

Wards of London Properties Ltd
100 Twyford Abbey Road
Waste Safeguarding Review

REP01

Issue 3 | 30 June 2021

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.




Job number 281628-00

Ove Arup & Partners Ltd
13 Fitzroy Street
London
W1T 4BQ
United Kingdom
www.arup.com

ARUP

Document verification

ARUP

Job title		100 Twyford Abbey Road		Job number	
				281628-00	
Document title		Waste Safeguarding Review		File reference	
Document ref		REP01			
Revision	Date	Filename	20210630 100 Twyford Abbey Road ISSUE 3.docx		
Issue 3	30 Jun 2021	Description	Issue to Client for information		
			Prepared by	Checked by	Approved by
		Name	Munachi Iboko	Rainer Zimmann	Rainer Zimmann
		Signature			
		Filename			
		Description			
			Prepared by	Checked by	Approved by
		Name			
		Signature			
		Filename			
		Description			
			Prepared by	Checked by	Approved by
		Name			
		Signature			
		Filename			
		Description			
			Prepared by	Checked by	Approved by
		Name			
		Signature			

Press Control+Shift+D to insert or

Issue Document verification with document



Contents

	Page
1 Introduction	2
2 Waste recovery facility description	3
2.1 Overview	3
2.2 Waste operations	3
2.3 Waste throughput 2016 to 2020	4
2.4 Land-use intensity factor	5
2.5 Waste facilities	6
3 Waste policy context	8
3.1 Overview	8
3.2 Greater London Authority	8
3.3 Old Oak & Park Royal Development Corporation	9
3.4 West London Waste Plan	11
3.5 100 Twyford Abbey Road	13
4 Waste safeguarding and compensatory provision assessment	15
4.1 Overview	15
4.2 Quantum of compensatory provision	15
4.3 Type of capacity to be re-provided	15
4.4 Location of re-provided capacity	16
4.5 Method of re-providing capacity	17
4.6 Sufficient capacity at other waste sites	17
4.7 Circular economy hub	21
5 Conclusions and recommendations	23
5.1 Safeguarding of waste sites	23
5.2 Compensatory provision	23

Appendices

Appendix A

Environment Agency annual waste throughputs

1 Introduction

This report has been prepared by Ove Arup & Partners Ltd (Arup) on behalf of Ward of London Properties Ltd providing advice on the waste safeguarding of, and potential compensatory provision for, the 100 Twyford Abbey Road site (the Site), which is a waste recovery facility located in Park Royal, London NW10 7XE.

The Site is operated by Bridgemarts Ltd, and trading as Gowing & Pursey with a maximum permitted annual throughput of 350,000 tonnes of commercial, industrial, non-putrescible municipal, and construction and demolition waste.

It is understood that the Site appeared on the Post Submission Modified Draft Local Plan Policies Map of the emerging Old Oak and Park Royal Development Corporation (OPDC) Local Plan (March 2021)¹, as indicated in Figure 1 by the red circle on the map.

In addition, Ward of London Properties Ltd may want to change the use of the Site in the future for non-waste use.

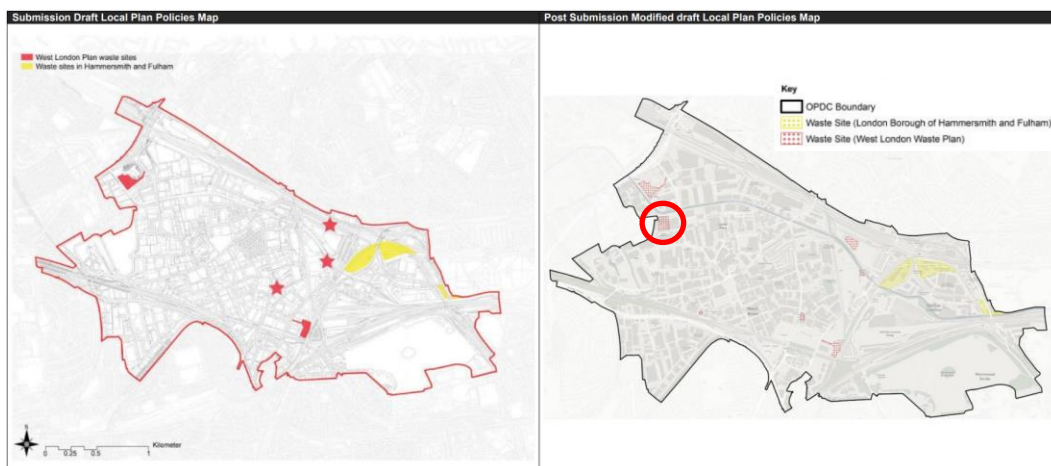


Figure 1: Extract from OPDC Policies Map – Waste sites (Source: OPDC, 2021)

¹ OPDC (March 2021), Table of figure modifications, Post Submission Modified Local Plan, Policies Map – Waste Sites, p18;
https://www.london.gov.uk/sites/default/files/opdc_post_submission_table_of_figure_modifications_march_2021.pdf

2 Waste recovery facility description

2.1 Overview

An application for an 'A11 Household, Commercial and Industrial Waste Transfer Station' (WTS) was made by Bridgemarts Ltd and was determined by the Environment Agency as 'duly made' on 18 October 2013. An environmental permit (EPR/AB3701MU) was subsequently issued by the Environment Agency to Bridgemarts Ltd on 15 January 2014.

2.2 Waste operations

The Site is operated as a waste transfer station receiving predominantly construction, demolition and excavation waste (CDEW). Waste is delivered to the Site in a range of vehicles including skip lorries, roll-on-off vehicles, vans etc for separation and recycling.

The Site is permitted to operate 24 hours and seven days per week. In line with its environmental permit, the activities shall not extend beyond the Site being the land shown edged in green on the site plan (see Figure 2).

