North London Waste Authority

NLWA Outline Business Case Development

Hendon Site Planning Assessment Report

REV B

# ARUP

North London Waste Authority

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Hendon Site Planning Assessment Report

November 2009

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# **Executive Summary**

This report covers the key planning issues affecting the nature and site location of the proposed replacement Hendon waste handling facility (WHF). The Hendon site is located at the far western side of the NLWA area, in close proximity to the existing rail-linked waste transfer station (WTS) operated on behalf of the North London Waste Authority (NLWA) and has been identified by the borough of Barnet as a replacement site for the WTS land, which is identified for redevelopment as part of a regeneration scheme for the whole of the wider Brent Cross Cricklewood (BXC) area (under an outline application lodged in March 2008).

The main assessment work for this report was carried out in the autumn of 2007. The situation at Hendon has been a changing picture since that date, and this report consolidates subsequent refinements and advice given by Arup as the BXC development proposals have emerged and discussions between the NLWA, the developer and the borough of Barnet have ensued.

The site is controlled by national policy and guidance on waste and development, at the regional level through the London Plan and the relevant Mayor's strategies and, locally, by the Barnet Local Development Framework (formerly the UDP) and the adopted Regeneration Area Development Framework (RADF). However, the requirements of these policy and guidance documents are not in all cases compatible. In particular, waste and energy policy are in a state of rapid change, and in many cases more recent policies of one document will have the effect of superseding those of another earlier document.

It is likely that, if local environmental impacts can be mitigated and if the proposals can satisfy the basic London Plan requirements for "compensatory provision," the developer's WHF proposals will be regarded as going beyond the waste facility requirements of the RADF, rather than falling short of them.

In summary, for the purposes of planning the potential layout of the site, the assessment originally concluded the following points in relation to the planning policy context for the site:

- the location provided in the RADF is effectively fixed;
- the site area is subject to clarification and open to negotiation;
- the technology choice and especially the integration of the EfW and CHP systems is open to debate but with the understanding that the developer's proposals are likely to secure the support of the planning authority; and
- the 16m height limitation mentioned in the RADF is a clear benchmark but with scope for exceedance, subject to demonstration of design quality and impact on neighbouring existing and future properties. In particular, there would appear to be scope for taller elements of the site, especially towards the eastern (railway) side of the site.
- The NLWA may be able to use the Barnet UDP combined with the compensatory provision clause in the London Plan to argue the case for greater provision by the developer than a minimalist "like for like" scheme for the WHF.

Since the original assessment was undertaken, London Borough of Barnet has resolved to grant outline planning permission for the BXC proposals, including the provision of the WHF. It is expected to be a number of months before a planning permission is issued, assuming the Mayor of London does not direct refusal and Government Office for London does not call in the application. In the interim the NLWA has engaged with the developer and Barnet regarding the WHF.

The following key conclusions were reached, in relation to the prospect of the site being acquired and securing planning permission:

- Site identified and agreed by LB Barnet and negotiations are ongoing with the developer.
- Some legal and procedural issues relating to planning and acquisition remain outstanding. Some landowner objections, which carry the risk of having to seek compulsory purchase powers.

- Railside position with direct access to rail sidings (to be developed as part of the scheme), and good access to the trunk road network.
- Adjacent uses generally not sensitive, although some residential areas nearby. There is adequate scope for mitigation through operational controls and design best practice.
- Waste use integrates very well with wider place-shaping agenda for the Brent Cross Cricklewood area.
- The highly visible site location, with a long frontage along the Edgeware Road, places considerable pressure on the architectural expression to create a workable site layout which meets the operational criteria whilst still maintaining a dynamic and lively relationship to the street.

Overall, it is concluded that the Hendon site, as now proposed in terms of location and site area, is an appropriate location for a new WHF. The site presents some design challenges, but is generally away from sensitive uses and there is adequate scope for controlling environmental risks. Importantly, there is significant potential for the waste facility to make a significant contribution to the wider area regeneration and sustainable development.

# **1** Introduction

This report sets out the results of Arup's review of the planning issues and potential for securing planning permission for a new waste handling facility at a site located between the Edgeware Road and the Midland Main Line railway, Hendon, in the western part of the borough of Barnet (hereafter, the Hendon site). The Hendon site is located at the far western side of the NLWA area, in close proximity to the existing rail-linked waste transfer station (WTS) operated on behalf of the North London Waste Authority (NLWA) and has been identified by the borough of Barnet as a replacement site for the WTS land, which is identified for redevelopment as part of a regeneration scheme for the whole of the wider Brent Cross Cricklewood (BXC) area (under an outline application lodged in March 2008 and which the Council resolved to grant on 19 November 2009).

The main assessment work for this report was originally carried out in the autumn of 2007. The situation at Hendon has been a changing picture since that date, and this report also consolidates subsequent refinements and advice given by Arup as the BXC development proposals have emerged and discussions between the NLWA, the developer and the borough of Barnet have ensued.

The site is controlled by national policy and guidance on waste and development, at the regional level through the London Plan and the relevant Mayor's strategies and, locally, by the Barnet Local Development Framework (which is made up at present of saved UDP policies) and the adopted Regeneration Area Development Framework (RADF). However, the requirements of these policy and guidance documents are not in all cases compatible. In particular, waste and energy policy are in a state of rapid change, and in many cases more recent policies of one document will have the effect of superseding those of another earlier document.

## 1.1 References

The following documents were specifically consulted in developing this note:

- Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework (BXC RADF), Adopted December 2005.
- London Borough of Barnet Unitary Development Plan (UDP), Adopted May 2006.
- London Borough of Barnet Local Development Framework (LDF).
- The London Plan (Consolidated with Alterations) Published 2008.
- BXC Developer's website:

<u>http://www.brentcrosscricklewood.com/pages/08environment/08environment.html</u> (the "Brent Cross Cricklewood Development Partners" are Multiplex Group, Hammerson plc and Standard Life Investments, with Jonathan Joseph of Bellhouse Joseph as development director).

North London Waste Plan (NLWP) Preferred Options, October 2009.

# 2 Planning Policy Context

Detailed planning policy for the BXC Masterplan is set out in the RADF with other relevant local and strategic planning policies set out in the Barnet Unitary Development Plan (UDP) and the London Plan. The UDP will be progressively replaced by the new-format Local Development Framework (LDF), which comprises a suite of general and site-specific policy documents, such as a Core Strategy, Area Action Plans (AAPs) and topic-related Development Plan Documents (DPD) documents. General policies and strategies on waste, energy and other issues are covered under a series of supporting Mayor of London strategies. Government planning guidance on waste is found primarily in PPS10: Planning and Waste and the Waste Strategy 2007.

