

BPP Consulting for Richmond Council

Arlington Works Appeal APP/L5810/W/20/3249153

The Table presents an 'at a glance' assessment of the sites proposed by the Appellant as offering compensatory capacity as at 19.01.2021.

Site	Policy WLWP2 Criteria			Comment
	In WLWP Area?	Deals with same Type of Waste?	Same Type of Process ?	
Table 2 MM Proof				
Associated Reclaimed Oils (ENVA)	No	Yes	?	Actual nature of operation unknown Available capacity still to be confirmed
Brent Oil Contractors	Yes	Yes	No - site is transfer only, contrary to description in MM proof Table 2	Some outputs of site previously flowed to Sharpes for treatment, now flows out of London.
Powerday	No	No	No	Site planning permission limits waste input to municipal and inert waste.
Williams Environmental	No	Yes	?	Actual nature of operation unknown Available capacity still to be confirmed
Additional site in MM Proof				
Heathrow Airport Street Sweepings	Yes	No	No	Site does not have planning permission - operates under pd rights for airport waste only
Additional sites introduced during inquiry				
Slicker Recycling	No -site is in Medway, outside WLWP area and London.	Yes	Yes	Uncertainty over availability of capacity for London's waste
Quattro Southall	Yes	No	No	Site only has temporary permission. See separate note about future prospect.

Conclusion

None of the sites proposed by the Appellant as offering compensatory capacity as at 19.01.2021 actually meet the policy tests of WLWP 2. A suitable site would need to rate green for all three criteria. This is aside from confirmation of the actual capacity that might be available, and the willingness of the site operator to accept the waste. These all contribute to the overall determination of deliverability of the capacity to allow release of the appeal site from safeguarding for a waste use.

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Comments on Alternative Capacity Assessment Method

The appellant has presented an Excel spreadsheet which is purported to show notional capacity for the management of hazardous waste within selected permitted sites in the WLWP area.

1. It is based on a purely arbitrary approach of calculating 25% of the peak hazardous waste input for sites in the Plan area to arrive at an overall figure.
2. This theoretical approach does not establish the actual existence of capacity for the management of waste that may be lawfully managed at the appeal site. Neither does it address the quality of the capacity being provided in terms of the type of waste actually managed or the type of processes it is subjected to. This is important to ensure that hazardous waste would not be move down the waste hierarchy as a consequence of release of the appeal site.

Conclusion

I conclude that acceptance of this theoretical method as a basis on which the availability of compensatory capacity might be determined, fails to demonstrate deliverability and would undermine the very purpose of safeguarding which is to secure capacity that is at least equivalent in terms of quantity and quality.