



GP PLANNING LTD



CIRCULAR ECONOMY STATEMENT

PROPOSED REGULARISATION AND EXTENSION TO THE
EXISTING GREEN WASTE OPEN WINDROW COMPOSTING
OPERATIONS

LAND OFF NEW YEAR'S GREEN LANE, HAREFIELD, UXBRIDGE,
HILLINGDON, UB9 6LX

WEST LONDON COMPOSTING LTD

FEBURARY 2023

Circular Economy Statement		
Highview Farm – Compost Pad Extension Area	Envar Composting Ltd	E001-19

Revision	Comments	Author	Date
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1 INTRODUCTION

1.1 Context

- 1.1.1 This Circular Economy accompanies a Planning Application submitted to Hillingdon Borough Council (as Waste Planning Authority) on behalf of Envar Composting Ltd seeking planning permission to regularise the existing green waste composting operations and to extend the green waste compost maturation area at the Applicant's existing green/food waste recycling and open windrow composting facility. The Application Site address is Highview Farm, Newyears Green Lane, Harefield, UB9 6LX in the London Borough of Hillingdon. The proposal also includes an Ecological Enhancement area designed to achieve Biodiversity Net Gain.
- 1.1.2 A referable application is defined as "an application for planning permission of potential strategic importance (PSI)" by the Mayor of London Order 2008. Part 2 (Major Infrastructure) states that "Waste development where the development occupies more than one hectare" is categorised as PSI development.
- 1.1.3 Policy SI7 of the London Plan requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, whilst London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. This Circular Economy Statement is therefore made on behalf of Envar Composting Limited as the Applicant.

1.2 The Existing Permitted Development

- 1.2.1 The Applicant's existing facility receives and treats green and food waste collected mainly from the Local Waste Authority Contractors within West London and recycles the material into a compost product for re-use thereby complying with the principle of a Circular Economy.
- 1.2.2 Current composting activities have been undertaken at the proposed site on a daily basis since the 16th July 2004 when the site first opened for the acceptance of waste materials. The existing composting operation is split into two distinct areas of operation. These areas are separated by New Year's Green Lane.
- 1.2.3 The operational area to the south of New Year's Green Lane (High View Farm) houses the In-Vessel Composting activity. During this part of the operation, the waste materials undergo the first phase of composting before being transferred to the area north of New Year's Green Lane (Pylon Farm) where the

partly treated waste material completes its transformation into compost by being formed into windrows. Both phases and therefore both operational areas are essential to the process of composting waste.

1.2.4 Envar was recently successful in gaining full Planning Permission (a consolidating permission) for the entire site from Hillingdon Borough Council for the continued use of a composting facility operation up to 75,000 tonnes per annum of organic waste, including retrospective retention of two above ground leachate storage tanks and the installation of three freshwater storage tanks (planning permission no.12579/APP/2021/2010).

2 PLANNING POLICY CONTEXT

2.1.1 Paragraph 9.7.1 of the London Plan 2021 states that:

Waste is defined as anything that is discarded. A circular economy is one where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste. London should move to a more circular economy as this will save resources, increase the resource efficiency of London's businesses, and help to reduce carbon emissions. The successful implementation of circular economy principles will help to reduce the volume of waste that London produces and has to manage. A key way of achieving this will be through incorporating circular economy principles into the design of developments (see also Policy D3 Optimising site capacity through the design-led approach) as well as through Circular Economy Statements for referable applications.

2.1.2 Policy SI 7 (Reducing waste and supporting the circular economy) of the London Plan 2021. Part B of Policy SI 7 requires that referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:

- 1) how all materials arising from demolition and remediation works will be re-used and/or recycled
- 2) how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life
- 3) opportunities for managing as much waste as possible on site
- 4) adequate and easily accessible storage space and collection systems to support recycling and re-use
- 5) how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy
- 6) how performance will be monitored and reported.

2.1.3 Policy D3 of the London Plan 2021 deals 'Optimising site capacity through the design-led approach'.

2.1.4 The GLA has produced guidance (adopted March 2022) for Applicant's who are required to submit Circular Economy (CE) statements. The document notes that the six circular economy (CE) principles, which should be a fundamental part of the building design process, are:

- 1. building in layers – ensuring that different parts of the building are accessible and can be maintained and replaced where necessary*

2. *designing out waste – ensuring that waste reduction is planned in from project inception to completion, including consideration of standardised components, modular build, and reuse of secondary products and materials*
3. *designing for longevity*
4. *designing for adaptability or flexibility*
5. *designing for disassembly*
6. *using systems, elements or materials that can be reused and recycled.*

2.1.5 The principles support the application of the waste hierarchy in that avoiding or reducing waste is prioritised.

3 CIRCULAR ECONOMY STATEMENT

3.1.1 At paragraph 9.7.2 of the London Plan, it states:

The adoption of circular economy principles for referable applications means creating a built environment where buildings are designed for adaptation, reconstruction and deconstruction. This is to extend the useful life of buildings and allow for the salvage of components and materials for reuse or recycling. Un-used or discarded materials should be brought back to an equal or comparable level of quality and value and reprocessed for their original purpose (e.g. recycling glass back into glass, instead of into aggregate).

