations. The new/revised proposals both in terms of structures and operations have not materially altered from that originally screened.
- 2.30 Potential for cumulative impacts have been reviewed again with regard to 'committed' schemes which could potentially come forward over the same planning period as the proposed development. On the basis of the approach previously adopted, these would comprise consented schemes that are subject to a high degree of certainty of being delivered (i.e. a resolution to grant planning consent as a minimum). No such committed schemes within a 500 m of the red-line boundary of a similar nature or scale have been identified via search of the relevant LPA planning portals. The Household Waste Recycling Facility has been built out in the interim since the original Screening. However, the original application screening and assessment was progressed in the full understanding that that proposal was coming forward. The recycling facility had already been consented prior to the original screening request being made.
- 2.31 Reference is made below to the fact that proposals are being brought forward for mineral extraction of land immediately to the south of the application site. These proposals are however still at an early stage

and no formal planning application has yet been made. The current application for retention of the waste recycling facility and concrete batching plant is a stand-alone application required irrespective of any planning application which may be made for the safeguarded mineral site to the south.

- 2.32 Having regard to the selection criteria in Schedule 3 of the EIA Regulations 2017 for screening Schedule 2 development, and the fact that the proposals have not altered in any material way from that subject to the original Screening Opinion, nor indeed has the site context, it is concluded that the development applied for will not result in any significant environmental effects. On this basis it remains the case, and consistent with the LPA's determination in 2016, that the proposals are not EIA development.
- 2.33 Having regard to the above and as part of their consideration of the application the LPA are asked to formally screen the application proposals.

e) The Applicant and their Continued Relocation Requirements

i) The Applicant

- 2.34 Quattro are a highly experienced operator in the construction industry providing services covering the following sectors:
- Waste Management and Recycling
 - Supply of Ready Mixed Concrete
 - Primary and Secondary Aggregate Supply
 - Land Remediation and Agriculture Services
 - Haulage
 - Plant Hire.
- 2.35 In the specific context of the application proposals it is highlighted that Quattro have over thirty years' experience of recycling and the reclamation of construction and demolition waste and consider themselves to be market leaders in this field.
- 2.36 In terms of the supply of ready mix-concrete Quattro pride themselves in the operation of accredited, computer-controlled plant and a modern fleet of mixers.

ii) Relocation of Existing Recycling Operation from Lionel Road

- 2.37 As the LPA will be aware, Quattro were offered terms to lease the Southall Lane application site from Hounslow Borough Council (Estates Department) in 2016. The application site was offered to Quattro to assist with the relocation of their existing construction and demolition (C&D) waste recycling facility which at the time of the original application was located at Lionel Road South, Brentford, TW8 OJA. The relocation of Quattro from that site was required to assist with the progression of a Compulsory Purchase Order (CPO) for the Brentford Football Club redevelopment comprising the construction of a new stadium and 900+ flats. Under the terms agreed with LBH, phased withdrawal/demobilisation of the Lionel Road site was completed by 31 October 2017.

- 2.38 It is relevant that Quattro had operated their recycling operation from the Lionel Road site for over 12 years. The site operated under a Lawful Development Certificate (CLEUD) granted by Hounslow Borough Council in August 2007, Application Ref 00703/A/LAW2. This confirmed that:

“The London Borough of Hounslow at the Local Planning Authority hereby certify that on the 2nd August 2007 the continued use of the land (as identified on the attached plan) for waste storage, transfer and recycling is lawful within the meaning of section 191 and 192 of the Town and Country Planning Act.”

- 2.39 As confirmed in the context of the original application submission, Quattro’s Lionel Road recycling plant and associated facilities processed in the region of 150,000 tonnes of C&D waste per year.
- 2.40 Quattro had found it, and continue to find it, extremely challenging to find an alternative site for their Lionel Road operation. The ability to relocate that operation to the Southall Lane application site for a temporary period of three years, as originally applied for and granted, provided them with a short period of additional time to secure a permanent alternative location and secure the necessary planning permission. In that time period, the temporary relocation also allowed them to safeguard the jobs associated with the Lionel Road operation and has enabled Quattro to maintain continuity of service to their customer base. This has critical to safeguarding the business.
- 2.41 It is noted that the Lionel Road facility was located within the London Borough of Hounslow and that it comprised a within borough relocation. As detailed in the original application any impacts and effects associated with this element of the proposed development cannot be entirely considered as ‘additional’ or ‘new’ within the context of the London Borough of Hounslow.
- 2.42 Despite concerted efforts Quattro have still not been able to identify a relocation site for the C&D recycling facility. Appropriate locations for waste uses are challenging to secure and are compounded by the fact that operators are often competing for land against higher value land uses.
- 2.43 It is clear that the ability to retain the current C&D recycling operations on site at Southall for a further temporary period, which were displaced solely to assist LBH in progressing the Brentford Football Club redevelopment, is critical to safeguarding an established local business and a significant number of associated jobs.

iii) Co-location of CBP

- 2.44 As was considered acceptable by the grant of the original 2018 permission, Quattro have co-located a CBP with the recycling facility due to the operational and sustainability advantages that running these two types of plants in close proximity offers. Principally they allow greater scope for a managed loop process for HGV movements (reducing the overall number). It also allows for the CBP to be directly fed a proportion of recycled aggregate from the on-site recycling facility which has the dual advantage of reducing associated HGV movements and the sustainability advantages of using recycled material in the batching of concrete as opposed to primary aggregate.

- 2.45 As was previously confirmed within the original application submission, Quattro also had an urgent operational need to secure a new concrete batching plant location as one of their existing facilities at Park Royal was at the time under CPO threat as a result of HS2 requirements. Quattro had been involved in petitioning against the CPO but were not ultimately able to secure the retention of their CBP. Quattro completed vacation of their Park Royal site on 23 November 2018.
- 2.46 In the intervening period, Quattro have had more success in terms of progress in securing an alternative site for the Park Royal concrete batching facility. A site at Acton Goods Yard has been identified although it has still not been formally secured. Proposals are at advanced planning application stage having secured a resolution to grant planning permission at planning committee subject to completion of a S106 agreement. The Acton Goods Yard proposals have been with the respective LPA for over a year and a half. Until planning permission is formally granted, conditions discharged and the replacement facility built out the Southall Lane application site similarly remains key to safeguarding the business and associated jobs. Once the Acton facility built out it is anticipated that this will reduce activity associated with the Southall CBP by about 25%. However, given that there is clear demand for a supply of concrete in this location and the sustainability benefits and advantages of having a CBP operating alongside the C&D recycling facility it is proposed to retain the CBP in place for the same period of time as the recycling facility.

iv) Future Requirements and Opportunities

- 2.47 For background information purposes it is confirmed that Quattro has secured an option to work sand and gravel from the adjacent site to the south of the application site within the MOL. This comprises an area of land owned by LBH and a 'safeguarded minerals site'. A separate application is at the early stages of being prepared by Quattro to work that area of land. If that development proposal were to be approved the intention would be that the mineral extracted would be directly fed to the adjoining concrete batching plant (as well as being sold direct to the wider construction market). The ability to be able to directly feed the CBP would give rise to significant HGV road mile and emissions savings by not having to import mineral by road to the plant.
- 2.48 However, as the mineral extraction application has not yet been submitted, this application for retention of the CBP, together with the waste recycling facility, for the additional temporary period sought has been assessed on the basis of it being a fully road served facility. However, in the future there are prospects the plant could be more sustainably fed by virtue of being located adjacent to a mineral extraction site.
- 2.49 As detailed in the Planning Policy review the emerging Local Plan position does offer some prospect of a longer term solution for a permanent site to be secured for the C&D recycling facility and the CBP on the basis of proposed release of Metropolitan Green Belt land to the south (the safeguarded minerals land) and allocation for industrial use. However, the Local Plan review is at an early stage. The temporary period sought for retention of the uses does provide the applicant with an opportunity to continue to search for and secure a permanent relocation site elsewhere but at the same time allows time for the Local Plan to be progressed and if adopted in the form currently envisaged – it could provide a permanent relocation site in close proximity to the existing facility. Potentially this could be realised well in advance of the end of the 7-year period proposed.

SECTION 3: DESCRIPTION OF DEVELOPMENT

(Amendments to previously approved scheme)

- 3.1 The following provides a description of the revised application proposals and layout. This should be read in conjunction with the Design and Access Statement. Further details in terms of the operation of the site are provided in the accompanying ‘*Operational Statement (Including: Site Monitoring and Management Scheme and Pest Control Measures)*’ (August 2020) prepared by Waterman Infrastructure and Environment Limited. The application is also further detailed as relevant in the suite of accompanying technical assessment submitted.

a) Summary of the Application Proposals

- 3.2 The retrospective application proposals are entirely reflective of those applied for in 2016 and as granted planning permission in January 2018. I.e. for the same range of uses and principal structures.
- 3.3 The application site, as identified on Site Location Plan (Ref H1930-S1A), totals some 1.5 ha in size (previously 1.7ha) and is largely rectangular in shape. The application is retrospective as the development has been substantially completed and accommodates: *an enclosed construction and demolition waste reception area for incoming waste, enclosed recycling plant and associated recycled material storage bays, a concrete batching plant, cement silos and associated aggregate storage bays, portable office and welfare facilities, weighbridge and weighbridge office. The site is laid to hardstanding with the southern half principally accommodating HGV and car parking.*
- 3.4 Further to discussions with LBH Officers and for operational reasons – the built-out scheme has been further reviewed and additional works have been proposed to further enclose/clad elements of scheme and relocate certain facilities. These additional works had been expected to be completed prior to the submission of this application – but have been held up by the impact of the Covid-19 Coronavirus and restrictions this has placed on site working. However, the application has been made and assessed on the basis that all of the works as detailed on the submitted plans will be fully built out.
- 3.5 The proposals, as was previously the case, also allow for the parking of Quattro fleet HGV’s over-night. However, this has been reduced from 50 as previously proposed to 35.
- 3.6 The final element of the application proposal is that it additionally seeks an extended temporary period of operation to that previously approved so that the uses can remain on site until 21 December 2027. The 2018 permission was for a temporary period of three years due to end on 18 January 2021. The proposal is therefore for an additional 7 years from the end of the currently consented period.
- 3.7 The following provides further details of the application proposals by particular reference to where alternations have had to be made to the approved scheme and where the proposals remain the same.