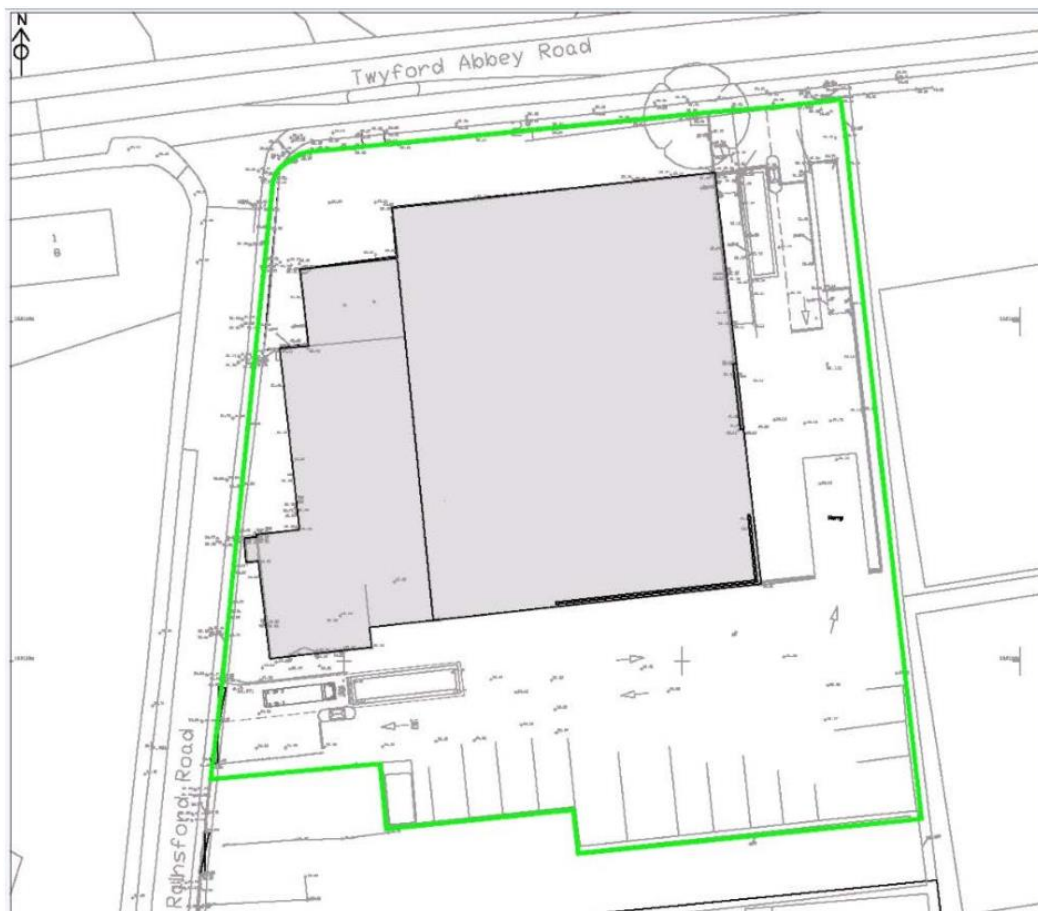


Figure 2: Site layout plan and indicative process

Permitted activities include the following:

- R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).
- D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).
- R3: Recycling/reclamation of organic substances which are not used as solvents.
- R4: Recycling/reclamation of metals and metal compounds.
- R5: Recycling/reclamation of other inorganic compounds.
- D9: Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are disposed of by any of the operations numbered D01 to D12.
- D14: Repackaging prior to submission to any of the operations numbered D01 to D13.

2.3 Waste throughput 2016 to 2020

Annual waste returns for the Site for the most recent five years (2016-2020) were analysed for the waste received at the Site. The annual waste throughput (i.e. waste received) for the Site for the period 2016-2020, have been significantly lower in comparison to its permitted maximum annual capacity of 350,000 tonnes/annum.

The highest annual waste received was in 2016, when 124,610 tonnes of waste was received at the Site (see Figure 3). The largest quantity of waste type received annually has consistently been mixed construction and demolition waste, with an average of 79,826 tonnes/annum, over the five-year period. The highest quantity of mixed construction and demolition wastes was in 2016 when 118,760 tonnes were received.

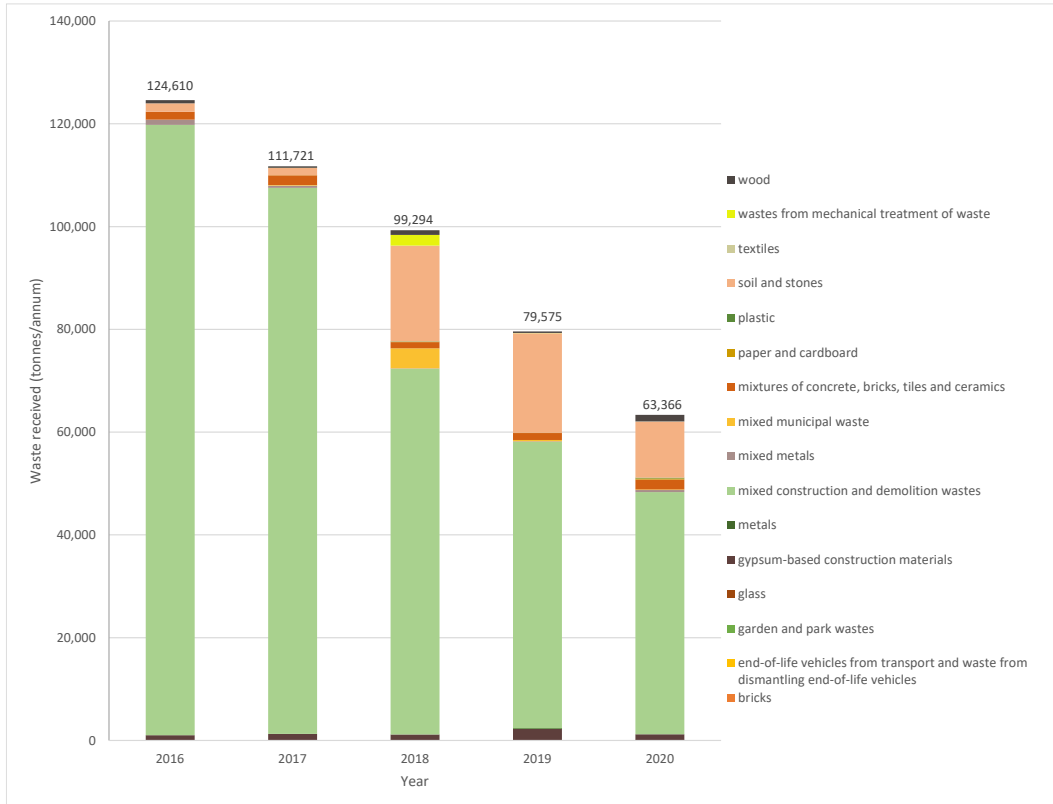


Figure 3: Waste received at the Site, 2016-2020

2.4 Land-use intensity factor

As an indicator of the operational efficiency and maximum waste throughput capacity of the Site, a land-use intensity factor was developed, which is based on six similar skip hire and waste transfer station businesses in London. The average land-use intensity factor of these six comparators is 13.05 tonnes/m² (ranging from 11.3-15.4 tonnes/m²).

At maximum permitted capacity, the land-use intensity factor for the Site would be 35 tonnes/m² (350,000 tonnes / 10,000m² = 35 tonnes/m²). This land-use intensity factor is considered unrealistically high compared to the average land-use intensity factor of the six comparator sites. It is common that environmental permits state a higher permitted capacity for a site than can be achieved in practice.

At the five-year maximum waste throughput of 124,610 tonnes in 2016, the land-use intensity factor is 12.5 tonnes/m². This value is very close to the average land-use intensity factor of the six comparator sites.

The West London Waste Plan (WLWP)² describes at paragraph 4.2.4 an average capacity of 65,000 tonnes/annum per hectare is used to determine what area of land will be required to meet the future capacity gap. This approach equates to a

² West London Waste Authority (July 2015), West London Waste Plan, Adopted Plan; Accessed 23 April 2021, <https://www.brent.gov.uk/media/16402581/west-london-waste-plan.pdf>.

land-use intensity factor of 6.5 tonnes/m² (i.e. 65,000 tonnes / 10,000m² = 6.5 tonnes/m²). This value is closer to the current waste throughput at the Site rather than the 35 tonnes/m² based on the maximum permitted capacity of the Site.

The potential to significantly increase waste throughput at the Site beyond the five-year maximum is considered unlikely as this would require additional waste processing lines to extract and store more recyclables, and circulation area for mobile plant and operatives, which, in turn, would require additional operational space at the Site.

