



Updated West London Waste Plan

Assessment of Existing Waste Sites to be Released

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Document Control

Version No.	Version Description	Date	Changes
1.1	Initial Review	02.09.2025	Addition of site details for Brent.
1.2	LPA Review	03.09.2025	Addition of site details for Hounslow
1.3	LPA Review	07.11.2025	Addition of site details for OPDC Comments
2.0	BPP Review	11.11.2025	Various edits to respond to comments and reflect updated position.
2.1	BPP Review	03.12.2025	Various edits to finalise.

Note to Reader: This report is based on the latest position regarding waste management capacity in the Plan area at the time of finalising (December 2025). Therefore it uses slightly different values for capacity than those set out in the Regulation 18 draft updated WLWP (October/November 2025). For clarity this is intentional and reflects the actual position as set out in the corresponding Capacity Assessment Report (December 2025)

Table of Contents

Executive Summary	1
Introduction and Context	2
London Plan Policy and Supporting Text.....	3
Waste Sites Proposed for Release	5
Unmet Needs of Other London Boroughs	7
Appendix 1: Sites To Be Released Through Updated WLWP.....	9

Table of Tables

<u>Table 1:: Combined apportionment for west London boroughs compared to Estimated Apportionment Capacity in West London minus EWS capacity to be released (tpa)</u>	6
<u>Table 2:: Forecast non-hazardous C& D waste arisings vs assessed non-hazardous C & D waste Management Capacity in west London minus capacity at EWS to be released</u>	7
<u>Table 3:: Comparison between combined west London Borough London Plan 2021 Forecasts of HIC waste arisings (LP Table 9.1) and Apportionments (LP Table 9.2)</u>	8

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Executive Summary

The seven west London local planning authorities (LPAs) are preparing an updated West London Waste Plan (WLWP). This involves assessing current capacity against forecast arisings of different waste streams and the London Plan apportionments, and the identification of possible capacity gaps.

Where capacity gaps are identified the London Plan (Policy SI 8) expects that development plans should:

- allocate sufficient sites,
- identify suitable areas, and
- identify waste management facilities

to at least provide the capacity to manage the apportioned tonnages of household, commercial & industrial (HIC) waste, set out by the London Plan.

The London Plan (para 9.9.2) confirms that the potential release of existing waste sites from safeguarding protection should form part of the development plan-led process (rather than be ad hoc via planning applications).

The Regulation 18 Draft Updated WLWP proposes the release of a small number of existing waste sites identified by the LPAs, on the basis that the plan area will still have sufficient capacity to meet waste needs and their continued safeguarding and use for waste would conflict with wider planning and regeneration objectives for specific areas.

This paper sets out the process by which these sites were assessed demonstrating that their release from safeguarding is justified.

The assessment has been conducted in the context of an existing and projected 'surplus' of existing waste management capacity in the Plan area, above that required to meet apportionments for HIC waste in the London Plan and to manage forecast arisings of construction and demolition (C&D) waste, over the plan period.

Introduction and Context

1. The seven west London local planning authorities (LPAs) are preparing an updated West London Waste Plan (WLWP) in accordance with the London Plan and national planning policy requirements.
2. The London Plan 2021 currently defines existing waste sites as:
 - sites that benefit from permanent planning permission that expressly consents the management of waste, and/or
 - sites subject to an Environmental Permit that permits a waste management activity.

Sites that meet this definition are subject to safeguarding under the provisions of the current London Plan. The 2015 adopted WLWP identified sites in Appendix 2 using this definition and it also identified and allocated certain sites which could support intensification/additional waste capacity in Section 5 and Appendix 6 of the adopted WLWP.

3. The Draft Updated Waste Plan proposes an alternative definition. Existing waste sites are defined as land that:
 - is subject to an extant planning consent for waste use; or
 - for which a Certificate of Lawful Existing Use or Development (CLEUD) for waste use has been granted; or
 - is used for a waste use that has become lawful through the passage of time under planning legislation; or
 - where the waste use is ancillary to a wider lawful use.
4. Such sites may also benefit from an Environmental Permit issued by the Environment Agency for waste-related operations, but such a permit's existence is not considered determinative on the matter of safeguarding as that is properly a land-use planning rather than a pollution control matter. Therefore sites that are only subject to an Environmental Permit for waste use, and do not have a planning permission, a CLEUD, or are not otherwise considered lawful under planning legislation, are not included within this definition.
5. The list of sites for the WLWP area has been reassessed and the release of sites or land currently subject to policy protection for waste management use has been considered as follows:
 - i) Existing waste sites safeguarded through the adopted WLWP (Appendix 2 of the

adopted WLWP) plus other existing waste sites safeguarded under the definition included in the current version of the London Plan (2021) i.e. subject to environmental permits for waste have been reviewed.