b) Red-Line and Developable Area

- 3.8 During the course of the original application being considered the area available for development within the red-line was altered due to a 14m wide strip of land along the western boundary needing to be retained by LBH. Amendments to the layout were made at that time with that area of land left clear under the approved plans.
- 3.9 Post the grant of planning permission in addition to the already lost 14 m strip on the western boundary, a further 3m strip of land along the full extent of the western boundary was additionally found to not be available and comprises part of the Household Waste Facility. This land has now been additionally omitted from the red-line boundary together with reconfiguration of the red-line at the south-eastern corner. This has resulted in the red-line area reducing from 16,695 m² to 15,320 m².
- 3.10 The developable area of the site was further reduced at detailed design stage as a 10m wide area of land on the northern half of the eastern boundary (boundary with Southall Lane) was retained as an existing bunded, vegetated and treed area principally for better screening and distance between the road and the development beyond. This area however been retained within the red-line area and is actively maintained by the applicant.

c) Site Layout and Form of Development

- 3.11 The revised site layout is detailed on plan reference H11930-11R (previously approved plan ref: 2711/11A). The key principles in terms of layout as established by the 2018 permission remain the same. This means that broadly the site is split in thirds north to south as follows:
- The northern third of the site accommodates an 8 m easement along the full extent of the northern boundary for a foul sewer. The main plant/operational structures run east to west immediately south of this easement.
 - The central third of the site comprises open manoeuvring space for HGVs, mixers and frontend loaders serving the concrete batching plant and recycling facility and associated storage.
 - The southern third of the site accommodates all the ancillary facilities including: HGV and car parking, cycle storage, weighbridge, weighbridge office, welfare and office facility.
- 3.12 Access is gained as per the approved scheme from a central point on the southern boundary via a shared access road from Southall Lane. The internal access route runs south to north through the centre of the site.
- 3.13 The reduction in the developable area (loss of land on eastern and western boundary) and operational requirements has resulted in some alterations to the layout and form of the previously approved structures. Key features of the development as now proposed are as follows:

- All structures running along the northern boundary, comprising the building for out-going waste, recycling plant (picking station), building for incoming waste and concrete batching plant (CBP), have been pulled away from the eastern boundary (boundary with Southall Lane) to allow full retention of the vegetated/treed area resulting in:
 - End-of line building relocated 10 m to west, and recycling plant (picking station) and end of line building reduced in length from 47 m to 28 m; height of picking station unchanged at 6.3m; height of end of line building increased from 6.4m to 7m at eaves and 7.4 at ridge.
 - End of Line building extended along eastern boundary by addition of enclosed recycled material stock bays. Length 25m, height 7m at eastern boundary (rear), 7.4m on western elevation (front), and replacing 12m long, 3.5m high sleeper/steel wall previously proposed in this location.
 - Building for incoming waste relocated 9 m to west and re-orientated so entrance faces east (rather than south). Dimensions reduced from: Length along entrance (south) façade 34m x Width 30m previously approved to Length along entrance (east) façade 31 m by Width 30m; Height to ridge and eaves remain the same at 10.8m and 9m respectively.
 - CBP relocated 11m to west, with minor alterations to footprint and addition of 1 cement silo; max height remains the same at 14.95m.
 - Aggregate storage bays relocated from western boundary due to insufficient space (due to reduction in width of site) to south of CBP running east-west; Length increased from 26m to 33m, height to max point (front) increased from 5.4m to 7m; Additional aggregate storage bays provided immediately adjacent to southern façade of incoming waste building – Length 24m, height at max point 7m;
- New 5m high concrete wall with 2m metal sheeting above with cranked canopy and automated sprinkler system proposed to additionally enclose operational area on eastern boundary; 5 m high concrete wall and automated sprinkler system to extend centrally into the site from the eastern boundary to separate operational activity and the weighbridge/parking area to south.
- Remainder of site boundary treatment, sleeper and steel wall to eastern and northern boundary remains unchanged.
- Weighbridge office relocated from centre of weighbridge to east of weighbridge and raised up on stilts. Weighbridge office dimensions amended from H 3.8m, L 12m, W 4.5m – amended to H 7.3m (comprised of 3.9m stilts and 3.4m high cabin above), L 12m, W 8m.
- New separate internal barrier controlled in/out for HGVs accessing the CBP provided west of weighbridge.
- Welfare/Office building increased in length from 11.2m to 18.3m and width from 7.2 –to 9.3 m. Height remains unchanged at 7.3m.
- New low level site security offices provided to southern boundary between welfare office building and internal site access (H 3.8m, L 8m, W 5m);
- Amendments to car and HGV parking layout, including reduction of car parking spaces from 37 to 26 and reduction in HGV parking spaces from 36 to 25.
- Cycle storage location and provision of 20 cycles and 1 adapted cycle space remains unchanged.
- Amendments to pedestrian walking routes and provision of new pedestrian access point to south-eastern corner of site.
- Amendments to drainage scheme to reflect reconfigured site layout.

- Substation (previously approved under separate application ref: 01032/E/P46 dated 10 May 2018) relocated 3m northward on eastern boundary (footprint and height remain the same as previously approved).
- New switch room located centrally on eastern boundary adjacent substation.

- 3.14 Similarly to the approach by the adjacent waste depot proposals, and as was the case with the 2018 scheme, the main substantial structures that comprise the facility have been located in a manner to ensure impact on the Metropolitan Green Belt land to the south of the site are minimised. The more open areas (principally parking) are located to the southern half of the site. On this basis the built form is viewed as visually consistent and in the context of the warehouse style buildings on the northern boundary.
- 3.15 As detailed in the original application scale and massing of the proposed plant and structures is largely dictated by standard plant and process requirements. However, the bulk and scale of the proposed plant has been kept to a minimum where possible. The scale of the main structures has remained largely in accordance with that previously approved – with changes made to the configuration only where lack of space or need for additional mitigation/improved operation have been identified.
- 3.16 In design terms/finish the proposals have adopted the approach previously approved in terms of materials, colour and form of development (silhouette). Additional enclosure to some of the structures and at various points on the boundary has been provided and is proposed for additional mitigation and operational purposes.

d) Operational Information, Material Throughput and Fleet Parking

i) Waste Recycling Facility

- 3.17 The main elements of the waste recycling facility remain as previously approved and comprise the enclosed building for incoming waste and recycling plant (picking station). Key elements of the facility comprise a screen and conveyor, large picking station, trommel screen, small picking station, debris catcher and small picking cabin. Associated storage bays for recycled material are enclosed on three sides with an overhead canopy. The storage bays benefit from an automated sprinkler system located on the edge of the canopy.
- 3.18 The C&D recycling facility became operational in September 2019. As was stated in the original application submission Quattro anticipate they will import and process 150,000 tonnes of C&D waste per year. Equating to an average of 2,885 tonnes per week.
- 3.19 C&D waste brought to site primarily comes from the A4/M4 Corridor and Heathrow and is picked up from construction sites within this area. It is imported by a variety of sized vehicles predominantly ranging from 7.5 tonne to 16 tonne grab lorries.
- 3.20 Around 19,500 tonnes of high-grade recycled aggregate is supplied by the recycling facility for use in the co-located concrete batching plant. This comprise 15% if the aggregate requirement for the CBP.

The remainder of the recycled material which includes recycled sand and various grades of singles is distributed by Quattro to service local contracts or customers. This material is loaded directly from the stock bays by front end loaders onto vehicles comprising 32 tonne or 44 tonne HGVs and transported to the respective delivery site. Residual waste is transferred to landfill for final disposal.

ii) Concrete Batching Plant

- 3.21 The concrete batching plant remains very much in keeping with that previously approved other than an additional and discretely placed cement silo has been added.
- 3.22 The CBP became operational in July 2018. In the 12 months to March 2020 the plant produced 65,000 m³ of concrete. In the original application submission, it had been expected that the plant, in reflection of anticipated demand in the area, would produce in the region of 50,000 m³ of concrete per year. Quattro expect that 65,000 m³ will be the maximum output of the plant over a year going forward. Indeed, should they gain planning permission for their new facility at Acton Goods Yard (application currently pending determination) Quattro would expect to see a fall in output from the Southall plant of some 25%.
- 3.23 To service an output of 65,000 m³ of concrete per year in the region of 130,000 tonnes of sand and stone is require per year (previously 100,000 tonnes). In the region of 19,500 tonnes of cement and admixture are required (previously 15,000 tonnes).
- 3.24 As detailed above the waste recycling facility is able to supply the CBP with 15% of its requirement for aggregate in the form or recycled aggregate, amounting to some 19,500 tonnes of material per year. The remaining aggregate and cement requirement is imported to the site by HGV and tanker respectively.
- 3.25 In terms of how the plant operates: aggregate, sand and stone are fed into the ground feed hopper by front end loader. Aggregate is then transferred via covered conveyor up into the concrete batching plant. Cement is supplied to the plant via road tanker and transferred under pressure by sealed pipe directly into the storage silos. Sand, stone, cement and water are then mixed by a computer-controlled process within the concrete batching plant and dropped pre-mixed into the waiting mixer truck below for onward distribution by road.

iii) Quattro Fleet Parking and Operational Advantages

- 3.26 The proposals allow for the parking of 35 Quattro fleet HGV's over-night (compared to the 50 originally anticipated). This has been reduced to 35 as it was clear once the site opened that there were operational issues associated with local highways conditions with having all 50 HGVs parked on site overnight. Nonetheless, the fleet parking plays a role in the supply and delivery of material to and from the site.
- 3.27 The majority of fleet HGV's movements leaving the site in the morning are utilised to assist with clearance of residual waste to landfill or supply of recovered waste to supply sub-base contracts. Where possible fleet HGV's are managed to return to site in the evenings loaded with aggregate to feed the

CBP. Minimising the number of times that HGV's leave or enter the site un-loaded has clear economic benefits to the applicant but also has clear sustainability advantages in terms of minimising HGV movements.