2.5 Waste facilities

A quantitative comparison of the annual waste received at the Site from 2016 to 2020 with the total waste received at other facilities in the OPDC, West London Waste Authority (WLWA) and the Greater London jurisdictions, has provided an indication of the importance of operations at the Site in terms of the local and Greater London planning context.

The comparison was based on the data provided in the Waste Data Interrogator; a database published by the Environment Agency on an annual basis of waste received at and removed from permitted sites. The average results regarding the contribution of the Site to the local and regional waste treatment throughputs (in % by weight) for the period 2016-2019 are shown in Figure 4. The results are split according to geographic scale (Greater London, OPDC and WLWA) and according to facility type (all waste management facilities and comparable facilities). Comparable facilities are defined as those facilities with the A11: Household, Commercial and Industrial WTS permit type.

The geographic area labelled as OPDC – associated London boroughs includes the facilities within the London Borough of Brent, London Borough of Ealing, and the London Borough of Hammersmith and Fulham, all of which have some of their sites within the boundaries of the OPDC area. The geographic area of the WLWA includes the six London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames.

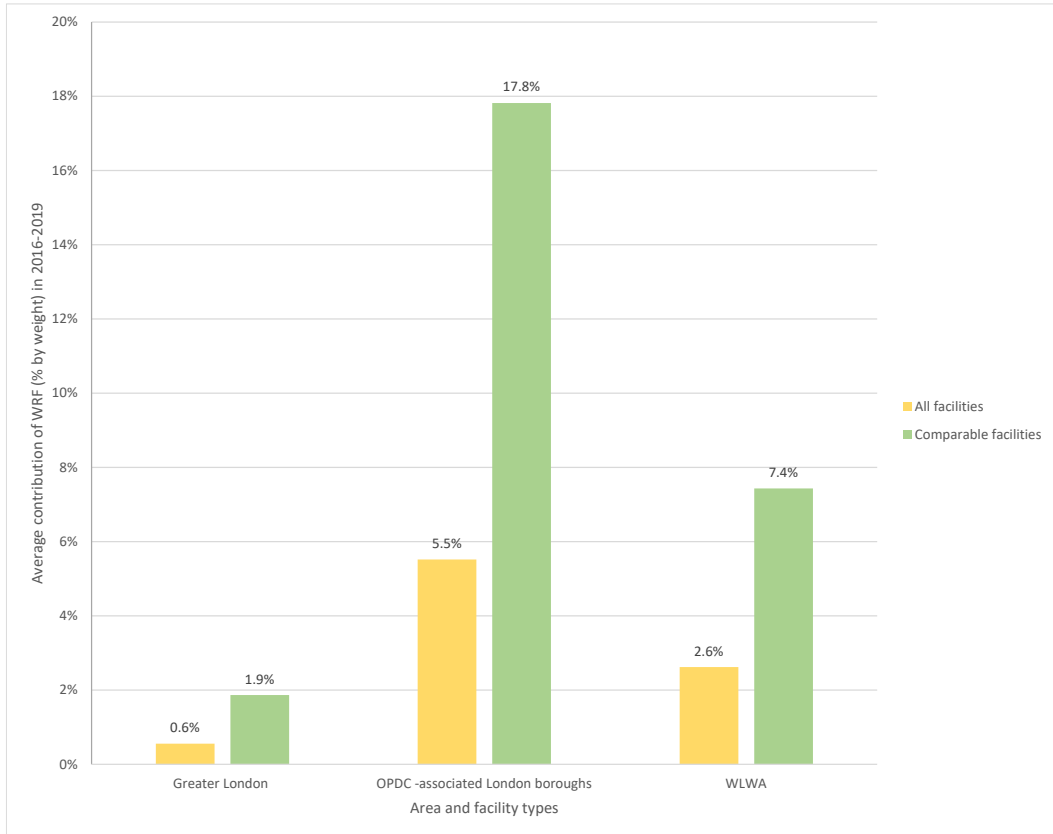


Figure 4: Local and regional significance of the Site, 2016-2019

The results indicate that the contribution of the Site in terms of the annual waste throughput is not significant at the Greater London regional level and sub-regional (waste disposal authority) level. The contribution of the Site is of more significance at the OPDC level, with the Site contributing almost a fifth of the capacity of these types of facilities. However, the level of contribution simply reflects the ‘concentrating effect’ arising from the (smaller) geographical area occupied by the OPDC.

3 Waste policy context

3.1 Overview

Within the London region the development of waste management policy and plans occurs at various levels of local government. Strategic policy and planning are predominately the role of London’s mayoral authorities whilst operational policy and planning is predominately the role of London’s local authorities – as illustrated in Figure 5 and described in further detail below. Those authorities with planning powers are designated (LPA) in Figure 5.



Figure 5: London local government – scope of policy and planning

The role of each tier of London local government in land-use planning for waste management is described in further detail below.

3.2 Greater London Authority

The Greater London Authority (GLA) is responsible for the development and implementation of a spatial development strategy for all of London. This is set out in the London Plan. The London Plan is part of the statutory development plan for London, meaning that the policies in the London Plan should inform decisions on planning applications across London. Boroughs’ Local Plans must be in ‘general conformity’ with the London Plan, ensuring that the planning system for London operates in a joined-up way.

In relation to spatial development and waste management the London Plan apportions London’s waste arisings between the London Boroughs but does not identify waste sites. The allocation of land and the identification of waste sites sufficient to meet the apportionment is the responsibility of London Boroughs. The apportionment made to the London Borough of Brent is 5% of the forecast

waste arisings or 412,000 tonnes at the start of the plan period (2021) rising to 437,000 tonnes at the end of the plan period (2041).

The London Plan also states that existing waste sites should be safeguarded and retained in waste management use (see Policy SI 9 Safeguarded waste sites)³. The London Plan further states that: *“The proposed loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London that must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost.”*

3.3 Old Oak & Park Royal Development Corporation

The OPDC was founded on 1 April 2015 and is the Mayoral Development Corporation responsible for the regeneration of a 650-hectare area of West London. The OPDC development area encapsulates parts of the London Boroughs of Brent, Ealing and Hammersmith & Fulham. The corporation has been granted planning powers and is a local planning authority. As the planning authority for the area, OPDC is responsible for plan making (Local Plan or Development Plan) and the determination of planning applications within its boundary.

However, OPDC is not currently directly responsible for meeting waste needs within its area, instead OPDC has a duty to co-operate with its host boroughs as set out in Paragraph 9.8.8 of the London Plan. This states that: *“**Mayoral Development Corporations (MDCs) must cooperate with host boroughs to meet identified waste needs; this includes boroughs’ apportionment requirements. This could be widened to cover boroughs in the relevant waste planning group where appropriate. In future iterations of the Plan full consideration will be given to apportioning waste needs to MDCs.**”*

This infers that where the host borough is a member of a waste planning group OPDC also has a duty to co-operate with the waste planning group.

Post Submission Modified Draft Local Plan

The Local Plan for the OPDC area has been in development for some time with the latest version being the Post Submission Modified Draft Local Plan⁴.