- ii) Sites or land identified under Section 5 and Appendix 6 of the adopted WLWP as 'allocated sites' (sites which were assessed as being broadly suitable for development to provide additional waste management capacity), have been reviewed.

This paper also addresses the release of sites from safeguarding status that would qualify as existing waste sites under the revised definition proposed to be applied through the updated WLWP.

London Plan Policy and Supporting Text

6. Prior to considering release of existing waste sites as defined in the current London Plan, the London Plan requires:
 - a. existing waste sites to be safeguarded (Policy SI 8 (A.2), and SI 9); and
 - b. development plans to allocate sufficient sites and identify areas and facilities to manage tonnages of Local Authority, Commercial & Industrial waste (hereinafter referred to as HIC waste) apportioned via the London Plan (SI8 (B.3&4)).
7. Policy SI 9 (C) of the London Plan (2021) requires that, if an existing waste site is to be redeveloped for another use, appropriate compensatory capacity be 'made' within London that is at, or above, the same level on the hierarchy and at least meet, and (ideally) exceed, the maximum achievable throughput of the site to be lost (SI 9 C).

8. London Plan Para 9.9.2 elaborates on Policy SI 9 stating:

Any proposed release of current waste sites or those identified for future waste management capacity should be part of a plan-led process, rather than done on an ad-hoc basis. Waste sites should only be released to other land uses where waste processing capacity is re-provided elsewhere within London, based on the maximum achievable throughput of the site proposed to be lost. (emphasis added).

9. It goes on to state that for the purposes of assessing capacity to be replaced:
When assessing the throughput of a site, the maximum throughput achieved over the last five years should be used; where this is not available potential capacity of the site should be appropriately assessed.

10. Paragraph 9.9.2 appears to conflate two separate issues: The first sentence applies to release of an existing waste site through the development plan production process, including the emerging WLWP. The subsequent sentence relates to the requirements on applications for change of use through development management decisions and implies that there can be no net loss of capacity.
11. Paragraph 9.9.3 is also directly applicable:
*Policy SI 8 Waste capacity and net waste self-sufficiency promotes **capacity increases at waste sites** where appropriate to maximise their use. If such increases are implemented over the Plan period, it may be possible to justify the release of waste sites if it can be demonstrated that there is sufficient capacity available elsewhere in London at appropriate sites over the Plan period to meet apportionment and that the target of achieving net self-sufficiency is not compromised. In such cases, sites could be released for other land uses. (emphasis added)*
12. It therefore follows that not only intensification at existing waste sites (through optimisation as promoted by Policy SI 8A.3), but capacity that has become lawful under land-use planning through gaining planning consent or becoming lawful over time or as a waste use ancillary to a wider lawful use since Appendix 2 of the adopted WLWP was published, ought also to be counted towards compensatory capacity to allow release of certain EWS. Ultimately, whether release can occur also depends on whether it can be demonstrated that the HIC waste apportionments will still be met and net self-sufficiency for London as a whole is not compromised (as per Para 9.9.3 above).
13. The proposed release of the existing waste sites that would otherwise be safeguarded through the updated WLWP is consistent with advice in the London Plan, that existing safeguarded sites ought to be released as "*part of a plan-led process rather than done on an ad hoc basis*" (Para 9.9.2). This document is published alongside the Regulation 18 Draft Updated WLWP and views from stakeholders, including on the proposed release of sites, are invited during the public consultation.

Existing Waste Sites Proposed for Release

14. As part of the assessment under para 5 above, six existing waste sites are proposed to be released from safeguarding through the updated WLWP. The identification of each site has been undertaken with consistent consideration given to the factors set out below. The rationale for the proposed release of each of these is set out in the site profiles included in Appendix 1.
15. Potential conflict with Local Plan policy has been identified as the key justification when considering the release from safeguarding of specific existing waste sites. Such tensions primarily arise when an existing waste site (EWS) is located on land identified/allocated in a local plan for a non-waste use, particularly within a regeneration area, and a non-waste use developed in that location may be incompatible with the continued waste use.
16. The London Plan states the following in connection with such tensions:

Policy SI 9 Safeguarded waste sites

...B Waste facilities located in areas identified for non-waste related development should be integrated with other uses as a first principle where they deliver clear local benefits.

