



Proposed Submission West London Waste Plan

Assessment of Existing Waste Sites for Release

Version Description: Regulation 19 Consultation

Version: 3.0

Issued: July 2026

BPP Consulting Document Control

Project: Proposed Submission West London Waste Plan

Report: Assessment of Existing Waste Sites for Release

Version Description: Reg 19 Consultation

Version No.: 3.0

Date: 23.07.2026

Version No.	Version Description	Author	Date	Reviewed	Date
0.1	Partner Review	Alan Potter (Partner)	25.08.2025	David Payne (Partner)	27.08.2025
1.0	LPA Review	Alan Potter (Partner)	27.08.2025	LPAs	02.09.2025
1.1	Post LPA Review	Alan Potter (Partner)	02.09.2025	David Payne (Partner)	03.09.2025
1.2	Post LPA Review v2	Alan Potter (Partner)	04.09.2025	LPAs	07.11.2025
2.0	Regulation 18 Consultation Proposed	Alan Potter (Partner)	11.11.2025	LPAs	20.11.2025
2.1	PCR Regulation 18 Consultation Proposed	Alan Potter (Partner)	03.12.2025		
3.0	Regulation 19 Consultation Proposed	Alan Potter (Partner)	22.07.2026	LPAs	23.07.2026

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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.
3.0	BPP Review	22.07.2026	Various edits to reflect Reg 19 capacity updates Removal of "proposed" for release. Capacity sharing arrangement more focussed based on London Plan.

Note to Reader: This report is based on the latest position regarding waste management capacity in the Plan area at the time of finalising (July 2026). Therefore, it uses slightly different values for capacity than those set out in the Regulation 19 Proposed Submission WLWP (May 2026). For clarity this is intentional and reflects the actual position as set out in the corresponding updated Capacity Assessment Report (July 2026).

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Executive Summary

The seven west London local planning authorities (LPAs) have prepared a Proposed Submission West London Waste Plan (WLWP). This involves amongst other matters 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 19 Proposed Submission WLWP will release a small number of existing waste sites identified by the LPAs, on the basis that the plan area still has sufficient capacity to meet identified waste needs, and their continued safeguarding and use for waste would conflict with wider planning and regeneration objectives for specific areas. As per Paragraph 9.8.6 of the London Plan, the LPAs intend to continue engagement in relation to these requests and will, as a starting point, seek to make the equivalent amount of capacity as provided by the sites to be released available to other London LPAs with demonstrable unmet needs, in the event a capacity sharing request meets the evidential threshold.

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 manage the apportionments for HIC waste in the London Plan and forecast arisings of construction and demolition (C&D) waste and hazardous waste, over the plan period.

Introduction and Context

1. The seven west London local planning authorities (LPAs) have prepared a Proposed Submission 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 Proposed Submission West London Waste Plan applies 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. While such sites may also benefit from an Environmental Permit issued by the Environment Agency for waste-related operations, the existence of such a permit 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 subject to an Environmental Permit for waste use but are not lawful under land-use 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 applied through the Proposed Submission 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 expects boroughs to offer to share these sites with those boroughs facing a shortfall in capacity (Paragraph 9.8.6). This is taken to mean that the capacity provided by the sites to be released should be shared, rather than planning authorities granting privileged access to a specific site. This interpretation fits with the fact that this idea is framed within an expectation that boroughs considering releasing such sites will have a "surplus".
- 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. The release of the existing waste sites that would otherwise be safeguarded through the 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).
- 9. Ultimately, whether release can occur also depends on whether it can be demonstrated that sufficient qualifying capacity to provide for the tonnages of HIC waste apportioned through the London Plan can be managed within the Plan area and net self-sufficiency for London as a whole is not compromised. This document is published alongside the Regulation 19 Proposed Submission WLWP and an updated Capacity Assessment that demonstrates this will remain the case for west London for the Plan period. Hence there is no impediment in principle to release.

Existing Waste Sites to be Released

10. As part of the assessment under para 5 above, six existing waste sites are to be released from safeguarding through the Proposed Submission WLWP. The identification of each site has been undertaken with consistent consideration given to the factors set out below. The rationale for the release of each of these is set out in the site profiles included in Appendix 1 of this report.
11. When considering the release from safeguarding of specific existing waste sites potential conflict with Local Plan policy has been identified as the key justification. 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.
12. 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 a proposed non-waste related 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).

13. Other supplementary information, which helps to characterise the sites to be released has been gathered as far as possible-

Updated Waste Management Capacity Assessment

14. The updated Waste Management Capacity Assessment produced in 2026¹ forms part of the evidence base for the Regulation 19 Proposed Submission 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 0.43 million tpa in 2021 falling to almost 0.31 million tpa in 2041 (decline in surplus due to rising apportionment);
 - Construction & Demolition² waste : 1.07 million tpa in 2021 falling to 0.85 million tpa to 2041 (surplus falling at 2031 due to temporary permissions expiring and rising growth forecast).
15. When the quantum of capacity provided by the existing waste sites to be released is deducted from the assessed capacity, a substantial 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	2,527,744	2,527,744
Difference - Surplus Capacity	+435,744	+306,744
Minus Release of Selected EWS	-18,646	
Remaining Capacity 'Surplus'	+417,098	+288,098
Surplus as % of Apportionment	+20% headroom	+13% headroom