Waste and its management are referenced in Policy EU6. The policy refers to allocated sites, which we take to mean those sites necessary to meet the apportionment allocated to host boroughs, and existing waste management sites (identified in the most up to date West London Waste Plan). MDCs do not have their own apportionment targets. These sites are shown on the ‘Policies Map –

³ The full requirements of the policies and supporting narrative can be found at https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf.

⁴https://www.london.gov.uk/sites/default/files/opdc_post_submission_modified_draft_local_plan_march_2021.pdf.

Waste sites and ‘Figure 6.7 Existing Waste Sites’⁵, which state that two additional sites were added in Park Royal West including the Site, and a site located in the London Borough of Ealing (OCS Group UK Ltd, Unit 2 & Yard, Sovereign Park, Park Royal Site). The ‘Waste sites’, although referred to as a ‘Policies Map’, simply show the location of waste management sites within the OPDC area.

The supporting text in relation to Policy EU6 makes reference to the West London Waste Plan (see Section 3.5) and states that: *“The WLWP and the safeguarding of these sites provided sufficient capacity to meet the current London Plan (2016) apportionment targets for Brent and Ealing. However, the London Plan (2021) has revised apportionment targets for Brent and Ealing and OPDC will work with the London Boroughs of Brent, Ealing and other waste planning authorities covered by the WLWP to adopt a new WLWP.”*

In relation to the revised apportionment targets the supporting text goes on to say *“...OPDC is obligated to ensure that the apportionment targets of host boroughs can be met as a priority and, therefore, OPDC will continue to work positively with the host boroughs to help demonstrate how any new London Plan apportionment targets would be met, and if necessary, this may trigger a review of this policy and relevant policies in the WLWP.”*

In relation to existing waste management sites the supporting text further states that: *“Waste sites not required to meet the boroughs’ apportionment targets can still help drive improvements and flexibility in achieving self-sufficiency across London. Therefore, in line with London Plan Policy, any existing waste management sites which are proposed for redevelopment will need to be replaced by equivalent or enhanced compensatory provision which can meet the maximum throughput that the lost site could have achieved. Data should be assessed over a three year timeframe to derive the maximum throughput the site could achieve, in accordance with the new draft London Plan. In line with Policy EU6, a sequential approach will also be applied to account for the proximity principle, which requires waste to be managed as close to source as possible. This policy requirement should be discussed with OPDC and the relevant local authority at the earliest opportunity during pre-application discussions.”*

The Policies Map – Waste sites appears to show the location of allocated and existing waste management sites identified in Appendix 2 – Existing Waste Sites in West London of the West London Waste Plan as being located within the OPDC area (and similarly for the London Borough of Hammersmith & Fulham). The ‘box’ and ‘star’ labelling used prior to the OPDC Post Submission Modified Draft Local Plan was likely used to differentiate allocated sites from other waste management sites.

The supporting text to Policy EU6 clearly identifies that the tonnage apportioned to the London Boroughs of Brent and Ealing in the latest London Plan differs from that in the previous London Plan, which was the basis upon which West London Waste Plan (and the waste management provisions of the OPDC Local

⁵ OPDC (March 2021), Table of figures modifications, Post Submission Modified Local Plan, page 18 and page 55; Accessed 23 April 2021, https://www.london.gov.uk/sites/default/files/opdc_post_submission_table_of_figure_modifications_march_2021.pdf.

Plan) was promulgated. There is also reference to the need to prioritise work to ensure the new apportionment targets can be met, although we have found nothing to suggest this work has commenced.

3.4 West London Waste Plan

The WLWP is a joint waste plan for the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond upon Thames and the OPDC, which was adopted in July 2015.

The WLWP identifies eight existing waste sites considered to have particular potential for future waste capacity expansion, including alternative forms of waste management that could result in waste moving up the waste hierarchy. These are the waste sites shown on the location plan (policies map) in Figure 6. Two of the waste sites are located within the London Borough of Brent, with one of these falling within the area administered by OPDC (i.e. Twyford Waste Transfer Station, Abbey Road in Brent). The WLWP also identifies one additional site with opportunity for developing future waste management facilities (i.e. Western International Market, Hayes Road in Hounslow).