The above text indicates that while there is a presumption towards integration of the waste use as the starting position, i.e. first principle, it only applies where the waste use delivers "clear local benefits". Hence, where such uses do not deliver benefits specific to the locality, then integration is not an expectation. Similarly, even where there may be some demonstrable benefits to the locality, if these are outweighed by disbenefits to delivery of the proposed development, then the requirement for the benefits to be "clear" may not be met (noting that overall the local need is forecast to be met through capacity to be retained and protected through safeguarding – see Updated Waste Management Capacity Assessment below).

17. Other supplementary information, which helps to characterise the sites proposed for release has been gathered as far as possible.

Updated Waste Management Capacity Assessment

18. The updated Waste Management Capacity Assessment produced in 2025¹ forms part of the evidence base for the Regulation 18 Draft Updated WLWP. The updated assessment identifies 'surpluses' in capacity (i.e. capacity in excess of the West London Borough combined HIC waste apportionments identified in the London Plan (LP) and C & D waste management needs – the 'identified capacity') as follows:
- HIC waste (to which London Plan apportionments relate) between 0.71 million tpa in 2021 falling to 0.58 million tpa in 2041 (decline in surplus due to rising apportionment);
 - Construction & Demolition² waste : 1.19 million tpa in 2021 falling to 1.006 million tpa to 2041 (surplus falling at 2031 due to temporary permissions expiring and rising growth forecast).
19. When the quantum of capacity provided by the existing waste sites proposed to be released is deducted from the assessed capacity, a large surplus still remains as shown in Tables 1 and 2, and therefore there is no apparent need to identify land for allocation and/or specific sites for intensification.

Table 1: Combined apportionment for West London boroughs compared to assessed HIC waste qualifying capacity in West London minus capacity of EWS to be released (tpa)

	2021/25	2041
Combined Apportionment	2,092,000	2,221,000
Assessed Capacity	2,883,641	2,883,641
Difference - Surplus Capacity	+791,641	+622,641
Minus Release of Selected EWS	-18,646	
Remaining Capacity 'Surplus'	+772,995	+603,995
Surplus as % of Apportionment	+37% headroom	+27% headroom

¹ *West London Capacity Assessment Regulation 18 Consultation Update*, BPP Consulting December 2025

² C&D waste only as excavation waste falls outside London Plan objective of achieving net self sufficiency in provision of management capacity in London as a whole by 2026.

Table 2: Forecast non-hazardous C & D waste arisings vs assessed non-hazardous C & D waste Management capacity minus capacity of EWS to be released (tpa)

	2026	2031	2036	2041
Forecast Arisings	1,185,095	1,263,067	1,302,067	1,342,272
Assessed Capacity	2,623,354	2,518,308	2,518,308	2,518,308
Difference - Capacity Surplus	+1,438,259	+1,255,241	+1,216,241	+1,176,036
Minus Release of Selected EWS	-209,359			
Remaining Capacity 'Surplus'	+1,228,900	+1,045,882	+1,006,882	+966,677
Surplus as % of Forecast	+104%	+83%	+77%	72%

20. The findings of the most recent Waste Management Capacity Assessment demonstrates there is currently sufficient suitable capacity to provide for the tonnage of HIC waste apportioned to the west London Boroughs to provide for and for the management targets for Construction & Demolition waste set out in the London Plan 2021 to be met. As such it is considered that the plan area does not need to include 'allocated sites' to provide additional capacity to meet the future needs of the plan area, and therefore the 'allocated sites' included in the adopted 2015 WLWP do not need to be carried forward into the Updated WLWP.
21. As detailed in the Existing Waste Sites Proposed for Release section above, where waste sites are located in places identified/allocated in a local plan for non-waste use, particularly within a regeneration area, and a non-waste use developed in that location may be incompatible with an 'integrated' waste use (as per London Plan SI 9, B), these sites may be considered for release where this would not negatively impact the ability to meet the London Plan apportionments which go above and beyond the forecast needs of the Plan area (see Table 3), and any other waste needs identified in the Plan area. The latest Waste Management Capacity Assessment confirms there is sufficient capacity to enable release of a number of waste sites that are part of much larger regeneration schemes without these objectives being put at risk.

