

# Planning Statement

***Addition of an ancillary workshop and associated infrastructure for the maintenance of waste collection vehicles***

***Land to the south of SUEZ Waste Transfer Station, Rigby Lane, Hayes***

October 2025



**Project quality assurance information sheet**

**LAND TO THE SOUTH OF SUEZ WTS, RIGBY LANE, HAYES, GREATER LONDON, UB3 1ET**

Report status	<b>FINAL</b>
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**Additional Documents**

CIL Form 1

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# 1. INTRODUCTION

- 1.1. This statement supports a full planning application made by SUEZ Recycling and Recovery UK Ltd (SUEZ) for the proposed addition of a workshop and associated infrastructure for the maintenance of waste collection vehicles. The workshop is proposed to be located on land to the south of the operational Waste Transfer Station (WTS) Rigby Lane, Hayes, Greater London UB3 1ET.
- 1.2. The site has been in operational waste use for many decades. Planning permission was issued for the reconfiguration of the site in 2007 (permission reference 643/APP/2002/1592) with the site redeveloped in 2010.
- 1.3. Permission 643/APP/2002/1592 included the development of a vehicle workshop that has not been constructed. SUEZ is now seeking permission to build a workshop with similar dimensions to the workshop approved under permission 643/APP/2002/1592 but reorientated to be located along the site's eastern boundary.
- 1.4. The following provides a description of the site and its surroundings, a description of the development, an assessment of the development against national and local planning policy and an assessment of the key issues that need to be considered when determining the application.
- 1.5. It should be noted that this application does not include a design and access statement as the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Section 9 paragraph 1) details that the requirement for such *"applies to an application for planning permission which is for— (a) development which is major development; or (b) where any part of the development is in **a designated area**, development consisting of—(i) the provision of one or more dwellinghouses; or (ii) the provision of a building or buildings where the floor space created by the development is 100 square metres or more"*. Paragraph 5 states *"In paragraph (1)—"designated area" means—(a) a conservation area; or (b) a property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention Concerning the Protection of the World Cultural and National Heritage (a World Heritage Site)"*
- 1.6. The proposed development is not major development and is not located within a conservation area or a property appearing on the World Heritage List and therefore a design and access statement is not provided with this application.
- 1.7. SUEZ has engaged in pre-application discussions with the London Borough of Hillingdon (LBH) planning team. The pre-app response from London Borough of Hillingdon is included at **Appendix A**.
- 1.8. The proposed development is not considered to be EIA development.

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## 2. THE APPLICANT

- 2.1. SUEZ Recycling and Recovery UK Limited (SUEZ) is a recycling and resource management company that has been managing the waste from households and businesses in the UK since 1988. With over 5,000 employees in the UK, SUEZ operates a network of facilities including: recycling, composting, refuse derived fuel production, solid recovered fuel production, wood processing, energy-from-waste and landfill.
- 2.2. SUEZ is committed to core values that guide its operations and business practices. These values include:
- **Sustainability:** SUEZ places a strong emphasis on sustainability, aiming to protect and preserve the environment by promoting recycling, resource recovery, and waste management practices that minimise environmental impact.
  - **Circular Economy:** SUEZ is dedicated to promoting the circular economy model, which focuses on reducing waste, maximising resource efficiency, and promoting the reuse and recycling of materials to create a closed-loop system.
  - **Innovation:** SUEZ values innovation and strives to develop and implement cutting-edge technologies and solutions to address complex waste management challenges, optimise resource recovery, and support sustainable development.
  - **Customer Focus:** SUEZ prioritises understanding and meeting the needs of its customers, working closely with them to deliver tailored and effective waste management and recycling solutions.
  - **Health and Safety:** SUEZ places the highest priority on the health and safety of its employees, customers, and the communities it serves. The company is committed to maintaining safe working conditions and adhering to rigorous safety standards.
  - **Social Responsibility:** SUEZ actively engages with local communities, promoting social responsibility initiatives and contributing to the well-being and development of the areas in which it operates.
- 2.3. These values drive SUEZ's missions to provide sustainable waste management solutions, promote resource recovery, and foster a circular economy.

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### 3. SITE DESCRIPTION

- 3.1. The proposed vehicle workshop would be located partially on an area of land within the Rigby Lane Hayes WTS 'red line' boundary and partially on land directly to the south of the WTS building. The site is located within an established industrial estate approximately 1.3 kilometres southwest of Hayes town centre and 1.3 kilometres north of the M4 Motorway in Greater London at National Grid Reference TQ 082 798.
- 3.2. The site is surrounded immediately to the north, east and west by commercial/industrial units. To the north of the site is the Grand Union Canal and to the south is the railway line leading from the Hayes and Harlington railway station. The closest residential properties are to the south of the site beyond the railway line approximately 110 metres from the site boundary. As shown on photograph 1 below, the elevated railway line running along the southern boundary effectively blocks line of sight from the south.



*Photograph 1 – view of the proposed location for the vehicle workshop with the railway line to the right*

- 3.3. The sites location within the wider area is shown on figure 1 below.