## 2.1 National Policy Context

## 2.1.1 Planning and Climate Change – Supplement to PPS1

The supplement to PPS 1 identifies how planning, in providing for the new homes, jobs and infrastructure needed by communities, should help shape places with lower carbon emissions and more resilient to the climate change. The document requires planning to contribute towards "reducing emissions and stabilising climate change (mitigation) and takes into account the unavoidable consequences (adaptation)."

Paragraph 10 and 11 of the statement respectively outline the key principles that will be considered when deciding upon spatial strategies and in determining planning applications. The following bullet points are of relevance to this proposal;

- "The proposed provision for new development, its spatial distribution, location and design should be planned to limit carbon dioxide emissions..
- New development should be planned to make good use of opportunities for decentralised and renewable or low carbon energy..
- New development should be planned to minimise future vulnerability in a changing climate...
- Mitigation and adaptation should be considered independently of each other, and new development should be planned with both in mind."(para 10)
- "information sought from applicants should be proportionate to the scale of the proposed development, its likely impact on and vulnerability to climate change, and be consistent with that needed to demonstrate conformity with the development plan and this PPS..
- specific and standalone assessments of new development should not be required where the requisite information can be made available to the planning authority through the submitted Design and Access Statement, or forms part of any environmental impact assessment or other regulatory requirement; and..
- In considering planning applications before Regional Spatial Strategies (RSSs) and Development Plan Documents (DPDs) can be updated to reflect this PPS, planning authorities should have regard to this PPS as a material consideration which may supersede the policies in the development plan. Any refusal of planning permission on Grounds of prematurely because a DPD is being prepared or is under review but has not yet been adopted should be consistent with Government policy." (para 11)

## 2.1.2 PPS10: Planning for Sustainable Waste Management

Government guidance states that when 'searching' for suitable sites for new or enhanced waste management facilities, waste planning authorities should consider a broad range of locations and look for opportunities to co-locate facilities together and with complementary activities. The guidance also notes that consideration should be given to opportunities for on-site management of waste.

It provides the criteria for consideration when 'identifying' waste management sites; this includes:

- "The Physical and environmental constraints on development, including existing and proposed neighbouring land uses
- The cumulative effect of previous waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential
- The capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from resource recovery, seeking when practicable and beneficial to use modes other than road transport." (para 21)

PPS10 establishes that the control of pollution is the responsibility of the pollution control authorities and not the local planning authority. Applicants can prepare and submit planning and pollution control applications in parallel to ensure integrated and timely decisions from each the complementary regimes.

The policy statement identifies that waste management facilities should be well-designed, so that they "contribute positively to the character and quality of the area in which they are *located.*" (p15) Whereas poor design can undermine community acceptance and should be rejected.

The Policy statement identifies that "planning applications for sites that have not been identified, or are not located in an area identified, in a development plan document as suitable for new or enhanced waste management facilities should be considered favourably when consistent with the policies and criteria as set out in this PPS and the waste planning authority's core strategy."(para.24)

The policy statement identifies that in their determination of planning applications for waste development, local authorities should have regard to the policies of PPS10 as material considerations when development plan documents are in their early stages of preparation. It also places a requirement on planning authorities to prepare local development documents that reflect their contribution to delivering the Regional Spatial Strategy (London Plan). Paragraph 5 identifies that "*Any refusal of planning permission on grounds of prematurity will not be justified unless it accords with the policy in The Planning System: General Principles.*"

## 2.1.3 Planning for Sustainable Waste Management: A Companion Guide to Planning Policy Statement 10 (2006)

The companion guide identifies that planning applications that "come forward for sites that have not been identified, or are not located in an area identified, in a DPD as suitable for new or enhanced waste management facilities, may help implement the planning for waste strategy and should not be lost simply because they had not previously been identified." (para 8.14)

The key test is to ensure that proposals are consistent with PPS10 and the waste planning authority's core strategy. The guidance identifies that "*where they are consistent they should be considered favourably*." (para 8.14)

For waste disposal facilities, applications should be able to demonstrate that "the envisaged facility will not undermine the waste planning strategy through prejudicing movement up the waste hierarchy." (para 8.16) The guidance notes that "*if the proposal is consistent with PPS10 and the core strategy there is no need to demonstrate 'need'*." (Para 8.17)

## 2.2 Regional Context: The London Plan

The London Plan (Consolidated with Alterations Since 2004) was published in February 2008 and provides the Mayor's policy requirements for planning for waste developments and management. This is the current iteration of the London Plan and has been produced

following a series of alterations since it was published in 2004. The London Plan is the name given the London spatial strategy and replaces the strategic planning guidance for London (RPG3).

## 2.2.1 Sustainable Development

Sustainable development underpins the London Plan and should be given a great deal of consideration from the outset. Policy 2A.1 – Sustainability Criteria- states that the borough should promote, support and encourage the development of London in ways that secure the plan's social, environmental and economic objectives. This includes optimising the use of previously developed land and vacant or underused buildings, and ensuring that development takes account of the capacity of existing or planned infrastructure. It notes that consideration should be given to the physical constraints of development (for example flood risk), and ensure that any such impacts are acceptably mitigated.

The Hendon site is a previously developed site and its location in west north London make it a suitable location for the development of waste facilities to serve the Authority's area.

## 2.2.2 Selection of Sites for Waste Management and Disposal

Particularly relevant to the scoping viability of potential sites is Policy 4A.23 -Criteria for the selection of sites for waste management and disposal. This requires Development Plan Documents such as the North London Waste Plan to identify sites and allocate sufficient land for waste management and disposal, employing the following criteria:

- Proximity to source of waste
- The nature of activity proposed and its scale
- The environmental impact on surrounding areas, particularly noise, emissions, odour and visual impact
- The full transport impact of all collection, transfer and disposal movements, particularly maximizing the potential use of rail and water transport
- Primarily using sites that are located on Preferred Industrial Locations or existing waste management locations

The policy identifies that "wherever possible, opportunities should be taken to include provision for Combined Heat and Power (CHP) or Combined Cooling Heat and Power (CCHP) to accommodate various related facilities on a single site (resource recovery parks / consolidation centres)." (p223)

Several sites included within this study are located within the Central Leeside Business Area Preferred Industrial Location (PIL). These are described in the London Plan (2008) as being Strategic Employment Locations, normally suitable for general industrial, light industrial and warehousing uses. As a result, consideration should be given to Policy 4A.27 - Broad locations suitable for recycling and waste treatment facilities. This notes that local DPDs should identify adequate provision for the scale of waste, and gives the following broad locations:

- Strategic Industrial Locations (Preferred Industrial Locations and Industrial Business Parks)
- Local Employment Areas, and
- Existing Waste Management Sites.