e) Trip Generation

- 3.28 The trip generation of the site has been determined from traffic surveys undertaken in March 2020. The traffic surveys recorded the number and type of vehicles entering and exiting the site across a 24-hour period. These are fully detailed in the accompanying Transport Assessment prepared by i-Transport.
- 3.29 The trip movements have been compared with those estimated in the 2016 planning application and a summary of those results is replicated at Table 1:

Table 1: Trip Generation Comparison (Source Table 5.4, i-Transport Transport Assessment, June 2020)

	Daily (two-way) Traffic 24hr		
	2016 Estimates	2020 Counts	Difference
Staff/ Non-HGV Traffic	148	81	- 67
HGV Traffic	228	261	+33
<i>Construction and demolition</i>	156		
<i>Concrete batching plant</i>	72		
Total	376	342	-34

- 3.30 The table demonstrates that the site is currently operating on a whole below the estimated figures set out in the 2016 application. The HGV traffic (relating to the C&D recycling and CBP) is currently operating at a greater volume than the estimates contained within the 2016 application.
- 3.31 The differences in estimate and surveyed trip generation are accounted for by two factors. First, that there has been an increase in the annual throughput of the concrete batching plant from that previously envisaged (an increase in production from an estimated 50,000 m³ to 65, 000 m³). The second is that the 2016 figures assumed an even spread of activity per working day across the year. In reality, some days will be busier than others depending on demand and local road conditions (i.e. some days there would be lower numbers of vehicles and other days would be higher).
- 3.32 As detailed in the Transport Assessment, Quattro have confirmed that on the day of the traffic survey, vehicle flows, and outputs were higher than usual/average. As such the vehicle trips recorded in March 2020 represent a robust assessment of the traffic flows generated by the site.

f) Employment Generation

- 3.33 As detailed in the 2016 application submission the Southall Lane site was intended to act as Quattro's new main hub and accommodate in the region of 165 employees. Ultimately, due to operational issues and timing of the loss of the CPO'd sites, a number of staff and fleet drivers have been re-deployed at other Quattro facilities whilst a permanent relocation site is secured. The site is now operational and accommodates 85 employees. This includes plant managers, operatives, batchers and shovel drivers for the picking station and concrete batching plant and associated HGV drivers as well as support staff.
- 3.34 Whilst the on-site employment numbers have reduced from those originally anticipated it is important to reiterate that the development has nonetheless facilitated the relocation of two Quattro operations at risk due to CPO – and the safeguarding of those associated and still significant number of jobs.
- 3.35 The site is well served by bus routes – the nearest bus stops in easy walking distance on Southall Lane.
- 3.36 On this basis and reflective of the reduced numbers of employees based at the site parking provision has been made for 26 car parking spaces, including 1 blue badge space (a reduction from the 37 previously approved).

g) Hours of Operation

i) Waste Recycling Facility

- 3.37 Hours of operation for the waste recycling facility – in terms of processing waste are 7am – 6pm Monday – Saturday. However, as considered acceptable as part of the original approval (i.e. there are no working hours restriction on the existing planning permission), for Quattro to be able to run the operation responsively to customer requirements they need to be able to receive material 24 hours a day, 7 days a week. Whilst the majority of material is brought to site during the normal working day, the flexibility to receive material 24/7 is an important element of the operation.

ii) Concrete batching Plant

- 3.38 As previously proposed and approved, hours of operation for the concrete batching plant are - 24 hours, 7 days a week. This is required to service anticipated market requirements and enable flexibility to service a full range of contracts. However, whilst the ability to operate 24 hours is important as Quattro previously expected and detailed in the original application for at least 75% of the time the concrete batching plant operates during normal working hours of 7am-6pm Monday to Saturday. The requirement to be able to operate over 24 hours applies only to the batching plant itself (i.e. the batching of concrete and filling of mixer trucks). The 24-hour operation is not required for supplying aggregate to the plant either from the recycling plant or by road served deliveries. The plant has sufficient integral capacity to be stocked up during the working day and have sufficient stored material to run through the night as and when that is required. The additional cement silo proposed as part of this application similarly means there is sufficient on-site storage of cement to avoid the need for deliveries of cement outside of the core working hours.

h) Information Required by Conditions Attached to 2018 Permission

- 3.39 A range of conditions were attached to the 2018 permission which required further details to be submitted. Applications were made to discharge the majority of those conditions. A number have been approved and some are pending determination. Those applications pending determination have been put on hold as agreed with LBH whilst this application has been under preparation. This revised/retrospective application seeks to reflect the requirements of the relevant conditions previously imposed and as far as practicable the requisite information has now been provided as part of this application submission. This is with a view to minimising the requirement to attach conditions which require discharging post grant of any new planning permission, particularly given the structures are substantially built out and in place and to ensure as comprehensive an application submission as possible. This is again as agreed with LBH at pre-submission stage.
- 3.40 Table 2 at the end of this section provides a summary of the position in respect of conditions previously imposed and information submitted as part of this application to address those requirements.

i) Temporary Permission and Restoration of Site

- 3.41 In the context of the site allocation for apportioned waste uses it is key to underscore that the proposal is for a temporary period of 7 years only – from the end of the currently consented period which runs to January 2021.
- 3.42 The form and type of structures previously approved and now erected are relatively easily demountable and removable from site. Indeed, the plant have been selected on this basis. It remains the case that the applicant would be in a position to remove all structures and leave the site cleared and laid to hardstanding within a period of 12-16 weeks (dependent on time of year/weather conditions) from cessation of waste recycling and concrete batching operations at the end of the seven year operational period which is sought.

Table 2: Information provided by 2020 application to address requirement of conditions imposed on 2018 permission ref: 01032/E/P44

Con No.	Summary of Condition Requirement	Updated/Revised Submission for 2020 Application
2	Samples of materials to be used in the construction of the external surfaces of each respective structure	Details of materials were previously provided in the form of annotated stock images and approved by LBH. As all main site structures have now been substantially constructed, annotated photographs of the structures as built are provided within the D&AS (July 2020). The same materials as those previously approved have been utilised.
4	Hard and Soft Landscaping Details	Details were previously submitted to discharge this condition and approved by LBH. These have been updated to reflect the amended proposals and details are provided by application drawing ref: • <i>H11930-PC7 Rev E, Landscaping Plan</i>
5	Boundary Treatment Details	Details were previously submitted to discharge this condition. These have been updated to reflect the amended proposals and are provided by application drawing ref: • <i>H11930-PC1 Rev C, Boundary Treatment</i>
6	Cycle Parking Details	Details were previously submitted to discharge this condition. These have been updated to reflect the amended proposals and are provided by application drawing ref: • <i>H11930-PC2 Rev G, Cycle Parking</i>
7	Vehicle Parking Details	Details were previously submitted to discharge this condition. These have been updated to reflect the amended proposals and are provided by application drawing ref: • <i>H11930-PC3 Rev D, Disabled Parking</i> • <i>H11930-PC5 Rev F, Access Arrangements</i>
8	Submission of: • Car park management Plan • Servicing Management Plan • Vehicle Routing Plan • Construction Management Plan • Plan/details showing the spread of vehicle movements from the site demonstrating the site operates in a manner to minimise impact on the surrounding highways network • Wheel Wash Details	Details were previously submitted to discharge this condition and approved by LBH. These have been reviewed and updated in light of the amended site layout/proposals. The following is provided: • Car Park Management Plan – i-Transport [June 2020] • Servicing Management Plan – i-Transport [June 2020] • Vehicle Routing Plan – Figure 5.1 of Service Management Plan • Plan/details showing the spread of vehicle movements from the site demonstrating the site operates in a manner to minimise impact on the surrounding highways network (Section 4.1 of SMP) • Drawing ref: <i>H11930-PC4 Rev F, Wheel Wash</i> Note: A Construction Management Plan has not been re-provided as the development has been substantially completed.
9	Site Noise Report - detailing noise resulting from the operation of the facilities and	An Acoustic Technical Report was previously submitted to discharge this condition. This has been reviewed and updated in light of the amended site layout/proposals. Relevant information and details have been provided within:

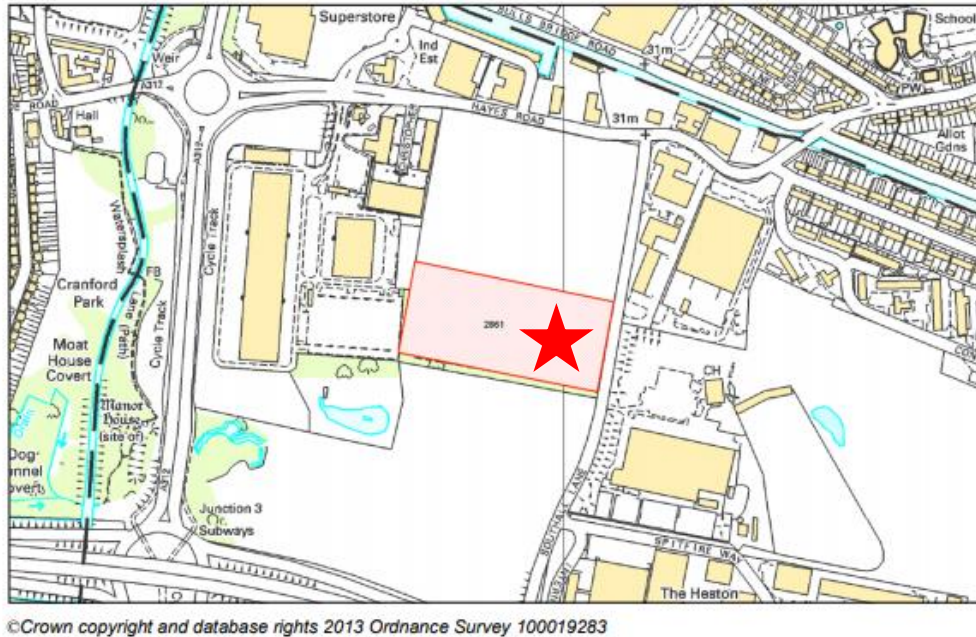
	proposed mitigation measures.	Acoustic Technical Report – MLM [June 2020]
10	Car, Cycle, Pedestrian and Disabled Access Arrangements	Details were previously submitted to discharge this condition. These have been updated to reflect the amended proposals and are provided as follows: Drawing Ref: <i>H11930-PC5 Rev F, Access Arrangements</i>
11	Drainage Arrangements	Details were previously submitted to discharge this condition. These have been updated to reflect the amended proposals and are provided as follows: - Surface Water Drainage Strategy Marks Heely (April 2020) - Drawing Ref: <i>H11930-01 Rev F</i>
14	Construction Air Quality Management Plan	Details were previously submitted to discharge this condition. These have not been submitted for the revised proposals as the site has been substantially built out.
15	Construction Management Plan	Details were previously submitted to discharge this condition and approved by LBH. These have not been submitted for the revised proposals as the site has been substantially built out.
17	Details to demonstrate modular office will achieve minimum energy requirements and the facility meets best practice for sourcing sustainable materials.	Details were previously submitted to discharge this condition. These have been updated to reflect the amended proposals and are provided within: Sustainability and Energy Statement (July 2020)
18	Dust Management and Monitoring Plan	Details were previously submitted to discharge this condition. These have been updated to reflect the amended proposals and are provided as follows: Dust Management and Monitoring Plan (July 2020)
19	Pest / Vermin Management Details	Details to satisfy the requirements of Conditions 19, 20 and 21 and as applicable to the revised application proposals are provided as one composite document as follows: Operational Statement and Site Monitoring and Management Scheme (August 2020)
20	Site Operational Statement	
21	Site Monitoring and Management Scheme	