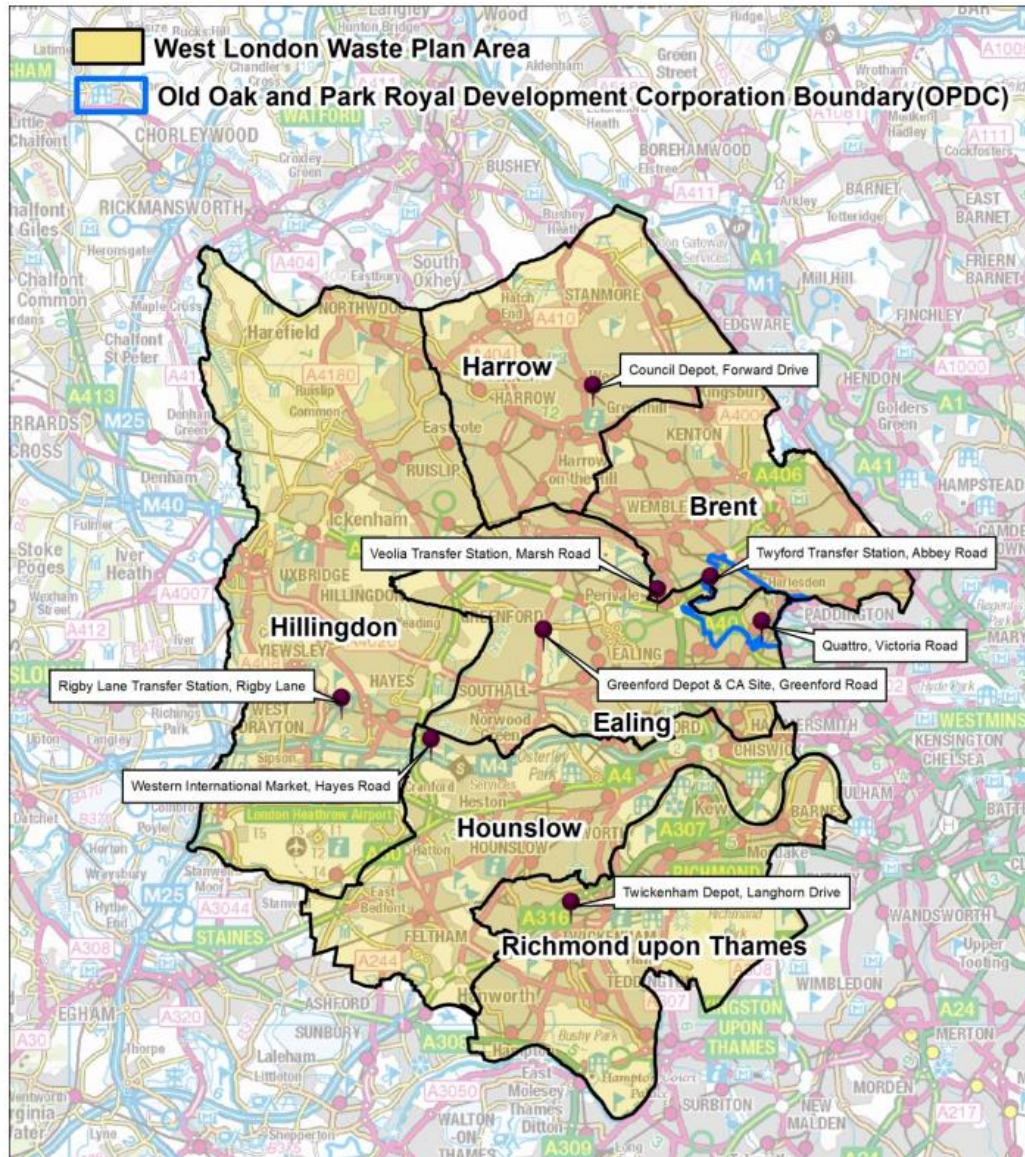


Figure 6: Location plan of allocated waste sites, WLWP

Whilst only those allocated sites with potential for future waste capacity expansion are shown on the location plan (see Figure 6), Appendix 2 to the WLWP contains a full list of all existing waste management sites within the WLWP area. Appendix 2 lists 12 sites in Brent including the Site at 100 Twyford Abbey Road. The Site activity is listed as ‘CDE Waste Processing’⁶. **The Site was not, therefore, counted against the borough-level apportionment, which are for household, commercial and industrial waste.**

All the sites listed in Appendix 2 of the WLWP are safeguarded under Policy WLWP 2 – Safeguarding and Protection of Existing and Allocated Waste Sites, the supporting narrative in paragraph 6.2.1 states: “A list of all the sites that are in existing waste management use in the West London Boroughs and OPDC area can be found in Appendix 2. These safeguarded sites form an essential resource for dealing with all waste streams within the Plan area and protection of these

⁶ CDE refers to Construction, Demolition and Excavation

sites minimises the need for any additional sites, and so they are all safeguarded.”.

Policy WLWP 2 only allows consideration of non-waste uses on existing waste sites if compensatory and equal provision of capacity for waste, in scale and quality, is made elsewhere within the West London Boroughs. This includes the OPDC area within the London Boroughs of Brent and Ealing.

3.5 100 Twyford Abbey Road

The Site operated by Bridgemarts Ltd at 100 Twyford Abbey Road in Brent is identified in the adopted WLWP as an existing waste management site. The provisions for waste management set out in the OPDC Draft Local Plan draw heavily on the WLWP (and the corresponding plan prepared by the London Borough of Hammersmith & Fulham) and it does not identify any waste management sites not already identified in the host boroughs’ local plans.

As part of the OPDC Draft Local Plan development, the ‘Policies Map – Waste sites’ is subject to amendment throughout the plan drafting process. The addition of the Site (along with a second site in the London Borough of Ealing) to the Policies Map in the Post Submission Modified Draft Local Plan is, therefore, valid, as it is identified as an existing waste management site in Appendix 2 of the WLWP and lays within the OPDC area.

It is likely that the inclusion of the Site corrects an oversight, which saw it missed off earlier iterations of the Policies Map.

Although the OPDC Draft Local Plan identifies the need to undertake work to ensure the new apportionment targets can be met there is no evidence OPDC and the London Borough of Brent have undertaken any such work. In our view, this work is unlikely to take place whilst the OPDC Local Plan is still draft and would likely be undertaken in conjunction with the London Borough of Ealing, who also have a changed apportionment and are a ‘co-author’ of the WLWP and one of OPDC’s host boroughs. **The nature of the waste management operations carried out at the Site also make it unlikely that it is required to meet the new apportionment target, given it was not included in the apportionment ‘count’ for the WLWP.**

In our view, the most likely reason for the addition of the Site to the OPDC Policies Map – Waste sites is that it was simply missed off earlier iterations because the source document, Appendix 2 of the WLWP, did not list it (and the site in London Borough of Ealing) as being within the OPDC area.

It is recommended that Bridgemarts Ltd requests that the OPDC Post Submission Modified Draft Local Plan be corrected, which states at paragraph 4.50 that: *“The site is adjacent to the **Twyford Waste and Recycling Centre** which is safeguarded for waste apportionment purposes through the West London Waste Plan 2016 (see Policy EU6). If the **Twyford Waste and Recycling Centre** were redeveloped for a non-waste use then compensatory provision would need to be made in line with the London Plan Policy SI9, WLWP and Local Plan Policy EU6.”*, this should be changed to ‘Twyford Waste Transfer Station’ in paragraph 4.50 to avoid any

potential confusion with the Site due to their close proximity (see Figure 7), and to be consistent with the facility name used in the WLWP.

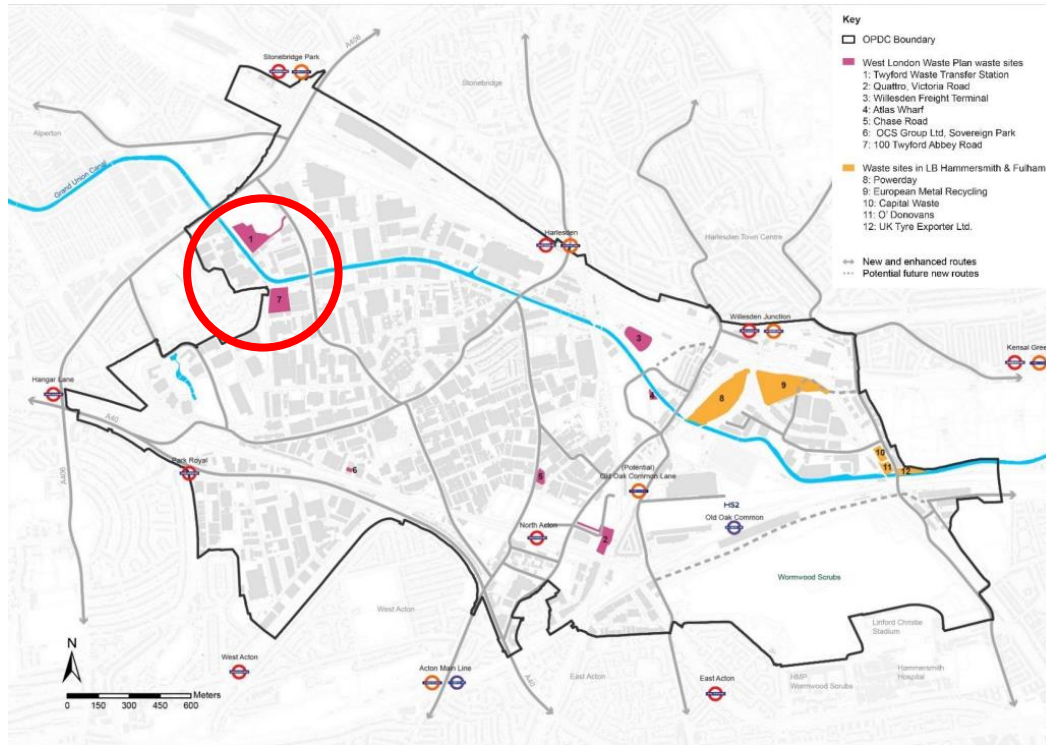


Figure 7: Extract from Post Submission Modified Draft Local Plan, OPDC

4 Waste safeguarding and compensatory provision assessment

4.1 Overview

All the relevant spatial development plans – London Plan 2021, draft OPDC Local Plan and adopted West London Waste Plan – safeguard allocated and existing waste management sites using similar provisions. **(Re)development of waste management sites for non-waste uses is not prohibited by planning policy.** However, planning policy does seek to preserve waste management capacity requiring any capacity lost to other types of development is replaced through compensatory provision.