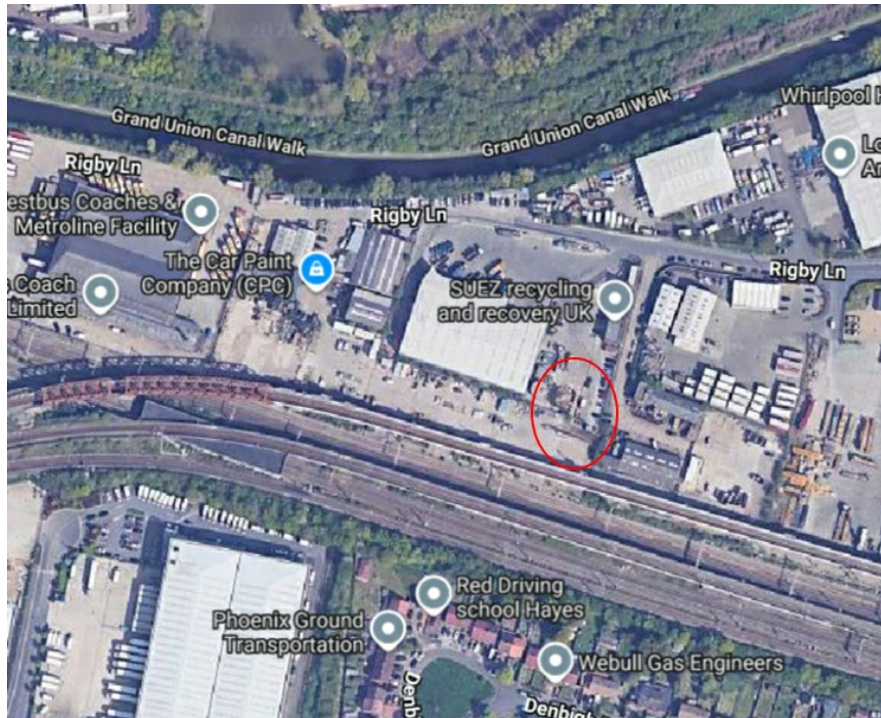


Figure 1 – Site Location (source: Google maps)

## Designations

- 3.4. The site is not located near any internationally or nationally designated sites. As shown on Figure 2 below, the closest SSSI and Ramsar site at Staines Moor SSSI, Wraysbury Reservoir SSSI and Southwest London Waterbodies (RAMSAR) are 6.6km to the south west of the site. The Yeading Meadows Local Nature Reserve is located 3km to the northeast. The closest listed building is Enterprise House a Grade II listed building 1.1 km to the east of the site. The proposed development would not impact upon any of the designated sites.

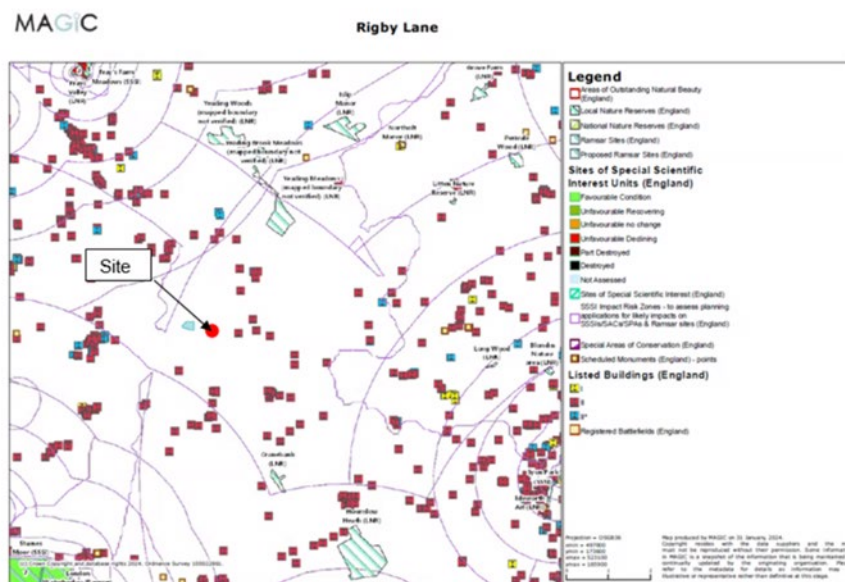
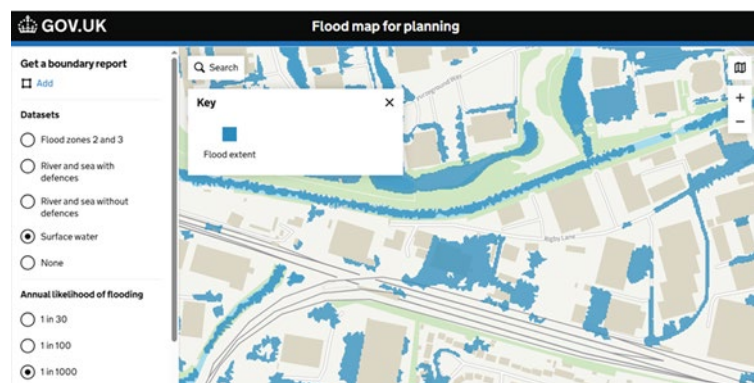


