



**Executive**  
13 December 2010

**Report from the Director of  
Regeneration and Major Projects**

Wards affected:  
ALL

**Brent LDF – Draft West London Waste Plan**

**1.0 Summary**

- 1.1 This report asks the Executive to consider the draft West London Waste Plan which is proposed for public consultation and, in particular, to note the sites proposed for allocation for waste management use within Brent. Executive is asked to agree the draft plan for public consultation.

**2.0 Recommendations**

- 2.1 That Executive notes the views expressed, and recommendation made, by Planning Committee in making a decision on the Waste DPD.
- 2.2 That Executive agrees the draft joint West London Waste Plan for formal public consultation for 6 weeks commencing in mid January 2011.
- 2.2 Notes that approval is also has been, or is being, sought to undertake consultation on the draft West London Waste Plan by five other west London councils, namely Hillingdon, Ealing, Harrow, Hounslow and Richmond upon Thames, as members of the West London Waste Authority partnership.

**3.0 Detail**

**Planning Committee**

- 3.1 Planning Committee considered the report on 21<sup>st</sup> October and, whilst accepting the need to find sites for processing waste within west London, several Members expressed concerns about the distribution of sites across the area and that too much waste processing was likely to be focussed in and around Brent/Ealing, particularly in Park Royal. There were concerns that the concentration of waste facilities would lead to significant environmental impacts in those areas.
- 3.2 It was the Committee's formal recommendation that the consultation document should not be agreed until further consideration to the potential sites, including joint site visits being made with Members of Executive. It is officers' view that, although there may be an imbalance in the location of sites around the sub-region, this is a direct consequence of the spread of potentially appropriate industrial land with good access from the strategic road network and with access to rail or water transport facilities. There are significant amounts of strategic industrial land in Brent and, consequently, much greater opportunity for identifying appropriate sites for waste processing. The methodology for choosing sites, and the reasons behind this imbalance, is explained more fully in paragraphs 3.8 to 3.11 below. It should be emphasised also that the sites are required to deal with the considerable amounts of industrial and commercial waste generated within the area, as well as with municipal waste generated by households. Commercial and industrial waste is generally generated in larger quantities in the larger industrial estates and is appropriately dealt with in the same areas. Executive should be aware also that the other West London Boroughs have agreed the report for public consultation via their Cabinets or Lead Member, but with Hounslow and Harrow still requiring ratification by Full Council.

## **Background**

- 3.1 The Proposed Sites and Policies Consultation Document is the latest stage in the preparation of a joint Waste Development Plan Document (DPD), known as the West London Waste Plan, for the six west London boroughs. It is being prepared jointly by the six West London Waste Authority (WLWA) boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, and Richmond upon Thames – and when completed will form part of the Local Development Framework for each borough.
- 3.2 The purpose of the WLWP is to set out a planning strategy to 2026 for sustainable waste management, deliver national and regional targets for waste recycling, composting and recovery and provide sufficient waste management capacity to manage waste arisings. Planning applications for any new waste management facilities will be considered in the light of the WLWP policies, and they will also be assessed by the relevant council against the individual borough's Local Development Framework, including its local development management policies and any other material considerations.
- 3.3 Municipal solid waste and commercial and industrial waste arisings to be managed to 2026 are identified in the London Plan borough level waste apportionment. In order to accommodate the waste management capacity to manage projected waste arisings, it is anticipated that the land-take required across the six west London boroughs is 56ha under the 2008 London Plan. This requirement has been reduced to a far more realistic figure of 37ha as a result of the Mayor's 'Minor Alteration – waste arisings and apportionments' to the London Plan in December 2009. The draft WLWP contains sufficient contingency to meet the 2008 London Plan requirements, given that the 2008

London Plan is the adopted Plan at this time. However, this contingency will also allow scope for a number of sites to be deleted from the Draft WLWP Proposed Sites and Policies document, should there be valid objections during the consultation stage, and particularly given that the revised London Plan figures will gain more credence following its Examination in Public.

- 3.4 The Draft WLWP Proposed Sites and Policies document seeks to provide sufficient waste management capacity to manage projected waste arisings by safeguarding the capacity of selected existing waste management facilities and identifying opportunities for additional facilities, whilst aiming to ensure that the WLWA boroughs do not manage a disproportionate amount of waste from other London boroughs.