## 2.2.3 The Proximity Principle

Emphasis is placed in the London Plan on proximity of sites to the source of waste, in accordance with the proximity principle. The proximity principle is one of four elements that make up the Mayor's strategic waste management framework based on the Best Practicable Environmental Option (BPEO). The three other aspects of the framework are the waste hierarchy, regional self-sufficiency and social, environmental and economic factors.

Commentary within the Mayor's Municipal Waste Management Strategy (2003) states that the aim of the proximity principle is to "avoid passing the environmental costs of waste management on to communities that are not responsible for its generation" and to reduce the environmental costs of transporting waste. The Strategy goes on to state that "waste management facilities should be located locally to avoid unnecessary transportation and improve local self-sufficiency for waste management, thus ensuring that local communities take responsibility for the management of the waste that they produce."

## 2.2.4 Compensatory Provision

Policy 4A.24 clarifies the issue of 'compensatory provision'. The policy states that compensatory provision will need to be in relation to the "*maximum throughput that the site could have achieved*." In addition to this pressure, the supporting text highlights the need for additional waste sites totalling some 215ha (in addition to the re-use of surplus was sites, totalling 113ha). Thus if anything the re-provision of the existing WHF should be larger than the existing.

The Hendon site would be provided as compensatory replacement for the existing railbased waste transfer station at Cricklewood.

## 2.3 Draft Replacement London Plan

In October 2009 the Mayor of London published for public consultation a draft replacement London Plan. The forward timetable for the full review of the London Plan is set out below:

Item	Timescale
Statement of Intent (Assembly Consultation)	Spring 2009
Draft London Plan for Public Consultation	Autumn 2009
Examination in Public	Summer 2010
Publication	Winter 2011/12

The document sets out a draft of the proposed policy guidance for the period to 2031. It has been produced to provide a clear spatial development framework that is shorter and easier to use. Policies are presented to address the strategic, planning decisions and LDF preparation requirements. This approach has been adopted to clarify the requirements of each policy.

The London Plan (2008) will remain in force until the new plan is formally published. However the emerging plan will be a material consideration that can be taken into account in determining planning applications.

The draft Plan acknowledges that 'London's waste is potentially a valuable resource that can be exploited for London's benefit, and not solely a disposal problem'. It is the Mayor's intention to address the challenges and opportunities 'in the most environmentally friendly and effective ways possible', this includes working towards zero waste to landfill by 2031 and maximising self sufficiency and promoting the proximity principle. In particular para 5.71 states: '...waste planning authorities should achieve the maximum degree of self-sufficiency possible commensurate with their obligations for managing waste, while recognising that in some instances the nearest appropriate installation might lie outside the Greater London boundary.' In this regard the Mayor will work with neighbouring regions (South East and East of England) 'to coordinate strategic waste management'. In this regard 'preference may be given to facilities outside Greater London if they are closest to the point where the waste is produced'. Further details will be set out in the new Waste Strategy.

In line with the current Plan there is recognition that London should manage as much of its waste within its boundaries as possible. Policy 5.16 – Waste Self Sufficiency sets out strategic objectives and how they will be achieved. The targets have been updated to provide details for 2020, but are generally consistent with the targets set out in the current

Plan. Para 5.73 sets out the circumstances where waste is deemed to be managed in London, which include:

- Where it is used for energy recovery;
- Where it is compost or recyclate sorted or bulked in a London MRF; and
- Where it is SRF (biomass fuel as defined by the current Renewable Obligation Order) produced in London.

Para 5.67 refers to a step change in municipal waste recycling performance, with 'a doubling' to 45% by 2015 and 50% by 2020. The aspiration is to secure 60% recycling by 2031. The draft Plan states these rates are consistent with recycling targets set by the Authority. It is noted that the 2015 target is also consistent with Policy 4A.21 of the current Plan.

Policy 5.17 – Waste Capacity identifies support for increasing waste processing in London and the need to identify new capacity including strategically important sites for management and treatment and locations where recycling, recovery and manufacturing activities can co-locate.

Planning applications will be assessed against a range of criteria including: locational suitability, proximity to source, nature and scale of activity, positive carbon outcome of process, environmental and transport impacts. Interestingly, proposals that include a range of complementary waste facilities on a single site, that contribute towards renewable energy (RE) generation and producing RE from organic/biomass waste will be supported. Importantly, para 5.72 notes that a flexible approach will be adopted in relation to achievement of self sufficiency, with carbon outcomes of the treatment method and transportation being the determining factor.

LDF should allocate sufficient land for waste facilities. Suitable sites will include existing waste facilities and sites in Strategic Industrial Locations – which are considered to have the most potential for waste treatment facilities, as do other brownfield and contaminated sites. Safeguarding wharves with existing or future potential for waste management will also be supported. If waste sites are lost, then alternative provision should be made.

New borough level projections of waste arisings are being prepared and will be consulted upon in 2009 and then be incorporated into the current Plan as a minor alteration.

Para 5.81 confirms that where waste cannot be recycled or composted there is a preference for 'advanced conversion waste processing technologies' (gasification and pyrolysis). Proposals would be assessed against end to end carbon outcomes, with a positive carbon outcome required. A tool for measuring and determining minimum greenhouse gas performance is being developed with local authorities (Q. is the NLWA party to this process?). Combustion of biomass waste where heat and power are generated are expected to be acceptable technologies, but mass burn incineration of mixed waste is not.

Para 5.82 states 'developments for manufacturing related to recycled waste, deriving fuel from waste and recovering value from residual waste should be supported'.

The movement of waste by river or rail is also supported and the draft Plan identifies that priority should be given to these modes.

#### 2.3.1 North London Sub-Regional Development Framework (May 2006)

The North London SRDF provides guidance on the implementation of policies in the London Plan in order to help deliver a sustainable and prosperous future for the sub-region.

The framework notes that boroughs should, through their LDDs, identify a range of facilities sufficient to meet the sub-region's required waste processing capacity (New Waste Policy 3 in the London Plan Alterations). Moreover, it identifies that recycling and waste treatments are important growth industries and it is important to consider suitable sites and

environmental separation buffers. The implications for freight will also need to be taken into account.

