



Supporting Statement

Link Park Road

KHC Management Services Ltd

Document Reference: 487/13—R1.0 – Supporting Statement



Minerals
Waste
Environment

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1. Introduction

1.1. General

1.1.1. MPG have been instructed by KHC Management Services Limited (KHC) to prepare a Planning Application and accompanying Supporting Statement, regarding a proposed waste management facility, on land to the east of Link Park Road, Thorney Mill Road, West Drayton ('The Site').

1.1.2. The proposed development comprises the following:

"Waste management facility, including a part change of use from open storage, for the storage, treatment and recycling of metals, including End-of-Life Vehicles, with associated new surfacing and drainage infrastructure, de-pollution building, site office, welfare facilities, carparking, boundary wall and weighbridge"

1.2. Site Description

1.2.1. The Site comprises an approximate 0.37ha plot of land, located to the north of Thorney Mill Road, West Drayton. The Site features a hardstanding surface, consisting mostly of tarmac and type 1 granite, alongside two small concrete pads.

1.2.2. The Site falls partially within both Hillingdon Borough and Buckinghamshire. Identical planning applications are to be submitted to both Hillingdon Borough Council and Buckinghamshire Council. Approximately 0.2ha of The Site lies within Hillingdon and the other 0.17ha lies within Buckinghamshire¹.

1.3. Aim of proposed development

¹ Drawing 487/13_D1 shows the area of The Site that falls within each Authority area

1.3.1. The aim of the proposed development is to bring a, currently disused, plot of previously developed land into beneficial use, by providing metals and ELV recycling capacity to the area.

1.4. Application documents

1.4.1. The Planning Application comprises the following documents:

- Application Forms
- Supporting Statement
- Transport Statement
- Preliminary Ecological Appraisal
- River Morph Survey
- Biodiversity Net Gain Assessment
- Arboricultural Impact Assessment
- Landscape and Visual Appraisal
- Noise Impact Assessment
- Air Quality Assessment
- Carbon and Energy Statement
- Flood Risk Assessment and Drainage Strategy
- Location Plan
- Site Layout Plan
- Elevation Plans

2. Site Description

2.1. General Description

2.1.1. The Site comprises an approximate 0.37ha plot of land, located to the north of Thorney Mill Road, West Drayton. The Site is located within both Hillingdon Borough and Buckinghamshire.

2.1.2. The location of The Site is shown on drawing reference 487/13_D1.

2.2. Site Description

2.2.1. The Site currently sits within a wider industrial complex, having been partitioned from the rest of the complex as an individual plot for at least 5 years, whilst retaining the benefit of an existing access along Link Park Road. The Site features a hardstanding surface, mostly made up of tarmac and type 1 granite, as well as two concrete pads. The Site features existing palisade fencing along the perimeters, an existing gate at the entrance to the wider complex at Link Park Road, alongside a further gate at the entrance to the individual plot of land.

2.2.2. The Site is accessed via Thorney Mill Road to the south, which connects to Link Park Road.

2.2.3. Other development upon the wider complex includes:

- Thorney Mill Aggregate Depot and railway sidings to the northwest², including a large industrial / warehouse building;
- Open storage and vehicle parking to the south.

² Including permitted aggregate and waste uses.

- 2.2.4. Bigley Ditch, a statutory main river, is located immediately to the east of The Site. The Site therefore falls within the riparian zone of Bigley Ditch (within 10m of the bank top), although it is already an existing hardstanding area at a higher elevation than the watercourse.
- 2.2.5. The closest residential properties are situated to the east of Link Park Road, approximately 100m to the south. Further mobile homes are located at Mayfield Park, approximately 155m to the south, as well as along Thorney Mill Road, approximately 295m to the southwest.
- 2.2.6. The Site's wider surroundings include Thorney Country Park approximately 150m to the south, Thorney Park Golf Club approximately 160m to the west and the settlement of West Drayton to the east.
- 2.2.7. The Site also falls within the boundary of the Colne Valley Regional Park, comprising over 11,000ha of parks, green spaces and open water areas along the valley of the River Colne. As The Site is an area of hardstanding within a wider industrial complex, it does not strongly contribute to the purposes of the Colne Valley Regional Park in its existing form, even though it is adjacent to protected habitats associated with Bigley Ditch. The River Colne is located approximately 185m to the east of The Site.
- 2.3. Green Belt
- 2.3.1. The Site is located within the Green Belt. An assessment of Green Belt policy is provided in 4.4.5 of this Supporting Statement.
- 2.3.2. Hydrology and hydrogeology
- 2.3.3. The majority The Site is located within Flood Zone One, meaning there is a low probability of flooding. However, part of The Site's eastern boundary lies within Flood Zones 2 and 3. The planning application is accompanied by a

Flood Risk Assessment and Drainage Strategy, which sets out that both the 1%AEP2OCC and the 0.1%AEP remain within the banks of the channel.

2.3.4. The Site is located within the Lower Thames Drinking Water Safeguard Zone for surface water. The Site's superficial deposits are also designated as a Principal Aquifer, with The Site designated as having medium-high groundwater vulnerability.

2.3.5. According to the British Geological Surveys GeoIndex, the Site's superficial geology is the Shepperton Gravel Member and the Site's bedrock geology is the London Clay Formation.

2.4. Ecology

2.4.1. The planning application is accompanied by a Preliminary Ecological Appraisal, River Morph survey and Biodiversity Net Gain Assessment.

2.4.2. Bigley Ditch is to the east of The Site (within 1.5m), with The Site falling within the riparian zone of this watercourse. There is also priority deciduous woodland approximately 9m to the north of The Site and priority open mosaic habitat approximately 4m to the east of The Site.

2.4.3. Hillingdon Borough Council's Policies Map, at very low resolution, shows the boundary of a Nature Conservation Site of Metropolitan or Borough Grade I Importance falls upon the part of The Site that lies within Hillingdon. This designation is associated with the Lower Colne Metropolitan Site of Importance for Nature Conservation, including Frays and Mabey's meadow Island Nature Reserve. The Site is entirely hardstanding, therefore whilst Hillingdon Borough Council's Policies Map shows this designation falls upon part of The Site, it is not reflective of The Site's physical characteristics.

Furthermore, the Planning Datamap for the London Boroughs³ shows the entirety of The Site falls outside of the Lower Colne Site of Importance for Nature Conservation.

- 2.4.4. The Site also lies within the impact risk zone for Wraysbury Reservoir SSSI and Staines Moor reservoir SSSI, approximately 4.3km to the southwest of the proposed recycling facility.

2.5. Public Rights of Way (PROW)

- 2.5.1. There are no PROWs upon The Site. The nearest PROW within Buckinghamshire is footpath IVE/16/2, which is approximately 285m to the west of the proposed recycling facility and to the west of Thorney golf course. Public footpath IVE/21/3 is also located approximately 290m to the north of the proposed recycling facility and to the north of Frays Island and Mabey's Meadow Nature Reserve.

- 2.5.2. The nearest PROW within Hillingdon is footpath is Y10, which is approximately 370m to the south of The Site and south of Thorney Mill Road.

2.6. Heritage

- 2.6.1. There are no known, designated heritage assets upon or adjacent to The Site. The closest Listed Buildings are located in West Drayton, the nearest being approximately 300m to the southeast. The Site would be well screened from the closest Listed Buildings by existing vegetation and development. The Site is not located within, or adjacent to, a conservation area.

- 2.6.2. The boundary of an Archaeological Priority Zone falls upon the part of The Site that lies within Hillingdon. As The Site contains existing hardstanding and has

³ Available at: <https://apps.london.gov.uk/planning/>

been developed for several decades, it is not reasonably considered that an archaeological assessment is required for this application.

