

Planning Statement

Issue 01

Produced for **West London Composting**

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Harefield Composting Facility



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1.0 INTRODUCTION

1.1 Project Context

This document has been produced by WRM in support of a request for a temporary extension to planning application 12579/APP/2012/2366, granted on the 17/09/2015. The applicant is requesting, under Section 73 of the Town and Country Planning Act 1990, that condition 1 of the current permission be varied to allow a temporary extension to activities for a period of one year. The current permission (description of development) allows the applicant to conduct the following development:

'The continuation of existing recycling operations at land to the North and South of New Years Green Lane for an organic composting facility operation to handle a maximum throughput of up to 75,000 tonnes per annum of organic waste for a temporary period of five years.'

Condition 1 of the current permission states the following:

1. The use of the maturation site at Pylon Farm, north of Newyears Green Lane hereby permitted shall be discontinued and the land restored to its former condition on or before five years from the date of this permission, in accordance with a scheme of work submitted to and approved by the Local Planning Authority.

The applicant requests that the condition be amended to the following:

'1. The use of the maturation site at Pylon Farm, north of Newyears Green Lane hereby permitted shall be discontinued and the land restored to its former condition on or before the 17th September 2021, in accordance with a scheme of work submitted to and approved by the Local Planning Authority.'

This extension application is being made to the London Borough of Hillingdon Council because a separate full planning application is currently being produced for permanent residency of the West London Composting facility. This new application (permanent residency) will request permission for the identical treatment capacity as to what is permitted under reference 12579/APP/2012/2366. For the avoidance of doubt this is up to 75,000 tonnes per annum of organic waste through the existing recycling operations at land to the North and South of New Years Green Lane. Due to delays in the process caused by Coronavirus restrictions it is envisaged that a number of technical assessments won't be able to be completed and submitted to the council ahead of the September date, as stated within the current permission. By granting the one-year extension it will allow the applicant sufficient time for all technical assessments to be completed and a comprehensive permanent planning application be submitted to the council for review.

This temporary extension application purely involves requesting an extension of one year to the current permission. Once the year is complete, West London Composting will hopefully achieve full permanent planning permission for the site north and south of New Years Green Lane and this permission (12579/APP/2012/2366) will be superseded.

It is part of an application pack which includes:

- The planning application form;
- The planning statement;
- Site location plan;
- Site boundary plan;

- Decision Notice 190915 (reference 12579/APP/2012/2366)

This document will now provide an overview of the applicant, the current activity, surroundings, site history, policy context, significance of the development and environmental aspects.

2.0 THE SITE AND APPLICANT

West London Composting Limited (WLC) is the applicant, owner and operator of the site on which this application is focussed upon. WLC operate an In-Vessel Composting (IVC) and Open Windrow Composting (OWC) facility which was first established in 2004. The site has the capacity to process 75,000 tonnes of organic waste each year and produces a variety of high-quality PAS100 soil conditioners for agricultural and commercial use. The inputs for the composting process come from a variety of local authority contracts such as Hertfordshire Council and West London Waste Authority, as well as smaller commercial suppliers.

The full address of the existing installation is:

High View Farm,
New Years Green Lane,
Harefield,
Middlesex,
UB9 6LX.

Please see Figure 1 below for an overview of the site. Please note, the specifics of the surrounding area/features are discussed in detail in section 2.3.

The total area of the site where WLC conduct their composting operation is approximately 39,904m² (3.99 hectares). This is split as follows:

- Surface area of IVC facility (South side of New Years Green Lane) = ~23,297m²
- Surface area of OWC pad (North side of New Years Green Lane) = ~16,607m²



Figure 1 - Site Boundary taken from SLR Drawing 002 included in application reference 12579/APP/2012/2366

2.1 Current Operation

The IVC and OWC activities are carried out on two neighbouring, yet separate, sites. The IVC site and waste transfer activity are located to the south of New Years Green Lane and the OWC site is located to the north of the same road. Treatment operations therefore comprise of the following:

- the sanitisation of green and food wastes through the IVC system (<75,000 tpa),
- the stabilisation of green and food wastes through the OWC system (<75,000 tpa),

The currently permitted waste activities, including operational limits and permitted wastes by scheduled activity, are identified within the Environmental Permit (EPR/UP3893EC). Current planning permission authorises 75,000tpa to be processed through the IVC facility and then through the subsequent OWC activity. An overview of the current process is included below for reference.