The plans are generally aligned with regard to the quantum of capacity to be provided. The plans differ as to where compensatory provision should be provided, in line with the Plan Area covered. The London Plan also states that: *“The proposed loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London that must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost.”*. This means, for example, that a loss of recycling capacity cannot be replaced with additional landfill capacity.

The Site is safeguarded by all three tiers of local government within London, with planning powers (see Figure 5). Any proposal for its (re)development for non-waste use will require that compensatory provision is made for the lost waste processing capacity.

4.2 Quantum of compensatory provision

Planning policy recognises that permitted capacity and throughput can be different and does not therefore require like-for-like re-provision of permitted capacity (as specified in planning consents/environmental permits) but rather re-provision of the maximum achievable throughput. The London Plan requires that maximum achievable throughput is assessed over the last five years.

We have, therefore, reviewed the waste returns submitted to the Environment Agency by Bridgemarts Ltd for the years 2016 to 2020 (see Section 2). This data shows that maximum achievable throughput for the site (and the amount of waste processing capacity that would need to be re-provided) is 124,610 tonnes.

4.3 Type of capacity to be re-provided

The site’s environmental permit issued by the Environment Agency allows both recovery and disposal activities on the site. The recovery activities include the recycling/reclamation of prescribed wastes using manual and mechanical techniques and the site returns indicated that most of the waste moving through the site is related to recovery activities. In line with London Plan policy, these

recovery activities are, therefore, likely to be deemed to sit within the ‘Recycling’ tier of the waste hierarchy (see Figure 8).

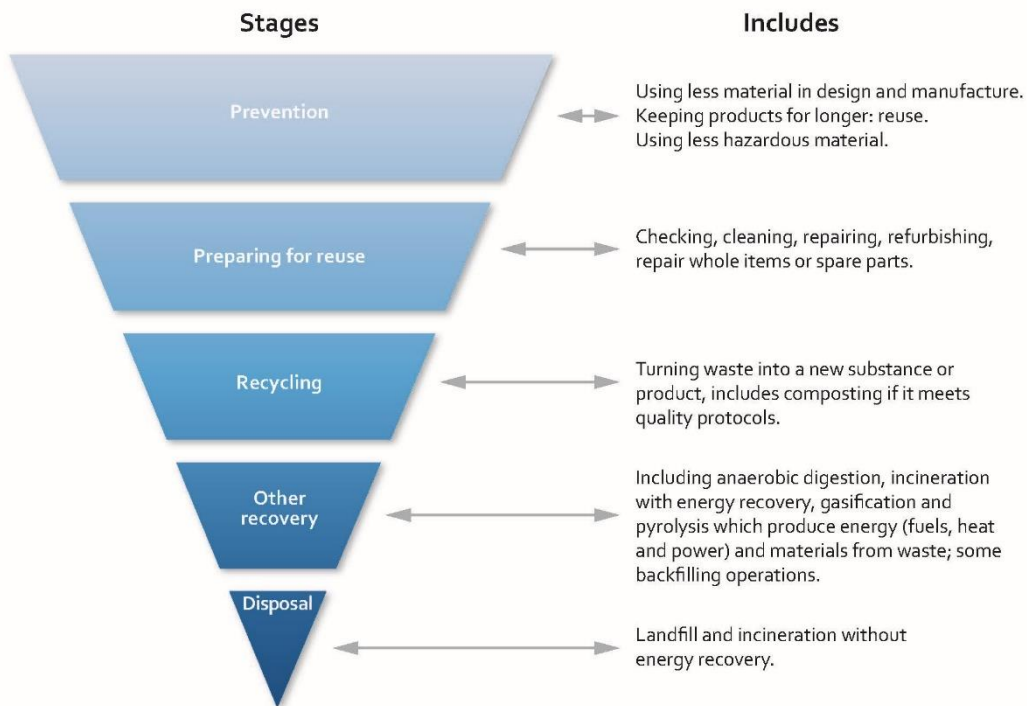


Figure 8: Waste hierarchy

London Plan policy requires the preservation of capacity within each tier of the waste hierarchy. It does not require that preservation of capacity within each tier is on a like-for-like basis as regards waste types. Therefore, it is, at least in principle, possible to replace any future loss of recycling processing capacity at the site with replacement recycling processing capacity for a different set of waste streams.

4.4 Location of re-provided capacity

As the Site is located within the OPDC area we are assuming the requirements of Policy EU6 Waste in the OPDC Draft Local Plan would have precedence over the more general requirement set out in the London Plan, that waste processing capacity is re-provided elsewhere within London.

OPDC policy requirements are that site provision should be made in the most appropriate location in a sequential manner:

- within the OPDC area; or
- within the relevant waste authority area based on where the lost site is; or
- within Greater London.

In this case relevant waste authority area might be interpreted as London Borough of Brent and then the area of the WLWA.

4.5 Method of re-providing capacity

The re-provision of waste processing capacity could be achieved through the construction of a replacement site providing this was located within Greater London or by using the ‘spare’ capacity of existing ‘recycling’ sites within Greater London. In the latter case it would have to be demonstrated that such utilisation would not jeopardise the delivery of apportionment targets for the duration of the plan period (i.e. up to 2041).

The WLWP⁷ references that three other CDEW waste processing and transfer station sites at Atlas Wharf (Ealing within OPDC area), Horn Lane (Ealing), and Civic Way (Hillingdon) are operated by Bridgemarts Ltd. However, it has been established that these other three sites are no longer operated by Bridgemarts Ltd, and as a result, compensatory provision for the 124,610 tonnes of CDEW cannot be directly provided at one of these sites by Bridgemarts Ltd. Therefore, to compensate for the loss of the 124,610 tonnes at the Site, the following options will need to be considered:

- Increasing the waste throughput of existing sites;
- Finding new sites to take up the capacity of the Site;
- Establish that the Site’s existence is not as significant in the local and Greater London region context, as sufficient capacity can be found in other existing sites within the local or regional area.

A land-use change to non-waste use would need to be agreed in consultation with the GLA, OPDC and the London Borough of Brent and be accompanied by the surrender of the site’s environmental permit to the Environment Agency. Acceptance of the permit surrender by the Environment Agency will be subject to the fulfilment of criteria.

4.6 Sufficient capacity at other waste sites

As described in Section 2.5 above, the contribution of the Site in terms of the annual waste throughput is neither significant at the WLWA sub-regional area nor the Greater London regional area.

A detailed analysis of eight waste sites with similar waste management operation to those at the Site was carried out to assess if these sites can provide sufficient capacity to compensate for the loss of the Site. Seven of these waste sites are located within the geographic area of the WLWA (i.e. Suez Recycling Victoria Road; Ron Smith Recycling, St Albans Farm; Quattro, Horn Lane; First Mile, Minerva Road; X-Bert Haulage Ltd, Neasden Goods Yard; Quattro, Southall Lane; and X-Bert Haulage Ltd, Glynn Skips), and one within the North London Waste Authority (NLWA) area in the London Borough of Barnet (i.e. PB Donoghue, Claremont Road). None of the eight ‘allocated sites’ in the WLWP have been included in the detailed analysis undertaken (see Section 3.4).