2.7. Pre-Application Advice

2.7.1. Pre-Application advice was received from Buckinghamshire Council, dated 20/02/2026. The advice set out the requirements considered necessary by Buckinghamshire Council for a planning application, as well as the requirement to submit an EIA screening request.

2.8. EIA Screening

2.8.1. The proposed development falls under Schedule 2, part 11 (e) (ii) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, referring to the storage of scrap iron, including scrap vehicles, where a deposit is to be made or scrap stored within 100 metres of any controlled waters. In this instance, the proposed development is within 100m of Bigley Ditch: a statutory watercourse.

2.8.2. An EIA screening request was submitted to Buckinghamshire Council, where it was concluded that the proposed development would not constitute EIA development (reference SCREEN/08/26), subject to proposed mitigations.

2.8.3. Buckinghamshire Council set out in their screening response that potential impacts of the proposals on natural resources would be “*minor*” and “*unlikely to lead to the direct loss of habitat*”. They also set out that pollution risk, including dust, noise and risk of contamination, could be managed via the necessary permits from the Environment Agency and necessary planning conditions.

2.8.4. Furthermore, the screening response set out that there would be “*minimal potential for operational dust, noise and visual impacts*”, with “*the intensity of*

the proposed metal recycling facility not expected to be particularly significant". With regard to proposed HGV movements, Buckinghamshire Council set out this is not expected to have a *"significantly adverse impact above existing overall HGV movements"*.

2.9. Relevant Planning History and Previous Uses

2.9.1. The Site has a complex planning history, with several planning applications covering The Site and the wider industrial complex. Much of the planning history covering the wider industrial complex relates to development to the west of The Site. As stated, it appears that The Site has been partitioned as an individual plot, since at least 2020.

2.9.2. The part of The Site that lies within Buckinghamshire is safeguarded as an Aggregate Depot/Rail Waste Transfer Station (Thorney Mill), in conjunction with the surrounding complex to the west. This safeguarding appears to tie to historic minerals development concerning the storage of aggregates and production of asphalt and coated roadstone (reference BD/111/79). The wider safeguarding area to the west also has previous, permitted wastes uses (including permission reference SBD/8207/96). Therefore, there are other permitted waste uses upon the wider industrial complex, although The Site itself has not previously been permitted as a waste management facility.

2.9.3. Enforcement action has been carried out in relation to unauthorised waste use upon the wider complex, however the pre-application advice states that this *"does not consist of, or intrude into, the proposed application site"*.

2.9.4. The Site was most recently used for open storage.

2.9.5. The known and relevant planning applications covering The Site for Buckinghamshire are provided in Table One, none of which were permitted.

The majority of these applications do not just cover The Site; they relate to a wider area of the industrial complex.

Description	Decision	Reference	Notes
Proposed change of use from scrap yard to scrap yard and recycling of waste materials, Thorney Mill Sidings, Thorney Mill Lane, Iver-	Refused 2000	SBD/8210/0 0	
Application for a Certificate of Lawfulness for: Existing use as storage or distribution	Withdrawn (12 April 2017)	16/01319/CL UED	
Outline planning permission for demolition and redevelopment to comprise a data centre (Sui Generis (Data Centre)) of up to 55,000sqm (GEA) (excluding gantries) including ancillary offices, internal plant & equipment and fuel storage; creation of servicing areas and provision of associated services, including waste, refuse, cycle storage and lighting; and for the laying out of the buildings; routes and open spaces within the development; all associated and ancillary works and operations	Appeal dismissed (13/12/2022)	PL/21/4584/ OA	The Inspector concluded the development would constitute inappropriate development in the Green Belt, would have a significant adverse effect upon the overall level of openness of the Green Belt, would have an adverse effect on the character and appearance of the surrounding area and would give rise to adverse effects on air quality.

including but not limited to: demolition; earthworks; provision of attenuation infrastructure, engineering operations.			
Part retrospective application for use of site as B8 use and rail borne storage and siting of 4 ancillary buildings, an electric substation, 9 x lighting columns and replacement boundary fence and gate	Unknown / awaiting decision	17/0235/FU L	Officer's report to Planning Committee recommended that the application be delegated to the head of planning and economic development to approve, subject to the satisfactory prior completion of a Section 106 Planning Agreement.
Certificate of lawfulness for proposed use of land for industrial storage	Council failed to determine – appeal in progress	PL23/4001/ SA and APP/NO410 /X/24/3345 670	
Certificate of Lawfulness for proposed use of land for industrial outdoor storage	Refused 2024	PL/24/1913/ SA	Council considered the proposed use to amount to a material change of use, therefore requiring planning permission

*Table 1 showing The Site's relevant planning history provided on
Buckinghamshire Council's online planning application search*

2.9.6. The known and relevant planning history covering The Site for Hillingdon
include the following three applications provided in Table Two.

Description	Decision	Reference	Notes
Perimeter fencing (Application for a Certificate of Lawful Development for an Existing Development)	Approved 21/05/2020	73420/APP/2020/1042	Includes fencing along part of The Site's eastern boundary
Use of site as open storage (Application for a Certificate of Lawful Development for an Existing Development)	Approved 20/05/2020	73420/APP/2020/1076	
Use of site for Class B8 open storage use and erection of security fence, ancillary buildings and structures	Refused 15/06/2018	73420/APP/2017/4617	Refused due to Hillingdon Council assessing the proposal as inappropriate development within the Green Belt

Table 2 showing The Site's relevant planning history provided on Hillingdon Borough Council's online planning application search

2.9.7. The part of The Site that lies within Hillingdon (the larger area of the proposed recycling facility) has a Certificate of Lawful Existing Use for open storage (permission reference 73420/APP/2020/1076). A part change of use is therefore being applied for.

2.10. Community Infrastructure Levy (CIL)

- 2.10.1. The Site lies within the administrative area for South Bucks District Council and is subject to South Bucks CIL Charging Schedule. The provisions for CIL are set out by Part 11 of the Planning Act 2008, the Localism Act 2011 and the CIL Regulations (as amended). Planning Practice Guidance states that the County Councils collect the levy charged by district councils on developments for which the county gives consent, for example waste sites where they are liable for the levy.
- 2.10.2. The relevant charging schedule relates to the erection of, or extensions to, buildings creating over 100 square metres net new additional gross internal floor space. Certain developments are exempt from CIL liability. As the proposed development does not fall within an exemption, the relevant rate for the South Bucks District would be £41.92/square metre⁴.

⁴ Based on the rate for all development types, other than those otherwise stated in the table of charges

3. Proposed Development

3.1. The proposed development is for a waste management facility, including a part change of use, for the storage, treatment and recycling of metals, including End-of-Life Vehicles (ELVs).

3.2. Waste operations

3.2.1. The proposed operations would include metal recycling and vehicle dismantling, involving the sorting, separation and storage of materials. The proposed layout of the development is provided on drawing no 3119-006-01 (Rev E), prepared by Oaktree Environmental.

3.2.2. The annual throughput is estimated to be less than 25,000 tonnes of waste metals and less than 5,000 tonnes of ELVs (29,998 tonnes per annum in total).

3.2.3. The exact types of wastes to be accepted at The Site would be regulated by the necessary Environmental Permit issued by the Environment Agency, however, would include hazardous wastes ordinarily associated with metals and ELV recycling. The maximum quantity of hazardous waste stored at The Site at any one time would not exceed 50 tonnes (of which, no more than 10 tonnes would be stored for disposal).

3.2.4. Imported wastes and waste handling operations would be subject to strict environmental controls, regulated by the necessary Environmental Permit.

3.2.5. Waste metals would be recycled into different components and stored in stockpiles. The Site would likely operate two 360 excavators and a forklift truck (or similar machinery associated with this type of facility), to sort wastes into different types. Manual sorting, separation and cutting of materials using hand-held equipment would also take place.