SECTION 4: RELEVANT PLANNING POLICY

- 4.1 This Section details the key planning policy context relevant to the application site and the revised application proposals. It is entirely relevant that the application follows the relatively recent grant of planning permission for the 2018 scheme which comprises an entirely comparable form of development. This section therefore clarifies the key planning policy considerations whilst also identifying any material policy changes since grant of the 2018 permission and indeed where it has remained the same.
- 4.2 The adopted development plan relevant to the application site remains as was the case when the original application was determined and comprises:
- London Plan Consolidated with Alterations since 2011 (March 2016).
 - Hounslow Local Plan (Adopted September 2015); and
 - West London Waste Plan (WLWP) (Adopted July 2015).
- 4.3 The National Planning Policy Framework NPPF (February 2019) and the National Planning Policy for Waste (NPPW) (2014) are of course also material considerations.
- a) **Site and Surrounding Area – Policy Designations**
- 4.4 It remains the case that the application site does not have any site specific allocation in the Adopted Local Plan Proposal Map. The site is however located adjacent to areas subject to the following designations:
- Locally Significant Industrial Site - to the north and north east of the site;
 - Metropolitan Green Belt - to the south east, south and south west of the site;
 - Advert Special Control Area - to the south east, south and south west of the site;
 - Safeguarded Minerals Site - significant area of land located immediately south of the site.
- 4.5 Again, it remains the case that within the West London Waste Plan the application site forms part of a larger area of land, which includes the now constructed Household Waste Facility, which is identified as Site Number: 2861 and detailed as “Western International Market, allocated for waste management uses”, and comprising an area of 3.2 ha.
- 4.6 The full extent of the allocated site as identified at Appendix 6 of the WLWP is replicated for ease of reference at Figure 1.

Figure 1: Extract from Appendix 6, West London Waste Plan, 2015 (Quattro application site indicatively marked with a red star)

Site 2861 Western International Market, Hayes Road, Southall, Hounslow



b) National Policy

i) National Planning Policy Framework (February 2019)

- 4.7 The revised National Planning Policy Framework (NPPF) was published on 19 February 2019 and sets out the government’s planning policies for England and how these are expected to be applied.
- 4.8 The Framework, at **paragraph 7**, confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. Sustainable development lies at the heart of the Framework.
- 4.9 **Paragraph 8** confirms that the three overarching objectives to achieving sustainable development. In the context of the economic objective – this seeks 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 times to support growth. In the context of the environmental objective – this includes making effective use of land and minimising waste.
- 4.10 Notably, the revisions to the NPPF, as compared to the March 2012 iteration, makes more explicit reference to the importance of supporting business growth and improved productivity.
- 4.11 In the context of building a strong, competitive economy, **Paragraph 80** confirms that: “Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future”

- 4.12 **Paragraph 108** requires that in assessing applications for development, it should be ensured that: appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; that safe and suitable access to the site can be achieved for all users; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety can be cost effectively mitigated to an acceptable degree.
- 4.13 **Paragraph 109** confirms that: Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 4.14 **Paragraph 117** requires planning decisions to promote an effective use of land. **Paragraph 118** goes on to confirm that planning decisions should promote and support the development of under-utilised land and buildings.
- 4.15 The NPPF, **Paragraph 182**, has now introduced the ‘agent of change principle’, requiring that decisions should ensure that new development can be integrated effectively with existing businesses. Unreasonable restrictions should not be placed on existing businesses as a result of development permitted after they were established. This should be relevant to new development coming forward in the vicinity of the application site. Whilst the current approved scheme and that proposed are only for a temporary period, they are reflective of the type of operation and activities that would be expected on a site specifically safeguarded for apportioned waste uses.
- 4.16 In the context of facilitating the sustainable use of minerals **paragraph 203** is clear that it is essential that that there is sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs.
- 4.17 **Paragraph 204(e)**, also in the context of facilitating the sustainable supply of minerals, seeks to ensure that existing, planned and potential sites for the manufacturing of concrete and concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material are safeguarded. This is flagged in the context of the existing facilities having been displaced from sites due to CPO, and that the interim use of this site assists in safeguarding the operations whilst a permanent location is secured.
- 4.18 The revised NPPF offers clear support for the expansion and growth of existing businesses. Significant weight should be given to the benefits associated with this continued investment in Quattro’s operation, both in terms of helping to secure the long-term future of the company, in safeguarding local jobs (the site supports 85 jobs), and contribution to the local construction market of recycled material and concrete. The fact that productive use will be made of a brownfield site which is not currently required for its allocated use and for a temporary period is also a key consideration.

ii) National Planning Policy Waste (NPPW)

- 4.19 National Planning Policy for Waste 2014 continues to provide up to date planning guidance for waste related development in England.
- 4.20 **Paragraph 7** provides guidance for waste planning authorities, comprising considerations when determining waste planning applications. This includes only expecting applicants to demonstrate market need for new waste management facilities where proposals are not consistent with an up to date Local Plan; the need to consider likely impacts on the local environment and amenity and ensure waste management facilities are well designed.
- 4.21 **Paragraph 8**, as an early precursor to the agent of change principle, confirms that when determining planning applications for non-waste development planning authorities should, to the extent appropriate to their responsibilities, ensure that the likely impact of proposed, non-waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities. It is noted in this context that the site has been safeguarded as a waste site for some period of time.

c) Strategic Planning Policy

i) Adopted London Plan Consolidated with Alterations since 2011 (2016)

- 4.22 The London Plan, Consolidated with Alterations since 2011 (2016), as was the case when the original application was determined, forms part of the statutory development plan against which the revised application proposals fall to be assessed.
- 4.23 There are a range of London Plan policies relevant to the consideration of the application proposals, including those dealing with waste, minerals, employment, urban design, sustainable development, air quality, noise and transport.
- 4.24 In particular London Plan **Policy 5.17, Waste Capacity**, and supporting text sets out criteria and guidance for determining waste-related applications. These policies are further refined and detailed in the West London Waste Plan.

ii) Draft London Plan – Intend to Publish Version (December 2019)

- 4.25 The Examination in Public (EIP) on the London Plan was held at the start of 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor in October 2019.
- 4.26 In December 2019 the Mayor issued to the Secretary of State an Intend to Publish London Plan. The Secretary of State responded to the Mayor in March 2020 setting out his consideration of this Plan. The Mayor is currently considering that response and progressing the necessary statutory steps to finalise the Plan.

- 4.27 The review London Plan whilst not yet adopted has reached an advanced stage and can be considered a material consideration in the determination of the revised application.
- 4.28 In line with changes introduced by NPPF2, the draft London Plan now includes draft **Policy D13, Agent of Change** which amongst other things seeks to ensure that activities, including those on industrial and waste sites, are not curtailed by the introduction of new-noise sensitive uses in close proximity. Clearly the principle works both ways and there is a requirement on the noise or potential nuisance generating operation if proposed close to existing noise-sensitive uses to ensure they are appropriately mitigated.
- 4.29 **Policy SI 7, Reducing waste and supporting the circular economy**, continues to set a target, to meet or exceed, of 95% reuse/recycling/recovery of C&D waste in London. Facilities such as that proposed for retention at the application site are key to meeting this target and are a valuable resource.
- 4.30 Overall, in the specific context of this application the Draft London Plan is not considered to raise any new material consideration over and above those in the adopted London Plan. In terms of the range of relevant policy considerations these continue to include waste, minerals, employment, urban design, sustainable development, air quality, noise and transport.

iii) West London Waste Plan (July 2015)

- 4.31 The West London Waste Plan (WLWP) remains unchanged since the determination of the original application proposals. The WLWP sets out the strategy and policies for the sustainable management of all waste produced by the participating boroughs for the period up to 2031.
- 4.32 **Policy WLWP 1, Provision of New Waste Management Capacity**, sets out the need for around 614,000 tonnes of additional annual capacity to meet the apportionment set in the London Plan over the period to 2031. The additional waste capacity is to be delivered on the allocated sites identified in Policy WLWP2.
- 4.33 In terms of “Non apportioned Waste”, the policy confirms that: *Development of management capacity will be supported in principle that contributes towards net self-sufficiency across the Plan area for: Construction, Demolition and Excavation Waste in accordance with the waste hierarchy with particular support for the production of material suitable for use as substitutes for virgin material such as recycled aggregates.* The proposal will directly respond to this policy requirement.
- 4.34 The particular support for production of material suitable for use as substitutes for virgin material - is outlined at para 4.4.1 of the WLWP which deals specifically with Construction, Demolition and Excavation (C, D&E) Waste. This clarifies why this waste stream is not included in the London Plan apportionment target – on the basis that the Plan area has substantial quantity of processing capacity for this waste stream and that the London Plan city-wide target of 95% recycling and reuse by 2020 are close to being met. However, and critically, the text goes on to confirm that: *the evidence also indicates that it is not possible for the more specific target of 80% of that recycling to be met in the form of aggregates by 2020 due to the lack of suitable waste.* The text adds that: *in particular policy encouragement is given to the development of capacity for the production of material suitable of use as substitutes for virgin materials, such as recycled aggregates.*