For the IVC process, food, green or comingled waste material is received and stored in the reception buildings on the southern portion of the site. Following waste acceptance, a loading shovel is used to deposit the raw material into the hopper of the high-speed shredder – a dedicated loading shovel is used to deposit the raw material in the hopper of the shredder. The operator can select different loads to achieve the required mix; additionally, the moisture content of the shredded material can be increased by spraying with leachate water captured from within the treatment tunnels.

From here, material is loaded into vessels using a loading shovel. There are 32 individual vessels (IVC vessels) on site, consisting of two similar barriers of vessels with slightly differing dimensions. Barrier 1 consists of 16 vessels with dimensions of 7.5m (w) x 14m (l) x 3m (h) equalling 315m³ per vessel. Barrier 2 consists of 16 vessels with dimensions of 7.5m (w) x 15m (l) x 2m (h) equalling 225m³ per vessel. The Barrier 1 tunnels are actively aerated via pipes incorporated into the floor of the tunnels. A proportion of the air flow is recirculated through the tunnels and the temperature (in the compost) is continuously monitored to ensure compliance with the temperature and retention requirements of the Animal By-Products Regulations (ABPR). After typically 7 days in Barrier 1, the material is cooled (by introducing fresh air for at least 6-hours) prior to being transferred to Barrier 2 to complete the sanitisation process required by the ABPR. After typically 7 days in the Barrier 2 vessels the material is cooled (by introducing fresh air for at least 6-hours), unloaded and transferred to the maturation pad. Four biofilters, constructed from chipped oversize material as biofilter media are situated in Barrier 1.

Following the sanitisation phase the compost is transferred to the OWC pad (maturation site) and formed into windrows. There are 7 windrows on the maturation site, the dimensions of each windrow shall be approximately 3m (h), 6m (w) and 32.5m (l) and are approximately 600-900 tonnes each. The maximum tonnage that can be processed at any one time on the composting pad is approximately 10,000 tonnes. Gaps of suitable width to enable turning/monitoring and litter picking will be left between the windrows.

The stabilisation phase is a minimum 4-week process during which time monitoring equipment will be used for temperature monitoring and moisture levels will be assessed by grip test to ensure critical limits for composting are being met. During this period a minimum of 2 turns are made to fully incorporate the compost by loading shovel.

Screening of the compost following the active composting phase shall be carried out with a Trommel and result in a 0-10 mm soil improver and 0-25 mm soil improver, certified to PAS100 and the Compost Quality Protocol (CQP). Oversize material coming off the trommel shall only be re-composted if visual assessment confirms that physical contaminants will not adversely affect the composting process or prevent effective control of compost quality.

Products are stored on the storage pad to the south of the site following screening, ready for dispatch to the end markets. Each product batch is identifiable in its storage location by a with a unique product batch code. Each product batch contains compost from no greater than 6 batches and may be stored for a maximum of 6 months before dispatch to the customer.

3.0 SPECIFICS OF SITE

3.1 Location

The site is located west of Ruislip, approximately 5km from the M25 which connects to the M40. Uxbridge is situated approximately 4km to the south west of the site and Wembley is 7km to the south east. The Birmingham to London 'Chiltern Line' railway is situated approximately 1km south of the site and follows an east to west route. Access to the site is via New Years Green Lane. The site currently comprises of two separate areas; an area to the south consisting of waste reception, in-vessel composting of food, green and comingled wastes, and a large concrete pad to the north for stabilisation, maturation and storage of compost through an open-windrow composting process.

The surrounding area is predominantly agricultural land with Ruislip Woods Site of Special Scientific Interest (SSSI) located approximately 120m to the north of the OWC pad.

3.2 Environmental Features/Designations

An updated search of the surrounding area for key environmental features is displayed below in Table 1.