- 3.2.6. ELVs would be moved inside to be depolluted, for example, for the removal of brake fluid or engine oil. Hazardous substances would be stored in accordance with the necessary Environmental Permit, upon a sealed drainage system.
- 3.2.7. Certain hazardous wastes would be stored externally within the designated storage area, in accordance with the necessary Environmental Permit. Batteries would be stored in sealed containers.
- 3.2.8. Wastes would be transported to The Site using HGVs, including Roll on and Roll Offs and Skips, with approximately 40 two-way movements per day (20 inward movements and 20 outward movements). It is anticipated that a HGV routing strategy would be conditioned.
- 3.3. Construction
- 3.3.1. The proposed development includes a new 300mm thick concrete floor slab with impermeable joints and a 300mm high perimeter kerb. The proposals would also feature a new 4m high concrete wall, along part of the northern, eastern and southern boundaries of the recycling facility (see drawing 3119-006-01 (Rev E) for the location), as well as retained, existing perimeter fencing along the remainder of the Site boundaries.
- 3.3.2. The proposed de-pollution building would have an internal floor area of approximately 155 sq m, featuring roller shutter doors, a steel exterior and an elevation of approximately 3.5-4m at its eaves. The proposed de-pollution building would be significantly smaller than the warehouse building to the northwest of The Site.

3.3.3. The proposals would also feature a small office cabin and a welfare cabin (portacabins), the locations of which are provided on drawing 3119-006-01 (Rev E).

3.3.4. The Site would include retained entrance gates to the northwest of the recycling facility and a fire exit to the southwest of the recycling facility, as well as existing security gates upon entry to the wider industrial complex.

3.4. Parking

3.4.1. Three standard parking bays and one disabled parking space would be provided onsite, to accommodate staff members and visitors.

3.5. Hours of operation

3.5.1. The Site would operate between the hours of 08:00-18:00 Monday-Friday and 08:00-13:00 on Saturdays.

3.6. Drainage Infrastructure

3.6.1. The planning application is accompanied by a Flood Risk Assessment and Drainage Strategy, which sets out the drainage plan for the proposed operations.

3.6.2. Sub-surface drainage infrastructure would be installed prior to operations commencing; this would include a sealed tank with a minimum attenuation capacity of 8m³ for the hazardous storage area, as well as a sub-surface oil interceptor and a 199.5m³ geo-cellular tank for the remainder of external yard.

3.6.3. All run-off intercepted from the hazardous storage area would be taken off-site to a licensed facility, for treatment or disposal.

3.6.4. The proposed geo-cellular tank would limit the run-off rate from the external yard to 1.9 l/s. The Site would also contain a subsurface oil interceptor upstream of the attenuation tank, to remove pollutants and safeguard water quality. Surface water run-off would pass through the interceptor and discharge into the adjacent watercourse, requiring a discharge license from the EA.

3.6.5. Rainwater harvesting from clean roof water would also take place onsite. Further details are provided in the Flood Risk Assessment and Drainage Strategy.

3.7. Noise Impacts

3.7.1. The planning application is accompanied by a Noise Impact Assessment. The proposals are not considered to have a significant adverse noise impact and would not require any additional mitigation beyond good practice measures.

3.8. Dust and Air Quality Impacts

3.8.1. The proposed operations would not be expected to give rise to significant dust emissions. The Site is, however, situated within two Air Quality Management Areas. The planning application is accompanied by an Air Quality Assessment, which sets out that the development can be carried out in a manner unlikely to cause significantly adverse dust impacts, with reference to best practice guidance. This assessment also provides an assessment of emissions for PM₁₀ and PM_{2.5}, concluding that the proposed development is unlikely to have a significant impact on particulate matter concentrations regarding the relevant Air Quality Objectives.

3.9. Fire Safety

- 3.9.1. The Site would operate under a Fire Prevention Plan, to be approved by the EA as part of the Environmental Permit application. This plan would provide details of relevant fire prevention and suppression measures.

4. Policy Review

4.1. Section 70(2) of the Town and Country Planning Act (1990) states that, in dealing with an application for planning permission, the authority shall have regard to the provisions of the development plan, so far as material to the application.

4.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 also states that, if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.

4.3. The relevant national planning policies and Development Plan for The Site comprise the following documents, so far as they are material to the application:

- National Planning Policy Framework (last updated 2025)
- National Planning Policy for Waste
- National Planning Practice Guidance on Green Belt
- Buckinghamshire Minerals and Waste Local Plan 2016-2036 (adopted July 2019)
- South Bucks District Local Plan (adopted March 1999 and consolidated September 2007 and February 2011)
- South Bucks Core Strategy (adopted February 2011)
- The Ivers Neighbourhood Plan (adopted October 2022)
- West London Waste Plan (adopted July 2015)

- Hillingdon Local Plan Part 1 – Strategic Policies (adopted November 2012)
- Hillingdon Local Plan Part 2 – Development Management Policies (adopted January 2020)
- Hillingdon Local Plan Part 2 – Site Allocations and Designations (adopted January 2020)
- The London Plan (2021)

4.3.1. An assessment of adopted policies most relevant to the proposed development is set out in the following paragraphs.

4.4. National Planning Policy Framework (NPPF)

4.4.1. The NPPF provides the government's approach to planning for England and how it should be applied at the local scale. The purpose of the planning system is to contribute to the achievement of sustainable development.

4.4.2. Paragraph 8 defines the economic, social and environmental objectives of sustainable development. Part of the environmental objective of sustainable development includes using natural resources prudently and minimising waste and pollution. Minimising waste and using resources prudently is particularly relevant to the proposed development.

4.4.3. Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development, whereby proposals that accord with an up-to-date development plan should be approved without delay.

4.4.4. Paragraph 116 of the NPPF, in relation to highways, sets out that development should only be prevented or refused on highways grounds, if there would be an unacceptable impact on highway safety, or the residual cumulative

impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios. The planning application is accompanied by a Transport Statement; the proposed uplift in HGVs is not expected to significantly impact the surrounding highway network, due to the low expected frequency of vehicle movements per hour.

- 4.4.5. The Site is located in the Green Belt. Paragraph 142 of the NPPF sets out that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently 'open', with the essential characteristics of the Green Belts being their openness and permanence. Paragraph 143 then sets out the five purposes the Green Belt intends to serve.
- 4.4.6. Paragraph 153 of the NPPF sets out that, in relation to proposals affecting Green Belt land, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness, other than in the case of development on previously developed land or grey belt land, where development is not inappropriate. The Site is not considered to comprise inappropriate development; an assessment of which is provided below.
- 4.4.7. Impacts on openness as a result of the proposals would also be limited by the height and mass of the proposed buildings, particularly relative to the existing building to the northwest. Any openness currently experienced at The Site is also a function of the man-made hardstanding, as opposed to a lack of anthropogenic features.
- 4.4.8. Paragraph 155 sets out that other development in the Green Belt should not be regarded as inappropriate where all the following apply:

- a) The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- b) There is a demonstrable unmet need for the type of development proposed
- c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and
- d) Where applicable, the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157.

4.4.9. For the purposes of plan making and decision making, ‘grey belt’ is defined in the NPPF as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development; this includes land at risk of flooding.

4.4.10. Buckinghamshire’s 2015 Green Belt Assessment designates The Site as Green Belt in relation to General Area reference 97 (see drawings 5.1b, 5.2b, 5.3b, 5.4b and 5.5b of the 2015 Green Belt Assessment). General Area reference 97 comprises 164.2ha of Green Belt land within South Bucks, of which The Site makes up <1% of the total area.