- 4.35 **Policy WLWP 2, Safeguarding and Protection of Existing and Allocated Waste Sites**, confirms that new sites with potential for development for waste management facilities (Table 5-2) will be safeguarded. The application site is identified in Table 5-2. It forms part of a larger 3.2 hectare “Western International Market Site” allocated in the Plan as a site to accommodate additional waste management uses. The application site covers less than half of the allocated area (1.5 hectares), the remaining 1.7 hectares have been built out and comprise the Hounslow Household Waste Facility. As per the provisions of Policy WLWP 1 it is ‘apportioned waste’ which is directed to the Western International Market Site.
- 4.36 The text of Policy WLWP2 deals in the first instance in terms of what is required on existing and safeguarded sites for development of new waste management facilities. The second part of the policy deals with development for “non-waste” uses and the requirement for provision of compensatory provision. The policy is however silent in terms of dealing with proposals for a “non-apportioned waste use” proposed on a temporary basis on a “safeguarded apportioned waste site”, which is somewhat distinct from a non-waste use.
- 4.37 Critically recent discussions between the WLWA and LBH have indicated that the situation remains that there is no indication of any immediate plans for the site, and that there is adequate capacity on existing sites for municipal and commercial waste processing in the short term. Therefore, an opportunity exists in this instance to utilise the spare capacity on the allocated site for an alternative short-term use – provided provisions are made to cease the use if the site is required for apportioned waste uses. This would ensure the on-going ‘safeguarding’ of the site for these uses.
- 4.38 **Policy WLWP4, Ensuring High Quality Development**, provides a detailed list of design and environmental considerations which all waste development proposals will be required to have addressed both at construction and operational phase, and to which due regard has been had.

d) **Hounslow Local Plan**

i) **Adopted Local Plan (September 2015)**

- 4.39 The adopted Local Plan (2015) remains as per that in place when the original application was determined.
- 4.40 The Local Plan sets out the Council’s spatial vision for the development of the Borough over 15 years until 2030. This includes a range of policies which were, and continue to be, relevant to the consideration of the proposals including policies relating to: promoting employment growth and development, urban design and a range of sustainability and environmental considerations. In particular, the following policies are highlighted:
- 4.41 **Policy GB1, Green Belt and Metropolitan Open Land**, states that the Council will protect and enhance the MOL to maintain its openness, quality and permanence. The Policy sets out a range of criteria that proposals will be expected to meet. This includes maintaining the openness, setting and visual amenity where it is located near MOL, with particular attention given to the location, setting, design, materials, height and landscaping of the proposal. The siting and layout of the proposals have taken into

consideration the adjoining MOL and do not deviate from the principles established by the original grant of planning permission.

- 4.42 **Policy EQ7, Sustainable Waste Management**, states that the Council will work with the London Waste Authority boroughs to meet waste apportionment targets, whilst promoting the recycling and recovery of waste consistent with the waste hierarchy. Safeguarding of existing in borough facilities such as the Quattro C&D plant for recycling of waste are essential to meeting this policy objectives
- 4.43 **Policy EQ10, Minerals**, states that the Council will contribute to London's aggregate supply. Part (b) of the Policy seeks to safeguard sites with minerals reserves, including "Land to the rear of Western International Market" so that their potential contribution to the borough's aggregate supply is considered before development takes place that could prevent future extraction. Part (c) of the policy confirms that the Council will promote the recycling of construction, demolition and excavation waste consistent with the West London Waste Plan.
- 4.44 A range of other relevant policies have of course also been considered in putting together the associated updated technical assessments which accompany the revised application. These include:
- Transport Assessment
 - Air Quality Assessment
 - Noise Assessment
 - Sustainability Statement

ii) Local Plan Review

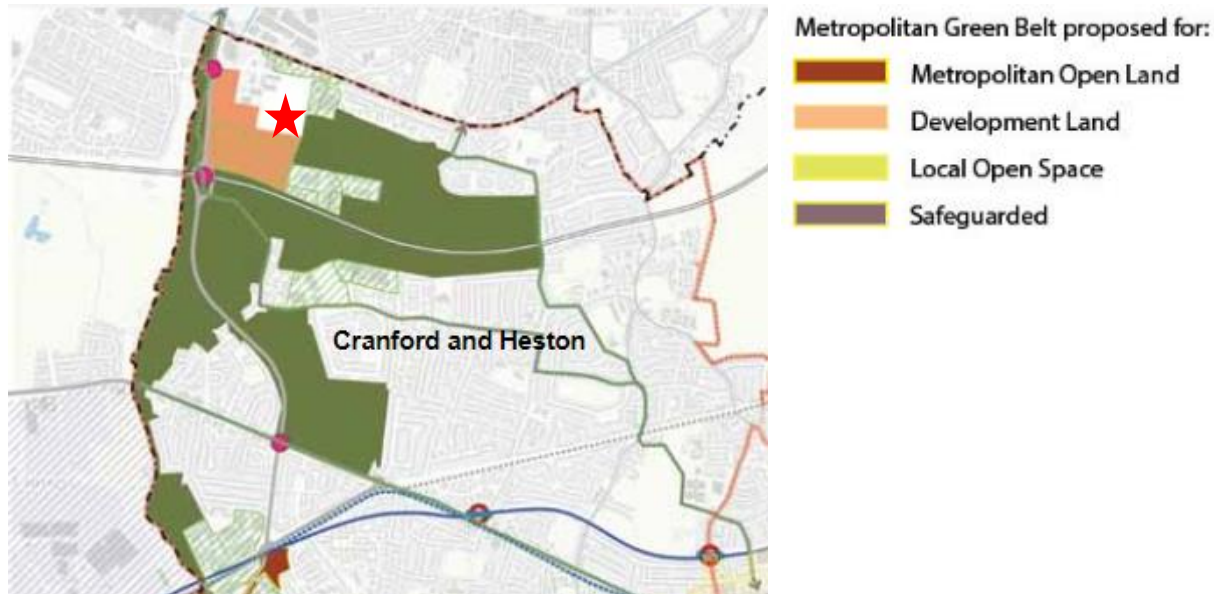
- 4.45 London Borough of Hounslow has prepared two new Local Plan Reviews since the original application proposals were considered. The reviews set out a for two areas: The Great West Corridor (GWC) and West of Borough (WOB). The second of which includes the application site. These documents were subject to a Pre- Submission Regulation 19 Consultation undertaken between July and September 2019. The consultation was accompanied by a Site Allocations document which derives from the GWC and WOB Local Plan documents
- 4.46 The Local Plan review was expected to be submitted to the Secretary of State in Summer 2020 (although this may well now be delayed due to the impact of Covid-19 Coronavirus). Upon adoption these documents will sit alongside the 2015 adopted Local Plan – but will supersede parts of the Plan.
- 4.47 Key emerging policies and any areas of proposed change in policy position and allocations as contained within the 'West of Borough Local Plan Review' have been considered.

West of Borough Local Plan Review, Pre-Submission Regulation 19 Consultation (July 2019)

- 4.48 Figure 4.1. 'Overall Spatial Strategy' of the draft West of Borough Local Plan identifies land south and west of the Western International Market, including land directly south of the Quattro application site

as Metropolitan Green Belt proposed for: 'Development Land'. An extract of Figure 4.1 with accompanying key has been provided for ease of reference.

Figure 2: Extract from Figure 4.1, Overall Spatial Strategy, WOB Local Plan Review July 2019 (Quattro application site indicatively marked with a red star)



- 4.49 In the context of employment growth, the Draft WOB Local Plan confirms that the Employment Land Review has found that in order to provide for increasing demand for industrial uses, more land is needed above and beyond the existing sites. Para 4.6 confirms that if additional land is not allocated for industrial uses the borough will not be able to accommodate growth in demand for such uses and could therefore lose out on jobs as businesses locate (or relocate) elsewhere in the functional economic market. On this basis the Council is therefore proposing the release of a small number of green belt sites that will provide additional floorspace to help 'close the gap' between demand and supply of employment land. In this context making best use of an existing industrial site, whilst it is not needed for its safeguarded apportioned waste use, is wholly justified where there is a scarcity in supply. The alternative being that the site is likely to lie empty whilst local business needs for industrial floorspace are not met with economic and employment implications.
- 4.50 Figure 5.12, Spatial Strategy for Cranford and Heston, identifies the Western International Market and the Metropolitan Green Belt land to the south as proposed for 'Industrial Use'. An extract of from Figure 5.12 is provided for ease of reference.

Figure 3: Extract from Figure 5.12, *Spatial Strategy for Cranford and Heston, WOB Local Plan Review July 2019* (Quattro application site indicatively marked with a red star)



- 4.51 **Cranford and Heston Neighbourhoods Place Policy: P5** seeks to deliver the place vision by amongst other things: Delivering 42,000 sqm of industrial floorspace (760 FTE jobs) and establishing a consolidated employment cluster in the core area next to the A312 (Parkway) and M4 corridor at existing trading estates, industrial parks and distribution centres.

Site Allocations Local Plan Review, Pre-Submission – Regulation 19 Consultation (July 2019)

- 4.52 Land to the south of the Quattro application site is identified in the Site Allocations document as: **Site Ref: 77 Land South of Western International Market**. The development details are confirmed as follows:

Key Proposal: Land South West of Western International Market will be utilised for mineral extraction, with redevelopment to industrial uses in the long term.

Land Uses: Minerals Extraction

Movement and Access: Access to the site should be facilitated utilising the existing access road adjacent to the north of the site and should provide appropriate improvements and mitigation to ensure the development does not increase congestion on Southall Lane and provides a safe walking and cycling access to the site. Development should have regards to proposals for the adjacent waste site when considering movement across the site.