Table 1- Planning Constraint Review for West London Composting, Newyears Green Lane

Planning / Material Consideration	Location of West London Composting Site
Is the site within a SSSI?	The site is not in a SSSI. The nearest SSSI is Ruislip Woods, approximately 120m northwest of the site.
Is the site in a site of Special Area of Conservation (SAC)?	The site is not in a SAC. The nearest SAC is Burnham Beeches which is approximately 10km west of the site.
Is the site within a Special Protection Area (SPA)?	The site is not within a SPA. The nearest SPA to site is the South West London Waterbodies SPA which is approximately 13km south of the site.
Is the site within a RAMSAR location?	The site is not within a RAMSAR site. The nearest RAMSAR to site is the South West London Waterbodies SPA which is approximately 13km south of the site.
Is the site located within a National Nature Reserve (NNR) and/or Local Nature Reserve (LNR)?	The site is not within a NNR or an LNR. The nearest NNR is Ruislip Woods, approximately 120m northwest of the site.
Is the site within an Area of Outstanding Natural Beauty (AONB)?	The site is not within an AONB. The closest AONB is the Chilterns AONB which is approximately 7km northwest of the site.
Is the site located in a Green Belt?	The site is located within the London Area Green Belt.
Is the site in a National Park?	The site is not in a National Park. The closest National Park is the South Downs which is approximately 51km southwest of the site.
Is there a listed building in close proximity to the site?	There is a Grade-II listed building (St Leonard's Farmhouse) approximately 27m east of the site.
Is there a Scheduled Ancient Monument (SAM) in close proximity to the site?	The nearest SAM is approximately 745m south of the site.
Is there a world heritage site in close proximity to the site?	The site is not in close proximity to a world heritage site. The nearest world heritage site (Kew Royal Botanical Gardens) is approximately 16km southeast of the site.

Planning / Material Consideration	Location of West London Composting Site
Is the site within close proximity of a Registered Park and Garden?	The site is not within close proximity of a Registered Park or Garden. The nearest one is Harefield Place and is approximately 1.8km to the northwest of site
Is the site in Flood Zones 2 or 3?	The site is not situated in Flood Zones 2 or 3.
Is the site within a source protection zone?	The site is situated in a source protection zone 1 & 2.
Is the proposed site within an Air Quality Management Areas (AQMAs)?	The site is not located within an AQMA. The closest AQMA is Hillingdon AQMA for Nitrogen Dioxide, approximately 1.1km south of the site.

3.3 Sensitive Receptors

The site is situated at the following distances from human receptors.

Table 2 – Nearest Human Receptors to West London Composting, Newyears Green Lane

Receptor	Distance (m)	Directions from Site
Four residential houses (North of New Years Green Lane)	20	West of OWC pad.
St Leonards Farm (Ace Grab Hire and Haulage)	34	East of OWC pad.
Elm Tree Farm	50	East of IVC facility.
Pylon Farm Residential Property	30	West of IVC facility.
Pond Farm Industrial Units	25	West of IVC facility.
Crows Nest Farm (Country Compost Ltd Open Windrow Composting Site)	225	East of IVC facility.
Braemar Farm	180	Southwest of IVC facility.

4.0 HISTORIC PLANNING CONSENTS

The following section provides a summary of the historic planning consents issued for the site. For ease of reference, the planning history at the North side of the site (Pylon Farm) is given first, followed by the South side of the site (Highview Farm). The commentary is structured from the earliest to latest planning approval. This was already covered in the previous application (reference 12579/APP/2012/2366).

Pylon Farm (North side)

- Planning permission was granted on 13 September 2002 for change of use from agriculture to organic composting site for open windrows (Ref:12579/M/99/2048). Since Council policy aims to increase green waste recycling, this was considered sufficient special circumstances to justify the use in this location, to the extent that the harm on the openness of the Green Belt had been outweighed. Therefore, even though the application was contrary to Green Belt policy, approval was recommended subject to a S106 Agreement to divert public footpath U36. Engineering and development of the compost maturation area (application site) commenced in May 2004 and the facility was opened to accept waste on 16th July 2004.
- There are no restrictions governing the level of use on this site other than that the windrows shall not exceed 1.5 metres in height (condition 9). However, this permission was temporary until 6 May 2006.
- On March 6th, 2006 an application (Ref 12579/APP/2006/673) was submitted to allow the continued use of the original maturation area for a further five years and was granted. The permission expired on 17th August 2011.
- On May 18th, 2006 another application (ref:12579/APP/2006/1524) was granted on 18/8/2006 for increasing the size of the maturation area (to allow operations to become more efficient). The permission expired on 17 August 2011.
- On 19th February 2007 an application Ref: 12579/APP/2007/534 submitted to relocate the drainage lagoon to the northern end of the site. The application was approved on 24/5/2007. The permission expired on 16th August 2011.
- Further planning permissions were granted in October 2011, for the above-mentioned temporary approvals for a period of one year, to allow maturation operations to continue whilst the planning application and associated Environmental Statement of reference 12579/APP/2012/2366 were being prepared.
- In conjunction with Highview Farm, WLC have historic planning approval (reference – 12579/APP/2012/2366) granted on the 17th September 2015 for the continuation of existing recycling operations for a temporary period of five years. This permission allows WLC to process a maximum throughput of up to 75,000 tonnes per annum. As this is the case, this approval runs out in September 2020.
- A separate planning application was provided (reference 12579/APP/2016/4099) to discharge condition 3, 8, 9, 13, 15 and 16 of application reference – 12579/APP/2012/2366. The only condition still outstanding is condition 15.
- As well as the planning application for discharging historic planning conditions 15 and 16 under application 12579/APP/2016/4099, WLC also installed two new leachate tanks and