4.4.11. The draft Buckinghamshire Green Belt Assessment was published in February 2026, focusing on identifying grey belt land within Buckinghamshire’s Green Belt. The Site is included within Assessment Area reference LO004. Assessment Area reference LO004 is assessed as “*provisional grey belt*”,

meaning it does not contribute strongly to either purposes A, B or D of the Green Belt⁵, however is “*provisionally constrained*”, due to one or more of the areas or assets listed within footnote 7 of the NPPF. Paragraph 006 of Planning Practice Guidance on Green Belt sets out that where areas of grey belt would be covered by or affect other designations in footnote 7 of the NPPF, it may only be possible to provisionally identify such land as grey belt, in advance of more detailed specific proposals.

- 4.4.12. Paragraph 009 of Planning Practice Guidance on Green Belt sets out that where grey belt sites are not identified in existing plans or Green Belt assessments, it is expected that authorities should consider evidence, in light of the PPG. A Site-specific assessment of grey belt is therefore provided.
- 4.4.13. Purpose A of the Green Belt is to check the unrestricted sprawl of large built-up areas (not including villages). The nearest built-up areas to The Site are West Drayton (to the east) and Iver (to the northwest). The Site is not immediately adjacent to either of those built-up areas and is an existing hardstanding area situated upon a wider industrial complex. The proposed development would not result in an incongruous pattern of development relative to the wider complex. Therefore, The Site provides no more than a moderate contribution to purpose A.
- 4.4.14. Purpose B of the Green Belt is to prevent neighbouring towns merging into one another. Again, The Site does is not immediately adjacent to any neighbouring towns, being situated on a wider industrial complex and forming a nominal area of the Green Belt. As such, The Site does not form a substantial gap between towns or result in the loss of visual separation of towns.

⁵ Note that Area LO004 is assessed as having a moderate contribution towards purposes A and B and a weak contribution to purpose D, within the draft Buckinghamshire Green Belt Assessment

Therefore, The Site provides no more than a moderate contribution to purpose B and only by virtue of its existing industrial nature.

- 4.4.15. Purpose D of the Green Belt is to preserve the setting and special character of historic towns. The Site does not form part of the setting of a historic town, nor does it have a visual, physical, or experiential connection to the historic aspects of any historic town, therefore making no contribution to purpose D.
- 4.4.16. As described, the NPPF's definition of grey belt sets out that grey belt excludes land where the areas or assets provided in footnote 7 of the NPPF would provide a strong reason for refusing or restricting development. The eastern boundary of The Site falls within Flood Zones 2 and 3. On a Site-specific basis, an assessment of whether The Site comprises 'grey belt land' therefore hinges upon whether the application of the NPPF policies relating to flooding would provide a strong reason for refusing or restricting development.
- 4.4.17. The planning application is accompanied by a Flood Risk Assessment and Drainage Strategy, which sets out that The Site is deemed to be at **very low** risk of fluvial flooding based on detailed hydraulic modelling data provided by the EA; no provision for flood compensation is therefore required. A Drainage Strategy is also provided to limit the discharge of surface water from The Site, taking account of the 1%AEP40CC storm event. Consequently, there is not a strong reason to refuse or restrict the development based on flood risk grounds.
- 4.4.18. For the above reasons, The Site is considered to comprise grey belt.
- 4.4.19. Paragraph 155 (a) of the NPPF also sets out that proposed development upon grey belt land should not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the wider area of the plan. As set out, The Site comprises a nominal area of the wider Green Belt designation in

Buckinghamshire and Hillingdon and is situated upon a wider industrial complex. The proposed development would, therefore, not undermine the purposes of the Green Belt within the wider plan area.

- 4.4.20. Part (b) of paragraph 155 of the NPPF requires that, in respect of grey belt land, there is a demonstrable, unmet need for the type of development proposed. An assessment of need is provided below, with the need argument principally drawing upon commercial factors.
- 4.4.21. The Buckinghamshire Minerals and Waste Local Plan outlines a shortfall of 0.465 million tonnes per annum of municipal and C&I waste recycling capacity for 2026. The C&I waste stream would likely be the most relevant waste stream for this application, however, The Site would be a specialised facility for metals and vehicle recycling.
- 4.4.22. The Review of the Buckinghamshire Minerals and Waste Local Plan, undertaken in September 2025 ('The Review'), confirmed that the targets for additional recycling capacity in Buckinghamshire have not been achieved. Similarly, the pre-application advice set out that *...in principle, there is a need for further waste recycling sites to come forward...*. On a general level, there is a defined need for additional recycling capacity to come forward through the Development Plan in Buckinghamshire regarding the C&I waste stream.
- 4.4.23. However, Buckinghamshire Council exclude metals and ELV recycling from their total recycling capacity assessments and subsequent targets for recycling, due to the potential for their inclusion to lead to overestimates in the actual recycling capacity and subsequent need. No individual capacity assessment or needs figures are, however, provided for metals and ELV recycling facilities.

- 4.4.24. Similarly, an independent needs assessment for metals and ELV recycling is neither provided in the West London Waste Plan. The West London Waste Plan sets out that the waste capacity gap (383,000 tonnes for 2026) for the management of MSW and C&I waste for the six west London Boroughs will be delivered across the plan period through a list of allocated sites. The allocations broadly consist of waste transfer facilities, which differ to the proposed development.
- 4.4.25. In turn, the waste capacity assessment for both Buckinghamshire and the West London Boroughs does not correlate well with Green Belt and grey belt policy tests; specifically, regarding the requirement to demonstrate an ‘unmet need’ for the type of development proposed. An unequivocal assessment of need for the proposed development, therefore, cannot reasonably be provided in the context of the Development Plan. The needs assessment must instead be based on commercial factors and reasonable professional judgement.
- 4.4.26. The Buckinghamshire Minerals and Waste Local Plan identifies 12 existing facilities that contribute to metal recycling capacity (including vehicles) within Buckinghamshire; this includes Iver Recycling at Court Lane Industrial Estate (trading as Paynes Metal Recycling). Paynes Metal Recycling is expected to close imminently because of the proposed redevelopment of the wider Court Lane Industrial Estate.
- 4.4.27. Outline planning permission, with all matters reserved, for the demolition of Court Lane Industrial Estate and redevelopment to comprise a data centre (reference *PL/22/4145/OA*), was allowed at an appeal in 2024. The reserved matters application is currently being determined by Buckinghamshire Council.

- 4.4.28. The expected closure of the metal and ELV recycling facility at Court Lane means there is a prevailing need for a new facility to come into effect, to replace the resultant loss in capacity. It is reasonable to conclude that there is a need for the proposed development, particularly given the limited number of permitted facilities within the surrounding area and the silence of the Development Plan on the capacity requirement for metals and ELV recycling facilities. There is also likely to be a greater need for such facilities now, compared to when the Development Plan was adopted, given the anticipated growth over the Development Plan period.
- 4.4.29. Paragraph 110 of the NPPF relates to sustainable transport, setting out that significant development should be focused at locations which are or can be made sustainable. Development should also understand and address the potential impacts of development on transport networks. Paragraph 115 of the NPPF also sets similar transport-related requirements, including in relation to the design of transport elements.
- 4.4.30. The planning application is accompanied by a Transport Statement and Air Quality Assessment, which respectively assess the impacts of the proposed vehicle movements on the highway network and local air quality. No significant adverse impacts are predicted in relation to the operation of the highway network, nor local air quality, as a result of the proposed operations.
- 4.4.31. Part d of paragraph 155 of the NPPF states that, where applicable, development should meet the 'Golden Rules' requirements set out in paragraphs 156-157. Paragraphs 156-157 concern major development involving the provision of housing; therefore, they are not relevant to the proposed development.