### 2.3.2 North London Waste Plan

The constituent boroughs of the north London Waste Authority are in the process of developing a North London Joint Waste Development Plan Document, the North London Waste Plan (NLWP). The NLWP will identify sufficient sites to deal with this waste, potentially using a mix of facilities including recycling, composting and using waste to produce energy.

The NLWP reached the issues and options stage in January 2008. The Preferred Options were published for public consultation in October 2009. The NLWP is expected to be adopted in December 2011.

The site is identified as a potential waste management site. Potential waste management sites may be considered for waste development where there are no suitable existing waste management or transfer sites that could accommodate the proposed development.

## 2.4 Barnet UDP

The Barnet UDP, which was adopted in May 2006 includes one policy on waste and a chapter on the Cricklewood, Brent Cross and West Hendon Regeneration Area.

## 2.4.1 Waste Policy

Barnet UDP Policy ENV3 - Waste Management Facilities, states:

Proposals for waste management facilities will be treated on their merits and will be assessed against the following criteria:

- The proximity of the facility to the source of waste;
- The opportunity for access by rail to the waste management facility;
- The impact of the proposal on the environment and residential amenities;
- The scale and design of plant and buildings; and
- The inclusion of energy recovery and recycling facilities on the site where possible.

Proposals which do not meet all of these criteria and have unacceptable impacts will not be permitted.

The UDP highlights the need to minimise waste and to secure the establishment of suitably located recycling facilities. The UDP also refers to the Council's Supplementary Planning Document on Sustainable Design and Construction, which makes reference to waste facilities.

#### 2.4.2 Cricklewood, Brent Cross and West Hendon Regeneration Area

The chapter on the regeneration area highlights the waste facility and the NLWA role in two key places:

#### At paragraph 12.1.17 it states:

The council is a partner in the North London Waste Authority (NLWA), and the continued use of a waste facility at Cricklewood is part of its strategy. In order to convey domestic waste in bulk by train, it is necessary to include a waste transfer station in this vicinity.

#### At paragraph 12.3.25 it states:

One of the important land uses in the area, related to rail freight, is for the existing waste transfer station. Any replacement must enable the North London Waste Authority to meet its operational needs, both in terms of statutory performance standards for household waste recycling and composting, and the requirements of the European Union Landfill Directive. The development could include a materials recycling facility that would provide a model for other sub-regional freight facilities elsewhere in London. Road access to the rail freight and

waste transfer facilities will make use of the strategic road network, but also local roads, and any proposal will need to demonstrate that the environment of residential areas will not be affected adversely.

This commentary is followed up by Policy C7 – Transport Improvements, which includes the requirement for "*provision of an enhanced, rail-linked waste transfer station serving North London.*"

## 2.5 Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework (RADF)

The BXC RADF was originally adopted in April 2004. It was revised in mid-2005 (mainly to incorporate the "Eastern Lands" in the document) and the revised RADF was adopted as Supplementary Planning Guidance (SPG) in December 2005.

The RADF specifies in Section 6 the requirements for the replacement waste handling facility, although there are other references to the WHF throughout the document. A full concordance of the text references is covered in Appendix A of this note.

The vision for the new WHF is that it will be a "*like for like*" facility to replace the existing one, albeit with improved environmental controls, the use of "*contemporary technologies*" and the additional provision of a new local collection facility either within the site or elsewhere within the regeneration area. The language of the document in relation to the WHF is deliberately imprecise and internally inconsistent, leading to a possibility that not all the requirements can be met in practice.

The following sub-sections highlight the different parameters which are specified by the RADF.

Andrew Lappage said in a recent meeting with the Authority that the RADF specifies that the new waste facility would need to take account of the requirements of the Landfill Directive. This is not a point which the RADF makes. However, such a requirement is clearly still relevant from the NLWA's point of view and is also built into the policies of the London Plan.

## 2.6 Uses and Treatment Technologies

Although the headline requirement is for a like for like reprovision, there are a number of additional or different requirements for the new facility which will require it to be something possibly quite different from the existing facility:

Firstly, the RADF envisages a new facility which will enable "*recycling and sustainable disposal of waste*," which clearly anticipates a different solution than rail transfer and landfill. This is further clarified by the "*key requirements*" which include the use of "contemporary technological solutions."

Secondly, the RADF requires, in addition to the basic reprovision of the existing facility, the ability "to accommodate local waste collection from Barnet, Brent and Camden." The RADF notes that an alternative location will need to be identified if the main WHF site cannot accommodate it. However, the "Key Requirements" list appears to clarify this as a "civic amenity site for local residents for leaving recyclables," which would seem to be a very much lesser requirement than the "local waste collection" requirement.

Note that there is no RADF requirement for the linking of the WHF and the on-site renewable energy and CHP systems (although this approach is clearly supported by the London Plan, as noted above).

## 2.7 Location

The RADF identifies a relocation site along the Edgware Road immediately to the north of the proposed new bridge over the railway.

## 2.8 Site Issues

- Location of site is fixed by the adopted Framework. Framework indicates size visually but does not specify dimensions or total area.
- Located opposite existing residential area with back to railway.
- Located immediately to north of new crossing over railway (road / ped / rapid transit)
- Adjacent site to south (incorporating bridge abutment) is zoned mixed residential and business, with building heights up to 20 storeys and density of 200-435dph.

#### 2.9 Size of the Facility

As to the size of the facility, the support for insisting on a higher capacity site appears to be stronger. It will be important for the Authority to be able to identify a potential capacity of the existing site and to provide robust evidence for this capacity. Clearly, the actual throughput is not automatically the same as the potential throughput, although the terms of any planning permission and WML would be relevant in setting the upper threshold.

It is noted that the 2004 "Mayor's Draft" NLJWS reports at several points the current throughput of 200,000tpa at the existing Hendon rail transfer facility. However, the officer's report on the Geron Way planning application (the site the south of the relocation site, which was recently refused planning permission) reports a figure of 300,000 for the new facility. Clarification is needed on the number to be used to design the new facility.

The Authority's demonstration of the potential throughput of the existing facility will need to be robust to ensure that the developer is obliged to provide the full area necessary as compensatory provision.

## 2.10 Site Area

No site area is defined for the new site (almost no area dimensions are given throughout the document). The RADF specifies that the replacement facility should provide:

Opportunities for recycling and sustainable disposal of waste. It will provide greater efficiency in operation and best practice environmental controls. The new facility will be like for like reprovision of the existing facility in terms of equivalent spatial standards and will include all of the existing services, delivered to modern standards.

The two side-by-side images in **Figure 1** below show the area described as the existing facility and the area for the new facility. On a visual basis there appears to be a similar area provided in the new site compared with the existing site. However, this would need to be validated in detail by reference to the actual area of the existing and new sites and also by reference to the throughput of the existing and new sites. This is also considered in relation to the London Plan, above.