⁷ West London Waste Plan (July 2015), Adopted Plan, Appendix 2 – Existing Waste Sites in West London (p66-69); Accessed 23 April 2021, [West London Waste Plan \(brent.gov.uk\)](https://www.brent.gov.uk/west-london-waste-plan).

The location of the facilities analysed, and for reference the allocated sites in the WLWP, are shown in Figure 9. All eight waste sites were contacted by phone on 25 June 2021, and the operators confirmed that their facilities are still trading. We were informed that X-Bert Haulage (Glynn Skips) is temporarily closed until July 2021, but will then start operations again.

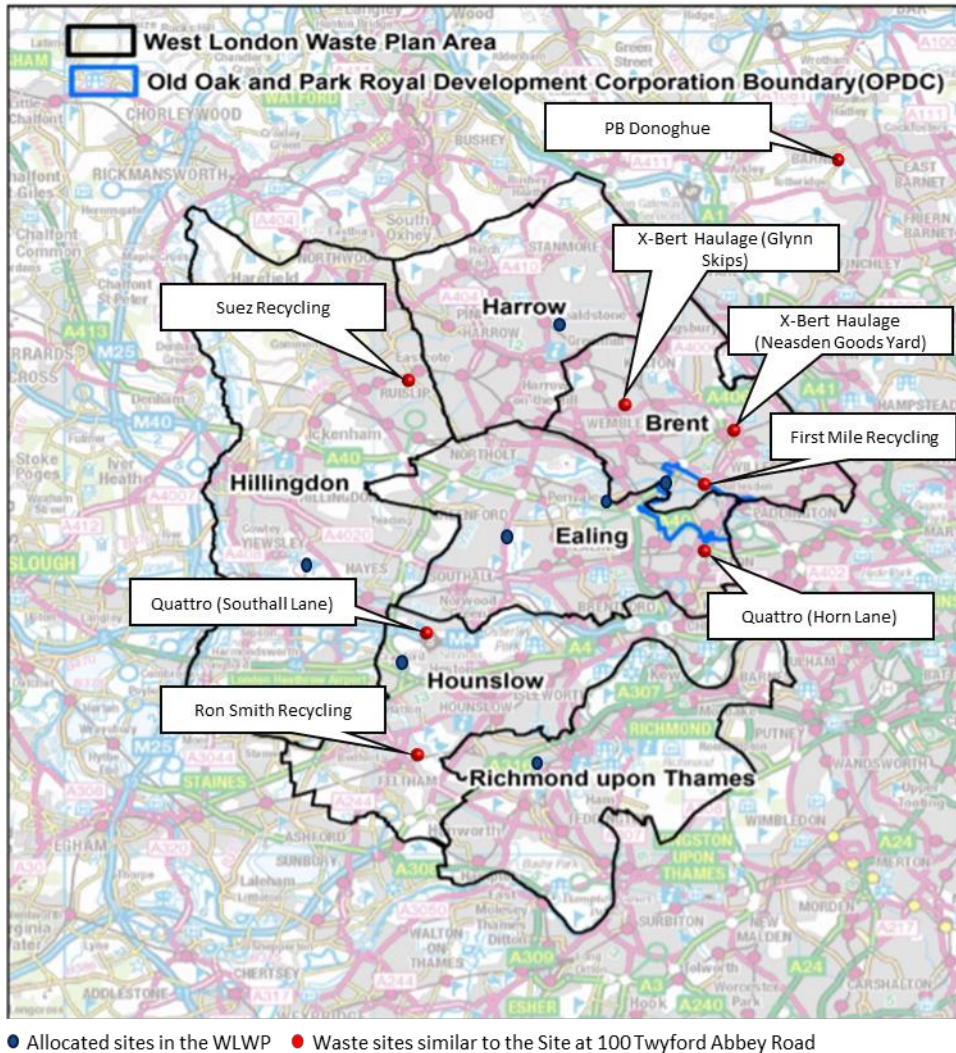


Figure 9: Location of allocated sites and selected waste sites similar to the Site

The additional analysis was based on the Environment Agency environmental permits for each of the eight sites to obtain the maximum permitted annual waste throughput and site plans, as well as Google Earth Pro to measure site areas using the polygon tool. This information is not available from the Waste Data Interrogator database. This data was used to calculate the land-use intensity factor (see Table 1) using the methodology described in Section 2.4. The maximum permitted waste throughput was then adjusted using the average land-use intensity factor of 13 tonnes/m² to determine the ‘adjusted maximum throughput’ to avoid any unrealistically high or low waste throughputs. For example, the adjusted maximum throughput of the Site is: 10,000 m² x 13 tonnes/m² = 130,000 tonnes.

The Waste Data Interrogator annual waste throughputs for each of the eight sites were used to identify the ‘maximum annual waste throughput’. It should be noted

that not all of the eight waste sites have complete data sets for annual waste throughputs (see Appendix A). Hence, adjustments have been based on the maximum available waste throughput over a five-year period. This information was used to calculate the difference between the adjusted maximum throughput and the maximum annual waste throughput, which is a measure of the potential compensatory provision that these eight sites alone can provide.

Overall, the results show that the eight sites analysed have an available capacity of approximately 700,000 tonnes/annum. With three of the eight sites located in the WLWA area alone having the potential to provide capacity of approximately 600,000 tonnes/annum comprising Quattro Southall Lane (131,483 tonnes/annum), Ron Smith Recycling at St Albans Farm (214,798 tonnes/annum) and Suez Recycling at Victoria Road (255,864 tonnes/annum) respectively.

Based on the above analysis, and taking into consideration both the maximum permitted throughput of the Site of 350,000 tonnes/annum, and its adjusted maximum throughput of 130,000 tonnes/annum, **there is sufficient available waste throughput capacity in the WLWA area to compensate for the loss of the Site, as shown in Table 1.**

Table 1: Further analysis of waste sites similar to the Site within the geographic areas of the WLWA and NLWA

Site operator	Local authority/ waste authority area	Maximum permitted throughput (tonnes/annum)	Site area (m ²)	Land-use intensity (tonnes/m ²)	Adjusted maximum throughput* (tonnes/annum)	Difference between adjusted and maximum throughput (tonnes/annum)
Suez Recycling (Victoria Road)	Hillingdon / WLWA	734,984	36,000	20	468,000	255,864
Ron Smith Recycling Ltd (St Albans Farm)	Hounslow / WLWA	166,200	22,000	8	286,000	214,798
Quattro (Horn Lane)	Ealing / WLWA	17,000	2,000	9	26,000	8,574
First Mile Ltd (Minerva Road)	Ealing / WLWA	75,000	6,000	13	78,000	45,013
X-Bert Haulage Ltd (Neasden Goods Yard)	Brent / WLWA	80,000	5,500	15	71,500	19,105
Quattro (Southall Lane)	Hounslow / WLWA	150,000	11,800	13	153,400	131,483
X-Bert Haulage Ltd (Glynn Skips)	Brent / WLWA	349,000	4,000	87	52,000	23,087
PB Donoghue (Claremont Road)	Barnet / NLWA	113,360	9,000	13	117,000	5,774
TOTAL	N/A	1,685,544	96,300	N/A	1,251,900	703,698

Note:

[*] Adjusted maximum permitted throughput is based on an average land-use intensity factor of 13 tonnes/m².