¹ WLWP Regulation 19 *Capacity Assessment Update*, BPP Consulting (July 2026)

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	2,259,051	2,193,476	2,193,476	2,193,476
Difference - Capacity Surplus	+1,073,956	+930,409	+891,409	+851,204
Minus Release of Selected EWS	-209,359			
Remaining Capacity 'Surplus'	+864,597	+721,050	+682,050	+641,845
Surplus as % of Forecast	73%	57%	52%	48%

16. 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 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.
17. As detailed in the Existing Waste Sites to be 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 provide for the management of the tonnages of HIC waste apportioned to each Brough through the London Plan which go above and beyond the forecast needs of the Plan area (see Table 3), and any other identified waste need to be met within the Plan area. The latest Waste Management Capacity Assessment confirms there is sufficient capacity to enable release of the EWS that form part of larger regeneration schemes without these objectives being put at risk.

Unmet Needs of Other London Boroughs

18. 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.
19. The London Plan apportionments of HIC waste already take into account the ability of individual boroughs to provide for the management of 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 nearly c4.0% (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%

20. All London Boroughs were invited to submit representations through the formal consultation on the Regulation 18 Draft Updated WLWP and some requests were received in response to this. As per Paragraph 9.8.6 of the London Plan, the LPAs intend to continue engagement in relation to these requests and will, as a starting point seek to make the equivalent amount of capacity available as provided by the sites to be released (as a minimum). For the Proposed Submission WLWP to be sound, any arrangement must be based on robust evidence. Therefore, these Boroughs have been invited to demonstrate, amongst other matters, that all other avenues of making provision within their respective Plan areas have been thoroughly explored.

Appendix 1: Sites to Be Released Through Proposed Submission 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). Within the Old Oak West Supplementary Planning Document (SPD) area.	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). Within the Old Oak West Supplementary Planning Document (SPD) area.	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 Proposed Submission Version (examination stage) detailed in Chapter 12: Site Allocations		
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. Within the Old Oak West Supplementary Planning Document (SPD) area.		
Planning Status	None		
Status in Adopted Local Plan	. Within Channel Gate Place Policy (P9) and within site allocation 26 (Channel Gate) of the OPDC Local Plan 2018-2038 with targets for 3,100 homes and minimum of 10,700sqm commercial or industrial floorspace. The Old Oak West SPD also provides planning guidance to shape the future of Old Oak West aligned to these Local Plan policies.		
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:	Key site allocation (site allocation 26 (Channel Gate) in OPDC's Local Plan. Comprehensive development of this site will deliver 3,100 homes and minimum of 10,700sqm commercial or industrial floorspace) with a new park and social infrastructure. This forms a critical component of the wider Old Oak scheme proposed to deliver over 8,000 homes and over 10,000 jobs.		

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. Within the Old Oak West Supplementary Planning Document (SPD) area.		
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) of the OPDC Local Plan 2018-2038 with targets for 1,650 homes and minimum of 8,000sqm commercial or industrial floorspace. The Old Oak West SPD also provides planning guidance to shape the future of Old Oak West aligned to these Local Plan policies.		
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 (since 2018) and is a key site allocation (site allocation 11 (Acton Wells East) in OPDC's Local Plan with targets to deliver 1,650 homes and min. of 8,000 commercial or industrial floorspace. This forms a critical component of the wider Old Oak scheme proposed to deliver over 8,000 homes and over 10,000 jobs.		

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		Planning permission 05/3597 for extension of existing metal-recycling facilities. 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.			
Status in Adopted Local Plan		Within site allocation BEGA1 ‘Neasden Stations Growth Area’ in the Brent Local Plan 2019-2041 and covered by adopted Neasden Stations Growth Area Masterplan Supplementary Planning Document – part of wider area envisaged for comprehensive redevelopment including industrial intensification, new passenger railway line infrastructure and residential development.			
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:	Within adopted Local Plan site allocation BEGA1 ‘Neasden Stations Growth Area’ and covered by adopted Neasden Stations Growth Area Masterplan SPD				

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	Planning permission 01/2193 for retention of waste-transfer station enclosure and continued use of enclosed area for waste transfer purposes. 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.		
Status in Adopted Local Plan	Within site allocation BEGA1 'Neasden Stations Growth Area' in the Brent Local Plan 2019-2041 and covered by adopted Neasden Stations Growth Area Masterplan Supplementary Planning Document – part of wider area envisaged for comprehensive redevelopment including industrial intensification, new passenger railway line infrastructure and residential development.		
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:	Within adopted Local Plan site allocation BEGA1 'Neasden Stations Growth Area' and covered by adopted Neasden Stations Growth Area Masterplan SPD		

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	Planning permission 08/2627 for erection of open-fronted extension to existing waste-transfer building. 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.		
Status in Adopted Local Plan	Within site allocation BEGA1 ‘Neasden Stations Growth Area’ in the Brent Local Plan 2019-2041 and covered by adopted Neasden Stations Growth Area Masterplan Supplementary Planning Document – part of wider area envisaged for comprehensive redevelopment including industrial intensification, new passenger railway line infrastructure and residential development.		
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:	Within adopted Local Plan site allocation BEGA1 ‘Neasden Stations Growth Area’ and covered by adopted Neasden Stations Growth Area Masterplan SPD		