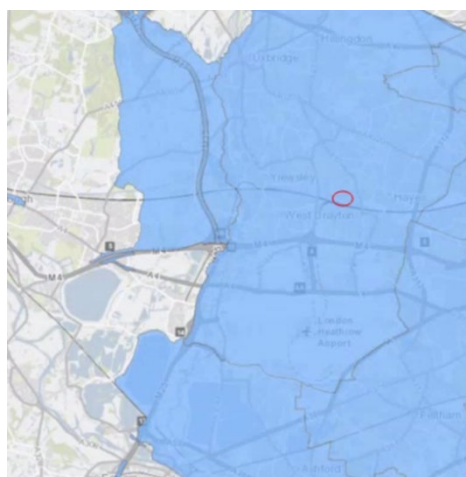
Figure 2 – Designation Areas (source: Magic Map)

- 3.5. As shown on figure 3 below, the site is located in flood zone 1 but does have a 1 in 30 year likelihood of surface water flooding for part of the area where the workshop is proposed. This is addressed within the enclosed Flood Risk Assessment.



*Figure 3 – EA Flood map for planning*

3.6. The Department of Environment, Food & Rural Affairs UK Air Information Resource Air Information Resource UK AIR AQMA Details identifies that the site falls within the Hillingdon AQMA, as shown on Figure 4 below.



*Figure 4 - Department of Environment, Food & Rural Affairs UK Air Information Resource AQMA interactive map*

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## 4. PLANNING HISTORY

- 4.1. The WTS, where the vehicle workshop will be accessed from, has operated as a waste facility for many decades. Planning permission was issued for the reconfiguration of the site in 2007 (permission reference 643/APP/2002/1592 provided as **Appendix B**).
- 4.2. In 2024 retrospective planning permission was issued for the partial rebuild of the WTS building which had been impacted by a fire and needed to be partially rebuilt (planning permission reference 643/APP/2024/1825).

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## 5. PROPOSED DEVELOPMENT

- 5.1. SUEZ proposes to construct a vehicle workshop building for the maintenance of waste collection vehicles. The building would accommodate a three bay workshop with storage, welfare and office accommodation for the workshop staff. The workshop would predominantly service and maintain vehicles based at the site but could occasionally be required to service other SUEZ waste vehicles on a limited ad hoc basis.
- 5.2. Internally, the majority of the building will be an open workshop area for the maintenance of vehicles. The northern section of the workshop will provide office and welfare facilities (along with storage) over two storeys. This area will provide toilets, showers, kitchen area and office space for the staff operating the workshop.
- 5.3. The wider WTS site operates under permission 643/APP/2002/1592 (provided at **Appendix B**) which includes permission for a workshop, with similar dimensions to the proposed workshop, directly adjacent to the WTS building. This workshop has not been built.
- 5.4. The construction of the building in the proposed location is possible due to SUEZ having recently acquired, via a long lease, an area of land directly to the south of WTS. This land is comprised of an area of land that previously formed part of the wider WTS, but was compulsory purchased by Cross Rail in 2013, and a separate parcel of land along the southern boundary of the existing WTS site. This additional land, whilst leased to SUEZ, does not benefit from a waste permit and cannot be used for the storage or processing of waste. Permission 643/APP/2002/1592 restricts total waste tonnage to 1030 tonnes per day. Permission 643/APP/2002/1592 relates only to the land within the planning 'red line'. The land to the south of the WTS is outside of this 'red line'. The development proposed in this application seeks permission for a workshop and associated infrastructure only.
- 5.5. The area of land within the original WTS planning boundary (permission 643/APP/2002/1592) was, prior to the compulsory purchase, used for bin storage and vehicle parking. During the period that it was under compulsory purchase it was used as laydown area and for construction work associated with Cross Rail. The additional parcel of land directly to the south of the WTS building has operated as industrial land and as a yard area for many years. During the construction work associated with Cross Rail it was used for vehicle parking, laydown area and construction works.
- 5.6. The workshop permitted under permission 643/APP/2002/1592 was 30 metres in width by 23.5 metres in length. The proposed workshop is approximately 18 metres by 22.8 metres.
- 5.7. As a similarly sized workshop is already permitted within the WTS site boundary, the staff associated with the workshop were already considered within the original application and therefore no additional staff are proposed under this application.
- 5.8. The wider site provides sufficient vehicle parking for the workshop staff. As an operational site, bin storage is already available for the separation of wastes and recyclable materials. Given the limited number of staff associated with the workshop the existing bin storage facilities are considered appropriate for the proposed development.
- 5.9. It is anticipated that the workshop would service on average 3 vehicles each day. As the majority of the vehicles are already based at the site, the vehicles which need to be serviced each day can remain parked on site until they need to be serviced.
- 5.10. Currently, the waste collection vehicles based at the site are driven off site to a third party location for servicing and maintenance. This generates an average of 6 HGV movements each day for the vehicles exiting and returning to site. If the workshop is constructed, these off site movements would stop as the vehicles would remain on site. The proposed workshop would co-locate a vehicle workshop onto the site where the majority of the HGVs are already located. This would provide an effective and efficient means of improving the operations of an existing site.