Unmet Needs of Other London Boroughs

As shown in Tables 1 and 2 above, the latest Waste Management Capacity Assessment indicates that, even following release of the identified existing waste sites, there is still projected 'surplus' capacity over the Plan period.

22. The London Plan states:
- 'Boroughs with a surplus of waste sites should offer to share these sites with those boroughs facing a shortfall in capacity before considering site release.'* (Para 9.8.6)
- and,
- 'It may not always be possible for boroughs to meet their apportionment within their boundaries and in such circumstances boroughs will need to agree the transfer of apportioned waste.'* (Para 9.8.7)

23. The London Plan apportionments already take into account the ability of individual boroughs to manage quantities of HIC waste equivalent to that predicted to arise in each of their own areas. The apportionments reflect a range of factors, and in the case of the west London Boroughs, some 'unmet need' identified as arising from outside of the WLWP area has been factored into the determination of their apportionments. This is evidenced by the fact that the combined west London apportionments exceed the London Plan forecast of HIC waste arisings for west London by an additional c40% (see Table 3 below).

Table 3: Comparison between combined west London Borough London Plan 2021 Forecasts of HIC waste arisings (LP Table 9.1) and Apportionments (LP Table 9.2)

	2021	2041
LP forecast HIC waste arisings in west London (tonnes)	1,524,000	1,615,000
LP HIC waste apportionments (tonnes)	2,092,000	2,221,000
Difference (tonnes)	+568,000	+606,000
Additional % difference apportionment represents on west London arisings forecast	37.27%	37.52%

Some London boroughs with a deficit of capacity may seek to rely on surplus capacity in west London principally when planning for the management of the HIC waste apportioned to them by the London Plan. The extent to which other Boroughs may be seeking to rely on west London having a capacity surplus is currently unknown.

24. All London Boroughs will be invited to submit representations through the formal consultation on the Regulation 18 Draft Updated WLWP. In any event, if the updated WLWP is to plan on the basis of meeting other Boroughs' requirements beyond its own, then for the Plan to be sound, this must be based on robust evidence. Therefore, any Borough seeking to share in surplus capacity available in west London will be expected to demonstrate amongst other matters, that all other avenues of making provision within their respective Plan areas have been exhausted before such an arrangement might be entered into.

Appendix 1: Sites Proposed to Be Released Through Updated WLWP

LPA	Site Name	Purpose of Release/ Proposed Use	Assessed Capacity			Waste Related Planning Status
			Apportioned Waste	CDEW	Hazardous	
Hounslow	Unit 8 Initial Washrooms (Brentford) Service Centre, Amalgamated Drive, West Cross Ind Park, Brentford, TW8 9EZ	This is within an emerging site allocation 5 - West Cross Campus in the Hounslow Local Plan	2,156	0	1,094	CLEUD for medical waste transfer granted 17.04.2007
OPDC	Atlas Wharf, Atlas Road, Park Royal, London, NW10 6DN	Within Channel Gate Place Policy (P9) and within site allocation 26 (Channel Gate)	0	65,382	0	None
	Quattro, Victoria Road	Within North Acton and Acton Wells Place Policy (P7) and within site allocation 11 (Acton Wells East).	0	0	0	Covered under deemed consent as part of HS2 construction. Previous to this, permanent consent was granted in 2001 on appeal for continued use of premises as waste transfer station (ref P/2000/0570).
Brent	Mitre Works, Neasden Lane (European Metal Recycling Limited)	Adopted Local Plan site allocation BEGA1 'Neasden Stations Growth Area' and adopted Neasden Stations Growth Area Masterplan SPD	16,490	0	0	Permanent Permission for metal-recycling
	Land at Neasden Goods Yard (X-Bert Haulage)		0	60,254	0	Permanent Permission for waste transfer
	Unit 6 Neasden Goods Yard (X-Bert Haulage)		0	83,722	0	Permanent Permission for waste transfer
Totals			18,646	209,359	1,094	