a freshwater tank on the maturation site which required retrospective planning. This application is currently with Hillingdon Council for determination, but it is the operator's intention is to withdraw this application when this current application for permanent planning is submitted and include the tanks in the requested permission.

Highview Farm (South side)

- A permanent planning permission ref: 39755/APP/2002/3026 dated 5th June 2003 was granted for the reception building and associated infrastructure. A further permanent planning permission ref: 39755/APP/2006/1446 was granted in June 2006 for the erection of 16 further vessels (June 2006).
- There were restrictions governing the level of use on this site to a maximum of 50,000 tonnes of waste per annum.
- In conjunction with Pylon Farm, WLC have historic planning approval (reference – 12579/APP/2012/2366) granted on the 17th September 2015 for the continuation of existing recycling operations for a temporary period of five years. This permission allows WLC to process a maximum throughput of up to 75,000 tonnes per annum. As this is the case, this approval runs out in September 2020.
- A separate planning application was provided (reference 12579/APP/2016/4099) to discharge condition 3, 8, 9, 13, 15 and 16 of application reference – 12579/APP/2012/2366. The only condition still outstanding is condition 15.

5.0 POLICY CONTEXT

The previous application (reference 12579/APP/2012/2366) contained a comprehensive review of applicable planning policy against the proposed activity. The planning application was granted which suggests that the application is in line with general planning policy and provides a benefit to the local area. As this is the case, this application will not contain a full policy review as it is seen by the applicant that the development is already acceptable when assessed for a set of time of five years period. As the applicant is requesting permission for a one year extension to aid in the production of the comprehensive planning application for permanent residency of the site North and South of New Years Green Lane, the granting of a one year extension is not seen to deviate from planning policy already reviewed.

The comprehensive planning application for permanent residency will also include a full policy review against National, Regional and Local Level Policies so any policies which have been updated will be captured in this review.

6.0 OTHER CONSIDERATIONS

6.1 Significance of the Development

The West London Composting site has already been operating as a composting facility in the local vicinity for a number of years. The site is the primary facility for managing organic waste across West London and it is deemed an 'allocated site' within the West London Waste Plan. This demonstrates the wider need for the site. The site also plays a crucial role in elevating this waste up the Waste Hierarchy.

In the event West London Composting stopped processing the organic waste contracted by Local Councils, the Local Councils would have to find another sizeable outlet, adding additional burden to public services in this area.

6.2 Environmental Aspects

It is not anticipated that there will be any increased risk on environmental issues attributed to the granting of a temporary one-year extension. It is the view of the applicant that environmental risk was a key area of the previous planning application (reference 12579/APP/2012/2366) so was given due consideration and the permission was ultimately granted by the Council.

In addition, a range of environmental risks, such as odour, bioaerosols and groundwater contamination (non-exhaustive) will be assessed within the new comprehensive planning application for permanent residency of the site. Environmental protection will therefore continue to be a key priority at West London Composting through the planning process.

7.0 CONCLUSION

In conclusion, it is clear that granting of the one-year temporary extension will allow West London Composting to complete and submit a comprehensive planning application for permanent residency of the site whilst operating in the same manner they have for a number of years.

In addition, the extension will allow West London Composting to continue to act as an 'Allocated Site' under the West London Waste Plan and provide a valuable outlet for Local Council generated waste, to elevate organic waste up the Waste Hierarchy.

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