## 2.11 Design Quality and Building Height

The RADF also specifies that the new facility will be limited to a height of 16m. By comparison, the RADF indicates building heights of up to 20 stories for the site to the south of the relocation site (on the other side of the new bridge) and across the railway to the east. Note that this would imply towers up to 60m high. The new WHF would not, therefore, be in danger of overshadowing the nearby residential and mixed use developments, although the effect on existing properties to the west (i.e., across Edgeware Road) of a WHF building or part of a building above 16m would need to be carefully considered, especially in terms of microclimate and/or rights to light.



Existing Land Uses (Figure 12 of RADF) – existing WHF shaded oxblood, within the red box.

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Development Framework (Figure 17 of RADF) – replacement WHF site shaded light blue, within the red box.

## Figure 1. RADF Images of the existing and proposed WHF sites

In addition, the following design and design process issues were raised:

- The scheme should be designed in consultation with NLWA
- To accord with the then emerging (and now adopted) GLA policies on waste handling
- Maximum of 16m in height
- Animated street frontage to Edgware Road
- Main entrance facing the street (Edgware Road)
- Roofscape design and gantry crane area to be considered in terms of local and longer distance views
- Main access from the north on Edgware Road.
- Rail access from north and south

The Hendon site is located at the far western side of the NLWA area, on a strip of land between the Midland Main Line (near Cricklewood Sidings) and the A5 Edgware Road. The

land has been identified by LB Barnet as a replacement site for the existing rail-based waste transfer station (WTS) currently operated on behalf of the Authority. The Brent Cross Cricklewood (BXC) area is subject to major comprehensive redevelopment proposals (under an outline application lodged in March 2008) and the Hendon site is indicated in these proposals as the replacement site for the existing WTS site.

# **3 The BXC Masterplan**

The BXC and West Hendon redevelopment will comprise, according to the RADF:

- up to 420,000m<sup>2</sup> of business space, primarily comprising office accommodation
- In the region of 10,000 new homes of mixed type and tenure
- 27,000 m<sup>2</sup> of leisure space
- 55,000 m<sup>2</sup> of comparison retail
- 20,000 m<sup>2</sup> of convenience shopping
- two new hotels
- community facilities (quantum and nature to be defined)
- freight facility
- a replacement waste handling facility

The sustainable development performance of the scheme will be critical to it being granted planning permission. Consequently, on-site renewable energy facilities capable of supplying possibly up to 20% of on-site demand (in carbon terms), together with a potentially integrated combined heat and power (CHP) system, must form a key element of the site infrastructure to be included in the development.

Note that the above parameters relate to the combined developments at West Hendon and the BXC development area. Therefore some of the BXC developer's quanta of development may be less than the totals for the whole regeneration area.

## 3.1 The Waste Handling Facility

The replacement waste handling facility is loosely specified to be a "like for like" replacement of the existing rail transfer facility, which is currently operated on behalf of the North London Waste Authority (the Authority) by Waste Recycling Group (WRG). The facility provides a bulking and transfer service with the destination for most material being landfill (delivered via rail).

We understand that the Authority's lease on the existing site expires at present in 2009. Although it would, in the absence of the present masterplan proposals, have sought to renew the lease, the Authority's longer-term objectives support the replacement or modernisation of the rail freight facility to enhance the rate of diversion of waste from landfill.

#### 3.1.1 BXC Developer's Current Proposals

The developer's website (see Section 1.2 for URL reference) describes the waste handling and energy elements as follows:

A state-of-the-art waste handling and recycling facility will be built, replacing the current ageing facility from which most of the waste is sent to landfill sites.

This will separate and sort all recyclable materials first and then pass the remaining unrecyclable waste through a treatment cycle which will generate a renewable fuel.

This fuel will then be used in a new 'Combined Heat and Power Plant' which will provide electrical power, district heating and cooling to buildings across the regeneration area.

By putting in place the necessary pipes, cables and other infrastructure, the use of sustainable fuels can increase over time as renewable energy technologies improve and other fuels, such as biomass and hydrogen, become more readily available and reliable.

The website also publishes a graphic comparing conventional energy with energy-fromwaste (EfW) systems, reproduced below. The source of this information is not referenced.



The developer also proposes "an automated waste collection system, consisting of a network of buried pipes along which waste is moved", i.e. the ENVAC system. It is presumed that this system would meet the requirement for facilities for local collection, although this is not made clear.

## 3.2 Recent Developments

An outline planning application for the BXC development was lodged in March 2008, and on 19 November 2009 Barnet Council resolved to grant planning permission for the scheme, subject to conditions, informatives and a S106 agreement. It is expected to be some months before the S106 is finalised and the application referred to the Mayor of London and Government Office for London.

In relation to the waste site, the location identified in the RADF is shown on the developer's parameter plans for use as a waste site, as detailed at Figure 2. The site area is not recorded, but was understood to be approximately 2.5ha. The outline planning application incorporates a number of parameters as set out on Parameter Plan 07 and Appendix 10 of the Development Specification. The parameters refer to a maximum floorspace of 24,700m2 and a range of parameters for the built structure including: a minimum height of 12m, length of 189m and width of 24m, and a maximum height of 30m, length of 297m and width of 102m. These parameters have informed the preparation of the Environmental Statement submitted with the scheme, as has the assumption of 712 vehicles per day. Development within the parameters should not be subject to additional EIA.

One of the existing site owners has not agreed to sell its site and therefore it will be necessary for the site to be acquired under compulsory purchase powers.

The site is therefore supported by the adopted development plan and firm proposals within a planning application which the Council has resolved to grant.



Figure 2: View of Proposed Site

# 4 Site Suitability Assessment

This section sets out the results of the assessment of the Hendon site as a potential residual treatment site. The assessment considered a range of indicators, drawing on guidance contained within PPS10 and the London Plan, as follows:

- Site size and suitability
- Transport issues, including the potential for integration with water or rail transport modes
- Flood risk
- Nature conservation and visual impact on local landscapes and townscapes
- Proximity to residential and other sensitive uses
- Site ownership and the potential for acquisition
- Potential for co-location of facilities and linkages of thermal treatment of waste with provision of CHP and district heating networks

## 4.1 Site Location

The proposed site for the replacement Hendon WHF is a rectangular shaped site placed between the A5 Edgeware Road (which marks the Barnet-Brent borough boundary) and the Midland Main Line railway at Cricklewood sidings. The immediate surroundings are a mix of industrial and commercial properties, which continue to the north and west towards Staples Corner and the M1 motorway, with residential area of Dollis Hill located to the south and west. The site location is shown in **Figure 3**.