- 4.4.32. Paragraph 170 of the NPPF, in relation to flood risk, sets out that inappropriate development in areas at risk of flooding should be avoided. Paragraph 181 of the NPPF also sets out that, when determining any planning application, local planning authorities should ensure that flood risk is not increased elsewhere. The planning application is accompanied by a Flood Risk Assessment and Drainage Strategy, which sets out that The Site is at a very low risk of fluvial flooding.
- 4.4.33. Whilst there are few NPPF policies that directly address waste management development, paragraph 223 (b) sets out, in part, that planning policies should take account of the contribution that recycled materials would make to the supply of materials, before considering primary supply. The proposals would help to deliver the principles of a circular economy and manage waste more sustainably, than if the waste was sent directly to be disposed of.
- 4.5. National Planning Policy for Waste (published 2014)
- 4.5.1. The National Planning Policy for Waste supplements the NPPF, alongside the Waste Management Plan for England and sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management. Part of achieving this ambition is to drive waste management up the waste hierarchy.
- 4.5.2. The proposed development would contribute to driving waste management up the waste hierarchy, by providing recycling capacity and ensuring that resources are more prudently and sustainably managed, than if they were to otherwise be disposed of.

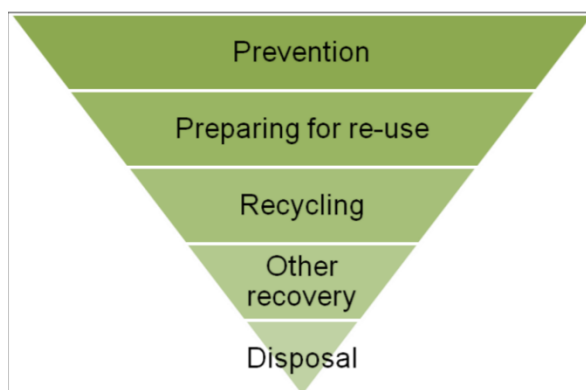


Figure 1 displaying the waste hierarchy (National Planning Policy for Waste, 2014)

4.6. Buckinghamshire County Council Minerals and Waste Local Plan

4.6.1. The Buckinghamshire Minerals and Waste Local Plan (the MWLP) provides the local planning policies pertaining to minerals and waste development in Buckinghamshire, adopted in July 2019 and covering the period 2016-2036. Part of the proposed waste facility, including The Site's access, lies within Buckinghamshire. The most relevant planning policies are assessed below.

4.6.2. Policy 10 relates to waste prevention and minimisation in new development, setting out that proposals for new development should support the efficient use and recovery of resources throughout the life of the development, including construction and operation. As the proposal is for a waste management facility, it would contribute generally to the onward re-use of materials. Where applicable, the proposals would aim to use sustainable options for building materials and would contribute, through its operation, to the implementation of the waste hierarchy.

4.6.3. Policy 11 relates to waste management capacity needs. An assessment of need is provided in 4.4.20 of this Supporting Statement.

4.6.4. Policy 13 relates to the spatial strategy for waste management and aims to focus the development of waste facilities towards primary and secondary

areas of focus. Where sites are located outside of the primary and secondary areas of focus, Policy 13 states that it should be demonstrated why the proposed location is acceptable regarding the spatial strategy for waste management and other relevant MWLP policies.

- 4.6.5. Primary areas of focus for waste development, set out in Policy 13, include existing general industrial and employment areas within the main urban areas of High Wycombe, Aylesbury and Buckingham. Secondary areas of focus include existing general industrial and employment areas in key settlements, particularly involving the re-use of previously developed land and/or the co-location of waste management facilities in key settlements.
- 4.6.6. The Site does not fall within a primary or secondary area of focus for waste management, yet there is flexibility within Policy 13 to demonstrate, on a Site-specific basis, that The Site is an acceptable location for the proposed use, regarding the spatial strategy. Whilst The Site is not designated as general industrial / employment land in a key urban area, it is located upon an active industrial estate and land that has been previously developed.
- 4.6.7. Historically, the Site has been developed in association with Thorney Mill Aggregates Depot, for which it is partially safeguarded. The part of The Site within Hillingdon (the majority of the development plot) also benefits from a certificate of lawful existing use for open storage, demonstrating a more recent previous use of The Site.
- 4.6.8. This Supporting Statement also sets in 4.6.24 that the use of this parcel of the wider industrial site for recycling purposes would not prejudice the effective operation of the safeguarded use. This parcel of land has been partitioned and somewhat excluded from the current industrial estate operations for several years already, with no adverse effect on wider operations.

- 4.6.9. Buckinghamshire Council's pre-application advice set out that other permitted waste uses exist upon the wider industrial complex, meaning the proposed facility would be located upon the same complex as comparable industrial processes.
- 4.6.10. It is reasonable to conclude that the proposals would utilise a currently empty plot of previously developed land, which is recognised as a suitable location, to a certain degree, within the spatial strategy.
- 4.6.11. The National Planning Policy for Waste provides guidance on identifying suitable sites and areas for waste management. In consideration of why the proposed location is a suitable for the proposed development, it is worth highlighting that Paragraph 4 of the National Planning Policy for Waste sets out that waste planning authorities should give priority to the re-use of previously developed land and the co-location of waste management facilities. The Site demonstrates both of these considerations and is therefore deemed, overall, to be a suitable location for the proposed waste use.
- 4.6.12. Policy 14 sets out a range of development principles for waste management facilities within Buckinghamshire, including general compliance with the spatial strategy for waste, the delivery of the waste management capacity requirements and identification of the waste stream and catchment area for the waste received on site, as well as any outputs. A discussion of the spatial strategy for waste and waste capacity is provided above in relation to Policy 13. The Site would accept wastes arising from surrounding urban areas, most likely derived from industrial and commercial premises.
- 4.6.13. Policy 14 reiterates that where the proposal is not located within an area of focus for waste management, preference will be for proposals that integrate

and co-locate waste management facilities or maximise the use of previously developed land.

- 4.6.14. Policy 16 relates to managing impacts on amenity and natural resources. Where relevant, potential impacts on amenity and natural resources resulting from the proposed development are assessed within the supporting studies accompanying the planning application. The Site would also be subject to regulation under the environmental permitting regime, to ensure there is no risk of harm to human health, or the environment.
- 4.6.15. Potential impacts specific to waste development included in Policy 16 include land instability, odour, bio-aerosols, vermin and birds, and litter. Given the nature of the wastes to be accepted, there are unlikely to be any unacceptable adverse impacts regarding these considerations.
- 4.6.16. Policy 17 relates to sustainable transport and requires waste development to be accompanied by a Transport Assessment or Statement. The planning application is accompanied by a Transport Statement, which concludes that the proposed HGV movements would not significantly impact the surrounding highway network.
- 4.6.17. Policy 18 relates to the Natural Environment and sets out that waste development should conserve and enhance natural assets and resources. A PEA has been undertaken to assess the potential impacts of the proposed development on biodiversity, including protected habitats and species and designated sites. The application is further accompanied by a River Morph survey and BNG Assessment, due to The Site's proximity to Bigley Ditch. Table 4 of the PEA sets out the proposed ecological mitigation. The BNG Assessment concludes that The Site falls within the *de minimis* threshold and is exempt from statutory BNG requirements.