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- 5.11. No changes are proposed to be made to the site access as the vehicles will be able to use the existing site access on the northern boundary of the WTS.
- 5.12. The workshop is proposed to be located on land to the south of the existing WTS site. The WTS site has no restricted on hours and SUEZ is seeking the same flexibility for the vehicle workshop. Between 19:00 and 07:30 am the vehicle workshop will operate with the roller shutter doors closed except for the entrance and exit of vehicles. The workshop is located within land allocated under the London Plan and the Hillingdon Local Plan as a Strategic Industrial Location (SiL) which are identified as locations accommodating industrial-type activities able to operate on a 24-hour basis.

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## 6. ENVIRONMENTAL CONSIDERATIONS

6.1. This section of the report outlines the key environmental considerations.

### Transport

- 6.2. The proposed workshop will have no significant transport implications. The workshop would predominantly service and maintain vehicles based at the site but could occasionally be required to service other SUEZ waste vehicles on a limited ad hoc basis. The WTS site already has permission for a workshop which has not been constructed.
- 6.3. As a workshop is already permitted at the site, the staff and vehicle movements associated with the development have already been accounted for. The wider site provides sufficient vehicle parking for the workshop staff. No travel plan is required for this application.
- 6.4. It should be noted that the construction of the workshop would result in an overall small reduction in vehicle movements when compared to the current situation at the site as the waste collection vehicles based at the site would no longer be taken off-site for maintenance. This would result in a reduction of approximately 6-8 HGV movement per day.
- 6.5. As part of the proposed development, covered 'Sheffield style' cycle parking for 6 bicycles is proposed close to the site entrance. Details of the proposed cycle parking are provided at drawing Rbl-PLN-0925-07. The workshop will also provide shower and changing facilities to encourage staff to cycle or walk to work.

### Noise

- 6.6. A Sound Impact Assessment has been undertaken for the proposed development and is provided at **Appendix C**. The assessment concludes that there is a low likelihood of adverse impact on the basis of noise expected as a result of the proposed development.

### Flood Risk

- 6.7. The site is located within flood zone 1 and is under 1 hectare in size. However, the site does have a 1 in 30 year likelihood of surface water flooding for part of the area where the workshop is proposed. A flood risk assessment (FRA) has been produced and is provided at **Appendix D**.
- 6.8. The FRA concludes that the flood risks present at the site are low and that development on the site will be 'safe' in flood risk terms throughout its lifetime without increasing flood risk elsewhere.
- 6.9. As part of the pre-application response from LBH it is noted that a Scheme of Sustainable Water Management should be provided. This request is address at **Appendix E**.
- 6.10. As detailed in **Appendix E**, the guttering of the new workshop building will be specified to direct all roof runoff to a new rainwater harvesting tank. Water collected in the tank will be used for washing and dust suppression on the site reducing mains water consumption and the volume of storm water discharging from the site.
- 6.11. The rainwater harvesting tank will be a simple IBC container – an image of which is provided below.



Image 1: IBC container for collection of rainwater

### **Drainage**

- 6.12. The proposed development will be constructed on an area of hardstanding with existing drainage which has been in use for many years. The proposed development will tie into the existing surface water and foul water drainage already in situ. The minor amendments to the drainage are shown on drawing Rbl-PLN-0925-10 Proposed Site Drainage Plan.

### **Air Quality**

- 6.13. The proposed development would not impact upon the air quality of the area. The WTS site already has permission for a workshop. As a workshop is already permitted at the site, the staff and vehicle movements associated with the development have already been accounted for under the current extant planning permission.
- 6.14. When compared to the current situation at the site, the proposed workshop would lead to a small reduction in the number of HGV movements as the majority of vehicles associated with the site will be waste collection vehicles already based at the site which would remain on site for servicing rather than being driven off site to a third party location. The co-location of the workshop with the depot element of the site would reduce HGV movement by 6-8 movements each day. An air quality assessment is therefore not required as part of this application.

### **Archaeological Assessment**

- 6.15. The site has been in operation as an industrial site for many years and is entirely laid to hardstanding. The site is not located within an Archaeological Priority Area or Zone. An Archaeological assessment is therefore not required for this application.

### **Ecology, Tree Survey and BNG**

- 6.16. The proposed development would be located on an area of existing hardstanding with no vegetation present. No ecological or tree surveys are required for this application.
- 6.17. As requested by LBH, the statutory metric calculation and BNG plan have been completed and are provided at **Appendix F**. The BNG exemption statement included as part of **Appendix F** identifies that current legislation regarding compulsory BNG outlines that proposals which impact less than 25m<sup>2</sup> of on-site habitat are exempt from the 10% biodiversity net gain objective required by the Environment Act 2021. The completed BNG assessment confirms that due to the lack of any natural surface on-site the

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proposed development does not impact any habitat and it is considered to meet the above threshold exemption.