Site Requirements: Site to be used for mineral (aggregate) extraction. Extraction should provide appropriate safeguards and mitigation to protect adjacent uses.

- 4.53 The Local Plan review is clearly at an early stage. However, the de-designation of Metropolitan Green Belt Land and the provision of new employment allocations to enhance the area's provision does offer

scope for a potential longer term solution to accommodate Quattro's temporary facilities on land to be designated for industrial purposes. Time is required of course for the Local Plan process to run its course. The temporary period applied for allows scope for the Local Plan process to be completed, and if the proposed allocations are retained in any adopted plan, for appropriate applications to be subsequently made.

e) Overview

- 4.54 The key changes in terms of policy documents since the approval of the original application proposals in 2018 comprise: the publication of the revised NPPF 2019, the progression of the Draft London Plan (which is at an advanced stage but not yet adopted) and the progression of the Hounslow Local Plan Review, which is still at a relatively early stage.
- 4.55 Notwithstanding the above, the key policy context is not considered to have altered materially since the original application proposals were approved. The thrust and requirements of the relevant documents (including that of the NPPF 2019 and Draft London Plan) do not raise any new issue not previously considered.
- 4.56 The key policy issues raised by the proposals are considered in the following section and principally relate to the acceptability in principle of the proposals in the context of the West London Waste Plan and the safeguarding of the site within that document for apportioned waste uses. In addition to relevant environmental and amenity policy considerations as required by a range of policy documents both adopted and emerging and in the context of what was previously found to be acceptable and approved.
- 4.57 However, the emerging Local Plan position is relevant to highlight again. Whilst this document is at an early stage if progressed and adopted in the form currently envisaged it does open up the potential that the temporary uses applied for could in the future be retained on a permanent basis. This could either be via relocation to land to the south post extraction of minerals and as part of the proposed longer-term use for industrial purposes. Or indeed for retention on-site with a compensatory apportioned waste use area provided for on the land to the south. These matters are of course complex and will take time to resolve – and cannot be relied upon until such time as the Local Plan review process is nearing completion. Accordingly, the application proposals do of course fall to be assessed under the current Local Plan provisions. However, it is relevant that the further temporary period of operation sought does allow time for the Local Plan review to be completed and potentially assists with securing a permanent long term solution to accommodate and safeguard both the waste recycling facility and the concrete batching plant facility and the associated jobs.

SECTION 5: RELEVANT PLANNING CONSIDERATIONS

- 5.1 The application proposals follow the grant of planning permission ref 01032/E/P44 in January 2018 and critically are for the same uses and operations previously found acceptable and approved. The only differences these proposals give rise to are:
- i) Reduced red-line and developable site area which has resulted in alterations to site layout/configuration of structures, provision of a small number of new structures and additional site enclosure.
 - ii) An additional period of time is sought for the temporary retention of the structures/uses on site. As compared to the 2018 permission which requires use to cease by 18 January 2021, this application seeks permission for retention of structures/uses until 31 December 2027.
- 5.2 The application proposals are assessed below in the context of the above two factors and against the same range of considerations as the 2018 permitted scheme was subject to. Regard has also been had where relevant to any material change of circumstances since the proposals were originally considered. In this context it is highlighted that the Policy Review at Section 4 has identified that whilst the policy position has moved forward (e.g. NPPF updated in 2019 and Draft London Plan has reached advanced stage) – there has been no material change in the policy context against which the proposals should be considered. Albeit, the review of the Local Plan indicates a changing policy context for the site and surrounding area which lends further support to a further temporary period to be allowed while that process continues and potentially offers a longer term solution. Given the early stage of the Local Plan limited weight can be placed on it at this stage.
- 5.3 The description of the Site and Surrounding Area at Section 2(a) has identified that the Household Recycling Centre has now been built out on the western boundary of the application site. No other new development has been identified as coming forward in the surrounding area (particularly noise sensitive uses) which would alter the context of the site from that when the original permission was granted. However, any new development coming forward in the vicinity of this now established site should have regard to the Agent of Change Principle. Whilst the use approved was for a temporary period it is reflective of the kind of activity (including noise) that would be expected on a site specifically safeguarded for apportioned waste uses.
- a) Principle of the development**
- 5.4 The application site, as identified in the planning policy section is allocated in the West London Waste Plan for future waste facilities, and Policy WLWP2 seeks to safeguard such sites.
- 5.5 The plan identifies and seeks to address a significant shortfall in facilities for Municipal Solid Waste and Commercial Industrial Waste, and indeed the site is allocated specifically for this type of apportioned waste use. The applicant, and LBH in determining the original application, were clear that the facility and associated uses on a site allocated and safeguarded to process household and commercial waste

would conflict in principle with the objectives of Policy WLWP1 of the West London Waste Plan. This remains the case for the revised proposals. However, as was the case previously there a number of specific and over-riding material considerations which support the retention of the use on site for a temporary period.

- 5.6 The original consent was for a period of 3 years which ends on 18 January 2021. This temporary period of consent was considered acceptable when the original application was approved despite the site being subject to the wider allocation in the West London Waste Plan for apportioned uses. This was on the basis that it was confirmed that there were no imminent plans for an apportioned waste use for the application site and that there was an adequate capacity on existing sites for municipal and commercial waste processing in the short term.
- 5.7 Recent engagement with the WLWA by LBH has indicated that this position has not changed. On this basis the Waste Authority have agreed that LBH can extend Quattro's lease to 21 December 2027 subject to a 12 month break clause should the site be required for apportioned waste uses.
- 5.8 As such the application, for a further temporary period to run to 21 December 2027, would not compromise municipal and commercial waste management objectives for the duration of the additional period of operation. The site remains a site safeguarded for apportioned waste uses and will be available for those purposes at the end of the proposed additional period of operation. Should it be considered necessary the 12 month break clause in the lease could be reflected in a S.106 Agreement.
- 5.9 As was previously the case, the proposals whilst not for an apportioned waste use are nonetheless in part for a waste use. If the site, as indicated by the WLWA, continues to not be needed in the short term for apportioned waste uses then an alternative non-apportioned waste use retained for a further temporary period should be viewed in planning terms as an appropriate use and crucially as the next most preferable use. Further, it is relevant that the evidence base and draft Local Plan Review confirm a shortage of industrial land within this part of the borough. Making use of this site for a temporary period for industrial uses, and whilst not required for its safeguarded use, is considered to make best use of previously developed, brownfield site – which are in short supply for this type of use.
- 5.10 In terms of provision of a C&D waste facility specifically, whilst the WLWP does highlight that the area has substantial quantity of processing capacity in this waste stream and that London Plan city wide target of recycling and reuse are close to being met, the proposal is as a result of a relocation within Borough of an existing facility. It was not for new or additional provision. Moreover, the WLWP is clear in highlighting problems with meeting the specific target of recycling to be met in the form of aggregates by 2020. In this context it is relevant that the non-apportioned waste use proposed to be continued at Southall Lane is one for which the WLWP offers particular support – namely production of material suitable for use as substitutes for virgin materials such as recycled aggregates. Indeed, the facility is able to produce a proportion of high grade recycled material which is fed directly to the co-located CBP in replacement of land won aggregate.
- 5.11 Material to the consideration and support of the original application submission was that the proposal allowed for the relocation of a construction waste recycling facility and a concrete batching facility and retention of jobs which were threatened by CPO of existing Quattro facilities at both Lionel Road and

Park Royal. Those facilities have now been lost and an alternative relocation site has still not been formally secured. However, proposals for what will be a new permanent site for the concrete batching facility are at advanced planning application stage having secured a recommendation for approval by planning committee subject to completion of a S.106 agreement. If that application is approved, and once built out it is expected that that that will reduce activity associated with the Southall CBP by about 25%. However, an alternative location for the waste recycling facility has yet to be identified.

- 5.12 The ability to retain the current operations on site at Southall for a further temporary period are critical to safeguarding an established business and a significant number of associated jobs and enable further time to secure a permanent relocation site for all on-site operations. It remains the case that the structures erected can be dismantled within a short time frame. As was previously proposed, the site will be left cleared, laid to hardstanding, appropriately linked to services and ready for occupation by any subsequent conforming apportioned waste use. This is an improvement in terms of the physical state of the site prior to Quattro taking control, and the works completed to date particularly with regard to boundary treatment, pedestrian access and linkage to services have significantly improved the site and its future prospects. This further underpins the fact that the proposals will not compromise the aims and objectives of the West London Waste Plan in the longer term.
- 5.13 In keeping with the conclusions reached in the consideration of the original application, whilst it is acknowledged that the site is allocated for the processing of other forms of waste it is considered that the current proposal would no compromise the long-term aims and objectives of the West London Waste Plan. There are no immediate plans or need for the site and there are clear wider benefits. The scheme which would allow continued accommodation of an existing facility (relocated from within borough du to CPO threat) and which serves to meet existing construction waste recycling requirements contained within the West London Waste Plan. The proposals would ensure the continued safeguarding of associated jobs and an established business.
- 5.14 These are therefore considered to be material considerations that justify the departure, as they did when the original application was considered, coupled with the fact that the proposal would operate in a similar manner to a safeguarded waste use, and would serve to sustain construction waste facilities in the Borough.
- 5.15 It also remains the case that the development supports and captures the benefits of waste recycling and has inherent sustainability benefits by allowing co-location with a concrete batching plant which again should underpin the acceptability of the application for a further temporary period.
- 5.16 For all of these reasons the application proposals for the additional temporary period to 21 December 2027 should be considered as acceptable in principle.

b) Other Relevant Considerations

- 5.17 Notwithstanding the conclusions reached in terms of the acceptability in principle of the proposed additional temporary period of operation of the application site, there is of course a need to have regard to a range of other relevant considerations. These primarily relate to the design/layout changes inherent in this revised application and as have been largely built out on site. This is both in terms of

the character and design of the revised proposals and any potential environmental impacts and amenity considerations arising from those changes or indeed for the extended period of operation.