- 4.6.18. Policy 19 relates to the historic environment. There are no designated heritage assets upon The Site and The Site is not located within a conservation area. The area of The Site that lies within Hillingdon is within an Archaeological Priority Zone, however, given the previous development of The Site, an assessment is not reasonably considered to be proportionate.
- 4.6.19. Policy 20 relates to Landscape Character. A Landscape and Visual Appraisal has been undertaken as part of the planning application, which sets out that The Site is not considered to be a valued landscape. At a local level, The Site would remain largely consistent with the immediate industrial surroundings and would have a largely negligible visual impact on surrounding visual receptors.
- 4.6.20. Policy 21 pertains to Green Belt and states that the development of waste management facilities in the Green Belt will be supported, where it can be demonstrated that the development would not form inappropriate development and provided that it preserves the openness of and does not conflict with the purpose of including land in the Green Belt. Policy 21 lists that circumstances where waste development may be regarded as not inappropriate development include complete redevelopment of previously developed sites, of which this proposal demonstrates.
- 4.6.21. An assessment of the proposed development against national Green Belt policy is provided in 4.4.5 of this Supporting Statement. The proposed development is not considered to be inappropriate development, as it would comply with paragraph 155 of the NPPF.
- 4.6.22. Policy 23 relates to design and climate change. A Carbon and Energy Statement has been carried out, in relation to the proposed depollution and modular buildings. The design of the proposal takes into consideration the

local context (largely comprising the surrounding industrial complex), alongside relevant safety and security measures. Where applicable and feasible, the proposal would incorporate elements to ensure adaptation to climate change, particularly in relation to the proposed drainage scheme.

- 4.6.23. Policy 24 relates to environmental enhancement and states that proposals for new waste developments must incorporate measures, on and/or off-site, to enhance Buckinghamshire's environmental assets and green infrastructure networks. Recommendations for ecological enhancements are provided within Table 5 of the PEA. The proposed development would, however, be exempt from statutory BNG, as it falls under the *de minimis* exemption.
- 4.6.24. Policy 26 relates to the safeguarding of minerals development and waste management infrastructure. The part of The Site that lies within Buckinghamshire is safeguarded as a Rail Aggregate Depot/ Rail Waste Transfer Station, in association with Thorney Mill Aggregate Depot. This facility is well established to the west of The Site and includes aggregate recycling. Policy 26 states that proposals for other forms of development within a site safeguarded for minerals or waste development will be permitted only in certain circumstances, including where there is no longer a need for the facility in either the vicinity or the wider area as appropriate.
- 4.6.25. The Site is currently an empty plot of land, partitioned from the wider safeguarded facility for several years, whilst only forming a nominal area of the safeguarded land. The safeguarding only covers the part of The Site within Buckinghamshire; a larger area of the actual waste management facility is not safeguarded. This larger area of the proposed waste management facility benefits from a certificate of lawful existing use for open storage.

- 4.6.26. As the proposed use of The Site is for waste management purposes, it would not jeopardise or prejudice the continued use of the wider safeguarded land, particularly as the safeguarding is no longer representative of how the wider industrial complex is set out now and has been set out for up to a decade. In turn, the proposed development is not considered to conflict with Policy 26.
- 4.6.27. Policy 27 relates to minimising land use conflict and states that proposals for new development within 300 metres of minerals and waste development (permitted or allocated) must demonstrate that it would not adversely affect the continued operation of, or prevent or prejudice the use of, the permitted or allocated land use. Policy 27 requires that proposals assess the compatibility and nature of both the proposed development and the minerals and/or waste development, with regard to duration and construction and/or operational phasing, alongside any potentially adverse impacts that may result from the ongoing occupation and usage of the proposed development.
- 4.6.28. For the above-mentioned reasons, the proposed development is not considered to adversely affect the continued operation of, or prevent the use of, the permitted uses pertaining to the wider Thorney Mill Aggregate Depot. The proposed development would be compatible with the associated aggregates development to the west of The Site and potentially adverse environmental impacts are assessed within the relevant supporting studies, which consider existing operations upon the wider complex.
- 4.7. West London Waste Plan
- 4.7.1. The West London Waste Plan (WLWP) sets out the strategy and policies for the sustainable management of waste, up to 2031, covering the six West London Waste Authority Boroughs (including Hillingdon). Part of The Site lies within the

London Borough of Hillingdon. The most relevant policies of the WLWP are assessed below.

4.7.2. Policy WLWP 1 sets out the need for new waste management capacity in the West London Borough's relating to municipal solid waste and commercial and industrial waste, which is to be delivered on allocated sites identified in Policy WLWP 2. Provision over and above the requirements would be encouraged, where this would contribute towards net self-sufficiency. The need for the proposed facility is provided in 4.4.20 of this Supporting Statement.

4.7.3. Policy WLWP 3 sets out the locational criteria for waste development in the West London Boroughs. Waste development outside of existing waste management sites and allocated sites will generally be supported in principle, if the proposals comply with the other WLWP policies, the Development Plan and the following criteria:

- It can be demonstrated that the development cannot be delivered at any available and suitable existing waste management site within the Borough or OPDC area where the development is proposed and sites listed in tables 5-1 and 5-2; and
- For facilities for the management of MSW and C&I waste, identified sites in Tables 5-1 and 5-2 have not come forward and it can be demonstrated there will be a shortfall in waste management capacity required to meet the Boroughs' joint apportionment target; and
- There is no adverse cumulative effect, when taken together with existing waste management facilities, on the well-being of the local community, including any significant adverse impacts against the WLWP sustainability objectives; and

- The proposed site meets the criteria set out in the subsequent WLWP Policies if applicable.

- 4.7.4. There is only one permitted metal and ELV recycling site (B F A Recycling Ltd) identified on the *Mayor of London Waste Map*⁶ within Hillingdon, located along Newyears Green Lane, Harefield. The identified metal and ELV recycling site in Hillingdon is within the northern end of the Borough, approximately 8.5km from The Site. Therefore, locally, there are few permitted metals and ELVs facilities within Hillingdon, with only three specific metals and vehicle recycling facilities across west London, according to the Mayor of London Waste Map.
- 4.7.5. As set out in the need assessment, the proposed development would also replace a metal and ELV recycling facility that is expected to close, as part of the proposed redevelopment of Court Lane Industrial Estate in Buckinghamshire. As such, while the need for the scheme does not hinge on this closure, there is a readily demonstrable commercial need for the development.
- 4.7.6. The proposed waste facility does not neatly fit into one single waste stream, as it is likely to bridge multiple waste streams. The existing waste management sites and allocated sites listed in tables 5-1 and 5-2 are predominately for waste transfer facilities. The proposed development would be a more specialised facility for metals and ELV recycling, whereas the allocated sites are more broadly intended to serve MSW and C&I waste arisings. Therefore, an assessment of the sites in tables Tables 5-1 and 5-2 of the WLWP is not

⁶ which attempts to map permitted waste facilities within London.

considered relevant to the application, given the proposed facility would be for metals and ELV recycling only.

- 4.7.7. The proposed development is not anticipated to result in any significant adverse effects, as assessed by the third-party studies. Specific assessments in relation to noise, air quality, transport, biodiversity, energy, landscape, drainage and flood risk are provided in the relevant supporting studies and where relevant, mitigation measures would be implemented.
- 4.7.8. Policy WLWP 4 relates to ensuring high quality development and sets out a large range of criteria to achieve this, including in relation to amenity, emissions, built form, transportation, drainage, biodiversity and heritage. The proposed development is considered to ensure a high quality of design. As set out, specific assessments in relation to noise, air quality, transport, biodiversity, energy, landscape, drainage and flood risk are provided in the relevant supporting studies.
- 4.7.9. To ensure protection of the environment and human health, The Site would operate under the necessary Environmental Permit, with the proposed operations being subject to the EA's regulatory standards.
- 4.7.10. Policy WLWP 6 relates to sustainable waste management and states that waste management developments will be permitted where a range of criteria can be demonstrated, including that at least 10% of the materials or products used in the construction and operation of the development are re-used or recycled and sourced from within 100km of the site. The proposals would aim to achieve this requirement through the construction operations.
- 4.7.11. Policy WLWP 7 reflects the presumption in favour of sustainable development set out within the NPPF and outlines that Boroughs and OPDC will take a

positive approach and work proactively with applicants to jointly find solutions, which mean that proposals can be approved wherever possible.