Site Name	Initial Washrooms	Site Ref:	HO12	
Borough/LPA	Hounslow			
Site Area (hectares)	c.0.135ha			
OS Grid Reference	TQ1660477743			
Site Address	Unit 8 Initial Washrooms (Brentford) Service Centre, Amalgamated Drive, West Cross Ind Park, Brentford, TW8 9EZ			
Site Location/Setting	West Cross Industrial Park			
Planning Status	CLEUD for medical waste transfer granted			
Status in Adopted Local Plan	Site not allocated in Local Plan (2015)			
Proposed Status in emerging Local Plan	Site is part of emerging Site Allocation 5 - West Cross Campus within the Hounslow Local Plan 2020-2041 (examination stage)			
Status in adopted WLWP	Safeguarded for 2,014tpa of apportioned waste			
Current Permitted Use	Waste Transfer			
Waste Type Inputs	Hhold/Ind/Com			
	HIC	CDEW	Other	
5 year peak (tpa)	2,156	0	1,094	
Historic peak (if different)	6,184	0	0	
Maximum permitted capacity (tpa)	4,999	0	0	
Justification for Release				
Justification:	Emerging Site Allocation 5 (West Cross Campus) is allocated for a mixed-use scheme comprising industrial and other employment uses (min 55,079sq m) co-located with 1,800 homes. Site will also be required to demonstrate that it will deliver the new Golden Mile station.			

Site Name	Atlas Wharf (Space Rubbish Ltd)	Site Ref:	E10
Borough/LPA	Ealing/OPDC		
Site Area (hectares)	0.93		
OS Grid Reference	TQ2139082656		
Site Address	Atlas Road, Park Royal, London, NW10 6DN		
Site Location/Setting	Old Oak and Park Royal Opportunity Area. Part of Local Plan site allocation for residential led, mixed use as part of a new major town centre.		
Planning Status	None		
Status in Adopted Local Plan	. Within Channel Gate Place Policy (P9) and within site allocation 26 (Channel Gate) with targets for 3,100 homes and min. of 10,700 commercial or industrial floorspace.		
Proposed Status in emerging Local Plan	N/A		
Status in adopted WLWP	Safeguarded for CDEW (as Bridgemarts t/a Gowing & Pursey)		
Current Permitted Use	Waste Transfer		
Waste Type Inputs	CDEW		
	HIC	CDEW	Other
5 year peak (tpa)	0	65,382	0
Historic peak (if different)	As above		
Maximum permitted capacity (tpa)	100,000		
Justification for Release			
Justification:	Site allocation 26 (Channel Gate) is allocated for 3,100 homes and min. of 10,700 commercial or industrial floorspace).		

Site Name	Quattro	Site Ref:	E21
Borough/LPA	Ealing/OPDC		
Site Area (hectares)	0.7		
OS Grid Reference	TQ2112181950		
Site Address	Victoria Road, Park Royal		
Site Location/Setting	Old Oak and Park Royal Opportunity Area. Part of Local Plan site allocation for residential led, mixed use as part of a new major town centre.		
Planning Status	Covered under deemed consent as part of HS2 construction. As per commentary in 2015 WLWP, previous to this, permanent consent was granted in 2001 on appeal for continued use of premises as waste transfer station (ref P/2000/0570).		
Status in Adopted Local Plan	Within North Acton and Acton Wells Place Policy (P7) and within site allocation 11 (Acton Wells East) with targets for 1,650 homes and min. of 8,000 commercial or industrial floorspace.		
Proposed Status in emerging Local Plan	N/A		
Status in adopted WLWP	Allocated and safeguarded. Nominal potential throughput for HIC waste was 45,500 tpa (based on 65,000 per hectare).		
Current Permitted Use	Being used as part of HS2 construction site.		
Waste Type Inputs	N/A		
	HIC	CDEW	Other
5 year peak (tpa)	0	0	0
Historic peak (if different)	147,597 tpa CDEW		
Maximum permitted capacity (tpa)	n/a		
Justification for Release			
Justification:	Site is no longer operational and is within North Acton and Acton Wells Place Policy (P7) and within site allocation 11 (Acton Wells East) with targets for 1,650 homes and min. of 8,000 commercial or industrial floorspace.		