- 6.18. The proposed development will contribute to national and local biodiversity targets by providing new habitat features and measures to support wildlife species e.g. providing opportunities for nesting birds through the installation of nest boxes or the installation of invertebrate boxes to encourage the use of the site by a range of invertebrate species.
- 6.19. Overall, it is considered that the proposed development will result in a net increase in the biodiversity value of the site based on its pre-development (baseline) value. Which is considered to be in keeping with the key principals of the National Planning Policy Framework and relevant local planning policy.

### **Energy and Sustainability**

- 6.20. The main area of the building will be workshop space where vehicle are serviced and repaired. The workshop will be an open space with limited requirement for heating. The northern section of the workshop will provide office and welfare facilities along with storage.
- 6.21. An energy statement is provided at **Appendix G** and concludes that the proposals will meet the requirements of Part L and the specific requirements of the London Borough of Hillingdon Local Plan and the London Plan.
- 6.22. SUEZ will install a minimum of 3 PV panels onto the roof of the proposed workshop as required by the energy statement. At detailed design stage, it is possible that the total number of PV panels will increase. If this is the case, it is considered that any additional PV panels can be agreed through the prior approval process as detailed in The Town and Country Planning (General Permitted Development) (England) Order 2015 Class J – installation or alteration etc of solar equipment on non-domestic premises.
- 6.23. All toilets, sinks and showers will include water efficiency measures to reduce water use at the site. All lights within the building will be LED. Lighting within the office and welfare areas of the building will be on sensors which will switch off when no movement is detected.

### **External Lighting**

- 6.24. The workshop is proposed to be located within a wider operational site where lighting is already installed. As the site is already operations, limited external lighting is required with a total of 13no. lights required. These are proposed to be installed on the building. All details relating to the proposed lighting are provided at **Appendix H**.
- 6.25. The proposed external lights will be on a photocell and sensor. The lights will only come on during hours of darkness and will be on a motion sensor so only illuminate when movement is sensed. Lights will be illuminated for 5 minutes when triggered.
- 6.26. Given the limited lighting requirements, there is no requirement for any mitigation.

### **Contaminated Land**

- 6.27. The vehicle workshop is proposed to be constructed partly on land within the 'red line' boundary of the WTS and partly on the newly leased additional parcel of industrial land. The entire area is already hard surfaced (see photograph 1 above) with the eastern area previously used as part of the WTS site and the western area used most recently by Crossrail for vehicle parking, laydown area and construction works. A contaminated land assessment is therefore not required as part of this application.

### **Landscaping**

- 6.28. The proposed vehicle workshop is located on land to the south of the existing WTS which is entirely laid to hard surfacing. Given the industrial nature of the surrounding area no landscaping is proposed for this application.

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### **Landscape and Visual Impacts**

- 6.29. The proposed development is for a workshop on land to the south of the existing WTS. The site is surrounded by industrial units with an elevated railway line running along the southern boundary which effectively blocks line of sight from the south. The workshop will have no landscape and visual impacts.

### **Odour**

- 6.30. As part of the pre-application response from LBH it is noted that an odour assessment is requested. This is provided at **Appendix I**.

### **Other amenity impacts**

- 6.31. It is not considered that the proposals will have any effect upon other amenity impacts including dust and litter blow.

### **Utility Survey**

- 6.32. As an existing operational site, utilities are already present on site. Details of which are provided in **Appendix K**.

### **Statement of Community Involvement**

- 6.33. To raise awareness of the planning application among local stakeholders, SUEZ engaged with households directly to the south of the site on Denbigh Drive and Stormount Drive through a letter and door-knocking exercise on 9 June. This outlined the scope of the application and explained that a noise assessment would be undertaken to ensure the proposed workshop would not affect nearby properties. Residents were also reassured that the workshop would be used solely to service and maintain SUEZ waste collection vehicles, and that any off-site noise impacts would be minimal.
- 6.34. Further pre-application engagement took place on 8 September, when members of the site team visited neighbouring businesses on the industrial estate. These discussions highlighted that having a dedicated on-site workshop would reduce vehicle movements in the area, and confirmed there would be no changes to the site entrance, with vehicles continuing to access the site via the existing northern boundary of the waste transfer station.
- 6.35. Relevant representatives at Hillingdon Council were also notified of the forthcoming planning application via email on 11 September. This included the site's local ward councillors (Cllr Sansarpuri, Cllr Curling, Cllr Gardner), the Cabinet Member for Planning (Cllr Tuckwell), and the Cabinet Member for Community and Environment (Cllr Lavery).
- 6.36. Dedicated contact details were provided throughout all engagement activities, ensuring stakeholders had a clear point of contact for any enquiries. To date, the level of response has been limited, reflecting the modest scale of the application.