4.8. South Bucks District Local Plan

- 4.8.1. The South Bucks District Local Plan was most recently consolidated in 2011 and contains several 'saved' policies relevant to the proposed development.
- 4.8.2. Policy GB1 relates to the Green Belt. An assessment of the proposed development against national Green Belt policy is provided in 4.4.5 of this Supporting Statement.
- 4.8.3. Policy EP3 relates to the use, design and layout of development. The proposed buildings are significantly smaller in scale compared to the existing building to the northwest of The Site and would be of an appropriate scale and massing.
- 4.8.4. Policy TR5 relates to access, highways works and traffic generation. The planning application is accompanied by a Transport Statement, which sets out that the proposed HGV movements would not be expected to significantly impact the surrounding highway network.
- 4.8.5. Policy TR7 relates to parking provision and sets out that development will only be permitted where it complies with the relevant parking standards. The proposals involve the incorporation of three standard parking spaces and one disabled parking space (four spaces in total).
- 4.8.6. Policy TR10 relates to Heavy Goods Vehicles and sets out that development likely to generate heavy goods vehicle trips will only be permitted where this would not adversely affect the character or amenities of nearby properties or the locality in general. In the case of a proposal likely to generate a significant number of HGVs, access would not be onto a residential road or other road, which is not suitable in principle for such traffic.

4.8.7. The proposed development would utilise the existing access to and from Thorney Mill Road. It is expected that a strict HGV routing strategy would ensure there would be no significant adverse impacts on nearby residential areas.

4.9. South Bucks Core Strategy Development Plan Document

4.9.1. The South Bucks Core Strategy Development Plan Document was adopted in February 2011 and contains policies relevant to the proposed development, considered below.

4.9.2. Core Policy 7 relates to accessibility and transport and states that adverse impacts associated with HGV movements in and around Iver Village and Richings Park will be addressed through land use changes. The relevant land use changes are addressed in Core Policy 16. As set out, a strict HGV routing strategy would ensure there would be no significant adverse impacts on nearby residential areas.

4.9.3. Core Policy 16 of the South Bucks Local Plan seeks to address development and redevelopment associated with Court Lane, Thorney Business Park and the Ridgeway Trading Estate. The Site is not located within any of the above-mentioned sites; therefore, Core Policy 16 is not considered to be relevant to this application.

4.9.4. Core Policy 16 does seek to encourage uses that would result in a reduction of HGV movements in proximity to Iver village at Court Lane, Thorney Business Park and the Ridgeway Trading Estate. The locations of the above-mentioned sites are such that HGVs associated with these sites converge onto Thorney Mill South and travel through the village of Iver when travelling north, or towards Richings Way when travelling south.

- 4.9.5. In the wider context of existing HGV movements in proximity to Iver, Paragraph 3.6.25 of the South Bucks Local Plan sets out that *“further consideration needs to be given to the most appropriate form of development on the Aggregate Industries site through the Minerals and Waste Local Development Framework process”*. In turn, it is considered that greater weight should be attributed to relevant policies within the Buckinghamshire Minerals and Waste Local Plan, when addressing land use changes associated with the wider complex upon which The Site is situated.
- 4.10. HGV movements associated with the proposed development would be controlled by condition and subject to a strict routing strategy, meaning that HGVs would not travel north through the village of Iver, via Thorney Lane South or Iver High Street. In turn, HGVs associated with The Site would only travel south of Richings Park, along North Park Road and would avoid the north-south convergence route through Iver.
- 4.11. Buckinghamshire Council’s EIA screening response set out that the proposed HGV movements would not be expected to have a *“significantly adverse impact above existing overall HGV movements”*.



Figure 2 displaying the movement of HGVs through Iver associated with Court Lane, Ridgeway Trading Estate and Thorney Business Park

4.12. The London Plan (2021)

- 4.12.1. The London Plan sets out policies for development across the London Boroughs.
- 4.12.2. There are several policies within the London Plan that set targets for new developments. Policy SI 2 relates to minimising greenhouse gas emissions and sets out that major development should be net-zero carbon, accord with the energy hierarchy. Policy SI 2 also sets out that a minimum on-site reduction of at least 35% beyond Building Regulations is required for major development.
- 4.12.3. The planning application is accompanied by a Carbon and Energy Statement, which discusses the energy requirements relative to the scale of the development proposed. The proposals include three new buildings, comprising a 155 sqm de-pollution building, a 30 sqm modular office cabin and a 16 sqm modular welfare facility. The de-pollution building would not

contain any designated heating or cooling facilities, and the proposed modular buildings are less than 50 sqm, therefore The Site is exempt from the energy efficiency requirements set out in 'Approved Document L, Volume 2: Buildings other than dwellings' relating to the Building Regulations.

4.13. Hillingdon Local Plan Part 1

4.13.1. The Local Plan for the London Borough of Hillingdon sets out Hillingdon Borough Council's future development strategy for the borough and sets out detailed policies to guide planning decisions. Consideration is given to the policies most relevant to The Site.

4.13.2. Policy HE1 relates to heritage and sets out that the Council will conserve and enhance Hillingdon's distinct and varied historic environment, including Archaeological Priority Zones and Areas. The part of The Site within Hillingdon falls just within the boundary of an Archaeological Priority Zone. However, The Site is already made up of hardstanding and has been previously developed. An archaeological assessment is, therefore, not reasonably considered proportionate to this application.

4.13.3. Policy BE1 relates to the Built Environment and sets out a range of design considerations for new development. The proposed development would be of an appropriate scale to the surroundings. An assessment of relevant built design considerations is provided in the Landscape and Visual Appraisal and Carbon and Energy Statement.

4.13.4. Policy EM2 relates to the Green Belt and sets out that any proposals for development in Green Belt will be assessed against national and London Plan policies. An assessment of the proposed development against national Green Belt policy is provided in 4.4.5 of this Supporting Statement.

- 4.13.5. Policy EM3 relates to the Blue-Ribbon Network. An assessment of the potential impacts of the proposed development on biodiversity, including in relation to Bigley Ditch, is provided within the PEA, River Morph Survey and BNG Assessment.
- 4.13.6. Policy EM6 concerns Flood Risk Management, directing development away from Flood Zones 2 and 3, in accordance with the principles of the NPPF and requiring all development across the borough to use sustainable urban drainage systems. A Flood Risk Assessment and Drainage Strategy has been carried out as part of the planning application. The most vulnerable aspect of the development would relate to the element of hazardous waste storage, which would be located outside the area of The Site designated as Flood Zones 2 and 3. The Flood Risk Assessment and Drainage Strategy also sets out that The Site is at very low risk of fluvial flooding, based on hydraulic modelling data provided by the EA.
- 4.13.7. Policy EM7 relates to biodiversity and geological conservation, requiring the conservation and enhancement of the natural state of Colne Valley Regional Park. Policy EM7 also sets out that Sites with Metropolitan and Borough Grade 1 importance will be protected from any adverse impacts and loss. The proposed development would not cause any adverse impacts or loss to the Lower Colne Site of Importance for Nature Conservation.
- 4.13.8. Policy EM8 relates to land, water, air and noise. In relation to water quality, the Council will seek to safeguard and improve both ground and surface water quality. An assessment of the development on surface water quality is provided in the Flood Risk Assessment and Drainage Strategy.
- 4.13.9. Policy EM8 sets out that all major development within the AQMA should demonstrate air quality neutrality, where appropriate, as well as minimise air

quality impacts. Impacts of the proposed development on air quality is provided in the Air Quality Assessment. With reference to best practice guidance, there are unlikely to be any significantly adverse dust impacts. The development is assessed as being air quality neutral, falling below relevant thresholds in relation to building and transport emissions, as set out in the Air Quality Assessment.