- 5.18 In this respect, all relevant supporting technical assessments which were previously commissioned to assess the proposals have been reviewed to ensure they take into account changes to the layout and operation (provision of additional mitigation) of the site and where relevant having regard to any changes in policy, guidance or regulations. In addition, where information was previously required for discharge of condition on the original permission this has been referenced and provided within the relevant technical assessments or accompanying application drawings – to enable as full a consideration of this revised application as possible.

i) Design and Visual Appearance

- 5.19 The amendments to the site layout and structures from those previously approved have been largely driven by the fact that less developable area was available at build out stage than was anticipated when the scheme was approved. Specifically, a 3m strip was lost along the western boundary. In addition, a decision was made to pull the main built structures away from the bunded, vegetated area along the eastern boundary to retain more of the natural screening and provide better separation – which resulted in the loss of a 10 m strip of land on this boundary. The amendments to the scheme are detailed further in the description of development within this statement and in the Design and Access Statement.
- 5.20 Following discussions with LBH Officers as well as for operational reasons – the scheme as built out has been further reviewed and additional works are in the process of being carried out to further enclose and clad elements of the waste recycling operations and provide further site enclosure/boundary treatment and relocate the office/welfare facilities. As already detailed, the plans submitted show all works proposed and the application should be considered on that basis. Restricted working as a result of the impact of the Coronavirus has meant that some elements of the works have not yet been completed – but they will be progressed as soon as practicable.
- 5.21 The implications of the amended scheme have been reviewed in terms of environmental considerations below and within the accompanying technical assessments/reports. In the specific context of the design and visual appearance of the development this is considered overall to be very much in keeping with the design principles proposed by the original application and found acceptable by LBH. Scale, height, massing and external detailing remain largely consistent with the approved scheme.
- 5.22 The proposals are of an industrial appearance given the nature and operations. All of the main elements and activities, including the conveyors are enclosed. The proposals have an aesthetic simplicity, are uniform in appearance, and are unobtrusive in colour. Materials and colour as previously agreed by discharge of condition have been adhered to across the scheme.
- 5.23 In keeping with the adjoining and now built out Hounslow Household Waste Facility, and surrounding existing warehouse style development, the plant is clad in steel plastisol profile metal cladding to facilitate the operations to be undertaken. The cement silos, water storage tanks and aggregate storage

bin constructed and finished in steel. The colour of the plant and associated structures is Goosewing Grey.

- 5.24 Whilst the proposal is for the erection of “plant” rather than “buildings”, and notwithstanding that the proposal is for a temporary period, effort has been taken to minimise the scale of the plant, locate it discreetly and ensure that it provides for a simple aesthetic form of neat and tidy appearance.
- 5.25 Whilst the site layout has been marginally altered, the key principles of the layout remain the same. The two plant facilities remain located adjacent to the warehouse style buildings to the north of the site. These larger scaled elements of the proposals have been specifically kept away from the southern boundary to minimise impact on the Metropolitan Green Belt land to the south.
- 5.26 By drawing the development away from the eastern boundary of the site to allow full retention of the bundled/treed and vegetated area together with additional boundary treatment along the eastern fence line – the revised proposals improve on the original scheme in terms of filtering, screening and minimising views into the operational part of the site. Similarly, the relocation of the aggregate storage bays and the additional concrete wall both running east-west roughly across the centre of the site, again restricts and screens views of the plant and operational areas beyond. Thereby improving the relationship with the Metropolitan Green Belt land to the south. Additional recycled material storage bays have been proposed to the south of the main enclosed recycling operation and on the eastern boundary of the site. Those on the eastern boundary of the site serve to provide greater screening and enclosure of activities. These additional elements are very much in keeping with the scale and form of the development as originally approved.
- 5.27 Parking and office facilities are located to the southern half of the site as was previously proposed. The only key difference on the southern half of the site is that the weighbridge office has been placed on stilts – but this is considered to remain a relatively small and discreet built form and will be viewed in the context of the more substantial plant structures further to the north, and is itself centrally located within the site. The welfare/office facility to the south of the site as was previously the case comprises a double height facility – but the length and width has increased. Again, this is not considered to be a material change to the development as previously approved and this structure was not considered to severely compromise the character of the area when previously considered. A small single level security cabin is also proposed on the southern boundary. Given its scale, size and location this similarly does not raise any design or visual impact considerations.
- 5.28 It is considered that the right balance has been struck between the functional and operational requirements of the proposal, and the need to have regard to the immediate context of the development site and having regard to the scheme as originally considered acceptable and approved.
- 5.29 It is relevant to note that the site is specifically safeguarded for apportioned waste uses. Inherent in that allocation is the expectation that the form of development which would come forward would be industrial in form, scale and appearance. Indeed, it would likely share many of the characteristics of the application proposal.

5.30 Given the site allocation, nature of the scheme, temporary period of permission sought, proposed use and the context of neighbouring developments the amended proposal is considered to be acceptable in design and visual appearance terms.

5.31 It is again noted that details previously subject to discharge by condition (materials, fencing/boundary treatment design etc..) have been provided as part of the application submission. This has ensured a full and comprehensive application submission package.

ii) Highways Considerations (Traffic, Parking and Access)

5.32 For the previously approved scheme, a Transport Assessment was produced to accompany the application submission and to consider the potential impacts of the proposed development on the local highway network, taking into consideration accessibility, safety and junction capacity. TfL, Highways England and LBH were all consulted in terms of agreeing the methodology for assessment. The original Transport Assessment supported the conclusions that it was not considered that significant transport effects would arise from the proposed development.

5.33 By way of discharge of conditions for the original scheme details were submitted in respect of the following:

- Condition 8: *Car park management plan, Servicing Management Plan, Vehicle Routing Plan, Plan/details showing the spread of vehicle movements from the site demonstrating that the site operates in a manner to minimise impact on the surrounding highway network; wheel wash details.*
- Condition 10: *car, cycle, pedestrian and disabled access arrangements.*

5.34 i-Transport who undertook the original work have been instructed to update (including by way of new survey work) the assessment previously undertaken and update the information previously provided to discharge highway/access related conditions. Accordingly, this application is supported by an updated transport assessment, car park management plan and servicing management plan.

5.35 On review of the updated assessment and details it is clear that the development proposal as per the original proposal is acceptable in transport and highways terms, can be accommodated within the existing highway infrastructure and the cumulative impact would be considered not severe.

5.36 It is further confirmed that Quattro as part of the original grant of planning permission and in accordance with the requirements of the associated S106 Agreements, have already made a contribution of £5,390 to be used towards a signal timing review of the Bulls Bridge roundabout.

5.37 In the context of highways considerations, it is relevant to note that Quattro has secured an option to work sand and gravel from the adjacent site to the south of the application site within the MOL, owned by LBH and comprising a 'Safeguarded Minerals Site'. A separate application is being prepared by Quattro to work that area of land. If that development proposal were to be approved the intention would be that the mineral extracted would be directly fed to the adjoining concrete batching plant (as well as being sold direct to the wider construction market). The ability to be able to directly feed the

CBP would give rise to significant HGV road mile and emissions savings by not having to import mineral by road to the plant. As that application has not yet been submitted, this application for retention of the CBP for the additional temporary period sought has been assessed on the basis of it being a fully road served facility. However, in the future there are prospects the plant could be more sustainably fed by virtue of being located adjacent to a mineral extraction site.

iii) Noise

- 5.38 A Noise Assessment was undertaken in respect of the original application to meet policy requirements and demonstrate that sensitive receptors would not be exposed to unacceptable levels of noise. The original application proposals were amended to be more enclosed and secure enhanced boundary treatment. The revised scheme fully accords with the physical and operational measures previously proposed to ensure the proposals do not give rise for the potential to exceed acceptable levels. It is noted that this revised application proposes additional/enhanced boundary treatment measures over and above that previously approved.
- 5.39 The original permission required by Condition 9 the submission of a Site Noise Report – detailing noise resulting from the operation of the facilities and proposed mitigation measures.
- 5.40 The Acoustic Report submitted with this application considers the amended proposals and also reflects the requirements of Condition 9. The Report is clear in its conclusions that it is considered that an acceptable noise environment would be achieved within the proposed development and that noise effects at surrounding receptors would not be significant.

iv) Air Quality / Dust Management and Monitoring Plan

- 5.41 Updated Air Quality Assessment and Dust Management and Monitoring Plan documents have been prepared following that submitted and approved in relation to the previous permission and to again demonstrate compliance with planning policy requirements.
- 5.42 The updated Air Quality Assessment (June 2020), as prepared by Ramboll, identifies that in comparison with the previous permission, the operations being undertaken at the site are the same and that the design / site structures are broadly similar. Notably there are some alterations which improve dust mitigation such as full enclosure along with eastern boundary with Southall Lane with integrated dust mitigation. The AQA concludes that the proposals do not result in any further impact in air quality terms over and above the consented scheme.
- 5.43 The majority of operations would continue to be carried out within enclosed or screened areas or would be damped down to prevent wind-whipping as fully set out within the submitted Dust Management Plan. Operational dust emissions from the proposed development are therefore unlikely to be significant and appropriately mitigated / managed and monitored. Furthermore, given the separation distances between source and receptor the impact of residual emissions is highly unlikely to result in a significant effect at the nearest sensitive receptors.