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## 7. PLANNING POLICY CONSIDERATIONS

### National Policy

- 7.1. National Planning Policy Framework (NPPF) sets out the governments planning policies for England and how these should be applied. The NPPF focuses on encouraging sustainable development and states at paragraph 38 that "...decision-takers at every level should seek to approve applications for sustainable development where possible." The NPPF sets out the government's planning policies for England and how these should be applied and is a material consideration in the determination of planning applications.
- 7.2. The most recent version of the NPPF was published in December 2024 (with minor amendments in February 2025).
- 7.3. NPPF paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development. The document in paragraph 8 outlines three dimensions to sustainable development which the planning system seeks to perform; an economic role, a social role and an environmental role.
- 7.4. Paragraph 9 goes on to state that *"These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area"*.
- 7.5. Paragraphs 85-89 sets out the Government's commitment to building a strong, competitive economy. They identify that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. They identify that significant weight should be placed on the need to support economic growth and productivity. The proposed vehicle workshop would allow for the co-location of a facility which will support the operation of the wider WTS and allow SUEZ to invest in the wider WTS site creating jobs whilst reducing HGV movements on the wider road network.
- 7.6. Paragraphs 115 – 118 seeks to promote sustainable transport and identifies at paragraph 116 that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety. A vehicle workshop is already permitted at the WTS but has not been built. The proposed vehicle workshop would result in a slight reduction in the number of HGV movements associated with the site when compared to the current situation.
- 7.7. Paragraphs 124 - 125 identifies that decisions should promote effective use of land and emphasises that substantial weight should be given to the use of brownfield land. The proposed vehicle workshop utilises existing developed land in a way which would allow for the wider WTS site to operate more effectively and efficiently.
- 7.8. Chapter 12 of the NPPF highlights the importance of well-designed places. As set out in the LBH pre-app response, the scale and appearance of the workshop are considered acceptable. Details of external materials are provided with the application as required.
- 7.9. Chapter 14 of the NPPF highlights the need for development to be planned to help reduce greenhouse gas emissions through location, orientation and design. The proposed development will allow for the co-location of vehicle workshop which would service the vehicles already based at the site. This would provide an effective and efficient means of improving the operations of an existing waste management facility. An energy statement is provided with the application at **Appendix G**.
- 7.10. Chapter 15 of the NPPF identifies that new development should be able to integrate effectively with existing businesses and communities. The proposed development is for the co-location of a facility which will improve the operations of the existing site and integrate effectively with the existing activities on the site.

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## Local Planning Policy

### Hillingdon Borough Council Local Plan

- 7.11. The Hillingdon Borough Council Local Plan is comprised of two documents, the Local Plan Part 1 and the Local Plan Part 2. These two documents form the council's future development strategy for the borough and sets out a framework and detailed policies to guide planning decisions.

#### Part 1 Strategic Policies (November 2012)

- 7.12. Policy E1 Managing the Supply of Employment Land. The Council will accommodate growth by protecting Strategic Industrial Locations. The site is located within a Strategic Industrial Location.
- 7.13. Policy E2 Location of Employment Growth. This policy identifies that most employment growth will be directed towards suitable sites in the Heathrow Opportunity Area, Strategic Industrial Locations (SILs), Locally Significant Employment Locations (LSEL), Locally Significant Industrial Sites (LSIS), Uxbridge Town Centre and Hayes Town Centre with a particular focus around transport nodes. The site is located within a SIL and therefore meets the requirements of this policy.
- 7.14. Policy EM8 Land, Water, Air and Noise Air Quality. The policy identifies that all development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors.
- 7.15. A vehicle workshop is already permitted within the site but has not been built. The proposed development would result in a slight reduction in the number of HGV movements associated with the site as the vehicles would remain on site rather than be taken off site for servicing.
- 7.16. Policy EM11 Sustainable Waste Management. This policy identifies that the council will seek to maximise the use of existing waste management sites through intensification or co-location of facilities.
- 7.17. The proposed vehicle workshop would co-locate a facility (vehicle workshop) that would service the vehicles already based at the site. This would provide an effective and efficient means of improving the operations of an existing waste management facility.

#### Hillingdon Local Plan Local Plan: Part 2 Development Management Policies (2020)

- 7.18. Policy DME 1 Employment Uses on Designated Employment Sites. This policy identifies that the council will support employment proposals in Strategic Industrial Locations (SILs) - Preferred Industrial Locations (PIL) or Industrial Business Parks (IBP) - in accordance with relevant policies in the London Plan.
- 7.19. The site is located within a SIL and would generate employment through the co-location of an industrial operation that would improve the efficiency and effectiveness of the wider site.
- 7.20. Policy DMHB 11: Design of New Development. This policy identifies that new development will be required to be designed to the highest standards, incorporate principles of good design.
- 7.21. The design of the propose workshop has been considered from the outset with the design of the workshop integrating into the wider site.
- 7.22. DMEI 2 Reducing Carbon Emissions. Policy identifies that all developments are required to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.
- 7.23. An energy statement is included with the application which demonstrates that the proposed development meets the requirements of the London Plan.
- 7.24. Policy DMEI 10 Water Management, Efficiency, and Quality. Policy requires applications for all new build developments (not conversions, change of use, or refurbishment) are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with the London Plan Hierarchy (Policy 5.13: Sustainable drainage) along

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with water efficiency measures, including the collection and reuse of rain water and grey water. Policy also identifies that all new development proposals will be required to demonstrate that there is sufficient capacity in the water and wastewater infrastructure network to support the proposed development.