- 4.13.10. Policy EM8 further sets out that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated. A Noise Impact Assessment has been undertaken as part of the planning application. The proposed development is not considered to have a significant adverse noise impact and would not require any additional mitigation beyond good practice measures.
- 4.13.11. Policy EM8 also sets out that mitigation strategies are expected for proposals on contaminated land that reduce impacts on surrounding land uses. Should there be any suspected contamination on The Site identified during the proposed operations, a suitable assessment would be carried out.
- 4.13.12. Policy EM8 also sets out that developments must incorporate water recycling and collection facilities, unless it can be demonstrated it is not appropriate. The proposed development would include rainwater harvesting from clean roof-water.
- 4.13.13. Policy EM11 relates to sustainable waste management. The Site would contribute to driving waste management up the waste hierarchy.
- 4.13.14. Policy T1 relates to accessibility and sets out that the Council will steer development to the most appropriate locations, to reduce impacts on the transport network. The planning application is accompanied by a Transport

Statement, which sets out that the proposed HGV movements are not expected to significantly impact the surrounding highway network.

4.14. London Borough of Hillingdon Local Plan part 2

4.14.1. The London Borough of Hillingdon Local Plan part 2 sets out the development management policies for Hillingdon. Consideration is given to those policies most relevant to The Site.

4.14.2. Policy DMHB 7 sets out that the Council will ensure that sites of archaeological interest within designated areas are not disturbed. The Site is on the edge of an Archaeological Priority Zone, however, is previously developed land. An archaeological assessment is not reasonably considered proportionate to the proposed development.

4.14.3. Policy DMEI 2 relates to reducing carbon emissions and sets out that development is required to make the fullest contribution to minimising carbon dioxide emissions in accordance with the London Plan targets. The planning application is accompanied by a Carbon and Energy Statement, which sets out the relevant energy efficiency requirements relating to the proposed buildings.

4.14.4. Policy DMHB 14 relates to trees and landscape. The planning application is accompanied by an Arboricultural Impact Assessment. Measures to protect adjacent trees would be provided within an Arboricultural Method Statement.

4.14.5. Policy DMEI 4 relates to the Green Belt and sets out that inappropriate development in the Green Belt will not be permitted unless there are very exceptional circumstances. An assessment of up-to-date national Green Belt policy is provided in section 4.4.5 of this Supporting Statement.

- 4.14.6. Policy DMEI 7 relates to biodiversity and enhancement. Proposals that result in significant harm to biodiversity which cannot be avoided, mitigated or as a last resort, compensated for, will normally be refused. Where development is constrained and cannot provide high quality biodiversity enhancements on-site, appropriate contributions will be sought to deliver off-site improvements. The proposed development is exempt from statutory BNG requirements, as it falls within the *de minimis* exemption.
- 4.14.7. Policy DMEI 8 relates to waterside development and sets out that development on sites that adjoin a watercourse should not extend within 8 metres of the top of the bank of a main river or 5 metres either side of an ordinary watercourse or an appropriate width, as may be agreed by the Council. The Site is already an existing area of hardstanding upon a wider industrial complex, which has previously been used for open storage. Pollution control measures would be provided through the proposed Drainage Strategy, to safeguard water quality. The proposed operations would also be regulated in accordance with the necessary Environmental Permit from the EA.
- 4.14.8. Policy DMEI 10 relates to the management of flood risk. The Site contains a small area that falls within Flood Zones 2 and 3, along the eastern boundary. A Flood Risk Assessment and Drainage Strategy has been provided as part of the planning application, which sets out that The Site is at very low risk of fluvial flooding.
- 4.14.9. Policy DMEI 11 concerns water management, efficiency and quality and sets out, amongst other factors, that applications for new build developments are required to include a drainage assessment demonstrating appropriate sustainable drainage systems have been incorporated. The planning application is accompanied by a Flood Risk Assessment and Drainage Strategy, which incorporates reasonable sustainable drainage measures.

- 4.14.10. Policy DMEI 17 relates to development of land affected by contamination. Should there be any suspected contamination identified on The Site during the proposed operations, a suitable assessment would be carried out.
- 4.14.11. Policy DMT 1 relates to managing transport impacts and sets out that developments should have no significant adverse transport or associated air quality and noise impacts on the local and wider environment.
- 4.14.12. Policy DMT 2 also sets out that development proposals must ensure safe and efficient vehicular access to the highway network. The planning application is accompanied by a Transport Statement, Air Quality Assessment and Noise Impact Assessment. It is expected that the proposed development would be subject to a HGV routing strategy, to prevent the movement of HGVs through Iver.
- 4.14.13. Policy DMT 6 relates to vehicle parking and sets out that proposals must comply with the parking standards outlined in Appendix C Table 1, to facilitate sustainable development. The proposed development would include three standard parking spaces and one disabled parking space.
- 4.14.14. Policy DMHB 11 relates to the design of new development. The proposed layout of The Site is considered to constitute good design. Relevant aspects of the Site's design are considered in the Landscape and Visual Appraisal and Carbon and Energy Statement accompanying the application.
- 4.15. The Ivers Neighbourhood Development Plan
- 4.15.1. The Ivers Neighbourhood Development Plan was adopted in October 2022, therefore forming part of the Development Plan for The Site.
- 4.15.2. Policy IV9 relates to reducing HGV vehicles and sets out that proposals that would leave to an increase in HGVs that would have an unacceptable impact

on highway safety, or a severe cumulative impact on the road network, will not be supported. A Transport Statement has been carried out as part of the planning application, which sets out that the proposals would not significantly impact the surrounding highway network.

- 4.15.3. Policy IV16 does relate specifically to Link Park Heathrow and Thorney Mill Sidings and sets out a range of criteria where development will be supported, which broadly includes eliminating HGV movements, ensuring no significant harm is caused to the openness of the Green Belt, as well as the inclusion of a Green and Blue Infrastructure Strategy, including but not limited to the retention and enhancement of the woodland on the eastern half of the site.
- 4.15.4. The proposed development only forms a small part of the wider complex that is safeguarded in association with Thorney Mill Aggregate Depot. Whilst the proposed development would involve additional HGV movements, these would be restricted through planning condition/s and would be subject to a strict routing strategy that would prevent the movement of HGVs through the village of Iver. Buckinghamshire Council's EIA screening response set out that the proposed HGV movements would not be expected to have a "*significantly adverse impact above existing overall HGV movements*".
- 4.15.5. An assessment of the proposals against updated national planning policy pertaining to Green Belt is provided in 4.4.5 of this Supporting Statement.
- 4.15.6. Ecological mitigation and recommended enhancements are also provided within the PEA.

5. Conclusion

- 5.1. The proposed development is for a metal and ELV recycling facility, which is intended to replace an existing facility that is expected to close, as a result of the proposed redevelopment of Court Lane Industrial Estate. The proposed development would contribute to the delivery of the waste hierarchy and focus waste management upon a previously developed site within a wider, industrial complex, where there are other permitted waste uses.
- 5.2. The planning application is accompanied by supporting studies that ensure the potential impacts of the proposed development would be suitably mitigated where relevant and would not result in any significant adverse impacts.
- 5.3. The Site is considered to constitute grey belt land and is not considered to be inappropriate development in the Green Belt, given it has been demonstrated that there is a commercial need for the proposed development and the development would be located within a sustainable location.
- 5.4. Whilst The Site is not located within a primary or secondary area of focus for waste management, it does comprise an existing hardstanding area that has previously been developed in association with Thorney Mill Aggregate Depot and is partly covered by a certificate of lawful existing use for open storage. Other permitted waste uses are also located upon the wider industrial complex. Therefore, the proposed development is considered to be an appropriate location for the proposed use.