### **Brent Sites**

- 3.5 In Brent, there are two existing waste sites that are considered to be suitable for intensification or re-orientation, i.e. to make a potentially bigger contribution to the management of waste locally. These are the Veolia Depot at Marsh Road, Alperton (1261) and the Twyford waste transfer station (352). There are also four sites that are identified as potential locations suitable for new waste treatment facilities. These are the Hannah Close site in Wembley (144), which was recently granted planning consent for waste management use, part of Twyford Tip also known as Asian Sky site (386), the rail sidings at Premier Park Road, Park Royal and formerly known as Heinz sidings (129) and land at Marsh Road, Alperton adjacent to the Veolia Depot (1262). These sites are shown on the maps at pages 26, 32 and 33 of the draft DPD appended. (NB The site numbers correspond to those in the schedule of sites and the maps in the attached draft Waste Plan.) These sites all scored highly in the site assessment process and, consequently, it is considered that they can be operated for waste management use without significant direct impacts on residential areas.

### **How the Sites Were Chosen**

- 3.6 Initial consultation on a West London Waste Plan Issues and Options report was undertaken between January and February 2009. Comments received have since helped to shape the Draft WLWP Proposed Sites and Policies document.
- 3.7 Members should note that a 'Sustainability Appraisal' was carried out by the consultants Mouchel, in order to ensure that sustainability considerations are taken into account early in the process of policy development. The area of search throughout the six boroughs included an initial list of some 312 sites. The suitability of all these sites was tested by consultants Mouchel in light of the 'Sustainability Appraisal' and against a list of environmental site selection criteria. In addition to this a Habitat Directive Assessment, Equalities Impact Assessment and a Strategic Flood Risk Assessment was also undertaken.

### **Site Selection Criteria and Scoring of Sites**

- 3.8 One of the primary reasons for engaging consultants to undertake the site selection process, apart from providing specific expertise in planning for waste, was to bring an independent assessment to the process. In this way it was hoped that bias towards particular boroughs could be avoided. A methodology that has been applied to other parts of the country, including North and South London, was proposed by the

consultants and, in the main, accepted by the Steering Group of officers and Members. This methodology had a set of criteria which were then scored. The criteria and a long list of sites with their respective scores are included at Appendices 2 and 3.

- 3.9 It can be seen from an examination of the 'long list' that the criteria and scoring resulted in a bias towards sites within the Strategic Industrial Areas such as Park Royal. This also accords with Londonwide policy set out in the London Plan which identifies the Strategic Industrial Sites as being the most appropriate locations for new waste management sites. Brent and Ealing, largely because of the size of the Park Royal industrial estate (it has been described as the largest in western Europe), have more land in Strategic Industrial Areas than the other boroughs in West London. Both Brent and Ealing also have the North Circular Road cutting through the borough, as well as major radial roads. For these reasons it is inevitable that the balance of appropriate sites will be weighted towards the boroughs with a good supply of industrial land. Richmond, for example, has barely any industrial land, and therefore it is generally accepted by the other boroughs in west London that the potential for new waste management sites to be located there is minimal.
- 3.10 The assessment of sites led to a short list of 24 sites, which are the subject of this consultation. A key part of the consultation is to gather the views of major stakeholders, including local residents. The sites are listed in Section 4 of the attached draft plan. Following public consultation, it is anticipated that the revised WLWP Proposed Sites and Policies document will contain fewer sites.
- 3.11 Members are asked to note that the sites chosen for consultation are either adjacent to, or are, existing waste sites, or adjacent to or within existing industrial areas, given that industrial areas must be considered for possible use for waste treatment, as a requirement of the London Plan. No account has yet been taken of the type of process that may be acceptable on each of the proposed sites. This will be a matter for consideration as, and when, planning applications for waste management use are made.

#### Potential for Financial Compensation

- 3.12 Planning Committee of 21<sup>st</sup> October 2010 asked officers to consider the issue of compensation for those Boroughs which have a greater supply of new sites from Boroughs with fewer sites. The first point to bear in mind is that the plan is to deal with all waste streams, not just the municipal waste processed by West London Waste. It would be extremely complex to work out a compensation package dealing with commercial and industrial waste as this is not processed by the waste authority. With regard to municipal waste, this is mainly processed outside of Brent, nearly all of it going to Hillingdon at present, and this has been the case for some considerable time. Given that the sites across West London which currently process waste will continue to do so into the future, albeit potentially by treatment rather than waste transfer, then it is likely that Brent's municipal waste will continue to be processed largely outside of the borough. It is likely that a compensation package of the sort suggested for municipal waste would result in a greater net financial loss to the Borough.