- 7.25. Proposed development is located on an existing area of hardstanding with existing drainage that the building will tie into. The building will not increase the surface water run-off from the site. A flood risk assessment is provided with the application.
- 7.26. The building will have limited water use but toilets, showers and sinks will have water efficiency measures installed.
- 7.27. DMEI 11 Protection of Ground Water Resources. All development proposals within a Source Protection Zone, Safeguard Zone or Water Protection Zone must assess any risk to groundwater resources and demonstrate that these would be protected throughout the construction and operational phases of development.
- 7.28. Site is located within a Drinking Water Safeguard Zones (Surface Water) (England). **Technical Note – Overview of Water Risks** has been provided at **Appendix K**. The technical note concludes that the proposed Hayes WTS Workshop presents a low to very low risk to the local water environment.
- 7.29. DMEI 14 Air Quality. Policy identifies that A) Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants. B) Development proposals should, as a minimum: i) be at least “air quality neutral”; ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.
- 7.30. Wider site already has permission for a vehicle workshop which has not been built. Proposed development will co-locate a vehicle workshop onto the site where the majority of the vehicles are located. The development will slightly reduce the number of HGV movements associated with the site when compared to the current situation as the vehicles will no longer be taken off site for servicing. Air quality does not need to be considered as part of this development.
- 7.31. DMT 1 Managing Transport Impacts. Policy identifies that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner. Development proposals will be required to undertake a satisfactory Transport Assessment and Travel Plan if they meet or exceed the appropriate thresholds.
- 7.32. The wider site already has permission for a vehicle workshop that has not been built. The proposed development will result in a small reduction in HGV movements when compared to the current situation at the site. Given the limited development proposed, a Transport Statement and Travel Plan are not necessary for this development.
- 7.33. DMT 2 Highways Impacts considers vehicle access to the highway network, impacts on local amenity, safety for all road users and facilities for cyclists and pedestrians.
- 7.34. The proposal is for the construction of a vehicle workshop within an existing site. The vehicles serviced at the workshop are already based at the site and no changes are proposed to existing site access on the northern boundary. A ‘Sheffield Style’ bike rack is proposed next to the existing segregated pedestrian/cycle access gate.
- 7.35. DMT5 Pedestrians and Cyclists. The site already provides segregated pedestrian/cycle access and a covered cycle rack for 6 bicycles will be provided within the site boundary with direct access from the site entrance.
- 7.36. DMT6 Vehicle Parking. The wider site provides sufficient vehicle parking for the workshop staff.

#### The London Plan 2021

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- 7.37. The London Plan is the overall strategic plan for London and sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The London Plan is part of each of London's Local Planning Authorities' Development Plan and must be taken into account when planning decisions are taken in any part of Greater London. Planning applications should be determined in accordance with it, unless there are sound planning reasons (other material considerations) which indicate otherwise.
- 7.38. Policy GG2 Making the Best Use of Land – seeks to create successful, mixed-use places that make the best use of land.
- 7.39. A vehicle workshop is already approved at the site. The proposed vehicle workshop will co-locate a necessary service for the wider WTS within the site boundary making effective use of space within the site.
- 7.40. Policy GG3 Creating a Healthy City – seeks to improve Londoners' health and reduce health inequalities.
- 7.41. A vehicle workshop is already approved at the site. The proposed development will reduce the number of HGV movements associated with the site when compared to the current situation, by co-locating a much needed facility within the site boundary. The site will provide facility to encourage staff to travel to work sustainably.
- 7.42. Policy GG6 Increasing efficiency and resilience - To help London become a more efficient and resilient city seek to improve energy efficiency and support the move towards a low carbon circular economy, ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards.
- 7.43. An energy statement is provided with the application.
- 7.44. D3 Optimising site capacity through the design-led approach. Policy requires that all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site.
- 7.45. Proposed development will co-locate a facility that will improve efficiency of the site and reduce time spent moving vehicles to and from separate vehicle maintenance facilities.
- 7.46. Policy D11 Safety, security and resilience to emergency – *“Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather”*. The site is not open to the public and is securely fenced. The workshop will be a simple shed structure with limited office or welfare facilities and will have ventilation and air flow resulting from the roller shutter doors that will be open for vehicle movement.
- 7.47. Policy D12 Fire Safety – Requires all development proposals to achieve the highest standards of fire safety. Proposed development is not major development and does not require the submission of a fire statement but will meet requirements within 1-6 of the policy.
- 7.48. Policy D13 Agent of Change. Policy identifies that development proposals should manage noise and other potential nuisances by ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area
- 7.49. A sound impact assessment is provided at **Appendix C** which demonstrates that a low likelihood of adverse impact on the basis of noise is expected as a result of the proposed development.
- 7.50. D14 Noise. Policy seeks to reduce, manage and mitigate noise. A sound impact assessment is provided at **Appendix C** which demonstrates that a low likelihood of adverse impact on the basis of noise is expected as a result of the proposed development.