3.1.2 It is clear that the aspirations of Policy SI 7 (Reducing waste and supporting the circular economy) of the London Plan 2021 primarily relates to new development where there is demolition and new building works taking place. In the case of the Applicant's proposal, there are no buildings proposed to be constructed or any existing development being demolished. The Applicant therefore does not have the opportunity to consider designing buildings for adaptation, reconstruction and deconstruction because they are already built.

3.1.3 A proportionate response to the need for Circular Economy Statement is therefore required in this case. The following section therefore sets out a response to the matters 1 - 6 in Part of Policy SI 7 of the London Plan 2021.

1) How all materials arising from demolition and remediation works will be re-used and/or recycled

3.1.4 There is no demolition or remediation taking place as part of the proposed development, therefore part 1 is not particularly relevant in this case. The construction of the proposed maturation yard will involve the stripping of existing soils which will be retained on site for use in landscaping works and construction of screening mounds.

2) How the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life

3.1.5 The Applicant's proposal does not involve any construction works or material design issues that are relevant to the part 2 of Policy SI 7.

3) Opportunities for managing as much waste as possible on site

- 3.1.6 The construction of the maturation yard will involve a cut and fill exercise. All material in the construction of the compost maturation pad will be retained on site for use in landscaping and perimeter screening mounds.
- 3.1.7 The Environment Agency published on 21st September 2021 guidance on the 'Biological waste treatment: appropriate measures for permitted facilities'. The guidance applies to aerobic and anaerobic processes including composting in open-air and closed (in vessel) systems. The Applicant seeks to extend the current compost maturation pad to demonstrate compliance with Environment Agency's 'Appropriate Measures Guidance' requiring a reduction in Fire Risk and minimise Odour generation
- 3.1.8 Strategic Objective 2 of the Waste Local Plan (WLP) seeks to encourage development which supports sustainable waste management at least in line with national targets for recycling, recovery and composting. At paragraph 3.2.1.1, the WLP confirms that:

National policy states that in preparing local plans, WPAs should drive waste management up the waste hierarchy. This means encouraging prevention of waste, and preparing for the re-use, recycling and recovery of waste (including recovery of inert waste to land).

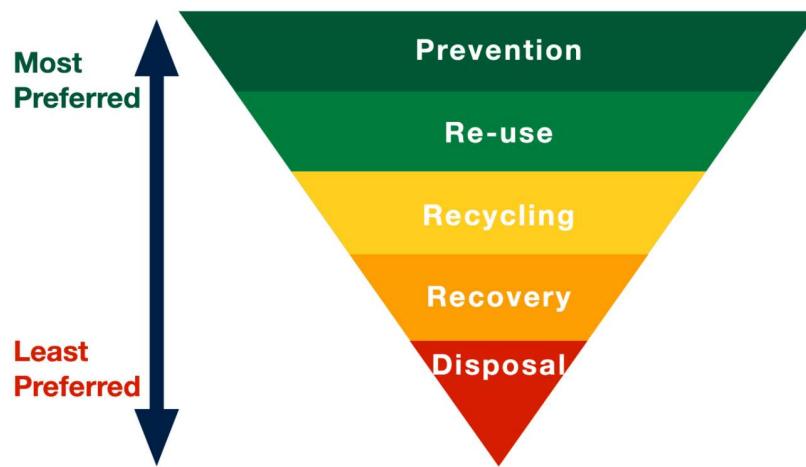
- 3.1.9 The Applicant's proposal will enable green waste recycling to be maximised and ensure compliance with the Environment Agency's 'Appropriate Measures Guidance'. The proposal will make an important contribution to green waste recycling, reducing emissions and helping to meet the Government's climate change. The proposal therefore complies with the London Plan's aspiration of moving towards a circular economy, increasing the resource efficiency of London's businesses, and helping to reduce carbon emissions.

4) Adequate and easily accessible storage space and collection systems to support recycling and re-use

- 3.1.10 One of the fundamental objectives of the Applicant's proposal is to provide accessible storage and collection of the green waste recycling operations complying with the aspirations of part 4) of Policy SI 7. The proposal will provide an increase in maturation space complying with the Environment's Agency's permitting requirements thereby supporting the recycling process of the sustainable green waste management facility. The proposal therefore complies with part 4) of Policy SI 7.

5) How much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy

3.1.11 The Applicant's proposal will not generate waste on-site and is dedicated to recycling green waste collected in the west of London, mainly by local authorities. The Applicant's proposal is fully compliant with the Government's Waste Hierarchy (see below) by recovery, recycling and re-using the material in the form of compost, which is used as a fertiliser by farmers.



3.1.12 The Applicant's proposal shows full compliance with the Mayor of London's aspirations of moving towards a circular economy. The proposed development will make a significant and important contribution in providing organic waste management capacity for the West of London area and will divert waste from landfill moving waste up the waste hierarchy.

6) How performance will be monitored and reported.

3.1.13 The Applicant's sustainable waste management activities are monitored and controlled under the existing Environmental Permit by the Environment Agency who make regular monitoring and audited site visits. The Applicant is required to provide annual reports to the Environment Agency demonstrating compliance with the conditions of the Permit.

3.1.14 On the basis that the Planning Application is successful, the Applicant will be required to vary the existing permit to cover the proposed extension to the maturation and green waste recycling operations. The monitoring and reporting requirements of the Environmental Permitting Regulations 2016, together with the planning conditions imposed on any grant of planning permission will ensure that the proposal complies with Policy SI 7 of the London Plan in terms of monitoring the site's performance.



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