Site Name	Mitre Works (European Metal Recycling Limited)	Site Ref:	B11
Borough/LPA	Brent		
Site Area (hectares)	c.0.59 hectares		
OS Grid Reference	TQ2142085249		
Site Address	Neasden Lane Dudden Hill, Dollis Hill, NW10 2UJ		
Site Location/Setting	Neasden Stations Growth Area		
Planning Status	<p>Planning permission 05/3597 for extension of existing metal-recycling facilities.</p> <p>Live planning application for comprehensive mixed-use redevelopment (23/3462) across sites B11, B03 and B09 proposing 1,151 homes, 604 student bedspaces and industrial, commercial and community use floorspace.</p>		
Status in Adopted Local Plan	<p>Within site allocation BEGA1 'Neasden Stations Growth Area' and covered by adopted Neasden Stations Growth Area Masterplan SPD – part of wider area envisaged for comprehensive redevelopment including industrial intensification, new passenger railway line infrastructure and residential development.</p>		
Proposed Status in emerging Local Plan	No current emerging Local Plan		
Status in adopted WLWP	Safeguarded as providing 56,624 tpa apportionment capacity		
Current Permitted Use	Formerly Metal Recycling.		
Waste Type Inputs	HIC		
	HIC	CDEW	Other
5 year peak (tpa)	16,490	0	0
Historic peak (if different)	As above		
Maximum permitted capacity (tpa)	86,000		
Justification for Release			
Justification:	<p>Within adopted Local Plan site allocation BEGA1 'Neasden Stations Growth Area' and covered by adopted Neasden Stations Growth Area Masterplan SPD</p>		

Site Name	Land at Neasden Goods Yard (X Bert Haulage)	Site Ref:	B03
Borough/LPA	Brent		
Site Area (hectares)	c.0.64 hectares		
OS Grid Reference	TQ2140685326		
Site Address	Neasden Close, Dudden Hill,, Dollis Hill, NW10 1PJ		
Site Location/Setting	Neasden Stations Growth Area		
Planning Status	<p>Planning permission 01/2193 for retention of waste-transfer station enclosure and continued use of enclosed area for waste transfer purposes.</p> <p>Live planning application for comprehensive mixed-use redevelopment (23/3462) across sites B11, B03 and B09 proposing 1,151 homes, 604 student bedspaces and industrial, commercial and community use floorspace.</p>		
Status in Adopted Local Plan	<p>Within site allocation BEGA1 'Neasden Stations Growth Area' and covered by adopted Neasden Stations Growth Area Masterplan SPD – part of wider area envisaged for comprehensive redevelopment including industrial intensification, new passenger railway line infrastructure and residential development.</p>		
Proposed Status in emerging Local Plan	No current emerging Local Plan		
Status in adopted WLWP	Safeguarded as providing 62,260 tpa CDEW capacity		
Current Permitted Use	Waste Transfer		
Waste Type Inputs	CDEW		
	HIC	CDEW	Other
5 year peak (tpa)	0	60,254	0
Historic peak (if different)	As above		
Maximum permitted capacity (tpa)	n/a		
Justification for Release			
Justification:	<p>Within adopted Local Plan site allocation BEGA1 'Neasden Stations Growth Area' and covered by adopted Neasden Stations Growth Area Masterplan SPD</p>		

Site Name	Unit 6 Neasden Goods Yard (X Bert Haulage formerly ACE Waste)	Site Ref:	B09
Borough/LPA	Brent		
Site Area (hectares)	c.0.39 hectares		
OS Grid Reference	TQ2145385178		
Site Address	Neasden Close, Dudden Hill, Dollis Hill, NW10 1PJ		
Site Location/Setting	Neasden Stations Growth Area		
Planning Status	<p>Planning permission 08/2627 for erection of open-fronted extension to existing waste-transfer building.</p> <p>Live planning application for comprehensive mixed-use redevelopment (23/3462) across sites B11, B03 and B09 proposing 1,151 homes, 604 student bedspaces and industrial, commercial and community use floorspace.</p>		
Status in Adopted Local Plan	<p>Within site allocation BEGA1 'Neasden Stations Growth Area' and covered by adopted Neasden Stations Growth Area Masterplan SPD – part of wider area envisaged for comprehensive redevelopment including industrial intensification, new passenger railway line infrastructure and residential development.</p>		
Proposed Status in emerging Local Plan	No current emerging Local Plan		
Status in adopted WLWP	Safeguarded as providing 31,578 tpa CDEW capacity		
Current Permitted Use	Waste Transfer		
Waste Type Inputs	CDEW		
	HIC	CDEW	Other
5 year peak (tpa)	0	83,722	0
Historic peak (if different)	As above		
Maximum permitted capacity (tpa)	322,575		
Justification for Release			
Justification:	<p>Within adopted Local Plan site allocation BEGA1 'Neasden Stations Growth Area' and covered by adopted Neasden Stations Growth Area Masterplan SPD</p>		