Figure 3: Hendon Location

## 4.2 Site Data Tables

The following tables provide a summary of the key features and assessment results of the site, using a range of environmental impact, sustainability and practicability criteria.

Location	Hendon Site
Address	A5 Edgeware Road, Hendon
Site Owner	Brookfield, Bestway, Parcelforce and others
Current Use	Warehouse / Cash & Carry
Current Occupier	Bestway / vacant
Size	2.5ha (subject to negotiations with developer)
Shape	Rectangular
Physical Condition	Brownfield / paved
Owner Feedback	Developer willing to secure / acquire, but Bestway believed to be unwilling to sell.

Access	
Internal Access	Narrow site may impede circulation. Access only onto A5 Edgeware Road.
External Access	A5 Edgeware Road. Access / egress only to/from the north. Southbound movements would need to turn north and reverse via the next roundabout (mixing with Brent Cross shopping centre traffic).
Sustainable Transport Options	Site can be integrated with rail sidings, providing excellent access to low carbon transport for export of waste materials.
Land Use Designations	
Planning Policy	Replacement of the existing Cricklewood WTS with a new site is supported by the Barnet UDP. The site is (partially) identified in the adopted SPG for the Opportunity Area. The site is identified as a potential waste management site in the NLWP Preferred Options.
Preferred Industrial Location	The site is located within an identified employment area.
Existing Employment Use	Yes
Existing Waste Use	No
Habitat/ Metropolitan Open Land	No
Need for Enabling Works/ Mitigation Works	Demolition required along with site remediation works. Basic infrastructure is in place.
Sensitive Receptors	
Proximity to Residential Areas	Residential areas located to the south west of the site (opposite Edgeware Road at Oxgate Gardens). A school is located nearby on Edgeware Road, on the Brent side.
Other Considerations	

Cumulative Waste Developments	The site would be a replacement for an existing waste site, thereby there is no net change in the concentration of waste sites in the area.
Historical Buildings and Archaeological Remains	The site is not located within a conservation area, and there appear to be no listed buildings within the site (although this will need to be checked more thoroughly in the future).
Environment	
Flood Risk	The site is not within an area liable to flooding.
Surface Waters	None in the vicinity.
Statutory Designations	None.
Non Statutory	None.
Local Environmental Impacts	Small risk of impacts to nearby residential areas. These can be mitigated through good design and traffic management.
Townscape Visual Analysis	The area is of poor visual quality. With good design the waste site could make a positive contribution to the townscape and street environment. The highly visible site location, with a long frontage along the Edgeware Road, places considerable pressure on the architectural expression to create a workable site layout which meets the operational criteria whilst still maintaining a dynamic and lively relationship to the street.
Other	This site has the benefit of strong political support from LB Barnet. In addition, the proximity of a confirmed development proposal gives rise to the potential for use of solid recovered fuel (SRF) for generation of low carbon energy (heat and power) to the new development. If realised, this would provide added benefits through avoided transport costs for more remote disposal solutions.

# **5** Planning Risk Assessment

This site assessment identifies the Hendon site as suitable for development as a waste handling facility. However, there are a number of issues which highlight the potential for a planning authority to refuse a planning application. For that reason the site has been considered in greater detail against the risk of refusal of planning permission and against the dismissal of an appeal. This review is divided into two sections, covering generic planning risks and those specific to the Hendon site.

## 5.1 Generic Planning Risks

The following factors are considered to be key risk issues which would have a significant effect on the overall timescale for a planning decision for a waste development, and on the decision itself.

Thermal treatment: this might include, on a downward sliding scale of difficulty, conventional "black bag" incineration (EfW), SRF incineration or AD-derived biogas incineration. Gasification and pyrolysis processes also comprise thermal treatment, although it is recognised that the London Plan support for these "advanced thermal treatment" technologies will significantly reduce their risk relative to conventional incineration methods.

The clear emphasis in the London Plan that residual waste treatment in London should move away from EfW and towards advanced treatment technologies, coupled with the prospect of vociferous and well-organised public opposition to a new incinerator, place the risk of ultimate refusal of EfW in a quantum level above the other treatment options. Whereas other aspects of risk are focused on the impacts expressed in time delay or cost of mitigation or reworking a proposal, the fundamental policy objections to EfW may mean that such a facility will simply not be permitted.

- **Departure from, or lack of, an adopted development plan**: if the proposed waste development is on a site not allocated for waste, or if the detailed proposal is in conflict with the policy or allocation for that site, then the proposals will have an uphill struggle.
- Lack of extensive stakeholder engagement and robust site selection processes: if
  objections are not identified and addressed in the pre-application period, they will come
  out during the post-application period. Once in the public forum of a planning
  application process, the rules are less flexible and the timescales for discussion and
  modification of the scheme will be longer.
- A rushed application: applications which are not prepared with care or which are rushed to meet a fixed deadline are at a high risk of having gaps and inconsistencies identified which, even if inconsequential, will impose delays as clarifications are sought and provided.

Most mitigation measures to the above risk factors are self-evident: careful preparation, stakeholder engagement, and awaiting the adoption of the Waste DPD are essential to avoid unnecessary delays or refusal. The question of thermal treatment, as it is a fundamental technical decision on the type of treatment proposed, is not so easily mitigated. However, the key mitigation measures for a thermal treatment application would be:

- Ensure the site is allocated in the (adopted or emerging) Waste DPD for thermal treatment.
- Undertake best practice environmental baseline monitoring, especially in relation to air quality.
- Undertake an extensive public and stakeholder information campaign to ensure that objections are informed and based on an accurate understanding of the nature and risks of the proposed facility.

Ensure the proposed development maximises the benefits of the thermal treatment, i.e. put in place a robust strategy for securing a market for both the heat and power from the facility.

Finally, decision delay could be mitigated by an aggressive planning application strategy, in which the applicant would appeal to the Secretary of State as soon as the sixteen-week time period expired. This could provide a substantial savings of time compared with a more conventional refuse-then-appeal scenario, but its success would rely all the more on a well-prepared and fully complete application being lodged, as well as the NLWA as applicant ensuring that no element of the delay to the decision could be attributed to it. However, the political implications of such an approach being undertaken by a public body should be considered carefully.

A high quality submission of a thermal treatment facility which was allocated for that purpose in the adopted development plan might well be approved within 2-3 years. The recent experience of Hampshire County Council appears to support the case that these applications need not always be subject to extensive and punitive delays.