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- 7.51. Policy E4 Land for Industry, Logistics and Services to Support London's Economic Function. Seeks to ensure that a sufficient supply of land / premises to meet current and future demands for industrial functions. This policy seeks to ensure that there is a sufficient supply of employment land to meet current and future demand for industrial related functions including retention of waste management facilities. The area proposed for the development is allocated as SIL with the proposed development providing the co-location of an workshop that would improve the operational efficiency of the existing site.
- 7.52. Policy E5 Strategic Industrial Locations (SIL) seeks to proactively manage SIL's, and supports industrial, logistic and related type activities within them. The site is located within a SIL and would provide the co-location of a workshop that would improve the operational efficiency of the existing site.
- 7.53. Policy E11 Skills and opportunities for all. Development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases. The proposed development would provide up to 5 skilled vehicle maintenance roles.
- 7.54. Policy SI 2 Minimising greenhouse gas emissions. Policy identifies that non-residential development should achieve 15 per cent through energy efficiency measures.
- 7.55. An energy statement is provided at **Appendix F**.
- 7.56. Policy SI4 Managing heat risk. Policy seeks to minimise internal heat gain and impacts of the urban heat island effect. The proposed development is a workshop with limited need for heating and cooling. Air flow would naturally occurring through the opening of the roller shutter doors for access of plant and vehicles.
- 7.57. Policy SI5 Water Infrastructure. This seeks to protect and conserve water supplies and resources. The workshop is a simple shed design with limited welfare facilities. Showers and toilets will utilise water saving devices such as dual flush toilets and non-concussive taps.
- 7.58. Policy SI8 Waste Capacity and Net Waste Self-sufficiency. This policy identifies that existing waste management sites should be safeguarded and the waste management capacity of existing sites should be optimised. The policy goes on to set out the criteria that material and waste management proposals should be evaluated against.
- 7.59. Whilst the workshop will be partially built onto land that is within the WTS planning boundary, this area of land was previously compulsory purchased by Cross Rail and has been out of use for waste management for a decade. A workshop is already permitted under the extant permission for the site and the proposed workshop will complement the work undertaken at the site and will not impact on the ability of the WTS to operate.
- 7.60. Policy SI12 and SI13 Flood Risk Management and Sustainable Drainage. SI12 seeks to manage flood risk from all sources across London and SI13 requires developments to achieve greenfield run off rates and manage surface water run-off.
- 7.61. The site is situated within flood zone 1, an area with a low probability of flooding. However, part of the development footprint potentially falls within an area at risk of surface water flooding. A flood risk assessment is provided with the application.
- 7.62. The proposed development is for a building to be installed within an area of existing hardstanding and will not create any additional surface water run off for the site. The site benefits from existing surface water and foul water connection points which SUEZ will be able to tie into.
- 7.63. Policies T1, T2, T3 and T4 relate to transport and identify that all development should make the most effective use of land / sustainable transport and ensure that any impact on London's transport networks is mitigated. The policies seek to deliver patterns of land use that facilitate shorter, more regular trips by walking or cycling, and reduce the dominance of vehicles and requires development proposals to provide

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adequate transport functions. The policies also detail requirements regarding the submission of Transport Assessments and Travel Plans and the requirement for mitigation to address any adverse impacts.

- 7.64. The proposed workshop would only service and maintain waste collection vehicles, the majority of which are already based at the site. There would be an overall small reduction in vehicle movements, when compared to the current situation, as the waste collection vehicles would no longer be taken off site for maintenance
- 7.65. A transport statement and travel plan are not required for this proposal. Cycle parking is proposed and shower and welfare facilities will be provided to encourage staff to cycle or walk to work.

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## 8. SUMMARY AND CONCLUSION

- 8.1. SUEZ proposes to construct a vehicle workshop building for the maintenance of waste collection vehicles. The workshop is proposed to be located on land to the south of the operational SUEZ Waste Transfer Station at Rigby Lane, Hayes.
- 8.2. The building would accommodate a three bay workshop with storage, welfare and office accommodation for the workshop staff. The workshop would predominantly service and maintain vehicles based at the site but could occasionally be required to service other SUEZ waste vehicles on a limited ad hoc basis.
- 8.3. It has been demonstrated that this proposed development complies with policy on both a local and national level.
- 8.4. It is not considered that this application will result in any adverse effects upon residential amenity or upon statutory designations.
- 8.5. Taking the above into account it is considered that the proposed development should be approved at the earliest opportunity.