- 5.44 It is further noted that the site is operated under an Environmental Permit for the handling and processing of wastes. The site is operated under a Part B Permit for the CBP issued by LBH (Reference EPR147, issued 28/02/2018).
- 5.45 In terms of the impact of traffic emissions from the proposed development, the change in traffic movements recorded on site in comparison to those predicted for the original application are considered to be very minor and as such, the findings of the previously approved air quality assessment, that the impacts were not significant and slightly adverse at worst case, remain entirely valid.
- 5.46 Accordingly, it is concluded that through the provision of designed in mitigation measures together with management procedures outlined within the Dust Management and Monitoring Plan, provided in response to Condition 18 as imposed on the original planning permission, that the proposed development can be operated without causing significant amenity effects at the nearest sensitive receptors.

v) Residential Amenity – Noise, Disturbance and Air Quality

- 5.47 The nearest residential properties to the proposal are some 250 m from the nearest site boundary and as was previously concluded the proposals do not have the potential to raise concerns in terms of potential impact from light, outlook or privacy. This site context has not changed since the consideration and approval of the original application proposal.
- 5.48 Notwithstanding, it is confirmed in the context of noise, disturbance and air quality considerations that the plant is fully enclosed in steel profile clad structures which provide noise attenuation and prevent dust emission. A range of noise and dust control measures either integrated into the design or via operational mechanisms are provided. These accord with or improve on the proposals as previously approved.
- 5.49 The conclusions of the Air Quality Assessment and Noise Assessment with regard to residential receptors has been summarised above and are detailed in full in the accompanying submission documents. The same conclusions are drawn as per the original application that the proposals do not give rise to any potential for impact in this respect.
- 5.50 During the consideration of the original application suggestions were made to ensure vehicles were routed in a manner that minimises impact on local residents. Information on vehicle routing as previously submitted to discharge Condition 9 and prioritising main roads rather than quieter residential streets where practicable have been re-provided as part of this application submission.

vi) Additional ‘Sensitive Receptors’ – Noise, Disturbance and Air Quality

- 5.51 During the consideration of the original application specific regard was had to Costco, located to the north of the application site, and the Virtus Data Centre located to the north west of the application site. Members suggested these properties should be treated as sensitive receptors for the purposes of completing Air Quality and Noise Reports. To address these requirements amendments were made to the scheme during the progression of the original application proposals. The scheme as now largely

built out and as proposed by this retrospective application reflects and adds to the principles established by the original application scheme.

- 5.52 As detailed in the application drawings, the bulk of the facilities are enclosed with openings where there is an operational necessity within steel enclosures. Details of dust suppression have been replicated and are detailed on the application drawings, all material stock bays are to be enclosed on three sides with a roof. Boundary treatment is already in place along the boundary with the adjoining waste facility to the west and to the north with Costco. Further boundary treatment is also provided for along the eastern boundary of the site with some remaining to be built out.
- 5.53 An updated dust management and dust monitoring plan has been provided with this application and reflects that previously submitted to discharge Condition 18 of the original permission. The new Air Quality Assessment submitted with this application has reviewed the amended scheme and similarly to the original scheme in terms of impact on neighbouring properties has determined that the proposals are acceptable in the context of both the Costco and Virtus operations.
- 5.54 The enclosure of the facilities and boundary treatment (which is more extensive than previously approved) serve to screen neighbouring businesses from noise. A new acoustic assessment has been provided which has concluded, similarly to the original scheme, that noise and vibration would not exceed acceptable levels.
- 5.55 As concluded by LBH in determining the original application this is considered the maximum that could be reasonably expected for a waste facility and takes all reasonable steps to ensure that there will not be air quality, noise or dust concerns arising from the proposed use.

vii) Operational Statement, Site Monitoring and Management

- 5.56 A number of conditions were attached to the original planning permission to ensure the scheme would not adversely impact on neighbouring uses.
- Condition 19: *Site details of measures to be adopted to control and monitor the presence of birds, vermin and other pests*
 - Condition 20: *Operational Statement*
 - Condition 21: *Scheme for monitoring and managing the facility*
- 5.57 Details in accordance with the above have been submitted with this application to ensure that all amenity considerations previously raised have been fully addressed.

viii) Flood Risk

- 5.58 The application site is located within Flood Zone 1. The development is classified in the NPPF as 'less vulnerable' which is appropriate in Flood Zone 1 and therefore the sequential test is deemed to be passed and the exception test is not required.
- 5.59 An updated flood risk assessment (FRA) has been provided as part of the application submission. This has confirmed that the site is of low risk to all sources of flooding. It is concluded, as was the case in the determining of the original application proposal, that Flood risk does not pose a constraint on the development and as detailed below an appropriate drainage strategy has been provided.

ix) Drainage

- 5.60 An outline drainage strategy was submitted as part of the original application proposals. This proposed capping (laying to hardstanding) the entire operational area of the site and the storage of surface water below ground on-site for reuse as part of the on-site activities. Attenuation would be sized to store the 1 in 100-year storm event, including allowance for climate change.
- 5.61 Condition 11 attached to the current permission for the site required submission of plans and details of the drainage arrangements. Details have been previously submitted to discharge this condition. These have been amended and updated to reflect the proposals as built out and provided as part of the application submission. They comprise a written statement by Marks Heely, 'Surface Water Drainage Strategy (April 2020) and Drawing Ref: H11930-01 Rev F.

x) Sustainability and Energy

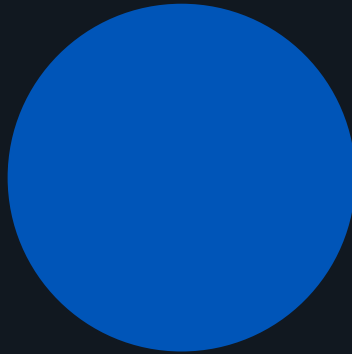
- 5.62 Condition 17 attached to the current permission requires submission of details to demonstrate the modular offices will achieve minimum energy requirements and the facility meets best practice for sourcing sustainable materials. Details were previously submitted to discharge this condition. These have been updated to reflect the amended proposals and are provided within the 'Sustainability and Energy Statement' prepared by Envision.
- 5.63 This demonstrates that the proposal meets sustainability objectives both intrinsically through the waste recycling operation and co-location of facilities, and also through incorporation of a number of practical measures such as environmental / pollution controls, use of recycled material to feed the batching process, water recycling, sustainable travel initiatives including provision of cycle parking, improved pedestrian access and ongoing utilisation of staff travel planning, and utilisation of recovered, refurbished units for office buildings which are building regulations Part L compliant.
- 5.64 More generally it is confirmed that the development performs well against relevant local and regional sustainability policy and has delivered a sustainably built development which maximises the productive use of a brownfield site and ensures continued operation and employment within the Borough. As such the proposed development is contributing positively to the sustainability agenda.

- 5.65 In the context of sustainability considerations it is important to reiterate the inherent sustainability of co-locating a waste recycling facility which can produce recycled material of a high enough grade to be used in the adjoining CBP and the reduction of associated HGV road miles in this respect.
- 5.66 The production and use of recycled material in lieu of virgin material is also of course a highly sustainable form of development – assisting with the safeguarding of natural resources. Indeed, in more general terms a waste recycling facility which seeks to move waste up the waste hierarchy is again a clear sustainable form of development.

SECTION 6: SUMMARY AND CONCLUSIONS

- 6.1 The application proposals follow the grant of planning permission ref 01032/E/P44 in January 2018 and critically are for the same uses and operations previously found acceptable and approved. The only differences these proposals give rise to are:
- i) Reduced red-line and developable site area which has resulted in alterations to site layout/configuration of structures, provision of a small number of new structures and additional site enclosure.
 - ii) An additional period of time is sought for the temporary retention of the structures/uses on site. As compared to the 2018 permission which requires use to cease by 18 January 2021, this application seeks permission for retention of structures/uses until 31 December 2027.
- 6.2 The application proposals have been assessed in the context of the above two factors and against the same range of considerations as the 2018 permitted scheme was subject to. Regard has also been had where relevant to any material change of circumstances since the proposals were originally considered.
- 6.3 Approval of the original application and discussion between LBH and the WLWA ahead of this submission have confirmed the acceptability in principle of the proposals. This is on the basis that there is an on-going need for the proposals and, critically, that they will not compromise the aims and objectives of the West London Waste Plan as the site is not currently required for apportioned waste uses, will remain safeguarded for those purposes and the proposal is for a limited period with the ability for the use to cease earlier than the proposed end date if required.
- 6.4 The ability to retain the current operations on site at Southall for a further temporary period are critical to safeguarding an established business and a significant number of associated jobs and enable further time to secure a permanent relocation site for all on-site operations. It remains the case that the structures erected can be dismantled within a short time frame. The site will be left cleared, laid to hardstanding, appropriately linked to services and ready for occupation by any subsequent conforming apportioned waste use. This is an improvement in terms of the physical state of the site prior to Quattro taking control, and the works completed to date particularly with regard to boundary treatment, pedestrian access and linkage to services have significantly improved the site and its future prospects. This further underpins the fact that the proposals will not compromise the aims and objectives of the West London Waste Plan in the longer term.
- 6.5 Notwithstanding the conclusions reached in terms of the acceptability in principle of the proposed additional temporary period of operation of the application site, there is of course a need to have regard to a range of other relevant considerations. These primarily relate to the design/layout changes inherent in this revised application and as have been largely built out on site. This is both in terms of the character and design of the revised proposals and any potential environmental impacts and amenity considerations arising from those changes or indeed for the extended period of operation.

- 6.6 In this respect, all relevant supporting technical assessments which were previously commissioned to assess the proposals have been undertaken again taking into account changes to the layout and operation (provision of additional mitigation) of the site and where relevant having regard to any changes in policy, guidance or regulations. In addition, where information was previously required for discharge of condition on the original permission this has been referenced and provided within the relevant technical assessments or accompanying application drawings – to enable as full a consideration of this revised application as possible.
- 6.7 In environmental terms all possible measures have been taken to ensure that the plant and associated structures are constructed, clad, laid out and operate in a way that ensures there will be no significant adverse effects. Indeed, additional site boundary treatment is proposed above that previously approved. The accompanying technical assessments conclude that there will be no significant adverse effects and have had regard to the mitigation measures as appropriate to ensure this.
- 6.8 In the context of the design and visual appearance of the development as revised this is considered overall to be very much in keeping with the design principles proposed by the original application and found acceptable by LBH. Scale, height, massing, siting (relative to surrounding land uses) and external detailing remain largely consistent with the approved scheme. The DAS has appropriately and proportionately considered design and visual matters given the nature of the proposals and indeed that there is no requirements to assess waste proposals in this way, the CBP only triggering the need for a DAS.
- 6.9 In light of the planning history of the site, relevant policy context (which has not changed materially since the grant of the original permission), the specific site context which has not materially changed, the form of development proposed (as compared to that previously approved) and the conclusions of technical assessments provided for this revised proposal, it is considered that there should be a clear presumption in favour of planning permission being granted in this instance.



Firstplan Ltd
Bramah House
65-71 Bermondsey Street
London SE1 3XF

T: 020 3096 7000
www.firstplan.co.uk

COPYRIGHT
The contents of this document must not be copied or reproduced in whole or in part without the written consent of Firstplan Ltd