#### Benefits of Designating Sites

- 3.13 There are also some potential benefits in terms of the better planning of the borough in identifying sites for waste management in appropriate locations. On the one hand, having appropriate sites identified in an adopted plan will mean that the Council, as local planning authority, is in a far better position to reject planning applications for less appropriate sites than it would be without the plan. It is officers' experience that requests are being made on a regular basis by commercial operators either seeking sites on which to process waste or proposing waste management sites. Brent Council has only recently granted planning consent for potentially one of the largest waste processing facilities in London at Hannah Close, which will be run by a commercial operator. This was not originally considered by Brent officers to be one of the preferred sites because of its location on the main road access to the Wembley Regeneration Area but, in the absence of identified preferred alternatives in a statutory plan, was not in a position to turn it down. It is considered important, therefore, to develop an effective local policy framework for waste sites for the determination of private planning applications. Also, the identification and subsequent acquisition of sites in preferred locations for waste management will make it considerably easier to relocate existing waste management operators who are not in good locations, should the need arise.

### **Consultation Arrangements**

- 3.14 Consultations on the Draft West London Waste Plan are planned for a six-week period commencing in mid-January. The overall format for the consultations is prescribed by Regulation 27 of The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 and the detailed arrangements will comply with the Council's Statement of Community Involvement, 2006. The six boroughs have agreed that consultation will be undertaken by members of the WLWP Steering Group Committee together with a firm of consultants, CAG, with a programme drawn up which is agreed with their respective corporate communication officers.

## **4.0 Financial Implications**

- 4.1 The costs for undertaking the consultation are estimated at £2,500 per borough and will be met from the existing revenue budget.
- 4.2 Members should note that delays in adoption of the Plan might lead to the Council (and its West London Waste Authority partners) being subject to a number of additional expenses in dealing with its waste in future. For example, by continuing to send waste to landfill, it will be liable to pay landfill taxes (currently £48 per tonne going up to £56 in April 2011) as well as costs associated with transporting waste out of the area in the absence of more local facilities to treat / recycle waste.
- 4.3 For municipal waste Brent pays for the West London Waste Authority in two ways. First, there is a fixed cost for the authority (salaries, etc.) and, additionally, the Council is billed at £90 per tonne for waste to landfill and £40 per tonne for composting.

## **5.0 Legal Implications**

- 5.1 The Council has power to make joint arrangements with other boroughs for the discharge of its functions. The West London Waste Plan will constitute part of the Borough's Local Development Framework. Formally, it will be a Development Plan

Document - further to section 7(c) of the Town and Country Planning (Local Development) (England) Regulations, 2004 - as it will include a site allocation policy for waste management facilities in the borough.

- 5.2 When preparing the West London Waste Plan, the Local Planning Authority must comply with the consultation requirements found both in the Town and Country Planning (Local Development) (England) Regulations 2008 ("the 2008 Regulations") and the 2008 revised Planning Policy Statement 12 (Local Spatial Planning) which sets out government policy on Local Development Frameworks. This includes the duty to consult with specific and general consultation bodies, the requirement to place an advertisement in the newspaper and the general duty to comply with the Council's Statement of Community Involvement.

## **6.0 Diversity Implications**

- 6.1 Full statutory public consultation has been, and will continue to be, carried out in preparing the Waste DPD. An Equalities Impact Assessment of the Waste DPD has also been carried out.

## **7.0 Staffing/Accommodation Implications**

- 7.1 There are no staffing and accommodation implications arising directly from this report.

## **8.0 Environmental Implications**

- 8.1 The Waste DPD may potentially give rise to a significant impact upon the local environment close to waste management sites. However, the identification and use of appropriate sites will mean that the environmental impact is controlled and minimised, particularly upon residential areas, and managing waste locally rather than it being sent to landfill will help mitigate against the effects of climate change. Sustainability appraisal has been undertaken at all stages of developing the Waste DPD.

## **9.0 Background Papers**

London Borough of Brent LDF – Local Development Scheme, March 2009  
Waste DPD, Issues & Options Consultation Report, Sept. 2010  
Brent Core Strategy, 2010  
The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008  
Planning Policy Statement 12, Local Spatial Planning, 2008

### **Contact Officers**

Any person wishing to inspect the above papers should contact Ken Hullock, Planning Service 020 8937 5309

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### **Appendices**

Appendix 1 - West London Waste Plan - Draft Consultation Document  
Appendix 2 - site selection criteria  
Appendix 3 – original long list of sites with scores by borough