## 5.2 Hendon Planning Risk Assessment

As noted in the preceding sections, the site is specifically allocated for waste use in the adopted development plan. There is also a range of detailed site and design issues which would be material considerations for the local planning authority or Secretary of State in making a determination of the application or appeal. These issues are considered in turn, along with a recommendation for each issue on appropriate mitigation strategies.

## 5.2.1 Compatibility with Adopted and Emerging Planning Framework

The Hendon site is identified for waste use within the adopted development plan and is identified as a potential waste management site in the NLWP Preferred Options. The site is therefore compatible with the planning framework.

It is also of material significance that the BXC outline planning application, which is expected to be granted permission in summer 2009, identifies the site for waste use.

Finally, the site would be provided as compensatory replacement for the existing Cricklewood sidings on the opposite side of the railway corridor and as such would deliver a key compliance criterion with the London Plan.

## 5.2.2 Site Capacity

It is understood that the Hendon site, if the whole site were acquired and developed, would be sufficient to fit the maximum requirements for the western area site in the Reference Project. However, should only the smaller size site be able to be secured (i.e. if the CPO for the larger site failed) then the site would not be suitable as a residual waste treatment facility in line with the reference project. In such an event the likely scenario would be to seek to develop a different site for waste treatment and to use the Hendon site as a replacement rail-based waste transfer station (RTS). A third option might involve partial success of the CPO, in which case a residual waste handling facility might be able to be developed, with the balance made up on another site in the west of the area, or within the Upper Lee Valley sites. There are therefore three potential site options:

- the full Hendon site as identified by the Authority;
- a smaller site used for a more limited waste treatment facility;
- an RTS-only option.

#### 5.2.3 Access and Traffic

Traffic capacity and access to Hendon is good but turning restrictions and congestion on the A5 may place a limit on the capacity of the site. The key benefit of the site is its ability to link to rail freight transport and this is likely to be a very strong supporting factor for any planning application.

The road traffic issues will need to be addressed through the following key actions:

- assessing traffic impacts at key junctions in the area and where necessary identifying infrastructure improvements and active traffic management measures to increase capacity at bottlenecks and reduce the risk of clumping of HGV traffic.
- agreeing the scope of the traffic assessment with the local authority, with particular reference to the junctions and highways to be assessed and the additional developments assumed to be completed by the assessment year (i.e. the year when the waste facility would be brought into use).

#### 5.2.4 Energy and Sustainable Design

Given growing importance of climate change and resource reduction in the regulation of the built environment, low-carbon energy and sustainable design are becoming key drivers for the planning system. The waste facility will make a significant contribution to reduction of the carbon impact of north London's waste, compared with the current practice of low recycling rates and a significant amount of disposal by landfill.

This overall "good news" story can be enhanced in terms of the local design issues through a range of mitigation and enhancement measures for the Hendon site:

- incorporation of a combined heat and power facility within the site, with the potential to
  export heat not required to assist the waste treatment processes. The site's proximity to
  a major redevelopment area greatly strengthens the viability of a district heating
  scheme, but this would need to be assessed in greater detail and it may be an important
  factor for securing permission.
- advanced methods and technologies for water conservation, including sustainable urban drainage systems (SUDS), rainwater harvesting and the development of green roofs.
- use of local materials and low carbon materials in the design of the facility

#### 5.2.5 Visual Impact and Design Quality

The design of a visually pleasing development will greatly assist the case for the planning application. A high quality architectural design can engage decision-makers in a positive way and acts, for those decision-makers, as a strong indicator that care has been taken over all aspects of the development. Particular aspects which will reduce the risk of refusal are:

- a clear architectural concept which is visually pleasing and fits well with the surrounding area in terms of layout, height, massing, form, colour, texture and materials.
- The long boundary with the A5 Edgware Road creates an opportunity for a strong building line with a dramatic architectural treatment.

#### 5.2.6 Community Benefits

New development and the investment it brings can make a positive contribution to the local community. This is more than compensating for impacts; instead, the waste development can make a contribution in several areas:

- Job creation for both construction and operation. The scheme should incorporate measures to ensure local people and firms have access to jobs and contract opportunities.
- Education and visitors centre: a new waste facility can be an important beacon of a sustainable community. The scheme should include a visitors centre accompanied by an education and outreach programme for the local community.

## 5.2.7 Mitigation of Local Impacts

While much attention will be focused on the enhancements which the development could offer, the need for robust noise, air quality and odour control measures will be a foundational element of any scheme.

## 5.2.8 Site Alternatives

As noted above, given that the site may not be specifically allocated for waste use, the decision to site the waste facility at Hendon will be tested against other options which were considered. This and other site assessment reports could form part of the evidence base to demonstrate that a robust site search and appraisal process was undertaken. However, it is noted that the key benefit in terms of rail transport and the very limited supply of sites in this part of north London are unlikely to enable a successful challenge on the grounds that other alternatives were readily available.

## 5.2.9 Community and Stakeholder Engagement

A very important feature of the new planning system is the "front loaded" nature of the process and the enhancement emphasis on meaningful pre-application engagement with key stakeholders and the community as a whole. This message has been reinforced through the Government's current work to develop procedures for applications for Development Consent submitted to the Infrastructure Planning Commission. Although these waste developments will not be determined by the IPC, the effectiveness of consultation will still be of critical importance to supporting the case for the planning application.

## 5.2.10 Conclusions

The table below provides a summary of the risk assessment.

Issue	Risk Level	Availability of successful mitigation strategies
Compatibility with Adopted and Emerging Planning Framework	Low	Limited. NLWA cannot control the outcome of planning policy decisions by the waste planning authority or the local planning authority.
Site Capacity	Medium	Limited. The size of the site remains uncertain and depends on the success of a CPO. This remains a key risk area.
Access and Traffic	Medium	Very good rail access. Road access is good but will need to be carefully assessed.
Energy and Sustainable Design	Medium	Good.
Visual Impact and Design Quality	Low	Good
Community Benefits	Low	Good
Mitigation of Local Impacts	Medium	Good, but with local residents this could be a major issue of concern.
Site Alternatives	Low	Good.
Community and Stakeholder Engagement	Low	Good.