4.7 Circular economy hub

Alternatively, compensatory provision could also be delivered by providing space within a new developed site for establishing a circular economy hub, which would be at, or above, the ‘recycling’ level of the waste hierarchy of the Site. This provides an opportunity to reduce carbon emissions related to waste and creating more employment and social value in the local area responding to the planning policies of the GLA and OPDC, as described below.

The Mayor of London is calling for a global shift to a circular economy to help mitigate the climate emergency by reducing consumption-based carbon emissions, reducing waste and reuse, repair, remanufacture, share and recycle more.⁸ The OPDC Circular and Sharing Economy Study prepared by Arup⁹ promotes the development of new circular focused businesses and technological innovation.

It is vital to create more collaboration spaces for businesses to innovate and share knowledge to drive the transition to a circular economy keeping products and materials at their highest use for as long as possible, which will reduce reliance on using natural resources.

As described in the London Infrastructure Plan 2050¹⁰, the economic benefits of disposing less waste will include savings of up to £5bn, result in new employment opportunities, reduced exposure to volatile global commodity prices and generate less toxic waste. However, this requires investment in alternatives solutions including reuse, repair, and remanufacture facilities.

ReLondon (formerly the London Waste & Recycling Board)¹¹ has been tasked by the Mayor of London to improve waste and resource management and transform London into a leading low carbon circular economy. ReLondon is working with businesses to scale up circular economy solutions and close the circularity gap. One solution is to create more circular economy hubs and clusters in London providing:

- Live-work spaces;
- Reuse, repair and remanufacture facilities;
- Incubation, innovation and co-creation spaces; and
- Education, knowledge sharing and community engagement opportunities.

⁸ London Plan (2021), Policy SI 7 Reducing waste and supporting the circular economy; https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

⁹ OPDC (2017), Circular and Sharing Economy Study; Accessed 17 June 2021, https://www.london.gov.uk/sites/default/files/9_circular_and_sharing_economy_study_0.pdf

¹⁰ Mayor of London (), London Infrastructure Plan 2050; <https://www.london.gov.uk/what-we-do/business-and-economy/better-infrastructure/london-infrastructure-plan-2050>

¹¹ <https://relondon.gov.uk/>

An example of a circular economy hub is Goldfinger¹² located at the foot of the Trellick Tower in West London, which is a social enterprise that creates sustainable ‘Bespoke Furniture’ and homeware from virgin and reclaimed materials (see Figure 10).

The ‘Goldfinger Academy’ is the teaching arm of Goldfinger and offers courses in sustainable woodworking and craft, to educate people of all ages and backgrounds, from curious beginners to aspiring artisans. This includes fee-paying workshops, subsidised community workshops, and an apprenticeship programme for those ‘Not in Education, Employment, or Training’ (NEETs).

Goldfinger is also fighting food waste and social isolation through their charitable initiative, ‘People's Kitchen’. Three Sundays a month, they cook and deliver restaurant-quality meals made from surplus food to vulnerable residents in the local community, supported by dedicated volunteers.



Bespoke furniture



Goldfinger Academy



People's Kitchen

Figure 10: Three main pillars of the Goldfinger social enterprise (Source: Goldfinger)

Establishing a circular economy hub would correspond well with the general industrial character of the area but provide an opportunity for local residence to engage with a new strategic industrial use paradigm based on businesses that can deliver climate positive outcomes and help reduce natural resource consumption.

¹² <https://www.goldfinger.design/>

5 Conclusions and recommendations

5.1 Safeguarding of waste sites

The Site is identified as an existing waste management site in the West London Waste Plan. However, the Site is not counted against the borough-level waste apportionment targets for waste management capacity, which is for households, commercial and industrial waste. To our knowledge, the WLWA has not reviewed the WLWP since its adoption in July 2015.

As an existing waste management site, the Site is safeguarded by planning policy set out in the WLWP, OPDC Draft Local Plan and the London Plan.

In our view, the addition of the Site to the OPDC ‘Policies Map – Waste sites and Figure 6.7 Existing Waste Sites’ in the Post Submission Modified Draft Local Plan is to correct an oversight, which saw it omitted from earlier iterations of the policies map.

It is recommended that Bridgemarts Ltd requests OPDC to correct the reference to the ‘Twyford Waste and Recycling Centre’ in paragraph 4.50 in the Post Submission Modified Draft Local Plan, to ‘Twyford Waste Transfer Station’, to avoid any potential confusion with the Site, and to be consistent with the facility name used in the WLWP.

5.2 Compensatory provision

Development of the Site for non-waste use is not prohibited by planning policy provided there is re-provision of the Site’s waste processing capacity.

Re-provision would consist of 124,610 tonnes per annum of recycling capacity located, in order of preference, in the OPDC area; within the London Borough of Brent; within the area of the WLWA; or within Greater London.

Compensatory provision may need to be provided through the following options – increasing the waste throughput at other sites; finding new sites to take up the capacity of the Site; or by establishing that the Site’s existence is not as significant in the local and Greater London region context, as sufficient capacity can be found in other existing sites within the local or regional area.

The results of the detailed analysis of the eight waste sites, mainly located in the WLWA area, has shown that they can provide waste throughput capacity of approximately 700,000 tonnes/annum. Taking into consideration both the maximum permitted throughput of the Site of 350,000 tonnes/annum, and its adjusted maximum throughput of 130,000 tonnes, there is sufficient waste throughput capacity in the WLWA area to compensate for the loss of the Site.

In addition, alternatively compensatory provision could be delivered by providing space within a new developed site for establishing a circular economy hub, which would be at, or above, the ‘recycling’ level of the waste hierarchy of the Site.

A land-use change to non-waste use of the Site would need to be agreed in consultation with the GLA, OPDC and the London Borough of Brent.

The potential change of land-use of the Site would also require that Bridgemarts Ltd surrenders their environmental permit to the Environment Agency.

Appendix A

Environment Agency annual waste throughputs

A1 Annual waste throughputs for waste sites similar to the Site

Site operator	Maximum permitted capacity (tonnes/annum)	Waste throughput in 2019 (tonnes)	Waste throughput in 2018 (tonnes)	Waste throughput in 2017 (tonnes)	Waste throughput in 2016 (tonnes)
Suez Recycling	734,984	212,136	207,582	197,925	186,477
Ron Smith (Recycling) Ltd	166,200	56,883	42,660	53,419	71,202
Quattro (Horn Lane)	17,000	14,700	17,426	3,733	–
First Mile Ltd	75,000	32,987	26,793	–	–
X-Bert Haulage Ltd (Neasden Goods Yard)	80,000	52,395	14,959	–	–
Quattro (Southall Lane)	150,000	21,917	–	–	–
X-Bert Haulage Ltd (Glynn Skips)	349,000	28,913	24,534	22,050	27,103
PB Donoghue	113,360	–	69,629	94,417	111,226
TOTAL	1,685,544	419,931	403,583	371,544	396,008

Note:

[–] Indicates that the annual waste throughput data was not available from the Environment Agency in the Waste Data Interrogator database.