# 6 Conclusion

For the purposes of planning the potential layout of the site, this assessment originally concluded the following points in relation to the planning policy context for the site:

- the location provided in the RADF is effectively fixed.
- the site area is subject to clarification and open to negotiation, but if extended beyond the area or parameters established in the outline planning application, would be likely to require a new planning application.
- the technology choice and especially the integration of the EfW and CHP systems is open to debate but with the understanding that the developer's proposals are likely to secure the support of the planning authority.
- the 16m height limitation mentioned in the RADF is a clear benchmark but with scope for exceedance, subject to demonstration of design quality and impact on neighbouring existing and future properties. In particular, there would appear to be scope for taller elements of the site, especially towards the eastern (railway) side of the site.
- The NLWA may be able to use the Barnet UDP combined with the compensatory provision clause in the London Plan to argue the case for greater provision by the developer than a minimalist "like for like" scheme for the WHF.

The final assessment was carried out on the basis of the revised site location and area recently agreed with the BXC developer, with the following key conclusions, in relation to the prospect of the site being acquired and securing planning permission:

- Site identified and agreed by LB Barnet and negotiations are ongoing with the developer.
- Some legal and procedural issues relating to planning and acquisition remain outstanding. Some landowner objections, which carry the risk of having to seek compulsory purchase powers.
- Railside position with direct access to rail sidings (to be developed as part of the scheme), and good access to the trunk road network.
- Adjacent uses are generally not sensitive, although there are some residential areas nearby. There is adequate scope for mitigation through operational controls and design best practice.
- Waste use integrates very well with wider place-shaping agenda for the Brent Cross Cricklewood area.
- The highly visible site location, with a long frontage along the Edgeware Road, places considerable pressure on the architectural expression to create a workable site layout which meets the operational criteria whilst still maintaining a dynamic and lively relationship to the street.

Overall, it is concluded that the Hendon site, as now proposed in terms of location and site area, is an appropriate location for a new WHF. The site presents some design challenges, but is generally away from sensitive uses and there is adequate scope for controlling environmental risks. Importantly, there is significant potential for the waste facility to make a significant contribution to the wider area regeneration and sustainable development. However, uncertainties around the likelihood of the wider regeneration proposals being delivered and the ability to acquire the site are key issues that will need to be addressed.

Appendix A

Brent Cross Cricklewood RADF Extracts Text reproduced in the table below is from the December 2005 adopted BXC Regeneration Area Development Framework.

Citation	Text
Section 2:	The Vision
Page 10	A new waste handling facility will be provided. The facility will be railway linked and will provide opportunities for recycling for local residents and the sustainable disposal of waste.
Section 3:	The Area Today
Page 20	The Claremont Way Industrial Estatehouses a mix of commercial and light industrial activities, varying from large operations such as a sand and gravel depot, to a waste transfer station.
Page 22	Figure 12: Existing Land Use. Shows existing WTS (using a differently-shape polygon than in Figure 15, below).
Page 24	The existing waste transfer station is situated alongside the railway. The entrance to it is from Claremont Way Industrial Estate. The facility is approaching 20 years old, and would benefit from some improvement to bring up to modern environmental standards.
Page 25	Figure 15: Environmental Constraints. Shows existing WTS (using a differently-shaped polygon than in Figure 12, above).
Section 4:	Development Framework
Page 26	Strategic Principles (inset box): <i>Provision of strategic waste handling and recycling facilities for local residents.</i>
Page 27	Figure 16: Strategic Principles. Shows new location of WHF (visually similar in size to size shown on Figure 12).
Page 28	Land Use Mix: The area will comprise approximately
	[list of development quanta and elements]
	a waste handling facility
Page 29	Figure 17: Proposed Land Uses. Shows new location of WHF (same is in Figure 16).
Section 5:	Transport Vision
Page 47	Parking Standards: Commercial (freight and waste recycling facilities): Operational parking [i.e., numerical standard not provided].
Section 6:	Design Framework
Page 71	Figure 37: Waste Handling Facility. Provides indicative layout, showing key design parameters:
	Roofscape and crane area design and visual impact issues
	Edgeware Road "active frontage"
	neighbouring land uses
	rail freight access
	Building "front door" location
	vehicle entry / egress point
	• "building envelope will be environmentally sealed [?] where appropriate" to

Citation	Text
	control noise and odour impacts on nearby sensitive receptors.
Page 71	Special Features:
	The new facility will be <u>rail linked</u> and will provide <u>opportunities for recycling and</u> <u>sustainable disposal of waste</u> . It will provide <u>greater efficiency</u> in operation and <u>best practice environmental controls</u> . The new facility will be <u>like for like</u> <u>reprovision of the existing facility in terms of equivalent spatial standards</u> and will include <u>all of the existing services</u> , <u>delivered to modern standards</u> .
Page 71	Land Use Mix:
	This facility will need to be designed <u>in consultation with the North London</u> <u>Waste Authority</u> , to accord with the <u>emerging GLA policies on waste handling</u> . The facility will be <u>required to accommodate local waste collection</u> from Barnet, Brent and Camden.
	If this cannot be located near to the waste handling facility, a suitable location in another part of the regeneration area will need to be identified in order to provide this much needed function.
Page 71	Built Form and Height
	The facility will be a <u>maximum of 16 metres in height</u> . It will have an <u>animated</u> <u>street frontage to the Edgware Road</u> with a <u>main entrance facing the street</u> . Consideration should be given to the <u>appearance of the roofscape and gantry</u> <u>crane area</u> with regard to views from surrounding residential development.
Page 71	Access Parking and Servicing
	The main vehicular <u>access will be to the north of the site</u> from the Edgware Road. Vehicle movements will be predominantly within the envelope of the facility. <u>Trains will access the facility from the north and south</u> .
Page 71	Key Requirements [inset box]
	Like for like reprovision of the existing facility
	Equivalent spatial standards
	Contemporary technological solutions
	Adjacent buildings to be sensitively designed to minimise potential "bad neighbour" relationships and allow operational activity to take place
	Civic amenity site for local residents for leaving recyclables
Section 7:	Way Forward
Page 72	Development Phasing and Key Projects
	• Phase 1: The core components of the new town centre are assembled. The new bus station is built. The redevelopment of West Hendon is started. Improvements to the existing infrastructure are underway. The new bridge over the A406 North Circular Road is established. Improvements to
	Clitterhouse Fields are undertaken.

Citation	Text
	the freight facility, and in preparation for the new station. Residential development takes place at the southern end of the area defined by the Development Framework. West Hendon is complete. The mix of uses on the north side of the A406 North Circular is completed.
	• Phase 3 <u>: The waste handling facility and the bridge over the Midland</u> <u>Mainline Railway are built.</u> Mixed use development takes place around the new bridge. The new station is opened, together with the completion of the High Street on the south side of the A406 North Circular Road. The commercial district is becoming established.
	Phase 4: The commercial district is completed.